SECTION 35 DIRECTION – QUALIFYING REQUEST

SDC M40 CAMPUS

21 JANUARY 2026 (AS SUPPLEMENTED ON 27 FEBRUARY 2026)

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CONTENTS

1.0 EXECUTIVE SUMMARY

1.1 This document constitutes a qualifying request for a direction under section 35 of the Planning Act 2008 (**the PA 2008**) for a proposed data centre campus to be treated as development for which development consent is required. The proposed data centre campus forms part of the SDC M40 Campus project at Wapseys Wood landfill site in Buckinghamshire (**the Project**).

1.2 The Project comprises three inter-related components: (i) a data centre campus of up to three hyperscale data centre buildings (including server halls and cooling infrastructure (air cooling is proposed), designed for an IT load of up to c.300MW across the three buildings (c.100 MW each) (**the Data Centre Campus**); (ii) an integrated on-site energy centre intended to provide a resilient and reliable power supply to support the Data Centre Campus – this energy centre constitutes a nationally significant infrastructure project (**NSIP**) in its own right; and (iii) relevant associated development to support the Data Centre Campus and the energy centre.

1.3 If the requested direction is given by the Secretary of State, it will enable the Data Centre Campus to be authorised together with the energy centre and associated development as a single Project by way of a development consent order (**DCO**).

1.4 The case for the Data Centre Campus to be considered of national significance is compelling and is supported by national policy (with reference to the 'Policy Statement by the Department for Communities and Local Government: Extension of the nationally significant infrastructure planning regime to business and commercial projects' (the **"Policy Statement"**))[1]. This qualifying request demonstrates that the Data Centre Campus is of national significance for the following reasons:

1. Data centres are critical national infrastructure that are vital to the functioning of the UK economy and a sector in which the UK has a globally important role, as recognised by the UK Government. Data centres are the foundational physical infrastructure of the Fourth Industrial Revolution and as the UK and global economy transitions to digitisation through business, governmental and social factors, it is recognised that there is an overwhelming need for data centre development (both in the UK and in the London Region (where the Data Centre Campus is proposed to be located));

2. The exponential growth in demand has been recognised by the UK Government as overwhelming and this need must be addressed now. The Data Centre Campus represents a large contribution to meeting that national need (c.5% of next 5 years);

3. The Data Centre Campus would represent one of the largest data centre developments in the UK at c.300MW and up to c.240,000 sqm. These figures alone would put it in the top ten data centres nationwide that are built or approved. The overall maximum building footprint is six times the size of an indicative threshold for national significance (as set out in the Policy Statement);

4. The Data Centre Campus is of national significance by virtue of the significant economic benefits that the development will deliver. The data centres comprising the Data Centre Campus represent a £2billion investment and would lead to the delivery of approximately 400 jobs equating to an estimated wage bill of £17 million - £27 million;

[1] https://data.parliament.uk/DepositedPapers/Files/DEP2013-1729/Policy_Statement_By_DCLG.pdf

5. A direction under section 35 of the PA 2008 would permit the Data Centre Campus and the energy centre to be consented via a single authorisation process. The Data Centre Campus is functionally and physically linked to the energy centre (an NSIP) being brought forward at the same time, therefore the Project would benefit from being considered as a whole under a single DCO application; and

6. The energy centre that serves the Data Centre Campus qualifies in itself as an NSIP as it has a generating capacity greater than 50MW. The proposal for the energy centre to power the Data Centre Campus, and the relationship between the Data Centre Campus and the energy centre, adds significant additional weight to the case for national significance in respect of the Data Centre Campus.

2.0 INTRODUCTION

INTRODUCTION

2.1 This document is a qualifying request for a direction by the Secretary of State under section 35(1) that the proposed Data Centre Campus be treated as development for which a DCO is required.

THE PROJECT

2.2 The overall scheme is known publicly as "SDC M40 Campus" (referred to in this qualifying request as the "**Project**") comprises, in overview terms, three inter-related components:

1. The Data Centre Campus - a data centre campus of up to three hyperscale data centre buildings (including server halls and cooling infrastructure (air cooling is proposed), designed for an IT load of up to c.300MW across the three buildings (c.100 MW each).
2. An integrated on-site gas turbine energy generation centre (designed to be decarbonisation-ready), with a generating capacity of c.270MW to 350MW (the "**Energy Centre**"). The Energy Centre will utilise the existing on-site gas pipeline with an indicative gas connection capacity of up to c.900MW. The Energy Centre is intended to provide a resilient and reliable power supply to support the Data Centre Campus.
3. Associated development which includes infrastructure necessary to support the construction, operation and resilience of the Data Centre Campus and Energy Centre.

2.3 A more detailed description of the Project is set out in Chapter 4.

2.4 Data centres are not a type of development that is automatically treated as an NSIP (subject to relevant thresholds / criteria being satisfied) under the PA 2008. Ordinarily, the relevant consenting route for the Data Centre Campus would be under the Town and Country Planning Act 1990 (the "**1990 Act"**) by way of planning permission from the Local Planning Authority.

2.5 However, as of 8 January 2026, data centres are a prescribed type of 'business or commercial project' referred to in relevant legislation which provides that data centre projects are capable of being the subject of a direction by the Secretary of State under section 35 of the PA 2008 (see Chapter 6 for more detail).

2.6 The Energy Centre constitutes an NSIP in its own right. This is on the basis that it is a generating station which is (a) in England; (b) does not generate electricity from wind or directly from sunlight; (c) is not an offshore generating station; and (c) has a capacity of more than 50MW.[2] Therefore, development consent is required for that component of the Project under the PA 2008.[3]

2.7 Given the integrated nature of the Project, a dual-consenting route (DCO for the Energy Centre and planning permission for the Data Centre Campus) would be sub-optimal and risks unnecessary complexity, duplication and uncertainty for consultees, decision-makers, stakeholders and the Applicant.

2.8 Accordingly, this document constitutes a qualifying request by the Applicant for a direction by the Secretary of State that the Data Centre Campus be treated as development for which development consent is required. The effect of the Secretary of State making a direction would be that the Applicant is in a position to submit a single

[2] Section 14(1)(a) and section 15(1) and (2A) of the PA 2008
[3] Section 31 of the PA 2008

DCO application for the Project i.e. the Data Centre Campus, the Energy Centre and relevant associated development. If granted, the DCO would authorise the entirety of the Project.

2.9 For the purposes of section 35ZA, this written request specifies the development to which it relates (e.g. see chapter 4) and explains why the conditions in section 35(2)(a) and (b) are met in relation to that development (see Chapter 6), with the national significance case addressed in Chapter 7.

THE APPLICANT

2.10 The Applicant for the DCO will be Slough Holdings UK Limited, a wholly owned subsidiary of affiliated investment funds managed by SDC Capital Partners, LLC.

2.11 SDC Capital Partners was founded in 2017 and is an operationally focused digital infrastructure investment firm that has approximately $8.8 billion of assets under management. SDC Capital Partners areas of focus include data centres, network and fibre, and wireless infrastructure.

2.12 SDC Capital Partners principal experience is as operators, building businesses from the ground up, and this perspective informs its investment philosophy and approach. SDC Capital Partners seek irreplaceable assets and teams around which to build the platforms that will become the next generation of global technology. It invests in debt and equity, with and without control in opportunities where it can leverage its operational expertise to partner with exceptional managers and owners in creating value.

2.13 SDC Capital Partners provide growth equity, preferred equity and structured debt investment and structure its investments to best align with each specific opportunity. From single asset and platform acquisitions to strategic minority investments, SDC Capital Partners is built to provide flexible, nimble and thoughtful investment capital.

2.14 The proposals for the Energy Centre are being developed in collaboration with Veolia, who is both the landowner of the relevant site (described in Chapter 4) and the Project's energy engineering partner. Veolia has extensive experience in the development, delivery and operation of innovative, efficient and sustainable energy infrastructure. Veolia is a global specialist in resource management, including water, waste and energy services, and will play a key role in the delivery and operation of the on-site energy infrastructure forming part of the Project.

2.15 The Applicant is supported by a multidisciplinary project team including experienced designers, environmental consultants and technical specialists with a proven track record in the design, delivery and operation of major data centre and energy projects.

QUALIFYING REQUEST STRUCTURE

2.16 This qualifying request is structured as follows:

- **Chapter 1**: **Executive Summary**
- **Chapter 2: Introduction**
- **Chapter 3**: **Digital Infrastructure Overview**
- **Chapter 4**: **Project Description and Location**
- **Chapter 5**: **Consultation Stakeholder Engagement**
- **Chapter 6**: **Request for a Section 35 Direction – Qualifying Request**

- **Chapter 7**: **Case for National Significance**
- **Chapter 8**: **Conclusion**.
- **Appendices**:
  - **APPENDIX A: SITE PLAN**
  - **APPENDIX B: DRAFT DIRECTION**
  - **APPENDIX C: SITE LOCATION PLAN**

3.0 DIGITAL INFRASTRUCTURE OVERVIEW

WHAT IS A DATA CENTRE?

3.1 Data centres are buildings dedicated to housing computers and digital storage and are a critical component of the UK's digital infrastructure; supporting the IT needs of governments, businesses and society. They support the online networks and digital services that modern society relies upon, including email, internet services, cloud computing, NHS records, financial systems and national defence. Data centres facilitate large-scale computing and are critical for running and managing digital applications, websites, and cloud services, as well as storing data for governments, businesses and individuals.

3.2 The UK Government has designated data centres as *Critical National Infrastructure* in recognition of their vital role in supporting economic growth, public services and national security, and the importance of data sovereignty in ensuring the security, resilience and integrity of data stored and processed within the UK.[4] Data centres can range in size, from internal rooms within offices, to standalone facilities or clusters of data centre buildings.

3.3 The key components of a data centre's architecture include:

1. **Servers**: The physical or virtual machines that process data and run applications.
2. **Storage Systems**: Devices that store data, such as hard drives, solid state drives, and storage arrays.
3. **Networking**: Routers, switches, and cables that enable communication between devices inside and outside the data centre.
4. **Power and Cooling**: Backup power supplies, such as generators and uninterruptible power supplies, and cooling systems to maintain the optimal temperatures for data centres to operate efficiently.
5. **Security**: Both physical security (cameras, guards, access controls) and cybersecurity measures to protect data and infrastructure.

3.4 The development of digital infrastructure, including data centres, is central to building a modern, competitive economy. Every business is now reliant upon computing equipment to run its web applications, offer services to customers, sell products, or run internal applications for accounts, human resources, and operations management. As a business grows and IT operations increase, the scale and amount of required computer equipment also increases exponentially. Computer equipment that is distributed across several branches or locations of a business can be hard to maintain, which means that companies now increasingly use data centres to bring their devices to a central location, often managed by a third-party.

3.5 The need for additional data centre capacity has increased rapidly in recent years, driven by cloud computing, artificial intelligence, data-driven decision-making and the digitalisation of public and private services. Each business has unique technology and IT needs, but in most cases, a data centre can provide valuable support. By leveraging the advanced infrastructure of a data centre, businesses can access superior services at a lower cost than what they could achieve independently. This makes data centres a highly effective solution for many organisations to benefit from enhanced technology without incurring prohibitive expenses.

4 https://www.gov.uk/government/news/data-centres-to-be-given-massive-boost-and-protections-from-cyber-criminals-and-it-blackouts

THE CLOUD

3.6 The cloud is a virtual storage space where individuals and businesses can store digital assets such as software, applications, files, and various types of data. While often confused with the internet, the cloud is actually just one part of it, specifically, the computing technology that enables access to digital resources housed in data centres. The cloud operates through highly interconnected data centres, often at a 'hyperscale', which allows for the seamless sharing of information and applications without the limitations of physical locations. Cloud computing technology enables users to access and share digital resources over networks, providing fast, secure access to data and applications across vast distances.

3.7 The last decade has been defined by the growth of cloud computing with these companies giving customers flexible access to remote servers on-demand and in accordance with their business data processing needs. According to the 2023 Global Networking Trends Report by Cisco, 92% of organisations now use two or more public cloud providers to host their workloads, which is an increase from 82% in 2022.

HYPERSCALE DATA CENTRES

3.8 In order to facilitate the growing demand for data processing, coupled with the transition to the cloud and the constant, 100% reliable access to data, the data centre market is rapidly moving towards the hyperscale model of provision as the most efficient and effective way to meet data needs.

3.9 Hyperscale data centres are associated with big data-producing cloud and internet providers such as Google, Amazon, IBM, and Microsoft and contain large volumes of servers and propriety hardware to enable cloud operations including data storage, big data processing, computing applications, digital communication along with enabling the Internet of Things, AI and 5G applications to function.

3.10 As the need for data centre storage and processing grows at a high rate, there is a trend towards data centre operators shifting to the hyperscale model of provision because it aligns with the increasing demands for high performance, scalability, energy efficiency, and cost optimisation. Hyperscale data centres are also ideal for supporting technologies like artificial intelligence, machine learning and big data analytics due to their vast processing power and storage capabilities. This trend is also reflected in data centre developers seeking data centre computing infrastructure which exceeds 50 MW of IT load. This is a marked shift towards hyperscale deployments, increasing from previous demands of approximately 20 MW that were more prominent prior to 2020.

3.11 The shift to the hyperscale data centre model has significantly improved energy efficiency in the data centre industry, driven by innovations in design, operations, and technology. One of the primary ways hyperscale data centres achieve energy efficiency is through economies of scale. These facilities are designed to house tens of thousands of servers, allowing operators to spread energy consumption more evenly across a larger number of computing units. By optimising infrastructure, hyperscale data centres reduce overall energy consumption per unit of computing power, making them far more efficient than traditional data centres. This allows hyperscale facilities to achieve lower Power Usage Effectiveness scores, which is a metric used to gauge the energy efficiency of a data centre.[5]

3.12 Although there is no universally agreed description of what constitutes a hyperscale data centres, they are sizable mission critical facilities designed to support robust, scalable applications efficiently and can often be defined by their scale, the types of occupier they attract, their suitability for delivery of cloud computing services, and their energy efficiency. The following criteria[6] are typical features of a hyperscale facility:

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5 https://journal.uptimeinstitute.com/data-center-pues-flat-since-2013/

6 There is no universally agreed definition of a hyperscale data centre. The criteria used in this report reflects the criteria presented to the Planning Inspectorate as part of the Recovered appeal at Woodlands Park landfill site land south of Slough Road, Iver, Buckinghamshire (ref: 3347353 - 9 July 2025).

- **Power capacity**: The typical power consumption in a hyperscale data centres has been defined as an average of 20-50 megawatts (MW) and often grow to 100s of MW.

- **Number of servers**: A typical definition of hyperscale suggest that they would need a minimum of 5,000 server racks, and often house up to 50,000+ server racks.

- **Size and Scale**: The scale of hyperscale buildings vary, both in terms of configuration and in lifecycle of the actual development. Within a facility, they can scale up or down rapidly to meet fluctuating workloads without compromising performance. A good example of this is retail operators who see a surge in demand due to a particular sales event.

- **Energy**: Data centres use energy to power both the IT hardware and the supporting infrastructure (e.g. cooling equipment). The data centre industry is taking sustainability very seriously, which is reflected in the 2021 Climate Neutral Data Centre Pact.[7]

- **Support for 'Big Data'**: They are optimised for processing and storing massive amounts of data, making them ideal for big data and AI applications. 'Big Data' refers to datasets that are extremely large, complex and generated at high speed, which cannot be efficiently processed using traditional computing systems. Such datasets typically arise from digital platforms, cloud services, connected devices and data-driven applications, and require high-performance, scalable computing infrastructure to store, process and analyse them effectively.

