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Objection to the proposed Junction 24 Data Centre and the proposed scope and methodology of the Environmental Impact Assessment (EIA)

Application reference: 26/04732/SCOP

Applicant: Orbital Data Centres Ltd

Overview

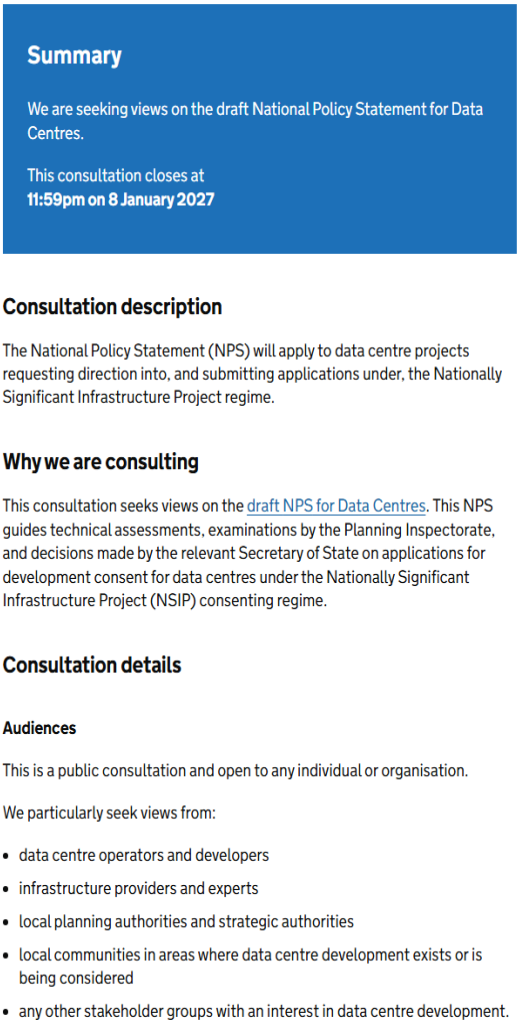
Action for Enfield's Future (AfEF) wishes to object strongly to the proposed Junction 24 Data Centre development on designated Green Belt Land which fulfils the objective, as set out in the National Planning Policy Framework, of preventing urban sprawl by keeping land permanently open.

We are also concerned about the limited scope of the proposed Environmental Impact Assessment (EIA) which doesn't provide for a sufficiently comprehensive assessment of the development's potential environmental impacts.

We are not opposed to Data Centres, they are important infrastructure and support many aspects of our day-to-day lives. We know they supply important services: cloud computing, storage and server hosting across many domains, professional, government and personal… but the current boom in data centres isn't simply about ordinary demand.

The Government has identified that to *"protect national interests, and remain competitive"* with the global AI market, there must be rapid expansion of domestic capacity. And whilst AI could and does help address some of our biggest challenges it is currently unplanned, lacks scrutiny, democratic debate, community involvement, policy framework or regulation. We're risking a barrage of unchecked data centre development, ignorant of the consequences for the environment and the future wellbeing of communities affected, like Enfield.

Our first concern is the bigger, national picture and broad questions.



Summary

We are seeking views on the draft National Policy Statement for Data Centres.

This consultation closes at
11:59pm on 8 January 2027

Consultation description

The National Policy Statement (NPS) will apply to data centre projects requesting direction into, and submitting applications under, the Nationally Significant Infrastructure Project regime.

Why we are consulting

This consultation seeks views on the draft NPS for Data Centres. This NPS guides technical assessments, examinations by the Planning Inspectorate, and decisions made by the relevant Secretary of State on applications for development consent for data centres under the Nationally Significant Infrastructure Project (NSIP) consenting regime.

Consultation details

Audiences

This is a public consultation and open to any individual or organisation.

We particularly seek views from:

- data centre operators and developers
- infrastructure providers and experts
- local planning authorities and strategic authorities
- local communities in areas where data centre development exists or is being considered
- any other stakeholder groups with an interest in data centre development.

We welcome the government's Draft National Policy Statement for Data Centres (NPS) and accompanying open national consultation which closes on 8th January 2027. The consultation and the draft policy are pertinent to this consultation as explained below:

1. The developer intends to build the data centre on designated Green Belt Land. There's a strong probability that it will ultimately become a data centre project "*requesting direction into, and submitting applications under, the Nationally Significant Infrastructure Project regime*" (see left).

2. Furthermore, the NPS will, following consultation, guide "*decisions made by the relevant Secretary of State on applications for development consent for data centres under the Nationally Significant Infrastructure Project (NSIP) consenting regime*". The project under consideration in Enfield, should it not be granted planning permission, will be subjected to the SoS's decision and guided by the final NPS.

3. We do not wish to pre-empt a public consultation, but the draft policy reflects the five tests of The Data Centre Covenant published following the 2026 budget. These are

1) Lower electricity bills
2) Invest in improving local communities
3) Adhere to the highest environmental standards
4) Create jobs, apprenticeships, and drive reindustrialisation
5) Strengthen Britain's security

4. The draft NPS contains substantial guidance on Land use and Green Belt, covering assessment and decision making. "Assessment Principles" includes chapters on Environmental Impact Assessment (EIA), Habitats Regulation Assessment (HRA), Environmental Net Gain (ENG) and Biodiversity Net Gain (BNG), and much else besides.

5. Para 349 of the NPS states "*The presumption of consent set out in section four of this NPS does not apply to development in the Green Belt. Applicants should therefore determine whether their proposal, or any part of it, is within an*

established Green Belt and, if it is, whether their proposal may be inappropriate development within the meaning of Green Belt in chapter 13 of the NPPF."

