

Land at Manor Farm, Poyle

Proof of Evidence of Mr Alex Cole BSc Hons, MSc, MRTPI
Alternative Sites

Appeal Reference APP/J0350/W/25/3366043

Prepared for Manor Farm Propco Limited (the Appellant)

September 2025

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1 Executive Summary

- 1.1.1 An Alternative Sites Assessment prepared by Savills has been submitted with the Appeal and addresses the concerns raised by SBC in its Statement of Case in relation to the Colliers ASA. The assessment nevertheless reaches the same conclusion that there are no alternative sites available for the data centre component of the Development.
- 1.1.2 This was the conclusion that was reached recently by the Secretary of State in the Woodlands Park Landfill Site based on a similar geography. In my view it is reasonable to take the same view on this Appeal.
- 1.1.3 The Appeal site presents the opportunity to make a meaningful contribution towards meeting the overwhelming need for additional data centre capacity within the study area calculated to be 2,970 MW to 2030. Such is the scale of the need that despite there being multiple sites with consents for data centres and there is potential for the Slough Trading Estate to deliver additional data centre capacity, the overwhelming level of need requires multiple data centre sites to come forward quickly. Given the urgency of the need established the site presents an opportunity to rapidly make a meaningful contribution to addressing the shortfall.
- 1.1.4 The ASA undertaken robustly considers sites within the study area that could come forward, however reaches a judgment that there are no alternative sites. I respectfully request the Inspector recognises this position as an important factor for the Appeal.

2 Personal Background

2.1 Report Author

- 2.1.1 My name is Alex Cole, and I hold a Bachelor of Science Degree in Geography (BSc Hons), a Master of Science degree in Town Planning (MSc) and am a qualified Member of the Royal Town Planning Institute (MRTPI).
- 2.1.2 I am a Director within the Planning division at Savills which is the largest planning consultancy business in the United Kingdom. I am based in Savills Margaret Street, London office and joint-manage a team of over 40 planners forming part of an overall office team that exceeds 100 people. I, and the Planning team, undertake our work in accordance with the Royal Town Planning Institute's Code of Conduct for planning professionals.
- 2.1.3 I have practiced as a Town Planner for over 12 years, during which time I have been personally involved in large-scale development projects for industrial and logistics and data centre developments in London, the South East and further afield in England.
- 2.1.4 I have been involved with the redevelopment of the Appeal Site since March 2025 which is after the original planning application was submitted. I visited the site on 7th July 2025.
- 2.1.5 My role has been limited to the Appeal stage only. I was not involved in the project at the time an Alternative Sites Assessment prepared by Colliers was submitted with the original planning application. There are matters that I disagree with within that specific report, and the Alternative Sites Assessment prepared by Savills [and enclosed with this proof of evidence] as part of the Appeal is intended to replace that report.
- 2.1.6 This Proof of Evidence [and Alternative Site Assessment] is provided for this appeal reference APP/J0350/W/25/3366043 and is based on my own professional judgment. It is presented and given in accordance with the guidance of my professional institution and is true to the best of my knowledge and belief and is my professional opinion.

3 Introduction

3.1 Report Purpose and Structure

3.1.1 My Proof of Evidence (“POE”) has been prepared on behalf of Manor Farm Propco Limited (hereafter referred to as “the Appellant”).

3.1.2 This planning appeal APP/J0350/W/25/3366043 is made under Section 78(2) of the Town and Country Planning Act 1990 (“Appeal”) against the non-determination by Slough Borough Council (“SBC”) of full planning application Ref No: P/10076/013 (“the Application”) in respect of land known as Manor Farm, Poyle Road, Slough (“the Appeal Site”).

3.1.3 The Application was submitted to SBC on 13th December 2024 seeking planning permission for:

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

3.1.4 My POE deals with the matter of potential alternative sites for the Development, and I reserve the right to add to or amend my evidence on receipt of evidence submitted by SBC and any other interested parties.

