



National Policy Statement for data centres

Appraisal of Sustainability Report

Department for Business, Innovation, Science and Trade

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Appendix A	Review of Relevant Plans, Policies and Programmes
Appendix B	Scoping Report Consultation Feedback



Acronyms and Abbreviations

Glossary	
AI	Artificial Intelligence
AoS (Appraisal of Sustainability)	A Sustainability Appraisal is a requirement of the Planning Act 2008, a Strategic Environmental Assessment (SEA) process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment. Central government guidance has merged these processes to allow for a single joint appraisal to be carried out termed an Appraisal of Sustainability (AoS).
CEMP	Construction Environmental Management Plan
CNI	Critical National Infrastructure
BIST	Department for Business, Innovation, Science and Trade
BtM	Behind-the-Meter (BtM) power generation is electricity production and storage systems located on the customer's side of the utility meter, meaning the power is generated at or near the point of consumption rather than being provided by the grid.
GHG	Greenhouse Gas Emissions
HGV	Heavy Goods Vehicle
Habitats Regulations Assessment (HRA)	An assessment in accordance with the Habitats Regulations (The Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations (as amended)) to ascertain the significance of potential impacts of a plan or project on relevant European or Ramsar sites. The assessment determines whether the plan or project would adversely affect the integrity of the sites in terms of its nature conservation objectives (alone and in combination with other plans or projects).
HVAC	Heating, Ventilation and Air Conditioning
In Combination Effects	Where policies, plans or projects affecting the same area might affect European or Ramsar sites in combination with each other
IROPI	Imperative Reasons of Overriding Public Interest
LNRS	Local Nature Recovery Strategy Locally led strategies which agree priorities for nature's recovery, map the most valuable existing areas for nature, and map specific proposals for creating or improving habitat for nature and wider environmental goals.
LPA	Local Planning Authority
NPPF (National Planning Policy Framework)	Published in August 2026, the National Planning Policy Framework (NPPF) sets out the Government's policies for plan-making and for making decisions on development proposals in England. The NPPF is supported by the National Planning Practice Guidance (NPPG).
NPS (National Policy Statement)	National Policy Statements are produced by government. They comprise the government's objectives for the development of nationally significant infrastructure in a particular sector. National Policy Statements undergo a democratic process of public consultation and parliamentary scrutiny before being designated and provide the framework within which Examining Authorities make their recommendations to the Secretary of State.
NPS-DC	National Policy Statement for Data Centres



Glossary	
NSIP (Nationally Significant Infrastructure Project)	Nationally Significant Infrastructure Projects (NSIPs) are dealt with under the Planning Act 2008. Thresholds for NSIPs are defined under Sections 15-30A of the Act, but are generally larger scale infrastructure projects, developments of national importance in terms energy, transport, water, wastewater, and waste.
PPP	Plans, programmes and policies
SA (Sustainability Appraisal)	A systematic process required by the Planning and Compulsory Purchase Act 2004 and incorporating the requirements of the SEA Directive, aimed at appraising the social, environmental and economic effects of plan strategies and policies and ensuring that they accord with the objectives of sustainable development.
SAC	Special Areas of Conservation
SEA (Strategic Environmental Assessment)	A process required by EU Directive 2001/42/EC (known as the SEA Directive) and the SEA Regulations (Statutory Instrument No. 1633) for the formal assessment of certain plans and programmes which are likely to have significant effects on the environment.
SoS	Secretary of State
SPA	Special Protection Areas
SSSI	Sites of Special Scientific Interest
Proposals/Policies Map	A map accompanying the LDF showing areas of protection and identifying locations for land use and development proposals included in the adopted Development Plan Documents.



1.0 Introduction

1.1 The background and context to the new data centres national policy statement

National Policy Statements (NPSs) outline the government's aims and policies for the development of infrastructure deemed nationally significant within specific sectors. They serve as the basis upon which the Planning Inspectorate advises the appropriate Secretary of State on whether such major infrastructure projects should be approved. NPSs apply to developments classified as "Nationally Significant Infrastructure Projects" (NSIPs) and are established under the Planning Act 2008. Their role is to clarify how government policy informs decisions on development consent, thereby excluding debate on the policy itself from the examination process and ensuring that decisions are made solely on planning grounds.

In September 2024, data centres in the UK were recognised as 'Critical National Infrastructure' (CNI) under the Communications sector¹ and will be brought within scope of the Nationally Significant Infrastructure Projects (NSIP) planning regime by January 2026 through secondary legislation under the Planning Act 2008. The Department for Business, Innovation, Science and Trade (BIST) has therefore initiated the NPS for Data Centres ('NPS-DC') with the aim of consulting on a draft at the beginning of 2026.

The NPS-DC objectives are to:

- Set out the policy for planning in England for NSIPs for data centres;
- Explain the need for data centres and how applications to NSIP will assist in this requirement;
- Provide the criteria for the SoS to make fair decisions on whether applications to NSIP from data centre developers are approved;
- Inform applicants on what needs to be considered in making an application, including the impacts and assessments required;
- Provide policy and guidance support to LPAs in preparing local impact reports under Section 60 of the Planning Act 2008; and
- Ensure the development of data centres under NSIP supports the government's policies, goals, and requirements for data supply.

The NPS-DC will stand alone, however other draft NPSs (for example EN-1 to EN-6 for energy) may be relevant considerations for co-location or cross-sectoral development. The NPS-DC will be reviewed at least every five years or earlier if deemed necessary by the SoS.

A typical data centre consists of servers, storage systems and network equipment within a building. These computer systems process and store the vast amounts of data generated daily. To maintain the data centre equipment, cooling systems and security are integrated into their designs. To power the data centre, they are typically connected to the public electricity grid as well as backup energy generation. The data stored belongs to private

¹ (Department for Science, Innovation and Technology 2024)



citizens as well as that of private organisations and government. Data centres have therefore taken on a major role in enabling modern life, ensuring that the information we receive and send digitally can be accessed securely 24/7.

The UK is already home to the greatest number of data centres in western Europe² and the industry is expected to experience significant growth driven in large part by widespread adoption of Artificial Intelligence (AI), increasing the demand for computing power and storage.

The NPS-DC will:

- Create a pathway for the developers of large data centre projects in England to seek planning approval from the relevant Secretary of State (SoS) for data centre developments that fall within scope; and
- Provide a decision-making framework for the SoS to determine applications for data centre developments that fall within scope, as per other categories of NSIP projects recognised under the Planning Act 2008 (e.g. ports).

For data centre projects that are within scope, but do not proceed for planning approval under the NSIP pathway, the draft NPS-DC will nevertheless aim to provide relevant guidance to support developers and Local Planning Authorities (LPAs) in their decision-making, including on the preparation of local impact reports.

1.2 Purpose of this AoS Report

This AoS Report has been prepared for draft NPS-DC which covers data centres ≥ 100 MW of capacity. This AoS report has two primary functions:

1. Under the Strategic Environmental Assessment (SEA) Regulations 2004 (as amended), which implement Directive 2001/42/EC, any plan or programme that sets the framework for development consent must undergo public consultation. This consultation must be accompanied by an environmental report that identifies, describes, and evaluates the likely significant environmental effects of implementing the plan. Amongst other things, the NPS-DC is a policy for the purposes of the Regulations, and so this AoS report fulfils the function of an environmental report under the Regulations.
2. The Planning Act requires that National Policy Statements (draft NPSs) undergo an Appraisal of Sustainability (AoS) before designation. While similar in scope to an environmental report under the SEA Regulations, the AoS places greater emphasis on social and economic impacts and is guided by the principles of sustainable development, commonly defined as ensuring that development meets present needs without compromising the ability of future generations to meet theirs.

By requiring the AoS to be produced alongside the draft NPS while it is still in draft form, the SEA Regulations ensure a consideration of the potential environmental (and wider sustainability) effects of the NPS. It also provides an opportunity for consultees to review and comment on the draft.

² (Department for Science, Innovation and Technology 2024)



2.0 Overview of AoS process

2.1 Assessment methodology

There is no specific guidance on preparing an AoS, however the process and methods that have been applied follow recognised best practice and the principles and approaches developed in early published guidance documents:

- Sustainability Appraisal (SA) of Regional Spatial Strategies and Local Development Documents. Guidance for Regional Planning Bodies and Local Planning Authorities, by the ODPM, the Scottish Executive, the Welsh Assembly Government and the Northern Ireland Department of the Environment November 2004;
- A Practical Guide to the Strategic Environmental Assessment Directive, by the Office of the Deputy Prime Minister, the Scottish Executive, the Welsh Assembly Government and the Northern Ireland Department of the Environment, September 2005; and
- Guidance on Strategic Environmental Assessment and Sustainability Appraisal, 2020, providing clarity on the need for appraisals in relation to plan development.

The AoS of the draft NPS-DC has been carried out in a staged approach. Figure 1 demonstrates the various preparation stages of the AoS. Habitats Regulations Assessment (HRA) has been undertaken in parallel to the AoS and its results incorporated into the AoS as appropriate.

It is to be noted that the processes of SEA and HRA are based on European Union (EU) Directives. While the United Kingdom has left the EU, the relevant SEA and HRA Regulations implementing these processes still apply.

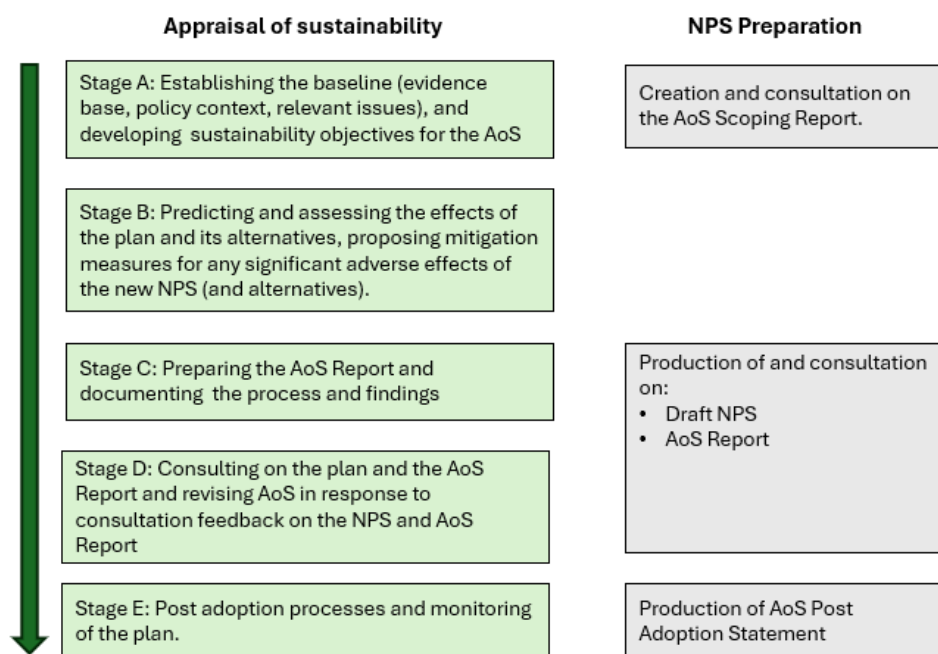


Figure 1: Appraisal of Sustainability Process

This AoS report represents Stage C in **Figure 1**, which demonstrates the various preparation stages of the AoS. The methodology that has been adopted is described further below.



2.2 Scoping

2.2.1 Establishing the policy context and existing baseline

The draft NPS-DC will shape, and in turn be shaped by, other plans, policies and programmes (PPPs) developed by local and combined authorities, statutory agencies, and other organisations with responsibilities for plan-making. Legislation also plays a key role in establishing the framework for the draft NPS-DC, both directly and indirectly. To support the development of this AoS report, relevant legislation, plans and programmes have been identified and considered.

To accurately predict how draft NPS-DC policies will affect the current baseline, it is first important to understand its current state and examine the probable evolution without the implementation of the plan. Baseline information has therefore been assessed to provide the basis for understanding existing relevant environmental, economic and social issues. This baseline will also be used to generate the framework against which to assess the NPS-DC and to inform both the assessment and the generation of indicators to monitor sustainability effects.

Key sustainability issues were identified through a review of other plans and programmes and analysis of baseline data. These issues helped to focus the AoS process on the most important aspects. The assessment also considered how the draft NPS-DC might be affected by these issues and how it could contribute to addressing them.

A set of AoS Objectives has been developed, against which the policies in the draft NPS-DC could be assessed. For each objective, guide questions were set out to form the AoS Framework. The assessment and questions provided a clarification of the intended interpretation of each objective to support direction of change sought through the implementation of the draft NPS-DC.

The scoping information was refined through prior consultation on the AoS Scoping Report with the statutory consultees identified under the SEA Regulations (including those of England)³. This consultation took place from 22nd of September 2025 to 24th of October 2025. The consultation comments (see **Appendix B**) were taken on board in preparing this AoS Report and updates made are reflected in this report as appropriate.

2.2.2 Technical Scope

The AoS considers topics covered under the SEA Regulations in addition to the AoS guidance, which requires the consideration of socio-economic factors alongside environmental factors, see Table 1.

Table 1: AoS Topics and SEA Topics

AoS Topics	SEA Regulations Topics required to be considered
Greenhouse gas emissions Climate change resilience	Climatic Factors
Air quality	Air

³ Historic England, Natural England and the Environment Agency



AoS Topics	SEA Regulations Topics required to be considered
Biodiversity, flora and fauna	Biodiversity, flora and fauna
Population	Population
Human Health	Human Health
Noise	Not required by SEA regulations
Landscape	Landscape
Cultural heritage	Cultural heritage, including architectural and archaeological
Macro-economic impact	Material Assets
Infrastructure and security	Not required by SEA regulations
Water	Water
Soil, land, minerals and agriculture	Soil
Circular economy	Not required by SEA regulations

2.2.3 Geographic Scope

The draft NPS-DC is to be considered non-spatial in its application. As such, potential effects have been considered across a range of geographic scales (including UK, regional and local). The AoS applies to the same geographical area of the draft NPS-DC, which is England, except where any transboundary effects have been identified. For the avoidance of doubt, the draft NPS-DC does not apply to the marine area.

As the draft NPS-DC does not prescribe the location for new data centres projects, there are limitations in terms of appraising those effects that are site specific in nature. This does not exclude the possibility that they could be significant but rather indicates that such effects may only be effectively judged as significant at the project level (for example, increases in light pollution from a cluster of data centres). This helps clarify why impacts that may be strongly experienced at the local level do not always appear as strategically significant within the assessment scoring. Detailed consideration of such project-level effects will be undertaken during the development consent process, specifically through the Environmental Impact Assessment (EIA) and, where applicable, the HRA.

2.2.4 Temporal Scope

The AoS considers the full lifetime of any individual data centre development which might arise from the NPS-DC and that includes the construction, operation and decommissioning stages. For the purposes of the AoS, it is proposed that the lifecycle of any data centre project addressed in the new draft NPS-DC (≥ 100 MW rated IT load capacity) lasts for a period of 20+ years. This period is based on the following assumptions:

- Construction: Up to three years;
- Operation: Approximately 20 years; and
- Decommissioning: Approximately two years.

With regards to the duration of potential effects identified within the assessments, the following definitions have been followed:

- Short term: 0-5 years;



- Medium term: 5-20 years; and
- Long term: 20+ years.

2.2.5 Establishing an Appraisal Framework

Defining clear objectives and supporting guide questions is a fundamental part of the appraisal process, offering a structured and consistent approach to evaluating the potential effects of implementing the draft NPS-DC. The objectives outlined in this section have been shaped by a review of baseline evidence, including the identification of key issues, the analysis of relevant plans and programmes, and feedback received during consultation on the Scoping Report.

Their formulation also aligns with national guidance on SEA and SA methodologies. In general, the objectives reflect desired social, economic, or environmental outcomes, typically aiming to reduce negative impacts and enhance positive ones where applicable. Guide questions were developed for each objective to clarify their relevance to data centre infrastructure and to provide greater specificity for the appraisal. The AoS Framework is presented in Table 2.

Table 2: Appraisal of Sustainability Framework

No.	AoS Objective(s)	Guide Questions: Will the draft NPS for data centres support?
1	To minimise greenhouse gas emissions and support the transition to a net zero economy	• Creation of energy efficiency in digital infrastructure? • Grid decarbonisation and electrification of industry and infrastructure? • Transparency in energy and emissions reporting for data centres? • Adoption of renewables and low-carbon energy sources? • Protection of carbon stores/sinks?
2	To maximise adaptation and resilience to climate change	• Resilience to the effects of climate change (e.g. flooding, water scarcity, sea level rise, changing temperature) throughout their operational lifespan in both siting and design? • Adaption to the predicted changes in weather conditions and frequency of extreme weather (freezing, heat waves, intense storms)? • Realisation of the dual benefits of green and blue infrastructure for climate adaptation and biodiversity? • Local Flood Risk Management Plans and encourage the use of natural flood management techniques, where appropriate, to reduce vulnerability to flood risks?
3	To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality (linked to separate HRA process for draft NPS for Data Centres)	• Avoid the direct loss of, or indirect harm to 'habitat sites' (SPA's, SACs, Ramsar sites) including candidate SPAs, proposed SACs, Sites of Community Importance (SCI), proposed Ramsar sites, and compensation sites? • Adherence to the mitigation hierarchy (avoid, mitigate, compensate), as a principle when assessing biodiversity impacts? • Protection and enhancement of habitats or species populations, including those that are non-designated as well as those that are protected? • Continued improvements to the condition status of the UK's national site network? • Protection and enhancement of the structure, function and resilience of ecosystems and the services they provide?



No.	AoS Objective(s)	Guide Questions: Will the draft NPS for data centres support?
		Protection and enhancement of the condition status the Nature Recovery Network, including new habitat creation or restoration and enhancing linkages with existing habitats?
4	Conserve and enhance cultural heritage assets and their settings, and the wider historic environment	- Conserving and enhancing internationally and nationally designated heritage assets and their settings? - Conserving and enhancing non-designated heritage assets, archaeological remains and their settings? - Conserving and enhancing heritage assets and the wider historic environment including landscapes, townscape, buildings, structures and archaeological remains?
5	To conserve, protect and enhance landscape and townscape quality and visual amenity.	- Protecting the integrity of any areas designated for landscape value, including in conjunction with the provisions of any relevant Management Plan (e.g. AONB and local landscape designations)? - Avoiding development within National Parks, the Broads and National Landscapes? - Developments in advancing the statutory purpose of designated landscapes? - Conservation and enhancement of the intrinsic character or setting of landscapes or townscape? - Conservation, protection and enhancement of natural environmental assets (e.g. parks and green spaces, common land, woodland / forests etc) where they contribute to landscape and townscape quality?
6	To protect, enhance and increase resilience of water quantity and quality	- The availability of water resources, particularly in areas experiencing water stress? - Measures to minimise water consumption across all phases of development (construction, operation, and decommissioning), through water efficient technologies and practices? - The integration of Sustainable Drainage Systems (SuDS) into site design, wherever feasible, to manage surface water run-off, reduce flood risk, improve water quality, and support biodiversity? - The protection and improvement of water quality, including the prevention of pollution and the restoration of degraded water bodies? - Alignment with relevant water management plans and strategies? - Working with natural systems (such as wetlands, rivers, and aquifers) in regulating water quantity and quality?
7	To minimise emissions of pollutant gases and particulates and protect air quality	- Minimising emissions within the context of The National Emissions Ceiling Regulations 2018 for sulphur dioxide, oxides of nitrogen, ammonia non-methane volatile organic compounds? - Ensuring data centres do not lead to exceedances of legally binding limits for concentrations in outdoor air for the protection of human health and ecosystems? - Application of best available technologies for back-up energy supply?
8	To conserve and enhance soil health and geology and contribute to the sustainable use of land	- The efficient use of land, given its multifunctional use and competing needs for housing and nature recovery? - The prioritisation of redeveloping previously developed rather than greenfield land? - Remediation of contaminated land and restoration of degraded land, to enhance soil health?



No.	AoS Objective(s)	Guide Questions: Will the draft NPS for data centres support?
		- Protection and appropriate management of soil resources during development, including where feasible retaining the long-term value of soil resources and soil quality? - Avoidance of development on high-quality agricultural land, classified as BMV?
9	To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities	- Avoiding increases in noise on communities including sensitive locations, receptors and views? - Protect and enhance the social infrastructure and amenities available to local communities, including managing access disruptions during construction? - Delivery of green infrastructure and opportunities for access to nature, including nationally significant routes such as national trails and the King Charles III England Coastal Path? - Promoting stable affordable energy for consumers? - Minimising the risk or consequences of a major incident? - Creation of new recreational routes, green corridors and open spaces, in particular for communities that have lower access to green and blue spaces.
10	To promote a strong, diverse, and stable economy	- Enhanced security, reliability and affordability of digital services? - Enhanced security, reliability and affordability of the national energy supply? - Benefits of integration with other services and infrastructure (e.g. electricity, gas, transport, communications)? - Delivery of infrastructure to support economic investment? - Contribution to a resilient national network of data centres providing reliable service to users?
11	Support local economies and promote opportunities to improve education and skills, and employment	- Creation of both temporary and permanent jobs particularly in areas of need? - Investment in education and skills development e.g. digital or engineering? - Improved digital access for underserved communities and regions?
12	Promote the national security of the UK	- National energy independence and reliability of supply? - Creation of a secure network of data centres, resilient to shocks and disruption? - Use of reliable supply chains for critical components and materials?
13	Promote sustainable waste management and resource use	- Making the best use of existing infrastructure and resources? - Minimisation of materials consumption in construction and operation, including the use of recycled and / or secondary materials and re-use and recycling of recovered components and materials? - Sustainable waste management practices in line with the circular economy?

2.3 Appraisal of draft NPS Data Centres Policies

The appraisal of the draft NPS-DC policies has been undertaken in a topic by topic manner, with the draft NPS-DC tested against each of the 13 AoS objectives. Where relevant, the



interactions between topics have been considered and the commentary is reported against each of the AoS Objectives.

The appraisal seeks to predict the significant environmental effects of the draft NPS-DC. The effects of implementing the draft NPS-DC are predicted by identifying changes to the baseline that would result from its application. Where possible, these changes are described in terms of their geographic extent, the timeframe over which they may occur, and whether the effects are temporary or permanent, beneficial or adverse, probable or uncertain, frequent or rare, and whether they are secondary, cumulative, or synergistic.

In most cases, quantitative data is not available to support the development of predictions. Where this is the case, effects have been assessed using professional judgement, informed by relevant legislation, regulations, and baseline data. The significance of likely effects has been evaluated using the six categories outlined in Table 3.

Table 3: Significance of predicted effects key

Symbol	Definitions of Significance of Effects Against the AoS Objectives	General assumptions on the nature of effects
++	Significant Positive Effect: the option or policy supports the achievement of this objective; it addresses all relevant assessment questions and could result in a potentially significant beneficial effect	Permanent Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be to: - enhance and redefine a location in a positive manner, making a contribution at a national or international scale; - repair or restore receptors badly damaged or degraded through previous uses; and/or improve one or more key elements /features/characteristics of a receptor with recognised quality such as a specific regional or national designation.
+	Minor Positive Effect: the option or policy supports the achievement of this objective; it addresses some relevant assessment questions, although it may have only a minor beneficial effect	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could: - improve undesignated yet recognised receptor qualities at the neighbourhood scale; - fit into or with the existing location and existing receptor qualities; - affect a localised receptor; and/or - enable the restoration of valued characteristic features partially lost through other land uses.
0	Neutral Effect: the option or policy has no impact or effect and is neutral insofar as the benefits and	N/A



Symbol	Definitions of Significance of Effects Against the AoS Objectives	General assumptions on the nature of effects
	drawbacks appear equal and neither is considered significant	
?	Uncertain Effect: Uncertain or insufficient information on which to determine the assessment at this stage	N/A
-	Minor Negative Effect: the option of policy appears to conflict with the achievement of this objective; it does not address relevant assessment questions and may result in minor adverse effects	Reversible Infrequent or intermittent Magnitude: Low 20-40% of receptor or capacity affected. The size, nature and location of a proposed scheme could: • be out of scale with the location; • affect a localised receptor; and/or • leave an adverse impact on a receptor of recognised quality such as a specific district or county designation.
--	Significant Negative Effect: the option or policy works against the achievement of this objective; it does not address relevant assessment questions; it could exacerbate a negative situation and may result in a potentially significant adverse effect e.g. loss of all or part of a designated ecological site of national importance.	Permanent Irreversible Continual Magnitude: High 80%+ receptor or environmental capacity affected; or Medium 40-80% of receptor or environmental capacity of affected The effect could be: • to permanently degrade, diminish or destroy the integrity of the receptor; • to cause a very high-quality receptor to be permanently changed and its quality diminished; • not fully mitigable and may cumulatively amount to a severe adverse effect; • at a considerable variance to the location, degrading the integrity of the receptor; and/or • substantially damaging to a high-quality receptor such as a specific regional or national designation.

The NPS-DC is not site-specific and instead provides a framework for evaluating applications for developments of the relevant type in any location. As a result, all findings carry a level of uncertainty, since the actual effects will depend on the nature of the infrastructure and the specific location where it is proposed. Where both beneficial and adverse effects have been identified, these are presented in relation to the relevant AoS Objective as appropriate.

2.4 Appraisal of Alternatives

The SEA Regulations also require identifying the potential significant sustainability effects of reasonable alternatives. Where there are reasonable alternatives to the preferred option,



the AoS must assess them to the same level of detail and present the sustainability performance to allow comparison between options. This enables informed choices to be made between the preferred option and the alternatives. Alternatives are considered in Section 6.0 of this Report.

To ensure a consistent approach was taken to options assessments, all identified options were assessed as reasonable alternatives against the AoS Framework (Table 2) to the same level of detail, in order to identify potential sustainability effects.

2.5 Cumulative and Transboundary Effects

The SEA Regulations require that cumulative effects be considered (Schedule 2, Paragraph 6). These effects may occur when multiple proposed developments interact. Potential cumulative effects have been identified within Section 7.0 of this report.

Transboundary effects may affect other countries. These have been considered in a manner similar to cumulative effects, with the assessment focusing on impacts originating in England that could extend across national borders. Regulation 14 of the SEA Regulations requires notification to EU Member States if a Plan or Programme is likely to have a significant environmental effect on their territory.

This is considered in the AoS, however for the avoidance of doubt, neither the NPS-DC, nor the alternatives assessed are expected to have transboundary effects with EU Member States.

2.6 Monitoring the Effects of implementing the draft NPS

Table 26 within Section 8.0 of this report sets out draft monitoring recommendations for the NPS-DC focusing on the potential significant and uncertain effects identified in the AoS assessments in Section 5.0 and 7.0.

2.7 Data and assessment limitations

Although the available datasets are considered to offer a comprehensive overview of sustainability issues across the United Kingdom, particularly in England, within the scope of the draft NPS-DC, the national scale of the assessment means that regional or local differences are not easily distinguishable. Consequently, the assessments are high-level and strategic in nature.

Another limitation of the assessment stems from the non-spatial nature of the NPS-DC. Since the NPS-DC does not specify locations for new infrastructure projects, it is not possible to fully assess effects that are site-specific. This does not mean such effects are insignificant, but rather that their significance can only be properly evaluated at the project level. As a result, effects that may be strongly felt at the local level do not always appear as strategically significant within the scoring sections of the assessment.

Note that due to inherent uncertainty in assessment due to the non-spatial nature of NPS-DC, a precautionary approach has been taken to findings set out in the AoS. The assessment of project level effects will be given full consideration at the application for development consent, particularly through EIA, and, where relevant, HRA.



2.8 Habitats Regulations Assessment

In the UK, Article 6 of the Habitats Directive (92/43/EEC) has been transposed into domestic legislation as the Habitats Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017, collectively referred to as the 'Habitats Regulations'. A HRA must be carried out for any proposed plan or project that is not directly related to the management of a European Site but is likely to have a significant effect on one or more such sites, either alone or in combination with other plans or projects.

European Sites include Special Areas of Conservation (SACs), originally designated under European Council Directive 92/43/EEC (referred to as the Habitats Directive), and Special Protection Areas (SPAs), originally designated under the Conservation of Wild Birds Directive (Council Directive 2009/147/EC (which codifies Directive 79/409/EEC)) for rare, vulnerable and regularly occurring migratory bird species and internationally important wetlands. As a matter of Government policy listed or proposed Ramsar sites, potential SPAs (pSPA), candidate SACs (cSAC) and sites identified, or required, as compensatory measures for adverse effects on habitats sites, pSPAs, cSACs and listed or proposed Ramsar sites, are treated in the same way as European Sites.

This requirement includes strategic plans with an impact on land use. A HRA report has been prepared for the draft NPS-DC in a parallel process to the AoS. The HRA report is being consulted on with Natural England and publicly alongside both the draft NPS-DC and this AoS report.

The Habitats Regulations require assessment of the draft NPS-DC as a plan and as such the HRA has been undertaken on that basis; it does not remove the requirement for detailed project level HRA to be undertaken at development consent stage. There are no specific sites, allocations or any spatial component to the draft NPS-DC currently. Therefore, the HRA has focused on the policy content within the draft NPS-DC and has been applied in a manner which is consistent with the non-spatial, strategic nature of the NPS-DC which does not identify locations to construct new data centres.

The NPS-DC is not directly connected with or necessary to the management of any listed or proposed European and Ramsar sites. Therefore, subsequent steps of Stage 1: Screening must be undertaken.

