APRS
Augustine United Church
41 George IV Bridge
Edinburgh EH1 1EL
kat@aprs.scot

16 September 2026

Carrie Main (Case Officer)
carrie.Main@inverclyde.gov.uk
dmplanning@inverclyde.gov.uk
Regeneration and Planning
Inverclyde Council
Clyde Square
GREENOCK
PA15 1LY

Dear Ms Main

RE: Objection to Application for Planning Permission in Principle 26/0136/IC, for the erection of a Data Centre (Sui generic use class) with associated road access, car parking , landscaping, drainage and all associated works at Former IBM site, Spango Valley, Inverkip Rd, Greenock

APRS objects to this application and hopes that Inverclyde Council will refuse it. The reasons for the objection are enumerated below but broadly are related to the gaps in relevant information, inadequate detail about potential adverse environmental impacts and lack of support from the development plan. We also raise concerns about the EIA process as it has been applied to this proposal and suggest it should be re-screened and a full environmental report produced to inform decision making.

Planning legislation requires that the determination of a planning application is to be made in accordance with the development plan unless material considerations indicate otherwise. The proposal appears to be contrary to both the Inverclyde Local Development Plan and Scotland's Fourth National Planning Framework (NPF4).

APRS's specific concerns with the proposed development and the current application include:

1. Contradictory information about the proposed development

2. Requirement for a full EIA

3. Lack of relevant information supplied

4. Green House Gas Emissions

5. Noise

6. Air quality

7. Biodiversity

8. Flooding

9. Divergence from the LDP

10. Definition of Green data centres

1. Contradictory information about the proposed development

It is unclear to us exactly what is being proposed in this application as there is seemingly contradictory information in various submitted planning documents. The application is for a data centre and some associated infrastructure on a 32.4 ha site and the same developer says it has plans for a BESS on adjacent land which it plans to seek consent for from the Energy Consents Unit. The Council's screening opinion for the data centre application says the BESS has been screened by the ECU reference ECU00006354 but this is not visible on the ECU portal and neither is an application. So we can't verify the status of the BESS proposal.

This is of concern as various planning documents make contradictory statements about the relationship of the BESS and the data centre. The Inverclyde Council EIA screening opinion page 9 says "the BESS element would provide energy storage infrastructure associated with the wider digital infrastructure development and would operate in conjunction with the electrical infrastructure serving the site". The BESS is referred to as 99MW whereas the data centre (according to an FAQ annex in the PAC report) would be a maximum of 150MW.

It is unclear whether the two developments depend on one another although the data centre application relies on the adjacent BESS for its purported green data centre credentials (reference** and see below).

The Planning Statement in some places (eg para 4.8-4.9) implies that the data centre will not connect to the BESS directly but elsewhere eg para 1.4 of the Planning Statement says it "forms part of a wider overall project comprising a data centre and a co-located BESS". The accompanying Noise Impact Assessment v2, section 4.1 also implies that the two are connected and that this is why (unusually for such a proposed development) "there is no requirement for emergency generators for back up power". The Design and Access statement further states that "together, the developments will create a complementary and resilient facility" but the FAQ annex of the PAC report states "there is potential for the data centre to progress without the BESS and vice versa" and this will only be determined by the final operator.

Either the two proposals are separate, in which case the data centre would require back up generation of some sort which should then be an important aspect of an application to be consider, or the BESS is to supply back up power and therefore the two proposals must form one project. **It seems crucial for there to be clarity on this point, and adequate information about the energy supply and back up before the planning application is determined. There are also implications for the EIA screening given the Raeshaw Farms Ltd v Scottish Ministers ruling earlier this year ([2026] CSIH 10). If the data centre and BESS are interdependent to any degree then that should be properly evaluated before the application is determined.**

The Council apparently expected clearer information to be submitted - the EIA screening opinion states at 1(B) " All elements of the proposal and detailed infrastructure will be confirmed on submission of any application" - but this doesn't appear to be the case.

2. Consider requirement for full EIA

We have several reservations about the EIA screening opinion and the decision, taken in May 2026, not to require a full EIA for the proposed data centre. The first concern is over the Raeshaw Farms Ltd ruling and the open question of whether the data centre application and the BESS should be considered for EIA purposes together (along with related grid connections etc).

