

Appendix B Summary of Consultation Responses and Action Taken

Table B-1 Summary of Pre-Application Advice and Actions taken

Consultee	Summary of Response	Actions Taken
Falkirk Council	<u>Bonnybridge Substation</u> Falkirk Council indicated that it would take into account the impacts of the proposal as a relatively small extension to existing infrastructure, rather than as a new standalone facility. The landscape and visual impacts are likely to be largely established; however, opportunities for additional visual containment through new landscaping should still be considered. As the proposals are located within the vicinity of a major accident hazard pipeline, the associated risks and potential impacts will need to be considered. The planning application will be assessed using the Health and Safety Executive (HSE) methodology to inform HSE advice. In addition, development proposals of national or major scale will only be supported where it can be demonstrated that they will conserve, restore, and enhance biodiversity, including the protection and strengthening of nature networks. The following specific application requirements were set out by Falkirk council: • A preliminary ecological appraisal, including protected species surveys. • A tree survey and arboricultural report, as the proposals are expected to affect existing trees. Any loss of safe and healthy trees should be compensated through replacement planting,	Noted. The landscape and visual effects are assessed within Chapter 6 Landscape and Visual of the EIAR, and provides further details on the consideration of landscaping opportunities. The Applicant has undergone consultation regarding the pipeline consultation zone directly with SGN and National Gas Transmission (NGT). In order to assess the impact of the proposed OHL project on NGT's pipelines an Electrical Impact Assessment will be carried out in accordance with NGT methodology. The results of which will be presented to SGN and NGT in consultation. Further information is provided directly in the Applicant Response to SGN and NGT. A Biodiversity Net Gain assessment has been undertaken and is presented in Chapter 8 Biodiversity of the EIAR.

normally comprising similar species and in equivalent numbers to those trees/ hedgerows removed.

- Confirmation that the proposals will not impact a major accident hazard pipeline.
- A planning statement with a statement demonstrating that the proposals constitute essential infrastructure.
- Details of landscaping to visually contain the Proposed Development.
- Demonstrate biodiversity enhancement, conservation and/or restoration.

The following action has been taken regarding specific application requirements from Falkirk Council:

- Bonnybridge substation will be subject to a full ecological assessment, the details of which will be presented in Chapter 8 Biodiversity of the EIAR.
- Individual trees and smaller trees groups, which would be subject to arboriculture impact assessment are scoped out for Bonnybridge Substation.
- As detailed above consultation has taken place directly with SGN and NGT to ensure there are no impacts on the major accident hazard pipeline.
- Landscape proposals will be detailed in Chapter 6 Landscape and Visual of the EIAR and the accompanying Landscape Environmental Management Plan (LEMP)
- A BNG assessment has been undertaken and will be an appendix to Chapter 8 Biodiversity of the EIAR. This will indicate how many biodiversity units are required, and the measures required to deliver biodiversity enhancement.

Falkirk Council

Denny North Substation

This pre-application advice required no further action. The landscape and visual

	For both Denny North Substation and Bonnybridge Substation, Falkirk Council indicated that it would take into account the impacts of the proposal as a relatively small extension to existing infrastructure, rather than as a new standalone facility. The landscape and visual impacts are likely to be largely established; however, opportunities for additional visual containment through new landscaping should still be considered. In addition, development proposals of national or major scale will only be supported where it can be demonstrated that they will conserve, restore, and enhance biodiversity, including the protection and strengthening of nature networks.	effects are assessed within Chapter 6 Landscape and Visual of the EIAR and provides further details on the consideration of landscaping opportunities.
Falkirk Council	As the proposals are located within the vicinity of a major accident hazard pipeline, the associated risks and potential impacts will need to be considered. The planning application will be assessed using the Health and Safety Executive (HSE) methodology to inform HSE advice.	A Biodiversity Net Gain assessment has been undertaken and is presented in Chapter 8 Biodiversity of the EIAR. The Applicant has undertaken consultation regarding the pipeline consultation zone directly with SGN and National Gas Transmission (NGT). In order to assess the impact of the proposed New-build Overhead Line on NGT's pipelines an Electrical Impact Assessment will be carried out in accordance with NGT methodology. The results of which will be presented to SGN and NGT in consultation. Further information is provided directly in the Applicant Response to SGN and NGT.
Falkirk Council (Environmental Health Officer)	Falkirk Council's Environmental Health Officer (EHO) advised that both Bonnybridge Substation and Denny North Substation noise need not be considered a determining factor in considering application. Construction noise hours should only be conducted between the following hours: - Monday to Friday 08:00 - 19:00 Hours - Saturday 08:00 - 13:00 Hours	The construction noise hours are noted and will be adhered to. Should emergency circumstances require it, application will be made to the Environmental Health Officer for prior approval of any works outside of these hours.

	• Sunday / Bank Holiday No noise audible at the site boundary Deviation only permitted with the prior approval of the EHO in emergency circumstances. In the event that contaminated land is encountered during construction all work shall cease, and the planning authority will be notified immediately. Carry out a contaminated land assessment and undertake any all necessary remediation works.	
	No significant local air quality concerns are associated with this application. The Institute of Air Quality Management (IAQM) provides dust management guidance (http://iaqm.co.uk/guidance/) during the construction phase.	All advice regarding contaminated land will be adhered to. The outline CEMP will outline the necessary procedures should contaminated land be found.
North Lanarkshire Council	<u>Easterhouse Substation</u> The following application requirements are specific to Easterhouse substation: • Easterhouse substation lies within both a high and low coal zone risk area and therefore a Coal Mining Risk Assessment is required. • Demonstrate that the Proposed Development will not result in a noticeable increase in parking demand or vehicle movements. • Demonstrate how the development can be integrated into its surroundings particularly in relation to the green belt. • Demonstrate that the development can avoid impacts on the adjacent Site of Special Scientific Interest (SSSI), Site of Importance for Nature Conservation (SINC) or Seven Lochs. • Preliminary ecological assessment and a biodiversity improvement plan, with specific consideration given to SSSI and SINC designations	Noted. Since receipt of comments from North Lanarkshire Council, project design has evolved and subsequently removed a requirement to extend Easterhouse Substation.

- Information on site levels and topography
- The site is subject to the Scottish Environment Protection Agency's (SEPA's) River Flood Medium Risk advice and a SEPA medium surface water advisory probability. These matters must be addressed alongside the requirements of the LDP, including the provision of an appropriate SUDS scheme.

North Lanarkshire Council

Wishaw Substation

The site is located within a largely residential area and lies in close proximity to a new masterplanned residential neighbourhood, which continues to develop. While the Proposed Development may be argued to constitute essential infrastructure, it will need to demonstrate how it can integrate appropriately into its surroundings.. Particular consideration must be given to avoiding detrimental impacts, given that it represents the intensification of an existing use that is not considered ancillary to the predominantly residential character of the area.

It is advised that the red line boundary be reduced to cover only is the land required for the proposed substation extension in order to minimise the loss of open space and avoid the removal of the existing playing field.

Gowkthrapple has been identified as a Strategic Delivery Area,, with a focus on protecting, enhancing and managing existing Green Network infrastructure, while also requiring the provision of new Green Network elements.

The following application requirements are specific to the Wishaw site:

- Matters to be addressed: noise, air quality, fire safety, the water environment and land contamination and including the potential loss of green space

Landscape Character will be addressed within Chapter 6 Landscape and Visual of the EIAR.

The planning statement will address how the Proposed Development will be integrated appropriately into its surroundings.

The red line boundary will include all proposed works and the comment is noted on the reduction of the red line boundary with regards minimising impact on open space. The planning statement will address all planning policies including the Strategic Delivery Area.

- Consideration to the amenity and character of the surrounding residential environment
 - A landscaping scheme of other form of mitigation will be needed to provide effective screening of both the existing and Proposed Development
 - As the agent of change, the Proposed Development may also be required to submit further information on its impacts, particularly in relation to amenity, biodiversity, noise and other relevant considerations.
 - Assessment of impacts on native woodlands, hedgerows, individual trees of high biodiversity value, protected trees and woodland habitats.
- NLC's specific application requirements have been considered and are outlined below:
- All matters were considered within the scoping report. Noise will be covered in Chapter 12 Noise and Vibration of the EIAR. The consideration of both Air quality and Fire Safety as part of Accidents and Major Disasters will be outlined in Chapter 15 Other Environmental Matters of the EIAR.
 - Consideration of amenity and character of the surrounding residential environment will be assessed in Chapter 6 Landscape and Visual of the EIAR.
 - A landscape scheme is not proposed at Wishaw Substation. This has been scoped out in agreement with NLC.
 - This is noted.
 - Woodland habitats were assessed and will be reported in Chapter 8 Biodiversity of the EIAR. Individual trees have been considered for their potential for BNG or bats. While specific surveys for notable trees and hedgerows have not been undertaken it is considered that those of high biodiversity value would be picked up

HES	Historic Environment Scotland: due to the Antonine Wall, Castle to Lime Road, and Field System (SM8244) any new track would need a Scheduled Monument Consent (SMC). They also would be unlikely to grant consent for a permanent access crossing. HES is concerned about widening the track as well because of the proximity to Antonine Wall and asks for pre-application discussions. Since there may be subsurface archaeological deposits as well, an archaeological investigation may be required before development.	as part of the condition assessment during the UKHab surveys. A number of pre-application discussions took place since the receipt of the pre-application advice provided by HES. This included a site visit between the Applicant and HES in which the track crossing was discussed. It was further explained that reuse of the track with minor upgrades would be acceptable, however a new crossing across the Antonine Wall would not be granted consent for a SMC.
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Table B-2 Summary of responses in the Scoping Opinion and Actions Taken

REF	Consultee	Summary of Response	Topic	Actions taken
ECU1	ECU	Scottish Ministers are satisfied with the scope of the EIAR. Mitigation measures should be summarised for significant environmental impacts as a conclusion at the end of each chapter. A consolidated schedule of all mitigation measures proposed, in tabular form, where that mitigation is relied upon in relation to	General	Noted. Mitigation measures will be presented at the end of each chapter as requested. A schedule of mitigation, consolidating all mitigation measures will also be presented within Chapter 17 Schedule of Mitigation and Monitoring EIAR.

		reported conclusions of likelihood or significance of impacts.		The Applicant will ensure ECU is informed of any relevant discussions.
		Ministers requested that they are kept informed of relevant discussions, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage and cumulative assessments.		
ECU2	ECU	The Applicant should contact Scottish Water to make further enquiries to confirm whether there are any Scottish Water assets which may be affected by the Proposed Development and include details in the EIAR of any relevant mitigation measures.	Water Environment	This is noted. No Scottish Water assets are expected to be affected.
ECU3	ECU	Marine Directorate provides generic scoping guidelines for OHL development and advice on how fish populations can be impacted during construction, operation and decommissioning of an OHL in relation to freshwater and diadromous fish and fisheries.	Ecology	Fish populations are not anticipated to be impacted during construction and this will be reported in Chapter 8 Biodiversity of the EIAR.
		In addition to identifying the main watercourses and waterbodies within and downstream of the Proposed Development area, developers should identify and consider any Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.		No Special Areas of Conservation where fish are a qualifying feature have been identified in relation the Proposed Development.
		NatureScot confirms sufficient ornithological data has been collected, specifically for the non-breeding Taiga Bean Goose within the Slamannan Plateau SPA.		As the ECU outlines no additional bird surveys are proposed. The details of ornithological data used will be outlined in Chapter 8 Biodiversity of the EIAR. Additional discussions have been undertaken with NatureScot where necessary.

		Given the limited additional bird interest in the area, no further bird surveys are proposed. Scottish Ministers recommend decisions regarding bird surveys - site specific & cumulative- should be made following discussion with NatureScot.		
ECU4	ECU	Scottish Ministers considered that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk REF5 Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at http://www.gov.scot/Publications/2017/04/8868 , should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.	Geology	Peat probing is currently underway on site. The results of this will inform whether a Peat landslide Hazard and Risk Assessment is required for the site and would be reported within the EIAR as necessary.
ECU5	ECU	The ECU provided guidance on the viewpoints set out for assessment within the LVIA in Figure 5.3 of the Scoping Report.	Landscape	Noted.
ECU6	ECU	The noise assessment should be carried out in line with relevant legislation and standards as detailed in Section 11 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the Institute of Acoustics (IOA) "A Good	Noise	Confirmed – the assessment has been undertaken in line with relevant legislation and standards.

