
Link Park, West Drayton

Planning Statement

Prepared by Barton Willmore LLP on behalf of Link Park LLP

December 2020

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1.0 INTRODUCTION

- 1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Link Park LLP ('the Applicant'), in relation to an outline planning application for the redevelopment of Link Park, Thorney Mill Road, West Drayton, UB7 7EZ ('the Application Site') for data centre use. The description of development for this application is as follows:

"Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Demolition and redevelopment to comprise a data centre (Use Class B8 (Data Centre) or sui generis (Data Centre) of up to 55,000sqm (GEA) including ancillary offices, internal plant & equipment and substation. In addition to the above the Development may also include: car parking; provision of external plant and equipment and fuel storage; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage and lighting; and for the laying out of the buildings; routes and open spaces within the development; realignment of railhead; all associated and ancillary works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations."

- 1.2 This Planning Statement has assessed the proposed development against the relevant planning policy framework and provides information to support and justify the proposals in planning policy terms and is structured as follows:

- Section 2 – The Application Site and Planning History;
- Section 3 – The Proposed Development;
- Section 4 – Pre-Application Consultation
- Section 5 – Planning Policy Context;
- Section 6 – Assessment of Relevant Planning Issues;
- Section 7 – Green Belt Very Special Circumstances;
- Section 8 – CIL and Planning Obligations Heads of Terms; and
- Section 9 – Conclusion

- 1.3 The planning application comprises the following documents:

- Planning Application Form and certificates (Prepared by Barton Willmore);
- CIL Forms (Prepared by Barton Willmore);
- Design and Access Statement (Prepared by NWA); and
- Drawing Package (Prepared by NWA Architects)
 - Existing Site Plan (Drawing Ref. 0485-A02-100 Rev P02);
 - Parameter Plan (Drawing Ref.0485-A02-111 Rev P05);
 - Indicative Ground Floor Plan (Drawing Ref. 0485-A03-113 RevP01);
 - Indicative DH Floor Plan (Drawing Ref. 0485-A03-114 RevP01);
 - Indicative Site Layout (Drawing Ref. 0485-A02-020 Rev P03); and
 - Adjoining Woodland (Drawing Ref. 0485-A02-120 Rev P02).

1.4 In addition to this planning statement, the following documents are submitted in support of the planning application:

- Cover Letter (Prepared by Barton Willmore);
- Economic Benefits Statement (Prepared by Barton Willmore);
- Health Impact Assessment (Prepared by Barton Willmore);
- Statement of Community Involvement (Prepared by Kanda);
- Transport Assessment (Prepared by Bellamy Roberts);
- Travel Plan (Prepared by Bellamy Roberts);
- Landscape visual Impact Assessment (Prepared by Barton Willmore);
- Flood Risk Assessment / Drainage Strategy (Prepared by Ambient);
- Utilities Statement (Prepared by Hydrock);
- Air Quality Assessment (Prepared by Cundall);
- Noise and Vibration Assessment (Prepared by Cundall);
- Preliminary Risk Assessment (Prepared by Waterman);
- Energy & Sustainability Statement (Prepared by Hydrock);
- BREEAM Assessment (Prepared by Hydrock);
- Outline Site Waste Management Plan (Prepared by Waterman);
- Archaeology Impact Statement (Prepared by Waterman);
- Wind Desk Based Assessment (Prepared by RWDI);
- Ecology Appraisal (Prepared by Waterman);
- Arboricultural Impact Assessment (Prepared by Waterman);
- Crime Prevention Strategy (within Design and Access Statement) (Prepared by NWA);
- Lighting Strategy (within Design and Access Statement) (Prepared by NWA); and
- Aviation Report (Prepared by Osprey).

Submission

- 1.5 The planning application has been submitted to both Buckinghamshire Council (BC) and London Borough of Hillingdon (LBH) as the proposed development site straddles both Council's boundaries. In line with government guidance, where an application site crosses the administrative boundary between two local planning authorities, two identical applications should be submitted, one to each LPA, seeking planning permission for the development of land falling within each LPA administrative area. This application is therefore submitted to both BC and LBH.
- 1.6 The planning fee is payable solely to the authority that contains the larger or largest part of the whole application site. As the majority of the site is within BC's administrative land (with no buildings within LBH), the planning application fee is payable to BC.

EIA Screening

- 1.7 An EIA Screening Report was submitted to the Council on the 17 November 2020 to determine whether the proposed development would constitute EIA development.
- 1.8 The proposed development falls within Schedule 2, 10 (a) of the EIA Regulations, as an industrial estate development project. The site is not located within a sensitive area as defined by the EIA Regulations, and falls just below the indicative threshold of 5ha. With regard to the indicative criteria and threshold identified in the PPG, the proposals fall well below the 20ha threshold at which EIA is more likely to be required.
- 1.9 The proposed development would not lead to effects that are different in nature or complex. It is considered that the principle construction environmental effects would relate to traffic movements and associated noise and air quality emissions, although as set out above, these effects could be managed in accordance with standard methods, implemented through the CEMP. The main residual effects on completion of the development would be informed by a thorough analysis of surrounding context and residual effects are not considered to be significant.
- 1.10 The screening assessment identified that significant effects on the environment are not considered likely either alone or in combination with other development. The proposals would be of a sufficiently limited scale that effects could be managed in

accordance with standard methods. The proposed development is therefore not considered to be formal EIA development as defined by the EIA Regulations.

- 1.11 At the time of submission in December 2020, the Council's Screening Opinion had not been received.

Summary

- 1.12 Outline planning permission is sought for data centre use (Class B8 (Data Centre) / Sui Generis (Data Centre)). A complete package of planning application documents is submitted in respect of the proposal that meets national and local validation requirements.

2.0 THE APPLICATION SITE AND PLANNING HISTORY

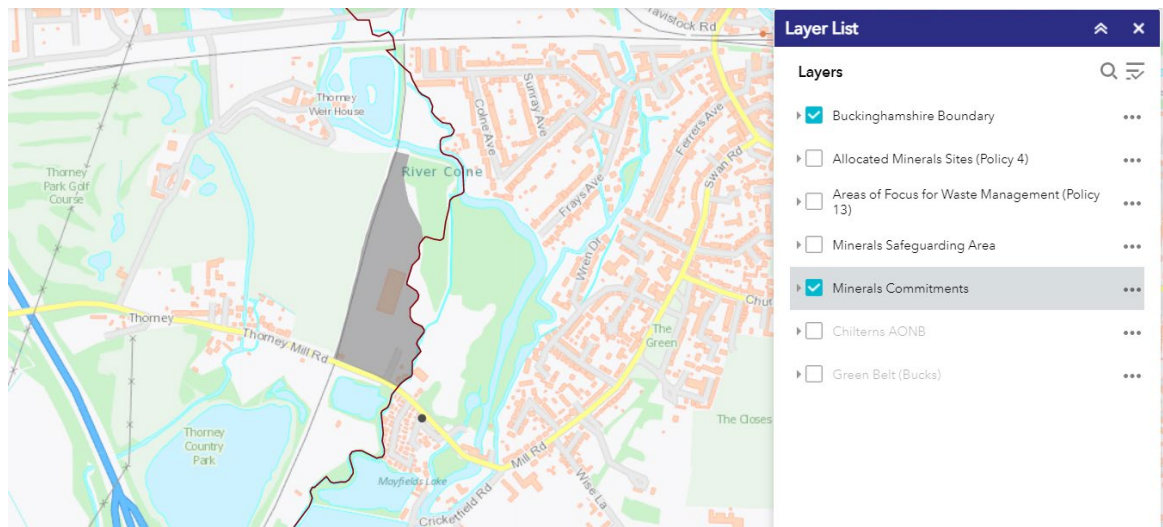
- 2.1 Link Park is located on the north side of Thorney Mill Road, to the west of West Drayton in South Buckinghamshire. The Application Site extends to approximately 4.7ha and is relatively level, however there is a slight dip from west to east and a more pronounced hollow in the south-east corner. It is surrounded by a 2.5m high steel security fence. There is an existing warehouse building as well as 2no. portacabin buildings. There is also a former weighbridge office, former bungalow and electricity substation.
- 2.2 The Application is located within both the jurisdictions of Buckinghamshire Council and the London Borough of Hillingdon Council. The whole of the Application Site is located within the Green Belt. Access to the Application Site is on the south side where there is a sliding security gate.
- 2.3 The western boundary of the Application Site adjoins railway sidings. The sidings are connected to a railway that runs north to West Drayton and the national rail network. The sidings have historically been used for importation of aggregates from other parts of the country. The aggregate operation on the Application Site currently imports asphalt.
- 2.4 To the north and east of the Application Site is a levelled area which is not in use; this area adjoins a copse. A stream, known as Bigley Ditch, runs through the copse and connects to Frays Brook.
- 2.5 To the south east of the Application Site is a yard and buildings occupied by a plant hire company. To the south of the Application Site is Thorney Mill Road and on the other side of the road is Riverside Park, a residential estate.
- 2.6 The nearest railway station is West Drayton and is approximately 1.1miles from the Application Site. The nearest motorway is the M4 and is approximately 1.8miles away. A Site Plan can be found at **Appendix 1**.

Site Allocation

- 2.7 The Application Site has been safeguarded for minerals within the Buckinghamshire Minerals and Waste Local Plan (2019).

- 2.8 Image 1 (below) sets out an extract from the Buckinghamshire's Mineral and Waste Local Plan (2019) Policy Map, which shows the Application Site highlighted in grey, indicating that it is safeguarded for minerals.

Image 1 – Extract from Buckinghamshire Minerals and Waste Policy Map



- 2.9 Policy 1 'Safeguarding Mineral Resources' of the Buckinghamshire Minerals and Waste Local Plan states:

"Minerals are a finite natural resource; in order to secure their long-term conservation Mineral Safeguarding Areas (MSAs) have been defined within Buckinghamshire to prevent mineral resources of local and national importance from being needlessly sterilised by non-minerals development."

- 2.10 As shown on the Buckinghamshire Planning Policies Map, the Application Site is safeguarded as an Aggregate Rail Depot Site. Image 2 below sets out an extract from the Buckinghamshire Local Plan Policies Map.

Image 2 – Extract from Buckinghamshire's Planning Policy Map (2011)

- 2.11 Further to this, Appendix 1f 'Rail Aggregate Deposits' of the Buckinghamshire Mineral and Waste Local Plan states that the Application Site is also a Rail Aggregate Depots. This is shown in Image 3 below.

Image 3 – Extract from Buckinghamshire's Mineral and Waste Local Plan (2019)**Appendix 1f: Rail aggregate depots**

Site	Permission reference	Grid reference	
		Easting	Northing
Thorney Mill, Iwer		505160	179540

- 2.12 Within the Buckinghamshire Minerals and Waste Core Strategy (2012), the Application Site is allocated under Policy CS7 'Safeguarding of Rail Aggregates Depots and Wharf Facilities'.

- 2.13 Policy CS7 'Rail Aggregate Depots and Wharf Facilities' of the Buckinghamshire's Minerals and Waste Core Strategy (2012) states:

"The Council will safeguard the existing rail aggregates depot site at Thorney Mill, Iver but will seek to ensure that applications for development or redevelopment will result in a reduction (from a baseline at 2012) in HGV movements entering and existing the site. The County Council will also safeguard the former aggregate rail siding at Griffin Lane, Aylesbury. Where planning permission is granted for a new rail aggregate depots, those sites will also be safeguarded so as not to prejudice the permitted use."

Planning History

- 2.14 In 1981 Buckinghamshire County Council granted two planning permissions at the Application Site (SBD/1111/79 and SBD/1112/79). The first permission was for the reception and storage under cover railborne aggregates for use in the creation of coated roadstone. The second permission was for the retention of buildings in use for the processing of those aggregates to form coated roadstone. The first permission extended over most of the Application Site and the second related to an area to the south west corner of the Application Site. Those permissions were subject to a planning condition relating to the hours of use but there was no restriction on the number of HGV's coming to or leaving the Application Site; nor was there any restriction on the routing which those vehicles should observe when passing through the neighbouring area.
- 2.15 In September 2019 South Buckinghamshire District Council resolved to grant permission for use as open storage of that part of the Application Site which fell within their jurisdiction (ref.17/02353/FUL). The resolution is subject to the completion of S106 Agreement relating inter-alia to the number and routeing of HGV's.
- 2.16 In May 2020 London Borough of Hillingdon granted certificates of lawfulness for the small part of the Application Site on the east side which lies within their area. The certificates relate to use of the land as storage and the retention of a security fence along the boundary of the Application Site (ref.73420/APP/2020/1076).

- 2.17 It should be noted that the applicants have not yet signed the S106 agreement relating to application ref.17/02353.

Summary

- 2.18 The Application site has a number of existing buildings on site including a warehouse, cottages and portacabins. The Application Site is located within the Green Belt and is currently within Industrial Use (Class B2 and B8). The Application Site has a history of industrial uses on site.

3.0 THE PROPOSED DEVELOPMENT

3.1 This section provides an overview of the proposed development. The supporting Design and Access Statement and Landscape Visual Impact Assessment should be read in addition to this Planning Statement as these documents provide a more detailed description of the scheme and the Application Site's setting.

3.2 The description of development is as follows:

"Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Demolition and redevelopment to comprise a data centre (Use Class B8 (Data Centre) or sui generis (Data Centre) of up to 55,000sqm (GEA) including ancillary offices, internal plant & equipment and substation. In addition to the above the Development may also include: car parking; provision of external plant and equipment and fuel storage; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage and lighting; and for the laying out of the buildings; routes and open spaces within the development; realignment of railhead; all associated and ancillary works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations."

