

Public Bill Committee on the Planning and Infrastructure Bill  
House of Commons  
Palace of Westminster  
London  
SW1A 0AA

[By email to: [scrutiny@parliament.uk](mailto:scrutiny@parliament.uk)]

25 April 2025

Dear Public Bill Committee,

**Re: Planning and Infrastructure Bill: call for evidence**

We are writing to you with comments on behalf of Sequence (Iver) UK Ltd, responding to the call for evidence for the Planning and Infrastructure Bill (the Bill). We welcome the Bill as part of the Government's plans to reform the UK's planning system to unlock development and deliver growth.

**Summary**

We welcome the Government's early recognition that data centres are the engines of the digital economy, crucial to kickstarting economic growth, delivering skilled jobs and productivity gains in every part of the country.

Although data centres are not explicitly mentioned in the Bill, we welcome its provisions that would support their construction in the UK. We welcome the changes to streamline the Nationally Significant Infrastructure Projects (NSIP) consultation requirements, the reduced opportunities for judicial review and the updated conditions for electricity licences, which could make it easier for data centres to connect to the grid. These changes represent an important step-change, key to driving data centre development across the UK.

However, to ensure that the Bill effectively unlocks data centre development across the UK, we would like to see the Government go further. We recommend that:

1. The Government designates all major data centre projects in the UK as NSIPs.
2. Data centres are specifically accounted for in the contents of the spatial development strategies by updating Clause 12D to add
  - a. To subsection 4 to read: A spatial development strategy may specify or describe infrastructure, **including data centres and clusters of data centres**, the provision of which the strategic planning authority considers to be of strategic importance to the strategy area for the purposes of –
  - b. A new subsection 5 (c): an amount or distribution of employment and employment supporting space, including data centres, the provision of which the strategic planning authority considers to be of strategic importance to the strategy area.

**About Sequence (Iver) UK Ltd**

Sequence (Iver) UK Ltd is a joint venture between Valore Group and Astra Partners. Established in 2014, Valore Group is an owner, investor, and operator of real estate throughout the UK and Europe. Astra Partners are a London-based private equity firm specialising in real estate and digital infrastructure investment throughout the UK and Europe.

Sequence (Iver) UK Ltd will shortly be submitting an application to Buckinghamshire Council to consider the Sequence Park data centre following our pre-application submission on 8 October 2024. Sequence Park will support the Government's mission to kickstart economic growth by generating up to an estimated £1 billion in GVA for the UK economy, sustain 190 permanent high-skilled jobs in

Buckinghamshire and Greater London, and meet a significant proportion of the identified need within the neighbouring availability zones.

The Sequence (Iver) UK Ltd team has extensive experience in identifying suitable sites and delivering Digital Infrastructure/Data Centre projects across Europe. The partners' investments include the Kildare Innovation Campus (KIC) on the outskirts of Dublin, which received planning permission for the regeneration of a former Hewlett-Packard manufacturing facility into one of Europe's leading science, technology, and innovation campuses. The KIC project, valued at €7 billion and providing 3,500 jobs, is an exemplar scheme which will include hyperscale data centres, two large Deep Tech Facilities, a technology scale-up hub and energy centre that combines a high-quality and sustainable design with a range of economic, social and environmental objectives.

### ***NSIPs and CNI***

We welcome the changes implemented by the Bill that simplify and streamline the NSIP regime including the provisions that remove the right to appeal for cases deemed totally without merit at the oral permission hearing. Given their designation as Critical National Infrastructure (CNI), we believe data centres should automatically be considered under the NSIP regime. Therefore, while we welcome the statement from Minister for Housing and Planning Matthew Pennycook MP that the Government will be introducing secondary legislation later this year to "prescribe data centres, gigafactories and laboratories as types of business or commercial development capable (on request) of being directed into the Nationally Significant Infrastructure Projects consenting regime"<sup>1</sup> we believe the Government should go further and automatically designate major data centre projects under the NSIP consenting regime.

One of the most significant barriers to data centre development in the UK is at the local planning level. Currently, under the Planning Act 2008, data centres do not qualify as a project that could be considered an NSIP<sup>2</sup>. However, as announced by the Government in September 2024, data centres are now designated CNI. We believe that, in line with the Government's desire to further UK infrastructure growth and investment, it should designate all major UK data centre projects as NSIPs. This would allow for data centre projects to be expedited through the NSIP regime, avoiding potential major delays in the planning consent process at a local level for projects that would benefit the UK as a whole.