Secondly we have concerns about the conclusions drawn in the May 2026 screening opinion and the scant information it appears to have been based on. This screening opinion only became publicly available after APRS requested it was, so we have only recently studied it. The screening opinion seems to make several assumptions about the potential impact of the development based on the applicant's assurances, for example that water use will be managed efficiently. There also seems to have been an assumption that natural assets should be retained and that a number of further surveys and studies will be submitted with the applicant, many of which don't appear on the portal for the current application and so there is no evidence they have been undertaken (eg Environmental Site investigation; water supply impact assessment. Assessment of cumulative effects, including grid connection infrastructure; fire safety management plan??; appropriate visualisations of the proposal). Section 3(H) of the opinion checklist says "we would recommend that a detailed suite of supporting information is required in support of a application for a Data centre at this site to enable full consideration of the developments's environmental impacts and gives a recommended but not inclusive list.

In addition we are puzzled that the current proposal was screened out but the previous planning application for the site consented in 2020 was treated as EIA development. The previous scheme seems to have had a smaller footprint, less vast buildings (all several metres shorter than the data halls), and wouldn't have had the likely impact of 24hour a day 150MW plant running. It seems that several reports submitted after the Screening was undertaken in Spring 2026 have suggested potential significant environmental effects - eg the Air Quality Screening Assessment (July 2026) and Noise Impact Assessment, v2, (August 2026) and the Preliminary Ecological Assessment (that highlighted the risk of nationally important habitats being erased).

However, a key omission from the EIA screening for the data centre is that the proposed energy use of the development is not considered at all, so greenhouse gas emissions and any climate impact of the energy use aren't mentioned in the screening opinion. In the checklist section 1(C), even though the question asks if the proposed development will use energy, this is not addressed at all in the description or assessment of significance. This approach is a stark contrast with the recent Screening Direction associated with the proposed Edinburgh Gyle data centre currently at planning appeal (PPA-230-2794). The DPEA Reporter's Screening direction dated 30 July 2026 explicitly requires the consideration of effects on climate from energy use, saying:-

"Effects on climate arising from energy use – The proposals require a large quantity of energy to operate (estimated at 210MW). This is in addition to energy for the construction of the proposals. This level of energy use has the potential for significant effects on climate and the environment in terms of the sources of this energy and release of greenhouse gases."

The proposed Gyle data centre is said to be maximum 210MW compared with 150MW[1] for Greenock, but even 150MW significantly dwarves Scotland's largest operational data centre. The

[1] Note that this figure doesn't appear in the application's Planning Statement and strangely there is no Energy Statement supplied. We found it in an appendix to the PAC report detailing Frequently Asked Questions and answers.

impacts of this energy use should be carefully considered as part of the decision-making process - but a confirmation of the MW capacity proposed and the energy sources to be used will be required to in order to do so. Given the gravity of the climate crisis and the scale and energy intensive nature of this development it should be considered as EIA development. We appreciate that the information about the maximum MW capacity of the data centre was probably not included in the screening request in April, but that now it has emerged, and hopefully can be confirmed by the applicant, we would hope the development would be re-screened.

[We note that the Scottish Government has today (16/09/26) announced that all data centres over 50MW will now require an EIA so we assume that once the applicant has confirmed the capacity of the proposed development this direction will apply.]

3. Lack of relevant information supplied

In the planning statement at para 4.12 the applicant states that they see the PPP as establishing "the principle of development and key development parameters with the intention of building in sufficient flexibility for the final design and layout to meet market requirements". Those parameters are listed as overall floorspace, maximum height of the development, key principles for site configuration, development areas, access etc and any required set backs from BESS/other receptors.

Of these parameters the maximum height of the buildings is set out in the planning statement as 18m - although other documentation (the Noise Impact Assessment v2) implies there may be a further 2m of plant on the roof of those buildings so it is likely the perceived height of the proposed data halls could be around 20m unless the height limit is clarified to include rooftop plant.

The Planning Statement also specifies the overall floorspace as "anticipated to be c80,000sqm" but isn't clear that this is a maximum parameter. It is not clear what the other "key principles" are although statements about indicative layout and various intense features are mentioned.

There appears to be a lack of definitive information or clear parameters that would help the determination of the application. For instance, doubt is cast on what the maximum floorspace might be in the Planning application form where it is stated that the exact floorspace is "not yet known and will depend on the end user".

Other details that might be relevant to any assessment of a data centre's "green" credentials are also deferred to when there is an end user eg:-

- Cooling and waste heat (opportunities for water-efficient cooling and beneficial reuse of waste heat will be considered at the detailed design stage, where technically and commercially feasible" (Planning statement, NPF4 policy 19)

- "There is currently no plant or machinery data available" (Noise Impact Assessment v2, section 4.1)

- BESS - "whether the BESS is needed will be determined by the final operator" (PAC report)

- "There is a commitment to ensuring that the final building design utilises green technologies and this will be confirmed at AMSC stage" (planning statement)

- “As detailed within the Air Quality Screening Assessment which accompanies the application, the proposed development does not include an on-site combustion plant, flues or other significant operational emission sources” (planning statement).