- **Resilience**: High redundancy and resilience refer to a system's ability to continue operating smoothly even if some parts fail. In a data centre, this means having multiple backups and alternative systems in place, so if one component (like a server, power supply, or network connection) stops working, another automatically takes over without causing any disruption. This setup ensures that services remain available and reliable, protecting against unexpected failures or outages, and minimising downtime for users. Network redundancy might involve multiple connections and pathways to guarantee that data can still be transmitted even if one route is interrupted.

LOCATIONAL REQUIREMENTS

3.13 Data centres have very particular locational requirements in relation to existing power and fibre infrastructure, therefore the location and clustering of existing data centres in defined areas is no coincidence. These centres are organised into logical clusters designed to ensure 100% data availability. Their proximity is dictated by the principles of physics, particularly the speed of light, ensuring they are close enough to operate as a seamlessly interconnected network. Data centres are typically sited where they have access to necessary power and other associated fibre infrastructure, and in locations where they can meet stringent customer and regulatory requirements.

3.14 The critical location drivers for data centres all relate to resilience and business performance and the ability to be able to ensure continuity of service. The key locational requirements of data centres include:

- **Land**: Data centres require sites of a sufficient size to accommodate the scale of facility needed (including space for future growth and expansion). This size requirement often means that sites within the main urban area of London cannot accommodate the scale of data centre required.

- **Power**: The operation of a data centre is reliant upon an adequate, reliable and constant source of power. The typical power consumption of a hyperscale data centres is an average of 20 to 50 megawatts (MW), which can often grow to 100s of MW. As the demand for and supply of data centres is growing

[7] https://www.climateneutraldatacentre.net/

around London, access to power is increasingly becoming a critical constraint on the ability to deliver new data centres developments in some locations.

- **Fibre**: Data centres must have access to excellent fibre connectivity and need to be located in close proximity to high-capacity fibre cable networks with several diverse fibre routes to ensure resilience.

- **Physical Characteristics**: A site selected for the development of a data centre must be physically resilient, with stable ground conditions, no risk of flooding, no exposure to industrial processes or chemical storage, and ideally situated away from a flight path.

- **Proximity to Other Data Centres**: Ideally a data centre should be located in proximity to a minimum of two other data centres within an Availability Zone, in order to provide resilience in the event of any failure at the data centre. Each data centre must be equipped with independent power, cooling and networking.

AVAILABILITY REGIONS AND ZONES

THE LONDON AVAILABILITY REGION

3.15 An Availability Region is a geographical location that includes a minimum of three Availability Zones to support cloud services. Regions are spread out all over the world, so cloud providers can reach customers on multiple continents. The London Region therefore has a critical role within the UK, but also as a global service. The Data Centre Campus will serve the 'London' data centre Availability Region. 'London' is the largest of the 'FLAP-D' major markets in Western Europe (which also include Frankfurt, Amsterdam, Paris and Dublin) and is also the largest data centre market in the world outside of Northern Virginia.

3.16 The London Availability Region is a key hub within the global cloud infrastructure network, playing a crucial role in delivering highly resilient, scalable, and low-latency cloud services to businesses. It is imperative in the UK national interest that appropriate sites are identified in the right locations to meet the needs, demands and requirements of the market as this is the location at which the market interest is directed. The creation of Availability Zones has been driven by market demand, leveraging existing infrastructure to support the growing need for resilient public cloud services. As businesses increasingly adopt cloud technologies, the market has responded by developing Availability Zones to ensure high availability, fault tolerance, and low-latency performance. This response is replicated across the globe with London the premier location in Europe.

3.17 Within the London Region, the separate Availability Zones include Slough, Hayes, Hemel Hempstead, North Acton and the London Docklands.

AVAILABILITY ZONES

3.18 With respect to resilience, this has manifested into the creation of Availability Zones. Availability Zones are localised clusters of data centres, each equipped with independent power, cooling, and networking infrastructure, located within a defined radius dictated by latency. The physical distance between data centres within an Availability Zone is limited by the speed of light to a maximum of 7 to 10 kilometres of fibre distance. This distance is typically centred at a 'parent site', which is often where a hyperscale data centre provider has first deployed internet capacity within the Zone. This requirement creates a tight radius within which additional sites for data centres can be brought forward to support the operation of an Availability Zone. If a site for a data centre is not within the 7 to 10 kilometres of fibre distance (i.e. within the Availability Zone), the likelihood of a fault or disruption is higher.

3.19 This proximity of data centres within an Availability Zone is necessary to ensure the transfer of information instantaneously between data centres to provide near 100% uptime for digital services. Participating data centres in an Availability Zone connect to each other over a high-speed, low-latency private network link. To meet these operational requirements, cloud providers deploy infrastructure across Availability Zones, which are deliberately planned clusters of data centres located within close geographic proximity. This proximity is essential to maintain ultra-low latency between facilities, enabling real-time data replication, synchronisation of workloads and instantaneous failover should one facility experience an outage. Availability Zones are therefore a fundamental architectural requirement for data centres, allowing cloud platforms to distribute computing loads across multiple independent facilities while presenting a single, seamless service to end users.

3.20 The requirement for data centres operating cloud platforms to be located within defined Availability Zones creates a strong locational dependency, meaning that suitable sites must fall within a limited geographic radius of existing cloud infrastructure. As a result, the availability of land within established Availability Zones is a critical constraint on the delivery of new data centre capacity.

SLOUGH AVAILABILITY ZONE

3.21 The site for the Project (defined in Chapter 4) is located within the Slough Availability Zone and is the most important data centre location in Europe due to its proximity to London and the key infrastructure that supports the operation of data centres, including fibre optic cables and high voltage power.[8] [9]

3.22 Slough is located to the west of London and in proximity to the Great Western Main Line and the Grand Union Canal; both of these house a network of fibre-optic cables for a number of national and international telecommunications providers that carry vital data to and from London through Slough and connect further westwards to the main sub-sea fibre optic cables that run to the United States via connection points in Cornwall and Bristol (and vice versa).

3.23 Given the accessibility of Slough to these fibre connections, the area became attractive to banking and financial trading activity, as the area was close enough to London for latency purposes (i.e. minimising any potential delays in the transmission of data related to financial markets or transactions) whilst also giving operators connectivity to overseas institutions in the United States. Slough was therefore able to offer institutions data resilience as part of their emergency and security planning, whilst also providing sufficient land for the development of new, purpose-built data centres at a scale that central London could not.

3.24 The role of Slough as a data centre hub has been further strengthened as a result of the clustering effect of data centres; as banks and financial institutions moved to Slough, infrastructure in the area improved and Slough started to attract supporting technical companies and a workforce that could service the data centres.

3.25 Historically Slough has also been an area with access to large amounts of power capacity at the levels required by data centre operators. The availability of power from the Iver substation in particular has, to date, been a key driver of data centre development in Slough, as has the power generated by the Slough Heat and Power Station located within Slough Trading Estate.

3.26 The demand for space in Slough began to rise as more organisations realised the value of tapping into such highly interconnected infrastructure leading to the development of more facilities. Today, up to 70% of the world's internet traffic flows through the data centres in Slough daily which is facilitated by the subsea cable networks. Initially all traffic flowed via New York due to the subsea cables (that are also linked to London), but in 2017 North Virginia got its first cable linking directly to Europe. The growth of Slough has developed over a 30-year period and has benefited from the development of the required infrastructure over this period of time.

[8] House of Commons Library 'Data Centres: Planning Policy, Sustainability, and Resilience' (3rd November 2025)
[9] JLL – EMEA Data Centre Report Q3 2024

UK GOVERNMENT POLICY

3.27 The national policy context for digital infrastructure and data centres has evolved significantly, reflecting their growing importance to economic growth, technological innovation, public services, national security and the UK's global competitiveness. A wide range of Government strategies, policy statements and policy reforms now consistently recognise data centres as critical infrastructure and emphasise the need for timely delivery. The below paragraphs draw together the relevant Government policy, strategies and formal statements. They demonstrate the clear direction of travel and the strength and consistency of national support for the delivery of new data centre capacity, which informs and underpins the case for the Data Centre Campus to be recognised as being of national significance.

National Data Strategy (December 2020)

3.28 The National Data Strategy establishes the Government's framework for maximising the economic, social and public service value of data across the UK economy. It recognises data as a core driver of productivity, innovation, scientific discovery and public service delivery, and sets out how government intervention is required to remove barriers to data use while ensuring security, resilience and public trust. Central to this strategy is the need to strengthen the infrastructure on which data depends, alongside skills, availability, and responsible governance.

3.29 The National Data Strategy explicitly links the growth of the data-driven economy to the need for secure, resilient and sustainable physical infrastructure, including data centres. It states that:

"The need to store and process data externally – for example, in data centres – will also become even more of a critical operating function."

3.30 It recognised that the UK is in the middle of the fourth industrial revolution and that innovation has brought an exponential growth in data and that the UK faces tangible opportunities to improve society and grow the economy by embracing data. It further recognises that data centres underpin an increasing share of economic and societal activity, noting that:

"If we get this right, data and data-driven technologies like AI could provide a significant boost to the entire economy. Data can improve productivity and provide better-quality jobs. But it can also transform our public services and dramatically improve health outcomes nationally. It can keep us safe and assist the reduction of crime, speed the journey to decarbonisation, and, used well, drive efforts to create a more inclusive, less biased society.."

3.31 The National Data Strategy proceeds on the basis that continued growth in data use will necessarily drive increased demand for external data storage and processing capacity, making data centres an increasingly critical operating function for businesses, public services and national systems. This strategy provides a clear foundation for the delivery of additional data centre capacity as a prerequisite for economic growth, innovation and effective public services.

UK Digital Strategy (October 2022)

3.32 The UK Digital Strategy sets out the Government's vision for strengthening the UK's position as a global science and technology superpower. It establishes how digital technology underpins economic growth, productivity, national security, global competitiveness and regional prosperity, and identifies the core foundations required to support long-term success in digitally intensive sectors. These foundations include digital infrastructure, energy security, skills and talent, innovation finance, and a pro-growth regulatory environment.

3.33 Within this framework, the UK Digital Strategy explicitly recognises data centres as a critical component of the UK's digital and industrial infrastructure. It states, in terms:

"To strengthen the UK's position as a Science and Tech Superpower, we need to maintain the strong foundations of our digital economy… Digital infrastructure plays a vital role in our daily lives and is the foundation of a thriving digital economy."

3.34 This strategy defines data centres as essential enabling infrastructure for the UK's digital economy and wider industrial strategy. The explicit provision of targeted public funding to support energy efficiency, waste-heat recovery and decarbonisation demonstrates a clear expectation that data centre capacity will continue to expand. This reflects an acceptance at national policy level that additional data centre development is necessary to support growth in AI, advanced digital services and innovation-led industries, and that facilitating such development is a matter of strategic economic importance.

National Cyber Strategy (December 2022)

3.35 The National Cyber Strategy underscores the importance of protecting the infrastructure upon which the UK's digital economy relies. It identifies data centres as critical national assets that must be secure, resilient and capable of withstanding cyber threats, operational failures and external shocks.

3.36 This strategy commits the Government to playing a more active role in managing cyber risk and safeguarding digital infrastructure, recognising that failures in data centre resilience could have wide-ranging consequences for public services, economic activity and national security. Crucially, the Strategy states that *"We will take a greater role in ensuring that data is sufficiently protected when processed, in transit, or stored at scale, for example in external data centres."*

3.37 This further elevates the strategic importance of data centre infrastructure and its delivery.

Labour Manifesto (June 2024)

3.38 The Labour Party Manifesto sets out the policy platform on which the current Government was elected and provides relevant context for the direction of national economic, industrial and planning policy. It places innovation, productivity growth and the commercialisation of advanced technologies at the centre of the Government's economic programme, with a stated objective of making the UK the best place to start and grow a business and ensuring that innovation is translated into scalable commercial outcomes across all regions.

3.39 In relation to artificial intelligence and digital infrastructure, the Labour Party Manifesto explicitly identifies data centres as enabling infrastructure for economic growth and innovation, stating:

"We will ensure our industrial strategy supports the development of the Artificial Intelligence (AI) sector, removes planning barriers to new datacentres. And we will create a National Data Library to bring together existing research programmes and help deliver data-driven public services, whilst maintaining strong safeguards and ensuring all of the public benefit."

3.40 The manifesto signals a clear policy intent to facilitate the efficient delivery of AI-enabling infrastructure through planning reform, long-term investment frameworks and regulatory modernisation. In doing so, it reinforces the treatment of large-scale data centre development as infrastructure of strategic economic importance, integral to national growth, innovation capacity and public-service reform, and provides further policy context supporting the case for treating qualifying data centre proposals as developments of national significance.

Ministerial Statement: "Designation of UK Data Infrastructure as Critical National Infrastructure" (12 September 2024)

3.41 In a Written Ministerial Statement on 12 September 2024, Chris Bryant, the Minister of State for Data Protection and Telecoms, designated data centres and cloud infrastructure as Critical National Infrastructure. The statement recognises that *"data infrastructure – the physical data centres and cloud infrastructure which provide the foundations of the digital economy – faces significant risks and challenges that threaten the day-to-day lives of citizens and other critical infrastructure in the UK",* marking a decisive shift in how data centres are treated within national policy.

3.42 The designation explicitly links data centres to the delivery of essential services and the UK's future economic model, particularly in the context of AI and advanced digital technologies. The Government confirms that data infrastructure *"underpins essential services that are critical to the UK economy and our way of life and will only become more vital as technologies like AI require greater data centre and cloud capacity",* clearly establishing the need not only to protect existing assets but to enable substantial new capacity in response to accelerating demand.

3.43 The statement outlines Government support for expansion of the sector. It confirms that CNI designation is intended to improve Government engagement with industry and to ensure *"the right conditions are in place to drive necessary capacity expansion to support economic growth and innovation".* This framing positions data centres as nationally strategic infrastructure whose planning, delivery and long-term operation are matters of national importance, reinforcing the case for their treatment within streamlined, nationally led consenting regimes.

Press Release: "Tech Secretary welcomes foreign investment in UK data centres which will spur economic growth and AI innovation in Britain" DSIT & The Rt Hon Peter Kyle MP (October 2024)

3.44 The October 2024 press release issued by the Department for Science, Innovation and Technology records and endorses a significant wave of inward investment into UK data centre infrastructure.

3.45 The announcement confirmed £6.3 billion of new global investment by US-based data centre and AI infrastructure firms, taking total investment in UK data centres to over £25 billion since the Labour government took office. The statement directly links data centre delivery to AI capability, noting that new facilities will provide the necessary infrastructure to train and deploy the next generation of AI technologies.

3.46 The Secretary of State explicitly frames data centres as strategic infrastructure, stating that *"Data centres power our day-to-day lives and boost innovation in growing sectors like AI."*

3.47 The release also records that the recent designation of data centres as Critical National Infrastructure was intended to provide *"the ultimate reassurance the UK will always be a safe home for their investment,"* a point reinforced by industry leaders, who described the CNI designation as *"a strong signal that data centres are of strategic importance to the UK economy."*

3.48 Government policy outlines that data centres are now regarded as nationally important infrastructure assets, essential to economic growth, job creation and AI deployment, and that facilitating their efficient delivery is a stated Government priority.

Ministerial Statement: "Building the homes we need" (12 December 2024)

3.49 The Ministerial Statement "Building the homes we need", made on 12 December 2024 by Matthew Pennycook MP, provides clear confirmation of the strategic importance of data centres and the intention to reform the planning system to accelerate their delivery. The statement explicitly identifies data centres as part of the *"engine of the UK's economy in the future"* and confirms that planning reforms are intended to make it easier to bring forward this form of digital infrastructure.