HRA Stage 1 (Screening) and Stage 2 (Appropriate Assessment; AA) have been undertaken. Mitigation was put forward at the end of Stage 2 but not all of which could be adopted within the NPS-DC and therefore Stage 3: Derogation was undertaken, considering its three legal tests:

- Test 1: Consider Alternative Solutions;
- Test 2: Consider IROPI (Imperative Reasons of Overriding Public Interest); and
- Test 3: Secure Compensatory Measures.



3.0 Policy context, baseline and key sustainability issues

3.1 Review of Policies, Plans and Programmes

The SEA Regulations requires a report containing: *‘An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes’* (Schedule 2, Paragraph 1) *‘The environmental protection objectives, established at international, community or national level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation’* (Schedule 2, Paragraph 5).

3.2 Summary of PPP reviewed

The PPP review is a valuable element of the AoS process as it assists with the identification of environmental, social and economic objectives of other relevant PPP that will guide:

- The identification of sustainability issues and opportunities pertinent to the draft NPS;
- The development of the AoS Framework to be used in the assessments of the new draft NPS.

It also supports the identification of planning and thematic guidance across sustainability topics which may shape draft NPS-DC policy approaches as advocated by the AoS, and the identification of any clear early potential conflicts or challenges between the PPP and planning and thematic guidance with the emerging draft NPS-DC policy.

In **Appendix A**, tables present the review of PPP and document the following:

- The primary objectives of the documents including their environmental protection objectives where appropriate;
- Key indicators and targets of relevance in the documents; and
- How the objectives within the policies, plans and programmes should be taken into consideration in the AoS and draft NPS-DC processes.

3.3 PPP Themes

The review of PPPs revealed a large number of common themes in terms of their objectives relating to sustainability within the context of strategic planning. These are listed below:

Table 4: Key messages from PPP review by theme

Topic	Key messages from review
Climate change Greenhouse gases (GHGs)	• Support global climate goals and promote international collaboration on clean energy and emissions reduction; • Deliver the UK's net zero target through coordinated policy, investment, and regional partnerships; • Ensure future developments are aligned to the UK climate change GHG reduction targets; • Ensure future developments are aligned to the UK climate change GHG reduction targets; • Promote energy efficiency and reduce emissions;



Topic	Key messages from review
	• Support clean growth through low-carbon and energy-efficient buildings; • Improve energy efficiency across sectors, ensuring buildings meet minimum energy performance certificate (EPC) standards; • Decarbonise power, transport, industry, and buildings through sector-specific actions; • Restrict new fossil fuel power generation sources to meet electricity decarbonisation targets; and • Maintain the continuous improvement in industrial emissions.
Climate change Climate change resilience	• Ensure that suitable adaptation to climate change risks is addressed; • Ensure that developments consider how they will adapt to the impacts of climate change including heatwaves, flooding and extreme weather; • Ensure that suitable adaptation to flood hazards is considered, in particular avoidance of flood risk through design; and • Ensure developments consider their exposure to flooding and coastal erosion risks.
Natural environment Air quality	• Reduce emissions of harmful air pollutants including sulphur dioxide, nitrogen oxides, ammonia, Volatile Organic Compounds (VOCs), and particulate matter; • Reduce emissions of harmful air pollutants; • Ensure that industrial emissions reduce pollutants to air and avoid adverse health impacts; • Meet limits for outdoor air pollutants; • Reduce population exposure to PM2.5 and meet legal targets for nitrogen dioxide and other pollutants; • Deliver clean air targets including halving health impacts from air pollution by 2030; and • In identified smoke control areas, ensure only approved fuels are used.
Natural Environment Biodiversity, flora and fauna	• Conserve wild flora and fauna and protect natural habitats, with a focus on endangered and migratory species; • Protect and conserve Sites of Special Scientific Interest (SSSI) through assessment and protections; • Protect SPAs, SACs through HRA and planning protections; • Comply with restrictions on designated sites and mitigate effects to species and habitats during development; • Restore wildlife-rich habitats and protected sites in line with the 25 Year Environment Plan; • Recognise and halt the decline of biodiversity by taking steps to protect and restore nature; • Ensure that developments restore and protect nature values; • Deliver biodiversity net gain through development, including a mandatory 10% gain; • Contribute to international biodiversity goals including the Aichi Targets and Kunming-Montreal Framework; • Ensure protection of (Ramsar) wetland habitats • Promote green and blue infrastructure networks to support biodiversity, climate resilience, and public wellbeing; • Consider objectives that promote the protection and enhancement of the water environment;



Topic	Key messages from review
	• Prevent deterioration and achieve good ecological and chemical status for all water bodies; • Protect and enhance rivers, lakes, estuaries, and groundwater through River Basin Management Plans; • Ensure that pollution to air and water is prevented or minimised; and • Limit light pollution through good design, protecting dark landscapes and nature conservation.
Communities Population	• Promote healthy, inclusive and safe places through planning, supporting social interaction and community cohesion; • Protect people from discrimination under the Equality Act, across all protected characteristics; and • Support inclusive decision-making and local empowerment, in line with the Localism Act.
Communities Human health	• Support mental health and early intervention, including through national strategies and local programmes; • Use green infrastructure to support wellbeing and reduce health impacts from pollution; • Promote fairness and inclusion through equality impact analysis and accessible service design; • Enable and support healthy lives through planning, especially in deprived communities; • Consider impacts on public health and standards of living; and • Ensure that development modifications consider impacts on human health.
Communities Noise	• Avoid, prevent, or reduce harmful effects of environmental noise through complying with mapping and action plans; • Avoid, prevent, or reduce harmful effects of environmental noise; and • Control environmental, neighbour, and neighbourhood noise to protect health and quality of life.
Communities Landscape	• Recognise and protect landscape character; • Comply with access and conservation requirements in identified areas; • Consider impacts on landscape features and designated areas including National Parks; • Protect and enhance valued landscapes, soils, and sites of geological importance; and • Use landscape character as a spatial framework to evaluate sensitivity and guide development.
Communities Cultural heritage	• Ensure that works comply with protections for archaeological sites and scheduled monuments; • Protect archaeological heritage as a source of collective memory and scientific study; • Conserve and enhance heritage assets including World Heritage Sites, listed buildings, and conservation areas; • Comply with protections for listed, and historic buildings and conservation areas; and • Consider the conservation and enhancement of historic heritage.
Economics	• Support economic growth and productivity, with an emphasis on business investment, expansion, domestic supply chain and adaptation;



Topic	Key messages from review
Macro-economic impacts	• Consider the benefits of creation of economic prosperity and investment; • Promote a dynamic economy that supports innovation, diversification, and green growth; • Support emerging technology growth and new jobs creation; • Support investment in long term needs of AI and enable access across the UK to its technology; • Recognise the benefits of digitalisation to UK economy and ability to benefit regions; • Create a pro-innovation regulatory environment whilst protecting public trust; • Support socio-economic resilience of communities and working conditions for people; and • Protect consumer from elevated pricing and support a fair transition.
Economics Infrastructure and security	• Expand renewable energy generation and recognise the importance of reducing dependence on imported fossil fuels; • Support the transition to renewable energy, including wind, solar, and hydrogen; • Achieve net zero emissions by 2050 through clean energy investment and innovation; • Consider infrastructures wider role in security of energy supply, net zero, ability to position the UK as a leader in clean energy and bring down consumer prices for energy; • Consider the sector pathway for emissions reduction and benefits of industrial clustering and technological innovation; • Promote green infrastructure networks to support biodiversity, climate resilience, and public wellbeing; • Consider the suitability of supporting infrastructure and resources for data centres, as well as data centres core role in the UKs infrastructure strategy; • Consider integration with broader UK infrastructure investment; • Enhance cyber security and protect critical infrastructure; • Ensure that national security concerns are factored into design and siting of infrastructure, including ability to generate strategic advantage and increase network resilience; • Ensure that developments are designed and sited with consideration of resistance to threats and hazards, ability to maintain operations, system adaptability and ability to respond and recover to disruption; and • Consider the vulnerability and resilience of CNI at a system level.
Resources Water	• Water extraction for cooling and the associated discharges will require permitting at a site level; • Reduce or avoid harmful water abstraction; • Prevention of pollution of groundwater and protection of it as a resource; • Improve water quality and ecological health by 2030 and support sustainable water use; • Consider long term implications of climate change in water resource planning and actively manage demand; • Address serious water stress and plan for future supply and demand challenges;



Topic	Key messages from review
	• Ensure suitable water and wastewater infrastructure is available or able to be provided to support developments; and • Manage flood risk from groundwater, surface water, and ordinary watercourses through strategic planning.
Resources Soil, land, minerals and agriculture	• Promote sustainable soil management to combat land degradation and support climate resilience; • Restore degraded soils and reduce pollution through EU-wide soil health strategies; • Protect and enhance soils and sites of geological value through planning policies and decisions; • Identify and safeguard geodiversity assets and integrate them into spatial planning; • Incorporate geodiversity into development design and restoration to support sustainable land use; • Restore historically contaminated land pollution and prevent further contamination; • Consider the competing demands for land, including wider policy ambitions for housing; • Increase the housing supply by identifying sufficient and varied land where it is needed; and • Provide an appropriate mix of housing types to meet the needs of all community groups.
Resources Circular economy	• Ensure that waste minimisation and resource efficiency are considered; • Consider benefits to human health and the environment from preventing and reducing waste; • Enhance waste and resource management to support circular economy principles; • Support zero avoidable waste by 2050 and eliminate avoidable plastic waste by 2042; and • Consider the value of closed loop resource systems and retaining critical minerals.



4.0 Baseline information and key issues

4.1 Introduction

The SEA Regulations require identification and characterisation of:

- ‘The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ (Schedule 2, Paragraph 2).
- ‘The environmental characteristics of areas likely to be significantly affected’ (Schedule 2, Paragraph 3).
- ‘Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance’ (Schedule 2, Paragraph 4).

This chapter summarises baseline information for the UK (with a particular focus on England) to inform the assessment of the NPS-DC across the environment, social and economic lens. The AoS process does not require collection of primary data, instead relying on the analysis of existing information. Baseline indicators have been selected for their ability to provide objective data that will offer an insight into general trends taking place, over time. The baseline topics considered are listed in Table 5 below.

Table 5: Themes and topics established in the AoS

Theme	Topic
Climate change	Greenhouse gas emissions
	Climate change resilience
Natural environment	Air quality
	Biodiversity, flora and fauna
Communities	Population
	Human health and wellbeing
	Landscape, townscape
	Historic environment
Economics	Infrastructure and security
	Macro-economic
Resources	Water quality and resources
	Soils, land, minerals and agriculture
	Circular economy

4.2 Key sustainability issues

The SEA Regulations require the identification of any existing environmental problems relevant to the plan or programme, particularly those affecting areas of notable environmental importance. Alongside this, the AoS has also considered socio-economic challenges to provide a comprehensive view of sustainability. The assessment was revised following the consultation period to reflect feedback received from Natural England and Heritage England.



The review of relevant plans, programmes and policies (Section 3.1), together with the analysis of baseline conditions and the likely developments in the absence of the NPS-DC, has identified a number of key issues. These issues, along with their implications and potential opportunities for the NPS-DC, are summarised in Table 6. Given the geographical scope of the NPS-DC, the summary of key sustainability issues primarily focuses on England, with consideration of the wider UK context only as appropriate.

It is important to recognise that some issues are interconnected and span multiple topics. For instance, climate change can influence biodiversity, water resources, flood risk, and landscape character. Table 6 also illustrates how these issues relate to the AoS Objectives outlined in the next chapter.



Table 6: Key sustainability issues identified and likely evolution without the draft NPS-DC

Baseline Assessment	Sustainability Issue(s)	AoS Objective
Climate change, greenhouse gases		
Under current policies and projections, the carbon budget for 1.5°C would be spent by 2030, with exceedances of 1.5°C by the 2030s⁴. This will occur whether an NPS on data centres is created or not, with warming inevitable in the short term⁵. Under current policies to reduce emissions, demand for electricity consumption will likely increase, as industries electrify and fossil fuels such as gas, petrol or diesel, are phased out for sectors including residential and commercial buildings, industry and transport. This will place increasing demand for power on the national grid. It is possible that this demand will be met by a combination of nuclear, wind and hydrogen as set out in the sixth carbon budget⁶.	Meeting the emissions reduction targets relies on electrification of key technologies, including buildings and industry. To support the electrification and meet net zero targets, the grid must both replacing existing fossil fuel sources and add new supply through renewables to meet rising demand. This is hampered by existing grid connection constraints. The requirement for data centres to be operating 24/7, conflicts with the intermittency of several renewable power sources including solar and wind. The ability to assure ongoing operations may result in backup energy or storage solutions being explored by industry, independent of the national grid. Depending on the solutions selected, these may be higher emitting sources, conflicting with net zero targets.	To minimise greenhouse gas emissions and support the transition to a net zero economy
Climate change resilience		
Under current policies and projections, the carbon budget for 1.5°C would be spent by 2030, with exceedances of 1.5°C by the 2030s⁷. In this case, the UK will continue to experience the effects of climate change, including changes to temperature, rainfall and related hazards. Data centres will continue to be required as digitalisation and AI use are expanded. With the UK government supporting data centres and AI as a source of economic growth, the sectors growth can be assumed with high	Increasing temperatures particularly in summer are likely to increase energy demand for cooling, particularly in the South East. This will be experienced not just for data centres, but also in residential and commercial buildings increasing peak demand. The ability for data centres to cool themselves during these periods will be important to maintain reliability in data centres and energy pricing. Increasing frequency and severity of weather hazards from both wetter winters and hotter summers, means that data centres may be exposed to a variety of risks affecting their ability to perform.	To maximise adaptation and resilience to climate change

⁴ (Committee on Climate Change, 2025)

⁵ (Committee on Climate Change, 2025)

⁶ (Committee on Climate Change, 2020)

⁷ (Committee on Climate Change, 2025)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
certainty. Depending on the efficiency of their systems and exposure of the location, they may be vulnerable to greater climate hazards or use private energy sources to meet their needs.	Clustering of data centres may present network resilience risks if there is an extreme weather event in that location.	
Natural resources, air quality		
Although measures to manage air pollution exist in England and have been particularly effective in London, in the absence of a NPS-DC, the existing pattern of facilities clustering near cities with already high air pollution levels is likely to continue. This is especially relevant in and around major cities, where strong connectivity to existing infrastructure and proximity to users attract development. Data centres with installed diesel generating capacity are potential point sources of NOx emissions, so have the potential to impact local air quality⁸. Without policy intervention, local communities and habitats near data centre clusters may experience harm from increased levels of pollutants.	Poor air quality remains the UK's single greatest environmental health risk, linked to tens of thousands of premature deaths annually. Even with major reductions in pollutants since 1990, almost all communities remain at times exposed to levels that the WHO considers harmful. Lower-income and urban populations are disproportionately affected by poor air quality. Data centres, which cluster in urbanised areas, risk adding to pressures in already vulnerable communities. Over 500 AQMAs are currently designated across England. Siting data centres in or near AQMAs could directly conflict with local authority Air Quality Action Plans and emission reduction targets. While not constant emitters, diesel backup generators can produce significant acute air pollution events when used, releasing nitrogen oxides and fine particulate matter. This is a particular issue where centres are concentrated near residential areas. Data centres currently consume around 2.5% of UK electricity, with rapid growth projected due to AI. Where this demand is met by fossil fuel generation, associated emissions could undermine progress on national air quality targets. Air pollution can have adverse impacts on the natural environment across both terrestrial and freshwater environments. Pollution may cause harm through deposition of acid or excess nutrients.	To minimise emissions of pollutant gases and particulates and protect air quality

⁸ (WBPS, 2024)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
Biodiversity, flora and fauna		
Without the NPS-DC, biodiversity will continue to be under pressure from development and climate change. Targets set by the Environment Act 2021, including BNG to ensure that development has a measurably positive impact on biodiversity, would need to be achieved via local planning policies and development control at the local level. Without the NPS-DC, there may be less co-ordination of nationally significant infrastructure and large-scale land uses, and this could potentially work against the goals of nature recovery networks in England.	England is one of the most nature-depleted countries globally, with over 40% of species in long-term decline since 1970. Despite designations such as SPAs, SACs, Ramsar sites and SSSIs, many protected areas are in unfavourable or deteriorating condition. Data centre development risks indirect impacts on these protected areas through land use change, air and water pollution or infrastructure expansion. Existing drivers of biodiversity decline (agriculture, urbanisation, climate change) are compounded by development. Large-scale data centre rollout could intensify biodiversity decline. Land for construction and operation is essential for data centre growth, and this land use can impact biodiversity by contributing to habitat loss, fragmentation and disruption of local ecological systems. National targets for restoring ecosystems and bringing protected sites into favourable condition by 2042 are challenging. Siting and expanding data centres without careful alignment with biodiversity goals risks deepening this policy gap.	To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality (linked to separate HRA process for NPS-DC)
Communities, population and human health and noise		
England's population is projected to grow by 14.5% between mid-2022 and mid-2047, reaching approximately 65.4 million, making it the fastest-growing nation in the UK ⁹ . This growth will be driven entirely by net international migration, as natural change (births minus deaths) is expected to turn negative from 2029 onwards. Over the 25-year period, deaths are projected to exceed births by more than 1.1 million, reflecting the country's aging demographic profile. ¹⁰	Upgrades to local infrastructure (e.g., energy, transport, housing) will be required for data centres, which can make areas more attractive for residential and commercial development, influencing population density. Poor air quality is linked to respiratory and cardiovascular diseases, especially in urban and deprived areas. Data centres sited in areas with populations already exposed to high pollution levels, may exacerbate existing health risks.	To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities

⁹ (Office for National Statistics, 2025)

¹⁰ (Office for National Statistics, 2025)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
Population growth is also expected across all English regions, with 302 out of 309 local authorities projected to experience increases by 2032. There is a rise in longstanding conditions, and in 2022, 41% of adults had at least one longstanding illness. The most common were musculoskeletal (14%), mental health (11%), and cardiovascular conditions (9%) and the prevalence is expected to rise with ageing demographics¹¹. The adults living in the most deprived areas also experience significantly worse health outcomes compared to those in more affluent regions. These disparities are not only persistent but are projected to widen in the absence of targeted public health interventions and equitable access to healthcare services¹². Recent data from the GHQ-12 mental health screening tool revealed that Women (21%) were more likely than men (16%) to score 4+ on the GHQ-12, indicating probable psychological distress and suggesting that women are experiencing higher levels of mental strain compared to men. Looking ahead, mental health needs are expected to increase, especially among younger individuals and deprived populations¹³.	Data centres generate heat and require cooling, which can intensify urban heat and lead to heat stress that disproportionately affects older adults and those with chronic conditions. Piling, excavation, and HGV traffic can cause short-term disturbance but are controllable through Construction Environmental Management Plans (CEMPs). There is a potential risk of noise from continuous use of chillers, HVAC, fans, and standby generators. Continuous noise exposure can reduce health outcomes for site personnel and surrounding communities, including in certain cases, increased susceptibility to mental health conditions such as depression, anxiety, suicide, and behavioural problems in children and adolescents. Noise may also adversely influence the behaviour and health of wildlife. Receivers such as homes, schools, hospitals, and tranquillity areas such as National Landscapes and National Parks, may be more sensitive to noise impacts. Infrastructure should be designed and operated in such a way as to be resilient to risks that could result in major detrimental impacts on the availability and integrity of essential services which if compromised could have significant impacts economically or socially. If not considered at a wider network, data centres may be vulnerable to disruption. Wellbeing can be related to individuals' feelings of connection and belonging, which can be enhanced through relationships with the heritage environment. Access to greenspaces and recreational outdoor environments like trails and public footpaths can contribute to wellbeing and human health for communities.	

¹¹ (NHS England, 2024)

¹² (NHS England, 2024)

¹³ (NHS England, 2024)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
Landscape		
Natural England is working to designate 25 new National Nature Reserves by 2027 and improve the condition of existing protected landscapes. By 2029, the Natural Capital and Ecosystem Assessment (NCEA) programme will deliver a baseline assessment of England's natural assets, including landscape condition, to guide sustainable land use and policy decisions¹⁴.	Large-scale data centres can alter the visual character of rural and protected landscapes, especially near National Parks or Areas of Outstanding Natural Beauty (AONBs). Data centres substantial energy needs which may require additional energy infrastructure, this can lead to land use conflicts in ecologically valuable or visually sensitive areas	To conserve, protect and enhance landscape and townscape quality and visual amenity
Historic environment		
Without the NPS-DC, there is potential for data centre proposals to continue to be approved at the local level, rather than being considered as nationally significant infrastructure. This could lead to a less co-ordinated approach, whereby standards of design may differ, which could lead to cumulative degradation of the setting and/or loss of heritage assets. As NPSs have a strong alignment with NPPF, it will likely embed a strong policy against harm to heritage assets.	Data centres can disrupt the visual integrity and historic character of significant landscapes and townscapes, especially near listed buildings or conservation areas. Construction of new data centres has the potential to disturb buried archaeological remains, leading to permanent loss of irreplaceable heritage assets. Historic environment contributes to identity, tourism, and community well-being (and associated economic growth), and large-scale development poses a risk to these values if not carefully managed.	Conserve and enhance historic environment assets and their settings, and the wider historic environment
Local economies		
The UK government estimated that £45 billion of private investment has been committed to the sector since July 2024, with estimates that nearly 100 new data centres could be built in the next five years with resulting job creation related to the delivery and operation¹⁵. Investments may be spread across data centre infrastructure, IT equipment such as servers' storage and	Data centres are recognised as critical national infrastructure, supporting digital services and attracting skilled workers, which can lead to population shifts toward regions with data centres. Demographic pressures may affect labour availability for construction and operations, while increased reliance on digital services is expected to reinforce demand.	Support local economies and promote opportunities to improve education and skills, and employment

¹⁴ (Department for Environment, Food & Rural Affairs, 2025)

¹⁵ (Clark, Nuala, Stewart, & Woodhouse, 2025)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
network infrastructure, and power generation and transmission¹⁶. The government is committed to achieving nationwide gigabit coverage and expects 99% of premises to have access to a gigabit-capable connection by 2032¹⁷. Work is being undertaken to speed up grid connections to the transmission and distribution network¹⁸. The government has also announced that industries like data centres and AI, wind and solar will be prioritised for grid connections¹⁹. Whilst data centres themselves provide limited direct employment opportunities, there is a demand for candidates with AI and data skills, the Office for AI research showed that 110,000 vacancies in 2020 for data science and AI roles, indicating there is a growing demand for these skills²⁰. Without the NPS-DC, it is likely that the demand for increased data centre services will continue. Data centres may be located and designed less optimally driven by private sector interests and with less regard to interests for national security or resilience of the network.		
Macro-economy and infrastructure		
[as above]	The delays to grid connection pose a bottleneck risk to data centre development, if unable to source energy from the grid this could slow down development or result in independent energy sources being used. The demand for energy may also raise energy prices, acting	To promote a strong, diverse, and stable economy

¹⁶ (McKinsey & Co, 2025)

¹⁷ (Project Gigabit, 2022)

¹⁸ (Ofgem, 2023)

¹⁹ (OfGem, 2025)

²⁰ (Department for Digital, Culture, media & Sport; Office for Artificial Intelligence; Department for Science, Innovation and Technology, 2021a)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
	against the UK's goals to reduce the cost of electricity for consumers. Making electricity cheaper is a key policy lever in encouraging industries to switch from fossil fuel energy sources. Whilst the UK's emissions targets require industry to increase the proportion of energy from electricity rapidly, high electrical prices are a barrier to switching, and the ratio of industrial electricity-to-gas prices remains above 4:1. Increasing the demand on electricity networks, without additional (renewable) sources available could slow down this switching. Increasing frequency and severity of weather hazards from both wetter winters and hotter summers, means that data centres may be exposed to a variety of risks affecting their ability to perform. Clustering of data centres may present network resilience risks if there is an extreme weather event in that location.	
Security		
[as above]	Infrastructure should be designed and operated in such a way as to be resilient to risks that could result in major detrimental impacts on the availability and integrity of essential services which if compromised could have significant impacts economically or socially. If not considered at a wider network, data centres may be vulnerable to disruption. The delays to grid connection pose a bottleneck risk to data centre development, if unable to source energy from the grid this could slow down development or result in independent energy sources being used. The demand for energy may also raise energy prices, acting against the UK's goals to reduce the cost of electricity for consumers. Data centres have historically operated on a short design life of 10–15 years, with frequent replacement of costly, energy-intensive equipment. National ambitions support moving away from a linear model of resource consumption, e.g., extraction, manufacturing and disposal, and towards a circular economy model of resource management.	Promote the national security of the UK



Baseline Assessment	Sustainability Issue(s)	AoS Objective
Water		
AI's dependence on large-scale data centres can place heavy demands on water. The UK is already expected to face a shortfall of around 5 billion litres of water per day by 2055²¹. Without an NPS-DC, the expansion of data centres could intensify local water scarcity. Many of the UK's proposed or existing data centres are in areas already facing severe water stress. Existing planning mechanisms, such as the 2025 water resource management plans, do not fully consider the additional water needs of data centres. Furthermore, as data centres do not have to report on the amount of water used; the Environment Agency has limited ability to predict shortfalls²². Enhanced transparency for regulators would support future infrastructure planning, allowing communities to evaluate environmental impacts and provide reliable data to guide policymaking on sustainable growth. This will ensure water use is properly monitored and sustainability and environmental impacts are given priority.	Data centres can require large amounts of water for cooling, which can exacerbate water scarcity in sensitive landscapes. This can threaten natural habitats, especially in water-stressed regions. Data centres are currently concentrating in the South East, where there is predicted to be the greatest risk posed by climatic factors that they are vulnerable to, such as high temperatures and water scarcity. The UK currently faces a projected daily water deficit of five billion litres by 2050. Several regions where data centres are being proposed are officially designated as “seriously water stressed,” and may directly compete with domestic, agricultural and industrial needs. In areas where groundwater is used, there is a risk of dewatering causing damage to underground archaeology features or causing subsidence that damages aboveground structures. AI's reliance on high-powered data centres may amplify pressure on water resources, depending on the technology used. Data centre water consumption can extend beyond cooling systems. Electricity generation from fossil fuels, nuclear and hydro also has high water demands, meaning the sector's total footprint can be significantly larger when indirect use is considered. The sector does not consistently report water consumption, making it difficult to assess cumulative impacts. This can make it challenging for regulators to plan infrastructure needs, assess impacts on local communities and determine if growth is sustainable. Construction of centres may affect local water quality through chemical use, adding to pressures on local supplies. Current frameworks do not adequately account for digital infrastructure in long-term demand forecasts. This omission can risk	To protect, enhance and increase resilience of water quantity and quality

²¹ (Environment Agency, 2025)

²² (Horton H. , 2025)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
	undermining carefully modelled supply–demand balances and national water security.	
Soil, land, minerals and agriculture		
By 2050, England’s land use is predicted to shift significantly, with farmland shrinking by up to 30% to make space for woodland, peatland restoration, renewable energy and housing. Around 1.5m hectares of new woodland, 1.2m hectares of energy crops, and 0.3m hectares for infrastructure may be required, driving a major rebalancing of land towards climate mitigation, biodiversity and development²³. Soil degradation and poor soil management is a continual trend. Peat soil, the organic layer of a soil that consists of partially decomposed organic matter, acts as a significant natural carbon sink. However, with expected future sea level rise resulting from climate change, many peat topsoils could disappear within decades. Whilst losses in peat soil are highest, arable soil losses are also of concern²⁴. In 2040, the world is expected to require four times the amount of critical minerals for clean energy technologies as it does today. China largely controls the mining and refining of rare earth elements, in which its dominance is expected to last, at the minimum, until 2040. Data centres could add to the existing pressures on soil quality, alongside intensive farming, pollution, landfill and urban development. Without strategic planning, uncoordinated development risks adding pressures on soil productivity and farmland in England.	Growing population densities increase land and energy competition in urban areas, requiring proactive planning to balance data centre expansion with residential and commercial needs. Data centres may seek large, flat, well-connected sites close to major cities. These areas often overlap with green belt and high-value agricultural land, creating potential for conflict with local communities. Recent proposals for data centres on farmland and green belt land in England have had local opposition, highlighting tensions between digital infrastructure, agricultural resilience and community needs. In some regions, high demand from data centres has constrained electricity grid capacity, delaying or limiting new housing developments. This illustrates how data centre expansion can indirectly compete with housing growth by absorbing scarce infrastructure resources. Conversion of agricultural or semi-natural land for development (such as data centres) can exacerbate soil degradation. As English arable soils have already lost 40-60% of their organic carbon, further degradation would undermine biodiversity goals.	To conserve and enhance soil health and geology and contribute to the sustainable use of land

²³ (Savills, 2019)

²⁴ (The Soil Association, 2021)



Baseline Assessment	Sustainability Issue(s)	AoS Objective
Circular Economy		
Discussions across industries are converging on the importance of sustainability, with circularity emerging as a central theme. However, without an NPS-DC, the rollout of data centres may persist in a linear resource model, overlooking opportunities to embed circular principles such as resource efficiency, reuse of materials and minimisation of waste. With growing policy emphasis on circularity, including the government's forthcoming Circular Economy Strategy, pressure on industry to adopt circular approaches is expected to increase. In the absence of an NPS-DC and tailored guidance connecting data centre development to circularity, the sector risks missing the opportunity to align with national climate and resource efficiency goals.	The Circular Economy Taskforce (est. 2024) and forthcoming Circular Economy Strategy (expected autumn 2025) mark a significant policy shift. Prioritisation of textiles, transport, construction, agri-food, chemicals and plastics will drive innovation but also raise compliance expectations across industries, including digital infrastructure. Large-scale construction of new centres risks contributing significantly to C&D waste, with sustainability depending on whether materials can be designed for reuse and recovery. Electronic waste from servers and other IT equipment is a growing concern. Devices may be replaced due to software or system upgrades rather than hardware failure. Complex material composition makes reuse, repair, and recycling difficult. The data centre sector risks overlooking circular practices such as modular design, refurbishment, scalable recycling and resource recovery (e.g. heat capture for district heating). This could result in misalignment with national sustainability goals.	Promote sustainable waste management and resource use



5.0 Assessment of the draft NPS for data centres

5.1 Introduction

This section presents the AoS findings for data centres, addressing each AoS Objective individually. Sustainability issues and effects that span multiple topics are discussed where most relevant to avoid repetition. Interconnections between topics, along with any significant secondary, synergistic, or cumulative effects, are highlighted where appropriate. Where notable adverse impacts are identified, potential mitigation measures are outlined.

