

17 May 2022



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Dear Mr Briginshaw,

Unit 3, Prologis Distribution Park, Stockley Road, West Drayton, Hillingdon, UB7 9FN
Submission of Full Planning Application under the Town and Country Planning Act 1990 (as amended)

We write on behalf of our client, Virtus London 7 Limited, we submit this full planning application in relation to the proposed data centre at the above site comprising the installation of plant and equipment at the existing unit. The proposed description of development comprises the following:

"Full planning application for Installation of a plant gantry adjacent to the southern elevation"

Further information to support this Full Application request is set out below. The following plans and reports accompany this submission for consideration:

Plans

- A100-SITE PLAN
- A100-B-EXTERNAL WORKS – FENCING
- A110.00-FLOOR PLAN GROUND LEVEL
- A110.02-FLOOR PLAN FIRST FLOOR LEVEL
- A115-FLOOR PLAN ROOF
- A116-FLOOR PLAN GANTRY LEVELS 0-2
- A210-FULL BUILDING EXTERNAL ELEVATIONS
- A211-EXTERNAL FENCING ELEVATIONS
- A212-GANTRY ELEVATIONS
- A310-FIRST FLOOR DH SECTIONS SECTIONS
- A311-GANTRY SECTIONS

Supporting documents

- Acoustic Consultancy Report prepared by LCP;
- Energy Strategy prepared by Norman, Disney and Young;
- Air Quality Assessment prepared by Aecom
- CIL Form.

Our client has engaged the London Borough of Hillingdon (LBH) in Planning Performance Agreement (PPA) amounting to a fee of £17,500 (+VAT).

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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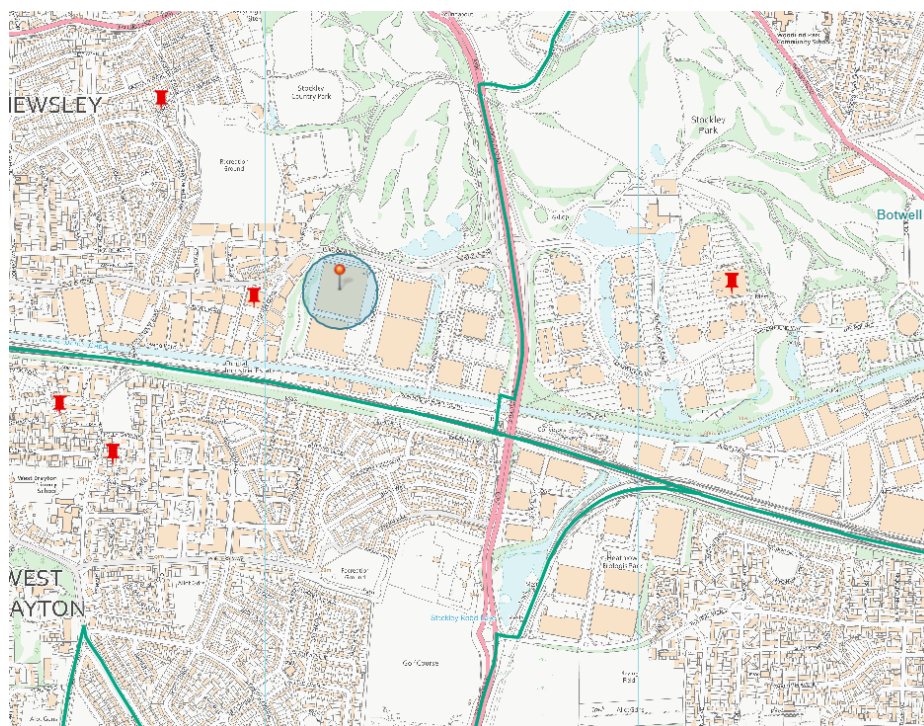


The Applicant

Virtus London 7 Limited is London's leading data centre company and part of ST Telemedia Global Data Centres. Virtus build and operate the UK's most efficient facilities which underpin the UK's digital economy. With over a decade of experience in designing and operating cutting-edge data centres in London, Virtus has built a strong reputation for providing Operational Excellence and delivering robust, complex solutions for the most demanding Global customers.

