

Dear Sir/Madam,

I write to object to planning application **25/1781/FUL** for a data centre campus on the site of the former Mercure Hotel and adjoining land at **Tylers Way, Watford, Hertfordshire**.

1. The site lies within the Green Belt, with over half of the land not previously developed. The proposal therefore constitutes inappropriate development, and no very special circumstances have been demonstrated. Any suggestion that parts of the site constitute Grey Belt does not render the development acceptable.
2. The proposal includes four towers exceeding 39 metres in height, with a total floorspace of over 137,000 sq m. This represents substantial overdevelopment in terms of height, scale, and massing. The clustering of four towers will intensify their visual impact, resulting in an overbearing form of development, loss of openness, and skyline creep contrary to Council height and character policies.
3. Despite claims that façade treatments will soften outward-facing elevations, the scale and bulk of the development will remain overwhelming in this rural edge location, causing significant and lasting visual harm.
4. The electricity demand of the development is extreme, estimated at approximately **1,910 GWh per year**, around **4.5 times the borough's current electricity consumption**. Claims of negligible climate impact rely on purchasing renewable energy rather than the creation or direct use of new renewable generation.
5. As confirmed by the Council's Climate Change Department, the operational emissions cannot be considered negligible. Annual emissions could reach approximately **395,000 tonnes of CO₂e**, equivalent to around **63% of Hertsmere's current total emissions**, as demand will be met largely from the national grid.
6. Water supply and wastewater capacity remain unresolved. The development would require water equivalent to that used by approximately **15,000 residents** in an area already subject to water stress. Affinity Water has not confirmed sufficient supply capacity, and Thames Water has confirmed that local wastewater infrastructure cannot currently accommodate the proposal.
7. The Noise Assessment accepts that night-time noise levels will exceed existing background levels at multiple receptors. Even small exceedances occurring nightly will have a materially harmful impact on residential amenity and sleep quality. In view of the extreme height of the buildings noise also needs to be assessed from more distant receptors.

8. The construction phase is expected to last **10 years**, which is exceptional. The absence of a Construction Traffic Management Plan at this stage is unacceptable for a full application, given the scale and duration of anticipated disruption from noise, dust, vibration, and construction traffic.
9. The cumulative impacts of this development have been underestimated. When considered alongside other major schemes—including the expansion of the Elstree substation, the construction of the Letchmore Heath substation, the consented BESS facility off Hilfield Lane, and extensive nearby warehousing—the combined effects on traffic, noise, water supply, electricity demand, and local infrastructure will be severe and long-lasting.
10. Planning permission has already been granted for a data centre at **South Mimms**, and approval of this proposal would result in **two hyperscale data centres within the borough**. The cumulative impact of hosting multiple developments with exceptionally high electricity and water demands has not been adequately assessed, contrary to planning policy requiring proper consideration of cumulative effects. In a borough already experiencing water stress and constrained electricity infrastructure, concentrating such uses represents a disproportionate and unsustainable drain on essential utilities, to the detriment of existing communities and future development capacity.
11. Although the site is designated as an employment area, data centres generate very limited employment. This is reflected in the proposal's provision of fewer than 10% of the parking spaces normally required under Council policy for a B8 use of this scale.

The proposed towers will significantly harm the semi-rural character of this part of the A41. The application represents inappropriate development, and I strongly urge the Council to refuse planning permission.

Kind regards

[add name and address]