


**INVERNESS COMMON GOOD FUND**

**REPRESENTATIONS AND RESPONSES ON THE PROPOSAL TO DISPOSE, BY LEASE AND CHANGE THE USE OF AN AREA OF UNDEVELOPED LAND AT THE FORMER LANDFILL SITE, EAST LONGMAN FOR THE DEVELOPMENT OF A GREEN HYDROGEN PRODUCTION FACILITY.**

CONSULTATION PERIOD 20 May – 15 July 2025

Ref	Representations received reproduced verbatim	Responses
1	<p>Hello</p> <p>I would like this to be considered my return for consultation on: <b>Area of undeveloped land at the former landfill site at East Longman, Inverness IV1 1AL</b></p> <p>The product and distribution of hydrogen comes with very serious risks, and while it may appear that this is safe area, I have concerns at its proximity to the A9 and the distribution of hydrogen by road.</p> <p>Security of the site: hydrogen storage would be attractive to terrorist</p> <p>This site is often overflowing by aircraft, be it coast guard, hospitals traffic or commercial passenger planes for the airport, any incident involving an aircraft and the proposed facility would be significant.</p> <p>I also consider that area of land to have great potential for tourism and recreational use once restrictions are lift, which would have greater benefit to the residents of Inverness.</p> <p>Any Hydrogen facility should be located in a remote location preferable near railway lines so the transportation can be moved by rail and not road, or at a port like Nigg or Ardisia.</p> <p>The green energy required for production would not be available directly at the proposed site, so I don't see the need for it to built in the city of Inverness.</p> <p><b>I oppose the idea.</b></p>	<p>All representations are noted and will be considered during the decision-making process. The following responses have been categorised into themes as several representations raise similar points and concerns:</p> <p><b>A. Site Selection</b></p> <p>Storegga carried out an extensive site search to determine the most suitable site. This site was chosen due to the proximity of the potential demand/out-take for the hydrogen energy.</p> <p><b>B. Technology Selection</b></p> <p>Green Hydrogen was selected for this site due to its unique ability to directly serve major off takers in Inverness, positioning it as one of the most strategically significant opportunities in the Highlands. The Longman site is one of the few locations with potential to blend green hydrogen directly into the existing gas network, while also being ideally placed to support vehicle refuelling infrastructure for both road and rail transport. Its proximity to two of the city's largest potential consumers creates a direct and bankable route to market, ensuring early demand certainty. Despite the recognised challenges in establishing first-generation hydrogen projects, green hydrogen remains a vital tool for large-scale decarbonisation. With grid constraints already limiting the pace of electrification across the Inverness area, Longman offered the most credible pathway to deliver hydrogen production at scale within the city boundary, linking clean generation to end users in a way that accelerates transition, strengthens resilience, and supports future investment.</p> <p><b>B.1) Why not pursuing a hydrogen from waste facility and why not pursuing an incinerator / energy from waste facility:</b></p> <p>The Council assessed the viability of developing waste treatment facilities at the site in 2024 (which considered various waste treatment options). A copy of the report of the outcome of this assessment can be found at the following location (item 11) <a href="#">Communities and Place Committee   The Highland Council</a></p> <p><b>C. Grid Constraint</b></p> <p>The National Energy System Operator (NESO) determine the methodology for securing electricity grid connections, with regulatory oversight provided by OFGEM.</p> <p><b>D. Land Use</b></p> <p>The total area of the site has historically been utilised as a landfill, but this activity has now ceased,</p>
2	<p>Hi,</p> <p>I am opposed to this change of land use creating more development. This area should be protected and created into a nature reserve with an access route through it for the general public to therefore also help support people's health and well-being.</p> <p>The council should support the actual businesses on the ongman to decarbonise, not create a separate business. This is green washing at its finest. We are in an environmental crisis, and yet government and local government continue to build on green space until none is left.</p> <p>Please draw a line in the gorse and protect this area from development and enhance wildlife here.</p> <p><b>Additional comments</b></p> <p>Can I add further concerns to this suggested development which I have subsequently discovered.</p> <p>1) it's position would interfere with an active travel planned route through this area.</p> <p>2) with the predicted sea level rise it would be a silly place to site this development as could be underwater by 2050 looking at SEPA's predictions.</p>	<p><b>B.1) Why not pursuing a hydrogen from waste facility and why not pursuing an incinerator / energy from waste facility:</b></p> <p>The Council assessed the viability of developing waste treatment facilities at the site in 2024 (which considered various waste treatment options). A copy of the report of the outcome of this assessment can be found at the following location (item 11) <a href="#">Communities and Place Committee   The Highland Council</a></p> <p><b>C. Grid Constraint</b></p> <p>The National Energy System Operator (NESO) determine the methodology for securing electricity grid connections, with regulatory oversight provided by OFGEM.</p> <p><b>D. Land Use</b></p> <p>The total area of the site has historically been utilised as a landfill, but this activity has now ceased,</p>

3	<p>Hi,</p> <p>I have read the proposal for the change of use of the former landfill site.</p> <p>In general, I am in favour of this, however:</p> <ol style="list-style-type: none"> <li>1. Has there been a recent methane assessment from the landfill site</li> <li>2. Is there a possibility of placing in the application an extension of a path from the railway bridge beyond the remains of the old toll house out towards the stadium?</li> <li>3. A walking trail along the foreshore would allow people to watch the dolphins and enhance the area</li> </ol>	<p>with allowance for continued waste transfer operations. The oldest part of the landfill site was partially surrendered in 2022 to allow its further development as it was deemed sufficiently stable. The remaining area of the landfill site has waste emplaced within in it from the more recent past and therefore at the current time is not deemed suitable to be delicensed. This element of the site remains under a Waste Management Licence which limits activities to those associated operations of the site as a waste transfer station and former landfill (so there is hence a limited remit to use the site for other purposes). Further areas will only be authorised by the regulatory body, the Scottish Environment Protection Agency (SEPA), to be surrendered when associated landfill activity at the site has reduced to an acceptable level (e.g. methane production, land settlement). The Council undertakes monitoring of the landfill site which is reported to SEPA as part of its overall statutory monitoring requirements (this includes the methane being generated and being utilised to generate electricity). Given the current activity on the site, it is not expected that areas where more recent waste deposition was undertaken would be considered suitable for further partial surrender in the short to medium-long term.