- “The exact specifics regarding how water consume through the proposed development will be treated and discharged is not yet known” (planning statement LDP policy 39).

- The 150MW maximum energy use is only stated in the FAQ section of the PAC Report, not in the Planning statement or any of the formal application documents and it is unclear if this is the the maximum for the IT load or for the whole development, or indeed if it is the upper limit of the grid connection the applicant claims to have.

We appreciate that this is an application for planning permission in principle, and that some flexibility in design may be required, but the current application appears to leave virtually every parameter and design limit and detail (other than the 18m maximum building height) to a later stage of the planning process. Previous planning permissions in principle granted for this site have, despite assessing much more detailed proposals, contained a large number of planning conditions eg 22/0225/IC had 69 conditions, some fairly detailed (eg on EV charging point details). Given that this current application is for a Green data centre, seemingly relying on NPF4’s inclusion of the phrase under National Development 12, there would be an expectation that any development would be more environmentally friendly than general. It would seem reasonable that any development permitted in line with NPF4, and particularly its requirements on climate and nature, would require a significant number of conditions to ensure the development was acceptable covering the design information/parameters omitted from the applications. These would have to include for example: maximum size, maximum installed IT load in MW, a condition confirming that there will be no standby generators, flues or combustion plant will be installed (as the application states), design PUE, boundary noise limits for day and night, maximum water usage and cooling method, requirement to re-use waste heat, biodiversity conditions, treatment of water courses, use of green building technologies, use of PFAs etc, etc.

4. Green House Gas Emissions

The application is for a large-scale data centre which is likely to have a high energy usage. NPF4 requires decision makers to give “significant weight to the global climate and nature crises” when considering all development proposals (NPF4 Policy 1). NPF4 Policy 2a) requires development proposals to be sited and designed to minimise lifecycle greenhouse gas emissions as far as possible. For this application there appears to be no information about energy use or greenhouse gas emissions. The section on Policy 1 in the Planning Statement (5.10|) gives no information other than an assertion that ‘the proposed development has sought to reduce greenhouse gas emissions as far as possible, including through the co-location of a BESS, which will support wider grid flexibility and the integration of renewable energy generation.’ But omits to mention that there is no certainty of the BESS going ahead. The section on NPF4 Policy 2 also relies on the co-location of the BESS and says it will facilitate the storage of renewable energy. However, there is no indication in the documentation that the BESS, if built at all, would store only renewable energy as there doesn’t seem to be an associated dedicated renewable source. It seems more likely that it would store energy from the grid. But the gaps in information make it impossible to assess.

Green data centres are referenced in NPF4 under National Development 12. Whilst it seems highly unlikely that the current proposal could be considered a green data centre (see section below on GDC definition) given the information provided in the application, but if the local authority chooses to

consider it a green data centre then how National developments are expected to address lifetime greenhouse gas emissions should be considered.

Meeting emission reduction targets is one of six statutory outcomes for NPF4, as introduced by the Planning (Scotland) Act 2019. The Act also introduced a requirement for the NPF to include an assessment of the likely impact of each proposed national development's lifecycle greenhouse gas emissions on achieving national greenhouse gas emission reduction targets.

The full relevant paragraph from NPF4 (page 112), National Development 12 under "Lifecycle greenhouses emissions assessment" says "depending on the nature of the projects taken forward and considering both direct and indirect effects, the lifecycle greenhouse gas emissions assessment concludes this development will likely have an overall negligible impact on achieving greenhouse gas emissions reduction targets". However, the major part of the National Development is clearly not data centres (let alone hyperscale data centres) but "the installation of new and /or upgraded broadband cabling on land and sub-sea for fixed line and mobile networks".

The assessment methodology compares projected lifecycle GHG emissions, which covers construction, operation over the development's lifetime, and decommissioning, against a baseline representing the existing situation [Scottish Government, National Planning Framework 4 - lifecycle greenhouse gas emissions: Annex B: Assessment Methodology, 8 November 2022]. The Digital Fibre Network (ie National Development 12) as a whole has been classed as likely having "an overall negligible impact on achieving national greenhouse gas emissions reduction targets".

