

Appendix 1: Savills Alternative Sites Assessment

Manor Farm, Poyle

Alternative Sites Assessment





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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.

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 2017¹, 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.

¹ *Goodman Logistics Developments (UK) Limited v SSCLG & Slough Borough Council [2017] EWHC 947 (Admin)* at §55

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.

- 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.

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 preferable when all material considerations are taken into account.

- 2.9. Further detail regarding the methodology for each stage of assessment is set out below.

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

- 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 of the Development , a site must be at least 5.2 ha.	Site is 5.8 ha or more	Green
		Site is between 5.2 and 5.8 ha	Yellow
		Site is below 5.2 ha	Red

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

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 separation from sensitive uses such as residential, care homes, schools and colleges, and 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 not close to incompatible land uses.	Green
		Site is close to sensitive uses, but can be suitably mitigated.	Yellow
		Site is close to sensitive uses and cannot be suitably mitigated.	Red
Visual Impact	Depending on the site specifics, whether the data centre development would lead to an unacceptable impact on visual amenity.	Site is unconstrained and not subject to visual sensitivities	Green
		Site is constrained, but visual impact can be reasonably mitigated	Yellow
		Site is constrained, and visual impact cannot be reasonably mitigated	Red

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

- 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.

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 preferable 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.

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	✓ 10km	✓ 10km
Abbots Langley	✗	✓ 8km	✗
South Mimms	✓ 10km	✓ 20km	✗
Manor Farm (Appeal Site, this ASA)	✓ 10km	✓ 10km	✗

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 State².

² 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.

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 Estate³, 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.

³ 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

- 3.13. In the appeal decision at Abbots Langley⁴, 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.

⁴ 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

- 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 application⁶ 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.

⁵ Why is this town Europe's largest data centre hub? (BBC News, 21 May 2024, <https://www.bbc.co.uk/news/articles/cyrl7nlnkipo>)

⁶ 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

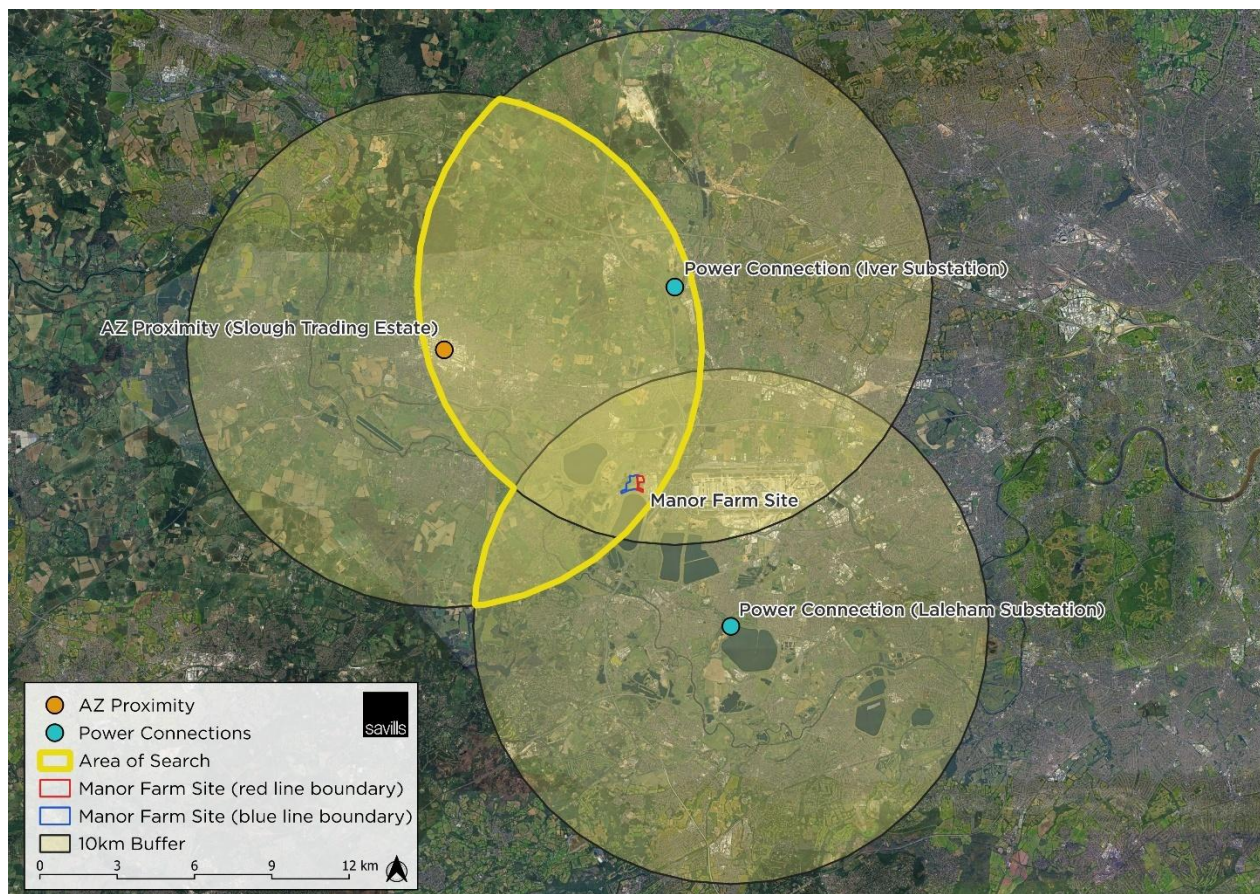


Figure 1: Area of Search, calibrated with 10km radii for nearby AZ core and GSPs

- 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:

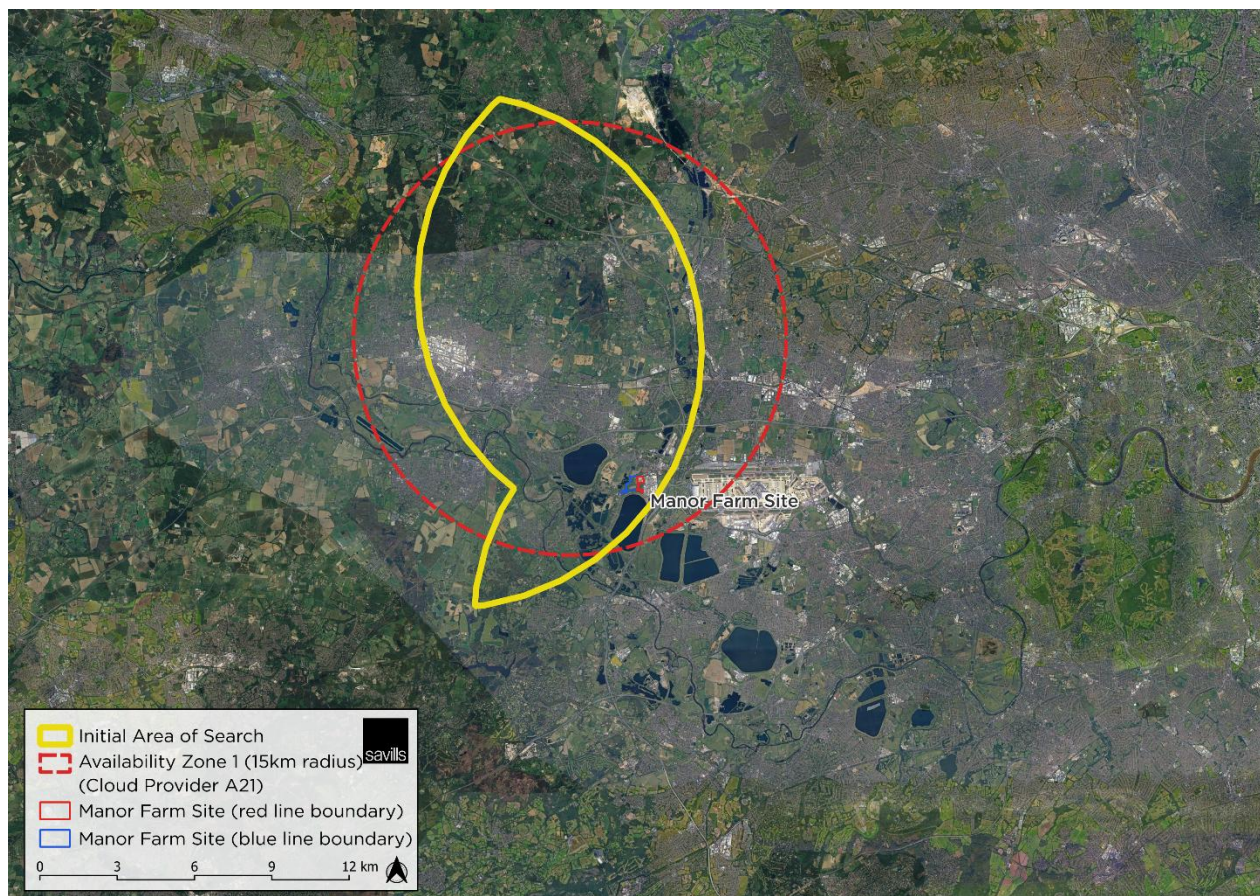


Figure 2: Savills Area of Search (yellow) with Woodlands Park's ASA for Slough AZ (red)

- 3.25. For robustness, we propose to incorporate most of the Woodlands Park Area of Search (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 Search has been discounted. The final Area of Search is shown in Fig. 3 below.

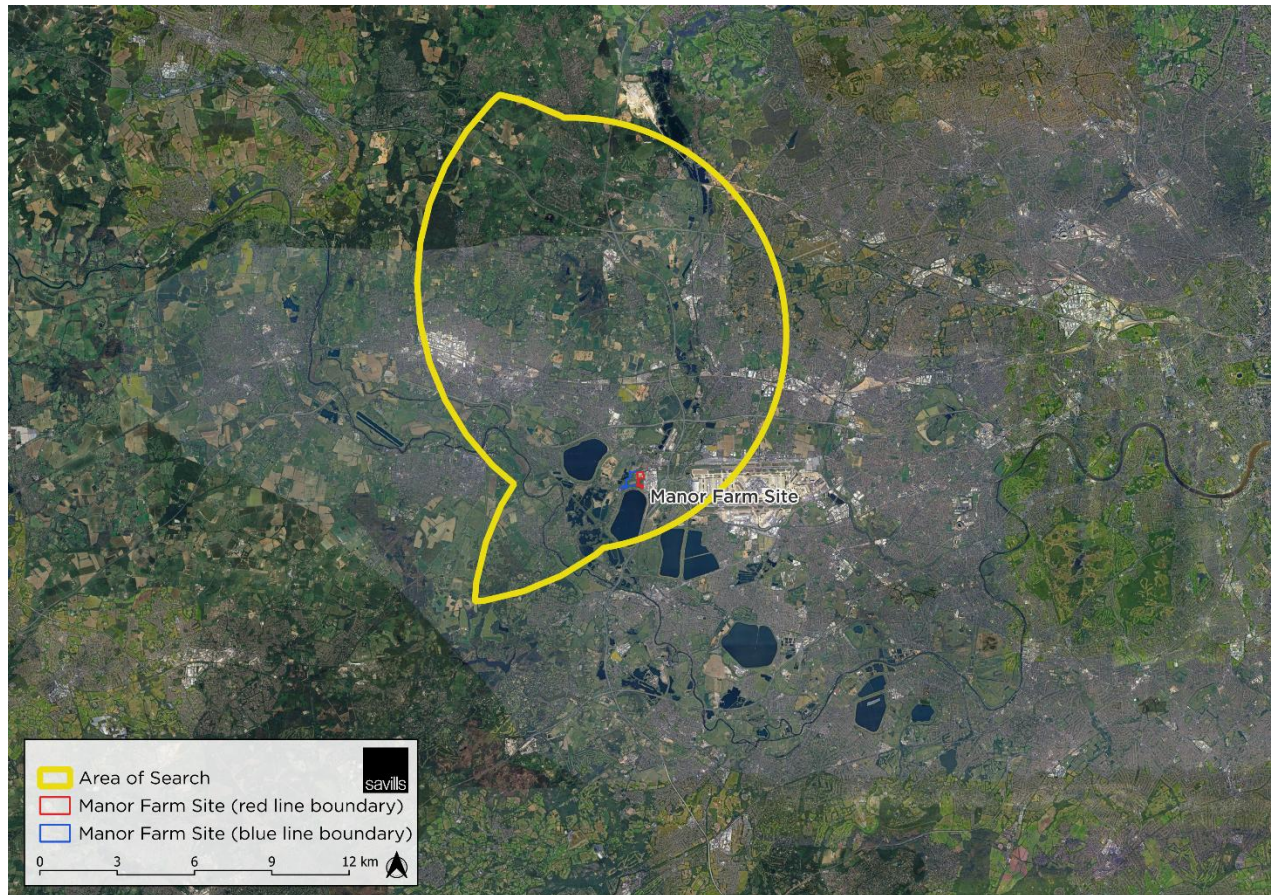


Figure 3: Final Area of Search

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.

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

Manor Farm, Poyle

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.

