



Supporting Document Cato Data Centre

A report to
Fife Council

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Document prepared for

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1 INTRODUCTION

1.1 The Application

This document supports an application by **ILI Cato Limited** (the “**Applicant**”) to Fife Council for Planning Permission in Principle under the Town and Country Planning (Scotland) Act 1997 (the “**Application**”), for a data centre facility at Land north-west of Auchtertool, Fife, nearby postcode KY2 5XW. The proposal is known as **Cato Data Centre** (the “**Development**”).

The Application seeks Planning Permission in Principle for the provision of a data centre campus comprising a complex of data hall buildings, plant, electricity substations, security fencing, gatehouses, internal access roads, parking, pathways, associated ancillary infrastructure, and landscaping including ponds, landscape bunds, new woodland, wetland, hedgerow, scrub, and wildflower meadow habitats. A set of drawings showing an illustrative layout of these features has been provided with the Application.

The purpose of the Development is to provide a facility where digital information (data) is processed, stored, replicated and secured. This is a feature of the modern world which requires a physical presence within the built environment.

In advance of submission, the Applicant has undertaken Proposal of Application Notice, Pre-Application Consultation, and Environmental Impact Assessment (EIA) screening with the Planning Authority. Fife Council concluded that the Development would not require EIA in the screening response of April 1st 2026.

1.2 Purpose of this Document

This report includes an appraisal of the existing site, describes the Development, provides supporting statements required by the Planning Authority, and acts as a reference for all of the information provided with the Application.

1.3 Planning Statement

The documents submitted in support of the Application address all relevant policies under National Planning Framework 4 (NPF4) and Fife Council’s Local Development Plan (LDP), for the purposes of Planning Permission in Principle.

Fife Council’s pre-application advice noted that whilst the Development would be generally supported by NPF4, as essential infrastructure contributing towards Scotland geospatial strategy, the Applicant must demonstrate that all LDP requirements have been met to establish the principle of development within a rural location.

Fife Council advised that the Application should address:

- Landscape and visual impact
- Amenity Impact
- Transportation and Road Safety
- Community and Economic Benefits
- Drainage and Flood Risk

- Natural Heritage including impact on Trees, Protected Species and Wildlife Habitats and Biodiversity Enhancement
- Sustainability/Tackling the Climate and Nature Crises
- Air Quality
- Contaminated Land
- Archaeological Impact
- Core Paths

A summary of how each matter has been addressed is provided in sections 3-14 of this document, including references to specialist assessments where these were undertaken. Each assessment specifies the specific planning policies addressed.

The Applicant proposes full consent to be achieved by Approval of Matters Specified by Conditions, subject to final technical design. Certain additional assessments are proposed where they have been recommended in specialist reports, and to which the Applicant has received proposals.

Any additional information would be provided by way of discharge of conditions upon determination, in agreement with the Planning Authority.

1.4 Site Description

The proposed Development Site is currently farmland, which forms part of Camilla Farm, north-west of the village of Auchtertool, Fife. The land is used for agriculture but is zoned in the current Fife Development Plan as Employment Land for industrial use (identified as an area of possible expansion of the Mossmorran gas plants). It is understood that Exxon Mobil has publicly announced the closure of their operations at Mossmorran and therefore the development of the site for the proposed use will not displace or disrupt any future extension.

There are no residential properties within 300 metres of the proposed buildings. The nearest residences are to the east at Camilla Road (around 300 metres), Little Raith and Glenniston Cottages (around 350 and 400 metres respectively, to the north) with Auchtertool Kirk around 700 metres to the south.

The surrounding area is a mix of agricultural uses, with scattered farms and dwellings, as well as large scale industrial uses and energy infrastructure including wind farms, pylons, solar and energy storage. The scale of the landscape is such that these various uses have and can be accommodated.

The substantial Mossmorran gas plant lies roughly 1.5 km to the west and directly occupy an area of around 100 hectares. Several wind farms are present in the surrounding area and there are two electricity substations and their associated pylon lines nearby.

There is a wooded gorge that runs through the site, the 'Auchtertool Linn Wildlife Site' through which Dronachy Burn flows. No part of the data centre facility would occupy this area and any paths and services will follow the route of the former railway line where possible.

2 DEVELOPMENT DESCRIPTION

2.1 Introduction

This section describes the Development in terms of its physical elements and an outline of the construction process, to inform consideration of its potential impacts. At this stage the technical design is not finalised and so the approach has been followed of describing a reasonable worst case in terms of impacts to inform consideration of potential effects.

2.2 Development Need

The location in Scotland gives greater energy efficiency, lower carbon intensity and better grid integration than other sites in the UK and elsewhere in the world.

A favourable climate with lower ambient air temperatures than comparable sites in the south of England gives more opportunity for 'free cooling' and lower annual energy demand. The UK electricity grid is undergoing a major overhaul with transmission capacity being added to connect new northern wind farms with load centres in the south – by providing new load in the north this project will reduce rather than add to the need for more transmission. Once a high-carbon electricity country, the UK is well on track to becoming a low-carbon electricity grid and within the UK, Scotland is the region with the lowest carbon electricity.

As electricity is the biggest cost for data centres. Scotland presents an opportunity to house processing in locations where excess renewable generation exists, reducing costs and boosting renewables integration.

Cato Data Centre will be the flagship of three interconnected data centres, known as 'The Stoics'. The projects would provide essential infrastructure across the Scottish Central Belt where IT services can be delivered in close proximity to the majority of end users, and where sufficient land electrical connection and renewable energy supply are available. The Applicant is able to ensure green energy supply via power usage agreements from other projects under their control, including Pumped Hydro Storage schemes.

