Hayes Digital Park

EIA Non-Technical Summary

March 2025

Prepared on behalf of

colt
Data Centre Services

savills

Document title:	EIA Non-Technical Summary
Project:	Hayes Digital Park
Client:	Colt Data Centre Services

Contents

Non-Technical Summary

1. Introduction

Background

1.1 Colt Data Centre Services (the Applicants / Colt) are proposing to re-develop Hayes Bridge Retail Park and Heathrow Interchange Park (the Site) in the London Borough of Hillingdon.

1.2 The Proposed Development assessed within this Environmental Impact Assessment (EIA) consists of redevelopment of the Site to provide a new data centre campus with associated office space and innovation hub.

1.3 Savills has co-ordinated the preparation of the Environmental Impact Assessment (EIA) including the preparation of the Environmental Statement (ES) and Non-Technical Summary (NTS) (this document) to support the planning application. The NTS sets out the key issues and findings of the ES in an accessible format for the wider audience.

1.4 The ES and this NTS accompany a suite of documents that together support the hybrid planning application submitted to the Local Planning Authority (LPA), London Borough of Hillingdon Council ('LBH / the Council').

Environmental Impact Assessment

1.5 Environmental Impact Assessment (EIA) is a process that formally considers the construction and operational aspects of a proposal that may have significant effects on the environment. The findings of an EIA are described in a written report known as an Environmental Statement (ES). An ES provides environmental information about the scheme, including a description of the development, its predicted environmental effects and the measures proposed to mitigate adverse effects: information that is taken into account in the planning decision.

1.6 The ES has been prepared in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the 'EIA Regulations'). This document is the Non-Technical Summary (NTS), which provides a summary of the main findings of the ES, including the significant environmental effects, mitigation and residual effects predicted to result from the Proposed Development.

1.7 Subsequently, when the Council is deciding whether to grant planning permission, it can do so in the full knowledge of any significant effects predicted, and take this into account in the decision making process.

Screening

1.8 The EIA Regulations require that before consent is granted for certain types of development, an EIA must be undertaken. The EIA Regulations set out the types of development which must always be subject to an EIA (Schedule 1 development) and other developments which will only require assessment if they are likely to give rise to significant environmental effects (Schedule 2 developments). Guidance and thresholds are available to help to decide whether EIA is required for a Schedule 2 development. This decision process is known as 'screening'.

1.9 The selection criteria for screening Schedule 2 development are provided in Schedule 3 of the EIA Regulations. Schedule 2 projects require EIA if they are likely to have significant effects on the environment by virtue of their nature, size or location. The potential for likely significant

effects on 'sensitive areas', as defined in Regulation 2(1) of the EIA Regulations, is a particularly important consideration.

1.10 The Proposed Development falls within Schedule 2 Part 10 (a)"Industrial estate development projects". The criterion to be considered for Part 10 (a) Industrial Estate Development Projects is given in column 2 as "the area of the development exceeds 5 hectares."

1.11 The Proposed Development may also be considered to fall under Part 13(b) of Schedule 2 (changes and extensions to Schedule 2 developments) if the LPA considers this project to be an extension of the already consented data centre development, however the criteria for Part 13(b) would be the same as Part 10(a).

1.12 The area of this development proposal is on a site of around 4.5ha which is below the 5ha threshold. However, when considered in combination with the adjacent site to the south, the total area of both developments exceeds this. Whilst the development to the south does not form part of the Proposed Development and benefits from planning consent data centres under application 38421/APP/2021/4045, given the Applicant is the same and the potential for cumulative impacts, it was agreed with the LPA to screen the Proposed Development in this context.

1.13 During the preliminary stages of the EIA process, a request was made to the Council for its EIA a Screening Opinion to confirm whether the development was deemed to by EIA or not. The Screening Opinion received on 25 October 2024 confirmed the Proposed Development would qualify as EIA development

Scoping and EIA Consultation

1.14 A formal scoping exercise has not being undertaken. Within the Screening Opinion, and through subsequent discussions with LBH, a clear indication and steer was provided on the required scope. Notwithstanding this, separate technical discussions have been held as part of the pre-application consultation to confirm the assessment scope for the topics scoped into the EIA.

1.15 Following the internal scoping exercise and through consultation with the LPA, the scope of the EIA comprises of the following technical topics:

- Air Quality
- Climate Change

1.16 In line with best practice, this is considered to be proportionate to the likely significant effects of the Proposed Development.

EIA Approach

1.17 A hybrid planning application has been submitted for the re-development of the Site which seek consent for both detailed elements and outline parameters. As such some elements of the Proposed Development are set out in detail, such as the design, layout, appearance, and use, whereas for the outline elements consent is sought for broad aspects and principles of the Proposed Development such as the scale, location, and access), with detailed proposals to come forward during subsequent reserved matters applications.

1.18 Alongside the Proposed Development the demolition of the existing buildings on the Site and the delivery of the Substation 2 have been assessed, albeit these are consented developments. Given the timing, nature and relationship of the Proposed Development and the consented developments on the Site, for the purposes of this EIA this has formed part of the development

assessed. Whilst these are consented, and therefore would constitute cumulative development, this approach has ensured a robust and comprehensive assessment has been undertaken.

1.19 Given the nature of the application, the assessments have been undertaken on the basis of Outline Parameter Plans alongside detailed plans. For the outline elements of the Proposed Development illustrative details have been prepared, for example with regards to landscape design. These show one way in which the development could come forward within the proposed parameters. However, the EIA has principally been based upon the outline parameters. Where illustrative detail has been referred to this is clearly stated.

1.20 The overarching objective is to ensure that the Local Planning Authority has the information it requires in order to make a reasoned conclusion on the likely significant environmental effects of the Proposed Development when reaching a decision.

1.21 The following scenarios have been assessed:

- Baseline/Future Baseline
- Baseline/Future Baseline + Proposed Development
- Baseline/Future Baseline + Proposed Development + Other Committed Development

1.22 The above scenarios are necessary to demonstrate the impacts, effects and necessary mitigation required to deliver the Proposed Development.