6. The section on "Generic Impacts" covers: air quality and emissions, biodiversity, historic environment, flood risk, coastal change, dust, odoiur, artificial light, smoke, and steam, landscape and visual impacts, land use and Green Belt, noise pollution, socio-economic impacts, traffic infrastructure, water quality and resources, resource and waste management.

7. In short, the terms of the draft National Policy cover the bulk of our concerns with the proposed development and the EIA Scoping Report which we consider at length in the next section. We feel, as well, that there are omissions concerning urban heat, drought, for instance, which we will deal with in our response to the national consultation.

In the light of these considerations we urge both councils, and ODC, to pause the J24 Data Centre development until the national consultation is complete and the NPS finalised.

AfEF's other concerns about the proposed Junction 24 Data Centre development on designated Green Belt Land

The proposal is for a major industrial development on approximately 30 acres (12.17 hectares) of Green Belt countryside south-east of Junction 24 of the M25. It comprises two substantial data centre buildings, associated electricity infrastructure, back-up generators, cooling equipment, access roads, parking, and extensive ancillary development.

This is an exceptionally large and energy-intensive development which would permanently transform the character of the countryside and have potentially significant consequences for the surrounding environment, natural resources, and local communities.

We do not believe that the developer has demonstrated that this is an appropriate location for such a development, or that the proposed Environmental Impact Assessment will adequately identify and evaluate its full environmental consequences.

The Greater London Authority has commissioned Buro Happold to produce an evidence-based report for the Greater London Authority "London's Data Centre Future Growth Forecasts and Strategic Insights" (Dec 2025) which in its summary reports that "*Energy is the single most critical constraint on London's data centre growth*" amongst a number of "*Infrastructure challenges*." The summary continues to report that "*London's data centre sector faces complex challenges related to underlying land supply, utility provision, and sustainable growth*". If "Strategic infrastructure planning" is a major

challenge, it seems that to pause now is the only sensible action for Hertsmere and Enfield Councils as well as ODC.

Our principal objection is that the proposed EIA is unduly narrow and appears designed to minimise the number of environmental issues which will be subject to full assessment within the Environmental Statement. The developer proposes to concentrate principally on climate change and landscape and visual effects, whilst *"All other environmental topics are proposed to be scoped out as standalone assessments,"* hence excluded from the EIA.

This concerns us because the supporting technical reports themselves contain important uncertainties, incomplete evidence and assumptions which require much more rigorous examination.

An EIA should provide an objective and comprehensive assessment of the significant environmental effects of a development. It should not be used simply to demonstrate that individual impacts can be addressed through separate technical reports or future mitigation measures.

Ecological systems, by their nature, are interconnected, dynamic and multifaceted. One environmental change can have many consequences; one consequence could have many causes. Environmental impacts are complex and incremental. An environmental impact assessment should reflect this reality.

AfEF considers that the proposed EIA Scoping Report's suggestion that the Environmental Statement should simply focus on climate change and landscape and visual effects, is flawed.

Air quality, noise, ecology, transport, water resources, heat, drought, flood risk, heritage, population and human health, and socio-economic effects are all proposed to be excluded from the EIA. The developer intends to deal with these through separate technical reports instead. This is a substantial narrowing of the environmental assessment for a development of this scale. (Scoping Report, paragraphs 10.2–10.7, pages 99–100.)

There are also weaknesses within the supporting evidence itself:

- The ecological assessment acknowledges that surveys are incomplete, that access to some areas has been restricted and that further survey work remains outstanding.
- The air-quality assessment proposes to scope out air quality despite part of the site being within Enfield's borough-wide Air Quality Management Area. PM10 is referred to but not the more harmful PM2.5.

- The transport assessment relies on percentage increases in traffic flows to justify excluding transport from the EIA, notwithstanding the predicted 1,660 daily construction vehicle movements.
- The water and flood assessment appears to concentrate on conventional flood risk, without giving sufficient prominence to water scarcity, drought and the interaction between summer temperatures and cooling requirements.
- The alternatives assessment proposes to consider only alternatives already explored during the developer's design process, expressly excluding theoretical alternatives. This risks failing to examine whether a Green Belt location is justified in the first place.

AfEF urges both councils to reject the proposed scope of the EIA and require a more comprehensive and integrated assessment in line with the requirements of the NPS when it is finalised .

Detailed considerations

1. The proposed scope of the Environmental Statement (ES) is too narrow

1.1 The most concerning aspect of the Proposed EIA is the proposal set out in paragraphs 10.2–10.7.

"*Climate change **will be scoped into** the Environmental Statement as a standalone topic" (10.2) and "Landscape and visual effects will be **scoped into** the ES because of the potential scale, massing, plant, security infrastructure and lighting associated with the Proposed Development" (10.3)*

*However " All other environmental topics are proposed to be **scoped out** as standalone assessments. This includes*

- *air quality*
- *noise and vibration*
- *ecology and biodiversity*
- *transport and access*
- *water resources*
- *flood risk and drainage*
- *land contamination and ground conditions*
- *major accidents and disasters*
- *population and human health*
- *materials*
- *waste*

- *circular economy and soils*
- *heritage and archaeology*
- *socioeconomics*

"The supporting assessments indicate that, subject to the identified embedded design and mitigation measures, ***these matters are not likely to result in significant environmental effects*****" (10.4).**

This seems to us premature.

