Alternative Site Assessment

Former Sipson Garden Centre

Date of report: October 2026

savills

Sensitive

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1. Introduction

1.1 Preamble

1.1.1 This Alternative Sites Assessment (“ASA”) has been prepared by Savills on behalf of VIRTUS Data Centres (“the Applicant”) in relation to the Former Sipson Garden Centre (the "Application Site") to accompany a Planning Application for the development of the Site for an employment scheme comprising a planning application for a Data Centre (DC) scheme with associated works (the "Development"). The description of development is as follows:

> *Outline planning application (with all matters reserved except for access) for the redevelopment of the former Sipson Garden Centre site to provide a data centre facility, including associated energy infrastructure, security measures, landscaping, and access arrangements.*

1.1.2 A more detailed description of the development proposals is set out in both the Planning Statement and the Design and Access Statement accompanying the planning application.

1.1.3 The Application Site comprises 6.97 ha to the east of Sipson Road, and is located within the London Borough of Hillingdon (‘LBH), and constitutes Green Belt land, a significant proportion of which is previously developed. It is within the Hayes Availability Zone (‘HAZ’).

1.1.4 The Application Site is bounded on its eastern boundary by part of the M4 motorway running between Heathrow Airport to the south and the M4 motorway (running west to east) is located to the north. The western boundary is formed by the A408, from which access is secured. There are a small number of residential dwellings to the south west that also front the A408.

1.1.5 Located immediately to the north of the Application Site is the Holiday Inn Hotel. A locally listed pub, The Plough, is located at the Application Site’s north western boundary. Beyond the Application Site’s southern boundary are a number of residential dwellings forming part of the settlement of Sipson.

1.1.6 There are no national or local statutory designated Sites on or within 2km of the Application Site. There is one Internationally Designated Site within 10km of the site which is the South West London Waterbodies Special Protection Area and Ramsar, located approximately 4.7km to the southwest.

1.1.7 The Application Site is located entirely within Flood Zone 1, which has a very low probability of flooding. It is also not considered to be at risk of flooding due to Climate Change (2070 to 2125 as per the Environment Agency’s Flood Map for Planning.

1.1.8 Savills Planning have prepared other ASAs, including recently as part of a public inquiry giving evidence on alternative sites for a hyperscale data centre proposal in the Slough Availability Zone. The appeal was allowed in June 2026, and the demonstrable lack of alternative sites was given significant weight in favour of granting the permission by the Secretary of State.

1.2 The Purpose of the ASA

Green Belt and Very Special Circumstances

1.2.1 The prefatory text to Chapter 13 of the National Planning Policy Framework (NPPF) (August 2026) explains that the objective of Green Belt policy is to prevent urban sprawl by keeping land permanently open, and that the essential features of Green Belts are their openness and

permanence. The purpose of the ASA is to demonstrate that there are no alternative sites which can accommodate the proposed development.

1.2.2 Policy GB7 of the NPPF states that development is 'inappropriate' in the Green Belt unless a specified exception applies. Policy GB6 explains that 'inappropriate' development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances ("VSCs"). The NPPF does not offer a formal definition of VSC, and it is therefore the decision maker's responsibility to apply an appropriate planning balancing exercise. The NPPF explains that VSCs will not exist unless potential harm to Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

1.2.3 The VSCs for the Development are set out in the Applicant's Planning Statement. Whether there are any potential alternative sites that could accommodate the Development (in whole or in part) is material to the VSC case.

1.2.4 It is worth noting that decision makers are not required to consider alternatives sites under either legislation or policy. An ASA is not in itself a formal 'test' of the Development Plan and the availability or otherwise of alternative sites upon which a proposed development could be located is immaterial to the planning merits of that proposal. However, in a judgment handed down in April 2017[1], Holgate J stated that 'where the proposal would have substantial adverse effects which are said to be outweighed by the need for the development, then the availability of alternative sites upon which that need could be met with less harm may well be relevant.'

1.2.5 The context of the Development is different to the proposal that was the subject of the judgment noted above, in that it will not result in substantial adverse impacts – as set out in the Applicant's Planning Statement. However, in light of the Application Site being within the Green Belt, an ASA has been prepared to consider whether any appropriate alternative sites exist.

Sufficient Alternative Sites

1.2.6 In respect of the approach to an ASA, it has been well established that if the full identified need for development cannot be met by the sites established as being available and suitable, it follows that there is not a sufficient supply of alternative sites. This approach has been dealt with by the Court of Appeal.[2] Lindblom J stated in the decision handed down on 31 January 2017, that the remaining need as a whole can be a decisive consideration, and that in the event that 'alternative sites' are unable collectively to meet this need in full, then they do not represent an alternative. Relevant paragraphs are quoted below:

> *His [the Inspector's] conclusion that there was "a lack of housing land to meet the full [objectively assessed need]" was not limited to Crowborough; it was explicitly a conclusion on the basis of a "search for alternative sites taken wider than Crowborough." He was not satisfied that such other sites as were available for housing development in the district would be sufficient to meet the need, or that the shortfall would be made up by development elsewhere. This was a matter of planning judgment for him. He also found that those other sites would "collectively still fall short of the full [objectively assessed need]", so they "[did] not amount to an alternative". This too was a matter of planning judgment.* [paragraph 66]
>
> *The decisive consideration was, clearly, the remaining need for market and affordable housing both in Crowborough and in the district as a whole.* [paragraph 68]
>
> *I do not think the policy in paragraph 116 of the NPPF obliged the inspector to deal in his decision letter with every potential site for housing in the district, one by one.* [paragraph 69]

[1] Goodman Logistics Developments (UK) Limited v SSCLG & Slough Borough Council [2017] EWHC 947 (Admin) at para 55.
[2] Wealden DC v Secretary of State for Communities and Local Government [2016] EWHC 247 (Admin)

1.2.7 On this basis, in light of relevant case law, an assessment of alternative sites ought to consider the ability of potential sites to meet the full need. In the event that they do not, and "collectively still fall short of the full [objectively assessed need]," they do "not amount to an alternative."

Scale of Need

1.2.8 Alongside whether there are suitable alternative sites to accommodate the Development, is the question of need for the Development itself. Policy E2 of the NPPF is clear that:

> *[S]ubstantial weight should be given to [t]he economic benefits of proposals for commercial development which allow businesses to invest, expand and/or adapt; especially where this would support the economic vision and strategy for the area, the implementation of the Industrial Strategy, support improvements in freight and logistics and/or reflect proposals for Industrial Strategy Zones and AI Growth Zones*

1.2.9 It also states that consideration should be given to whether specific locational requirements of the proposal are met by existing allocations in the development plan. This includes the availability of infrastructure (such as electricity network infrastructure to provide adequate grid connections, or water and wastewater capacity) makes certain locations particularly important, including opportunities to co-locate largescale generators and users of power (such as data centres).

1.2.10 The scale of need for cloud and hyperscale data centres in West London has been well established in recent Secretary of State planning decisions as well as at the local level, many of the specific to the Slough Availability Zone (SAZ). The most recent articulation of the scale of data centre need in West London by the Secretary of State was given in his decision to approve the recovered appeal at Manor Farm East (appeal ref. 3366043):

> *For the reasons given at IR11.67-11.79 and IR11.141, the Secretary of State agrees* ***the unmet need for data centre capacity in the SAZ is 1,259 MW*** *(IR11.67). He further agrees that there was no alternative to the appeal site and no alternatives that could meet the unmet need in general (IR11.69). He further agrees that there is an overwhelming demonstrable unmet need for the type of development proposed (IR11.79).* [para 17]

1.2.11 This ASA should be read in conjunction with all other documents and drawings submitted in support of the Application including further evidence on need prepared by Savills Economics, which assesses and confirms the scale of need for DC development within the HAZ.

1.3 Structure of the ASA

1.3.1 Section 2 sets out the methodology used in the ASA. The subsequent sections then apply the methodology and show the results of the ASA as follows:

- Section 3 sets out the Area of Search;
- Section 4 establishes the Site Size;
- Section 5 reviews sites for their suitability;
- Section 6 provides a detailed assessment of potentially suitable sites
- Section 7 sets out the conclusion of the ASA.

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

2. Methodology

2.1 Defining the Search Criteria

2.1.1 The proposed development of employment floorspace is intended to contribute towards meeting a specific and unmet need within the defined area of search. Within this area of search, the suitability and availability of a potential site shall depend on whether the site:

- meets the specific operational requirements of the end use(s); and
- is available to accommodate the Development in the identified timescale.

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

2.2 Stages of Assessment

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

- *Stage 1: Area of Search and Evidence Base* - This stage identifies the defined Area of Search for the ASA, as well as the evidence base being used to source the list of sites.
- *Stage 2: Minimum Site Requirements* - This stage establishes whether the available sites meet the minimum size requirement for the proposed development, to provide a shortlist of potentially suitable sites which will be assessed further.
- *Stage 3: Site Suitability Assessment* - This stage considers a range of additional factors, specific to the proposed DC use, to establish an alternative site's ability to deliver a comparable scheme.
- *Stage 4: Further Assessment and Site Comparison* - Should any sites pass Stages 1-3 of assessment, further assessment will take place to establish whether a site is available for the Development when all material considerations are taken into account.

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

2.3 Stage 1: Area of Search and Evidence Base

2.3.1 Stage 1 identifies the defined Area of Search, as well as the sources of supply in each LPA's evidence base.

2.3.2 The full list of sites was sourced from a review of a number of evidence base documents and planning application databases across the site search area spanning several Local Planning Authorities, as listed out below:

- London Borough of Hillingdon
- Ealing Council
- Slough Borough Council
- Buckinghamshire Council
- Royal Borough of Windsor and Maidenhead
- London Borough of Richmond-upon-Thames
- Spelthorne Borough Council
- London Borough of Harrow
- London Borough of Hounslow

2.4 Stage 2: Minimum Site Requirements

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

Criteria	Comments	Indicator	Score
Site Size	In order to accommodate at least a single data centre building of the Development, a site must be at least 6.27 ha.	Site is 6.97 ha or more	
		Site is between 6.27and 6.97ha	
		Site is below 6.27 ha	

2.4.2 Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 3. Sites which have an 'Amber' score will be considered less ideal but will be carried forward for further assessment at Stage 3.

2.4.3 All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 2 assessment.

2.5 Stage 3: Site Suitability Assessment

2.5.1 Stage 3 considers a range of more detailed factors, to establish the overall suitability of a potential site to accommodate a data centre. This stage of assessment draws upon publicly accessible information, including aerial photography, development plan documents and associated evidence base libraries.

