Subject: Objection to the proposed Junction 24 Data Centre, The Ridgeway, Enfield – concerns about the development and its Environmental Impact Assessment

Dear [MP's name],

I am writing to ask you to oppose the proposed Junction 24 Data Centre development by Orbital Data Centres Ltd on land to the south-east of Junction 24 of the M25, beside The Ridgeway, Enfield. I am particularly concerned that the scale and nature of this development are inappropriate for this Green Belt location, and that the applicant's Environmental Impact Assessment (EIA) Scoping Report does not provide a sufficiently comprehensive or convincing basis for assessing its environmental consequences.

The proposal is for a major AI and cloud data centre development, comprising up to 50,000 square metres of floorspace, two large buildings, extensive cooling and electrical plant, a substation and 72 back-up generators. The report identifies a grid connection of up to 150 MW and an IT load of 108 MW. The buildings could reach approximately 29 metres above existing ground level in places, with substantial changes to the existing landform, including excavation of up to 3.3 metres in the western part of the site and raising levels by up to 6.8 metres in the eastern part.

This is not a modest or low-impact development. It would transform approximately 30 acres of open countryside into a large, industrial-scale complex, with significant implications for the Green Belt, landscape, biodiversity, local residents, energy and water resources.

1. The Green Belt and the loss of open countryside

The site lies within the Metropolitan Green Belt. It is currently open pastureland, with trees, hedgerows and a pond, and forms part of the wider rural landscape around The Ridgeway. The western field is also subject to a Community Forest designation.

The applicant's report acknowledges the Green Belt designation but does not establish that this is an appropriate location for development of this scale, or that the loss of openness and countryside is justified. The fact that the site is close to the M25 does not make it suitable for an industrial-scale development. Nor does proximity to existing infrastructure remove the fundamental planning considerations associated with building on Green Belt land.

The proposed buildings, plant, generators, security infrastructure, lighting and extensive earthworks would fundamentally change the character of the site. Planting and landscaping cannot compensate for the loss of open countryside or restore the openness of the Green Belt.

I am also concerned that the report refers to the site's potential for employment allocation in emerging local plans without resolving the planning objections to that approach. The applicant should not be able to treat an emerging or candidate employment allocation as evidence that this development is acceptable in principle.

I ask you to press the councils to give proper weight to Green Belt policy and to require the applicant to demonstrate why this development must be located here rather than on suitable brownfield or existing employment land.

2. The Environmental Impact Assessment is too narrow

The EIA Scoping Report is intended to determine which environmental effects will be examined in the Environmental Statement accompanying the planning application. It is therefore a crucial stage in ensuring that the full consequences of the proposal are properly understood before a decision is made.

I am concerned that the report proposes to scope out several important topics as separate EIA chapters, including ecology and nature conservation, population and human health, and flood risk and drainage. Other matters, including air quality, noise and transport, are proposed to be addressed through separate technical assessments rather than full EIA chapters.

There is nothing inherently wrong with using separate technical reports. However, this must not result in important environmental effects being fragmented, underestimated or overlooked. The Environmental Statement must bring the evidence together and assess the combined and cumulative consequences of the development. In my view, the current scoping report does not yet demonstrate that this will happen adequately.

It is particularly concerning that the report concludes that there are unlikely to be significant effects in several areas before the full supporting evidence and assessments have been completed. The councils should not accept those conclusions without scrutiny.

3. Biodiversity and ecological impacts

The site is not an empty or ecologically insignificant piece of land. The applicant's own report identifies native hedgerow Priority Habitat within the site and deciduous woodland approximately eight metres away. It also identifies two Local Wildlife Sites within 500 metres: Fenny Slade Hill and Plumbridge, Vault Hill and Little Beechill Woods. The site includes a pond and other habitat features.

Despite this, the report proposes to scope ecology and nature conservation out of the Environmental Statement, relying on the preliminary ecological appraisal and the conclusion that significant effects are unlikely.