1.2 Then we read:

"*Subject to confirmation through the Scoping Opinions,* *the proposed ES will therefore comprise a focused assessment of climate change and,* ***unless robustly scoped out through further evidence****, landscape and visual effects. This represents a proportionate EIA scope while ensuring that all other environmental matters remain appropriately evidenced, mitigated and integrated into the planning application" (10.7).*

The developer proposes instead to rely on separate technical assessments to address these matters.

We recognise that supporting technical reports have a key role in an EIA. However, their existence does not justify excluding potentially significant environmental effects from the ES .

The distinction matters. An ES should bring together the evidence, identify the significance of the effects, and explain how they interact and accumulate. It should provide a coherent account of the overall environmental consequences of the development.

1.3 This is especially important for a data centre because its environmental effects are closely interconnected.

For example:

- Electricity consumption, carbon emissions, generator emissions, and climate change are related.
- Cooling requirements, waste heat, summer temperatures, and water consumption are interdependent.
- Noise, air pollution, and lighting from operational plant can affect both residents and wildlife.
- Construction traffic, earthworks, dust, noise, and drainage changes need to be considered together.

- Habitat loss, changes to ground levels, landscaping and surface water management have combined ecological and environmental consequences.

The developer's proposed approach risks fragmenting these issues and understating their combined significance.

1.4 The assertion in paragraph 10.7 that a focused assessment of climate change and landscape and visual effects is proportionate is not adequately justified by the scale and characteristics of this particular development.

AfEF requests that all potentially significant environmental effects are included in the Environmental Statement, with the supporting technical reports incorporated as appendices and their findings rigorously evaluated in the main assessment.

2. Green Belt: the fundamental objection to the location

2.1 The first question should be whether this development should take place on this site at all.

The developer's emphasis on the site's proximity to the M25 does not establish that it is an appropriate location for a major industrial development, there is significant evidence to reach a contrary conclusion.

The site is not previously developed industrial land. It is Green Belt countryside and farmland with an established rural character, existing vegetation, pasture, hedgerows, woodland features, and an on-site pond.

2.2 The site, New Cottage Farm, has been farmed for many years for "productive arable and grass" (see below).



The proposed EIA Scoping Report downplays the agricultural value of the site without adequately justifying its conclusion. Although the Agricultural Land Classification (ALC)

identifies the land as Grade 3 (good to moderate quality), the report relies on "soil profiling" to sub-classify the land as Grade 3b (moderate quality agricultural land), before dismissing it as being "of low agricultural utility and not important on a local, regional or national basis".

This conclusion is both questionable and inadequately evidenced. The fact that land is classified as Grade 3b does not establish that it has little agricultural value or importance. The report should provide unambiguous evidence to support this judgement, rather than using a subjective assessment of agricultural utility to minimise the significance of the loss of productive agricultural land.

2.3 The "Surplus Property Disposal Report KD5974 describes this site as "*undeveloped agricultural land*". Abandoned cropland is increasingly seen as having potential to support both food security and climate change mitigation, but this was not considered either in KD5974 or in the proposed EIA Scoping Report as an alternative valuable, sustainable, economic use.

2.4 KD5974 also records that "*Part of the site is affected by covenants in favour of the Duchy of Lancaster to not use the land / property for any purpose other than as open space or recreation and pleasure grounds, sports grounds, public walks or playing fields or for physical training purposes and not to do or permit to be done anything to alter, destroy or injure the character of the property or any part of the property as it is now or the amenities thereof. The written consent of the Duchy of Lancaster will need to be obtained by the Council for the disposal and in respect of the ultimate use.*"

2.5 This gives us pause for thought as does the fact that New Cottage Farm is also identified as the site of volunteer Tree Planting, part of Enfield Council's Nature Recovery and the wider, publically funded, Enfield Chase Landscape Restoration.

2.6 A Forestry Commission grant of £50k is being used to create the 20 ha Enfield Chase Northern Gateway Woodland at New Cottage Farm and Holly Hill. In January 2026 Enfield Council approved disposal of 27.6 acres of surplus property (KD5974), described as "Land at New Cottage Farm, J24, M25, The Ridgeway, Enfield" to a confidential buyer. ODC describes the site of the proposed Data Centre as "around 29 acres (11.65 hectares) of land next to Junction 24 of the M25, between The Ridgeway (A1005) and the motorway".

2.7 Available maps show that these parcels of land are co-located but AfEF has not been able to determine the exact boundaries. It's likely that the woodland planting is separate from the proposed data centre. Nevertheless it is likely to be sufficiently close to expose the expected nature recovery to risk when the environmental conditions described in the proposed EIA are considered e.g. damage to woodland edges and habitat connectivity, soil compaction, noise, vibration, drainage and water availability

from construction works and excavation all of which threaten natural generation in a location already challenged by drought.

2.8 Whilst "*There are no public footpaths traversing the site"* (3.11), Public Right of Way 210 is on the boundary of the ODC site adjacent to St John's preparatory school. Furthermore, unless we have misunderstood, the 313 bus route along the Ridgeway serves three buses an hour not just one as the Proposed EIA Scoping Report suggests (3.6). And in recent years, residents would not have described the site location as experiencing "*a temperate climate, with mild summers, cool winters, and regular rainfall throughout the year"*. What they've experienced has been quite the opposite.

