Quod

Manor Farm

Revised Planning Statement

MARCH 2025

Q230369

Contents

1 Introduction

1.1 This Revised Planning Statement ("the Statement") has been prepared by Quod on behalf of Manor Farm Propco Limited (hereafter referred to as "the Applicant") to accompany a full planning application in respect of a data centre and battery energy storage system development at Manor Farm, Poyle Road, Slough ("the Site").

1.2 The description of development is as follows:

"Demolition of existing buildings and redevelopment to comprise a Data Centre (Use Class B8) and Battery Energy Storage System with ancillary substation, offices, associated plant, emergency backup generators and associated fuel storage, landscaping, sustainable drainage systems, car and cycle parking, and new and amended vehicular and emergency access from Poyle Road and other associated works."

1.3 The full planning application was submitted to Slough Borough Council (hereafter referred to as 'SBC' or 'the Council') on 13 December 2024 and validated on 2 January 2025 with reference number P/10076/013.

1.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires development proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.

1.5 The Statement reviews the planning application proposals in light of the Development Plan, having regard to relevant material considerations, including national planning policy and guidance. In recognising the Green Belt location of the Site, the Statement identifies the harm arising to the Green Belt and other harms as a result of the development, which is assessed against the clear and demonstrable benefits of the proposals.

1.6 For the reasons set out in this Statement, the identified harms are clearly outweighed by the benefits of the development which is sufficient to constitute very special circumstances to allow planning permission to be granted.

1.7 In addition to this Planning Statement, the planning application is supported by the following documentation:

Document	Author
Application Forms	Quod
Plans and Drawings	Corgan
Air Quality Assessment	AQC

Alternative Site Assessment	Colliers
Arboricultural Impact Assessment	Tyler Grange
Archaeological Impact Assessment	RPS
Aviation Safeguarding Assessment	K L Grant Consulting
Outline Construction Environment Management Plan	Ramboll
Design and Access Statement	Corgan
Flood Risk Assessment and Drainage Strategy	Price and Myers
Ecological Impact Assessment	Tyler Grange
Economic Statement	Quod
Energy and Sustainability Statement	Hoare Lea
Fire Strategy	Hoare Lea
Generic Quantitative Risk Assessment	Ramboll
Green Belt Assessment	Bryant Associates
Heritage Impact Assessment	RPS
Landscape and Visual Impact Assessment	Bryant Associates
Noise Assessment	Sharps Redmore
Phase 1 Preliminary Risk Assessment	Ramboll
Outline Remediation Strategy	Ramboll
Statement of Community Involvement	The Communication Group

Shadow Habitat Regulation Assessment	Tyler Grange
Security Design Statement	Hoare Lea
Transport Assessment	SLR
Travel Plan	SLR
Utility Assessment	Hoare Lea

1.8 This Statement is structured to cover the following sections:

- **Section 2 – Factual Background** confirms the relevant context of the Site, including a description of the Site and surrounding area, and confirmation of the relevant planning history.
- **Section 3 – Pre-Application Engagement** details the engagement that has occurred prior to the submission of this planning application, including liaison with Slough Borough Council ("SBC") and the surrounding local community.
- **Section 4 – Development Proposals** describes the application proposals for which planning permission is sought.
- **Section 5 – Planning Policy and Guidance** summarises the Development Plan and relevant national policy, identifying the relevant planning policy context and material considerations.
- **Section 6 – Assessment of Need** details the need that would be met by the development proposals.
- **Section 7 – Planning Considerations** provides an assessment of the proposed development against the relevant policies of the Development Plan having regard to relevant material considerations (including supporting guidance where appropriate).
- **Section 8 - Very Special Circumstances Case** sets out how the development proposals demonstrate Very Special Circumstances to justify development within the Green Belt.
- **Section 9 - Conclusion** provides a summary of the justification for granting planning permission for the application proposals.

2 Factual Background

2.1 This section of the Planning Statement summarises the relevant factual background applicable to the Site, including a description of the Site and its surrounding context, and an explanation of the relevant planning history.

Site and Surrounding Context

2.2 The Site is located in the Borough of Slough, to the west of Heathrow Airport outside of the M25. The Site extends to approximately 8.6ha in total and is comprised of Green Belt land. The Site is bounded by Poyle Road to the east, Poyle Channel and Hilton Hotel to the north and a mature tree belt to the south. The west of the Site is characterised by open fields and the Queen Mother Reservoir beyond. The Britannia Industrial Estate is located to the east of the Site which forms the industrial landscape of the area. The Site falls within a Strategic Gap and the Colne Valley Regional Park.

2.3 The Site is made up of two parcels connected by an internal access road, as per Figure 1 below.

2.4 The northern parcel, referred to as Parcel A, is previously developed land. Parcel A was formally used as landfill in the latter 20th Century. Currently the land is in commercial/industrial use, with areas of hardstanding used for open air storage of materials, as well as parking for coaches and commercial vehicles. Manor Farmhouse, a House of Multiple Occupancy (HMO) owned by the Applicant, is also located within Parcel A.

2.5 Parcel A is occupied by various storage, transport and light industrial uses and can be characterised as previously developed land. The parcel contains built form, including a brick building at the entrance from Poyle Road, storage containers and extensive areas of hard standing. There is little vegetation within the parcel, generally limited to the boundaries.

2.6 The existing operations that occur onsite have a poor-quality visual impact on the area and are accompanied by high levels of noise and dust. The on-site uses are consistent within the surrounding industrial landscape, which benefits from good access to the Strategic Road Network.

2.7 Parcel B, approximately 280m to the south, is smaller in comparison and forms a rectangular block of land bounded by Poyle Road to the east and a mature tree belt, known as Poyle Poplars to the south. Parcel B is undeveloped and arable in nature with thick hedgerow boundaries which limits views into and out of the Site. A pumping station is located at the northeast corner, accessed from Poyle Road. Parcel B is contained by mature field hedgerows to the west and is contiguous with the open land to the west - although not visually connected due to the height and maturity of the boundary hedgerows.

2.8 Both parcels are connected via an existing track east of the curtilage belonging to Poyle Farmhouse.

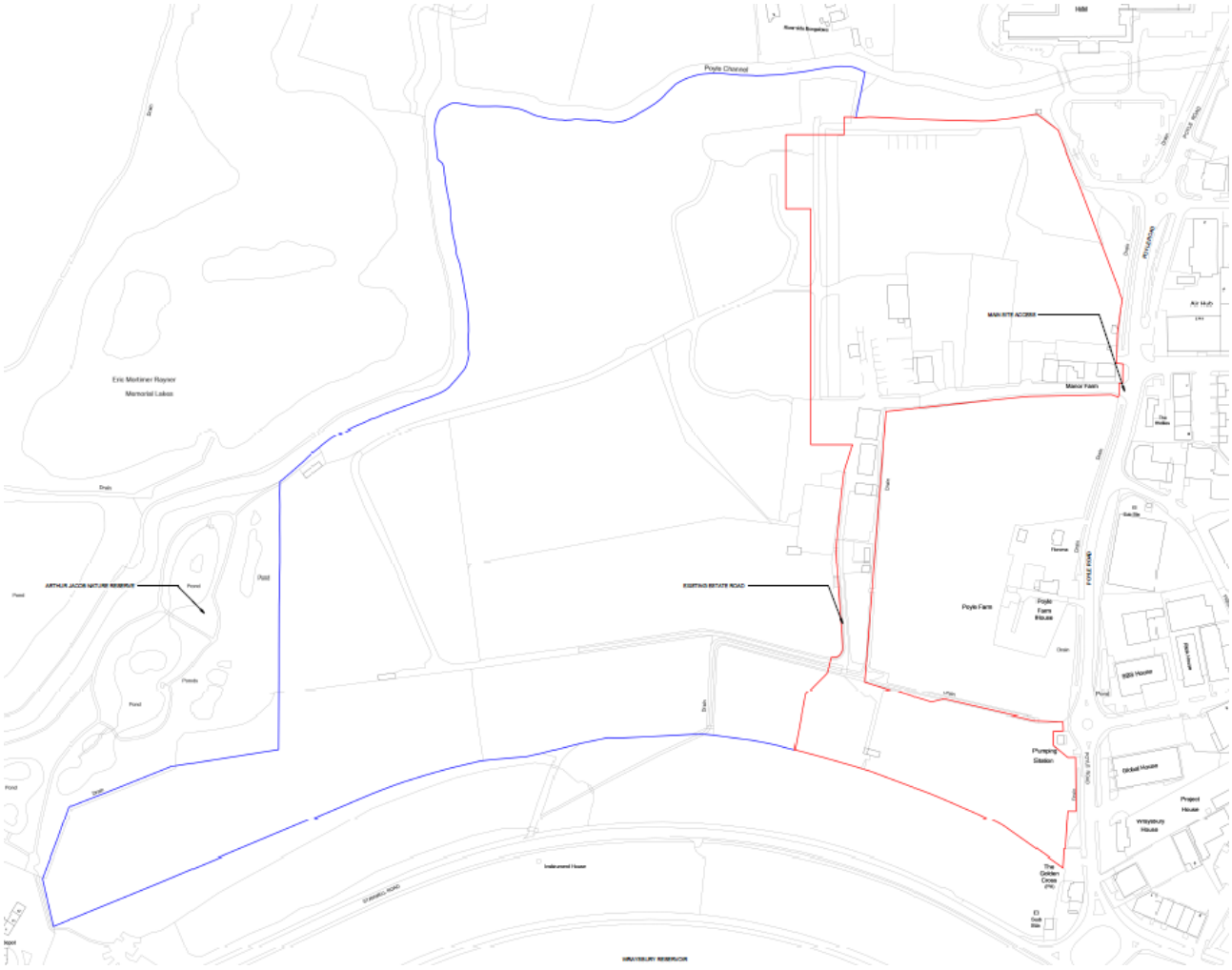

Figure 1: Site Location Plan

2.9 Parcel A is bound by Colne Brook to the north, Poyle Road to the east, and agricultural land to the south and west. The southern parcel is bound by woodland to the south, Poyle Road to the east, and agricultural land to the north and west.

2.10 The character of the surrounding area is largely commercial, with Poyle Trading Estate located on the opposite side of Poyle Road. Hilton London Heathrow Airport Hotel is located to the north of the Site. Residential uses are located in the wider area to the north and north-east. Agricultural land and the wider Colne Valley is located to the west.

2.11 The Site is in close proximity to a number of statutory designated environmental and heritage assets. Poyle Farmhouse, a Grade II Listed Building, is located to the west of Poyle Road, south of Parcel A. The Hollies, Grade II Listed Building, is located to the east of Poyle Road, opposite the existing Site Access. The Arthur Jacob Nature Reserve ("LNR") is located to the southwest. Furthermore, South West London Waterbodies Ramsar Site and Special Protection Area, and Wraysbury Reservoir Site of Special Scientific Interest ("SSSI") are located to the south of the Site. Staines Moor SSSI is located further to the south-east, adjacent to the M25.

2.12 The Site is located within Flood Zone 1 and is therefore at the lowest probability of flooding from rivers or the sea.

Planning History

2.13 The planning history for the Site is summarised in Table 1, which demonstrates that various intensive uses have previously been permitted.

2.14 In particular, the northern part of the Site represents previously developed land, which has a complex planning history associated with the following principal uses:

- Residential – Use Class C3 (residential) and C4 (house in multiple occupation) – within the former Manor Farm farmhouse and adjoining buildings.
- General industrial – Use Class B2 buildings and areas of hardstanding and open land used in connection with the processing of concrete (including concrete crushing and screening) to produce hardcore and is licensed to process 85,000 tonnes per annum and store c.80,000 cubic metres.
- Storage and distribution – Use Class B8 buildings (including ancillary offices) and areas for the open storage of non-perishable, salvaged and/or reclaimed materials arising from works undertaken as part of a demolition contractors business.
- Sui generis uses – use of land for the importation, storage and delivery/distribution of primary aggregates, and use of land for vehicle parking and storage.

2.15 Of particular significance is planning permission ref. P/10076/006 for Class B2 uses which was granted at appeal in September 2009. The planning permission allows for the use of the land for a concrete processing plant. The Planning Inspector deemed the proposals 'inappropriate development' in the Green Belt, however concluded the land was not prominent and was well contained on three sides. As a result, the Inspector concluded that the land did not perform a strong Green Belt function and that the buildings and traffic associated with the uses would have a limited impact on the openness of the Green Belt.

2.16 The Inspector noted that the Site is "*somewhat remote from Slough*" and is generally contained by development on three sides so is of "*little use in terms of objectives of the Colne Valley Park*". Similarly, the Inspector concluded that development of the Site would "*not conflict with Local Plan Policies GC1 and GC9 for the prevention of urbanisation and landscape maintenance*" as there is "*no material harm*".

2.17 Parcel B has a limited planning history, the most significant being the approval for the erection of a nine-hole golf course in 2003, which we understand was not implemented.

