Appendix D Preliminary Arboricultural Method Statement

Manor Farm Cable – Laleham Substation Corridor Route

Tree Survey Report & Arboricultural Impact Assessment

Juniper Energy Ltd

SLR Project No.: 402.065673.00001

September 2025

D.1 Overview

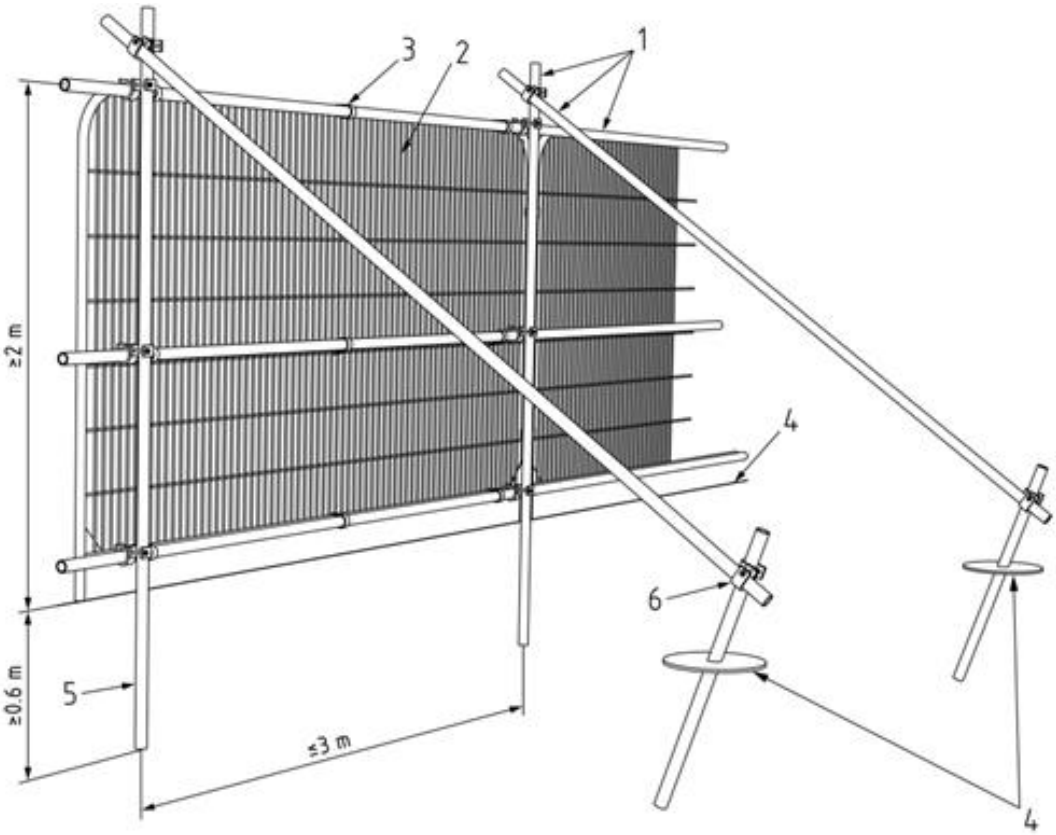
This Preliminary Arboricultural Method Statement (AMS) provides generic best practice measures to be adopted in order to protect retained trees during the development process. It has been prepared in order to inform the planning and the construction/ development process. Should a bespoke AMS be required, this shall be produced by a suitably qualified arboriculturist.

D.2 Protective Fencing

The purpose of this fencing is to provide protection to the RPAs of retained trees and tree groups. Paragraph 6.2.2.1 of BS 5837:2012 states that "*Barriers should be fit for the purpose of excluding construction activity and appropriate to the degree and proximity of work taking place around the retained tree(s). Barriers should be maintained to ensure that they remain rigid and complete.*"

The default specification for Tree Protection Fencing (extract from BS 5837:2012) shall be as illustrated in Figure D-1 below.

Figure D-1: Default specification for protective barrier (Figure 2 of BS 5837:2012)



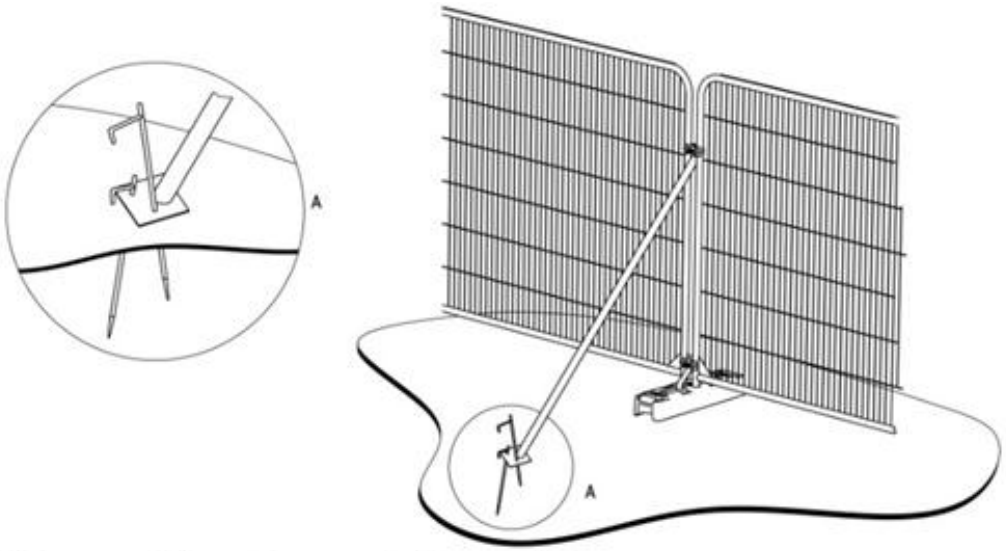
Key

1 Standard scaffold poles
2 Heavy gauge 2 m tall galvanized tube and welded mesh infill panels
3 Panels secured to uprights and cross-members with wire ties
4 Ground level
5 Uprights driven into the ground until secure (minimum depth 0.6 m)
6 Standard scaffold clamps

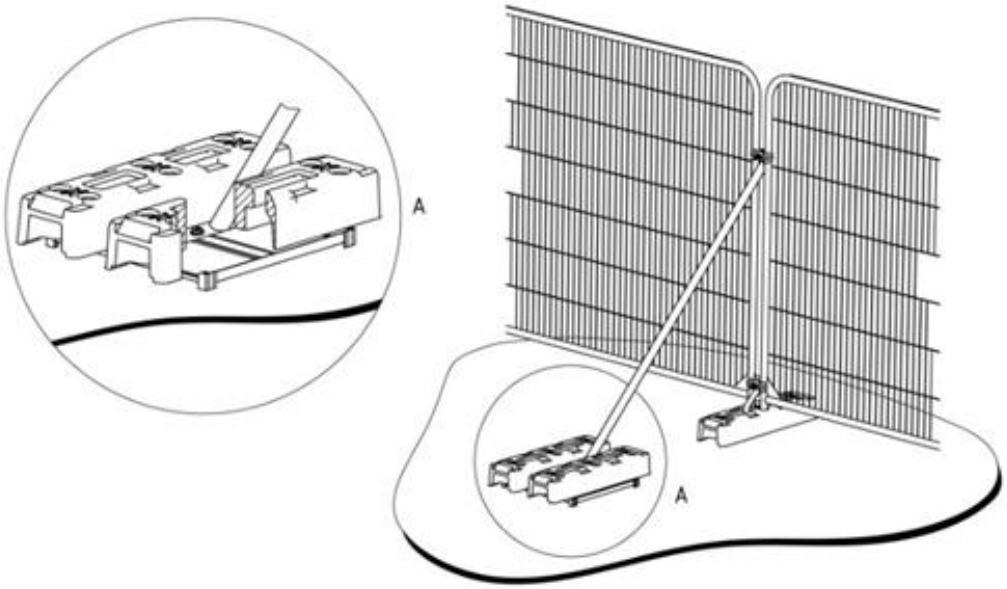
In accordance with paragraph 6.2.2.3 of BS 5837: 2012 states "*Where the site circumstances and associated risk of damaging incursion into the RPA do not necessitate the default level of protection, an alternative specification should be prepared by the project arboriculturist and, where relevant, agreed with the local planning authority*."

Where it is agreed with the local planning authority that the default specification is not necessary, the specification illustrated in Figure D-2 below, shall be used.

Figure D-2: Examples of above ground stabilising systems (Figure 3 of BS 5837:2012)



a) Stabilizer strut with base plate secured with ground pins



b) Stabilizer strut mounted on block tray

Weather-proof notices shall be attached to any protective fencing located adjacent to retained trees displaying the words "Construction Exclusion Zone" and listing restrictions which apply. All personnel must be made aware of these restrictions.

Figure D-3: Example of Protective Fencing Signs

D.3 Construction Exclusion Zones

The Construction Exclusion Zone (CEZ) is the area identified by a suitably qualified arboriculturist as the area to be protected during development, from site clearance and construction work through the use of barriers and/or ground protection to ensure the successful long-term retention of a tree. Fencing or ground protection shall not be taken down or relocated at any time without prior agreement and/or site supervision as recommended by the arboriculturist.

All areas protected by Tree Protection Fencing shall be treated as CEZs, and the following restrictions shall apply:

- No construction activity must occur within these areas.
- No works on trees unless agreed by a suitably qualified arboriculturist.
- No alterations of ground levels or conditions.
- No chemicals or cement washings.
- No excavation.
- No temporary structures.*
- No storage of soil, rubble or other materials.
- No vehicles or machinery to be used or parked without appropriate ground protection measures as per BS5837:2012. This will require the use of a proprietary system of reinforced concrete slabs/steel road plates on a compressible layer, or side butting

scaffold boards/ 18mm plywood sheets on a compressible layer. The type of ground protection used shall be appropriate for the likely loading applied.

- No fixtures (lighting, signs etc.) to be attached to trees.
- No fires within 10 metres of the canopies of any tree or hedgerow.

*Site huts, provided they are of the “Jack Leg” type, can be sited to act as ground protection for the duration of the construction.

D.4 Temporary Ground Protection

New temporary ground protection should be capable of supporting any traffic entering or using the site without being distorted or causing compaction of underlying soil. The ground protection might comprise one of the following:

- For pedestrian movements only, a single thickness of scaffold boards placed either on top of a driven scaffold frame, so as to form a suspended walkway, or on top of a compression-resistant layer (e.g., 100 mm depth of woodchip), laid onto a geotextile membrane.
- For pedestrian-operated plant up to a gross weight of 2t, proprietary, inter-linked ground protection boards placed on top of a compression-resistant layer (e.g., 150 mm depth of woodchip), laid onto a geotextile membrane.
- For wheeled or tracked construction traffic exceeding 2t gross weight, an alternative system (e.g., proprietary systems or pre-cast reinforced concrete slabs) to an engineering specification designed in conjunction with arboricultural advice, to accommodate the likely loading to which it will be subjected.

D.5 New Permanent Surfacing Within RPAs

Any new surfacing within the RPAs shall occur above ground level without soil stripping. New surfaces shall be constructed on a cellular confinement system to prevent localised compaction of the rooting medium post development. Porous geotextile membranes shall be used both above and below the cellular confinement system to prevent mixing of materials with the binding layer or the soil. The new surface needs to be permeable to air and water (resin bound gravel or similar is recommended). This is to allow roots to respire without there being a build-up of carbon dioxide, and to ensure the roots continue to receive the moisture and oxygen they require to function. Traditional kerbing requires excavation to install and will therefore not be suitable within the root protection areas of retained trees. As an alternative, haunched kerbing, treated timber edging, aluminium L-shaped edging, galvanised metal edging or no fixed edging shall be used. Construction of the new surface will require access into the CEZ defined by the temporary ground protection. The ground protection shall not be removed until new surface is installed. The root protection areas should not be left exposed during construction.

