

Penn Parish Council

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Delivered By: email to [sdcm40campus@planninginspectorate.gov.uk](mailto:sdcm40campus@planninginspectorate.gov.uk)

9 June 2026

Dear Planning Inspectorate,

SDC M40 Campus EIA Scoping Consultation Response

Thank you for your email dated 29<sup>th</sup> April 2026 inviting Penn Parish Council to comment on the above-mentioned consultation. We have reviewed the Environmental Impact Assessment (EIA) Scoping Report for the proposed SDC M40 Campus development. We have significant concerns over its viability, technically, time lines and its integration and connection to utilities/services. Our view is it is vital environmental impacts including Water, Traffic and Health be brought fully into scope of the Environmental Impact Assessment rather than being excluded. We comment as follows:-

### **Key Issues of Concern**

- **Water Resources & Flood Risk** — despite being in Flood Zone 1, the site's historic landfill use, chalk aquifer sensitivity, nearby Source Protection Zones, and uncertain future water demand require full assessment. The site lies over a Principal Aquifer and within a Source Protection Zone, with areas of medium–high surface water flood risk. Local chalk aquifers that supply nearby towns are already at full capacity, and national research warns of significant future water shortages and declining summer river flows due to climate change. Combined with major new housing growth in Beaconsfield, these pressures increase risk to groundwater, drainage, cooling demand and utility infrastructure.

It is our view, Water Resources and Flood Risk should remain included in the EIA.

- **Traffic and Movement** — the proposal to exclude traffic impacts is unjustified and quite unbelievable, given the scale of construction, HGV movements, proximity to the M40/A40/A355, existing congestion, and cumulative development pressures. This needs to be re-considered. We suggest as a minimum it would therefore appear reasonable for the EIA to include:
  - i. a full construction traffic assessment;
  - ii. a cumulative traffic assessment;
  - iii. an assessment of impacts on the strategic and local highway network;
  - iv. consideration of the impacts on nearby settlements and residential communities; and
  - v. an assessment of impacts on Public Rights of Way, local amenity and road safety.

It is our view Traffic and Traffic Movements should remain included in the EIA

- **Human Health** — potential cumulative effects from noise, air quality, heat dispersal from air-cooling systems, lighting, and long-term industrialisation should remain within the EIA. Switching to air-cooling could create additional heat released into the atmosphere, yet the applicant claims this has no health impact, we are especially concerned about the heat generated by the power station/facility. This is especially relevant for nearby residents, the Wapsey's Wood Caravan Site, and the Crowne Plaza Hotel, who may be directly affected by increased ambient heat.

It is our view the impacts on Human Health should remain included in the EIA

- **Cumulative Impacts - defining the study area** — the scoping report acknowledges the site's relationship with nearby settlements including Beaconsfield, Gerrards Cross and Hedgerley Green (Sections 2.1.5–2.1.6). Despite this, it is unclear which will be included in the study area, or the methodology, despite major growth pressures in the Beaconsfield to Gerrards Cross corridor, significant housing developments and the importance of the nearby Burnham Beeches SSSI and Chilterns National Landscape.
- **Green Belt Development** — the application acknowledges the development lies in Green Belt and industrial nature of the proposal will significantly affect openness, settlement separation, and landscape character. Our view is this requires more explicit assessment, currently is down-played, whereas this proposal is for major development in the Green Belt. We would also like to see the impact on Burnham Beeches SSSI and Chilterns National Landscape clearly reported.
- **Night-time Lighting** — the report considers the visual daytime impacts, a detailed methodology for assessing sky glow, 24-hour lighting, and cumulative night-time effects is also needed.
- **Energy Centre Assumptions** — the reliance on future hydrogen conversion (the timing of which is uncertain) combined with uncertain grid connection timescales lacks evidence and the combination risks underestimating long-term environmental impacts. The picture is sketchy, especially the deliverability of supporting regional hydrogen infrastructure which could be as late as 2049, dependency on future electricity grid connections, the timing of which is unknown, for which one could read possibly undeliverable. The implementation time frames and the commercial and technical viability of the whole plan seem ambitious. What is the fallback operational if hydrogen conversion does not occur within the anticipated timeframe, given the plant's life expectancy is just 20-25 years? We note mini-nuclear power plants maybe an alternative source.
- **Natural Gas Supply** — no detail is provided on gas sourcing, pipeline capacity, carbon emissions, resilience, gas delivery or risks to the existing network, or highways all of which require full life-cycle assessment.

Your sincerely,

*Nicole Webster*

Clerk to Penn Parish Council