ECU7	ECU	Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise.”. The Scottish Ministers requested that the company assess the impact of the Proposed Development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the Proposed Development is within the consultation zone of any of the following: • a licenced explosives site; • gas (or any other) pipeline; • existing overhead electric lines; • underground cables; • water pipes; and • telecommunications links.	General / Accidents & Disasters	Bonnybridge substation lies within a Pipeline Consultation Zone defined by Falkirk Council in LDP2, the New-built Overhead Line and ZG route both also intersect the Pipeline Consultation Zone in the area between Falkirk and Denny. A Major Hazard Zone is located at Dennyloanhead, approximately 2.5km west of ZG route. The Falkirk Local Development Plan 2 indicates that ZG route travels approximately 450m southwest of an area identified for infrastructure proposals / opportunities. As detailed in the scoping report the number of people exposed to any risk associated with the pipeline consultation zone is not anticipated to increase as a result of the Proposed Development as the construction workforce at Bonnybridge is anticipated to be small. The Applicant has undertaken consultation regarding the pipeline consultation zone directly with SGN and National Gas Transmission (NGT). In order to assess the impact of the proposed Newbuild Overhead Line on NGT's pipelines an Electrical Impact Assessment will be carried out in accordance with NGT methodology. The results of which will be presented to SGN and NGT in consultation. Further information is provided directly in the Applicant Response to SGN and NGT (shown at NGT1 and SGN1 of this Table) There are various lower tier operators registered as Control of Major Accident Hazards (COMAH) regulated sites within 5km: the XX route oversails Inver House Distillers (Airdrie Maturation) ML6 8PL which is an Upper Tier Operator, and Chivas Brother Airdrie is
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				located approximately 400 m west of the XX route. . As detailed in the Scoping Report all COMAH sites are required to comply with COMAH regulations and therefore should have procedures and plans in place in the event of such incidents. Any hazards associated with the COMAH sites are unlikely to be increased by the Proposed Development itself.
ECU8	ECU	A Hazardous Substances Consent is required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997 for flammable, toxic or explosive chemicals stored on site. The substances and the specific quantities requiring a Hazardous Substances Consent are detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 .	Hazardous substances	This comment is noted. Should hazardous substances be stored in such quantities then consent would be sought as required.
FC1	Falkirk Council	Falkirk Council broadly agree with environmental effects conclusions and have no further comments at this stage.	General	No actions required.
NLC1	North Lanarkshire Council	NLC provided a list of developments in proximity to the Proposed Development to be considered as cumulative development.	Cumulative	All developments provided by NLC have been considered and included in the long list for the cumulative assessment if within the Zone of Influence established.
NLC2	North Lanarkshire Council	The EIAR should demonstrate alignment with North Lanarkshire Local Development Plan (2022) (LDP) and relevant Supplementary Guidance, including LDP policies: - PROM LOC4, PROT A/B, EDQ 1-3, and any relevant	General	An assessment against all relevant planning policies and development plans will be set out in Chapter 5 Planning Policy of the EIAR.

		SPG's on biodiversity, flooding, and conservation matters.		
NLC3	North Lanarkshire Council	NLC Water Management - agree with the scoping proposed by the applicant on the condition that all recommendations of the scoping report are complied with. The development crosses multiple watercourses and catchments within North Lanarkshire. The EIAR should include: • Site-specific flood risk assessments. • Assessment of impacts on water quality, hydrology, and aquatic habitats • Compliance with SEPA guidance and NLC's Supplementary Planning Guidance on flooding and drainage – we advised previously that the council's Water Management Team had no comments to add for the Scoping Report. • Whilst we have made some general comments relating to these matters we would expect SEPA to provide more detailed comments on their requirements.	Water Environment	This is acknowledged. Flood Risk Assessments have been prepared for Denny North Substation, Wishaw and Bonnybridge Substation. Chapter 9 Water Environment of the EIAR will include assessment of the impacts on water quality, hydrology and aquatic habitats. SEPA's comments have been addressed within Chapter 9: Water Environment of the EIAR.
NLC4	North Lanarkshire Council -	The Proposed Development intersects or lies adjacent to several designated and non-designated ecological sites, including: • Slamannan Plateau SPA.	Ecology	All relevant ecological designations have been considered in the assessment and include the ones detailed in NLC's scoping response.

		• Woodend Loch SSSI. • Multiple SINCs, LNRs, and ancient woodland areas.		
NLC5	North Lanarkshire Council	NLC note that the Development plan has enhanced requirements for balance between infrastructure development and the protection and enhancement of natural assets - and as such there should be a robust explanation for why less harmful alternatives have not been addressed in relation to substation extensions and associated works to nearby pylons - specifically Cumbernauld and Easterhouse.	Ecology / Alternatives	The approach to alternatives, as well as the route options appraisal, was informed by a number of designated sites including the Slamannan Plateau SPA will be addressed within Chapter 3 Design Evolution and Alternatives in the EIAR - this will cover all ancillary substations. It should be noted that Easterhouse no longer requires an extension.. In terms of Cumbernauld Substation Extension the strategic decisions regarding Cumbernauld and its link to the wider Denny to Wishaw Network Upgrade will be covered within Chapter 3 of the EIAR. A summary has been described in Section 2.5 Design Evolution of this Gate Check Report. Cumbernauld Substation Extension will be subject to a separate Town and Country Planning application, and therefore for a full description of the alternatives considered will be outlined within its own EIAR.
NLC6	North Lanarkshire Council	NLC also require the EIAR to include: • Updated Phase 1 and protected species surveys. • Assessment of potential impacts on qualifying features of designated sites. • Clear demonstration of Biodiversity Net Gain (BNG) within North Lanarkshire. • Consideration of cumulative impacts with other infrastructure projects.	Ecology	• All updated Phase 1 and protected species surveys will be reported in Chapter 8 Biodiversity of the EIAR. • The assessment of potential impacts on qualifying features of designated sites will be detailed in Chapter 8 Biodiversity of the EIAR. • Biodiversity enhancements will be delivered offsite. The biodiversity measures required will be outlined in the BNG report will be attached as an appendix to Chapter 8 Biodiversity of the EIAR and

		NLC highlighted the local designations which from our records that were not included within the scoping report but are with the red line for the Proposed Development site. 77/60B CUMBERNAULD GLEN: VAULT GLEN (EAST) - Woodland, Geological interest 77/48A DOUGLAS GLEN Woodland -felled 87/07 GARBETHILL MOOR Peatland 76/69 CAMERON GLEN (east) Woodland, wetland 76/42B SHANK BURN EAST: BRAKENHIRST PLANTATION Woodland 85/06 GREENHEAD MOSS Wetland, peatland, shelterbelt, woodland, meadows - mixed habitats 77/65B PALACERIGG COUNTRY PARK (East)		it is expected that BNG will be secured via a planning condition. The cumulative impacts with other infrastructure projects will be detailed in Chapter 16 Cumulative Effects of the EIAR. All local designations identified by NLC will be included as part of the ecology assessment within Chapter 8 Biodiversity in the EIAR as requested.
NLC7	North Lanarkshire Council -	NLC's Environmental Health Officer (EHO) Generally agreed with the scope of works regarding potential ground contamination at a site near Gowkthrapple Substation, Wishaw which is a former Smiths Clockworks. Advised that the applicant should consult with SEPA at radioactivesubstance@sepa.org.uk,	Ground Conditions	The Applicant has undergone consultation with the radioactive substances department of SEPA. Following this ground contamination surveys were carried out. These surveys indicated limited contamination potential.
NLC8	North Lanarkshire Council -	The Scoping Report proposes to scope out the uprated overhead lines (XX and XR routes) and substation works at Easterhouse and Wishaw from the LVIA. However, we would note: Tree removal and access improvements may result in permanent or long-term changes to landscape character.	Landscape and Visual	Further information was provided to NLC to explain the LVIA approach set out in the Scoping Report. The majority of potential impacts on landscape character and visual amenity for the uprating works are temporary in nature and of short duration, and are related to construction operations. Following this it was agreed with NLC that it was appropriate to scope out Wishaw and Easterhouse and the uprated XX and XR routes from the landscape and visual assessment.

		Visual impacts may affect sensitive receptors in Glenmavis, Chapelhall, Newarthill, and surrounding communities. The EIAR should also include a proportionate LVIA of the uprated overhead lines and substation works within North Lanarkshire, particularly where works may alter landscape character or affect visual amenity.		
NLC9	North Lanarkshire Council -	The EHO noted that within the report that any planner extension/changes to existing substations would be subject to specific local planning applications and associated noise assessments where necessary. Also acknowledged additional noise sources from overhead lines and construction activities. Long standing guidelines on noise from construction site activities which require noise from activities be restricted to the following days and times: 08:00 hours to 19:00 hours Monday – Friday, 08:00 hours to 13:00 hours Saturdays, with no noise producing works undertaken on Sundays and Public Holidays which all development sites are expected to adhere to. Welcomed the proposed mitigation measures and would promote best practice of providing advance notice to residential neighbours who could be impacted by works.	Noise and Vibration	Noted.
NLC10	North Lanarkshire Council -	Regarding historic environment information, the Scoping Report is professional and competent but	Cultural Heritage	1 and 2) These have been addressed with in the baseline of Chapter 7 Cultural Heritage of the EIAR.

lacked detail on the nature of the proposed mitigation. Recommended:

- 1) A desk based assessment combined with a map regression using Roy's map;
- 2) A walkover survey to confirm the nature of the identified assets and any new ones;
- 3) Demonstration of Scheduled Monument Consent for any physical impacts on Scheduled Monuments;
- 4) Fencing of Scheduled Monuments in the immediate environs of development to prevent inadvertent damage;
- 5) A 7% ground breaking evaluation of any areas not subsequently disturbed by later activity outside Scheduled Monuments and Antonine Wall Buffer zones with scanning of spoil heaps to recover lithics;
- 6) Targeted metal detection survey;
- 7) Within the Antonine Wall Buffer Zone 100% strip and map with proposals for resultant excavation and processing;
- 8) Should any of the above stages identify significant archaeological remains these should be subject to further works such as excavation, post-excavation analyses, publication and archiving.

All the above should be detailed in a programme of works to be agreed by North Lanarkshire Council.

The XX and XR routes pass near listed buildings, conservation areas, and scheduled monuments, including the Antonine Wall World Heritage Site Buffer Zone. We would note that the EIAR should assess: Potential setting impacts from uprated lines and substation works.

3, 4, 7 and 8) These will form mitigation measures will be outlined in Chapter 7 Cultural Heritage of the EIAR
5 and 6) These will entail the evaluation phase which will inform mitigation section of Chapter 7 Cultural Heritage of the EIAR.

The XX and XR route, including the physical impacts and potential setting impacts will be included within Chapter 7 Cultural Heritage of the EIAR and various discussions between the Applicant's consultant and Historic Environment Scotland and NLC's planning officers have taken place to discuss appropriate mitigation.

		Physical impacts from construction access and ground disturbance. Appropriate mitigation and consultation with Historic Environment Scotland and NLC's planning officers. Whilst we have made some general comments which relate to Heritage Assets Building, World Heritage Sites and Scheduled Monuments we would expect Historic Environment Scotland to respond in more detail on these matters.		
NLC11	North Lanarkshire Council -	The councils Infrastructure and Transportation Service had no comments to make.	Traffic and Movement	No actions required.
NLC12	North Lanarkshire Council -	The project traverses' areas with high deprivation (Scottish Index of Multiple Deprivation - SIMD), recreational assets (e.g. Palacerigg Country Park), and proximity to COMAH sites (e.g. Inver House Distillers). (recent planning permissions are listed within Appendix 1). We would suggest that the EIAR should consider matters such as: • Assessment of socio-economic impacts, including community amenity and access. • Consideration of health and safety risks near sensitive industrial sites. • Engagement with local communities and recreational stakeholders.	Socio-economics and Recreation	Chapter 13 Socio-Economics and Recreation of the EIAR will consider any areas of high deprivation, recreational assets, community amenity and access. As detailed in the Scoping Report all COMAH sites are required to comply with COMAH regulations and therefore should have procedures and plans in place in the event of any incidents. Any hazards associated with the COMAH sites are unlikely to be increased by the Proposed Development itself. The CEMP for the Proposed Development will consider and set out management practices for health and safety risks including consideration of COMAH sites, as appropriate. The PAC report considers engagement with local communities and recreational stakeholders.