2.9 There is particularly important planning evidence, too, which is distinctively pertinent. In June 2026, the independent inspector examining Enfield's emerging Local Plan concluded that the proposed industrial allocation of this site was not justified. He identified a very high degree of harm to Green Belt purposes and concluded that exceptional circumstances for its release had not been demonstrated. We note that LPP, the authors of the EIA scoping report, "*will be submitting robust representations to the Main Modifications consultation stage, explaining why the new Enfield Local Plan would not be unsound if the draft allocation was retained, in a revised form*." Having spent many hours, days and weeks attending the rigorously evidence-based examinations in public, we find this a diverting intervention.

2.10 The proposed EIA Scoping Report describes the site as relatively enclosed and suggests that surrounding vegetation and topography will limit the visibility of the development. However, the absence of extensive visibility does not remove the harm caused by the permanent loss of Green Belt openness and the introduction of substantial industrial buildings.

2.11 The proposals involve extensive changes to the existing landform. The western field would be lowered by approximately 3.3 metres in places and the eastern field raised by up to approximately 6.8 metres.

And although KD5974 (para 37) acknowledges that "*Any development of the land that the buyer or future parties* ***implement will result in significant embodied and operational carbon emissions*****"** it does not address the carbon emissions that arise when undisturbed land is excavated.

2.12 Excavated soils are an overlooked carbon source emitting both carbon dioxide (CO_2), nitrous oxide (N_2O) and methane (CH4) the latter being very potent greenhouse gases. Greenhouse gas emissions and removals in the land use, land use change and forestry sector (LULUCF) are mapped for the National Greenhouse gas Inventory.

2.13 The developer's proposed planting of 640 trees and creation of landscaped areas cannot compensate for the loss of open countryside. New planting does not immediately

replace established landscape features or the openness of the existing site. Neither does it sequester significant amounts of carbon in the early stages.

A comprehensive, and impartial carbon emissions inventory should be part of the Climate Change Chapter in the EIA.

The Green Belt harm must be assessed as a fundamental planning consideration and not treated as a matter which can be overcome through landscape mitigation.

3. Climate change, energy consumption, and carbon emissions

3.1 We welcome the inclusion of climate change as a full EIA topic. However, the proposed methodology raises significant concerns about whether the assessment will be sufficiently rigorous and quantitative.

The proposed development has an electricity connection requirement of up to 150MW and an IT load of approximately 108MW. This is an enormous demand for electricity, particularly when considered alongside the growing demand for electricity from other data centres, housing, industry, and transport and uncertainty over when electricity generation is fully renewable.

3.2 The Proposed EIA proposes a combination of quantitative and qualitative assessment. Paragraph 8.46 indicates that qualitative assessment may be used where information is unavailable, with further assessment and follow-on measures potentially required at a later stage.

This is not sufficient for a development of this scale.

3.3 The Environmental Statement should provide a robust and quantified assessment of the energy consumption and greenhouse gas emissions over the full lifetime of the development.

It should include:

- Annual electricity consumption and maximum operational demand.
- The projected carbon intensity of the electricity supply over the operational lifetime.
- Embodied carbon from construction, materials, equipment, and infrastructure.
- Operational carbon emissions.
- Emissions from back-up generators, including routine testing and emergency operation.
- The carbon implications of replacing and upgrading equipment.

- Decommissioning and end-of-life impacts.
- The contribution of the development to national and regional energy demand.
- Emissions from excavation and changes to landform.
- The benefits of food security and climate mitigation arising from alternative use as farmland

3.4 The assessment should not rely on assumptions that electricity will increasingly be supplied from renewable sources without explaining how this will be achieved and over what timescale.

The developer must also explain how the proposed development will be compatible with national carbon budgets and the transition to net zero.

4. Waste heat and the urban heat island effect

4.1 The proposed data centre will generate substantial quantities of waste heat through its operation and cooling systems.

The proposed EIA scoping report acknowledges that heat will be discharged into the atmosphere, although it suggests that heat recovery and export to a district heating network could reduce this.

However, the proposed heat recovery appears dependent on identifying a viable heat user. This should not be treated as an established environmental benefit.

4.2 The assessment must quantify the expected heat rejection, including under worst-case summer operating conditions, and establish the extent to which heat recovery is technically and practically achievable.

It should also assess the cumulative effects of heat release and the implications for local temperatures.

4.3 This is particularly important as climate change is increasing the frequency and severity of heatwaves. The effects of large-scale industrial development on local microclimates should not be dismissed simply because the site is currently outside a densely built urban area.

5. Air quality and the 72 back-up generators

5.1 AfEF strongly objects to the proposal to scope air quality out of the Environmental Statement.

The proposed EIA Scoping Report acknowledges that the eastern part of the site lies within Enfield's Air Quality Management Area, which covers the whole borough in relation to nitrogen oxides and particulate matter including Pm10 and Pm2.5

Despite this, the developer concludes that significant air-quality effects are unlikely.

5.2 The proposal includes 72 back-up generators. These are a substantial element of the development's infrastructure and cannot simply be regarded as insignificant because they are intended primarily for emergency use.

5.3 The Environmental Statement should assess:

- The generating capacity and fuel requirements of all 72 generators.
- Their emissions of nitrogen oxides, particulate matter, and other relevant pollutants.
- Routine testing and maintenance emissions.
- The potential consequences of prolonged operation during a major electricity supply failure.
- The cumulative emissions if generators operate simultaneously.
- The effects on nearby homes, schools, businesses, and sensitive ecological receptors[1].
- The combined effects of generator emissions and existing pollution from the M25 and local roads.

5.4 The developer should not be permitted to rely on assumptions about limited operating hours without demonstrating that the proposed assessment covers realistic emergency scenarios.