2.3 Design

An iterative design process has been undertaken, responding to the specific characteristics of the site, specialist assessments, and the requirements set out in the Pre-Application Consultation, to produce an outline design for the purposes of Planning Permission in Principle. At the present stage the end user and final technical specification of the facility is yet to be established.

The outline design provides the extents and parameters under which a high quality final technical design can be produced. The illustrative layouts, provided to enable assessment of the principle of development and associated impacts, are indicative and subject to final design.

The scheme has employed embedded mitigation to reduce and minimise effects, such as: the design and placement of buildings, their colours and elevation treatments; landscape bunds; planting of trees and other biodiversity habitats; suitable ponds to retain surface water; selection and placement of ancillary equipment; provision of a safe active travel route into the site; and provision of electric charging points for staff vehicles.

Please see the **Design & Access Statement** for more details.

2.4 The Development

This section describes all elements proposed which comprise the Development, and states the key parameters which shall not be exceeded in any future design.

The Development is a campus-style data centre facility, comprising a number of data hall buildings. Each building houses a precision-engineered environment where data is processed, stored, replicated and secured, in servers and computer processors with IT equipment and associated mechanical and electrical plant. Each data hall building has its own office space and the south building / lab completes the 'campus' design.

Please see the **Design & Access Statement** for more details.

Development Area

For the purposes of Planning Permission in Principle a distinction has been made between the Development Area and the remaining area, both within the Application red line boundary. The Development Area (25 ha approx) shows the extent of the main built development and allows for construction to take place in phases.

The Development Area illustrative layout includes several subsections to aid description: a Main Building Area for data centre buildings and associated equipment; a Substation Area for power infrastructure; an Ancillary Area for other built elements associated with the operation of the facility; an Entrance Area allowing for vehicular and pedestrian access, security lodge and rejection route; and a Construction / Auxiliary Building Area including a South Building. The South Building could provide additional data centre or lab space, to be completed in the final phase, subject to requirements. The Auxiliary Building Area is proposed as the primary construction and lay down area in the prior phases of construction.

Area outside Development Area

The extensive area encircling the Development Area will be used for landscaping, biodiversity habitat and a new public path. Extensive areas of new woodland, wetland, hedgerow and wildflower meadow are proposed, to provide separation, screening and enhance biodiversity. Whilst detailed design of the built development within the Development Area will evolve in the detailed design phase, the surrounding landscaping area will remain as landscaping and biodiversity habitat. Definition of the landscaping and habitat areas will allow planting and enhancement to be undertaken at the earliest stages of development, enabling new habitats to be established and reach maturity as soon as possible. In the event of future changes within the Development Area, habitats and associated biodiversity gains would remain unaffected.

Built development outside the Development Area will be limited to road access, paths, below ground services, ponds and SuDS infrastructure

Free space within the Development Area in the final design will be considered within the program of ecological enhancements, to maximise the positive impact post-development.

Entrance & Access

A new entrance is to be formed into the site from the B925, including realignment of the B925 to provide a suitable safe junction. An adjacent path and cycle way is proposed to connect non-vehicular access back to existing routes near Auchtertool, with the benefit of improving pedestrian and cycle safety on this stretch of road. A secondary, emergency access will be taken from the K11 Auchtertool – Lochgelly road, modifying the route of an existing track into an S-bend to aid visual screening.

The access arrangements proposed have been considered via formal pre-application consultation with the local authority and will be finalised during the application process and associated reserved matters.

The construction traffic route will avoid approach from the village of Auchtertool to ensure local impact is minimised. The same would apply for HGV access to the site during operation. For further detail please see the Transport Statement. Full details will be provided at Approval of Matters Specified by Condition (“AMSC”) stage in a Construction Traffic Management Plan, subject to final design.

Internal Access & Roads

A new network of roads will be formed within the site with a running surface of asphalt. Roads will be speed restricted to ensure the safety of all road users. A dedicated pathway and associated road crossing points will be provided to ensure safe access for pedestrians and cyclists. Turning will be formed within the site for vehicles accessing the site, including potential oversized vehicle access to the substation area.

A dedicated route and associated turning area have been provided in the Entrance Area, which is outside of the main secure compound. This allows for potential public transport and refuse collection routes as necessary. The turning area at the entrance provides a rejection route for any vehicles reaching the gate without credentials to pass through.

A small amount of staff parking is provided at locations around the site, including accessible spaces and cycle storage in close proximity to the proposed buildings. A second parking area has been provided in a central location, with additional cycle storage. Parking here may be surplus to the expected number of core staff, but provides guest parking and margin. Total personnel numbers will depend on the final end user and design. All parking spaces are sized to include electric vehicle charging infrastructure. The final quantity of parking spaces will be agreed with Fife Council as part of the AMSC stage.

A new single span bridge will enable access for construction and operational traffic, and site personnel across the Dronachy Burn. Final bridge design and exact route will be finalised at AMSC stage.

The Development will accord with Fife Council’s Making Fife’s Places Transportation Development Guidelines of 2018.

New Public Path

An existing core path runs through the site. This route is currently hard to access on foot and is not well defined, or well used by walkers. It is not constructed nor maintained, lacks signage and can be overgrown. The core path continues down the K11 road towards Auchtertool, on-road with no footway after leaving the site boundary which may present safety issues for pedestrians in its current form.

A new public path, redirecting the route of the existing core path, is proposed in association with the Development. This would take in points of interest including the impressive wooded rock cutting of the former railway, cross a stone arch bridge, and run amongst new planted woodland between the Dronachy Burn and new wetland areas, eventually reconnecting with the existing core path route to the west. The pathway will be constructed, surfaced and signed. Planting of new trees is proposed along the route along with interventions to manage the existing habitats.

The proposed new route is shown on the Site Plan.

