



ScottishPower Renewables UK Limited

Land Adjacent to Whitelee Windfarm – Green Hydrogen Production Facility

Design Statement









Report for

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Executive summary

Purpose of this report

- This report has been produced for the purpose of providing information about the design objectives that have been applied and the subsequent design process that has taken place to inform the proposed green hydrogen production facility (the Proposed Development) that is the subject of the Full Planning Application under the Town and Country Planning Act 1997, as amended.
- The Design Statement (DS) should be read in conjunction with the associated Planning Statement (document reference 43122-WOOD-XX-XX-RP-T-0001_S0_P01.1) which provides a detailed description of the final layout of the Proposed Development and its various components.
- This DS includes consideration of the design process involved on the proposed green hydrogen production facility. For further information on the Project background please refer to **Section 2** of the Planning Statement.
- Neither a DS nor a Design and Access Statement form a statutory requirement for this Full Planning Application, but it is considered that in the interests of best practice a brief DS is appropriate.
- Regulation 13 of the Town and Country Planning (Development Management Procedure)
 (Scotland) Regulations 2013 states that a Design Statement is termed as "a written statement about the design principles and concepts that have been applied to the development and which:
 - Explains the policy or approach adopted as to design and how any policies relating to design in the development plan have been taken into account;
 - Describes the steps taken to appraise the context of the development and demonstrates how the design of the development takes that context into account in relation to its proposed use; and
 - States what, if any, consultation has been undertaken on issues relating to the design principles
 and concepts that have been applied to the development and what account has been taken of the
 outcome of any such consultation."
- 1.1.6 Based on the requirements of Regulation 13 as listed above, this Design Statement:
 - describes the steps that have been taken to appraise the environmental context of the site location and demonstrate its suitability in principle for a renewable energy development; and
 - explains the design strategy adopted for the Full Planning Application for the green hydrogen production facility, and how the policies relating to design in the Local Development Plan and other relevant policy guidance documents have been taken into account.







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1. Introduction

1.1 Background

- This DS has been prepared to accompany an application by ScottishPower Renewable UK Limited (the applicant) for consent under Section 32 of Town and Country Planning (Scotland) Act 1997, as amended for the erection of a green hydrogen production facility capable of producing up to 10,000kg (10 tonnes) of green hydrogen per day. The Proposed Development is located on a 1.8 hectare area of land at located immediately west of the existing Whitelee Windfarm at Eaglesham Moor (the Site) within the administrative boundary of East Ayrshire Council (EAC).
- For the avoidance of doubt, this Statement is not intended to be a Design and Access Statement (DAS) but rather a short and concise document outlining the design considerations and iterative approach to the siting and location of the proposed green hydrogen production facility and its infrastructure. Under Regulation 13 of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013, the proposed application for the green hydrogen production facility does not fall within the categories of a national or major development [13(1)], not is it a local development where that land it is situated within falls within the categories outlined in Regulation 13(2)(a f). Given this, the requirement for a DAS in respect of this application is not a statutory requirement.

1.2 The applicant

- The applicant is part of the ScottishPower group of companies operating in the UK under the lberdrola Group, one of the world's largest integrated utility companies and a world leader in wind energy. ScottishPower now only produces 100% green electricity focusing on wind energy, smart grids and driving the change to a cleaner, electric future. The company is investing over £4m every working day to make this happen and is committed to speeding up the transition to cleaner electric transport, improving air quality and over time, driving down bills to deliver a better future, quicker for everyone.
- The applicant is at the forefront of the development of the renewables industry through pioneering ideas, forward thinking and outstanding innovation. Its ambitious growth plans include investment in new large-scale solar deployment, green hydrogen production and innovative grid storage systems including batteries. The company is also delivering the Iberdrola Group's offshore windfarms in the southern North Sea off East Anglia as well as other large-scale onshore wind projects throughout Scotland.
- 1.2.3 With over 40 operational windfarms, the Applicant manages all its sites through its world leading Control Centre at Whitelee Windfarm, nearby the Site.

