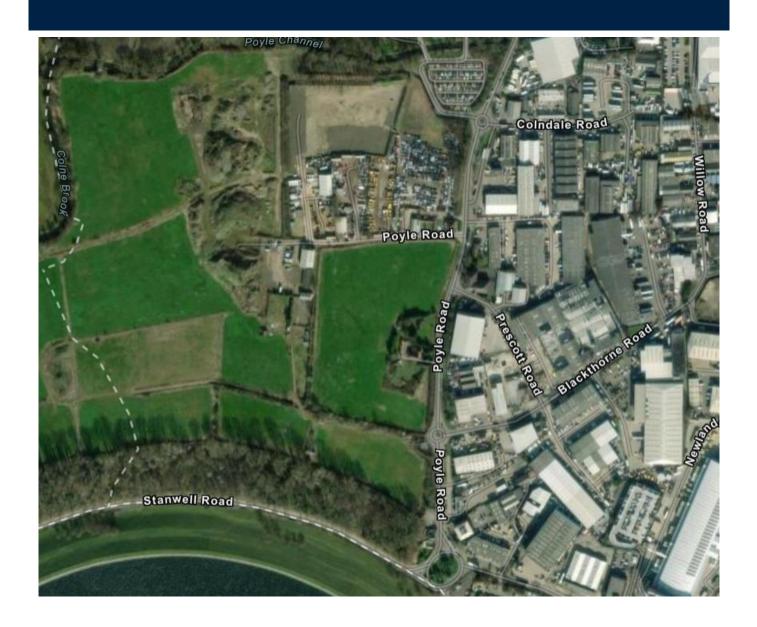


**Alternative Sites Assessment** 



### **Alternative Sites Assessment**



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#### **Alternative Sites Assessment**



### 1. Introduction

1.1. This Alternative Sites Assessment ("ASA") has been prepared by Savills on behalf of Manor Farm Propco Limited ("the Appellant") in relation to Manor Farm and land north of Wraysbury Reservoir (the "Appeal Site") to accompany a Planning Appeal Ref No: APP/J0350/W/25/3366043 (local planning ref. P/10076/013) (the "Appeal") for the redevelopment of the site for an employment scheme comprising a Data Centre (DC) and a Battery Energy Storage System (BESS) with associated works (the "Development"). 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 (BESS) 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.

- 1.2. A more detailed description of the development proposals is set out in the Appellant's Statement of Case submitted as part of the Appeal, as well as both the Planning Statement and the Design and Access Statement that accompanied the prior planning application (and which will be included in the Appeal's core documents list).
- 1.3. The Appeal Site extends to 8.16 ha to the west of Poyle Road, and is located within the administrative area of Slough Borough Council.
- 1.4. The Appeal Site is located to the immediate west of Poyle Industrial Estate across Poyle Road. The northern part of the Appeal Site formerly contained a series of industrial, storage and transportation uses. It is understood that at the time the planning application for the Development was submitted by the Appellant uses included:
  - HGV maintenance workshop;
  - Car parking and valet parking associated with Heathrow Airport;
  - Building, sand and gravel supplies;
  - Metal works welding.
- 1.5. The Appeal Site is located within the Slough Availability Zone for data centres. It is also designated within the Metropolitan Green Belt, the Colne Valley Regional Park, within the Horton and Wraysbury Lowlands Landscape Character Area. Core Policy 1 of the adopted Slough Local Plan also describes land between Slough and Greater London as being part of a 'Strategic Gap'. Core Policy 2 states that development will only be permitted in the Strategic Gap 'if it is essential to be in that location.'
- 1.6. With regard to the Appeal Site's location within the Colne Valley Regional Park, it is noted that designated industrial areas nearby such as Poyle Trading Estate, is also within this area.
- 1.7. Whilst the Local Plan's Policy Map suggests that the Appeal Site is liable to flooding, updated maps from the Environment Agency make it clear that the Appeal Site is within Flood Zone 1.

#### **Alternative Sites Assessment**



#### The Purpose of the ASA

Green Belt and Very Special Circumstances

- 1.8. Paragraph 142 of the National Planning Policy Framework (NPPF) (February 2025) explains the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential characteristics of the Green Belt is its openness and permanence. The purpose of the ASA is to demonstrate that there are no alternative sites which can accommodate the proposed development on land that ought to be given priority as set out in paragraph 148 of the NPPF.
- 1.9. Paragraph 154 of the NPPF states that development is 'inappropriate' in the Green Belt unless a specified exception applies. Paragraph 153 explains that 'inappropriate' development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances ("VSC"). The NPPF does not offer a formal definition of VSC, and it is therefore the decision maker's responsibility to apply an appropriate planning balancing exercise. The NPPF explains that VSC will not exist unless potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 1.10. The VSCs for the Development are set out in the Appellant's Statement of Case prepared in support of the Appeal. Whether there are any potential alternative sites that could accommodate the Development (in whole or in part) is material to the VSC case.
- 1.11. It is worth noting that decision makers are not required to consider alternatives sites under either legislation or policy. An ASA is not in itself a formal 'test' of the Development Plan and the availability or otherwise of alternative sites upon which a proposed development could be located is immaterial to the planning merits of that proposal. However, in a judgment handed down in April 2017<sup>1</sup>, Holgate J stated that 'where the proposal would have substantial adverse effects which are said to be outweighed by the need for the development, then the availability of alternative sites upon which that need could be met with less harm may well be relevant.'
- 1.12. The context of the Development is different to the proposal that was the subject of the judgment noted above, in that it will not result in substantial adverse impacts as set out in the Appellant's Statement of Case. However, in light of the Appeal Site being designated within the Green Belt, the Colne Valley Regional Park, and the Strategic Gap an Alternative Site Assessment has been prepared to consider whether any appropriate alternative sites exist. As explained further in Section 4, this ASA focuses on the data centre component of the Development only.

<sup>&</sup>lt;sup>1</sup> Goodman Logistics Developments (UK) Limited v SSCLG & Slough Borough Council [2017] EWHC 947 (Admin) at §55

#### **Alternative Sites Assessment**



Scale of Need

1.13. Alongside whether there are suitable alternative sites to accommodate the Development, is the question of need for the Development itself. Paragraph 85 of the NPPF is clear 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

- 1.14. Paragraph 87 was revised in December 2024 (with the NPPF since updated again in February 2025) to establish that planning decisions should recognise and address specific locational requirements for specific sectors. This includes at limb (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).
- 1.15. The scale of need for cloud and hyperscale data centres within Slough has been well established in recent Secretary of State planning decisions as well as at the local level. That such need within the Slough AZ is being driven by cloud and hyperscaler operators informs the scale of data centre developments coming forwards and in turn site requirements. The most recent articulation of the scale of data centre need in the Slough AZ by the Secretary of State was given in her decision to approve the recovered appeal at Woodlands Park on 9 July 2025 (ref. 3347353):

The Secretary of State agrees with the undisputed position that need within the Slough Availability Zone (SAZ) has continued to rise significantly, from a short to medium term need of 1700MW identified in the Court Lane decision to a mid-range estimate of some 2,486MW of additional capacity needed between 2024 and 2029, which will continue to rise to some 2,858MW

1.16. This ASA should be read in conjunction with all other documents and drawings submitted in support of the Appeal including further evidence on need prepared by Savills Economics.

#### Structure of the ASA

- 1.17. Following this introduction, section 2 sets out the methodology used in the ASA. The subsequent sections then apply the methodology and show the results of the ASA as follows:
  - Section 3 sets out the Area of Search;
  - Section 4 establishes the Site Size:
  - Section 5 reviews sites for their suitability;
  - Section 6 provides a detailed assessment of potentially suitable sites
  - Section 7 sets out the conclusion of the ASA.

#### **Alternative Sites Assessment**



1.18. As this ASA shows, there are no suitable alternative sites that are (individually or in combination) capable of addressing the established need for data centres within the Slough Availability Zone in the timescale required.



#### **Alternative Sites Assessment**



# 2. Methodology

2.1. This section outlines the search and assessment criteria that have been used to carry out the ASA.

#### **Defining the Search Criteria**

- 2.2. The proposed development of employment floorspace is intended to contribute towards meeting a specific and unmet need within the defined area of search. Within this area of search, the suitability and relative preferability of a potential site shall depend on whether the site:
  - meets the specific operational requirements of the end use(s); and
  - is sequentially preferable in terms of its impact upon the Green Belt and the Strategic Gap.

#### Applying the Planning Balance

2.3. This ASA identifies any sites which are suitable alternatives, having regard to relevant site requirements and suitability, as set out below.

#### Stages of Assessment

2.4. The ASA is carried out over four stages. An overview of each is summarised below:

#### Stage 1: Area of Search and Evidence Base

2.5. This stage identifies the defined Area of Search for the ASA, as well as the evidence base being used to source the list of sites.

#### Stage 2: Minimum Site Requirements

2.6. This stage establishes whether the available sites meet the minimum size and shape requirements for the proposed development, to provide a shortlist of potentially suitable sites which will be assessed further.

#### Stage 3: Site Suitability Assessment

2.7. This stage considers a range of additional factors, specific to the proposed DC use, to establish an alternative site's ability to deliver a comparable scheme.

#### Stage 4: Further Assessment and Site Comparison

- 2.8. Should any sites pass Stages 1-3 of assessment, further assessment will take place to establish which site is sequentially preferrable when all material considerations are taken into account.
- 2.9. Further detail regarding the methodology for each stage of assessment is set out below.