		NLC highlighted that Gowkthrapple Substation and its associated infrastructure could be associated with visual effects within the Gowkthrapple area. Proposals at the Cumbernauld and Easterhouse substations should also demonstrate a clear commitment to minimising impacts on surrounding natural assets. Our records show that this proposal could impact on the following: Palacerigg Country Park, Drumpellier Country Park, Greenhead Moss Community Park.		Wishaw substation (referred to as Gowkthrapple Substation in NLC's response) will be considered in the Landscape and Visual Assessment (LVIA) in Chapter 6 Landscape and Visual of the EIAR. Natural assets will be considered within Chapter 8 Biodiversity of the EIAR.
NLC13	North Lanarkshire Council -	We would raise concerns regarding the assessment of the Cumbernauld Substation within the Environmental Impact Assessment. While the substation faces an urban area to the north, it is otherwise predominantly surrounded by woodland. This woodland forms part of a wider ecological network, bordering Palacerigg Country Park, Glencryan Woods—designated as a Site of Importance for Nature Conservation— and Forest Wood Nature Reserve, which is managed by the Scottish Wildlife Trust. Given the proximity to these valued natural assets, the assessment should more clearly acknowledge the sensitivity of the surrounding environment and demonstrate how potential impacts have been minimised. The proposals must be considered in the context of their cumulative effect on biodiversity and landscape character, and should reflect the principles of the Development Plan in addressing the climate and nature crises.	Forestry / Biodiversity	Cumbernauld substation will be addressed through a separate EIAR and is not considered as part of the Section 37 so is not required by the Gate Check Report. However, the sensitivity and magnitude criteria will be applied and will address the connectivity of the woodland habitat. This will include any designations and will be covered by the respective Biodiversity and Forestry chapters of the EIAR.

HES1	Historic Environment Scotland (HES)	HES supports the inclusion of cultural heritage and archaeology in the EIA but requests clarification on the methodology used in the assessment. HES is satisfied with scope and pre-application consultation so far. They request the HES/NatureScot EIA Handbook is included in the referenced guidance materials, as well as the use of proper Scottish terminology: "Inventory Gardens and Designed Landscapes" instead of "Registered Parks and Gardens", and "Cultural Significance" instead of "heritage value". HES also emphasises assessing Antonine Wall World Heritage Site impacts on its Outstanding Universal Value, and that this should be in a separate appendix.	Cultural Heritage	Noted. The guidance materials requested will be referenced in Chapter 7 Cultural Heritage. A Heritage Impact Assessment has been undertaken to assess the impacts to the Antonine Wall World Heritage Site and will be provided in a separate appendix within Volume 3 Appendices to accompany Volume 1, Chapter 7 Cultural Heritage of the EIAR.
HES2	HES	HES emphasises that the project should aim to avoid physical impacts on nationally important historic environment assets, particularly scheduled monuments protected under law. They stress that all works, including advanced site investigations, must seek to minimise direct impacts on these sites and that contractors should be made aware of this. If any works are necessary on infrastructure within the curtilage of a scheduled monument, Scheduled Monument Consent will be required, and HES recommends early pre-application discussions to agree on an appropriate methodology.	Cultural Heritage	It is acknowledged that Scheduled Monument Consent will be required within the curtilage of scheduled monuments. SPEN are in dialogue with HES on all elements of works relating to Scheduled Monuments and shall submit applications to HES for Scheduled Monument Consent as required. To ensure contractors avoid impacts to these sites, the mitigation presented in Chapter 7 Cultural Heritage will be required. The Applicant has been engaging in early pre-application dialogue with HES throughout the EIA process and this has included discussion around advanced site investigations. This has entailed a site visit, meetings and email correspondence.
HES3	HES	HES emphasises the need to carefully reduce and avoid impacts on the settings of heritage assets during the project design. They advise against using	Cultural Heritage	The settings impacts will be reported in Chapter 7 Cultural Heritage of the EIAR and will use the methodology described.

		arbitrary study areas and instead recommend identifying assets at risk through a ‘bare earth’ Zone of Theoretical Visibility (ZTV). They expect the EIA to clearly justify which assets require detailed assessment, including those with important long-distance views. HES recommends following the Managing Change in the Historic Environment: Setting guidance, carry out on-site setting assessments, and use a clear, systematic framework to evaluate setting impacts. They also highlight that views toward assets may extend beyond the ZTV and should be considered where relevant.		
HES4	HES	HES recommends visualisations be produced for assets with potential moderate or major effects, starting with wireframes to identify significant impacts and possible design mitigation. Photomontages should be prepared if impacts are significant. Early wireframes will help refine the assessment and scoping of visual impacts. HES offer to discuss further as the EIA progresses.	Cultural Heritage	Visualisations will be prepared to accompany Chapter 7 Cultural Heritage of the EIAR for the New-build Overhead Line and will be presented in the Visualisations chapter. Photomontages and wireframes will also be prepared.
HES5	HES	HES highlights the potential for significant adverse impacts on several assets but notes that without an initial assessment, they cannot comment on the scope of assets or visualisations for the EIA report. HES welcome ongoing consultation and the applicant’s engagement with Scheduled Monument Consent pre-application processes.	Cultural Heritage	Noted. The results of the assessment will be reported in Chapter 7 Cultural Heritage of the EIAR.
HES6	HES	Historic Environment Scotland discusses how because of the Antonine Wall, Castle to Lime Road, and Field System (SM8244) any new track would need an SMC. They also would be unlikely to grant consent for a permanent crossing. HES is concerned	Cultural Heritage	A number of pre-application discussions have taken place between HES and the Applicant regarding this matter. This included a site visit between the Applicant and HES in which the track crossing was discussed. It was further explained that reuse of the track with

		about widening the track as well because of the proximity to Antonine Wall and asks for pre-application discussions. Since there may be subsurface archaeological deposits as well, an archaeological investigation may be required before development.		minor upgrades would be acceptable, however a new crossing across the Antonine Wall would not be granted consent.
SEPA1	Scottish Environment Protection Agency (SEPA) -	SEPA encouraged further pre-application dialogue, particularly after initial surveys such as peat probing and habitat assessments are completed. The advice provided assumes that the development falls within key categories as defined in National Planning Framework 4, including under Policy 5 Soils and 22 Flood Risk and Water Management, as well as considering that it also is covered by requirements in Policies 2 Climate mitigation and adaption 3 Biodiversity and 11 Energy. SEPA stressed the importance of including detailed scale drawings in the EIA submission that highlight environmental sensitivities like peat depth, condition, groundwater-dependent ecosystems, and proximity to waterbodies to effectively guide the design process to avoid, reduce, and mitigate impacts.	General	Further pre-application dialogue has been undertaken with SEPA on a number of topics raised in the scoping opinion which can be seen in Section 3.6 of this Gate Check Report. Volume 1, Chapter 5 Planning Policy of the EIAR will detail all applicable planning policies including the ones mentioned. All relevant environmental considerations will be detailed in the figures which will accompany the application in Volume 3 Figures of the EIAR. Throughout the EIA process relevant environmental considerations have been used to inform the design process and will be outlined in the design interventions highlighted in Volume 1, Chapter 3 Evolution of Design and Alternatives in the EIAR.
SEPA2	SEPA	Site layout: 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information.	General	All the necessary requested details will be provided within the figures contained within Volume 3, Figures of the EIAR.

SEPA3	SEPA	1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.	General	Due to inclusion of spurs and loops in this comment it may represent a standard response for wind farms and so may not be relevant to the context of the New-build Overhead Line. The New-build Overhead Line was designed to be as direct as possible taking account of environmental and technical constraints. Access to working areas has been designed to be as direct as possible utilising existing access points and tracks. This will be described in Chapter 3 Evolution of Design and Alternatives of the EIAR.
SEPA4	SEPA	1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development haven't avoided for example near-natural peatland, adequate justification should be provided for the proposed layout. The justification should include how any impacts are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by maps with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.	Alternatives	All alternatives considered through the design process have been considered as appropriate within Chapter 3 Design Evolution and Alternatives of the EIAR.
SEPA5	SEPA	SEPA reviewed the scoping report prepared by AECOM and noted that desk studies will be conducted for the cable route, involving overhead and underground cables and substations. Historical	Geology	Radioactive walkover surveys were conducted as required at Wishaw substation. These surveys demonstrated safe levels of radioactivity.

maps and contamination hazards were assessed, with potential radioactive contamination flagged near the Wishaw substation due to proximity to a former clock factory. SEPA advises the applicant to consult previous responses and maintain communication with SEPA and local authorities if the route changes. SEPA highlighted that the XX route is required to be scoped into the assessment if groundworks are required. This is because the existing overhead lines pass over former landfills, Kilgarth and Dalmacoulter that were authorised to accept 'special precautions waste'. SEPA expresses willingness to collaborate on Phase 1 Geotechnical and Geoenvironmental Reports and suggests radioactive walkover surveys if deemed necessary. Ongoing support and advice will be provided to local councils as the project progresses.

Further consultation was undertaken with SEPA to understand the extent of the former landfills at Kilgarth and Dalmacoulter.

Following a technical review, it was considered that an 'Active or recent landfill' known as the Dalmacoulter Landfill Site, (Airdrie - A73, Carlisle Road, Airdrie ML6 7SP) (Licence number: WML/W/00002) was mapped approximately 100m away from the existing overhead lines, north of the proposed uprated 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, XX019A as well as access to XX019B Tensioner was cross this mapped former refuse tip.

The former Kilgarth Landfill (Licence number: WML/W/0000071) (Kilgarth L/F Site, Gartgill Road, Coatbridge, North Lanarkshire, ML5 2EQ) is located to the immediate 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.

				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 significant earthworks be proposed at this location, or surrounding the current tower locations XX004 – XX007, then a watching brief by a suitable qualified geo-environmental/geotechnical engineer is recommended. The Phase 1 Geotechnical and Geoenvironmental Report will be provided as an appendix in Volume 3, Technical Appendices. The Applicant has undertaken further consultation with SEPA since the scoping opinion.
SEPA6	SEPA	Where proposals are on peatland or other carbon releasing soils (CRS), the following should be submitted to address our requirements in relation to NPF4 Policy 5 CRS and the ecosystem services they provide (including water and carbon storage).	Ground conditions	A Peat Management Plan will be submitted alongside the application.
SEPA7	SEPA	Assessment to inform careful project design needs to be demonstrated, in accordance with relevant guidance and mitigation hierarchy in NPF4.	Planning Policy	Volume 1, Chapter 5 Planning Policy of the EIAR details considerations from a planning policy perspective particularly in relation to NPF4.

SEPA8	SEPA	The layout and design of the development must avoid adverse impacts on groundwater dependent terrestrial ecosystems. A phased approach to the assessment of risks to Ground Water Dependent Terrestrial Ecosystems (GWDTE) and groundwater abstractions.	Water Environment/ Ecology	Groundwater dependent terrestrial ecosystems have been considered as part of the EIAR with the results detailed in Chapter 8 Biodiversity of the EIAR
SEPA9	SEPA	3. Water environment 3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors. 3.2 The submission must include a set of drawings showing: a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies. b) The minimum buffer around each waterbody, as detailed in Table 1 of Recommended Riparian Corridor Layer for use in Land Use Planning, from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is	Water Environment	Chapter 9 Water Environment of the EIAR will consider the impacts on local hydrology, water environment and flood risk. The following actions and approaches relate to the section 3.2 of SEPA's response regarding the submission of drawings: • These drawings will be included in Volume 3: Figures • In consultation with SEPA it was agreed that the provision of photographs for each watercourse would not be required. To ensure that the level of survey effort remains proportionate to the potential environmental impact. Accordingly, we propose to provide the following for each crossing point and breach of the buffer: – A reference number corresponding to its location on a plan, – An estimate of the waterbody's width, – Drawings of any proposed engineering works, – Justification where the minimum buffer cannot be maintained, along with proposed mitigation measures to protect the waterbody.

		proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature. c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved. 3.3 Further advice and our best practice guidance are available on our sepa.org.uk/regulations/water/engineering/ webpage. Guidance on the design of water crossings can be found in the Construction of River Crossings Good Practice Guide.		No borrow pits are proposed as part of the development.
SEPA10	SEPA	SEPA issued the following standard advice on flood risk: Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information provided to justify smaller structures. Our Climate change allowances for flood risk assessment in land use planning guidance sets out required allowances for climate change. Where it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. The Flood Risk Assessment should address: a) All existing watercourses and drains on the site are fully identified and flow pathways understood in	Flooding	In terms of any crossings the Contractor will be responsible for managing the installation of the crossing and following the CEMP and CAR license / EASR permit. All points will be accounted for in the Flood Risk Assessment which will be an Appendix to Chapter 9 Water Environment of the EIAR.

relation to the 1 in 200 year plus climate change flood levels for the catchment.

b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.

c) Demonstration there is no increased flood risk to existing properties in the vicinity of the Proposed Development and, if possible, demonstrate an improvement.

d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.

e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.

