

SOUTHALL'S DATA CENTRE CLUSTER

Two approved hyperscale schemes, a wider pipeline, and the cumulative assessment none of them was given

A resident advocacy briefing covering Southall's two approved data centre schemes — Trident Way (250949FUL) and the former Honey Monster Food Factory site (253874FUL) — and the wider pipeline of schemes now emerging nearby — examining heat, air quality, carbon, and the environmental screening decisions behind both approvals

July 2026 · revised 1 August 2026 to incorporate the Honey Monster EIA screening documents

Summary

Southall is host to two large hyperscale data centre schemes, roughly a mile apart: Trident Way, led by Global Technical Realty (GTR), approved by Ealing Council in October 2025, and the former Honey Monster Food Factory site, led by CyrusOne, approved by the same committee in mid-July 2026. Both decisions are now made. Each carries a set of projected benefits — employment figures, business rates, brownfield regeneration, public realm works. Those figures are applicant estimates derived from standard national employment-density assumptions, and the obligations behind them were imposed by the council through Section 106 agreements rather than volunteered. They are commitments to be monitored, not outcomes already delivered. Taken together, the two schemes represent a concentrated new industrial heat and power load landing on one part of West London. Neither was assessed for what that concentration means — for heat, for air quality, or for a population already carrying documented health disadvantages. Ealing's own air quality consultant has separately found that one of the two schemes does not meet the standard it claims, and the other was screened out of Environmental Impact Assessment altogether on reasoning the council has not published. Neither gap has been addressed for the further data centre schemes already moving through planning nearby.

This briefing sets out what is confirmed, from primary sources, about each site individually, what remains unconfirmed or undisclosed, and why the two — and the wider cluster of schemes now emerging around them — should be considered together rather than in isolation. Every figure is sourced; where sources conflict or a figure could not be verified, that is stated.

The gap this briefing identifies isn't unique to Southall: it mirrors a live UK parliamentary debate about whether data centre regulation has kept pace with the sector's growth, developed fully in Section 6.

How confident should you be in each part of this?

Not every claim below carries the same evidential weight, and it's worth being explicit about that rather than leaving readers to work it out. Three different kinds of claim sit inside this briefing:

- **Externally corroborated.** Southall's heat vulnerability, the case for cumulative assessment, and the transparency gap around data centre environmental disclosure are not just this briefing's view — the Local Government Association told Parliament the same thing on 6 July 2026, the Mayor's Heat Ready London (June 2026) establishes the same citywide risk baseline, and the Climate Change Committee's national risk assessment reaches the same conclusion independently. This is the strongest tier of the argument, and where readers in a hurry should place the most weight. The same tier now includes something stronger still: Ealing's own appointed air quality consultant, in the council's internal consultee response within the Trident Way committee report, concluded the scheme does not achieve Air Quality Neutral status and is "not fully compliant" with London Plan Policy S11. That is not an external body corroborating this briefing's reading of the applicant's documents — it is the council's own record contradicting the applicant's claim outright, which places it above even the LGA/Mayor/CCC material in directness.
- **Original findings from primary documents.** The AQNA benchmark failure and ecological NO_x exceedance (now set out in the dedicated "Air quality and noise" section), and the Climate Baseline Report's internal inconsistency (Section 4), are numbers pulled directly from the developers' own submitted paperwork. Nobody else has flagged them yet — this briefing is the first to put them together — so they should be read as solid but unverified by any third party, not as a settled finding. Worth checking independently before repeating publicly. (A

further claim about a carbon-accounting discrepancy was investigated for this tier and could not be verified — see Section 5 — and is not included here or anywhere else in this briefing.)

- **Primary planning-process record.** The EIA screening documents for the Honey Monster site — CyrusOne’s Regulation 6(1) request of 29 April 2025, the Ramboll screening report it enclosed, and Ealing’s own Briefing Note to committee of 15 July 2026 — are the applicant’s and the council’s own paperwork, quoted directly. They belong in the top tier alongside the air quality finding: the cumulative-effects filter and the generator-count discrepancy set out below are not inferences about what happened, they are what the documents say. The same tier now also includes Ramboll’s Environmental Statement Review for Trident Way, commissioned by Ealing, which is the council’s own reviewer on the record. The one element still outstanding is Screening Opinion 251707SCE itself, whose reference and date are known but whose reasoning has not been obtained.
- **Contested external science.** The Cambridge/NTU heat-island preprint (Section 4) remains genuinely disputed by a published rebuttal. This briefing treats it as exactly that — unresolved, and the reason independent local monitoring is needed — not as proof of a specific temperature effect, and it should not be cited as settled fact by either side of this debate.
- **Peer-reviewed, but small and preliminary.** A separate, published (not preprint) study by an Arizona State University team (Section 4) directly measured a real, smaller data-centre warming effect — averaging under 1°C, detectable to 500m — using actual field measurements rather than satellite inference. This sits above the contested preprint in evidential weight, since it is peer-reviewed and its authors explicitly distanced themselves from the more dramatic disputed claim. It sits below the top tier because it covers four sites in Phoenix, not Southall, and its own authors describe it as a first, preliminary measurement. Useful as independent support that the underlying phenomenon is real and worth taking seriously — not as a source for any specific temperature figure for Southall.

The two schemes at a glance

	Trident Way Southall Industrial Estate UB2 5LF	Honey Monster site, Bridge Road UB2 4AE	Notes
Developer	Global Technical Realty (GTR), backed by KKR	CyrusOne	
Status	Approved 22 Oct 2025; Stage II Mayoral referral pending	Approved mid-July 2026 by Ealing’s planning committee	Both decisions now made; objection routes for both narrow to judicial review on a point of law
Site size	13 hectares (~32 acres)	6.82 hectares (~16.9 acres)	
Floorspace (GIA)	~157,700 sqm across data centres + industrial units	56,360 sqm (52,695 sqm data centre/office + 3,665 sqm affordable workspace)	
Height	Up to 37.4m	4 storeys (data halls); 4-storey affordable workspace	
IT load / power	256MW (GTR’s own published figure — see Section 2)	922,162.5 MWh/year confirmed (~105MW average draw)	
Cooling method	Closed-loop liquid cooling (officer-stated rationale: quieter than air conditioning)	Air-cooled chillers; no potable water consumed by cooling equipment	Different technologies — see Section 4

	Trident Way Southall Industrial Estate UB2 5LF	Honey Monster site, Bridge Road UB2 4AE	Notes
Heat reuse	~2MW captured for on-site industrial units; land safeguarded for future DHN connection	Waste heat reused on-site for office/workspace; land safeguarded for future district heat capacity	Both defer full heat network connection to an unbuilt future network
Jobs (operational)	1,030–1,120 (uplift of 410–530 on ~620 existing)	647 operational (£37m annual wage bill); 1,105 construction jobs	
S106 / investment	£20,248,500 total S106 contributions	£17,758,956 total (£9,854,706 S106 + £7,904,250 CIL)	
Backup generators	218 diesel generators	86 HVO (hydrotreated vegetable oil) generators	Different count and different fuel type
Combined heat output	256MW (claimed capacity)	~105MW (confirmed average draw)	~361MW combined continuous heat output; only ~2MW confirmed captured — see Section 6

1. The shared physics — why this matters for both sites

Whatever the cooling technology, the underlying thermodynamics are the same: virtually all the electricity a data centre draws is eventually converted to heat, and that heat has to go somewhere. At Trident Way, the confirmed figures make this concrete: the site's average continuous power draw is roughly 184MW (from its confirmed 1,610,528 MWh/year demand), against which only around 2MW is captured for reuse by the Section 106 agreement. That means **roughly 98–99% of the site's heat output** — depending on whether the confirmed average draw or GTR's own claimed 256MW capacity is used as the baseline — is rejected directly into the surrounding air rather than captured. Honey Monster's confirmed demand of 922,162.5 MWh/year (roughly 105MW average) reuses a similarly small slice on-site, with no MW figure disclosed for how much; the applicant's own energy hierarchy calculations credit the data centre itself with 0% of its carbon savings coming from heat network reuse, which points the same way. Both schemes plan to reuse a modest slice of their waste heat on-site and have safeguarded land for a future district heat network that does not yet exist and is not funded or scheduled. Until that network is built, the great majority of both facilities' heat output — whatever form the cooling technology takes — will continue to be vented, not captured.

This is not a hypothetical concern, though it is important to be precise about what has actually been measured. The strongest available evidence is a peer-reviewed study published in May 2026 by David Sailor and colleagues at Arizona State University, which took direct field measurements of air temperature around four operational data centres in Phoenix. It recorded downwind air temperatures averaging 0.7–0.9°C warmer than upwind, with a peak of 2.2°C, detectable up to 500m from the site perimeter. Those measurements were taken at air-cooled condenser discharge, which maps directly onto Honey Monster's air-cooled chiller system; Trident Way's closed-loop liquid cooling rejects heat by a different primary mechanism, so the finding should not be read across to that site without further information. The study covers four sites in Phoenix, not Southall, and its own authors describe it as preliminary — but it is measured, published and peer-reviewed, and it establishes that the underlying effect is real at a modest scale.

A separate preprint from Cambridge and NTU reports a far larger satellite-derived signal and has attracted correspondingly more attention. Its causal interpretation is genuinely disputed, and this briefing does not rely on it; Section 4 sets out both studies and the dispute in full. Neither study is needed to establish the gap this briefing asks to be closed. Neither Southall scheme models the effect of its own heat rejection on the surrounding neighbourhood at all,

and in Honey Monster’s case there is no Environmental Statement in which such modelling could have appeared, because the scheme was screened out of EIA altogether.

