

Pre-Application Consultation Report

Stannergate 132kV Substation and Network Rail

Feeder Station

April 2025

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1. INTRODUCTION

- 1.1.1 This Pre-Application Consultation (PAC) Report is submitted by Scottish Hydro Electric Transmission plc, operating and known as Scottish and Southern Electricity Networks Transmission (SSEN Transmission), as part of an application for full planning permission under the Town and Country Planning (Scotland) Act 1997 (as amended) ('TCPA 1997') for the Stannergate 132kV Substation and Network Rail Feeder Station located at land bounded by East Dock Street, Market Street and Broughty Ferry Road, Stannergate, Dundee.
- 1.1.2 The Proposed Development is classified as a National Development under the Town and Country Planning (Hierarchy of Developments) Regulations 2009 (as amended) as the development is of a type that would fall within National Development 3 – Strategic Renewable Electricity Generation and Transmission Infrastructure, in National Planning Framework 4 (NPF4) and the proposed site is greater than 2 ha.
- 1.1.3 Consequently, this PAC Report is submitted as a requirement of S35C of the TCPA 1997 in accordance with requirements prescribed in the Town and Country Planning (Development Management Procedure) (Scotland) Regulations 2013 (as amended) (The DMRs) and particularly with reference to Section 7B, which prescribes specific content for PAC Reports.
- 1.1.4 In general, the PAC Report provides an overview of the consultation programme and describes: the findings from the PAC process; the steps taken to meet statutory requirements; the feedback received during the PAC process, and how we responded.
- 1.1.5 The PAC Report is comprised of six parts
- 1: Introduction.
 - 2: Project Background – outlines the background to the project and provides a description of the key elements and non-statutory consultation undertaken.
 - 3: The Consultation Process – describes the submission of Proposal of Application Notices (PANs); the dates and venues for consultation events; any additional consultation required (or otherwise) by the local planning authority.
 - 4: Responses and Key Issues – summarises the written responses to consultation and the views raised at public events, as well as the number of written responses received and attendees at events.
 - 5: Project Responses to Consultations – describes how we took account of views raised during the pre-application consultation process, and how members of the public were given feedback on our consideration of the views raised; and
 - 6: Conclusion.
- 1.1.6 Appendices are attached to demonstrate that the PAC process has been carried out under the terms and provisions of the abovementioned Regulations.

2. PROJECT BACKGROUND

2.1.1 Scottish and Southern Electricity Networks, operating under licence held by Scottish Hydro Electric Transmission plc, owns, operates and develops the high voltage electricity transmission system in the north of Scotland and remote islands and has a statutory duty under Schedule 9 of the Electricity Act to develop and maintain an efficient, co-ordinated and economical electrical transmission system in its licence area.

2.2 Site Description

2.2.1 The Site is currently comprised of two adjacent brownfield, former industrial sites, dominated by sealed surfaces, buildings and structures associated with the former uses of the Site. A retaining wall, running east to west through the Site, creates two separate northern and southern parts, which are currently under separate ownership. Whilst the northern part of the Site, which sits on a higher elevation, is included within the redline site boundary, this area will only be used for temporary construction related activities (site compounds, laydown areas etc). This part of the Site will not form part of the final operational development, which will be housed entirely within the Southern part of the site.

2.2.2 The Northern part of the site was most recently used as an abattoir, but the buildings and structures associated with this former use have now been demolished. The Southern part of the site comprises a former oil refinery facility owned by Nynas UK that has been inactive for 10 years. Despite this period of inactivity, the majority of the large cylindrical oil storage tanks and industrial buildings associated with the previous use remain but will be removed by the applicant as part of the development proposals.

2.2.3 The east of the site, across Roodyards Road which is overgrown and disused, is an area of hardstanding also owned by Nynas UK, which is currently in use by Scotriders as a motorbike training centre. Subject to planning permission being granted for the Proposed Development, the intention would be to promote a stopping up order for the closure of Roodyards Road to facilitate the redevelopment of the Site.

2.2.4 To the south and west are areas of similar industrial nature, with the A92 immediately bounding the site to the south and east. The northern boundary, at a higher elevation comprises Broughty Ferry Road, with residential use beyond.

