LBH Ref	Individual/ Organisation	Comments
1	Individual	I strongly disagree with these proposals. The land is greenbelt used for agriculture. The data centre would destroy and dominate the site and have a harmful effect on resources. It will not benefit the local community in fact the opposite would happen. The volume of traffic would increase to such an extent the local roads could not cope. The disadvantages far out weigh perceived benefits.
2	Individual	I am in approval of the proposed data centre in my local area because it represents an important investment in the future of our community. As technology continues to shape how we live and work, reliable digital infrastructure is becoming just as essential as roads, utilities, and public transport. A data centre helps support the systems that businesses, schools, healthcare providers, and everyday residents rely on. Having this kind of infrastructure nearby helps ensure that our area remains connected, modern, and prepared for continued technological growth. Another reason I support the development is the potential economic benefit it can bring to the region. Large infrastructure projects like a data centre create jobs during the construction phase and also provide long-term technical and maintenance roles once operational. Beyond direct employment, there are often positive ripple effects for local businesses such as contractors, suppliers, and service providers. This kind of investment signals confidence in the area and can help attract additional companies and innovation over time. I also believe that modern data centres are increasingly designed with efficiency and sustainability in mind. Many use advanced cooling systems, renewable energy sources, and energy-efficient technologies to minimise their environmental footprint. When developed responsibly and in partnership with the community, a data centre can operate while meeting strong environmental standards and contributing to broader sustainability goals. Finally, supporting this project reflects a forward-looking approach to development. Communities that embrace digital infrastructure are better positioned to support remote work, technological innovation, and the growth of new industries. By welcoming a data centre in the area, we are not only meeting current needs but also investing in the long-term resilience and competitiveness of our local economy.
3	Individual	I understand the concern with the Green Belt, but this is the kind of investiment that would be really benefical for the Borough, attracting investiment and creating jobs and as an Upminster resident I appreaciate and stand for it.
4	UK Power Networks	We note there are overhead cables on the site running within close proximity to the proposed development. Prior to commencement of work accurate records should be obtained from our Plan Provision Department at UK Power Networks, Fore Hamlet, Ipswich, IP3 8AA. In the instance of overhead cables within the vicinity, All works should be undertaken in line with GS6 guidelines as published by the HSE Should any diversion works be necessary because of the development then enquiries should be made to our Customer Connections department. The address is UK Power Networks, Metropolitan house, Darkes Lane, Potters Bar, Herts, EN6 1AG. You can also find support and application forms on our website Moving electricity supplies or equipment | UK Power Networks
5	Individual	As it is well documented that data centres use millions of litres of water per day, there should be details of where the contaminated water will be disposed and if there is a drought as there has been every summer for quite a while now, will the data centre get priority on water before Havering residents? It has also been noted that there is only one other country in the world with more data centres than us, and that is the USA. Do we really need another one?
6	Individual	This is GREEN BELT. It should remain farmland. There would be to much demand for water and electricity. The surrounding roads are narrow country lanes unable to cope with the massive traffic increase. Poĺution would increase. The carbon footprint would be massive. No real permanent economic benefit would be had localy or nationaly. The project is an enviromental disaster in these proposals as outlined above.
7	Individual	I am very concerned about the idea of this centre on green belt land because of the resulting loss of countryside, air quality and subsequent damage to our area. We do not want to live in a concrete jungle to make others richer and potentially to put us at risk Where is the traffic going? We in Upminster and surrounding areas will be experiencing traffic build up , fumes from the vehicles and in light of recent events in the Middle East a potential risk of a high risk facility. Also has anyone researched the potential health risks to local residents and future generations? We are not happy. We want the council to listen!!!!
8	Individual	This should not happen. It's green belt land which should be sacred. It's an eye sore to the area. This is not good for the environment.
9	Individual	I very strongly object to the data centre proposal. Designating green belt to this is absolutely outrageous and I'm furious our councillors are endorsing this despite opposition from conservative and labour councillors. We do not need the upheaval of this, and by that I mean the huge impact on the immediate residents and those in surrounding areas pre and post build with increase in traffic, noise and pollution which in turn will affect health physically and mentally. Equally the massive impact on green belt land - and its wildlife - that can never be reversed. I object very strongly to this - nobody in Upminster or Ockendon wants this.
10	Individual	I strongly object to the development of this site on Green Belt land, and the detrimental effect that it will have on the environment.
11	Individual	I reject this proposal as it has significant impact on protected green belt with irreversible negative impact on the wild life.
12	Individual	Strongly object to this monstrosity! Do not build on Havering land
13	Individual	Why why why do we need this absolute eyesore? The inly thing i can think of is a nice big back-hander to those involved in oushing it through. I hope you psy for it in tbe Mayym elections #corruption

14	Individual	I oppose centre due to being so close to residential areas. Plus this area is going to have major disruption with new Thames Crossing works. Data centre works will cause mayhem to residents within this area. We have had enough disruption already with traffic being diverted through Upminster/Cranham areas due to Gallows Corner repairs. Lastly there's enough fields in the middle of nowhere to build centre, without being an eyesore etc etc.
15	Individual	This Development must not proceed. The size of the structure is monstrous destroying a natural habitat and Green belt land. The resources needed to build it will bring years of disruption and have a massive negative impact on the surroundings. The power usage and heat generated by this does not really meet any so called Green credentials and the need for such a huge data collection and storage facility is just a tool to monitor and classify individuals in an orwellian way. I wholeheartedly disagree with this development and hope the council see sense in turning it down.
16	Individual	I totally oppose to this development as the land is green belt. The development will mean extra traffic, noise and pollution. It is totally unacceptable.
17	Individual	I oppose the data centre. This is a green belt area. The infrastructure can not cope with the building of this size. This is not in keeping with the semi rural area. It is detrimental to wildlife and residents. It will imapact the water supply. This negatively impact the town of upminster and south Ockenden. It will be better suited to a brownfield site not green belt.
18	Individual	I strongly object to the notion of the data center being built on this beautiful green belt land [redacted] and we all love the peace and serenity of the area the residents love the abundance of wildlife around us there's so many birds and creatures that live here why should they be uprooted from their natural habitats and left without homes and having to leave the area this country is sposed to be pro environment and this just proves the only thing anyof you care about is destroying the environment with your constant building of rabbbit hutch homes and huge monstrosities like this horrible data center you won't rest until the whole of havering is a huge third world concrete ghetto devoid of any sort of wildlife nature and greenery shame on you all
19	Individual	There are already issues surrounding the destruction of green spaces and wild life as well and the global rising issue of climate change. Why cause even more unnecessary damage to the already fleeting natural spaces we enjoy with family and pets. Furthermore, the 10 years of noise and disruption would impact thousands of people in the vicinity reducing the quality of life with sound pollution as well as depleting the habitats of the much loved animals in the uk. This is a ridiculous proposal.
20	Individual	This is a disgrace and should not be allowed to happen. Loss of countryside and ecosystems. Hundreds of thousands of insects, mammals and birds will be displaced, there are fewer and fewer places for them to go. And offsetting with fancy planting or a so called eco park is an insult, this is pure money and greed personified. The extra traffic will put pressure on the surrounding roads. Nobody wants this apart from those making money from it. The lower Thames crossing will be impactful enough and then this on top. Havering council is just destroying what once was a nice borough. There are buildings everywhere, stop it.
21	Individual	Objecting to the development of the data centre
22	Individual	We are against this data centre and the damage it will do to the local landscape and wildlife.
23	Individual	Sorry anywhere apart from green belt I strongly object building on green belt
24	Individual	I am writing to object to this proposal of building these data centres on greenbelt land, as they are an eyesore, and not what I would vote for if I had a choice. I'll be keeping a close tab on this as our votes in politicians are clearly not listening to the people in regards to this.
25	Individual	This proposed data centre is being built on green belt land which should be protected. The environmental impact will be significant and put a strain on the energy grid. Data centres use vast amounts of water and the proposed place of construction of such a huge data centre, ie south east england, is one of the driest areas of the country. This should not be built on the edge of London and use up vast amount of the countryside which will make the city sprawl feel even greater.
26	Individual	Green Belt Land is protected and should remain protected! Wildlife and wellbeing to our eco system will be severely impacted. Once sacred green belt starts to be built on there will be nowhere safe from building on. This is not the correct environment for this project. We were promised green belt would not be touched.
27	Individual	It should not be built on green belt land.
28	Individual	I absolutely object to this being built on our green belt land!! It will have a detrimental effect on everyone in the area. The amount of vehicles/lorry's will be an absolute nightmare and will be ongoing for months/years to build , let alone our poor wildlife which should also be protected 😖
29	Individual	We cannot destroy any more green belt . We already have the prospect all the disruption that the new Thames crossing is going to cause local residents in very close proximity to the new proposed data centre. The local roads are not strong or large enough to take the extra amount of construction traffic . The houses down clay tye road shake now when an arctic lorry passes. [redacted] The roads were not designed to take large or heavy volumes of traffic. Our green belt was named and protected for a reason. We've already had many major roads in the local area destroy it and what remains must be protected
30	Individual	I would ike to OBJECT To this data centre in its entirety. In the first instance the whole application process is unsatisfactory. It is unacceptable to use an LDO for development on greenbelt and the document that has been provided is far too long to properly evaluate in any meaningful way or with any degree of scrutiny. Local government guidance states : 'A fundamental component of delivering and developing a LDO is to ensure that there is effective engagement with all relevant stakeholders.' (Guidance to councils on Preparing LDOs section 3.3).

		My main OBJECTION on the grounds that this is green belt land. The area is still extensively farmed and there were numerous listed properties on the land which have now had their listed status removed? However my main concern is for the ecology of the area. Once the green belt is destroyed it is impossible to renew – badgers, foxes, 60-70 different species of birds, and frogs and newts in the ponds, etc. which will be threatened by building an enormous data centre. Extensive building works going on for 8-10 years (the developers estimate). Whilst I appreciate that data centres may be the future (at the moment!) a brown field site would be better.
31	Individual	The proposal would not benefit the local community in any way. Instead, it would cause noise & disruption and pollute the environment. We are already suffering from high levels of pollution coming from M25; the green belt absorbs significant amounts of that; it is important it stays. Alternative location for such a massive development should be sought that is further away from communities. We should be committed to maintaining and increasing the green spaces in and around the city to counteract the dangerously low quality of air.
32	Individual	To build anything of this size on Green Belt land is an infringement on our once Green and Pleasant land. At the end of the day how secure is the data held in such an eyesore. By the time this monstrosity is built new technology will be available making this establishment obsolete. For the people who live in the area it is an unfair encroachment on their lives. I am sure that IF such an establishment is required to be built, more thought should be put into a more sensitive site ie brown fill, and the feelings of local residents and tax payers taken into consideration. surely a more isolated area would be better, rather than amongst a community. I STRONGLY OBJECT TO THIS PROPOSAL
33	Individual	We don't want a data centre, we want to protect the green belt which is so prescious to the area and environment in general. The centre will use extreme amounts of water and natural resources as well as not adding any improvements to the local area and communities. We whole heartedly reject this proposal and will be following this closely.
34	Individual	I am greatly concerned that green belt is the proposed site for this colossal data centre. The green belt is London's lungs. We need to ensure spaces close to London retain wild life and natural habitat. This proposal will increase traffic, destroy many natural habitats for wildlife and adversely affect the surrounding area. It is not possible that this huge centre can be truly sustainable. It will contribute significantly to chemical and noise pollutants. Suggestions have been made to build on existing brown sites rather than destroy our green belt. I fear this proposal in Havering will be the start of a gradual irreversible erosion of the green belt which will negatively impact all Londoners and have a wider impact on the environment. Please reconsider.
35	Individual	I do not agree
36	Individual	I completely oppose this data centre which will destroy the local green space and also downgrade the value of homes around that area due to the noise pollution it is going to cause. Economically this makes no sense for people living in havering.
37	Individual	Hello, The noise pollution (data centers generate noise levels that may exceed 90 decibels. Noise levels above 85 decibels are harmful to hearing.) and distribution to wildlife would be catastrophic. Upminster and North Ockendon is so lucky to be right next to the greenbelt and it attracts many residents to the area to visit places like Belhurst and Thames Chase. The noise (which studies have shown can be heard from up to 2 miles away) and light produced by the data centre would cause changes in wildlife patterns and possibly cause migration away from this area, damaging the ecosystem even further. Data centres are a massive drain on energy and water resources, these centres are not renewable and move the country further from nation's sustainable goals and development. The site is already next to the M25 which is a site of massive pollution but this data centre will massively increase it and affect the lives of those residents especially in Upminster who are paying the cost already by the extended ULEZ zone. There is no benefit for local community and would cause many costs for which the residents will have to pay for. Whether through increased taxes, increase bills or through reduced visitors to the parks, forests and towns- which directly affects the economy. Finally the greenbelt is protected land. The use of this space for data centres is the complete opposite of its intended purpose.
38	Individual	I object
39	Individual	I wish to object to the proposal. The scale and impact of the development is totally unacceptable. This is being built on green belt land stands for the erosion of the protection that prevents over development. Having planning needs to standup and represent their community.
40	Individual	Please NO to proposed data centre. People have paid premium rates on homes to live in Upminster and surriounding countrified areas of Havering so stop trying to turn beautiful countryside into industrial looking areas .....theres enough of that in other neighbouring boroughs .....there will be destructiin to wildlife which is already in decline, 10 years of noise and mayhem .....take thus build elsewhere to a patch of land that might benefit from a better view than alreafy has i.e thurrock by Ocardo..... looks like a duming ground for old cars and lories and tyres .....it probably would benefit with generel clean up involved in new build if DC
41	Individual	I don't believe anyone really thinks this is desirable. Consultation is a fraud, as it has already been decided that this will go ahead.
42	Individual	I think the data centre is much needed! It will bring jobs, help with the massive amount of data everyone is using and I look forward to seeing the new nature park they will make too. In a world of technology, the data centre is very much needed!
43	Individual	I'm concerned about the impact on local water resources. Having seen new stories about huge data centres impacting water resources elsewhere, I wonder what the impact will be for Essex and specifically Havering and Thurrock.
44	[redacted]	As a small business in havering we can only see positive outcome from having this data centre built, i have heard 1st hand the plans for the data centre, the energy, the water and how littel it will effect the environment.

		As a business in havering being invikved in this project would have a life changjng impact for us as a business and those we can recruit from within the community, we would be able to guarantee people work for life.
45	Individual	I am AGAINST this proposal. The greenbelt land should be left alone. The developer should seek out brown-field sites to re-purpose rather than open countryside. The area does not have the infrastructure for such a project. The claims of job creation are massively over exaggerated. Data centres require minimal staff and with AI and automation will require fewer and fewer. Any personnel on site will be temporary and travel in for new equipment installation/maintenance. There are many sites in Havering that could be used which do not involve the destruction of countryside. For example the land to the front of Queen's Hospital which has stood empty for many years. This proposal should be thrown out at the earliest opportunity.
46	Individual	I feel the benefits of this project is greatly outweighed by the lack of employment in relationship to slze. The environmental problems, water, power , noise and generally the look a "warehouse". If this was going to offer real skilled jobs with the knock on of more being made i would be up for it but it just going to be a big warehouse.
47	[redacted]	This will be an amazing endeavour and undertaking for the council and our local communities and economic development.
48	[redacted]	Against
49	[redacted]	Very excited to have this new addition to havering. Will bring in jobs and business to the area
50	Individual	I fail to understand why Havering Council would give approval to this Data Centre when it would cause catastrophic traffic congestion within Upminster and the surrounding area. Traffic in Upminster has massively increased over the past year (Gallows Corner flyover construction and the Travel Lodge building works) and will increase even more with the construction of the Lower Thames Crossing. Once up and running the Travel Lodge traffic alone will bring even more congestion to what was once a very pleasant town to live in. I would like to think Havering Council will reconsider the implications of allowing this Data Centre to go ahead!!
51	Individual	This is a huge area of green belt land and fen land. No pavement, it is a very narrow lane not suitable for continuous heavy lorries for next 10 years. Unsightly huge buildings creating heat and noise (hum). Taking large amounts of water and electricity from the area. An environmental disaster which does not benefit the community and wildlife. We already have the new Thames Crossing devastating the countryside around Ockendon and now this HUGE monstrosity that has no benefit to the community.
52	Individual	I understand this development is large and would cause a massive increase in traffic. Also the pollution would be greatly increased. I strongly object to this development
53	Individual	There is no local benefit to a data centre. They consume vast quantities of energy and fresh water, they emit a constant noise, employ very few people once built. There is zero benefit to the people, area or environment.
54	Individual	I object to this development for the reasons given below. Should this data centre go ahead as planned then it will have a considerable impact on the environment and nature. Data centres are well known to be massive users of both electriity and water. On the first issue of electricity, the amount of electricity constantly required to be generated to serve the data centre, will have a significant environmental impact through the emission of green house gases. On the issue of water use, as our summers, particularly in the south east of the UK, seem to get ever hotter and ever drier, water is becoming an increasingly scarce resource. The volumes of water that this centre will constantly use will put excessive demands on our water supply at a time we can least afford it. Finally, it is proposed that much of this data centre will be built on much valued green field sites. This council constantly talks about how it is supporting the environment and nature but this is nothing more than a thin veneer. The projects that really matter as having significant impacts on both, it is the council that is only too keen to support them. As well as this data centre example another is the new SEND school which is to be built on the green space behind what was Gidea Park library. For once recognise the environmental damage these projects will cause and stand up for the environment and nature by rejecting them.
55	Individual	I am strongly against the proposal for the East Havering Data Centre
56	Individual	I strongly disagree with the East Havering Data centre this would spoil the area.
57	Individual	This datacentre will bloat the Green belt, cause environmental damage to the area due to increased traffic , excessive increase in power usage and excessive usage of water
58	Individual	1. Introduction I am a resident of the London Borough of Havering and wish to register a formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO). While I recognise the importance of digital infrastructure to the UK economy, the proposed mechanism and location raise serious concerns in relation to: • Green Belt protection • environmental impact • infrastructure capacity • planning governance

		• the strategic use of land within the borough. In particular, the proposal seeks to grant long-term permitted development rights for a large-scale data centre campus through a Local Development Order, potentially enabling development of up to approximately 400,000 m^2 of floorspace, including around 340,000 m^2 of data centre use, alongside other associated infrastructure and facilities. This represents a development of regional significance and should therefore be subject to the full scrutiny of the planning application process, rather than being effectively pre-approved through a broad LDO framework lasting many years. 2. Misuse of the Local Development Order Mechanism The use of a Local Development Order for a development of this scale is deeply concerning. LDOs are typically intended to facilitate minor or routine forms of development, streamline small-scale regeneration, or support development within clearly defined parameters. However, the proposed order: • permits development across multiple build zones • enables a large-scale campus-style development • operates across multiple phases over a potentially long period • allows significant future development without individual planning applications. The effect is that once the LDO is adopted, substantial elements of the development may proceed with limited future democratic scrutiny, subject only to prior notification or condition discharge procedures. This approach risks: • undermining public confidence in the planning system • preventing residents from meaningfully scrutinising future phases of development • reducing oversight of cumulative environmental impacts. Given the strategic scale of the proposal, the development should instead be considered through individual planning applications, enabling proper assessment of each phase and ensuring accountability. 3. Conflict with Green Belt Policy A central concern is the potential use of Green Belt land for this development. National planning policy provides strong protection for Green Belt land, recognising its importance in: • preventing urban sprawl • safeguarding the countryside from encroachment • preserving the character of towns and villages • providing open space for communities. Large-scale industrial development within the Green Belt is normally regarded as inappropriate development unless very special circumstances can be clearly demonstrated. In this case, the justification appears weak for several reasons. Lack of site necessity There is insufficient evidence that a development of this nature must be located on Green Belt land. Data centres are commonly developed on: • brownfield sites • former industrial land • logistics or infrastructure zones. Given the scale of development proposed, it is reasonable to expect that alternative brownfield sites should have been rigorously assessed before proposing development on protected land. Permanent land-use change The development would introduce large-scale built infrastructure into what is currently open land, resulting in permanent alteration of the landscape. Unlike many forms of temporary development, data centre infrastructure is typically long-lived and difficult to reverse, meaning the impact on the Green Belt could be effectively permanent. 4. Environmental and Landscape Impact The proposal also raises significant environmental concerns. While the consultation documents include references to landscaping and ecological mitigation measures, such mitigation cannot fully compensate for the loss or transformation of open land. Large data centre campuses typically introduce: • extensive buildings and plant equipment • high levels of external lighting • mechanical cooling infrastructure • security fencing and controlled access points. These features fundamentally alter the visual character of the landscape. Although the proposal includes an ecology park and landscaping measures, such interventions should not be treated as equivalent replacements for natural landscape or biodiversity value. There is also a risk that ecological measures may be implemented later in development phases, meaning environmental benefits could be delayed or reduced relative to the immediate impact of

		construction. 5. Infrastructure and Energy Demand Data centres are among the most energy-intensive forms of development. A campus of the scale proposed would require extremely significant: • electrical grid capacity • cooling infrastructure • utility connections. The consultation documents indicate the presence of a district heating energy centre and associated infrastructure, suggesting substantial supporting energy facilities will be required. However, there is limited clarity regarding: • how power demand will be supplied • whether local grid infrastructure can support this demand • the potential impact on energy resilience within the region. Without detailed analysis, there is a risk that the development could place considerable pressure on local infrastructure networks. 6. Transport and Travel Assumptions The Travel Plan indicates that staff access to the site will rely heavily on private car use, reflecting the limited public transport connectivity of the proposed location. This raises concerns about: • increased traffic on rural roads • congestion during construction phases • environmental impacts associated with car dependency. Major developments in areas with limited public transport provision should be carefully assessed to ensure transport impacts are properly mitigated. 7. Limited Local Economic Benefit While digital infrastructure is important nationally, large data centres typically generate relatively limited local employment once operational. Compared with other forms of development occupying comparable land areas, the employment density of data centres can be low. This raises a strategic planning question: Is it appropriate to allocate large areas of land — particularly protected land — to development that may provide relatively limited long-term employment or community benefit? This question becomes particularly important when considering the opportunity cost of land use, especially where alternative development opportunities might deliver greater social or economic value. 8. Governance and Amendment Mechanisms The consultation documents indicate that the LDO framework includes mechanisms allowing: • prior notification procedures • discharge of conditions • non-material or minor material amendments. While such mechanisms are common within planning frameworks, their use within a large-scale LDO development raises concerns about transparency. Significant design changes could potentially occur without full public consultation, limiting the ability of residents to review future alterations to the scheme. 9. Strategic Planning Considerations The proposal must also be considered within the wider strategic planning context. The London Plan emphasises: • sustainable development • protection of open space • careful management of infrastructure demand. Large data centre developments should ideally be located in areas where: • energy infrastructure already exists • transport connectivity is strong • environmental impact can be minimised. The proposed location appears to struggle to meet several of these criteria. 10. Conclusion For the reasons outlined above, I strongly object to the proposed East Havering Data Centre Campus Local Development Order. In summary: • The Local Development Order mechanism is inappropriate for a development of this scale. • The proposal risks inappropriate development within Green Belt land. • Environmental and landscape impacts appear insufficiently justified.

		• The development may place significant pressure on infrastructure, particularly energy networks. • Transport assumptions rely heavily on private vehicles. • The local economic benefits appear limited relative to the scale of land use. Given these concerns, the council should decline to adopt the proposed Local Development Order and instead require that any development of this nature be brought forward through individual planning applications subject to full scrutiny. This would ensure that environmental, infrastructure, and community impacts are properly assessed before development proceeds.
59	Individual	Can I ask how noise pollution will be limited? There are reports of data centres in America that are so noisy, people miles away from the centre have trouble sleeping. That there is a loud constant hum like a jet engine.
60	Individual	Please stop spoiling our Green Belt
61	Individual	Whilst I understand the need for data centre development and have looked at the economic impacts of short and long term employment etc. from a safety, infrastructure, transport and resident attraction point of view this wholly doesn't work. You start to devalue the areas of havering that hold outstanding schools and you have a larger negative impact on the local economy longer term. Infrastructure there are multiple issues with transport. Country lanes and 'A' roads already can not cope with local business transport needs and amount of additional housing requirements. Are you going to spend and address the very critical road and transport consequences that this will bring to the area. There are much better more rural locations for this to be built I find it a complete lack of common sense to put it in such close proximity to m25, large suburban areas, and huge residency impact area
62	Individual	Rigorous Academic studies are already showing the negative effects of data centres on air quality in local areas which will only worsen if we start building more. It will disproportionately affect people in the local area, older individuals and also contribute to the local habitat having to move, potentially contributing to the decline of certain species in the local area. It's an anthropocentric idea, putting the desires of people who want to get richer from data centres and generative ai over the needs of the environment and the people living in the local area. It will also have an undoubtable impact on water for personal use in the area as the data centres need massive amounts to cool the servers, potentially putting up the price of both water and electricity for local people. Havering does not need a data centre, we need to have a proactive ecological perspective and put the needs of the environment and the local people first. They can jazz it up all they like with the other parts of the proposal like the horticultural aspect, it doesn't erase the fact a data centre is being built. They're just using that as filler to get the approval.
63	Individual	I object strongly to the destruction of our ancient Land of the Fanns landscape in favour of this ugly and massive energy consuming monstrosity. If the pursuit of the capture and control of our PERSONAL data and ever advancing technology means we destroy our natural environment, I think we need to step back and think again. The facts are these massive data centres are absolutely disastrous for the local environment. They place a huge strain on the power grid, emit high CO2 emissions, and require huge amounts of water usage for the cooling systems. For local residents, there will be additional noise pollution, the industrialisation of a beautiful green space, and the added traffic disruption during the long construction period. Data centres consume vast amounts of electricity, require back up diesel generators leading to air pollution, deplete the water resources and have a considerable impact on climate. With ever advancing technology, what is the shelf life of a data centre and is the short term cash incentive to local councils worth the destruction of our historic landscape for ever. The impact on local wildlife and fauna will be irreversible.
64	Individual	No Data centres are noisy and bad for the environment through heat emissions, micro particle emissions, noise etc They may create many jobs during construction but require fewer full time jobs when active - and no guarantee it will be for locals (there is mention of a coach run from Upminster station to the site which indicates it will easily mean jobs for out of borough people, jobs are also often specific/specialist so what is being done to train Havering residents to be able to even be able to fulfil such roles?) The sites also use huge amounts of resources - electric , what is being done so the site does not dominate the power and leave residents 'in the dark'? - water, these sites require massive amounts of water, where's it going to come from, how will you ensure it doesn't leave residents short/with low pressure? - we already suffer hosepipe bans etc so we don't have water to spare... Both the above will risk leaving residents as second class in terms of resources as the site will demand it is prioritised Additionally data centres have been linked to/accused of water pollution. During the evaporative cooling process, chemicals can mix with the water. These chemicals may then escape the system, often as part of excess liquid that is drained from the cooling systems after evaporation. This runoff can introduce pollutants into the surrounding environment. The disruption to build it will be large, with HGVs running and roads having to be widened - this a green belt land and much is nature/wildlife reserve (even if unofficial) - the 'ecology park' is a red herring to distract from the damage this site will inflict? And how quickly will the ecology park shrink, and/or premises close (like rainham marshes/bird) and/or the data centre need to expand (you have already said " The proposal is also in line with the national infrastructure policy of national government to help provide much needed data security for the UK" - this is only likely to grow and require more servers etc)? The borough/that area has also recently been subjected to extreme weathers at opposite ends of the year with tinder dry land in summer (which will only get worse from the centre heat) and heavy rain with flooding (I don't expect the centre will be collecting the rain in water butts for use in cooling) so where will all the displaced water end up? It's a small risk but if they catch fire they can be a huge issue not to mention explosive, what is being done to ensure there are sufficient fire fighting resources available (AT ALL TIMES) and that won't leave the borough residents short/exposed if required? All in, this is a terrible idea for a location for a data centre - if anywhere they should be placed near the coast with their own desalination set up and be required to use/develop wave energy to help with powering them (it'll also be useful to have the sea nearby for if they catch fire)

65	Individual	I do not agree to this. It will use a lot of water and where will we source it from? Absolutely no need of more data centres.
66	Individual	I think this will be a major step forward for Havering and really do believe this may save our Borough. We have lost so much over the last few years in the high street and local business. This is a much needed kick to put Havering back to being a prosperous and thriving place to live. This will also bring futher external trade into the Borough and help our Hotels and high streets. The employment and graduate employment would also help our kids for the furute. For me it is a great big YES.
67	[redacted]	I agree with this proposal.
68	Individual	I am against the building of the data centre
69	Individual	This is a terrible idea for havering. Data centres come with high cost on the local infrastructure mainly on the quality and availability of water. It is well known that properties near data centre campuses have dirty brown tap water as the data centers use majority of water. I see nothing in proposals to address this. Shame on the council for considering profit over residents health
70	[redacted]	As a local business owner in Havering, I strongly support this proposal. A £14.7 billion investment of this scale is a significant opportunity for the borough and could bring long-term economic benefits, including new jobs, business rates, and further investment into the area. Developments like this help strengthen the local economy and support small businesses by increasing economic activity across the borough. I am also encouraged by the inclusion of an Ecology Park and public green space, which helps balance development with environmental considerations. Overall, I believe this project could play an important role in securing Havering's long-term economic future.
71	Individual	As someone who works in Upminster, I strongly support this proposal. A £14.7 billion investment of this scale represents a major opportunity for Havering and could deliver long-term economic benefits for the borough, including new jobs, increased business rate revenue, and further investment in the local area. Developments of this size can help strengthen the local economy and support businesses by increasing economic activity across Havering. I am also pleased to see that the plans include an Ecology Park and public green space, which help ensure that environmental considerations are included alongside development. Overall, I believe this project could play an important role in supporting Havering's long-term economic future.
72	Individual	As someone who works locally in Upminster, I am supportive of this proposal. A £14.7 billion investment presents a significant opportunity for Havering and has the potential to bring lasting economic benefits, such as job creation, increased business rates, and further investment into the borough. Large-scale developments like this can boost the local economy and help support businesses by increasing economic activity in the area. I also welcome the inclusion of an Ecology Park and public green space, which show a positive effort to balance development with environmental considerations. Overall, I believe this development could make a valuable contribution to Havering's long-term economic growth.
73	Individual	As someone who works in Upminster, I would like to express my support for this proposal. An investment of £14.7 billion would be a significant opportunity for Havering and could provide long-term economic benefits, including new employment opportunities, additional business rate income, and further investment in the borough. Developments of this scale can help strengthen the local economy by encouraging more economic activity and supporting businesses across the area. I am also encouraged by the plans to include an Ecology Park and public green space, which help ensure that environmental considerations are taken into account. Overall, I believe this project could play a positive role in securing Havering's economic future.
74	Individual	Disagree with location as it will ruin the outlook of the area the local road are not suitable for the amount of construction traffic and the resulting traffic once construction is complete
75	Individual	Complete blot on the landscape if it goes ahead. Offering very few jobs and is not what the people of the area want. Plans need to be scrapped.
76	Individual	I am writing to formally object to the proposed development due to its significant and irreversible adverse impact on local biodiversity and noise disturbance, and protecting the natural environment The operation of this site will create excessive noise and light pollution, causing severe disturbance to neighbouring wildlife , altering breeding patterns, and reducing habitat quality.
77	Individual	I support the proposal, this land is not used for anything useful & the development will create an employment opportunities. It is about time younger people got a say in the future rather than people who object to every development.
78	[redacted]	[redacted] and seen so many changes in those years. I have been aware of the proposed Data Centre for some time and think as a London borough we are so lucky to have this opportunity fall into our laps with the huge benefits it will bring to the local economy. I understand that, like most major projects of this scale, it will impact on some local residents but I believe this is a once in a lifetime opportunity for LB Havering and we should not let it slip through our fingers.
79	Individual	[redacted] I can personally see the benefits the Data Centre will bring. Not only in the form of much needed data infrastructure and potential district heating system etc.but also jobs, skills and education opportunities for local residents and especially young people. There is also the opportunity for local businesses to engage in the project supply chain and innovation - enabling the local economy to grow and thrive throughout the entire long term course of the project. There is also the potential for additional inward investment via specialist sector companies and the additional business that may come to Havering given faster and world leading data connectivity.
80	Individual	Reject such a proposal. Data centres are ghastly pieces of architecture dressed up as technological advancements. Awful idea, heavily polluting our environment and an eyesore. We do not want more AI slop being generated from our beautiful havering. Ruin local estate prices too
81	Individual	Dear Havering Council I am writing to formally object to the planning application for the proposed data centre development at Ockenden While I recognise the growing importance of digital infrastructure, I have several significant concerns regarding the potential impact of this development on the local area: Firstly, the scale and design of the proposed data centre appear out of keeping with the character of the surrounding environment. The visual impact of such a large industrial structure could detract from the landscape and adversely affect nearby residential and natural areas.

		Secondly, there are concerns regarding environmental impacts, including increased energy consumption, heat generation, and potential effects on local biodiversity. The proposal does not appear to sufficiently address how these issues will be mitigated in a sustainable manner. Additionally, the development is likely to place further strain on local infrastructure. Increased traffic during both construction and operation phases, as well as potential pressure on power and water resources, could negatively affect the existing community. Noise pollution from cooling systems and backup generators is also a concern, particularly for nearby residents, and it is unclear whether adequate measures have been proposed to minimise disturbance. Given these concerns, I respectfully request that the application be carefully reconsidered or refused unless the applicant can demonstrate that these issues will be fully and effectively addressed. Thank you for taking the time to consider this objection.
82	Individual	The Data Centre has no place on Green Belt Land. There's enough remote fields for this to be built elsewhere. Cranham has a large community of retired people & all this disruption is not how we anticipated [redacted]. Heavy goods vehicles, dust & dirt is NOT acceptable. Also MANY school along the route. HAVERING COUNCIL should be protecting Land & Residents.
83	Individual	The location is completely in practical. Traffic is always bad and you will make it worse. Lorries using narrow country lanes which can barely take two cars at the best of times. Why build near properties and golf course. Why cant you build where there is no population and in an empty field. What happens when A127 and M25 are congested which they always are! It is just waiting for an accident. Dont know why you put to consultation when this is going to happen anyways. You dont think of the local impact or even the wildlife. Totally oppose this!
84	Individual	I wish to formally object to the proposed East Havering Data Centre Campus under the draft Local Development Order. While I recognise the importance of digital infrastructure, the scale, location and cumulative environmental impact of this proposal raise serious concerns that outweigh any perceived benefits. 1. Exceptional Scale and Industrialisation of the Area The proposed development spans approximately 400,000 square metres, representing a vast industrial complex rather than a modest infrastructure project. This scale is comparable to major logistics hubs and would fundamentally alter the character of North Ockendon. Such a large concentration of data centre buildings risks creating an industrialised zone in what is currently a more open and semi-rural environment, leading to visual intrusion, loss of openness, and permanent landscape change. 2. Loss of Greenfield Land and Irreversible Change The development would result in the permanent loss of a substantial area of undeveloped land. Once built, this land cannot realistically be restored to its original ecological or agricultural state. This raises serious concerns about long-term land stewardship and the cumulative loss of green space across the region. 3. Environmental Impact and Biodiversity While the inclusion of an "Ecology Park" is noted, this does not offset the loss of established ecosystems across such a large footprint. Developments of this scale risk: • Habitat destruction and fragmentation • Displacement of wildlife • Long-term reduction in biodiversity Mitigation measures should not be used to justify avoidable environmental harm. 4. Energy Demand and Carbon Impact Data centres of this size require enormous and continuous energy supply. A campus of 400,000 square metres will place substantial demand on infrastructure and may significantly increase carbon emissions. This appears at odds with the UK's commitments under the Climate Change Act 2008 unless it can be unequivocally demonstrated that the site will operate on fully renewable energy without reliance on offsets or fossil fuel backup systems. 5. Water Use and Heat Output The cooling requirements for a facility of this scale will be considerable, raising concerns about: • Pressure on local water resources • Heat discharge into the surrounding environment • Sustainability during periods of water scarcity These are long-term operational impacts that require far greater scrutiny. 6. Noise, Air Quality and Community Impact With infrastructure operating 24/7—including cooling systems and backup generators—residents may be exposed to: • Continuous background noise • Potential air pollution from diesel generators • Reduced quality of life Given the scale of the site, these impacts are unlikely to be negligible. 7. Use of a Local Development Order (LDO) Granting permission through a Local Development Order for a development of this magnitude raises concerns about reduced scrutiny. A project of this size—covering 400,000 square metres—

		warrants full, case-by-case planning consideration rather than a streamlined mechanism. 8. Limited Local Benefit Despite its size, a data centre campus typically provides relatively low long-term employment. This creates an imbalance where the local community bears significant environmental and visual impacts without proportional economic benefit. Conclusion This proposal represents a large-scale industrial development of extraordinary size, with long-lasting environmental, infrastructural and community consequences. I urge the Local Planning Authority to reconsider whether this is an appropriate location for such a development and to prioritise sustainable land use, environmental protection, and the wellbeing of existing communities
85	Individual	No one wants a data centre. Allowing this to go ahead will prove that all you care about is private companies and share holders. Listen to residents, and do not allow this.
86	Individual	I wish to express my objection regarding the proposal of the data centre on such beautiful green belt land - we need to keep our precious green area's for the sake our own wellbeing and the wildlife. The disruption to the local area for many years whilst it is being built will be awful in already small and most importantly quiet parts of our area. This won't bring many jobs to the area apart from during construction which is temporary. I feel very strongly that greenbelt land should not be used for such things especially when there is plenty of brown belt land unused and derelict causing eyesores in those areas. Please do not let this go ahead and destroy another beautiful area.
87	Individual	I strongly oppose the data centre due to the water requirements and that it is on green belt land.
88	Individual	Green belt land shouldn't be used to build on. I would question if this is the most suitably location in regards to availability of water and backup reserves.
89	Individual	[redacted] am in favour of this development it will bring much needed investment into the borough, and uk economy. [redacted] this is a fantastic opportunity for employment both during construction and for our children's future. The huge outdoor green space that would be gained for public use is something my family would enjoy the benefit of. Given the development around the area both past and present it seems to be well situated.The plans look to be sympathetic to screen the buildings and blend the green spaces. I hope it goes ahead!
90	MET Police Designing Out Crime Officer Met Police	I have been involved in reviewing the proposals for this development and have provided initial Secured by Design recommendations, alongside engagement with the applicant team and their appointed security consultant. It is understood that a Secured by Design condition will now be incorporated, which is welcomed. Secured by Design will continue to support the project as it progresses and I look forward to further engagement with the team responsible for developing the site-wide security strategy. Given the scale and significance of this development, it is important that security principles are embedded at the appropriate stage to ensure a coherent and effective outcome. My contact details are provided within this submission and I would welcome being included in any future discussions relating to security. I am keen to work collaboratively to ensure that the development achieves a robust and appropriate level of security in line with Secured by Design principles.
91	[redacted]	[redacted], [redacted] we hereby provide strong support to the plans and application. This is a generational opportunity for the Borough to benefit from decades of economic growth and innovation that this project will deliver. The prospect that an opportunity of this magnitude not being approved, and another part of the UK - or Europe - benefitting instead, would be a significant miss for the long term prosperity of Havering.
92	Individual	This is green belt land, the irony that a water guzzling, nature destroying, habitat ruining monstrosity is proposed is beyond belief!! Why on build this on the many many acres of grey belt land? Or in Scotland where water supply is abundant?? Essex and the SE has huge water supply issues in the summer already, will a massive data centre improve this or exacerbate it?? Havering councils own 2023 report concluded it would irreversibly destory the environment, so why has it even got this far? A few trees and landscaping around the site to balance this is absolutely laughable. What about the badge sets your destroying? As for the 2000 or so job creation this is nonsense- these are low paid building jobs only needed while the propose centre is being built. They are no long term skilled jobs the area needs. How many people does it actually take to run a data centre- I'd guess 10-20 max. A far cry from the click bait thousands of jobs. Totally inappropriate development I wholly object to. Shame on the HRA for supporting it
93	Individual	Letter to follow.
94	Individual	[redacted] and have seen lots of attempt,s by developer's to infiltrate the area , this development is beyond belief and cannot allow such an ugly Amount of building,s to blot the landscape ! This development is not below horizon level and will be observed from miles away Green belt it is not and it will set a presidense for more projects , this is why our locals have always been against such works . it cannot be turned into an industrial area !
95	Individual	I fully support the building of this DataCentre which should go ahead forthwith. I believe it will be a fantastic addition and benefit to The London Borough of Havering, and all objections should be completely rejected.
96	Individual	The data centre proposal is a complete mistake. We shouldn't be building anything on prime Greenbelt land it's just Ludacris ! The whole thing has been rushed and we need to find a much better location if it is to go ahead not where it is currently being planned. We are in a nature and biodiversity and climate crisis. This is the complete opposite of what we should be doing..
97	Individual	As the Greater London Authority considers Cranham Marsh as a Site of Metropolitan Importance for Nature Conservation, I would like to be assured that the Environmental Impact Assessment for situating the East Havering Data Centre would not restrict the water courses that feed into the Marsh. My concern is that, following the construction of the M25 motorway, some of the water

		courses no longer flowed into the Marsh. Any additional restrictions on the flow of water could seriously damage the Marsh, which together with expected hot dry summers, would most likely result in the loss of this ancient marsh, sedge fen, damp meadow and wet woodland. Under the main considerations for this development it states that if the proposed development would result in harm to a designated heritage asset, which I believe the Marsh to be, then if public benefits are considered sufficient to outweigh that harm, the heritage asset could be lost. Whilst the documentation makes mention of Cranham Marsh, I would like to be assured that due consideration will be given, where possible, to reduce or off-set any likely significant adverse environmental effect on Cranham Marsh.
98	Individual	Sections 11.9 and 11.11 of the statement of reasons refer to documents produced by Digital Reef including a report by Oxford Economics. They also refer to scrutiny of these documents. I have asked several questions of borough councillors in relation to the claims made in these documents and have not received an adequate resposne. Could LBH please provide me with details of the scrutinty undertaken
99	[redacted]	As the proud representative organisation of the Havering business community, [redacted]) is writing to express its strong support for Digital Reef's East Havering Data Centre Campus. This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project stands to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. We believe the data centre will act as a catalyst for broader business opportunities from supply chain involvement to partnerships in skills development and digital capability-building. Its presence will help foster a stronger ecosystem of innovation, attract further investment, and enhance the borough's competitiveness on a regional and national level. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy.
100	Individual	Excellent proposal, we must encourage datacentre and other opportunities within the borough to increase employment opportunities and Datacentre is the new power house for growth with AI. Very happy to see the proposal and keen to see developments in the borough for better future
101	Individual	I am very concerned about the building of this data centre on green belt land, is there no brown field site more suitable. At a time when supply chains are under more threat than ever, the natural world is under intense pressure, the concept of allowing green belt land to be built upon seems incredibly negligent. Today the United Nations has issued a report on the accelerated heating of the planet which again flies in the face of your approach to build on green belt. I could further quote recent findings on how England is one of the poorest biodiverse countries in Europe, will destroying more green belt ease that situation, of course it won't! Your assessment has loss of agricultural land as permanent with a moderate impact and once complete the loss of open rural character is classed as moderate to major. During and post completion, the impact of road traffic noise is classed as major, these seem major issues all for the sake of a data centre that should be built on brown field sites and I am incredulous that such a site does not exist. Please protect rather than destroy our natural world.
102	Individual	East Havering Data Centre LDO (North Ockendon) I write to formally object to the proposed Local Development Order (LDO) for the East Havering Data Centre at North Ockendon. This objection is grounded in concerns relating to procedural fairness, policy compliance, environmental impact, and fundamental strategic misalignment. This response is not a generalised opposition to data centre infrastructure. It is a targeted challenge to the appropriateness of this development in this location, via this mechanism, and under this level of scrutiny. 1. Inappropriate Use of Local Development Order (LDO) The use of an LDO for a development of this scale and complexity appears fundamentally misapplied. LDOs are intended to simplify planning for predictable, policy-aligned, and low-impact development. This proposal is none of those things. It is: • A hyperscale data centre of national significance • Located within designated Green Belt • Dependent on extensive energy, water, and transport infrastructure • Environmentally and operationally complex The LDO mechanism removes the requirement for a full planning application and therefore eliminates the iterative scrutiny typically applied to developments of this magnitude. Key question: What is the planning justification for using an LDO instead of a full planning application, given the scale, sensitivity, and controversy of the proposal? Without a clear and robust answer, the process risks being perceived as an attempt to circumvent proper scrutiny, rather than facilitate appropriate development. 2. Failure to Justify Green Belt Development The site lies within the Metropolitan Green Belt. Under the National Planning Policy Framework (NPPF), development in the Green Belt is inappropriate unless it meets strict exceptions or demonstrates "very special circumstances" (VSC). A hyperscale data centre does not fall within any standard exception. Therefore, the proposal must clearly demonstrate that: • The benefits clearly outweigh the harm to the Green Belt and any other harm At present, this test appears unmet. Harm is substantial and includes: • Loss of approximately 99 acres of open Green Belt land • Visual and landscape degradation • Potential ecological impacts, including proximity to Sites of Importance for Nature Conservation

		• Industrialisation of a semi-rural setting Claimed benefits are weakly evidenced: • Data centres typically generate limited long-term employment relative to land take • Economic uplift claims are not quantified in a way that allows meaningful comparison • Environmental claims (including biodiversity net gain and carbon mitigation) remain high-level and unproven Key question: Where is the quantified, evidence-based assessment demonstrating that benefits clearly outweigh Green Belt harm, as required by the NPPF? Without this, the proposal is in direct conflict with national policy. 3. Inadequate Consultation Period and Procedural Fairness The consultation period of approximately 28 days is insufficient for a development of this scale and technical complexity. The consultation must satisfy the Gunning Principles, which require: • Adequate time for stakeholders to understand and respond to proposals • Sufficient information to enable informed feedback This proposal involves: • Environmental assessments • Energy and grid infrastructure considerations • Hydrological impacts (including potential effects on the River Mardyke) • Transport modelling • Carbon and sustainability claims It is not reasonable to expect residents, stakeholders, or technical consultees to meaningfully interrogate this volume of material within such a constrained timeframe. Key question: How does the council consider a 28-day consultation period to be adequate for a project of this complexity, and what assessment has been made of consultation fairness? Failure here exposes the process to challenge on procedural grounds. 4. Environmental and Infrastructure Uncertainty The proposal raises multiple unresolved environmental and infrastructure concerns: Water and Hydrology • Data centres require substantial water for cooling • Potential impacts on local watercourses, including the River Mardyke • Flood risk implications remain unclear Energy Demand • Hyperscale data centres require extremely high electrical loads • The source of this energy, grid capacity, and reinforcement requirements are not clearly defined Carbon Impact • Claims of “net zero” or sustainability are not supported by detailed lifecycle analysis • Embodied carbon and operational emissions appear underexplored Noise and Air Quality • Continuous plant operation introduces long-term noise impacts • Construction impacts over a decade-long build period are significant Key question: Where is the comprehensive, independently verifiable evidence demonstrating that these impacts are fully understood, mitigated, and policy-compliant? An LDO assumes these issues can be resolved in advance. Current evidence suggests they are not yet resolved. 5. Fundamental Spatial Misalignment This is perhaps the most critical flaw in the proposal. Data centres are not passive developments. They are: • High-energy users • Significant producers of waste heat The proposal references the potential for a district heating network. However, the site is located in a low-density, semi-rural area with limited proximate heat demand. There are no significant residential or commercial clusters nearby capable of utilising this heat at scale. This creates a fundamental contradiction: • A key sustainability benefit (heat reuse) is claimed • The spatial context makes that benefit largely unachievable

		Key question: Who are the identified end users of the proposed heat network, and what evidence demonstrates that heat recovery is viable at this location? If this cannot be answered with specificity, the sustainability case is materially weakened. 6. Transport and Accessibility Constraints The site is not well served by public transport and relies heavily on road access. The development implies: • Significant construction traffic over an extended period • Ongoing operational vehicle movements This raises concerns regarding: • Highway capacity • Road safety • Increased reliance on private and freight vehicles • Conflict with sustainable transport objectives Key question: What evidence demonstrates that the local transport network can accommodate this level of activity without significant adverse impact? 7. Precedent and Policy Integrity Approving a development of this nature on Green Belt land via an LDO risks setting a significant precedent. While each planning decision is technically case-specific, in practice such approvals: • Influence future policy interpretation • Reduce the defensibility of Green Belt protections elsewhere Key question: How will the council ensure that approval of this scheme does not undermine the integrity of Green Belt policy in future decisions? 8. Governance and Transparency There are concerns regarding the level of early engagement and transparency in the development of this proposal. For a scheme of this scale, best practice would involve: • Early-stage public engagement • Iterative consultation • Clear communication of alternatives considered Instead, the process appears compressed and reactive. Key question: What alternative sites were assessed, and why was this Green Belt location selected over more suitable brownfield or industrial locations? Conclusion This proposal presents a convergence of concerns: • An inappropriate planning mechanism (LDO) • Conflict with Green Belt policy • Insufficient consultation • Unresolved environmental impacts • A fundamental mismatch between development type and location At its core, the proposal appears to be land-led rather than infrastructure-led, prioritising site availability over system integration. The absence of nearby heat demand alone calls into question one of the primary sustainability arguments supporting the scheme. Taken together, these issues indicate that the proposal is not yet robust enough to justify approval. Final Position For the reasons set out above, I object to the proposed LDO in its current form. At a minimum, the council should: • Withdraw the LDO approach • Require a full planning application • Extend the consultation period • Provide detailed, evidence-based assessments across all impact areas • Reassess site selection against more appropriate alternatives Until these steps are taken, the proposal remains premature, insufficiently justified, and inconsistent with established planning policy.

103	[redacted]	I am writing to voice my support for this LDO application for the Data Centre Campus in East Havering. Data sovereignty is becoming more and more crucial, with global unrest making this an even more critical factor. Whether you like it or not, we require facilities such as these to protect our modern way of life, and ensure that we remain a first world nation. The siting on Green Belt land appears a necessary evil - given the power requirement, proximity to Warley Substation is obviously of great import. However, the developer going to the extent they have to hugely uptick the biodiversity with the ecology park is great to see. The farmland which will be lost is currently under monoculture arable crops, grown with a great deal of fertiliser and agrochemicals. This land is not biodiverse. Anything but. However, creating an ecology park which will be free of these synthetic inputs will enable biodiversity to return in abundance to this area. Resulting in a huge uptick on what is currently present. As an added bonus, the park being open access will be superb for the residents of Havering to actually be able to enjoy walking amongst nature right on their doorstep. [redacted] I am heartened to hear that much needed road improvement works will be commencing. Havering has required extensive investment for some time, and this finally seems to be the development which will improve the area and make Havering a place to be proud of for generations to come.
104	Individual	I am in favour of the data centre due to the level of investment it will bring into Havering.
105	[redacted]	Promotes jobs in the area
106	[redacted]	This is a fantastic opportunity for the local and surrounding areas, offering new jobs, skills training and new employment for local people. With new and significant investment for the region this is a project we fully support.
107	Individual	I object to this proposal on two grounds. Firstly, once again, owing to policy decisions made by central government, more financial pressure is being put on the council. This is forcing it to seek ever more desperate opportunities to raise funds, resulting in Havering residents picking up the tab in both monetary terms and in regard to the detrimental effect it is having on their way of life. Secondly, I believe we should be doing more to preserve our precious green spaces, and making greater efforts in finding brown or grey field sites for this type of development.
108	Individual	Data centers are causing significant environmental damage through their massive energy and water consumption, greenhouse gas emissions, and impact on local communities and ecosystems. Energy Use & Emissions: Data centers consume 32% more electricity than all of Britain and account for 1–1.5% of global electricity use. The International Energy Agency (IEA) estimates they are responsible for nearly 1% of global energy-related greenhouse gas (GHG) emissions. With AI driving demand, emissions are projected to rise sharply—AI data centers could emit 24–44 million metric tons of CO_2 annually by 2030, equivalent to adding 5–10 million cars to U.S. roads. Water Consumption: Cooling systems are the largest water users, with average Google data centers using 450,000 gallons per day. Some facilities, like Meta's global operations, use 1.4 billion gallons annually, drawing from local sources. In drought-prone areas like Arizona and Utah, this strain is exacerbating water scarcity. A single data center can consume as much water as a town of 50,000 people. Air Pollution & Health Risks: Backup diesel generators emit 200–600 times more nitrous oxides (NOx) than natural gas plants. These pollutants contribute to respiratory illness, asthma, and premature death, especially in vulnerable communities. In Bessemer, Alabama, where data centers are built in predominantly Black rural areas, residents face heightened health risks due to environmental injustice. Electronic Waste & Land Use: Data centers generate high volumes of e-waste, with only 16% of global e-waste recycled. They also require vast land—2,100 acres for one proposed Virginia project—leading to habitat destruction and biodiversity loss. Climate-Driven Costs: By 2055, climate-related disruptions (heat, drought) could cost data centers $3.3 trillion in cumulative losses, with extreme heat accounting for over two-thirds of the impact. Data centers significantly impact wildlife through habitat destruction, water use, pollution, and noise. Clearcutting forests and developing land for data centers destroys critical habitats, directly threatening species and fragmenting ecosystems. For example, a proposed data center in Alabama could destroy the unique habitat of the newly identified Birmingham darter fish, a species already at risk due to human development. Water use is another major concern. Data centers, especially those using evaporative cooling, withdraw large volumes of water, which can lower streamflows, warm water temperatures, and degrade aquatic ecosystems. This affects cold-water species like trout and endangered fish, as seen in threats to the spring pygmy sunfish in Alabama. Noise pollution from data centers disrupts wildlife behavior. Constant mechanical noise from servers, cooling systems, and backup generators can interfere with animal communication, alter migration patterns, and cause stress. This is particularly harmful to species sensitive to sound, such as birds and mammals. Transmission infrastructure built to support data centers also harms wildlife by fragmenting habitats, blocking migration routes, and disturbing species like the greater sage grouse. Health Risks to Workers Workers in data centers face multiple occupational hazards: Heat stress from high equipment heat output (up to 300 MW in large campuses). Poor air quality due to dust, debris, and chemical off-gassing during construction. Electromagnetic field (EMF) exposure from servers and electrical systems. Ergonomic injuries from heavy lifting and repetitive tasks. Noise pollution exceeding 80 dB from machinery, risking hearing damage. Arc flash hazards capable of causing fatal burns. Chemical exposure from fire suppression systems (e.g., halon) and cleaning agents. Physical dangers like tripping, falling, or being struck by debris during construction. Public Health Impacts on Nearby Communities Data centers contribute to environmental health threats:

		Air pollution from fossil-fuel-powered electricity and diesel backup generators releases nitrogen oxides (NOx), fine particulate matter (PM2.5), and volatile organic compounds. A 2025 model projects 600,000 asthma cases and 1,300 premature deaths annually in the U.S. by 2030 due to data center emissions. Noise pollution exceeding 90 dB can disrupt sleep and cause stress. Light pollution interferes with circadian rhythms, affecting sleep and hormone regulation. Water waste: Large data centers consume up to 5 million gallons of water daily, threatening water security in drought-prone regions. Environmental injustice: Data centers are often sited in low-income and minority communities, exacerbating existing health disparities Data centres in the UK cause significant environmental damage through massive electricity and water consumption, with typical AI-focused facilities using as much energy as 100,000 households and small centres requiring nearly 26 million litres of water annually for cooling. Carbon emissions are a major concern, as new data centres could generate up to 2.7 million tonnes of CO2 if the ten largest proposals proceed, potentially equivalent to the emissions of Denmark or 11.4 million homes if reliant on gas power. Construction often threatens green spaces and the Green Belt, with major projects like the proposed North Ockendon site (99 acres) replacing countryside that provides wildlife refuges and flood protection. Local communities face air and water pollution from diesel backup generators and cooling fluids, alongside e-waste from server components replaced every three to eight years, which is frequently exported to countries with weaker environmental regulations. Recent government and parliamentary inquiries highlight that data centres are omitted from the Seventh Carbon Budget despite electricity demand expected to quadruple by 2030, leading to grid instability and competition for renewable energy. Campaigners argue that 50% of stored data is never accessed ("dark data"), yet it still drives unnecessary resource use, prompting calls for stricter planning controls and mandatory environmental impact assessments for new developments. Why are councils signing NDAs when it comes to these type of deals? Where is the full disclosure and transparency that the local public deserve, and an enforceable contract demands?
109	Individual	Why would local planning allow this, if they are doing right by the locals and the local environment, we do not consent to this. Data centres in the UK cause significant environmental damage through massive electricity and water consumption, with typical AI-focused facilities using as much energy as 100,000 households and small centres requiring nearly 26 million litres of water annually for cooling. Carbon emissions are a major concern, as new data centres could generate up to 2.7 million tonnes of CO2 if the ten largest proposals proceed, potentially equivalent to the emissions of Denmark or 11.4 million homes if reliant on gas power. Construction often threatens green spaces and the Green Belt, with major projects like the proposed North Ockendon site (99 acres) replacing countryside that provides wildlife refuges and flood protection. Local communities face air and water pollution from diesel backup generators and cooling fluids, alongside e-waste from server components replaced every three to eight years, which is frequently exported to countries with weaker environmental regulations. Recent government and parliamentary inquiries highlight that data centres are omitted from the Seventh Carbon Budget despite electricity demand expected to quadruple by 2030, leading to grid instability and competition for renewable energy. Campaigners argue that 50% of stored data is never accessed ("dark data"), yet it still drives unnecessary resource use, prompting calls for stricter planning controls and mandatory environmental impact assessments for new developments.
110	[redacted]	I feel like this is an opportunity which the borough cannot afford to miss out on. We are constantly told the borough has no money so this is a project which we need. The prospect of how the borough will be viewed from big business owners will be key in helping bring the local area back to life with both jobs and opportunities.
111	Individual	Not against this centre being build aslong as it brings money into Havering and the area thrives back to how it used to be, clean, booming high streets, and more social settings
112	Individual	The proposed data centre build in Havering is a major positive for the region—driving investment, supporting skilled jobs and strengthening the UK's digital infrastructure. With projects of this scale, having the right management systems, compliance frameworks and operational controls in place from day one is key to successful delivery and long-term performance. If anyone involved in the project would like to discuss how this can be supported, feel free to reach out.
113	[redacted]	While I recognise the concerns around the impact a data centre development may have on the countryside, local people and environment, I believe this proposal also presents a significant opportunity for Havering and surrounding boroughs. As a small local business, [redacted] understands both the challenges and the importance of sustainable growth within our community. Our area is in real need of long-term investment, and developments of this scale have the potential to bring meaningful economic benefits, including job creation, skills development and future career pathways—particularly for younger generations. As digital infrastructure continues to grow, data centres are becoming an essential part of modern life, and it is important that communities like ours are not left behind but are instead able to benefit from that growth. This development should be viewed as an opportunity to deliver not only economic value but also strong social value. From a small business perspective, I would encourage a clear commitment to local employment, support for local supply chains, training opportunities, and partnerships with schools, colleges and community organisations to ensure that local people directly benefit. At the same time, it is essential that environmental impacts are carefully considered and mitigated. This includes protecting green spaces, investing in biodiversity, and ensuring that any development is accompanied by meaningful environmental regeneration. With the right approach, there is an opportunity to balance development with sustainability and leave a positive long-term legacy for the area. Overall, I support the principle of this development, provided that it delivers tangible benefits for the local community and takes a responsible, forward-thinking approach to environmental stewardship.
114	Individual	I/We the local residents of Havering do not consent to this offer of a data centre. Legal Rebuttal to Data Centers Environmental Impact Resource Depletion: Data centers can significantly strain local resources, particularly water. They require substantial amounts of water for cooling, which can lead to shortages for nearby residents.

		Energy Consumption: The operation of data centers is energy-intensive, contributing to higher electricity rates in surrounding areas. This can create financial burdens for local communities. Regulatory Compliance Stricter Regulations Needed: There is a growing call for more stringent regulations governing data center operations. Legal arguments can emphasize the necessity for compliance with local laws to safeguard community resources and rights. Local Moratoriums: Many towns and cities have enacted moratoriums or restrictions on data center development due to public opposition. This reflects a legal acknowledgment of the potential negative impacts on local communities. Community Rights Public Health Concerns: The presence of data centers can lead to increased pollution and health risks for nearby residents. Legal challenges can focus on the need to protect public health and the environment. Full Disclosure,Transparency and Accountability: Advocating for clearer communication from data center operators about their environmental and social impacts can strengthen legal arguments against their development. Data centers can negatively impact human health by emitting pollutants like nitrogen oxides and fine particulate matter, which are linked to respiratory diseases, cardiovascular conditions, and increased cancer risks. For livestock and animals, noise and light pollution from data centers can disrupt natural rhythms, migration patterns, and habitat development, potentially affecting reproduction and overall well-being.
115	Individual	This is just destruction of our greenbelt, i totally oppose the building of this data centre, they are already talking about adding houses and industrial estates to the area, with a massive increase in traffic to the area
116	Individual	I object to a Data Centre in Havering. This will damage the Eco system, destroy natural habitats, destroy green space. It will polute water ways and water tables, not to mention the huge energy usage. This is not good for Havering. We do need more money as a borough, but this should come from Government in the form of proper funding, not at the expense of residents and wild life by this proposed Data Centre. A big NO from me.
117	Individual	Totally support the proposal. The investment will be great for the area. The land being used is not in any sense an area of AONB. Its proximity to the M25 and LTC makes it the right place for such a development. Please don't allow this to get bogged down for years and years in legal arguments about the alleged presence of some rare newt or toad. Just get this proposal approved and start building.
118	Individual	I am completely against this development and would be disgusted with the council in allowing it.
119	Individual	The proposal for this exceptionally large data centre to be built on green belt land is entirely inappropriate. The impact to local residents and wildlife have no possible way of being mitigated. The environmental impact on the large amounts of water required for the data centre is incomprehensible and will cause significant damage for years to come. Further, the local area, particularly local wildlife centres and country parks are already set to be damaged and severely impacted by the building of the Lower Thames Crossing. It is incomprehensible that the government is even considering these two major proposals int he same area and in the same length of time. Both projects on their own have little benefit in comparison to the damage to local residents and importantly the local environment and wildlife. Further, the building of both of these projects will have unimaginable consequences to local traffic and infrastructure for several years. Green belt was made to be protected and the data centre completely flies in the face of any attempts to save and preserve out green spaces.
120	Individual	I am against the plans for the LBH data centre on the following grounds: Loss of arable farmland; Data centres are automated and require very few staff so references of additional jobs for local people is incorrect and misleading; Major disruption to local residents during construction; The roads serving the area were not made for the number of heavy vehicles that will be using them during construction; Our grid system was not designed to supply the huge amount of power needed for the data centre; Our reservoirs are likely inadequate to support this, together with all the new housing and flat building that is being proposed; A huge blot on the landscape; Loss of habitats for wildlife; Harmful pollution and noise caused by any back up generators impacting air quality and public health if local residents; Constant noise pollution from the cooling systems will cause annoyance and reduced quality of life for neighbours. I could go on.
121	Individual	Fully support the new data centre
122	Individual	Clearly the development will take many years.What will the access be Clay Tye Road ,Ockendon Rd and Fen Lane already suffer from excess traffic - especially when there are problems on the M25 Motorway. Will any Section 106 cash etc be allocated for local schemes. With the possibility of the Lower Thames Crossing also being built what " conditions will be put in place " to reduce harm to the residents in North Ockendon? Will there be further consultation on the possibility of this development ?
123	Individual	Fully support we need this for our children's future, financial support for Havering, employment and our enjoyment.
124	Individual	I think it's a great idea to have this amazing investment in Havering
125	Individual	I am writing to express my strong support for the proposed East Havering Data Centre Campus and the wider investment opportunity currently under consultation.

		This proposal represents a truly transformative, once-in-a-generation opportunity for Havering. As outlined in the recent article, the scale of potential investment—described as the largest in the borough's history—has the capacity to deliver meaningful, long-term benefits for residents, businesses, and future generations. One of the most compelling aspects of this project is its potential to create substantial new employment opportunities. At a time when many areas are striving to attract high-quality jobs, this development could significantly strengthen Havering's local economy, helping residents access skilled and sustainable careers closer to home. In turn, this reduces reliance on commuting and supports a more self-sufficient borough. In addition, the proposal offers a major boost to infrastructure and inward investment. By attracting national and international investors, Havering can position itself as a key hub for innovation and digital growth. This aligns with the borough's wider ambition to diversify its economic base and ensure long-term resilience in an increasingly competitive and technology-driven world. The regeneration of local town centres and surrounding areas is another important benefit. Strategic investment of this scale has the potential to revitalise communities, increase footfall for local businesses, and enhance the overall quality of the built environment. With careful planning, it can act as a catalyst for further improvements across the borough. Furthermore, projects like this can play a vital role in securing Havering's financial future. With limited public funding available, responsible private investment is essential to delivering the infrastructure, services, and opportunities that residents deserve. Of course, it is important that development is undertaken responsibly, with proper consideration given to environmental impacts, community engagement, and transparency. However, with the right safeguards in place, this proposal has the potential to deliver overwhelmingly positive outcomes. In conclusion, I believe this investment represents a significant step forward for Havering. It offers the chance to create jobs, attract investment, strengthen infrastructure, and secure long-term economic stability. I would strongly encourage continued engagement with residents and stakeholders to ensure the project delivers maximum benefit for the whole community.
126	Individual	I wish to object to the proposed data centre development on undeveloped Metropolitan Green Belt land. The site currently forms part of open countryside and contributes to the fundamental purposes of the Green Belt, including preventing urban sprawl, safeguarding the countryside from encroachment, and maintaining the openness of the area. The construction of a large-scale industrial data centre, along with associated infrastructure such as plant equipment, service yards, access roads, and security fencing, would clearly harm the openness and rural character of the site. National planning policy gives strong protection to Metropolitan Green Belt land and states that inappropriate development should not be approved except in very special circumstances. It is not evident that such circumstances have been demonstrated in this case. The proposal would introduce a substantial industrial-style development into a rural location, which would undermine the purpose of the Green Belt and set a concerning precedent for future development on currently undeveloped land. In addition, data centres can generate noise from cooling systems and backup generators and require significant energy infrastructure. These impacts are likely to conflict with the quiet rural character of the area. Given the strong policy protection for undeveloped Green Belt land and the harmful impact this proposal would have on openness and countryside character, planning permission should be refused.
127	Individual	WE DO NOT NEED ANOTHER VENTURE IN RAINHAM/HORNCHURCH THAT ERRODES OUR GREEN BELT, ENVIRONMENT AND AIR QUALITY FOR THE MONETARY BENEFIT OF THE COUNCIL. OVER THE YEARS, THE COUNCIL HAS ALLOWED SEVERAL NASTY VENTURES IN RAINHAM. CONTAMINATED SITE ARNOLDS FIELD FIRES, LANDFILL, GRAVEL SITES AND VEOLIA POLLUTING OUR AIR. THE AREA STINKS! HAVE A CONSCIENCE, RESIDENTS HEALTH AND WELL-BEING IS PARAMOUNT. We do not need a Data Centre in this vicinity. What we do need is a beautiful woodland area where children can learn about the habitat, and families can access a safe pocket of green belt where we can all benefit from. We currently have hundreds of lorries extracting gravel and causing severe damage to the roads the lanes with gravel spillages and more pot holes. Veolia produces atrocious stench, making residents sick. The council allow these to continue to ensure they make money, with no thought to residents health and well-being. The Council is duty-bound to provide its residents with an environmentally safe place to live, but we are exposed to Carcinogens, Toxins and Smoke from Arnold's Field. The Council has been aware of this for many years, but ignored it and now residents are experiencing severe ill health. In time, I look forward to a law suit that brings justice and peace to the residents. The Council don't care about this locality as the Councillors live for away and serve constituents in the north of the borough Upminster, Hornchurch, Gidea Park. They know they will be quickly eradicated from their political posts should they try this in their clean, tidy and unspoilt areas.
128	Individual	Very concerned over the green space that would be lost, the demands on essential services such as water and power, the effects on wildlife and the overall change to the area as a whole. Our home area is being overwhelmed with development that is changing the nature of our environment. Change must happen and jobs are much needed in the area but, there are other, existing and non-operational industrial areas within the borough that surely could be examined for re-use? There would be existing infrastructure enabling access. Roads and so forth. Derelict buildings that could be repurposed and existing connections to the basic facilities. Please do not give up yet more of our countryside whilst the industrial debris of former projects continues to scar the area and every other small space is crammed with shoebox, towering flats rather than decent sized houses with gardens. The area is becoming a concrete wasteland and the nature of area is being shaped accordingly. So many sad, angry and disconnected people. No community feeling. No respect or pride in the area.
129	Individual	With this data centre causing massive destruction to the countryside, its main purpose seems to be the increased use of AI, how many jobs will be lost in the area ?
130	Individual	I oppose the building of a data centre on green belt land because it diminishes the open spaces we hold here in Havering as our heritage. The placing of an ecology park next to an industrial site is nonsensical and it is also not accessible by public transport. There would be other places within the borough's parks which could provide some ecological benefits, say for instance the provision of orchards or even vineyards with a view to the effects of climate change. The visiting of the ecology park next to the data centre would also expose visitors to noise and fumes, hardly an enhancing experience of nature.

131	Individual	I strongly object to planning permission being granted for this data center. There are so many reasons why this site is the wrong place for it. It is not only green belt, but a rare wetland. We do not have the infrastructure in place to support the building of it. We were told that this was the only place that had a substation big enough to cope with it - now I see the substation is applying to make itself bigger. It is going to consume so much water it is unbelievable. It will be obsolete before it is built. The number of jobs once it has opened has been inflated. A new "farm" has just been added to the details which certainly won't need many staff. It will make constant noise & will be both a fire risk & a site for terrorists to aim for. There are plenty of brownfield sites that are in better areas around Lakeside & the Thames that have already been developed & could easily be repurposed. Added to the fact that we only have 28 days to read the mountain of paperwork I do not feel that the residents of Havering are being given the full picture around this issue. The developers have no experience of building this type of business. We are going to be hemmed in with the new Lower Thames Crossing so where are the 'green lungs' that people need to reduce the pollution? The traffic levels predicted are also extra traffic for local residents to cope with on country lanes not built to withstand constant HGV traffic. There is not much public transport to the site for the many visitors that are claimed will want to come & visit the park that will come with it. Overall this is a terrible idea in completely the wrong place.
132	[redacted]	[redacted] This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project has the potential to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. Given the scale of investment, we expect the data centre to act as a significant catalyst for broader business opportunities from supply chain contracts to partnerships in skills development and digital capability-building. Its presence should foster a stronger ecosystem of innovation, attract further investment, and enhance the borough's competitiveness on a regional and national level. It should catalyse knowledge, capability and investment in green and blue infrastructure, biodiversity initiatives and climate resilience across the Borough, offering both skills development and employment opportunities in environmental and climate sectors. This potential, however, must be harnessed through strong oversight and management by the Council, with appropriate key performance indicators and monitoring so that sustainable impact can be achieved. This will require the implementation of mechanisms to drive partnerships with stakeholders such as the BID and other major investments taking place locally, for example via the Thames Freeport, SEGRO and Beam Park Station and housing development. Anything short of a collaborative approach will only serve to further disengage communities, and so meaningful partnership working must not only be a central pillar of the approval of this application, but also properly funded and managed. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy.
133	Individual	I object to the proposed Local Development Order on the following grounds: The surrounding road network, particularly Fen Lane and Ockendon Road, is unsuitable for the scale of traffic proposed. Fen Lane is a narrow rural road with no pavements, lighting, or adequate passing places, yet it is expected to accommodate significant HGV and LGV movements. This raises clear safety concerns and appears to conflict with the National Planning Policy Framework (NPPF), which requires safe and suitable access for all users and seeks to prevent severe transport impacts. The development would result in substantial harm to the Green Belt. The Council acknowledges the site makes a strong contribution to Green Belt purposes, and under the NPPF, such harm must be given substantial weight. The case for "Very Special Circumstances" does not clearly outweigh this harm, particularly given the permanent loss of open countryside and agricultural land. The assessment of alternative sites appears overly constrained and may fall short of NPPF expectations to demonstrate that no reasonable alternatives exist before releasing Green Belt land. Residents would face prolonged disruption over a construction period of up to 20 years, including noise, dust, lighting, and traffic. This raises concerns under the NPPF, which seeks to secure a good standard of amenity, and may also engage protections under the Environmental Protection Act 1990 in relation to statutory nuisance. The site is not a sustainable location, with limited public transport and a reliance on private vehicles. This conflicts with the NPPF, the London Plan, and Havering's Local Plan, all of which promote sustainable transport and reduced car dependency. The proposal would also result in ecological harm, with habitat loss occurring well before mitigation becomes effective. This raises concerns under the Environment Act 2021 and biodiversity net gain requirements, which are intended to ensure measurable improvements to biodiversity. The scale and design of the development including large buildings, external plant, lighting, and security infrastructure would introduce a highly industrial character that is oposing the rural setting. This conflicts with NPPF policies requiring development to be sympathetic to local character and to limit impacts such as noise and light pollution. Finally, the use of a 20-year Local Development Order would significantly reduce ongoing public scrutiny, contrary to the principles of transparency and community engagement underpinning the Town and Country Planning Act 1990 and national planning guidance. For the reasons stated above, the proposal conflicts with key provisions of the NPPF, the London Plan, the Environment Act 2021, the Environmental Protection Act 1990, and the Town and Country Planning Act 1990. I respectfully request that the Council refuse the Local Development Order.
134	Individual	I strongly oppose the development of the datacentre at North Ockendon. It is not an appropriate place for a development of this size .This is a country area of Havering, with farms, fields for arable crops and a village centred around the old church . The area is Green Belt land- this needs protecting; if this development goes through, it will set a precedent and the Green Belt around London will disappear. [redacted] the proposed Thames Crossing road development linking the A127 to a Thames Crossing is already taking land from this area and is likely to cause major traffic problems while that is being built, add on the Data Centre development and we will suffer years of chaos on the nearby lanes and roads ! There must be an alternative Brown field site which doesn't take valuable farm land (which the country desperately needs). and ruin the natural environment . Please reject this development .
135	Thames Freeport	Thames Freeport supports the East Havering Data Centre proposal as a major investment opportunity for the borough. This is one of the largest private investments Havering has attracted and it has the potential to strengthen the local economy, create jobs, and build long term resilience locally, regionally and

		nationally. It also supports the shift toward digital infrastructure that underpins modern industry, public services, and AI. The proposal aligns with Thames Freeport's focus on high value sectors, future industries, innovation and AI, delplyoment of technology and skills. Data centres sit alongside our work on innovation, clean energy, and advanced manufacturing, helping position the area for sustained growth. Our focus is on linking investment to local outcomes, creating economic growth, development and opportunity. This includes skills and training pathways, and longer-term opportunities for local businesses to be part of wider supply-chain opportunities. Developments like this need to deliver benefits for residents as well as economic growth, through a focus on skills, innovation and community benefits/ Thames Freeport will continue to work with Havering and partners to ensure this investment supports local people and contributes to long term, inclusive growth across the region.
136	CPRE London	Dear Sir/Madam, Re: LDO0001.26 Formal consultation on the East Havering Datacentre Local Development Order CPRE London is a membership-based charity with almost 1000 members across London, concerned with the preservation and enhancement of London's vital green spaces, as well as the improvement of London's environment for the health and wellbeing of all Londoners. We are writing to object to the above Local Development Order on the following basis: • This is inappropriate development on the Green Belt. Exceptional circumstances cannot be said to exist. • The development will spoil the rural character and severely reduce the openness of this tranquil section of the Green Belt, which is still used for agricultural purposes. • The consultation timeframe has been unreasonably short for such a complex proposal. • The proposed development area is low-lying and could be at risk of flooding. • We are also very concerned about the adverse ecological impact of the development. There is a designated Site of Importance for Nature Conservation (SINC) on the proposed development site and several more SINCs nearby. There is extensive wildlife in the area including badgers, foxes, and numerous species of bird whose habitat may be destroyed or disturbed. Many thanks for considering these comments.
137	Individual	As a Havering resident, I strongly support the East Havering Data Centre proposal as a once-in-a-generation investment that can bring long-term economic and social benefits to our borough. The scale of investment and the creation of hundreds of skilled jobs—both during construction and in ongoing operations—will provide real opportunities for local people, particularly younger residents seeking careers in technology and engineering. It will also help position Havering as an important hub in the UK's growing digital economy, attracting further businesses and strengthening the local economy for years to come Just as importantly, I welcome the significant environmental and community benefits built into the scheme. The inclusion of a large Ecology Park, new public green spaces, and commitments to biodiversity and net-zero operation show that development and environmental responsibility can go hand in hand. The plans to provide public access, walking and cycling routes, and educational facilities will enhance quality of life for residents while making better use of the land. Overall, this proposal strikes a thoughtful balance between growth, sustainability, and community benefit, and I encourage the council to support it.
138	Individual	I object to this proposal for a number of reasons. 1. It's on green belt land, there is definitely alternative brown belt land that could cater for this. This has obviously been neglected to be considered. 2. Loss of wildlife. Again Havering should have to protect the various wildlife in its borough, building here certainly is not considerate on any level. 3. The promise of jobs will highly likely not help the local people as the centre requires a small number of people to run. I think it will benefit the outside large building contractors during the build. 4. The noise and disruption it will cause the local people who pay massive council tax bills already, to live in a borough that they likely moved to due to its green belt land, the impact it will have on the air and their quality of life is unreasonable. Havering have a duty of care that they seem to be neglecting. Kind regards
139	Individual	I object to the planned development as it is proposed to be built on Green Belt land. As I understand it, the Green Belt is there to protect green spaces around built up areas and prevent urban sprawl. Permitting this development will see the Green Belt in this location lost forever. I note that an 'ecology park' is proposed, but this will not compensate for the vast number and size of buildings which will be permanently erected on what is currently agricultural land. Furthermore, I object to the idea that a vast data centre is more worthy of Green Belt land than using it to grow food. Years of construction from a data centre will only add to the additional traffic, noise and dirt Upminster and the surrounding areas are going to have to endure with the proposed Lower Thames Crossing.
140	Individual	travel disruption, dirt, air quality, road damage is my main concerns.
141	Individual	We strongly opposed the Data Centre [redacted] We are currently surrounded by a beautiful landscape and have lots of wildlife, including foxes and badgers, [redacted] so this will cause a significant disruption [redacted]. The construction of it alone will be disruptive and on a huge scale where frankly our roads aren't accessible for it at the best of times, let alone all the havoc that comes with it. Once built it will be a total eye sore, use up huge resources, such as electricity and water and open the floodgates to more development. It's a huge NO DATA CENTRE from us.
142	Individual	Large-scale data centres, such as the proposed project can cause habitat loss and significantly impact local ecosystems, particularly if built on green space. Residents nearby data centres experience poor air quality, noise pollution from cooling systems, and loss of green space, leading to a reduced quality of life. Data centres face operational risks from climate change, such as flooding or reduced cooling efficiency during heatwaves.
143	Individual	Fen lane is not geared up to all those big trucks which are travelling to the green belt where the supposed to be data centre is going to be. Totally wrong!!!!
144	Individual	I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds:

		1. Unacceptable Environmental Impact and Noise Pollution The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid** Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
145	Individual	Please consider participating in the consultation for the Data Center they want to develop at our door step. IT IS TILL 07 APRIL ONLY! Link: https://www.havering.gov.uk/planning-3/east-havering-data-centre-consultation Here is my objection statement I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: **1. Unacceptable Environmental Impact and Noise Pollution** The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid** Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community

		Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
146	Individual	I reject this based on pollution, strain on our infrastructure. No benefit to local people.
147	Individual	I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: **1. Unacceptable Environmental Impact and Noise Pollution** The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid** Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
148	Individual	Fisrt of all i want to remind you why i voted for you ,in your manifesto you promised to protect the green belt ,a belt of green round London to stop the urban spall . Havering is town and country ,i choose to live in countryside, fresh air ,peace and quite ,and [redacted] .Digital Reef do not know enough about building datacentres to build on such a difficult area .my biggest worry is the water useage and if we have to pay extra towards their useage they should be on water meter,but they would be taking our water ,and i know centuries back we were given the rite to free water and gas and electricity and of course coal . But money grabbing people like DIGITAL REEF, AND HRA COUNCILLORS, have decided they can do what they like and [redacted] .i dont think an LDO is suitable for this kind of build as there are many dark areas in this planning ,where things can go very wrong ,also it seems like everywhere else gets something from this build apart from people that live here ,you are destroying the green belt and fenns ,wrecking our country lanes ,building 2 more substation ,and we got LTC ,BESS ,and a huge datacentres ,you say we have a ecological park but we all ready have that one we can walk around breathe the fresh air kids can see wildlife its i correct habitat. [redacted] a datacentres that gives of toxic fumes and a constant humming .the niose ,the dirt ,air pollution,

		the water and electric useage, i think if you give the planning it will definitely be about the money and nothing else ,LDO should have given us in at start but Helen Oakebee decided we were not to be told instead they tried to push it through withot us knowing very sneaky but i have learnt how sneaky and underhanded this council is ,its shameful ,the destruction of green belt and fenns ,wildlife, our metal health, to poison perfectly good farming land so it can never be used again ,we did not get one question answered at the consultations they were acomplete waste of time , this area is not the place for this industrial build take it near the water it requires ,build a brand new substation thats is fit for purpose i rally do object to this build years and years of dirt ,air pollution, roads destroyed,road closure ,unable to get out of village ,our beautiful historic village destoryed and what for and datacentre that will be obsolete before its finished ,i want 5 days a week working 8-5 and no weekend working if this thing does go through and i do not want any decease inmy water or electric supply or an increse in my bills ,but mostlyi DO NOT WANT A DATACENTRE .
149	Individual	I agree with the construction of the data center ! Go ahead we need jobs and development for this area
150	Individual	I am writing to agree with the construction of the data center, we need more jobs and development in our area
151	Individual	I am writing to formally submit my objection to the proposed Local Development Order for the East Havering Data Centre Campus in North Ockendon. As a resident, I believe this project represents an inappropriate and harmful development that fails to meet the legal requirements for construction on Green Belt land. My objections are based on the following material planning considerations: 1. Inappropriate Development on Green Belt Land I do not believe the applicant has demonstrated the "Very Special Circumstances" required by the National Planning Policy Framework (NPPF) to justify this scale of development on Green Belt land. • The permanent loss of openness in this area cannot be mitigated by an "ecology park." • There is no evidence that this facility must be located on this specific Green Belt site rather than on existing brownfield land within the wider region. The desire for proximity to a power grid should not override the fundamental protections afforded to the Green Belt. 2. Harm to Rural Character and Visual Amenity The proposed data halls are industrial in scale and entirely incongruous with the rural character of North Ockendon. • The height and massing of these "windowless warehouses" will dominate the landscape, destroying the current visual amenity of one of the few remaining rural pockets in the borough. • This project represents significant "urban sprawl," effectively merging the industrial edge of the M25 into our quiet countryside. 3. Impact on Residential Amenity (Noise and Light Pollution) The 24/7 nature of this facility poses a severe threat to the quality of life for nearby residents in North Ockendon and Cranham. • Noise: The constant low-frequency hum from high-capacity cooling fans is well-documented in other data center developments. I am concerned that the cumulative noise impact has not been sufficiently modeled for a quiet, rural environment. • Light: The security and operational lighting required for a site of this size will result in significant "sky glow," ending the dark-sky status of this area and disrupting local wildlife and residents alike. 4. Highway Safety and Traffic Congestion The local road network, specifically the B186 and Fen Lane, is entirely unsuitable for the volume of traffic this project will generate. • During the multi-year construction phase, the influx of Heavy Goods Vehicles (HGVs) will create safety hazards on narrow roads and lead to gridlock at the junction with the A127 and M25. • The "travel improvements" suggested to Upminster and Ockendon stations do nothing to alleviate the physical pressure of operational traffic on our residential roads. 5. Sustainability and Resource Strain I am deeply concerned about the environmental footprint of a facility of this magnitude. • Water Usage: Data centers require millions of liters of water for cooling. I see no guarantee that this will not impact local water pressure or place an undue burden on our already strained water utility infrastructure. • Energy: The carbon footprint of the backup diesel generators, which must be tested regularly, poses a risk to local air quality and contradicts the council's own climate goals. 6. Procedural Concerns Regarding the LDO Finally, I object to the use of a Local Development Order for a project of this complexity. The LDO process bypasses the granular scrutiny of individual planning applications, granting "blanket" permission that removes the community's ability to challenge specific building designs or environmental impacts in the future. Furthermore, the 28-day consultation period for a 3,000-page proposal is insufficient for meaningful public engagement. Conclusion For the reasons stated above, I urge the Planning Committee to reject this LDO. The economic promises of this project do not outweigh the irreversible destruction of Havering's Green Belt and the long-term detriment to the local community.
152	Individual	I am writing to object to the proposed Local Development Order for the East Havering Data Centre Campus (Digital Reef). This development would cause significant and lasting harm to Havering's Green Belt and surrounding communities, and does not meet the criteria required for exceptional approval. My main objections are as follows: • Inappropriate Development on Green Belt: The proposal does not demonstrate the "very special circumstances" required under national planning policy. The claimed economic benefits are speculative and cannot justify the loss of openness and character that Green Belt policy is designed to protect. • Impact on Rural Character and Landscape: The sheer industrial scale of the buildings would dominate the local landscape and be entirely at odds with the rural setting of North Ockendon. This would amount to clear urban sprawl and a permanent loss of countryside.

		• Noise and Light Pollution: A facility operating 24/7 with constant mechanical cooling and extensive security lighting would cause continuous disturbance to local residents and wildlife, destroying the natural quiet and dark skies that define this area. • Traffic and Road Safety: The existing local road network (B186, Fen Lane, and A127 junctions) is simply not designed for the volume of construction and HGV traffic this project would generate. This would lead to serious congestion, road damage, and safety risks for drivers, cyclists, and pedestrians. • Environmental and Resource Concerns: The project's energy and water demands for cooling, together with emissions from backup diesel generators, raise serious questions about its environmental sustainability and impact on air quality. • Lack of Proper Scrutiny: Using a Local Development Order removes the normal level of public and planning oversight. Each phase of such a development should be subject to its own detailed application and consultation so that residents can properly assess its evolving impact. For these reasons, I urge the Planning Committee to refuse this LDO and protect Havering's Green Belt from irreversible industrial development.
153	Individual	Fully supportive of the developement.
154	Individual	I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: **1. Unacceptable Environmental Impact and Noise Pollution** The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid** Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
155	Individual	Objection to East Havering Data Centre Campus LDO (Reference LDO0001.26) I am writing to submit my formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I would be directly affected by this development. While I recognise the broader need for digital infrastructure, I strongly object to this proposal on the basis that its scale, location, and proposed delivery through an LDO constitute inappropriate and harmful overdevelopment. My concerns are outlined below: 1. Environmental Impact and Noise Pollution The proposed site is unsuitable for a development of this scale and nature. Data centres operate continuously, requiring large-scale cooling systems and backup generators. This will result in persistent low-frequency noise alongside intermittent high-level disturbances, significantly diminishing residential amenity in Hornchurch and surrounding areas. Unlike typical commercial or industrial operations, this facility would run 24/7, offering no relief from noise pollution. This is likely to constitute a statutory nuisance, adversely affecting residents' quality of life and property values.

		2. Pressure on Infrastructure and Energy Resources Data centres are extremely energy-intensive. Local infrastructure in Havering already faces challenges relating to electricity capacity, water supply, and traffic congestion. This development would place substantial additional strain on the energy grid and local substations. Moreover, the routine use and testing of diesel backup generators raises serious concerns regarding air quality, particularly emissions of particulate matter (PM2.5) and nitrogen dioxide. This appears inconsistent with the council's stated climate and environmental commitments. 3. Impact on Local Character and Land Use Hornchurch is valued for its suburban character and proximity to green spaces. If the site includes or impacts Green Belt land, the proposal must meet the "very special circumstances" test. It is not evident that a large-scale commercial data centre campus satisfies this requirement. This is a private commercial development and should be located within established industrial areas or brownfield sites, rather than on land adjoining residential communities. 4. Use of Local Development Order (LDO) The use of an LDO for this proposal is a matter of significant concern. This approach bypasses the full scrutiny of the standard planning process, including opportunities to secure mitigation through Section 106 agreements and Community Infrastructure Levy (CIL) contributions. As a result, there is a risk that the development proceeds without adequate safeguards or meaningful benefits for local residents, despite placing additional pressure on local services and infrastructure. 5. Health and Visual Impact The scale and design of the proposed buildings, combined with continuous lighting and industrial appearance, would have a detrimental visual impact on the area. More importantly, the cumulative effects of noise, air pollution, and light pollution present a potential risk to both the physical and mental wellbeing of nearby residents. Conclusion For the reasons outlined above, I strongly urge the council to reject this LDO in its current form. The proposal represents disproportionate and inappropriate development that fails to adequately protect the interests of existing residents. Should the council wish to pursue this project, it must be subject to a full and transparent planning application process, ensuring proper scrutiny, mitigation measures, and accountability. I request that this objection be formally recorded and taken into consideration as part of the consultation process. If you want, I can also: Make it more legally technical (stronger for planning officers) Shorten it to a quick submission version Or tailor it to sound more personal/emotive for greater impact can you also include, I have serious concerns regarding the water resources that will be required as both Thames and Essex and Suffolk Water have additional data centre proposed within their areas and I find it hard to believe they will be able to meet the demand for water. Here's your revised objection with the additional water resources concern integrated clearly and in a formal tone: Objection to East Havering Data Centre Campus LDO (Reference LDO0001.26) I am writing to submit my formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Hornchurch, I would be directly affected by this development. While I recognise the broader need for digital infrastructure, I strongly object to this proposal on the basis that its scale, location, and proposed delivery through an LDO constitute inappropriate and harmful overdevelopment. My concerns are outlined below: 1. Environmental Impact and Noise Pollution The proposed site is unsuitable for a development of this scale and nature. Data centres operate continuously, requiring large-scale cooling systems and backup generators. This will result in persistent low-frequency noise alongside intermittent high-level disturbances, significantly diminishing residential amenity in Hornchurch and surrounding areas. Unlike typical commercial or industrial operations, this facility would run 24/7, offering no relief from noise pollution. This is likely to constitute a statutory nuisance, adversely affecting residents' quality of life and property values. 2. Pressure on Infrastructure, Energy, and Water Resources Data centres are extremely resource-intensive. Local infrastructure in Havering already faces challenges relating to electricity capacity, water supply, and traffic congestion. This development would place substantial additional strain on the energy grid and local substations. In addition, I have serious concerns regarding water resource availability. Data centres require significant volumes of water for cooling. Both Thames Water and Essex & Suffolk Water are already facing increasing demand, with additional data centre developments proposed within their service areas. In this context, it is difficult to see how existing and planned infrastructure will be able to meet cumulative demand without negatively impacting residential supply or the wider environment. Furthermore, the routine use and testing of diesel backup generators raises serious concerns regarding air quality, particularly emissions of particulate matter (PM2.5) and nitrogen dioxide. This appears inconsistent with the council's stated climate and environmental commitments. 3. Impact on Local Character and Land Use Hornchurch is valued for its suburban character and proximity to green spaces. If the site includes or impacts Green Belt land, the proposal must meet the "very special circumstances" test. It is not evident that a large-scale commercial data centre campus satisfies this requirement. This is a private commercial development and should be located within established industrial areas or brownfield sites, rather than on land adjoining residential communities. 4. Use of Local Development Order (LDO)

		The use of an LDO for this proposal is a matter of significant concern. This approach bypasses the full scrutiny of the standard planning process, including opportunities to secure mitigation through Section 106 agreements and Community Infrastructure Levy (CIL) contributions. As a result, there is a risk that the development proceeds without adequate safeguards or meaningful benefits for local residents, despite placing additional pressure on local services and infrastructure. 5. Health and Visual Impact The scale and design of the proposed buildings, combined with continuous lighting and industrial appearance, would have a detrimental visual impact on the area. More importantly, the cumulative effects of noise, air pollution, light pollution, and resource strain present a potential risk to both the physical and mental wellbeing of nearby residents. Conclusion For the reasons outlined above, I strongly urge the council to reject this LDO in its current form. The proposal represents disproportionate and inappropriate development that fails to adequately protect the interests of existing residents. Should the council wish to pursue this project, it must be subject to a full and transparent planning application process, ensuring proper scrutiny, mitigation measures, and accountability. I request that this objection be formally recorded and taken into consideration as part of the consultation process.
156	Individual	Here is my objection statement I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: **1. Unacceptable Environmental Impact and Noise Pollution** The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid** Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Upminster and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
157	Individual	Residents near data centers, especially those with large cooling systems or backup generators, report significant health impacts from constant low-frequency noise. In Granbury, Texas, neighbors of a bitcoin mining facility experienced severe migraines, vertigo, nausea, panic attacks, and permanent hearing loss due to noise levels reaching 90–100+ decibels—equivalent to a rock concert. The persistent "dull, inescapable hum" rattles windows and disrupts sleep, with some residents feeling vibrations in their walls. Air Pollution and Emissions Data centers powered by natural gas or diesel generators emit particulate matter (PM), nitrogen oxides (NOx), sulfur dioxide (SO_2), and carbon dioxide (CO_2). These pollutants are linked to respiratory and cardiovascular diseases, particularly in vulnerable populations. Communities near such facilities face increased health risks, especially when located in already overburdened areas.

		Water and Energy Strain Large data centers consume 1 to 5 million gallons of water per day for cooling, risking local water shortages. In Georgia, Meta's data center construction led to nearby residents' wells running dry. Additionally, the high energy demand can drive up local electricity bills, especially in areas with aging infrastructure, and may lead to unfair utility rate agreements that burden everyday residents. Long-Term Health and Environmental Risks While some sources claim data centers are safe if compliant with regulations, real-world cases show chronic health issues—including sleep disturbances, elevated stress, and reduced quality of life—due to 24/7 noise and vibration. There are also concerns about "bad harmonics" from power systems, which can damage household electronics and increase fire risks. Despite modern design solutions like underground equipment and acoustic barriers, cost remains a barrier to widespread implementation. Ethical and Location Concerns Data centers are increasingly sited in low-income and minority communities, exacerbating existing environmental injustices. These locations are often chosen as "sacrifice zones," where public health is sacrificed for private technological gain, despite the disproportionate health risks faced by residents. The LDO goes against DEFRA's Clean Air Strategy 2019. Buying carbon credits won't offset this.
158	Individual	This application should be refused. It wont be, because its already been decided by the 'Gods'. No amount of community efforts or protest against this application will be fruitful. I know this through insight and understand this forum is a tick box exercise in the process.
159	Individual	I am writing to register my strong objection to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. The scale, location, and method of delivery of this specific project will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following grounds: 1. Environmental Impact and Noise Pollution- Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Upminster and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. 2. Strain on Infrastructure and Energy Grid- Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Upminster, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful toxins into our air, directly contravening the council's climate emergency commitments. Huge Lorrie's in the area will also cause major disruption, noise and pollution, no doubt creating more damage to road surfaces which already need repair. 3. Health and Visual Impact- The constant light pollution from security lighting and the physical size of these warehouse-like structures will create a visual impairment on the landscape. More importantly, the effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. 4. Wildlife- The effects of such building would be catastrophic to the vast amount of natural wildlife on this area of Green Belt: badgers, foxes, newts, toads & frogs, plus a huge number of various species of birds. The developer estimates up to ten years for construction and when the terrified wildlife is forced from its environment early on, it is extremely unlikely to ever return. The site in question is a very extensive open & green area, with growing crops, established hedgerows and ancient trees. I understand there is a SINC in place (Site of Interest for Nature Conservation) on the location, plus several other SINCs close by and it is right next to a conservation area. These SINCs will contain details of endangered species listed by Friends of the Earth. This site is simply inappropriate for a data centre development. There is an ecology park proposed as part of the site, however ecosystems can take hundreds of years to develop and build up, and simply cannot be replicated with a few weeks of planting. The claim of 100% net biodiversity gain is therefore nonsense. 6. Emissions- These data centres also produce huge amounts of CO2 thus contributing to global warming. Each new data centre will exacerbate the problem. 10 years of construction will create carbon emissions, plus the manufacturing of necessary materials used will have created 'embodied carbon'. Unless electricity is generated from wind or solar power, it is not 100% green, and as the UK does not have a green supply of electricity, it also creates carbon emissions. This data centre could use as much electricity as 50,000 homes! The claim of 'zero carbon' emissions is therefore nonsense. 7. Water- Excessive quantities of water are needed for cooling. No estimates have been provided as yet, as to the amount this data centre will require, but it can be around 5 million litres per day! That would supply tens of thousands of houses. It is not at all clear where this water would originate from, and where it would go after use as a coolant. There has recently been a claim that the cooling can be done chemically; which raises questions of pollution and safety issues. Not just here, but across the world, data centres are being blamed for causing water shortages. I urge the council to reject this proposal. This proposal prioritises external commercial interests over the health, wellbeing, and environmental quality of Havering's existing residents and the wildlife of the area. I request that my objection be formally recorded and considered as part of the consultation documentation.
160	Individual	I am writing to register my formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: 1. Unacceptable Environmental Impact and Noise Pollution The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by

		residents in Upminster and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. 2. Strain on Infrastructure and Energy Grid Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Upminster, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. 3. Character of the Area and Green Belt/Land Use Upminster and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. 4. Lack of Local Benefit and Use of LDO It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Upminster. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. 5. Health and Visual Impact The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. Conclusion I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
161	Individual	Having seen the publicity that this was supposed to be an environmentally sensitive propject, I am shocked to see that this huge multi-million pound development has no provision to extend walking and cycling facilities to the nearby rail links or cycle routes and so will simply generate more motor traffic on our already congested roads.
162	Individual	New research from the University of Cambridge reveals that the rapid expansion of AI data centers is creating "data heat islands" that significantly warm surrounding environments. The study indicates these facilities can increase local land surface temperatures by an average of 3.6 degrees Fahrenheit (2C), with some areas experiencing rises of up to 16.4 degrees Fahrenheit (9.1C), affecting more than 340 million people globally. Researchers analysed 20 years of NASA satellite data, mapping it against over 6,000 data centres to isolate the warming effect caused by physical heat released from server cooling and computation. Significant temperature increases were detected up to 6.2 miles from sites, with consistent warming trends observed in regions like Spain's Aragón, Mexico's Bajío, and Brazil's Ceará and Piauí. Experts warn of a lack of oversight as data centres are projected to become one of the most power-hungry sectors, with researchers suggesting solutions such as "carbon-aware" software and passive cooling technologies. Have you considered these effects on our local community? The very negative, if not danger to life? Reporting Gaps: Campaigners and MPs warn that defra and the government currently lack consistent data, as many developers fail to include future carbon emission estimates in planning applications, leading to figures that may be under-estimates. Regulatory Pressure: Charities including Global Action Plan and Foxglove have challenged the government to include data centres in carbon budgets and require proper environmental impact assessments, noting that current self-regulation is inadequate to meet UK decarbonisation targets. THIS IS NOT LOOKING OUT FOR, OR DOING RIGHT BY LOCAL CONSTITUENTS, breaching everything you are meant to stand for!
163	Individual	TRAVEL PLAN: There is only one oblique reference in the Travel Plan to the Lower Thames Crossing. Given these projects, at least in part, will run concurrently and impact the same North Ockendon community who, again at least in part, will be sandwiched between the two and subject to disruption from both, there should be a re-evaluation of the Travel Plan and/or an umbrella travel/environmental/social plan focussed not on the projects but on the community. If the 370 bus route is suspended for any length of time, elderly, disabled, and other non-driving residents will effectively be isolated/trapped. Previous disruption to the service required walking from South Ockendon across fields that will be occupied for the LTC project and, presumably, not accessible. GREEN BELT MITIGATION: North Ockendon's current residents who will bear all the load of disruption from this and the other projects being undertaken concurrently receive no consideration for the loss of amenity - e.g. closure of footpaths, restricted access to current green belt, pollution traffic-related and construction related with on-going pollution when the site is complete. Great for the projects listed, no doubt, but at what cost to North Ockendon? Where is the assessment please? At what stage of the project will the proposed upgrades be accessible to North Ockendon residents within the conservation area? It would be particularly helpful to see the impact assessment for the Church Lane part of North Ockendon including the potential impact on access the the Church. (It is hard to separate this project from the others, LTC, sub-stations, etc contextually). In 20 years because of the progress there will have undoubtedly been in the realm of Data management and processing, North Ockendon will be left with an enforced brown field site of

		significant value to the owners of the (potentially white elephant) data centre and, North Ockendon will be defenceless against the kind of development that is subsuming Bulphan and its environs. No green belt mitigation or requirement to reinstate the land to its present fenland environment could I find in this happenstance. SOCIO-ECONOMICS: I could find nothing relating to the impact on residents in the context of the probability of negative assessments that this project will make to the blight on potential property transactions. Again, this is impossible to separate from the already (April 2026) negative impact f the LTC and other proposed projects. Some residents are effectively trapped, or expected to take a significant loss on their properties. For some, whose property was their anticipated "pension", this will be represent a significant stress. The mental health of some residents caught in the pincer effect of the LTC and this project, is already a matter of concern. Where is the planning authority's consideration of these aspects please? Additionally, it is very difficult to maintain confidence in the Local Planning Authority's ability to "police" the project in its entirety when nothing has been done on a much smaller scale to force the closure of the Car Sales at White Post Farm, adjacent to this project, developed without planning consent, similar light industrial businesses on land behind Nurture Nursery at the end of Church Lane, North Ockendon established without apparent planning permission with no enforcement notice served to cease, subject to planning consent being sought. All these, to some extent already impact negatively on residents in the conservation area - who themselves are subject to stricter planning rules than it appears apply to these "rogue" businesses/developers. NOISE AND VIBRATION: Again this assessment should be considered cumulatively with the LTC and other projects. Noise levels from the current M25, for which I understand proposed mitigations were never put in place, already reach 90db under conditions affected by the prevailing winds for residents of the Church Lane part of North Ockendon. Again, it is difficult to have confidence in the proposals for noise mitigation when the planning authority has failed to secure them for other major infrastructure projects to date. What enforcement/penalty/compensation clauses/retention of powers by the planning authority are in place to protect residents please if noise/vibration and other pollutant levels exceed those forecast? Given that shift work is mentioned elsewhere (transport plan) is it anticipated that there will be round the clock working in the construction phase? Again, what mitigations are in place if that is the case? GENERAL COMMENT: It is particularly sad that the planning authority has no sense of legacy heritage so that its only rural community in Havering outside of the M25, where the agricultural land use has remained largely recognisable for centuries and which has roots and history preceding the Doomsday survey, is being sacrificed for the benefit of everyone else except us, its residents, for whom there appear to be no discernible compensations/advantages under any phase of the project. It proudly celebrates and promotes the Tithe Barn (which was probably never a Tithe Barn) the Upminster Windmill and so on, but will happily oversee the destruction of a community, North Ockendon for relatively minimal benefit.
164	Individual	We definitely do not want a data centre in Havering!! Ai is already bad for the planet and this will be no different using up vast amounts of water and electricity. We are supposed to be trying to save our planet not help to destroy it more. I also do not want my bills to go up more because of this awful place. It's not wanted!!!
165	[redacted]	It would be helpful for local and surrounding people.
166	Individual	Subject: Formal Objection to the Proposed Local Development Order (LDO) I am writing as a proud Havering constituent of Rush Green and Crowlands to formally object to the proposed Local Development Order for the East Havering Data Centre Campus. I believe this project represents an inappropriate and harmful development that fails to meet the legal requirements for construction on Green Belt land. My objections are based on the following material planning considerations: 1. Inappropriate Development on Green Belt: The applicant has failed to demonstrate the "Very Special Circumstances" required by the NPPF. The economic benefits do not outweigh the permanent loss of openness in this protected rural area. 2. Harm to Rural Character: The massive industrial scale of these warehouses is entirely incongruous with the rural character of North Ockendon and the surrounding borough. This represents significant "urban sprawl." 3. Noise and Light Pollution: The 24/7 operation of high-capacity cooling fans will create a constant low-frequency hum, disrupting the tranquillity of the area. Additionally, security lighting will destroy the "dark sky" status of this rural pocket. 4. Traffic and Infrastructure Strain: The local road network (B186, Fen Lane, and A127 junctions) is unsuitable for the volume of HGVs and operational traffic. This will lead to increased congestion and safety hazards for all residents. 5. Resource Consumption: I am concerned about the massive, undemocratic water requirements for cooling and the air quality impact from the regular testing of large-scale backup diesel generators. 6. Procedural Unfairness: The use of a Local Development Order (LDO) bypasses the necessary granular scrutiny of individual planning applications and removes the community's voice in future phases of the project. Lastly, Can the applicants confirm what governance framework will determine which clients and data uses are permitted, and specifically, will there be any exclusions or oversight mechanisms regarding military, weapons systems, or mass surveillance contracts? - What accountability will local residents and Havering Council have over how data processed here is used? Data centres of this scale are known to consume millions of litres of water annually for cooling, often drawing on drinking-quality supplies. Can you provide projected daily and annual water consumption figures, confirm the water source, and explain how this has been integrated into Havering's water management planning (particularly given the existing pressures on the Thames water system and the Green Belt designation of this site)? - And what ongoing transparency and community oversight of water use is proposed? As I understand it there is a move towards data centres recycling their water - will this be one of those - or will it draw from the London ring main and so put further pressure on abstraction levels

		that are already unsustainable? Will effluent water be discharged to treatment plants, or will it be cooled prior to entering any water course, thereby prejudicing wildlife habitats? Since the inception of the current data centre development boom, can the council confirm it has received advices from central government that net zero plans have been updated appropriately so that consents for data centres like this are actually legal? I urge the Planning Committee to reject this LDO and protect Havering's Green Belt.
167	Individual	I strongly object to the proposed building of a data centre on Green Belt land for the following reasons: Environmental and Resource Impacts • High Energy Consumption: the massive electricity demand will strain the local/national grid, potentially leading to grid capacity constraints, and conflict with net-zero targets and the transition to renewable energy. • Water Usage: Data centres require significant water for cooling, which can put pressure on local water supplies, especially in drought-prone areas. • Greenhouse Gas (GHG) Emissions: a negative contribution to climate change, including life-cycle GHG emissions and the environmental footprint of powering the facility. • Pollution and Hazards: o Air Pollution: Concerns over emissions from diesel-fuelled backup generators, which are used during power outages. o Noise Pollution: The constant 24-hour hum from cooling systems can cause disturbance to local residents. o Flooding and Drainage: Increased flood risk if the development reduces the ground's ability to absorb rainwater, especially in low-lying areas. o Harm to Wildlife and Biodiversity: Concerns about the potential destruction of natural habitats, disruption to protected species (such as bats or badgers), and loss of mature trees and hedgerows. • Loss of openness and character: the building will harm the open aspect and rural character of the area. • Waste and End-of-Life: Concerns about the future electronic waste generated when the facility reaches the end of its typical 10-15 year lifespan. Local Amenity and Character • Visual Impact and Design: The height, bulk, and massing of large, warehouse-style buildings will be out of character and overbearing to the local area. • Impact on the Green Belt: Development on Green Belt land is inappropriate. The development will harm the essential openness and permanence of the Green Belt. • Traffic and Highway Safety: Increased traffic generation from construction vehicles and operational staff, along with inadequate parking or access points will impact on road safety. Developments in isolated locations increase reliance on private cars, which conflicts with sustainable development principles and can worsen air pollution. • Impact on Heritage Assets: Potential adverse effects on conservation areas, such as Land of the Fanns or other heritage assets. Planning Policy and Process • Inadequate Justification: Has the developer sufficiently proven the need for the development in that specific location, especially if alternative, non-Green Belt sites are available? • Infrastructure Capacity: Concerns that the local infrastructure, beyond just power and water, cannot support the demands of the data centre (e.g. public drainage systems). Harm to Green Belt purposes: The proposal is seen to undermine the core functions of the Green Belt, which are to: • Check the unrestricted sprawl of large built-up areas. • Prevent neighbouring towns from merging. • Safeguard the countryside from encroachment. • Preserve the setting and special character of historic towns. Setting a precedent: Allowing one development will set a "dangerous precedent" for further, speculative building on protected land in the future.
168	Individual	I strongly oppose the proposed development of the LBH East Havering Data Campus for the following reasons: 1) Climate It contradicts the Mayor of London's Climate goals. The London Assembly have stated that Havering (& 3 other London councils) will be under the most pressure (of all boroughs) from the building of the hyperscale data centres in their boroughs. It would appear that this project is being rushed through ahead of the Mayor of London's new London Plan which will include a special section on data centres. 2) Energy & Cost to domestic consumers The additional demand for electricity. This data centre will use 600,000 kilowatts of electricity, with the resultant heat being dispersed into the local environment. Cambridge University have published a report that states that data centres increase local temperatures by on average 3.6 degrees Farenheit. In the USA it has been documented that the demand by data centres has led to infastructure upgrades with the resultant cost being passed on to domestic consumers. 3) Water Water stress - Havering is situated in one of the lowest areas of rainfall in the country. Essex & Suffolk Water (ESW) have said that in times of drought they will put residents ahead of the data centre. This is extremely unlikely. ESW have been responsible for the delays in the rebuild of Gallows Corner and the debacle that has ensued. 4) Noise I understand that the data centre will generate a 24 hour humming noise. How can the council this that this is acceptable for local residents, businesses and their amenity? 5) Green Belt I am horrified that Havering Council and particularly the Residents Association councillors have supported this development. The data centre will destroy a vast area of virgin GREEN, NOT GREY belt.