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	Green	Green	Green	Green	Green	Green
Area West of Denham Green	Red	Red	Yellow	Green	Green	Red
Axis, Langley (south of Langley train station)	Yellow	Yellow	Green	Green	Yellow	Green
Brett Aggregates, Slough	Yellow	Yellow	Green	Red	Yellow	Green
Cemex Site, Iver	Yellow	Yellow	Green	Green	Yellow	Green
Crown Plaza, Stockley	Red	Yellow	Yellow	Green	Yellow	Green
Former AkzoNobel Site, Slough	Yellow	Yellow	Green	Yellow	Green	Yellow
Former Colnbrook Landfill Site	Yellow	Yellow	Green	Yellow	Yellow	Green
Heathrow Distribution Centre	Yellow	Yellow	Green	Green	Yellow	Green
Land North of Allerds Road, Slough	Yellow	Red	Yellow	Green	Green	Green
Court Lane Industrial Estate, Iver	Yellow	Green	Yellow	Green	Red	Green
Land South of Hedgerley Lane	Green	Green	Green	Green	Yellow	Green
Land South of Hollybush Lane	Green	Green	Yellow	Green	Yellow	Green
Dromenagh Farm	Green	Yellow	Yellow	Green	Green	Yellow
Land to the East of Bangors Road/East of M25	Red	Yellow	Green	Green	Yellow	Red
Caldicott Prep School	Red	Yellow	Yellow	Green	Green	Green
Manor Farm	Green	Green	Yellow	Green	Green	Green
North of Langley train station	Green	Yellow	Green	Yellow	Green	Red
Phase 4, Stockley Park	Green	Green	Yellow	Green	Yellow	Green
Ridgeway Business Park	Green	Green	Green	Green	Red	Green
SIFE	Green	Yellow	Green	Green	Yellow	Green
Slough Trading Estate	Green	Green	Yellow	Green	Green	Green
Thorney Business Park	Yellow	Yellow	Yellow	Green	Yellow	Green
Wapsey's Wood Landfill Site	Green	Yellow	Yellow	Green	Yellow	Yellow
West London Industrial Park, Iver Lane	Green	Green	Yellow	Green	Yellow	Red
West of Iver Heath – SE of Five Points Roundabout	Red	Yellow	Yellow	Green	Yellow	Red
West of Iver Heath (NE of Five Points Roundabout)	Yellow	Yellow	Yellow	Green	Yellow	Red

Manor Farm, Poyle

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.

- 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.

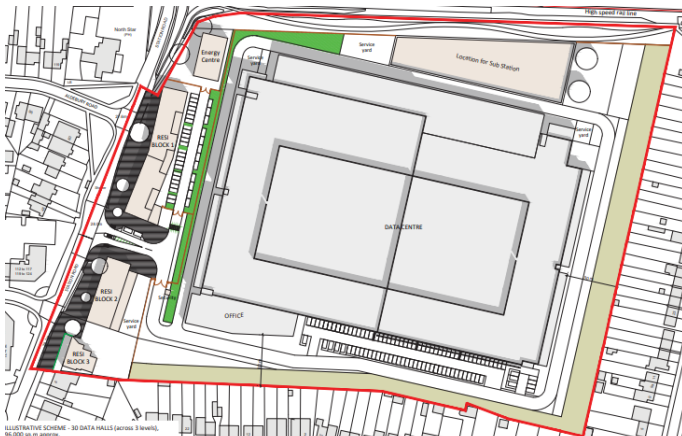


Figure 4: Indicative Site Layout – Outline Permission (ref. P/00437/93)

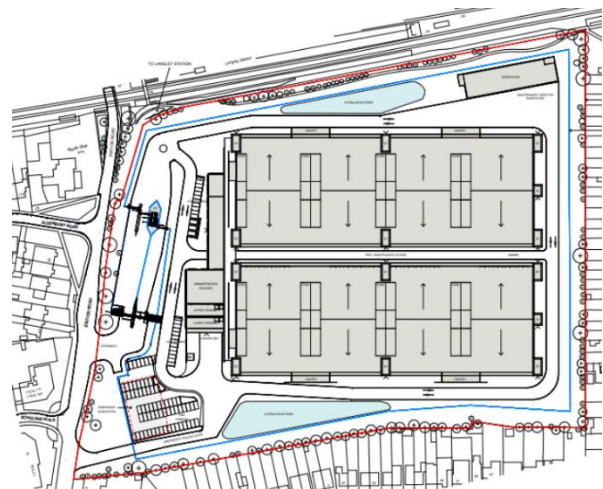


Figure 5: Indicative Layout - EIA Scoping (ref. P/00437/995)

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.

- 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.

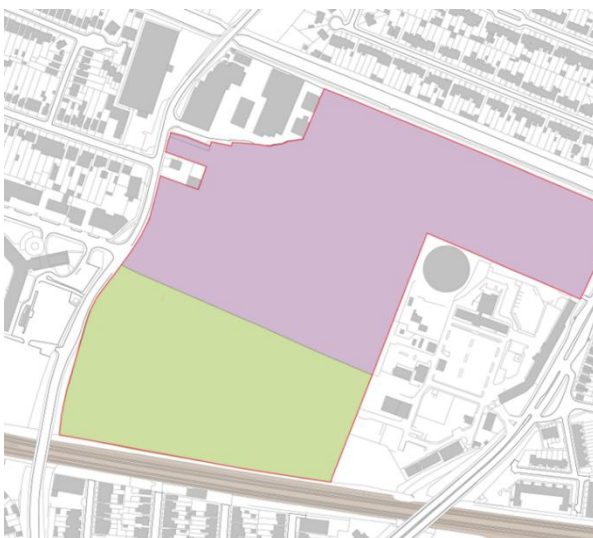


Figure 6: Approved Parameter Plan for AzkoNobel Site (ref. P/00072/096). Showing Industrial portion in purple, and residential in green

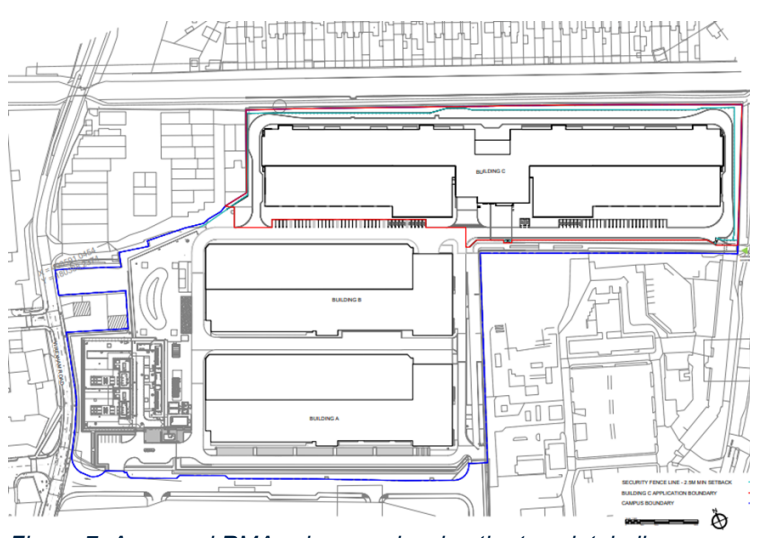


Figure 7: Approved RMA schemes showing the two datahalls approved under P/00072/108 (Buildings A & B) and under P/00072/139 (Building C)

- 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:

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.

- 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)

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.

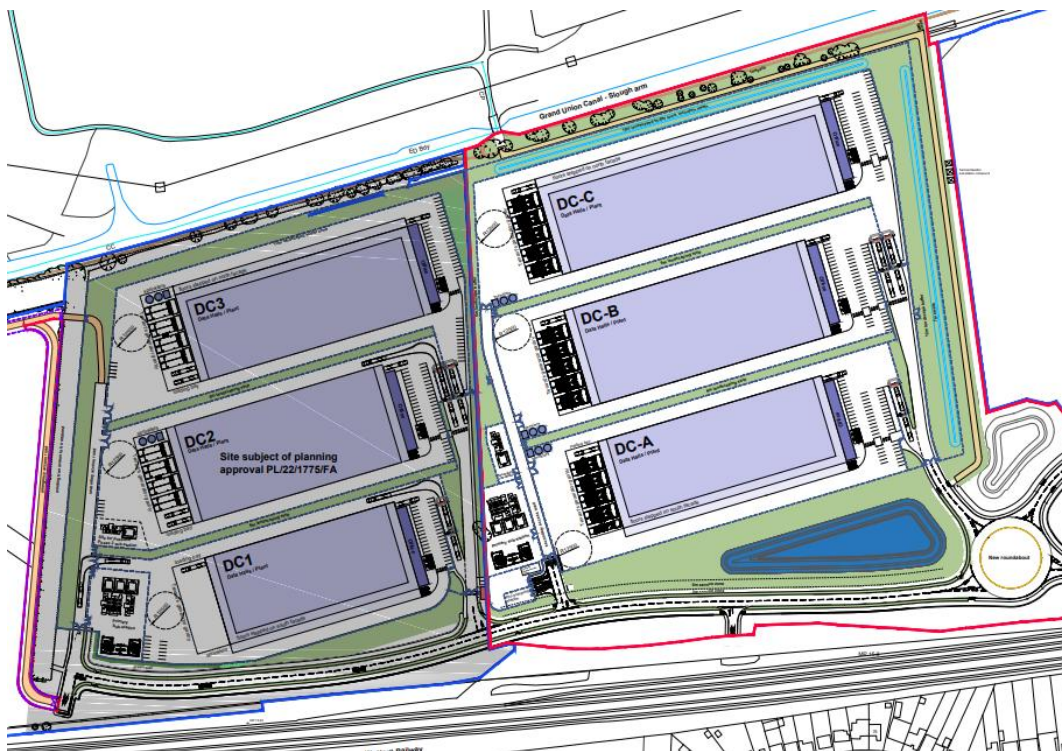


Figure 10: Proposed and approved development at Thorney Business Park, showing proposed data centres unshaded on the right (ref. PL/24/3532/O) and approved data centres shaded on the left (ref. PL/22/1775/FA)

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 courts 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.

- 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.

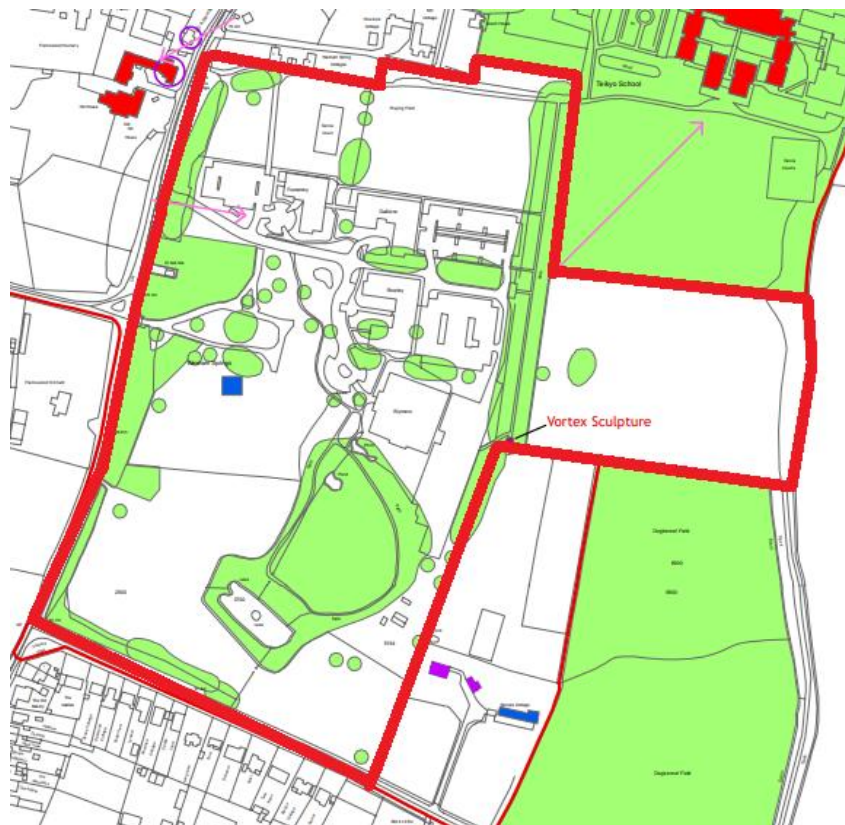


Figure 11: Extract of the Framewood Road Conservation Area Plan, showing (in green) all trees covered by a TPO at Wexham Springs. The blue square denotes the location of the Grade II listed structure.

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.

- 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 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.

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

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.

- 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 Iver 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.

- 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:

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.