3.3 It is proposed that the existing buildings on the Application Site will be demolished to allow for the development for data centre uses, with ancillary office and plant comprising a maximum of approximately 55,000sqm (GIA) of floorspace and up to 25m in height. There will be a maximum of 90 car parking spaces on site.

3.4 An illustrative masterplan (Drawing Ref. 0485-A02-020) accompanies the outline planning application to demonstrate one way, but not the only way, a development parameter compliant scheme could come forward at reserved matters stage. The illustrative scheme breakdown is as follows:

- Up to 55,000sqm of built development;
- Up to 25m in height;

- A Data centre, housed in two buildings to reflect the site constraints, which include offices, meeting rooms, kitchen toilets, cleaners' cupboards:
- Loading bays; and
- Up to 90 parking spaces.

Data Centres

- 3.5 A data centre is a secure facility that houses IT infrastructure, such as networked computers and data storage. Within a data centre, storage systems, switches, and other components that make up large IT networks are often found.
- 3.6 The main purpose of a data centre is to store and process data. This can take many forms. For example, data can be stored and backed up, data centres can perform the role of transmitting traffic between the servers into the outside world via Internet connections, or house mission critical apparatus in order to keep a company operational in an event of failure elsewhere. Data centres are essentially bigger versions of the individual "IT rooms" often found in company offices, that have been amalgamated into specialist premises dedicated to serve that function for multiple companies.
- 3.7 Data Centres are used by many parts of the present and future economy. This includes activities such as: banking; social media; emails; website hosting; collecting and storing information; online shopping; cloud storage; research; gaming; searches; navigation; healthcare; education; leisure and defence. A data centre comprises server racks; power distribution units; cooling units; back-up batteries; back-up generators; electrical rooms; command rooms; office and security spaces. Data centres use large amounts of power and need to be connected to the internet. Locations close to power stations and fibre optic data cable network are key.
- 3.8 The UK is Europe's premier data centre hosting country. It is clearly very important for the UK to maintain its dominant profile and track record of attracting global investment in the period of uncertainty as the UK leaves the European Union and establishing its new position in the global economy. Maintaining and increasing data centre facilities is therefore an important part of the UK Plc business investment strategy of the future, as the economy changes and data demand increases exponentially. Data centres are part of the UK's strategic infrastructure.

- 3.9 The demand and importance of data centres has been further highlighted with the on-going importance of data handling for business and socially through the COVID-19 lockdown. Commentators suggest that COVID-19 will change working practices permanently after the lockdown and data handling will therefore become even more important than it otherwise was.
- 3.10 For locations to be viable for data centre operators they need to meet the minimum requirements:
- Power – needs to be close to a high-capacity power station;
 - Fibre – needs to be near the fibre optic power cable network;
 - Security – cannot be in a location where security might be compromised;
 - Disaster – cannot be in a location where a disaster might compromise the facility (e.g., gas or petrol explosion, train or air crash); and
 - Flooding – cannot be in the flood plain or close to a river or sea.
- 3.11 The London Data Centre market is the second largest globally. In Europe, London dominates but other data centre concentrations are focused in Frankfurt, Amsterdam and Paris.
- 3.12 Within the UK, the Hayes to Slough Golden Corridor is critical. The traditional data centre capital of Slough is now reaching maximum capacity. In light of Buckinghamshire's location, it has the potential to become a key future data centre cluster to cater for the growth in the data centre economy that can no longer be accommodated in Slough and reap the rewards on offer. Within Buckinghamshire, the corridor running alongside the M4/Grand Union Canal and in the vicinity of the Iver power station provides the ideal focus for the new data centre cluster. Link Park lies at the centre of this corridor and therefore represents a highly sought after and important potential data centre site. The known demand for data centres is at least 7-8 sites and means if Buckinghamshire is to take advantage of the data centre economy then it will need to find sites. As previously noted, Link Park is one of the best locations in Buckinghamshire to deliver a data centre use.
- 3.13 As set out in this Statement, the application site is a prime location with the required attributes for data centre use.

Summary

- 3.14 The proposed development is for the redevelopment of the Application to provide data centre including ancillary office and plant. The data centre will be up to 55,000sqm and a maximum of 25m in height.
- 3.15 The Application Site is located within a prime location – within the golden triangle for Data Centres.

4.0 PRE-APPLICATION CONSULTATION

- 4.1 This section sets out the pre-application consultation processes that have been undertaken prior to the submission of the planning application.
- 4.2 The National Planning Policy Framework (NPPF) (2019) advocates the need for Local Planning Authorities to approach decision making in a positive way and look for solutions to approve applications for sustainable development where possible (Paragraph 30-50). Key to this pre-application engagement and front loading issues, with good quality discussions enabling better co-ordination between public and private resources and improved outcomes for the community (Paragraph 39).
- 4.3 The planning application proposals have been the subject of extensive pre-application discussions with Buckinghamshire Council and engagement with the local community and stakeholders.
- 4.4 The Applicant has engaged with Buckinghamshire Council as well as LB Hillingdon at pre-application stage with several meetings being held on 23 March 2020; 12 June 2020; 17 September 2020; 8 October 2020; and 22 October 2020. At the time of submission in December 2020, the pre-application response had not been received.

Statement of Community Involvement

- 4.5 The Applicant has held a virtual public consultation event with the community prior to the submission of the planning application.
- 4.6 The consultation process began in May 2020 and sought to engage with local businesses, residents and the wider community.
- 4.7 The consultation process was carried out in conjunction with pre-application meetings with planning officers at Buckinghamshire Council and correspondence with Hillingdon Council. The activities undertaken as part of the consultation process have included:
- Emails sent to local political and community stakeholders asking for a meeting, on various dates.
 - Meetings held with:
 - Buckinghamshire Local Enterprise Partnership, on 10th June 2020

- Iver Parish Council Councillors, on 6th July 2020 and 15th September 2020.
- Iver Ward Councillors, on 13th July 2020
- West Drayton Ward Councillors, on 22nd July 2020
- Joy Morrissey MP, on 8th October 2020
- Richings Park Residents' Association, on 15th October 2020
- Bucks Business First, on 23rd October 2020
- A booklet, outlining the proposals and encouraging feedback, delivered to 4392 addresses near to the site on 3rd August 2020
- An A5 flyer, advertising the second round of consultation, delivered to 4392 addresses near to the site on 3rd December 2020
- A newspaper advert in the Bucks Free Press and the Slough and South Bucks Observer, both print and online, beginning on 11th December 2020.
- Social media advertising directing residents to the consultation website, running from 3rd December to 14th December 2020

4.8 A booklet, outlining the proposals and encouraging feedback, delivered to 4,392 addresses near to the Application Site, was delivered on 3 August 2020.

4.9 A flyer advertising the second round of consultation, delivered to 4,392 addresses near to the Application Site, was delivered on 3 December 2020.

4.10 A newspaper advert in the Bucks Free Press and the Slough and South Bucks Observer both print and online was issued on 11 December 2020.

4.11 Online advertising directing residents to the consultation website ran from the 3 December until the 14 December 2020. The adverts reached 8,632 people 43,574 times and led to 317 click throughs on website.

4.12 In order to comply with the Government's regulations due to the COVID-19 pandemic, the Applicant took the decision to run the consultation process virtually. This primarily consisted of a consultation website (www.linkparkheathrow.com).

4.13 The level of detail in which the proposals were discussed was equivalent to that which would have been displayed on boards at public exhibition and the at-a-distance consultation gave the equivalent, if not superior opportunity for respondents to feed back their views through a series of questions and comment boxes. Residents were directed to this website in order to view the plans and give their feedback.

4.14 Two rounds of consultation took place.

First Round of Consultation (30 July – 2 December 2020)

4.15 During the first round of consultation, the consultation website was visited by 277 individual users a total of 401 times. From these visits, 10 virtual feedback forms were completed.

Second Round of Consultation (3 December – 14 December 2020)

4.16 During the second round of consultation, the consultation website was visited by 720 individual users a total of 828 times. From these visits, 19 virtual feedback forms were completed. 8 emails were also received to the dedicated project email address.

4.17 Through the consultation process, a dedicated project telephone number and email address were provided and managed by Kanda, to supply further information to residents, businesses and stakeholders on request.

4.18 The applicant has sought input from a wide range of residents and stakeholders on the proposals and has carefully considered their responses. The feedback from respondents about the proposals has been overwhelming positive.

4.19 The change was welcomed by residents, with the elimination of the vast majority of HGV movements currently generated from the site particularly referenced as of benefit to the wider area.

4.20 Respondents recognise the importance of data centres to the UK economy, and the potential economic benefits that a data centre on the Application Site could bring, including jobs, both direct and indirect, and firms relocating to the area.

4.21 A number of respondents raised issues relating to the environment, with the potential for the gifting of high-value woodland within the site viewed positively, and several respondents commenting that the energy use of a data centre on the site should use renewable energy.

- 4.22 Several respondents raised questions about the scheme, including one of the noise generated by the Application Site, the amount of traffic generated by a data centre use and one mentioning the potential impact on local views.

Summary

- 4.23 The Applicant has undertaken extensive pre-application consultation and will continue to engage with Buckinghamshire Council, Statutory Consultees, key stakeholders and the general public throughout the determination period of the planning application.
- 4.24 Further details of the consultation undertaken can be found in the Statement of Community Involvement which has been submitted in support of this application.

5.0 PLANNING POLICY CONTEXT

5.1 This section sets out the planning policies that are relevant in considering the acceptability of the development proposals.

5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that applications must be determined in accordance with the relevant development plan, unless material considerations indicate otherwise. The planning application proposals will therefore need to be considered against the relevant development plan policy and other material considerations.

Development Plan

5.3 The Development Plan for Buckinghamshire Council comprises:

- South Buckinghamshire Adopted Local Plan (1999);
- South Buckinghamshire Adopted Core Strategy (2011); and
- South Buckinghamshire Minerals and Waste Local Plan (2019).

5.4 The Development Plan for LB Hillingdon comprises:

- The London Plan (2016) (as amended);
- The Hillingdon Local Plan: Part 1 – Strategic Policies (2012);
- The Hillingdon Local Plan: Part 2 – Development Management Policies (2019); and
- The Hillingdon Local Plan: Part 2 – Site Allocations and Designations (2019).

5.5 The scheme has been assessed against policies contained within the NPPF, Local and Regional planning policies within Section 6 of this Statement.

Material Considerations

5.6 At the time of submission of the planning application in December 2020, there are a number of other documents that are material to the determination of the planning application.

5.7 National Documents:

- National Planning Policy Framework (NPPF) (2019);
- National Planning Practice Guidance (2014);

5.8 Regional Documents:

- The London Plan (Intend to Publish) (2019);
- The Mayor of London's Sustainable Design and Construction SPG (April 2014);
- The Mayor of London's Energy Planning Guidance (April 2020);
- The Mayor of London's Planning for Equity and Diversity in London SPG (October 2007);

5.9 Local Documents:

5.10 There are no relevant SPGs in Buckinghamshire Council. The relevant SPGs for LB Hillingdon are as follows:

- LBH Air Quality SPG (May 2002);
- LBH Community Safety (May 2002);
- LBH noise SPD (April 2006);
- LBH Land Contamination SPG (January 2014); and
- LBH Planning Obligations SPD (July 2014).

5.11 Other Supplementary Planning Guidance / Documents and design related guidance may also be relevant and have been considered by the project architects and consultant team. Where relevant, there have been specifically referred to in the supporting documents submitted with this planning application.

National Planning Policy Framework (2019)

5.12 The National Planning Policy Framework (NPPF) (2019) is a material consideration in the determination of planning application (Paragraph 2) and advises that the Framework should be read as a whole at Paragraph 3.

5.13 The NPPF (2019) confirms that it is the purpose of the planning system is to contribute to the achievement of sustainable development of which there are three inter-related dimensions of which are identified as economic, social and environmental (Paragraph 8). These dimensions give rise to the need for the planning system to perform a number of roles: an economic role – contributing to building a strong, responsive and competitive economy; a social role – supporting strong, vibrant and healthy communities; and an environmental role – contributing to protecting and enhancing our natural, built and historic environment.

5.14 Paragraph 10 notes that “at the heart of the Framework is a presumption in favour of sustainable development” which is expanded upon in Paragraph 11 and confirms that for decision-taking this means:

- *“Approving development proposals that accord with an up-to-date development plan without delay; or*
- *Where there are no relevant development plan policies, or the policies are which are the most important for determining the application are out of date, granting permission unless:*
 - i. The application of policies in this framework that protect areas of assets of particular importance provide a clear reason for refusing the development proposed; or*
 - ii. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

5.15 Paragraph 80 states:

“Planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to

build on its strengths, counter any weaknesses and address the challenges of the future."

5.16 Paragraph 143 of the NPPF (2019) states:

"Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances."