2 Site and Local Context

Site Description

2.1 The Site comprises two land parcels with a combined area of approximately 4.5 hectares (ha), separated by Bullsbrook Road, an adopted highway serving other premises in the wider commercial area.

2.2 As seen in Figure 2.1 below, the northern parcel, north of Bullsbrook Road, is roughly rectangular and contains several units forming part of Hayes Bridge Retail Park. The park includes a terrace of seven retail units and a standalone Metro Bank, arranged around a central surface car park accessed from Uxbridge Road. The retail terrace is two storeys, while the bank is single storey and more recently constructed. The park is increasingly derelict, with vacant units. It is bounded by Uxbridge Road to the north, Yeading Brook to the east, Bullsbrook Road to the south, and a site with planning permission for a hotel (ref. 69827/APP/2021/1565) and the Hyatt Hotel to the west.

2.3 The southern parcel is known as Heathrow Interchange Park and is situated south of Bullsbrook Road. It comprises four industrial units arranged in two north-south oriented terraces, separated by a yard providing parking and vehicle turning, accessed from Bullsbrook Road. It is bounded by Bullsbrook Road to the north, Brook Industrial Estate to the east (being redeveloped for two data centres (ref. 38421/APP/2021/4045)), and a business park to the west.

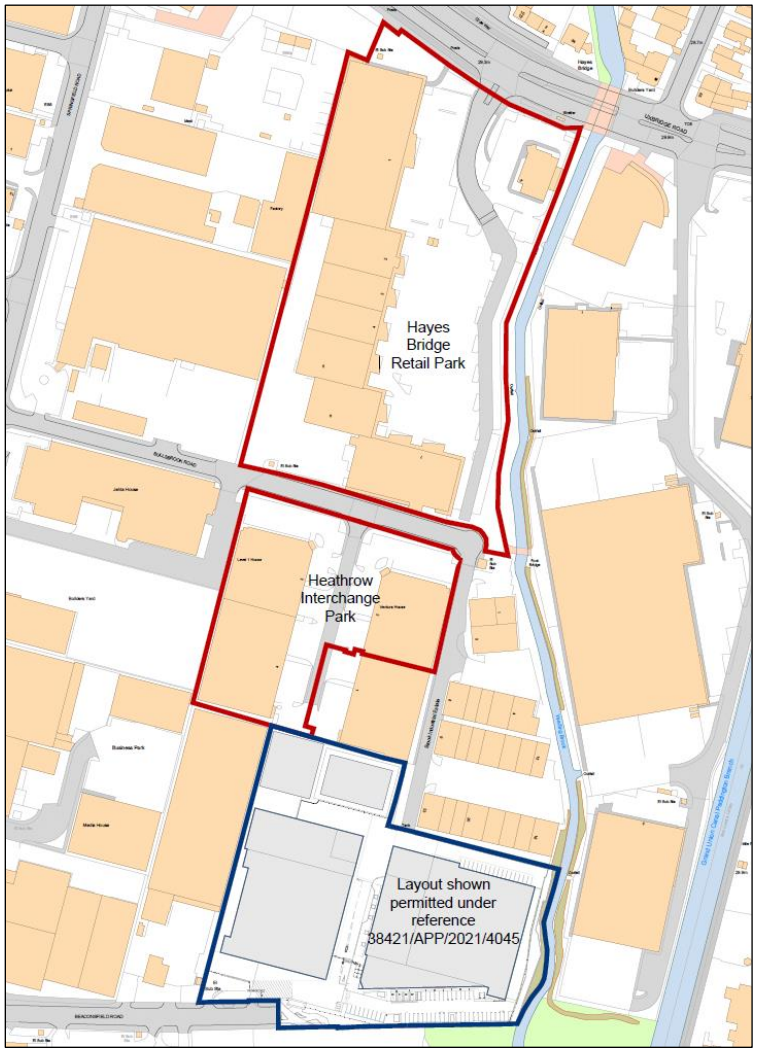
2.4 Site levels are generally flat, with elevations varying between approximately 30.00m and 28.4m AOD.Geological mapping indicates the western part of the Site is underlain by Langley Silt Member (clay and silt), the southern part by Lynch Hill Gravel Member (sand and gravel), and no superficial deposits in the east. The underlying formation is London Clay.

Site Location and Surrounding Features

2.5 The location and extent of the Site is identified by the redline shown on Figure 2.1 below (see separate Figure 2.1 to view the full size drawing XXX-NWA-S1-ZZ-DR-A-01-000 Rev 02). The Site is located on the urban fringes of Hayes and Southall circa 1.1km West of Southall town centre, circa 1.6km East of Hayes Town centre and, circa 4.3km North East of Heathrow Airport. It is within the London Borough of Hillingdon, Greater London. The wider area of Hillingdon features diverse developments, including Uxbridge and Hayes town centres, suburban housing, Brunel University, retail parks, industrial areas, RAF Northolt, and Heathrow International Airport.There is a Public Right of Way (PRoW) near to the Site. The Hayes Towpath: 'Bulls Bridge to Yeading Lane' runs alongside the Grand Union canal to the East of the Site

2.6 The Site is mainly within Flood Zone 2, posing a medium flood risk according to EA flood mapping. The adjacent Yeading Brook, a statutory main river, runs along the eastern boundary. Most of the Site has a low risk of surface water flooding, though some areas face low to medium risk (up to a 3.3% annual chance). The nearest water features are the Yeading Brook and the Grand Union Canal, both flowing north to south. About 1.5 km south, the Yeading Brook intersects another section of the canal.

Figure 2.1 Site Location Plan



2.7 There are no active potable groundwater abstractions within a 1km radius and the site is not located within a groundwater Source Protection Zone (SPZ).

2.8 The Site is located within the LBH Air Quality Management Area (AQMA), which runs from the south boundary of the Borough up to the railway line north of the A40, comprising approximately two thirds of the borough.