The Site

The site is located in the north eastern corner of Prologis Stockley Park Industrial Estate, which is approximately 2km south east of Yiewsley. Prologis Stockley Park Industrial Estate is an established logistics and industrial park strategically positioned to access the major consumer markets of West and Central London, Heathrow Airport, and Thames Valley. The industrial park comprises 6 large industrial units, each with associated parking and servicing yards. The surrounding industrial units have been designed and constructed in exactly the same manner with the same appearance with each site of similar size. The land outside the industrial park comprises of residential estates and recreational ground. The location of the site is seen in the image below:



The Park benefits from excellent communication links. The M4(J4) is within 0.5 miles and the M25/ M4 intersection is 2.5 miles as well as London Heathrow Airport being only 1.6 miles from the park.

The application is located to the north of the industrial park. The full logistics and industrial park measures approximately 12 ha in size. The site is currently allocated for employment use with a single industrial logistics building (B8 storage and distribution buildings) with ancillary B2 Offices.

Planning History

Planning Reference	Description	Decision
37977/APP/2015/1004	Hybrid Application for the phased comprehensive redevelopment of the site to provide an overall maximum	Approved

	gross floorspace of 45,000sqm of light industrial uses (Use Class B1c and/or Use Class B2) and/or storage and distribution uses (Use Class B8) and ancillary offices, together with servicing, parking, access roads and open space. Full planning permission is sought for Phase 1 containing 18,900sqm of floorspace in two buildings up to 16.2 metres in height (to ridge), together with associated highways works, open space, hard and soft landscaping, car parking and associated infrastructure. Outline planning permission is sought for Phase 2 for up to 26,100sqm of floorspace with all matters, except for access, reserved for later determination	
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Planning policy context

The relevant parts of the Development Plan for the London Borough of Hillingdon (LBH) consists of:

- Local Plan Part 1 (adopted November 2012)
- Local Plan Part 2 (adopted January 2020);
- The London Plan (adopted March 2021).

The Proposal

Virtus London 7 Limited seeks full planning permission for the installation of a data centre comprising plant and equipment to the existing unit. The applicant seeks to provide these facilities within the existing servicing area on site. The proposed development will include:

*Installation of a plant gantry adjacent to the southern elevation - (85.92m (L) x 14.1m (W) x 15.72m (H)).
Volume : 19,044 cubic meters. Flues are 18m high)*

Principle of Development

The site is located within an allocated Strategic Industrial Location (SIL) under the adopted Local Plan. Policy DME1 of Local Plan Part 2 sets out that SILs are protected for employment proposals and therefore only uses falling under Use Class B1(c), B2, B8 and Sui Generis use will be permitted. Development proposals must not compromise the integrity of the employment areas.

The existing warehouse use on site falls under B8 use (storage and distribution), in accordance with the SIL designation. The applicant seeks to provide plant and equipment adjacent to the existing unit, which falls under Use Class B2 (General Industrial). On this basis, the proposed development will not adversely impact the integrity of the existing operations and is consistent with policy given the proposed industrial use.

Design

The external appearance of the new planting will be a simplistic design using grey cladding. The new structure will be subservient (both in height and width) to the existing building and blend with the existing materials and be fitting to the layout. The location of the planting means it not visible from wider views. The gantry will be the same colour as the existing building and gantry, as seen in the images below:



Noise

Policy EM8 of Local Plan Part 1 sets out that the Council will seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.

An acoustic survey has been carried out by LCP to establish the representative background sound levels local to the site generally in accordance with the method contained within BS4142:2014. Calculations have been carried out to determine the noise levels at the nearest receiver premises. The calculations show that the design criteria will be met and that noise caused throughout construction and the functioning of the plant will not be significant.

Air Quality

Policy EM8 of Local Plan Part 1 sets out that all development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Furthermore, Policy DMEI 14 of Local Plan Part 2 sets out that all development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Furthermore, the policy requires that development proposals should be least “air quality neutral” and should ensure that there is no unacceptable risk from air pollution to sensitive receptors.