Unable to accept landraising in a flood risk area unless it is required for development outlined under the exceptions of Policy 22a of NPF4.

SEPA11 SEPA

Policy 3 of the NPF4 requires all EIA developments to conserve, restore and enhance biodiversity including nature networks so they are in a better state than without intervention. Potential negative effects should be fully mitigated prior to any biodiversity enhancement which would form additional mitigation.

SEPA provided data on the riparian planting which would be most beneficial and would welcome such planting as part of the BNG proposals.

Biodiversity

The requirements of NPF4 have been accounted for in the EIAR.

Biodiversity enhancements are considered after any residual effects of the Proposed Development and are reported within Chapter 8 Biodiversity of the EIAR.

This dataset has been considered when determining the BNG proposals.

SEPA12	SEPA	Avoid large scale felling of forestry, as this can result in waste material and peak in a release in nutrients. Include drawings of felling boundaries and proposals for use of timber in line with guidance provided.	Forestry	Areas requiring felling and extended management felling will be detailed in Chapter 14 Land Use, Forestry and Agriculture of the EIAR. Potential for forestry waste to be discussed within Volume 1, Chapter 14 Land Use, Forestry and Agriculture of the EIAR.
SEPA13	SEPA	Pollution prevention and environmental management: Must include schedule of mitigation, including reference to best practice pollution prevention and construction techniques and regulatory requirements. A commitment must be included in the schedule of mitigation that micro-siting will not encroach on sensitive areas to avoid adversely affecting mitigation measures identified in the EIAR that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).	General	A schedule of mitigation will be provided within a dedicated chapter. This will be contained within Volume 1, Chapter 17 Schedule of Mitigation and Monitoring of the EIAR. Micro-siting will not be relevant to this application. The avoidance and minimisation of adverse effects on sensitive receptors has been informed by the EIAR.
NS1	NatureScot	NatureScot signalled to standard advice available at https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents as well as pre-application guidance at https://www.nature.scot/doc/naturescot-pre-application-guidance-onshore-wind-farms including information on recommended survey methods, sources of further information / guidance, methods of assessment, and data presentation, as well as guidance on biodiversity enhancement.	Ecology	This advice has been considered within the Ecology assessment in Chapter 8 Biodiversity of the EIAR.

NS2	NatureScot	NatureScot are happy with SPEN's approach to consultation. NatureScot advised that both the New-build overhead lines and the uprated lines should be assessed. NatureScot noted that the BNG assessment is not proposed for the Uprated Overhead Line and therefore Habitat Condition Assessments are not required. NatureScot agreed with the protected areas (Slamannan Plateau Special Protection Area (SPA), Firth of Forth SPA, Woodend Loch Site of Special Scientific Interest (SSSI), Bishop Loch SSSI) have been identified to be included in the Ecological surveys and with suggested survey types. NatureScot valued that no part of the Proposed Development intersects with the Slamannan Plateau SPA/SSSI Slamannan Plateau Special Protection Area: sufficient data has been collected for Taiga Bean Geese so there is no need for further survey work.	Ecology	It is acknowledged that NatureScot are content with the Applicant's approach to consultation
NS3	NatureScot	NatureScot noted the presence of two localised areas of Class 1 peat present beneath the New-build Overhead Line to the east of Cumbernauld Substation and acknowledge that peat depth surveys will be undertaken to inform avoidance of the deepest peat areas.	Peat	As acknowledged by NatureScot peat surveys are currently being carried out and will be reported in the EIAR. A Peat Management Plan will be submitted with the S37 application.
NS4	NatureScot	Advised that a Bird Protection Plan is required to avoid disturbance during the general breeding season, with nest monitoring and avoidance measures.	Ornithology	Impact avoidance and mitigation to avoid disturbance during the general breeding seasons with nest monitoring and avoidance measures will be detailed in Chapter 8 Biodiversity of the EIAR. It is likely that the

				Bird Protection Plan will be required as a condition if planning permission is granted.
NS5	NatureScot	Welcomed the use of eDNA surveys for great Crested Newts across project components.	Ecology	Noted.
NS6	NatureScot	Agreed that Otter species protection plan and pre-construction surveys are required based on evidence of presence of set out in otter surveys conducted in 2022.	Ecology	Note. Otter Species Protection Plans would be prepared in advance of the construction works.
NS7	NatureScot	Supported a second Water Vole survey and noted that in areas such as Easterhouse fossorial water voles populations inhabit grassland areas away from main watercourse which needs to be considered for in surveys.	Ecology	No second water vole survey was undertaken due to the lack of water vole evidence identified and the sub-optimal habitat present. Whilst no surveys have targeted fossorial water vole populations specifically, other surveys taking place in grassland areas would likely identify any fossorial water vole populations. The results of the water vole surveys will be reported in Chapter 8 Biodiversity of the EIAR.
NS8	NatureScot	NatureScot agreed that pre-construction surveys for Badger and Pine Marten were required, and that species protection plans and licences might be necessary.	Ecology	Pre-construction surveys will be detailed in Chapter 8 Biodiversity of the EIAR. Should species protection plans be required these will be reported.
NS9	NatureScot	Agreed that further bat surveys to confirm absence/presence are needed where trees or structure suitable for bats are identified. Acknowledged that minor impacts could be those of value to foraging and commuting which can be mitigated by standard measures.	Ecology	Noted.

SF1	Scottish Forestry	A Forest Plan will be prepared in consultation with Scottish Forestry, it will include clear objectives for biodiversity, timber production, recreation, climate resilience, clear rationale for the timing and phasing of infrastructure felling, management and ongoing felling and restructuring activities and compensatory planting. Scottish Forestry advised on the felling requirements to fulfil and ensure an offence isn't committed under the Forestry and Land Management (Scotland) Act 2018, outlining felling permissions and exemptions, restocking requirements and enforcement methods. This included details on the compensatory planting requirements under the Control of Woodland Removal Policy.	Forestry	Further consultation between the Applicant and Scottish Forestry has taken place regarding the provision of a Forest Plan. Chapter 14 Land Use, Forestry and Agriculture of the EIA identifies necessary tree removals to facilitate the installation of infrastructure. Tree removals will be compensated for by off-site compensatory planting, which will likely be subject to a design and management plan. The consideration for any extended management felling will be made. Any extended management felling would constitute advice to the landowner and therefore cannot be enforced by the Applicant. Should landowners choose to implement this advice, replanting would occur in situ, potentially with commercial crops or for other objectives, but with a newly established windfirm edge. Any compensation to landowners and associated restocking would be discussed directly with landowners outside of the EIA process. The activities would still require a felling licence and would be subject to conditions attached by Scottish Forestry. In effect, each area of felling will have an associated forest plan, including compensatory planting. However, due to the scale of the project and the number of landowners involved, and integrated forest plan covering the entire overhead line route is not feasible.
BHS1	British Horse Society (BHS)	BHS acknowledges the opportunity to respond to the scoping opinion and highlighted their commitment to protecting horse welfare, safety, and access.	Socio-Economics and Recreation	The Land Reform Act (Scotland) has been taken into account when assessing effects on access, including core paths, as part of the socio-economics and recreation (including human health) assessment (this

BHS emphasised the importance of safe off-road riding routes, who have equal access rights under the Land Reform Act (Scotland). They stressed that equestrian needs should be considered early in infrastructure planning to preserve and enhance access. BHS highlighted the opportunities to improve paths and tracks with suitable surfaces like consolidated whin dust and avoiding obstacles such as locked gates or inaccessible deer grids. They offered support and guidance to the applicant on accommodating equestrian and other outdoor access users.

BHS highlighted that safe off-road riding routes are crucial for horse and rider wellbeing, noting that equestrians are vulnerable road users with a higher accident risk, especially on minor roads. They stressed the need to prioritise off-road access in rural areas with high horse ownership. They also advised that site traffic should be made aware of equestrians on roads, enclosing guidance for drivers of large vehicles to mitigate risks.

BHS highlighted that Scotland's equestrian industry contributes over £300 million annually to the rural economy. Growing horse numbers and riding activity, access to riding routes is vital. The loss of access has caused 27% of riders to give up their horses, which could negatively impact the local economy. They offered to discuss equestrian needs further.

BHS provided guidance for drivers of large vehicles to safely interact with horses on the road. Horses are naturally nervous of large vehicles due to unfamiliarity, noise (especially air brakes), and proximity, which can cause panic and accidents.

will be presented within Chapter 13 of the EIAR). All other points have been noted.

		BHS requested that drivers slow down to 10mph or less, avoid sudden noises, stop and turn off the engine if the horse is nervous, pass wide (at least 2 meters) and slow, and be patient. Precautions help keep horses and riders safe by allowing space to find safe passing spots on narrow roads.		
BT1	British Telecommunications plc	BT has reviewed the proposal in relation to electromagnetic compatibility (EMC) and potential interference with its point-to-point microwave radio links. They share that the proposal could cause interference with current and planned radio network. BT requires details of any new (including temporary) structures, their heights, and coordinates to assess impact. A minimum clearance of 100m from any structure to the radio link path is required. Since spectrum use is dynamic, BT requests ongoing consultation if there are changes during the planning process as there may be new links assigned by Ofcom over its duration.	General	In further correspondence the Applicant provided the tower heights of all existing and proposed towers to BT. No further response was received from BT.
MOD1	Ministry of Defence	Ministry of Defence (MOD) are reviewing the proposal. The primary MOD concern is the potential physical obstruction posed by tall and/or narrow lattice towers over 50 meters in the UK Military Low Flying System's designated Low Flying Area 16 (LFA 16). This area is used for low level flight training, and any tall structures could interfere with aircraft operations. As no precise heights or locations have yet been provided, the current feedback is limited to the overall principles of the development. The MOD emphasizes that they must be consulted on the specific parameters—such as the locations, heights,	Heights of Design	The Applicant provided additional information on the parameters of the towers for the Proposed New-Build Overhead line and the Proposed Upgraded Lines. Based on this MOD expressed that at this early stage of consultation their representation is limited to the principle of the Proposed Development and they have concerns and request to be consulted at all future stages in order to complete a full detailed safeguarding assessment. As such the Applicant will ensure that updated information is shared as the design progresses.