1.3 Role and purpose

This DS provides information on the principles and approach that have guided the design process for the Proposed Development. It demonstrates how the Site, as detailed in **Section 2**, and its surroundings have been fully appraised to ensure that the final design solution achieves a balance across a range of factors which are required to be addressed. It describes the starting point for the design of the Proposed Development, the various factors that have driven the design process, and subsequent iterations to the layout that were made in response to the environmental and technical considerations.





This DS should be read in conjunction with the EIA Report, Planning Statement, and other documents supporting the application. This DS has been prepared – as far as practically possible – in accordance with Regulation 13(4) & (5) of the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 which sets out the detailed requirements of the content of a Design and Access Statement in relation to an application planning permission. Whilst the submission of a DS is not a statutory requirement for a local planning application, this has been prepared in the interest of producing a comprehensive application.

2. Design principles and design evolution

2.1 Technical and environmental constraints

This section discusses the key design issues and constraints relevant to the Proposed Development and the way they have been addressed in its layout and design.

Use

- The Proposed Development comprises a green hydrogen production facility and its supporting ancillary infrastructure.
- Due to the land required for developments of this type, they are generally located outside of urban areas and within the countryside where the capacity to accommodate such developments exists. The Site offers many benefits in this regard, specifically good access to the national motorway network via the M77; the availability of developable space for the solar PV farm at a location capable of providing sufficient solar yield to power the Proposed Development; and its relationship with the adjacent Whitelee Windfarm and Extension, which allows existing infrastructure to be efficiently utilised and offering the opportunity to further Whitelee's reputation as a centre for excellence in renewable energy technology and infrastructure within the UK.
- Access to/from the green hydrogen production facility is taken via the 1.5km link/haul road which would serve the solar PV farm and which links to the north west of the Site. The link/haul road would serve both the solar PV farm and the Proposed Development; given that its routing is through the solar PV farm, and given its function as the main access road to the solar PV farm for maintenance and management of the arrays, it is considered that it is more appropriate for the link/haul road to be proposed within the S36 application.
- The extent of the Proposed Development has been refined and finalised and has taken potential environmental effects into consideration. A series of technical assessments accompany this application, assessing the potential environmental effects of the Proposed Development both on the Site and on identified receptors beyond the site. These technical assessments form **Volume 2** of the accompanying EIA Report, (document reference 43122-WOOD-ZZ-XX-RP-T-0001_S3_P01.1).
- As a result of the iterative design process, development is confined to locations within the Site where effects have been limited as far as possible and are considered justifiable when considered in the context of its benefits, including to support national targets in the decarbonisation targets set by the Scottish Government under the net zero agenda. Consideration of the planning balance which weighs up all material factors associated with the Proposed Development is contained within the accompanying Planning Statement.

2.2 Layout and scale

The green hydrogen production facility has been designed based on the plant requirements for the electrolyser technology being adopted. In this case, the form and scale of the green hydrogen production facility is fully informed by its requirements. As far as possible, the site area proposed for the green hydrogen production facility has been reduced so as to only accommodate the infrastructure required, and has been sited so as to minimise its impact on areas of deep peat and associated ecological constraints. Full details of the infrastructure required for the green hydrogen production facility are included within **Section 3** of the accompanying Planning Statement





(document reference 43122-WOOD-XX-XX-RP-T-0001_S0_P01.1). However for ease of understanding, a brief summary of the details of the Proposed Development is outlined below.

The extent of the green hydrogen production facility site measures 120m x 120m based on a site platform of 1.44 hectares and includes the temporary construction laydown area. The temporary construction laydown area on its own encompasses a size of 120m x 30m and spans the north boundary of the Site and would be formed of temporary hardstanding. **Table 2.1** provides the detailed dimensions of the various elements of the Proposed Development.