5.17 Paragraph 144 of the NPPF (2019) states:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations"

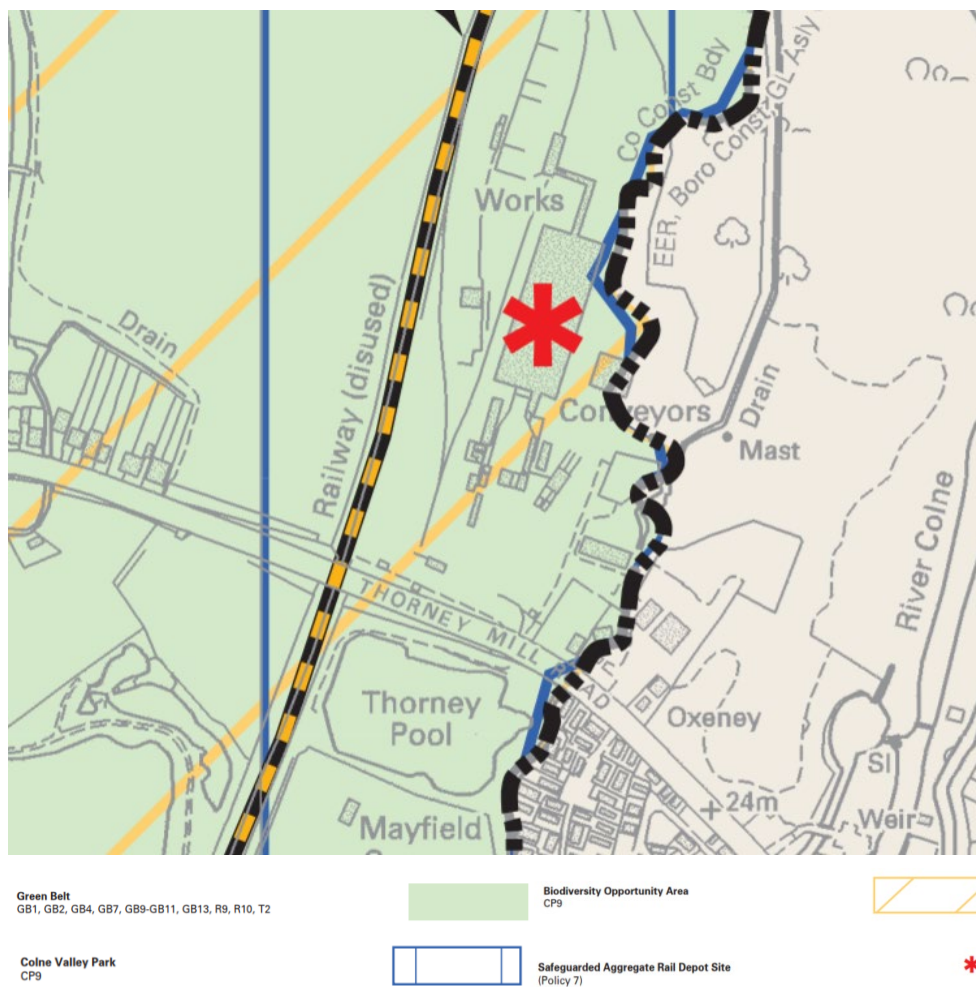
5.18 Paragraph 127 of the NPPF (2019) indicates that planning decisions should ensure that developments create places that are safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users.

Relevant Planning Policy and Waste and Minerals Policy

Buckinghamshire Council

5.19 The Buckinghamshire Planning Policies Map (2011) shows that the Application Site is located within the Green Belt and the Colne Valley Park. The Application Site is also a Safeguarded Aggregate Rail Depot Site and a Biodiversity Opportunity Area. An extract of the Policies Map is set as Image 4 below.

Image 4 – Extract from the Buckinghamshire's Planning Policies Map



South Bucks District Local Plan (1999)

5.20 Policy GB1 'Green Belt Boundaries and the Control Over Development in the Green Belt' states:

"The area in which Green Belt policies will be applied is defined on the Proposals Map.

Within the Green Belt, planning permission will not be granted for development other than for the change of use of existing buildings or land or the construction of new buildings or extensions to existing buildings as set out below:-

(a) Development for agriculture or forestry

- (b) Essential facilities for outdoor sport, outdoor recreation or outdoor leisure, in accordance with the policies in Chapter 7 of this Plan;*
- (c) Mineral working and subsequent restoration of the land, in accordance with the policies in the Buckinghamshire Replacement Minerals Local Plan;*
- (d) Cemeteries;*
- (e) Limited extension, alteration or replacement of existing dwellings, in accordance with Policies GB10 and GB11 of this Plan;*
- (f) Limited infilling in existing villages, in accordance with Policy GB3 of this Plan;*
- (g) Other uses of land and essential facilities for them which would not compromise the purposes of including land in the Green Belt and which would permanently retain its open and undeveloped character;*
- (h) The re-use of buildings of permanent and substantial construction in accordance with policy GB2.*

Development falling into the categories above will only be permitted where:-

- (i) the proposal would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and would be in accordance with EP3 (Use, Design and Layout of Development); and*
- (ii) the scale, height, layout, siting, form, design and materials of any new building would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and the proposal would be in accordance with Policy EP3; and*

- (iii) proposals for extensions to existing buildings would harmonise with the scale, height, form and design of the original building; and*
- (iv) the proposal would comply with all other relevant policies in this Plan."*

5.21 Policy GB4 'Employment Generating and Commercial Development in the Green belt (Excluding Green belt Settlements) states:

"Proposals to establish new employment generating or other commercial sites or extend the curtilages of existing sites will not be permitted in the Green Belt. Where the proposal involves the re-use of buildings in the Green Belt new employment generating development may be acceptable subject to the provisions of Policy GB2 (Re-use of Buildings in the Green Belt).

Extensions or additional buildings for existing employment generating or other commercial development will not be permitted in the Green Belt, unless, in the case of extensions, they are in connection with the re-use of buildings subject to Policy GB2 (Re-use of Buildings in the Green Belt).

The change of use of employment generating or other commercial premises will only be permitted in the Green Belt in accordance with Policy GB2 and where:-

- (a) the proposal would be for another employment generating use; and*
- (b) the proposal would be compatible with, and would not adversely affect the character or amenities of the Green Belt, of nearby properties or the locality in general, and would be in accordance with policy EP3 (Use, Design and Layout of Development) and;*
- (c) the proposal would comply with all the other policies in this plan. Particular attention is drawn to policies TR5 (Accesses, Highway Works and Traffic Generation), TR7 (Parking Provision)."*

5.22 Policy EP3 'The Use, Design and Layout of Development' states:

"Development will only be permitted where its scale, layout, siting, height, design, external materials and use are compatible with the character and amenities of the site itself, adjoining development and the locality in general. Poor designs which are out of scale or character with their surroundings will not be permitted."

In assessing proposals, the Council will have regard to:-

(a) Scale of Development

Development should be in scale with surrounding development, including any buildings which are to be retained on the site, and should not adversely affect the character or amenities of any nearby properties or the locality in general. The retention and provision of space between buildings should respect the scale of spaces in the locality.

(b) Layout of Development and Siting of Buildings

The layout of development and the siting of buildings should make positive use of the intrinsic qualities and features of the site including its topography, landscaping, water features, and views into or out of the site. The siting of buildings should not adversely affect the character or amenities of any nearby properties or the locality in general. The layout should not be dominated by large areas set aside for parking, servicing or access, and where extensive space is required for such activities, it should be subdivided by landscaping. The layout of new development should, where possible, create attractive groupings of buildings and spaces between buildings.

(c) Height of Development

The height of new development should respect the height of surrounding development, including any buildings on the site

which are to be retained, and the height of buildings in the locality generally. Proposed extensions to existing buildings should reflect the height of those buildings.

(d) Building Form, Design and Fenestration

Buildings should be of a form and design which would respect and harmonise with surrounding properties, including any buildings on the site which are to be retained, and with buildings in the locality in general. Proposed extensions to existing buildings should reflect the form and design of those buildings. The fenestration of extensions to existing buildings should respect the fenestration of those existing buildings. The fenestration of buildings should safeguard against the loss of privacy to residential properties by reason of overlooking.

(e) Materials

The external materials to be used in new developments should be of a type and quality which harmonise with the materials of surrounding development including any existing buildings on the site which are to be retained. Where an existing building is to be extended, the extension should usually be constructed in materials to match the existing building as closely as possible.

(f) Use of Land and Buildings

The use of land and buildings should be compatible with the uses of adjacent land and buildings and with the character and amenities of the locality in general. Permission will not be granted for uses which would be, or which would have the potential to be, detrimental to the character and amenities of nearby properties or the locality in general by reason of noise, vibration, smell, pollution, disturbance, visual intrusion, loss of privacy, the impact of traffic, or other nuisance.

The scale of a proposed use should be compatible with and not adversely affect the character or amenities of neighbouring properties or the locality in general.

Where permission is granted, conditions may be imposed in order to minimise to an acceptable level the impact on adjacent uses."

South Bucks Core Strategy (2011)

5.23 Core Policy 10 'Employment' states:

"There will be a general presumption that other employment sites (B Use Class) will also be retained in employment use (B Use Class). In limited circumstances, including where there is no reasonable prospect of a site being used for the permitted purpose, or where the site is creating significant amenity issues, the priority will be for the site or premises to be reused or redeveloped (where appropriate) for an alternative economic use (i.e. a use which provides employment opportunities, generates wealth or produces an economic output or product).

The Council will seek to increase the presence of high value and knowledge based businesses in South Bucks. Support will be given to small-scale and start-up businesses, by promoting and supporting home-working (where there is no adverse impact on residential amenity) and encouraging the provision of managed workspace. The Council will also support rural diversification schemes, providing they benefit the local community."

5.24 Core Policy 12 'Sustainable Energy' states:

"The Council will promote and encourage energy efficiency and renewable / low carbon energy in all new development through a range of measures in order to contribute towards meeting national targets for reducing CO2 emissions. These will include the following:

- *Requiring that all developments of 10 or more dwellings and 1,000sqm or more non-residential floor space secure at least 10% of their energy from decentralised and renewable or low-carbon sources, unless demonstrated that it is not viable or feasible.*
- *In addition, requiring developers of the Opportunity Sites and other significant sites (as defined in the supporting text to Core Policy 17) to incorporate decentralised and renewable or low carbon technologies into their schemes, unless demonstrated that it is not viable or feasible."*

5.25 Core Policy 13 'Environmental and Resource Management' states:

"The Council will seek to ensure the prudent and sustainable management of the District's environmental resources by:

- *Promoting best practice in sustainable design and construction. All new development must be water efficient and incorporate Sustainable Drainage Systems (SuDs) where feasible. All new residential development should achieve a minimum water efficiency target of 105 litres per person per day.*
- *Protecting and enhancing water quality and encouraging the remediation of land affected by contamination to bring it back to beneficial use. Particular regard should be had to maintaining the integrity of Burnham Beeches SAC.*
- *Seeking improvements in air quality, especially in the Air Quality Management Area adjacent to the motorways and close to Burnham Beeches SAC.*

New development will be directed away from existing sources of noise and air pollution to avoid adverse impacts on local communities. The Council will work closely with other local authorities to minimise aircraft noise from Heathrow Airport.

Vulnerable development will be steered away from areas at risk of flooding wherever possible, in accordance with PPS25."

Buckinghamshire's Mineral and Waste Local Plan (2019)

- 5.26 Policy 27 'Minimising Land Use Conflict' of the Minerals and Waste Local Plan (2019) states:

"Proposals for new development within 300 metres of minerals and waste development (permitted or allocated) and 400 metres of sewage treatment works must demonstrate that it would not adversely affect the continued operation of, or prevent or prejudice the use of, the permitted or allocated land use. Proposals should include a site-specific assessment that identifies the following:

- *The compatibility and nature of both the proposed development and the minerals and/or waste development, with regard to the duration of the development(s) and construction and/or operational phasing.*
- *Any potentially adverse impacts that may result, either now or in the future, from ongoing occupation and usage (of the proposed development). Where relating to sewage treatment works and involving buildings that would normally be occupied, the proposal should be accompanied by an odour assessment report and must consider existing odour emissions of the waste water treatment works at different times of the year and in a range of different weather conditions.*

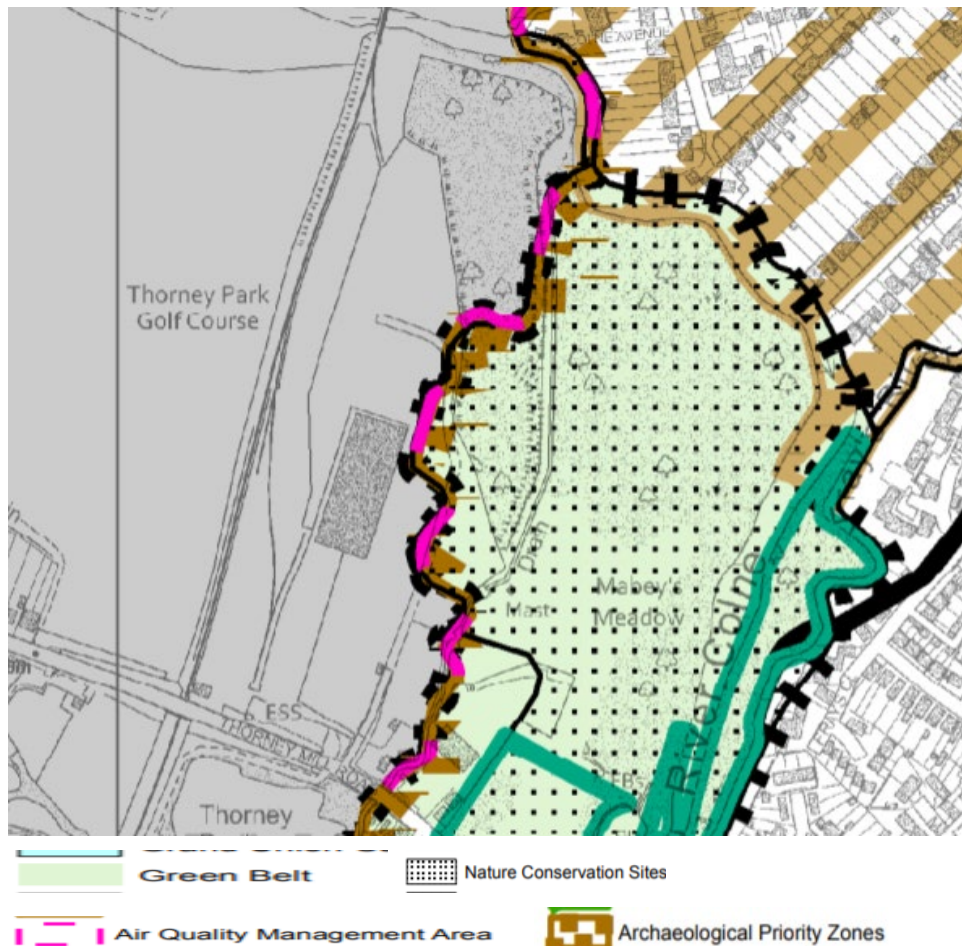
Appropriate mitigation measures considered necessary to avoid and/or minimise potentially adverse effects to an acceptable level and a schedule for their implementation."