5.5 The presence of an Air Quality Management Area makes a particularly careful assessment necessary. The fact that background concentrations may currently be below certain air-quality objectives at individual receptors does not, by itself, demonstrate that additional pollution is acceptable.

The assessment should also consider construction dust and emissions from construction traffic.

5.6 Air quality should therefore be included as a full EIA topic.

[1] In an Environmental Impact Assessment (EIA), a **receptor** is a person, animal, plant, habitat, building, watercourse or other environmental feature that could be affected by a proposed development.
Put simply, it is **something that might experience an impact from the development**.
The term is important because an EIA should identify not only what the developer proposes to do, but also what or whom that activity might affect. AfEF has adopted the term us used in the proposed EIA.

6. Noise and vibration

6.1 The proposed data centre will operate continuously, requiring substantial cooling, ventilation, and electrical plant.

The noise assessment is based on measurements taken between 9 and 13 July 2026 at two locations. AfEF questions whether this provides a sufficiently representative baseline for assessing the effects of a major industrial facility operating 24 hours a day throughout the year.

6.2 The nearest residential properties and St John's Preparatory Nursery School are identified in the report.

The assessment must consider:

- Continuous operational noise, including night-time conditions.
- Cooling equipment and ventilation systems.
- Transformers and electrical infrastructure.
- The noise from all 72 back-up generators.
- Routine generator testing and emergency operation.
- Low-frequency and tonal noise.
- Construction noise and vibration.
- Cumulative effects with existing motorway noise.

6.3 The assessment must not assume that the existing M25 traffic noise makes additional industrial noise insignificant.

6.4 The character of noise matters as well as its measured level. Continuous mechanical noise, tonal noise, and low-frequency noise can be particularly intrusive.

6.5 The effects on residential amenity and the nursery school should be assessed.

6.6 Noise and vibration should be included in the Environmental Statement, rather than left solely to a separate technical report.

7. Ecology and biodiversity: incomplete surveys and premature conclusions

7.1 The ecological evidence is one of the most concerning aspects of the IEA Scoping Report. The developer concludes that the site is of low ecological value and that no significant ecological effects are anticipated, subject to mitigation.

However, the Ecological Technical Note included in Appendix 5 acknowledges a number of important limitations.

These include:

- Access has not yet been obtained to the house and garden.
- Some trees could not be adequately inspected because of access and safety constraints.
- Potential bat roost features may therefore have been missed.
- Bat activity data was still being analysed.
- Only four of the six breeding bird survey visits had been completed when the preliminary assessment was prepared.
- Further bat surveys were still due to be undertaken.

The report itself acknowledges that some survey findings remain provisional.

7.2 It is therefore premature to conclude that there will be no significant ecological effects.

7.3 The site contains native hedgerow Priority Habitat, including two lengths of high distinctiveness for biodiversity net gain purposes. Deciduous woodland is recorded approximately 8 metres from the site, and two Local Wildlife Sites are identified within approximately 500 metres. It also contains an existing pond, trees, and other habitat features.

7.4 The assessment must consider the wider ecological network and not simply the land within the development boundary. AfEF is particularly concerned that the ecological assessment appears to place considerable reliance on the assumption that boundary vegetation will be retained and that replacement habitats can be created.

7.5 The loss of established habitats cannot automatically be compensated for by new planting. Newly created habitats take time to establish and may not provide equivalent ecological functions.

7.6 The developer should be required to complete all necessary seasonal surveys before reaching conclusions about ecological effects.

7.7 The Environmental Statement should include a full assessment of habitat loss, fragmentation, disturbance, lighting, noise, protected species, wildlife corridors, and the effects on nearby designated sites.

7.8 Biodiversity net gain should not be used as a substitute for avoiding harm in the first place.

8. Water resources, cooling, and drought

8.1 AfEF is concerned that the proposed assessment does not give sufficient attention to water scarcity and drought.

The developer proposes a closed-loop cooling system and suggests that this will reduce the need for continuous mains water consumption.

However, the initial filling of the cooling system is expected to require substantial quantities of water, with the report identifying up to 45 tanker deliveries over a nine-week period.

8.2 The Environmental Statement must establish the total water requirements of the development, including:

- Initial filling of cooling systems.
- Annual operational water consumption.
- Water losses through evaporation, maintenance, and other processes.
- Peak demand during prolonged hot weather.
- The source of water and the implications for existing supplies.
- The resilience of water availability during drought.
- The cumulative effect of other proposed developments on water resources.

The assessment must not assume that a closed-loop cooling system has no significant water implications.

8.3 There is an important relationship between rising summer temperatures, cooling requirements, and water availability. The hotter the weather becomes, the greater the potential pressure on cooling systems and water resources.

8.4 This relationship should be explicitly assessed under realistic future climate scenarios.

9. Drainage and flood risk

9.1 The report proposes to scope flood risk and drainage out of the Environmental Statement on the basis that the site is at relatively low risk of flooding.

9.2 However, flood risk is only one aspect of water management.

9.3 The substantial earthworks and changes to land levels could affect natural drainage, groundwater infiltration, and surface water movement.

9.4 The assessment must consider the consequences of replacing open land with large buildings, hard surfaces, and associated infrastructure.

9.5 It should also examine the cumulative implications for local watercourses and drainage systems. The retention of natural drainage and water infiltration functions is important in both preventing flooding and maintaining environmental resilience during periods of drought.

9.6 Water resources, drainage, and flood risk should be properly integrated into the EIA.

10. Landscape, visual effects, and the loss of countryside

10.1 AfEF welcomes the proposal to include a full Landscape and Visual Impact Assessment, but we are concerned that the preliminary assessment understates the impact of the development.