Neither application models the external effect of this heat rejection on the neighbourhood — both instead assess overheating using CIBSE TM52/TM54-style methodology, which measures thermal comfort inside occupied buildings, not the effect on ambient outdoor temperature nearby. That gap applies equally to both schemes and is the central ask of this briefing. This description is confirmed for Honey Monster from its ESS; for Trident Way, the reviewed Environmental Statement appendices (the Climate Baseline Report and Climate Change Resilience Assessment) instead use a qualitative sensitivity/vulnerability/magnitude framework, not a named CIBSE dynamic overheating simulation — so the TM52/TM54 attribution for Trident Way specifically should be verified against its own Energy Statement before being relied on.

Air quality and noise: what’s actually been found

This section comes ahead of the site-by-site detail because it holds the most directly evidenced finding in the briefing: Ealing’s own council record contradicting a developer’s claim outright.

Trident Way does not achieve Air Quality Neutral status — the council’s own finding

Trident Way’s own Air Quality Neutral Assessment (Fichtner, March 2025) already shows this isn’t a uniform pass at component level: the Data Centres portion sits well inside its 16 trips/m²/yr benchmark at 0.86, but the Industrial Units portion alone generates 12.02 trips/m²/yr against a stricter 6.5 trips/m²/yr benchmark — a shortfall the report itself states plainly, before blending both uses into a single development-wide figure that does pass.

There is a more direct point sitting in the same committee report, and it supersedes the applicant’s own AQNA arithmetic above: Ealing’s own appointed air quality consultant conducted an independent review of the whole application — not just the transport-only AQNA — and concluded, in the council’s internal consultee response, that the scheme “**would not achieve Air Quality Neutral status due to emissions from the operation and periodic maintenance testing of 218 diesel backup generators,**” and is therefore “not fully compliant with London Plan Policy S11, associated GLA guidance, and the Ealing Air Quality Action Plan.” This was mitigated by requiring the £3 million air quality S106 contribution and generator-control planning conditions, rather than by revising the design. This is the council’s own determination, not an outside inference or a disputed reading of the applicant’s figures: where this document set describes both schemes as “rated air quality neutral,” that is accurate only as a description of each applicant’s own claim. For Trident Way specifically, Ealing’s own record says the opposite.

Honey Monster’s own modelling shows predicted exceedances at three ecological sites

Honey Monster’s 86 **backup generators** are fuelled by HVO (hydrotreated vegetable oil) rather than diesel, each tested for 30–60 minutes per month, and were assessed for NO_x impact by the applicant’s own air quality consultant. That assessment (Ramboll, September 2025) models predicted **daily-mean NO_x exceeding the relevant Environmental Assessment Level at three nearby, locally-designated ecological sites during emergency generator operation** — Swift Road Sports Centre, Glade Lane Canalside Park, and Southall Park Nature Conservation Area, **reaching 109–134% of the threshold**. Ramboll judges this not significant, given the sites’ local (not national) designation and a conservative continuous-operation assumption — a judgment call residents may want to weigh for themselves rather than take on trust. This is both a smaller generator count and a different fuel type to Trident Way’s 218 diesel generators — a genuine point of contrast between the two schemes that’s worth confirming independently, including how HVO generator emissions compare to diesel ones in practice.

A correction on noise, from the same source

The same internal consultation record also corrects a claim used elsewhere about noise. Ealing’s noise pollution team reviewed Trident Way’s noise chapter and secured a planning condition covering “external noise from machinery, equipment, extract/ventilation ducting, mechanical installations” — the same condition category already confirmed for

Honey Monster, whose own BS4142 assessment (Ramboll, application 253874FUL) sets an explicit differential limit: normal plant noise capped 10dB below background, backup generators capped 10dB above. Neither scheme is without a published noise assessment or condition. What remains unconfirmed is the specific decibel figure in Trident Way's own decision notice, which should be requested directly rather than assumed not to exist.

The screening decision: how Honey Monster avoided an Environmental Statement

Section 6 of this briefing sets out that data centres are not on **Schedule 1 of the EIA Regulations**, so **Environmental Impact Assessment is discretionary rather than mandatory** for them. The **Honey Monster** site is a worked local example of how that **discretion operated**, and the underlying documents are now available.

On 29 April 2025, Montagu Evans, acting for CyrusOne, asked Ealing for a screening opinion under Regulation 6(1), enclosing an EIA Screening Report prepared by Ramboll and dated 28 April 2025. **Ealing adopted Screening Opinion 251707SCE, concluding that the proposal was not EIA development** and that no Environmental Statement was required. Earlier research for this project dates that opinion to 13 June 2025; that date should be verified against the opinion itself, which has been requested but not yet obtained. If it is correct, the **opinion came roughly 45 days after the request, against the 21-day statutory period** the applicant's own covering letter expressly invoked.

The cumulative filter that excluded Trident Way

Section 6 of Ramboll's screening report defines the schemes to be weighed for **cumulative effects** as those consented or approved, or holding a resolution to grant, or at an early stage of construction — meeting floorspace or unit thresholds, and within 1km or otherwise spatially linked to the site. A planning application still awaiting decision is excluded by that definition.

Table 6.1 of the report accordingly lists eight cumulative schemes: **Montreaux at Middlesex Business Centre, the Arches Business Centre, 13–19 The Green, two Havelock Estate phases, Southall Sidings, the Southall Gas Works and land off High Street**. Every one is residential or mixed-use. No data centre appears anywhere in the table.

This is the specific mechanism by which Trident Way was left out of Honey Monster's cumulative assessment. **It was not overlooked — it was filtered out by criteria that exclude undetermined applications by definition**. Whether Ealing adopted that table as submitted, or substituted a **cumulative analysis** of its own, can only be established from the text of **251707SCE**. Obtaining that document is now the single most useful outstanding step for anyone pursuing the cumulative case this briefing makes.

What the screening did and did not do with health

The screening report does address human health, in one row of its effects table. **Its baseline records that life expectancy in Norwood Green ward is below the England average** for both men and women, and that **mortality under 75 from all causes**, from circulatory disease and from causes considered preventable is notably **worse than the England average** — the same **vulnerability** picture Section 5 of this briefing draws from Ealing's own inequality reporting. That **baseline is stated, and is then not carried into the significance judgement**, which concludes in general terms that **good design and management would avoid significant health effects**.

Population and human health are express selection criteria under Schedule 3 of the EIA Regulations. The distance between the vulnerability recorded in the baseline and the **reasoning applied to it is a narrower and more concrete version of the argument this briefing makes** throughout — and, unlike the heat-island science, it depends on no contested external research at all.

The grid connection was removed from the assessment

The screening report states that the 132kV **connection from the new Elstree B substation** would be delivered under the New Roads and Street Works Act 1991, that this constitutes a separate consenting regime, and that it “has not been considered further within this report.” This corroborates from a primary document the private grid connection recorded in Section 3, which this briefing had previously been able to source only to CyrusOne’s own consultation materials. It also means **the largest single item of supporting infrastructure was severed from the environmental screening** on the basis that it is consented elsewhere — a point that would need specialist planning law advice before being pressed as a formal objection.

The screened scheme is not the scheme that was approved

Material differences exist between the development described to Ealing in April 2025 and the development permitted in July 2026. Data centre floorspace moves from approximately 50,300 sqm GEA to 55,142 sqm; the use class moves from B8 (storage and distribution) to Sui Generis; car parking from around 85 spaces to 78.

The **generator figure** deserves particular attention given the air quality findings set out above. The screening report describes 90 generators — 84 rated at 2,400kW and six at 800kW — and its ADMS dispersion modelling of NOx impacts was built on that count. The Briefing Note tabled at committee on 15 July 2026 records that the correct figure is 86, and that the Council’s advisor’s reference to 90 “was not the correct figure.” Ninety is, however, precisely the number in the applicant’s own screening submission. Either the scheme changed after screening, or the opinion was adopted on a project description the council now disowns. The correction runs in the direction of lower emissions, but it does not answer whether the screening rested on a superseded description — and a screening opinion attaches to the development as it was described to the authority.

How the screening position reached committee

The 118-page officer report published in advance of the 15 July 2026 committee meeting contains no EIA section in its contents, no reference to the screening opinion in its planning history, and no EIA entry among its listed planning considerations. The screening position was supplied instead in a Briefing Note tabled at the meeting itself, under “Notes / Additional Clarification(s),” introduced with the words “For completeness,” and prefaced with the statement that the clarification “does not alter the planning assessment or recommendation.”

Members and the public therefore had no advance sight of the EIA position in the committee papers, and the consultation period ran without it being identified in the report. The Briefing Note gives the basis of the opinion as “the characteristics of the development, its location and the nature of the likely environmental effects” — a recitation of the three Schedule 3 headings rather than a statement of reasons. It is a summary of the opinion, not the opinion.

