SECOND REQUEST FOR SCREENING OPINION UNDER THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND) REGULATIONS 2017

PROPOSED CONSTRUCTION OF A DATA CENTRE CAMPUS

LAND WEST OF HERMISTON HOUSE ROAD, CURRIE, EH14 4AG

GRID REFERENCE: X 316900, Y 670000

FOR:

APATURA DC PROJECT 11 LTD

REF: P00108

December 2025

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COMPANY PROFILE

AAH Consultants have provided consultancy advice to a broad range of public and private sector clients since its incorporation in 2006. We are a multi-discipline team with chartered members of the Royal Town Planning Institute (MRTPI), Institute of Civil Engineers (CEng MICE) and Landscape Institute (CMLI).

We have a proven track record of negotiating and designing large- and small-scale development on greenfield and brownfield land both within and outside of development limits. Success is achieved through land promotion, speculative planning application, appeal and Public Inquiry, including where the Local Planning Authority claim a sufficient supply of allocated sites.

Our approach is fair and balanced, seeking collaboration with Local Planning Authorities to achieve a common goal, but we are also client focussed, proactive, and acutely aware of the need to challenge unsatisfactory planning outcomes when this is necessary. We work with professionals and private landowners, offering our service as a fee-based client-consultant relationship or, in some instances working, in partnership.

Technical services include a spectrum of Planning and Landscape Supporting Documents, Flood Risk Assessment (FRA) and Drainage Design, including Sustainable Drainage Systems (SuDS). Planning service packages support projects from their concept through to determination and approval of detail.

1.0 INTRODUCTION

1.1 This document has been prepared by AAH Consultants, on behalf of our client Apatura DC Project 11 Ltd, to support an EIA screening request to City of Edinburgh Council under Regulation 8 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 for the construction of a Data Centre Campus on Land West of Hermiston House Road, Currie, EH14 4AG.

1.2 Scotland's Central Belt is one of the UK's most competitive locations for AI investment, combining low-carbon energy, cost efficiency, and strong digital connectivity. With direct access to 35+ GW of wind, hydro, and solar capacity by 2030, the region offers a reliable, low-cost power supply. Additionally, Scotland's cooler climate, on average 3°C lower than England, reduces cooling costs, improving energy efficiency and sustainability for data centre operations. The region also benefits from 12+ fibre providers and five international cable landing stations, ensuring high-speed, resilient connectivity for global AI and digital infrastructure.

1.3 Apatura are leaders in energy infrastructure development, providing the critical foundations for large-scale data centre investment in Scotland. With a 10.6GW portfolio of grid-secured energy projects, including 1.8GW of high-confidence, strategically selected data centre grid connections, in close proximity to carefully selected landholdings, Apatura is uniquely positioned to support the expansion of hyperscale digital infrastructure. By leveraging their extensive experience, strategic partnerships, and deep market knowledge, Apatura are well positioned to support Scotland's ambition to become a premier destination for data centre investment.

1.4 Following a request for a screening opinion made under Regulation 8(1), the Planning Authority receiving the request must, unless a screening direction is made by the Scottish Ministers, adopt a Screening Opinion on or before the expiry of the period 21 days beginning with the date of receipt of the request.

1.5 The Proposed Development site was previously screened with City of Edinburgh Council, who originally determined that the proposed development was non-EIA development. City of Edinburgh Council has since requested that the site is 're-screened' with further information relating to climate change and sustainability. Please refer to paragraphs 4.44 and 5.21 as well as the additional supporting reports which specifically address these points.

1.6 Since the previous EIA Screening Request was submitted to City of Edinburgh Council, the design process has evolved and the new layout provides indicative detail from which to base the screening process, based on likely maximum built form parameters. This EIA screening request is based on the updated layout proposal, notwithstanding this, the layout may be subject to amendments as the design progresses.

1.7 The subject proposals fall within Schedule 2 Category 10(a) 'Industrial Estate Development Projects' (as the area of the development exceeds 0.5 hectares) of the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017. However, development of a type listed in Schedule 2 only requires an EIA where the development is likely to have significant effects on the environment by virtue of facts such as its nature, size or location.

1.8 As per the EIA Regulations, a request for a Screening Opinion under paragraph (1) must be accompanied by:

(a) A description of the location of the development, including a plan sufficient to identify the land (see Appendix A);

(b) A description of the proposed development including;

  (i) A description of the physical characteristics of the development and, where relevant, of demolition works;

  (ii) A description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;

(c) A description of the aspects of the environment likely to be significantly affected by the development;

(d) A description of any likely significant effects, to the extent of the information available on such effects, of the proposed development on the environment resulting from –

  (i) The expected residues and emissions and the production of waste, where relevant; and

  (ii) The use of natural resources, in particular soil, land, water and biodiversity.

1.7 Schedule 3 of the EIA Regulations sets out the selection criteria which must be applied when determining whether a Schedule 2 development is likely to have "significant effects" on the environment. The three tests of the selection criteria are as follows:

- **Consideration of the characteristics of the development -**
  - The size and design of the development;

- Cumulation within other existing development and/or approved development;
- The use of natural resources, in particular land, soil, water and biodiversity;
- The production of waste;
- Pollution and nuisances;
- The risk of major accidents and/or disasters which are relevant to the project concerned, including those caused by climate change, in accordance with scientific knowledge;
- The risk to human health.

- **Consideration of the location of development and environmental sensitivity of geographical areas likely to be affected -**
  - The existing and approved land use;
  - The relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water and biodiversity) in the area and its underground;
  - The absorption capacity of the natural environment paying close attention to wetlands, riparian areas, river mouths, coastal zones, marine environment, mountain and forest areas, nature reserves and parks, European sites and other areas classified or protected under national legislation, areas in which there has already been a failure to meet environmental quality standards, densely population areas, landscapes and sites of historical, cultural or archaeological significance.

- **Consideration of the potential environmental impact of the development –**
  - A) the magnitude and special extent of the impact (for example geographical area and size of the population likely to be affected);
  - B) the nature of the impact;
  - C) the transfrontier nature of the impact;
  - D) the intensity and complexity of the impact;
  - E) the probability of the impact;
  - F) the expected onset, duration, frequency and reversibility of the impact;
  - G) the cumulation of the impact with the impact of other existing and/or approved development;
  - H) the possibility of effectively reducing the impact.

1.8 It does not follow that any proposal affecting the above areas/designations will automatically require an EIA, as this will depend on the assessment undertaken by the Local Authority against the criteria in Schedule 3.

1.9 Regulation 8(4) requires the developer to take into account, where relevant, the available results of any 'relevant assessment', which is defined in Regulation 2 as meaning, "*in relation to a proposed development, an assessment, or verification, of effects on the environment carried out pursuant to national legislation which is relevant to the assessment of the environmental impacts of the proposed development*". For example, this could include the Strategic Environmental Assessment (SEA) of the relevant Local Development Plan (LDP).

1.10 In considering the need for EIA, paragraph 28 of Circular 1/2017 confirms that the basic question to be addressed by the planning authority is *"Would this particular development be likely to have significant effects on the environment?".* The emphasis throughout the Regulations and Circular is upon the potential for <u>significant</u> environmental effects.

1.11 Paragraph 37 of the Circular confirms that the relationship between the proposed development and its location is a crucial consideration; for any given development proposal, the more environmentally sensitive the location, the more likely it is that the effects will be significant and will require EIA. For the purposes of the EIA Regulations, 'sensitive areas' comprise:

- Sites of Special Scientific Interest
- Land subject to Nature Conservation Orders
- European Sites
- National Scenic Areas
- World Heritage Sites
- Scheduled Monuments
- National Parks
- Marine Protected Areas

1.12 This Screening Request provides a summary of the baseline conditions of the Site and identifies the key environmental characteristics, sensitivities and surrounding environment in order to determine whether there is a likelihood of significant environmental effects as a result of the proposed development.

2.0 SITE DESCRIPTION & CONTEXT

2.1 The Site is located within the City of Edinburgh Council administrative boundary. The proposed development would be located on Land West of Hermiston House Road, Currie, EH14 4AG. The grid reference is: X 316900, Y 670000. The land subject to the requested EIA screening opinion is edged red, as shown on the following image, which is attached at Appendix A.

Figure 1: Site Location

2.2 The total development area to which this Screening Request relates comprises 30.5 hectares of land. As set out in Section 3 of this Screening Request 'Planning Application Approach', the broad proposed development extent will be established by the current masterplanning exercise, as is being informed by a suite of environmental and technical studies prepared by the appointed team of specialists. Substantive areas of greenspace would be retained and enhanced within the eventual development solution.

2.3 The subject site is located within the Edinburgh Green Belt, with the edges of the designation following part of the southern border. This has been shown below in Figure 2 and attached at Appendix B.

Figure 2: Green Belt Map

2.4 The site is surrounded by:

- To the north by a ribbon of trees which follows the Union Canal and an agricultural field and the M8 beyond;
- To the east by residential properties associated with the Hermiston Conservation Area;
- To the south by the A71, the Heriot-Watt University Campus and the Riccarton Campus and Business Park (designated in the Edinburgh City Plan 2030 as an area of economic importance); and
- To the west by the Gogar Burn - Hatton Bridge to Crow Wood Local Biodiversity Site (Local Nature Conservation Site) with agricultural fields beyond.

2.5 Access would be from the A71 which runs adjacent to the site, upgrading one of the existing field accesses to be appropriate for the proposed development.

2.6 The site is bound on all sites by mature hedgerow with residential properties adjacent to the southeastern corner of the site. There is also a ribbon of trees which follow the Union Canal which follows the Union Canal and the Gogar Burn which is follows the western site boundary.

2.7 Data Centres are recognised under the definition of Essential Infrastructure within NPF4. The NPF4 definition of essential infrastructure reads:

> *"Essential infrastructure includes digital communications infrastructure; telecommunications infrastructure; all forms of renewable, low-carbon and zero emission technologies for electricity generation and distribution and transmission electricity grid networks and primary sub stations; water and waste water infrastructure; and transport proposals and travel networks identified in the local development plan."*

2.8 It is clear that Data Centres are covered under this NPF4 definition via '*digital communications infrastructure*' and should be treated as such within the decision-making of the future application.

2.9 Additionally, National Development 12 (Digital Fibre Networks) outlines that 'Green Data Centres' classified as major developments within the planning hierarchy, are designated as National Developments. This designation highlights their strategic importance in the development framework.

2.10 The scheme will connect to the Currie Substation via an underground cable, which is approximately 1.7km to the southeast of the site. This will be consented under separate legislation by the relevant Statutory Undertaker and does not form part of this EIA screening request, nor the subsequent planning application.

2.11 The subject site is not within an environmentally sensitive area, as defined by Regulation 2(1) of the EIA Regulations (i.e. sites designated as a Site of Special Scientific Interest, Nature Conservation, European site, World Heritage site, Scheduled Monument, National Scenic Area, National Park and Marine Protected Area).

Planning History

2.12 The relevant planning history of the site, based on information available on public access viewing via City of Edinburgh Council's planning application search, is as follows:

- 13/04911/PAN | Residential development, horticultural visitor and education centre (the Calyx), new schools, community facilities, local retail facilities, local Class 2 and Class 3, Class 4, Class 10, Class 11, conference centre, hotel, a sports stadium/arena, sporting facilities, construction training centre, sustainable energy centre, green network, transport links, canal related uses and infrastructure. | Approved: 13-Dec-2013.

2.13 It should be noted that the development described in the above application has since taken place on a site to the east of the proposed development site.

3.0 THE PROPOSED DEVELOPMENT

3.1 The proposal is for a data centre campus, designed to deliver critical digital services while supporting Scotland's Net Zero and regeneration ambitions. Purpose-built to the highest technical, environmental, and safety standards.