2.18 The following table sets out the planning history for the entirety of the red line boundary area.

SBC Application Reference	Description	Decision
P/11388/000	Erection of a nine-hole golf course, club house, storage and greenkeepers accommodation.	Approved on 5th June 2003.
P/11442/003	Change of use from agricultural land to residential caravan site	Refused on 17th October 2002
P/11442/004	Change of use from agricultural land to residential caravan site	Refused on 28th October 2004

P/10076/006	Use of land for crushing, screening and inert waste recycling (B2 Use) including retention and remodelling of existing stockpiles (limited by height and volume), creation of new access, provision of new vehicle and lorry parking and wheelwashing facilities, new plant workshop, lorry workshop, retention of existing fuel store and provision of a new fuel store, a weighbridge and office accommodation	Allowed at appeal on 21st September 2009
P/11442/008	Certificate of lawfulness of existing use and operational development of land for the retention of a group floor warehouse distribution unit with ancillary offices, showers, w/c kitchen facilities, with its respective access, parking provision and turning area	Approved on 21st August 2009
P/11442/007	Certificate of lawfulness of existing use and development for the retention of land as a car park (sui generis) for commercial purposes and the retention of associated hardstanding	Approved on 27th July 2009
P/11442/005	Certificate of lawfulness of existing use of land and single storey semi-detached building as a single, three bedroomed dwelling house with ancillary parking provision for up to three cars and amenity space	Approved on 27th July 2009
P/11442/006	Certificate of lawfulness for existing use of land and two storey detached building therein comprising 6no. single and 1no. double self-catering bed sitting rooms, communal w/cs, bath and shower rooms, laundry and ancillary space as a HMO	Approved on 27th July 2009

Table 1: Planning History of the Site

2.19 In terms of the surrounding area, the land immediately to the east has been actively developed as part of the Poyle Trading Estate.

2.20 In respect of land to the north, in 2004 an appeal was allowed for a data centre at the now Hilton London Heathrow Airport Hotel site. Following a call-in, the Secretary of State granted planning permission for the construction of a data centre in the Green Belt agreeing that very special circumstances existed to justify the development.

2.21 It was concluded that although the proposed building would reduce the openness of the Green Belt, it did not lie in the open countryside and the character of the surrounding area was strongly influenced by the proximity of a large industrial estate and main roads. The decision noted the poor quality of the Green Belt land in question, that the site was not located within the open countryside and the economic benefits of the data centre to meet the requirement for telecommunications storage. The Secretary of State noted that the appearance of the data centre "*would not be unlike those of other modern commercial buildings as seen in the nearby business park*". The Secretary of State concluded that the proposed "*mitigation measures such as new planting and well landscaped grounds*" would result in any harm to the Green Belt being limited.

Summary

2.22 The Site is located off Poyle Road, immediately adjacent to Poyle Trading Estate. The Site is located within the Green Belt, but the northern portion represents previously developed land

which has secured numerous permissions for intensive commercial and industrial activities. The southern portion of the Site is undeveloped land, with strong boundaries, resulting in the land being well contained, with limited wider inter-visibility.

2.23 The poor-quality nature of the Green Belt on Site and the surrounding area has been recognised in multiple appeal decisions.

3 Pre-Application Engagement

3.1 Prior to the submission of this application, the Applicant has undertaken proactive and extensive pre-application engagement with the Local Planning Authority, Members and the Local Community.

3.2 The main pre-application engagement that has occurred is as follows:

- April 2024 - Pre-Application Meeting with SBC Planning and Highways
- September 2024 – Pre-Application Meeting with SBC Planning and Highways
- September 2024 – Pre-Application Meeting with SBC Highways Officers
- November 2024 – Public Exhibition

3.3 The principle of the development was discussed at the first pre-application meeting in April 2024. During the meeting the Applicant's team described the emerging proposals, as they were at that point, and explained the ongoing work that was being undertaken to refine the design and commence assessment documentation.

3.4 Officers requested further details before commenting on the emerging proposals. This included more information on the height of the proposed buildings, the potential scale of harm to the Green Belt, the availability of alternative sites and details of the economic benefits expected from the development.

3.5 A follow up pre-application meeting was held with SBC planning and highways officers in September 2024. To ensure sufficient information was available to SBC officers, the Applicant commissioned a series of assessments/documents, including:

- Pre-Application Planning Statement
- Pre-Application Design Statement
- Draft plans including Site Location Plan and Proposed Site Plan
- Strategic Landscape Masterplan
- Economic Outputs Statement
- Alternative Site Assessment Scope
- Baseline Green Belt Appraisal
- Baseline Landscape Visual Impact Assessment
- Transport Scoping Note

3.6 The pre-application meeting provided useful feedback, including:

- With reference to the submitted material, the Applicant noted that based on the then NPPF the development was 'inappropriate' and by definition harmful to the Green Belt. The Applicant explained the tests set out in NPPF para 153 ie one needed to understand the value of the existing Green Belt against the defined purposes, the harm arising to the Green Belt (and any other harm) as a result of the development, and then assess

whether very special circumstances existed to outweigh that harm. The Applicant explained that in this instance the value of the existing Green Belt land was low, in part due to the existing industrial uses on Site – which was fully evidenced in the Green Belt baseline work that had been submitted with the pre-application pack, and reinforced through appeal decisions in respect of Parcel A and land immediately to the north.

- Given the low value of the existing Green Belt land, the Applicant explained why the proposed development would result in limited overall harm to Green Belt purposes and openness, with reference to the submitted LVIA baseline work.
- The Applicant explained the urgent need for the proposed nationally important infrastructure, the significant economic benefits that arise, the absence of alternative sites, the reduction in transport movements, and the environmental and landscape benefits that would act as compelling very special circumstances to more than outweigh the limited Green Belt harm.
- In the context of the then emerging revisions to the NPPF, the Applicant explained that the effect of proposed revisions to para 152 would be that the proposed development would be classed as 'appropriate' development (rather than 'inappropriate' development) as it:
    - utilised grey belt land (ie previously development land or Green Belt with limited value)
    - there was a demonstrable local and national need for the development; and
    - delivered improvements to existing green spaces (as per para 155)
- On this basis, the then emerging revisions to the NPPF would not require very special circumstances to be demonstrated.
- The Applicant concluded that regardless of whether the then current or then emerging revisions of the NPPF were applied – there was a compelling case to grant planning permission. Officers noted the Applicant's position but reserved full judgement at that stage.
- In the context of the above explanation, and assuming the then current NPPF, the Applicant engaged in a discussion with the Council on the very special circumstances case set out in the submitted pre-application material.
- Officers noted the stated economic benefits outlined. Officers were keen to understand the scale of economic benefits and how these would be felt at a local level, including tangible benefits such as number of jobs.
- The design and configuration of the data centre was discussed, with officers suggesting the building be rotated such that the entrance presented itself on the approach into the Site from Poyle Road. Officers noted that the height/massing seemed appropriate in the context of the 2004 data centre decision on land to the north. Officers noted the building height may have some impact on the openness of the Green Belt, which would need to be assessed having regard to the extent of existing vegetation and limited views from the west.

- Officers suggested that the Applicant consider views and setting of Windsor Castle and the Great Park, and if necessary this should be covered in the Heritage Impact Assessment submitted with the planning application.
- Officers suggested that the Applicant engage with Colne Valley Regional Park to establish if there are landscape initiatives that could be supported/enhanced as a result of the application proposals.
- Officers requested that car parking provision be considered in light of published standards and having regard to proposed job numbers.
- Transport officers provided initial views including the desire for improved pedestrian crossings linking to existing bus stops; improved footways around adjacent bus stops; and the inclusion of an island to reduce risk of right turn movements at the main vehicular access. It was agreed that a separate meeting would be arranged to allow these matters to be discussed in detail.

3.7 A subsequent Highway specific meeting was held with SBC officers in September 2024. Key topics of discussion and feedback received included:

- Access arrangements – SBC reiterated the request for further measures to enforce the proposed left in, left out junction. Detail of emergency access to be provided as part of the planning application. HGV vehicle tracking to be undertaken to review the potential introduction of a splitter island to ensure access arrangements are suitable.
- Proposed improvements to footways, crossing points and bus stop infrastructure near the Site to ensure future users will be able to access the Site using sustainable transport modes.
- Available TRICS data is for data centres much smaller than the application proposals (largest data centre on TRICS is 16,000sqm). It was agreed that a comparison could be made to understand staff numbers by an increase in line with floor area.
- Sufficient parking should be provided for use, noting not too high a provision due to Green Belt impact and the desire to avoid unnecessary parking.

3.8 The submitted Transport Assessment and access arrangements have been carefully informed by the pre-application feedback from officers.

3.9 The Applicant has undertaken extensive pre-application engagement with Council Officers, Local Members and residents, which has been reflected in the final proposals that form this application submission.

3.10 The Applicant held a public consultation event on 6 November 2024 in St Thomas' Church in Colnbrook. The event was attended by 14 members of the public, in addition to the current tenants of Manor Farm. Attendees were encouraged to leave feedback forms, and the following key themes were identified:

- Tenants' concerns on project timings and delivery regarding time to vacate;
- S106 obligations and contributions;
- Traffic and reduction in HGVs on local roads; and
- Visual impact and noise.

3.11 In addition, other stakeholders have been consulted as part of the pre-application engagement. This included local councillors, the neighbouring hotel and representatives of the Colne Valley Regional Park.

3.12 Two briefing meetings were undertaken with Colnbrook and Poyle Councillors, which identified the desire for a new footpath that would enable residents of Colnbrook and Poyle Villages to access the Arthur Jacob Nature Reserve acting as a public benefit of the scheme. The application proposals have been developed to enable the delivery of a public footpath that connects Parcel A with the Nature Reserve.

3.13 The neighbouring Heathrow Hilton Hotel raised concerns of the visual impact on guests entering and leaving the hotel and the potential impact on the view from guest rooms. The position of the data centre has been reviewed in light of these comments, and the Applicant has ensured that there is a sufficient buffer to the eastern and northern boundaries, allowing for new landscaping to assist in screening views.

3.14 In addition, the Applicant engaged with Groundwork South on behalf of the Colne Valley Regional Park confirming the development proposals could offer opportunity for green infrastructure and landscape recovery. As a result, advice was provided setting out the potential enhancement measures that could be incorporated into the development proposals. This included improvements to, and additions of, the pathway network in and around Poyle and Colnbrook to improve public access to the Arthur Jacob Nature Reserve and River Habitat. Their advice very much aligns to the engagement with the local council officers. This informed the final designs now proposed including the on-site landscaping scheme, and on and off site pedestrian and cycle connectivity.

3.15 Overall, the above process demonstrates the active engagement the Applicant has undertaken with the Council, local residents and key stakeholder consistent with the then adopted NPPF Paragraphs 39 – 46. Feedback, including from the public consultation, has been considered and reflected through the evolved development proposals where appropriate. This is discussed in further detail in the accompanying Design and Access Statement and Statement of Community Involvement.

4 Development Proposals

4.1 The planning application seeks permission for a hyperscale data centre on the northern parcel of the Site and battery energy storage system ("BESS") on the southern parcel, with associated infrastructure and works.

4.2 The formal description of development is as follows:

"Demolition of existing buildings and redevelopment to comprise a Data Centre (Use Class B8) and Battery Energy Storage System with ancillary sub station, offices, associated plant, emergency backup generators and associated fuel storage, landscaping, sustainable drainage systems, car and cycle parking, and new and amended vehicular and emergency access from Poyle Road and other associated works."

4.3 The scheme design is described in full in the supporting Design & Access Statement, however, a brief overview is provided below.

4.4 The total site area is c.8.15 hectares.

4.5 The data centre is located in Parcel A and is split across 3 levels, and includes associated car parking, gantry and substation. The building, including the data halls and office, extends to a gross internal area of c.13,533qm, with a parapet height of 23 metres and maximum screen height of 30 metres, which is required to support the equipment contained within both the building and service equipment at roof level. Ancillary infrastructure and buildings associated with the data centre include a substation and the gate house (c.37sqm GIA).

4.6 The key components of the data centre element of the Site are as follows:

- Office Building - Situated at the southeast corner of the data centre is the three-storey office element. The ground and first floor connect internally with the data halls, resulting in floor-to-floor heights of 7 metres. To reduce building bulk, the second-floor height is reduced to 5.5 metres. At roof level, a recessed and screened plant room is set back from the cornice to minimise visibility from the site entrance and Poyle Road.
- Data Halls - The three-story data centre is screened by the office element which is designed to appear as an independent structure, with a single access. The configuration of the data halls is symmetrical layout to enhance efficiency. The position of the projected cores helps to break down the massing of the building, with a stepped composition in both east and west elevations. The roof-mounted cooling equipment is recessed from the main cornice to reduce visual impact and consolidate it as a separate crown massing.
- Loading Bay - Integrated within the ground floor of the office building at its western end, the loading bay shields maintenance activities from the site entrance and parking area.
- Generator Gantry - The generator units are located in a 3-storey gantry structure, with the massing expressed as a separate, lower-height volume than the data centre, contributing to a balanced massing composition.
- Substation - Located at the southwestern edge of Parcel A, the substation is an independently fenced facility, screened from the carpark and main access points.

