4 Consultation, Alternatives and Design Evolution

4.1 Consultation

Consultation with the LPA

4.1.1 The various pre-application discussions with statutory and non-statutory consultees and the local community all have an influence over the evolution of the design of the EIA proposals and the scope of the EIA. This section summarises the consultation process undertaken with key stakeholders and includes the key issues raised during these discussions.

4.1.2 A summary of key consultation events is set out in Table 4.1.

Table 4.1 Summary of consultation events

Consultation Event	Date
LBH Pre-App No.1	13 November 2023
LBH Pre-App No.2	01 March 2024
LBH Pre-App No.3	20 June 2024
Design Review Panel 1	05 August 2024
GLA Pre-App	09 August 2024
LBH Design Workshop 1	19 August 2024
LBH Design Workshop 2	05 December 2024
Design Review Panel 2	07 January 2025

4.1.3 Full details of this are provided within the Design and Access Statement (DAS) and Statement of Community Involvement (SCI) submitted as part of the suite of documents accompanying the hybrid planning application.

4.1.4 The Proposed Development has evolved since conception and work has been undertaken by the design team to address the comments made by officers, where possible. A detailed explanation of how the scheme has evolved to take account of the consultation process is provided in the DAS. Details of how this evolution has been informed by environmental considerations is set out below.

Public Consultation

4.1.5 The Applicant has sought to involve the local community and stakeholders extensively to help shape the proposals.

4.1.6 An in-person public exhibition was held on Wednesday 23 October, 2024 from 4:00 pm until 8:00 pm to present the proposals to residents and neighbouring businesses. The public consultation event took place at Hayes & Yeading United Football Club, The SkyEx Community Stadium, Beaconsfield Road, Hayes, UB4 0SL.

4.1.7 This venue was chosen for its proximity to the Site, and the ease of access it therefore offered local residents and neighbours. Additionally, this allowed attendees to more easily visualise for themselves how the Proposed Development would be situated in the surrounding landscape. Nine public exhibition boards were situated around the room as well as key members of the project team who were available to answer any questions.

4.1.8 23 members of the public attended the exhibition. These included site neighbours, representatives of local community groups, and nearby residents. Attendees reviewed the public exhibition boards, spoke with members of the project team, and shared their feedback. Individuals were encouraged to sign in upon arrival at the exhibition event. They were furthermore provided the opportunity to complete one of the available Feedback Forms before leaving the consultation event.

4.1.9 Full details of the public consultation and responses are provided within the SCI.

EIA Consultation

4.1.10 Consultation specifically relating to the EIA has been undertaken throughout the development process to date.

4.1.11 In August 2024, a request for the formal EIA screening opinion of LBH was submitted on behalf of the Applicants. Following this request, further meetings were held with LBH and the project team to discuss the likely effects of the Proposed Development. In particular discussion were focused around the potential impacts on air quality and climate change. Following these discussions, the Council adopted an EIA screening opinion in October 2024 (Appendix 1.3) confirming that the project was EIA development given that significant effects in relation to the aforementioned environmental topics could not be ruled out and would warrant more detailed assessment under an EIA.

4.1.12 In addition to this, further technical consultation has also been undertaken as part of the ongoing EIA process with regard to the assessment scope and methodology for each of the scoped in topics. Further details of this is provided within Chapter 6 and Chapter 7.

Alternatives and design iteration

4.1.13 Schedule 18, Paragraph 3(d) of the 2017 Regulations requires an ES to include “a description of the reasonable alternatives studied by the developer, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment”.

4.1.14 The 2017 Regulations do not require the full assessment of all potential alternatives, only a reasonable account of those actually considered by a developer prior to the submission of the planning application.

4.1.15 On the basis that there are no suitable alternative sites within the Applicants’ control within the area which aren’t already being developed, alternative sites have not been considered by the Applicant or assessed in the EIA as these would not be deliverable.

4.1.16 As such, for this Site there are two realistic types of alternative, the ‘do nothing’, where the existing site remains in its current state (as set out in Chapter 2), or alternative layouts to the Proposed Development submitted for planning approval. Therefore assessment of alternatives has considered options within the following two categories:

- **‘Do Nothing’**: Under this scenario no development is implemented at the Site and baseline conditions continue in their current trends.
- **A different design**: Under this scenario the Proposed Development is realised with alternative scales and layouts in the context of developmental constraints present at the Site.

The ‘Do Nothing’ scenario

4.1.17 Under the ‘do nothing’ scenario, the Site would remain in its current condition. Data centre are becoming key infrastructure required to enable the functioning of a modern economy and there is strong demand for services generated by data centres. Under a ‘do nothing’ scenario the economic benefits of the Proposed Development, through the construction and operational phases, would not be realised. Furthermore, it is considered that the existing uses on the Site would continue to be underutilised.

A Different Design

4.1.18 Through an iterative design process evolution of the illustrative masterplan and the parameters of the Proposed Development, including building layout, height and land use were informed through consultation with the key stakeholders. Design comments were taken on board at each stage in the consultation with these bodies.