The sequence below sets out where each decision is taken, by whom, and under which rule — and where the cumulative question was supposed to enter it. Schedules 1, 2 and 3 referred to throughout are all schedules to the same instrument, the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

The regulatory pathway: who decides what, and under which rule

From screening request to decision notice, for a Schedule 2 development in Ealing

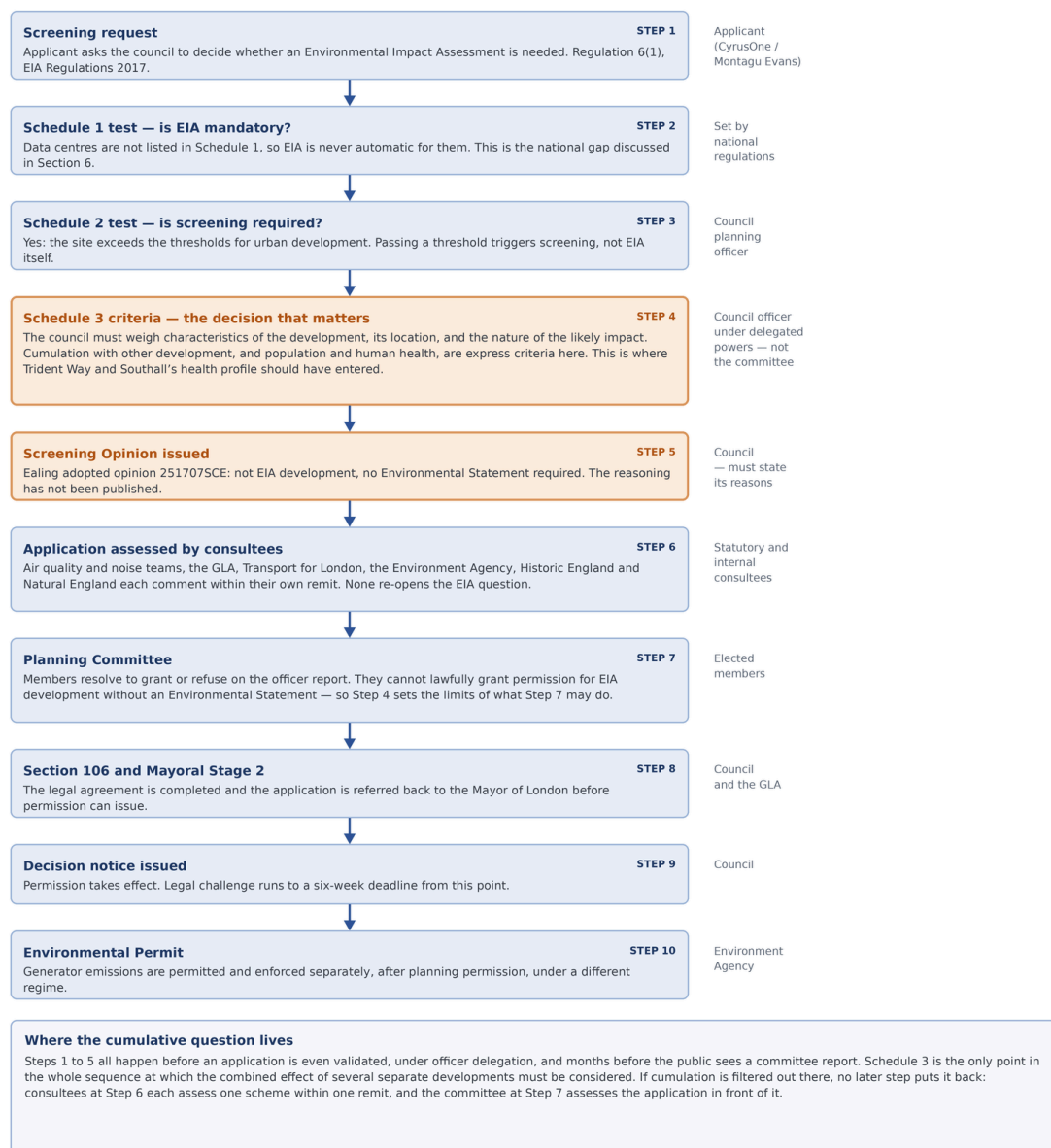


Figure 1: the consenting pathway for a Schedule 2 development in Ealing — the decision points, the responsible body at each, and where cumulative effects must be considered.

Water: what the council's own ES reviewer concluded

Ealing appointed Temple Group, now part of Ramboll, to review the Trident Way Environmental Statement against the IEMA Quality Mark criteria. Their Final Review Report 002, dated 2 September 2025, sits on the planning portal. It is the second instance in this briefing of the council's own appointed consultant contradicting an applicant's claim, and on water it goes further than the air quality finding does.

The reviewer concluded that water scarcity is a significant effect

At **IRR Ref 57** the reviewer rejected the applicant's rating outright, stating that the **sensitivity of the water scarcity receptor should be high rather than low**, and the magnitude minor, because the applicant had confirmed an increase in use against the baseline. Running those through the assessment matrix, the reviewer states the resulting effect is Moderate, **"which is significant and warrants further mitigation."**

Two things give that weight. The matrix is the applicant's own, at Table 12.4 of the Water Resources chapter, and the same chapter states at 12.3.23 that effects classified as moderate or major are Significant. The reviewer did not import an external standard; they applied the ES's own method and reached a different answer. And the chapter's overall conclusion, at 12.8.2, is that there would be no significant effects at all.

The review conclusion column records the outcome as "Acceptable. No further clarification requested, LBE to note the difference in the point of view." **A finding of a significant environmental effect was closed as a difference of opinion.**

The cumulative water question was closed by the method the reviewer had rejected

At IRR Ref 59 the **reviewer** disagreed with the applicant on cumulative effects on potable water supply, noted the ES's own acknowledgement that the area is water stressed, said they considered there to be a potential significant effect, and **required additional assessment against other commercial schemes on the cumulative list — "rather than simply passing this on to Affinity Water."** In the first review round the item was marked Unacceptable, with the required action being that additional assessment.

By the **final report it reads: "No further comments based on a review of Affinity consultation responses. Acceptable."** The **additional cumulative assessment was never carried out.** The issue was resolved by the water undertaker's confirmation — precisely the **substitution the reviewer had ruled out.** One detail worth establishing: the officer **report's external consultation table records Affinity Water as having made no comments on the application,** so which responses were reviewed, and whether they were direct correspondence with the applicant rather than statutory consultation, is a **fair question to put to the council.**

Off-site flood risk: the one item still open at final review

IRR Ref 54 was the only issue **outstanding when the review closed.** The Flood Risk Assessment's post-development modelling showed off-site pluvial flooding where the baseline model showed none, with the same pre-existing buildings in both scenarios — the **development appearing to increase flood risk beyond its own boundary.** The reviewer cited NPPF paragraph 181, which requires that flood risk is not increased elsewhere. **The applicant attributed the result to inherent modelling inaccuracy.** The reviewer did not accept that as resolving it, and said the position might be acceptable only with confirmation from the Lead Local Flood Authority and the Environment Agency, noting that no such evidence had been provided for flood risk.

The officer report records how it was closed. The Council's Flood Risk Officer accepted the applicant's clarifications, identified a **shortfall of 1,374m³ against the greenfield runoff rates required by London Plan Policy SI 13,** and **secured a £300,000 Section 106 contribution for off-site surface water attenuation within the wider catchment, alongside conditions requiring detailed flood modelling.** On that basis the report concludes the matter satisfactorily addressed.

That resolution sits awkwardly with the chapter it resolves. Chapter 12 assessed every water effect as negligible, stated that no additional mitigation or monitoring was required, and scoped surface water flood risk out of the cumulative assessment altogether on the reasoning that embedded mitigation means no off-site change can occur, therefore no cumulative effect can arise. A **£300,000 payment for off-site attenuation is not what a genuinely negligible off-site effect** looks like. It is also worth noting that **the Lead Local Flood Authority never responded to the applicant's pre-application consultation,** and that the assessment was expressly progressed, in the chapter's own words, with **no prior agreement to the assessment methodology.**

What this does and does not show

Water consumption is not the water story here, and it is worth being clear about that before anyone raises it publicly. Neither scheme uses evaporative cooling, the water-hungry design behind most headline figures on data centre water use. Honey Monster's statement records that no potable water is consumed by the cooling equipment itself; Trident Way is closed-loop, with its ES noting an initial high demand at commissioning followed by minimal ongoing draw. Anyone

briefed on the sector will know this, and an argument built on cooling water volumes would not survive contact with them.

The finding is about reasoning rather than volume: **a stressed resource, a confirmed increase over baseline, and a receptor sensitivity that the council's own reviewer put at high, resolved as a difference of opinion.** Two specific questions remain undisclosed and are worth putting to both operators. Whether either **heat rejection system uses adiabatic assist — spraying the coils to recover capacity in hot weather, which consumes water on precisely the hottest days, when supply is tightest.** And what volume each site requires at commissioning, which at a phased campus means a series of fill events across a multi-year build.

The pattern across all three findings is the same one this briefing identifies elsewhere. **A vulnerability is acknowledged in the baseline and then not carried into the significance judgement: on human health at Honey Monster, on cumulative development at screening, and on water here.**

2. Trident Way (250949FUL) — confirmed detail

Power and heat

GTR's own press material, issued around the time of approval, states the completed campus will offer a 256MW IT load. This figure does not appear anywhere in the 138-page planning committee report itself — the report only discloses an annual electricity demand of 1,610,528 MWh/year, which averages to roughly 184MW of continuous draw across the year. A 256MW nameplate capacity running at that average implies a load factor of around 72%, which is a plausible relationship for a data centre campus, but the 256MW figure itself should be attributed to GTR's own announcement, not to the council's report.