#### **Alternative Sites Assessment**



#### Stage 1: Area of Search and Evidence Base

- 2.10. Stage 1 identifies the defined Area of Search, as well as the sources of supply in each LPA's evidence base.
- 2.11. The full list of sites was sourced from a review of a number of evidence base documents across the site search area spanning several Local Planning Authorities, as set out below:

#### Slough

- Slough Brownfield Land Register 2019
- Slough Local Development Framework Site Allocation 2010

#### Hillingdon

- Hillingdon Brownfield Land Register 2020
- London Borough of Hillingdon Local Plan Part 2 Site Allocations and Designations (January 2020)
- Hillingdon Employment Land and Capacity Study December 2023

#### Royal Borough of Windsor and Maidenhead

- Royal Borough of Windsor and Maidenhead Housing and Economic Land Availability Assessment September 2019
- Edge of Settlement Part 1 Green Belt Purpose Assessment July 2016
- Edge of Settlement Part 2 Green Belt Purpose Assessment July 2016
- Green Belt Purpose Analysis November 2013
- Green Belt Boundary Study December 2013
- Brownfield land sites 2017

#### **Buckinghamshire Council**

- Buckinghamshire Housing and Economic Land Availability Assessment Methodology Consultation Draft (June 2022)
- Buckinghamshire Brownfield land Register (2024)
- Buckinghamshire Call for Sites 2021-2023
- Buckinghamshire Green Belt Assessment (March 2016)

### London Borough of Hounslow

- London Borough of Hounslow Site Allocations and Capacity Assessment August 2024
- London Borough of Hounslow Employment Land Review Update July 2024
- LBH Green Belt Review Stage 1 April 2015
- LBH Green Belt Review Stage 2 June 2019

#### **Ealing**

West London Employment Land Review August 2022

#### **Alternative Sites Assessment**



- West London Employment Land Evidence Report May 2019
- Strategic Housing Land Availability Assessment (SHLAA) London Wide 2017
- Green Belt and Metropolitan Open Land (MOL) Review Stage 1 (November 2022)
- Green Belt and Metropolitan Open Land (MOL) Review Stage 2 (February 2024)
- Ealing Brownfield Land Register 2017

#### **Spelthorne**

- Employment Land Needs Assessment May 2022
- Site Selection Methodology Update January 2022
- Draft Local Plan Reg 19: Site Allocation Officer Site Assessment June 2022
- Draft Local Plan Reg 19: Discounted Alternative Site Allocations Officer Site Assessment June 2022
- Brownfield Land Register 2024
- Strategic Land Availability Assessment 2022

#### **Bracknell Forest**

- Employment Areas Assessment December 2020
- Landscape Sensitivity Appraisal of Potential Housing and Employment Sites in Bracknell Forest February 2018
- Bracknell Forest Strategic Housing and Economic Land Availability Assessment (SHELAA) viability Assessment July 2017
- Brownfield Register 2024
- Bracknell Forest and Wokingham Borough Joint Green Belt Review Main Report (June 2016)

#### Richmond

- Richmond Individual Site Assessment 2015
- London Borough of Richmond Upon Thames Green Belt Assessment August 2021
- Brownfield Land Register Richmond February 2023

#### Stage 2: Minimum Site Requirements

2.12. Stage 2 establishes whether the available sites meet two minimum site requirements – site size and site shape. Each criterion is described in full in Section 4, but the table below provides an overview of the indicators applied to each criterion.

Criteria	Comments	Indicator	Score
Site Size	In order to accommodate the Data Centre component	Site is 5.8 ha or more	
	of the Development , a site must be at least 5.2 ha.	Site is between 5.2 and 5.8 ha	
		Site is below 5.2 ha	

#### **Alternative Sites Assessment**



Criteria	Comments	Indicator	Score
Site Shape and Topography	A broadly rectangular shaped site capable of	Regularly shaped and flat	
	accommodating the proposed Data Centre, alongside associated works	Regularly shaped, with minor topographical anomalies	
		Irregularly shaped and/or with major topographical anomalies.	

- 2.13. Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 3. Sites which have an 'Amber' score will be considered less preferential but will be carried forward for further assessment at Stage 3.
- 2.14. All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 2 assessment.

#### Stage 3: Site Suitability Assessment

- 2.15. Stage 3 considers a range of more detailed factors, to establish the overall suitability of a potential site to accommodate the data centre element of the Development. This stage of assessment draws upon publicly accessible information, including aerial photography, development plan documents and associated evidence base libraries.
- 2.16. Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 4. Sites which have an 'Amber' score will be considered less preferential but will be carried forward for further assessment at Stage 4. The table below summarises the indicators to be applied for each criterion:

Criteria	Comments	Indicator	Score
Proximity to Sensitive Uses	Cloud and hyperscale data centres require physical	Site is not close to incompatible land uses.	
	separation from sensitive uses such as residential, care homes, schools and colleges, and	Site is close to sensitive uses, but can be suitably mitigated.	
	hospitals. The compatibility of other uses shall be categorised accordingly having regard to any mitigating circumstances (e.g. buffer zones) which may be present or capable of inclusion.	Site is close to sensitive uses and cannot be suitably mitigated.	
Visual Impact	Depending on the site specifics, whether the data centre	Site is unconstrained and not subject to visual sensitivities	
	development would lead to an unacceptable impact on visual amenity.	Site is constrained, but visual impact can be reasonably mitigated	
	antenty.	Site is constrained, and visual impact cannot be reasonably mitigated	

#### **Alternative Sites Assessment**



Criteria	Comments	Indicator	Score
Environmental Designations	Sites should not be located in areas where there are	Site has no environmental constraints.	
	environmental designations (e.g. landscape and ecological designations, heritage, air	Site has environmental constraints, but can be satisfactorily mitigated.	
	quality, TPO, SSSI, historic use) where the impact of development cannot be adequately mitigated (physically or viably).	Site has environmental constraints, and cannot be satisfactorily mitigated	
Flood Risk	Sufficient net developable area must be located within areas with a low probability of	Site is entirely contained within Flood Risk Zone 1	
	flooding. The built form cannot be located in flood zone 2 or 3.	Part(s) of the Site are within Flood Risk Zones 2 or 3, but can be mitigated or are outside the area required for built development.	
		Built development would be located in flood zone 2 or 3	
Access Arrangements	A key occupier requirement for cloud and hyperscale data centres is that they provide two	Site already has two clearly separate points of access.	
	separate points of access in order to ensure the appropriate level of resilience	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
	, comment	Site does not have two separate points of access, and there is no potential to satisfactorily provide them.	
Ownership	Cloud and hyperscale data centres should be on land in single ownership or control to	Site has a single owner.	
	minimise the inherent risk and protracted negotiations with	Site has between two and four owners.	
	parties who have competing priorities.	Site has at least five owners.	

- 2.17. Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 4. Sites which have an 'Amber' score will be considered less preferential but will be carried forward for further assessment at Stage 4.
- 2.18. All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 3 assessment.

#### **Alternative Sites Assessment**



#### Stage 4: Further Assessment

- 2.19. Should any sites pass Stages 1-3 of assessment, further qualitative assessment will take place to establish which site is sequentially preferrable when all material considerations are taken into account. Such material considerations may include, but are not necessarily limited to:
  - The proportion of a site that does not form part of the Green Belt;
  - The proportion of a site that constitutes land that is considered to be brownfield or is otherwise developed;
  - Whether there are any adopted site allocations or planning permissions which support the development of all or part of a site;
  - Whether there are any draft site allocations or live planning applications proposing the development of all or part of a site;
  - Whether there are any site-specific constraints which may adversely affect the ability of the site to meet detailed operator requirements; and
  - Whether there are any material considerations which are likely to exclude the development of the proposed use.
- 2.20. All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 4 assessment.

#### **Alternative Sites Assessment**



# 3. Stage 1 - Area of Search

- 3.1. This alternative site assessment identifies an Area of Search that is appropriate for Data Centre element of the Development. An area of search for data centre sites has conventionally been defined by proximity to three things:
  - Connection to power;
  - Connection to dark fibre; and
  - Connection to nearby DCs.
- 3.2. The table below sets out these three metrics, and how they have been applied in a number of other recent data centre ASAs, alongside this one.

Alternative Site Assessment	Proximity to Power	Proximity to AZ	Proximity to Fibre
Woodlands Park	✓ 5km	<b>√</b> 10km	<b>√</b> 10km
Abbots Langley	X	<b>√</b> 8km	X
South Mimms	<b>√</b> 10km	<b>√</b> 20km	X
Manor Farm (Appeal Site, this ASA)	<b>√</b> 10km	✓ 10km	X

3.3. Our parameters for defining the Area of Search are set out below. We have been instructed that the Appeal Site is located in an area that is rich in fibre, and therefore fibre need not be included as a constraint in this ASA.

#### **Connection to Power**

- 3.4. Both a DC and a BESS requires a connection to a 132kv Grid Supply System (GSP). The only such points with appropriate proximity to the Slough Availability Zone (see further commentary on the Slough AZ below) are at the Iver and Laleham substations.
- 3.5. Owing to degradation of power over distance, both a DC and a BESS become more complex and less viable to operate the further they are from a grid connection. The established maximum distance is 10km. This has been adopted by other ASAs for DCs, and has been accepted at appeal and by the Secretary of State<sup>2</sup>.

<sup>&</sup>lt;sup>2</sup> Land East of South Mimms. Permission for Data Centre comprising up to 187,000sqm in Metropolitan Green Belt. Permission granted by Hertsmere Borough Council (subject to s.106) on 12 February 2025. Planning application reference: 24/1152/OUTEI

Woodlands Park Landfill Site. Application for Data Centre comprising up to 72,000sqm in Metropolitan Green Belt. Application refused by Buckinghamshire 25 June 2024. Appeal recovered and allowed on 09 July 2025. Planning application reference: PL/24/0754/OA.

#### **Alternative Sites Assessment**



- 3.6. Owing to power constraints, the Appeal Site requires two points of connection to the national grid: one at the Iver GSP and the other at the Laleham GSP. However, notwithstanding the capacity limitations at Iver and Laleham, the ASA has adopted the conservative assumption that a single grid connection from either Iver or Laleham can be achieved.
- 3.7. With regard to power, we have therefore applied a limit of no more than 10km from a 132kV GSP substation.