### ***Spatial Development Strategies***

We welcome the inclusion of Spatial Development Strategies within the Bill, and specifically, the point that Spatial Development Strategies "may specify or describe infrastructure the provision of which the strategic planning authority considers to be of strategic importance to the strategy area for the purposes of – a) supporting or facilitating development in that area, b) mitigating, or adapting to, climate change, or c) promoting or improving the economic, social or environmental well-being of that area."

However, we would like to see this clause go further to explicitly state that data centres are a piece of infrastructure that a Spatial Development Strategy should include. We would like to see the following added to Clause 12D, subsection 4: "A spatial development strategy may specify or describe infrastructure, ***including data centres and clusters of data centres***, the provision of which the strategic planning authority considers to be of strategic importance to the strategy area for the purposes of –".

The addition to this clause will mean data centre projects will form a key part of a local area's growth plans, either at a local authority level as part of the plan-making process or at a strategic authority level as part of the devolution agenda.

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<sup>1</sup> <https://questions-statements.parliament.uk/written-questions/detail/2025-01-14/23808>

<sup>2</sup> <https://www.legislation.gov.uk/ukpga/2008/29/part/3>

Furthermore, concerning Clause 12D, subsection 5, we are calling for an additional paragraph C to be added. This should read “(c) an amount or distribution of employment and employment supporting space, including data centres, the provision of which the strategic planning authority considers to be of strategic importance to the strategy area.”

Given the potential data centres and data centre clusters have for adding to employment levels, it should be explicit in the Bill that data centres’ employment figures should automatically be included in consideration when a planning authority is formulating a spatial development strategy. Looking at our proposed hyper-scale data centre Sequence Park, as an example, the proposed development is set to provide 190 permanent high-skilled jobs in Buckinghamshire and Greater London. It will cement Buckinghamshire’s position as a digital and data hub, attracting and retaining high-tech industries that rely on data processing, such as the life sciences and technology industries, creating further high skilled job opportunities for the local area.

Furthermore, the Government has identified the digital and technology industries as key mechanisms for delivering growth, particularly through developing innovation clusters such as through the newly proposed AI Growth Zones. Therefore, we welcomed the inclusion of provision 87 in the revised National Planning Policy Framework (NPPF), which states that “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for: a) clusters or networks of knowledge and data-driven, creative or high technology industries; and for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of these industries (including data centres and grid connections).”

AI and digitalisation are the heart of the Government’s plans to spark economic growth through a productivity revolution. The UK can only reach its AI leadership and growth ambitions if the Government secures the foundations of the digital economy by building more data centres. Additionally, while data centres have high energy demands, their processing capacity is key to delivering a low carbon sustainable transition. Data centres can further facilitate the future renewable transition of heat, transport and power systems – enabled by smart grid systems to improve energy resilience, energy efficiency and create a more reliable power system and supporting infrastructure.

However, due to the specific requirements for data centres, there are a finite number of locations that meet the specific energy and connectivity criteria. Therefore, in line with the revised NPPF, local authorities must consider the benefits of data centre clusters in ‘Availability Zones’ that can support data centres. This will help to create innovation hubs which have the potential to deliver local benefits, including job creation, enhanced digital and energy infrastructure and sustainability initiatives.

For example, the Thames Valley area, including Buckinghamshire, is central to the UK’s data centre provision thanks to its infrastructure and related ability to support high growth industries such as life sciences and technology. However, there are limited suitable sites within the high-demand Slough Availability Zone (SAZ). This is a fact acknowledged by Buckinghamshire Council as part of its response to the West London Technology Park (WLTP) appeal. The Council has recognised that some of the necessary 1730MW capacity will need to be in the SAZ which would equate to 12-15 new hyperscale data centres by 2027 in the SAZ. Within this context, Sequence Park is uniquely placed to deliver a significant proportion of that need while minimising its impact on the local environment. The Sequence Park site is directly adjacent to the Iver Substation meaning the connecting cables will be out of sight and the surrounding land will be undisturbed. Together with the proposed neighbouring WLTP data centre, it would be prudent to create a data centre cluster on the last major site next to a substation. If delivered together, this would not only provide a significant proportion of that unmet need within the SAZ, but further attract investment and highly skilled jobs. The availability of sites with the requisite attributes to accommodate a data centre is finite and, as such, it is important that a strategic view is taken in selecting the optimal locations to meet the significant demand.

In conclusion, we wish to reiterate our broad support for the proposed planning reforms in the Planning and Infrastructure Bill but request that the Government goes further by smoothing the path to data centre development.

We would welcome your consideration of our comments on the proposed reforms to the Bill and we would be pleased to assist with any queries.

Yours faithfully,



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