

Agenda Item	7.1
Report No	PLN/041/21

## HIGHLAND COUNCIL

**Committee:** North Planning Applications Committee

**Date:** 15 June 2022

**Report Title:** 22/01584/PAN: SSE Generation  
Gordonbush Wind Farm, By Moulin Cottage, Brora,  
Sutherland, KW9 6LX

**Report By:** Area Planning Manager – North

### Purpose/Executive Summary

**Description:** Erection and Operation of a hydrogen electrolyser plant, hydrogen storage, control room, access road and ancillary infrastructure

**Ward:** 04 - East Sutherland and Edderton

### Recommendation

Members are asked to note the submission of the PAN and highlight any material issues they wish to be brought to the attention of the applicant before the submission of an application for planning permission.

## **1.0 BACKGROUND**

- 1.1 This report informs the Planning Applications Committee of the submission of the attached Proposal of Application Notice (PAN).
- 1.2 The submission of the PAN accords with the provisions of the Planning etc. (Scotland) Act 2006 and was made valid on 1 April 2022. The PAN is a statutory requirement for planning applications for major or national developments and must be lodged at least 12 weeks prior to the submission of a planning application. Members are asked to note this may form the basis of a subsequent planning application.
- 1.3 The submitted information attached includes:
- Proposal of Application Notice (Application Form)
  - Location Plan
  - Supporting Cover Letter
- 1.4 Due to relaxations in COVID-19 restrictions the applicant proposes to hold the following face to face public events:
- Event 1: Wednesday 20 April 2022, 1100-1800hrs, at Brora Scout and Guide Hall; and
  - Event 2: Summer 2022 (date and time to be confirmed), at Brora Scout and Guide Hall.
- 1.5 The applicant also proposes to undertake two rounds of virtual public events. These will allow members of the public to engage in live discussion. The first round took place on Monday 18 April 1700-1900hrs and on Friday 22 April 2022 1400-1600hrs. The second round is due to take place in Summer 2022 (date and time still to be confirmed). A webpage has also been set up detailing the proposals at:
- [www.sserenewables.com/onshore-wind/green-hydrogen-co-location/gordonbush-wind-farm](http://www.sserenewables.com/onshore-wind/green-hydrogen-co-location/gordonbush-wind-farm)
- 1.6 The consultation will be publicised and advertised in accordance with the appropriate statutory requirements with adverts to be placed within the Northern Times at least seven working days before each of the two consultation events. An invitation maildrop will also be undertaken by the applicant to all properties on Clynelish Road to make people aware of the proposed development. Details of all notified parties are contained / appended to the PAN form and include Brora Community Council and local ward Councillors, MSP and MP.
- 1.7 Any forthcoming application will be accompanied by a Pre-Application Consultation (PAC) report explaining the consultation undertaken, feedback received, and any resultant amendments made to the planning application.

## **2.0 DESCRIPTION OF PROPOSED DEVELOPMENT**

- 2.1 The PAN provides notice of the applicants intention to submit a planning application classified as a major development. The proposed development comprises an electrolyser system that could produce approximately 2,000 tonnes of Hydrogen per

annum. The area within the site to be developed would extend to around 1.87ha and includes a site platform of approximately 220m x 70m, with site infrastructure measuring up to 5.2m in height. The indicative layout shows the development would likely include the following infrastructure:

- Modular electrolysis units;
- Fixed hydrogen storage;
- Hydrogen storage tube trailers;
- Auxiliary process plant;
- Dispenser units to fill the tube trailers;
- Infrastructure for water supply and treatment;
- Internal access roads;
- Foundations and hardstandings (including construction of site drainage);
- Perimeter security fencing; and
- Security lighting.

2.2 The facility would utilise electricity from Gordonbush Wind Farm to produce green hydrogen. In doing so it will utilise electricity that would have otherwise been considered surplus or constrained, due to a lack of capacity on the grid network. This electricity would be used to produce green hydrogen via the proven method of electrolysis. This is a process by which an electrical power source is connected to two electrodes which are placed in water. When an electrical current is passed through the system, hydrogen will appear at the cathode and oxygen at the anode. During its peak of production, the facility would be cable of generating approximately 8 tonnes of hydrogen gas per day, which would be exported from site via trailer for use as a clean alternative fuel source for vehicles, heating systems or other industrial processes currently reliant on conventional gas. The facility is proposed to utilise the existing access and re-use the former temporary construction compound area as well as its former borrow pit.

