

Agenda Item	5.4
Report No	PLN/077/22

HIGHLAND COUNCIL

Committee: North Planning Applications Committee

Date: 18 October 2022

Report Title: 22/04329/PAN: SSE Generation
Gordonbush Wind Farm, by Moulin Cottage, Brora, KW9 6LX

Report By: Area Planning Manager – North

Purpose/Executive Summary

Description: Erection and operation of a hydrogen electrolyser plant and associated 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). This site has previously been subject to a Proposal of Application Notice in 2022 (22/01584/PAN) for the erection and operation of a hydrogen electrolyser plant, hydrogen storage, control room, access road and ancillary infrastructure. However, the site area has been increased to accommodate a potential surface water abstraction point on the Allt a'Mhuillin river to serve the proposed development. As a result, a new Proposal of Application Notice was required.
- 1.2 The submission of the PAN accords with the provisions of the Planning etc. (Scotland) Act 2006 and was made valid on 29 September 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 Statement Cover Letter
- 1.4 The applicant plans to hold a public event on 22 November 2022 (time to be confirmed) at the Brora Scout and Guide Hall, as well as a virtual exhibition between the 21 to the 25 November 2022, inclusive of two question and answer sessions on 21 November from 1700-1900hrs, and 25 November 1400 to 1600hrs. The events will be advertised in the Northern Times w/c 7 November 2022. The applicant was requested to undertake a letter drop to all properties in proximity of the site. It has confirmed that all properties within the Brora Community Council boundary will be notified of the proposal of application notice and the consultation events.
- 1.5 Details of the online consultation will be made available through the applicant's webpage at the following link:
- <https://www.sserenewables.com/onshore-wind/green-hydrogen-co-location/gordonbush-wind-farm/>
- 1.6 Details of all notified parties are contained / appended to the PAN form and include Brora Community Council as well as local ward Councillors.
- 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 1,600 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 65m, 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

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 or patrick.o'malley@sse.com	Agent Ash Design + Assessment Ltd Address 21 Gordon St, Glasgow, G1 3PL Phone 0141227 3388 E-mail info@ashglasgow.com
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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.

This minor amendment to the area associated with this PAN includes an additional area adjacent to the Allt a Mhulinn river to the confluence with the Bull burn.

The Site Location is shown on **Figure 1 – GORH-CVL-SK-0011 PAN Red line boundary rev05**

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 **1,600** tonnes of Hydrogen per Annum. The site would extend to 1.87 Ha, based on the site platform of approximately 215 metres (m) x 65 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. 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 (22/01574/SCRE) – see attached

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 & 27/9/22
Names/details of any other parties Previously Elected Members – Ward 4 East Sutherland <i>Richard Gale</i> <i>Deirdre Mackay</i> <i>Jim McGillivray</i>	Date Notice Served 01/04/2022
Elected Members – Ward 4 East Sutherland <i>Richard Gale</i> <i>Leslie Anne-Niven</i> <i>Jim McGillivray</i>	27/09/2022
Maree Todd MSP Caithness, Sutherland and Ross	01/04/2022 & 27/9/22
Jamie Stone MP Caithness, Sutherland and Easter Ross	01/04/2022 & 27/9/22

Please give details of proposed consultation

Proposed public event	Venue	Date and time
• Public Exhibition 1	Brora Scout and Guide Hall	20/04/22 (completed)
• Public Exhibition 2	Brora Scout and Guide Hall	22/11/22

Newspaper Advert – name of newspaper

- Northern Times

Advert date (where known)

08/04/2022 and w/c 7/11/22




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

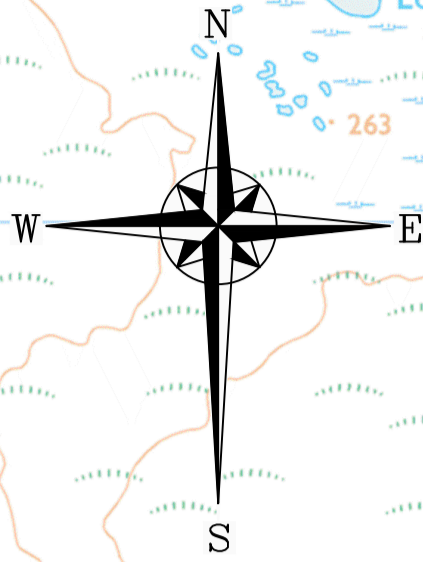
- Virtual Exhibition 1 - 18th - 22nd April 2022 (completed)
- Virtual Exhibition 2 - 21st – 25th November 2022

Signed ...



..... Date.....29.09.22.....

- LEGEND**
-  TRACK
 -  PAN BOUNDARY
 -  PROPOSED CABLE



EXISTING SUBSTATION

PROPOSED HYDROGEN PLANT

Rev	Date	Status	Drwn	Chkd	Appd
05	16/09/22	INFORMATION	DL	RH	RH
04	13/07/22	INFORMATION	DL	POM	POM
03	06/07/22	INFORMATION	DL	POM	POM
02	25/04/22	INFORMATION	DL	RH	RH
01	01/04/22	INFORMATION	DL	POM	RH



GORDONBUSH RHU

PAN RED LINE BOUNDARY

Status	Scale
INFORMATION	1:12,500

Contractor Drawing number	Contractor Revision
-	-

SSE Drawing number	Sheet No.	Revision
GORH-CVL-SK-0011	001 OF 001	05