D.6 General Canopy Protection

Since the canopies of retained trees may be in close proximity to areas of plant operation, the following restrictions will apply:

- All plant will be sited outside the defined RPAs of retained trees / groups, and the appointed contractor will ensure all relevant personnel shall be made aware of the location of branches and the need to avoid causing damage to them.
- Prior to the implementation of lifting operations, a representative from the equipment supply company shall visit the site and ensure all operations can be completed without

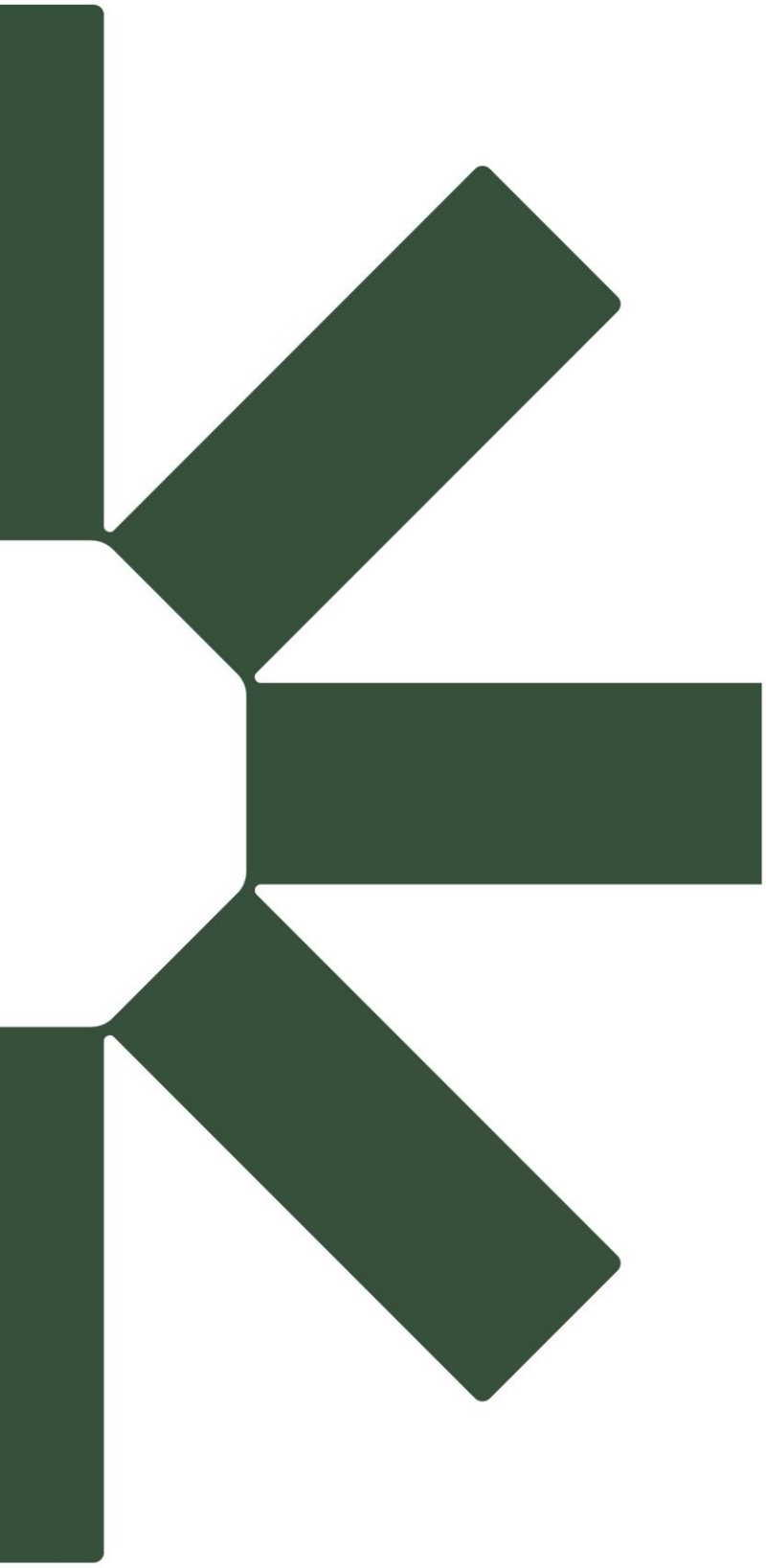
causing damage to retained trees. A lifting plan will be prepared and submitted for approval prior to all lifting operations. The lifting plan will make provision for the potential for damage of retained trees.

- All lifting operations will be completed under the close direction of a qualified banksman, who will be briefed by the appointed contractor as to the need to avoid damage the stems and branches of retained trees.
- Should additional tree removal or tree works be required the Local Authority Tree Officer shall be contacted and the scope of works agreed in writing.

D.7 Hazardous Materials

The delivery, storage, mixing and discharge of hazardous materials shall be carried out so that there is no run-off and spillage near the RPAs of retained trees. No substances that are potentially injurious to plant tissue (including diesel, bitumen, concrete, mortar, salts, builders' sand, herbicides and other phyto-toxic materials) shall be stored, discharged, prepared or used, where direct contact, infiltration or run-off might reasonably be considered liable to harmfully affect existing root growth, other parts of retained trees or beneficial soil organisms.

Hazardous chemicals are to be stored in suitable containers as specified by the Control of Substances Hazardous to Health (COSHH) Regulations (2002) (Ref 4). It is now standard practice to have emergency spillage kits available to minimise the impacts of any accidental spillages to the local environment. All cement mixing, vehicle washing or any other activity where toxic chemicals are used shall have the provision to contain any accidental spillage. This can be achieved by creating a bunded area using concrete slabs, timber framework or sandbags. Heavy duty plastic sheeting should be used to line the area as necessary to prevent leaking. Alternatively, all activities should take place on suitable spill trays or on an existing impermeable surface with runoff controls and at least 10m from the edge of the RPA of retained trees.



Making Sustainability Happen

Quod

Planning, Design and Access Statement

Manor Farm Cables - Laleham Substation Corridor

SEPTEMBER 2025

Q240951

Contents

1 Introduction

1.1 This Planning, Design and Access Statement ("this Statement") has been prepared by Quod on behalf of Juniper Energy Limited (hereafter referred to as "Juniper" and/or "the Applicant") in support of a planning application for grid connect cables ("Proposed Development") on land between National Grid Substation in Laleham, Spelthorne and proposed data centre and Battery Energy Storage System ("BESS") at Manor Farm, Slough ("the Site").

1.2 The planning application seeks permission for the following:

"Installation of underground and ground mounted structures to support electrical connection and communication cables with temporary construction compounds, and associated infrastructure and works."

1.3 The cable corridor passes through three different administrative boundaries of Spelthorne Borough Council ("SpBC"), London Borough of Hillingdon ("LBH") and Slough Borough Council ("SBC"). As a result, identical applications are submitted to all three Local Planning Authorities ("LPAs").

1.4 A full planning application ref. P/10076/013 was submitted to SBC in December 2024 for a data centre and BESS ("the Facility") on land known as Manor Farm, off Poyle Road to the east of Slough. An appeal has been lodged under Section 78(2) of the Town and Country Planning Act (1990)("TCPA") against the non-determination of the application (appeal ref. APP/J0350/W/25/3366043). The Facility is to be powered from existing substations at Iver and Laleham, which requires the creation of two electrical cable corridors to connect each substation with the Facility.

1.5 This application seeks permission for the cable corridor to the Laleham Substation ("the Laleham Substation Corridor"), and a separate planning application will shortly be submitted for the route to Iver Substation ("the Iver Substation Corridor").

1.6 Such cabling can be installed by utility providers without the need for planning permission under Part 15 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). In this case planning permission is being sought as the Applicant, a joint venture between Tritax Power Box Limited and EDF Power Solutions UK & Ireland, does not benefit from the same permitted development rights. However, the proposed development is of a form which would often be considered permitted development.

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

1.8 This Statement reviews the planning application proposals in light of the Development Plan (as applicable to the relevant local planning authority), having regard to relevant material considerations, including national planning policy and guidance. This planning application is accompanied by an Environmental Impact Assessment ("EIA") Screening Appraisal which explains the Applicant's view that the Proposal is not EIA development.

1.9 In addition, the planning application is supported by the following documentation:

Document	Author
Planning Drawings	JSM
Arboricultural Impact Assessment	SLR Consulting
Preliminary Ecological Appraisal Report	SLR Consulting
Ecological Impact Assessment	SLR Consulting
Shadow Habitat Regulations Assessment	SLR Consulting
Historic Environment Desk Based Assessment	SLR Consulting
Flood Risk and Surface Water Drainage Report	SLR Consulting
EIA Screening Appraisal	SLR Consulting
Preliminary Land Quality Desk Study	SLR Consulting
Biodiversity Net Gain (BNG) Assessment	SLR Consulting
Construction Traffic Management Plan (CTMP)	Pell Frischmann

1.10 This Statement is set out as follows:

- **Section 2 – Factual Background** confirms the relevant context of the Proposed Development, including a description of the Site.
- **Section 3 – Proposed Development** describes the application proposals for which planning permission is sought.
- **Section 4 – Planning Policy and Guidance** summarises the Development Plan and relevant national policy and material considerations.
- **Section 5 – Planning Considerations** provides an assessment of the proposed development against the relevant policies of the Development Plan having regard to relevant material considerations (including supporting guidance where appropriate).
- **Section 6 - Conclusion** provides a summary of the planning balance and justification for granting planning permission of the application proposals.

2 Factual Background

Site and Surrounding Context

2.1 The Site of the Laleham Substation Corridor falls across SpBC, LBH and SBC and extends between the proposed data centre and BESS at Manor Farm located to the west of Poyle Road, Slough and Laleham Substation located to the south east of Staines-upon-Thames.

2.2 The Site is delineated in Planning Drawing 1 - Site Location (Figure 1 below).

Figure 1: Site Location Plan

2.3 The red line boundary forms a corridor for the Proposed Development. The cables will be located within this corridor, with the precise location to be determined by the Applicant and contractor in consultation with the relevant stakeholders.

2.4 The length of the proposed Laleham Substation Corridor is approximately 8.4km. A breakdown of the cable corridor distance by Council is shown in Table 1.

Local Planning Authority	Approximate Cable Corridor Length (Laleham Route)
Slough	circa. 1,000m
Hillingdon	circa. 500m
Spelthorne	circa. 6,500m

Table 1: Approximate Length of Cable Corridor in each LPA

2.5 The cable corridor, as set out in the Planning drawing Pack, takes the following route from the Facility to the Laleham Substation, as set out in Table 2.

Local Planning Authority	Connection from the Facility to Laleham Substation
Slough	The route exits the site of the Facility to the east onto Poyle Road, travelling south to Horton Road to the administrative boundary with SpBC at the crossing of the Wraysbury River.
Spelthorne	Horton Road briefly steps into Spelthorne, before moving into Hillingdon Junction 14 of the M25.
Hillingdon	A short linear length of approximately 380m which crosses the Junction 14 roundabout above the M25.
Spelthorne	From Junction 14 of the M25 the route moves along Horton Road south, crossing the River Colne, through the Stanwell Moor and connecting with the A3044 Stanwell Moor Road. The route continues south along Stanwell Moor Road, passing between the King George VI and Staines Reservoirs and into Stanwell New Road. The route then crosses the A30 London Road and then continues south east along the A308 Staines Bypass, crossing the Fordbridge Roundabout and routing south across the Staines Reservoirs Aqueduct into the National Grid Substation.

Table 2: Laleham Cable Corridor Route

2.6 The Laleham Substation Corridor route is located predominantly within adopted Highway land save for a small number of locations where bespoke construction techniques are utilised.

