Denny to Wishaw Network Upgrade
Reinforcement Project

Proposed WB Route 400kV Overhead Line

Ref: ECU00006380

Covering Letter

June 2026

10th June 2026

Alan Graham

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Dear Ms. Lesley Tosun,

Please find attached an application for consent under Section 37 of the Electricity Act 1989 to install, operate, and keep installed approximately 19km of proposed overhead line (OHL) between the Bonnybridge Substation, Cumbernauld substation via a spur, and an existing overhead line (known as the 'XX Route') north of Glenmavis supported by 62 steel lattice towers, and proposed ancillary works.

This development is known as the Denny to Wishaw Network Upgrade (DWNO) Reinforcement Project - Proposed WB Route, which holds an ECU Reference Number of: ECU00006380.

SP Transmission plc (SPT) submits this application for consent under Section 37 of the Electricity Act 1989 for the installation and operation of the proposed 19km of 275 / 400kV OHL (hereinafter known as the Proposed Development).

This application is submitted by SPT (The Applicant). SPT are a wholly owned subsidiary of Scottish Power Energy Networks (SPEN). SPEN owns, operates, and develops the high voltage electricity transmission system within Central and Southern Scotland, and holds a license under the Electricity Act 1989 to develop and maintain an efficient, coordinated, and economical system of electricity transmission.

The DWNO consists of 3 separate applications under section 37 of the Electricity Act 1989 and an application under the Town and Country Planning (Scotland) Act 1997 (as amended) for the Cumbernauld Substation Extension to North Lanarkshire Council.

The Project has been subject to Environmental Impact Assessment (EIA) and a single EIA Report has been produced to accompany the applications for consent.

This overhead line forms part of the DWNO Project for which the following relevant section 37 applications have also been submitted today:

1. WB Route 400kV OHL (This application) (application Reference ECU00006380)
2. XX and XR Uprating from 275kV to 400kV (Application Reference ECU00006382)
3. ZG Uprating from 2575 to 400kV (Application Reference ECU00006375)

A copy of the EIA report has been uploaded as part of the WB Route Application.

Proposed Development for which Section 37 and deemed planning permission is sought:

The Proposed Development would include the following works, for which Section 37 Consent under the 1989 Act and deemed planning permission under the Town and Country Planning (Scotland) Act 1997 is sought to install, operate and keep installed:

- Construction of approximately 19 km of a new 400 kV overhead line (WB Route) between Bonnybridge Substation, Cumbernauld substation via a spur, and an existing overhead line (XX Route) north of Glenmavis.

Ancillary Development for which Deemed Planning Permission is sought:

The following works would be required as part of the Proposed Development, or to facilitate its construction and operation:

- Removal of existing OHL (CB route) between Bonnybridge substation and Cumbernauld substation.
- Two sections of AA OHL to be undergrounded, the first between Bonnybridge substation and the Forth and Clyde Canal, including one Cable Sealing End (CSE) tower and one temporary tower. The second between towers AA006 and AA009, including two CSEs.
- Temporary accesses for construction of WB route and downleads to Bonnybridge substation.

Please refer to Volume 1, Chapter 4: Project Description of the Environmental Impact Assessment Report (EIA Report) for more details.

Established Need for Proposed Development:

The Proposed Development is required due to support the UK and Scottish Governments' legally binding net-zero targets by enabling the connection and efficient transmission of increasing volumes of renewable electricity. As Transmission Owner for central and southern Scotland, the Applicant has statutory duties to maintain an efficient and economic network, and the overall DWNO Project forms part of essential planned reinforcements to meet future generation and demand. The need for the Project has been confirmed through the National

Energy System Operator's Network Options Assessment and the Holistic Network Design, which identify DWNO as necessary to deliver secure, efficient and affordable decarbonisation of the electricity system.

Further details on this are outlined in Volume 1, Chapter 1 of the Environmental Impact Assessment Report (EIAR).

Necessary document within the application for consent:

The Proposed Development constitutes Schedule 1 development under *The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017*. This is in accordance with Schedule 1, paragraph 1(3), which applies to the construction of overhead electrical power lines with a voltage of 220 kilovolts or more and a length exceeding 15 kilometres. EIA is a mandatory requirement for Schedule 1 Development. Accordingly, this application for consent is accompanied by an EIA Report as well as a Habitats Regulation Appraisal.