3.2 Data centres are now classified as Essential Infrastructure under NPF4 in Scotland, the digital backbone of the UK economy and essential to the rise of AI. They support vital public services, and power sectors from research and finance to healthcare and education. They support the UK's economic strength, and ambition to lead in digital infrastructure.

3.3 The UK Government's National Compute Roadmap [1]sets out this vision, highlighting the vital role of data centres in enabling growth, resilience, and sustainability.

3.4 In summary, the Applicant proposes the submission of an application which will comprise the following elements, although the final design will be subject to change through the design process:

- Data Centre campus with 3no. buildings capable of 200MW utility demand capacity with a total GEA footprint of up to 54,690 sqm, including ancillary office/employment floorspace and emergency back-up generators (with fuel storage). The proposals will utilise one and two storey storeys, increasing the total floorspace quantum accordingly, with a maximum height of 23m (not including chiller plant/flues);
- A new electricity substation (including transformers and switchgear) with a 15,625sqm compound;
- A comprehensive scheme of landscaping and biodiversity enhancement, including provision of a Sustainable Drainage System (SuDS) and green wall features;
- Appropriate easements of any underground pipeline infrastructure/overhead power lines will be included, as required, in the design of the proposed development;
- Safeguarding of existing trees and landscape features where possible;
- 20% of the site area retained for community-use;

[1] https://www.gov.uk/government/publications/uk-compute-roadmap/uk-compute-roadmap

- Primary access would be taken from the A71 which runs adjacent to the south, with associated internal roads, servicing areas, car parking, security fencing and supporting infrastructure; and

- Onsite waste heat recovery plant to supply local heat off-takers.

3.5 The appropriate infrastructure to facilitate off-site waste heat reuse/transfer from the data centre campus. Opportunities for the reuse of excess waste heat from the data centre are currently being explored. Potential options for the subject proposals include:

- A horticultural glass house (typically no higher than 10m);

- A heat network/district heating system opportunity (typically necessitating an above ground district heating unit no higher than 8m, linking with underground flow and return pipes) for developers to utilise in the future, or in retrospective connections; and

- Working with local off-takers, such as the Herriott-Watt University Campus to the south of the site.

3.6 The Proposed Development will take approximately 3 years to complete once the construction phase commences.

3.7 The Proposed Development will be modest and appropriately contained within the context of the subject site, and no significant environmental effects are anticipated to arise as a result of the Proposed Development's scale, size or design.

3.8 The indicative masterplan for the development proposal accompanies this screening request (Ref: 2025-09-08 – Proposed Site Plan – Pre-App). At this stage the proposal is indicative and will be developed further using guidance from the ongoing stakeholder engagement as well as feedback from the Council. The indicative masterplan shows the provisional placement of infrastructure within the development site. The masterplan will evolve in response to further site surveys and stakeholder feedback to mitigate adverse impacts on existing site neighbours and local infrastructure.

4.0 CHARACTERISTICS OF DEVELOPMENT, ENVIRONMENTAL SENSITIVITY AND POTENTIAL SIGNIFICANT EFFECTS ON THE ENVIRONMENT

Applicable Thresholds

4.1 The site falls within Schedule 2 category 10(a) 'Industrial Estate Development Project' and exceeds the 0.5 hectare threshold.

Assessment of Possible Effects

4.2 Schedule 3 of the EIA Regulations states that when determining whether EIA is required, the characteristics of the development, the location, and the potential environmental effects must be considered. The factors to be taken into account as part of the screening process are set out below:

Use of Natural Resources – Land, Soil, Water, Biodiversity

Land

4.3 The construction of the Proposed Development will require the permanent use of land which comprises greenfield for the Data Centre and associated infrastructure. Beyond this, no unusual consumption of natural resources is expected during either the construction or operational phases. The development will not impact any additional land or deplete important, high-quality, or scarce resources. Consequently, significant loss of natural resources is not anticipated, and the overall impact on the land is expected to be minimal.

4.4 The project will involve a change in land use from greenfield land which is currently allocated within the Edinburgh Green Belt as a part of Edinburgh's adopted Local Development Plan (City Plan 2030). The effects are considered to be of local significance, and mitigation measures to offset the loss of vegetation, including new planting, the creation of wildlife habitats, and ecological enhancements can be implemented for the development.

4.5 Additionally, the future design of the scheme can be planned to preserve any existing green infrastructure, ensuring the protection of ecological corridors while also screening from the surrounding areas.

4.6 Given these measures, it is highly unlikely that the Proposed Development will result in a significant loss of natural resources, and no substantial adverse impacts on the land are expected.

Soil

4.7 As established, the 30.5ha site comprises greenfield land allocated within the Edinburgh Green Belt. While the proposed data centre campus will involve large floorplate(s), substantive areas of greenspace would be retained and enhanced within the eventual development solution.

4.8 The site is located on land that is identified as Grade 2 agricultural land on the National Scale Land Capability for Agriculture map[2]. The location of the site and its relationship to agricultural land can be seen in Figure 3 below, and is attached at Appendix C:

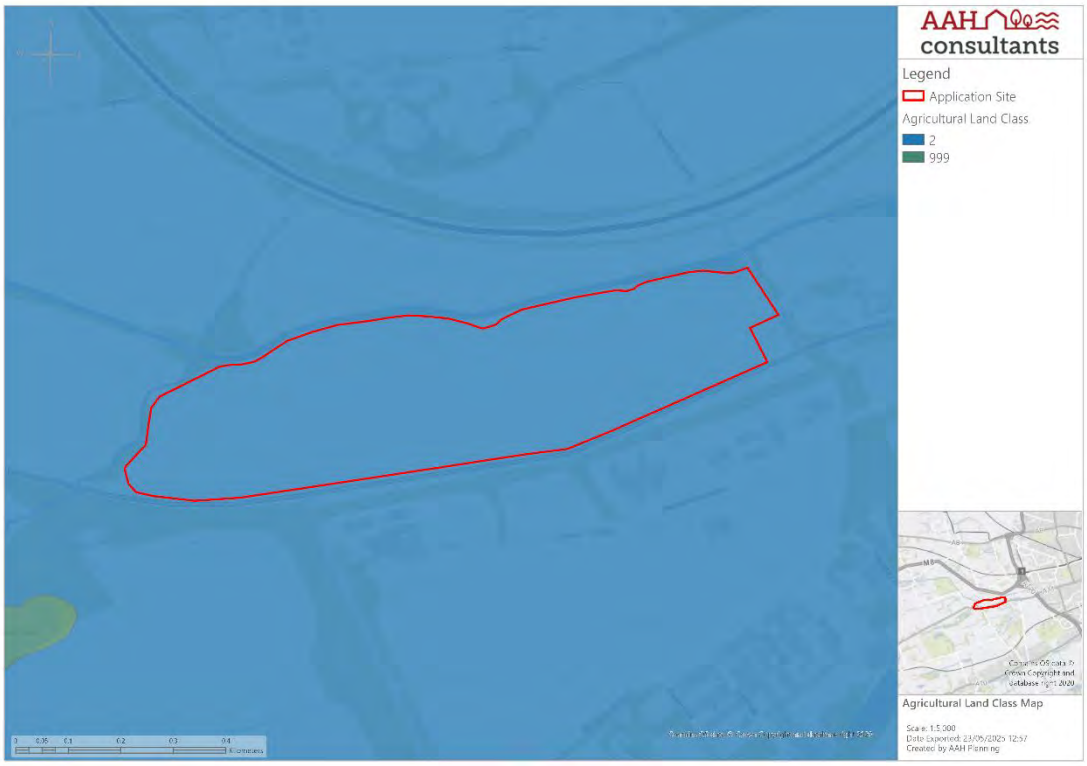


Figure 3: Agricultural Land Classifcation Map

[2] https://soils.environment.gov.scot/maps/capability-maps/national-scale-land-capability-for-agriculture/

4.9 Although the Proposed Development is on land classed as Grade 2 prime agricultural land, NPF4 states that developments which are defined as essential infrastructure with a specific locational can, under certain circumstances, be acceptable on prime agricultural land.

4.10 Furthermore, the proposed development will be supported by an Agricultural Land Classification Report.

4.11 In terms of peatland, the site is located entirely within Class 0 (Mineral Soil – Peatland habitats are not typically found on such soils), as shown on Figure 4 below, also provided at Appendix D.

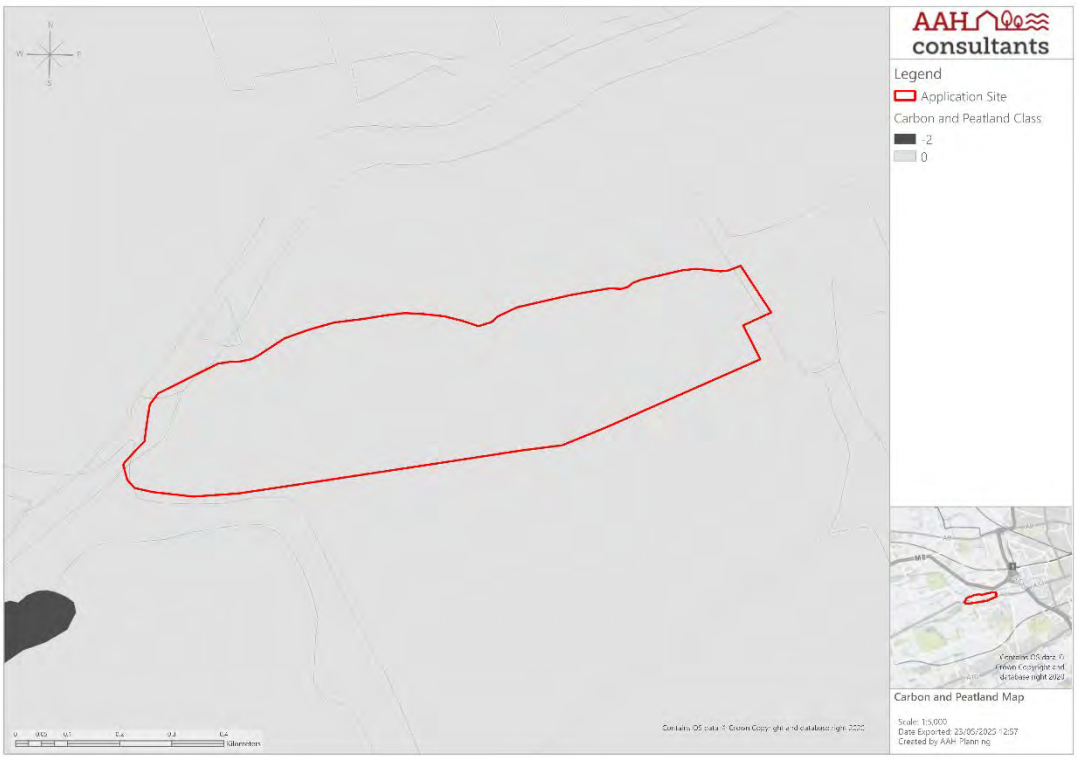


Figure 4: Carbon and Peatland Class Map

Water

4.12 River flood risk mapping from the Scottish Environment Protection Agency (SEPA), see below in Figure 5 and attached at Appendix E, shows that the site is located entirely within an area at low risk of flooding from rivers and sea. The maps show the Union Canal adjacent to the north of the site and the Gogar Burn to the west of the site.

Figure 5: River Flood Risk Map

4.13 Surface water flood mapping from SEPA indicates areas of surface water flood risk on the site, as shown on the below in Figure 6, and attached at Appendix F.

Figure 6: Surface Water Flood Risk Map (SEPA)

4.14 It should be noted that the nature of this mapping is to provide community level awareness of flood risk, and it is not intended for use at site level.

4.15 Where necessary, sustainable drainage systems will be implemented to regulate water flow and enhance water quality. As a result, no significant impacts on receiving watercourses are expected, and the Proposed Development is anticipated to have a negligible effect on water resources. Overall, it is unlikely that the development will have a significant impact on hydrology.