2.9 The baseline noise environment is primarily influenced by traffic noise from nearby roads, particularly the A4020 Uxbridge Road and Hayes Bridge Retail Park, with consistent traffic throughout the day. Additionally, railway noise and airplanes from Heathrow are likely to contribute to the background noise at the Site.

2.10 The Site has no statutory or non-statutory ecological designations. The nearest statutory designation is Yeading Meadows Local Nature Reserve, about 1.66 km northwest. The closest non-statutory designation is the Yeading Brook, Minet Country Park, and Hitherbroom Park SINC, located along the eastern boundary. Safeguarding measures are proposed for these areas.

2.11 The Site contains commercial and storage buildings, hardstanding areas, grassland, ornamental planting, and several trees. The Yeading Brook river corridor and its woodland form the eastern boundary, while a single hedgerow is present in the southeast. The brook and woodland will be retained and safeguarded, while the hedgerow will be removed and replaced with native species-rich planting.

2.12 Additionally, London's Canals SINC is located 130m east of the Site. Although the Site is within a Natural England Impact Risk Zone (IRZ) related to nearby SSSIs, the type of development proposed does not require consultation with Natural England.

2.13 The Site is not within a Local Authority Archaeological Priority Zone and contains no nationally designated sites, such as Scheduled Monuments or Registered Parks and Gardens. The nearest heritage asset to the Site is the Grade II listed Church of St George, located about 570m northeast. The South West Canalside Conservation Area is approximately 180m east, covering most of the Grand Union Canal within Ealing, except for a section between Norwood Top Lock and Hanwell Locks.

Figure 2.2 Ariel view of the existing Site

3 Proposed Development

3.1 Studio NWA are the lead appointed architects and have designed the Proposed Development, working alongside a multi-disciplinary team of consultants.

3.2 As stated above, the Proposed Development consists of the redevelopment of the Site to provide a new data centre campus with associated office space and innovation hub. The Current Metro Bank building in the north of the Site will be retained.

3.3 A separate planning application for the enabling works will be submitted consisting of Removal of drainage infrastructure; Removal of slab / foundations; Remediation; and Installation of temporary substation. The enabling works have been considered within the EIA as part of the wider construction works and will be undertaken in advance of the wider redevelopment of the Site.

Redevelopment works

3.4 A hybrid planning application for the main redevelopment works has been submitted which provides detailed designs for some elements of the proposals whilst outline permission is sought for other elements.

3.5 The description of development for the hybrid planning application is:

Hybrid planning application for a four-phased redevelopment to deliver a data centre campus comprising of:

Phase 1 – Full planning permission for (a) a data centre building (b) energy, power, and water infrastructure (c) site access and internal roads including a vehicular and pedestrian link between Uxbridge Road and Bullsbrook Road (d) site security arrangements and security fencing (e) hard and soft, green and blue, infrastructure and (f) other ancillary and auxiliary forms of development;

Phase 2 – Outline planning permission for (a) an Innovation Hub (b) hard and soft, green and blue, infrastructure and (c) other ancillary and auxiliary forms of development;

Phase 3 - Outline planning permission for (a) a data centre building (b) energy, power, and water infrastructure (c) internal roads (d) site security arrangements and security fencing (e) hard and soft, green and blue, infrastructure and (f) other ancillary and auxiliary forms of development; and

Phase 4 - Outline planning permission for (a) a data centre building (b) energy, power, and water infrastructure (c) internal roads (d) site security arrangements and security fencing (e) hard and soft, green and blue, infrastructure and (f) other ancillary and auxiliary forms of development."

3.6 Full planning permission is sought for a data centre building (known as LON6) and outline planning permission for two further data centre buildings (known as LON7 and LON8) and the Innovation Hub.

Figure 3.1 CGI View from Uxbridge Road, looking toward LON6

LON6 (detailed proposals)

3.7 As part of the detailed submission, the following works are proposed:

- The erection of a data centre (Class B8) 'LON6' up to 41m high, with a Gross External Area (GEA) of approximately 24,072 sqm gross external area
- Associated plant and infrastructure including 2 transformers
- Hard and soft landscaping features as well as rooftop planting

3.8 LON6 is a five-storey data centre building, with a basement and plant roof equipped with cooling units. It comprises 25,235 sqm GEA and has a maximum height of 41.6m albeit the office / administration building would have a lower maximum height than the two data hall wings at 37m.

3.9 The data centre is designed as a butterfly configuration which consists of the data halls split into two wings, either side of a central administration / office core with the office core extending eastwards beyond the eastern edge of thew two data centre wings to add variety to the building line when viewed from Uxbridge Road. Where the office / administration core extends eastwards beyond the line of the two data wings, loading bays are created to the west and between the two data wings.

3.10 The associated fuel tanks are located at basement level, with access from two goods lifts and a staircase. Ground floor level is where the reception / security checkpoint is located. Back of house areas, including a loading bay, temporary storage for racks, asset management office, are all within close proximity to the circulation core where the goods lifts are located with access to all other levels.

3.11 The north and south wings at ground floor level are allocated to generators for backup power supply, as well as electrical switch rooms and incoming fibre rooms.

3.12 Level one and two comprise typical data halls at the north and south wings, integrated with cooling corridors. The centre block is dedicated to circulation cores, toilets and office accommodations. Level three is intended for the mechanical and electrical plant rooms required

to support the data hall functions allocated to the floors above and below. Level four follows a similar layout as levels one and two, with data hall wings and office accommodations to the connecting building block.

3.13 Level five comprises the remaining mechanical and electrical rooms to support the data hall levels, and level six and roof level is where the chiller gantry is proposed.

3.14 Plant is located at roof level above the data wings with a staff amenity garden and areas of brown roofing under PV located above the office / administration core.

3.15 LON6's façade treatment has been selected to align with the design ethos to provide high quality, durable and resilient materials to express the high-tech data centre function of the buildings. The material palette compliments that of the adjacent LON4 and LON5 data centre buildings, to ensure design continuity and high-quality materials.