10.2 The Proposed EIA suggests that the effects will be greatest within the site and its immediate surroundings and that existing vegetation and topography will limit visibility further afield.

This conclusion should not be accepted without a comprehensive assessment.

10.3 The development will introduce two very large industrial buildings, substantial plant, flues, generators, a substation, and associated infrastructure into an area which currently retains a rural character.

10.4 The assessment must consider the actual maximum building heights, including plant and flues, as well as the substantial changes to ground levels.

10.5 It must include views from The Ridgeway, nearby homes, public rights of way and the wider countryside.

10.6 Attention should be paid to:

- The effect on the openness of the Green Belt.
- The loss of the existing rural landscape character.
- The visual impact of the buildings and infrastructure.
- Night-time lighting.
- The appearance of the development during winter.
- The time required for proposed planting to mature.
- The effectiveness and long-term maintenance of screening.

10.7 The fact that the M25 is nearby does not mean that further industrial development will have no material effect on the landscape.

10.8 Nor does screening remove the underlying loss of open countryside.

10.9 The landscape assessment must be independent, comprehensive, and based on realistic visualisations of the completed development.

11. Transport and construction impacts

11.1 The proposed transport assessment also raises significant concerns.

11.2 The developer proposes to exclude transport and access from the Environmental Statement, relying on the assertion that construction and operational traffic will not have a significant effect on the highway network.

11.3 However, the Proposed EIA Scoping Report identifies the following construction impacts:

- Up to 800 construction workers on site at one time.
- Approximately 1,600 daily vehicle movements associated with construction workers.
- Around 60 HGV movements per day during peak construction activity.
- Up to 100 HGV movements per day during peak concrete deliveries.
- Up to 45 tanker deliveries during the initial filling of the cooling system.

11.4 The report estimates that construction could generate 1,660 daily vehicle movements at peak periods. These are substantial levels of activity for a development in this location. The assessment relies heavily on percentage increases in existing traffic flows, including thresholds of 30% for general traffic and 10% for sensitive locations.

AfEF questions whether these thresholds provide a sufficient basis for dismissing the environmental effects of the development and the impact of additional traffic cannot be judged solely by percentage increases. The nature and capacity of the roads, road safety, pedestrian movements, school access, congestion, and the sensitivity of surrounding communities must also be considered.

11.5 The assessment must include the cumulative effects of other developments and any planned works to Junction 24 and the M25.

It should also examine the implications of deliveries, abnormal loads, construction workforce travel, and the operational movements associated with maintenance and shift changes.

11.6 The claim that operational traffic will be insignificant also requires scrutiny. The developer estimates 175 daily vehicle trips, including 170 cars and five HGVs. The assumption that shift patterns will avoid peak congestion does not establish that the additional traffic will have no environmental or safety implications.

11.7 Transport should be included in the Environmental Statement.

12. Population, human health and wellbeing: an unjustified exclusion

12.1 AfEF is particularly concerned by the decision to scope population and human health out of the Environmental Statement.

12.2 Paragraph 9.40 acknowledges that the assessment will integrate the potential effects of air quality, noise and vibration, lighting, traffic, visual change, heat, electromagnetic fields, water stress, construction workforce, fire and safety on nearby residents, school users, and other vulnerable receptors.

These are precisely the issues which could affect the health and wellbeing of local communities.

Nevertheless, the report concludes that no significant population or human-health effects are anticipated and proposes to exclude this topic as a standalone assessment.

12.3 This conclusion appears premature, particularly when the supporting assessments are not yet complete.

The combined effects of noise, air pollution, lighting, heat, traffic, and other environmental changes must be considered in relation to the people who will experience them.

The presence of nearby homes and a school makes this particularly important. And positing the benefits of a district heat network, if the proposition is accepted, carries with it a significant population increase.

12.4 The assessment should identify vulnerable receptors and consider the combined effects on residential amenity, health, and wellbeing. It is not sufficient to examine each issue separately and then assume that no significant human-health and well-being consequences will arise.

After all, the London Plan proposes 7000 homes on Enfield's Green Belt but the Mayor of London will not disclose the sites.

We await the Main Modifications to Crews Hill and Chase Park developments in Enfield's Local Plan. And the decision about the proposed 21,000 homes comprising Crews Hill New Town is delayed yet again.

