East Lothian Council

COMMITTEE:	Planning Committee
MEETING DATE:	19 August 2025
BY:	Executive Director for Place
REPORT TITLE:	Application for Planning Permission for Consideration

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Application No.	**25/00083/AMM**
Proposal	Approval of matters specified in conditions 2 of planning permission in principle 22/00852/PPM
Location	**Land Adjacent to Dunbar Landfill Site** **Oxwell Mains** **Dunbar** **East Lothian** **EH42 1SW**
Applicant	SP Energy Networks
Per	Arcadis
Recommendation	Consent Granted

REPORT OF HANDLING

The development proposed in this application is, under the provisions of The Town and Country Planning (Hierarchy of Developments) (Scotland) Regulations 2009, defined as a national development and thus it cannot be decided through the Council's Scheme of Delegation. It is therefore brought before the Planning Committee for a decision.

APPLICATION SITE

The application site has an area of some 146 hectares and stretches from the Broxburn junction of the A1 trunk road in the west, to the coast to the south of Thorntonloch to the east. It has a generally linear shape but includes a larger area situated between the Dunbar Energy Recovery Facility and Dunbar landfill site.

The northwestern part of the site is situated in the countryside on the north side of the A1. The remainder of the site generally consists of more countryside on the southern side of the A1, although the easternmost part crosses back over the A1 to the coast.

The area of land comprising the southeasternmost part of the application site where it meets the coast is within the Thorntonloch to Dunglass Coast Special Landscape Area.

The part of the application site located between the Dunbar Energy Recovery Facility and Dunbar landfill site is within the boundary of the Battle of Dunbar II, a battlefield included within the Inventory of Historic Battlefields.

The part of the application site located between the Dunbar Energy Recovery Facility and Dunbar landfill site is also safeguarded for waste management purposes by Policy W1 of the adopted East Lothian Local Development Plan 2018.

The nearest residential properties to this main part of the application site are located some 450m to the southwest in Easter Meikle Pinkerton.

RELEVANT PLANNING HISTORY

In January 2022 National Grid Electricity System Operator published its seventh Network Options Assessment (NOA) which describes the major projects considered to meet the future needs of Britain's electricity transmission system as outlined in the Electricity Ten Year Statement (ETYS) 2021 and recommends which investments in the year ahead would best manage the capability of the transmission networks against the uncertainty of the future. The NOA (2022) recommends the development of a number of High Voltage Direct Current (HVDC) reinforcements between the east coasts of Scotland and England, one being the Eastern subsea HVDC link: Torness to Hawthorn Pit, County Durham (E2DC), known as the Eastern Link 1 Project.

The development proposed in this application is required to support and operate the wider Eastern Link 1 project which comprises a new subsea High Voltage Direct Current (HVDC) link between East Lothian, Scotland and Hawthorn Pit in County Durham, England. The Eastern Link 1 project will reinforce the electricity transmission system, enabling large volumes of renewable energy generated in Scotland to be transmitted to England whilst ensuring Scotland remains supported by a secure and stable supply of energy.

On 2 May 2023 planning permission in principle (ref: 22/00852/PPM) was granted for the construction and operation of an onshore converter station, and for associated development including underground electricity cables and landfall at Thorntonloch. The proposal forms part of the Scottish Power Eastern Link 1 project, for a new subsea High Voltage Direct Current (HVDC) link and comprises the following key elements:

o A new converter station to switch electricity from conventional alternating current (AC) to direct current (DC) for onwards transmission of electricity (or vice versa depending on the direction of operation);
o Onshore underground high-voltage direct current (HVDC) electricity cables required to deliver electricity from the converter station to a landfall south of Thorntonloch Beach (or vice versa). These cables will connect to the onwards marine cables;
o Onshore underground high-voltage alternating current (HVAC) electricity cables required to deliver electricity from Branxton substation to the converter station (or vice versa); and
o A Landfall area where marine cables come ashore and will be joined onto the onshore underground cables.