London Borough of Hillingdon

- 5.27 The LB Hillingdon Planning Policies Map (2020) shows that the part of the Application within Hillingdon is located with the Green Belt as well as an Air Quality

Management Area; Nature Conservation Area and Archaeology Priority Zone. An extract of the policies map is set out below as **Image 5**.

Image 5 – Extract from LB Hillingdon Planning Policies Map (2020)



Local Plan Part 1: Strategic Policies (2012)

5.28 Policy EM2 'Green belt, Metropolitan Open Land and Green Chains' states:

"The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies."

Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain."

Local Plan Part 2: Development Management Plan

5.29 Policy DMEI2 'Reducing Carbon Emissions'

- "A) All developments are required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.***
- B) All major development⁷ proposals must be accompanied by an energy assessment showing how these reductions will be achieved.***
- C) Proposals that fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets for carbon emissions cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall."***

5.30 Policy DMEI3 'Decentralised Energy' states:

- "A) All major developments are required to be designed to be able to connect to a Decentralised Energy Network (DEN).**
- B) Major developments located within 500 metres of an existing DEN, and minor new-build developments located within 100 metres, will be required to connect to that network, including provision of the means to connect to that network and a reasonable financial contribution to the connection charge, unless a feasibility assessment demonstrates that connection is not reasonably possible.**
- C) Major developments located within 500 metres of a planned future DEN, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be required to provide a means to connect to that network and developers shall provide a reasonable financial contribution for the future cost of connection and a commitment to connect via a legal agreement or contract, unless a feasibility assessment demonstrates that connection is not reasonably possible.**
- D) The Council will support the development of DENs and energy centres in principle, subject to meeting the wider policy requirements of this plan and in particular on design and air quality."**

5.31 Policy DMEI4 'Development in the Green Belt or on Metropolitan Open Land' states:

- A) Inappropriate development in the Green Belt and Metropolitan Open Land will not be permitted unless there are very special circumstances.**
- B) Extensions and redevelopment on sites in the Green Belt and Metropolitan Open Land will be permitted only where the proposal would not have a greater impact on the openness of the Green Belt and Metropolitan Open Land, and the purposes of including land within it, than the existing development, having regard to:**

- i) the height and bulk of the existing building on the site;*
- ii) the proportion of the site that is already developed;*
- iii) the footprint, distribution and character of the existing buildings on the site;*
- iv) the relationship of the proposal with any development on the site that is to be retained; and*
- v) the visual amenity and character of the Green Belt and Metropolitan Open Land."*

5.32 Policy DMEI14 'Air Quality' states:

- "A) Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.*
- B) Development proposals should, as a minimum:*
 - i) be at least "air quality neutral";*
 - ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and*
 - iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area."*

London Plan (2016)

5.33 Policy 5.2 'Minimising Carbon Dioxide Emissions' states:

- "A Development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the following energy hierarchy:*
- 1 Be lean: use less energy*
- 2 Be clean: supply energy efficiently*

3 *Be green: use renewable energy*

B *The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019.*

5.34 Policy 7.16 'Green Belt' states:

"The Mayor strongly supports the current extent of London's Green Belt, its extension in appropriate circumstances and its protection from inappropriate development.

The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance."

Emerging London Plan (Intend to Publish) (2019)

5.35 Policy GG2 'Making the Best Use of Land' states:

"To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- A. *enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites***
- B. *prioritise sites which are well-connected by existing or planned public transport***

- C. proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*
- D. applying a design-led approach to determine the optimum development capacity of sites*
- E. understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character*
- F. protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible.*
- G. plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth*
- H. maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance."*

5.36 Policy GG5 'Growing a Good Economy' states:

"To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

- A. promote the strength and potential of the wider city region*

- B. seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London*
- C. plan for sufficient employment and industrial space in the right locations to support economic development and regeneration*
- D. ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth.*
- E. ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning*
- F. promote and support London's rich heritage and cultural assets, and its role as a 24-hour city*
- G. make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity*
- H. recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success."*

5.37 Policy E8 'Sector Growth Opportunities and Clusters' states:

- "A. Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.*
- B. London's global leadership in tech across all sectors should be maximised.*
- C. The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:*
 - 1) start-up, incubation and accelerator space for micro, small and medium-sized enterprises*
 - 2) flexible workspace such as co-working space and serviced offices*

- 3) *conventional space for expanding businesses to grow or move on*
 - 4) *laboratory space and theatre, television and film studio capacity*
 - 5) *affordable workspace in defined circumstances (see Policy E3 Affordable workspace).*
- D. *Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and other relevant research and innovation organisations should be encouraged.*
- E. *London's higher and further education providers and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.*
- F. *Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.*
- G. *In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:*
- 1) *encouraging local innovation to identify and enhance distinct economic strengths*
 - 2) *co-ordinating infrastructure investment*
 - 3) *creating a distinct and attractive business offer and public realm*
 - 4) *ensuring that development complements the growth of town centres and other business*

locations, and supports the environmental and transport objectives of this Plan

- 5) bringing forward development capacity*
- 6) improving Londoners' access to employment opportunities.*

H. Boroughs are encouraged to identify and support the growth of sustainably-located employment clusters in inner and outer London."

5.38 Policy G2 'London's Green Belt' states:

"A. The Green Belt should be protected from inappropriate development:

- 1) development proposals that would harm the Green Belt should be refused*
- 2) the enhancement of the Green Belt to provide appropriate multifunctional beneficial uses for Londoners should be supported.*

B. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported."

5.39 Policy SI2 'Minimising Greenhouse Gas Emissions' states:

"A. Major development should be net zero-carbon.¹⁵⁵ This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation*
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly*

- 3) *be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site*
 - 4) *be seen: monitor, verify and report on energy performance.*
- B.** *Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.*
- C.** *A minimum on-site reduction of at least 35 per cent beyond Building Regulations¹⁵⁶ is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:*
- 1) *through a cash in lieu contribution to the borough's carbon offset fund, or*
 - 2) *off-site provided that an alternative proposal is identified and delivery is certain.*
- D.** *Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.*
- E.** *Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.*
- F.** *Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon*

Assessment and demonstrate actions taken to reduce life-cycle carbon emissions."

Other Material Consideration

National Planning Practice Guidance

- 5.40 National Planning Practice Guidance (NPPG) expands upon the guidance within the NPPF (2019).
- 5.41 In relation to Green Belt, the following is of relevance (Paragraph 001 Reference ID 64-001-20190722) (Revision Date 22/07/2019):

"Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- *Openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- *The duration of the development, and its irremediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- *The degree of activity likely to be generated, such as traffic generation."*

Summary

- 5.42 The planning policy framework identified above, provides the basis to determine the Proposed Development against the statutory development plan and other material considerations.

6.0 ASSESSMENT OF RELEVANT PLANNING ISSUES

- 6.1 This Section sets out how the Proposed development complies with the relevant national, regional, and local planning policy identified in Section 5.

Principle of Development

- 6.2 The general theme of national, regional and local planning policy is to secure sustainable development and regeneration through the efficient re-use of previously developed land.
- 6.3 With regard to Policy 27 of the Minerals and Waste Local Plan (2019), the railhead will be re-configured as part of the scheme and ensure its continued use by the aggregate industry and Network Rail.
- 6.4 The importance of data centres in this location is a critical national consideration that carries very significant weight as a material consideration, and on balance outweighs the harm caused through reconfiguring the railhead and allowing an increase in built development in the greenbelt.
- 6.5 Currently, the data centre sector believes there is a general over reliance on Hayes (8 data centres dotted around Stockley Park and Bulls Bridge Road) and more so on Slough (19 Data centres within one industrial estate). As such, the market is focussing its efforts on creating a new prime data centre market, ideally within touching distance of both the established core markets, which the government considers (data centre capacity) as critical infrastructure for UK Plc.
- 6.6 The Application Site is enviably located within London's most sought after data centre location (Slough to Hayes corridor). The driver for the demand within this area is the proximity to existing Hyperscale Cloud facilities located at the Slough Trading Estate and Stockley Park. The locations allow a viable site in this locality to act as a genuine campus expansion, extinguishing the need to create a new Cloud Zone.

- 6.7 The Application Site is exactly 6km due south of the Laleham (275KV National Grid owned substation). Data Centre operators seek sites which offer the ability to secure power directly from National Grid 275KV facilities as the assumption is that one should never lose power, and if this substation were to go down, then half of west London would lose power too.
- 6.8 It is worth noting that the 275KV National Grid high voltage lines that run along the southern boundary of the Application Site which provides a feasible and non-disruptive power procurement strategy.
- 6.9 As noted above, within the UK, the Hayes to Slough Golden Corridor is critical. The traditional data centre capital of Slough is now reaching maximum capacity. In light of Buckinghamshire's location, it has the potential to become a key future data centre cluster to cater for the growth in the data centre economy that can no longer be accommodated in Slough and reap the rewards on offer. Within Buckinghamshire, the corridor running alongside the M4/Grand Union Canal and in the vicinity of the Iver power station provides the ideal focus for the new data centre cluster. Link Park lies at the centre of this corridor and therefore represents a highly sought after and import potential data centre site. The known demand for data centre is at least 7-8 sites and means if Buckinghamshire is to take advantage of the data centres economy then it will need to find sites within the County. As previously noted, Link Park is one of the best locations in Buckinghamshire to deliver a data centre use.
- 6.10 In summary, the Application Site is well suited for a data centre use due to:
1. it is located in close proximity to the railway line and canal which gives ready access to the telecommunications fibre connections needed that run along this route providing the key and necessary links to London.
 2. nearby railway stations currently provide access to London within 60 minutes, which will only reduce further once the new Crossrail stations are operational. Whilst being located geographically far enough away, this travel time / distance meets the required factors for disaster recovery operations; and
 4. The Application Site is accessed via a single road. Those visiting the Application Site can be carefully monitored and unauthorised access will be minimised.

Design

- 6.11 Section 12 of the NPPF (2019) attaches great importance to the design of the built environment, stating that good design is a key aspect of sustainable development, is indivisible from good planning and should contribute positively to making places better for people.
- 6.12 This application is for Outline Planning Permission, however, the design codes will ensure that the proposed development (brought forward through the reserved matters process) is of a high quality of design and will minimise the impact on the Green Belt.
- 6.13 The proposed development has been assessed against Policy EP3 'The Use, Design and Layout of Development' of the South Bucks Local Plan (1999) and Policy DMHB11 'Design of New Development' of the Hillingdon Local Plan: Part 2 as set out in **Table 1** and **Table 2** below.

Table 1 – Assessment of Policy EP3 'The Use Design and Layout of Development of the South Bucks Local Plan (1999)

Policy Requirement	Response
(a) Scale of Development Development should be in scale with surrounding development, including any buildings which are to be retained on the site, and should not adversely affect the character or amenities of any nearby properties or the locality in general. The retention and provision of space between buildings should respect the scale of spaces in the locality.	The proposed development will be a maximum of 55,000sqm and 25m in height. The existing buildings on the Application Site will be demolished to make way for the new development. Building heights across the area do vary in height. Typically within this area the building heights are between 5m and 10m in height, although there are some larger scale built form ranging in height between 10m and 15m, including on Thorney Mill Road itself at the four storey converted Mill that lies above the River Colne. It is considered that the large scale built form is unlikely to result in a dramatic alteration to the character of the surrounding area, particularly due to the dense vegetation surrounding the

	Application Site.
(b) Layout of Development and Siting of Buildings The layout of development and the siting of buildings should make positive use of the intrinsic qualities and features of the site including its topography, landscaping, water features, and views into or out of the site. The siting of buildings should not adversely affect the character or amenities of any nearby properties or the locality in general. The layout should not be dominated by large areas set aside for parking, servicing or access, and where extensive space is required for such activities, it should be subdivided by landscaping. The layout of new development should, where possible, create attractive groupings of buildings and spaces between buildings.	It is considered that the proposed development will bring a visual improvement, such as the removal of discordant and detracting features including aggregate stockpiles. The degree of harm that will arise on the Green belt, as with visual effects, is also contingent on the disposition of built form within the Application Site and its eventual height, layout and orientation. The layout of the proposed development will not be dominated by large areas of parking.
(c) Height of Development The height of new development should respect the height of surrounding development, including any buildings on the site which are to be retained, and the height of buildings in the locality generally. Proposed extensions to existing buildings should reflect the height of those buildings.	The proposed development will be up to 25m in height. The Application Site lies approximately 26m AOD. The surrounding area does not exhibit some variety in height, albeit these variations do tend to be subtle in their nature. These is the overriding perception of being within a generally level landscape. The proposed development will for the most part be screened by the built form that frames the southern side of Money Lane to the left of the view, with the uppermost parts of the introduced built form sitting below the eaves height of these intervening buildings.
(d) Building Form, Design and Fenestration	The design codes for the development will ensure any future development

Buildings should be of a form and design which would respect and harmonise with surrounding properties, including any buildings on the site which are to be retained, and with buildings in the locality in general. Proposed extensions to existing buildings should reflect the form and design of those buildings. The fenestration of extensions to existing buildings should respect the fenestration of those existing buildings. The fenestration of buildings should safeguard against the loss of privacy to residential properties by reason of overlooking.	respects and harmonises with the surrounding area.
(e) Materials The external materials to be used in new developments should be of a type and quality which harmonise with the materials of surrounding development including any existing buildings on the site which are to be retained. Where an existing building is to be extended, the extension should usually be constructed in materials to match the existing building as closely as possible.	The design codes will specify what materials should be used in order to harmonise with the surrounding area.
(f) Use of Land and Buildings The use of land and buildings should be compatible with the uses of adjacent land and buildings and with the character and amenities of the locality in general. Permission will not be granted for uses which would be, or which would have the potential to be, detrimental to the character and amenities of nearby properties or the locality in general by reason of noise,	The proposed use of the buildings is within industrial use (Class B8 (Data Centre)) or Sui Generis (Data Centre) and therefore within keeping of the existing use of the site.

vibration, smell, pollution, disturbance, visual intrusion, loss of privacy, the impact of traffic, or other nuisance.	
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Table 2 – Assessment of Policy DMHB11 ‘Design of New Development’ of the Hillingdon Local Plan Part 2.

