



**Scotland's
countryside
charity**

APRS
Augustine United Church
41 George IV Bridge
Edinburgh EH1 1EL
kat@aprs.scot

12 June 2026

Dear First Minister,

Re: Scottish Government policy on hyperscale data centres and the planning system

Action to Protect Rural Scotland (APRS) and the Environmental Rights Centre for Scotland (ERCS) are concerned about the large number of hyperscale data centres coming into Scotland's planning system and the lack of national guidance given the potential impacts, both local and cumulative, on Scotland's communities, environment, and climate targets, and urge you, again, to introduce an immediate moratorium on granting permission for new planning applications until these risks are fully assessed.

We previously [wrote to Scottish Ministers in December 2025](#) expressing our concern at that lack of a clear definition for what constitutes a 'green data centre' and absence of mandatory requirements to conduct an Environmental Impact Assessment for new developments, calling on the Scottish Government to pause all planning applications to give time to examine the implications for Scotland's energy grid, energy prices and net zero targets, as well as other impacts on local communities and the environment.

We therefore welcomed your [answer during First Minister's Questions on Thursday 25 June](#) indicating that you were 'giving active consideration to whether the Scottish Government should be providing planning guidance to balance the rapid proliferation of hyperscale data centres with national energy and climate goals that are vital to our future prosperity,' and that given the number of live applications, you will consider local authorities' requests for planning guidance as a priority.

It was also heartening to hear the Cabinet Secretary for Climate Action and Rural Affairs say, at [Portfolio Questions on Wednesday 24 June](#), when being asked about the AI Growth Zone, that data centres "must have strict Environmental Impact Assessments associated with them". APRS's research for the data centre map shows that 7 out of 13 applications for hyperscale AI data centres which have been screened by local authorities, including the AI Growth Zone site at Chapelhall, will not, as things stand, be required to produce a full Environmental Impact Assessment (see table below). The Data Centre Trade Association (DCA) also supports this view, in a [paper](#) published in July they state: 'The DCA also believes Environmental Impact Assessment should form a standard component of evaluation for all major data centre developments.'

We hope that the Scottish Government will now heed the calls of Edinburgh City Council, North Ayrshire Council, and the SNP National Council and introduce a moratorium on all planning applications for hyperscale AI data centres. This will allow time for guidance to be produced and to ensure that all hyperscale AI data centres are

required to do EIAs. Precedents for such a pause include the planning directions related to Spaceports (2020) and unconventional oil and gas developments (2019).

The urgency for a moratorium is real because there are two planning applications, for Auchtertool and Larbert, where the deadline for public comments and objections has already passed, and where the local authority needs to make a decision. One of these, Auchtertool, the developer has not been required to provide an EIA. Neither development can be properly considered without a definition of a green data centre and associated guidance.

Given the urgency of the need for this work to be done, we would like to raise your attention to something vital to include when considering this guidance. This is what the intention was of the phrase 'green data centres' as expressed in NPF4.

The greenhouse gas emissions calculations for the NPF4 demonstrate the type of data centre intended by the framework. The lifecycle greenhouse analysis of the NPF4 National Developments was carried out in 2022 and [APRS looked in detail](#) at the analysis covering the section which includes 'green data centres', i.e. the statement of need for National Development 12: Digital Fibre Network.

The assessment methodology compares projected greenhouse gas emissions in construction, operation over the development's lifetime, and decommissioning, against a baseline representing the existing situation. This analysis concluded that there could be a small amount of additional use of data centres if people have more devices, or use the internet more, but that this would be counterbalanced by greenhouse gas savings from less travelling, resulting in a negligible overall effect. It is clear that the hyperscale AI data centres currently being branded as 'green data centres' by developers, are not addressed at all in this analysis.

For the greenhouse gas analysis to be at all credible, it must be the case that National Development 12 was envisaging a slight increase in the type of data centres which existed at the time (2021/22) which are much smaller in scale and in energy demand [1] than the proposed hyperscale data centres. The Scottish Government's [2021 digital strategy](#) was anticipating a zero carbon scenario for digital developments.

NPF4 was published only a few months after the launch of Chat GTP, before the current race for AI and the rise of hyperscale AI data centres. We would therefore expect that any definition or guidance around the term 'green data centre' would incorporate the intention of the phrase 'green data centres' as expressed in NPF4.

We believe that the Scottish Government needs to urgently review its policy and planning guidance on data centres. This should consider how robust analysis of the environmental impacts of different scales of data centres (including hyperscale data centres) at individual and cumulative levels will be carried out, and address clear deficiencies in NPF4. We are concerned that the lack of clarity around 'green data centres' appears to have created a planning loophole; and that data centres were included in a national development despite the statement of need not referring to them. We would like to see the Scottish government develop and publicly consult on an

overarching policy for data centre development with an accompanying Strategic Environmental Assessment.

To be very clear, we are not calling for decisions to be made at Government level, we are asking for a moratorium, so that the impacts can be thoroughly and independently assessed, and so that a strategic approach can be taken, and that these can be incorporated into guidance issued to local authorities. Only in this way can we minimise the adverse effects of hyperscale data centres on the environment, the achievement of national climate targets and secure and affordable electricity supply for communities.