		dimensions, and materials of the structures—throughout the future stages of the project, as any changes to these details might affect safeguarded defence assets or capabilities.		
HSE1	Health and Safety Executive	HSE states that the development does not involve hazardous substances in quantities that would pose major industrial accident risks and is not located within safeguarding zones for explosives or dangerous goods. However, the development site intersects with multiple major accident hazard pipelines, raising potential safety concerns during construction and operation. The HSE recommends consulting pipeline operators to address restricted areas, pipeline integrity, and protective measures. While the development does not necessitate consultation with the HSE Land Use Planning Team, the EIA should address any potential risks or consequences related to nearby major accident hazard establishments.	Safety / Major Accidents and Disasters	As requested, pipeline operators have been consulted and the details of this consultation can be viewed for consultee 'SGN' and 'NGT' within this table. No further potential risks from nearby major accident hazard establishments have been identified since the scoping report.
JRC1	Joint Radio Company Limited	JRC objects to the Proposed Development due to insufficient information. They require detailed data on turbine locations (NGR coordinates), hub heights, and rotor diameters to assess potential interference with energy industry radio systems. Without this information, they cannot complete their assessment. JRC is willing to cooperate with developers to resolve issues once the required details are provided. The objection will be withdrawn after a successful analysis or mitigation agreement.	General	It is understood that the reference to turbine locations has been made in error by the JRC and that instead JRC are referring to tower locations. In further correspondence the Applicant provided the tower heights of all existing and proposed towers to JRC as well as further clarification.
NGT1	National Gas Transmission	National Gas Transmission (NGT) operates a high-pressure gas pipeline (FM10 Limrerigg to Glenmavis) crossing the Proposed Development site, which	General	The Applicant has undertaken consultation regarding the pipeline consultation zone directly with SGN and National Gas Transmission (NGT). In order to assess

		could be affected by AC/DC interference from the installation. There is a land easement prohibiting any development, construction, or landscaping within its boundaries without formal written approval from NGT. Electrical infrastructure near the pipeline must comply with specific interference standards, allowing installations adjacent to but never within the easement. NGT also state that utility crossings are restricted and require a Deed of Consent before any installation/construction within the pipeline easement is permitted.. The developer must engage early with NGT to agree on interference mitigation, security, access, and construction methods prior to starting works. The proposed work location falls within the NGT High Risk zone, meaning a project cannot proceed without further assessment from their Asset Protection team. It is required to submit plans and a description to NGT for review (response within 28 days) and check if you need to consult the HSE Land Use Planning (LUP) App, which may be a mandatory requirement for some works. NGT's initial consultation response to the Scoping Report stated development MUST NOT PROCEED without further assessment from NGT.		the impact of the proposed New-build Overhead Line on NGT's pipelines an Electrical Impact Assessment will be carried out in accordance with NGT methodology. The results of which will be presented to SGN and NGT in further consultation. Further information is provided directly in the Applicant Response to SGN (see SGN1 in this table). Any required consents will be sought before any works commence. The applicant confirmed an Electrical Impact Assessment is being undertaken, which shall be forwarded to National Gas Transmission when available. Thereafter, NGT confirmed in writing to ECU they have 'no objection' to the project subject to a planning condition.
NAT1	NATS Safeguarding	NATS (En Route) Public Limited Company (NERL) has reviewed the Proposed Development and determined that it does not conflict with their technical safeguarding criteria, and therefore, they have no objections to the proposal. However, this response is	General	No actions required.

		specific to the current consultation and reflects NATS's position based on the provided information, so any changes to the proposal must be re-submitted for their review as a statutory consultee before any planning permission or consent is granted. Additionally, NATS clarifies that this response does not represent the views of other parties such as airports or airspace users, and it is the responsibility of the Local Planning Authority to ensure all relevant consultees are appropriately consulted.		
NR1	Network Rail	Network Rail's response advises that the scoping opinion for the Denny to Wishaw Network Upgrade must address potential impacts on rail operations during construction and once the project is completed. They emphasise that the opinion should include a Traffic Assessment to evaluate the effects of construction traffic on existing flows and the public road network. Additionally, preferred construction traffic routes should be clearly indicated to allow for an assessment of any interactions with Network Rail's infrastructure, such as potential crossings over or under the railway. Details of any proposed construction or engineering works adjacent to or over the railway corridor must be provided, as these will be subject to further discussion and agreement with Network Rail.	Traffic and Transport	Noted.
ONR1	Office for Nuclear Regulation	The Office for Nuclear Regulation (ONR) has no comments on the planning application because the development is outside the consultation zones of any GB nuclear sites.	General	No actions required.
SGN1	Scottish Gas Network	SGN confirmed the presence of High Pressure Gas Transmission Pipeline in the vicinity of the Proposed	General	The Applicant has undertaken consultation regarding the pipeline consultation zone directly with SGN and

		Development. The building proximity distance for high pressure gas pipeline E05 is 15 metres, in accordance with the recommendations of The Institution of Gas Engineers document TD/1 Edition 5. SGN formally object until a detailed consultation has taken place, as the proposed route crosses many different pipelines multiple times. SGN state a site meeting is required with them to identify pipeline locations and to discuss possible pipeline safety measures. SGN have attached their mains records of the area for guidance. Service pipes, valve siphones, stub connections etc are not shown as well as other GTs, private pipes are not included. SGN provides their general conditions and contact details. SGN withdrew their objection to the project as they have been consulted with by the developer, who have agreed to consult SGN throughout the process. Further consultation may be required if the extent or design of the project changes. Excavations, stockpiling of material, vehicles crossing over the route of the pipeline, changes in ground levels, drilling, piling and the siting of temporary structures, cabins and containers are all activities that can have a negative impact on the pipeline.		National Gas Transmission (NGT). In order to assess the impact of the proposed New-build Overhead Line on NGT's pipelines an Electrical Impact Assessment will be carried out in accordance with NGT methodology. The results of which will be presented to SGN and NGT in consultation. Information is provided in the Applicant Response to NGT. (See NGT1 in this table) Following the withdrawal of SGN's objection the Applicant will ensure that any further consultation will take place if necessary.
SW1	Scottish Water	Scottish Water has no objection to the proposal but highlights important considerations: No Drinking Water Protected Areas are affected. There is live Scottish Water infrastructure nearby, so the applicant must identify any potential conflicts and consult their Asset Impact Team via the Customer Portal before starting work; Written permission is required for any works near their assets; Surface	Water Environment	All applicable guidance from Scottish Water will be required. It is not anticipated that any of Scottish Water's impacts will be affected.

		water must not be connected to the combined sewer system except in very limited, justified brownfield cases; Developers should follow Scottish Water’s guidance and submit evidence supporting drainage plans during the technical application stage; and a Pre-Development Enquiry (PDE) form must be submitted via their Customer Portal before formal technical applications to enable full appraisal of proposals.		
TS1	Transport Scotland	Noted that Chapter 10 will use the transport and traffic assessment methodology based on IEMA guidelines detailed in Environmental Assessment of Traffic and Movement (July 2023) including a study area determined by public roads and provide regional and sub-regional and local access to the project. • Considered the approach appropriate and requires screening of trunk roads with the potential to be utilised for construction if IEMA thresholds are exceeded. • Asked that methodology statements are provided for any trunk roads crossing in relation to overhead lines. • Noted that traffic data would be collected and advice use of alternative source at Traffic Scotland’s National Traffic Data System. • Transport Scotland noted that Abnormal Indivisible Loads would be required during construction, with the port of origin yet to be confirmed.	Traffic and Transport	All points from Transport Scotland have been noted and the majority are to be considered within Chapter 11 Traffic and Movement of the EIAR. The crossing of trunk roads are discussed in Chapter 4 Project Description of the EIAR.

		- Acknowledged that a Preliminary Route Appraisal was being prepared, covering proposed routes, vehicle types, axle loads and swept paths for any constraints. - The size of loads proposed are required to be able to negotiate the selected route and not adversely affect structures within the trunk road route path.		
WT1	Woodlands Trust	The Woodland Trust provided a standard automated response providing contact information by enquiry type due to limited capacity and noted that it was difficult to respond to enquiries that relate to threats unrelated to ancient woods or ancient and veteran trees.	Forestry / Biodiversity	No action required.

Appendix C Scoping Opinion

Appendix B – Scoping Framework



Scottish Government
Riaghaltas na h-Alba
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**The Scottish Government
Energy Consents Unit**

**Scoping Opinion on behalf of Scottish Ministers under the
Electricity Works (Environmental Impact Assessment) (Scotland)
Regulations 2017**

**Denny to Wishaw Network Upgrade (DWNO)
Scottish Power Transmission Plc**

07 October 2025

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1. Introduction

1.1 This scoping opinion is issued by the Scottish Government Energy Consents Unit on behalf of the Scottish Ministers to Scottish Power Transmission Plc a company incorporated under the Companies Acts with company number SC189125 and having its registered office at 320 Vincent Street, Glasgow G2 5AD (“the Company”) in response to a request dated 13 July 2025 for a scoping opinion under the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 in relation to the proposed Denny to Wishaw Network Upgrade (DWNO) Electricity Transmission Infrastructure Development (“the proposed development”). The request was accompanied by a scoping report.

1.2 The proposed development would be located across parts of North Lanarkshire Council and Falkirk Council areas. Due to the linear nature of the overhead electric lines, there is no single town or village to which the development is adjacent. However, the nearest towns along the route including Bonnybridge, Cumbernauld, Glenmavis, Coatbridge, Airdrie, and Wishaw, as detailed in Figure 2.3 of the submitted Scoping Report.

1.3 The proposed development comprises the following key elements:

- A new 275 / 400kV overhead line (OHL) of approximately 19km between Bonnybridge Substation and Glenmavis, teeing into the existing XX 275kV OHL;
- Uprating of existing OHLs from 275kV to 275kV / 400kV, including conductor replacement, across the following routes:
 - ZG Route: Denny North to Bonnybridge (4km);
 - XX Route: Easterhouse to Newarthill (15.4km), including a diversion at Glenmavis and one additional tower at Newarthill Substation;
 - XR Route: Newarthill to Wishaw (16km), including one additional tower at Newarthill Substation;
- Installation of two new towers and two spans on the ZD route at Denny North Substation;
- Extension of existing substations at Bonnybridge, Denny North, Cumbernauld, Easterhouse, and Wishaw;
- Removal of the CB 132kV route between Cumbernauld and Bonnybridge substations;
- Undergrounding of sections of the existing AA 132kV OHL between:
 - Bonnybridge Substation and tower AA001;
 - Tower AA006 and tower AA009, including a temporary mast;
- Installation of one new Cable Sealing End (CSE) tower on the AA route.

1.4 In addition to the overhead line works, the proposed development includes ancillary infrastructure such as:

- Substation extensions;
- Additional towers and spans;
- Underground cable sections;
- Cable Sealing End (CSE) infrastructure.

1.5 The Company indicates the proposed development would be decommissioned after 80 years and the site restored in accordance with the decommissioning and restoration plan.

1.6 The proposed development is within the planning authority areas of North Lanarkshire Council and Falkirk Council.

2. Consultation

2.1 Following the scoping opinion request a list of consultees was agreed between Scottish Power Transmission Plc (acting as the Company's agent) and the Energy Consents Unit. A consultation on the scoping report was undertaken by the Scottish Ministers and this commenced on 16 July 2025. The consultation closed on 2 September 2025. Extensions to this deadline was granted to North Lanarkshire Council. The Scottish Ministers also requested responses from their internal advisors Transport Scotland and Scottish Forestry. Standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD) has been provided with requirements to complete a checklist prior to the submission of the application for consent under section 37 of the Electricity Act 1989. All consultation responses received, and the standing advice from MD-SEDD, are attached in **ANNEX A Consultation responses** and **ANNEX B MD-SEDD Standing Advice**.

2.2 The purpose of the consultation was to obtain scoping advice from each consultee on environmental matters within their remit. Responses from consultees and advisors, including the standing advice from MD-SEDD, should be read in full for detailed requirements and for comprehensive guidance, advice and, where appropriate, templates for preparation of the Environmental Impact Assessment (EIA) report.

2.3 Unless stated to the contrary in this scoping opinion, Scottish Ministers expect the EIA report to include all matters raised in responses from the consultees and advisors.

2.4 The following organisations were consulted but did not provide a response:

Civil Aviation Authority
Crown Estate Scotland
Fisheries - Local District Salmon Fisheries
Fisheries Management Scotland
Fisheries Trust Scotland
John Muir Trust
Mountaineering Scotland
National Grid
RSPB Scotland
Scottish Canals
Scottish Rights of Way and Access Society (ScotWays)
Scottish Wild Land Group (SWLG)
Scottish Wildlife Trust
The Coal Authority
Visit Scotland
West of Scotland Archaeology Services
Woodland Trust
Airth Parish Community Council
Armadale Community Council
Auchinloch Community Council
Banknock, Haggs and Longcroft Community Council
Blackness Community Council
Bo'ness Community Council

Brightons Community Council
Caldercruix Community Council
Carbrain & Hillcrest Community Council
Castlecary Community Council
Chryston Community Council
Cleland Community Council
Communities Along the Carron Association (CATCA)
Condorrat Community Council
Craigmarloch Community Council
Denny & District Community Council
Dullatur Community Council
Gartcosh Community Council
Garthamlock, Craigend & Gartloch Community Council
Glenmavis Community Council
Grangemouth and Skinflats Community Council
Greengairs Community Council
Kilsyth Community Council
Ladywell Community Council
Muirhouse and Flemington Community Council
Newmains & District Community Council
Overtown & Waterloo Community Council
Palcerigg Community Trust
Polmont Community Council
Reddingmuirhead and Wallacestone Community Council
Seafar & Ravenswood Community Council
Steps & District Community Council
Swinton Community Council
Thorniewood Community Council

2.5 With regard to those consultees who did not respond, it is assumed that they have no comment to make on the scoping report, however each would be consulted again in the event that an application for section 37 consent is submitted subsequent to this EIA scoping opinion.

