STATEMENT ON BEHALF OF FOXGLOVE AND GLOBAL ACTION PLAN

1. Foxglove is a CIC working to make technology fair for everyone. Global Action Plan is a charity working to improve the health of people and the planet.
2. We write to object to the proposed data centre at Houghton Regis: CB/24/03164/FULL
3. We understand the consultation ends today, 28 May 2025.
4. Please confirm: will the operator of this data centre be Amazon?
5. We are concerned about the lack of information on the environmental impact of the proposed data centre.
6. As far as we can see, the data centre's size is not included in the documents – please confirm its size in MW / GW.
7. Data centres are extremely resource intensive, both in terms of energy and water.
8. Any data centres built must have a positive impact on our environment, must not cost critical national resources of water and energy, and must not prevent the UK economy from transitioning to Net Zero and green energy.
9. Given the very high levels of electricity needed to operate data centres, their power demand must be met with additional renewable supply. Otherwise, the additional demand created by the data centre will be met to a greater extent by fossil fuel derived electricity production. This will have significant environmental impacts (see below).
10. It is stated, in the revised Sustainability Report for this proposed data centre, that it will not use fossil fuels "for day-to-day operations" in heating or cooling. That is misleading. Using electricity to power heating and cooling mechanisms, as well as the IT equipment itself, does not mean fossil fuels will not be burned; grid electricity is generated by fossil fuels to a lesser or greater extent depending on the generation mix on any given day. It is true that the "future decarbonisation of grid electricity" will help.
11. But grid decarbonisation will be slowed or reversed if hyperscale data centres' demand outstrips new renewable energy capacity. Building and transmitting enough additional renewable capacity to enable the electrification of heating and transport is already hugely challenging. Massively increasing electricity demand from hyperscale data centres such as this one makes it harder still.

12. A commitment from the developer and operator to use only renewable energy to build and power **this** data centre and the power needs of its computer racks and associated equipment is needed before any planning permission can be granted.
13. In addition, a net benefit in relation to climate, achieved by investment in and deployment of additional renewable capacity rather than via offsetting or carbon trading, is required from the developer and operator of this data centre. This is not simply about mitigation.
14. The authority should require not only the data centre to be run exclusively on renewable energy, but that additional renewable energy, sourced by the developer or operator, should be supplied to the UK's national grid during the duration of the data centres' operation. This should be a condition of any planning permission granted.
15. If the operator of this data centre is Amazon, one of the richest companies on the planet, this is certainly affordable to them.
16. Please learn from the mistakes of West London: in 2022, the Greater London Authority imposed an effective ban on new housing projects in three boroughs of west London because the electricity grid had run out of juice. The GLA highlighted how the construction of data centres in the region using power "equivalent to towns or small cities" had played a key role in maxing out the local grid. Please don't make the same mistake for Central Bedfordshire.
17. Data centres do not only require huge energy inputs to operate, but also vast amounts of water - needed to prevent overheating as well as the indirect water consumption required in the generation of electricity.
18. Thames Water recently estimated each data centre requires a supply of between 4-19 million litres of water per day. How much water will this data centre use during the course of its operation? What will happen in times of drought and high temperatures, when the water-cooling needs of data centres becomes even greater?
19. Water is a finite resource which must be carefully managed. Indeed, the government's Water Resources Management Plans for England already forecasts a shortfall of 5 billion litres of water per day by 2050, due to data centre demands.
20. As of today, the site's water supplier, Affinity Water, does not know how much of its water is consumed by the data centres it currently supplies.

21. The Applicant says[1] that it does not anticipate any objection from Affinity Water. It bases this on a pre-development enquiry from three years ago, in June 2022, when Affinity Water confirmed capacity. Correspondence with Affinity Water does not appear to be in the planning papers; can the Applicant confirm that its proposed development will not impact local supply?
22. Indeed, it is difficult to see how any water company in the UK can confidently say whether they will be able to cope with data centre demand. That is a critical knowledge gap that must be filled before projects like this data centre can be approved.
23. Affinity Water has singled out data centres as having placed further pressure on its resources during periods of higher temperatures. If Affinity Water is to supply water to this data centre, it needs to evidence that this need can be met without any potential impact on any protected sites. Nowhere can this evidence be seen from the papers available. Please confirm.
24. Until the building's developer and operator agree to serious, transparent commitments on energy and water use, the data centre should not proceed.
25. The developer's assertion that the "building's architecture" has been designed to "not require the use of active cooling in the data halls" needs serious and substantive scrutiny. Where has this design worked previously? Or is working now? Has the Applicant anywhere supplied data from metered resource consumption at comparable currently operational developments to support this assertion? Do AHUs utilising "fresh air" alone provide all the cooling required all year round? Is this true when the air temperature rises to e.g. >25 degrees centigrade? If not, what are the additional energy costs? What proportion of the energy supplied by solar panels will be used for the operation/cooling of IT equipment and data halls?
26. We remind you about the Supreme Court judgment in *Finch v Surrey County Council* (June 2024), which confirmed that planning authorities must assess downstream greenhouse gas emissions of a fossil fuel extraction project.
27. The same applies to the data centre project here. The proposed data centre will inevitably exacerbate the climate emergency. Though the proposals are not clear, if:

[1] see 'ADDITIONAL 2025.02.11 Combined Response to Consultee Comments - 12.02.2025.pdf'

1. the energy use of the 'equipment' (which we assume to mean computer racks and is actual rather than notional – please confirm) is 2,144 kWh/m2, as stated in the revised sustainability statement.
2. heating, cooling, lighting etc. require an additional 151 kWh/m2;
3. the data centre is 50,000m2 gross external floorspace;

…then total energy demand is 114,781,500 kWh. Based on 2024 grid carbon intensity of 124g/kWh, this will result in **14,232.91 tonnes of CO2 per year** (in addition to the 1,835 tonnes/year to test the back-up generators)**.** How will this be mitigated?

28. Until the local authority has properly assessed and considered the impact of this project on the climate, it is not possible to decide whether to grant consent or not. If you disagree with this statement, please confirm on what basis.
29. We note the Parish Council has raised similar concerns to us, with which we agree.
30. For the reasons set out above, "the power consumed by IT equipment or other equipment plugged in by the users as part of their use of the building" is absolutely relevant to the energy consumption of this proposal. This is a proposal for a data centre, it is literally all IT equipment.
31. Until their questions, and those above, are answered, planning permission should be refused.

Any questions or queries, please do not hesitate to get in touch.