3.1.5 My evidence should be read alongside the other Proofs of Evidence that have been prepared on behalf of the Appellant, namely:

- Mr Philip Murphy – Planning and Overall Planning Balance
- Mr Mark Powney – Need
- Mr Tim O'Reilly - Power

3.1.6 My POE addresses the ‘Availability of Alternative Sites’, a main consideration for the Appeal identified at the Case Management Conference (“CMC”) on 22nd July 2025. The other aspect of this main consideration is ‘Need’ which will be covered separately by Mr Mark Powney. Where relevant I rely on his evidence in so far as it relates to the consideration of alternative sites.

3.1.7 My evidence should be read in conjunction with the Planning Statement of Common Ground [Core Document CD 8.7] covering matters including the Appeal Site, Planning History and the Appeal Proposals.

4 Alternative Site Assessment Overview

4.1 Introduction

4.1.1 SBC contends that there are a large number of alternative sites available which are capable of contributing to the need for data centres in the Slough Availability Zone, the majority of which are much better located than the Appeal Site or on brownfield sites (SBC SC para 6.57).

4.1.2 My POE sets out the locational requirements of the data centre component of the Development and demonstrates there is a lack of alternative sites for it in the Slough Availability Zone. This lack of alternative sites is either because sites are under the control of other developers and benefit from planning permission for data centre or other uses and are therefore not available; or because they are burdened by constraints that make them unsuitable for the data centre component of the Development. In any event, it is the Appellant's view overall (when this POE is read alongside the Appellant's other evidence on Need, Power and Planning) that the identified need for data centres in the Slough Availability Zone is overwhelming and cannot be met over the short and medium term even if all of the sites capable of accommodating data centres were delivered.

4.1.3 My POE is supported by the enclosed free-standing Alternative Sites Assessment (ASA) by Savills (at Appendix 1) that supersedes the ASA by Colliers that accompanied the planning application for the Development. The Savills ASA addresses the concerns raised by SBC in its Statement of Case in relation to the Colliers ASA but nevertheless reaches the same conclusion that there are no alternative sites available for the data centre component of the Development. This was the same conclusion that was reached recently by the Secretary of State in the Woodlands Park Landfill Site appeal that related to broadly the same geographical area, albeit the Local Planning Authority for that proposal was Buckinghamshire Council. It would be reasonable for the same conclusion to be reached in this Appeal given how recently the Woodlands Park proposals were determined and the similar broad area of search employed and sites assessed.

4.1.4 I would add there is no evidence to suggest there is scope to meet the identified need for data centres within the Slough Availability Zone including at the Slough Trading Estate. SBC's Statement of Case refers to STE being able to accommodate 4.3m sqft of data centre floorspace. I do not see any evidence that this is possible, however even if this land was brought forward it still would not meet the forecasted needs within the study area and hence development will be needed elsewhere including on Green Belt land. This is considered in Mr Powney's Proof of Evidence.

4.2 Locational Requirements for Data Centres

4.2.1 As the evidence of Mr Powney explains, hyperscale data centres have very specific locational requirements. These include:

- Being within close proximity to other data centres forming an "Availability Zone" for resilience purposes;

- A reliable source of power supply (typically at 132kv);
- High quality diverse fibre connectivity;
- A site that is physically large enough and able to offer two diverse points of access to a site; and
- Low risk locations not restricted by constraints including flood plains, complicated land ownership and proximity to sensitive receptors among other factors, where one or a combination of several factors make specific sites unacceptable for hyperscale data centre development.

4.2.2 The Appeal Site is located within the Slough Availability Zone within proximity of other data centres. Such proximity ensures resilience and ‘uptime’. Importantly, the Appeal Site is located within 10km of the Slough Trading Estate (STE) that is subject of the Simplified Planning Zone. The Appeal Site meets all the criteria above, including in relation to power and fibre availability.

4.2.3 Mr Powney explains in his evidence the importance and relevance of an Availability Zone (“AZ”), ‘uptime’ and resilience, latency speeds and limitations to the maximum distance between the different data centre sites. These maximum distances are a critical consideration for the purpose of an Alternative Sites Assessment.

4.3 Availability Zone

4.3.1 Hyperscale public cloud data centres need to be located in clusters, known as AZs. It is common ground that there is an established AZ at Slough known as the Slough Availability Zone (“SAZ”) which is an internationally recognised location for data centres, and that the Appeal site is located within the SAZ [SoCG 7.12].

