

Denny to Wishaw Network Upgrade

Environmental Impact Assessment Report

Volume 3 Appendices

Appendix 10.2 SEPA response to Additional Information

May 2026



Prepared for:

SP Energy Networks
320 St Vincent St
Glasgow, G2 5AD

Prepared by:

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1 Tanfield
Edinburgh EH3 5DA
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Appendix 10.2

From: Planning South <Planning.South@sepa.org.uk>
 Sent: 22 January 2026 14:50
 To: DODSWORTH, THOMAS <tdodsworth@spenergynetworks.co.uk>
 Cc: Paul.wilson2@gov.scot; GRAHAM, ALAN <a.graham@spenergynetworks.co.uk>; Nofal, Oli <Oli.Nofal@aecom.com>; Irvine, Alex <Alex.M.Irvine@aecom.com>
 Subject: RE: Denny To Wishaw Network Upgrade (DWNO): Scoping Opinion PCS-20006234

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Report Suspicious

OFFICIAL

Dear Tom Dodsworth,

**Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017
 ECU00006196**

REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION FOR THE DENNY TO WISHAW NETWORK UPGRADE (DWNO) DENNY TO WISHAW NETWORK UPGRADE (DWNO)

Thank you for your email and the information provided, following our response to the ECU request for scoping opinion for DWNO (attached). Please see below our comments on your email.

There is no new data or assessment of the locations in question, but the email gives some more detail about the works intended on or in proximity to the two landfills in question, **Kilgarth** and **Dalmacoulter**. We had identified both these landfills as having been "authorised to accept 'special precautions' waste."

The earlier consultation request had identified that Phase 1 reports were to be carried out at certain locations. We said that: "We would be pleased to comment on the findings and conclusions of any Phase 1 report at the XX route concerning any aspects that it would be prudent to investigate further using radioactive walkover surveys, should this be recommended." This advice remains in place.

The SP Energy email explains that their intended works do not cross the mapped extent of either landfill, and the works that might impinge on the mapped extent of the **Kilgarth** landfill boundary relates only to a trackway. SP Energy stated that existing and new temporary access tracks for the Proposed Upgraded Overhead Lines relating to both **Kilgarth** and **Dalmacoulter** will be plastic trackway approx 4 metres wide laid on the existing ground with no soil stripping required. This is assumed to mean no disturbance of the underlying ground.

Near to **Dalmacoulter**, though, the SP Energy review has identified a separate feature: "A former refuse tip, recorded on 1962 Ordnance Survey mapping, is recorded on site within the vicinity of towers WB001, XX019B and XX019A. As above, no existing towers cross the mapped extent of this former refuse tip." Various access tracks to access towers and a Tensioner will cross this mapped former refuse tip, though, and again, will be surface-laid plastic trackway as noted above.

SP Energy state for Kilgarth that: "Should any earthworks be proposed at this location, or surrounding the current tower locations XX004–XX007, then a watching brief by a suitably qualified geo-environmental/geotechnical engineer is recommended."

The exact same wording is given in the conclusion is given for Dalmacoulter, and we would ask that SP Energy check if this may be a transcription error, and if so, the tower references for Dalmacoulter need to be corrected.

In conclusion, a precautionary approach is still appropriate given that the extents of any earthworks may still change that could involve disturbance of the underlying ground. SEPA agrees that specialist advice should be sought from a suitably qualified geo-environmental/geotechnical engineer if made ground or landfill materials are revealed during earthworks. Further, it is unclear whether the work areas will be fenced off to the public during construction.

Provided that the site is fenced during groundworks and construction in order to ensure that public protection is maintained and that the development is safe and any risks are mitigated, then potential radioactive contaminants shall be considered for worker protection under health and safety legislation during the works and in working procedures for ongoing maintenance. Monitoring may involve walkover surveys prior to undertaking the works and screening during any excavation works undertaken. Any radioactive material or radioactive wastes arising shall be regulated in accordance with the Environmental Authorisations (Scotland) Regulations 2018.

Please do not hesitate to contact me if you require any further clarification.

