



Scotland's climate coalition

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John Swinney MSP
First Minister
Scottish Government
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(sent by email to firstminister@gov.scot)

Dear First Minister,

We wish to set out our concerns about an unexpected development that has the potential to blow any chance of meeting our future carbon budgets: corporate pressure for the construction of new hyperscale data centres in Scotland, each requiring in excess of 200MW to operate. Alarming, the draft Climate Change Plan does not factor in the vast energy demands of the data centres currently progressing through the planning process and contains no information on how the impact of new hyperscale data centres will be managed and mitigated, merely describing them as a “clean energy-intensive” industry.

The first of these projects to be decided upon was rejected earlier this month by City of Edinburgh Council. The data centre, proposed for the Gyle, would have a power demand of 213MW of electricity, which is the equivalent of almost a quarter of a million homes.

One of the largest data centres is the one proposed for Irvine and this would require 1,000MW – the equivalent of 25% of Scotland's peak electricity demand. Across Scotland, data centres requiring more than 4,500MW of power are in the planning pipeline already.

This enormous additional pressure on the grid could, as the US experience shows, lead to significant increases to domestic electricity bills during the ongoing cost of living crisis and could, without careful management, result in blackouts.

These hyperscale projects are being developed to support the vast energy needs of AI and training the large language models of large US tech companies. As such, they are entirely unlike the existing data centres in Scotland, those which provide vital back end support for the Scottish public sector, for businesses and for the public. The 11 data centres already operational in Scotland in June 2024 had a total capacity of just 10MW, according to the Scottish Government's own figures.

Compounding the potential climate impacts, hyperscale data centres require 24/7 connections and backup generation which is currently provided by gas or diesel generators. The proposals for the hyperscale data centre at the Gyle would have relied on diesel for backup, and when in operation would have polluted as much per hour as more than 100,000 cars idling.

These shortcomings are not even offset by substantial job creation. TechUK, looking at information about UK hyperscale sites, estimated employment levels of between 20 and 88 FTE roles per site. As the [Wall Street Journal reported](#), “data centers have rightly earned a dismal reputation of creating the

lowest number of jobs per square foot in their facilities.” As such, data centres do not provide a route to high-quality, secure and sustainable new jobs that must be at the heart of a just transition in Scotland.

Scotland’s National Planning Framework 4 references “green data centres” as part of “National Development 12, Digital Fibre Network”. However, crucially, the meaning of “green” appears not to be assessed in any way, and many data centre developers are not even being required to produce Environmental Impact Assessments. We cannot enable energy-intensive data centres to green-wash their damaging environmental impacts through the inadequacy of national and local planning terminology and guidance.

The answer to [one written Parliamentary Question](#) implies that a “green data centre” is one which uses renewable resources, but – as explored above – this ignores the requirement for back-up generation, often using fossil fuels. A separate Parliamentary answer indicates that Scottish Ministers have no centrally maintained dataset to monitor applications for data centres coming through the planning process (see [S6W-42878](#), answered earlier this year).

While we acknowledge the potential of AI to bring societal benefits, it is essential that a proactive and precautionary approach is adopted. Crucially, the significant energy demands of data centres, and the knock-on consequences for Scotland’s climate ambitions must be carefully scrutinised and managed.

We are therefore calling for an immediate moratorium on hyperscale data centres in Scotland while the government does the following:

1. Publish an analysis of the impact of hyperscale data centres on Scotland’s power grid and route to achieving net zero by 2045
2. Publish a draft planning circular or planning guidance for consultation to stringently define what constitutes a ‘green data centre’
3. Make Environmental Impact Assessments (EIAs) mandatory for all planning applications for data centres

We recognise this is a rapidly emerging area and that this is creating significant challenges to our collective understanding of the climate and wider implications. However, our members and the public are greatly concerned about the impacts of hyperscale data centres on the climate, energy bills, and local communities. We urge you to consider including the points raised above in your manifesto and would be grateful for a meeting with you to discuss these important issues. I have also shared this letter with the other party leaders at Holyrood.

Yours sincerely,



Mike Robinson
Chair, Stop Climate Chaos Scotland