Background and Wider Context

2.7 This planning application for proposed electrical and communications cabling is submitted in order to facilitate the delivery of a proposed data centre and BESS facility. An application for full planning permission for the Facility was submitted to Slough Borough Council on 13 December 2024 with the following description of development:

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

2.8 The application is subject to an appeal under Section 78(2) of the TCPA 1990 with appeal ref no. APP/J0350/W/25/3366043. It was confirmed on 29 August 2025, that the Secretary of State for Ministry of Housing, Communities and Local Government has recovered the appeal.

2.9 There is a compelling and urgent need for the Facility, and this application provides the supporting infrastructure to facilitate its delivery. Both local and national policy place significant weight on the need to support economic growth and productivity for development opportunities. It fully aligns with the Government's drive to support economic growth, as well as the specific proactive steps it has taken to facilitate the delivery of data centres.

2.10 Data centres are central to the Government's economic and digitisation strategy, as expressed latest Industrial Strategy which support swift decision making for essential projects such as data centres.

2.11 The Government announced an AI Opportunities Action Plan (January 2025) which seeks to position the UK as a global leader in AI innovation. Data centres are recognised as being central to this strategy, describing them as "the engines of the AI age".

2.12 The importance of data centres was specifically recognised by the Government when it designated them as 'Critical National Infrastructure' in September 2024, a term used to identify national assets that are essential for the functioning of society, such as those associated with energy supply, water supply, transportation, health and telecommunications. In the associated press release, the Government noted that the move showed "the fundamental importance of data centres for the government".

2.13 Furthermore, the Centre for the Protection of National Infrastructure is the Government authority for protective security advice to UK national infrastructure. In their report 'Protection of Data-Centres' they set out that:

"As the UK's economy becomes increasingly dependent upon information for delivery of online services and governance of major organisations, commercial Data Centres are recognised as forming part of the Critical National Infrastructure (CNI) – those assets deemed essential to the overall running of the country."

2.14 The National Planning Policy Framework ("NPPF") (February 2025) paragraph 85 has been updated to reference that planning decisions should make provision for: "*a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections).*" This denotes the importance national policy is placing on the need for data centres and their role in contributing towards the economy.

2.15 Consistent with national policy, the need for data centres is also reflected in numerous recent appeal decisions, specifically in the Slough Availability Zone. In the recent Woodlands Park decision (PINS ref no. 3347353) the secretary of state decision states:

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

2.16 The other element of the Facility is the BESS. BESSs are used to store energy at times where supply exceeds demand and release it back into the national grid as and when required. Battery storage is widely considered vital infrastructure to support the production of renewable energy and for energy security. It is also especially important in providing resilience to the local power network which is highly constrained.

2.17 In 2022, the UK Government published British Energy Security Strategy, which sets out ambitions to reduce the UK's dependence on imported fuels by investing in renewables and supporting infrastructure to deliver a "radical long-term shift" towards energy independence and net zero. BESSs are critical infrastructure to support the shift to renewable energy, by storing energy at times of high levels of production and returning it back into the national grid when demand increases. The Government has said the decarbonised power system would need to be underpinned by technologies that can respond to fluctuations in supply and demand, which includes energy storage.

2.18 A key component of the Energy Security Plan is to move away from fossil fuels to clean energy, which has the dual benefit of reducing emissions and tackling climate change, as well as securing greater energy independence.

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

2.20 The updated NPPF makes reference to national infrastructure growth ambitions by making it *"simpler and faster to build the clean energy sources needed to meet zero carbon energy generation by 2030".*

2.21 The National Policy Statement for Energy (2023) also highlights the importance of Energy Storage in achieving net zero and providing flexibility to the energy system, so that high volumes of low carbon power, heat and transport can be integrated.

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

2.23 Overall, there is a clear and compelling need for data centres and battery storage facilities and recent appeal decisions have demonstrated the role both play in facilitating economic growth, renewable energy production and achieving net zero targets.

2.24 The proposed cable corridor will provide the electrical connection to an existing substation to enable the Facility to operate.

3 Proposed Development

3.1 The proposed development is to install cables to connect National Grid transmission substation at Laleham to the proposed data centre and BESS Site at Manor Farm. The data centre/BESS site is located approx. 6.5km from Laleham substation, as the crow flies, with circa 8.4km of cable corridor connecting the two sites. The cabling will provide the power required for the data centre to operate and a connection to the national grid for the BESS.

3.2 The proposed grid connection will be for the majority underground and will involve the following:

- The excavation of a temporary trench to accommodate the cabling infrastructure consisting of up to two 132 kV dual circuits, together with associated communications cabling – unless:
  - A trenchless solution is proposed, e.g. under the M25 J14 or under a watercourse; or
  - Open cut watercourse.
- In limited sections the cable may be located in an above ground structure (e.g. connected to a bridge structure over a railway).
- Each 132kV circuit will consist of one strand per phase, with each strand located in a separate duct (for reference this means 8 ducts incl. communications).
- The construction trench will be approximately 1.0m wide and a depth of up to 3m, however it will typically be 1.0m deep.
- The construction trench will be infilled once the required cabling components have been laid; and
- At 500m intervals along the grid connection route, it is necessary to install a joint pit where lengths of the cable can be joined together. Each joint pit would be below ground level and would measure c.500mm x 300mm. A minimum of 17 joint pits will be provided along the route.

3.3 The route between the substation and the Facility is predominantly urban in nature, thereby limiting the potential available route options. As a result, a significant length of this route is provided along public highway.

3.4 The majority of the route is located within the highway where a temporary open cut trench will be created.

3.5 The trench will feature the cables contained within ducts. The ducts will be embedded in cabling sand. The trench would then be backfilled with excavated material. Surplus material would be taken to the nearest suitable commercial landfill facility.

3.6 Where the trench is in the surfaced area of a public road, the trench edges would be cut with a circular saw and the material excavated. The running surface of the road would be reconstructed to Highways standards. Where the trench is constructed in the verge or grassed

areas, the trench area would be reseeded with grass where the covering with existing turf could not be re-used.

3.7 The Applicant commits to no tree loss along the cable route corridor.

3.8 Figure 2 below provides an indicative cross-section of the cable corridor trench.

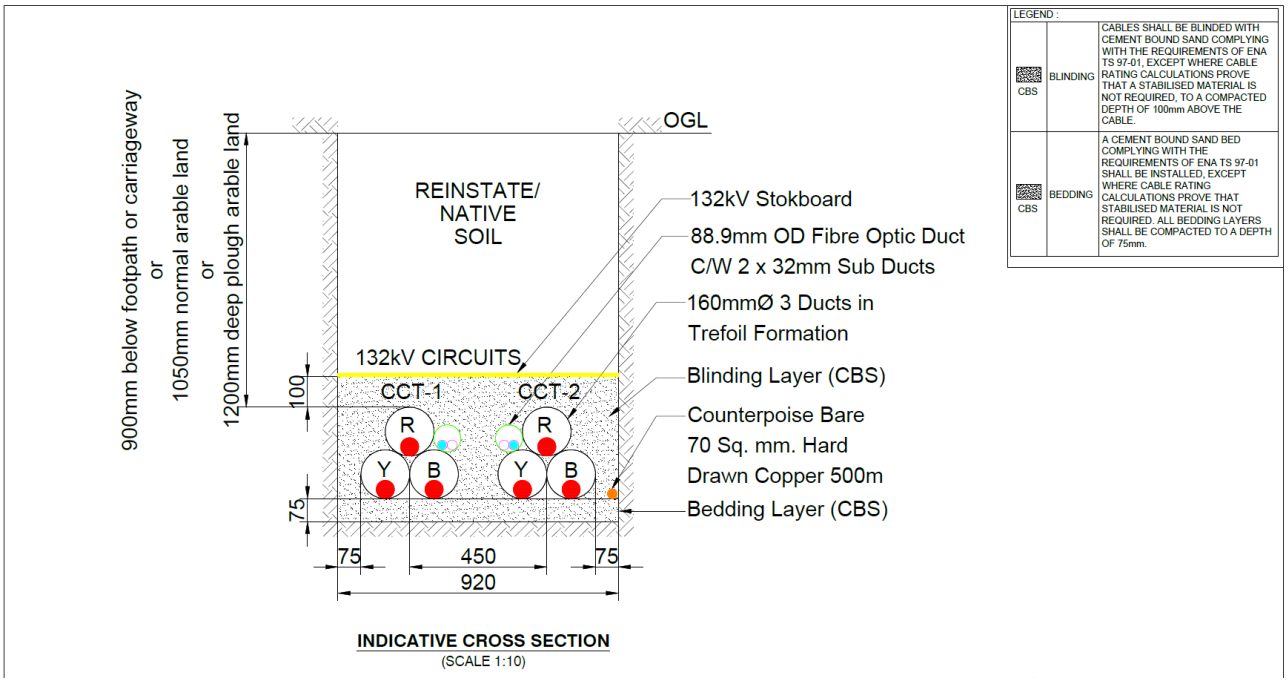


Figure 2: Indicative trench cross section along Laleham cable route

3.9 The precise location of the cable route is yet to be defined within the red line boundary corridor. The redline therefore provide some flexibility for the final cable route location. The flexibility in the placement of the corridor allows for unforeseen obstructions and other construction difficulties, for example, where existing unrecorded underground infrastructure (cabling, pipework etc.) exists.

3.10 At certain locations on the route, a bespoke construction solution is required, for example across a watercourse or railway. In these cases, one of four solutions will be employed:

- Open cut trench within the watercourse;
- Open cut trench within a highway structure (e.g. bridge);
- Ground mounted structure (e.g. cables fixed to the side of an existing bridge); and
- Trenchless solution such as Horizontal Directional Drilling ("HDD").

3.11 There are 17 instances where a bespoke solution is required which are identified as L-1 – L17 and are shown on plan ref. JSM-RL-EDF-24-0731_132Kv Cable Route_P06. Table 3 identifies the proposed construction solution(s) for each location. Where options still exist, a final decision will be taken during the detailed design process.

Location	Bespoke Construction Method
L-1	Watercourse Trenching
L-2	Trenchless
L-3	Trenchless
L-4	Trenchless
L-5	Trench in Highway
L-6	Trench in Highway
L-7	Trench in Highway
L-8	Trench in Highway
L-9	Trench in Highway
L-10	Trench in Highway
L-11	Trench in Highway or Ground Mounted Structure
L-12	Trench in Highway or Ground Mounted Structure
L-13	Trench in Highway
L-14	Trench in Highway
L-15	Ground Mounted Structure (or at grade between green space)
L-16	Trench in Highway or Trenchless Solution
L-17	Trenchless

Table 3: Bespoke Construction Methods

Construction Methodology and Phasing

3.12 The construction methodology employed for installation will be set out in a Construction Management Plan ("CMP") to be agreed with the various local planning and highway authorities under a pre-commencement condition discharge.

3.13 The cable route construction timeline will be created in conjunction with a Section 50 licence confirmed by the relevant Highways Authority. Detailed timings of the construction programme will also be created in conjunction with local businesses which may potentially be affected by the works.

3.14 In general, it is intended that the cable laying operation will be undertaken on a phased basis with an identified section being constructed and completed prior to moving on to a new section. Typically, a linear trench section of approximately 25 m will be excavated, with the cabling being laid and the trench being reinstated prior to progressing with further excavations works.

3.15 The precise length of cable being laid on a given day will be dependent upon the nature of the ground encountered and its complexity, having regard to issues such as the presence of existing infrastructure, trees, bespoke construction solutions, etc.

3.16 The decision as to the order in which route sections are constructed will be taken by the appointed contractor in consultation with the Highways Authority and having regard to any other identified constraints. This will be documented in the CMP.