The AoS applies the mitigation hierarchy, prioritising harm avoidance first. Where avoidance is not possible, mitigation and enhancement measures are recommended. All assessments carry a degree of uncertainty, as the level of impact depends on the specific characteristics of the data centre and its location (or alternative locations).

For each AoS Objective, the assessment follows two steps:

- First, identifying the anticipated effects of the infrastructure outlined in the draft NPS-DC.
- Second, evaluating how the draft NPS-DC policies address the AoS guide questions, before concluding on the likely residual effects.

Cumulative effects are considered together in Section 7.0.

5.2 Coverage of the draft NPS for Data Centres

A draft version of the assessment, with recommended mitigations was prepared and shared with BIST, following this review, changes were made to the draft NPS-DC. The AoS has been updated to reflect the adoption of recommendations and mitigations. As a result of these changes, the draft NPS-DC has generally addressed all potential effects and issues identified in the Scoping Report and framework. Details of the difference the AoS has made to the final NPS-DC will be addressed in the AoS Adoption Statement.



5.3 Assessment of the draft NPS-DC

5.3.1 AoS Objective 1: To minimise greenhouse gas emissions and support the transition to a net zero economy

5.3.1.1 Anticipated Effects

The NPS-DC has the potential to enable faster delivery of infrastructure with significant energy consumption requirements. This could increase demand on the national grid and, in some cases, lead to the use of independent energy infrastructure such as diesel backup generators. Such measures may adversely affect the UK's commitment to achieving net zero greenhouse gas (GHG) emissions by 2050 and transitioning to a net zero economy. Additional GHG emissions may also arise during the construction phase and through changes in land use, including the removal or alteration of carbon sinks.

In preparing the NPS-DC, it is essential to ensure that the potential for generating GHG emissions is significantly reduced and that progress towards a net zero economy is not compromised. This should be achieved through the promotion of low-carbon energy sources and energy efficiency as core components of data centre development. The NPS-DC should also, wherever possible, ensure that data centre development avoids or minimises impacts on carbon sinks such as tree cover and peatlands, and seeks opportunities to enhance them through restoration or increased tree cover where practicable.

5.3.1.2 Assessment against the objective

The draft NPS-DC acknowledges the government's commitment to achieving net zero emissions by 2050 and advises applicants to consider UK climate projections. It also directs that the Secretary of State should take these projections into account during the decision-making process. The draft NPS-DC notes that efforts to limit the impact of development on climate change should be reasonable and proportionate to the benefits of data centres.

The draft NPS-DC section titled *Criteria for Good Design* addresses the efficiency of data centres and how technologies can maximise benefits while minimising energy use. It recommends establishing a project board-level champion role to focus on maximising value through design and consideration of alternatives. The consideration of alternatives requirement is strengthened directing applicants to set out their decision rationale if a less resource-efficient design option is selected.

The draft NPS-DC recognises the importance of sustainability in design and identifies data centres as resource intensive. The draft NPS-DC directs applicants to consider how they can minimise consumption of resources (specifically energy and water) through technology or mitigation strategies. The Secretary of State must be satisfied that data centre designs are sustainable and efficient. The draft NPS-DC directs applicants to demonstrate this to the Secretary of State through following and incorporating best practice design guidance.

There is an expectation that the design will aim for maximum Power Usage Effectiveness (PUE), a globally recognised measure of data centre energy efficiency. A lower PUE indicates a more efficient data centre, making this a useful metric for monitoring energy performance. To incentivise design efficiency, the draft NPS-DC could be strengthened by identifying a desirable PUE performance range for data centres and requiring the implementation of a monitoring regime once operational. This would confirm that data



centres are performing at the expected level of efficiency, with corrective measures applied if performance standards are not met. An additional benefit of monitoring would be improved visibility of energy demand and associated greenhouse gas (GHG) emissions.

The draft NPS-DC acknowledges that delays in securing grid connections present a significant barrier for data centre developers and can postpone centres becoming operational. However, a confirmed grid connection is not a prerequisite for submitting an application. In the cases where electricity network connections are constrained the draft NPS-DC encourages applicants to consider alternative solutions to power the data centre, one option of which may be Behind-the-Meter (BtM) power generation. It is desirable that data centres are connected to the grid to ensure a secure energy supply for operations and to minimise reliance on fossil fuel sources, such as gas, which emit greenhouse gases. The Secretary of State must be satisfied that grid connection has been given sufficient consideration by the applicant.

The government is preparing a new framework to establish the conditions by which a limited number of strategically important projects may make time-limited use of BtM power generation. For projects assessed by government as being strategically important, the framework will require applicants to demonstrate:

- That the use of BtM power generation cannot reasonably be avoided, reflecting the government's strong preference for grid-connected power *followed by renewable or low carbon sources of electricity to power the data centre*;
- How they will minimise the capacity, duration and emissions impacts of BtM power deployment, so that BtM power generation operates only as a transitional source of power and not as a long-term source of power; and
- How the project will deliver wider energy system, decarbonisation and economic benefits beyond powering the data centre itself.

Applicants should assess the GHG emissions associated with the operation of the data centre in the Environmental Statement, including any primary and back up electricity generation as well as their electricity consumption. Applications which *are coordinated to bring improved efficiency and lower comparative requirements from the grid, are particularly encouraged*.

The draft NPS-DC requires applicants to demonstrate how they are limiting the impact of the development on climate change, for example by sourcing renewable supplies of electricity.

The draft NPS-DC suggests that applicants consider opportunities for heat reuse, reflecting its potential contribution to energy efficiency and the supply of low carbon heating via heat networks to local homes and businesses. Heat reuse will be given positive weighting in the decision-making process.

Where any application includes BtM power generation, the Secretary of State will have regard to the extent to which the applicant has applied, and is compliant with, the forthcoming framework on BtM power generation. The impact of proposed BtM power generation on the security of supply of the gas and electricity system will be considered and BtM power generation will not be approved if the data centre project does not comply with the forthcoming framework or is not deemed to be strategically important.



Any operational emissions, including those resulting from BtM power generation for those projects consented under the forthcoming framework, will be addressed by the government in a managed, economy-wide manner, in accordance with the carbon budgets and the net zero target and to ensure consistency with the UK's international climate commitments. Therefore, the contribution of operational emissions arising from individual planning applications to the achievement of carbon budgets, the net zero target, and the UK's international climate commitments will not be assessed.

The NPS-DC encourages the preparation of measures to support climate change adaptation and to maximise the use of nature-based solutions alongside other conventional techniques.

Data centres can occupy large areas of land, and where located on greenfield sites, there is a risk that carbon sinks or stores will be lost or adversely affected by development. The draft NPS-DC explicitly directs applicants to follow the mitigation hierarchy where there are likely significant impacts on the environment. This can be enhanced by considering not only their ecological value but also their role in mitigating GHG emissions, and the reduction or removal of this function as a result of the project.

The draft NPS-DC also states that existing trees and woodland, which act as natural carbon sinks, should be retained wherever possible and refers to the Government's commitment to increasing tree canopy and woodland cover to 16.5% of England's total land area by 2050.

5.3.1.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified the potential for the draft NPS-DC to result in uncertain effects against this objective. The draft NPS-DC addresses important issues relating to greenhouse gas emissions, however, as use of fossil fuel sources has not been ruled out and greater energy consumption is expected, there is still the potential for adverse effects.

The government is preparing a new framework to establish the conditions by which a limited number of strategically important projects may make time-limited use of BtM power generation and the draft NPS-DC sets out the requirements that will need to adhere to through the framework. However, at this stage, the scale and number of applications likely to require BtM power generation is uncertain.

The assessment of the relevant policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 7.



Table 7: AoS Objective 1: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
1: To minimise greenhouse gas emissions and support the transition to a net zero economy	Indirect	High	Long	National	Permanent / irreversible	Uncertain

5.3.1.4 Mitigation and enhancement measures

The following measures are recommended to mitigate/enhance the draft policies achievement of this objective. It is recommended that:

- The draft NPS-DC identify a desired PUE performance range for data centres and requires that a monitoring regime is implemented once operational, to confirm that data centres are performing at the expected level of efficiency, with corrective measures implemented if performance levels are not achieved. A further benefit of monitoring would be visibility of the energy demands of data centres, and associated GHG emissions.
- The Framework supporting decision making around BtM needs to provide clarity on the number and scale of applications that will be permitted to use BtM. The detail within the framework would need to be assessed to ensure that compliance will mitigate potential effects.

5.3.2 AoS Objective 2: To maximise adaptation and resilience to climate change

5.3.2.1 Anticipated Effects

The climate continues to warm, with 2025 recorded as the UK's hottest summer, breaking historical records. Future changes in climate are expected to alter rainfall patterns and increase flood risk. Greater resilience to the unavoidable impacts of climate change, including changes in weather patterns, sea level rise, and erosion, must be considered.

Data centres are particularly vulnerable due to the need to maintain equipment at correct operating temperatures. Some adaptation risks can be mitigated through the use of blue and green infrastructure, for example, to absorb surface water and reduce flooding or to lower ambient temperatures. Blue and green infrastructure can also provide benefits for biodiversity, serving a dual purpose. Reducing exposure to temperature fluctuations can further improve energy efficiency by reducing the energy required to maintain acceptable temperatures during peak summer periods.



5.3.2.2 Assessment against the objective

The draft NPS-DC directs applicants to government guidance and industry standard benchmarks such as the Climate Impacts Tool, and the British Standards for Climate Change Adaptation (ISO 14090:2019) in accordance with the EIA Regulations. The draft NPS-DC requires applicants to demonstrate that proposals have a high level of climate and energy resilience built-in from the outset and to demonstrate how proposals can be adapted over their predicted lifetimes to remain resilient to a credible maximum climate change scenario. These results should be considered alongside relevant research which is based on the climate change projections. It states that applicants are expected to take necessary actions to ensure data centres remain operational throughout the lifetime of the infrastructure in their intended manner. The draft policy explicitly identifies climate adaptation risks that applicants should address, including direct (e.g. site flooding, drought and limited water availability, storms, heatwave and wildfire threats to infrastructure and operations) and indirect (e.g. access roads or other critical dependencies impacted by flooding, storms, heatwaves or wildfires).

The draft NPS-DC grants the Secretary of State powers to consider climate change adaptation across the application as a whole. The Secretary of State will also consider how designs demonstrate that climate forecasts have been considered and how the applicants plan to keep the site operationally sound throughout its expected life.

The draft NPS-DC highlights the Government's Flood and Coastal Erosion Risk Management Policy Statement and advises that industry should consider updates to Government policy and apply revised approaches as a priority. Applications are required to include a flood risk assessment where they are located in Flood Zones 1, 2, or 3. Applicants must demonstrate how flood risks will be managed, taking climate change into account, and consider the need to maintain operations during a flood event.

The draft NPS-DC sets out a range of sustainable drainage systems that applicants can use to address and manage flood risk, and encourages applicants to make as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management.

Sustainable drainage systems include references to blue and green infrastructure such as swales, basins, and ponds. The dual benefits of blue and green infrastructure are recognised, and applicants are encouraged to seek opportunities for multi-purpose use of open space, such as wildlife habitat, amenity, and flood storage.

The draft NPS-DC specifically requires applicants to consider storms, heatwaves, and other extremes of weather in their building design, operations, and ancillary infrastructure (e.g., roads and power connectivity). This will help to ensure the infrastructure is capable of managing risks associated with extreme weather throughout its lifetime. While the dual benefits of blue infrastructure are acknowledged for flooding, greater emphasis should be placed on green infrastructure to mitigate extreme heat.

The draft NPS-DC directs that Local Flood Authorities should be consulted if a proposal affects or increases levels of flood risk. It is recommended that this requirement be enhanced so that, where a proposal increases flood risks or impacts third-party land, applicants should engage with flood authorities.



Development within a Coastal Change Management Area, or any area at risk from coastal erosion or tidal flooding within the next 100 years, should only be permitted where it can be demonstrated that the development will remain safe throughout its design life, is consistent with the relevant Shoreline Management Plan and does not adversely affect coastal processes, and delivers wider sustainability benefits that justify its location. Applicants should identify and implement appropriate mitigation measures to address adverse physical changes to the coastline, in consultation with the Marine Management Organisation, the Environment Agency, local planning authorities, relevant statutory consultees, Coastal Partnerships and any other appropriate coastal stakeholders. The Environment Agency may object to development on the grounds of flood risk. However, the Secretary of State can overrule concerns raised by the Environment Agency or Local Flood Authorities if satisfied that the applicant and the Local Flood Authority have taken ‘all reasonable steps’ to resolve issues. The draft NPS-DC clarifies that the Secretary of State must be satisfied that the risk of flooding is not increased elsewhere as a result of the development, unless any increased risk can be mitigated to an acceptable and safe level, taking account of the vulnerability of its users.

5.3.2.3 Assessment conclusions and summary

The assessment against the AoS Framework objective has identified that the draft NPS-DC has provisions for proposals to consider and respond to climate change adaptation matters in the design. This has explicitly set out key risks that ought to be considered and considers climate forecasts against sites expected operational life. Provisions are included which prioritise dual benefits of blue and green infrastructure for resilience, blue and green infrastructure can have benefits for resilience and biodiversity. Overall, the draft NPS-DC performs positively against the objective.

The assessment of the draft NPS-DC has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 8.

Table 8: AoS Objective 2: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
2. To maximise adaptation and resilience to climate change	Direct	High	Long	Localised	Permanent / reversible	Minor Positive



5.3.2.5 Mitigation and enhancement measures

The following measures are recommended to further enhance the draft policies achievement of this objective. It is recommended that:

- Whilst the dual benefits of blue infrastructure are acknowledged; greater emphasis is given to green infrastructure to mitigate against extreme heat; and
- The requirement to engage with local flood authorities is strengthened where a proposal increases flood risks or impacts third-party land, so that applicants *must* engage with flood authorities in this circumstance.

5.3.3 AoS Objective 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality

5.3.3.1 Anticipated Effects

Biodiversity refers to the variety of living species on Earth, including plants, animals, bacteria and fungi. The UK is considered one of the most nature depleted countries in the world. The key drivers of long-term biodiversity depletion were reflected in the UK's 2023 State of Nature Report and found to be: Intensive agricultural management (and changing use), climate change, and overexploitation.

Land for construction and operation is necessary for data centre growth, and this land use change can impact biodiversity by contributing to habitat loss, fragmentation and disruption of local ecological systems. Additionally, data centres' energy consumption can lead to increased GHG emissions and climate change, which is a major threat to England's biodiversity. It is important that the need for new data centres in England does not result in the further loss of biodiversity, and where possible, opportunities to restore and protect the natural environment are implemented.

5.3.3.2 Assessment against the objective

The draft NPS-DC encourages applicants to consult with the appropriate Statutory Nature Conservation Body (SNCB) and provide the relevant Secretary of State with sufficient information to determine whether an Appropriate Assessment is required alongside their application to support the protection of European designated sites (SPAs and SACs) and Internationally designated sites, Ramsar sites.

If an AA determines that development will affect the integrity of a European or Ramsar site, development consent may still be granted if it can pass the three legal tests:

- 1 There are no feasible alternative solutions that would be less damaging or avoid damage to the site.
- 2 The proposal needs to be carried out for imperative reasons of overriding public interest.
- 3 The necessary compensatory measures can be secured.

Appropriate weight should be given to designated sites of international, national, and local importance. The draft NPS-DC directs that applicants also consider local and regional sites such as regionally important geological sites, local nature reserves and local wildlife sites,



with sites mapped to understand the potential impact of development and the Local Nature Recovery Strategy (LNRS) can support this.

The draft NPS-DC adheres to the mitigation hierarchy and refers to the need to protect habitats, particularly those that are difficult or impossible to restore once impacted. The draft NPS-DC direct applicants to provide mitigation strategies for both direct and indirect effects of development on these habitats with a focus on irreplaceable habitats.

The draft NPS-DC includes wording intended to support the protection of habitats and species. Most development proposals will be subject to an EIA. In cases where an EIA is not required, the draft NPS-DC states that the applicant should provide environmental information proportionate to the site size and development impact to the Secretary of State. It is recommended that the draft policy wording be strengthened by defining the scope of 'environmental information,' and what level of information is 'proportionate'.

The Secretary of State should consider the objectives of the 25 Year Environment Plan and the Environmental Improvement Plan (EIP) when deciding on applications. The overarching ambition of the 25 Year Environment Plan is for the Government to leave the environment in a better state than it was found. The EIP seeks to significantly improve the natural environment in England and the draft NPS-DC includes the mandatory requirement for NSIPs to deliver a minimum of 10% Biodiversity Net Gain (BNG). The draft NPS-DC states that the Secretary of State may not grant applications for development consent unless satisfied that the proposed development meets the biodiversity gain objective as set out in the relevant biodiversity gain statement to which the development relates. Applicants should seek to exceed this threshold where practicable and applications that exceed 10% BNG will be favoured. Applicants are required to identify opportunities to enhance biodiversity through good design principles.

Where possible, the draft NPS-DC requires applicants to maximise the positive impact of their development on biodiversity, including the protection and restoration of habitats affected by development. LNRSs are identified as a source of information for applicants to identify opportunities. The draft policy could be enhanced by requiring applicants to explain where these opportunities have been taken up and, where they have not, provide justification.

5.3.3.3 Assessment conclusions and summary

The draft NPS-DC places emphasis on the protection of biodiversity and sets out the requirement for applicants to provide a minimum of 10% BNG, which should support biodiversity enhancement. However, the draft NPS-DC could potentially permit data centre proposals which have adverse effects on European or Ramsar site integrity and does not include wording to prevent data centre proposals locating within European or Ramsar sites. This creates the potential for loss and damage to existing designated sites. On balance therefore, as the NPS-DC could potentially lead to adverse effects on European or Ramsar site integrity, an uncertain effect has been recorded against this objective.

The assessment of the relevant policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 9.



Table 9: AoS Objective 3: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
3. To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality (linked to separate HRA process for draft NPS for Data Centres)	Direct	High	Long	Localised	Permanent /Irreversible	Uncertain

5.3.3.4 Mitigation and enhancement measures

As an uncertain effect has been identified, mitigation measures are required. The following mitigation measure has been recommended and is discussed in relation to the HRA below:

- The HRA which accompanies this report should also be referred to for mitigation measures. In addition to the above mitigations the HRA made recommendations for rewording. The majority of which were accepted, except for the key mitigation measure to not permit data centre proposals which have adverse effects on site integrity and wording to prevent data centre proposals to be located within European or Ramsar sites. Full details on the implications this has for the HRA are documented in Section 6.0 of the HRA Report. If adopted, this mitigation would improve the performance of the NPS-DC against AoS Objective 3 and remove the uncertainty identified. However, the mitigation has not been taken on board because it does not align with the Government's position to promote growth through the planning system for data centres and would contrast with the principle of Critical National Priority (CNP) status for data centres.

As the mitigation was not taken on board, the HRA progressed to Stage 3 Derogations which consists of three tests as outlined in Section 2.8:

Test 1 (Alternative Solutions): five alternative solutions were considered (1: Do Nothing, retaining a 'business as usual' approach; 2: NPS-DC with adoption of key mitigation measure; 3: Utilising National Development Management Plans (NDMPs); 4: Updating existing data centre sites with greater capacity; and 5: Increasing the use of overseas data centres) as well as alternative options for thresholds for national significance. None of the Alternatives 1 to 5 provide a more effective means of delivering the Government's strategic objectives for data centres and are less damaging to European or Ramsar sites in comparison to the draft NPS-DC. This was also the case for the threshold alternatives. Data centre project proposals will still be required to consider IROPI (imperative reasons of overriding public interest) in the context of their potential adverse effects on relevant European or Ramsar sites and



their qualifying features. Test 1 is passed as there are no alternative solutions at the plan level and Test 2 must be undertaken.

Test 2 (IROPI): it was possible to conclude that the draft NPS-DC is of imperative and overriding public interest. The benefits of nationally significant data centres and associated guidance within the NPS-DC will bring about far-reaching benefits to the public in the UK across numerous sectors as they underpin so many aspects of modern life. Specific data centre proposals will still be required to consider IROPI in the context of their potential adverse effects on relevant European or Ramsar sites and their qualifying features.

Test 3 (Secure Compensatory Measures): this test cannot be undertaken for the draft NPS-DC as it must be specific to the project and the adverse effects identified, if relevant. However, it is expected that securing satisfactory compensation measures could be achieved in all likely scenarios.

On the basis of the tests described above, the HRA has concluded that the draft NPS-DC can be adopted following completion of the HRA.

The following measures are recommended to enhance the draft policies achievement of this objective:

- Define the scope of ‘environmental information,’ and what level of information is ‘proportionate’; and
- Require applicants to explain where opportunities to enhance biodiversity outcomes have been taken up and, where they have not, provide justification.

5.3.4 AoS Objective 4: Conserve and enhance cultural heritage assets and their settings, and the wider historic environment

5.3.4.1 Anticipated Effects

The historic environment comprises a wide range of architectural, archaeological, and cultural assets, maintained by various private and public bodies, including Historic England. A significant number of archaeological assets in England remain undiscovered. The NPPF and Planning Practice Guidance require developers to assess and address the archaeological impacts of developments before planning permission is granted.

Local heritage such as buildings, monuments, sites, places, areas, historic parks and gardens, and other designed landscapes plays an essential role in shaping and reinforcing local character and distinctiveness within the historic environment.

Although the draft NPS-DC is site agnostic, it is expected that nationally significant data centres will locate on larger sites which may be in greenfield areas or those with limited extensive earthworks, this increases the potential of undiscovered archaeological features being present on site. Depending on the design and location of data centres, they may have adverse impacts on the visual setting and experience of heritage environments.



5.3.4.2 Assessment against the objective

The draft NPS-DC recognises that data centres, like other large development activities, has the potential to impact on both designated and non-designated historic assets and their settings, historic landscapes and archaeology.

The draft NPS-DC directs applicants to assess any likely significant heritage impacts as part of an EIA, with consideration given to possible and cumulative impacts. Assessments must also consider the effects of noise, vibration light and indirect impacts – proportionate to the significance of the impacted heritage asset. The draft NPS-DC covers both designated and non-designated heritage assets, archaeological remains and their setting, effectively encompassing the heritage environment.

A distinction is made in decision making to provide greater weight to heritage assets and their setting based on their significance, with the Secretary of State providing substantial weight to conservation of designated heritage assets. Substantial harm or loss of assets of high significance including (but not limited to) Scheduled Monuments, World Heritage Sites, Registered Battlefields, Grade I and II Listed Buildings, and Grade I and II Registered Parks and Gardens) should be wholly exceptional. Consent will also be refused if a proposal will lead to substantial harm to a designated asset, unless substantial public benefit clearly outweighs this harm and its optimum viable use.

For non-designated heritage assets, the Secretary of State will require clear and convincing justification for any harm to or loss of other heritage assets. A balanced judgement will be required with regard to the scale of harm or loss for non-designated heritage assets, considering their significance.

With relation to archaeological features, applicants are directed to carry out desk based research and if this is insufficient, a field evaluation. Where there is the potential for a site to have undiscovered heritage assets of archaeological interest the draft NPS-DC states that the Secretary of State will consider procedures to identify and treat assets during construction. It is recommended that the draft NPS-DC is enhanced by specifically directing applicants to record and conserve in situ, or record and remove, rather than ‘treatment’.

The applicant is encouraged, in addition to managing potential adverse impacts on heritage assets, to consider opportunities to make a positive contribution to the historic environment through their proposals, creating the potential to not only conserve, but also enhance the heritage environment. The Secretary of State is also directed to treat favourably proposals which preserve and enhance the setting of heritage assets.

5.3.4.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified the potential for the draft NPS-DC to result in neutral effects against this objective. The draft NPS-DC sets out a framework for the identification, assessment and treatment of the heritage environment where a proposal will have direct or indirect effects on assets and their settings. Using a scaled approach that considers the status and significance of the asset, protection and refusal of consent are enabled where they will have substantial harm on significant assets, and broader considerations of the setting of the asset from noise, light and visual appearance address potential cumulative degradation of the historic environment. The draft NPS-DC encourages applicants to consider opportunities to enhance heritage assets and add to



wider public knowledge, allowing for positive impacts to also be realised through data centre development.

The assessment of the relevant policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 10.

Table 10: AoS Objective 4: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
4. Conserve and enhance cultural heritage assets and their settings, and the wider historic environment	Direct	High	Long	National	Permanent/ Irreversible	Neutral

5.3.4.4 Mitigation and enhancement measures

The draft policies achievement of this objective could be enhanced by:

- Specifically directing applicants to record and conserve sites in situ, or record and remove, rather than referring generally to ‘treatment’.

5.3.5 AoS Objective 5: To conserve, protect and enhance landscape and townscape quality and visual amenity

5.3.5.1 Anticipated Effects

National Parks and National Landscapes hold significant historic and cultural value, including listed buildings, archaeological sites, and historic landscapes. Under the UK planning system, nationally designated landscapes such as National Parks and National Landscapes are afforded the highest level of protection. Other valued landscapes may also be identified and safeguarded through local planning policies.

Data centres are substantial pieces of infrastructure that can alter the visual character of rural and protected landscapes, particularly near National Parks or Areas of Outstanding Natural Beauty (AONBs). In addition, data centres require large amounts of energy for their operations and may necessitate additional energy infrastructure to be located in close proximity. This can lead to land-use conflicts in visually sensitive areas.

5.3.5.2 Assessment against the objective

The draft NPS requires proposals within designated landscapes to meet high environmental standards, including the application of appropriate requirements where necessary. The conservation and enhancement of natural beauty should be given substantial weight when considering applications within National Parks, the Broads, and AONBs. However, consent may be granted in exceptional circumstances.



The draft NPS-DC also highlights the duty to further the purposes of nationally designated landscapes, which applies equally when considering projects located outside their boundaries that may have impacts within them. The policy states that the aim should be to avoid harming the purposes of designation or, where this is not possible, to minimise adverse effects. Such projects should be designed sensitively, taking account of siting, operational, and other constraints. The draft NPS-DC notes that the visibility of infrastructure from within a designated area is not, in itself, a reason to refuse consent.

The draft NPS-DC makes reference to the role of good design criteria in mitigating the impact of developments on the landscape. As a result of the (larger) size requirements for data centres, the visual impact on the landscape should be factored into building design.

With regard to design, the Secretary of State should:

- Be satisfied that local authorities have sufficient design content secured, to ensure future consenting meets landscape, visual and good design objectives.
- Judge whether adverse impact would be so damaging that it is not offset by project benefits (including need).
- Consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other constraints, to minimise harm, including by appropriate mitigation.

Applicants are required to consider the likely impact on the town and landscape in their environmental statement as part of the application process. Most development proposals should be subject to EIA which considers the impact of development on landscape.

Applicants are encouraged to consult the local community at an early stage to identify potential impacts of their development on open spaces and other land uses. Feedback from this consultation should be used alongside good design principles to consider how additional community benefits can be provided. These benefits may include the creation of parks, green spaces, or the integration of green and blue infrastructure.

5.3.5.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential minor negative effects against this objective.

The NPS-DC supports the protection of areas designated for landscape value through requiring the conservation and enhancement of the natural beauty of these areas to be given substantial weight during the application process. In exceptional circumstances, development which adversely effects these areas will be permitted.

The NPS-DC requires applicants to implement good design principles into their applications to mitigate the impact of development on landscape and townscape. The requirement of EIA in most cases should provide further mitigation. The draft NPS-DC also encourages engagement with local communities to consider development benefits, which may include open space and parks.

As a result of the size and scale of data centre development, it is unlikely that all negative effects of development will be mitigated. In addition, EIA is not required in all cases, and in exceptional circumstances, development which adversely effects national landscapes, and designated sites may be permitted. Overall, development is likely to result in some negative



impacts on landscape character and visual quality, therefore a potential minor negative effect is recorded.

Table 11: AoS Objective 5: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
5: To conserve, protect and enhance landscape and townscape quality and visual amenity.	Direct	High	Long	National	Permanent/ Irreversible	Minor Negative

5.3.5.4 Mitigation and enhancement measures

Following this review, it was identified that minor adverse effects can be expected, however they are not expected to be significant. There are no recommended mitigation measures or policy improvements identified which would improve this performance.

