09102026 The Draft London Plan consultation submission on data centres

GAP submission text:

In its current format, The London Plan does not meet the four tests of soundness, and additional needs should be addressed. The policy must adequately address the environmental harms that the roll out of hyperscale data centres is causing and will cause on a cumulative, not just individual, basis. In addition, it must address the barriers data centres present to meeting housing needs, as well as wider impacts on communities in areas data centres are planned.

Data centres put additional strain on the UK's finite water and power supplies, compete with local community needs, and jeopardise the move to clean power. A disproportionate amount of planned data centres are in and around London.

This policy should call for a moratorium in the construction of data centres until a national framework is in place addressing how many data centres are needed, what for and where, what level of cumulative emissions and other environmental harm from data centre build-out is acceptable, with clear benchmarks, and how developers will mitigate that harm, and a requirement for industry to report transparently on power and water usage.

In order to mitigate the impacts of data centres, deliver benefits for the local community and environment, the London Plan should establish an upper limit for cumulative installed data centre capacity, informed by and aligned with the GLA's 2030 net zero target and the Mayor's climate budget, and by national carbon budgets and the Carbon Budget and Growth Delivery Plan.

The London Plan should ensure all data centre planning applications:

- include an Environmental Impact Assessment that takes into account all scope 2 emissions, including those associated with so-called 'unregulated' energy use
- are conditional on developers' binding commitments to invest in new, additional, half-hourly matched renewable energy capacity equivalent to at least 100% of the data centre's maximum power demand for the lifetime of the data centre
- are denied if power will be provided by on-site 'behind the meter' gas or other fossil fuelled electricity generation
- meaningfully consult and involve the local communities around planned developments
- are approved only if they will not affect the delivery of critical local infrastructure such as, but not limited to, housing
- are considered after interrogation of the need for additional data centre capacity by assessing current utilisation rates

Energy & emissions:

The policy fails to address the substantial energy requirements of data centres. According to the International Energy Agency "a typical AI-focused data centre consumes as much electricity as 100 000 households, but the largest ones under construction today will consume 20 times as much", equivalent to 2 million homes.

Published emissions estimates from just 10 of the 100+ planned UK data centres will wipe out this year's CO2 savings from the switch to EVs, undermining years of hard-won progress.

Ofgem estimate that "at least 80GW" of data centres are seeking grid connections, the majority of which – if built – would come online in the 2030s. (For context, the entire UK's peak demand last winter was 45GW) This level of anticipated growth – much of which is earmarked for London and the surrounding area – far out-strips renewables capacity and will therefore drive an increase in fossil fuel use for electricity generation. Even were every new data centre connected to the grid, it will make significantly harder the already very challenging task of electrifying transport and heating. If data centres instead have their own on-site gas generation, as several applications are now requesting, the emissions impacts will be far more severe.

The London Plan must ensure that the rollout of data centres does not increase the UK's carbon emissions or jeopardise other critical sectors from decarbonising.

Water:

Data centres frequently rely on water to manage heat generated by densely packed servers. Cooling towers, chillers, and humidification systems are the main direct uses. The much larger proportion of data centres' water footprint – around 75% - is water consumed indirectly through gas- and biomass-powered electricity production to power the data centres. As the power demands of hyperscale data centres increase significantly, so too does their indirect water consumption.

Data centre developments are clustering in the areas at greatest risk of water scarcity, including London and the Southeast.

Based on official data, Global Action Plan estimate that 84% of the UK's proposed data centres are set to be built in areas that are already or soon to be experiencing water stress by 2040. Where data centres use little or no water for cooling, they use significantly more power for air-conditioning type systems, which has a significant indirect water cost.

There is currently no statutory obligation for developers to publicly disclose water-use. This must be addressed in the London Plan.

Air quality:

The London Plan must account for local air quality emissions produced by data centres. Local air pollutants are produced by diesel (or potentially HVO) powered back-up generators and, where applicable, on-site natural gas combustion for power generation.

Back-up generators equivalent to a data centre's total power output are a requirement and are subject to a rigorous testing and maintenance regime, generating significant quantities of NOx and PMs in the process. The London Plan should assess whether and how this maintenance and testing will impact AQMAs.

The London Plan must also ensure that data centres are not permitted to be built with on-site gas turbines. On a national level, data centre proposals have appeared in Beaconsfield (Wapseys Wood) and Bedfordshire (Quest Park) that will meet their 300MW and 720MW IT loads respectively with on-site gas turbines. Analysis suggests this would produce more than 4.5 million tonnes of greenhouse gas emissions. An equally substantial impact on local air quality is inevitable.

If data centres are to be powered by gas turbines in London, it is difficult to see how net zero by 2030 or WHO air pollution guidelines will be met.

Jobs and transparency

Community benefits must be properly assessed. It is vital that the London Plan uses long-term employment opportunities for communities rather than short term construction jobs when weighing up potential employment opportunities for data centre roll out and that the numbers industry predict are adequately challenged. Research by Verdant predicts that all the data centres currently planned in the UK are likely to directly employ 10,400 workers – compared with the more than 40,000 cited in projections by the industry lobby group TechUK.

Increasing London's housing stock:

The rollout of energy intensive data centres is contributing to the housing crisis. The London Assembly's Planning and Infrastructure Committee highlighted in a report in December 2025, that housebuilding in West London was delayed due to competition with data centres for grid connections. This report notes that the energy usage of a typical AI data centre is similar to that needed to power 100,000 homes.

The London Plan must address the gridlock in housebuilding caused by competition with data centres for grid connection. Additionally, the London Plan must ensure that in areas earmarked for new homes, data centres are deprioritised.

In Tower Hamlets, residents and the Council have been campaigning for the Truman Brewery site to be turned into affordable or social housing which would benefit the local community, some 31,000 of whom are on the housing register. These acute community needs have been overlooked by the Government, who overturned the council's decision and approved the data centre proposal.

It is vital that the London Plan prioritises local needs over demands from developers and makes a needs-based plan for how many data centres are needed across the city, where these will be and what they will be used for.

Reports:

https://www.globalactionplan.org.uk/latest/publications/not-a-drop-to-drinkhow-britains-data-centre-surge-threatens-water-security

https://www.globalactionplan.org.uk/latest/publications/new-reportbig-tech-data-centresa-threat-to-uk-decarbonisation

https://www.friendsoftheearth.ie/assets/files/pdf/the_cost_of_data_centres_-_modelling_the_household_electricity_costs_of_irelands_data_centre_sectordocxpdf.pdf

https://static1.squarespace.com/static/694531a67af76a6f89952c49/t/6aa05964095a94361a927bb8/1788893540856/Verdant+-+AI+Jobs+Mirage.pdf