2.5.2 Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 4. Sites which have an 'Amber' score will be considered less ideal but will be carried forward for further assessment at Stage 4. The table below summarises the indicators to be applied for each criterion:

Criteria	Comments	Indicator	Score
Proximity to Sensitive Uses	Cloud and hyperscale data centres require physical separation from sensitive uses such as residential, care homes, schools and colleges, and hospitals. The compatibility of other uses shall be categorised accordingly having regard to any mitigating circumstances (e.g. buffer zones) which may be present or capable of inclusion.	Site is not close to incompatible land uses.	
		Site is close to sensitive uses, but can be suitably mitigated.	
		Site is close to sensitive uses and cannot be suitably mitigated.	

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

2.5.3 Sites which achieve a 'Red' score will be considered unsuitable and will not be carried forward for assessment at Stage 4. Sites which have an 'Amber' score will be considered less idea but will be carried forward for further assessment at Stage 4.

2.5.4 All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 3 assessment.

2.6 Stage 4: Further Assessment

2.6.1 Should any sites pass Stages 1-3 of assessment, further qualitative assessment will take place to establish whether a site can be considered as an alternative when all material considerations are taken into account. Such material considerations may include, but are not necessarily limited to:

- The proportion of a site that does not form part of the Green Belt;
- The proportion of a site that constitutes land that is considered to be brownfield or is otherwise developed;
- Whether there are any adopted site allocations or planning permissions which support the development of all or part of a site;
- Whether there are any draft site allocations or live planning applications proposing the development of all or part of a site;
- Whether there are any site-specific constraints which may adversely affect the ability of the site to meet detailed operator requirements; and
- Whether there are any material considerations which are likely to exclude the development of the proposed use.

2.6.2 All findings under this stage of assessment are subject to a qualitative review as to whether there are any relevant material considerations which may affect the assessment findings, to reach a view as to whether a site passes Stage 4 assessment.

3. Stage 1 - Area of Search

3.1 Starting Parameters

3.1.1 This alternative site assessment identifies an Area of Search that is appropriate for a data centre. An area of search for data centre sites has conventionally been defined by proximity to three things:

- Connection to power;
- Connection to dark fibre; and
- Connection to nearby DCs.

3.1.2 The table below sets out these three metrics, and how they have been applied in a number of other recent data centre ASAs, alongside this one.

Alternative Site Assessment	Proximity to Power	Proximity to AZ	Proximity to Fibre
Woodlands Park	✓ 5km	✓ 10km	✓ 10km
Abbots Langley	Not Considered	✓ 8km	Not Considered
South Mimms	✓ 10km	✓ 20km	Not Considered
Manor Farm East	✓ 10km	✓ 10km	Not Considered
Manor Farm West	✓ 10km	✓ 10km	Not Considered
Sipson Garden Centre (the Application Site)	✓ 10km	✓ 10km	Not Considered

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

3.2 Connection to Power

3.2.1 A DC requires a connection to a Grid Supply Point (GSP). The only such points with appropriate proximity to the Hayes Availability Zone (see further commentary on the HAZ below) are at the Iver, Laleham, and North Hyde substations.

3.2.2 Owing to degradation of power over distance, a DC becomes more complex and less viable to operate the further it is from a grid connection. The established maximum distance is 10km. This has been adopted by other ASAs for DCs, and has been accepted at appeal and by the Secretary of State.[3]

3.2.3 The proposed development will be served by a single grid connection from the Laleham GSP. Notwithstanding this, for robustness purposes in this ASA it has been assumed that an alternative point of connection for a DC within the HAZ may, at least in theory, be possible from either the Iver

[3] Land East of South Mimms. Permission for Data Centre comprising up to 187,000sqm in Metropolitan Green Belt. Permission granted by Hertsmere Borough Council (subject to s.106) on 12 February 2025. Planning application reference: 24/1152/OUTEI
Woodlands Park Landfill Site. Application for Data Centre comprising up to 72,000sqm in Metropolitan Green Belt. Application refused by Buckinghamshire 25 June 2024. Appeal recovered and allowed on 09 July 2025. Planning application reference: PL/24/0754/OA.

or the North Hyde GSP in the future (notwithstanding understood capacity limitations at these substations).

3.2.4 With regard to power, we have therefore applied a limit of no more than 10km from a GSP substation, being any one of the Laleham, Iver, or North Hyde substations.

3.3 Proximity to Availability Zone

3.3.1 A key locational requirement of cloud and hyperscale DCs is that they are located close to other DCs in clusters or groups of inter-reliant semi-independent DCs, known as Availability Zones (AZs). The critical concern for DC operators is ensuring that latency (the time it takes for data to travel from one point to another) is as low as possible. The lower the distance between DCs, the lower the latency between them. DCs connect to both the wider network and each other via fibre optic cables. In this way, AZs enable mutual cross support in the event of a DC loss by providing the capability for a DC to be replaced (instantaneously) when a failure arises.

3.3.2 AZs are not delineated geographically but have broad characteristics:

- a group of DCs (usually at least three) connected over a redundant, high speed, low latency private link;
- physically and infrastructurally separate from other AZs; and
- a DC cannot be part of more than one AZ.

3.3.3 A single AZ provides a certain quantity of IT load (measured in megawatts, "MW"), distributed across multiple DCs, with a large amount of resilience built in via active redundancy. The need for very high reliability drives parent-child and load balancing arrangements.

3.3.4 In recent data centre planning appeals, ASAs which have considered a single AZ (as opposed to multiple AZs within a region) have been found to be sufficient for establishing a lack of alternative sites. In the appeal decision at Court Lane Industrial Estate,[4] the Secretary of State agreed with the Inspector who had recognised the evidence, put forward by the appellant, that other AZs around London were not able to cater to the same market as Slough:

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

3.3.5 In the appeal decision at Abbots Langley,[5] the Secretary of State agreed with the Inspector who had acknowledged that each AZ is operationally separate, and it is not possible to consider them interchangeably. Need within one AZ can only be met by increasing the available supply of IT load within that specific area:

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

[4] Court Lane Industrial State. Application for Data Centre comprising up to 65,000sqm in the Metropolitan Green Belt. Application refused by Buckinghamshire 17 October 2023. Appeal recovered and allowed 06 December 2024. Planning application reference: PL/22/4145/OA
[5] Bedmond Road, Abbots Langley. Application for Data Centre comprising up to 84,000 sqm in the Metropolitan Green Belt. Application refused by Three Rivers 25 January 2025. Appeal recovered and allowed 12 May 2025. Planning application reference: 23/1068/OUT

> *the likelihood of a fault or disruption is high.* ***Demand for additional services from a particular zone can therefore only be met within that AZ.***
>
> *However, whilst this means that – for example – Slough, Hayes or Docklands need to continue to grow in order to meet the need and demand, this is not instead of, or at the expense of another AZ, such as Hemel Hempstead.* ***In this respect, sites outside of the Hemel Hempstead AZ and sites within other AZs do not address the specified need in Hemel Hempstead in order to create a balanced load.***
>
> *Given the scale of need across the London Availability Region, and the need for load balancing to work efficiently, I consider that the Alternative Sites Assessment was justified in only looking at sites within the Hemel Hempstead AZ. (emphasis added)*

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

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

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

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

3.3.8 The HAZ is centred on the Virtus data centre cluster of Horton Road. DCs in the HAZ have been developed on available brownfield land on established industrial sites.

3.3.9 The accepted maximum cable length connecting DCs within an AZ is 20km. However, obstacles and constraints arising during construction mean that cables are rarely laid down in a straight line. In order to guard against unforeseen complications during construction, the geographical distance is often shorter. Both the Manor Farm East and the Woodlands Park ASAs set a maximum preferred distance of 10km. Abbots Langley applied a maximum of 8 km. These methodologies were accepted at appeal.

3.3.10 It is noted that the ASA for South Mimms set a distance of 20km, however, this is considered beyond the limit of a practically viable distance, especially in an area as constrained by development as Hayes / West Draton (where cable routing is likely to be far more complex). A crow-flies distance of 10km was used for both the Woodlands Park and Manor Farm East ASAs, and (unlike the South Mimms ASA) was tested at appeal and found to represent a strong approach. Accordingly, 10km has been applied in this ASA.

3.4 Fibre Availability

3.4.1 Another key locational requirement of hyperscale DCs is proximity to dark fibre: unused (unlit, hence 'dark') fibre optic cable that is used to connect a DC to the rest of the internet. DCs must be as close as possible to dark fibre to reduce latency. Slough has emerged as a key location for DCs because of its proximity to fibre links connecting London (and Europe) to the U.S.A. In this, the area is unique

to the UK. In so far as the West London is close to London as a major financial centre, it is unique to Europe. The area has 'Europe's largest collection of data centres.'[6]

3.4.2 The ASA prepared by Stantec for the South Mimms application[7] set a preferred distance of 5km, and an absolute maximum of 10km from a dark fibre connection. South Mimms is not in the HAZ.

3.4.3 We have been instructed that the availability of fibre in the area of the Application Site is sufficiently plentiful that we need not identify this as a constraint for the purposes of establishing an Area of Search.

3.5 Concluding Comment on Area of Search

3.5.1 Based on the preceding assessment, we have used an area of search that is:

- within 10km of the central point of the HAZ (identified as the cluster of Virtus data centres known as London 5, 6, 7, & 8); and
- within 10km of a GSP substation.