2.3 Proposed Development

2.3.1 The following provides a summary list of the key development components of the Proposed Development:

- One 132 kV GIS substation building (including staff welfare and maintenance areas);
- Two 132 / 25 kV 25 MVA Traction Transformer buildings to meet Network Rail's energisation requirements; and
- Two 132 / 33 kv 120 MVA Grid Transformer (GSP) buildings.

The following comprise the ancillary aspects of the Proposed Development:

- Temporary Distribution Network Operator (DNO) supply building (for construction phase);
- Permanent Generator Building;
- Permanent 33 kV distribution compound;
- Photovoltaic (PV) panels;

- 25 kV underground cable connection between application site and the Network Rail Feeder Station to be located near to Dundee Railway Station;
- New site access from Market Street and retained left in / left out emergency only access on East Dock Street;
- Onsite access roads and parking bays including Electric Vehicle provision.

2.3.2 A range of permanent operational facilities have been identified as being required and these include, in summary:

- Lighting – proposed buildings would not be illuminated during normal operations however floodlights will be installed to be used only in the event of emergencies/ faults during hours of darkness, or during overrun of planned works, or if sensor activated security measures;
- Permanent access – proposed new site access from Market Street and retained left in / left out emergency only access on East Dock Street;
- Security Fencing – a 2.5 m high palisade fence would be installed around the site boundary;
- Earthworks - where necessary a cut-fill exercise will be undertaken to create a level platform, on which the substation will be constructed.
- Underground connectors to buildings;
- Removal of existing structures and equipment on site (by way of permitted development and / or demolition warrants where relevant); and
- Enhancement of existing other broadleaved woodland present at the east of the Proposed Development Site including treatment and removal of invasive non-native plant species (INNS), selective felling and creation of open spaces.

2.4 Requirement for Pre-application Consultation

2.4.1 Regulation 4 of the DMRs requires that pre-application consultation is carried out for all national and major developments. National and major development types are defined by the Town and Country Planning (Hierarchy of Development) (Scotland) Regulations 2009 ('the Hierarchy Regulations').

2.4.2 National developments are developments or classes described as such in National Planning Framework 4 (NPF4). Development is major development if it meets the thresholds or criteria associated with different development types in the Schedule attached to the Hierarchy Regulations. All developments that are not national or major are classified as local developments and are not required to undergo pre-application consultation.

2.5 Pre-application Consultation with Local Planning Authority

2.5.1 Following a Site Selection process, initial pre-application consultation was undertaken with Dundee City Council Planning department during 2023, regarding two potential sites located at Seabraes and Victoria Works. However, the outcome of this initial pre-application process was that neither site represented a viable option that the Council could support, which led to the identification of a more suitable site at Stannergate, which was subsequently selected as the proposed site to be taken forward to the planning application stage.

A formal pre-application enquiry was submitted to the Council on 03 April 2024 (Ref. PREAPP/019/2024). The Council provided a formal pre-application response (see Appendix A) on 14 June

2024, detailing their understanding of the Proposed Development and setting out relevant planning policy and environmental considerations that would need to be addressed as part of the application and supporting documentation.

3. THE PRE-APPLICATION CONSULTATION (PAC) PROCESS

3.1 Overview

- 3.1.1 This section describes the consultation process and demonstrates how statutory PAC requirements have been met. The PAC process is specified in Section 35B of the TCPA 1997, and in Regulation 7 of the DMRs.

3.2 Proposal of Application Notice (PAN)

- 3.2.1 A PAN must be submitted to the Local Planning Authority (LPA), containing the information prescribed in 35B(4) of the TCPA 1997 and Regulation 6 of the DMRs, including an account of what consultation the applicant intends to undertake and information as to when such consultation is to take place, with whom and what form it will take.
- 3.2.2 A PAN was submitted to Dundee City Council on 19th of April 2024 (Ref 24/00282/PAN) triggering the beginning of the statutory consultation period. The PAN provided the Council with an outline of the application details, dates of public events, publicity arrangements, and confirmation of the site location..
- 3.2.3 Copies of the PAN and attachments Is provided in Appendix B.
- 3.2.4 No additional information or consultation was requested by the Council in response to the PAN submission, with the Council confirming that the content of the PAN was acceptable on 09 May 2024. In addition to the PAN and attachments being sent to the LPA, below is a list of other parties these were sent to via email on 19th of April 2024:
- City Centre and Harbour Community Council
 - Stobswell Forum
 - Cllr Georgia Cruickshank
 - Cllr Ken Lynn
 - Cllr Lynn Short
 - Shona Robison MSP
 - Stewart Hosie MP