#### Proximity to Availability Zone

- 3.8. A key locational requirement of cloud and hyperscaler DCs is that they are located close to other DCs in clusters or groups of inter-reliant semi-independent DCs, known as Availability Zones (AZs). The critical concern for DC operators is ensuring that latency (the time it takes for data to travel from one point to another) is as low as possible. The lower the distance between DCs, the lower the latency between them. DCs connect to both the wider network and each other via fibre optic cables. In this way, AZs enable mutual cross support in the event of a DC loss by providing the capability for a DC to be replaced (instantaneously) when a failure arises.
- 3.9. AZs are not delineated geographically but have broad characteristics:
  - a group of DCs (usually at least three) connected over a redundant, high speed, low latency private link:
  - physically and infrastructurally separate from other AZs; and
  - a DC cannot be part of more than one AZ.
- 3.10. A single AZ provides a certain quantity of IT load (measured in MW), distributed across multiple DCs, with a large amount of resilience built in via active redundancy. The need for very high reliability drives parent-child and load balancing arrangements.
- 3.11. In recent data centre planning appeals, ASAs which have considered a single AZ (as opposed to multiple AZs within a region) have been found to be sufficient for establishing a lack of alternative sites.
- 3.12. In the appeal decision at Court Lane Industrial Estate<sup>3</sup>, the Secretary of State agreed with the Inspector who had recognised the evidence, put forward by the appellant, that other AZs around London were not able to cater to the same market as Slough:

Whilst there are other 'availability zones' around London, neither the North Acton Availability Zone (which tends to host gaming applications) or The Docklands Availability Zone (which tends to serve financial customers) would necessarily be able to cater for cloud computing services.

<sup>&</sup>lt;sup>3</sup> Court Lane Industrial State. Application for Data Centre comprising up to 65,000sqm in the Metropolitan Green Belt. Application refused by Buckinghamshire 17 October 2023. Appeal recovered and allowed 06 December 2024. Planning application reference: PL/22/4145/OA

#### **Alternative Sites Assessment**



3.13. In the appeal decision at Abbots Langley<sup>4</sup>, the Secretary of State agreed with the Inspector who had acknowledged that each AZ is operationally separate, and it is not possible to consider them interchangeably. Need within one AZ can only be met by increasing the available supply of IT load within that specific area:

Within the AZ, data will continuously and in real-time be transmitted between data centres to carry out processing operations and ensure that services can be provided seamlessly to customers without delay. Moreover, if connectivity at one data centre within the AZ is breached, other data centres within the AZ are able to 'kick-in' and provide continued service delivering near 100% uptime. This creates a tight radius within which additional sites can be located to allow the expansion of the AZ through the addition of new data centres. If the sites are not within this distance, the AZ is not able to function, services would experience lag and the likelihood of a fault or disruption is high. **Demand for additional services from a particular zone can therefore only be met within that AZ.** 

However, whilst this means that – for example – Slough, Hayes or Docklands need to continue to grow in order to meet the need and demand, this is not instead of, or at the expense of another AZ, such as Hemel Hempstead. In this respect, sites outside of the Hemel Hempstead AZ and sites within other AZs do not address the specified need in Hemel Hempstead in order to create a balanced load.

Given the scale of need across the London Availability Region, and the need for load balancing to work efficiently, I consider that the Alternative Sites Assessment was justified in only looking at sites within the Hemel Hempstead AZ. (emphasis added)

3.14. An assessment that focusses on a single AZ was also supported, and found to strengthen the planning case, in the allowed appeal at Woodlands Park referenced above (which was in the Slough AZ), that followed an earlier dismissed appeal at the same site:

For the reasons given at IR8.48-8.50, the Secretary of State agrees that no alternative sites are available. On the basis of the evidence before her in this case, which unlike Woodlands 1 relates to need within the SAZ rather than including need more broadly, she considers that lack of alternative sites should carry significant weight. (emphasis added)

3.15. The Inspector for the allowed Woodlands Park appeal came to the same point:

Here, given there is an undisputed urgent and overwhelming need for additional capacity in the SAZ, the acceptance that this need cannot be met in another AZ, and that Data Centres, are categorised as Critical National Infrastructure, these factors combine to justify attaching substantial positive weight to the lack of alternative sites. (emphasis added)

3.16. The key AZ cluster in the region is centred on Slough Trading Estate. DCs in this Zone have been developed on available brownfield land on established industrial sites.

<sup>&</sup>lt;sup>4</sup> Bedmond Road, Abbots Langley. Application for Data Centre comprising up to 84,000 sqm in the Metropolitan Green Belt. Application refused by Three Rivers 25 January 2025. Appeal recovered and allowed 12 May 2025. Planning application reference: 23/1068/OUT

#### **Alternative Sites Assessment**



- 3.17. The accepted maximum cable length connecting DCs within an AZ is 20km. However, obstacles and constraints arising during construction mean that cables are rarely laid down in a straight line. In order to guard against unforeseen complications during construction, the geographical distance is often shorter. The Woodlands Park ASA set a maximum preferred distance of 10km, and Abbots Langley 8 km. This methodology was accepted at both appeals.
- 3.18. It is noted that the ASA for South Mimms set a distance of 20km, however, this is considered beyond the limit of a practically viable distance, especially in an area as constrained by development as Slough (where cable routing is likely to be far more complex). A crow-flies distance of 10km was used for the Woodlands Park ASA and (unlike the South Mimms ASA) was tested at appeal and found to represent a strong approach. Accordingly, 10km has been applied in this ASA.

#### Fibre Availability

- 3.19. Another key locational requirement of hyperscale DCs is proximity to dark fibre: unused (unlit, hence 'dark') fibre optic cable that is used to connect a DC to the rest of the internet. DCs must be as close as possible to dark fibre to reduce latency. Slough has emerged as a key location for DCs because of its proximity to fibre links connecting London (and Europe) to the U.S.A. In this, the area is unique to the UK. In so far as the Slough AZ is close to London as a major financial centre, it is unique to Europe. Slough has 'Europe's largest collection of data centres.'5
- 3.20. The ASA prepared by Stantec for the South Mimms application<sup>6</sup> set a preferred distance of 5km, and an absolute maximum of 10km from a dark fibre connection. South Mimms is not in the Slough AZ.
- 3.21. We have been instructed that the availability of fibre in the area of the Appeal Site is sufficiently plentiful that we need not identify this as a constraint for the purposes of establishing an Area of Search.

#### Concluding Comment on Broad Area of Search

- 3.22. Based on the preceding assessment, we have used an area of search that is:
  - within 10km of the central point of the Slough AZ (i.e. Slough Trading Estate);
  - within 10km of a 132kV GSP substation.
- 3.23. We consider that this is a robust methodology and show the site search area considerations below.

<sup>&</sup>lt;sup>5</sup> Why is this town Europe's largest data centre hub? (BBC News, 21 May 2024, https://www.bbc.co.uk/news/articles/cyrl7nlnkjpo)

<sup>&</sup>lt;sup>6</sup> Land East of South Mimms. Permission for Data Centre comprising up to 187,000sqm in Metropolitan Green Belt. Permission granted by Hertsmere Borough Council (subject to s.106) on 12 February 2025. Planning application reference: 24/1152/OUTEI



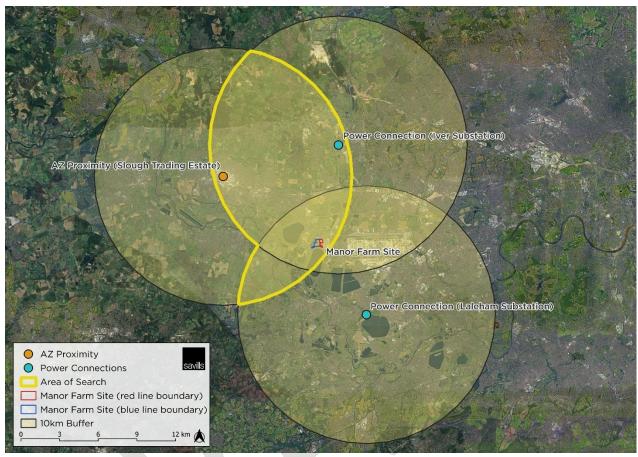


Figure 1: Area of Search, calibrated with 10km radii for nearby AZ core and GSPs

3.24. The Woodlands Park ASA referenced above states they have taken a 10km area of Search from the centre of the Slough AZ. The area that they show in their Area of Search map is shown below, superimposed over Savills Area of Search:



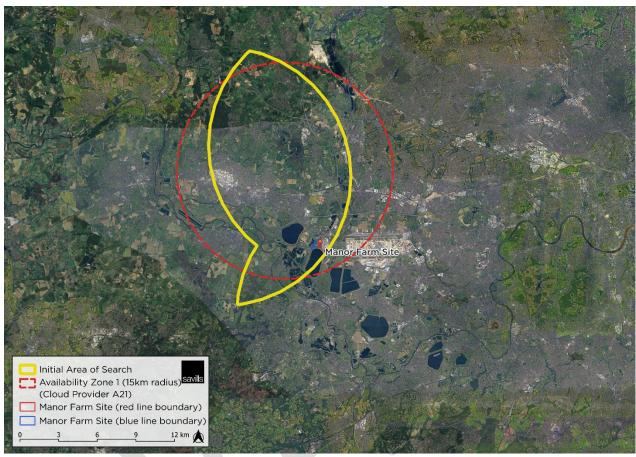


Figure 2: Savills Area of Search (yellow) with Woodlands Park's ASA for Slough AZ (red)

3.25. For robustness, we propose to incorporate most of the Woodlands Park Area of Seach (shown in red in Fig. 2), despite it being more than 10km (the preferred minimum distance) from the Slough AZ. Owing to the fact that a suitable power connection cannot be sourced to the west of the Savills Area of Search (shown in yellow of Fig. 2) this portion of the Woodlands Park Area of Seach has been discounted. The final Area of Search is shown in Fig. 3 below.





Figure 3: Final Area of Search





# 4. Stage 2 - Site Size and Shape

#### Minimum Site Size

- 4.1. The Development is for a DC and BESS on a site of approximately 8.16 ha.
- 4.2. However, for reasons set out below, this ASA adopts the conservative approach of assessing a 'DC only' only scheme. The amount of land used for the DC is 5.8 ha on what is a highly efficient and rationalised layout. To ensure robustness, a tolerance of -10% of the site area will be applied. It is considered to be extremely unlikely that the proposal could be accommodated on a site that is 10% smaller (giving a minimum of 5.2 ha), especially as, based on the proposed development, the 5.2 ha doesn't include a secondary access. However, to ensure that the most robust approach possible is taken, this approach has nevertheless been applied.
- 4.3. The DC portion of the site presents a compact layout, comprising a three-storey design that requires significantly less land than that for a two-storey scheme providing the same level of IT load.