The LGGEA is based on work commissioned by the Scottish Government from LUC, and looks at the whole of National Development 12 together. The drive behind it is said to be "to deliver enhanced digital connectivity providing high speed broadband or equivalent mobile service, prioritising those areas with weaker networks across Scotland". It is made clear that this will require a roll out of masts and cables and towers, but there is only an assumption of "potential creation of green data centres" and scant mention of what the likely impacts would be from data centres. The most detailed assessment information in the report (Annex B, table A, page 118) only says that the likely increased number of devices "may lead to overall increased energy demand. This will also increase energy demand from data centres, although for a relatively small number of users overall." This wording suggests that data centres were treated only as an indirect source of increased electricity demand (stemming from the wider digital fibre network) rather than as a type of development subject to the direct lifecycle assessment. In other words, the reference appears to address additional energy demand caused by the rest of the proposed network, not the total energy use or lifecycle impacts of major data centre developments themselves. There seems to be absolutely no discussion of back up power sources for data centres and certainly no expectation for them to use fossil fuels on site.

The exclusion of data centres as contributors to direct effects represents a significant gap. The national scale energy demand and associated carbon emissions from data centres, which are clearly substantial, do not appear to have been accounted for. This is likely due to the fact that the LUC Report dates from October 2022 and NPF4 was published in February 2023, before the recent rapid rise in data centre demand and particularly the development of AI hyperscale data centre demand. At that time the impacts of data centres were considered marginal and the scale of subsequent growth was not anticipated. It is impossible not to conclude that the huge energy requirements of hyperscale data centres such as those being proposed now were not considered adequately enough for the NPF4 LGGEA to have any useful standing when considering a planning application of this type.

The Scottish Government's NPF4 Planning Guidance on Policy 2 - Climate Mitigation and Adaption (June 2025) states at paragraph 1.4 that for National Developments, where individual development proposals come forward, the NPF4 LGGEA assessment can help inform further, more

detailed consideration at project level[2]. This emphasises that the assessment included in NPF4 is **not adequate to inform a planning decision** and that even if the proposed development was to be considered 'a national development' detailed consideration of lifetime greenhouse gas emission and climate impacts of the development need to be clearly stated and scrutinised.

5. Noise

The applicant's Noise Impact Assessment v2, Executive Summary and Conclusions contains predictions of **potential major adverse impacts** at local receptors at the top of Flatterton road. These include "The rated noise from the Data Centre facility is predicted to exceed background at NSRs 2 - 5 by up to 14 dB during the day, which typically equates to Major Adverse Impact in accordance with BS 4142." (Noise Impact Assessment v2, section 5.2). Section 6 of the same assessment highlights that the impacts will be worse in combination with the proposed BESS even if the latter is mitigated. The nearest houses are around 160m away.

However, there are clear gaps in the information provided that will determine likely noise impacts such as the lack of plant or machinery data being available and the noise assessment modelling therefore being based on another smaller data centre and being scaled up. There also appears to be an expectation that the plant will be on the roofs of the data halls and could add another 2m to the perceived height of the buildings.

We note that in 2020, in considering a separate development the same consultancy agreed a numerical criterion with Inverclyde Council's Environmental Health Officer:"The following assessment criterion was agreed through consultation, for the assessment of industrial /commercial noise: A maximum exceedance of rating sound level over background sound level of +5 dB." (2020 EIA Report, Chapter 10, paragraph 10.43). As the proposed scheme in 2020 was predicted to exceed the limit the Council required a 6 meter acoustic wall to be included. Based on the assumptions around the data centre scheme the exceedance is likely to be higher and the source of noise may at least in part be at 18-20m height.

The Council needs to address the risk of major adverse noise impacts by requiring a boundary noise limit to be fixed by condition. Otherwise, as per **NPF4 policy 23 e)** the development proposal should not be supported due to it raising unacceptable noise issues.

6. Air Quality

The applicant's own air quality screening assessment concludes that air quality is considered to be a **material concern** and a full Air Quality Assessment should be required at detailed planning stage. We would note that the consultant's assessment was based on the assurance that the development will involve **no on-site combustion plant, flues or other significant emission sources**. A data centre of the proposed size with no back up generators is unusual, and if the design changed to include diesel of HVO fuelled generators the impact on air quality would be even more negative. This is an important point that has ramifications beyond air quality too, so we suggest that the exclusion of back up generators should be confirmed before the proposal proceeds and then secured by condition.