Main Building Area

The majority of the buildings on site will be data centres, which will include data halls, office space, external plant compounds, loading and staging areas to accommodate occasional HGV deliveries, and roof plant.

The Site Plan shows the illustrative layout, which accounts for all associated infrastructure, services and access, whilst minimising land take.

The layout includes six main data hall buildings of identical footprint. The buildings rise in height in a stepped fashion towards the west of the site where taller structures can be best accommodated by the site. The maximum height shown for assessment purposes is up to 35m above proposed ground levels. The main block, or body, of each data hall is fixed at circa 24.5m above ground level. The main architectural element, described in the Design & Access Report, is the 'stoa' or covered walkway. This feature is a consistent 12m in height and runs across the frontage of all of the data halls. A further building is included in the area south of the Dronachy Burn, with a maximum height up to 12m to match the 'stoa' on the main buildings. The building here forms the 'campus' and is expected to be used for labs / office space.

A final building design will be made at AMSC stage, and agreed with the Planning Authority. The number, position and massing of the buildings may change, but will not exceed the height parameters stated.

Ancillary Area

This describes the area to the south of the Main Building Area containing parking, various tanks for water storage and firefighting purposes, associated pump house and the heat network building.

Substation Area

The facility will host an on-site substation and will be connected to the existing nearby electricity grid by buried cables.

The Substation Area will include a transmission compound, with electrical transformers, disconnectors and associated equipment with a height of up to around 15 metres. The compound will be fenced off to ensure electrical safety. Switchgear buildings will be up to around 15m.

The site may employ uninterruptible backup power to ensure a secure and resilient facility.

Any electrical installations would be in accordance with regulations and practices current at the time, including but not limited to the Electricity Safety, Quality and Continuity Regulations 2002 as amended.

Electrical Connection

The Development will be connected to the existing National Grid nearby by buried cables. A firm connection offer is already in place via the National Energy System Operator.

Due to the critical need for such facilities to come online as soon as possible the Applicant is exploring further options for connection via existing nearby sites. Any new electrical connections to or within the proposed site, including existing routes, would be made by buried cables.

Fencing & Security

Site security will include a 24/7 staffed security gatehouse, cameras, remote sensors, and a secure fence all around the facility, expected to be predominately of trident topped palisade fence at 3m height.

Additional security measures will depend on the end user and technical design, but may include; double fence / mantraps; barbed wire tops; anti-climb spiked collars; electronic gates and doorways; vehicle traps; multi-step biometric access; dedicated guards and escorts.

Infrared security lighting will be used which is not visible to the naked eye. Audible intruder alarms will not be used.

Water Connection

The Development will be connected the public water supply and sewer network for operational and staff use. The outflows from the sustainable drainage ponds would flow to the burn and not to the sewer.

A new water main into the site and hydrants are proposed around the site. Internal tanks are proposed to retain rainwater for reuse.

Ponds & Drainage

A sustainable drainage system will be employed including several new ponds which will re-vegetate and provide new wetland habitat via retained pools below the outflow level. Buried storage tanks, gravel traps, and other features will be used. All drainage measures proposed are by gravity and will not require pumping.

A fully worked up design is presented in accordance with local and national policy. Should the design be changed as part of the AMSC process then a new fully worked up design would be presented.

Flood Area

Initial assessment indicated an area of river flooding from the Dronachy Burn over part of the site, due to an overland flow path in the event of a historical undersized culvert associated with the former railway.

In consultation with specialists, an area of 4.7 ha is allocated for flood storage, in consideration of a 1:200 year flood event adjusted for climate change plus suitable freeboard. The Development Area has been designed to achieve minimum Finished Floor Levels of 117.15 m AOD.

The landform will remain as natural as possible, and include some retention pools to ensure the continued health of relocated wetland habitat (marshy grassland and rush pasture). A strip of new trees is proposed around the western perimeter to create a riparian barrier.

Heat Network

The Applicant proposes a community heating network making use of heat from the Development to provide heating to the village of Auchtertool.

A building to house the equipment for the heat network terminal is provided within the Ancillary Area. A route for the necessary heating pipework between the site and the village has been set out. As well as for domestic use, subject to feasibility, the Applicant is open to having this used for agricultural purposes. The community benefit scheme includes for a

fund which can be used to enhance residential properties and make them more energy efficient, should the district heating option prove unviable.

Landscaping

Extensive landscaping is proposed in association with the Development, to give visual screening and create new habitats which complement and enhance the existing landscape and local biodiversity.

Tree planting is to be a mix of appropriate species, predominantly native broadleaves though some faster growing species would be used in areas critical to visual screening. Around the local Wildlife Site similar and complimentary species will be planted to enlarge this habitat and create nature corridors along the new walking route. Semi mature trees, including Scots Pine are proposed along the flood storage area to act as a riparian barrier and improved nature corridor, connecting the existing stand of pines to the west of the Substation Area. An area of new Scots Pine, and areas of mixed pine will extend existing habitats.

Areas of new scrub and new wildflower meadow will complement the existing landscape, greatly increasing biodiversity. Extensive new hedgerows will provide visual screening for road uses, and provide additional nesting and hunting habitat. The flood storage area and retention pools within the proposed ponds will create wetland habitat and mitigate for the loss of an area of existing marshy grassland and rush pasture.

Enhancement would include species diversification, infilling gaps in hedgerows, younger tree specimens to create mixed age woodland, disease checks (e.g. dieback) and replanting with appropriate species. All enhancement measures will be regularly monitored to ensure continued habitat health throughout the lifecycle of the facility.

A **Landscaping and Maintenance Plan** is proposed to ensure the new planting is successfully established. This will be finalised as a part of the AMSC process.