3.50 The statement confirms that the Government *will "make it easier to build laboratories, gigafactories, data centres and digital infrastructure, and the facilities needed to support the wider supply chain",* thereby recognising data centres as essential infrastructure underpinning economic growth, innovation and technological advancement. It further states that planning policy will *"specifically recognise the need to support proposals for new or upgraded facilities and infrastructure"*, with an expectation that suitable sites for data centres are identified through the plan-making process.

3.51 The statement confirmed the Government's intention to prescribe data centres as a form of business or commercial development capable of being directed into the NSIP regime. It stated that the Government will *"follow through with prescribing data centres… as types of business or commercial development capable of being directed into the Nationally Significant Infrastructure Projects consenting regime, depending on the scale of the project".* This provides a clear ministerial basis for large-scale data centre developments to be consented at the national level, reflecting their scale, economic importance and strategic role in supporting the UK's digital economy. Paragraph 6.6 provides more detail on the legislation which has been brought forward, and come into force, in respect of this proposal.

AI Opportunities Action Plan (January 2025)

3.52 The AI Opportunities Action Plan sets out the Government's strategic programme for establishing the UK as both a leading developer and adopter of artificial intelligence. It places particular emphasis on accelerating economy-wide adoption, transforming public services and securing national capability at the frontier of AI development. The plan is explicit that the UK must act at pace to avoid strategic disadvantage relative to international competitors and that success is contingent on putting in place the necessary physical, technical and regulatory foundations.

3.53 In relation to data centres, the AI Opportunities Action Plan makes clear that progress in AI is inseparable from a substantial expansion in computing infrastructure. It states that AI development depends on data centres for both model training and inference and that the Government must secure access to a sufficient supply of computational power. This requirement is articulated through a three-part portfolio comprising sovereign, domestic (privately owned) and international capacity, with domestic computational power identified as critical to economic security, investment attraction and resilience. A central policy commitment is the establishment of AI Growth Zones, recommending that Government *"establish 'AI Growth Zones'… to facilitate the accelerated build out of AI data centres,"* with data centres described in the foreword as *"the engines of the AI age."* The AI Opportunities Action Plan also links delivery explicitly to planning reform, signalling an intention to remove consent-related barriers and create a materially more enabling framework for large-scale data centre development.

3.54 Read as a whole, the AI Opportunities Action Plan treats AI-capable data centre capacity as strategic national infrastructure, essential to productivity growth, public service reform, international competitiveness and national resilience. It provides a clear policy basis for facilitating development that contributes to the domestic computational portfolio, particularly where such development can be delivered at scale and pace, reflects the locational requirements of power and land, and supports the Government's stated ambition to secure nationally significant AI infrastructure within the United Kingdom.

AI Opportunities Action Plan: Government Response (January 2025)

3.55 The AI Opportunities Action Plan: Government Response constitutes the Government's formal acceptance of the AI Opportunities Action Plan and confirms the recommendations that are being taken forward. It translates the strategic ambitions of that plan into defined delivery commitments, named programmes and indicative timelines, and embeds these within wider Government mechanisms including the Spending Review, the Industrial Strategy and the establishment of a dedicated AI Opportunities Unit within the Department for Science, Innovation and Technology.

3.56 In respect of data centres, the Government Response sets out a clear and operational delivery pathway. It commits to expanding sovereign computational capacity *"by at least 20x by 2030"* and explicitly positions private investment in data centres as a core component of the UK's national compute portfolio, referencing *"more than £25 billion of private sector investment in new UK data centres"* announced since mid-2024. The Response confirms the creation of AI Growth Zones as a principal delivery mechanism, stating that Government will "*create AI Growth Zones (AIGZs), areas with enhanced access to power and support for planning approvals, to accelerate the build out of AI infrastructure on UK soil*." It identifies Culham, the headquarters of the UK Atomic Energy Authority, as the first AI Growth Zone, with an initial capacity of 100MW and a stated intention to scale to 500MW, alongside a Spring 2025 process to secure private-sector partners and to identify further Growth Zones.

National Planning Policy Framework (February 2025)

3.57 The February 2025 update to the National Planning Policy Framework ("NPPF") provides clear and explicit national policy support for data centres as essential infrastructure required to support a modern, competitive economy. Within Section 6 (Building a strong, competitive economy), the revised NPPF introduces specific references to data centres and digital infrastructure, marking a material strengthening of policy support compared to previous iterations.

3.58 Paragraph 86 of the NPPF now states that planning policies should:

"pay particular regard to facilitating development to meet the needs of a modern economy, including by identifying suitable locations for uses such as laboratories, gigafactories, data centres, digital infrastructure, freight and logistics".

3.59 This wording places data centres on an equal policy footing with other nationally important growth sectors and establishes a clear expectation that the planning system should actively identify and facilitate suitable sites for such development, rather than treating data centres as an exceptional or ancillary use.

3.60 Paragraph 87 goes further by explicitly recognising the importance of clustering and networked infrastructure, stating that planning policies and decisions should make provision for:

"clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections)".

3.61 This policy directly reflects the operational realities of hyperscale data centres, which rely on clustering within Availability Zones, access to resilient power and digital connectivity, and the ability to expand and upgrade infrastructure over time.

3.62 Taken together, these provisions demonstrate a clear and deliberate national policy position in which data centres are recognised as integral to the UK's economic strategy and digital future, and where substantial weight is to be afforded to proposals that meet their specific locational and operational requirements.

Cyber Security and Resilience Policy Statement (April 2025)

3.63 The Cyber Security and Resilience Policy Statement sets out the Government's legislative proposals for strengthening cyber security across critical services and digital infrastructure, including additional measures under consideration to reflect the designation of data centres as Critical National Infrastructure.

3.64 This policy statement expressly links data centres' security and resilience to national and economic security, stating that*: "Data centres house and support the technology and data that meet the demands of our digital lives… underpin almost all economic activity and innovation… Disruption or compromise of data centre infrastructure can therefore have significant negative impacts on the public, businesses, and national and economic security."*

3.65 The Cyber Security and Resilience Policy Statement indicates an intention to bring data centres within the scope of the UK's cross-sector cyber security regulatory framework to strengthen and level the consistency of protection across the sector and to provide Government and the designated regulator with clearer levers to steward resilience in line with other CNI utilities. It also sets out proposed scope thresholds (including data centres at or above 1MW, and enterprise data centres at or above 10MW). In policy terms, this frames data centres as infrastructure whose resilience is a matter of national significance.

UK Compute Roadmap (July 2025)

3.66 The UK Compute Roadmap, published jointly by DSIT and UKRI in July 2025, provides a clear, quantified assessment of the UK's future compute needs to support artificial intelligence, science, innovation and economic growth. It makes clear that meeting the *"scale, speed and opportunities of the AI-enabled economy of the future"* requires infrastructure that is *"fit for purpose".* The UK Compute Roadmap positions computational power as a foundational input not only for frontier AI capability but also for wider national objectives across science, public services and growth, emphasising that demand for frontier AI compute is expected to increase *"10,000 times by the end of the decade".*

3.67 This roadmap evidences the scale, urgency and nationally strategic nature of the infrastructure challenge. It concludes that, without rapid delivery of new capacity, *"the UK risks being left behind"* and becoming *"over-reliant on foreign infrastructure",* with implications for economic competitiveness and resilience. It therefore commits to a significant programme of coordinated action and investment, including *"up to £2 billion between now and 2030 to build a modern public compute ecosystem"* and a 10-point plan designed to provide *"clarity and certainty to researchers, industry and investors".* Importantly for planning and consenting, it recognises that infrastructure *"of this scale takes years to plan and deliver*" and depends on land, power, grid upgrades and capital being brought together in a coordinated way.

3.68 The UK Compute Roadmap introduces AI Growth Zones as the Government's mechanism to unlock large-scale, strategic computational infrastructure, stating that these will *"fast-track AI infrastructure development… and unlock access to energy".* It forecasts that *"the UK will need at least 6GW of AI-capable data centre capacity by 2030 – a threefold increase"* on today, with a stated ambition for *"a core group of nationally significant sites"* each capable of at least 500MW by 2030 and at least one scaling to more than 1GW. Alongside this, the roadmap is explicit that meeting AI-driven demand sustainably will require new models for delivering the energy infrastructure for compute reinforcing the need for policy that address both compute capacity and the energy constraints that would otherwise delay delivery.

Ministerial Statement: "National Infrastructure Planning: Data Centres" (15 October 2025)

3.69 The Ministerial Statement "National Infrastructure Planning: Data Centres" (15 October 2025) confirms the Government's clear intention to ensure that the planning system effectively facilitates the delivery of data centres as essential digital infrastructure required to meet the needs of a modern economy. The statement explicitly recognises that existing consenting routes may not always provide an appropriate or timely mechanism for determining projects of national importance within the digital and data-driven sectors.

3.70 In this context, the statement confirmed that the Government had laid draft amendments to the Infrastructure Planning (Business or Commercial Projects) Regulations 2013 (**the 2013 Regulations**) to provide that data centres are prescribed projects capable of being directed into the NSIP regime under section 35 of the PA 2008. Paragraph 6.6 provides more detail on the relevant legislation which has been brought forward, and come into force.

3.71 The statement further confirmed that this change will be supported by the preparation of a new National Policy Statement for data centres, to be led by the Department for Science, Innovation and Technology. That National Policy Statement will establish the national policy framework for decision-making in respect of data centre development, including the parameters and factors relevant to determining national significance. Taken together, the Ministerial Statement, the legislative amendments, and the commitment to a dedicated National Policy Statement demonstrate a clear and deliberate Government position that large-scale data centre development is of national importance and that the NSIP regime is an appropriate consenting route for such schemes where the relevant statutory test and requirements are met.

Invest 2035: The UK's Modern Industrial Strategy (October 2024); and The UK's Modern Industrial Strategy (November 2025)

Invest 2035: The UK's Modern Industrial Strategy – Green Paper (October 2024)

3.72 Invest 2035: The UK's Modern Industrial Strategy (2024) is a green paper which sets out the government's vision for a 'modern industrial strategy'. It places digital and data-driven technologies at the core of the Government's growth agenda and explicitly identifies eight growth driving sectors including 'Digital and Technologies'. It recognises that sustained under-investment in infrastructure and planning and regulatory barriers have constrained growth, and confirms that policy interventions are required to unlock investment at scale, particularly in sectors critical to economic resilience and technological leadership.

3.73 Within this framework, Digital and Technologies is identified as a priority growth-driving sector, with the Strategy explicitly recognising the enabling role of digital infrastructure. Regarding data centres, the Green Paper is clear that:

"Further, additional data centre capacity and access to fast, secure, and reliable digital connectivity is essential to enabling economic growth and to reap the transformational productivity benefits of digitalisation and the adoption of AI."

3.74 The Green Paper sets out a modern industrial strategy that prioritises digital and data-driven technologies, highlighting the need for stronger digital infrastructure to support growth, productivity and AI adoption.

The UK's Modern Industrial Strategy (November 2025)

3.75 Building on Invest 2035, the Green Paper published last October 2024, The UK's Modern Industrial Strategy (the **"Strategy"**), presented to Parliament in November 2025, identifies digital and data-driven technologies as priority growth sectors and confirms that additional data centre capacity is essential to unlocking investment, supporting innovation and enabling the adoption of advanced technologies, including artificial intelligence.[10] Data is a driving force of the world's modern economies and investment into digital infrastructure is recognised by the UK Government as being critical to the country's future economic success.

3.76 Furthermore the Strategy recognises that *"digital infrastructure is crucial for almost every aspect of doing business and will underpin the AI revolution",* and that the UK's future economic competitiveness, resilience and security depend on significantly expanding compute capacity and the infrastructure that supports it. Data centres are therefore positioned not as ancillary development, but as foundational assets required to unlock growth across multiple priority sectors.

3.77 The Strategy commits to removing planning barriers and accelerating delivery for data centres as *"crucial commercial opportunities"*, confirming that the Government will *"increase certainty for gigafactories, laboratories, and data centres… by allowing them to 'opt in' to be designated as Nationally Significant Infrastructure Projects".* This is reinforced by a broader programme of planning reform aimed at addressing delays, uncertainty and complexity which the Strategy identifies as having constrained infrastructure delivery for over a decade. In this context, the planning system is expressly recognised as having *"often act[ed] as a blocker to growth",* with the Strategy committing to faster, more strategic decision-making for nationally important infrastructure, including data centres.

3.78 The Strategy also links data centre delivery directly to the UK's ambition to lead globally in artificial intelligence, advanced connectivity and frontier technologies, including through the establishment of AI Growth Zones to *"fast-track AI infrastructure development, support planning approvals, and unlock access to energy".* It highlights the need for substantial increases in compute capacity, investment in digital infrastructure clusters, and close alignment between planning, energy and industrial policy. Taken together, the Modern Industrial Strategy provides a clear and unequivocal policy signal that large-scale data centres are nationally significant assets, critical to economic growth, innovation and security, and that their timely delivery should be facilitated through streamlined, nationally led consenting mechanisms where appropriate.

3.79 The Strategy explicitly recognises the importance of the planning system in enabling this growth and commits to fast-tracking certain "crucial commercial opportunities", including data centres, through the planning process (see page 82 of the Strategy). In particular, the Strategy confirms the government's intention to provide greater certainty for data centres by allowing them to "opt-in" to be designated as NSIPs. This is reflective of their strategic economic importance and the scale of investment they represent. Meeting the growing demand for data services therefore requires the timely delivery of physical digital infrastructure capable of supporting sustained growth, including fast, secure and resilient connectivity and the provision of additional data centre capacity.

Delivering AI Growth Zones (November 2025)

3.80 Delivering AI Growth Zones sets out the Government's framework for accelerating the delivery of AI-capable data centre infrastructure at a scale commensurate with national economic and strategic requirements. The document identifies artificial intelligence as a priority of national importance and establishes that the provision of onshore data centre capacity is fundamental to economic growth, national security and system resilience,

[10] https://assets.publishing.service.gov.uk/media/69256e16367485ea116a56de/industrial_strategy_policy_paper.pdf

stating that *“in a world where AI will underpin our economy, onshore data centre capability is essential”.* Its purpose is to create the conditions necessary for the rapid and coordinated delivery of large-scale data centres, providing certainty to investors and enabling development in locations that best support the energy system and the wider economy.

3.81 The policy is explicit that AI Growth Zones are intended to materially accelerate the build-out of domestic AI data centre capacity and that failure to deliver such infrastructure would weaken the United Kingdom’s international competitiveness. It identifies grid access and planning delay as the principal constraints on delivery, confirming that timely access to power represents the single most significant barrier to AI data centre development. In response, the document commits to a package of interventions including the reservation and reallocation of grid capacity, accelerated connection processes, targeted planning reform and, where appropriate, the use of nationally significant infrastructure consenting mechanisms. These measures are expressly intended to unlock investment at scale, with the policy estimating that the programme could support up to £100 billion of private sector investment alongside substantial employment and regional economic benefits.

3.82 Taken as a whole, Delivering AI Growth Zones evidences a clear evolution in Government policy whereby AI-related data centres are treated not as conventional commercial development, but as strategic infrastructure requiring active and coordinated Government intervention to secure timely delivery. The framework supports proposals capable of delivering hyperscale data centre capacity alongside integrated energy solutions and progressing at pace in the national interest.

House of Commons Library: “Data centres: planning policy, sustainability, and resilience” (November 2025)

3.83 The House of Commons Library briefing Data centres: planning policy, sustainability, and resilience (November 2025) provides an overview of the role of data centres within the UK economy and the policy framework that facilitates delivery. The briefing identifies data centres as essential physical infrastructure underpinning almost all digital activity, including artificial intelligence, cloud computing, financial services and public service delivery. It confirms the Government’s designation of data centres as Critical National Infrastructure in September 2024 and situates them within a policy context that increasingly treats their provision as a matter of national importance.

