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Gillian Mackay MSP and Ross Greer MSP
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(sent by email to Gillian.Mackay.MSP@parliament.scot and Ross.Greer.MSP@parliament.scot)

Dear Gillian and Ross,

We wish to set out our concerns about an unexpected development that would blow any chance of meeting our future carbon budgets – corporate pressure for new hyperscale data centres in Scotland, each requiring in excess of 200MW to operate. Alarmingly, the draft Climate Change Plan does not factor in their vast energy demands 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, proposed for Irvine, would require 1,000MW – the equivalent of 25% of Scotland's peak electricity demand, and across Scotland more than 4,500MW of data centres 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, 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 June 2024 had a total capacity of just 10MW, according to the Scottish Government's own figures.

Compounding the climate impacts, hyperscale data centres require 24/7 connections and backup generation which is 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 PQ implies that a "green data centre" is one which uses renewable resources that could and should be used for decarbonising existing processes. And Scottish ministers are not monitoring applications coming through the planning process (see S6W-42878, asked by your colleague Ariane Burgess MSP and 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. A copy of this letter has been sent to the First Minister and to the leaders of the other political parties at Holyrood.

Yours sincerely,

Mike Robinson
Chair, Stop Climate Chaos Scotland