We reiterate the asks from our December 2025 letter to ask the Scottish Government to introduce a moratorium immediately to prohibit planning permission from being granted for any new data centre developments, and for that moratorium to remain in place while the Scottish Government carries out the following steps to ensure that a strategic approach is taken to data centre developments which minimises their adverse effects on the environment, the achievement of national climate targets and secure and affordable electricity supply for communities:

1. Carry out and publish an analysis of the impact of data centres on Scotland's grid and net zero pathway including consideration of the cumulative impact of data centres coming forward on Scotland's energy supplies, energy prices and climate targets;
2. Publish a planning circular (or some other form of planning guidance which would form a material consideration to be considered by planning authorities when determining planning applications) which clearly defines what constitutes a 'green data centre.'
3. Amend the Town and Country Planning (Environmental Impact Assessment) (Scotland) Regulations 2017 to make environmental impact assessments mandatory for all planning applications for data centres.'

We would very much appreciate the opportunity to meet with you along with representatives from some of the communities raising concerns about data centres to discuss these matters further.

Yours sincerely,

Dr Kat Jones, APRS



**Scotland's
countryside
charity**

Benjamin Brown, ERCS



[1] In 2024 [Scottish Enterprise](#) estimated there was 10MW of data centre capacity in Scotland, and the [UK Government](#) estimated 30MW.

Extract from the information in the [APRS Data Centre Map](#)

No EIA Required - red highlight

EIA required - green highlight

Map-View Site Name	Stage of Planning	Developer	Capacity MW	More Information
Ravenscraig North Lanarkshire	PAN done EIA not required Awaiting application	Apatura	550MW	aprs.scot/ravenscraig-dc
Coldstream Borders	PAN done EIA not required Awaiting application	Apatura	300MW	aprs.scot/coldstream-dc
Plains (Drumshangie) North Lanarkshire	PAN done EIA not required Awaiting application	Apatura	500MW	aprs.scot/drumshangie-dc
Auchtertool Fife	PAN done EIA not required Planning Permission in Principle submitted	ILI Group	600MW	aprs.scot/auchtertool-dc
Larbert Falkirk	PAN done EIA required Full Planning application submitted	Apatura	300MW	https://aprs.scot/apatura-larbert/
Hurlford East Ayrshire	PAN done no further progress	ILI Group	540MW	aprs.scot/hurlford-dc/
Hunterston, West Kilbride North Ayrshire	PAN done and EIA scoping submitted. Awaiting result	Eneus Energy Limited	unknown (but onsite BESS is 450MW)	https://aprs.scot/hunterston-data-centre/

Newhouse North Lanarkshire	PAN done and EIA scoping submitted.	ILI Group	400MW	aprs.scot/newhouse-dc
South Gyle Edinburgh	EIA not required Planning Application (PPP) refused, developer appealed. SG reporter has now said an EIA will be required	Shelborn Drummond Ltd	212.42MW	aprs.scot/gyle-dc
West Edinburgh (Wester Hermiston)	PAN done EIA not required Awaiting application	Apatura	200MW	aprs.scot/hermiston-dc
West Calder (Freeport) West Lothian	PAN done no further progress	Apatura	250MW	aprs.scot/freeport-dc
Bishopbriggs (Westerhill) East Dunbartonshire	PAN done EIA required Awaiting application	Apatura	300MW	aprs.scot/bishopbriggs-dc
Haspielaw (near Hamilton) South Lanarkshire	PAN done EIA required Awaiting application	Apatura	unknown	aprs.scot/hamilton-dc
Ochiltree East Ayrshire	PAN done EIA required Awaiting application	Apatura	200MW	aprs.scot/ochiltree-dc
Duns/Longformacus Scottish Borders	PAN done EIA required Awaiting application	Sunlaws Development company (Roxburghe Estate)	225MW	aprs.scot/duns-dc
Dunbar East Lothian	PAN done EIA required Awaiting application	Thistle Sands Data Limited	unknown (very large – 62.5 hectares)	aprs.scot/dunbar-dc

Chapelhall North Lanarkshire	PAN done EIA not required Awaiting application	HFD Renewables NL (DataVita is HFD's data centre division)	AI growth zone (500MW over 2 sites) DV4 100-125MW (no EIA required)	aprs.scot/chapelhall-ai-growth-zone/
Chapelhall North Lanarkshire	PAN done EIA scoping yet to be submitted	HFD Renewables NL (DataVita is HFD's data centre division)	AI growth zone (500MW over 2 sites) DV6 – size unknown	aprs.scot/chapelhall-ai-growth-zone/
Dunoon Argyll	Planning application granted for a much smaller data centre development	Argyll Data Development Ltd. and SambaNova	100-600MW (scaling to 2000MW)	aprs.scot/argyll-dc
Irvine North Ayrshire	not in planning or pre-planning yet.	AI Pathfinder	1000MW	
Cockenzie East Lothian	not in planning or pre-planning yet	East Lothian Council with Sustainable Development Capital LLP	unknown	aprs.scot/cockenzie/
Chapelcross Dumfries and Galloway	not in planning or pre-planning yet	Nuclear Decommissioning Authority & CX Power	1000MW	aprs.scot/chapelcross-data-centre/
Greenock IBM site Inverclyde	not in planning or pre-planning yet	Slate Islands Development	unknown	https://aprs.scot/greenock-ibm-data-centre/
Aberdeen, Blackdog	not in planning or pre-planning yet	Ashfield Land and TechRE	'multi-gigawatt' starting at 600MW	https://aprs.scot/aberdan-blackdog/

Updates (July/ August 2026):

[Bloomberg reported](#) that the Irvine AI Pathfinder is likely not happening due to difficulties with the parent company

The Scottish Government Reporter on the Edinburgh Gyle 213MW data centre application has (30 July) decided that the developers will now [need to submit an EIA](#) for the appeal to progress

[The Herald](#) reported that the Argyll Data Centre is 'stalled if not halted'