4.3.2 It has also been agreed the Slough Trading Estate Simplified Planning Zone (“SPZ”) is within the SAZ [SoCG 7.13]. It has been established that each AZ is self-reliant where the identified need within a given AZ can only be met within that AZ. This has been set out, as a point of principle, most recently in the Appeal Decision at Woodlands Park¹, paragraph 5.80, which states “the need within the globally significant SAZ can only be met within the SAZ and at no other location.” It is not relevant to consider whether there are other sites in other AZs outside of the SAZ when considering how to meet the need identified within the SAZ. This is one of several factors for preparing an area of search for an Alternative Sites Assessment exercise.

4.4 Background for Alternative Sites Assessments

4.4.1 There is no established methodology for carrying out an Alternative Sites Assessment as there are currently no national or local policies making this a formal planning test. However, the lack of alternative sites can be an important aspect of a planning case and has been a factor within several recent hyperscale data centre applications and appeals within the Green Belt².

¹ Appeal reference APP/N0410/W/24/3347353

² Woodlands Park Landfill (APP/N0410/W/24/3347353), Abbots Langley (APP/P1940/W/24/3346061), South Mimms (approved at Hertsmere Committee)

4.4.2 In the case of this Appeal, it is important to establish that if potential alternative sites do not address the identified need, then they do not represent an alternative. This approach was followed in the Judgment of the Court of Appeal in the case of *Secretary of State for Communities and Local Government and Knight Developments Ltd v Wealden District Council* [2017] EWCA Civ 39. [CD 7.12]

4.4.3 Lord Justice Lindblom made the following observations about how the Inspector had (correctly) approached the issue:-

"66.... He was not satisfied that such other sites as were available for housing development in the district would be sufficient to meet the need, or that the shortfall would be made up by development elsewhere. This was a matter of planning judgment for him. He also found that those other sites would "collectively still fall short of the full [objectively assessed need]", so they "[did] not amount to an alternative". This too was a matter of planning judgment." (my emphasis).

4.4.4 He went on to state that:-

"68.... I do not think the policy in paragraph 116 of the NPPF obliged the Inspector to deal in his decision letter with every potential site for housing in the district, one by one.... The decisive consideration was, clearly, the remaining need for market and affordable housing both in Crowborough and in the district as a whole".

4.4.5 This approach was followed in the recent appeal for the Woodlands Park landfill site. In the case of the Appeal, it is necessary to have regard to the total identified need within the SAZ established within Mr Powney's evidence which would require multiple data centre sites to come forward. This is instead of determining whether there is a single alternative site on which the appeal scheme could be located even if this site, or sites, have planning permission.

4.4.6 It is relevant to note that this approach was established between the Appellant and Buckinghamshire Council within a Statement of Common Ground submitted as part of the Woodlands Park Landfill Site, Iver during an appeal against the refusal of planning permission for a data centre development of up to 72,000 sqm of floorspace³. This appeal was recovered by the Secretary of State and allowed on 9th July 2025. The Woodlands Park site is recognised as being located within the SAZ and the Alternative Sites Assessment carried out for that site considered potential alternatives and the lack of alternative sites was recognised by Buckinghamshire Council, and alternative sites was not a factor contested within that appeal.

4.5 Matters within Slough Borough Council's Statement of Case

4.5.1 Savills have reviewed the Statement of Case ("SoC") prepared by SBC which includes criticism of the Colliers ASA submitted with the planning application. The pertinent matters are set out within Sections 6.17 – 6.59, 6.147, 6.228, 6.232, 6.246, and 6.249 of the SoC.

³ Appeal reference APP/N0410/W/24/3347353

4.5.2 Enclosed to this Proof of Evidence is a table that quotes each of these matters and how this feedback has been addressed in the Savills Alternative Sites Assessment.

4.5.3 SBC's key observations are that:

- Appropriate flexibility is required to consider whether there are alternative sites that could accommodate the type of development (i.e. incorporating flexibility and looking for sites that are smaller than the Appeal Site) and no ASA has been carried out for the battery storage facility;
- The original ASA looked for sites that could only be supplied by both the Iver and Laleham substations and could be delivered by 2027;
- The area of search excluded the STE and other sites with recent consents for hyperscale data centres in the SAZ;
- The STE has the 'ability' to deliver over 4.3m sq. ft of additional data centre accommodation over the next 7 years to meet the need for data centres in the SAZ.