3.16 As part of the detailed proposals a series of buildings that are ancillary and auxiliary to the functions of the data centres are proposed including gatehouse (see drawing LONUX-NWA-PL-00-DR-A-12231) and two transformer units (see drawing LONUX-NWA-PL-00-DR-A-12230) that will service LON6.

Table 1– Maximum eights and floorspace for LON6

Building	Maximum Height	GEA	GIA	Application Type
LON06	41.600 m	25,235 sqm	24,114 sqm	Full

Innovation hub, LON7 and LON8 (outline proposals)

3.17 For the outline areas, the following works are proposed:

- A data centre (Class B8) 'LON7', with a maximum height of up to 56m
- A data centre (Class B8) 'LON8', with a maximum height of up to 40m
- A technology start-up centre (Sui Generis) fronting Uxbridge Road, up to 28m high (marked as innovation hub on Parameter Site Plan - Land use);
- Access to the Site via Uxbridge Road and Bullsbrook Road with associated internal access arrangements and parking;
- Landscaped areas, planting and the formation of a wildlife corridor
- Other associated works including the formation of a gated entrance, structural landscaping and public realm enhancements

3.18 The Innovation Hub will consist of a mix of office, workshop, meeting, break-out, and Research and Development (R&D) spaces, as well as an ancillary café / coffee shop / restaurant. In terms of Use Class, the Innovation Hub would comprise a mix of Class B2, Class B8, Class E(g), Class F1, and Class F2(b) with a modest ancillary Class E(b) element.

3.19 For the outline elements the maximum quantums above have formed the basis of the assessments within the EIA. Parameter plans showing the broad spatial areas of development have been prepared.

Figure 3.2 CGI View toward LON6 east elevation

Figure 3.3 Land use parameter plan

Access and movement

3.20 The proposed access and highways arrangement aims to create a safe and secure site whilst also creating safe and accessible links to the surrounding area. The scheme provides safe and convenient access for servicing and refuse vehicles and the emergency services to ensure minimal disruption to the local highway network.

Vehicular Access

3.21 The main vehicular access to LON6, LON7 and the Innovation Hub is via the existing access to Hayes Bridge Retail Park off Uxbridge Road and internal access road. A new vehicular access is proposed, to be installed via Bullsbrook Road. The central access road will be gated to prevent through traffic other than by site occupants.

3.22 An internal road that runs north to south through the Site is proposed to facilitate vehicular movement between data centre buildings, where Bullsbrook Road acts as an egress point and secondary access, should the buildings be operated by different companies.

3.23 Vehicular access to LON8 of Bullsbrook Road will either be via the internal access road or by Bullsbrook Road via Springfield Road.

Pedestrian and Cycle Access

3.24 Pedestrian access to the Site is currently provided by a network of footpaths along main roads in the vicinity of the Site, including Beaconsfield Road, Bullsbrook Road, Springfield Road and Uxbridge Road. There are also a number of existing network of footpaths through Minet Country park which connects the Site to Hayes Town centre.

3.25 The Site is also connected to the wider area via cycleways, including advisory cycle lanes marked on both sides of Beaconsfield Road and on the eastern side (southbound) on Springfield Road between Beaconsfield Road and Bullsbrook Road and shared footway/cycleways are provided in sections of Springfield Road without in-carriageway advisory cycle lanes.

3.26 The Proposed Development will provide high quality and safe pedestrian and cycle routes and connections to the wider area, utilising these existing connections to encourage staff and Site users to use active travel modes.

Car and Cycle Parking

3.27 The redevelopment proposes to provide vehicular parking on Site inline with the London Plan Policy requirements. A total of 153 parking spaces are proposed, including 11 accessible bays (7% of total provision) and 8 (5% of total provision) active EV charging spaces. The proposals also include cycle parking at level recognised as suitable and sufficient for Data Centres, which due to the nature of data centre use is bespoke to the development type.

3.28 For LON6, it is proposed that total of 20 cycle parking spaces (10 Sheffield stands) are provided. These spaces will be split evenly between internal and external stores to cater for short and long stay journeys. The facilities will accommodate cargo bike deliveries as well as potential visitors.

3.29 Whilst cycle parking provision for the outline elements of the proposal (LON7, LON8 and the Innovation Hub) will be subject to consideration through a subsequent reserved matters application, these will be provided in line with BREEAM requirements of 1 space per 10

occupants (10% of the total occupancy) as a minimum. This would equate to a minimum provision of 29 additional spaces, or 49 across the Site.

Public Transport

3.30 The Site is located in an area with relatively poor public transport accessibility due to natural features including the Minet Country Park, Yeading Brook and Grand Union Canal, albeit it is located nearby existing by bus routes (<0.5-1 mile) and is located within a 30-min walk to two train stations. In order to improve this, the Framework Travel Plan has been prepared which seeks to inform and promote usage of non-car-based modes of travel to staff.

Deliveries, Servicing and Refuse Vehicles

3.31 The Proposed Development looks to utilise a similar arrangement to the existing access for delivery, servicing and refuse vehicles. These vehicles are currently able to access the Site via Uxbridge Road, Springfield Road and Beaconsfield Road, along the same routes other vehicles use.

3.32 The Proposed Development will ensure safe and efficient access for these vehicles is retained, ensuring they enter and leave the Site in a forward gear. It is proposed that when vehicles arrives at the Site, they will access via security gates and the driver will be directed to the service yard in the building they are visiting where goods will be unloaded by the driver and distribution to the customers. This will help minimise disruption.