Planting and maintenance measures will include the following:

Wildflower meadow trimmed once per year in autumn after grasses have flowered and seeded. Yearly checks to ensure continued health of grass species planted, and deter any invasive weeds (including existing Horsetail). Any failing areas of grass and meadow to be re-seeded. Within the pond and immediate surround, the grass will be cut half yearly in spring before bird nesting and in autumn, following CIRIA SuDS Manual guidance. In dry periods, new trees should be watered every 2 weeks. Any failing or damaged trees are to be replaced in the first 5 years. Whip trees to be planted with vole or biodegradable trees guards only not plastic tree guards, which can retard growth. New hedgerow trimming to take place only after hedgerow has become established. All hedgerow trimming strictly after bird nesting season is over, and only as required for adjacent access and to maintain sight lines.

The ongoing woodland management will aim for good / mixed age woodland target condition for all tree areas in maturity. All woodland will be enhanced with in-fill planting of younger specimens and understory species. Any felled or trimmed tree branches are to be retained as herptile hibernacula to encourage invertebrates as food sources for larger animals. Translocated grassland will mitigate loss of existing ground nesting bird habitat, enhanced by new grassland and meadow creation. Bird and bat boxes are to be placed on suitable trees and under new / existing bridges to increase roost potential. Bird and bat friendly lighting will be employed e.g. shaded task lights and IR security systems to minimise impact on local species (in accordance with BCT GN08 guidance). 10cm gaps to be left underneath perimeter fencing to allow continued mammal access.

Free space within the Development Area will be prioritised for additional habitat and biodiversity gains following the final technical design. The overall landscape strategy has been developed in conjunction with ecological and landscape assessments. Any work landscaping including maintenance in the establishing years should be undertaken in consultation with the Ecological Clerk of Works. A full **Planting Plan** is proposed at a later stage, following the final technical design.

Landscape bunds are proposed in order to reuse any excess excavated material on site, subject to final site levels and detailed cut and fill exercise, in support of the principles of Zero Waste. Bunds would be planted with new trees to further soften visual impact.

Please see the **Landscaping Plan including outline Planting Plan** for more information.

2.5 The Construction Process

Under the AI Opportunities Action Plan and related AI Growth Zones the UK government aims to accelerate data infrastructure, requiring facilities such as Cato Data Centre to become online at the earliest possible stage. The rapid progression in data technology, supply chain complexity, and high levels of investment required, means constructing such facilities in phases is common. Data centre buildings and associated equipment may be designed, constructed and commissioned consecutively. The buildings may differ in technical layout, allowing the most efficient and high performance equipment to be selected.

Due to the phased approach full planning consent is proposed to be achieved by the Approval of Matters Specified by Conditions, in relation to each specific phase.

A Phasing Statement is proposed, setting out the various construction phases. This would be submitted alongside the final site masterplan, detailed layouts, updated assessments, and all other required documents such as the Construction Environmental Management Plan.

Based on the Phasing Statement, individual Phase Plans pertaining to a certain area of land will be provided including detailed design drawings and assessments relevant to that phase. This will allow for construction to begin in one phase, whilst the final design and associated consents are achieved for the next phase. The approach will also shorten the overall construction period, and therefore lessen any impacts associated.

2.6 Outline Construction Stages

The key construction stages are set out below. The on-site construction period is estimated to be around 3 years, but could be longer if for example the facility were built out in phases.

- **Enabling Works**
 - Undergrounding of overhead lines
 - B925 realignment and site entrance construction
- **Site establishment**
 - Form site compound
 - Site office, welfare, parking, staging area
- **Ground Works**
 - Form platforms
 - Construct sustainable drainage scheme and flood area
 - Foundations
 - Trench and lay cables
 - Fencing, landscaping, new planting
- **Installation**
 - Construct buildings
 - Fit out
 - Mechanical and electrical installation
 - IT equipment
- **Commissioning**
 - Checking and setting in operation of systems
 - Site reinstatement
- **Operation**
 - Ongoing maintenance of sustainable drainage and landscaping planting

Excavated material is expected to be reused on the site.

Working Times

Normal working times proposed for any noisy activity during the construction period, including operation of on-site equipment or vehicles, unless otherwise agreed with the Council, are 08h00 to 18h00 Monday to Friday, plus 0800 to 13h00 Saturday.

2.7 Example Image

At present there are no built hyperscale data centres in the UK and therefore an architect's impression visualisation of the proposed facility is included here for reference. This is based on the illustrative layout shown on the plans accompanying the application.



Cato Data Centre

3 SITE SELECTION APPRAISAL

The site was selected following a nationwide site search process for land with suitable characteristics. Three interconnected data centre projects, known as The Stoics, are being proposed by the Applicant to provide essential data services across the Scottish Central Belt. The proposed development site for Cato Data Centre is available land zoned for industrial development with no conflicting designations, and has good road access.

UK grid constraints are one guiding factor when selecting an appropriate site for data centre development. The required power connections, proximity to renewable power sources is preferable in supporting green energy use and grid stability without undue cost or environmental impact.

Sites with a cooler climate and breeze are able to operate more efficiently with more 'free cooling'. Thus a site in Fife can operate more efficiently than one in the London area for example. The breeze available at the site is evidenced by the surrounding wind energy developments. The scale necessary suggests rural locations with large areas of available land in close proximity Grid Supply Points.

Proximity to end users and 'edge' data facilities in terms of data latency is a key driver of investment, promoting schemes in areas close to users such as the Central Belt of Scotland.

Being a low bowl surrounded by higher ground, the Cato site reduces the visual impact of any large structures that are required with good set backs from homes. The scale of the landscape, and this site in particular, can accommodate the proposals without a significant impact on the surrounding area. Extensive proposed landscaping measures, including significant areas of new planting will further mitigate for any impacts in maturity.