3.17 For areas of verge and unmade ground, the excavation and reinstatement will be carried out using existing excavated materials where possible. If the original 'turf' is unable to be re-laid or is of a poor quality, then new topsoil and grass seed will be used. Digging will be undertaken using mechanical aids except where trees or other obstructions exist when sensitive installation techniques such as hand digging, vacuum excavation, etc. will be employed.

3.18 When installing cables within hard surfaced areas (such as roadway, footpaths or cycleways), these sections will be open cut using a floor saw and/or a mechanical pecker to break up the top surface. Mechanical means would then be used to remove the subsurface and associated materials to the correct depths. Once the cable is installed, the original surface would then be reinstated to the relevant specifications for the type of surface in agreement with the relevant Highways Authority.

3.19 Machinery and materials will be kept at temporary laydown areas, the location of which will be agreed as part of the CMP. Machinery may also be temporarily stored overnight at the location of the previous day's completed cable trench behind secure fencing.

4 Relevant Planning Policy

4.1 Cabling, such as that proposed in this planning application, can generally be installed by utility providers without the need for planning permission under Part 15 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended). In this case planning permission is being sought as the Applicant is not a utility provider and hence does not benefit from the same permitted development rights.

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

4.3 The Development Plan for each local planning authority across the cable corridor is as follows:

- **Slough Borough Council**
  - Slough Core Strategy Development Plan Document (December 2008)
  - Slough Site Allocations Development Plan Document
  - Slough Local Plan Saved Policies (2004)
- **London Borough of Hillingdon**
  - London Plan 2021
  - London Borough of Hillingdon Local Plan Part 1 Strategic Policies (2012)
  - London Borough of Hillingdon Local Plan Part 2 Development Management Policies (2020)
- **Spelthorne Borough Council**
  - Spelthorne Core Strategy and Policies Development Plan (2009)
  - Spelthorne Allocation DPD (2009)

4.4 A detailed review of the relevant policy maps has identified that the proposed cable corridors are subject to a series of designations as summarised in Table 4.

Local Planning Authority	Land Use Designations
Slough Borough Council	- Green Belt - Strategic Gap - Colne Valley Park - Area liable to Flooding
London Borough of Hillingdon	- Green Belt - Colne Valley Park - Air Quality Management Area - Site of Special Scientific Interest (SSSI)

	-
Spelthorne Borough Council	- Green Belt - Safeguarded Route for Airtrack - Site of Special Scientific Interest (SSSI) - Protected Urban Open Space - Public Safety Zone - Common Land - Flood Zone

Table 4: Policy Designations along the Laleham Substation Corridor in each LPA

4.5 A review of the relevant policies is set out below.

Slough Borough Council

Core Strategy DPD (December 2008)

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

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

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

4.9 Core Policy 10 (Infrastructure) requires development to be supported by sufficient existing, planned and committed infrastructure, including utilities.

Saved Policies of the Slough Local Plan (March 2004)

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

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

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

Resist urbanisation of existing areas of countryside;

Conserve the nature conservation resource of the park; and

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

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

4.13 Policy EN34 (Utility Infrastructure) requires development to ensure sufficient capacity exists or extra capacity of utility infrastructure is provided in time to serve the development.

London Borough of Hillingdon

London Plan 2021

4.14 Policy GG6 (Increasing Efficiency and Resilience) seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050 and requires an integrated and smart approach to the delivery of strategic and local infrastructure.

4.15 Policy SI6 (Digital Connectivity Infrastructure) supports the delivery of full-fibre or equivalent digital infrastructure.

4.16 Policy G2 (London's Green Belt) requires the Green Belt is protected from inappropriate development, in line with national planning policy tests.

4.17 Policy G7 (Trees and Woodlands) requires development proposals to ensure that, wherever possible, existing trees of value are retained.

London Borough of Hillingdon Local Plan Part 1 Strategic Policies (2012)

4.18 Policy EM1 (Climate Change Adaptation and Mitigation) encourages the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan.

4.19 Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national policies, including the very special circumstances test.

4.20 Policy EM6 (Flood Risk Management) requires new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF.

London Borough of Hillingdon Local Plan Part 2: Development Management Policies (2020)

4.21 Policy DMHB 14 (Trees and Landscaping) expects all development to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

4.22 Policy DMEI (Reducing Carbon Emissions) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

Spelthorne Borough Council

Spelthorne Core Strategy and Policies Development Plan (2009)

4.23 Policy EN8 seeks to protect and improve the landscape and biodiversity of the Borough.

4.24 Policy CO2 (Provision of Infrastructure for New Development) requires developers to provide or contribute in a timely way to the cost of infrastructure required as a result of any development they bring forward.

4.25 Policy CC1 (Renewable Energy, Energy Conservation and Sustainable Construction) supports the provision of renewable energy by encouraging appropriate freestanding renewable energy schemes.

Material Considerations

National Planning Policy Framework (2025)

4.26 The NPPF (February 2025) sets out the Government's planning policies for England and how these are expected to be applied.

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

4.28 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development. For decision-taking, this means approving development proposals that accord with an up-to-date development plan without delay. Paragraph 11 Part D states that where there are no relevant development plan policies, or they are out-of-date, permission should be granted unless there is a strong reason for refusal as set out in the NPPF or adverse impacts would significantly and demonstrably outweigh the benefits.

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

4.30 Paragraph 87 states that planning decisions should recognise and address specific locational requirements of different sectors. Sub-paragraph (a) adds that this includes making the provision for *"clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections)".*

4.31 Paragraph 116 with regards to the promotion of sustainable transport and highways impact, states that *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on*

the road network, following mitigation, would be severe, taking into account all reasonable future scenarios."

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

4.33 Paragraph 158 confirms that engineering operations which preserve the openness of the Green Belt and do not conflict with the purposes of the Green Belt, is not inappropriate development, as such very special circumstances do not need to be demonstrated.

4.34 Paragraph 170 confirms inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, where necessary, the development should be made safe for its lifetime without increasing flood risk elsewhere.

4.35 Paragraph 177 confirms that when it is not possible for development to be located in areas with a lower risk of flooding, the 'exception test' may have to be applied. Paragraph 178 sets out that in order to pass the 'exception test' the following should be demonstrated:

a) *the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*

b) *the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.*

4.36 Paragraph 215 states "*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".*

Planning Practice Guidance

4.37 The Planning Practice Guidance ("PPG") was originally published in 2014. The PPG adds further context to the NPPF and it is intended that the two documents are read together.

Slough New Local Plan

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

4.39 The latest stage in its preparation was the Regulation 18 consultation on the proposed spatial strategy, which took plan in November 2020 to January 2021. The timetable for the Local Plan is currently uncertain, with the latest LDS being out of date.

Emerging Local Plan 2024-2039

4.40 Spelthorne Borough Council is also working on a new emerging local plan for the period 2024-2039. The examination of the local plan was paused in 2023, and as of 2025, the examination of the local plan is ongoing. Consultation on the Inspector's Main Modifications took place in July 2025.

Summary

4.41 The cable corridor is located across three local planning authorities and various land use designations such as the Green Belt, Strategic Gap, and Colne Valley Regional Park where planning policy requires proposals for inappropriate development to demonstrate that any harms are outweighed by very special circumstances and that development has an essential requirement to be in that location. However, the proposed development is mainly underground electrical cabling predominantly within the public highway which is an engineering operation that will not impact Green Belt purposes and hence is not 'inappropriate development'.

4.42 National policy is highly supportive of data-driven digital infrastructure. In particular, data centres and associated grid connections have been specifically identified as critical national infrastructure and express support is given for zero carbon energy generation.

5 Planning Considerations

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

Principle of Development

5.2 NPPF Paragraph 87a states that planning decisions should recognise and address specific locational requirements of different sectors and makes provision for *"clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections)".*

5.3 The NPPF is also supportive of renewable and low carbon energy and associated infrastructure.

5.4 The proposed cable corridor works are required to support the critical infrastructure of a data centre and BESS. The proposed works are for the majority underground, located within the highway and following the installation works the land will be returned to its original state. The works are, therefore, by definition temporary in nature and thus the impact of the development on the surrounding area is also temporary.

5.5 It should be noted that cabling of this kind can generally be installed by utility providers without the need for planning permission under Part 15 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).

5.6 Therefore, the principle of development, which facilitates the delivery of critical national infrastructure via grid connections is supported by national policy.

Flood Risk

5.7 A comprehensive Flood Risk Assessment (FRA) has been undertaken in accordance with BS 8533:2017 and relevant national and local planning policies and guidance. All potential sources of flood risk to the site have been systematically assessed.

5.8 An initial screening identified potential flood risks from fluvial and tidal sources, surface water, groundwater, sewer and water main infrastructure, reservoirs, canals, and possible infrastructure failure. The assessment concluded that, following construction, the cable route would not be subject to significant flood risk.

5.9 It is confirmed that the proposed development falls within the 'Essential Infrastructure' classification and is necessary to support the operation of the associated data centre and BESS. These elements are consistent with wider strategic policy objectives for economic growth and the transition to a zero-carbon energy system, thereby delivering substantial sustainability benefits.

5.10 Post-installation, the flood risk to the cable is assessed as very low, in particular with the associated flood mitigation measures implemented during the construction phase, which will

ensure any temporary flood risks are appropriately managed. Accordingly, the development is considered to meet the requirements of the Exception Test.

5.11 Overall, it is anticipated that the temporary ground works associated with excavating the trench for the cabling, and the subsequent reinstatement of the topsoil/ground will not be at a high risk of any type of flooding and will not increase the risk of flooding to the surrounding area. No drainage measures are expected for these temporary works.

5.12 Therefore, the flood risk and hydrology impact of the proposed development is minimal and in line with local and national policy.

Ecology and Biodiversity Net Gain (BNG)

5.13 The proposed cabling route prioritises the use of existing highways where possible, which minimises the potential impacts on ecology, although works along the highway will generally be installed within grass verges and footpaths.

5.14 This Application is supported by a Preliminary Ecological Appraisal and Ecological Impact Assessment which determines that the proposed development area provides limited ecological value throughout the extent of the route. The proposed development will have negligible impact on the onsite habitats, habitats beyond the site and those protected species that may be using them. In certain locations along the Laleham Cable Corridor the proposed cabling is adjacent to designated habitats, although no proposed works will take place in these locations.

5.15 All grassland habitat along the cable corridor route that is to be excavated ensure the retention and replacement of turf following the construction of the trench, allowing for reinstatement of the habitat within a two-year period and preventing long term impacts. All habitats that cannot be reinstated within two years are to be avoided through micro-siting.

5.16 The majority of the watercourses will be crossed using trenches within the highway, trenchless techniques or ground mounted structures on overbridges. The only watercourse that may be directly impacted by open cut installation is the Wraysbury River. No otter or water vole evidence was found at the proposed crossing point.

5.17 Given the nature and location of works, overall ecological impacts are minor, and with the inclusion of embedded mitigation measures effects are either eliminated or reduced to levels that are not significant. Mitigation measures can be secured and delivered by a CMP and CEMP for the Proposed Development. All ecological surveys have been undertaken to support this planning application. The works will require Ecology Method Statements prior to the beginning of the works as part of the CEMP required as a pre-commencement planning condition.

5.18 The Biodiversity Net Gain Assessment calculates the baseline biodiversity value for the habitats within the red line boundary. It identifies that poor condition habitats comprise the majority of habitat units that could be impacted within the red line boundary subject to detailed design. This includes the 5 watercourse crossings, listed in Table 3, that are subject to bespoke construction methods other than trenching in the highway (albeit only one water course is likely to be directly impacted).

5.19 An appropriate Biodiversity Net Gain Scheme will be provided at detailed design stage which will outline that proposed development will meet the statutory BNG requirements by off-site biodiversity credits.

5.20 The baseline biodiversity figure includes various poor condition habitats which are suitable for reinstatement within a 2-year period, therefore minimising any long-term impacts of the cable construction. As such, the baseline biodiversity value for the proposed development is expected to be further reduced.