</p> <p><b>D.1) Planned use of the Longman site and are there long term plans for the site:</b></p> <p>For other uses such as nature reserve, recreational site, businesses and housing, the very high remediation costs to the whole area makes alternative uses currently unviable. Leisure uses – including recreational uses – are likely to be a non-starter for the site given that it is still emitting landfill gas. SEPA appears content to allow it to be used for industrial uses/energy uses where there is controlled access.</p> <p><b>D.2) Letting other areas of the site out to local businesses:</b></p> <p>At the moment there are no other plans to release the remaining site for new commercial lets. The issue is that most of the land is still held under a SEPA license because of the landfill. The site is still being monitored for contamination and there are no timescales how long this will continue. In order to develop the site if and when the site is de-licensed, it will need to be remediated first before wider future land use can be considered. It would involve high costs to progress this work.</p> <p><b>D.3) Why further land cannot be released:</b></p> <p>The site proposed for development by Storegga is within the boundary of the former landfill site, and within an area which was delicensed by SEPA in 2022 following a request by the Highland Council on the basis of funding being available through the City Region Deal to carry out the necessary remediation works.</p> <p><b>D.4) Will development of the hydrogen production facility preclude use of other parts of the site</b></p> <p>Proposed development of other areas of the Longman site would need to consider all factors, including access to the site, existence of the SEPA landfill licence, adjacent infrastructure, safety, security and environmental considerations. Potential future developments would need to consider the specific characteristics of the hydrogen production facility in their planning. The major obstacle to using other parts of the site are the abnormal site remediation costs.</p> <p><b>D.5) Why land adjacent to A9 cannot be released:</b></p> <p>Given the land composition within the former landfill site, significant work is required to remediate the land in preparation for development. The Highland Council identified an area of land for remediation, securing £10 million for remediation works via City Region Deal funding. Whilst additional land could potentially be developed, consideration must be given to the cost of delivering the remediation works, together with access routes and the existence of buried utilities. The land adjacent to the A9 has 2 major pipes which would require to be relocated. The cost of relocation of the pipes and remediation works have effectively sterilised this land until significant</p>
4	<p>Dear Sirs</p> <p>I would like you to consider the following points.</p> <p>Whilst I am not against the development of a green hydrogen production facility, is this the right location?</p> <p>Businesses in the Highlands have been crying out for more commercial and industrial land for years. There is a real shortage, which is holding back the prosperity of the area. This was even before the green port announcement.</p> <p>The promised prosperity of the Highlands (HIE’s £100Billion opportunity), will need locations for businesses to establish and flourish, people will need jobs. Can we not release large areas of land at the landfill for local businesses to secure and develop? I for one have 2 businesses employing 40 people. If I could secure 1 acre each for them I would.</p> <p>Do you intend to open land out to the local business community?</p> <p>Are there any safety risks? Could this development not be placed at the other end of the landfill strip, nearer the railway bridge, away from other businesses?</p> <p>Also, if / when this whole area is further developed, the location suggested will be a prime location, being close to the main access point to the area. Do they need to be so close, could you not reserve the prime locations for more high traffic businesses. Also retaining additional value for the Common Good Fund.</p> <p><b>Additional comments:</b></p> <p>Thank you for coming back to me, although the news is a little disappointing.</p> <p>As you will be aware there is significant pent up demand for commercial property in Inverness, and I have to admit, I am conflicted by the Storegga Hydrogen project. It would be amazing for the Highlands to be leading the way on clean energy, especially with a re-fuelling location so well placed for major transport routes. However, there are many local businesses struggling for commercial space, and rent and land prices are becoming prohibitive, holding the Highlands back.</p> <p>I do wonder how it is possible to release this land, but not more?</p> <p>Also, that this site didn’t seem to touch the A9, could land along there be released?</p> <p>It would be interesting to explore how more land could be released from the landfill, and perhaps develop a 5 and 10 year plan to make this happen. That land is a fantastic asset and resource for the community, I would love to see it move forward.</p> <p>Anyway, thanks again for your reply, I am not expecting a further response.</p> <p>Please add my comments to the consultation.</p>	

5	<p>I think it might be better to focus on Battery technology instead of Hydrogen, there is some info below.</p> <p>I thought this was a nice 13 min overview of the advantages / disadvantages of using Hydrogen or Batteries for energy storage. It's for cars, but I think the same Physics applies to other applications. I think the main issue with Hydrogen is efficiency, which is about 25-35% (and I think unlikely to improve), when a battery can be 70-90%: <a href="https://www.youtube.com/watch?v=dWAO3vUn7nw">https://www.youtube.com/watch?v=dWAO3vUn7nw</a></p> <p>I thought David Mackay also wrote about this well: <a href="https://www.withouthotair.com/c20/page_129.shtml">https://www.withouthotair.com/c20/page_129.shtml</a></p> <p><i>"If our task were "please stop using fossil fuels for transport, allowing yourself the assumption that infinite quantities of green electricity are available for free," then of course an energy-profligate transport solution like hydrogen might be a contender (though hydrogen faces other problems). But green electricity is not free. Indeed, getting green electricity on the scale of our current consumption is going to be very challenging. The fossil fuel challenge is an energy challenge. The climate-change problem is an energy problem. We need to focus on solutions that use less energy, not "solutions" that use more!"</i></p> <p><b>Additional comments:</b> I think I am against the proposal as although Hydrogen might be important for some applications, it's very inefficient to produce and we don't have a large excess of cheap clean electricity at the moment. I think efforts would be better focused on using batteries to store any spare electricity</p>	<p>funds can be identified to carry out the works.