- Fuel Storage - Located to the western elevation of the building, the fuel store serves the data centre backup generators. It consists of six cylindrical tanks, which are less than half the building height, with associated pump package housings. Further design details of the fuel store are included within planning submission.
- Access and Parking – A one-way access road is proposed around the periphery of the data centre to limit hard standing and maintain a steady flow of vehicle movement. The car parking is positioned away from Poyle Road to maintain the green buffer, the parking area minimises visual impact on the surroundings.

4.7 The development proposals include the following improvements to the existing main access junction into Parcel A:

- The main access will be modified to be a left-in/left-out arrangement which will reduce the number of conflicting turning movements compared to the existing arrangement;
- Inclusion of an island at the main site access to separate inbound and outbound vehicles, which also prevents outbound vehicles turning right;
- Proposed signage indicating no-right turn for vehicles arriving from the north. Vehicles will travel 285m to the roundabout to the south, before returning northbound along Poyle Road to enter the site;
- Left and right hand visibility shown at 2.4m x 43m as per Manual for Streets for a 30mph speed road;
- The downgrading of the existing secondary access to the north to a pedestrian / cycle route; and
- Swept path analysis to demonstrate that the junction has been designed to allow for the safe manoeuvre of HGVs.

4.8 These improvements works all fall within existing highways land off Poyle Road and therefore will be delivered via a Section 278 agreement.

4.9 Parcel B contains the BESS. The design utilises a strip of land which is well screened on all sides and is sufficiently sized to accommodate the supporting infrastructure. The key element of the BESS includes a number of lithium-ion batteries to store electricity for release to the grid.

4.10 Given the nature of the operation, the BESS has infrequent access and maintenance requirements. The BESS will connect to Parcel A's main access via a link road, serving as the primary point of entry. This represents an upgrade to the existing track currently on-site.

4.11 An emergency access to Parcel B is provided onto Poyle Road via an existing vehicle crossover which forms part of the Poyle Road / Blackthorne Road roundabout. This access is gated and is suitable for a fire tender.

4.12 As described above, the existing secondary access to Parcel A off Poyle Road is to be repurposed as a dedicated pedestrian/cycle route that connects to an on-site path, which runs to the north and will connect to a new path to Arthur Jacobs Nature Reserve on land in the Applicant’s control.

4.13 Additionally, access enhancements are proposed to two nearby bus stops, to the north of the site access, via new 2m wide footways along the western side of Poyle Road, which will improve pedestrian access and safety. A new pedestrian crossing is also proposed immediately south of the Site access.

4.14 These off-site works fall within highways land and will be delivered via Section 278 agreement.

4.15 The application proposals deliver significant landscape improvements to the Site. The vision for the landscape proposals is to provide a successful landscaped environment which respects the existing character, supports the biodiversity of the spaces and provides a pleasant space for users.

4.16 The key landscape principles are as follows:

- To create a high-quality environment with an attractive green outlook.
- Retain and enhance the natural environment, supporting the existing local landscape character.
- Protect, create and support habitats for biodiversity, allowing species to survive and thrive.
- On-site landscape treatments enhancing the wider green belt context.

4.17 The character of the proposed green infrastructure will be broadly informal and naturalistic, to respond to the existing landscape character. This will be implemented through the use of native / semi-native plant species. Fronting the main entrance to the building and the car park, landscaping will take on a semi formal/formal character, defining the destination space and reflecting the form of the building.

4.18 The landscape enhancements will provide benefits to both the landscape character and ecology. This will include providing new habitats and expanding those already existing on site, such as planting new tree groups, shrub areas, long grass and wildflower meadows which results in a biodiversity net gain significantly in excess of 10%.

5 Planning Policy and Guidance

5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications are determined in accordance with the development plan unless material considerations indicate otherwise.

5.2 The Development Plan applicable to the Site comprises the following documents:

- Saved Policies of the Slough Local Plan (March 2004);
- Core Strategy DPD (December 2008);
- Site Allocation DPD (November 2010);
- Slough Local Development Framework (LDF) Proposals Map (November 2010);
- Waste Local Plan for Berkshire (December 1998); and
- Berkshire Joint Minerals Local Plan 2001.

5.3 Material considerations of relevance to the proposals include the National Planning Policy Framework ("NPPF"), the Planning Practice Guidance, and Slough's evidence base reports commissioned in connection with the emerging replacement Local Plan.

5.4 The Council had been progressing a revised Local Plan, however, the process is currently paused. The latest stage was the preparation of a Spatial Strategy Consultation, which took place from 9 November 2020 to 11 January 2021.

Development Plan

Site Designations

5.5 The Slough LDF Proposals Map (2010) identifies that the Site is subject to the following policy designations:

- Metropolitan Green Belt (Policy CP2)
- Strategic Gap (Policy CG9)
- Colne Valley Regional Park (Policy CG1)
- Area Liable to Flooding (Policy CP8)
- Public Safety Zone (CG10)

5.6 It should be noted that, whilst the Local Plan identifies the Site as an area liable to flooding, the updated Environment Agency Flood Risk Mapping identifies the Site to be predominantly located within Flood Zone 1, i.e. at the lowest risk from flooding from rivers and the sea, as demonstrated at Figure 2 below.

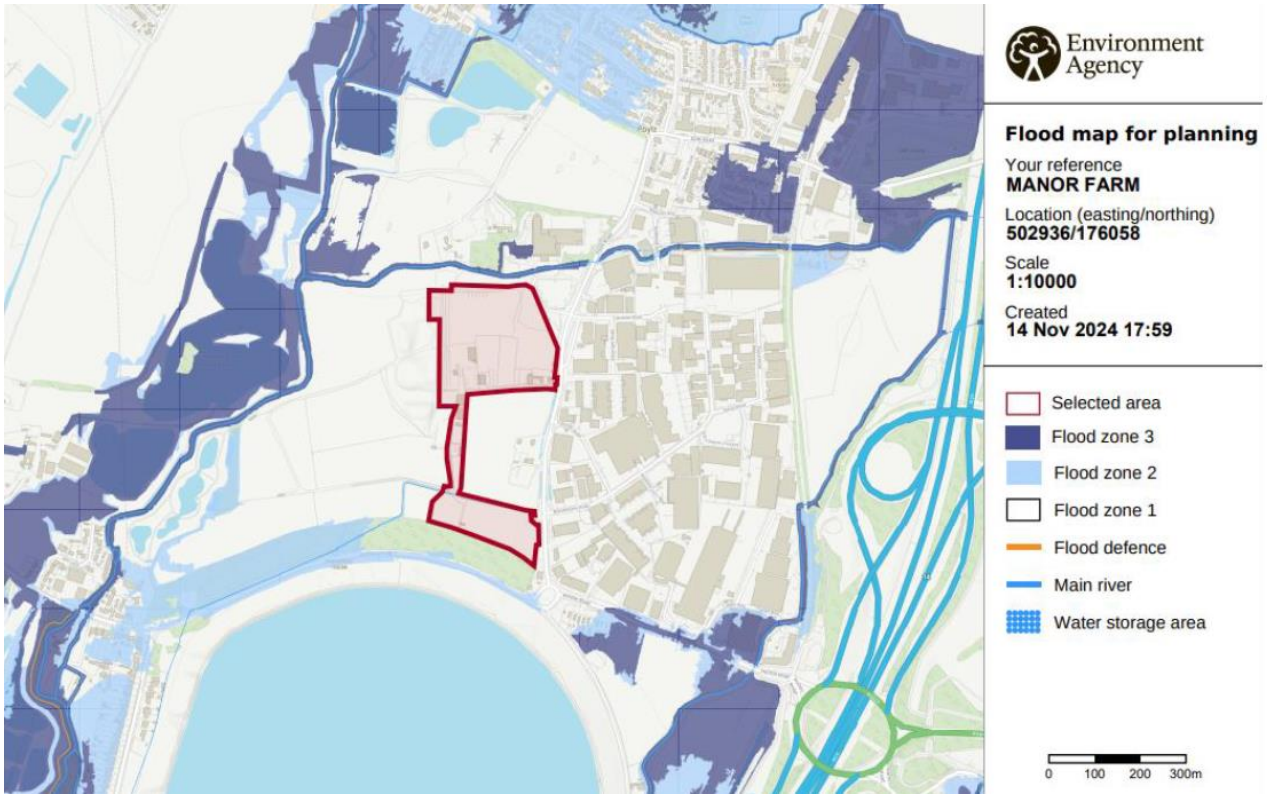

Figure 2: Environment Agency Flood Risk Mapping

5.7 Similarly, Heathrow Airport's Public Safety Zone ("PSZ") has been updated since the adoption of the Local Plan Proposals Map. Heathrow's PSZ Map confirms that the Site is not located within a PSZ.

Saved Policies of the Slough Local Plan (March 2004)

5.8 Saved Local Plan Policy CG9 (Strategic Gap) confirms that any proposals which threaten the clear separation or the role of open land within the strategic gap will not be permitted.

5.9 Saved Policy EMP4 (Development Outside of the Existing Building Areas) states that business developments outside of the Existing Building Areas, which the Site falls outside off, will not be permitted unless it can be demonstrated that the following criteria can be met:

"a) the site is not suitable for residential development;

b) there is no suitable alternative site available within the existing business areas or the town centre;

c) the proposed development is well served by public transport;

d) it would not harm the character or amenity of adjoining areas; and

e) the traffic from the proposed development can be accommodated upon the road network."

5.10 Saved Policy CG1 (Colne Valley Park) sets out that proposals for development within the countryside or other open areas in Colne Valley Park will not be permitted unless they:

"Maintain and enhance the landscape and waterscape of the park in terms of its scenic and conservation value and its overall amenity;

Resist urbanisation of existing areas of countryside;

Conserve the nature conservation resource of the park; and

Provide opportunities for countryside recreation which do not compromise the above."

5.11 Where development is permitted in these areas, the Policy requires measures to mitigate any visual impact and/or enhance nature conservation and/or provision of new or improved access to the countryside will be sought by agreement and/or condition.

Core Strategy DPD (December 2008)

5.12 The Core Strategy DPD contains the spatial vision, objectives and strategic policy for the Borough. It includes policies to guide development, as well as protect the natural and historic environment.

5.13 Core Policy 1 (Spatial Strategy) sets out all development will take place within the built-up area, predominantly on previously developed land, unless there are very special circumstances that would justify the use of Green Belt land. The policy also requires that a strategic gap be maintained between Slough and Greater London.

5.14 Core Policy 2 (Green Belt and Open Spaces) confirms that the existing areas of Metropolitan Green Belt are to be maintained and notes that development will only be permitted in the Strategic Gap and the open areas of the Colne Valley Park if it is essential to be in that location.

5.15 Core Policy 5 (Employment) states that major warehousing developments will be located in the eastern part of the Borough and in the Existing Business Areas that have good access to the strategic road and rail network.

The Waste Local Plan for Berkshire (December 1998)

5.16 'Saved' Policies from the Waste Local Plan for Berkshire 1998 continue to apply in accordance with the NPPF (2024).

Material Considerations

Emerging Local Plan

5.17 SBC have been working on a new Local Plan for Slough to cover the period from 2016 – 2036. Upon its adoption, the Local Plan will replace the existing Core Strategy, Site Allocations and Local Plan Saved Policies.

5.18 The latest stage in its preparation was the Regulation 18 consultation on the proposed spatial strategy, which took plan in November 2020 to January 2021. The timetable for the Local Plan is currently uncertain, with the latest LDS being out of date. The new Labour Government's changes to the planning system are likely to intensify the delay to the Local Plan.

5.19 The Regulation 18 Proposed Spatial Strategy marked a departure from early spatial strategy documents (notably the Emerging Spatial Strategy in Dec 2018), as it assumed no expansion of Heathrow Airport in the short to medium term.

5.20 The Site was previously earmarked by SBC for release from the Green Belt for airport-related employment uses. In view of the delay in Heathrow expansion plans, SBC set out in the Regulation 18 document that the spatial strategy does not have to plan to accommodate a third runway and that any future proposals for expansion can be considered in a review of the Local Plan at that time.

National Planning Policy Framework (2024)

5.21 The NPPF (December 2024) sets out the Government's planning policies for England and how these are expected to be applied.

5.22 Paragraph 8 underpins the entirely of the Framework by setting out the three overarching objectives that need to be mutually pursued in order to achieve sustainable development. In particular, clause 8a sets out the need to *"build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure".*

5.23 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay. Paragraph 11 Part D states that where there are no relevant development plan policies, or they are out-of-date, permission should be granted unless there is a strong reason for refusal as set out in the NPPF or adverse impacts would significantly and demonstrably outweigh the benefits. The deletion of "clear" reasons and replacement with "strong" reasons for refusal is a significant and impactful change to the NPPF that tilts the planning balance further in favour of the grant of planning permission and raises the bar for refusals which now require even more robust justification.