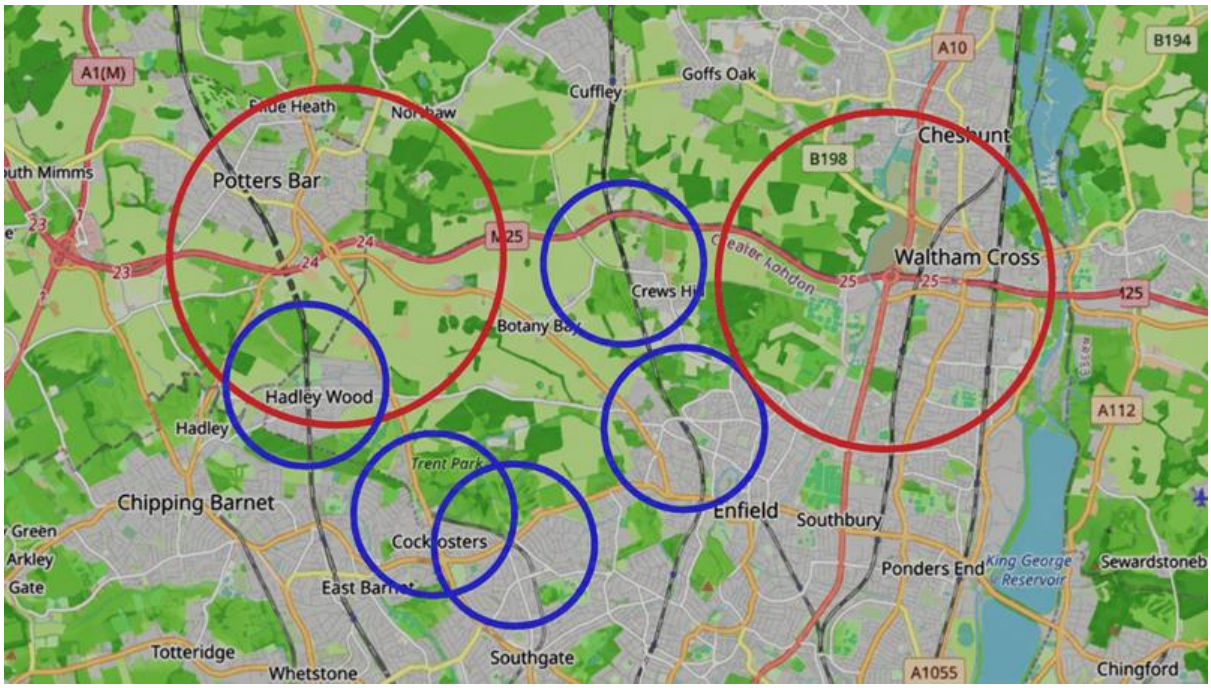
12.5 Furthermore Data centres tend to be constructed in clusters because approving one site sets a precedent and upgrades local infrastructure for others. The J24 data centre would be part of an emerging M25 North cluster and could lead to more data centres in Enfield's Green Belt, aggravating the concerns for human health and well being already described.

12.6 So any harmful effects could affect many tens of thousands of residents. AfEF campaigns for transparent, evidence-based decisions for residents. Enfield residents

are badly served by decision makers meant to be acting in their interest. For it is no longer inconceivable that swathes of the Green Belt land between the M25 and the A110 could be developed to extend London's urban sprawl through Potters Bar to South Hertfordshire (Fig 1)

Fig 1 Better Homes Enfield

Sadiq Khan's Draft London Plan sets Enfield a target of building 7,000 homes on greenfield land within walking distance of five stations: Gordon Hill, Hadley Wood and Crews Hill railway stations, and Cockfosters and Oakwood Underground stations.



12.6 The situation is opaque and hence uncertain. To proceed with the proposed Data Centre on this basis, reckless.

13. Socio-economic benefits: the need for a balanced assessment

13.1 The developer places considerable emphasis on the economic benefits of the proposed development. The Proposed EIA Scoping Report estimates 1,400–1,700 full-time equivalent jobs per annum during the three-year construction period, including indirect and supply-chain employment. Once operational, the development is estimated to provide approximately 170 direct jobs, with a further 85 indirect and induced jobs.

13.2 These figures should be examined carefully.

13.3 The construction employment figures include jobs supported through wider supply-chain expenditure and do not represent the number of people who will be

employed on the site at any one time. The operational employment estimate is based on an assumed employment density of 360 square metres per full-time equivalent job. The additional 85 jobs are estimated using a multiplier of 1.5.

13.4 The economic assessment should therefore explain clearly the assumptions underlying these estimates, the extent to which the jobs will benefit local residents and the degree to which they represent genuinely additional employment.

13.5 The limited number of permanent operational jobs should be considered alongside the permanent loss of Green Belt countryside and the substantial environmental and infrastructure costs.

If the developer wishes to rely on economic benefits to justify this development, those benefits should be assessed transparently and weighed against its environmental consequences.

14. Alternatives: the failure to examine whether this is an appropriate site

14.1 The approach to alternatives set out in paragraphs 7.18–7.20 is inadequate.

14.2 The developer proposes to examine the no-development scenario and alternatives relating to location and design which have already been considered during the design process. However, paragraph 7.20 expressly states that it is not necessary to consider theoretical alternatives which have not been considered through the design process. This is concerning because the fundamental question is whether a major data centre should be developed on this area of Green Belt countryside.

14.3 The assessment should not be restricted to options already favoured by the developer.

14.4 The Environmental Statement should explain the site-selection process and provide a meaningful comparison of reasonable alternatives, including:

- Previously developed land.
- Existing industrial and employment sites.
- Locations outside the Green Belt.
- Sites with less landscape and ecological sensitivity.
- A smaller development with lower energy and infrastructure requirements.
- Alternative designs which retain more of the existing countryside.
- The option of not proceeding and using the land sustainably to address impending food and climate insecurities.

14.5 The assessment should explain why the proposed site has been selected and why less environmentally damaging alternatives are not considered suitable.

14.6 The fact that data centres are increasingly important to the digital economy does not establish that this site is necessary or appropriate.

15. Cumulative and interacting environmental effects

15.1 The assessment of cumulative and combined effects is particularly important for this development.

15.2 The Proposed EIA Scoping Report acknowledges that cumulative effects will be considered, including other data centres, combustion plant, M25 and Junction 24 works and connected electricity, water, and wastewater infrastructure.

This is welcome, but the approach must be sufficiently comprehensive.

15.3 1The assessment should not be limited by arbitrary geographical boundaries or by the assumption that developments must already have planning permission before they are considered.