</p> <p><b>D.6) THC's specific plans for tourism and recreational use including walking and cycling path/active travel:</b> The site is a licensed SEPA site and would require surrender of license and necessary remediation works before any tourism and recreational use could be considered. The high cost of the remediation works required for this use class would make such proposals highly unlikely without huge levels of public subsidy. The Waste Management Licence requires the Council ensure that boundary remains secure from general or unauthorised access. Therefore, a cycleway, walking path or general recreation area within the licenced area would not be currently feasible.</p> <p><b>D.7) Development of a strategic plan to enhance biodiversity, green space and public access across the wider Crown area:</b> At this stage, there are no strategic plans in relation to this specific area. The service has/is progressing with a number of initiatives, including having undertaken a green space audit (to informed areas of green space that should be protected within the development plan) and a biodiversity strategy on how green spaces could be enhanced – both of which are at a wider scale. We are preparing the Local Transport Strategy which will include specific Active Travel requirements. This is unlikely to consider proposals at Longman. Public access through the existing Longman site is unlikely to be acceptable while it is still a licensed site.</p> <p><b>D.8) Comment on any plans for a Longman Landfill Development Brief (per IMFLDP2 stated requirement):</b> There is no current intention to progress a Longman Landfill Development Brief because the land has more limited development potential than previously envisaged when the Inner Moray Firth Local Development Plan 2 was prepared. The A9/A82 junction improvement scheme, which would have enhanced the capacity of the road access to the site is now far less likely to proceed given changes in the Inverness and Highland City Region Deal. Also, SEPA has proven reluctant to endorse a wide range of development on the land which remains part of the still licensed landfill site and therefore its range of acceptable uses and development potential has been curtailed. Development briefs are usually prepared for land with significant development potential.</p> <p><b>D.9) Details of active travel route considerations as part of development:</b> As part of the development, Storegga recognise the importance of enhancing active travel routes to support community connectivity, wellbeing, and environmental sustainability. Infrastructure and public services improvements, including active travel enhancements, are being considered within the broader scope of community benefit packages currently under development.</p> <p><b>D.10) Site should be used for the housing of bees:</b> As part of the development, Storegga intends to develop a biodiversity net gain strategy to be carried out over the life of the project. The introduction of species will be considered at the design stage as part of strategy development.</p> <p><b>D.11) Details of land remediation in the event that Storegga leaves the site:</b> The hydrogen facility will be regulated under the Pollution, Prevention and Control (Scotland) Regulations 2012 legislation. As such under this statute the site will be required to meet – Best Available Techniques. In respect to Techniques this includes both the technology used and the way in which an installation is designed, built, maintained, operated and decommissioned. As and when the facility comes to its end of life and hands its permit to operate back to the Regulators (SEPA), the operators will have to demonstrate that the site is remediated back to the original condition</p>
6	<p><b>1. What are your views on the proposed development utilising common good land?</b> I have concerns over whether the demand exists, or will ever exist to justify the loss of common good land for this application. I'm assuming that the development would result in a significant chemical/industrial engineering installation which could impact on access, uses and value of surrounding land, beyond the area leased to the operator. Later in this email I describe why I don't think there is sufficient demand and why I think there is a risk of a grant funded white elephant being built. If the existing restrictions on the use of the land make it unattractive for other developments, then bringing an income to the Common Good Fund is to be welcomed, however, I'm not clear on what the restrictions are and whether this is actually the case. Has use of the land been considered by others or is this the first application?</p> <p>If development of amenity is included within the development of a new facility, then that would be welcome. Conversely, development that would preclude future amenity use would very much not be welcome. For example, Inverness is poorly served by access to the coast (limitations due to a working harbour, roads to the West &amp; rail/road to the East. The area under consideration could potentially be developed for recreational access. Specifically, under proposals for the A96 Green Corridor, document "Draft Paths and Trails in the A96 Corridor (<a href="https://www.highland.gov.uk/downloads/file/17081/draft_paths_and_trails_in_the_a96_corridor_report">https://www.highland.gov.uk/downloads/file/17081/draft_paths_and_trails_in_the_a96_corridor_report</a>) shows an indicative path running through the former landfill site. This indicative path has good potential to link up with core path IN08.23 to create a section of coastal path - a feature sadly lacking in the Inverness area. This would be an ideal use of Common Good land.</p>  <p><b>The A96 Green Framework</b></p> <p>I would hope that any use of the land would be paired with legal obligations (possibly secured with a bond or other secured amount of money) to restore the land to previous condition should the Hydrogen facility be decommissioned or if the operator should go into administration (I think a significant risk given the pace of development in Hydrogen and the uncertainty in demand).</p>	



	<p><b>2. Do you have any views on potential benefits of the proposal?</b> If amenity access or coastal path development was to be tied to the proposal, I would welcome it. Should no other users for the land be identified, I would welcome the potential for income to be brought into the Common Good Fund.</p> <p><b>3. Do you have any issues or concerns arising from the proposal?</b> I have some concerns over the viability of large scale Hydrogen production primarily relating to uncertainty &amp; risk on the demand side; if the facility is built speculatively, will there ever be the demand to justify its existence or will it become a white elephant? Whilst Hydrogen has been touted as a Swiss army knife for decarbonisation, the appropriate use cases for it are more limited. In many, many cases electrification is a far more effective route to decarbonisation. With the exception of specific high temperature industrial uses (in particular steelmaking), the thermodynamic limitations and practical challenges of manufacturing, storing &amp; transporting Hydrogen make electrification &amp; heat pumps a far more attractive choice.