5.3.6 AoS Objective 6: To protect, enhance and increase resilience of water quantity and quality

5.3.6.1 Anticipated Effects

Climate change is placing increasing pressure on water resources, raising concerns about the UK's ability to meet demand during peak periods, particularly during prolonged droughts. Water supply shortfalls are already occurring in some areas, with housing and business growth affected by limited availability and inadequate water infrastructure. Maintaining sustainable levels of water resources is also essential for the health of species and aquatic ecosystems.

Data centres may rely on water resources to maintain acceptable operating temperatures. Depending on the design of the cooling system (for example, closed-loop or open systems), this can result in high levels of water consumption. Due to the need to keep equipment cool, these periods of high consumption are also likely to occur during peak demand periods, such as summer or during heatwaves when water resources are already under pressure.

5.3.6.2 Assessment against the objective

The draft NPS-DC acknowledges that data centres can be water-intensive operations and that infrastructure construction can result in discharges with adverse effects on the health of water environments.

The draft NPS-DC directs applicants to assess the impacts of development on water resources and quality, as well as on the physical characteristics of the local water environment, with this forming part of the EIA. This measure will help ensure that the local water context is considered by both the applicant and the decision-maker.



The draft NPS-DC also requires that an environmental statement for the development explains how water quality may be affected, the potential impacts on the local water environment, and how these may change in the future due to climate change. This ensures a forward-looking approach to understanding how development may affect water resources, given the potential for availability to decline over time. The draft policy could be strengthened by requiring that, where an applicant's catchment is expected to experience water shortages or stress, the design responds appropriately by integrating best practice for water efficiency. For example, the draft NPS-DC states that impacts on local water resources can be minimised through planning and design for the efficient use of water, including rainwater harvesting and water recycling. The draft NPS-DC states that water based cooling systems should be closed loop to minimise water usage.

The draft NPS-DC references good design principles and the use of appropriate technology as a means to maximise value and minimise water use. Applicants should demonstrate how they have applied good design criteria and technologies to limit water consumption and, where such technologies have not been used, provide reasons for this along with appropriate mitigation measures. The draft NPS-DC also states that a board-level design champion should be appointed.

The draft policy identifies that developments should deliver maximum efficiency of water-intensive functions and identify ways in which development can contribute to achieving BNG beyond the statutory minimum of 10%.

Applicants are encouraged to consider and outline the steps they have taken to reduce water usage with the resource requirements of water directly considered when submitting an application, the applicant is directed to, where possible, demonstrate they have sought to reduce water consumption. These measures will be viewed favourably by the Secretary of State. Where applicants select less resource efficient designs (e.g., less water-efficient technologies) applicants are also directed to set out rationale for the less efficient design being chosen. If a proposal does not select technologies that minimise water usage, the draft NPS-DC requires them to explain the reasons for this, and to offer appropriate mitigation measures or compensation if necessary.

The draft NPS-DC sets out a range of sustainable approaches to managing surface water and drainage. The benefits of these approaches for managing flood risk are highlighted, along with the requirement that peak flows of surface water leaving the site should not exceed pre-development rates.

The benefits of multifunctional design for floodwater management and supporting wildlife habitats are acknowledged, and applicants are encouraged to seek opportunities to use open space for this purpose through sustainable drainage systems. The draft policy also addresses the ongoing maintenance of these systems and identifies the authority responsible for ensuring they remain functional throughout their lifespan.

The draft NPS-DC recognises the Government's vision for cleaner air and water. Applicants are encouraged to implement suitable controls during the construction phase to treat surface runoff and limit discharges of solids into water during site operation (e.g., from car parks). The Secretary of State is directed to consider how the applicant is mitigating the development's impact on water quality and resources, as well as any additional compensation measures offered.



The draft policy notes that development should, wherever possible, help to improve local environmental conditions such as water quality and take into account relevant information, including river basin management plans.

5.3.6.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential **minor negative effects** against this objective. Although there are provisions for reducing data centres consumption of water resources, these could be strengthened through wording adjustments. Furthermore, the draft policy could be enhanced through inclusion of encouraging restoration of degraded water bodies, where they are located on site.

The assessment of the relevant policy has been undertaken considering each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 12.

Table 12: AoS Objective 6: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
6. To protect, enhance and increase resilience of water quantity and quality	Direct	High	Medium/ Long	District-wide	Permanent/ Reversible	Minor Negative

5.3.6.4 Mitigation and enhancement measures

As a minor negative effect against this AoS Objective has been identified, the following mitigation/enhancement measures are recommended:

- Requiring that where the development is located in an area currently or forecast to experience water shortages or stress, that the design must respond by integrating best practice design for water efficiency.
- The draft NPS-DC encourage applicants to restore degraded water bodies where these are present on site, and consider water management strategies or plans, where relevant; and
- That the Secretary of State must be satisfied that any impact on the water environment resulting from the development meets the required environmental standards and legislation.



5.3.7 AoS Objective 7: To minimise emissions of pollutant gases and particulates and protect air quality

5.3.7.1 Anticipated Effects

Poor air quality is the greatest environmental risk to public health in the UK, with risks associated with both short- and long-term exposure. Although air quality in England has improved in recent years, some communities remain vulnerable. Lower-income areas consistently experience higher levels of pollution than more affluent areas. Poor air quality also harms the natural environment, including terrestrial and freshwater ecosystems. The main pollutants of concern include heavy metals, ozone, sulphur dioxide, halogens, and dust and particulates.

The vast majority of data centres in the UK are powered by the national electricity transmission network. Their impact on air quality depends on the electricity generation mix and the proportion of combustion-based sources. Data centres currently consume approximately 2.5% of the UK's total electricity. The increasing demand for artificial intelligence (AI) is likely to drive the need for new data centres in England, which in turn is expected to increase electricity demand. This could lead to higher air pollutant emissions if the additional power demand is met by combustion-based energy generation.

At the local scale, the requirement for back-up generators in data centres can affect air quality. These generators provide an uninterruptible power supply in the event of brownouts or blackouts, where there are fluctuations or loss of power from the national grid. Routine testing and maintenance of back-up generators also have local air quality impacts. Due to the need for on-site fuel supply, back-up generators typically run on diesel, although Hydrotreated Vegetable Oil (HVO) is becoming increasingly common. HVO releases significantly less CO₂ than traditional diesel.

Data centres are experiencing rapid growth in areas in and around London and the South East; however, the UK's second-largest co-location data centre hub is Greater Manchester. Data centres are usually located within or near cities to remain close to their user base. Cities generally have poorer air quality due to the density of pollution sources, including vehicles, industrial facilities, and construction projects. Data centres have the potential to add to these cumulative sources, particularly where diesel generators are installed.

5.3.7.2 Assessment against the objective

Applications are required to undergo an EIA that considers the impacts of development on air quality. Applicants should ensure compliance with the Air Quality Standards Regulations 2010 and the Environment Act 2021, which set thresholds for exceedances and fine particulate matter targets. The Secretary of State must be satisfied that any air emissions resulting from the development meet the required environmental standards and legislation.

Applications must assess their impact on air quality limits, objectives, and targets, and outline mitigation strategies to reduce these impacts. Where a project is considered likely to have adverse effects on air quality, the applicant should provide an assessment that includes an estimation of the relative change in air quality levels resulting from the project, details of mitigation actions, and the expected air quality level once all mitigation measures have been implemented. The draft NPS-DC states that applicants should demonstrate how they will not



exacerbate existing air pollution levels across the site's life phases, (e.g., construction, operation, decommissioning).

Applicants are required to consider the Department for Environment, Food and Rural Affairs (DEFRA) air quality statistics and projections and ensure consistency with these projections. Particular attention should be given to the use of road links for construction and operation near densely populated areas, including locations with concentrations of educational, healthcare, or residential facilities.

If the estimated impact on air quality is substantial, the draft NPS-DC states that the Secretary of State should review the applicant's justification for this impact and may impose conditions for development consent. Substantial weight may be given to air quality as a determining factor where impacts affect sensitive sites close to the development, such as schools, healthcare facilities, and housing.

The draft NPS-DC also requires that future technological developments in data centre construction such as the adoption of renewable energy sources, advanced cooling systems, and reduced reliance on diesel generator back-up are factored into applications. Where relevant, applicants should explain how these measures will reduce air quality impacts and associated noise pollution over the long term.

In addition to consideration of human health, the Secretary of State must consider effects on sensitive habitats or designated sites for nature conservation, and other local wildlife.

5.3.7.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified the potential for the draft NPS-DC to result in minor negative effects against this objective. The assessment of the draft policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 13.

The draft NPS-DC states that it is highly unlikely that a data centre will have no impact on air quality. Applications are subject to an EIA, which considers air quality, and applicants are required to assess how their proposals, including any on-site power generation, testing and emergency use of back-up generators, affect air quality limits and include mitigation strategies to reduce these effects. Where adverse impacts are likely, mitigation measures must be included and must meet the required standards.

Overall, sufficient mitigation is in place to address the most significant air quality impacts; however, it is likely that air quality will still be affected to some extent by the development of data centres. A potential **minor negative effect** has been identified.



Table 13: AoS Objective 7: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
7: To minimise emissions of pollutant gases and particulates and protect air quality	Direct	High	Long	Regional	Permanent/ Reversible	Minor Negative

5.3.7.4 Mitigation and enhancement measures

As a minor negative effect against this AoS Objective has been identified, the following mitigation/enhancement measure is recommended:

- Consider applications favourably where they include the use of back-up energy supplies which use non air polluting (e.g. renewable) technologies such as battery storage.

5.3.8 AoS Objective 8: To conserve and enhance soil health and geology and contribute to the sustainable use of land

5.3.8.1 Anticipated Effects

Over the past 200 years, England's soils have experienced significant degradation as a result of intensive farming, pollution, landfill, and urban development. This has led to the loss of organic matter, erosion, compaction, and increased flood risk, all of which have been exacerbated by climate change. Soils store approximately three times more carbon than the atmosphere; however, UK arable soils have already lost between 40% and 60% of their organic carbon. Each year, an estimated 2.9 million tonnes of topsoil are lost, while rapid urbanisation continues to drive land-use change. Measures should be implemented to avoid land take and the loss of best and most versatile (BMV) land, and to protect soil more generally by preventing impacts such as contamination, loss, mixing, compaction, or sealing.

Because land and soils are finite and declining in extent, their use requires careful consideration, particularly given competing demands for greenfield sites. As with other large-scale developments, data centre projects have the potential to compete with land uses traditionally safeguarded to prevent urban sprawl and preserve natural or agricultural space.

Facilitating data centre growth to meet the needs of the UK economy may result in generic effects on soil and geology similar to those associated with other land-intensive urban uses, these include:

- Disturbance or loss of soils, including those classified as best and most versatile agricultural land, or geologically important sites (such as Sites of Special Scientific Interest).



- Risk of pollution and contamination of soils, particularly during the construction phase; and
- Competition with other land-intensive objectives, such as increased housing provision, agricultural land, and the expansion of natural habitats for biodiversity and climate change mitigation.

5.3.8.2 Assessment against the objective

The draft NPS-DC requires applicants, during pre-application discussions with local planning authorities, to identify any concerns regarding the impacts of the proposed development on land use. This includes, where relevant, any independent assessment by the applicant confirming that the selected site is surplus to requirements. This process enables the local planning authority to raise concerns about competing demands for land in the area, such as housing, agriculture, or ecosystem restoration.

The draft NPS-DC also directs that developments should contribute to and enhance the local environment and prevent new or existing developments from being put at risk or adversely affected by unacceptable levels of soil, air, water, or noise pollution, or by instability.

The reuse of previously developed land can make a significant contribution to sustainable development by reducing the need to use countryside and undeveloped greenfield land. However, it is acknowledged that this may not be suitable for certain forms of infrastructure. The draft NPS-DC acknowledges the role of greenfield land, and the Green Belt specifically, as a barrier to urban sprawl, and its fundamental purpose of keeping land open around urban areas.

Applicants are required to engage with local planning authorities and communities at an early stage to understand the potential impact of development on existing open space and land uses. Feedback from this engagement should inform the design of the proposal. Applicants are also encouraged to consider how their development could provide additional benefits for the local community, such as public spaces for recreation or green and open areas. These benefits may include the integration of green and blue infrastructure, helping to align data centre development with local strategic land use planning and delivering wider benefits through the creation or enhancement of community open space assets.

The draft NPS-DC explicitly states that the presumption of consent does not apply to sites within the Green Belt. Data centres should only be developed on Green Belt land in exceptional circumstances. Where a proposal includes part or all of a development within the Green Belt, the applicant must provide clear reasoning as to why alternative sites are not suitable. This maintains strong protections for Green Belt land and supports the principle of directing data centres towards previously developed land.

Where existing developed sites within the Green Belt may be suitable and recognising that data centres often benefit from proximity to urban areas, the draft NPS-DC advises that applicants should consider whether such sites can be developed without causing additional adverse impacts on the environment or the existing landscape.

Where land is being considered for a development and land contamination is already present the draft NPS-DC notes that the objective shall focus on making the site suitable for its intended land use, and that consideration of contaminated land should be aligned with statutory minimums. Applicants that are seeking to use previously developed land are



directed to consider the risk posed by land contamination and how they propose to address this.

Depending on the level of contamination present, development may have a positive effect by rehabilitating land and bringing it into productive use where it would otherwise have been unsuitable for more sensitive purposes.

Applicants are required to consider the suitability of land for its intended use, including any risks arising from contamination. They are also encouraged to identify opportunities for remediation where possible. The draft policy could be enhanced by making it easier for them to locate on contaminated land than other land, as a way to incentivise applicants to do this.

The draft NPS-DC encourages applicants to develop and implement a Soil Management Plan (SMP) to minimise potential land contamination and ensure that the reuse of soils is undertaken with careful consideration and in accordance with good practice, particularly where large quantities of soil are surplus to requirements or affected by contamination.

Applicants should safeguard mineral resources on proposed sites as far as possible, taking into account the long-term use of the land following future decommissioning. In addition, the draft NPS-DC requires that, in areas identified for mineral safeguarding, the Secretary of State ensures appropriate mitigation measures are implemented to protect these resources. Given the anticipated constraints on mineral availability in the future and their importance to economic growth, such resources must be protected. The draft policy could be enhanced by setting out which geological resources are classified as high value and include specific reference to SSSI.

Applicants should seek to minimise impacts on the best and most versatile (BMV) agricultural land and give preference to land of poorer quality (Grades 3b, 4, and 5). The draft NPS-DC states that the Secretary of State should ensure that applicants do not site their schemes on BMV land without clear justification. The draft policy wording should be enhanced by replacing 'should' with 'shall' to provide greater certainty.

Where schemes are proposed on BMV land, the draft NPS-DC directs the Secretary of State to consider the economic and other benefits of that land. This requirement should be strengthened so that the Secretary of State also considers the implications of introducing the development and the resulting loss of the BMV site on the viability of wider agricultural production.

5.3.8.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential **minor adverse effect** against this objective. The assessment of the relevant policy has been undertaken considering each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 14.



Table 14: AoS Objective 8: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
8: To conserve and enhance soil health and geology and contribute to the sustainable use of land	Direct	Medium	Long	Localised	Permanent/ Irreversible	Minor Negative

5.3.8.4 Mitigation and enhancement measures

As a minor negative effect has been identified, the following mitigation/enhancement measures are recommended:

- The draft NPS-DC states that the Secretary of State ‘should’ ensure that applicants do not site their schemes on the best and most versatile agricultural land without justification. This wording should be enhanced from ‘should’ to ‘shall’ to provide certainty any use of BMV is justified.
- For schemes on BMV land, the requirement should be enhanced so that the Secretary of State specifically considers resulting loss of the BMV site on the viability of wider agricultural production.
- The draft policy could be enhanced by making it easier for applicants to locate on contaminated land, as a way to incentivise applicants to locate on these sites; and
- Set out which geological resources are classified as high value and include reference to SSSI specifically.

5.3.9 AoS Objective 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities

5.3.9.1 Anticipated Effects

Data centres are large-scale infrastructure facilities. The construction and operation of these facilities can cause disturbance to local communities, which may affect health and wellbeing.

Noise pollution can occur during both the construction and operational phases. Activities such as piling, excavation, and heavy goods vehicle (HGV) traffic can cause short-term disturbance, while vibration impacts are generally limited to construction and are rarely significant during operation. There is, however, a potential risk of long-term noise pollution from the continuous use of chillers, Heating, Ventilation and Air Conditioning (HVAC) systems, fans, and standby generators. Prolonged exposure to noise can negatively affect



health outcomes for site personnel and surrounding communities, and in some cases may increase susceptibility to mental health conditions such as depression.

Access to green spaces and recreational outdoor environments, including trails and public footpaths, is important for health and wellbeing. Changes in land use resulting from data centre development may negatively impact community wellbeing. However, there are opportunities to enhance access to open space and recreation through careful planning and design.

5.3.9.2 Assessment against the objective

A noise assessment covering both construction and operational phases is required, and due regard must be given to the NPPF and any associated Government planning guidance on noise.

Applications must demonstrate how relevant mitigation measures will be assessed and enforced. Best practice measures and performance targets for noise during the development and operational phases of the data centre should be implemented, with targets developed in consultation with local communities and stakeholders. Applicants should also demonstrate that reasonable steps have been taken to minimise the negative impacts of dust, odour, artificial light, smoke, and steam emissions.

The draft NPS-DC requires that the balance between noise emissions and societal benefits be considered. Where an application demonstrates that mitigation has been addressed and effective measures implemented, development consent may be granted.

Development consent should not be granted where it would result in the loss of open space or sports and recreation facilities, unless it can be proven that the land is surplus to requirements.

Applicants should consult local communities early in the process to determine the potential impact of development on existing open space, sports or recreational buildings, and other land uses. Feedback from this consultation should inform the design of the proposal. Applicants are encouraged to consider how their developments can provide additional benefits to the local community, such as parks, green spaces, sports or recreation facilities, or the integration of green and blue infrastructure.

Applicants should consult with the Health and Safety Executive prior to submitting an application. The EIA Regulations require consideration of the implications of major accidents or disasters. Applicants must explain the health and safety issues specific to developing a data centre, alongside general workplace health and safety risks, and outline the mitigation measures to be implemented to minimise these risks.

Where additional transport infrastructure is required, it should incorporate high-quality walking, wheeling, and cycling routes. Applications are expected to include appropriate mitigation measures to address adverse effects on coastal access, National Trails, other rights of way, and areas of open access land. The draft NPS-DC directs that greater consideration is given to applications which clearly demonstrate how they have implemented strategies to benefit local communities from their development, for example through creating access paths.



5.3.9.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified the potential for the draft NPS-DC to result in a minor negative effect against this objective. The assessment of the relevant policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 15.

Overall, development is likely to cause some negative impacts on communities through disturbance. The draft NPS-DC focuses on mitigating the impact of development on noise pollution and implementing measures that should reduce the likelihood of major health and safety incidents. Development should not result in the loss of existing open space.

The draft NPS-DC provides less certainty regarding the enhancement of social infrastructure, including recreation facilities and access to nature. The wording currently asks applicants to consider enhancement measures “where appropriate.” While the NPS-DC should sufficiently mitigate negative impacts on communities, it is unlikely to deliver significant improvements to community health and wellbeing.

The draft NPS-DC does not require the creation of new open space for recreation, therefore it is not likely that any positive effects from development on communities will occur.

Table 15: AoS Objective 9: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities	Direct	Medium	Long	Localised	Permanent/ Reversible	Minor Negative

5.3.9.4 Mitigation and enhancement measures

As a minor negative effect has been identified, the following mitigation/enhancement measure is recommended:

- Where direct enhancement opportunities are not practicable, applicants are encouraged to support local authorities plans to enhance open space and recreation facilities, particularly in areas which are deficient of these facilities.

5.3.10 AoS Objective 10: To promote a strong, diverse, and stable economy

5.3.10.1 Anticipated Effects

Businesses and citizens rely heavily on the services provided by data centres. With the majority of information now held online and the anticipated growth in artificial intelligence (AI), data centres are critical to supporting businesses, public services, communications, and AI growth zones. The UK Government estimates that £45 billion of private investment has been committed to the sector since July 2024, with projections suggesting that nearly



100 new data centres could be built within the next five years, creating jobs associated with their delivery and operation. Investments are expected to span data centre infrastructure, IT equipment such as servers, storage and network systems, and power generation and transmission.

UK GDP growth has been slow and has fluctuated following a challenging period during the COVID-19 pandemic and Brexit, when GDP growth declined significantly. The largest contributions to GDP have come from the services and construction sectors. Economic output, measured by GDP growth, remains unevenly distributed, with London accounting for the largest share at 22.3% of the UK's GDP in 2023, well above other regions. Although data centres do not directly employ large numbers of people, they support employment during the design and construction phases and underpin the wider modern economy. Data centres also provide computing and storage capacity that enables businesses to deliver digital products and services, thereby supporting broader economic productivity.

5.3.10.2 Assessment against the objective

The updated draft NPS-DC clearly recognises the need to support the digital economy and the importance of data infrastructure in driving growth and delivering public services across the UK. The draft NPS-DC will enable a streamlined consenting process, allowing decisions to be made in the national interest and facilitating the rapid delivery and scaling of data centres.

The importance of securing digital services against malicious actors is explicitly acknowledged.

The integration of data centres with the energy system is an important factor influencing energy prices, which have an impact on the wider economy for industry and consumers. The importance of integrating data centres with the national grid is explicitly recognised, and the delays in receiving a connection to the grid are acknowledged as a potential barrier to the effective deployment of data centres. Applicants are required to engage with the national grid before submitting an application. Although a confirmed grid connection is not a prerequisite, applications submitted without one are made at the applicant's own risk.

Consideration of how the proposal integrates with other land uses forms part of the assessment, particularly the benefits of improved efficiency and reduced demand on the grid. Given data centres significant requirement for a stable and continuous energy supply Integration with the energy system is critical for data centres.

Data centres are substantial energy consumers. The rapid rollout of data centres has the potential to increase overall energy demand and place upward pressure on energy prices. Energy affordability is essential for economic growth and for meeting the needs of consumers, including vulnerable users who are particularly sensitive to price fluctuations.

The draft NPS-DC refers to the benefits of data centres that place lower demands on the national grid, and that applicants who can demonstrate reduced demand on the national grid through renewables or low carbon sources will be preferred by the Secretary of State when making development consent decisions. This is particularly relevant in the context of electrification as a key driver for achieving the UK's net zero goals, as well as the wider economic implications of energy pricing. These factors also present the potential for cumulative effects.



The Secretary of State when making decisions on applications for development consent, may also consider other types of data infrastructure not included in this draft NPS-DC. Where applications cover issues beyond solely data infrastructure for example energy generation infrastructure it is recognised other NPS-DC may be of consideration, in particular transport and water.

The examining authority must take into account the potential benefits of data centre development, including economic growth and improvements to the local environment and society. Data centre projects may also attract wider investment in supporting or complementary infrastructure, which can further stimulate economic development. Establishing robust data centre ecosystems is likely to make the UK more attractive to technology companies and multinational organisations seeking to expand.

The draft NPS-DC also notes that public services such as healthcare, education, and infrastructure, which rely on efficient data hosting, would benefit from increased data centre capacity to support essential services.

The draft NPS-DC ensures that consideration of wider infrastructure can be incorporated as part of a data centre application. Applicants are instructed to consult with the local community at an early stage to identify potential impacts on public facilities and to consider how developments can provide additional benefits for the community, such as parks, green spaces, sports and recreation facilities and providing homes and businesses with heat reused from data centres. These measures can deliver wider economic benefits by investing in long-term public assets.

Where applicants believe that development may have socio-economic impacts, an assessment must be included as part of the environmental statement. This assessment should cover impacts such as job creation, training opportunities, and any other benefits for local businesses. The Secretary of State is directed to consider the positive socio-economic impacts across the lifespan of the construction and operation of the data centre. The Secretary of State is also able to include a requirement that specifies the approval by the local authority of an employment and skills plan.

The benefits of clustering data centres and networks are explicitly recognised in the draft NPS-DC. Applicants proposing developments as part of AI Growth Zones or clusters may be exempted from compulsory EIAs.

5.3.10.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified the potential for the draft NPS-DC to result in significant positive effects against this objective. The assessment of the relevant policy has been undertaken with reference to each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 16.



Table 16: AoS Objective 10: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
10: To promote a strong, diverse, and stable economy	Direct	High	Medium	National	Temporary/ Irreversible	Significant Positive

5.3.10.4 Mitigation and enhancement measures

The draft policy is found to have a significant positive effect and therefore no measures have been recommended to enhance the draft NPS-DC's achievement of this objective.

5.3.11 AoS Objective 11: Support local economies and promote opportunities to improve education and skills, and employment

5.3.11.1 Anticipated effects

Data centres may be located in areas close to communities and users, often on the fringes of urban areas. While they provide broad benefits to the national economy through the services they support, it is important to consider their direct impacts on localities to ensure that effects are not unequally distributed.

Outside urban areas and in more rural districts, data centre development presents opportunities to offer employment and training to local communities, as well as to invest in these communities by supporting improved digital access.

5.3.11.2 Assessment against the objective

When considering any proposed data centre development, the Examining Authority and the Secretary of State will take into account any potential further benefits, such as the economic development of the region, improvements to the supply chain and other secondary benefits.

Applicants who believe that the development may have socio-economic impacts must include an assessment of these impacts as part of the environmental statement. This assessment may cover, for example, job creation and training opportunities relevant to the development.

While not explicitly stated, it is anticipated that the delivery of data centres will create jobs directly during construction and indirectly through the wider economic productivity they support. However, where there is a shortage of construction talent, this may have a cumulative short-term negative impact. The draft NPS-DC notes the potential for contributing to a shortage of construction workers for other industry needs and major projects in the region if several projects proceed simultaneously.



Training opportunities and the provision of skilled jobs in local areas can also be expected to support investment by other businesses in those areas. The Secretary of State may include requirements for approval by the local authority of an employment and skills plan, detailing measures to promote local employment and skills development, such as apprenticeships.

The delivery of data centres will require skilled personnel in engineering and construction during the development phases and will support direct employment at the centres during their operational life. The draft NPS-DC also directs the Secretary of State, when considering the socio-economic effects of an application, to include an employment and skills plan (see above). This may include opportunities such as apprenticeships, engagement with local schools and colleges, or the implementation of training programmes.

The draft NPS-DC is site-agnostic and does not specify where data centres may be located. Although some data processing functions operate more effectively when located close to end users, this is not explicitly addressed in the draft policy.

5.3.11.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential **minor positive effects** against this objective. The assessment of the relevant policy has been undertaken considering each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 17.

Table 17: AoS Objective 11: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
11: Support local economies and promote opportunities to improve education and skills, and employment	Indirect	Medium	Short/ Medium	Regional	Temporary / Irreversible	Minor Positive

5.3.11.4 Mitigation and enhancement measures

As a minor positive effect against this AoS Objective has been identified, mitigation measures are not required.

5.3.12 AoS Objective 12: Promote the national security of the UK

5.3.12.1 Anticipated effects

The draft NPS-DC can support the UK's security objectives by providing greater consistency and checks for the design and operation of data centres, enabling them to better withstand cyber security and physical security threats. In the UK, the Cyber Security Breaches Survey 2025 identified that over four in ten businesses (43%) experienced a cyber security breach or attack in the past 12 months, representing a decrease from 2024, when 50% of



businesses reported such incidents. However, the prevalence of breaches among medium and large businesses remained high at 67% and 74%, respectively, similar to rates in 2024.

Critical infrastructure can also be targeted by physical threats as well as cybercrime, including acts of sabotage, damage, or theft. Conversely, data centres have the potential to conflict with the UK's energy independence goals by increasing pressure on the energy system. Data centres are powered by electricity from the grid and rely on backup generators, which may include natural gas, diesel, hydrotreated vegetable oil (HVO) fuel, or battery energy storage systems (BESS). To achieve the UK Government's ambition under the Clean Power 2030 Action Plan, total operational capacity of renewables will need to more than double by 2030. Energy security is a matter of national security; therefore, the energy requirements of data centres must be considered strategically.

Similarly, critical minerals required for servers and other equipment used in data centres often form part of global supply chains. These minerals are essential to UK security to ensure that critical functions can continue to operate.

5.3.12.2 Assessment against the objective

The co-location of data centres with energy infrastructure (EN-1 to EN-6) is identified in the draft NPS-DC as a likely scenario. Applicants are encouraged to utilise renewable energy generation and to utilise renewable and low carbon sources of energy. This supports the ambition of moving the UK towards national energy independence and reducing reliance on imported fossil fuels such as gas or diesel. Renewable energy sources, including wind and solar, provide independence of supply; however, they may not be suitable as the sole source of energy for data centres, as these sources can be intermittent and data centres require a continuous energy supply.

Diesel generators are commonly used and referenced in the draft NPS-DC as a back-up power source, with larger-scale data centres potentially requiring upwards of twenty generators. The draft NPS-DC does not address this in relation to the security and reliability of supply. However, the draft NPS-DC acknowledges that secure grid connections and energy independence uphold the principle of national security and consistent secure data supply.

National security considerations apply across all national infrastructure sectors and are recognised as critical for data centres, which may be targeted by malicious actors given their role in hosting and supporting essential services. Threats may be physical or cyber-related. BIST as the sector sponsor, notes that it will work closely with relevant authorities such as the National Cyber Security Centre (NCSC), the National Protective Security Authority (draft NPSA), and law enforcement to manage threats and mitigate risks.

Applicants are directed to consult with relevant security experts and law enforcement, where appropriate, to ensure that security risks are adequately addressed through the design and operation of facilities. Security authorities may provide confirmation to the Secretary of State that they are satisfied the identified security issues have been addressed and/or mitigated.