2.6 The Scottish Ministers are satisfied that the requirements for consultation set out in Regulation 12(4) of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 have been met.

3. The Scoping Opinion

3.1 This scoping opinion has been adopted following consultation with North Lanarkshire Council and Falkirk Council, within whose area the proposed development would be situated, NatureScot (previously “SNH”), Scottish Environment Protection Agency and Historic Environment Scotland, all as statutory consultation bodies, and with other bodies which Scottish Ministers consider likely to have an interest in the proposed development by reason of their specific environmental responsibilities or local and regional competencies.

3.2 Scottish Ministers adopt this scoping opinion having taken into account the information provided by the applicant in its request dated 13 June 2025 in respect of the specific characteristics of the proposed development and responses received to the consultation undertaken. In providing this scoping opinion, the Scottish Ministers have had regard to current knowledge and methods of assessment; have taken into account the specific characteristics of the proposed development, the specific characteristics of that type of development and the environmental features likely to be affected.

3.3 A copy of this scoping opinion has been sent to North Lanarkshire Council and Falkirk Council for publication on their website. It has also been published on the Scottish Government energy consents website at www.energyconsents.scot.

3.4 Scottish Ministers expect the EIA report which will accompany the application for the proposed development to consider in full all consultation responses attached in **Annex A and Annex B**.

3.5 Scottish Ministers are satisfied with the scope of the EIA set out at Section 3 to 13 of the scoping report.

3.6 In addition to the consultation responses, Ministers wish to provide comments with regards to the scope of the EIA report. The Company should note and address each matter.

3.7 Scottish Water provided information on whether there are any drinking water protected areas or Scottish Water assets on which the development could have any significant effect. Scottish Ministers request that the company contacts Scottish Water (via EIA@scottishwater.co.uk) and makes further enquires to confirm whether there are any Scottish Water assets which may be affected by the development, and includes details in the EIA report of any relevant mitigation measures to be provided.

3.8 Scottish Ministers request that the Company investigates the presence of any private water supplies which may be impacted by the development. The EIA report should include details of any supplies identified by this investigation, and if any supplies are identified, the Company should provide an assessment of the potential impacts, risks, and any mitigation which would be provided.

3.9 Marine Directorate – Science Evidence Data and Digital (MD-SEDD) provide generic scoping guidelines for overhead line development <https://www2.gov.scot/Topics/marine/Salmon-Trout-Coarse/Freshwater/Research/onshoreren> which outline how fish populations can be

impacted during the construction, operation and decommissioning of a wind farm or overhead line development and informs developers as to what should be considered, in relation to freshwater and diadromous fish and fisheries, during the EIA process.

3.10 In addition to identifying the main watercourses and waterbodies within and downstream of the proposed development area, developers should identify and consider, at this early stage, any areas of Special Areas of Conservation where fish are a qualifying feature and proposed felling operations particularly in acid sensitive areas.

3.11 MD-SEDD also provide standing advice for overhead line development (which has been appended at Annex B) which outlines what information, relating to freshwater and diadromous fish and fisheries, is expected in the EIA report. Use of the checklist, provided in Annex 1 of the standing advice, should ensure that the EIA report contains the required information; the absence of such information may necessitate requesting additional information which may delay the process. Developers are required to submit the completed checklist in advance of their application submission.

3.12 Scottish Ministers consider that where there is a demonstrable requirement for peat landslide hazard and risk assessment (PLHRA), the assessment should be undertaken as part of the EIA process to provide Ministers with a clear understanding of whether the risks are acceptable and capable of being controlled by mitigation measures. The Peat Landslide Hazard and Risk Assessments: Best Practice Guide for Proposed Electricity Generation Developments (Second Edition), published at <http://www.gov.scot/Publications/2017/04/8868>, should be followed in the preparation of the EIA report, which should contain such an assessment and details of mitigation measures. Where a PLHRA is not required clear justification for not carrying out such a risk assessment is required.

3.13 The scoping report identified viewpoints at Figure 5.3 (Appendix A), Table 5-1 Representative Viewpoint to be assessed within the landscape and visual impact assessment. *See Guidance note on options for this section.*

3.14 The noise assessment should be carried out in line with relevant legislation and standards as detailed in Section 11 of the scoping report. The noise assessment report should be formatted as per Table 6.1 of the IOA "A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise."

3.15 NatureScot has confirmed that sufficient data has been collected for ornithological interests, specifically for the non-breeding Taiga Bean Goose within the Slamannan Plateau SPA. Given the limited additional bird interest in the area, no further bird surveys are proposed. It is recommended by the Scottish Ministers that decisions on bird surveys – species, methodology, vantage points, viewsheds & duration - site specific & cumulative – should be made following discussion between the Company and NatureScot.

3.16 The Scottish Ministers request that the company assess the impact of the proposed development on existing and/or planned infrastructure. In particular, the company should carry out the necessary assessments to confirm if any part of the proposed development is within the consultation zone of any of the following:-

- a licenced explosives site;
- gas (or any other) pipeline;
- existing overhead electric lines;
- underground cables;
- water pipes; and
- telecommunications links.

3.17 Scottish Ministers request the company to assess if any flammable, toxic or explosive chemicals detailed in The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015 would be stored on site in quantities such that a Hazardous Substances Consent would be required under section 2 of the Planning (Hazardous Substances) (Scotland) Act 1997.

3.18 Ministers are aware that further engagement is required between parties regarding the refinement of the design of the proposed development regarding, among other things, surveys, management plans, peat, radio links, finalisation of viewpoints, cultural heritage, cumulative assessments and request that they are kept informed of relevant discussions.

4. Mitigation Measures

4.1 The Scottish Ministers are required to make a reasoned conclusion on the significant effects of the proposed development on the environment as identified in the environmental impact assessment. The mitigation measures suggested for any significant environmental impacts identified should be presented as a conclusion to each chapter. Applicants are also asked to provide a consolidated schedule of all mitigation measures proposed in the environmental assessment, provided in tabular form, where that mitigation is relied upon in relation to reported conclusions of likelihood or significance of impacts.

5. Conclusion

5.1 This scoping opinion is based on information contained in the applicant's written request for a scoping opinion and information available at the date of this scoping opinion. The adoption of this scoping opinion by the Scottish Ministers does not preclude the Scottish Ministers from requiring of the applicant information in connection with an EIA report submitted in connection with any application for section 37 consent for the proposed development.

5.2 This scoping opinion will not prevent the Scottish Ministers from seeking additional information at application stage, for example to include cumulative impacts of additional developments which enter the planning process after the date of this opinion.

5.3 Without prejudice to that generality, it is recommended that advice regarding the requirement for an additional scoping opinion be sought from Scottish Ministers in the event that no application has been submitted within 12 months of the date of this opinion.

5.4 It is acknowledged that the environmental impact assessment process is iterative and should inform the final layout and design of proposed developments. Scottish Ministers note that further engagement between relevant parties in relation to the refinement of the design of this proposed development will be required, and would request that they are kept informed of on-going discussions in relation to this.

5.5 Applicants are encouraged to engage with officials at the Scottish Government's Energy Consents Unit at the pre-application stage and before proposals reach design freeze.

5.6 When finalising the EIA report, applicants are asked to provide a summary in tabular form of where within the EIA report each of the specific matters raised in this scoping opinion has been addressed.

5.7 It should be noted that to facilitate uploading to the Energy Consents portal, the EIA report and its associated documentation should be divided into appropriately named separate files of sizes no more than 10 megabytes (MB).

Paul Wilson

Paul Wilson
Energy Consents Unit
07 October 2025

ANNEX A

Consultation

List of consultees who provided a response.

- Falkirk Council
- North Lanarkshire Council
- Historic Environment Scotland
- Scottish Environmental Protection Agency
- NatureScot (previously “SNH)
- British Horse Society
- British Telecommunications plc
- Defence Infrastructure Organisation
- Health and Safety Executive
- Joint Radio Company Limited
- National Gas Transmission
- NATS Safeguarding
- Network Rail
- Nuclear Safety Directorate (HSE)
- Scottish Gas Network
- Scottish Water

Internal advice from areas of the Scottish Government was provided by officials from Transport Scotland, Scottish Forestry and Marine Directorate (in the form of standing advice from Marine Directorate – Science Evidence Data and Digital (MD-SEDD).

See Section 2.4 above for a list of organisations that were consulted but did not provide a response.

From: [Julie Seidel](#)
To: [Paul Wilson](#)
Subject: Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196
Date: 08 August 2025 14:58:58
Attachments: [image002.png](#)
[image003.png](#)

Paul,

Thank you for your consultation.

I have read the scoping report and broadly agree with the conclusions in relation to likely environmental effects. I have no further comment at this stage.

Kind regards,

Julie Seidel-Gregory, Planning Officer Place Services

01324 504880



[Customer and Stakeholder Survey | Improvement Service](#)

E-mail: smithle@northlan.gov.uk
 Contact: Lisa Smith
 Tel: 01236 632487
 Date: 24 September 2025



Mr P Wilson
 Scottish Government Energy Consents Unit
 Directorate for Energy and Climate Change
 5 Atlantic Quay
 150 Broomielaw
 Glasgow
 G2 8LU

Enterprise And Communities

Lorna Bowden
 Planning and Place Manager
 Ground Floor, Civic Centre
 Windmillhill Street
 Motherwell, ML1 1AB
www.northlanarkshire.gov.uk

Dear Mr Wilson,

25/00782/ECU - Consultation from Scottish Government on EIA Scoping Opinion - Proposed Section 37 application (with EIA) to the Energy Consent Unit for Works associated with the Scottish Power Energy Network Denny to Wishaw Network Upgrade (DWNO) project including construction of new overhead power lines with steel towers, removal of existing overhead power lines, uprating of existing overhead power lines and works to substations. (ECU ref ECU00006196) - Various Sites/substations In Vicinity Of Areas Between Bonnybridge to Glenmavis And Cumbernauld, Easterhouse to Newarthill and Newarthill to Wishaw

I refer to correspondence related to the above numbered application.

Firstly, please accept our sincere apologies for the delay in my response. The matters we wish to raise are as follows:

Planning Policy Compliance

The EIAR should demonstrate alignment with North Lanarkshire Local Development Plan (2022) (LDP) and relevant Supplementary Guidance, including LDP policies:

· PROM LOC4, PROT A/B, EDQ 1-3, and any relevant SPG's on biodiversity, flooding, and conservation matters.

Landscape and Visual Impact Assessment (LVIA)

The Scoping Report proposes to scope out the uprated overhead lines (XX and XR routes) and substation works at Easterhouse and Wishaw from the LVIA. However, we would note:

- Tree removal and access improvements may result in permanent or long-term changes to landscape character.
- Visual impacts may affect sensitive receptors in Glenmavis, Chapelhall, Newarthill, and surrounding communities.

The EIAR should also include a proportionate LVIA of the uprated overhead lines and substation works within North Lanarkshire, particularly where works may alter landscape character or affect visual amenity.



Cultural Heritage and Archaeology

The XX and XR routes pass near listed buildings, conservation areas, and scheduled monuments, including the Antonine Wall World Heritage Site Buffer Zone.

We would note that the EIAR should assess:

- Potential setting impacts from uprated lines and substation works.
- Physical impacts from construction access and ground disturbance.
- Appropriate mitigation and consultation with Historic Environment Scotland and NLC's planning officers.
- Detailed comments from the Council's Archaeologist dated 11 September 2025, sent in a separate document should be considered.

Whilst we have made some general comments which relate to Heritage Assets Building, World Heritage Sites and Scheduled Monuments we would expect Historic Environment Scotland to respond in more detail on these matters.

Ecology and Biodiversity

The proposed development intersects or lies adjacent to several designated and non-designated ecological sites, including:

- Slamannan Plateau SPA.
- Woodend Loch SSSI.
- Multiple SINC, LNRs, and ancient woodland areas.

We have included in Appendix 2 additional local designations not included within the Scoping Report which fall with the red line area provided for the development and these should be included in any assessment in terms of any possible detrimental impacts from the development proposed.