		The Residents Association councillors were elected on a mandate to SAVE our Green belt. In fact in their bulletin of October 2025 they state that they are " vigorously opposed to any threats to the Green Belt and will do all they can to protect it!! 6) Precedent I note that this is being called the "East" Havering data centre. Does this mean that the council would permit the further development of Green belt land to build another data centre in other parts of Havering? Havering Council are promoting the creation of "Village Greens" to provide "Lasting protections for green and open spaces valued by local residents". The residents also want Havering to retain its open fields and undeveloped countryside, not just tiny pieces of land that are too small for development in any event!! 7) Mitigation The payment being made to Havering Council by Digital Reef is (supposedly) going to be used to enhance other green spaces in the borough. Who is going to ensure that this money is not misappropriated? I recall when the Woodland Trust donated hundreds of trees to Havering Council , some were planted in Rise Park. These were not adequately watered and then allowed to die. I phoned the council to report that they were dying and was asked by the parks department if i could carry a watering can to the park and water them myself!! Hence I have no faith that these mitigation projects will be carried out properly and maintained in the future. 8) Consultation period Having attended the consultation meeting at Romford Town Hall it was confirmed that the consultation period could have been longer than 4 weeks but for some unknown reason this was not permitted. The 4 week period includes the Easter holiday. Residents are expected to read over 3,000 pages in 4 weeks! This is a disgrace. What is the rush, could it be due to the forthcoming local elections? At the very least if the the council cares for its residents' opinions at all it should wait for the new London plan to be published and then begin the consultation period. and finally... The logo of Havering Council logo is "the Havering you want to be part of" I have lived in Havering my whole life and up until now have been proud to do so. A Havering with the biggest data centre in Europe is not the Havering I want to be part of. What a shameful legacy this council will leave for posterity.
169	Individual	With regards to the East Havering Data Centre proposals I offer the following observations, in particular in relation to the proposed mitigations as set out in the Draft Heads of Terms (S106) document. It is acknowledged that the EHDC development would have a significant detrimental impact on the Green Belt land in the locality of North Ockendon. Whilst there is analysis within the documentation of the impact on residential properties in the locality, and in terms of various environmental factors, there does not appear to be any direct recognition of the impact on the local community, and whilst the S106 provides for environmental mitigations and necessary highway improvements primarily to facilitate the installation of the buildings and infrastructure, this does little to address the social and wellbeing effects on local residents. The Draft Heads of Terms for Section 106 Obligations contain a mixture of interventions, some close to or part of the campus and other elements delivered across the borough, primarily green space improvements. The ecology park, its access routes, road and footway improvements are presumably viewed as local mitigations albeit they also serve other users including access for the development. Given that the Highways works are directed and constrained to the construction routes I think there are adjoining routes, especially pedestrian footways such as St. Mary's Lane which should be included as part of the enhanced public access to the ecology park. Poor local connectivity and appalling footpath quality have been issues that I have raised in my capacity as Ward Councillor both with the maintenance services and via Schemes request, of particular relevance since a local bus route to Upminster was scrapped. There are two Upminster parks which have been excluded from the S106 listings and these will have relevance to the North Ockendon residents as these are the closest public park and sports ground to the locality, situated close to the Upminster Town Centre. There is nothing in relation to interconnectivity to other public green provisions such as Thames Chase, I think this is an oversight, though a refreshed Local Plan might be the place to draw together this aspect in the light of the LTC impact, potential responses to calls for development sites, and through 'Grey Belt' designation. Another challenge exists in relation to the distribution and use of any Community Infrastructure Levy arising from the development. The application of those funds are not specified in the document and are likely to be less tied to improving the locality.
170	Individual	Dear Sir/Madam, I am writing to formally lodge a strong objection to the proposed Local Development Order (LDO) and planning application for the data centre at North Ockendon. This proposal represents an unprecedented and inappropriate industrialization of the Green Belt that fails to meet the "Very Special Circumstances" required by the National Planning Policy Framework (NPPF). Our objections are based on the following material considerations: 1. Inappropriate Use of a Local Development Order (LDO) The use of an LDO for a project of this scale on Green Belt land is inherently flawed. As per Section 3.3 of the Guidance on Preparing LDOs, effective engagement is a "fundamental component." The Council’s refusal to provide information until the formal consultation stage has deprived residents of the time needed to digest a 490-hectare proposal. This lack of transparency contradicts the requirement for Local Planning Authorities (LPAs) to be clear from the outset about the "opportunity" or "issue" being addressed. 2. Failure to Protect the Green Belt The site encompasses 490 hectares of active agricultural land and sits within/adjacent to a Conservation Area.

		Openness: The NPPF emphasizes the "essential characteristics of Green Belts are their openness." A complex of 15 buildings reaching 21 metres in height, encased in 16-metre security fencing, is a total negation of openness. Urban Sprawl: This development creates a dangerous precedent, contributing to the "ribbon development" and urban sprawl alongside the Lower Thames Crossing and nearby battery storage sites. Lack of Very Special Circumstances (VSC): Digital infrastructure needs do not grant a "blanket" override of Green Belt protections. Financial gain (business rates) is not a material planning consideration and cannot be used to justify VSC. 3. Irreversible Ecological Damage The claim of 100% Biodiversity Net Gain (BNG) is scientifically questionable. Habitat Loss: The site contains and borders several Sites of Interest for Nature Conservation (SINCs). The 17–20 year construction phase will permanently displace red-list bird species, badgers, and amphibians. Inadequacy of Mitigation: "Whips" and "bunds" cannot replace mature hedgerows and established ecosystems that have developed over centuries. Furthermore, an "ecology park" in a location inaccessible by public transport creates a net negative environmental impact via increased car dependency. 4. Sustainability and Resource Intensity This development is in direct conflict with the climate emergency: Energy Demand: Data centres can consume as much electricity as 50,000 homes. There is no evidence the local grid can sustain this without compromising domestic supply. Water Stress: Cooling requirements (estimated at 5 million gallons per day) are unsustainable in a water-stressed region where residents already report supply issues. Carbon Footprint: The "Zero Carbon" claim ignores embodied carbon in construction materials and the emissions from 10 years of heavy machinery. 5. Impact on Residential Amenity The "well-being" of North Ockendon residents will be severely compromised: Acoustic Nuisance: Data centres produce a constant 24-hour low-frequency hum. Standard decibel testing often fails to account for the health impacts of such vibrations. Construction Impact: A decade of construction traffic on narrow rural roads will lead to significant dust, noise, and air pollution. Employment Misrepresentation: The claim of 2,800 jobs is misleading; the vast majority are temporary construction roles. The permanent operational staff (75-125) offers negligible economic benefit to the local village compared to the scale of the destruction. 6. Flood Risk and Public Safety The site is low-lying and contains rare "fen" country. Replacing 490 hectares of absorbent soil with "sealed" warehouse surfaces will significantly increase run-off and downstream flood risks. Furthermore, the inclusion of 50,000 square metres of battery storage poses a significant fire and toxic-leakage risk to the local water table. Conclusion The proposed data centre is the "wrong building in the wrong place." It prioritizes the financial interests of global corporations over the statutory protections of the Green Belt and the health of local ecosystems. We urge the Council to reject this LDO and protect the unique character of North Ockendon.
171	Individual	Re: Objection to Planning Application – Proposed Data Centre Development at Site Location/North Ockendon Dear Sir/Madam, I am writing to formally submit my objection to the proposed development of a data centre at the aforementioned site. While I recognize the importance of digital infrastructure, this specific location is entirely inappropriate for a project of this scale and nature. The proposal fails to meet the "very special circumstances" required to justify development on Green Belt land and would result in irreversible environmental and community harm. My objections are based on the following grounds: 1. Inappropriate Use of Green Belt and Lack of ‘Exceptional’ Justification The application site is an extensive, open green space characterized by active crops, established hedgerows, and ancient trees. It includes a Site of Interest for Nature Conservation (SINC) and sits immediately adjacent to a Conservation Area. We do not accept that a data centre constitutes an "exceptional" case sufficient to override the protection of this natural environment. Granting permission would set a dangerous precedent, inviting further industrialization of North Ockendon—the only part of London outside the M25—and contributing to the erosion of the Green Belt through urban sprawl. 2. Irreparable Harm to Biodiversity and Wildlife The area is a thriving habitat for badgers, foxes, frogs, newts, and between 60–70 species of birds. We are currently documenting "Red List" endangered species within the onsite and neighbouring SINCs. The developer’s estimate of a 17–20 year construction period ensures a decade of noise, light, and chemical pollution that will drive wildlife away. Once these delicate ecosystems are disrupted for such a duration, it is highly improbable that the species will ever return. 3. Flawed Mitigation and the ‘Ecology Park’ The proposed "ecology park" is an inadequate attempt at mitigation for the following reasons: Inaccessibility: The site is not served by public transport. Encouraging visitors to drive to a "park" in a remote area creates further carbon emissions and traffic, undermining the very concept of environmental protection. Functional Failure: The plan to "grass over" the perimeter of 21-metre-high industrial buildings does not constitute a park. It is unrealistic to suggest that the public will seek recreation in the shadow of massive industrial units. Ecological Misunderstanding: The use of "whips" for screening is a superficial solution. These will take decades to mature and cannot replace the complex, centuries-old ecosystems currently

		on-site. The developer's claim of 100% net biodiversity gain is, in our view, demonstrably unrealistic and ignores the reality of how habitats function. 4. Cumulative Impact and Urban Sprawl This development must be viewed in the context of the Lower Thames Crossing, proposed battery storage facilities, and new housing in West Horndon. Collectively, these projects represent a massive industrialization of the corridor. Furthermore, the site is downwind from the existing air pollution issues at Launders Lane; adding further industrial emissions and construction dust will exacerbate an already poor air quality situation for local residents. 5. Construction Impact and Infrastructure Strain A decade-long construction phase is an unacceptable burden on the North Ockendon community. Our local roads are narrow and already struggle with heavy vehicle traffic. The influx of hundreds of construction worker vehicles daily, combined with heavy plant machinery, will lead to constant congestion, dust, and fumes, severely impacting the quality of life and safety of residents. Conclusion For the reasons stated above, this proposal represents the "wrong building in the wrong place." It threatens the integrity of the Green Belt, the survival of protected species, and the well-being of the local community. I strongly urge the planning committee to refuse this application. I look forward to receiving acknowledgment of this letter and being kept informed of the progress of this application.
172	Historic England	HISTORIC ENGLAND ADVICE Thank you for your consultation received on 06 March 2026. We have reviewed the LDO planning documentation supplied with this public consultation and attended the consultation briefing on 18 March. The reviewed documentation includes the draft LDO, plans, design codes, and draft conditions which would be included on the LDO, a Statement of Reasons and an Environmental Statement (ES) and technical appendices containing an archaeological desk-based assessment, deposit model and a cultural heritage assessment. This advice letter covers both Historic England's statutory role in relation to designated heritage assets and the Greater London Archaeological Advisory Service's (GLAAS) on non-designated archaeology. Our advice follows the National Planning Policy Framework (NPPF). Summary of advice The proposed development site is likely to affect the setting of North Ockendon Conservation Area, listed buildings within it, several isolated Grade II listed farmhouses (including Bury Farmhouse) and, within Brentwood District Council, two scheduled monuments: the Old Thorndon Hall and Gardens (1021226) and the former parish church and churchyard of St Nicholas (1021225); as well as the Grade II* Thorndon Hall Registered Park & Garden; and the Grade II* All Saints Church at East Horndon. Where harm has been assessed to designated heritage assets, we agree that it would be less than substantial, but further information is requested in relation to designated assets in Brentwood District, including the degree to which they have been subject to assessment already. The site lies within an Archaeological Priority Area, contains known assets of archaeological interest and has high potential for new discoveries. The assessment of significance and impact for non-designated archaeology is not complete and requires further information in order to enable an informed decision. We recommend field evaluation to comply with the NPPF and Havering Local Plan Policy 28. At present the uncertainty is such that the proposed condition and related provisions within the draft Local Development Order (LDO) and supporting documentation might not be sufficient to appropriately safeguard archaeological interest. We would welcome the opportunity to meet with the local planning authority and design team to discuss further how best to address these recommendations to ensure the scheme is compliant with policy and guidance with regards to the historic environment. Assessment of Significance: Designated Heritage Assets The proposed development site does not contain any designated heritage assets but affects the setting of the North Ockendon Conservation Area, listed buildings within it and several isolated listed farmhouses. The LDO Statement of Reasons concludes that harm to the conservation area and the Grade II Bury Farmhouse is 'outweighed by the considerable public benefits arising from the proposed development'. We note the assessments and conclusions drawn on the effects of the proposed development on those designated heritage assets within 2km of the site, including Bury Farmhouse and the North Ockendon conservation area. We would however welcome some further detail as to the level to which assets beyond the 2km boundary have been considered as part of the ZTV assessment.

		These include a number within Brentwood District Council, including two scheduled monuments: the Old Thorndon Hall and Gardens (1021226) and the former parish church and churchyard of St Nicholas (1021225); as well as the Grade II* Thorndon Hall Registered Park & Garden; and the Grade II* All Saints Church at East Horndon. The location of these assets on an elevated ridge at the edge of the Brentwood Hills, a prominent vantage point from which to see and be seen, makes an important contribution to their significance. Their prominent siting, dominant over an extensive landscape, is a key reason of their location, which in the case of Old Thorndon Hall, involved the demolition of the parish church of St Nicholas, West Horndon that formerly stood on this site. Extensive, wide ranging views of the Thames Valley reaching as far as the Kent Downs can be enjoyed from this edge, which is managed as part of Thorndon Country Park. The sustained relevance of these views is reflected by the early 18th century addition of a series of features to the designed landscape — the Octagon Plantation and Pigeon Mount — which would later be retained and incorporated into Lancelot 'Capability' Brown's subsequent mid-18th century re-landscaping of Thorndon Hall Park. The retention and appropriation of features celebrating these views despite significant changes to the designed landscape therefore makes clear that the elevated views from the southern edge of Thorndon Country Park make an important contribution to the setting of these assets and their significance. While they sit at some distance from the proposed development, it is unclear from the available information whether the data centre buildings would be visible from them and whether a judgment has been made as to whether there would be harm as a result. Assessment of Significance: Non-Designated Heritage Assets The proposed development site occupies a large area (almost 220 hectares) of greenfield land entirely within an Archaeological Priority Area (APA) prepared by GLAAS in support of the Havering Local Plan 2016–2031: 'Havering APA 3.3 Havering Prehistoric Potential,' and immediately adjacent to 'Havering APA 2.18 North Ockendon'. The historic landscape within and around the site is one with medieval roots and it is crossed by even earlier routeways. This corner of Essex preserves a once-characteristic pattern of small medieval settlements on high points amid a north–south grain of communication routes to the Thames marshes. The hedged fields within the site were functionally associated with the surrounding villages and farms. The Mardyke too was a navigable route as far as Bulphan until the late C19th, and even its shallow tributaries were used by local farmers in shipping hay and corn to London. Whilst the ES asserts that that there are no visible heritage assets, this ignores the significance of the historic landscape itself. Despite the availability of historic maps and consequent likelihood that most of the hedgerows would meet historic criteria under the Hedgerow Regulations, no assessment has been made of their significance. We cannot endorse the Cultural heritage statement (MOLA 2026, 4.2.6) conclusion that "The fields within the agricultural landscape which make up the site do not possess any heritage significance in their own right and therefore have not been considered in this section [Significance and Setting Assessment]". The proposed development site occupies a large greenfield site with recognised archaeological potential for prehistoric, Roman and medieval/post-medieval archaeology. Cropmarks within and near to the site hint at the presence of remains from later prehistory onwards, whilst fieldwork for the nearby Lower Thames Crossing has discovered many previously unknown assets. Parts of the site overlie geological deposits that could yield material dating from the Palaeolithic (Old Stone Age). Previous modelling in the area, including a predictive model of Palaeolithic potential in Essex and work carried out prior to consent of Lower Thames Crossing, map areas of moderate to high Palaeolithic potential immediately adjacent to this site, largely in the area between Wennington and North Ockendon; the site is located on the border with Essex and is effectively an extension of this mapped area. Finds of this period are significant as they are some of the oldest artefacts in Europe. Rare Palaeolithic finds have been recorded within this APA, including evidence for in situ Palaeolithic flint industry was excavated in 1924 during road construction for the Southend Arterial Road (A127). The middle palaeolithic buried 'Ockendon Channel' and contemporary activity alongside it may be harmed by the scheme Within the site, the Greater London Historic Environment Record (GLHER) notes several known assets including a group of cropmarks identified from aerial photographs, forming a rectangular feature, likely a prehistoric enclosure and ring ditch. It also notes several historic farmhouses — Bullens and Herds (delisted in 2022 as structure now no longer standing) and Brasenose Farm, a Tudor farmstead — and the location of a Second World War Anti Aircraft Battery. Preservation of archaeological remains across the site is anticipated to vary from moderate to good because of its undeveloped agricultural history and presence of alluvial deposits. Alluvial deposits can both conceal buried archaeological remains and protect them from plough damage. Organic alluvium can preserve paleoenvironmental proxies and the organic artefacts and structures. Example of materials include pollen, diatoms, waterlogged plant remains as well as timber artefacts and structure such as boat or trackways. Extensive field evaluation for the Lower Thames Crossing to the south and east of East Havering Data Centre has discovered many previously unknown sites (mainly prehistoric and Roman) demonstrating that new discoveries of heritage assets of archaeological interest are likely on such a large greenfield site. Despite clear evidence of archaeological interest and potential, and recognition in the application that field evaluation will be necessary, no pre-application fieldwork has been carried out to properly understand what heritage assets are present, the harm to significance from this proposed development and options for mitigation.

		The Heritage Impact of Development The development site is almost 220 hectares of largely undeveloped land. The data centre campus and its infrastructure, the ecopark and related engineering and enabling works are all likely to have a major impact on non-designated heritage assets of archaeological interest and historic landscape features within the site as well as having a lesser impact on the setting of nearby designated heritage assets. Currently the scheme is described in outline. As the design develops there should be clear mechanisms to assess and mitigate any above or below impacts. Assessment of the significance and impact to the settings of some designated assets (mentioned above) are not included within the LDO documentation and should also be included in the submission. We consider that the LDO itself should include a requirement that assessments of the effects of each stage of development on designated assets identified as vulnerable to harm in the environmental statement as development progresses, together with any mitigating measures. The Build Zones and proposed mounds and other landscaping works will impact on the legibility of the historic field systems present at this site, and in some case propose to remove these hedgerows. The proposed Landscape and SUDS strategies do incorporate some of the historic hedgerows into the wider scheme, with some impact through removal to avoid Build Zone D. The applicant should provide an assessment of the hedged fields taking account of the historic importance criteria in the Hedgerow Regulations and show on a map the impact of development on them. In the recent stakeholder consultation meeting, the applicant has stated that as the scheme is based on build zones and design code parameters, there is enough presumed flexibility to avoid archaeology if necessary. However, the ES states that "No embedded mitigation measures intended specifically to preserve buried archaeological remains in situ have been incorporated within the proposed development design," (ES Chapter 6, 6.104) nor is there any mechanism included within the draft LDO to action this. Extensive excavation will be required to make the data centre build zones level, as the site slopes W-E toward the Mardyke. The proposed development also includes extensive groundworks outside these build zones, including a Landscape Strategy (Feb 2026) outlining 642,504 cubic metres of cut and fill excavation, with a proposed change of over 11m in Build Zone G. The excavation will likely cause the total loss of any archaeology within the footprint. Likewise construction of the proposed mounds could cause substantial harm during their construction and compact any surviving archaeology beneath them. We seek further clarity on the flexibility of the grading of the build zones as well as the large attenuation ponds, reservoir or proposed extensive cut/fill landscaping works proposed within the surrounding ecology park. The proposed development may require a large amount of water for the data centre and horticultural facilities. Any changes to the hydrological systems caused by site works will have an effect on the Mardyke and any preserved significant archaeological remains downstream. This effect should be assessed following Historic England guidelines. Where mitigation of archaeological harm cannot be fully achieved, the balance of harms through public benefits should be investigated and included in the proposal. These might include a community engagement and educational programme, preservation, display and interpretation of key remains included within the proposed visitor centre. Planning Policies NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF 207 says local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. A field evaluation may also be necessary. NPPF 208 requires that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. NPPF 212 places great weight on the conservation of an asset's conservation when considering proposed development's impact on it, irrespective of the level of harm. It goes on to say that any harm or loss of significance requires clear and convincing justification (para 213). NPPF 213 footnote (75) states that non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets. Proposals that would cause substantial harm to designated heritage assets should be refused unless that harm is necessary to secure substantial public benefits that outweigh that harm (NPPF

		214) while impacts from less-than substantial harm should be weighed against public benefits (NPPF 215). Non-designated heritage assets may also merit conservation depending upon their significance and the harm caused (NPPF 216). Conservation can mean design changes to preserve remains where they are. If preservation is not achievable then if you grant planning consent, local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) proportionate to their importance and the impact and make this evidence publicly accessible (NPPF 218). NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Applicants should therefore expect to identify appropriate enhancement opportunities. Position and Recommendations Major development in the settings of the North Ockendon conservation area and Bury Farmhouse would likely cause less than substantial harm, with the degree of harm depending on the effectiveness of mitigation measures specified in the design code. But the cultural heritage assessment is incomplete because the effect on designated heritage assets in Brentwood District has not been considered. We have reviewed this proposal but require more information before we can advise you on the effects on archaeological interest and their implications for the planning decision. The Statement of Reasons suggests moderate weight be attached to harm arising to archaeology (13.14) but implies that the gap in the evidence base be used to assign this moderate weight only. The Environmental Statement chapter acknowledges Major Adverse harm, and significant adverse residual effects even after the proposed implementation of archaeological mitigation (6.183). The suggested strategy to undertake any archaeological evaluation post-consent does not allow compliance with planning policy which seeks to avoid or minimise harm to archaeological significance through design as well as through appropriate mitigation. This strategy does not allow for appropriate mitigation of 'unexpected' discoveries of high archaeological significance, through appropriate avoidance of harm. The proposed approach to buried archaeology is therefore not consistent with planning policy and good practice. Despite recognition of the site's archaeological potential and risk of Major Adverse affects, no field evaluation work has been carried out to establish what heritage assets are present and what significance they hold. The assessment of significance does not provide sufficient information to avoid harm or minimise it through design and appropriate mitigation. Field evaluation is necessary. GLAAS should be consulted to agree an appropriate evaluation strategy based on local conditions and experience. The proposed condition within the draft LDO is not sufficient to safeguard archaeology. It is not precise and does not make allowances for a multi-stage approach (evaluation (NPPF 207) followed by mitigation (NPPF 218)) essential for such a large project. It makes no specific provision for recording and dissemination, or opportunities for public benefit (required by NPPF 218). Enforcement of this condition as worded would be difficult. It does not provide sufficient safeguard for discoveries of national importance nor respond to the evidence gap in the application's assessment of significance, conditioning the avoidance or reduction of harm through foundation design mitigations. Phasing the archaeological work in this way risks piecemeal fragmentation of investigations. Large phased projects such as this are normally governed by an Overarching Written Scheme of Investigation prepared before development commences with compliance secured through a condition. Archaeology is not even mentioned in the Code of Construction Practise. Next steps As archaeological adviser to London Borough of Havering, GLAAS would have welcomed earlier consultation on this proposal and now suggest a meeting with the local planning authority and design team to discuss further how best to address these issues to ensure the scheme is compliant with policy and guidance with regards to the historic environment. We understand that this is an important project for the borough and would like to work with you to ensure that the archaeological evidence and strategy is policy compliant and reflects good industry practice.

173	Individual	We are really happy to note this, as we believe this will us, as only Havering but surrounding areas. I strongly support this initiative.
174	Individual	.Wonderful update. This will make a meaningful difference across Havering and beyond. I'm proud to support it.
175	Individual	Fantastic news. This initiative will uplift Havering and neighbouring communities. I'm happy to stand behind it.
176	Individual	A very welcome development. The wider community, not just Havering, will gain from this. I offer my full support.
177	Individual	Really pleased with this progress. It promises positive outcomes for Havering and surrounding boroughs. I'm strongly in support.
178	[redacted]	Ref: LDO0001.26 East Havering Data Centre Campus Draft Travel Plan Objection On behalf of [redacted] I would like to raise an objection to the Havering Data Centre Section 106 Agreement which is woefully inadequate vis-à-vis Cycling Facilities. Reading through the section 106 conditions that will be committed to this development (attached), there are several footpath improvements but few cycling-related conditions so we feel they really lack any ambition considering that this is a multi-billion pound development. We would like to see at the very least a LTN1/20 style cycle route connecting the data centre to Upminster, South Ockendon and West Horndon station, linking in to NCN 136 at Harold Wood Station The construction period is expected to last 8 - 10 years, not to mention the many years for the Lower Thames Crossing to be constructed, effectively shutting off roads to the East of Upminster as far as cycling is concerned. Here are some comments regarding transport which we hope you will take into consideration when making any final decisions on the LDO. Walking & Cycling The Transport Assessment (TA) shows the site is fundamentally inaccessible and the TA repeatedly acknowledges that walking and cycling are not viable modes for staff or visitors. Relevant extracts are: • "The distances to nearby residential areas and the lack of continuous footway provision… means use of walking as a main mode is likely to be very low." (TA p.89) • "People are not likely to feel safe or relaxed walking/cycling on Fen Lane during the hours of darkness." (TA p.87) • "There is no street lighting… no footways… very low number of people walking… sense of isolation." (TA p.87) The TA itself confirms that the site is inherently hostile to walking and cycling, with no continuous footways, no lighting and rural lanes that are unsafe in darkness. The TA concedes that walking and cycling will be "very low" and that users "are not likely to feel safe or relaxed" on Fen Lane or Ockendon Road. This directly contradicts London Plan Policy T2 and T5, which require developments to enable active travel, not merely acknowledge its impossibility and NPPF Chapter 9 para 117 (quoted in the Draft Travel Plan.pdf). Electrically powered bicycles are already becoming commonplace and give employees and visitors the option of leaving their car at home. These are likely to be even more popular by the projected completion date of the data centre and demand for low-traffic routes is likely to increase considerably. The economic and environmental cost of providing cycle facilities is tiny compared to major infrastructure such as the data centre. Our current road infrastructure is poorly maintained, for example, the numerous potholes which create a real danger to cyclists and pedestrians as well as serious damage to motor vehicle tyres and suspensions. This development will further increase this damage to roads due to heavy vehicles and general traffic volumes. Public Transport TA confirms the site is not served by viable public transport: The only bus service currently is the 370, running on Ockendon Road but the TA admits that no one can realistically walk to the bus stops in darkness or poor weather and are not likely to feel safe or relaxed walking/cycling on Fen Lane during the hours of darkness The proposal therefore relies entirely on a private shuttle bus, which is not public transport and cannot satisfy London Plan Policy T1 or T4. 1. Car Dependency The TA demonstrates that the development will be overwhelmingly car dependent, with up to 80–90% of users arriving by private car. This is fundamentally incompatible with London Plan Policy T1 (80% sustainable mode share by 2041) and Policy T6 (car parking restraint). The TA's own data shows the proposal will increase car dependency, not reduce it. 2. Abnormal Loads The swept path analysis shows that abnormal loads will require removal of street furniture, widening of footways and temporary traffic management at multiple locations. This demonstrates that

		the rural road network is fundamentally unsuitable for the scale of construction proposed. 3. Construction Impacts The TA confirms that construction will last up to 20 years and will require widening of Fen Lane, removal of traffic islands and extensive abnormal load movements. This represents a prolonged period of disruption incompatible with a rural village environment and contrary to London Plan Policy T7 (construction logistics). We understand your 'independence' determines that you do not share personal opinions with outside bodies or members of the public therefore we are not expecting a reply to our concerns only that you take all of the above into account before making any final decisions on this proposed development. Many thanks and could you please acknowledge receipt of this objection.
179	Individual	I totally object to this proposal to rush though the building of a huge data centre without serious regard for its detriment to not only residents but the sheer amount of water needed for this huge data centre. I am sceptical that any jobs will benefit the area. This is green belt land and no amount of an ecology park is going to offset the extra light noise pollution and traffic that will be the result of this monolithic building. It is ludicrous to allow no real public consultation instead it appears to ride roughshod over the wishes of people like me who live locally. A full and proper consultation must be held as this development has some serious risks attached to it that need to be fully investigated and discussed. I therefore formally object to this development proceeding until a more through consultation with local people goes ahead
180	Individual	. Wonderful update. This will make a meaningful difference across Havering and beyond. I'm proud to support it.
181	Individual	I disagree with the Data Centre proposals. It will negatively impact the local environment and remove green belt land.
182	Individual	An LPA promotes an LDO if the Council Administration are in favour and wish to facilitate a particular development. The Council Leader and Cabinet Member for Regeneration have publicly supported the proposed East Havering Data Centre for financial reasons, with the Council Leader describing it as Havering's "Treasure Island"! However, the minority HRA Administration has no mandate to build on prime Green Belt land as almost all councillors were elected on a promise to save our Green Belt and potential financial benefits are not a material planning matter. As no very special circumstances apply, approval for a mega data centre would de facto end all Green Belt protection in Havering, as very special circumstances is meant to be an onerous test, not a glib phrase to be used as convenient. However, the impact on Green Belt cannot be solely focused on the data centre but must include the previously approved adjoining BESS. The BESS was determined as a separate planning application, but is really part of the same project as a data centre cannot operate without a BESS. So, even if a BESS and date centre judged separately were deemed acceptable, the impact of both need to be considered as both are part of the same project and cumulatively are a clear breach of Green Belt rules.
183	Individual	Good morning, I am writing as a local resident to formally object to the proposed Local Development Order for the East Havering Data Centre. 1. Inappropriate Use of an LDO The use of an LDO to grant permission in principle for a large-scale industrial development on Green Belt land is not appropriate. It removes the ability for proper scrutiny of individual phases over time, despite the development potentially extending to 2040. 2. Failure to Justify Green Belt Development The proposal does not demonstrate clear Very Special Circumstances. The benefits cited—economic growth, digital infrastructure, and sustainability—are not site-specific and could be delivered elsewhere. There is no robust evidence that alternative brownfield or previously developed sites have been properly assessed. 3. Harm to a Sensitive Green Belt Location This area forms a particularly narrow section of Green Belt and plays an important role in maintaining separation between communities, especially given increasing development pressure from nearby areas such as Thurrock.

		As someone familiar with this area, it is clear that once this gap is compromised, it will be significantly more difficult to resist further encroachment. The cumulative effect risks a gradual erosion of the Green Belt rather than a single isolated development. 4. Overstated Energy Justification The claim that this site is uniquely capable of providing the required clean energy is not substantiated. Modern data centres routinely source renewable energy via the national grid using off-site agreements, combined with on-site storage. By the time this development is completed, the UK's electricity system is expected to be largely decarbonised in line with the UK Net Zero Target. This further undermines the argument that this specific location is required to access clean energy, as low-carbon electricity will be widely available. 5. Limited Long-Term Employment Benefits The number of permanent jobs associated with the development is relatively low compared to its scale. Many roles are highly specialised and, based on current trends, are likely to reduce over time due to increasing automation. This raises concerns as to whether the long-term local economic benefits are sufficient to justify the permanent loss of Green Belt land. 6. Risk of Technological Obsolescence Technology in this sector is evolving rapidly. Over the past decade alone, computing infrastructure, energy efficiency, and cooling methods have changed significantly, driven by companies such as Amazon Web Services, Microsoft Azure, and Google Cloud. Given the proposed build-out to 2040, there is a clear risk that a large, fixed-format facility designed today may not align with future needs. This would result in permanent land use change for a development that may not remain optimal over time. 7. Prolonged Construction Impact on Local Roads The scale of the development will result in long-term construction activity, likely over a decade. This will place sustained pressure on local roads used daily by residents, particularly around Upminster and North Ockendon. These roads are not designed for prolonged high volumes of heavy goods vehicle traffic. Based on local knowledge, even current traffic levels can create congestion at key points, and this proposal would significantly worsen those conditions over an extended period. 8. Failure to Properly Assess Cumulative Impact The application does not demonstrate that cumulative impacts have been robustly assessed. In particular, the interaction with the Lower Thames Crossing and wider regional development has not been fully considered. There is a real risk that overlapping construction periods will result in sustained and unacceptable pressure on the local transport network, far beyond what is presented in isolated assessments. 9. Disproportionate Local Impact Without Compensation Residents living closest to the site will experience prolonged disruption during construction and a permanent change to the character of the area. There is no clear compensation mechanism for those affected. From a local perspective, this creates a clear imbalance between the limited local benefits and the significant and long-term impacts on the surrounding community. Conclusion

		For the reasons outlined above, the proposal fails to provide sufficient justification for development on this Green Belt site. It would result in permanent harm to a sensitive area, with impacts that are not adequately mitigated or justified. I respectfully request that the proposed Local Development Order is not adopted.
184	Individual	i cant imagine that there are any people that are for this monstrous project , taking green belt land that you have no business taking , killing everything in your way. There are already major projects proceeding near by, and the impact of these combined projects is too much, the energy and water it will consume is too much the heat that it will produce is too much, [redacted] I strongly object to your proposals,
185	Individual	I have grave concerns. The amount of disruption the construction will have on small B roads in the surrounding area. The whole area is highly sensitive to disruption on major trunk roads including the M25, junctions 30/31 of the M25 Dartford Tunnel/Bridge, A127, A13, with knock on effects spilling over from the A406 and M11. 20 years of misery that equates to, [redacted]. There are many other housing construction projects in the surrounding areas too. Has anyone looked at the whole impact within the area inclusively. What about the potential additional data centre site at the old Arena Essex site? Are you collaborating with Thurrock Council to ensure the picture as a whole is viable? The resources required like electricity and water to run the construction works and maintain post build would be of high demand. I am concerned for local residents priority of these resources over the data centre. I am concerned for the health impact the build will have on all life. The offset in the LDO appears very lame, like a booby prize. The consultation period should be extended to the full period. I am suspicious that you have already signed up contracts with suppliers already. One of the [redacted] presenting at the Havering Town Hall consultation said she had already secured a contract with the energy provider. Data centres are also considered important infrastructure of a country, putting us right on the map as a target of war. I strongly object to the data centre proposal. I also have no confidence or trust in the administration of this whole project in the realm of residential protection or the prevention of green belt consumption.
186	Individual	Totally object to this development. After having ULEZ forced on us to improve air quality, this development would cause so much pollution, cause a huge increase in traffic and use valuable green belt. The development would be huge and out of character. It is a massive NO from me
187	Individual	LDO0001.26 Hello Please reject the planning application for the Data center coming to Havering. Not only would it help accelerate the climate crisis, it has been proven that it harms people living near the area https://youtu.be/DGjj7wDYaiI?si=Uuk5dC7y9IZwsGvB The jobs and money it will generate will not outway the harm it will being to the climate and community. Can you prove that water will be prioritised for residents instead of the data center, bills will not increase as a result of the data center and that the air and waterways will not be affected? They are plently of ways to bring more jobs and boost the economy in Havering that doesn't sacrifice the planet. Thank you
188	Individual	I am writing to register my **strong and formal objection** to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: **1. Unacceptable Environmental Impact and Noise Pollution** The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Upminster and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. **2. Strain on Infrastructure and Energy Grid**

		Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Upminster, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. **3. Character of the Area and Green Belt/Land Use** Upminster and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. **4. Lack of Local Benefit and Use of LDO** It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Upminster. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. **5. Health and Visual Impact** The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. **Conclusion** I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
189	Individual	I support the East Havering Data Centre project as a vital investment in our borough's future. Unlike residential developments such as Beam Park, which have suffered from significant infrastructure lag and a lack of local facilities, this project represents a self-sustaining industrial hub that brings its own momentum. For residents in RM12 and the wider area, this means the creation of nearly 1,000 high-tech, high-wage jobs. I am particularly supportive of the partnership with the University of Leicester, which creates a clear educational and career pipeline for local students to enter specialized fields like AI infrastructure, cybersecurity, and thermal engineering. In an increasingly volatile global climate, I view this project as a matter of national security. By housing our data on British soil within a site designated as Critical National Infrastructure (CNI), we reduce our reliance on foreign-owned servers. While I recognize that such a significant asset requires high-level security, the "physical hardening" and resilience protocols required for a CNI site make it a more responsible choice for the UK's digital sovereignty than continued outsourcing. The proposed "closed-loop" energy system is a primary reason for my support. Rather than allowing server heat to be wasted, the plan to power 50,000 square meters of indoor horticulture turns a byproduct into a resource, potentially producing thousands of tonnes of fresh food annually. This is a much smarter use of land than traditional low-yield agriculture and positions Havering as a leader in sustainable technology. While the project uses Green Belt land, the commitment to a 113-hectare Ecology Park provides a tangible benefit for residents. This plan turns currently inaccessible private farmland into a managed public space for the community. I support the use of the Local Development Order (LDO) to fast-track this project, provided it includes legally binding "infrastructure-first" guarantees to ensure the park and educational facilities are delivered alongside the data halls. Specifically, I would like to see a "Local-First" apprenticeship guarantee for Havering students to ensure the wealth generated stays within our community.
190	Individual	This is an appalling idea the effect on the community and environment is likely to be a catastrophe. [redacted] if you are so keen to have it, build it in the middle of your boroughs
191	Individual	1. This is close to the Brentwood borough council boundary and yet there has been very little publication or engagement with the residents of the Brentwood area. It appears that they have been purposefully ignored as you are aware that you will receive increased negative responses and concerns from residents of this area as it is a more affluent area with a higher literacy rate. 2. This proposal takes advantage of residents in areas that have lower literacy rates and higher poverty rates who will be less likely to respond to the consultation and will be in more need of jobs involved in the building of the centre, therefore not focusing concerns on the longer term risks of the data centre location. 3. It does not appear much consideration has been given to the impact of the data centre on the local area. Data centres in the US are expected to cause over 1,300 excess deaths per year by 2030 as a result of air pollution. Therefore you are putting the health of the local residents at an increased risk of ill-health and death, simply to bring profit to a company. What is the expected solution to ensure absolutely net zero percentage of increased air pollution across the entire area?

		4. There is very little long term research to show the impact on health of living locally to one of these data centres, but short term shows that residents report increased vertigo, migranes etc. And it is expected that longer term impact will be diseases such as cancer. What is your specific plan to negate this? 5. The light pollution that will be caused as a result of the data centre usage 24 hours a day will cause a significant impact to local residents and local wildlife. How can you claim to be an ecologically sound project when you will have a direct negative impact on the environment surrounding the centre. 6. The long-term impacts of both noise and light pollution include hearing loss, stress, insomnia, and decreased quality of life. What is your plan to ensure that this does not happen for local residents? 7. Data centers emit significant pollutants, such as nitrogen oxides, methane, volatile organic compounds, and fine particulate matter. According to a September 2025 study, these pollutants increase rates of respiratory diseases and cardiovascular conditions, and they elevate cancer risks among nearby communities. A 2025 model indicates that U.S. data centers in 2030 could cause approximately 600,000 asthma symptom cases and 1,300 premature deaths, exceeding 1/3 of asthma deaths in the U.S. each year, resulting in a public health burden of more than $20 billion. How can the NHS afford this particularly in one of the most oversubscribed and deprived hospital trusts in the UK? Has increased financial budget been agreed with the government and DHSC for this trust specifically to manage this? Has compensation been costed for to pay out residents you cause ill-health and death to? 8. Data centers require water to cool computer servers so they do not become too hot to function. A large data center will use up to 5 million gallons of water daily. Drawing from local water supplies, these facilities are slurping up resources that should be available to residents in water-scarce regions. In fact, data centers increase the threat of water insecurity, and thus dehydration and poor hygiene. How do you plan to mitigate this? Can you 100 per cent guarantee that you will not cause water pollution in the surrounding areas? 9. Data centers have typically not paid their fair share in utilities, particularly for electricity consumption, and in those situations other consumers (including residential customers) have had to pay more than they otherwise would. Utility companies identify data centers as large load customers, meaning that they require a lot more energy from the power grid. When a utility grid operator must add new infrastructure to accommodate growing populations or large load customers, rates may increase for all users in that region, despite attempts to regulate those increases or to allocate costs to the large load customer. In fact, utility grid operators will sometimes negotiate lower rates to incentivise large load customers to build in their territory, meaning that additional expenses must be covered by the other customer segments. Is there a written guarantee between the project, the electric provider and the consumers that there will categorically be no cost pushed onto the consumer. 10. Why has this area been chosen? Because in the US data centres are disproportionately built in low-income, high minority areas. And it appears that the exact same strategy is being used in the UK with the choice to build in one of the more deprived areas of the country. Why is this not being built in a high-income, affluent, majority white area? Why is this not being built in your own neighbourhood? 11. The Meta data centre in Georgia has adversely impacted the water supply in the local area. What is in place to ensure that this does not happen? 12. What is the point to this consultation? We do not have any weight to push for changes or stop this data centre as it will be forced upon the local area regardless. 13. [redacted] and I have seen absolutely nothing about this data centre until today, 2 days before the consultation closes, because it was mentioned to me by a neighbour. Please could you evidence exactly how you have advertised this and engaged with the public?
192	Individual	I object to the Data Centre proposal. I am concerned about the loss of Green Belt and farmland and the consequential effects on wildlife and the local ecosystem. I am also concerned with the power and water supply and how the data centre will affect my supply of power and water. The construction of the data centre will disrupt the local area through increased road traffic and noise.
193	Individual	I approve off this planning application. The data centre is necessary as we need to be self sufficient and not reliant on data centres in other parts of the world. The data centre will create jobs for local people. And the ecology park will be wonderful for nature and give public access.
194	Individual	I am writing to express my approval towards this data centre - a critical piece of modern infrastructure which should aide in regenerating the local area. The land is currently intensively farmed, so the creation of a dedicated ecology park will be marvellous to allow even more room for nature than there is now. Plus using the waste heat for greenhouses to still be producing food from the land is very innovative.
195	Individual	We strongly object to the proposed data centre development in North Ockendon on the grounds that both the process and the substance of the application are fundamentally flawed. Firstly, the use of a Local Development Order (LDO) in this case is deeply concerning. LDOs are intended to streamline minor or clearly justified developments, not to enable large-scale industrial construction on protected Green Belt land. The approach taken appears to limit scrutiny and restrict meaningful engagement with residents. Local people have struggled to obtain information, with key details withheld until late in the consultation process. This contradicts government guidance, which emphasises early and effective stakeholder engagement. The impression given is that approval in principle has preceded proper justification, undermining public confidence in the planning process.

		Secondly, the proposal represents inappropriate development on Metropolitan Green Belt land. The site comprises hundreds of hectares of open agricultural land, currently used for farming and rich in biodiversity. No convincing “very special circumstances” have been demonstrated to justify such extensive harm. Arguments relating to economic benefit or claims of “national infrastructure” are insufficient, particularly when the development does not directly serve essential public needs. The scale and nature of the buildings—large, industrial structures up to 21 metres high—would permanently erode the openness that Green Belt policy is designed to protect and contribute to creeping urbanisation. The environmental impacts would be severe and irreversible. The site and surrounding area support a wide range of wildlife, including protected and vulnerable species. Years of construction activity, followed by permanent industrial use, would destroy habitats and displace wildlife with little chance of recovery. Claims of ecological mitigation, including the creation of an “ecology park,” are unconvincing. Such measures cannot replicate long-established ecosystems, and proposed features such as newly planted trees or landscaped perimeters would take decades to mature, if at all. The development would also impose significant burdens on local infrastructure and residents. Construction over a period of up to a decade would bring sustained disruption, including increased traffic on unsuitable rural roads, noise, dust, and air pollution. Once operational, the facility would generate continuous background noise and consume vast amounts of electricity and water. There is little clarity on how these demands will be met without placing additional strain on already stretched resources or causing environmental harm. Furthermore, the claimed benefits are overstated and unevenly distributed. While the council highlights financial gains and reputational advantages for the wider borough, there is minimal direct benefit to the local community. Job creation figures are misleading, with most roles limited to temporary construction work and few long-term opportunities for residents. Meanwhile, the environmental and social costs would be borne almost entirely by the local area. Finally, approving this development would set a dangerous precedent for further encroachment on Green Belt land. It risks opening the door to additional industrialisation, fundamentally changing the character of North Ockendon and surrounding areas. For all these reasons, we urge the council to reject this proposal.
196	Individual	The data centre is not environmentally friendly, increased traffic, pollution, noise, bad for wildlife, increased water usage, unsightly and not wanted by local people.
197	Individual	I object to the data centre being built, since it will detrimentally impact the community, by taking up masses of farmland and greenery. It will also lead to a massive strain on our power and water resources, lowering the value of houses and land around it. The amount of pollution that would be produced is also something that would greatly negatively effect the community and environment.
198	Individual	LDO0001.26 How can a an ldo be given to a purpose like this even after as readinfg as much of the information as in the shorts amount of time there are some big holes in it that need explaining. If the ldo is given they can take peoples personal property as the ldo says that the company can how is that fair to people in the local area losing land to something no one wants. What about the so called jobs for local people that isn't actually there for them. We where told from day one that the data centre had to be there because of the sub station so it could just be plugged in but now we are told that its not big enough and 2 new ones need to be built the electric in the area is not great to start with and you want to add a great big dirty data centre so the council doesn't care about its residents at all, and what about the water supply the water pressure is so low sometimes you cant take a shower so whats going to happen to it when the data centre is using it all it will be taking away basic living essentials away from residents and what will happen to all the dirty water from the data centre go back into the water supply and contaminate it. What will happen with the roads in the area they are already crumbling with heavy lorries,buses and increasingly amount of cars what is going to be done. And how many data centres has the company built like me think none and they want to put it on virgin green belt where in the sense is that and once its built its basically going to be useless as technology wpuld jave already moved on. And the so called ecological park we already have one there and you want to destroy it and build on it then make a man made one where is the sense in that, where are the ecological surveys that need to be done for the endangered animals that live there. Giving them an ldo means none of us residents that live here dont get a say in what happens to this little village your saying you dont care about us we dont matter the animals dont matter all that matters is the council will get some money and kill off anything that matters.
199	Individual	I strongly object to the proposed East Havering Data Centre Campus Local Development Order. I am a resident of Cranham, London Borough of Havering. I have am not opposed to data centres per se but to the proposed siting on Green Belt land. My main objections relate to: 1. A wholly inappropriate development on Green Belt, contrary to Green Belt policy.

		2. The environmental impact of the proposed data centre and its construction. 3. Inadequate scrutiny resulting from the inappropriate use of the Local Development Order procedure and the short period of consultation. Green Belt North Ockendon, Cranham and Upminster are bordered by Green Belt land, which has prevented development for many decades and maintained rural land close to our towns and villages. This is much treasured by local people and a major reason [redacted] and many other people, chose to live in Havering. [redacted]. If this development is permitted it may well lead to further developments on nearby Green Belt land, resulting in the loss of Upminster's rural boundary and altering its character. Green Belt land is afforded a high level of protection in National Planning Policy, illustrating its importance for: - Preserving the character of towns and villages - Providing open spaces for communities - Preventing urban sprawl - Safeguarding the countryside from encroachment For these reasons large scale developments such as the proposed data centre require 'very special circumstances' to be shown before they can be approved. I do not consider that very special circumstances have been demonstrated for this proposed development. Data centres are normally sited on former industrial or brown field land, not agricultural land nor Green Belt. Little evidence has been presented to show that alternative sites in more suitable locations have been fully considered. Environmental Impact The proposal raises significant environmental concerns. There will be loss of habitat for wildlife, including insects, birds and mammals, including badgers who are known to be resident on the proposed site. Whilst the proposed 'ecology park' may partially mitigate for this, the loss, for example, of centuries-old hedges, means that it will not be equivalent to the current biodiversity value. There will inevitably be a time interval before the 'ecology park' is established, during which time wildlife such as badgers and nesting birds will be forced away by the disruption of construction and may never return. Local Development Order Local Development Orders are typically intended for small developments and the use for this huge data centre is totally inappropriate. Employing a Local Development Order, along with the minimum permitted consultation period of 28 days, reduces oversight of the environmental impacts of the proposed development and prevents local residents from fully scrutinising the development. This is a huge and indeed strategic development and in order to ensure full assessment and accountability, should be dealt with through the normal process of individual planning applications. Other Concerns

		My other concerns include: Any benefits for local people are far outweighed by the negative impact of the data centre. It will create relatively few jobs and many of these will not be taken by local people. For example, the proposal states (Travel Plan) that produce workers for indoor horticulture 'to be housed in shared accommodation and travel to site by coach', which implies that they are not expected to be Havering residents. The large number of lorry movements during construction will impact on local people, not only those of North Ockendon but other residents of Havering. Electricity grid capacity. Data centres are known to be very energy-intensive and the development may impact on energy resilience for Havering. The Travel Plan shows that most people will travel to the site by private car, increasing congestion and emissions in Havering. The development, both during and after construction, would impact on air quality for the residents of Havering. The data centre would be a potential target for terrorists or other hostile entities, putting residents of Havering at risk.
200	Individual	Staring at the little text box on your form, it's difficult to know where to start. Your description of this proposal runs to nearly 3000 pages of dense text and diagrams, which we're expected to read, understand, consider, and react to, all in the space of 4 weeks over Easter. I consider your choice of an LDO mechanism to be quite inappropriate for such a major development, flying as it does in the face of democratic choice. However, that little text box is staring back at me - so here goes. The area of countryside immediately outside the M25 marks the boundary of the urban environment within. That is one of the purposes of a Metropolitan Green Belt, and the land in question is a perfect example. Many local residents have moved out from inner London precisely to enjoy the proximity of a rural landscape, clean air, abundant wildlife, peace and quiet. The proposed development would decimate all those benefits at a stroke. It would also considerably reduce local production of staple food crops, at a time when we should be making every effort to preserve and improve our self-sufficiency. The rules state that development on green belt land is only justified under very special circumstances, which in this case do not appear to exist. As regards the so-called "ecology park" sweetener, no such engineered space can compensate for a loss of long-established and naturally-balanced countryside, and I regard the idea that the thing could become a leisure destination as an extreme example of wishful thinking. The 600MW power taken by the data centre would dwarf the domestic consumption of the entire Borough of Havering, and would no doubt take priority over rising future requirements for vehicle charging, heat pumps and air-conditioning. That would inevitably put homes at risk of power shortages, something no local authority should allow. There would be an enormous amount of noise and disruption during the 10-20 years of construction, with few jobs created in the longer term. And within that timescale the technology would almost certainly become redundant, leading to a massive amount of electronic waste and a redundant industrial site. In contrast, an intelligent way forward would be to consent to several smaller data facilities, built on brownfield plots, using agile technologies that don't hog local resources. Last, but by no means least given the geo-political situation, the proposed development would make East Havering a prime target in event of war. No local authority should put its citizens at such grave risk for no good reason. Of the many threatened green belt encroachments in the area, this is surely the least justifiable, and the easiest to turn down. I strongly recommend that you reject it forthwith. Thank you for taking the time to read my objections.
201	Individual	Objections to East Havering Data Centre LDO and impacts on the local Mardyke River My objections to the East Havering Data Centre LDO document are made on the grounds that the assessment of risk to the Mardyke river has not been substantiated and in cases misrepresents the evidence and risks systemic downplaying of risk. However, firstly I would like point out that, given the short consultation period, I have only been able to review evidence related to the local watercourse and will not have the time to review all other environmental and social aspects of this vast document. With 2700 pages and 28 days, this amounts to reading and understanding approximately 100 pages a day. I challenge anyone, let alone residents in full-time work, to meet this quota while reviewing the highly technical information which is entirely necessary in order to properly understand the impact of this development. 1. Lack of evidence and detail provided for the low level of impact that has been assigned for the river environment throughout the proposal.

		Throughout the LDO there is a systematic downplaying of risk without sufficient detail and justification. For example, in Table 8.11. (696 Agenda Document, page 696), the construction impact on biodiversity is described as “N/A”. This does not acknowledge the obvious disruption to the natural habitat during the construction phase of the data centre. As the LDO development period is planned for a minimum of 17 years, the current proposal does not adequately account for this long-term risk to biodiversity that will be brought about by construction activities, including excavation, run-off into the Mardyke and noise pollution. Particularly, is it acknowledged in Chapter 12 of the Environmental Statement (Appendix 10) that the Mardyke river has a medium sensitivity to sediment loading, changes to hydrodynamic status, and water quality status. Despite these acknowledgements, the individual impacts are assessed as negligible to minor, with no clear explanation of how these assessments are made. I am not confident that the risk assessments could be replicated, and we as the reader are left having to trust the low assessments of risk. They are further assessed as having medium to long-term effect. Even in light of a (apparent) low assessment of risk, there is no assessment of the impact that would result from chronic (low and long term) risk to the river. Especially when viewed cumulatively, the effects on biodiversity of the Mardyke river from these risk factors should be acknowledged, which they are not. It is stated further that “On-site management controls summarised in ES Chapter 4 would ensure the magnitude of impact [of sediment loading] on the Mardyke catchment would be low”. However, on inspection, there is no detail within ES Chapter 4 regarding how any on-site management controls will be used to protect against this particular risk. This is despite the fact that the large areas of soil and piles of cut and fill material are acknowledged as being “highly susceptible to erosion”. It is therefore not possible from this documentation to be certain of a low level of risk to the Mardyke river health and biodiversity, and the continued exposure over the 17-year construction. Regarding the hydrodynamic status of the river, the risk is assessed as low “when considered relative to the size of the catchment” (ES chapter 12). It is not clear what the relevance of the size of the catchment is in this instance. A watercourse is a continuous habitat whose upstream condition can vastly affect the downstream extent, which has been freely acknowledged in this documentation. It has not been quantified within the report the expected impact on the hydrodynamic regime resulting from the construction. 2. Misrepresentation of evidence The Mardyke River is already a highly modified waterbody with poor ecological status. The agenda document (page 453, section 2.7) claims that the Mardyke will meet the target condition of moderate without the need of any direct works due to taking it out of arable production. However, it is not clear from the proposal how this is the case. In Appendix 24 “Biodiversity Net Gain Assessment – Appendix C: River Assessment” under section 4.1. “Recommendations for further surveys” it is stated: “Once precise details of the proposed development for the Site are finalised, a post- development “scenario” river condition assessment could be undertaken to provide an indication of whether the proposed development, and its associated habitat creation and enhancement, would lead to improvement or reduction in the watercourse’s condition.” This river assessment clearly states that a further river assessment is required in order to determine whether there would be improvement to the watercourse’s condition. It would be a misrepresentation of this assessment to suggest that the Mardyke will meet its target condition as a result of this development, as it is within the main report. 3. Loose threads and dead ends in the network of documentation I am particularly concerned about the scale and fragmentation of this documentation. It has been incredibly difficult in the short time given for consultation to verify the veracity of statements and assessments. However, even in the limited amount of documentation I have had time to review, I have several times found that evidence referenced to in the appendices is either not there or misrepresented. For example: • ES Chapter 12 Section 12.46: Reference is made to summaries in ES Chapter 4 of on-site management controls for sediment loading, but this information is absent). • The main agenda document (page 453, section 2.7): claims that the Mardyke will meet the target condition of moderate without the need of any direct works due to taking it out of arable production. However, in Appendix 24 “Biodiversity Net Gain Assessment – Appendix C: River Assessment” under section 4.1. “Recommendations for further surveys” it is clearly stated that a further river assessment is required in order to determine whether there would be improvement to the watercourse’s condition. Just these two examples demonstrate that the LDO is littered with dead ends and loose threads. I am greatly concerned by the effort required to navigate the vast network of chapters and appendices only to find that the evidence has been misrepresented. How can an honest assessment of this LDO be made with such inconsistencies buried so deep within the documentation and with so little time to review it? Summary Given the concerns outlined above, it is more likely that during the development construction phase, the medium to long-term condition of the river is likely to be degraded, particularly in relation

		to sediment loading, which is surely greater than the current arable risk, due to the large-scale excavation works required for this 400,000 sq-m development. This will have a negative impact on the water quality and morphology of the Mardyke and subsequently its associated habitats and species of fish and invertebrates. I urge the planning committee to reconsider this development due to an inadequate assessment of impact on the state of the locally important River Mardyke and associated habitats.
202	Individual	I wish to comment and object to the proposed East Havering Data Centre Campus Local Development Order, for the following reasons - 1. The land is Green Belt. As an Upminster resident the countryside is very important to me and one of the reasons why I chose to live here. Green Belt rightly has strong protections and this proposal does not meet the Very Special Circumstances required to permit its construction Green Belt land. 2. The affect of lorry construction traffic and cars of workers and visitors to the site on our already busy local roads. The air and noise pollutions this will cause, plus the extra time more traffic will add to local people's journeys, something which as a local coach driver I am very aware. 3. The affect on wildlife which will not be anywhere near mitigated by the proposed 'ecology park'. 4. The inadequate consultation process which means that many local people are not aware of, or do not understand, the full implications of this proposed development. 5. The proposed site is wholly inappropriate. The data centre should be built on a former industrial or landfill, not agricultural land or Green Belt.
203	Individual	I would like to object to this monstrous data centre being built for the following reasons: 1. Erosion of the Green Belt - the land this is proposed for is Green Belt land which is supposed to be protected. If you build on it, you will never get it back. Land is designated as Green Belt in order to prevent urban sprawl, protect ecosystems and wildlife habitats by preventing development across large areas. They help maintain biodiversity, regulate temperatures, reduce flood risk, and improve air and water quality - all of this will be lost if you build on it and an 'ecology park' will not make up for it. Beautiful countryside is something that Havering can be proud of, however a data centre of this magnitude will destroy it. This will be a permanent urbanisation of rural land, which is a core concern of Green Belt policy, and the proposal does not meet the 'very special circumstances' required. 2. Damage to ecosystems that cannot be restored by an ecology park. This development would see an immediate biodiversity loss, and the ecology park would provide slow and uncertain recovery - woodland can take over 15 years to reach even a 'moderate' condition, and some habitats only ever reach 'moderate' condition, not 'high' condition. Furthermore, newly created habitats are artificial and managed, which means they lack the complexity of long-established ecosystems. An ecology park simply cannot provide the same ecosystems that are currently in place. 3. Visual intrusion of the natural landscape - the size of the data centre would not fit in with the natural landscape and would create an eyesore. The proposal does not fit in with the existing character of the surrounding area in terms of design, appearance, or materials. It would be over-bearing - the scale and bulk of the development would be too large, oppressive, and out-of-scale for the natural environment. The development would also significantly degrade the visual amenity of the public, for example for those taking walks in the countryside. 4. The proposed data centre could make us a target in the event of a war which, given the current situation across the globe, would leave me feeling very unsafe as a resident of Havering. 5. Badgers have been seen at the site, including a badger sett. The Protection of Badgers Act 1992, makes it illegal to willfully kill, injure, or disturb them or damage their setts. There are documents available related to the badgers being seen, including police reports.
204	Individual	I am objecting to this proposal due to the following reasons: 1. The heat, noise and air pollution that will be created during the building process and the running of the data centre. I am particularly concerned about air pollution [redacted], and moved out of Central London to Havering for the purpose of living in cleaner air, which this project would negate. 2. The amount of water and power needed for the data centre that will be taken from our local area. 3. Being built on Green Belt land - this proposal does not meet the 'very special circumstances' needed to build on Green Belt land. The development will break up the countryside, will remove the Green Belt 'openness', and would be much better suited to a brownfield site. The harm caused by building this would not be outweighed by any benefits to local people. 4. Making Havering a prime target in the event of a war - I would no longer feel safe living here. 5. Potential and unknown health risks that could be created by living near a data centre.

		Overall, it is simply a completely inappropriate location for a development like this, and must be reconsidered.
205	Individual	I object to this proposal.
206	Individual	This is a terrible idea, no one wants an obnoxious data centre that will cause unnecessary noise pollution in havering. Havering has a major population of pensioners who simply want to live out the rest of their days enjoying the greenery and wildlife havering has to offer. Destroying that for a data centre that doesn't benefit the people in any way is horrible.
207	Individual	I object to this proposal as insufficient time has been allowed for residents in the local area to give full consideration of the impact of this development on local people. I object to the loss of farmland and greenbelt land to the local population. I object to having such a significant development impacting on the local area and when completed it is my view that local people will have little or no say in the running of the enterprise and its ongoing impact on the local population. I object as the electricity demands of the centre will lead to greater vulnerability to electricity supplies to the local population.
208	[redacted]	I object to the Data Centre, it is a threat to our environment and our local residents. The increasing use of AI forces people out of work, the centres use so much fresh water to cool their systems, causing flooding, water bankruptcy and other eco crises.
209	Individual	Hazardous to environment and residents.
210	Individual	Now i have read some of 3000 pages not as many as i would have liked but i can tell you there is something fundamentally wrong with this LDO ,somethings are not quite adding up and as most of the people on LPA have not read this they will not see the stuff is wrong, also this was predetermined as Digital Reef have been paying nation grid uk since 2020 for new substaion so they must have been very sure they were going to get the LDO .In my opinion this king of planning (LDO)should only be used for chairs and tables outside restaurants not on a project like this also i think the green belt deserves FULL PLANNING and nothing less ,you need to read all this properly as you are going to leave this borough in terrible mess .i cannot even believe you could do this to such a beautiful borough TOWN AND COUNTRY ,You had 54% green belt but after this you will have none flood gates will open, i can honestly say HRA you have failed in listening to your residents, you have failed the green belt and fenns because money means more .
211	Individual	I am against this proposal, the reasons being as follows: Destruction of green belt and wildlife habitats Threat of severe flooding for Bulphan village and other low lying local villages No infrastructure to support either construction traffic or subsequent vehicle movement caused by visitors / employees at the data centre Years of disruption to the local area due to construction Huge use of energy and water to power data centre Buildings will not be in keeping with the rural area and will be an eyesore regardless of any proposed measures to mitigate this.
212	Individual	I am opposed to the building of the data centre. It will have a significant negative impact on the surrounding area and upon the living standards of people in the area. It is highly likely to increase traffic, decrease air quality, impact electricity and water consumption, and it's being built on green belt land. Franky, I'm disgusted. Where data centres have been built in US towns, the local population has not only experienced problems with water shortages and power outages, but they've also discovered their own utility bills are getting more expensive, as locals have been covertly expected to pay towards the cost of the data centres running. Can you please confirm that this will not be the case in Havering? The general public simply don't want more data centres. They are being forced upon us by unscrupulous companies with highly invasive agendas. I also understand that the contractors put in place to build what will be Europe's largest data centre have no previous experience in building data centres, and that work to clear the area has begun before the consultation process has concluded - can you please confirm if this correct? If so, it's outrageous.
213	Individual	The impact on the borough's green belt and the surrounding area enormous. Strongly object to farmland and green spaces being swallowed up.
214	Individual	I wish to raise an objection on the construction of East Havering Data Centre, as a resident of Havering these plans seem ill considered and rushed. Building on our green belt should not be allowed this is damaging to the environment for all of us and has severe impacts on the wildlife on those areas. I would also point to the environmental issues around these huge data centres they consume enormous amounts of power which strains local infrastructure along with using water cooling which has also been shown to cause a multitude of problems for the surrounding areas. I urge the council to reconsider these plans and to find an alternative site using the latest technology to ensure these centres have as little impact as possible regardless of cost I think it's important we do not continue to harm our communities and countryside with ever more development in doing so we can ensure a clean and green Havering for years to come.
215	Individual	Strongly disagree with this being built on our green belt.
216	Individual	I'm completely opposed to this as it would cause severe local environmental damage as well as contribute to global environmental issues. It would cause additional traffic, and completely ruin this part of Havering as somewhere people can live and pass through in comfort. These lanes would become a no go area for walkers and cyclists. There will be particle, noise and light pollution. This development would drain power and water resources to an unacceptable level.
217	Individual	I am extremely opposed to the Data Centre being built. It is an obscene idea, unnecessary and a crime against humanity and wildlife. It is simply not necessary to store that much data. Take it out of the cloud! Not only do I not think the location suitable, but also the concept.

218	Individual	To: Havering Council Planning Department Reference: LD00001.26 – East Havering Data Centre Campus (Digital Reef) Subject: Formal Objection to the Proposed Local Development Order (LDO) I am writing to formally object to the proposed Local Development Order for the East Havering Data Centre Campus. I believe this project represents an inappropriate and harmful development that fails to meet the legal requirements for construction on Green Belt land. Please act in the interests of the community you are serving. My objections are based on the following material planning considerations: • Inappropriate Development on Green Belt: The applicant has failed to demonstrate the "Very Special Circumstances" required by the NPPF. The economic benefits do not outweigh the permanent loss of openness in this protected rural area. • Harm to Rural Character: The massive industrial scale of these warehouses is entirely incongruous with the rural character of North Ockendon and the surrounding borough. This represents significant "urban sprawl." • Noise and Light Pollution: The 24/7 operation of high-capacity cooling fans will create a constant low-frequency hum, disrupting the tranquility of the area. Additionally, security lighting will destroy the "dark sky" status of this rural pocket. • Traffic and Infrastructure Strain: The local road network (B186, Fen Lane, and A127 junctions) is unsuitable for the volume of HGVs and operational traffic. This will lead to increased congestion and safety hazards for all residents. • Resource Consumption: I am concerned about the massive water requirements for cooling and the air quality impact from the regular testing of large-scale backup diesel generators. • Procedural Unfairness: The use of a Local Development Order (LDO) bypasses the necessary granular scrutiny of individual planning applications and removes the community's voice in future phases of the project. I urge the Planning Committee to reject this LDO and protect Havering’s Green Belt.
219	Individual	The proposed data centre is on our sacred green belt. And it will be sprawling unsightly and destroy wildlife, the habitats and our enjoyment of the natual countryside. We also dont need the bribe of amother nature centre. We need access to natural countryside which we have already through paths and walkways. The dater centre should be built upwards on a smaller footprint and better built in the old industrialised areas along the Thames where ther is an abundance of water and reasonable amount of power, although i understand not enough. Digital reef want to build on our green belt because it is cheaper. That's why they want it there. They should invet in upwards and not cheap outwards where it affects us. Additionally my research siggestes that smaller modular data centres are favoured more than Mega centres. Digital reef may start off building this and then decide it's not viable as smaller intercinbected modular systems are better. Digital reefs investers may loose some money, but we will have lost our environment by then.
220	Individual	Ref LDO 0001.26 I write in objection to the planned development of East Havering Data Centre. Firstly, I draw attention to the matter that I received your ‘Notice of Public Consultation’ correspondence (dated 6th March), on Friday 13th March, the day after the meeting which was held on the 12th at St Mary Magdalene Church, North Ockendon. This was most disappointing and did not give fair opportunity to attend or for response. Secondly, I wish to convey how devastating for the local community it would be if this project were to go ahead. Site: The rural location of North Ockendon is it’s life blood. Our green belt is so much more than a back drop to those who live here. Many residents are third or fourth generation families where the landscape is valued for its personal and cultural connections and it plays a vital role in their subsistent lifestyle. Those who join this community, often later on in their life, chose to do so because of its unique identity and for the quieter, slower pace of life it offers. The proposed site for development has a well-being value to the land, beyond that of any monetary figure. It delivers social cohesion and historic narratives which will be forever destroyed.

		The flora and fauna is highly respected by the villagers and we co-exist presently with nature in a symbiotic relationship. Biodiversity is thriving in our green belt and we do not want it disrupting nor taking away. We are the voice of nature. The proposal of an Eco park in my opinion is merely green washing. The proposed site for development has already devalued our homes and many residents have indeed found it impossible to sell their property and to many, this their retirement security. This is putting excessive strain on our mental and physical well-being which is already putting unnecessary burden on the NHS. The proposed site is also unacceptable because it is one of three major developments being forced onto a tiny community, all being unleashed at the same time, namely The Lower Thames Crossing, The East Havering Data Centre and The Warely Battery Project. The toxic triangle. Our local roads are not suitable for heavy loads nor heavy traffic use for this project let alone combined with other major projects in the same time frame. This hasn't been given enough thought in my opinion. Poor management of the 'bigger picture' wreaks of a distinct lack of value or respect for the villagers of North Ockendon. This disregard has rendered us powerless. The close proximity of this potential terrorist target Data Centre to our community is a travesty. In my opinion, public consultations have been a mere tick box exercise on the part of the council and this is morally and ethically wrong. I wish to see this project relocated somewhere more suitable where nature will not shoulder the brunt of human folly and where communities will not be bargained.
221	Individual	In response to the LDO proposal for the South Ockendon data centre campus, here are my comments, concerns, observations and questions. I will first list the biggest issues I have found with the proposal, then elaborate point by point and give publicly available data, scientific citations and evidence for each of the problems I find with the proposal. -------- Introduction [redacted]My response should therefore be read as that of a subject matter expert and concerned citizen. Throughout this document, I provide footnotes with references and citations to support my observations with concrete evidence. You can find these towards the end of this document. While there are many issues with the proposal documents, for brevity I will limit my response to the following points, which to me present the biggest flaws in the proposal: 1. The Statement of Reasons appears to be based on wishful thinking and belief in an as yet unproven long-term future demand for more data centres: simply stating repeatedly that demand exists does not turn this into a proven reality, unless you can provide relevant research and publicly available objective data. Objective data, however, appears to be missing from the proposal. 2. The Health Assessment report ignores all the latest studies and research into the effect of infrasound on human health. In fact, the term infrasound is entirely absent from the Environmental Assessment Report. More assessments need to be carried out and the health report needs to be revised to take new scientific evidence into account. 3. The Environmental Assessment Report for water consumption projects an operational water demand equivalent to more than 800 additional households. The report does not provide a solution of how this additional demand will be managed. I can only find expressions of hope that plans by Essex & Suffolk Water to expand provision will actually materialise. Additionally, the question of who will pay for this still hypothetical water supply expansion by Essex & Suffolk Water remains unanswered. ------ 1. A detailed look at the "Statement of Reasons" Point 2.3 claims that "The data market in the UK (i.e. money made from products or services derived from digitised data) is the largest in Europe and globally the UK now sites behind only the US and China in terms of venture capital investment." Observations: Selling citizen's data, which both China and the US can do due to weak or missing local regulation, is unethical and destroys citizen's right to privacy. Comparing oneself to other privacy disrespecting countries, such as the US and China, is not the badge of honour the UK government, and by extension, Havering and this LDO seem to think it is. This is not something we should aim for. The reality is that the public is beginning to wake up to the fact that their data is being sold to the highest bidders and that this feeds ever increasing surveillance mechanisms. The effect is that an increasing number of people are starting to learn about self-hosting, "deGoogled" smartphones and other privacy respecting technology options.

		In addition, a sizeable portion of people are being locked out of the online world they once used to enjoy thanks to the backlash against smartphones at school, screen time restrictions for teens and age verification barriers for adults. This means less growth for online services, especially as a new generation is growing up less tethered to their devices. Point 2.4 claims that "In September 2024, the Government designated UK data centres – the buildings which store much of the data generated in the UK – as 'Critical National Infrastructure'. This means that data housed and processed in UK data centres such as NHS patient records and sensitive financial investment information, is less likely to be compromised during outages, cyber-attacks and adverse weather events." Observations: This is a fallacy that is based on a lack of understanding of cyber security (ref 1). Just because data is housed in the UK, it does not in fact make it more resistant to cyber attacks. There is a distinct difference between physical infrastructure and the software infrastructure the data resides on. If AWS, Microsoft, Oracle or Google vibe-code sloppy software that your data sits on or is processed by, the best data centre in the world is not going to protect you from attacks. - And as vast majority of UK government and corporate software purchasing favours the big US companies as suppliers, the UK remains vulnerable to attacks. A hacker is much more likely to exploit the vulnerabilities in common software infrastructure because the rewards are bigger than they are to go for niche products. Therefore the argument that housing data in the UK makes it somehow more secure is redundant. Point 2.5 claims that "(...) further additional data centre capacity and access to fast, secure and reliable digital connectivity is essential to enabling economic growth and to reap the transformational productivity benefits of digitalisation and the adoption of AI." Observations: This assumption is based on erroneous thinking: AI is more likely to destroy jobs than it is to create them. Who will really benefit from this hypothetical increase in productivity? Certainly not all those workers who will lose their jobs to automation! Over the past 12 months we have seen many large-scale layoffs, particularly in the more skilled tech sector. According to layoffs.fyi (ref 2), a site that tracks job losses, at the time of this response the tech industry has seen over 70,000 job losses so far for 2026 alone. Last year the site tracked 124,201 jobs as redundant, several thousands of those in the UK. A rise in unemployment does not benefit the economy: it destroys it further. Point 2.9 claims that "As the demand for internet-based services such as these increases so does the demand for data centre space, with one type of service, public cloud, currently accounting for more than 75% of all demand in the UK." Observations: This is based on the assumption that digital services will continue to grow as they did during the pandemic. But is this really the case? More and more people are discovering that too much screen time is not healthy. In fact, the UK government has been leading its own campaign to restrict screen time for kids and teenagers. This means a whole new generation learns to live without cloud-based digital entertainment as an option going forward. In addition, the ongoing cost of living crisis and rising prices means that streaming and software subscriptions are increasingly a luxury and as such are the first to be chopped when the family budget no longer adds up. With AI destroying jobs, as we saw above in point 2.5, more households are likely going to cut back on their consumption of digital services rather than increase uptake. Point 3.32 claims that "Policy D11 states that development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects." Observations: This fails to mention the fact that data centres are a military target as we have most recently seen in the current US-Iran war. Putting a data centre in close proximity of civilian housing is therefore irresponsible. Point 3.34 claims that "Policy SI 1 states that development proposals should not lead to further deterioration of existing poor air quality, create new areas that exceed air quality limits, or create unacceptable risk of high exposure to poor air quality. As a minimum, development proposals must be Air Quality Neutral." and point 4.12 states that "The whole of the London Borough of Havering has been declared as an Air Quality Management Area (AQMA) for exceedances of the annual mean NO2 objective and the daily mean PM10 National Air Quality Strategy Objective/2006)11." Observations: The environmental assessment report of the LDO states that air quality around the proposed site is not the best at present. We also know that several US data centres have purchased and installed jet engines to make up for shortages in electricity supplies. Rather than being backup solutions, these power generators have become a permanent feature. (ref 3, 4) The LDO proposal offers no sign of awareness of this becoming a potential issue if power demands of the site or the local area were to increase, nor does it offer solutions or protections for the

		local population if a resident hyperscaler decided to supplement power needs . All it talks about is 'minor short-term impacts' of emergency generators. This is short-sighted and unacceptable. Point 3.61 claims that "Policy 36, Low Carbon Design and Renewable Energy states that the Council will seek to optimise the energy efficiency of buildings and support low carbon and renewable energy developments including energy efficiency improvements to existing buildings. In addition, the Council will require major development to prioritise connection to any existing or planned decentralised energy networks and, where feasible, integrate combined heat and power systems on site." Observations: There is no explanation of what these 'major developments' are, when and where these will take place, how many (if any) have been approved to go ahead or who will fund these. Please provide evidence. Point 12.3 claims that "It is widely accepted that there is a significant and urgent need for additional data centre capacity to ensure that the UK retains its competitive edge in attracting data centre investment and maintaining its leading position in Europe's digital economy." Observations: Other than a broad statement no concrete evidence for this claim is provided. Point 12.9 claims "It is clear that there is a demonstrable need for data centre capacity to serve the London cloud market." Observations: Just like point 12.3, this is an empty claim that is not backed up by citations of evidence. Point 12.14 states that "Resilience is also provided through dedicated connections to existing AZs in Slough and West London, where all of the major operators have a base. The proposed data centre campus is large enough to provide hyperscale capabilities for a number of different operators without compromising latency, increasing its attractiveness to the widest possible market." Observations: This suggests that the proposed data centre is not built with a specific tenant in mind and that no contracts have been negotiated. A CBRE report on data centre take up for Q3 of 2025 states that "Take-up (114MW) fell short of new supply delivered (120MW) in Q3, despite strong demand across Europe. It was the second consecutive quarter that has happened. It is unusual for new supply to exceed take-up in a quarter. However, two new wholesale facilities in London and Paris were delivered in Q2 and Q3, respectively, that have only been partly let. As such, takeup was less than the new capacity that became available." (ref 5) "It is unusual for new supply to exceed take-up in a quarter" says CBRE, and yet it happened for two quarters in a row. This suggests that the picture is perhaps not as rosy as the LDO proposal is making it out to be! Point 12.15 promises that "By 2029 the first data centres at East Havering would be operational and utility connections (power, fibre and water) would be in place. " Observations: Many data centres are proposed, but construction is either lagging behind or not happening at all, as reported recently by The Guardian who investigated the site at Loughton. (ref 6) Investigative journalist Ed Zitron has published many detailed analyses on data centre demand that reveal the vast chasm that lies between PR announcements in the media and actual reality. (ref 7 8 9) He also recently appeared on the Tech Report podcast (ref 10) where he had this to say on the topic: "So absorption is data centers that come online and produce revenue. And CBRE they said about 2 1/2 giga watts worth got absorbed in 2025 in the eight largest markets which account for most data center capacity. I went around looking for the rest of the markets. You've got growing markets like southern Virginia, Columbus, Ohio. And what's funny is when I looked it up, lots of people were like, "Well, if you don't include those, it's not the full amount." Except I could find very little actual stuff that got built there. Tons of announced stuff. There's, if you count all of the announced data centers, you could cover the entire country in future laser tag arenas. It's ridiculous. Absorption is the only number that matters, though, because when you hear under construction, under construction can mean literally everything from a single steel beam to a near complete building. And these companies, they like to mislead people. You saw it with Stargate Abalene in particular. They'll say it's come online. When they say it's come online, click through to the article and make sure they're not just talking about one bit of it coming online cuz that's always the case. So absorption is the only real measure of AI buildout. If you hear an announcement of a data center, think two or three or four years in the future because I can't find a single data center project announced last year or even in 2024 that appears to have been finished." None of the big GenAI companies are profitable - in fact, they and their partners are several hundred billion dollars worth in debt. (ref 11, 12) It is also highly unlikely they ever will be profitable because the expenses for infrastructure versus income from paying customers does simply not add up. We are already seeing signs of the big tech companies scaling down their demand expectations (ref 13, 14, 15) as take up of AI remains sluggish. (ref 16)

		Meanwhile, survey (ref 17) after survey (ref 18) shows that the public, both in the US and the UK, mistrusts AI, while the EU is banking increasingly on smaller scale open-source solutions for their public infrastructure.(ref 19, 20) All this means that there is currently a realistic chance that a lot of AI firms will not survive the next couple of years, and the big hyperscalers will downsize their demand substantially as a result. What does that mean for data centres? As Ed Zitron puts it: “future laser tag arenas”. Point 12.60 claims that "It is irrefutable that there is an urgent and overwhelming need for data centre floorspace. As noted in the National Data Strategy, boosting the resilience of the sector will help the country top the global leagues for data security and support the UK government in its mission of achieving sustained economic growth." Observations: As stated for points 12.2 and 12.5 , these claims lack evidence, are built on a lack of understanding of how cyber security actually works and thus are dubious at best. Point 12.61 claims that "The proposed development will make a significant contribution to the need for data centres serving the London cloud region and will result in an investment of £2.26 billion in the UK economy and £1.87 billion in the Havering economy." Observations: Again, I cannot find evidence for this claim. Where is this money going to come from? What are the sources? Have contracts been signed for any of this? Please provide concrete evidence for the claim. Point 12.62 claims that "The s106 also requires a contribution of £50k per annum for the duration of the LDO for the creation of employment within the Borough including through the jobs brokerage service (Havering Works). It also includes a best endeavours requirement to secure local procurement." Observations: £50k? That is the average cost for one worker in the low to average income bracket. Please provide further details on how this money will be spent and who funds the rest of the 'jobs brokerage service'. Point 12.81 states that "The operational phase of the proposed development would create highly productive, permanent employment across the Havering economy. OE estimate that the proposed development could generate £281 million of GVA and create or sustain 620 jobs across Havering once fully operational in 2045, including 350 on average highly-productive and well-remunerated jobs at the proposed development site itself. The operational phase would equate to a 2.3% increase in Havering’s total GVA, and a 0.5% uplift to employment, relative to the baseline forecast for the local economy And point 12.82 states that "The operational phase would create employment opportunities for residents of varying skill levels. It is estimated that almost a third of employment would be in elementary trades, while a majority of jobs would not require degree-level qualifications." Observations: So rather than creating high quality jobs for the area, the kind of jobs we are talking about are mostly low income jobs, such as cleaners, security guards and cafe workers. This does not appear to provide a great deal of benefit or an uplift in socioeconomic terms for the local population. I also note that a) there is a lack of clarity over whether these jobs will be created or sustained and b) a time scale of 2045 for (maybe?) 350 well-remunerated jobs is laughable, given the size of the proposed campus and upheaval caused to the local population. Besides, a definition of 'well-remunerated' is absent. The LDO may well be referring to cleaning personnel that is paid slightly above minimum wage. More clarity on this is required. 2. The Health Assessment Report I cannot find any mention of the word infrasound in the entire proposal and its many reports. There are lots of entries in the Environment Report that deal with noise pollution that is within the human audible range, such as construction and traffic noise, but nothing pertaining to noise that is below 20 Hertz, i.e. inaudible by humans. Infrasound is particularly problematic as it is less easily absorbed by barriers and the environment and therefore can travel for miles. A 2011 study of infrasound created by wind farms found that noise from the turbines could be measured as far as 11 km from the origin point of the noise. (ref 21) I consulted official UK government guidelines about infrasound pollution. (ref 22), but sadly found the research document to be more than 15 years old, with many research citations 20 years or older. In short, the government's own guidelines on the health effects of infrasound were written before data centres became as prolific as they are today, and a major update to these guidelines

		is essential to protect the public from harm. In the absence of useful government guidelines, I did some research myself. Here is what I found: A review of current research into how infrasound affects human health by Liu Xia et al (American Journal of Life Sciences, ref 23) found detrimental effects of frequencies below 20 Hertz that "can impact the CNS through direct and indirect mechanisms, such as damaging neuronal membranes, interfering with neurotransmitter release, altering intracellular signaling, and compromising the blood-brain barrier. These effects may cause neuronal dysfunction, neurotransmitter imbalances, increased oxidative stress, and inflammation, affecting mood, cognition, and memory.(...) In summary, current research reveals that infrasound causes damage to the central nervous system by affecting various aspects, including cellular signal transduction, neurotransmitter balance, oxidative stress, and inflammation." Secondly, audio researcher Benn Jordan recently went on a tour of US data centre sites, recorded their inaudible for humans noise pollution and found that some data centres produced louder noise than America's largest oil mining site in the Permian Basin, West Texas. (ref 24) For example, at 7mins 54sec into the video, Jordan explains one of the sample recordings he took near a data centre: "Another sample I took was from a park near an elementary school in residential area about a mile away. This in particular is a great example of how higher frequency sounds are dampened by distance much more than lower frequency or infrasonic ones. If this video is playing through a sound system with subwoofers or even if you're wearing some good headphones, you will very quickly realize how frankly uninhabitable this noise makes the entire neighborhood. This rumbling is no good and would make your life utterly miserable. And then this rumble down here is happening at an amplitude that's loud enough to shake the frame of your house." While Jordan's research is still ongoing, it is already clear from the interviews and audio recordings documented in his video that infrasound is an important aspect to data centre sites that has the potential to negatively impact on public health, and as such it needs to be taken seriously. (ref 25) It is important to stress that just because a sound does not sit within the human hearing range it does not mean that it is harmless. Since the environmental health report only focuses on audible noise, further impact analyses for the LDO proposal are desperately needed before this project is given the go ahead. Another concern for public health is the heat dissipation from the proposed site. I understand from the documentation that there are plans for an area heating system powered by the data centre. This begs the question, however, what will happen to the heat during summer months when many of us crave air conditioning, rather than additional heating. I did not see this issue addressed in the reports. This month The Register reported on new research from the University of Cambridge that shows increased temperatures in areas surrounding data centres (ref 26). Given these new findings, how will you protect anyone living within a 10km radius of the site from the additional risk of heat related health problems during hot summer days? 3. Water Consumption Essex is the driest county in England with below average rainfall. Currently, it takes very little to trigger hosepipe bans. Meanwhile, the environmental report for water consumption projects the data centre's operational water demand to be equivalent to more than 800 additional households. The report does not provide a solution of how this additional demand will be managed other than the hope that plans by Essex & Suffolk Water to expand provision will actually materialise. Additionally, the question of who will pay for this additional still hypothetical water supply expansion by Essex & Suffolk Water remains unanswered by the report. Questions: 1. How will you ensure that this additional load on the local water supply does not lead to even further water shortages during periods of drought? 2. Who will pay for the planned expansion of supply by Essex & Suffolk water and when will this take place? 3. How will you ensure that water prices remain affordable for households? 4. What guarantees are offered to safeguard human supplies in the event of prolonged droughts? 5. Will residents be given priority access to water over the data centre if we arrived at critically low levels of potable water? --- Summary The proposal relies on unproven hype and offers little in the way of evidence that data centre demand will keep growing over the coming years. In fact, evidence is mounting that the tech sector, and AI demand in particular, will be slowing down as individuals and small businesses are more likely to run open source solutions in order to save subscription costs. This trend is particularly strong in the EU where public services and businesses are increasingly opting for smaller, more bespoke open-source solutions. In addition, as AI technology is optimised to run on fewer

resources, we can expect a downturn in data centre demand over the coming years.

Both the Health and the Environmental reports are flawed and need revisions as they do not take into account more recent medical research into the detrimental effects of infrasound.

Footnotes / References

1) Side note: If the people who compiled this proposal do not even grasp such fundamentals, then it is almost safe to assume that the entire proposal is built on quicksand and make believe. A cynic might say that the LDO proposal relies heavily on the lack of technical knowledge in the general population and their naive acceptance of broad, blatantly wrong statements.
2) https://layoffs.fyi, accessed 5th April 2026
3) https://www.ft.com/content/8deb1518-b650-4a21-b7d1-3e6180560056?syn-25a6b1a6=1
4) https://spectrum.ieee.org/ai-data-centers
5) https://mediaassets.cbre.com/-/media/project/cbre/shared-site/insights/figures/European-Data-Centres-Figures-Q3-2025/European-Data-Centres-Figures-Q3-2025
6) https://www.theguardian.com/technology/2026/mar/09/from-press-release-to-scrap-metal-site-the-essex-supercomputer-thats-still-a-scaffolding-yard
7) https://www.wheresyoured.at/big-tech-2tr/
8) https://www.wheresyoured.at/oracle-openai/
9) https://www.wheresyoured.at/why-are-we-still-doing-this/#the-data-center-debt-financial-crisis-has-now-pulled-in-insurance-and-pension-funds-using-the-markets%E2%80%99-ai-psychosis-to-make-them-ignore-junk-ratings
10) Tech Report “The AI boom is a lie: Fake data centres and unused GPUs | Ed Zitron”, 27 March 2026 https://youtu.be/nxUEOdC4VzU
11) https://markets.financialcontent.com/stocks/article/marketminute-2026-2-12-oracles-300-billion-gamble-inside-the-45gw-stargate-deal-redefining-the-ai-arms-race
12) https://www.irishtimes.com/business/2025/11/28/openai-partners-amass-100bn-debt-pile-to-fund-its-ambitions/
13) https://www.reuters.com/business/oracle-openai-end-plans-expand-texas-data-center-site-bloomberg-news-reports-2026-03-06/
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16) https://www.statista.com/statistics/1602945/market-size-change-in-the-ai-market-worldwide/
17) https://www.pewresearch.org/short-reads/2026/03/12/key-findings-about-how-americans-view-artificial-intelligence
18) https://www.ipsos.com/en-uk/what-uk-thinks-about-ai
19) https://www.euronews.com/next/2026/01/27/france-to-ditch-us-platforms-microsoft-teams-zoom-for-sovereign-platform-amid-security-con
20) https://www.theregister.com/2025/10/15/schleswig_holstein_open_source/
21) https://pubs.geoscienceworld.org/ssa/bssa/article-abstract/101/2/568/349448/Seismic-Noise-by-Wind-Farms-A-Case-Study-from-the
22) https://www.gov.uk/government/publications/ultrasound-and-infrasound-health-effects-from-exposure
23) https://sciencepublishinggroup.com/article/10.11648/j.ajls.20251301.12
24) Benn Jordan: "Datacenters Behaving Like Acoustic Weapons", published 18th Feb 2026 - https://youtu.be/_bP80DEAbuo
25) Please refer to the citations section below for more research on this topic
26) https://www.theregister.com/2026/04/01/ai_datacenter_heat_islands/

Citations and further reading

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222	Individual	I strongly object to this proposal for a data centre and ecology park. We have a disappearing amount of green space and already have the new Dartford crossing adding noise pollution and disruption in the years ahead. The impact of an AI facility in terms of power and water requirements is unacceptable in a highly populated area. I am certain the decision is based on greed and profit for those behind this land grab. I feel sure there are better sites away from populated areas. I am particularly concerned about the impact on the water supply and potential contamination. We already have a high concentration in this area of rubbish tips along the Thames and feel that we have enough environmental challenges without adding more.
223	Green Party	Natural landscape cannot be replaced by investing elsewhere. And the destruction extends beyond the site itself with the water and power requirements. There are no benefits to London and massive problems to the local area.
224	Individual	I am writing to object to the application LDO0001.26 for the following reasons. The application is contrary to Havering's Green Belt policy and will remove 218.8 hectares from the Green Belt. This will be a blight on the landscape in a predominantly agricultural area. The development also falls within a Countryside Conservation Area and Thames Chase Community Forest and will have a detrimental effect on both. It will also destroy and displace the local ecosystems. The development site is in an area of low public transport accessibility levels and the number of road trips both during construction and operation of the site will have a huge impact on the local road network. Both Ockendon Road and Fen Lane are single lane roads. Fen Lane in particular is narrow and dangerous currently for cars passing each other, let alone construction vehicles. The development will have a detrimental effect on air quality during construction creating dust and particulates, and during operation. Noise and vibration will also be an issue with both construction noise and electrical noise during operation which will negatively impact local residents and businesses. The development will have a huge negative impact for successful business Top Meadow Golf Club which provides an important recreational resource as well as operating as a restaurant and function venue. Current views from the restaurant will be destroyed and access will be significantly affected. The data centre will have a huge drain on the electricity network and on local water resources which could affect surrounding residents and businesses. I would urge you to seriously consider the negative impacts of this development, rather than just thinking about the financial rewards as once the data centre is built, the damage to the surrounding area cannot be reversed.
225	Individual	I would like to formally object against the proposed Local Development Order for the East Havering Data Centre Campus. I feel this plan represents an inappropriate and harmful development that fails to meet the legal requirements for construction on Green Belt land. My objections are based on the following material planning considerations: • Inappropriate Development on Green Belt: The applicant has failed to demonstrate the "Very Special Circumstances" required by the NPPF. I strongly feel the economic benefits do not outweigh the permanent loss of openness in this protected rural area. • Harm to Rural Character: The overbearing industrial scale of these warehouses is entirely unsuitable to the rural character of North Ockendon and the surrounding area. I believe this would most definitely represent significant urban sprawl.

		• Noise and Light Pollution: The non stop operation of high-capacity cooling fans would create a constant low-frequency hum, disrupting the tranquility of the area. Additionally, security lighting will materially impact against the "dark sky" status of this rural pocket. • Traffic and Infrastructure Strain: The local road network (B186, Fen Lane, and A127 junctions) is unsuitable for the volume of HGVs and operational traffic that would inevitably be required for this development . This would certainly lead to more congestion and safety risks for all residents. • Resource Consumption: I am very concerned about the enormous water requirements for cooling and the air quality impact from the regular testing of large-scale backup diesel generators. • Procedural Unfairness: The use of a Local Development Order (LDO) bypasses the necessary granular scrutiny of individual planning applications and removes the community's voice in future phases of the project. I strongly urge the Planning Committee to reject this LDO and protect and safeguard Havering's Green Belt.
226	Individual	I am writing to register my strong and formal objections to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: 1. Unacceptable Environmental Impact and Noise Pollution. The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. 2. Strain on Infrastructure and Energy Grid. Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. 3. Character of the Area and Green Belt/Land Use. Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. 4. Lack of Local Benefit and Use of LDO. It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. 5. Health and Visual Impact. The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. Conclusion. I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate.

		I request that my objection be formally recorded and considered as part of the consultation documentation.
227	Individual	I am writing to register my strong and formal objections to the proposed East Havering Data Centre Campus Local Development Order (LDO), reference LDO0001.26. As a resident of Upminster, I am directly impacted by this proposal. While I acknowledge the national need for digital infrastructure, the scale, location, and method of delivery of this specific project represent an unacceptable overdevelopment that will cause significant and permanent harm to our community, the local environment, and existing infrastructure. My objections are based on the following critical grounds: 1. Unacceptable Environmental Impact and Noise Pollution. The proposed site is wholly unsuitable for the scale of industrial machinery required. Data centres operate 24 hours a day, 365 days a year, requiring constant, heavy-duty cooling systems (Air Handling Units/AHU) and backup diesel generators. The constant, low-frequency hum and intermittent high-volume noise from these facilities will destroy the current amenity enjoyed by residents in Hornchurch and the surrounding areas. Unlike commercial or industrial sites that operate during business hours, this development offers no respite from noise pollution, constituting a statutory nuisance that will devalue properties and harm residents' quality of life. 2. Strain on Infrastructure and Energy Grid. Data centres are among the most energy-intensive facilities in existence. The London Borough of Havering, including Hornchurch, is already facing challenges regarding energy capacity, water supply, and traffic congestion. This campus will consume a vast amount of electricity, placing unsustainable strain on the national grid and local substations. Furthermore, the reliance on massive backup diesel generators—which are required to run regularly for testing and potentially during peak demand—will introduce harmful particulate matter (PM2.5) and nitrogen dioxide into our air, directly contravening the council's climate emergency commitments. 3. Character of the Area and Green Belt/Land Use. Hornchurch and the surrounding area are valued for their suburban character and proximity to green spaces. If this proposal involves Green Belt land, it must be subject to the "very special circumstances" test. I fail to see how a commercial industrial campus of this magnitude meets that threshold. This is not "critical national infrastructure" in the sense of a hospital or power plant; it is a private commercial venture that should be located on existing industrial estates or decommissioned power station sites, not on the edge of a residential suburb. 4. Lack of Local Benefit and Use of LDO. It is deeply concerning that this project is being pushed through via a Local Development Order (LDO) rather than a standard planning application. The use of an LDO effectively removes the rigorous scrutiny and negotiation that normally comes with a Section 106 agreement. By bypassing the standard planning process, the council risks losing the ability to secure vital Community Infrastructure Levy (CIL) funds or binding conditions that mitigate the impact on local roads, the NHS, and schools in Hornchurch. This development offers little to no tangible benefit to the existing residents of Havering, only industrial blight. 5. Health and Visual Impact. The constant light pollution from security lighting and the sheer physical massing of these warehouse-like structures will create a visual scar on the landscape. More importantly, the cumulative effect of noise, light, and air pollution from diesel generators poses a direct risk to the physical and mental health of residents living within proximity. Conclusion. I urge the council to reject this LDO in its current form. This proposal represents a gross overdevelopment that prioritises external commercial interests over the statutory duty to protect the health, wellbeing, and environmental quality of Havering's existing residents. If the council is determined to pursue such a facility, it must be subject to a full planning application process—not an LDO—to ensure proper scrutiny, mitigation, and accountability to the electorate. I request that my objection be formally recorded and considered as part of the consultation documentation.
228	Individual	I wish to state my objection to the building of a Datacentre on the site at North Ockendon. Firstly there has been insufficient time in which to gather evidence both for and against this proposal. Large developments akin to this one should be given due time for consideration not rushed through at speed as once mistakes are made there is no going back. Country green belt is not to be given lightly without making sure all aspects are covered and this development has many holes in it. The building of this datacentre will bring into focus not just the immediate area of destruction in North Ockendon, which is itself a conservation area, but it will affect both West Horndon and Bulphan. Who can tell what will happen to the excess water used on the site and what repercussions there might be for Fenland. Recent high rainfalls in the area have caused red warnings to be flagged up for flooding in the immediate vicinity of The Mardyke. Water emitted from the site will only make this prospect more likely. What of the wild life within the area. Who can say that the animals will not be disturbed by the ongoing 20 year upheaval.