</p> <p>Likewise for transport, the incredible surge in EVs has shown that Hydrogen powered transportation is not a sensible choice except for again some niche uses such as long-haul shipping. Around the globe, hydrogen fuelled bus projects are being cancelled; UK hydrogen home heating pilots are being delayed or cancelled. Additionally, I note some recent stories around Hydrogen production facilities in the middle east struggling to find buyers for the Hydrogen they produce - <a href="https://saudienergyconsulting.com/insights/articles/saudi-hydrogen-energy-advisory-demand-rises-amid-8-4b-project-uncertainty">https://saudienergyconsulting.com/insights/articles/saudi-hydrogen-energy-advisory-demand-rises-amid-8-4b-project-uncertainty</a>. I appreciate that co-development of Hydrogen production and the growth of industrial users is a challenge and production may need to lead the demand side however it's worth noting the challenges and concerns of those who have already taken the step into production.</p> <p>I don't believe use of Hydrogen for domestic heating, or land transport is an appropriate use case. If the proposed facility uses these use cases to justify demand I would seriously question it and would oppose the development. Michael Liebrich has produced what he's titled a "Hydrogen Ladder" which shows the use cases to which Hydrogen is best suited, the higher up the ladder, the better the use. Additionally the ladder identifies which fuel source which he assesses to be the most appropriate alternative. The Hydrogen ladder has now been peer-reviewed and published by Nature: <a href="https://www.nature.com/articles/s44359-025-00050-4">https://www.nature.com/articles/s44359-025-00050-4</a> Johnson, N., Liebreich, M., Kammen, D.M. et al. Realistic roles for hydrogen in the future energy transition. Nat. Rev. Clean Technol. 1, 351–371 (2025).</p> <p>In its original form, it was a LinkedIn post (now at version 5.0): <a href="https://www.linkedin.com/pulse/hydrogen-ladder-version-50-michael-liebreich/">https://www.linkedin.com/pulse/hydrogen-ladder-version-50-michael-liebreich/</a></p> <p>The use cases on the top rungs of the ladder are the only ones I think should be targeted. I would expect the proposed operator to demonstrate why there is insufficient Hydrogen capacity (assuming their Cromarty/Nigg developments happen), who the specific customers might be for Hydrogen produced at this new facility and what their use cases are.</p> <p>With uncertainty in Hydrogen demand &amp; economics, I would expect the developer to have obligations upon them relating to restoration of the site should it be closed or should they fall into administration, perhaps through a bond or other security.</p> <p><b>4. Do you have any additional comments?</b> Climate change is very real and needs to be addressed, however that doesn't justify rushing into inappropriate developments. I'm not clear that this additional Hydrogen facility is required (given the other developments in the Highlands) and would be cautious in giving up land held for the good of the community. If it is to be leased, I would expect some community benefit or development to be tied to it - a coastal path for cycling/walking being an ideal case (maybe even tying in with the Harbour Maritime Heritage trail)</p>	<p>that it was first established (i.e., a serviced platform). During the lifetime of the facility appropriate assessments will be required to be undertaken to ensure any net change (deterioration) is remediated.</p> <p><b>E. Demand</b></p> <p><b>E.1) Demand for hydrogen in the local area, and how this demand will be met using the facility at Longman:</b> As outlined in the common good consultation document, the Development is expected to produce approximately 6,400 tonnes of electrolytic hydrogen annually, with the majority of this supply intended to meet the energy demands of Baird’s Maltings. While Baird’s Malt has considered electrification of its malting operations, this is currently not economically viable due to several key factors:</p> <ul style="list-style-type: none"> <li>• <b>Recent infrastructure upgrades</b> at the Inverness plant were specifically designed for natural gas combustion. These systems require only minor modifications to operate with 100% hydrogen, making hydrogen a more practical and cost-effective decarbonisation pathway.</li> <li>• <b>The kilning process</b> in malting requires high thermal loads and precise control over temperature and humidity, conditions that are challenging to replicate using electric systems at the required industrial scale.</li> <li>• <b>Electrical grid constraints</b> in Inverness presents a significant barrier. The local grid is highly constrained, and securing a sufficient electrical connection would involve substantial cost and long lead times, further reducing the feasibility of electrification. Given these considerations, Baird’s Malt is pursuing hydrogen as a more suitable alternative to support its decarbonisation goals, while continuing to explore other sustainability measures across its operations.</li> </ul> <p><b>E.2) Why the demand could not be met by other hydrogen developments:</b> At present, there are no known hydrogen developments capable of supplying the volume and reliability of hydrogen required by Baird’s Malt. Even if such developments were available, meeting the demand would likely result in significant disruption in the area surrounding the Baird’s Malt plant. This disruption could arise from either:</p> <ul style="list-style-type: none"> <li>• The installation of an extensive hydrogen pipeline from outside Inverness, which would involve complex engineering works and potential impacts on local infrastructure; or</li> <li>• A substantial increase in tube trailer traffic to facilitate hydrogen haulage, which would place additional pressure on local roads and logistics networks.</li> </ul> <p>Given these challenges, sourcing hydrogen from other developments is not considered a practical or sustainable solution. The proposed development offers a local, dedicated supply that aligns with Baird’s operational needs and minimises wider community impact.</p> <p><b>F. Hydrogen Development</b> While a hydrogen fuelling station would represent a valuable opportunity to support the wider development and promote low-carbon transport, there are currently no plans to construct a mobility hub during this phase of the project. Future phases may revisit this opportunity as part of</p>
7	<p>Hello,</p> <p>I want this proposal to go ahead for the economic benefit of Inverness and the jobs it will bring as I believe in green (and only green!) hydrogen. It would make me more proud to live here if this was a success.</p> <p>However, I caveat that I don't want the potential for the whole area to be eventually accessible for the public to be lost to this and it forever</p>	

