



SCCS Proposal for a Moratorium on 50MW+ data centres

From: Stop Climate Chaos Scotland, including Action to Protect Rural Scotland (APRS), Environmental Rights Centre for Scotland, Friends of the Earth Scotland, Global Justice Now

[Stop Climate Chaos Scotland](#) is a coalition of over 70 civil society organisations working together to secure fast and fair policies to tackle climate change and its impacts. We have severe concerns about the rush to develop hyperscale data centres in Scotland.

The energy demand from all of the proposed applications would require between 4,700MW and 5,200MW of electricity. This is more than Scotland's entire peak winter demand. This calls into question our country's ability to electrify home heating, transport and industry, as required by Scotland's Climate Change Plan, alongside powering these data centres.

Meeting Scotland's carbon budgets would be directly undermined by the approval of any project of this scale, yet the impact of hyperscale data centres is not included in the Climate Plan which sets out Scotland's pathway to net zero by 2045. Hyperscale data centres' constant and very high energy demands would make it almost impossible to decarbonise our grid. As they need to run 24/7, they usually require diesel or gas backup generators. The proposed development at South Gyle, Edinburgh would require backup diesel generation equivalent to over 100,000 diesel cars, with severe impacts on emissions and air quality.

We welcome the Scottish Government's recent step to require planning authorities to notify Scottish Ministers of new data centre applications. However, more is required to ensure that the climate and environmental impacts are fully assessed.

As Scotland's Climate Coalition, we urge you to consider the following proposal for a moratorium and the measures that must be put in place before it is reviewed.

The Scottish Government must create a moratorium on data centre developments in Scotland which:

- Is effective immediately
- Applies to applications in every stage of the planning system. Developments that have already submitted plans to local planning authorities should be called in by the Scottish Government before the decision is made, and paused until the conditions to lift the moratorium are met.
- Applies to all data centre applications of 50MW and above, including within AI Growth Zones
- Is fully upheld by the Scottish Government and only reviewed once the below conditions are met.

Conditions that should be met before the moratorium is reviewed and before any 50MW or above data centres are approved:

- Scottish Government has published an **independent analysis of the impact of hyperscale data centres on Scotland's grid and route to net zero**. The Chair of this process must be independent, objective and hold expertise on the environmental and social concerns around data centres. The analysis must:
 - List all of the data centre developments being considered in Scotland, including their location, expected capacity, and developers. This includes all applications at the planning, pre-planning, scoping or screening stage, plus any notified to Councils.
 - Assess the impact of hyperscale data centres (individually and cumulatively) on Scotland's ability to meet its legally set net zero targets and Scotland's 5-yearly carbon budgets.
 - Assess the demand on the National Grid created by hyperscale data centres (individually and cumulatively) and how this will be managed alongside plans for electrifying and decarbonising heating, transport and industry.
 - Assess the additional energy infrastructure (beyond that already required for net zero) that would be required in Scotland to power all hyperscale data centres under consideration, and the cumulative environmental, social and economic impacts this would bring.
- Scottish Government has **articulated the purposes for which Scotland needs 50MW+ data centres** (what they will be used for and how this enhances public good).
- Scottish Government has produced **a clear definition of a green data centre** and communicated this to local authorities via statutory planning guidance. **This should align with the** lifecycle greenhouse gas assessment in NPF4 (National Development 12) and only apply to small data centres to be used in support of fibre broadband.
- Scottish Government has produced **planning guidance for data centres of 50MW and above**. This should address the current problem of many applications for in-principle permission providing insufficient detail. Guidance should encourage planning authorities to use their broad power to request further documents, materials or evidence which they consider are required to enable them handle hyperscale data centre applications for permission in principle in a more informed way, and to make the process more rigorous.
- Scottish Government immediately requires all data centre plans of 50MW and above to **complete a full EIA at the pre-planning stage**, using a direction under the existing EIA regulations. This should be an interim step until data centres of 50MW+ have been added to Schedule 1 of the Environmental Impact Assessment Regulations. The EIAs must include energy requirements (including requirements for back-up generation), water requirements, heat island impacts, plans for waste heat disposal, and the impacts on the climate, health and material/circular economy use.
- Scottish Government must **guarantee that the costs of supplying electricity to data centres will not fall onto the Scottish public and other industries**. This should cover both the cost of connection, and a guarantee that data centres' electricity costs are not subsidised more than other consumers' costs.

We are also concerned about the UK Government's influence on applications in AI Growth Zones, and believe that the determining power should remain with the relevant local authority.