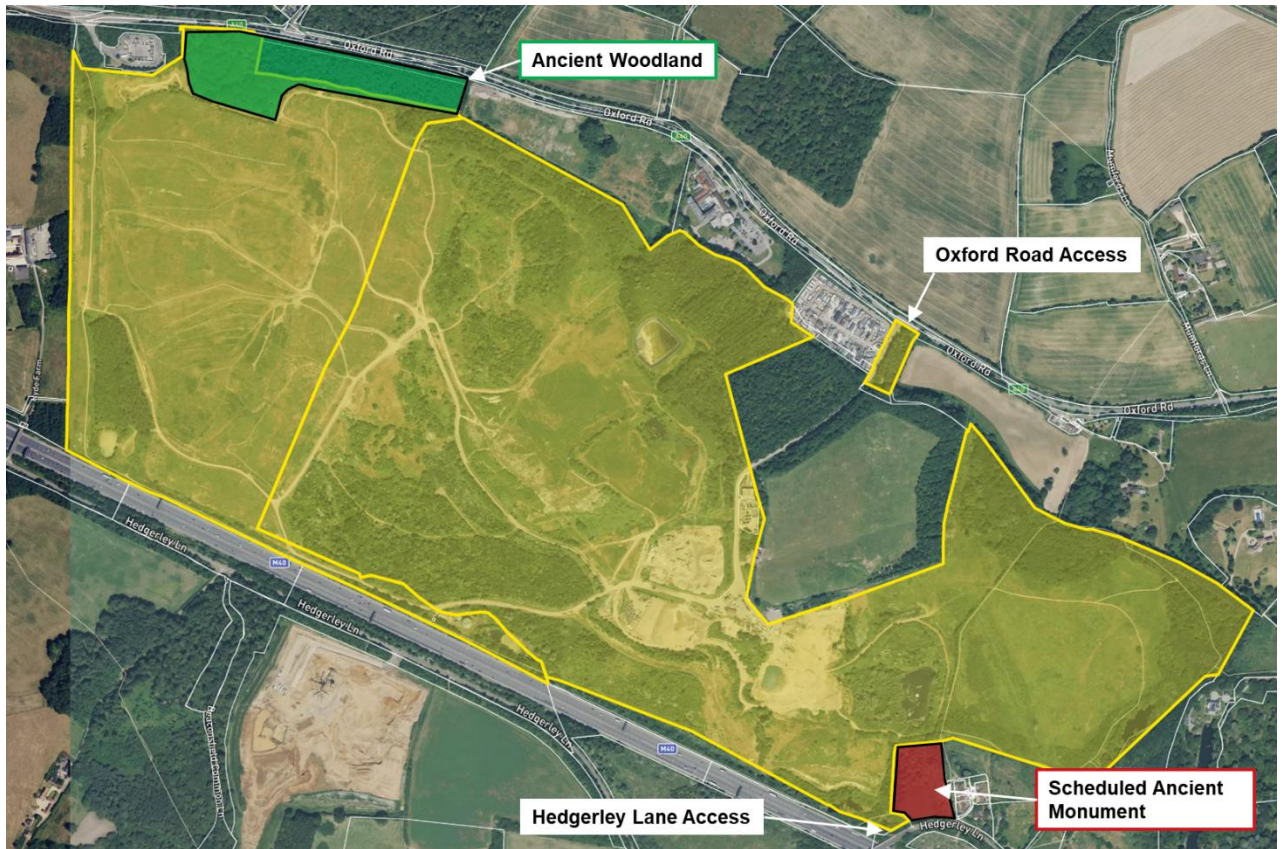


Figure 14: Wapsey's Wood Landfill, Veolia Ownership (source: Savills Maps)

- 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.

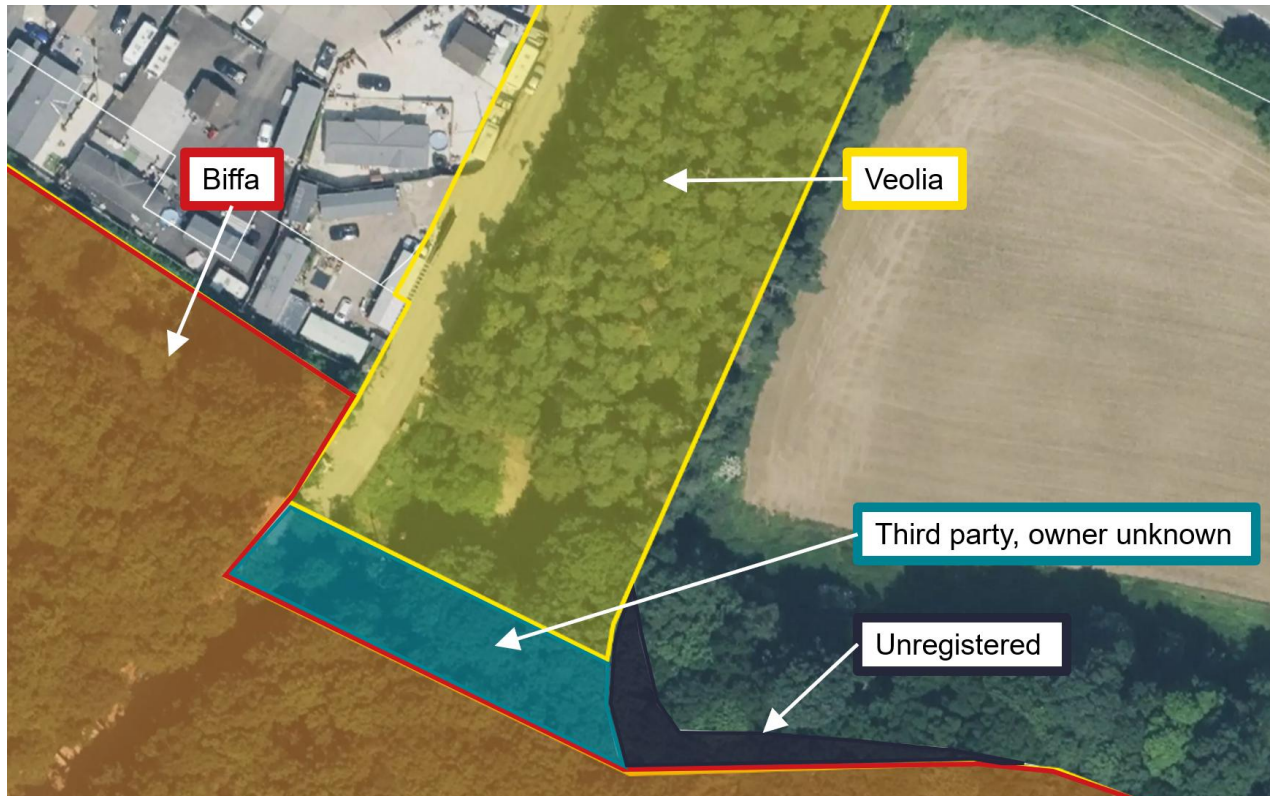


Figure 15: Wapsey's Wood Landfill, Oxford Road Access (source: Savills Maps)

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. 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.

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: <ul style="list-style-type: none"> 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	A hybrid application to comprise: <ul style="list-style-type: none"> <u>Part A</u> - A full application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve. <u>Part B</u> - 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; <u>Part C</u> - 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. 	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

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 hub building of up to 500 sq m GIA) all to be delivered in phases (each phase being a separate and severable part of the development).	Pending	Validated 03 July 2025
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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.

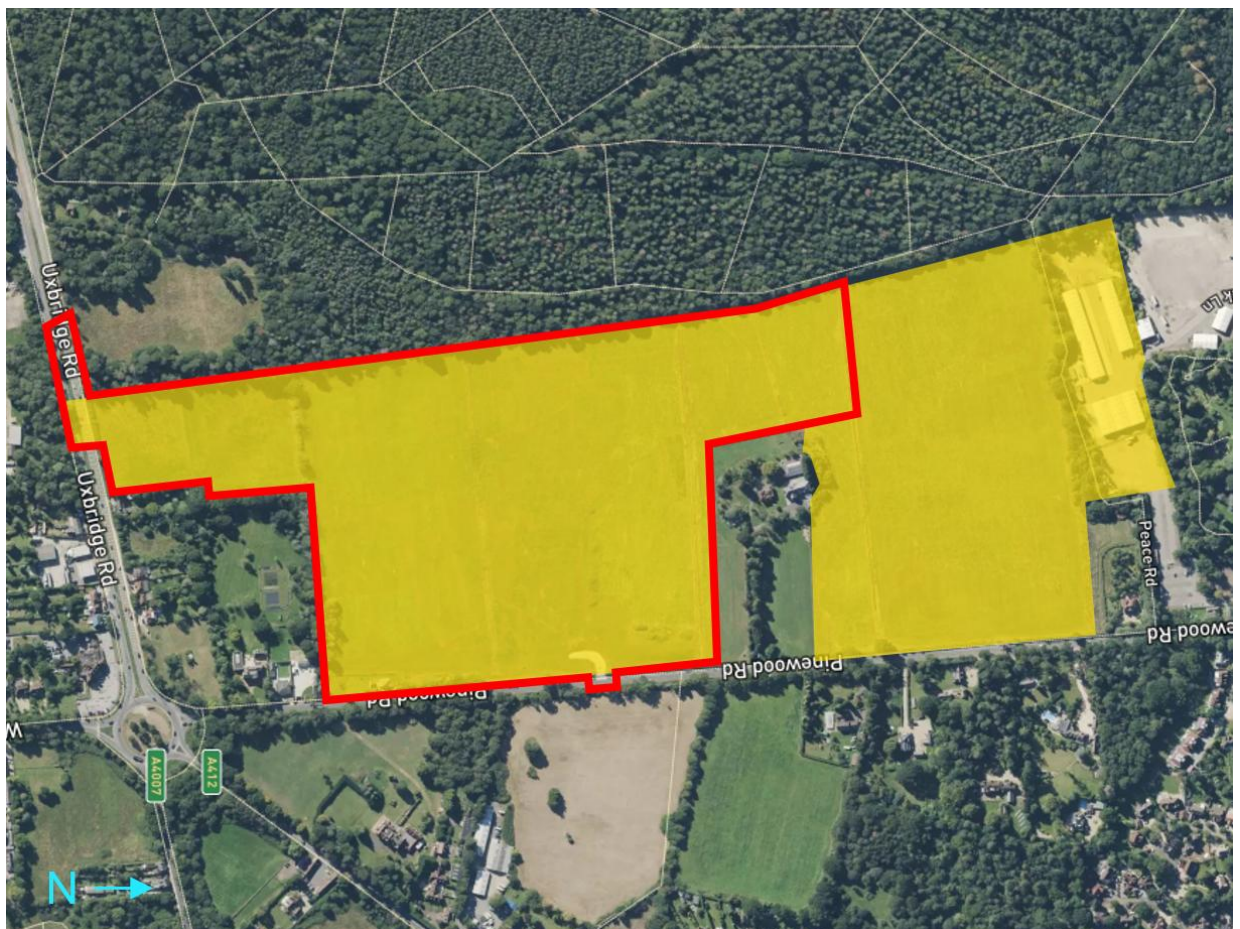


Figure 16: Land to the West of Pinewood Road. DC site (redline); area covered by other applications (yellow).

- 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

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,

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 world 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.

[...]

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.

Manor Farm, Poyle

Alternative Sites Assessment



Former Akzo Nobel Site, Slough	Site has permission for DC, and is not considered to be available.
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-studios, and a pending application for a DC. It is therefore not considered to be available.

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 no alternative sites are both available and suitable that the most sequentially preferable for the data centre element of the Development.

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Aerial Image



Site Info	
Site Name:	188-216 Bath Road
Site Area:	5.46 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is smaller than the Appeal site, but within the 10% buffer.	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>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.</p> <p>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.</p> <p>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.</p> <p>Even with the delivery of the scheme, there would still be overwhelming need for DCs in the Slough AZ.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Area SE of Iver (west of M25)
Site Area:	4.8 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is too small to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Site is not considered further, owing to failing Stage 2		

Stage 4		
Site is not considered further, owing to failing Stage 2.		
Suitable Alternative		

Aerial Image



Site Info

Site Name:	Area West of Denham Green
Site Area:	Circa 15.9 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated. Notably residential development to the east of the site with developable site area constrained by area of woodland.	Red
Visual Impact	Site is constrained, and visual impact cannot be reasonably mitigated. There is heavy mature tree cover across the majority of the site.	Red

Alternative Sites Assessment Proforma

Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has five owners, four of which are residential properties each of which own large portions of the site.	

Stage 4	
Site is not considered further, owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info

Site Name:	Axis, Langley (south of Langley train station)
Site Area:	Circa 5.96 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

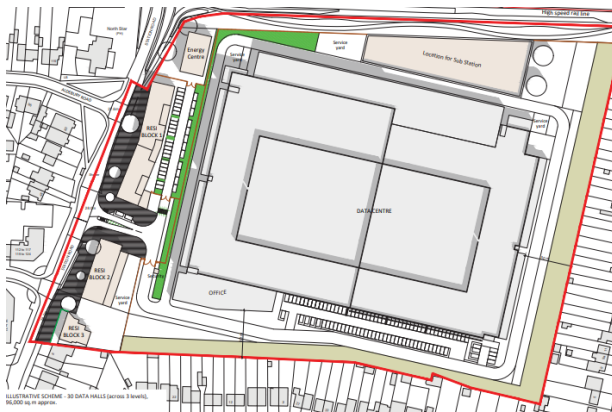
Stage 4

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.