It was indicated in planning permission in principle 22/00852/PPM that a converter station platform could have a maximum footprint of approximately 300m by 200m and would be located within the larger area of the application site situated between the Dunbar Energy Recovery Facility and the Dunbar landfill site. A converter station housing the electrical infrastructure would be located on the substation platform and the electrical infrastructure could have a maximum height of some 29 metres. The application submissions in planning permission 22/00852/PPM informed that the converter station is likely to comprise several elements to facilitate the conversion from AC to DC (or vice versa):

o AC Switchgear: To connect the converter station to the existing AC transmission system. This would include a range of equipment including high voltage electrical switchgear, filters and compensation units. The main function of this equipment would be to harmonise the converter AC systems characteristics with the wider transmission AC system;
o Converter Transformers: These align the converter AC voltage with the wider transmission network voltage. These units are normally sited outdoors within segregated transformer bays. It is anticipated that there with be six (plus one critical spare) single phase transformers in total;
o Valve Halls: Contain power electronics equipment that convert AC voltages to DC (or vice versa). The suite of converter units cannot be accommodated outdoors and need to be maintained in a controlled
environment. Due to the layout of the devices and operating voltage, the DC buildings are usually the tallest within the converter station (maximum 29 m height has been assumed). The semiconductor devices generate heat during operation and require associated localised cooling
equipment and wider HVAC plant and systems;
o DC Hall: Houses the converter high voltage DC equipment including switchgear and network resistors and houses the transition equipment for the connection of the DC cables;
o Control Building: Contains building services equipment, control panels and associated control room, protection and communication equipment, offices and welfare facilities and other auxiliary systems all located within an enclosed building;

o Spare Parts Building: To house spare parts and consumable components, supplemented by hardstanding areas provided for storage of spare transformer and spare cable drums; and
o Additional equipment within the site is likely to include a standby/backup diesel generator and fire deluge storage tanks.

It was indicated in planning permission in principle 22/00852/PPM that the cable route would run generally south-east to north-westwards for some 5.8 km from the proposed site for landfall south of Thorntonloch, under open countryside to the south of Dunbar landfill site, where the proposed cable route would then split so that the HVDC cable runs around the south side of the landfill site, and the HVAC cable runs around the north side of the landfill site to both connect with the converter station.

It was indicated in planning permission in principle 22/00852/PPM that access to the converter station would be provided by a new permanent access road from the existing Dunbar Energy Recovery Facility access road.

Condition 2 of planning permission in principle 22/00852/PPM states:

The submission for approval of matters specified in conditions of this grant of planning permission in principle shall include details of the layout, siting, design and external appearance of the converter station, electricity cables and associated infrastructure, the means of access to them, the means of any enclosure of the boundaries of the site and landscaping (including landscape and visual mitigation) of the site in accordance with the matters listed below. No work shall begin until the written approval of the Planning Authority has been given, and the development shall be carried out in accordance with that approval.

a) Details of the finished ground levels and finished floor levels of the buildings;

b) The total height of any building shall not exceed 29 metres from the finished ground levels, as approved. The finished ground level shall be no higher than the highest part of the existing ground level of the site;

c) Details of the proposed colour treatment of the converter station and any other landscape and visual mitigation (which shall include architectural mitigation) to be incorporated into its design and external appearance;

d) Details of all external lighting proposed;

e) Details of the area and positioning of the converter station platform, which shall not exceed a footprint of 300 metres by 200 metres and which shall generally accord with that shown on the drawing titled 'Eastern Link Northern Point of Connection Converter Station and Cable Corridor: Converter Station Layout' Rev 02 docketed to this planning permission in principle;

f) Details of the final route of the onshore export cables (with proposed micro siting limits), and the locations of any underground joint bay(s); and

g) Details of the siting, design and external appearance of any permanent above ground features associated with the onshore export cables.

In this condition, the converter station means all the electrical equipment, ancillary equipment, internal roads and any perimeter security fence to be located on the converter station platform, as indicatively described in Chapter 4 (Development Description) of the Environmental Impact Assessment Report docketed to this planning permission in principle.

No part of the development hereby approved under that application for approval of matters specified in conditions shall be begun on the site until all of the above details pertaining to such development have been submitted to and approved in writing by the Planning Authority.

Reason:
To enable the Planning Authority to control the development in the interests of the amenity of the development and of the wider environment.

