



Hannah Mary Goodlad MSP  
Minister for Public Finance  
The Scottish Government  
St Andrew's House  
Edinburgh

cc: Gillian Martin MSP, Cabinet Secretary for Climate Action and Rural Affairs

29 September 2026

Dear Minister Goodlad,

### **New developments regarding hyperscale data centres**

[Stop Climate Chaos Scotland](#), a coalition of over 70 civil society organisations, wants to thank you for the steps that the Scottish Government has recently taken to ensure a more strategic response to the recent rush to develop hyperscale data centres in Scotland. In particular, the requirement for all proposed data centres over 50MW to submit an EIA is very welcome. We also welcome the requirement for local authorities to notify the Scottish Government of these developments; the commitment to produce national planning guidance; and the support for the principle that “no decisions on planning or consenting in relation to such applications should be made until this has been completed.”

However, we are seeking clarity on the current situation, and would like to set out our position on other conditions that should be met before any planning applications for data centres over 50MW are determined.

On the current situation: how will the Scottish Government ensure that no applications for such data centres are determined before the national planning guidance is in place? The application for a hyperscale data centre in Larbert is due to be determined before then, on 4th October, and more are likely to come through the planning system soon. What is the mechanism for local authorities to put the applications on hold? The pause before determination appears to rely on a voluntary agreement between the developer and the Council. **The Scottish Government should clarify that no application should be determined until the national planning guidance is published. This should be stated clearly and publicly, so that all stakeholders understand the current situation.**

We would also appreciate your confirmation in writing that the new [planning direction](#) requiring EIAs for data centres over 50MW applies to new *and existing* applications. While this is what you stated in the Parliamentary debate, the Direction itself only refers to new applications, and we are therefore seeking assurance that all applications will be covered.



Our coalition is still deeply concerned about the sustainability of hyperscale data centres and the impact they would have on Scotland's ability to decarbonise and meet its legally binding carbon budgets and net zero target. This issue goes beyond planning; it is a matter of national significance, about how we use our land and our renewable electricity (our power), and who benefits. Data centres did not feature in manifestos for the recent election; they were not debated at hustings; and do not feature in the Climate Change Plan. There is a need for a national conversation around this, underpinned by a formal consultation on Scotland's position on AI data centres.

Starting during this pause on determining applications, we urge the Scottish Government to undertake the following items of work:

- **Conduct a public consultation on AI data centres** (those over 50MW). The consultation should be supported by a dedicated website with user-friendly information on hyperscale data centres and discussion tool-kits to help communities and other groups participate in the consultation. The consultation paper should articulate the purposes for which Scotland needs any 50MW+ data centres and how they will enhance the public good, and should ask the public for their views on this. It should also set out the Scottish Government's position on who should pay for additional grid upgrades that are needed to power data centres, and whether or not data centres' electricity costs should be subsidised.
- **Commission an independent analysis of the impact of hyperscale data centres on Scotland's grid and route to net zero.** This should inform the consultation paper. 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 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 that have a grid connection offer (but are not in planning yet) or have been notified to Councils.
  - Assess the impact of hyperscale data centres (individually and cumulatively) on Scotland's ability to meet its legally set net zero target 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 that would be required to power all hyperscale data centres under consideration, and the cumulative environmental, social and economic impacts this would bring. This should include understanding the demand of material impacts in supply chains, to align with the requirements of the Scottish Government's Circular Economy Strategy.
- **Produce a clear definition of a green data centre** and communicate this to local authorities via statutory planning guidance. This should align with the lifecycle greenhouse gas assessment in NPF4 (National Development 12) and, crucially, only apply to small data centres to be used in support of fibre broadband. The term 'green



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data centre' in NPF4 only appears in relation to the fibre broadband rollout, which is unrelated to the hyperscale data centres being proposed.

- Require any data centres over 50MW to report water and energy usage regularly and transparently, including discharge of pollutants (eg refrigerants, waste heat, exhaust gases and PFAS 'forever chemicals').
- Clarify that the determining power for data centre applications will remain with local authorities, even within AI Growth Zones designated by the UK Government.

Finally, we would expect that the national planning guidance which the Scottish Government produces will encourage data centre developers to submit *full* planning applications. Currently, many applications for in-principle permission provide insufficient detail. Local planning authorities should be encouraged to use their power to request further information from applicants in order to determine applications, especially if Planning Permission in Principle applications continue to be submitted. The planning guidance should speak to the effective use of planning conditions to control environmental harms and negative impacts on community health and wellbeing, and how these will be monitored and enforced, as well as the delivery of local and national community benefits (e.g. contributions to the ScotWind Wealth Fund). Our coalition would be happy to contribute further recommendations to the development of this guidance through any expert advisory groups or other appropriate channels.

Publicly, we will be calling for a national conversation and a formal public consultation on hyperscale data centres, before any are approved.

We look forward to your response.

Sincerely,

Stop Climate Chaos Scotland  
Global Justice Now Scotland  
Action to Protect Rural Scotland  
Environmental Rights Centre for Scotland  
Scottish Communities Climate Action Network (SCCAN)  
Edinburgh Climate Action Network (ECCAN)  
Scottish Wildlife Trust  
People's Health Movement Scotland  
Scottish Women's Budget Group  
Friends of the Earth Scotland  
Wellbeing Economy Alliance (WEAll) Scotland  
Justice & Peace Scotland  
Quakers in Scotland  
Parents For Future Scotland