The decision was taken later (13th of May) to notify two additional relevant non-statutory stakeholders:

- The Eden Project
- Dundee Museum of Transport

3.3 Statutory Newspaper Notices

- 3.3.1 Newspaper adverts must be published in respect of public events, the form of which is described in Regulation 7 of the DMRs. Notice of these public events must be published at least 7 days in advance in a newspaper circulating in the locality of the proposed development. The second (or final) public event must be held at least 14 days after the first public event.
- 3.3.2 In respect of the first consultation event, a newspaper notice was published in the Dundee Courier on 04 May 2024
- 3.3.3 In respect of the final consultation event, a newspaper notice was published in the Dundee Courier on 03 August 2024.

3.3.4 Copies of the newspaper notices are provided in Appendix C.

3.3.5 The notices provided details of the Pre-Application Consultation process, including details of when and where the events were to take place and information of how members of the public could make comments and provide feedback. As part of this members of the public were also directed readers to the project website and Community Liaison Manager contact details for further information.

3.4 Advertising Public Events

3.4.1 In addition to the publication of the newspaper notices, the public events were advertised in the following ways:

- The information was included in the PAN notification correspondence to the community councils, local councillors and MSPs in the area.

3.4.2 4 Quarter page public consultation adverts providing general introductory information on the proposals and advertising the planned public events were published in the Dundee Courier, shown in Appendix D.

- Event 1: 4th May & 11th May 2024
- Event 2: 27th July & 3rd August 2024

3.4.3 Maildrops were issued to local properties ahead of both events covering around 3,175 properties, within the local area. Copies of the maildrop flyers and a plan of the maildrop coverage area provided in Appendix E.

3.5 Public Consultation Events

3.5.1 The first public consultation event was held at Apex City Quay Hotel on 16th May 2024 from 2-7pm

3.5.2 The purpose of the first public event was to provide an opportunity for members of the public, local stakeholders and statutory authorities to view information about the project, ask questions and provide feedback in person.

3.5.3 The Applicant produced a number of consultation materials to explain the proposals, including:

- Consultation Event banners providing background and context for the proposed development, details of the proposals themselves and Information on how to provide comments and feedback on the proposals. A copy of these banners is provided in Appendix F.
- Additional visual aids including 3D Visualisations were presented on a screen. Attendees were able to input their postcode to our system to view the visual impact of the project from any location.
- Consultation booklets (Appendix G) were available for attendants to take away, with contact details, key dates, and information on how to provide comments online, which were made available on the project website two weeks before the event.
- Feedback forms, including the closing date for feedback, the template for which is contained in Appendix H.

3.5.4 A sign-in register was used to understand the number of attendees. A total of 10 attendees over the duration of the event were recorded

3.5.5 Following the consultation event, SSEN Transmission issued an update on the project website thanking members of the public for attending and advised all material that had been displayed was available for download.

- 3.5.6 The feedback period for the first public consultation event was 6 weeks and closed on 27 June 2024 which was communicated in the consultation materials. We received 0 formal feedback forms and 2 written responses by email were received during this feedback period. Verbal feedback from the event was also captured and responded to in the final event materials.
- 3.5.7 The final public consultation event was held at Apex City Quay Hotel on Thursday 15th August from 2–7pm.
- 3.5.8 The purpose of the final public event was to give feedback to members of the public in respect of comments received as regards the proposed development from earlier consultation, and to provide further opportunity to view information about the project, ask questions and provide feedback in person.
- 3.5.9 Consultation materials provided at the final event were consistent with those used for the first public event, with the addition of updated consultation banners and booklet, as provided respectively in Appendix I and Appendix J. In line with PAC requirements, the updated banners and booklet consultees at the final event provided a summary of comments received at the first event and details of how that feedback had been considered and responded to.
- 3.5.10 A sign-in register was used to understand the number of attendees. A total of 13 attendees over the duration of the event were recorded.
- 3.5.11 The feedback period for the final public consultation event was 4 weeks and closed on 12th of September which was communicated in the consultation materials. 2 responses were received during this feedback period.
- 3.5.12 As evidenced by the documentation contained within the submitted appendices, members of the public were clearly informed at various stages that the purpose of the Pre-Application Consultation process was to provide feedback to the prospective applicant only, and that the opportunity to comment on the proposals directly to the LPA would be provided at the planning application stages should the proposed development progress to that stage.

