SEER GREEN PARISH COUNCIL'S RESPONSE TO THE COMMUNITY CONSULTATION BY SDC M40 CAMPUS (SLOUGH HOLDINGS)

Seer Green Parish Council welcomes the opportunity to respond to the SDC M40 Campus Community Consultation. However, the lack of detail in the SDC documentation precludes us from fully informed comment and we therefore reserve the right to comment fully following the submission by SDC M40 Campus of the DCO to the Planning Inspectorate.

Although the proposed Campus falls outside our parish boundary, its close proximity to Seer Green means that our residents will be directly affected by the proposed construction of the Data Centre.

We recognize the need for new technology to be encouraged, but the density of data centres either constructed, approved but not built or – as in this case – in the application process in South Buckinghamshire and the adjoining Slough data centre hub is unacceptable.

1. Green Belt considerations: although the proposed site is a brownfield site, this sits within the Metropolitan Green Belt. The Green Belt is afforded protections against harmful development and its openness, amongst other factors. The size and mass of the proposed Data Centre will have an extremely detrimental effect on the Green Belt's openness and will be able to be seen from a great distance. A building of this size is inappropriate development in that setting. Additionally, such a large application site contributes further to the estimated loss of 130-180 hectares of Green Belt land in South Buckinghamshire to data centres.

2. Noise, vibration and dust pollution: Our own village and surrounding settlements (Jordans, Gerrards Cross, Hedgerley) will be directly impacted by the noise, vibration and dust pollution emanating from the site during the construction of the data centre – a total period of 9/10 years. There is no mention of air quality or noise pollution monitoring for Seer Green in the documentation, which is concerning. There are no decibel levels stated for the operation of the data centre once completed, either for day-to-day running or in worst-case scenario.

3. Size and mass: three buildings of approximately 40m height, plus additional plant superstructure and a total of 216 stacks (of undetermined height) for back-up generators is an overpowering construction in a rural and residential setting. No amount of screening or vegetation (which would take 15 years to come anywhere near maturity) would compensate for the visual intrusion into the countryside. Our residents value our rural setting and the peace and tranquility we enjoy and our concern is that this will be irreparably damaged by the proposed data centre.

4. Power: SDC has been informed that there is no capacity in the National Grid to power the proposed data centre until at least 2040. The disappointing response from the applicant has been to construct an Energy Centre that would operate for at least ten years by burning fossil fuels. Far from reducing the nation's carbon emissions, the SDC M40 Campus would add significantly to them and to the release of toxic chemicals and particulate into the atmosphere. This contravenes the Government's legally-binding undertaking to achieve net zero emissions by 2050.
   The height of the generator stacks, which has not been decided, seeks to find a 'lesser of two evils' solution – the lower the stack, the greater the concentration of toxic emissions, the higher the stack the greater the area affected by those emissions. Even in the event of connection to the Grid taking place after 2040, this will mean the laying of 8km of cables under existing highways, with all the associated disruption.

5. Water: the information given in the documentation is confusing. Some sections state that air-cooling will be utilized with limited peak requirements utilizing water 'where necessary'; other sections state that water cooling could be used. In both cases, the ***aim*** would be to use 'raw water' and harvested rainfall. No-where does it state the provenance of the 'raw water' and given the small amount of rainfall in the area over the past year, harvested rainwater seems optimistic. These two options remain an 'aim' rather than a reality, which gives rise to concerns regarding water supply. Although Affinity Water can supply a small amount of daily water to the construction site, Thames Water cannot supply any water at all. The application site is situated within an area of acute water stress, but no forecasts of likely required water volume are provided.

   The application site also sits on the periphery of a Principal Aquifer, within Source Protection Zone 3 and close to Source Protection Zone 1. There are concerns that the construction phase carries the risk of rupturing the cell liners of the landfill site and contaminating the aquifer.

6. Roads and access: The applicant acknowledges that there will be a significant increase in heavy traffic to the site during the construction phase and proposes mitigations such as widening the A40 (which is erroneously stated as a dual carriageway), staggering deliveries (always subject to any other traffic constraints) and night deliveries, which will have a detrimental impact on the Crowne Plaza Hotel, caravan site, residents of Pyebush Lane and nearby residential properties. The current access road, the only access point until the secondary access is built, already suffers from water run-off, spilling mud onto the A40 in the winter months. The addition of many heavy vehicles will only exacerbate the problem unless this is mitigated on-site at an early stage.

7. Odour, ground conditions and mitigation: one of the main concerns of our residents is the odour that will inevitably escape from the landfill site during excavation. In Seer Green we already experience strong odour emanating from the site many times in a year and the odour extends across the M40 southwards as well as north to Jordans and Three Households, not to mention Gerrards Cross. This is without any construction on the site. Mitigation will need to be very carefully thought-through and a comprehensive management plan put in place.

8. Ecology and Biodiversity Net Gain: The application site is home to a variety of rare and endangered species – Great-Crested Newts and ground-nesting birds (skylarks and ringed plovers) as well as reptiles, badgers and insect life. With a construction site as large as this, operating for ten years before completion, wildlife will suffer a catastrophic impact. Even if the landscaping is implemented it will take decades for wildlife to make any form of return, if ever.

   The applicant states that more land will need to be sought in order to achieve even the minimum 10% Biodiversity Net Gain to mitigate the almost-certain disappearance of wildlife and habitats. The construction of birdwatching hides and swift towers are always to be welcomed, but if there are no birds to be watched, it renders this a pointless exercise.
   The application site is also well within the Burnham Beeches SAC, a nationally important – and protected – ecological asset. There does not appear to be any authoritative study or information provided on the possible detrimental impact on Burnham Beeches or Hodgemoor Woods SSSI (situated approximately 2km to the north) of the construction of the data centre or subsequent toxic emissions from the site.
   Additionally, footpaths, bridleways and access will be unavailable for use during the construction phase and residents will be deprived of this amenity for some ten years.

Summary: the documents pack and Environmental Report in particular raise more questions than they answer. Seer Green Parish Council therefore cannot support the proposed SDC M40 Campus based on the information provided.