Table 2.1 Balance of Plant and Associated Infrastructure

Plant Information	Indicative Proportions (L x W x H)	
Hydrogen electrolyser stack house	35m x 30m x 6.5m	
Hydrogen purification unit	30m x 15m x 4m	
Site office with associated staff and visitor parking	10m x 8m x 5m	
Transformer compound	30m x 8m x 3.45m	
Water purification unit	15m x 10m x 4m	
Water supply kiosk	2.5m x 2.5m x 3.2m	
SPR substation	12m x 12m x 5m	
H2, O2 and H2O separation unit	3m x 3m x 12m	
O2 capture unit	10m x 12m x 6m	
N2 bottles/skid unit	5m x 8m x 3m	
Air compressor unit	10m x 8m x 2.5m	
Compressor house	15m x 10m x 6m	
Lube oil storage and cooler	10m x 10m x 9m	
H2 storage vessels/racks	39m x 27m x 5m	
Security gatehouse	3m x 3m x 4m	
Internal fencing	max height 3m	
External security fencing	max height 3m	
Pipework gantries	N/A	
4 No. filling bay valves on 1 pipework skid (for H2 filling of tube trailers on-site for export off-site)	N/A	
Foundations and hardstanding	N/A	

The green hydrogen production facility is of a low scale with the maximum height of its structures not exceeding 15m. Of the structures proposed, the tallest are the vent stacks (15m), with the majority of the buildings and infrastructure at a level of 8m or lower.



- Due to its intrinsic link to the proposed solar PV farm which would be located westerly adjacent to the Site, and in order to minimise the amount of cable run and cut and fill associated with the burying of HV cable apparatus, the green hydrogen production facility has been sited as far as possible within the solar PV farm. The intention is to integrate the Proposed Development within the surrounding infrastructure, taking further advantage of the screening opportunities which would be created by the solar PV panel arrays.
- It is accepted that the green hydrogen production facility does represent the introduction of an industrial development within an otherwise undeveloped rural site; however, contextually the impact of this introduction is greatly minimised due to the high modification of the landscape character as a result of the turbines which form Whitelee Windfarm and Extension located immediately east of the green hydrogen production facility site.
- For the avoidance of doubt, a full description of the process associated with the green hydrogen production facility is contained within the associated Planning Statement (document reference 43122-WOOD-XX-XX-RP-T-0001_S0_P01.1) as well as within **Volume 2, Chapter 3** of the EIA Report (document reference 43122-WOOD-ZZ-XX-RP-T-0001_S3_P01.1).

Siting

- The impact upon the local landscape character has been given careful consideration during the site selection process for the Proposed Development. While a development of this size will inevitably have some effect on landscape character, it has been located so to minimise its effect as far as possible.
- In support of this application, a Landscape and Visual Impact Assessment (LVIA) has been undertaken which considers the landscape and visual effects of the green hydrogen production facility. This LVIA can be viewed within **Volume 2**, **Chapter 7** of the accompanying EIA Report (document reference 43122-WOOD-ZZ-XX-RP-T-0001_S3_P01.1).
- lt is considered that the landform and vegetation including a large bank mature forestry to the north boundary of the Site helps in the mitigation of the potential effects resulting from the installation of the development.
- While it is recognised that the forestry to the north of the Site is commercial in nature and therefore its use as a screening device cannot be guaranteed in perpetuity, a balance between location and visual impact has had to be achieved. In order to deliver a financially viable scheme and in order to minimise other environmental impacts it has been necessary to site the green hydrogen production facility as close to the proposed solar PV farm as possible.
- Once established that the proposed green hydrogen production facility required to be situated as close to the solar PV farm as possible, it has been necessary to therefore determine the most appropriate location for the site, taking account of all environmental constraints. In undertaking this exercise a number of factors were considered:
 - The relative landscape character of the northern section of Eaglesham Moor and potential for significant environmental effects resulting from loss of landscape character;
 - The topography of the landscape;
 - The proximity of sensitive receptors, including surrounding residential properties;
 - The ground conditions and the engineering considerations of construction of the Proposed Development on wet modified bog;
 - The impact on carbon rich soils;



- Other biodiversity considerations arising from known constraints identified during preapplication survey work;
- Hydrological considerations and potential impacts on watercourses, private water supplies and ground water dependent terrestrial ecosystems.