#### Disaggregation

- 4.4. The NPPF does not provide any specific guidance regarding the consideration of alternative sites for industrial uses, however case law has established firm principles on the approach.
- 4.5. Paragraph 29 of the Supreme Court Decision in *Tesco Stores Limited v Dundee City Council* (March 2012) provides clarity on demonstrating flexibility in the consideration of alternative sites and states that it is whether any alternative site would be "suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site".
- 4.6. This premise was reiterated in the Rushden Lakes Secretary of State Appeal Decision (APP/G2815/V/12/2190175) dated June 2014, which, at paragraph 8.45 of the Inspector's Report, states:

In summary, it establishes [a] that if a site is not suitable for the commercial requirements of the developer in question then it is not a suitable site for the purposes of the sequential approach; and [b] that in terms of the size of the alternative site, provided that the Applicant has demonstrated flexibility with regards to format and scale, the question is whether the alternative site is suitable for the proposed development, not whether the proposed development could be altered or reduced so that it can be made to fit the alternative site.

#### Potential to Disaggregate Scheme

4.7. The Appeal scheme to which this ASA relates comprises a DC and a BESS, with associated works relating to the operation of both elements. Savills understands that it is a condition of the grid offer, secured between the National Grid and Tritax, that any network connection to Manor Farm supporting the DC requires the BESS to be delivered. It is therefore not possible to deliver a DC on this site, under this grid offer, and within this timeframe, without delivering a BESS as well.

#### **Alternative Sites Assessment**



- 4.8. Notwithstanding this, in order to ensure that the ASA case is as robust as possible, we have undertaken an assessment that considers a 'DC only' scenario, and have reviewed alternative sites in the context of a site size capable of accommodating the DC element of the scheme only. For this reason, we have set a minimum acceptable site size of 5.2 ha.
- 4.9. With regard to the DC itself, the issue of scale is critical to the efficiency of operation. The greater a DC's size, the greater its operational efficiency. Two DCs with 5,000sqm of floorspace each, for example, will not be able to provide the same IT load as one DC with 10,000sqm. It is therefore not possible to disaggregate the DC without increasing the overall land take for the same level of IT load. DC need in the Slough AZ is being driven largely by cloud and hyperscalers, and this itself informs the scale of developments, as these occupiers require units capable of accommodating large IT loads.
- 4.10. Savills understand that a DC cannot be delivered in this area without either awaiting planned improvements to the Grid, or facilitating a DC connection via a BESS. For this reason, delivering both constituent parts of the development is the only way to address the immediate and overwhelming need for DC capacity. As set out in the Appellant's Statement of Case submitted with the Appeal, the grid connections secured are capable of being operational by 2027, providing a unique opportunity for the Development to rapidly meet unmet need and avoid the significant constraints and delays to power supply being experienced in the West London area.

#### Stage 2 Conclusions

- 4.11. Taking into account only the DC aspect of the Development, and applying a robust flexibility of -10%, the minimum acceptable site size is 5.2 ha, where a site ought to be sufficiently regular in shape to allow a DC to come forward.
- 4.12. The identification of sites meeting this size requirement within the Area of Search is shown in the table below.

Site Name	Site Size (ha)	Site shape
188-216 Bath Road		
Area SE of Iver (west of M25)		
Area West of Denham Green		
Axis, Langley (south of Langley train station)		
Brett Aggregates, Slough		
Cemex Site, Iver		
Crown Plaza, Stockley		
East of Twinches Lane		
Former Akzo Nobel Site, Slough		
Former Colnbrook Landfill Site		
Heathrow Distribution Centre		
Land North of Allerds Road, Slough		
Court Lane Industrial Estate, Iver		
Land South of Hedgerley Lane		

#### **Alternative Sites Assessment**



Land South of Hollybush Lane	
Dromenagh Farm	
Land to the East of Bangors Road/East of M25	
Caldicott Prep School	
Link Park, Heathrow	
Manor Farm	
North of Langley train station	
Phase 4, Stockley Park	
Ridgeway Business Park	
SIFE	
Slough Trading Estate	
Thorney Business Park	
Wapsey's Wood Landfill Site	
West London Industrial Park, Iver Lane	
West of Iver Heath – SE of Five Points Roundabout	
West of Iver Heath (NE of Five Points Roundabout)	
Western International Market	
Wexham Springs	
Woodlands Park	
Land South of Slough Road	
Poyle Industrial Estate	
Land to the West of Pinewood Road	

4.13. Accordingly, the sites not taken forward into Stage 3 are Area SE of Iver (west of M25); Link Park, Heathrow; and East of Twinches Lane.



#### **Alternative Sites Assessment**



# 5. Stage 3 - Site Suitability

- 5.1. Operators of cloud and hyperscale DCs have specific operational requirements which a site must meet in order to be considered suitable. These include ensuring physical separation from sensitive uses and away from environmental designations that are likely to impact on the scheme. In addition, the visual impact of a hyperscale DC, which are buildings built at larger scales than normal commercial and industrial land uses ought to be considered when assessing site suitability. This section also considers Flood Zones, Access Arrangements, and Ownership Constraints.
- 5.2. The result of this exercise is shown in the table below:

Site Name	Proximity to Sensitive Uses	Visual Impact	Environmental Designations	Flood Zone	Access Arrangements	Ownership
188-216 Bath Road						
Area West of Denham Green						
Axis, Langley (south of Langley train station)						
Brett Aggregates, Slough						
Cemex Site, Iver						
Crown Plaza, Stockley						
Former AkzoNobel Site, Slough						
Former Colnbrook Landfill Site						
Heathrow Distribution Centre						
Land North of Allerds Road, Slough						
Court Lane Industrial Estate, Iver						
Land South of Hedgerley Lane						
Land South of Hollybush Lane						
Dromenagh Farm						
Land to the East of Bangors Road/East of M25						
Caldicott Prep School						
Manor Farm						
North of Langley train station						
Phase 4, Stockley Park						
Ridgeway Business Park						
SIFE						
Slough Trading Estate						
Thorney Business Park						
Wapsey's Wood Landfill Site						
West London Industrial Park, Iver Lane						
West of Iver Heath – SE of Five Points Roundabout						
West of Iver Heath (NE of Five Points Roundabout)						

#### **Alternative Sites Assessment**



Western International Market			
Wexham Springs			
Woodlands Park			
Land South of Slough Road			
Poyle Industrial Estate			
Land to the West of Pinewood Road			

5.3. The 13 sites that received a red for any one of the criteria were not carried forward. The remaining 20 sites were taken through to Stage 4.





# 6. Stage 4 – Site Assessment

6.1. This section provides detailed assessment of 20 potential alternative sites remaining after stages 2 and 3. For the purpose of this Stage, we have structured the Assessment to consider sites outside of the Green Belt first, followed by Green Belt sites. Stage 4 relates to the sites listed in the table below:

Green Belt Status	Sites
Outside Green Belt	188-216 Bath Road
	Axis, Langley (South of Langley Train Station)
	Former Akzo Nobel Site, Slough
	Heathrow Distribution Centre
	Slough Trading Estate
Green Belt Sites	Dromenagh Farm
	Manor Farm
	Thorney Business Park
	Western International Market
	Wexham Springs
	Former Colnbrook Landfill
	Land South of Hollybush Lane
	Phase 4, Stockley Park
	SIFE
	Woodlands Park
	Land South of Slough Road
	Cemex Site, Iver
	Land South of Hedgerley Lane
	Wapsey's Wood Landfill Site
	Land to the West of Pinewood Road

6.2. As these assessments demonstrate, there are no suitable and available sites within the Area of Search capable of meeting the level of identified need (alone or in combination) in the timescale necessary for the Development. Even with the delivery of approved and pending schemes, the need in the Slough AZ would still be overwhelming.

#### 6.3. **188-216 Bath Road**

- 6.3.1. The site is part of an Existing Business Area, and within the Slough Trading Estate Simplified Planning Zone, as defined as defined in the Slough Local Plan Proposals Map.
- 6.3.2. The site has a pending planning application for comprehensive redevelopment, and is therefore not considered to be available. This application, which seeks the demolition of existing buildings and the construction of two data centres, was reviewed by the Council's Planning Committee at their meeting on 29 May 2024, with a resolution to grant pending the completion of s106 agreement.
- 6.3.3. Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site for the data centre element of the Appeal scheme.

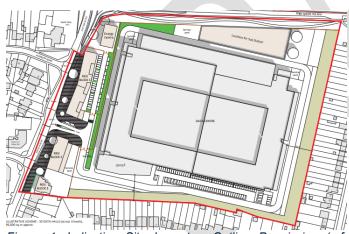
#### **Alternative Sites Assessment**

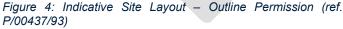


6.3.4. Even with the delivery of the scheme, there would still be overwhelming need for DCs in the Slough AZ, as set out in the Need Assessment prepared by Savills.

#### 6.4. Axis Langley, South of Langley Train Station

- 6.4.1. The site is part of an Existing Business Area, and a portion of the site is allocated for a proposed new supermarket as defined in the Slough Local Plan Proposals Map.
- 6.4.2. Outline planning permission (ref. P/00437/093) was granted 29 January 2021 for a single DC of up to 93,000 sqm, alongside an additional 9,650 sqm of floorspace to provide up to 60 dwellings, retail, and an energy centre. All pre-commencement conditions have been discharged, and work on the site has begun. The permission is therefore extant. More recently, an EIA Screening Request was submitted on 28 March 2024 for two DC buildings comprising up to 83,960 sqm. The indicative layouts of both proposals are shown in the images below.
- 6.4.3. Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site for the data centre element of the Appeal scheme.
- 6.4.4. Even with the delivery of the scheme, there would still be overwhelming need for DCs in the Slough AZ, as set out later in this Assessment.