4. HOW HAS THE PROJECT RESPONDED TO FEEDBACK

4.1 Response to Feedback

- 4.1.1 This section documents how the project has responded to the themes raised by stakeholders through the consultation process. We address each theme in turn below. These responses to the feedback raised were detailed in the Consultation Booklet and Banners for the second public consultation event.
- 4.1.2 Table 1 below summarises how the project has responded to feedback received from the community and statutory stakeholders through the PAN and pre-application process.

Table 1: Summary Feedback

<i>Theme & Feedback</i>	<i>Response</i>
Proximity to the Eden Project Attendees noted the proximity of the proposed Stannergate site to the new Dundee Eden Project which will be located east of Melville Lane. Concerns were raised around whether this would cause any disruption to the Eden Project.	<p>We have held pre-application discussions with Dundee City Council who are the Planning Authority for both this project and the Eden Project, the latter of which we understand is now consented. As part of our non-statutory engagement, we emailed the Eden Project a copy of our Pre-application Notice to make them aware of our plans.</p> <p>The two projects are not situated directly adjacent to each other, there is a barrier of businesses between the two sites with the Stannergate site situated west of Market Street. Therefore, we do not predict any adverse impacts on the operation of the Eden Project because of our plans. However, we will seek to continue to engage with them as and when required and mitigate against any potential impact. Traffic will also be carefully managed through the implementation of a Construction Traffic Management Plan (see below for further details).</p>
Construction traffic Concerns about the level of construction traffic given the proximity to the A92.	<p>It is anticipated that a Construction Traffic Management Plan (CTMP) will be required as part of the development, setting out a clear methodology for how construction traffic will be managed.</p> <p>This will address such issues as construction traffic routing, temporary traffic management requirements and measures for the environmental control of vehicles and transported materials, such as wheel washing and dust suppression. Specific consideration will also be given to the transportation of any Abnormal Indivisible Loads (AILs) and a route assessment will be included to demonstrate how AILs will be transported to the site.</p> <p>It is expected that the CTMP will require to be agreed with Transport Scotland, Dundee City Council and Police Scotland prior to works starting on site.</p>
Substation site name Some attendees noted the Stannergate name was potentially misleading as residents generally associate the Stannergate area as being further east.	<p>We acknowledge the feedback received that the Stannergate name may not accurately reflect the actual site location, however after careful consideration, the decision has been taken not to change this for both technical and safety reasons. Each of our projects is required to apply to the Electricity System Operator (ESO) to obtain a code in advance, which can be a time-consuming process. Moreover, a unique and easily identifiable site reference is critical when dealing with emergency situations that may affect the network, and careful consideration has been given in this instance to achieve this.</p> <p>Any change in name at this late stage would need to be agreed by both the ESO and the Transmission control room which could ultimately delay the project programme.</p>
Site location Concern raised over why we have chosen this site and not an alternative.	<p>There were several considerations and criteria restraints which included distance, size, and Dundee City Council area development plans which safeguard sites across the city for different purposes. Alternative site options were therefore limited. A summary of the site selection process undertaken is set out in "How we've selected the substation site" section.</p> <p>The site comprises the vacant former abattoir site on Broughty Ferry Road and the derelict former Nynas fuel storage facility that fronts onto East Dock Street. Our proposals offer the opportunity to redevelop the site in a manner that will make a positive contribution fitting to the character and amenity of the local area. Dundee Port continues to be recognised as one of the Scottish Government's Low Carbon/</p>