In relation to proposed substation extensions and associated works to nearby pylons, the Environmental Impact Assessment (EIA) should clearly articulate the justification for the proposals, including a robust explanation of why less harmful alternatives have not been pursued. This is particularly important in the context of the enhanced requirements of the Development Plan, which seeks to address both the climate emergency and the nature crisis. It is essential that the assessment reflects the need to balance infrastructure development with the protection and enhancement of natural assets.

Specifically, proposals at the Cumbernauld and Easterhouse substations must demonstrate a clear commitment to minimising adverse impacts on the surrounding natural environment. The design and siting of infrastructure should be informed by a thorough understanding of existing ecological and landscape sensitivities, with mitigation measures integrated wherever possible to reduce harm and support biodiversity.

Whilst we have made some general comments which relate to International and National Designations, we would expect Naturescot to respond in more detail on these matters.

The EIAR should also include:

- Updated Phase 1 and protected species surveys.
- Assessment of potential impacts on qualifying features of designated sites.
- Clear demonstration of Biodiversity Net Gain (BNG) within North Lanarkshire.
- Consideration of cumulative impacts with other infrastructure projects.

Water Environment and Flood Risk

The development crosses multiple watercourses and catchments within North Lanarkshire. The EIAR should include:

- Site-specific flood risk assessments
- Assessment of impacts on water quality, hydrology, and aquatic habitats
- Compliance with SEPA guidance and NLC's Supplementary Planning Guidance on flooding and drainage – we advised previously that the council's Water Management Team had no comments to add for the Scoping Report.

Whilst we have made some general comments relating to these matters we would expect SEPA to provide more detailed comments on their requirements.

Geology and Soils

No comment to make other than to support the approach suggested of mitigation via design, avoidance, and remediation to minimise disturbance.

Contamination – comments provided separately 11 September 2025 from the council's Environmental Health require to be followed including a need to liaise with SEPA for any works within the in the Gowkthrapple Area.

Traffic and Movement

The councils Infrastructure and Transportation Service had no comments to make.

Noise and Vibration

We previously provided comments dated 11 September 2025 from the council's Environmental Health Service about these matters should be considered within the EIA.

Socio-Economic and Recreation

The project traverses' areas with high deprivation (SIMD), recreational assets (e.g. Palacerigg Country Park), and proximity to COMAH sites (e.g. Inver House Distillers). (recent planning permissions are listed within Appendix 1)

We would suggest that the EIAR should consider matters such as:

- Assessment of socio-economic impacts, including community amenity and access.
- Consideration of health and safety risks near sensitive industrial sites.
- Engagement with local communities and recreational stakeholders.

The Gowkthrapple Substation and its associated infrastructure could reasonably be considered a longstanding visual and environmental detractor within the Gowkthrapple area. In this context, the EIAR should critically assess whether the current proposals represent the most appropriate solution for the surrounding community. Particular attention should be given to the potential for redesign or mitigation measures that would minimise adverse impacts, especially given the proximity of the substation to a strategically important masterplanned area for housing and regeneration. Any new development in this location must be carefully considered so as not to undermine the objectives of wider regeneration efforts.

As previously noted in this response, and relevant to this chapter of the scoping report, proposals at the Cumbernauld and Easterhouse substations should also demonstrate a clear commitment to minimising impacts on surrounding natural assets. These areas provide important environmental and recreational value, contributing positively to public health and wellbeing. The design and implementation of infrastructure in these locations should therefore be guided by principles of environmental sensitivity and community benefit.

Our records show that this proposal could impact on the following:

Palacerigg Country Park, Cumbernauld, Category A3 Local Sites, PROT A POLICY Natural Environment and Green Network Assets Country Park – NLLDP Map Book 5.5.
Drumpellier Country Park, Coatbridge, Category A3 Local Sites PROT A POLICY Natural Environment and Green Network Assets Country Park - NLLDP Map Book 8.3.

Greenhead Moss Community Park, Wishaw Category A3 Local Sites PROT A POLICY Natural Environment and Green Network Assets Community Park - NLLDP Map Book. 12.6 and 13.6.

Green/Urban Green Networks

Chapelhall - NLLDP Map Book 9.5

Cumbernauld, NLLDP Map Book 5.4/6.4

Glenmavis- NLLDP Map Book 7.4

Pather, Wishaw – NLLDP Map Book 13.5

Seven Lochs Wetland Park – adjacent to Easterhouse Substation - NLLDP Map Book 8.3.

It would be expected that any significant impacts on these areas would be considered.

Land Use Forestry and Agriculture

We would raise concerns regarding the assessment of the Cumbernauld Substation within the Environmental Impact Assessment. While the substation faces an urban area to the north, it is otherwise predominantly surrounded by woodland. This woodland forms part of a wider ecological network, bordering Palacerigg Country Park, Glencryan Woods—designated as a Site of Importance for Nature Conservation—and Forest Wood Nature Reserve, which is managed by the Scottish Wildlife Trust.

Given the proximity to these valued natural assets, the assessment should more clearly acknowledge the sensitivity of the surrounding environment and demonstrate how potential impacts have been minimised. The proposals must be considered in the context of their cumulative effect on biodiversity and landscape character, and should reflect the principles of the Development Plan in addressing the climate and nature crises.

Attached to this letter are two appendices. Appendix 1 covers committed applications which are in proximity to the red line for the proposed development. Appendix 2 is for local designations which from our records are not included within the scoping report but are with the red line for the proposed development site.

This response is provided solely for the purposes of North Lanarkshire Council's Scoping Opinion under the EIA (Scotland) Regulations 2017 and does not constitute a view on the planning merits of the proposal or any future application.

Yours sincerely,

Lisa Smith

ppLorna Bowden
Planning and Place Manager

Appendix 1

Committed Development - Applications approved or pending consideration within last 5 years

24/01227/MS - Land At Mid Forest Forest Road Abrohill Cumbernauld North Lanarkshire - 300 Dwellings (Application for Approval of Reserved Matters Specified in Conditions of Planning Permission (in Principle) 16/00698/PPP for Residential Development and Associated Infrastructure). Amendment of Consented Proposals for Residential Development. Partial internal re-design to the Southern Pod of the site and the Introduction of Amended House Types to the Whole Southern Pod. **EIA under 16/00698/PPP.**

22/01051/MS - Land To The South Of Forest Road Abrohill Cumbernauld North Lanarkshire - 300 dwellings (application for approval of reserved matters specified in conditions of planning permission (in principle) 16/00698/PPP for residential development and associated infrastructure). **EIA under 16/00698/PPP.**

24/00230/PPP Land At Palacerigg Road Cumbernauld North Lanarkshire - Residential led mixed use development with associated access, open space, landscaping, drainage features and associated infrastructure (in principle) **EIA**

24/01293/PAN - Cumbernauld Electricity Substation Forest Road Abrohill Cumbernauld North Lanarkshire, Extension To Electricity Substation Including Installation Of One 275kv Bus Section Circuit Breaker, Two 275/33kv 90mva Dual Wound Transformers, One Ais Disconnecting Circuit Breaker, Vehicular Access, Earthworks, Drainage Proposals, Erection Of Boundary Security Fence And Associated Works. **Part of proposed Denny to Wishaw Scottish Power works.**

25/00593/PAN Land To East Of Airdrie North Of The M8 (A723/Newhouse Interchange) To The A73 North Of Stand/Riggend North Lanarkshire -Proposal of Application Notice: Creation of a new single-carriageway road link with associated earthworks, drainage, lighting, landscaping, signage and environmental mitigations. **EIA required**

24/01024/EIASCO Land To East Of Airdrie North Of The M8 (A723/Newhouse Interchange) To The A73 North Of Stand/Riggend North Lanarkshire - Request for EIA Scoping Opinion - Creation of New Two-way Single-carriageway Road Link with Associated Earthworks, Drainage, Lighting, Landscaping, Signage & Environmental Mitigations.

22/00430/MS Site At Stirling Road Airdrie North Lanarkshire - Masterplan Phasing and Enabling Works Comprising Formation of Vehicular/Pedestrian Accesses and Initial Extents of Spine Roads, Remote Footpaths, Relocation and Alteration to Southbound Bus Stop, SUDS, Landscaping, Perimeter Boundary Treatments, and Associated Site Infrastructure/Platforming (Application for Approval of Matters Specified by Conditions of 18/01785/PPP for Residential-led Mixed-use Development)

25/00952/MS - Site At Stirling Road Airdrie North Lanarkshire - Application for Matters Specified in Conditions 1a (Design, layout), 1b and 1c (roads), 1d and 1j (landscaping), 1e (boundary walls, fences), 1f and 1g (drainage), 1h (site levels), 1k and 1l (dust mitigation, CEMP), 3 (noise), 4 (flood risk assessment), 6 (site investigation), 7 and 8 (remediation strategy) and 10, 11, 12, 14, 15 and 16 (ecology) of 18/01785/PPP for residential-led mixed use development at Site East of Stirling Road, Airdrie, North Lanarkshire. **PENDING CONSIDERATION.**

24/00732/PPP Land Surrounded By Darngavil Road Dykehead Road Airdriehill Road Ballochney Road (Plains) Airdrie North Lanarkshire - Mixed use development comprising residential, commercial uses

(including storage, business and industrial), retail, drive thru, leisure uses, hotel, primary school and nursery along with new roads, accesses, car parking, landscaping, and associated development (EIA development) **PENDING CONSIDERATION.**

25/00844/FUL Dalmacoulter Landfill Dalmacoulter Road Airdrie North Lanarkshire ML6 7UD - Installation and operation of a solar PV development including photovoltaic panels, mounting frames, transformer kiosk and onsite substation with associated ancillary development including security fencing, site access and internal access tracks, internal cabling, CCTV cameras, temporary construction compound, biodiversity and landscape enhancements, and associated site works. **Full EIA screening yet to be concluded. PENDING CONSIDERATION.**

24/01250/PPP Land At Rydenmains Road Glenmavis North Lanarkshire Residential led development comprising up to 120 residential units, associated accesses and roads, car parking, landscaping and associated development (in principle). **PENDING CONSIDERATION**

24/00209/MSC Land At Craignethan Drive Glenboig North Lanarkshire Approval of matters specified in conditions 1 a,b,c,e,f,g,h,i,j,k,m of planning permission in principle ref 14/01594/PPP for the erection of 155 dwellinghouses with associated roads, infrastructure and landscaping (amended proposals on part of the site previously approved under ref: 20/00035/MSC).

23/00760/FUL - Airdrie Hill Quarry Airdrie Hill Road Rawyards Airdrie North Lanarkshire Land engineering operations (including importation of material) to facilitate holiday park development including creation of access road and paths, construction of 134 holiday lodges, shared facilities and other associated infrastructure. **PENDING CONSIDERATION.**

23/00535/FUL - Land To The East Of 26 Airdrie Hill Street Rawyards Airdrie North Lanarkshire - Residential development of 62 dwellings, with associated roads, parking and landscaping.

23/00800/FUL Wester Moffat Farm (Land To The East Of Wester Moffat Hospital, Towers Road And South Of Forrest Street) Airdrie - Proposed (Use Class 8) Hospital (replacement University Hospital Monklands) and supporting hospital-related facilities, (Use Class 10) Nursery, and all associated accesses, parking, landscaping, infrastructure and associated miscellaneous development (with supporting EIA report).

23/00400/FUL - Inverhouse Distillers Ltd. Moffat Distillery Roughrigg Road Airdrie ML6 8PL - Bonded Warehouse Maturation Sheds and Associated Works.

23/00589/FUL - Inverhouse Distillers Ltd. Moffat Distillery Roughrigg Road Airdrie North Lanarkshire ML6 8PL - Bonded warehouses, including groundworks and site landscaping.

24/00872/S42 - Land South Of Junction Of Lancaster Avenue And Bellside Road Chapelhall North Lanarkshire -Section 42 application to vary conditions 1 to 18 (excluding condition 7) of permission 21/01434/S42 (Mixed Use Development Comprising Class 3 (Food & Drink), Class 7 (Hotel), Class 11 (Assembly/Leisure), Class 1A (Ancillary Retail) and Sui Generis (Roadside Fuel/Electric Charging, Hot Food Takeaway, Public Bar) with Associated Infrastructure (Drainage, Ground Treatment Landscaping)) **This is associated with 18/00266/PPP**

24/00810/FUL Land East Of Biggar Road Cleland North Lanarkshire - Construction of battery energy storage system (BESS).