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.

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.

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.



Aerial Image



Site Info

Site Name:	Brett Aggregates, Slough
Site Area:	Circa 24.4 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated.	Yellow
Visual Impact	Site is constrained, and visual impact cannot be reasonably mitigated.	Red
Environmental Designations	Site has no environmental constraints.	Green
Flood Risk	Built development would be located in flood zone 2 or 3	Red
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	Yellow

Alternative Sites Assessment Proforma

Ownership	Site has a single owner.	
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Stage 4		
Site is not considered further, owing to failing Stage 3.		
Suitable Alternative		

Aerial Image



Site Info

Site Name:	Cemex Site, Iver
Site Area:	Circa 28.8 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped, with minor topographical anomalies	

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>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.</p> <p>Permission was granted on 03 November 2016 under reference CM/51/16 for:</p> <p><i>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.</i></p> <p>Condition 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.</p> <p>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.'</p> <p>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:</p> <p><i>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.</i></p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Crown Plaza, Stockley
Site Area:	Circa 15.7 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated. Notably residential development beyond west boundary including rear gardens.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated.	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	

Alternative Sites Assessment Proforma

Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner	

Stage 4		
Site is not considered further, owing to failing Stage 3.		
Suitable Alternative		

Aerial Image



Site Info

Site Name:	East of Twinches Lane
Site Area:	Circa 2.96 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is too small to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3

Site is not considered further, owing to failing Stage 2.

Stage 4

Site is not considered further, owing to failing Stage 2.

Alternative Sites Assessment Proforma

Suitable Alternative	
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Aerial Image



Site Info

Site Name:	Former Akzo Nobel Site, Slough
Site Area:	Circa 12.7 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	

Alternative Sites Assessment Proforma

Ownership	Site has between two and four owners.	
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Stage 4

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

The site benefits from several planning permissions for comprehensive redevelopment, and is therefore not considered to be available.

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.

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 data centre 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 1: Approved Parameter Plan for AzkoNobel Site (ref. P/00072/096). Showing Industrial portion in purple, and residential in green

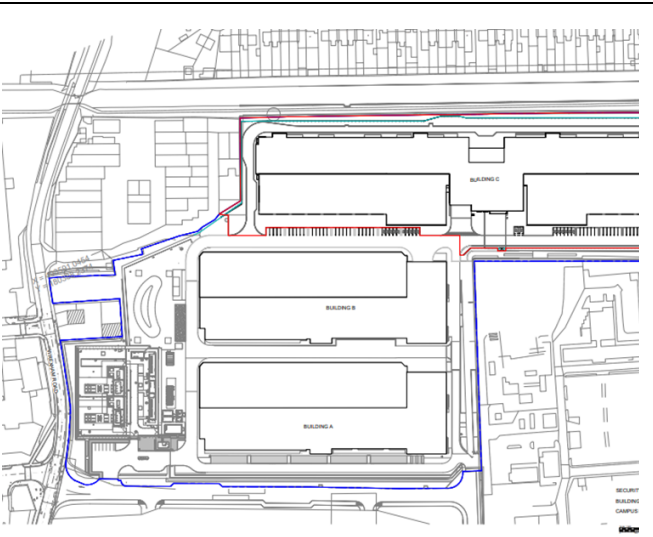


Figure 2: Approved RMA schemes showing the two datahalls approved under P/00072/108 (Buildings A & B) and under P/00072/139 (Building C)

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.

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.

Suitable Alternative



Aerial Image



Site Info

Site Name:	Former Colnbrook Landfill Site
Site Area:	Circa 39.4 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	Yellow
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	Yellow
Environmental Designations	Site has no environmental constraints.	Green
Flood Risk	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.	Yellow
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	Yellow
Ownership	Site has a single owner.	Green

Alternative Sites Assessment Proforma

Stage 4	
<p>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.</p> <p>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.</p> <p>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.</p> <p>The site constitutes high performing Green Belt land, as set out within the Green Belt Assessment submitted with this Appeal. For this reason, the site is not a preferable alternative to the Appeal Site, and is not a suitable alternative for the Development.</p>	
Suitable Alternative	

Aerial Image



Site Info

Site Name:	Heathrow Distribution Centre
Site Area:	Circa 39.4 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has no environmental constraints..	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them..	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>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.”</p> <p>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.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info

Site Name:	Land North of Allerds Road, Slough
Site Area:	Circa 11.5 ha

Stage 1

Site identified within the Area of Search

Stage 2

Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3

Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	Yellow
Visual Impact	Site is constrained, and visual impact cannot be reasonably mitigated. The site is Green Belt land in an isolated location, and	Red

Alternative Sites Assessment Proforma

	the Development would represent an unacceptable detrimental impact on Green Belt openness.	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Stage 4		
Site is not considered further, owing to failing Stage 3.		
Suitable Alternative		

Aerial Image



Site Info	
Site Name:	Court Lane, Iver
Site Area:	Circa 6 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, and there is no potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Land South of Hedgerley Lane
Site Area:	Circa 12.1 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	

Alternative Sites Assessment Proforma

Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Stage 4	
<p>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.</p> <p>Permission was granted on 11 December 2018, under reference CM/57/15, for:</p> <p><i>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.</i></p> <p>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).</p> <p>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:</p> <p><i>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.</i></p> <p>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. 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.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Land South of Hollybush Lane
Site Area:	Circa 23.5 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	Green
Visual Impact	Site is unconstrained and not subject to visual sensitivities	Green
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	Yellow
Flood Risk	Site is entirely contained within Flood Risk Zone 1	Green
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	Yellow
Ownership	Site has a single owner.	Green

Alternative Sites Assessment Proforma

Stage 4	
<p>The site is within the Green Belt, and the Colne Valley Regional Park, as defined in the South Bucks Local Plan Proposals Map.</p> <p>The site was used for mineral extraction in the 1950s and 1960s, and later as a landfill site. An outline planning application on the site was validated 11 October 2023 (ref. PL/23/3252) for:</p> <p>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.</p> <p>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.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Dromenagh Farm
Site Area:	Circa 19.1 ha

Stage 1

Site identified within the Area of Search

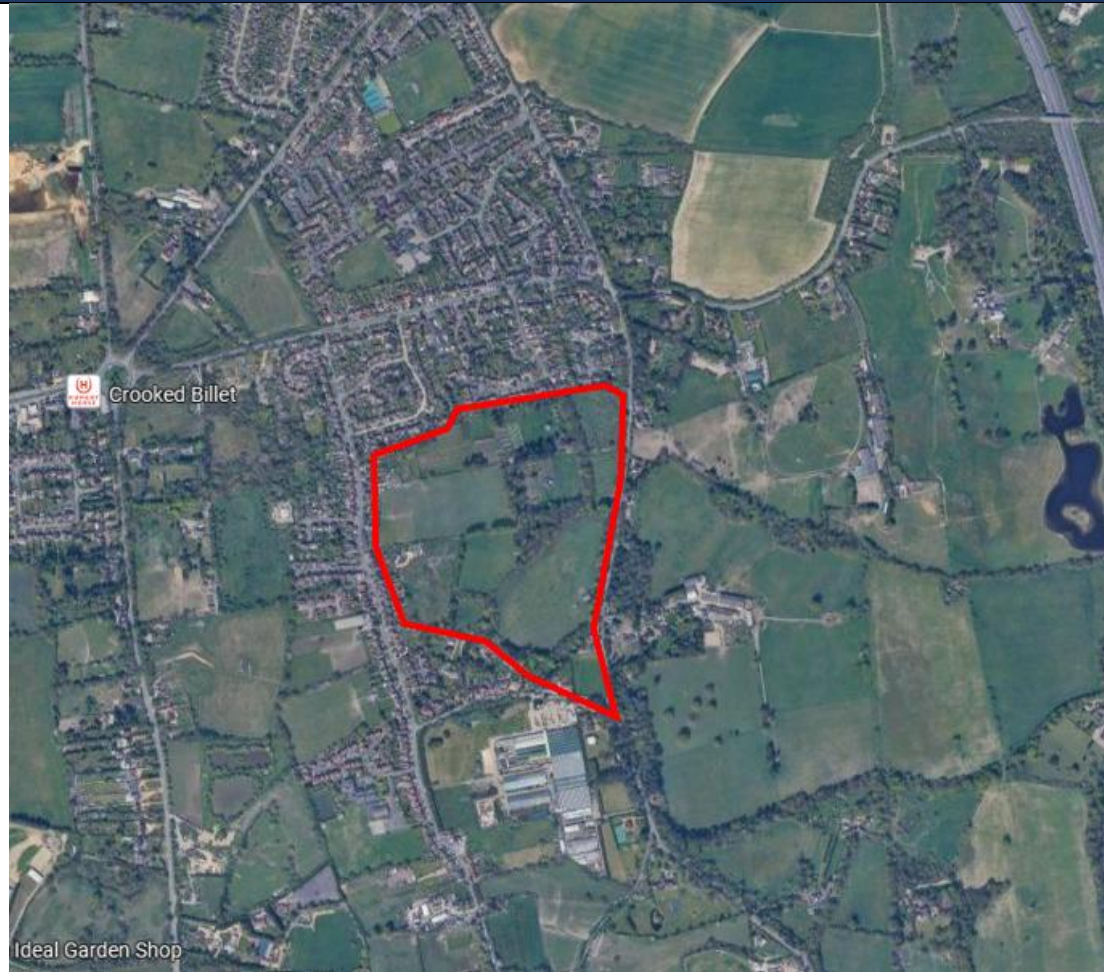
Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has between two and four owners.	

Alternative Sites Assessment Proforma

Stage 4	
<p>The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.</p> <p>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.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Land to the East of Bangors Road/East of M25
Site Area:	Circa 21.5 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has at least five owners.	

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Caldicott Prep School
Site Area:	Circa 21.8 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	

Alternative Sites Assessment Proforma

Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, and there is no potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Stage 4		
Site is not considered further owing to failing Stage 3.		
Suitable Alternative		



Site Info	
Site Name:	Link Park, Heathrow
Site Area:	Circa 4.73 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is below 5.2 ha	
Shape	Regularly shaped, with minor topographical anomalies	

Aerial Image



Site Info	
Site Name:	Manor Farm
Site Area:	Circa 8.16 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Stage 4

The site passes the three stages above and is considered to be the Preferred Site. No alternative sites are available and the site is the most sequentially preferable for the data centre element of the development.

Alternative Sites Assessment Proforma

Suitable Alternative	
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Aerial Image



Site Info	
Site Name:	North of Langley train station (Multi-let industrial estate with offices)
Site Area:	Circa 7.70 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	

Alternative Sites Assessment Proforma

Environmental Designations	Site has no environmental constraints.	
Flood Risk	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.	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has at least five owners.	

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Phase 4, Stockley Park
Site Area:	Circa 14.3 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	

Alternative Sites Assessment Proforma

Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Stage 4		
<p>The site is within the Green Belt, and an Air Quality Management Area, as defined in the Hillingdon Local Plan Proposals Map.</p> <p>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.</p>		
Suitable Alternative		

Aerial Image



Site Info	
Site Name:	Ridgeway Business Park
Site Area:	Circa 15.23 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, and there is no potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	SIFE
Site Area:	Circa 58.7 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>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. Planning permission was granted on 23 April 2024 (ref. CM/0030/23) for:</p> <p><i>Creation of infill reception facility, formation of internal haul road and ancillary works, for the temporary period of infill and restoration operations</i></p> <p>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. There is also a pending application (ref. CM/0049/21, validated 18 November 2021) on another portion of the site for:</p> <p><i>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.</i></p> <p>At the Strategic Sites Committee on 08 June, the Council resolved to grant permission pending the completion of a s106. 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. 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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Slough Trading Estate
Site Area:	Circa 197 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>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). The Estate is previously developed in full, and contains traditional I&L uses alongside existing DCs. 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.</p> <p>At present, the Estate does not have any vacant/undeveloped sites of scale, 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</p> <p>The Slough Trading Estate is subject of the Simplified Planning Zone where permission is granted for specific forms of development including Data Centres provided the proposals comply with the conditions and land use arrangements within the SPZ. This includes a building height restriction. The Data Centre component of the proposed development is 23m in height to parapet, with a maximum screen height of 30m. This rules out a significant proportion of the SPZ from being acceptable.</p> <p>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. 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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Thorney Business Park
Site Area:	Circa 43 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4	
<p>The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.</p> <p>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).</p> <p>The approved scheme comprises entirely previously developed land, the majority of the pending scheme is on undeveloped greenfield land.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Wapsey's Wood Landfill Site
Site Area:	Circa 135 ha

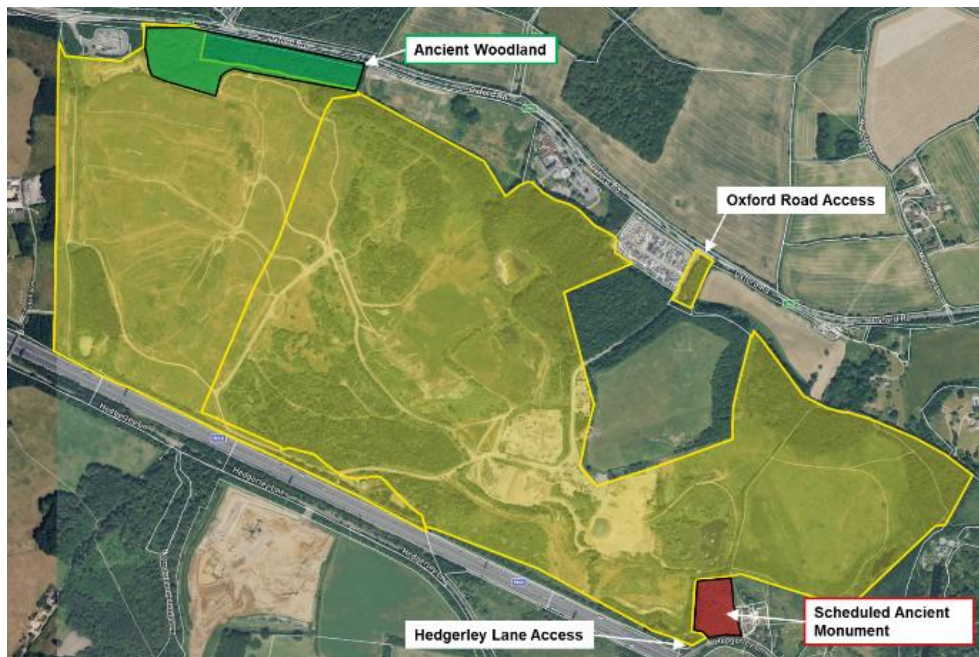
Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped, with minor topographical anomalies	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has between two and four owners.	

