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Kate Alessi, Google UK Managing Director
6 Pancras Square
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Dear Kate

Buglife is writing to express its deep concern about the impact of a proposed Google data centre campus on the Arena Essex Local Wildlife Site (LoWS) in Thurrock, South Essex¹. The proposed Thurrock Data Centre, development by the Google-associated 'Global Infrastructure UK Limited', would have a devastating impact on the site's nationally important invertebrate populations and other wildlife

Arena Essex has been shaped by its complex history of quarrying, landfill and motor sports. It has produced a unique mosaic of brownfield features, calcareous grassland, flowery Thames Terrace Grassland, bare ground, scrub and young woodland. It is home to a nationally important assemblage of invertebrates, including Brown-banded Carder Bee (*Bombus humilis*), Five-banded Weevil-wasp (*Cerceris quinquefasciata*) and the Dingy Skipper butterfly (*Erynnis tages*) - with many more to be found – as well as rare plants such as Endangered Broad-leaved Cudweed (*Filago pyramidata*) and birds such as Red Listed Nightingale (*Luscinia megarhynchos*).

An application for the Thurrock Data Centre was submitted to the local planning authority, Thurrock Council, on 12th May 2025 (Application ref: 25/00573/OUT) and is currently being considered. Buglife's assessment of the plans reveal that over 80% of the site's 'Open Mosaic Habitat on Previously Developed Land' (OMHPDL)² would be lost, the Priority Habitat for wildlife-rich brownfield that is listed under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006³. The site also supports irreplaceable Thames Terrace Grassland – a unique habitat that Natural England, the Government's adviser for the natural environment in England, says is now limited to just tens of hectares remaining. The value of these habitats for invertebrates is underlined by their inclusion in the Thames Estuary North Important Invertebrate Area (IIA)⁴. IIAs are places that are home to nationally or internationally significant invertebrate populations and their habitats. Many of the rare and threatened species on the Arena Essex site would be lost if the development goes ahead, and the Local Wildlife Site vastly shrunk and dramatically reduced in quality.

However, the impacts of this development are wider reaching than just the Arena Essex site itself. As already outlined, it is a core part of the Thames Estuary North IIA, that supports a unique and nationally important

¹ <https://www.thurrock.gov.uk/sites/default/files/assets/documents/localwildlifesitesregister2022-202312-v01.pdf>

² <https://data.jncc.gov.uk/data/a81bf2a7-b637-4497-a8be-03bd50d4290d/UKBAP-BAPHabitats-40-OMH-2010.pdf>

³ <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

⁴ https://cdn.buglife.org.uk/2025/07/North-Thames-Estuary-IIA-Profile_final.pdf

Saving the small things that run the planet

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assemblage of invertebrates. This is reflected in Natural England's commitment in its public designation pipeline to identify Sites of Special Scientific Interest (SSSI) for 'Thames Estuary Invertebrates, Essex and Kent'⁵. Key sites in this once extensive network have been destroyed for sprawling port developments, industrial expansion, inappropriate restoration schemes and housing development. Unfortunately, yet more sites will be lost in the coming years following the approval of the Lower Thames Crossing and are threatened by further port expansion as part of Tilbury 3 proposals⁶. The loss of the Arena Essex Local Wildlife Site, alongside both historic losses⁷ and ongoing losses of habitat in the region, has the potential to be devastating for the Thames Estuary's invertebrates, which require a network of sites for their survival. This has been highlighted in a recent Guardian article on how brownfield sites such as Arena Essex can be havens for wildlife⁸.

Google's plans to raze the site and create a data centre campus are at odds with the claims and commitments in its 2025 Sustainability Report⁹. The report claims that Google is "*Cultivating nature on our campuses*" and "*rebuilding nature in the very places it's been paved over*". It boasts that "*As of the end of 2024, we created or restored approximately 74 acres of habitat*" on Google's campuses. However, as the Thurrock Data Centre application paperwork states, in this instance, "*The Proposed Development will result in approximately half of the habitats within the LWS being lost*" - the equivalent of over 32 acres- through this one campus development alone. The 2025 Sustainability Report even describes creating three acres of pollinator-friendly landscaping in California and leaving "*better functioning ecosystems*", yet in the UK Google would undermine a crucial site for the persistence of pollinators such as Brown-banded Carder Bee in the Thames Estuary.

Building the proposed Thurrock Data Centre on the Arena Essex Local Wildlife Site would lead to the loss of irreplaceable habitats and impact on already struggling populations of threatened invertebrates that have suffered from habitat loss and fragmentation across the Thames Estuary. This is in stark contrast to the ambition of "*Cultivating nature on our campuses*" which Google projects in its 2025 Sustainability Report.

Buglife is writing to urge Google to reconsider its plans for the Thurrock Data Centre and secure the future of the diverse habitats at Arena Essex. This call has already been supported by more than 2,500 supporters who have signed a Buglife led petition¹⁰ that asks for Google to search for an alternate site for its development- one that doesn't pit development against nature.

We would welcome the opportunity to discuss this with you.

Yours sincerely



Craig Macadam
Co-Leader and Director of Conservation

⁵ <https://www.gov.uk/government/publications/natural-england-designations-programme-for-areas-sites-and-trails/natural-englands-designations-programme>

⁶ <https://www.buglife.org.uk/campaigns/stop-tilbury-3/#Tilbury%20Action>

⁷ https://cdn.buglife.org.uk/2019/08/The-State-of-Brownfields-in-the-Thames-Gateway_0_0.pdf

⁸ <https://www.theguardian.com/environment/2025/aug/10/brownfield-abandoned-oil-refinery-thriving-wildlife-conservation>

⁹ <https://www.gstatic.com/gumdrop/sustainability/google-2025-environmental-report.pdf>

¹⁰ <https://you.38degrees.org.uk/petitions/save-arena-essex-tell-google-to-search-elsewhere>