The Section 106 agreement secures roughly 2MW of waste heat for reuse by the neighbouring industrial units on-site, alongside a safeguarded 500sqm plot for a future district heat network energy centre and a 15-year peppercorn-rent option agreement for that land. Both the connection and the wider network remain **conditional on a network being built by a third party in future.**

Cooling and noise

In response to committee questions at the 22 October 2025 meeting, planning officers stated that the data centre would be cooled by a closed-loop liquid system, which they described as a better approach than air conditioning specifically because it would reduce noise to surrounding areas. It is worth being precise about what this claim does and doesn't cover: a closed loop avoids water loss through evaporation and can reduce fan noise, but it does not reduce the total heat that must ultimately be rejected to the outside air — the coolant still carries that heat to an external heat exchanger, which vents it outdoors, just as an air-cooled system would. **The officers' own framing was about noise, not about reducing atmospheric heat rejection, and it should not be read as addressing the heat-island question.** Trident Way's own Whole Life-Cycle Carbon Assessment reinforces this from a different angle: **refrigerant associated with the data centres' cooling systems (category B1) accounts for 41–42% of the entire development's whole-life embodied carbon** — the single largest contributor, ahead of the structural frame itself. That figure comes from the developer's own carbon assessment, not from this briefing's other sources, and it corroborates from another direction that **cooling load, not just IT load, is the dominant physical driver at this site.**

Jobs, money, and biodiversity

The Section 106 package totals £20,248,500. The single largest element is a £7,949,790 carbon offset payment. The remainder includes £6.6 million for a Data Centre Skills and Training Strategy, £3 million for air quality initiatives, £750,000 for a Local Economy Management Plan, £300,000 for off-site drainage, £41,647 for post-construction energy monitoring, and smaller sums for highways, heritage and trees.

On employment, the current estate supports approximately 620 FTE jobs. The development is projected to create 1,030 to 1,120 FTE jobs once operational — a net uplift of 410 to 530 — with construction running for approximately six years and generating around 460 FTE construction jobs per year. **These are projections, not commitments.** They are produced by applying standard national employment-density ratios to floorspace, they are supplied by the applicant, and **nothing in the permission requires a specific number of jobs to materialise or to go to local residents.** What is actually secured is the **£6.6 million Skills and Training Strategy**, which the **council imposed through the Section 106 agreement.** The same distinction applies to every benefit figure in this briefing: a **Section 106 obligation is an enforceable commitment to spend or provide, not evidence that an economic outcome has occurred.** Separately, 218 diesel backup generators are installed for emergency use only, each requiring an Environment Agency permit. Air quality and noise findings for this site are set out in the dedicated section above.

The scheme is reported to achieve a 79.4% Biodiversity Net Gain and an Urban Greening Factor of 0.17. This figure needs reading alongside its baseline: the committee report states plainly that "the existing site is of low ecological value with most of the areas covered by hardstanding and industrial structures." Biodiversity Net Gain is a relative measure — post-development habitat units minus baseline units, divided by the baseline — so a baseline close to zero mathematically inflates the percentage even from modest new planting. 79.4% comfortably clears the statutory 10% minimum, and **the underlying habitat-unit figures needed to judge how much of that is genuine new ecological value, rather than an artefact of a low starting point,** are not available in the documents reviewed for this briefing. This also plausibly explains why Honey Monster's reported BNG of 10.34% is so much lower: its site had sat vacant for years and had partially re-wilded before redevelopment, giving it a higher starting baseline than Trident Way's harder-surfaced industrial estate. The gap between the two figures may reflect how degraded each site was to begin with more than which scheme delivers better ecological outcomes — reinforcing that they should not be read as a like-for-like ranking.

3. Honey Monster site (253874FUL) — confirmed detail

This application was approved by Ealing Council's planning committee in mid-July 2026. The **objection route now narrows to judicial review on a point of law, the same as Trident Way.** This section draws on all four parts of CyrusOne's Energy and Sustainability Statement (prepared by Atelier Ten, September 2025) plus subsequent press coverage of the committee decision and report.

Scale and cooling

The site covers 6.82 hectares. The proposed development totals 56,360 sqm GIA: 52,695 sqm of data centre and ancillary office space, plus 3,665 sqm of affordable workspace with training centres and cafés. Cooling is via air-cooled chillers and air handling units, with free cooling maximised during suitable weather. The statement specifies that no potable water is consumed by the data centre cooling equipment itself, and the affordable workspace targets a 46% potable water demand reduction against the BREEAM baseline, with greywater harvesting.

Power

The site's confirmed annual electricity demand is 922,162.5 MWh per year, equivalent to an average continuous draw of roughly 105MW. For comparison, **Trident Way's confirmed annual demand of 1,610,528 MWh/year is roughly 75% higher than Honey Monster's.**

CyrusOne's own separate public consultation materials (not this ESS) have previously stated a private 132kV grid connection from a new substation at Elstree, due by 2029, deliberately avoiding the local grid. That claim now has a second, independent primary source: Ramboll's EIA Screening Report (April 2025) records a connection agreement via UK Power Networks to the National Grid Electricity Transmission network, for a 132kV connection from the new Elstree B substation delivered by Q2 2029. The same report then excludes that connection from its environmental assessment entirely, on the basis that it falls under a separate consenting regime — see the screening section above.

Backup power

The scheme proposes 86 backup generators fuelled by HVO (hydrotreated vegetable oil) rather than diesel, each tested for 30–60 minutes per month. Ramboll's modelling of NO_x at nearby ecological receptors, and the comparison with Trident Way's generators, are set out in the dedicated section above.

The figure of 86 is itself a late correction. The April 2025 screening report assessed the scheme on the basis of 90 generators, and it was that count which underpinned the dispersion modelling used to conclude that air quality effects would not be significant. The correction to 86 was recorded only in the Briefing Note tabled at committee on 15 July 2026 — see the screening section above.

Carbon, heat reuse, and the offset payment

The scheme targets a 54% carbon emissions reduction for the data centre and 42% for the affordable workspace against the Part L 2021 baseline, with a Power Usage Effectiveness (PUE) target of 1.22 annual / 1.48 peak. **Waste heat from the data halls is intended to heat the data centre's own office space and the affordable workspace via an on-site loop**; a fully-centralised site-wide heat network between the two buildings was considered and dropped due to added embodied carbon and cost. **No existing district heating network sits near the site — the nearest is a proposed 'Ealing' network, an extension of the same 'Ealing Town Centre Network' referenced in the Trident Way documentation, with construction not expected before 2030.** CyrusOne has offered to safeguard up to 651 sqm of land for five years from grant of permission for a future energy centre — a shorter safeguarding period than Trident Way's 15-year, 500 sqm commitment. The heat available from the data centre is described as low-grade, with a maximum export temperature of around 28°C, meaning a heat pump would be required to make it usable for any future network.

The confirmed contribution package agreed on approval totals £17,758,956, made up of £9,854,706 in Section 106 contributions (including over £2 million for transport, over £5 million for carbon offsetting, and over £1 million for air quality) plus £7,904,250 in Ealing Community Infrastructure Levy payments.

The statement targets "Excellent" ratings under both BREEAM Data Centres 2010 and BREEAM New Construction 2018.

Overheating and outdoor comfort

The overheating assessment here uses CIBSE TM52/TM49 methodology, testing office and workspace areas against design summer years including a high-emissions-adjusted DSY1 and more severe DSY2/DSY3 heatwave scenarios. This confirms the same pattern seen at Trident Way: **the methodology addresses thermal comfort for people inside occupied rooms, not the effect of the site's heat rejection on the surrounding neighbourhood.** A separate **microclimate and pedestrian comfort assessment** was also carried out, but this **evaluates wind conditions around the buildings, not ambient temperature or heat exposure** — it is not a substitute for external heat modelling.

On biodiversity and greening, the scheme is tracking an Urban Greening Factor of 0.31 (against a 0.3 policy target) and a Biodiversity Net Gain of 10.34% for habitat units, with a 0% change currently recorded for watercourse units and options for purchasing offsite units still being explored.

This figure needs a different reading to Trident Way's, and arguably a more critical one. The applicant's own ecological appraisal states that the site had partially "re-wilded" since the factory's demolition, giving it "a higher baseline biodiversity condition than the previously hardscaped industrial use" — the opposite starting point to Trident Way's low-value hardstanding. The same appraisal describes the existing site as a mix of crushed rubble, ruderal and ephemeral vegetation, tall forbs, introduced shrubs and species-poor grassland — not a high-value or irreplaceable habitat, but not ecologically empty either. Critically, the appraisal states that, with the exception of individual trees, the canal edge and one small area of scrub, it is assumed that all existing habitats on the site will be lost to the development. A higher starting baseline means the same percentage gain requires more new habitat to achieve, which is a reasonable explanation for why 10.34% looks modest next to Trident Way's 79.4% — but it sits alongside an explicit admission

that nearly everything currently growing on the site, however unremarkable, is being cleared and replaced. Neither the percentage nor the underlying habitat-unit figures needed to judge the trade precisely are available in the documents reviewed for this briefing.