2.3 A separate Battery Energy Storage Site (BESS) proposal is also being brought forward in parallel with the hydrogen facility. This would be capable of storing surplus electricity generated from the wind farm. It would have a generating capacity of 20MW and require around 16 containers to house lithium-ion batteries with this facility to be located close to the wind farm's substation and underground connection to the grid. The BESS will be the subject of a separate consenting process, requiring consent under Section 36 of the Electricity Act 1989. The Council will be a consultee on any Section 36 application which may be made to the Scottish Government's Energy Consents Unit.

2.4 The applicant has sought pre-application advice through the Council's Pre-Application Advice Service for Major Developments, with pre-application advice having been issued March 2022 (22/00082/PREMAJ).

### **3.0 SITE DESCRIPTION**

3.1 The proposal of application notice boundary comprises some 720ha of predominantly moorland on Gordonbush Estate, approximately 11 km to the north-west of Brora, Sutherland. This included the site boundary of Gordonbush wind farm extension, which became operational in June 2021.

- 3.2 The site is bounded to the north-east by the operational Gordonbush Wind Farm and a 275kV overhead transmission line immediately to the west of the site. Further to the south of the site lies Loch Brora and a scattering of dispersed properties. The proposed location for the hydrogen facility is surrounded by higher landforms with the exception of lower lying ground located to the south west. There are a number of small forestry blocks on the lower ground around the southern area of the site. The access to the site would be via the A9 Trunk Road at Brora, along an existing 8km single track road with passing places. This route was used and upgraded for developing the existing wind farm and its recent extension.
- 3.3 The site is not located within any natural or built heritage designation. The Caithness and Sutherland Peatlands Special Area of Conservation (SAC), Special Protection Areas (SPA) and Ramsar Site protected for otter, peatland habitats and upland birds lies to the north west. Coir an Eoin Site of Scientific Special Interest (SSSI), designated for its central watershed blanket bog, is also located to the north west. 2.5km to the south on the south westerly shore of Loch Brora lies Carol Rock SSSI which is designated for its botanical importance.
- 3.4 The site sits within three types of Landscape Character Areas including Sweeping Moorland and Flows (LCT 134), rounded hills - Caithness and Sutherland (LCT 135) as well as Strath – Caithness and Sutherland (LCT 142) as defined by NatureScot, but is not located within any international or regional landscape designations. Wild Land Area (WLA) 35 Ben Kilbreck-Armine Forest is located to the north west.
- 3.5 There are no designated cultural heritage features within the site, however there are some historic environment features identified on the Council's Historic Environment Record.
- 3.6 A number of watercourses are located within the site boundary. The site itself is free from flood risk, however, immediately to the east and west, outwith the site is identified being at risk of fluvial flood risk 1 in 200 years based on the indicative flood risk maps produced by SEPA. Part of the site is within areas of Class 1 and 2 peatland habitats, identified being nationally important within Carbon and Peatland Map 2016.

#### **4.0 DEVELOPMENT PLAN**

The following policies are relevant to the assessment of the proposal:

##### **4.1 Highland Wide Local Development Plan (2012)**

- 28 - Sustainable Design
- 29 - Design Quality and Place-making
- 30 - Physical Constraints
- 31 - Developer Contributions
- 36 - Development in the Wider Countryside
- 55 - Peat and Soils
- 57 - Natural, Built and Cultural Heritage
- 58 - Protected Species
- 59 - Other Important Species
- 60 - Other Important Habitats

- 61 - Landscape
- 63 - Water Environment
- 64 - Flood Risk
- 66 - Surface Water Drainage
- 67 - Renewable Energy Developments
- 69 - Electricity Transmission Infrastructure
- 72 - Pollution
- 73 - Air Quality
- 74 - Green Networks
- 77 - Public Access

#### 4.2 **Caithness and Sutherland Local Plan (CaSPlan ) (Adopted 2018)**

No specific policies are relevant.