4.16 The future application will be accompanied by a detailed Flood Risk Assessment and Drainage Strategy to ensure that the development will be safe for its lifetime, taking account of the vulnerability of its users without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

4.17 Water is supplied for various different critical and non-critical uses throughout the data centre, each with its own requirements and patterns of use. These include the data hall cooling systems, fire protection (sprinkler tanks), office heating and cooling circuits, and domestic water for staff areas such as toilets and kitchens.

4.18 The proposed Data Centre will utilise a closed-loop water circuit integrated with air-cooled chillers, resulting in minimal water consumption compared with evaporative or open-loop

systems. Closed-loop cooling recirculates the same coolant within a sealed system, significantly reducing losses and removing the need for the continuous water make-up required in evaporative cooling. The water used is typically treated — such as deionised or demineralised water — and dosed with corrosion inhibitors (e.g., nitrites or molybdates) and biocides to suppress bacterial or algal growth.

4.19 These sealed circuits recirculate water, significantly reducing consumption. After the initial commissioning fill, only small top-ups are required to maintain pressure. Closed-loop design, corrosion-resistant pipework, and routine monitoring will ensure water use remains low and any leaks or inefficiencies are quickly identified. This approach aligns with best practice for water-efficient, sustainable, and resilient data-centre cooling infrastructure. Domestic water will serve office and amenity areas, forming the most regular but predictable element of site demand.

Nature/Biodiversity

4.20 The Application Site is not subject to any statutory nature conservation designations, nor is the Site within an environmentally sensitive location. The Site excludes other features listed at Schedule 3 of the EIA Regulations.

4.21 Within 2km of the Application Site there are the following ecological designations, as shown on the map extract below, which is also provided at Appendix G:

- Local Nature Conservation Site, “Union Canal - Ratho to Hermiston”, adjacent to the north of the site;
- Local Nature Conservation Site, “Gogar Burn - Hatton Bridge to Crow Wood”, adjacent to the east of the site;
- Local Nature Conservation Site, “Gogar Burn - Union Canal to Fairview”, approximately 0.05km to the north of the site;
- Ancient Woodland (unnamed), located approximately 0.05km to the southwest of the site;
- Local Nature Conservation Site, “Riccarton Estate”, located approximately 0.1km to the southeast of the site;
- Ancient Woodland (unnamed), located approximately 0.1km to the southeast of the site;
- Ancient Woodland, “Crow Wood”, located approximately 0.15km to the west of the site;
- Ancient Woodland (unnamed), located approximately 0.4km to the west of the site;
- Ancient Woodland (unnamed), located approximately 0.6km to the south of the site
- Ancient Woodland (unnamed), located approximately 0.65km to the south of the site;

- Ancient Woodland (unnamed), located approximately 0.75km to the northwest of the site;
- Ancient Woodland, “Muir O’ Dean”, located approximately 0.95km to the southwest of the site;
- Local Nature Conservation Site, “Union Canal - Hermiston to Slateford”, approximately 1.15km to the east of the site;
- Ancient Woodland (unnamed), located approximately 1.2km to the north of the site;
- Ancient Woodland (unnamed), located approximately 1.7km to the north of the site;
- Local Nature Conservation Site, “Gogar Burn - Gogar Mains & Gogar Park”, approximately 1.8km to the north of the site; and
- Ancient Woodland (unnamed), located approximately 1.9km to the southeast of the site.

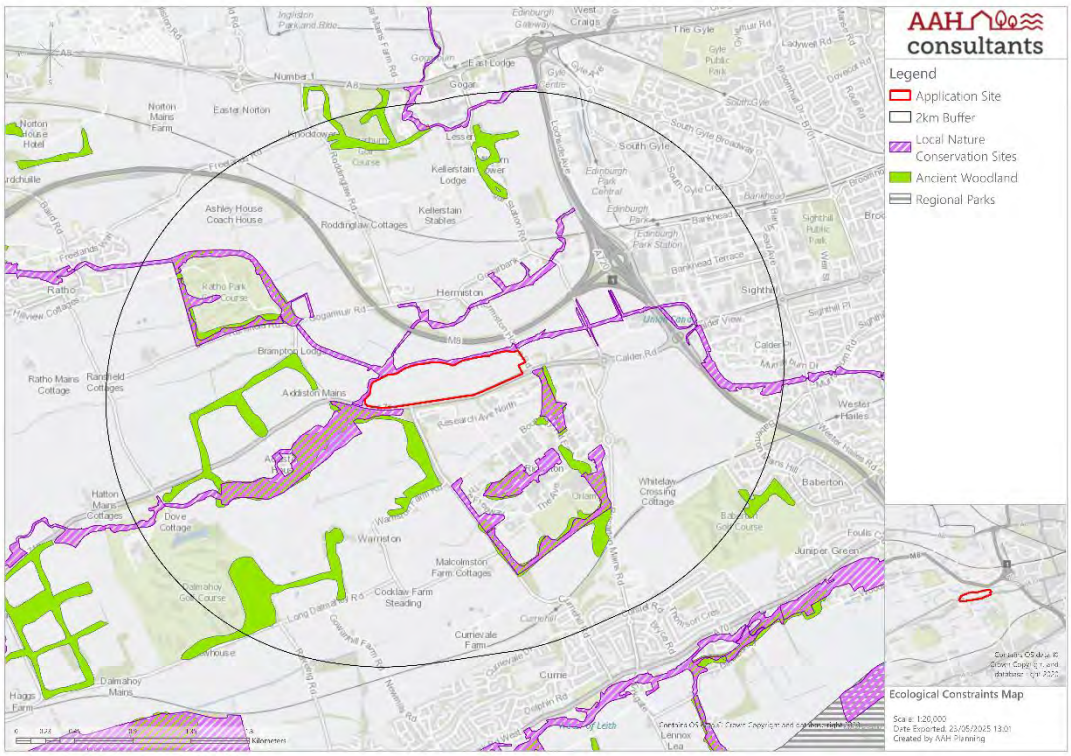


Figure 7: Ecological Constraints Map

4.22 It is considered that the site is located sufficiently far away from SSSIs that development of the scale and type proposed would not result in any impacts. It is also worth noting that due to the distance, there is little to no direct connectivity between the site and the ecological features identified above.

4.23 The impact on ecological features both within the site and wider area is an important consideration. A Preliminary Ecological Appraisal (PEA), including a Preliminary Protected Species walkover, will be undertaken and support any future application, with its recommendations, mitigation and conditions considered as part of the overall design process

for the proposals. It is not anticipated that the development will adversely impact any protected species or habitat due to the ability to locate the built form away from any ecologically sensitive receptors and the distance between the site and nationally designated sites. The site can accommodate the creation of new habitat biodiversity areas to improve existing habitats and contribute to overall biodiversity improvements.

4.24 Whilst there may be an effect on biodiversity, the Proposed Development seeks to retain and enhance areas of wildlife value where possible. Through the implementation of appropriate measures during construction, effects can be managed and are unlikely to be unusually complex or significant.

4.25 Given the location of development, and the opportunity to create landscape features and provide landscape buffers/habitat improvements, it is not considered that any impacts would be significant in the context of the EIA Regulations.

Transport and Access

4.26 It is proposed that the site will be accessed from the A71 through upgrading one of the existing field accesses and upgrading the road network to facilitate access. It is anticipated that construction traffic and eventual site users would approach the site westbound on the A71 which strategically links from The City of Edinburgh Bypass, which by following clockwise leads to Junction 1 of the M8 and by following anti-clockwise to the A1.

4.27 The nearest bus stops are located along the A71 and on Research Avenue North, which is to the south of the site in the Riccarton Campus & Business Park / Hariot-Watt University Campus. The nearest railway station is Edinburgh Park Central, approximately 1.5km northeast of the subject site or alternatively, the Curriehill station which is approximately 1.7km to south of the site.

4.28 The proposed development will result in a permanent change in the number of vehicles using the local and wider road network. The construction phase would involve changes to baseline traffic movements through the use of HGVs.

4.29 A Transport Statement will be submitted as part of the planning application to fully assess and mitigate transport effects. Consequently, it is anticipated there would be no significant effects in regard to Transport and Access arising from the proposed development that would constitute EIA development.

Waste

4.30 Waste will be produced during the construction and maintenance phases of the development. Wherever possible, this waste will be reused or recycled. Minimal waste is expected from site preparation and clearance works, as the Proposed Development aims to retain key vegetation features. Significant quantities of construction waste are not anticipated.

4.31 During operation, the Proposed Development will only generate low levels of domestic-type waste. All waste will be managed in accordance with relevant legislation, best practices, and the requirements of the Local Authority.

4.32 It is anticipated that there will be no significant effects of the Proposed Development in terms of waste production.

Pollution and Nuisances (Noise and Air Quality)

4.33 The site is not located within an Air Quality Management Area (AQMA) and is neither adjacent to nor in close proximity to any designated AQMA.

4.34 Vehicle emissions will be generated during both the construction and operational phases, with construction activities involving changes to traffic patterns, including the use of HGVs. Once operational, the development is expected to increase vehicle movements on the local road network. A Transport Statement will accompany the planning application to assess and mitigate any highways-related impacts.

4.35 During the construction phase, some localised noise and temporary reductions in air quality (such as dust and emissions) may occur due to earthworks, on-site machinery, and vehicle movements for material deliveries. However, dust generation will be controlled using standard best practice measures, enforced through a Construction and Environmental Management Plan (CEMP) secured via planning condition, thus significant adverse effects are not anticipated.

4.36 The closest noise receptors to this development are the closest dwellings to the site:

- Dwellings west of Hermiston House Road; and
- Dwellings east of Hermiston House Road.

4.37 Based on imagery of the surrounding environment, the main noise source in this area is expected to be road traffic from the A71 to the south of the site, the M8 to the north of the

site and connecting roads. The publicly available strategic noise maps, published by Scotland's Noise, confirm this; Figure 8 below shows the consolidated road, rail and industry noise levels (Consolidated, L16H) based on 2021 data.

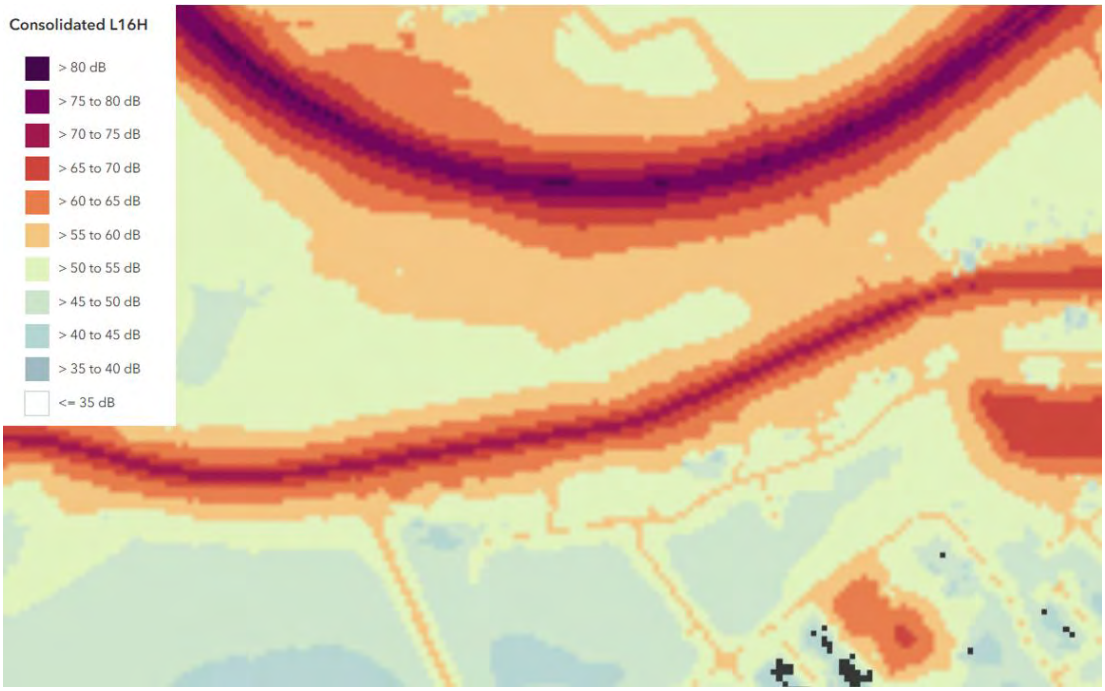


Figure 8: Map extract showing the consolidated noise levels retrieved 23rd May 2025 from Scotland's Noise

4.38 Mitigation at source is typically the most effective method, particularly when there are a range of noise sensitive receptors. Where practicable, operational and layout changes should be considered. Screening can be effective, particularly in combination with other methods. Mitigation at the receiver is generally not possible for commercial and industrial developments. The future application will be supported by a detailed Noise Assessment which will take account of site-specific development and provide appropriate mitigation measures.