3.84 The briefing reiterates that data centre capacity is primarily determined by power availability, stating that:

“A data centre’s capacity is usually expressed as the maximum power it can draw, which determines how much IT equipment it can support. The UK had approximately 1.6 gigawatts (GW) of data centre capacity in 2024.”

3.85 The majority of this is concentrated in Greater London, Europe’s largest data centre market. While new hubs are emerging elsewhere in the UK, the briefing recognises that growth remains highly constrained by access to electricity, fibre connectivity and suitable land. It notes that preliminary Government analysis suggests total UK capacity may need to increase substantially by 2030, potentially more than doubling, and that even this level of growth may still fall short of forecast demand without further policy changes, stating that:

“A preliminary estimate for the government found that the UK could have between 3.3 GW and 6.3 GW of capacity by 2030, depending on the policy environment, although this may still not be enough to keep up with demand.”

3.86 In policy terms, the briefing notes that local planning authorities in England are now expected to take account of the need for data centres when preparing local plans and determining applications, stating:

"The government is "encouraging growth in the data centre sector by addressing barriers to building. This includes … Reforms to planning policy in England that require local planning authorities to consider the need for data centres in their decision-making."

3.87 The briefing also records the Government's intention to support delivery through AI Growth Zones, with fast-track planning and infrastructure support, and confirms that data centres are now able to opt into the Nationally Significant Infrastructure Projects regime, enabling determination by the Secretary of State where projects are considered to be of national significance.

3.88 The briefing further highlights that the case for expanding domestic data centre capacity is not limited to economic growth alone. It identifies data sovereignty, cyber resilience, regulatory oversight and system reliability as key reasons for ensuring that sufficient capacity is delivered within the UK rather than relying on overseas infrastructure.

3.89 Overall, the House of Commons Library briefing reinforces the position that the timely delivery of additional data centre capacity is necessary to meet forecast demand, support AI deployment and maintain the UK's economic competitiveness and national resilience.

4.0 PROJECT DESCRIPTION AND LOCATION

4.1 The Project is proposed on land to the north of the M40 motorway in Buckinghamshire, within a strategically important location for digital and energy infrastructure. The location of the Project benefits from excellent strategic connectivity and sufficient scale to accommodate large-format infrastructure while incorporating landscape, ecological and public realm enhancements. These characteristics make it well-suited to accommodating infrastructure of the scale and nature proposed, while supporting the delivery of resilient digital infrastructure in a manner aligned with national policy objectives.

LOCATION

4.2 The Project is located at Wapseys Wood landfill site, to the north of the M40 motorway and south of the A40 Oxford Road, within the administrative area of Buckinghamshire Council (the **"Site"**). The Site lies approximately 2km west of Gerrards Cross and 2.5km east of Beaconsfield, and is shown indicatively on the plans in **Appendix A** and **Appendix C**. Appendix A depicts two related boundaries on the Site:

4.2.1 The current proposed order limits for a DCO application in respect of the Project - shown as the red line boundary (this has an area of 75.6 hectares); and

4.2.2 The extent of land over which the Applicant has secured an option for bringing forward and delivering the Project (the "**wider Site ownership area**") – shown as the blue line boundary (this has an area of 166.2 hectares). [11]

4.3 The area of the Site that will accommodate the Data Centre Campus and the Energy Centre (and certain associated development) is located along the southern boundary of the Site adjacent to the M40 (see Appendix C). The location of the Data Centre Campus (which is the subject of this qualifying request) is shown in **Appendix C** (see the area shown within the (solid) red line, which is referred to in the legend as the 'Data Centre Campus Security Perimeter'). The indicative location of each data centre building is also shown in this Appendix (see 'DC 01', 'DC 02' and 'DC 03'). Grid referencing has been overlaid on this Appendix and therefore the specific grid reference for different locations within the Data Centre Campus area can be determined. For instance, grid references 497300E and 188500N bisect 'DC 02' (data centre building 2). The size of the Data Centre Campus area as shown on Appendix C is 10.1 hectares. For context, the plan in this Appendix also identifies the proposed location of certain other important components comprising the Project, including the Energy Centre and the substation.

4.4 It is possible that land within the wider Site ownership area but outside the red line boundary may be proposed for environmental and community enhancements, including biodiversity net gain and provision of public open space. It is recognised, therefore, that it may be necessary to update the red line boundary in advance of submission of the DCO application, for example as a result of scheme development work, environmental assessment or consultation and stakeholder engagement.

4.5 The Site is situated within a semi-rural context characterised by a mix of infrastructure, former industrial land, agricultural fields, woodland and parkland. To the north of the Site lie the A40 Oxford Road, the Beaconsfield

[11] Note that the boundaries on Appendix A and Appendix C described as 'the Wider Ownership Boundary' and the 'Proposed Order Limits' in the legends depict the same respective areas. However a presentational difference to note is that the 'Proposed Order Limits' boundary on Appendix C has been converted to a dashed red line from a solid red line. This is to account for the insertion of the 'Data Centre Campus Security Perimeter' area in Appendix C – that is a solid red line – which is not shown on Appendix A.

Household Recycling Centre, the Wapseys Wood Caravan Site and the Crowne Plaza Hotel, beyond which are open fields and vegetation. The M40 motorway forms the southern boundary, with agricultural land and quarrying activity beyond.

4.6 To the east and west, the surrounding area comprises open farmland, woodland blocks and parkland, including the Registered Park and Garden of Bulstrode Park to the east. A number of designated heritage assets, including listed buildings and scheduled monuments, are located within the wider area surrounding the Site, although no designated heritage assets are located within the Site itself.

4.7 The Site forms part of a former mineral extraction and landfill complex, where landfill operations ceased in 2017. The land is currently subject to ongoing management and restoration under an Environment Agency permit. Large parts of the wider landholding have already been restored, with further restoration proposed as part of the wider strategy for the Site.

4.8 The Site benefits from a strategic transport location, with direct access to the strategic road network via the M40 (Junction 2 at Beaconsfield) and the A40 Oxford Road, and an existing vehicular access serving the former landfill operations. Beaconsfield railway station, providing mainline rail services to London and the wider region, is located approximately 4km to the northwest. Local bus services operate along the A40 corridor.

4.9 Existing infrastructure within and adjacent to the Site includes an existing gas pipeline, a 400kV overhead electricity transmission line, and energy infrastructure associated with historic landfill gas generation. The Site is not located within Flood Zones 2 or 3, and existing landform and restoration bunding provide a degree of visual containment from the surrounding road network, including the M40.

THE PROJECT

4.10 The Project comprises three interrelated components:

1. The Data Centre Campus - a data centre campus of up to three hyperscale data centre buildings (including server halls and cooling infrastructure (air cooling is proposed)), designed for an IT load of up to c.300MW across the three buildings (c.100MW each). The Data Centre Campus is the subject of this qualifying request.

2. The Energy Centre - An integrated on-site gas turbine energy generation centre (designed to be decarbonisation-ready), with a generating capacity of c.270MW to 350MW. The Energy Centre will utilise the existing on-site gas pipeline with an indicative gas connection capacity of up to c.900MW. The Energy Centre is intended to provide a resilient and reliable power supply to support the Data Centre Campus.

3. Associated development which includes development necessary to support the construction, operation and resilience of the Data Centre Campus and Energy Centre, including (but not limited to):

    a. Fuel storage and back-up generators for the Data Centre Campus;

    b. Office space and welfare accommodation;

    c. Water and oil storage areas;

    d. Battery energy storage systems (BESS);

    e. Electrical infrastructure, substations and internal distribution networks (linking the Data Centre Campus with both the Energy Centre and the electrical distribution network);

f. Waste Heat Recovery / District Heating plant;

g. Internal roads, new and enhanced vehicular access, and car parking;

h. Replacement Veolia vehicle depot;

i. Landscaping, earthworks, bunding and visual mitigation;

j. Ecological mitigation, biodiversity enhancements, open space and public amenity;

k. Utilities and services, including gas, water, drainage and communications infrastructure; and

l. Ancillary buildings, security and logistics areas, plant and facilities required for operational, safety and security purposes.

4.11 As noted above, the area of the Site that will accommodate the Data Centre Campus and the Energy Centre (and certain associated development), is located along the southern boundary of the Site adjacent to the M40.

4.12 The layout of the Project will be informed by the need to avoid development over existing landfill cells and to integrate with existing site operations where required. Elements of the existing landfill-related infrastructure and operations will need to be retained and/or accommodated for a period, including environmental monitoring requirements associated with the relevant Environment Agency permit, landfill restoration/aftercare activities, and certain existing on-site facilities (including the leachate plant and existing landfill gas energy centre) pending long-term operational arrangements.

4.13 A landscape strategy is also being developed which includes earthworks and landscaping berms to provide visual containment and to integrate the built form into the restored landform, together with habitat creation and biodiversity enhancements across the wider landholding.

4.14 The Energy Centre is being designed to be decarbonisation-ready, in line with emerging government policy and regulatory requirements for new electricity generating stations. This reflects the government's move away from carbon capture readiness towards a requirement to demonstrate a credible pathway to decarbonisation over the operational life of new plant. The current design is pursuing hydrogen conversion as the preferred decarbonisation readiness solution.

4.15 The intended operational model is that the Energy Centre will provide power to the Data Centre Campus at least in the initial phases. The Applicant is also considering a future scenario in which an off-site grid connection becomes available; in that scenario, the Data Centre Campus could transition to grid electricity and the Energy Centre could operate to provide reserve capacity and/or support the wider network during periods of peak demand, subject to the relevant consents.

4.16 The Project has been designed with consideration of its long-term lifecycle, including eventual decommissioning. The Data Centre Campus is expected to have a design life of approximately 60 years, while the Energy Centre is expected to have an operational life of at least 20 years, with the potential for extension or upgrade subject to future market and regulatory conditions.

5.0 CONSULTATION AND STAKEHOLDER ENGAGEMENT

CONSULTATION

5.1 As provided for in the PA 2008, DCO applications require a statutory period of consultation during the pre-application stage, with clear requirements for applicants. The Applicant is undertaking the following actions to ensure there is a full and compliant community consultation exercise.

5.2 An initial round of public consultation was carried out between 12th November 2025 – 8th January 2026 on a non-statutory basis in relation to the Project as a whole (i.e. including the Data Centre Campus).[12] This consultation was, however, designed and delivered in a manner that is broadly aligned with the requirements of statutory pre-application consultation under the PA 2008. As part of this, an initial programme of in-person public consultation events was held on 21, 22 and 29 November 2025 in Beaconsfield, Hedgerley and Gerrards Cross respectively.

5.3 A further round of consultation is proposed in spring/summer 2026, intended to focus on more detailed proposals and the emerging technical evidence base, and to enable the Applicant to take account of feedback as the design is refined.

5.4 The Planning and Infrastructure Act 2025 (the **"PIA 2025"**) has now been enacted and it provides for the removal of certain pre-application requirements (under section 5) in relation to DCO applications, including the duties to consult under sections 42 and 47 of the PA 2008. We understand that section 5 of the PIA 2025 is intended to be brought into force by late Spring 2026.

5.5 The Applicant is monitoring legislative developments and will keep the consultation programme and strategy under review. It will make refinements as necessary to ensure that its subsequent consultation remains legally compliant, effective, and proportionate.

5.6 The Applicant also notes the recent MHCLG consultation on streamlining infrastructure planning.[13] The outcome of that consultation, and related guidance, is awaited. However, the Applicant acknowledges the passages in the consultation document which outline the benefits of, and encourage, constructive and meaningful engagement e.g. with statutory bodies (see paragraph 30 as an example).

STAKEHOLDER ENGAGEMENT

5.7 The Applicant is actively engaging with a wide range of stakeholders at national, regional and local level to inform the development of the Project. Engagement has included and will continue to include representatives from Buckinghamshire Council, including officers, Members and senior leadership, alongside town and parish councils, community groups, conservation and heritage bodies, statutory consultees and infrastructure providers.

5.8 Early engagement with the Planning Inspectorate has commenced, including an initial pre-application meeting on 14 November 2025. A scoping opinion request is currently targeted for submission in January 2026.

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[12] https://sdcm40campus.co.uk/consultation/consultation-november-2025/

[13] https://www.gov.uk/government/consultations/consultation-on-streamlining-infrastructure-planning/consultation-on-streamlining-infrastructure-planning

5.9 Technical engagement with regulators and advisers is ongoing. This has included an Environment Agency inception meeting on 20 November 2025, a Natural England inception meeting on 24 November 2025, and a meeting on 8 December 2025 to discuss environmental permitting strategy and scope, including the role of specialist advisers. A site visit with Historic England took place on 14th January 2026.

5.10 Initial engagement with Buckinghamshire Council has also commenced, including an introductory call with the Major Developments Manager at Buckinghamshire Council on 17 November 2025, with further engagement anticipated as the Project progresses. Discussions in relation to a Planning Performance Agreement is underway.

5.11 Statutory and non-statutory consultees contacted to date include (among others):

- Town and parish councils within the surrounding area, including Gerrards Cross, Beaconsfield, Hedgerley, Chalfont St Peter, Chalfont St Giles, Seer Green, Fulmer, Burnham, Farnham Royal, Stoke Poges, Coleshill, Penn, Wooburn, Taplow and Denham;

- Statutory bodies and regulators, including the Environment Agency, Natural England, The Foresty Commission, Ofgem, Ofwat and Network Rail; and

- Utilities and infrastructure providers, including UK Power Networks, National Grid (Electricity and Gas), Cadent, Southern Gas Networks, Thames Water, Affinity Water, Anglian Water, BT/Openreach, Virgin Media, Vodafone, Zayo Group and Gigaclear.

5.12 This engagement programme will continue to expand and evolve as the Project design is refined and as the applicable consenting route is confirmed, ensuring that stakeholder feedback is captured early and meaningfully informs the development of the proposals.

6. 0 REQUEST FOR A SECTION 35 DIRECTION – QUALIFYING REQUEST

6.1 This document constitutes a ‘qualifying request’ by the Applicant for a direction by the Secretary of State that the Data Centre Campus be treated as development for which development consent is required. This Chapter presents the legislative basis for this request. In addition, a draft direction is included at **Appendix B**.

6.2 Section 14 of the PA 2008, and associated provisions in Part 3 of the PA 2008, define the types of development (and associated thresholds / criteria) that constitute a NSIP and therefore require development consent to be granted as per section 31 of the PA 2008. There is no reference in section 14(1) or the related provisions to data centres or a category of development that would capture data centres.

6.3 However, under section 35 of the PA 2008, there is an ability for the Secretary of State to give a direction for development to be treated as development for which development consent is required. A direction can only be made in response to a ‘qualifying request’. Section 35ZA(11) defines a ‘qualifying request’ as meaning a written request for a direction under section 35(1) that:

6.3.1 “specifies the development to which it relates, and

6.3.2 explains why the conditions in section 35(2)(a) and (b) are met in relation to the development.”

6.4 This request is a ‘qualifying request’. It is made in writing and specifies the development to which it relates (see Chapter 4 above, **Appendix A and Appendix C**). In addition, the analysis of the conditions in section 35(2)(a) and (b) is set out below, which demonstrates that those requirements are met for the Data Centre Campus.

6.5 The Secretary of State may only make such a direction if three statutory conditions are satisfied, as provided for under section 35(2). The relevant requirements are set out and considered below in respect of the Applicant’s qualifying request:

“*the development is or forms part of…a business or commercial project (or proposed project) of a prescribed description*” (section 35(2)(a)(ii)) -

6.6 Data centres, as a type of development, are now prescribed as a result of the Infrastructure Planning (Business or Commercial Projects) (Amendment) Regulations 2026. That legislation was made on 7 January 2026 and came into force on 8 January 2026. The Data Centre Campus is therefore capable of being directed into the PA 2008 consenting regime.