PROPOSAL

Through this application, permission is sought for the approval of matters specified in condition 2 of planning permission in principle 22/00852/PPM, so for the detail of the layout, siting, design and external appearance of the converter station, electricity cables and associated infrastructure, the means of access to them and the means of any enclosure of the boundaries of the site and visual mitigation.

The proposed converter station platform would have a footprint of some 300 metres by 200 metres and would be located within the larger area of the application site situated between the Dunbar Energy Recovery Facility and the Dunbar landfill site.

The converter station itself would comprise of eight buildings, an HVDC building, two ACY-ACF buildings, a service building, a storage building, two cooling buildings and a fire protection building. The buildings all take the form of simple, pitched roof industrial buildings clad in vertically orientated composite cladding panels. The composite cladding panels would comprise of a mix of colours to include anthracite (RAL 7016), Squirrel Grey (RAL 7000), Light Grey (RAL 7035) and Pure White (RAL 9010) and arranged to provide a graduation in colour bandings from dark to light from the bottom to the top of the buildings. The roof of the buildings would be clad in a standing seam roofing system coloured Pure White (RAL 9010).

The maximum building height would be 25.85m above the finished ground level, which would be the HVDC building. As a comparison, the highest point of the largest component of the existing Dunbar Energy Recovery Facility building is some 47 metres in height.

The converter station would also include external electrical and other equipment including transformers, fan cooling areas, water storage tanks, oil tank, oil separator, switchrooms, diesel generators and a wastewater tank.

It is proposed that the converter station would be contained within security fencing with access gates. The proposed perimeter security fencing would comprise of inner lengths of 3m high palisade fencing topped with post and wires, with an outer security fence being 2.4m high palisade fencing. Two sets of 3m high metal sliding gates would facilitate access from a new access road into the converter station.

Manual and sensor controlled external lighting would be located across the site and will be mounted on individual columns and on buildings and structures. The lighting is to be designed as such to minimise the environmental impacts of glare and light spill. The applicant has submitted an external lighting schedule which demonstrates that there would be zero upward light and all lighting is dark sky approved, which would not constitute light pollution or light trespass given the low level.

Access to the site would be by way of a new access road taken from the existing access road to the Dunbar Energy Recovery Facility. A new footway would be provided along the side of the new access road.

Car parking and vehicle turning would be provided on the converter station platform, with 20 car parking spaces for the use of operations and/ or maintenance staff who will be required to operate, monitor, and maintain electrical equipment and plant. Of the 20 spaces, 4 spaces would be accessible parking bays and a minimum of 5 spaces would be provided with
EV charging points.

The application drawings show the route of the underground cables from landfall to the converter station with a micro siting limit either side of the cable route, and the location of underground joint bays. The access points to the underground joint bays would be enclosed by 1.5m high timber fencing.

THE DEVELOPMENT PLAN

Section 25 of the Town and Country Planning (Scotland) Act 1997 requires that the application be determined in accordance with the development plan, unless material considerations indicate otherwise.

The development plan is the adopted National Planning Framework 4 (NPF4) and the adopted East Lothian Local Development Plan 2018.

NPF4 identifies 18 national developments that are significant developments of national importance. National development 3 of NPF4 (Strategic Renewable Electricity Generation and Transmission Infrastructure) supports renewable electricity generation, repowering, and expansion of the electricity grid. National development 3 informs that the electricity transmission grid will need substantial reinforcement including the addition of new infrastructure to connect

and transmit the output from new on and offshore capacity to consumers in Scotland, the rest of the UK and beyond. Whilst National development 3 references a Scotland wide rather than a specific location, the south of Scotland (including East Lothian) is identified for delivering new and/or upgraded infrastructure directly supporting on and offshore high voltage electricity lines, cables and interconnectors including converter stations, switching stations and substations.

The development approved by planning permission in principle 22/00852/PPM would enable the transmission of renewable electricity and would contribute to the delivery of infrastructure of national importance. The infrastructure is a key element in the provision of renewable energy and will ensure progress towards achieving net zero and a decarbonised economy. As transmission infrastructure to support renewable energy technology, it is also part of National Development 3 and is thus supported by NPF4.