#### 4.3 **Highland Council Supplementary Guidance**

- Developer Contributions (Nov 2018)
- Flood Risk and Drainage Impact Assessment (Jan 2013)
- Green Networks (Jan 2013)
- Highland's Statutorily Protected Species (Mar 2013)
- Highland Renewable Energy Strategy and Planning Guidelines (May 2006)
- Physical Constraints (Mar 2013)
- Roads and Transport Guidelines for New Developments (May 2013)
- Sustainable Design Guide (Jan 2013)
- Special Landscape Area Citations (Jun 2011)
- Onshore Wind Energy Supplementary Guidance (OWESG) (Nov 2016) and Addendum Supplementary Guidance: Part 2b (2017)

#### 4.4 **Scottish Government Policy and Guidance**

- Scottish Planning Policy (June 2014)
- National Planning Framework 3, NPF3 (June 2014) and consultative draft NPF4 (Nov 2021)
- Scotland's Energy Strategy 2017 and Scotland's Energy Strategy Position Statement (Mar 2021)
- Onshore Wind – Policy Statement Refresh 2021 Consultative Draft (Oct 2021)
- Onshore Wind Energy (Statement), Scottish Government (Dec 2017)
- PAN 1/2021 – Planning and Noise (Mar 2011)
- Circular 1/2017: Environmental Impact Assessment Regulations (May 2017)
- PAN 60 – Planning for Natural Heritage (Jan 2008)
- 2020 Routemap for Renewable Energy (Jun 2011)
- Wind Farm Developments on Peat Lands, Scottish Government (Jun 2011)
- Energy Efficient Scotland Route Map (May 2018)
- Assessing Impacts on Wild Land Areas, Technical Guidance, NatureScot (Sep 2020)

### 5.0 **POTENTIAL MATERIAL PLANNING CONSIDERATIONS**

- a) Development Plan
- b) National Policy

- c) Planning History
- d) Design and Layout
- e) Landscape and Visual Impact (including cumulative impacts)
- f) Construction Impact
- g) Roads, Transport and Access (including outdoor access and recreation)
- h) Noise
- i) Natural Heritage (including ornithology)
- j) Water, Flood Risk and Drainage
- k) Soils and Peat
- l) Built and Cultural Heritage
- m) Economic Impact (including tourism)
- n) Decommissioning
- o) Any Other Material Considerations (including any raised within representations)

## **6.0 CONCLUSION**

- 6.1 The report presents the information submitted to date as part of the PAN. The policy considerations against which any future planning application will be considered have been summarised as well as the potential material planning considerations and key issues based on the information available to date. The list is not exhaustive and further matters may arise as and when a planning application is received and in the light of public representations and consultation responses.

## **7.0 IMPLICATIONS**

- 7.1 Not applicable.

## **8.0 RECOMMENDATION**

- 8.1 It is recommended the Committee notes the submission of the PAN and advises of any material issues it wishes to be brought to the applicant's attention.

Designation: Area Planning Manager – North  
 Author(s): Peter Wheelan / Negar Maydanchi  
 Background Papers: Documents referred to in report and in case file.

Relevant Plans: Plan 1 – Proposal of Application Notice  
 Plan 2 – Location Plan

## PROPOSAL OF APPLICATION NOTICE MOLADH BRATH IARRTAIS

The Town and Country Planning (Scotland) Act 1997 as amended by the Planning Etc. (Scotland) Act 2006 Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2008

**The Council will respond within 21 days of receiving the Notice. It will advise whether the proposed Pre-application Consultation is satisfactory or if additional notification and consultation above the statutory minimum is required. Please note that a planning application for this proposed development cannot be submitted less than 12 weeks from the date the Proposal of Application Notice is received by the Council and without the statutory consultation requirements having been undertaken. The planning application must be accompanied by a Pre-application consultation report.**

Applicant: SSE Generation Address: Inveralmond House, 200 Dunkeld Road, Perth, PH1 3AQ  Phone 01738 456000 E-mail Richard.hearnden@sse.com	Agent Ash Design + Assessment Ltd Address 21 Gordon St, Glasgow, G1 3PL  Phone 0141227 3388 E-mail Info@Ashglasgow.com
--	---

### Address or Location of Proposed Development

Please state the postal address of the prospective development site. If there is no postal address, please describe its location. Please outline the site in red on a base plan to a recognised metric scale and attach it to this completed Notice

Gordonbush Wind Farm, By Moulin Cottage, Brora, Sutherland, Kw9 6lx

The Proposed Development is located on Gordonbush Estate, approximately 9.5 km to the north-west of Brora, Sutherland, within the Highland region of Scotland. The Proposed Development would be located within the site boundary of Gordonbush Wind Farm Extension, which became operational in 2021.