This connects directly to the heat and carbon case made elsewhere in this briefing, not just to ecology in isolation. The ESS's own climate resilience summary names **"urban greening to mitigate urban heat island effect"** as one of the stated purposes of the landscaping. But the **vegetation being cleared to make way for that new landscaping — however unremarkable botanically — was itself providing some passive cooling through shade and evapotranspiration**, a function the document doesn't quantify either before or after redevelopment. More importantly, the scale mismatch is stark: **a few thousand square metres of new planting is being weighed**, in the ESS's own framing, against a site whose data centre alone represents a confirmed **~105MW of continuous heat rejection**. **Nothing in the document attempts to show that greening at this scale could meaningfully offset heat rejection at that scale** — the two are simply asserted alongside each other. And as Section 5 sets out, **none of this vegetation, old or new, has been assigned a carbon value either**: the carbon stored in the habitat being cleared isn't counted as a loss, and the new planting isn't counted as a gain, leaving both the **heat and carbon dimensions of the site's greening effectively unmeasured**.

4. The compounding case: warming, growth, and a live UK analog

None of what follows proves a specific outcome for Southall. What it does is stack **several independently well-evidenced trends that are all converging on the same few square kilometres over the same decade** — which is precisely the kind of cumulative picture that neither scheme was asked to model. That modelling gap is not unique to these two sites; it reflects a **live UK parliamentary debate** about **whether data centre regulation has kept pace with the sector's growth**, set out in full in Section 6.

A warming baseline — established

The Met Office's UK Climate Projections (UKCP18) show London's 1-in-50-year extreme summer day has already risen from 35°C in 1950 to 36°C in 2020. Separately, **Met Office research published in 2025 found the chance of the UK exceeding 40°C is now more than 20 times higher than in the 1960s**, with roughly a 50-50 chance of another 40°C day within the next 12 years, and a summer as hot as 2018 — a 1-in-10 event when it happened — expected to be close to a coin flip by mid-century. This is not contested science; it is **the backdrop against which any local heat source has to be judged**. It is also worth noting that **Trident Way's own Climate Baseline Report is not fully consistent within itself on the current baseline temperature it starts from**: the same 1991–2020 Heathrow baseline is given as 11.8°C in the report's narrative text and as 11.6°C in its own summary table, and the future-baseline calculations are then rebased again to a different, older 1981–2000 period (11.3°C) without reconciling the three figures. This does not change the overall direction of the projections, but it is a reminder that **the technical baseline underpinning the resilience conclusions has its own small inconsistencies before any heat-island question is even considered**.

London's own response: a "very high" risk, and still underfunded — established, June 2026

This is no longer only a projection. In **June 2026 the Mayor published Heat Ready London, London's first city-wide heat adaptation plan**, responding to the 2024 London Climate Resilience Review. It states that **the London Risk Register already rates extreme heat a "very high" risk, that London could see two to three times as many heatwaves within 20 years**, and that roughly 1 million homes and 1,361 schools, 60 hospitals and 351 care homes already sit in high heat-risk areas. The 2022 heatwave alone cost London an estimated £1.5 billion and coincided with more than **300 excess deaths** — a toll repeated in 2023 and 2025. The plan's own funding chapter states that heat adaptation "at present attracts only a small share of public and private finance," pricing home retrofit alone at £9–45 billion while noting that urban greening delivers an estimated 5.6:1 to 27:1 return on investment. Two national risk assessments published the same spring — the **Climate Change Committee's A Well-Adapted UK** and the **government's fourth statutory Climate Change Risk Assessment (CCRA4)** — **reach the same conclusion at**

national level. None of this is data-centre-specific, and none of it requires accepting the disputed Cambridge/NTU findings discussed below. It establishes, independently and from the Mayor's own office, that **Southall's heat vulnerability sits inside a citywide risk already judged severe, worsening and under-resourced — the baseline against which two new concentrated heat sources should have been, and were not, assessed.**

Southall's existing heat vulnerability — established

As set out earlier in this briefing, the **University of Manchester's Climate Just research already identifies Southall as containing several of Ealing's priority neighbourhoods for heat exposure** — areas combining **low tree canopy cover with lower average household incomes** — and the UCL mortality study already cited found **38% of London's 2022 heatwave deaths were attributable to the ordinary urban heat island effect**, before any data centre is factored in.

The data heat island effect — emerging, with an important caveat

The Cambridge/NTU preprint (arXiv 2603.20897), now reviewed in full, measured an average land surface temperature increase of 2.07°C around operational AI data centres worldwide, with a maximum of 9.1°C and a measurable effect extending to 4.5km. The important caveat: the study's methodology deliberately excluded data centres in dense urban areas, specifically to isolate a clean signal. That means 2.07°C was measured in relative isolation, not as an addition on top of an existing urban heat island — so it cannot be read as a proven additive figure for a dense London borough. There is, however, no evidence in the paper that the effect would be smaller in a built-up area. There is also a more fundamental critique of the preprint itself, set out in detail in a widely-circulated published rebuttal: that the measured LST increase may substantially reflect land-cover change — a large building and car park reading hotter to a satellite than the vegetation it replaces — rather than genuine atmospheric heat dispersal from operational waste heat, with a back-of-envelope physical estimate in that rebuttal suggesting waste heat could plausibly account for only a small fraction of the observed signal. Neither the original paper nor its critics have settled this definitively. That unresolved dispute is, if anything, the strongest argument for independent, purpose-built monitoring in Southall specifically, rather than treating either side's reading as conclusive.

A separate, **peer-reviewed study** published the same spring reaches a related but more modest conclusion, using a materially stronger method. David Sailor (director, School of Geographical Sciences and Urban Planning, Arizona State University) and colleagues published direct field measurements — not satellite inference — of **air temperature downwind of four operational data centres** in the Phoenix, Arizona area, in the ASME Journal of Engineering for Sustainable Buildings and Cities (May 2026). Using vehicle-based traverse measurements, **the study found downwind air temperatures averaging 0.7–0.9°C warmer than upwind areas, with a peak of 2.2°C, detectable up to 500m from the facility perimeter** — a real, measured, peer-reviewed effect, but smaller in both magnitude and range than the disputed Cambridge/NTU claim above, and explicitly described by its own authors as a preliminary, first-of-its-kind measurement rather than a settled ceiling. Sailor's own account is notable for a second reason: he had already seen the Cambridge/NTU preprint and, in his own words, held off sharing it because he found it methodologically questionable, publishing only once his own team had completed a more rigorous, directly-measured study. That is an independent, credentialed expert reaching the same cautious position this briefing already takes — real effect, not yet established at the scale sometimes claimed — which is corroboration of the caution above, not a reason to relax it. One further technical point worth being precise about: **Sailor's study measured air-cooled condenser discharge specifically, which maps directly onto Honey Monster's air-cooled chiller system.** Trident Way's closed-loop liquid cooling is a different primary mechanism, and this study should not be read as directly evidencing an equivalent effect there without further information about its final heat-rejection equipment.

Slough — a live, geographically close analog

Slough, roughly 10 miles from Southall, hosts Europe's largest data centre cluster — an estimated **30 to 40 facilities** with a **combined IT load in the region of 1 gigawatt**. During the UK's most recent heatwave, reporting by The Guardian (widely syndicated) recorded a nearby weather station reading of 36.7°C on one heatwave day, and quoted a local **café manager describing the heat near the cluster as feeling "like something pinching your body and**

burning your skin." Andrea Marinoni, the Cambridge preprint's lead author, told The Guardian that Slough represents a different scale of development from what his own study measured, calling it "almost like an experiment by itself." That cuts both ways: Slough cannot be used to prove the data heat island effect scales up in dense UK settings, but it is **the closest real-world comparison available, and it is already generating exactly the kind of resident-experience concerns this briefing is raising for Southall.** One further widely-circulated claim — that a **car park near the Slough cluster hit 45°C in 2022 versus 39°C in nearby Windsor** — could not be traced to an official reading or the original Guardian report and is not relied on here.

Southall's own population growth — established, from the council's own figures

Ealing Council's own planning data projects **Southall's population to grow faster than anywhere else in the borough: roughly 18–19% by 2031, 25% by 2036, and 32% by 2041.** This growth is not incidental to the data centre schemes — it's happening in the same footprint, **over the same decade.** The former Honey Monster site itself previously held lapsed permission for around 2,000 homes; the adjacent Middlesex Business Centre currently holds permission for approximately 2,000 dwellings; and the **wider Southall Opportunity Area targets 9,000 new homes and 3,000 new jobs.** This matters in two distinct ways that shouldn't be conflated: **new housing density independently raises the baseline urban heat island through additional hard surfacing and reduced vegetation** — a separate physical mechanism already recognised in the Manchester research above — and, regardless of that mechanism, a larger resident population simply means more people exposed to whatever combination of warming, urban heat, and data centre heat ultimately materialises. **Neither data centre application, and no document reviewed for this briefing, assesses these growth trajectories together.**

5. A social justice dimension

Ealing Council's own 2022 income inequality report, presented to its scrutiny panel, recorded **a median annual household income of £24,752 for Southall Broadway ward** — the lowest of any ward specifically cited in that report, against £49,728 in Southfield ward, the borough's highest. The same report named **Southall, alongside Northolt and Acton, as having some of the highest levels of relative income deprivation in the borough.** Independently, the **2025 national Indices of Deprivation identify Southall as one of a small number of deprivation clusters on the outer fringes of London,** in the same category as areas like New Addington and Erith.