4.39 To ensure the Proposed Development does not lead to long-term air quality concerns, an Air Quality Assessment will also be submitted as part of the future planning application.

4.40 The development is generally not expected to generate significant noise or emissions – the only instance where these may be at a more notable level is in the rare event that the emergency generators are activated simultaneously during a power outage. Such occurrences would be brief and highly infrequent as routine testing of the generators will be conducted to maintain efficiency, aligning with the scale and function of the site without causing excessive disturbance or pollution. The site is already subject to ambient noise from the adjacent major

highways network and commercial/educational uses; appropriate noise mitigation measures will be included to minimise any potential impacts.

Major Accidents and/or Disasters

4.41 The site is not known to be prone to land instability or extreme weather conditions, including fluvial flood risk. Construction will follow standard industry practices, with no complex or unusual processes involved, ensuring that potential risks are minimised.

4.42 No significant risks of major accidents or disasters—including those linked to climate change—are anticipated during the operational phase.

4.43 Given the nature and location of the development, it is not considered to be at risk of, or contribute to, significant impacts related to major accidents or disasters.

Climate Change and Sustainability

4.44 This EIA Screening Request is supported by a series of reports, prepared by Cundall, which provide indicative forecasts for potential emissions and associated indicative mitigation measures which can be implemented into the final masterplan for the scheme. The reports include:

- Energy Statement
- Sustainability Statement
- Operational Energy Statement
- Climate Change Risk Assessment
- Greenhouse Gas Emissions Report
- Whole Life Embodied Carbon Assessment

4.45 These reports should be read in conjunction with this EIA Screening Request Report.

Human Health

4.46 During the enabling works and construction phase, some level of disruption and inconvenience is expected, in line with typical construction activities. This may include external work lighting, security lighting, noise and dust emissions from machinery, vehicles, and various construction processes, as well as surface water run-off from material stockpiles and equipment noise. However, these impacts will be effectively managed and kept within acceptable limits through the implementation of a Construction Environmental Management Plan (CEMP), alongside best practice methods and appropriate safety measures.

4.47 In line with relevant legislation, stringent controls will be in place to prevent accidental spills of contaminants during the construction of the Proposed Development. These mitigation measures are considered standard and appropriate for a project of this nature and scale.

4.48 A review of historic land use maps confirms that no previous landfill sites are recorded within the site boundary. Therefore, it is considered that there is a low risk of contamination.

4.49 The future planning application will be supported by a detailed Flood Risk Assessment (FRA) and Drainage Design, which will consider all necessary mitigation measures to prevent any contaminants from entering nearby watercourses.

4.50 Once operational, the Proposed Development is not expected to pose any unusual risks to human health. The associated activities do not typically involve hazardous materials or toxic air emissions. Diesel stored on-site for emergency generators will be subject to standard safety protocols, and any potentially hazardous substances will be managed and stored in full compliance with regulatory requirements.

Cultural/Heritage

4.51 The subject site does not include any designated heritage assets or statutory/non-statutory designated sites or Conservation Areas. The subject site is adjacent to the Union Canal Scheduled Monument to the north and the Hermiston Conservation area to the east.

4.52 There will be no direct work on any heritage asset as part of the proposal. The key issue with respect to the proposal will be whether there is likely to be any impact on the setting of the nearest and most prominent heritage assets.

4.53 The heritage assets located within a 2km radius of the site are shown on the map extract, which is also provided at Appendix I:

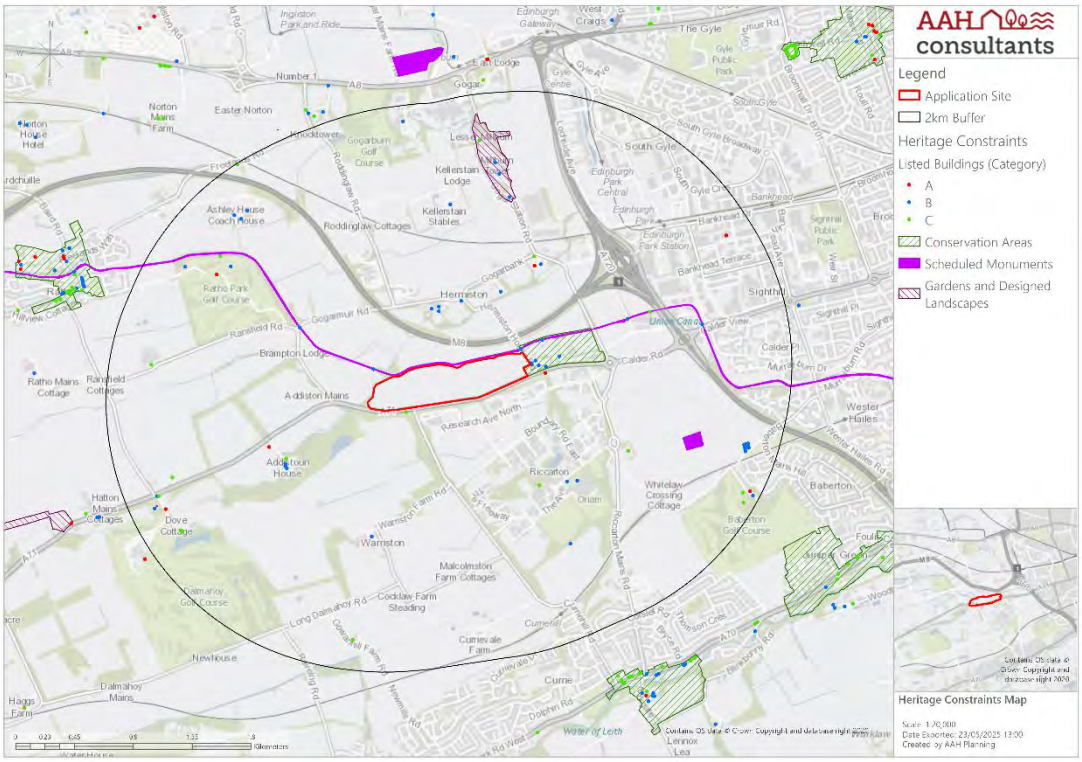


Figure 9: Heritage Constraints Map

4.54 The Applicant is aware that the Union Canal Scheduled Monument and the Hermiston Conservation Area are both adjacent to the proposed development site. It is anticipated that the iterative design process will ensure sensitive areas are avoided, and an adequate buffer is provided to respect the setting of surrounding heritage assets.

4.55 A Cultural Heritage Assessment (CHA) will support the future application to fully consider the surrounding archaeological and built heritage significance in relation to the proposed development. It is envisaged that the design of the proposed data centre campus development will be informed by the findings of the CHA to ensure that significant adverse effects upon the integrity of the setting of the neighbouring heritage assets does not arise.

4.56 Underground heritage assets and archaeological impacts will also be considered. As a part of ongoing pre-application discussions with the City of Edinburgh Council, it was identified by the City of Edinburgh Council Archaeologist that the Proposed Development site is within an area of archaeological potential, principally in terms of prehistoric and early medieval activity. As such, the Council has requested that archaeological investigation (a combination of fieldwalking, metal detecting and geophysical surveying) be carried out pre-determination, so that they can make an informed decision on the potential impact of the development on buried archaeological remains.

Core Paths

4.57 There are no Core Paths within the site, however, there are Core Paths which follow the Union Canal, adjacent to the north of the site, and there is a Core Path adjacent to the east of the proposed development site which links the Union Canal to the Riccarton Campus & Business Park / Hariot-Watt University Campus. These Core Paths have been shown in Figure 11 below and attached at Appendix J:

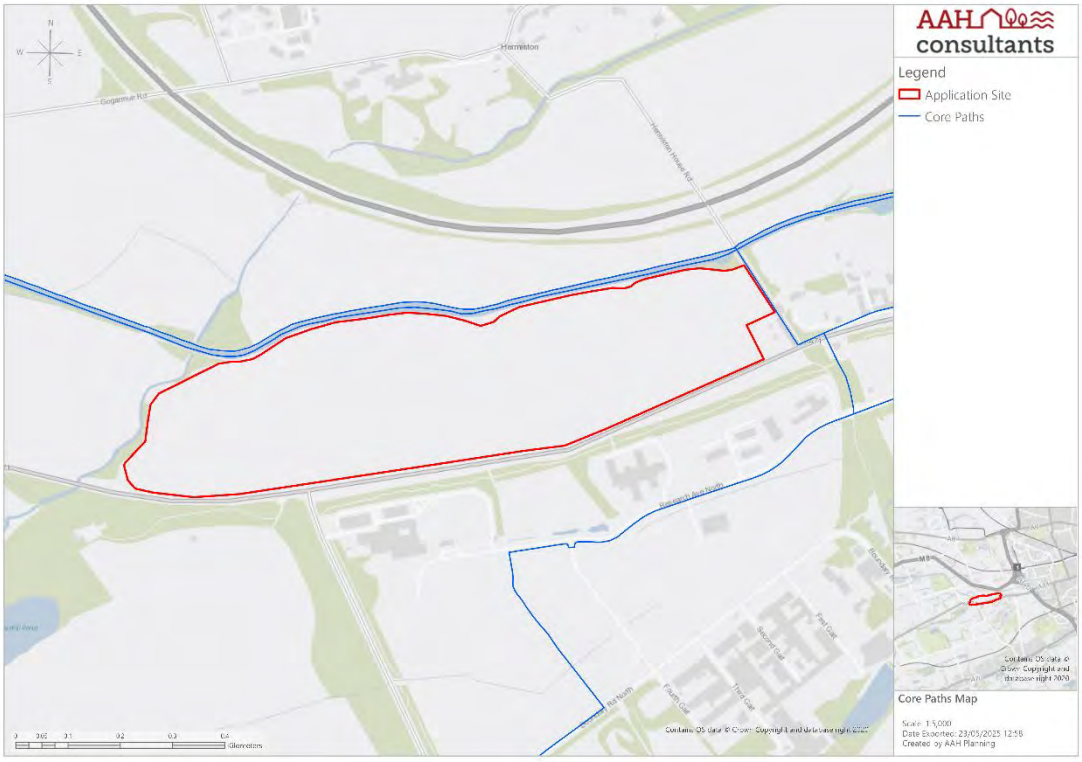


Figure 10: Core Paths Map

4.58 It is envisioned that the Core Paths surrounding the site can be used by future users of the site to access the site sustainably.

Landscape and Visual

4.59 The following is a brief overview as the application will be accompanied by a landscape and visual assessment carried out by a Landscape Architect in accordance with the Landscape Institute Guidelines for *Landscape and Visual Impact Assessment, Third Edition,* 2013 (GLVIA3) and will reflect current best practice and guidance. GLVIA3 defines the two components of landscape and visual assessment as:

1. Landscape effects: effects on the landscape as a resource in its own right;

2. Visual effects: effects on specific views and on the general visual amenity experienced by people.

4.60 As part of the iterative process promoted by GLVIA3, it is proposed that consultation would be carried out with relevant officers at the planning authority to define and agree the methodology for the assessment, including the methodology, study area, viewpoints, and requirement and type of visualisations. This process would also include discussion regarding mitigation in order to reflect appropriate local and regional aims and objectives as defined in planning policy and published character assessments.

