

Data centres: the case for a moratorium

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Summary

- There are over 20 hyperscale data centres currently being planned in Scotland. The massive scale of these projects means that they would have devastating implications for people who live nearby and require huge amounts of energy and materials. As they stand, these plans are undemocratic and unsustainable.
- The rapid growth in data centres in Scotland is being driven by US tech giants. Scotland doesn't need so many data centres and any that are built must be for the good of the people of Scotland, not US tech giant profits.
- The Scottish Government failure to provide a clear policy direction means that many data centres could be rushed through the planning system without proper consideration or allowing the people who will be most affected by them to have their say.
- Two things must happen now. Firstly, **MSPs must call for an immediate, temporary moratorium that covers all large (50 MW+) data centres in every stage of the planning system** until proper safeguards are put in place. Without this, Scotland could end up bearing a disproportional amount of the costs of UK's data centre expansion, without the same level of benefits.
- Secondly, the **Strategic Spatial Energy Plan**, being drafted by NESO, commissioned jointly by the UK, Scottish and Welsh Governments, **must align to existing Scottish commitments on climate and the circular economy.**

Data centres in Scotland

Hyperscale datacentres are any data centres with a capacity over 100MW. None currently exist here but Scotland's surplus renewable energy, mild climate and good grid connections have made it a target for developers. Estimates vary on the number of hyperscale data centres planned in Scotland as there are no official records¹, however, plans for at least 24 hyperscale data centres, that range from 200–1,000MW, are publicly known of.

Everywhere that data centres have been proposed in Scotland, there has been public outcry². Evidence from the US and Ireland, where such developments are more advanced, show significant noise, heat, air pollution impacts on local people and cumulative impacts on the

¹ SPICe briefing (2026) [Data Centres](#)

² APRS (2026) [Data centre list and map](#)

wider population of data centres³. In Ireland, data centres now use a quarter of all electricity, and this has **increased energy bills by €360 per household between 2015 and 2023**⁴.

The huge energy requirements of data centres are a threat to Scotland's legal climate commitments. The Scottish Government's climate change plan sets out how it will meet its emission reduction targets between 2026 and 2040, but it does not mention data centres and their vast energy demands. Many of the proposed data centre projects include back-up generators, which could create a new market for climate wrecking fossil fuels.

Critical minerals: an overlooked risk

A gap in the debate around data centres is their demand for critical minerals, from nickel to cobalt and silver. The Cato data centre at Auchtertool in Fife, would use the same amount of copper as what would be needed for over 1,000 onshore wind turbines⁵. That's enough turbines to generate power for over half of all Scottish homes for a year.

Critical minerals are those materials that are essential for modern economic activity including the energy transition, communications and electric vehicles but have uncertain supply chains. They have rapidly come to dominate global politics, and their use must now be considered carefully by every government. The social and environmental impacts of critical mineral production are extensive and serious, including corporate manslaughter, human trafficking, child labour, destruction of habitats and widespread pollution⁶.

Research from Edinburgh University and Friends of the Earth Scotland found that people across Scotland cared deeply about the international impacts of critical minerals⁷. They recognised that a genuinely better future in Scotland is not possible if it includes being complicit in human rights abuses and environmental damage on a global scale.

The Scottish Government has no critical mineral strategy, and the UK Government policies around critical minerals fails to recognise devolved priorities⁸. UK Government bodies have suggested that over 20% of the UK's forecast capacity could be located in Scotland⁹, meaning Scottish communities would bear the costs of the UK data centre plans.

Scotland's increasing demand for critical minerals goes far beyond our fair share of global supply¹⁰. Reducing demand for data centres means less critical mineral requirements and this automatically makes Scotland's plans more resilient: the less material needed, the easier the plans are to make happen.

Data centres cannot be built without critical minerals. If these plans are allowed to go ahead unchecked, they risk locking Scotland into a deeply unfair and unsustainable future.