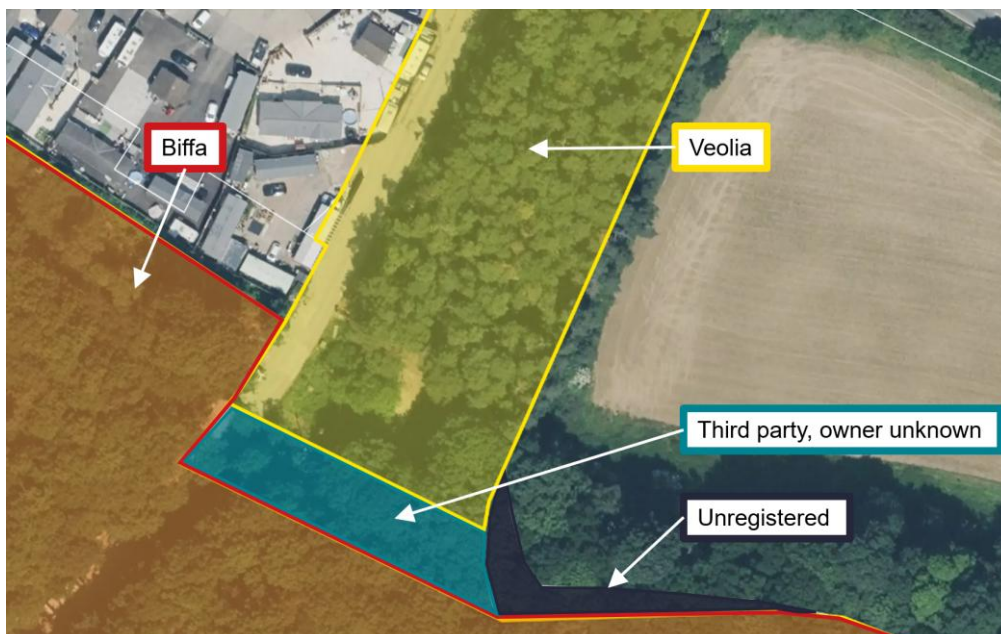
Stage 4	
The site is in the Green Belt, and contains Ancient Woodland along the northern border to the A40. There is a Scheduled Ancient Monument next to the site (Templars' Site at Moat Farm, Hedgerley). This is next to one of the two points of access.	

Alternative Sites Assessment Proforma

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.



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.



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.

Alternative Sites Assessment Proforma

It is not a suitable alternative.

Suitable Alternative



Aerial Image



Site Info	
Site Name:	West London Industrial Park, Iver Lane
Site Area:	Circa 28.3 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped, with minor topographical anomalies	Yellow

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	Green
Visual Impact	Site is unconstrained and not subject to visual sensitivities	Green
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	Yellow
Flood Risk	Site is entirely contained within Flood Risk Zone 1	Green
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	Yellow
Ownership	Site is an existing industrial area which is well occupied and has fragmented ownership.	Red

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image

Site Info	
Site Name:	West of Iver Heath – SE of Five Points Roundabout
Site Area:	Circa 32 ha

Stage 2		
Size	Site is large enough to accommodate the Development	Green
Shape	Regularly shaped and flat	Green

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses and cannot be suitably mitigated.	Red
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	Yellow
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	Yellow
Flood Risk	Site is entirely contained within Flood Risk Zone 1	Green
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	Yellow
Ownership	Site has at least five owners.	Red

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	Red

Aerial Image

Site Info	
Site Name:	West of Iver Heath (NE of Five Points Roundabout)
Site Area:	Circa 31.3 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is constrained, but visual impact can be reasonably mitigated	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has at least five owners.	

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Western International Market
Site Area:	Circa 34.5 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	

Alternative Sites Assessment Proforma

Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Stage 4	
<p>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.</p> <p>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.</p> <p>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).</p> <p>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.</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Wexham Springs
Site Area:	Circa 15.2 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Stage 4

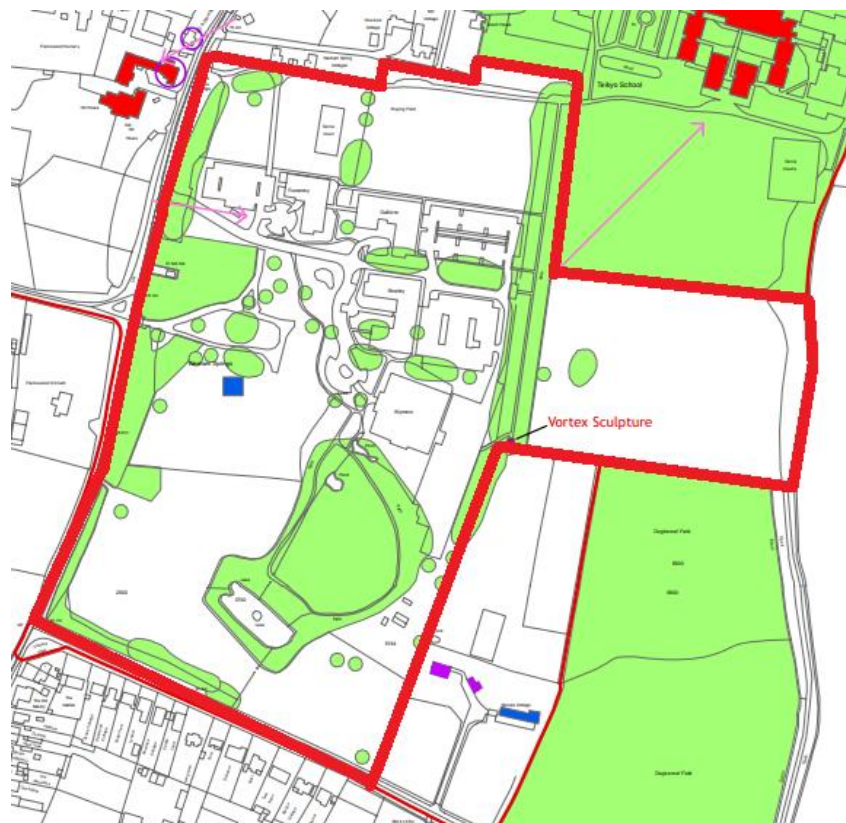
The site is partially previously developed and within the Framewood Road Conservation Area, and contains a Grade II listed structure. The portion of the site constituting developed land is in use as offices, and remainder of the site comprises gardens, woodland, and wetland. There are also tennis courts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

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”*.

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.

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.

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.



Suitable Alternative

Aerial Image



Site Info	
Site Name:	Woodlands Park
Site Area:	Circa 22.15 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	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.	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Stage 4	
<p>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.</p> <p>Outline planning permission was granted under a recovered and allowed appeal on 09 July 2025 (ref. PL/24/07754/OA) for:</p> <p><i>“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 circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, sustainable drainage systems, ancillary infrastructure and a substation”.</i></p> <p>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.</p>  <p>Extract above is Woodlands Park Site Development Strategy Plan (ref. PL/24/0754/OA)</p> <p>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.</p>	
Suitable Alternative	

Aerial Image



Site Info	
Site Name:	Land South of Slough Road
Site Area:	Circa 16.5 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	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.	
Access Arrangements	Site does not have two separate points of access, but there is potential to satisfactorily provide them.	
Ownership	Site has a single owner.	

Alternative Sites Assessment Proforma

Stage 4

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.

An EIA Screening Request was validated 08 April 2025 (ref. PL/25/1155/EIASR) to establish whether the proposed development of a Data Centre constituted EIA development. The response provided on 28 May 2025 stated that an EIA was not required.

The site is bisected east-west by Colne Brook, which is in Flood Zone 3, there is currently 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 which is third party land. The site is also constrained by overhead power lines from the Iver Substation to the north.

Owing to these site constraints, the information submitted with the EIA screening request proposed a scheme that focussed development to the south of the site, and did not provide a secondary access point.



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.

The site is not preferable to the Appeal site on these grounds, and is not a suitable alternative.

Suitable Alternative

Aerial Image

Site Info	
Site Reference No.	35
Site Area:	41 ha

Stage 1	
Site identified within the Area of Search	

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is not close to incompatible land uses.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has environmental constraints, but can be satisfactorily mitigated.	
Flood Risk	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.	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site is an existing industrial area which is well occupied and has fragmented ownership.	

Alternative Sites Assessment Proforma

Stage 4	
Site is not considered further owing to failing Stage 3.	
Suitable Alternative	

Aerial Image

Site Info	
Site Name:	Land to the West of Pinewood Road
Site Area:	Circa 22.15 ha

Stage 1

Site identified within the Area of Search

Stage 2		
Size	Site is large enough to accommodate the Development	
Shape	Regularly shaped and flat	

Stage 3		
Proximity to Sensitive Uses	Site is close to sensitive uses, but can be suitably mitigated.	
Visual Impact	Site is unconstrained and not subject to visual sensitivities	
Environmental Designations	Site has no environmental constraints.	
Flood Risk	Site is entirely contained within Flood Risk Zone 1	
Access Arrangements	Site already has two clearly separate points of access.	
Ownership	Site has a single owner.	

Stage 4

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.

Alternative Sites Assessment Proforma

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.

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.

Ref.	Description of Development	Decision	Date
PL/20/3280/OA	<p>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:</p> <ul style="list-style-type: none"> • 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	<p>A hybrid application to comprise:</p> <ul style="list-style-type: none"> • <u>Part A</u> - A full application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve. • <u>Part B</u> - 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; • <u>Part C</u> - 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. 	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	Approved	26 June 2025

Alternative Sites Assessment Proforma

	partially discharge conditions 7, 12, 13 and 32 pursuant to the outline consent		
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 hub building of up to 500 sq m GIA) all to be delivered in phases (each phase being a separate and severable part of the development).	Pending	Validated 03 July 2025

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.