This is not incidental to the case made elsewhere in this briefing. The **same population already carries above-average rates of cardiovascular and respiratory illness; the University of Manchester's "priority neighbourhood" heat-vulnerability classification,** cited in Section 4, specifically **combines heat exposure with lower household income as a compounding risk factor;** and Southall is absorbing the fastest population growth in the borough at the same time. **Two of the largest industrial developments the borough has ever approved — with their associated heat, noise, traffic and grid impacts — are landing on the part of Ealing with the lowest recorded household income, the highest documented heat vulnerability, and the fastest population growth, while a significant share of the economic return (business rates, city-wide digital infrastructure capacity) accrues beyond the immediate community.** That **distributional pattern is a legitimate planning consideration in its own right,** separate from the heat-science case made elsewhere in this briefing, and it strengthens the argument for the cumulative, externally-focused assessment this briefing asks for.

Carbon offsetting — the real-terms gap

Both schemes carry a carbon offset shortfall, calculated under the same GLA methodology at £95 per tonne of CO₂e over an assumed 30-year lifetime. Trident Way's is 83,682 tonnes, generating a £7,949,790 Section 106 payment. Honey Monster's applicant-estimated shortfall of 56,412 tonnes underpins roughly £5 million of its approved contribution package. **In both cases, this money is paid into Ealing's borough-wide carbon offset fund — it is not earmarked for Southall,** and nothing in either document commits it to being spent there.

Separately, **each site reports a set of physical greening measures**: Trident Way's 153 new trees, 79% Biodiversity Net Gain and 0.17 Urban Greening Factor; Honey Monster's 12,000m² of semi-natural vegetation, 840m² of open water habitat, 5,700m² of flower-rich perennial planting, green roofs and a 10.34% Biodiversity Net Gain. **These are delivered under separate biodiversity and urban greening policy, not the net-zero carbon policy that generates the offset payment — and neither document assigns the greening a carbon sequestration value.** There is, in other words, no calculation anywhere in either scheme's paperwork converting trees or planting into tonnes of CO₂ absorbed, and therefore no figure that nets local greening against either site's carbon shortfall. In real terms, "carbon offsetting" here means a **cash payment into a fund with no geographic guarantee, sitting alongside a landscaping obligation that was never costed in carbon terms** — not a package of local measures that can be shown to offset the sites' own emissions.

One further possible accounting gap — a claim that two of Trident Way's carbon documents give different figures for the same operational emissions — could not be verified against the application file despite two attempts. It is deliberately excluded from this briefing and should not be repeated until checked directly.

A rough order-of-magnitude estimate, since neither developer provided one: using commonly cited UK sequestration rates of 10–25kg CO₂ per tree per year and roughly 0.5–3 tonnes CO₂ per hectare per year for grassland/meadow-type planting, Trident Way's 153 trees would sequester in the region of 46–115 tonnes of CO₂ over 30 years, against a confirmed 30-year carbon shortfall of 83,682 tonnes — about 0.05–0.14% of it. Honey Monster's 1.77 hectares of semi-natural vegetation and perennial planting (excluding open water, and excluding trees, since no tree count is disclosed) would sequester roughly 27–159 tonnes of CO₂ over 30 years, against its applicant-estimated shortfall of 56,412 tonnes — about 0.05–0.28%. These are generic published rates applied to the disclosed areas, not site-specific figures from either ecological appraisal, and actual sequestration varies by two to three times depending on species, soil and management, so they should be read as illustrative of scale rather than a precise audit. Even taken at the generous end of every range, neither site's greening comes close to offsetting a meaningful share of its own carbon shortfall.

On whole-life carbon specifically: Trident Way's committee report gives upfront carbon [A1-A5] of 1,104 kgCO₂e/m² against a generic Office benchmark of 950 (there is no GLA benchmark for data centres), exceeding that benchmark across every measured category. Honey Monster's ESS gives a considerably higher upfront figure of 5,280 kgCO₂e/m² for its data centre. The two are not being placed side by side as a direct comparison here — the roughly five-fold gap likely reflects differences in assessment scope or floor-area basis that neither document explains, and this would need independent verification before being used as a claim that one site is worse than the other.

An open question on budget earmarking

Ealing Council has an approved General Fund savings target of £20.5 million across 2026/27–2029/30, with £11.9 million of that due in 2026/27 alone, alongside a separate, ring-fenced deficit in SEND funding. This is a real and documented financial constraint, though it should be stated accurately: the council itself has described 2026/27 as its first budget in 16 years without cuts to frontline services, funded partly through a council tax rise, so this is ongoing pressure rather than an acute crisis.

Against that backdrop, **Ealing's own Air Quality Action Plan (2022–2027) records between 147 and 165 premature deaths a year across the borough attributable to NO₂ and particulate pollution** — an existing health burden independent of either data centre. The two schemes together bring roughly £38 million in combined S106 and CIL contributions into the council's finances. **No published document reviewed for this briefing shows a ward-level or Southall-specific breakdown of council spending on climate adaptation, air quality or heat resilience, and no public commitment ring-fences any part of either contribution for Southall specifically or for the measures this briefing argues are needed.** That is not evidence the money won't reach Southall — it is an open transparency question, and a reasonable one to put directly to the council: what proportion of these contributions will be spent in Southall, on what, and how will residents be able to track it?

There is also a more specific, and more recent, answer to part of that question. In October 2025 the GLA issued a Carbon Offset Funds Guidance Practice Note clarifying that boroughs may use offset fund money for "adaptation measures" and "urban greening and green infrastructure," provided these sit alongside genuine carbon-mitigation

projects rather than replacing them — a direct response to London Assembly pressure the year before for the GLA to set clearer criteria for the funds. This closes off one likely objection: **offset funds are not restricted to pure carbon mitigation, and heat adaptation spending in Southall would not need new GLA policy to be lawful.** It is worth being precise about what this guidance does and doesn't establish, though. It confirms thematic eligibility — the fund can pay for adaptation and greening as well as mitigation. It says nothing about geographic ring-fencing — spending the money raised from a Southall development back in Southall specifically. That remains entirely a **discretionary choice for Ealing**, not something GLA guidance requires or prohibits; as the GLA itself puts it, "LPAs are responsible for how they spend their carbon offset funds." The accurate ask, then, is not that the council is currently breaking a rule, but that it holds a discretion it has not committed to using: **nothing prevents Ealing directing part of the roughly £13.3 million combined carbon offset payment toward heat adaptation and greening in Southall specifically, as part of a blended package alongside genuine mitigation measures**, and the only thing standing in the way is a decision the council has not yet been asked to make in public.

6. Why the sites should be assessed together, not separately

Ealing Council has, to date, assessed Trident Way and the Honey Monster site as two independent applications, each judged against its own site boundary. The mechanism by which that happened at Honey Monster is now documented: **the cumulative-effects filter applied at screening excluded any scheme still awaiting decision, and Trident Way with it, and the resulting Screening Opinion 251707SCE removed the requirement for an Environmental Statement altogether.** Trident Way produced an Environmental Statement with a cumulative-effects assessment; Honey Monster produced none. **Neither exercise models what it means for two hyperscale data centre campuses of this scale to operate simultaneously less than two kilometres apart**, on top of an area already flagged by independent researchers as a priority neighbourhood for heat vulnerability, and already absorbing some of the fastest population growth in the borough.

Trident Way and Honey Monster are also not the only schemes in the pipeline. Within Ealing borough itself, the former Frogmore Industrial Estate on Acton Lane, Park Royal — also decided by the Old Oak and Park Royal Development Corporation (OPDC) rather than Ealing's own committee, since it sits in the OPDC's planning area — had an earlier 35,000 sqm data centre scheme from ReAssure refused in mid-2026. The site was then bought by Kao Data in March 2026, who are now preparing a fresh application, targeting operation by 2029. Just outside the borough boundary in neighbouring Brent, but part of the same Park Royal cluster, SEGRO and Pure Data Centres received OPDC committee approval in March 2026 for a 56–72MW, roughly £1 billion facility at Premier Park Road — its own committee papers describe closed-loop liquid cooling, in the same terms used at Trident Way, again framed around water use and noise rather than external heat impact. None of these schemes has been assessed together with Trident Way or Honey Monster, despite sitting within a few kilometres of each other and, in some cases, within the same planning authority's remit.

The two Southall sites alone give a combined megawatt figure: Trident Way's claimed 256MW capacity plus Honey Monster's confirmed average draw of roughly 105MW comes to approximately 361MW. It is worth being precise about what is being added together here: 256MW is GTR's own claimed nameplate capacity, not a confirmed average draw, while 105MW is Honey Monster's confirmed average draw calculated from its disclosed annual MWh figure. Combining a claimed capacity with a confirmed average draw is not a strictly like-for-like sum. Using confirmed average draws consistently for both sites — Trident Way's own confirmed 184MW average (Section 1) plus Honey Monster's 105MW — gives an alternative combined figure of roughly 289MW. Both framings point to the same underlying scale of continuous heat rejection, but the gap between them (289MW to 361MW depending on which Trident Way figure is used) should be stated plainly rather than collapsed into a single number. **Under the same thermodynamics used throughout this briefing, virtually all of that power is eventually converted to heat, so the combined continuous heat output of both sites, once fully operational, is of the same order — roughly 361MW.** Against that, the only confirmed capture figure across either site is Trident Way's approximately **2MW routed to its on-site industrial units; Honey Monster's on-site heat reuse** has no disclosed MW figure but is described as minimal. Using only the confirmed 2MW, that leaves **roughly 359MW — around 99% of the combined total — rejected**

directly into the surrounding air. Even without a confirmed combined megawatt figure across the wider pipeline as well, the scale of what's being proposed within a small radius of Southall and Park Royal is unusual by any measure: over 210,000 sqm of combined floorspace at the two Southall sites alone, over 300 backup generators between them (218 diesel at Trident Way, 86 HVO-fuelled at Honey Monster), a further 56–72MW confirmed at Premier Park Road, and at least one more scheme (Frogmore) actively being re-designed for resubmission. Trident Way and Honey Monster's documentation both independently point to the same **future 'Ealing Town Centre' district heat network** as their intended eventual offtake route — meaning **both sites are, in effect, competing for or sharing capacity in a single piece of infrastructure that doesn't exist yet and isn't funded.** A cumulative assessment covering the full pipeline, rather than a series of isolated sign-offs by different committees, is a reasonable and specific thing to ask for.