		Mentioning upheaval, what of the traffic problem that the building is going to cause to local traffic and the village of North Ockendon? The lorry traffic on small roads for 20 year is going to be devastating and untenable for local people. [redacted], the conditions of the roads are poor and heavily trafficked, this will get worse as the lorries break up the surfaces. The solar farm built in Fen lane started 5 byearsa ago and the road has still to be repaired, will this project continue in the same way? I strongly belief that with so many proposals for data centres of this kind springing up in many areas around London that not sufficient investigation has been done to determine what is required. Not all the building is necessary and not where it might, in the future, endanger lives should we as a nation be dragged into hostilities. Datacentres will be a prime target for any enemy, another reason not to build one close to any villages, town or like. Please give more thought and time to this proposal that the local people can have more of a say in it and not be overlooked in the final decision. Thank you
229	Individual	I object to the building of this massive, energy and water hungry facility on greenbelt land at a time when there is a climate and biodiversity emergency in this country. If it needs to be built (which is questionable) it should be built on a brownfield site. It should not be steamrollered through against the wishes of the people who live in Havering because the council is financial trouble and needs an income stream other than that the pitiful grant that is given by central government. It should also not be forced through by central government if the consultation recommends that it should not be built.
230	Individual	Are the councillors/planners prepared to have potential deaths on their hands/conscious, or willing to be held personally liable for any health impacts created by the effects of this Data Centre against them directly. When this has already been proven and well documented in the U.S. and the many court cases that are ongoing or have been held.Therefore you won't be able to plead that you didn't know when it goes to trial, no NDA, is going to help you there?
231	Individual	I don't want the construction of a Data Centre Campus in this area. Some of the reasons are grounds noise, air and heat pollution, harm to wildlife and ecosystems.
232	Individual	Green belt being sold to highest bidder. Control of assets such as AI being consolidated by those who already control all assets.Besides the terrible environmental fallout - without a stake in these and other assets, your children will never own a house, and will die due to unaffordable healthcare. Water companies will continue to sell contaminated water to you at higher and higher costs. Anyone who is for this destruction of local natural ecosystems is at best short sighted, more likely completely apathetic to anyone other than themselves. Is your councillor who supports this making money from it?
233	Individual	I object to this on the grounds that it is not a suitable development for the area. The water usage, heat, noise and light pollution from such a large development will cause irreparable damage to Havering's green belt. All, it seems, all for a hand full of silver.
234	Individual	I object to this proposal for several reasons - Data centers require massive amounts of power, which can raise local electricity rates and strain regional energy grids increasing our reliance on fossil fuels. - they consume vast quantities of water to keep servers cool, which will invariably affect my water supply, given my relative proximity to this build - Cooling systems create a 24/7 drone that will disturb nearby residents. They will also run backup diesel generators that degrade local air quality. - I am very concerned about the loss of green belt - given the LTC is now going ahead, putting this data centre right alongside that build will mean misery for Upminster for generations. It will destroy our community life and our attraction as a place to live and settle due to years of disruptive building work and Upminster ultimately being swallowed up by surrounding motorways and builds such as this. - While constructing data centers provides temporary jobs, they employ few people permanently so there is no long term economic benefit for Upminster Data centres benefit foreign tech firms rather than local communities.
235	Individual	I object to the building of the data centre
236	Individual	We don't need this data centre, it will be bad for the environment and the local ecology
237	National Grid	The London Borough of Havering Consultation on the East Havering Data Centre Campus Draft Local Development Order ("LDO") Representation from National Grid Electricity Transmission plc ("NGET") Dear Sir / Madam, NGET owns, maintains, and operates the electricity transmission network throughout England and Wales. Within the vicinity of North Ockendon, NGET operate the Warley Substation and are due to take forward the promotion of expanded electricity substation infrastructure in vicinity of the LDO proposals. NGET welcomes the opportunity to comment on the draft LDO for proposed East Havering Data Centre Campus, which is in the vicinity of its Warley site, as well as its existing infrastructure regarding the ZB 275kV overhead line that traverses the site. NGET makes no comment on the merits of the proposal and limits this representation purely to matters of substance in the consultation documents.

		We refer to the following draft LDO documents on which we limit our comments: 1. Draft Local Development Order Drawings We have reviewed Appendix 1: LDO Site Boundary Plan and Appendix 2: LDO Plans 1-6. We are concerned that the area previously earmarked purely for cable easements is labelled inconsistently (or not at all) across the suite of plans. We request clear and consistent identification of this area throughout the entire suite of LDO plans to avoid ambiguity. 2. Design Code NGET owns and operates overhead line assets within the LDO boundary, being the ZB 275kV overhead line, which contain the two Tilbury – Warley circuits, and pylons ZB038-040. Paragraphs 1Q.2 and 1Q.3 of the Design Code document set out the safeguards to be secured for works authorized by the LDO which will take place in proximity to NGET's apparatus. We consider the current explanation to be insufficient in setting out the nature and extent of the protections that should apply, particularly in ensuring that existing assets as adequately protected and to ensure compliance with the relevant safety standards. NGET invites discussion by the Local Planning Authority to agree the appropriate level of detail regarding safeguards for its apparatus, so that these can be robustly and accurately incorporated into the Design Code. 3. Green Belt Assessment Report and Statement of Reasons conclusions on Green Belt The Council's Green Belt Assessment concludes that the land on which the proposed data centre campus would be developed make a very strong contribution to Green Belt purposes A (checking unrestricted sprawl of large built-up areas) and C (safeguarding the countryside from encroachment) and a moderate contribution to Green Belt purpose B (preventing neighbouring towns merging into one another). As such it concludes there is deemed to be a Very Strong impact on the local Green Belt. On that basis, the Council can conclude in the Statement of Reasons that the suite of mitigation to be secured in the proposed 106 agreement for the LDO is justified and meets the required planning obligation policy tests. NGET is surprised by the conclusions drawn in the Councill's Green Belt Assessment as to the level of beneficial contribution to the five purposes of the Green Belt provided by the LDO land and does not support the conclusions drawn by the Council's instructed consultants. NGET observe that the Council's Green Belt Assessment states that the "higher, western part of the site is to remain open and undeveloped, other than for the purposes of strategic cycle and pedestrian routes……the northwestern part of the site will contain electricity cables connecting the development to Warley substation. The land will remain in its current use" (see page 23). NGET would like to state that this is incorrect as NGET intends to construct a new 400kV substation in this area, therefore the land will not remain in its current use. This development is referenced in ES Chapter 16 (Cumulative Effects), Appendix 5.5 (Cumulative Schemes). 4. Power Report NGET are generally content with the narrative in this Report. However, NGET do however wish to underscore that Table 4.1 contains the Noveus summary of GSP status, which has not been verified by NGET. 5. Section 106 Heads of Terms We note that that the Ecology Area is defined as all areas outside of the Build Zones. However, this does not accurately reflect the white land assigned for power connections to nearby electricity substation infrastructure. The final heads of terms and any completed Section 106 agreement should accurately describe and accommodate the specific purpose in the LDO of this area. We note that same cable easement area also overlaps with the area assigned under the heads of terms to skylark mitigation. However, in that regard, we would be concerned that these purposes are inconsistent. Whilst the heads of terms reference such other "alternative suitable location," we would query whether that should be the default preference. It would be unfortunate if skylark mitigation interfered with the delivery of critical electricity transmission and distribution infrastructure on which the data centre proposals are ultimately reliant. 6. Statement of Reasons

		Paragraph 4.9 refers to the environmental context. NGET notes that the description of the power lines crossing the site is incorrect. The overhead line that traverses the site in a northwest – southeast direction is the NGET ZB 275kV overhead line. The other overhead line that traverses the site in an east-west direction is a UK Power Networks overhead line. Conclusion NGET asks that the Council address the points raised in the above comments in the final form LDO to be sent to the Secretary of State. They should be addressed to ensure the LDO operates effectively and provides the necessary clarity for all parties. We would be pleased to engage further with the Council to discuss any of the points raised in this response.
238	Individual	I object to the proposal for a large data centre in South Ockendon for the following reasons Detrimental effect on Green Belt land This proposed development is huge and sets a very serious precedent about building on the Green Belt. The essence of the Green Belt is openness but this development contains 12 or more large buildings up to 21m high. This development is not "exceptional" in that it would require normal protections to be removed. Reduction on Agricultural Land Allied to the development on green belt land this site in currently agricultural. II believe it is essential to preserve agricultural land to ensure food security for our country. This is a very large site which should not be removed from essential food production Use of scarce water and electricity resources This site will require massive water and power resources (electricity) to allow its operations. The proposed develoment will have a very adverse effect of carbon neutral policies and wil adversely affect both climate change policy and water sercurity and supply
239	Individual	When this technology is redundant in a few years will it be removed and trees replanted!? I don't think so!! This must stop. Our green space must be protected for future generations, we are making exceptions all the time, must have more houses/ Gigantic data centre's etc, we owe it to our children and their children to protect green space. A huge blot on the landscape, greedy politicians trying to bring in more cash instead of managing better! Our green space is vital, it should not be sold off to the highest bidder!
240	Top Meadow Golf Club	I believe [redacted] have voiced most of the villages concerns but we have a couple of our own. [redacted] visited Top Meadow Golf Club as a local business that was highly affected by the proposed site. Top Meadow runs the full length of Fen Lane opposite the Data Center and the views will be massively affected by it. We have many weddings which enjoy the views and peace & quiet along with Golfers, restaurant diners and hotel guests and my fear is that this has not been considered in the reports presented. We are fearful that this will affect our business in a huge way financially and in the relax factor which we offer our customers. Road closures are another massive factor in the running of our business. Some contractors are happy to carry out the work under a traffic light system and others like to work under a road closure as it is cheaper and easier for them to work like this. Even though the traffic light system still affects us the road closure is a complete nightmare as the diversion is nearly 10 miles. Is there any way that this could be added in to the construction rules that traffic lights must be used instead of road closures. Most of our business comes from the Upminster /South Ockendon end of Fen Lane, and also from the Upminster Crematorium for funeral receptions, and the diversion stops them booking. I would appreciate you looking at this in the proposed LDO.
241	Individual	I support the development ONLY IF: It delivers the 1,200+ promised permanent jobs to local Havering residents. The 113-hectare Ecology Park is delivered as promised to offset the use of Green Belt land. The data centre operates on 100% renewable energy with minimal noise and traffic disruption to North Ockendon and the surrounding areas.
242	Individual	I oppose the data centre, I don't wish any green belt land being taken for use of a data centre it's bad enough that other areas have been taken let alone this
243	Individual	On the positives. Data centres are unfortunately an essential - particularly with regard to data sovereignty. I work in large insurance and brokerage companies in the city, working closely with the technology and infrastructure parts of the business. Where our data is stored has been an important part of regulated business for the past 10 years. With events taking place around the world this has become evermore important for the running of these international businesses. Therefore the opportunity to protect the future of the industries in which I operate (and thousands more do

		too) - is only a good thing. I think the consideration that has gone into the design of this particular data centre is quite amazing. From the colouration/outside design of the data centres themselves to help break up the look of them - to the work that has gone into things like traffic management, ecology investment and even choice of piling and operating hours on site. Without doubt there has been a significant amount of effort to design possibly one of the most considered data centres ever. However, a few requests please, [redacted]. Comms. Please can you have a think about a regular and as accurate as possible comms channel please. Especially around road closures. Maybe a "post only no reply" WhatsApp group. Helpful to know when you can't access parts of Fen Lane. The greenhouse has grown significantly from the initial vertical growing house suggestion, and the location has been moved to adjacent to our property. Whilst I fully support that the greenhouse needs to be viable as a business and therefore needs to be a minimum size. Where possible, please can we reduce the likely impacts. - Can the whole of Block H be moved further away from [redacted] boundary towards the mardyke or where it was originally proposed up towards the west of the site? Both the greenhouse and visitors centre. Both are going to create a degree of noise impact, so anything that can be done to mitigate this would be appreciated. - In the event the location can't be changed, please can consideration be given to: - Locating the noisy end of the block to the east side of the site. That way there will be less noise impact on our property I think? - Light impact/pollution. We are fortunate to enjoy no nearby buildings and I'm expecting Block H will need to be well lit for security/health and safety. So again, please can this be mitigated for our property. - Can a LOT of planting be put in - to screen the future buildings. If it were possible, would be great to plant them in year 1 so that benefit of the screening is achieved sooner in the build process (which will help as I think block H comes later in the build plans?). Obviously native species! - Can we stipulate electric vehicles on site where possible to limit pollution and noise impact? - For awareness, we will have horses adjacent to the proposed block H - so please can this be considered too (ie loud noises tends to create stress for horses, resulting in sporadic galloping and potential injury). - The bridleway/footpath currently passes very close to the east boundary [redacted]. The further that path can be moved from [redacted] boundary the better please. Mainly to reduce the number of trespassers and enable more planting to screen the access that would be now possible by visitors to the ecology park.
244	Individual	I believe this will be a great opportunity not only in terms for the Havering residents but also for UK as a whole. This will bring in a lot of jobs for the region, increase skills with the workforce and make London even more stronger in comparison to other competing cities like Dubai at attracting investment.
245	[redacted]	I'm writing on behalf of [redacted] is deeply concerned at the scale of concerns raised by experts and residents who have contacted [redacted] about the scheme, particularly in relation to: - the minimal length of the consultation process; - the LDO proposal's contravention of NPPF green belt policies; - the LDO proposal's failure to demonstrate very special circumstances required for green belt development, and a lack of evidence around need, alternatives, benefits and sustainability; - the LDO proposal's range of environmental harm (including biodiversity and long-term sustainability of development and infrastructure) and lack of appropriate mitigation.
246	[redacted]	This is massive overbearing plan with the destruction of green belt land that's once it's gone, doesn't matter how many landscaping ideas they implement won't bring it back, along with the Lower Thames Crossing running right by it, all the extra power & water needed to run such a massive unsesary project,
247	Individual	I have concerns about loss of greenbelt, heavy use of water required for cooling and heat being pumped out. I also feel very sorry for those houses having ti look at it
248	Individual	Please do not share my personal details - name, addess and email address. I strongly object to the above proposal for the reasons set out below and request that the local planning authority gives these matters significant weight in its determination. 1) Electricity demand and network resilience: Data centres are inherently energy-intensive. The proposed development would place substantial additional demand on the local electricity network and could require significant reinforcement works. There is a clear risk of reduced network resilience for existing customers, particularly given recent local power interruptions. 2) Water resources and cooling requirements: Large-scale data centre operations can require significant water inputs for cooling. This demand may place additional pressure on water resources and associated infrastructure, particularly during periods of drought or restriction, with potential implications for residents and the local environment.

		3) Air quality, back-up generation and climate impacts: Data centres commonly rely on back-up generators, often diesel-fuelled, with potential emissions of nitrogen oxides and particulate matter. The frequency, duration and testing regime for such plant must be fully assessed to ensure no adverse effects on local air quality. In addition, the development's operational energy demand has material climate implications where electricity supply is not demonstrably additional and renewable. 4) Socio-economic benefits: Notwithstanding the scale of the proposal, operational data centres typically generate relatively limited long-term employment when compared with the magnitude of land-take and infrastructure impacts. The applicant has not demonstrated that the claimed economic benefits outweigh the identified harms. 5) Noise and light impacts: A 24-hour operation with extensive cooling plant, fans and periodic generator testing is likely to give rise to persistent noise, tonal hum and intermittent peaks. The scale of external lighting required for operational and security purposes also risks material light spill, with consequential impacts on residential amenity and nocturnal wildlife. 6) Waste management (including e-waste): Data centres can generate substantial quantities of electronic waste due to rapid equipment replacement cycles. The application should demonstrate robust, auditable arrangements for the storage, transport, recycling and disposal of e-waste and any hazardous components. 7) Principle of development in the Green Belt and harm to character: The proposal represents a substantial industrial-scale development within the Green Belt and in the setting of the local conservation area. By reason of its scale, massing and associated infrastructure, it would fundamentally alter the rural character of North Ockendon. The applicant has not demonstrated the very special circumstances required to justify inappropriate development in the Green Belt, nor that harm to openness and character would be clearly outweighed by other considerations. 8) Biodiversity and protected species: The development would entail extensive groundworks and may require the removal or severance of hedgerows and other habitat features, leading to habitat loss, disturbance and fragmentation. This raises material concerns for local biodiversity and for protected species reported in the area (including badgers and great crested newts). The applicant must demonstrate full compliance with relevant wildlife legislation and provide clear, evidence-based avoidance, mitigation and (where necessary) compensation measures, together with secured long-term management and monitoring proposals. This should include explicit provisions to avoid unlawful disturbance of nesting birds (including migratory species) during the breeding season (typically spring to late summer), noting that it is an offence to disturb, damage or destroy an active nest. 9) Construction impacts: The construction phase is likely to be prolonged and would bring significant adverse effects, including dust, mud, noise, vibration and additional emissions from heavy vehicles and machinery. These impacts would materially affect residential amenity and should be given substantial weight, particularly if the programme extends over multiple years. 10) Highway impacts, safety and accessibility: The proposal would generate substantial construction traffic (including HGV movements) in addition to operational trips. It is understood that construction may involve in the order of 250 HGV deliveries per day, with corresponding outbound vehicle movements, together with additional traffic to transport the construction workforce. The local highway network—including Fen Lane, Ockendon Road and Clay Tye Road—is constrained and is not designed to accommodate sustained high volumes of heavy traffic. North Ockendon is already susceptible to severe congestion when incidents occur on the A127 and M25, and the proposed traffic management measures (including any road closures or diversions) would be likely to exacerbate these conditions. Such disruption would materially harm highway safety and accessibility, impede routine servicing and daily activity, and significantly affect essential services, including deliveries, refuse collection and reliable access for emergency vehicles. Any suspension or alteration of the 370 bus service during the works would also have a material adverse effect on those reliant on public transport for access to school, employment and other services. These impacts must be assessed cumulatively alongside other committed and planned schemes, including the proposed M25 link road, which may lead to further closures and the effective isolation of North Ockendon for extended periods, with consequential harm to residents and local businesses. 11) Fen Lane widening and off-site works: Any widening of Fen Lane and related works would directly affect neighbouring properties, including loss of front garden land and removal of established hedgerows that contribute to local character and habitat connectivity. Prolonged and uncertain off-site works would also have adverse implications for residential amenity and may affect property values and marketability. The application documents should provide consistent, detailed and enforceable proposals for traffic management and pedestrian provision. 12) Uncertainty of proposed ecological mitigation: Any proposed "ecology park" would take many years to establish and cannot be treated as an equivalent replacement for the immediate loss of mature habitats. There is no certainty that displaced species would recolonise the area, particularly given ongoing operational noise, lighting and emissions. 13) Lack of demonstrable community benefit: The application has not provided clear, secured and locally relevant benefits that would outweigh the significant environmental, amenity and infrastructure impacts. Existing access to open countryside and green space should not be treated as interchangeable with an industrial development accompanied by compensatory landscaping. 14) Security considerations (including hostile acts/terrorism risk): Data centres may constitute critical national infrastructure and, as such, can be perceived as higher-profile targets for hostile acts, including terrorism or sabotage. This has potential implications for local public safety, policing resources, physical security measures (e.g., perimeter treatments, lighting, surveillance) and emergency planning. I request that the decision-maker is provided with a robust and transparent assessment of security risks and mitigation, informed as appropriate by relevant statutory consultees and security advisers, before any permission is granted.

		For the reasons set out above, I request that the local planning authority refuses the application. In the event that the authority is minded to approve the development, I request that it first requires the applicant to provide adequate and independently verifiable evidence addressing the above matters, and that any permission is subject to robust, enforceable conditions and legally binding obligations.
249	Individual	Please do not share my personal details - name, addess and email address. I strongly object to the above proposal for the reasons set out below and request that the local planning authority gives these matters significant weight in its determination. 1) Electricity demand and network resilience: Data centres are inherently energy-intensive. The proposed development would place substantial additional demand on the local electricity network and could require significant reinforcement works. There is a clear risk of reduced network resilience for existing customers, particularly given recent local power interruptions. 2) Water resources and cooling requirements: Large-scale data centre operations can require significant water inputs for cooling. This demand may place additional pressure on water resources and associated infrastructure, particularly during periods of drought or restriction, with potential implications for residents and the local environment. 3) Air quality, back-up generation and climate impacts: Data centres commonly rely on back-up generators, often diesel-fuelled, with potential emissions of nitrogen oxides and particulate matter. The frequency, duration and testing regime for such plant must be fully assessed to ensure no adverse effects on local air quality. In addition, the development's operational energy demand has material climate implications where electricity supply is not demonstrably additional and renewable. 4) Socio-economic benefits: Notwithstanding the scale of the proposal, operational data centres typically generate relatively limited long-term employment when compared with the magnitude of land-take and infrastructure impacts. The applicant has not demonstrated that the claimed economic benefits outweigh the identified harms. 5) Noise and light impacts: A 24-hour operation with extensive cooling plant, fans and periodic generator testing is likely to give rise to persistent noise, tonal hum and intermittent peaks. The scale of external lighting required for operational and security purposes also risks material light spill, with consequential impacts on residential amenity and nocturnal wildlife. 6) Waste management (including e-waste): Data centres can generate substantial quantities of electronic waste due to rapid equipment replacement cycles. The application should demonstrate robust, auditable arrangements for the storage, transport, recycling and disposal of e-waste and any hazardous components. 7) Principle of development in the Green Belt and harm to character: The proposal represents a substantial industrial-scale development within the Green Belt and in the setting of the local conservation area. By reason of its scale, massing and associated infrastructure, it would fundamentally alter the rural character of North Ockendon. The applicant has not demonstrated the very special circumstances required to justify inappropriate development in the Green Belt, nor that harm to openness and character would be clearly outweighed by other considerations. 8) Biodiversity and protected species: The development would entail extensive groundworks and may require the removal or severance of hedgerows and other habitat features, leading to habitat loss, disturbance and fragmentation. This raises material concerns for local biodiversity and for protected species reported in the area (including badgers and great crested newts). The applicant must demonstrate full compliance with relevant wildlife legislation and provide clear, evidence-based avoidance, mitigation and (where necessary) compensation measures, together with secured long-term management and monitoring proposals. This should include explicit provisions to avoid unlawful disturbance of nesting birds (including migratory species) during the breeding season (typically spring to late summer), noting that it is an offence to disturb, damage or destroy an active nest. 9) Construction impacts: The construction phase is likely to be prolonged and would bring significant adverse effects, including dust, mud, noise, vibration and additional emissions from heavy vehicles and machinery. These impacts would materially affect residential amenity and should be given substantial weight, particularly if the programme extends over multiple years. 10) Highway impacts, safety and accessibility: The proposal would generate substantial construction traffic (including HGV movements) in addition to operational trips. 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		established hedgerows that contribute to local character and habitat connectivity. Prolonged and uncertain off-site works would also have adverse implications for residential amenity and may affect property values and marketability. The application documents should provide consistent, detailed and enforceable proposals for traffic management and pedestrian provision. 12) Uncertainty of proposed ecological mitigation: Any proposed “ecology park” would take many years to establish and cannot be treated as an equivalent replacement for the immediate loss of mature habitats. There is no certainty that displaced species would recolonise the area, particularly given ongoing operational noise, lighting and emissions. 13) Lack of demonstrable community benefit: The application has not provided clear, secured and locally relevant benefits that would outweigh the significant environmental, amenity and infrastructure impacts. Existing access to open countryside and green space should not be treated as interchangeable with an industrial development accompanied by compensatory landscaping. 14) Security considerations (including hostile acts/terrorism risk): Data centres may constitute critical national infrastructure and, as such, can be perceived as higher-profile targets for hostile acts, including terrorism or sabotage. This has potential implications for local public safety, policing resources, physical security measures (e.g., perimeter treatments, lighting, surveillance) and emergency planning. I request that the decision-maker is provided with a robust and transparent assessment of security risks and mitigation, informed as appropriate by relevant statutory consultees and security advisers, before any permission is granted. For the reasons set out above, I request that the local planning authority refuses the application. In the event that the authority is minded to approve the development, I request that it first requires the applicant to provide adequate and independently verifiable evidence addressing the above matters, and that any permission is subject to robust, enforceable conditions and legally binding obligations.
250	Thames Chase Trust	Consultation on a Local Development Order Reference No: LDO0001.26 Address: Land North of Fen Lane, North Ockendon Proposal: Data Centre Campus and associated development Dear Sir / Madam Please find herein the Thames Chase Trust (Thames Chase Community Forest) response to the above Local Development Order. We welcome the opportunity to comment on the East Havering Data Centre Local Development Order proposal. Our response focuses on areas where the proposed development could conflict with the Thames Chase Plan and in doing so, the fabric of the Thames Chase Community Forest. Having reviewed the draft Local Development Order (LDO), including the Design Code, Landscape and Ecological Management and Monitoring Plan (LEMMP), and Environmental Statement (ES), Thames Chase Trust raises a formal objection to the proposed LDO in its current form. It is also worth noting two points, firstly that the time allocated for reviewing the consultation documents was insufficient, particularly given their length and complexity. Secondly, it is a matter of concern that Thames Chase did not receive direct notice of the LDO, but instead became aware of it through an indirect route. While we recognise the strategic and economic drivers underpinning the data centre development, the proposal does not align with the core objectives of the Thames Chase Plan and would result in significant and irreversible harm to the character of the Thames Chase Community Forest landscape. The concerns are set out below under the six objectives of the Thames Chase Plan. Background Thames Chase Trust is the responsible charitable body for Thames Chase, promoting the Thames Chase Community Forest. It aims to make the Thames Chase Community Forest an inspirational example of landscape regeneration. The creation of the Thames Chase Community Forest (TCCF) is governed by its guiding strategy: The Thames Chase Plan. This can be viewed in full at: https://www.thameschase.org.uk/about-thames-chase/thames-chase-plan Vision, Programmes and Objectives The vision for the Thames Chase is: “By 2050, Thames Chase will be recognised as an inspirational example of landscape regeneration where enhanced, connected woodland and green space has made a clear difference to wildlife and peoples’ lives’.”

		The objectives for the Community Forest are: To protect, improve and expand the woodland character of Thames Chase To use Thames Chase to improve local health and wellbeing, volunteering, learning, employment, diversity and equality; and to recognise the historic environment, heritage and culture To positively influence the natural integrity of Thames Chase's air, land and water including wildlife To integrate climate change adaptation and mitigation responses into Thames Chase To develop a connected network of links and accessible, vibrant greenspaces throughout Thames Chase To enable effective partnership working from national to local level to maximise the impact of available resources The Thames Chase Plan is: a material consideration used to inform the preparation of statutory development plans a material consideration in determining planning applications for development within the Thames Chase area a tool to promote and support the environmentally-led approach to strategic, landscape-scale placemaking through the creation of Thames Chase Planning reforms expressed through the National Planning Policy Framework (NPPF) continue to recognise the ongoing role that Community Forests have to play in realising sustainable development. Paragraph 152 of the NPPF states that: '…Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife…' and confirms that: '…an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications.' Consequently, the Thames Chase Plan sets out 6 programmes of delivery that are in alignment with the core aims of the NPPF: Forestry and Landscapes People Nature Climate Access and Connectivity Resources These programmes not only encompass woodland and landscape regeneration, but also how that environment needs to be accessed and used by people to support health and wellbeing, education and economic growth. As well as echoing the ambition of the NPPF, the Community Forest Plan can also help strengthen Local Plan policies relating to these themes, supporting development of new Local Plans and development management decisions. Comments To protect, improve and expand the woodland character of Thames Chase The aim is for the TCCF to have reached its target of 30% woodland cover by 2060. Achieving this will require a combination of protecting existing planting (much of which has taken place since the 1990s), and new large scale woodland planting and local tree planting initiatives; by working with a variety of partners and delivered through a number of mechanisms including development mitigation. The Thames Chase Trust seeks confirmation that woodland cover in the Community Forest will not decrease but increase through this scheme. Although the Design Code includes mitigation measures such as tree planting and buffer zones, these appear insufficient in both scale and maturity to mitigate the impacts of the development or to deliver meaningful woodland expansion, there is also a lack of long term woodland management or commitment to achieving canopy cover. The Thames Chase Trust seeks clarification on this. The TCCF was initially set up (1990) in response to decades of landscape fragmentation and damage due to major road building, settlement expansion and quarrying. Since 1990, through effective partnership working, Thames Chase has repaired, restored and reconnected large areas of this landscape. The Thames Chase Forest Centre forms a nearby neighbouring landform to the proposed development area and Thames Chase would not want to see the fabric of the landscape altered by developments that do not align with the natural landscape. The Thames Chase Trust seeks clarification on this. The Design Code confirms a development of substantial scale, including large data centre buildings, security infrastructure, internal roads, substations, and service yards. The height, massing, and footprint of these buildings would introduce a dominant, industrial form into an open and predominantly undeveloped landscape and out of character for the area. The Thames Chase Trust seeks clarification on this. To use Thames Chase to improve local health and wellbeing, volunteering, learning, employment, diversity and equality; and to recognise the historic environment, heritage and culture From its inception in 1990, the concept of Community Forests has been very much about people. As a landscape-scale intervention, Thames Chase has also contributed towards increasing local pride and the sense of being part of something special, in turn improving community cohesion. The Community Forest is a resource that directly supports the growth of jobs and

		employment relating to forestry, land restoration, food production and natural approaches to mitigating climate change. The Thames Chase Trust seeks confirmation that the scheme would strengthen the links between the Community Forest and the health agenda so that local health and well-being is improved as part of ongoing Community Forest partnership projects. The site should also strengthen the links between the Community Forest and the local business community and promote a partnership approach to volunteering, education and skills development. This would be in line with the vision for the Community Forest and the Thames Chase Plan. In the Environmental Statement there is limited consideration of the historic landscape context and rural character of the area. The Thames Chase Trust seeks clarification on this. To positively influence the natural integrity of Thames Chase's air, land and water including wildlife Thames Chase is extremely concerned that the site is situated within the Metropolitan Green Belt. This is an area that has experienced many years of landscape disruption and since 1990, through the existence of the Community Forest and the dedication of many partners, so much good and positive work has been delivered in this area to reverse the adverse impacts for people, wildlife and landscape. The Thames Chase Trust seeks confirmation that this progress will not be reversed but instead plans produced that will improve the landscape in accordance with the Thames Chase Plan. The Thames Chase Plan prioritises the creation of connected ecological networks, particularly woodland, wetland, and species-rich grassland habitats. The LEMMP appears to focus on site-level mitigation rather than contributing to a wider ecological network. There is limited evidence that the development will strengthen habitat connectivity across the broader landscape or address existing ecological fragmentation. The Thames Chase Trust seeks clarification on this. The reliance on mitigation and compensation measures raises concerns regarding the potential loss of existing habitats and relies heavily on newly created habitats which will take considerable time to establish. This will create a significant time lag before these habitats reach ecological maturity, during which biodiversity value will be reduced. The Thames Chase Trust seeks clarification on this. To integrate climate change adaptation and mitigation responses into Thames Chase The Environmental Statement does not adequately demonstrate how the development aligns with these principles. Data centres are energy-intensive, and there is limited clarity on how the scheme will minimise carbon emissions or contribute to climate resilience beyond baseline compliance. The Thames Chase Trust seeks clarification on this. The long-term energy demand and cooling requirements of data centres raise questions regarding sustainability and alignment with climate resilience objectives set out in the Thames Chase Plan. The Thames Chase Trust seeks clarification on this. There is insufficient clarity on how the development will contribute positively to climate adaptation, including urban cooling, carbon sequestration, and water management at a landscape scale. The Thames Chase Trust seeks clarification on this. To develop a connected network of links and accessible, vibrant greenspaces throughout Thames Chase Since the inception of Thames Chase in 1990, the Community Forest has been planned to favour informal access to the area on foot, cycle and horse. Most access has been via an improved rights of way network, particularly footpaths. Clearly defined areas have been managed for recreation, with open access and a freedom to roam including the significant and expanding areas of community woodland and open habitat. The Thames Chase Trust is very concerned that Public Rights of Way will be affected. The Thames Chase Trust seeks confirmation that the scheme would improve opportunities for recreation and public access, including connectivity with surrounding open spaces. This would be in line with the vision for the Community Forest and the Thames Chase Plan. The Thames Chase Trust is concerned at the prospect of increased traffic levels on local roads in and around the area. This not only relates to infrastructure capacity but also the Community Forest's vision for Greenways, Quietways and off-road routes across the Forest. The Thames Chase Trust seeks clarification on this. To enable effective partnership working from national to local level to maximise the impact of available resources Ensuring that people and potential partners are aware of the TCCF project is critical, both to enable delivery through partnership working and also to ensure that the Forest is used by the public. Thames Chase seeks confirmation that this scheme would increase recreation and public access and as such, would be promoted as an integral piece of the landscape jigsaw for the Community Forest. This would be in line with the vision for the Community Forest and the Thames Chase Plan. Given the scale and sensitivity of the site, the use of a LDO raises concerns about the level of ongoing scrutiny and engagement that will be secured through the planning process. The LDO mechanism may limit opportunities for meaningful collaboration, iterative design, and alignment with strategic partners over time. A more traditional planning approach would better support continued partnership working and ensure that development responds to evolving environmental and community priorities. Conclusion Thank you for the opportunity to comment on this Local Development Order. As identified throughout this response, the Thames Chase Trust objects to the LDO and seeks clarification and confirmation on key elements. Further, if the LDO goes ahead, Thames Chase Trust seeks confirmation that the scheme would be delivered in accordance with the vision for the Community Forest and the Thames Chase Plan; and accordingly, that the Thames Chase Trust will be consulted further. The scheme must not have a detrimental impact upon the landscape or for people and wildlife and must, upon completion, improve the area in accordance with the Thames Chase Plan. The full Thames Chase Plan can be viewed at: https://www.thameschase.org.uk/about-thames-chase/thames-chase-plan

		As stated at the start of this response, the time allocated for reviewing the consultation documents was insufficient, particularly given their length and complexity. Therefore, the Thames Chase Trust is in no doubt that there will have been key comments, observations and objections missed from this response submission. As a result, we seek ongoing engagement with the Council and Data Centre Project Team and if the LDO proceeds, Thames Chase needs to be engaged and consulted throughout to explore how the Thames Chase Plan will be integrated into future proposals.
251	Individual	I believe this will have a detrimental impact on the local environment and community. The roads are too small for the required lorries in the building of this project. It will impact people trying to go to work and school. This road is already used as a major cut through when the m25 is closed . It will also destroy the habitat of many species and is detrimental to the nature of the area
252	Individual	Excellent opportunity to bring investment and jobs into the region. Pleased to see the improvements to be made to the borough's green spaces in S106 agreement. Be great to see this development come to fruition.
253	Individual	All very well and good but green spaces are disappearing at an alarming rate across the country. Farmland is being developed as horrible housing, Crowlands golf course under threat and now this data centre that, once initiated, will only ever expand over time and encroach on the surrounding countryside. We don't need more access to green spaces as a carrot but green spaces do need to be protected and to exist for our ever dwindling flora and fauna. I object to this proposal but suspect that it is a done deal and that brown envelopes have already been exchanged.
254	Individual	I am opposed to this development . It will have a devastating effect on this area of Green Belt land , the environment , the local farms and local residents and road users . I have read the proposals regarding prohibitive parking charges for staff who would work at the site , the encouragement to travel by public transport or bicycle :people do not want this ! The Mayor of London is obsessed on ideological grounds with a car less society - complete nonsense . Where is the vehicular access to the site ? It is not clear ,but Ockendon Road is congested enough now . Fen Lane is a vey narrow lane - there is barely enough room for vehicles coming from .opposite directions. An LDO is an undemocratic way of proceeding - normal planning steps are swerved . The impression is that the outcome of the project has already been decided . The views from Top Meadow Golf course will be ruined - further, because a solar farm has already blighted the view from part of the course . The local residents will suffer extreme convenience during construction , and will suffer loss of view and amenity , their homes will be devalued . Amusingly one of the statements in support of the proposal at 14.19 claims that the development " would not lead to unacceptable overlooking " The proposers say that various other sites have been investigated but are not suitable . The report does not identify those other sites .However I believe there are other sites eg in areas which are already industrial which would be far more suitable- along the Thames springs to mind - and would not have the detrimental effect on the environment and Green Belt that this proposal will .
255	Individual	This centre should be built on brownfield land in Newham near the City Airport. The Countryside should not be destroyed for something which will not benefit anyone locally. Building the centre will be given to large contractors who will not ensure workforce is local. The Running of the data centre will create a minimal amount of jobs, will take a huge amount of water to cool and take a huge amount of energy to power. There are no benefits for local residents, only potential problems.
256	Individual	Would this data centre not cause more issues with traffic. Could this not be a target for criminal gangs. Data Centres also would mean that the area would be used for business and not much needed homes. Would this create a profit for Havering or is this a scheme that will in fact impact on the community members and impact them financially. Havering needs to look at the tasks it has started and not finished. There has been a wide range of expected financial gain projects by Havering, which in fact has cost the council and community dearly in finance loss and environmental impact.
257	Individual	[redacted]The elevated view from this journey will no longer be the green countryside that I currently enjoy.[redacted] and this will dramatically spoil any enjoyment that this area holds. The noise and traffic from construction will be appalling. Havering is the only London Borough that extends beyond the M25 and thus has actual countryside and now you want to pour concrete over a large piece of it in exchange for more business rates. The loss of this environment to concrete is ireversable and the use of terms like eco park as part of the developement are a smokescreen for the loss of actual eco systems.
258	Individual	There is a global concern on the effects of data centres on our environment and climate. Many issues, concerns and negative effects have and are being reported on around the world. Panorama had such an episode on those issues on data centres in Ireland. There are much bigger data centres exist and more are being built in the United States which also include chip manufacturing plants. Questions are finally being asked regarding their negative effects on our environment. There is a massive requirement of energy and water in running and cooling data centre servers. Has there been a calculation on how much will be used as servers will run 24 hours, 7 days a week? It has been reported that they can use as much power and water as a whole town? Where will they draw the water supply from and where will they discharge this water? Their commitment to overhaul local electrical systems is simply to be able to drawn down this huge demand. Sustainable energy and reliance on solar and wind power will not be sufficient. Such a demand on our public utilities would increase energy costs and impact residents' bills unfairly during a cost of living crisis especially in wintertime. With regard to the use of water to cool servers can I assume that the water will then be re-entering supply in some way? Has the issue that the water may potentially be polluted been independently addressed? Please be aware that it has taken years for us to be made aware of the pollution of forever chemicals and plastics in our water. We need to also consider the temperature effects of that water on the environment and local wildlife. This is a critical decision for our future generations as well and should be considered before going ahead. Clean drinking water is necessary for life and plays a great role in the nation's health. The recent dumping of raw sewage and forever chemicals have consequences to our health such as fetal growth, cancer rates, liver/kidney/immune system damage etc. What regulations exists for water exiting data centres with regard to potential contamination and considering the climate is constantly in the news, how will the vast consumption of water by data

		centres affect the water required by the Havering population? Water is an will be a precious resource that is predicted to be in shortage so a data centre will be a huge drain on our natural resources. Rather than asking the data centre company are any independent studies being done by the council to obtain more information? Also considering ongoing safety checks should be independent and controlled by the council but not billed to the people. As digital services are increasingly prioritized and introduced they will inevitably become part of our critical infrastructure. This will ensure their needs are prioritized over and above those of our residents who are left to pay the price. Access to energy and clean water is essential to life and any threats of blackout, restrictions, shortages or damage to health is unacceptable. Public utilities are paid for and subsidized by the public. Has due diligence been done on Digital Reef? Who are the cabinet members that have endorsed them? Are there any benefits or conflicts of interest involved as was sadly the case for Covid contracts? What is the digital infrastructure they are referring to? What sort of data will be held on these servers, by who and for what reason? Who will be the end user of the data? They promise to be a potential learning centre for green tech development. This sounds experimental so who will be overseeing the safety issue interests of residents in regard to this energy, waste, agriculture or land management? What do they mean by land management? How does it propose to be a Zero Carbon facility when it requires so much more than sustainable energy sources when the production of energy using fossil fuels has been demonized? Their partnership companies include Space Park Leicester, Unversity of Leicester, Earth & Space Sustainability Initiative and ESC Future generations so will they be collaborating here? To what end, jobs, testing experiments. Monitoring agricultural and other land use to what end? Who will be ensuring and paying for the travel infrastructure to this site? The headlong rush of industry, corporations and governments into digital services must be held to account and the health and safety of our residents should be a priority. We have not been asked about UN climate and sustainable goals. They are not an elected body and should not have such global power to affect wide-sweeping and unchallenged views. It is time we asked questions of our government's agendas. There should be a moratorium on building any data centres and charging forward into developing AI and digital dependence without understanding the impact on our planet. How many data centres are there in the UK, where are they located and how many more are proposed? The use of green belt or farming land should be cautiously considered as our country should be aiming for self-sufficiency in food production as imports can be affected as the current issues in Iran, accidents, politics and war destabilise shipping. We are already losing farm land due to pressures on farmers and the incentives to rewild land or cover it solar panels. What are the long-term considerations of this in a world that increasingly highlights sustainability? Surely feeding the population should be a priority. They mention storing batteries. What type of batteries? Considering the battery issues found in electric vehicles I assume these are much more powerful. What of the issues of these batteries potentially catching fire. The impact on the Fire Service availability in attending such a disaster and the drain on resources or the environmental effects of the fire and the necessary chemicals that be necessitate being used? Recently I have heard concerns over the noise of these data centres described as a hum, a vibration that has an effect on humans, animals and wildlife. For example sleep disturbances affecting the health of residents who find the value of their houses reduced and find they cannot move away. I also understand an environmental party had issued concerns previously with regard to data centres. What are their current concerns and comments? I was unable to attend the two industry led presentations and find it extremely concerning that the amount of data that has been put online is too much for the general public to be able to read, understand. research and comment on in such a short timeframe. The consultation has run over the Easter period and many people will be unaware or not had the time due to school holidays to have their say on such a critical proposed development on green belt land. I understand there has been legal action taken regarding the insufficient timeframe of this consultation? Additionally in submitting these views I have noticed that the deadline has been extended to the 12th April. However, given the importance and complexity in getting these decisions correct for future generations my points remain valid. We should have a debate to hear independent voices and experts who have have evidence that highlights issues with data centres to be considered. The people deserve to hear all sides of the debate and should be informed to make their opinions over corporate, government, UN etc agendas that have not been voted for or independently investigated.

		The headline promise of jobs seems to be a cumulation of year on year jobs as opposed to at any one time. Including construction jobs which will obviously be lost on completion. These jobs also seem to be across the UK. Exactly how does that job spread manifest and crucially how many will actually be local? Will they be UK led companies and contracts or overseas? Or even bring jobs to our local Havering businesses? Once we admit one will it open the doors to further data centres being built without learning lessons from our global community on the potential effects. Or will the lure of money and investment from big corporations and UN agendas outweigh the responsibility to not only current citizens and the environment but the future too. Will those jobs be local people or people brought in from outside the area or even overseas as expert staff. With the ongoing development of these industries how many permanent staff will be retained in the future and they can pretty much be run automatically, remotely or be eventually scaled back to a skeleton staff which will not be reflected in the data. Have the council undertaken independent reports or assessed the increased impact of AI generally? Or have they simply accepted the evidence supplied to them by the company that wished to build and run the proposed centre. This would obviously be a concern due to bias. As you can see there are many concerns and issues to the decision to permit the building of data centres especially surrounding the unintended effects that could affect Havering residents both now and possibly in the future.
259	Individual	In the interests of our precious green belt land I wholly object to the proposed development of a data centre on said land.
260	Individual	I support the data centre and think it will be good for the local economy.
261	Individual	I am against the building of the data centre. It will be catastrophic for the area: destroying green belt and irrevocably damaging habitats, displacing and killing local wildlife. The excess traffic during the building process will also have a long lasting impact on the health of residents. I have no faith that the proposed park and visitor centre will be built. I believe this is a ploy to ensure permission is granted and will then be withdrawn at some point.
262	[redacted]	I am writing regarding the East Havering Data Centre proposals, and would like to begin with complaints about the consultation process. The initial consultation period was set to last between March 1st and April 7th. However, it took 6 days before Upminster Library had one complete copy of the documents. To read through the 2700 pages of those documents, one person would need to return to the same library on multiple days and hope that another resident hadn't gotten to it first. [redacted] public consultation meeting at Romford Town Hall on March 25th. The presentation was high level and featured no detail from documents within the LDO paperwork. [redacted] The chairing of the event was poor. There was no PA system so people could not hear. There were more than 8 panelists. [redacted] just under 4 miles from the 218 hectares development and, like many of their neighbours, had no idea of this Data Centre proposal until the last 2 weeks. This is the nearest built up area to the centre with an older demographic than some Havering wards that need to be proactively reached out to. All discussion of the Centre in pre-consultation exercises has so far been limited to the small community in North Ockendon, but the impact of this development could be far far greater. In fact, I would say that this development threatens North Ockendon's existence, along with the Lower Thames Crossing.
263	[redacted]	I am writing regarding objections to the East Havering Data Centre proposals. Cumulative Impact of nearby data centres Google are in consultation stage for a hyperscale data centre just over 5 miles from the North Ockendon site in Thurrock, located at the former Arena Essex site just south of the A13. While this data centre is set to be 4 times smaller in size than the East Havering Data Centre, it is set to emit over half a million tonnes of Carbon Dioxide a week, according to the Guardian (https://www.theguardian.com/technology/2025/sep/15/google-datacentre-kent-co2-thurrock-uk-ai). No information has been published on the MW of this site. This site is also within the Thames Freeport area which local politicians have also suggested should contain the East Havering Data Centre. In contrast, we know that East Havering Data Centre intends to be a 600MW facility, the largest in Europe, demanding the same amount of power for all homes in both Havering and Thurrock three times over. It claims to be 'zero carbon' in operation, not counting for embedded carbon, but to do so will need to upgrade the Warley substation and provide multiple additional substations, with priority for power usage moving from residential usage to the Data Centre. It will also not be initially fossil free, as the developer originally suggested. There is no stated timescale as to when this must happen. Given evidence of Data Centre power usage preventing homes from connecting to the power grid in other countries, this will almost certainly be a barrier to meeting London and national housing targets and may cause outages for local homes. The East Havering Data Centre Statement of Reasons cites water cooling under 14.11, where limits are set by the LDO, but the presentation given at the in-person consultation on March 25th stated air cooling.

		If both proposals are suggesting the use of air cooling, because these are less controversial than water cooling (requires large amounts of fresh water, this can upset the water table locally), or chemical cooling (risk of environmental contamination of nearby land and water supplies with 'forever chemicals'), then there are other problems. Air cooling is suitable only for low density data centre operations. For hyperscale operations serving high density AI applications, air cooling is not sufficient. It would appear, reading through the lines, that we could have two data centres that are using fossil fuels from start of operation, having to utilise alternatives to air cooling which either upset the water table or risk dangerous pollution, destroying centuries old ecosystems spanning around 270 hectares, and both within a zone of lax environmental regulations. Cumulative impact of Green Belt loss across South Essex and North East London 12.32 of the Statement of Reasons document concludes that the LDO site is not 'grey belt' land. We agree. However, I dispute the conclusion of section 13 in this document that there are "very special circumstances" due to a "need for data centre floorspace to serve the London cloud region by 2029 and beyond". Where is this need identified? Why does it need to be concentrated? After 10-20 years of construction, the likelihood that technology has not moved on and that the footprint required to provide for high latency use cases is the same is rather ridiculous. A more preferable approach would be many smaller scale centres that have a much shorter construction time. One of the criteria of inappropriate development within designated Metropolitan Green Belt is urban sprawl. Firstly, the two data centres will create a chain of residential and industrial land use between the QEII Bridge and the East Havering Data Centre. South Ockendon will be penned in by Data Centres and roads, including the new Lower Thames Crossing. South Ockendon is also due for a new 54 acre housing development at Echo Farm, approved by Thurrock Council in January 2026. From Housing Today, "Anglian Water also lodged an objection, stating that the area's sewer network is currently unable to cope with the extra foul water from the development and urged the developer to fund the works required. The council accepted this as a solvable concern, although the developer has not yet finalised a solution." Then looking further across South Essex, there is another Data Centre project planned for Wickford on Green Belt land that has received planning approval from Basildon Council. Horndon St Marys has a housing development planned for 104 hectares of agricultural land, just North East of the Data Centre. There's Brentwood Enterprise Park, taken out of Green Belt in the Brentwood Local Plan 2016-2033 to justify employment needs. 223 hectares of land taken out of Green Belt at Dunton Hills Garden Village in West Horndon for new housing. Lastly, Bournes Green is 10,000 houses planned for Green Belt land between Rochford and Southend. This will change the entire character of this part of North East London and Essex, swallowing up not just tiny villages like North Ockendon or Bulphan, but swathes of Green Belt and taking a further sledgehammer to the UK's biodiversity crisis. Skylark Habitat Concerns You will likely be aware of concerns that badger setts have been disturbed during the preliminary ground testing, protected under the Protection of Badgers Act 1992. However, the Statement of Reasons also briefly mentions that Section 106 money will pay for "Compensatory Skylark Habitat". I want to bring attention to the fact that Skylarks are notoriously difficult to relocate or disperse given their territorial behaviour and that skylarks are protected under the Wildlife and Countryside Act 1981, making it illegal to intentionally kill, injure, or destroy their active nests. "Skylark plots would be provided in on-site habitats (likely within retained SINC habitat) in the north-west of the site" as referred to in the Non-Technical Summary seems highly inadequate to me. Will there be enough space for them all? The Summary refers to losing breeding pairs which would be unfortunate. Use by schools To refer to the presentation from March 25th again, it was stated that one benefit was that schools could visit the Ecology Park. I attended James Oglethorpe school as a child, the closest school to the site, as well as Hall Mead School. Oglethorpe has copious amounts of green space for the children attending, vastly exceeding most other schools. There is also the nearby Thames Chase Nature Reserve which has a visitors centre that schools can use. The effects on biodiversity from the 10 years minimum of heavy machinery, traffic and disturbance to the local ecosystem is going to affect neighbouring areas including the Nature Reserve. I believe your claim to be greenwashing. The Ecology Park is not necessary for local schools to take children for visits to see nature or for outdoor play. For more active outdoor pursuits, there is also the Stubbers Centre close by.
264	Individual	This is a great plan. It will create jobs, local tax income for Havering and will enhance the UK digital infrastructure. - I like that is net zero by design too. I hope it gets approved.
265	Individual	Currently there are substantial amounts of the world's computer resources that are devoted to Crypto currency mining. It is difficult to understand how this provides any useful function to society. Seemingly not being useful, one wonders how much longer such activity will continue. Will demand for computer facilities reduce once in the long term common sense prevails? There are

		already existing suggestions as to how mining could be replaced and thereby reducing world computer facility requirements. Will we have built centres with computers, and destroyed green belt and farmland, which the world never needed? Do we know what the Havering facilities will be used for? Shall we get rid of some green belt to help some Crypto miners? I must confess I object .
266	Individual	What benefits will the council/neighbouring areas get from this? As it doesn't impact me I don't have an opinion
267	Individual	I am vehemently against this proposal. It is a huge site which will adversely impact residents in the area.
268	Individual	NO to the data center. Water pressure in the area will drop
269	Individual	Havering data centre is being proposed by a property development group that had an average of 11 employees in 2025. The group at the end of 2025 had £6.4m of net current assets. The £6.9m it said it will pay as green belt mitigation, will supposedly be paid as floor space is completed. Such mitigation payments already have planned uses and include “Interpretation / entrance signage at Abbey Wood Lane” and planting of hedges in Cranham. The proposal is to use 99 acres of mainly Green belt land adjacent to Fen Lane in North Ockendon, on the boundary of Havering. There is already an approved development on 52 acres for Google to build a major data centre campus at North Weald Airfield, located near Harlow in Essex. The project, which is on the site of a former RAF airbase near South Weald. In 2025 google opened a data centre on 33 acres of green belt in Waltham Cross. There is an approved data centre development on 85 acres of green belt in Potters Bar to be completed by 2029. There is a 21 acre green belt data centre site approved at Three Rivers. A data centre in 18 acres of green belt in Iver has been put on hold as the government did not use the correct procedure when approving it. There are of course numerous other data centres apart from those ones mentioned above. Will we need them all? Will technology improve and reduce space requirements of data centres? Will crypto mining end and reduce demands on data centres? Obviously there are a lot of assumptions and forecasts that cannot be perfect, so really only time will tell. In the mean time a lot of green belt is being destroyed which includes the proposal that is currently being consulted on. I accordingly object.
270	Individual	The data centre will be destroying valuable, beautiful farmland and countryside never to be reclaimed. If these centres are actually needed for data they could surely be put in an area that won't harm the environment and wild life. This project will harm the eco system in addition to the amount of water and power it will use. This will not be an asset to Havering.
271	Individual	this proposal would negatively impact the surrounding residents as well as air and water quality. we do not need more data centres on green land
272	Individual	I am vehemently against this proposal on just about every score. Too big, to consumptive (water, energy, space) and very possibly no longer justified. Interest in AI use is waning fast. This is Green Belt land. Enough said. Information about job creation is nonsense. Yes, it may take some hundreds to build the site - temportary jobs. Once complete I'd be surprised if it took more than 5 people to man. Just not justification to drive a coach and horeses through the rules, the preferences, and the aethestics of the site. My only conclusion if this is approved is that money will have changed hands. Lets keep an eye on our planners car purchases over the next few years.
273	Individual	PLEASE NOTE I SUBMIT THIS AS A COUNCILLOR OF UPMINSTER WARD AT THE TIME OF SUBMISSION AND AS A RESIDENT OF LONDON BOROUGH OF HAVERING Reference No: LDO0001.26 Address: Land North of Fen Lane, North Ockendon Proposal: Data Centre Campus and associated development With regards to the East Havering Data Centre proposals (EHDC), I offer the following observations, and in particular in relation to the proposed mitigations as set out in the Draft Heads of Terms (S106) document. BACKGROUND - EFFECT ON THE GREENBELT It should be acknowledged that the EHDC development will have a significant detrimental impact on Green Belt land in the locality of North Ockendon. The proposed site of the EHDC is a small section of a large tract of Green Belt land surrounding Upminster. Notwithstanding it is a small part, the proposed site plays a vital role in maintaining a separation between the London Borough of Havering (and its wards/communities such as Upminster, Cranham and North Ockendon) and nearby local authority areas such as Thurrock and Brentwood. It is clear that once the Green Belt is compromised in the London Borough of Havering, it will be significantly more difficult to resist further encroachment from other areas. This is particularly relevant given increasing development pressure on the fringes of Thurrock bordering the London Borough of Havering. The cumulative effect provides for a gradual erosion of the Green Belt rather

		than a single isolated development. The application does not demonstrate that cumulative impacts have been robustly assessed. In particular, the interaction with the Lower Thames Crossing (LTC) and wider regional development has not been fully considered. There is an inherent risk that overlapping construction periods will result in sustained and unacceptable pressure on the local transport network, far beyond what is presented in isolated assessments. MITIGATION - S106 Whilst there is analysis within the documentation of the impact on residential properties in the locality, and in terms of various environmental factors, there does not appear to be any direct recognition of the impact on the local community (particularly that in North Ockendon). Whilst the S106 provides for environmental mitigations and necessary highway improvements, primarily to facilitate the installation of the buildings and infrastructure, this does very little to address the social and wellbeing effects on local residents. The Draft Heads of Terms for Section 106 Obligations contain a mixture of interventions, some close to or part of the EDHC campus and other elements delivered across the borough, primarily green space improvements. The ecology park, its access routes, road, and footway improvements are presumably viewed as local mitigations (albeit they also serve other users including access for the development). Given that the Highways works are directed and constrained to the construction routes, there are adjoining routes (especially pedestrian footways such as St. Mary's Lane, Clay Tye Road and Ockendon Road) which should be included as part of the enhanced public access to the ecology park. Poor local connectivity and appalling footpath quality have been issues that a local Ward Councillor, Cllr Oscar Ford, has raised in his capacity as Ward Councillor. This has been either through the maintenance services team and/or via Schemes request. Since a local bus route to Upminster was scrapped, the need for better footpaths in the area has been more prevalent. It should be noted and acknowledged that the scale of the development will result in long-term construction activity, most likely over a decade. This will place sustained pressure on local roads used daily by residents, particularly around Upminster and North Ockendon. These roads are not designed for prolonged high volumes of heavy goods vehicle traffic (they are B-roads and generally classified as country lanes). Based on local knowledge, even current traffic levels can create congestion at key points, and this proposal would significantly worsen those conditions over an extended period. More detailed observations of local road conditions at various times of the day need to be considered and reviewed further with potential S106 mitigations. There are two Upminster parks (Upminster Park in Corbets Tey Rd and Clockhouse Gardens in St Mary's Lane) which have been excluded from the S106 listings. These two parks will also have relevance to the North Ockendon residents as these are the closest public parks and sports ground to the locality, both situated close to the Upminster Town Centre. Parklands has been included and should still be considered, as this is nearer to North Ockendon than the other two parks mentioned above. Stubbers Activity Centre is another area which ought to be considered. There is nothing in the S106 documentation in relation to interconnectivity to other public green provisions such as Thames Chase. This is an oversight, though a refreshed Local Plan might be the place to draw together this aspect (in the light of the Lower Thames Crossing impact, potential responses to calls for development sites, and through 'Grey Belt' designation). Another challenge exists in relation to the distribution and use of any Community Infrastructure Levy (CIL) arising from the development. The application of those funds is not specified in the S106 document and is likely to be less tied to improving the locality. One way to secure a greater proportion of CIL monies might be to take forward the development of a Neighbourhood Plan. If established, with direct involvement from the community and forming part of the wider Local Plan once it is in place, this could help to improve trust and local cohesion which has been sorely tested through the EHDC development process. A Neighbourhood Plan could be a useful reference point for the utilisation of CIL, S106 and funds such as those arising from the (1) LTC, (2) St Mary's Lane Battery Storage System (BESS) development – P1498.24- and (3) potentially the proposed Warley Sub Station developments in due course. All of the above, from a local perspective, creates a clear imbalance between the proposed benefits of the EDHC to the borough and the significant (long-term impacts) on the surrounding community. For this reason, every opportunity should be taken to ensure S106 mitigations are effectively put into place and CIL, and other available funds, should be used in the most effective way to ensure that the locality and, in particular the community around Upminster and North Ockendon, have full benefit of those funds.
274	Individual	I would like to reject the planning permission for developing a data centre at the north of Fen Lane in North Ockendon. It will demage the vast green environment forever without sufficient mitigation to preserve wild lifes and vegetations. Meanwhile, it is not going to benefit the Havering borough sufficient enough for the sacrifices of the environment.
275	Individual	As the past few weeks have underscored, our world is increasingly volatile and vulnerable. Securing our food security is discussed regularly. As climate change renders increasing areas of the world redundant for supporting its human population, our still-temperate land becomes increasingly important for feeding our country and potentially the world (https://www.mdpi.com/2071-1050/15/20/14783). As increasing tracts of agricultural land along the Thames Estuary are built on, what remains becomes increasingly important to our country's food economy. This proposed development will destroy this valuable resource permanently. When the proposed data centres are decommissioned in twenty years' time, the land can never be returned to agricultural use. Surely redevelopment of an existing greyfield or brownfield site, with minimal impact upon a close residential area, would be a more appropriate proposal, evidencing a mature and professional

		attitude with a long-term vision to our land husbandry. As high-density housing is proposed for Havering already (https://www.havering.gov.uk/downloads/file/5300/havering_local_plan_2016_-_2031.pdf), the potentially counterbalancing value of our Greenbelt takes on ever greater significance in alignment with its original intention to "prevent urban sprawl, keep land permanently open, prevent town merging, and protect the countryside". This principle has been acknowledged for 150 years and was first codified by the Atlee Government, a truly visionary administration that improved living standards no end. As residential development is also proposed at Bulphan, Laindon and Billericay a complete concrete plinth from inner London to Wickford can be envisioned. This proposal offers no positive benefit to the villages of North and South Ockendon or Cranham with no increased employment, no increased investment in the local economy, and no environmental improvement. The local environment is already being marginalised by the proposed Thames Gateway project. While it could be argued that the villages already experience considerable noise pollution from the M25 already so why not pollute a polluted area some more, it can be argued conversely that local inhabitants are already experiencing enough. There is an increasing body of evidence of the negative impact of low-frequency hum to local residents' health and wellbeing (https://www.eesi.org/articles/view/communities-are-raising-noise-pollution-concernsabout-data-centers#:~:text=Data%20centers%20emit%20sounds%20from,legal%20authority%20to%20do%20so.). The water table was notably affected by the construction of the M25 and will no doubt be affected again by the Thames Gateway. Data centres are renowned for their huge water consumption. Unless it is hoped that the data centre would make use of the huge run-off from the proposed residential developments in the area - a rather moist, fenland area - our country's anticipated future water scarcity and its failure to develop an infrastructure to address it, has been raised in many fora (https://hansard.parliament.uk/commons/2025-12-09/debates/39E79F6D-FED7-4CE2-8928-8CE379AD1572/WaterScarcity). The data centre proposal does help to draw two potential terrorist targets together: digital and logistical infrastructures - the proposed data centre and the M25 - could be damaged significantly in one strike.
276	Individual	I live in Havering and I strongly oppose the proposed construction of this data centre on prime green belt land. Havering Council seem to be acting in a very blase way in dealing with this, in only giving 30 days consultation instead of 3 months for something which is probably the most important planning decision Havering has ever undertaken. As far as I can make out, Havering have also failed to consult with residents who live close by which is absolutely disgusting to disregard people in this way as if they do not matter. Havering seem to be intent on creating 'village green' areas in Havering, yet want to destroy green belt land. A few months back, some people unlawfully erected buildings on farmland to develop a scaffold yard in Noak Hill. Havering Council issued enforcement notices stating 'the development fails to preserve the openness of the green belt' and also that it is harmful to the visual amenity and open character of the surrounding area. I find this highly hypocritical that Havering could say that about the building on Noak Hill, yet they seem to be in favour of this massive Data Centre on what is a beautiful area of green belt, covering something like 99 acres of land. This land is teeming with wild flowers and all sorts of wildlife and you are proposing to destroy all that. Surely that is not right that Havering should oppose one and approve another?? The company that has applied to construct the data centre don't seem to have any experience in building data centres and I believe they have never built one before. There are other various data centres close by so I am not sure why we need another one. A data centre is going to be built at North Weald Airfield, I believe there is already one at Rayleigh, there is one at Waltham Cross and one currently in construction at Potters Bar. Another one has been approved for Three Rivers. How many do we need?? I believe, if this were to go ahead it will take almost 20 years for it to be finished, by that time I believe technology would have moved on and we probably wouldn't even need it by then so green belt would have been destroyed for what? During construction the increased traffic in that area of North Ockendon would be horrendous and that alone would destroy local wildlife habitat as well as flora and fauna. Another thing to bear in mind is demand on our water supplies. A data centre, especially during hot weather could use millions of gallons of water. We need to treat water respectfully and carefully and we should only use it for human consumption. How would we be able to sustain water levels in the area if we have this data centre guzzling so much water? This has been an important consideration in the USA and I believe they are seriously looking at this aspect, in some cases not going ahead with construction because of this. How would the data centre pollution affect the surrounding area? There are bound to be affects to the surrounding area. I strongly oppose to the construction of this data centre on green belt land. Green belt land should be left alone. Surely it is called green belt for a reason.
277	Individual	This defies planning policy regarding use of green belt land, once built it will change the area, transforming a small village (often commented on as an unusual setting in London) into an industrial area, and making it easier to justify more and similar construction works in the future. The LDO process has been used to bypass normal planning rules and checks, and the consultation process is far too short and rushed for a scheme of this size. This is not any sort of unique project which can justify being built in this location. While we are insisting that housing should be accommodated within brownfield sites in order to retain green belt land, it seems unacceptable to consider building an industrial site in he middle of green belt.
278	Individual	I am concerned about the fact that this development will scar what is left of our countryside: reducing biodiversity, polluting the surrounding area and wreaking havoc on local communities. The development also risks becoming a controversial, media touch point (like the Astley warehouse development) which would engender resentment in local communities–and undermine the Council's authority. There are also valid concerns about the energy consumption that would follow such a development: at a time when water is more scarce, and the sum total of renewable energy in this country

		would be unfit to power such a development (relying on dwindling fossil fuels in an era of geopolitical unrest), this data centre would be costly and wildly inefficient. Local residents will not abide by their natural resources being redirected towards a project that does not enrich their community: the data centre may affect the pressure or quality of their tap water, or even cause power cuts.
279	Individual	I strongly oppose the proposed data centre development in Havering on the grounds of environmental impact, infrastructure strain, and limited local benefit. 1. Environmental Impact and Sustainability Concerns Data centres are energy-intensive facilities, requiring vast amounts of electricity for both operation and cooling. At a time when Havering and London are striving to meet climate targets, approving a project that significantly increases carbon emissions is counterproductive. Even where renewable energy is cited, the overall demand placed on the grid risks diverting clean energy from homes and other essential services. Additionally, water usage for cooling systems raises further sustainability concerns, particularly during periods of water stress. 2. Strain on Local Infrastructure The development is likely to place additional pressure on already stretched local infrastructure. This includes increased demand on the electricity network, potential noise pollution from cooling systems, and increased traffic during construction and maintenance phases. Local residents should not have to bear the burden of these disruptions, especially when the long-term operational footprint provides minimal community interaction or benefit. 3. Limited Economic Benefit to the Local Community While the proposal may highlight job creation, data centres typically generate relatively few long-term employment opportunities once operational. The majority of jobs are created during construction, with only a small number of highly specialised roles remaining thereafter. This does not represent meaningful or inclusive economic growth for local residents. 4. Land Use and Opportunity Cost Havering should prioritise developments that deliver tangible benefits to the community, such as affordable housing, green spaces, or mixed-use developments that support local businesses and social infrastructure. Allocating valuable land to a data centre—essentially a low-employment, high-consumption facility—represents a poor use of space given current local needs. 5. Quality of Life Concerns Residents may experience ongoing noise from cooling systems, visual intrusion, and a general industrialisation of the area. This risks diminishing the character of Havering and negatively impacting property values and wellbeing.
280	Individual	Infrastructure not suitable for this development. Green belt land is limited in the capital and should not be used in any instances for this or housing. We need to preserve villages and the local environment at all costs. Build it on brown field sites and use them as the ecology park to encourage biodiversity on contaminated land. We do not want this.
281	Individual	I totally support a new data centre, bringing business and jobs to Havering. Nimby and hypocritical to respond any other way on the digital device i am typing on right now!
282	Individual	do not build on green belt once its gone its gone for generations to come disgusting
283	Individual	All good, improved transport infrastructure and more jobs. Very positive move.
284	Individual	We need the employment opportunities this Data Center can provide to the borough, please approve this proposal
285	Individual	Thie proposed development should not be allowed to progress. The land is Green Belt, the amount of power it will require is unfathomable, and the disruption caused during construction is unacceptable. If the Data Centre is absolutely necessary, and I am not at all sure that it is, it should be built on a "brown field" site that has previously been used for industry.
286	Individual	I object to the proposed East Havering Data Centre Campus on the grounds that it constitutes inappropriate development within the Green Belt. The Green Belt serves a critical role in preventing urban sprawl, safeguarding the countryside, and maintaining ecological integrity. The scale and industrial nature of this proposal including multiple large data centre buildings and associated infrastructure would fundamentally alter the character of this protected land. While the proposal highlights economic benefits and the inclusion of an Ecology Park, these do not clearly outweigh the harm caused by the loss of Green Belt land. The creation of new green space does not replace the value of existing natural landscapes and ecosystems. Furthermore, the development raises concerns around long-term environmental sustainability, including energy demand, carbon impact, and increased traffic and infrastructure pressures in a semi-rural area. In line with national and local planning policy, development on Green Belt land should only be permitted in very special circumstances. It is not evident that such circumstances have been sufficiently demonstrated in this case. I therefore urge the Local Planning Authority to reject the Local Development Order.
287	Individual	We do not need another green area built in the Rainham area. We have enough disruption with quarries and the issues with launders lane which need sorting first. Once built on then where do you stop? Please consider using Brown field sites!!!

288	Individual	Disagree with proposals as it increases hard standing surfaces. This also negatively impacts on wildlife and surrounding natural landscape.
289	Individual	I am totally opposed to a development of this size in such a nice quiet country like location. There are plenty of brownfield sites available on former factory sites for example - this is a horrendous act of vandalism on the landscape and a massive eco disaster from an energy perspective.
290	Individual	The data centre is being built on green belt land when there are alternative sites which would cause less environmental damage. The enormous vacant buildings at Cold Harbour could be reporposed or alternatively the blighted land between the M25 and the new sliproad for the new Thames Crossing would make an ideal site
291	Individual	I think this is a fantastic opportunity for Havering and should be backed to the hilt. Ignore the Luddites! If we don't do it, then someone else will (and benefit from the development).
292	Individual	Supported
293	Individual	This data centre should NOT go ahead. We must revert to less energy grabbing and planet destroying methods of working. Lees on-line usage, fewer emails, fewer texts and mobile use. The current obsession with on-line everyting and so called AI is envirmentally unsustainable. AI is useful in a few limited cases. It is totally unnecessary for the majority of people. I do not need every appointment confirmed multiple times by text and email. I do need on-line orders confirmed multiple times by textand email, then notified that it will be delivered tomorrow, then notified when it is out for delivery - then notified thast it has been delivered - then get more text / email ewith a survey asking how good my delivery was - then more text / email asking me to review the product. What a crazy way to work. Save the planey andf everybodies time by NOT building this data centre - and by legally restricting pointless text / email 'communicastions.'
294	Individual	This data centre is not going to be good for the environment. It will bring more traffic into an already busy area, with lorries and trucks needing to access it via small country lanes. What happened to saving green belt areas. This is a bad idea for this area. I do not agree with this data centre
295	Individual	It should go without saying Destroying green space is highly inappropriate Opposed
296	Individual	I think this is a real opportunity to bring much needed employment to our Borough. It would also bring much needed income to the Borough. There are good transport links. This is futuristic employment giving young people a real opportunity for real jobs. Havering is a very good Borough to live in and housing is reasonably priced for a Greater London Borough. Don't waste this opportunity with negative objections
297	Individual	I am opposed to the building of the data centre in Havering
298	Individual	I oppose building this development on green belt fertile agricultural land. It would be out of character for the area and adversely impact the locality. It would increase traffic flows significantly and would be detrimental to the area.
299	Essex & Suffolk Water	A copy of this response has also been emailed into EastHaveringDataCentre@havering.gov.uk Thank you for the opportunity to provide a consultation response in respect of the proposed Local Development Order (LDO). We have reviewed the draft LDO in detail and set out our comments below on a range of matters we consider relevant to the proposal, and which may affect us in our role as the statutory water undertaker. Where possible, our comments are structured by topic to aid ease of reference . Essex & Suffolk Water (ESW) has statutory duties to provide safe and reliable water services across the region. East Anglia is one of the driest areas in the country and is classified by the Environment Agency as a Serious Water Stressed Area. Climate change is expected to exacerbate these pressures, with projections indicating wetter winters but increasingly dry summers and reduced summer river flows. Against this backdrop, ESW must ensure resilient water supplies while safeguarding the environment for both current and future customers. As a statutory water undertaker and formal consultee in the preparation of Local Development Orders and other planning tools, ESW supports sustainable development by promoting water efficiency, managing supply constraints, and protecting vital infrastructure and assets. We work closely with Local Authorities to ensure that planned growth can be delivered without undermining the resilience of the public water supply network. Preliminary communication Pre Planning Enquiry response 12th January 2024 The LDO applicant previously contacted ESW via a pre-planning enquiry to establish whether a mains water connection would be achievable. ESW confirmed that network upgrades would be required to supply the site and advised as follows: "Due to the water for this development being required primarily for non-domestic use, while we can agree in principle to supply the required water, this would be subject to a meeting with the applicant to clarify requirements, including instantaneous flow (litres/second), peak daily demand (Ml/day), and annual demand (Ml/annum). We would also need to understand what proportion of the demand is for fire protection and what storage would be provided. Adequate onsite water storage would be required." This response has now expired, as pre planning enquiries are only valid for six months. However, ESW has been in ongoing dialogue with the LDO consultants, and our current position is set out below. Data Centre

		The LDO proposes the use of an adiabatic air-cooled chiller system. Under this approach, potable water demand would primarily arise during peak summer conditions, as water would be required when external temperatures exceed the operational threshold of the coolers. While it is acknowledged that this demand may occur for only a limited number of weeks, or potentially days, each year, meeting it would nonetheless require ESW to reserve treatment and supply capacity specifically for data centre use. Crucially, this demand would coincide with periods when the public water supply network is already under the greatest strain due to seasonal consumption. As a result, supplying the proposed open loop system could adversely affect the resilience of the public water supply. On this basis, the use of an open loop cooling system cannot be supported. Agreement to supply potable water for open loop or hybrid cooling systems for data centres would also set an undesirable precedent for similar developments. Cumulatively, such schemes could result in demand increases of tens of megalitres per day, placing ESW's statutory duty to supply existing customers at risk. ESW must prioritise the delivery of the Government's domestic housing growth requirements, as domestic customers represent its primary statutory obligation. While the National Planning Policy Framework (NPPF) supports economic growth and the provision of digital infrastructure (Achieving sustainable development, paragraph 11 and Building a strong, competitive economy, paragraph 82), it is clear that such growth must be planled and supported by adequate infrastructure capacity (Plan-making paragraph 20 and Delivering a sufficient supply of homes, paragraph 67). The NPPF also requires the prudent use of natural resources and the avoidance of unacceptable impacts on infrastructure and the environment (Achieving sustainable development, paragraph 11, Conserving and enhancing the natural environment, paragraph 174 and 180). In light of existing water resource constraints in Essex, the use of potable water for non-essential cooling would be inconsistent with these principles. Accordingly, and to ensure a consistent and equitable approach across Essex, ESW is unable to support the supply of potable water for open loop or hybrid cooling systems for data centre developments. The Environmental Statement (Chapter 12, paragraph 12.66) acknowledges that rainfall variability has not been incorporated into the worst-case assessment; 'However, as rainfall and therefore the potential rainwater harvesting cannot be guaranteed (due to variations in weather patterns, ambient temperature etc.)' it has not been accounted for within this worst-case assessment. In the absence of this consideration, there remains uncertainty regarding the reliability and availability of non-potable water sources under variable climatic conditions. Consequently, ESW cannot be satisfied that potable water would not be required as the primary cooling water source, particularly during periods of reduced rainfall or drought. This omission limits confidence in the robustness of the assessment's conclusions regarding sustainable water use. The rainfall data referenced within the LDO documents is based on the 1941–1970 rainfall period. ESW has since engaged with the applicant's consultants and advised that rainfall modelling should instead be based on Essex specific data from the most recent 30 year period, reflecting current climate change assumptions. ESW requires confirmation that this updated dataset is the sole basis for rainfall resilience modelling, drawdown calculations, and operational assumptions, alongside local temperature projections. Taken together, the proposed development is heavily reliant on rainfall derived water sources to meet both cooling and nondomestic operational demands, and this reliance introduces a material risk to water resilience given increasing climate variability. In the absence of robust, climate appropriate modelling demonstrating sustained performance during prolonged dry periods, ESW cannot be satisfied that the development would operate without undue reliance on the potable public water supply. Furthermore, the LDO Applicant must clearly demonstrate how water requirements would continue to be met during extended drought conditions without recourse to the potable supply, including identification of any alternative non potable water sources and the mechanisms by which these would be secured and operated. ESW would, however, be prepared to consider the use of a potable water supply for a closed loop cooling system, provided the applicant can clearly demonstrate that all reasonable alternatives have been robustly assessed and discounted. This should include non-water-based cooling technologies and the potential use of treated effluent. In this regard, ESW notes the proximity of an Anglian Water Recycling Centre, which may offer opportunities for a non-potable supply. ESW continues to engage with Digital Reef (the LDO applicant) regarding the site design and proposed water usage; however, no agreement has been reached at this stage. Potable Water Demand Increase ESW's Water Resource Management Plan 24 (WRMP24) was prepared using the best available evidence and growth projections at the time, reflecting housing, population, and economic growth within the prevailing planning context; large scale data centre developments were not anticipated and were therefore not included in growth or demand assumptions. The LDO references WRMP24 within Chapter 12 of the Environmental Statement (paragraphs 12.67–12.70); however, while the Environmental Statement classifies the sensitivity of the local

		potable water supply as Medium, ESW has not formally agreed this classification. Although the applicant states that data centre demand would amount to approximately 0.45% of nondomestic potable use, ESW has advised that headroom for such uses has been eroded by increased domestic housing growth, which ESW has a statutory duty to serve; the applicant's documentation also confirms that no growth demand associated with the proposed development is included within WRMP24. Consequently, any water demand from the proposal would need to be accommodated within existing and planned supply headroom at times when the network is most constrained; unlike domestic demand, data centre demand would be concentrated over a limited number of peak summer days, intensifying supply pressures. Paragraphs 12.50 and 12.51 of Chapter 12 address construction phase potable water demand. While ESW agrees that construction would result in a temporary demand increase, we do not agree that the sensitivity or potential significance of this impact has been adequately assessed; given existing resource pressures and the importance of the potable supply, ESW considers the receptor sensitivity to be greater than Medium. Furthermore, the conclusion that the impact would be Negligible to Minor Adverse relies on assumptions regarding scale and management that have not been sufficiently evidenced and does not adequately account for cumulative demand; ESW therefore considers that the sensitivity and significance of effects during construction have been understated. The figures referenced in LDO Conditions 43 and 44, including Water Usage Effectiveness (WUE), Automatic Meter Reading, and the proposed annual potable limit of 62,560,000 litres, have not been agreed with ESW, and ESW has not committed to supplying these volumes; its maximum supply position would be significantly lower. Fire Supplies For the purposes of this response, private fire mains are defined as mains laid within a property boundary and used solely for firefighting purposes. These typically connect to private hydrants and internal hose reels. Supplies for sprinkler systems and private fire mains serving commercial or multioccupancy buildings will be metered. This may be via a single connection capable of measuring both domestic and fire use, or via separate metered connections. Section 1B.14 of the Draft Design Code allows for sprinkler tanks and pump houses on individual plots, indicating that fire suppression infrastructure is anticipated across the development. However, the Design Code does not specify tank capacities or how water is to be supplied and maintained. Clarification is required, as filling rates and schedules may affect local network capacity. ESW therefore requests confirmation of expected volumes, supply methods, and commissioning schedules. Indoor Horticulture The indoor horticultural element is projected to require up to 41,409,000 litres of water per annum, with an estimated 35,175,000 litres drawn from the potable supply after seasonal and operational variability is accounted for. While the proposed 31,250 m^3 rainwater-fed reservoir and 600 m^3 irrigation storage tanks are positive measures, there remains a risk of increased reliance on potable water during periods of low rainfall or prolonged dry weather. ESW's understanding is that all water requirements for the indoor horticultural use are to be met exclusively from a dedicated non-potable reservoir, with no routine or contingency reliance on the potable public water supply. To ensure this area of the development does not place additional pressure on the potable network, we recommend that conditions secure: Prioritisation of harvested rainwater ahead of any potable top-up (Design code 1H.9) Submission of drought resilience modelling demonstrating the reservoir's performance during prolonged rainfall deficits Adoption of high efficiency irrigation practices, including closed loop systems and moisture-controlled application, to reduce overall demand. Visitor Centre / District Heating Centre / Campus Management / Campus Security The LDO states the ambition to achieve BREEAM Outstanding for the visitor centre and BREEAM Excellent for all other buildings within the Design Code (1H.2, 1H.8 & 1H.12) for the visitor centre;

		in line with this objective, we recommend the following: High efficiency sanitary fittings (e.g., low flow taps and dual-flush WCs) to significantly reduce daily water demand Water-efficient catering equipment Greywater recycling (or use of grey water within toilets) Leak detection systems Visitor messaging promoting water efficiency. Ecology Park Planting within the Ecology Park should be drought resilient, incorporating species with low water demand capable of thriving under prolonged dry conditions. This will minimise irrigation requirements and support long term landscape sustainability. Suggested Planning Condition Due to the scale and complexity of the proposed development, it is recommended that the following conditions is attached to the Local Development Order in addition to the water usage cap mentioned in Schedule 2, General Conditions 43 & 44 (Draft LDO). No development shall commence until Essex & Suffolk Water has confirmed that a detailed method statement setting out the proposed cooling system's water requirements has been submitted to and approved in writing by the Local Planning Authority. The method statement shall aim to reduce the amount of potable water to ensure sustainable water use, reduce reliance on potable water, and safeguard local water resources in accordance with national and local planning policy and must include the following: • A timetable for implementation, specifying when water will be required (avoiding peak times) for flushing and filling the cooling system, and how water will be temporarily stored on site prior to use. • The total volume of water required for initial system commissioning, including flow rates and durations for each stage of the flushing and filling process. • The sources/volumes of water to be used, including any non-potable or recycled water options. • Details of the procedures for filling the cooling system during the construction phase, including flow control measures, and the destination of any wastewater generated during the initial flush. • A management and maintenance plan for the closed loop system, including its ongoing water requirements once operational, and measures to monitor and manage water consumption over time. The approved measures shall be fully implemented, and the development shall thereafter be operated in accordance with the approved details. We trust that the above comments are helpful. Should you require further clarification or wish to discuss any matters raised, please contact us at demand.planning@eswater.co.uk. Yours sincerely, Local Planning Liaison Officer
300	Individual	Looking at the environmental impact the data centre will have on the surrounding areas is alarming. Studies have shown residents living within a 4-5 mile radius have suffered ill health from air quality, noise pollution and poisoning of ground water. Residents will also be impacted by a considerable increase in the volume of traffic and car/lorry pollution. Whilst there is a huge drive to produce income for councils I think this has blinded us to the dire consequences of building commercial businesses in residential and green belt areas. It tears communities apart and has a huge impact on the local wildlife. The entire community is against this proposal.

301	Individual	I am writing to submit my formal response to the East Havering Data Centre Local Development Order consultation. Having reviewed the provided documentation, I have significant concerns regarding the proposal's compliance with statutory planning requirements, environmental protections, and the principles of transparent mitigation. My objections and requests for amendment are detailed below. 1. Green Belt Justification and Visual Impact The proposed campus covers approximately 218 hectares of Green Belt land. The combined floor space is proposed to reach 400,000 square metres, with the primary data centre buildings measuring up to 21 metres in height, augmented by 5-metre exhaust flues. Under Chapter 13 of the National Planning Policy Framework, constructing new buildings in the Green Belt is considered inappropriate development, which is by definition harmful. The current Statement of Reasons fails to sufficiently demonstrate the "very special circumstances" required to prove that the economic benefits outweigh the substantial harm to the Green Belt's openness and visual amenity. 2. Heritage Assets and Conservation The site is located in close proximity to the North Ockendon Conservation Area and several listed buildings. The proposals include the installation of electrical substations measuring up to 15 metres in height. Under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, the local planning authority has a strict statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas. The introduction of massive industrial architecture and towering electrical infrastructure risks permanently degrading the historic setting of these important heritage assets. 3. Financial Contributions, Transparency, and Indexation Planning obligations must meet the three strict statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. They must be necessary, directly related to the development, and fairly related in scale and kind. Undisclosed Sums: The Public Transport Contribution sum is currently undisclosed. It is impossible for the public to assess whether this mitigation is "fairly and reasonably related in scale" without reviewing the specific figures or the mathematical formula used to calculate them. I request that these figures be published for scrutiny before the Local Development Order is adopted. Indexation: Fixed financial contributions will be severely eroded by inflation over the project's lifetime. I request a universal indexation clause to be added to the Local Development Order. All financial sums, specifically the £35,000 annual officer funding, the Travel Levy, and the Traffic Management Order, must be legally linked to inflation using the Consumer Prices Index or Retail Prices Index from the date the order is adopted. 4. Transport, Highways, and Climate Mitigations In accordance with Chapters 9 and 14 of the National Planning Policy Framework, the planning system must actively secure sustainable transport and support the transition to a low-carbon future. Sustainable Transport: The site's travel plan must mandate the use of zero-emission vehicles, such as electric coaches, to meet local and national climate commitments. Car Park Monitoring: The car park monitoring report lacks precise metrics. The Local Development Order must legally define the exact data to be collected, including daily vehicle movements, peak hour entry and exit flows, single-occupancy vehicle ratios, and the utilisation rates of electric vehicle charging points. 5. Statutory Overlaps and Infrastructure Funding The proposed site overlaps with the Lower Thames Crossing Development Consent Order, which operates under a separate statutory regime governed by the Planning Act 2008. If this overlap results in the loss of existing public rights of way, the mitigation strategies must be rigorously coordinated. I request clear, legally binding guarantees detailing exactly which developer will be responsible for funding, delivering, and maintaining the upgraded footpaths, alongside mechanisms to prevent the double-counting of mitigation funds. 6. Construction Timeframe and Developer Obligations The technical documents outline a 20-year construction period operating between 2026 and 2046. Standard planning conditions are insufficient to manage continuous noise, dust, and heavy goods vehicle disruption over two decades. The Local Development Order must mandate legally binding, phased reviews of the Code of Construction Practice to ensure environmental mitigations are upgraded to reflect changing local baseline conditions over time. Furthermore, to address concerns regarding the applicant's delivery track record, robust Section 106 obligations must be tied directly to the land, ensuring any future owner or operator is legally compelled to deliver the promised infrastructure. 7. Consultation Fairness The consultation documentation exceeds 2,700 pages of highly complex technical data. Under established legal precedents for public consultations known as the Gunning Principles, stakeholders must be given adequate time and accessible information to provide intelligent consideration. The sheer volume and technical density of the material make thorough democratic scrutiny exceedingly difficult for the general public.

		For the reasons outlined above, I urge the Council to address these critical shortcomings, enforce stricter legally binding conditions, and ensure total financial transparency before proceeding with the adoption of this Local Development Order. Supporting Sources National Planning Policy Framework: National policy outlining protections for the Green Belt, sustainable transport requirements, and climate change mitigation. https://www.gov.uk/government/publications/national-planning-policy-framework--2 Town and Country Planning Act 1990: Primary legislation governing local planning and Local Development Orders. https://www.legislation.gov.uk/ukpga/1990/8/contents The Community Infrastructure Levy Regulations 2010: Regulation 122 sets out the statutory tests for planning obligations. https://www.legislation.gov.uk/uksi/2010/948/regulation/122 Planning (Listed Buildings and Conservation Areas) Act 1990: Primary legislation detailing the statutory duties of planning authorities regarding conservation areas. https://www.legislation.gov.uk/ukpga/1990/9/contents Planning Act 2008: Legislation governing Nationally Significant Infrastructure Projects such as the Lower Thames Crossing. https://www.legislation.gov.uk/ukpga/2008/29/contents Planning Practice Guidance (Planning Obligations): Government guidance detailing how Section 106 agreements and indexation should be applied. https://www.gov.uk/guidance/planning-obligations Government Consultation Principles: Guidance outlining the principles of fair and adequate public consultations. https://www.gov.uk/government/publications/consultation-principles-guidance
302	Individual	With the existing Merit Order Approach used by The National Energy System Operator, what will stop higher energy costs for the local area when the data centre comes online and potentially pushes all local usage into higher cost bands? Plus, will any new utility infrastructure costs be soaked up by the data centre or will those be passed on to the surrounding community? Also, what benefits does this provide to the local community or borough? Data centres only provide small quantity long term job opportunities and their output doesn't give a positive impact to their locality.
303	Individual	I have two issues. 1 lots of employees will need infrastructure to travel by road. How many trees or greenery we are losing 2 The project will require surge of electricity, what is provision for that
304	Individual	The Data Centre is a great idea, jobs and progress. Don't listen to the objectors, most objectors don't even know the location of the site.
305	Individual	I am actually in favour of the development, as long as the developers are held to account on providing the sustainability and ecology benefits promised in the application - preferably in line with the delivery of the first data centre buildings, not waiting decades for the final ones. It will prove a valuable source of employment and enjoyment for the local area. I do have two questions: A district heating system is noted as being provided, which local development will that system provide heat to - will it be a new housing development or existing infrastructure? Is there any impact to local residents with regards to the available power supply for the development vs the increased use of electric vehicles and therefore charging points to be installed at residential properties/public accessed areas in the vicinity?
306	Individual	I am against the Data Centre being built on environmental grounds, the amount of water needed to cool this centre is water we cannot afford to loose from our local environment. The damage to the local environment outweighs any reason for this structure being built. It will when built provide very few job opportunities in Havering and will have a negative impact on our local area and wildlife.
307	Individual	I object to the proposed Local Development Order for the East Havering Data Centre on the grounds of Green Belt policy conflict, environmental impact, and insufficiently evidenced economic and infrastructure assumptions. The proposal represents inappropriate development within Metropolitan Green Belt, contrary to NPPF Section 13. The scale of built form, including large industrial buildings and associated infrastructure, would cause substantial harm to openness and permanence. The evidence provided does not clearly demonstrate that “Very Special Circumstances” outweigh this harm. Based on the Council’s own technical responses, the development involves a contracted electrical capacity of 600MVA, confirming that this is a project of national-scale infrastructure.

		However, the Council has deferred assessment of local and regional supply impact to third parties, and no clear local resilience assessment has been presented. No energy supply contracts are currently secured. Renewable energy provision is therefore not guaranteed and may rely on REGO-backed supply mechanisms, which do not ensure physical renewable energy use. The projected operational emissions of approximately 1.09 million tonnes CO_2e per year are significant. No clear net-zero pathway or secured mitigation strategy has been demonstrated within the planning balance. Economic benefits are based on modelling assumptions rather than secured outcomes. Of the reported employment figures, only a proportion relate to direct on-site roles, with the remainder based on indirect and induced effects. No sensitivity analysis has been undertaken to test these assumptions. While biodiversity net gain is reported, this relies on future habitat creation and long-term management rather than preservation of existing ecosystems. Given the scale, permanence and policy conflict of the proposal, I do not consider that the evidence presented justifies approval via a Local Development Order. A full planning application process would allow for more appropriate scrutiny of these issues.
308	Individual	This proposal is totally out of order for the people of North Ockendon. They are totally against it. Replacing green fields is totally wrong. Such a lovely village are to be totally spoilt. How much more can the countryside be built on? Soon there will be nothing left of our England.
309	Individual	I am against this development for the following reasons It's on green belt land. We must not let this be destroyed The proximity to nearby homes and businesses is inappropriate. The local road network is inadequate during and after construction.
310	Individual	I am opposed to this data centre because 1.Traffic disruption on an already busy road b186 .Especially as the Lower Thames Crossing will also impact heavily on this area 2.The warming effect of a few degrees on the neighbor hood .Not something we want to risk with the increasing dangers of high temperatures /humidity impacts on the vulnerable , esp the elderly 3.The stress on electricity infrastructure.It is ore of a priority to use capacity to supply future housing .Developments are already being paused because of supply issues. 4.Very few jobs are involved in the construction and even fewer on an ongoing basis 5. Objection in principal to increased use of AI .
311	Individual	This is a very concerning proposal. The traffic construction and impacts on local roads, as well as noise and environmental impact of the construction is going to be a huge problem. Worse still, the water usage of the data centre is going to be immense. Ten years down the line we are going to have huge water problems to deal with from this. It's really not fair on the local residents. We don't want or need a data centre. Lastly, the loss of green space is a big concern, building on the green belt will damage our vital open spaces which are a refuge for various species. Poor bulphan and north ockendon, rural communities that are suddenly going be hugely urbanized over night. I really hope that we think twice about this proposal.
312	Individual	I do not want the data centre in Havering
313	Individual	As residents of Havering we are shocked that this has had so little consultation time. Reasons we are against it include: Loss of valuable Green Belt forever & all that encompasses..540 acres of existing farmland for example lost when we need home food production boosted. Impact on local residents of the whole spectrum of pollution issues, both during build & beyond. Impact of pollution on wider population of Havering during & after build. Pressure on local water supplies in an area where it is fragile. Pressure on top of that generated on it by all the new housing being built on so called 'grey' land! Pressure on energy supplies ..600 megawatts! The list goes on & on, yet the application is going through a 'Local Development Order'! We are not convinced at all about the counter arguments put forward to try to allay Havering Residents' concerns. We are also totally amazed & shocked by the Local Residents Association lack of publicity on this critical issue, who we have supported for many years. How can they adopt a type of planning tool for this issue which allows conventional planning permissions to be skipped?
314	Individual	I am opposed to the construction of the data centre in Havering. I am opposed to the system of a LDO as I am of the opinion an LDO lasts for 20 years if a developer is still being sought in that time. It is unfair on residents trapped in homes they are unable to sell due to the proximity of the proposal and the uncertainty. Data centres require vast amounts of electricity and water for which as a borough and country we don't have the resouces. The south of England has the least rainfall and our climate is changing. I think the developement is totally unsuitable.
315	Individual	OBJECTION TO LDO0001.26 – EAST HAVERING DATA CENTRE CAMPUS Grounds: Failure of Lawful Mitigation, Inequitable Section 106 Distribution, and Inadequate Community Engagement (North Ockendon)

		_____ 1. Introduction This objection relates to LDO0001.26 and its associated draft Section 106 Heads of Terms. It is submitted on the basis that the proposed mitigation strategy is not compliant with national planning policy, fails to meet legal tests for planning obligations, and demonstrates procedural unfairness in both engagement and distribution of benefits. _____ 2. Failure to Meet the Legal Tests for Planning Obligations Paragraph 57 of the National Planning Policy Framework requires that planning obligations must be: 1. Necessary to make the development acceptable in planning terms 2. Directly related to the development 3. Fairly and reasonably related in scale and kind The Section 106 package fails these tests: (a) Lack of direct relationship The dominant contribution (£6.924m) is directed toward a wide range of Green Belt sites distributed across the borough, many of which are geographically remote from the development site in North Ockendon . There is no evidence demonstrating: • A functional or spatial relationship between the impacts of the development and these sites • That these locations will mitigate the specific harms experienced in North Ockendon (b) Failure of fair and reasonable scale The most affected community—North Ockendon (within Upminster ward)—receives only minimal direct benefit (~£36k identified site-specific investment) , while significantly larger sums are directed elsewhere. This creates a clear imbalance between: • Impact (concentrated locally) • Benefit (distributed elsewhere) (c) Questionable necessity Many of the listed interventions (e.g. park enhancements, biodiversity improvements across distant sites) appear to be general public realm upgrades, rather than mitigation required to make the development acceptable. _____ 3. Breach of the “Rough Proportionality” Principle (Case Law) In R (Welcome Break Group Ltd) v Stroud District Council, the Court reaffirmed that planning obligations must satisfy “rough proportionality” between: • The impact of development, and • The mitigation required Similarly, in Tesco Stores Ltd v Secretary of State for the Environment, it was established that obligations must serve a planning purpose related to the development. In this case: • Impacts (traffic, environmental harm, loss of openness) are highly localised in North Ockendon • Mitigation is widely dispersed across the borough This disconnect strongly indicates a failure of lawful proportionality. _____ 4. Procedural Unfairness and Failure to Engage the Most Affected Community There is no evidence within the LDO documentation that: • Residents of North Ockendon were specifically engaged in shaping mitigation priorities • The allocation of Section 106 funds reflects community-led priorities This raises concerns under principles established in R (Moseley) v Haringey LBC, which requires that consultation must: • Occur at a formative stage • Provide sufficient information • Allow intelligent consideration and response Failure to engage the most affected community undermines the legitimacy of the mitigation strategy. _____ 5. Lack of Transparency and Spatial Justification The Section 106 schedule: • Lists numerous projects and financial allocations • Does not explain how locations were selected

		• Does not prioritise mitigation based on impact geography This absence of methodology: • Prevents proper scrutiny • Suggests potential arbitrariness in allocation • Conflicts with the NPPF requirement for transparent and justified decision-making _____ 6. Evident Imbalance in Distribution of Benefits Analysis of the Heads of Terms shows that: • The largest concentrations of funding are directed toward sites in areas such as Harold Hill, Hornchurch, Heaton and Cranham • These areas are not those most directly affected by the development By contrast: • North Ockendon (Upminster ward), where impacts are concentrated, receives minimal direct environmental investment This represents a clear failure to: • Align mitigation with impact • Ensure equitable distribution _____ 7. Conclusion For the reasons set out above, the proposed Section 106 obligations: • Fail the statutory and policy tests set out in the NPPF • Do not meet the legal standard of proportionality established in case law • Demonstrate procedural unfairness through lack of engagement with North Ockendon • Lack transparency and justification in allocation of benefits _____ 8. Requested Action It is respectfully requested that: 1. The LDO not be adopted in its current form 2. The Section 106 obligations be withdrawn and redrafted to: o Prioritise mitigation within North Ockendon o Demonstrate clear spatial and functional relationships o Provide transparent justification for all allocations 3. A targeted consultation exercise be undertaken with North Ockendon residents 4. Independent review be considered to ensure compliance with planning law and policy
316	Individual	I am in opposition to a data centre of this size being built on the Green Belt land. [redacted] and these data centres have proven to have a number of negative environmental, social and health impacts where other data centres have been built. Most concerning are the use of massive amounts of water, which can cause water scarcity or shortages of clean water for the surrounding community. The area of Havering and Thurrock are growing with more housing developments being built, which means the population is also growing, which will put further strain on our water reserves if a data centre of this scale is also going to require water constantly. I am also very concerned about the air quality. Data centres release nitrogen oxide, fine particles into the air, which increase respiratory illness incidence and severity- asthma, cardiovascular disease and premature death in nearby areas of data centres. As these data centres require so much energy, the electricity bills in the surrounding area are likely to rise as a result of its existence, which puts financial strain on residents and businesses. [redacted] but I would not do this if I knew a massive data centre pumping out nitrogen oxide into the air was there because it would negatively affect my health. There are also some very sensitive wildlife nearby, such as at the RSPB Rainham Marshes which is a reserve for many species of birds not too far away. It would not be an environmentally sound decision to build this kind of facility on Green Belt land.
317	Individual	Against this Oppose this So bad for health and costs

318	Individual	Fully in favour of building the data centre. It will bring jobs and financial gains to the area. Stop prevaricating and push ahead with the construction.
319	Individual	A datacentre will provide jobs, training and skills opportunities plus business rates for the borough. Not just that, but will likely attract further business as well as opening up land for the benefit of all residents and visitors to the proposed ecology park; continuing to celebrate our green spaces and ecology It will provide security for our data rather than being held overseas and will undoubtedly support london as a whole. This is an incredible opportunity for our borough's and our grandchildren's future and one we fully support
320	Individual	A datacentre will provide jobs, training and skills opportunities plus business rates for the borough. Not just that, but will likely attract further business as well as opening up land for the benefit of all residents and visitors to the proposed ecology park; continuing to celebrate our green spaces and ecology It will provide security for our data rather than being held overseas and will undoubtedly support london as a whole. This is an incredible opportunity for our borough's and our grandchildren's future and one we fully support
321	Individual	I strongly object to the construction of this data centre. An argument for the data centre has been given that it will promote development and employment in the area. However, it is well known that data centres are needed for the growth in AI technology which is detrimental to employment. Any economic benefits tend to be to the large global corporations that use the data and very little, if any, feeds into the local economy. There is increasing evidence that the amount of energy required to power data centres cannot be met from the power grid. In West London housing projects have been stalled as there is insufficient capacity within the grid to meet the needs of housing and data centres. The construction of these centres is undermining our climate goals and the drive to net zero. The government have commenced inquiry into the impact of Datacentres https://committees.parliament.uk/committee/62/environmental-audit-committee/news/212132/mps-to-examine-data-centres-climate-impact-as-miliband-says-future-demand-inherently-uncertain/ If this data centre is approved and the Parliamentary committee finds that data centres pose an acceptable risk to the environment then the construction may need to be halted and Havering will end up as a half-finished project. The damage to the environment and the costs of the project will have been borne and we will end up with a white elephant. In addition: according to the BBC (https://www.bbc.co.uk/news/articles/cj0ddmqpp8qo) City Hall is developing an approach that will balance the economic benefits with the environmental damage they cause. Havering Council should pause decision making on this project until both these bodies have reached a decision on the best way forward.
322	Individual	Whilst on paper this proposal is probably a good thing for the area, my concern is the amount of traffic and lorries this will create on the country lanes that are already under pressure from lorries for the solar site. The roads, particularly on the Havering side of Fen Lane are full of pot holes and are constantly being churned up by lorries that are too large for the lanes. Also the danger driving past the school at the top end of Fen Lane in the Thurrock side. How are the Council going to stop these lorries going through the village? If there is not a lorry weight restriction imposed how do you see the lorries on the bend outside the school where parents park and block the road one side leaving just one side of the road for vehicles to proceed and with a blind bend often near misses with cars, let alone an increase with heavy vehicle usage. There needs to be a clear plan of access not through Bulphan village or Dunnings Lane but as this is a Havering Council proposal that all lorries access the site via Havering roads preferably via St Mary's Lane and Clay Tye Road. There is already far too many lorries cutting through the village and roads that are not wide enough for tconstant use by these type of vehicles.
323	Individual	The proposal causes permanent and irreversible loss of high-quality agricultural land, which the Environmental Statement identifies as a "significant adverse" effect. The development results in severe landscape and visual harm, replacing open countryside with industrial-scale buildings. The ES states there would be a "loss of open rural character… significant adverse." The scheme harms the setting of Bury Farmhouse (Grade II), with the ES confirming "adverse" effects on its setting that remain significant. Residents along Fen Lane would experience significant noise impacts during construction and operation. The ES notes "construction activity noise… significant adverse… at receptors within 50 m of Fen Lane." The proposal introduces long-term construction traffic onto narrow rural roads, creating safety and amenity issues that the existing network cannot accommodate. The development represents inappropriate use of Green Belt land, conflicting with national policy and failing to demonstrate the "very special circumstances" required. An LDO is not suitable for a project of this scale and impact. It removes proper scrutiny and prevents residents from commenting on individual phases of development. The claimed economic benefits do not outweigh the substantial environmental harm identified in the ES. Given the scale of irreversible harm identified, the only appropriate outcome is to reject the LDO.
324	Individual	I do not want this datacentre built. It is being built in an area of beautiful countryside in green belt areas and will cause construction chaos for an extended period. The surrounding roads are not built to take construction traffic. The need for energy is way higher than other businesses or places locally and this is unfair. It will also use far too much water and consume resources that are needed for farms and other local industries. This project has not been requested by local residents but has been forced upon us. Please do not grant this planning application. There are plenty of other areas that are industrial already and where this will not cause such a blight on the landscape. There is no need to build this in Havering, where we are already losing so much green space.