“*the development will (when completed) be wholly in one or more of the areas specified in subsection (3)*” (section 35(2)(b)) -

6.7 The Data Centre Campus will be wholly located within Buckinghamshire, England meaning this condition is satisfied.

“*the Secretary of State thinks the project (or proposed project) is of national significance, either by itself…*” (section 35(2)(c)) -

6.8 For the purpose of section 35(2)(c), the Applicant is demonstrating in this qualifying request that the Data Centre Campus is nationally significant by itself. To inform the Secretary of State's decision on whether to make a direction, the Applicant's submissions for justifying for the Data Centre Campus as being nationally significant are set out in Chapter 7. That section articulates the compelling case for national significance in respect of the Data Centre Campus. For instance, it draws on the Policy Statement which makes reference to a project being brought forward at the same time as another NSIP (i.e. the Energy Centre in this case) – this scenario is specifically listed as an example of the types of matters that the Secretary of State will consider as being relevant when determining whether a direction is made.[14]

6.9 In addition, there are several relevant procedural matters, as provided for under section 35ZA, which the Applicant would like to address to assist the Secretary of State in making their decision on this qualifying request.

6.10 Under section 35ZA(2), for business and commercial projects a direction can only be made by the Secretary of State where the request is made by certain person(s). The Applicant is making the qualifying request and it is the Applicant who proposes to carry out the development of the Data Centres Campus to which the request relates, and also will be applying for a DCO in respect of the Data Centre Campus as part of the wider Project (this satisfies section 35ZA(2)(a) and (c)).

6.11 Section 35ZA(2)(b) of the PA 2008 is also noted. Absent a section 35 direction, SDC proposes to apply for planning permission (under the Town and Country Planning Act 1990) in relation to the Data Centre Campus (referred to in section 33(1)). Initial contact has been made with Buckinghamshire Council (see paragraph 5.11) and a pre-application document was submitted to the authority in September 2025. However, given the very preliminary nature of the engagement, it is not considered necessary for the Secretary of State to give a direction under section 35ZA(3)(b).

PATHWAY TO CONSENT FOR THE PROJECT

6.12 Currently, planning permission for the Data Centre Campus must be secured through the 1990 Act. It is not an NSIP and, absent a direction from the Secretary of State, it cannot be authorised under the PA 2008. Conversely, the Energy Centre component of the Project is an NSIP automatically – see the analysis in paragraph 2.6 above.

6.13 If the Data Centre Campus is not directed-in to the PA 2008 regime, it will be necessary to proceed with submitting a DCO application for the Energy Centre and associated development and to seek a separate planning permission under the 1990 Act, as amended, for the Data Centre Campus and other related development. There may also be additional consents or approvals required in relation to the Data Centre Campus (e.g. with reference to highways works).

6.14 The Applicant is firmly of the view that a dual-consenting process is sub-optimal. It would require the Applicant to obtain multiple consents with differing timescales and involving the input of multiple consenting bodies. The Project would have different timeframes associated with securing the consents and there would be additional complexity around, for instance, structuring of the planning applications and the discharge of relevant conditions and requirements.

6.15 A fragmented approach to consenting would introduce uncertainty and risk to the Project, such that policy makers and investors would not see it as fulfilling the aims of government policy (as set out throughout this qualifying request); this is highly likely to affect the delivery and overall viability of the Project. In addition to the above, the need to obtain a number of consents would place a greater burden upon relevant stakeholders and authorities (including the local planning authority, who would have to both engage in the DCO process whilst

14 https://data.parliament.uk/DepositedPapers/Files/DEP2013-1729/Policy_Statement_By_DCLG.pdf

administering and determining a separate application for planning permission). This complex approach to consenting would also likely be challenging for the general public to follow – this may lead to reduced engagement on their part, which is something the Applicant is keen to avoid.

6.16 The Applicant is therefore making this qualifying request for a direction under section 35 of the PA 2008 for a direction by the Secretary of State that the Data Centre Campus be treated as development for which development consent is required. This is on the basis that the Data Centre Campus (by itself) is of national significance. The effect of the Secretary of State making a direction would be that the Applicant is in a position to submit a single DCO application for the Project and, if granted, a DCO would authorise the entirety of the Project.

7.0 CASE FOR NATIONAL SIGNIFICANCE

7.1 There is a huge opportunity for the UK to use its data more strategically, and to harness data to drive innovation and economic growth. The recent policy developments in the UK in relation to data centres (see the summary from paragraph 3.27) demonstrate the level of importance that the government has placed on enabling the delivery of data centres across the country.

7.2 This Chapter presents the case for national significance in respect of the Data Centre Campus with reference specifically to section 35(2)(c) of the PA 2008.

7.3 The Applicant considers that there is a compelling case in this regard from a policy perspective. When the NSIP regime was being extended to include business or commercial projects (by virtue of the 2013 Regulations), the Policy Statement was published (as set out in paragraph 1.4). The Policy Statement covers various points, to include the various "matters" that the Secretary of State will consider in determining whether a project is of national significance.

7.4 When considering whether a project is of national significance, the Secretary of State will consider "all relevant matters", including:

1. Whether a project is likely to have a significant economic impact, or is important for driving growth in the economy; *(The application of this matter is set out in Reason 4 of this Chapter);*
2. Whether a project has an impact across an area wider than a single local authority area; *(The overwhelming need for data centres set out in Reasons 1 and 2 of this Chapter and Reason 3 confirms benefits that the project delivers in addressing this need at a national scale);*
3. Whether a project is of a substantial physical size; *(The application of this matter is set out in Reason 3 of this Chapter);*
4. Whether a project is important to the delivery of a nationally significant infrastructure project or other significant development. *(The application of this matter is set out in Reason 6 of this Chapter).*

7.5 The Policy Statement also confirms that the Secretary of State will also consider any matter which the Secretary of State considers relevant to whether a direction should be made. This will include:

1. Whether a project is likely to require multiple consents or authorisations, and which, in consequence, would benefit from the single authorisation process offered by the nationally significant infrastructure regime; *(The application of this matter is set out in Reason 5 of Chapter); and*
2. Whether the project is related to a nationally significant infrastructure project being brought forward at the same time and therefore would benefit from the scheme being considered as a single application through the 2008 Act regime. *(The application of this matter is set out in Reasons 5 and 6 of this Chapter).*

7.6 Beyond the Reasons referred to above, the Applicant considers that there a various other justifications for why the Data Centre Campus is of national significance. For ease of reference, a comprehensive list of the Reasons which comprise the Applicant's case for national significance are identified in the list below before being explored in more detail:

1. Data centres are critical national infrastructure that are vital to the functioning of the UK economy and a sector in which the UK has a globally important role, as recognised by the UK Government. Data centres are the foundational physical infrastructure of the Fourth Industrial Revolution and as the UK and global economy transitions to digitisation through business, governmental and social factors, it is recognised that there is an overwhelming need for data centre development (both in the UK and in the London Region (where the Data Centre Campus is proposed to be located);

2. The exponential growth in demand has been recognised by the UK Government as overwhelming and this need must be addressed now. The Data Centre Campus represents a large contribution to meeting that national need (c.5% of next 5 years);

3. The Data Centre Campus would represent one of the largest data centre developments in the UK at c.300MW and up to c.240,000 sqm. These figures alone would put it in the top ten data centres nationwide that are built or approved. The overall maximum building footprint is six times the size of an indicative threshold for national significance (as set out in the Policy Statement).;

4. The Data Centre Campus is of national significance by virtue of the significant economic benefits that the development will deliver. The data centres comprising the Data Centre Campus represent a £2billion investment and would lead to the delivery of approximately 400 jobs equating to an estimated wage bill of £17 million - £27 million;

5. A direction under section 35 of the PA 2008 would permit the Data Centre Campus and the energy centre to be consented via a single authorisation process. The Data Centre Campus is functionally and physically linked to the energy centre (an NSIP) being brought forward at the same time, therefore the Project would benefit from being considered as a whole under a single DCO application; and

6. The energy centre that serves the Data Centre Campus qualifies in itself as an NSIP as it has a generating capacity greater than 50MW. The proposal for the energy centre to power the Data Centre Campus, and the relationship between the Data Centre Campus and the energy centre, adds significant additional weight to the case for national significance in respect of the Data Centre Campus.

1. REASON 1 - DATA CENTRES ARE CRITICAL NATIONAL INFRASTRUCTURE THAT ARE VITAL TO THE FUNCTIONING OF THE UK ECONOMY AND A SECTOR IN WHICH THE UK HAS A GLOBALLY IMPORTANT ROLE

CRITICAL NATIONAL INFRATRUCTURE - THE IMPORTANCE OF DATA CENTRES IN THE DIGITAL ECONOMY

7.7 Chapter 3 of this 'qualifying request' sets out the role and function that data centres perform, for which there is rapidly increasing demand for their services. This has been recognised by government in a number of policy documents (as set out in Chapter 3) and in Recovered Appeals determined by the Secretary of State[15][16], demonstrating their critical nature.

7.8 In summary, almost every business is now reliant upon computing equipment to run its web applications, offer services to customers, sell products, or run internal applications for accounts, human resources, and operations management, amongst numerous other things. As a business grows and IT operations increase, the scale and amount of required computer equipment also increases exponentially.

7.9 Data centres are integral to the UK's critical infrastructure, serving as the backbone of business, government, and society. The need for additional data centre capacity has increased rapidly in recent years, driven by cloud computing, artificial intelligence, data-driven decision-making and the digitalisation of public and private

[15] Court Lane, Iver, Buckinghamshire. (ref. APP/N0410/W/24/3337981) Appeal allowed in December 2024
[16] Woodlands Park Landfill Site, Iver, Buckinghamshire (ref. APP/N0410/W/22/3307420) Appeal allowed July 2025

services. They are critical to nearly all economic activity and public services. As recognised (as set out in paragraphs 3.32 – 3.34) by the Department for Science, Innovation and Technology (DSIT) the UK data economy represented 6.9% of GDP in 2022, and 76% of UK service exports worldwide are data-enabled[17]. DSIT have noted that without functioning, secure and reliable data infrastructure, the UK will be unable to innovate or compete in the global economy.

7.10 Data and the infrastructure it relies on has a direct relationship to many of the UK priorities, with DSIT recognising that the sector is especially important in achieving the ambition for the UK to be recognised as a science and technology superpower by 2030[18].

7.11 The UK Government designated data centres as critical national infrastructure ('CNI') on 12 September 2024 (as set out in paragraphs 3.41 – 3.43). In making the decision, the Government noted that the CNI designation will support the enhanced resilience of the sector to ensure that the country is a global leader for data security. It was further stated that the CNI designation will give businesses in the UK greater reassurance over the safety of their data and will assist in achieving sustainable economic growth. This designation puts data centres on an equal footing as water, energy and emergency services systems.

7.12 In summary data centres are fundamental to the functioning of modern economy and society underpinning nearly all business operations and digital interactions. The increasingly digitalised nature of the economy and society continues to enhance the importance of data centres for day to day socioeconomic function at a national level. The Data Centre Campus would provide a substantial amount of data centre capacity which represents a nationally significant proposal for critically important infrastructure in the UK.

THE UK HAS A GLOBALLY IMPORTANT ROLE IN THE DATA CENTRE SECTOR AND SHOULD SEEK TO STRENGTHEN THIS ROLE

7.13 The data centre sector has a distinct global profile and the UK data centre market is amongst the most advanced and commercially and technologically sophisticated in the world[19]. At present, the London Region data centre market is the largest in Europe and the second largest globally behind Northern Virginia in the United States[20]. However, a significant lack of data centre supply due to a combination of factors including land availability, planning and power accessibility, mean that the Region is at risk of losing its market leading position.

7.14 At a European level, there are five well-established central data centre hubs including Frankfurt, London, Amsterdam, Paris and Dublin. Collectively, these cities have become known as the FLAP-D markets ('FLAP-D') within the sector. Each city has specific Availability Regions that have developed within them, but they are also connected via subsea cables to provide international, national and regional interconnectivity.

7.15 The London Availability Region is a key hub within the European and global cloud infrastructure network, playing a crucial role in delivering highly resilient, scalable, and low-latency cloud services to businesses. Strategically located close to one of the world's leading financial and commercial centres, the London Availability Region is designed to support the needs of businesses.

7.16 London is a leading financial centre, and the growth of data centre provision was initially driven by banking and financial institutions based in the City of London and Canary Wharf that were seeking to establish 'disaster recovery' data centres in locations outside of London that would act as a back-up to their existing 'in-house' or more centrally located data storage.

[17] DSIT - Protecting and enhancing the security and resilience of UK data infrastructure – February 2024
[18] DSIT - Protecting and enhancing the security and resilience of UK data infrastructure – February 2024
[19] DSIT - Protecting and enhancing the security and resilience of UK data infrastructure – February 2024
[20] EMEA Data Centre Report Q3 2024

7.17 Over time Slough has become a key focal point for expansion primarily due to the main fibre backbone from the USA East Coast to London line which runs along Bath Road (as set out in paragraphs 3.21 – 3.26). This establishment of rich fibre connections linking subsea cables to Europe and North America, together with the global role of the UK financial services and strength of economy, meant that over the last 30 years, London has secured a dominant position among European cities.

7.18 However, as data centre need continues to grow the other FLAP-D regions have developed substantial data centre capacity which threatens London's role as the largest data centre market in Europe and second largest in the world.

7.19 The UK Government recognises that data infrastructure is a strategic asset underpinning its ambition to be a global technology leader. The National Cyber Strategy, set out at paragraphs 3.35 -3.37 identifies digital infrastructure (which includes data centres) as a foundation for "frontier industries" and commits to making the UK one of the top three global destinations for technology investment by 2035.

7.20 During the relevant consultation, the government indicated its vision for a modern industrial strategy: a 10 year plan "*to deliver the certainty and stability businesses need to invest in the high growth sectors that will drive* [the Government's] *growth mission*"[21] (paragraphs 3.72 – 3.79). Digital and technologies are a focus sector within the Strategy, considered to offer the highest growth opportunity for the economy and business.

7.21 The Strategy recognises that the UK economy is fundamentally different to where it was a decade ago, transformed by digital sectors and increasingly by advances in AI and other technologies. The sector is at the forefront of geopolitical competition, so developing its strengths can enhance the UK's security and prosperity.

7.22 This is reinforced the UK's Modern Industrial Strategy (as referenced in paragraphs 3.75 – 3.79), which highlights the UK's position as Europe's largest tech ecosystem, valued at over £1 trillion, and home to world-class research institutions and high-growth spin-outs.[22] These documents collectively signal that the UK's competitive advantage in hosting and scaling data centres is central to its industrial policy, enabling AI, cloud computing, and advanced digital services that drive exports and innovation.

7.23 The UK already hosts Europe's largest data centre market, and the Government is actively removing barriers to expansion through planning reform, accelerated grid connections, and targeted investment in compute capacity. Initiatives such as the Connections Accelerator Service and commitments to reduce energy costs for energy-intensive sectors demonstrate a clear intent to attract international capital and scale infrastructure rapidly. These measures are an attempt to position the UK as a secure and attractive environment for global operators, ensuring resilience while meeting surging demand for AI and cloud services.

7.24 It is clear from Government policy and supporting evidence that the UK holds a globally significant position in the data centre sector, and is actively seeking to strengthen this through investment, infrastructure growth, and innovation; accordingly, the proposals for the Data Centre Campus represent a major data centre development that is both aligned with and essential to delivering these national ambitions in order for the country to reap the transformational productivity benefits of digitalisation.