It should identify foreseeable developments and infrastructure projects and examine the combined effects on:

- Electricity demand and grid capacity.
- Greenhouse gas emissions.
- Water resources and wastewater infrastructure.
- Air quality and pollution.
- Traffic and road capacity.
- Landscape and visual character.
- Biodiversity and ecological connectivity.
- Local communities and public health.
- Rising temperatures and excess heat

15.4 The interaction between the environmental effects of this development must also be examined.

For example, the impact of generator emissions should be considered alongside motorway pollution. The effects of cooling equipment should be considered alongside waste heat and rising summer temperatures. Changes to land levels and drainage should be considered alongside the loss of natural habitats and water infiltration.

These are not unrelated technical matters. They are interconnected consequences of the same development.

15.5 The assessment must provide a clear account of the combined environmental impact.

16. The need to assess the entire development and its associated infrastructure

16.1 The site straddles the administrative boundaries of Enfield and Hertsmere.

It is essential that the two councils assess the proposal as one integrated development.

16.2 The Environmental Statement must include all necessary infrastructure and associated works, including electricity connections, grid upgrades, cables, water and wastewater infrastructure, highway improvements, and other enabling works.

The Proposed EIA Scoping Report suggests that some of these may be assessed as connected, indirect or cumulative development.

This must be clarified. The developer should not be allowed to exclude essential infrastructure from the assessment simply because it is delivered through separate applications or by other organisations.

16.3 The full environmental consequences of making this development operational must be assessed.

17. The outline nature of the proposals and the need for certainty

17.1 The proposals remain at an outline stage, with important design and engineering details yet to be finalised.

The Environmental Statement must therefore assess the maximum parameters of the development that could be permitted.

It should include realistic worst-case assumptions for:

- Building heights and massing.
- Plant and equipment.
- Flues and generators.
- Electricity infrastructure.
- Cooling systems.
- Earthworks and changes to ground levels.
- Lighting.

- Access and servicing arrangements.
- Water consumption and drainage.

17.1 The developer should not be allowed to defer the assessment of potentially significant effects to later detailed design stages.

Where information is not yet available, the assessment should adopt a precautionary worst-case approach and demonstrate that the effects can be satisfactorily mitigated.

18. Requirements for the councils' Scoping Opinions

For the reasons set out above, AfEF requests that Enfield Council and Hertsmere Borough Council do not accept the proposed scope of the Environmental Impact Assessment as submitted.

AfEF asks the Councils to ensure that the following requirements are stipulated

1. A comprehensive Environmental Statement which includes all potentially significant environmental effects, rather than concentrating on only climate change and landscape and visual effects.
2. A full assessment of air quality, including the emissions from all 72 generators, construction traffic, and cumulative pollution.
3. A full assessment of operational and construction noise, including night-time conditions, low-frequency noise, and generator testing.
4. Completion of all necessary ecological surveys before conclusions are reached about the significance of ecological effects.
5. A comprehensive assessment of water consumption, drought resilience, cooling requirements, and the implications of future climate change.
6. A full assessment of construction and operational traffic, including the effects on Junction 24, The Ridgeway, road safety, and nearby sensitive receptors.
7. A proper assessment of population and human health, considering the combined effects on nearby residents, schools, and other vulnerable groups.
8. A quantified whole-life carbon assessment and a transparent assessment of electricity demand, waste heat, and the contribution to climate change.
9. A comprehensive assessment of landscape and visual effects, including the loss of Green Belt openness and the substantial changes to the existing landform.
10. A robust assessment of reasonable alternatives, including less environmentally damaging locations and the option of not proceeding.

11. A comprehensive assessment of cumulative and interacting effects, including associated infrastructure and development in both Enfield and Hertsmere.
12. An assessment based on the maximum development parameters, with no deferral of significant environmental matters to later applications or reserved matters.
13. Clear and accessible reporting of all technical evidence, assumptions, mitigation measures, and residual effects.

Conclusion

AfEF strongly objects to the proposed Junction 24 Data Centre.

The development would result in the permanent transformation of Green Belt countryside into a major industrial complex, with two substantial buildings, significant electricity infrastructure, 72 back-up generators and extensive associated plant and equipment.

The scale of the development, its exceptionally high energy requirements and its demands on water, transport and other infrastructure raise serious environmental concerns.

The proposed planting and landscaping do not overcome the fundamental objection to the loss of Green Belt countryside.

The findings of the independent Local Plan inspector in June 2026 are particularly relevant. The proposed industrial allocation of this site was found to cause a very high degree of harm to Green Belt purposes, and the exceptional circumstances necessary to justify its release had not been demonstrated.

We are also deeply concerned that the developer's proposed Environmental Impact Assessment is too narrow and relies on preliminary technical reports which contain incomplete evidence and assumptions that require further scrutiny.

A development of this scale should be subject to the highest standards of environmental assessment. The purpose of an EIA is to establish objectively whether a development is environmentally acceptable, not simply to demonstrate that its individual effects can be managed through mitigation.

The councils should not accept an assessment which excludes so many important environmental matters from the Environmental Statement. All potentially significant effects, including their combined and cumulative consequences, must be properly evaluated before any planning decision is made.

More fundamentally, even a comprehensive assessment would not automatically justify the loss of this Green Belt land.

AfEF therefore asks the councils to require a more comprehensive Environmental Impact Assessment and to give serious consideration to refusing a development which would cause such significant and irreversible harm to the Green Belt and the wider environment.

The protection of our countryside, biodiversity, natural resources, and the wellbeing of local communities must take precedence over the commercial interests of the developer.

Yours faithfully,

Victoria Pite on behalf of Action for Enfield's Future

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CC

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