The London Borough of Hillingdon declared an Air Quality Management Area (AQMA) encompassing the southernmost two thirds of the Borough in 2003 on the basis that exceedances of the national annual mean AQS objective for NO₂. The proposed development is situated within the AQMA.

An air quality assessment has been undertaken by Aecom in order to assess the potential local air quality impacts of the proposed development.

In accordance with guidance published by the Mayor of London and the IAQM, the following measures are proposed to mitigate adverse impact on air quality during the construction phase:

- Record all dust and air quality complaints, identify causes, and take appropriate measures to reduce emissions in a timely manner;
- Ensure all on-road vehicles comply with the requirements of the London Low Emission Zone;
- Ensure that non-road plant and vehicles are well maintained and comply with the prevailing London Non-Road Mobile Machinery standards;
- Ensure all vehicles switch off engines when stationary;
- Ensure vehicles entering and leaving the Site are covered to prevent escape of materials during transport;
- Avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable and safe to do so;

- Production of a Construction Logistics Plan to manage the sustainable delivery of goods and materials;
- Only use cutting, grinding or sawing equipment fitted or in conjunction with suitable dust suppression techniques;
- Ensure an adequate water supply on the site for effective dust/ particulate matter suppression/ mitigation, using non-potable water where possible and appropriate;
- Ensure bulk cement and other fine powder materials are delivered in enclosed tankers and stored in silos with suitable emission control systems to prevent escape of material and overfilling during delivery;
- For smaller supplies of fine powder materials ensure bags are sealed after use and stored to prevent dust;
- Avoid bonfires and burning of waste materials.

In terms of mitigation measures during the operation phase of the development, the applicant will need to consider investment/ expenditure on measures to mitigate the likely impacts on local air quality from the standby generator sets, as far as reasonably practicable. The value of such investment is expected to be guided by the outputs of the damage cost assessment, though it is highlighted that the selection of measures to be adopted will need to be discussed and agreed between the Applicant and LBH.

Energy

Policy DMEI 2 of Local Plan Part 2 requires all development to contribute towards the minimisation of carbon dioxide emissions, as set out in the London Plan. Where contribution towards target carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution.

By nature, data centres require large amounts of electrical energy to meet the process load, used to run the facility. The scale of the energy consumed by the process load means that building services system selection and efficiencies are key to reducing carbon dioxide emission rates, whilst renewable technologies offer limited scope for savings.

An Energy Report has been prepared by Norman, Disney and Young to present the energy strategy that Virtus shall adopt to demonstrate an efficient use of energy used within the Data Centre, and provide proposals for the required contribution of renewable energy for the commercial office areas of the development.

The report sets out that the process load within the data halls will be optimised using a combination of energy saving engineering technology to reduce the electrical power consumption by approximately 24.2% against a typical current data centre. The evaluation demonstrates that pursuing traditional LZC technologies such as wind, biomass, solar hot water and ground source heating/ cooling would not make a practical contribution to meeting the targeted energy reduction limits. CHP was not deemed viable and the scheme has therefore

concentrated on reducing energy at the outset, and low carbon technologies that are practical to implement and specific to data centre applications.

The proposed energy strategy follows the energy hierarchy set in the London Plan and will adopt a number of low carbon and new energy saving technologies to minimise the calculated energy demand and overall annual CO2 emissions. These measures include:

- Free cooling chillers;
- Variable speed fan CRAC;
- Variable speed pumps;
- Hot aisle containment;
- Energy efficient lighting;
- Low loss transformers;
- IT UPS;
- Mech UPS;
- VRF Heat Pumps.

It is considered that the proposed energy strategy has taken into account the guidance set out at regional and local level to devise an approach which is bespoke and appropriate to the site and the nature of the development.

We trust that this letter clearly outlines Virtus London 7 Limited's intentions and provides a sufficient overview of the proposals at this stage. We look forward to hearing back from you at your earliest convenience.

Yours sincerely

A handwritten signature in black ink, appearing to read "Savills" or a similar stylized name.

Kathryn Humber
Planner