

Environmental Services

Infrastructure Decisions and Applications Service

Planning Inspectorate
c/o Quadient,
69 Buckingham Avenue,
Slough,
SL1 4PN

Reference Number: EN0110030/PL/26/03590/DCO
08/09/2026

Dear Sir/Madam,

DESCRIPTION: *Consultation under The Planning Act 2008 (as amended) and The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (The EIA Regulations) Regulations 10 and 11 for an Order Granting Development Consent for the SDC M40 Campus*

LOCATION: Wapseys Wood, Oxford Road, Gerrards Cross,

Thank you for consulting Affinity Water on the proposed development. Affinity Water is the statutory undertaker responsible for public water supply in this area. Having reviewed the Scoping Report, we provide the following comments relating to **water resources, water supply infrastructure, and the protection of public water supply abstractions**.

Water Demand and Resource Considerations

The proposed development comprises a major data centre campus within an area designated as being under serious water stress. Given the scale and nature of the proposal, Affinity Water considers that the Environmental Impact Assessment (EIA) should include a robust assessment of operational water demand and its implications for local water resources and public water supply infrastructure.

At this stage, insufficient information has been provided to assess the anticipated water demand associated with the development or the capability of existing infrastructure to accommodate the proposal. No Water Cycle Study or detailed Water Strategy has been provided to demonstrate how operational water requirements will be met whilst minimising impacts on public water supplies.

Affinity Water therefore expects the following information and assessments to be included within the Environmental Statement and supporting documents submitted as part of the Development Consent Order (DCO) application:

- Operational potable water demand.
- Cooling water requirements and proposed cooling technologies.

- Water efficiency measures.
- Opportunities for rainwater harvesting and greywater reuse.
- Alternative non-potable water supply options.
- Fire-fighting water requirements and resilience measures; and
- Potential impacts on local water resources and existing customers.

These assessments will be required to enable Affinity Water to fully understand the impacts of the proposed development and determine whether reinforcement works, new infrastructure, or other mitigation measures may be necessary. In the absence of this information, Affinity Water cannot confirm that adequate water resources or network capacity are available to support the development.

Until this information has been provided and assessed, Affinity Water cannot determine the extent to which network reinforcement or other infrastructure improvements may be required to support the development. Any future connection would be subject to available network capacity; agreement of a suitable technical design and completion of any reinforcement works identified through the development assessment process.

Protection of Public Water Supply Assets

Whilst we acknowledge that the proposal remains at the scoping stage, Affinity Water has concerns regarding the location of the development and the potential risk to public water supply assets.

The site is located within an Environment Agency Source Protection Zone (SPZ) associated with Affinity Water abstraction boreholes used for public water supply. The site is also situated within an area of historic landfill. As such, there is potential for construction and operational activities to adversely affect groundwater quality and abstraction operations.

Affinity Water expects a detailed hydrogeological and groundwater risk assessment to be submitted with the DCO application and assessed within the Environmental Statement. This should demonstrate that the development would not adversely affect groundwater resources, Source Protection Zones, public water supply abstractions, or associated infrastructure.

The EIA should assess, as a minimum, should assess risk to:

- Geology and designated aquifers
- Groundwater quality
- Changes to groundwater levels and current flow characteristics

- And consider:
 - Mobilisation of known (e.g. from the historic landfill) and unknown contaminants
 - Generation of contamination from construction (e.g. foundations), construction operations (e.g. storage and handling of materials), and continuing operational activities of the completed site (discharge of cooling water blowdown)
 - Drainage strategy (e.g. infiltration techniques through contaminated areas and opening of pollutant pathways from site operations)

We need to ensure we have been provided with as much information as possible for our review, at relevant stages, as issues arising from the development can cause significant risk to public water supply.

Further Engagement

We ask that developer contact the Developer Services team to discuss the water demand requirements as quickly as possible, to avoid impact to our operations and delays to the development. For water supply, infrastructure protection and mains diversions please contact our Developer Services Team via the "My Developments Portal."

<https://affinitywater.custhelp.com/> or aw_developerservices@custhelp.com at the earliest opportunity to avoid delays.

For planning, groundwater protection, and environmental assessment matters, please contact:

planning@affinitywater.co.uk

Thank you for your consideration.

Yours sincerely,

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