Hyperscale Data Centres in Scotland
LINK Position Paper
November 2026

Key points:

- The proposed development of hyperscale AI data centres raises serious questions about Scotland's climate commitments, energy system, nature and communities.
- No decisions should be made until the environmental and social impacts are properly understood and effective safeguards are in place.
- The Scottish Government should commission an independent assessment, consult the public and establish clear, enforceable standards before decisions are made.
- Data centre development must not undermine Scotland's legal climate commitments or nature recovery objectives.

What are data centres and why does this matter?

Data centres house the computer servers used to store and process digital information. This paper focuses on proposed hyperscale AI data centres, rather than smaller data centres supporting businesses, public services, cloud computing and research. There currently is no agreed definition of a hyperscale data centre, although the Scottish Government has introduced a 50MW capacity threshold for Environmental Impact Assessment (EIA) purposes.

The energy demand of proposed hyperscale AI data centres in Scotland range from hundreds of megawatts to over 1,000MW. APRS estimates that around 7,300MW of capacity is currently represented in planning portals[1]. This is separate from a larger capacity figures (8.7GW) reported for projects in the electricity grid connection queue[2]. For context, Scotland's winter peak electricity demand is just over 4,000MW.[3]

The scale of these proposals raises significant questions about electricity demand, greenhouse gas emissions, backup generation, land use, biodiversity, pollution and waste. Associated grid connections and other infrastructure could create further environmental impacts.

Any claimed benefits must be considered alongside these impacts, including the implications for communities, public infrastructure and Scotland's ability to meet its climate and nature commitments.

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[1] Data Centre Map - Action to Protect Rural Scotland
[2] Scotland's hidden pipeline of 'phantom' AI data centres | The National
[3] Data Centre calculator - Action to Protect Rural Scotland

LINK's position

LINK believes no planning decisions should be made on hyperscale AI data centres until their impacts have been independently assessed and effective safeguards are in place.

Scotland's statutory commitment to reach net zero greenhouse gas emissions by 2045 must be central to decisions. AI Data centres are not considered in Scotland's Climate change Plan. Data centre development should also be consistent with Scotland's nature recovery objectives and avoid unacceptable harm to habitats, soils, peatlands and landscapes.

Communities must have meaningful opportunities to understand and influence proposals that could significantly affect where they live. Developers should demonstrate the need for and benefits of proposed developments, alongside their likely environmental and social impacts.

What needs to happen?

1. **Extend the pause on decisions**

In September 2026, the Scottish Parliament voted for a motion calling for no planning or consenting decisions on hyperscale data centre applications until national planning guidance is completed.[4] The Scottish Government also voted for the amended motion. The Scottish Government must now make its position clear in policy and to local authorities, ensuring that the agreed pause is reflected in how applications are handled.

2. **An independent assessment**

The Scottish Government should commission an independent assessment of the cumulative impacts of proposed data centres. This should examine energy demand, emissions, grid capacity, backup generation, biodiversity, land use, pollution, including PFAS, waste and the impacts of associated infrastructure. It should also assess claimed economic benefits, including jobs, against the use of resources and public infrastructure.

3. **Public consultation**

A national public consultation on hyperscale AI data centres is needed before decisions are made about their future development in Scotland. Communities should have accessible information and meaningful opportunities to shape the policy framework, alongside engagement with environmental organisations and other affected interests.

4. **Strong environmental safeguards**

[4] Hyperscale Data Centres: Amendment 3

The Scottish Government should establish clear, enforceable standards for data centre development. These should cover climate impacts, energy demand, backup generation, biodiversity, pollution, water usage, waste and associated infrastructure.

The requirement for EIA for new data centres over 50MW is welcome in principle, but there is a risk that developers could split projects into smaller phases to avoid the threshold. All proposed data centres should report their full planned power capacity, and assessments must consider cumulative impacts across all developments. EIA alone is not enough: decisions must also be guided by clear environmental limits and safeguards.

5. **A meaningful definition of 'green data centre'**

NPF4's reference to 'green data centres' was intended to cover smaller facilities supporting digital connectivity, not the large-scale hyperscale AI data centres now being proposed. This is reflected in the Scottish Government's own greenhouse gas assessment, which concluded that the policy would have a negligible impact on climate targets[5]. That assessment did not consider the scale or energy demands of today's proposed hyperscale developments.

The Scottish Government should clarify that hyperscale AI data centres are not covered by this policy and establish a clear definition of 'green data centre' based on the full environmental impact of a development. Renewable electricity alone should not be enough to qualify.

Useful resources

APRS - Data Centre Map: Tracks proposed data centres across Scotland, including their scale and planning status.

APRS - Hyperscale data centres: Useful background on the scale of proposed facilities and their energy requirements.

Stop Climate Chaos Scotland - Hyperscale data centres: Overview of the recent parliamentary debate and current policy context.

Scottish Government - EIA Direction: Official guidance on the new EIA requirement for data centres over 50MW.

[5] National Planning Framework 4 - lifecycle greenhouse gas emissions: assessment findings

This response is supported by:

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Scottish Environment LINK is the forum for Scotland's voluntary environment community, with over 50 member bodies representing a broad spectrum of environmental interests with the common goal of contributing to a more environmentally sustainable society.

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