That conclusion is premature. The ecological technical note identifies limitations to the surveys, including restricted access around the pond and to the house and garden, and limitations in inspecting trees for potential bat roosts. Bat activity surveys were still ongoing when the note was prepared. The assessment must therefore be based on complete and appropriately timed surveys, not preliminary findings.

The assessment should also consider the wider ecological network, not simply whether individual designated sites fall within an arbitrary distance of the development. The effects of lighting, noise, habitat fragmentation, air pollution and construction disturbance on wildlife must be examined.

The report itself acknowledges that the proposed development would result in a net loss of area-based habitats, with the shortfall potentially addressed through off-site provision or statutory biodiversity credits. Meeting a minimum biodiversity net gain requirement is not the same as protecting the existing habitats and wildlife of this particular location.

I ask that ecology is fully assessed in the Environmental Statement, with complete surveys, a clear assessment of direct and indirect effects, and evidence that avoidance and on-site mitigation have been prioritised.

4. Air pollution and the 72 back-up generators

The proposal includes 72 back-up generators. Although these are described as emergency equipment, they will also be used for routine testing and maintenance. Their emissions could include nitrogen oxides and particulate matter, with potential effects on people and wildlife.

The report acknowledges that the eastern part of the site lies within Enfield's borough-wide Air Quality Management Area, declared for nitrogen dioxide and PM10. It also recognises that generator emissions have the potential to cause significant air quality effects.

Nevertheless, the applicant proposes to deal with air quality through a separate assessment rather than a dedicated EIA chapter, and suggests that significant effects are unlikely.

I do not consider that this can be accepted without detailed evidence. The assessment must model realistic generator operation, including routine testing, emergency operation and the possibility of multiple generators operating simultaneously. It must examine effects on nearby homes, St John's Preparatory Nursery School, local roads and ecological receptors, as well as cumulative pollution from existing traffic and other combustion sources.

The fact that background pollution levels may currently be below particular standards does not, in itself, establish that additional emissions are harmless or that the development is acceptable.

5. Noise and disturbance

The data centre would operate continuously. Its cooling and ventilation equipment would run 24 hours a day, and the site would also contain transformers, generators and other substantial plant.

The acoustic technical note relies on baseline noise monitoring carried out at only two locations between 9 and 13 July 2026. The report identifies nearby residential properties and St John's Preparatory Nursery School as sensitive receptors.

The councils should require the applicant to demonstrate that the baseline surveys are representative and that the assessment properly considers night-time conditions, tonal and low-frequency noise, the combined operation of cooling equipment, generator testing and emergency operation, and construction noise and vibration.

It is not sufficient to assume that existing M25 traffic noise will make additional industrial noise insignificant. The impact of a continuous source of noise, particularly at night, needs to be assessed in its own right.

6. Energy consumption and climate change

The proposed grid connection of up to 150 MW represents a very substantial demand for electricity. The report refers to an IT load of 108 MW but does not yet provide the full information needed to understand the development's total energy consumption over its lifetime.

The Environmental Statement should quantify the expected operational electricity demand, the assumptions about capacity and utilisation, the likely carbon emissions over the life of the development, the embodied carbon associated with construction and infrastructure and the green carbon released during construction. It should also explain how the project's

energy requirements fit with national and local climate objectives and the need to decarbonise the electricity system.

The report recognises that data centres can contribute to local urban heat island effects through the release of heat from IT equipment and cooling systems. This is particularly important as summers become hotter and periods of drought more frequent.

The applicant refers to possible waste heat recovery, but acknowledges that the end user and operational arrangements are not yet confirmed. Any claimed benefit must therefore be assessed on the basis of what is actually deliverable. The Environmental Statement should include a realistic worst-case scenario in which there is no heat user or district heating network, rather than relying on an uncommitted future possibility.

The assessment should also examine the effects of heat rejection on local temperatures and the surrounding environment.

7. Water resources, drought and drainage

The report discusses flood risk and proposes to scope this topic out of the Environmental Statement on the basis that the site is generally at low risk of flooding. This does not answer the separate and important question of whether sufficient water will be available to support a development of this scale, particularly during increasingly hot and dry summers.