5.24 Paragraph 85 sets out that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It confirms that "*significant weight*" should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

5.25 Paragraph 87a states that planning decisions should recognise and address specific locational requirements of different sectors. Sub-paragraph (a) adds that this includes making the provision for "*clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections*)". In its response to the NPPF consultation, the Government confirmed that it would take forward these policy changes to bring the proposals in line with key sectors for growth identified in its draft industrial strategy. This is further supported by the Government's desire for the planning

system to drive greater commercial development for digital infrastructure where data centres produce an estimate £4.6bn in revenue each year[1].

5.26 The Council therefore needs to take into account the specific locational needs of data centres. The fact that data centres and grid connections are expressly referenced underscores the critical importance of data centres to Government's economic/industrial strategy. In combination with the increased tilted balance, Government clearly want planning decisions to facilitate data centre delivery.

5.27 The approach taken by the Government in the NPPF is consistent with the announcement made on 12 September 2024 by the Technology Secretary Peter Kyle, who confirmed that the Government has now classed data centres as 'Critical National Infrastructure' – significantly this is the first Critical National Infrastructure designation in almost a decade, since the Space and Defence sectors gained the same status in 2015. Momentum has continued to build post NPPF with the publication of an independent 'AI Opportunities Action Plan' on 13 January 2025 by the Department for Science Innovation and Technology, which includes the concept of AI Growth Zones for data centres and supporting infrastructure.

5.28 Paragraph 124 of the NPPF encourages the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed land.

5.29 Paragraph 125 goes on to state that planning policies and decisions should:

"a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside.

b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, floor risk mitigation, cooling/shading, carbon storage or food production.

c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;"

5.30 The proposals directly respond to para 125c).

5.31 Paragraph 143 sets out the five purposes of the Green Belt. Paragraphs 153 explains that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances, which will not exist unless the potential harm to the Green Belt by reason of its inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

[1] https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system#chapter-7--building-infrastructure-to-grow-the-economy

5.32 Paragraph 153 states that when "…considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness" - other than in the case of development on previously developed land or grey belt land, where development is not inappropriate (ie footnote 55).

5.33 A definition for 'grey belt' is included in Annex 2 as:

"For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. 'Grey belt' excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development"

5.34 Paragraph 155 has been introduced to state that, "*The development of homes, **commercial and other development** in the Green Belt should not be regarded as inappropriate where:*

a. The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

b. There is a demonstrable unmet need for the type of development proposed;.

c. The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and

*d. **Where applicable** the development proposed meets the 'Golden Rules' requirements set out in paragraph 156-157 below."*

5.35 In its consultation response on the NPPF, the Government justified its approach to progressing grey belt policy by saying: "*we believe that it is necessary to allow development on suitable grey belt land through decision making (in line with relevant triggers), in order to address the housing crisis and ensure other development needs are met*."

Planning Practice Guidance

5.36 The Planning Practice Guidance ("PPG") was originally published in 2014 and is regularly updated most recently on 27 February in relation to grey belt. The PPG adds further context to the NPPF and it is intended that the two documents are read together.

5.37 In relation to grey belt and specifically footnote 55, the PPG explains that if development is considered to be not inappropriate development on previously developed land or grey belt, then this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including to its openness.

5.38 This is consistent with rulings from the courts on these matters that, where development (of any kind, now including development on grey belt or previously developed land) is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and that therefore a proposal does not have to be justified by "very special circumstances" (paragraph 014, reference ID 64-014-20250225).

5.39 The PPG provides additional information on the role of the Green Belt in the planning system. It sets out that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *"openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *the degree of activity likely to be generated, such as traffic generation."*

(Reference ID: 64-001-20190722)

5.40 The PPG sets out that where Green Belt land is released for development, compensatory improvements to the environmental quality and accessibility are encouraged; this includes green infrastructure, landscape and visual enhancements, improvements to biodiversity and enhanced walking/cycling routes and recreational access (Reference ID: 64-002-20190722).

Industrial Strategy (2024)

5.41 The Strategy explains that additional data centre capacity and access to fast, secure, and reliable digital connectivity is essential to enabling economic growth and to reap the transformational productivity benefits of digitalisation and the adoption of AI. Continued investment is needed to meet ambitious targets to bring gigabit-capable broadband to all of the UK, and standalone 5G to all populated areas, by 2030.

National Data Strategy (2019)

5.42 The National Data Strategy sets out a framework for how the Government approach and invest in data as a key driver within the digital sector and across the economy. Mission Four of the Strategy ensures the security and resilience of the infrastructure on which data relies.

UK Digital Strategy (2022)

5.43 The Digital Strategy sets out this vision to make the UK the best place in the world to start and grow a technology business and set out the actions required to deliver it. It is estimate that the strategy to support and strengthen the digital economy could grow the UK tech sector's annual gross value added (GVA) by an additional £41.5 billion by 2025 and create a further 678,000 jobs. Therefore, considerably denoting the importance of data and digital infrastructure to support economic growth.

National Cyber Strategy (2022)

5.44 The new National Cyber Strategy is the Government's plan to ensure that the UK remains confident, capable and resilient in this fast-moving digital world; and that the country continues to adapt, innovate and invest in order to protect and promote the cyberspace.

Overarching National Policy Statement for Energy (EN-1) (2023)

5.45 The National Policy Statement sets out national policy for the energy infrastructure and has effect for the decisions by the Secretary of State on applications for energy developments that are nationally significant under the Planning Act 2008. The Statement can be a material consideration in Town and County Planning Act applications.

5.46 The Statement identifies that Energy Storage has a key role to play in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. Storage is needed to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.

Summary

5.47 The Site is located within the Green Belt, Strategic Gap, and Colne Valley Regional Park where planning policy requires proposals for inappropriate development to demonstrate that any harms are outweighed by very special circumstances and that development has an essential requirement to be in that location.

5.48 The Government is highly supportive of data-driven digital infrastructure and the updates in the revised NPPF is directly relevant to the proposed development. In particular, data centres have been specifically identified as critical national infrastructure and express support is given for zero carbon energy generation.

5.49 Furthermore, the Government has adopted a more relaxed approach to specific forms of development on Green Belt land, in particular where Green Belt falls within the definition of ‘grey belt’ ie it comprises previously developed land and any other land that make a limited contribution to the five Green Belt purposes. The Site is considered to be grey-belt for reasons explained later in this Statement.

6 Assessment of Need

6.1 The following section details the need that would be met by the proposed development, firstly, in the context of the data centre, followed by the BESS.

Data Centre Need

6.2 Data centres provide the core infrastructure that supports all digital activity across Government, business and community. They consolidate information technology functions for organisations by transmitting, receiving, processing, storing and managing digital data. As such data centres are essential infrastructure that support a significant part of the UK economy including business processes, government services, telecommunications, transport infrastructures and social networks.

6.3 This is reflected in the announcement made on 12 September 2024 by the Technology Secretary Peter Kyle, who confirmed that the Government has now classed data centres as 'Critical National Infrastructure' – significantly this is the first Critical National Infrastructure designation in almost a decade, since the Space and Defence sectors gained the same status in 2015. It is similarly reflected in the Government Industrial Strategy.

6.4 Data centres are, therefore, critical to the UK's economic performance.

6.5 The demand for data centres is being driven by the exponential increase in digital and data driven technologies across all business sectors. This rate of growth is expected to continue increasing due to the rise of the 'cloud', artificial intelligence and 5G. There is rapid growth in the amount of data that is being generated and that needs to be stored, which is being driven by the change in how people interact and how technology is used for personal, government and business activities. Driven by economies of scale and the need for increased capacity to deal with large volumes of data, there is a shift away from enterprise data centres (which serve one business) to colocation and hyperscale data centres (serving multiple).

6.6 The UK is one of the most attractive locations in the world for data centre operators. The Thames Valley is central to the UK's data centre landscape and a key cluster is located in and around SBC. As a direct result of this identified need, there is a sustained demand for sites around Slough.

6.7 Data centres need to be located where they have access to power and fibre, and hyperscale cloud providers need to be within close proximity to other data centres for resilience reasons.

6.8 Critical location drivers for hyperscale data centres relates to resilience and business performance. Factors include the size of site, access to an adequate and reliable power supply; access to fibre connectivity; a site that is physically resilient i.e. not at risk of flooding; and is in proximity to other data centres to provide resilience in the event of any failure. All of which are relevant to the development Site.

6.9 The London data centre market is the second largest globally, with the epicentre of activity being located in the Slough to Hayes 'Golden Corridor', in which the Site is well located. The

'Golden Corridor' is one of the most fibre rich areas in the UK due to its proximity to the Great Western Rail line and the Grand Union Canal which house the fibre ducts which ultimately transfer data across the Atlantic via a sub-sea fibre cable to the United States. The location is therefore critical both in terms of latency (i.e. the speed at which data is transferred) and connectivity. Importantly, the Site is also located within a Cloud Availability Zone (i.e. a geographical area where Cloud service providers have created a network) – these zones are finite and cannot be located further than circa15-20km fibre cable radius from the initial data centre deployment. Likewise, it is not possible for Cloud service providers to lease space outside of a defined Cloud Availability Zone.

6.10 Foundigital, an energy and internet infrastructure advisory firm, have produced a report[2], in support of a data centre development in Abbots Langley, that deals with need associated with Data Centres and includes the following key headline points:

- Demand for hyperscale data centres is driven by the exponential growth of data generation and thus the need for data storage.
- Cloud computing data can only be processed and stored in locations with resilient clusters of networked data centres (availability zones) which can quickly and cost effectively transmit data between each other, before sending the information out to the users.
- Hyperscale data centres are partially required due to obsolescence of existing facilities. The outskirts of London include a number of smaller (non-hyperscale) data centres which are at risk of becoming obsolete because they cannot accommodate the growth in data, lack economies of scale and will not be compliant with new environmental standards and regulations.
- There is a forecast need in the period up to 2027, to deliver an increase in data centre capacity in London of between 2,250MW to 3,100MW (a mid-range or average of 2,665 MW).

6.11 The Department for International Trade (DIT) Policy Paper[3] states that data centres are at the heart of the UK's digital infrastructure and represent the focal point where Government's industrial and digital strategies meet. The Paper sets out the need for data centres, their importance to economic strategies, and future prosperity, summarised in the below:

- Data Centres are key to the ambition of consolidating the UK as a leading science and technology superpower that is expected to help grow a modern economy, create better paid jobs and improve opportunities across the country as well as improve foreign direct investment to secure long-term sustainable economic growth and innovation.
- Data Centres are at the heart of the UK's digital infrastructure and represent the focal point of the government Industrial Strategy and the Digital Strategy. Data centres are considered a critically important part of that digital infrastructure.

[2] FoundDigital DS, Planning Guidance Report Technical and Market Assessment, June 2023. Available at: https://www3.threerivers.gov.uk/online-applications/files/A74E2CBED3BFFD24CE6A44B3D44E9785/pdf/23_1068_OUT-PLANNING_GUIDANCE_REPORT_-_TECHNICAL___MARKET_ASSESSMENT-778898.pdf
[3] Department for International Trade (DIT), Policy Paper on Digital Trade, September 2021

- The UK is a globally important data centre market (holding 6% of the world market share), home to the largest data centre market in Europe (holding around 25%+ of market share) and the world's second-largest commercial cluster.
- There are vast economic benefits in terms of GVA and job creation (including multiplier effects).
- Recognition that the volume of data generated increases exponentially year on year, which requires appropriate infrastructure and storage in data centres.

6.12 NPPF paragraph 87 has been updated to reference that planning decisions should recognise and address the specific locational requirements of different sector, and make provision for: "*a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections).*" This denotes the importance national policy is placing on the need for data centres and their role in contributing towards the economy. The application proposals seek to address this need.

6.13 The need for data centres is also reflected in recent appeal decisions. A recent appeal in Buckinghamshire (PINS Ref: 3307420) for a hyperscale datacentre in the Green Belt identified the notable need for data centres, both locally and nationally, and their essential role in supporting the national and regional economy.

6.14 The Secretary of State's decision letter states that there is:

"a significant and substantial demand for new data centres in the Slough Availability Zone (SAZ), that the provision of data centres would make a significant contribution to the UK economy, and that the appeal proposal would make a significant contribution to this need".

6.15 As a result, the Secretary of State concludes that "*significant weight*" should be given to the need for additional data centre capacity within the UK and specifically the SAZ. The Inspector's Report states that there is an "*urgent and overwhelming need for new hyperscale data centres both in the UK and within the SAZ*". The Inspector notes that the need has been estimated at 1730MW by 2027, which equates to an estimated need for around 12 to 15 new hyperscale data centres in this period in the SAZ.

6.16 The Inspector's Report explains that the growth in the need to store and process data is being driven by a number of factors, including the growth in cloud computing, personal internet usage, the obsolescence of smaller less efficient data centres and the exponential expansion of digital data.