Electricity substations lie nearby with capacity to accept the facility and a firm contract is in place to supply it. The proximity means that cable connections can be made underground, which will not increase visual impacts due to additional transmission infrastructure in the landscape. Suitable data and water connections are also available nearby.

Along with existing wind farms and battery storage sites, the local area is on track to become a major hub of onshore renewables, in consideration of both built and consented projects.

The chosen location on land near Auchtertool meets all of the selection criteria. No other land within a reasonable proximity, meeting all of the key selection criteria was identified at the time of land search. Note that to be eligible for selection as an AI Growth Zone sites must have a minimum of 100 acres.

As noted within the Pre-Application Consultation the land is identified for potential future expansion of the Mossmorran NGL gas plants. It is understood that Exxon Mobil has publicly announced the closure of operations at Mossmorran. Therefore the development of the site for the proposed use will not displace or disrupt future expansion. Exxon Mobil, being one of the two key facilities that together make up the Mossmorran Gas plants, was closed on 2nd February 2026, as widely reported in the media¹. There will be no plans for expansion at any time in the future. To help with Scotland's Just Transition new uses that bring employment must be found, and the proposed data centre at Cato would fit that criteria

The Applicant is actively exploring potential opportunities in using defunct power connections from the closing facility, which would accelerate the Development becoming operational.

1 [Mossmorran Stops Production After 40 Years With Jobs At Risk](#), BBC News, 03.02.26

4 SUSTAINABILITY & TACKLING THE NATURE CRISIS

Throughout the development of the project, significant weight has been given to the global climate and nature crises, as required under NPF4. The facility proposed will be powered by renewable energy in support of the Just Transition to Net Zero.

The Development will make meaningful ongoing commitments to sustainability including clean energy, power and water usage efficiency, circular economy, and circular energy such as those set out in the Climate Neutral Data Centre Pact. Material selection, construction methods and on site recycling facilities will be informed by the principles of Zero Waste.

Please see the **Energy Statement of Intention** for more information.

The final design of the facility will aim to achieve the highest technical standards such as the Open Compute Network's OCP Ready v2 accreditation, which prioritises efficiency and sustainability in hyperscale data centres through design. The outline design submitted in support of the Application has considered sustainability at the heart of the strategy to enable a final design to be produced in compliance with such principles.

Please see the **Design & Access Statement** for more information.

The Development has prioritised local ecology and biodiversity in the extensive landscaping proposals, which include a mosaic of new and enhanced habitats. A key aspect of the current nature crises is biodiversity collapse, the ecological maintenance measures proposed consider all aspects of biodiversity, including pollinators and invertebrates to support the local food web. The separation of the majority of the landscaping from the Development Area enables planting and ecological enhancement to be undertaken at the earliest stages of construction, allowing them to reach mature condition as soon as possible.

Please see the **Landscaping and Outline Planting Plan** for more information.

Adaptability has been allowed for in a final design by leaving free space to prioritise green infrastructure such as green roofs and walls, solar photovoltaic arrays for operational systems power and renewable fuel and additional planting within the Development Area prioritising biodiversity impact.

Adaptability also exists in the proposed phased approach to construction allowing the most efficient systems and advanced equipment to be employed.

The Development has been designed to adapt to current and future risks associated with climate change, such as drainage and flood measures considering 1:200 year events adjusted for climate change.

Please see the **Drainage Impact Assessment** and **Flood Risk Assessment** for more information.

Re-use of waste heat generated by the facility is proposed, a route for these services has been identified and initial viability studies for use in a district heating network have been undertaken. An alternative use for this heat could also be in food production if suitable land nearby could be identified, supporting the Food for Five initiative.

Though no specific end of life has been defined, the design enables future change within the Development Area without affecting the landscaping and associated biodiversity gains.

5 LANDSCAPE AND VISUAL IMPACT

The site was selected in part due to the existing landform, being broadly lower in the centre with higher ground around forming natural topographical screening. The outline design utilises the natural landscape setting, and extensive landscaping is proposed for additional visual screening. The siting, orientation and massing of the main buildings has been carefully considered to limit visual impact.

Please see the **Design & Access Statement** for more information.

The site is allocated in the Fife Local Development Plan as Employment Land for industrial use like that of the Mossmorran gas plant. Additional development in the surrounding area includes wind farms, electricity substations, energy storage and electricity pylons. The tallest element of any part of the data centre facility would be a maximum of 35 metres high, compared to 126 metres for nearby wind turbines (Little Raith Wind Farm), 100 metres for the gas plant, and 45 metres for the electricity pylons. The Development is lower in height and of less impact than existing nearby development.

The Applicant has commissioned a full and detailed assessment of potential impacts, including visualisations from key viewpoints against the Zone of Theoretical visibility, as agreed with the Planning Authority. Several additional viewpoints were subsequently included for best practice. Assessment included the nearby Cullaloe Hills and Coast local landscape area, though very few locations with open views into the site exist in the wider area. Several designated buildings such as Auchtertool Kirk were identified, and impacts are considered negligible.

Please see the **Landscape and Visual Impact Assessment** for more information.

6 NATURAL HERITAGE

6.1 Trees

The site contains some existing trees, particularly to the west of the site and along the burn side. Extensive areas of mixed species / age new tree planting are proposed, as well as entrancement to existing woodland, in order to provide wildlife habitat and visual screening, giving a further ecological benefit.

The Applicant commissioned an arboreal survey at an early stage. Most trees on site were found to be either Category B or C, and no veteran trees were identified. Whilst the design avoided notable specimens and sought to preserve existing trees and shrubs, a small number are to be removed to enable development. Root protection fencing and associated measures are proposed for the construction process.