325	Individual	I am deeply concerned about the energy and environmental impact of this development and the destruction of green belt land. Also, if ULEZ is necessary to fight air pollution, then protecting our Green Belt - the city's natural lungs - should be an even higher priority.
326	Individual	We are against this, it does not consider residents, environment or wildlife at all. It will also cause lots of disruption, is a danger to the local community and makes the local area a terror target. How much more do you want to force onto Havering residents?
327	Individual	The land used for this project could it not be used for growing food or housing both which are needed urgently data storage will not fed or house people data storage will only help people who make a profit I feel we need to get back to basics ie not run before we can walk.
328	Individual	I write as a Havering resident to register my strong objection to this LDO. Green Belt The NPPF presumes against inappropriate development in the Green Belt unless "very special circumstances" clearly outweigh the harm. That test has not been met. A multi-building industrial campus permanently transforms one of the last genuinely rural areas within Greater London. The ancillary "Ecology Park" and district heating network are mitigation for harm the scheme itself creates — they do not constitute VSC. Using an LDO further removes the scrutiny this development would face under a standard planning application. Grid stability Ofgem has disclosed that over 140 datacentre projects are seeking grid connections totalling more than 50GW — exceeding Britain's entire peak daily demand of around 45GW. The consequences are already local: housing developments in west London were paused after the grid reached capacity, with energy availability confirmed as a "real constraint" on housing growth. Adding a hyperscale campus to the east London grid compounds a problem that is already blocking homes being built for Havering residents. Heat generation The district heating network is not a community benefit — it is partial management of the waste heat the campus itself produces. A single hyperscale AI datacentre can consume as much electricity as tens of thousands of homes. The thermal burden of multiple buildings on Green Belt land adjacent to rural communities is not mitigated by supplying heat to a fraction of nearby properties. Commercial viability Green Belt harm is permanent. The commercial rationale underpinning this proposal is not. OpenAI paused its main UK datacentre project on 9 April 2026, citing high energy costs and an unfavourable regulatory environment. Microsoft cancelled datacentre leases totalling hundreds of megawatts and allowed over a gigawatt of capacity to expire, with analysts suggesting the company overestimated AI demand. The Council must not grant irreversible permission over protected land on the basis of a commercial model that leading industry players are already retreating from. Conclusion I urge the Council to refuse this LDO. The proposal fails the VSC test, poses evidenced risks to grid stability, generates unmitigated thermal harm, and rests on a deteriorating commercial case. I request this representation be formally recorded.
329	Public Relation Consultancy	East Havering Data Centre Proposals Introduction Having participated in the meetings and reviewed the committee report concerning the East Havering Data Centre (EHDC) proposals, I wish to present several observations, with particular focus on the proposed mitigations outlined in the Draft Heads of Terms (S106). It is acknowledged that the EHDC development would have a significant detrimental impact on the Green Belt land in the locality of North Ockendon. Impact Analysis and Community Concerns Although the documentation includes analysis regarding the impact on residential properties and various environmental considerations, it does not explicitly acknowledge the effects on the local community. The Section 106 agreement covers environmental and highway upgrades but fails to address residents' social and wellbeing needs. This was clearly something that residents raised at both consultation meetings. Section 106 Obligations: Proposed Measures The Draft Heads of Terms for Section 106 Obligations propose a range of interventions. These measures are located on campus or carried out throughout the borough. The latter are primarily focused on improvements to green spaces, aiming to enhance environmental quality and public access. Local Mitigations and Wider Benefits

		Among the mitigations, the creation of an ecology park stands out, together with associated access routes and upgrades to roads and footways. These improvements are intended to function as local mitigations to address the impacts of the development. However, it is important to note that they are designed to benefit not only the immediate community but also other users, including those accessing the development. Connectivity and Access Issues For example, there are adjoining routes, especially pedestrian footways such as St. Mary's Lane which should be included as part of the enhanced public access to the ecology park. Ward Councillors are concerned about poor connectivity and neglected footpaths, especially after the Upminster bus route was discontinued despite local opposition. Omissions in Green Space Provision Two Upminster parks, omitted from the S106 listings, are nearest to North Ockendon residents and located near Upminster Town Centre. This is a real disappointment as both parks are supported by Friends Groups. Upminster Park sits in the town centre, with Friends Of Upminster Park (FOUP) creating a master plan alongside the community. However, the Council cannot fund this project due to its current financial situation and dependence on Exceptional Financial Support (EFS) from the government. Interconnectivity with Existing Green Spaces It should be noted that there is currently no consideration given to the interconnectivity with other public green spaces, such as Thames Chase. This omission represents a significant oversight in the proposed mitigations. A comprehensive approach to enhancing green infrastructure should include connections to established sites, which support both ecological value and community enjoyment. Strategic Planning for Future Development A new Local Plan could fill this gap within broader development and environmental policy. Such a plan would allow for coordinated responses to the impacts of the Lower Thames Crossing (LTC), as well as to future demands for development sites. Furthermore, it would facilitate discussions around 'Grey Belt' designation, ensuring that strategic connections between green spaces are incorporated into future planning decisions. Community Infrastructure Levy (CIL) Concerns Another challenge exists in relation to the distribution and use of any Community Infrastructure Levy (CIL) arising from the development. The document does not specify how those funds will be used, and they are probably not closely connected to enhancing the local area. Neighbourhood Plan as a Solution One way to secure a greater proportion of CIL monies might be to take forward the development of a Neighbourhood Plan. If established with direct involvement from the community and forming part of the wider Local Plan once it is in place, this could help to improve trust and local cohesion which has been sorely tested through the EHDC development process. A Neighbourhood Plan may serve as a valuable guide when allocating CIL, S106, and funds from sources like LTC, Battery Energy Storage Systems (BESS), and possibly future Warley Sub Station developments. Local residents and Councillors should help develop the Neighbourhood plan. In turn determine how the CIL and S106 is spent on community projects.
330	Individual	This is addition to the file I sent you on behalf of Havering Friends of the Earth, and this is a personal objection: I have no confidence that the consultation process has been properly carried out. I know, as a Trustee at Thames Chase (whose objection you should have received) that they were not contacted by you despite their being listed in the LDO documentation. They found out about the consultation from contacts not from Havering. Who else should have been consulted and hasn't been? I also don't know whether or not you held the online evening meeting with statutory consultees, which was mentioned at one stage? Such a meeting (one hour?!) is totally inadequate for this complex proposal. We were assured (by Helen Oakerbee) that an LDO would have the same scrutiny as a traditional planning application. This hasn't happened and any decision to accept the LDO can only be invalid (if not illegal).
331	Individual	Disgusting that the council are even considering this massive destruction of valuable green belt land! Thoroughly disgusted and annoyed that the current havering council are even contemplating it!
332	Individual	I wish to formally object to the proposed East Havering Data Centre Campus Local Development Order (LDO). Whilst I recognise the growing demand for digital infrastructure, the scale and location of this proposal raise serious concerns that outweigh any claimed benefits. My objection is based on the following four key issues: 1. Environmental impact and climate considerations Data centres are among the most energy-intensive forms of development, requiring continuous power and cooling. Locating a large-scale data centre campus in East Havering risks significantly increasing local carbon emissions at a time when Havering Council has committed to ambitious climate and sustainability targets. The cumulative environmental footprint—energy use, cooling systems, standby generators, and associated emissions—is fundamentally at odds with the borough's declared climate emergency and wider national objectives to reduce energy demand and environmental degradation. 2. Strain on local infrastructure and resources The proposed development would place considerable pressure on local infrastructure that is already under strain. High electricity demand, water usage for cooling (at a time when water scarcity has been exacerbated by longer and hotter summers for the southeast of England), and the need for upgraded grid and transport infrastructure risk diverting resources away from existing residents and businesses. In particular, data centres are known to consume significant volumes of water, which raises concerns about long-term sustainability and resilience, especially against the backdrop of increasing water stress in the South East. 3. Inappropriate use of land and impact on local character

		East Havering is characterised by open land, proximity to green spaces - including land designated as green belt - and a semi-rural identity that is highly valued by residents both local and further afield. A large data centre campus would represent an unacceptable and uninvited industrialisation of the area, fundamentally changing its character and visual landscape. The scale, height, security fencing, and 24-hour operational nature of such a facility would erode the openness of the area and risk long-term harm to biodiversity, wildlife corridors, and landscape character, as well as having a detrimental impact on the ability of Havering residents to enjoy the space freely. 4. Planning process and limited local benefit The use of a Local Development Order to pre-approve this type of development significantly reduces scrutiny and limits community influence over future detailed proposals - it is both highly troubling and suspicious that Havering council would attempt to push through a development of such scale using this method.. Furthermore, data centres typically generate very few long-term local jobs once constructed and offer minimal direct benefit to local communities. This raises serious questions about whether the social and economic returns justify the substantial environmental and planning costs borne by local residents. Conclusion For these reasons, I urge Havering Council to reconsider this proposal and reject it resolutely. Alternative locations—closer to existing industrial zones and major infrastructure hubs that do not impede on green belt land currently enjoyed by Havering residents —would be far more appropriate. Havering residents should not have to bear the long-term environmental, infrastructural, and quality of life/character impacts of a development that offers limited local benefit. There is also, of course, the most important reason of all - Havering residents simply *do not want this.* It is not for the council to unilaterally force this on the local population.
333	Individual	I object to the proposed building of a new Data centre on the grounds that green land in both our borough and surrounding areas need to be protected to maintain the ecosystem of wild flora and fauna. Overworking the land will eventually damage it and it should be kept as it is. The data centre will create a large carbon footprint as it is built, there must be other alternatives that need to be explored.
334	Individual	Dear Sir/Madam, I am writing to object to the plan to build a data centre in Havering. I don’t think this is a good idea, especially because it’s meant to be built on Green Belt land. That land is supposed to be protected and not built on, and once it’s gone, it’s gone. It doesn’t seem right to build something like this there. I’m also worried about how much energy a data centre would use. These places use a lot of electricity, and it doesn’t feel like the right kind of project when there is so much focus on looking after the environment. There could also be problems for people living nearby. Big developments like this can bring more traffic, noise, and pressure on local services. It could make the area worse to live in. I also don’t see how this would really help local people. From what I understand, data centres don’t create many jobs once they are built, so it doesn’t seem like a fair trade-off. Overall, I just don’t think this is the right development for the area, and I hope the Council will think again.
335	Individual	Dear Sir/Madam, I am writing to formally object to the proposed data centre development in East Havering on designated Green Belt land. [redacted] [redacted] It is now very concerning and heartbreaking to hear that the once protected area may no longer be protected which begs the question what is the purpose of Green Belt? To my knowledge, the Green Belt was created mid-20th century to consistently be protected through successive planning frameworks. As set out in the National Planning Policy Framework, Green Belt boundaries are intended to be permanent. Furthermore, the intended building would create a number of problems and concerns [redacted]. I guess I'm also confused why a Green Belt area was chosen by the company rather than the land and space available around the UK not protected by green belt.

		There are a number of concerns but my main ones are that it will create urban sprawl, damage the beautiful green that also helps the environment. The issues with noise and pollution etc whilst building is being built, as well as concerns once the data centre is running is a huge concern to our health. The scale and industrial nature of a data centre would represent inappropriate development in the Green Belt and would cause lasting harm to the openness of the area. Nothing against data centres, I understand this is the way the world is moving but why does it have to be built in an area that was protected by green belt to begin with? It just doesn't make sense. I respectfully urge the Council to refuse this application and to protect Havering's Green Belt for current and future generations and propose an appropriate alternative to the company on land where developments are encouraged.
336	Individual	I wish to object to the proposals to build the East Havering Data Centre in North Ockendon. The Havering Residents Association was elected on a promise to protect the green belt. They have gone back on this promise. The data centre will totally destroy a large area of hugely important green belt while providing virtually no benefit to the residents of Havering and completely destroy the North Ockendon area. There is insufficient water and electric for a data centre in this area. Previous data centres have shown the surrounding area suffers from excessive heat caused by the centre. There will also be major traffic disruption for the 20 years it will take to build. The roads in Havering and surrounding boroughs are all ready in a terrible condition and 20 years of lorries etc will just make this worse. The consultation period is far too short for such a massive scheme and it is obvious the Havering Residents Association are rushing to get this in before the local elections. I feel a full public enquiry should be held to ensure due and correct process has been followed. I think the three ward councillors have shown they have no regard for the local people and have done very little to support the community. And my feeling is the senior officers who have helped rush this through should be investigated.
337	Individual	Obviously the loss of Green Belt and the destruction of wildlife habitat. Then there is the construction over an extended period of time. The data centre has no business there and should be built buy the Thames where there is adequate water and power. But additionally all these reasons I found on the internet. It really should not be built here should it! 1. Use of a Local Development Order The whole application process is unsatisfactory. We do not believe that it is acceptable to use LDOs for development on Green Belt land, and the process seems to be leading to the application being subject to less scrutiny. (We are not sure whether this is due to the LDO process itself, or the council's misuse of it, since the council has hardly any experience of LDOs – the only previous use of one was to put benches in the local market square!). Residents have had a great deal of difficulty in communicating with the council about the proposal, as the council's view is that information will not be available until the Consultation stage, so residents have not had enough time to get to understand this complex proposal. The way this process is being handled is contrary to local government guidance: 'A fundamental component of delivering and developing a LDO is to ensure that there is effective engagement with all relevant stakeholders.' (Guidance to councils on Preparing LDOs section 3.3). We get the distinct impression that the council gave the go-ahead for this proposal first and then tried to think of justifications for it afterwards (other than the financial benefits to the borough). Council leaders rely almost entirely on officers when asked detailed questions about data centres, suggesting that it is the financial benefits that are uppermost in the councillors' minds. Again, local government guidance says: 'It is imperative that LPAs are clear from the outset what the issue, or opportunity, is that they are seeking to address in an area, or on a site, through the use of a LDO' (our emphasis). Any 'benefits' will accrue to the borough and not to the local area. Residents feel they are 'expendable', and that the council leadership has no real knowledge of the existing ecology and biodiversity in North Ockendon, and no concern for the well-being of its residents. But we are not alone! The Campaign for the Protection of Rural England (CPRE) has said that it is 'appalled' that the council is looking on this scheme favourably. We believe other environmental groups will agree that it is not acceptable. The environmentalist George Monbiot has said we may use his name in support of our objections. Given all these issues, and the complexity and novelty of the LDO process, we have contacted the Environmental Law Foundation, and a Barrister has started to advise us, pro bono, on the handling of this case. 2. Protect Metropolitan Green Bent Land The planned data centre is to be sited on 490 hectares (figures given vary) of Green Belt land in North Ockendon, which is still being used for agriculture (wheat, barley etc). At the time of writing, we still do not know what the 'Very Special Circumstances' or 'exceptional circumstances' are, which have to be defined, to justify the destruction of Green Belt land. (* see also footnote).

		In another recent planning application (a Battery Electrical Storage Site in Cranham) a vague argument was used to say that ensuring a reliable provision of electricity was enough justification for building on Green Belt land. We are contesting this, through formal complaints. A similar argument may be used over the data centre, and we would reject it even more strongly (the data centre does not supply electricity!). Another argument that has been used is that data centres are 'national infrastructure' – we reject this as a justification for building data centres, and we do not accept that this point justifies building on Green Belt Land. 3. Purpose of the Green Belt Green Belt land is supposed to be characterised by its 'openness', but the 12-15 buildings on the site will be very high (15, 21 metres) and each be enclosed by 16-metre fencing. It also exists to prevent 'urban sprawl' – and yet, in our area there are a number of developments that will increasingly encroach on the openness of the countryside (Lower Thames Crossing, housing developments etc –see above). 4. Unbalanced Benefits Information Peddled to the Public When the Council leadership has described the benefits of the data centre (and the leadership is strongly in favour of it), they have put these in such a way that they would go to Havering, and not the local community. The leader has spoken of 'The reputation of Havering', and that this would be 'a catalyst for other businesses.' These 'other businesses' (and jobs – see above) would clearly not be in North Ockendon, which is a historic village. How, then, is this a 'Local Development'? Substantial business rates are also cited as a benefit, given that Havering is short of money, and we suspect that this is the primary motivation of the council leadership. However, the developers are not able to use this (financial gain) as an argument in the planning application. 5. Incorrect Location for a Data Centre We do not accept that the proposed Data Centre is an 'exceptional' case such as to justify the damage to the natural environment. The site is currently very open green space, and it is extensive, with crops, established hedges and old trees. There is a SINC (site of interest for nature conservation) on the site, several SINCs nearby, and it is next to a conservation area. This is the wrong site for such a development. We are not 'luddites' and we do not oppose data centres as such, but their siting and planning needs regulation. 6. Detrimental Impacts on Wildlife There is extensive wildlife in the area – badgers, foxes, 60-70 different species of birds, and frogs and newts in the ponds, etc. We are preparing lists of species that are important, rare, or vulnerable, but will be threatened by building an enormous data centre. Extensive building works going on for 8-10 years (the developer's estimate) will disrupt wildlife, and once driven away it is unlikely to return. 7. Misleading Representation of the connected EcoPark It is proposed, in 'mitigation' that there will be an 'ecology park.' This will cover an area which is existing green belt land, but which is inaccessible by public transport. The environmental damage from cars – supposing people will want to travel out to the site to see the 'park', which we consider unlikely! – will be very damaging. 8. Ecology Mitigation Flaws Does Not Protect Nature Part of the 'park' describes land around the perimeter of the buildings, which will have been grassed over after the construction phase and turned into paths. Is it really likely that people will want to take a stroll around 21-metre-high buildings?! It is said that whips will be planted as 'screening', but these, of course, will take many years to grow into mature trees. This also shows a complete lack of understanding of ecology and the workings of ecosystems. Ecosystems are built up over sometimes hundreds of years, and cannot be replaced in a matter of weeks. Destroying established hedges would also cause irreparable harm to wildlife and biodiversity. The claim of 100% net biodiversity gain, which Digital Reef maintains, is unreal. (Current government guidance on these issues is, we believe, harmful to the protection of nature.) 9. A Precedent Will Be Set to Destroy More Green Belt Such a huge development on Green Belt land would set a precedent and could lead to other industrial developments in the area. North Ockendon is the only part of London that sits outside the M25 – it is quiet and very green (see above).

		10. Too Close to Other Environmentally Detrimental Sites/Works The site is not that far from the Lower Thames Crossing development, and there are proposals for battery storage buildings in the area. It is downwind from Launders Lane where there is a serious air pollution problem. Altogether, these developments could be seen as urban sprawl, which – again – destroys the green belt. There are also major developments very close, across the border into Essex. These Authorities do not take these into account in their considerations. 11. Impacts on Local Roads and Travel Constructing the data centre will take, we are told, 8-10 years. The impact on the local area of hundreds of workers travelling to and from the site, not to mention dust and fumes from building works, will have a harmful effect on local residents. Local roads are narrow, and traffic already has difficulty when a large vehicle is involved. 12. Jobs and the Local Economy The claim that the proposed centre would create 2,800 jobs is misleading, as most of these will be construction workers during the 10-year (!) construction period. When the centre is operational, only a small number of staff (approximately 100, divided between management, security and operational) will be required, and we question how many of these jobs will be suitable for local people. The vast majority of those construction workers will be from outside of the area, with a need for additional rental accommodation, potentially pushing up local rents for local people. 13. Visual impact Will Be Detrimental To The Surrounding Area The plan is for fifteen warehouse-sized buildings up to 21 metres tall, surrounded by 6 metre tall security fences. There will also be generators, cables etc. There will be extra equipment on the roofs of the buildings. It is said that bunds (earth mounds, covered in grass) will be used for screening, but bunds are unsightly, and there is no way they would hide 21-metre tall buildings! The bunds will also be planted with whips, which will take many years to be effective as any kind of visual barrier. 14. Noise Pollution Data centres produce a constant 24-hour hum, which has been known to cause stress and damage to health in the US. Noise regulations are probably not sufficient to deal with this as they only refer to decibel levels (I believe_, and to ‘vibration’, not ‘humming’. The documents will need careful scrutiny on this point. 15. Benefits for Big Corporate, Not Local People The benefits will be primarily to companies (Amazon, Google et al) that handle large amounts of data. The promise of jobs is not likely to benefit local people, and we understand that most data centres outlive their usefulness in 9/10 years. What will happen to the electronics/computers etc then? Also, once the land has been built on, will it still count as green belt? 16. Dangers of Development Links with Freeport and Finances There has been mention of linking up with ‘freeports’ or even that this centre will be classified as a freeport. Freeports are notorious for being free of environmental and financial regulations and are designed primarily to increase the generation of money and profit. Even if this is no longer argued, it indicates to us the underlying motives of the council. 17. Data Centres Contribute To Global Warming Data centres contribute to global warming by producing CO2. In fact, globally, they already produce more CO2 than aircraft do, and it is anticipated that the number of data centres will increase significantly (possibly by a factor of 3) in the next 10 years, so this problem will only get worse. 18. Electricity Consumption A data centre can consume as much electricity as 50,000 homes.

		However, a 600mw data centre uses enough to power 375,000 homes or 2.4million electric cars annually* It is unlikely that the proposed data centre will get all its electricity from a renewable source, given the massive amount it will use. Claims that the data centre will be 'green' are misleading. It is not clear whether the grid can support this demand. Increasingly, nationwide, there is conflict between supplying data centres with electricity, and supplying homes. 19. Cooling The Data Centre Air conditioning is essential in these centres as they produce a lot of heat. It is likely that 40% of the electricity used will be for air conditioning. Back-up generators will be needed in case the electricity supply breaks down – will these be diesel, and therefore polluting? 20. Water Usage Most data centres use vast quantities of water for cooling. There are already complaints in this country, and across the world, that data centres are causing water shortages. It is unclear where this data centre will acquire water. Local residents already complain of not having an adequate supply! 21. Water Supply and Demand How will the demand for water, and the necessary output of water once it has been used for cooling, impact on the river Mardyke, and the fen country (one of the few such areas in London) which is nearby? Recently we have been told the cooling will be done chemically, and this raises safety and pollution issues. 22. Flooding The whole area is low-lying, and much of it is subject to flooding. With the building of a large number of large warehouse-type structures, the ground will lose its ability to absorb rainwater (and we will be getting more rain in future because of global warming!), leading to run-off and flooding problems. The very low-lying land to the east of the area (where the 'ecology park' will be?) is the only Fen land in London and is ecologically extremely valuable. 23. Loss of Farmland versus Smaller Vertical Greenhouses Given the huge amount of heat that will be generated, (and data centres are often built in countries such as Finland or Iceland to make cooling easier) it is said the heat will be used to grow produce such as aubergines and avocados, but there is no word of whether or how this will be sufficient to cool the plant. We do not see how a greenhouse can produce enough crops to replace four farms currently producing wheat. We have not been able to find out what kind of financial incentives the current landowners have been offered, but we know that some of the largest and wealthiest companies in the world (Amazon, Google etc) are likely to be the clients to whom the space is offered when the centre is built… 24. Battery Storage Risks There will be 50,000 square meters of batteries. We have seen explosions and fires at similar sites (near Heathrow) – there must be a danger of fire in a data centre that stores batteries. Batteries and computers use rare metals – so what implications are there for the mining of rare metals, lead etc? It is claimed that the site will produce green energy, but we are not at all convinced of this 25. Lifetime of a Data Centre and Waste It is also likely that the centre will only have a lifetime of 10-15 years. Thereafter a large quantity of electronic waste will have to be dealt with, and this is already proving problematic around the world. 26. Property Values Residents are already concerned about loss of value to their property, on top of the likely impact of noise, dust and security lights. However, this may not be justifiable as an objection, apparently… 27. Havering Residents' Association Reneged on Protecting the Green Belt Residents are particularly upset that the council is led by the Residents' Association which promised (e.g. in the 5-year plan for Havering) 'protecting and enhancing the Green Belt and Havering's

		open spaces and ecological assets.' 28. No Ward Councillor Engagement The three local councillors – Havering Residents' Association, Upminster Ward – have been totally uncooperative in responding to residents' requests for meetings (see above also). The councillors are falling back on the line we have heard over and over, that 'there is no information available until the LDO is published'. 29. Listed Building Destruction - LDO Development should not interfere with listed buildings. There was a Grade II listed building on the site, but it was allowed to deteriorate over the years. We now find that it was de-listed in 2022, at about the time Digital Reef first proposed this development. We are highly suspicious that this is not just a coincidence and will continue to try to get to the bottom of it. 30. Development Credentials and Expertise We have serious doubts about the developer Digital Reef, and we are not convinced that they know what they are doing, especially given recent issues over preliminary 'survey' work (digging and drilling) which took place without the developer informing the LPA, and which was illegally close to active badger setts. We also find it extraordinary that the Local Planning Authority says it has no need to look into the financial viability – or even the probity – of the prospective developer!
338	Individual	Formal Planning Objection East Havering Data Centre Campus – Local Development Order (Ref: LDO0001.26) _____ Foreword Having tried to work through the LDO/EIA documentation, it quickly became clear that it does not withstand scrutiny across all critical areas - legal, planning, technical, environmental, Health & Safety and economic. There are multiple dangers and risks associated with this ill-conceived venture, which are either downplayed, buried within or simply omitted from the LDO/EIA. Upon close and rational examination, the proposal is also bereft of tangible benefits to the Borough. We are aware that the LPA have received numerous detailed Objection Letters. These have been based on well informed researched and soundly evidenced technical facts and the conclusions are absolutely terrifying in terms of the environmental damage, risks and dangers, which are not being addressed. These people are not being paid to produce these reports. This is an environmental timebomb. This Council is being misled by the developer and the consultants they are paying for. We have seen no evidence that due diligence, risk assessment, fact checking or credit checks having been undertaken by this Council to independently validate what they are being sold/told. We entreat you to critically review, fact check and assess the many detailed technical submissions that you have received - the findings and conclusions are absolutely terrifying in terms of the risks and dangers (not only environmental), which are not being addressed or even revealed within the LDO/EIA documentation. The LPA cannot make an informed and responsible decision (or recommendation) without examining these crucial submissions and then revisiting and challenging the content of the LDO/EIA. These fabricated documents must be drastically revised and the factual content corrected, to address and rectify the numerous major inaccuracies and misrepresentations contained therein. To not do so is reckless and negligent, when the legality and ethicality of the LPAs actions are already under intense public scrutiny and investigation. It should then be put out to a fair and proper consultation, as there clearly needs to be considerably greater public engagement to address such critical issues and concerns before this can be allowed to proceed any further. 1. Introduction This submission sets out a formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO). Overriding themes are;

		• the fundamental fact that this site is not geologically or geographically suitable, viable or safe for a proposal of this nature and scale, • the unlawfully short consultation period, • the inappropriate use of LDO, • lack of engagement throughout the LDO process, • consistent used of flawed methodology and misrepresentation throughout the LDO/EIA documents. The proposal represents an unprecedented form of development in both scale and impact, involving: • Up to 600MW of data centre capacity, • The destruction of approximately 218 hectares of high-performing Green Belt land, • Up to 400,000 m^2 of built development, • A construction period of up to 20 years, • Extensive supporting infrastructure including substations, backup generation, and road modifications. It would result in the permanent industrialisation of open countryside. The proposal is fundamentally flawed in principle, unsupported by robust evidence, and procedurally unsound. It fails to comply with the National Planning Policy Framework (NPPF), the London Plan, and the Havering Local Plan, and does not meet the strict legal test required to justify development in the Green Belt. Moreover, the use of an LDO mechanism to approve such a scheme is inappropriate and undermines proper planning scrutiny. . _____ 2. Misuse of the Local Development Order Mechanism The use of an LDO in this case is a serious misapplication of planning policy and process. LDOs are intended for: • Small-scale, • Low impact, • Clearly defined developments, • Where impacts are well understood and predictable. This proposal is the opposite: • Nationally significant in scale, • Technically complex and evolving, • Environmentally contentious, • Dependent on unconsented and undefined infrastructure, • Phased over two decades with changing impacts over time. Consequences of using an LDO • Severely constrained scrutiny of thousands of pages of technical material, • Inability to reassess impacts as the scheme evolves, • Loss of democratic oversight at later stages, • Reduced ability to impose site-specific safeguards. The consultation process has compounded these issues: • Documentation is fragmented, inconsistent, and difficult to interpret, • Key information is missing or deferred, • Stakeholders have not been able to engage meaningfully. This is contrary to government guidance requiring early, transparent, and effective stakeholder engagement in LDO preparation. Conclusion: The scale, uncertainty, and risk profile of this development require a full planning application, not an LDO. _____ 3. Fundamental Conflict with Planning Policy

		The proposal directly conflicts with core planning policy at all levels. National Planning Policy Framework (NPPF) • Strong presumption against inappropriate development in the Green Belt, • Requirement to demonstrate Very Special Circumstances (VSC), • Requirement to prioritise brownfield land, • Strong emphasis on climate change mitigation, biodiversity, and sustainable transport. London Plan • Protection of Green Belt, • Promotion of sustainable transport, • Climate resilience and emissions reduction, • Healthy streets and communities. Havering Local Plan • Clear commitment to: o Protect Green Belt, o Prioritise brownfield development, o Safeguard environmental assets. The proposal departs from all of these principles simultaneously, without adequate justification. _____ 4. Substantial, Permanent and Irreversible Green Belt Harm The development would result in fundamental and irreversible harm to the Green Belt. Scale of harm • Transformation of open agricultural land into a major industrial campus, • Buildings up to 35 metres high, • Extensive hardstanding, substations, security fencing and lighting, • Loss of openness across the entire site. Impact on Green Belt purposes The site is acknowledged to make a strong contribution to: • Preventing urban sprawl, • Safeguarding the countryside from encroachment. The development would: • Extend urbanisation eastwards, • Reduce the strategic gap between settlements, • Create a clear precedent for further encroachment. Character and setting North Ockendon is: • A rural and historic settlement, • The only part of London outside the M25, • Defined by open landscapes and agricultural land. This proposal would fundamentally alter that character. Agricultural land loss • Productive farmland would be permanently lost, • No credible evidence that proposed alternatives (e.g. horticulture) would compensate. Conclusion: The harm to the Green Belt is substantial, permanent, and incapable of meaningful mitigation. _____ 5. Failure to Demonstrate Very Special Circumstances (VSC) The proposal fails to meet the high legal threshold required to justify Green Belt development. 5.1 Unproven and Mischaracterised Need • Reliance on broad, untested projections of national demand, • No evidence that demand requires:

		o This scale, o This location, o This single-site model. The assumption that only a hyperscale facility can meet demand is not justified. Distributed or smaller-scale alternatives are not properly considered. 5.2 Flawed Alternatives Assessment • Artificial constraints (e.g. requiring a single large site), • Exclusion of brownfield options, • Circular reasoning favouring the chosen site. This is not a genuine alternatives assessment. 5.3 Speculative and Non-Unique Benefits • Job creation is limited and overstated, • Economic benefits are generic and could occur elsewhere, • Benefits accrue largely to multinational operators rather than the local community. 5.4 Contradictory Sustainability Claims • Heavy reliance on fossil-fuel backup generation, • Uncertain renewable energy integration, • Speculative waste heat reuse proposals. 5.5 Misuse of “Critical National Infrastructure” Argument • Designation does not override Green Belt protection, • Does not justify concentration of risk in a single location, • Does not demonstrate site-specific necessity. Conclusion: The VSC case is speculative, weak, and legally insufficient. _____ 6. Severe Environmental and Health Impacts The Environmental Statement identifies multiple significant adverse impacts, many of which are: • Under-assessed, • Poorly mitigated, • Or not quantified at all. 6.1 Air Quality • Emissions from up to 286 oil-powered generators, • Construction dust and long-term pollution, • Inadequate assessment of cumulative and emergency scenarios. 6.2 Noise • Long-term construction noise (up to 20 years), • Operational noise from plant and generators, • Insufficient assessment of combined and peak impacts. 6.3 Ecology and Biodiversity • Loss of established ecosystems, • Habitat fragmentation, • Reliance on uncertain Biodiversity Net Gain, • Artificial replacement (Ecology Park) is not equivalent. 6.4 Water and Flood Risk • Extremely high water demand in a water-stressed region, • Increased runoff and flood risk, • Lack of confirmed supply infrastructure. 6.5 Climate Change • No robust quantification of: o Embodied carbon, o Operational emissions,

		o Backup generation emissions. This is a major omission. 6.6 Health and Wellbeing • Noise, pollution, and landscape loss, • Stress and mental health impacts, • Lack of meaningful mitigation. 6.7 Cumulative Impacts • Failure to assess combined effects with: o Lower Thames Crossing, o Major housing developments, o Other infrastructure projects - two new substations / BESS, o Launders Lane Contamination Zone All these are scheduled for the same small area at the same time. Conclusion: Environmental impacts are significant, long-term, and inadequately addressed. _____ 7. Infrastructure Uncertainty and Unsuitability The development depends on infrastructure that is uncertain, unconsented, or undefined. Power • Reliance on new substations and grid connections, • No confirmed delivery or routing. Transport • Rural roads unsuitable for sustained HGV traffic, • Incomplete modelling, • Car-dependent design inconsistent with policy. Water • Very high demand without secure supply, • Reliance on future infrastructure in a water-scarce region. Construction • Up to 20 years of disruption, • Significant cumulative impacts not properly assessed. Conclusion: Infrastructure risks are fundamental and unresolved. _____ 8. Safety, Security and Resilience Risks The proposal introduces serious and under-assessed risks: • Proximity to high-pressure gas infrastructure, • Concentration of critical infrastructure in one location, • Increased vulnerability to failure or attack, • Limited emergency access. Modern resilience principles favour distribution and redundancy, not concentration. _____ 9. Unsustainable and Short-Lived Development Model Data centres: • Have limited operational lifespans, • Are subject to rapid technological change, • Generate significant long-term waste and decommissioning issues. This raises serious questions about: • Long-term land use,

		• Environmental legacy, • True sustainability. _____ 10. Limited Local Benefit • Minimal long-term employment, • Limited integration with the local economy, • Significant local harm with largely external benefits. 11. Conflict with the National Planning Policy Framework (NPPF) The proposed development is in clear and fundamental conflict with multiple provisions of the National Planning Policy Framework (NPPF), particularly in relation to Green Belt protection, sustainable development, climate change, and environmental protection. Green Belt Protection • Paragraph 152 establishes that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. • Paragraph 153 confirms that the essential characteristics of Green Belt are openness and permanence. The proposed development, comprising large-scale buildings, extensive hardstanding, and industrial infrastructure, would cause a complete and permanent loss of openness, directly undermining these core principles. • Paragraph 154 states that inappropriate development in the Green Belt is, by definition, harmful and should not be approved except in Very Special Circumstances (VSC). • Paragraph 155 requires that substantial weight be given to any harm to the Green Belt. The proposal constitutes inappropriate development and causes substantial harm, which must be given decisive weight in the planning balance. • Paragraph 156 requires that VSC will not exist unless the harm to the Green Belt, and any other harm, is clearly outweighed by other considerations. As set out in this objection, the claimed benefits are speculative, non-unique, and insufficient. Therefore, the VSC test is not met. _____ Sustainable Development and Plan-Led System • Paragraph 11 sets out the presumption in favour of sustainable development but makes clear that this does not apply where specific policies in the Framework (including Green Belt policies) provide a clear reason for refusal. Given the strong Green Belt protections, the presumption in favour of sustainable development does not override the policy conflict in this case. • Paragraph 15 emphasises that the planning system should be genuinely plan-led. The proposal departs significantly from the Havering Local Plan strategy, particularly in relation to Green Belt protection and prioritisation of brownfield land. _____ Effective Use of Land • Paragraph 125 supports the efficient use of land but prioritises the use of previously developed (brownfield) land. No robust evidence has been provided to demonstrate why brownfield or less harmful alternatives could not accommodate this development. _____ Climate Change • Paragraph 157 requires the planning system to support the transition to a low-carbon future. • Paragraph 159 requires developments to reduce greenhouse gas emissions and support climate resilience. The proposal's: • Extremely high energy demand, • Reliance on fossil-fuel backup generation, • Lack of quantified carbon impacts, are inconsistent with these requirements. _____ Natural Environment and Biodiversity • Paragraph 180 requires planning decisions to contribute to and enhance the natural environment, including protecting and enhancing biodiversity. The proposal would result in: • Loss of established habitats, • Habitat fragmentation, • Reliance on uncertain and long-term mitigation measures. This is contrary to the precautionary and enhancement principles set out in the NPPF. _____

		Transport and Sustainable Travel • Paragraph 116 requires developments to promote sustainable transport and reduce reliance on private cars. The proposal is: • Predominantly car-dependent, • Located in a rural area with limited public transport, • Reliant on road infrastructure unsuitable for the scale of development. This conflicts directly with national policy. _____ Conclusion on NPPF Compliance The proposed development: • Constitutes inappropriate development in the Green Belt (Paragraphs 154–156), • Causes substantial and irreversible harm to openness (Paragraphs 152–153), • Fails to demonstrate Very Special Circumstances (Paragraph 156), • Conflicts with climate, transport, and environmental policies, • Undermines the plan-led system (Paragraph 15). _____ 12. Conclusion The proposed LDO: • Causes substantial and irreversible Green Belt harm, • Fails to demonstrate Very Special Circumstances, • Conflicts with national, regional, and local policy, • Relies on incomplete and unreliable unsubstantiated assumptions not backed by evidence, • Introduces significant environmental, infrastructure, and safety risks, • Misuses the Local Development Order mechanism. It should be refused in full.
339	Individual	The wanton destruction of so much Green belt , the massive water required , the disruption to local services , the shocking environmental impact both for building and running makes this an absolute no . Havering seem keen to commandeer land in a neighbouring council for their own ends . If the project is so necessary find land solely in havering , Thurrock is overwhelmed enough and needs nothing more of this kind of green impact .
340	Individual	Do you realise Data Centres breach our ECHR? Data centres can breach human rights when their operations violate privacy, environmental rights, and economic rights without adequate safeguards. Privacy violations occur when personal data stored in data centres is collected, processed, or misused by private companies without consent, interfering with the right to a private life under Article 8 of the ECHR. Legal precedents, such as Vidal-Hall v Google, have established that distress caused by unauthorized data processing can lead to compensation, and the Joint Committee on Human Rights has explicitly investigated whether private data collection threatens privacy rights. Environmental and community impacts also raise human rights concerns, as data centres consume vast amounts of water and electricity, often in rural or low-income areas, leading to air pollution and health risks that disproportionately affect marginalized communities. Recent legal challenges in the UK and the US highlight that failure to conduct Environmental Impact Assessments or manage resource usage can infringe on the right to a healthy environment and the right to clean air, with courts increasingly recognizing climate-related harm as legally actionable. • Data Protection: Laws like the UK GDPR and Data Protection Act 2018 mandate that data processing respects fundamental rights, requiring transparency, consent, and the ability for individuals to access or delete their data. • Activism and Regulation: Grassroots movements in countries like Ireland, Chile, and the Netherlands have successfully pressured governments to demand stricter regulations, citing the lack of transparency and the environmental toll of data centres. • Legal Accountability: Courts have begun to hold governments and companies accountable, as seen in the Buckinghamshire data centre case, where the government admitted a "serious error" in approving a facility without a proper environmental assessment. • Yes, limiting access to water can breach human rights, particularly under Article 8 of the European Convention on Human Rights, which protects the right to respect for private and family life. Such actions may be challenged if they disproportionately affect individuals' rights without a legitimate aim. Meaning any member of HRA, Havering or any council/planning/developer are breaking the law.

		Yes, breaching the Human Rights Act 1998 is unlawful, but only when the breach is committed by a public authority. It is unlawful for any public authority (such as government departments, courts, police, NHS trusts, or schools) to act in a way that breaches human rights, unless a statutory duty forces them to do so. Private individuals and private organisations are not directly bound by the Act to respect human rights in their private actions; you cannot take action against a private individual under the Human Rights Act 1998. However, courts and tribunals are public authorities and must interpret all laws, including private disputes, in a way that is compatible with the Human Rights Act. If a public authority is found to have breached rights, the court can declare the action unlawful, prevent the authority from acting in a certain way, or award compensation. Closed-loop liquid cooling is not a panacea. Closed-loop systems rely on a cocktail of additives such as corrosion inhibitors, biocides, and antifreeze blends to inhibit rust, reduce microbes, and reduce heat with high efficiency. Because the same water loops continuously, anything that does not evaporate or breakdown becomes concentrated. Blow-down, as little as 2% monthly bleed can carry nitrite, glycol, and heavy metals at thousands of times the limits set for surface waters. Most current systems rely on per- and polyfluoroalkyl substances. (PFAS) Communities would be well advised to require real-time water quality monitoring.
341	Individual	I am writing to submit a formal objection to the proposed East Havering Data Centre Campus Local Development Order (LDO). Having carefully reviewed the submitted documentation, I consider the proposal to be unsound, unjustified, environmentally harmful, procedurally flawed, and inconsistent with national, regional, and local planning policy. I am particularly concerned by the failure to meaningfully involve local residents in the development of mitigation measures. This omission represents a significant shortcoming in the process and undermines confidence in the fairness and transparency of the proposal. I note that this approach was confirmed as your decision during the consultation meeting, which further heightens concern regarding the exclusion of community input. Furthermore, the financial scale of the mitigation works is substantial, yet there appears to have been insufficient scrutiny or justification of these costs. Given the magnitude of the investment, it is reasonable to expect a far greater level of transparency and accountability. I also seek clarification regarding the consultation process. Specifically, it is unclear how the consultation period was extended beyond the 32 days agreed by the relevant SPC. Who authorised this extension, and was the SPC consulted or in agreement? Additionally, the timing of correspondence issued on the final day of the consultation period limited the opportunity for proper review and response which was what the residents previously requested. I personally received the letter on the 8th April, 1 day after the original consultation was closed. Finally, I note an apparent inconsistency in the approach to public health and wellbeing. In application P1234.06, “well-being” was cited as grounds for refusal in relation to Green Belt development by yourself in the position of public protection. However, in this instance, there appears to be a lack of consideration of the potential health impacts associated with a large-scale data centre, raising concerns about the consistency and integrity of the decision-making process. I am also concerned by what appear to be factual inaccuracies within the application, including the proposal for an access point via a private road. This raises serious questions about the accuracy and robustness of the submission as a whole, and whether it has been subject to adequate scrutiny by the planning authority. It is unclear whether these matters have been independently verified or simply accepted based on consultant reports. I understand that the consultants themselves have acknowledged reliance solely on the data provided, without seeking further clarification, which further undermines confidence in the reliability of the assessment. In light of the above, I expect clear and detailed responses to each of these points, alongside full consideration of the objections set out below. My objections are set out below. 1. Access Proposed from a Private Road – Legally and Practically Unworkable Section 4.13 of the Statement of Reasons confirms that the new pedestrian and cycle access on the northern boundary is proposed from a private road. The LDO cannot lawfully grant rights over land the applicant does not control. No evidence is provided of landowner consent, legal agreements, or secured rights of access. Without guaranteed access, the LDO is not deliverable, contrary to the NPPF requirement that development must be “effective and deliverable”. This alone is grounds for refusal.

		2. No Guaranteed Power Supply – The Entire Proposal Is Predetermined and Undeliverable The application repeatedly states that the site was chosen because of its proximity to Warley Substation. However: The existing substation does not have sufficient capacity. A major upgrade is required, but no planning permission exists for this upgrade. The LDO documents admit that the development cannot operate without this upgrade. No investor would commit to a £14bn project without guaranteed power, meaning the Council's claim that the proposal is not predetermined is not credible. This raises serious questions about: • Deliverability • Prematurity • Predetermination • Whether Digital Reef has the capability to deliver such a project The Council must demonstrate what due diligence it has undertaken on Digital Reef, including: Have they ever built or operated a data centre? What is their financial standing? What is their track record of delivering major infrastructure? None of this is provided. 3. No Assessment of Cumulative Construction Impacts – A Major Legal and Environmental Omission The LDO fails to assess cumulative impacts with multiple major infrastructure projects within 1km, including: Brentwood Enterprise Park St Mary's Lane Battery Energy Storage System (BESS) Warley Substation upgrade works Lower Thames Crossing (LTC) – which will close roads and divert HGVs The Environmental Statement does not include cumulative assessments for: Construction traffic Noise Air pollution Vibration Road closures Worker accommodation Emergency access Public safety This is a fundamental flaw and contrary to: EIA Regulations 2017 NPPF para 185

		London Plan Policy SI1 The LDO identifies B186 Warley Street and Clay Tye Road as the primary construction routes. These roads: Are narrow rural lanes Include a narrow railway bridge on Warley Street where two HGVs cannot pass at the same time Have no capacity for thousands of HGV movements over 17 years Are already used by agricultural vehicles, school traffic and local residents The Transport Assessment fails to address these constraints and underestimates risk to life, congestion, noise and air pollution. This is unsafe and unacceptable. 4. Ecology Park – No Maintenance Plan, No Staffing, No Guarantees, No Evidence of Need The LDO proposes an “ecology park”, but: No maintenance plan is provided. No funding mechanism is secured. No staffing numbers are given. No legal conditions ensure long-term management. No visitor usage survey has been undertaken. No evidence shows that residents would use a park surrounded by 21-metre-tall warehouses, security fencing, and lighting. What conditions will be imposed on the developer What happens if the park is unused or neglected? Whether the land could later be reclassified as “under-utilised” and used for data centre expansion Thames Chase, a 1,000-acre woodland, is 1km away and already provides high-quality recreation. There is no justification for creating a new “park” in an industrialised setting. This raises the concern that the “ecology park” is simply future expansion land once the LDO expires. 5. Noise, Light, Pollution and Human Health Impacts 5.1 Noise impacts understated The External Lighting and Noise Assessments rely on baseline measurements taken only at peak traffic times, masking the true contrast between current rural quiet and future 24/7 industrial noise. Data centres generate: Constant low-frequency hum Cooling fan noise Emergency generator testing HGV movements Security operations These impacts are permanent, 24/7 and incompatible with rural residential areas. 5.2 Light pollution Despite being classified as an E2 rural environmental zone, the site will be lit with:

		8m columns Bollard lighting Security lighting Building façade illumination This contradicts the ILP guidance and will destroy the area's dark-sky character. 5.3 Air quality and CO_2 emissions The development will: Consume enormous electricity volumes Generate significant CO_2 emissions Require diesel backup generators Increase HGV traffic for 17 years The Health Impact Assessment fails to quantify these impacts. 6. Environmental Impacts: Water, Electricity, Heat, CO_2 Emissions The LDO documents acknowledge but do not quantify: • Water consumption Data centres of this scale typically use millions of litres per day for cooling. No assessment is provided of impacts on: Local water supply Drought resilience River Mardyke hydrology Aquifer depletion • Electricity consumption A campus of this size could require hundreds of megawatts, equivalent to a small city. This contradicts: Havering's climate commitments London Plan Policy SI2 National carbon reduction targets • Heat generation No assessment is provided of: Heat island effects Impacts on local microclimate Thermal pollution Fire risk • CO_2 emissions

		Construction and operation will generate vast emissions, yet the LDO claims “net zero” without evidence. 7. Technical Failures in the LDO Evidence Base 7.1 Flood Risk Assessment The FRA acknowledges: Parts of the site lie within Flood Zones 2 and 3 The Mardyke River requires diversion and engineering works The site contains 23 ponds and seasonal ditches Yet the LDO claims flood risk is “manageable” without providing detailed designs. 8. Noise Impacts – 24/7 Industrial Hum Not Assessed Properly The noise assessment: Only measures current peak traffic noise, not night-time baseline levels. Does not assess low-frequency hum from cooling systems. Does not assess cumulative noise from multiple data halls. Does not assess emergency generator testing. Does not assess security vehicle movements. Residents will experience constant 24/7 industrial noise, fundamentally changing the rural character of North Ockendon. 9. Visual Impact – 21m-Tall Warehouses in Green Belt The buildings will be: Up to 21 metres tall Surrounded by security fencing, lighting, cameras, and access control Visible for miles across open countryside This is industrialisation of Green Belt, contrary to: NPPF Chapter 13 London Plan G2 Havering Local Plan Policy 27 The “very special circumstances” (VSC) claimed do not outweigh: Loss of openness Loss of agricultural land Loss of wildlife habitat Loss of rural character Loss of public amenity 10. Wildlife Impacts – Irreversible Loss of Habitat The LDO claims habitats can be “recreated”, but:

		The site currently contains established ecosystems developed over centuries. These cannot be recreated artificially Ecosystems take decades or centuries to form. Species displaced by construction do not return. Lighting, noise, and human activity will permanently degrade the area. The ecology park cannot compensate for the loss of 218 hectares of farmland, hedgerows, and ditches. This is contrary to: Environment Act 2021 Biodiversity Net Gain principles London Plan G6 11. Equalities and Health Impact Assessments – Significant Gaps The Equalities Impact Assessment and Health Impact Assessment both: Fail to assess impacts on North Ockendon residents, the closest community. Focus on borough-wide benefits while ignoring localised harms. Do not assess impacts on elderly residents, children, or disabled people living near construction routes. Do not assess mental health impacts of 17 years of construction. This is contrary to the Public Sector Equality Duty (PSED). 12. Social, Economic and Community Impacts 12.1 Employment claims exaggerated Data centres are low-employment facilities. Most roles are: Security Maintenance Remote technical support The LDO does not provide evidence for the claimed job numbers. 13. Lack of Local Mitigation – £6.9m Is Inadequate for a £14bn Project The proposed mitigation package: Is not targeted at the local community. Provides no improvements within 1km of the site. Is only £6.9m, which is 0.057% of the project value. Does not address the 17-year construction period. A development of this magnitude should include local mitigation, not only borough-wide measures. There is no provision for: compensation for loss of property value, buy-out options for residents within 1 km, council tax rebates during construction,

		local infrastructure improvements, local environmental mitigation. Residents were not consulted on mitigation options. You personally confirmed that this was a deliberate decision. This undermines public trust and procedural fairness. 14. Property Devaluation The LDO does not assess: Loss of rural setting Noise Light pollution Traffic Industrialisation Security presence Visual impact Increased risk of terrorism due to critical national infrastructure These factors will significantly reduce property values, yet no compensation mechanism is proposed. 15. Green Belt Policy – No Valid Very Special Circumstances (VSC) The NPPF is clear: Harm to Green Belt must be given substantial weight. The claimed VSCs: Are generic Are unproven Are not site-specific Do not outweigh the permanent loss of 218 hectares of Green Belt Economic benefits are speculative and cannot justify irreversible environmental harm. The proposal would permanently destroy 218.8 hectares of Green Belt, contrary to: NPPF paragraphs 147–151 London Plan Policy G2 Havering Local Plan Policy 29 The claimed benefits, business rates, jobs, “innovation”, borough-wide mitigation do not meet the legal threshold for VSC. Green Belt exists to: Prevent urban sprawl Safeguard the countryside Preserve openness Protect wildlife habitats Maintain separation between settlements This development fails every one of these purposes. Conclusion

		For the reasons set out above, the LDO is: Undeliverable Environmentally damaging Legally flawed Contrary to planning policy Unsupported by evidence Harmful to local residents A major industrialisation of Green Belt without justification I therefore request that the LDO be refused in full and look forward to your full response to all these points.
342	Individual	This is too big a development that will swallow up a huge area of green belt land. I hoped that Havering Council would have put the environment first but I am disappointed. The noise alone generated by the data centre could be a real problem for residents. Once again the SE is being trashed. We have only just begun to recover from past industrial blights and now this. On behalf of future generations shame on the Council.
343	Individual	I object to the proposed data centre development.
344	Individual	Please do not build this data center, the detrimental effect to the environment is unacceptable, especially as it is on greenbelt land
345	Individual	I am not in favour of a data centre being built in Havering. I feel that the council is guilty of short termism. Any benefits the London Borough of Havering residents may gain from the data centre are short term whereas the disadvantages are long term and should be given far more weight. The claim that the construction of the data centre will generate a minimum of 9,000 jobs across Havering due to construction, operation and the wider supply chain seems very unlikely and there is no real evidence given for this that I could find. Most of these jobs must be during the construction phase only so a short term benefit leaving those employed out of work at the end of this stage of the project. https://www.havering.gov.uk/regeneration-3/east-havering-datacentre-ecology-park The construction and operation of the data centre would seem to be in contradiction to the council's climate change action plan. The dangers of climate change need concrete action not lip service. https://www.havering.gov.uk/downloads/file/6573/climate_change_action_plan_2024_to_2027.pdf The information released by the council about the data centre does not create a balanced picture of the pros and cons. It doesn't mention the impact on the environment or the demands the data centre will place on electricity and water supplies. The image used to promote the project gives no clue as to the size or spread of the data centre sheds. I feel that the purely positive advertising of the data centre is likely to mislead Havering residents, reduce the likelihood they will research and respond to the consultation and decrease the number of negative comments about the proposal. Ultimately residents will have much to feel aggrieved about if the data centre development goes ahead. https://www.havering.gov.uk/regeneration-3/east-havering-datacentre-ecology-park From what I gathered at the presentation [redacted] the data centre is intended to use power from the grid but will have back up generators to rely on should the grid not be able to supply the electricity needed. Generating the electricity needed will create a huge amount of carbon emissions. If the back up generators are needed there will be further pollution in the data centre's immediate surroundings. Why is the Havering seemingly trying to rush through the LDO for the data centre when "the Mayor of London is developing a new, stricter policy for data centres in the upcoming London Plan (March 2026) due to concerns that approximately 60 planned, energy-intensive facilities could cause significant carbon emissions and strain the electricity grid."? Surely it would be more responsible to wait for a London wide policy. Other areas with data centres have had problems with domestic electricity and water supplies. Every summer in Havering we are told about water shortages. It seems irresponsible, and a very real disservice to Havering residents, to be building a data centre that will greatly increase water shortage problems. The 20 year duration of the LDO seems very long, much longer that seems to be the norm. I am not sure why this is necessary. It potentially leaves residents local to the data centre in limbo for a protracted period of time should the data centre build not progress in a timely manner. Havering residents living in the immediate vicinity of the data centre will be subjected to noise pollution, heat pollution and possibly emissions from diesel generators, quite apart from the eye

		sore of huge sheds where they currently have open fields. This is bound to have a detrimental impact on their health and quality of life and the value of their properties. No mention of this or any compensation they might be due has been made. It is alarming that the council is willing to impact residents in such a harmful way, apparently without giving it a second thought. I feel that councillors are betraying the trust of those who voted for them.
346	Greater London Authority	Thank you for consulting the Greater London Authority (GLA) on Havering Council's proposals to make a Local Development Order (LDO) to facilitate the development of a data centre campus and associated development. This response sets out the Greater London Authority's (GLA's) strategic planning comments based on the submitted supporting documents. Site and proposals 1. The site for the proposed LDO covers approximately 218.8ha of agricultural land north-east of North Ockendon, bound by Fen Lane to the south and Ockendon Road to the west. Warley substation is located just beyond the northern site boundary. The entire site is designated as Metropolitan Green Belt. Other relevant designations include the Fairplay Farm Site of Importance for Nature Conservation (SINC) (Grade 1 borough importance) in the northern part of the site, and Flood Risk Zones 2 & 3 towards the eastern boundary. The North Ockendon Conservation area lies to the west of Ockendon Road. 2. The proposed LDO would enable up to 400,000sqm of development including 340,000sqm data centre floorspace, 50,000sqm indoor horticulture floorspace, a visitor centre, energy centre, management/security buildings, associated infrastructure and an Ecology Park. Associated development including staff and visitor parking, creation of roads and accesses, overground and underground servicing, plus highways works on Fen Lane and Ockendon Road are also proposed. The LDO process (and Mayor's remit) 3. The Mayor of London, in his role as providing a strategic planning authority for London, has planning powers to comment and intervene in certain planning applications that are referred to him, as set out in the Mayor of London Order 2008 (the Order). 4. A planning application proposing development of this scale and nature would usually be referable to the Mayor under the Order. In this instance, however, the proposals are coming forward as part of a Local Development Order (LDO). An LDO is a legally binding document which grants planning permission for specified types of development in defined locations, without requiring separate planning applications. The power to make an LDO rests with the Council in its capacity as Local Planning Authority, under the provisions contained in the Town and Country Planning Act 1990, as amended. 5. As the LDO is not a planning application, it is not referable to the Mayor of London under the Mayor of London Order, and the Mayor therefore has no formal remit in the determination of this proposal. As a key consultee, it is however requested that Havering Council take the GLA's following comments into consideration when deciding whether to make the LDO, including the GLA's recommendations on amendments and further information that should be submitted prior to determination, and additional conditions that should be attached to any LDO if it is made. Land use principles Green Belt 6. The site lies within the Metropolitan Green Belt which is afforded the strongest protection against inappropriate development by national policy, London Plan policy and Havering Local Plan policy. 7. The LDO supporting documents include a green belt assessment which concludes that the site is not 'grey belt' as defined in the NPPF, as it strongly contributes to purposes a) and b) of the Green Belt as set out in NPPF paragraph 143. The GLA concurs with this assessment and considers the site to be Green Belt, rather than grey belt. 8. The development does not meet any of the exceptions to inappropriate development on Green Belt listed at paragraph 154 of the NPPF. The development therefore constitutes inappropriate development. The NPPF at paragraph 153 states that inappropriate development is harmful to Green Belt by definition and should not be approved except in "Very special circumstances". Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Harm to Green Belt 9. The proposed development would involve the construction of eight buildings, ranging in height between 18m AOD and 35m AOD, with a total footprint of up to 400,000sqm, alongside associated urbanising development such as car parking and hardstanding. The land to be built on is currently open and largely free of development. The development would therefore represent a

		significant and clearly perceptible change. The development would result in the encroachment of substantial and permanent built development into open areas of land, resulting in physical reduction of openness and the increased visual prominence of built development on the site. 10. Furthermore, the change in the nature of the use of the site from a low intensity agricultural use to a more intensive form of development involving an estimated 517 daily vehicle trips each way, would generate increased activity and traffic to and from the Green Belt, and appear urban in character which would further harm the openness of the Green Belt. 11. The development would therefore substantially reduce the openness of the Green Belt, and by introducing urbanising development on the Green Belt, it would significantly impact on the purposes of Green Belt, three of which are to check urban sprawl, prevent neighbouring towns merging into one another, and to assist in safeguarding the countryside from encroachment. Very special circumstances 12. The applicant identifies that very special circumstances (VSC) exist for the proposed development which clearly outweighs the harm to Green Belt. The applicant's VSC case is, in summary: - There is a national need for hyperscale data centres, and an identified London-wide need; - A review of other available sites has been undertaken, but no other sites have been found to be suitable; - The proposal would bring about significant economic benefits for the UK, London and Havering; - The proposal would bring about enhancements to Green Belt and biodiversity gains, which would not have been possible without the development. 13. In relation to the need and location, this is considered in further detail below, but in summary the GLA accepts that there is a need in London for new data centre capacity to meet ongoing demand, support its economy, and London's status as a world leader in the digital economy. The applicant has submitted a robust case to demonstrate that the proposed site is the only suitable and available site for a hyperscale data centre of this size/proposed capacity, taking into account the availability of the power required (noting the electricity demand of up to 600MVA), the land availability, and the proximity to relevant Availability Zones to take advantage of low latency. 14. In relation to economic benefits, it is accepted that the large data centre would support London's economy and would generate significant economic benefits for the borough of Havering. The Government noted, in its discussion of the proposed reforms to the NPPF, that "Data centres produce an estimated £4.6bn in revenue each year in the UK (2021) and are forecast to support a UK tech sector worth an additional £41.5bn and 678,000 jobs by 2025." [https://www.gov.uk/government/consultations/proposed-reforms-to-the-national-planning-policy-framework-and-other-changes-to-the-planning-system] 15. The applicant has submitted evidence that a biodiversity net gain would result from the proposed development. The proposals, despite involving a significant amount of built development, would enhance the biodiversity value of this cultivated site by introducing parkland, a significant number of new trees and habitat. The recreational value of the site would also be enhanced through opening the park to public access and providing a visitor centre. It is accepted that the primary development proposed is the catalyst to these enhancements which are unlikely to be brought about by themselves. 16. Additionally, comments on the waste heat opportunity are offered below. GLA officers consider that the waste heat produced by the proposal could be a significant benefit, and this could also contribute to very special circumstances if this is appropriately secured and harnessed. Conclusion on Green Belt 17. In conclusion, the proposal would cause substantial harm to the openness of the Green Belt and is inappropriate in principle, meaning that very special circumstances need to be demonstrated to outweigh the harm. The GLA accepts that there is a need for additional data centre capacity serving London, and given the limitations on available sites, it is accepted that this site on Green Belt is currently the only suitable site for a data centre development of this scale. The proposal would make a significant contribution to meeting data centre demand, and in turn, a significant contribution to London's economy. The biodiversity benefits brought about the proposals are acknowledged. Taken together, these items could amount to a case for very special circumstances in this case, although a stronger case could also include the proposals' significant waste heat output, as long as appropriate steps are taken to ensure this is properly harnessed to support wider development and growth. This matter is considered in further detail below. Data centre development Relevant planning policy, national and regional context

		18. The National Planning Policy Framework (NPPF) (December 2024), requires local planning authorities to identify suitable locations, and make provision for data centres as part of planning for clusters of data-driven, creative or high technology industries to support a modern economy. It is noted that in September 2024, the Government classified data centres as 'Critical National Infrastructure' given their importance to the UK's economy. A National Policy Statement of Data Centres is expected shortly. 19. The London Plan (2021) currently has no specific policies relating to data centres, and nor does the Havering Local Plan (2021). 20. The "Towards a New London Plan" document (which sets out issues and considerations for the next London Plan) contains a recognition that data centres play a vital role in London's economy, but they can also bring significant challenges including their impact on electricity network capacity, disruption due to "stretch" connections, and the risk of crowding out housing delivery or other industrial uses. Noting these challenges, the document indicates that a more strategic approach to planning for data centres and better coordination of locations will be promoted in the next London Plan. Need and location 21. It is noted that this proposed hyperscale data centre is coming forward in the absence of an agreed strategically planned approach to the location of additional data centre capacity in London, since the relevant planning policy framework is not yet in place. In the absence of this, in terms of planning for suitable locations for new data centres, the GLA would expect the following factors to be considered, inter alia: • The availability of network electricity and water supply capacity, and noting any competing requirements to meet local housing, employment and other infrastructure needs; • The extent to which the proposal can contribute to local heat recovery opportunities; • The availability of land without compromising the supply to meet local housing/employment/infrastructure needs. 22. The applicant's supporting documents sets out the case that: • There is a substantial and urgent need for hyperscale public cloud capacity (such as provided by the proposed data centre) in the London cloud region, with severe supply constraints and limited power availability. • The proximity of any new data centre to the public cloud region and its users is a key consideration in evaluation of site suitability. • Based on latency and operational requirements, the preferred location for new deployment for a hyperscale data centre to serve the London Cloud Region would be as close as possible to the Slough Availability Zone (AZ), as this is the principal location for data centre operators. • A new hyperscale data centre or AZ will need to be located with good access to existing fibre connections (and thus the wider fibre network), connectivity hubs and network points (such as the London Internet Exchange). This is necessary for transmission of data to and from end users and between AZs. • Digital Reef has secured 160MVA by 2029 and 600MVA by 2033 from Warley GSP. No other GSP within an acceptable distance of the Slough AZ can deliver equivalent capacity. Only the East Havering site meets locational power, fibre and scale requirements. 23. The GLA recognises that whilst there is significant uncertainty over the scale of demand for data centres, current forecasts indicate that demand for new capacity will significantly outstrip supply in the UK and London region in the next few years. The UK Compute Roadmap 2025 forecasts a national requirement of at least 6GW of AI-capable infrastructure by 2030 (triple the current estimated capacity of 2GW) [https://www.gov.uk/government/publications/uk-compute-roadmap/uk-compute-roadmap]. As London is the UK and Europe's largest data centre market, London is expected to absorb a significant share of this growth. This is illustrated by the fact that National Grid have planned to connect 5-6GW of data centre connections in the London region over their T3 Business Plan (2026-2031) [https://riiot3.nationalgrid.com/document/30141/download]. 24. As set out in the applicant's submitted Need Assessment, recent appeal decisions for data centre development in the London region have confirmed and quantified the need for additional capacity. For instance, as part of the appeal for the data centre in Abbots Langley [Appeal Ref: APP/P1940/W/24/3346061], the appellant forecast that London has the need for 3,824MW of data centre capacity between 2024 – 2029 of which 95% is for public cloud data centres, which the inspector did not dispute . The applicant's Need Assessment estimates that there is currently c.1,559MW of secured data centre capacity serving the London cloud region. 25. To date, hyperscale data centre development in London has been limited by land constraints and power availability, amongst other things, and there are notable power supply constraints in West London, closer to the Slough AZ. The proposed East Havering Data Centre Campus represents a significant opportunity to establish new hyperscale capacity and potentially a new AZ to serve the London Cloud Region. Its potential scale means that the campus has the potential to become a new AZ in its own right (although this is dependent on the proposed campus attracting cloud providers as opposed to other workloads such as AI training or secure data storage). 26. The GLA recognises this opportunity to significantly contribute towards an identified need, and supports the proposals in principle in this regard, however, the matters raised below regarding the impact of energy absorption and water capacity must be taken into account by the Council in its decision on whether to make the LDO.

		Energy consumption and local network impact 27. At full capacity, the proposed data centre is expected to require up to 600MVA of electricity capacity per annum. This is a substantial amount of energy which could be equivalent to the powering of over 150,000 homes. It is understood that Digital Reef has secured agreement from UKPN to supply this amount of power by 2033 from the Warley GSP. However, it is unclear how the Council, developer and UKPN has considered the implications of the proposal on broader energy capacity for the borough's wider growth and decarbonisation priorities, and those of neighbouring boroughs/districts. The absorption of up to 600MVA of electricity capacity by the data centre could have a major impact on the borough's ability to accommodate future growth unless sufficiently planned for and mitigated. 28. The following mitigations are therefore recommended to be appropriately secured as part of an LDO: • A contribution towards the preparation of a Phase 2 Local Area Energy Plan, to enable Havering Council to properly identify and mitigate any risks the proposal may pose to the area's future energy needs, including its capacity for growth. • Annual reports on energy usage, and in particular utilisation against the connection agreements, to enable the Council to have a transparent understanding of broader electricity capacity and to enable better mitigation in terms of the borough's future energy needs. • Minimum Power Usage Effectiveness standards for each building. • An obligation to submit to Havering Council any further connection requests for electricity and water capacity associated with the LDO proposals, to enable the Council to properly monitor the local capacity impacts of the LDO. • A commitment to maximising energy supply from renewable sources. Where Power Purchase Agreements are used, for instance, the LDO could stipulate standards that either comply or exceed the Carbon Neutral Data Centre Pact in this regard [https://www.climateneutraldatacentre.net] 29. In relation to electricity connection reform (referred to at paras. 2.40-2.46 of the Statement of Reasons), it should be noted that Ofgem and DESNZ have recently announced urgent further connection reform of the demand queue, with a specific focus on Data Centres [https://www.ofgem.gov.uk/call-for-input/demand-connections-reform]. The London region features a significant data centre connection queue, which may be impacted by proposals to re-order / prioritise / deprioritise data centre connections in order to curate a more viable queue. Havering Council should seek protections within the LDO should the agreed connection offer with UKPN be adversely affected if reforms lead to changes in the agreed connection dates of 2029 and 2033 (through Ofgem or SoS exercising their powers under the Planning and Infrastructure Act) [https://www.gov.uk/government/consultations/accelerating-electricity-network-connections-for-strategic-demand/]. 30. It is acknowledged that the proposal's waste heat could be a significant opportunity to support growth and reduce reliance on existing electricity networks. This opportunity must be properly harnessed and secured in order to be fully realised, and this is addressed further below. Waste Heat 31. The proposed Data Centre Campus will generate an estimated 200 MW of low grade waste heat when fully operational, making it one of the single largest potential waste heat sources in London and the wider region. The scheme acknowledges its responsibilities under London Plan Policies SI2 and SI3 and has commissioned a Veolia-led heat network feasibility study to consider options for exporting this heat in future. 32. While the applicant has made progress in designing the development to be "heat export compatible" and the feasibility work clearly demonstrates that large scale heat recovery is feasible, the proposal still risks failing to meaningfully address the site's strategic waste heat potential. At present, the proposed 50,000 m^2 heated horticulture building has an annual heat demand equating to 2% of the potential heat load. 1% of waste heat will also be utilised to heat onsite communal areas, leaving 97% of surplus heat requiring an external heat off-taker. Without stronger guarantees and clearer engagement with the heat network market, the scheme may fall short of supporting the decarbonisation of heat for thousands of homes and key public buildings in Havering. 33. The Veolia study identifies high demand clusters in Upminster, Hornchurch, Romford, Harold Wood and Rainham, with the potential to supply 10,000+ homes and major public sector buildings (including Queen's Hospital) where a heat network provider can step in. To enable future heat export, the onsite energy centre and supporting infrastructure must be sized with sufficient capacity to allow a future Energy Services Company (ESCo) to connect. This includes ensuring pipe routes, pumping systems, and plant areas are capable of being expanded without significant reengineering. 34. While the feasibility study identifies technical options, there is no clear evidence of active engagement with: • Licensed heat network operators • Private ESCo market participants

		• Offtake customers (e.g., housing developers, NHS estates, leisure facilities) 35. The feasibility study emphasises the need for future stakeholder coordination, but does not demonstrate that such negotiations or market testing have yet begun and this would likely inform the expected type of heat network, the demarcation of ownership boundaries between a heat network developer and the data centre, and expected energy centre sizing. 36. The energy and sustainability statement identify that heat loads are over 3km from the site with challenges presented by overall viability of a future scheme. Considering additional infrastructure contributions as part of the S106 agreement towards a future heat network may be critical to unlocking the business case for delivery of a heat network to identified heat loads, and providing thousands of homes with affordable decarbonised heat. 37. To ensure this nationally significant heat source is not locked in or under utilised, several matters must be secured through the LDO and through any future detailed permissions. These include: • Secure binding heat export requirements within the LDO - The current provisions to ensure the scheme is heat export compatible for the horticulture centre should be embedded as binding requirements in the LDO, and additionally the Council should consider binding requirements to provide off-site heat export at an agreed threshold. • Consider additional S106 infrastructure contributions towards the development of a future heat network. • Allow flexibility to expand the Energy Centre footprint - The LDO requires the energy centre building footprint to not be more than 3,300 square metres, however, further flexibility is encouraged to allow for future energy centre expansion, to more feasibly allow for export (not only to the horticulture load). Oversizing the energy centre and maintaining pipe corridors is essential to meeting future district heating demand, and providing space will make this more attractive to the heat network industry. • Require demonstrable engagement with the heat network sector – The LDO should require the applicant to demonstrate active commercial engagement with the heat network sector, including discussions on commercial structures, delivery models, and risk allocation. Water consumption 38. The data centres would require up to 96,245,820 litres (l) of water / per annum (pa) for data centre cooling if operating at 100 % IT load (i.e. all servers operating at maximum capacity). However, as it is not anticipated that 100% capacity would ever be achieved, the potable water usage is estimated to be 62,560,000 l/pa (based on the data centre operating at 65% capacity). The LDO would include a condition limiting the use of potable water for cooling to 62,560,000 l/pa (equivalent to domestic water use of approximately 462 average UK dwellings). 39. In addition to the data centre use, it is anticipated that there could be the additional use of up to 41,409,000 l/pa for irrigation within the indoor horticulture use, and up to 17,453,350 l/pa for domestic use (i.e. water used by employees for drinking or sanitary purposes). These uses combined would be 58,862,500 l/pa (equivalent to domestic water use of approximately 462 average UK dwellings). 40. The proposed development would incorporate rainwater harvesting into the design of the proposed data centres to reduce the reliance on mains water. It is estimated by the applicant that between 43,786,752 and 51,094,800 l/pa (c. 45 to 53 % of total proposed data centre cooling requirement) could be collected through rainwater harvesting. Whilst this has not been accounted for in the worst case estimate of potable water requirements, due to uncertainty over rainfall, in most years collected rainwater would be expected to significantly reduce the reliance on mains water, which is strongly welcomed. Measures should be put in place as part of the LDO to require opportunities for harvested rainwater to be maximised, and for cooling to be carried out using rainwater/waste water first, before potable/mains water is used. 41. The site is within the water supply area of Essex and Suffolk Water, which has indicated in its 2024 Water Resource Management Plan that there is a water shortage across its area, albeit that measures are being undertaken to improve this. The introduction of a significant new consumer of non-domestic water needs to be considered in this context, and particularly in relation to how this affects local water supply, and the ability to achieve future growth in housing and other development. At the least, the applicant should demonstrate that it has permitted connections from the relevant supplier for the amount of water required, and Havering Council should satisfy itself on this point prior to making an LDO. 42. Furthermore, the LDO should make it clear that any proposed application to the Environment Agency for an abstraction license associated with the LDO proposals must be subject to written notice to, and approval by, the Council. 43. Further comments on water, flood risk and drainage are included in the Environmental Sustainability section below. Design 44. It is noted that development permitted by the draft LDO must comply with the requirements set out within the East Havering Data Centre Campus LDO Design Code.

		45. The site layout appears logical in concentrating the Data Centre Campus in the heart of the LDO area, with the open landscaping of the ecology park and meadows surrounding it. Woodland buffers are also proposed to the periphery of the data centre buildings, along with mounds created from development spoil. While these measures may help to mitigate visual impacts to the wider Green Belt to some degree, the height of buildings (up to 35m AOD) and extent of development proposed in an undeveloped, largely flat and agricultural setting, will result in a significant change in character, particularly in the immediate setting but also in mid and long range views. 46. While the Design Code includes details of surface materials for the data centre buildings, there is little detail on the architectural intent behind the proposals, and how the form and scale of buildings will be designed to respond to the surrounding landscape. Before making an LDO and considering the final Design Code, the Council should request a series of indicative rendered views at short and mid-range, to demonstrate how the scale and materiality of buildings will appear, taking account of tones and reflectivity of materials. 47. Noting the potential uncertainty on the long-term future need for large data centres as technology and the market evolves, the future adaptability of the buildings should be considered. A strategy for adaptation and/or dismantling and restoration of the land should be designed into the proposals and secured as part of the LDO. Transport Site location 48. Reflecting the site's rural location, access by active and sustainable modes of transport is very limited. Footways are only provided along the built-up area of Ockendon Road and in limited sections of Fen Lane. The site's PTAL (Public Transport Access Level) is 0 for the vast majority of the site, and 1a-1b around the western boundary in North Ockendon. 49. TfL bus route 370 (Romford to Lakeside, via Upminster) stops near the site's western boundary, and Upminster (District Line, Liberty Line, c2c rail) is the nearest station to the site, and can be reached from the site's western access in around 20 minutes by bus. Multi-modal access and MTS targets 50. The site is not a sustainable location for major development, and all the plots are outside reasonable walking distance to public transport services (between 600m and 2,500m approximately). Some effort has been made to provide for alternatives to private cars to access the site sustainably, including by improving local walking and cycling routes, and providing a complimentary shuttle bus for the data centre staff (only). However, despite this, the resulting car mode share is extremely high (see further below), which raises concern from a strategic transport perspective. Overall, the scheme will largely be car dependent, which makes it not compliant with policy T1 of the London Plan, and the Mayor's Transport Strategy. 51. An extensive Active Travel Zone (ATZ) assessment has been carried out, considering opportunities and constraints to walking and cycling, during both daytime and night-time, also informed by historic collision data. The assessment was thorough, and has identified some improvements along the boundary, and off-site. Improvements including a footway extension and provision of informal crossing facility on Ockendon Road, and a new footway on Fen Lane to integrate the improvements forming part of the Lower Thames Crossing, are proposed to be secured within the S106 agreement. From a strategic transport perspective, the improvements are welcomed in principle, but given the site's location they will, in isolation, unlikely offer genuine choices for travel and noticeably affect mode share. Internal routes and parking 52. In the Design Code, reference should be made to 'clear' minimum widths, to account for street furniture, signage and edge conditions. The primary strategic shared-use foot/cycleways should be 4.5m wide minimum. Any bridges offering shared cycle and pedestrian paths should be a minimum of 4m wide. Minimum lighting requirements must be established, to enable 24/7 use and address concerns about safety of women and girls and gender diverse people. 53. A high level of car parking is proposed (288 spaces across all uses, plus 25 for overflow, aside any operational requirements), which is a natural consequence of the lack of real alternatives. The draft planning conditions/legal obligations should be updated to ensure provision for disabled users and for electric vehicles, and a Parking Design and Management Plan must be secured. The Travel Plan should target a reduction in car parking, including a parking charging system for both staff and visitors to the data centres, horticulture buildings and the ecology park/visitor centre, and/or incentives for those choosing to arrive at the site by public transport or active travel. 54. Cycle parking will be provided for the different elements of the scheme; notwithstanding potential acceptability of quantum and quality of the provision, this will be ineffective if the site is not conveniently and safely accessible by bike. The proposed £1.2m active travel contribution towards off-site travel improvements including pedestrian and cycle paths is noted. A review of the necessary improvements against the requirements of LTN 1/20 and London Cycle Design Standards (LCDS) is recommended prior to the commitment of these funds towards improvement schemes.

		Transport Network Impacts 55. It should be noted that given the nature of the LDO process in this case, a detailed review of the TA, including all designs, assumptions, calculations, and assessments has been left to the borough, including an assessment of the necessary mitigation. 56. The first principles multi-modal trip generation identified a daily total of 654 person trips, each way. Excluding operational trips, car mode share is of 87.6%, which as noted is well beyond the MTS mode share targets. The Travel Plan will need to play a fundamental role in ensuring that active and sustainable travel opportunities are encouraged as much as possible. Vehicular trip generation is estimated as 517 daily movements each way. Impacts will mainly be on local roads, where Havering is the highway authority. The Council must be satisfied that the development would not adversely affect bus journey times and reliability, for example around the chicane on Ockendon Road. 57. As a result of the very small mode share (8.7% total of buses and rail), impact on the capacity of local public transport services will be small. To improve step-free access, a contribution towards the creation of a lift at Upminster station is sought, with trigger for payment to be agreed with TfL. Improvements to local bus stops must be secured too. 58. Construction will take place over approximately 17 years, and it will be essential that impacts on local roads, including on local active travel routes, and bus services, are fully considered, monitored and mitigated. The draft heads of terms confirm that a Construction Logistics Plan and a Construction Phase Travel Plan, plus monitoring, will be secured within the S106 agreement. Environmental sustainability Energy These comments are in addition to comments on energy consumption raised above. 59. An Energy Statement has been prepared and submitted as part of the LDO, which is welcomed and supported. This broadly aligns with the requirements of London Plan Policy SI2, SI3 and SI4 and the Energy Assessment Guidance LPG, which sets out supporting information requirements. It would be expected that a supporting carbon reporting spreadsheet would be submitted in order to verify the reported carbon emissions and carbon offset payment. This should be secured via additional condition. Be lean 60. The applicant has demonstrated through accurate submitted energy modelling that the 15% non-domestic be lean target saving is achievable. Considering the low heat demand environment of the data centres, the proposed u-values are deemed to have been maximised with minimal area for improvement. 61. One area for improvement is the lighting efficacy, which in the BRUKLS and text appears to be between 40-90 lm/W (this is based on the information provided in the energy statement). This is in many cases below the notional standard and considering that this is expected to potentially form 3% of the site's energy demand (according to the Veolia East Havering Data Centre Heat Network Feasibility Study), an improved efficiency could lead to a high energy/carbon saving due to the site's significant demand. 62. To ensure fuller compliance with London Plan Energy policy therefore, an additional condition would be expected to be secured surrounding an improvement of lighting efficacy to demonstrate further savings beyond the 15% non-domestic be lean target. Be clean 63. The applicant has undertaken a full study into the feasibility of developing a heat network to utilise waste heat on site and off site, undertaken by Veolia. This is welcomed in compliance with London Plan Policy SI3. The applicant has committed to using an adiabatic air-cooled chiller system that enables heat recovery on site for use in the Horticulture building. A 3,300m2 energy centre will enable this to take place, utilising a Water-Source Heat Pump (WSHP) to uplift the recovered heat temperature for heating the greenhouse. 64. Capped connections are also provided to enable the offtake of heat to a heat network operator. A potential of an estimated up to 200MW (around 50% of the site's peak demand) could be available for heat offtake. As addressed above, the applicant must continue to explore the potential to catalyse a district heat network, engage with network operators, and seek to size the energy centre accordingly, as the site offers a viable solution to providing very low carbon heat across the entire borough over the timelines of its development. This will help to counteract the extremely high energy usage on site by providing a decarbonisation solution to the borough.

		65. The applicant is not currently proposing to provide waste heat to all other uses on site (instead, a Variable Refrigerant Flow (VRF) is propose). It is stated that this is due to lower efficiency, however the numbers used to verify these claims are not robustly supported by efficiency calculations. Further investigation into this and the benefits of providing waste-heat to all other use classes over VRF on site should be explored. Condition 14 on the draft LDO is noted and welcomed in this regard. Be green 66. The applicant is achieving the 35% on site target for site-wide carbon dioxide emissions for non-residential buildings. Reasonable and conservative SCOP/SEERS for the data centre buildings are being proposed. 67. The applicant is also proposing a PV array of c. 1500 kWp for the development site of c. 350,000m2. The use of PV is supported and aligns well with London Plan Policy SI2, however based on the information presented the PV area does not appear to have been maximised and forms a low proportion of the overall roof area. An additional condition would be expected to further explore the use of PV on site, with the provision of full roof layouts detailing the uses on site to demonstrate how renewable energy technologies have been maximised at the proposed development. PV should also be explored in the form of ground mounted panels, given the site area and expected energy demand. 68. Considering the high electrical capacity required to operate a site of this magnitude and the requirement for back up power generation, the use of battery storage and demand side response must be fully maximised, to provide greater flexibility/minimisation of peak demand. Additional conditions/obligations should be considered to address this. 69. A commitment has been provided that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages, which is secured by condition within the draft LDO. Whole Life Carbon 70. A Whole Life Carbon (WLC) Statement has been prepared and submitted as part of the LDO, and broadly aligns with the requirements for outline planning applications with respect to the adopted London Plan Guidance. 71. The A1-A5 emissions for the scheme are currently higher than any of the standard WLC GLA benchmarks. It is, however, important to note that data centres currently do not have a recognised GLA benchmark. The high emissions can be attributed to the frame heavy nature of the building. Therefore, efforts are expected to be made to consider optimising the design and materials as much as possible within given design constraints. Condition 20 on the draft LDO requires a detailed WLC statement to be submitted prior to the construction of each data centre building, and these comments should be considered when discharging any submission of details in relation to this condition. 72. A condition is included in the draft LDO requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, which is welcomed in accordance with London Plan policy and guidance. Circular Economy 73. A Circular Economy Statement has been prepared and submitted as part of the LDO, which is welcomed. This broadly aligns with the London Plan's requirements. 74. The submission demonstrates a strategic consideration of the circular economy approaches to the new development, and has begun to consider design measures in response to the circular economy principles. However, this lacks consideration of specific features of design to secure these. 75. The Circular Economy Statement submission provides commitments to targets for management of construction and excavation waste, recycling rates for municipal waste, and specification of reused / recycled content. However, there are some areas of misalignment with the definition of targets compared to GLA policy and guidance. The Circular Economy Statement submission references a diversion from landfill target for construction waste, however the London Plan Policy SI 7 target is for 95 reuse / recycling / recovery. Based on the London Plan Guidance (LPG), it should be noted that the reused and recycled content target is set by value, with an example calculation methodology provided in LPG Appendix 3. The London Environment Strategy sets a business waste recycling target of 75% by 2030, which would also be expected to apply to the development proposal. 76. There is no quantitative reporting provided in the Circular Economy Statement submission as would be expected in response to the LPG, and it has therefore not been demonstrated how the proposal's design and construction will reduce material demand, nor how much waste the proposal is expected to generate or how this will be managed. There has also been no detailed consideration of operational waste management demonstrated at this stage.

		77. Conditions 23 and 24 of the draft LDO, which require the submission of a detailed CE statement prior to construction of each building, and the submission of the post-construction reporting, are noted and welcomed. The comments above should be taken into account when discharging these conditions. Flood Risk and Drainage 78. A Flood Risk Assessment (FRA) has been prepared and submitted as part of the LDO, which is welcomed. This FRA generally aligns with the London Plan Policy SI12. Suitable conditions are proposed in the draft LDO in relation to flood risk 79. The submitted drainage strategy also generally aligns with the London Plan Policy SI13 in terms of flood risk and sustainable drainage. It is noted the development proposal is a sitewide strategy and details of each build zone will need to be submitted to demonstrate compliance with the sitewide strategy whilst considering the phasing of the development, to be secured by condition. Water efficiency 80. Water efficiency proposals are included within the Energy and Sustainability Statement submitted as part of the LDO, which is welcomed. Use of rainwater harvesting and water efficient fittings to reduce potable water demand and achieve the equivalent of BREEAM exemplar standard is welcomed. As set out above, detailed discussions with the water provider should be undertaken to ensure there is capacity to supply the proposed development with potable water. Whilst the proposed development incorporates rainwater harvesting to reduce the potable water demand, active monitoring and reporting of potable water consumption, alongside robust operational controls and enforceable measures should be implemented to ensure that rainwater harvesting is used before potable water for cooling demand, and that the annual potable water cap is not exceeded under any operating scenario. The data centre should also demonstrate ongoing water efficiency performance, and, where feasible, safeguard infrastructure to enable future use of non potable or alternative water sources. Green Infrastructure 81. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening which is supported. Various habitat types are incorporated, including broadleaf woodland, wet woodland, meadow and ponds, which supports multifunctionality, in accordance with Policy G1 of the London Plan. Where solar panels have been proposed, the opportunity for biosolar roofing should be explored. 82. The proposed development provides links to the wider green infrastructure network through the provision of wildlife corridors such as swales, hedges and ditches as well as areas of improved habitat that connect into the surrounding areas. This is supported. 83. Being predominantly an industrial development, the application is not required to meet a target Urban Greening Factor. However, the applicant has calculated the Urban Greening Factor (UGF) score of the proposed development as 0.612, which is positive. 84. As noted above, the proposed development is considered to make an enhancement to the biodiversity value of the designation through the extensive habitat creation within the scheme. Biodiversity and nature conservation 85. The site encompasses the Fairplay Farm Site of Importance for Nature Conservation (SINC), and adjoins the Upminster Sewage Works grass beds SINC, both identified as being of Borough importance. The Environmental Statement Ecology chapter sets out that there are direct effects on the Fairplay Farm SINC and indirect effects on the Upminster Sewage Works grass beds SINC anticipated. The applicant sets out how these potential impacts, including dust, noise, vibration and lighting would be managed. Mitigation measures are secured as part of the conditions attached to the LDO, which is welcomed. 86. The applicant has provided quantitative evidence that the proposed development secures a net biodiversity gain of 296.35 Habitat Units (62.45%), 63.12 Hedgerow Units (85.64%) and 18.11 Watercourse Units (236.55%) in accordance with Policy G6 of the London Plan. The applicant has also confirmed that trading rules have been satisfied. 87. The Arboricultural Implication Assessment report states that 25 Category B trees and 32 Category C trees and groups are to be removed. Wherever possible, trees of value should be retained. However, it is noted that a total of 56,687 new trees proposed throughout the scheme which is a significant increase, and the applicant appears to demonstrate a consideration of a diverse range of proposed tree species, which is positive in terms of biosecurity. Air Quality 88. The site is located in the Havering-wide Air Quality Management Area although it is not in an area of poor air quality.

89. A key air quality concern relates to emissions from the 288 backup generators during operation, which have the potential to exceed the 1-hour mean NO_2 air quality limit. Condition 49 of the draft LDO requires all generators to be fitted with Selective Catalytic Reduction (SCR) which is welcomed. In addition, the cleanest available generator technology should be used wherever feasible, and the use of the cleanest practicable emission control technologies should be implemented to minimise pollutants. It is also recommended that the modelled 29 hours of generator testing per year is secured as a maximum limit through planning conditions, and that testing hours are minimised as far as reasonably practicable.

90. The draft heads of terms require Air Quality Neutral Assessments to be produced for each Build Zone, to be developed in line with the GLA's Air Quality Neutral LPG, including an assessment of generators, unless they are installed for emergency and life safety power supply. This is welcomed, although it is noted that an Air Quality Positive statement has not been provided or secured, and the obligation should be updated accordingly, in compliance with London Plan Policy SI1.

Summary and conclusion

91. The proposal for a hyperscale data centre campus would cause substantial harm to Green Belt and constitutes inappropriate development that must be outweighed by Very Special Circumstances (VSC). The GLA acknowledges the need for additional data centre capacity, the benefits to London's economy, and the biodiversity enhancements brought about by the proposal. It is agreed that the site is uniquely positioned to provide a hyperscale data centre of this size, due to its access to power, fibre connectivity, and proximity to existing Availability Zones. Combined, these factors could amount to VSC, although the GLA also highlights that the opportunity for the scheme's significant waste heat output should be appropriately secured and harnessed, to further strengthen the VSC case.

92. Notwithstanding the strategic benefits, the critical impacts of a data centre of this scale that must be addressed and mitigated before the Council decides to make an LDO. The scheme's substantial electricity demand and high water consumption present potential challenges for Havering's future growth capacity. These impacts require further mitigations and safeguards. Further commitments in the design and the S106 obligations are suggested to ensure that the significant waste heat export opportunity is fully realised.

93. The site's public transport accessibility is low, and car dependency is expected to remain extremely high for a development of this scale. The proposed active travel improvements and shuttle bus measures are noted, but strengthened mitigations should be considered to reduce car dependency, increase the incentives for active travel, and fully contribute to public transport improvements.

94. The proposed environmental sustainability measures are broadly welcomed, though further conditions and obligations are requested to ensure fuller compliance with London Plan policies.

95. In the light of these comments, the GLA recommends the following additional conditions, obligations, evidence and design refinements should be secured before the LDO is made:

Electricity supply

- Contribution towards preparation of a Phase 2 Local Area Energy Plan.
- Annual reporting on energy usage, including utilisation against grid connection agreements.
- Minimum Power Usage Effectiveness (PUE) standards for each building.
- Requirement to submit to Havering Council any future electricity and water connection requests.
- Commitment to maximising renewable energy supply, including standards that meet or exceed the Climate Neutral Data Centre Pact.
- Protections in the LDO to safeguard against risks from future Ofgem/DESNZ connection queue reforms.

Heat Recovery & Waste Heat

- Binding requirements in the LDO for heat-export.
- Additional S106 infrastructure contributions towards the development of a future heat network.
- Flexibility to expand the Energy Centre footprint beyond 3,300 sqm.
- Requirement for demonstrable engagement with licensed heat network operators, private ESCos, and potential heat offtakers.

Water Supply & Efficiency

- Measures ensuring rainwater harvesting is prioritised before potable water for cooling.
- Active monitoring and reporting of potable water usage to ensure cap compliance.
- Applicant must demonstrate secured potable water supply connections from Essex & Suffolk Water.

		• Requirement that any Environment Agency abstraction licence be subject to Council notification and approval. • Safeguards to enable future use of non-potable or alternative water sources. Energy efficiency and carbon reporting • Condition requiring improved lighting efficacy, exceeding the current 40–90 lm/W range, to deliver further "Be Lean" energy savings. • Condition requiring maximisation of PV coverage, including: o Full roof layout plans demonstrating renewable energy optimisation. o Exploration of ground-mounted solar PV across the site. • Additional obligations to maximise battery storage and demand-side flexibility to minimise peak electrical loads. • Submission of a supporting carbon reporting spreadsheet to verify emissions calculations and offset payments. Circular Economy • Circular Economy Statements should include the following details: o Align waste targets with London Plan Policy SI7 (95% reuse/recycling/recovery). o Include quantitative reporting of material demand and waste flows. o Address operational waste management in more detail. Air Quality • Additional condition to limit generator testing to a maximum of 29 hours per year. • Requirement to use the cleanest generator technology available. • Update Heads of Terms to require Air Quality Positive assessments, not only Air Quality Neutral. Design & Landscape • Condition requiring submission of indicative rendered views (short- and mid-range) to demonstrate building appearance and materiality. • Requirement to secure a strategy for future adaptation, dismantling, and restoration of buildings/land. Transport • Ensure minimum widths for internal pedestrian/cycle routes (4.5m; 4m for bridges) and secure in the Design Code. • Secure minimum lighting standards for safety, particularly women and girls. • Update obligations to ensure: o Adequate disabled parking and EV charging. o A Parking Design & Management Plan. o Travel Plan measures to reduce car parking demand, including car park pricing measures. • Public transport contribution to be agreed with TfL
347	Individual	FORMAL PLANNING OBJECTION to LDO0001.26 East Havering Data Centre Local Development Order (LDO) Contents 1. Executive Summary ..... 1 2. Procedural and Legal Deficiencies ..... 2 3. Fundamental Misuse of the LDO Mechanism ..... 2 4. Green Belt Harm and Failure of Very Special Circumstances ..... 3 5. Critical Safety Issue: High-Pressure Gas Transmission Pipeline ..... 4 6. Fire And Emergency Response Risk (Including London Fire Brigade) ..... 7 7. Environmental And Infrastructure Risks (Expanded) ..... 11 8. Human Impact: Noise, Air Quality, Traffic And Health ..... 12 9. Evidence Reliability And Systemic Risk ..... 13 10. Overall Conclusion ..... 13 TECHNICAL APPENDIX: GAS PIPELINE AND FIRE RISK ASSESSMENT 14

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1. Executive Summary
This objection is submitted on the basis that the proposed Local Development Order (LDO):

- Seeks to grant efectively outline consent for one of the largest data centre campuses in Europe (~400,000 m^2; ~600 MW; ~17–20 year build programme) using a mechanism intended for low-risk, pre-assessed development
- Fails to demonstrate “very special circumstances” (VSC) sufficient to outweigh substantial, permanent Green Belt harm
- Relies on assumptions, modelled scenarios, and non-binding projections rather than secured, enforceable, or independently verified evidence
- Introduces material and insuUiciently assessed major hazard risk, particularly in relation to a high-pressure gas transmission pipeline crossing the site
- Fails to demonstrate that fire, explosion, and emergency response risks (including those relevant to the London Fire Brigade) are understood, mitigated, or acceptable

The proposal is therefore unsound, premature, and exposes the decision-maker to significant planning, safety, and legal risk.

2. Procedural and Legal Deficiencies
2.1 Consultation and EIA Compliance Risk

- ~3,000 pages of technical documentation
- Consultation period (~31 days) only marginally exceeds statutory minimum

Critical issue:

- The scale, technical complexity, and hazard profile of the scheme require extended

scrutiny, which has not been provided
Legal risk:

- Potential failure to comply with:
  - EIA Regulations 2017 (Regulation 64) – requirement to properly consider environmental information
  - Public law requirements for fair and meaningful consultation

3. Fundamental Misuse of the LDO Mechanism
The proposal is fundamentally incompatible with the purpose of an LDO.
3.1 Scale and Complexity

- ~600 MW power demand (equivalent to a small power station)
- ~286 diesel generators
- 17–20 year phased delivery
- Multiple interdependent infrastructure systems:
  - Grid connection (not fully secured)
  - Water supply
  - Drainage
  - Transport

3.2 Consequence of LDO Approach

- Removes requirement for future full planning applications
- Replaces scrutiny with limited prior approvals
- Prevents realistic and thorough reassessment of:
  - Environmental impacts
  - Infrastructure capacity
  - Safety risks

This creates a “front-loaded uncertainty” problem, where permission is granted before impacts are fully known

4. Green Belt Harm and Failure of Very Special Circumstances
4.1 Nature of Harm

- ~218 hectares of open countryside

		• Will contain inappropriate and unsightly Buildings up to ~35m high, removing openness
		• Industrialisation of rural landscape
		• The permanent loss of approximately 218 hectares of agricultural land, currently in active use.
		
		Harm includes:
		• Loss of openness (core Green Belt purpose)
		• Urban sprawl
		• Erosion of settlement separation
		• Loss of Grade 2 or Grade 3a under the Agricultural Land Classification (ALC) system, classified as “Best and Most Versatile” (BMV) agricultural land
		• Loss of productive agricultural land is a strategic national issue, not just a local one.
		4.2 Failure of VSC Test
		Need
		• Based on global demand projections and applicant evidence
		• No independent verification
		• Probable obsolescence of this data centre at the conclusion of construction Alternatives
		• No robust demonstration that:
		  ○ Brownfield sites are unavailable
		  ○ Distributed development is unviable
		Benefits
		• Low employment density
		• Highly automated
		• Not location-specific
		Conclusion:
		The VSC case is speculative, while harm is certain and permanent
		
		5. Critical Safety Issue: High-Pressure Gas Transmission Pipeline
		5.1 Nature of the Constraint
		• A high-pressure gas transmission pipeline crosses the site
		• The site lies within a Health and Safety Executive (HSE) consultation zone
		Such pipelines:
		• Operate at very high pressures (often 30–85 bar or higher)
		• Are classified as Major Accident Hazard (MAH) infrastructure
		5.2 Consequence-Based Risk Profile
		Pipeline failure, while rare, results in:
		Credible Major Accident Scenarios
		• Full bore rupture → gas cloud ignition
		• Jet fire / fireball
		• Explosion (vapour cloud ignition)
		Impacts
		• Thermal radiation capable of causing:
		  ○ Fatalities
		  ○ Severe burns at distance
		• Blast overpressure damaging structures
		• Secondary fires
		These are low probability, high consequence events, requiring strict land-use control
		5.3 Incompatibility with Proposed Development
		The proposal introduces:
		• ~286 diesel generators
		• Significant on-site fuel storage
		• High-voltage electrical infrastructure

		• Continuous operational occupation
		• Long-term construction activity
		Compounding Risk Mechanisms
		5.3.1. Construction Phase Risk (17–20 years)
		• Deep excavation and piling
		• Heavy plant operation
		• Vibration and ground disturbance
		Risk:
		• Accidental pipeline damage
		• Increased exposure over extended timeframe
		5.3.2. Operational Phase Risk
		• Co-location of:
		  ○ Ignition sources
		  ○ Fuel storage
		  ○ Electrical infrastructure
		Effect:
		• Amplifies consequences of any pipeline failure
		• Increases likelihood of escalation (multi-source fire/explosion)
		5.3.3. Hazard Interaction Risk
		This is critical and often under-assessed:
		• Pipeline rupture → fire/explosion
		• Nearby diesel storage → secondary fire load
		• Electrical infrastructure → ignition and propagation
		This creates a compound hazard environment, not a single risk source
		5.4 Inadequacy of Proposed Mitigation
		The LDO references a ~3m stand-off distance.
		This is not a meaningful safety justification, because:
		• HSE consultation zones extend far beyond this distance
		• Risk acceptability depends on:
		  ○ Population exposure
		  ○ Consequence modelling
		  ○ Land use type
		Missing Critical Evidence
		• No transparent Quantitative Risk Assessment (QRA)
		• No:
		  ○ Thermal radiation contour mapping
		  ○ Explosion overpressure modelling
		• No demonstration of:
		  ○ ALARP compliance
		  ○ Acceptable societal risk
		5.5 Planning and Legal Implication
		• The pipeline represents a primary constraint, not a secondary consideration
		• Risk has not been demonstrated to be:
		  ○ Understood
		  ○ Acceptable
		  ○ Mitigated
		Granting an LDO in this context is:
		• Premature
		• Potentially unsafe
		• Exposes the authority to significant liability

		6. Fire And Emergency Response Risk (Including London Fire Brigade)
		6.1 Nature of Fire Risk on Site
		The development introduces:
		
		• Large-scale electrical infrastructure (high fault energy systems)
		• Extensive cable networks
		• Battery systems (potentially lithium-ion, depending on design evolution)
		• ~286 diesel generators and fuel systems
		• Complex building layouts and phased construction
		Fire Risk Characteristics
		• High energy density
		• Potential for:
		  ○ Electrical fires
		  ○ Fuel fires
		  ○ Multi-seat ignition scenarios
		• Difficult-to-extinguish infrastructure fires
		6.2 London Fire Brigade Operational Considerations
		For a development of this scale, LFB must be able to:
		• Access all areas quickly
		• Maintain adequate water supply
		• Operate safely in high-risk environments
		• Manage large-scale or simultaneous incidents
		Key Concerns
		6.2.1. Site Scale and Access
		• Very large, secured campus
		• Controlled access points and security infrastructure
		Risk:
		• Delayed emergency response
		• Restricted access routes
		• Congestion during construction and operation
		6.2.2. Water Supply for Firefighting
		• Data centres require substantial firefighting water capacity
		Conflict identified:
		• High operational water demand (cooling)
		• Unclear provision of:
		  ○ Dedicated firefighting water infrastructure
		  ○ Redundancy in supply
		6.2.3. Generator and Fuel Fire Risk
		• Large number of diesel generators
		• On-site fuel storage
		Fire scenarios:
		• Fuel tank fire
		• Generator cascade failure
		• Multi-unit fire spread
		Requires:
		• Significant separation distances
		• Robust containment
		• Fire suppression systems
		Evidence gap:

		• No clear demonstration of LFB-approved fire strategy at full build-out scale
		6.2.4. Interaction with Gas Pipeline Risk
		This is a critical combined hazard scenario:
		• Pipeline rupture → ignition
		• Fire spreads to:
		  ○ Generator fuel storage
		  ○ Electrical systems
		Result:
		• Escalating, multi-source fire event
		• Potential for:
		  o Large-scale evacuation
		  o Extended emergency response
		This type of scenario requires integrated risk assessment, which is not clearly evidenced
		6.2.5. Construction Phase Fire Risk
		• 17–20 year rolling construction
		• Temporary works, fuel storage, incomplete infrastructure
		Risk:
		• Fire safety conditions change continuously
		• Difficult for LFB to maintain consistent operational understanding
		6.3 Absence of Demonstrated Compliance
		There is no clear evidence of:
		• A comprehensive Fire Strategy agreed with London Fire Brigade
		• Demonstration that:
		  ○ Access standards are met across all phases
		  ○ Water supply is sufficient and resilient
		  ○ Emergency response times are acceptable
		6.4 Planning Implication
		Fire and emergency response considerations are:
		• Fundamental to site suitability
		• Not a detail to be resolved post-consent
		The LDO attempts to defer these issues, which is inappropriate.
		