Therefore, in accordance with the Scottish Government's *Priority Applications for Transmission Infrastructure guidance: Section 37 of the Electricity Act 1989*, this letter sets out below the measures taken by the Applicant to satisfy the requirements of the guidance and ensure that a complete application has been submitted. The necessary documentation referred to in Section 7 - 'Submission of Application' within the above guidance is listed below, and its specific location is referenced in the corresponding cell.

Necessary Documentation	Submission Reference
Location plan and site plan, showing clearly and at an appropriate scale the location of all infrastructure for which section 37 consent and deemed planning permission (where relevant) is sought, including towers or poles, and any ancillary development;	The location of the Proposed Development is provided within the EIA Report in Volume 2, Figure 1.1: Overview of Denny to Wishaw Network Upgrade. A separate location plan is also provided in Volume 2, Figure 1.2: Proposed Development Location Plan. A description of the Proposed Development is provided in Volume 1, Chapter 4: Project Description.
The entirety of the environmental information required in an EIA report, where the proposal is deemed to be EIA development;	The information is contained within the Denny to Wishaw Network Upgrade EIA Report as listed in Annex 1 that accompanies this cover letter. The EIA Report has been informed by, and responds to the matters raised within, the EIA Scoping Opinion issued by Scottish Ministers on 07 October 2025. A number of Supporting Documents are also submitted with the application; these documents provide information additional to that contained within the EIA Report. The Supporting Documents are also listed in Annex 1.
An explanation of how all the scoping responses from statutory consultees have been addressed (for EIA developments);	An overview of the EIA Scoping Process is included in Volume 1, Chapter 2: Approach to EIA. A Scoping Matrix is also included in Volume 1, Chapter 2: Approach to EIA. This sets out how the Applicant has responded to all comments and issues raised by statutory consultees as part of the EIA Scoping process and includes details of how the Scoping Opinion issued by Scottish Ministers on 07 October 2025 has informed the scope and content of the EIA and supporting EIA Report.

	A list of the topics that were scoped out from the EIA, and a summary of the reasons for this, is also included at Volume 1 Chapter 2: Approach to EIA
Details of the established need for and of the anticipated benefits of the project;	Details of the established need for the project are outlined in Volume 1, Chapter 1: Introduction.
A detailed explanation of all alternative options considered and why discounted;	Details of alternative options considered by the Applicant for the project are outlined in Volume 1, Chapter 3: Evolution of Design and Alternatives.
A pre-application consultation report setting out the information provided to the public and procedures carried out, and how comments received from the public have been considered in formulating the final design of the proposal;	A Pre-Application Consultation Report (PAC Report) has been prepared by the Applicant; this details the public consultation and engagement conducted by the Applicant in advance of the submission of the application and summarises how feedback has been considered in the finalisation of the design of the proposal. The PAC Report is included as a Supporting Document to the application.
A planning statement;	A Planning Statement has been prepared by the Applicant; this details an assessment of the Proposed Development against the relevant provisions of the Development Plan. The Planning Statement is included as a Supporting Document to the application.
A schedule of mitigation measures;	The EIA Report includes suggested mitigation within each technical assessment included as part of the overall report; this information is collated into a single Schedule of Mitigation at Volume 1, Chapter 17 Schedule of Mitigation.
A suggested set of conditions based on ECU 'model' section 37 conditions;	A set of model conditions requires to be agreed between ECU and the Planning Authority; it is expected that this set of conditions will become available during the determination period of the application.
A statement confirming the Applicant's view that all necessary environmental information has been submitted with the application, and that it does not anticipate the need to propose any substantive changes to the development;	The Applicant confirms, by virtue of this cover letter, that in its view all necessary environmental information has been submitted with the application.
A statement confirming whether all the required wayleaves have been agreed with the owners and occupiers of the land proposed to be crossed by the line and whether it is proposed that any applications may be made to the Scottish Ministers under paragraph 6 of schedule 4 to the Electricity Act 1989, or that an order is proposed to be made under schedule 3 to the Act; and	The Applicant has engaged in discussions with all identified landowners and occupiers over whose land the Proposed Development would be required to cross. All voluntary wayleaves and tenant consents for 400kV infrastructure for the Proposed Development have now been issued, and a number of agreements are in place. Following submission of the S37 application, 21-day statutory notices will be issued to any affected parties requiring consent who have not returned signed wayleaves or tenant consents. In the event agreement is not received from relevant parties within 21-days of notice issue, the Applicant will apply for a necessary wayleave/tenant consent under paragraph 6 of Schedule 4 of the Electricity Act 1989. For any third party-only access or substation extension consents that are not received voluntarily, orders will be made under Schedule 3 of the Electricity Act 1989. It is the Applicant's intention to continue all voluntary discussions whilst any statutory processes take place.