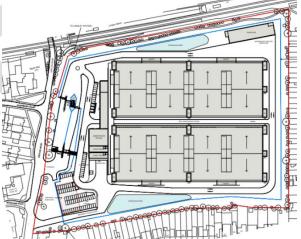


Figure 5: Indicative Layout - EIA Scoping (ref P/00437/995)

#### 6.5. Former AkzoNobel Site, Slough

6.5.1. The site is part of an Existing Business Area, as defined in the Slough Local Plan Proposals Map.

#### **Alternative Sites Assessment**



- 6.5.2. The site benefits from several planning permissions for comprehensive redevelopment, and is therefore not considered to be available.
- 6.5.3. Outline planning permission (ref. P/00072/096) was granted on 19 November 2020 for up to 1,000 dwellings and up to 71,535 sqm of DC use. Since then, Reserved Matters Applications have been approved for the full datacentre element of the scheme, absorbing both the available land and the datacentre allocation; the site is therefore not available for further DC development.
- 6.5.4. In addition, the portion of the site devoted to the residential element of the Outline has a pending application for a new datacentre (submitted by Equinix). This is for 90,614sqm of GEA DC.

Reference	Proposal	Date of permission	Comment
P/00072/096	Outline for up to 1,000 dwellings along with associated retail and leisure uses; and industrial development for B2, B8 and datacentre.	19 November 2020	Provision for up to 71,535 sqm of DC use.
P/00072/108	RMA for DC development comprising two datahalls.	12 October 2021	Provision for two data halls, totalling 42,237.7 sqm (GEA)
P/00072/139	RMA for DC development comprising one datahall.	14 August 2024	Provision of one datahall totalling 25,000 sqm (GEA
P/00072/152	Outline for DC development	Pending (validated 09 October 2024)	Covers the residential portion of permission P/00072/096 above.



Figure 6: Approved Parameter Plan for AzkoNobel Site (ref. P/00072/096). Showing Industrial portion in purple, and residential in green



Figure 7: Approved RMA schemes showing the two datahalls approved under P/00072/108 (Buildings A & B) and under P/00072/139 (Building C)

#### **Alternative Sites Assessment**



- 6.5.5. Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site for the data centre element of the Appeal scheme.
- 6.5.6. Even with the delivery of the scheme, there would still be overwhelming need for DCs in the Slough AZ, as set out later in this Assessment.

#### 6.6. Heathrow Distribution Centre

- 6.6.1. The site is part of an Existing Business Area, as defined in the Slough Local Plan Proposals Map. Core Policy 5 of the Core Strategy states that "there will be no loss of the defined Existing Business Areas to non-employment generating uses, especially where this would reduce the range of jobs available."
- 6.6.2. At present, the site is previously developed in full, and contains traditional I&L development. This includes a large-scale distribution centre understood to be occupied and operated by Royal Mail. To facilitate redevelopment the existing occupiers would require vacation and relocation. This includes for Royal Mail who occupy a largescale distribution centre.
- 6.6.3. The site is therefore considered not to be available for development, and is not a suitable alternative site for the data centre element of the Appeal scheme.

#### 6.7. Slough Trading Estate

- 6.7.1. The site is entirely previously developed. It is designated as an Existing Business Area and a Simplified Planning Zone (SPZ). The wider estate is also subject to a Site Specific Allocation (SSA04).
- 6.7.2. The Estate is previously developed in full, and contains traditional I&L uses alongside existing DCs. Those portions of Estate that are being used as DCs ought not to be considered reasonable alternatives in the context of addressing need (as there would be little to no net gain in IT load capacity within the AZ).
- 6.7.3. If the proposal were to be provided on plots currently occupied by traditional I&L uses, all of the displaced occupiers of these units would require vacation and relocation.
- 6.7.4. At present, the Estate does not have any vacant/undeveloped sites, much of the site has been the subject of redevelopment and appears to be largely occupied. Whilst we understand that SEGRO, who manage the site, intend to redevelop older industrial units, a review of online sources (including CoStar, RightMove Commercial and SEGRO's own website) suggest that there are no land parcels of scale for redevelopment.
- 6.7.5. Core Policy 5 of the Core Strategy states that "there will be no loss of the defined Existing Business Areas to non-employment generating uses, especially where this would reduce the range of jobs available."
- 6.7.6. SSA04 allocates the site for mixed use development comprising:

#### **Alternative Sites Assessment**



Offices, Research and Development, Light Industrial, General Industrial, Storage and Distribution, Residential, Retail, Food and Drink, Hotels, Conference Facilities, Educational Facilities, Recreation and Leisure Uses.

6.7.7. With regard to the site's status as an SPZ, the Core Strategy states that this is:

A designated area in which planning permission is granted in advance for specific forms of development, provided the proposals comply with the conditions and the land use arrangements incorporated within the scheme.

- 6.7.8. As set out in the previous SPZ document for Slough Trading Estate 'an SPZ was originally designated at the Estate in 1995 and has been renewed every ten years since. The most recent SPZ was adopted on 12 November 2024, and will expire on 11 November 2034.
- 6.7.9. The adopted SPZ contains a number of constraints that serve to reduce the scope to deliver commercially viable cloud and hyperscale DCs. The SPZ lists a number of planning conditions that apply to the area, including:

**Condition 5**: Site coverage by buildings for a Colocation/Data Centre use to be erected, or built footprint (including any retained buildings, bridges/atriums between units or substation switchrooms but excluding any plant, plant gantry and deck parking facilities) shall not exceed 60% of the total site area of any individual development plot.

**Condition 8**: The maximum height of new development, including plant, equipment and machinery (including screening or enclosure but excluding stacks / flues which can be maximum of 3m higher than the maximum height specified for that zone) shall not exceed those set out in Table 1 Building Heights and shown on SPZ Plan 3.

6.7.10. With regard to building height, paragraph 1.37 of the adopted SPZ makes it clear that this restriction has been brought in specifically because of the height requirements of datacentres, and respond to constraints including proximity to residential receptors:

There is a shared aspiration between SEGRO and Slough Borough Council that some of the height parameters within specific zones can be increased to make the best use of land recognising that industrial buildings and Data Centres are now increasingly able to be taller thus a primary focus of the new SPZ is the development of taller industrial buildings in a planned and controlled manner. With no new development land available on the Slough Trading Estate the new SPZ will encourage a more efficient approach by intensifying the use of the existing land available.

- 6.7.11. The data centre component of the Development is 23m in height to parapet, with a maximum screen height of 30m. This rules out a significant proportion of the SPZ, with regard to the height limit plan on SPZ Plan 3.
- 6.7.12. There would also need to be consideration for the plot ratio requirements set out in Condition 5.

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- 6.7.13. If a type of development is proposed that does not fall within the SPZ permission and its conditions, planning permission would need to be applied for in the usual way. In these circumstances, such an application would be considered on its own merits, and therefore be determined outside the remit of the SPZ.
- 6.7.14. The site is therefore considered not to be available for development, and is not a suitable alternative site for the data centre element of the Appeal scheme.

#### 6.8. **Dromenagh Farm**

- 6.8.1. The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.
- 6.8.2. Planning permission was granted by Buckinghamshire Council under delegated powers on 12 June 2025 (ref. PL/24/2130/FA) for the redevelopment of the site to provide a new hyperscale DC. The Officer's Report stated that the site was considered by be grey belt, and that the development would therefore not be inappropriate. The level of need within the Slough AZ was also noted as a reason justifying approval.
- 6.8.3. Owing to the extant permission for the site's redevelopment, it is not available. Even with the delivery of the scheme there would still be overwhelming need for data centres in the Slough AZ.



Figure 8: Approved Ground Floor Plan at Dromenagh Farm (ref. PL/24/2130/FA)



Figure 9: Approved Roof Plan at Dromenagh Farm (ref. PL/24/2130/FA

#### **Alternative Sites Assessment**



### 6.9. Thorney Business Park

- 6.9.1. The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.
- 6.9.2. Outline permission was granted by Buckinghamshire Council on 29 May 2024 (ref. PL/22/1775/FA) for the demolition of existing buildings on part of the site, and the construction of DC development. Since then, another planning application (ref. PL/24/3532/OA) was validated 11 December 2024 for the demolition of further buildings, and additional datacentre development. The figure below shows both the approved data centres (shaded and to the left) and data centres subject to a pending application (unshaded and to the right).
- 6.9.3. The approved scheme comprises entirely previously developed land, the majority of the pending scheme is on undeveloped greenfield land.
- 6.9.4. Even with the delivery of the scheme (in part or, pending determination of the pending application) there would still be overwhelming need for data centres in the Slough AZ. The site is not available for the proposed scheme, nor is it capable of meeting the total need for data centre capacity in the Slough AZ.

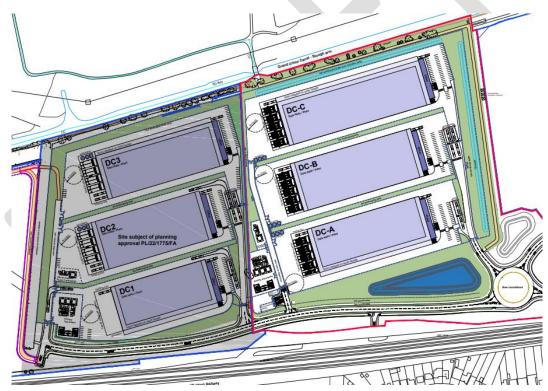


Figure 10: Proposed and approved development at Thorney Business Park, showing proposed data centres unshaded on the right (ref. PL/24/3532/O) and approved data centres shaded on the left (ref. PL/22/1775/FA)

#### **Alternative Sites Assessment**



#### 6.10. Western International Market

- 6.10.1. The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses including a Costco membership warehouse club. This portion of the site is under multiple ownerships (including Virtus, Costco, Glasgow City Council and the Mayor and Burgesses of the London Borough of Hounslow, and the BBC Pension Trust), and all of the occupiers of these units would require vacation and relocation. This portion of the site is not considered to be available for the data centre component of the Appeal scheme.
- 6.10.2. The southern half of the site is currently undeveloped, and is under the single ownership of the Mayor and Burgesses of the London Borough of Hounslow. However, there is a planning permission on this land for mineral extraction approved on 26 May 2023 (ref. P/2020/4001). As set out in the Committee Report for this application, mineral extraction will take place over seven years, with an additional seven years required to infill the site.
- 6.10.3. In light of the site's status as a mineral extraction site, it is therefore considered that the site will not be available for a period of at least 14 years (i.e. not until 2039).
- 6.10.4. As set out in the Need Assessment prepared by Savills Economics in support of this Appeal, there is an immediate need for additional DCs. Owing to the power agreement secured between Manor Farm Prop Co and the National Grid, a power connection to the Manor Farm site can be secured by 2027.
- 6.10.5. On the basis that Western International Market will be unavailable for at least 14 years, it is not considered to be a suitable alternative site for the data centre component of the Appeal scheme.