		7. Environmental And Infrastructure Risks (Expanded)
		7.1 Generator Use and Air Quality
		• Assumed ≤72 hours/year operation is:
		• Not enforceable
		• Not guaranteed
		Real-world risk:
		• Increased outages → increased generator use
		• Significant NO_2 and particulate emissions
		7.2 Water Demand
		• ~112 million litres/year demand
		Key issue:
		• Rainwater harvesting figures are:
		  ○ Theoretical
		  ○ Seasonally unreliable
		  ○ Claims of unrealistically high rainwater harvesting
		Likely heavy reliance on mains water supply
		7.3 Drainage and Hydrology
		• Site underlain by engineered fenland drainage system

Risk:

- Disruption leads to:
  - Flooding
  - Water table instability
  - Off-site impacts

7.4 Heat Generation

- Potential for localised heat island effects (up to 9 degrees increase)
- No robust cumulative modelling

7.5 Transport

- No enforceable traffic limits
- Heavy reliance on behavioural assumptions
- Significant construction traffic over extended period

8. Human Impact: Noise, Air Quality, TraUic And Health

8.1 Significant, long-term and cumulative impacts on human health and residential amenity, arising from:

- A 17–20 year construction programme
- Continuous 24/7 industrial operation
- Extensive diesel generator infrastructure (~286 units)
- Sustained and increased traUic flows on constrained rural roads

These impacts are:

- Interrelated and mutually reinforcing
- Long-term (not temporary)
- Under-assessed in the Environmental Statement (ES)

8.2 The ES itself acknowledges potential adverse effects human health:

- Mental wellbeing
- Stress from noise and traffic

but fails to adequately mitigate or quantify these impacts

8.3 The proposed development would result in:

- Prolonged construction disruption lasting up to two decades
- Permanent industrial noise in a currently quiet rural area
- Increased air pollution from generators, traffic, and construction
- Sustained increases in traffic on unsuitable rural roads
- Cumulative and long-term impacts on physical and mental health

These impacts are:

- Under-assessed
- Not fully mitigated
- Not subject to enforceable controls

See Technical Appendix On Human Health Impacts

9. Evidence Reliability And Systemic Risk

A consistent pattern exists:

- Assumptions presented as realistic outcomes
- Maximum theoretical values presented as deliverable
- Lack of enforceable constraints

This leads to systematic underestimation of impact and risk

10. Overall Conclusion

This proposal:

- Causes substantial, permanent Green Belt harm

- Fails to demonstrate very special circumstances
- Introduces major unresolved safety risks, including:
  - High-pressure gas pipeline hazard
  - Fire and emergency response risk
- Relies on incomplete and assumption-led evidence
- Misuses the LDO mechanism to bypass proper planning control

FINAL POSITION
The proposed LDO is unsound, unsafe, inadequately evidenced, and should be refused.

TECHNICAL APPENDIX: GAS PIPELINE AND FIRE RISK ASSESSMENT
East Havering Data Centre LDO

1. Purpose of this Appendix
This appendix provides a focused technical assessment of:
- Risks associated with the high-pressure gas transmission pipeline crossing the site
- The interaction between that hazard and the proposed data centre infrastructure
- The adequacy of fire safety and emergency response provisions, including implications for the London Fire Brigade (LFB)

The objective is to assess whether:
The risks have been properly identified, quantified, and demonstrated to be acceptable at the point of granting an LDO.

2. High-Pressure Gas Transmission Pipeline
2.1 Nature of Infrastructure
The site is intersected by a high-pressure gas transmission pipeline, which:
- Operates at very high pressures (typically tens of bar or higher)
- Is part of the national strategic gas network
- Is classified as Major Accident Hazard (MAH) infrastructure

Such pipelines are subject to:
- Health and Safety Executive (HSE) consultation zones
- Strict land-use planning controls under UK risk-based planning policy

2.2 Hazard Characteristics
The principal hazard arises from loss of containment, including:
Credible Failure Scenarios
- Full bore rupture
- Partial rupture or leak
- External interference (e.g. during construction)

Resulting Hazard Types
- Jet fire
- Fireball (ignited gas cloud)
- Vapour cloud explosion (in confined conditions)

2.3 Consequence Profile
Although low probability, failure consequences are severe:
- Thermal radiation capable of causing:
  - Fatalities
  - Severe injury at significant distances
- Blast overpressure:
  - Structural damage
  - Window breakage and debris hazards

- Secondary fires:
  - Ignition of nearby infrastructure

These impacts extend well beyond the immediate vicinity of the pipeline

3. Regulatory and Assessment Requirements
3.1 HSE Land Use Planning Framework
Development near pipelines must be assessed using:

- HSE PADHI (Planning Advice for Developments near Hazardous Installations)
- Consideration of:
  - Individual risk
  - Societal risk
  - Vulnerability of proposed land use

3.2 Requirement for Quantitative Risk Assessment (QRA)
A development of this scale would normally require:

- Detailed Quantitative Risk Assessment, including:
  - Failure frequency analysis
  - Consequence modelling
  - Risk contour mapping
- Demonstration that risk is:
  - ALARP (As Low As Reasonably Practicable)
  - Acceptable in planning terms

3.3 Key Observation
There is no clear, transparent evidence that:

- A full QRA has been undertaken and disclosed
- Risk contours have been mapped against:
  - Buildings
  - Occupancy levels
  - Critical infrastructure

This represents a significant evidential gap

4. Interaction with Proposed Development
4.1 Scale and Nature of Development
The proposal introduces:

- ~286 diesel generators
- Significant fuel storage
- High-voltage electrical infrastructure
- Continuous operational occupation
- 17–20 year construction period

4.2 Hazard Interaction (Critical Issue)
Risk is not limited to the pipeline alone — it arises from interaction between hazards.
Key Interaction Scenarios
1. Pipeline failure → ignition → fire spreads to generator fuel systems
2. Electrical fault → ignition source → escalation of gas release event
3. Simultaneous infrastructure failure during extreme conditions (e.g. heatwave + grid outage)
These are compound risk scenarios, not assessed through single-hazard analysis
4.3 Consequence Amplification
The presence of:

- Fuel storage
- Electrical systems

		• Dense infrastructure
		means that:
		Any primary incident has the potential to escalate into a multi-source, large-scale fire or explosion event
		
		5. Construction Phase Risk
		5.1 Duration and Exposure
		• Construction period: 17–20 years
		• Continuous presence of:
		  ○ Heavy machinery
		  ○ Excavation works
		  ○ Ground disturbance
		5.2 Key Risks
		• Accidental pipeline strike
		• Vibration-induced damage
		• Inadequate control of exclusion zones
		5.3 Risk Amplification
		The extended duration of construction significantly increases:
		• Probability of human error
		• Exposure to unforeseen ground conditions
		• Cumulative risk over time
		This is materially different from typical short-duration construction projects
		
		6. Adequacy of Proposed Mitigation
		6.1 Pipeline Stand-Off Distance
		The proposal references a ~3m buffer zone.
		This is not sufficient evidence of safety, because:
		• HSE consultation zones are typically much wider
		• Risk acceptability depends on:
		  ○ Consequence distances
		  ○ Occupancy levels
		  ○ Use type
		
		6.2 Missing Mitigation Evidence
		There is no clear demonstration of:
		• Defined exclusion zones aligned with risk contours
		• Restrictions on:
		  ○ Building placement
		  ○ Fuel storage
		  ○ High-risk equipment
		• Construction-phase protection measures
		• Emergency shutdown systems integrated with pipeline risk
		
		7. Fire Risk and Emergency Response
		There is no clear evidence of:
		• A comprehensive, site-wide Fire Strategy
		• Agreement with London Fire Brigade
		• Demonstration of compliance with:
		  ○ Access standards
		  ○ Water supply requirements
		  ○ Emergency planning

		7.1 Nature of Fire Risk The development introduces multiple fire load sources: ○ Diesel fuel (generators) ○ Electrical infrastructure ○ Potential battery systems ○ Extensive cabling 7.2 Fire Behaviour Characteristics • High energy release • Potential for rapid escalation • Difficult access to internal fire sources • Long-duration burn scenarios 7.3 London Fire Brigade (LFB) Considerations 7.3.1 Access and Site Layout • Large, secure campus • Controlled entry points Risks: • Delayed appliance access • Restricted movement within site • Potential congestion during incidents 7.3.2 Water Supply Requirements Firefighting at this scale requires: • High-volume, reliable water supply • Redundant systems Issue: • No clear demonstration of: ○ Dedicated firefighting water infrastructure ○ Resilience under peak demand or failure scenarios 7.3.3 Multi-Seat Fire Scenarios • Simultaneous fires across: ○ Generators ○ Electrical systems ○ External plant Requirement: • Significant separation distances • Compartmentalisation • Advanced suppression systems Evidence gap: • No demonstrated LFB-approved fire strategy at full build-out scale 7.3.4 Combined Gas and Fire Scenario This is the most critical risk scenario: Scenario • Pipeline rupture → ignition → large fire • Fire spreads to: ○ Diesel storage ○ Generators ○ Electrical systems Consequences ○ Rapid escalation ○ Multiple ignition sources ○ Extended burn duration

		○ Large-scale emergency response requirement This scenario requires integrated modelling, which is not clearly evidenced 7.3.5 Construction Phase Fire Risk • Changing site conditions • Temporary infrastructure • Incomplete fire systems Implication: • Difficult for LFB to maintain operational readiness • Increased likelihood of uncontrolled fire spread 8. Planning and Safety Implications 8.1 Prematurity of Consent The LDO seeks to grant permission before: • Major hazard risks are fully assessed • Fire strategy is defined and agreed • Emergency response feasibility is demonstrated 8.2 Incompatibility with LDO Approach These risks require: • Iterative assessment • Detailed design scrutiny • Stage-by-stage approval These are not compatible with blanket permission via LDO 8.3 Risk to Decision-Maker Approving the LDO without resolving these issues: • Transfers risk to: ○ Public ○ Emergency services ○ Local authority • Creates exposure to: ○ Legal challenge ○ Liability in the event of incident 9. Technical Conclusion The available evidence does not demonstrate that: • Risks associated with the high-pressure gas pipeline are: ○ Fully understood ○ Quantified ○ Acceptable • Fire and emergency response risks have been: ○ Properly assessed ○ Designed for ○ Agreed with London Fire Brigade FINAL TECHNICAL POSITION The proposal fails to demonstrate that major hazard and fire risks are acceptable, and therefore should not be granted consent via LDO. TECHNICAL NOTE: LOSS OF ARABLE FARMLAND AND IMPACT ON FOOD PRODUCTION 1. Overview The proposed East Havering Data Centre would result in the permanent loss of approximately 218 hectares of agricultural land, currently in active use. This represents a substantial conversion of productive farmland into non-agricultural, industrial use, with

long-term implications for:

- Local and regional food production
- Soil resource sustainability
- National food security objectives
- Climate resilience

2. Agricultural Land Quality and Classification

2.1 Likely Land Type: Best and Most Versatile (BMV)

The site lies within lowland Essex/London fringe agricultural land, which is typically:

- Grade 2 or Grade 3a under the Agricultural Land Classification (ALC) system
- Classified as “Best and Most Versatile” (BMV) agricultural land

BMV land is defined as:

Land most flexible, productive, and efficient in response to inputs, capable of producing a wide range of crops.

2.2 Planning Policy Context

Under the National Planning Policy Framework (NPPF):

- Significant development should avoid the loss of BMV land where possible
- Where loss is unavoidable, it should be:
  - Clearly justified
  - Minimized

Key issue:

- There is no robust demonstration that:
  - Lower-quality land has been prioritised
  - Agricultural land loss has been minimised

3. Current Agricultural Function of the Site

3.1 Productive Arable Use

The land is currently used for:

- Cereal crops (e.g. wheat, barley)
- Oilseed rape
- Other rotational arable crops

These systems depend on:

- Established soil structure
- Managed drainage (critical in fenland areas)
- Long-term soil conditioning

3.2 Role in Local Farming Systems

The site is not isolated — it forms part of:

- Larger farm holdings
- Integrated crop rotation systems
- Local agricultural supply chains

Loss of this land would:

- Disrupt farm viability
- Reduce operational efficiency
- Fragment agricultural units

4. Scale of Agricultural Loss

4.1 Land Area Impact

- ~218 hectares = 2.18 km^2 of farmland

This is:

- Equivalent to hundreds of football pitches
- A significant contiguous block, not marginal land

4.2 Irreversibility

The development includes:

		• Buildings
		• Hardstanding
		• Substations
		• Roads and security infrastructure
		This results in:
		Permanent sterilisation of soil resources
		Unlike temporary land use, this land:
		• Cannot realistically be restored to agriculture
		• Will lose:
		  ○ Soil structure
		  ○ Organic content
		  ○ Drainage functionality
		
		5. Soil Resource Damage
		5.1 Soil as a Finite Resource
		High-quality agricultural soil:
		• Takes hundreds to thousands of years to form
		• Is effectively non-renewable within planning timescales
		5.2 Construction Impacts
		Construction of this scale will:
		• Strip topsoil
		• Compact subsoil
		• Disrupt soil horizons
		• Alter natural drainage
		Even with mitigation (e.g. soil storage):
		• Soil quality typically degrades significantly
		• Reinstatement rarely restores original productivity
		5.3 Drainage System Disruption
		The site sits on a managed fenland drainage system, including:
		• Subsurface pipe networks
		• Controlled water movement
		Impact of development:
		• Breaks or reroutes drainage systems
		• Alters water table levels
		This can lead to:
		• Waterlogging
		• Soil degradation
		• Loss of agricultural viability beyond the site
		
		6. Impact on Food Production
		6.1 Direct Loss of Crop Output
		218 hectares of arable land would typically produce:
		• Significant annual yields of:
		  ○ Cereals
		  ○ Oil crops
		Loss equates to:
		• Permanent removal of food-producing capacity
		6.2 Cumulative and Strategic Impact
		Individually, one site may appear limited — but:
		• The UK is already experiencing progressive loss of farmland to development

		• High-quality land near urban areas is disproportionately affected
		This contributes to:
		• Reduced domestic food production
		• Increased reliance on imports
		• Greater exposure to global supply shocks
		6.3 Food Security Context
		UK food security is influenced by:
		• Climate change
		• Geopolitical instability
		• Supply chain disruptions
		In this context:
		Loss of productive agricultural land is a strategic national issue, not just a local one.
		
		7. Climate Change and Sustainability Implications
		7.1 Carbon Storage
		Agricultural soils:
		• Store significant amounts of carbon Disturbance releases:
		• CO_2 into the atmosphere
		7.2 Increased Carbon Footprint
		Loss of local food production leads to:
		• Increased imports
		• Longer transport distances
		• Higher embedded emissions
		7.3 Loss of Climate Resilience
		BMV land provides:
		• Reliable yields under variable conditions
		• Flexibility in crop choice
		Loss reduces:
		• Agricultural adaptability
		• Regional resilience to climate impacts
		
		8. Lack of Mitigation or Compensation
		8.1 No Meaningful Replacement
		There is:
		• No proposal to replace lost agricultural land
		• No equivalent land brought into production
		8.2 Soil Reuse Limitations
		Even where soils are reused:
		• They are typically:
		  ○ Lower quality
		  ○ Disconnected from original system
		
		8.3 Misalignment with “Sustainability” Claims
		The development promotes:
		• Sustainability
		• Environmental responsibility
		However:
		• Permanent loss of high-quality farmland is inherently unsustainable
		
		9. Planning Balance Implications

		Key Point The loss of agricultural land is: • Certain • Immediate (post-construction) • Permanent Whereas claimed benefits are: • Uncertain • Long-term • Potentially overstated 10. Technical Conclusion The proposed development would: • Result in the permanent loss of a substantial area of productive arable farmland • Likely involve the loss of Best and Most Versatile agricultural land • Cause irreversible damage to soil resources and drainage systems • Reduce local and national food production capacity • Conflict with planning policy requiring protection of high-quality agricultural land FINAL POSITION The scale, permanence, and strategic importance of agricultural land loss represent a significant adverse impact that has not been adequately justified, mitigated, or addressed within the LDO. ADDITIONAL NOTES: HUMAN IMPACT FROM NOISE, AIR QUALITY, TRAFFIC AND HEALTH 1. Overview The proposed development gives rise to significant, long-term and cumulative impacts on • human health and residential amenity, arising from: • A 17–20 year construction programme • Continuous 24/7 industrial operation • Extensive diesel generator infrastructure (~286 units) • Sustained and increased traffic flows on constrained rural roads These impacts are: • Interrelated and mutually reinforcing • Long-term (not temporary) • Under-assessed in the Environmental Statement (ES) The ES itself acknowledges potential adverse effects on: • Mental wellbeing • Stress from noise and traffic but fails to adequately mitigate or quantify these impacts 2. Construction Phase Impacts (17–20 Years) 2.1 Duration: Not Temporary, but Generational The construction programme is stated to last up to 17–20 years. This means: • Impacts are not temporary disruption • They represent a long-term alteration of living conditions As identified in your document: • “Construction impact should be treated as long-term environmental change, not temporary inconvenience.” 2.2 Noise and Vibration Construction activities will include:

		• Earthworks (~642,000 m^3) • Piling and excavation • Continuous HGV movements • Heavy plant operation Likely effects: • Persistent daytime noise • Intermittent high-impact noise events • Ground vibration effecting nearby properties The ES identifies moderate to major adverse noise impacts, yet: • Simultaneous and cumulative effects are not fully assessed 2.3 Air Quality and Dust Construction will generate: • Dust (PM10 and PM2.5) • Diesel emissions from machinery and HGVs However: • There is no robust cumulative modelling of construction emissions • Impacts on nearby residents and farms are under-assessed 2.4 Traffic Impacts During Construction Construction traffic includes: • Thousands of HGV movements • Abnormal loads • Workforce travel Local roads (e.g. Fen Lane, B186) are: • Narrow • Rural • Not designed for sustained industrial traffic Likely real-world impacts: • Congestion and delays • Increased accident risk • Rat-running through residential areas As your document highlights: “Short–medium term: major disruption (construction traffic)” 3. Operational Phase Impacts (Permanent) 3.1 Continuous Industrial Noise The data centre will operate 24/7, generating noise from: • Cooling systems • Fans and chillers • Substations and electrical equipment This results in: • Continuous low-frequency “hum” • Increased background noise levels As identified: “Constant low-frequency noise (‘hum’)… potential sleep disturbance… mental health issues” 3.2 Generator Noise and Events With ~286 generators: • Routine testing and maintenance • Potential emergency operation Key issue: • The ES assumes ≤72 hours/year usage, which is: ○ Not evidence-based

		○ Not enforceable If exceeded: • Noise impacts increase significantly • Multiple generators may operate simultaneously 3.3 Operational Traffic The proposal suggests ~1,000+ daily trips. However: • This relies on optimistic behavioural assumptions • Real-world conditions indicate: ○ Car dependency ○ Ongoing service, maintenance, and logistics traffic ○ As identified: Traffic is likely to be “moderate but constant,” not minimal 4. Air Quality Impacts 4.1 Generator Emissions The development includes ~286 diesel generators. Risks: • Emission of: ○ Nitrogen oxides (NOx) ○ Particulate matter (PM2.5 / PM10) The ES: Page 36 of 40 • Relies on a 72-hour assumption • Provides no worst-case or sensitivity analysis This is a critical flaw. Even modest increases in usage could: • Significantly raise emissions • Lead to localised pollution spikes 4.2 Conflict with Policy This raises conflict with: • National Planning Policy Framework (NPPF) • London Plan air quality policies • Local Plan requirements to protect residential amenity As stated: The development risks contributing to unacceptable levels of air pollution and failing to safeguard health 4.3 Construction and Traffic Emissions Additional sources: • Construction plant • HGV traffic • Increased operational vehicle use These are: • Not fully modelled cumulatively • Likely to worsen local air quality 5. Cumulative Impact: A Constant Environmental Burden The key planning issue is cumulative impact, not individual effects. Residents will be exposed to: • Long-term construction noise + dust

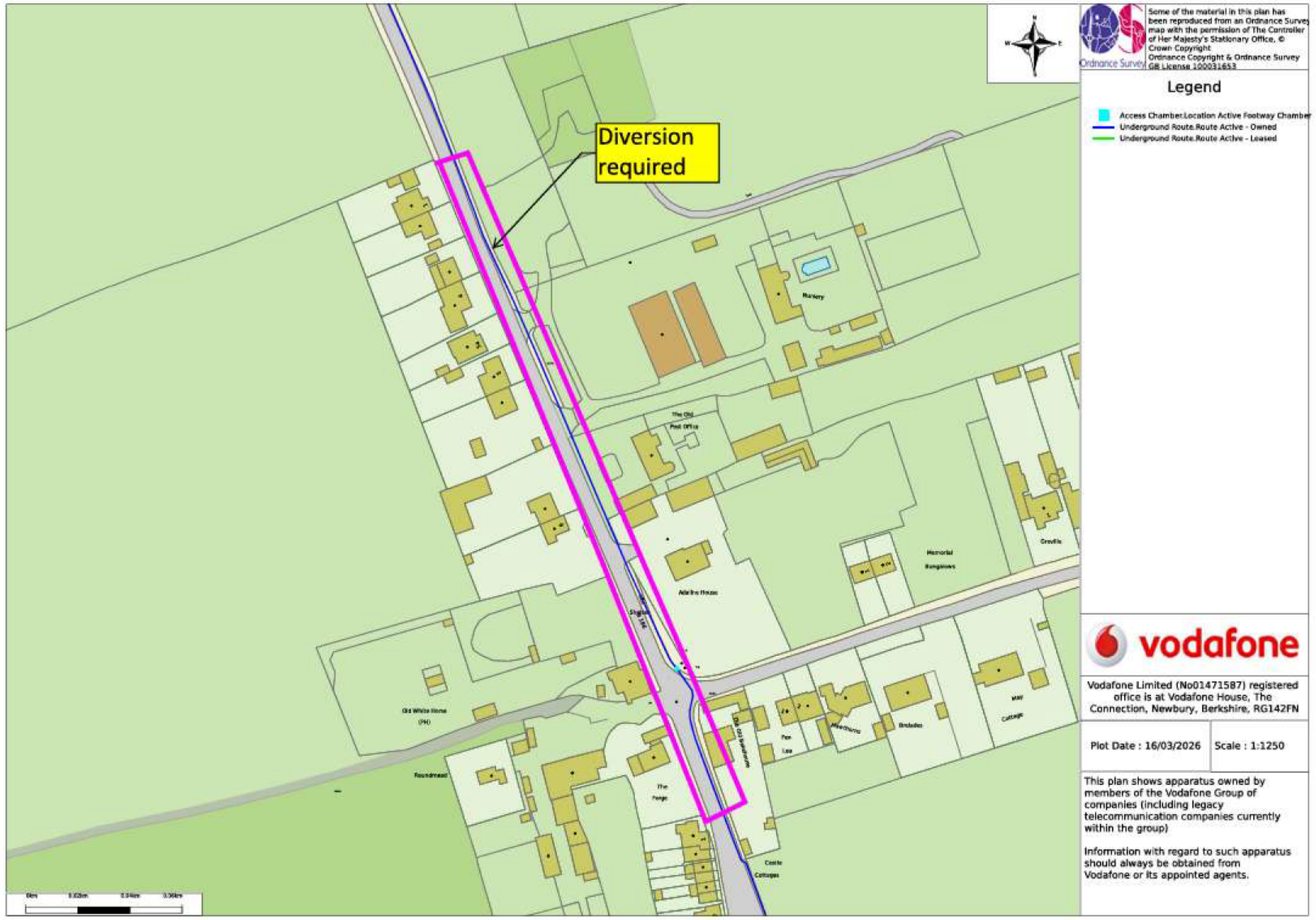
		• Continuous operational noise
		• Intermittent generator noise and emissions
		• Permanent increase in traffic
		This creates:
		A layered, continuous environmental burden over decades
		As your document states:
		“Impacts are long-term and cumulative… not capable of being fully mitigated”
		
		6. Health and Wellbeing Impacts
		6.1 Evidence from the Application
		The Health Impact Assessment identifies:
		• Stress due to noise and traffic
		• Impacts on mental wellbeing
		However:
		• These impacts are acknowledged but not mitigated
		6.2 Physical Health Impacts
		Exposure to:
		• NOx and particulate matter
		• Long-term environmental noise
		is associated with:
		• Respiratory illness
		• Cardiovascular disease
		As noted:
		Increased generator use is linked to respiratory and cardiovascular impacts
		6.3 Mental Health and Quality of Life
		Long-term exposure to:
		• Noise
		• Traffic
		• Environmental change leads to:
		• Stress and anxiety
		• Reduced wellbeing
		• Loss of enjoyment of home environment
		6.4 Sleep Disturbance
		Continuous and low-frequency noise can:
		• Disrupt sleep patterns
		• Reduce sleep quality
		This is particularly significant given:
		• 24/7 operation
		• Night-time sensitivity
		6.5 Disproportionate Impact on Local Residents
		Impacts are likely to fall most heavily on:
		• Nearby rural communities (e.g. North Ockendon)
		As identified:
		Impacts are concentrated and disproportionately affect local residents
		7. Assessment Limitations and Uncertainty
		Across noise, air quality, and traffic:
		• Assessments rely heavily on:
		  ○ Assumptions
		  ○ Optimistic modelling
		• Lack:

		○ Worst-case scenarios ○ Enforceable limits ○ Robust cumulative analysis This leads to systematic underestimation of real-world impact 8. Planning Implications 8.1 Significance of Harm The impacts identified are: • Long-term • Continuous • Affecting residential receptors They therefore constitute: Significant adverse impacts on residential amenity and health 8.2 Incompatibility with LDO Approach These impacts require: • Ongoing monitoring • Adaptive mitigation • Detailed design control None of which are compatible with blanket consent via LDO 9. Conclusion The proposed development would result in: • Prolonged construction disruption lasting up to two decades • Permanent industrial noise in a currently quiet rural area • Increased air pollution from generators, traffic, and construction • Sustained increases in traffic on unsuitable rural roads • Cumulative and long-term impacts on physical and mental health These impacts are: • Under-assessed • Not fully mitigated • Not subject to enforceable controls FINAL POSITION The combined effects of noise, air quality, traffic and long-term disruption represent a significant, cumulative and inadequately controlled impact on human health and residential amenity, weighing heavily against the proposal and further demonstrating that the LDO is inappropriate.
348	NATS Safeguarding	The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted. If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.
349	Individual	I am writing to formally object to the proposed development of 'East Havering Data Centre' on Green Belt land in our area. I strongly believe that permitting this development would be contrary to the purpose of Green Belt policy and would result in significant and lasting harm to the local environment, landscape, and community. First and foremost, the development would result in the irreversible loss and degradation of protected Green Belt land. The fundamental purpose of Green Belt designation is to prevent urban sprawl, preserve open countryside, and safeguard the character of rural areas. Allowing large-scale industrial infrastructure such as a data centre on this land would set a damaging precedent and undermine these core planning protections. The proposal would also have significant environmental consequences. Construction and operation of a large data centre would involve extensive land clearance, hard landscaping, and

		infrastructure installation, all of which would damage local ecosystems. This would inevitably lead to habitat loss and disruption for wildlife that depends on the existing fields, hedgerows, and surrounding natural environment. Additionally, the development raises serious concerns regarding flood risk. Green Belt land and farmland often play an important role in natural drainage and water absorption. Replacing permeable soil with large buildings, roads, and paved surfaces can increase surface runoff, placing additional strain on local drainage systems and potentially increasing flood risk for nearby communities. The site also represents productive agricultural land. At a time when food security and sustainable land use are increasingly important, the permanent loss of farmland for industrial infrastructure is both short-sighted and unnecessary. Once this land is developed, it will be extremely difficult—if not impossible—to return it to agricultural use. Furthermore, data centres are known to consume extremely large amounts of electricity and require substantial cooling infrastructure. This results in high energy demand and associated environmental impacts, including increased carbon emissions where renewable supply is insufficient. The scale of energy consumption and the potential for noise, heat discharge, and infrastructure expansion should be carefully considered before allowing such a development in a rural setting. In summary, the proposal would: Cause permanent damage to protected Green Belt land Harm local ecosystems and wildlife habitats Increase flood risk due to loss of permeable land Remove valuable productive farmland Introduce an energy-intensive industrial facility with associated environmental impacts For these reasons, I respectfully urge the council to reject this application and protect the Green Belt, rural landscape, and natural environment for current and future generations. Thank you for considering my objection.
350	Individual	Dear Sir or Madam, I write as an individual resident to formally object to the proposed Local Development Order for the East Havering Data Centre. Given the scale, permanence and sensitivity of this proposal, I ask that this objection be fully recorded and that written responses address the numbered questions set out below. Please confirm receipt of this email and acknowledge that my objection has been registered. 1. Appropriateness of the Local Development Order Mechanism The proposal involves: • Large-scale industrial buildings • Battery energy storage infrastructure • Significant grid connection works • Permanent development within Metropolitan Green Belt The National Planning Policy Framework states that planning decisions must be transparent, proportionate and properly scrutinised. Given the scale and environmental sensitivity of this proposal, I question whether the use of a Local Development Order is appropriate. An LDO reduces application-specific scrutiny compared to a full planning application process. Questions: What specific policy basis supports the use of an LDO for development of this scale? Why has a full planning application route not been pursued? How will democratic scrutiny be preserved under the LDO mechanism? 2. Green Belt Policy Conflict (NPPF Section 13) The NPPF makes clear that: • The fundamental aim of Green Belt policy is to keep land permanently open. • Inappropriate development is, by definition, harmful. • Very Special Circumstances must clearly outweigh harm. Buildings reportedly up to approximately 21 metres in height, extensive hardstanding, fencing and associated infrastructure represent substantial harm to openness. Questions: What precise “Very Special Circumstances” are relied upon? How has harm to openness been assessed and quantified? What alternative non-Green Belt sites were assessed and rejected? How does this proposal satisfy the permanence objective of Green Belt policy? 3. Environmental Impact and Biodiversity (NPPF Section 15) Planning decisions must minimise impacts on biodiversity and secure measurable Biodiversity Net Gain. The site contains agricultural land, hedgerows and ecological corridors, with protected species considerations previously identified. Mitigation proposals such as an “ecology park” require clear evidence, not assumptions. Questions:

		What baseline biodiversity metric has been applied? What measurable percentage Biodiversity Net Gain is proposed? Who independently verifies the ecological modelling? How is long-term habitat management legally secured and funded? Over what monitoring period will biodiversity outcomes be assessed? 4. Electricity Demand, Carbon and Infrastructure Capacity Data centres are highly energy-intensive developments. The NPPF requires that planning decisions support the transition to a low-carbon future while ensuring resilience. Questions: What is the total projected megawatt demand of the site at full build-out? Has a confirmed grid connection offer been secured? What proportion of energy supply is contractually secured renewable generation? What is the projected annual carbon footprint of the development? How will any backup generation be regulated and monitored? 5. Flood Risk and Water Management (NPPF Section 14) The site is located within low-lying land. Development must not increase flood risk elsewhere and must demonstrate robust surface water management. Questions: What flood zone classification applies to the site? What modelling has been undertaken to assess downstream impact? How will extensive hardstanding affect runoff rates? What cooling system is proposed and what is its projected water demand? 6. Economic Claims and Distribution of Benefit Public communications emphasise job creation and business rate benefits. However, operational employment for data centres is typically limited relative to construction-phase employment. Residents near the site will experience: • Extended construction disruption • Permanent landscape change • Noise and light impact • Increased traffic Economic benefit must clearly outweigh environmental harm under Green Belt policy. Questions: How many permanent full-time equivalent operational roles are projected? What proportion are expected to be locally recruited? What is the projected annual business rate contribution? How has the Council assessed whether economic benefits clearly outweigh permanent Green Belt harm? 7. Procedural Integrity and Public Confidence Ground investigations and site activity have already taken place prior to determination. While potentially lawful, such activity risks creating a perception of inevitability. The NPPF emphasises transparent and fair decision-making. Questions: What safeguards ensure that the determination remains open-minded? How are regeneration promotion functions separated from planning determination? Have all conflicts of interest for officers and members been declared and recorded? Will all technical documents be available in full at the start of consultation? Conclusion For the reasons outlined above, I object to the proposed Local Development Order. The proposal raises significant conflict with Green Belt policy, environmental protection principles and procedural fairness considerations. Given the scale and permanence of the development, I respectfully request that the Council reconsider whether this proposal is appropriate for this site and for determination via this mechanism.
351	Vodafone	Attention:

		Planning Control Havering Council London Borough of Havering Budget Estimate for Diversion/Protection of Vodafone Apparatus Dear Sirs, New Roads and Street Works Act 1991 Re: Diversionary Works to Vodafone Apparatus at Ockendon Road, London Borough of Havering, Greater London, RM14 3PS. Please find the enclosed budget estimate for carrying out the necessary diversion/protection to Vodafone Limited's apparatus due to your proposed works. The estimated cost for these works is £169,304 plus VAT. This estimate is based upon the current information provided, and is for the affected Vodafone network, which includes for any Ex Cable & Wireless, Ex Energis, Ex Thus, and Ex Your Communications networks. This estimate is based upon the current information provided and allows for Full cable diversion of approximately 295m of the existing Vodafone ducts and fibre optic cables away from your proposed work area. Due to the complexity of this scheme, the route of the new duct and fibre cable have been assumed at this stage, however, this will require confirmation via a site survey at C4 stage before costs and timescales can be confirmed. Under the CDM regulations please could you provide us with any risks/hazards that may be associated with these works? As this is a complex full cable diversion scheme, the approximate lead-in time for these works will be a minimum of 20 weeks. Confirmation of timescales should be discussed in more detail at the C4 stage following on-site meetings to discuss your requirements in detail. Please note that where any diversion requires installation on private land, a wayleave agreement will be required. No works will commence until such agreement is in place, following the undertaking of costs and approval of the agreed diversionary route. If you wish to obtain a C4 detailed estimate, the cost of providing this is £4000 plus VAT. From 1 March 2021 HMRC will be introducing a change to the way VAT is collected and administered for any VAT-registered business in the construction industry. Businesses supplying certain construction services will no longer charge VAT on invoices, but instead the domestic reverse charge will now apply. When the domestic reverse charge is applied, it is the responsibility of the customer, rather than the supplier, to account to HMRC for VAT on supplies of the specified goods or services. More details can be found in HMRC's Notice 735. So that Vodafone can determine the correct VAT treatment, we would be very grateful if you could complete the form attached as soon as possible and return to [redacted] Please note that if you do not provide us with this information we will continue to charge VAT. HMRC considers end users to be consumers and final customers. They're businesses, or groups of businesses, that are VAT and Construction Industry Scheme registered but do not make onward supplies of the building and construction services supplied to them. Intermediary suppliers who are also Construction Industry Scheme registered businesses that are connected or linked to end users, and which buy construction services and re-supply them to a connected or linked end user, without making material alterations to the supplies, are also treated a as end users. Further details can be found in https://www.gov.uk/guidance/vat-reverse-charge-technicalguide#end-users-and-intermediary-supplier-businesses All works will be carried out by a Vodafone approved contractor on receipt of your unconditional Order and correct advanced deposit. Please send your official unconditional order and/or payment, payable to "Vodafone Limited", for the attention of [redacted] Vodafone Ltd, Diversionary Works Team, Vodafone HQ, Faraday House G20, Newbury, Berkshire, RG14 2FN. quoting the following reference NRSWA/3.03/011726, where we will take the instruction to proceed. It should be noted that Vodafone operates an annual Network Freeze, which usually commences from on/or around 10th December through to 4th January. During this period no work can be completed on the Vodafone network. This should be taken into account when placing your Order/advanced payment to allow us to programme the Works for all work types including slew/lower and full cable divert schemes, as it will affect any lead-in times quoted within this estimate. (Details of the Network Freeze will be presented nearer the time, upon request, when the confirmed dates become available). For enquiries regarding Vodafone: Mobile, please address your enquiry to [redacted] Please quote the following reference [redacted] on all communications regarding this scheme. This estimate is valid for a period of 3 months from the date of this letter and is based on attaining the proposed levels of cover for the Vodafone duct. Should this cover not be achievable due to obstruction or the presence of other services, the work will be stopped and the requirements reappraised. It should be noted that this is an estimate only and we reserve the right to amend this estimate dependent upon the actual cost of the works. Please note that under the Diversionary Works Code of Practice, Appendix C and the associated Regulations that apply, Promoters are only entitled to one desktop costing per any given scheme. Any change in scope or a subsequent request for a revised costing on the same scheme is then deemed chargeable and will only be reviewed under the C4 Process

		
352	Brentwood Chamber of Commerce	To Whom It May Concern, As proud members of the local and regional business community, I am writing to express our strong support for Digital Reef's East Havering Data Centre Campus. This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project stands to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. We believe the data centre will act as a catalyst for broader business opportunities from supply chain involvement to partnerships in skills development and digital capability-building. Its presence will help foster a stronger ecosystem of innovation, attract further investment, and enhance Brentwood's competitiveness on a regional and national level. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy.

353	Sport England	Thank you for consulting Sport England on the above application. Non-statutory planning advice The proposed development does not fall within our statutory remit (Statutory Instrument 2015/595) and, therefore, Sport England has not provided a detailed response in this case, but would wish to give the following advice to aid the assessment of the application. General planning guidance and advice can be found on our website: · https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Loss of sports facilities If the proposal involves the loss of any sports facility, then full consideration should be given to whether the proposal meets Paragraph 104 of the National Planning Policy Framework (NPPF), is in accordance with local plan policies to protect sport and recreation facilities, and whether it meets any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place. New sports facilities If the proposal involves the provision of a new sports facility, then consideration should be given to the recommendations and priorities set out in any approved Playing Pitch Strategy or Built Sports Facility Strategy that the local authority may have in place. In addition, to ensure they are fit for purpose, such facilities should be designed in accordance with design guidance notes produced by Sport England, or the relevant sport National Governing Body. · Design Guidance notes: http://sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/ Meeting the needs of new housing If the proposal involves the provision of additional housing, then it will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be secured and delivered in accordance with any approved local policy for social infrastructure, and priorities set out in any Playing Pitch Strategy or Built Sports Facility Strategy that the local authority has in place. Our Sports Facility Calculator is a tool that can be used to estimate the additional demand for key community sports facilities from a new population and convert that demand into sport facility requirements with indicative costs. Guidance on how to use the tool is available on the link below. · Sports Facility Calculator: https://www.activeplacespower.com/ Other relevant guidance, tools and contacts Active Design In line with the Government's NPPF (including Section 8) and PPG (Health and wellbeing section), consideration should also be given to how new development, especially new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing or assessing a proposal. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing Sport England's Active Design Guidance: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design Planning conditions We maintain a list of model planning conditions covering issues such as - creation of new playing field, compliance with design guidance notes, sports lighting and community use. Community Use Agreements (CUA) Central Government wishes to see the availability of sports facilities to the wider community when they're not being utilised by the main user, as they see schools being at the heart of local communities. To help with this ambition we have developed a template community use agreement. · Planning Conditions and Community Use Agreements: https://www.sportengland.org/guidance-and-support/facilities-and-planning/planning-sport/planning-applications National Governing Bodies of Sport Although Sport England is not in a position to provide a detailed response on this occasion, where relevant you may wish to consider advice provided by recognised sport National Governing Bodies (NGBs), a list of which is available on our website using the link below: · NGBs: https://www.sportengland.org/guidance-and-support/national-governing-bodies?section=expertise_advice_and_tools-section Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.

354	[redacted]	I am writing to express my support for the development and operation of a local data centre in our area. Data centres are an essential part of modern infrastructure, enabling digital services that support businesses, public services, and everyday life. From cloud computing and online communication to healthcare systems and education platforms, reliable data infrastructure is critical to economic growth and community resilience. The proposed data centre represents a valuable investment in our local economy. It has the potential to create jobs, both during construction and through ongoing operations, while also attracting further technology investment to the area. This can help strengthen the region's position within the digital economy and support long-term economic development. In addition, modern data centres are increasingly designed with sustainability in mind, incorporating energy-efficient technologies and, in many cases, renewable energy sources. With appropriate planning and management, such facilities can operate responsibly while contributing to national and local environmental goals. I also recognise the importance of ensuring that any development is carried out with consideration for the local community, including factors such as traffic, noise, and environmental impact. With proper oversight, these concerns can be effectively addressed. Overall, I believe that the establishment of a data centre would bring significant benefits to the area, and I support its development. Thank you for considering this letter. To Whom It May Concern, [redacted] I am writing to express our strong support for Digital Reef's East Havering Data Centre Campus. This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project stands to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. We believe the data centre will act as a catalyst for broader business opportunities from supply chain involvement to partnerships in skills development and digital capability-building. Its presence will help foster a stronger ecosystem of innovation, attract further investment, and enhance the borough's competitiveness on a regional and national level. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy. To Whom it may concern I hope this message finds you well. On behalf[redacted] I am writing to express our strong support for the East Havering Data Centre Campus development, particularly in relation to the significant skills and training opportunities it will bring to our community. As a local business committed to workforce development and long-term economic growth in Havering, we welcome this forward-thinking investment. We believe the East Havering Data Centre Campus has the potential to become a powerful driver for skills development across the borough. The creation of high-quality technical and digital roles will open new career pathways for local residents, particularly young people and those seeking to upskill or retrain. By fostering partnerships with local schools, colleges, and training providers, the Campus can help ensure that Havering's workforce is equipped with the advanced digital, engineering, and infrastructure skills required for the future economy. From our perspective, the development presents valuable opportunities for apprenticeships, vocational training, and industry-led learning programmes. Access to state-of-the-art digital infrastructure and real-world operational environments will provide practical experience that strengthens employability and supports long-term career progression. For local businesses such as ours, this investment in skills will help build a stronger, more capable local talent pipeline. Beyond individual employment benefits, we see the Data Centre Campus as a catalyst for raising aspirations and enhancing social mobility within the borough. By embedding skills and training initiatives at the heart of the project, Digital Reef can help ensure that economic growth is inclusive and that local residents are directly supported to participate in the digital economy. We are proud to lend our support to Digital Reef's East Havering Data Centre Campus and strongly endorse its commitment to developing skills, creating training opportunities, and investing in the future workforce of Havering. Warm regards
355	Individual	Dear Sir/Madam, I am writing to formally object to the above planning application on the grounds of unacceptable noise impact on residential amenity. The submitted information indicates that the existing baseline noise level at my property is approximately 24 dB, representing an exceptionally quiet environment. The proposed development is predicted to introduce noise levels in the region of 40–65 dB. This represents a substantial increase in noise, which cannot be considered minor or negligible. A rise of this magnitude would fundamentally alter the character of the area and is likely to result in: • Significant disturbance to sleep, particularly during night-time periods • Loss of quiet enjoyment of my home and garden • The need to keep windows closed to maintain reasonable internal conditions This is contrary to the aims of the National Planning Policy Framework, which requires that planning decisions avoid noise giving rise to significant adverse impacts on health and quality of life. Furthermore, the assessment appears unclear as to whether like-for-like noise metrics are being compared (e.g. background noise vs rating level), which raises concerns about the validity of the conclusions. I request that the Local Planning Authority ensures that any assessment is carried out in accordance with BS 4142 and clearly demonstrates the true impact on nearby residential

		receptors. Given the very low existing background level, even modest increases in noise can have a disproportionately harmful effect. The predicted levels suggest that the impact in this case would be substantial and potentially unacceptable. I therefore request that: • The application is refused on noise impact grounds; or • At a minimum, a full and transparent acoustic assessment is required, including: • Clear identification of noise metrics used • Daytime and night-time impacts • Cumulative impacts • Effective mitigation at source (not reliance on residents keeping windows closed) In its current form, the proposal fails to adequately protect the amenity of existing residents. As Head of planning and Public protection I see it as your legal responsibility and obligation to protect those residents that will be affected and impacted from the result of this Data Centre being built so close to our properties. I trust that these concerns will be given full consideration. Surrounded by the new North Ockendon Chernobyl site.
356	Individual	EIA Noise Yes - noise pollution does come under Environmental Impact Assessment (EIA). Why noise pollution is included in EIA An Environmental Impact Assessment (EIA) evaluates all significant environmental effects of a proposed project before it is approved. This includes different types of pollution and environmental changes. • EIA specifically considers emissions and impacts such as air, water, soil, and noise pollution • It also evaluates indirect impacts like increased traffic and noise levels Noise is treated as an important environmental factor because it affects: • Human health (stress, sleep disturbance) • Wildlife and ecosystems • Quality of life in surrounding areas So, during an EIA, a Noise Impact Assessment (NIA) is often carried out as a component. Il What is assessed for noise? Within EIA, noise studies typically include: • Baseline noise levels (existing conditions) • Predicted noise from the project • Impact on nearby receptors (people, wildlife) • Mitigation measures (barriers, silencers, planning changes) On the numbers [redacted], that is a very large change. A move from a current baseline of 22 -24 dB to predicted/background levels of 40-65 dB is an increase of 18 to 43 dB. Because decibels are logarithmic, that is not a small step up; to human hearing, a rise of about 10 dB is often perceived roughly as a doubling of loudness, so the upper end of that range could feel many times louder [redacted]. World Health Organization For a house, the likely effects would be: • At 40 dB outside at night: [redacted] already around the level where WHO says adverse night-noise effects start to be observed, and WHO recommends keeping annual average night noise outside bedrooms below 40 dB(A) to prevent adverse health effects. World Health Organization +1 • At 65 dB outside: that is well above the "quiet residential" sort of environment you appear to have now, and it would very likely affect sleep, ability to open windows, enjoyment of the garden, and general amenity, unless very strong mitigation is provided. WHO also recommends around 30 dB indoors in bedrooms at night for good sleep. World Health Organization

		• Under UK planning guidance, once noise causes things like keeping windows closed most of the time or avoiding parts of the home/garden, that points toward a significant adverse effect, which planning should try to avoid rather than simply accept. GOV.UK For commercial or industrial noise, the key UK assessment method is usually BS4142. Government guidance says BS 4142 is the right method for assessing proposed industrial/commercial sound at residential premises. It also notes there is no single universally acceptable figure, but cumulative "creeping" increases matter, and even around +5 dB over background can be a concern in some cases. GOV.UK +1 So if your true existing background is 24 dB, and the development would create something in the 40-65 dB range [redacted] is: It should not go ahead in that form unless the developer can show, with a proper acoustic assessment, that: • the quoted figures are based on the correct metric and time period; • internal bedroom/living-room limits can still be achieved; • outdoor amenity space remains usable; • night-time peaks and tonal/intermittent noise are controlled; • and the impact is mitigated at source, not just by expecting you to keep windows shut. GOV.UK+2 The biggest uncertain-ty is that "24 dB" and "40-65 dB" n V not be the same measurement type. In noise reports, it matters a lot whether the figures are LA90 background, LAeq average, rating level, daytime vs night-time, or a worst-case maximum. A developer can make a scheme sound acceptable by comparing unlike figures. So the practical answer is: Based on the numbers alone, the impact [redacted] could be substantial and potentially unacceptable, especially at night. [redacted] Whether it should be approved depends on the full acoustic report, [redacted] there is a strong case for objecting and asking the planning authority to scrutinise the noise assessment closely. Paste the exact wording from the noise report and lil tell yor whether they are comparing the righ V ures and whether the figures are LA90 background, LAeq average, rating level, daytime vs night-time, or a worst-case maximum. A developer can make a scheme sound acceptable by comparing unlike figures. So the practical answer is: Based on the numbers alone, the impact [redacted] could be substantial and potentially unacceptable, especially at night. I would not treat this as a minor effect. Whether it should be approved depends on the full acoustic report, [redacted], there is a strong case for objecting and asking the planning authority to scrutinise the noise assessment closely.
357	Individual	Baseline noise test complaint Additional Objection – Inadequate Noise Survey Methodology I have serious concerns regarding the adequacy of the baseline noise survey submitted in support of this application. It appears that the baseline noise levels may have been derived from short-term or “drive-by” measurements rather than robust, long-term monitoring. Such an approach does not provide a reliable or representative assessment of the true background noise environment, particularly in a location where noise levels are very low. Good practice requires that baseline noise levels—particularly where they are as low as those reported (circa 24 dB)—are established using continuous unattended monitoring over multiple days, including representative weekday and weekend periods, and crucially, night-time conditions. Short-duration measurements are highly susceptible to transient events and cannot accurately establish background noise levels (LA90). Without a robust baseline, any subsequent comparison or impact assessment (including those under BS 4142) is fundamentally flawed and risks significantly underestimating the true impact on nearby residents. I therefore request that the Local Planning Authority: • Requires a full, transparent explanation of the measurement methodology • Confirms the duration, locations, and metrics used • Requires additional long-term monitoring if this has not been undertaken Until such information is provided and independently verified, the conclusions of the noise assessment should not be relied upon in determining this application. We was advised initially by Digital Reef (NAME REDACTED)

		That the daily running noise of the Mega Data Centre would be equal to or less than, no greater (louder) than the existing background noise, clearly with the evidence gathered this is clearly not the case.
358	Individual	Generator Noise output of 600MW data centre. This is the noise level that generators would give off In a power supply outage situation which is also way above the Baseline back ground noise levels. Baseline/background noise is the existing sound level [redacted] before the data centre generators run. [redacted]: what noise level might reach my house if a 600 MW data centre had to run on emergency generators for an extended period? A rough answer is: it could be very significant, but the number [redacted] depends mainly on: • how many generators there are, • each generator's acoustic treatment, • how far your house is from them, • whether there are buildings/barriers between you and the plant, • whether exhaust stacks, louvres and cooling air paths are also attenuated. For large diesel gensets, open sets are often around 100–120 dB(A) at 1 m, while the industry often targets around 85 dB(A) at 1 m for enclosed sets; some specially treated installations can be lower. A recent UK data-centre permitting document says its bespoke acoustic canopy reduced each generator pair to 75 dB(A) at 1 m from the exterior of the unit. For scale, one current UK data-centre example uses 12 emergency generators at 3.2 MWe each. A 600 MW site on that sort of generator size would need on the order of about 188 generators to cover the full load, assuming like-for-like sizing. Using that as a rough engineering estimate only, if you assumed: • about 188 generators, • each effectively around 75 dB(A) at 1 m once enclosed, • all operating together, • no strong extra shielding benefit, then the notional combined level from the generator field works out roughly like this in free field: • 100 m: about 58 dB(A) • 200 m: about 52 dB(A) • 500 m: about 44 dB(A) • 1,000 m: about 38 dB(A) Those figures are approximate and can move quite a bit either way, but they show the order of magnitude. If the actual enclosure performance were closer to 85 dB(A) at 1 m rather than 75, add roughly 10 dB to those estimates. That would mean roughly: • 100 m: about 68 dB(A) • 200 m: about 62 dB(A) • 500 m: about 54 dB(A) • 1,000 m: about 48 dB(A) That matters because if your current background is really around 22 dB, even the lower of those scenarios would represent a very large change in character at a nearby house. Also, BS 4142 is the normal UK method for assessing industrial/commercial sound at residential premises, and the impact is judged not just by level but also by context and sound character. Two important points: 1. Extended generator running is not the same as a short emergency test. A long mains outage with full-site generator operation is closer to a temporary industrial plant scenario than a routine weekly test. 2. The worst annoyance may come from tone, exhaust and low-frequency content, not just the headline dB(A). Even if the averaged dB(A) looks moderate, a constant diesel "hum", fan noise, exhaust breakout, and louvre noise can be much more intrusive than the same number from road traffic.

		So [redacted] • At 100–300 m from a 600 MW generator-backed site, there is a real possibility of material to severe residential impact unless the acoustic design is exceptional. • At 500 m, it could still be very noticeable in a quiet area. • At 1 km, it may still be audible, especially at night, depending on topography and shielding. If you tell me how far your house is from the proposed generator compound, I can turn this into a much tighter estimate for your property.
359	Individual	Letter of complaint and objection Havering Council response letter to lodge with council on the QR code Copy of my objection, to LDO and the application to be this Huge Mega Data Centre, in North Ockendon. 1. Introduction [redacted] Noise Dust Vibration Mud on the roads While I recognise the importance of digital infrastructure to the UK economy, the proposed mechanism and location raise serious concerns in relation to: Green Belt protection environmental impact infrastructure capacity planning governance the strategic use of land within the borough. In particular, the proposal seeks to grant long-term permitted development rights for a large-scale data centre campus through a Local Development Order, potentially enabling development of up to approximately 400,000 m^2 of floorspace, including around 340,000 m^2 of data centre use, alongside other associated infrastructure and facilities. This represents a development of regional significance and should therefore be subject to the full scrutiny of the planning application process, rather than being effectively pre-approved through a broad LDO framework lasting many years. 2. Misuse of the Local Development Order Mechanism The use of a Local Development Order for a development of this scale is deeply concerning, being used for the development of the largest Data Centre in Europe. LDOs are typically intended to facilitate minor or routine forms of development, streamline small-scale regeneration, or support development within clearly defined parameters. However, the proposed order: permits development across multiple build zones enables a large-scale campus-style development operates across multiple phases over a potentially long period of 10-20 years, allows significant future development without individual planning applications. The effect is that once the LDO is adopted, substantial elements of the development may proceed with limited future democratic scrutiny, subject only to prior notification or condition discharge procedures. This approach risks: undermining public confidence in the planning system preventing residents from meaningfully scrutinising future phases of development reducing oversight of cumulative environmental impacts. Given the strategic scale of the proposal, the development should instead be considered through individual planning applications, enabling proper assessment of each phase and ensuring accountability, and not just be forced through the SPC by 3 HRA councillors who at no stage asked 1 single question, and I bet if they was asked by a judge in a court of law have not read and understood all 2900 pages, in the report.

		3. Conflict with Green Belt Policy A central concern is the potential use of Green Belt land for this development. National planning policy provides strong protection for Green Belt land, recognising its importance in: preventing urban sprawl safeguarding the countryside from encroachment preserving the character of towns and villages providing open space for communities, this development will come within 1 Greenbelt field of bumping into the new housing development of Horndon St Mary just recently passed by Thurrock Borough Council so without doubt there is urban Sprawl as both Burroughs are going to be nearly touching. Large-scale industrial development within the Green Belt is normally regarded as inappropriate development unless very special circumstances can be clearly demonstrated. In this case, the justification appears weak for several reasons. Lack of site necessity There is insufficient evidence that a development of this nature must be located on Green Belt land. Digital Reef advised us that this site was chosen because of its connection to the Warley Sub station, which was the only Substation in the UK with the spare capacity to supply enough power for this 600 MV Hyper Scale Data Centre. Data centres are commonly developed on: brownfield sites or on former industrial land logistics or infrastructure zones. Given the scale of development proposed, it is reasonable to expect that alternative brownfield sites should have been rigorously assessed before proposing development on protected land. Permanent land-use change The development would introduce large-scale built infrastructure into what is currently open land, resulting in permanent alteration of the landscape, this would dramatically reduce the views of the openness from our property. Unlike many forms of temporary development, data centre infrastructure is typically long-lived and difficult to reverse, meaning the impact on the Green Belt could be effectively permanent. 4. Environmental and Landscape Impact The proposal also raises significant environmental concerns. While the consultation documents include references to landscaping and ecological mitigation measures, such mitigation cannot fully compensate for the loss or transformation of open land. Large data centre campuses typically introduce: extensive buildings and plant equipment high levels of external lighting mechanical cooling infrastructure security fencing and controlled access points. These features fundamentally alter the visual character of the landscape. Although the proposal includes an ecology park and landscaping measures, such interventions should not be treated as equivalent replacements for natural landscape or biodiversity value. There is also a risk that ecological measures may be implemented later in development phases, meaning environmental benefits could be delayed or reduced relative to the immediate impact of construction. 5. Infrastructure and Energy Demand Data centres are among the most energy-intensive forms of development. A campus of the scale proposed would require extremely significant: electrical grid capacity cooling infrastructure utility connections. The consultation documents indicate the presence of a district heating energy centre and associated infrastructure, suggesting substantial supporting energy facilities will be required. However, there is limited clarity regarding: how power demand will be supplied whether local grid infrastructure can support this demand the potential impact on energy resilience within the region.

		Without detailed analysis, there is a risk that the development could place considerable pressure on local infrastructure networks. 6. Transport and Travel Assumptions The Travel Plan indicates that staff access to the site will rely heavily on private car use, reflecting the limited public transport connectivity of the proposed location from both Upminster and South Ockendon rail stations. All contractors will commute using public transport and will be bussed in from these 2 railway stations. This raises concerns about: increased traffic on rural roads congestion during construction phases environmental impacts associated with car dependency. Major developments in areas with limited public transport provision should be carefully assessed to ensure transport impacts are properly mitigated. You have advised us there will be an added allowance of about 500 extra traffic movements per day. 7. Limited Local Economic Benefit While digital infrastructure is important nationally, large data centres typically generate relatively limited local employment once operational. Compared with other forms of development occupying comparable land areas, the employment density of data centres can be low. Once open this Data Centre with have more security personnel and grounds maintenance staff than computer technicians inside the server halls. This raises a strategic planning question: Is it appropriate to allocate large areas of land — particularly protected land — to development that may provide relatively limited long-term employment or community benefit? This question becomes particularly important when considering the opportunity cost of land use, especially where alternative development opportunities might deliver greater social or economic value. 8. Governance and Amendment Mechanisms The consultation documents indicate that the LDO framework includes mechanisms allowing: prior notification procedures discharge of conditions non-material or minor material amendments. While such mechanisms are common within planning frameworks, their use within a large-scale LDO development raises concerns about transparency. Significant design changes could potentially occur without full public consultation, limiting the ability of residents to review future alterations to the scheme. 9. Strategic Planning Considerations The proposal must also be considered within the wider strategic planning context. The London Plan emphasises: sustainable development protection of open space careful management of infrastructure demand. Large data centre developments should ideally be located in areas where: energy infrastructure already exists transport connectivity is strong environmental impact can be minimised. The proposed location appears to struggle to meet several of these criteria. Electricity supply, New water supply, Waste water The main access road is a Lane Not an A Road or a B Road,

		The B Road at the top is accessed by the B186 which connects Fen Lane to the A127 and crosses the Main London to Southend C2C railway line. This bridge is the only accessible to HGV Lorrie's the other 3 have had recent weight restrictions put on them, however this bridge has a sharp bump back on it and has a tight width with reduced footpaths, no 2 HGV Lorrie's can pass each other at any one time safely on this bridge. 10. Conclusion For the reasons outlined above, I strongly object to the proposed East Havering Data Centre Campus Local Development Order. In summary: The Local Development Order mechanism is inappropriate for a development of this scale in a rural area such as the Metropolitan Green Belt of North Ockendon. The proposal risks inappropriate development within Green Belt land. Environmental and landscape impacts appear insufficiently justified. The development may place significant pressure on infrastructure, particularly energy networks. Transport assumptions rely heavily on private vehicles. The local economic benefits appear limited relative to the scale of land use. Given these concerns, the council should decline to adopt the proposed Local Development Order and instead require that any development of this nature be brought forward through individual planning applications subject to full scrutiny. This would ensure that environmental, infrastructure, and community impacts are properly assessed before development proceeds. We was advised at the various meetings and discussions with Digital Reef [redacted] that the noise emissions from the Data Centre when operational cannot exceed the current background noise, they can only be equal to or less than the current noise emissions in the local vicinity. Do you have any idea what they are currently, because if you did you would not have picked this location with residents within such close proximity as [redacted] Corner Farm, Corner Farm Cottages, Top Meadow golf course and resort, Ladyville Lodge retirement home, plus the other numerous residents in the surrounding area. Stats and facts quote that Data Centres emit sounds of about 40dB - 65 dB when operational. I think you are going to have a major problem with certain residents as you are going to be breaking the law. I can see a major claim for damages and compensation in the future.
360	Individual	[redacted] immediate Noise & Vibration survey carried out by a professional auditor over a 5-7 day period for a period of 24 hours a day. PDF attached - see separate document for info
361	Individual	Dear Sirs, As a concerned resident of Upminster, I wish to strongly object to the planned building of a Data Centre in North Ockenden, Havering. I set out below some of the seemingly endless reasons why this idea should not be approved to go ahead. 1. The improper use of a Local Development Order for a significant development on Green Belt land. The Council has very little experience of LDOs - "A fundamental component of delivering & developing a Local Development Order is to ensure that there is effective engagement with all relevant stakeholders" -(Guidance to councils on Preparing LDOs section 3.3). No knowledge has been shown by the council of current ecology and biodiversity in N. Ockendon and certainly no concerns for the lives or well-being of the residents. (The handling of this issue is being looked at by a Barrister.) 2. Although exact figures given by the council have varied, the plot is around the size of 14 football pitches (going on 500 hectares) of Green Belt, a large part of which is a Conservation Area where local home owners have had greatly restricted rights on what they can build on, or add to, their properties. To try to justify this destruction of our Green Belt land (which is still growing foodstuffs such as barley & wheat..) there has to be clearly defined "Very Special Circumstances", but the council has yet to declare what these supposedly are. 3. Accepting that some data centres will be needed nationally, and some already built in more appropriate areas, such as brownfield sites, and possibly next to a water source, it still abuses the argument that data centres are construed as national infrastructure. That is not a justification for siting them in any old place, and certainly not on prime Green Belt land. 12 to 15 planned buildings (up to 21 metres high) each encased by minimum 6 metre high fences will mean very little green will be visible anywhere. Part of the Green Belt legacy is to stop 'urban sprawl' but in Havering there are already an unwarranted number of potential over developments which will encroach greatly on our valued green and open countryside (i.e.Lower Thames Crossing, Battery Storage in Cranham, new housing at Benets Road...this data centre would set another precedent which would make further development even more likely to follow.) Neighbouring boroughs already have their own building plans right up to the borders. 4.The effects of such building would be catastrophic to the vast amount of natural wildlife on this area of Green Belt: badgers, foxes, newts, toads & frogs, plus a huge number of various species of birds. The developer estimates up to ten years for construction and when the terrified wildlife is forced from its environment early on, it is extremely unlikely to ever return. Why would a data centre be classified as an 'exceptional case' in order to justify damage and destruction to the naturally occurring environment. The site in question is a very extensive open & green area, with

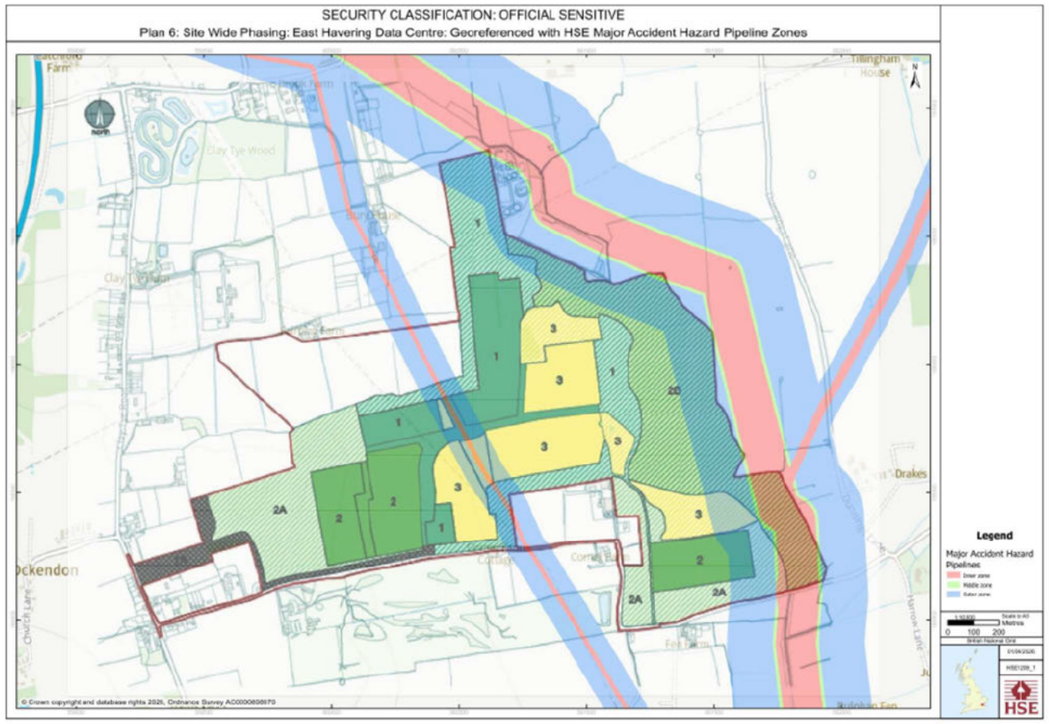
		growing crops, established hedgerows and ancient trees. There is a SINC in place (Site of Interest for Nature Conservation) on the location, plus several other SINCs close by and it is right next to a conservation area. These SINCs will contain details of endangered species listed by Friends of the Earth. This site is simply inappropriate for a data centre development, and its very plan underlines the need for official regulating of all future applications. 5. In attempting to define benefits this data centre would provide, the council has stated these would go to Havering and not the local community deeply affected by its construction. Leader of the council speaks of improving Havering's reputation and the catalyst for other businesses - again this would not be in the historic village of North Ockendon, so how can this be a 'Local Development'? The council is cash-strapped and keen to receive the substantial business rates a data centre would incur. However Digital Reef are unable to use this financial gain as a plus in the planning application. At the first meeting between residents and the council in March, I personally asked the planners to detail any benefits felt by residents living around data centres already built by Digital Reef. Nobody was able to give a response because Digital Reef have never built a data centre before. This complete lack of experience and knowledge cannot give any comfort or confidence in the expertise required to deliver an essential outcome. 6.There is an ecology park proposed as part of the site, which is already a natural area of Green Belt land, not accessed by public transport - more environmental damage from vehicles (should people want to take a walk amongst 21 metre high humming buildings) may bring more harm than help. Despite the promise of whips being planted as screens, this shows complete ignorance f ecology. Ecosystems can take hundreds of years to develop and build up, and simply cannot be replicated with a few weeks of planting. Digital Reef's claim of 100% net biodiversity gain s simply unreal. 7. The negative impact to the area visually will be huge. Besides all the vast 21 metre high buildings, there will be generators, cabling, roof-top equipment. Unsightly bunds will be created as screening - bunds are mounds of earth, covered in grass. These will supposedly then be planted with young tree whips, again taking many years to grow before providing any sort of visual barrier, and never masking buildings that stand 21 metres high. Buildings that make a constant noise: a soul destroying 24 hour a day hum, causing stress, and local residents could be subject to as yet unknown health damage in the long term. These data centres also produce CO2 (more than aircraft do) thus contributing to global warming. Each new data centre will exacerbate the problem. 10 years of construction will create carbon emissions, plus the manufacturing of necessary materials used will have created 'embodied carbon'. Unless electricity is generated from wind or solar power, it is not 100% green, and as the UK does not have a green supply of electricity, it also creates carbon emissions. This data centre could use as much electricity as 50,000 homes! Digital Reef's claim of 'zero carbon' emissions is impossible nonsense. 8. Excessive quantities of water are needed for cooling. No estimates have been provided as yet, as to the amount this data centre will require, but it can be around 5 million litres PER DAY! That would supply tens of thousands of houses. Where would this water originate from, and where would it go after use as a coolant? There has recently been a claim that the cooling can be done chemically; which raises questions of pollution and safety issues. Not just here, but across the world, data centres are being blamed for causing water shortages. There are no doubt more negative reasons why this planned data centre is an abomination that would blight the lives of everyone living around it, during the years of construction, and the ensuing ten years or so, which is apparently the approximate length of its 'useful life'. And once it is built, the Green Belt will no longer be in existence and cannot be retrieved. So another developer could knock down what took ten years to put up, and build a housing estate, making sure the historic village of North Ockendon is no more. An unpalatable future where any new residents have no memories of our green and pleasant land. Respectfully, current residents and their families deserve so much more from the administration that serves them.
362	CEME	As a proud member of the Havering business community, I am writing to express our strong support for Digital Reef's East Havering Data Centre Campus. This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project stands to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. We believe the data centre will act as a catalyst for broader business opportunities from supply chain involvement to partnerships in skills development and digital capability building. Its presence will help foster a stronger ecosystem of innovation, attract further investment, and enhance the borough's competitiveness on a regional and national level. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy
363	CEME	On behalf of CEME, I am writing to express our strong support for the East Havering Data Centre Campus development, particularly in relation to the significant skills and training opportunities it will bring to our community. As a local business committed to workforce development and long-term economic growth in Havering, we welcome this forwardthinking investment. We believe the East Havering Data Centre Campus has the potential to become a powerful driver for skills development across the borough. The creation of high-quality technical and digital roles will open new career pathways for local residents, particularly young people and those seeking to upskill or retrain. By fostering partnerships with local schools, colleges, and training providers, the Campus can help ensure that Havering's workforce is equipped with the advanced digital, engineering, and infrastructure skills required for the future economy. From our perspective, the development presents valuable opportunities for apprenticeships, vocational training, and industry-led learning programmes. Access to state-of-the-art digital infrastructure and real-world operational environments will provide practical experience that strengthens employability and supports long-term career progression. For local businesses such as ours, this investment in skills will help build a stronger, more capable local talent pipeline. Beyond individual employment benefits, we see the Data Centre Campus as a catalyst for raising aspirations and enhancing social mobility within the borough. By embedding skills and training initiatives at the heart of the project, Digital Reef can help ensure that economic growth is inclusive and that local residents are directly supported to participate in the digital economy. We are proud to lend our support to Digital Reef's East Havering Data Centre Campus and strongly endorse its commitment to developing skills, creating training opportunities, and investing in the future workforce of Havering
364	London Riverside BID	I am writing to express the London Riverside BID's support for Digital Reef's East Havering Data Centre Campus. This ambitious development represents a major investment in local infrastructure, skills, and innovation. The project has the potential to drive economic growth, create high-value employment, and position Havering as a strategic location for digital and technological advancement. Given the scale of investment, we expect the data centre to act as a significant catalyst for broader business opportunities from supply chain contracts to partnerships in skills development and digital capability-building. Its presence should foster a stronger ecosystem of innovation, attract further investment, and enhance the borough's competitiveness on a regional and national level. It should catalyse knowledge, capability and investment in green and blue infrastructure, biodiversity initiatives and climate resilience across the Borough, offering both skills development and

		employment opportunities in environmental and climate sectors. This potential, however, must be harnessed through strong oversight and management by the Council, with appropriate key performance indicators and monitoring. This will require the implementation of mechanisms to drive partnerships with stakeholders such as the BID and other major investments taking place locally, for example via the Thames Freeport, SEGRO and Beam Park Station and housing development. Anything short of a collaborative approach will only serve to further disengage communities, and so meaningful partnership working must not only be a central pillar of the approval of this application, but also properly funded and managed. We welcome Digital Reef's commitment to engaging with local businesses and look forward to working collaboratively to maximise the benefits for our community and economy.
365	Quantum	On behalf of Quantum Training, I am writing to express our strong support for the East Havering Data Centre Campus development, particularly in relation to the significant skills and training opportunities it will bring to our community. As a local business committed to workforce development and long-term economic growth in Havering, we welcome this forward-thinking investment. We believe the East Havering Data Centre Campus has the potential to become a powerful driver for skills development across the borough. The creation of high-quality technical and digital roles will open new career pathways for local residents, particularly young people and those seeking to upskill or retrain. By fostering partnerships with local schools, colleges, and training providers, the Campus can help ensure that Havering's workforce is equipped with the advanced digital, engineering, and infrastructure skills required for the future economy. From our perspective, the development presents valuable opportunities for apprenticeships, vocational training, and industry-led learning programmes. Access to state-of-the-art digital infrastructure and real-world operational environments will provide practical experience that strengthens employability and supports long-term career progression. For local businesses such as ours, this investment in skills will help build a stronger, more capable local talent pipeline. Beyond individual employment benefits, we see the Data Centre Campus as a catalyst for raising aspirations and enhancing social mobility within the borough. By embedding skills and training initiatives at the heart of the project, Digital Reef can help ensure that economic growth is inclusive and that local residents are directly supported to participate in the digital economy. We are proud to lend our support to Digital Reef's East Havering Data Centre Campus and strongly endorse its commitment to developing skills, creating training opportunities, and investing in the future workforce of Havering.
366	Individual	As a concerned resident of Upminster, I wish to object to the planned building of a Data Centre in North Ockendon, Havering. I set out below reasons why the planning of this data centre should not be approved:- Improper use of a Local Development Order for a significant development on Green Belt land. " A fundamental component of delivering & developing a Local Development Order is to ensure that there is effective engagement with all relevant stakeholders" -(Guidance to councils on Preparing LDOs section 3.3). No knowledge has been shown by the council of current ecology and biodiversity in N. Ockendon. The plot on Green Belt land, a large part of which is a Conservation Area as well as other parts being used to grow foodstuffs. The "Very Special Circumstances" required to gain permission to use this type of land are yet to be declared by the council. Part of the Green Belt legacy is to stop 'urban sprawl' but in Havering there are already an unwarranted number of potential over developments which create this. (i.e.Lower Thames Crossing, Battery Storage in Cranham, new housing at Benets Road) The negative impact to the area the data centre will bring. Buildings that make a constant noise. The possibility of local residents being subjected to unknown health damage in the long term. Data centres produce CO2 (more than an aircraft does) thus contributing to global warming. Each new data centre will exacerbate the problem. 10 years of construction will create carbon emissions, manufacturing of necessary materials used will have created 'embodied carbon'. Unless electricity is generated from wind or solar power, it is not 100% green, and as the UK does not have a green supply of electricity, it also creates carbon emissions. This data centre could use as much electricity as 50,000 homes. Digital Reef's claim of 'zero carbon' emissions is impossible. Excessive quantities of water are needed for cooling. No estimates have been provided as yet, as to the amount this data centre will require, but it can be around 5 million litres per day. There has recently been a claim that the cooling can be done chemically; which raises questions of pollution and safety issues. Not just here, but across the world, data centres are being blamed for causing water shortages. I await your comments and confirmation my objection has been officially noted and taken into account.
367	Individual	Please see my independent noise survey carried out at my property, the baseline background noise at the rest period is 24 db You mention this being 45db this is total fabrication, and no stage did I see a noise survey being carried out over a fixed period on the proposed site, can you please provide evidence of your sound equipment and photos and a map of when and where you carried this out, as the sound reading results would have been even lower than mine had you carried this out on the land in the centre of the proposed development as there is no sound there what so ever. Your sound tests was carried out [redacted] This is not a credible noise report for a development of this type. Immediate Noise & Vibration survey carried out by a professional auditor over a 5-7 day period for a period of 24 hours a day

368	Individual	I am writing to formally object to the proposed Local Development Order for the East Havering Data Centre Campus. I believe this project represents a harmful development that fails to meet the legal requirements for construction on Green Belt land. My objections are based on the following planning considerations: • Inappropriate Development on Green Belt: The applicant has failed to demonstrate the "Very Special Circumstances" required by the NPPF. The economic benefits do not outweigh the permanent loss of openness in this protected rural area. An eco system will be destroyed. • Harm to Rural Character: The massive industrial scale of these warehouses is entirely incongruous with the rural character of North Ockendon and the surrounding borough. This represents significant "urban sprawl." • Noise and Light Pollution: The 24/7 operation of high-capacity cooling fans will create a constant low-frequency hum, disrupting the tranquility of the area. Additionally, security lighting will destroy the "dark sky" status of this rural pocket. • Traffic and Infrastructure Strain: The local road network (B186, Fen Lane, and A127 junctions) is unsuitable for the volume of HGVs and operational traffic. This will lead to increased congestion and safety hazards for all residents. • Resource Consumption: I am concerned about the massive water requirements for cooling and the air quality impact from the regular testing of large-scale backup diesel generators. • Procedural Unfairness: The use of a Local Development Order (LDO) bypasses the necessary granular scrutiny of individual planning applications and removes the community's voice in future phases of the project. I urge the Planning Committee to reject this LDO and protect Havering's Green Belt.
369	Individual	I am writing to formally submit my objection to the proposed Local Development Order for the East Havering Data Centre Campus in North Ockendon. As a resident, I believe this project represents an inappropriate and harmful development that fails to meet the legal requirements for construction on Green Belt land. My objections are based on the following material planning considerations: 1. Inappropriate Development on Green Belt Land I do not believe the applicant has demonstrated the "Very Special Circumstances" required by the National Planning Policy Framework (NPPF) to justify this scale of development on Green Belt land. • The permanent loss of openness in this area cannot be mitigated by an "ecology park." • There is no evidence that this facility must be located on this specific Green Belt site rather than on existing brownfield land within the wider region. The desire for proximity to a power grid should not override the fundamental protections afforded to the Green Belt. 2. Harm to Rural Character and Visual Amenity The proposed data halls are industrial in scale and entirely incongruous with the rural character of North Ockendon. • The height and massing of these "windowless warehouses" will dominate the landscape, destroying the current visual amenity of one of the few remaining rural pockets in the borough. • This project represents significant "urban sprawl," effectively merging the industrial edge of the M25 into our quiet countryside. 3. Impact on Residential Amenity (Noise and Light Pollution) The 24/7 nature of this facility poses a severe threat to the quality of life for nearby residents in North Ockendon and Cranham. • Noise: The constant low-frequency hum from high-capacity cooling fans is well-documented in other data center developments. I am concerned that the cumulative noise impact has not been sufficiently modeled for a quiet, rural environment. • Light: The security and operational lighting required for a site of this size will result in significant "sky glow," ending the dark-sky status of this area and disrupting local wildlife and residents alike. 4. Highway Safety and Traffic Congestion The local road network, specifically the B186 and Fen Lane, is entirely unsuitable for the volume of traffic this project will generate. • During the multi-year construction phase, the influx of Heavy Goods Vehicles (HGVs) will create safety hazards on narrow roads and lead to gridlock at the junction with the A127 and M25. • The "travel improvements" suggested to Upminster and Ockendon stations do nothing to alleviate the physical pressure of operational traffic on our residential roads. 5. Sustainability and Resource Strain I am deeply concerned about the environmental footprint of a facility of this magnitude. • Water Usage: Data centers require millions of liters of water for cooling. I see no guarantee that this will not impact local water pressure or place an undue burden on our already strained water utility infrastructure. • Energy: The carbon footprint of the backup diesel generators, which must be tested regularly, poses a risk to local air quality and contradicts the council's own climate goals. 6. Procedural Concerns Regarding the LDO

		Finally, I object to the use of a Local Development Order for a project of this complexity. The LDO process bypasses the granular scrutiny of individual planning applications, granting "blanket" permission that removes the community's ability to challenge specific building designs or environmental impacts in the future. Furthermore, the 28-day consultation period for a 3,000-page proposal is insufficient for meaningful public engagement. Conclusion For the reasons stated above, I urge the Planning Committee to reject this LDO. The economic promises of this project do not outweigh the irreversible destruction of Havering's Green Belt and the long-term detriment to the local community.
370	Individual	OUR objections are The site is on GREEN BELT LAND and is the only working fenland in London. With outstanding views across farmland It will also coincide with THE LOWER THAMES CROSSING project, which will cause Mayhem To the village...
371	Health and Safety Executive	THE TOWN AND COUNTRY PLANNING (DEVELOPMENT MANAGEMENT PROCEDURE) (ENGLAND)ORDER 2015 PROPOSAL: DATA CENTRE CAMPUS AND ASSOCIATED DEVELOPMENT LOCATION: LAND NORTH OF FEN LANE, NORTH OCKENDON 1.The Health and Safety Executive (HSE) is a statutory consultee for certain developments within the Consultation Distance of Major Hazard Sites/ pipelines. The proposed development site identified in LDO 0001.26 lies within the outer, middle and inner consultation zones for three major accident hazard pipelines - Hordon / Abridge (2) pipeline operated by Cadent Gas Ltd, 18 Feeder Stapleford Tawney/ Tilbury Thames North pipeline operated by National Gas and Mardyke / Stock (63) pipeline operated by Cadent Gas Ltd. The details for the Major Accident Hazard Pipelines and their associated HSE zones are: Name: Hordon / Abridge (2) HSE Ref: 8146 Transco Ref: 2405 Operator: Cadent Gas Ltd HSE Consultation Zones Inner Zone (in metres): 9 Middle Zone (in metres): 9 Outer Zone (in metres): 75 Name: 18 Feeder Stapleford Tawney/ Tilbury Thames North HSE Ref: 8191 Transco Ref: 2450 Operator: National Gas HSE Consultation Zones Inner Zone (in metres): 78 Middle Zone (in metres): 90 Outer Zone (in metres): 270 Name: Mardyke / Stock (63) HSE Ref: 8169 Transco Ref: 2428 Operator: Cadent Gas Ltd HSE Consultation Zones Inner Zone (in metres): 17 Middle Zone (in metres): 27 Outer Zone (in metres): 6 2. HSE has superimposed the consultation zones for the pipelines onto the map of landscaped character areas taken from the 'Appendix 2-LDO Plans 1-6' in the Local Development Order documentation (Appendix 1 at the end of this letter). 3. From the documents in the Local Development Order there are data centre buildings, landscaping, indoor use by the public, outdoor use by the public and transport links in the proposed development. The proposed development is in the inner, middle and outer consultation zones.

		Workplaces – data centre buildings • It appears that none of these buildings will be in the inner zone, therefore HSE does not advise against these buildings. Indoor Use by the Public – visitor centre • HSE does not advise against indoor use by the public if it is located in the outer consultation zone or if it is not within zones. Outdoor Use by the Public • It is not clear from the plan whether facilities such as sports pitches, play areas, picnic tables which encourage people to congregate outdoors are proposed within any of the zones. HSE advises against facilities which encourage people to congregate outdoors when proposed in the inner consultation zone. Such development is not advised against when proposed in the middle and outer zones if not more than 100 people would be present at one time. Transport Links • HSE does not advise against single carriageway roads, cycle paths and footpaths without facilities for people to congregate in the inner, middle or outer zone. Landscaping • HSE does not advise against landscaping in any consultation zone. 4. In summary, based on the limited information provided in the 'Appendix 2-LDO Plans 1-6' and applying HSE's LUP methodology, HSE does not advise against Local Development Order LDO 0001.26 if the proposed development meets the criteria described above for data centre buildings locations, indoor use by the public and outdoor use by the public. Please note that HSE should be reconsulted if more detail becomes available on development proposed within the zones. 5. As the proposed development is within the consultation distance of three major accident hazard pipelines, you should also consult Cadent Gas and National Gas. There are two particular reasons for this: • The operator may have a legal interest (easement, wayleave, etc.) in the vicinity of the pipeline. This may restrict certain developments within a certain proximity of the pipeline. • The standards to which the pipeline is designed and operated may restrict occupied buildings or major traffic routes within a certain proximity of the pipeline. Consequently, there may be a need for the operator to modify the pipeline, or its operation, if the development proceeds. 6. It has been assumed that no hazardous substances will be present at or above the controlled quantities in the Planning (Hazardous Substances) Regulations 2015.

		
372	Julia Lopez MP	East Havering Data Centre Consultation, LDO0001.26 As you will be aware, the Council's proposals for a data centre on land at North Ockenden, in my constituency, have generated considerable concern. My constituents remain very deeply concerned that the Council has chosen to consult for only 30 days rather than a longer 12 week period, despite the vast amount of documentations included as part of the consultation, tunning to close to 3,000 pages. You will, of course, be aware of the legal challenge lodged by a residents group on this point. In terms of the wider issues, I have enclosed anonymised copies of the correspondence that I have received in relation to the data centre, aside from the issue of the consultation length, and have summarised my constituents major concerns below: • Green belt location: the project fails the 'very special circumstances' test to allow development on green belt land, and that it should, instead, be built on brownfield land • Use of Local Development Order (LDO): the LDO process is inappropriate, and bypasses the scrutiny needed for a project like this. • Infrastructure: local grid and water capacity is not resilient enough, nor is the local road network, especially alongside the planned Lower Thames Crossing project. • Environmental harm: including destruction of plant life, wildlife, and topsoil, as well as noise from cooling fans and generators. • Heritage risk: the plans do not protect the Grade II listed Bullens Farmhouse • Rural character: the project will industrialise North Ockenden with buildings and overwhelm the narrow rural lanes with HGVs, which will permanently change the character of the area. I am grateful for you considering the deeply-held views of my constituents as part of this consultation and would be grateful for your assurance that this will be the case as a decision is made I'm concerned by the plan by London Borough of Havering to build a huge Data Centre in North Ockendon, in small country roads, on green belt land, in a small village community, and close to other planned works for the Lower Thames Crossing. This defies planning policy regarding use of green belt land, once built it will change the area making it easier to justify more and simitar construction works in the future, and is not any sort of unique project which can justify being built in this Location. While we are insisting that housing should be accommodated within brownfield sites in order to retain green belt and, it seems unacceptable to consider building an industrial. site in the middle of green belt. I would be grateful to know your views on this, and what action (if any)you are taking to support the residents who are objecting to this plan, and to hold the council to account. Thankyou ** I attended the second of the "consultation" events Havering Council was hosting about its draft LDO to build a mega Data Centre on Green Bett land on Fen Lane, touching the border with

		Thurrock to the South and to the East of the site. Planned 10 buildings with 4OO,O00 sqm, yes, square meters not square feet! On top of this there is plans for a visitor centre. The amount of power required means until the Warley substation is substantially upgraded the centre could only operate at less than half capacity. There will be a massive water requirement for cooling ,24/7 /365. Water is becoming a greater scarce resource with our changing climate. T his massive site sits in prime north Kenton Metropolitan Green Bett and in the North Ockenden Conservation area. The feelings of locals in the room against this site was palpable The Council presentation was so poor. No benefits about the site, why Havering should have it let atone why this site is perfect. However, what smells really bad is it isn't going through the usual planning permission route but an LDO which once granted allows buildings to commence up to 20 years from now!! I can't see why Havering needs this unit, let alone why prime Green Belt rather than a brownfield site is best for this almighty targe building. There is no security consideration, in a quiet rural country lane I would argue is not the site for what the Government is pushing as "Critical National Infrastructure" ** Many years ago there were whole floors or whole buildings that had computer mainframes in. As technology moved on less and Less space was required and my iPad holds a 100,000 times more than a 1970's mainframe. Should we be allowing data centres to destroy our green bel.t and farmland when we know in a few years time the continuing need for such space is unlikely to be necessary and wil Be superseded by technological innovation? ** Many residents have significant concerns about its possible impacts, including effects on local infrastructure, traffic, environmental quality, energy and water usage, noise, and the long-term character of the community. These issues directly affect the day-to-day lives of those who live nearby and therefore warrant particularly careful consideration. one of the great aspects of living in Havering is its proximity to green space combined with easy access to London. lf urban sprawl is left unchecked the few mites between Upminster and Laindon to the East will be filled in by this and other developments such as the huge housing developments planned for West Herndon and elsewhere. The data centre will. be built on 175 acres of virgin green belt land, destroying the land, ecology, plant Life and wildlife. lt is absolutely scandalous that this site is even being proposed, surely there must be a more suitable brownsite near by?? The countryside there will be ruined, and residents do not realise the impacts on their lives and also the implications for future generations. Apart from the question of the decimation of the land, there is also the question of electricity and water usage. The developers, Digital Reef have already carried out tests on the grounds, without permission from Havering Council[, which shows the lengths they are prepared to go to. I believe there has also been a delisting of Bullens and Herds farmhouse, a Grade 2 listed building which stands on the land. Apparently, if a Listed structure is present on land, an LDO cannot be pursued. Strangely, it happened, without the required Building Consent Order and with no enforcement by the Council on the the Land owner. Digital. Reef do NOT own the Land in question. ** increased Traffic: The construction phase will bring a substantial volume of traffic to our area, disrupting daily Life and increasing the risk of accidents. Utility Demand: The data centre will place a huge demand on local utilities, potentiality straining our existing resources. Environmental impact: There will be a massive impact on our environment and local wildlife, which we are keen to protect. Noise Pollution: The construction and operation of the data centre will introduce significant noise pollution, affecting the quality of Life for residents. CO2 Emissions: The project will contribute to CO2 emissions, contrary to our efforts to combat climate change. Mental Health: Many community members already struggle with menta health issues, and this project is exacerbating their stress and anxiety, particularly as we feel our concerns are not being heard by a council burdened with debt. **

		We are residents of North ockendon, and are concerned about the HUGE development on the green belt on the beautiful fen Land ** Many local residents (myself included) do not want it, on our green belt, guzzling energy and consuming vast quantities of water, necessary for already here humans, farms, wildlife and the land.
373	[redacted]	[redacted] Response to Consultation on East Havering Data Centre. Introduction: an inappropriate development, and an unreasonable and unfair consultation. These notes are not as complete as we would have liked. That is, some sections include points we wanted to complete, after checking with the documentation, but it has proved impossible to scrutinise all the documents in the limited time available. The LDO process, especially regarding the method of consultation, and the unacceptable level of difficulty faced by anyone trying to read so many documents, is, in our opinion, *unreasonable*. An LDO is also *inappropriate*. We do not believe that it is acceptable to use an LDO for development on Green Belt land for a hyperscale data centre. It is the combination of these two aspects that creates the problem. The way the process has been applied has in fact led to the application being subject to less scrutiny. Residents have had a great deal of difficulty in communicating with the council – including their ward councillors - about the proposal, as the council's view was consistently, that information on the nature of the proposal would not be available until the Consultation stage. A group of concerned residents did have a number of meetings with the Local Planning Authority in order to try to understand the LDO process, because it is an unusual track for planning. Despite this, no discussion took place on the details of the proposal, again, because it was claimed that no details would be available until the LDO was ready for publication. The way the LDO process has been conducted has therefore been *unfair*. This demonstrates that the way this process has been handled is contrary to local government guidance: *'A fundamental component of delivering and developing an LDO is to ensure that there is effective engagement with all relevant stakeholders.'* (Guidance to councils on Preparing LDOs section 3.3). Local government guidance also says: 'It is imperative that LPAs are clear from the outset what the issue, or opportunity, is that they are seeking to address *in an area, or on a site*, through the use of an LDO' (our emphasis). As we argue below, the motivation for building a data centre has been entirely to satisfy national demand and not in any way to benefit the local area. This submission covers the following points: 1. The proposed EHDC is an *inappropriate development*. 1.1 Local Plan should be the start and should be revised first. 1.2. Alleged national shortage – smaller data centres not a case for hyperscale. 1.3 'Sustainability' doesn't work for data centres 1.4 Data centres and security 2. The threat to the Green Belt is excessive. *'Very Special Circumstances' have not been demonstrated*. 2.1 Land for food production should not be taken 2.2 Conservation area 2.3 Five purposes of green belt: + health, recreation etc – historic site (also: vague language in evaluating) 2.4 Openness (understated) 2.5 Urban sprawl and other developments in the wider area 2.6 Mental Well-being 2.7 'Critical National Infrastructure' and demand for data centres 2.8 Weighting of each of the five purposes 2.9 Need? 2.10 Section 106 3. There are problems with the way risk assessment has been calculated, which minimise the extent of the *costs to the local area, which are many and varied* 3.1 Problems with the way risk assessment has been calculated, 3.2 Risks and changing technology 3.3 Combined effects not measured 3.4 Untidy documents on risk! 3.5 Visual impact 3.6 Traffic 3.7 Noise and humming 3.8 CO2 and climate change 3.9 Resilience to climate change 3.10 Electricity demand,

		3.11 Hot air 3.12 Back-up generators 3.13 Water demand, 3.14 Flooding 3.15 Effects on the River Mardyke downplayed: misrepresentation of evidence on the River Mardyke condition 3.16 Batteries 3.17 Electronic waste 3.18 A Holistic View – the sum of 'small or moderate harms' = a 'substantial harm' 4. Any *benefits* arising from a hyperscale data centre do not accrue to the local community. 4.1 Havering vs North Ockendon 4.2 Jobs figures exaggerated 4.3 Multinational data companies 4.4 Business Rates 5. There would be *excessive damage to ecology* and the natural environment, 5.1 EHDC not an 'exceptional case – richness of wildlife on the site 5.2 Ecology 101 (!) 5.3 Many kinds of damage 5.4 Unsatisfactory 'trade-off' 5.5 Length of time means more damage 5.6 Damage to the River Mardyke 5.7 Downplaying of nature. 5.8 The Precautionary Principle. 5.9 Badgers 5.10 SINCs etc 5.11 Mitigation can do anything! 5.12 Who monitors? 6. The Ecology Park: not viable, not accessible. 6.1 Viability 6.2 Accessibility 7. Horticulture 7.1 Extraordinary claims 7.2 Providing heat and heat going where? 7.3 Water quantity and source 7.4 CO2 7.5 Other 'clutter'! ********** 1. The proposed EHDC is an *inappropriate development*, for the following reasons: 1.1 The proposals should have been based on the Local Plan, which, together with the London Plan, 'will be the main basis for decision making and managing development in the borough'. (Local Plan 14.0.22). The fact that the Local Plan has not been updated does not, in our view, mean that it no longer applies. The Local Plan contains several statements like the following, which are very positive towards gaining environmental benefits in planning: (Local Plan Section 5): Borough-wide strategy for growth. "5.1.11 Havering is one of London's greenest boroughs with extensive open spaces... The spatial strategy of the Local Plan is to optimise the use of brownfield land with suitable brownfield sites being developed first, meeting the demand for new homes and business growth and to provide continued protection for Havering's Green Belt and its most valuable open spaces and its ecological assets." In our view, it is not consistent with the Local Plan to choose to build a *hyperscale* data centre on Green Belt land. We are not opposed to data centres, but this is an over-ambitious and risky proposal that will cause harm to the local environment and to local residents. Had the scale of the project been less ambitious, it would have been easy, we believe, to find other (brown-field) locations. The case has not been made in the documentation for a data centre *of this size*.

		It is worth noting that the largest data centre in Canada is half the size (300 MW) of the proposed EHDC. One of the largest data centres in Europe is in Wales, and it is only 148MW. We note that the Local Plan badly needs updating (it was last drafted in 2021). However, this does not give the planners or the developer a justification for adding a new emphasis on data etc. The Local Plan should be updated by the council before embarking on such an enormous proposal. 1.2 Need? Various arguments are put forward to the effect that there is a national shortage of data centres. For example, Statement of Reasons (SoR) 12.3 says: 'It is widely accepted that there is a significant and urgent need for additional data centre capacity to ensure that the UK retains its competitive edge…' However we believe that (i) this statement is open to challenge (see the BBC news items cited below), and (ii) again, any national need could be met by constructing a number of smaller data centres. Throughout the documentation there is a presumption - that we do not accept - that the only solution to a national shortage is *this* hyperscale data centre in *this* location. We also believe (iii) that it is wrong for a Local Development Order to be put in place largely to meet an alleged need for 'national competitiveness'. We find it a very odd use of logic to say (SoR 16.15) that 'The absence of a plan-led solution carries moderate weight in favour of the proposal and engages the presumption in favour of sustainable development.' Absence of a plan does not logically lead to any particular new development. 1.3 Sustainability? We question the use of the word 'sustainable' here and in several other places in the paperwork. (For example, Section 3 Policy Context 3.4: 'locations which are or can be made sustainable', in reference to a location that will need new buses and car parks!!) A key point is that data centres (experts acknowledge) have a limited life, because of technical developments in computer chips and electronics. And we just do not know what changes AI will bring to the whole field. This is not 'sustainability'. Also, when the data centre is no longer usable, what will happen to the electronic waste? Surely there will be a huge potential pollution problem to be sorted out. This is not a sustainable proposal. 1.4 Data centres and security: https://www.tomshardware.com/tech-industry/drone-strikes-hit-three-aws-data-centers-in-the-uae-and-bahrain The Amazon Web Services (AWS) incidents in Bahrain and UAE during the war on Iran fundamentally changes the risk to data centres. It demonstrates that hyperscale data centres can and will be physically attacked in real conflicts. It shows that damage can be severe, prolonged, and disruptive. It confirms that cloud infrastructure is now part of modern warfare. It highlights that placing such infrastructure in or near residential communities introduces risks those communities did not previously face and did not ask for. This underlines the high risk strategy of planning a hyperscale data centre, and it is akin to putting all your eggs in one basket, and concentrating key national security assets in one place. Splitting such a monstrosity into numerous smaller units spread out across the country is technically feasible and would considerably lower the risk. 2. The threat to the Green Belt. 'Very Special Circumstances'. 2.1 Food Production. The planned data centre is to be sited on Green Belt land in North Ockendon, land which is still being used for agriculture (wheat, barley etc). We should not be destroying land which is still productive, especially as the weather has been wetter in recent years, and wheat production has been falling, leading to more imports (sustainweb.org). We do not believe that the proposed horticultural facility will be a sensible substitute. (See also below on Horticulture) 2.2 Conservation Area A large part of North Ockendon is a Conservation Area. Local residents have very strict restrictions on what they 2.2 can build on their properties – yet the council wants to build 'the biggest data centre in Europe' on the open land there! This seems unfair and unreasonable. 2.3 Green Belt. We note, as in Statement of Reasons 3.8, the five key purposes of the green belt, according to the NPPF. In addition, not mentioned in the documentation, there are acknowledged benefits for recreation, health, air quality, and biodiversity. We note that (S of R 12.3 and following) the site 'very strongly contributes' to two of the five key purposes: to check urban sprawl; to safeguard the countryside from encroachment. It makes a weaker contribution to preventing the merger of neighbouring towns, and assisting in urban regeneration. NB: we have strong reservations about the use of imprecise terms such as 'strong' and 'weak' (see 3.1 below). We disagree that it makes a weak contribution to preserving a historic setting: visitors' and residents' experience of North Ockendon comprises open fields – part of the Land of the Fanns – as well as historic buildings. North Ockendon is the only part of London that sits outside the M25 – it is quiet and very green. It is a historic village, and its character would be destroyed by a hyperscale data centre. 2.4 Openness. We would add that Green Belt land is supposed to be characterised by its 'openness', but the 12-15 buildings on the site will be very high (up to 21 metres) and each will be enclosed by 16-metre fencing. This is hardly 'open'! 2.5 Urbanisation. The Green Belt also exists to prevent 'urban sprawl'– and yet, in Havering there are a number of potential local developments that will increasingly encroach on the openness of the countryside: The Lower Thames Crossing, housing at Benets Road, and in West Horndon, Battery Storage in Cranham, and It is downwind from Launders Lane where there is a serious air pollution problem. Other planned developments include: 2100 houses at Horndon (Thurrock); followed by a further phase with yet more houses; 10,000 new homes at proposed Dunton Garden Village (Brentwood); and a Moto proposed service station on the M25 between Noak Hill and Brentwood.

		Altogether, these developments, together with a hyperscale data centre, could be seen as urban sprawl (the document mentions 'urbanisation'), which the green belt is supposed to prevent. Moreover, building a data centre here would set a precedent, so that yet more development would follow. 2.6 Well-being. We also maintain that damaging the natural environment harms the mental well-being of local people, and the Green Belt is needed to keep us sane! 2.7 Critical National Infrastructure. The 'Very Special Circumstances' set out in the SoR put excessive weight on the national need for data processing, partly by using the argument that data centres are 'critical national infrastructure.' However, we believe that this statement is being misinterpreted. To quote the LDO document 3: Need and Alternatives: 3.10 (and similarly in Statement of Reasons 1.4): The definition 'critical national infrastructure' means that 'data housed and processed in UK data centres, such as NHS patient records and sensitive financial investment information, is less likely to be compromised during outages, cyber-attacks and adverse weather events. Putting data centres on an equal footing as water, energy and emergency services systems will mean the data centre sector can now expect greater government support in anticipating and recovering from incidents, giving the industry greater reassurance when setting up business in the UK and helping generate economic growth for all'. This does not, in itself, make a case for building a data centre (except indirectly, as contributing to 'economic growth'). And it does not provide a justification for building one on Green Belt Land. While data centres may be of 'national' value, that doesn't mean they can be allowed to harm 'local' areas! Finally, it is arguable that there is not a shortage, but an oversupply of data centres: according to The Register: 'About 140 datacenters are in the queue to be connected to Britain's power grid, and their combined energy requirements are estimated to be more than the current peak electricity use for the entire country.' (See further below concerning power demand). https://www.theregister.com/2026/02/27/datacenter_uk_grid_demand/?shem=dsdf,sharefoc,agadiscoversdl,,sh/x/discover/m1/4 And from the BBC: 'The number of data centres in the UK is set to increase by almost a fifth, according to figures shared with BBC News... there are currently an estimated 477 of them in the UK... However, there are concerns about the huge amount of energy and water the new data centres will consume. Some experts have warned it could drive up prices paid by consumers. https://www.bbc.co.uk/news/articles/clyr9nx0jrzo 2.8 Balance? We do not accept the conclusions drawn in SoR 13 Green Belt Balance for two reasons: (i) two of the factors adjudged to bring a 'substantial positive' impact are: the 'need' for data centres (which we dispute above), and the economic benefits (which we also dispute, pertaining as they do to the national economy not the local one). The other two 'substantial positive' factors are the eco park and biodiversity net gain. If the two 'positive' factors based on need for data centres, and economic growth, were omitted as we believe they should be, then the balance would be towards the negative factors, that is: harm to the green belt. To reiterate: a contribution to economic growth could be achieved by building a number of smaller data centres – there is no justification for a hyperscale data centre in this location. (ii) the use of imprecise terms such as substantial, significant, limited and moderate. This links into a serious methodological issue, which we take up below (3.1). 2.9 Needs and alternatives, and mitigation On the choice of this site: the section 'Needs and Alternatives', in the Main Environmental Statement, makes the point (3.91) that this site is the 'preferred option' for a number of reasons – these are mainly to do with the technical needs of data centres, but it also says the plan: 'Proactively integrates mitigation measures to avoid and/or minimise significant adverse environmental effects.' We believe that the large number of 'mitigation measures' that are described in the LDO documentation indicates substantial damage to the natural environment (see below). 2.10 Section 106. What is more, the pages (448-462) which describe 'Section 106' Green Belt Mitigation payments (totalling £9 million) have nothing of benefit to North Ockendon apart from some changes to traffic and travel in the area – which the developer would have to carry out anyway for their lorries etc to be able to get to the site! Unfair again. 3. Problems with risk assessment and other costs to the local area: 3.1 We are not convinced by the methodology used in the documents to identify and assess levels of harm, risk, etc. There are too many judgments made using broad labels like 'negligible, minor, moderate, major' without any quantification or other means which would help an impartial reader to understand these judgments. There is a Defra Risk Assessment Methodology (Green Leaves III) which could have been used. In addition, the statement 'professional judgement will be used' occurs many times. This is an empty phrase, as of course everyone involved will be 'professional'; but how do outside observers assess the accuracy or reliability of the judgement? 3.2 Technology changes! There is an added complication in terms of assessing harm or damage when dealing with 'new' technology. This can be seen with the following statement: (Chapter 4: Proposed Development and Construction: 4.18) 'Data centre buildings would be designed to be flexible and adaptable to accommodate evolving data centre technologies and innovative cooling and backup power strategies.' If everything changes, what then happens about measuring risk of harm etc? 3.3 'Combined effects' It is very disturbing to note (ES 5.77) that 'There is no established EIA methodology for assessing and quantifying the intra-project cumulative effects of individual effects on receptors' – in other words, the *combined effects* on local residents of dust, noise, vibrations, smells, noxious fumes, light pollution, and unusually high levels of traffic cannot be quantified. This is unacceptable, especially given the length of time (nearly 20 years?) it will take to complete the construction. 3.4 Untidy documents on risk assessment!