3.5.2 We consider that this is a robust methodology and show the site search area considerations below.

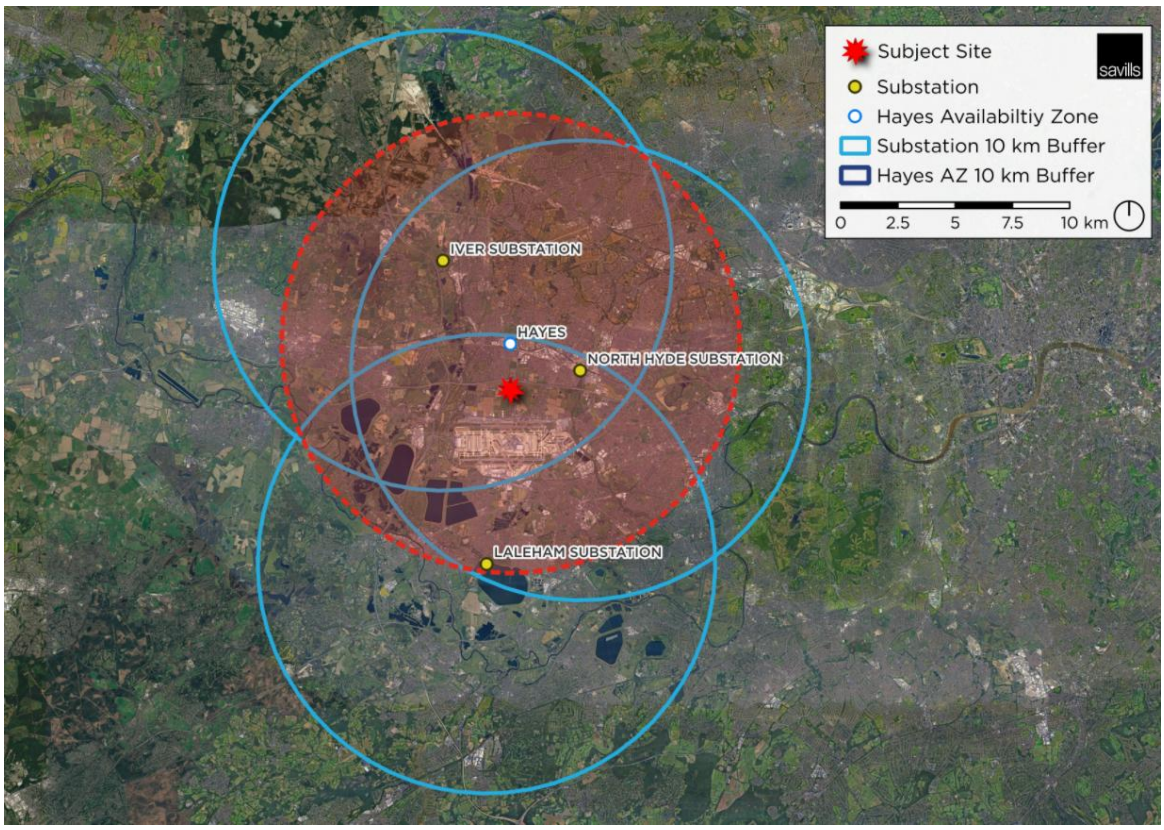


Figure 1: Image Showing Substation and HAZ Areas

[6] Why is this town Europe's largest data centre hub? (BBC News, 21 May 2024, https://www.bbc.co.uk/news/articles/cyrl7nlnkjpo)
[7] Land East of South Mimms. Permission for Data Centre comprising up to 187,000sqm in Metropolitan Green Belt. Permission granted by Hertsmere Borough Council (subject to s.106) on 12 February 2025. Planning application reference: 24/1152/OUTEI

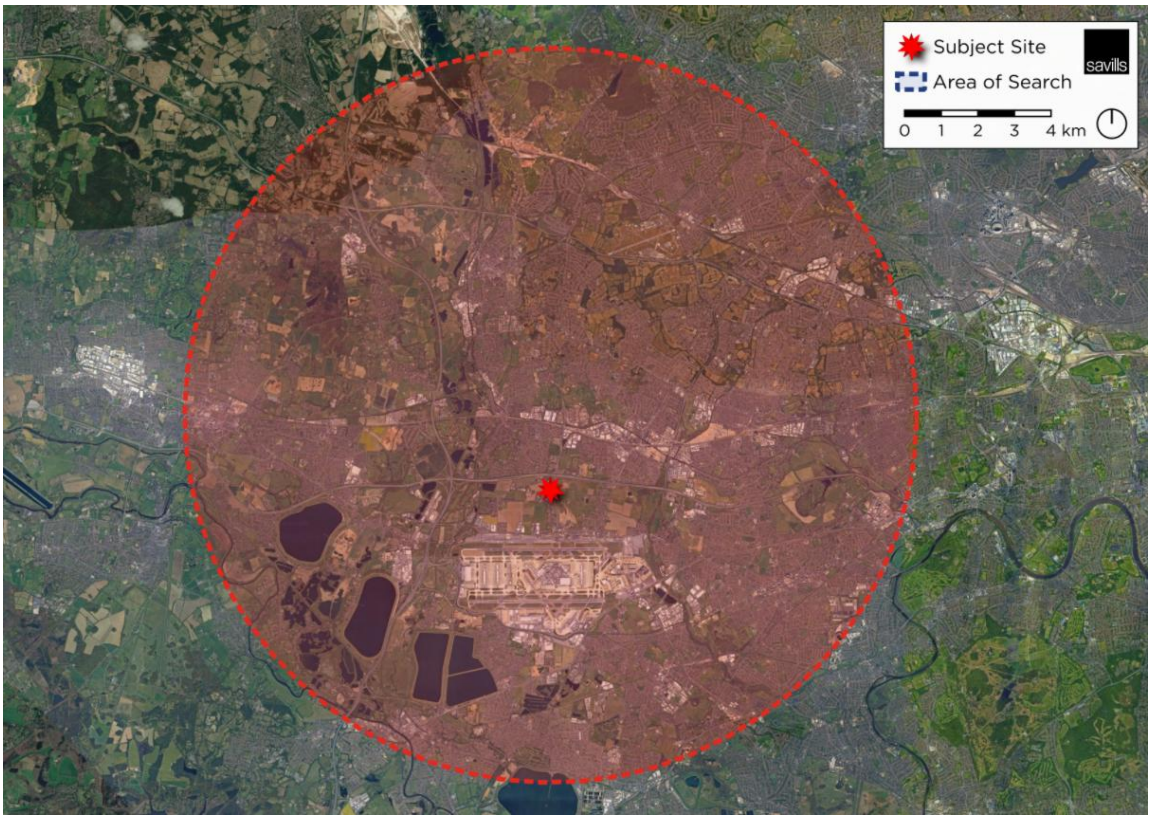


Figure 2: Final Area of Search

4. Stage 2 - Site Size

4.1 Minimum Site Size

4.1.1 The Development is an outline scheme for a DC scheme on a site of approximately 6.97 ha. To ensure robustness, a tolerance of -10% of the site area will be applied.

4.2 Disaggregation

4.2.1 The NPPF does not provide any specific guidance regarding the consideration of alternative sites for industrial uses, however case law has established firm principles on the approach.

4.2.2 Paragraph 29 of the Supreme Court Decision in *Tesco Stores Limited v Dundee City Council* (March 2012) provides clarity on demonstrating flexibility in the consideration of alternative sites and states that it is whether any alternative site would be "suitable for the proposed development, not whether the proposed development can be altered or reduced so that it can be made to fit an alternative site".

4.2.3 This premise was reiterated in the Rushden Lakes Secretary of State appeal decision,[8] which states at paragraph 8.45 of the Inspector's Report that:

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

4.3 Potential to Disaggregate Scheme

4.3.1 The Application to which this ASA relates a DC scheme capable of delivery 54 MW of IT load with a maximum building height of 20m.

4.3.2 With regard to the potential to disaggregate the scheme, the issue of scale is critical to the efficiency of operation. The greater a DC's size, the greater its operational efficiency. Two DCs with 5,000sqm of floorspace each, for example, will not be able to provide the same IT load as one DC with 10,000sqm. It is therefore not possible to disaggregate a data hall without increasing the overall land take for the same level of IT load. DC need in the HAZ is being driven largely by cloud and hyperscalers, and this itself informs the scale of developments, as these occupiers require units capable of accommodating large IT loads.

4.3.3 As set out in the Planning Statement submitted with the Application, the grid connections secured are capable of being operational by 2030, providing a unique opportunity for the Development to rapidly meet unmet need and avoid the significant constraints and delays to power supply being experienced in the West London area.

[8] Land Adjacent to Skew Bridge Ski Slope. Application for mixed use retail and leisure development in Metropolitan Green Belt. Application recovered and allowed by Secretary of State on 11 June 2014. Planning application reference: EN/12/00010/FUL; appeal reference APP/G2815/V/12/2190175.

4.4 Stage 2 Conclusions

4.4.1 Applying a robust flexibility of -10%, the minimum acceptable site size is 6.27 ha. The identification of sites meeting this requirement within the Area of Search is shown in the table below.

Site Name	Site Size (ha)
Area SE of Iver (west of M25)	
Area West of Denham Green	
Axis, Langley (south of Langley train station)	
Brett Aggregates, Slough	
Cemex Site, Iver	
Crown Plaza, Stockley	
Former Akzo Nobel Site, Slough	
Former Colnbrook Landfill Site	
Heathrow Distribution Centre	
Land North of Allerds Road, Slough	
Court Lane Industrial Estate, Iver	
Land South of Hedgerley Lane	
Land South of Hollybush Lane	
Dromenagh Farm	
Land to the East of Bangors Road/East of M25	
Caldicott Prep School	
Link Park, Heathrow	
Manor Farm East	
North of Langley train station	
Phase 4, Stockley Park	
Ridgeway Business Park	
SIFE	
Slough Trading Estate	
Thorney Business Park	
Wapsey's Wood Landfill Site	

Site Name	Site Size (ha)
West London Industrial Park, Iver Lane	
West of Iver Heath (SE of Five Points Roundabout)	
West of Iver Heath (NE of Five Points Roundabout)	
Western International Market	
Wexham Springs	
Woodlands Park	
Land South of Slough Road	
Poyle Industrial Estate	
Land to the West of Pinewood Road	
Manor Farm West	
Land at Denham	
Springfield Road east of Minet Country Park	
Bulls Bridge, North Hyde Gardens	
Former Nestle Factory	
Pump Lane, Hayes	
Chailey Industrial Estate	
Silverdale Road/Western View	
Union House	
Fairview Business Centre	
Eastern End of Blyth Road	
The Old Vinyl Factory and Gatefold Building	
Crown Trading Estate	
Covert Farm, Heathrow	
Blyth Road, Clayton Road, Printinghouse Lane	
Rigby Lane / Swallowfield Way	
Stockley Park	
Stockley Close	
Former Vehicle Testing Station, Cygnet Way	
Former Allotments and Melrose Close Car Park, Burns Close	

Site Name	Site Size (ha)
Stonefield Way,	
Braintree Road,	
Odyssey Business Park	
Bourne Court	
All Souls & West London, Shooting School	
Arnold Road, Northolt	
Eastcote Lane, Northolt	
Mandeville Road, Northolt	
Greenford Green	
Rowdell Road, Northolt	
Hotspur Road, Northolt,	
Yeading Lane, Northolt	
Aspen Lane, Northolt	
Westway Cross Retail Park, 1000 Greenford Road, Greenford	
Gurnell Leisure Centre, Ruislip Road East, Ealing	
High Lane Estate, Hobbayne, Road, Hanwell	
Fleming Road, Southall	
Land at Copley Close	
St Bernard's Hospital	
Windmill Lane, Southall,	
Glade Lane, Southall, .	
Havelock Road	
Land at Bridge Road	
The Green / Featherstone Road / Dominion Road	
South Road / Park Avenue	
Beaconsfield Road / South Road	
The Straight Southall	
Land at Johnson Street	
Park View Road, Ealing .	

