



**Scotland's
countryside
charity**

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Ivan McKee
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Scottish Government
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Dear Minister,

RE: Scottish Government policy on data centres and the planning system

Written questions answered in the Parliament on 28 October 2025 asked, among other things, for clarification about the status of 'green' data centres in National Development 12 of NPF4, and the results were concerning.

In summary, the answer to the S6W-41362 indicated that all 'green data centres' were to be considered part of National Development 12. The same Question asked what criteria are used to determine whether a data centre qualifies as a 'green data centre' under NPF4. The answer was that it 'will be for the planning authority to interpret and apply NPF4 according to the circumstances of each individual case'.

We believe that there will be serious unintended consequences of this policy until a strict definition of a green data centre is established, combined with an overall limit to the amount of energy that Scotland intends to divert to data centres.

We have looked at data centres in development around Scotland and have seen that, in many planning application documents, or pre-application consultations, they are describing themselves as 'green' data centres. This can range from claiming to be green because they have solar panels on the roof to claiming the fact they use grid electricity in Scotland makes them green, some mention using waste heat in heat networks.

The data centres we are looking at in detail are hyperscale data centres, those with a capacity¹ of over 100 MW. We are aware of at least 3900 MW in planning portals and two developments, a total of 550 MW, which are conducting pre-application consultation, although we haven't found any planning documents associated with them. This gives an estimated capacity of 4450 - 4950 MW that is already in planning or likely to enter the planning system in the next months. See table below for information.

¹ Following text from [Scottish Enterprise](#) document: "Datacentres are highly energy intensive and measured in megawatts (MW) instead of footprint size on the basis they will always run out of power before space. A MegaWatt is the standard unit used to measure electrical power in the International System of Units (SI) and is equivalent to 1,000 kilowatts and is abbreviated as MW."

These proposed developments only include two that are on the Scottish Government shortlist of applications. If development proposals for the other shortlisted sites reach planning, they will add a lot more electricity demand. For example, the i3 Irvine site alone is planned to be 1000MW.

The largest data centre currently operating in the UK, according to our information, is VIRTUS London5 in Slough at 90 MW (information from June 2025) but the scale of data centres proposed to be based in Scotland dwarfs that. The ones in planning portals are up to 600 MW and the Irvine data centre would be 1GW. With Torness power station producing 1.2 GW, one data centre could use nearly all the energy from the nuclear power station, which is due to close at the end of this decade. Data centres need constant energy, and cannot dial up and down according to renewable production. Hyperscale data centres need onsite emergency generation, which will likely be gas turbine generators for any built in Scotland.

We are concerned about the capacity of Scotland's grid to accommodate these data centres and the implications for our climate targets. At present peak electricity demand in Scotland, according to NESO² is just over 4,000 MW. Which means that the applications already in the Planning system, not including any additional that come forward from the SG shortlist, would require more energy capacity than Scotland's peak electricity demand.

We 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', including guidance on alignment with net zero, and which informs developers that they are to include information regarding the capacity and electricity consumption of any proposed data centres clearly in application and pre-application documents;
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. This could be done by adding data centres to Schedule 1 of those Regulations. EIAs must ensure that a thorough

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<https://www.neso.energy/publications/electricity-ten-year-statement-etys/electricity-transmission-network-requirements/scottish-boundaries>

analysis is carried out of the impact of the energy and water use of data centres, before a decision is made on whether to grant planning permission.

Hyperscale data centres need backup power on site, and these are likely to be gas turbines, to fire up in the case that the electricity supply goes down. The impact of backup generation from data centres needs to be examined in the context of our net zero targets.

We would like to meet with you to discuss these concerns and a way forward to deal with the situation.

Yours sincerely,

Dr Kat Jones,
Director, APRS

Dr Ben Christman
Legal Director, ERCS

Table of Hyperscale Data Centres in the Scottish Planning System

Site Name	Location (Local Authority)	Developer	Capacity MW	Stage of planning
Ravenscraig (west)	North Lanarkshire	Apatura	550	EIA screening
Apatura Borders	Borders	Apatura	300	EIA screening
Data vita Fortis North Lanarkshire (extension)	North Lanarkshire	data Vita	40	Planning application
Apatura Drumshangie Greengairs	North Lanarkshire	Apatura	500	Pre-Planning
Killeen AI Growth centre/ Sovereign iCloud Argyll	Argyll	Argyll Development and SambaNova	100-600	Planning permission for building granted but not clear whether the data centre has permission or funding.
Cato Data Centre Campus (Auchertool)	Fife	ILI Group	600	EIA Screening
Rufus Data Centre Campus (ILI Group)	East Ayrshire	ILI Group	540	pre-application
Aurelius Data Centre Campus (ILI Group)	North Lanarkshire	ILI Group	400	pre-application
South Gyle	Edinburgh	Shelborn Drummond	212.42	Planning application

		Ltd		
Wester Hermiston	Edinburgh	Apatura	200	EIA screening
Free Port	West Lothian	Apatura	250	pre-application consultation
Westerhill	East Dumbartonshire	Apatura	300	pre-application consultation
Haspielaw	South Lanarkshire	Apatura	not listed	EIA screening
Ochiltree (Creoch)	East Ayrshire	Apatura	200	EIA screening

Total Capacity: 4092 plus between 100 & 600 MW for the Argyll Centre and added 350 MW average size for the one that doesn't have a listed capacity.

Therefore total capacity of data centres in the Scottish Planning system and in pre-planning is between 4450 MW and 4950 MW.

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