		There are loose threads within the network of chapters and appendices in which references for further detail on risk management are made to different documents that, on inspection, do not contain the relevant information (e.g., ES Chapter 12 Section 12.46: Reference is made to summaries in ES Chapter 4 of on-site management controls for sediment loading, but this information is absent). 3.5 Visual impact: the plan is for fifteen warehouse-sized buildings up to 21 metres tall, surrounded by 6-metre-tall security fences. There will also be generators, cables etc. There will be extra equipment on the roofs of the buildings. It is said that bunds (earth mounds, covered in grass) will be used for screening, but bunds are unsightly, and there is no way they would hide 21-metre-tall buildings! The bunds will also be planted with whips (young trees), which will take many years to be effective as any kind of visual barrier. *NB*. There is no mention of the view from Top Meadow Golf Club, on the other side of Fenn Lane. At present, the view is of an open panorama of green fields. This will be replaced by over a dozen warehouse-size buildings, spreading for a mile down the other side of Fen Lane. The data centre buildings will be surrounded by 'clutter': (ES:) 'External plant would include generators, heating and cooling plant, rainwater harvesting and photo voltaic (PV) renewable energy systems together with other related support tanks, plant and electrical equipment. Plant would generally be located on or under gantry support systems both on the roof and/or external to the building.' The many clients of the golf club, restaurant and hotel will have their view destroyed. The golf club could well lose substantial custom. Views across the landscape are an essential part of the natural environment in North Ockendon. For more information on the wider fen landscape, see the report that Thames Chase drew up in the 'Land of the Fanns' project: https://www.landofthefanns.org/ This is a rich, varied landscape, that has its own character – fens are rare and should be preserved. Extract from Thames Chase Trust report: 'Shaped by the last Ice Age and historically an area of fens, forests and farming, our landscape hosts an unusual variety of niche landscapes including highland, lowland, marshes and river valleys. Each of the… Landscape Character Areas identified… has attracted its own history, collectively making up a surprising landscape of diverse heritage with sites of national importance often overlapping with the national story… ' 3.6 Traffic: local roads are narrow, and traffic already has difficulty when a large vehicle is involved. We note that Fen Lane will be widened, but this suggests the removal of hedges and possibly trees, to the detriment of biodiversity. The data centre would add unacceptable numbers of cars, let alone HGVs, destroying the character of the village. The number of vehicles projected is high compared to current usage, especially of Fen Lane. Draft LDO: p 39: 'Vehicles on Fen Lane associated with the construction and operation of development (sic)… must not exceed 1,250 two-way vehicle movements … per day'. And: ES 8 Transport and Accessibility, diagram p7: 120 two-way HGV per day for ten years 2035- 2044, which is an unacceptably high load of HGVs. The inaccessibility of the site for public transport users is shown by: ES Page 12, 3.1 - 79.5% of data centre workers & 87.6% of visitors expected to arrive by car. The same can be seen from ES page 15: Estimate of trips: walk + cycle: 11, bus: 20, train: 21, LU: 11, car: 431… Page 34: 8.190 Based on the estimated trip generation, the completed development stage (2043!) is predicted to generate a peak of up to approximately 1,035 two-way vehicle movements per day (517 vehicle arrivals and 517 vehicle departures), of which there would be approximately 40 two-way HGV movements (20 HGV arrivals and 20 HGV departures). Statements such as this indicate how pedestrians will be 'expendable': Page 47: 8.297 'The completed development stage is predicted to increase traffic flows, particularly on Fen Lane. However, the proposed development would provide walking/cycling routes through the proposed ecology park, including a dedicated route between Ockendon Road to the main site entrance, allowing most non-motorised users to avoid use of Fen Lane.' 3.7 Data centres produce noise: a constant 24-hour hum, which has been known to cause stress and damage to health in the US. Noise regulations are probably not sufficient to deal with this as they only refer to decibel levels (we believe), and to 'vibration', not 'humming'. We do not think the LDO statements should be relied on here. 3.8 Global Warming. Data centres contribute to global warming by producing CO2. In fact, globally, they already produce more CO2 than aircraft do: on a world level, 0.5% of all carbon emissions are from data centres, and it is anticipated that the number of data centres will increase significantly (possibly by a factor of 3) in the next 10 years, so this problem will only get worse. Digital Reef claims that there will be 'zero carbon' emissions. We do not believe this is possible. From the BBC: Last month, MPs launched a new inquiry into the environmental impacts of data centres in the UK after Energy Secretary Ed Miliband said the impact of the rapid expansion of data centres on the UK's efforts to lower carbon emissions to net zero was "inherently uncertain". https://www.bbc.co.uk/news/articles/cj0ddmqpp8qo From the BBC: 'City Hall is to set a new stance on new data centres in London, due to concerns about their vast power and water usage, officials have confirmed. https://www.bbc.co.uk/news/articles/cj0ddmqpp8qo It is estimated that every 10 power-hungry data centres could result in 2.7million tonnes of carbon emissions, with further concerns about their substantial water usage. In the UK, 60 out of 100 such units – which house IT infrastructure such as servers – are currently planned for London.' Intensive construction work over 10 years will undoubtedly produce carbon emissions (not to mention the pollution from lorries, diggers, etc.). The materials used in construction will have created carbon emissions when they were manufactured. This is what is known as 'embodied carbon.' Generating electricity also creates carbon emissions indirectly, from the grid - unless it is 100% 'green' (from solar or wind power). The UK does not have a fully green electricity supply. The Main Environmental Statement acknowledges that it may not be possible to avoid carbon emissions: *4.35 Where it is clearly demonstrated that it is not possible to achieve the zero-carbon target on-site, any shortfall would be provided through* a cash in lieu contribution to the borough's carbon offset fund to be secured through a planning obligation. This is not good enough: how will measurements be made to ensure that as much as possible has been done to reduce carbon emissions? There is a danger that the operator will simply decide to pay the offset contribution and not bother about carbon emissions. 3.9 Resilience to climate change.

		Not only will data centres' emissions exacerbate climate change, but climate change, in the form of hotter weather, has already caused problems for data centres: in 2022, the summer heatwave took Google and Oracle's London data offices offline for several hours. We are seeing more flooding because of climate change. Flooding in the winter of 2015-16 took out Vodafone's main data centre in Leeds. Flooding is also a hazard at the site of the EHDC. 3.10 Electricity. A data centre can consume as much electricity as 50,000 homes. It is unlikely that the proposed data centre will get all its electricity from a renewable source, given the massive amount it will use. It is not clear whether the grid can support this demand. Recently, we have been informed of proposals to construct two electricity substations in the area. We were originally told that the data centre had to be near the Warley substation as it was the only one in the area that could provide enough energy! This indicates, at the very least, poor planning. Increasingly, nationwide and globally, there is conflict between supplying data centres with electricity and supplying homes. South Africa has experienced blackouts because the grid could not cope! The IEA estimates that Ireland uses one-third of its entire electricity production for data centres. The current boom in building data centres will multiply the danger of shortages considerably, and the more electricity that is needed in future, the less likely it is that green power will be used. In December, the London Assembly Planning and Regeneration Committee demanded a standalone policy for data centres in the next London Plan, suggesting several housing projects in west London had been stalled because of data centres using all available electrical grid capacity. https://www.bbc.co.uk/news/articles/cj0ddmqpp8qo 3.11 Air conditioning is essential in these centres as they produce a lot of heat. It would be useful if the excess heat were used to heat nearby homes, but we don't see how this could be arranged. As far as can be seen from the plans, some of the heat will help to grow crops such as aubergines and tomatoes! (See notes below on the Horticulture Centre, but the rest will go as far as the edge of the road, and a use for it has yet to be found! 3.12 Back-up generators. Hydrotreated Vegetable Oil (HVO) generators will be needed in case the electricity supply breaks down, and burning this oil will still be polluting. The 286 back-up generators will need to be run from time to time to make sure they are still working. This will create noise pollution as well. ES Appendix 10, 4.22: 'The standard operation of generators would be limited to testing and maintenance only, as total black-out grid outage is very unlikely. Generators would be tested weekly for a duration of 15 minutes, monthly for a duration of one hour and yearly for a duration of four hours during normal day-time operational hours.' Given that there will be 286 generators, we calculate that testing and maintenance would add up to some thousands of hours per year, and create several tonnes of Nitrogen oxide! The generators would be single or double stacked either at ground level immediately adjacent to the building they relate to, or on gantries. There is a lot of such 'clutter' throughout the site, which is not mentioned in the general descriptions of the buildings. 3.13 Water. Most data centres use vast quantities of water for cooling. It is unclear exactly how much water the data centre will use, as there are references to rainwater collection and reservoirs. but it is likely to be around 5 million gallons per day (100 million litres a year). This is enough water to supply tens of thousands of houses. There are already complaints in this country, and across the world, that data centres are causing water shortages. It is unclear where this data centre will acquire potable water. Local residents already complain of not having an adequate supply! How will the demand for water, and the necessary output of water once it has been used for cooling, impact on the river Mardyke, and the fen country (one of the few such areas in London), which is nearby? Recently, we have been told the cooling will be done chemically, and this raises safety and pollution issues. 3.14 Flooding. The whole area is low-lying, and much of it is subject to flooding. With the building of a large number of large warehouse-type structures, the ground will lose its ability to absorb rainwater (and we will be getting more rain in future because of global warming!), leading to run-off and flooding problems. The very low-lying land (fen) to the south of the area (where the main part of the 'ecology park' will be) is ecologically rare and valuable, and would be affected by changes in the usual flow of water from the landscape. 3.15 Effects on the River Mardyke downplayed: misrepresentation of evidence on the River Mardyke condition: There is misrepresentation of the evidence underpinning the claim that the Mardyke river will meet its target condition of moderate without the need for any direct works. The LDO states that taking it out of arable production will naturally improve the condition of the river. This contradicts the recommendations made in the actual river assessment (Appendix 24 "Biodiversity Net Gain Assessment – Appendix C: River Assessment", section 4.1) that further river assessment of a "post-development scenario" would be required in order to determine whether there would be improvement to the watercourse's condition. This gives the impression that the river will be improved as a byproduct of the development without having carried out the necessary subsequent assessments. 3.16 Batteries At one stage, it was said that there would be 50,000 square meters of batteries. This suggestion may have been superceded… It is difficult to keep up with changes like this (cf the plans for cooling). Again, part of our objection is that this proposal is not simply complex, but is in flux all the time. In case there will be stores of batteries: we have seen explosions and fires at similar sites (e.g. near Heathrow) – there must be a danger of fire in a data centre that stores batteries. If there is a fire, any water used to extinguish it will be toxic because of the metals used in batteries. Since batteries and computers use rare metals, what implications are there for the mining of rare metals, lead etc, which is done by poor labourers in developing countries? 3.17 Electronic waste. It is also likely that the centre will only have a lifetime of 10-15 years Thereafter, a large quantity of electronic waste will have to be dealt with, and this is already proving problematic around the world. 3.18 NB: A wholistic view must be taken, not a fragmented one. It may well be argued by the developers that all or most of these harms are in fact not very serious. Our contention is that when added together there is a serious level of harm.

		4. Benefits? 4.1 Havering vs. North Ockendon Whenever the Council leadership has described the benefits of the data centre (and the leadership is strongly in favour of it), they have put these in such a way that they would go to Havering, and not the local community. The leader has spoken of 'The reputation of Havering', and that this would be 'a catalyst for other businesses.' These 'other businesses' (and jobs – see point 12) would clearly not be in North Ockendon, which is a historic village. How, then, is this a 'Local Development'? 4.2 Jobs. The council's claim that the proposed centre would create 2,800 jobs is misleading, as most of these will be construction workers during the 17-20 year (!) construction period. When the centre is operational, only a small number of staff (approximately 100, divided between management, security and operational) will be required, and we question how many of these jobs will be suitable for local people. 4.3 The benefits will be primarily to huge, wealthy companies (Amazon, Google et al) that handle large amounts of data. The promise of jobs is not likely to benefit local people, and we understand that most data centres outlive their usefulness in 9/10 years. Once the land has been built on, will it still count as green belt, or will it be built on? 4.4 Substantial business rates have been cited (especially by councillors) as a benefit, given that Havering is short of money, and we suspect that this is the primary motivation of the council leadership. However, the developers are not able to use this (financial gain) as an argument in the planning application. 5. Damage to ecology and the natural environment – and the 'ecology park' 5.1 We do not accept that the proposed Data Centre is an 'exceptional' case such as to justify the damage to the natural environment. The site is currently very open green space, and it is extensive, with crops, established hedges and old trees. There is a SINC (site of interest for nature conservation) on the site, several SINCs nearby, and it is next to a conservation area. This is the wrong site for such a development. Constructing such a large number of buildings is 'urbanisation' as admitted elsewhere in the documents. 5.2. Ecology 101. The documentation shows a complete lack of understanding of ecology and the workings of ecosystems. Ecosystems are built up over sometimes hundreds of years, and cannot be replaced in a matter of weeks. They are complex, and include living organisms from bacteria, through insects, to mammals, reptiles and birds; they need the right soil, plants, grasses, hedges and trees to thrive. The more variety in an ecosystem, the more resilient it is – remove one element and you make the system more prone to collapse. 5.3 Damage from noise, dust etc. The developers say they would not remove the established hedges, but the dust, noise, vibrations and light from building work taking place next to them, would clearly drive wildlife away. Extensive building works going on for at least 8-10 years, and not completely finished for some years after that, will disrupt wildlife, and once driven away, it is unlikely to return. Moreover, in order to widen Fen Lane, for lorries to get down it, hedges *will* be removed. How does this fit with the green claims of this proposal? It is said that whips will be planted in the 'eco-park', and as 'screening' round the buildings, but these, of course, will take many years to grow into mature trees – so they do not even work as screens! Woodland takes 15+ years to reach a 'moderate' ecological condition. Meadows take 5-10 years. Some habitats will never reach their previous condition when placed somewhere else. The loss of biodiversity will be immediate, and recovery will take many years, if at all. That is, newly created habitats are artificial and managed, and they lack the complexity and richness of undisturbed and long-established ecosystems. 5.4 Unsatisfactory trade-off. To remove a vast expense of open land, ('the total volume of excavated material arising from the proposed earthworks is estimated to be 642,504 m3, assuming a worst-case, maximum dig level of 600 mm below finished floor levels' (Main Environmental Statement 4.196) and 'replace' it elsewhere (in mounds or in the eco-park) represents a trade-off which is not based on science: open countryside is replace with a managed eco-park; the rural character of the landscape is replaced with a designed landscape, and above all undeveloped land is replaced with an industrial site plus some newly-planted greenery. The developers are making a value judgement, which works in favour of the data centre etc. It is not a scientific judgement, despite all the lists and measurements in the documentation. The claim of 100% net biodiversity gain, which Digital Reef maintains, is therefore unreal because unquantifiable. 5.5 Phasing, and length of time for the development: more damage. It is noted also that 'The earthworks would be carried out in three phases in tandem with the build out of build zones' so the moving of soil (mainly to create 'mounds') will go on over a number of years. This is very disruptive of the ecology. Different layers of soil will be sorted out, so as to retain seeds – but it is not clear how this will be done. Again, it would have been better to leave the seeds where they are! 5.6 Damage to the natural river environment It is very likely that the sustained risks imposed by the 17-year construction phase, will degrade the condition of the river over the medium to long-term. The risks of sediment loading to the river, of which the detail on mitigation is severely lacking, will surely exceed the current arable risk, due to the large-scale excavation works required for this 400,000 sq-m development. This will have a negative impact on the water quality and morphology of the Mardyke and subsequently its associated habitats and species of fish and invertebrates. 5.7 Downplaying of value of nature. There is a variety of flora and fauna in the area. We note that surveys have shown the presence of rich variety of wildlife, which corresponds *to some extent* with information we have collected from GiGL. We note that for birds, for example, whereas GiGL has 15 species on the Red List, the EHDC surveys record 10… However, we believe that the importance and value of this wildlife has been downplayed, and methods of assessment have been unscientific.

		For example, (again just taking birds, as it has proved impossible to go through every species!) despite recording on p 17: Nine Wildlife and Countryside Act (1981) Schedule 1 species were recorded on the site, and ten BoCC Red List species, on p 19, the table says: 'The site and study area supports a bird assemblage typical of farmland in south-east England, with rarer species present. Therefore, the site is assessed as being of Local ecological importance for bird assemblage.' Does this mean that because the site has mainly common birds, the rarer species are dismissed? 5.8 The Precautionary Principle, caution and objectivity. It is important in matters of environmental protection to apply the Precautionary Principle. Extra care should be taken where there is any uncertainty. The opposite has been done here, especially by stressing 'mitigation' after the damage has been done. In addition, there is no way for an impartial observer to judge whether or not 'sufficient survey effort was applied'. (See also our point 3.1 about such judgements). We therefore challenge statements such as the following: (App 10, *11.90) 'An ecological assessment provides only a 'snapshot' of the conditions prevailing at the time of survey. Therefore, lack of evidence of a particular species does not necessarily preclude them from being present on-site at a later date. However, it is considered that sufficient survey effort was applied to the site, so that it is unlikely that evidence of activity by protected or notable species has been overlooked.'* Who judges what is sufficient? 5.9 Badgers In our experience, sadly, the consultants and contractors working for Digital Reef are not to be relied on when it comes to awareness or safeguarding of badgers. There was an episode we experienced, when contractors started work on the site (without any kind of permission) and placed their equipment (a hut for equipment in fact) within the legal limit next to badger setts. We were told that despite a survey having been done, SLR were not aware of the presence of badgers! (We can document this, including police reports). So we are more than sceptical of this kind of statement: (App 10 *11.93) 'During the 2024 badger survey a field (location not disclosed due to confidentiality) was not accessible. However, the only suitable sett building habitat in this field area was limited to two small areas of scrub. As such, this lack of access was not considered a significant limitation, with sufficient data captured to assess likely presence of badger setts and to advise on appropriate actions. Given the site context and the types of habitats present, the level of survey was considered sufficient to meet the objectives of the survey.'* 5.10 SINCs and statutory sites We note that skylarks have been found at Fairplay Farm SINC, but the works planned for here will go ahead anyway: (11.188) 'Direct effects on Fairplay Farm SINC (Borough ecological importance) would comprise the permanent loss of approximately 40.9 ha of habitat (49.8 % of the SINC), with 14.9 ha of this build zone (18.1 % of the SINC).' We do not accept the following as viable: 'The remaining 26 ha (31.7% of the SINC) would be reinstated as ecology park habitat.' We also believe that placing boxes for skylarks elsewhere is in fact causing harm to the SINC that is not acceptable. '11.193 Effects on arable species using the SINC's habitats would be expected, including loss of habitat for skylark, which favour open arable farmland for nesting.' But there won't be any open arable farmland left! Two Statutory sites are noted: 11.105 'The desk study data search identified two statutory designated sites within a 2 km search radius of the site boundary. These are Cranham Marsh LNR which supports a range of habitats including unimproved grassland, wet woodland, reed and sedge beds and Cranham Brickfields LNR which includes habitats for woodland, ponds, wildflower meadows, and a grassed area.' But it is not clear what the effects will be here. It is crucial to work out the effects on the wider landscape, and we do not believe this has been done adequately. 5.11 Mitigation There are too many examples of the belief that 'mitigation' is so good we can do anything! See also: 11.291 'The minimum numbers of features including bat, and bird boxes, hibernaculum and skylark plots which would be delivered, and their trigger for creation within development stages, are set out in Table 11.10. The mitigation addresses the effects of the proposed development as a whole. The specific mitigation has been apportioned to each element and Phase of the proposed development to ensure deliverability and for the purposes of enforceability. Due to this the mitigation would not necessarily be located in direct proximity to the potential harm however, the site as a whole would be fully mitigated on a phase by phase basis. These measures have been informed by existing baseline conditions and using professional judgement. The exact location and distribution of the mitigation would be advised by an experienced ecologist prior to commencement of works of each development stage.' And: 11.343 Additional mitigation has been proposed based on legislative requirements, best practice and with the aim of delivering biodiversity gain. These measures would reduce and off-set identified adverse effects. Finally, one more example¸ concerning 'habitats', of the vague, unscientific evaluation, that runs through this whole document: … the proposed development would maintain the ecological importance and integrity of the majority of more important habitats and minimise adverse effects…. à the construction stage would result in temporary Significant Adverse effects at up to the Local scale as a result of loss of habitats, until such a time as replacement habitats become established (when the adverse effects become 'minor'…). 5.12 Monitoring and Management. *These extracts also raise another important question: there are many references in the documents to 'monitoring' or things being 'overseen by an experienced ecologist.* For example: 11.167 Prior to the construction of each phase, land would continue to be managed for agricultural use. An ecologist would be consulted for advice on appropriate management of land should agricultural practises cease to be undertaken.

		11.168 An Ecological Clerk of Works (ECoW) would oversee construction works on the site and best practice environmental measures affecting biodiversity would be implemented: [they would need a] GCN licence. The Draft Landscape and Ecological Management and Monitoring Plan is incredibly detailed and thorough, but *the key question is who will carry out these tasks, who will pay them, and who will check that the work has been done satisfactorily?* 6. The 'ecology park' 6.1 Our first objection concerns the viability of the 'ecology park' as a public attraction. We do not believe people will want to come all the way to the site when it is primarily filled with huge buildings and their associated equipment. This applies particularly to the land around the perimeter of the buildings, which is where the opening to the park is located. Is it really likely that people will want to take a stroll around 21-metre-high buildings?! 6.2 Accessibility The ES Chapter 8 points out (8.281): 'The site currently has poor pedestrian and cycling accessibility. There is generally low propensity for walking to the site, given that the closest populated residential areas are located approximately 3.25 km (2 miles) to the south in South Ockendon and approximately 4 km (2.5 miles) to the east in Bulphan, which is considered beyond a reasonable walking distance for most people. This is compounded by the general lack of segregated footways and cycleways, including no continuous footway, cycleway, nor suitable Public Right of Ways connecting the site to these nearby residential areas, forcing users to share the road with vehicular traffic, which reduces pedestrian/cyclist safety and amenity.' Also: (8.282) 'The site has a Public Transport Accessibility Level (PTAL) score of 0, representing the lowest possible PTAL score. The village of North Ockendon has a PTAL score of 1a to 1b. Therefore, the site is in an area of very poor public transport accessibility.' The other result of this poor accessibility – along with making it less likely that there will be many visitors - is that any visitors will have to travel by car, which would cause harm to the environment. We strongly believe that the creation of an ecology park would damage the existing ecology, and this cannot be compensated for by re-planting etc.. 7. Horticultural Buildings. 7.1 Extraordinary claims regarding horticultural production have been made by the developers, along the lines that the facility could help solve the country's food problems! In reality, it can be seen that the proposals are over-complex, and simply wrong-headed: growing crops that need heat is the wrong way to tackle our food problems in the long term. We are already able to produce 'new' crops such as grapes because of climate change, for example. To say, as documents have, that aubergines will be produced is simplistic. 7.2 Providing heat. When we look at the details, we find all sorts of equipment that will need power and maintenance: for example (ES App 10, chapter 4): 'horticultural buildings would be provided with waste heat from the data centres through an underground pipe network. A heat pump in the proposed district heating centre would lift the temperature of waste heat to the required temperature (between 34 and 54 °C)'. So, the heat from the data centres will only provide some of the heat for the greenhouses. 7.3 'Water for use in the greenhouses would be drawn from a proposed 31,250 m3 reservoir. It would comprise a maximum 2 m high graded bund… and excavation to a maximum of 2 m below existing ground level. The water held in the reservoir would be pumped to a treatment plant where it would be mechanically filtered to remove large particles and sediment, and chemically treated to remove microbes, bacteria and viruses before being used. The reservoir would be fed by rainwater harvested from the roofs of the horticultural buildings.' So, a reservoir, and a treatment plant, with chemicals to purify the water. Source of the water? '4.42 The required capacity of tank(s) for on-site water storage for irrigation use, located adjacent to the greenhouses, would be 600 m3… Available rainwater would be prioritised for use as the primary water source. There would also be a potable water connection for topping up the supply when required.' So, tanks on-site, but also drawing water from the local supply, which is already at a low level, residents tell us. 7.4.(4.43:) 'CO2 enrichment through the supply of pure (liquid) CO2 within the greenhouses would be used to increase the yield of horticultural crops. A 60-tonne tank of liquid CO2 would be stored on-site with a maximum of two deliveries a week to the site during March to September. More complex equipment! And tankers of CO2 delivered twice a week. 7.5 Other 'clutter'! A 2,000 m3 hot water tank and reverse osmosis machine would also be required on-site. And a hot water tank. But 'all external plant would be within an appropriately screened compound.' 'The facility would require a small service yard for the delivery and dispatch of goods together with the provision of employee car and cycle parking bays including blue badge spaces, electrical vehicle spaces and two spaces for coaches transporting horticultural workers.' (4.46) 'A small generator would provide back-up power if required.' More 'clutter'! END **The proposed East Havering Data Centre – a threat to local biodiversity.** The **London Plan** (217) states that: to meet Policy 7.19, developers must "*wherever possible, make a* ***positive contribution to the protection, enhancement, creation and management of biodiversity*****".** Note that the word 'protection' comes first in this quote. We would argue, first, that the site has a significant variety of wildlife, including many species that are precisely ***in need of protection,*** either because of their rarity, or the fact that they are in decline. Second, we are convinced that constructing an 'ecology park', right alongside the data centre buildings, is not an adequate replacement for wildlife that will be damaged or driven away as a result of the massive amount of construction involved in building the data centre. It will take up to ten years to build. There will be 12-15 warehouse-style buildings, each 21 metres tall, plus up to 5 metres for 'flues' - covering an area of 472 acres (191 hectares). Figures from SLR screening & scoping report July 2023.

		The point is that construction work on a site this size will involve: laying concrete foundations to provide nearly 400,000 square metres of floorspace, then constructing the buildings to hold the masses of computers, batteries, and back-up machinery, using a huge number of lorries travelling to and from the site, creating noise, dust and pollution for up to 10 years**. This can only be highly destructive of existing wildlife.** **The whole site is Green Belt land.** It is not the case that the land to be built on is bare or poor. Crops have been and still are growing, and there are **many species of plants, insects and animals on or near the site**. (See further below). There is, therefore, an established ecosystem. A basic point about ecology (not understood by most developers!) is that **ecosystems grow gradually over many, many years, and there is a continual, vital interaction between all the organisms in the ecosystem**. To destroy one part of an ecosystem risks destroying the whole of it. **We have used information provided by GiGL (Greenspace in Greater London) to make our case concerning biodiversity.** GiGL gives very detailed information on all forms of wildlife, and is used by researchers and wildlife organisations to keep up-to-date and detailed records of wildlife in London. When consulted about a planning issue, like this one, GiGL draws up a **map of the affected land, up to 2km from the centre of the site, and records all the wildlife found in that area**. This process recognises that the effects of construction work go beyond the boundaries of the site itself. The species of plant, insect, invertebrate, moth, butterfly, and mammals that have been seen on the site are noted, along with a designation indicating how **rare or significant** they are. The different **habitats** are also described, and in this area, there are: sites of Metropolitan or Borough Importance, Sites of Local Importance, and one Invertebrate Importance Area (IIA). There is **a Local Nature Reserve at Cranham Marsh, and there are 12 Sites of Interest for Nature Conservation (SINCs) within the 2km area. (See below).** **Protected species and species of conservation concern, from the following categories, have been found on or near the site:** • Internationally or nationally protected species • London Priority Species • Red Data List species • Species of Conservation Concern in London **SUMMARY** of species identified in the area, **all of which come under at least one of the above categories:** **Plants:** 12 flowering plants NB there is a separate GiGL listing of **some 200 plants classified as axiophytes** (Greek for 'worthy plant'). These are plant species which are indicators of habitats of interest for nature conservation. They are not necessarily rare, but may be very common in habitats of high value. The greater the number of axiophytes present, the greater the botanical value of a site. **Invertebrates:** 4 species (including bugs, beetles and dragonflies). **Butterflies and moths:** 9 species of butterflies, and 10 of moths, all of London or Local Significance **Mammals:** The following are all either endangered, vulnerable or at risk: water vole, hedgehog, harvest mouse, hazel dormouse, 5 species of bat. **Birds:** The area is **very rich in birdlife**. Around 60 different species of birds are listed, and all are significant (note that some species appear in more than one category, so the total below is greater than 60): 45 are on the Red Data List, 29 on the list of London Species of Conservation Concern, and 27 London Priority Species, 19 covered by International Legislation, viz. the Birds Directive Annexe 23 covered by the Wildlife and Countryside Act 19 counted as Nationally Rare. **SITES OF INTEREST FOR NATURE CONSERVATION (SINCs)**, a summary: **Cranham Marsh:** Marshland is **rare** in London, and this is a fine combination of wet ancient woodland, wet meadow and marsh and an **important habitat for marsh-dwelling species**. There are several regional and locally uncommon plants. The invertebrate fauna includes the **nationally scarce bee Macropis europaea**. The site is also important for **specially protected reptiles and the great crested newt.** Cranham Marsh also includes a Local Nature Reserve. **North Ockendon Pit:** this was designated a Site of (Havering) Borough Importance Grade II in 2003. It is 'moderately rich in plant species.' It has an **invertebrate assemblage of national importance, including several rare bees, wasps and ants**, and is part of a 'chain' of similar sites in the wider area. It has **significant populations of reptiles, and it is a valuable undisturbed breeding ground for a wide variety of birds -including lapwing (red-listed) and reed bunting (amber-listed)** - in an area dominated by arable farming. **Fields South of Cranham Marsh:** these are **f**ields with hedges and drains, where the hedges have **diverse species.** Wet areas may contain **voles**. Rotting wood is likely to have invertebrates, and when leguminous crops are planted in these fields, bean broomrape (Orobanche crenata) appears in large numbers. **This is the only place in the UK where this unusual alien plant is naturalised.**

		Fairplay Farm: a farm with fine old hedges around, supporting traditional farmland birds and mammals, around fields with **rare arable weeds**. A series of arable fields and hedges with a good variety of associated wildlife. The fields contain large amounts of loose silky-bent (Apera spica-venti), a **nationally scarce grass**. Arable fauna is also well represented and includes **skylark**, a strong population of **brown hare and harvest mouse, the latter rare in London**. A variety of common butterflies are present. There is an unusually large number of ancient oak (Quercus robur) pollards that include fissures and dead limbs, and therefore **likely to be of value for bats, fungi, hole nesting birds and invertebrates.** **Clay Tye Wood:** this is the **only rookery known to remain in Greater London** and the largest in Thames-side Essex. A sizeable wood, probably ancient, with **London's only known nesting colony of rooks, with around 80 nests.** **Cranham Hall (Shaws and Pasture):** an area of traditional countryside with pasture, rich hedges, a pond and two small woods. **Ancient woodland**. A mosaic of habitats which are of value to a variety of birds and invertebrates, and possibly amphibians, as well as having botanical interest. **Puddle Dock Angling Centre:** a variety of wetland habitats, with a population of the **rare water vole.** The grounds of this angling centre contain a good variety of wildlife habitats. The open water has an abundance of young fish, which attracts **herons and kingfishers**. Some of the ditches are used by water voles. The main drainage feature running south from Warley Street is heavily shaded by blackthorn (Prunus spinosa) scrub that is likely to be of value for nesting birds. A line of very old oaks with blackthorn is of potential interest for invertebrates and **bats.** Warley Street drain runs north from the angling centre and there are broad margins of coarse grassland with areas of scrub and tall herbs. This area may support water **voles.** **Thames Chase Community Forest Centre: t**he site includes several **ancient hedges**, some with old hollow pollards and one containing a wild service-tree (Sorbus torminalis). Boundaries also comprise streams with treelines of oak (Quercus robur) and various willows (Salix spp.), also areas dominated by great reedmace (Typha latifolia) and reed canary-grass (Phalaris arundiacea), and with quite diverse wet tall herb. **Water voles are present**. There are two recently-created ponds. The second has well-developed aquatic and emergent vegetation including a good stand of lesser reedmace (Typha angustifolia). A water crowfoot, possibly Ranunculus trichophyllus, is also well established. **Upminster Sewage Works grass beds**: an interesting mix of wetland habitats, home to birds and the **rare water vole**. The site forms a significant wetland area in the north of the borough **of value to birds, water vole, amphibians and invertebrates.** **Hall Farm Moat, St Mary Magdelene Churchyard:** there are three ponds at Hall Farm, which are relics of an old moat, and the adjacent churchyard and paddock contain **flower-rich grassland**. Varied habitats. The banks of one pond are sandy and in places contain the burrows of **solitary wasps**, with similar activity occurring near the pond edge in the paddock. The churchyard and a nearby small horse-grazed paddock are notable for the occurrence of relatively **species-rich grassland**. The paddock has abundant wild flowers, with smaller amounts of musk mallow (Malva moschata) and bugloss (Anchusa arvensis), the **latter very rare** in London. St Cedd's Well, a grotto located in a separate fenced area to the south-west, is housed in a small building. This and the church are both **potential bat roosts**. **Stubbers Outdoor Pursuit Centre:** an area of former gravel pits, with **a good range of wetland and grassland habitats and some fine old trees.** Ponds. Veteran trees. Supports breeding **skylarks and meadow pipits**. Extensive planting of native broadleaves on the slopes of landscaped mounds will be of future benefit to other birds. A raised area to the east supports dry, acid grassland of common bent (Agrostis capillaris) and red fescue (Festuca rubra), with common centaury (Centaurium erythraea) and grey sedge (Carex divulsa), both **scarce in London**. The lakes are important for wintering wildfowl, and **tufted duck, mute swan and little grebe** breed. Common dragonflies occur in the summer. The ponds support a variable amount of emergent vegetation and may be of interest for **amphibians.** Much of the southern part of the site retains its original boundary of decaying oaks with much dead wood and a range of shrubs, including wild service-tree. There is a large and important **bat roost** on the site, and it is also an **important foraging area for bats** in this part of the borough. **Ockendon Railside:** the railway line from Upminster to Tilbury includes a very rich wooded cutting on either side of the M25 with **ancient woodland**. Havering's rail-sides form a network of valuable undisturbed habitats, acting as corridors to facilitate the movement of wildlife around the borough. There are good areas of habitat along all the borough's railways, with cuttings and embankments generally supporting the widest and best habitats.
374	Individual	I am a North Ockendon resident, writing to strongly object to the LDO proposal on the following grounds: 1. Consultation. The consultation period has been a challenge - 4 weeks to respond. The residents of North Ockendon (and wider area) should have been given an extended period to read almost 3000 pages of technical documentation. This was also backed up by our local MP Julia Lopez who recommended an extended period of time of 12 weeks. Also, using the LDO mechanism for this proposal does not offer detailed scrutiny of the plans and gives averages and offsets for the area which are not sufficient to satisfy the protection of the area and residents and future use. 2. Metropolitan Green Belt Land. The area in question is good quality farm land - on Metropolitan Green Belt surrounded by a Conservation Area. There are plenty of other areas that can be considered on brown field sites in the area. the National planning polity provides strong protection of Green Belt land to prevent urban sprawl, safeguard the countryside from encroachment and provide existing open spaces for communities to enjoy and in turn, preserving the character of the towns and villages already there. 3. Environmental impact will be everlasting. Openness of the area is already in place, there are pathways to enjoy the local habitat which consists of over 50 species of birds, Muntjacs, water voles, great crested newts, bats and provides a great habitat for a healthy eco system. This proposal will affect future generations forever. The London Borough of Havering pledged to protect the green belt and this is not what I call protection, if it is allowed to proceed.

		4. Health. The proposed development is opposite our house, and as a vulnerable person with a weakened immune system, I am concerned that my health will be seriously affected by the air pollution of this data centre campus, as well as the increased construction traffic which will be considerable and increase the risk to my health. This proposal is outside the ULEZ zone which is a consideration to protection of air pollution in the London Area. Not only is there a possible ambient 10 degree temperature increase in the area, there will be noise pollution as these data centres will be running mechanical heating and cooling 24 hours per day, 7 days per week; the construction increase in dust, noise, diesel fumes, petrol fumes will be increased during this period. 5. The Care Act 2014 states that the Government duty of care is a legal and moral obligation to avoid causing foreseeable harm, ensuring the safety, health and welfare of individuals under their responsibility. Public authorities MUST prevent negligence, adhering to both statutory duties and common law, often requiring proactive measures to achieve this. The duty includes promoting well-being, respecting personal dignity to dangerous areas. I would be interested to see how this will be achieved [redacted]! [redacted] there are 2 nursing/care homes adjacent to this site to which there has also been no consideration to. 6. Power. I understand that Warley Substation will be the hub providing the energy for this project. At a Digital Reef presentation, they stated that the Warley Substation was suitable and ready to support such a project (of which was witnessed by a large number of North Ockendon Residents), the truth is that further HV substations need to be built to accommodate the load required for such a huge project. This alone, suggests that this project could be built elsewhere where 132,000 KV pylons exist e.g. brown field sites which do not affect the green belt. There is no guarantee that power to our property will not be affected during the 20 year period of works with constant power outages - this needs special consideration and not just an average afterthought! 7. Water. The area already suffers from shortages of water, there is no detail of how the use of water will not affect local residents and its use. 8. Employment. The LDO proposal only states a small percentage of local labour requirement despite wide ranging propaganda about thousands of jobs for local people. The LDO use an average which is a very low percentage - this is not sufficient enough and should not be accepted by the LBH. 9. Relocation & Compensation. Due to the detrimental affect on the local area, there appears to be no consideration to residents - no re-dress or offer of compensation or compulsory purchase offer so that relocation of residents can be achieved if they so wish. This should be considered first and foremost as I have had my house valued prior to this proposal and the property now has no value and no chance of a sale during this 20 year period. I strongly object to this proposal and expect a response to all my issues raised in this email, prior to any conclusive outcome of the planning decision.
375	Individual	I object to this on the grounds that it is not a suitable development for the area. The water usage, heat, noise and light pollution from such a large development will cause irreparable damage to Havering's green belt. All, it seems, all for a hand full of silver.
376	Individual	This is greenbelt land. There is no special circumstance. Greenbelt is not to be built on.
377	Individual	I do not want the use of green belt land for this data centre, I'm worried about the damage it will do to wildlife, water tables, noise etc and more worrying is the precedent it sets and there any developer can buy up land and then build on it.
378	Individual	I object to this on the basis of destruction of green belt and farmland. Clearly construction traffic might also be an adverse effect.
379	Individual	Many years ago there were whole floors or whole buildings that had computer mainframes in. As technology moved on less and less space was required and my iPad holds a 100,000 times more than a 1970's mainframe. Should we be allowing data centres to destroy our green belt and farmland when we know in a few years time the continuing need for such space is unlikely to be necessary and will be superseded by technological innovation?
380	Individual	I live in Upminster and Object to the Data Centre for the following reasons :- It will be on green belt land It will not be good in fact it will be detrimental to the health of residents It will infringe on a large part of a conservation area It will have a catastrophic affect on wild life eg Badgers foxes rare and nesting birds ,frogs and newts and bats etc Surrounding areas will be disturbed maybe for as long as 8 to 10 years There will be continual noise pollution [redacted] and will be greatly affected by dust caused by large removals of soil Said soil will be transported through narrow lanes causing mud on the road and dangerous surfaces in wet weather There are many other more technical problems which i would appreciate you sharing before you even think of passing this proposal
381	Individual	I am writing to register my strong objection to the proposed East Havering Data Centre Campus Local Development Order (LDO) and its associated documents. The proposal is fundamentally incompatible with national planning policy, particularly the National Planning Policy Framework (NPPF), as well as the Care Act 2014 and must not be adopted. This LDO contradicts Havering Council's own Local Plan - The Havering Local Plan (2016–2031): • Protects the Green Belt

		• Directs major employment uses to designated industrial areas • Does not allocate North Ockendon for strategic employment • Does not identify a local need for data centres • Does not identify this site for release There should be: • A capacity study • A sequential test • A Green Belt alternatives assessment • A London-wide digital infrastructure needs assessment • A justification for the scale of the proposal • Evidence that this development must be in Havering • Evidence that the benefits are unique or irreplaceable Without these, the Very Special Circumstances argument collapses. 1. Failure to undertake Environmental Impact Assessment (EIA) The LDO attempts to authorise a 400,000 sqm industrial campus without an EIA. This is wholly inconsistent with: • NPPF Paragraph 188 – which requires that significant environmental effects are properly assessed. • NPPF Paragraph 194 – which requires adequate environmental information before decisions are made. • NPPF Paragraph 31 – which requires evidence to be "proportionate, robust and fit for purpose". The scale, nature, and duration of this development clearly constitute EIA development. Attempting to bypass EIA through an LDO is procedurally unsound and risks being ultra vires. 2. Catastrophic traffic impacts on Fen Lane and Ockendon Road The LDO permits 1,250 daily vehicle movements, including HGVs, LGVs, coaches, and shuttle buses, routed through narrow rural lanes. This directly conflicts with: • NPPF Paragraph 111 – development should be refused if it would result in an unacceptable impact on highway safety or severe cumulative impacts on the road network. • NPPF Paragraph 112(a–c) – requiring safe, suitable access for all users and prioritisation of pedestrian and cycle movements. • NPPF Paragraph 114 – requiring development to minimise the need to travel and reduce reliance on private car use. The Travel Plan itself admits that 79.5% of staff will drive, making the traffic impacts even more severe than presented. 3. Severe and irreversible harm to the Green Belt The entire site is Green Belt. The proposal is fundamentally incompatible with: • NPPF Paragraph 137 – Green Belt serves to prevent urban sprawl and safeguard the countryside. • NPPF Paragraph 138 – Green Belt boundaries should only be altered in exceptional circumstances. • NPPF Paragraph 147 – inappropriate development in the Green Belt is harmful by definition. • NPPF Paragraph 148 – substantial weight must be given to any harm to the Green Belt. • NPPF Paragraph 152 – development should protect and enhance valued landscapes. The S106 "Green Belt Mitigation Contribution" is not mitigation under the NPPF. You cannot compensate for Green Belt loss by upgrading unrelated parks. 4. The "Ecology Park" is not mitigation and conflicts with NPPF biodiversity policy The LEMMP reveals that habitats will take 5–15 years to reach target condition and that the Ecology Park is delayed until after 170,000 sqm of data centre floorspace is built. This conflicts with: • NPPF Paragraph 180(a–d) – requiring avoidance of harm, not delayed compensation. • NPPF Paragraph 181 – requiring measurable biodiversity net gain. • NPPF Paragraph 182 – requiring protection of irreplaceable habitats. The proposal destroys existing farmland, hedgerows, and wildlife long before any "replacement" habitat exists. 5. A 20-year LDO removes democratic oversight The LDO grants rolling permission for two decades, allowing major industrial development without future public consultation. This conflicts with: • NPPF Paragraph 39 – requiring early and meaningful community engagement.

		• NPPF Paragraph 41 – requiring transparency and public involvement in decision-making. • NPPF Paragraph 10 – requiring sustainable development through democratic planning processes. A 20-year blanket permission is incompatible with the NPPF's requirement for plan-led, participatory decision-making. 6. Noise, lighting, and amenity impacts are not properly assessed The documents lack detailed modelling of: • 24/7 HVAC and generator noise • Lighting impacts on residents and wildlife • Construction noise over two decades This conflicts with: • NPPF Paragraph 185(a–c) – requiring prevention of noise, light pollution, and adverse amenity impacts. • NPPF Paragraph 174 – requiring protection of tranquillity and local character. • NPPF Paragraph 130(f) – requiring development to create places with a high standard of amenity. Approving an LDO without this information is irresponsible and contrary to national policy. 7. Drainage, water use, and flood risk are inadequately addressed The site lies near the Mardyke River and includes reservoirs, ponds, swales, and major earthworks. This conflicts with: • NPPF Paragraph 159 – development must avoid flood risk and not increase risk elsewhere. • NPPF Paragraph 167 – requiring robust site-specific flood risk assessments. • NPPF Paragraph 169 – requiring sustainable drainage systems with clear maintenance arrangements. The drainage strategy is incomplete and cannot be approved at LDO stage. 8. The district heating network is speculative and undeliverable The S106 requires 40,000 MWh/year of waste heat, workshops for 30 years, and heat supplied at 0.00p/kWh, despite: • No network • No end-users • No funding • No route This conflicts with: • NPPF Paragraph 158 – requiring low-carbon infrastructure to be deliverable and viable. • NPPF Paragraph 16(b) – requiring plans to be realistic and achievable. • NPPF Paragraph 31 – requiring evidence to be robust and proportionate. The district heating element is theoretical and cannot justify the development. 9. Employment (Local) Data centre jobs are highly specialised and will not benefit the local workforce Data centres typically employ: • IT engineers • Network specialists • Cyber-security professionals • High-level technical staff • Remote monitoring teams (often off-site or overseas) These roles require specialist qualifications and experience that the local labour market does not possess at scale. The LDO provides no evidence that Havering residents have the skills required, nor any mechanism to ensure local recruitment. This conflicts with: • NPPF Paragraph 82(a) – requiring developments to meet local employment needs • NPPF Paragraph 83 – requiring realistic economic benefits The horticultural facility will not employ local people

		The Travel Plan explicitly states: “All produce workers must be transported to/from the site via assigned coaches… provided by the occupier.” This means: • Workers are not local • They will be housed in off-site accommodation • They will be transported in by coach • Local residents will not be eligible for these roles This directly contradicts any claim of local job creation. The S106 “local employment” obligations are weak, unenforceable, and time-limited The S106 Heads of Terms include: • A £50k per year contribution to Havering Works • A target of 20% local workforce within 10 miles • Apprenticeships equal to 5% of the construction workforce However: • These are best endeavours only, not binding requirements • “Local” includes a 10-mile radius, covering Thurrock, Brentwood, Barking & Dagenham, Redbridge, and parts of Essex • The majority of construction labour will be brought in by contractors • Data centre operational roles are not covered by meaningful obligations • The obligations expire when the LDO expires, even though the development is permanent This fails the NPPF requirement for clear, measurable, and enforceable economic benefits. The number of permanent jobs is extremely low for a development of this scale A 340,000 sqm data centre campus typically employs: • 50–80 staff per building, many of whom work remotely • A total of 200–300 permanent jobs across the entire campus For a development covering hundreds of hectares of Green Belt, this is a poor return. The NPPF requires economic benefits to be proportionate to the harm (Paragraph 148). They are not. The proposal may reduce local employment in the long term The development will: • Remove agricultural land • Displace rural businesses • Reduce tourism and recreation potential • Increase congestion, making local employment harder to access • Industrialise an area currently used for outdoor leisure, walking, and equestrian activity This contradicts: • NPPF Paragraph 84 – supporting rural economies • NPPF Paragraph 85 – protecting rural businesses and landscapes The “local jobs” narrative is being used to justify Green Belt harm without evidence The NPPF is clear: • Economic benefits must be real and evidenced (Paragraph 81) • Green Belt harm requires Very Special Circumstances (Paragraph 148) • Speculative or exaggerated benefits cannot justify Green Belt loss The applicant has not demonstrated: • How many jobs will be created • What types of jobs • What salaries

		• How many will be local • How they will be secured • How they will be monitored • How they outweigh the permanent loss of Green Belt The “local jobs” claim is therefore not a valid argument for such a loss of mass green belt land. Personal Impact Statement In addition to the policy conflicts outlined above, this proposal would have a direct and severe impact on my daily life, safety, wellbeing, and the character of the area I live in. I live in close proximity to Fen Lane and Ockendon Road, both of which are already narrow, rural, and unsafe for pedestrians. The LDO’s allowance of 1,250 daily vehicle movements, including HGVs, LGVs, coaches, and shuttle buses, would fundamentally change the nature of these roads. I would be forced to navigate significantly increased traffic, noise, and air pollution simply to leave my home. The risk to personal safety — particularly at peak times and during construction — would rise dramatically. The Care Act 2014 places a statutory duty on local authorities to promote individual wellbeing, including “personal dignity”, “physical and mental health”, “protection from abuse and neglect”, and “control over day-to-day life”. The scale and nature of this development — with 24/7 industrial activity, heavy traffic, noise, lighting, and prolonged construction — is fundamentally incompatible with those duties. The Council must consider how the LDO would undermine the wellbeing of residents, particularly those who rely on a stable, safe, and healthy environment. The proposal also threatens the rural character and tranquillity of the area, which is a key reason I chose to live here. The introduction of 24/7 industrial activity, high-mast lighting, security infrastructure, and continuous vehicle movements would erode the peaceful environment that residents currently rely on. This is not a minor change; it represents a complete transformation of the local landscape. The 20-year construction period alone represents an unreasonable and disproportionate burden. Residents would be subjected to decades of noise, dust, vibration, and heavy vehicle movements. This is not a temporary inconvenience — it is a long-term degradation of living conditions. The Green Belt surrounding my home is not simply a planning designation; it is a vital source of mental health, physical wellbeing, and environmental quality. Its loss would be felt personally and profoundly. The cumulative impact of air pollution, noise, lighting, traffic danger, and loss of landscape character would significantly diminish my quality of life and undermine the Council’s obligations under both the NPPF and the Care Act 2014. Conclusion This LDO is fundamentally inconsistent with the NPPF and must be refused. It would cause irreversible harm to the Green Belt, overwhelm local roads, damage biodiversity, and impose 20 years of industrialisation on a rural community. For the above reasons, the LDO would have a material, long-term, and unacceptable impact on my health, wellbeing, and the amenity of the area in which I live. I urge the Council to reject the East Havering Data Centre Campus LDO in its current form. I would also like to add a comment about the existing power at Warley Substation which was identified as being the only place that was suitable for this East Havering Data Centre Campus. The submission of two further substation applications within the LDO boundary demonstrates that the LDO is not deliverable and cannot lawfully be adopted. A Local Development Order must be self-contained and supported by necessary infrastructure. The fact that the developer and National Grid are already pursuing separate applications for substations proves that the existing power supply is inadequate and that the LDO depends on unapproved, unassessed infrastructure. This approach is procedurally unsound, contrary to the NPPF (Paragraphs 16(b), 31, 104, 147–148, 158, 174, 185, 188), and constitutes an improper attempt to avoid scrutiny by salami-slicing the project. The additional substations will cause additional Green Belt, landscape, ecological, and amenity harm that has not been assessed. The LDO cannot be considered deliverable or justified and must therefore be refused. Please can you add this additional comment in with my email of objection already submitted.
382	Individual	We would like to state our extreme concern about the above development at North Ockendon. As residents of Cranham, sceptics of the values of AI development and environmentalists, we are horrified by some of the statistics concerning energy and water requirements that, even if only partially accurate, would have a detrimental and lasting impact on our locality. The energy consumption of the site would dwarf that of Havering and Thurrock residents at a time when we, as a nation, are trying to downsize our reliance on fluctuating energy markets. We can imagine that this plant would have priority over residents when supplies are low and that is unacceptable. Even more worrying is the opinion of many that the amount of water needed to cool the systems could very likely drain the local water supplies and lower the water table considerably. As we

		residents live on clay soil on the edge of marshes, a lowering of the water table would result in drying out of the clay soil making the likelihood of subsidence of our properties a real threat. This is also unacceptable. It trumps any gain in new jobs, increased technology and recognition of Havering as a forward thinking authority. We speak for many friends, neighbours and family who share our horror of the lack of studies into the real impact of this development. We had welcomed the change of trajectory of the politics of Havering Council with many Resident councillors who are here for us not only at election time and who care about the small things that worry residents unlike the awful previous administration who prioritised big business. Please do fall into the trap by giving big business control again. Please can you acknowledge receipt of this email and give some serious thought to what residents (your voters) actually want from their representatives. We have everything crossed that this planning application is rejected.
383	Individual	I have heard of the above proposals in only the last few days. Such an outragious proposal will destroy our precious Green Belt. It is a hideous idea and must be refused.
384	Individual	Currently there are substantial amounts of the world's computer resources that are devoted to Crypto currency mining. It is difficult to understand how this provides any useful function to society. Seemingly not being useful, one wonders how much longer such activity will continue. Will demand for computer facilities reduce once in the long term common sense prevails? There are already existing suggestions as to how mining could be replaced and thereby reducing world computer facility requirements. Will we have built centres with computers, and destroyed green belt and farmland, which the world never needed? Do we know what the Havering facilities will be used for? Shall we get rid of some green belt to help some Crypto miners? I must confess I object . Some background information Both crypto mines and data centers are large, temperature controlled, warehouses filled with computers. Data Centers support multiple commercial uses such as e-commerce and cloud computing. They support multiple businesses and customers. Crypto Mines are dedicated solely to crypto mining and support only the owners of the crypto mine.
385	Individual	I object on this development for the following reasons.: It will take out of use good agricultural land, which will should retain to ensure some self sufficiency in food supplies It will take large quantities of water and electricity to run and maintain It will provide very few jobs once building work is completed and there will probably be little work for local labour It will set a precedent for other developments in the area
386	Environment Agency	Thank you for consulting us on the above East Havering Data Centre Campus draft Local Development Order (LDO). Based upon a review of the submitted information, we object to the proposed Local Development Order because there is insufficient information to demonstrate that the risk of pollution to controlled waters is acceptable and how the development will affect water biodiversity and wetland environments. This position is in line with paragraphs 187 and 193 of the National Planning Policy Framework (NPPF) which ensures prevention of pollution of controlled waters and recognises that the planning system should conserve and enhance the environment by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, planning permission should be refused. Policy 31 of the Havering Local Plan (adopted 2021) also states that any major development within 20m of the River Mardyke is required to investigate and secure opportunities to restore and enhance rivers and their corridors in line with the Thames River Basin Management Plan measures for enhancements. These include re-naturalisation, de-culverting, re-connecting rivers to their floodplains, in-channel enhancements, creating wetlands and reedbeds, tackling domestic plumbing misconnections, improving fish passage and eradicating and managing non-native species. We have the following comments to make on environmental considerations within our statutory remit. The comments are divided into: • Groundwater & Land Contamination • Watercourse Proximity, Biodiversity and the Water Framework Directive • Flood Risk • Water Resources & Water Quality

		Groundwater & Land Contamination This site is located underlain by Secondary A and Secondary (undifferentiated) Aquifers, Source Protection Zone 3 and nearby Mardyke. The site is considered to be of medium environmental sensitivity and could present potential pollutant linkages to controlled waters. Therefore, an assessment of potential contamination found in the proposed development site will need to be undertaken. If infiltration drainage is proposed, there must be an assessment of the risk posed from this. The guidance for this is linked in our references. We object to the proposed development because the document titled "EHDCC: Site Investigation / Environmental Search" dated 9 December 2020 (ref: 270273515) is not a Preliminary Risk Assessment or Site Investigation that we would expect to see under Land Contamination: Risk Management. We expect to see a report written to this standard. The Drainage & SuDS Strategy suggests that infiltration is not suitable for the site but does suggest that BRE365 soakaway testing is carried out – presumably to confirm this. Please follow the below SuDS Informative when considering the suitability of SuDS for this site: 1. Infiltration sustainable drainage systems (SuDS) such as soakaways, unsealed porous pavement systems or infiltration basins shall only be used where it can be demonstrated that they will not pose a risk to the water environment. 2. Infiltration SuDS have the potential to provide a pathway for pollutants and must not be constructed in contaminated ground. They would only be acceptable if a phased site investigation showed the presence of no significant contamination. 3. Only clean water from roofs can be directly discharged to any soakaway or watercourse. Systems for the discharge of surface water from associated hard-standing, roads and impermeable vehicle parking areas shall incorporate appropriate pollution prevention measures and a suitable number of SuDS treatment train components appropriate to the environmental sensitivity of the receiving waters. 4. The maximum acceptable depth for infiltration SuDS is 2.0 m below ground level, with a minimum of 1.2 m clearance between the base of infiltration SuDS and peak seasonal groundwater levels. 5. Deep bore and other deep soakaway systems are not appropriate in areas where groundwater constitutes a significant resource (that is where aquifer yield may support or already supports abstraction). 6. SuDS should be constructed in line with good practice and guidance documents which include the SuDS Manual (CIRIA C753, 2015) and the Susdrain website. For further information on our requirements with regard to SuDS see our Groundwater protection position statements (2018), in particular Position Statements G1 and G9 – G13 available at: https://www.gov.uk/government/publications/groundwater-protection-positionstatements. Overcoming our objection The applicant should provide a Preliminary Risk Assessment (PRA), including a Desk Study, Conceptual Site Model and initial assessment of risk, to satisfactorily demonstrate to the Local Planning Authority that the risk to controlled waters has been fully understood and can be addressed through appropriate measures. Advice to Applicant 1. Refer to our 'Groundwater Protection' website. 2. Refer to our Land Contamination: Risk Management website when dealing with land affected by contamination. This is based on CLR11 which is archived within CL:AIRE Water and Land Library (WALL), and also includes the Guiding Principles for Land Contamination for the type of information that we require in order to assess risks to controlled waters from the site. The Local Authority can advise on risk to other receptors, for example human health. 3. Refer to our Land Contamination Technical Guidance. 4. Refer to 'Definition of Waste: Development Industry Code of Practice'. 5. Refer to British Standards BS 5930:1999 A2:2010 Code of practice for site investigations and BS10175:2011 A1: 2013 Investigation of potentially contaminated sites – code of practice. 6. Refer to 'Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention' published by CL:AIRE, March 2025. The selected method, including environmental mitigation measures, should be presented in a 'Foundation Works Risk Assessment Report', guidance on producing this can be found in section 17 of the above. Refer to our 'Good Practice for Decommissioning Boreholes and Wells'. 7. Refer to our 'Dewatering building sites and other excavations: environmental permits' guidance when temporary dewatering is proposed. Watercourse Proximity, Biodiversity and the Water Framework Directive We object to the proposed development because the submitted documents indicate that changes are proposed within 8 metres of the top of the bank of the watercourse and/or within the watercourse and the information provided does not give enough evidence to show that the proposals will not have a detrimental impact on the biodiversity, fisheries and physical habitats and The Water Environment Regulations 2017 requirements. In addition, some or all of the proposals have the potential to require: • a flood risk activity permit under the Environmental Permitting (England and Wales) Regulations 2016

		• an impoundment licence under Section 25 of the Water Resources Act 1991 • an abstraction licence under Section 24 of the Water Resources Act 1991 • a compliant fish or eel pass and/or screening under the Salmon and Freshwater Fisheries Act 1975 and/or The Eels (England and Wales) Regulations 2009 which are unlikely to be granted with the current level of detail being provided. The current proposals indicate that a cooling system for the data centre is being proposed however the supporting documents provided do not adequately show that it will not have a detrimental impact on the watercourse, its corridor and associated ecology and fisheries. Specifically, section 4.2 of the SUDS and Drainage strategy states that "approximately 30%" of the cooling process water "will be discharged to foul following use." We require confirmation on (ii) where on the site the other 70% will be utilised or discharged, and (ii) the expected temperature of this water at the point of discharge into the watercourse. We are concerned that water heated above normal, ambient river temperatures will be discharged into highly sensitive River Mardyke habitats highlighted in several of the ecology reports and the proposed habitats created in the Ecology Park. With the current level of information provided, we are unable to rule out potential to cause harmful impacts to river habitats for fish and eels dependent on stable, cool environments to survive and thrive. In addition to this, when determining the Flood Risk Activity Permit for this development, we will assess its compliance with the Thames River Basin Management Plan (RBMP). We will consider how the development will affect water biodiversity and the wetland environment. The RBMP states that the water environment should be protected and enhanced to prevent deterioration and promote the recovery of water bodies. A Water Framework Directive Assessment (WFD) must be produced to identify the impacts to the ecological, hydromorphological, physical habitats, chemical status and WFD quality elements and determine if they may be at risk of deterioration and prevent the waterbody from achieving good potential. The submitted documents provided indicate a potential for abstraction and/or discharge of water from/to the Mardyke watercourse. Any changes to the hydrology can impeded the river's ability to mobilise, erode or deposit sediments. These natural processes are important as they underpin the river's ability to create and sustain habitats and features. Therefore, the WFD assessment must include a hydrology study, identifying and quantifying impacts to sediment transport. In line with the Thames River Basin Management Plan we recommend that the proposed development is used as an opportunity to restore more natural processes to the watercourse using measures like the ones detailed above. This would offer a significant environmental gain. Overcoming our objection 1. A Water Framework Directive assessment is required to assess how the proposed development will affect species, habitats, hydromorphology and fisheries This assessment will need to: • identify the impacts to the ecological, hydromorphological, physical habitats, chemical status and WFD quality elements and determine if they may be at risk of deterioration and prevent the waterbody from achieving good potential. • propose wildlife/habitat enhancement measures including in-stream habitat enhancements that align with Local Plan policies, Thames River Basin Management Plan measures and can demonstrate how these achieve WFD objectives, enhancing waterbodies to achieve good potential. • detail any proposed abstraction/discharge from the Mardyke waterbody. In the event that abstraction or discharge is proposed, a detailed hydrology assessment shall be carried out to identify and quantify impacts to sediment transport. • details any temperature changes to river water. This detail should confirm (i) where the other 70% of water used for the data centre cooling will be utilised or discharged, and (ii) if applicable, he expected temperature of this water at the point of discharge into the watercourse. • demonstrate how the development has used the mitigation hierarchy and is designed to avoid adverse impacts along the watercourse corridor. • propose timing of any onsite works to avoid impacts on protected species and fish. • Include details of a compliant fish/eel pass and/or screen where applicable. 2. We request an update to the EIA 'Chapter 11 – Ecology' to assess the impact of the development on fish and eels including the impact to their riverine habitats and provision of fish and eel passage, following the "avoid, mitigate, compensate and enhance" hierarchy. We expect fish and eel specific mitigations to compensate for activities that may lead to impacts on fish and eel habitats, specifically for any dewatering of ditches to be diverted or removed that are known to have fish presence to maintain and ensure fish and eel passage is maintained and improved as a result of the development. There should also be a section detailing existing invasive, non-native species on the development site and eradication and management strategies for each species using guidance from the Non-Native Species Secretariat. Advice to Local Planning Authority

		Natural England should be consulted as BNG metrics have been submitted, as well as their ongoing involvement with Great Crested Newt licensing for this development. Informative Please be aware that proposed work in relation to any of the below statements will require a Flood Risk Activity Permit. Environmental permit – Flood risk activities - advice to applicant The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities: • erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge • altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work • building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river • dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed • diverting or impounding the flow of water or changing the level of water in a main river • quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert • any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river • any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river • any activity within 16 metres of a sea defence structure • activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places) For further guidance please visit Flood risk activities: environmental permits GOV.UK or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing enquiries@environmentalagency.gov.uk. The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity. Flood Risk Our Flood Map for Planning shows the site lies within fluvial Flood zones 3b, 3a & 2, defined by the 'Planning Practice Guidance: Flood Risk and Coastal Change' as respectively being the functional floodplain, high and medium probability of flooding zones. The proposal is for a Local Development Order associated with East Havering Data Centre Campus and a horticultural (greenhouse) building, both considered 'less vulnerable' development, as defined in Annex 3:Flood Vulnerability classification of the National Planning Policy Framework. We are satisfied that the submitted FRA: • Proposes all the data centre building zones and the proposed reservoir sequentially within Flood Zone 1, outside of the 1% AEP + an allowance for climate change flood extent. • Proposes the horticulture (greenhouse) building zone sequentially located within Flood Zone 1, although is partially within the 0.1% AEP flood extent. The landscaping (mounds) on site are also sequentially located to be outside of the 1% AEP + an allowance for climate change flood extent. Section 5.2.2 of the FRA details a minimal overlap of a few pixels within the 1% (1 in 100) annual probability flood event including climate change which just touches the edge of one of the proposed mounds. We are satisfied that the FRA has assessed this and that compensatory storage is not required in this instance. The only proposals in areas at flood risk is the creation of a wetland ditch network and walkways associated with the wetland creation area. The applicant should note that any walkways located within the 1% AEP +an allowance for climate change flood extent must be located at least 600mm above the flood level. Water Resources & Water Quality Water Quality We have no concerns with the foul water proposal outlined in the EHDCC SUDS and Drainage Strategy, section 4.2. We are pleased to see the proposal will connect to the mains sewer network and that Anglian Water have approved of the connection from the two new on-site pumping stations. We would encourage continued liaison with Anglian Water to ensure there is capacity in the network and at the treatment works before the site is operational.

		In section 4.3 there is brief detail of surface water during construction. We welcome further detail on the water management and requirements, both of surface water and foul water, further on in the application process. We also have no concerns with the foul water impact assessment made in the Environmental Statement Chapter 4, section 4.108, and Chapter 12, section 12.71-12.72. Foul flows are to be connected to the main sewer network and Anglian Water has confirmed there is capacity in both the network and treatment works. Again, we would recommend continued liaison with Anglian Water to ensure there is still sufficient capacity before the site is operational. Water Resources We don't have enough detail to support the Environmental Statement's (Chapter 12) assessment of the water needs of the site, or whether there are adequate water supplies available. It is not clear from the Environmental Statement whether there have been discussions with Essex and Suffolk Water (ESW) regarding its ability to supply the development, or whether the forecast demands from the development have been accounted for in the company's current (2024) Water Resources Management Plan (WRMP)? Therefore, we advise that the applicant engage in conversation with the company to ensure that supply can be achieved for the development. We would expect the proposal to be supported by a water utility statement that demonstrates adequate supplies can and will be provided. If the development's water demands are not sourced from a water company, then please be aware that there is limited availability of water from ground and surface water sources in this locality. Please refer to the Essex Abstraction Licensing Strategy (ALS) 227 10 SD01 XXXX Abstraction Licensing Strategy" for more information on the potential for new abstraction licences. We support the intention to utilise rainwater harvesting as part of the developments water needs. The Environmental Statement identifies that the quantity of rainwater harvesting is not guaranteed and therefore has not been used in the calculation of water demands, which we agree with. We recommend that the assessment of rainwater harvesting also considers a dry average rainfall scenario to identify the potential range of benefit that could be generated and what shortfall in dry year demands would need to be supplied by mains water from the water company or alternative sources. In addition, we would question the choice of rainfall period (1941 – 70) for the current assessment. This period is not going to pick up the dry/drought periods from the 1990s onwards or more recent trends in climate change. We would strongly recommend using a more recent period for the assessments and based off rain gauges as close to the proposed location as possible. It should also be noted that any captured water from rainfall or hardstanding run-off would need to be stored in a reservoir that is discrete from the ground and surface water system for it to be abstracted from subsequently. Storing the water in reservoirs that are connected to the surface or groundwater system would require an abstraction licence and this is likely to preclude abstraction at times other than high river flows in the winter months (Nov- March). We assume that the information provided for the cooling water demands are based on an open loop (evaporative) cooling system. Given the significant pressures on water resources in this area, we would strongly encourage consideration of less water intensive forms of cooling to be considered in the Environmental Statement and an appraisal of how this would affect total water requirements, both on average and critically during peak cooling periods. The location of this development is in an area of serious water stress (as identified in our report Water stressed areas – 2021 classification(https://www.gov.uk/government/publications/water-stressed-areas-2021-classification). Developments have the potential to increase demand for water and result in increased abstraction from groundwater sources. Water companies may need to put new strategic plans in place to supply growth from sustainable sources. The long-term viability of supplying new developments should be considered, and the phasing of growth should ideally link to the timings of any planned new strategic schemes. Where this is not possible, then consideration should be given to how the development can help to minimise any interim risks until new sustainable sources of water can be developed. Construction Period The water used during the construction phase needs to be considered separately to the water to be used during the operational phase of the development. Most water related construction activities, including dewatering and dust suppression are licensable activities if they abstract more than 20 m3 a day and as such, early consideration should be given to where the water can be sourced from and the water company isn't the provider. New consumptive groundwater licences are not available and surface water is restricted to high flows only. New dewatering will need to demonstrate that it is non-consumptive to the local environment to obtain an abstraction licence. Dewatering by other means, for example, construction of drainage ditches, needs to be discussed with the Lead Local Flood Authority (LLFAs). Operational Period We recommend that non-domestic demand and domestic demand be dealt with separately whenever possible. Non-domestic

		Any non-domestic development should be as water efficient as possible, achieving full BREEAM credits, with a minimum of 3 credits in WAT01 for new, extended or redeveloped non-household development, as per the Shared Standards in Water Efficiency for Local Plans. Domestic – Water Efficiency and Re-use Some of the services to developments such as offices may qualify as domestic in nature. Essex & Suffolk Water is heavily reliant on the success of demand management measures to maintain customer supplies until new strategic sustainable supplies of water can be developed. Planning applications should seek to achieve greater water efficiency and re-use in their designs (beyond the standards within current adopted local plan policies) wherever possible to help the address water scarcity issues and to minimise the risk of harm to habitats and deterioration to waterbodies. We strongly recommend the applicant refers to the Shared Standards in Water Efficiency for Local Plans for further guidance and evidence on how our expectations for water efficiency in new developments. Specific comments on Environmental Statement with respect to Water Resources 12.22 Receptor Sensitivity Criteria We question the view that a currently Poor status surface water body (SWB) should be Low Sensitivity. This does not consider the Water Framework Directive Objectives of the SWB. For example, if the Objective is to get the SWB back to Good status, then does the proposed development hinder that Objective being met? A WRMP that identifies a balance or surplus supply doesn't automatically mean the impact is low sensitivity. If the WRMP doesn't factor in your proposed demands, then there may not be the headroom in the plan, or that headroom is allocated to other growth. Also, the WRMP may have options to resolve any supply deficits, but if the current WRMP forecasts do not include your proposed demands, then do the WRMP options provide enough water for your needs? Potable Water Demand Increase 12.50 The construction of the proposed development would lead to a temporary increase in potable water demand, when compared to the existing use, due to the introduction of temporary construction activities; such as welfare facilities. Could the applicant clarify what is meant by "when compared to the existing use"? Is this referring to the current supply/abstraction by the water company? Or compared to any existing water use on the site (non-water company)? If referring to current abstraction on the site, then the assessment needs to consider what the purpose of that abstraction is and how its quantities and pattern of use compare to the forecast needs during the construction period. 12.51 Any direct impact on the network asset infrastructure would be managed by appropriate consents. The potable water resource is of medium sensitivity. However, as the works would be temporary, and the scale of abstraction during construction would be negligible in terms of regional supply (low magnitude of impact), the increase in potable water demand during construction would have a temporary, medium to long-term, indirect, Negligible to Minor Adverse effect (not significant). It is not clear what is meant by “would be managed by appropriate consents” or what types of consent this could be by example? Does this mean the water company's overall supply at the Company scale, or the Water Resource Zone scale? The impacts of abstraction are point specific. It may be a small quantity of water compared to overall company supply level, but the assessment needs to consider the impacts of abstraction are assessed against the local environment, where it may not be negligible. 12.63 Data centres typically utilise large amounts of water within their cooling systems. Data Centre technology is evolving and therefore the design of the proposed development may be subject to change. Emerging technologies are likely to lessen or potentially remove the need for water within the cooling systems over the lifetime of the proposed LDO. We would advise that the ES sets out what is possible with current technology for data centres and considers the relative water requirements of existing alternative cooling systems and how this would affect the demand required from ESW. Charged Advice Service For non-statutory consultations, the Environment Agency offers a discretionary charged advice service. As part of this service, we can provide advice on concerns and issues that are relevant to our planning remit. This service offers a dedicated project manager and access to expert advice from our internal technical teams which can help resolve any environmental concerns relevant to our remit and avoid the need for us to raise concerns at the statutory consultation stage. For more information or to request access to this service, please email: HNLsustainableplaces@environment-agency.gov.uk. Further information on our charged planning advice service is available at: Planning and marine licence advice standard terms for our charges - GOV.UK
387	Natural England	Planning consultation: East Havering Data Centre Campus – Draft Local Development Order Location: North Ockendon, Havering Thank you for your consultation on the above dated 25 February 2026 which was received by Natural England on the same date. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future

		generations, thereby contributing to sustainable development. Natural England has considered the Local Development Order (LDO) document in relation to our interests and has the following comments: Designated Sites The development site, covering some 215 hectares, is situated in proximity to several Sites of Special Scientific Interest (SSSIs) as well as Habitats Sites which form part of the National Site Network. These include (but are not limited to): - Thames Estuary & Marshes (Ramsar) - Thames Estuary & Marshes (SPA) - Mucking Flats and Marshes SSSI - Ingrebourne Marshes SSSI - Inner Thames Marshes SSSI - Hornchurch Cutting SSSI - Thorndon Park SSSI - Langdon Ridge SSSI - Hangman's Wood & Deneholes SSSI - Grays Thurrock Chalk Pit SSSI - Purfleet Chalk Pits SSSI - Purfleet Road, Aveley SSSI - Globe Pit SSSI - Vange & Fobbing Marshes SSSI - Pitsea Marsh SSSI The designated sites in the area will need to be considered for any potential impact from the proposals. Habitats Regulations Assessment Despite the proximity of the application to European Sites, the consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. It is Natural England's advice that the proposal is not directly connected with or necessary for the management of the European site. Your authority should therefore determine whether the proposal is likely to have a significant effect on any European site, proceeding to the Appropriate Assessment stage where significant effects cannot be ruled out. Natural England must be consulted on any appropriate assessment your authority may decide to make. Natural England advises that there is currently not enough information provided in the application to determine whether the likelihood of significant effects can be ruled out. London Local Nature Recovery Strategy Natural England recognises the recently published London Local Nature Recovery Strategy (LNRS) as a statutory spatial framework prepared under the Environment Act 2021, intended to guide strategic decisions by public bodies and major developers. The LNRS identifies existing biodiversity assets, priority habitats and species, and critically opportunity areas where development can play a positive role in nature recovery. For large, long-term infrastructure and employment uses such as data parks, the LNRS provides an important mechanism for moving beyond site-by-site ecological mitigation towards landscape-scale enhancement, connectivity and resilience. In this regard, LNRS alignment is especially relevant where development proposals encompass extensive landholdings and long operational lifespans. Natural England considers that the proposed Data Park, when shaped by the London LNRS, presents an opportunity to substantially reduce these risks and deliver strategic biodiversity gains. Strategic habitat recovery, not isolated mitigation The LNRS identifies the wider East Havering and Thames Estuary fringe as an area of high opportunity for habitat creation and restoration, particularly for grasslands, wetlands, woodland and river-associated habitats. The proposed Ecology Park responds positively to these priorities by: • Delivering habitat creation at a meaningful, landscape scale, rather than relying solely on small or isolated features. • Creating a coherent mosaic of grassland, wetland, scrub and woodland habitats. • Supporting longer-term recovery trajectories consistent with LNRS objectives.

		This approach reflects Natural England's preference for strategic enhancement rather than piecemeal compensation. Strengthening ecological connectivity A core principle of the LNRS is the creation and reinforcement of ecological networks, allowing species movement and adaptation in response to climate change. The LNRS-led design approach supports: • Retention and enhancement of existing hedgerow and ditch networks. • New habitat corridors linking the River Mardyke, attenuation features and woodland blocks. • Reduction of barrier effects through sensitive lighting, noise management and landscape design. Natural England considers this to be beneficial, as ecological connectivity is a frequent weakness of large developments that otherwise achieve numerical biodiversity net gain. Biodiversity and wider environmental gains Advice relating to biodiversity net gain is provided within Annex A of this letter however we have provided some advice below on potential opportunities for wider environmental gains that the site could deliver. Thames Terrace Grassland – a strategic enhancement opportunity Whilst Natural England acknowledges the range of habitats proposed within the draft Landscape and Ecological Management Plan (LEMP), we wish to highlight a specific opportunity of strategic significance: the creation and expansion of Thames Terrace Grassland (TTG) habitat. TTG is a rare and geographically restricted grassland type, closely associated with the river terraces and climatic conditions of the Thames Estuary. It is characterised by: • Free-draining, low-nutrient sands and gravels. • Warm, dry microclimatic conditions. • High diversity of specialist plants and invertebrates. These habitats are among the most biodiverse grasslands in southern England yet are under significant pressure from development. TTG is identified as a conservation priority within the Essex Local Nature Recovery Strategy, to which the project site is adjacent. Geological suitability Natural England understands that part of the proposed Data Park site lies above river terrace deposits within the Black Park Gravel Member, which is potentially suitable for TTG habitat creation. We note that the applicant may already hold subsurface data from trial pits, boreholes or ground investigations, which could be used to ground-truth British Geological Survey mapping and confirm opportunities for habitat delivery. Soil nutrients and earthworks Given the site's current arable use, Natural England acknowledges that soil nutrient levels are likely to be too high to support TTG in its target condition. However, the necessary intervention, topsoil stripping to expose the underlying gravels or sands, is well understood. In Natural England's view, this intervention may be relatively straightforward to integrate with the anticipated earthworks associated with the development. The resulting grassland communities would typically tend towards: Lowland acid grassland, with transitions into neutral grassland and scrub-rich mosaics, all of which fall within recognised Priority Habitat classifications. Biodiverse roofs and species-specific benefits Natural England also highlights the opportunity presented by the form of a Data Park for the integration of biodiverse (substrate-based) roofs. With appropriate design, such roofs can be tailored to support: • Specialist invertebrate assemblages. • Black redstart (Phoenicurus ochruros), a nationally scarce breeding bird associated with post-industrial landscapes in the Thames Estuary. Black redstart is identified as a priority species within the London LNRS, and the Havering Data Park represents an opportunity to make a meaningful contribution to local and regional conservation objectives for this species. Strategic collaboration opportunities

		Natural England notes the proximity of the site to the route of the proposed Lower Thames Crossing Nationally Significant Infrastructure Project (NSIP). We consider that there may be opportunities for collaborative working in relation to habitat creation, ecological connectivity and landscape-scale mitigation or enhancement. Natural England would welcome further discussion on this matter. Air Quality Natural England advises that the potential for air quality impacts arising from this development needs to be assessed. Natural England refers your authority to Standing Advice 'Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site. This standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. An overall conclusion regarding impacts on statutory protected sites* must take into account the standing advice for air pollution. This will be for your authority to determine. *(Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), and Wetlands designated to be of international importance under the Ramsar Convention (or Ramsar sites).* Based on the plans submitted, no other environmental impacts have been identified that will have a significant impact on statutory protected sites. Soils and Agricultural Land Quality Having considered the proposals as a consultation under the Development Management Procedure Order (as amended), and in the context of national planning policy for the protection of the 'best and most versatile' (BMV) agricultural land as set out in Paragraph 174 of the National Planning Policy Framework, Natural England draws your Authority's attention to the following agricultural land quality and soil considerations: While the Havering Local Plan does not contain a standalone policy on Agricultural Land Classification, it includes several policies that require the protection and enhancement of land, soils and associated environmental functions. Policies 27 (Landscaping), 29 (Green Infrastructure) and 30 (Nature Conservation) require development to retain and enhance the natural environment, support biodiversity and natural habitats, and secure long-term management of landscape and ecological assets. Soil quality and soil management are integral to the delivery of these policies, particularly where development proposals involve extensive earthworks, habitat creation or long-term landscape change. In this context, the protection, appropriate handling and beneficial reuse of soils should be addressed comprehensively as part of the application, having regard to national policy and local environmental priorities. Planning policies and decisions should contribute to and enhance the natural and local environment by: - NPPF 187(a) protecting and enhancing [...] soils (in a manner commensurate with their statutory status or identified quality in the development plan); - NPPF 187(b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.' - NPPF 188 Plans should: distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework Footnote 62: Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The availability of agricultural land used for food production should be considered, alongside the other policies in this Framework, when deciding what sites are most appropriate for development Soil is a finite resource which plays an essential role within sustainable ecosystems, supporting a range of ecosystem services, including storage of carbon, the infiltration and transport of water, nutrient cycling, and provision of food. A soil resource survey has not been provided with this application and given the size of the area being considered this should form a part of the information required to determine impacts and the required mitigation if any is needed. Consequently, Natural England would advise that any grant of planning permission / Local Development Order should be made subject to conditions to safeguard soil resources, including the provision of an appropriately experienced soil specialist to advise on and supervise soil handling, including identifying when soils are dry enough to be handled. Sustainable soil management should aim to minimise risks to the ecosystem services which soils provide, through appropriate site design/masterplan/Green Infrastructure. Defra has published

		a Construction Code of Practice for the Sustainable Use of Soils on Construction Sites which may be helpful when setting planning conditions for development sites. It provides advice on the use and protection of soil in construction projects, including the movement and management of soil resources, which we strongly recommend is followed. The British Society of Soil Science has published the Guidance Note Benefitting from Soil Management in Development and Construction which sets out measures for the protection of soils within the planning system and the development of individual sites, which we also recommend is followed. Please note that if your authority is minded to grant planning permission contrary to the advice in this letter, you are required under Section 28I (6) of the Wildlife and Countryside Act 1981 (as amended) to notify Natural England of the permission, the terms on which it is proposed to grant it and how, if at all, your authority has taken account of Natural England's advice. You must also allow a further period of 21 days before the operation can commence. Further general advice on consideration of protected species and other natural environment issues is provided at Annex A. Should the developer wish to discuss the detail of measures to mitigate the effects described above with Natural England, we recommend that they seek advice through our Discretionary Advice Service. If you have any queries relating to the advice in this letter please contact me on Should the proposal change, please consult us again. Yours sincerely, Higher Officer Thames Solent Team Annex A – Natural England general advice Wider landscapes Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) - Landscape Institute for further guidance. Biodiversity duty Section 40 of the Natural Environment and Rural Communities Act 2006 (legislation.gov.uk) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the Complying with the biodiversity duty - GOV.UK (www.gov.uk) for further information. Designated nature conservation sites Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered. A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see Habitats regulations assessments: protecting a European site - GOV.UK (www.gov.uk) and Natural England must be consulted on 'appropriate assessments' (see Appropriate assessment - GOV.UK (www.gov.uk) for more information for planning authorities). Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the SSSI Impact Risk Zones (England) (arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified (Sites of special scientific interest: public body responsibilities -GOV.UK (www.gov.uk). Air Quality Natural England has produced 'Air pollution and development: advice for local authorities. How to assess sector-specific planning applications that could affect air quality on a protected site'. This standing advice is to help planning authorities understand the impact on statutory protected sites from particular developments that emit specific air pollutants. The advice covers emissions of ammonia (NH3), nitrogen oxides (NO, NO2 or NOx), nitrogen deposition, acid deposition and sulphur dioxide (SO2).

		The standing advice is Natural England's formal statutory advice and is a material consideration. It provides decision makers with the information needed to fulfil their statutory duties when making decisions on planning applications with potential air pollution impacts. Note that this advice cannot be used to assess Nationally Significant Infrastructure Projects (NSIPs)or local plans. Protected Species Natural England has produced Protected species and development: advice for local planning authorities - GOV.UK (standing advice) to help planning authorities understand the impact of particular developments on protected species. Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to Wildlife licences: when you need to apply (www.gov.uk) for more information. Local sites and priority habitats and species The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging Local nature recovery strategies - GOV.UK (www.gov.uk) may also provide further useful information. Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to Habitats and species of principal importance in England (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the Brownfield Hub - Buglife for more information and Natural England's Open Mosaic Habitat (Draft) - data.gov.uk (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments. Biodiversity and wider environmental gains Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Unless exempt major development (defined in the National Planning Policy Framework (publishing.service.gov.uk) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement was extended to minor development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from May 2026. Biodiversity Net Gain guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the Biodiversity Net Gain Planning Practice Guidance (gov.uk). The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to Calculate biodiversity value with the statutory biodiversity metric for more information. For minor development sites, The Small Sites Metric may be used where these sites meet the criteria to use this Small Sites Metric. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met. The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered. Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on Sites of Special Scientific Interest: managing your land Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193).

		Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife. The Environmental Benefits from Nature Tool - Beta Test Version - JP038 (naturalengland.org.uk) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric. Natural environment - GOV.UK (www.gov.uk) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain. Ancient woodland, ancient and veteran trees The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The Natural England Access to Evidence - Ancient woodlands Map can help to identify ancient woodland. Natural England and the Forestry Commission have produced Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK (www.gov.uk) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances. Best and most versatile agricultural land and soils Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the Guide to assessing development proposals on agricultural land - GOV.UK (www.gov.uk). Find open data - data.gov.uk on Agricultural Land Classification or use the information available on MAGIC (defra.gov.uk). The Defra Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (publishing.service.gov.uk) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to Reclaim minerals extraction and landfill sites to agriculture - GOV.UK (www.gov.uk), which provides guidance on soil protection for site restoration and aftercare. The Soils Guidance (quarrying.org) provides detailed guidance on soil handling for mineral sites. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site. Green Infrastructure For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to Green Infrastructure Home (naturalengland.org.uk) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales. Development should be designed to meet the 15 GI How Principles (naturalengland.org.uk). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate. The Green Infrastructure Map (naturalengland.org.uk) and GI Mapping Analysis (naturalengland.org.uk) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision. Access and Recreation Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure. Rights of Way, Access land, Coastal access and National Trails: Paragraphs 105, 185, 187 and 193 of the NPPF highlight the important of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to Find your perfect trail, and discover the land of myths and legend - National Trails for information including contact details for the National Trail Officer.

		The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route. Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails. Further information is set out in the Planning Practice Guidance on the Natural environment -GOV.UK (www.gov.uk).
388	Individual	Objection to the East Havering Data Centre Campus Local Development Order LDO0001.26 I am writing as a long-standing resident of Havering to register my strong objection to the proposed East Havering Data Centre Campus Local Development Order (LDO): Planning Reference Ref: LDO0001.26 Across the consultation documents, there are major inconsistencies, omissions and methodological weaknesses. Due to the very large, complex and highly fragmented set of documents I have not been able to fully assess all materials as thoroughly as I would have liked in the limited time allowed. However, I have set out my objections and findings underlying that opinion in summary below, with a later detailed analysis under each heading in Section 2. 1 SUMMARY OF KEY ISSUES 1.1 Substantial and Irreversible Green Belt Harm Core Issue: For me and I believe for many residents a key attraction of Havering is its proximity to green spaces. The proposed LDO would permit the development of a large-scale data centre campus on about 218 hectares of designated Green Belt land, comprising up to 400,000 m^2 of built floorspace, buildings up to 35 metres in height, extensive hardstanding, security infrastructure, substations, up to 286 oil powered generators, construction phased over 17–20 years. The proposal is described as potentially the largest data centre campus in the UK or Europe and would constitute a permanent transformation of open countryside into a major industrial complex. This is completely out of character for the area and combined with the many other developments proposed in this narrow stretch of Green Belt will effectively extend the London urbanisation out towards the Laindon/Basildon & Southend-on-Sea urban areas. This visualisation illustrates just how dramatically this development would change this rural landscape.  *Panoramic image: Tim Stout*  *Virtual Data Centre model: John Robinson* Key Failures: • Policy Non-Compliance: The development directly conflicts with the National Planning Policy Framework (NPPF), which prohibits inappropriate development in the Green Belt unless “very special circumstances” exist. The Council’s own evidence confirms the site is not “grey belt” but

		high-performing Green Belt. • Inadequate Alternatives Assessment: The LDO fails to robustly assess alternatives, consider brownfield land, or minimise Green Belt harm, as required by NPPF. • Spatial and Visual Harm: The proposal includes industrial-scale buildings, security fencing and extensive hardstanding, completely transforming the open, rural landscape and introducing urbanising influences. • Loss of Openness: The site is currently wholly open and rural, with no urbanising features. The development would severely damage openness, a core Green Belt purpose and weaken the strategic gap between settlements. Contradictions and Misrepresentations: • The Council's Green Belt Assessment Report (GBA) acknowledges the site's strong contribution to Green Belt purposes, yet the LDO proceeds as if it were "grey belt." • Mitigation proposals, such as tree planting, are insufficient to offset the long-term, large-scale harm. • The scale and impact of the development are incompatible with the LDO mechanism, which is intended for low-impact, small-scale projects. Conclusion: The proposed LDO cannot be justified on Green Belt grounds. The harm to openness, landscape and the strategic gap between settlements is substantial, permanent and irreversible. 1.2 Failure to Demonstrate Very Special Circumstances (VSC) Core Issue: The proposed LDO fails to meet the Very Special Circumstances (VSC) test required by the National Planning Policy Framework (NPPF) to justify inappropriate development in the Green Belt. The applicant's case is speculative, unquantified and contradictory and the claimed benefits do not outweigh the substantial, permanent harm to the Green Belt. Key Failures: Unproven Need: The need assessment relies on global market forecasts, generic trends and vague assumptions about anticipated demand or expected growth, rather than site-specific, quantified evidence. It does not justify why 340,000 m^2 of data halls, this specific site, or a 17–20-year construction programme are necessary. No robust case is made for why smaller, brownfield, or alternative sites could not meet the same need. Power Infrastructure Uncertainty: The development depends on unconsented infrastructure, such as a new Warley GSP substation and power cable routes that may lie outside the LDO boundary. The power cable route is not fixed and some land surveys are missing. A VSC case cannot rely on uncertain or unassessed infrastructure. Artificially Constrained Alternatives: The "Sites Assessment" uses self-serving criteria e.g., requiring a single 200+ hectare site in East London, that exclude brownfield and industrial alternatives. The search process is biased toward the applicant's preferred site, not a genuine exploration of less harmful options. Unquantified and Non-Unique Benefits: Claimed economic benefits: job creation, economic uplift and power/data accessibility opportunities are vague, inconsistent and not unique to this site. Data centres are not major job creators and similar benefits could be achieved elsewhere without harming the Green Belt. Weak Sustainability Claims: Promises of waste heat reuse, renewable energy and biodiversity net gain are unverified, speculative, or undermined by the project's design. The use of 286 oil-powered generators (with significant emissions and potential reliance on unsustainable fuels) contradicts claims of low-carbon development. Environmental and Health Risks: The project's massive carbon footprint, air quality impacts and uncertain biodiversity gains further weaken the VSC case. Off-site compensation and long-term habitat management assumptions are not

		sufficient to offset the harm. Conclusion: The applicant has not demonstrated Very Special Circumstances. The claimed benefits are speculative, not unique to the site and insufficient to outweigh the substantial, irreversible harm to the Green Belt. The LDO cannot lawfully be adopted based on the current evidence. 1.3 Significant Harm to Health and Environment Core Issue: The Environmental Statement (ES) and its technical appendices identify multiple significant, permanent and irreversible adverse impacts across landscape, ecology, air quality, noise, transport, health and climate. The scale and severity of these impacts make the LDO mechanism wholly inappropriate for this development. Key Environmental Concerns 1. Landscape and Visual Impacts The site is a high-sensitivity rural landscape, open and agricultural in character. The development will introduce large, visually prominent buildings, causing Major Adverse visual effects from multiple viewpoints. Mitigation measures (bunding, planting, screening) are inadequate and unproven, with planting taking decades years to mature: longer than the construction period itself. 2. Ecology and Biodiversity The true environmental and community value of a particular area is not limited to the boundaries of that area because wildlife does not respect human created boundaries. Rare or unusual species often needs to build up a reservoir population to survive long term and that population may rely on surrounding green areas to thrive, so the total ecology of a wider area needs to be considered. Ecosystems take many decades to evolve so the proposed Ecology Park is a very poor substitute for an established and complex fenland ecosystem. Any number of small disjointed artificial parks are a poor substitute for continuous swathe of green belt. The ecological evidence base offered in the consultation documents is incomplete and inconsistent; further surveys are required. Biodiversity Net Gain (BNG) is uncertain, relying on unverified assumptions, future habitat creation and off-site compensation. The development will also cause habitat fragmentation due to fencing, lighting, roads and security compounds. 3. Air Quality 286 oil powered generators will produce significant emissions, estimated to be several tonnes of nitrogen dioxide annually plus particulates, with over 8,000 operational hours per year for testing and maintenance. Emergency operation scenarios (up to 72 hours) and cumulative impacts are not included in the cumulative impact assessment. Construction emissions and dust are identified as impacts yet under-assessed, with inadequate modelling of cumulative impacts on residents and farms. The section 106 agreements allow for air quality offset payments – in effect allowing the developer to pay to pollute rather than invest in additional mitigation measures. Effective mitigation at source must be given very high priority first plus full transparency and legally binding guarantees before any payment is accepted. 4. Noise and Vibration Noise impacts are assessed as Moderate to Major Adverse, with long-term construction and operational noise affecting residents. Simultaneous generator testing, emergency operation and cumulative effects are not adequately addressed. 5. Water, Flooding and Drainage The development, including large areas of hardstanding, will require significant surface water management and alter runoff patterns, increasing downstream flood risk if the proposed mitigation measures fail due to inadequate long-term maintenance or are overloaded. No assessment is made of potential for upstream flooding to Upminster and Cranham if for any reason the Mardyke river flows are impeded or by the impact of increasingly frequency and severity of extreme weather.

		6. Climate Change Embodied carbon, generator emissions, construction emissions and operational energy use are not quantified. This is a major omission for a development of this scale. 7. Health and Wellbeing Adverse health impacts (mental wellbeing, stress from noise and traffic) are identified but not mitigated. The risk of Legionnaires disease from cooling systems has not been addressed. 8. Cumulative Impacts The ES fails to assess cumulative impacts with other regional developments adequately, underestimating the total environmental strain on human populations and ecosystems. 9. Construction Impacts The proposal has not adhered to the Green Construction Board carbon hierarchy PAS2080 which requires that alternative approaches be considered before building any new facility. Conclusion The environmental local impacts of the proposed LDO are: • Significant, long-term and irreversible • Under-assessed and inadequately mitigated • Incompatible with Green Belt policy • Inappropriate for an LDO mechanism The ES does not provide a robust or lawful basis for adopting the LDO. 1.4 Uncertain and Unassessed Infrastructure Core Issue: The proposed LDO would impose major, long-term and unassessed infrastructure burdens on Havering and neighbouring authorities. The evidence base reveals significant uncertainty, missing information and contradictions across power, transport, water, drainage and construction logistics assessments, making the LDO inappropriate and high-risk. Key Infrastructure Concerns 1. Power Infrastructure The development depends on unconsented, unassessed power infrastructure, including a new Warley GSP substation and undefined cable routes. Power availability is speculative, with no confirmed capacity or route, making the LDO's approval premature and risky. 2. Transport Infrastructure Fen Lane and B186 are unsuitable for the proposed traffic: thousands of HGV movements, abnormal loads and 17–20 years of construction traffic. Traffic modelling is incomplete, failing to assess cumulative impacts with other major developments e.g., Lower Thames Crossing, Brentwood Enterprise Park and several proposed housing developments nearby. Public transport links are not viable and the site is overwhelmingly car-dependent (80–90% private car use), contradicting London Plan policies for sustainable transport. The Travel Plan is aspirational, relying on unproven car-sharing, cycling and undefined shuttle bus routes. Yet cycling is deemed to be unsafe on rural roads and no off-road cycle route is proposed to nearby towns or railway stations. 3. Water Supply and Wastewater Annual water demand is up to 100 million litres, but supply is not confirmed and drought risks are not fully assessed. To supply such volumes Essex & Suffolk water will need additional, as yet unconsented, reservoir capacity in an already water-stressed region. Rainwater harvesting is stated by their own report to be unreliable and cumulative impacts with other regional developments are ignored. 4. Construction Logistics 17–20 years of construction is unprecedented for an LDO, causing prolonged disruption, noise, dust and emissions.

		Abnormal loads will require numerous road modifications, further straining rural infrastructure. Construction impacts (traffic, safety, road degradation) are not fully assessed. 6. Emergency Access and Safety Emergency access, fire risk and evacuation routes are excluded or not adequately assessed. This is especially relevant as construction work (inherently higher risk) will co-exist with operational buildings. Availability of adequate emergency response in view of the cumulative risks including other infrastructure projects are ignored. 7. Cumulative Infrastructure Strain The ES fails to assess cumulative impacts with other regional developments, underestimating the total strain on local infrastructure. Conclusion The infrastructure impacts of the proposed LDO are: • Significant and long-term • Under-assessed and dependent on unconsented infrastructure • Incompatible with rural road networks and unsafe • Inappropriate for an LDO mechanism The LDO does not provide a robust or lawful basis for approval based on the current evidence. 1.5 Conflict with National, Regional and Local Policy The proposed LDO conflicts with: • National Planning Policy Framework (Green Belt, climate, biodiversity) • London Plan policies on Green Belt protection, transport, climate change and healthy streets • Havering Local Plan policies on Green Belt, biodiversity, health and sustainable transport The evidence base does not demonstrate compliance with these policy frameworks and, in several cases, directly contradicts them. 1.6 Procedural or Evidence Weaknesses Expert judgement is always required in risk assessment but the rather opaque approach adopted here does not permit independent scrutiny of their findings. The scales used in the judgement process will undoubtedly include an element of subjectivity but should be published alongside the risk assessment to ensure transparency and increase public confidence in the output. The evidence base contains major procedural and methodological weaknesses: • Incomplete and contradictory • Procedurally and methodologically unsound, relying on unpublished risk assessment methodology • Reliant on unassessed infrastructure • Incompatible with the purpose of an LDO • Insufficient to justify Green Belt release • Inadequate to demonstrate Very Special Circumstances • Baseline surveys are incomplete. • The alternatives assessment is circular. The LDO cannot rationally be adopted based on this evidence. 1.6.1 Misuse of the Local Development Order Mechanism Local Development Orders are intended for simple, low-impact, predictable development. Thus the LDO mechanism is being misused for a development of national scale and complexity. This proposal is nationally significant in scale, highly complex and phased, environmentally contentious, dependent on unconsented and unassessed infrastructure and will cause long-term construction impacts lasting up to two decades Using an LDO in this context: • Severely limits democratic scrutiny especially given the short time for members of the public to examine the several thousand highly complex and fragmented documentation • Prevents meaningful site-specific assessment at later project stages • Removes the ability to reassess impacts as the scheme evolves over 20 years • Bypasses the safeguards inherent in a full planning application

		This represents a fundamental misapplication of the LDO mechanism. 1.7 Strategic Safety, Security and Resilience Risks Core Issue: While some of these concerns extend beyond Havering's statutory remit, they are material planning considerations due to their direct impact on: • Site suitability • Safety of residents and occupants • Resilience of critical national infrastructure (CNI) • Potential consequences of catastrophic failure Given the scale, concentration of infrastructure and proximity to high-risk assets, these risks must be addressed in the LDO process. Key Risks and Concerns 1. Proximity to High-Pressure Gas Transmission Pipeline The site is adjacent to a major high-pressure gas main of regional importance and crossed by high-voltage electricity grids. Exclusion zones (3m no-dig, 25m no-build) are described, but the LDO permits: • 17–20 years of heavy construction, risking ground compaction, vibration and surcharge loading. • Repeated contractor turnover, increasing the risk of pipeline damage over time • Co-location of construction activities with operational use Real-world evidence shows pipelines can be damaged even when following approved methods (e.g., near-miss with piling contractors) or without obvious reason (gas pipe rupture near Romsey, Hampshire). Organisational memory degradation over decades of construction could lead to safety constraints being forgotten or ignored, raising the risk of a national-level incident. 2. Concentration of Critical National Infrastructure The LDO would cluster 600MW electrical demand, 286 oil powered generators, 100 million litres annual water use and data connectivity through two closely located ducts. This creates a single point of catastrophic failure, with implications for: • Broader Strategic and National Security Implications • Regional energy security • National and Regional digital resilience • Emergency response capability • National CNI guidance Modern resilience planning favours distributed, redundant architectures: this proposal does the opposite. 3. Emergency Preparedness and Response Limitations The site's rural location, limited access routes and complex industrial layout present challenges for emergency response. A major incident could overwhelm local services and have regional implications, especially given the potential for simultaneous gas, power and IT failures. Conclusion The proposed LDO raises serious, unassessed strategic safety, security and resilience risks that are material to site suitability and the appropriateness of the LDO mechanism. A development of this scale, complexity and national significance requires: • Full, independent security and resilience assessment • Full planning application process, not an LDO • Wider scrutiny by the GLA, national bodies and resilience agencies The LDO process is being used to approve a development whose risks and implications extend far beyond a single borough's remit. 1.8 Global Context and Sustainability Issues In a world facing accelerating environmental, resource and geopolitical challenges, the decision to approve a 600MW, water-intensive, globally connected data centre campus on high-performing Green Belt land cannot be made through an LDO.