4.6 The Appellant's Alternative Sites Assessment ("ASA")

4.6.1 The Appellant conducted an ASA, submitted as part of the Appeal (see Appendix 1), to replace the original ASA prepared by Colliers for the application. The Savills ASA also responds to the feedback provided within SBC's SoC to the original ASA.

4.6.2 The geographical scope of the ASA based on Availability Zone proximity and access to power follows the approach taken within the proposals at Woodlands Park, Abbots Langley and South Mimms. I note that a factor within the recent ASA for the Woodlands Park site included the Heathrow flight path as a risk and factor for assessment, but the issue has been considered by KL Grant Consulting Ltd in their note at Appendix 3 and for that reason I have not discounted sites within the flight path within the ASA.

4.6.3 The robust methodology is covered in detail within Section the Savills ASA. However, in summary the Savills ASA adopts a multi-stage process to consider whether there are alternative sites that meet the requirements for the Development. In the interest of robustness and in response to SBC's SoC, the ASA methodology includes:

- Making an allowance for flexibility by looking for sites capable of being large enough to deliver the data centre aspect only without the battery storage proposals, and looking for sites that are 10% smaller than the data centre only site area;
- Considering sites within the SAZ that are close enough to either the Iver or Laleham substations instead of both (to increase the area of search); and
- Carrying out a rounded assessment that does not front load the consideration of delivery by 2027, thereby avoiding this criterion influencing the selection of sites at the start of the process. Instead, deliverability is only considered as a relevant factor later in the assessment, with the relevance of timescales being linked to wider power supply.

4.6.4 It has been established by the Appellant that there is sufficient fibre connectivity across the SAZ such that this is not a relevant consideration for discounting potential sites.

4.6.5 As set out within SBC's SoC [Core Document CD 10] at Sections 6.17-6.59 and 6.147 there are several sites within the SAZ that have consents for hyperscale data centres, in addition to others that are subject to ongoing planning applications. The SoC also identifies the STE, and its SPZ as a location recognised as being appropriate for additional data centres. Each of these sites is acknowledged to be relevant and is captured within the area of search within the Savills ASA; however, none of these sites is considered to be available.

4.6.6 However, the scale of need established within Mr Powney's evidence is such that the scale of consented Data Centres within the SAZ does not meet evidenced needs, nor indeed do the other sites act as a legitimate reason to come to a view that there are suitable alternatives sites to the Appeal Site capable either of delivering the data centre component of the Development, or of meeting the identified need for data with the SAZ. In this context it is important to recognise it is essential the site comes forward to meet the urgency of the need identified within Mr Powney's evidence.

4.6.7 For the avoidance of doubt, the Battery Energy Storage System is not included within the Alternative Sites Assessment as this would only be a hypothetical exercise. For his scheme, the BESS is an essential component. There is little evidence to dispute that and arguably the Appellant could have run the ASA using a larger site size. However, a smaller site size excluding the BESS was used to be as robust as possible because a BESS may not be required if a Data Centre was located somewhere else with different grid connection agreements. This is considered to be a strength of the ASA exercise in demonstrating flexibility. For further analysis on why the BESS is required please refer to Mr O'Reilly's Proof of Evidence.

4.7 Assessment of SBC's SoC

4.7.1 There are two matters within SBC's SoC that I wish to draw attention to.

Potential for Additional Data Centre Supply on STE

4.7.2 The first of these is the suggested ability for over 4.3m sq.ft of Data Centre capacity to be delivered on the Slough Trading Estate referenced within Section 6.47 of SBC's SoC, particularly within the timescales associated with the delivery of the Appeal scheme.

4.7.3 This does not appear to be the case because:

- Having reviewed Segro's website (the owner and manager of the STE) there is no evidence to suggest there are sufficient sites available to deliver the 4.3m sq.ft of development suggested. Given the high levels of occupancy on the STE by a range of industrial occupiers, it does not appear likely there would be opportunities in the short term to assemble sites of scale within the STE
- There is limited evidence of Prior Approval applications or planning applications for Data Centre developments within the STE (the ongoing application on Bath Road is covered in the Savills ASA); and

- As per Mr O'Reilly's evidence [Section 6.3] the capacity of existing provision at STE has already been exceeded and requires network reinforcement to increase supply.