Landscaping, open space and public realm

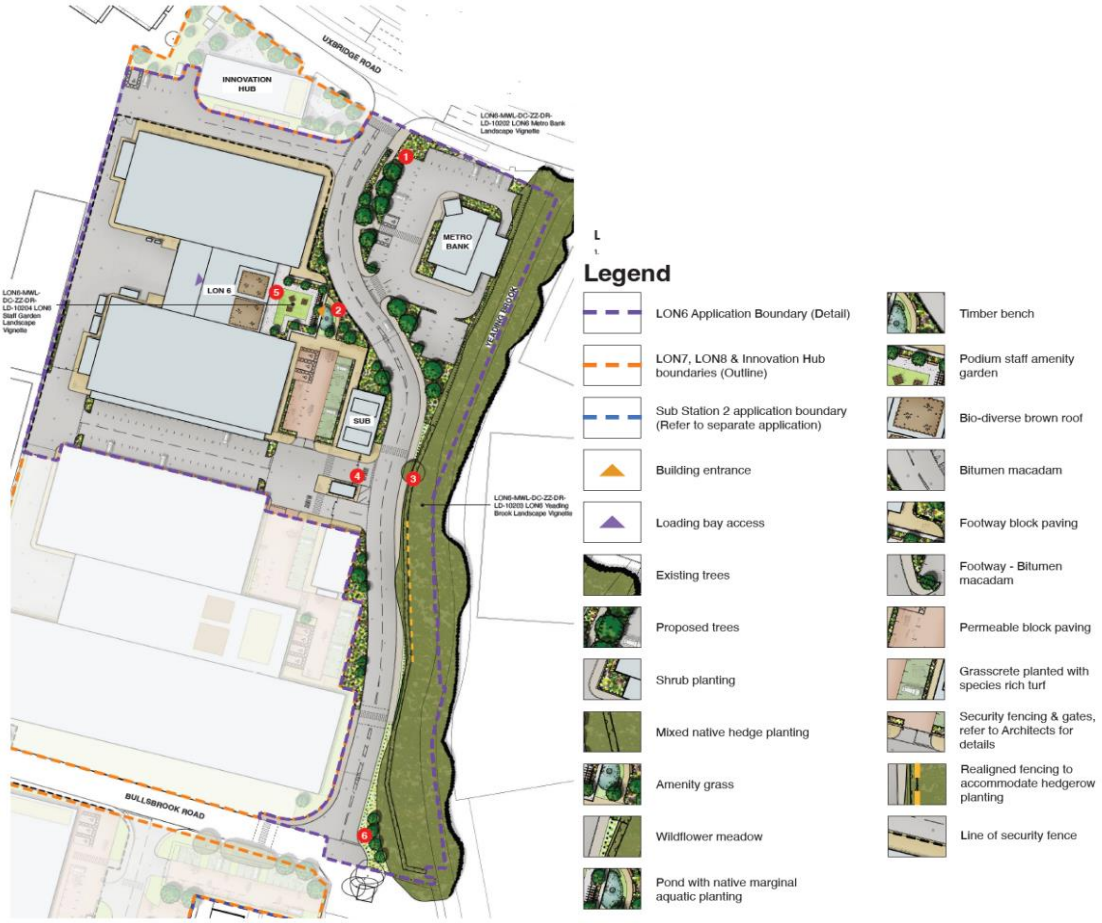
3.33 The Proposed Development includes a detailed landscape scheme for the full element of the proposals as well as indicative proposals for those elements where outline permission is sought.

LON6 (detailed proposals)

3.34 Detailed landscaping proposals have been developed for LON6. Key features of the landscape design include:

- Proposed shrub and tree planting to Metro Bank boundary, softening the perimeter of the car park, whilst also offering views from Uxbridge Road towards the Metro Bank signage and building.
- Staff amenity garden with natural pond, landscaping and seating. Shrub and tree planting along the roadside to provide some visual screening along the security fencing and road, whilst following the security requirements of landscaping near the fencing.
- Proposed footpath link along Yeading Brook, outside of the Root Protection Zones. Proposed mixed native hedgerow planting and deadwood along the top of bank.
- Opportunity for brown roofs to enhance the biodiversity of the roofscape.
- The existing vegetation along Yeading Brook will be preserved and actively managed to improve its ecological function. Enhancements will include the introduction of deadwood along the top of the bank, native hedgerow planting, and wildflowers grassland along the perimeter of the exiting fence.

Figure 3.4 Detailed Landscape proposals



Innovation hub, LON7 and LON8 (outline proposals)

3.35 A Site Wide Landscape Design Statement has been prepared by Murdoch Wickham which sets out illustrative landscaping measures.

3.36 The design integrates a series of landscaped spaces around the perimeter of buildings and parking areas, featuring shrub, and tree planting. Dedicated amenity staff gardens will provide workers and visitors with space to relax and enjoy, offering seating, vibrant planting and an ecological pond. Additionally, planting along the security fence will help screen the fencing and soften views of the data centre buildings.

3.37 The Innovation Hub parcel of the Site is inherently the most publicly facing portion of the Site given its proximity to Uxbridge Road. Thus parcel provides an opportunity for strategic street tree planting along Uxbridge Road to filter views of the Innovation Hub as well as a location for the incorporation of public art.

3.38 The proposed landscaping works include:

- Retained trees on the boundary with Uxbridge Road and including trees associated with the Yeading Brook along the eastern boundary of the Site

- New public realm tree and shrub planting appropriate to location and function, using native trees species and pollinator friendly shrub species to provide the setting to the proposed access road and built form; roof terraces feature shrubs and perennials in raised beds
- New native hedgerow to provide boundary structure and soften security fencing following the western edge of the area of the Yeading Brook
- Amenity lawns to provide open space and areas of wildflower grassland with mown margins to enhance seasonal visual interest and biodiversity; reinforced grass surfacing to soften the appearance of car parking areas
- New pond with marginal planting within the amenity area
- Yeading Brook, including existing trees and understorey, channel and marginal vegetation will be positively managed and enhanced through additional planting for ecological and biodiversity benefits.
- Employees roof terraces with planting and soft landscaping.
- Brown roofs (and photovoltaic panels) in areas of the roofs of the proposed buildings.

Drainage strategy

3.39 A Drainage Strategy has been prepared for the Proposed Development by ARUP

3.40 The surface water drainage system has been designed in accordance with best practice and guidance.

Surface water

3.41 Sustainable drainage system (SuDS) features have been incorporated into the designs where possible. This includes the use of permeable surfaces in external areas where traffic loading and site operational requirements allows.