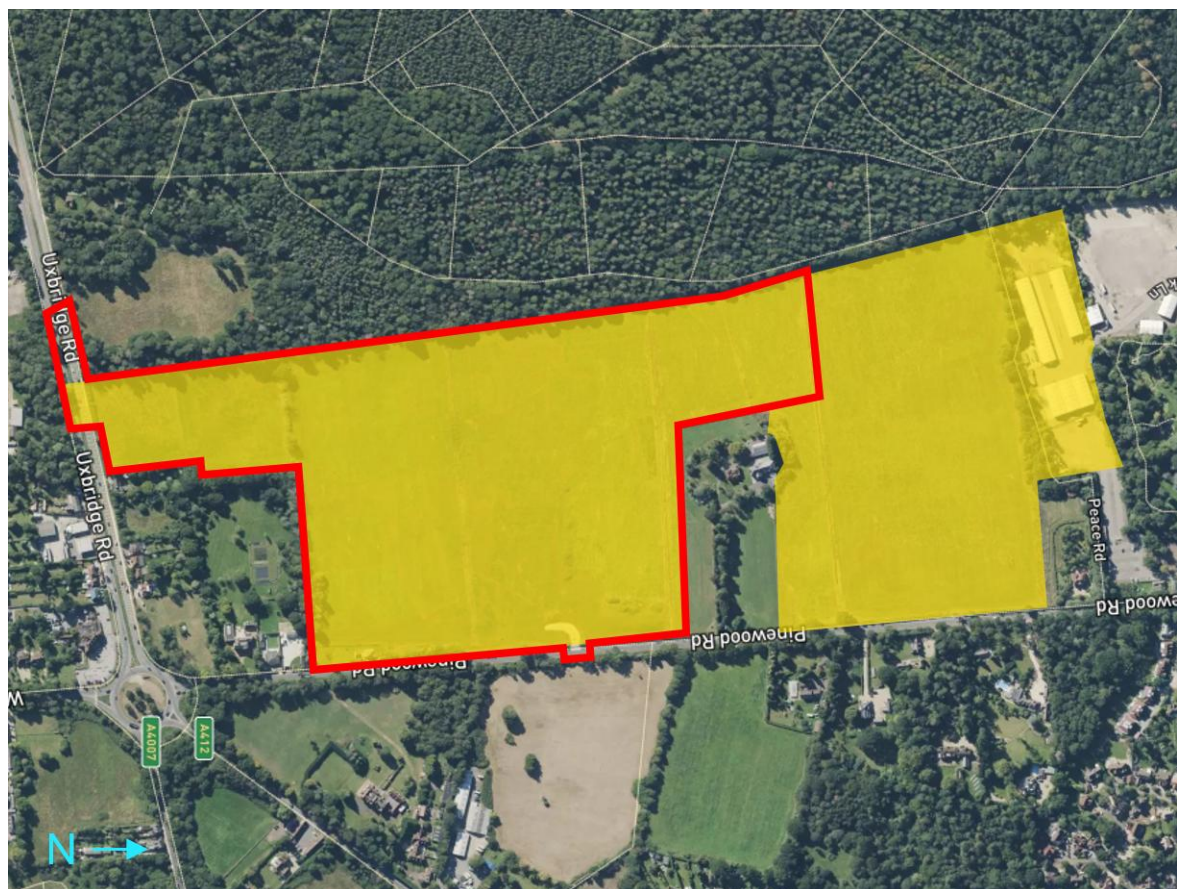


Figure 1: Land to the West of Pinewood Road. DC site (redline); area covered by other applications (yellow).

Alternative Sites Assessment Proforma

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

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

Many pre-commencement conditions were attached to the decision, not all of which appeal to have been discharged.

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

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.

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

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

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, 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.

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.

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 world 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.

[...]

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.

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.

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

Alternative Sites Assessment Proforma

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.

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.

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.

Suitable Alternative	
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Appendix 2: Summary of Colliers ASA Feedback from Slough Borough Council and Coverage within Savills ASA/Appeal Documents

Summary of Colliers ASA Feedback from Slough Borough Council and Coverage within Savills ASA/Appeal Documents

Note – text within the ‘Feedback from SBC within SoC’ column has been reproduced from the Statement of Case [CD. 10].

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
1	The starting point for the Assessment is that any alternative must exactly replicate the Appeal proposal. This is not the correct approach. Some flexibility has to be applied to see whether there are alternative sites that could accommodate this <u>type</u> of development	6.20	The Colliers ASA used a 8.16 ha (20.16 acre) minimum site size – i.e. the entire site area, whereas the Savills ASA relates to the Data Centre aspect of the development only and applies a further 10% buffer for flexibility purposes.	ASA Section 4.1 – 4.3
2	<p>As a result the Appellant’s Alternative Site Assessment is fundamentally flawed because it does not do this. It only looks for sites which exactly replicate the Appeal proposal. This means that, amongst other things, it only looks for sites with a minimum site area of 25 acres so that the battery storage facility can be accommodated as well.</p> <p>It only looks for sites that can be supplied by the Iver and Laleham electrical substations because this is what the Appeal scheme currently has an option for. It also looks at sites that can be delivered by 2027 because that is what the Appeal proposal is contracted to do.</p>	6.21	<p>This has been addressed by considering only the DC aspect of the proposal on a reduced site area, as explained above.</p> <p>Furthermore, instead of looking for sites that can be supplied by both the Iver and Laleham electrical substations, we consider the possibility that a site could connect to either substation separately.</p> <p>In respect of timescales, the Savills ASA does not consider delivery explicitly and this did not influence the selection of sites at the start of the process, but once sites were filtered down after applying the various stages set out in the ASA, availability is then an important factor to be considered, with timescales being a key element linked to wider supply.</p>	<p>ASA Section 4.1 – 4.10</p> <p>ASA Section 3.6 (Iver or Laleham)</p>
3	As a result perfectly suitable sites will be excluded because, for example, they do not have room for the battery storage facility, or because they are not deliverable in two years or don’t take their power Laleham electrical substation.	6.22	Addressed in the Savills methodology which explains the ASA adopts the conservative approach of assessing a ‘DC only’ scenario	ASA Section 4.1 – 4.10

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
4	This later requirement leads to the next fundamental flaw with the methodology. The Appellants have entered into an option to obtain power by 2027 which included taking some electricity from Laleham. Not all data centres in the area have to do the same. However, because the Alternative Sites Assessment is only looking for data centres that exactly replicate the Applicant's proposal and contractual arrangements, the methodology requires alternatives to be in close proximity to both Iver and Laleham electrical substations. This has severe implications for the size of the area of search used in the Alternative Sites Assessment.	6.23	<p>The Savills ASA considers potential alternative sites that are within an acceptable distance of the Iver <u>or</u> Laleham substation. This has led to an increased area of search in the Savills ASA.</p> <p>The grid connections secured for the development are capable of being operational from 2027 which is a unique opportunity for the Development to rapidly meet unmet need.</p>	ASA Sections 3.6, 4.1 – 4.3 and 4.10
5	Because of the unnecessary requirement for proximity to both of these substations, the Area of Search, as shown in Figure 14 of the Appellant's Alternative Site Assessment, only covers a very narrow area to the east of Slough.	6.24	The Savills ASA considers potential alternative sites that are within an acceptable distance of the Iver <u>or</u> Laleham substation. This has led to an increased area of search in the Savills ASA.	ASA Section 3.6
6	The obvious shortcomings of the very narrow area of search is that it does not cover most of Slough where most of the data centre sites are. As a result it does not pick up the availability of the site at Langley Business Centre, the former Akso Nobel site near Slough town centre or sites on the Slough Trading Estate or sites elsewhere in the Slough Availability Zone. The implications of this are explained below.	6.25	Savills has addressed all of these sites, and the area of search within the ASA is greater than the Colliers ASA.	ASA Section 4.12
7	Even if you only consider this very narrow artificial Area of Search the next fundamental	6.26	Savills ASA considers existing commercial areas within the area of search, including the Slough	ASA Section 2.11, 4.12

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	flaw with the Appellants Alternative Sites Assessment methodology is that it did not look at existing commercial areas as possible sites for data centres, despite the fact that this is where they are most likely to be provided		Trading Estate and other existing commercial sites.	
8	It did not therefore consider Thorney Business Park, which is in the middle of the area of search north of Iver station. SEGRO have recently obtained planning permission for three data centres on the western half of this site and there is a planning application for another three (90,000m2) on the eastern half	6.27	Savills ASA includes this site in the assessment.	ASA Section 6.9
9	Elsewhere within the area of search, planning permission was granted in June for 60,000m2 of data halls and a training centre on what is now called the Iver Heath Data Park which is adjacent to the M25	6.28	This is the site also known as Dromenagh Farm. Savills ASA includes this site in the assessment.	ASA Section 6.8
10	This is close to Pinewood Studios, which is also in the area of search. A planning application (PL/25/2076/OA) has just been submitted there for a 53,000m2 hyperscale data centre.	6.29	Savills ASA includes this site in the assessment.	ASA Section 6.21
11	The Appellant's Statement of Case quotes two recent appeal decisions. These are for a hyperscale data centre of 163,000m2 at Woodlands Park Landfill site, Slough Road, Iver (PINS Ref: 3307420) (Appendix B.5) and a 65,000m2 data centre on Court Lane in Iver (APP/N0410/W/24/3337981) (Appendix B.6). Both of these are in the Area of Search but were	6.30	Savills ASA includes all of these sites in the assessment and has considered the approach taken on the Woodlands Park Landfill site's ASA to inform the assessment.	ASA Sections 6.16 (Woodlands Park) and 4.12 (Court Lane)

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	presumably not considered because they were a landfill site and a small industrial area			
12	As a result it can be seen that there are a number of sites within the Area of Search which are all capable of providing the type of development proposed on the Appeal site and are therefore genuine alternatives	6.31	Savills ASA includes all of these sites in the assessment.	ASA Section 4.12
13	These proposals have been talked about for a long time and so you would expect anyone who had a knowledge of the local data centre market would have considered them in carrying out the Alternative Sites Assessment	6.32	Savills ASA includes all of these sites in the assessment.	ASA Section 4.12
14	By excluding industrial and commercial sites in and around Slough, it is inevitable that the list of alternative sites is restricted to large parcels of open greenfield sites which are going to be problematic to obtain planning permission upon, particularly in the artificial and unrealistic short time period specified in the methodology	6.33	The Savills ASA methodology responds to this feedback, incorporating sites meeting relevant criteria set out within the assessment. The Savills ASA is not restricted to large parcels of open greenfield sites only.	ASA Section 4.12
15	<p>It is not considered necessary to look at the way these sites have been assessed in detail because plenty of alternatives have been identified elsewhere. Nevertheless it is interesting to look some of the reasons for rejecting sites. These include:</p> <ul style="list-style-type: none"> <i>Visual impact of proposed development and massing within the Strategic Gap</i> 	6.34	Savills ASA methodology was prepared to be broadly consistent with the Woodlands Park Landfill site in so far as it related to the Slough Availability Zone.	ASA Sections 2.12 – 2.20 and 3

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	<ul style="list-style-type: none"> • Significant amount of infrastructure work required which would adversely impact viability • Site forms of the Metropolitan Green Belt and its performance as part of the Strategic Gap was highlighted by Mr Justice Waksman. Significant emphasis placed upon encroachment and preservation of the openness of the Green Belt. • Proximity of proposed Northern/Third Heathrow Runway and realignment of A4, creating significant uncertainty for investors and occupiers of proposed development 			
16	The shortcomings of the site selection process is highlighted by the fact the Appeal Site could equally be rejected as unsuitable for all of the reasons listed above	6.35	The Savills ASA methodology sets out a robust multi-staged approach to considering potential alternative sites.	ASA Sections 2.12 – 2.20 and 3
17	In addition to the alternative sites identified in the Area of Search there are many more close by.	6.36	The Savills ASA methodology sets out a robust multi-staged approach to considering potential alternative sites.	ASA Sections 2.12 – 2.20 and 3
18	6.37 In addition to missing the availability of alternative sites in the Area of Search, the Appellants Alternative Sites Assessment failed to consider obvious locations for data centres close by.	Slough Trading Estate 6.37 – 6.40	The Savills ASA methodology recognises the status and importance of the Slough Trading Estate as featuring a significant cluster of Data Centres within the SAZ. The SAZ is the mid point of the area of search for the Savills ASA.	Sections 3.16 and 6.7

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	<p>6.38 Paragraph 3.8 of the Appellants Alternative Sites Assessment recognises that:</p> <p><i>The data centre occupiers have traditionally 'clustered' around Slough, particularly around Equinix's Internet exchange point on Slough Trading Estate. This provides an extensive ecosystem to meet the demand for network exchange services and access to multiple cloud providers.</i></p> <p>6.39 There are currently 31 data centres on Slough Trading Estate with one further data centre under construction due to complete in August 2025.</p> <p>6.40 This is one of the highest concentrations of data centres in the world and forms the Core of the Slough Availability Zone.</p>			
19	Because of the “need for hyperscale cloud providers to be in proximity to other data centres to provide resilience in the event of any failure”, Slough Trading Estate should be the starting point in the search for alternative locations for new data centres. As explained above, it was excluded from the area of search on the flawed assumption that data centres need to be in close proximity to Laleham electrical substation.	6.41	This is acknowledged within the Savills ASA that uses the midpoint of the STE as the centre of the SAZ. The area of search is for potential sites within 10km of the STE for resilience purposes. The Savills ASA considers the STE and concludes that sites are not available.	ASA Section 3.16
20	Data centres originally clustered on the Trading Estate because it contained Slough power station. Even though a second power station has	6.42	The Savills ASA considers the Slough Trading Estate where it is recognised there is a cluster of Data Centres.	ASA Section 3

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	now been built next door, the demand for electricity exceeds the output of both of them. As a result it obtains it's power from the Grid via Iver sub station, and the owners, SEGRO, have options for future supply.			
21	<p>6.43 The Council has been proactive in supporting the provision of data centres and worked with SEGRO to produce a series of Simplified Planning Zones (SPZ) for the Trading Estate. The latest one was approved in November 2024.</p> <p>6.44 This notes that Slough is an internationally recognised location for data centres and currently has around 10% of the facilities in the UK. It also recognises the role that data centres have on the Trading Estate which are essential pieces of infrastructure that play a vital role in supporting the rapidly expanding digital economy.</p> <p>6.45 The SPZ grants planning permission in advance for a number of uses including Colocation/data centres. No further detailed approvals are required and so development can take place provided it complies with the conditions, Design Code and legal agreement.</p> <p>6.46 SEGRO, the owners of the Trading Estate have confirmed that in the last 5 years, 14 data centres have been delivered on/adjacent to Slough Trading Estate, totalling c. 2 million sqft.</p>	Simplified Planning Zone 6.43 - 6.46	The Savills ASA considers the Slough Trading Estate where it is recognised there is a cluster of Data Centres and indeed that a Simplified Planning Zone is in place.	ASA Sections 3.16, 3.22 and 6.7