The draft NPS-DC references the importance of good design for data centre infrastructure and states that this should be considered from the outset. It acknowledges that data centres are resource-intensive by nature and therefore their design must incorporate measures to mitigate and reduce harmful impacts. This includes the use of appropriate technologies.



There is no reference to critical components used in the design or within the supply chain within the draft NPS-DC. However, where sites hold mineral resources, applicants are directed to safeguard these as far as possible, and under Objective 13, proposals are directed to consider the reuse and recycling of materials in the design and operation of the facility.

5.3.12.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential **minor positive effects** against this objective. The draft policy has suitable provisions to provide for more secure data centres, however there is less consideration for security beyond the site itself, including the components that form the facility through critical materials or the sites potential reliance on imported energies which may impact the energy reliance of operations. In balance, this results in a neutral impact on the objective.

The assessment of the relevant policy has been undertaken considering each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 18.

Table 18: AoS Objective 12: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
12: Promote the national security of the UK	Direct	High	Medium	National	Temporary/ Reversible	Minor Positive

5.3.12.4 Mitigation and enhancement measures

As a minor positive effect against this AoS Objective has been identified, mitigation measures are not required.

5.3.13 AoS Objective 13: Promote sustainable waste management and resource use

5.3.13.1 Anticipated effects

Data centres typically have a design life of between 10 and 15 years. Once this technology reaches the end of its lifecycle, or new software or system updates are introduced, the equipment is disposed of. Historically, data centres have not applied circular economy principles, largely because equipment is difficult to reuse or recycle due to its composition of mixed material types.



The current model of waste management in data centres results in the loss of valuable and finite materials, including critical minerals, and poses risks to the environment, ecosystems, and human health. Addressing this issue requires a transition towards circular design, improved reuse, and scalable recycling solutions within the sector.

In addition, in 2022, England generated 63 million tonnes of non-hazardous construction and demolition waste, with 59.4 million of this recovered²⁵ (recovery is measured as generation minus landfill). Data centre construction has potential to both consume resources through construction and contribute to construction and demolition waste generated.

5.3.13.2 Assessment against the objective

The draft NPS-DC recognises that construction and operation stages of data centres have potential to generate hazardous and non-hazardous waste, as well as consuming finite resources. The draft NPS-DC sets out expectations for both sourcing of materials and for treatment of waste, emphasising a more circular approach to resource management.

When assessing a proposal, applicants are directed to set out their arrangements for managing any waste produced and explain how waste will be prevented, and how re-use or recycling will be maximised.

In addition, applicants are encouraged to reduce the consumption of virgin materials, by sourcing materials which are recycled or reused, and using low carbon, sustainable sources and local suppliers. This will support the minimisation of material consumption during the construction phase. The draft NPS-DC also directs that best practice construction practices should be used to ensure materials are reused or recycled onsite where possible, helping to reduce production of construction and demolition waste.

The draft NPS-DC suggests that, where possible, developments should feed heat as a by-product through the heat network to meet local heat demand, instead of disposing of excess heat.

The wording of the draft NPS-DC leaves the assessment phrasing open, with the term 'should' leaving potential for proposals to not adequately apply the waste framework.

The draft NPS-DC states that the Secretary of State should consider the extent to which the applicant has proposed an effective system for managing hazardous and non-hazardous waste, how waste onsite and offsite is managed, steps to minimise the volume of waste and application of circular economy principles. However, the current draft NPS-DC wording using the term 'should' creates potential for inconsistent application by the Secretary of State.

The draft NPS-DC ties the impacts to wider strategic goals, by directing the Secretary of State to have regard to potential impacts on waste reduction targets under the Environment Act 2021 and the Government Environment Improvement Plan.

5.3.13.3 Assessment conclusions and summary

The assessment against the AoS Framework has identified there is potential for the draft NPS-DC to result in potential **uncertain effects** against this objective. The assessment of

²⁵ <https://www.gov.uk/government/statistics/uk-waste-data/uk-statistics-on-waste>



the relevant policy has been undertaken considering each of the guide questions associated with the AoS Objective. A summary of the assessment is shown in Table 19.

Table 19: AoS Objective 13: Assessment Summary

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence / Reversibility	Significance
13. Promote sustainable waste management and resource use	Direct	High	Long	National	Permanent/ Irreversible	Uncertain

5.3.13.4 Mitigation and enhancement measures

As an uncertain effect has been identified, the following mitigation/enhancement measure is recommended:

- That the draft NPS-DC provide greater confidence that the waste provisions will be applied by applicants and the Secretary of State through stronger phrasing. This could be achieved by changing the terms 'should' for both the assessment and the decision making directive to 'shall' or 'will' to give confidence that the objective will be consistently addressed.

5.4 Summary assessment of the Draft NPS-DC against the AoS Objectives

Table 20 summarises the findings of the assessment of the draft NPS-DC against the AoS Objectives.

Table 20: Assessment of the Draft NPS-DC summary against the AoS objectives

AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
AoS 1	Indirect	High	Long	National	Permanent / Irreversible	?
AoS 2	Direct	High	Long	Localised	Permanent / Reversible	+
AoS 3	Direct	High	Long	Localised	Permanent / Irreversible	?
AoS 4	Direct	High	Long	National	Permanent/ Irreversible	0
AoS 5	Direct	High	Long	National	Permanent/ Irreversible	-
AoS 6	Direct	High	Medium/ Long	District-wide	Permanent/ Reversible	-
AoS 7	Direct	High	Long	Regional	Permanent/ Reversible	-



AoS Objective	Direct/ Indirect	Magnitude	Duration	Spatial Extent	Permanence/ Reversibility	Significance
AoS 8	Direct	Medium	Long	Localised	Permanent/ Irreversible	-
AoS 9	Direct	Medium	Long	Localised	Permanent/ Reversible	-
AoS 10	Direct	High	Medium	National	Temporary/ Irreversible	++
AoS 11	Indirect	Medium	Short / Medium	Regional	Temporary / Irreversible	+
AoS 12	Direct	High	Medium	National	Temporary/ Reversible	+
AoS 13	Direct	High	Long	National	Permanent/ Irreversible	?



6.0 Assessment of reasonable alternatives to draft NPS-DC

6.1 Introduction

Under the Environmental Assessment of Plans and Programmes Regulations 2004 (“SEA Regulations”), an environmental report on a proposed plan or programme must identify, describe, and evaluate the likely significant effects of implementing reasonable alternatives, as well as the effects of the plan or programme itself, see excerpt:

SEA Regulation 12: Preparation of environmental report

(2) The report shall identify, describe and evaluate the likely significant effects on the environment of—

(b)reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.

(3) The report shall include such of the information referred to in Schedule 2 to these Regulations as may reasonably be required, taking account of—

(a)current knowledge and methods of assessment;

(b)the contents and level of detail in the plan or programme;

(c)the stage of the plan or programme in the decision-making process; and

(d)the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.

In line with good policy-making principles and SEA requirements, reasonable alternatives for achieving the aims of NPS-DC must be assessed as part of the statutory AoS process. The evaluation of reasonable alternatives provides a strategic basis for assessing the likely significant sustainability effects of draft NPS-DC and enables comparison with alternative approaches to achieving the same objectives.

6.2 Reasonable alternatives for draft NPS-DC

In the absence of a National Policy Statement, the reasonable alternatives considered were Do Nothing, retaining a ‘business as usual’ approach, and utilising National Development Management Plans (NDMPs). The reasonable alternatives in **Error! Reference source not found.** were identified by the BIST Data Centre Growth Policy team for a comparative AoS assessment to be undertaken with the preferred approach (the draft NPS-DC) against the AoS Objectives:

Table 21: Reasonable alternatives to the NPS-DC

Plan/alternative	Overview
Option 1: Do nothing	Without a NPS-DC, developers of data centres could use NSIP under Section 35 of the Planning Act 2008 (the exact wording is ‘The Secretary of State may give a direction for development to be treated as development for which development consent is required’), for a data centre to be approved as a type of ‘business or commercial’ project under existing categories for storage.



Plan/alternative	Overview
Option 2: Use of National Development Management Policies	National Development Management Policies (NDMPs) will be Government policies which decide how land is used in England. They will be able to overrule local plans and the decisions of local authorities in deciding how land is used and allow for a more top-down approach. As NDMPs are not yet in force, this is a theoretical alternative.

Under the alternative options, applicants of NSIPs would need to apply to the Secretary of State to use the Development Consent Order (DCO) process. As NDMPs apply to the Town and Country Planning Act and infrastructure which does not qualify as a NSIP, the DCO process for NSIPs would be consistent across the options. Under Option 2, therefore, an NDMP is assumed to introduce greater consistency for data centres which do not qualify as NSIPs, with data centres which are significant using the DCO process.

Given high level nature of the alternatives and limited information on NDMPs, to draw focus to the differences between the options, a comparative approach has been used in the assessment of alternatives, to understand how they would perform against the AoS Objectives relative to the performance of the draft NPS-DC.

Alongside these reasonable alternatives, in order for data centres to use the powers under section 35 of the Planning Act 2008 and classify data centres as NSIP, a threshold for national significance must be set. The Secretary of State may also refer applications to the Independent Planning Commission if they consider the project to be nationally significant, but it falls below the threshold. A range of thresholds have been considered; these are discussed in Section 6.5.

6.3 Results of assessment of strategic alternatives to NPS-DC

The findings of the appraisal of the strategic alternatives are set out below. The assessment was undertaken in comparison to the NPS-DC, and the findings of the AoS broadly apply to the alternatives with the key differentiator being the level of certainty and control apply to be applied through the alternative to control or influence the outcome. To identify and compare the alternative and NPS-DC on a broad level, the following scale has been used:

Table 22: Assessment of alternatives scale

Scale	Description
Materially more positive than the NPS-DC	A materially more positive outcome is anticipated compared to NPS-DC.
More positive than the NPS-DC	A more positive outcome is anticipated compared to NPS-DC.
Comparable to the NPS-DC	This alternative is anticipated to have the same outcome to NPS-DC.
More negative than the NPS-DC	A more negative outcome is anticipated compared to NPS-DC.
Materially more negative than the NPS-DC	A materially more negative outcome is anticipated compared to NPS-DC.



Scale	Description
Uncertain	The outcome is uncertain.

6.4 Assessment results

Table 23 shows the overall outcomes of the assessment of alternatives against the preferred option. Due to the alternatives being high level, and all options being site agnostic, where an alternative is anticipated to have the same or similar outcomes, the assessment text has not been repeated. The NPS-DC option assessment outcomes are shown alongside the alternatives assessed against it.

Table 23: Summary of alternatives performance against the NPS-DC

AoS Objectives	NPS-DC assessment against objectives	Comparative Performance against NPS-DC	
		Alternative 1: Do Nothing	Alternative 2: National Development Management Plans
AoS 1	Minor negative	More negative	Comparable
AoS 2	Minor Positive	Materially more negative	Comparable
AoS 3	Minor negative	More negative	Comparable
AoS 4	Neutral	More positive	Uncertain
AoS 5	Minor negative	Comparable	Uncertain
AoS 6	Minor negative	Materially more negative	Uncertain
AoS 7	Minor negative	Comparable	Comparable
AoS 8	Minor negative	Materially more negative	Uncertain
AoS 9	Minor negative	More negative	Uncertain
AoS 10	Significant positive	More negative	Comparable
AoS 11	Minor positive	More negative	Uncertain
AoS 12	Minor positive	Materially more negative	Uncertain
AoS 13	Uncertain	Comparable	Uncertain

Alternative 1 performed comparatively more positively against AoS Objective 4 than the draft NPS-DC. This is due to an assumption of slower level of change to heritage features without the NPS-DC.



6.4.1 AoS Objective 1: To minimise greenhouse gas emissions and support the transition to a net zero economy

Alternative 1: Do Nothing

Alternative 1 Do Nothing has the potential to emit higher levels of CO₂ emissions directly from independent fossil fuel generators on site, or through the high energy consumption required by data centres developments when compared with the alternative option of developing an NPS-DC. Under a Do Nothing alternative, the levels of greenhouse gas emissions are highly uncertain, and would depend on the energy efficiency of the infrastructure being developed and whether or not the energy sources used are renewables and low carbon, or fossil based. The performance of the option is overall **more negative** in comparison with the draft NPS-DC when considered against this AoS objective.

Alternative 2: National Development Management Plans

NDMPs may introduce greater direction to enable non NSIP data centres, which may allow for faster processing and construction. Given greenhouse gas targets are set at the national level however, NDMPs may provide for stronger design efficiency requirements, performing better than a Do Nothing alternative but would be expected to have similar benefits to an NPS-DC. The rigour of these protections is uncertain; therefore the performance of this alternative is overall **comparable** with the draft NPS-DC as considered against this AoS objective.

6.4.2 AoS Objective 2: To maximise adaptation and resilience to climate change

Alternative 1: Do Nothing

Alternative 1 could potentially have a **materially more negative** impact than the NPS-DC when considering the resilience of data centres to the expected changes brought by climate change. This is due to there being less policy direction to enforce resilient design and set out what must be considered by developers. Under this alternative it is uncertain to what extent developers would be willing to design infrastructure to be resilient to risks such as flooding or temperature rise, or what measures would be taken to achieve this. Therefore, given the NPS-DC sets out clear expectations for climate adaptation. It is anticipated that this alternative would not perform as positively as the NPS-DC for this AoS objective.

Alternative 2: National Development Management Plans

Adaptation to climate change may be strengthened if a NDMP was introduced requiring data centres to be designed to adapt to predicted climate hazards. For example, if the alternative introduced greater national direction that data centres must be designed to be resilient to predicted flooding or extremes of temperature. This could be an improvement on the Do Nothing alternative, but the NPS-DC provides policy direction on climate change and therefore Alternative 2 is assessed as **comparable** with the draft NPS-DC.



6.4.3 AoS Objective 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality

Alternative 1: Do Nothing

Alternative 1 is expected to result in **more negative** effects on the natural environment biodiversity and ecosystems than NPS-DC. The alternative is likely to result in data centres continuing to be developed, with potential for negative impacts on greenfield sites and natural environments as a result. The impacts of this would be subject to local environmental baseline conditions and it is therefore difficult to confirm the extent and nature of impacts at this strategic level. There is potential for the NPS-DC to allow a greater number of applications to come forward which may have a more significant impact on the environment but the NPS-DC also includes controls and requirement for assessment that would reduce the negative effects and requires mitigation and compensation, including BNG.

Alternative 2: National Development Management Plans

NDMPs may introduce protections for biodiversity which local authorities need to enact. However, as this would not apply to data centre proposals using the NSIP process there is likely to be gaps in coverage, which may result in negative effects that are inadequately addressed. Under this alternative, all data centre proposals would require HRA screening and further stages of HRA, including Stages 3, if necessary. The performance of the alternative overall is considered to be **comparable** with the draft NPS-DC as considered against this AoS objective.

6.4.4 AoS Objective 4: Conserve and enhance cultural heritage assets and their settings, and the wider historic environment

Alternative 1: Do Nothing

Alternative 1 may have a **more positive impact** than the NPS-DC against this AoS objective, because under Alternative 1, Do Nothing, the delivery of data centre developments would be less rapid, and the impacts on the heritage environment are likely to be slower, following a reduced pace of environmental change.

Alternative 2: National Development Management Plans

NDMPs may introduce greater protections for heritage environment which would set more consistent guidance for data centres. However, the nature and details of this are uncertain. As data centre proposals that are not using the NSIP process are likely to be affected it may result in greater protections for the heritage environment, although the threshold to which this applies and the size of these is uncertain. Considering the presence of protections against the NPS-DC's provisions for the heritage environment, this could potentially be a similar outcome, however at this stage this is **uncertain**.

6.4.5 AoS Objective 5: To conserve, protect and enhance landscape and townscape quality and visual amenity.

Alternative 1: Do Nothing

Alternative 1 may result in more negative impacts on landscape and townscape quality and visual amenity, as there is less certainty of the standards which applications would be subject to. In the absence of the NPS-DC, data centre proposals will be subject to local



planning policies and therefore there will be less consistency in how they are considered. The performance of the NPS-DC will not be materially better than this alternative and the performance of this alternative against this AoS objective is therefore considered to be **comparable** with the draft NPS-DC.

Alternative 2: National Development Management Plans

NDMPs may introduce strong protections for landscape and townscape quality, however as data centre proposals expected to come under NDMPs are expected to be of a smaller scale as they do not qualify as NSIPs, this may leave larger data centre proposals without policy guidance and result in greater adverse effects overall. However, given the thresholds for qualification as a NSIP is uncertain and the location of data centre development is unknown at this stage, the assessment has recorded **uncertainty** against this AoS objective.

6.4.6 AoS Objective 6: To protect, enhance and increase resilience of water quantity and quality

Alternative 1: Do Nothing

Data centres have the potential to be significant consumers of water, depending on the design and methods used for temperature control within the facility. In the absence of consistent policy to direct the design and encourage design efficiency there is increased potential for water consumption to be high. Alternative 1 is therefore expected to have a **materially more negative** effect on water quantity. Effects on water quality are not expected to be significantly different and would be expected to be controlled through discharge permits.

Alternative 2: National Development Management Plans

The introduction of a NDMP may put in place stronger protections or direction for water management for the development of data centres than are present within local plan policies, which is therefore a potential improvement on a Do Nothing alternative. However, this would only apply to data centres which do not go through the DCO process, and it is uncertain how the larger data centres will be treated for this AoS objective. The relative performance of this alternative compared with the draft NPS-DC is therefore **uncertain**.

6.4.7 AoS Objective 7: To minimise emissions of pollutant gases and particulates and protect air quality

Alternative 1: Do Nothing

The performance of Alternative 1 is expected to be **comparable** with the NPS-DC for this AoS Objective, given existing controls on air pollution discharges are at the national level.

Alternative 2: National Development Management Plans

The performance of Alternative 2 is expected to be **comparable** with the NPS-DC for this AoS Objective, given existing controls on air pollution discharges are at the national level.

6.4.8 AoS Objective 8: To conserve and enhance soil health and geology and contribute to the sustainable use of land

Alternative 1: Do Nothing

Alternative 1 is expected to have a **materially more negative** impact on soils and geological features than the NPS-DC as there is likely to be less consideration for broader strategic



objectives for housing, agriculture and sensitive sites. The more ‘ad hoc’ approach has less ability to guide applicants towards favoured sites and may result in the loss of land resources.

Alternative 2: National Development Management Plans

NDMPs are not expected to set out guidance on shaping development or directing which land should be allocated. They may provide greater protections for areas such as the Green Belt, for example, but there is uncertainty at this strategic level. The relative performance of this alternative compared with the draft NPS-DC is therefore **uncertain**.

6.4.9 AoS Objective 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities

Alternative 1: Do Nothing

Alternative 1 is expected to have broadly similar impacts on communities but with less certainty that the effects will be controlled in a consistent way. Data centres have the potential to generate noise and disruption to amenities and access both during the construction period and during their operation, with the noise of equipment and generators introducing ongoing noise pollution, and changes to social infrastructure. As the NPS-DC sets out expectations for mitigation of noise pollution and protections for local communities, there is greater certainty they would be addressed under the NPS-DC preferred alternative than Alternative 1. Therefore, a **more negative** effect is identified for Alternative 1.

Alternative 2: National Development Management Plans

NDMPs may set out protections and provisions to improve social impacts and enhance wellbeing but as they are not available at the time of writing it is uncertain what these would include. Overall, given the NPS-DC and the NDMP would be set at a national level, they might have similar level of controls, but there is less certainty for Alternative 2, therefore an **uncertain** performance is identified.

6.4.10 AoS Objective 10: To promote a strong, diverse, and stable economy

Alternative 1: Do Nothing

Alternative 1 is expected to have a **more negative** effect on the economy than the draft NPS-DC. Fewer data centre proposals could be expected to come forward given that there will be lower confidence that the applications will proceed without clear expectations being set out or a clear policy framework for applicants. This is likely to result in applicants spending greater time and resources in the development and delivery of data centres which will be less beneficial to the local and national economy.

Alternative 2: National Development Management Plans

NDMPs would provide direction for local plans and a greater level of consistency for applicants. This could speed up the ability of applicants to receive decisions and increase the number of data centres delivered. This would be a preferable approach to a Do Nothing alternative, given the objective to increase the roll out of data centres in the UK. This would likely be a **comparable** performance with the draft NPS-DC, as it would also achieve greater certainty and consistency.



6.4.11 AoS Objective 11: Support local economies and promote opportunities to improve education and skills, and employment

Alternative 1: Do Nothing

Alternative 1 is expected to have a **more negative** effect on the local economy than the draft NPS-DC. As the draft NPS-DC sets out clear expectations for community engagement and consideration of employment and skills which would not be guaranteed and consistently applied under the Alternative 1 Do Nothing scenario.

Alternative 2: National Development Management Plans

The increased construction and roll out of data centres, which may be sped up under a NDMP alternative, could be expected to increase demand for jobs in construction. However, the overall operating benefits in terms of employment would be the same across the alternatives. It is uncertain what further provisions a NDMP may set out for applicants to enhance the local economy through education and skills provision. Overall, the relative performance of this alternative compared with the draft NPS-DC is therefore **uncertain**.

6.4.12 AoS Objective 12: Promote the national security of the UK

Alternative 1: Do Nothing

Without strong policy direction, a do nothing alternative is expected to have a **materially more negative** effect on the security of the UK, compared to introducing the NPS-DC. This is because the location and design of data centres under a do nothing alternative will be less likely to consider security considerations than if policy was in place to support applicants through consultation and design review to ensure that the data centres are not vulnerable. Data centres may also form a greater reliance on imported energy such as gas or diesel reducing the energy security of the UK and creating price vulnerability on external energy markets. Under the draft NPS-DC there is greater emphasis on the importance of co-locating with renewable energy, and connection with the national grid. This incentivises developers to rely more on domestic energy sources.

Alternative 2: National Development Management Plans

NDMPs would enable greater consistency across England however, the Government has not indicated that NDMPs would address matters such as security of infrastructure. The initial list of topics included 'design' which may be used to ensure data centres are designed to be resilient to malicious actors and enhance energy security. This alternative would potentially perform better than a 'do nothing' scenario however, although NDMPs may influence the design, it is uncertain if this would address renewable energy co-location, efficiency, or grid connection, therefore its performance is **uncertain**.

6.4.13 AoS Objective 13: Promote sustainable waste management and resource use

Alternative 1: Do Nothing

Alternative 1 Do Nothing, is likely to have **comparable** effects to the NPS-DC alternative, given that the draft NPS-DC is not expected to create consistent application of circular economy practices. Under both alternatives, the developers are likely to operate a 'business



as usual' approach to construction waste and facility technology, which typically has a relatively short lifespan and needs replacement once outdated.

Alternative 2: National Development Management Plans

Depending on how the NDMP is prepared and its scope, it may introduce consistency in waste management and circular design considerations which could be applied across data centre applications. However, there is limited information available to determine if this would occur and this has therefore been assessed as **uncertain**.

6.5 Appraisal of threshold alternatives

Within the NPS-DC, the threshold of application is proposed to be set at ≥ 100 MW, with data centres equal to or greater than 100 MW considered nationally significant. The threshold refers to IT load, which is a way of judging the capacity of data centres. Several alternative options for thresholds have been considered in the AoS, set out in Table 24.

Table 24: Threshold alternatives for data centres

Threshold	Option	Description
Lower threshold + cluster	Option 1:	The NPS applies to all data centre applications
	Option 2:	The NPS will apply only to ≥ 10 MW data centres
	Option 2a:	The NPS will apply to ≥ 10 MW data centres and to a < 10 MW data centre if it is joining an existing cluster of data centres which collectively will have a capacity of ≥ 10 MW
	Option 2b:	The NPS will apply to ≥ 10 MW data centres and to proposals for a cluster of data centres which collectively will have a capacity of ≥ 10 MW
Medium threshold + cluster	Option 3:	The NPS will apply only to ≥ 50 MW data centres
	Option 3a:	The NPS will apply to ≥ 50 MW data centres and to a < 50 MW data centre if it is joining an existing cluster of data centres which collectively will have a capacity of ≥ 50 MW
	Option 3b:	The NPS will apply to ≥ 50 MW data centres and to proposals for a cluster of data centres which collectively will have a capacity of ≥ 50 MW
Proposed	Option 4:	The NPS will apply only to ≥ 100 MW data centres
Higher threshold + Cluster	Option 4a:	The NPS will apply to ≥ 100 MW data centres and to a < 100 MW data centre if it is joining an existing cluster of data centres which collectively will have a capacity of ≥ 100 MW
	Option 4b:	The NPS will apply to ≥ 100 MW data centres and to proposals for a cluster of data centres which collectively will have a capacity of ≥ 100 MW

6.5.1 Review against AoS Objectives

The proposed threshold option is ≥ 100 MW data centres (Option 4). All thresholds are assessed in the context of the NPS-DC, and therefore the AoS assessment set out in this section generally applies to all the alternative options, except where stated. The threshold options have been assessed at a strategic level and as such is limited with regards to making granular comparisons. Instead, the assessment has made the following threshold



assumptions which are considered against the AoS objectives, some of which have been grouped where practical:

1. A lower threshold will result in a greater number of data centre applications, of varying sizes, but generally including smaller footprint data centres; and
2. A higher threshold will limit the number of data centre applications being made, and those which are made will generally have a larger footprint (area) than smaller MW centres.

Although MW capacity does not directly influence the physical footprint of a data centre, the two are closely correlated, as greater MW capacity requires additional technology to be accommodated.

AoS 1: To minimise greenhouse gas emissions and support the transition to a net zero economy

The threshold for data centres would not have a significant impact on the greenhouse gas emissions produced during operation and it is uncertain whether there would be higher emissions due to a presumed greater number of data centres proceeding if a lower threshold is set. There is little difference in potential effect for a lower or higher threshold because, whether the data centres are smaller or larger, the associated emissions are expected to be equivalent.

AoS 2: To maximise adaptation and resilience to climate change

In terms of climate resilience, a greater number of data centres coming forward which may be the case under a lower threshold option would not necessarily lead to greater positive impacts and is highly dependent on the local situation. Therefore, this AoS Objective is not considered to be a differentiator for the threshold alternative options. Clustering was also not determined to influence this objective.

AoS 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality (linked to separate HRA process for Data Centres NPS)

There are potential benefits of greater MW thresholds for data centres, as it is likely that fewer data centre applications would be put forward under the NPS-DC and therefore there would be fewer sites developed with a potentially lower risk to the natural environment. A greater number of data centres being eligible and being brought forward under the NPS-DC may result in greater fragmentation of ecosystems and therefore the lower threshold options are not expected to perform as well as the higher threshold options. Similarly, there are benefits to encouraging data centres to cluster together to avoid fragmentation of habitats through dispersed developments across the landscape with associated supporting infrastructure (e.g. roads, power and water networks). It is likely that this will result in cumulatively greater impacts on biodiversity, due to a greater likelihood of sprawling occurring. For this reason, larger capacity, and clustering (Options 3-3a, 3b, 4-4a and 4b) options are expected to perform better than the lower threshold options (Options 1-2b).

AoS 4: Conserve and enhance cultural heritage assets and their settings, and the wider historic environment; and AoS 5: To conserve, protect and enhance landscape and townscape quality and visual amenity.



A lower threshold may result in a greater number of data centre proposals coming forward under the NPS-DC. Although MW does not necessarily correlate with floor area, there is potential for smaller data centres to be located within townscapes and in proximity to existing built up areas (as opposed to larger centres which may require larger sites in greenfield or industrial locations). This could result in a greater variety of data centre developments coming forward. This may result in a more dispersed lower level of negative impacts, as opposed to larger data centres which may be more noticeable in the landscape but have fewer receptors and therefore all options could result in potential negative effects on this AoS objective but with different nature of effects (e.g. magnitude of effect etc).

Clustering of data centres (Options 2a and 2b, 3a and 3b and 4a and 4b) could also have potentially negative effects, where clustering locates them in proximity to each other. There is likely to be a more significant negative impact if located within sensitive landscapes, but there would be fewer receptors and assets which experience the impacts.

AoS 6: To protect, enhance and increase resilience of water quantity and quality; and AoS 7: To minimise emissions of pollutant gases and particulates and protect air quality

The emission of air pollutants from data centres is predominantly driven by the energy generators used, and this objective is not expected to be a differentiator for size, whether or not there are multiple smaller sources or a larger facility. The quantity of emissions is anticipated to be broadly similar, with the key difference being the distribution across areas, with smaller facilities potentially distributing emissions more broadly (Options 1-2b), vs a potentially greater concentration of air pollutants from larger facilities (Options 3-3a-3b and 4-4b).

Where there could be clustering of facilities closer together coming through under the NPS-DC (Options 2a, 2b, 3a, 3b, 4a and 4b), the potential for higher concentrations of pollutants is increased and may result in communities nearby being exposed to higher concentrations of pollutants.

AoS 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities; AoS 10: To promote a strong, diverse, and stable economy; and AoS 11. Support local economies and promote opportunities to improve education and skills, and employment

A greater number of data centres coming forward under the NPS-DC (Options 1-2b) may cause delays to roll out, due to the need to review multiple applications reducing the ability to deliver developments in a timely manner. Conversely, a greater number of applications may result in more diverse options for data centres and diversity in the market with resulting improvements in choice for consumers.