3.42 Rainwater recovery and re-use has been incorporated into the development for toilet flushing and landscape irrigation requirements. Green roofs have been incorporated where roof top plant allows.

3.43 Due to the operational demands of the Proposed Development, planting and green space is limited. In addition, below ground utility routes are extensive, limiting the potential to provide deep SuDS features requiring under drains. Traditional drainage systems will be required in some locations due the operational requirements of the Site.

3.44 There is insufficient width and space to provide large open water features such as detention basins and swales. A small pond has been incorporated into the development adjacent to LON6. Tree pits and small rain gardens receiving runoff from adjacent surfaces will be incorporated into the landscaping proposals where below ground utility constraints and operational demands permit.

3.45 Permeable surfaces have been provided to car parking areas. The surfaces will be concrete/grass or block paved, with a permeable sub-base. Permeable surfaces were considered for other trafficked areas but discounted due to anticipated heavy vehicle loading. Below ground storage has been provided in the form of geocellular storage tanks.

Foul Water

3.46 A new foul water drainage system has been provided to convey foul flows from proposed buildings to the exiting Thames Water public sewers in Uxbridge Road and Bullsbrook Road. Existing private connections to the public sewers will be retained and reused.

Energy and Sustainability

3.47 An Energy and Sustainability Statement has been prepared by Cundall. This provides an outline of the proposed sustainability measures for the Site.

3.48 From the inception of the project Colt and its design team have strived for the highest environmental performance possible for the proposed data centre use.

3.49 Similar design measures and strategies in the campus development were applied for each building block, and a proposed centralized waste heat energy system is outlined within the report to showcase its potential contribution to campus development.

3.50 A brief summary of the energy hierarchy measures are set out below:

- **Be Lean**: passive and energy efficiency measures contributing to the energy strategy including designing the building envelope to reduce thermal loads on HVAC systems, glazed areas for the data hall are minimal to reduce solar gain and reduce the pressure on cooling systems, energy efficiency measures to be employed in the development, high efficacy lighting coupled with occupancy sensors and electrical and mechanical systems to be monitored, metered and controlled through management systems.

- **Be Clean**: Waste heat energy from data halls to be utilised to heat other areas of the Site or exported to the local area design to allow district heat connection in the future if this becomes viable.

- **Be Green**: Solar PV to be utilised on site where possible and utilising effective cooling systems to reduce carbon emissions.

- **Be Seen**: Unregulated energy was estimated and reflected in the GLA calculation spreadsheet and the corresponding emission is reviewed in Whole Life Carbon Assessment.

Circular Economy

3.51 A Circular Economy Statement has been produced by Savills. This statement sets out the development's circular economy strategy and the project's circular economy aspirations and commitments.

3.52 The Proposed Development aims to achieve sustainability far in excess of minimum standards. To facilitate this and provide a metric against other buildings, BREEAM 'Excellent' certification will be targeted.

Whole Life Carbon

3.53 A Whole Life Carbon Assessment (WLCA) for the Proposed Development has been prepared by Savills. The WCLA has been completed in order to recognise and encourage measures to optimise the construction product consumption efficiency, and to utilise products with a low environmental impact, including embodied carbon, over the life cycle of the building.

Utilities

3.54 A utilities report has been produced by Cundall. The Site is previously developed so benefits from some existing utilities connections including a connection to the public sewer and a storm drain to the east of the Site.

3.55 The power requirements and other utilities necessary for the operation of the Site have been identified and assessed within the utilities report and enquiries have been made with the necessary statutory undertakers and utility service providers will be made.

3.56 As part of the Proposed Development, the following new services will be routed into and around the Site:

- High voltage (HV) Electricity
- Medium and Low Voltage (MV & LV)
- Communications Infrastructure
- Potable Water
- District Heating
- Foul Water Drainage

3.57 The delivery of the consented substation (Substation 2) will help ensure a reliable power supply to suit the operation requirements of the operator.

Lighting Strategy

3.58 An external masterplan lighting strategy has been produced which for the Proposed Development.

3.59 The strategy aims to deliver a high quality and sensitive lighting scheme which meets the operational requirements of data centres in consideration of best practice guidance and regulations for lighting design.

Site Security

3.60 Key to the successful operation of a data centre campus is security and this is only emphasised following the inclusion of data centres as Critical National Infrastructure.

3.61 Full planning permission is sought for the security fencing for LON6 with outline planning permission sought for the fencing for LON7, LON8, and the Innovation Hub. Fencing for the Site is to be 2.4m in height with black welded mesh panels. This fencing type, height, and colour matches that of LON4 and LON5. A series of gates are also incorporated.

Consented Development

3.62 Alongside the Proposed Development the demolition of the existing buildings on the Site and the delivery of the Substation 2 have been assessed, albeit these are consented developments. Given timing, nature and relationship of the Proposed Development and the consented developments on the Site, for the purposes of this EIA this has formed part of the development assessed. Whilst these are consented, and therefore would constitute cumulative development, this approach has ensured a robust and comprehensive assessment has been undertaken.

3.63 The existing buildings on Site will be demolished. Whist this work has been consented via separate prior approval notifications (Ref: 1911/APP/2025/398 and 71554/APP/2025/466), to ensure robustness this has been included within the assessed development for the EIA.

3.64 With the exception of the existing Metro Bank Building in the north east of the Site, the remaining units within the Site will be demolished to enable the redevelopment of the Site. The scope of the works involves the structural demolition of all the existing buildings, features and services on the Site. Trees / shrubs will removed from the Site boundaries in to facilitate works and any retained trees will be protected throughout the works.

3.65 Consent has been granted for the redevelopment of part of the Site to deliver a substation in connection with the permitted data centre campus to the south of the Site (LPA ref: 71554/APP/2025/47) and the proposed data centre campus.

Construction and implementation

3.66 This section describes the anticipated programme of demolition and construction works and the key activities that will be undertaken prior to completion and occupation of the Proposed Development.