4.61 **Site Location:** The Site is located at the western settlement edge of Edinburgh and comprises of one rectilinear parcel of land adjacent to the southern edge of the M8. It is situated between the A71 on its southern boundary and the Union canal on its northern boundary. To the Site's south, over the A71, is the Herriot Watt University Edinburgh campus, with adjacent offices and commercial units including the Scottish Blood Transfusion Service and Scottish Water. These offices and commercial units lie adjacent to the southern boundary of the Site. The western boundary of the Site is defined by vegetation and the course of the Gogar Burn. The Site's eastern boundary is defined by Hermiston House Road with a row of cottages on the western side of this road, and their gardens, excluded from the Site boundary.

4.62 **Land-use and Boundaries:** Historical maps show that the Site has always been agricultural land but, in the past, the Site was partitioned into six fields. Today, the Site is one large field used for arable farming. The Site's southern boundary, with the A71, consists of a low well-cut hedgerow mostly continuous, but with some localised gaps.

4.63 A footpath runs along the A71, narrowing in places, but continuous along the Site's entire southern boundary between Addiston Farm Road and Hermiston House Road. The northern

boundary of the Site consists of a post and rail livestock fence beyond which is a partially wooded and vegetated embankment running along the southern edge of the Union canal.

4.64 The tow path of the canal is located on the northern side of the canal and views into the site are filtered and reduced by this vegetation on the southern bank. The only other feature of interest on this boundary is a small irrigation pond, located within the Site, adjacent to the canal, near the Site's north eastern corner. The Site's eastern boundary, with Hermiston House Road, is mostly hedgerow backed by a post and rail fence probably needed because this hedgerow is less dense and more gappy than that found on the Site's southern boundary.

4.65 There is an access point into the Site in the north eastern corner which is presently lacking a gate and is blocked by concrete barriers. A row of period cottages forms the south eastern boundary of the Site. These are backed by gardens with fenced boundaries and mature trees and hedges including Leylandii. Beyond this is an overgrown area of scrub consisting of mature hawthorn and elderflower clumps which is also outside the Site boundary. On the Site's western side, the boundary consists of post and wire fencing beyond which is mature deciduous woodland which slopes down towards the Gogar Burn. This woodland is continuous along the Site's western boundary following the meandering course of the burn and connecting with the vegetation on the southern bank of the canal.

4.66 The canal passes over the burn via an aqueduct adjacent to the north western corner of the Site. The local landscape remains mostly open countryside, but is heavily influenced by its edge of city location with commercial and business land uses, golf courses and historic houses with parkland grounds all prevalent. Associated with the parkland settings are dense blocks of woodland often following water courses, ponds, and estate boundaries. Some of these historic houses have become hotels or golf courses or their land developed into campus or business parks e.g. Heriot-Watt University, Dalmahoy Hotel and County Club, Ratho Park Golf Club or the Royal Bank of Scotland Conference Centre. The Site benefits from woodland surrounding it on its southern boundary, related to the Heriot Watt Campus, the north boundary, related to the Canal, and its western boundary, related to Gogar Burn.

4.67 These areas of woodland/tree cover provide a wooded appearance and character to the landscape that contrasts with the areas of open farmland. This woodland cover means that the Site is well contained visually within the wider landscape and from longer views. However, the A71, and the canal, are well used transport and recreational corridors, bringing many potential receptors past the Site and will potentially expose it to close views.

4.68 **Planning Designations of the Site and the Surrounding Landscape:** The Site is located at the western edge of Edinburgh, 3.5 km to the southeast of the airport. The Site is located within countryside designated as Green Belt on the City of Edinburgh Local Development Plan Map. The site also lies within an area designated as a Special Landscape Area (SLA) which includes the Site and the land to the north as far as the A8. To the west the SLA is defined by Roddinglaw Road and to the east it is defined by Grogar Station Road and the City By-pass (A720).

4.69 This area includes the Hermiston Conservation Area, Millburn Tower, Lesser Millburn, Grogar, RBS Conference Centre, Grogar Burn Golf Course, Kellerstain Lodge, Kellerstain Stables, Grogarbank, Grogarmuir Road and the land to the north and south of the M8. The land to the east of the Site including the cottages on Hermiston House Road is within a Conservation Area. The Site lies in close proximity to the Herriot Watt campus and Hermiston Gait employment centres with the land north of this (south of the Airport) allocated as a Major New Development Area with Business Investment, Public Transport and Housing promoted. The Site lies 3.5km to the north of the Pentland Hills regional park containing Bonaly Country Park.

4.70 The Site lies adjacent to locally designated landscape sites including the canal corridor which is a Local Biodiversity Site and Scheduled Monument, and the route of the Gogar Burn to the west is part of a Local Biodiversity Site associated with the grounds of Addiston House to the south west. Core paths in the area include the Canal CEC 15. Union Canal and CEC 17. Riccarton which passes along Hermiston House Road.

4.71 **Landscape Character:** The Site is located within the NatureScot Landscape Character Assessment (LCA) study of Lothians, which is broken down into more detail into Landscape Character Types (LCTs), with the Site falling within LCT 274: 'Lowland Plain', which is considered "*high quality agricultural land with substantial but localised urban fringe influences around motorways and Edinburgh Airport*". It is described as having a "*Smoothly rolling, large scale agricultural plain with local interruptions of volcanic hills forming visual foci. Rivers cut thorough the farmland in incised valleys" with "High quality agricultural land with a predominantly rural character, divided into a strong pattern of large arable fields by fences, hedges, occasional walls and a network of shelterbelts. Policy Woodlands and shelter belts are associated with designed landscapes, mansions and gatehouses and boundary wall contributing to character*".

Coal Mining

4.72 The site is not located within a Coal Mining Reporting Area and there are no specific coal mining features identified within the red line boundary on the Mining Remediation Authority Maps.

4.73 The future application will be supported by a Coal Mining Risk Assessment and Geo-Environmental Assessment, which will provide a comprehensive overview of soil and ground conditions, and any necessary mitigation measures.

Absorption Capacity of Natural Environment

4.74 The subject site is not within an environmentally sensitive area, as defined by Regulation 2(1) of the EIA Regulations (i.e. sites designated as a site of special scientific interest, nature conservation, European site, World Heritage site, scheduled monument, National Scenic Area, National Park and marine protected area).

4.75 As previously highlighted, the site is allocated within the Edinburgh Green Belt as shown in the City of Edinburgh Council's Local Development Plan, City Plan 2030, policies map. As previously discussed, the Proposed Development falls under the NPF4 definition of 'Essential Infrastructure'.

4.76 Additionally, National Development 12 (Digital Fibre Networks) outlines that 'Green Data Centres' classified as major developments within the planning hierarchy, are designated as National Developments. This designation highlights their strategic importance in the development framework.

4.77 As previously highlighted, the site comprises of an agricultural field which is surrounded by mature hedgerow and with the Union Canal adjacent to the north of the site. Although no Core Paths interact directly with the site, there are Core Paths to the north of the site which follow the Union Canal which will be retained as a part of the development, the Core Paths will also be able to be utilised by users of the site to encourage sustainable access options.

4.78 Paragraph 41 of the Circular states that the planning authority must take into account any proposed mitigation measures, as well as the description of development, in reaching their Screening Opinion. Key mitigation measures for the proposed data centre campus will be at the forefront of the design evolution process whereby the physical limits will be determined with regard to a range of potential impacts, informed by the project team and various technical disciplines, including inter alia:

- Potential ecological impacts and the scope for biodiversity improvements;
- Potential impacts on any on-site protected species or habitats;
- Potential for construction and operational impacts; and
- The likely extent of landscape and visual impacts.

4.79 No significant effects are anticipated as a result of the absorption capacity of the natural environment.

Cumulative and Interactive Effects

4.80 A search of the City of Edinburgh Council planning portal has been undertaken within a 3km radius from the centre of the Proposed Development. The following applications of relevance, from the past 5 years, were found:

- **25/02115/FUL** | Erection of food container units, with associated landscape and ground works. | Awaiting Decision
- **25/01968/PAN** | Green data centre development and relocation of green space | Consultation Approved: 02-May-2025
- **25/01028/CLP** | Proposal for food and beverage units within car park of Westside Shopping Plaza. Sui Generis - Hot food takeaways, Food and beverage units - nom 15m2 floor area per unit. 14No units proposed, totalling 210m2 floor area. | Withdrawn: 24-Apr-2025
- **25/00460/SCR** | Request for EIA Screening Opinion. Regard construction and operation of energy generating system, comprise of battery energy storage system | Non-EIA: 14-Feb-2025
- **24/05242/FUL** | Proposed brewery with associated access, infrastructure and landscape works (renewal of consent 20/02083/FUL). | Awaiting Decision
- **23/02862/FUL** | Two storey extension, infill extension, outbuildings, and alteration to existing access to form additional hardstanding and turning area. | Permitted: 01-Oct-2024
- **20/03901/FUL** | Change of use class from Class 8 Residential Institution (care home / hospice) to Class 9 houses. Removal of non original extensions to North & West of the property, replaced with new town houses. Internal alterations to retained property.

Remove and replace existing glazing with double glazing & upgrade existing services. New parking and landscaping arrangements. | Permitted: 18-Aug-2022

- **20/02985/OBL** | Discharge of the 1993 Section 50 Agreement | Accepted: 04-Sep-2020

4.81 All of the above identified sites are physically distinct from the subject site due to existing built structures, natural topography, and intercepting trees and/or vegetation. As a result, significant visual cumulative effects are unlikely to occur, given the degree of separation. Potential cumulative impacts related to construction traffic, noise, and dust will be evaluated in dedicated environmental reports submitted with the future application.

4.82 Notwithstanding the fact that each of the above schemes will incorporate its own mitigation measures to manage any adverse impacts, it is not expected that the identified schemes will result in substantial additional cumulative effects.

5.0 CONCLUSION

5.1 This Screening Request has been prepared in order to obtain an Environmental Impact Assessment Screening Opinion from City of Edinburgh Council in accordance with Regulation 8 of The Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 17 for the construction of a Data Centre Campus on Land West of Hermiston House Road, Currie, EH14 4AG.

5.2 The Proposed Development was previously screened with City of Edinburgh Council and determined non-EIA. A second EIA Screening Request has been prepared in order to 're-screen' the site with further information relating to climate change and sustainability. Since the first screening, the design process has evolved and the new layout provides indicative detail from which to base the screening process, based on likely minimum built form parameters. Notwithstanding this, the layout maybe subject to amendments as the design progresses.

5.3 It is considered that the subject proposals fall within Category 10(a) of Schedule 2 'Industrial Estate Development Projects' exceeding 0.5 hectares. Such proposals require an EIA if they are considered likely to have significant effects on the environment by virtue of characteristics, location, and potential impacts.

5.4 In terms of Schedule 3 (3) of the EIA Regulations, the potential for significant environmental effects can be summarised as below:

A) The magnitude and special extent of the impact

5.5 The magnitude and spatial extent of the potential impacts identified in this Screening Request are considered to be localised to the site and immediate environment only. Considering the nature of the proposed development, the magnitude of these impacts is unlikely to be significant. There is no indication that the impacts will be great enough to affect a large population such that EIA is required.

B) The nature of the impact;

5.6 The proposed development has the potential to give rise to environmental effects during the construction and operational phases. During construction, typical environmental impacts are likely to comprise increased traffic generation, noise, ground and ecological disturbance. It is expected that these potential impacts can be avoided and/or minimised to non-significant

levels through the design process and through adoption of best practice construction techniques. Operational impacts are likely to comprise mainly landscape and visual impacts, with potential low-level noise and operation activity.