2.3 Design evolution and process

- The Proposed Development as presented in this application and its accompanying EIA Report has been the subject of a number of iterations and refinements which seek to mitigate by design predicted adverse effects as far as reasonably practicable. The resultant proposal balances the environmental and technical constraints, whilst producing an economically viable Project overall. Design changes made as a consequence of the key constraints are considered to be mitigation which is 'embedded' in the design.
- The ultimate Site selected for the Proposed Development was chosen through an iterative design process which sought to carefully balance the factors listed above. Initially, the site for the Proposed Development had been considered c. 950m to the north west of the current Site boundary at Grid Reference NS 50238 47446.
- Logically, consideration was given to this initial location due to its close proximity to the B764 and the ease of access and transportation. Ultimately however this location was discounted as it was unsatisfactory due to the proximity to the nearby residential properties of Kingswell and Best Friends as well as the visually prominent location relative to the B764 and M77 and due to the large areas of deep peat and watercourses within the immediate vicinity.
- Following the discounting of the initial site, further data was gathered in respect of the ground conditions within the wider northern section of Eaglesham Moor. To facilitate this, peat probing was undertaken which provided a constraints parameter both in terms of the siting of the proposed solar PV farm, but also, consequently that location of the green hydrogen production facility.
- As greater knowledge of the underlying peatland was gained, the overall possible locations for the Proposed Development narrowed and it was determined that localised areas of deeper peat should be avoided. This, coupled with the requirement to identify watercourse buffers, provided significant limitation to the location of the Proposed Development.
- A second site was then selected, which addressed a number of constraints but was ultimately deemed to be sub-optimal from the perspective of the underlying ground conditions as well as its potential to impact on biodiversity. This location was located c. 300m west of the Proposed Development's Site at Grid Reference NS 50994 47257.
- Following the discounting of the second site, consideration was given to an area of land to the south which benefitted from shallower peat and presented less impact on peatland habitat. The primary constraint affecting this site has been its partial inclusion within the existing Whitelee Windfarm and Extension Habitat Management Area (HMA). This effect of this has meant that the ecological impact assessment (EcIA) conducted in support of this application (please refer to Volume 2, Chapter 6 of the EIA Report (document reference 43122-WOOD-ZZ-XX-RP-T-0001_S3_P01.1) has had to account for the partial loss of existing HMA within its recommendations for mitigation.
- Ultimately, however this was deemed to be the most appropriate location for the Proposed Development as it addressed a number of physical site constraints, positioned the Proposed Development away from residential receptors and allowed for the solar PV farm layout to be built around the Proposed Development as a way of minimising environmental impacts but also mitigating, to a degree, its limited visual impacts.







The finalised location of the proposed green hydrogen production facility can be viewed within **Figures 1.1** and **1.2** which have been submitted in support of this application.

3. Design Policy and Guidance

3.1 Introduction

- The siting, layout and design of the Proposed Development has had particular regard to the following policy and guidance:
 - Scottish Planning Policy (SPP); and
 - East Ayrshire Local Development Plan (LDP2017) and associated Supplementary Guidance.
- Sections 4, 5 and 6 of the supporting Planning Statement (document reference 43122-WOOD-XX-XX-RP-T-0001_S0_P01.1) provides detailed descriptions of the relevant policies that have informed the design of the Proposed Development. Sections 3.2 and 3.3 below provide summaries of the key design policies.