Policy Requirement	Response
A. All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and incorporate principles of good design including: i. Harmonising with the local context by taking into account the surrounding: • Scale of development, considering the height, mass and bulk of adjacent structures; • Building plot sizes and width plot coverage and established street patterns; • Building lines and setbacks rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure; • Architectural composition and quality of detailing; • Local topography, views both from and to the site; and • Impact on neighbouring open spaces and their environment. ii. Ensure the use of high-quality building materials and finishes; iv. Ensuring that the internal design	The design codes will ensure any future development will be of the highest standards and will incorporate the principles of good design.

and layout of development maximises sustainability and is adaptable to different activities; v. Protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated and their settings; and vi. Landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.	
B. Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.	As there are no direct residential neighbours, the proposed development will not have an impact on amenity, daylight and sunlight on adjacent properties.
C. Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development proposals for major development sites, the Council will expect developers to prepare masterplans and design codes and to agree these with the Council before developing detailed design.	A set of design codes have been prepared. Any future development will comply with these design codes.
D. Development proposals should make sufficient provision for well-designed internal and external storage space for general recycling and organic waste with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.	Any future development will have well-designed storage for general, recycling and organic waste with a suitable access for collection.

- 6.14 It is therefore considered that the proposed development complies with both Policy EP3 and Policy DMBH11.
- 6.15 Further details of the proposed development can be found in the Design and Access Statement, submitted as part of this application.

Air Quality

- 6.16 Paragraph 123 of the NPPF (2019) states that planning policies should sustain compliance with and contribute towards EU limit values or national objective for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.
- 6.17 The site lies within both the London Borough of Hillingdon Air Quality Management Area (AQMA) and the South Buckinghamshire District Council AQMA. Both AQMAs have been declared due to exceedance of the annual mean objective of 40µg/m³ NO₂. An Air Quality Assessment has been prepared by Cundall and is submitted as part of this application.
- 6.18 The assessment concludes:

"Monitoring within 2km indicated overall downward trend between 2015 and 2019 but still HIL and 20,31 remain above the NO₂ objective in 2019. Site SIL is located 30m from the M4 and sites 30 and 31 are located along Iver High Street. NO₂ concentrations at the proposed development are anticipated to be lower. The annual mean NO₂ concentrations recorded at all of the monitoring sites within 2km between 2015 and 2019 are well below 60µg/m³. Exceedances of the short-term objective are therefore considered to be unlikely. Concentrations of PM₁₀ recorded at sites within 2km between 2015 and 2019 have remained below the objectives. Defra background concentrations within the study area are well below the NO₂ PM₁₀ and PM_{2.5} air quality objectives."

In setting the scope of assessment, considerations has been made of the potential for impacts to occur during both the construction and operation phase of the development, and the exposure, and the exposure of future occupants of the site to air pollution.

A construction dust impact assessment was undertaken in accordance with Institute of Air Quality Management (IAQM) guidance. It was concluded that without appropriate mitigation measures, high risks were posed by demolition and track out activities and medium risks from earthworks and construction activities. Overall, the proposed site posed a high risk of causing significant effects. During construction, receptors within 20m of the construction boundary could be susceptible to dust effects. However, with appropriate mitigation measures implemented, it was concluded that the construction effects of the proposed development would not be significant.

The client will commit to the implementation of the best practice mitigation measures identified in this report during the construction phase of the development. It is anticipated that the generation of dust and harmful pollutants emissions from construction site activities will be reduced with the correct implementation of these measures.

Operation phase impacts associated with operational traffic are likely to be negligible. Impacts descriptors were determined to be negligible at all receptors for all pollutants modelled, excluding NO₂ concentrations at receptors 4 and 5. Slight adverse impacts were predicted at receptors 4 and 5, which are located close to the proposed development entrance, when using 2019 background and emissions. Predicted concentrations at 4 and 5 remain below the annual mean objective and are considered to be overly conservative predictions, due to the retention of 2019 baseline concentrations and emissions.

Dispersion modelling of the diesel backup generators is required and will be provided as a separate addendum report. This process contributions from the generators will be added on to the process contributions from the operational traffic and background concentrations, to enable a cumulative assessment of operational impacts. The addendum report will also report on the air quality neutral assessment and provide recommendations for operation phase mitigation measures will be discussed in the addendum report."

- 6.19 The Air Quality assessment has been submitted in accordance with national and local requirements and is considered to be acceptable in air quality terms and complies with national and local planning policy.

Arboricultural Considerations

- 6.20 Core Policy 9 of the South Buckinghamshire Core Strategy (2011) requires developments to conserve and enhance the natural environment.
- 6.21 Policy DMHB14 of the Hillingdon Local Plan: Part 2 requires developments to retain and enhance existing landscape as well as provide a landscape scheme as part of the application submission.
- 6.22 An Arboricultural Impact Assessment has been prepared by Waterman and has been submitted as part of this application. The Assessment concludes:

"A tree survey of the site was undertaken in November 2020 and the results of that tree survey exercise have been used to guide the design process. That tree survey and the recommendations made in this report follow the principles of BS5837:2012 Trees in relation to Design, Demolition and Construction Recommendations (BS5837) and relevant Local Planning Authority planning policy.

A total of 26no. individual trees, groups of trees and woodlands were recorded as part of the tree survey. Of these arboricultural features, 1no. was awarded a high A grade,

11no. a moderate B grade and 12no. were awarded a low C grade. The remaining 2no. were awarded a very low U grade and should be removed for reasons of sound arboricultural management irrespective of any development proposals.

At the time of writing this report, none of the trees present on or adjacent to the Site were afforded protection through the provisions of a Tree Preservation Order and no part of the site is located within a conservation area.

The purpose of this Arboricultural Impact Assessment is to evaluate the direct and indirect effects of the proposed design on the tree stock present both on and adjacent to the site. In line with Annex B of BS5837, it also contains sufficient information to be submitted in support of any planning application pertinent to the site and the design layout.

A total of 4no. arboricultural features will be removed to facilitate the development. Of these 1no. was awarded a moderate B grade and 3no. were awarded a low C grade. A further 2no. U grade trees will be removed for reasons of sound arboricultural management."

- 6.23 The applicant will take into account any recommendations and/or mitigation measures in relation to trees.

Aviation

- 6.24 The Application Site is located approximately 1.9miles north of London Heathrow Airport (LHR).
- 6.25 A report from Osprey, aviation consultants has been submitted as part of this application. The letter confirms that the development would lie within the lateral confines of the Inner Horizontal Surface (HIS); however, it would be beneath the IHS. No other surfaces of the existing Obstacle Limitation Surfaces (OLS) are affected by the development. The published Instrumental Flight Procedures (IFPs) would be unaffected by the development.

- 6.26 The maximum height of the building is therefore considered to be acceptable.

Ecology

- 6.27 Core Policy 9 of the South Buckinghamshire Core Strategy seeks to increase biodiversity on development sites.
- 6.28 Policy EM7 of the Hillingdon Local Plan: Part 1 seeks to protect and enhance biodiversity. An Ecological Impact Assessment has been undertaken and submitted in support of this application.
- 6.29 The Application Site is located within a Biodiversity Opportunity Area which seeks to increase biodiversity within this area.
- 6.30 The Ecological Impact Assessment concludes:

"From the results of this Ecological Impact Assessment and based on the proposed development plans, the majority of ecological features within the ZOI have been scoped out of the assessment due to insufficient biodiversity conservation value or a lack of an identified pathway for potential effects to occur.

However, one designated site (Lower Colne / Frays Island and Mabey's Meadow Nature Reserve SINCS and Green Belt) has been assessed to be an IEF. As a result of the environmental mitigation and enhancement measures to be adopted as part of the proposed development, it is assessed that the residual impacts of the development would be insignificant provided such measures are adhered to.

Roosting bats are assessed to be a potential IEF and further surveys are required to determine if buildings B1 and B2 support bat roosts. An updated ECIA will be provided should roosting bats be deemed an IEF.

To ensure legal, planning policy and best practice, compliance, mitigation and ecological measures will be provided as part of the scheme as outlined in this report."

- 6.31 The Applicant will take into account any recommendations / mitigation measures with regard to ecology.

Economic Benefits

- 6.32 An Economic Benefits Statement has been submitted in support of this outline planning application. the Statement addresses the economic value to Buckinghamshire in terms of employment, gross value added (GVA) and strategic added value of a data centre.
- 6.33 Buckinghamshire is adjacent to the dominant London market which account for about 30% of data economy. Buckinghamshire's host region, the South East, is the second largest regional data economy, accounting for about 20% of the UK total.
- 6.34 Construction and fit out of a data centre requires investment of about £100m supporting an estimated 200 jobs on site.
- 6.35 Once operational, a data centre at Link Park will require 90 highly skilled workers on site, generating a direct local impact £12m GVA per annum.
- 6.36 As well as direct jobs, the data centre will have the indirect effect of creating at least 65 skilled in the Buckinghamshire's data economy and a further £3.8m GVA per annum.
- 6.37 The Economics Benefit Statement has also considered strategic added value, addressing the data centre as part of the investment required to unlock the growth potential of Buckinghamshire's data economy. Based on published research, the Economic Benefits Statement estimates that Buckinghamshire's data economy could increase its output from £631m in GVA in 2018 to between £740m GVA and £890m GVA by 2025.
- 6.38 Further details of the economic benefits of data centres can be found in the Economic Benefits Statement.

Energy

- 6.39 Core Policy 12 of the South Buckinghamshire's Core Strategy requires all developments of 1,000sqm or more non-residential floor space secure at least 10% of their energy from decentralised and renewable or low-carbon sources, unless demonstrated that it is not viable or feasible.
- 6.40 The London Plan (2016) Policy 5.2 requires developments to reduce carbon emissions by 35%.
- 6.41 An Energy and Sustainability Statement has been submitted in support of this application.
- 6.42 The Energy and Sustainability Statement states:

"An outline surface Water Drainage Strategy has been produced which provides recommendations on how to manage the runoff sustainably to provide sufficient attenuation storage and a restricted post-development runoff rate. A SuDS option such as permeable paving or detention basins (subject to site layout) could be explored at the detailed design stage.

Using PV and heat pumps as detailed within this report, will ensure the Link Park development will be compliant with the Buckinghamshire Council's sustainability targets of securing at least 10% of the (regulated) energy from renewable or low-carbon sources. Further details will be provided at the detailed design stage to confirm how these targets are to be achieved.

Data centres are energy intensive facilities, however, the design and future measures presented in this report confirm that not only the most efficient operations can be achieved, but also that a high proportion of the heat produced by the Data Centre could be utilised whilst maintaining resiliency."

- 6.43 The Applicant will take into consideration the recommendations within this report.

Flood Risk and Drainage

- 6.44 The Application Site is located within Flood Zone 1, 2 and 3. A Flood Risk Assessment has been submitted as part of this application. The Flood Risk Assessment states:

"The majority of the proposed development could be considered 'Less Vulnerable' (data centre and ancillary offices), whilst on-site car parking could be considered 'water compatible'. If fuel storage is to be proposed at the site, this could be considered 'Highly Vulnerable'. The development of a substation is considered 'Essential Infrastructure'.

The proposed development will result in the construction of a building with a floor space that is greater than 1,000sqm. Additionally, the site area is greater than 1ha. Subsequently, under the Town and Country Planning Act (2015), the development would be considered a 'Major Development'. A Surface Water Drainage Strategy is to be required by the Lead Local Flood Authority, London Borough of Hillingdon and the London Plan.

The red line site boundary is located in Flood Zone 1, 2 and 3. However, the extents of Flood Zone 2 and 3 are largely contained to the 'Yellow area', where no development is to be proposed. the 'Blue area' and 'Purple area' are also shown to be partly affected.

The site area is largely shown to be at low risk of fluvial flooding, very low risk of surface water flooding moderate risk of groundwater flooding and low risk of sewer flooding.

In terms of flood vulnerability, the EA Flood Alert and Flood Warning Service can provide significant betterment to site users.

Following the guidelines contained within the NPPF, the proposed development is considered to be suitable assuming appropriate mitigation (including adequate warning procedures) can be maintained for the lifetime of the development."

- 6.45 Overall, it has been demonstrated that the development would be classed as less vulnerable. The proposed development would not increase the risk of flooding elsewhere and therefore considered to be acceptable.