Arboricultural

5.21 An Arboricultural Impact Assessment has been prepared in support of this application.

5.22 All trees/groups and hedgerows within the red line boundary of the cable corridor are to be retained. The Applicant is committed to no tree loss, and the route selection is informed by the location of protected trees and avoids them where possible.

5.23 Works will seek to avoid root protection areas, but where necessary sensitive construction techniques will be explored e.g. hand digging.

5.24 Therefore, the proposed development has no determined impact on trees in line with local and national policy.

Transport

5.25 A Construction Transport Management Plan ("CTMP") has been prepared in support of the Laleham Cable Corridor Planning Application.

5.26 The installation of the cabling will have a temporary effect on highways for construction purposes and in some cases road closures and diversion.

5.27 An assessment, as set out in Section 5 of the CTMP, of peak daily construction traffic associated with the Proposed Development confirmed the scale of construction traffic is minor and is not expected to adversely affect the operation of the surrounding road network.

5.28 A range of mitigation measures and traffic management measures have been considered to manage and minimise any temporary impacts during the construction phase. To note this will be subject to the lead contractor appointment and in accordance with the relevant highways authorities. These include temporary lane closures, footway diversions, and traffic control measures. In sensitive areas, such as the Poyle Interchange, trenchless techniques (e.g. HDD or tunnelling) are proposed to minimise disruption to key transport routes.

5.29 The construction-related traffic impacts are temporary and transitory. With the proposed management measures in place, it is concluded that there are no transport or highways constraints that would preclude the construction of the Proposed Development, in line with local and national policy.

Archaeology and Built Heritage

5.30 An Historic Environment Desk Based Assessment ("DBA") has been prepared in support of the application submission.

5.31 The proposed route alignment has been established having regard to known areas of archaeological value. The cable corridor alignment has sought to avoid or minimise impact on any sensitive heritage locations, but any works will be temporary in nature and within the public highway.

5.32 No built heritage constraints have been identified in relation to the proposed cable route, and no further heritage assessment work is necessary.

5.33 The Historic Environment DBA assessment concludes that no archaeological assets of high significance are expected within the cable route corridor. While below-ground remains of negligible to local significance may be encountered, they are not considered to pose a constraint to the design or delivery of the development.

5.34 The proposal is consistent with the relevant heritage policies set out in the national and local policies, confirming no harm to known areas of archaeological value and built heritage.

Contaminated Land

5.35 A Preliminary Land Quality Desk Study is submitted in support the application proposals.

5.36 The cable corridor will be excavated to a typical depth of 1.0m, however up to a maximum of 3m in certain locations. The excavated soil will be placed on boards alongside the trench and then replaced within the trench once the cabling has been installed. Due to the low potential environmental impact to the receptors identified and limited scale of development, no significant precautionary measures are required.

5.37 Given the lack of any confirmed locations of contaminated land on the preferred route, it is proposed that a watching brief be undertaken for contaminated soils in specific locations identified by the local authorities. In these locations, should contaminated soils be found, then they will be disposed of in accordance with best practice and measures employed to ensure that no contamination run-off occurs. The excavated soils will be replaced by non-contaminated soils of known provenance.

Landscape and Visual

5.38 The installation of the cabling will have a minor temporary effect during the course of construction, and therefore the wider visual and landscape impact is temporary and thus negligible.

Summary

5.39 The proposed works are mainly underground, located within highway verges and following the land will be returned to its original state. Therefore, they are by definition temporary in nature and therefore, result in no impact to the site and surrounding area in terms of trees, ecology, flood risk, built heritage or transport. Therefore, confirming the development proposal is in accordance with the relevant Development Plan for each LPA and the NPPF.

5.40 The proposed cable corridor works are required to support the critical infrastructure of a data centre/BESS. Cabling of this nature is often installed by utility providers under Part 15 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended) without the need for permission as it is generally considered that the works will not result in unacceptable impacts.

6 Conclusions

6.1 This Planning, Design and Access Statement addresses the relevant planning considerations relating to the proposed Manor Farm Cables - Laleham Substation Corridor. This Statement is one of a number of supporting documents which together support the application proposals.

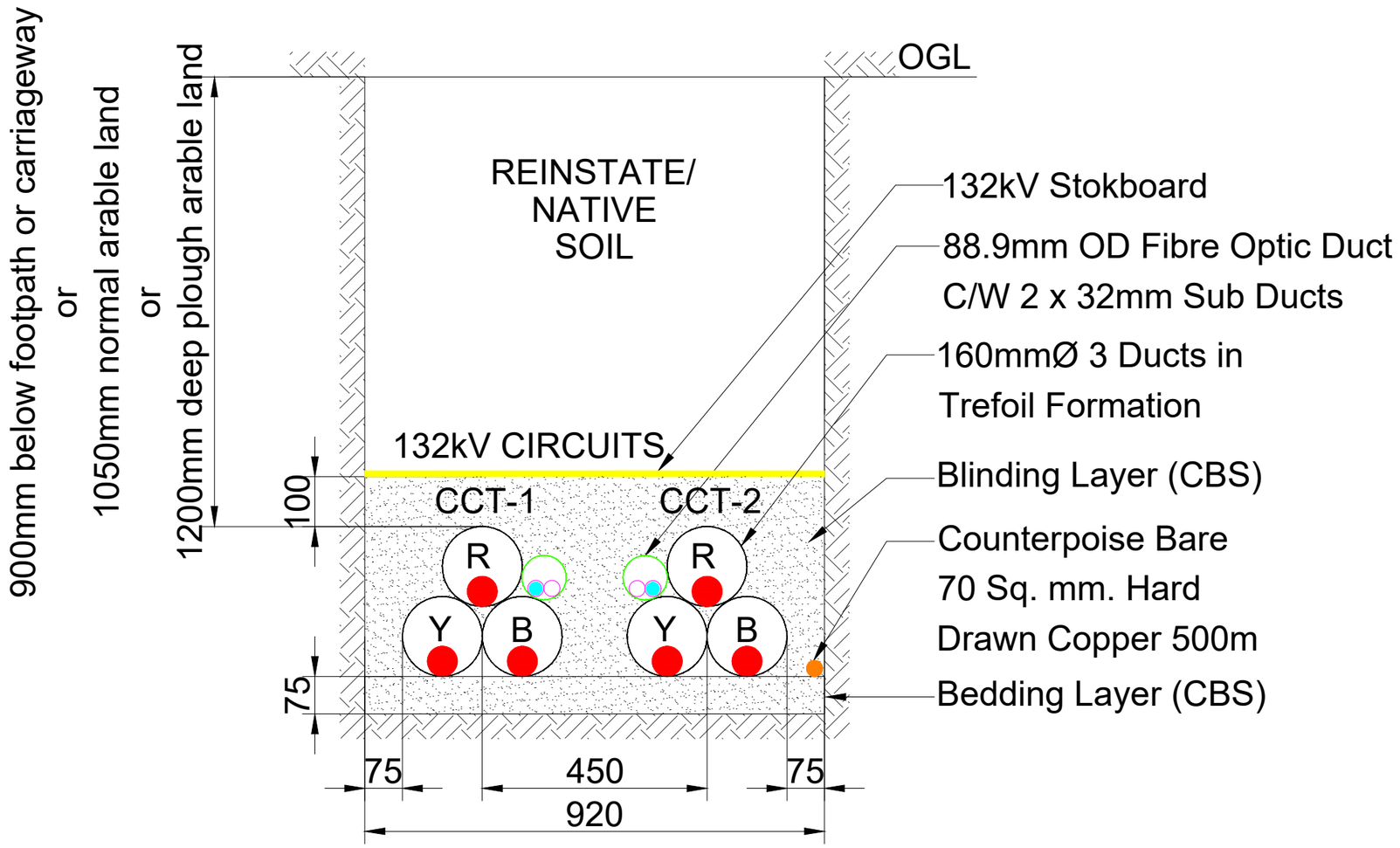
6.2 The proposed development seeks to install cables to connect National Grid transmission substation at Laleham to the proposed data centre and BESS Site at Manor Farm. The cabling will provide the contractually agreed power required for the data centre to operate and a connection to the national grid for the BESS. Both offering critical national infrastructure.

6.3 There is a compelling and urgent need for this application, which facilitates the Facility, and provides the supporting infrastructure for its delivery. Both local and national policy place significant weight on the need to support economic growth and productivity for development opportunities. It fully aligns with the Government's drive to support economic growth, as well as the specific proactive steps it has taken to facilitate the delivery of data centres.

6.4 This Statement confirms that the proposed works, which are mainly underground and located in adopted highways, will result in negligible to no harm on the surrounding area.

6.5 This Statement has demonstrated that the proposed development is in accordance with the Development Plan, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, having regard to material considerations which strongly support the grant of planning permission.

6.6 For the reasons set out in this Statement and the planning application documentation as a whole, planning permission should be granted for the development proposal.



INDICATIVE CROSS SECTION

(SCALE 1:10)

LEGEND :		
CBS	BLINDING	CABLES SHALL BE BLINDED WITH CEMENT BOUND SAND COMPLYING WITH THE REQUIREMENTS OF ENA TS 97-01, EXCEPT WHERE CABLE RATING CALCULATIONS PROVE THAT A STABILISED MATERIAL IS NOT REQUIRED, TO A COMPACTED DEPTH OF 100mm ABOVE THE CABLE.
CBS	BEDDING	A CEMENT BOUND SAND BED COMPLYING WITH THE REQUIREMENTS OF ENA TS 97-01 SHALL BE INSTALLED, EXCEPT WHERE CABLE RATING CALCULATIONS PROVE THAT STABILISED MATERIAL IS NOT REQUIRED. ALL BEDDING LAYERS SHALL BE COMPACTED TO A DEPTH OF 75mm.

NOT FOR CONSTRUCTION

Issue	Date	Purpose of Issue	Drawn	Checked
P02	21.08.25	FOR INFORMATION	SR	SS
P01	17.02.25	FOR INFORMATION	SR	SH

Client:

EDF Energy Renewable Limited

All traffic management will be provided in accordance with the Code of Practice for Safety at Street Works and Road Works, the “Red Book” (a copy of which will be available on site), issued under Sections 65 and 124 of the New Roads and Street Works Act 1991 and Chapter 8 of the Traffic Signs Manual.

Drawing Title:

EDFR 132kV Scheme
132kV Cable Route Cross Section

Drawn:	Date:	Checked:	Date:
SR	30.06.2025	SH	30.06.2025

Service Order Number:
-

Job Ref:	Scale:
P1308	1:10 @ A3

N

Drawing Number:	Page Number:	Issue
P1308-JSM-CS-EDF-25-0508	1 OF 1	P02

JSM Group
Sterling House,
Mutton Lane, Potters Bar,
Hertfordshire, EN6 3AR
T: 01992 788 019

11 September 2025

Note: Deliverability of Juniper BESS & Private Wire (to data centre) scheme

EDF power solutions UK & Ireland (EDFps) is working in partnership with Tritax PowerBox Limited to deliver the Juniper Energy Limited (Juniper) Battery Energy Storage System (BESS) and Private Wire offering which will provide critical power to a data centre using grid connections at Iver and Laleham.

EDFps has experience in developing both BESS and private wire schemes and looks forward to delivering this important project in West London.

In addition to engaging EDFps experience, Juniper has been working with experienced contractors including JSM Group and Mott MacDonald who have significant experience including working in urban environments and approach the project with the right network and the right skills to help deliver it.

These contractors have progressed feasibility design work to confirm that the scheme is deliverable, having assisted Juniper to assess various route alignment options. These investigations included around 50 trial holes along the route to confirm design assumptions, in addition to ground penetrating radar (GPR) surveys and holistic assessments of areas where bespoke construction solutions are required.