Site Name	Site Size (ha)
Grange Farm Crescent, Harrow	
140 Northolt Road, South Harrow	
Land at Hatton Fields	
Shakespeare Avenue,	
Land r/o, Ciba House, Dick Turpin Way	
Heathrow International Trading Estate	
A312/The Parkway and A4 Bath Road	
Cavalry Barracks, Beavers Lane	
Convent Way, Southall	
New Heston Road,	
50 Sutton Lane,	
Land at Green Lane, Hounslow	
Central Park Trading Estates, Staines Roa	
St Albans Farm, Staines Road	
Lidl, New Road, Feltham	
Feltham Garrison	
Leisure West, Air Park Way	
98 High St, Feltham	
Salisbury Road,	
Bath Road / Hounslow West Station and Car Park	
Centaurs Business Park	
Bren Osterley Extra Syon Lane	
West Cross Industrial Estate	
Boston Manor Road	
980 Great West Road	
Commerce Road	
Land south of the High Street	
Gunnersbury Park, London	
Lionel Road South	

Site Name	Site Size (ha)
DUKES MEADOW	
Kneller Hall, Kneller Rd, Whitton, Twickenham	
Twickenham Stadium (Rugby Football Union)	
Richmond upon Thames College (RuTC)	
The Stoop (Harlequins Rugby Football Club)	
Land to West of Long Lane and South of Blackburn Trading Estate	
Stanwell Bedsits, De Havilland Way	
Land at Northumberland Close	
Tesco Extra, Town Lane	
Land East of Desford Way	
Land at Staines and Laleham Sports Club, Worple Road	
Hayes Bridge Retail Park / Heathrow Interchange	
Tudor Works, Beaconsfield Road	
Silverdale Industrial Estate, Silverdale Road	
Prologis Park, Stockley Road	
International Trading Estate, Trident Way	
Former Honey Monster Factory, Bridge Road	

4.4.2 Sites identified in red have not been taken forward for Stage 3 assessment

5. Stage 3 - Site Suitability

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

5.2 The result of this exercise is shown in the table below:

Site Name	Proximity to Sensitive Uses	Visual Impact	Environmental Designations	Flood Zone	Access Arrangements	Ownership
188-216 Bath Road						
Area West of Denham Green						
Axis, Langley (south of Langley train station)						
Brett Aggregates, Slough						
Cemex Site, Iver						
Crown Plaza, Stockley						
Former AkzoNobel Site, Slough						
Former Colnbrook Landfill Site						
Heathrow Distribution Centre						
Court Lane Industrial Estate, Iver						
Land South of Hollybush Lane						
Dromenagh Farm						
Land to the West of Bangors Road						
Manor Farm East						
Manor Farm West						
North of Langley train station						
Phase 4, Stockley Park						
Ridgeway Business Park						
SIFE						
Slough Trading Estate						

Alternative Site Assessment

Site Name	Proximity to Sensitive Uses	Visual Impact	Environmental Designations	Flood Zone	Access Arrangements	Ownership
Thorney Business Park						
Wapsey's Wood Landfill Site						
West London Industrial Park, Iver Lane						
West of Iver Heath – SE of Five Points Roundabout						
West of Iver Heath (NE of Five Points Roundabout)						
Western International Market						
Wexham Springs						
Woodlands Park						
Land South of Slough Road						
Poyle Industrial Estate						
Land to the West of Pinewood Road						
Manor Farm West						
Land at Denham						
Springfield Road East of Minet Country Park						
North Hyde Gardens / Bulls Bridge						
Former Nestle Factory						
Chailey Industrial Estate						
Blyth Road, Clayton Road,						
Rigby Lane / Swallowfield Way						
Stockley Park						
Stonefield Way, South Ruislip						
Braintree Road, South Ruislip						
Arnold Road, Northolt						
Greenford Green						
Yeading Lane, Northolt						
All Souls & West London, Shooting School						

Site Name	Proximity to Sensitive Uses	Visual Impact	Environmental Designations	Flood Zone	Access Arrangements	Ownership
Gurnell Leisure Centre						
Fleming Road, Southall						
Land at Copley Close						
St Bernard's Hospital						
Windmill Lane, Southall,						
Havelock Road						
Land at Bridge Road						
The Green / Featherstone Road / Dominion Road						
The Straight Southall						
Park View Road, Ealing						
Land at Hatton Fields						
Shakespeare Avenue,						
A312/The Parkway and A4 Bath Road						
Cavalry Barracks, Beavers Lane						
Convent Way, Southall						
New Heston Road,						
Feltham Garrison						
Centaurs Business Park						
West Cross Industrial Estate						
Boston Manor Road						
Gunnersbury Park, London						
Dukes Meadow						
Kneller Hall, Kneller Rd						
Richmond upon Thames College (RuTC)						

5.3 Any site that received a red for any one of the criteria were not carried forward. All remaining sites were taken through to Stage 4.

6. Stage 4 – Site Assessment

6.1 Site List

6.1.1 This section provides detailed assessment of the sites that passed Stage 3. For the purpose of this Stage, we have structured the Assessment to consider sites outside of the Green Belt first, followed by Green Belt sites. Stage 4 relates to the sites listed in the table below:

Green Belt Status	Sites
Outside Green Belt	Axis, Langley (South of Langley Train Station) Former Akzo Nobel Site, Slough Heathrow Distribution Centre Former Nestle Site Centaurs Business Park Feltham Garrison Greenford Green Convent Way
Green Belt Sites	Land at Hatton Fields Dromenagh Farm Manor Farm East Thorney Business Park Western International Market Wexham Springs Former Colnbrook Landfill Land South of Hollybush Lane Phase 4, Stockley Park SIFE Woodlands Park Land South of Slough Road Cemex Site, Iver Land to the West of Pinewood Road Manor Farm West Land at Denham

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

6.2 Axis Langley, South of Langley Train Station

6.2.1 The site is part of an Existing Business Area, and a portion of the site is allocated for a proposed new supermarket as defined in the Slough Local Plan Proposals Map.

6.2.2 Outline planning permission (ref. P/00437/093) was granted 29 January 2021 for a single DC. Outline planning permission (ref. P/00437/093) was granted 29 January 2021 for Data Centre development, alongside an additional 9,650 sqm of floorspace to provide up to 60 dwellings, retail, and an energy centre.

6.2.3 More recently, an EIA Scoping Request has been submitted by MSFT MCIO LTD relating to the proposed redevelopment of the Site for a Data Centre campus and substation (P/00437/096).

Documents submitted with the Scoping Request identity the applicant intends to submit two separate applications for the Data Centre and ancillary/auxiliary development, and a separate application for the substation.

6.2.4 Owing to the recent planning history and ongoing Scoping Opinion request made by MSFT MCIO LTD, the site is not considered to be available for development, and is not a suitable alternative site for the Development.

6.2.5 Even with the delivery of the scheme, there would still be overwhelming need for DCs in the HAZ, as set out later in this Assessment.



Figure 3: Indicative Layout – EIA Screening (ref. P/00437/096)

6.3 Former AkzoNobel Site, Slough

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

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

6.3.3 Outline planning permission (ref. P/00072/096) was granted on 19 November 2020 for up to 1,000 dwellings and up to 71,535 sqm of DC use. Since then, Reserved Matters Applications have been approved for the full datacentre element of the scheme, absorbing both the available land and the datacentre allocation; the site is therefore not available for further DC development.

6.3.4 In addition, the portion of the site devoted to the residential element of the Outline has a pending application for a new datacentre (submitted by Equinix). This is for 90,614sqm of GEA DC.

Reference	Proposal	Date of permission	Comment

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

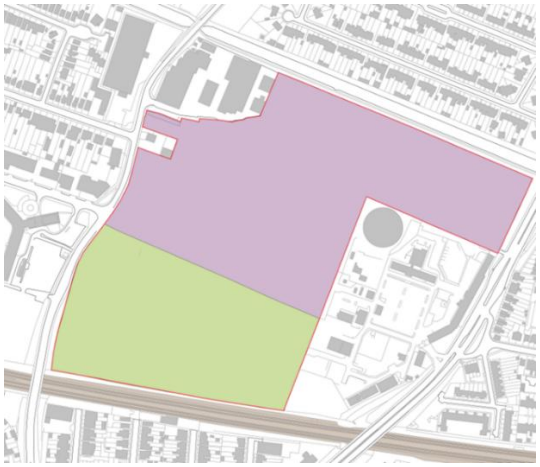


Figure 4: Approved Parameter Plan for AzkoNobel Site (ref. P/00072/096). Showing Industrial portion in purple, and residential in green

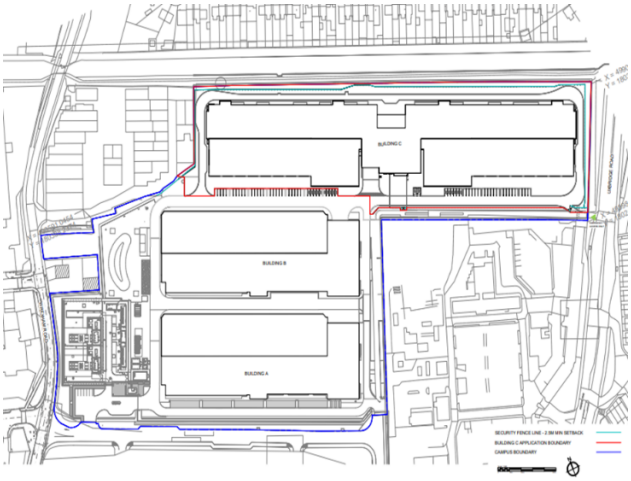


Figure 5: Approved RMA schemes showing the two datahalls approved under P/00072/108 (Buildings A & B) and under P/00072/139 (Building C)

6.3.5 Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site for the Development.

6.3.6 Even with the delivery of the scheme, there would still be overwhelming need for DCs in the HAZ, as set out later in this Assessment.

6.4 Heathrow Distribution Centre

6.4.1 The site is part of an Existing Business Area, as defined in the Slough Local Plan Proposals Map. Core Policy 5 of the Core Strategy states that "there will be no loss of the defined Existing Business Areas to non-employment generating uses, especially where this would reduce the range of jobs available."

6.4.2 At present, the site is previously developed in full, and contains traditional I&L development. This includes a large-scale distribution centre understood to be occupied and operated by Royal Mail. To facilitate redevelopment the existing occupiers would require vacation and relocation. This includes for Royal Mail who occupy a largescale distribution centre.

6.4.3 The site is therefore considered not to be available for development, and is not a suitable alternative site for the Development.

6.5 Former Nestle Factory

6.5.1 The site is located within a boarder industrial context and is located towards the edge of the industrial boundary.

6.5.2 Planning permission has granted under several permissions across the site for comprehensive redevelopment to deliver strategic redevelopment known as 'Hayes Village'. The applications include those identified in the table below. These permissions are understood to be in the process of being implemented / built out.