6.17 The Inspector notes the importance of sites within the SAZ being that hyperscale data centres need to be developed in clusters in order to provide resilience and support for each other in the event of power loss. The SAZ lies close to digital connections which run from London out to the southwest and across the Atlantic to North America. This has driven the growth of data centres along this corridor to the west of London.

6.18 The Inspector accepted that hyperscale data centres will not be developed outside recognised availability zones as they will not be able to ensure that access to the data they hold will always be available due to the time taken for data to move between sites. As such the Inspector concluded that "*the market will not develop beyond these areas*" and the "*location of data*

centres is entirely market driven" (para 253). The Inspector's Report noted that the SAZ accounts for at least 65% of the capacity across London. As a result, the Inspector gave "*significant weight to the need for additional data centre capacity within the UK and the SAZ*" (para 254).

6.19 The Inspector explains that although the NPPF does not have a specific policy on hyperscale data centres (albeit the draft NPPF sets out clear support for the delivery of data centres to drive high technology industries and support a modern economy), it does support building a strong and competitive economy. It does this through, amongst other things, expecting planning decisions to create the conditions in which business can invest, expand, and adapt. It expects decision makers to give significant weight to the need to support economic growth and take account of the wider opportunities for development. Moreover, it states that this is particularly important where Britain can be a global leader in driving innovation. The NPPF also acknowledges that planning decisions should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data driven industries.

6.20 In respect of the matter of 'need', the Inspector concluded by noting that the Government places considerable importance on data centre provision and the contribution they can make to the national economy, growth, and the objectives of the Government as a whole. The appeal proposal would deliver around 147MW towards the anticipated demand of 1730MW in the SAZ up until 2027 which "*would be a significant contribution to meeting that demand*". Overall, the Inspector concluded:

"I have no doubt that there is a significant and substantial demand for new data centres in the SAZ. Furthermore, the provision of data centres would make a significant contribution to the UK economy. Moreover, the appeal proposal would make a significant contribution to this need. I therefore give considerable weight to the need for a new hyperscale data centre in the SAZ.(para 259)"

6.21 Furthermore, a similar appeal decision for a hyperscale data centre in the Buckinghamshire Green Belt (PINS Ref: 3297192) concluded that there is a notable need for such data centres within the locality and also the country as a whole and it's development would assist in the generation of economic benefits through the supporting of business activities noting its location in the SAZ and its accessibility to infrastructure.

6.22 The Inspector also concluded that the site's location within the Green Belt would respond to a specific identified need both in the locality and the wider area and that although alternative sites in the surrounding area had been considered, it was apparent that there are relatively few alternative options for the location of the proposed development.

6.23 In addition, on 6 December 2024 the Secretary of State approved a recovered appeal for a data centre on Court Lane in Iver, Slough. In respect of need, the following conclusion was reached:

"For the reasons given at IR225 to IR230, the Secretary of State agrees with the Inspector that the site is an optimal site and location for data centre use and there is a clear lack of alternative sites available at present to meet the demand for such data centres in the Slough and Hayes

Availability Zones. She agrees with the Inspector that failure to meet this need could have significant negative consequences for the UK digital economy (IR227).

The Secretary of State further agrees with the Inspector's assessment that significant weight should be attached to the need for new data centres, and that the proposal would make a significant contribution towards meeting the need for data centres both in the UK and in the Slough Availability Zone (IR230). (paras 19 and 20)".

6.24 The Secretary of State also agreed "*that the re-use of a large area of previously developed land would be a clear benefit of the scheme to which significant weight should be attached*". (para 22)

6.25 In summary, there is a significant need for data centres in the UK, particularly in and around London, and the Site is located within an important availability zone which will make a critical contribution to supporting London and the UK economy. This is reflected in current national policy. In addition, the revised NPPF emphasises the national importance and need for data centres, making clear that provision should be made for economic infrastructure needs including data centres and that the planning system must respond positively to these needs.

6.26 Evidence shows that there is an urgent need for additional data centre capacity, which is especially acute in the SAZ given its importance in supporting the economic success of London. However, limitations in power capacity in the Slough area are placing a significant constraint on the ability to deliver new hyperscale data centres in the SAZ. This matter is described in full in the accompanying Alternative Site Assessment, but in summary until upgrades are delivered to the Iver substation it is unlikely that any significant date centre development will be feasible unless they can demonstrably obtain the necessary power. The timescales for the substation upgrades are unclear, but it is understood to be 2030 at the earliest, potentially as long as 2035.

6.27 Uniquely, the Applicant has secured a contractual agreement with EDF to obtain power from both Iver and Laleham sub stations. The power connections will be available in 2027. Failure to deliver the development at the Site within these timescales will miss the opportunity to secure the power and meaning that the benefits of the delivering the additional data centre capacity (as well as the BESS) will not be realised.

6.28 This has a consequential impact on the UK economy, as data centre investors will inevitably look to competing European destinations to fulfil their commercial needs. Details are set out in full in the Alternative Site Assessment submitted in support of the application.

Battery Energy Storage Need

6.29 Parcel B of the application proposals is for the delivery of a BESS. Batteries are used to store energy at times where supply exceeds demand and release it back into the national grid as and when required. Battery storage is widely considered vital infrastructure to support the production of renewable energy and for energy security.

6.30 Energy security has in recent years become an increasingly prevalent issue and is of national importance. In 2022, the UK Government published British Energy Security Strategy[4], which sets out ambitions to reduce the UK's dependence on imported fuels by investing in renewables and supporting infrastructure to deliver a "radical long-term shift" towards energy independence and net zero. Battery Energy Storage is critical infrastructure to support the shift to renewable energy, by storing energy at time of high levels of production and returning it back into the national grid when demand increases. The Government has said the decarbonised power system would need to be underpinned by technologies that can respond to fluctuations in supply and demand, and this includes energy storage.

6.31 A key component of the Energy Security Plan[5] is to move away from fossil fuels to clean energy, which has the dual benefit of reducing emissions and tackling climate change, as well as securing greater energy independence. A "hyper flexible" system is needed to support the transition to energy security and net zero and allow the UK's energy supply to better withstand "supply shocks and external changes in the international environment." Without this flexible system, the benefits of switching to renewable sources of energy cannot be properly realised.

6.32 Battery Energy Storage Systems ("BESSs") are a key component of this flexible infrastructure as they store energy produced when supply levels are high, for example solar energy on sunny days and wind power on windy days and put energy back into the grid when demand is high. In their latest Future Energy Scenarios report (2023), the National Grid Electricity System Operator ("NGESO") estimate that there will need to be a minimum of 30 gigawatts ('GW') of storage capacity in the country to meet the net zero 2050 target.

6.33 In recognition of the importance of system flexibility and of BESSs in providing this, Government has sought to remove barriers to their delivery.

6.34 The NPPF and ministerial statement makes reference to national infrastructure growth ambitions by making it *"simpler and faster to build the clean energy sources needed to meet zero carbon energy generation by 2030".* Furthermore, the NPPF states that development of local, regional or national importance would not be inappropriate development in the Green Belt. It is clear from Government policy that BESS is an example of nationally important infrastructure.

6.35 Paragraph 166 provides a positive presumption in favour of decentralised energy proposals by accepting that such proposals may be able to demonstrate, having regard to the type of development involved and its design, that this is not feasible or viable to comply with development plan policies.

6.36 Paragraph 168 also states that when determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, local planning authorities should not require applicants to demonstrate the overall need, and should

[4] British Energy Security Strategy, HM Government, April 2022. Available at: https://www.gov.uk/government/publications/british-energy-security-strategy/british-energy-security-strategy
[5] Powering Up Britain: Energy Security Plan, Department for Energy Security & Net Zero, April 2023 https://www.gov.uk/government/publications/powering-up-britain/powering-up-britain-energy-security-plan

give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.

6.37 The National Policy Statement for Energy (2023) sets out national policy for the energy infrastructure and highlights the importance of Energy Storage in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated. Storage is imperative to reduce the costs of the electricity system and increase reliability by storing surplus electricity in times of low demand to provide electricity when demand is higher.

6.38 Recent appeal decisions further support the identified need for battery energy storage. An appeal for a battery energy storage facility in the Green Belt in Mill Hill, Barnet was allowed (PINS Reference: 3298962) with the Inspector noting that the proposal was required to improve energy storage particularly for renewable inputs to the national grid and that it was important to accommodate the fluctuating nature of energy generated from renewable sources and therefore very significant weight was afforded in its favour as it would assist in meeting the government's net zero targets.

6.39 Similarly, an appeal for battery storage in Hampshire was allowed (PINS Ref: 3289603) with the Inspector concluding that battery storage facilities are a key component of the country's energy facilities, and that there is substantial need for more electricity storage to balance demand without resorting to fossil fuels. It was also acknowledged that much of the demand for electricity is generated by the south of the UK, yet it is generated in the north of the country. Therefore, there is a need for adequate storage facilities close to where the need for the electricity is deployed.

6.40 Overall, there is a clear and compelling need for battery storage facilities and recent appeal decisions have demonstrated the role battery energy storage plays in facilitating renewable energy production and achieving net zero targets.

7 Planning Considerations

7.1 This section of the Statement provides an assessment of the proposals against the key policies of the Development Plan, having regard to relevant material considerations.

7.2 Paragraph 153 of the NPPF states that planning permission should not be granted for inappropriate development in the Green Belt unless very special circumstances exist, which requires the definitional harm to the Green Belt by reason of inappropriateness, and any another harm caused, to be clearly outweighed by other considerations - other than in the case of development on previously developed land or grey belt land, where development is not inappropriate.

7.3 In light of the above, this section considers the following planning considerations in respect of the application proposals:

- Green Belt
- Strategic Gap & Colne Valley
- Design and Heritage
- Ecology
- Transport
- Flood Risk and Drainage
- Contaminated Land
- Airport Safeguarding
- Need
- Alternative Sites Assessment
- Economic Benefits

7.4 These are discussed in detail in turn below.

Green Belt

7.5 The Site lies within the Green Belt. Core Policy 1 of the Core Strategy requires development to take place in the built-up areas of the borough, where possible on previously developed land, unless very special circumstances can be demonstrated to justify development in the Green Belt.

7.6 Paragraph 153 of the NPPF states that the construction of new buildings is regarded as inappropriate development in the Green Belt - other than in the case of development on previously developed land or grey belt land, where development is not inappropriate. Exceptions to this are set out in paragraph 154, which sets out certain other forms of development that are considered not inappropriate in the Green Belt provided they preserve its openness – none of which currently apply to the proposed development.

7.7 The Site comprises previously developed land in the northern parcel, and undeveloped land in the south, connected by an existing track. For the reasons set out below the Site is considered to be 'grey belt'.

7.8 In this context careful consideration has been given to the role of the Site against NPPF purposes a, b and d, as well the 4 tests within para 155, namely:

- the development would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;
- there is a demonstrable unmet need for the type of development proposed;
- the development would be in a sustainable location;
- where applicable the development proposed meets the 'Golden Rules' – as this is not a housing scheme the Golden Rules do not apply.

7.9 In respect of the assessment against the NPPF purposes a, b and d, the application is supported by a Green Belt Assessment which has assessed the role and function of the northern and southern parcels of the Site against all purposes of the Green Belt, as set out at Paragraph 143 of the NPPF.

7.10 The Green Belt Assessment sets out the analysis in full, however, a summary overview is set out below:

- **Parcel A**
  - **Purpose A: To check the unrestricted sprawl of large built-up areas** – Parcel A lies adjacent to the Britannia Industrial Estate, which is already fully urbanised, and, as evidenced by the development which has occurred on it, the Green Belt designation of the parcel has not prevented sprawl. Indeed activity has extended beyond the parcel's boundary to the west. Parcel A therefore makes no contribution to Purpose 1.
  - **Purpose B: To prevent neighbouring towns merging into one another** - Whilst the Site does not lie adjacent to any major towns, such as Slough, it does fall within the Colnbrook and Poyle Strategic Gap, intended to maintain a gap between the eastern edge of Slough and the developed area of Greater London. However, in an appeal decision relating to land near Parcel A in 2016 (PP/J0350/A/12/2171967), the Inspector stated that '*The appeal site is situated in the extreme southwest corner of a designated strategic gap. It is however somewhat remote from Slough …Residential properties are situated to the north of the site, and these extend from Slough into the gap… The site is therefore not prominent in this part of the gap, and the appeal development would serve to fill in and regularise the boundary of the gap, without threatening the open area to the west of the site.'* It is concluded that Parcel A does not therefore make any contribution to Purpose 2.
  - **Purpose C: To assist in safeguarding the countryside from encroachment** - Parcel A cannot be characterised as countryside due to the existing land uses and activity which represent urbanising development. The parcel relates more strongly to the urban edge. The Green Belt designation has not therefore safeguarded the countryside and the parcel makes no contribution to Purpose 3.