	<p>becoming a big, no access industrial site. I beg that an active travel (accessible for cycling, walking and wheeling and fully segregated from motorised traffic) route, ideally along the actual waterfront, be designed into the proposal. Quite a few groups have done some work on this, including Inverness Waterfront Group.</p> <p>In this spirit of 'common good', I think there should also be a park with access for residents as well as workers in the facility. There's not a lot of parks in the city and if you had a park and active travel route here then this would be a resource that would support residents' (and importantly Raigmore staff!) mental, physical, and social health opportunities, i.e. things that benefit the residents directly and in their daily life. This would also bring tourism benefits.</p> <p>If you were really visionary then it would be amazing to include a hydrogen-fuelled mobility hub/demonstration project. I'm not sure what 'transportation facilities' entails.</p>	<p>broader infrastructure and community benefit considerations. Future phases would be subject to their own planning consultation and application process.</p> <p><b>G. Local Employment</b></p> <p>Our development will create opportunities for suppliers based in Inverness and across Scotland to participate in a wide range of activities, including research and development, design, project management, civil engineering, component fabrication and manufacturing, installation, and ongoing maintenance.</p> <p>We are committed to prioritising local suppliers wherever possible and will actively engage with local educational institutions to identify and address skills gaps relevant to the growing hydrogen sector. The region's legacy of expertise in oil and gas presents a valuable foundation, and we aim to build on this to support a just transition, ensuring that local communities benefit from the shift to a low-carbon economy.</p>
8	<p>Hello,</p> <p>I hope you are well. I am writing to discuss the potential use of the old landfill site for constructing a hydrogen plant. As we explore this option, I have a few questions to ensure we make the most intelligent and informed decisions.</p> <p>Firstly, would the hydrogen plant require an exclusion zone? If so, could you please elaborate on what that would entail? Understanding the specifics of the location on the site is crucial, so I would appreciate any details on where exactly this plant would be situated.</p> <p>Regarding environmental impact, what effect would this project have on the shoreline? Additionally, would a sea link terminal be necessary for the plant's operation? Given the volatile nature of hydrogen, it is essential to know what safeguards would be in place to ensure safety and stability.</p> <p>I am also interested in understanding the broader benefits of this project. How would this hydrogen plant benefit Inverness or the Highland Council? Lastly, are there any other proposals that have been made for the land use? It would be helpful to know if there are alternative plans or projects under consideration.</p> <p>Thank you for your attention to these queries. I look forward to your response and any information you can provide.</p> <p><u>Additional comments</u></p> <p>Thank you for the comprehensive response to my questions; it is very appreciated. The Inner Moray Firth development plan is a document that I would contest every time as I believe it is an ineffective document and is used to meet government strategy.</p> <p>Any proposals to increase industry and workforce in the Highlands is the best way for the area. Done in the most logical and safest way possible as our infrastructure is at breaking point and not designed for current or future traffic volume and energy demands.</p> <p>The brown area has been a desperate waste of area, but this seems a good way forward.</p> <p>Regards</p>	<p><b>H. Community Benefit</b></p> <p>Storegga is committed to ensuring our projects deliver meaningful and lasting benefits to local communities, in line with the Highland Council's Social Values Charter.</p> <p>Through the Longman Hydrogen development, we will prioritise local suppliers and work closely with education and skills agencies to support training, apprenticeships, and STEM engagement. We are developing a strategy, collaborating with schools and colleges to create opportunities for young people, including potential mentoring and work experience.</p> <p>Our Community Wealth Building Plan will focus on delivering economic, educational, environmental, and social value, ensuring that local voices help shape the outcomes. We continue to work with Highland Council and other stakeholders to develop community benefit packages that reflect local priorities and support a just transition.</p> <p><b>I. Revenue to Highland Council</b></p> <p>The Inverness Common Good Fund will receive rental income representing market rates. Prior to commencement of the Lease, the Highland Council would also receive an annual Option to Lease Fee, from the date of execution of the Option to Lease, until commencement of the Lease. Any further revenue is subject to confirmation by the UK Government, that can be considered an eligible cost through the Hydrogen Allocation Rounds.</p> <p><b>J. Environmental Protection</b></p> <p>Storegga is committed to meeting all environmental obligations and will follow the Highland Council's planning requirements, including full engagement with statutory consultees such as SEPA and NatureScot.</p> <p>An Environmental Impact Assessment (EIA) will be completed as part of the planning process. Preliminary assessments indicate that noise levels and other environmental impacts are not expected to be significant. The site will be designed using Best Available Techniques (BAT) to minimise emissions to air, land, and water.</p> <p>During construction and operation, strict controls will be in place to prevent pollution. These include high-emission standard equipment, minimised chemical use, water reuse systems, and containment measures to protect local waterways. A full noise impact assessment will also be required before a Pollution Prevention and Control (PPC) permit is granted.</p> <p>Protecting local species and habitats is a priority. All activities will comply with relevant environmental legislation and be subject to ongoing monitoring throughout the project lifecycle. The planning application submitted by the Council for the remediation phase has been scrutinised</p>
9	<p>Dear sir/madam,</p> <p>I have just come across the link for this proposal and would make the following comments.</p> <p>The proposal would seem to have potential merits in the drive to make more use of hydrogen technology for industrial and transport uses. My only concern is that the siting does nothing to prevent the use of parts of the old longman landfill site being used to construct a cycle/footpath joining stadium road to the old shore road. This would provide a superb off road route from the city centre to smithton,Culloden and Balloch. I have raised the possibility of this many times in recent years and keep getting told site is not fit for such public access due to legacy issues from the former landfill site.</p> <p>Does this proposal now clear the way for such a path to be planned and constructed?</p>	
10	<p>Would it not be more beneficial to use this land to build an incinerator?</p>	