A greater number of data centres being developed under the NPS-DC (Options 1-2b) may also enable faster deployment of MW capacity through gradual increases over time, i.e. a phased roll out rather than reliance on large, centralised data centres. However, the NPS does not limit smaller MW data centres coming forward, rather creating a path for those that are considered nationally significant.



AoS 12: Promote the national security of the UK

Encouraging clustering of data centres (Options 2a, 2b, 3a, 3b, 4a and 4b), has benefits for efficiency of infrastructure and aligns with the Government planned AI growth zone ambitions. There may be opportunities where data centres are clustered together, such as sharing of required infrastructure for energy such as renewables.

Permitting smaller data centres to join larger clusters (Options 2a, 2b, 3a, 3b, 4a and 4b), can also reduce the vulnerability of relying on few large data centres by spreading risk and capacity across several providers and create a 'nimble' data centre format. These would presumably have greater resilience to shocks and disruptions.

Clustering and creating hubs for data centres may have benefits for supply chains through the ability to create more streamlined supply chains and delivery pathways.

AoS 13: Promote sustainable waste management and resource use

The options are not considered to perform differently against this AoS objective. The outcomes are not expected to be materially different.

6.6 Summary of threshold alternatives assessment

In summary, there is little difference between the data centres threshold alternative options across the topics of climate change and communities. Lower threshold options generally performed worse without the additional benefit of clustering. Higher and medium threshold options (≥ 50 and ≥ 100) generally performed more strongly against the natural environment, resources and national security AoS objectives. In summary, higher and medium thresholds for individual data centre proposals or a variety of sizes, combined with clustering, performed best against the AoS objectives.



7.0 Potential Cumulative and Transboundary Effects

7.1 Introduction

It is necessary to assess cumulative, synergistic, and secondary effects arising from the implementation of NPS-DC. Secondary and indirect effects are those that do not result directly from implementation but occur elsewhere or through a complex pathway.

Cumulative effects could occur when multiple proposals or elements of a plan or project, which individually may have limited impact, combine to create a significant effect due to spatial concentration or overlapping timelines. Synergistic effects arise when two or more effects interact to produce an impact greater than the sum of their individual effects. In accordance with the SEA Regulations, potential cumulative, synergistic, and secondary effects have been considered within the AoS, taking into account of the mitigation identified in Section 6. It is common to consider synergistic and secondary effects within the broader concept of cumulative effects. Potential cumulative effects are therefore discussed collectively in the following section.

7.2 Potential cumulative effects in-combination with other projects, plans and policies

Cumulative effects may arise where the effects of several proposed data centres interact with one another. Cumulative effects can also arise due to effects from the draft NPS-DC combining with effects from other projects, plans and policies (PPPs) in various sectors. However, due to the strategic and high level nature of the NPS-DC, and the lack of any locational and specific detail on any infrastructure developments that are likely to be brought forward, it is not possible to know when any subsequent project proposal will come forward and nor is it possible to predict what other plans and projects will be relevant to future project assessments.

The type of PPPs that could have cumulative or in-combination effects with NSIP data centre developments have been identified to be:

- Applications lodged but not yet determined;
- Projects subject to periodic review;
- Projects authorised but not yet started;
- Projects started but not yet completed;
- Known projects that do not require external authorisation;
- Proposals in adopted plans; and
- Proposals in draft plans formally published or submitted for final consultation, examination or adoption.

7.2.1 AoS Objective 1: To minimise greenhouse gas emissions and support the transition to a net zero economy

Data centres may be connected to the grid network, which is increasingly reducing the reliance on fossil fuels, for data centres that are connected to the grid this will reduce the emissions associated with operational energy usage. However, data centres typically rely on backup energy sources such as diesel generators. Given the expected growth in data



centres through AI growth zones and the introduction of the draft NPS-DC, this has the potential to create more industrial sector reliance on fossil fuels, with cumulative generation of GHG emissions. A potential **negative cumulative effect** is therefore identified in relation to AoS Objective 1. Mitigation/enhancements are identified in Section 5.3.1.4, however it is unlikely this effect can be fully mitigated.

7.2.2 AoS Objective 2: To maximise adaptation and resilience to climate change

The draft NPS-DC grants the Secretary of State powers to consider climate change adaptation on the application as a whole. Additionally, the Secretary of State must be satisfied that the risk of flooding is not increased elsewhere as a result of the development. This will mitigate for potential negative effects from data centre developments, and other developments such as house building and infrastructure, which otherwise could combine and create a potential negative cumulative effect. Furthermore, the draft NPS-DC identifies that the EIA will assess likely cumulative climate impacts. On this basis, a cumulative effect is not identified against AoS Objective 2.

7.2.3 AoS Objective 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality

Housebuilding and the development of energy infrastructure (including renewables e.g. through the Energy NPSs, NPPF) in close proximity to data centres may result in the fragmentation of habitats leading to cumulative negative effects for biodiversity, fauna and flora. This could also potentially affect the achievement of Local Nature Recovery Strategies.

It is noted that there should not be a cumulative loss of habitat, due to the requirement for developers to provide Biodiversity Net Gain (BNG) as part of their applications. Housebuilding and the development of energy infrastructure may lead to a positive cumulative effect against AoS Objective 3 through the requirement of all sites to provide a minimum of 10% BNG. However, there is a risk that the NPS-DC could result in potential negative cumulative (in combination) effects on European and Ramsar sites as it could allow harm to these types of sites. BNG proposals may not necessarily be consistent with the conservation objectives of European or Ramsar sites. Specific data centre proposals will still be required to consider IROPI in the context of their potential adverse effects on relevant European or Ramsar sites and their qualifying features. The third derogation test, Test 3: Secure Compensatory Measures, cannot be undertaken for the draft NPS-DC as it must be specific to the project and the adverse effects identified, if relevant. However, it is expected that securing satisfactory compensation measures could be achieved in projects in all likely scenarios. As this depends on the nature and location of individual projects assessed against the NPS-DC, a potential **uncertain cumulative effect** on AoS Objective 3 is identified. Recommended mitigations are in Section 5.3.3.4.



7.2.4 AoS Objective 4: Conserve and enhance cultural heritage assets and their settings, and the wider historic environment and AoS 5: To conserve, protect and enhance landscape and townscape quality and visual amenity

If clustered together, development under the Housebuilding (NPPF) and Energy Infrastructure (Energy NPSs) may negatively impact the setting of heritage assets through the intrusion of large infrastructure, changing the setting of heritage assets and historic landscapes and communities' enjoyment of them.

Similarly to heritage environments, the clustering of multiple data centres in close proximity will have a greater impact on landscape by introducing new large scale built environment features into the landscape. Further to this, the development of data centres within the Green Belt may impact on its function, resulting in the erosion of open space and impacting landscape character.

Clustering of development near to other large infrastructure, such as solar farms and wind turbines may result in more significant landscape visual effects.

The draft NPS-DC has sought to manage the potential for this cumulative impact by stating that applications which form part of a cluster must assess the negative effects of clustering beyond the single development, ensuring that effects are not considered in isolation. The Draft NPS-DC also notes that applications forming a cluster which are situated in suitable locations with compound benefits, will be given preference. On this basis, the potential for cumulative negative effects is managed, and further mitigation measures are not recommended.

7.2.5 AoS Objective 6: To protect, enhance and increase resilience of water quantity and quality

Potential negative cumulative effects are identified for AoS Objectives 6. There is potential for cumulative negative effects on waterways, where small discharges and or impacts on water consumption can accumulate across industry and uses, given the finite nature of freshwater as a resource and ability for compounding demand at peak periods.

The draft NPS-DC has provisions to mitigate the risk of this occurring, directing applicants to assess the potential cumulative effects of water use within the catchment area against the baseline and other projects coming forward. A consideration of the wider catchments water usage will help mitigate potential cumulative negative impacts on water quality and quality, and further mitigation measures are not recommended.

7.2.6 AoS Objective 7: To minimise emissions of pollutant gases and particulates and protect air quality

The draft NPS-DC has sought to reduce the risks of cumulative air pollution increases by directing that if developed as part of a cluster, the proposal must not collectively exceed air pollution limits. This applies across construction, operation and decommissioning phase. On this basis, further mitigation for potential cumulative effects against Objective 7 are not recommended.



7.2.7 AoS Objective 8: To conserve and enhance soil health and geology and contribute to the sustainable use of land

Soils and geological features are finite resources, and the competing demands of housing development and infrastructure such as data centres have the potential to have cumulative negative impacts on the availability and health of soil resources and geological features. A potential **negative cumulative effect** is therefore identified in relation to AoS Objective 8. Recommended mitigation measures for this objective are identified in Section 5.3.8.4.

7.2.8 AoS Objective 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities

Should a large number of data centre developments be clustered in one area, the impact on nearby communities from noise and light may be significant. Whilst there are benefits to locating data centres in close proximity to renewable energy sites and end users, this may have a negative effect on community health and wellbeing. To reduce the potential for this, the draft NPS-DC directs that as part of an EIA, applicants assess potential cumulative effects on local communities, against the baseline and other projects developed in the local area. This will provide a better analysis of disturbance to communities caused by multiple developments coming forward. Although a potential negative cumulative effect could occur, this should be mitigated via the EIA process.

7.2.1 AoS Objective 10: To promote a strong, diverse, and stable economy; and AoS 11. Support local economies and promote opportunities to improve education and skills, and employment

There could be a potential positive cumulative effect from multiple data centre developments coming forward, through the direct benefits for the local economy, supply chains and construction industry, as well as wider benefits which data centres provide for users of digital services. Potential **positive cumulative effects** are therefore identified in relation to AoS Objectives 10 and AoS 11.

7.2.2 AoS Objective 12: Promote the national security of the UK

Meeting the Government's ambitions to develop robust networks of data centres across England could lead to a potential **positive cumulative effect** in relation to AoS Objective 12, through increasing the resilience of data centres.

7.2.3 AoS Objective 13: Promote sustainable waste management and resource use

The clustering of data centres may result in environmental and health risks if the safe and effective removal of waste is inconsistently addressed through the draft NPS-DC. The clustering of data centres in certain areas in close proximity to energy infrastructure resulting from the draft NPS-DC for Energy may result in the exceedances of capacity at local waste management facilities. A potential **negative cumulative effect** is therefore identified against AoS Objective 13. Recommended mitigations are identified in Section 5.3.13.4.



7.3 Potential transboundary effects

Potential transboundary effects from the implementation of NPS-DC have been approached in a similar way to other potential cumulative effects. The assessment has considered potential effects that originate within England and have the ability to extend across national borders. In the case of the draft NPS-DC, limited transboundary impacts have been identified which are expected to be limited to impacts of data centres on greenhouse gas emissions and the realisation of the UK's transition to a net zero economy. Depending on the location of data centres, there may also be visual effects, if sites are located at the borders adjacent to Wales or Scotland.

7.4 Mitigation and enhancement measures

Cumulative effects have been identified for the following Objectives in Table 25. Mitigations for these effects are identified in Section 5.0, and cross referenced to.

Table 25: Cumulative effects identified

AoS Objective	Potential cumulative effect identified	Mitigation identified
AoS 1	Negative cumulative effect	Mitigation/enhancements are identified in Section 5.3.1.4, however it is unlikely this effect can be fully mitigated.
AoS 2	N/A	N/A
AoS 3	Uncertain cumulative effect	Mitigation measures are identified in Section 5.3.3.4.
AoS 4	N/A	N/A
AoS 5	N/A	N/A
AoS 6	N/A	N/A
AoS 7	N/A	N/A
AoS 8	Negative cumulative effect	Mitigations are identified in Section 5.3.8.4, however it is unlikely this effect can be fully mitigated.
AoS 9	N/A	N/A
AoS 10	Positive cumulative effect	N/A
AoS 11	Positive cumulative effect	N/A
AoS 12	Positive cumulative effect	N/A
AoS 13	Negative cumulative effect	Mitigation measures are identified in Section 5.3.13.4. In addition, data centre applicants should be required to assess potential negative cumulative effects of waste generation during construction taking into consideration the timing of other projects coming forward in the same geographical area.



Note that applications for potential developments require the undertaking of EIA for relevant energy infrastructure schemes. Consideration of cumulative effects is a requirement of EIA and, as such, the potential for cumulative effects (in light of the particular circumstances of the development) would be considered through that mechanism. Similarly, other development types should also be subject to the EIA Regulations and would, as a matter of course, consider the potential for cumulative effects, as noted above, between that development and any data centre infrastructure.

In order to fully understand the potential for and likely extent of cumulative effects, the timing and location of data centre NSIPs as well as details of the technology to be used, would need to be known for both the proposed data centre development, as well as other developments. When considering any proposed data centre development, the Examining Authority and the Secretary of State will take into account any cumulative impacts where development may be developed in close proximity to one another. The draft NPS-DC has included provisions to mitigate the cumulative effects of data centres, when preparing an EIA. NPS-DC directs that potential effects of additional development are to be considered over the plan period for significant cumulative effects, for example in combination with other land uses such as energy generation or large development proposals.



8.0 Monitoring

Monitoring is intended to compare the potential significant effects predicted through the AoS process with the actual effects of implementing NPS-DC. The SEA Regulations also require that measures for monitoring significant effects are described. *Section 17 (1) notes “The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action”.*

The sustainability impacts of NPS-DC can be tracked through existing monitoring frameworks operated by environmental regulators and local authorities. Environmental agencies oversee pollution control and environmental management, including monitoring water quality, resources, and protected habitats and species. Human health protection falls under health authorities and organisations such as the UK Health Security Agency and the Office for Health Improvement and Disparities. Local Planning Authorities review the effectiveness of their spatial plans, using indicators such as employment and access to community facilities and services. At the national level, the Government publishes annual reports on progress against sustainable development indicators, covering greenhouse gas and carbon dioxide emissions, energy use (including renewables), and resource use (including water).

Table 26 sets out draft monitoring recommendations for the NPS-DC focusing on the potential minor negative, negative cumulative and uncertain effects identified in the AoS.



Table 26: Monitoring recommendations

No.	AoS Objective against which a negative effect has been identified	Monitoring / measure indicator	Target	Data Source	Suggested frequency of monitoring	Responsibility for undertaking monitoring
1	AoS 1: To minimise greenhouse gas emissions and support the transition to a net zero economy	Energy efficiency of data centres	Maximise energy efficiency of data centres	- PUE; and - Applicants and operators of data centres under NPS-DC	Annually	- Data Centre applicants and operators in respect of NPS-DC - Department Energy Security & Net Zero (DESNZ)
2	AoS 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality	- National biodiversity; - Biodiversity net gain in data centre developments; - Condition of and extent of European and Ramsar sites	Restoration of natural habitats and biodiversity No adverse effects on the integrity of European and Ramsar sites	- Designated sites and condition - Applicants of data centre developments under NPS-DC - Natural England	Annually	- Data Centre applicants in respect of NPS-DC - Natural England
3	AoS 5: To conserve, protect and enhance landscape and townscape quality and visual amenity AoS 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities	Potential effects on communities (e.g. health, socio-economic, noise, landscape/townscape and light) identified in EIA	Avoid negative effects and maximise positive effects of data centre developments on communities and landscape / townscape	Applicants of data centre developments under NPS-DC	Annually	- Data Centre applicants in respect of NPS-DC - Local authorities



No.	AoS Objective against which a negative effect has been identified	Monitoring / measure indicator	Target	Data Source	Suggested frequency of monitoring	Responsibility for undertaking monitoring
4	AoS 6: To protect, enhance and increase resilience of water quantity and quality	Achievement of Water Framework Directive goals	Achieving good ecological status in water bodies	- Applicants of data centre developments under NPS-DC - The Environment Agency	Annually	- Data Centre applicants and operators in respect of NPS-DC - The Environment Agency
5	AoS 7: To minimise emissions of pollutant gases and particulates and protect air quality	Achievement of national air quality targets	England's main air quality targets	- Applicants of data centre developments under NPS-DC - National and local authority monitoring data	Annually	- Data Centre applicants and operators in respect of NPS-DC - Local authorities
6	AoS 8: To conserve and enhance soil health and geology and contribute to the sustainable use of land	Type of land used for data centre developments	Achieve efficient use of land Avoid loss of soil function	Applicants of data centre developments under NPS-DC	Annually	Data Centre applicants in respect of NPS-DC
7	AoS 13: Promote sustainable waste management and resource use	Generation of construction and critical minerals waste	Reduce construction waste and disposal of critical minerals	- Applicants of data centres under NPS-DC - Operators of data centres under NPS-DC	Construction – monthly Operation – annually	- Data Centre applicants in respect of NPS-DC - DEFRA



9.0 Next Steps

Consultation on the draft NPS-DC will commence in October 2026. Following closure of the consultation period, feedback on the NPS and the AoS will be reviewed and considered by BIST. Before NPSs can be formally adopted by the Government and take effect, they must comply with certain consultation and parliamentary scrutiny requirements. This also includes scrutiny by a select committee or a specially appointed committee.

The NPS-DC will be laid before Parliament. The NPS-DC can then be approved either after a period of 21 days has passed or if the House of Commons votes to approve the statement within the 21 days. The Government is not required to schedule a debate on a NPS-DC.

As soon as possible after the NPS-DC is adopted, an AoS Adoption Statement will be published which will describe the difference the AoS has made to the final NPS-DC, how consultation has been taken into account in the AoS and the reason for selecting the NPS-DC in light of reasonable alternatives.



Appendix A Review of Relevant Plans, Policies and Programmes



Key plans, policies and legislation - International

Table A1: Key plans, policies and legislation - International

Plan, Policy or Legislation	Key Objectives/ Targets/ Guidance	Key Message
Frameworks, principles, and guidelines		
The Paris Agreement, 2015	Aims to limit the global warming change to below 2°C above pre-industrial levels. However, countries aim to limit the increase to 1.5°C to reduce the impacts of global warming. The EU has committed to a binding target of a reduction of at least 40% in greenhouse gas emissions by 2030 compared to 1990.	Support global climate goals and promote international collaboration on clean energy and emissions reduction
UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP Gothenburg Protocol), 2012	The revised protocol specifies emission reduction commitments in terms of percentage reductions from base 2005 to 2020. The EU member states aim to jointly cut their emissions of sulphur dioxide by 59%, nitrogen oxides by 42%, ammonia by 6%, volatile organic compounds by 28% and particles by 22%.	Reduce emissions of harmful air pollutants including sulphur dioxide, nitrogen oxides, ammonia, VOCs, and particulate matter
Bern Convention on Conservation of European Wildlife and Natural Habitats, 1979	The convention has three main aims which are stated in Article 1: - To conserve wild flora and fauna and their natural habitats; - To promote cooperation between states; and To give particular attention to endangered and vulnerable species including endangered and vulnerable migratory species. The UK is a signatory to the Bern Convention but will no longer have its reporting requirements met through EU reporting. Reporting requirements for the UK and devolved governments are detailed in the legislation collectively referred to as the Habitats Regulations.	Conserve wild flora and fauna and protect natural habitats, with a focus on endangered and migratory species
The Convention on Biological Diversity's (CBD's) Strategic Plan for Biodiversity 2011-2020	This plan provides an overarching framework on biodiversity, for all biodiversity-related conventions, the entire United Nations system and all other partners engaged in biodiversity management and policy development. The plan consists of five strategic goals of which 20 further Aichi goals sit underneath: Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society;	Contribute to international biodiversity goals including the Aichi Targets and Kunming-Montreal Framework



Plan, Policy or Legislation	Key Objectives/ Targets/ Guidance	Key Message
	- Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use; - Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity; - Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services; and Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.	
European Landscape Convention 2000 (became binding March 2007)	The Convention outlined the need to recognise landscape in law to develop landscape policies dedicated to the protection, management and creation of landscapes, and to establish procedures for the participation of the general public and other stakeholders in the creation and implementation of landscape policies. It also encourages the integration of landscape into all relevant areas of policy including cultural, economic and social policies. Specific measures include: - Raising awareness of the value of landscapes among all sectors of society and of society's role in shaping them; - Promoting landscape training and education among landscape specialists, other related professions and in school and university courses; - The identification and assessment of landscapes - Analysis of landscape change, with the active participation of stakeholders; - Setting objectives for landscape quality, with the involvement of the public; and The implementation of landscape policies through the establishment of plans and practical programmes.	Assess and monitor landscape change with stakeholder involvement and set objectives for landscape quality
Sixth Assessment: Climate Change Synthesis Report. International Panel on Climate Change (2023)	The IPCC is now in its sixth assessment cycle. This report was developed with the most up to date data to inform global and national trends. The document subsequently contains research which can be used to guide policymakers and decisions.	Ensure that suitable adaptation to climate change risks is addressed
Valletta Treaty (1992) formerly the European Convention on the Protection of Archaeological Heritage	The treaty aims to protect the European archaeological heritage "as a source of European collective memory and as an instrument for historical and scientific study". All remains and objects and any other traces of humankind from past times are considered to be elements of the archaeological heritage. The archaeological heritage includes structures, constructions,	Protect archaeological heritage as a source of collective memory and scientific study



Plan, Policy or Legislation	Key Objectives/ Targets/ Guidance	Key Message
	groups of buildings, developed sites, monuments, moveable objects and other kinds. It also affects both terrestrial and marine assets. The main objectives of the Convention are: - To integrate the conservation and archaeological investigation of archaeological heritage in urban and regional planning policies; - To establish co-operation and consultation processes between archaeologists, and project developers; - To set standards for funding and archaeological and conservational methods used in studying the “knowledge of the history of mankind”; - To promote educational actions and public awareness of the necessity of the protection and investigation of archaeological heritage in Europe; and To foster international co-operation and joint action among all European countries in the field of archaeological resource management by means of developing and exchanging relevant scientific information, technologies and expertise.	
The Convention for the Protection of the Architectural Heritage of Europe (Granada 1985)	The Granada Convention was adopted on 3 October 1985 in Granada (Spain) and came into force on 1 December 1987. The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage. It establishes the principles of "European co-ordination of conservation policies" including consultations regarding the thrust of the policies to be implemented.	Conserve and enhance heritage assets including World Heritage Sites, listed buildings, and conservation areas
UNESCO World Heritage Convention, 1972	The Convention defines the kind of natural or cultural sites which can be considered for inscription on the World Heritage List. The World Heritage Convention aims to promote cooperation among nations to protect heritage around the world that is of such outstanding universal value that its conservation is important for current and future generations. It is intended that properties on the World Heritage List will be conserved for all time.	Conserve and enhance heritage assets including World Heritage Sites, listed buildings, and conservation areas
Ramsar Convention (1971)	The Ramsar Convention focuses on the conservation and sustainable use of wetlands. Its three main objectives are: designating wetlands of international importance as Ramsar sites; promoting the wise use of all wetlands within each country; and fostering international cooperation to support the sustainable management of wetlands and their resources.	Ensure protection of (Ramsar) wetland habitats
Aarhus Convention 2001	The Aarhus Convention is a multilateral environmental agreement that strengthens citizens' opportunities to access environmental information and ensures transparent and reliable regulatory procedures. It promotes three key principles: access to information, public	The AoS will be consulted on and open to scrutiny as per the relevant regulations



Plan, Policy or Legislation	Key Objectives/ Targets/ Guidance	Key Message
	participation in environmental decision-making, and access to justice to challenge decisions that violate environmental laws.	

Key plans, policies and legislation – National

Table A2: Key plans, policies and legislation – National

Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
Legally binding		
Climate Change Act, 2008 (2050 Target Amendment) Order 2019	The Climate Change Act 2008 established a legally binding target to reduce the UK's greenhouse gas emissions by at least 80% in 2050 from 1990 levels. To drive progress and set the UK on a pathway towards this target, the Act introduced a system of carbon budgets including a target that the annual equivalent of the carbon budget for the period including 2020 is at least 34% lower than 1990. The 2019 Amendment to the Act now specifies the requirement to reduce greenhouse gas emissions by 100% (net zero) by 2050.	Deliver the UK's net zero target through coordinated policy, investment, and regional partnerships
Flood and Water Management Act, 2010	The Act requires better management of flood risk, it creates safeguards against rises in surface water drainage and protects water supplies for consumers. It gives a new responsibility to local authorities as Lead Local Flood Authorities to co-ordinate flood risk management in their area.	Ensure that suitable adaptation to flood hazards is considered
Building Regulations 2010 Part L1B (Conservation of Fuel and Power), 2021	The Building Regulations 2000 (England & Wales) set out standards and requirements that individual aspects of building design and construction must achieve. The latest 'Approved document' (Part L1B, 2010) sets out the main changes to the legal requirements for energy efficiency provision in buildings. A 2021 edition of the document was published, with slight amendments also being made in 2023.	Improve energy efficiency across sectors, ensuring buildings meet minimum EPC standards
UK Air Quality Standards Regulations 2010 (as amended)	Implements EU air quality directives into UK law (pre-Brexit), setting limits for pollutants like NO₂, PM₁₀, with a focus on ambient air quality and public health protection. Regulates emissions from transport, industry and energy production, with requirements for monitoring and reporting of air pollution levels. These regulations establish legally enforceable limits for concentrations of key air pollutants in outdoor air that affect public health, including particulate matter (PM10 and PM2.5) and	Meet limits for outdoor air pollutants



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
	nitrogen dioxide (NO ₂). In addition to their direct impacts, these pollutants can react in the atmosphere to form ozone, a harmful pollutant and powerful greenhouse gas capable of long-range transport. The regulations also incorporate the 4th Air Quality Daughter Directive, which sets target levels for specific toxic heavy metals and polycyclic aromatic hydrocarbons in outdoor air.	
The Smoke Control Areas (Authorised Fuels) England (No. 2) Regulations 2014	The Regulations provide a list of fuels which are authorised to be used in smoke control areas in England. The overall purpose of the Regulations is to improve air quality. The compliance actions are as follows: If located in a smoke control area, ensure that only the following fuels are used: • Anthracite; Semi-anthracite; Electricity; Gas; Low volatile steam coals; and Fuels described in the Schedule to these regulations.	In identified smoke control areas, ensure only approved fuels are used
Environment Act 2021	The Environment Act is the mechanism to set long-term, legally binding environmental targets which relate to the natural environment or people's enjoyment of it. Environment Improvement Plans are the government's plans for significantly improving the natural environment over a period of at least 15 years. The Environment Act will require government to review the Environment Improvement Plan at least every five years. The Act requires an Environmental Improvement Plan to be produced, as well as a species abundance target to be set (by 2030). Additionally, from November 2023, developments are required to deliver an onsite biodiversity net gain of 10%. This will be required on small sites from April 2024.	Deliver biodiversity net gain through development, including a mandatory 10% gain
The Planning Act 2008	This legislation establishes how the planning system should handle nationally significant infrastructure projects (NSIPs) and introduced a framework of National Policy Statements (NPS). Each NPS explains the policy it contains, the reasons behind it, and how it reflects Government policy on climate change mitigation and adaptation. They set out Government objectives for infrastructure in a given sector and cover: The contribution to sustainable development. • Integration with wider Government policies. • Consideration of actual and projected capacity and demand. • Relevant safety or technological issues. • Circumstances where addressing adverse impacts is especially important. • Specific locations, where relevant, to give clarity for investment and planning.	The new NPS-DC will set the policy framework for NSIPs as described by the Act. This AoS is being undertaken according to the requirements of the Act



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
	An NPS outlines Government policy for the infrastructure it addresses, including the justification for that policy, the need for new infrastructure, the balance between potential benefits and adverse effects, and measures to mitigate those impacts. It may also define criteria for assessing site suitability and, where appropriate, identify particular locations as suitable or unsuitable for development.	
The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018	These Regulations amend the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. These new regulations set out the procedures to be followed in relation to environmental impact assessment linked to nationally significant infrastructure projects in England and Wales. The objective is to provide a high level of protection of the environment and to help integrate environmental considerations into the preparation of proposals for development to reduce their impact on the environment.	Ensure that developments restore and protect nature values
Environmental Protection Act (1990)	This act brings in a system of integrated pollution control for the disposal of wastes to land, water and air. There are three parts of the Act. These are: - Part I- establishes integrated pollution control and gives Local Authorities new powers to control air pollution from a range of prescribed processes; - Part II- improves the rules on waste disposal; and - Part III- covers statutory nuisances (including light pollution) and clean air	Ensure that pollution to air and water is prevented or minimised Limit light pollution through good design, protecting dark landscapes and nature conservation
Contaminated Land (England) Regulations 2006 as amended by the Contaminated Land (England) (Amendment) Regulations 2012	Outlines the regulations on contaminated land in order to prevent new land becoming contaminated by polluting substances whilst also tackling historic contamination of sites as it poses risks to human health and the environment.	Restore historically contaminated land pollution and prevent further contamination
Environmental Noise Regulations (England) 2006	The European Environmental Noise Directive (END) is implemented in England by The Environmental Noise (England) Regulations 2006 and seeks to manage the impact of environmental noise through strategic noise mapping and the preparation and implementation of noise Action Plans. Under these regulations, the second round of strategic noise mapping has been undertaken, and updated Noise Action Plans have been prepared.	Avoid, prevent, or reduce harmful effects of environmental noise through complying with mapping and action plans



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
The Conservation of Habitats and Species Regulations, 2017	Ensures the protection and conservation of the UK's most important wildlife sites and species. Regulation 61 requires AA of plans and projects likely to have a significant effect on a Habitat Site.	Conserve wild flora and fauna and protect natural habitats
National Environmental & Rural Communities Act, 2006	Natural England's general purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England's general purpose includes: - Promoting nature conservation and protecting biodiversity; - Conserving and enhancing the landscape; - Securing the provision and improvement of facilities for the study, understanding and enjoyment of the natural environment; - Promoting access to the countryside and open spaces and encouraging open-air recreation; and - Contributing in other ways to social and economic well-being through management of the natural environment.	Protect and conserve Sites of Special Scientific Interest (SSSIs) through assessment and protections
National Parks and Access to Countryside Act 2006	The Act introduced powers to designate National Nature Reserves (NNRs), notify Sites of Special Scientific Interest (SSSIs), and enable local authorities to create Local Nature Reserves (LNRs), with these measures later reinforced by the Wildlife & Countryside Act 1981. NNRs represent the finest examples of particular habitats and are of national significance. While often owned and managed by statutory bodies such as English Nature, this is not always the case. Unlike SSSIs, NNRs must be actively managed to maintain their special status.	Comply with access and conservation requirements in identified areas
Wildlife & Countryside Act 1981 (as amended)	The Wildlife and Countryside Act 1981 consolidates and amends existing national legislation to implement the Convention on the Conservation of European Wildlife and Natural Habitats (Bern Convention) and Council Directive 79/409/EEC on the conservation of wild birds (Birds Directive) in Great Britain (NB Council Directive 79/409/EEC has now been replaced by Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version)). The Act provides for the notification and confirmation of Sites of Special Scientific Interest (SSSIs) and the protection of wildlife.	Comply with restrictions on designated sites and mitigate effects to species and habitats during development
Localism Act, 2011	The Localism Act 2011 sets out: New freedoms and flexibilities for local government;	Support inclusive decision-making and local empowerment, in line with the Localism Act



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
	- New rights and powers for communities and individuals; - Reform to make the planning system more democratic and more effective; and - Reform to ensure that decisions about housing are taken locally.	
Equality Act, 2010	The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It is against the law to discriminate against anyone because of: Age; Being or becoming a transsexual person; Being married or in a civil partnership; Being pregnant or having a child; Disability; Race including colour, nationality, ethnic or national origin; Religion, belief or lack of religion/belief; Sex; and Sexual orientation.	Protect people from discrimination under the Equality Act, across all protected characteristics
Ancient Monuments and Archaeological Areas Act, 1979	Legal framework for the protection, investigation, and management of ancient monuments and archaeological sites. Section 61(12) defines sites that warrant protection due to their being of national importance as 'ancient monuments'. These can be either Scheduled Ancient Monuments or "any other monument which in the opinion of the Secretary of State is of public interest by reason of the historic, architectural, traditional, artistic or archaeological interest attaching to it". The Act was updated in 2023.	Ensure that works comply with protections for archaeological sites and scheduled monuments
Environmental Permitting (England and Wales) Regulations 2016	Brings together regulations previously covered by pollution prevention, waste management licensing, elements of the Water Resources Act 1991, the Radioactive Substances Act 1993, and the Groundwater Regulations 2009. Activities remain classified as Part A1, A2 or B, regulated by the Environment Agency (A1) or local authorities (A2 and B). Aims: - Protect human health and the environment - Protect the environment to meet statutory and government targets. - Ensure effective permitting and compliance with environmental requirements. - Deliver clarity and reduce administrative burdens for regulators and operators. - Encourage best practice in facility operations.	Water extraction for cooling and the associated discharges will require permitting at a site level
The Protection of Military Remains Act 1986	The Act protects the sites of sunken military vessels and aircraft both British and foreign within UK waters from unauthorised disturbance. It enables the designation of protected places and controlled areas, prohibiting interference, exploration, or commercial use without prior consent. This legislation upholds respect for those who died in military service and preserves the sanctity of war graves.	Ensure that works comply with provisions for protected places and controlled areas.



