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Dear David,

Thank you for your letter of 23 March regarding the request from the City of Edinburgh Council's Planning Committee for a definition of what constitutes a "Green Data Centre." I am grateful for the helpful context you have provided, including the adjusted addendum to the Committee report.

As you note, National Planning Framework 4 identifies Green Data Centres as national developments where these would otherwise meet the threshold for major development, reflecting their strategic and economic importance. NPF4 does not seek to establish a single, prescriptive definition of a "green data centre". Instead, it sets an outcomes-focused framework within which planning authorities are expected to assess proposals on a case-by-case basis, having regard to local circumstances and the specifics of individual developments.

The Committee is also correct in referring to the written parliamentary response of October 2025, which highlighted a number of criteria that planning authorities may wish to consider—namely the extent to which a proposed data centre:

- is powered by renewable energy sources,
- incorporates energy-efficient technologies,
- minimises water consumption, and
- supports the re-use of excess heat.

These criteria continue to provide a useful basis for assessing proposals, recognising the rapid evolution of both the data centre sector and wider low-carbon

infrastructure. I acknowledge the Committee's view that greater clarity on a definition would support consistent decision-making across Scotland, particularly in relation to energy, water usage, and opportunities for heat recovery.

You will be aware that, shortly before the pre-election period, further representations were received by the Scottish Government from a range of stakeholders, including local authorities, raising broader questions about data centre development, including calls for a pause on further consents. In light of the potential policy implications of these representations, and taking account of the pre-election period, it was considered appropriate not to issue further detailed or piecemeal clarification at this stage. We do, however, recognise the points raised by the Planning Committee about the practical challenges of applying policy in complex or sensitive locations, including issues around heat networks, water use, and Environmental Impact Assessment.

These are matters we intend to return to early following on from the recent election, including considering whether additional guidance or supporting material would be helpful to planning authorities and applicants in applying NPF4 consistently and effectively. I will ensure that the Committee's request and the accompanying points in the addendum are drawn to the attention of incoming Ministers in due course.

On Friday 20 March, the Scottish Government published its [AI Strategy for Scotland 2026-31](#). This sets out a number of commitments, including by 2027 to publish guidance on what factors are prevalent in a 'green' data centre.

Once we have considered further with incoming ministers the request from City of Edinburgh Council's Planning Committee, I will ensure that you are updated on any outcomes or further guidance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Fiona Simpson', with a stylized flourish at the end.

Dr Fiona Simpson, FRTPI
Chief Planner and Director