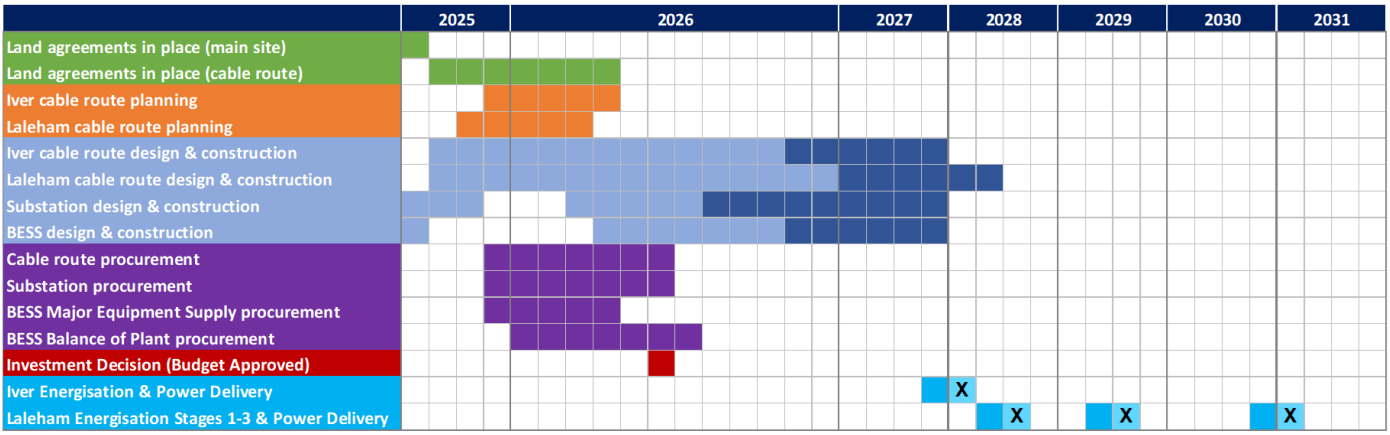
This has allowed Juniper to identify sections of the route which may require additional approvals, design lead-in times, or particular environmental consideration to confirm the best methods with which to build the route. These studies have progressed alongside environmental surveys which have informed the cable route planning applications.

The cable route needs to cross a series of physical features including watercourses, railway lines and motorways, all of which are common practice for EDFps. In respect of watercourse crossings, Juniper will employ an on-bridge structure or trenchless solutions where feasible to minimise the necessity of open-cutting a watercourse.

Alongside its contractors, Juniper has engaged with private landowners along the proposed cable route, as well as with third party asset owners such as National Highways, Network Rail, National Grid, etc. to ensure that appropriate design details are developed. Juniper is confident that the correct engagements have been undertaken thus far to support the energisation of the Iver grid connection according to its NESO contractually agreed date in October 2027 and Laleham energisation in May 2028.

Juniper and appointed contractors have worked closely to develop a delivery programme, which provides confidence that the scheme can be delivered to the grid connection dates. The work has demonstrated that Iver's cable route could be built over a ten-month period (mobilisation to construction estimate, depending on number of teams) and Laleham's cable route within eleven months (mobilisation to construction estimate, depending on number of teams). Juniper is working towards the dates noted below to deliver the scheme and ensure power supply to the Manor Farm site.

Consents for both the Iver and Laleham cable routes are being submitted to the relevant authorities in September and October 2025 to enable the delivery of the project according to the program below.



Overall, the feasibility work has affirmed that the route is constructable and that Juniper is on course to deliver it in a timely fashion.

EDFps has significant experience in developing, constructing, and operating energy infrastructure projects, with more than 50 operational assets across the UK and Ireland. EDFps specialises in navigating complex environments, including urban areas, where specific considerations must be addressed in design, stakeholder engagement, and construction. With this experience, EDFps, as part of the Juniper entity, approaches this scheme with confidence as the route is largely within public highway land and will work with its established suppliers to deliver the scheme in a safe and effective manner, within the programme identified.

Regards,

DocuSigned by:
Marianne Costigan
A6BE8EEC439948C...

Marianne Costigan
EDF power solutions UK & Ireland

Document 10 – HAL 2018 Consultation Extract

1.1 Figure 16.8, Our Emerging Plans, 2018

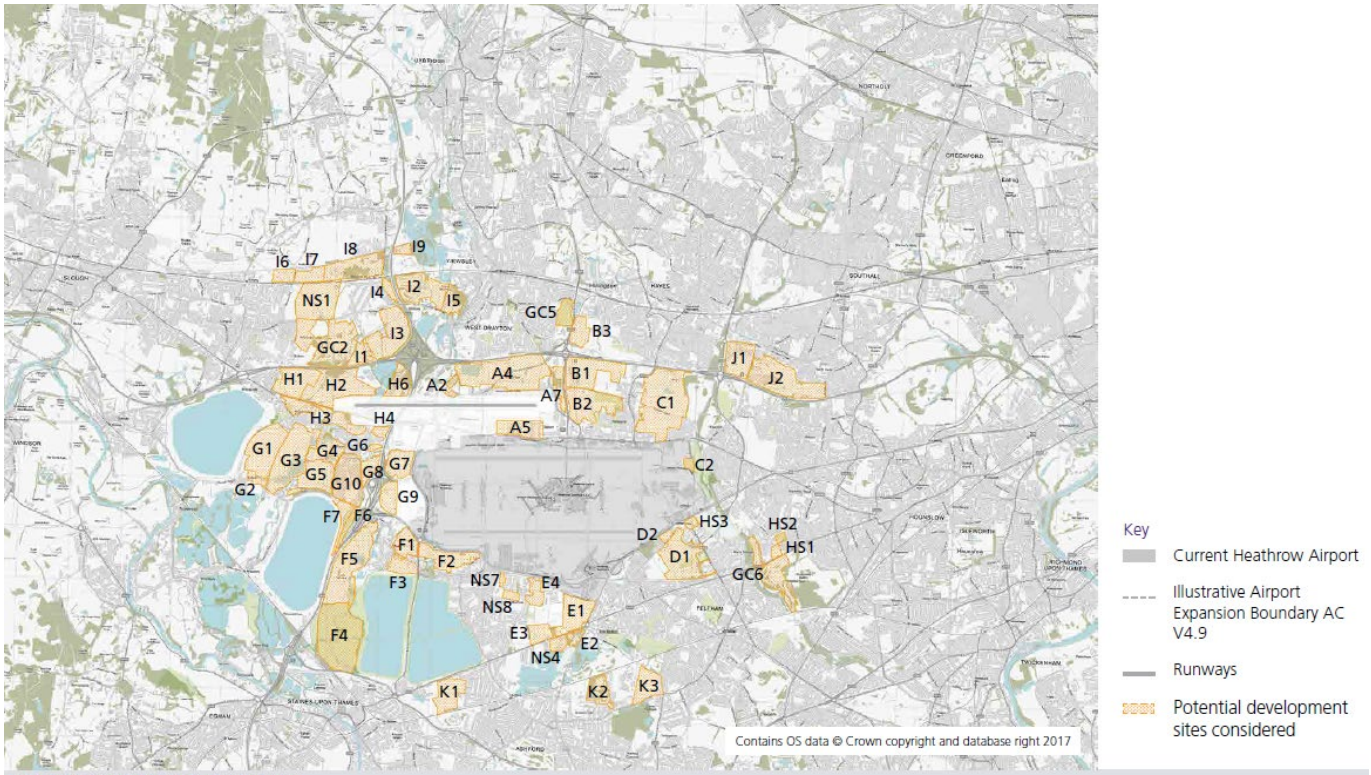


Figure 16.8: List of Sites Considered

1.2 Figure 16.9, Our Emerging Plans, 2018

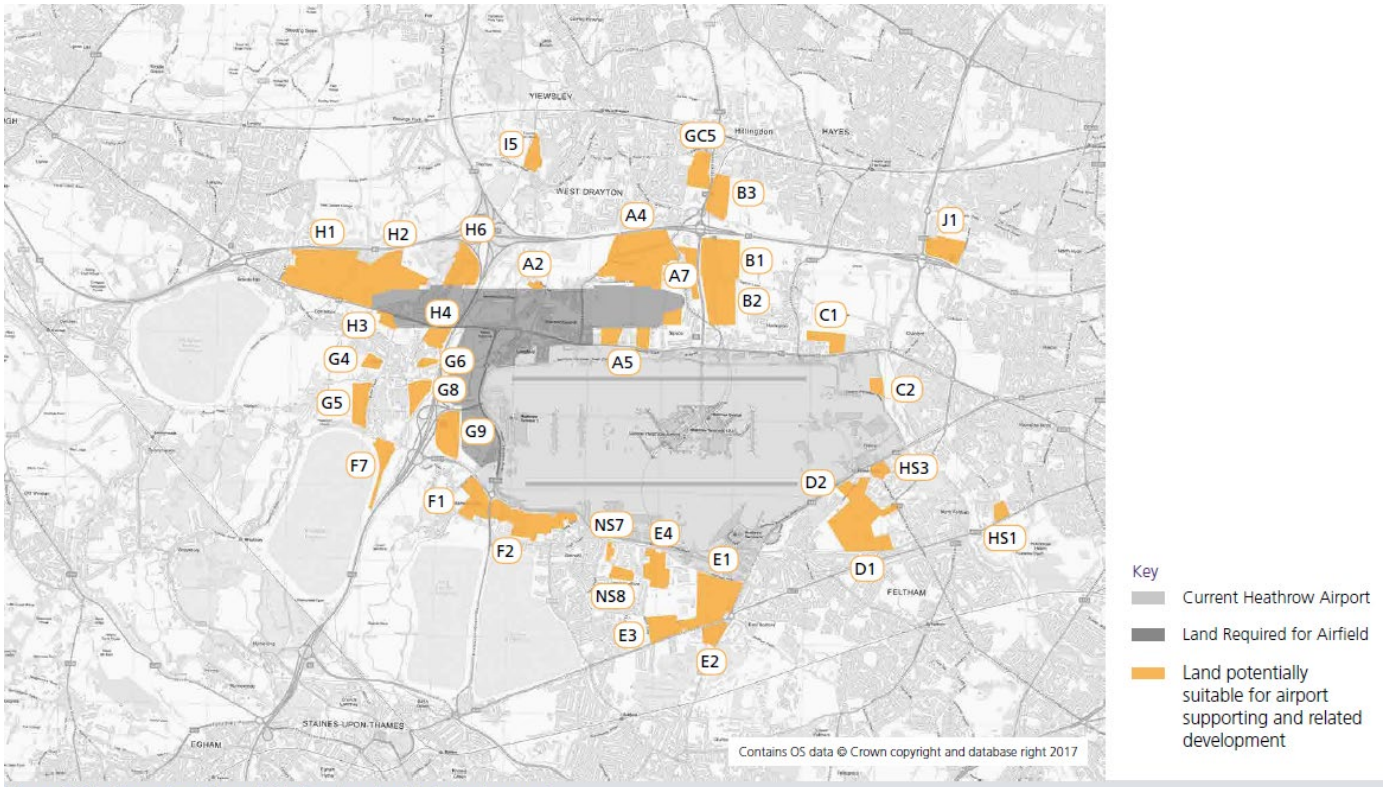


Figure 16.9: Sites potentially suitable for airport related development

SLR Consulting Limited

Manor Farm Propco Limited

Manor Farm, Poyle

SLR Project No.: 425.065619.00001

11 September 2025

Revision: V2

RE: BUS SERVICE SUMMARY

Introduction

1. The proposed development benefits from being served by a number of local bus routes which operate across the day and night. The existing bus service pattern in the area is reflective of the proximity to Heathrow Airport and the requirement for both airport passengers and staff to access the airport across the day and night. The service provision therefore complements the shift patterns of the proposed data centre operation. It provides regular connections from the surrounding settlements including Slough, Hounslow, Windsor and Bracknell.

