



Statement on behalf of Foxglove and Global Action Plan

1. [Foxglove](#) is a CIC working to make technology fair for everyone.
2. [Global Action Plan](#) is a charity working to improve the health of people and the planet.
3. We object to the proposed data centre park in the land adjacent to Elsham Wolds Industrial Estate, North Lincolnshire, [PA/2025/643](#).
4. We understand the consultation ends 26 June 2025.
5. Data centres are extremely resource intensive, both in terms of energy and water.
6. 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 achieving the Government's commitment to net zero power sector emissions by 2030, the Nationally Determined Contribution (NDC) to the Paris Agreement of 68% overall reduction in emissions by 2030, or net zero emissions economy-wide by 2050.

Electricity

7. Given the very high levels of electricity needed to operate data centres, their power demand must be met with additional renewable supply.
8. Otherwise, given the existing challenges and anticipated [doubling of electricity demand](#) by 2040 of electrifying heating and surface transport, additional demand from data centres will inevitably be met by fossil fuel derived electricity production. This will have significant environmental impacts (see below).
9. The total energy demand of this site is indicated at 1000MW. The developers suggest on-site generators will produce 50MW through burning fossil gas.



10. The developers aim to generate an additional 95MW through on-site renewables, but there is no clear plan for how they will accomplish this. This leaves, in the best-case scenario, 855MWh that will presumably be drawn from the National Grid, in the form of additional burning of fossil fuels.
11. Grid decarbonisation will also be slowed or reversed if hyperscale data centres like this demand outstrips new renewable energy capacity.
12. Planning permission should not be granted on this basis.
13. A commitment from the developer and operator to use only additional renewable energy to build and power this data centre park, and the power needs of its computer racks and associated equipment, is needed before any planning permission can be approved.
14. 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.
15. The authority should require not only the data centre park 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 given.

Water

16. 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.
17. Thames Water recently [estimated each data centre](#) requires a supply of between 4-19 million litres of water per day.
18. How much water will this data centre use during the course of its operation, and from where will it be sourced? What will happen in times of drought and high temperatures, when the water-cooling needs of data centres become even greater just as water supplies become even more stressed?



19. Anglian Water notes that the developer has not provided details of non-domestic water demands for this project, and confirms it restricts water supply for non-domestic use to 20,000 litres per building per day - because water is a finite resource which has to be carefully managed. That is well below the 4-19 million litres required.
20. The government's Water Resources Management Plans for England forecasts a shortfall of 5 billion litres of water per day by 2050, with data centres a contributing factor.
21. This cluster of data centres will contribute both to that national stress, and to stress on local water resources.
22. It is unacceptable for the developer and operator to proceed with this project without having secured a suitable arrangement for sustainable water use.
24. Anglian Water has lodged an objection to this development. Its chief reason is the development's intended connection to the foul drainage network which could "lead to a deterioration in water quality and an unacceptable risk of breaching environmental legislation", as well as "cause pollution and a flood risk downstream".
26. We note that Elsham Parish Council has raised similar concerns to us, with which we agree.
27. If the development were to proceed without a sustainable water solution, one of three scenarios are likely to occur: (1) the data centres will not receive adequate water from the local source, resulting in more energy-intensive measures being used to cool their server racks; with the knock-on impact on increased energy use and potential CO2 emissions if renewable energy is not used; (2) they will draw from surface water, which requires an abstraction licence from the Environment Agency, which is not guaranteed and [Environment Agency documents](#) indicate the development is in an area where water abstraction is either restricted or not permitted; or (3) Anglian Water will make an exception and supply the additional water required for cooling, resulting in significant risk of water stress and degradation of local water supplies.
28. None of these scenarios is acceptable.



CO2 Emissions

29. The applicants indicate that the centre will operate on average at 50% of its 1000MW maximum capacity. Running 24/7, this would result in 857,254 tonnes of CO2 emissions per year.

30. Per capita CO2 emissions in the UK are 4.56 tons per person, according to the [International Energy Agency](#). This data centre park would, in other words, produce the equivalent of 188,000 people's carbon dioxide emissions per year.

31. The applicant proposes offsetting on these emissions by only 10%. This would require them to generate 95MW of renewable energy.

32. Nothing in the applicant's documents suggests this is possible. Despite the applicant's claim that "a number of renewable energy options will be investigated to establish their suitability for the site", by the developers' own admission, most on-site renewable energy options are off the table for this project.

33. The biomass plant, they suggest, would require the equivalent of 700 lorries' worth of wood chip deliveries per week. This would require massive deforestation – often in ecologically sensitive parts of the world – and create an unacceptable amount of traffic around the site which itself would also result in significant emissions.

34. Their suggestion of in-site wind turbines is not viable because the site would require well over 100 turbines to reach the target of offsetting 10% of CO2 emissions. We do not consider it likely 100 turbines would be granted permission in this location.

35. Photovoltaic panels would need to occupy an area greater than the entire site to reach the target.

36. The inescapable conclusion is that there is no realistic prospect of this project reaching even the measly 10% CO2 offset offered by the developer.

37. The idea that 'investigation' will yield further options is simply wishful thinking from the developers.

38. Even if 10% of these emissions are offset by renewable production, that still leaves a net equivalent of nearly 170,000 additional people's carbon impact.



39. [Ofgem](#) estimates the typical household in England, Scotland and Wales uses 2,700kWh of electricity per year. The total electricity demand of the proposed development is 3,679,200,000kWh per year. That is the equivalent of 1.36m additional 2-3 person households, more than the total number of households in the North East of England (1.22m).

40. Before granting permission, the local authority has an obligation to ensure this data centre has a positive impact on the climate.

41. On the basis of the information provided by the applicant, this data centre will have very negative consequences.

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