To be clear about what is and isn't being claimed here: the ≈ 361 MW figure (or ≈ 289 MW on the alternative, consistent-basis reading above) is a straightforward sum of the two sites' own headline power figures — one a claimed nameplate capacity, one a confirmed average draw — not a modelled outcome. No research reviewed for this briefing has studied what happens when multiple hyperscale data centres operate in close proximity to each other and to a dense residential population, and heat effects measured at individual sites elsewhere in the world do not necessarily scale in a simple, additive way. This briefing does not know, and does not claim to know, what the combined thermal effect of Southall's two approved sites — or the wider Park Royal pipeline — would be on local temperature. That absence of evidence is precisely the point: the gap exists because nobody has been asked to study it, not because it has been studied and found to be negligible.

The district heat network: real potential, minimal investment

Both sites defer the great majority of their waste heat to a future district heat network as the eventual solution — but it is worth separating how real that solution actually is from how real the underlying potential is.

The potential is genuine and independently assessed: a GLA/OPDC heat recovery pre-feasibility study for the wider Park Royal area concluded that **waste heat from data centres there has the potential to meet and exceed the future heat demand of nearby developments**, including a specific proposal to supply an NHS facility less than 500m from the Frogmore site. This is not the developers' own marketing — it is an independent planning study confirming the **physics-and-demand case.**

The committed investment, by contrast, is minimal. **Trident Way secures 500sqm of safeguarded land on a 15-year option at a peppercorn rent of £1 a year; Honey Monster offers 651sqm for five years only. Neither S106 package contains a specific capital sum for actually constructing a network** — compare that to the itemised £6.6 million for skills training or £3 million for air quality at Trident Way. Honey Monster's ESS goes further and explicitly assigns construction cost to the council: **any future energy centre "would be the responsibility of the council, including for the cost of construction maintenance."** The same document states plainly that "there is not currently the infrastructure (or a developed proposal for infrastructure) to make beneficial use of this heat," and that the nearest network, an extension of Ealing Town Centre's, is "proposed for construction post-2030" with no funding secured. **The heat itself is also low-grade** — Honey Monster's maximum export temperature is around 28°C — meaning any **future network would need additional heat pump infrastructure just to make the waste heat usable.**

In short: what has been secured is a land option and a safeguarding obligation, not a funded network. That gap between a well-evidenced potential and an unfunded plan is directly relevant to the budget-earmarking question raised in Section 5 — a council already managing a multi-year savings programme has, on the documents reviewed here, no disclosed funding line to actually build the network both developers are counting on.

There is a further, independent reason to doubt the network arrives in time to change this picture, beyond what either developer's own documents disclose. Ealing's own Heat Network Feasibility Study for the town centre area (2025, funded jointly by the council and the GLA's Local Energy Accelerator) identifies the **two Southall data centres only as a heat source "outside of the assessment area" for a possible future phase** — its recommended source for an initial network is centralised air source heat pumps, not data centre waste heat at all. As of the LGA's own evidence to the current parliamentary inquiry (6 July 2026), **Ealing is still only "considering next steps" and exploring "whether**

the project can be progressed and delivered in the coming years" — there is no committed delivery vehicle, funding settlement or construction date, over a year after that feasibility work was published. **Honey Monster's own five-year land safeguarding option is shorter than the "post-2030" horizon its own ESS gives for the nearest possible network extension, which raises a live risk that the site's safeguarded land reverts before a network exists to connect to.** And even in a successful future scenario, connection would not stop the venting: a GLA-commissioned study of data centre heat reuse across London (AECOM/HermeticaBlack, 2025) found the commercial model considered most workable is a data centre supplying heat "when available," with no obligation on quantity or timing, because operators require the ability to reject their full heat load to atmosphere at all times regardless of any network connection. The same study found that **data centres currently being developed around London are, on average, recovering only around a quarter of their theoretical waste heat, because reuse was not prioritised at the design stage — the same pattern evident at both Southall sites,** where Trident Way's confirmed capture (2MW against a roughly 184MW average draw) is barely 1%, and Honey Monster discloses no reuse figure at all. Put together, this is not a case of the right solution being a few years away: **both facilities will be operating at scale, for years, before any network is even committed, let alone built and connected.** The waste heat has to go somewhere in the meantime, and on the evidence reviewed here, "somewhere" means the air above Southall for the foreseeable operational life of both sites, not a brief gap before the network arrives.

This is a national gap, not just a Southall one

Neither Southall scheme being unassessed for external heat impact is not an isolated oversight — it reflects a genuine gap in UK regulation that is currently the subject of live parliamentary scrutiny. **Data centres are not included on Schedule 1 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, the list of development types for which full Environmental Impact Assessment is mandatory regardless of scale. For data centres, EIA remains discretionary. The Honey Monster site is a live local demonstration of what that discretion produces:** a 6.82-hectare hyperscale facility drawing roughly 105MW continuously, adjacent to housing and inside a borough-wide Air Quality Management Area, permitted without any Environmental Statement, on a **screening opinion whose reasoning has still not been published.** Written evidence submitted to a **UK parliamentary committee in May 2026 states plainly that this "should change," and separately identifies "the lack of a proactive, strategic framework to manage the cumulative environmental effects of data centre development" as a specific, named national concern** — the same gap this briefing has identified between Trident Way and Honey Monster.

It's also worth being precise about where the current reform conversation is focused, because it isn't yet where this briefing is asking it to go. **Campaigns pushing to add data centres to Schedule 1 — including from Friends of the Earth — justify this on the basis of likely significant effects on water, climate and air quality. Ambient heat is not a named criterion in that push.** Separately, there is **no UK requirement for data centre operators to disclose Power Usage Effectiveness, water usage effectiveness, or heat recovery rates at all** — a gap policy commentators have called on DESNZ or the Environment Agency to close, which as of the sources reviewed for this briefing has not happened. The request in this briefing — external heat modelling as a condition of approval — is therefore ahead of, not behind, where national regulatory reform currently sits, which is exactly why raising it locally, rather than waiting for national policy to catch up, matters.

The clearest and most current confirmation of this gap comes from local government's own national voice. In its 6 July 2026 written evidence to the same parliamentary inquiry, the **Local Government Association stated that data centre environmental impacts "are not being adequately accounted for in current national planning, regulatory or environmental oversight frameworks," that impacts are too often "addressed late in the process rather than through strategic, plan-led consideration," and called for siting decisions to weigh "cumulative environmental effects at a regional scale"** — the same argument this briefing makes about Trident Way and Honey Monster, made independently to Parliament by the body representing every council in England. The LGA also illustrates, with live current examples, how unevenly this gap is being handled: central government overriding a local authority's refusal of a data centre scheme in Buckinghamshire, against Edinburgh Council's own vote for a moratorium on new data centre development pending clearer environmental guidance. Separately, the LGA's submission independently corroborates a fact already established above: it confirms Ealing's own Heat Network Feasibility Study found Ealing Town Centre a

viable network site "with existing supporting infrastructure and planned data centre development" — the same offtake route both Trident Way and Honey Monster are counting on, described in near-identical terms by the borough to its own residents and by the LGA to Parliament.

7. Conclusion

Southall now hosts two approved hyperscale data centre schemes, Trident Way and the former Honey Monster site, cleared by the same Ealing planning committee within nine months of each other, with further schemes approved or being prepared in the adjoining Park Royal cluster. Each scheme carries **projected benefits** — employment estimates, business rates, brownfield regeneration — and neither is opposed here in principle. Those benefits should be read for what they are: **applicant projections built on standard national ratios, alongside Section 106 obligations the council imposed as the price of consent**. They are commitments to be monitored, not results already banked.

What the schemes share is not a single defect but a common boundary. Each was assessed against its own red line. **Trident Way produced an Environmental Statement with a cumulative-effects assessment; Honey Monster produced no Environmental Statement at all, because Ealing screened it out of Environmental Impact Assessment in June 2025 on reasoning it has not published — and the screening report it relied on applied a cumulative filter that excluded any scheme still awaiting decision, Trident Way among them. Schedule 3 of the EIA Regulations makes cumulation with other development, and effects on population and human health, express criteria for exactly that judgement.** It is the one point in the entire regulatory sequence at which the combined picture must be considered, and on the evidence available it was not.