Bus Service Summary

2. The nearest bus stops to the site are the northbound and southbound 'Colndale Road' bus stops along Poyle Road. These are located approximately 90m to the north of the site access. These bus stops benefit from a typical service pattern of one service per hour in each direction operated by route 5 and supplemented by some additional services by route 305.

3. There is a bus stop adjacent to the nearby Hilton which benefits from a half hourly bus service. This is the 'H5H' service, route 5 of the Heathrow Hotel Hopper. This service is operated by Hallmark Connections (part of Rotala Group) and provides a frequent connection to Heathrow Terminal 5 with a journey time of approximately 10 minutes.

4. Further to the north along Bath Road, approximately 700m from the site access, are the 'Poyle Road Junction' bus stops. The eastbound stop is also known as 'Colnbrook Holiday Inn T5 forecourt'. The walking time to the site is approximately 9 minutes. These bus stops benefit from up to five services every hour and provide links to local residential areas as well as to the nearest railway stations, which could form part of a multi-modal trip for future staff of the site.

5. **Table 1** sets out the current bus service provision by bus stop.

Table 1: Bus Service Summary

No.	Route	First Bus	Last Bus	Average Frequency (mins)			Operator
				M-F	S	S	
Colndale Road							
5	Heathrow - Slough - Cippenham	05:02	23:22	60	60	60	Thames Valley Buses
	Cippenham - Slough - Heathrow	03:36	22:47	60	60	60	
Hilton Hotel							
H5H	Heathrow Terminal 5 (loop)	04:30	00:00	30	30	30	Hallmark Connections
Poyle Road Junction							
81	Slough - Hounslow	05:09	00:32	12	12	15	Metroline Travel
	Hounslow - Slough	05:00	00:16	12	12	15	
703	Bracknell - Windsor, Slough - T5	00:15	23:16	30	30	30	Reading Buses
	T5 - Windsor, Slough - Bracknell	00:36	23:36	30	30	30	

6. It is likely that future employees of the site may work shift patterns. These shifts may include changeover times outside of the usual commuting peak hours, meaning staff may be arriving and departing at times such as 07:00, 14:00, 19:00 and later into the evening e.g. 22:00.

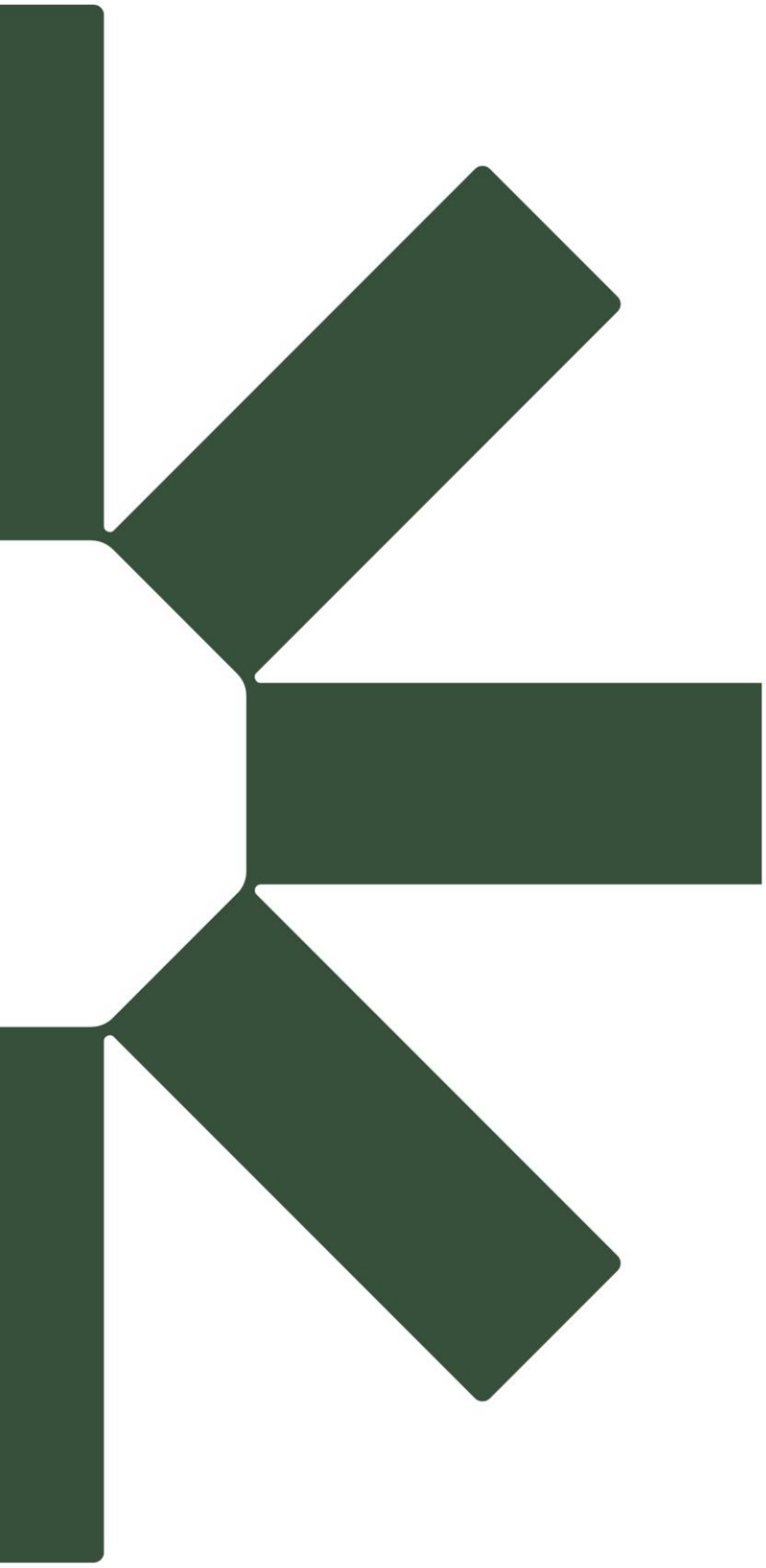
7. The bus services available from the local bus stops will support these types of shift patterns as the first service of the no.5 bus which stops along Poyle Road, i.e., at the 'Colndale Road' bus stop, arrives at 03:36 in a northbound direction and 05:02 in a southbound direction. Similarly, in the evening, the last departures are at 22:47 in a northbound direction and at 23:22 in a southbound direction.

8. From the Poyle Road Junction bus stop, the 81 service is similarly well placed to facilitate shift working in that the earliest arrival is at 05:00 and the latest departure is at 00:32. This service also runs every 12 minutes in each direction from Monday through to Saturday, and every 15 minutes on Sundays.

9. The 703 bus service which routes between Bracknell and Heathrow Airport Terminal 5 runs at an approximate hourly frequency through part of the night, before increasing to approximately half hourly from 03:16. The first service towards Terminal 5 commences at 00:15 while the first service of the day toward Bracknell commences at 00:36.

Summary

10. The local bus services are well designed for shift patterns associated with the proposed data centre to the west of Poyle Road. Staff are able to benefit from a number of services which run in the early morning and late evenings connecting the site to the local area in addition to the 703 service which operates 24 hours a day.



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Land at Manor Farm, Slough

Planning Ref: P/10076/013 PINS Ref: APP/J0350/W/25/3366043

16194_R06a_Response to Ecology and BNG Planning Review dated 4th August 2025

Purpose and Context

1.1. This note has been prepared by Tyler Grange Group Ltd ('TG') in relation to Manor Farm, Slough (hereafter referred to as the 'site'). It is in response to the Ecology and BNG Planning Review document (see **Appendix 1** – hereafter referred to as the 'Review') prepared in respect of the upcoming Public Inquiry in relation to an appeal under Section 78(2) of the Town and Country Planning Act 1990 due to non-determination by Slough Borough Council (SBC).

1.2. The Review was issued in response to the ecological documentation submitted with the planning application for the site (ref P/10076/013) and the appeal submission (APP/J0350/W/25/3366043). This includes the following relevant TG documentation:

- 16194_R03_GW - Ecological Impact Assessment dated 26th November 2024
- 16194_Biodiversity Net Gain Calculation dated 26th November 2024
- 16194_R04_CC – Shadow Habitat Regulations Assessment dated 2nd December 2024

1.3. In addition the Review references the Outline Construction Environmental Management Plan prepared by Ramboll and dated December 2024 (document ref: 1620016166-004_1_Manor Farm_OCEMP.

Summary of Points of Consideration Identified in the Review

2.1. The Review (see **Appendix 1**) confirms the following:

- The ecological survey data provided in TG documentation is considered valid and in date;
- Habitat and flora data is considered accurate and no further information is required;
- No further information is required in respect of bat activity and measures to ensure protection are confirmed as being possible to control via a condition including a lighting strategy and update surveys should the development plans change; and
- No further information is required in respect of assessment of breeding bird assemblage.

2.2. The Review identifies potential ecological constraints requiring further consideration as follows:

- Designated sites;
- Protected species (namely badgers, otter, bats and birds); and
- Biodiversity net gain.

2.3. These are considered in turn in Sections 3 - 5 below.

Designated Sites

3.1 The main statutory site of consideration is the Southwest London Waterbodies Special Protection Area (SPA) and Ramsar Site which is approximately 0.1 km away from the southern site boundary.

3.2 The impact of construction noise was not considered as part of the noise report carried out as it not possible, with any degree of accuracy, to determine noise levels before a contractor is appointed. Instead in such cases regard is had to the best practice guidance contained in 'BS 5228-1:2009 Code of Practice for noise and vibration control on construction and open sites'[1]. This standard refers to the need for the protection against noise and vibration and recommends basic methods of noise control relating to construction activities that may generate significant noise levels. It also recommends measures to mitigate the impact of noise including the following:

- Restriction on hours of operation.
- Site hoardings to provide acoustic barrier to construction works.
- Positioning of fixed plant away from receptors including recognised habitats.
- Maintaining plant in good working order.
- Hydraulic construction methods used in preference to percussion techniques.
- Use of localised screen around plant

3.3 These measures would be implemented through the Construction Environmental Management Plan (CEMP) which would control how construction activity would take place to mitigate environmental impact. These measures are standard practice and have not been altered to mitigate for impacts on the qualifying features of Southwest London Waterbodies SPA and Ramsar.

3.4 Whilst a detailed assessment cannot be carried out, an indicative assessment which considers the impact during the sub-structure and excavation stage (this being typically the noisiest phase of the construction programme) can be made. Noise source levels used in the assessment are based on the source references in BS5228. Work times are based on worse-case scenarios assuming excavators will be on 100% of the time during work hours and assuming impacts are directly adjacent to the ecological receptor. The predicted noise levels at the Southwest London Waterbodies SPA and Ramsar site are shown in **Table 3.1** below:

[1]The British Standards Institution (2014) Code of practice for noise and vibration control on construction and open sites – Part 1: Noise

Table 3.1: Predicted Noise Levels at the Southwest London Waterbodies SPA and Ramsar Site

Plant Type	Tracked Excavator	Excavator	Breaker	FLT's	Hand Tools	Skip Trucks
LAeq at 10m	72	79	80	76	80	77
BS 5228 Source ref	Table C, 2-3	Table C.2-24	Table C, 1.4	Table C 4.48	Table C4 Ref 93	SR Library
Distance (m)	100	100	100	100	100	100
Ground Hard/Soft	s	s	s	s	s	s
Distance adjustment	-23	-23	-23	-23	-23	-23
Screening	0	0	0	0	0	0
Resultant LAeq	49	56	57	53	57	54
Daily working hours	10	10	10	10	10	100
% on-time	100	100	50	50	50	10
Correction to LAeq	0	0	-3	-3	-3	0
Activity LAeq	49	56	54	50	54	54
Overall LAeq10hr	61					

3.5 As advised in the Shadow Habitat Regulations Assessment there is no specific noise criteria for the assessment of impact of noise on wildlife habitats, however noise levels of 70dBA are widely used as a suitable threshold to indicate a level of effect where disturbance due to noise may cause a behavioural response on waterfowl[2]. As shown above predicted indicative noise levels from construction activity at the site (61dB) will be 9dB below this threshold. Noise levels from construction activity would also be below the existing ambient (LAeq) noise levels measured, which as reported in the noise assessment at a location close to the Southwest London Waterbodies SPA and Ramsar are in the region of 66 dB.

