

TOWN AND COUNTRY PLANNING ACT 1990
PLANNING AND COMPULSORY PURCHASE ACT 2004

APPEAL BY MANOR FARM PROPCO LIMITED
MANOR FARM, POYLE

APP/J0350/W/25/3366043

Inquiry opened 14 October 2025

APPELLANT'S OPENING SUBMISSIONS

The development and the site

1. Manor Farm lies to the west of the Poyle Trading Estate ('PTE') and comprises 8.16 ha of land in two parcels, which we have tended to call A and B. Parcel A has an established industrial character, created by the presence of five large warehouses, extensive areas of hardstanding, external storage and parking; it has a generally unmaintained appearance.
2. Parcel B was previously used for minerals and subsequently landfilled, it is now agricultural in use and contains a small building. Between the two is a linking strip referred to in the evidence as the Link Road Parcel which is grassed in its southern half and has hardstanding and buildings on its northern half. .
3. The Appellant, is a wholly-owned subsidiary of Tritax Big Box Reit, the UK's largest logistics-focused Real Estate Investment Trust and a FTSE 250 listed company. It seeks full permission for a Data Centre (Use Class B8) and a Battery Storage System (or 'BESS') with ancillary development including new and amended junctions with Poyle Road. There are also off-site enhancements proposed in the form of a new pedestrian route along the Poyle Channel and Colne Brook, connecting the leisure and outdoor facilities at the Arthur Jacob Nature Reserve to the west with the Poyle Road.

Planning policies

4. The site lies in Slough Borough and the Council's prevailing adopted local plan documents are the saved policies of the 2004 Local Plan, and the Core Strategy of 2008 are of some age now and, as the evidence shows, written at a time well before the current national policies (here most importantly the December 2024 Framework) and before the extensive need for data centres arose.
5. The appeal site is not allocated and lies in the Green Belt, the Strategic Gap between Slough and west London and in the Colne Valley Regional Park.

The opportunity

6. In addition to its other geographies, the site lies in what is known as the Slough Availability Zone ('SAZ'), a name unfamiliar to those not connected to the provision of Data Centres ('DCs'), but a place the importance of which to the economy is hard to overstate. The SAZ is the area within which DC operators need to provide their services – heavily connected to sources of power and fibre and ensuring vital internal reinforcement of data supply through clustering. All parties to the appeal recognise the importance of the SAZ, which is the largest and most mature availability zone in Europe, second only to north Virginia globally. It already accommodates hyperscale operators with familiar names – Microsoft, Google, IBM and Oracle – but the need is far from met.
7. Driven by several societal factors, our need for DCs has been and remains exceptionally high. Between 2012 and 2024 the DC capacity in the SAZ increased by a factor of 10, markedly outstripping global averages and underlining the area's crucial significance to UK plc and indeed internationally.
8. There is no real need to re-invent the wheel where this need is concerned. Recent planning decisions have recognised it – the Secretary of State has recently acknowledged the need within the SAZ: at Court Lane, Iver (2024) some 1,730 MW were identified as required by 2027 (for scale, that equates to between 12-15 new hyperscale sized DCs); at the Woodlands Park, Iver,

decision in 2025, a mid-range need of 2,486 MW was identified between 2024 and 2029 – the need is truly colossal and escalating.