Regards

Silvia Cagnoni Senior Planning Officer Scottish Environment Protection Agency Buidheann Dion Àrainneachd na h-Alba	
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OFFICIAL

From: DODSWORTH, THOMAS <tdodsworth@spenergynetworks.co.uk>
 Sent: 12 January 2026 14:58
 To: Planning South <Planning.South@sepa.org.uk>
 Cc: GRAHAM, ALAN <a.graham@spenergynetworks.co.uk>; Nofal, Oli <oli.nofal@aecom.com>; Irvine, Alex <alex.m.irvine@aecom.com>
 Subject: Denny To Wishaw Network Upgrade (DWNO): Scoping Opinion PCS-20006234

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od afternoon,

I am writing in relation to the two former official landfills, Kilgarth and Dalmacoulter, referenced in SEPA's Scoping Opinion (Ref: PCS-20006234), attached and below for convenience:

1.3 We highlight a further section of the route that would require to be kept scoped in for further assessment if groundworks are required at that location, namely the section marked as the "XX route" on Figure 2.3. This is because the existing overhead lines pass over two former OFFICIAL landfills known as Kilgarth and Dalmacoulter that were authorised to accept 'special precautions' waste.

1.4 We would be pleased to liaise further with the relevant local authority planning service and applicant at a later stage of the project, given that the scoping report proposes the preparation of individual Phase 1 Geotechnical and Geo-environmental Reports for the project components that include the existing overhead lines on the XX route. The scoping report states in Section 9.5 that "The key impacts arising from these project components would be covered under the Phase 1 Reports, which will accompany each Local Planning application." We would be pleased to comment on the findings and conclusions of any Phase 1 report at the XX route concerning any aspects that it would be prudent to investigate further using radioactive walkover surveys, should this be recommended. We will also be pleased to continue to provide advice and support to the relevant Councils as required with this development.

With respect to the two former official landfills, the following should be noted:

Kilgarth

The former Kilgarth Landfill (Licence number: WML/W/0000071) (Kilgarth L/F Site, Gartgill Road, Coatbridge, North Lanarkshire, ML5 2EQ) is located immediately southeast of the proposed development, adjacent to towers XX004–XX007. The mapped maximum extent of the landfill by SEPA potentially underlies the red line boundary for the XX Route.

The upgrading of an access track, from Gartgill Road to towers XX004 – XX007 along the edge of the mapped landfill is also proposed at this location.

Access tracks are proposed to provide access to the Proposed Upgraded Overhead Lines during construction. All existing and new temporary access tracks for the Proposed Upgraded Overhead Lines will be trackway. These will utilise a plastic trackway laid on the existing ground with no soil stripping required. These access tracks will be approximately 4 metres wide (including construction areas).

Should any earthworks be proposed at this location, or surrounding the current tower locations XX004–XX007, then a watching brief by a suitably qualified geo-environmental/geotechnical engineer is recommended.

Dalmacouther

SEPA states that, "the existing overhead lines pass over two former OFFICIAL landfills known as Kilgarth and Dalmacouther that were authorised to accept 'special precautions' waste." It is not immediately clear which former OFFICIAL landfill 'Dalmacouther' refers to.

An 'Active or recent landfill' known as the Dalmacouther Landfill Site, (Airdrie - A73, Carlisle Road, Airdrie, ML6 7SP) (Licence number: WML/W/000002) is mapped approximately 100 m away from the existing overhead lines, north of the proposed upgraded overhead line XX Route at XX023-XX025 but does not cross the mapped extent of this landfill.

A former refuse tip, recorded on 1962 Ordnance Survey mapping, is recorded on site within the vicinity of towers WB001, XX019B and XX019A. As above, no existing towers cross the mapped extent of this former refuse tip.

Various access tracks proposed to access towers WB001, XX019B, and XX019A, as well as access to the XX019B Tensioner will cross this mapped former refuse tip.

As above, access tracks are proposed to provide access to the Proposed Upgraded Overhead Lines during construction. All existing and new temporary access tracks for the Proposed Upgraded Overhead Lines will be trackway. These will utilise a plastic trackway laid on the existing ground with no soil stripping required. These access tracks will be approximately 4 metres wide (including construction areas).

Should any significant earthworks be proposed at this location, or surrounding the current tower locations XX004–XX007, then a watching brief by a suitably qualified geo-environmental/geotechnical engineer is recommended.

I hope this helps clarify the outstanding points raised in SEPA's scoping response. If you have any further questions, please don't hesitate to get in touch

Kind regards,



Tom Dodsworth | Trainee Environmental Planner
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