3.2 Scottish Planning Policy

- Scottish Planning Policy (SPP) was published in June 2014; its purpose is to set out national planning policies that reflect priorities of the Scottish Ministers for operation of the planning system and the development and use of land through sustainable economic growth. SPP aims to promote a planning process that is consistent across Scotland but flexible enough to accommodate local circumstances. SPP demonstrates a commitment to sustainable growth through a balance of promoting development in the appropriate places.
- The SPP strongly promotes good quality design of development, from initial concept through to delivery. Specifically, for energy developments in sensitive areas, SPP recognises the need for significant protection through detailed and efficient design. Consideration to demonstrate that any significant effects on the qualities of sensitive areas can be substantially overcome by siting, good quality design and mitigation is required.
- The relevant policy in the SPP is a material consideration that carries significant weight. It sets out the Scottish Government's expectations regarding the treatment of specific planning issues within development planning and development management. The SPP includes policies relating to sustainable development and renewable energy which are directly applicable to the Project, as detailed below.
- To implement this Vision statement, the SPP identifies four planning outcomes based on the themes of the NPF3, which are:
 - "Outcome 1: A successful, sustainable place supporting sustainable economic growth and regeneration, and the creation of well-designed, sustainable places..."
- SPP Paragraph 169 sets out the criteria to be considered in the determination of energy infrastructure developments. Those of relevance to the layout and design of the Project components include:
 - cumulative impacts;
 - impacts on communities and individual dwellings, including visual impact, residential amenity, noise and shadow flicker;
 - landscape and visual impacts, including effects on wild land; and







public access, including impact on long distance walking and cycling routes and scenic routes.

Notably, the site and surrounding locale does not contain statutory designations which would limit the opportunity to develop a green energy scheme, such as the proposed green hydrogen production facility. Given this, primary consideration is on site specific impacts and potential impacts to the wider locale which may arise. Careful consideration has been given to the selection of the application site as outlined above within **Section 2** so as to ensure that the Proposed Development is located in the most suitable, and least environmentally impactful location possible. It is considered that this has been achieved in respect of the Proposed Development and while the ultimate appearance of the green hydrogen production facility is primarily dictated by its infrastructure requirements, the scheme would be compliant with the aims of the SPP.

In addition, it is noted that as the Proposed Development does not represent a wind farm development, the Spatial Framework for wind farm development contained within the SPP is not applicable to this development. Nonetheless, when reviewed against the groupings contained within the Spatial Framework, the Site would fall within Group 3. This has previously been established in the prior application to extend Whitelee Windfarm at this location.

3.3 Local Development Plan policies

The relevant development plan relating to the Project is the EAC Local Development Plan, which was adopted in 2017 (LDP2017). The relevant LDP2017 policies as they relate to design are considered below:

Table 3.1 LDP2017 Policies

Policy/Guidance	Overview and Objectives	Response
Overarching Policy OP1	This policy provides a list of criteria all development proposals must satisfy to be deemed acceptable. Where a development proposal demonstrates their contribution towards sustainable development, should these contributions outweigh their lack of consistency with parts of this policies criteria then their contributions towards sustainable development can soften the criteria. As this policy is overarching the policy is concerned with ensuring developments conform with all policies of the LDP, have no unacceptable impacts on the environment, are well designed and of an appropriate size and scale to their surroundings, creates no unacceptable impacts on the landscape character and protect important natural and built heritage assets	The Proposed Development has been designed to a standard which is suitable for its form and function and has been sited and scaled to minimise its appearance and impact on key receptors such as landscape and visual. The Proposed Development has also been designed to ensure it takes as little land as possible and is located outside of areas of important natural/carbon capture resources such as peat, ensuring the Proposed Development has been designed and developed with sustainability in mind. In broad terms, the proposal would accord with the overarching aims of Policy OP1 of the LDP2017.
Policy IND3: Business and Industrial Development in the Rural Area	Policy IND3 allow for the creation of renewable energy related developments within rural areas where the development proposal has demonstrated it has been considered critically against relevant policy and satisfies those policies. The policy is therefore wide ranging in terms of renewable energy developments as it enforces the importance of the other policies within the LDP and for developments to be considered critically against their various requirements.	The Proposed Development satisfies policy IND3 through considering itself against the design requirements of the other policies of the LDP2017 that are relevant and satisfying their various requirements.
Policy RES11: Residential Amenity	Policy RES11 requires development proposals to not compromise the amenity and characteristics of residential areas, protecting said areas from potentially damaging developments. Established residential properties will have come	The Proposed Development is in accordance with policy RES11 as it has been designed to locate the proposed green hydrogen processing facility as far away from residential properties as possible. All