Please see the **Arboricultural Impact Assessment** that includes Tree Protection Plans for more details.

The number and category of the trees to be removed does not constitute specific measures under Scottish Government Policy on Control of Woodland Removal, though compensatory planting at a minimum ratio of 3:1 ratio for any loss is proposed.

Constructing the new access bridge and walking route within the railway cutting may involve some additional trimming or felling, if danger to targets. An updated Tree Protection Plan is proposed, subject to final design.

The overall arboreal strategy would result in a significant gain of woodland areas and quality of associated habitats post-development.

6.2 Protected Species and Wildlife Habitats

The part of the site on which the facility would be sited is farmland, used for livestock grazing and considered to offer modest ecological potential.

The Applicant commissioned an in-depth ecological assessment, which included Schedule 1 protected species walkover, breeding bird, and mammal surveys. The surveys have not found significant populations, and no protected species were recorded within the site, though there was evidence of species such as badger in the wider area.

Please see the **Ecological Impact Appraisal (EcIA)** for more information.

The Auchtertool Linn Wildlife Site occupies a part of the overall site, being the old railway cutting and adjacent burn. Development within this area would be limited to enhancement, the formation of a new public path to facilitate recreation, and buried services within the path corridor.

Camilla Loch Site of Special Scientific Interest (**SSSI**) is located approximately 225 metres East of the site. It was concluded that there is no potential for direct impact on the SSSI. In the event that borehole water abstraction is later proposed in connection with the facility, then a full hydrogeological assessment should be carried out to inform the borehole design, and the loch should be monitored in borehole operation, to ensure no impact on the SSSI and on Groundwater Dependent Terrestrial Ecosystems (**GWDTE**). Any potential impacts in this respect are considered to be negligible and manageable via this mitigation.

An ecologist was consulted throughout the design process and the recommendations of the assessment have been adopted into the landscaping layout and proposed management plans.

A site-specific **Construction Environmental Management Plan (CEMP)** and cautionary **Protected Species Plans** will be prepared at the AMSC stage. An environmental clerk of works will supervise construction to ensure good practices are followed and protected species and habitats are not adversely affected.

The condition of habitats and nature corridors will be greatly enhanced post development.

6.3 Biodiversity

Due to considerate site design, the ecological assessment concludes the potential of the proposed facility to adversely affect habitats is negligible. It is considered that the extensive landscaping measures proposed will greatly enhance biodiversity within the site, and the surrounding area.

Though the Scottish Planning Biodiversity Metric (NatureScot) is not statutory, a best practice approach has been undertaken to ensure future conformity which may well be formalised before construction. The landscape and habitat measures proposed would provide a highly positive net gain to biodiversity post-development, under any method of assessment.

Please see the **EcIA** for more information.

7 AMENITY IMPACT

Amenity impacts arising from the proposed development have been considered in a comprehensive manner, encompassing matters including noise, transport, landscape and visual effects, and air quality. These topics are assessed in detail within the relevant sections of this report and supporting technical documents.

Taking these assessments together, it is recognised that the Development will introduce change to the existing environment. However, the nature and extent of that change is not such that it would result in any unacceptable or material adverse impact on the amenity or living conditions of nearby receptors.

Furthermore, the proposals incorporate a number of measures and design responses which serve to mitigate potential effects and, in certain respects, provide enhancements to the existing baseline conditions.

7.1 Noise

The facility will generate some noise during operation, primarily associated with the operation of fans.

The Applicant commissioned assessment including environmental noise measurements, following the calculations in ISO 9613-2:1996 and BS4142:2014 and giving further details of the noise sources and receptors.

A worst case approach, using a dense layout of external plant was used to ensure fair assessment for Planning Permission in Principle. The facility has been designed to provide acceptable impact at nearby receptors, including mitigation measures such as roof compound louvres.

Data halls within the Axillary Area are considered to be surplus to requirements, to be constructed in the final phase, and are only included in the illustrative layout for design contingency and fair assessment. The building heights stated here are lower in consideration of visual impact. The proposal is to utilise this space for lab / office space, rather than data halls. If data halls are proposed here as part of the AMSC different approach to technical layout would be undertaken to ensure any adverse noise sources are fully mitigated, such as placing certain elements indoors.

The final design will be made in close consideration of stipulated limits. Re-assessment of noise impacts based on the final equipment selection and placement is proposed at the AMSC stage to ensure impacts are acceptable.

Please see the **Noise Impact Assessment** for more details.

7.2 Lighting

It is not expected that the facility will cause unacceptable impacts in operation. The majority of the built form of the data halls will be windowless. The facility will not employ dusk to dawn external lighting, except for around pedestrian access points to maintain safety. All site lighting should seek to limit light pollution wherever possible, including use of materials such as electro-chromic glass in office windows.

A **Lighting Impact Assessment** is proposed at the AMSC stage. The assessment will include specific measures to protect local wildlife including such as bats and birds, such as those set out in the EclA.

A specific lighting assessment for the construction period, especially when working hours may overlap with dark periods in winter, will be included within the CEMP.

7.3 Air Quality

Air quality in the wider area is actively monitored by SEPA mainly due to the nearby gas plants. Air quality is a key consideration in data centre facilities using air handling systems,

particularly in urban environments where filtering may be required. The Development is not in an Air Quality Management Area.

The Applicant commissioned an assessment of existing data, national and local standards, and any predicted impacts due to the Development. The assessment concluded that any associated emissions, including construction traffic and dust is not expected to have an unacceptable impact. Existing air quality is expected to improve due to changes in vehicle emission standards, and the part decommissioning of the Mossmorran gas plants.