5.7 Potential environmental impacts will be considered throughout the design evolution process, with mitigation measures built in to the future site design. Site specific environmental and technical studies to consider potential effects, which are to be submitted with the future application, are considered to be more proportionate to the nature and scale of development proposed than an EIA report.

C) The transboundary nature of the impact;

5.8 No such impacts are considered likely to arise with the proposals.

D) The intensity and complexity of the impact;

5.9 Given the nature of the proposed development and site-specific characteristics, the intensity and complexity of the environmental impacts are not considered to be particularly severe or hazardous to warrant an EIA.

E) The probability of the impact;

5.10 The future application will be supported by a suite of environmental and technical reports which will identify and assess the most likely environmental impacts, along with commensurate mitigation measures that can be integrated into the site design to address environmental effects, and contribute to environmental enhancement where possible.

F) The expected onset, duration, frequency and reversibility of the impact;

5.11 The identified environmental impacts during the construction phase will largely cease once this stage is completed. Longer term impacts will be landscape and visual, low-level noise and an element of increased traffic generation during operation.

5.12 The design of the future scheme will be a result of an iterative and informed process, considering all key points from accompanying environmental and technical reports, to ensure that the proposals avoid or minimise any significant effects as far as practicable.

G) The cumulation of the impact with the impact of other existing and/or approved development;

5.13 There are a number of other proposals within the wider area, as identified at section 4.70 of this report. However, these surrounding development sites are physically distinct from the subject site due to existing built structures, natural topography, and intercepting trees and/or vegetation. As a result, significant environmental cumulative effects are unlikely to occur, given the degree of separation.

H) The possibility of effectively reducing the impact.

5.14 It will be possible to reduce potential environmental effects associated with the proposed development through informed site design and technical input. In terms of operation, it will also be possible to reduce any impacts by restricting activities, where appropriate, through the imposition of planning conditions on any permission that may be issued.

5.15 Considering the nature of the proposed development, and the relatively low environmental sensitivity of the site, the issues identified are not considered to be of such significance to warrant an EIA.

Summary

5.16 The characteristics of the Proposed Development and Site have been set out within this Screening Request, and an appraisal of the likely environmental effects arising from the proposals has been provided in line with the EIA Regulations.

5.17 The Applicant has appointed a team of specialists to advise on a range of environmental and technical matters likely to be of relevance to the site design and determination of the future application. Whilst the proposal has the potential to give rise to environmental effects during the construction and operation phases, it is expected that these impacts can be avoided or minimised to non-significant levels through the design process and/or be subject to controls through adherence to best practice techniques.

5.18 The proposed development is not considered to be a particularly complex land use likely to give rise to hazardous, widespread or particularly complex environmental impacts. Following construction, the main longer-term impacts are likely to be landscape and visual, transport, and low-level noise. These potential effects can be addressed through environmental studies which would accompany the future application, without recourse to an EIA.

5.19 Nonetheless, it is envisaged that a future application would be supported by the following planning, design and environmental technical studies, subject to further pre-application consultation with City of Edinburgh Council:

- Planning Statement;
- Design and Access Statement;
- Data Centre Development Report (inc. site selection process/site requirements);
- Pre-Application Consultation (PAC) Report
- Full suite of Architectural Drawings;
- Covering Letter;
- Flood Risk Assessment and Drainage Strategy;
- Transport Assessment;
- Travel Plan;
- Geo-Environmental Assessment;
- Heritage Statement;
- Agricultural Land Classification Report;
- Arboricultural Impact Assessment;
- Air Quality Impact Assessment;
- Economic Benefits/Needs Assessment;
- Ecology Assessment and Biodiversity Net Gain Calculations;
- BREEAM Pre-Assessment Report/Energy Statement;
- Landscape and Visual Impact Assessment;
- Construction Management Plan;
- Acoustics Assessment;
- Fire Safety Strategy;
- Lighting Assessment;
- Fuel Storage Report; and
- Waste Management Plan.

5.20 Confirmation is sought that the above list is appropriate.

5.21 Should the Council determine that an EIA application is necessary, it is proposed that the scope of such an assessment be focussed on:

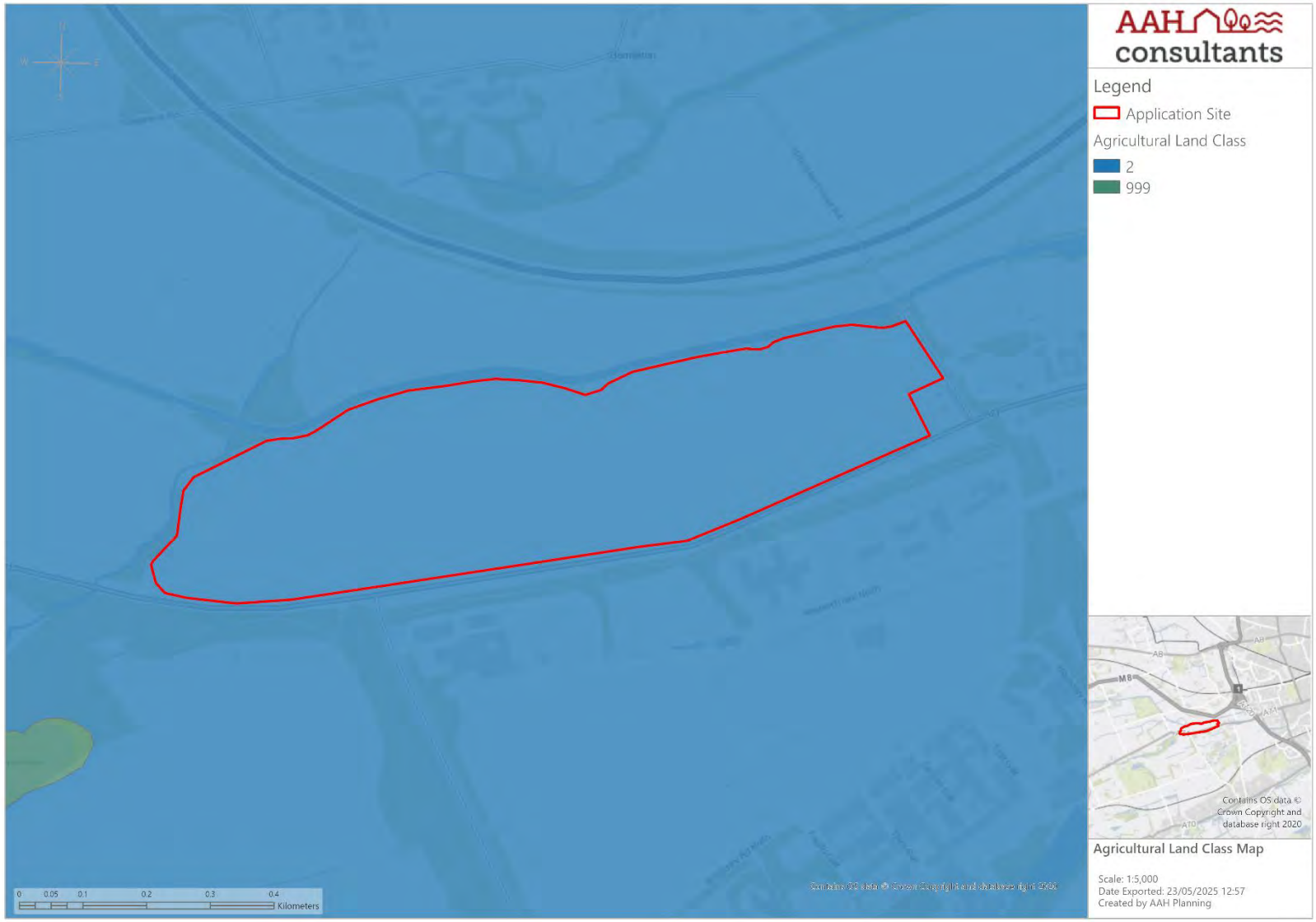
- Greenhouse Gases;
- Air Quality and noise emissions; and
- Cumulative Effects

5.22 We look forward to receiving the Council's response to this Screening Request, taking into account the criteria in Schedule 3 of the Regulations on whether the development would be likely to have significant environmental effects within the designated 21-day timeframe.