Ref.	Description of Development	Approved
1331/APP/2017/1883	Part demolition of existing factory buildings and associated structures, and redevelopment to provide 1,386 dwellings (Use Class C3). office, retail, community and leisure uses (Use Class A1/A3/A4/B1/B8/D1/D2), 22,663sq.m (GEA) of commercial floorspace (Use Classes B1c/B2/B8 and Data Centre (sui generis)), amenity and playspace, landscaping, allotments, access, service yards, associated car parking and other engineering works.	13/12/17
1331/APP/2019/2314	Development of 4 no. new buildings comprising residential units (in addition to those approved under planning permission ref: 1331/APP/2017/1883), a basement extension to Block B, flexible commercial uses (Class E) and associated landscaping, access, car parking and other engineering works.	08/12/20
77214/APP/2022/3382	Redevelopment of the site to erect a part 11 storey, part 10 storey mixed use building comprising 121 residential dwellings (Class C3) and ground level commercial premises (Class E) along with public realm delivery of Green Super Highway with associated landscaping, access, and parking following demolition of existing buildings.	06/08/25

6.5.3 Owing to the recent planning history, the site is therefore considered not to be available for development and is not a suitable alternative site.

6.6 Centaurs Business Park

6.6.1 The site lies within a Strategic Industrial Location (SIL) and is allocated for mixed use employment within Houslow's Local Plan. It is fully developed and is majority owned and occupied by Sky UK Ltd, a television broadcaster.

6.6.2 The allocation is for mixed use employment, with justifying text stating that:

> *The continued use of this site as a media campus is supported as it makes a major contribution to the further development of the Great West Corridor as a digital and media hub and to the creation of jobs. It is recognised that the nature of broadcasting does not fit neatly into planning use classes so flexibility is imperative in order that the media campus can develop.*

6.6.3 The site is also identified within the Brentford Area Action Plan as a Media Campus

6.6.4 Notwithstanding the clear policy support for development relating to the support of the existing media use only, if the site were to be evacuated in order to allow for a data centre scheme, the existing

occupier would need to find alternative accommodation elsewhere. This would require a large, purpose-built campus on a similarly sized site.

6.6.5 The site is owner occupied by a television broadcaster with specialist requirements and the site is allocated specifically for media related uses. There is no indication that it will be made available for redevelopment to an alternative use in the short- to medium-term. It is not considered to be a suitable alternative site..

6.7 Feltham Garrison

6.7.1 The site is identified in the emerging Hounslow Local Plan 2020-2041 as a strategic residential-led mixed-use allocation (Site Allocation 64: MOD Feltham) comprising approximately 1,370 residential units, 4,340 sqm of business floorspace, 11,310 sqm of health and community floorspace, a new school, public open space and associated infrastructure. The allocation is therefore directed towards delivering significant housing growth and community infrastructure rather than strategic employment or industrial uses.

6.7.2 The proposed land uses identified within the allocation comprise Residential (C3), Business (Class E), Community Uses, Open Space and supporting uses, with no reference to industrial, storage, distribution or digital infrastructure uses. A standalone data centre would therefore be fundamentally different from the development envisaged by the allocation.

6.7.3 The site contains designated Local Open Space. In addition, the site contains playing pitches, which are required to be retained and enhanced as part of redevelopment proposals. These requirements could significantly constrain the developable area available for a data centre campus.

6.7.4 The site is also subject to a range of heritage considerations arising from its proximity to the Feltham Green and Town Centre Conservation Area, the Grade II Listed Red Lion Inn and Grade II Listed Feltham House. The scale, massing and operational infrastructure associated with a data centre may therefore give rise to additional heritage and townscape constraints.

6.7.5 The site remains in public ownership, and the allocation identifies a clear strategic role for the land in meeting housing and community infrastructure needs over the period 2026-2036. Given the site's contribution towards housing supply, there would likely be significant policy resistance to an alternative form of development that would not deliver the planned residential and community uses.

6.7.6 The site is not considered to be available for the proposed Development, and is therefore not a suitable alternative site.

6.8 Greenford Green

6.8.1 The site is bisected by the Grand Union Canal, with land to the south designated as a Strategic Industrial Location (SIL). A portion of the SIL, which has recently been redeveloped for residential use, is proposed to be removed from the SIL designation under the emerging Local Plan, which was submitted to the Secretary of State by Ealing Council in November 2018.

6.8.2 The adopted Plan includes the site as part of a wider strategic site (ref. OIS7 Greenford Green) which seeks to introduce employment-led development north of the canal with “the introduction of residential / community uses” Land north of the Canal has instead been developed for a residential-led scheme (ref. 164694FUL) with additional residential development south of the Canal on an area now proposed for removal from SIL.

6.8.3 The remaining portion of the site is fully and intensively developed, and understood to be in active use and fully occupied by a logistics operator.

6.8.4 It measures approximately 6.6 ha, which is large enough to accommodate the proposed Development, but would necessitate the loss of total employment floorspace on site owing to the insensitive nature of existing development, which is estimated to be approximately 75%. The existing occupier would need to be relocated. Owing to the plot ratios at which most sites are developed, this would be expected to require a greater land take, considering that typical ratios are now rarely higher than 60% and most commonly no higher than 40%.

6.8.5 Even if a data centre scheme were to come forward, there would still be an overwhelming need for data centres in the HAZ. Therefore, it does not constitute a suitable alternative site for fully addressing the identified need.

6.9 Convent Way

6.9.1 The site is subject to an advanced estate regeneration proposal. A hybrid planning application has been submitted (ref. P/2022/1090) for:

> *Hybrid application for a phased estate regeneration development of the site comprising a maximum of 102,375 sqm (GIA) of floorspace; up to 89,875 sqm (GIA) as an outline permission (the Outline Component) and full planning permission for Phase A comprising 12,500 sqm (GIA) of residential development (the Detailed Component). The Detailed Component proposes erection of a building up to 13 storeys in height to provide 117 new homes (Use Class C3), together with access, servicing, car parking, cycle parking, cycle storage, plant, play and open space and landscaping. The Outline Component (all matters reserved) for: demolition of all buildings and structures, up to 1280 sqm (GIA) of flexible Commercial / Community Floorspace (Use Class E / F2), up to 80,785 sqm (GIA) of Residential Floorspace (Use Class C3) comprising up to 850 homes, up to 2,550 sqm (GIA) of Plant, up to 5,260 sqm (GIA) of Podium Car Parking, open spaces, landscaping, public realm and other associated and ancillary work.*

6.9.2 The site is actively being progressed for residential-led redevelopment and is therefore not considered available for the proposed data centre Development.

6.9.3 The scheme submitted under ref. P/2022/1090 aligns closely with the emerging allocation for the site within the emerging Regulation 19 Hounslow Local Plan 2020-2041, which identifies the site for a mixed-use residential-led regeneration scheme delivering approximately 750 homes together with supporting retail and community uses. The existence of both an emerging allocation and a live planning application demonstrates a clear development trajectory for the site to deliver comprehensive residential redevelopment.

6.9.4 The site is not considered to be available for the proposed Development, and is not a suitable alternative site.

6.10 Land at Hatton Fields

6.10.1 The site is located south of Heathrow Airport and currently comprises of undeveloped land which benefits from a draft allocation within the emerging Local Plan Much of the site is proposed for use as a Nature Zone / Biodiversity Enhancement Area and sports fields, and the southern portion of the site has an existing designation as a Site of Importance for Nature Conservation (SINC).

6.10.2 The draft allocation proposes the removal of 19.3 ha from the Green Belt for employment development, with 63,450 sqm of use within Classes B2 / B8. The allocation specifically sees a 'major new industrial and logistics business park'.

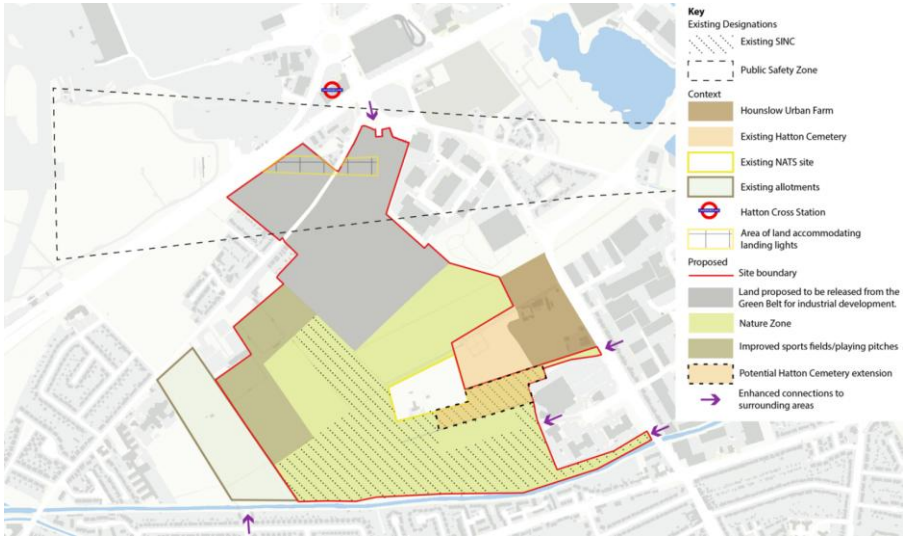


Figure 6: Proposed site allocation at Land at Hatton Fields

6.10.3 A significant portion of the land proposed for release from the Green Belt is within the Public Safety Zone at the eastern end of Heathrow Airport's southern runway, some of which is identified as an area of land accommodating landing lights. In Savills experience, such a location is not considered attractive to the data centre market, which is extremely risk averse. Aside from this, there are often constraints (such as building heights) that make data centre schemes unviable in such locations.

6.10.4 The allocation is explicitly for an industrial and logistics business park, and has been identified in the plan in order to meet identified needs for traditional I&L occupiers. Were a data centre use to come forward, thie would detrimentally impact the Council's supply of development land for traditional I&L uses, requiring the identification of additional land elsewhere.

6.10.5 Notwithstanding requirements of the allocation, the proximity to the runway, or the location within a Public Safety Zone, even if the site was to come forward for a data centre use, it would still not be capable of fully addressing the identified need for data centres within the HAZ.

6.10.6 The site is not considered to be a suitable site, nor is it considered to be a suitable alternative site for the proposed Development.

6.11 Dromenagh Farm

6.11.1 The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.

6.11.2 Planning permission was granted by Buckinghamshire Council under delegated powers on 12 June 2025 (ref. PL/24/2130/FA) for the redevelopment of the site to provide a new hyperscale DC. This was varied on 16 June 2026 (re. PL/25/6737/VRC) The Officer's Report for the 2025 permission states that the site was considered to be grey belt, and that the development would therefore not be inappropriate. The level of need within the Slough Availability Zone was also noted as a reason justifying approval.

Sensitive

6.11.3 Owing to the extant permission for the site's redevelopment, it is not available. Even with the delivery of the scheme there would still be overwhelming need for data centres in the HAZ.



Figure 7: Amended Ground Floor Plan at Dromenagh Farm (ref. PL/25/6737/VRC)



Figure 8: Amended Roof Plan at Dromenagh Farm (ref. PL/25/6737/VRC

6.12 Manor Farm East

6.12.1 The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and the Strategic Gap as defined in Slough's Proposals Map.