In terms of Policies 1, 2 and 3 of NPF4, the contribution this development could make to addressing the climate and nature crises (Policy 1), to make adjustments or incorporate features that reduce greenhouse gas emissions (Policy 2), or to protect, conserve, restore and enhance biodiversity (Policy 3), is largely predetermined by the previous grant of planning permission in principle 22/00852/PPM.

Therefore Policy 14 (Design, quality and place) of NPF4 is relevant to the determination of this application. Also relevant to the determination of the application are Policies DP1 (Landscape Character), DP2 (Design), T1 (Development Location and Accessibility) and (T2 (General Transport Impact) of the East Lothian Local Development Plan 2018.

REPRESENTATIONS

None

COMMUNITY COUNCIL COMMENTS

East Lammermuir Community Council have been consulted on the application and no response has been received.

PLANNING ASSESSMENT

The principle of the siting of an onshore converter station, electricity cables and associated infrastructure, the means of access to them, the means of any enclosure of the boundaries of the site and landscaping (including landscape and visual mitigation) are already decided by the grant of planning permission in principle 22/00852/PPM.

Therefore, in the determination of this application the Council, as Planning Authority, can only concern itself with the layout, siting, design and external appearance (including architectural mitigation) of the converter station, electricity cables and associated infrastructure, the means of access to them

and the means of any enclosure of the boundaries of the site. In this regard the detailed proposals have to be considered against relevant development plan policy and the requirements of condition 2 attached to planning permission in principle 22/00852/PPM.

The layout proposed through this approval of matters application for the converter station, electricity cables and associated infrastructure, the means of access to them and the means of any enclosure of the boundaries of the site is broadly consistent with the indicative layout docketed to planning permission in principle 22/00852/PPM.

The proposed converter station is an essential component of the Eastern Link 1 project which will reinforce the electricity transmission system, enabling large volumes of renewable energy generated in Scotland to be transmitted to England whilst ensuring Scotland remains supported by a secure and stable supply of energy.

Amongst other matters policy DP1 of the East Lothian Local Development Plan 2018 requires that all new development, with the exception of changes of use and alterations and extensions to existing buildings, must be well integrated into its surroundings by responding to and respecting landform.

Policy DP2 requires, amongst other matters, that the design of all new development, with the exception of changes of use and alterations and extensions to existing buildings, must be appropriate to its location in terms of its positioning, size, form, massing, proportion and scale and ensure privacy and amenity, with particular regard to levels of sunlight, daylight and overlooking, including for the occupants of neighbouring properties.

The proposed development would be aligned with the existing pattern of industrial development along the north side of the A1 in this location within East Lothian, situated to the east of Dunbar Cement Works between the Dunbar Energy Recovery Facility and Dunbar landfill site, with the east coast main line to the north of it and a quarry beyond. The site sits at a lower level to the A1 trunk road and would be screened to a certain degree by a combination of existing built structures, screening landforms and structural vegetation that contribute to the containment of impacts on neighbouring seascape, landscape and visual receptors.

The application drawings show that the external walls of the buildings and their roof cladding would be finished in vertically orientated composite cladding panels coloured anthracite (RAL 7016), Squirrel Grey (RAL 7000), Light Grey (RAL 7035) and Pure White (RAL 9010). It is proposed that cladding panels would be fitted so to provide a banding graduation of colours from dark to light (bottom to top).

The overall composition of the converter station site would have a coordinated approach to the façade design across the different buildings so that, although separate, they would look cohesive in views within the wider landscape. The graduation of colour on the cladding panels and their banding effect would help

minimise the visual impact of the buildings and create a cohesive composition of buildings to help blend them into the sky around the coastline, and would take some recognition of colours on the nearby Torness Power Station. The smooth faced, vertically orientated composite cladding panels would provide an unbroken appearance, avoiding unnecessary shallow articulations and recesses. The colour pattern would help to visually reduce the impact of the large buildings, by not having large, solid blocks of one colour, which would only emphasize the mass of the larger buildings. This approach would assist in reducing the apparent overall massing and improve the visual coalescence of the site.

