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Climate Action Committee
The Scottish Parliament
Edinburgh
EH99 1SP
Via e-mail:
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8 October 2026

Dear Stuart,

Re: Inquiry into the environmental impacts of AI data centres

Thank you for your letter of 21 September 2026 to myself and Gillian Martin MSP, Cabinet Secretary for Climate Action and Rural Affairs, regarding the Climate Action Committee's inquiry into the environmental impacts of AI data centres. I am replying as Minister with portfolio responsibility for planning matters. I welcome the Committee's interest in this important and rapidly evolving area.

I recognise the broad range of views and concerns associated with the opportunities and impacts of data centres. I have been clear we must balance the economic and employment interests in developing data centres with national energy, climate and community wealth building ambitions, which are vital to our future prosperity, as well as the potential impact on local communities.

The Programme for Government; details, timescale and status of proposed strategic approach

As you note, through the Programme for Government, the Scottish Government has committed to publish a strategic approach to attracting and securing responsible green data centre investment in Scotland, with clear expectations around environmental sustainability, resource use, community benefit and the economic and strategic value these developments should deliver.

The strategic approach will be informed by evidence on energy demand, water use, environmental impacts and wider infrastructure requirements. It will set clear expectations around environmental sustainability, resource use and reuse, community benefit, and the economic and strategic value that developments should deliver. This work builds on the Scottish Government's Green Data Centres and Digital Connectivity Vision and Action Plan and its wider ambition to support green data centre investment that makes best use of Scotland's renewable energy resources while contributing to net zero ambitions.

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This cross-Government strategic approach will inform the development and delivery of the Programme for Government commitment.

To deliver the PfG commitment, we are developing two related but distinct pieces of work;

- 1) a strategic approach setting out how Scotland will look to secure responsible data centre investment and assess its environmental, infrastructure, economic and strategic implications; and
- 2) the publication of national planning guidance on data centres before Christmas 2026.

In line with the PfG commitment, the Scottish Government aims to deliver the strategic approach in 2026-27, with the exact timescale to be confirmed. Scottish Ministers appreciate the interest from all sectors in the content of the strategic approach and have asked officials to progress this as a priority.

The Committee further asks how stakeholders will be engaged, and what data sources will inform the “expectations around environmental sustainability” and “resource use”. We have engaged a range of agencies including Scottish Water, SEPA, the National Energy System Operator (NESO) and Zero Waste Scotland around considerations relating to environmental sustainability and resource use and reuse.

National planning guidance

The committee asks for details of the timescale for publishing planning guidance, how this will incorporate the resolution of the Parliament of the 16th September, and on Scottish Government plans to report back to Parliament on the development of the guidance.

Responding to the motion agreed in Parliament on 16 September, I have committed to publishing national planning guidance on data centres before Christmas. The guidance will inform national and local decision-making on current and possible future data centre planning applications and will provide clarity on the potential spatial, community and social impacts of any such developments.

Stakeholder Engagement on national planning guidance

The committee also asks how stakeholders and the public will be involved in the development of planning guidance. It may be helpful if I firstly set out the purpose of the guidance, which is to assist applicants, planning authorities and other participants in the planning system to effectively plan for data centre developments, so that development is appropriately sited, designed, and responsive to its context.

As a matter of law, all planning applications must be determined in accordance with the statutory development plan, unless material considerations indicate otherwise. Currently, the statutory development plan in Scotland comprises NPF4, together with the relevant local development plan. The development plan, including NPF4 policies, must be read and applied as a whole in reaching objective judgement on any planning application.

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The guidance will not alter our long-standing planning and wider environmental regulatory frameworks, and will not alter national planning policy. As noted above, the latter is currently set out in National Planning Framework 4 (NPF4), which was published and adopted in 2023 following extensive consultation and engagement and approval by the previous Scottish Parliament. Any future changes to NPF4 would have to be evidenced and carefully considered and must follow the statutory process set out in The Town and Country Planning (Amendment of National Planning Framework) (Scotland) Regulations 2024. This includes a requirement that any amendment proposal is to be brought before the Scottish Parliament and requires approval by a resolution of the Scottish Parliament.

In developing the guidance, the Scottish Government will draw on targeted input from planning authorities, key agencies and relevant experts from within the scientific community to ensure it is informed by the best available evidence and expertise. Existing mechanisms within the planning system will continue to provide opportunities for communities and the public to influence decisions about future development proposals, and the guidance can help support that including through advice on early engagement with communities.

There are already wide ranging opportunities built into the planning system to ensure people and communities can get involved and have their say about the development and use of land in their area. This includes when planning authorities are preparing their local development plans and during the development management process when decisions are being made about proposed developments. Local Place Plans also offer a way for communities to set out their aspirations for their place through their own proposals for the development and use of land in their area. The planning system sets requirements around neighbour notification for proposals and requires pre-application consultation with local communities for certain larger-scale development.

I have issued a direction which requires all planning applications for new data centres over 50MW power capacity to be accompanied by an Environmental Impact Assessment (EIA) and this applies to both new and existing applications. EIA development may only be determined after the planning authority has made available and taken into account the EIA Report and the comments received, including from the public, and reached a reasoned conclusion on the proposal's likely significant environmental effects and any required mitigation.

The Scottish Government continues to work with Scottish Water, SEPA, the National Energy System Operator UK Government and Ofgem to expand the evidence base necessary to support sustainable data centre development. Scottish Water is also advising the industry on location decisions, the use of alternative water supplies (including the reuse of treated wastewater) and, where alternative water supplies are not available, the need to use closed-loop systems to reduce overall demand on water resources. Scottish Water's development process is designed to ensure that there are no impacts of any new development on services to local populations.

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The definition of 'green data centre'

The Scottish Government has previously set out factors for consideration by planning authorities in this matter, and this includes the extent to which a data centre is powered from renewable energy sources, uses energy-efficient technologies, seeks to minimise water consumption and supports the reuse of excess heat. As confirmed above, the Scottish Government will publish further guidance by Christmas.

In the meantime, the National Planning Hub has been working with planning authorities to share knowledge and understanding of the sector.

Timescales for planning determinations

Through the [planning direction](#), I published on 17 August 2026, the Scottish Government is closely monitoring live data centre applications and their intended determination timescales. The Scottish Government does not anticipate any such applications being determined by planning authorities before the planning guidance is issued.

I hope this provides the Committee with a helpful overview of the work under way.

Thanks



HANNAH MARY GOODLAD