6.12.2 Permission was granted under an allowed and recovered appeal on 10 June 2026) (ref. APP/J0350/W/25/3366043 (local planning ref. P/10076/013) for:

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

6.12.3 Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site.

6.12.4 Even with the delivery of the scheme, there would still be overwhelming need for DCs in the HAZ.

6.13 Thorney Business Park

6.13.1 The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses.

6.13.2 Outline permission was granted by Buckinghamshire Council on 29 May 2024 (ref. PL/22/1775/FA) for the demolition of existing buildings on part of the site, and the construction of DC development.

6.13.3 Since then, two planning applications have been submitted on two separate portions of the site:

- PL/24/3532/OA – Outline application for demolition of existing buildings and construction of data centre development (validated 11 December 2024); and
- PL/25/4316/FA – Full application for demolition of existing buildings and construction of two data centre buildings with ancillary development (validated 30 January 2026).

6.13.4 Land covering applications PL/25/4316/FA and PL/22/1775/FA are identical, and constitute previously developed land in full. The majority of land relating to PL/24/3532/OA is undeveloped greenfield land. The figures below show proposals plans for all three applications.

6.13.5 Even with the delivery of the scheme (in part or, pending determination of the pending application) there would still be overwhelming need for data centres in the HAZ. The site is not available for the proposed scheme, nor is it capable of meeting the total need for data centre capacity in the HAZ.

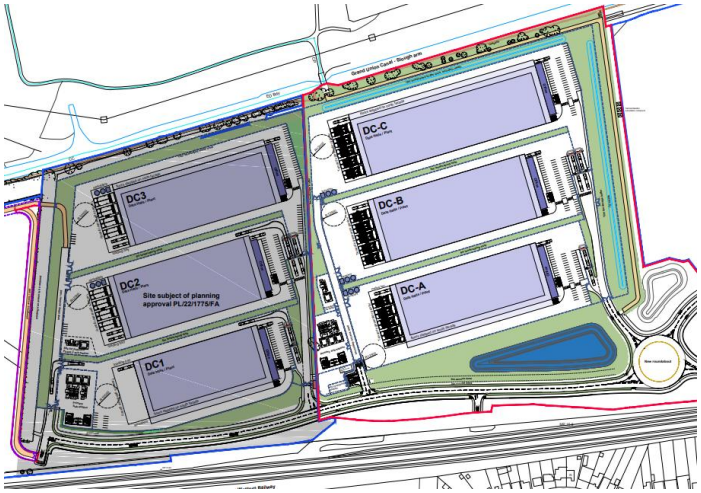


Figure 9: Pending outline application on right (ref. PL/24/3532/O) approved full application on left (ref. PL/22/1775/FA)

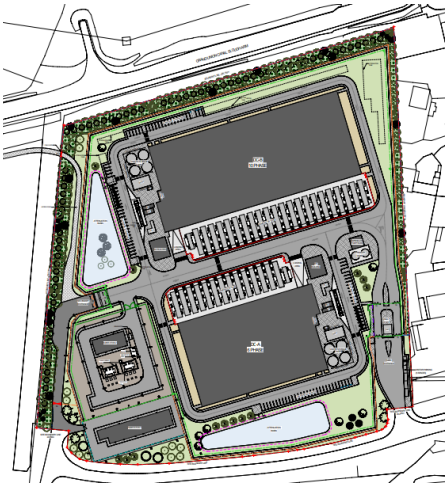


Figure 10: Proposed site plan (PL/25/4316/FA) [covering same land as PL/22/1775/FA]

6.14 Western International Market

6.14.1 The site is partially previously developed. The portion of the site that constitutes developed land is in active use containing traditional I&L uses and a Costco membership warehouse club. This portion of the site is under multiple ownerships (including Virtus, Costco, Glasgow City Council and the Mayor and Burgesses of the London Borough of Hounslow, and the BBC Pension Trust), and all of the occupiers of these units would require vacation and relocation. This portion of the site is not considered to be available for the Development.

6.14.2 The southern half of the site is currently undeveloped, and is under the single ownership of the Mayor and Burgesses of the London Borough of Hounslow. However, there is a planning permission on this land for mineral extraction approved on 26 May 2023 (ref. P/2020/4001). As set out in the Committee Report for this application, mineral extraction will take place over seven years, with an additional seven years required to infill the site.

6.14.3 In light of the site's status as a mineral extraction site, it is therefore considered that the site will not be available for a period of at least 14 years (i.e. not until 2039).

6.14.4 As set out in the Need Assessment prepared by Savills Economics in support of this Application, there is an immediate need for additional DCs.

6.14.5 On the basis that Western International Market will be unavailable for at least 14 years, it is not considered to be a suitable alternative site for the Development.

6.15 Wexham Springs

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

6.15.2 The Framewood Road Conservation Area Appraisal notes that :

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

6.15.3 The site is subject to heavy tree cover, and many of these are subject to TPO (either individually or as part of a group), and there is a Grade II listed structure on site (the Corn King and Spring Queen Sculpture). These are both shown in the Conservation Area map included below.

6.15.4 An outline planning application for the redevelopment of the site to provide a data centre was validated on 27 July 2022 and withdrawn 10 November 2022 (ref. PL/22/2710/OA). No reason was given, and no subsequent application has been submitted at the time of writing.

6.15.5 It would not be possible to deliver at least a single data hall of the Development without requiring the loss of protected trees, and the delivery of a DC would have a significant impact on the character of the Conservation Area. It is not a suitable site, and not a viable alternative to the Application Site.

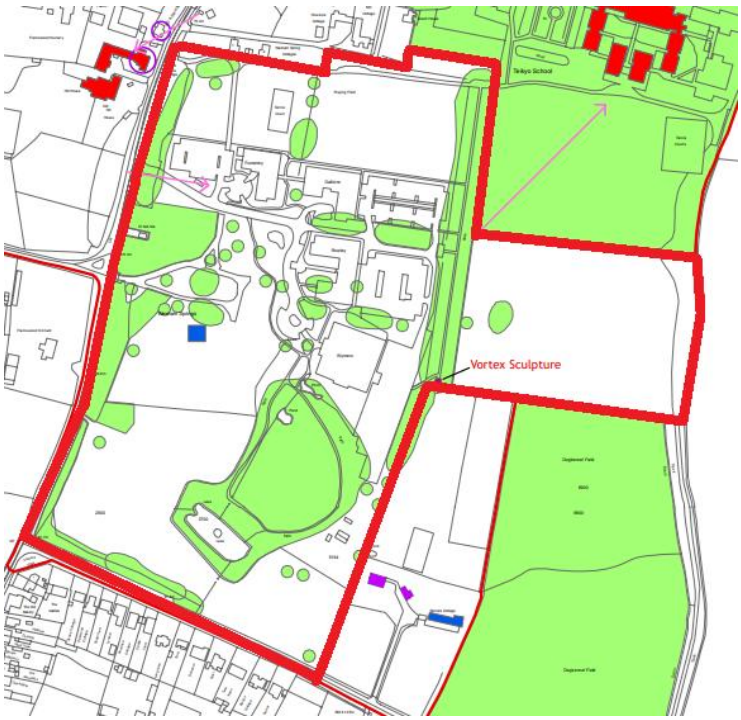


Figure 11: Extract of the Framewood Road Conservation Area Plan, showing (in green) all trees covered by a TPO at Wexham Springs. The blue square denotes the location of the Grade II listed structure.

6.16 Former Colnbrook Landfill

6.16.1 The site is within the Green Belt, the Colne Valley Regional Park, and the Strategic Gap, as defined in the Slough Local Plan Proposals Map.

6.16.2 The site is a former clay quarry and was first granted consent for a landfill in January 1983 (ref. SDB916/81). Landfilling operations were granted 02 March 2000 (ref. P/10033/05). This was amended in order to extend the restoration date to 30 June 2012 (ref. P/10033/016, approved 15 November 2010). There are no more recent planning applications for the site at the time of writing.

6.16.3 The site, in combination with the SIFE site, was subject (under ref. P/10792/000) to an application to deliver London International Freight Exchange (LIFE) on land bounded by the M4, the M25, Colnbrook Bypass and Sutton Lane. The application was refused on 01 June 1999, and dismissed at appeal on 20 August 2002. The Secretary of State, in determining the appeal, did not consider that the scheme would bring enough benefits to outweigh harm to the Green Belt.

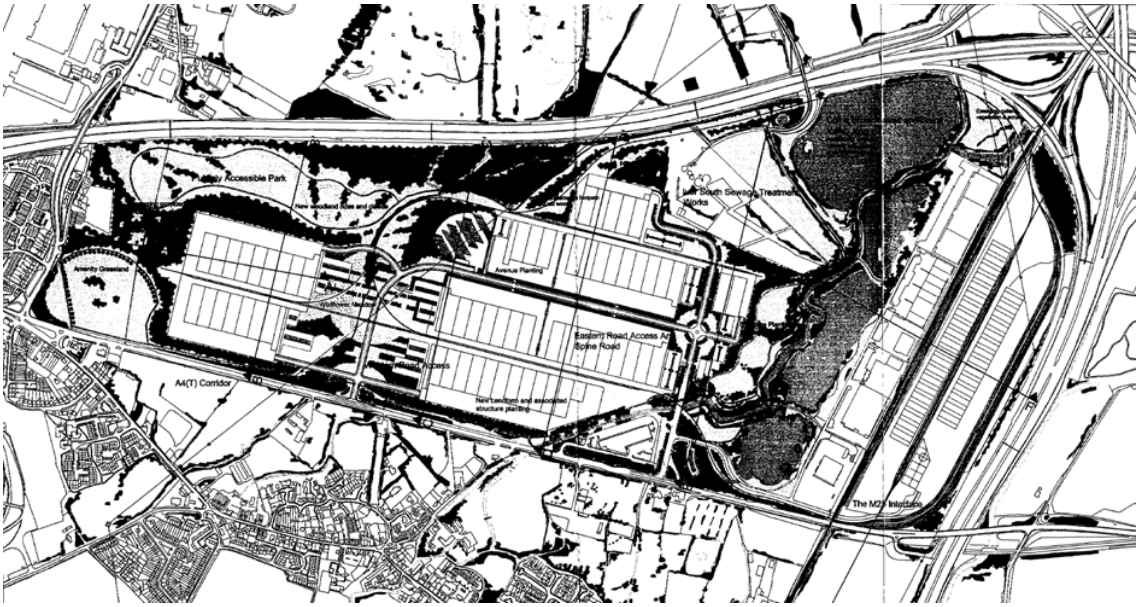


Figure 12: LIFE Scheme (P/10792/000)

6.16.4 At present, there is only one point of access onto the site. A secondary access would be required for a DC use. This would need to be from the A4, and would need to be subject to a Highways assessment. A secondary access may be unfeasible.