The Green Hydrogen Facility and temporary construction compound would be located to the south-west of the turbines on land that was formerly used as the temporary construction compound during construction of the wind farm development. This area has since been reinstated.

The Site Location is shown in Appendix 1 – **GORH-CVL-SK-0011 PAN Red line boundary**

### Description of Development

Please include detail where appropriate – eg the number of residential units; the gross floorspace in m of any buildings not for residential use; the capacity of any electricity generation or waste management facility; and the length of any infrastructure project. Please attach any additional supporting information.

The Proposed Development would consist of an electrolyser system that could produce approximately 2,000 tonnes of Hydrogen per Annum. The site would extend to 1.87 Ha, based on the site platform of approximately 220 metres (m) x 70 m. The initial indicative layout of the facility is set out in Figure 3 and would involve the following infrastructure:

- Modular Electrolysis Units;
- Fixed Hydrogen storage;
- Hydrogen storage tube trailers;
- Auxiliary process plant;
- dispenser units to fill the tube trailers;

- infrastructure for water supply and treatment;
- internal access roads;
- foundations and hardstandings (including construction of site drainage);
- perimeter security fencing; and
- security lighting.

The facility would reuse the existing platform structure extending where required, including the existing access tracks and a reinstated borrow pit. Site drainage would be constructed around the perimeter of the facility.

**Pre-application Screening Notice**

Has a Screening Opinion been issued on the need for a Proposal of Application notice by the Highland Council in respect of the proposed development?

If yes, please provide a copy of this Opinion.

Yes/No

Community Consultation [See checklist of Statutory minimum consultation attached]

State which other parties have received a copy of this Proposal of Application Notice.

Community Council/s Brora Community Council (Host)	Date Notice Served 01/04/2022
Names/details of any other parties Elected Members – Ward 4 East Sutherland <i>Richard Gale</i> <i>Deirdre Mackay</i> <i>Jim McGillivray</i> Maree Todd MSP Caithness, Sutherland and Ross Jamie Stone MP Caithness, Sutherland and Easter Ross	Date Notice Served 01/04/2022  01/04/2022  01/04/2022 01/04/2022

Please give details of proposed consultation

Proposed public event	Venue	Date and time
• Public Exhibition 1	Brora Scout and Guide Hall	20/04/2022
• Public Exhibition 2	Brora Scout and Guide Hall	Summer 2022
Newspaper Advert – name of newspaper	Advert date (where known)	
• Northern Times	08/04/2022	
Future advertisements for exhibitions will be at least 7 days prior to event		






Details of any other consultation methods (date, time and with whom)

- Virtual Exhibition 1 - 18<sup>th</sup> - 22<sup>nd</sup> April 2022
- Virtual Exhibition 2 - Summer 2022

Signed  Date.....




**LEGEND**

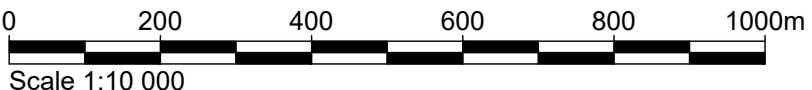
-  TRACK
-  SITE
-  BORROW PIT
-  PROPOSED CABLE
-  COMPOUND & ACCESS TRACK RED LINE BOUNDARY