Construction Duration

3.67 The Proposed Development is expected to be delivered in phases. The demolition and enabling works and substation development will occur in advance of the main redevelopment of the Site.

3.68 Indicative phasing for the redevelopment works is as follow:

- Phase 1 – LON06
- Phase 2 – Innovation Hub
- Phase 4 – LON07
- Phase 4 – LON08

3.69 The indicative construction phasing is considered to be in line with the below

- Demolition – Commence on Site May 2025
- Enabling Works Commence on Site – December 2025 to June 2026
- LON6 works – Start on Site – June 2026
- Completion – 2029

Construction Environmental Management Plan (CEMP) and Construction Logistics

3.70 Details of measures to protect the environment during the construction of the Proposed Development will be set out in a CEMP which will be prepared. Measures will address hours of working, noise, vibration, dust, light spill, wheel washing and control of runoff. It is anticipated that the implementation of the CEMP will be a condition of the planning permission and that it will be regularly monitored.

3.71 Once finalised and approved by the Local Planning Authority, the CEMP would be held on-site. All site personnel would be made aware of its existence and undertake to adhere to the guidance.

3.72 An Outline Construction Management Plan (OCMP) has been prepared which framework and principles relating to management of proposed construction works at the Site. It covers both the outline and detailed areas of the Site, describing in high-level how the applicant and contractor will manage the construction works, including engaging with existing surrounding communities, residents and businesses through a Community Liaison Group.

Background, Alternatives and Design Evolution

Consultation

3.73 Consultation specifically relating to the EIA has been undertaken throughout the development process to date. This has included various pre-application discussions with statutory and non-statutory consultees and the local community.

Alternatives and Design Iteration

3.74 Schedule 18, Paragraph 3(d) of the 2017 Regulations requires an Environmental Statement (ES) to describe any reasonable alternatives considered by the developer, relevant to the proposed development and its characteristics, along with the rationale for the chosen option, considering environmental impacts.

3.75 The regulations do not mandate a full assessment of all possible alternatives, only a reasonable review of those genuinely considered before submitting the planning application.

3.76 Since no suitable alternative sites are under the Applicant's control in this location, site alternatives were not assessed in the Environmental Impact Assessment (EIA), as they would not be deliverable. Instead, the assessment of alternatives focused on two realistic options:

- '**Do Nothing' Scenario**: The site remains unchanged, maintaining current baseline conditions. Given the increasing demand for data centres as essential infrastructure, this scenario would mean forgoing the economic benefits associated with the Proposed Development during both construction and operation. The site's existing uses would also remain underutilised.

- **Alternative Design**: The Proposed Development could take different forms in terms of layout, scale, and configuration, within site constraints. An iterative design process, shaped through stakeholder consultation, informed decisions on building layout, height, and land use. Stakeholder feedback was incorporated at each stage of the design process.

3.77 The EIA Regulations (Schedule 4, Paragraph 2) require Environmental Statements to describe reasonable alternatives considered in terms of design, technology, location, size, and scale, along with the reasons for selecting the preferred option, including a comparison of environmental effects.

3.78 The Proposed Development has been designed to minimise environmental impact and, where possible, incorporate environmental enhancements. The design process involved ongoing consultation with local authorities and technical experts, ensuring that stakeholder feedback and embedded environmental mitigation were integrated into the final design.

4 Findings of the EIA

Air Quality

4.1 The baseline air quality conditions at the Proposed Development and surroundings were assessed via a desktop review; the potential for any significant environmental effects were assessed using qualitative and quantitative methodology; and mitigation measures required to prevent, reduce, or offset any significant adverse effects were identified.

4.2 A qualitative assessment of the construction phase dust impacts has been undertaken following guidance published by the Institute of Air Quality Management (IAQM). Following the implementation of recommended mitigation measures, no significant effects are expected.

4.3 The mitigation of construction phase pollutant and dust emissions will be addressed by an appropriate Construction Environmental Management Plan, developed by the main contractor. Several Best Practicable Means (BPM) construction dust emissions mitigation measures have been proposed for adoption.

4.4 Dispersion modelling has demonstrated that operation of the generators associated with the routine testing and maintenance will not present a significant impact to nearby sensitive receptors. Therefore, no further mitigation is required subject to a control over the maximum hours of use of the generators.

4.5 Dispersion modelling based on a worst-case emergency scenario of 33 hours of operation has indicated that the annual mean objectives would not be exceeded. Impacts at all modelled receptor locations are negligible to slight. In addition, the 24-hour objective for particulate matter (PM10) is also not expected to be exceeded. Predicted short-term nitrogen dioxide (NO2) concentrations exceed the 1-hour mean NO2 objective (200 µg/m3) at all receptors in the initial hour (20 minutes warm-up time for the SCR). In subsequent hours (SCR fully operational), predicted concentrations do not exceed the 1-hour mean NO2 objective (200 µg/m3), apart from Receptors C3, C4 and C5, which do slightly exceed the objective. In line with EPUK/IAQM guidance, impacts at all modelled receptor locations are substantial in the initial hour, and moderate to substantial in subsequent hours. The emergency scenario of 33 hours has been run for each of the three meteorological years (2021, 2022 and 2023) and the maximum of the 100th percentile results has been used in the results processing. An emergency scenario of 33 hours is considered to be a conservative assumption, as in the unlikely event of a mains power outage, it is expected that any loss of mains power will be quickly resolved. It is therefore anticipated that the emergency operation of the generators would only be for a short duration.

4.6 As such, there is no requirement for mitigation beyond the best practice design measures highlighted above under the ‘Air Quality Positive Statement’ section.

4.7 As there are no emissions associated with the main energy provision, it can be assumed that the building emissions will meet NO2 and PM10 benchmark values and therefore the Proposed Development is likely to be “air quality neutral” with respect to building emissions.

4.8 The predicted annual trip generation associated with the Proposed Development does not exceed the Transport Benchmark. It is therefore concluded that the Proposed Development is likely to be “air quality neutral” with respect to transport emissions.