6.16.5 Former Colnbrook Landfill is considered to a be a more strongly performing Green Belt, set against relevant Green Belt purposes, than the Application Site. For this reason, the site is not a suitable alternative for the Development.

6.17 Land South of Hollybush Lane

6.17.1 The site is within the Green Belt, and the Colne Valley Regional Park, as defined in the South Bucks Local Plan Proposals Map.

6.17.2 The site is also within the Denham Aerodrome Safeguarded Area.

6.17.3 The site was used for mineral extraction in the 1950s and 1960s, and later as a landfill site. An outline planning application was validated 11 October 2023 (ref. PL/23/3252) for:

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

6.17.4 At the time of writing, this application is pending, and currently has an outstanding objection from Denham Aerodrome. The threshold height for safeguarding purposes is 10m, and the Aerodrome have stated in a consultation response that the maximum acceptable height is 12m. The height of the data centre component of the Application scheme is 23m to parapet, with a maximum screen height of 30m.

6.17.5 Beyond the pending application for an alternative use, and the fact that the site cannot potentially accommodate buildings in excess of 12m (preferably less than 10m), means that the site is not available for the Development.

6.18 Phase 4, Stockley Park

6.18.1 The site is within the Green Belt, and an Air Quality Management Area, as defined on the Hillingdon Local Plan Proposals Map.

6.18.2 The site is owned by Prologis and located adjacent to the south of Prologis Park West London and identified for expansion for traditional Industrial & Logistics development. The site is not available for an alternative use.

6.19 SIFE

6.19.1 The site is within the Green Belt, the Strategic Gap, and the Colne Valley Regional Park as defined in the Slough Local Plan Proposals Map.

6.19.2 The site was used for gravel extraction between the 1950s and 1970s and then for landfill until the 1980s. It was the subject of restoration to pasture in the 1990s.

6.19.3 The site, in combination with the Former Colnbrook Landfill site, was subject (under ref. P/10792/000) to an application to deliver London International Freight Exchange (LIFE) on land bounded by the M4, the M25, Colnbrook Bypass and Sutton Lane. The application was refused on 01 June 1999, and dismissed at appeal on 20 August 2002. The Secretary of State, in determining the appeal, did not consider that the scheme would bring enough benefits to outweigh harm to the Green Belt.

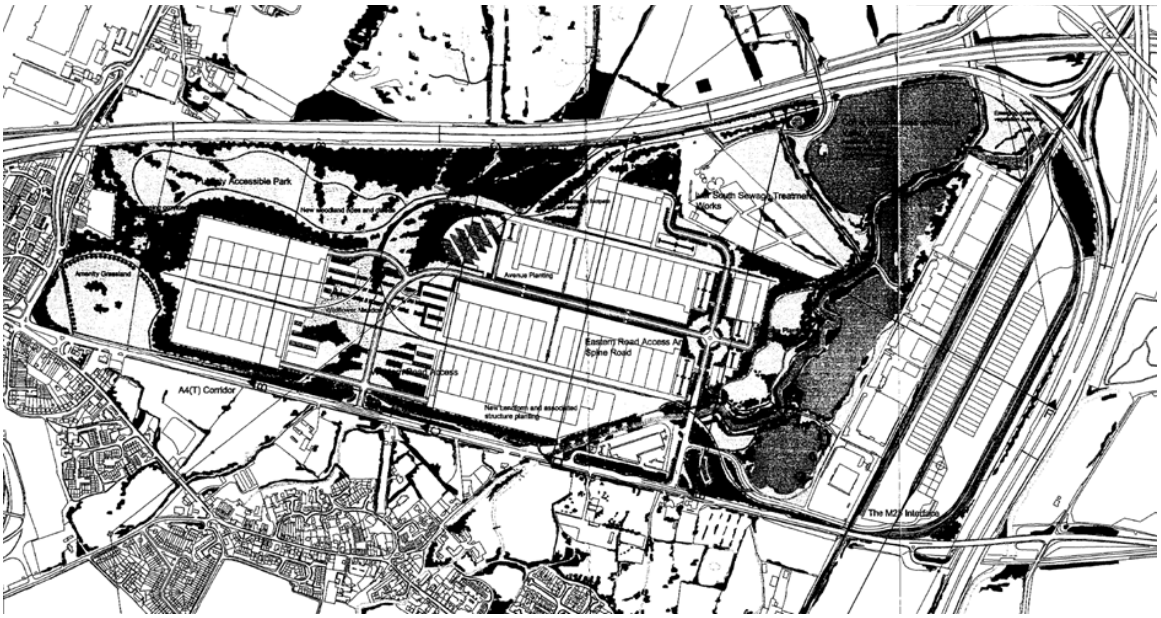


Figure 13: LIFE Scheme (P/10792/000)

6.19.4 Following this, outline planning permission (ref. P/14961/000) was sought on the SIFE site only for:

> *(Outline application) construction of a rail / road freight interchange comprising an intermodal terminal and class B8 distribution units, to include:*
>
> - *Infrastructure to enable the exchange of freight between road and rail, including railway sidings with a connection to the Colnbrook branch line and an intermodal terminal incorporating two overhead gantry cranes and external container storage;*
> - *Class B8 distribution units (up to 194,836 sqm floorspace), to include associated landscaping, access, parking and servicing areas;*
> - *Lorry parking area including facilities for drivers;*
> - *Two vehicular accesses on the A4 Colnbrook by pass and off site junction improvements (at M4J5, A4 junction with Sutton Lane, A4 junction with Stanwell Moor Road, A3044 junction with airport way and M25 J14);*
> - *Creation of new public rights of way, improvement works to existing public rights of way and diversions to existing public rights of way;*
> - *Engineering operations to remodel ground levels;*
> - *New landscaping including woodland and shrub planting, grassland areas and wetland creation and new boardwalk adjacent to Old Slade Lake.*

6.19.5 The application was recovered, and dismissed by the Secretary of State (SSCLG) on 12 July 2016. In the decision notice, the SSCLG found that:

> *Irreparable harm would be caused to this very sensitive part of the Green Belt. The benefits of the scheme do not clearly overcome the harm and so "very special circumstances do not exist to justify the development.*

6.19.6 The appellant (Goodman Logistics Development) challenged the dismissed appeal in Court[9] on the grounds that:

- There was a compelling need for an expanded network of Strategic Rail Freight Interchanges as set out the National Policy Statement for National Networks, and that the SSCLG had not given appropriate weight to this consideration;
- The SSCLG had failed correctly to interpret the Strategic Gap policy; and
- The SSCLG had failed correctly to interpret sections of the NPPF concerning openness of the Green Belt and/or failed to take into account a material consideration in that he treated visual matters as having no relevance to that issue.

6.19.7 All three grounds we dismissed. In the assessment of the Strategic Gap policy, Holgate J found that the following interpretation of the policy is the correct one: "the development and its location within the Strategic Gap are both essential."

6.19.8 The Judgement also commented on the consideration of alternative sites in the context of need:

> *Where need is a relevant consideration, for example, in order to overcome a Green Belt objection, the suitability of alternative sites will typically be linked to, or even dependent upon, the nature of the need case. The economic needs or market which the development is intended to serve may well affect or constrain the area within which alternative sites may be found. The development proposed may have site requirements (e.g. size, shape, topography) which constrain the area of search and suitability of alternatives. There may be locational requirements (e.g. proximity to railway lines and trunk roads) which are determined by the market needs which the development has to satisfy. Plainly, matters of that kind may also be directly related to the economic importance of those needs and the weight to be given to them in planning terms.* [paragraph 56].

6.19.9 The SIFE site is considered to a be a more strongly performing Green Belt, set against relevant Green Belt purposes, than the Application Site. For this reason, the site is not a suitable alternative for the Development.

6.20 Woodlands Park

6.20.1 The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.

6.20.2 Outline planning permission was granted under a recovered and allowed appeal on 09 July 2025 (ref. PL/24/07754/OA) for:

> *Outline planning application with all matters reserved except for principal points of access for the redevelopment of the former landfill site to comprise a data centre development (Use Class B8) of up to 72,000 sqm (GEA) delivered across 2 buildings to include ancillary offices, internal plant and equipment and emergency back-up generators and associated fuel storage. Cycle and car parking, internal circulation routes, soft and hard landscaping, security perimeter fence, lighting, earthworks, sustainable drainage systems, ancillary infrastructure and a substation.*

6.20.3 This allowed appeal follows two refused applications for a DC scheme comprising three buildings across 163,000 sqm on the same site. Application ref. PL/21/4429/OA was dismissed at appeal on

[9] Goodman Logistics Development (UK) Ltd v SSCLG & Slough Borough Council [2017] EQHC 947

02 September 2022; PL/22/3491/OA was refused by the Council on 18 May 2023. The permission is currently subject to a Judicial Review.

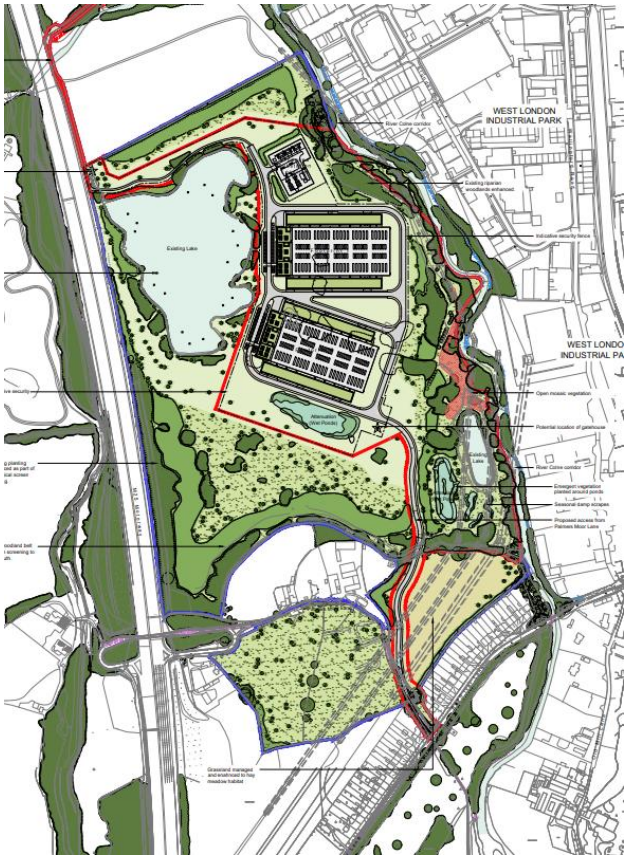


Figure 14: Woodlands Park Site Development Strategy Plan (ref. PL/24/0754/OA)

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

6.20.5 It is not available, and not a suitable alternative site.

6.21 Land South of Slough Road

6.21.1 The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.

6.21.2 An EIA Screening Request was validated 08 April 2025 (ref. PL/25/1155/EIASR) to establish whether the proposed development of a DC constituted on the site EIA development, the response – provided on 28 May 2025 – stated that an EIA was not warranted.