Alternative designs

4.1.19 Schedule 4, paragraph 2 of the EIA Regulations requires Environmental Statements to include:

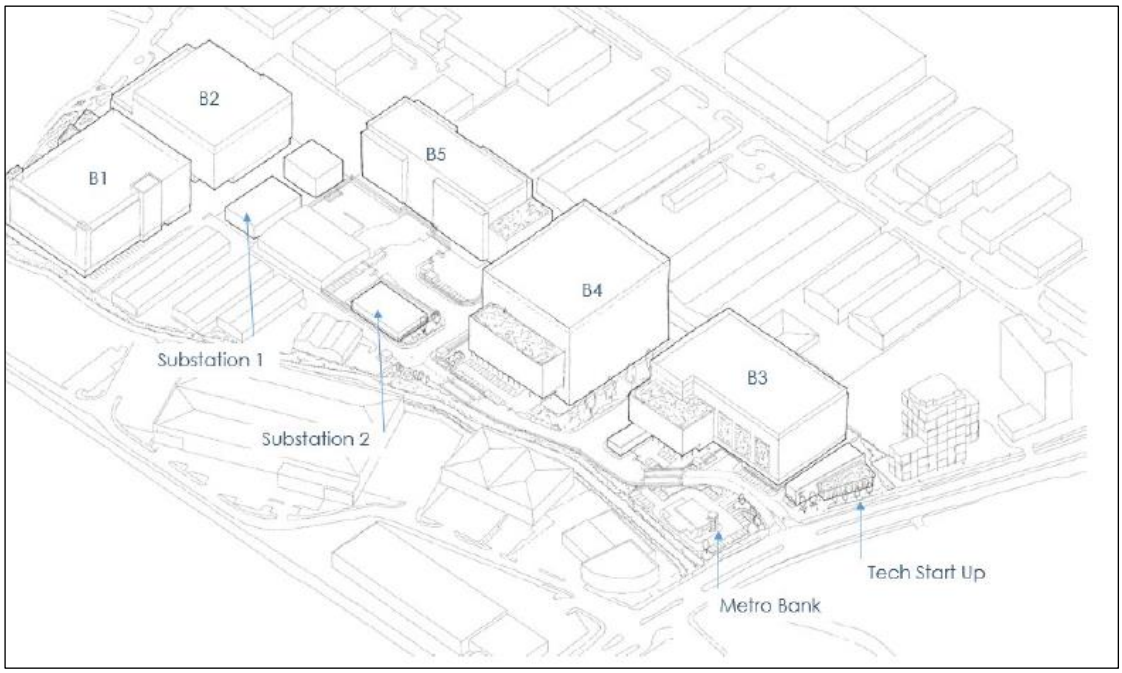
‘A description of the reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects.’

4.1.20 The design of the Proposed Development has been developed to minimise the environmental impact and, where possible, deliver environmental enhancements.

4.1.21 The design team has engaged with local authorities in a series of consultation events that played a critical role in the evolution of the proposed design. A series of regular design workshops were held to review and progress the design objectives, key principles and layout. This included inputs from the technical project team to ensure, where possible, embedded environmental mitigation was factored into the designs.

4.1.22 Following an analysis of site opportunities and constraints initial concepts design were produced. Figure 4.1 show the initial massing sketches.