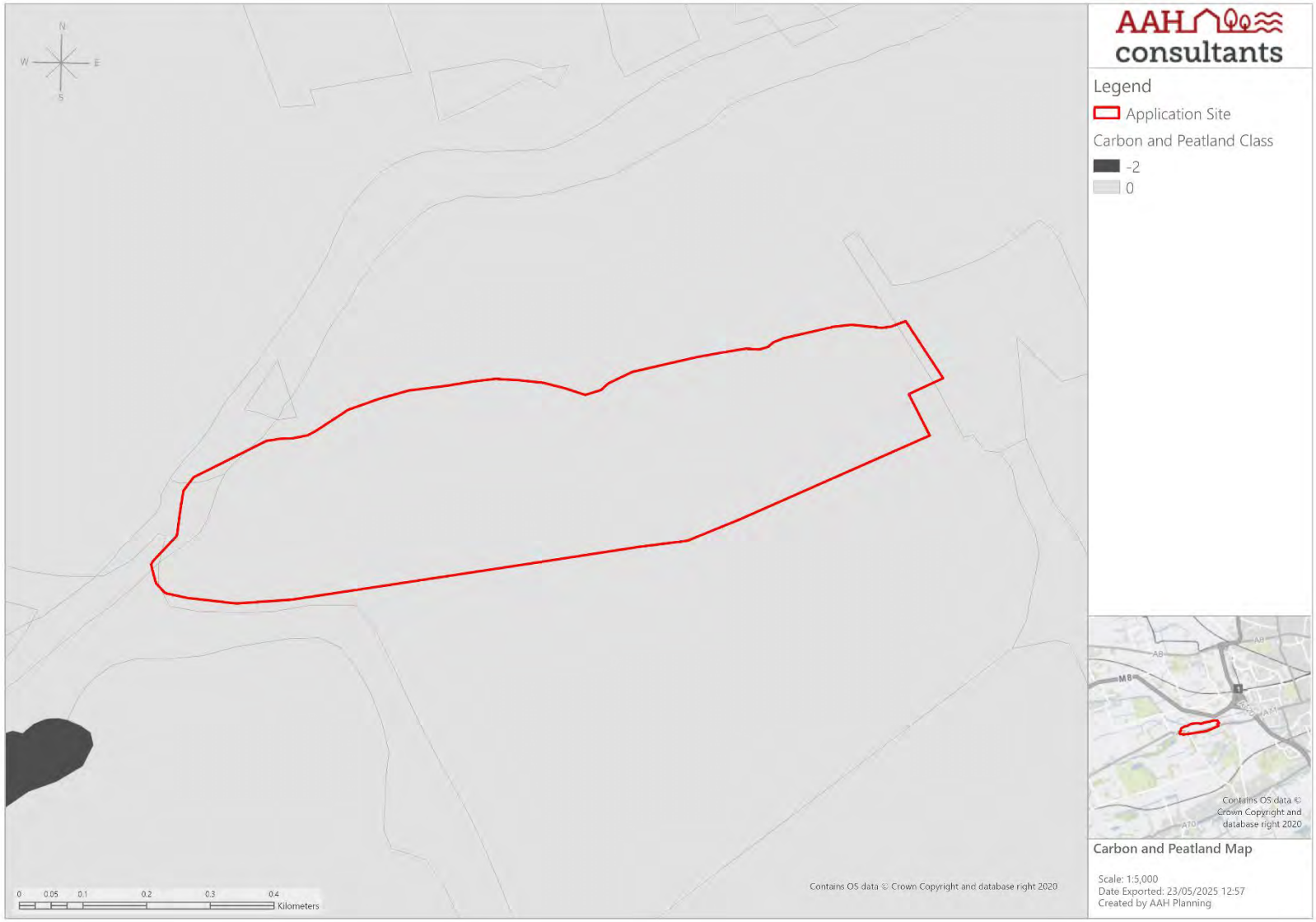
Appendix A – Site Location Map

Appendix B – Green Belt Map

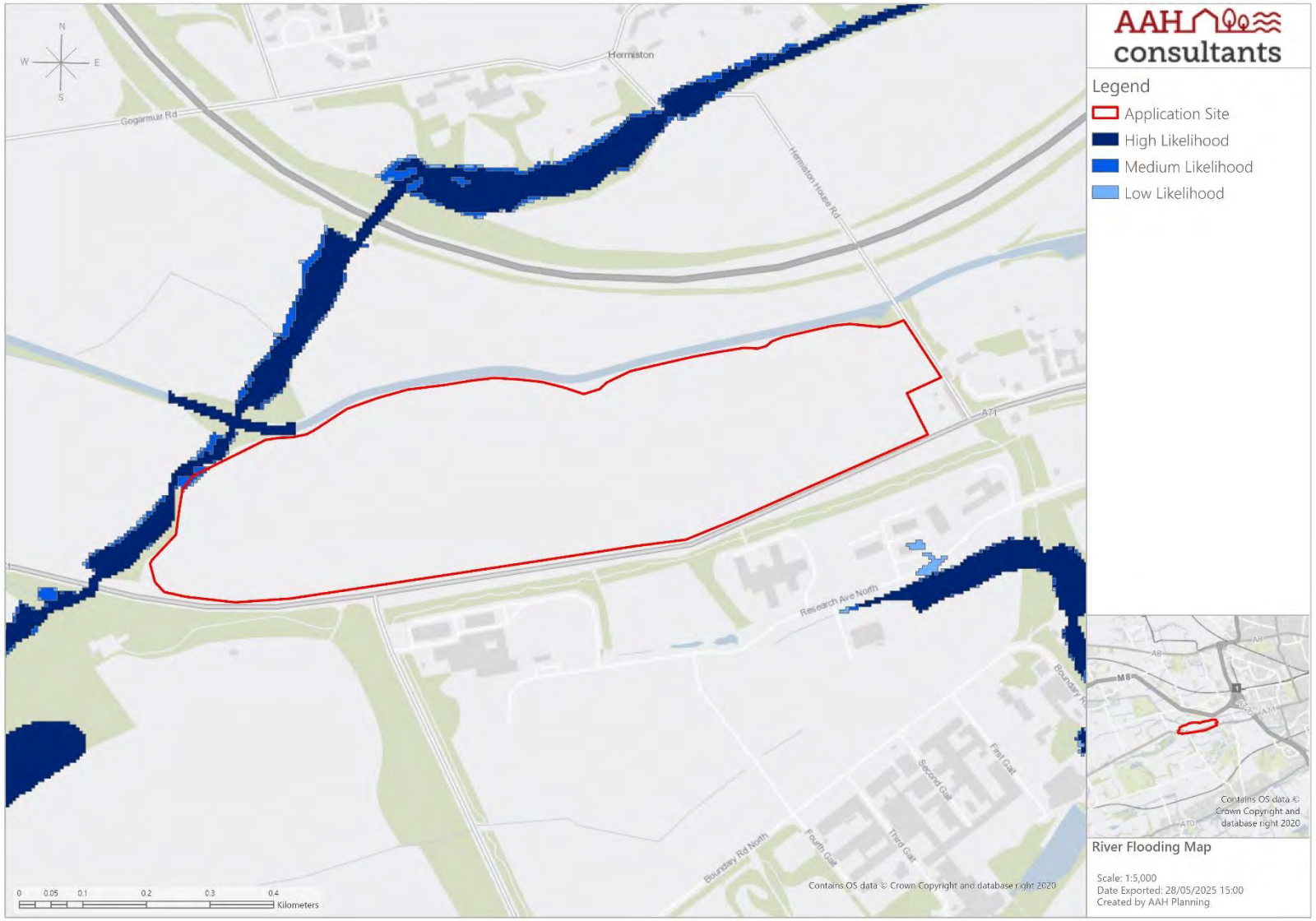
Appendix C – Agricultural Land Classification Map