Please see the **Air Quality Impact Assessment** for more details.

8 TRANSPORT, ROAD SAFETY AND ACCESS

Construction will involve bringing plant and materials into the site, a mixture of HGV and light commercial traffic, much like any other development. Construction is expected to be phased over several years, with most of the specialist 'digital' work taking place within the buildings themselves during the fit-out phase.

In use, the facility will operate 24/7 and is expected to employ a full-time staffing of 120. Access and parking arrangements have been considered to these estimations, including overflow and guest parking.

Some abnormal loads are expected to be needed to bring heavy plant and equipment to site. The existing alignments within the site allow for this and the vehicle dimensions are such that no works to highway furniture on the roads leading to the site is necessary. Swept path tracking will be presented at AMSC stage for the selected vehicle set-up.

A **Construction Traffic Management Plan (CTMP)** will be produced and implemented, with input and approval from the Council as Road Authority. An outline plan has been prepared for this Planning in Principle stage.

Please see the **Transport Statement** for more information

9 CORE PATHS

Existing core path R496 runs through the site, and then on to the K11 public road. Fife mapping and site visits found that the existing route is currently indistinct and underused, as confirmed during public consultations.

It is proposed that this path will be rerouted to run alongside the Dronachy Burn and via the disused railway line, thus linking linear features of amenity value likely to be appreciated by walkers. The new route will be a constructed and maintained path, and removes the existing section on the public road with no footway.

Please see the **Design & Access Statement** for more details.

The change to the path is considered positive, making the route more accessible and improving upon the current position. Other local core paths were assessed in terms of visual impacts, but none had any significant levels of impact.

Please see the **Landscape and Visual Impact Assessment** for more details.

The proposed new route, following the deep and impressive rock cutting of the former railway line surrounded by existing woodland would be entirely screened from the development. The western section of the new path will run between the natural feature of the Dronachy Burn with existing trees, and a new wetland / pond. Additional planting is proposed on the banks to enhance and improve habitats. The path will be a positive local

amenity impact, providing access to the Auchtertool Linn Wildlife Site, which itself is to be enhanced in the program of landscaping, resulting in the creation of a pleasant public space post development.

The railway cutting including stone bridge, and the pond from a disused distillery are a part of the area's cultural heritage. Signage is proposed to inform the public of the area's historical past and emphasise the importance of natural and cultural heritage to future generations.

Please see the **Heritage Impact Assessment** for more details.

The new path along the former railway line is also proposed as the route of buried services (waste water, district heating, electricity) subject to final technical investigations. This will lessen the impact of such routes, and associated service access on the proposed landscaping.

The programme of works will take careful consideration of the existing and redirected routes, and ensure public safety. Works will not unnecessarily restrict access to the core path during the construction period, temporary diversions may be used where necessary.

The Applicant considers that resulting impact on Fife's core path network will overall be positive.

10 FLOOD RISK AND DRAINAGE

The Development has been designed in consideration of flood and surface water drainage storage, and has additional storage for rainwater harvesting. Each aspect has been addressed.

The assessments undertaken are based on the designed layout. At the final design subsequent to permission in principle, assessments will be updated to demonstrate compliance of the final drainage strategy once more.

The Development will not cause any increased flood risk downstream. No assets, equipment or persons will be at increased risk due to flooding.

The Application includes the required signed certificates under Fife Council's Flooding and Surface Water Management Guidance draft v3 of April 2025.

10.1 Flood Risk

The site is situated in an area at risk of on-site localised flooding as identified by SEPA flood maps. Though the depth of water in a flood event would likely be negligible, the effected area is wide and the risk is classified as high (greater than 10 year return). This key issue was identified at an early stage.

Please see the **Design & Access Statement** for more information.

Specialist assessment was undertaken at the outset of design to develop a suitable design and ensure compliance with national planning policy.

A suitable area is reserved for flood storage, and is in addition to the areas required for retention of storm water from the development area itself. The layout ensures sufficient finished floor levels are achieved, and sufficient access and egress during flood events in compliance with local planning policy.

Please see the **Flood Risk Assessment** for more information.

10.2 Drainage

The sustainable drainage system proposed is in accordance with local and national policies.

The Applicant undertook a drainage assessment to inform the design. A stage 2 detailed design was undertaken based on the layout and associated impermeable surfaces, to produce a system compliant with local planning policy.

Please see the **Drainage Impact Assessment** for more information.

The areas initially reserved for external ponds in the outline design were maintained into stage 2 design despite the inclusion of additional measures (such as tanks) described in section 2.4. This is to retain the proposed areas for wetland enhancement and to allow contingency for a final design. Rainwater harvesting is to be used in conjunction with the system of retention ponds resulting in further attenuation.

Please see the **Design & Access Statement** for more information.

11 WATER SUPPLIES

The facility will have a water supply for staff use, mechanical systems and for firefighting mains. Scottish Water conducted an assessment in association with an offer of connection.

Scottish Water engineering standards do not permit new connections where there would be a material deterioration of service for existing users. In this case capacity to supply the development was confirmed and a suitable connection point identified. Scottish Water noted that there is capacity for the Cato Development without change at Mossmorran and in the event of the recently announced closure of the Exxon Mobil plant, a significant water user connected to the same supply, then there would be significant additional capacity.

The latest energy and water efficient systems will be employed including rainwater harvesting and reuse of process water within the site.

Please see the **Energy Statement of Intention** for more information.

It has been confirmed by Scottish Water that there is existing capacity for the Development without impact on existing customers in Fife. The development will not have any impact on private water supplies.

12 ARCHAEOLOGICAL IMPACT

Existing cultural heritage records were reviewed including Pastmap, Canmore, Historic Environment Record, scheduled monuments, and listed buildings. The Applicant undertook a Heritage Impact Assessment.