		It demonstrates that this development requires the highest level of scrutiny, not the lowest. Their claim that a 600 MW plant will help meet London's climate change targets by materially reduce greenhouse gases is untenable; the only guaranteed way to avoid its emissions is to cancel the project. We must all seriously question whether unlimited growth in data centre capacity is necessary, desirable, or indeed physically possible. The underlying assumption upon which extra IT infrastructure are justified seems to be that they generate additional economic activity. This may be the case, but here the principle economic benefits will go to US-based IT corporations as the UK companies will have to pay to use this AI capability. The risk is that our dependency on foreign US corporations and potentially the whim of US presidents, increases our vulnerability as a nation. The "economy" is often defined in the narrow sense of how much profit can be made by a few large corporations but a rebalancing of the "economy" focussing on local businesses and the common prosperity of society in general is necessary if we are serious about limiting the devastating effects of climate change on future generations. AI-generated "growth" also causes negative growth when the total burdens on society are taken into consideration, for example, air pollution, noise, destruction of pristine environmental habitats, loss of biodiversity etc. If we truly care about the future of our children, aggressive and sustained mitigation of environmental damage is urgently required to help meet legally binding targets for the UK to reduce it's dependency on fossil fuels. This consultation completely ignores the fundamental need to consider this proposed development in a wider context and as part of a UK-wide integrated IT strategy. 1.9 Due Diligence Given the scale of the proposal and the fact that it would be one of the largest data-centre developments in the UK, it is reasonable to ask the Council to demonstrate that appropriate due-diligence has been undertaken on the developer, Digital Reef. Ensuring these concerns have been addressed would help reassure communities and protect both the Council and local residents against potential liabilities and loss of credibility: 1. Have beneficial-ownership checks have been carried out on Digital Reef and its many associated entities. 2. Have checks been done for potential money laundering (a known issue in major infrastructure projects globally) and is LBH satisfied that suitable assurances has been given that effective financial governance processes are in place. 3. What safeguards or conditions do LBH intend to apply to ensure: • Transparency of ownership over the lifetime of the development? • Robust tenant-screening and illicit-use prevention? [Relevant reference: https://www.datacenterdynamics.com/en/news/18-data-centers-shut-down-in-sweden-for-illegal-cryptomining/] • Protection of LBH and the community from stranded-asset or partial-build risks? • What measures of Environmental, Social and Governance (ESG, standard measures of a company's sustainability and ethical impact) have been given and are these ESG or "green" claims independently verified? 1.10 Transparency and Public Scrutiny This objection highlights a fundamental flaw in the planning approach: treating a 20-year Green Belt development as a one-time, irreversible decision made by a small group of remote specialists. Risk management and planning decisions should begin with true consultation and evolve with technological, economic, and regulatory changes, not be set in stone without ongoing review. Without regular reassessment and stakeholder input, decisions risk becoming outdated, ineffective, or unfair. The approach adopted for this project clearly fails the Gunning Principles, which set the legal standard for fair UK public consultations, requiring consultation at the formative stage (not finalised decisions), sufficient information for informed responses, adequate time (typically 12 weeks) for review and conscientious consideration of feedback. 1.11 Conclusion The proposed LDO is severely flawed, unlawful in several aspects and must be rejected for the reasons documented here. A full planning application: with rigorous, transparent assessment and public scrutiny is the

		only acceptable path forward. A more detailed review of the documentation is presented in Section 2 below. 2 Review Detail 2.1 GREEN BELT HARM The proposed LDO would irreparably damage 218 hectares of high-performing Green Belt for the construction of a 400,000 m^2 data centre campus, with buildings up to 35 metres high, extensive hardstanding, security fencing, substations, compounds and a 17-20-year construction programme. The evidence base demonstrates that the site performs strongly against Green Belt purposes and cannot be categorised as “grey belt”. The harm to the Green Belt would be substantial, permanent and irreversible. 2.1.1 Analysis of why the LDO fails Green Belt policy. NPPF Chapter 13 is clear that inappropriate development is harmful to the Green Belt and should not be approved except in very special circumstances. However, the Council’s own evidence (APPENDIX 11 – Green Belt Assessment Report.pdf and Statement of Reason (SoR)) confirms the site is high-performing Green Belt, not “grey belt” which is a direct conflict with NPPF policy which requires: • a robust alternatives assessment which is inadequate • consideration of brownfield land • minimisation of Green Belt harm The NPPF requires assessment of both spatial and visual openness. 2.1.1.1 Spatial harm The proposal includes introduces industrial-scale buildings: • 340,000 m^2 of data halls • 50,000 m^2 of indoor horticulture • 17 years of construction compounds • 286 generators • 35 m-high buildings • Security fencing, substations, access roads and hardstanding This is a complete transformation of open countryside into a large industrial estate and by severely damaging the landscape effectively opens the area to further industrialisation. 2.1.1.2 Openness and Visual harm 218 hectares of inappropriate development causes substantial harm to openness. Technical Appendix 15.2 – Daytime Visual Assessment.pdf identifies multiple Major Adverse (significant) visual effects from Viewpoints 1, 2, 3, 4, 5 and 7 • “The development would introduce large, visually prominent buildings into an otherwise open rural landscape” The site is wholly open and rural in character and the GBA Report describes the site as: • GBA P3 s2.7 "The site..... is free from any notable areas of built development and, consequently, is wholly open. There are no notable existing urbanising influences within the immediate vicinity of the site.” The Statement of Reasons repeatedly states harm to openness confirming its green belt status. • SoR 16.17 The development would have an urbanising influence on the Green Belt resulting in a loss of openness. This harm is attributed substantial weight. • SoR 3.11 When considering planning applications, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness. • SoR 12.33 In addition to the identified harm to green belt purposes, LUC also concluded that there would be a loss of openness following the proposed development. Build Zones A-G have little space between them and that space would make no significant contribution to the openness of adjacent Green Belt land, rather it would have an urbanising influence on it. • SoR 12.39 The development is however inappropriate development and causes harm to green belt purposes and openness. Paragraph 153 of the NPPF makes it clear that local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its

		openness. • SoR 13.5 The development of data centres and ancillary infrastructure would have an urbanising influence on the Green Belt resulting in a loss of openness and harm to the purposes of including land within the Green Belt. This harm is attributed substantial weight in accordance with the NPPF. • SoR 13.11 The proposals will give rise to harm to green belt openness and purposes, as described above. Harm arises in policy terms as the development is inappropriate development in the green belt, which is by definition harmful. Substantial weight is given to these elements of green belt harm, as required by NPPF para.153. Thus according to the projects own documentation, the development would cause substantial harm to openness 2.1.1.3 Green belt vs Grey Belt The site performs strongly against Green Belt purposes GBA Stage 1 assessment concludes that the site: • “makes a strong contribution to Purpose C“(safeguarding the countryside from encroachment) (p.21) • “forms part of the strategic gap between settlements” (p.22) • “is not influenced by urbanising features” (p.23) Thus, the site cannot be considered “grey belt” under the NPPF because it does strongly contribute to Green Belt purposes. It is very clear from the above hat the site does NOT meet the NPPF definition of “grey belt” LDO Statement of Reasons.pdf • SoR p43 “12.32 As the site makes a very strong contribution to purpose (a), it does not meet the definition of grey belt land. The proposed development is therefore inappropriate development in the Green Belt under the terms of the NPPF and therefore it must be demonstrated that very special circumstances exist for the scheme to be permitted” • SoR p59 “13.1 The LDO site does not constitute grey belt and therefore the proposed development would comprise inappropriate development in the Green Belt." 2.1.1.4 The development would cause encroachment and urbanisation The GBA report states: • “The site is rural in character and free from urbanising influences” (APPENDIX 11, p.4) Yet the proposal introduces: • industrial-scale buildings, substations • security fencing, lighting columns • internal roads, car parks, HGV yards, compounds • a 17-20-year construction programme This is surely the textbook definition of encroachment and the development would severely undermine the strategic gap between settlements. (APPENDIX 11, p.22) the site • “forms part of the gap between North Ockendon, South Ockendon, Basildon and Upminster” The development would thus: • erode the separation between settlements • introduce urbanising mass into the gap • weaken the Green Belt’s ability to prevent merging GBA states regarding loss of visual separation • 3.54 ‘Loss’ is interpreted as a ‘significant reduction’ in visual separation, rather than its complete removal. Typically, the development of a substantial part of a gap has the potential to equate to a significant loss of visual separation" The panoramic photo in Section 1 above with accompanying artists impression of the data centre illustrates clearly the openness of the site and the very clear visual harm and highly significant reduction in gap thus created. The combined effects from The Bulphan Solar Farm, The Lower Thames Crossing, Codham Hall/J29 Industrial Area, Battery Energy Storage in St Marys Lane, 580 new homes south of West Horndon, a new town of 3700

		homes plus all the associated community facilities at Dunton Hills and proposed new homes south of Bulphan will essentially urbanise the already narrow strip of green belt between the eastern edge of Cranham and Laindon (Ref Technical Appendix to Chapter 5 - 5.4 Cumulative Schemes.pdf) The GBA p25 s4.32 dismisses this argument of the basis that the small area of woodland at the edge of Cranham urban area acts as a separating feature: • "woodland at Cranham's urban edge and the M25 represents strong separating features within the borough." This argument is utterly ridiculous: - which is effectively saying that a small patch of trees makes it acceptable to build an industrial monstrosity in a rural setting. The summary of impact in the GBA s4.33 is completely contradictory; on the one hand it says: • "this general loss of openness combined with the loss of very strongly contributing Green Belt land can be attributed to result in a Very Strong impact on the Green Belt designation. " But then says the urbanising effect of this monstrous development • "would not be extensive" because of the proposed mounding and tree planting around the datacentre would screen it." I seriously doubt that even the fastest growing trees would provide any significant degree of shielding for at least 50 years. In yet another ridiculous argument the GBA report and repeated in the SoR p5 s1.8 even suggests that the mitigation proposals could • "positively enhance the beneficial uses of certain areas of Green Belt in the Borough". How anyone can suggest that a small artificial "ecology park" can offset a massive industrial park and enhance the Green Belt is beyond my comprehension. This is a direct conflict with Green Belt Purpose B (Prevent neighbouring towns merging into one another). The landscape character harm is significant and long-term. The Technical Appendix 15.1 – Landscape Scoping and Sensitivity.pdf, identifies • "High sensitivity receptors, • Open, rural landscape with strong agricultural character "(p.8) The Technical Appendix 15.2 – Daytime Visual Assessment.pdf identifies • numerous moderate to major adverse effects that are permanent and long-term This is completely incompatible with Green Belt protection. The Statement of Reasons (SoR) p15, s3 selectively quotes the NPPF, the London Plan 2021 and the Havering Local Plan 2026-2031 regarding the importance and purpose of Green Belt and green spaces yet misrepresents the NPPF as giving the development carte blanche to override Green Belt policy "Paragraph 52 of the NPPF encourages the use of LDOs to set the planning framework for particular categories of development where the impacts would be acceptable and in particular where this would promote economic, social or environmental gains for the area. " The scale of harm is incompatible with a LDO approach which is intended for low-impact, small-scale and non-controversial development yet this proposal is the complete opposite of that: • billed as the largest data centre campus in the UK and possibly Europe • a 17–20-year construction project • a complete transformation of 218 ha of Green Belt • with significant adverse effects across multiple receptors The scale of harm is fundamentally incompatible with the LDO mechanism. 2.1.2 Green Belt Harm-Conclusion The Green Belt harm arising from the proposed LDO is substantial, permanent and irreversible. The Council's own evidence base confirms that the site is high-performing Green Belt, not grey belt and that the development would cause significant adverse effects on openness, landscape and the strategic gap between settlements. The LDO cannot be justified on Green Belt grounds. 2.2 FAILURE TO DEMONSTRATE VERY SPECIAL CIRCUMSTANCES (VSC) The National Planning Policy Framework (NPPF) is unequivocal: • Development in the Green Belt is harmful by definition and should not be approved except in Very

		Special Circumstances. To satisfy the VSC test, the applicant must demonstrate that: • The harm to the Green Belt is clearly outweighed by other considerations and • Those considerations are truly “very special” unique, site-specific and compelling. It is very clear to me that the proposed LDO fails this test. The claimed benefits are speculative, unquantified, contradictory and in many cases dependent on infrastructure that does not exist. 2.2.1 Key reasons why the VSC case collapses. APPENDIX 5 - Statement of Reasons.pdf notes the substantial arguments for protecting Green Belt but then proceeds to dismiss these on very spurious grounds (my emphasis with [#] refences to counter-arguments below): “13.16 Given the substantial positive weight attached to direct and indirect employment [1]generation, need[2], economic benefits[3], and the lack of alternative sites[4], the significant positive weight attached to social benefits[5] including the visitor’s centre, the significant positive benefit attached to environmental benefits including BNG[6], and the delivery of the Ecology Park and the moderate positive weight attached to employment and training, the absence of a plan-led solution [7] and the contributions towards enhancement of the Green Belt[8], when taken together clearly outweigh the harms identified including that to the Green Belt which is attributed substantial weight.” 1. Employment creation is low priority in an area of already low unemployment 2. Need, as addressed below, is speculative 3. Economic benefits to Havering are low with most of the profit generated by remote corporations 4. The supposed lack of alternative sites is artificially constrained by choosing such a massive development. A series of interconnected small sites could be easily accommodated by small brownfield sites 5. The visitors centre is cited as a social benefit but there are ample well-established visitors centres in Havering such as those Thames Chase and Ingrebourne Valley plus the one being created in Hole Farm 6. The claim of BNG or any net environmental benefits from this monstrous development is really an oxymoron and I strongly dispute such claims 7. What possible relevance does “the absence of a plan-led solution” have 8. How any rational person can claim that such a monstrosity contributes “towards enhancement of the Green Belt” is beyond my comprehension. APPENDIX 12 – Need Assessment.pdf is speculative, unquantified and internally contradictory and relies heavily on: • global data centre market forecasts • generic UK digital infrastructure trends • assumptions about AI and cloud growth • industry commentary rather than site-specific evidence There is no quantified need for this scale of development and the Needs Assessment does not demonstrate: • why 340,000 m^2 of data halls are required • why this site is essential • why 17-10 years of construction is justified • why multiple smaller sites could not meet the same need • why existing brownfield sites were excluded The document repeatedly uses vague language relying on anticipated demand, expected growth, market interest, and potential future requirements. None of these meet the evidential threshold for VSC. ES Chapter 3 – Need and Alternatives.pdf relies heavily on commercial considerations but this is a circular argument: • The developer wants this site so therefore this site is needed That is not a Very Special Circumstance. 2.2.1.1 The Power Availability

		The APPENDIX 13 – Power Availability Report.pdf again assumes about the over-riding need for the EHDC to be within the "London Cloud Region" so artificially constrains the analysis. Also, the assumption that the EHDC must be the massive size proposed and need to consume 600MW power is also not challenged. A network of smaller data centres spread around the region or across the UK is perfectly feasible and could be located near renewable power sources as well as providing much greater resilience than a single huge facility prone to single mode failures. The scheme depends on promises of as yet unconsented infrastructure such as a new Warley GSP substation • the cable route is not fixed • the route may run outside the LDO boundary • land west of the corridor has not been surveyed ES Chapter 5 ES Chapter 5 – EIA Process and Methodology.pdf (my emphasis): • "5.24 The Power Cable Routing area was identified originally following discussions with Digital Reef, who in turn had discussions with UKPN. Since those discussions took place, it has been identified that a new substation is to be delivered by National Grid Electricity Transmission (NGET) at Warley. The introduction of a new GSP substation may have implications for the final cable routing, including the potential for the cable route to be located, in whole or in part, outside the Power Cable Routing area and thus outside the LDO boundary, on land located to the west of this area (as presented in Figure 5.1). The potential for the anticipated cable routing location to change arose after the completion of baseline surveys carried out for the purposes of the EIA. Site specific surveys of the land to the west of the Power Cable Routing area have not been undertaken and, as a result, assessments of the potential effects of cable routing within this land, based on site specific survey information, has not been undertaken." This means the LDO is being asked to approve a development without confirmed power infrastructure. A VSC case cannot rely on uncertain, unconsented, or unassessed infrastructure. 2.2.1.2 The Sites Assessment artificially constrains alternatives The APPENDIX 14 – Sites Assessment.pdf is deeply flawed as the search criteria are self fulfilling. The assessment requires: • a single site of 200+ hectares in East London • with grid connection potential and developer interest These criteria guarantee that only the applicant's preferred site will pass. • Brownfield and industrial land are dismissed without proper assessment, but • The scale of development is self-selected by the applicant. • Claimed economic benefits are unquantified and speculative The Statement of Reasons claims job creation, economic uplift, digital infrastructure benefits and supply chain opportunities. Yet none of these are quantified, guaranteed, secured by condition, unique to this site or proportionate to the Green Belt harm. Job numbers are also vague and inconsistent across the documents, but the ES admits: "Operational employment is expected to be low relative to the scale of development" (ES NTS, p.12) • Data centres are not major job creators. • Economic benefits are not unique to this site Data centres can be built: • on brownfield land • in industrial areas • in existing tech clusters • in areas with existing grid capacity There is nothing "very special" about building them on Green Belt. 2.2.1.3 Claimed sustainability benefits are contradicted by the evidence The applicant claims waste heat reuse projected for 2045 yet no firm proposals have been advanced just "will be explored" and the offsite network is at this stage is just "hypothetical" (p25 APPENDIX 15_ Energy and Sustainability Statement .pdf) Details of renewable energy supply integration are sparse and claims of biodiversity net gain from the project

		are highly unlikely given the huge power and infrastructure footprint. The greenhouse scheme, is a desirable use of waste heat, but will only use 2% of the heat produced and replaces already productive agricultural land. Demand for the heat will be highest in the cooler seasons so large quantities of water will still be required for cooling in the drier summer months. Claims are made of low-carbon design ignores the massive overall carbon footprint of the project. There is also a risk that, having invested heavily in district heating and caused considerable disruption during the installation of pipelines via local roads, the business ceases to trade, utilisation of data centres reduces dramatically or innovative technology such as optical computing becomes available that generates far less heat. The greenhouse facility would cease to be viable and those homes that converted to distributed heating at great cost would be left with no heat source. To facilitate such a scheme requires longstanding, multi-decade, commitment to heat supply, financially backed by both LBH and Digital Reef. The report explores the feasibility of piping the waste heat as far as away as Queens Hospital and Rainham but does not assess the massive disruption that laying such pipes along all the local roads and into homes and public buildings. The report shows a picture of a typical piping installation.  Fig.16 Example of pre-insulated pipework at SmartParc 7.2 Offsite Network As the offsite network is at this stage hypothetical this report aims to define an offtaker of the size and scale which could potentially utilise the maximum quantity of waste heat from the data centre 2.2.1.4 Biodiversity Net Gain is uncertain and not VSC The APPENDIX 24 – Biodiversity Net Gain Assessment.pdf relies on: • unverified baseline data • future habitat creation • long-term management assumptions • off-site compensation 2.2.1.5 Oil powered generators undermine sustainability claims The Technical Appendix 14.2 – Generator Emissions Data Design Note.pdf states: • “Operation of the generators is likely to be limited to testing and maintenance only” (p.4) However this statement downplays the real situation: • 286 generators on weekly, monthly and annual test cycles equates to over 8000 operational hours per year, using several tonnes of fuel annually • Hydrotreated vegetable oil is proposed as the fuel but as highly sustainable sources such as waste fat are in short supply, it is highly likely that oils sourced from tropical rain forests such as palm oil will be used • Emergency operation scenarios would potentially require up to 72 hours operation • Cumulative emissions of several tonnes of nitrogen oxide pollutants per year • Air quality impacts on nearby residents have not been not adequately assessed as key reports such as dispersion modelling of pollutants have not been released. These are not compatible with a “sustainable” development.

		2.2.1.6 The so called "benefits" do not outweigh substantial Green Belt harm To meet the VSC test, benefits must: • be certain, not speculative • be unique to the site • be proportionate to the harm • clearly outweigh the Green Belt harm VSC test is not met because • the harm is substantial • the benefits are speculative • the alternatives are not properly assessed • the power infrastructure is uncertain • the economic case is weak • the environmental impacts are significant 2.2.2 North Ockendon Conservation area Part of North Ockendon is a Conservation Area so the plan to build an industrial site next door is totally contradictory to the aims of conservation areas. 2.2.3 Very Special Circumstances - Conclusion The applicant has not demonstrated Very Special Circumstances. The claimed benefits are speculative, unquantified, contradictory, dependent on unconsented infrastructure, not unique to this site and insufficient to outweigh the substantial Green Belt harm. The LDO cannot lawfully be adopted based on this evidence. 2.3 ENVIRONMENTAL AND HEALTH IMPACTS The Environmental Statement (ES) and its technical appendices identify multiple significant adverse impacts across landscape, ecology, air quality, noise, transport, health and climate. Many of these impacts are assessed as Moderate to Major Adverse, meaning they are significant in EIA terms. Several impacts are permanent, long-term, or irreversible. The LDO mechanism is inappropriate for a development with this scale and severity of environmental harm. The key environmental concerns are: 2.3.1 Landscape and Visual Impacts The landscape evidence is damaging to the applicant's case as the site is a high-sensitivity rural landscape. Technical Appendix 15.1 – Landscape Scoping and Sensitivity.pdf states: • "The landscape is open, rural and agricultural in character" (p.8) • "Receptors are of high sensitivity" (p.12) This contradicts the Statement of Reasons, which attempts to downplay the site's sensitivity. The development causes significant adverse visual effects. Technical Appendix 15.2 (TA15.2) Daytime Visual Assessment.pdf concludes: • Major Adverse (significant) visual effects from viewpoints 1, 2, 3, 4, 5 and 7 • "The development would introduce large, visually prominent buildings into an otherwise open rural landscape" These effects are permanent, long-term and significant, thus completely incompatible with Green Belt protection. Mitigation is inadequate and unproven relying heavily on bunding, planting, screening and "Green infrastructure corridors". TA 15.2 acknowledges that "Mitigation planting will take 15–20 years to mature" meaning the harm persists for most of the 17-year construction period. However, I dispute that even after 20 years that this so-called mitigation will be effective in screening such a monstrous structure. 2.3.2 Ecology and Biodiversity The ecological evidence base is incomplete, inconsistent and in several cases misleading. The site contains valuable habitats identified in ES Chapter 11 Ecology.pdf so is not low ecological value, as implied in the Statement of Reasons. There is also a comment that "Further surveys are required", which is a major procedural flaw as an LDO should not be adopted when baseline ecological data is incomplete. Biodiversity Net Gain (BNG) is uncertain and relies on unverified assumptions so used to justify Green Belt

harm
APPENDIX 24 – Biodiversity Net Gain Assessment (Main Report).pdf relies on:
• Future habitat creation and long-term management which may degrade in time
• Off-site compensation
• Optimistic assumptions about habitat success
2.3.3 Ecological fragmentation
The development introduces fencing, lighting, internal roads, security compounds, substations etc that create barriers to wildlife movement hence Habitat fragmentation is likely. It is well established that excessive artificial lighting has profound negative effects on wildlife.
2.3.4 Air Quality
The air quality evidence is particularly concerning due to the scale of 286 oil powered generators
The Technical Appendix 14.2 – Generator Emissions Data Design Note.pdf states:
"Operation of the generators is likely to be limited to testing and maintenance only" but neglects to mention that this testing amounts to over 8000 hours of testing and excludes emergency operation scenarios (up to 72 hours).
This table shows the nitrogen oxides emitted during the 25% and 100% test loads and relates it to the number of Euro6 compliant cars idling in the vicinity (which emit about 3-6g NOx per hour depending on car type - Ref: https://www.trl.co.uk/uploads/trl/documents/PPR987-TRL-Idling-Analysis-Summary.pdf)

	g/sec	g/hour	Equivalent number of Idling Cars from a single Generator
NOx Emission Rate (25% load) [g/s] time weighted	0.38	1,368	228 - 456 cars
NOx Emission Rate (100% load) gram per second - time weighted	2.18	7,848	1308 - 2616 cars
All generators running at 100% load at highest SCR efficiency if grid power cut		**251,222**	41,800 to 83,700 cars

One or two generators will need to be in operation at all times between 0700 and 2300 to achieve the required test schedule which is equivalent to between about 200 up to 2600 stationary cars with idling engines (depending on car type). All generators at 100% load equates to about 42,000 to 84,000 cars idling.
For Heavy Duty diesel engines, an ammonia (NH3) concentration limit of 10 ppm applies to diesel to control ammonia release from Selective Catalytic Reduction systems used to control NOx emissions. Ammonia concentrations have not been stated in the consultation documents.
The ES does not assess:
• Worst-case emergency operation
• Effects cumulative generator operation and maintenance on human or ecological receptors
• Climate impacts of oil combustion
• Construction emissions are under-assessed

The APPENDIX 1e – Code of Construction Practice LDO Appendix 4.pdf acknowledges, significant construction traffic movements and dust generating activities but the ES does not model
• Cumulative dust impacts
• HGV emissions on Fen Lane
• Impacts on nearby residents and farms
ES Chapter 16 Cumulative Effects.pdf states that effects have not been reported so professional judgement is used:
"16.14 In respect of air quality, where scales of effects have not been reported (in accordance with topic specific, published assessment guidance), the specialists have applied their professional judgement to derive scales which have been applied in this assessment."
Expert judgement is always required in risk assessment but the rather opaque approach adopted here does not permit independent scrutiny of their findings. The scales used in the judgement process will undoubtedly

		include an element of subjectivity but should be published alongside the risk assessment to ensure transparency and increase public confidence in the output. 2.3.4.1 Air Quality Offset Payments The conditions for the data centre (Draft Heads of Terms for S106 agreement.pdf) allow polluters to pay compensation for pollution. The technical term is "Air-quality offset payments" but this can become a licence to avoid proper pollution control and fail to protect local health, mask design failures, and shift responsibility onto the public purse. Offsets should be a last resort, not a substitute for mitigation. Relying on payments lets developers avoid stronger onsite measures and perpetuates local pollution hotspots. Monetary compensation cannot restore local air quality damaged by the data centre and raises the question: how much value do you place on the health of people and the environment (nitrogen oxides are particularly damaging to children's lungs)?. There are lots of issues with this approach, such as how will the pollutants be measured, who decides whether no further controls can be applied to the data centre. The developer might just decide that it is cheaper to pollute than to add extra pollution control devices. Offsets are not meant to be a get-out-of-pollution-control card. Effective mitigation at source must be given very high priority first plus full transparency and legally binding guarantees before any payment is accepted. This is very concerning as: • Offsets should be a last resort, not a substitute for avoidance and reduction • The developers may find it cheaper to pollute than to pay for pollution controls • Monetary offsets cannot remove local NOx/PM hotspots or protect nearby residents from exposure. • The clause leaves open important details: how “cannot be mitigated” is judged, who agrees the damage cost, how funds are ring-fenced, and how success of funded measures is measured. • The extract references pollutant tonnes but also mentions “tonnes of carbon dioxide/annum” . Whilst CO2 is a general concern for climate change I am also concerned in this context about nitrogen oxides and particulates that cause harm to local people and ecosystems • That mix of pollutants and units must be clarified to avoid flawed calculations • Offsetting a single development does not address cumulative emissions from multiple projects in the area. • The compensation will only last 30 years but should be for the lifetime of the project The Section 106 Agreement should demand • Full Air Quality Neutral Assessment including baseline pollutant monitoring and dispersion modelling (NOx, PM2.5) with maps of receptor impacts. • Funding of a DEFRA standard air quality monitoring station at a site to be agreed with independent air quality experts • Clear evidence that all feasible onsite and offsite mitigation has been exhausted before any offset is considered. • Transparent offset methodology: formula, damage cost source, uplift, and worked examples. • Legal mechanism and monitoring: how funds are spent, and how outcomes are audited. • Local health and cumulative impact assessment showing the development will not create or worsen pollution hotspots • This condition should apply for the operational lifetime of the facility, not just 30 years Without robust mitigation, transparent calculations, and legally binding guarantees on how offsets are used and monitored, the provision risks becoming a way to monetise rather than prevent pollution. 2.3.5 Noise and Vibration Noise impacts assessed as Moderate Adverse during the 17–20-year construction period and long-term operation which is not appropriate for an LDO. Generator testing assumes that testing will be limited to short periods but with the combined maintenance testing requirement of over 8000 hours per year probably two generators will be in operation during the daytime. It does not give adequate attention to:

		• Simultaneous testing of generators • Emergency operation of up the 72 hours continuously • Tonal /low-frequency noise which is not always accounted for in simple decibel levels • Cumulative effects on health from multiple sources such as increased traffic 2.3.6 Transport and Accessibility The transport evidence is weak, contradictory and incomplete. Fen Lane and B186 are unsuitable for HGV traffic. ES Chapter 8 – Transport and Accessibility.pdf acknowledges: “Narrow rural roads” and “Limited passing opportunities” yet the ES proposes: • Thousands of HGV movements • Construction traffic for 17-20 years • Abnormal loads • Workforce traffic Traffic modelling is incomplete because the ES does not assess: • Cumulative impacts with Lower Thames Crossing and other nearby developments • Brentwood Enterprise Park • Warley GSP construction • Seasonal agricultural traffic • School traffic The Travel Plan is aspirational. APPENDIX 3 – Draft Travel Plan.pdf relies on car-sharing, cycling and shuttle buses, but: • It admits that cycling is unlikely to appeal on heavily trafficked rural roads • Shuttle routes are undefined • Modal shift assumptions are unproven • Some cycle paths are provided within the site, but no attempt is made to create cycle routes designed to national standards to key public transport hubs such as Upminster, West Horndon and South Ockendon • The London Borough is remiss in this respect as could insist that this would be a section 106 commitment from the developers 2.3.7 Water, Flooding and Drainage The Flood Risk Assessment and ES acknowledge: • “Surface water management will require significant intervention” (ES NTS, p.18) • “Large areas of hardstanding will alter runoff patterns” This increases flood risk downstream. No assessment is made of potential for flow in the Mardyke to be impeded causing upstream flooding in case of adverse weather. Flood risk projections are typically based on probabilistic 100-year floods, but experts are warning that these projections are rapidly becoming invalid as recent events in the UK and worldwide have amply demonstrated. It is quite possible that “100 year” events will become commonplace and truly catastrophic 500- or 1000-year events will become a distinct possibility for which any new project should be designed to cope with. 2.3.8 Climate Change The ES does not quantify: • Embodied carbon • Generator emissions • Construction emissions • Grid reinforcement emissions • Operational energy use This is a major omission for a development of this scale. The claim in APPENDIX 15 Energy and Sustainability Statement is astonishingly misleading: their assertion that a 600 MW facility “can address Policy SI 2 of the London Plan … to minimise greenhouse gas emissions by 35%” (achieving “~40% reduction through efficient design”) is, at best, a superficial framing of marginal gains. How can a 600Mega Watt facility plausibly be presented as a meaningful contribution to decarbonisation when

		the most effective way to avoid the emissions it will generate is not to build it in the first place. 2.3.9 Health and Wellbeing In the 'Public reports pack 03032026 1900 Strategic Planning Committee.pdf' and APPENDIX 7 – Health Impact Assessment.pdf (similar document but there are mismatches between them) highlights many issues that will have a significant effect on public and ecosystem health and downplays the risk for many others, for example: • "Potential adverse impacts on mental wellbeing due to construction duration" • "Potential for increased stress due to noise and traffic" These impacts are not mitigated and will extend beyond the construction period. Very little mention is made across the project documentation of the risk of Legionnaires' disease from cooling systems. These systems typically create can warm, aerated water conditions that allow Legionella bacteria to thrive, creating contaminated water droplets (aerosols) that can be inhaled by employees or spread over several kilometres. Individuals with weakened immune systems, the elderly, and those with chronic health conditions are most susceptible to Legionella bacteria. Thus the residents of the care home in Fen Lane may be at increased risk. Water cooling systems, including the hybrid adiabatic type proposed use a combination of dry and evaporative cooling technology typically require regular dosing with chemicals to prevent build-up of bacterial growth in the system. These systems also build up sludge so need periodic cleaning. No mention is made of the prevention measures to reduce this risk including how chemically contaminated wastes will be disposed of. No mention is made of the coolant fluid used for the chilling loop but this potentially contains hazardous chemicals so this risk should be addressed. 2.3.10 Cumulative Impacts The ES fails to assess cumulative impacts with: • Lower Thames Crossing • Warley Grid upgrades • Brentwood Enterprise Park • Other developments including data centre proposals in the region 2.3.11 Environmental Impacts - Conclusion The environmental impacts of the proposed LDO are wide ranging: • Significant, long-term/permanent and irreversible • Under-assessed and inadequately mitigated • Incompatible with Green Belt policy • Inappropriate for an LDO mechanism Thus, I believe that the ES does not provide a robust or lawful basis for adopting the LDO. 2.4 INFRASTRUCTURE IMPACTS The proposed LDO would impose major, long-term and in several cases unassessed infrastructure burdens on Havering and neighbouring authorities. The evidence base reveals significant uncertainty, missing information and contradictions across the power, transport, water, drainage and construction logistics assessments. 2.4.1 Power Infrastructure As noted above, this development depends on unconsented, unassessed and uncertain power infrastructure so the LDO is being asked to approve a development based on speculative power availability, vague or incomplete impact assessment 2.4.2 Transport Infrastructure Transport impacts are significant, long-term and in several cases under-assessed. Fen Lane and B186 are clearly unsuitable for HGV traffic. ES Chapter 8 – Transport and Accessibility.pdf acknowledges: "Narrow rural roads" and "Limited passing opportunities" yet the ES proposes: • Thousands of HGV movements • Abnormal loads • Construction traffic for 17-20 years

		• Workforce traffic • Deliveries for 340,000 m^2 of data halls This is completely incompatible with the rural road network. Traffic modelling is incomplete and unrealistic and does not assess: • Cumulative impacts with Lower Thames Crossing • Brentwood Enterprise Park • Warley GSP construction • Seasonal agricultural traffic • School traffic • Emergency diversions • Peak-hour congestion on the A127 and M25 The modelling relies on: • Optimistic modal shift assumptions • Unproven shuttle bus proposals • Unrealistic cycling assumptions The Draft Travel Plan and Transport Assessment (TA) is aspirational, not deliverable. The APPENDIX 3 – Draft Travel Plan.pdf relies on car-sharing, cycling, shuttle buses and travel behaviour change, But admits • Cycling is perceived to be unsafe on rural roads (Note: made busier by 20 years of construction traffic) see 2.4.3 below • Shuttle routes are undefined • Modal shift assumptions are untested • No binding commitments are made • No additional lighting on rural roads This is not a credible mitigation strategy. 2.4.3 Walking & Cycling APPENDIX 7 - Health Impact Assessment.pdf suggests that people might enjoy cycling in the Ecology park but the project does not provide off-road links to local centres of population so presumably assumes that people will drive to the Ecology park with a bike in their car- which conflicts with statements elsewhere about sustainability. “People feel safe: Dedicated accesses and internal routes for people walking and cycling would provide segregation from motorised traffic. Suitable lighting on walk/cycle and vehicle routes within the site, including the walk/cycle route connecting to Ockendon Road, would be provided to increase sense of safety.” Yet the Transport Assessment (TA) shows the site is fundamentally inaccessible and the TA repeatedly acknowledges that walking and cycling are not viable modes for staff or visitors. Relevant extracts: • “The distances to nearby residential areas and the lack of continuous footway provision… means use of walking as a main mode is likely to be very low.” (TA p.89) • “People are not likely to feel safe or relaxed walking/cycling on Fen Lane during the hours of darkness.” (TA p.87) • “There is no street lighting… no footways… very low number of people walking… sense of isolation.” (TA p.87) The TA itself confirms that the site is inherently hostile to walking and cycling, with no continuous footways, no lighting and rural lanes that are unsafe in darkness. The TA concedes that walking and cycling will be “very low” and that users “are not likely to feel safe or relaxed” on Fen Lane or Ockendon Road. This directly contradicts London Plan Policy T2 and T5, which require developments to enable active travel, not merely acknowledge its impossibility. Electrically powered bicycles are already becoming commonplace and give employees and visitors the option of leaving their car at home. These are likely to be even more popular by the projected completion date of the data centre and demand for low-traffic routes is likely to increase considerably. The economic and environmental cost of providing cycle facilities is tiny compared to major infrastructure such as the data centre.

		Our current road infrastructure is poorly maintained, for example, the numerous potholes which create a real danger to cyclists and pedestrians as well as serious damage to motor vehicle tyres and suspensions. This development will further increase this damage to roads due to heavy vehicles and general traffic volumes. This contradicts the NPPF Chapter 9 para 117 (quoted in the Draft Travel Plan.pdf), which require developments to enable active travel: The National Planning Policy Framework (NPPF)3 sets out the Government's planning policies. The NPPF constitutes guidance for local planning authorities and decision-makers both in drawing up plans and as a material consideration in determining applications. Chapter 9 of NPPF relates to promoting sustainable transport. Paragraph 117 states "applications for development should: a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use; b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport; c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards Any new cycling facilities should follow Government Guidance on Cycle Infrastructure Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk) 2.4.4 Public Transport TA confirms the site is not served by viable public transport: The only bus service currently is the 370, running on Ockendon Road but the TA admits that no one can realistically walk to the bus stops in darkness or poor weather and are not likely to feel safe or relaxed walking/cycling on Fen Lane during the hours of darkness. The proposal therefore relies entirely on a private shuttle bus, which is not public transport and cannot satisfy London Plan Policy T1 or T4. 2.4.5 Car Dependency TA shows the development is overwhelmingly car-based. The TA demonstrates that the development will be overwhelmingly car-dependent, with up to 80–90% of users arriving by private car. This is fundamentally incompatible with London Plan Policy T1 (80% sustainable mode share by 2041) and Policy T6 (car parking restraint). The TA's own data shows the proposal will increase car dependency, not reduce it. 2.4.6 Abnormal Loads The swept path analysis shows that abnormal loads will require removal of street furniture, widening of footways and temporary traffic management at multiple locations. This demonstrates that the rural road network is fundamentally unsuitable for the scale of construction proposed. 2.4.7 Construction Impacts The TA confirms that construction will last up to 20 years and will require widening of Fen Lane, removal of traffic islands and extensive abnormal load movements. This represents a prolonged period of disruption incompatible with a rural village environment and contrary to London Plan Policy T7 (construction logistics). The proposal has not adhered to the Green Construction Board carbon hierarchy PAS2080 which requires that alternative approaches be considered before building any new facility. 2.4.8 Water Supply and Wastewater The ES acknowledges the very significant water demand and estimates up to about 100 million litres annual water consumption (figures vary across the documents depending on whether horticultural use is included). However, the documentation does not adequately assess: • Reliance on promised but not confirmed utility company capacity. Essex and Suffolk water will need to build additional reservoir capacity to supply the water needs • A large percentage reduction in water use is promised via rain water harvesting but other documentation notes that this cannot be relied upon • No assurance is given that domestic water supplies will not be threatened in case of severe prolonged

		drought and LBH has not sought assurance of this via section 106 agreements • There is no critical review of the alternative to use of potable water for cooling • Cumulative impacts with other regional developments such as the very large housing developments planned nearby 2.4.9 Drainage and Flood Risk The Flood Risk Assessment and ES confirm that: • “Surface water management will require significant intervention” • “Large areas of hardstanding will alter runoff patterns” The development introduces: • Very large areas of impermeable surfaces • increased runoff compared to arable fields • potential downstream flood risk if containment ponds are overwhelmed The ES does not adequately assess: • Climate-change-driven rainfall extreme events which are markedly increasing in frequency and intensity • Cumulative impacts with other regional developments such as the very large housing developments planned nearby that may be affect drainage and flood risk • Long-term maintenance of sustainable drainage systems (SuDS) necessary for continued effectiveness • Failure scenarios e.g. of key mitigation equipment 2.4.10 Emergency Access and Safety The ES does not adequately assess: • Emergency access during construction • Emergency generator operation • Fire risk in data halls • Evacuation routes • Access for emergency vehicles on rural roads • Cumulative risk with other infrastructure projects 2.4.11 Construction Logistics The APPENDIX 1e – Code of Construction Practice LDO Appendix 4.pdf confirms: • “Construction will take place over a 17-20 year period” • “Significant construction traffic movements” • “Dust generating activities” A 17-20 year construction programme is: • Unprecedented for an LDO • Incompatible with rural infrastructure • Harmful to residents’ health and wellbeing • Disruptive to local businesses and farms • Likely to cause long-term road degradation The ES does not assess: • Cumulative construction impacts • Peak construction traffic • Abnormal loads • Road safety impacts on local residents • Construction noise over 17-20 years • Construction emissions • Construction lighting impacts The ES fails to assess cumulative impacts with: • Lower Thames Crossing • Brentwood Enterprise Park • Warley GSP • Other data centre proposals in the region • Local housing developments

		• Agricultural traffic • Seasonal tourism traffic or extreme congestion on regional roads (for example, in case of severe congestion on the M25 traffic typically reroutes via local B roads through North Ockendon 2.4.13 Infrastructure Impacts - Conclusion The infrastructure impacts of the proposed LDO are: • Significant, long-term and under-assessed • Dependent on unconsented infrastructure • Incompatible with rural road networks • Unsafe • Inappropriate for an LDO mechanism 2.5 POLICY CONFLICTS The proposed East Havering Data Centre Campus LDO is in direct conflict with national, regional and local planning policy. The evidence provided does not demonstrate compliance with the National Planning Policy Framework (NPPF), the London Plan, or the Havering Local Plan. In several cases, the LDO actively undermines the strategic objectives of these policies. 2.5.1 6.1 Conflict with the National Planning Policy Framework (NPPF) 2.5.1.1 Green Belt policy Please refer to Section 2.1 above. 2.5.2 Failure to protect biodiversity The NPPF requires: • Protection of habitats • Measurable biodiversity net gain • Avoidance of significant harm Refer to 2.3.2 above 2.5.3 Failure to minimise climate impacts The ES does not quantify: • Embodied carbon • Generator emissions • Construction emissions • Grid reinforcement emissions This is a major omission for a development of this scale. 2.5.4 Conflict with the London Plan (2021) 2.5.4.1 Green Belt protection (Policy G2) Policy G2 states: • “The Green Belt should be protected from inappropriate development.” • “Development proposals that harm the Green Belt should be refused.” This is a direct conflict with Policy G2 (refer to Section 2.1 above) 2.5.4.2 Biodiversity and Urban Greening (Policies G6 & G7) The London Plan requires: • Protection of priority habitats • Measurable biodiversity net gain • Avoidance of fragmentation Refer also to section 2.3.2 above. This conflicts with Policies G6 and G7. 2.5.4.3 Transport and Healthy Streets (Policy T2) Policy T2 requires: • Safe, healthy, accessible streets • Minimisation of car dependency • Protection of vulnerable road users But refer to sections 2.3.6 and 2.4 above indicating conflicts with Policy T2. 2.5.4.4 Climate Change Mitigation (Policy SI2)

		The London Plan requires: • Whole-life carbon assessment • Minimisation of operational emissions • Reduction of diesel generator reliance[Note: those in this development are powered by “biodiesel” which has comparable emissions to conventional diesel generators] The ES does not provide: • Whole-life carbon data • Realistic generator emissions modelling • Credible low-carbon energy strategy This conflicts with Policy SI2. 2.5.5 Conflict with the Havering Local Plan (2021) 2.5.5.1 Green Belt protection (Policy 18) Policy 18 states: • “The Council will protect and enhance the Green Belt.” • “Inappropriate development will not be permitted except in very special circumstances.” This is a direct breach of Policy 18. 2.5.5.2 Biodiversity and Nature Conservation (Policy 23) Policy 23 requires: • Protection of habitats • Avoidance of fragmentation • Measurable net gain But the evidence in section 2.3 above indicates that this project conflicts with Policy 23. 2.5.5.3 Healthy Communities (Policy 10) Policy 10 requires: • Protection of residents’ health • Minimisation of noise, pollution and disruption • Safeguarding of wellbeing But sections 2.3 and 2.4 above shows that this conflicts with Policy 10. 2.5.5.4 Sustainable Transport (Policy 24) Policy 24 requires: • Minimisation of car use • Safe walking and cycling routes • Realistic modal shift strategies But sections 2.3 and 2.4 above shows that this conflicts with Policy 24. 2.5.6 Conflict with the Purpose of Local Development Orders Government guidance states that LDOs are intended for simple, low-impact, predictable and non-controversial development This proposal is: • The largest data centre campus in the UK • A 17-year construction project • A complete transformation of 218 ha of Green Belt • Dependent on unconsented power infrastructure • Causing significant adverse environmental effects This is fundamentally incompatible with the purpose of an LDO. 2.5.7 Conclusion of this section The proposed LDO is in clear and substantial conflict with numerous national and local policies including the NPPF, the London Plan, the Havering Local Plan and the purpose of Local Development Orders 2.6 PROCEDURAL OR EVIDENCE WEAKNESSES The evidence base supporting the proposed East Havering Data Centre Campus LDO contains major procedural flaws, missing information, internal contradictions and methodological weaknesses. These issues undermine the legality, rationality and robustness of the LDO process. Key procedural and evidential failures

		are outlined below. 2.6.1 Transparency in Risk Assessment Processes Risk assessments should use a transparent scoring matrix: numbers, weights, thresholds. I cannot conclusively say that this applies to all documents, but the EIA does not follow that structure. Instead, it uses broad labels like negligible, minor, moderate, major, but lacking any published scoring rules. The ES openly states that significance is based on judgement: • “Significance has been determined based on published thresholds and/or the application of professional judgement and experience.” Risk assessment always requires expert input but this approach means that no one outside the consultant team can reproduce the results and there is unlikely to be an audit trail and two assessors could reach different conclusions. This is the opposite of a transparent robust risk-based approach. Defra Environmental Risk Assessment Methodology (also called Green Leaves III) is used across Defra, the Environment Agency, Natural England and major infrastructure projects (https://www.gov.uk/government/publications/guidelines-for-environmental-risk-assessment-and management-green-leaves-iii). Green Leaves III is the UK Government’s core framework for environmental risk assessment. It sets out: • How to formulate the risk problem • How to assess magnitude, probability and uncertainty • How to evaluate management options • How to communicate and document risk transparently A rationale for not using what is essentially the government’s recommended approach has not been given. In the data centre EIA they “translate” significance tests into their own softer categories e.g. • “Assessment conclusions have been translated into the EIA significance terminology… based on professional judgement.” This translation step allows a “significant” effect under official guidance to be re-labelled as “minor adverse” or “moderate adverse” in the ES. This is a major mechanism for downplaying risk. Mitigation is assumed to work perfectly before impacts are judged. In a risk assessment, it is typical to assess: 1 Unmitigated risk without additional control measures / safeguards, then: 2 Residual risk after mitigation (including additional safeguards) Here, they skip step 1, for example: The ES says: • “Assessment… taking into account mitigation measures that are embedded in the proposed development.” This means: • The “before mitigation” impacts are never shown • The public only sees the optimistic, mitigated scenario • If mitigation fails, the real impacts could be far worse. The ability of control measures to mitigate risk varies considerably e.g. those that rely on perfect, repeatable human behaviour are often shown to be weaker than well designed physical hardware. Rather than take a precautionary approach (assume it is a risk then address how to lower the risk) they seem to work backwards - assume it must be acceptable and hide behind waffle such as "professional judgement" Impacts are split into silos, hiding the combined burden: Each topic is assessed separately across numerous fragmented often seemingly duplicate documentation. Each of the scoped-in environmental topics have been reported on in a separate technical assessment chapter. This fragmentation means it is very difficult to get an overall picture of risks • Noise, traffic, landscape, ecology, flood risk etc. are never combined • Residents on Fen Lane never get a single “total impact” picture • The Green Belt never gets an overall harm rating • The cumulative risks section is descriptive, not quantitative. The ES claims to use a worst-case approach but the “reasonable worst-case” is defined by the developer.: • “The EIA adopts a reasonable ‘worst-case’ assessment… drawing on professional experience.”

		But: • “Reasonable” is undefined • The developer’s consultants decide what counts as worst-case • There is no independent check This gives them wide discretion to keep impacts within “acceptable” bounds. The result: • Many harms are described clearly but labelled “not significant” Across the ES, you see a pattern: • Real, measurable harm is described • But the conclusion is “not significant” This happens in • Air quality • Traffic • Noise (except a few properties) • Ecology • Water resources • Public transport 2.6.2 Missing Surveys and Incomplete Baseline Data The Environmental Statement (ES) repeatedly acknowledges that baseline surveys are incomplete. ES Chapter 11 – Ecology.pdf identifies that further surveys are required or that some areas could not be accessed. This is a fundamental flaw as an LDO should not be adopted when baseline ecological data is incomplete. Land west of the cable corridor has not been surveyed ES Chapter 5 – EIA Process and Methodology.pdf confirms: • “Site specific surveys… have not been undertaken” • “The final cable routes are outside of the redline boundary” This means: • the environmental impacts of the cable route are not assessed • the land required for the cable route is not included in the LDO boundary • the LDO is being asked to approve a development without knowing where the power infrastructure will go This is procedurally unsound. 2.6.3 Unassessed External Infrastructure The development depends on: • A new Warley GSP substation • New 132 kV cable routes • Potential off-site works • Land outside the LDO boundary But these are not consented, assessed, surveyed or included in the redline boundary The APPENDIX 13 – Power Availability Report.pdf repeatedly uses conditional language: • “Subject to confirmation” • “Dependent on reinforcement works” • “Capacity may be available” This is not a lawful basis for an LDO. 2.6.4 Contradictions and Circular Arguments There are numerous contradictions across the evidence base. It is claimed that there is a clear and urgent need for this development yet no alternative sites were taken forward for detailed assessment. The arguments used are circular: The developer wants this site, therefore this site is needed. 2.6.4.1 Green Belt Assessment vs Statement of Reasons The APPENDIX 11 – Green Belt Assessment Report.pdf states: • “The site is wholly open… free from any notable areas of built development” (p.3) • “The site performs strongly against Green Belt purposes” (p.21–22) But the Statement of Reasons implies that the site is lower performing Green Belt. This is a misrepresentation

		of the evidence. 2.6.4.2 Landscape Assessment vs Need Assessment The landscape assessment identifies: • “Major Adverse (significant) visual effects” (TA 15.2, summary table) But the Needs Assessment claims: • “The site is suitable for large-scale development.” These statements cannot both be true. 2.6.5 Alternatives assessment is fundamentally flawed The Sites Assessment (APPENDIX 14 – Sites Assessment.pdf) uses criteria that: • Require a single site of 200+ hectares in East London • With grid connection potential • And developer interest These criteria guarantee that only the applicant’s preferred site will pass which is an inadequate alternatives assessment. 2.6.6 Over-reliance on embedded mitigation The ES repeatedly assumes that: • Planting will mature • Bunds will screen views • Habitat creation will succeed • Modal shift will occur • Generator use will be minimal (yet the stated maintenance testing hours amount to 8000 hours per year But these assumptions are unproven, unenforceable, unrealistic and often contradicted by evidence. 2.6.7 Under-assessment of worst-case scenarios The ES does not assess: • Emergency generator operation • Simultaneous generator testing • Peak construction traffic • Cumulative construction impacts • Climate-driven rainfall extremes • Failure of sustainable drainage systems (SuDS) • Grid reinforcement delays • Power shortfalls • Failure of the water utility company to obtain permission for and build additional reservoir capacity This is a major EIA deficiency. 2.6.8 Inappropriate Use of the LDO Mechanism Refer to Section 2.5.6 above. 2.6.9 EIA Deficiencies The ES fails to: • Assess cumulative impacts or assess realistic alternatives • Assess off-site power infrastructure • Provide complete baseline data • Quantify climate impacts • Assess emergency scenarios • Assess long-term health impacts • Assess construction impacts over 17-20 years • Assess agricultural impacts • Assess soil degradation • Assess landscape impacts during construction These omissions render the ES incomplete and unreliable. 2.6.10 Lack of Transparency and Public Scrutiny The approach adopted here is effectively saying that a few specialists, sat in a remote office can ponder for a

		while and decide the fate of this patch of greenbelt for the next 20 years. Planning decisions and the risk management processes that underly them should not be a one off, cast-in stone approach. Risk controls must be regularly reviewed for their effectiveness, as technology, organisations and economic factors change over time. New regulations or management changes can shift accountabilities, while engineering systems degrade and financial support may be reduced, especially if no adverse events have occurred, giving a false sense of security. Ongoing review that includes technical analysis and stakeholder feedback helps to demonstrate competence and fairness in the whole process. The Gunning Principles are the legal test that determines whether a public consultation in the UK is fair, lawful, and meaningful. They come from a 1985 court case (R v Brent LBC ex parte Gunning) and have since been repeatedly upheld by the courts as the standard against which all consultations are judged. They are widely cited in judicial review cases and by public bodies themselves. The key principles are: 1. Proposals still at a formative stage: A final decision must not have been made yet, and the decision-maker must have an open mind. 2. Sufficient information for intelligent consideration: The consultation must provide enough information to allow consultees to understand the issue and give an informed response. 3. Adequate time for consideration and response: Sufficient time must be allowed for people to participate, often understood as a 12-week period. 4. Conscientious consideration of responses: Decision-makers must demonstrate that they have properly considered the consultation responses before making a final decision The LDO process clearly fails the against the Gunning Principles: • The short consultation period to examine thousands of pages of highly technical and often contradictory material severely limits public consultation and reduces democratic oversight • Bypasses normal planning scrutiny at local, regional and national levels • Prevents ongoing review of site-specific assessment at later stages • Removes the ability to challenge future phases • Should include a Section 106 process to ongoing review and stakeholder communication This is inappropriate for a development of this scale. 2.6.11 Conclusion of this Section The evidence base supporting the LDO is incomplete, contradictory, procedurally flawed, methodologically unsound, reliant on unassessed infrastructure, incompatible with the purpose of an LDO, insufficient to justify Green Belt release and inadequate to demonstrate Very Special Circumstances. The LDO cannot rationally be adopted on the basis of this evidence. 2.7 STRATEGIC SAFETY, SECURITY and RESILIENCE RISKS Although some of the issues outlined in this section extend beyond the immediate statutory remit of the London Borough of Havering, they are nonetheless material planning considerations because they relate directly to: • The suitability of the site, • The safety of future occupants and nearby residents, • The resilience of critical national infrastructure (CNI) and • The potential consequences of catastrophic failure Given the scale of the proposed development, the concentration of essential infrastructure and the proximity to high-risk assets, these concerns must be considered as part of the LDO process. 2.7.1 Proximity to High-Pressure Gas Transmission Pipeline The proposed development sits adjacent to a major high-pressure gas transmission main, with parts of the national high-voltage electricity grid running directly above or near it. Statement of Reasons.pdf “4.10 The site is also crossed by the Hordon to Abridge High Pressure Gas Pipeline and is therefore within a Health and Safety Executive (HSE) major hazard zone. A low-pressure gas main also crosses the western most confines of the site on a north-south alignment." The project documentation acknowledges: • a 3-metre exclusion zone either side of the pipeline,

		• no buildings within 25 metres and • the requirement for Cadent approval for works. However, the LDO would permit: • 17–20 years of heavy construction traffic, potentially causing sustained ground compaction, via vibration and surcharge loading, • Repeated contractor turnover over the extended construction period These factors materially increase the risk of pipeline damage over time. 2.7.1.1 Real-world evidence of risk I have personally witnessed a near-miss in which piling contractors drilled through a six-inch gas main despite following approved method statements and working from a marked pipeline location. The recorded position was found to be inaccurate by several metres. Only luck prevented ignition. Additionally, in 2024 at Romsey, Hampshire a pipeline rupture, occurred without third-party interference, which demonstrates that failures can occur spontaneously. A catastrophic gas main failure adjacent to a 600MW data centre campus would have regional consequences for safety, energy supply and emergency response. 2.7.1.2 Organisational Memory Degradation Over a 17–20 Year Construction Period Based on nearly three decades of experience in safety and environmental management and auditing roles, I am concerned that: • Over a multi-decade construction period, • With multiple contractor changes and inevitable staff turnover, • Evolving site layouts and • The eventual removal of temporary fencing and signage, the original safety constraints around the gas main and other buried assets will inevitably degrade. • Documents get lost. • Boundaries shift. • New contractors arrive without full context. Twenty years from now, a routine excavation could become a national-level incident This is not a hypothetical risk: it is a well-documented organisational phenomenon recognised by regulatory authorities such as the Health & Safety Executive. 2.7.2 Concentration of Critical National Infrastructure in One Location The LDO would cluster a vast amount of CNI in a single rural location, including: • 600MW of electrical demand, • Multiple substations and transformers, • 286 oil powered generators, • Up to 100 million litres of annual water use, • All data connectivity routed through two fibre optic data cable routes, in close proximity to each other, For a development of national significance, these multiple vulnerabilities in close proximity are an unacceptable risk with implications for: • Regional energy security, • National digital resilience, • Emergency response capability, • The UK's wider CNI risk profile. 2.7.3 Emergency Preparedness and Response Limitations Catastrophic events are rare, but emergency planning must assume worst-case scenarios. The site's location presents inherent challenges: • Limited access routes, • Rural road network, • Proximity to residential areas, • Potential for simultaneous gas, power and IT failures, • Difficulty in evacuating a large, complex industrial campus. A major incident could overwhelm local emergency services and have potentially regional implications.

		2.7.4 Broader Strategic and National Security Implications The combination of: • Massive electrical load • High-pressure gas infrastructure • Concentrated IT assets and fibre egress via two physically close routes • Public disclosure of sensitive site vulnerabilities giving hostile actors information that facilitates disruptive activities. This creates a strategic vulnerability that is inconsistent with: • London's resilience strategy, • national critical national infrastructure (CNI) guidance, • modern distributed-architecture principles for digital infrastructure. This is not an argument against data centres or AI. It is an argument against placing 'all your eggs in one basket'. As the old adage suggests, this is not a wise practise 2.7.5 Conclusion The proposed LDO raises serious strategic safety, security and resilience concerns that have not been assessed in the Environmental Statement or supporting documents. These risks are material to the suitability of the site and the appropriateness of the LDO mechanism. A development of this scale, complexity and national significance requires: • a full, independent security and resilience assessment and • a full planning application, not an LDO. LDO is being used to approve a development whose scale, impacts and strategic implications extend far beyond the remit of a single borough. Wider scrutiny (GLA, national bodies, resilience agencies) is essential. 2.8 GLOBAL CONTEXT AND SUSTAINABILITY ISSUES Although global environmental and geopolitical issues sit beyond the direct statutory remit of the London Borough of Havering, they are nonetheless material considerations when assessing whether a development of this scale should be granted permission through a Local Development Order (LDO). The world is entering a period of profound environmental, resource and geopolitical instability. Decisions about major infrastructure, particularly energy-intensive digital infrastructure, must be made with full awareness of these wider pressures. The proposed East Havering Data Centre Campus is not a minor local development. It is a 600MW, water-intensive, globally connected, nationally significant digital asset. Approving such a development through an LDO, without full scrutiny, is inconsistent with the scale of the global challenges it intersects with. 2.8.1 Global Energy Pressures and Grid Instability The International Energy Agency (IEA) and multiple national regulators have warned that: • Global electricity demand is rising sharply, • Data centres are becoming one of the fastest-growing energy consumers worldwide, • Grid resilience is under increasing strain, • Countries must plan carefully to avoid destabilising their energy systems. A single 600MW data centre campus represents: • a major regional load, • a potential stress point for the UK grid, • a long-term lock-into high energy consumption. Approving such a development through an LDO - without a full national-level energy assessment - is inconsistent with global and national energy security realities. 2.8.2 Water Scarcity and Climate Change Climate change is driving: • More frequent droughts, • Reduced summer river flows, • Increased competition for water resources,

		• Heightened pressure on water utilities. The proposed development requires up to 100 million litres of water per year which raises regional as well as local concerns: • London and the Southeast are already classified as water-stressed regions • Climate projections indicate increasing scarcity • Large industrial water users must be assessed in the context of future climate resilience, not present-day averages An LDO cannot provide the level of scrutiny required to assess long-term water sustainability in a changing climate. 2.8.3 Global Cybersecurity and Geopolitical Tensions The UK Government, NATO and the National Cyber Security Centre (NCSC) have all highlighted: • Rising geopolitical tensions • Increased targeting of critical digital infrastructure • Hybrid cyber-physical threats • The need for distributed, resilient architectures Concentrating 600MW of computing power, data connectivity in close proximity and multiple substations and generator farms in one rural location creates a high-value, high-visibility target. In a world of increasing geopolitical instability, this is a strategic vulnerability that cannot be assessed adequately through an LDO. 2.8.4 Global Biodiversity Decline and Land-Use Pressures The UN, numerous biodiversity groups and UK Government all recognise that: • Biodiversity loss is accelerating globally • Habitat fragmentation is a major driver • protecting remaining green spaces is essential The proposed development would: • Permanently convert 218 hectares of open countryside • Fragment ecological corridors • Reduce landscape permeability In the context of global biodiversity decline, the precautionary principle should apply. An LDO is not an appropriate mechanism for approving a development with such irreversible land-use impacts. 2.8.5 Global AI Growth and the Need for Strategic Approach As a former research scientist, I recognise the enormous potential of AI to transform medicine, biology and environmental science. However, global best practice should be to impose regulatory controls on the extent to which AI can be allowed to rule our lives for better or worse. We should prioritise large-scale AI compute infrastructure in: • Designated technology clusters close to needs, • Areas with robust grid capacity • Brownfield industrial zones • Sites designed for long-term resilience The UK Government has already identified AI Growth Zones and the East Havering site is not one of them. Approving a globally significant digital asset in an isolated Green Belt location is inconsistent with international norms and national strategy. Chapter 4: Proposed Development and Construction document makes reference to “4.18 Data centre buildings would be designed to be flexible and adaptable to accommodate evolving data centre technologies and innovative cooling and backup power strategies.” This is understandable given the pace of change of technology yet it undermines the case for a 20 year LDO, in effect giving the developer ‘carte-blanche’ to do as they please. A more democratic approach, and perhaps how the planning process should work, would be to request outline planning approval for the full development and then seek specific approvals for each build phase. 2.8.6 Why These Global Issues Matter for the LDO Decision These global pressures: energy, water, climate, biodiversity, cybersecurity and AI infrastructure strategy all

		point to the same conclusion: A development of this scale must be subject to: • Full environmental assessment • Full security and resilience assessment • Full public scrutiny • Full democratic oversight An LDO is designed for simple, low-impact, predictable development. It is not designed for a project with global-scale implications over decades. 2.8.7 Conclusion In a world facing accelerating environmental, resource and geopolitical challenges, the decision to approve a 600MW, water-intensive, globally connected data centre campus on high-performing Green Belt land cannot be made through an LDO. The global context reinforces, rather than replaces, the local and national planning concerns. It demonstrates that this development requires the highest level of scrutiny, not the lowest.
389	Individual	Further to my email below I would like to add another aspect regarding the due diligence aspect I have noted in the objection letter. Question Special purpose vehicles, trusts and cross-border holding companies that make it hard to see who ultimately controls the asset are common in the commercial world. Have sufficient legal safeguards been put in place to ensure that all the risk management, control and mitigation measures detailed in the consultation documents will be carried forward the any future legal entities? I am not suggesting that Digital Reef is intending to operate illegally but I understand that it is quite common in this field for one developer to obtain the necessary planning approvals and then sell the whole package to a specialist data centre developer. References A Google search using the term " please find examples in the UK of where one property developer gets planning permission for data centre then sells it on" Google answer Developers in the UK often secure planning permission for data centers—particularly on challenging "grey belt" or brownfield sites—before selling to specialized operators or tech giants (hyperscalers). Key examples include Greystoke's proposed Iver landfill site (challenged by legal action), and Blackstone/Britishvolt site, which was recently approved for a major data center Examples of Development/Planning to Sale Activity West London Technology Park (Iver):Developer Greystoke secured government planning approval for a data centre on a former landfill site in Iver, Buckinghamshire, in July 2025, overcoming local council objections, and has been involved in maneuvering the site towards development. Former Britishvolt Site (Cambois): Following the collapse of Britishvolt, Blackstone acquired the site and secured planning approval for a large-scale data center, representing a "land-to-operator" pivot. Wickford, Essex Data Centre: Developer Caineal recently received approval for a £1.3bn project. Such projects often involve developers securing entitlements before bringing in specialist partners or selling the approved project. https://www.datacenterdynamics.com/en/news/data-center-project-in-basildon-uk-gets-green-light-from-planners/ (Segro / Thorney Lane LLP (Iver): Developer Segro has been active in developing data centers,, and is known for creating sites before finalizing operational partnerships. British Land Portfolio Sale: British Land successfully sold a portfolio of office and data center assets. I always treat search results with some scepticism but other search engines reveal similar e.g. £4B Borehamwood Data Centre Deal (2025): Planning permission was granted in January 2025 for a £4 billion, 2 million sq ft data centre near Borehamwood, UK. The project was developed by an SPV owned by local property investors Griggs Homes and Andy Brewer. After securing planning permission, the scheme was put up for sale, with the current owners potentially retaining a stake. This is a clear example of an SPV being packaged and sold after planning permission was obtained https://www.bisnow.com/london/news/data-center/meet-the-low-key-local-property-company-that-lined-up-a-4b-data-centre-deal-129410 Relevant references https://www.datacenterdynamics.com/en/news/18-data-centers-shut-down-in-sweden-for-illegal-cryptomining/

		https://ttms.com/aml-risks-in-real-estate-how-automation-helps-reduce-exposure/ https://financialcrimeacademy.org/money-laundering-in-real-estate/ Complex financial systems create litigation risk which is undesirable and costly for LBH https://www.quinnemanuel.com/the-firm/publications/client-alert-emerging-litigation-risks-in-financing-ai-data-centers-boom/
390	Individual	Also refer to separate document Independent Noise survey. You say that the baseline background noise at rest is 45 db this is not a true fact, at no time was a true sound survey carried out at the centre of the proposed Data Centre site, had it been the sound would be less than the 24db recorded at my property as there is currently no sound source at the centre of the land proposed for this development, you would be further away from any sound sources. [redacted] Please provide evidence of a map and photos and your sound equipment reading and the date that it was completed. In [redacted] words, any noises given off by the Data Centre must be equal to or less than the existing background noise, not greater than or noisier than the current noise which is 24 db at my property. Please see a copy of our independent report. [redacted] immediate Noise & Vibration survey carried out by a professional auditor over a 5-7 day period for a period of 24 hours a day. Please see my independent noise survey carried out at my property, the baseline background noise at the rest period is 24 db You mention this being 45db this is total fabrication, and no stage did I see a noise survey being carried out over a fixed period on the proposed site, can you please provide evidence of your sound equipment and photos and a map of when and where you carried this out, as the sound reading results would have been even lower than mine had you carried this out on the land in the centre of the proposed development as there is no sound there what so ever. [redacted] This is not a credible noise report for a development of this type. [redacted] immediate Noise & Vibration survey carried out by a professional auditor over a 5-7 day period for a period of 24 hours a day. Please see my independent noise survey carried out at my property, the baseline background noise at the rest period is 24 db You mention this being 45db this is total fabrication, and no stage did I see a noise survey being carried out over a fixed period on the proposed site, can you please provide evidence of your sound equipment and photos and a map of when and where you carried this out, as the sound reading results would have been even lower than mine had you carried this out on the land in the centre of the proposed development as there is no sound there what so ever. [redacted] This is not a credible noise report for a development of this type. [redacted] immediate Noise & Vibration survey carried out by a professional auditor over a 5-7 day period for a period of 24 hours a day. EIA noise output to the nearest property to the proposed DataCentre. Generator Noise output of 600MW data centre.

		This is the noise level that generators would give off In a power supply outage situation which is also way above the Baseline back ground noise levels. Baseline/background noise is the existing sound level at your house before the data centre generators run. What you're really asking is: what noise level might reach my house if a 600 MW data centre had to run on emergency generators for an extended period? A rough answer is: it could be very significant, but the number at your house depends mainly on: • how many generators there are, • each generator's acoustic treatment, • how far your house is from them, • whether there are buildings/barriers between you and the plant, • whether exhaust stacks, louvres and cooling air paths are also attenuated. For large diesel gensets, open sets are often around 100–120 dB(A) at 1 m, while the industry often targets around 85 dB(A) at 1 m for enclosed sets; some specially treated installations can be lower. A recent UK data-centre permitting document says its bespoke acoustic canopy reduced each generator pair to 75 dB(A) at 1 m from the exterior of the unit. For scale, one current UK data-centre example uses 12 emergency generators at 3.2 MWe each. A 600 MW site on that sort of generator size would need on the order of about 188 generators to cover the full load, assuming like-for-like sizing. Using that as a rough engineering estimate only, if you assumed: • about 188 generators, • each effectively around 75 dB(A) at 1 m once enclosed, • all operating together, • no strong extra shielding benefit, then the notional combined level from the generator field works out roughly like this in free field: • 100 m: about 58 dB(A) • 200 m: about 52 dB(A) • 500 m: about 44 dB(A) • 1,000 m: about 38 dB(A) Those figures are approximate and can move quite a bit either way, but they show the order of magnitude. If the actual enclosure performance were closer to 85 dB(A) at 1 m rather than 75, add roughly 10 dB to those estimates. That would mean roughly: • 100 m: about 68 dB(A) • 200 m: about 62 dB(A) • 500 m: about 54 dB(A) • 1,000 m: about 48 dB(A) That matters because if your current background is really around 22 dB, even the lower of those scenarios would represent a very large change in character at a nearby house. Also, BS 4142 is the normal UK method for assessing industrial/commercial sound at residential premises, and the impact is judged not just by level but also by context and sound character. Two important points: 1. Extended generator running is not the same as a short emergency test. A long mains outage with full-site generator operation is closer to a temporary industrial plant scenario than a routine weekly test. 2. The worst annoyance may come from tone, exhaust and low-frequency content, not just the headline dB(A). Even if the averaged dB(A) looks moderate, a constant diesel "hum", fan noise, exhaust breakout, and louvre noise can be much more intrusive than the same number from road traffic. So my honest view is: • At 100–300 m from a 600 MW generator-backed site, there is a real possibility of material to severe residential impact unless the acoustic design is exceptional. • At 500 m, it could still be very noticeable in a quiet area.

		• At 1 km, it may still be audible, especially at night, depending on topography and shielding.
391	Essex County Council	Thank you for consulting Essex County Council (ECC) on the above draft Local Development Order for a 340,000m2 data centre use plus campus management, campus security, indoor horticulture use, district heating energy centre, ecology park and visitor centre. The proposed development is located on the eastern and southern administrative boundary of Thurrock Council and is located approximately 1.4km to the south of the Brentwood Borough Council/ ECC administrative boundaries. ECC is a key infrastructure and service provider for Essex communities, responsible for delivering and commissioning a wide range of strategic and local infrastructure requirements and public services to support and shape inclusive and healthy communities. ECC's role covers a wide range of statutory services including (but not limited to) highways and transportation, minerals, waste, surface water management, and public health. We also advise on, and have a material interest in, a number of other related place-making and place-keeping matters to assist in the determination of planning applications, such as skills, sector development, climate change and net zero, climate resilience and sustainable forms of energy production and supply. Summary ECC welcomes the opportunity to review and respond to this development proposal to understand the potential implications for Essex residents. We have considered the draft LDO and supporting documents, and whilst we do not wish to object to these proposals, we strongly recommend: 1) Given that the Essex strategic road network is expected to be relied upon as a construction route to the proposed site, we request six highways related conditions are added to the draft LDO to protect the Essex strategic road network 2) Additional conditions and S106 heads of terms obligations (as appropriate) to ensure stated environmental gains are effectively secured I hope the above is of assistance – if you require further information on the contents of This single response, please contact (NAME REDACTED) ECC Corporate Response – Havering Data Centre Draft LDO 1. Movement and Access ..... 4 2. Climate Resilience, Energy and Sustainability ..... 6 3. Employment and Skills ..... 7 4. Flood Risk and Drainage ..... 7 5. Environment and Green Infrastructure..... 7 6. Minerals and Waste Planning ..... 11 7. Conclusion..... 11 1. Movement and Access 1.1. Essex County Council (ECC), in its role as Highway Authority, would not wish to object to these proposals. However, there are issues that we would wish to raise and would request that appropriate conditions are attached to the Local Development Order (LDO). 1.2. Firstly, it is recognised that staff will have shift patterns when the centre becomes operational. The Transport Assessment (TA) indicates that three 8 hour shifts will operate within each 24 hour period, i.e. 0700 to 1500, 1500 to 2300 and 2300 to 0700 hours. The suggestion is that office / admin staff will work the 0700 to 1500 hours shift. ECC would support that approach as trip

		generation for the site will be considerable and there is significant concern that a traditional 0900 to 1700 hours working day would lead to highway capacity issues on the local highway network. We would therefore request that these working hours are embedded within the LDO. 1.3. With regard to the construction period, this is a lengthy process with completion indicated to be not until 2043. The TA highlights that there will be significant levels of construction traffic over much of that period, but with a concentration in the mid-2030s. The route for these vehicles from the M25 is proposed to be via the A127, B186 Warley Street, B187 St Marys Lane, B186 Clay Tye Road, B186 Ockenden Road and finally Fen Lane. Whilst this would seem to be the most direct and appropriate route to/from the strategic road network, it is feared that advice passed to the applicant's transport consultant may not have been fully heeded. 1.4. Table 8.1 of Chapter 8 of the Environmental Statement indicated that no concerns were raised by ECC with regard to the development's access strategy, construction trip generation and HGV routing, and operational trip generation. Construction and operational trip generation were, in fact, not discussed and those numbers have only now become apparent within the LDO submission. Furthermore, ECC conveyed to the consultant that significant works are due to be undertaken at the A127/B186 junction as part of the s278 highway works relating to the approved Brentwood Enterprise Park development. It was also conveyed that the existing bridge at that junction has been identified as weak by the ECC Structures team. Both the A127/B186 junction bridge and the Warley Street Rail bridge currently have an abnormal load ban on them. There is, therefore, a risk that this / these issues will impact the Data Centre construction process and necessitate alternative routing for an extended period. 1.5. ECC would also like to know the times of the day that construction traffic will be impacting the highway network. It is indicated that "HGV arrivals and departures would occur between the hours of 06:00-18:00, with the majority of trips taking place during the operational hours of the construction site (08:00-18:00)." The A127 in and around the area of the M25 and B186 is exceptionally busy at the peak periods. We would therefore seek reassurance that those times will be avoided as much as possible by construction traffic to avoid unnecessary disruption. 1.6. The applicant is also advised that ECC now outsource the oversight of abnormal loads within the highway network under its jurisdiction. Details, including who to contact, can be found at Abnormal loads | Essex County Council. 1.7. Lastly, it is indicated that shuttle bus services will operate during and after construction between the site and Ockenden and Upminster stations. We are also informed of existing services that connect the site with Romford, Brentwood, Lakeside and Grays. However, there is no mention of services to the east of the development. It is likely that many workers would emanate from that direction including Basildon and the large new developments coming forward at Dunton Hills Garden Village and Horndon St Marys, which Thurrock Council members resolved to approve in February 2026. It is very important that services are provided to cater for this demand. 1.8. Therefore, to summarise, ECC would wish the following to be fixed into any approval of the LDO: 1. Shift hours for the site shall be limited to 0700 to 1500, 1500 to 2300 and 2300 to 0700 hours to avoid peak hours on the local highway network.

		Reason: In the interests of highway safety and efficiency. 2. HGV movements shall be scheduled to avoid peak periods, i.e. between 7am and 9 am and 4pm and 6pm, at M25 Junction 29 and the A127 / B186 interchange. Reason: In the interests of highway safety and efficiency. 3. Prior to commencement of construction, a full structural assessment of the B186 bridge over the A127 shall be undertaken in consultation with Essex County Council, with an agreed timetable for monitoring throughout the construction period and a final assessment to be carried out following completion. Any identified mitigation required as a result of the assessments shall be fully implemented within an agreed timescale. Reason: In the interests of highway safety. 4. Prior to commencement of construction, a full structural assessment of the B186 Warley Street Rail bridge shall be undertaken in consultation with Network Rail and Essex County Council, with an agreed timetable for monitoring throughout the construction period and a final assessment to be carried following completion. Any identified mitigation required as a result of the assessments shall be fully implemented within an agreed timescale. Reason: In the interests of highway safety. 5. Prior to the commencement of construction, a joint inspection of the B186 shall be carried out by the applicant and the Highway Authority and include photographic evidence. The route should then be inspected annually thereafter until completion with any damage to the highway resulting from traffic movements generated by the application site being repaired to an acceptable standard and at no cost to the Highway Authority. Reason: To preserve the integrity and fabric of the highway and in the interests of highway safety. 6. Prior to the site coming into operation, regular and frequent public transport services between the site and the east, which shall include but not be limited to, Basildon, Dunton Hills Garden Village and West Horndon shall be provided by the developer. Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport. 2. Climate Resilience, Energy and Sustainability 2.1. ECC fully support the proposals for District Heat Networks both in the on-site and off-site capacity. As plans progress for the off-site capacity ECC would support further investigation of the proposed mixed use development at nearby Horndon St Marys as a part of any off site District Heat Network. 2.2. If there are going to be back up generators on site, ECC would encourage the use of Hydrogenated Vegetable Oil (HVO) as opposed to diesel. ECC supports rainwater harvesting across the site. 2.3. The Power Availability report sets out the agreement with UKPN to supply the site, ECC would welcome clarity on whether or not this be renewable energy, secured through either Power Purchase Agreements or by utilising Renewable Energy Guarantees of Origin certificates (REGOs)? 2.4. The LDO is clear on setting out maximum sqm spaces for each area of the proposal, if on reaching the latter phases not all the space is required, (if for example the physical hardware of datacentres becomes more efficient and therefore requires space), would other applications be considered only within

		the conditions set out in the LDO? 3. Employment and Skills 3.1. ECC welcomes reference to an Employment and Skills Strategy to be developed. We would also welcome discussions to support the development of this, especially given how close it is to ECC's administrative area, and how this may be beneficial for Essex residents. 4. Flood Risk and Drainage 4.1 ECC is the Lead Local Flood Authority (LLFA) for Brentwood Borough. Having reviewed the surface water flows in the area of development we do not consider that it will increase the flood risk within the area of the Essex LLFA area and therefore have no comment to make. 5. Environment and Green Infrastructure 5.1. ECC recognises the significant opportunities presented by the proposed Data Centre campus, particularly through the creation of a substantial Ecology Park and associated GI network. However, to ensure alignment with the London and Essex Local Nature Recovery Strategy (LNRS), preserve cross-boundary ecological connectivity, and secure long-term environmental resilience, we recommend that the LDO incorporates the additional GI and ecology conditions detailed below. Local Nature Recovery Strategies 5.2. The LNRS identifies habitat connectivity, floodplain restoration, species-rich grassland, woodland expansion, and strategic hedgerow corridors as priorities. 5.3. The habitat proposals closely reflect the LNRS priority themes for both: • London LNRS (habitat connectivity, woodland, wetlands) • Essex LNRS (floodplain restoration, species-rich grassland, hedgerow networks) 5.4. The LDO's proposed habitat mosaic (wet grassland, mixed woodland, hedgerows, wetland) can support LNRS outcomes, but only if secured, monitored and managed long-term 5.5. We recommend a condition to ensure proposal align with the relevant LNRS such as: "All landscaping, habitat creation, enhancement and management delivered under this LDO shall be in accordance with the approved Landscape Strategy and LEMMP and shall demonstrate alignment with the priorities identified in the London and Essex Local Nature Recovery Strategies." The site forms part of a wider landscape between the Mardyke Valley, Bulphan Fenland, and Thorndon Park. The Landscape Strategy identifies north–south and east–west view corridors and habitat corridors which align broadly with Essex ecological networks. GI creation should be required to maintain functional ecological and access (active travel) movement between Havering, Thurrock, and Brentwood. GI and Ecological Opportunities 5.7. The Draft Landscape Strategy (Appendix 17) proposes a wide mosaic of new habitats, including broadleaf woodland, wet woodland, meadows, hedgerow corridors, wet grassland, ponds, ditches and swales, totalling several hundred hectares of semi-natural greenspace. This aligns strongly with LNRS priorities for woodland expansion, wetland restoration, species-rich grassland, and strategic hedgerow connectivity. 5.8. Similarly, the Draft Landscape and Ecological Management and Monitoring Plan (LEMMP) (Appendix 4) provides detailed habitat classifications, target conditions, long-term maintenance and monitoring frameworks to support the

		delivery of priority habitats and improved ecological condition across the site. 5.9. ECC supports the principle of this extensive GI provision and recognises the potential for: • Biodiversity enhancement. • Strengthened ecological connectivity between Bulphan Fenland, Thorndon Park, Mardyke Valley and the wider Essex landscape. • Long-term recreational, educational and wellbeing benefits associated with a large publicly accessible Ecology Park. 5.10. However, we recommend that securing these benefits requires stronger, explicit conditions within the LDO, as outlined below. Ecological Mitigation and Landscaping 5.11. Schedule 2 requires approval of the location and final design of ecological mitigation (Condition 32) but would not secure: • final design of landscaping schemes, • Final soft landscape plans • Planting palettes and species mixes • Habitat creation specifications • Soil profiles and establishment methods • Phasing of habitat delivery • Detailed design of the Ecology Park 5.12. Given the complexity of habitats outlined in the LEMMP and Landscape Strategy, ECC recommends a condition requiring full detailed landscaping and habitat creation plans to be approved for each Build Zone prior to commencement. We recommend adding a specific condition requiring: “Detailed soft landscape and habitat creation plans for the Data Campus and the Ecology Park—including planting palettes, species mixes, habitat specifications, soil profiles, seeding plans, and phasing, shall be submitted and approved prior to commencement of each Build Zone. The development shall be implemented in accordance with the approved details.” Landscape Strategy and GI Masterplan 5.13. The Draft Landscape Strategy sets out essential GI components, including woodland belts, wetland corridors, hedgerow networks, swales, ecological enhancement features, and the overall layout of the 113ha Ecology Park. However, the LDO does not secure compliance with the Landscape Strategy. Without this, there is a risk that later phases or operators could dilute, fragment, or remove these GI assets. 5.14. We recommend a condition requiring full compliance with Appendix 17 (Landscape Strategy) to ensure delivery of the intended GI network: “The development shall be carried out in accordance with the approved East Havering Landscape Strategy (Appendix 17) unless otherwise agreed with the LPA, ensuring all GI typologies and corridor connections shown therein are delivered.” Biodiversity Net Gain (BNG) 5.15. Although a Biodiversity Net Gain Assessment (Appendix 24) has been submitted, demonstrating very substantial predicted gains (62.45% area units, 85.64% hedgerow units, and 236.55% watercourse units). There is no condition or S106 heads of term obligation proposed within the Draft LDO that secures: • The delivery of BNG as set out in Appendix 24. • The associated habitat creation plans. • Monitoring and reporting; or • The required 30-year management and funding.

		5.16. The BNG Assessment states that the LDOs are not legally required to deliver statutory BNG and describes the project's commitment as voluntary, the absence of a securing mechanism means that the significant gains outlined in Appendix 24 are not guaranteed. While Condition 32 (ecological mitigation) is helpful, it is not sufficient to secure BNG delivery, management, monitoring and reporting. 5.17. A dedicated BNG condition and associated obligation is recommended to ensure that the predicted BNG is implemented and maintained over the 30-year statutory period in line with best practice: "A Biodiversity Gain Plan aligned with the BNG Assessment (Appendix 24), must be submitted and approved by the LPA prior to commencement. It shall include habitat baselines, creation plans, timings, monitoring, responsible delivery bodies, and 30-year management secured via s106. The development shall thereafter be implemented in accordance with the approved plan." Long-Term Management and Governance 5.18. Under Schedule 1 Part 2, there are conditions on implementing the Ecology Park and LEAP. We welcome reference to the "management and operation of the ecology park in accordance with management and maintenance plan and compliance with Public London Charter" within the proposed S106 heads of terms to secure the long-term stewardship of these features. Protection of GI Assets During Construction 5.19. Although Schedule 2 condition 41 protects existing trees, however, the site includes extensive existing hedgerows, ditches, soils, waterbodies and emerging habitats, all of which require protection during the prolonged construction period. We would therefore recommend a condition such as: "A Construction Ecological and Landscape Protection Plan shall be submitted and approved prior to works, including protection of hedgerows, ditches, soils, existing trees (BS5837), wetlands and grasslands." Access Management and Disturbance 5.20. Boardwalks and access routes pass through wet woodland, wet grassland and sensitive wetland areas. A visitor access management plan may be necessary for the Ecology Park to prevent: • disturbance to ground-nesting birds • trampling of restored wetland margins • erosion • dog-related disturbance and degradation over time. 6. Minerals and Waste Planning 6.1. ECC is the Minerals and Waste Planning Authority (MWPA) for the Brentwood administrative area. We have reviewed the material and confirm that we have no comments to make. 7. Conclusion 7.1. ECC welcomes the opportunity to review and respond to this development proposal to understand the potential implications for Essex residents. We have considered the draft LDO and supporting documents, and whilst we do not wish to object to these proposals, we strongly recommend: 1) Given that the Essex strategic road network is expected to be relied upon as a construction route to the proposed site, we request six highways related conditions are added to the draft LDO to protect the Essex strategic road network 2) Additional conditions and S106 heads of terms obligations (as appropriate) to ensure stated environmental gains are effectively secured

392	Anglian Water	ASSETS Section 1 - Assets Affected Our records show that there are no assets owned by Anglian Water or those subject to an adoption agreement within the development site boundary or affected by the proposals. Any encroachment zones should be reflected in the site layout. It is highly recommended that the applicant carries out a thorough investigation of the proposed working area to establish whether any unmapped public or private sewers and lateral drains are in existence. Due to the private sewer transfer in October 2011 many newly adopted public used water assets and their history are not indicated on our records. The development site may contain private water mains, drains or other assets not shown on our records. These are private assets and not the responsibility of Anglian Water but that of the landowner Planning Report WATER RESOURCES Section 2 - Water Supply The water supply for this area is supplied by Essex and Suffolk Water therefore we are unable to make comments on the proposed water resources strategy as it is outside of Anglian Water jurisdiction to comment WASTEWATER SERVICES Section 2 - Wastewater Treatment When assessing Dry Weather Flow (DWF) headroom at the receiving Water Recycling Centre (WRC), we apply a three-year Q90 DWF average (2023–2025), together with the flows associated with sites that already benefit from planning consent. Our DWF dataset is reviewed and updated annually in consultation with the Environment Agency. This ensures that our planning assessments reflect the most up-to-date information regarding the WRC's compliance with its environmental permit and its ability to accommodate additional flows from new development without creating an unacceptable risk of breaching environmental legislation. This approach also ensures that there is no pollution or deterioration of the receiving watercourse. Based on the above assessment, Upminster WRC is within the acceptance parameters and can accommodate the flows from the proposed growth. Water Recycling Centre Encroachment We note that the northernmost part of the site falls within the Upminster Water Recycling Centre (WRC) odour buffer zone. Based on the submitted phasing and layout plans, we understand that this area is proposed as green space and, as such, would not be adversely affected by potential odour impacts or result in a loss of amenity value. Should this position change, and it is proposed that built development is introduced within the odour buffer zone, Anglian Water would need to be formally consulted. In such circumstances, an assessment would be required to consider the potential impacts on amenity, having regard to odour effects associated with the WRC. Section 3 - Used Water Network - Condition We have reviewed the Chapter 12 Water Resources and Flood Risk submitted with the application. The applicant states that the proposed development is anticipated to require 62 million litres of water per annum for cooling process. This approximately 30 % would be discharged to foul following use. Therefore, the total proposed allowable foul water discharge from the site, including the domestic and process water is 7.1 l/s. We require that the applicant consults Anglian Water in the form of a Pre-Development enquiry (PPE) in order to identify a Sustainable Point of Connection (SPOC) for each phase of the proposed development. This will avoid the constrained network which could cause pollution and flood risk downstream. The developer is to be responsible for the infrastructure to convey foul water flows from the proposed development to the receiving network. Once a SPOC has been identified and a strategy has been agreed with Anglian Water, we would expect the applicant to submit this PPE as part of their submitted documents to support a discharge condition application. We will then review and respond appropriately. Anglian Water is committed to supporting sustainable growth and in doing so we must continue to meet the statutory obligations whilst balancing factors such as climate change as environmental protection. We recommend the following condition: Condition: No development shall commence until a strategic foul water strategy has been submitted to and approved in writing by the local Planning Authority for each phase, in consultation with Anglian Water. This strategy will identify a sustainable point of connection to the public foul network. Prior to occupation, the foul water drainage works must have been carried out in complete accordance with the approved scheme.

		Reason: To protect water quality, prevent pollution and secure sustainable development having regard to paragraphs 7/8 and 180 of the National Planning Policy Framework. If permission is granted, we require the applicant to engage with us via our pre-development services and to submit a pre-development enquiry. The applicant can find further information regarding our pre-development services, including how to submit a pre- development enquiry, on our website: https://www.anglianwater.co.uk/developing/planning--capacity/how-to-apply/ Planning Report Section 4 - Surface Water Disposal From the details submitted to support the planning application the proposed method of surface water management does not relate to Anglian Water operated assets. As such, we are unable to provide comments on the suitability of the surface water management. The Local Planning Authority should seek the advice of the Lead Local Flood Authority or the Internal Drainage Board. The Environment Agency should be consulted if the drainage system directly or indirectly involves the discharge of water into a watercourse. If planning permission is granted, the strategy should be listed within the decision notice with any approved plans. It is important to note that Anglian Water has no designated surface water sewers in the area. Anglian Water will object to a new surface water connection to our designated sewer. The connection of surface water flow to a designated foul sewer will impose a high risk of flooding and pollution from the receiving network and compromise the ability of assets to operate within statutory enforced permitted limits. It should be noted that statutory operating permits of the receiving water recycling centre reflect volumetric loading, which cannot be mitigated solely by attenuating the discharge rate. Therefore should the proposed method of surface water management change, please note that Anglian Water is unable to offer a sustainable and effective surface water solution for the development site at any stage of the development
393	National Highways	National Highways (NH) welcomes the opportunity to comment on the above referenced Local Development Order (LDO) consultation for the development of new data centre buildings, indoor horticultural facility, a district heating network, Ecology Park, and visitors centre in East Havering. The consultation notification was received by NH on 25 February 2026 notifying a consultation period running from 6 March to 7 April. The end date for the consultation was subsequently amended to 12 April 2026. National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to enable national economic growth. The SRN closest to the development site ('the Site') is the M25 motorway, junctions 29 to 30, and the A13 trunk road between the M25 junction 30 and the junction with the A1089. The SRN then continues south on the A1089 until its terminal point at the main access gate to the Port of Tilbury. The site is also in the vicinity of the route of the proposed Lower Thames Crossing (LTC) project. Development Proposals The Site is located adjacent to Fen Lane, between Dunnings Lane and Ockenden Road. The proposed vehicle access is onto Fen Lane, approximately 7km from M25 Junction 29 (via B186 Clay Tye Road and A127 Southend Arterial Road). M25 Junction 30 can be reached via the A13 trunk road, approximately 11km from the site. M25 Junction 31 is approximately 10km from the site, via the B186 North Road, South Road, Pilgrims Lane, and A1306 Arterial Road West Thurrock. The Site is currently undeveloped agricultural land. The promoter proposes a total of 400,000m2 development, split across the following uses: Data Centre – 340,000m2 Indoor Horticulture Centre – 50,000m2 District Heating Centre – 3,300m2 Campus Management – 2,700m2 Visitors Centre – 600m2 The development will be split across multiple buildings and will also include an ecology park and a Locally Equipped Area for Play (LEAP), as well as associated infrastructure such as internal access roads, drainage, hard and soft landscaping, and utilities.

		The development will be constructed in 3 phases, over a period of approximately 17 years, during which time the earlier phases of the development will be in operation while the latter phases are under construction. It is expected to be fully occupied by 2043. The site is located north and east of the LTC route, which connects to the M25 motorway via a new M25/A122 junction between the existing M25 junctions 29 and 30. It is anticipated that LTC construction will be ongoing at the same time as construction of this development. National Highways Comments Our interest in this development covers two areas: the long-term traffic impacts during operation, and the traffic impacts during construction, particularly the cumulative impacts of LDO and LTC construction traffic. Actions for the promoters are identified in bold, underlined text. NH is generally supportive of growth in line with the policy principles set out in DfT Circular 1/22, and the comments and concerns set out in this response are not against the principle of the development proposed within the LDO. The focus of this response is to ensure that NH has sufficient information to enable NH to perform its role to protect the SRN and assure the integrity of the LTC project whilst supporting local growth proposals. Operation Trip Generation Section 5 of the Transport Assessment (dated February 2026) sets out the estimated travel mode share and trip generation for the site. The data centres are proposed to operate 24/7. Proposed shift times are arranged to avoid the SRN AM and PM peak hours (08:00-09:00 and 17:00-18:00 respectively). Data centre, security, and engineering staff will be split across three 8-hour shifts – a day shift (07:00-15:00), afternoon/evening shift (15:00-23:00), and night shift (23:00-07:00). Office and admin staff will only be onsite during the day shift. The indoor horticulture hours are expected to vary according to the seasons, but all arrivals and departures will be timed to avoid the AM and PM peak hours. The visitors centre will open 10:00-16:00 as a minimum, while the ecology park will be open dawn to dusk. Demand is expected to be seasonal and include school trips arriving/departing by coach. Taking the volumes of trips and respective profiles of arrivals and departures for each use into account, the promoter has identified three peak hours for trip generation and traffic impact analysis: AM Peak (08:00-09:00), Development Peak (15:00-16:00), and PM Peak (17:00-18:00). The AM and PM peak hours broadly align with the peak times for traffic on the SRN. The Development Peak allows sufficient time for development traffic to travel through the SRN junctions before the SRN PM Peak is expected to begin on most days. Trip generation has been estimated using assumptions provided by the end occupier, based on their knowledge of existing sites and intended operation. These have been verified using survey data from comparable sites for the data centre and visitor centre uses, which are expected to be the main trip generators. Mode share has been calculated based on 2021 Census Travel to Work data. Due to the impacts of the Covid-19 pandemic on travel to work at the time of the 2021 Census, this data has been compared to data from the 2011 Census, with 'working from home' excluded. This comparison found that the 2021 Census data shows a higher proportion of car drivers. Therefore, use of the 2021 Census data is considered to represent the 'worst case' scenario. National Highways is content with this approach. The overall baseline mode share for private car is 72%, reflecting the Site's current poor accessibility by passenger transport, walking, and cycling. Once mode share is taken into account, the development is anticipated to generate a total of 1,035 daily two-way vehicle trips, of which fewer than 60 are expected during each of the SRN AM and PM peak hours. We have carried out a sense-check comparison of these figures using TRICS and consider them to be robust. Trip Distribution and Assignment Section 2 of the Transport Assessment sets out the catchment area for the development, based on 2021 Census origin-destination data for workplaces for the nearest Middle Super Output Areas (Havering 018, Thurrock 004, Thurrock 006, and Havering 024). The majority of trips are expected to originate to the south, west, and east of the Site. Section 5.4 of the Transport Assessment sets out the anticipated routing for cycling, bus, rail, and vehicle trips. This has been developed based on baseline automated traffic count (ATC) surveys. However, the routing does not extend as far as the M25 or A13 junctions. The closest ATC location to the SRN is ATC 7, at the junction of Warley Street and Southend Arterial Road, less than 1km from M25 Junction 29.

		Traffic Impacts The development is anticipated to result in an additional 27 two-way trips at ATC 7 in the AM peak, and 25 two-way trips in the PM peak in the 2043 'with development' scenario compared to the 2043 'without development' scenario. However, no turning counts have been provided to evidence how many of these trips are likely to travel to M25 Junction 29. This information is required in order for National Highways to form a view on the likely impacts of the development on the SRN National Highways notes that the current construction programme provided assumes a start date in March 2026, which will not be achievable given the fact that the LDO consultation period runs into April 2026. However, it is considered that the delay in starting construction is unlikely to be sufficiently long to require re-assessment of the development impacts. Construction Code of Construction Practice We have reviewed the Code of Construction Practice, and wish to make the following comments: Section A2 refers to vehicles over 40 tonnes being routed via the M25 Junction 30 (southbound vehicles) or Junction 31 (northbound vehicles), then via Arterial Road. However, vehicles leaving the M25 at Junction 30 cannot directly access Arterial Road, as Junction 30 only connects the M25 motorway and the A13 trunk road. The routing for southbound vehicles over 30t should be corrected to show the actual route these vehicles will take. Section A4.2 states that deliveries will be scheduled outside of the peak hours "wherever possible". "Wherever possible" should be removed, and this statement should be expanded to include removals. Section A5.3, Abnormal Loads, refers to Highways Agency "Aide memoire for notification requirements for the movement of Abnormal Indivisible Loads or vehicles when not complying with The Road Vehicles (Construction and Use) Regulations 1986" and notification requirements. These are significantly out of date. This must be updated to refer to the latest NH aide memoire and associated requirements. Overlap with LTC Construction and Cumulative Impacts – Traffic The LDO boundary partially overlaps with the with the LTC Order Limits, including the following works: • Work. No. MUT28 and Streets subject to temporary alteration, diversion and restriction of use at Ockendon Road (as shown on Sheet 42 of the Works Plans and Streets subject to temporary alteration, diversion and restriction of use plans). • Earthing works on existing pylon ZB039 as part of Work No. OH7 and associated utility works access route (see Works Plans - Sheet 41) The interaction between the LDO and the LTC is primarily driven by the need to coordinate construction traffic, access arrangements and enabling works, particularly along the B186. The B186 is an important local distributor road serving the communities of Havering, Brentwood and Thurrock, providing connections between residential areas, employment locations and the wider strategic road network, including links towards Lakeside and the A13 corridor. It already carries regular local traffic, public transport movements, cyclists, and pedestrians, and plays a key role in day-to-day local accessibility. As a result, the LTC DCO recognises the need to carefully manage construction traffic to avoid additional pressure on routes such as the B186, where increased construction traffic could adversely affect capacity, safety, and local amenity. The B186 is expected to experience increased construction traffic from both LTC works and development enabled by the LDO, creating potential cumulative impacts on traffic flow, safety, and local access. LTC works affecting the B186 include temporary traffic management, abnormal load movements and utility related works planned to start on June 2026. Therefore, construction traffic associated with LDO-enabled development may overlap in time and route choice. In addition, NH notes that full planning permission was granted for the Brentwood Enterprise Park on 22 May 2025, which is also expected to generate traffic movements affecting the B186. As part of LTC Work No. OH7, the overhead electricity transmission diversion requires a range of advance and temporary works ahead of the permanent diversion programmed for October 2027. These include temporary overhead line arrangements, access tracks, crane pads, working areas and local traffic management to allow pylon construction, cable installation and removal of existing infrastructure. These works are intensive, rely on specialist plant and require short-term but disruptive access to the local road network, including routes connected to the B186. The LTC DCO includes a clear commitment to mitigate the impacts of construction traffic on both the strategic and local road networks through a controlled and coordinated approach set out in the Framework Construction Travel Plan and the Outline Traffic Management Plan for Construction. This includes early identification of construction routes, maximising the use of offline haul roads and direct access from the SRN, and minimising use of the local road network wherever practicable.

		One of the construction compounds is proposed at CA16, Warley Street, with direct access from M25 Junction 29 and the A127. Construction traffic associated with the LDO is also proposed to run via this route and could have a significant impact on traffic levels. This could potentially undermine LTC site access and the effectiveness of the workforce travel strategy. If not carefully managed, construction traffic arising from LDO-enabled development - particularly where abnormal loads, crane movements or temporary road space are required - could conflict with temporary and advance overhead line works and delay Work No. OH7, resulting in knock-on impacts to the wider LTC programme. Without appropriate controls, these interactions could result in congestion, conflicting traffic management arrangements, or reduced network resilience. As such, alignment between the LDO and the LTC construction strategy is essential to ensure that construction traffic associated with both does not prejudice the safe and efficient delivery of LTC works or the operation of the B186, particularly during peak periods of utility works. To better understand the construction traffic impacts of the LDO on the delivery of the Lower Thames Crossing, National Highways requests updated details of the construction programme and associated construction traffic forecasts which reflect the latest position on the proposed commencement of development. This should include any changes to the timing, scale and routing of LDO-enabled construction traffic, particularly in relation to the LTC works at M25 Junction 29, the A127-B186 junction works associated with Brentwood Enterprise Park, and the B186 from Warley Street to Clay Tye Road. This updated information is essential and without it National Highways is unable to assess cumulative impacts, identify potential conflicts with LTC utility and enabling works, and confirm whether additional mitigation or coordination measures are required to protect the safe and efficient delivery of the LTC programme. Ongoing engagement between the parties will be important to ensure that that any impacts arising from the interfaces between LDO-enabled development and the LTC are successfully identified and addressed. This should include participation in the LTC Traffic Management Forum, as well as other collaboration workshops as required. To arrange attendance at the Traffic Management Forum, the representatives' email addresses should be sent to PlanningSE@nationalhighways.co.uk. The contact details will be forwarded to the chair, who will distribute the invitation. Overlap with LTC Construction and Cumulative Impacts – Environmental Effects Development enabled through the LDO could introduce additional or overlapping construction effects that were not explicitly assessed in the Lower Thames Crossing Environmental Statement, particularly where works coincide spatially or temporarily with regards to sensitive receptors. Of particular relevance are the following potential cumulative impacts on local communities and environmental receptors arising from concurrent construction activity: • Potential cumulative noise impacts on nearby residential areas where LDO construction activity overlaps with LTC works. • Vibration effects associated with dismantling of existing structures and underground utility installation, which could affect nearby properties if concurrent activities occur. • Increased disturbance to ecological receptors, including protected species and habitats, where LDO works coincide with LTC construction phases that were assessed on a standalone basis. • Risk of extended duration of construction disturbance, where overlapping programmes prolong periods of noise, activity and local disruption beyond those assessed in the LTC ES and Environmental Management Plan (EMP). • Potential effects on community amenity, including tranquillity and perceived disturbance, where multiple construction activities occur at the same time or in close proximity. National Highways seeks confirmation as to whether the updated construction programme alters the conclusions of the cumulative impact assessment for the environmental effects listed above. Coordination between the LDO, Brentwood Enterprise Park, and LTC is needed to ensure that cumulative effects on communities and sensitive environmental receptors remain within the limits assessed and mitigated through the DCO, ES and EMP. In order to ensure that environmental mitigation measures secured through the DCO (such as noise controls, working hour restrictions and ecological protection measures) are not undermined by uncoordinated-LDO enabled works, National Highways requests that the LDO includes a condition requiring a Construction Environmental Management Plan (CEMP) to be submitted for approval in writing by the Local Planning Authority, in consultation with National Highways, prior to commencement of development. Overlap with LTC - Overlapping permissions In addition to the above concerns, National Highways has at present insufficient information to fully understand the degree of overlap between the development proposed by the LDO and the consented LTC project. In light of the Supreme Court judgement in Hillside Parks Ltd v Snowdonia National Park Authority 2022 UKSC [30], it is important not only for National Highways, but also for the Council as promoter of the LDO, to guard against the potential risk of invalidating either of the consents due to the two developments being inconsistent with one another. Whilst the Lower Thames Crossing DCO contains at Article 56 a provision which seeks to address the point, by confirming that planning permissions subsequently granted under the Town and Country Planning Act 1990 which conflict with the project are not intended to prevent the exercise of powers under the DCO, National Highways considers this still to be an issue which the parties should work through together and look to address and resolve where needed prior to the making of the LDO.