#### 6.11. Wexham Springs

- 6.11.1. The site is partially previously developed and within the Framewood Road Conservation Area, and contains a Grade II listed structure. The portion of the site constituting developed land is in use as offices, and remainder of the site comprises gardens, woodland, and wetland. There are also tennis courses and football pitches.
- 6.11.2. The Framewood Road Conservation Area Appraisal notes that:

Wexham Springs has been included in the conservation area principally for the special interest of its important planned landscape and the vestiges of the nationally significant CCA research station.

- 6.11.3. The site is subject to heavy tree cover, and many of these are subject to TPO (either individually or as part of a group), and there is a Grade II listed structure on site (the Corn King and Spring Queen Sculpture). These are both shown in the Conservation Area map included below.
- 6.11.4. An outline planning application for the redevelopment of the site to provide a data centre was validated on 27 July 2022 and withdrawn 10 November 2022 (ref. PL/22/2710/OA). No reason was given, and no subsequent application has been submitted at the time of writing.

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6.11.5. It would not be possible to deliver the data centre element of the Appeal scheme without requiring the loss of protected trees, and the delivery of a DC would have a significant impact on the character of the Conservation Area. It is not a suitable site, and not a viable alternative to the Appeal Site.

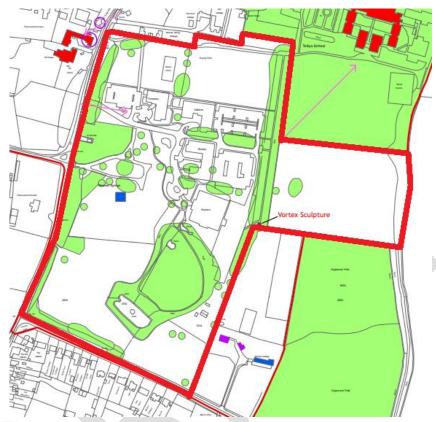


Figure 11: Extract of the Framewood Road Conservation Area Plan, showing (in green) all trees covered by a TPO at Wexham Springs. The blue square denotes the location of the Grade II listed structure.

#### 6.12. Former Colnbrook Landfill

- 6.12.1. The site is within the Green Belt, the Colne Valley Regional Park, and the Strategic Gap, as defined in the Slough Local Plan Proposals Map.
- 6.12.2. The site is a former clay quarry and was first granted consent for a landfill in January 1983 (ref. SDB916/81). Landfilling operations were granted 02 March 2000 (ref. P/10033/05). This was amended in order to extend the restoration date to 30 June 2012 (ref. P/10033/016, approved 15 November 2010). There are no more recent planning applications for the site at the time of writing.

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- 6.12.3. At present, there is only one point of access onto the site. A secondary access would be required for a DC use. This would need to be from the A4, and would need to be subject to a Highways assessment. A secondary access may be unfeasible.
- 6.12.4. Former Colnbrook Landfill is considered to a be a more strongly performing Green Belt, set against relevant Green Belt purposes, than the Appeal Site. For this reason, the site is not a preferable alternative to the Appeal Site, and is not a suitable alternative for the Development.

#### 6.13. Land South of Hollybush Lane

- 6.13.1. The site is within the Green Belt, and the Colne Valley Regional Park, as defined in the South Bucks Local Plan Proposals Map.
- 6.13.2. The site is also within the Denham Aerodrome Safeguarded Area.
- 6.13.3. The site was used for mineral extraction in the 1950s and 1960s, and later as a landfill site. An outline planning application was validated 11 October 2023 (ref. PL/23/3252) for:

Outline planning permission with all matters reserved (except for principal points of access) for the development of a film campus, comprising film production buildings (including sound stages, workshops, offices and backlot, ancillary retail and serviced accommodation), education floorspace, energy centre, and associated parking, servicing and green infrastructure

- 6.13.4. At the time of writing, this application is pending, and currently has an outstanding objection from Denham Aerodrome. The threshold height for safeguarding purposes is 10m, and the Aerodrome have stated in a consultation response that the maximum acceptable height is 12m. The height of the data centre component of the Appeal scheme is 23m to parapet, with a maximum screen height of 30m.
- 6.13.5. Beyond the pending application for an alternative use, and the fact that the site cannot potentially accommodate buildings in excess of 12m (preferably less than 10m), means that the site is not available for the data centre component of the Appeal scheme. It is not preferable to the Appeal Site, and not a suitable alternative.

#### 6.14. Phase 4, Stockley Park

- 6.14.1. The site is within the Green Belt, and an Air Quality Management Area, as defined on the Hillingdon Local Plan Proposals Map.
- 6.14.2. The site is owned by Prologis and located adjacent to the south of Prologis Park West London and identified for expansion for traditional Industrial & Logistics development. The site is not suitable or available for an alternative use.

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#### 6.15. **SIFE**

- 6.15.1. The site is within the Green Belt, the Strategic Gap, and the Colne Valley Regional Park as defined in the Slough Local Plan Proposals Map.
- 6.15.2. Planning permission was granted on 23 April 2024 (ref. CM/0030/23) for:

Creation of infill reception facility, formation of internal haul road and ancillary works, for the temporary period of infill and restoration operations

- 6.15.3. Condition 3 of the decision notice states that the works must be completed by 31 December 2029, though as at the Former Colnbrook Landfill and Land South of Hollybush Lane (both discussed above) there is the potential for this to be extended.
- 6.15.4. There is also a pending application (ref. CM/0049/21, validated 18 November 2021) on another portion of the site for:

Phased extraction of an allocated sand and gravel deposit, including for the construction and use of a new bell mouth access off North Park; Establishment and use of ancillary activities; and the importation of reclamation material with restoration to high quality agricultural land and nature conservation habitat.

- 6.15.5. At the Strategic Sites Committee on 08 June, the Council resolved to grant permission pending the completion of a s106. This is still pending.
- 6.15.6. The information submitted within the application states that the work is likely to take almost seven years, meaning that the site would not be available for an alternative use until 2032 at the earliest, even if the extraction works were to commence immediately.
- 6.15.7. On the basis that the site will be unavailable for at least seven years, it is not considered to be a suitable alternative site for the data centre component of the Appeal scheme.

#### 6.16. Woodlands Park

- 6.16.1. The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.
- 6.16.2. Outline planning permission was granted under a recovered and allowed appeal on 09 July 2025 (ref. PL/24/07754/OA) for:

Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (Use Class B8) of up to 72,000 sqm (GEA) delivered across 2 buildings to include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. Cycle and car parking, internal

#### **Alternative Sites Assessment**



circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, sustainable drainage systems, ancillary infrastructure and a substation.

6.16.3. This allowed appeal follows two refused applications for a DC scheme comprising three buildings across 163,000 sqm on the same site. Application ref. PL/21/4429/OA was dismissed at appeal on 02 September 2022; PL/22/3491/OA was refused by the Council on 18 May 2023.



Figure 12: Woodlands Park Site Development Strategy Plan (ref. PL/24/0754/OA)

6.16.4. Even with the delivery of the scheme (for either the approved 72,000sqm, or in the event of another 163,000sqm proposal) there would still be overwhelming need for data centres in the Slough AZ.

#### 6.17. Land South of Slough Road

- 6.17.1. The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.
- 6.17.2. An EIA Screening Request was validated 08 April 2025 (ref. PL/25/1155/EIASR) to establish whether the proposed development of a DC constituted on the site EIA development, the response provided on 28 May 2025 stated that an EIA was not warranted.

#### **Alternative Sites Assessment**



- 6.17.3. The site is bisected east-west by Colne Brook, which is in Flood Zone 3, there is a single point of access from Slough Road (A4007), and the second point of access would need to be taken via the Woodlands Park site to the south, raising the risk of ransom. The site is also constrained by overhead power lines from the liver Substation to the north.
- 6.17.4. Owing to these site constraints, the EIA screening request proposed a scheme that focussed development to the south of the site, and did not provide a secondary access point.



Figure 13: Indicative Layout for Land South of Slough Lane (ref. PL/25/1155/EIASR)

- 6.17.5. In the absence of a secondary access point, the site is not considered to be suitable for a DC occupier, and the site is therefore not an acceptable alternative for the data centre component of the Appeal scheme.
- 6.17.6. The site is not preferable to the Appeal site on these grounds, and is not a suitable alternative.
  - 6.18. Cemex Site, Iver
- 6.18.1. The site is in the Green Belt and the Colne Valley Regional Park as defined in the South Bucks Local Plan Proposals Map. It is an Allocated Minerals Site in the Buckinghamshire Minerals and Waste Local Plan.

#### **Alternative Sites Assessment**



6.18.2. Permission was granted on 03 November 2016 under reference CM/51/16 for:

Temporary closure of public footpath IVE/15/1, followed by the laying out of a site entrance, erection of new processing and concrete plants and related infrastructure, extraction of 2 million tonnes of sand and gravel, backfilling with inert waste and progressive restoration of the land to agriculture over a period of up to nine years.

- 6.18.3. Conditions 48 states that extraction of minerals shall cease by 31 December 2022, and that the restoration of the site shall be completed by 31 December 2026.
- 6.18.4. On 18 May 2022, under reference NMA/0007/22, the Council permitted a Non Material Amendment to the description of development to remove the phrase 'over a period of up to nine years.'
- 6.18.5. On 08 December 2023, under reference CM/0028/22, the Council approved a s73 application that, *inter alia*, revised the time limit condition from the original permission to read:

Extraction of minerals shall cease by 31 December 2025 and buildings, plant and machinery to which this permission relates shall be removed by and restoration shall be completed by 31 December 2029.

6.18.6. On this basis, the extraction of minerals on site has not yet completed, and the site is not expected to be completed within the next four years. It is not available for development, and is not a suitable alternative site.