³ World Resource Institute [7 Ways Data Centers Affect US Communities](#)

⁴ FOE Ireland (2026) [The cost of data centres](#)

⁵ Calculation based on World Economic Forum (2025) [Metals at scale for AI at scale](#)

⁶ Friends of the Earth Scotland (2023) [Unearthing injustice](#)

⁷ Friends of the Earth Scotland and Edinburgh University (2025) [Communities and transition mineral mining in Scotland](#)

⁸ FOE Scotland, FOE England, Wales and Northern Ireland, Trade justice Movement, London Mining Network and Common Weal (2026) [Aligning UK critical mineral policies with the human rights and environmental priorities of devolved nations](#)

⁹ NESO (2025) [Future Energy Scenarios 2025: Pathways to Net Zero](#)

¹⁰ Based on Green Alliance (2021) [Critical point: securing the raw materials needed for the UK's green transition](#)

A better future is possible, but not if it is driven by big tech

AI offers benefits to society, including medical advances and scientific breakthroughs. However, current plans are driven by US tech giants such as Google, Meta and Microsoft. These companies are pushing data centres growth to power their AI apps, such as ChatGPT and Grok, that create controversial, useless or harmful content from AI slop, racist and sexist content to undemocratic misinformation.

Big tech has not been transparent about how it plans to use data centres¹¹, or their impacts¹². Their power has allowed them to bypass democratic process and regulatory safeguards, twisting the purpose of AI to suit their own aims. Their plans are based on greenwash.

AI has potential to be an important part of a better future for Scotland, but that won't happen with big tech in charge. We need fewer data centres than they want, and the purpose of these data centres must be for public good, not corporate profit. **Only policy makers have the power to push back against these companies and create a national strategy that puts people first.**

National policy failure

The Scottish Government has failed to protect the people from the harms of data centres:

- It's AI strategy is openly supportive of data centre development, with a single page on risks, none of which are considered meaningfully.
- Repeated requests to the Scottish Government to clarify the term 'green data centres', have not yet been addressed¹³, meaning planning authorities requiring direction now have been left without national guidance.
- Despite their climate, health and material impacts, data centres do not automatically qualify for an EIA assessment, representing a failure of the planning system.

The Scottish Government have not provided a clear policy direction, meaning that many data centres could be rushed through the planning system without proper consideration of their impacts or without allowing the people who will be most affected by them to have their say.

Lessons from the Scottish incinerator moratorium

The Scottish moratorium on new waste incinerators was introduced in 2022 but has failed to stop their increase. Since then, four new incinerators have begun to burn waste, emitting carbon emissions, toxic pollution and undermining Scotland's circular economy plans. A loophole in the moratorium meant any projects that already had planning permissions were allowed to continue.

To be effective, **a moratorium must be set immediately and must cover every stage of the planning system.** If such precautions are taken, a moratorium can be a useful first step, but it cannot stop harmful impacts from data centres alone as it does not address the root cause of the problem – the drive to increase AI capacity by big tech.

¹¹ Stand.earth (2026) [Report exposes Big Tech's AI climate hoax](#)

¹² Guardian (2026) [US tech firms successfully lobbied EU to keep datacentre emissions secret](#)

¹³ [Written question and answer: S7W-01318 | Scottish Parliament Website](#)

What needs to happen?

Two things must happen now. Firstly, **MSPs must call for an immediate moratorium that covers all large (50 MW+) data centres in every stage of the planning system until proper safeguards are put in place.** These safeguards should include an amendment to the planning system so that data centres require an EIA assessment and meaningful consultation with communities.

Secondly, the **Strategic Spatial Energy Plan (SSEP)**, being drafted by the National Energy System Operator (NESO – a Britain-wide organisation responsible for planning and delivery of energy infrastructure) and jointly commissioned by the UK, Scottish and Welsh Governments, **must align to existing Scottish commitments on climate and the circular economy.** A draft of this plan is due for consultation in early 2027, with the final version published by the end of that year. Without a moratorium, the findings of the final report may come too late to influence the development of many of the data centres currently being planned in Scotland.

MSPs must call for:

1. An immediate moratorium that covers all large (50 MW+) data centres in every stage of the planning system until proper safeguards are put in place, including mandatory EIA assessments for data centres.
2. The Strategic Spatial Energy Plan being drafted by NESO aligns with existing Scottish legal commitments on climate and the circular economy.
3. Ultimately, that the Scottish Government put the needs of people and nature before corporate profit. This should include a review of its AI strategy and its planning framework which are not fit for purpose. Demand reduction is essential for resilient supply chains.

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