9. Mr Powney for the Appellant has revisited the assessment of need and finds, consistent with the tone of those earlier decisions, that in the SAZ the need is around 2,970 MW by 2030; his assessment lies towards the lower end of a range of assessments drawn from different sources and he even includes an unrealistically low ‘pessimistic’ scenario for comparison.
10. Bearing in mind the committed DC development which has yet to be built, the net need, or shortfall, in the SAZ is for some 1,259 MW. This net figure includes an allowance – almost certainly a significant overestimate – of 559 MW of DC capacity at the Slough Trading Estate (‘STE’) delivered in the next 5 years (a more ambitious assumption than Segro itself makes).
11. In common with other recent planning exercises involving SAZ DCs, an examination of alternative sites has been carried out. Mr Cole has taken a robust and flexible approach to the identification of the relevant area and to the method of site search. His evidence reviews and supersedes the exercise undertaken by Colliers for the planning application and assesses the sites raised by the Council. His conclusion is that there is no alternative site to meet the shortfall identified by Mr Powney.
12. It is important to remember in connection with the alternative sites exercise that the scale of unmet need does not just require one alternative site, but many. It is also of enormous importance that the DC proposed in this appeal scheme is one which can be delivered in the next couple of years, due to the unique power supply that Mr O’Reilly describes in his evidence. It is unique because it stands in contrast to a number of other recently consented DCs and because of the speed with which the site can be energised. The Appellant’s parent company has partnered with EDF to create a specific vehicle, Juniper, which will bring a supply of 107 MW to the site from two separate parts of the transmission system, Laleham and Iver (there will be three circuits in all, two from the former and one from the latter, all connected by private wire). Crucial to this supply is that it will be directly supplied by National Grid Electricity Transmission’s network, and benefit from high levels of supply security and can be first energised in Q4 2027.
13. That sets the site apart from any other in this crucial area to the west of London – the demands on the Grid are substantial and reinforcement work is underway, but it is not estimated to be available until well into the 2030s. So, the appeal scheme can be delivered, through an investment of over £365M, to meet some of the unmet need significantly ahead of the prevailing constraints.

14. All of this really matters because the Government views DCs as Critical National Infrastructure ('CNI'). They are essential to economic growth and their reach is across almost every aspect of commercial and private life. Their provision is expressly sought through the Framework (paragraph 87) and forms part of the general concerted drive to enable economic growth, a point emphasised by the June 2025 Industrial Strategy which treats DCs as key to the Government's economic strategy. Very substantial weight therefore attaches in planning terms to the way that this appeal scheme seeks to take the opportunity offered here.

Seen against planning constraints

15. The appeal site lies in the Green Belt in the Council's adopted plan; there has been no boundary review since the December 2024 Framework (and the February 2025 PPG) introduced the grey belt category of land. To some extent, that itself makes the development plan out of date.
16. Applying the PPG, the site is grey belt: it does not strongly contribute to purposes (a), (b) or (d) of the Green Belt set out in Framework paragraph 143. In particular, the evidence informs a judgement that purpose (d) is not engaged – which is agreed – and the development of the site would not result in incongruous development which would be uncontained on the edge of Poyle – its existing surrounding context provides significant containment. Furthermore, the site only plays at best a moderate role in retaining the separate identities of Slough and London.
17. There is no footnote 7 issue which would make the site anything other than grey belt. As I have said, the change in national policy and the need to assess grey belt according to the PPG strongly indicates that the Green Belt policy suite in the adopted plan is now out of date and conflict with it should be given much diminished weight.
18. The site also lies in the Strategic Gap – essentially an overlay policy seeking to bolster the same separation function which stems from purpose (b) of the Green Belt purposes in this location; but similarly, the question arises as to whether, against today's national policy and prevailing needs, the Strategic Gap policy is out of date. This is a grey belt location to which national policy now directs development, rather than a purely Green Belt location to which the previous policy, underlying both Green Belt and Strategic Gap policies, was addressed.
19. The development's sustainability and need credentials (and the fact that the appeal scheme is far too circumscribed to affect the totality of the Slough Green Belt) mean that the development

is not inappropriate in Green Belt terms; its impact on the Strategic Gap is commensurately limited. As the evidence of Messrs Powney, Cole and O'Reilly shows, it is essential to deliver this scheme in this location; that entails compliance with Core Policy 2 and Saved Policy CG9 relating to the gap.