3.6 Noise is a localised impact and developments will only result in a cumulative impact if they are in a similar proximity and occurring at the same time to result in an effect to any receptors. Based on a review of proposed or granted planning applications adjacent to the Site and ecological receptors no applications of a similar scale to the site are proposed to be undertaken at the same time as the Proposed Development. Furthermore, even if such

[2] Institute of Estuarine & Coastal Studies (IECS) University of Hull (2013) *Waterbird Disturbance Mitigaton Toolkit Informing Estuarine Planning &Construction Projects* Version 3.2

receptors were to occur the noise levels would only increase by approximately 3db which is still below the threshold of 70dBA in combination with the site. Therefore, no cumulative impacts are anticipated as a result of the proposed development on the qualifying features of South West London Waterbodies SPA and Ramsar and no Likely Significant Effect is anticipated.

Protected Species

4.1 Precautionary measures during the construction phase for nesting birds and foraging and commuting bats as well as pre-commencement checks for otter and badgers can be controlled and implemented through refinement of the Outline Construction and Environmental Management Plan prepared by Ramboll, to produce a specific CEMP for biodiversity. This can be secured by condition and would specify the nature and timing of pre-commencement surveys and how construction activity will take place to mitigate any impacts to protected and notable species which may be present on site in line with the requirements set out in the EcIA and the Review. These measures will be of standard practice and results would be submitted to SBC prior to commencement of works.

4.2 Where pre-commencement checks indicate a change in status of a protected species or, for example, presence of new badger setts or otter holts, the CEMP would specify the need for appropriate mitigation strategies to be agreed with SBC (and where appropriate Natural England licences be in place) prior to commencement of works.

Biodiversity Net Gain

5.1 The site delivers over and above the 10% gain requirements of the Environment Act and local and national policy for Biodiversity Net Gain in habitat and hedgerow units, of which the development achieves a 115.53% gain (11.76 units) and 10.07% gain (0.23 units) respectively (see EcIA report).

5.2 As noted in the Review, the 20m section of ditch present on the site was mistakenly missed from the baseline BNG metric submitted with the application although it was surveyed as part of the UKHabs survey for the site and is shown on the updated **Habitat Features Plan 16194/P04a**. As set out in the revised metric (see 16194_Statutory BNG Metric V2_110925 which should be read in conjunction with this note), the ditch and the culvert present have now been factored into the baseline metric for watercourses. The ditch is in poor condition passing only four condition criteria (see **Table 5.1**). Habitat and hedgerow elements of the metric are unaffected.

Table 5.1: Condition Assessment of Dry Ditch on Site

Condition Assessment Criteria		**Criterion passed (Yes or No)**
A	The ditch is of good water quality, with clear water (low turbidity) indicating no obvious signs of pollution.	**No**
B	A range of emergent, submerged and floating-leaved plants are present. As a guide >10 species of	**No**

	emergent, floating or submerged plants present in a 20 m ditch length.	
C	There is less than 10% cover of filamentous algae and or duckweed Lemna spp. (these are signs of eutrophication).	**Yes**
D	A fringe of aquatic marginal vegetation is present along more than 75% of the ditch.	**No**
E	Physical damage is evident along less than 5% of the ditch, with examples of damage including: excessive poaching, damage from machinery use or storage, or any other damaging management activities.	**Yes**
F	Sufficient water levels are maintained - as a guide a minimum summer depth of approximately 50 cm in minor ditches and 1 m in main drains.	**No**
G	Less than 10% of the ditch is heavily shaded.	**Yes**
H	There is an absence of non-native plant and animal species1.	**Yes**
Number of Criteria Passed		**4**
Condition Assessment Result (out of 8 criteria)	**Condition Assessment Score**	**Score Achieved ×/✓**
Passes 8 criteria	Good (3)	×
Passes 6 or 7 criteria	Moderate (2)	×
Passes 5 or fewer criteria	Poor (1)	✓

5.3 No loss of watercourse units is anticipated and the ditch would be retained which would give a net change of 0 units. In order to achieve net gain of 10% in watercourse units this would require delivery of just 0.01 watercourse units (considered insignificant in comparison to the 11.76 habitat units already demonstrated to deliver 115+% in habitats). As such, even in the absence of watercourse net gains the site will still deliver a significant net gain for biodiversity.

5.4 Nevertheless, enhancements of the retained 20m of ditch can be delivered via the Habitat Management and Monitoring Plan (HMMP), which is required and will be controlled via a planning condition – as set out in Section 6 of the EcIA. Measures in the HMMP to target enhancement of the ditch would be in the form of over deepening of the channel to achieve a water depth of 0.5m, natural colonisation of aquatic flora and relaxed management in order to target meeting of conditions A, D and F (see **Table 5.1)**. Management measures

would be applied to the full 20m section of ditch however to achieve a 10.6% net gain, only 3m of the ditch would need to reach 'moderate condition' (an additional 2 or 3 condition criteria). Alternatively 6m of the ditch would need to reach 'fairly poor' condition (fairly poor is undefined in condition assessment methodology but is likely to be an additional 1 or 2 criteria). This would be assessed and refined through the monitoring element of the HMMP.

5.5 For the purpose of this note, the revised Statutory BNG metric is based on the assumption that 3m of ditch would reach moderate condition (see Final Results snip below). However it should be noted that this is likely to be the minimum attainment and if enhancement of the whole 20m section of ditch achieves a 'fairly poor' condition along the length, it would deliver 38% net gain in watercourse units and a 'moderate' condition along the full length would deliver a 70% net gain in watercourse units.

5.6 On balance, therefore it can be concluded that the site can deliver significant net gains for biodiversity and has the ability to deliver over and above the statutory requirement for habitat, hedgerow and watercourse units. Measures to control such net gains would be delivered as part of the HMMP to be controlled via a planning condition.

BNG Final Results Assuming 3m of ditch reaches moderate condition:

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	11.76
	Hedgerow units	0.23
	Watercourse units	0.01
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	*Habitat units*	115.53%
	Hedgerow units	10.07%
	Watercourse units	10.60%
Trading rules satisfied?	Yes ✓	

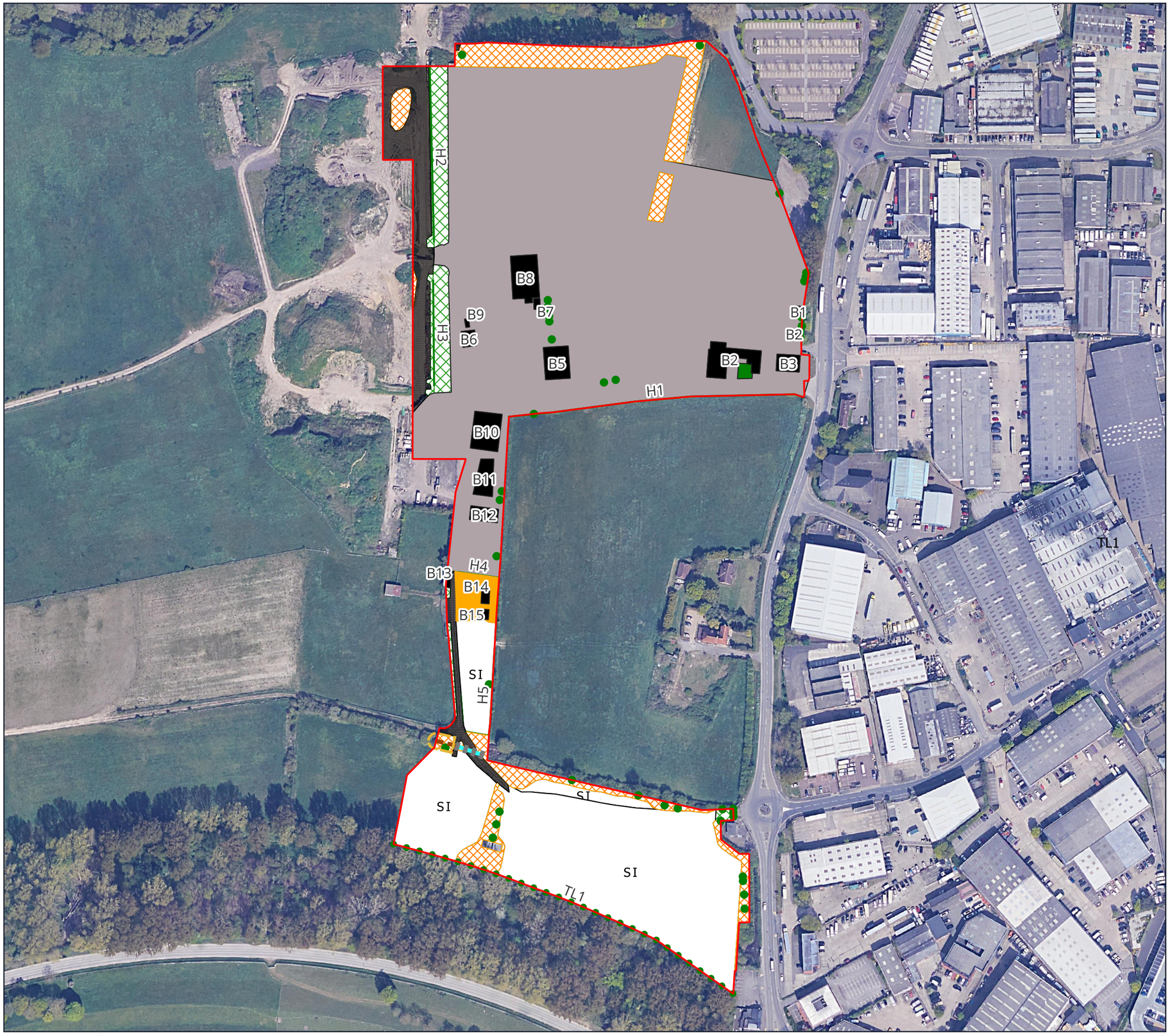
Conclusions

5.7 This note confirms that SBC and the Planning Inspector can conclude as competent authority, there would be no likely significant effect as a result of noise arising from the proposed development (alone or in combination with other projects) on the South West London Waterbodies Special Protection Area (SPA) and Ramsar.

5.8 In addition, measures to ensure protected species are safeguarded can be controlled via refinement of the Outline Construction Environment Management Plan to deliver a CEMP for biodiversity and ensure the required measures for protection of bats, birds, otter and badger are incorporated, including the need for pre-commencement checks.

5.9 Incorporation of measures to enhance the condition of the retained ditch into the HMMP, which is to be controlled by a condition, will ensure a minimum of 10% net gains for watercourse units.

Habitat Features Plan 16194/P04a



Legend

Habitat Features

- Hardstanding
- Buildings
- Bramble Scrub
- Bare ground
- Garden
- Mixed Scrub
- SI Modified Grassland
- Neutral Grassland
- Hedgerow
- Tree
- Treeline
- Culvert
- Dry ditch

N

0 50 100 m

Project	Manor Farm, Slough
Drawing Title	Habitat Features and Preliminary Bat Roost Assessment
Scale	As Shown (Approximate)
Drawing No.	16194/P04a
Date	September 2025
Checked	WW/GW

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Appendix 1: Ecology and BNG Planning Review