

Rt Hon Liz Kendall MP
Secretary of State for Science, Innovation and Technology
via email to: correspondence@dsit.gov.uk

Thursday 5 February, 2026

Data centres National Policy Statement and environmental impact

Dear Secretary of State,

We are writing as civil society organisations working on technology and the environment, to ask you to ensure that the National Policy Statement (NPS) on data centres properly addresses the huge energy use and environmental impact of these facilities.

We understand that the draft NPS is due to be published for consultation in the coming months, and we will of course be responding to that in detail.

However, we are aware that the tech industry has already engaged with the Government around proposals to give data centres Nationally Significant Infrastructure Project (NSIP) status. In October, lobby group techUK stated that “The Government has accepted techUK's call for data centres to be given the ability to 'opt-in' to the NSIP regime.”¹

As the NPS will guide the NSIP process, it is particularly important to ensure that this represents the interests of the wider public, not solely the technology industry.

To do so, it is essential that the NPS deals with data centres' vast use of electricity and (in many cases) water.

The new generation of 'hyperscale' data centres currently being planned across the UK are on a very different scale to the facilities in place today. For example, the data centres planned for Elsham in Lincolnshire, or Cambois in Northumberland will each have a 'capacity' (or demand) of one gigawatt (GW) of electricity. This is equivalent to the total

¹ See: 'Government Statement published on Recognising Data Centres as Nationally Significant Infrastructure,' techUK website, 21/10/2025: <https://www.techuk.org/resource/government-statement-published-on-recognising-data-centres-as-nationally-significant-infrastructure.html>

output of a gas or nuclear power station. By way of context, the peak winter electricity demand for the entirety of the UK is around 47GW.²

This additional demand - unless meaningfully matched with new, renewable energy generation and storage - poses a serious threat to efforts to decarbonise the UK's electricity grid.

Without these commitments, such vast electricity use will inevitably generate vast climate emissions. Even facilities smaller than the 1GW giants will, according to their own developers, contribute hundreds of thousands of tonnes of CO₂ to the atmosphere every year. Google's planned data centre in Essex will, according to the firm's planning documents, "lead to a net increase in GHG emissions of 568,727 tonnes CO₂e per year during the operational phase."³

Facilities using water to cool their computing equipment may also cause a significant drain on the local environment and water supply. There is often a lack of transparency from developers on these impacts, and the Environment Agency has said that they "are experiencing barriers in gaining information about water consumption" by data centres, and "more transparency is needed".⁴

With an estimated 100-200 proposed new data centres in the planning system already, it is crucial that the NPS fully acknowledges and addresses these challenges, to ensure that the public and the climate do not end up footing the environmental bill for these facilities.

At a minimum, we urge you to ensure the NPS includes:

1. A framework for the Government to consider the cumulative environmental impacts of the rollout of data centres, in order to meaningfully assess whether new 'hyperscale' data centres can be built and operate within existing carbon budgets; and without exacerbating local water scarcity in the areas where they are constructed.
2. A requirement for any data centre developer to undertake a full Environmental Impact Assessment for their proposed facility – including, but not limited to:
 - Scope 1,2 and 3 climate emissions which will result from both the construction and operation of their facility, including the power used by its computing equipment and cooling mechanisms.

² UK electricity stats 2024: "Peak demand in winter fell to 47.4 GW"

https://assets.publishing.service.gov.uk/media/688a28656478525675739051/DUKES_2025_Chapter_5.pdf

³ See 'Google's huge new Essex datacentre to emit 570,000 tonnes of CO₂ a year,' The Guardian, 15/09/2025: <https://www.theguardian.com/technology/2025/sep/15/google-datacentre-kent-co2-thurrock-uk-ai>

⁴ See 'National Framework for Water Resources 2025,' Environment Agency, 9.4: 'Water for data centres and artificial intelligence': <https://www.gov.uk/government/publications/national-framework-for-water-resources-2025-water-for-growth-nature-and-a-resilient-future/9-taking-action-on-other-significant-water-using-sectors-and-emerging-demands-national-framework-for-water-resources-2025>

- The volume of water that will be used by the construction and operation of their facility, including the use of water to cool computing equipment.
- Any potential pollution of the air, ground or water as a result of back-up generation, chemicals used in the computing equipment or cooling mechanisms, or other activities.

3. A requirement for any data centre developer to demonstrate to the Secretary of State that its facility will not cause an increase in the UK's overall climate emissions or local water scarcity. This will be achieved by:

- Requiring any developer to build or directly fund the construction of new, renewable generation⁵ and storage capacity, and any necessary grid connections, to completely power their proposed facility at all times.
- Requiring any developer to describe in detail the cooling mechanisms that will be used during the operational phase of the data centre, whether or not the developer will be responsible for its operation.
- Measures to prevent the use of 'greenwashing' in claiming the data centre is carbon-neutral, for example through the purchase of renewable energy certificates or the use of power purchase agreements which do not result in the construction of additional generating capacity. Every hour of usage in the data centre must be matched with 100% new renewable energy that is generated locally and additive to the local grid.

Note: these requirements could be applied only to the developers of data centres above a certain size - for example, a capacity of 500kW - 1MW, which is above the comparable reporting benchmarks used in Germany and the EU.

We look forward to engaging with the consultation, and would of course be happy to meet or to share further evidence relating to any of the points above which could help to inform the development of the NPS.

Yours sincerely,

Chris Adams, Director of Technology and Policy, The Green Web Foundation

Donald Campbell, Advocacy Director, Foxglove

Nick Dearden, Director, Global Justice Now

Rosie Downes, Head of Campaigns, Friends of the Earth (England, Wales and Northern Ireland)

Sonja Graham, CEO, Global Action Plan

Aoife O'Leary, CEO, Opportunity Green

Reply via: donald.campbell@foxglove.org.uk

⁵ Note: This means explicitly renewable energy (wind, solar etc), but would not include nuclear powered options now classed as "low carbon" within the draft 2025 NPPF.