[21] https://www.gov.uk/government/consultations/invest-2035-the-uks-modern-industrial-strategy/invest-2035-the-uks-modern-industrial-strategy
[22] https://assets.publishing.service.gov.uk/media/6892104df15b237bf6610996/industrial_strategy_digital_and_technologies_sector_plan_accessible.pdf

DATA CENTRES ARE THE FOUNDATIONAL PHYSICAL INFRASTRUCTURE OF THE FOURTH INDUSTRIAL REVOLUTION.[23] THEIR ESSENTIAL ROLE IS DRIVING EXPONENTIAL GROWTH IN DEMAND.

7.25 The Fourth Industrial Revolution, as defined by the World Economic Forum, marks "*a fundamental change in the way we live, work and relate to one another*," driven by converging technologies that blur the boundaries between the physical, digital, and biological realms. Foundational to this transformation are data centres which are at the centre of the Fourth Industrial Revolution since they act as the physical infrastructure powering cloud computing, AI and machine learning. In essence, data centres form the tangible backbone that enables the exponential speed, scale, and complexity of modern digital services.

7.26 Without them, the key technologies the businesses, society and the economy rely on would lack the essential building blocks required to operate, interconnect, and drive innovation at a global scale. The increasingly fundamental nature of this infrastructure is driving exponential growth in demand as businesses and society continue to adapt to operate in the increasingly digitalised economy.

7.27 A report[24] by McKinsey & Co published in October 2024 stated that based upon current trends, global demand for data centre capacity could rise at an annual rate of between 19 and 22% from 2023 to 2030 to reach an annual demand of 171 to 219 gigawatts (GW25). McKinsey also suggests that a less likely, yet still possible scenario, will see demand rising by 27% annually to reach 298 gigawatts (298,000MW). They further advise that to avoid a deficit of supply compared to demand "*at least twice the data center capacity built since 2000 would have to be built in less than a quarter of the time*". McKinseys' note that demand for AI-ready capacity is the main driver of this potential deficit, however they also note that around 70% of the total demand will reside in data centres equipped to host advanced AI workloads and within cloud service providers (such as Amazon Web Services, Google and Microsoft) data centres and therefore are largely hosted on the public cloud.

7.28 The Data Centre Campus will deliver c.300 MW of capacity which is a substantial quantum of this fundamental infrastructure as set out below (see 'Reason 2') and therefore represents a nationally significant project that will help to address the exponentially growing demand for data centre infrastructure.

7.29 The UK economy is undergoing a significant transition as part of the Fourth Industrial Revolution (see above). Businesses are rapidly transitioning their day-to-day operations to the cloud, driving a significant increase in reliance on data centres. According to the Office for National Statistics[25], 69% of UK firms had adopted cloud-based computing systems and applications by 2023, up from about a quarter in 2018 – 2020, as companies migrate away from on-premises infrastructure.

7.30 The exponential growth in global data usage is driven by several key factors, including the rise of cloud computing, the proliferation of connected devices through the Internet of Things and the increasing digitalisation of industries. As the reliance of businesses, governments, and individuals on data for decision-making, communication, and operations increases, the demand for robust infrastructure to store, process and analyse this data has surged. This expanding demand is reshaping the digital landscape, driving investments in data centres worldwide and associated innovation in areas including energy efficiency, connectivity, and security. The surge in data generation highlights the critical need for resilient, scalable data centres to support these growing functions.

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[23] The World Economic Forum states that the Fourth Industrial Revolution is a technological shift merging our physical, digital, and biological worlds into one. The fast-developing technologies pushing it forward, such as artificial intelligence, genome editing, augmented reality, robotics, and 3-D printing, are promising smart solutions for intractable challenges.

[24] https://www.mckinsey.com/industries/technology-media-and-telecommunications/our-insights/ai-power-expanding-data-center-capacity-to-meet-growing-demand

[25] https://www.ons.gov.uk/economy/economicoutputandproductivity/productivitymeasures/articles/managementpracticesandtheadoptionoftechnologyandartificialintelligenceinukfirms2023/2025-03-24#:~:text=In%202023%2C%20the%20adoption%20rate,RoboticsSpecialised%20EquipmentAny%20Technology

7.31 The UK Digital Strategy (paragraphs 3.32 – 3.34) sets out that "*artificial intelligence has begun to transform our economy and day-to-day lives*," committing to position the UK as a global leader in innovation through investment in digital infrastructure and skills. DSIT defines the digital economy as "*all economic activity derived from the production of digital content, ICT goods or ICT services*," highlighting its growing share of GDP and its role in enabling 76% of UK service exports.

7.32 As set out in Chapter 3 (paragraphs 3.66 – 3.68) on 17 July 2025, DSIT jointly with UKRI, published the UK Compute Roadmap[26] - a comprehensive strategy to build a world-class compute ecosystem to support AI, science, innovation, and economic growth. This builds upon the AI Opportunities Action Plan.[27]

7.33 The UK Compute Roadmap identifies that the UK will need at least 6GW of AI-capable data centre capacity alone by 2030, which is a three-fold increase in capacity.[28] The Roadmap acknowledges the constraints of the Grid and notes the requirements to develop innovative energy solutions to alleviate burden on the grid. Overall the Roadmap quantifies the overwhelming need for data centres and demonstrates the government's commitment to supporting substantial investment and development within the sector.

7.34 In summary data centres are now unequivocally recognised as Critical National Infrastructure, fundamental to the functioning of the UK economy, the delivery of public services and national security. They underpin cloud computing, artificial intelligence, digital trade, financial systems and public administration, and are therefore essential to economic resilience, productivity and future growth. As the UK economy continues to digitalise, secure and resilient data centre capacity has become a prerequisite for national economic stability.

7.35 The UK also holds a globally significant position in the data centre sector, with the London Availability Region forming one of the most important digital infrastructure hubs worldwide. Maintaining that position is a clear Government priority, yet is increasingly constrained by shortages of land, power and deliverable capacity. In this context, data centres are not conventional commercial development but nationally strategic infrastructure, whose delivery plainly engages issues of national and international importance.

2. REASON 2 - THE EXPONENTIAL GROWTH IN DEMAND HAS BEEN RECOGNISED BY THE GOVERNMENT AS OVERWHELMING AND THAT THIS NEED MUST BE ADDRESSED NOW. THE DATA CENTRE CAMPUS REPRESENTS A LARGE CONTRIBUTION TO MEETING THAT NATIONAL NEED (C.5% OF NEXT 5 YEARS)

7.36 Reason 2 relates to the Data Centre Campus contributing significantly towards meeting an overwhelming need for substantial data centre capacity in the immediate term. The 6GW of AI capable data centre capacity identified in the UK Compute Roadmap (paragraphs 3.66 – 3.68) and the House of Commons Library briefing (paragraphs 3.83 – 3.89) equates to a three-fold increase and there is also likely to be an increase in these need figures over the next five years.

7.37 A substantial proportion of this need for data centre capacity is in the London Region as a result of the exponential growth in data usage globally and London's role within this global context.

7.38 In January 2023, JLL forecast[29] that the total demand for data centre capacity within the London Region will increase by 2,250MW to 3,100MW over the six-year period 2022 and 2027, with a central forecast of 2,665MW.

7.39 In the first of the appeals at the former Woodlands Park Landfill Site[30] (reference APP/N0410/W/22/3307420) the Planning Inspectorate and the Secretary of State accepted the need case for data centre capacity presented

[26] https://www.gov.uk/government/publications/uk-compute-roadmap/uk-compute-roadmap
[27] https://www.gov.uk/government/publications/ai-opportunities-action-plan/ai-opportunities-action-plan
[28] https://www.gov.uk/government/publications/uk-compute-roadmap/uk-compute-roadmap
[29] JLL – EMEA Data Centre Report Q3 2024
[30] Woodlands Park Landfill Site, Iver, Buckinghamshire (ref. APP/N0410/W/22/3307420) Appeal allowed July 2025

by JLL for the London Region and the Slough Availability Zone, concluding that there is significant and substantial demand for new data centre capacity.

7.40 The forecasts produced by JLL and corroborated by CBRE, Knight Frank, and Savills form the basis of the assessed need for additional data centre capacity. The table below utilises the previous JLL figures for the London Region and projects them beyond the previous forecast, this time to 2030, applying a central annual growth rate of 20% to reflect historic realised growth in the London market, while recognising that other FLAP-D markets have experienced faster rates of expansion (typically between 15% and 25%). This methodology has been accepted by the Planning Inspectorate and Secretary of State in the recent decision at Abbots Langley, and the second appeal at Woodlands Park Landfill Site (reference APP/ N0410/W/24/3347353) and has been projected forward an additional year to take account of the time that has passed since this evidence was generated. It is noted that JLL's 2025 Global Data Centre Outlook[31] has been published in the intervening period and continues to suggest that this growth rate is realistic.

Table 1: Forecast annual need for extra data centre capacity in the London market areas (MW of IT load)

	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Upper Range	288	374	459	552	651	758	910	1,092	1,310	6,394
Lower Range	210	273	335	403	475	553	664	796	955	4,637
Average	249	324	397	478	563	656	787	944	1132	5,530

7.41 A five-year projection to 2030 has been adopted, reflecting standard forecasting practice aimed at maintaining accuracy within a reasonable timeframe. However, based on prevailing market trends and third-party research, it is anticipated that demand will continue significantly beyond this period. The International Data Corporation ('IDC') has significantly revised its Global DataSphere projections[32]. The IDC's estimate for 2028 now stands at 394 zettabytes, which is more than double its earlier 2023 estimate of 181 zettabytes. The revised IDC figure is not incorporated into the demand projections set out above, but its implications strongly support the conclusion that the underlying need for data centres will increase beyond previously identified levels and is not short term.

7.42 The assessment of data centre need was presented at the second appeal at Woodlands Park Landfill Site with the case accepted Buckinghamshire Council in Core Document CD.H6A Statement of Common Ground (SoCG). With reference to the identified need for development, the SoCG note, amongst other things:

a. Para 8.13 - It is agreed that there is an identified need for the proposed development and the appeal proposals would contribute towards meeting that need.

b. Para 8.14 - It is agreed that the scale of need is overwhelming, it is urgent, it is of national importance and that data centres are critical infrastructure.

7.43 In granting planning permission for the data centre at Woodlands Park Landfill Site, the Secretary of State for Housing, Communities and Local Government agreed with the "*undisputed position that need within the Slough Availability Zone (SAZ) has continued to rise significantly…*" (para 17) and that "*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*" (para 18).

7.44 In addition, evidence relating to data centre need has also been prepared by Knight Frank in support of the proposed development of a data centre at Court Lane[33] Industrial Estate in Buckinghamshire. The planning application was subject to a Public Inquiry in June 2024, with the appeal allowed and planning permission

[31] JLL – Global Data Centre Outlook - 20205
[32] The International Data Corporation Global Datasphere Forecast 2024 – 2028 (May 2024)
[33] APP/N0410/W/24/3337981 – Court Lane Industrial Estate, Court Lane, Iver

granted by the Secretary of State on 6 December 2024. The Proof of Evidence on data centre need identified a known requirement of 1,700 MW of additional capacity within the West of London Availability Zone from 2022 to 2027. The forecast need provided by Mr Beard of Knight Frank was not contested by Buckinghamshire Council at the Appeal.

7.45 In granting planning permission for the data centre at Court Lane, the Secretary of State for Housing, Communities and Local Government recognised that there is a clear lack of sites available to meet the demand for data centres in the Slough and Hayes Availability Zones and "*that failure to meet this need could have significant negative consequences for the UK digital economy*". The Secretary of State attributed significant weight to the need for new data centres and considered that the proposed development at Court Lane Industrial Estate would make a significant contribution towards meeting the need for data centres both in the UK and in the Slough Availability Zone.

DATA CENTRE NEED IN THE SLOUGH AVAILABILITY ZONE

7.46 The Slough Availability Zone accounts for approximately 65 % of the total capacity across the whole of London Region at present. Applying the assumption that Slough will continue to have this market share into the future, this translates to a need in the Slough Availability Zone of around 2,499 MW to 3,429 MW (with a central estimate of 2,964 MW) of additional required capacity between 2025 and 2030. These are set out in Table 2 below.

Table 2: Forecast annual need for extra data centre capacity in the Slough Availability Zone (MW of IT load)

	2022	2023	2024	2025	2026	2027	2028	2029	2030	Total
Upper Range	187	243	298	359	423	493	592	710	852	4,157
Lower Range	137	177	218	262	309	359	432	517	620	3,031
Average	162	210	258	310	366	426	512	614	736	3,594

7.47 As with the total London Region forecasts there is a degree of uncertainty in such estimates and the figures in Table 2 do not include an allowance for the historical shortfall in the preceding years. However, the figures in Table 2 point clearly towards a very substantial level of demand for new capacity in the Slough Availability Zone over the period to 2030.

7.48 The projected forecast is based upon the assumption that the Slough Availability Zone will maintain its current market share of 65% of the London Region, whilst noting that there have been substantial planning permissions granted in the wider London Region that indicate that other Availability Zones, including the London Docklands, Hemel Hempstead and North Acton, for example, that are also growing to support the architecture of cloud computing. However, even if the Slough Availability Zone were to see its market share of new data centre capacity fall for example to 55%, this would still result in there being a very substantial additional need for data centres within the Zone.

7.49 Addressing this demand in the Slough Availability Zone is essential for the UK to retain its competitive edge and appeal to data centre investments, as well as to uphold the country's leading position in the European digital economy. Due to the magnitude of the growth required, hyperscale data centres are the primary way to effectively meet this requirement.

7.50 The projected need for IT capacity represents a requirement to build multiple hyperscale data centres to support the demonstrated demand. Whilst it should not be strictly confined to a numerical exercise, it is important to note that if we assume each hyperscale data centre will have an IT Load capacity of 100MW, then within the Slough Availability Zone alone, based upon the projection of need, a further 25 to 30 will be needed in the next 5-year period in addition to the Data Centre Campus. The UK Government recognises this overwhelming and substantial need for data centre capacity and is reflected in various policy and strategy documents. The

Secretary of State accepted the need for data centre capacity and their location requirements in approving the planning appeals at Court Lane[34], Woodlands Park[35] and Abbots Langley[36]. As set out in detail in chapter 3 this has also manifested itself in numerous ministerial statements, national strategies and policy documents.

7.51 Overall, the Data Centre Campus would provide c.300 MW of data centre capacity which represents 5% of the identified need at a national level. The Data Centre Campus therefore represents a substantial contribution to meeting the established data centre need by 2030, due to the unique nature of the proposals for onsite energy generation i.e. the Energy Centre (this is set out in Reason 5 below.)

7.52 At a regional level the Data Centre Campus would deliver approximately 14% of the identified need within the Slough Availability Zone. Given that the UK and specifically London is the second largest data centre market in the world, a 14% increase in capacity constitutes a nationally significant delivery of capacity. As this would improve London's position within the global context of the FLAP-D markets and the US, the proposals in relation to the Data Centre Campus are of national significance.

7.53 Data Centres are most commonly powered via a direct connection to the grid. However, with growing demand for data centres another major barrier to delivery is the availability of power and the increasing demand for grid connections which is acknowledged by the government. The 'UK Infrastructure: A 10 Year Strategy'[37] confirmed that the size of the connections queue has grown to 753 GW (at the end of 2024), which has resulted in connection delays of up to 15 years.

7.54 The Government's awareness of the issue has resulted in engagement with Ofgem and a reform to the grid connections process. The UK Compute Roadmap acknowledges the constraints of the grid and notes the requirements to develop innovative energy solutions to alleviate burden on the grid. As set out in (paragraphs 3.66 – 3.68 and 7.33). This roadmap quantifies the overwhelming need for data centres and demonstrates the government's commitment to supporting substantial investment and development within the sector.