Health Impact Assessment

- 6.46 Healthy Communities' states that development proposals can support strong, vibrant and healthy communities.
- 6.47 Policy 3.2 of the London Plan (2016) states that the impacts of major development proposals on the health and wellbeing of communities should be considered, for example, through the use of Health Impact Assessment (HIA). For the purposes of HIA, a 'major development' complies '10 or more residential units (or a site of 0.5ha or more), or 1000sqm or more of non-residential floorspace (or a site area of 1.0ha or more)'. The proposed development exceeds these thresholds.
- 6.48 A HIA has been undertaken by Barton Willmore on behalf of the applicants, to assess the health impacts of the scheme. the assessment has been undertaken using the London Health Urban Development Unit (HUDU) Healthy Urban Planning Checklist and the UDU Rapid Health effects of the proposed development and provided recommendations to seek to maximise health gains and remove or mitigate potential adverse impacts on health.
- 6.49 The performance of the proposed development has been assessed against 11 key health themes:
- Housing quality and design;
 - Access to healthcare services and other social infrastructure;
 - Access to open space and nature;
 - Air quality, noise and neighbourhood amenity;
 - Accessibility and active travel;
 - Crime reduction and community safety;

- Access to healthy food;
- Access to work and training;
- Social cohesion and inclusive design;
- Minimising the use of resources; and
- Climate change.

6.50 The proposed development is found to have a positive health effect in relation to the majority of the key health themes.

Historic Environment

6.51 The Application Site is not located within a Conservation Area, nor are there any Listed Buildings within close proximity of the Application Site. An Historic Environment Assessment has been prepared in support of this application. the Assessment states:

"The results of this appraisal indicate that potential for as yet unknown buried archaeological remains would likely be low due to the extent of extraction and modern construction activity within the site. Furthermore, considering the existing settings of Listed Building within an approximate 500m study area, and the fact that the woodland bordering the eastern extent of the site will be retained as part of the development, it is considered that setting impacts to Listed Buildings would be of no more than less than substantial, and likely at the lowest end of the spectrum of less than substantial harm, and would not be an impediment to development."

6.52 The applicant would accept a condition requiring further archaeological investigation if required.

Noise

6.53 Policy EM8 of the Hillingdon Local Plan: Part 1 seeks to protect noise sensitive developments. The Application Site is located within close proximity to LHR. A Noise Impact Assessment has therefore been submitted as part of this application. the Noise Impact Assessment concludes:

"This assessment has been undertaken with specific reference to the noise generating plant of the proposed development on the nearest noise sensitive receptors. However, exact details of external building services plant or equipment at the proposed development are currently unknown. Therefore, plant noise at the site cannot currently be assessed in detail.

Operational noise limits have been stipulated for external mechanical services plant associated with the development based on the results of a noise survey.

It is expected that the plant noise limits shall be included in a condition attached to any planning permission granted to the proposed development, to be discharged later once final plant selections are known.

It is expected that evidence of compliance with the proposed noise limits shall be a reserved matter for later determination by the LPA, once detailed design information about the building/s and systems are available and final plant selections are known."

- 6.54 The Applicant would accept a condition relating to noise.

Environmental Risk Assessment

- 6.55 A risk assessment has been submitted as part of this application. The risk assessment concludes:

"The overall environmental risk rating associated with ground conditions for the site is assessed as medium."

- 6.56 The risk assessment sets out a number of recommendations. The Applicant will take these recommendations into consideration.

Site Waste Management Plan

6.57 A Site Waste Management Plan (SWMP) has been submitted as part of this application. The SWMP provides details on:

- Estimate how much excavation, demolition and construction waste might arise;
- Identify possible cost savings;
- Offer ways to minimise and manage construction phase wastes;
- Outline waste minimisation and management objectives; and
- Set waste minimisation and management actions and targets for the construction phase.

6.58 The Applicant will take into consideration the recommendations set out in this report.

Transport and Car Parking

6.59 In accordance with the NPPF (2019), all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. At regional level, Policy 6.3 of the London Plan (2016, as amended) requires the assessment of the effects of transport and seeks to ensure that development considers the impact on transport capacity and the transport network and does not adversely affect the safety of road users and pedestrians.

6.60 A Transport Statement has been prepared by Bellamy Roberts and submitted as part of this planning application. The Transport Statement concludes:

"Personal Injury Accident data has been obtained from Crashmap which has shown there to be no accident or safety problems with the existing highway network.

The site is located in an accessible area, and there are genuine opportunities for sit users to travel to/from the application site using sustainable modes of transport. The proposal will link to the existing footway on Thorney Mill Road, allowing safe and convenient access to the facilities and public transport services in West Drayton.

The proposed development will be accessed from Thorney Mill Road via a new bellmouth junction. Access to the site from the existing access will be closed off however, access to Thorney Mill Sidings site will remain. Access to the proposed development and the Thorney Mill Sidings site will therefore be achieved via two separate accesses, providing a betterment to access safety and operation.

It has been demonstrated that the proposed development and visibility is achievable within highway boundary, in accordance with Design Manual for Roads and Bridges guidance.

Swept path analysis demonstrates that the site is suitable to accommodate the size and type of vehicles servicing the site.

An appropriate level of car and cycle parking will be provided, with reference to the Buckinghamshire Countywide Parking Guidance (2015), to accommodate the developments likely parking demand.

The proposal will result in a decreased level of net daily traffic generated from recorded traffic levels during lawful use for aggregate storage and distribution and asphalt recycling land use. The proposed developments traffic generation will be imperceptible to local users when dissipated on the local highway network."

- 6.61 It is therefore considered that the proposed development would not result in a significant impact on the Local or Strategic Highway Network and accords with National, Regional and Local Planning Policy.
- 6.62 A Travel Plan has also been prepared by Bellamy Roberts and submitted as part of this application. The Travel Plan sets out a list of possible measures and initiatives for the data centre and are mainly aimed at staff. The measures include:
- Site design – conveniently located covered and secure cycle parking.

- Reducing the need to travel.
- Initiatives to support walking and cycling – information and maps will be distributed to staff showing the pedestrian and cycle routes in proximity to the site.
- Public transport promotion – maps and advice will be distributed to staff.
- Car sharing will be encouraged.
- Parking management.
- Promotion and communications – measures and sustainable travel opportunities will be provided in information packs, provided to all staff, posted on noticeboards within the development buildings and on the site occupiers website.

6.63 The Travel Plan submitted as part of this application provides further details of the measures proposed.

Utilities

6.64 A utilities report has been submitted as part of this application. The report provides guidance on the existing utility infrastructure both within the site boundary and to its immediate surrounds and future utility infrastructure for the data centre.

6.65 The Applicant will take into consideration the recommendations put forward in this report.

Wind

6.66 A wind assessment has been submitted in support of this planning application to assess the wind microclimate around the proposed development. It outlines the overall methodology and the use of the Lawson Comfort Criteria to describe the expected on-site wind conditions. The assessment is based upon analysis of meteorological conditions for Iver. The wind assessment states:

"The meteorological data for the site indicates that prevailing winds blow from the south-western sector throughout the year, with secondary winds approaching the site from the north-east especially during the spring season. Winds from other directions do occur, and are considered within the assessment; however, their impact on the overall

expected wind microclimate conditions would tend to be low, due to being relatively infrequent (compared to the prevailing directions).

Baseline wind conditions are expected to be generally suitable for the current use throughout the year, with no expected instances of strong winds at and surrounding the site.

With the inclusion of the proposed development, wind conditions at the site are expected to be suitable for the intended pedestrian use, ranging from suitable for standing use to strolling use during the windiest season. Entrances to the proposed development located at the south-east and north-east corners of Buildings A and B respectively would likely have wind conditions suitable for the intended use due to the localised shelter provided by the 90 degree cut out at the corners.

Overall, wind conditions at and surrounding the proposed development are expected to be suitable for the intended use, and no wind mitigation measures would be required at any specific area of the site. However, the inclusion of 5-8m high deciduous trees and low level planting (approximately 1.5m high) to the west, south and east of the site, as well as between Buildings A and B would help diffusing the oncoming winds and likely to provide beneficial shelter in particularly windy dates throughout the year."

- 6.67 The proposed development is therefore considered to be acceptable in terms of national, regional and local planning policies.

Summary

- 6.68 The planning issue topics identified above have been assessed against relevant planning policy to demonstrate the acceptability of the scheme. This planning application is supported by a number of supporting documents, which should be read in conjunction with this planning statement.

7.0 GREEN BELT – VERY SPECIAL CIRCUMSTANCES

7.1 The Application Site is located within the Metropolitan Green Belt. Therefore, the relevant Green Belt policies at national, regional and the local level need to be assessed. Whilst it is recognised that the local planning authority is of the view that the development is inappropriate, in this case, very special circumstances apply that mean a grant of planning permission should be forthcoming.

7.2 Paragraph 144 of the NPPF (2019) states:

"When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal, is clearly outweighed by other considerations"

7.3 Policy GB1 'Green Belt Boundaries and the Control Over Development in the Green Belt' of the South Bucks Local Plan (1999) states:

"The area in which Green Belt policies will be applied is defined on the Proposals Map.

Within the Green Belt, planning permission will not be granted for development other than for the change of use of existing buildings or land or the construction of new buildings or extensions to existing buildings as set out below:-

- (a) Development for agriculture or forestry*
- (b) Essential facilities for outdoor sport, outdoor recreation or outdoor leisure, in accordance with the policies in Chapter 7 of this Plan;*
- (c) Mineral working and subsequent restoration of the land, in accordance with the policies in the Buckinghamshire Replacement Minerals Local Plan;*
- (d) Cemeteries;*

- (e) Limited extension, alteration or replacement of existing dwellings, in accordance with Policies GB10 and GB11 of this Plan;*
- (f) Limited infilling in existing villages, in accordance with Policy GB3 of this Plan;*
- (g) Other uses of land and essential facilities for them which would not compromise the purposes of including land in the Green Belt and which would permanently retain its open and undeveloped character;*
- (h) The re-use of buildings of permanent and substantial construction in accordance with policy GB2.*

Development falling into the categories above will only be permitted where:-

- (v) the proposal would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and would be in accordance with EP3 (Use, Design and Layout of Development); and*
- (vi) the scale, height, layout, siting, form, design and materials of any new building would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and the proposal would be in accordance with Policy EP3; and*
- (vii) proposals for extensions to existing buildings would harmonise with the scale, height, form and design of the original building; and*
- (viii) the proposal would comply with all other relevant policies in this Plan."*

7.4 Policy GB4 'Employment Generating and Commercial Development in the Green belt' of the South Bucks Local Plan (1999) states:

"The area in which Green Belt policies will be applied is defined on the Proposals Map.

Within the Green Belt, planning permission will not be granted for development other than for the change of use of existing buildings or land or the construction of new buildings or extensions to existing buildings as set out below:-

- (a) Development for agriculture or forestry*
- (b) Essential facilities for outdoor sport, outdoor recreation or outdoor leisure, in accordance with the policies in Chapter 7 of this Plan;*
- (c) Mineral working and subsequent restoration of the land, in accordance with the policies in the Buckinghamshire Replacement Minerals Local Plan;*
- (d) Cemeteries;*
- (e) Limited extension, alteration or replacement of existing dwellings, in accordance with Policies GB10 and GB11 of this Plan;*
- (f) Limited infilling in existing villages, in accordance with Policy GB3 of this Plan;*
- (g) Other uses of land and essential facilities for them which would not compromise the purposes of including land in the Green Belt and which would permanently retain its open and undeveloped character;*
- (h) The re-use of buildings of permanent and substantial construction in accordance with policy GB2.*

Development falling into the categories above will only be permitted where:-

- (ix) the proposal would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and would be*

- in accordance with EP3 (Use, Design and Layout of Development); and*
- (x) the scale, height, layout, siting, form, design and materials of any new building would not adversely affect the character or amenities of the Green Belt, nearby properties or the locality in general and the proposal would be in accordance with Policy EP3; and*
 - (xi) proposals for extensions to existing buildings would harmonise with the scale, height, form and design of the original building; and*
 - (xii) the proposal would comply with all other relevant policies in this Plan."*

7.5 Policy EM2 'Green Belt, Metropolitan Open Land & Green Chains' of the Hillingdon Local Plan Part 1: Strategic Policies (2012) states:

"The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Notwithstanding this, Green Chains will be reviewed for designation as Metropolitan Open Land in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD and in accordance with the London Plan policies.

Minor adjustments to Green Belt and Metropolitan Open Land will be undertaken in the Hillingdon Local Plan: Part 2- Site Specific Allocations LDD.

Any proposals for development in Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Any proposals for development in Green Chains will be firmly resisted unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage

appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain.”

7.6 In this context, the very special circumstances of this proposal is set out below. There are a number of benefits that can be delivered as part of the proposed development these include the following:

- The ability to showcase Buckinghamshire as the premier location as a data centre hub for the UK/Europe, which make reinforce and attract new and additional business to the Borough to the benefits of residents in creating more and new direct and indirect job opportunities;
- The data centre led scheme will make financial contributes to enhance off-site conditions, improving the surrounding public realm, greening of routes and job training, etc.
- Ability to explore the potential of how to use excess heat generated by the cooling of the data centre for wider community benefits;
- The ability to generate an income, through significantly enhance business rates for the Council annually, without creating significant additional demand for community facilities as such as schools, health services etc.
- The retention of direct jobs and the creation of additional spin-off jobs; and
- Reduced traffic impact (particularly HGV movements) for the community, in comparison to the consented site use and compared to an alternative redevelopment vision.

Consideration of the Planning Policy Context

7.7 The existing use of the Application Site is within Industrial uses Class B2 / B8.

7.8 The Application Site is located within the Green Belt. Part of the Application Site has existing built footprint associated with the industrial uses. Therefore, this part of the Application Site can be considered brownfield in a Green Belt setting. As a matter of principle, the redevelopment of this part of the Application Site, subject to scale and visual impacts etc. should be capable of being considered acceptable.

7.9 The part of the Application Site which has no built footprint on it is a greenfield parcel in the Green Belt. As a matter of principle, development is likely to be seen

as “inappropriate” and so a higher “very special circumstances” case would need to be demonstrated in order for planning permission to be justified.