- **Purpose D: To preserve the setting and special character of historic towns** - There are no historic towns of the type meant by the Framework near the Site. Whilst the Colnbrook Conservation Area lies approximately 500m northwest of Parcel A and it is recognised that open land or countryside can provide an open setting or buffer for places with historic features, there is no relationship or connection between Parcel A and the Conservation Area in the form of character or visual perception. Parcel A therefore makes no contribution to Purpose 4.
- **Purpose E: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** - due to the existing land uses, Parcel A can be characterised as already being derelict or urban land. Unusually for Green Belt land, Parcel A therefore does not contribute to Purpose 5.

- **Parcel B**
  - **Purpose A: To check the unrestricted sprawl of large built-up areas** – Parcel B lies adjacent to the Britannia Industrial Estate and relates to both the urban area and to the wider countryside in that it lies adjacent to a built-up area but has a relatively strong sense of openness. The Green Belt designation may have restrained development to the west of Poyle Road and it is considered that Parcel B makes a limited contribution to Purpose 1.
  - **Purpose B: To prevent neighbouring towns merging into one another** - Like Parcel A, Parcel B does not lie adjacent to any major towns, such as Slough, but does fall within the Colnbrook and Poyle Strategic Gap. However, like Parcel A, Parcel B is situated in the extreme southwest corner of the gap, is not prominent in this part of the gap and is remote from Slough. Development in Parcel B would not threaten the open area to the west of the site and it is therefore concluded that Parcel B makes no contribution to Purpose 2.
  - **Purpose C: To assist in safeguarding the countryside from encroachment** - Parcel B can be characterised as countryside and the parcel therefore makes a significant contribution to Purpose 3.
  - **Purpose D: To preserve the setting and special character of historic towns** - There are no historic towns of the type meant by the Framework near Parcel B, and as with Parcel A, there is no relationship or connection between Parcel B and the Conservation Area in the form of character or visual perception. Parcel B therefore makes no contribution to Purpose 4.
  - **Purpose E: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land –** Parcel B is undeveloped and therefore makes contribution to Purpose 5.

7.11 In respect of Parcel A, the Green Belt Assessment evidences that the land is underperforming and does not contribute to any of the purposes of the Green Belt. Parcel A can therefore be classified as 'grey belt' as it does not strongly contribute towards purposes A, B and D, as defined by the NPPF.

7.12 When considering to what extent Parcel A exhibits the essential Green Belt characteristic of openness, the Green Belt Assessment concludes that it has no notable openness. It contains built form and is generally visually contained at ground level by boundary vegetation and security fencing. The northern area of the parcel is screened, and relatively high levels of

activity and vehicle movements linked to current land uses were observed. The whole parcel is therefore considered to be dominated by urban land uses

7.13 It is considered that Parcel A does not contribute to the visual openness of the Green Belt, either across the parcel itself, due to the existing built form and activity, or from beyond the parcel, contributing to visual separation. The assessment concludes that Parcel A cannot be considered as part of the countryside, rather an extension of the urban/settled area.

7.14 If Green Belt openness relates to a lack of 'inappropriate development', applying the definitions of appropriate development provided in the NPPF (paragraphs 154 and 155), Parcel A is considered to already contain inappropriate development.

7.15 Overall, it is concluded that Parcel A does not exhibit the Green Belt characteristic of openness.

7.16 Considering to what extent Parcel B exhibits the essential Green Belt characteristic of openness, whilst it is visually contained by mature boundary vegetation, it contains no built form and does contribute to the visual openness of the Green Belt, both within the parcel itself and in views from the west. Parcel B is therefore considered to exhibit the essential Green Belt characteristic of openness.

7.17 Overall, it is considered that Parcel B makes a contribution to Green Belt Purpose C and a limited contribution to Purpose A, and in part exhibits the essential Green Belt characteristic of openness. Therefore, consistent with the NPPF definition, Parcel B represents 'grey belt' as it fails to make a strong contribution to purposes A, B and D of Paragraph 143.

7.18 These conclusions are consistent with the outcomes reached following the 2009 planning appeal (as described in Section 2). In that case the Planning Inspector accepted that Parcel A contributed little to the role and function of the wider Green Belt. The decision acknowledged that the land was not prominent and was well contained on three sides. As a result, the Inspector concluded that the land did not perform a strong Green Belt function and that the buildings and traffic associated with the uses would have a limited impact on the openness of the Green Belt.

7.19 Furthermore, similar conclusions were also reached on land immediately to the north, on the site of the current Hilton hotel. In 2004 permission was secured for a data centre, following a Secretary of State call-in. The decision confirmed the poor-quality nature of the land and the surrounding area from a Green Belt perspective. The Inspector concluded that the site is not in open countryside and that it is strongly influenced by the proximity of a large industrial estate, distributor road and adjacent land uses (Parcel A). The Secretary of State considered therefore that development would cause "*limited additional harm to the Green Belt in terms of loss of openness and visual impact"* which was crucial context in light of justifying inappropriate development in the Green Belt.

7.20 In summary, based on the very clear evidence submitted, it is clear that Parcels A and B categorically are grey belt land because:

- they are underperforming and do not make a strong contribution to purposes A, B and D of the Green Belt;
- they do not fundamentally undermine the remaining Green Belt;

- they address a demonstrable unmet need and
- are in a sustainable location having regard to the nature of the development proposed.

7.21 As a result the proposals do not represent inappropriate development as per para 153 footnote 55. This reflects Government support to open up land for much needed development, in particular on poor quality Green Belt land and for critical national infrastructure such as data centres and facilitates that support the zero-carbon agenda such as BESS, consistent with para 155(b).

7.22 However, even if the Council was of the view that the Site is not grey belt (which the Applicant does not accept for the reasons outlined above), on the whole the Site is evidenced to be underperforming: it has a low Green Belt role and makes a limited contribution to the purposes of the Green Belt and openness. This is largely characterised by the wider context and surrounding industrial landscape character the Site sits within.

7.23 Given the role and limited value of the Green Belt, the Data Centre on the northern portion of the Site will have limited or no harm to Green Belt purposes as it is considered that Parcel A currently makes no contribution to Green Belt purposes as defined in the NPPF and does not exhibit the Green Belt characteristic of openness.

7.24 Some harm may result from the BESS on Parcel B as it is assessed as making a significant contribution to Purpose 3 of the Green Belt and a limited contribution to Purpose 1 as well as exhibiting the essential Green Belt characteristic of openness.

7.25 The development of the type and scale proposed would be compatible in terms of design, form and appearance with the character of the surrounding area and, notwithstanding the loss of openness of Parcel B, would not result in unacceptable harm to the contribution made by the wider Green Belt to its purposes and would provide improved access to existing high quality green space. Further details are set out in the accompanying Green Belt Assessment.

7.26 Consequently, even if the Site were not considered to be grey belt, the proposed development will result in minimal Green Belt harm, which is supported by appeal decisions in and around the Site which confirm the land is not open countryside and is strongly influenced by the proximity of a large industrial estate and distributor road.

Strategic Gap & Colne Valley Regional Park

7.27 The Site lies within the Strategic Gap and Colne Regional Valley Park. Core Policy 2 permits development within these locations if it is demonstrated that it is essential for the development to be in that location.

7.28 The Colne Valley Regional Park was founded in 1965 and has the following six objectives:

- Maintaining and enhancing the landscape
- Safeguarding the countryside – where development is permissible with adequate mitigation for the benefit of the local countryside and community
- Conserving and enhancing biodiversity
- Providing opportunities for countryside recreation

- Achieving a vibrant and sustainable rural economy
- Encouraging community participation

7.29 The Site is located in the Horton and Wraysbury Lowlands Landscape Character Area. The Assessment notes that much of the area has been altered by gravel extraction and due to the proximity of Heathrow Airport, planes are often seen and heard impacting the feeling of tranquillity, and in places the area reflects a lack of management and suffers from fly tipping, resulting in an unkempt character.

7.30 This is especially the case with the northern part of the Site which accommodates a range of industrial activities, resulting in poor quality landscape character and negative environmental impacts. Whilst the southern part of the Site does not represent previously developed land, its strong boundary features means that it fails to truly contribute toward the objectives of the Regional Park, limiting recreational opportunities and community participation. The Site is privately owned which is not publicly accessible.

7.31 As a result, the existing Site offers a very limited contribution to the characteristics of the Regional Park and fails to support the principles of the Strategic Gap.

7.32 A Landscape and Visual Impact Assessment ("LVIA") accompanies this planning application submission, which confirms that the landscape sensitivity of the Site is low, and the sensitivity of the visual receptors is also low. The LVIA explains that the scale and type of development proposed on Parcel A could be accommodated without resulting in major adverse landscape or visual effects due to the low sensitivity of the receiving landscape, the lack of sensitive visual receptors and the prevailing character of the context.

7.33 The LVIA also demonstrates that the BESS will have no impact on the landscape character of the Regional Park, largely because the structures/infrastructure cannot be seen through/above the existing dense boundary vegetation.

7.34 Overall, the LVIA demonstrates that the application proposals will have a minimal impact on the landscape character of the Colne Valley Regional Park. The existing enhanced and proposed boundary treatments will play a significant role in screening views into the Site from the Public Right of Way to the south and west – as shown in the photography contained in the LVIA.

7.35 Where the Site can be viewed, it is characterised by on-site industrial activities and is seen against the backdrop of industrial buildings within the Poyle Trading estate beyond to the east. Consequently, the development will have a limited impact on the landscape character of the Regional Park.

7.36 The Colne Valley Park has prepared a Green Infrastructure Strategy which highlights the green infrastructure assets of the Regional Park and sets out approaches for enhancement and interconnectivity. The Infrastructure Strategy integrates with the 'Green Envelope' in and around Colnbrook and defines environmental enhancement projects for the area, including improved access to the Arthur Jacobs Nature reserve.

7.37 The application proposals deliver significant enhancements to landscaping and pedestrian/cycle connectivity on site and facilitate the delivery of a new route from the northwest corner of the Site to the Arthur Jacobs Nature reserve.

7.38 In summary, the existing Site makes a limited contribution to the landscape character of the Colne Valley Regional Park and the Strategic Gap. Within this context, the proposals result in negligible harm to the landscape character of the Colne Valley, removing uncoordinated industrial activities and introducing a high-quality data centre and BESS development. Furthermore, the proposals will deliver substantial landscape and public realm improvements both on-site and off-site connecting to the Arthur Jacobs Nature reserve which results in a material benefit to the Regional Park, as well as a biodiversity net gain in excess of 10%.

7.39 The proposals do not result in any meaningful impact to the Strategic Gap given the previously developed nature of the northern part of the Site, and the strong boundary features of the land to the south.

7.40 The necessity of the proposals to be located on the proposed application Site is set out in the Alternative Site Assessment which is addressed below.

Design & Heritage

7.41 The Development Proposal adopts a careful and thorough design approach which is detailed in the accompanying Design and Access Statement.

7.42 The application proposals have minimised land take from a Green Belt perspective by keeping the footprint of the built form to a minimum. Whilst the proposed built form is larger in scale than the buildings which currently occupy the Site, impact on views has been carefully considered and found to be acceptable. Ancillary equipment will be contained within screened areas using sympathetic materials at ground and roof level.

7.43 The proposed design emphasises a green buffer along Poyle Road to enhance screening in areas where the site is most visually exposed.

7.44 The proposal is of a high quality design which responds to be requirements of the NPPF. Despite being located within an industrial area, the Applicant has adopted a best in class approach to the design of the data centre to respond to its location within the Green Belt and on edge of the Strategic Gap and Colne Valley Regional Park.

7.45 The architectural design seeks to reflect both historical and contemporary influences within the Poyle Road context. To achieve this, the proposal draws inspiration from two notable local landmarks: the rich brick textures of the south wall and north chimney of the Poyle Farm Listed Building, located nearby, and the roof and original structure of The Hollies, a listed building directly opposite the proposed site entrance.

7.46 The height and massing have been carefully considered to set back the primary structure in Parcel A from the eastern boundary. This approach organises the three primary structures, the data centre, generators, and office accommodation, into a cohesive cluster, each rising to three storeys. Positioned as far west as possible to minimise view from Poyle Road, this cluster

increases the distance from both the main entrance on Poyle Road and the neighbouring Hollies listed heritage asset.

7.47 The generator gantry and office elements of the data centre are designed with lower heights, creating a smooth transition in building elevations across the cluster.

7.48 The taller elements of the scheme are the data centre cooling systems located at the roof level, and the generator exhaust flues, located at the northern face of the building cluster. Both elements have a maximum height of 30 m from the ground floor which falls below the London Heathrow Airport Obstacle Limitation Surfaces (OLS).

7.49 Typical Data Centre developments often establish secure boundaries along the public realm, creating a hard urban edge. In contrast, the proposed design includes the creation of a carefully considered active frontage at the Site entrance and sets the massing back from the eastern boundary on Poyle Road. This allows room for the creation of a 200m long public area of open space, which maximises opportunities for landscape, green space and ecology enhancement.