7.55 To meet the established and overwhelming demand for data centre capacity in this location and to bring forward the Data Centre Campus in a timely manner, the Data Centre Campus needs to be supported by its own energy source. This would allow the Data Centre Campus to become operational significantly ahead of any grid connection procurement and alleviate the burden of data centres on the grid. Whilst a grid connection at a future date will be explored, the proposals comprising the Project allow the timely delivery of much needed data centre capacity and present a unique and rare proposal for a power sufficient Data Centre Campus.

7.56 Overall the proposals for the Project as a whole represent a unique opportunity to deliver significant data centre capacity to meet the overwhelming need. Whilst mitigating any impacts on the already burdened grid by providing its own power source therefore ensuring the need is met within the urgent and immediate timescales that are evident from the widely accepted need evidence presented above.

[34] APP/N0410/W/24/3337981 – Court Lane Industrial Estate, Court Lane, Iver
[35] APP/N0410/W/22/3307420 - Woodlands Park Landfill Site, Iver, Buckinghamshire
[36] APP/P1940/W/24/3346061 – Land off Bedmond Road, Abbots Langley
[37] UK Infrastructure: A 10 Year Strategy – June 2025:
https://assets.publishing.service.gov.uk/media/6853c5db99b009dcdcb73649/UK_Infrastructure_A_10_Year_Strategy_Web_Accessible.pdf

3. REASON 3 - THE CAPACITY AND PHYSICAL SIZE OF THE PROJECT – THIS WOULD REPRESENT ONE OF THE LARGEST DATA CENTRES IN THE UK

CAPACITY

7.57 The Data Centre Campus is significant in scale comprising three hyperscale data centres each providing 100MW of IT capacity providing a total capacity of c.300MW. There are a limited number of data centres or campuses of this scale in the UK as demonstrated by the list below:

1. Humber Tech Park (permitted in August 2024) – 384 MW data centre in North Lincolnshire.
2. DC10 / Equinix (permitted in January 2025) – 320 MW data centre in Hertfordshire.
3. Vantage (operational) – 90 MW data centre in Newport.

7.58 These are a small list of some of the largest operational / consented data centres in the UK. The proposed c.300 MW Data Centre Campus would be one of the largest data campuses in the country compared to existing and consented data centre facilities and therefore it follows that it should be considered as nationally significant.

7.59 Furthermore, the proposed c.300MW would deliver a substantial quantum of the established overwhelming need. The c.300 MW would deliver approximately 5% of the UK's data centre need as identified in the Roadmap, as set out above. This is a significant percentage for a single project to contribute. This is a compelling reason for why the Data Centre Campus should be regarded as nationally significant as it addresses an established need on a national scale. A significantly wider scale than the South Bucks Local Authority area, this is confirmed as a reason for a project being considered nationally significant as set out in the Policy Statement referenced in paragraph 1.4.

PHYSICAL SIZE

7.60 In addition to the capacity, the physical scale of the Data Centre Campus in floor area (and associated infrastructure) is substantial. The Data Centre Campus comprises three hyperscale data centre buildings, each accommodating three data halls. At the current stage of the design process, it is anticipated that the Data Centre Campus alone (i.e. the hyperscale data centre buildings) will have an overall maximum building footprint of up to approximately 63,000 sqm and a total floor area of approximately 240,000 sqm.

7.61 The Data Centre Campus represents a major development in terms of its physical size. The Applicant notes the Policy Statement in this regard. It indicates that while size itself will not be the determining factor, the expectation is that requests will be for projects that are of "substantial size". Some guidance on an indicative threshold is provided for in the Policy Statement:

"For example, the Secretary of State would not normally expect to receive requests for construction projects where the gross internal floorspace to be created by the project is less than 40,000m2"

7.62 With regard to the application of the reference to 'construction projects', the Policy Statement states:

"The draft Regulations published today prescribe the types of business and commercial projects that are capable of using the regime. They are construction projects in a range of fields that are potentially nationally significant, including offices, research and development, manufacturing, distribution, sport and tourism, and mining projects."

7.63 Evidently there is no reference to data centres because this Policy Statement preceded the inclusion of data centres as a prescribed project (see paragraph 6.6). Nonetheless, it is the Applicant's interpretation of the paragraph set out above that data centres would be caught by the reference to 'construction projects'. On that basis, the indicative threshold for a relevant project to be nationally significant according to the Policy Statement is *40,000m2.*

7.64 The Data Centre Campus has a total floor area of approximately 240,000 sqm – this is six times the indicative threshold referred to in the Policy Statement. The physical size (and capacity) of the Data Centre Campus would put it in the top ten nationwide of data centres that are built or approved. The Applicant is of the view that this is demonstrative of a clear and compelling reason for why the Data Centre Campus should be considered as nationally significant.

4. REASON 4 - THE PROJECT IS OF NATIONAL SIGNIFICANCE BY VIRTUE OF THE SIGNIFICANT ECONOMIC BENEFITS IT WILL DELIVER

7.65 The proposed Data Centre Campus is expected to deliver substantial Socio-Economic Benefits as a result of the nationally significant level of capital investment required for the Data Centre Campus alone, which is expected to be approximately £2 billion. The Project as a whole (i.e. the Energy Centre and the Data Centre Campus) is expected to have capital investment of approximately £3 billion.

7.66 This would constitute one of the ten largest infrastructure projects (by value) in the UK in 2025. As set out by Barbour ABI[38] who publish a league table of the top construction projects by value, the top project of 2025 (as published in October 2025) was the London Gateway Port Building Extensions with a value of £3 billion. The second largest project by value was Inch Cape Offshore Windfarm in Scotland with a value of £1.5 billion, demonstrating the very rare and significant nature of £2 billion projects, with only four construction projects exceeding a value of £1 billion in 2025.

7.67 As a result of this substantial investment the Data Campus element of the project alone, will create a significant range of economic benefits both during construction and operation, as well as to the wider region and Buckinghamshire area.

THE PROJECTED CONSTRUCTION BENEFITS

7.68 The scale of the investment and the proposed development itself is expected to lead to a substantial number of jobs during the construction period. Whilst socio economic statistics have not yet been prepared for this Project, a recently submitted (July 2025) outline planning application for a (circa 150MW / 55,000 sqm) data centre at Pinewood Studios in Buckinghamshire (PL/25/2076/OA) includes a Socio Economic Assessment[39] prepared by Nicol Economics. The assessment anticipates a range of 4,400 – 5,100 person years of direct construction employment. Given that the scale of the proposed Data Centre Campus is almost double the Pinewood Studios proposals we would anticipate the project would provide in excess of the stated range.

7.69 The assessment also identifies the construction phase of the Pinewood Studios project to lead to £350 million - £450 million of direct extra construction sector Gross Value Add (GVA) cumulatively.

7.70 These findings are broadly consistent with other approved data centres in the wider area. For example, a site at Iver Heath in Buckinghamshire received planning permission in July 2024 for a (90 MW / 64,000 sqm) data centre (ref. PL/24/2130/FA). This application was supported by a data centre need and economic impact assessment, prepared by Montagu Evans. This predicted that the development would require 2,308 person years of labour to complete and deliver a GVA of approximately £305 million based on the construction works alone.

[38] https://barbour-abi.com/top-100-construction-projects-uk/
[39] Economic Benefits Report: Pinewood South Data Centre – Nicol Economics – June 2025 – Application ref. PL/25/2076/OA

7.71 This demonstrates the substantial construction operation required to deliver projects of this nature. the proposal for the Data Centre Campus is also significantly greater in scale than the examples used (due to the limited number of c. 300MW examples), which is indicative of the project being able to deliver benefits over and above the stated examples which would be of upmost national significance.

OPERATIONAL BENEFITS

7.72 At an operational level the Data Centre Campus is expected to continue to deliver a nationally significant scale of economic benefits. The Data Centre Campus is expected to provide approximately 400 full time jobs, the majority of which will be highly skilled and well paid, owing to the fact that they are in data centres rather than traditional industrial processes. Evidence from the recent Nicol Economics report suggests that the current average annual wages paid for a full time job at the data centre are likely be in the range of £40,000 to £70,000 (and higher for specialist skills).

7.73 This would equate to an annual wage bill for the expected 400 jobs of approximately £17 million to £27 million.

7.74 The substantial wage bill and capital intensive nature of the project is also expected to generate substantial GVA as a result of the Data Centre Campus. The Nicol Economics report predicted the 150MW data centre at Pinewood studios to deliver between £125 million and £163 million in direct GVA generated by the data centre. Again, the substantially larger scale of the proposed project is likely to give rise to benefits in this region as a minimum, and in reality is likely to exceed this meaningfully.

7.75 In summary the project will deliver wider economic and social benefits by forming part of a regional cluster of data centres, which strengthens the area's ability to attract and retain a highly skilled workforce. It will create local employment, training, and education opportunities, while generating significant indirect benefits across the economy. According to TechUK, every job in data centre operations supports between 1.4 and 2.5 additional jobs in related sectors, amplifying the positive impact on growth and productivity. Alongside the substantial level of investment associated with the project the scheme will lead to economic benefits that are of substantial national significance. With reference to the Policy Statement, the Applicant considers that the Data Centre Campus is likely to have a significant economic impact. It will also be important for driving growth in the economy.

5. REASON 5 - THE DIRECTION WOULD PERMIT THE DATA CENTRE CAMPUS AND THE ENERGY CENTRE TO BE CONSENTED VIA A SINGLE AUTHORISATION PROCESS

7.76 The Policy Statement (paragraph 1.4), provides that the following will be relevant matters for the Secretary of State to consider when deciding whether a direction should be made under section 35 of the PA 2008:

"whether a project is likely to require multiple consents or authorisations, and which, in consequence, would benefit from the single authorisation process offered by the nationally significant infrastructure regime;

whether the project is related to a nationally significant infrastructure project being brought forward at the same time and therefore would benefit from the scheme being considered as a single application through the 2008 Act regime."

7.77 The Data Centre Campus is functionally and physically linked to the delivery of the Energy Centre (which is itself an NSIP). However, as explained under the 'Pathway to Consent for the Project' in Chapter 6, if the Data Centre Campus is not directed-in to the PA 2008 regime, it will be necessary to proceed with submitting a DCO application for the Energy Centre and associated development and to seek a separate planning permission under the 1990 Act, as amended, for the Data Centre Campus and other related development. There may also be additional consents or approvals required in relation to the Data Centre Campus (e.g. with reference to highways works).

7.78 The Applicant is firmly of the view that a dual-consenting process for the Project is sub-optimal. It would require the Applicant to obtain multiple consents with differing timescales and involving the input of multiple consenting bodies. The Project would have different timeframes associated with securing the consents and there would be additional complexity around, for instance, structuring of the planning applications and the discharge of relevant conditions and requirements.

7.79 A fragmented approach to consenting would introduce uncertainty and risk to the Project, such that policy-makers and investors would not see it as fulfilling the various aims of government policy (as set out in paragraphs 3.27 – 3.87); this is highly likely to affect the delivery and overall viability of the Project. In addition to the above, the need to obtain a number of consents would place a greater burden upon relevant stakeholders and authorities (including the local planning authority, who would have to both engage in the DCO process whilst administering and determining a separate application for planning permission). This complex approach to consenting would also likely be challenging for the general public to follow – this may lead to reduced engagement on their part, which is something the Applicant is keen to avoid.

7.80 With regard to the Policy Statement extracts above, it is clear that the Project currently requires multiple consents or authorisations and therefore would benefit from the single authorisation process provided for in the NSIP regime. The Data Centre Campus is functionally and physically linked to the Energy Centre (an NSIP) being brought forward at the same time, therefore the Project would benefit from being considered as a whole under a single DCO application. This adds further evidence to the case for national significance.

6. REASON 6 - THE ENERGY CENTRE THAT SERVES THE DATA CENTRE CAMPUS QUALIFIES IN ITSELF AS A NSIP AS IT HAS A GENERATING CAPACITY GREATER THAN 50MW

7.81 As set out in Reason 5, the Data Centre Campus is functionally and physically linked to the delivery of the Energy Centre.

7.82 However, as things stand, planning permission for the Data Centre Campus must be secured through the 1990 Act. Absent a direction from the Secretary of State, it cannot be authorised under the PA 2008. Conversely, the Energy Centre component of the Project is an NSIP automatically under the PA 2008 – see the analysis at paragraph 2.6 above.

7.83 With reference to the Policy Statement, the following is listed as a "relevant matter" that the Secretary of State will consider in respect of a section 35 request:

"*whether a project is important to the delivery of a nationally significant infrastructure project or other significant development*."

7.84 In addition, as noted in Reason 5, the Secretary of State will consider any matter which the Secretary of State considers relevant to whether a direction should be made, to include:

"*whether the project is related to a nationally significant infrastructure project being brought forward at the same time and therefore would benefit from the scheme being considered as a single application through the 2008 Act regime*."

7.85 The Energy Centre already constitutes a NSIP, therefore given its interdependence with the Data Centre Campus, it follows that the combined scheme (i.e. the Project) should be treated as a single NSIP. The Data Centre is not a standalone commercial development; its viability and purpose are inseparable from the dedicated energy provision required to support an IT load of this magnitude. The proposals for the Energy Centre, which is nationally significant (c.270MW to c.350MW), to power the Data Centre Campus, and the relationship between the Data Centre Campus and the Energy Centre, therefore adds significant additional weight to the case for national significance in respect of the Data Centre Campus.

8.0 CONCLUSION

8.1 This document constitutes a qualifying request for a direction under section 35 of the PA 2008 the Data Centre Campus to be treated as development for which development consent is required. The request is made by the Applicant, specifies the development to which it relates, and explains why the relevant statutory conditions are met.

8.2 The Data Centre Campus, which would be wholly located within England, is a prescribed form of commercial development capable of being directed into the NSIP regime following the coming into force of the 2026 Regulations.

8.3 This qualifying request demonstrates that the Data Centre Campus is of national significance in its own right. The case for national significance is compelling and multi-faceted. Data centres are now recognised by UK Government as Critical National Infrastructure and are foundational to the UK's digital economy, national security and public services. The exponential growth in demand for data centre capacity, driven by cloud computing, artificial intelligence and data-driven activity, has been expressly acknowledged by Government as overwhelming and urgent.

8.4 The proposed Data Centre Campus would deliver up to c.300MW of IT load, representing approximately 5% of the identified national need over the next five years and around 14% of the projected requirement within the Slough Availability Zone in the same period. It would therefore make a substantial and meaningful contribution to meeting an established national shortfall in capacity. In both capacity and physical scale, the Data Centre Campus would be among the largest data centre developments in the UK, with a gross internal floorspace of approximately 240,000 sqm, far exceeding indicative thresholds referenced in the Policy Statement relating to business and commercial projects.

8.5 The proposed Data Centre Campus is expected to deliver very significant economic benefits of national importance. It represents an investment of approximately £2 billion, placing it among the largest infrastructure projects by value in the UK. The construction and operation of the Data Centre Campus would generate substantial employment, high-value gross value added, and wider economic benefits, reinforcing the UK's position as a leading global hub for digital and AI-enabled industries.

8.6 The Data Centre Campus is functionally and physically linked to the Energy Centre, which itself constitutes a NSIP by virtue of its generating capacity exceeding 50MW. Neither component can be delivered independently of the other. This interdependence is a matter expressly identified in the Policy Statement as relevant to the exercise of the section 35 power and provides strong additional justification for treating the Project as a single, nationally significant scheme.