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
22	<p>6.47 The Trading Estate's data centre development pipeline has the ability to deliver over 4.3m sq. ft of additional data centre accommodation over the next 7 years (Appendix I.1).</p> <p>6.48 As a result there is an extensive supply of alternative sites on the Trading Estate alone which can meet the need for data centres in the Slough Availability Zone.</p>	Slough Trading Estate Development Pipeline 6.47 – 6.48	The Savills ASA considers the potential for the STE to be an alternative site. Savills do not recognise the potential for 4.3m sqft of Data Centre accommodation to be delivered in this timescale. Even in the event that all of this floorspace would be delivered then there would still be a shortfall against 'need'. For further reference please refer to Mr Powney's evidence.	Section 5 of Mr Powney's Proof of Evidence
23	There are other sites in Slough which have, or have applied for, planning permission which were not included in the Alternative Sites Assessment. These include the former Akzo Nobel site and Langley Business Centre.	6.49	Savills ASA includes all of these sites in the assessment. The Langley Business Centre site is also known as Axis Langley, South of Langley Train Station	ASA Sections 6.5 (Azko Nobel) and 6.4 (LBC)
24	There is also considerable scope for the provision of more data centres within the western part of the Slough Availability Zone in London which haven't been considered.	6.50	The Savills ASA methodology establishes an area of search derived from sites located within 10km of the Slough Trading Estate, and within 10km of either Iver or Haleham substations. Land to the west of the STE is excluded as this land is constrained by a lack of proximate power supply. This mirrors the approach of the Woodlands Park landfill site.	ASA Sections 3.4 – 3.7
25	As a result it can be seen that the Alternative Sites Assessment is fundamentally flawed both in terms of the area of search, site selection criteria and unrealistic site requirements. It was focused upon trying to find a site which exactly replicated the proposal on the Appeal site rather than	6.51	The Savills ASA methodology sets out a robust multi-staged approach to considering potential alternative sites.	ASA Sections 2.12 – 2.20 and 3

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	looking at how the type of development could be provided elsewhere.			
26	A cursory investigation of the just the artificially small Area of Search reveals that there are five sites with advanced proposals for data centres which are alternatives to the Appeal proposal. The approval of the Simplified Planning Zone on Slough Trading Estate means that planning permission has been granted for up to 20 data centres which are much better located than the Appeal Site.	6.52	Savills ASA includes all of these sites in the assessment, and a detailed assessment of the STE and its SPZ for potential alternative sites. The Savills ASA demonstrates that there are no alternative sites.	ASA Sections 4.12 onwards
27	There are other sites in Slough and an unknown quantity of sites in the rest of the Slough Availability Zone. This means that no weight should be given to the conclusion that there are no suitable alternative sites.	6.53	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the assessment concludes there are no alternative sites.	ASA Sections 4.12 onwards
28	The Appellant has not identified a potential user for the data centre and there is nothing unique about the proposal apart from the fact that there is an option for electricity supply to the site. If this isn't taken up the power can be used elsewhere by data centres in more appropriate locations.	6.54	This matter is addressed in Mr O'Reilly's evidence.	Section 9 of Mr O'Reilly's Proof of Evidence.
29	As a result it can be seen that the Appellant's Alternative Sites Assessment is fundamentally flawed and so cannot be relied upon	6.55	The Savills ASA methodology sets out a robust multi-staged approach to considering potential alternative sites.	ASA Sections 4.12 onwards
30	The Appellant's claim in paragraph 1.5 of the Statement of Case states:	6.56 – 6.57	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the	ASA Sections 4.12 onwards

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	<p><i>There are no appropriate alternative sites, and it is essential that the Development is located on the Appeal Site.</i></p> <p>This is not correct. There are 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 these are much better located than the Appeal Site and are on brownfield sites. The Appeal Site does not have any unique qualities.</p>		assessment concludes there are no alternative sites.	
31	As a result the “need” for the development should not be given any weight in the planning assessment of the proposed development on the Appeal site.	6.58	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the assessment concludes there are no alternative sites. Please refer to Mr Powney’s evidence on ‘need’.	Section 5 of Mr Powney’s Proof of Evidence.
32	The fact that there is no need for the development to be located in this area is a significant factor to be considered when assessing its impact upon the Green Belt, Strategic Gap and Colne Valley Park	6.59	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the assessment concludes there are no alternative sites.	ASA Sections 2.12 – 2.20
33	As set out above, there is not a demonstrable need for a data centre in this location because the demand for this type of development can be met upon numerous other sites in the Slough Availability Zone which are better located and are generally on brown field sites within the urban area. As a result, even if the site is classed as “Grey belt”, the lack of any need for the development in this location means there is no	6.147	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the assessment concludes there are no alternative sites. Please refer to Mr Powney’s evidence on ‘need’.	Section 5 of Mr Powney’s Proof of Evidence.

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	justification for causing any harm to the Green Belt.			
34	No alternative sites assessment has been carried out for the Battery Storage facility apart from being part of the data centre site. As a result it has not been demonstrated that it is “essential to be in that location”.	6.228	<p>The Battery Energy Storage System is not included within the Savills Alternative Sites Assessment as this would only be a hypothetical exercise. This is considered to be a strength of the exercise to demonstrate flexibility as in theory an alternative data centre proposal would not include the BESS.</p> <p>For further analysis on why the BESS is required please refer to Mr O'Reilly's Proof of Evidence.</p>	Section 7 of Mr O'Reilly's Proof of Evidence.
35	The flawed methodology in the Alternative Sites Assessment meant that the Trading Estate was not included in the area of search and so cannot be relied upon. The supply of sites which is enabled by the SPZ, along with other sites means that the need for data centres can be met previously developed brownfield sites within the urban area.	6.232	The Savills ASA follows a robust methodology to consider potential sites in the SAZ and the assessment concludes there are no alternative sites.	ASA Section 6.7
36	As explained above, there is no overriding need for the proposed data centre which could be accommodated upon numerous alternative sites which are not in the Colne Valley Regional Park. The applicants have not been able to demonstrate why it is “essential to be in this location”.	6.246	Please refer to Mr Powney's evidence on 'need' within the SAZ.	Section 5 of Mr Powney's Proof of Evidence.
37	Another risk to the delivery of the multimillion-pound project is the uncertainty about the future of the site as result of the proposed third runway	6.249	Please refer to Mr Murphy's evidence on the Heathrow third runway.	Issue 6 in Mr Murphy's Proof of Evidence

No	Feedback from SBC within SoC	Section of SBC SoC	Savills Response	Reference to ASA Section / Appeal Documentation
	<p>at Heathrow. One of the reasons that a number of sites were rejected in the Alternative Sites Assessment was because:</p> <ul style="list-style-type: none"> <i>Proximity of proposed Northern/Third Heathrow Runway creating significant uncertainty for investors and occupiers of proposed development</i> 			

Appendix 3: KL Grant Consulting Ltd Review of Aircraft Crash Risks

Executive Summary

Manor Farm Propco Limited are seeking planning permission for a proposed data centre development at Manor Farm, Colnbrook. This technical note has considered if the location of the site in relation to the flight paths to and from London Heathrow Airport would expose the data centre development to any significant third-party aircraft crash risks and the associated impacts on data centre system availability.

The site is located outside of the Public Safety Zones at London Heathrow Airport and outside of the 10^{-5} individual risk contours determined by NATS for the Heathrow expansion to 740,000 movements, where no additional controls on land use by the Local Planning Authority are expected to be required.

The aircraft third party crash risk at the proposed Manor Farm data centre site has been estimated as 1×10^{-5} per annum for both current and potential future operations in the event that Heathrow expansion proposals go ahead. On this basis, third party crash risks at the site are estimated to be approximately 5 times higher than the background crash risk that would apply to a similar site located anywhere within England, away from airfields.

The data centre operators are likely to have unique criteria for assessing data centre reliability as this will be dependent on how systems are designed and backed up. It is evident that at an estimated likelihood of 1×10^{-5} per annum corresponding to a return period of 1 in 100,000 years, that an aircraft crash at the Manor Farm data centre site would be a very rare event.

Introduction

Manor Farm Propco Limited are seeking planning permission for a proposed data centre and battery energy storage system development at Manor Farm, Colnbrook. The site lies approximately 2 km to the west of the western end of the northern runway at London Heathrow Airport. An aviation safeguarding assessment of the Proposed Development was submitted to support the planning application [1]. This addresses any potential impacts of the Proposed Development on the safety and efficiency of flight operations and London Heathrow Airport and concluded there were no significant impacts. Subsequently, from a data centre operational perspective, there is a need to understand if the location of the site in relation to the flight paths to and from London Heathrow Airport would expose the data centre development to any significant third-party crash risks and the associated impacts on system availability. This technical note addresses these concerns.

Aircraft crash risk near airports

Aircraft crashes are rare events but those that do occur take place predominantly during take-off and landing, along flight paths and close to the ends of runways. The aircraft crash risks in those locations are therefore elevated to some extent above the more general background elsewhere.

This elevated risk is formally recognised in UK Public Safety Zone (PSZ) policy [2], which places controls on new developments near airports across defined areas near runways and associated flight paths. It is also recognised in the context of the siting of sensitive developments, including nuclear and major hazard chemical and storage facilities. It is also a potential issue for facilities with high service reliability requirements and as such may be a relevant consideration in the siting of data centres although it is expected that data centre operators may have different criteria and tolerance for site specific risks, depending on the diversity built into the systems through backups. Nevertheless, given the proximity of the proposed Manor Farm data centre to London Heathrow Airport, a review of the aircraft crash risks at the site has been undertaken.

UK National PSZ Policy

There is a general presumption against new or replacement development, or changes of use of existing buildings, within defined Public Safety Zones (PSZ) at the end of runways. Under PSZ policy, the Secretary of State regards the maximum tolerable level of individual third party risk of being killed as a result of an aircraft accident as 1 in 10,000 per year. Where the 1 in 10,000 individual risk contour extends beyond the airport boundary and includes occupied properties, PSZ policy seeks the clearance of those properties.

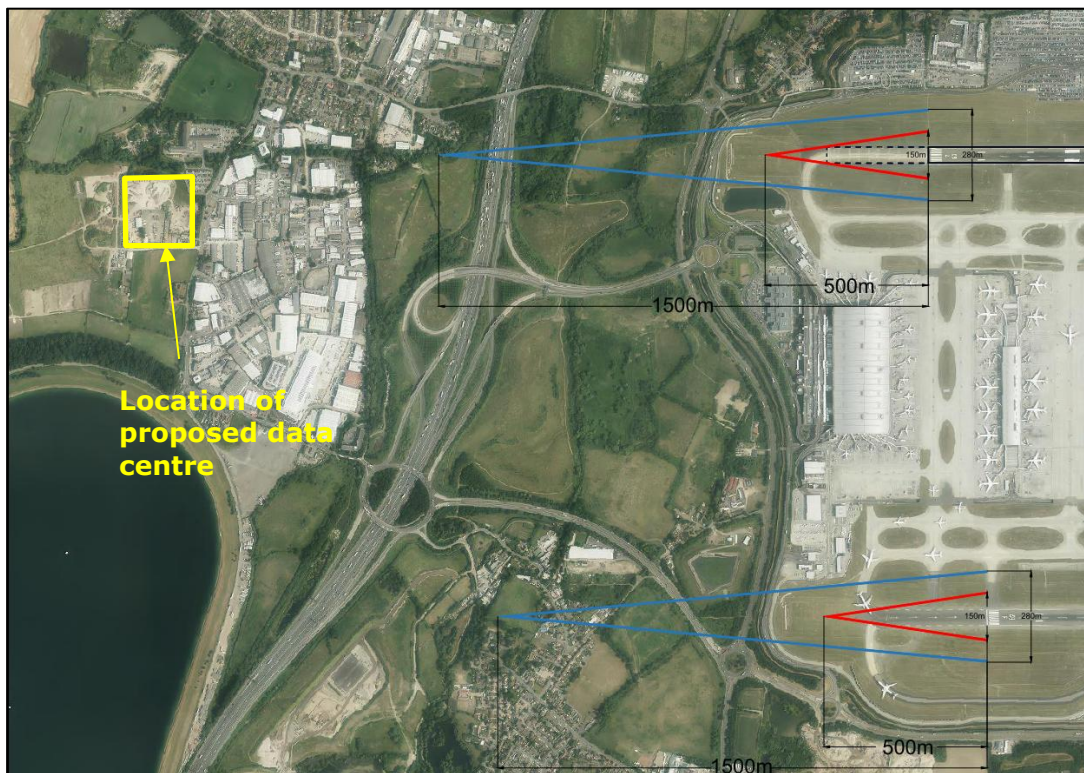
In 2021, the Department of Transport updated their PSZ Policy [2] and the method for calculating the extent of PSZs has been changed. PSZ sizes are no longer based directly on aerodrome specific third party risk contours. It is understood that the motivation for changing the PSZ definitions were both to remove the need for continuous risk assessment by NATS and take account of advances in aircraft safety which were not explicitly being addressed by the NATS contour modelling.