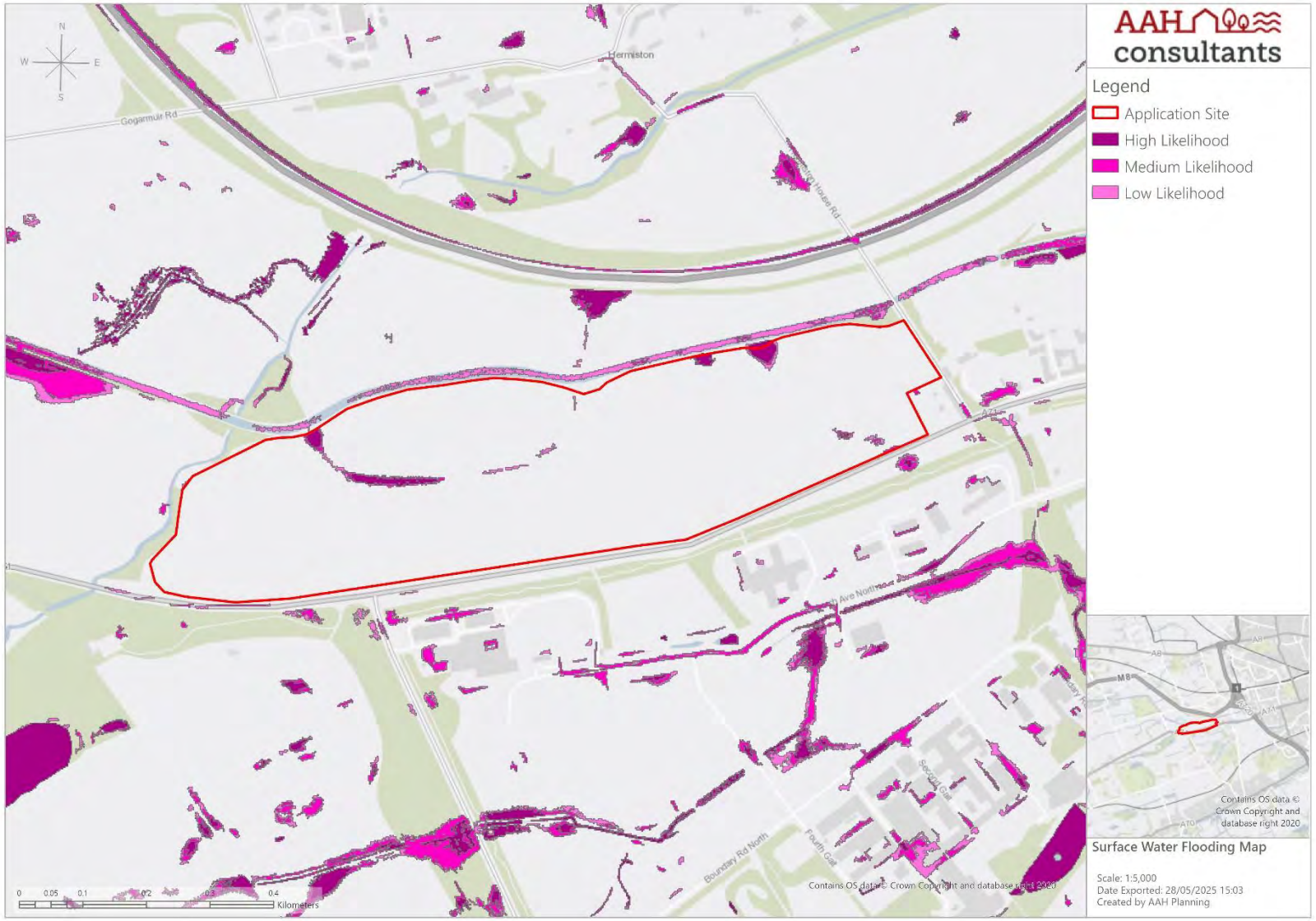
Appendix D – Carbon and Peatland Map



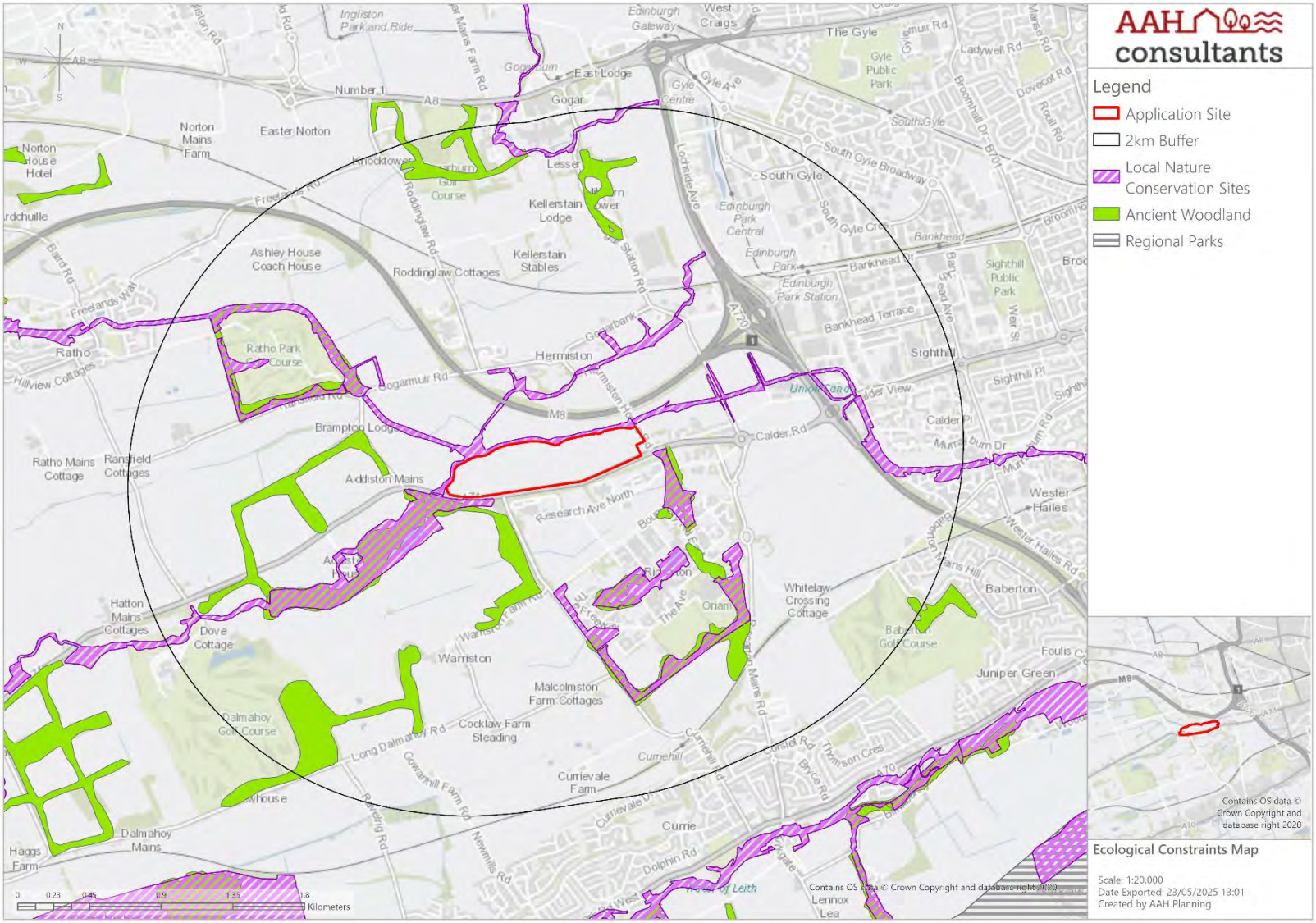
Appendix E – River Flood Risk Map



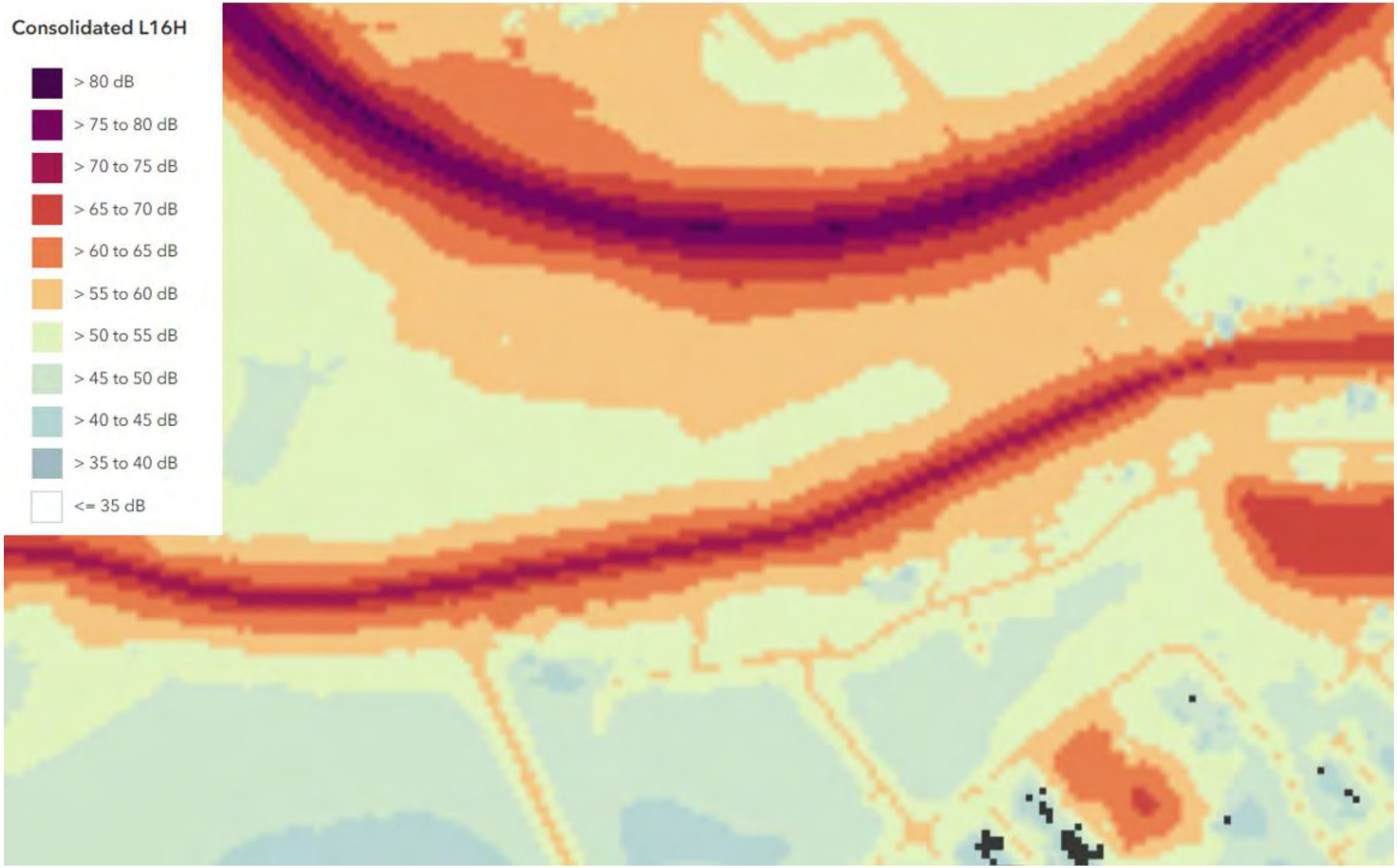
Appendix F – Surface Water Flood Risk Map



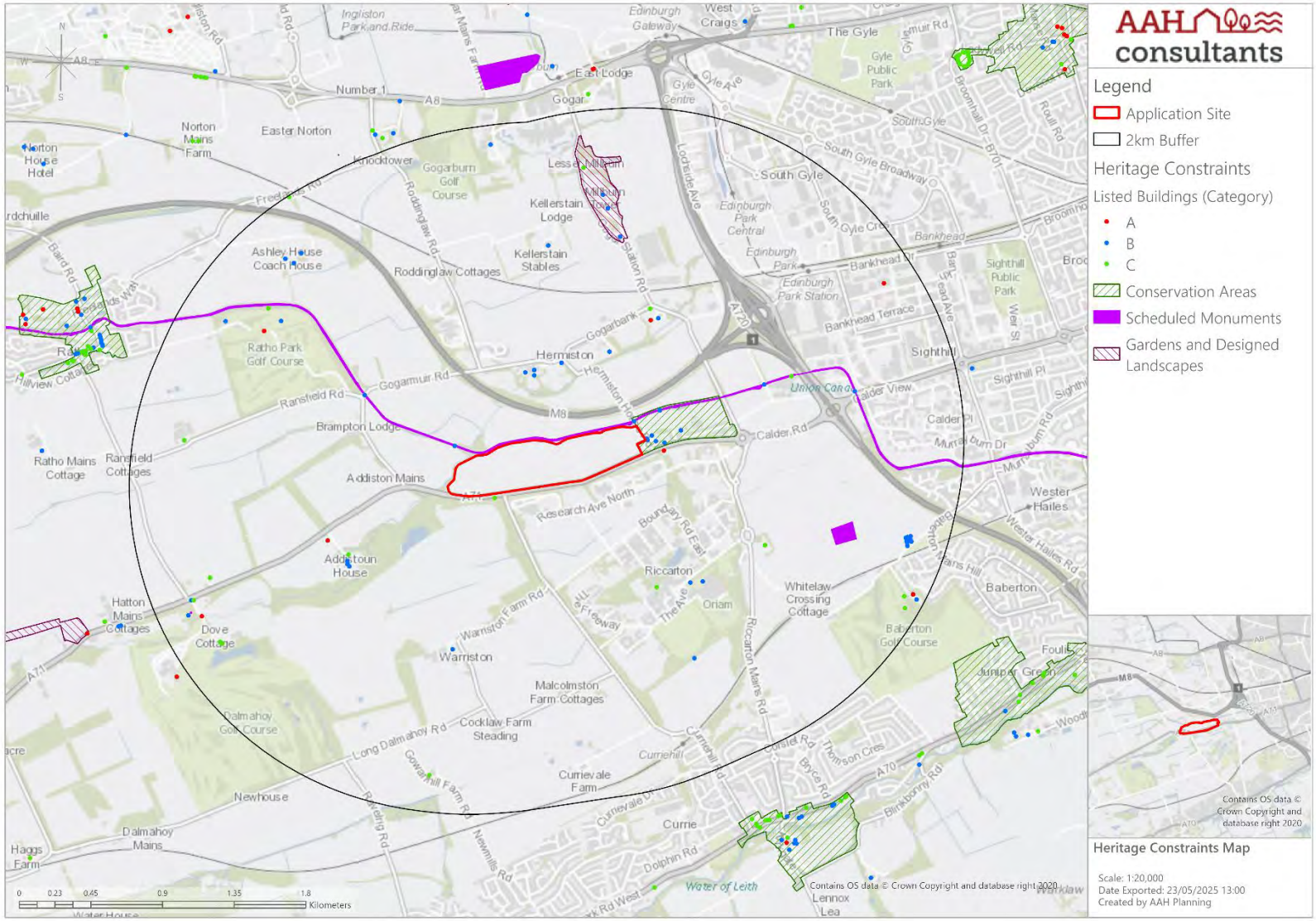
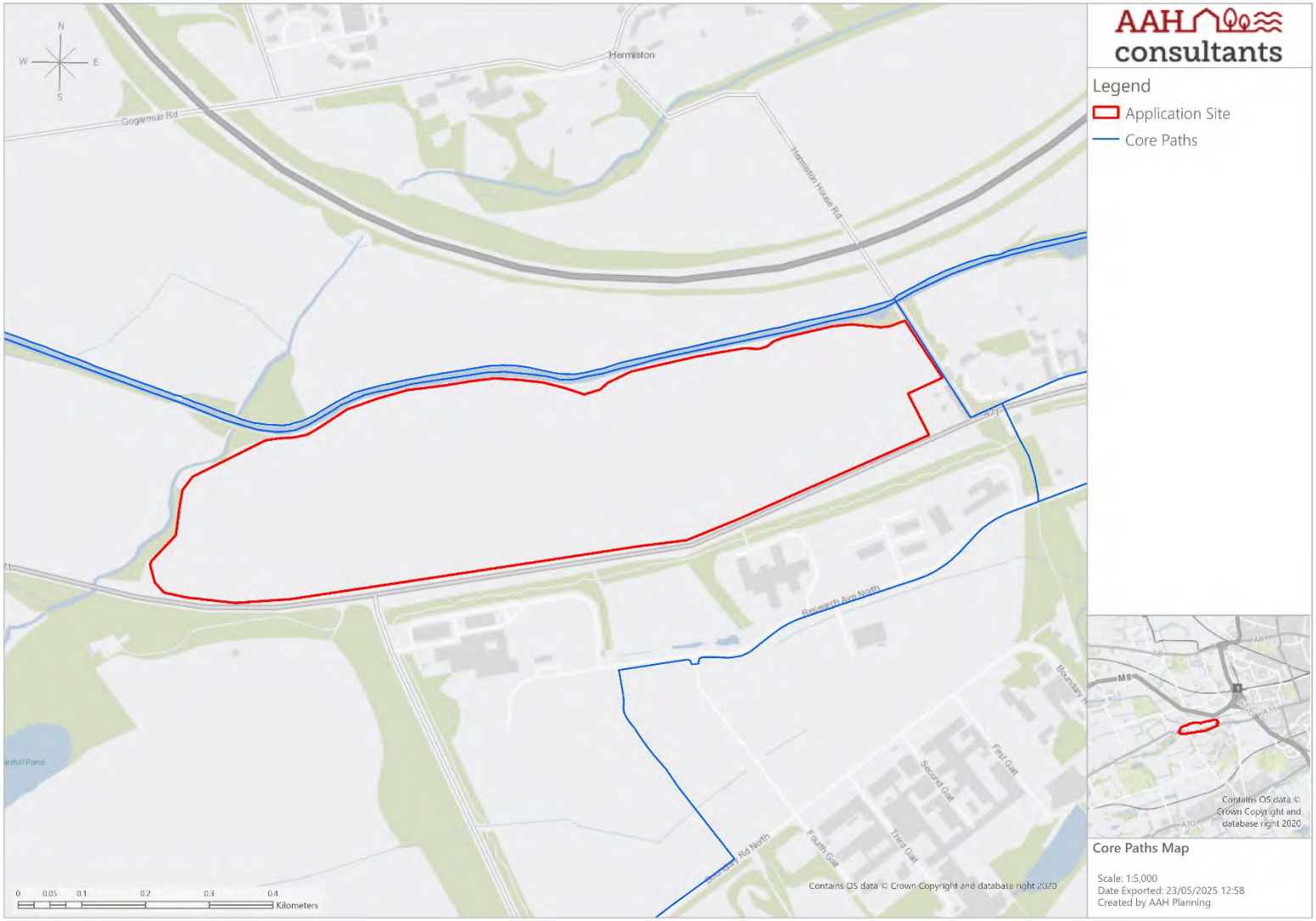
Appendix G – Ecological Constraints Map



Appendix H – Map extract showing the consolidated noise levels retrieved 23rd May 2025 from Scotland's Noise



Appendix I – Heritage Constraints Map



Appendix J – Core Paths Map