What went unassessed as a whole, rather than site by site, is now a long list. The combined continuous heat rejection of the two Southall sites — somewhere between roughly 289MW and 361MW depending on which power figure is used — of which only around 2MW is confirmed captured. The output of more than 300 backup generators between them, 218 of those diesel, in a borough-wide Air Quality Management Area where the council's own action plan attributes between 147 and 165 premature deaths a year to air pollution. A water scarcity effect that the council's own ES reviewer judged significant and requiring further mitigation, recorded instead as a difference of opinion. Two carbon shortfalls paid into a fund with no geographic guarantee. Two sets of greening obligations never costed in carbon terms. Two claims on a single district heat network that does not exist, is not funded, and which Ealing's own feasibility study does not currently propose to source from these sites at all. And a wider Park Royal pipeline assessed, where assessed at all, by a different planning authority.

That gap lands on a specific place: a part of Southall with the lowest recorded household income of any ward in the council's own reporting, already flagged as heat-vulnerable by independent researchers, and absorbing the fastest population growth in the borough. It comes with a carbon offsetting regime that pays into a fund with no guarantee any of it reaches Southall, sitting alongside biodiversity and greening obligations that were never costed in carbon terms. And it lands at a moment when the council itself is managing a multi-year savings programme, with no public commitment about how the roughly £38 million these two schemes bring in will be spent, or where.

None of this proves a specific bad outcome, and this briefing does not claim to know what the combined effect will be. That is the point. **The absence of evidence exists because nobody was required to look, not because anyone looked and found the risk negligible** — and it falls on the part of the borough with the lowest recorded household income in the council's own reporting, already identified as heat-vulnerable by independent researchers, and absorbing the fastest population growth in Ealing. Closing that gap for what has already been approved, and requiring a genuine cumulative assessment before the next scheme is decided, is what this briefing asks for.

8. What we are asking for

The asks below fall into two different kinds, and it's worth keeping them distinct. Some cost little and mainly require transparency, verification or an assessment being done properly — a council or developer could reasonably agree to

these quickly. Others require an actual capital or funding commitment, and are bigger asks that take longer to secure. Conflating the two risks making the whole list sound either more expensive, or more easily deferred, than it actually is.

A. Monitoring, verification and transparency

- Require, as a condition of ongoing S106 monitoring on both sites, independent and published post-occupancy monitoring of ambient outdoor temperature in Southall, not just internal energy performance.
- Ensure Trident Way's Stage II Mayoral review considers cumulative heat and grid impact on Southall specifically, alongside Honey Monster, rather than assessing each site in isolation.
- Request independent verification of CyrusOne's private grid-connection and water-use claims, and reconciliation of the ESS's internal energy-figure inconsistency, now that the scheme has been approved.
- Require future carbon offset statements for any further Southall applications to quantify the carbon sequestration value of proposed on-site greening and biodiversity measures, so residents can see whether local planting materially offsets any part of a site's carbon shortfall, rather than treating landscaping and carbon accounting as unconnected obligations.
- Ask Ealing Council to publish how much of the combined S106 and CIL contributions from Trident Way and Honey Monster (approximately £38 million) will be spent in Southall specifically, on what, and on what timeline — with a public tracking mechanism residents can follow.
- Obtain and publish EIA Screening Opinion 251707SCE for the Honey Monster site, with its date of adoption, its stated reasons, the officer and delegated authority under which it was made, the internal consultee responses that fed into it, and any written agreement extending the 21-day statutory determination period. Adopted screening opinions must be available for public inspection alongside the planning register, so residents should not have to wait out an information request to see it.
- Ask Ealing whether re-screening was considered when application 253874FUL was validated on 3 October 2025, given the differences in floorspace, use class and generator count between the scheme screened in April 2025 and the scheme determined in July 2026.
- Press for any future data centre screening opinion in the borough to treat undetermined applications already known to the authority as cumulative development, rather than applying a filter that excludes them by definition — and for the screening position on any major application to appear in the published officer report, not in a note tabled on the day of the decision.
- Ask Ealing what weight was given to IRR Ref 57 in determining 250949FUL, given that the council's own appointed ES reviewer concluded a significant water scarcity effect arises and warrants further mitigation, and the Environmental Statement concluded there were no significant effects at all.
- Request the Affinity Water consultation responses relied on to close IRR Ref 59, and confirmation of whether the additional cumulative water assessment against other commercial schemes was ever undertaken.
- Ask both operators to confirm whether their heat rejection equipment uses adiabatic or spray assist in hot weather, and to disclose the commissioning water volume for each phase — neither figure appears in any submitted document reviewed for this briefing.
- Commission a cumulative thermal, grid and water assessment covering Trident Way, Honey Monster, Premier Park Road, and any resubmitted Frogmore scheme — spanning both Ealing Council's and OPDC's planning authority, since the cluster crosses that boundary, with Southall's cumulative exposure as its central question.
- Where any further scheme in the pipeline — including a resubmitted Frogmore application — remains undecided, require the same external heat modelling and clear power disclosure this briefing asks for at Southall, so the standard doesn't lower once residents' attention moves elsewhere.
- Ask Ealing Council and Southall's MP to cite Trident Way and Honey Monster as concrete local evidence in the live parliamentary scrutiny of data centre environmental regulation, and to specifically press for ambient heat impact to be added as a named criterion alongside water, carbon and air quality in any reform of the EIA regulations.

How the ambient heat monitoring above could actually work

This isn't a call for something exotic — it uses tools and consultants already involved with both sites. It could proceed in three stages:

- **Baseline:** a network of ground-based temperature and humidity sensors at varying distances and directions from each site, plus an unaffected control location, run for at least a full year to capture seasonal variation before treating any later reading as a change.
- **Modelling:** extend Honey Monster's confirmed CFD microclimate study — commissioned for pedestrian wind comfort and already using DSY1/DSY2/DSY3 heatwave scenarios under TM52/TM49 for internal overheating — to model thermal plume dispersion from its cooling exhaust. Trident Way's committee report and S106 documentation should be checked for an equivalent microclimate study; if none exists, one should be commissioned to the same standard. Either way, a wider-scale run covering both Southall sites and the Park Royal cluster together is needed to address cumulative impact rather than one site at a time.
- **Post-occupancy verification:** continue the sensor network once each site is operational, supplemented by periodic satellite land-surface-temperature comparison using the same remote-sensing method as the Cambridge/NTU study, with results reported at defined intervals — ideally alongside Trident Way's confirmed post-construction energy monitoring commitment (£41,647 secured via S106). Any equivalent five-year 'Be Seen' monitoring obligation at Trident Way should be verified against the site's own S106 documentation rather than assumed to already exist.

The Cambridge/NTU research team has already built the methodology to do exactly this kind of before-and-after study, and has flagged the need for further site-specific research of this type. Southall is, in effect, about to become a live natural experiment regardless of whether anyone studies it — approaching that team, or a comparable academic group, to conduct a genuine before/after assessment at Trident Way specifically would cost residents nothing and would produce the first real evidence either way.

B. Infrastructure and investment

- Set binding timelines for delivery of the district heat network and each site's heat offtake commitments, rather than leaving them open-ended — and given the evidence in Section 6 that no such timeline currently exists, require each operator to publish an interim heat-management plan covering the years before any network could realistically connect, with the waste heat treated as unmitigated for planning purposes until a delivery date is actually secured.
- Confirm whether any part of the roughly £13.3 million combined carbon offset contribution will be directed toward heat adaptation and greening in Southall — which GLA guidance (October 2025) already permits as part of a blended mitigation-and-adaptation package — rather than treating this as requiring new policy the council doesn't yet have.
- Direct any future data centre S106 or carbon offset contributions in Southall toward the high-return adaptation measures Heat Ready London itself prioritises — greening and shading interventions the Mayor's own plan values at 5.6:1 to 27:1 benefit-cost ratios — rather than undifferentiated “sustainability initiatives” line items.

C. Air quality and noise

These asks are lighter than the heat and infrastructure asks above — mostly monitoring, and direct contact with officers already involved. That reflects what is achievable quickly, not the strength of the evidence behind them: the air quality finding above is the council's own record, and among the most directly evidenced claims in this briefing.

- **Monitoring:** Ask Ealing's Pollution Technical (Air Quality) team directly what monitoring or enforcement follows from their own finding that Trident Way does not achieve Air Quality Neutral status — specifically, whether the annual air quality emissions monitoring required under the Environmental Permit will be published, and to whom.
- Request Trident Way's exact noise condition wording from its decision notice, and press for independent, published post-occupancy noise monitoring at both sites once operational — not just the modelled predictions in each scheme's submitted assessments.
- **Minimising impact on residents:** Press both operators to publish generator testing schedules in advance, consistent with the Environment Agency's own guidance that testing should avoid periods of poor air quality and

that generators should not be tested simultaneously — and ask whether Trident Way's non-compliance finding should mean tighter testing limits than standard, rather than only a cash contribution.

- Ask both councils' environmental health teams what the practical complaint and escalation route is for residents once either site is operational, and press for it to be publicised locally in advance, not left for residents to discover after problems start.
- **Who to contact:** The officers who reached the findings above — Ealing's Pollution Technical (Air Quality) and (Noise) teams — and the Environment Agency, which issues and enforces the Environmental Permits governing generator emissions at both sites.
- The GLA, since SI1 compliance is a London Plan matter and Trident Way's Stage II Mayoral referral is still pending — this finding is directly relevant to that review, not just a local council record.

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Figures in fast-moving planning processes change; readers relying on any specific number for a formal submission or press use should verify it against the primary source first, and check the Frogmore site's status directly with OPDC given a resubmission may be filed at any time.