<i>Theme & Feedback</i>	<i>Response</i>
	Renewables Enterprise Areas with the aim of encouraging businesses in this sector to set up and grow in Scotland. Our proposed site, directly north of the port, is in line with this area designation as the reinforcement of the electricity transmission grid will ensure progress towards achieving net zero and a decarbonised economy.
Visual impact and landscaping Questions around how the site will be screened to reduce visual impact. Comments were also made in relation to how the substation would look, with requests for it to be vibrant. Ideas were shared that a local artist could be commissioned to paint a mural which links the site to its history.	The proposals will be supported by a landscape strategy plan for the site, which will aim to maximise landscape mitigation where possible, to minimise the potential visual impact of the proposed development. Where appropriate, this will include new or enhanced boundary planting. We recognise the potential visual impact our projects can have, and we work to make sure our designs minimise these impacts as far as possible. However, we need to ensure that the site is designed to meet all operational and health and safety requirements, in line with current regulations and guidelines. Where possible, we will consider any alternative designs and the potential inclusion of a public art which Dundee City Council encourages as part of all new major developments.
Transport Scotland	<p>In summary Transport Scotland's comments were:</p> <ul style="list-style-type: none"> • A Transport Statement, detailing traffic generation by volume, type and distribution for the proposals, during both construction and operation. • Design details for the proposed site access points confirming compliance with DMRB requirements including visibility splays. • A Stage 1 Road Safety Audit covering these access proposals. • Construction Traffic Management Plan (CTMP). Assessment of any abnormal loads and the likely routes for the proposals. <p>AECOM consultants have been appointed to undertake a Transport Assessment in support of the submitted Environmental Assessment, which will assess levels of likely trip generation, distribution and type of vehicles during both the construction and operational phase. This will be undertaken in accordance with Transport Scotland's 'Transport Assessment Guidance' and the scope discussed and agreed with both Transport Scotland and Dundee City Council in advance of submission. The Transport Assessment will also consider how the site will be accessed both during construction and operational phases including swept path analysis of all proposed access points to demonstrate that traffic entering and exiting the site will not impact on or block traffic on the trunk road or interfere with the necessary visibility splays.</p> <p>Transport Scotland's comments in relation to the proposed secondary access area are noted and consideration to be given to moving the access westwards away from the bend and forming a left in / left only access junction.</p> <p>The design proposals for both site accesses will be accompanied by a Stage 1 Road Safety Audit, undertaken in accordance with DMRB GG119, along with a Designers Response. We will seek approval from Transport Scotland for both the brief and audit team prior to the audit being undertaken.</p> <p>As discussed above it is expected that any future planning permission will be subject to a condition requiring the preparation and approval of a CTMP for the site.</p> <p>Transport Scotland's comments regarding drainage, boundary fencing, landscaping and any external site lighting are noted and will be considered in the final design.</p>

5. CONCLUSIONS

- 5.1.1 This PAC Report documents the consultation which ran for 17 weeks, starting 16th of May 2024 to 5th of September 2024.
- 5.1.2 The PAN was submitted to the LPA on 19th of April 2024. Following this, a first public consultation event was held at Apex City Quay Hotel on 16th of May 2024, and a final consultation event at Apex City Quay Hotel on 15th of August 2024.
- 5.1.3 The consultation was designed to facilitate engagement with the local community, community councils, statutory authorities and local leadership in order to invite feedback on the Proposed Development. The common themes from the feedback were:
- Proximity to the Eden Project
 - Construction traffic
 - Substation site name
 - Site location
 - Visual impact and landscaping
- 5.1.4 The approach to public consultation has ensured that the relevant stakeholders have been given the opportunity to comment on the proposals. This has enabled locally important issues and concerns to be identified and subsequently considered in the preparation of the Stannergate 132kV Substation and Network Rail Feeder Station planning application.
- 5.1.5 This PAC process has been informed by the statutory process laid out in the TCPA 1997 and the DMRs as referenced above.

APPENDICES

STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX A – DUNDEE CITY COUNCIL PRE-APPLICATION ENQUIRY RESPONSE

STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX B – PRE-APPLICATION NOTICE (19 APRIL 2024)



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX C – STATUTORY PRE-APPLICATION CONSULTATION EVENT NEWSPAPER NOTICES

STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX D – SSEN PRE-APPLICATION CONSULTATION EVENT NEWSPAPER ADVERTS



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX E – SSEN PRE-APPLICATION CONSULTATION EVENT MAILDROP



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX F – SSEN PRE-APPLICATION CONSULTATION EVENT 1 BANNERS



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX G – SSEN PRE-APPLICATION CONSULTATION EVENT 1 BOOKLET

STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX H – SSEN PRE-APPLICATION CONSULTATION EVENT 1 FEEDBACK FORM



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX I – SSEN PRE-APPLICATION CONSULTATION EVENT 2 BANNERS



STANNERGATE - PRE-APPLICATION CONSULTATION REPORT

APPENDIX J – SSEN PRE-APPLICATION CONSULTATION EVENT 2 BOOKLET