8.7 Absent a section 35 direction, the Project would be subject to a fragmented and sub-optimal dual-consenting route, involving a planning application under the 1990 Act for the Data Centre Campus and related development and a DCO application for the Energy Centre (and associated development). Such an approach would introduce unnecessary complexity, duplication and risk, undermining policy objectives to accelerate the delivery of nationally important infrastructure and increasing burdens on decision-makers, consultees and the public. By contrast, a single DCO would provide a coherent, transparent and efficient consenting framework for the Project as a whole.

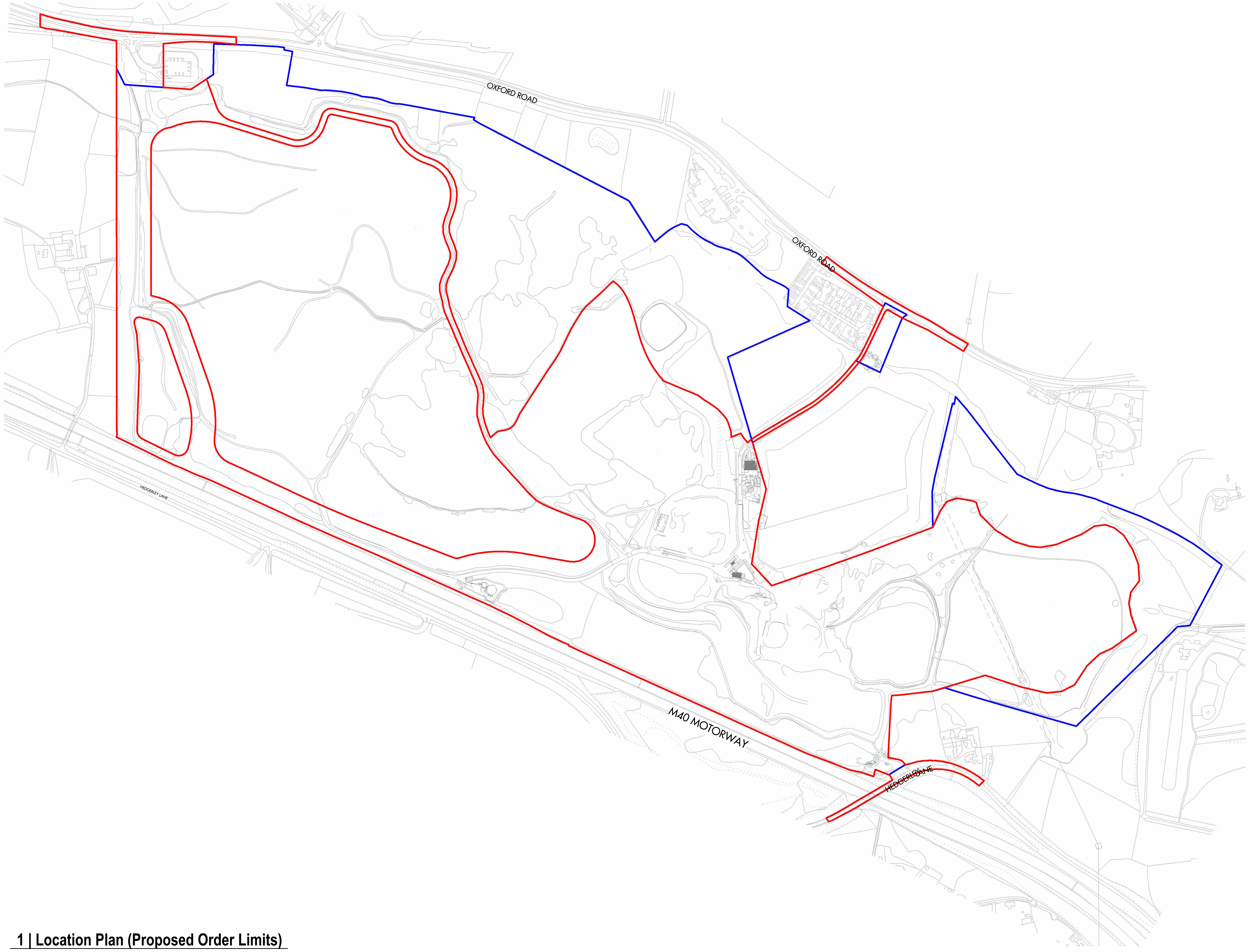
8.8 The Government has made clear, through legislation, ministerial statements and national policy, its intention to remove planning barriers for major economic and digital infrastructure projects, including data centres of appropriate scale. The ability for qualifying data centre developments to opt-in to the NSIP regime through the section 35 mechanism is a deliberate and recent policy choice, intended to facilitate the timely delivery of infrastructure that is critical to the UK's economic growth, technological leadership and national resilience.

8.9 For all of these reasons, the Applicant respectfully submits that the statutory tests for a section 35 direction are clearly met and that there is strong policy support with reference to the Policy Statement. There is a compelling case for the Data Centre Campus to be considered of national significance. The making of a direction would enable the Project to be brought forward as a single, integrated DCO application, providing the most appropriate, efficient and policy-aligned route to consent for infrastructure of this scale, nature and national importance.

APPENDIX A

SITE PLAN

A1 - Do not scale



1 | Location Plan (Proposed Order Limits)

SCALE: 1 : 5000

General Notes

1. Do not scale from this drawing. All dimensions indicated are in millimetres unless otherwise stated. Validate all measurements on site.
2. Any discrepancies between the drawings and other documents should be brought to the attention of the engineer.
3. This drawing is not an installation drawing. It is the Contractors responsibility to make final coordinated installation shop drawings.
4. The contents of this drawing shall be read in conjunction with the current revisions of Architectural, Civil, Structural, Mechanical, Electrical, Security, Telcoms drawings and all relevant sections of the specifications.

50000 0 50000 100000 150000 200000

SCALE: 1:5000

N

LEGEND

WIDER OWNERSHIP BOUNDARY

PROPOSED ORDER LIMITS

Rev	Details	By / Chkd / App	Date

Client

SDC Capital Partners
817 Broadway, 10th Floor
New York, NY 10003
www.sdccapitalpartners.com

Lead Consultant / MEP Designer

Black & White Engineering
Generator Studios
Newcastle, NE1 2LA
United Kingdom
www.bw-engineering.com

Architect

Reid Brewin Architects
22 Rue de Palestro
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France
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Civil Engineer

The Print Rooms
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t: +44 207 403 6111
london@terrellgroup.net

Structural

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Landscaper

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Henley on Thames,
Oxfordshire,
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t: 01491 641524
info@scarpla.co.uk

Project Title

WAPSEY

Drawing Title

Location Plan (Proposed Order Limits)

Project Status

Proposed Order Limits

Discipline

ARCHITECTURE

Status Code

Project Number

P20267

Scale @ A1

1:5000

Revision

Drawing Number

SDCM40-RBA-SW-XX-DR-A-0001

Project — Originator — Functional Breakdown — Spatial Breakdown — Form — Discipline — Number

APPENDIX B
Draft Direction

DIRECTION BY THE SECRETARY OF STATE FOR HOUSING, COMMUNITIES AND LOCAL GOVERNMENT UNDER SECTION 35 OF THE PLANNING ACT 2008 RELATING TO THE DATA CENTRE CAMPUS COMPONENT OF THE SDC M40 CAMPUS PROJECT, ON LAND AT WAPSEYS WOOD LANDFILL SITE, BUCKINGHAMSHIRE

By email to the Secretary of State dated 21 January 2026, Montagu Evans on behalf of Slough Holdings UK Limited ("the Applicant") formally requested that the Secretary of State exercise the power vested in the Secretary of State under section 35(1) of the Planning Act 2008 (as amended) ("the Planning Act") to direct that the proposed Data Centre Campus (“the Proposed Development”) forming part of the SDC M40 Campus Project, as set out in the Applicant’s formal request, be treated as development of national significance for which development consent is required.

The Secretary of State has made a decision within the deadline set out in section 35A(4) of the Planning Act and wishes to convey that decision.

Having considered the Applicant’s formal request and the details of the Proposed Development, the Secretary of State is satisfied that:

- the Proposed Development is a business or commercial project of a prescribed description for the purposes of section 35(2)(a)(ii) of the Planning Act and regulation 2(a)(i) of the Infrastructure Planning (Business and Commercial Projects) Regulations 2013 (“the Regulations”), consisting wholly or mainly of the construction of buildings or facilities for use for the purposes of one or more of the matters in the Schedule to the Regulations, namely paragraph 10 of the Schedule;
- the Proposed Development is within England; and
- The Applicant's formal request constitutes a "qualifying request" in accordance with section 35ZA(2) of the Planning Act.

The Secretary of State notes that the Proposed Development comprises the following as detailed or referred to in the Applicant’s qualifying request:

a data centre campus of up to three hyperscale data centre buildings (including server halls and cooling infrastructure (air cooling is proposed)), designed for an IT load of up to c.300MW across the three buildings (c.100MW per building).

Having considered the details of the Proposed Development against the criteria in the Policy Statement for the extension of the nationally significant infrastructure planning regime to business and commercial projects, and all other relevant matters, the Secretary of State is of the view that the Proposed Development by itself is nationally significant for the following reasons:

- the proposal would be likely to have significant economic impact;
- the proposal is important in driving growth in the economy;
- the proposal would have an impact on an area wider than a single local authority area;
- the Proposed Development is of a substantial physical size and scale;

- the Proposed Development is important to the delivery of a nationally significant infrastructure project;
- the Proposed Development would benefit from the application being determined through a single, unified consenting process provided by the Planning Act and remove the need to apply and the uncertainty of applying for separate powers and consents; and
- in addition, the Secretary of State considers that the Proposed Development is related to a nationally significant infrastructure project being brought forward at the same time and therefore would benefit from the scheme being considered as a single application through the 2008 Act regime.

The Secretary of State considers that if the details of the Proposed Development change, before submitting any application to the Planning Inspectorate, the Applicant may wish to seek confirmation from the Secretary of State that the development that is the subject of the proposed application is the same as that for which the Direction is hereby given.

THE SECRETARY OF STATE HEREBY DIRECTS that the Proposed Development is to be treated as development for which development consent is required. Any application for development consent for the Proposed Development may also include any matters that may properly be included in a development consent order (in accordance with section 120 of the Planning Act) including ancillary matters (section 120(3)) and associated development (within the meaning of section 115(2) of the Planning Act).

This Direction is given without prejudice to the Secretary of State's consideration of any application for development consent which is made in relation to all or part of the Proposed Development.

[NAME] [TITLE]

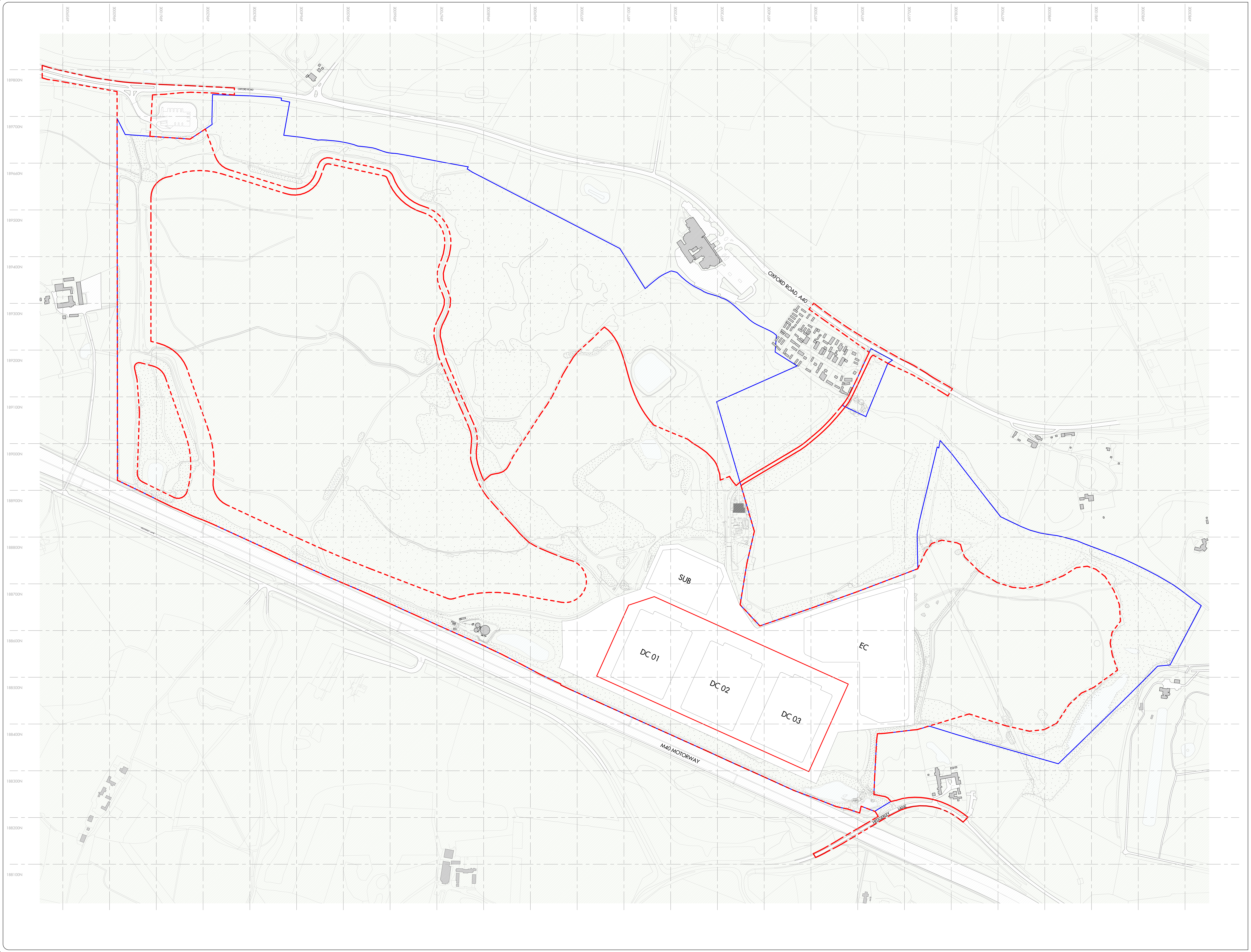
Authorised to sign on behalf of the Secretary of State

[DATE]

APPENDIX C

SITE LOCATION PLAN

A0 - Do not scale



General Notes

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4. The contents of this drawing shall be read in conjunction with the current revisions of Architectural, Civil, Structural, Mechanical, Electrical, Security, Telcoms drawings and all relevant sections of the specifications.

25000 0 25000 50000 75000 100000
SCALE: 1:2500
N

LEGEND

- APPLICANT'S OWNERSHIP BOUNDARY (166.2 ha)
- PROPOSED ORDER LIMITS SDC M40 CAMPUS (75.6HA)
- DATA CENTRE CAMPUS SECURITY PERIMETER (10.1HA)

DC DATA CENTRE
EC ENERGY CENTRE
SUB SUBSTATION

Rev	Details	By / Chkd / App	Date
P01	Pre-Application	RA / TK / JH	24/02/2026

Client
SDC Capital Partners
817 Broadway, 10th Floor
New York, NY 10003
www.sdccapitalpartners.com

Lead Consultant / MEP Designer
Black & White Engineering
Generator Studios
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RC9 1AT
t: 01491 641524
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Project Title
SDC M40 Campus

Drawing Title
Site Location Plan Section 35A Clarification

Project Status
Pre Application

Discipline	Status Code
ARCHITECTURE	**S4**

Project Number	Scale @ A0	Revision
P20267	**1:2500**	**P01**

Drawing Number
M40C-RBA-SW-XX-SK-A-102016
Project — Originator — Functional Breakdown — Spatial Breakdown — Form — Discipline — Number

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