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The Historic Buildings and Ancient Monuments Act 1953	Provides for the preservation and acquisition of buildings of outstanding historic or architectural interest and their contents and related property, and to amend the law relating to ancient monuments and other objects of archaeological interest.	Comply with protections for, & historic buildings and monuments or objects of interest.
Planning (Listed Buildings and Conservation Areas) Act 1990	Governs special controls in respect of buildings and areas of special architectural or historic interest. Any alteration, extension or demolition of a listed building in a way that affects its character as a building of special interest requires Listed Building Consent.	Comply with protections for listed, & historic buildings and conservation areas
EU Legislation Transposed or retained in the UK		
Energy Efficiency Directive 2012 (2012/27/EU)	This Directive establishes a common framework of measures for the promotion of energy efficiency to ensure target of 20% improvement in the EU's energy efficiency is achieved. The directive repeals the Cogeneration Directive (2004) and Energy Services Directive (2006). The Directive was amended in 2018.	Promote energy efficiency and reduce emissions
Environmental Noise Directive (END) 2002 (revised)	Aims to avoid, prevent, or reduce the harmful effects of exposure to environmental noise. Provide a framework for noise assessment and management, rather than directly setting noise limits or mandating reduction measures. Each Member State should determine exposure to environmental noise through noise mapping and adopt action plans.	Avoid, prevent, or reduce harmful effects of environmental noise through mapping and action plans
The Birds Directive (79/409/EEC) (formally known as Council Directive 2009/147/EC on the conservation of wild birds), amended 2009	The 2009 Birds Directive replaces the 1979 Council Directive on the conservation of wild birds. It aims to protect all European wild birds and the habitats of listed species, particularly through the designation of Special Protection Areas (SPAs). SA needs to report on any potential effects on birds covered by this directive and all development plans should aim to avoid adverse effects on them. <i>Transposed into UK law through the Wildlife and Countryside Act 1981 and key provisions of directive still apply post Brexit.</i>	Ensure protection of habitats and species
The Habitats Directive (92/43/EEC)	The Habitats Directive led to the setting up of a network of Special Areas of Conservation (SACs) which together with SPAs form a network of protected sites across the EU known as Natura 2000 sites to protect species and habitats. The Habitats Directive aims to protect over a thousand species, including mammals, reptiles, amphibians, fish invertebrates, and plants, and 230 characteristic habitat types. <i>The directive is transposed into UK legislation through the Conservation of Habitats and Species Regulations 2017 (as amended).</i>	Protect SPAs and SACs through AA and planning protections



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Water Framework Directive (WFD) 2000/60/EC	The WFD divides the water environment into water bodies. These can include rivers, lakes, reservoirs, canals, groundwater etc. The WFD requires that there is no deterioration in the ecological health of water bodies and that water bodies should achieve the ecological objectives set out in a River Basin Management Plan. Each country has to: • Prevent deterioration in the ecological status and/or potential of designated water bodies and of their supporting elements, protect them and improve the ecological condition of waters; • Aim to achieve at least good status for all water bodies and their associated elements by 2015. Where this is not possible and subject to the criteria set out in the Directive, aim to achieve good status by 2021 or 2027; • Meet the requirements of Water Framework Directive Protected Areas; • Promote sustainable use of water as a natural resource; • Conserve habitats and species that depend directly on water; • Progressively reduce or phase out the release of individual pollutants or groups of pollutants that present a significant threat to the aquatic environment; • Progressively reduce the pollution of groundwater and prevent or limit the entry of pollutants; and • Contribute to mitigating the effects of floods and droughts.	Prevent deterioration and achieve good ecological and chemical status for all water bodies; Manage flood risk from groundwater, surface water, and ordinary watercourses through strategic planning
Strategies and guidance		
Fourth carbon Budget (Climate Change Committee) (2023-2027) and Seventh Carbon Budget (2028-2032)	The fourth carbon budget, covering 2023–2027, sets out the UK’s recommended emissions reductions on the pathway to an 80% cut in greenhouse gases below 1990 levels by 2050. It builds on previous analysis of the path to 2020 and long-term projections to 2050. By 2030, total greenhouse gas emissions should fall from 574 MtCO₂e today to around 310 MtCO₂e, representing a 60% reduction relative to 1990 levels. Achieving the 2050 target will then require a further 62% reduction between 2030 and 2050. The fifth carbon budget is set at 1,765 MtCO₂ e, over the period 2028-2032. That would limit annual emissions to an average 57% below 1990 levels to achieve genuine emissions reductions they should be accompanied by deep reductions in emissions from electricity generation.	Deliver the UK’s net zero target through coordinated policy and investment



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Clean Growth Strategy, Leading the way to a low carbon future, DEFRA 2017	Clean growth means growing our national income while cutting greenhouse gas emissions. Action to deliver clean growth can have wider benefits for example, the co-benefit of cutting transport emissions is cleaner air which has an important effect on public health the economy and the environment. To reduce carbon emissions some proposed policy measures are supporting improvements to the energy efficiency of buildings, the shift to low carbon transport, and infrastructure for low carbon heating (e.g. district heating networks).	Support clean growth through low-carbon and energy-efficient buildings
Third National Adaptation Programme (NAP) and Fourth Strategy for Climate Adaptation Reporting (2023)	Sets out the actions that government and others will take to adapt to the impacts of climate change from 2023 to 2028, including: - protecting the natural environment - supporting business in adapting to climate change - adapting infrastructure (for example, our electricity networks and railways) - protecting buildings and their surroundings (for example, from hotter temperatures) - protecting public health and communities - mitigating international impacts on the UK (for example, on food supplies imported from abroad)	Ensure that developments consider how they will adapt to the impacts of climate change including heatwaves, flooding and extreme weather
UK Net Zero Strategy	UK Net Zero Strategy: Build Back Greener, is the government's long-term plan to achieve net zero greenhouse gas emissions by 2050. Key goals include: Legally Binding Net Zero by 2050 - Reduce emissions by 78% by 2035 compared to 1990 levels. - Meet carbon budgets set under the Climate Change Act 2008. Sectoral Decarbonisation - Power: Fully decarbonise electricity by 2035 with 40GW of offshore wind and 5GW of hydrogen capacity. - Buildings: Promote heat pumps and energy efficiency upgrades. - Industry: Support low-carbon manufacturing and carbon capture technologies. Green Investment & Jobs - Mobilise £26 billion in government investment and up to £90 billion in private investment by 2030. - Create up to 440,000 green jobs by 2030.	Restrict new fossil fuel power generation sources to meet electricity decarbonisation targets. Support emerging technology growth and new jobs creation. Protect consumer from elevated pricing and support a fair transition. Demonstrate leadership in climate and clean energy



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	Innovation & Technology - Support emerging technologies like carbon capture, hydrogen, and small modular nuclear reactors. - Drive down costs of clean tech through innovation and scale. Fairness & Consumer Protection - Ensure the transition is fair and affordable, protecting vulnerable households. - Use carbon pricing to ensure polluters pay more. Global Leadership - Position the UK as a leader in climate diplomacy. - Encourage other nations to adopt net zero targets	
National Planning Practice Guidance, Climate Change, 2019	The guidance advises how to identify suitable mitigation and adaptation measures in the planning process to address the impacts of climate change.	Ensure that suitable adaptation to climate change risks is addressed
National Planning Practice Guidance, Flood Risk and Coastal Change, 2022	The guidance advises how to take account of and address the risks associated with flooding and coastal change in the planning process. Emphasises flood resilient and resistant design.	Ensure that suitable adaptation to flood hazards is considered, in particular avoidance of flood risk through design
National Flood and Coastal Erosion Risk Management Strategy for England, Environment Agency, 2020	The Environment Agency has a statutory duty to develop, maintain, apply, and monitor a National Flood and Coastal Erosion Risk Management (FCERM) Strategy for England. The strategy contains three overarching ambitions: - Climate resilient places; - Today's growth and infrastructure- resilient to tomorrow's climate; and - A nation ready to respond and adapt to flooding and coastal change.	Ensure developments consider their exposure to flooding and coastal erosion risks
UK Government Resilience Action Plan (2025)	Strengthen the UK's ability to anticipate, withstand, respond to, and recover from a wide range of risks—including cyber threats, climate change, pandemics, and geopolitical instability—by enhancing the resilience of its Critical National Infrastructure (CNI) around three objectives: Continuously assess how resilient the UK is to target interventions and resources effectively, by: assessing risks, including the contexts in which they materialise	Consider the vulnerability and resilience of CNI at a system level



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	• assuring our resilience system to identify problems and make improvements in our planning • developing a comprehensive assessment of the UK's resilience, so that we can consider system-wide interventions Enable the whole of society to take action to increase their resilience, includes: • Improve the resilience of Critical National Infrastructure through targeted interventions based on comprehensive data. Strengthen the core public sector resilience system.	
Digital Infrastructure Strategy (DCMS, 2020)	Outlines the UK Government's vision to deliver world-class digital infrastructure across the country, enabling economic growth, innovation, and improved public services. It supports the broader ambition of making the UK a global science and technology superpower. Key objectives include: Robust Digital Infrastructure • Achieve 85% gigabit broadband coverage by 2025 and 99% by 2030. • Expand 4G and 5G coverage, aiming for most of the population to have access to 5G by 2027. Pro-Innovation Regulation • Develop a light-touch, forward-looking regulatory framework for digital technologies. Secure Digital Economy • Enhance cyber resilience across public services and local authorities. • Ensure secure deployment of smart city technologies and connected infrastructure. • Align with the Network and Information Systems (NIS) Regulations to protect critical digital infrastructure. Levelling Up and Regional Growth • Empower local councils and SMEs to drive digitally enabled economic growth. • Support regional digital ecosystems and hubs.	Recognise the benefits of digitalisation to UK economy and ability to benefit regions Enhance cyber security and protect critical infrastructure
National Infrastructure Assessment (NIC, 2023)	The 2023 National Infrastructure and Construction Pipeline comprises 660 projects, programmes and other investments across a wider range of infrastructure, including £700-775bn of planned and projected investment expected over the next 10 years	Consider integration with broader UK infrastructure investment



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National AI Strategy (2021)	The UK's vision is to make the country a global centre for AI innovation. The National AI Strategy aims to: - Invest and plan for the long-term needs of the AI ecosystem to continue our leadership as a science and AI superpower; - Support the transition to an AI-enabled economy, capturing the benefits of innovation in the UK, and ensuring AI benefits all sectors and regions; - Ensure the UK gets the national and international governance of AI technologies right to encourage innovation, investment, and protect the public and our fundamental values.	Support investment in long term needs of AI and enable access across the UK to its technology Create a pro-innovation regulatory environment whilst protecting public trust
New industrial strategy 'Invest 2035' (2024)	The green paper sets out the Government's vision for a modern industrial strategy; a 10-year plan to deliver the certainty and stability businesses need to invest in the high growth sectors that will drive our growth mission. It will provide the firm foundation for investment that businesses need, allowing businesses to plan for the next 10 years and beyond. New industrial strategy for Britain guided by 4 principles: - Building long term stability: working in partnership with business to identify barriers to investment and build long term confidence. - Renewing our commitment to free and fair trade: proactively support international business to invest in the UK. - Easing the Investor journey: Reducing barriers to investment in the UK and taking a pro-business approach. Being strategic growth-focused state: Compete on quality and higher returns, in services technology and supply chains.	Consider the benefits of creation of economic prosperity and investment Promote a dynamic economy that supports innovation, diversification, and green growth
Industrial Decarbonisation Strategy 2021	The purpose of this strategy is to demonstrate how the UK can maintain a successful industrial sector while meeting the net zero target, without shifting emissions or business overseas, and to set out the government's role in supporting this. It forms part of a wider series of government publications that together outline how the net zero transition will be achieved across the UK economy. The strategy seeks to: - Show how the UK can sustain a strong industrial sector compatible with net zero without offshoring emissions or activity. - Explain how and when government will provide support, ensuring costs and risks are shared fairly between industry, consumers and taxpayers.	Consider the sector pathway for emissions reduction and benefits of industrial clustering and technological innovation



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	Begin a dialogue with industry, its workforce, customers and communities about the role of industry in a net zero future. <i>Potentially will be refreshed in 2025 or 2026</i>	
Powering up Britain (2023)	The UK Government's comprehensive blueprint for transforming the country's energy system to achieve energy security, economic growth, and net zero emissions by 2050. It brings together two major plans: the Energy Security Plan and the Net Zero Growth Plan. Energy Security • Replace imported fossil fuels with cheaper, cleaner domestic sources like wind, solar, hydrogen, CCUS (Carbon Capture, Usage and Storage), and nuclear. • Double electricity generation capacity by the late 2030s. • Fully decarbonise the power sector by 2035. Net Zero Transition • Deliver net zero emissions by 2050. • Respond to the Independent Review of Net Zero and the Climate Change Committee's recommendations. • Support key technologies: offshore wind, CCUS, hydrogen, and nuclear. Economic Growth • Leverage up to £100 billion in private investment by 2030. • Support up to 480,000 green jobs. • Position the UK as a global leader in clean energy innovation and manufacturing. Consumer Protection • Reduce and stabilise energy bills. Infrastructure & Market Reform • Reform planning and energy market systems to accelerate deployment of clean technologies. • Develop a long-term pathway for the UK Emissions Trading Scheme (ETS)	Consider infrastructures wider role in security of energy supply, net zero, ability to position the UK as a leader in clean energy and bring down consumer prices for energy
Green Infrastructure: An integrated approach to land use, 2011	It is important to take a strategic approach to integrated GI because it provides a focus for multiple initiatives operating at various scales. Local or neighbourhood-level projects can contribute incrementally to the bigger landscape-scale picture, so that the whole becomes	Promote green infrastructure networks to support biodiversity,



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	greater than the sum of its parts. Below are seven steps for developing a strategic approach to GI: • Partnering and vision; • Contextual review; • Data audit and resource mapping; • Needs and opportunities assessment; • Design the planned interventions; • Implementation; and • Management and maintenance.	climate resilience, and public wellbeing
UK Infrastructure: A 10 Year Strategy (2025)	Outlines a coordinated approach to economic and social infrastructure, recognising the importance of schools, hospitals, transport, and digital connectivity to living standards and economic growth. Key objectives include expanding high-speed internet through Project Gigabit, supporting clean energy and hydrogen transport networks, enhancing strategic electricity transmission, and rolling out electric vehicle charging infrastructure. The strategy prioritises secure, sustainable digital infrastructure, including AI Growth Zones and data centres, to drive innovation, support new industries, and ensure reliable energy and resource connections for growth across the UK..	Consider the suitability of supporting infrastructure and resources for data centres, as well as data centres core role in the UKs infrastructure strategy
Homes England Strategic Plan 2023-2028	The Plan's aim is: We will support the creation of vibrant and successful places that people can be proud of, working with local leaders and other partners to deliver housing-led, mixed-use regeneration with a brownfield first approach. The Plan is aiming to deliver four objectives: • More land reused and made available for regeneration • Key enabling infrastructure in place to unlock development; • Local places effectively supported to deliver on their regeneration ambitions; and • Mixed-use places that create value and benefit local communities.	Consider the competing demands for land, including wider policy ambitions to increase the housing supply by identifying sufficient and varied land
Integrated Review Refresh 2023 Responding to a more contested and volatile world	An update to the review published in 2021, IR2023 maintains high priority to science and technology (S&T) and cyber, homeland security, and tackling the climate and nature crises. The pillars of the strategy are: • Shape the international environment • Deter, defend and compete across all domains	Ensure that national security concerns are factored into design and siting of infrastructure, including ability to generate strategic advantage and increase network resilience



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	• Address vulnerabilities through resilience • Generate strategic advantage Priorities under the plan relevant are: • Continue to develop our broader deterrence and defence toolkit, including information operations and offensive cyber tools, and make greater use of open source information alongside our intelligence capabilities. • Build on IR2021's prioritisation of strategic advantage in science and technology as a core national priority. create the right ecosystem for S&T to flourish in the UK and keep pace with strategic competitors, including in five priority areas of technology: AI, semiconductors, quantum technologies, future telecommunications and engineering biology	
Public Summary of Sector Security and Resilience Plans 2018	Government's core objective is to reduce CNI's vulnerability to threats and improve resilience by strengthening their ability to withstand and recover from disruption. Its approach focuses on the Four R's: Resistance, Reliability, Redundancy, and Response & Recovery. • Resistance: Concerns direct physical protection (e.g. the erection of flood defences). Resistance is ensured by preventing damage or disruption through the protection of Infrastructure against threats and hazards. This includes reducing vulnerability through physical, personnel and cyber security measures. • Reliability: The capability of Infrastructure to maintain operations under a range of conditions to mitigate against damage from an event (e.g. by ensuring that electrical cabling is able to operate in extremes of heat and cold). • Redundancy: The adaptability of an asset or network to ensure the availability of backup installations, systems or processes or spare capacity (e.g. back-up data centres). • Response & Recovery: An organisation's ability to rapidly and effectively respond to, and recover from, disruptive events	Ensure that developments are designed and sited with consideration of resistance to threats and hazards, ability to maintain operations, system adaptability and ability to respond and recover to disruption
UK Critical Minerals Strategy (2022)	The strategy aims to improve the resilience of critical mineral supply chains, secure long-term access to materials vital for the UK's energy transition and industrial competitiveness, protect national security from supply chain vulnerabilities and position the UK as a global leader in responsible mineral sourcing and innovation. A key action included is the promotion of circular economy methods.	Consider the value of closed loop resource systems and retaining critical minerals



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Resource Security Action Plan 2012	Covers a broad range of renewable and non-renewable resources not covered by government policies on energy and food. Focus short-term is on metals and minerals which have been identified as critical by many UK businesses, including lithium, rare earth metals, and platinum group metals. Focuses on actions by business, government and research: Some key actions include: • Encourages businesses to identify and manage resource risks in their supply chains. • Promotes resource efficiency, recycling, and substitution of scarce materials. • Supports the development of closed-loop systems and circular economy models.	Consider the value of closed loop resource systems and retaining critical minerals Enhance waste and resource management to support circular economy principles
Resources and Waste Strategy (2018)	Combines actions taken now with longer term policy directive set by the 25 Year Environment Plan. Focuses on eliminating avoidable plastic waste, doubling resource productivity and eliminating avoidable waste of all kinds by 2050. The Resources and Waste Strategy identifies five strategic ambitions: • To work towards all plastic packaging placed on the market being recyclable, reusable or compostable by 2025; • To work towards eliminating food waste to landfill by 2030; • To eliminate avoidable plastic waste over the lifetime of the 25 Year Environment Plan; • To double resource productivity by 2050; and • To eliminate avoidable waste of all kinds by 2050.	Ensure that waste minimisation and resource efficiency are considered Support zero avoidable waste by 2050 and eliminate avoidable plastic waste by 2042
Waste Management Plan for England (2021)	It provides an overview of waste management in England and includes industrial waste including construction and demolition. The policies summarised are design to achieve the aims of protecting the environment and human health by preventing or reducing the generation of waste, the adverse impacts of the generation and management of waste and by reducing overall impacts of resource use and improving the efficiency of such use.	Consider benefits to human health and the environment from preventing and reducing waste Promote a resource-efficient economy and reduce the quantity and impact of waste
Clean Air Strategy, DEFRA 2019	The Clean Air Strategy shows how the UK aims to tackle all sources of air pollution, making the air healthier to breathe, protecting nature and boosting the economy. It sets out a wide range of actions on which the UK government has consulted on and shows how the devolved administrations intend to make their share of emissions reductions.	Deliver clean air targets including halving health impacts from air pollution by 2030 Reduce population exposure to PM2.5 and meet legal targets for



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	UK has set stringent targets to cut emissions by 2020 and 2030. Actions have also been set out to meet interim targets such as halving the number of people living in locations above the PM2.5 WHO guideline level of 10 µg/m3.	nitrogen dioxide and other pollutants
Planning Practice Guidance: Air quality (2014)	Provides guidance on how planning can take account of the impact of new development on air quality. The UK also has national emission reduction commitments for overall UK emissions of 5 damaging air pollutants: • fine particulate matter (PM2.5) • ammonia (NH3) • nitrogen oxides (NOx) • sulphur dioxide (SO2) • non-methane volatile organic compounds (NMVOCs)	Reduce emissions of harmful air pollutants
Noise Policy Statement for England; DEFRA, 2010	Through the effective management and control of environmental, neighbour and neighbourhood noise within the context of Government policy on sustainable development: • Avoid significant adverse impacts on health and quality of life; • Mitigate and minimise adverse impacts on health and quality of life; and • Where possible, contribute to the improvement of health and quality of life.	Control environmental, neighbour, and neighbourhood noise to protect health and quality of life
Planning Practice Guidance: Noise, 2019	This guidance sets out that when making plans, or taking decisions about new development, there may be opportunities to make improvements to the acoustic environment. Plans may include specific standards to apply to various forms of proposed development and locations in their area.	Avoid, prevent, or reduce harmful effects of environmental noise
Planning Practice Guidance: Light Pollution, 2019	This guidance sets out how artificial lighting needs to be considered when a development may increase levels of lighting as well as other light pollution considerations planning needs to address.	Limit light pollution through good design, protecting dark landscapes and nature conservation
The Great National Parks Plan National Parks: Beacons for a Sustainable Future (2024)	Our strategic priorities • Tackling the climate crisis: By joining the Race to Zero, English National Parks are leading the way to climate resilience and sustainability.	Consider impacts on landscape features and designated areas including National Parks



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	- At the heart of nature recovery: With the right mix of resources, powers and partnership working, English National Parks could deliver over 145,000 hectares of nature rich areas by 2030 - National Parks for all: Our National Parks should be seen as key components of the Government's health mission. - Driving economic growth: The thriving natural economy within National Parks can drive economic growth across these living, working landscapes	
Landscape Character Framework	Aims to map and describe the diverse landscape of England at a regional scale. It develops the idea of a landscape as a framework leading to better management of the environment. Key components are: Regional landscape character and associated descriptions. The key characteristics of each landscape type are described under 'physical landscape', 'biodiversity', 'historic character' and 'perceptual landscape' headings. Regional landscape character and associated descriptions. Physical landscape UNITS and associated geology, landform, ground type and land cover information upon which the landscape types and areas mapping and descriptions are based.	Use landscape character as a spatial framework to evaluate sensitivity and guide development
Green Infrastructure Framework- Principles and Standards for England, 2023	A newly implemented framework to expand the green and blue networks we have across the UK. The publication highlights the principles of green infrastructure, standards required based on quantity and quality, and a planning and design guide to help users understand the best way to design green infrastructure.	Promote green and blue infrastructure networks to support biodiversity, climate resilience, and public wellbeing
Biodiversity Net Gain, 2023	Biodiversity net gain is a strategy to develop land and contribute to the recovery of nature. It requires an increase of ecological assets by a minimum of 10% following the completion of a development project. Biodiversity Net Gain (BNG) will apply from November 2023 for development in the Town and Country Planning Act 1990, and to small sites from April 2024.	Deliver biodiversity net gain through development, including a mandatory 10% gain
Blueprint for Halting and Reversing Biodiversity Loss: the UK's National Biodiversity Strategy and Action Plan for 2030	The UK NBSAP for 2030 demonstrates the consensus across all four countries of the UK that achieving full implementation of the GBF requires both individual and collaborative efforts, and sets out 23 ambitious UK targets which align with the 23 Kunming-Montreal Global Biodiversity Framework (GBF) targets. All four countries share the following priorities: - Protecting and restoring nature; - Sustainable use and resource management; and	Recognise and halt the decline of biodiversity by taking steps to protect and restore nature



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
	Mainstreaming and finance.	
A Green Future: Our 25 Year Plan to Improve the Environment, 2018	The 25 Year Environment Plan outlines the Government's ambition to leave our environment in a better state than we found it and the steps proposed to take to achieve that ambition. The Plan includes ten key targets across: Clean air, Clean and plentiful water, Thriving plants and wildlife, Reduced risk from environmental hazards (e.g. flooding, drought), Sustainable and efficient use of natural resources, Enhanced beauty, heritage, and engagement with the natural environment, Mitigating and adapting to climate change, Minimising waste, Managing exposure to chemicals and Enhancing biosecurity. Key aims include: - Nature: The plan aims to restore protected terrestrial and freshwater sites, create or restore 500,000 hectares of wildlife-rich habitat, recover threatened and iconic species, and increase woodland cover in England to 12% by 2060 through extensive planting efforts. - Air pollution: Meeting legally binding targets to reduce five major air pollutants, aiming to halve health impacts from air pollution by 2030, while continuing to improve industrial emissions through strong regulation and best practices. - Climate change: Reducing greenhouse gas emissions across sectors including land use, agriculture, waste, and fluorinated gases, in line with the UK's Climate Change Act target of an 80% reduction by 2050 compared to 1990 levels, while ensuring all policies and investments consider future climate change impacts. - Water: Improve water quality by restoring at least 75% of waters to a near-natural state, reducing harmful water abstraction, and increasing the proportion of water bodies meeting environmental standards.	Restore wildlife-rich habitats and protected sites in line with the 25 Year Environment Plan Ensure that industrial emissions reduce pollutants to air and avoid adverse health impacts Ensure future developments are aligned to the UK climate change GHG reduction targets Reduce or avoid harmful water abstraction
The Nature Recovery Network, 2024	The Nature Recovery Network (NRN) is a major commitment in the government's 25 Year Environment Plan. It is a growing national network of wildlife-rich places, stretching from our cities to countryside, mountains to coast. It is supported by green and blue spaces that buffer and connect these wildlife-rich sites. It seeks address the 3 challenges of biodiversity loss, climate change, and public health and well-being. Sets out various government targets and commitments for nature and species.	Ensure that developments restore and protect nature values
Future of an Ageing Population,	The report brings together evidence about today's older population, with future trends and projections, to identify the most critical implications for government policy and the socio-economic resilience of the UK.	Support socio-economic resilience of communities