7.50 The scheme also provides off-site Green Belt enhancements with a new route to the Arthur Jacob Nature Reserve for community use from Poyle Road.

7.51 Development on Parcel B proposes to retain, and where necessary enhance, the existing thick boundary hedges. This will ensure that the BESS infrastructure cannot be viewed from the east on Poyle Road or on the Public Rights of Way to the west and south.

7.52 A dense landscape buffer zone runs parallel with the Site boundary to significantly protect the Site from intrusion, while retaining and enhancing the biodiversity credentials. Wherever possible, existing plantings, trees, and hedgerows present on the Site are retained. Additional landscaping is proposed across the Site, especially at boundaries, to take increasing the biodiversity value.

7.53 The character of proposed green infrastructure will be broadly informal and naturalistic, using native / semi-native plant species. Fronting the main entrance to the data centre, landscaping will take on a semi formal/formal character, defining the destination space and reflecting the form of the building.

7.54 Core Policy 9 (Natural and Built Environment) requires development to enhance and protect the historic environment; respect the character and distinctiveness of existing buildings, townscapes and landscapes and their local designations; as well as enhance and preserve natural habitats. Section 16 of the NPPF sets out to conserve and enhance the historic environment. Paragraph 212 states that great weight should be given to the conservation of heritage assets when considering the impact of a proposed development on the significance of a designated heritage. Paragraph 215 states that "*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*".

7.55 The southern and northern parcels that form the Site are separated by a field containing three built structures - one of these is the Grade II listed Poyle Farmhouse. There are also four other

Grade II listed structures within the vicinity of the Site, notably The Hollies on the opposite side of Poyle Road.

7.56 The application is supported by a Heritage Impact Assessment which concludes that the two built heritage assets could potentially experience some effect to their setting or significance due to the application proposal. Balancing the proximity of the proposals to the listed buildings, with the fact that there is currently significant industrial development within the surrounding area and that there would be inbuilt design mitigation, it has been concluded that there would be a less than substantial degree of harm, at the lower end of that scale, to the significance of the built heritage assets. A less than substantial effect would be balanced against the high-quality design and public benefits of the scheme, in accordance with paragraph 215 of the NPPF.

Ecology

7.57 In accordance with Policy CG1 and Core Policies 8 and 9, the proposals will be sensitively designed to mitigate impact on the surrounding environment, including the SSSI, SAC and LNR located to the west.

7.58 The Development will primarily impact habitats of negligible ecological importance. Loss of trees and mixed scrub of local ecological importance will be compensated for by proposed replacement tree and scrub planting. With the enhancement and habitat creation proposed across the Site, including native species planting, habitats of ecological importance on Site will be enhanced, providing additional opportunities for biodiversity in the area, particularly compared to the existing ecological state of the previously developed land in Parcel A.

7.59 The existing buildings on Site, located in Parcel A, were assessed as having low suitability to support roosting bats and no emergences were identified during surveys, thus denoting bat roosts are absent on Site. Should any vegetation or existing building be removed during core bird nesting season (March-August), a pre-works ecological check is required.

7.60 Biodiversity net gain (BNG) is a way of creating and improving natural habitats. BNG makes sure development has a measurably positive impact on biodiversity, compared to what was there before development. BNG is a mandatory national requirement, where a minimum of 10% is required for the majority of developments. The proposals would result in a net gain of 11.76 habitat units (115.53%) and 0.23 hedgerow units (10.07%), offering an overall net gain in excess of 10% and thus in compliance with national policy.

Transport

7.61 Core Policy 7 requires all new development to reinforce the principles of the transport strategy as set out in the Council's Local Transport Plan and Spatial Strategy, by ensuring it is sustainable and located in the most accessible locations, thereby reducing the need to travel.

7.62 The Site is in close proximity to the existing industrial areas to the east of Poyle Road, accessible from J14 of the M25. The application is accompanied by a Transport Assessment which explains that the built-up area surrounding the Site would be considered suitable for pedestrians, though not for the mobility impaired due to the lack of formal crossing points,

dropped kerbs and tactile paving. Cycling is also possible but favours more experienced cyclists.

7.63 The focus of transport and land use planning policy is on the development of sustainable travel measures and the encouragement of development proposals which widen the accessibility to sustainable travel. The proposed development aligns with this focus by providing improved footways from the Site access to nearby bus stops. There are bus stops near the site which benefit from up to five buses an hour, allowing staff to travel sustainably to the site. There are also railway stations accessible via bus, bike or vehicle.

7.64 The Site will be accessed via the current junction off Poyle Road. Junction improvement proposals have been set out and comprise upgrading of the existing access to provide a left-in, left out junction. The current secondary access to the north is proposed to be closed and reuse for pedestrian/cycle access purposes. This will reduce the number of junctions in this part of Poyle Road.

7.65 Emergency access to the southern parcel will be obtained from the Poyle Road and Blackthorne Road roundabout.

7.66 A parking accumulation assessment has been undertaken based on the forecast trip generation. This forecasts that the busiest hour for parked cars is 10:00-11:00, with up to 113 vehicles parked. The Applicant has provided details of the expected range in employee numbers which will be up to 100 employees. The number of proposed employees is therefore fewer than the maximum number of parked vehicles. Given this, 86 car parking spaces are proposed for the site. This is reflective of the size and scale of the site when compared with most other Data Centres and is also based on staffing numbers. The quantum of parking is informed by the accessibility of the Site, where it is anticipated a number of staff will travel by car. 20% of spaces will receive active charging infrastructure and 80% will receive passive charging for potential future charging points.

7.67 Cycle parking is reflective of established data centre operations in the Borough, confirming the provision of 39 spaces are required.

7.68 There are currently 1,095 two-way vehicle movements across the day associated with the existing land uses. The typical AM and PM peaks of 08:00-09:00 and 17:00-18:00 generate a total of 55 and 70 two-way trips respectively. The proposed development is forecast to produce up to 51 two-way vehicle trips during the AM peak and up to 31 two-way vehicle trips during the PM peak. Therefore, the proposed development will result in the beneficial reduction of vehicle trips by up to 525 two-way movements across the day.

7.69 Overall, the accompanying Transport Assessment and highway plans set out the application proposals in further detail. It confirms that the development proposals promote sustainable modes of transport by facilitating and improving access to the existing public transport network and providing suitable cycle parking facilities. The proposed development is expected to reduce the impact of traffic on the local road network compared to the existing uses of onsite which acts as a material benefit of the development.

Flood Risk and Drainage

7.70 Core Policy 10 requires new development to supply all reasonable and necessary on-site and off-site infrastructure improvements including but not limited to utilities notably water, sewerage and drainage.

7.71 The Poyle Channel is located immediately north of Parcel A and the Colne Brook is located approximately 310m west of the development. The topographical survey and Ordnance Survey information shows a series of ditches, including a ditch network adjacent to Poyle Road, which is located east of the site. There is also a ditch following the northern and western boundary of the southern parcel of land, which appears to route southwards and is assumed to drain into the Wraysbury Reservoir.

7.72 A utility survey was also completed by TFT Consultants in December 2023. This suggests that in Parcel A, some external areas drain at an unrestricted rate into the ditch network. Surcharged soakaways were also identified in the GPR survey. The remaining surface water runoff drains into the former development's foul drainage network and outfalls into the public sewer, which is located in Poyle Road. This public sewer routes southwards before connecting into a Thames Water pumping station, which is sited adjacent to the Poyle Road/Blackthorne Road roundabout.

7.73 Elevated groundwater levels have been recorded on Site; however, the implementation of a new surface drainage system will intercept and store surface water run-off on Site, which will reduce the ground saturation which can lead to groundwater flooding. Proposed SuDS within Parcel A will be appropriately lined to ensure capacity is not reduced by groundwater ingress and site levels will generally be retained or raised. Therefore, the risk of groundwater flooding is considered low.

7.74 The Environment Agency's flood map for planning shows that the site is located in Flood Zone 1 and is not at risk of flooding. Developments in this flood zone do not have any restrictions, provided they do not increase the risk of flooding elsewhere. The EA's indicative Surface Water Flooding map shows that the site is generally at low risk of surface water flooding. The proposed SuDS will reduce peak run-off rates from Site to receiving sewers. Therefore, the risk of surface water flooding is considered low.

7.75 The Site is at risk of reservoir flooding from the Wraysbury Reservoir and the Queen Mother Reservoir, which are located in close proximity to the Site. However, the EA's information states that reservoir flooding is extremely unlikely to happen, and the Reservoir Act of 1975 ensures that reservoirs are inspected regularly, and essential safety work is carried out. Therefore, the flood risk from reservoir flooding is considered low.

7.76 The SBC Strategic Flood Risk Assessment (SFRA, 2021) notes that "much of Colnbrook and Poyle is prone to groundwater flooding" and British Geological Survey (BGS) maps suggest that portions of the development site have potential for groundwater flooding to occur at surface level. However, the proposed SuDS will be designed to prevent groundwater ingress and the implementation of a new surface water drainage system will intercept and store surface water runoff and reduce ground saturation. The proposals do not involve significant lowering of existing ground levels which would increase possible pathways for groundwater to reach the surface. Therefore, engineered solutions will mitigate the risk of groundwater flooding.

7.77 The proposed SuDS include permeable paving, rain gardens and detention basins. These SuDS will be designed to provide amenity and biodiversity gains, as well as sufficient water quality treatment to protect the receiving sewers and groundwater. Surface water run-off from the Parcel A will be restricted to the Q1 greenfield run-off rate (1.335 l/s/ha) for all storm events up to and including the 1 in 100-year storm event plus 40% allowance for climate change.

7.78 A pragmatic approach to the design of the surface water drainage for Parcel B is proposed and this will continue to drain as per the existing greenfield condition. Exceedance flows have been designed to route away from building thresholds and towards less vulnerable areas.

7.79 The proposed redevelopment has an acceptable flood risk within the terms and requirements of the NPPF and complies with Core Policy 10 by effectively providing infrastructure improvements on Site and not increasing flood risk on Site or elsewhere.

Contaminated Land

7.80 The proposed development land is shown on historic maps to have been subject to gravel extraction and then infilled with what appears to be predominantly a mixture of natural deposits and construction and demolition waste, albeit there is limited evidence of the presence of asbestos from available site investigation data. The western boundary of the Site is recorded as landfill and the borehole logs for this area show a mixture of waste types in the ground.

7.81 The Site has been investigated in two phases of work, by Heathrow Airport Limited (HAL) in 2020 and by Ramboll in 2021; the latter in support of the applicant's acquisition of the site. Other than the infill activities the development land has been occupied more recently by airport car parking, HGV storage, metal fabrication, and a builders yard with refuelling equipment including 2 x decommissioned underground storage tanks.

7.82 The Site is located on a principal aquifer relating to the shallow river terrace gravels and on-site groundwater is likely to be in some form of hydraulic connectivity with the nearby Poyle channel that borders the north of the Site. Since 2021 Ramboll has undertaken groundwater and surface water monitoring and sampling in 2021, 2022 and on a quarterly basis in 2024.

7.83 In accordance with the government's land contamination risk management guidelines a staged approach to land contamination assessment will be followed including a desk study, GQRA, a remediation strategy and validation reporting where remediation is required. Ramboll has discussed the available data and the scheme with the Slough EHO and it was generally felt that contaminated land aspects would be manageable in the context of a data centre scheme.

7.84 The Site is considered to not be heavily contaminated though there is a degree of contamination that will need to be managed to improve the site conditions. In general terms there is the potential for ground contamination to exist associated with prior activities for example the landfill/infill and also two historical underground storage tanks in the north-east. The following remediation measures are due to involve:

- Capping the site to limit infiltration and limit the mobilisation of residual contamination in the ground;
- The removal of two underground storage tanks and associated refuelling infrastructures in the builders yard area;

- Assessment of gas risk and design appropriate gas mitigation measures for the building; and
- Taking any appropriate action in relation to unexpected finds (if identified).

7.85 The planning application submission is supported by a Phase 1 Preliminary Risk Assessment, Generic Quantitative Risk Assessment and Outline Remediation Strategy.

Airport Safeguarding

7.86 The Site lies approximately 2 km to the west of the western end of the northern runway at London Heathrow Airport, in an area subject to aerodrome safeguarding, the process by which airspace required for safe and efficient take-off and landing at airports is maintained free of new development. The application is supported by an Aviation Safeguarding Assessment.

7.87 Assessment has been undertaken of the Site's location in relation to London Heathrow Airport's height restrictions for flight path movements. The take-off climb surface at London Heathrow gives rise to the most constraining height limits across the site of between 62.4 m and 65.8 m above the proposed data centre footprint. The proposed 30 m high data centre is acceptable from an aviation perspective, and careful construction planning is required to ensure that cranes also comply with the aviation constraints.