6.21.3 The site is currently subject to a pending planning application (ref. PL/25/2080/OA, validated 30 June 2025) for:

> *Outline planning application for proposed development of data centre building (Use Class B8), ancillary offices, plant and equipment, substation, new access/egress, internal road and bridge, landscaping, biodiversity and drainage features, upgrade works to the public right of way, and associated works (matter to be considered at this stage: access)*



Figure 15: Indicative Layout for Land South of Slough Lane (ref. PL/25/2080/OA)

6.21.4 The site is bisected east-west by Colne Brook, which is in Flood Zone 3, there is a single point of access from Slough Road (A4007), and the second point of access would need to be taken via the Woodlands Park site to the south, raising the risk of ransom. The site is also constrained by overhead power lines from the Iver Substation to the north.

6.21.5 Owing to these site constraints, the EIA screening request proposed a scheme that focussed development to the south of the site, and did not provide a secondary access point. In the absence of a secondary access point, the site is not considered to be suitable for a DC occupier.

6.21.6 It is not available, and not a suitable alternative site.

6.22 Cemex Site, Iver

6.22.1 The site is in the Green Belt and the Colne Valley Regional Park as defined in the South Bucks Local Plan Proposals Map. It is an Allocated Minerals Site in the Buckinghamshire Minerals and Waste Local Plan.

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

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

6.22.3 Conditions 48 states that extraction of minerals shall cease by 31 December 2022, and that the restoration of the site shall be completed by 31 December 2026.

6.22.4 On 18 May 2022, under reference NMA/0007/22, the Council permitted a Non Material Amendment to the description of development to remove the phrase 'over a period of up to nine years.'

6.22.5 On 08 December 2023, under reference CM/0028/22, the Council approved a s73 application that, *inter alia*, revised the time limit condition from the original permission to read:

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

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

6.23 Land to the West of Pinewood Road

6.23.1 The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and an Air Quality Management Area as defined in the South Bucks Local Plan Proposals Map.

6.23.2 Permission was granted in 1994 SBD/0595/90/C for the following:

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

6.23.3 The site benefits from three extant planning permissions for development, two relating to Pinewood Studios to the north, and one for a DC. These are summarised below.

Ref.	Description of Development	Decision	Date
PL/20/3280/OA	Outline planning permission with all matters reserved (except for principal points of access) for the phased development of a screen industries global growth hub of up to 750,000 sq ft (70,000 sqm) comprising: • A visitor attraction of 350,000 sq ft comprising a series of buildings • 350,000 sq ft of film production buildings (including sound stages, workshops, offices and an external film backlot) • Education and business hub (50,000 sq ft) • Associated parking and servicing • Green Infrastructure	Approved	11 April 2022
PL/22/2657/FA	A hybrid application to comprise: • Part A - A full application for the change in use of 25.6 ha of land at Alderbourne Farm to a nature reserve. • Part B - Outline application - with all matters reserved (except for principal points of access) for land at Alderbourne Farm to comprise backlots and up to 35,000 sqft (3,252 sqm) of associated film production buildings (workshops) together with access roads and parking;	Approved	28 July 2023

	• Part C - Outline application for 32.6 ha of land at Pinewood South with all matters reserved (except for three principal points of access) to comprise up to 1,365,000sqft (126,817sqm) of film production buildings (to include sound stages, workshops, offices and ancillary uses), education and business hubs with associated ancillary structures together with backlot, multi storey car parks, accesses and green and blue infrastructure.		
PL/25/2076/OA	Outline planning application with all matters reserved, except for the principal points of access from Pinewood Road and Uxbridge Road, to comprise data centre (Use Class B8) of up to 55,030 sq m (592,338 sq ft) GIA of building floorspace, power sub stations, associated plant, emergency back-up generators and associated fuel storage, vehicular and pedestrian access, car and cycle parking, landscaping, sustainable drainage system, other associated works, community garden (including growing space, orchard, informal recreation, learning space and multi-use site hub building of up to 500 sq m GIA) all to be delivered in phases (each phase being a separate and severable part of the development).	Approved	25 February 2026

6.23.4 Even if the approved data centre application is delivered (as opposed to the other schemes relating to the delivery of film studios), it is not capable of meeting the identified level of need within the HAZ. Even with the delivery of the scheme there would still be overwhelming need for data.

6.23.5 The site is not considered to be available, and is therefore not a reasonable alternative for the Development.

6.24 Manor Farm West

6.24.1 The site is within the Green Belt, the Colne Valley Regional Park, a Biodiversity Opportunity Area, and the Strategic Gap as defined in Slough's Proposals Map.

6.24.2 A planning application was valided 07 October 2026 (ref. SMI/2026/31) for:

> *Demolition of existing buildings and structures, and erection of three Data Centres (Use Class B8) 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, site re-levelling, community building, river diversion and other associated works.*

6.24.3 At the time of writing additional information about the application is not available on the Council's website

6.24.4 Owing to the recent planning history, the site is therefore considered not to be available for development, and is not a suitable alternative site.

6.24.5 Even with the delivery of the scheme, there would still be overwhelming need for DCs in the HAZ.

6.25 Land at Denham

6.25.1 The site is approximately 11.37 ha of undeveloped Green Belt land in agricultural use and within the Colne Valley Regional Park

6.25.2 Denham Quarry Park directly to the north and east is designated a Local Nature Reserve and is part of the wider Colne Valley Regional Park. Fray Meadows SSSI is c.700m south-west, and Denham Locks SSSI is c.540m east.

6.25.3 Denham Conservation area lies 280m at its closest point to the north east of the site, and Denham Lock Conservation Area 306m to the east. The site is located within an archaeological notification area, and the South Bucks Air Quality Management Area (AQMA) comprising the M4, M25 and M40.

6.25.4 There is a pending planning application on the site (ref. PL/26/04446/OA, validated 01 June 2026) for:

> *Outline planning application (all matters of detail reserved) for construction of data centre, including ancillary offices, plant and cooling equipment, emergency backup generators. Other works include means of access, internal roads and footpaths, cycle and car parking, hard and soft landscaping, security gatehouses and perimeter fencing, lighting, drainage, pumping station, electricity substation and other associated works and infrastructure.*



Figure 16: Illustrative Masterplan (ref. PL/26/04446/OA)

6.25.5 Even if the proposed data centre scheme were to come forward, it is not capable of meeting the identified level of need within the HAZ. On this basis, the site is not a reasonable alternative for the Development.

6.26 Concluding Comments on Sites

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

6.26.2 Concluding comments for each site other than Manor Farm West (the Application Site) are summarised below.

Site	Comment
Axis, Langley (South of Langley Train Station)	Has permission for DC, and is not considered to be available.
Former Akzo Nobel Site, Slough	Has permission for DC, and is not considered to be available.
Heathrow Distribution Centre	To facilitate redevelopment, vacant possession of the site and relocation of existing occupiers is required. This includes Royal Mail who occupy a largescale distribution centre.
Dromenagh Farm	Has permission for DC, and is not considered to be available.
Thorney Business Park	Has permission for DC, and pending applications for additional DC development. It is not considered to be available.
Western International Market	Unavailable until at least 2034 owing to use for minerals extraction.
Wexham Springs	Heavily constrained by protected trees, and it would not be possible to deliver the data centre element of the Development without requiring significant loss. Site is also in a Conservation Area, and the delivery of a DC is considered to have a significant impact on the character of the Conservation Area.
Former Colnbrook Landfill	Considered to perform more strongly on Green Belt terms, and is not a viable alternative on these grounds to the Application site.
Land South of Hollybush Lane	Proximity to Denham Aerodrome means a threshold height for safeguarding purposes of 10m. The Aerodrome has stated that the maximum acceptable height is 12m. Site is therefore not suitable on grounds of building height.
Phase 4, Stockley Park	Part of Prologis' expansion plans for Stockley Park, and is coming forward for traditional I&L development. It is not considered to be available.
SIFE	Considered to perform more strongly on Green Belt terms, and is not a viable alternative on these grounds to the Application site.
Manor Farm East	Has permission for DC, and is not considered to be available.
Woodlands Park	Has permission for DC, and is not considered to be available.
Land South of Slough Road	Unable to secure two points of access. Site is undeveloped Green Belt site.
Cemex Site, Iver	Unavailable until at least 2029 owing to use for minerals extraction.
Land to the West of Pinewood Road	Has permission for DC, and is not considered to be available.
Manor Farm West	Site has pending application for DC, and is not considered to be available.
Land at Denham	Site has pending application for DC, and is not considered to be available.
Centaurs Business Park	To facilitate redevelopment, vacant possession of the site and relocation of existing occupiers is required. This includes the broadcaster Sky, who are a specialist occupier.

Convent Way	Site is subject to residential-led redevelopment, and is not considered to be available.
Feltham Garrison	Site is subject to residential-led redevelopment, and is not considered to be available.
Former Nestle Factory	Site is subject to residential-led redevelopment, and is not considered to be available.
Greenford Green	Portion of site is subject to residential-led redevelopment, and is not considered to be available. To facilitate redevelopment on the remainder, vacant possession of the site and relocation of existing occupiers is required.
Land at Hatton Fields	Site is allocated for traditional I&L uses, and is not considered to be available. Is also subject to severe constraints owing to proximity of Heathrow runway.

7. Conclusion

7.1 This ASA has been prepared by Savills on behalf of the Appellant, Virtus Data Centres, to support a planning application for a data centre scheme at the Former Sipson Garden Centre.

7.2 Following a robust methodology, the ASA has identified an Area of Search, the minimum site requirements necessary to the scheme, alongside appropriate site suitability criteria when considering the specific locational and physical requirements of cloud or hyperscale DC use. This is considered to be a highly robust approach and has been successful tested at Public Inquiry.

7.3 The ASA exercise applied a series of staged assessments to establish whether any suitable alternative sites exist within the Area of Search. It has been demonstrated that there are no suitable / available alternative sites for the Development. None of the identified sites would be capable of meeting the established level of need for data centres in the HAZ if they were to be delivered as cloud or hyperscale data centres. In addition, it is essential that cloud and hyperscale DCs are in locations such as this (i.e. ones with access to power, fibre, and in proximity of other DCs for resilience).

7.4 It is worth emphasising that the Development has been advanced, in part, on a 'power-led' approach that ensures a connection to the grid by 2030, and without the need to await grid improvements. This means that the Development is able to contribute towards meeting both the level of need and its urgency, unlike the sites identified in this ASA.

7.5 The ultimate conclusion is that the Application Site is that no alternative sites are available to accommodate the Development.

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