Figure 4.1 - Massing sketches as presented at pre app 1

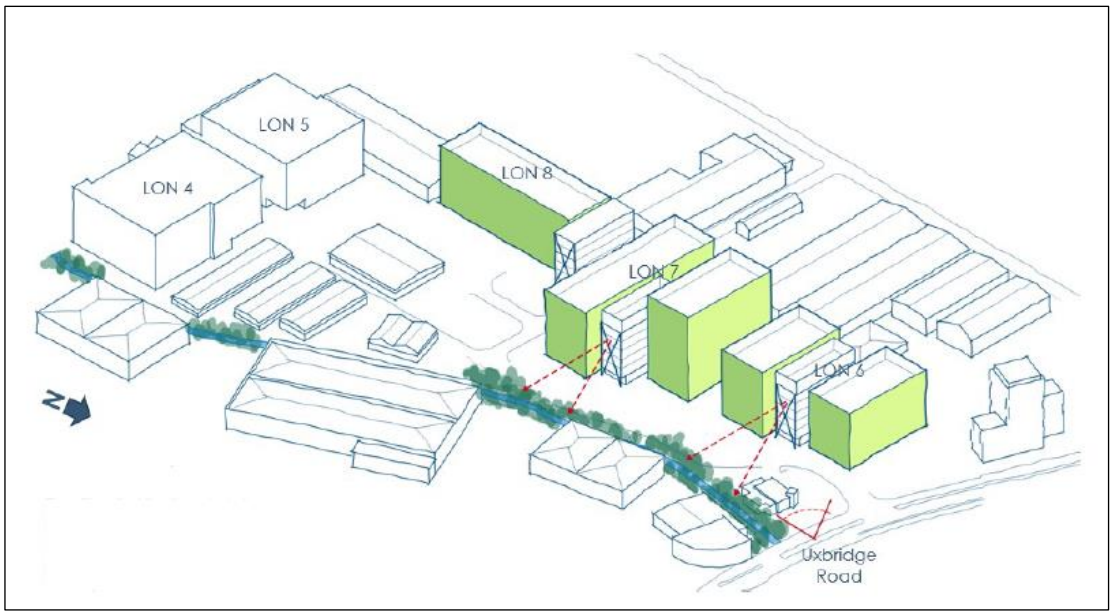


4.1.23 Concerns were raised around the massing of the proposals. The extensive footprints and building heights up to 50m with no variation were anticipated to not assimilate with the surrounding townscape and appear as a continuous unbroken mass. As such proposal were revised to add more variety to the data centre buildings. The result of this was an improved skyline and a reinforced 'cluster' effect with the tallest point located in the centre of the development. This reduced adverse visual impacts of the scheme.

4.1.24 Further analysis was done, informed by initial townscape and visual work undertaken by Iceni Projects, to understand the baseline position and how a well-designed building could be integrated into the prevailing townscape.

4.1.25 The "butterfly" proposal was developed to increase articulation of the masses and to mitigate against the perceived bulkiness of the development by separating each building into three interlinked, smaller blocks to host data storage and office functions. Figure 4.2 shows the butterfly option massing developed to further mitigate any adverse townscape impacts.

Figure 4.2 - Butterfly option massing development



4.1.26 This concept was transposed into design parameters for the elements of the scheme presented in outline form.

4.1.27 Further design reviews were undertaken focussed around building heights, materiality, landscape proposal and perimeter security fencing.

Summary

4.1.28 A summary of the design changes and influences following technical environmental review are presented below:

Table 4.2 Design changes and influences

Environmental Topic	Change	Influence on Environmental Impact and Effect
Environmental topics scoped into the EIA		
Air Quality	The energy efficiency measures employed in the development such as highly efficient hybrid cooling system using water-cooled chillers. Glazed areas for the data hall were reduced so that solar gain is limited, minimising the cooling loads. Height of generator flumes - the generator flues terminate above roof level (41.6m, 46.6m, 56m or 40.2m above ground) at t height to maximise dispersion. Promotion of sustainable travel options through provision of cycle parking and pedestrian access.	The height of the flumes reduces air quality impact on nearby receptors by allowing greater dispersion of emissions. Promotion of sustainable travel seeks to reduce the vehicle trips generated by the Proposed Development, as such this reduces air quality impacts associated with vehicle emissions.
Climate Change and	The design of the proposed buildings has been developed to reduce its annual energy consumption.	The reduction in energy consumption will minimise the annual CO^2 footprint of the

Environmental Topic	Change	Influence on Environmental Impact and Effect
Greenhouse Gases	Passive solar considerations have formed an integral part of the design. Reducing glazing along with high performance U values are specified in order to minimise solar gains and heat transfer through the fabric so that associated cooling loads are minimised.	Proposed Development and reduce impacts on the global climate.
Other environmental topics		
Ecology	Retention of trees on the Site where possible. Green infrastructure forms a key element of the Proposed Development. Landscaping proposals including enhancement measures such a incorporation of brown bio-diverse roofs.	The retention of existing trees will reduce the loss of habitat and therefore adverse ecological impacts. Retaining mature trees around the boundaries of the Site increase screening from surrounding views therefore reducing both the short and long term visual impacts while the new planting proposed as part of the Proposed Development becomes established. Introduction of additional landscaping help to enhance wildlife on the Site and helping to achieve Biodiversity Net Gain (BNG) on the Site and reduce adverse ecological impacts.
Transport	Availability and promotion of sustainable transport options including the provision of cycle parking.	Reduce the environmental impacts associated with vehicle movements by raising travel awareness and minimising the number of car trips generated by the development.
Hydrology	Drainage Strategy - Design iterations to inform the layout of the Proposed Development have taken in to account the sensitivity of surface water flooding and attenuation. A small pond has been incorporated into the development adjacent to LON6. Rainwater recovery and re-use has been incorporated into the development for toilet flushing and landscape irrigation requirements.	Reduces adverse impacts and risk as a result of flooding. Measures to reduce water consumption on the Site will minimise adverse environmental impacts with in relation to water resources.
Noise	Installation of acoustic enclosures and barriers around noise emitting plant.	Reduction in adverse noise impacts on surrounding noise sensitive receptors.

Environmental Topic	Change	Influence on Environmental Impact and Effect
Townscape and Visual	Reduction of built form and implementation of the 'butterfly' design principle. External finishes and façade treatment on LON6 chosen to improve the external appearance.	Reduction in adverse visual impacts on surrounding area/properties and views.