#### 6.19. Land South of Hedgerley Lane

- 6.19.1. The site is in the Green Belt, the Colne Valley Regional Park, and a Biodiversity Opportunity Area as defined in the South Bucks Local Plan Proposals Map. It is an Allocated Minerals Site in the Buckinghamshire Minerals and Waste Local Plan. It also adjoins the Grade II listed structures of Hammer Cottage and Hart Cottage.
- 6.19.2. Permission was granted on 11 December 2018, under reference CM/57/15, for:

The extraction and processing of sand and gravel with restoration to agriculture using imported inert materials, the installation and use of mineral processing plant, a concrete batching plant and soil treatment plant, access onto Hedgerley Lane and ancillary buildings including a weighbridge, office, workshop and welfare facilities.

- 6.19.3. Condition 3 requires final restoration of the site to be completed either by 28 February 2031 or no later than 13 years after the date of commencement (whichever is the later).
- 6.19.4. Development on site has started, as established through both aerial photographs as well as a pending application (ref. CM/0025/23, validated 11 August 2023), which seeks to allow the:

#### **Alternative Sites Assessment**



Continuation of the development at Slade Farm Quarry at variance to conditions 6, (Phasing) and 7 (Phasing) attached to planning permission ref: CM/57/17 to allow for a variation of the approved phasing. Open for comment icon.

- 6.19.5. The application seeks to vary the phasing plan to allow extraction and restoration to take place over three phases rather than the previously prescribed eight.
- 6.19.6. The most recent planning application to discharge pre-commencement conditions was approved on 06 May 2021 (ref. AOC/0014/21). On this basis, and assuming that works could have commenced no earlier than 07 May 2021, the works must be completed, under Condition 3 of the original permission, no later than 07 May 2034.

On this basis, the site is not available for the data centre element of the Appeal scheme. The site is not a suitable alternative for the Development.

#### 6.20. Wapsey's Wood Landfill Site

- 6.20.1. The site is in the Green Belt, and contains Ancient Woodland along the northern border to the A40. There is a Scheduled Ancient Monument next to the site (Templars' Site at Moat Farm, Hedgerley). This is next to one of the two points of access.
- 6.20.2. The site is within two separate ownerships: Biffa and Veolia, and the arrangement of these ownerships present a problem from the perspective of access. Veolia's ownership, alongside the points of access, the Scheduled Ancient Monument, and the Ancient Woodland, is shown below. The unmarked area in the centre of the site, just south of the Oxford Road Access, is controlled by Biffa.



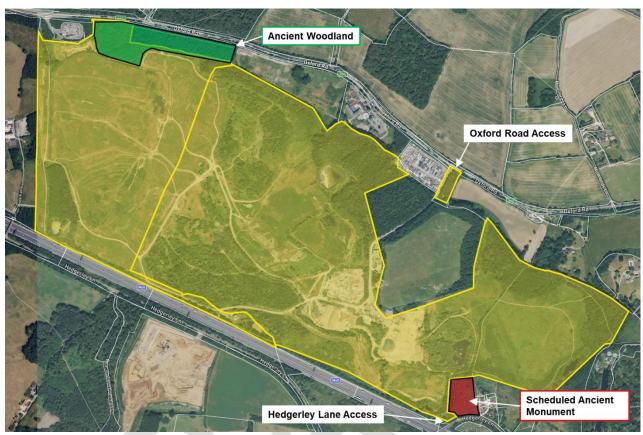


Figure 14: Wapsey's Wood Landfill, Veolia Ownership (source: Savills Maps)

6.20.3. A key constraint is the ownership at the Oxford Road Access, which is shown in more detail below. There are three ownerships: Veolia, Biffa, and a third party. Whilst there is a portion of the Veolia ownership that extends to the Oxford Road without crossing uncontrolled land, this portion of the Oxford Road borders Ancient Woodland, which cannot be considered suitable for removal.



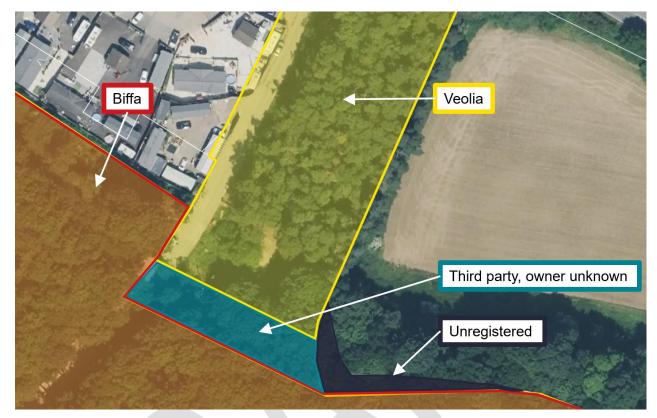


Figure 15: Wapsey's Wood Landfill, Oxford Road Access (source: Savills Maps)

- 6.20.4. Whilst there appears to be an existing access at Hedgerley Lane (close to the Scheduled Ancient Monument) it is not possible to secure a Secondary Access onto the site without going over third party land. The provision of a Secondary Access is a fundamental requirement for cloud and hyperscale DC occupiers, and without which a site cannot be considered suitable for the data centre element of the Appeal scheme.
- 6.20.5. It is not a suitable alternative.

#### 6.21. Land to the West of Pinewood Road

- 6.21.1. The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.
- 6.21.2. Permission was granted in 1994 SBD/0595/90/C for the following:

Extraction and processing of sand and gravel, with refilling with inert construction waste to restore the site to agriculture. Formation of new vehicular access.

6.21.3. The site benefits from two extant planning permissions for development relating to Pinewood Studios to the north, as well as a pending application for a DC. These are summarised below.

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Ref.	Description of Development	Decision	Date
PL/20/3280/OA	Outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sqm) comprising:  • A visitor attraction of 350,000 sq ft comprising a series of buildings  • 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot)  • Education and business hub (50,000 sq ft)  • Associated parking and servicing  • Green Infrastructure	Approved	11 April 2022
PL/22/2657/FA	<ul> <li>A hybrid application to comprise:</li> <li>Part A - A full application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve.</li> <li>Part B - Outline application - with all matters reserved (except for principal points of access) for land at Alderbourne Farm to comprise backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking;</li> <li>Part C - Outline application for 32.6 ha of land at Pinewood South with all matters reserved (except for three principal points of access) to comprise up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.</li> </ul>	Approved	28 July 2023
PL/23/2860/CONDA	Approval of condition 30 (Construction Environmental Management Plan (CEMP)) of planning permission PL/22/2657/FA	Approved	09 November 2023
PL/25/0311/CONDA	Details to partially discharge conditions 7, 12, 13 and 32 of PL/20/3280/OA	Approved	26 June 2025
PL/24/3701/DE	Approval of reserved matters (landscaping) comprising boundary landscaping adjacent to Pinewood Road submitted pursuant to condition 1 of planning permission PL/20/3280/OA. Details to partially discharge conditions 7, 12, 13 and 32 pursuant to the outline consent	Approved	26 June 2025

#### **Alternative Sites Assessment**



PL/25/2076/OA	Outline planning application with all matters reserved, except for the principal points of access from Pinewood Road and Uxbridge Road, to comprise data centre (Use Class B8) of up to 55,030 sq m (592,338 sq ft) GIA of building floorspace, power sub stations, associated plant, emergency back-up generators and associated fuel storage, vehicular and pedestrian access, car and cycle parking, landscaping, sustainable drainage system, other associated works, community garden (including growing space, orchard, informal recreation, learning space and multi-use site	Pending	Validated 03 July 2025

6.21.4. The image below shows both the redline of the DC application (ref. PL/25/2076/OA), with the areas covered by the other two applications (relating to film studio use) shown in yellow. Both of these applications have near identical red lines. Only Part C of planning application ref. PL/22/2657/FA covers this portion of the Pinewood site. Parts A and B are located further to the north, beyond the film studio itself.

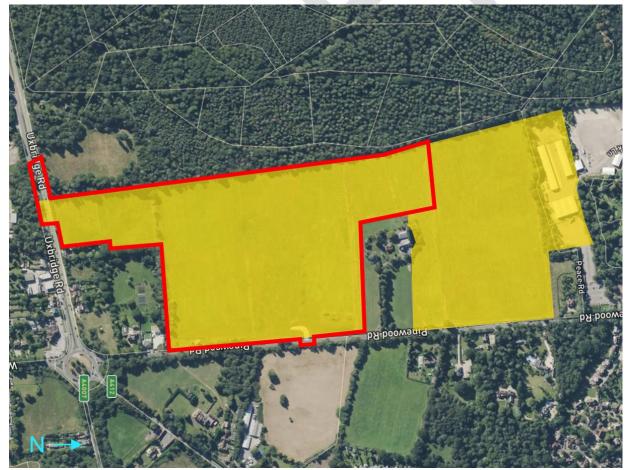


Figure 16: Land to the West of Pinewood Road. DC site (redline); area covered by other applications (yellow).

#### **Alternative Sites Assessment**



6.21.5. The Planning Statement submitted with the DC applications states that the two extant permissions 'provide a legal fallback which is a material consideration in the determination of the current appeal.' Both of the applications are assessed below, in turn.

#### PL/20/3280/OA

6.21.6. The application site comprises the area shaded in yellow only. Permission was granted on 11 April 2022. In the Committee Report for the application, which recommended approval, the Very Special Circumstances needed to justify development in the Green Belt were considered, and the following assessment provided:

The benefits centre on the national significance of what is proposed in terms of developing the strengths of Pinewood Studios in UK film production and delivering a complimentary nationally significant visitor attraction, both delivering a significant economic benefit. The proposals take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The expansion of studio space meeting demand will aid local, regional and national recovery. The visitor attraction will significantly boost tourism and aid the visitor economy in the county and region. The benefits are very significant and clearly align with local and national economic growth and recovery strategies. These are attributed very significant weight. The proposed Screen Hub UK is considered to be strongly related to the specific Pinewood site/location. This is attributed significant positive weight. The contribution to culture and the arts is attributed significant weight. Environmental benefits to BNG is afforded limited weight and community benefits are afforded very limited weight.