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
Government Office for Science, 2016		
Select Committee on Public Service and Demographic Change Report: Ready for Ageing, 2013	The report highlights the under provision of specialist housing for older people and the need to plan for the housing needs of the older population as well as younger people.	Provide an appropriate mix of housing types to meet the needs of all community groups
Communities in Control: Real People, Real Power, White Paper, July 2008	Engage and empower local people and communities. Promote local action planning. Enable more power and say for communities in the decisions that affect them.	Promote fairness and inclusion through equality impact analysis and accessible service design
Fair Society, Healthy Lives: The Marmot Review: Strategic review of health inequalities in England-post 2010	Reducing health inequalities is a matter of fairness and social justice. In England, the many people who are currently dying prematurely each year as a result of health inequalities would otherwise have enjoyed, in total, between 1.3 and 2.5 million extra years of life. Ensure a healthy standard of living for all; Create and develop healthy and sustainable places and communities; and Strengthen the role and impact of ill health prevention.	Enable and support healthy lives through planning, especially in deprived communities
Public Health Outcomes Framework, NHS, March 2023	The framework sets out a high-level overview of public health outcomes. It has two high-level outcomes as follows: • Increase healthy life expectancy; and • Reduce differences in life expectancy and healthy life expectancy between communities. It also has six policy objectives: • Give every child the best start in life; • Enable all children, young people and adults to maximise their capabilities and have control over their lives; • Create fair employment and good work for all; • Ensure healthy standard of living for all; • Create and develop healthy and sustainable places and communities; and • Strengthen the role and impact of ill health prevention.	Informative - Consider impacts on public health and standards of living



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
	The framework also examines indicators to help us better understand trends in public health. Since its inception, several indicators have been added, removed or altered to obtain the most effective data.	
Health Equity in England: The Marmot Review 10 years on, 2022	This original report was published in 2012 with a key aim of creating fair employment and good work for all. The report was reviewed in 2022 to see what changes had been made in the ten years since its publication. Findings included: • Employment rates have increased since 2010; • There has been an increase in poor quality work, including part time, insecure employment; • The number of people on zero hours contracts has increased significantly since 2010; • The incidence of stress caused by work has increased since 2010; • Real pay is still below 2010 levels and there has been an increase in the proportion of people in poverty living in a working household; and • Automation is leading to job losses, particularly for low paid, part time workers; the North of England will be particularly affected.	Support socio-economic resilience of communities and working conditions for people
National Planning Practice Guidance: Historic Environment, 2019	In line with the National Planning Policy Framework, local authorities should set out their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets. This could include, where appropriate, the delivery of development within their settings that will make a positive contribution to, or better reveal the significance of, the heritage asset or reflect and enhance local character and distinctiveness with particular regard given to the prevailing styles of design and use of materials in a local area.	Consider the conservation and enhancement of historic environment
Conservation Principles – Policies and Guidance: For the Sustainable Management of the Historic Environment, Historic England, 2015	Conservation Principles: • The historic environment is a shared resource; • Everyone should be able to participate in sustaining the historic environment; • Understanding the significance of places is vital; • Significant places should be managed to sustain their values; • Decisions about change must be reasonable, transparent and consistent; and • Documenting and learning from decisions is essential.	Consider the conservation and enhancement of historic environment



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
Championing Heritage, Improving Lives, Historic England Future Strategy 2021	Relevant objectives are: - The historic environment is protected and sustained for the benefit of our own and future generations; and - The historic environment is an economic asset that is well harnessed. - The strategy has three areas of focus: thriving places, connected communities and active participation.	Consider the conservation and enhancement of historic environment
Water Resource Management Plans (WRMPs) – Regional Aggregates	WRMPs are statutory documents that every water company in England and Wales must produce every five years. Their primary purpose is to ensure a secure, sustainable water supply for the future, while protecting and enhancing the environment. They include forecasting water supply over a 25 year period, adapting to climate change, drought resilience and managing demand. Once implemented the plans should: - Improve resilience to extreme droughts; - Ensure we are prepared for the future impacts of climate change; - Serve a growing population and thriving economy; and - Mark a transition to longer term planning to protect and improve the environment.	Consider long term implications of climate change in water resource planning and actively manage demand
The Environment Agency's Approach to Groundwater Protection, 2018 (updated 2023)	This document updates Groundwater Protection: Principles and Practice (GP3). It contains position statements which provide information about the Environment Agency's approach to managing and protecting groundwater. They detail how the Environment Agency delivers government policy for groundwater and adopts a risk-based approach where legislation allows. The primary aim of all of the position statements is the prevention of pollution of groundwater and protection of it as a resource. Groundwater protection is long term, so these principles and position statements aim to protect and enhance this valuable resource for future generations.	Prevention of pollution of groundwater and protection of it as a resource
River Basin Management Plans	These plans outline how organisations, stakeholders, and communities will collaborate to enhance the water environment. A River Basin District (RBD) encompasses a whole river system including rivers, lakes, groundwater, estuaries and is designed to safeguard and improve water quality.	Protect and enhance rivers, lakes, estuaries, and groundwater through River Basin Management Plans
Future Water - The Government's water	By 2030 at the latest, there is improved quality of the water environment and the ecology which it supports; sustainably managed risks from flooding; more effective management of surface water and sustainable use of water resources.	Improve water quality and ecological health by 2030 and support sustainable water use



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
strategy for England, 2011	The document also sets out various goals for 2030 which combines high environmental standards and protection of consumer interests, with a proportionate and effective approach to regulation. Main goals will be to manage surface water more sustainably, by allowing for the increased capture and reuse of water, slow absorption through the ground,	
National Planning Practice Guidance, Water Supply, Wastewater and Water Quality, 2019	This PPG advises on how planning can ensure water quality and the delivery of adequate water and wastewater infrastructure.	Ensure suitable water and wastewater infrastructure is available or able to be provided to support developments
Water Stressed Areas-Final Classification 2021	This document defines water stress, and what is considered 'serious' water stress. The document identifies Affinity Water Ltd as a company operating under serious water stress.	Address serious water stress and plan for future supply and demand challenges
Health Impact Assessment in Strategic Environmental Assessment (2001)	This is a review of Health Impact Assessment concepts, methods and practices to support the development of a protocol on Strategic Environmental Assessment which adequately covers health impacts. It discusses how decisions taken outside of the health sector can affect the health of individuals and populations by modifying their physical and social environment, and how this in turn affects social and economic development. It describes methods, procedures and practices to carry out health impact assessments of policies, plans and projects.	Ensure that development modifications consider impacts on human health
Safeguarding our Soils: a strategy for England 2009	The purpose of this strategy is to highlight the areas in which soil will be prioritised and to focus attention on tackling degradation threats. The vision of this paper is to try and ensure that by 2030, all England's soils will be managed sustainably and depredation threats tackled successfully and that this will improve the quality of England's soils and safeguard their ability to provide essential services for future generations. Key topics include • Better protection for agricultural soils • Protecting and enhancing stores of soil carbon • Building the resilience of soils to a changing climate • Preventing soil pollution • Future research and monitoring	Protect and enhance soils and sites of geological value through planning policies and decisions
UK Geodiversity Action Plan	The strategic framework developed to promote the understanding, conservation, and sustainable management of the UK's geodiversity—the variety of rocks, minerals, fossils, soils, landforms, and geological processes.	Informative only - Identify and safeguard geodiversity assets



Plan, Policy or legislation	Key objectives/ Targets/ Guidance	Key messages relevant to the NPS-DC
		and integrate them into spatial planning Incorporate geodiversity into development design and restoration to support sustainable land use



Appendix B Scoping Report Consultation Feedback

Feedback was sought from three mandatory consultees, these were: Natural England, Historic England, and the Environment Agency. Feedback was received over email on the scoping report, no feedback was received from the Environment Agency. Material feedback from Historic England and Natural England is summarised in Table B1, minor grammatical matters or format comments have not been included.

Table B1: Scoping Report Consultation Feedback

Consultee	Feedback	Response
Historic England	Terminology - The terms “cultural heritage” and “historic environment” are used interchangeably throughout, which could cause some confusion when it comes to further assessment against the objectives. We would recommend that the term “historic environment” is used instead as it encompasses all aspects of cultural heritage and would achieve a more robust assessment of impact to a wider spectrum of relevant variables.	Noted and amended.
Historic England	Page 25 – The Scoping document indicates that Historic England is responsible for the maintenance of all designated heritage assets in England. However, responsibility for maintenance and ownership is shared among various parties, including Trusts, private owners, and local authorities. It is recommended that this distinction be clarified. Historic England recommends the designation of Listed Buildings, Scheduled Monuments, and Protected Wrecks for final approval by the Secretary of State. We advise the State Party on World Heritage Site nominations, with the World Heritage Committee making the final decision. Local Planning Authorities designate Conservation Areas, while Historic England itself designates registered parks, gardens, and battlefields.	Noted and amended.
Historic England	The local Historic Environment Record (HER) should form part of the baseline evidence with regards to the historic environment.	No action taken. This is by its nature local, and the NPS-DC is at a national scale.
Historic England	Page 26 states that the NPPF will carry more weight than local planning policies, which is incorrect. Under the Planning and Compulsory Purchase Act 2004, decisions on planning applications must be made in accordance with the development plan unless material considerations indicate otherwise. This means the local or development plan is the statutory starting point and carries legal weight in decision-making. In contrast, the National Planning Policy Framework (NPPF) is not part of the statutory development plan; it is a material consideration. While the NPPF provides important national policy guidance and can influence decisions, particularly where the development plan is silent, out-of-date, or inconsistent, it does not override the primacy of the development plan. Planning authorities must therefore first assess proposals against the adopted local policies before considering the broader principles set out in the NPPF.	Deleted the last sentence stating they carry more weight.
Historic England	Page 23 - Key Sustainability Issues relating to health and wellbeing would be improved by including reference to the role the historic environment has to play in helping to achieve this. A sense of identity and belonging is vital for wellbeing, and heritage plays a key role in connecting people to their communities and the places they live in. There is a growing	SLR have revised the key sustainability issues to include reference to the role of the historic environment in

Consultee	Feedback	Response
	body of evidence which shows that heritage engagement can be used successfully in improving health and wellbeing - especially to address issues linked to mental health, loneliness and isolation.	improving health and wellbeing.
Historic England	Page 27 and 28 - The cultural heritage section should identify the risk of dewatering as a key sustainability issue. Data centres often require significant water use for cooling, which can lead to dewatering processes that lower the natural water table in the surrounding area. This change in groundwater conditions can have adverse impacts on buried archaeological remains, especially those preserved in waterlogged environments. Organic materials, such as timber, which rely on anaerobic, saturated conditions for preservation, may begin to degrade rapidly once exposed to oxygen due to a drop in groundwater levels. Dewatering can also cause soil shrinkage or movement, potentially disturbing the stratigraphy and integrity of archaeological deposits or above ground structures. Soil shrinkage due to dewatering can lead to subsidence, causing major structural problems to designated heritage assets (e.g. listed buildings), sometimes leading to partial collapse. As such, the hydrological footprint of data centres must be carefully assessed in planning to avoid unintended damage to heritage assets above and below ground.	Consideration of cumulative water usage has been made within the assessment.
Historic England	Noise and vibration arising from development, such as construction, infrastructure works, or industrial activity, can have both physical and perceptual impacts on heritage assets and their setting. Physically, sustained or intense vibration can cause structural damage to historic buildings, especially those with fragile materials, shallow foundations, or existing vulnerabilities. Cracking, loosening of masonry, and destabilisation of decorative features are common risks.	Noise and vibration added as a risk to heritage assets within the sustainability issues.
Historic England	It would also be useful to include issues of light pollution as a sustainability indicator for the historic environment. Light pollution has the potential to affect the historic environment by disrupting the visual integrity, and setting of heritage assets, especially those with astronomical, spiritual, or landscape associations. Excessive artificial lighting could obscure key features, diminish the appreciation of historic vistas, and erode the sense of place, particularly in rural or designed landscapes. It also affects how heritage is experienced, reducing opportunities for tranquil or contemplative engagement and potentially impacting wildlife that contributes to the site's ecological value.	Consider this addressed already. Light pollution is referenced under communities where it considers impacts on sensitive locations, receptors and views.
Historic England	Generally, the relevant plans international and national programmes, plans and policies have been included, and we welcome inclusion of our Conservation Principles. However, we do advise that the following are added to the National section: The Protection of Wrecks Act 1973 The Protection of Military Remains Act (1986) The Historic Buildings and Ancient Monuments Act 1953 (this provides the legal basis for compiling the register of battlefields, and parks and gardens)	Have revised the PPP to include the proposed documents where appropriate. Local level plans have not been included within the PPP at this stage due to the national scale of the Plan.

Consultee	Feedback	Response
	We note that local level plans etc have not been included. If this was to be included, we would advise that (as a catch-all) conservation area appraisals, Historic Landscape Characterisation studies and HERs are included, as well as local development plans and supplementary planning guidance. It is also important that World Heritage Site Management Plans are also included.	
Historic England	Page 79 – we advise that the historic nature of landscapes and the role they have to play as the backdrop of many individual heritage assets is included in the landscape section to draw together these indivisible strands.	Consider this be covered already under the guide questions.
Historic England	Page 80 – we advise that the impacts of dewatering (as mentioned above), are also included here. We also recommend that the role heritage has to play in helping to deliver economic growth is mentioned alongside tourism and community well-being. Please our research on Heritage and the Economy for further information.	Added a reference to economic growth associated with tourism and wellbeing. Dewatering included under 'water' section of scoping report.
Natural England	We note that the geographical scope excludes the marine environment, although the report hints at the possibility for future data centres in the marine environment. We note that there has been an underwater data centre pilot in Scotland previously. Additionally, throughout the scoping report there are several references to marine elements, for example reference to marine policy, seascapes, and the marine environment (in guide question 3). This creates some ambiguity around how, or if, marine aspects should be assessed. To avoid confusion, we recommend explicitly stating that this NPS applies solely to land based data centres, while acknowledging that there are currently no plans for marine-based developments. We also suggest reviewing the report to ensure consistency when referring to marine elements	Added explicit statement that it would apply only to the land based area. Edited and removed reference to marine area, the sea and coastal water where it may confuse the scope.
Natural England	Natural England notes that several recommendations outlined in other sections of this response are also relevant to the PPP Review and we ask that they are reflected in the key messages. We consider that some of the key messages presented in Table 4 relating to the natural environment should be better aligned with supporting the achievement of the targets set out in the Environmental Improvement Plan. In particular, phrases such as “ensure that suitable adaptation to climate change risks is considered” are too passive. We recommend replacing “considered” with “addressed” or similar, to ensure that climate adaptation measures are actively implemented. Additionally, the terminology used in relation to internationally and nationally designated sites (Special Protection Areas (SPAs), Special Areas of Conservation (SACs), and Sites of Special Scientific Interest (SSSIs)) should be reviewed for accuracy and consistency. For example, terms such as ‘avoiding adverse effects’ and ‘appropriate assessment’ are specific to the Habitats Regulations and therefore do not apply to SSSIs. We would support the inclusion of a clear and robust key message that explicitly seeks to avoid adverse effects on SPAs, SACs, Ramsar sites, and associated compensation	Removed SSSIs from the sentence on SPAs and SACs. Noted that wetland key message applies to RAMSAR sites. Removed text on 'appropriate assessment' for SSSIs and 'avoiding adverse effects' Changed text to 'addressed' rather than 'considered'

Consultee	Feedback	Response
	sites, in line with the Habitats Regulations. This is underpinned by the mitigation hierarchy, which prioritises the avoidance of impacts as the first and most important step, followed by mitigation and compensation where necessary	
Natural England	Although water resources are addressed separately, Natural England advises that this theme also considers the potentially substantial water demands of data centres and their potential impact on the natural environment's resilience to climate change. We recommend integrating this risk across both themes to reflect the inter-dependencies between water availability, climate adaptation, and infrastructure sustainability. Water-dependent protected sites, such as wetlands, chalk streams and riverine ecosystems, are particularly sensitive to changes in water quantity and quality. These habitats rely on stable hydrological conditions to support biodiversity. In areas already under water stress, high abstraction linked to data centre operations may intensify resource competition, disrupt water flows, and heighten vulnerability to climate-related impacts, such as drought and extreme weather. We advise that the AoS framework reflects these risks and promotes development approaches that safeguard water-dependent ecosystems, aligning with relevant water management plans and conservation strategies to support long-term ecological resilience and nature recovery.	Added reference to ecosystems sensitive to water into the issues considered and added a note about considering impacts on ecosystems to the guide questions.
Natural England	We note that this theme only considers the impact of air pollution on human health. We advise that it also assesses the effects of air pollution on the natural environment, including sensitive habitats and species. Alternatively, there could be reference across to the biodiversity, flora, and fauna section, although it is not addressed in that theme either. We advise including background air quality data/ trends from the Air Pollution Information System (APIS) to inform baseline conditions and potential ecological risks.	Added human health impacts into baseline assessment, and sustainability issues for air pollution
Natural England	Natural England advises expanding the baseline data review to include the following elements: Potential Special Protection Areas (SPAs), candidate Special Areas of Conservation (SACs), and listed or proposed Ramsar sites. As well as sites secured as compensation for damage to European sites, which are protected under the Habitats Regulations. Endangered or important species and habitats, including those that are considered irreplaceable and are not protected under the Habitats Regulations. There are a number of datasets, including locations of ancient woodland, priority habitat, chalk rivers (England only), for example, which could be included. Data could also Natural England's Living England map, which provides habitat distribution across England for 2022-23 Presence and spread of Invasive Non-Native Species. Biodiversity targets, including national and international commitments. Risks and opportunities for biodiversity in the context of climate change adaptation. Furthermore, in reference to paragraph 5.2.2.2, which states: "without the NPS, there may	Partially amended in response. E.g., reference to ancient woodland hard to replace habitats considered within the AoS as well as biosecurity concerns. Some matters too detailed for this level of assessment.

Consultee	Feedback	Response
	be less coordination of nationally significant infrastructure and large-scale land uses, and this could potentially work against the goals of nature recovery networks in England”, we recommend that the AoS provide a clearer explanation of the mechanisms through which the NPS will facilitate such coordination.	
Natural England	The potential loss of accessible greenspace, public footpaths, and national trails, including the King Charles III England Coastal Path (KCIIIIECP), should be carefully assessed alongside opportunities for creating new routes and recreational areas. Development of data centres may disrupt existing networks and re-routing of trails such as the KCIIIIECP further inland, may diminish public access and enjoyment. Furthermore, we advise that the impacts of construction activities on community health and wellbeing are considered during site selection. Construction phases may span several years, and prolonged disruption to footpath routes and access to natural spaces may negatively affect health and wellbeing. We advise that these factors are integrated into the AoS to ensure long-term benefits for local communities being able to access nature.	Added to sustainability issues under human health and wellbeing.
Natural England	We note that this theme only considers the impact of noise pollution on human health. We advise that it also assesses the effects of noise pollution on the natural environment, including sensitive species. Alternatively, there could be reference across to the biodiversity, flora, and fauna section, although it is not currently addressed in that theme either.	Updated reference to impacts of noise on wildlife under the noise chapter of the scoping report.
Natural England	We recommend that the baseline data review includes defined heritage coasts and the Broads, due to their recognised value in landscape planning and conservation. Other relevant data includes national character areas and green belt. In paragraph 5.3.4, we consider the focus should be on the reasons for landscape designation, rather than habitat types and SSSIs, which are not directly linked to landscape designation. Referencing the condition status of SSSIs is not relevant in this context. The current wording does not adequately reflect the distinct differences between landscapes in terms of their designation status and roles in the land use planning system. Nationally designated landscapes (National Parks, The Broads, and National Landscapes (legally designated as Areas of Outstanding Natural Beauty)) are given the highest level of protection under national planning policy. Furthermore, the Levelling Up and Regeneration Act (2023) introduced a statutory duty (Section 245) requiring relevant authorities (including public bodies, decision-makers, and utility providers) to actively further the statutory purposes of these designations. In addition, other valued landscapes may be identified and defined locally through Local Development Plans and although they are afforded a significantly lower level of protection, primarily through local planning policies, we consider they should still be included within the report. In paragraph 5.3.6, the first point listed under “Landscape” (pg. 27), appears to be more appropriately aligned with the natural	Have moved text which more relevant to biodiversity to the natural environment section of the scoping report and added the following text: <u><i>Under the UK planning system nationally designated landscapes (including National Parks (such as the Broads) and National Landscapes) have the highest level of protection afforded. Other valued landscapes may be identified and protected by local planning policies, with a lower level of protection.</i></u> <u><i>Added 'landscape features' to key messages.</i></u>

Consultee	Feedback	Response
	environment theme and we advise the key sustainability message covers potential impacts to landscape features.	
Natural England	Natural England recommends that the baseline data review is expanded to include consideration of areas with a high likelihood of being Best and Most Versatile (BMV) agricultural land, in line with national planning policy requirements. This is essential to ensure that land of the highest agricultural value is appropriately identified and safeguarded during site selection and development planning. Additionally, we consider peat soils should be explicitly considered due to their importance for carbon storage, biodiversity, and water regulation. We also advise inclusion of SSSIs designated for geodiversity. These sites represent nationally important geological features and processes, and their inclusion is necessary to ensure that geodiversity is adequately considered within the AoS.	Included reference to Peat soil and BMV soils. SSSI are referenced under biodiversity
Natural England	Objective 1: To minimise greenhouse gas emissions and support the transition to a net zero economy Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions. Specifically: - We advise including a guide question that explicitly focuses on reducing both direct and indirect greenhouse gas emissions across all phases of data centre development (construction, operation, and decommissioning). - We recommend including a guide question that encourages the use of carbon removal approaches, particularly Nature-based Solutions (NbS), to help offset residual emissions and contribute to long term carbon sequestration. - We suggest revising the existing guide question, "Protection of carbon stores/sinks?," to also promote the creation and enhancement of new carbon sinks. This could include restoration and expansion of natural habitats, integration of blue/green infrastructure and improvement of soil health to maximise carbon storage potential.	Have retained focus on energy efficiency and emissions reporting in guide questions, have not included reference to entire life cycle emissions. Reference to nature based solutions that have carbon sink benefits are included in guide questions for biodiversity. Have not expanded existing carbon sinks guide question to enhancement and retained as protection/avoidance.
Natural England	Objective 2: To maximise adaptation and resilience to climate change Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions. Specifically: - We advise including explicit reference to local Flood Risk Management Plans and encourage the use of natural flood management techniques, where appropriate, to reduce vulnerability to flood risks. - We recommend expanding the first guide question to expect that data centres will be designed to remain resilient throughout their operational lifespan. This could include proactive management of risks such as flooding, coastal erosion, and extreme weather events, with an emphasis on working with natural processes. - While we welcome that green infrastructure is included as a guide question, we recommend also including blue infrastructure (such as wetlands,	Noted and amended.

Consultee	Feedback	Response
	rivers, and coastal systems), as critical components of climate adaptation and ecosystem resilience	
Natural England	Objective 3: To protect, restore and enhance biodiversity promoting net gain, and supporting ecosystem resilience and functionality (linked to separate HRA process for Data Centres NPS) Natural England notes that while this objective references the HRA process, not all elements listed in the guide questions are directly linked to the Habitats Regulations. We recommend clarifying this distinction to avoid misinterpretation and ensure accurate application of relevant legal frameworks. Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions. Specifically: • We advise including potential, candidate or proposed designated sites, as well as compensation sites, which are afforded the same level of protection under the Habitats Regulations, in the first guide question. • We advise incorporating the mitigation hierarchy (avoid, mitigate, compensate) as a fundamental principle in assessing biodiversity impacts. • Drawing from the approach taken in the Energy NPS AoS, we recommend including clearer guide questions such as: Avoid the direct loss of, or indirect harm to, 'Habitats Sites' (SPAs, SACs, Ramsar sites), including candidate SPAs, proposed SACs, Sites of Community Importance (SCI), proposed Ramsar sites, and compensation sites? Reduce or avoid impacts to habitats with important roles in carbon sequestration?	Noted and amended.
Natural England	Objective 3 • We advise including a guide question to ensure alignment with Local Nature Recovery Strategies, where these are in place, to support strategic biodiversity planning at the local level. • We advise including a guide question to addressing the role of development in managing the spread of Invasive Non-Native Species. • We suggest including a guide question focused on contributions to national biodiversity targets as set out in the Environmental Improvement Plan, for example: Contribute to the long-term target to reduce species' extinction risk in England by 2042, when compared to the risk of species' extinction in 2022. Contribute to the long-term target of increasing woodland and tree cover by at least 16.5% of England's land area by 2050, outside existing woodland	Have not included these recommendations and consider that the current guide questions suitably address issues.
Natural England	Objective 5: To conserve, protect and enhance landscape and townscape quality and visual amenity Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions to better reflect the statutory importance of	Updated guide questions to include reference.

Consultee	Feedback	Response
	designated and valued landscapes and current legislation. Specifically: • We advise including a clearer guide question that recognises the legal protections afforded to National Parks, the Broads, and National Landscapes. For example, does the NPS avoid development within National Parks, the Broads, and National Landscapes? • We advise including a guide question to consider how development proposals further the statutory purposes of designated landscapes.	
Natural England	Objective 6: To protect, enhance and increase resilience of water quantity and quality Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions to better reflect the pressures on water resources and the importance of sustainable water management, including to support protected habitats. Specifically: • We advise expanding the guide questions to explicitly address the need to safeguard the availability of water resources, particularly in areas experiencing water stress. This includes recognising the cumulative impact of high-water demand developments such as data centres. • We advise expanding the guide questions to promote measures to minimise water consumption across all phases of development (construction, operation, and decommissioning), through water efficient technologies and practices. • We recommend including a guide question that supports the integration of Sustainable Drainage Systems (SuDS) into site design, wherever feasible, to manage surface water run-off, reduce flood risk, improve water quality, and support biodiversity. • We advise including a guide question that supports development proposals to protect and improve water quality, including the prevention of pollution and the restoration of degraded water bodies. • We suggest that guide questions support alignment with relevant water management plans and strategies. • We advise that guide questions consider the role of natural systems (such as wetlands, rivers, and aquifers) in regulating water quantity and quality and promote working with natural processes to enhance ecosystem resilience, where possible	Updated guide questions.
Natural England	Objective 8: To conserve and enhance soil health and geology and contribute to the sustainable use of land Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions to ensure that soil and geological considerations are fully addressed. Specifically: • We advise that guide questions explicitly reference SSSIs designated for their geological interest,	Added reference to SSSI sites geological value. Added reference to avoidance of BMV. Added reference to management of soils

Consultee	Feedback	Response
	as these sites represent nationally important geological features and processes. • In relation to the protection of BMV agricultural land, we advise strengthening the guide questions to align with the policy framework and support the avoidance of development on high-quality agricultural land, classified as BMV. • We recommend that the AoS recognises the finite and non-renewable nature of soil as a resource. Guide questions could promote the appropriate management, conservation, and storage of soils during all phases of development, particularly during construction, to prevent degradation and loss of soil function. • Further to point 3, we would welcome a guide question that promotes land use practices which enhance soil health, including organic matter retention, erosion control, and restoration of degraded soils. • We advise including a guide question that supports and recognises multifunctional land use that contributes to biodiversity, carbon storage, and water regulation.	as a resource under guide question. Added reference to degraded soils under the contaminated land guide question. Did not change water, carbon and biodiversity reference, as these are covered under separate topics.
Natural England	Objective 9: To minimise disturbance to local communities, maximise positive social impacts and protect and enhance the health and wellbeing of communities Natural England recommends strengthening this objective by expanding the scope and ambition of the guide questions to ensure that community wellbeing through access to nature is fully considered. Specifically: • We advise that guide questions assess the potential impacts of development on public access to natural spaces, both through disruption or re-routing public access due to construction or operational activities, and the opportunities to enhance public access through the creation of new recreational routes, green corridors, and open spaces. • We recommend that guide questions take into account nationally significant routes, such as national trails and the King Charles III England Coastal Paths. • We advise that guide questions recognise the benefits of developments that help address inequalities in access to green and blue infrastructure.	Updated and amended guide questions.
Natural England	Appendix A We advise that the following are included in the list of relevant plans, policy, and legislation: • Kumming-Montreal Global Biodiversity Framework (2023) • Countryside and Rights of Way (CROW) Act (2000) • The Environmental Targets (Water) (England) Regulations (2022) • The Environmental Targets (Marine Protected Areas) Regulations (2022)	List reviewed, consider current set of PPP sufficient given the level of assessment and scope.

Consultee	Feedback	Response
	• Levelling Up and Regeneration Act (2023) • The Biodiversity Gain Requirements Regulations (2024) • National Planning Policy Framework (December 2024) • Making Space for Nature (2010): • The Economics of Biodiversity: The Dasgupta Review (2021): • Meeting our future water needs: a national framework for water resources – accessible summary. Policy paper (2020): • Plan for Water: our integrated plan for delivering clean and plentiful water. Policy paper (2023): • Environmental principles policy statement (2023): • England Peat Action Plan (2021): • 30 by 30 on land in England: confirmed criteria and next steps. Policy paper (2024): • UK Biodiversity Framework (2024): • UK National Biodiversity Strategy and Action Plan (2025): • The Environmental Benefits from Nature Tool - Beta Test Version, Natural England (2024): • Nature Networks Evidence Handbook. Natural England (2020): • Natural England's climate change risk assessment and adaptation plan (2021): • Carbon Storage and Sequestration by Habitat. Natural England (2021): • Geoconservation: Principles and Practice. Natural England (2023): • National Character Areas (England), Natural England (2023): • River Basin Management Plans • Shoreline Management Plans • Flood Risk Management Plans	



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