7.88 In addition to the physical safeguarding of flight procedures, proposed development close to the airport has the potential to impact on-airport navigational aids. Preliminary assessment indicates that the proposed data centre is outside of the technical safeguarding frames indicated in Civil Aviation Authority guidance.

7.89 Design of external lighting is mindful of the requirements to ensure that lights are not dangerous, confusing or dazzling to pilots on approach or taking off from aerodromes. In addition to lights, PV panel installations or large glazed areas have all be considered to prevent glare towards pilots or ATC operators.

7.90 Overall, no harms arise from an airport safeguarding perspective.

Need for the Development

7.91 The need for the development is explained in full in Section 6 of this Statement

7.92 In summary, both local and national policy place significant weight on the need to support economic growth and productivity for development opportunities.

7.93 The NPPF sets out at paragraph 85 that planning decisions should help create the conditions in which businesses can invest, expand and adapt, and that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

7.94 Furthermore, NPPF 'Section 6 seeks to build a strong, competitive economy' to reference the delivery of commercial development to meet the needs of a modern economy through data-driven and high technology industries including data centres.

7.95 Data centres are critical functioning of SBC's businesses and while the space itself has a relatively low employment density compared to an office use, for example, these uses should be seen as "economic infrastructure" and therefore not just about direct jobs, but the critical role they play in creating, supporting and sustaining jobs in the rest of the economy, at both a local level, London-wide level and UK wide via international competitiveness.

7.96 As set out in Section 6, there is a significant and substantial demand for new data centres in the SAZ, and the provision of data centres makes a significant contribution to the UK economy. The application proposals would make a significant contribution to this need. Furthermore, BESS play an important role in facilitating renewable energy production and achieving UK objectives relating to net zero targets.

7.97 As described in the Alternative Site Assessment (summarised below), there is no alternative site in the SAZ currently available for the proposal to meet the specific requirements of this project – namely a location that is able to be served from both Iver and Laleham sub stations and can be delivered in time to meet the availability of the power connection in 2027.

Alternative Sites

7.98 There are a number of key drivers for the clustering of data centres within this area of West London, which are important to understanding why there is so much demand for data centres focused on this area and its criticality to the UK's economic success.

7.99 Historically the main driver was the fibre infrastructure, on the basis the location is one of the most fibre rich locations in the UK, due to its proximity to the Great Western Rail Line which houses the fibre ducts for a significant number of national and international telecommunications providers. In particular access to the subsea cables across the Atlantic.

7.100 Many of the operators in the sector located in the area as a consequence of this proximity to the fibre, along with the access to power. With the growth of Cloud Computing many of the Cloud Providers established their Availability Zones in the area for these reasons.

7.101 The Alternative Site Assessment that accompanies this application demonstrates that through an extensive and robust process of research and consultation, that there is a lack of supply of data centre sites to meet the demand for this type of critical infrastructure which is essential for the national and local economies.

7.102 Given the location of the site within the Green Belt, it is necessary to examine whether there are other available and suitable alternative sites to accommodate the proposed development, which is a material factor in the very special circumstances case.

7.103 There are significant power constraints in the local area which is limiting the ability to provide hyperscale data centres. However, critically the Applicant has contractually secured power from National Grid from the Laleham and Iver substations which have confirmed capacity for the application proposals. In this respect, the development is unique in that it has both the Site which is capable of meeting the requirements of the data centre market and has secured the power to actually deliver upon that requirement.

Economic Benefits

7.104 The proposed development will deliver a world-class data centre and BESS. It is expected to result in substantial economic benefits for the local area, London and the UK as a whole. It will strengthen Slough as a data centre cluster in London, and more broadly help to alleviate the supply constraints for the storage of data in London.

7.105 The UK Data Centre market amounts to 2,190 Mega Watts (MW) (£7.5bn turnover) in 2024 and is forecasted to reach 3,610 MW (£14.5bn) by 2029, a compound annual growth rate of 10.49% (14% by £ value).

7.106 Data Centres provide critical infrastructure to enable growth in the UK's Digital Economy and across all sectors in the economy that are data enabled – this includes sectors including financial services, healthcare, retail, telecom, and government centres. This has been recognised in National Policy through the existing National Data Strategy and NPPF.

7.107 Slough is a major UK Data Centre location with 379.23 MW of IT load capacity across 29 facilities, supporting a wide range of digital industries. The strength of Slough's digital economy is demonstrated by the fact that several innovation clusters (Artificial Intelligence, Clean Tech, Research and Consulting (Physical Science and Engineering) and Electronics Manufacturing) are expected to experience significant turnover growth, and are centred on, or envelop Slough. These clusters are drivers of innovation and productivity and create well paid employment opportunities. It is anticipated that over the next five years, the four aforementioned industries will achieve a compound growth rate between 4% to 27%. In 2024, the clusters had a combined turnover of £1.7bn.

7.108 Data centres are critical functioning of SBC's businesses and while the space itself has a relatively low employment density compared to office use for example, these uses should be seen as "economic infrastructure" and therefore not just about direct jobs, but the critical role they play in creating, supporting and sustaining jobs in the rest of the economy – at a local, London-wide and international level.

7.109 Based on the Homes & Communities Agency density guide, the proposed development with a data centre could generate between 30 and 220 full time equivalent (FTE) operational roles. However, based on Quod's prior experience on similar developments, we expect this scheme to generate approximately c.65 FTE operational roles. The total amount of jobs supported by the development will depend on the final design and layout of floorspaces and the nature of the occupier. It is anticipated that a high proportion of roles will be highly skilled and high wage jobs.

7.110 SBC's Core Strategy outlines that there is "an urgent need to improve the skills of Slough residents so that they will be able to obtain jobs in the new knowledge-based industries". In order to comply with local policy and ensure benefits are felt locally, the Applicant is committed to working alongside SBC to identify schools and colleges within Slough that would benefit from education programme funding, to support local access to and understanding of opportunities within the logistics and real estate sector. The Applicant will also engage with colleges, including Slough & Langley College for example. In addition, the development programme also operates a Community Benefit Fund for local community causes. The

Applicant is also committed to providing long-term employment opportunities for local residents.

7.111 Slough's digital sector contributes to the SBC's high level of productivity. The proposals will generate approximately £5.98m per year in Gross Value Added (GVA)[6,7], which measures the economic value of the employment supported by the development.

7.112 Data centres as outlined earlier, provide a critical function for the broader national, regional and local digital economies. The NPPF recognises that they have been designated as critical national infrastructure. A hyperscale data centre at the Site will provide indirect, catalytic and down-stream effects to the broader IT economic geography in the South East. At a regional level, a data centre and BESS will provide minimised latency, as well as support the thriving eco-system of data centres in London. At a local level, data centres will provide essential infrastructure to Slough firms, contributing to the functioning of the local economy. IT jobs directly account for 14% of the Slough economy, and approximately 1 in 10 jobs, however almost all sectors are reliant on it.

7.113 Construction will generate employment in the construction sector. It is expected an average of 430-490 full time equivalent jobs in any given month over the 14-15 month construction period (equivalent to 530 person years of construction).

7.114 Business rate revenue for SBC will be generated and paid by the occupiers of most non-domestic and business properties. The revenue generated in SBC will contribute towards the cost of local services in the area and benefit the broader community. It is anticipated that up to £3.56m in business rates will be generated annually and of that 45% will be retained by SBC.

7.115 Slough's strategic location, robust infrastructure, existing business environment and access to a skilled workforce make it an attractive location for data centre operations. The proposals will strengthen Slough as a data centre cluster, and will also deliver a BESS facility, which will help to address power supply constraints in the local area and provide resilience to the local network.

7.116 The Economic Statement submitted with this planning application sets out the benefits in further detail.

[6] GVA is the value generated by any unit engaged in the production of goods and services.
[7] Calculated based on the c. 65 FTE operational jobs generated. Accompanying Economic Statement prepared by Quod submitted with Planning Application

8 Very Special Circumstances Case

8.1 the Site is 'grey belt' land. This plain to see from the submitted evidence. In summary, the Site fails to make a strong contribution to purposes a, b and d of the Green Belt; there are no footnote 7 issues; the development does not fundamentally undermine the remaining Green Belt; it addresses a demonstrable unmet need and is a sustainable location. As a result and in compliance with footnote 55, the proposals do not represent inappropriate development and therefore, very special circumstances are not required to justify the application proposals.

8.2 Even if the Site was not considered to be grey belt (which for the reasons explained in this Statement is not accepted), the proposed development on the Site would not undermine the purpose of the Green Belt.

8.3 in accordance with Paragraph 153 of the NPPF, the proposals will only be considered appropriate where very special circumstances exist that demonstrate that the harm to the Green Belt, and any other harm resulting from the proposals, is clearly outweighed by other considerations. In this context, the proposed development will result in a minimal level of harm to the Green Belt. This is principally due to the existing industrial activities which result in the land underperforming and making a limited contribution to the role, function and the purposes of the Green Belt.

8.4 In this context, it is considered that a series of very special circumstances associated with the proposed development exist to clearly outweigh the low levels of harm created:

- There is a clear and urgent need for data centres and BESS, both of which are considered to be critical infrastructure of national importance.
- Contribution to the global incentive to reduce greenhouse gas emissions, and the national incentive to increase energy security through the delivery of battery storage facilities to support renewable energy schemes, as per paragraph 165 of the NPPF.
- It is expected to result in substantial economic benefits for the local area, by providing:
  - up to 490 FTE construction jobs
  - c.65 FTE operational jobs
  - a GVA of £5.98 million
  - £3.5 million business rate revenue to Slough Borough Council.
- Within the context of the need for the uses proposed, there are clear locational advantages to the Site in meeting that need within the Slough Availability Zone. The Slough Availability Zone is critical the economic success of London, and therefore the UK. Failure to delivery additional data centre capacity in this location will not only materially impact economic growth in Slough (IT related jobs directly account for 14% of the Slough economy - approximately 1 in 10 jobs), but significantly UK economic growth
- The Alternative Sites Assessment that will be submitted in support of the planning application provides evidence that there are no suitable and available alternative sites.

- The proposals will provide diverse, high-quality jobs within the technology sector to ensure that Slough residents are able to benefit from the economic activity that takes place within the borough.
- The Site is poor quality Green Belt, and the northern parcel is previously developed land, within the wider context of the Industrial Estate. Within the context of the NPPF, the Site would be classified as 'grey belt', where development would not be considered in appropriate.
- The redevelopment of the northern parcel of land represents the re-use of previously developed land in accordance with the Government's ambition to make effective use of land to meet development needs.
- The Site is not visually sensitive as there is existing landscaped boundaries, and proposed enhanced landscaping, that will screen the application proposals from the wider area.
- The development of the site is not considered to have a significant impact on the openness of the Green Belt owing to existing natural screening from public view, which is enhanced through the proposed development.
- The development of the northern parcel of land will result a significant visual improvement compared to the open-air storage and industrial activities the currently occur.
- The proposed development has a high-quality design, adopting a best-in-class approach to the delivery of data centres, raising the bar for those the follow behind.
- The development will result in a reduction in vehicular trips compared to the activity currently permitted on site.
- Reduced CO2 emissions associated with the use of cloud services in data centres, which is more energy efficient than office based or small datacentre infrastructure.
- The application proposals includes enhancements to biodiversity and improved accessibility to existing green space and will achieve on Site Biodiversity Net Gain in excess of 10%.

8.5 In light of the above, the benefits associated with the application proposals are considered to clearly outweigh the low levels of harm to the Green Belt.

9 Conclusions

9.1 This Statement has been prepared in support the submission of a planning application to Slough Borough Council in relation to the redevelopment of land at Manor Farm, Poyle Road for a hyperscale data centre and battery energy storage facility.

9.2 This Planning Statement sets out the pressing need for the development due to the importance of both data centres and battery energy storage as critical national infrastructure, and the locational advantages to the site in the context of that need. Parcel A currently contains a mix of intensive industrial activities, and as a result the coordinated redevelopment of the site for a data centre will provide significant visual enhancements, as well as ecological and landscape improvement, improved accessibility to existing green space and reductions is traffic.

9.3 The Site is 'grey belt' land and its development would not be considered inappropriate. The NPPF supports of development of grey belt land that meets need. It also specifically highlights the importance of 'data-centres' and their contribution towards the growth of key industries and a competitive economy.

9.4 Even if it were concluded that the Site is not grey belt, it fundamentally underperforms against Green Belt purposes. The very limited Green Belt (and other) harm attributable to the proposed development is heavily outweighed by the identified series of very special circumstances that arise. Significant weight should be afforded to the development proposals that support economic growth and facilitate low carbon energy development and grid resilience, as well as provide various landscape and ecological enhancements that can be facilitated to the wider Colne Valley Regional Park.

9.5 Slough's strategic location, robust infrastructure, existing business environment and access to a skilled workforce make it an attractive location for the proposed development. The proposals will meet an identified pressing national need for critical infrastructure, strengthen Slough as a data centre cluster, and will also deliver a BESS facility, which will help to address power supply constraints in the local area and provide resilience to the local network.