	<p>Access to this land has been requested to keep Bees on it on a small area would be required. It would be beneficial yet it's been declined.</p> <p>Regards,</p> <p><u>Additional comments:</u> I am against the proposal as the company is £millions in dept and it is simply investment companies speculating on gaining government grants RHI payment etc Far better use for the land would be an incinerator which would reduce the carbon footprint of taking waste miles away for disposal.</p>	<p>during the planning process and approved. That planning application considers impact on existing protected species in the site who will be impacted by the site clearance.</p> <p><b>K. Flood Risk</b> A flood risk assessment was carried out as part of the planning application of the site for the remediation phase. The present unprepared site is in an area with no risk from rivers or coastal flooding with a small chance of pockets of flooding from surface water. The site will be designed to take into account climate change and adapted accordingly to provide resilience to protect the facility from any ingress of water. This will also ensure any surface water will not impact on surrounding areas with a separate dedicated system to remove surface water from the site to prevent impact on the surrounding areas and infrastructure. This dedicated drainage system will be integrated into the serviced platform design that will be constructed by the Highland Council.</p> <p><b>L. Safety</b> Storegga is committed to ensuring the safety of all road users, including those on the A9, throughout the development and operation of the Longman Hydrogen facility. Hydrogen production, storage, and transport are governed by strict regulations, and we will fully comply with all relevant safety standards. While initial plans considered road transport via HGV-hauled tube trailers, the current delivery strategy involves a private hydrogen pipeline, significantly reducing road traffic and associated safety risks. The site access has been carefully designed to accommodate safe vehicle movements and meets all required road safety standards. We continue to work closely with Transport Scotland to ensure appropriate mitigation measures are in place and to support broader road safety improvements.  There are no intended interactions with the aviation industry at this time.</p> <p><b>M. Security</b> Storegga will follow all standard health and safety guidelines applicable to onshore hydrogen production facilities, including robust security measures to protect the site from potential threats, including terrorism and other nefarious activity.  The site will be secured through a combination of physical barriers, controlled access points, surveillance systems, and 24/7 monitoring. Access will be strictly limited to authorised personnel, and all operations will comply with national security protocols and industry best practices.  As a lower tier COMAH site the project will be bound by complying with the security and emergency response criteria for COMAH sites and the Pipeline Safety Regulations, signed off by the Health &amp; Safety Executive prior to start up.  This includes the Highland Council having an emergency response plan in place for the pipeline as well as the developer.  Storegga will work closely with relevant authorities and emergency services to ensure that risk assessments are regularly updated and that appropriate response plans are in place. Security measures will be reviewed throughout the lifecycle of the project to ensure ongoing protection of the facility, its personnel, and the surrounding community.</p>
11	<p><b>Port of Inverness</b></p> <p>1. What are your views on the proposed development utilising common good land? The PoI is generally supportive of productive use of strategic land on the East Longman site covered by this consultation. We are pleased to see future fuel production on the site as a useful component in the industrial strategy for not only the immediate surrounding area but the wider Highland Region.</p> <p>2. Do you have any views on potential benefits of the proposal? The potential benefit and of relevance to PoI is the use of green hydrogen in methanol blending for the next generation marine fuels. This potential output aligns closely with the Port's ambitions to host R&amp;D and test activity, and to enable early adoption of next generation marine fuels in Port operations.</p> <p>3. Do you have any issues or concerns arising from the proposal? We would be concerned if the high energy requirements for the production of hydrogen by electrolysis, as proposed by Storegga, inhibited grid connections for current and future planned port activity as well as future manufacturing within the Port estate. PoI would like to see waste to hydrogen considered in addition, given that this addresses and offers a potential solution to the relatively low level of recycling in the Highland Council area and could make use of land already designated for waste handling. This has the potential to be more immediately deliverable as it does not depend on new energy generation from offshore resources.</p> <p>4. Do you have any additional comments? The Port would like reassurance that the proposed use of part of the area for this use would not inhibit/restrict other uses around it on the remainder of the site. If there will be limitations arising from the proposed use, then can we please receive further information in order to consider implications for Port operations and future development plans.</p>	
12	<p><b>Crown &amp; City Centre Community Council</b></p> <p>Crown &amp; City Centre Community Council acknowledges the importance of developing clean energy infrastructure and welcomes the opportunity to comment on the proposed lease of Common Good land at East Longman for a green hydrogen production facility.</p> <p>We recognise that this project aligns with national climate ambitions and has the potential to bring long-term environmental and economic value to Inverness. However, as this development involves the use of Inverness Common Good land, we believe the Council has a legal and moral duty to ensure that any such disposal:</p> <ol style="list-style-type: none"> <li>1. Delivers fair market value for the asset</li> <li>2. Returns long-term financial benefit to the people of Inverness</li> <li>3. Is managed transparently and in the public interest</li> </ol> <p><b>Community Wealth Sharing and Revenue Models</b> We strongly urge Highland Council to adopt a community benefit model like the approach currently being explored for the Torvean Battery Energy Storage System (BESS), where the Council is investigating revenue-based income potential via a Special Purpose Vehicle (SPV).</p> <p><b>Revenue Potential Analysis</b> The financial scale of this project is substantial, and councillors should understand the monetary values involved. Based on current market data:</p> <p><i>Annual Revenue Potential:</i></p> <p>Current green hydrogen prices range from £2.60 to £6.10 per kilogram, with 6,400 tonnes (6.4 million kg) annual production, this generates:</p> <ul style="list-style-type: none"> <li>• Conservative estimate: £16.6 million annually</li> </ul>	