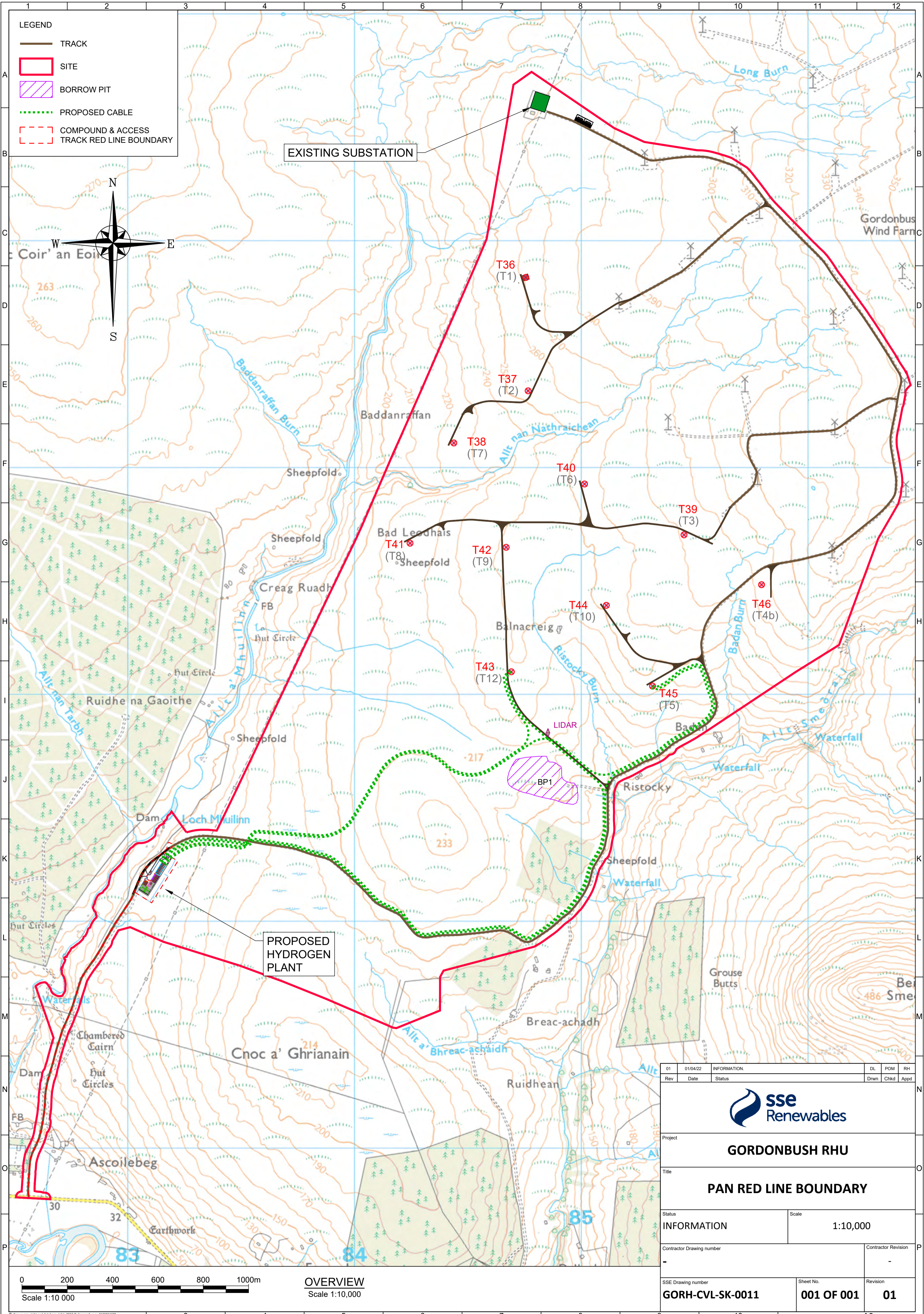
EXISTING SUBSTATION

PROPOSED HYDROGEN PLANT

01	01/04/22	INFORMATION	DL	POM	RH
Rev	Date	Status	Drwn	Chkd	Appd
					
<b>GORDONBUSH RHU</b>					
<b>PAN RED LINE BOUNDARY</b>					
Status			Scale		
INFORMATION			1:10,000		
Contractor Drawing number			Contractor Revision		
-			-		
SSE Drawing number		Sheet No.	Revision		
<b>GORH-CVL-SK-0011</b>		<b>001 OF 001</b>	<b>01</b>		



**OVERVIEW**  
Scale 1:10,000



© Crown copyright and database rights 2022 Ordnance Survey 0100031673.