In considering the Green Belt balance and setting out all of the harms on one side and all of the benefits and other material considerations on the other side of the balance, officers have concluded that all of the harms are clearly outweighed by the benefits. 'Very Special Circumstances' do exist in this case

- 6.21.7. Many pre-commencement conditions were attached to the decision, not all of which appear to have been discharged.
- 6.21.8. Conditions 1 and 2 set out what reserved matters need approval, and the time conditions under which they must be made:

#### Condition 1

Approval of the details of the:

- layout;
- scale;
- appearance; and
- landscaping

relating to each element or part of the proposed development (the 'reserved matters') shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of that element or part of the development. The development shall be carried out in accordance with the approved details.

#### Condition 2

#### **Alternative Sites Assessment**



The first application for approval of reserved matters shall be made to the Local Planning Authority no later than 3 years from the date of this permission [i.e. no later than 11 April 2025]. The relevant elements of the development are:

- the Visitor Attraction:
- the film production buildings;
- the education hub; and
- the business growth hub.

The development shall be begun before the expiry of 2 years from the date of the first approval of reserved matters.

6.21.9. An application relating to reserved matters relating to the landscaping for one of the access points along Pinewood Road has been approved. This is shown in the image below:



Figure 17: Red Line (shown as dashed) for the first Reserved Matters application relating to PL/20/3280/OA

6.21.10. There are no records that any further applications for the approval of reserved matters have been submitted, or approved. In order to ensure that the permission does not lapse, development must begin on the site no later than 26 June 2027. This will require the discharge of all pre-commencement conditions. Of these, the most significant is Condition 10, which is a Grampian Condition involving highway improvements for either the Sevenhills Road scheme or the Five Points Roundabout scheme. There are various additional planning conditions that need to be discharged, and Section 106 Obligations to be fulfilled. Notwithstanding this, it would still be feasible for this development to be delivered.

#### PL/22/2657/FA

6.21.11. The application site comprises the area shaded in yellow, as well as land at Alderbourne Farm to the north beyond the film studio. Permission was granted on 28 July 2023. In the Committee Report for the application,

#### **Alternative Sites Assessment**



which recommended approval, the Very Special Circumstances needed to justify development in the Green Belt were considered, and the following assessment provided:

The proposed development is of national significance in terms of developing the strengths of Pinewood Studios in UK film production and delivering very significant economic benefit. The proposals take advantage of the global asset and anchor institution of Pinewood, realising significant benefits to the national, regional and local economy. The expansion of studio space meeting and stimulating demand would aid local, regional and national recovery. The education and business hub goes some way towards addressing the skill shortage in the sector. These benefits are very significant and clearly align with local and national economic growth and recovery strategies. These are attributed substantial weight. When attributing this weight community benefit, well-being and contribution to arts and culture is factored. The proposed development is considered to be strongly related to the specific Pinewood site/location. This is attributed significant positive weight. BNG is afforded significant weight and the nature reserve is attributed moderate weight.

- 6.21.12. Conditions time-limiting the outline aspects of the permission are the same as those for PL/20/3280/OA: the first reserved matters application to be submitted within three years, development to be started within two years of the first approval of reserved matters, and all reserved matters to be submitted within 10 years of the permission. This provides to following dates:
  - Submission of first reserved matters: no later than 28 July 2026;
  - Commencement of development: pending submission/determination of RMA;
  - Submission of final reserved matters: no later than 28 July 2033.
- 6.21.13. In planning terms, there is also sufficient time for this permission to be delivered. In light of the scale of need for film studio development mentioned in the information submitted with the planning application, it appears likely the proposal could come forward, making the site unavailable for a data centre development. The site's importance to Pinewood is set out in Chapter 8 of the Planning Statement:

The opportunity to deliver a growth hub only exists at Pinewood.

The presence of the existing studio, together with its unique and worldwide reputation creates an opportunity that cannot be replicated in any other geography.

The existing studio provides a legacy that includes some of the most celebrated and successful movies, together with cutting edge innovation in the way in which movies and television are filmed and produced. This relationship creates a link not only to the past and present of film making, but also to its future, with Pinewood being current home to Disney and other word renowned film companies who will continue to use the site for the production of blockbuster movies.

Further film production space would respond to the substantial demand that exists in both the West London Cluster and at Pinewood itself. The scale of the additional floorspace is such that it is capable of accommodating the production of large 'blockbuster' scale movies.

#### **Alternative Sites Assessment**



The existing studio is set within the Green Belt and given the locational imperative defined above there is no alternative but to utilise Green Belt land in order to accommodate the development proposal.

6.21.14. A key difference between the Outline permission of 2022 and the Full permission of 2023 is the significant increase of floorspace devoted to film production: from 350,000 sqft to 1,365,000 sqft. As set out in Chapter 5 of the Planning Statement for the Full application, this is owing to a significant level of unmet need:

The British Film Institute/British Film Commission has identified the shortage of studio space to meet the demand arising from inward investment to the UK and home production. This has been the case for the last ten years or so and has been part of the rationale for the expansion of Pinewood and Shepperton studios (amongst others) supported by industrial bodies, customers and Government.

The British Film Institute's assessment is that there remains significant demand for sound stages and film production space. Creative UK note that the UK's film making facilities need to keep up with that demand as there will always be attractive offers elsewhere.

- 6.21.15. The information submitted with the application makes clear that there is clear need for the film studio scheme, that it cannot be delivered anywhere else, and that there are significant social and economic benefits and incentives for to delivering it. Without clarity on whether or not the film studio scheme comes forward, the site may not be considered reasonably available for a DC scheme.
- 6.21.16. On this basis, the site is not considered to be available, and is therefore not a reasonable alternative for the data centre element of the Appeal scheme.
- 6.21.17. This point notwithstanding, even if the pending Pinewood application (ref. PL/25/2076/OA) is approved and the development delivered, it is not capable of meeting the identified level of need within the Slough AZ. Even with the delivery of the scheme there would still be overwhelming need for data.

### 6.22. Concluding Comments on Sites

- 6.22.1. As these assessments demonstrate, there are no suitable and available sites within the Area of Search capable of meeting the level of identified need (alone or in combination) in the timescale necessary for the Development. Even with the delivery of approved and pending schemes, the need in the Slough AZ would still be overwhelming.
- 6.22.2. Concluding comments for each site other than Manor Farm (the Appeal Site) are summarised below.

Site	Comment
188-216 Bath Road	Site has pending permission for DC, and is not considered to be available.
Axis, Langley (South of Langley Train Station)	Site has permission for DC, and is not considered to be available.

### **Alternative Sites Assessment**



Former Akzo Nobel Site,	Site has permission for DC, and is not considered to be available.
Slough	
Heathrow Distribution Centre	To facilitate redevelopment, vacant possession of the site and relocation of existing occupiers is required. This includes Royal Mail who occupy a largescale distribution centre.
Slough Trading Estate	There are no undeveloped sites, and much of the Estate has been the subject of redevelopment and appears to be largely occupied. We understand that there are no land parcels of sufficient scale available for redevelopment.
Dromenagh Farm	Site has permission for DC, and is not considered to be available.
Thorney Business Park	Site has permission for DC, and a pending application for additional DC development. It is not considered to be available.
Western International Market	Site unavailable until at least 2034 owing to use for minerals extraction.
Wexham Springs	Site is heavily constrained by protected trees, and it would not be possible to deliver the data centre element of the Appeal scheme without requiring significant loss. Site is also in a Conservation Area, and the delivery of a DC is considered to have a significant impact on the character of the Conservation Area.
Former Colnbrook Landfill	The Site is considered to perform more strongly on Green Belt terms, and is not sequentially preferable to the Appeal site.
Land South of Hollybush Lane	Proximity to Denham Aerodrome means a threshold height for safeguarding purposes of 10m. The Aerodrome has stated that the maximum acceptable height is 12m. Site is therefore not suitable on grounds of building height.
Phase 4, Stockley Park	Site is part of Prologis' expansion plans for Stockley Park, and is coming forward for traditional I&L development. It is not considered to be available.
SIFE	Site unavailable until at least 2032 owing to use for minerals extraction.
Woodlands Park	Site has permission for DC, and is not considered to be available.
Land South of Slough Road	Site is unable to secure two points of access. Site is undeveloped Green Belt site.
Cemex Site, Iver	Site unavailable until at least 2029 owing to use for minerals extraction.
Land South of Hedgerley Lane	Site unavailable until at least 2034 owing to use for minerals extraction.
Wapsey's Wood Landfill Site	Site is unable to secure two points of access owing to ownership constraints.
Land to the West of Pinewood Road	The site has a planning permission for development relating to film-

#### **Alternative Sites Assessment**



# 7. Conclusion

- 7.1. This ASA has been prepared by Savills on behalf of the Appellant, Manor Farm Propco Ltd, to support a planning appeal for a DC and BESS for at Manor Farm, Poyle.
- 7.2. Following a robust methodology, the ASA has identified an Area of Search, the minimum site requirements necessary to accommodate the DC aspect of Appeal scheme, alongside appropriate site suitability criteria when considering the specific locational and physical requirements of cloud or hyperscale DC use.
- 7.3. The ASA exercise applied a series of staged assessments to establish whether any suitable alternative sites exist within the Area of Search. It has been demonstrated that the alternative sites identified are either unsuitable and/or unavailable for the development of the data centre component of the Appeal scheme. In addition, none of the identified sites would be capable of meeting the established level of need for data centres in the Slough AZ if they were to be delivered as cloud or hyperscale data centres. In addition, it is essential that cloud and hyperscale DCs are in locations such as this (i.e. ones with access to power, fibre, and in proximity of other DCs for resilience).
- 7.4. Stage 1 of the ASA exercise identified a total of 36 sites (including the Appeal site). These were considered in Stage 2 on grounds of size and shape.
  - 33 sites progressed to Stage 3 as being acceptable in shape and size;
  - 20 sites progressed to Stage 4 as being potentially suitable; and
  - None save the Appeal site were identified as a suitable alternative for the data centre component of the Development.
- 7.5. It is worth emphasising that the Development has been advanced, in part, on a 'power-led' approach that (with the addition of the BESS) ensures a connection to the grid by 2027, and without the need to await grid improvements. This means that the Development is able to contribute towards meeting both the level of need and its urgency, unlike the sites identified in this ASA.
- 7.5.1. The ultimate conclusion is that the Appeal Site is that no alternative sites are available and that the most sequentially preferable for the data centre element of the Development.

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