Potential for Additional Data Centre Supply to West

4.7.4 The second matter to which I wish to draw the Inspector's attention is SBC's perception [SBC SoC 6.50] that there is scope for the provision of more data centres within the western part of the SAZ that have not been considered.

4.7.5 Defining an acceptable area of search includes identifying land that is within reasonable proximity to sufficient power. For the SAZ this is land within 10km of either the Iver or Laleham substations.

4.7.6 The limiting factor for land that is to the west of the STE and theoretically within the SAZ is that it is located further than 10km from Iver or Laleham substations. I understand there are no substations capable of serving a Data Centre to the west of the STE. For further evidence on the availability of future connections to the transmission system in West London, please refer to the evidence of Mr O'Reilly on this matter.

4.7.7 SBC ought to be in broad support of the adoption of the site search area factor in the ASA, which is land located within 10km of the centre point of the STE within the SAZ. This is relevant because it acknowledges the STE as the centre point of the SAZ. Sites located within 10km of it, including the Appeal Site, can connect to other Data Centres in the STE for resiliency purposes. The Appeal therefore supports the function and attractiveness of the STE.

5 Summary and Conclusions

- 5.1.1 My evidence concentrates on the issue of alternative sites raised in the CMC and indeed within Sections 6.17 – 6.59, 6.147, 6.228, 6.232, 6.246, and 6.249 of the SBC SoC. For further detail on my responses to these sections of the SoC please refer to the enclosed table that signposts how the Savills ASA and Appeal documents address this feedback. This is a matter that has been covered recently within planning appeals for Data Centres including within the SAZ.
- 5.1.2 An ASA prepared by Savills has been submitted as part of the Appeal establishing a robust area of search and methodology to consider whether there are any reasonable alternatives sites for the Development when compared to the Appeal Site. The ASA clearly establishes that within the area of search there are various criteria that eliminate sites from being potentially appropriate or available for the data centre component of the Development even accounting for reasonable flexibility.
- 5.1.3 It is recognised there are various sites within the SAZ that have recent consents for hyperscale data centre developments, and sites subject of ongoing planning applications. I acknowledge the claim made by SBC within its SoC that there is the potential for additional data centre development within the STE, however based on my assessment there are no alternative sites based on the judgments reached in the ASA.
- 5.1.4 Notwithstanding this, it is established within Mr Powney's evidence that the need figure within the study area is 2,970 MW to 2030, with an identified supply of 1,152 MW. This is a figure that exceeds the 2,486 MW need figure (covering the period 2024 to 2029) established within the Woodlands Park Landfill appeal (recovered and allowed by the Secretary of State)⁴. Based on Mr Powney's evidence there is a need shortfall of circa 1,820 MW by 2030 even if all of the supply recently consented or subject of planning applications is delivered.
- 5.1.5 In the case of the Appeal it is necessary to have regard to the total identified need within the SAZ established within Mr Powney's evidence which would require multiple data centre sites to come forward. This is instead of determining whether there is a single alternative site on which the appeal scheme could be located even if this site, or sites, have planning permission. The Appeal documentation establishes that power is severely constrained, which is a fact that is well recognised. Given the urgency of the need established the site presents an opportunity to rapidly make a meaningful contribution to addressing the shortfall given the site has access to power capable of being delivered in 2027.
- 5.1.6 In light of preceding analysis about the robust ASA submitted with the Appeal, and the findings of that ASA itself, I respectfully request the Inspector recognises there are no alternative sites within the study area in the context of the overwhelming, urgent and established need for additional data centre sites to come forward as an important factor for the Appeal.

⁴ Appeal reference APP/N0410/W/24/3347353, para. 16

5.1.7 As per the Secretary of State's Assessment in the Woodlands Park Appeal,⁵ the fact there were no alternative sites ought to carry 'significant weight' in favour of the Appeal.

⁵ Appeal reference APP/N0410/W/24/3347353, para.19