Data centres require water for various operational and cooling purposes. The applicant must provide clear figures for expected water demand, the cooling system to be used, the source of supply, and the likely demand during periods of peak summer temperatures. It should also assess the consequences for local water resources and other users during drought conditions.

The assessment should not assume that a low flood-risk classification means that water issues are unimportant. It must consider drainage, groundwater, infiltration, changes to land levels and the effects of extensive new buildings and hard surfaces, alongside future climate conditions.

8. Construction traffic and local impacts

The construction period is expected to last approximately three years. The report identifies a peak of up to 800 construction workers on site at one time. It also anticipates up to 100 HGV movements per day during the concrete foundation works and approximately 60 HGV movements per day during a later peak construction period.

These are substantial movements on local roads. The report’s reliance on percentage thresholds for identifying roads requiring assessment does not, by itself, demonstrate that the effects will be acceptable. The assessment must consider actual traffic volumes, HGV routes, congestion, road safety, pedestrian and cycle movements, and the effects on nearby residents and school users.

It must also examine the cumulative effects of other development and infrastructure works in the area, rather than considering the data centre in isolation.

9. The assessment of alternatives is inadequate

The report says that the Environmental Statement will consider the no-development scenario and alternatives considered during the design process. However, it also states that it is not necessary to consider theoretical alternatives that were not considered through that process.

I am concerned that this approach could result in an inadequate examination of whether this development needs to be built on this Green Belt site at all. The applicant should explain the reasonable alternatives it has genuinely considered, including suitable brownfield and existing employment sites, less environmentally sensitive locations, and options involving a smaller or less intensive development.

The need for data centre capacity does not automatically justify this particular location or the proposed scale. The environmental consequences of the alternatives should be compared transparently.

10. Cumulative and cross-boundary effects

The site straddles the boundary between the London Borough of Enfield and Hertsmere Borough Council. Its effects will not stop at the administrative boundary.

The assessment must consider the combined effects on communities, roads, wildlife, water resources and infrastructure in both areas. It should include relevant existing and reasonably foreseeable developments, electricity infrastructure and grid upgrades, highway works, and other data centre or industrial proposals.

It is essential that the two councils work together and that the Greater London Authority, National Highways and relevant environmental bodies are properly involved. The assessment must also consider the combined effects of noise, air pollution, lighting, heat, traffic and water demand on people and the natural environment.

What I am asking you to do

I would be grateful if you would:

1. **Oppose the proposed Junction 24 Data Centre development** and make clear that the need for data centre capacity does not justify the inappropriate loss of Green Belt countryside at this location.
2. **Press Enfield and Hertsmere Councils not to accept the proposed EIA scope without substantial revision**, and to require a comprehensive assessment of all potentially significant environmental effects, including their combined and cumulative impacts.
3. **Insist that the Environmental Statement is supported by complete evidence**, including full ecological surveys, robust air quality and noise assessments, a detailed assessment of water demand and drought resilience, and a transparent whole-life carbon and energy assessment.
4. **Require a proper examination of alternatives**, including suitable brownfield and existing employment sites, and a clear justification for the proposed scale and location.
5. **Ensure that the effects on local residents, schools, roads and wildlife are fully assessed**, with the involvement of both councils and the relevant statutory bodies.

I recognise the importance of digital infrastructure to the modern economy. However, that does not mean every proposed data centre should be accepted regardless of its location, scale or environmental cost. A development of this magnitude should be directed to an

appropriate site and should demonstrate that its impacts can genuinely be avoided or acceptably mitigated.

In this case, the proposed development would cause a profound change to Green Belt countryside, while the applicant's own scoping report identifies a number of significant potential impacts but seeks to exclude several important subjects from the main Environmental Statement. The planning authorities must not allow the assessment process to become a means of narrowing or minimising the issues that need to be considered.

I would appreciate your support in challenging this proposal and ensuring that the environmental and planning implications are properly examined before any decision is made.

Yours sincerely,

[Your name]
[Your address or postcode]