		I would like to thank you again for this opportunity to feed our comments into this public consultation. There are quite a few areas set out within this response where National Highways is seeking further information or clarifications on matters of great importance to the successful delivery of both projects. We encourage continued liaison through current contacts within the LTC projects and submission of further information in the first instance through planningse@nationalhighways.co.uk.
394	Thurrock Council	Thank you for consulting Thurrock Council on the proposed East Havering Data Centre Campus Local Development Order (LDO). Thurrock Council has reviewed the submitted material prepared in support of the LDO and welcomes the opportunity to comment at this stage. Transport Assessment Operational Traffic Impact Having reviewed the Transport Assessment (TA) dated 20/02/2026, the trip generation and trip distribution are considered acceptable. Table 5.8 of the TA indicates that the proposed development will generate 42 two-way vehicle trips during the AM peak 08:00-09:00, 221 two-way vehicle trips during the development peak 15:00-16:00, and 35 two-way vehicle trips during the PM peak 17:00-18:00. Although traffic impact is typically assessed using Passenger Car Units (PCUs) rather than vehicle trips, and no modelling assessment has been undertaken for any junction within Thurrock, it is not considered that the development will have a significant impact during the network AM and PK peak hours, given the number of trips generated. Whilst the trips generated during the development peak is significantly higher than during the network peaks, the impact is not considered significant given that it occurs outside of the network peak periods. Construction Traffic Impact According to Section 7.1 of the TA, the construction programme is currently anticipated to span 17 years, from March 2026 and February 2043. Figure 7.1 of the TA show the construction HGV/LGV access route (located outside of Thurrock) and the redundancy construction HGV/LGV access route (the majority of which is within Thurrock). Section 7.2 of the TA states that the redundancy route 'would be available should the proposed construction HGV route be unavailable for any reason, and for use by all abnormal loads'. As neither the frequency of the proposed construction HGV route being unavailable nor the proportion of abnormal loads is specified, it is unclear how often the redundancy route would likely to be utilised. As such, the potential construction impact could not be fully assessed. Notwithstanding the above, Appendix 8 of the TA presents the swept path of a 16.6m long, 4.2m wide articulated HGV along the redundancy construction access route. Having reviewed the swept path, it is noted that most of the swept paths are very tight along the redundancy construction access route, with vehicle encroaching onto central islands, splitter island, pedestrian refuse island and/or kerb lines at some locations. In addition, there are sections of the redundancy construction access route are not included within Appendix 8. Section 7.2 of the TA proposes traffic management and temporary works to facilitate abnormal loads movements, and states that permits for abnormal load movements and associated works and road closures will be obtained from the relevant highway authorities for each abnormal load movement. Given the swept path issues identified in Appendix 8, further information will need to be provided for any proposed temporary works to demonstrate that safety impacts can be mitigated to an acceptable level. Section 7.3.1.2 of the TA identifies December 2035 as the overall peak trip generation period when considering combined construction and operational traffic. Table 7.4 presents the traffic flow changes at each ATC survey point during this peak. Based on

		the forecast traffic flow increases at ATC sites within Thurrock, i.e. ATC 10-14, it is considered that the construction traffic impact on highway capacity during the network AM and PM peaks will not be significant. However, it is not clearly stated in the TA how construction traffic is distributed across the network. From the traffic flow diagrams in Appendix 7, it appears that all construction traffic has been assigned to the primary construction access route. The potential impact of construction traffic using the redundancy construction access route therefore remains unclear. Thurrock Council's view is that the route would traverse through South Ockendon via South Road, which is subject to a 7.5-tonne weight limit. As such, it is considered that this route as a redundancy route, to by-pass the 40-tonne structural weight limit is excessive. Additionally, the use of this route as an Abnormal Indivisible Load (AIL) route is considered wholly unacceptable due to the environmental constraints being a heavily urbanised conurbation with significant utility and highway infrastructure that would need to be diverted. Furthermore, it is considered pertinent to suggest alternative route from the A127 which could provide more expedient routing. Travel Plan Having reviewed the Draft Tavel Plan dated 20/02/2026, in broad terms, the Council considers that the approach to the operational phase, including staff travel and associated mode share measures, is acceptable in principle. The Council does, however, have a number of concerns regarding the approach taken to construction traffic within the Draft Travel Plan. Whilst the document refers to the future preparation of a Construction Travel Plan or Construction Logistics Plan, no such document has been provided as part of the current submission. Given the scale of the proposed development and the likelihood that it will be delivered on a phased basis over a number of years, this is a notable omission. The construction phase is likely to generate a significant number of HGV movements, together with associated workforce trips, and these impacts are unlikely to be confined to Havering. In particular, there is clear potential for effects on the wider highway network, including routes within Thurrock and the strategic road network including the M25 and associated junctions. In this context and having regard to the use of a LDO, the Council does not consider it appropriate for construction traffic impacts to be addressed solely through a later submission. There will be limited opportunity to revisit these matters once the Order is in place. It would therefore be expected that a framework-level Construction Logistics Plan is prepared at this stage, setting out, as a minimum, anticipated construction traffic volumes, routing (including cross-boundary movements), phasing of development and the measures proposed to manage and mitigate impacts. In the absence of this information, the Council is not satisfied that the likely transport effects of the construction phase have been adequately assessed. Thurrock LLFA 1. Overland flow path: As per the NPPF paragraph 181, for any planning application, LPA should ensure that flood risk is not increased elsewhere. There is significant overland flow paths identified within the site boundary, as indicated by the EA's surface water flood mapping. Hence, the applicant is required to provide evidence demonstrating how these flow routes will be appropriately intercepted, managed, and safely conveyed through the site, ensuring that there is no increase in flood risk within the development or elsewhere.

		2. Provision of SuDs: In accordance with the national standards for Sustainable Drainage Systems (Standard 2,3 &4), the applicant is required to incorporate a minimum of two stages of SuDs treatment trains such as raingardens, swales or filter strips, and attenuation ponds within each zone to reduce the water runoffs, improve attenuation, enhance the water quality, and reduce the impact on the receiving waterbodies. 3. Impact Assessment: The discharge from the pond 2 is at the rate of 217.7 l/s which is significant for an ordinary watercourse and to River Mardyke. This will have adverse impact on the geomorphology and ecology of the receiving watercourses. Hence, the applicant shall submit a detailed impact assessment for the proposed outfall. The assessment shall include the following: • An evaluation of the receiving watercourse capacity. • An assessment of the potential impacts on the local geomorphology of the watercourse. • Details of the outfall hydraulics, including a scour assessment. • Information on the existing ditch characteristics, including dimensions, gradients, bed material, and current condition. 4. Water Quality (Discharge of cooling water): No information has been provided regarding the strategy for managing and discharging cooling water from the data centres. Therefore, water quality risk assessment shall be provided as per the national standards for sustainable drainage system (standard 4) and, also in accordance with Standard rules SR2010No2 – discharge to surface water: cooling water and heat exchangers as per the Environmental Permitting (England and Wales) Regulations 2016. The details shall outline how this discharge will be controlled to avoid adverse impacts on water quality and the ecological status of the receiving watercourse, including the River Mardyke. Section 106 Contributions Thurrock Council notes that, to date, it has not been engaged in any discussions relating to potential planning obligations associated with the proposed development, despite the site's proximity to the Thurrock administrative boundary and the clear potential for cross-boundary impacts. Based on the information currently available, particularly in relation to the uncertainties surrounding construction traffic routing, the use of the redundancy route, and the absence of a framework Construction Logistics Plan, the Council does not consider that it is yet in a position to define specific mitigation measures or associated contributions. However, it is evident that the proposed development has the potential to give rise to impacts on the highway network within Thurrock, including during the construction phase, and potentially on the strategic road network. Thurrock Council requests that it is formally included in any ongoing and future discussions regarding planning obligations/ any Section 106 Agreement. This is to ensure that any cross-boundary impacts are appropriately assessed and, where necessary, mitigated. The Council therefore reserves the right to seek appropriate mitigation and/or contributions, informed by the submission of further information, including a detailed Construction Logistics Plan and clarification of construction traffic routing and abnormal load movements. Recommendation On the basis of the above, the Council recommends that the application is deferred

		pending the submission of further information, including a framework Construction Logistic Plan and any supporting assessment necessary to demonstrate the acceptability of the proposal, including changes to the redundancy
395	Individual	I am writing to strongly object to the proposed 400,000 square meter data centre development in North Ockendon. This proposal represents an inappropriate and industrial-scale encroachment onto protected Green Belt and ecologically sensitive fenlands. 1. Harm to Green Belt and Landscape Character The sheer scale of the proposal (400,000 sqm) is entirely inconsistent with the NPPF (National Planning Policy Framework) regarding Green Belt protection. The development would result in the permanent loss of open fenlands and significantly diminish the "openness" that defines this part of Havering. 2. Impact on Wildlife and Ecological Displacement The application site has become a vital corridor for wildlife following the displacement caused by the adjacent solar farm. This land now acts as a necessary sanctuary. The introduction of a massive industrial footprint will lead to a total loss of habitat connectivity, threatening local species that have already been pressured by previous developments. 3. Water Scarcity and Drought Vulnerability Data centers are notoriously water-intensive. Our region is categorized as an area of "serious water stress." Diverting vast quantities of water to cool servers is unsustainable and poses a direct threat to the local water table and agricultural needs of the fenlands. The developer has failed to demonstrate how this will not exacerbate local water shortages. 4. Noise Pollution and Industrial Disturbance The reliance on large-scale backup generators and massive cooling fans will create a constant, low-frequency hum. In the quiet, rural setting of North Ockendon, this noise pollution will be intrusive and result in a permanent loss of residential amenity. 5. Thermal Pollution and Fire Risk (The 'Launders Lane' Precedent) Recent research identifies a "Data Heat Island" effect, where large-scale centres can increase local land temperatures by 2°C to 4°C. In a drought-prone area, this creates a "tinderbox" effect. We draw the Council’s attention to the ongoing catastrophe at Launders Lane. Introducing a massive industrial heat source, coupled with Lithium-Ion battery storage (BESS) and backup generators, creates a high-risk environment for "thermal runaway" fires. Given the peat-rich nature of the fenlands, an underground or landscape fire would be catastrophic and nearly impossible to extinguish, placing an unacceptable burden on the London Fire Brigade. 6. Permanent Degradation of Infrastructure and Local Amenity The 20-year phased development will subject North Ockendon’s rural road network to a continuous volume of HGVs it was never designed to sustain. Structural Integrity: Fen Lane and surrounding B-roads will suffer "fatigue failure" from repeated heavy loading. Safety: Forcing constant HGV traffic onto narrow lanes used by cyclists and pedestrians creates a permanent safety hazard. Cumulative Impact: When viewed alongside the Lower Thames Crossing works, the combined traffic volume will result in total local gridlock. This 20-year build-out is not a temporary inconvenience; it is a permanent industrialization of a rural village, violating Havering Local Plan Policy DC61. Conclusion The economic benefits of a data center do not constitute the "Very Special Circumstances" required to justify such a massive industrial development on Green Belt land. I urge the committee to refuse this application.

396	Individual	[redacted] Bulphan is right next to Havering and right next to the proposed East Havering data centre. Whilst I understand the need for the UK to process/store/etc vast quantities of data, I have objections to this particular site (unlike for instance, the former Arena Essex site in West Thurrock which is much more suitable). I don't have a lot of technical knowledge, but my objections are these: It is Green Belt It is 1200 acres of productive agricultural land (I will be surprised if the crops of aubergines and tomatoes provide as much food as the land currently does) Bulphan Fenland is a very specific landscape, characterised by its openness and flatness. The proposed buildings are very high and incongruous. a fringe of immature trees will not camouflage this. Such an exposed site may prove a target for terrorism, in an effort to obstruct internet services. Co2 emissions, water use and electricity use will all be very high 10 years of construction traffic affecting our narrow country lanes to build something that has many other negative aspects is not appropriate. Please refuse this LDO and ask Digital Reef to find a more suitable site.
397	Individual	I am writing to object to the plan to build a data centre in Havering. I don’t think this is a good idea, especially because it’s meant to be built on Green Belt land. That land is supposed to be protected and not built on, and once it’s gone, it’s gone. It doesn’t seem right to build something like this there. I’m also worried about how much energy a data centre would use. These places use a lot of electricity, and it doesn’t feel like the right kind of project when there is so much focus on looking after the environment. There could also be problems for people living nearby. Big developments like this can bring more traffic, noise, and pressure on local services. It could make the area worse to live in. I also don’t see how this would really help local people. From what I understand, data centres don’t create many jobs once they are built, so it doesn’t seem like a fair trade-off. Overall, I just don’t think this is the right development for the area, and I hope the Council will think again.
398	Individual	I am writing to strongly object to the proposed 400,000 square meter data centre development in North Ockendon. This proposal represents an inappropriate and industrial-scale encroachment onto protected Green Belt and ecologically sensitive fenlands. 1. Harm to Green Belt and Landscape Character The sheer scale of the proposal (400,000 sqm) is entirely inconsistent with the NPPF (National Planning Policy Framework) regarding Green Belt protection. The development would result in the permanent loss of open fenlands and significantly diminish the "openness" that defines this part of Havering. 2. Impact on Wildlife and Ecological Displacement The application site has become a vital corridor for wildlife following the displacement caused by the adjacent solar farm. This land now acts as a necessary sanctuary. The introduction of a massive industrial footprint will lead to a total loss of habitat connectivity, threatening local species that have already been pressured by previous developments. 3. Water Scarcity and Drought Vulnerability Data centers are notoriously water-intensive. Our region is categorized as an area of "serious water stress." Diverting vast quantities of water to cool servers is unsustainable and poses a direct threat to the local water table and agricultural needs of the fenlands. The developer has failed to demonstrate how this will not exacerbate local water shortages.

		4. Noise Pollution and Industrial Disturbance The reliance on large-scale backup generators and massive cooling fans will create a constant, low-frequency hum. In the quiet, rural setting of North Ockendon, this noise pollution will be intrusive and result in a permanent loss of residential amenity. 5. Thermal Pollution and Fire Risk (The 'Launders Lane' Precedent) Recent research identifies a "Data Heat Island" effect, where large-scale centres can increase local land temperatures by 2°C to 4°C. In a drought-prone area, this creates a "tinderbox" effect. We draw the Council's attention to the ongoing catastrophe at Launders Lane. Introducing a massive industrial heat source, coupled with Lithium-Ion battery storage (BESS) and backup generators, creates a high-risk environment for "thermal runaway" fires. Given the peat-rich nature of the fenlands, an underground or landscape fire would be catastrophic and nearly impossible to extinguish, placing an unacceptable burden on the London Fire Brigade. 6. Permanent Degradation of Infrastructure and Local Amenity The 20-year phased development will subject North Ockendon's rural road network to a continuous volume of HGVs it was never designed to sustain. Structural Integrity: Fen Lane and surrounding B-roads will suffer "fatigue failure" from repeated heavy loading. Safety: Forcing constant HGV traffic onto narrow lanes used by cyclists and pedestrians creates a permanent safety hazard. Cumulative Impact: When viewed alongside the Lower Thames Crossing works, the combined traffic volume will result in total local gridlock. This 20-year build-out is not a temporary inconvenience; it is a permanent industrialization of a rural village, violating Havering Local Plan Policy DC61. Conclusion The economic benefits of a data center do not constitute the "Very Special Circumstances" required to justify such a massive industrial development on Green Belt land. I urge the committee to refuse this application.
399	Individual	Insufficient Consultation 1. This response provides a snapshot of some of the issues with the proposal. Given that the Council elected to provide a consultation period of the statutory minimum (in circumstances where that is entirely inappropriate), it has not been possible to scrutinise all the LDO documentation, which runs to some 3,400 pages. The council's decision here is plainly unlawful as it fails to consider the extensive caselaw and *Gunning* principles on sufficient consultation, and has opened itself up to legal challenge by way of judicial review. 2. The council have clearly failed to give sufficient, or any, weight to the fact that the adoption of the LDO in these circumstances is likely to be successfully judicially reviewed and the serious financial implications this would have for the council. The successful judicial review would not only lead to the council being required to pay its own and the other side's legal costs, the council would also be required to compensate the developer for withdrawal of the LDO, and to cover the cost of remediating any works done on site. Given the scale of the project, the developer compensation is likely to be an extraordinarily high sum. Serious Safety Issues 3. Insufficient weight has been given to the fact that the site is bisected by the high-pressure gas transmission pipeline. The site is therefore a Health and Safety Executive 'Major Hazard Zone' (Statement of Reasons, 4.10). 4. A 3m buffer is insufficient due to: i. Risk of the shocks and vibrations of the construction work damaging the pipeline regardless of the buffer zone; ii. Fading institutional memories of the pipeline's precise location over long-term construction with changing staff and contractors; iii. Risk that the pipeline may have an idiopathic failure or leak idiopathically (as has been seen at other places in the country), and the likelihood of extreme harm and loss of life occurring should that happen in close proximity to an installation drawing an extraordinary amount of electricity and hosting numerous fuel tanks;

iv. Such pipeline cracks or leaks often occur due to changes in the surrounding ground moisture level, causing desiccation and pipes to crack. The risk of this is obviously heightened given that the developer has free rein to undertake any drainage works it chooses, the likely high-level extraction of water from the soil, and the fact that data centres cause an increase in temperature in the locality (recent scientific study found an average 9-degree centigrade temperature increase in the vicinity of data centres).

v. The fact that data centres are targets in warfare. The largest data centre in the continent would certainly be a high-ranking target, especially when it is discovered that the data centre essentially sits on top of the gas transmission pipeline. This makes striking the site a way to hit two pieces of key national infrastructure at once, and means that any attack on the data centre would cause harm of extraordinary magnitude. It is worth noting that the council have sought no assurance that the data centre will not be used for military applications, making it an even higher-priority target.

5. It appears that the council have entirely failed to give consideration to the magnitude of the risk should any the above eventualities occur. Though the risk of the occurrence of any of the above may be considered low, the level of harm would be extraordinarily high. It would likely lead to a large loss of life as well as an environmental disaster in the borough with the council likely ending up responsible for cleaning up a site which is not only polluting the locality but the water table. Forever chemicals (PFAS) from the computing equipment, refrigerant from the cooling equipment, and diesel from the fuel tanks and generators would be released onto fenland which drains into the Mardyke river and on to the Thames. The land would certainly be polluted, and the council may be considered to be legally negligent, and individuals responsible may be considered criminally culpable for manslaughter and other offences by allowing such a disaster to occur.
6. The Council has also failed to consider the risk of water table and ground pollution during the ordinary course of data centre operation. Studies in America show that data centres are highly likely to pollute the surrounding area. The risk of PFAS (toxic forever chemicals) from computing equipment and other pollutants such as refrigerant liquids and fuel polluting the land (which in this location means released into the water table and rivers) on site is not low, and has not been properly considered.

Cultural Heritage

7. MOLA have provided a report at the behest of the developers. The council appear to have accepted the validity of this report without giving sufficient or any weight to the fact that it was not independently obtained, or that the developers have directed numerous revisions of the report (MOLA Cultural Heritage Statement p.1).

8. There are specific issues with the MOLA report which should have raised flags had it had been properly scrutinised by the council:

i. MOLA does not appear to have been informed of the length of the construction period; if it had been informed of the 20+ years of construction permitted by the LDO it would have been unlikely to fail to include the impact of construction on heritage assets;

ii. MOLA does accept that listed buildings and the North Ockenden Conservation Area (NOCA) would be adversely affected by numerous factors due to construction, but does not give them weight due to a misguided view that the construction is 'temporary' – an inappropriate designation given that the LDO allows 20+ years of construction (MOLA p.7);

iii. MOLA entirely fails to consider the harm to the grade I listed church, which will have clear views of the site from the bell tower, undermining its heritage significance;

iv. MOLA finds that NOCA's rural isolation would be eroded and that the wide agricultural landscape would be irreversibly altered by the development. This is not given sufficient weight in the conclusions;

v. MOLA also find that the listed Bury Farmhouse would suffer substantial negative impact. MOLA then fail to give this sufficient weight and to conclude that the substantial alteration of the view they find would mean substantial harm to the asset.

9. The report fails to give sufficient weight to the fact that (per MOLA):

'North Ockendon is one of the few remaining villages in Havering which has not been extended or engulfed by urban areas. The impression of rural isolation has contributed to the quality of the setting of the seven Listed Buildings, particularly in the Church Lane area. The church is a Grade I Listed Building. The historic pattern of development – two hamlets linked by an old trackway across fields – and the atmosphere of rural calm gives the area its special character.'

Plans Out of Date and Require Revision

10. The LDO documents and plans require revision before adoption can be considered for 2 key reasons (outdated impact assessments and site extension).

11. The developer has extended the site by purchasing a substantial additional parcel of land off Ockenden Road (the nursery) which adjoins the site in two directions. The plans therefore do not reflect the whole of the site and are inaccurate.

12. Many LDO documents were produced years ago and thus wholly inaccurate as they fail to consider the implications of additional projects in the area which have received planning permission in recent years. They therefore fail to produce an accurate assessment of the impact of the works on the area.

13. The plans provide for extensive works to widen Fen Lane, destroying long-established hedgerows. This will have a substantial negative effect on the rural feel key to the conservation area. Thankfully the developer's new purchase means that this is no longer necessary as access can be through Ockenden Road alone. This will save the council money as it will no longer need to undertake roadworks on Fen Lane. It will improve biodiversity by allowing the retention of extensive hedgerows which are essential habitats for wildlife including species under

		threat such as hedgehogs. It will also save the conservation area from substantial harm. Therefore, the plans should be revised to reflect this. Fen Lane should be removed from the area of the LDO. 14. Currently the plans provide for the destruction of said hedgerow starting April 2026, this obviously needs to be amended as the hedgerow should not be destroyed in nesting season. Works on Fen Lane are no longer required, but if they were, then they would need to be postponed until after the summer. Bias and Pre-determination 15. Emails provided by the council under a FOI request show that the developer and Councillors have been having inappropriate communications. This includes Councillors informing the developer of complaints made by to the council by concerned citizens, and Councillors being instructed by the developer to 'focus their minds on passing the LDO'. This demonstrates extraordinary bias and an inappropriate relationship/influence, as well as breaches of data protection/GDPR and duties of confidentiality. 16. SPC minutes of 3 March 2026 (produced by the council) show that the SPC and council decided upon the consultation period for political reasons and to allow a determination to be made ahead of the 7 May election and during the period of purdah. SPC minutes state that council officers advised that the consultation cannot be lengthened beyond the statutory minimum because it would disrupt the timetable of works and mean the decision would have to be postponed until after the election. This suggests pre-determination, shows biased decision making and that inappropriate reasons were taken into account when making decisions. It also shows an intention to breach local government regulations and make a decision during the purdah period. 17. Councillors have been promoting the data centre, including as part of HRA campaigns for re-election. The leader of the council authored an article in the Havering Daily on the 2 April which promotes the data centre project in misleading terms. This demonstrates obvious bias in the decision-making process and that the project is the subject of political activities inconsistent with purdah. 18. Should the LDO be adopted, there will certainly be questions about the unlawful works which took place by the developers to prepare the site in the absence of planning permission, and the decision of the council not to take any enforcement action regarding this unlawful work. Questions will also be raised as to why the council did not take the developer's irresponsibility and lack of observance of planning and wildlife regulations into account when deciding to pursue an LDO process. It is also relevant to the council allowing the developer to provide the evidence supporting the need for the LDO, the proposals for offsetting damage, environmental and construction care, and for allowing the developer to be the one to oversee its own compliance. 19. Should the LDO be adopted, there are also likely to be questions about the Bullens and Herds farmhouse. This listed building was destroyed (presumably to allow the development to take place) and then the council gave no comment or objection to it being retrospectively de-listed, which allowed the site to be developed. 20. Construction timetable shows works beginning before completion of the consultation (April 2026) – further evidence of pre-determination. 21. The setting of an SPC meeting for 30 April 2026, during purdah and before the consultation is closed is a further breach of the rules about purdah, and evidence of pre-determination. It is supposed that this SPC meeting (given the above) is intended for a vote on the LDO. Use of the meeting for this would be clear evidence of bias and pre-determination as the consultation has not finished, therefore the council cannot have considered any or all of the responses or know how much time it will need to adequately consider them before setting a date for an LDO vote. This also suggests that the officers and Councillors have no intention of properly considering the consultation responses. Council Due Diligence Failings 22. It appears that the council have failed to give any or sufficient weight to the financial position and inexperience of the developer. In its most recent company accounts, Digital Reef deposed to assets of £906,000 and debt of £1.2 million. Digital Reef and the directors behind it have no experience in construction and have never built a data centre (or indeed anything else). 23. At Company's House, Digital Reef's has 2 'nature of business' entries: i. Other information service activities ii. Other letting and operating of own or leased real estate Digital Reef was clearly set up as a vehicle solely for this data centre project. It's debt exceeds its assets and it has no income. This alongside the Company's House designation Digital Reef has chosen suggests it does not intend to build a data centre itself at all, but will be letting out the land to developers who have the financial means and experience to do so. 24. Not only should the council have been made aware of this, and given it adequate consideration as part of its decision-making process, it is damning that Digital Reef has chosen not to tell the council.

25. The council should consider whether any agreements it makes with Digital Reef, particularly those ancillary to the LDO itself (such as a s.106 agreement), would be binding on a third party who lets or purchases the land from Digital Reef.

Failure to Consider

26. Many of the reports on the proposal's impact fail to consider the construction period. This is due to the determination that the construction phase is 'temporary'. A 'temporary' designation is not appropriate for a construction period of 20+ years, and therefore the majority of the impact reports are inadequate as they fail to take the effect of the construction into account. It appears that many of the report writers were not told about the length of the construction. The LDO provides that as long as a development begins before the expiry of the 20-year LDO period, it may continue thereafter until it is complete. There has been a wholesale failure to consider the effect of the construction. One example of this is that, as the planning courts have recently confirmed, pollution due to construction particulates must be taken into consideration.

27. Failure to properly consider the impact of 286 diesel generators on the land, and that just for maintenance and testing, they will be running of 8000 hours per annum, releasing 2.8 tonnes of nitrogen dioxide. Given that 600mw is equivalent to the electricity usage of the city of Leeds, it seems likely that the generators will be required to provide power to the site, causing further pollution.

28. Failure to consider that there are already water shortages in the area and that the data centre will require gargantuan amounts of water. It has also failed to properly scrutinise the developer's claims about water usage, which are roughly 10% of what will actually be needed for facilities of this size.

29. Failure to consider the impact on electricity availability and power in the area. There are already places in London where new build houses cannot be hooked up the grid because local data centres have taken all substation availability. This is obviously a higher risk when building a hyper-scale data centre campus. The council has failed to consider the impact such increased demand will have on the community and on electricity prices. It has also failed to consider the impact that the development will have on net zero obligations.

30. The reports have failed to properly consider the significance of the site re conservation area, ancient woodland, listed buildings, fenland, designations for mineral safeguarding and archaeological priority zones.

31. The council has failed to consider more important and critical nationally significant uses for the land – such as for UK food security (given that the site comprises 25 good quality arable fields, and 4 former working farms) or the generation of power – as the site is designated as suitable for wind energy development.

32. The council has failed to consider that technology will have likely moved on in 20 years' time, and that the need for more large data centres will likely be non-existent given that:

i. Computing power is increasing at stratospheric rates with more powerful components getting smaller so huge servers in vast data centres will no longer be required;
ii. New forms of AI are being pursued that will produce something more akin to actual AI, and will render large-language models and their resultant data centres defunct;
iii. The number of data centres currently being built and proposed are likely to mean supply outstrips demand;
iv. AI in its current iteration (which requires and has driven the mass expansion of data-centres) is far from profitable and short on ideas of how to make it turn a profit (the industry making a loss of circa $200 billion last year).

33. The reports and council have also failed to consider that even if the need for data centres is established (which is questionable), there is no need for the data centres to be placed together forming a hyper-scale facility. In fact, the negative impact of a hyper-scale facility outweighs the positives and exasperates the problems identified in this response.

Ecology Park

34. Failure to properly scrutinise the claims for the eco park and the promised increases in biodiversity. The council has entirely failed to consider the risk of pollution, and that the development will lead to huge initial habitat loss by destroying long-established hedgerow. The council have also failed to consider the impact of the decades' long construction phase.

35. Failure to give proper weight to the length of time it would take for the lost habitats to be replaced and that increasing (or even maintaining) wildlife biodiversity in the vicinity of a data centre is likely to be impossible. Birds and other animals are known to avoid data centre sites due to e constant humming and vibration and the light pollution.

36. Failure to consider that Havering residents are unlikely to benefit from or want to use an eco-park overshadowed by 7 story warehouses which hum and vibrate. The council have allowed the developer to consider everything that isn't build-out to be considered eco park, manipulating the actual size of the eco park.

Further Failings

37. Failure to consider health risks to nearby residents and visitors. The HSE provides that evaporative cooling towers (as will be used by the data centres) pose a risk of legionnaires disease, and that this can be spread 6km from the towers. This disease can prove fatal, and is more dangerous to those with weaker immune systems – such as the residents of the care home

		next door and children coming to use the park or visitor centre. They have also failed to consider the risk of forever chemicals, refrigerant and diesel pollution and high-powered electricity to visitors and residents. They have also failed to consider the health impacts of 24/7 noise and light pollution, humming and vibration on nearby residents. 38. Assurances have been made regarding the level of noise pollution, with promises to ensure that it does not exceed current levels. The council has failed to notice that this is impossible and that the developer's noise survey is wholly inadequate. The developer took readings from the roadside and concluded that the noise level was circa 45db. Residents have undertaken their own independent noise survey which measured noise on site for one week. This concluded that the baseline was 24db. Data centres emit 40-65db and generators 75db. The council have also failed to consider the noise profile and the fact that data centres cause noise pollution 24 hours a day, every day. 39. Failure to properly consider that the land is within flood zone 2 and 3 and is currently piped to drain the water from Fen Lane and Clay Tye into the river Mardyke. The council have given the developer carte blanche to make any drainage changes it sees fit without regard to the current drainage arrangement or the flood risk. Term Amendments 40. Notwithstanding the fact that it is clear the LDO should not be granted and this development should not go ahead, there are a number of issues with the terms which require amendment. 41. The terms should be amended so as to not provide that any development started before the expiry of the twenty-year period to be completed thereafter (Statement of Reasons 7.1). The construction should be completed within the 20-year time limit granted by the LDO. 42. The terms should not provide that development commenced before revocation or amendment of the LDO can be completed notwithstanding the withdrawal of the LDO (Statement of Reasons 10.3). This clause should be removed as it encourages unlawful development and increases the likely sum the council would be required to spend to reinstate the land if the LDO was revoked. All clauses within the LDO would be revoked alongside the LDO, rendering any work on the site unlawful development. 43. The s.106 terms should be amended to provide for improvements in the North Ockenden area, including mitigation for noise and light pollution and local facilities for the affected residents. 44. The s.106 terms should be amended to provide that jobs are actually reserved for Havering residents. It currently provides for only 20% of the workforce to be local and local is defined as within 10 miles of the site. Given the location of the site on the borough's boundary, this means that the provision would be satisfied by giving 20% of jobs to people outside of Havering. Data centres tend to provide a small number of jobs, with most of the roles in maintenance, security and cleaning. Therefore, the clause should provide that at least 50% of the jobs go to Havering residents, to ensure that Havering people get some benefit from the site and have a chance of getting the higher-level technical roles. 45. The s.106 terms should be amended to provide that more than 25% of contract procurement comes from Havering. 46. The visitors centre and ecology park should be free for all Havering residents. The s.106 only provides for free admission to the visitors centre for local school trips.
400	Network Rail	Thank you for consulting Network Rail (NR) on the above Local Development Order. As the Statutory undertaker and freeholder responsible for owning, operating, and developing Britain's railway infrastructure, NR reviews all planning consultations with the safety and Reliability of the operational railway as a priority, in line with our obligations under licence from the Department for Transport and the Office of Rail and Road. At this stage, NR has identified several matters associated with the proposed development which require further consideration and discussion with both the developer and the Local Planning Authority. Given the scale and complexity of the proposal, and the potential implications for the operational railway and associated infrastructure, NR considers it appropriate to provide this response as a holding position at this time. *Site Location* The proposed data centre site is located to the south of West Horndon railway station and to the east of the railway line and Upminster Station. Location plans are provided in Appendix 1 and Appendix 2 of this document. *Impacts on NR Infrastructure* Due to the scale of the proposed development, there is potential for impacts on NR infrastructure which may not be fully apparent at this stage. These include, but are not limited to: • Impacts on NR (non-station) assets • Increased use of road over rail bridges with limited capacity

NR therefore considers it essential that the full implications of the development are thoroughly assessed and discussed before a final position is reached.

Impact on Bridges

The development is likely to result in increased use of several road over rail bridges, including Ockendon Road Bridge (UPG/12) and Warley Street Bridge (FSS2/44). Whilst the site itself is not immediately adjacent to the railway, the proposed delivery, servicing, and operational movements associated with the development will place significant demands on road over rail bridges which are constrained in terms of width and/or load-bearing capacity.

1. *Warley Street Bridge (FSS2/44)*

It is noted that the delivery and servicing route for the development is proposed to pass over Warley Street Bridge (FSS2/44).

NR has received the results of a Section 117 structural assessment, which confirms that the bridge has a capacity suitable only for 7.5T vehicles.

As a result, the bridge is substandard for the proposed use. NR is in discussion with the Local Highway Authority (Essex County Council) regarding the introduction of a weight restriction and potentially a Temporary Traffic Regulation Order (TTRO) to manage this.

In line with Highway Standard CS 470 and NR standard NR/L2/CIV/035, NR may manage this structure through enhanced inspection and monitoring regimes until such time as NR can arrange works to meet its statutory liability of 24T. As works to this structure are not in the CP7 business plan (covering the period until 31/03/2029), any renewal of, or works to, the bridge, whether to restore full highway capacity or to provide greater capacity to accommodate abnormal loads associated with the development, would need to be fully funded by third parties.



Image 1: Warley Street bridge (FSS2/44)

2. *Ockendon Road Bridge (UPG/12) – Proposed Cycle and Shuttle Bus Links*

The proposals indicate that shuttle bus and cycle connections will be provided to Upminster Station, identified as the most accessible and best-connected station serving the development. The most direct route to this station is via Ockendon Road, crossing the railway at Ockendon Road Bridge (UPG/12).

NR notes that the bridge and extended sections of Ockendon Road on either side lack footways and there is no dedicated provision for cycling infrastructure. The existing bridge width and road layout are therefore unsuitable to safely accommodate the proposed level of pedestrian, cycle, and shuttle bus movements.

Replacement of the bridge with a wider structure should be considered, or alternative traffic management or routing options should be explored and discussed further.



Image 2: Ockendon Road Bridge

Holding Position and Future Engagement

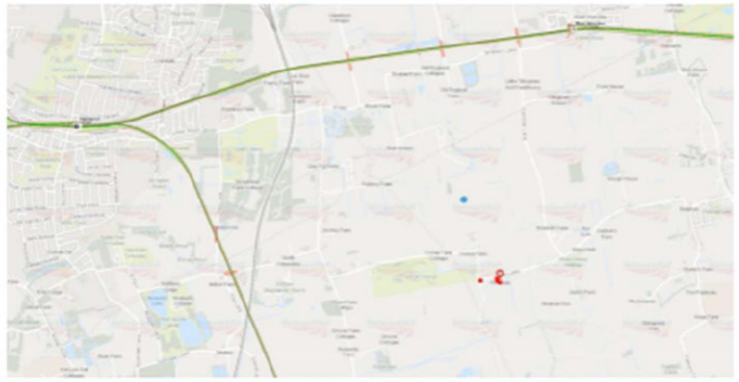
Given the significance of the issues outlined above, NR considers that further engagement is required before a detailed or final response can be provided. This letter should therefore be treated as a holding response, setting out the key areas of concern that warrant further discussion.

NR would welcome the opportunity to engage constructively with the developer and the Local Planning Authority to discuss these matters in more detail, clarify outstanding issues, and explore potential solutions. This approach will help ensure that any future response is informed, proportionate, and supports the safe and efficient operation of the railway.

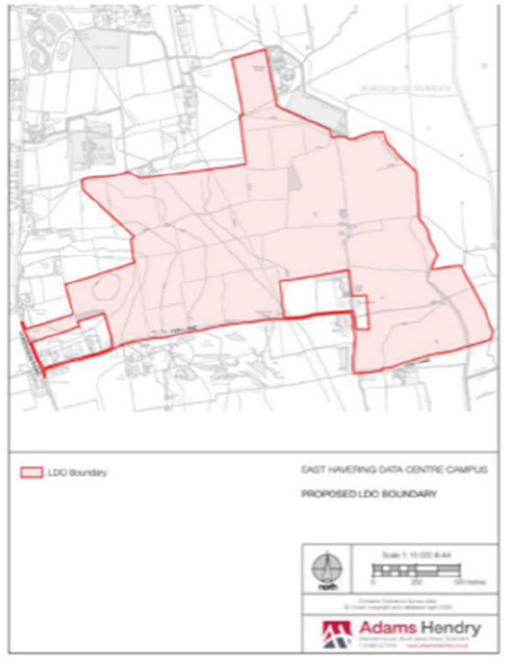
I trust the above sets out NR's current position on the LDO application. Should you wish to arrange further discussions or require clarification on any of the matters raised, please do not hesitate to contact NR.

Appendices:

Appendix 1: Screenshot of GEO-RIMM matching location of the LDO site



Appendix 2: Screenshot of Location Plan submitted with the LDO documents



401	Brentwood Borough Council	Thank you for the notification providing Brentwood Borough Council an opportunity to comment on the above. In replying to this type of consultation the Borough Council confines its formal considerations to strategic matters which could affect planning interests in this borough. In this case it is noted that the impacts are likely to be limited to vehicular movements and landscape impact. The closest part of the Campus site to the Brentwood boundary is part of the proposed 'Ecology Park'. It is approximately 1km from the boundary. The closest buildings would be approximately 1.5km from the boundary. The nearest residential properties within the borough would be over 2km from the site. These are located along Little Warley Hall Lane and Church Lane, Great Warley. This part of the boundary is primarily farmland with several large commercial sites off the A127 and Warley Street. The closest recreational site is Thorndon Country Park. A Landscape and Visual Impact Assessment has been submitted as part of the ES. This concludes that the most significant landscape and visual effects would be experienced within 500m of the

		site. The wireframes and photomontages included in Technical Appendices 15:2, 15:3 and 15:4 support this. It is considered that the proposal would not result in significant adverse landscape or visual effects on receptors within the Borough of Brentwood. The Ecology Park will provide opportunities to provide significant new planting which will provide further screening as it establishes. Table 15.2 in the LVIA chapter indicates that this will take a long time to establish. The first phase of tree planting is expected to only reach 6.7m by the end of the LDO and 9.7m by 10 years after that. It is vital therefore that new planting is provided as soon as possible and is appropriately maintained to ensure successful establishment. The site is primarily within farmland with a generally low ecological value. The scheme would not have any adverse ecological impacts on habitats or species within Brentwood. The large Ecology Park surrounding the site would help the scheme to exceed the mandatory 10% biodiversity net gain requirement. The Council would expect to see that all relative cumulative impacts in terms of transport movements are fully taken into consideration with appropriate weight given in any planning balance exercise undertaken.
402	Individual	FORMAL OBJECTION TO LDO0001.26 – EAST HAVERING DATA CENTRE CAMPUS Prepared in contemplation of potential statutory challenge (Judicial Review) _____ 1. Introduction and Status of this Representation This representation is submitted as a formal objection to LDO0001.26 and its associated draft Section 106 Heads of Terms. It is made on the basis that the Local Planning Authority ("LPA") would act unlawfully if it were to adopt the LDO in its current form, due to: • Failure to comply with the requirements of the National Planning Policy Framework ("NPPF") • Failure to properly apply statutory tests for planning obligations • Procedural unfairness in consultation • Irrational and/or inadequately reasoned decision-making These matters are raised expressly to preserve the right to pursue a claim for Judicial Review. _____ 2. Ground 1 – Unlawful Section 106 Obligations (Failure to Meet Regulation 122 Tests) Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) requires that planning obligations must be: • Necessary to make the development acceptable • Directly related to the development • Fairly and reasonably related in scale and kind These tests are reflected in paragraph 57 of the National Planning Policy Framework. 2.1 Failure of "Direct Relationship" The principal financial contribution (£6.924 million) is allocated to a dispersed portfolio of Green Belt sites across the borough . There is no evidence that: • These sites are functionally linked to the impacts of the development • They mitigate site-specific harms arising in North Ockendon The absence of a demonstrated spatial or functional nexus renders the obligations unlawful. _____ 2.2 Failure of "Fair and Reasonable Scale" The development's impacts (traffic, environmental harm, loss of openness) are highly localised in North Ockendon, yet: • Only minimal direct investment is allocated to that area (~£36k identified) • Substantially larger sums are directed to geographically unrelated locations This represents a clear failure of proportionality in scale and kind. _____ 2.3 Failure of "Necessity" Many of the listed projects (e.g. general park enhancements across the borough) are: • Desirable public benefits • But not necessary to make the development acceptable This is contrary to the principles established in: • Tesco Stores Ltd v Secretary of State for the Environment _____ 3. Ground 2 – Irrationality and Failure to Apply "Rough Proportionality" The LPA is required to ensure a rational relationship between impact and mitigation. In R (Welcome Break Group Ltd) v Stroud District Council, the Court confirmed that obligations must satisfy "rough proportionality." In this case:

		• Impacts are concentrated in North Ockendon • Benefits are dispersed across unrelated wards No intelligible planning justification is provided for this mismatch. Accordingly, the proposed mitigation strategy is: • Irrational (Wednesbury unreasonable) • Unsupported by evidence • Legally deficient _____ 4. Ground 3 – Procedural Unfairness (Failure to Consult Properly) There is no evidence that the community most affected—North Ockendon—was: • Specifically consulted on mitigation priorities • Given an opportunity to influence the allocation of Section 106 benefits This is contrary to the requirements set out in: • R (Moseley) v Haringey LBC Which establishes that lawful consultation must: • Occur at a formative stage • Include sufficient information • Allow meaningful response The failure to engage the most affected community renders the process procedurally unfair and unlawful. _____ 5. Ground 4 – Failure to Give Adequate Reasons / Lack of Transparency The LDO documentation: • Lists financial allocations • Fails to explain how locations were selected • Provides no methodology linking impacts to mitigation This constitutes a failure to give adequate reasons, contrary to principles in: • South Bucks District Council v Porter Without such reasoning: • Affected parties cannot understand the decision • Proper scrutiny is prevented _____ 6. Ground 5 – Material Considerations Ignored The LPA appears to have failed to properly consider: • The geographic concentration of harm in North Ockendon • The absence of proportionate local mitigation • The inequitable distribution of benefits Failure to take these into account constitutes an error of law. _____ 7. Consequences of the Identified Errors Taken cumulatively, the above failures mean that: • The Section 106 obligations are unlawful and unenforceable • The LDO is not supported by lawful mitigation • Any decision to adopt the LDO would be vulnerable to Judicial Review _____ 8. Requested Action In light of the above, it is requested that: 1. The LDO not be adopted in its current form 2. The Section 106 Heads of Terms be withdrawn and fundamentally redrafted 3. A lawful mitigation strategy be prepared which: o Demonstrates direct relationship to impacts o Prioritises North Ockendon proportionately

		o Provides transparent justification 4. A targeted, lawful consultation exercise be undertaken with the North Ockendon community _____
403	Environmental Law Foundation	LETTER OF OBJECTION TO EAST HAVERING DATA CENTRE 1. We are writing from the Environmental Law Foundation ("ELF"), a legal charity that assists communities with environmental concerns in the public interest. This is a formal letter of objection, on behalf of the local community group 'North Ockendon Residents Against Havering Data Centre' ("NORA"), to the draft Local Development Order ("LDO") which has been submitted for the East Havering Data Centre Campus proposal. This letter should be read alongside the letter sent from ELF dated 15th January 2026, which raised the early concerns that NORA had in respect of the impact that the development would have on the environment, heritage and local infrastructure, as well as the concerns about using a LDO for this type of development. 2. Unfortunately, Havering London Borough Council ("the Council") had originally only afforded a short time period for this consultation, 31 days to be exact. The consultation period also falls over Easter, further shortening the time available for response. In this context, ELF has made every effort to review the several thousand pages of technical evidence and produce a thorough response, but, unfortunately, neither ELF nor its experts have been able to review the material in its entirety. This letter summarises NORA's key objections to the LDO. 3. In summary, NORA strongly objects to this LDO principally for the following reasons: a. The short time frame of the consultation. b. The potential failure of the Council to comply with Regulation 64 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 ("the EIA Regulations"). c. The impact of the development on the Green Belt, the environment, and its wider surroundings d. The impact of the development on heritage assets e. The application overstates the needs case Consultation 4. The consultation originally was due to run from 6th March 2026 to 7th April 2026. This is a period of 31 days and just exceeds the 28-day statutory minimum under article 38(5) of the Town and Country Planning (Development Management Procedure) (England) Order 2015, and the 30-day minimum period under Reg. 19 of the EIA Regulations. 5. We note that, as of today, the Council has now extended the consultation period to 12 April. This is an inadequate extension of a mere 3 working days. This provides very little practical benefit, as it still falls over the Easter Holiday period and has not been given with enough notice to allow consultees to plan. Therefore, we still consider this to be an inadequate consultation period. 6. The Council will be aware of our concerns about the short consultation period, as ELF sent a letter dated 20th March requesting an extension. At the time of writing, the ELF have not had a response to this letter. 7. As noted above, article 38(5) requires that a local authority who is conducting a consultation must: a. Send a copy of the draft order and the statement of reasons to the consultees. b. Specify a consultation period of not less than 28 days; and c. Take account of all representations received by them during the period

		specified. 8. Notably, the 28-day time period is just a minimum, and it is, of course, within the Council's gift to extend this period. In fact, public law requires that a consultation must be undertaken at a time when proposals are still at a formative stage, that the consultation affords adequate information and time to allow participants to produce a proper and informed response, and that it involves a conscientious and open-minded consideration. The requirements of a lawful consultation are often referred to as the 'Gunning' Principles. 9. It is considered that the now 37-day period is woefully inadequate. First, the 28-day period is the statutory minimum, and applies to any type of LDO. Accordingly, the Council's only other LDO scheme of placing tables and chairs outside a Café in Romford Town Centre in 2010 was subject to the same statutory minimum. The current proposal is evidently of a vastly different scale, impact and investment, and it is indefensible for the consultation period to only be 9 days longer for a 400,000 sqm controversial development. The Council has no other experience of LDOs; however, it is not difficult to find examples where other Councils have extended the consultation period. For example, in 2025, the Royal Borough of Kensington conducted a 6-week consultation on an LDO regarding whether separate planning permission was needed to change existing windows in non-listed residential properties across the borough. 10.Second, the inadequacy of the period is further exacerbated by the fact that the consultation period overlaps with Easter. This reduces the time available for organisations and individuals to respond. The fact that the consultation period fell over Easter was considered at the Council Strategic Planning Committee on 3rd March 2026, where it was decided 3-3, that no more time would be allowed for the consultation period. The closeness of the vote underscores the evident problematic nature of the short consultation period. The extension does nothing to address this issue, as the Easter Holiday period will end for most on 13 April. 11.Thirdly, many local residents have reported that notices were not received until the following week of the consultation. This further reduced the time that members of the community had to consider the proposals. 12.Fourth, as has already been alluded to, the consultation documents run to several thousands of pages, and are themselves highly technical. Even the non-technical summary is not non-technical, and it would take significantly more time than has been afforded to obtain sufficient specialist input to have a reasonable opportunity to respond adequately to the proposal. 13.Finally, the Planning Advisory Service has produced guidance for councils preparing an LDO. The guidance repeatedly emphasises that best practice would be to engage early and continuously with local communities. The guidance notes that: *A fundamental component of developing and delivering an LDO is to ensure that there is effective engagement with all relevant stakeholders. This is likely to include….the local community and other interested parties* […] *Early engagement with the community, both to explain the objectives and to ensure that their input on ideas and aspirations are taken account of, is also very important. LPAs experience of LDOs is that engagement of the ward*

		Members early on in the process has often been key to successful two way conversations with the community reducing misunderstandings and promoting community aspirations for the site or area [...] *These are the formal legislative requirements and should supplement, not replace, the engagement that is needed with key stakeholders throughout the process* 14.The Council has taken a decidedly different approach. ELF has received no substantive responses to the main issues raised in our letter dated 15th January or to our email dated 20th March. 15.Furthermore, ELF made three requests in our letter from January under paragraph 69. These requests were for confirmation of the consultation period timings, a request for pre-application advice and requesting the Council to take Planning Enforcement against the applicant in light of clear planning control breaches on the site. 16.ELF did not receive a response to the issue of consultation or pre-application advice till 20 March and 25 March respectively, halfway through the consultation period and well outside the 20-working day threshold a response should have been provided by. To date, ELF is not aware of any enforcement action being taken against the applicant. 17.ELF notes the Council requested further detail on our EIR request for pre-application advice on 25 March. It is disappointing this was asked of us towards the end of the Consultation period, and it is unlikely the Council could have provided a response in a timely manner which would have informed our response. 18.Overall, it is unclear why there were such significant delays in responding to these relatively simple requests, and the delays rendered the responses provided by the Council unhelpful. 19.A lack of productive early engagement, alongside the scant 37 days of public consultation, and the size of the scheme have meant that the ELF and the wider public have not had time to produce an informed response. In simple terms, the consultation has been too short, has not allowed for intelligent consideration and response and has been undertaken at a stage when the proposals are not at a formative stage. The consultation that has been undertaken is contrary to the Gunning principles and unlawful. Potential Failure to Comply with Regulation 64 of the EIA Regulations 20.Reg. 32 of the EIA Regulations imposes duties on the Council in relation to Schedule 2 development for which a local planning authority proposes to grant permission by local development order. 21.Regulation 64(1) of the EIA Regulations requires that where an authority has a “duty under these Regulations, they must perform that duty in an objective manner and so as not to find themselves in a situation giving rise to a conflict of interest”. 22.Regulation 64(2) requires that, where an authority is bringing forward a proposal for development and will also be responsible for determining its own proposal, they “must

		make appropriate administrative arrangements to ensure that there is a functional separation, when performing any duty under these Regulations, between the persons bringing forward a proposal for development and the persons responsible for determining that proposal". 23.The practical requirements of Regulation 64 were considered in London Historic Parks and Gardens v Secretary of State for Housing, Communities and Local Government [2020] EWHC 2580 (Admin) at [94]. They require: a.The Council's duty under the EIA directive is to be undertaken by an identified internal entity with the Council, with the necessary resources and acting impartially and objectively b. Any person acting or assisting with the discharge of the functions under the EIA be prohibited from being involved in promoting or assisting in the promotion of the application for any development consent c. The prohibition of anyone involved in promoting or assisting in the promotion of the application for development consent from giving any instructions to, or putting any pressure upon, any person acting or assisting in the discharge of the functions of the Council under the EIA. 24.There is a statutory duty on the Council to perform its functions objectively. In R(Barbican Quarter Organisation Limited) v City of London Corporation [2026] EWHC 687 (Admin), where the City of London was both the applicant for planning permission and the decision-maker, the City of London produced a handling note on how to comply with reg. 64. This was published and included within the publicly available documents. No similar document has been produced, and, as far as ELF understands, there is no publicly available information that indicates the Council is aware of its duty under reg. 64, let alone how they plan to address their statutory duty. 25.Accordingly, ELF requests confirmation of how the Council has been handling their dual position under the LDO, how the Council has kept its two roles separate and how the Council has been complying with the statutory duties contained within regulation 64. 26.The lack of transparency to this point, paired with the Council's lack of response to NORA's concern about the pre-permission development, has also created a risk that any future decision will be tainted by apparent bias, due to the fact that the Council has failed to publicly separate the Council as 'applicant' and the Council as 'decision-maker' (see R(CPRE Somerset) v Somerset District Council [2022] EWHC 2817 (Admin) on apparent bias). 27.The failure of the Council on this front further demonstrates the Council's own inexperience with the LDO process and is indicative of the inappropriateness of the LDO procedure for this particular development. 28.Without prejudice to the points made above, ELF has in the short time available attempted to address the main planning concerns arising from the LDO. Green Belt 29.The extent of the harm to the green belt that this development proposes cannot be understated. It is substantial. It is welcomed that the non-technical environment

		statement notes that the development on this site is inappropriate, as it makes a strong contribution to the Green Belt, and that the development on the site could have a significant urbanising influence on adjacent Green Belt Land. 30.However, despite labelling it as 'substantial', it is apparent that the application underplays the full extent of the harm that this development will do to the Green Belt. This is not a small development by any measure, but will rather result in 340,000sqm data centre, with the Design Code suggesting that some buildings will be in excess of 35m AOD. 31.While there is no longer any requirement for an LDO to comply with Local Development Policies, PAS notes that: "Although a LDO does not have to be supported by a specific development plan policy, it will give it more strength if the policy intent is already set out and supported by evidence." 32.It is striking then that the Council's own Local Plan at 7.1.14 notes that "there is no planning justification for releasing land from the Green Belt". 33.The £6.924 million contribution to enhance Green Belt land elsewhere in the borough does not mitigate this harm. It is a financial payment that leaves the harm to the Green Belt at East Havering entirely intact while making modest improvements to other sites. The development presents a severe and permanent impact on some of the most functionally important greenbelt land in the borough. It is considered that the various benefits, that the scheme will provide do not outweigh this fundamental harm. Further, as will be addressed in due course, it is ELF's position that the application overstates the need for Data Centres. Impact on Nature 34.The scheme would result in a loss of 40.9ha of the Fairplay Farm SINC, of which only 26ha would be reinstated. Accordingly, the scheme would result in permanent loss of habitat. The adverse effects of the scheme on SINC have been majorly underplayed throughout the application. It seems to be the Applicant's position that loss of the SINC can be overcome through mitigation, and therefore, the ES affords no harm to the impact that the development has on SINC. This cannot be the case. 35.One of the primary forms of mitigation for this scheme is the re-provision of 26ha, to be reinstated through the ecology park. Only in ES chapter 4 does it become clear precisely which construction phases apply to the ecology park, and when it can be expected to be publicly accessible. Development has been earmarked to begin in April 2026, and the planting for the ecology park will only be completed by October 2036. The ES states that it is possible that in the future the ecology park will become its own SINC. However, this would be very far in the future indeed. The ES acknowledges that the landscaping may be newly planted and therefore at lower maturity levels during the construction phase. 36.Accordingly, much of the mitigation for the permanent loss of 40.9ha of SINC site, would not be realised, if realised at all, until a much distant future. The extent of this is seriously underplayed by the ES, and it seems that no harm is afforded to it. This is a mistake; the loss of the SINC is significant.

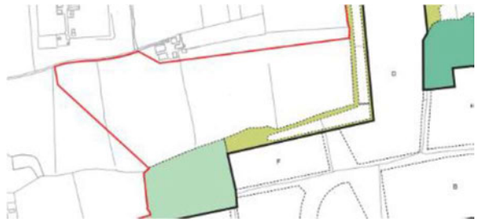
		Landscape and visual impact 37.The landscape and visual Impact of the development is substantial. The development proposes up to 15 warehouses that are up to 21m tall from finished floor levels. The ES systematically downplays the size and massing of this development. 38.The ES fails to consider the impact this will have on local establishments such as Top Meadow Golf Club, a popular venue space, which is on raised ground of Fen Lane. This establishment will be severely impacted by visual impact of this development. 39.It should also be noted that again, as with the above, the planting used to mitigate the site will be using young trees, which may take many years to provide any effective mitigation. 40.Further, the non-technical ES is devoid of any photomontages, which meaningfully convey the full impact of the development. It is consequently difficult for the general public to fully quantify the scale and the impact that this development will have on the wider environment, or to understand how the LPA proposes to mitigate the large warehouses. 41.If a longer consultation period had been provided, it may have been possible for the LPA to have addressed this before the consultation period ended; however, this is now unlikely to be the case. It is suggested that these photo montages are included at least for when the Committee votes on the issue so that Committee members are able to appreciate the significant adverse effects that would arise due to landscape and visual impact. Impact on designated heritage assets 42.The non-technical summary of the ES finds at 12.42 that “There are no heritage assets that would be directly affected by the proposed development however, the setting of some heritage assets would be affected”. 43.Article 38(12) of the Town and Country Planning (Development Management Procedure) (England) Order 2015 notes, however, that a local development order must not be made to grant planning permission “for a development affecting a listed building”. 44.The ES concludes that there would be harm to the significance of a listed building (Bury Farmhouse) due to the development’s impact on the setting of the asset. The NPPF notes that the setting of a heritage asset may make a positive contribution to the significance of the asset, and the setting of a listed building is an important part of how listed buildings are experienced. 45.It is clear that if there is harm to a listed building due to development in its setting, then that development ‘affects’ the listed building. ELF considers that the LDO process therefore cannot be used for this type of development, as the statutory scheme provides that an LDO cannot be used where the development would affect a listed building.

		46.In any event, the ES characterises the harm to Bury Farmhouse as being “considered to be in the mid-range of less than substantial harm”. This identified heritage harm must be given considerable importance and weight in accordance with the statutory duty in s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. The harm identified to the North Ockendon Conservation Area must also be given considerable importance and weight in accordance with the statutory duty in s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. 47.It is once again notable that neither the non-technical ES nor the whole ES includes any photos from the viewpoints, or any mock-ups of the potential layout of the data centre and how it would interact with the heritage sites. This makes it exceedingly difficult to understand and quantify the heritage impact. 48.This once again could have been addressed in a longer consultation period but also points towards the haphazard and predetermined nature of the application in this case. The consultation has not been formatted in such a way as to allow for meaningful engagement from all parties. Water abstraction and water usage 49.NORA has further concerns about the high volume of water that will be used by the data centre. The draft LDO and ES cap the potable water used for the cooling process at 62,560,000 litres per annum. It cannot be ignored that this is a large amount of water. Whilst it is commendable that the applicant has attempted to limit its reliance on Essex and Suffolk water, by also using rainwater to cool the data centres, the ES fails to note that Essex and Suffolk regions are under high water stress currently. 50.The Applicant attempts to underplay the potential demand of the site on potable water by relying on new strategic pipelines by Essex and Suffolk Water, such as reducing water usage and building a new winter storage reservoir. However, the Essex and Suffolk Water Resource Management Plan (“WRMP”), is a highly uncertain plan, that provides no certainties. For instance, the WRMP, itself notes that the reservoir is one potential plan, but it may not even go ahead. 51.The unsuitability of relying on WRMP is further exacerbated by the findings in the recent ‘Water Use in Data Centre and AI’ from the Government Digital Sustainability Alliance (GDSA)1. A couple of points of note are: a. First, AI’s water demand, particularly for cooling during heatwaves, directly intensifies the vulnerability of water systems. Indeed, while the site will use rainwater to offset its demand, it is obvious that during heatwaves, when the data centre will have its highest cooling requirements, it is unlikely to be able to rely on rainwater system. b. Secondly, as aforementioned the water mitigation strategy relies on the WRMP, but the report notes that there is a ‘critical oversight’ in current UK water resource planning. This is because the measures proposed by the water companies to meet the projected future deficit do not account for the water needs of novel infrastructure or data centres. The EA themselves have noted that water usage, and future demand from AI is highly uncertain and difficult to plan for. Indeed, if the Applicant’s need assessment is correct, there will be plenty more data centres that demand high levels of potable water that the water companies have not planned for.

		c. Finally, while it is welcome that the technical chapter 12 sets out the estimate for predicted water usage for this development, this is only an estimate. The report notes that there is a lack of sufficient data for comprehensive future planning, and the fact that there is “no reliable data on the quantity of resources used by data centres”, means that it is difficult to fully understand or quantify the impact that the future development may have. 52.There is limited detail on the methods of cooling within the ES. It is noted in that Hybrid Adiabatic Air-Cooled Chillers with free cooling capabilities have been targeted as the preferred cooling technology for the data centres in the ES. However, it is not clear whether this technology will be implemented and, if this is not implemented, what other technology may be used, and what subsequent impact this would have on water usage. 53.Water abstraction is mentioned scantily throughout the ES; it is only referred to once in the non-technical ES :“the scale of abstraction during construction would be negligible in terms of regional supply”. It is then noted that potable water supplies would be provided by Essex and Suffolk Water. The Applicant must confirm the extent of water abstraction that will take place. No decision can be made in the absence of this vital information, as it is not possible to fully understand the harm that this development proposes in this respect. 54.Finally, the development is located in a low-lying area and much of it is subject to flooding. Much of the proposed development will consist of large warehouse-type structures and will cause the ground to lose its ability to absorb rainwater, leading to runoff and flooding problems. The ES itself notes that, over the possible 17 years of construction, there will be increases in surface water runoff, changes to watercourses, and changes in water quality. This is a harm which the ES pays little heed to. Noise Pollution 55.The Applicant’s ES predominantly focuses on the fact that the noise does not exceed a certain decibel level. Unfortunately, it fails to address the fact that the noise it produces will be a continuous, low-level hum. This means that the noise will be present and will be heard even in quiet periods; this is acknowledged in the ES. Further, the Construction period will result in works being conducted at high levels of noise over the potential 17-year construction period. Needs Case 56.The applicant’s search for alternatives is flawed and self-serving. The Statement of Reasons at 12.11 notes that there are three other sites in Havering that meet the minimum requirements. The statement of reasons records that the other three sites were discounted because the current LDO site is “oven ready”, as it is well advanced in the planning process. This is evidently a flawed approach, as it would effectively discount all alternatives on every assessment unless there were already planning permission in place. The fact is that the site is not sequentially preferable compared to other sites that also do not have planning permission, as the site itself is not subject to any planning permission and is not at an advanced stage of planning. The reasons for discarding the three alternative sites do not stand up to scrutiny. 57.The statement of reasons assigns substantial weight to the contribution that the data

		centre would produce to the 'urgent need for data centre floorspace and the lack of alternatives'. However, such weighting does not align with previous Secretary of State decisions: a. Woodlands Park Landfill Site (APP/N0410/W/24/3347353) (9 July 2025) afforded significant weight to the contribution to meet data centre need. b. Land off Bedmond Road, Abbots Langley (APP/P1940/W/24/3346061) (12 May 2025) again gave significant weight to the data centres capacity to meet the need for data centres. c. Court Lane Industrial Estate, Iver (APP/N04010/W/24/3337981) (6 December 2024), again only gave significant weight to its contribution to need. d. Woodlands Park Landfill Site (APP/N0410/W/22/3307420) (30 October 2023) was a 163,000sqm data centre which was once again only given significant weight to meeting the need for data centres. 58.The Applicant's approach affords the contribution 'substantial' weight, which is unsupported by previous Secretary of State decisions, and is wrong. Conclusion 59.Overall, ELF accepts that there are benefits to this scheme. However, these benefits are not outweighed by the substantial harms outlined above. In addition, ELF has significant legal concerns about whether the Council can lawfully grant the LDO, given the bar on granting an LDO where it affects a listed building, the potential failure to comply with reg 64 of the EIA regulations 2017 and the unfair consultation. 60. The entire process has been conducted in a dismissive, haphazard manner that has demonstrated the Council's inexperience with the LDO and has highlighted the inappropriateness of the LDO for such a large scale and controversial scheme. The draft LDO should not be approved.
404	National Gas	No Objection: Under Condition National Gas Transmission operates a high-pressure gas pipeline that runs through the South East land parcels proposed for development. [Feeder 18 Matching Green to Tilbury] could be affected by AC and/or DC interference from the proposed installation. The pipeline has a land easement in operation of 12.2 metres either side of the pipeline. No development, construction or landscaping is permitted within the easement without formal written approval from National Gas Transmission. Under the Pressure System Safety Regulation 2000 and Pipeline Safety Regulations 1996 NGT have legal obligations to ensure the safety and structural integrity of the gas transmission pipeline are maintained, and the risks to public safety remain within acceptable levels at all times. IGEM/TD/1 Edition 6 recommends that all sensitive locations (Visitor centre) must be located a minimum of 4 x BPD from a High-Pressure Pipeline. National Gas Transmission will not object to the development/installation provided the following conditions are applied: Prior to commencement of works on site (including site clearance, preparatory works, or delivery of materials) an Asset Protection Plan covering the electrical impact assessment has been carried out and approved in writing by the Local Planning Authority, in consultation with National Gas Transmission (NGT). The Electrical Impact Assessment shall include, but not be limited to:

		Details of the proposed installation, proposed earthing system, cable routing and configuration. A detailed analysis of electrical impact on the existing NGT infrastructure, under both normal and fault conditions, taking into account soil resistivity surrounding the pipeline, and where appropriate AC harmonics and filtering. Calculations to demonstrate the separation distances for cables and earthing system will not cause unacceptable levels of AC/DC interference to NGT infrastructure. Electrical risk assessment which confirms the touch and step potentials under normal and fault conditions remain within acceptable limits. Mitigation measures where necessary to address any unacceptable impacts. This shall include installation of additional monitoring equipment or redesign of the earthing arrangement of the installation where necessary. Confirmation from NGT the assessment is satisfactory and complies with all relevant standards and specifications, and that any required mitigation has been agreed. The development shall thereafter be carried out in full accordance with the approved plan and any protection measures shall be installed and maintained for the duration as agreed with NGT which may be throughout the lifecycle of installation. Please note that any costs incurred by NGT as a result of this project is recoverable from the developer. This includes, but is not limited to: NGT's legal undertaking. Administration hours (Engineering, Land Rights, and Legal). On site monitoring (physical works in the vicinity of the pipeline). Cathodic protection surveys. Additional monitoring equipment (cathodic protection test posts, electrical resistance probes, data loggers etc). Relocation of NGT assets to accommodate the installation. Mitigation measures necessary to address unacceptable issues such as excessive interference.
405	Individual	To the Havering Strategic Planning Committee, I am writing as a resident of South Ockendon [redacted] to express my STRONGEST POSSIBLE OBJECTION to the proposed East Havering Data Centre Campus. While this development is being spearheaded by Havering Council, it is the residents of the Ockendon area who will bear the brunt of the negative impacts, with zero tangible benefit to our community. My objections are based on the following critical points: 1. Lack of Consultation for Thurrock Residents It is a disgrace that the residents of South Ockendon have been conveniently left out of the loop. While Havering residents have been included in discussions, the people of Thurrock—who live right on the doorstep of this site—remain largely unaware of the scale of this proposal. This feels like a deliberate attempt to bypass the very people who will be most impacted by the construction and operation of this site. 2. Unacceptable Traffic Volume The road network in Ockendon is already at a breaking point. Adding hundreds of daily HGV movements and over 1,000 staff journeys to B-roads like Ockendon Road and Fen Lane is negligent. The "mitigation" of widening Fen Lane is purely for the developer's benefit and does nothing to solve the inevitable gridlock and safety risks to our residential streets. 3. Constant Noise Pollution The requirement for 24/7 industrial cooling creates a permanent low-frequency "hum" that will destroy the peace and quiet of our neighbourhood. At my property on Cruick Avenue, we expect to be subjected to a constant drone that standard acoustic barriers cannot fully eliminate. This is an industrial noise being forced upon a residential and rural setting. 4. Destruction of the Countryside (Eyesore) This project is an attack on our Green Belt. Replacing open fields and natural views with massive, 20-metre-high industrial warehouses is a visual disaster. Calling this an "Ecology Park" does not hide the fact that you are turning our countryside into a concrete industrial estate. 5. Border Injustice

		It is fundamentally unfair that Havering Council intends to collect millions in annual business rates while the residents of South Ockendon (Thurrock) suffer the noise, the traffic, and the loss of green space. We are being asked to sacrifice our quality of life for a financial windfall that we will never see. I urge the committee to listen to the people who actually live here. This is the wrong project in the wrong place. I formally request that this Local Development Order be rejected.
406	NGET	The London Borough of Havering Consultation on the East Havering Data Centre Campus Draft Local Development Order ("LDO") Updated Representation from National Grid Electricity Transmission plc ("NGET") Dear Sir / Madam, NGET owns, maintains, and operates the electricity transmission network throughout England and Wales. Within the vicinity of North Ockendon, NGET operate the Warley Substation and are due to take forward the promotion of expanded electricity substation infrastructure in vicinity of the LDO proposals. NGET welcomes the opportunity to comment on the draft LDO for proposed East Havering Data Centre Campus, which is in the vicinity of its Warley site, as well as its existing infrastructure regarding the ZB275kV overhead line that traverses the site. NGET makes no comment on the merits of the proposal and limits this representation purely to matters of substance in the consultation documents. The comments below have been revised following a meeting with LB Havering representatives, where the matters set out below were discussed in detail. NGETs updated position has been annotated accordingly. We refer to the following draft LDO documents on which we limit our comments: 1. Draft Local Development Order Drawings We have reviewed Appendix 1: LDO Site Boundary Plan and Appendix 2: LDO Plans 1-6. We are concerned that the area previously earmarked purely for cable easements is labelled inconsistently (or not at all) across the suite of plans.  *We request clear and consistent identification of this area throughout the entire suite of LDO plans to avoid ambiguity.* June 2026 Updated Position: The Local Planning Authority (LPA) has confirmed that the area reserved for the power connection is shown in Figure 1.1 (Spatial Development Framework) of the Design Code. The LPA will also add the area reserved for power connection to the key on Figure 1.2 (Land Use Plan) in the Design Code, for consistency. NGET is satisfied with this approach and has no further comments. 2. Design Code *NGET owns and operates overhead line assets within the LDO boundary, being the ZB 275kV overhead line, which contain the two Tilbury – Warley circuits, and pylons ZB038-040. Paragraphs 1Q.2 and 1Q.3 of the Design Code document set out the safeguards to be secured for works authorized by the LDO which will take place in proximity to NGET's apparatus.* *We consider the current explanation to be insufficient in setting out the nature and extent of the protections that should apply, particularly in ensuring that existing assets as adequately protected and to ensure compliance with the relevant safety standards. NGET invites discussion by the Local Planning Authority to agree the appropriate level of detail regarding safeguards for its apparatus, so that these can be robustly and accurately incorporated into the Design Code.*

		June 2026 Updated Position: The LPA has provided clarity in terms of the standards set out in the Design Code which reference development needing to comply with National Grid's '*Third-party guidance for working near National Grid Electricity Transmission Equipment'*, Technical Guidance Note 287 or as subsequently amended. Reference is also made to the Electricity Safety, Quality and Continuity Regulations 2002. NGET is satisfied with the above inclusions which ensure that development on the LDO site maintains the appropriate protection from retained assets, including compliance with relevant standards for works proposed within close proximity of such apparatus e.g. ensuring that any proposed buildings must not be closer than 5.3m to the lowest conductor. As the LDO includes an Ecology Park and large areas of landscaping/planting, NGET would like to request that only slow and low growing species of trees and shrubs are planted beneath and adjacent to the existing overhead line to reduce the risk of growth to a height which compromises statutory safety clearances. NGET would also like to point out that drilling or excavation works should not be undertaken if they have the potential to disturb or adversely affect the foundations or "pillars of support" of any existing tower. These foundations always extend beyond the base area of the existing tower and foundation ("pillar of support") drawings can be obtained from NGET. NGET has no further comments to make in relation to this matter. 3. Green Belt Assessment Report and Statement of Reasons conclusions on Green Belt *The Council's Green Belt Assessment concludes that the land on which the proposed data centre campus would be developed make a very strong contribution to Green Belt purposes A (checking unrestricted sprawl of large built-up areas) and C (safeguarding the countryside from encroachment) and a moderate contribution to Green Belt purpose B (preventing neighbouring towns merging into one another). As such it concludes there is deemed to be a Very Strong impact on the local Green Belt.* *On that basis, the Council can conclude in the Statement of Reasons that the suite of mitigation to be secured in the proposed 106 agreement for the LDO is justified and meets the required planning obligation policy tests.* *NGET is surprised by the conclusions drawn in the Councill's Green Belt Assessment as to the level of beneficial contribution to the five purposes of the Green Belt provided by the LDO land and does not support the conclusions drawn by the Council's instructed consultants.* *NGET observe that the Council's Green Belt Assessment states that the "higher, western part of the site is to remain open and undeveloped, other than for the purposes of strategic cycle and pedestrian routes……the northwestern part of the site will contain electricity cables connecting the development to Warley substation. The land will remain in its current use" (see page 23). NGET would like to state that this is incorrect as NGET intends to construct a new 400kV substation in this area, therefore the land will not remain in its current use. This development is referenced in ES Chapter 16 (Cumulative Effects), Appendix 5.5 (Cumulative Schemes).* June 2026 Updated Position: There is no further action on this matter. 3. Power Report *NGET are generally content with the narrative in this Report.* *However, NGET do however wish to underscore that Table 4.1 contains the Noveus summary of GSP status, which has not been verified by NGET.* June 2026 Updated Position: There is no further action on this matter. 5. Section 106 Heads of Terms *We note that that the Ecology Area is defined as all areas outside of the Build Zones. However, this does not accurately reflect the white land assigned for power connections to nearby electricity substation infrastructure. The final heads of terms and any completed Section 106 agreement should accurately describe and accommodate the specific purpose in the LDO of this area.* *We note that same cable easement area also overlaps with the area assigned under the heads of terms to skylark mitigation. However, in that regard, we would be concerned that these purposes are inconsistent. Whilst the heads of terms reference such other "alternative suitable location," we would query whether that should be the default preference. It would be unfortunate if skylark mitigation interfered with the delivery of critical electricity transmission and distribution infrastructure on which the data centre proposals are ultimately reliant.* June 2026 Updated Position: The LPA has agreed that the description of the ecology area within the Heads of Terms is not fully aligned with the description and plans within the Draft LDO. The LPA has agreed that this is clear in the final wording of the Section 106 agreement. NGET is broadly content with the wording of the draft Section 106 clause, provided it includes a requirement for skylark mitigation to be secured at an appropriate alternative location should it not be feasible to deliver this within the area currently identified.

		6. Statement of Reasons *Paragraph 4.9 refers to the environmental context. NGET notes that the description of the power lines crossing the site is incorrect. The overhead line that traverses the site in a northwest – southeast direction is the NGET ZB 275kV overhead line. The other overhead line that traverses the site in an east-west direction is a UK Power Networks overhead line.* June 2026 Updated Position*:* There is no further action on this matter. Conclusion NGET confirms that it has no further comments to make at this stage and looks forward to continued engagement with the Council as the Local Development Order progresses.

Letter Ref. **CLI0600/L1/Rev.A**

Baseline Noise & Vibration Monitoring Technical Note

Top Meadow Golf Club and [redacted], Fen Lane, North Ockendon, Upminster RM14 3PR

03 August 2024

Letter prepared for:
Top Meadow Golf Club and Home Farm

Letter prepared by:
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Noise & Vibration Assessment Summary

Noise and Vibration Survey Details:

Appendix A1 contains the noise and vibration survey details, including information about personnel, instrumentation used, calibration details, calibration procedure, uncertainty, equipment operation time and dates, as well as weather conditions.

Appendix A2 displays the tested locations at *'Top Meadow Golf Club'* and *'Home Farm'*, highlighted in Figures 1-5.

Background Noise Monitoring Results (two locations tested, 7-day duration including Weekend):

Appendix A3 and Appendix A4 present the background noise data at Locations U1 & U2, respectively, in graph format at *'Top Meadow Golf Club'* and *'Home Farm'*. The unattended measured day ambient noise level $L_{Aeq,16\ hours\ (daytime)}$ and $L_{Aeq,8\ hours\ (night\text{-}time)}$, as well as the background noise levels L_{A90} during the day and night at Location U1 (Top Meadow Golf Club) and Location U2 (Home Farm) are summarised in the tables below (all adjusted for free-field conditions).

	Ambient Noise Levels		Background Noise Levels	
	Day 07:00 to 23:00 ($L_{Aeq,16hr}$, dB)*	Night 23:00 to 07:00 ($L_{Aeq,8hr}$, dB)*	Day 07:00 to 23:00 ($L_{A90,T}$, dB)**	Night 23:00 to 07:00 ($L_{A90,T}$, dB)**
Location U1 – Top Meadow Golf Club:	48	47	**24**	**24**
Location U2 – Home Farm:	50	47	**25**	**25**

**** Noise levels adjusted for free-field conditions.***
***** Lowest $L_{A90,T}$ levels measured during the day and night.***

Background Vibration Monitoring Results (one location tested, 3-day duration including Weekend):

Appendix A5 displays the background vibration data at Location U3 in graph format at [redacted]. The unattended measured day background vibration levels mms^{-1} (day and night) at Location U3 (Home Farm) are summarised in the table below.

	PPV Vibration Noise Levels	
	Day 07:00 to 23:00 (mms^{-1})*	Night 23:00 to 07:00 (mms^{-1})*
Location U3 – [redacted]	**0.05**	**0.05**

**** Lowest mms^{-1} levels measured during the day and night.***

Conclusion:

Noise: To minimise noise impact, the proposed data storage development must ensure that commercial/industrial equipment noise levels are below the measured background noise levels above. The maximum target noise levels according to British Standard BS 4142:2014+A1:2019 (Appendix B2) are:

- ≤24 dB $L_{Ar,Tr}$ at 1 metre from the nearest window at Top Meadow Golf Club; and
- ≤25 dB $L_{Ar,Tr}$ at 1 metre from the nearest window at Home Farm

Vibration: After conducting background vibration monitoring at Home Farm, this data can serve as a baseline for future construction vibration activities, ensuring compliance with the vibration limit of 1.0 mms^{-1} specified in British Standard BS 5228-2:2009+A1:2014 (see Appendix B3).

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Appendix A – Noise & Vibration Survey Details and Result Graphs

Appendix A1 – Noise & Vibration Survey Details

Personnel present:

[redacted] – Climate Acoustics

Instrumentation used and calibration info:

Svantek 971A & Svantek 971 – Sound Level Meters (**calibration certificates available upon request.)*.

AVA M80 – Vibration Level Meter (**calibration certificates available upon request.)*.

Larson Davis CAL200 – Calibrator (**calibration certificates available upon request.)*.

Climate Acoustics Calibrated Equipment	
Unattended Noise Meter (Svantek 971A) – Location U1	
Class 1 Sound Level Meter	Svantek 971A – Serial Number 127611 (Date of Calibration: 15/03/2023*)
Microphone	ACO 7152E – Serial Number 82011 (Date of Calibration: 15/03/2023*)
Preamplifier	Svantek SV18A – Serial Number 130497 (Date of Calibration: 15/03/2023*)
Unattended Noise Meter (Svantek 971) – Location U2	
Class 1 Sound Level Meter	Svantek 971 – Serial Number C111649 (Date of Calibration: 04/07/2023*)
Microphone	ACO 7052E – Serial Number 78177 (Date of Calibration: 04/07/2023*)
Preamplifier	Svantek SV18 – Serial Number 32165 (Date of Calibration: 04/07/2023*)
Unattended Vibration Meter (AVA M80) – Location U3	
Vibration Meter	AVA-INS486 – Serial Number 10715 (Date of Calibration: 23/11/2022*)
Geophone	AVA-INS801 – Serial Number 6024 (Date of Calibration: 23/11/2022*)
Calibrator (Larson Davis CAL200)	
Calibrator	Larson Davis – CAL200 - Serial Number 6003 (Date of Calibration: 27/10/2023*)

Calibration procedure:

The calibration procedure before and after the noise survey, the Svantek 971A & Svantek 971 sound level meters were calibrated using the Larson Davis CAL200, and no significant drift was measured before and after the survey (accuracy within ±0.3 dB).

Uncertainty:

For accurate measurements, the noise and vibration monitoring equipment is calibrated by traceable lab calibration:

- Class 1 sound level meters and microphones are calibrated once every two years.
- The vibration level meter and geophone are calibrated once every two years.

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- a Class 1 calibrator is calibrated once every year.

Note: Measurements are taken with a Class 1 sound level meter, with a typical margin of uncertainty of +/- 1.1 decibels due to equipment tolerances. Calculations for noise prediction are based on experience and factors such as distance, line of sight, and reflections. The AVA M80 vibration meter was positioned with the X-axis parallel to the proposed site, the Y-axis perpendicular to the proposed site, and the Z-axis aligned vertically.

Equipment operation times and dates:

11 am on Thursday 18th July 2024 to 12:45 pm on Friday 26th July 2024.

3 pm on Friday 26th July 2024 to 2:15 pm on Monday 29th July 2024

Weather conditions:

Weather conditions during the operation of noise monitoring equipment.

Date	Temperature (°C)	Weather Conditions	Wind
Friday 18 July 2024	18 to 27 Degrees	Cool/ Warm/ Hot. Dry. Sunny, Scattered Clouds/ Passing Clouds/ Clear.	**Calm to Gentle Breeze** **(0-5m/s).**
Saturday 19 July 2024	15 to 31 Degrees	Cool/ Warm/ Hot. Dry. Sunny, Clear.	**Calm to Light Breeze** **(0-3m/s).**
Sunday 20 July 2024	17 to 23 Degrees	Cool/ Warm. Dry/ Wet. Partly Sunny, Broken Clouds/ Passing Clouds/ Overcast and Occasional Drizzle.	**Light Air to Gentle Breeze** **(1-5m/s).**
Monday 21 July 2024	16 to 22 Degrees	Cool/ Warm. Dry/ Wet. Partly Sunny, Clear/ Scattered Clouds/ Broken Clouds/ Mostly Cloudy/ Overcast and Occasional Drizzle.	**Light Breeze to Gentle Breeze** **(3-5m/s).**
Tuesday 22 July 2024	13 to 24 Degrees	Cool/ Warm/ Hot. Dry. Partly Sunny, Clear/ Passing Clouds/ Mostly Cloudy/ Broken Clouds/ Overcast.	**Calm to Moderate Breeze** **(1-8m/s). Note: Moderate breeze between 9 am to 6 pm.**
Wednesday 23 July 2024	17 to 24 Degrees	Cool/ Warm/ Hot. Dry/ Wet. Partly Sunny, Clear/ Partly Cloudy/ Passing Clouds/ Mostly Cloudy/ Overcast and Occasional Drizzle.	**Calm to Gentle Breeze** **(1-5m/s).**
Thursday 24 July 2024	15 to 25 Degrees	Cool/ Warm/ Hot. Dry. Sunny/ Partly Sunny, Clear/ Passing Clouds/ Scattered Clouds/ Broken Clouds/ Overcast and Occasional Light Rain.	**Calm to Gentle Breeze** **(0-5m/s).**
Friday 25 July 2024	16 to 20 Degrees	Cool/ Warm. Dry/ Wet. Partly Sunny, Clear/ Fog/ Low Clouds/ Mostly Cloudy/ Overcast and Occasional Clouds	**Light Breeze to Gentle Breeze** **(3-5m/s).**

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Appendix A2 – Noise & Vibration Survey Locations

The three survey locations at Top Meadow Golf Club and Home Farm, Fen Lane, North Ockendon, Upminster RM14 3PR, with the unattended noise and vibration measurements completed outside at the nearest noise-sensitive receptors and equivalent to the location of the nearest noise-sensitive receptors.

The Google Earth™ image in Figure 1 below shows the nearest receptors considered in this survey.

Figure 2 shows the Google Earth™ image of the unattended sound level meter (Location U1, Figure 3) at the equivalent location of the nearest noise-sensitive receptor at Top Meadow Golf Club and the unattended sound level meter (Location U2, Figure 4) and vibration meter (Location U3, Figure 5) locations at the nearest noise-sensitive receptor at Home Farm.

Figure 1 – Google Earth™ Image showing the nearest noise-sensitive receptors



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Figure 2 –Unattended Noise & Vibration Measurement Locations at the Nearest Noise-Sensitive Receptors and Equivalent of the Nearest Noise-Sensitive Receptors (Source: Google Earth™)

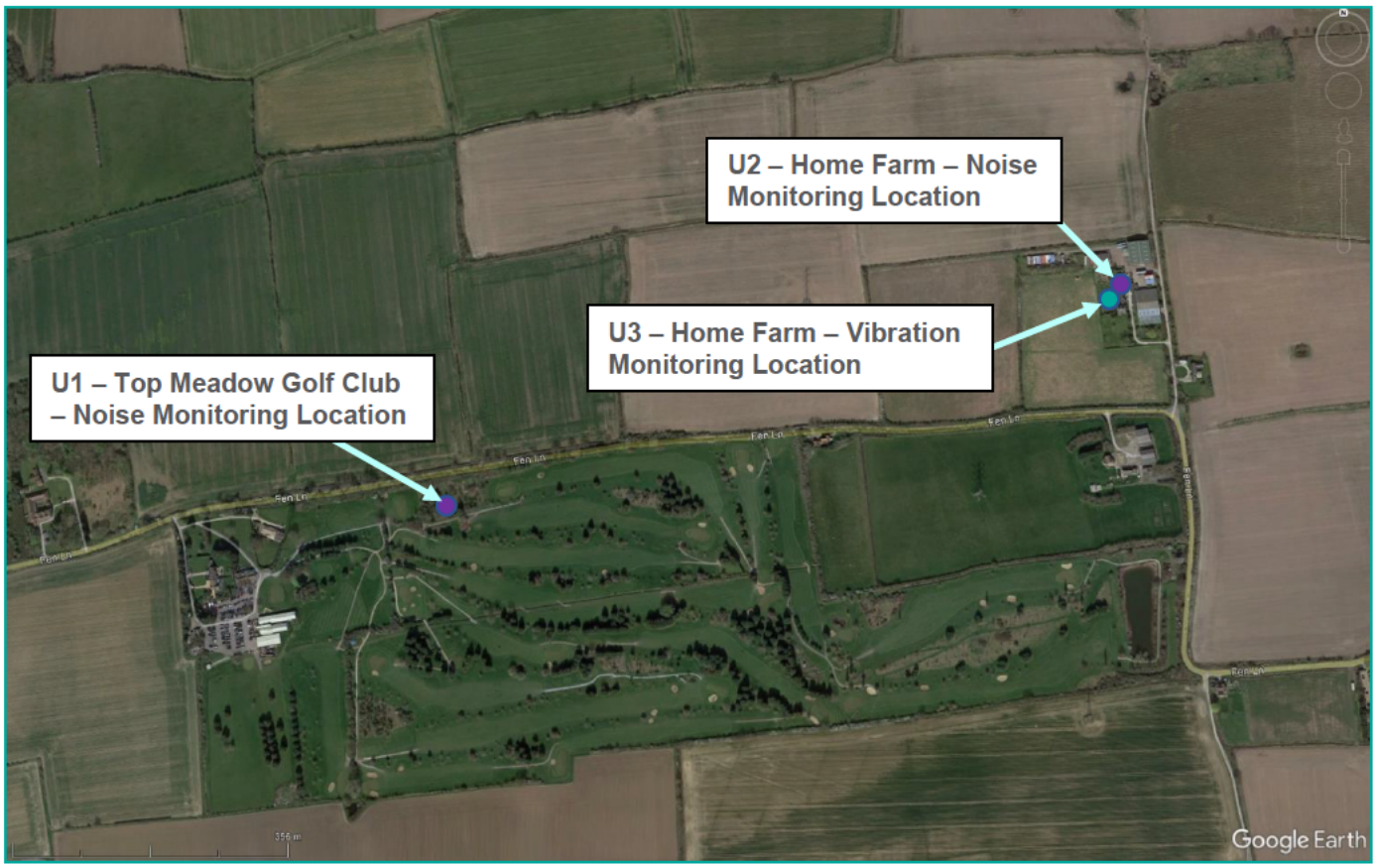

Figure 3 – Noise Monitor Location U1 – Top Meadow Golf Club



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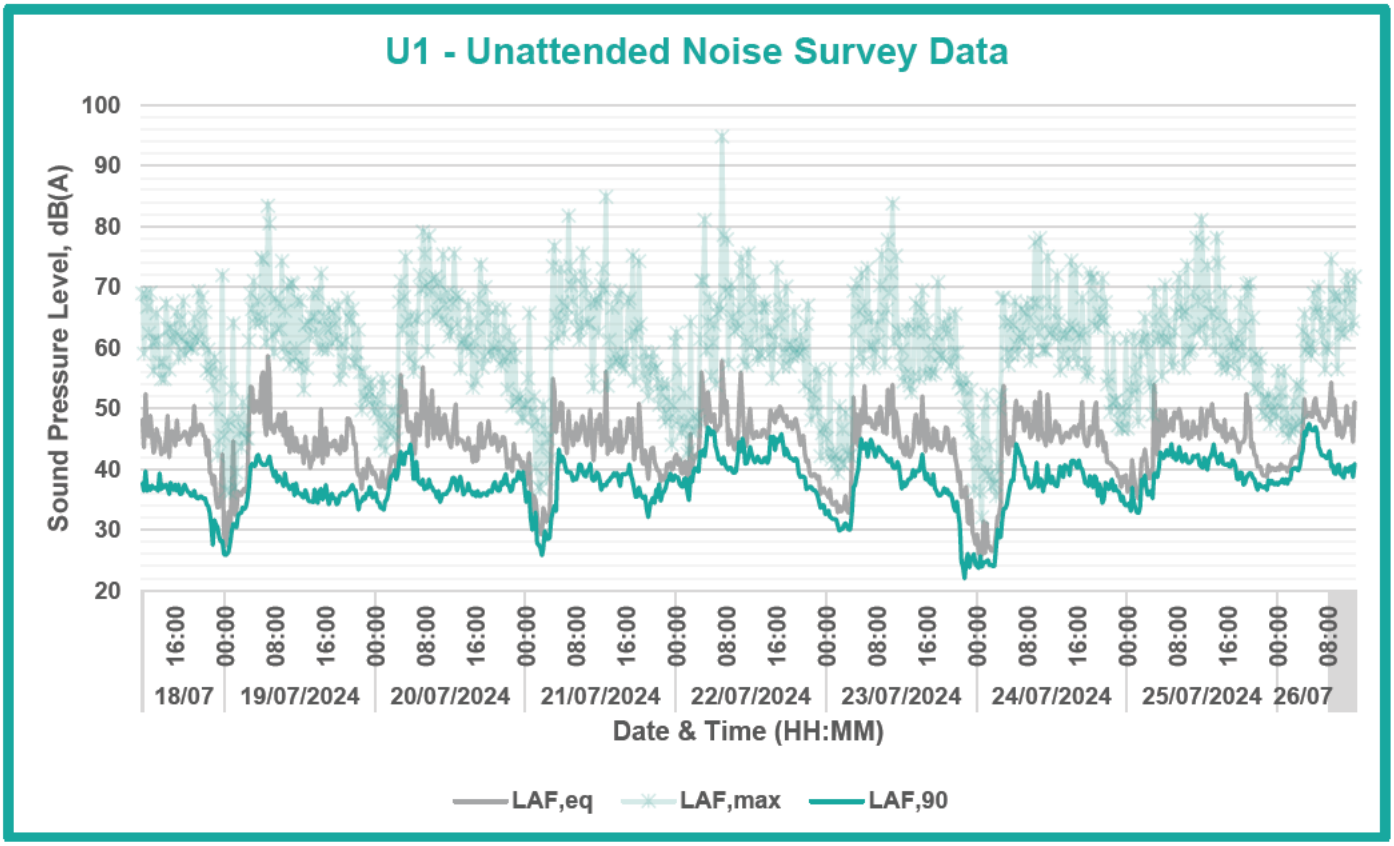
Appendix A3 – Location U1 Noise Survey Graph – Top Meadow Golf Club



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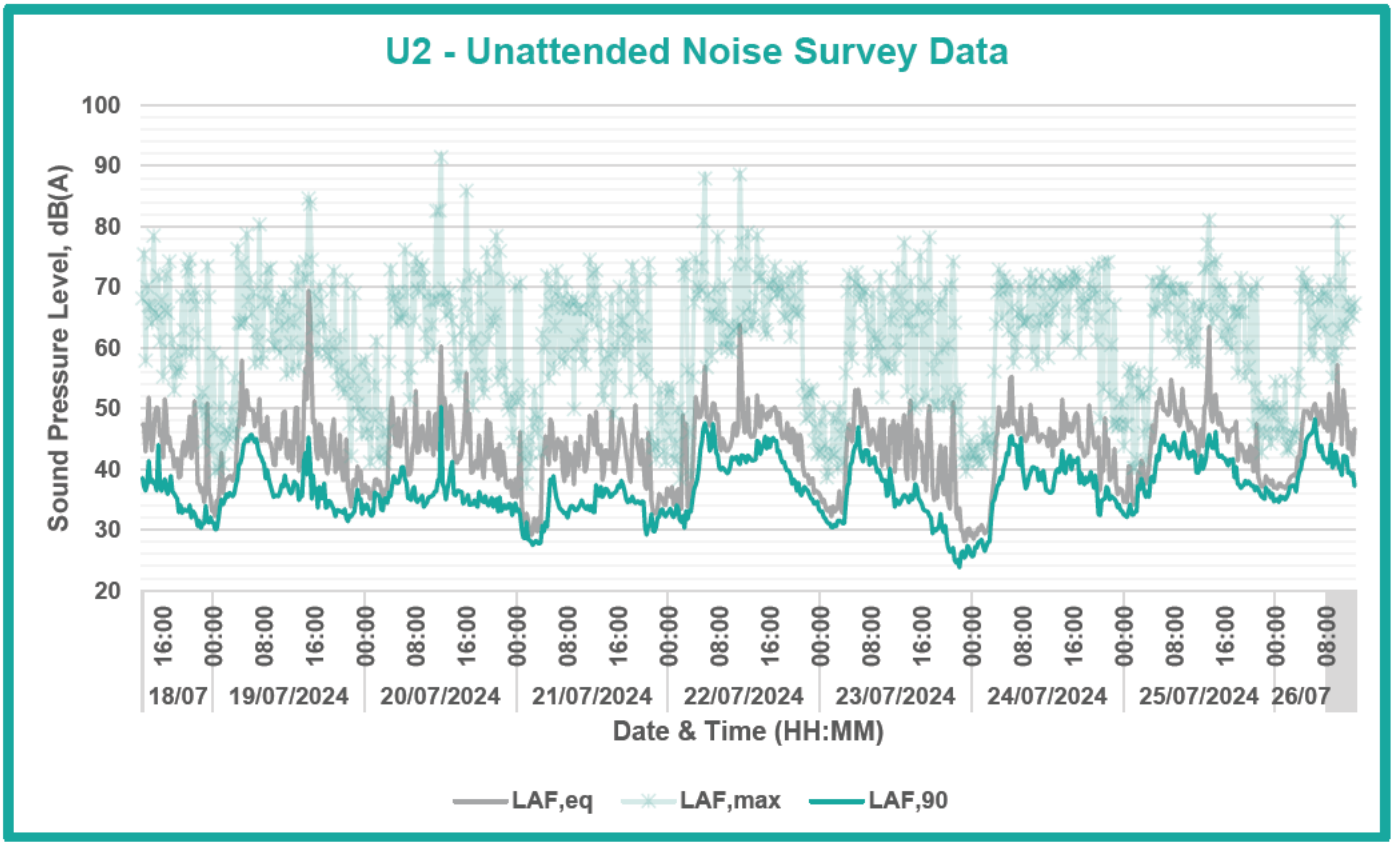
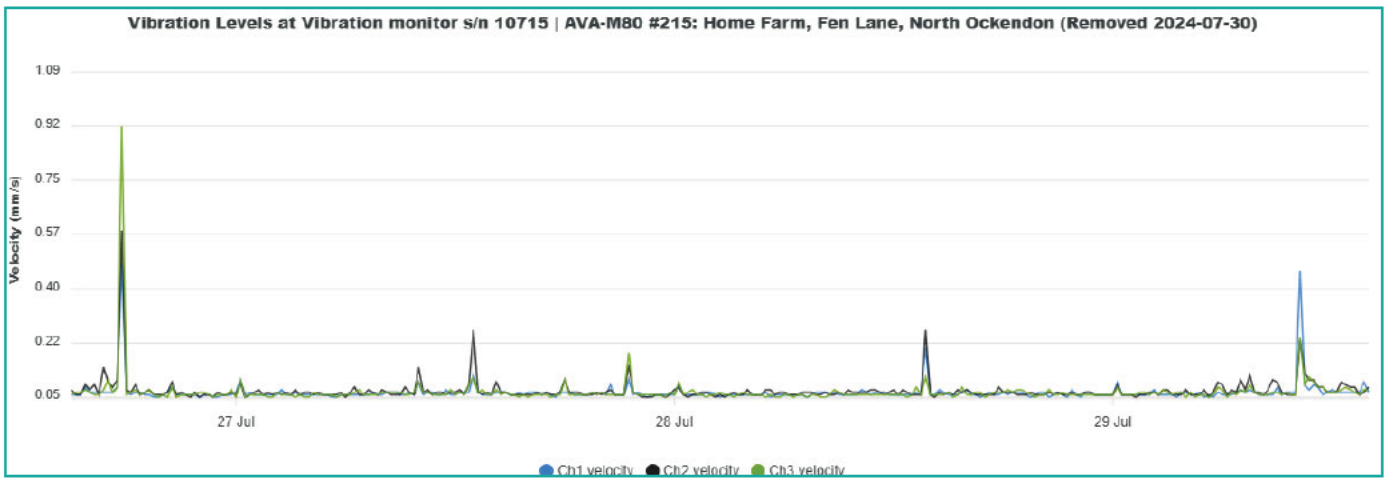
Appendix A4 – Location U2 Noise Survey Graph – Home Farm



Appendix A5 – Location U3 Vibration Survey Graph – Home Farm



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Appendix B – Internal Residential Noise Criteria

Appendix B1 – British Standard BS 8233:2014 – Guidance on Sound Insulation

Residential Internal Design Criteria

Reference is made to internal design criteria in British Standard BS 8233:2014 *'Guidance on Sound Insulation and Noise Reduction for Buildings'* contains guidance for internal design criteria, as shown in the following table.

Table C5. Indoor ambient noise levels for dwellings (Table 4 of BS 8233:2014).

Activity	Location	07:00 to 23:00	23:00 to 07:00
Resting	Living room	35 dB $L_{Aeq,16\text{-}hour}$	-
Dining	Dining room/area	40 dB $L_{Aeq,16\text{-}hour}$	-
Sleeping (daytime resting)	Bedroom	35 dB $L_{Aeq,16\text{-}hour}$	30 dB $L_{Aeq,8\text{-}hour}$

Appendix B2 – British Standard BS 4142:2014+A1:2019:

British Standard BS 4142:2014+A1:2019 *"Methods for Rating and Assessing Industrial and Commercial Sound"* is used to assess the potential for adverse impact due to an industrial or commercial noise source at the relevant noise-sensitive commercial or residential property. The proposed or existing noise source levels are measured/calculated and compared to the existing background noise level (L_{A90}).

Depending on the noise source characteristics (tonal, intermittent, impulsive, or other), the noise source is given a rating noise level (penalty additions) and compared to the *'typical'* background noise level (during proposed operating hours). The significance of the proposed or existing noise source can then be given a likelihood of adverse impact, which follows British Standard BS 4142:2014+A1:2019 advice:

"The significance of sound of an industrial and/or commercial nature depends upon both the margin by which the rating level of the specific sound source exceeds the background sound level and the context in which the sound occurs.

- ***A difference of around +10 dB or more is likely to be an indication of a significant adverse impact, depending on the context.***
- ***A difference of around +5 dB is likely to be an indication of an adverse impact, depending on the context. The lower the rating level is relative to the measured background sound level, the less likely it is that the specific sound source will have an adverse impact or a significant adverse impact.***
- ***Where the rating level does not exceed the background sound level, this is an indication of the specific sound source having a low impact, depending on the context."***

"Subjective method

Tonality

For sound ranging from not tonal to prominently tonal the Joint Nordic Method gives a correction of between 0 dB and +6 dB for tonality. Subjectively, this can be converted to a penalty of 2 dB for a tone which is just perceptible at the noise receptor, 4 dB where it is clearly perceptible, and 6 dB where it is highly perceptible.

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Impulsivity

A correction of up to +9 dB can be applied for sound that is highly impulsive, considering both the rapidity of the change in sound level and the overall change in sound level. Subjectively, this can be converted to a penalty of 3 dB for impulsivity which is just perceptible at the noise receptor, 6 dB where it is clearly perceptible, and 9 dB where it is highly perceptible.

Other sound characteristics

Where the specific sound features characteristics that are neither tonal nor impulsive, though otherwise are readily distinctive against the residual acoustic environment, a penalty of 3 dB can be applied.

NOTE 2 Where tonal and impulsive characteristics are present in the specific sound within the same reference period then these two corrections can both be taken into account. If one feature is dominant, then it might be appropriate to apply a single correction. Where both features are likely to affect perception and response, the corrections ought normally to be added in a linear fashion.

Intermittency

When the specific sound has identifiable on/off conditions, the specific sound level ought to be representative of the time period of length equal to the reference time interval which contains the greatest total amount of on time. This can necessitate measuring the specific sound over a number of shorter sampling periods that are in combination less than the reference time interval in total, and then calculating the specific sound level for the reference time interval allowing for time when the specific sound is not present. If the intermittency is readily distinctive against the residual acoustic environment, a penalty of 3 dB can be applied."

Appendix B3 – British Standard BS 5228-2:2009+A1:2014 – Code of Practice for Noise and Vibration Control on Construction and Open Sites

Table B.1 of British Standard BS 5228-2:2009+A1:2014 *'Code of Practice for Noise and Vibration Control on Construction and Open Sites'* contains PPV vibration criteria related to possible subjective effects, as shown in the following table below:

Table B.1. PPV vibration criteria related to possible subjective effects from BS 5228-2.

Vibration level	Effect
0.14 mms^{-1}	Vibration might be just perceptible in the most sensitive situations for vibration frequencies associated with construction. At lower frequencies people are less sensitive to vibration.
0.3 mms^{-1}	Vibration might be just perceptible in residential environments.
1.0 mms^{-1}	It is likely that vibration of this level in residential environments will cause complaint but can be tolerated if prior warning and explanation has been given to residents.
10.00 mms^{-1}	Vibration Is likely to be intolerable for any more than a very brief exposure to this level.

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