4.9 Overall, the impact of the Proposed Development is considered to be **negligible** with regards to emissions of NO2, PM2.5 and PM10, and the overall effect is considered to be **‘not significant’**.

Climate Change and Greenhouse Gases

4.10 An assessment was undertaken on the potential impacts of the Proposed Development on greenhouse gas (GHG) emissions and climate change. The assessment considers the GHG emissions resulting from both the construction and operational phases of the Proposed Development, as well as how the development could be affected by climate change over its lifetime. The aim is to ensure that the project aligns with national and local decarbonisation targets, while identifying any potential significant effects and necessary mitigation.

4.11 The baseline conditions reflect the existing level of GHG emissions associated with the Site before development. The annual estimated emissions associated with the current site use has been determined to be **560.9 tCO2e**. This serves as a reference for comparing the potential emissions of the Proposed Development.

4.12 During the construction phase, GHG emissions are expected to arise from activities such as site preparation, demolition and construction processes, particularly from fuel consumption in machinery and temporary energy use. However, these emissions will be temporary and limited in scale compared to the operational emissions of the Proposed Development over its lifetime. Standard industry best practices, such as using grid electricity where feasible and optimising logistics, will help reduce emissions. As a result, the overall effect during construction is expected to be **Negligible** and **Not Significant** in line with IEMA guidance.

4.13 The operational phase of the Proposed Development is expected to lead to a relatively large level of GHG emissions due to the high energy consumption required for IT operations and cooling systems. The total estimated operational GHG emissions over the Proposed Development's assumed 60-year lifetime are approximately **994,781 tCO2e**. However, the Proposed Development incorporates several inherent mitigation measures, including high-performance cooling systems, on-site solar energy generation and waste heat recovery. These measures will help reduce emissions, ensuring the development aligns with the UK's net zero trajectory. While the emissions account for 35.1% of the London Borough of Hillingdon's carbon budget over the operational period, the national-level impact is considered as **Minor Adverse (Not Significant)**, while the local impact is assessed as **Minor** to **Moderate Adverse (Potentially Significant)** due to the proportion of the local carbon budget consumed.

4.14 No additional mitigation measures beyond those already incorporated into the current design Proposed Development are required. The Proposed Development includes several inherent mitigation strategies, such as energy-efficient building systems, on-site renewable energy generation and hybrid cooling systems. These measures are consistent with best practice standards and ensure that the Proposed Development aligns with the UK's trajectory to net zero. While the local impact on the carbon budget may increase due to the cumulative effect of other nearby developments, no further mitigation beyond what is already planned is considered necessary at this stage.

5 Cumulative Effects

5.1 The assessment has considered the potential for effects in combination with the cumulative developments identified through a review of planning applications and consultation with the LPA.

5.2 The cumulative assessment concluded that no significant adverse effects are likely to occur from the implementation of the Proposed Development with nearby existing or approved developments.

6 Conclusion

6.1 The ES has considered how the environment and the local community would be affected by the Proposed Development.

6.2 A range of likely effects have been predicted to occur as a result of the Proposed Development and mitigation measures have been identified either within the scheme design or additionally to minimise or offset identified adverse effects where possible. After the proposed mitigation is taken into account, there are no significant effects predicted to occur as a result of the Proposed Development.

Next Steps

6.3 The ES has been submitted alongside other documents in a planning application to the Council. Prior to making a decision, the Council will consult with relevant statutory and non-statutory bodies for advice on the proposals. Members of the general public are also welcome to make comments on the application during this time. The feedback from these consultations will be taken into account by the Council in reaching their decision.

6.4 A copy of the Environmental Statement on USB flash drive is available at a charge of £25.00. Enquiries in respect of these or printed copies of the ES and Appendices should be made to Savills: southamptonplanning@savills.com, or alternatively, telephone 01202 856 800.

Table 6.1 Summary for the assessment of effects during the demolition and construction period

Receptor/potential impact	Mitigation / enhancement	Residual Effect	Significant?
Air quality			
Sensitive human receptors - PM_{10}, $PM_{2.5}$ and NOx from on-site construction NRMM machinery	Specification of minimum NRMM emission requirements	Negligible	Not Significant
Sensitive human receptors - PM_{10}, $PM_{2.5}$ and NO_x from Construction traffic exhaust emissions	Mitigation measures during demolition, earthworks and construction appropriate for a medium risk site in accordance with IAQM guidance.	Negligible*	Not Significant
Sensitive human receptors - Dust and PM_{10} emissions associated with construction activities	Mitigation measures will be implemented via a Construction Environmental Management Plan (CEMP) to avoid, minimise or mitigate any construction effects on the environment in respect.	Negligible	Not Significant
Climate change			
Global Climate - Temporary GHG emissions from demolition and construction site energy use, material transport, and workforce travel.	No additional mitigation proposed beyond standard construction management best practices.	Negligible	Not Significant

***** Due to the phased nature of the development, it is considered unlikely that the construction traffic will exceed the criteria for detailed assessment and therefore residual effects are anticipated to be negligible.

Table 6.2 Summary for the assessment of effects of the completed development

Receptor	Mitigation / enhancement	Residual Effect	Significant?
Air quality			
Sensitive human receptors - Emission from testing and maintenance of the on-site generators	Embedded mitigation of locating flue heights at 41.6 m, 46.6 m, 56 m or 40.2 m above ground level. Limiting operating hours to required testing and maintenance schedule (12 hours per year per generator). Maximum of 4 generator to be tested at any given time.	Negligible / Slight	Not Significant
Climate change			
Global Climate - GHG emissions from operational energy use, contributing to local and national carbon budgets.	No additional mitigation proposed as the Proposed Development has been designed to align with UK net zero objectives and best practice standards.	Minor to Moderate Adverse	Not Significant (National Level), Potentially Significant (Local Level)

Charles McClea
Director
CMcClea@savills.com

Matt Lindon
Associate EIA Consultant
Matt.Lindon@savills.com