Remains within the site include:

- Former Hallyards House and adjacent cottage
- Former Kirkcaldy & District railway line, including cutting, embankments, culverts, bridges, rebuilt distillery reservoir

Neither site is designated i.e. not listed, not a scheduled monument, not within a Garden or Designated Landscape, not within a conservation area, and not a noted battlefield. The remains at Hallyards are limited to a few small sections of wall, which are likely to have been in this condition for over 100 years. An electricity line runs through the former house. Given the condition and assessment of the remains, the proposed approach to this asset is to record and remove the remains.

The heritage assessment concluded that the disused railway line would be adversely impacted as the feature is still in evidence. However, the railway line has been in-filled for many years to allow for agriculture and is barely discernable after it leaves the cutting westwards.

The former railway cutting and nearby distillery reservoir are to be enhanced by the creation of a new walking and cycling route, and associated landscaping. In further mitigation, public information signage is proposed commemorating the area's pre- and post-industrial past, which is relatively poorly documented.

A Written Scheme of Investigation is proposed, including 100% open area investigation of the Halyards remains and 8% trial trenching of the entire site, to be agreed with Fife Archaeology Unit. The CEMP will include a Toolbox for any additional remains discovered during groundworks. An archaeological clerk of works and watching brief will be employed.

Please see the **Heritage Impact Assessment** for more information.

13 COMMUNITY & ECONOMIC BENEFITS

13.1 Socio Economic Benefit

To assesses the social and economic benefits of the Development, the Applicant commissioned an in depth report. The report considers the investment potential of the facility, related impacts on local employment, education and skilling, and supply of goods and services during construction and operation.

The Development is expected to generate £5 billion of inward investment. The figure is assumed to be conservative at the current market value of such projects globally. Further investment would be required in terms of the procurement and supply of equipment, which was scoped out of the assessment to provide a fair reflection of tangible benefit. Additional significant revenue will be generated locally in the form of business rates.

Estimates of staff levels and job types were provided for fair assessment, and local institutions were identified that could provide the education required for high skilled jobs within the community.

Please see **Economic & Wider Impacts of Cato Data Centre** report for more information.

The actual investment value, construction requirements and staff levels will depend upon the final design and end user.

13.2 Statement of Community Benefit

The Applicant has engaged with Auchtertool Community Council and associated community trust throughout all stages of the project. Consultation with the council and local residents has identified areas which could be improved by contributions from the proposed facility in operation.

It is proposed that:

- The Development will contribute funds within the range of £150,000 to £250,000 towards the refurbishment and operation of an out of use local eatery and former pub, to create a community hub.
- The Development will contribute £500,000 towards local educational courses and apprenticeships, and provide employment routes directly through on site campus

facilities. The Applicant would be keen to work with Fife Council and the local community to retrain former Mossmorran gas plant staff.

- The Development will provide infrastructure for the export of waste heat, to be used in a district heating network, subject to viability.
- The Development will create a fund that local people can access to fund the improvement to the fabric of local homes, and green infrastructure including insulation, heat pumps and solar arrays.

The Development will also provide indirect community benefits, such as: increasing access to a range of data service providers; enhancing local amenities and accessibility; boosting the local service economy; creating new habitats and enhancing biodiversity. The proposed provision of clean energy to residences mostly reliant on fossil fuel will aid the Just Transition to Net Zero.

The Applicant is committed to meaningful and effective community benefits associated with the Development. Discussions with the local community will continue throughout all stages of the project, with benefits to be formalised in a **Community Benefit Agreement** prior to full planning consent, subject the final design and cost benefit analysis of the project.

14 CONTAMINATED LAND

The Pre-Application Consultation noted the potential for ground gas emissions and land contamination from historic mining and the infilling of the disused railway line. The Applicant has undertaken and presented a comprehensive assessment. The issue relates to the former railway within the site. Being a rural section of line with no stations, sidings or any lineside uses, risk is considered low.

During the groundworks for the Mossmorran gas plants, prior to the construction or operation of any gas plant, inert material from the Mossmorran site was employed to infill a length of former railway cutting at the Cato site.

Please see the **Geo-Environmental Investigation and Risk Assessment**, Stage 1.

A second stage in-depth ground investigation is proposed prior to final design in order to inform that design and to provide assessments for the Approval of Matters Specified by Conditions phase.

No adverse impact on site infrastructure, staff, local residents or neighbouring properties are expected.

15 CONCLUSION

The Development will enable essential infrastructure to be deployed, providing major economic and benefits and sovereign data security. The location has been selected to be close to available grid connection and renewable power sources, in a landscape conducive to development at a suitable scale, and in close proximity to large populations of data users in the Scottish Central Belt.

The Development is compatible with energy and carbon targets, grid stability and resilience, and will provide a high biodiversity benefit. The Development will provide employment both during construction and in operation, with direct employment and many contractors and indirect value added.

The Development has been designed in compliance with appendix G (Transportation Development Management Guidelines) of Making Fife's Places Supplementary Guidance. Proposals relating to the design, layout, green network infrastructure and natural heritage and biodiversity enhancement have been duly considered.

The Application complies with Scottish Planning Circular 3/2022 and related guidance for applications for Planning Permission in Principle. The Development is compliant with all relevant policies under National Planning Framework 4 and Fife's Local Development Plan.

The project has been assessed against a range of potential issues, and any associated impacts have been identified. There would be some temporary impact during construction which would be carefully managed in consultation with Fife Council.

The Development as proposed, in combination with the final design that would be approved via the process of Approval of Matters Specified by Conditions, will ensure there are no unacceptable adverse impacts due to the Development during construction or in operation.