The **Council's Senior Landscape Officer** advises that the colour banding with grey colours that transition from darker grey at the base to lighter grey at the top would help to reduce the perceived height of the buildings, helping them to blend into the skyscape when seen in views from the coast. The Senior Landscape Officer also notes that the stepping of the coloured bands would help to reduce the overall perceived width of the buildings and therefore would reduce the prominence of these large structures in the wider environment. The Senior Landscape Officer also advises that the colour palette would help the buildings be read with the adjacent structures.

When seen in this context the proposed development would successfully integrate into its landscape setting and would not appear harmfully prominent, incongruous or intrusive within the surrounding landscape.

The requirement for a detailed scheme of landscaping is embodied in Condition 13 of planning permission in principle 22/00852/PPM and therefore remains in force. The approval of this matters as specified in Condition 13 is not sought through this application but remains in force. Thus, there is no requirement to also secure this again through conditions attached to this approval of matters specified in conditions application.

The proposed converter station would be located at a considerable distance away from residential properties in the area. It would not give rise to a harmful loss of privacy or amenity to any residential property.

The requirement for the submission of a Construction Environmental Management Plan (CEMP) to identify and minimise any potential noise and dust impacts that may arise during construction of the proposed development is embodied in Condition 5 of planning permission in principle 22/00852/PPM. The approval of these matters as specified in Condition 5 are not sought through this application but remain in force. Thus, there is no requirement to also secure these again through conditions attached to this approval of matters specified in conditions application.

In all of the above the proposals are consistent with Policy 14 of NPF4 and Policies DP1 and DP2 of the East Lothian Local Development Plan 2018.

The requirement for a Species Mitigation and Management Plan and Habitat Management and Enhancement Plan is embodied in Conditions 18 and 19 of

planning permission in principle 22/00852/PPM and therefore remain in force. The approval of these matters as specified in Conditions 18 and 19 are not sought through this application but remain in force. Thus, there is no requirement to also secure these again through conditions attached to this approval of matters specified in conditions application.

The **Council's Roads Services** raise no objection to the proposed development, satisfied the arrangements for access are acceptable and would not result in a road or pedestrian safety hazard, consistent with Policies T1 and T2 of the East Lothian Local Development Plan 2018.

The requirement for a Construction Traffic Management Plan is embodied in Condition 8 of planning permission in principle 22/00852/PPM and therefore remains in force. The approval of this matter as specified in Condition 8 is not sought through this application but remains in force. Thus, there is no requirement to also secure this again through a condition attached to this approval of matters specified in conditions application.

Historic Environment Scotland have been consulted on the application and make no comment on the proposals.

Scottish Water raise no objection to the application.

The **Council's Team Manager – Structures and Flooding** raises no objections to the application on the grounds of flooding or drainage. The Scottish Environment Protection Agency (SEPA) also raise no objection to the application.

Network Rail raise no objection to the application.

In conclusion, the proposals are considered to be in accordance with the provisions of the stated relevant Development Plan policies and there are no material considerations which outweigh the proposal's accordance with the Development Plan.

RECOMMENDATION

That approval of matters specified in conditions be granted subject to the following conditions:

1 No development shall take place on site unless and until final site setting out details have been submitted to and approved by the Planning Authority.

The above mentioned details shall include a final site setting-out drawing to a scale of not less than 1:200, giving:

a. the position within the application site of all elements of the proposed development and position of adjoining land and buildings;
b. finished ground and floor levels of the development relative to existing ground levels of the site and of adjoining land and building(s). The levels shall be shown in relation to an Ordnance Bench Mark or Temporary Bench Mark from which the Planning Authority can take measurements and shall be shown on the drawing; and

c. the ridge height of the proposed shown in relation to the finished ground and floor levels on the site.

Reason:
To enable the Planning Authority to control the development of the site in the interests of the amenity of the area.

2 Prior to the commencement of development, samples of the composite cladding panels to clad the buildings, including their colour, and a sample of the roof cladding for the buildings, including its colour, shall be submitted to and approved by the Planning Authority. The external finishes used in the development shall conform to the details so approved.

Reason:
To ensure the development is of a satisfactory appearance in the interest of the landscape character of the area.