7.10 In the above context, a key question will be how the Application Site can be best utilised for the benefit of the community through redevelopment, as part of maximising the beneficial use of previously developed land. an equally important question will be whether the entire Application Site is required in order to deliver the maximum benefits to society, or whether development should be restricted to the brownfield portion only.

7.11 We consider a data centre use of the entire Application Site maximises the benefits nationally and locally and that these benefits create the very special circumstances sufficient to justify the issuing of planning permission, contrary to the development plan and Green Belt policy. The rationale for this view is as follows:

National Interest

- The UK is a leading market for data centres in Europe and is critical to the global network of data centre coverage. The storage and manipulation of data is growing exponentially and underpins the vast majority of the world economy. The government has recognised this, and recently identified data centres as “UK critical infrastructure” alongside sectors such as the NHS and defence. As the UK leaves Europe, it needs to establish its role in the world. As a world leader in data centre provision, taking full advantage and maximising and leveraging the benefits is a clear national political objective. The consequences of COVID-19 and the immediate switch to working from home and video conferencing etc, has only reinforced the importance of having sufficient data centre capacity to manage and manipulate data.
- The traditional data centre clusters (Slough-Hayes, Park Royal and Docklands) do not have the capacity to accommodate all the demand for data centre expansion. In addition, operators are increasingly concerned about being too reliant on a single power station/supply. Therefore, new locations are attracting interest as attitudes change. As a consequence, there is the potential for a limited number of new geographic locations to benefit from the massive growth in investment and business rates that follow the establishment of a data centre cluster. A clear location is Buckinghamshire (because of proximity to the Slough cluster).

- Traditional UK locations are at capacity and so the creation of new locations is now needed, and quickly given the surge in demand and permanent shift in business operations resulting from COVID-19. There are very few locations and sites in the UK where new data centre clusters can be delivered because of the requirements of operators (coincidence of power, fibre, no flooding concerns, no concerns over proximity to disaster risks, site size etc).
- Buckinghamshire (and the Slough to Hayes “Golden Triangle” specifically) is one of only a few UK locations that appears to be suitable as a new data centre cluster. As a consequence, it is in the UK national interest to quickly deliver new data centre permissions.

Local Interest

- Encouraging a new cluster of data centre provision has huge potential. So, it is in the Buckinghamshire / LB Hillingdon, and local sub region’s interests to also take advantage of the data centre sector investment. On average, each data centre over its lifetime result in c.£1b of investment and creates a desire for other businesses to locate close to a newly established cluster of data centres.
- Direct and indirect jobs are created in a sector that is growing exponentially. It will broaden out the economic base and will also ensure Buckinghamshire / LB Hillingdon is engaged in one of the few global sectors that is expanding.
- Business rates payable on data centres are significantly more than other forms of businesses and are annually multi-million pound contributors to council income.
- If Buckinghamshire / LB Hillingdon chooses not to embrace the data centre interest, then that interest and the benefits that accompany it will focus and be delivered elsewhere. Given the immediate need for the creation of additional capacity, it is in the local interest to capture that investment quickly.
- More locally, a data centre use will significantly reduce highway traffic compared to other potential uses of the site, thereby improving highway

safety. The opportunity also exists to make available to the public land that is not needed for the data centre uses and to consider if excess hot water generated by the data centre use could be harnessed for wider community benefit.

Proposition

- 7.12 The choice that decisions makers are asked to therefore consider is whether they wish to embrace the creation of a new data centre cluster in Buckinghamshire / LB Hillingdon and the economic benefits this will bring, or whether the protection of green belt is more important. Planning policy nationally and locally has not yet created a policy context to support or regulate the data centre sector. Given the data centre sectors very specific operational/ locational requirements, in the context where development management planning policy has not been developed, where proposals are brought forward judgement will be required by planning officers and decision makers in situations where planning policy would indicate refusal but material considerations are substantial.
- 7.13 The above context applies to the application site because of its location in designated green belt. The application site is previously developed and so the key consideration may well be the acceptability of developing at a greater density and height. Data centres by their nature are not flexible in terms of their scale, height, massing, bulk etc. For a data centre use to be viable on the site a large part of the site than the previous occupation will be required.

8.0 CIL AND PLANNING OBLIGATIONS

- 8.1 Buckinghamshire's CIL Charging Schedule came into effect on 17 February 2020. The CIL rate for either B8 (Data Centre) or Sui Generis (Data Centre) is £35 per sqm.
- 8.2 CIL liability is required to be calculated in accordance with Regulation 40 and schedule of the Community Infrastructure Levy Regulations 2010 which states that CIL is payable on all chargeable floorspace (GIA) permitted pursuant to this permission.
- 8.3 It is estimated that CIL Liability for Buckinghamshire in total will equate to approximately £1,925,000. As there is no built development within Hillingdon's administrative area, there is no liability in the Borough of Hillingdon with the Greater London Authority.
- 8.4 The proposed HoTs for Section 106 have been developed in line with the legal requirements set out in the Community Infrastructure Levy Regulations 122, which states that planning obligations may only be sought where they meet all of the following tests:
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 8.5 The planning tests are further reinforced at Paragraph 55 of the NPPF (2019). The National Planning Policy Guidance (NPPG) recognises that any planning obligations must be fully justified and evidence and should not prevent development going forward.
- 8.6 The draft HoTs for the Section 106 legal agreement will include the gifting of the woodland to the local authority for public amenity use.
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9.0 SUMMARY

- 9.1 This Planning Statement has been prepared in support of a full planning application for the following development:

"Outline planning permission with the details of access, appearance, landscaping, layout and scale reserved for later determination. Demolition and redevelopment to comprise a data centre (Use Class B8 (Data Centre) or sui generis (Data Centre) of up to 55,000sqm (GEA) including ancillary offices, internal plant & equipment and substation. In addition to the above the Development may also include: car parking; provision of external plant and equipment and fuel storage; creation of servicing areas and provision of associated services, including waste, refuse, cycle storage and lighting; and for the laying out of the buildings; routes and open spaces within the development; realignment of railhead; all associated and ancillary works and operations including but not limited to: demolition; earthworks; provision of attenuation infrastructure, engineering operations."

- 9.2 The application proposes a data centre of up to 55,000sqm and a maximum height of 25 m.

- 9.3 The Application Site is located within the Green Belt. The proposed development would deliver the following benefits:

- The ability to showcase Buckinghamshire as the premier location as a data centre hub for the UK/Europe, which make reinforce and attract new and additional business to the Borough to the benefits of residents in creating more and new direct and indirect job opportunities;
- The data centre led scheme will make financial contributions to enhance off-site conditions, improving the surrounding public realm, greening of routes and job training, etc.
- Ability to explore the potential of how to use excess heat generated by the cooling of the data centre for wider community benefits;

- The ability to generate an income, through significantly enhance business rates for the Council annually, without creating significant additional demand for community facilities as such as schools, health services etc.
- The retention of direct jobs and the creation of additional spin-off jobs; and
- Reduced traffic impact (particularly HGV movements) for the community, in comparison to the consented site use and compared to an alternative redevelopment vision.

9.4 The Application Site presents a scarce and important opportunity for Buckinghamshire (and UK Plc) to protect and extend its dominance of the European data centre market. This has added importance because of the uncertain future Britain may have in the coming years following our exist from the European Union.

9.5 More locally, the data centre use will deliver substantial business rates and provide direct and indirect employment for the Council. It will help cement Buckinghamshire as a globally leading data centre hub.

9.6 Taken as a whole, the proposed development benefits are significant for the UK and locally do not cause harm.

9.7 The proposed development has been designed with full regard given to the relevant planning policy framework, conforming to national, regional and local planning policy.

APPENDIX 1
SITE PLAN

APPENDIX 2
KNIGHT FRANK UK DATA CENTRE REVIEW

UK Data Centre Market Review

Link Park Suitability

1.0 INTRODUCTION

- 1.1 Knight Frank is a leading data centre brokerage firm and is instructed by the link Park site owners. This briefing paper is prepared to support pre-application discussions for a redevelopment of Link Park to provide data centre use.

2.0 DATA CENTRES

- 2.1 Data centres are buildings that contain lots of powerful computer servers that are connected to the world wide web via the hard wired data fibre cable network spanning the world, or satellite, that provide the ability to upload, download and store data quickly, without interruption, and securely. For example, data centres are fundamental to the sending, receiving and storing of e-mail.
- 2.2 Computers run on electricity and so require lots of power to keep the computers working and to provide cooling to maintain a stable temperature environment for the computers to work optimally.
- 2.3 Various back-up systems are required so that the computers are always operating and are not interrupted if the main source of power, for example, is interrupted. This can be achieved by having back-up diesel generators and/or having a secondary connection to a different power station.

3.0 EVOLUTION OF THE DATA CENTRE MARKET

- 3.1 The data centre market has been evolving ever since the creation of computers in the mid-1970s and the world wide web in 1989. The storage and manipulation of data has become an increasingly important part of the economy and day-to-day life. The use and manipulation of data is now so ingrained in our economy, with ever increasing reliance on technology, that it is critical to how the vast majority of the world works and is expected to work into the future. This growth is fuelled principally by:
1. Increasing adoption of cloud computing, digitization, and virtualization by major enterprises;
 2. Increasing global IP traffic due to improving broadband and other internet mediums; and
 3. The growing usage of social media as well as content-based online media services.
- 3.2 The quantitative need for data centres, the sophistication of buildings housing data storage and manipulation, the evolution and efficiency of the business model of data centres, and the

resultant response of the property sector to how to provide for the needs of data centres has also changed over time.

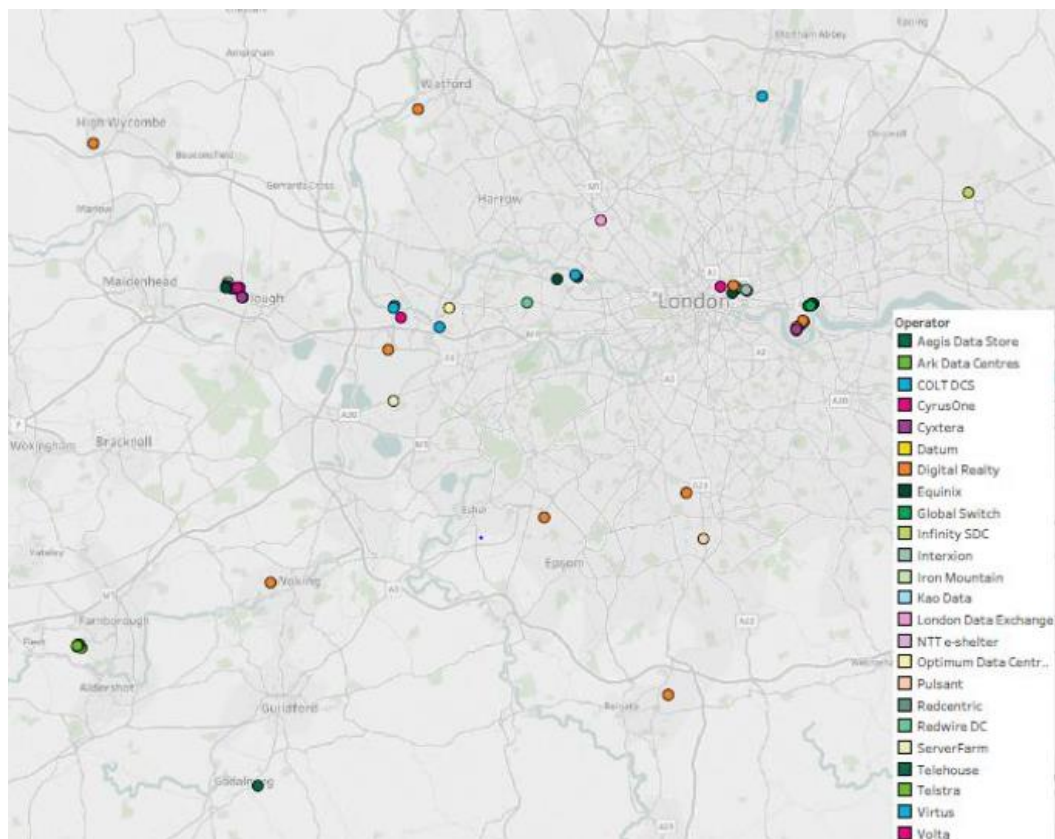
- 3.3 As the data market has grown over the years, it has changed from adapting warehouse type building shells into storage of data, or building a data centre within the warehouse shell itself, to building bespoke and highly efficient purpose built data centre buildings. The data centre sector is now sufficiently important that the preferred model is to find land and opportunities to build purpose-built data centres.
- 3.4 In summary, there are three general levels of the data centre sector:
1. Small and medium Individual company owned and managed data centres. At its simplest, the computer room in a small business office. At its largest, examples such as GCHQ, the UK NHS, and British military and so on;
 2. Bespoke data centre hosting companies that own and operate data centres and then rent out space to individual companies to hold their data. There are perhaps 50 global operators, such as: Colt; Vantage; Equinix etc. Occupiers of the data storage capacity can be small or very large; and
 3. Large scale companies that utilise the WWW to operate their businesses from. These have become known as cloud providers and include the likes of: Amazon; Google; Microsoft; Apple; etc. These companies build, own and operate their own data centres for their own purposes and can also provide hosting facilities for others to rent.
- 3.5 The significant demand currently experienced (in types 2 and 3) is currently driven by the increase in Cloud application take-up, with more corporate entities and general business preferring to adopt flexible cloud based application solutions rather than a reliance on premise server rooms (1).