[2] A copy of the research informing this assessment can be obtained from the Scottish Government by emailing chief.planner@gov.scot

7. Biodiversity

We are concerned that the proposal does not comply with NPF4 policy 3. The applicant has submitted a Preliminary Ecological Assessment which highlights the need for further surveys and makes recommendations. It appears that not all of the surveys have been conducted and some recommendations have been ignored (eg that the nationally important habitats should be retained along with habitats of county importance). There are clear ecological connections with the Renfrewshire heights SPA and SSSI, which don't appear to be addressed. Also raised are concerns that many of the on site habitats are similar to those in three nearby LNCS and could be useful ecological stepping stones as part of a nature network so that any significant habitat loss would negatively impact connectivity overall. We see that a Biodiversity Enhancement Plan has belatedly been published which confirms that the national important purple moor grass and rush pasture priority habitat will be completely erased by the proposed development. It doesn't seem to address many of the concerns raised in the PEA. The applicant's Planning statement highlights the habitat losses under the section on Policy 4 Natural Places (but doesn't address them under the section on Policy 3). The policy 4 section states that "To prevent any significant adverse impact on existing habitat within the site as detailed above, it is proposed for nationally important and county habitats to be retained with appropriate buffers from development." As far as we can tell this is not what the proposed development intends.

NPF4 Policy 3 says that major development proposals will only be supported where it can be demonstrated that the proposal will conserve, restore and enhance biodiversity, including nature networks so that they are in a demonstrably better state than without intervention. There are then 5 criteria that require to be met including full mitigation of potential negative effects in line with the mitigation hierarchy. We hope that the carrying out of a full EIA will address some of the concerns raised and ensure that NPF4 Policy 3 and 4 are adhered to.

8. Flood risk and NPF4 Policy 22

The applicant's Flood Risk Assessment section 9 highlights that the "proposed development is predicted to cause localised increases in peak flood depths and channelising of floodwater flows around and between proposed buildings". Th site is also shown on SEPA flood risk maps as having a high likelihood of river flooding from the Spango burn and parts of it are at risk of surface water flooding. We think it is unlikely that the proposal in its current form meets the exception in Policy 22 for development proposals at risk of flooding or in a flood risk area. It is debatable whether the proposed data centre is "essential infrastructure". According to the definition in NPF4 Annex F the proposal would have to be considered digital communications infrastructure which is not clear cut especially given the end user of the data centre is not known. The other requirement for an exception under 22a) i) is that the location "is required for operational reasons" and this does not seem to be addressed at all in the planning statement.

9. Divergence from the LDP

Inverclyde has an adopted LDP from 2019, and the Council subsequently published a Proposed Plan in 2021 which didn't proceed, following the introduction of NPF4, but which remains a material consideration. The site sits in the Spango Valley Priority Place and the LDP's policy 3 says "The Council will support comprehensive redevelopment proposals for the Priority Places where these are in line with the preferred strategy set out in Schedule 2 and the development frameworks set out in the Priority Places Supplementary Guidance."

Schedule 2 sets the preferred strategy for Spango Valley as mixed use development including housing. The supplementary guidance which is a condition for support requires four things which the current proposal does not fulfil:- a comprehensive masterplan for the full site; provision of new paths through the site and new path links to the Clyde Muirshell Regional Park; and the accommodation of bus service provision through the site.

The proposals appear to be a significant departure from the local development plan without clear justification or overriding material considerations.

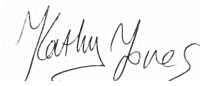
10. Green Data Centre definition

The term “Green Data Centres” is used once in NPF4 - turning up in Annex B - National Developments Statements of Need, under National Development 12 Digital Fibre Network which “supports the continued roll-out of world-class broadband across Scotland”. However, the term is not defined in the NPF4 glossary or anywhere else in the document.

We note that para 1.15 of the Planning Statement notes that in July 2026 the Council informed the applicant that it couldn’t make a judgement on whether the proposal constituted a green data centre based on the the information provided at that point. We imagine that making that judgement would still be impossible given the omission of relevant information from the planning application - including energy use, energy source, plant and cooling, treatment of waste heat etc. Scant information regarding climate impacts shouldn’t be considered adequate even for a planning application in principle given NPF4 Policy 1 requires significant weight to be given to the global climate and nature crises when considering all development proposals - let alone one specifically for a green data centre.

We don’t agree with the statement in the PAC report that siting a data centre next to a proposed BESS that may or may not be built or have any link to the data centre is enough to make it green.

Yours sincerely,



Kat Jones

Director, APRS

Additional Reference List:

Scottish Government’s NPF4 Planning Guidance on Policy 2 - Climate Mitigation and Adaption (June 2025)

Scottish Government, National Planning Framework 4 - lifecycle greenhouse gas emissions: Annex B: Assessment Methodology, 8 November 2022

The Planning (Scotland) Act 2019

The Raeshaw Farms Ltd v Scottish Ministers ruling - *Raeshaw Farms Limited v Scottish Ministers* [2026] CSIH 10.