Based on the current planning consent for up to 480,000 annual movements and potential growth to 740,000 annual movements, the dimensions of the two PSZs that apply at Heathrow Airport are:

- PSRZ: Length = 500 m from threshold, Width = 75 m either side of runway centreline
- PSCZ: Length = 1,500 m from threshold, Width = 140 m either side of runway centreline

Figure 1 shows the PSZs at the western end of the existing runways at London Heathrow Airport [3] in relation to the proposed data centre development at Manor Farm.

Figure 1: PSZs at western end of Heathrow runways



It is evident that the proposed data centre site is located well beyond the extent of the PSZs, where no additional controls on land use by the Local Planning Authority are expected to be required. Whilst the focus of PSZ policy is on public safety, it is reasonable to expect that from a planning policy perspective, the third party crash risks outside of the PSZs are sufficiently low to not warrant any control on land use.

Aircraft Crash Risks

The site-specific crash risks in the vicinity of airports can be estimated quantitatively by using an empirical modelling approach [4], based on historical accident data, that characterises risk by reference to three key parameters as follows:

- The likelihood or probability (frequency per annum) of an aircraft crash occurring during take-off or landing operations, anywhere in the vicinity of an airport, having regard to the number of movements and the inherent reliability of different aircraft types, as determined from the available crash statistics;
- The probability of impact at any specific location at or near an airport relative to the runway end and the extended centreline, as described by the crash location distribution, determined by reference to crash locations in the historical accident data set;
- The severity of the consequences of an impact on the ground, according to the size of the aircraft concerned and again determined by reference to the historical accident data set.

Airport related crash probabilities

Estimates for the crash risk at the Manor Farm site can be made by reference to recent studies undertaken in the context of the planned expansion at London Heathrow Airport. In 2015, the Health and Safety Laboratory were commissioned by the Airport Commission to undertake a study to consider the potential increase in aircraft crash risks in the vicinity of Heathrow and Gatwick airports as a result of proposed airport expansion [5]. A methodology to calculate the aircraft crash likelihood was developed following a review of the literature and an analysis of the available data. This involved calculating a background crash rate for five different categories of aircraft and calculating an airfield specific crash rates for Heathrow and Gatwick airports with and without proposed expansion. For Heathrow, the 'Do Minimum' scenario is relatively representative of the current situation, where Heathrow has reached full capacity capped at 480,000 annual movements and the 2050 'expansion' scenario is relatively representative of the current Heathrow Expansion proposals to increase the maximum number of movements per annum to 740,000 by the addition of a third runway. In both cases, the fleet mix consists primarily of large transport aircraft, i.e. medium to large sized jets with small transport aircraft under 2.3Te making up less than 0.01% of the fleet mix in 2013.

A mean background crash rate in England of $49 \times 10^{-6} \text{ km}^{-2} \text{ yr}^{-1}$ was estimated by statistical analysis of aircraft crash records between 1990 to 2013. The background crash rate is representative of the general crash risk from all aircraft types at sites at least 10 km from airfields, i.e. it is derived from aircraft accident data for aircraft that are not within the landing or taking-off phase of flight i.e. data centres located anywhere within England would be exposed to this background crash risk. Assuming that the Manor Farm data centre critical site area is approximately 200 m x 200 m, the background crash risk will be around 2×10^{-6} per annum, corresponding to a return period of approximately 1 in 510,000 years. The majority of this crash risk is associated with small aircraft and helicopter operations. The corresponding background crash rate for large transport aircraft, i.e. jets greater than 2.3 Te, is around 100 times smaller.

The airfield related crash rates for London Heathrow Airport of 39.1×10^{-3} and 62.5×10^{-3} per annum were also estimated by statistical analysis for the 'Do Minimum' and 'Expansion' scenarios, respectively. Furthermore, the report identifies that due to prevailing wind conditions at Heathrow airport, take-offs are to the west 70% of the time and to the east 30% of the time. Similarly, landings are from the east 70% of the time and from the west 30% of the time. These crash risks are representative of airfield related crashes within a radius of approximately 10 km from the airport (over an area of approximately 314 km²) and these estimates can be used in conjunction with crash location modelling to estimate the third party crash risks at the data centre site.

Airport Crash Location Modelling

Two distinct measures are available for characterising the third party risks estimated by airport-related crash risk models, as follows:

- individual risk: the annual probability of fatality for a hypothetical resident present at any given location relative to the runway threshold and flight path to and from it;
- societal risk: the annual probability of accidents causing any given number of fatalities in any area of development, taking account of the nature of the development, in particular the density of occupancy.

The UK DfT crash location model provides for the determination of the probability, in the event of a crash anywhere in the vicinity of the airport, of the crash being centred at any given location, defined in terms of rectilinear coordinates by the distance relative to the runway end and the runway extended centreline. The model consists of a set of four probability density functions (pdfs) [6] which represent the crash distributions associated with four separate accident scenarios as follows:

- Ground impacts from flight during take-off;
- Ground impacts from flight during landing;
- Take-off overruns;
- Landing overruns.

These empirical distributions were determined by fitting mathematical functions to the crash locations identified in the historical accident record. In order to estimate the crash risk at the Manor Farm data centre site, it is necessary to integrate the pdfs over a square area, which has been estimated to be approximately 200 m x 200 m, with the centre of this area located approximately 2,400 m to the west of the Runway 09L threshold and approximately 175 m to the south of the extended runway centreline. Utilising this approach, crash risks of 9.54×10^{-6} per annum and 1.05×10^{-5} per annum have been estimated for the 'Do Minimum' and 'Expansion' scenarios, respectively. These crash risks correspond to a return period of between 1 in 95,643 and 1 in 104,821 years. On this basis, third party crash risks at the site are estimated to be approximately 5 times higher than the background crash risk that would apply to a similar site located anywhere within England, away from airfields.

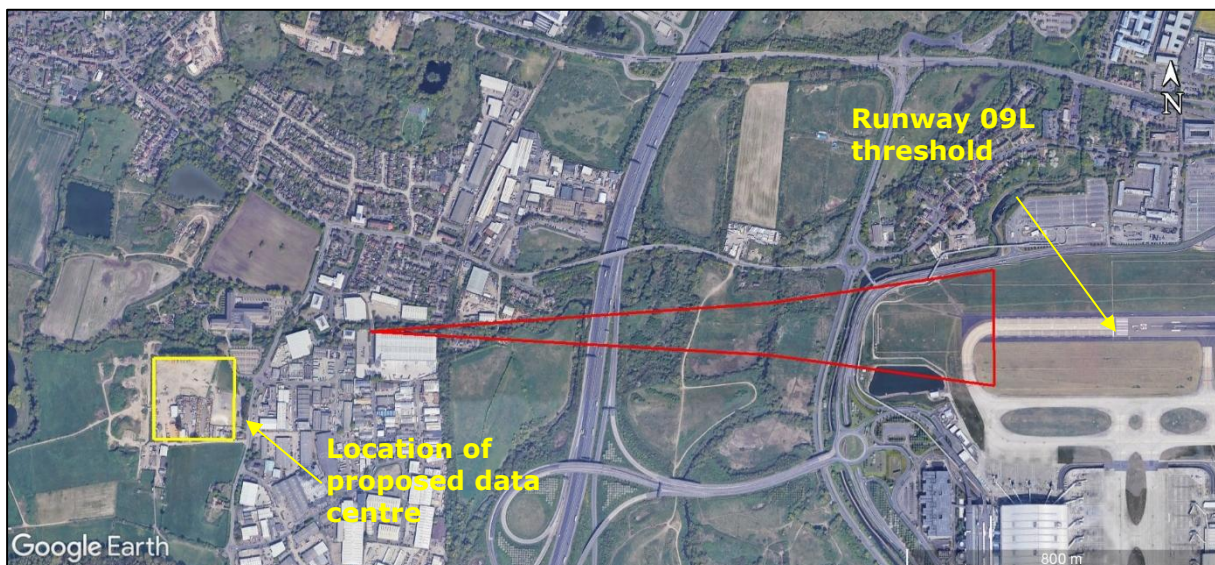
It is noted that this crash risk estimate is highly dependent on the size assumed to correspond to the critical site area, an impact of which would result in data loss. Based on the footprint of the main data centre building, a 200 m x 200 m area is conservative. For example, if a 100 m x 100 m site area is assumed, the corresponding crash risks reduce to 2.25×10^{-6} per annum and 2.47×10^{-6} per annum have been estimated for the 'Do Minimum' and 'Expansion' scenarios, respectively.

These estimated crash risks for the western end of runway 09L/27R are similar because despite the overall growth in movement numbers for the airport expansion scenario, the additional 260,000 movements per annum are expected to largely be accommodated on the new northern runway and the number of movements on the existing runways is not expected to change significantly. Given the significant lateral offset of the site from the other runways, crash risks associated with the proposed northern runway and the existing southern runway will be several orders of magnitude lower than those associated with the existing northern runway.

NATS Third Party Risk Contours

NATS historically used the DfT crash location modelling approach to determine the size of public safety zones at the end of UK runways based on assessment of the individual risk contours. Since 2021, public safety zones are no longer tailored to individual airport fleet mixes. However, prior to this change, when the Heathrow expansion proposals were first put forward, NATS carried out a third party risk assessment using this model [7], for the Heathrow expansion proposal for a third runway and 740,000 annual movements per annum. Figure 2 shows the forecasted NATS 10^{-5} PSZ 'triangle' at the end of the central runway for 740,000 forecast movements in relation to the proposed data centre location, as specified in Table 2b of the NATS report. The PSZ has been defined to represent a simplified form of the extent of the 10^{-5} risk contour.

Figure 2: NATS PSZ dimensions for Runway 09L threshold end for a 3 runway, 740,000 movements scenario



On this basis, the proposed data centre would be outside of the 10^{-5} individual risk contours derived by NATS for the Heathrow expansion scenario. This corresponds well with the risk estimates for the site using the HSL data, as the individual risks do not take account of the extent of the site area. The NATS report also contains runway splits for landing and take-offs for the expansion scenario up to 740,000 movements and confirms the assumptions that overall, the number of movements on Runway 09L/27R is not anticipated to increase significantly following the addition of a third runway. Therefore, the above PSZ triangle will also be indicative of the NATS 10^{-5} per annum individual risk contour estimates for current operations at the airport, up to 480,000 movements.

Risk Significance

The aircraft third party crash risk at the proposed Manor Farm data centre site has been estimated as 1×10^{-5} per annum for both current and maximum capacity future operations in the event that Heathrow expansion proposals go ahead. On this basis, third party crash risks at the site are estimated to be approximately 5 times higher than the background crash risk that would apply to a similar site located anywhere within England, away from airfields.

The data centre operators are likely to have unique criteria for assessing data centre reliability as this will be dependent on how systems are designed and backed up. It is evident that at an estimated likelihood of 1×10^{-5} per annum corresponding to a return period of 1 in 100,000 years, that an aircraft crash at the Manor Farm data centre site would be a very rare event.

1 KLG186/R2/Issue 2, Manor Farm: Aviation Safeguarding Assessment for Planning, KL Grant Consulting, December 2024

2 Department for Transport Policy Paper: Control of development in airport public safety zones, October 2021

3 Heathrow Public Safety Zones: 29/10/2021:

https://www.heathrow.com/content/dam/heathrow/web/common/documents/company/team-heathrow/airside/airfield-maps/Heathrow-PSZ_v8.pdf

4 Third Party Risks Near Airports and Public Safety Zone Policy: A Report to the Department by Consultants, Department of the Environment, Transport and the Regions, October 1997

5 HSE Project Number PE06376, Report MSU/2015/08, Module 14. Operational Efficiency: Ground Risk Analysis, 20th May 2015, Health and Safety Laboratory on behalf of the Airports Commission

6 A Methodology for Calculating Individual Risk Due to Aircraft Accidents near Airports, P.G.Cowell, P.B. Foot, R.J.Gerrard, D.Kent, S.M.Mason & A.Rivoire, NATS R&D Report 0007, 2000

7 Appendix 5 of Technical Submission Volume 2: Taking Britain further, Heathrow's plan for connecting the UK to growth, Heathrow Airport Limited: THIRD PARTY RISK CONTOURS AND PUBLIC SAFETY ZONES FOR THREE RUNWAYS AND 740K FORECAST MOVEMENTS AT HEATHROW AIRPORT, OA 1407, Version 1.0 FINAL, April 2014, NATS