<ul style="list-style-type: none"> <li>• Mid-range estimate: £27.5 million annually</li> <li>• Higher estimate: £39.0 million annually</li> </ul> <p><i>20-Year Project Value:</i></p> <ul style="list-style-type: none"> <li>• Conservative (£2.60/kg): £332 million total</li> <li>• Mid-range (£4.30/kg): £550 million total</li> <li>• Higher (£6.10/kg): £780 million total</li> </ul> <p><i>Community Benefit Potential:</i></p> <p>Even a modest 5% revenue share would deliver:</p> <ul style="list-style-type: none"> <li>• £1.4 million annually to the Common Good Fund (mid-range scenario)</li> <li>• £28 million over the 20-year lease (potentially £56 million with extensions)</li> </ul> <p>This represents 20-30 times more value than traditional fixed industrial lease arrangements, which typically yield £50,000-£100,000 annually for comparable sites.</p> <p>We believe a percentage-based return (e.g. 5-10% of gross revenue or margin) would offer a fair and proportionate contribution to the Inverness Common Good Fund, significantly exceeding traditional fixed-lease approaches. This aligns with Scottish Government guidance on shared revenue models where communities buy an interest in the revenue stream while developers retain ownership.</p> <p><b>Implementation Framework</b></p> <p>If an SPV or other delivery mechanism is proposed:</p> <ol style="list-style-type: none"> <li>1. The community must be assured that all financial returns from the use of Common Good land are ringfenced for the Common Good Fund</li> <li>2. Community stakeholders should be given transparency and oversight of any such arrangement</li> <li>3. Any agreement must include legally binding commitments to public benefit and accountability</li> <li>4. Regular reviews should be built into the arrangement to ensure ongoing fair value</li> </ol> <p><b>Policy Context</b></p> <p>This approach would align with Scotland's Just Transition principles, which emphasise that local and community energy projects should provide "new revenue streams for local areas" and ensure "maximum value is retained locally". The Scottish Government's ambition is "to encourage the renewables industry to consider, explore and offer shared ownership opportunities as standard on all new renewable energy projects".</p> <p><b>Transportation Infrastructure and Safety Concerns</b></p> <p><b>Hydrogen Transportation Methods</b></p> <p>While the consultation document mentions hydrogen supply to various users, it lacks detail on transportation methods and routes. Research indicates hydrogen can be transported as:</p> <ul style="list-style-type: none"> <li>• Compressed gas in high-pressure tubes (250-700 bar)</li> <li>• Liquid hydrogen at cryogenic temperatures (-253°C)</li> <li>• Ammonia (NH<sub>3</sub>) as a hydrogen carrier requiring conversion back to hydrogen</li> <li>• Pipeline networks for large-scale distribution</li> </ul> <p><b>Infrastructure Impact on A9 and Local Roads</b></p> <p>The A9 corridor is already under significant strain and has documented safety challenges. Transport Scotland has implemented extensive safety measures including average speed cameras and a £5M engineering improvement package specifically to address collision rates.</p> <p>Key Concerns:</p> <ul style="list-style-type: none"> <li>• Heavy goods vehicle movements: Regular hydrogen deliveries via articulated tankers</li> <li>• Specialized transport requirements: High-pressure vessels or cryogenic tanks requiring specialized handling</li> <li>• Emergency response capability: Current emergency services may lack hydrogen-specific training and equipment</li> <li>• Route planning: No indication of designated transport corridors or restrictions</li> </ul> <p><b>Safety and Regulatory Framework</b></p> <p>Currently, there is no single regulatory body responsible for hydrogen projects in the UK, with multiple authorities involved depending on the activity. This fragmented approach raises concerns about:</p> <ul style="list-style-type: none"> <li>• Emergency response protocols for hydrogen incidents</li> <li>• Driver training requirements for specialized hydrogen transport</li> <li>• Road infrastructure adequacy for heavy hydrogen transport vehicles</li> </ul>	<p><b>N. Governance and Transparency</b></p> <p>Highland Council commits to full transparency by complying with the Community Empowerment (Scotland) 2015 Act and section 75 of the Local Government (Scotland) Act 1973 with regards to the disposal and changing the use of common good property. The Council's governance route is per the Scheme of Delegation and reports are publicly available on the Council's website. Other governance procedures include public reporting on financial arrangements, regular monitoring and review of the project's community benefit, and additional consultation in line with other statutory requirements.</p>
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<ul style="list-style-type: none"> <li>Public safety measures along transport routes</li> </ul> <p><b>Environmental Safeguards</b></p> <p><b>Moray Firth</b></p> <p>The proposed site lies on the shores of the Moray Firth, an area of significant environmental sensitivity and marine biodiversity. While the site itself is industrial and has a history as a landfill, its proximity to protected waters requires particular care.</p> <p>We request assurance that:</p> <ul style="list-style-type: none"> <li>A full environmental impact assessment (EIA) has been or will be conducted, particularly in relation to water abstraction and any wastewater discharge</li> <li>Appropriate engagement with SEPA and NatureScot has taken place</li> <li>Strict controls and monitoring are in place to protect the marine environment from pollution, runoff, or industrial disturbance</li> <li>Consideration has been given to cumulative environmental impacts alongside other energy projects in the region</li> </ul> <p><b>Green Space and Strategic Biodiversity Planning</b></p> <p>While the proposed development site is currently industrial in nature, it nonetheless represents a significant loss of green space within the Crown Community Council area. We therefore urge Highland Council, prior to agreeing any lease of Common Good land, to commit to developing a strategic plan to enhance biodiversity, green space, and public access across the wider Crown area. This should include opportunities to link with a future coastal path network and contribute meaningfully to local climate and nature recovery goals. Revenues generated from this lease should be used in part to support such community-led environmental improvements.</p> <p><b>Economic and Social Benefits</b></p> <p>While supporting the project's environmental credentials, we seek assurance that:</p> <p><i>Local Employment</i></p> <ol style="list-style-type: none"> <li>The projected 30+ operational jobs and construction workforce will prioritise local recruitment where possible</li> <li>Skills development and training opportunities are made available to Inverness residents</li> <li>Supply chain opportunities are offered to Highland businesses</li> </ol> <p><i>Energy Security</i></p> <p>Being 'home-made', green hydrogen has clear benefits in terms of security of energy supply and could support Scotland's broader energy transition goals.</p> <p><i>Governance and Transparency</i></p> <p>Given the inalienable status of this Common Good land under the Royal Charter of James VI (1591), we emphasise the need for:</p> <ol style="list-style-type: none"> <li>Full transparency throughout the Sheriff Court consent process</li> <li>Clear public reporting on all financial arrangements</li> <li>Regular monitoring and review of the project's community benefits</li> <li>Meaningful consultation at key project milestones</li> </ol> <p><b>Recommendations</b></p> <p>Crown &amp; City Centre Community Council recommends that Highland Council:</p> <ol style="list-style-type: none"> <li>Negotiate a revenue-sharing agreement that provides meaningful long-term returns to the Common Good Fund, following successful models being explored elsewhere in Scotland</li> <li>Establish robust governance structures including community representation in any SPV or oversight body</li> <li>Ensure comprehensive environmental protection with enforceable conditions and regular monitoring</li> <li>Maximise local economic benefits through employment, training, and supply chain opportunities</li> <li>Create transparent reporting mechanisms to demonstrate ongoing value to Inverness residents</li> </ol> <p><b>Summary Position</b></p> <p>Crown &amp; City Centre Community Council supports the principle of green energy development and recognises the potential contribution of green hydrogen to decarbonisation. However, we believe this project must also be a model of:</p> <ul style="list-style-type: none"> <li>Fair financial return to the people of Inverness through innovative revenue-sharing arrangements</li> </ul>	