Policy/Guidance	Overview and Objectives	Response
	to expect a certain level of residential amenity that new developments should not compromise.	elements of the Proposed Development have also been carefully sited to sit within the landscape and have been designed, in terms of their size, scale and appearance, to blend in with the landscape as much as possible.
Policy RE1: Renewable Energy Developments	Policy RE1 is an overarching policy for renewable energy developments. The policy establishes the criteria in Schedule 1: Renewable Energy Assessment Criteria, which is a set of criteria all renewable energy development proposals must comply with. It also stresses the importance for renewable energy development proposals are appropriate to their surroundings.	The Proposed Development conforms with policy RE1 by being an energy development that satisfies the criteria of Schedule 1 through being well designed in terms of its size, scale, siting, and appearance, ensuring the Proposed Development has reduced its potential effects on its surroundings as much as possible.
Policy T1: Transportation Requirements for New Development	Policy T1 requires development proposals to satisfy the requirements of the Ayrshire Roads Alliance and align with any Regional and Local Transport Strategies. Development proposals are required to demonstrate that their development would be accessible, preferably by sustainable and active means.	The East Ayrshire Local Transport Strategy 2009 – 2014 is the most recent strategy and the Proposed Development has been designed to accord with its aims, objectives, and vision. Whilst no access is included as part of the Proposed Development, it would make use of the access proposed in the S36 application, ensuring as little new infrastructure needs to be implemented into the area as possible and keeping the Proposed Development more sustainable.
Policy ENV8: Protection and Enhancing the Landscape	This policy affords protection to the landscapes of East Ayrshire and even seeks to see the enhancement of East Ayrshire's landscapes over the lifetime of the LDP. The policy requires development proposals to be well designed and of a size, scale and layout that is in accordance with the landscape character the site is located within. The policy notes that the finishing's, colours and materials used in developments is also of considerable importance and such aspects of development should be carefully considered to ensure development proposals mitigate and reduce their potential effects on landscapes and their characteristics as much as possible. The policy highlights the following important landscape features that should be conserved and considered in development proposals: "Settings of settlements and buildings within the landscape; Skylines, distinctive landforms features, landmark hills and prominent views; Woodlands, hedgerows and trees; Field patterns and means of enclosure, including dry stone dykes; and Rights of way and footpaths."	The Proposed Development is in accordance with policy ENV8 due to it being designed in a manner that compliments and reduces its potential effects on the landscape. This has been achieved through the elements of the Proposed Development being small in scale and size and through its layout being compact, ensuring as little land take as possible. The Proposed Development has also been sited to ensure it minimises its potential affects on surrounding receptors a much as possible.

3.4 Consultation

A non-statutory virtual public consultation exercise was conducted as part of the pre-application activities with the purpose of gaining public comment regarding the Proposed Development (as



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well as the wider Project). While some comments arising from the consultation have been considered by the applicant and adopted within the broader Project where possible, it is notable that no design specific comments were made regarding the green hydrogen production facility. Given the limited number of responses (2 in total) and the lack of comments regarding design, it has not been possible for the applicant to address public views on design related matters. Furthermore, during non-statutory consultation with East Ayrshire Council and identified consultees, no comments or feedback were given on design. This is primarily due to the limited design interventions possible for a development of this type. This notwithstanding, the applicant has sought to consider public amenity within the design and siting of the Proposed Development as addressed within this report.

A copy of the non-statutory public consultation report is provided alongside this DS in support of the planning application and can be referred to as document reference 43122-WOOD-XX-01-RO-T-0001_S1_R1.

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4. Summary

- Various economic, technical and environmental factors were all considered in the iterative design process for the Proposed Development primarily in relation to its siting and the size of the overall Site, rather than on the appearance of the Proposed Development where there is extremely limited opportunity to alter the infrastructure requirements necessary to deliver the scheme. These factors were informed through a variety of baseline surveys, consultation with a range of stakeholders including the ECU, EAC and NatureScot.
- The final design takes account of both desk-based and site-based surveys as well as consultation, and is considered that the Proposed Development meets the balance of delivering a green hydrogen production facility within the Site whilst minimising the introduction of new environmental effects.

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