4.0 THE UK DATA CENTRE MARKET

- 4.1 For a location to be viable for data centre operators they need to meet minimum requirements. These can be summarised as:
1. Power – needs to be close to a high capacity power station;
 2. Fibre – needs to be near the fibre optic power cable network;
 3. Security – cannot be in a location where security might be compromised;
 4. Disaster – cannot be in a location where a disaster might compromise the facility (e.g. gas or petrol explosion, train or air crash); and
 5. Flooding – cannot be in the flood plain or close to a river or sea.
- 4.2 In the UK, the fibre optic cables come from America via Wales, up the M4 and the Great Western Railway lines, along the Grand Union Canal through London and exiting via the Docklands and onto Europe. There are key power stations in the vicinity of the fibre routes that create “hot spots” where power and fibre co-inside.

4.3 The London Data Centre market is the second largest globally (largest being North Virginia, USA). In Europe London dominates but other data centre concentrations are focused in Frankfurt, Amsterdam, and Paris.

4.4 The following diagram shows the locations of data centres in London.



4.5 The epicentre of activity in London is situated within the Slough to Hayes “Golden corridor” as illustrated below.



- 4.6 The main drivers for this clustering of development are the two data centre development fundamentals, power and fibre. The area is well served by high voltage DNO and National Grid substations and benefits from the existence of a plethora of national and international telecommunication fibre providers situated within both the Great Western rail-line and the Grand Union Canal, providing the data centre operator with the ability to offer carrier neutral solutions.

5.0 MEASURING DATA CENTRES

- 5.1 Traditional industry (not IT) measures building value via floorspace. This is because floorspace is the key determinant of value, as people and physical making processes need to be accommodated and there are minimum requirements to house these. There are many different company sizes and therefore demand for many different building sizes and configurations.
- 5.2 In the data centre world, there is less flexibility over how to use building floorspace to create maximum efficiency. Power supply is the key determinant of value because power is needed for the running, cooling and maintenance of the computers. Humans are not needed for the day to day operation, other than for maintenance. There is, therefore, a specific equation to create the most efficient data centre building layout based on power supply. Data centre sizes therefore increase in well-defined size/power steps to deliver efficient and commercially viable buildings. The flexibility between different data centre size categories is often to do with how the volume is delivered (vertical or horizontal) rather than flexibility of building volume.
- 5.3 In this context, the smallest viable data centre houses one data hall (comprising a collection of c.6,300 computer racks) and requires 50 MW of power to run. Anything less than this and the scheme becomes uneconomic to provide.

- 5.5 Traditionally, the average sized UK data centre would have been between 15MW – 25MW sat over 3-5 acres, with a multitude of international corporates leasing retail sized spaces and power (sub 1MW / 1100m²) from colocation operators. However, since the creation of Cloud (which acts as the We Work of the data centre sector), this average size has doubled and as such the minimum plot acreage for operators is in excess of 10 acres with the 'sweet spot' being 10 – 15 acres.

6.0 UK DATA CENTRE DEMAND

- 6.1 London's share of the total FLAP (Frankfurt, London, Amsterdam and Paris) market size remains at c.40% as the market reached c.590MW in 2019.
- 6.2 London saw 110MW of further supply during 2019, compared to just 17MW in 2015, which further illustrates the extent of market activity in recent times and the fact that occupational deployments are substantially increasing in size, with the net effect being a need for larger plots to facilitate Hyperscale Cloud deployments.
- 6.3 Two of the new facilities in London built in 2019 include wholesale (minimum occupational deployments of 1MW+) developments by Ark (Enfield) and VIRTUS (Stockley Park). For Ark, this marks their fourth UK site and VIRTUS's seventh facility in London as it seeks to further expand its capacity in the Slough /Stockley Park corridor. A new entrant to the London market will be E-Shelter when it opens its 50MW Dagenham facility.
- 6.4 2020 H1 has seen a strong start supported by current epidemic conditions, forcing the population to work remotely and hence demand more data. Knight Frank expect the market to remain strong overall and London will have a significantly strong H2 performance.
- 6.5 In 2019, London recorded the highest annual take-up of any European market in history outperforming the record (77MW) set the previous year. Its 102MW (including pre-let and optioned space & power) equivalent to the highest combined take-up for all the FLAP cities combined prior to 2016. To capture the increasingly large Hyperscale (Google, AWS and Microsoft) deployments, new facilities coming to the market are increasingly larger. As the Hyperscale now want the flexibility to ramp up 20MW+ either in a single deployment or within a relatively short period of time, developments from fast growing developer-operators such as ARK, CyrusOne, E-Shelter and VIRTUS are growing much larger in scale ranging from 20MW to 50MW in IT power.
- 6.6 The significant demand experienced is currently driven by the increase in Cloud application take-up, with more corporate entities and general business preferring to adopt flexible cloud based application solutions rather than a reliance on premise server rooms. In addition, with the general population forced to work remotely through global COVID crisis, additional Cloud demand has been witnessed as people communicate through email and Cloud applications such as Zoom and Microsoft Teams, all of which are run through London's data centre network. This increase in demand has seen most data centre operators sell vast amount of existing technical white space forcing all bar none to commence new site searches.

7.0 WEST LONDON DATA CENTRE DEMAND

- 7.1 The following confidential 'known' immediate London - West London data centre customer requirements have been openly discussed by the market, which reflects 26.5% of 2019 supply. For the avoidance of doubt, this information is to be treated in strictest confidence;

1	Google Cloud	100MW
2	Microsoft Azure	150MW
3	Amazon (AWS)	100MW
4	Astra Zeneca	15MW
5	IBM Softlayer	5MW
6	Ten Cent	10MW
7	Alibaba	10MW
8	China Mobile	25MW
	TOTAL 'Known'	415MW

- 7.2 Knight Frank is currently acting for two UK based data centre operators seeking new data centre development sites within the 'Golden Corridor' and is aware of at least ten operators who also hold existing similar requirements. In addition, Knight Frank are the appointed selling agent on Axis, Langley – a 16-acre data centre development, which secured a resolution to approve in September 2020. Knight Frank have already received significant interest from over ten global data centre operators.

- 7.3 Typically, the minimum requirements attributing to viable data centre development in London include the following;

Location	Slough – Hayes corridor
Size	10 acres + (ideally 15 acres)
Planning	Existing B8 use or an ability to secure
Previous	Clean or remediated land with sufficient load bearing capacity
Tenancies	Vacant Possession / maximum WAULT of 18 months
Surrounding	Ideally away from residential (large enough plots provide an opportunity to 'design around')
Power	75MW IT load potential (Assumes an incoming 100MVA diverse connection and a design PUE of 1.25)
Fibre	Sites with nearby access to the Great Western Rail-line and Grand Union Canal (fibre studies required to confirm capacities within)
Utilities	Evidence of sufficient nearby water and gas connections

- 7.4 The data centre market has historically and continues to be opaque. This is because unlike other property sectors, some users need to remain secretive as the data they hold can be a security issue. Therefore, whilst the above is published data centre demand there will be a considerable additional data centre demand that is not factored into the above figures but nonetheless need to be provided for.

8.0 IMPORTANCE OF BUCKINGHAMSHIRE AS A NEW DATA CENTRE CLUSTER

- 8.1 Currently the data centre market believes there is a general over reliance on Hayes (8 data centres dotted around Stockley Park and Bulls Bridge Road) and more so on Slough (19 data centres within one industrial estate) and as such the market is focussing its efforts on creating a new prime data centre market, ideally within touching distance of both the established core markets.
- 8.2 Knight Frank have undertaken a significant desk top exercise to assess existing 'industrial' sites within the 'Golden Corridor' that meet those requirements listed above, albeit would stress that Link Park is the only sizeable industrial site within the required locations currently available to trade and subsequently develop;



1	Brett Aggregates	Requires significant redevelopment
2	Uxbridge Road Gas Works	Acquired by Yondr in January 2020
3	Multi-let Industrial and offices	Knight Frank has discussed redevelopment potential with the vendor but this will not come forward for at least 3-5 years given existing tenancies
4	Axis, Langleigh	16.5-acre Data Centre development sale led by Knight Frank. Four offers received with a further 6-7 anticipated
5	Ridgeway Business Park (<u>Bucks</u>)	Large speculative industrial (B8) development by Royal London. Potential for future data centre Leases/development
6	Heathrow Distribution Centre	Long term industrial Lease. Potential for long term data centre redevelopment
7	Thorney Business Park (<u>Bucks</u>)	Multi-let industrial with potential to undertake data centre redevelopment in the short to medium term

8	Wexham Springs (<u>Bucks</u>)	A 15-acre office park well located for data centre development. Knight Frank understand the vendor is currently holding conversations with Bucks LPA.
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9.0 Link Park

9.1 Link Park is a c.15-acre industrial site is situated within a prime data centre location sat within fibre connection capability of the two existing data centre zones, Slough Trading Estate and Stockley Park Hayes. Perhaps more crucially, the site is uniquely situated within close proximity of the two-critical data centre development fundamentals; that being power and fibre as illustrated below.



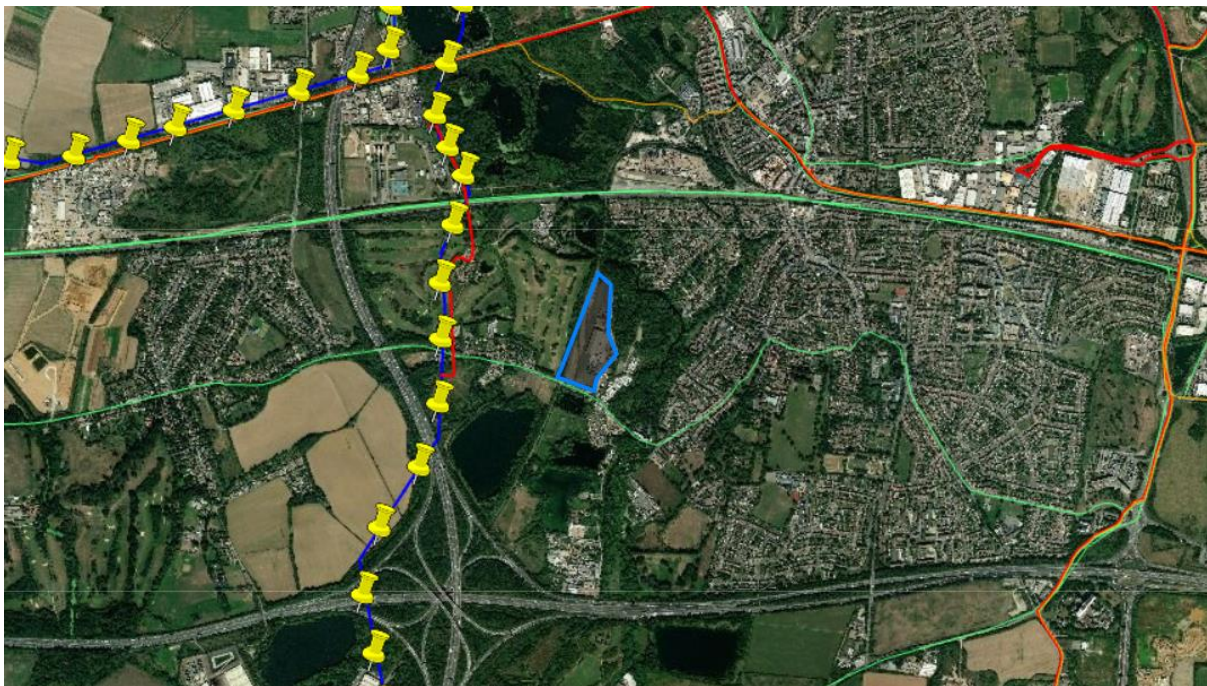
9.2 In addition, the site is devoid of any flood or flight path risk. The following analysis explains why Link Park is ideal for data centre use from an occupier perspective.

Location: The site is enviably located within London's most sought after region (Slough to Hayes corridor). The driver for the demand within this region is the proximity to existing Hyperscale Cloud facilities located at the Slough Trading Estate and Stockley Park. The location allows a viable site in this locality acts as a genuine campus expansion, extinguishing the need to create a new Cloud zone.

Power: The site is exactly 6km due south of the Laleham (275KV National Grid owned substation). Data Centre operators seek sites which offer the ability to secure power directly from National Grid 275KV facilities as the assumption is that one should never lose power, as if this substation were to go down, then half of west London would go down with it.

In addition, it is worth noting that the 275KV National Grid high voltage lines that run along the southern boundary of the site (Thorney Mill Road) which provides a feasible and non-disruptive power procurement strategy

Fibre: This micro region benefits from nearby Points of Connections (POC) to all major national and international telecommunication providers. Most Telco's have presences in ducts within the Great Western rail-line and the Grand Union Canal. See plan below (Red = SSE, Orange = U Networks, Purple = Zayo and Green = Colt).



Other Data Centre Development Risk: We have undertaken a detailed desktop analysis and would comment that the site is void of any flood, flight or COMAH risk.

10.0 CONCLUSION

- 10.1 This report has demonstrated the importance of the data centre market to the global economy and the leading role the UK plays as a host region. Data centres are classified by the UK government as "UK critical infrastructure" and represents a key growth sector for the UK economy into the future.
- 10.2 Within the UK the Hayes to Slough Golden Corridor is critical. The traditional data centre capital of Slough is now reaching maximum capacity. In light of Buckinghamshire's location, it has the potential to become a key future data centre cluster to cater for the growth in the data centre economy that can no longer be accommodated in Slough and reap the rewards on offer. Within Buckinghamshire, the corridor running alongside the M4/Grand Union Canal and in the vicinity of the Iwer power station provides the ideal focus for the new data centre cluster. Link Park lies at the centre of this corridor and therefore represents a highly sought after and important potential data centre site. The known demand for data centres is at least 7-8 sites and means

if Buckinghamshire is to take advantage of the data centre economy then it will need to find sites. As previously noted, Link Park is one of the best locations in Buckinghamshire to deliver a data centre use.