All other supporting application documents, including a cover letter which includes a description of all of the components of the development requiring consent and deemed planning permission (including the length of the proposed line and its nominal voltage), designed for inclusion in any consent decision.	A list of all documentation submitted in support of this application is included as Annex 1 to this cover letter. This includes further details of the following elements of the EIA Report: - Non-Technical Summary - Volume 1 Main Text - Volume 2 Figures -Volume 3 Appendices - Volume 4 Visualisations A list of Supporting Documents is also included in Annex 1.

Additional Information supporting the application for consent:

The Applicant has prepared a number of Supporting Documents, which are submitted with this application for consent. These documents satisfy the requirement for information in relation to the pre-application consultation measures the Applicant has undertaken in advance of the submission of the application for consent, and also an assessment of the Proposed Development against the provisions of the relevant Development Plan. These include:

- Pre-Application Consultation Report (PAC Report)
- Planning Statement
- EMF Report
- BNG Assessments

Annex 1 to this letter includes a list of all required, and supporting documentation forming part of the application for consent.

The application fee of £34,200 has been paid via BACS transfer with reference number ECU00006380. The Fee has been calculated using the ECU fee calculator based on EIA Development.

We look forward to receiving formal confirmation of receipt of this application. In the meantime, should you have any queries or require further information, please feel free to contact us through the details provided.

Yours sincerely,

Redacted

Alan Graham
Environmental Planner
For and on behalf of SP Transmission

Land and Planning Team
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ANNEX 1 - Cover Letter

VOLUME 1 - Chapters
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Chapter 2 - Approach to EIA
Chapter 3 - Evolution of Design and Alternatives
Chapter 4 - EIA Project Description
Chapter 5 – Planning Policy Context
Chapter 6 - Landscape and Visual
Chapter 7 - Cultural Heritage
Chapter 8 - Biodiversity
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Chapter 11 - Traffic and Movement
Chapter 12 - Noise and Vibration
Chapter 13 - Socio - Economics
Chapter 14 - Forestry
Chapter 15 - Other Matters
Chapter 16 - Cumulative Effects
Chapter 17 - Schedule of Mitigation
Chapter 18 - Summary and Conclusions

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Volume 4 - Heritage - Viewpoint 1b View northeast towards Wester Carmuirs Roman Camp (SM3188) and Lochlands F
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Volume 4 - Heritage - Viewpoint 4 View from Lochlands Roman Camps (SM4259) towards Rough Castle Roman Fort (S
Volume 4 - Heritage - Viewpoint 4 View from Lochlands Roman Camps (SM4259) towards Rough Castle Roman Fort (S
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Volume 4 - Heritage - Viewpoint 5 View from Lochlands Roman Camps (SM4259) towards the ridgeline of on which the

Volume 4 - Heritage - Viewpoint 5 View from Lochlands Roman Camps (SM4259) towards the ridgeline of on which the
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Volume 4 - Landscape - Viewpoint 10 Palacerigg Golf Course and Country Park (Existing)
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Volume 4 - Landscape - Viewpoint 13 Alnwick Crescent, Golfhill, Glenmavis (Existing)
Volume 4 - Landscape - Viewpoint 13 Alnwick Crescent, Golfhill, Glenmavis (Proposed Year 1)

SUPPORTING DOCUMENTS

File name

Cover Letter
Cumbernauld Substation Extension - BNG Assessment
DWNO Final PAC Report_Optimized

DWNO Project EMF Assessment with Appendix A B 2026
EIA - Non Technical Summary
Overhead Line - BNG Assessment
Planning Statement
Substations - BNG Assessment
DWNO EIAR Explanatory Note
CEMP
Initial Peat Management Plan - WB route
Initial Peat Management Plan - ZG - XX - XR
Initial Peat Management Plan - Substations