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	<ul style="list-style-type: none"> <li>• Transparent governance of Common Good assets with meaningful community oversight</li> <li>• Robust environmental stewardship protecting the sensitive Moray Firth environment</li> <li>• Local economic benefit maximising opportunities for Highland communities</li> </ul> <p>We welcome further engagement with the Council and relevant officers throughout this process and look forward to seeing this project developed as an exemplar of community-centred energy development.</p>	
13	<p>We are grateful for the opportunity as residents to comment.</p> <p>We are supportive of finding a suitable location for the proposed facility in Highland, given the importance of developing new sources of green energy.</p> <p>However, the site proposed is adjacent to the only (often forgotten or unknown) bit of Inverness coastline, with abundant flora and fauna, expansive views down the Moray Firth, and potential for connecting paths and green networks. Consultations on the IMFLDP2 produced numerous responses highlighting the potential to develop this area (also common good land?) once released by SEPA, for recreational / natural heritage use. We are concerned that, while the land proposed for the green hydrogen facility is in an area zoned for business use, it's development, in the absence of a plan for the whole area, could damage the future potential for the adjacent seashore site (marked in green on the map below).</p> <p>There is reference in the IMFLDP2, and the Reporter's comments on it, of the need for a Longman Landfill Development Brief, which would consider the future of the area as a whole. Without it, isolated approval of developments on areas INC09 and INC11 could prejudice options for future access and use of the adjacent seaward site.</p> <p>We are not aware that such a brief has yet been published. We hope the Trustees of the Common Good Fund, given their ownership of the adjacent land, would wish to see and consider it before progressing this proposal any further. Most coastal towns exploit that unique location for the benefit of local residents, and to attract visitors. It would be a tragedy for future generations (and tourists) if that opportunity were lost or diminished in perpetuity in Inverness.</p>  	
14	<p><b>Inverness Waterfront Group of the Association of Northern Trails Scotland</b></p> <p>Hello,</p> <p>The Inverness Waterfront Group (IWG) of the Association of Northern Trails Scotland (ANTS) notes the hydrogen development proposal at East Longman by the Common Good Fund (CGF) and wishes to make the following points:</p> <ul style="list-style-type: none"> <li>- The IWG/ANTS has an interest in the former landfill site as part of the proposed walking/cycling route from Stadium Road along the shoreline to the old A96, as an essential connection for a new coastal route between Inverness and Nairn, linking the Moray Coast Path to the John o'Groats Trail and Great Glen Way. We are very concerned by any development in the area which might impede or block pedestrian &amp; cycle access and would refer GGF to the Reporters' comments on the Inner Moray Firth Local Development Plan 2 (IMFLDP2) about incorporating provision in future proposals. In informal discussions with HIE and members of the Highland Council, IWG has explored the potential economic and social benefits of a coastal route for cyclists and walkers, connecting the communities along the southern shoreline of the Inner Moray Firth, and potentially serving as a green route for Tornagrain and Dalcross.</li> </ul>	

	<p>- While developing greener energy production is in principle welcomed, particularly since it aligns with Highland Council and Scottish Government policies, IWG does have concerns about siting hydrogen gas manufacture, storage and distribution immediately adjacent to the A9 trunk road. The stretch of A9 between the Raigmore Interchange and Longman Roundabout is an arterial transport route with high traffic density. IWG seeks reassurance that the hydrogen development will not present a physical risk to people in the vicinity and that any incident at the proposed plant would not cause closure of the roads, railway, or coastal path.</p> <p>- In the alternative, we propose to develop a combination of park land and nature reserve on this green waterfront site instead of a hydrogen storage facility. We are concerned that a unique site will be wasted on a facility that could be located on any site in the Inverness area with good road connections. Furthermore, park land will be more in keeping with the purpose of common good land as it will benefit the entire public instead of a single leaseholder.</p> <p>- We are also concerned that a valuable waterfront site will be further whittled away by this hydrogen storage proposal without a comprehensive plan in place. We understand a comprehensive plan for the entire former Longman Landfill site has been promised for some time but has yet to be produced.</p> <p>- IWG also has a long-term interest in any proposals which may affect access to the final part of the former landfill site, which is currently not part of IMFLDP2. We would be concerned if the hydrogen development proposal had an impact on this undeveloped area which could, when released by SEPA, be suitable for public amenity or parkland.</p> <p>IWG would welcome an opportunity to meet with CGF representatives to further explore our concerns and find solutions which benefit all parties.</p>	
15	<p><b>Highland Cycle Campaign</b></p> <p>There is a long held ambitions to provide a coastal route for walkers and cyclings from Inverness to Altulie and further to Nairn, which would be supported by the Highland Cycle Campaign. We understand that the restriction on public access has been a significant barrier to progress of this. Any development that takes place on the Longman Landfill should be contingent on improving public access to one of the few coastal green spaces in Inverness and the provision of a strategic corridor to allow for the development of this long distance route, with developer contributions sought to allow funding for the construction of the path.</p> <p>The current cycle route from Inverness to Nairn is indirect and hilly - by car this journey is 16.5 miles with 110m of ascent, whereas along the NCN cycle route it is 23.5 miles with 440m of ascent and we would welcome all efforts to improve connectivity between the two places with a more direct route for cyclists and walkers. From a strategic point of view connecting existing long distance paths (e.g. Great Glen Way, Moray Coastal Route, Dava Way and the John o Groats Trail) will boost sustainable transport and tourism in the Highlands.</p>	