20. Mr Webster also covers the relatively limited impacts on landscape character and visual amenity that the scheme would have, and through the inquiry it will become clear that the site is viewed by all parties as appropriate for development rather than necessary to keep free of built form. To the extent that it is necessary to consider it (ie, only if the view is taken contrary to the evidence that the site is not grey belt land), the effect on purpose (c) of Framework paragraph 143 would only be moderate.
21. Mr Webster also assesses the related but different effects on the Colne Valley Regional Park ('CVRP'): there would only be a minimal impact on the landscape of the CVRP, since development will be within largely developed areas and/or tight up to the road network and the PTE. There would be no significant visual impacts – best appreciated on site, but governed by the extent of surrounding (largely man-made) topography and vegetation. The CVRP is also a recreational area and the improvements I mentioned earlier would directly support its objectives, hence there would be a general accord with the relevant policy, CG1.

Other points

22. The scheme has been assessed as having a low level of harm to two Grade II assets at the nearby farm. It is agreed with the Council that any such harm would be outweighed by the public benefits of the scheme (SCG paragraph 7.32).
23. Heathrow Airport Limited ('HAL') as a third party to the appeal objects on the basis that it has its own mooted freight forwarding use for the site in association with the potential third runway proposals at the airport. The Appellant of course supports the idea of Heathrow expansion but it is quite a stretch to say that permission for the appeal scheme, a timely piece of much-needed CNI, should be prevented for reasons associated with a potential alternative use.
24. Questions can be explored to some extent about the status of the 3rd runway proposals, the role of the site in relation to the core expansion of the airport indicated in the Airport National Policy Statement ('ANPS'), and the set of regulatory steps and supporting analyses still to be undertaken for the 3rd runway proposals. The reality is that the appeal scheme is not in conflict

with the 3rd runway, and there is no binary choice between the DC proposed in this appeal and the provision of development associated with it – both can come forward without undermining each other.

Benefits of the appeal scheme

25. The benefit of meeting in short order some of the CNI need in the UK's most important availability zone is clear and carries substantial weight. Its direct and indirect effects on the growth of the national economy are set out in the evidence.
26. The BESS is also needed and accords with national policy. Mr O'Reilly explains how it will support local businesses and surrounding communities as well as contribute to the national (indeed global) drive to reduce greenhouse gas emissions and increase energy security (as sought in paragraph 168 of the Framework).
27. DCs are not just buildings full of servers. The development would bring up to 490 FTE jobs during the construction phase, and around 65 FTE jobs when operational, a high proportion of which would be skilled, with ancillary facilities management and security roles. These on site jobs will be accompanied by a Community Development and Skills Strategy to help the upskilling of workers in the Council's area.
28. The scheme would increase Gross Value Added ('GVA') by £5.98M a year, and bring £3.5M worth of business rates, some £1.5M of which would be retained locally.
29. Turning to environmental benefits, the scheme would deliver pedestrian and recreational improvements in the CVRP, provide biodiversity net gain ('BNG') compared to current state of the land in excess of the minimum policy and statutory requirements, lead to the reduction in vehicle trips from the site, and bring about some localised improvements in pedestrian and bus connectivity which will be of some wider benefit.

Conclusion

30. For all these reasons, the appeal scheme should be granted permission. Mr Murphy's judgement is that it accords with the development plan as a whole; the fact that the plan is out of date in

relation to Green Belt and meeting development needs in this area must also be borne in mind, as it has the effect of engaging the tilted balance in paragraph 11(d) of the Framework.

31. He also reaches the conclusion that even if the site is not judged to be grey belt, contrary to the evidence, then such is the need and the prevailing circumstances, that Very Special Circumstances exist, because the benefits of granting permission clearly outweigh the harms. This is an opportunity which ought to be taken, bearing in mind (a) the nature of DC as CNI – which through the collection of acronyms translates as something essential for the economic health of the country, a claim that can genuinely be made about a large DC in the SAZ, and (b) the relatively limited impacts the scheme would have.
32. It will therefore be submitted, subject to the evidence, s106 and conditions, that the scheme should be recommended for approval and that in due course the Secretary of State should grant permission for it to proceed.

RUPERT WARREN K.C.

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