25/00989/PAN – Land At North Lanrigg Carlisle Road Cleland North Lanarkshire ML1 5LT - Data centre complex including data halls, substation, new road accesses, balancing ponds, security, associated development, landscaping, habitat and biodiversity areas (major application).

23/00835/FUL - Land To The Rear Of 501 High Street Newarthill Motherwell North Lanarkshire - Residential development and associated infrastructure.

24/00208/PPP - Land At Coltness Avenue Allanton North Lanarkshire - Residential development and associated infrastructure (application for planning permission in principle).

24/01294/PAN - Electricity Sub Station Castlehill Road Gowkthrapple Wishaw North Lanarkshire Extension To Electricity Substation Including Installation Of Three Bays Of 400kv Double Busbar Gas Insulated Switchgear, One 400kv Bus Section Circuit Breaker, Vehicular Access And Bellmouth, Earthworks, Drainage Proposals, Erection Of Boundary Security Fence And Associated Works. **Part of proposed Denny to Wishaw Scottish Power works.**

21/00982/PPP - Site At 150 Birkshaw Brae Gowkthrapple Wishaw North Lanarkshire ML2 0LF - Residential development, ancillary retail, open space, landscaping, SUDS, access, associated works and demolition (in principle). **Large development directly adjacent to Gowkthrapple Substation.**

21/01316/MSC - Land At Castlehill Road Gowkthrapple Wishaw North Lanarkshire - Construction of 96 Dwellinghouses (Semi-Detached, Terraced, Bungalows and Cottage Flats), Day Care Unit, New Infrastructure including Roads and SUDS Drainage Systems (MSC application in relation to 21/00982/PPP). **Part Development concluded under 21/00982/PPP with further land directly opposite Gowkthrapple Substation part of master planned regeneration.**

22/00295/MSC - Wemysshill Farm Castlehill Road Overtown North Lanarkshire ML2 0RU - Construction of 200 Houses and ancillary infrastructure: MSC application for development at Castlehill in respect of conditions 1, 3, 4, 5, 6, 7, 8, 9, 10, 18, 21 and 22 of permission ref: 20/01468/S42 (Residential Development & Associated Uses, including Community Uses and Retail).

22/00296/MSC - Wemysshill Farm Castlehill Road Overtown North Lanarkshire ML2 0RU - Construction of 401 Houses and ancillary infrastructure: MSC application for development at Wemysshill North in respect of conditions 1, 3, 4, 5, 6, 7, 8, 9, 10, 18, 21 and 22 of permission ref: 20/01468/S42 (Residential Development & Associated Uses, including Community Uses and Retail).

20/01468/S42 - Wemysshill Farm Castlehill Road Overtown North Lanarkshire ML2 0RU - 15/01634/PPP - Residential Development & Associated Uses, including Community Uses and Retail (In Principle) (Section 42 application to amend condition 12 to allow the submission of the site investigation report to be provided in phases).

25/00830/FUL - Riggend Filling Station, Stirling Road, Airdrie, ML6 7SS - Formation of oil distribution depot including access roads, overnight HGV vehicle parking, driver parking and welfare unit and installation of 2 oil storage tanks. **PENDING CONSIDERATION.**

Appendix 2

Site of Importance of Nature Conservation missing for EIA Scoping Report but should be considered within it.

77/60B CUMBERNAULD GLEN: VAULT GLEN (EAST) - Woodland, Geological interest

77/48A DOUGLAS GLEN Woodland -felled

87/07 GARBETHILL MOOR Peatland

76/69 CAMERON GLEN (east) Woodland, wetland

76/42B SHANK BURN EAST: BRAKENHIRST PLANTATION Woodland

85/06 GREENHEAD MOSS Wetland, peatland, shelterbelt, woodland, meadows - mixed habitats

77/65B PALACERIGG COUNTRY PARK (East)

25/00782/ECU North Lanarkshire Council Consultee Responses as of 4.9.2025

Consultation from Scottish Government on EIA Scoping Opinion - Proposed Section 37 application (with EIA) to the Energy Consent Unit for Works associated with the Scottish Power Energy Network Denny to Wishaw Network Upgrade (DWNO) project including construction of new overhead power lines with steel towers, removal of existing overhead power lines, uprating of existing overhead power lines and works to substations. (ECU ref ECU00006196)

Environmental Health

Environmental Health have reviewed the relevant content (in particular Chapters 9 and 11) of the 'Denny to Wishaw Upgrade Scoping Report' AECOM for Scottish Power Networks (June, 2025) as submitted with the application.

Proposed investigations with respect to potential ground contamination - Chapter 9.6 summarises the proposed scope of works in relation to the various aspects of the development and Environmental Health are in general agreement with the approach detailed.

A site near to the Gowkthrapple Substation, Wishaw is associated with the historical use of the former 'Smiths Clockworks' factory site and luminous paint dating back to the second world war era. This would also relate to the land in relation to the connection of the existing overhead power cables (to be uprated) at the southernmost end of the 'XR' route where this connects to the Gowkthrapple Substation.

As such we would advise that the applicant should consult with SEPA at radioactivesubstance@sepa.org.uk. This is in line with a current directive from SEPA and SEPA processes with the applicant required to follow any general safety advice required by SEPA in relation to this subject.

Noise Impact (Chapter 11) -

We note within the report that any planned extensions/changes to existing substations would be subject to specific local Planning applications.

Paragraph 11.3 (Potentially Significant Effects) makes comments on the subject of potential noise impact from substation and sources associated with these. We understand that any associated noise impact assessment would be required where necessary in relation to any relevant local Planning applications linked to the works proposed.

However, paragraph 11.3 also describes two other noise sources of relevance to the proposed development, those being noise from overhead lines, and construction site noise impacts.

Paragraph 11.4 (Mitigation) provides a discussion of noise mitigation measures with respect to overhead line noise, substation noise, and construction site noise and for the latter these are summarised within this paragraph.

North Lanarkshire Council has long-standing published guidelines on noise from construction site activities which require noise from such activities to be restricted to the following days and times:

08:00 hours to 19:00 hours Monday – Friday,

08:00 hours to 13:00 hours Saturdays,

with no noise producing works undertaken on Sundays and Public Holidays which all development sites are expected to adhere to.

Paragraph 11.6 (Proposed Scope of Assessment Methodology) advises:

The Construction Noise Impact Assessment (CNIA) would be carried out according to the ABC method specified in Table E.1 of BS 5228-1, in which noise sensitive receptors (NSRs) are classified in categories A, B or C according to their measured or estimated background noise level.

In line with best practice (BS 5228-1), a CNMP will be developed by the Principal Contractor prior to starting construction works. The details of the CNMP will be agreed with North Lanarkshire Council and Falkirk Council and is expected to be secured by an appropriately worded condition of consent.

and we welcome such consultation at an appropriate stage.

We note and would promote the industry best practice of providing advance notice to residential neighbours likely to be impacted by the works at the appropriate time.

We note the summary in Chapter 11.7 (Summary) and have no further comments to add at this time.

Archaeology

The applicant has supplied a thorough and comprehensive Environmental Scoping Report (SCR), which is professional and competent. However, it lacks details on the nature of the proposed mitigation although it acknowledges the need for it. I have also commented on the scheme on behalf of Falkirk Council and given that the impact is the same across the two Council areas my advice is repeated here.

Scoping Opinion

Section 6.6 of the ESR confirms the which of the potential setting and physical impacts are scoped in or out. It is clear that there are no permanent setting impacts which have all been scoped out. This leaves physical impacts on World Heritage Sites, Scheduled Monuments, Designated Battlefield and both known and unknown undesignated archaeological remains.

Our recommendation would be the following:

- 1) A desk based assessment combined with a map regression using Roy's map;
- 2) A walkover survey to confirm the nature of the identified assets and any new ones;
- 3) Demonstration of Scheduled Monument Consent for any physical impacts on Scheduled Monuments;
- 4) Fencing of Scheduled Monuments in the immediate environs of development to prevent inadvertent damage;
- 5) A 7% ground breaking evaluation of any areas not subsequently disturbed by later activity outside Scheduled Monuments and Antonine Wall Buffer zones with scanning of spoil heaps to recover lithics;
- 6) Targeted metal detection survey;
- 7) Within the Antonine Wall Buffer Zone 100% strip and map with proposals for resultant excavation and processing;
- 8) Should any of the above stages identify significant archaeological remains these should be subject to further works such as excavation, post-excavation analyses, publication and archiving.

All of the above should be detailed in a programme of works to be agreed by North Lanarkshire Council.

NLC Water Management - agree with the scoping proposed by the applicant on the condition that all recommendations of the scoping report are complied with.

By email to: econsents_admin@gov.scot

Energy Consents Unit
4th Floor, 5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Longmore House
Salisbury Place
Edinburgh
EH9 1SH

Enquiry Line: 0131 668 8716
HMConsultations@hes.scot

Our case ID: 300037458
Your ref: ECU00006196
21 July 2025

Dear Scottish Government Energy Consents

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, Denny to Wishaw Network Upgrade - EIA Scoping

Thank you for consulting us on this Environmental Impact Assessment (EIA) scoping report, which we received on 16 July 2025. We have reviewed the details in terms of our historic environment interests. This covers World Heritage Sites, scheduled monuments and their settings, category A-listed buildings and their settings, inventory gardens and designed landscapes, inventory battlefields and Historic Marine Protected Areas.

The Falkirk Council and North Lanarkshire Council archaeological and cultural heritage advisors will also be able to offer advice on the scope of the cultural heritage assessment. This may include topics covered by [our advice-giving role](#), and also other topics such as unscheduled archaeology, category B and C listed buildings, and conservation areas.

Proposed development

We understand that the proposed development comprises the following elements:

- New Overhead Line between Bonnybridge and Glen Mavis
- Removal of CB Route OHL
- Undergrounding of AA Route OHL
- Upgrading of Existing ZG, XX and XR Overhead Line (OHL) Routes
- Upgrading of Denny North Substation
- Upgrading of Bonnybridge Substation
- Upgrading of Cumbernauld Substation
- Upgrading of Easterhouse Substation
- Upgrading of Wishaw Substation

No details have been provided on the proposed towers for upgrade, access tracks and compounds, there is the potential for significant adverse impacts on heritage assets within our statutory remit.

Background

We have previously provided the applicant extensive comments during consultations between 2019 and 2025 on multiple elements of the proposed development. The applicant should refer back to our full responses for detailed advice. A summary of our comments at each stage have been included below.

Corridor Selection Stage (2 July 2019)

We provided comments on the proposed development at corridor selection stage. Due to the lack of information provided, we provided high level comments on the proposals and identified a number of assets which had the potential for adverse impacts. We noted that any proposals to cross *the Frontiers of the Roman Empire (Antonine Wall) World Heritage Site (WHS)* and its buffer zone whether above or below ground would receive a high degree of scrutiny, including at international level. On this basis, we stated that all options would require careful consideration and be supported by a high level of assessment and evidence. We recommended that alternative options should be explored in a robust way to ensure that decision-making on the preferred route is clear and informed by appropriate information.

Background to Need Case (19 July 2021)

We provided comments on the proposed development at the 'Background for Need Case'. At this stage, additional information was supplied including an indicative tower plan and an online photographic tour which provided visualisations of the proposals. Our comments focused on the proposed new 400kV OHL between Bonnybridge and Glenmavis. We highlighted a number of internationally and nationally important assets in the vicinity of the proposed development:

- Frontiers of the Roman Empire (Antonine Wall)
[UNESCO World Heritage Site](#)
- Antonine Wall, Rough Castle to Lime Road, and field system
[Scheduled Monument \(SM8244\)](#) & [UNESCO World Heritage Site](#)
- Forth & Clyde Canal: Castlecary – M9 Motorway
[Scheduled Monument \(SM6768\)](#)
- Wester Carmuir, ring ditch settlement 450m SSW of
[Scheduled Monument \(SM6413\)](#)

We stated that it was important to ensure that further assessment of the likely impacts of the proposed development was undertaken as the design progressed. We also noted that we welcomed the opportunity for further engagement as the assessment of the likely impacts of the preferred route progressed.

Pre-application Meeting (5 September 2024)

We attended a project meeting to provide us with an update of the proposals. In the meeting, we reiterated our advice regarding potential impacts on the WHS. We highlighted that a key factor in decision-making was the impact of development on the Outstanding

Universal Value (OUV) of the WHS. We recommended that the principles of ICOMOS's guidance on Heritage Impact Assessment were to be taken into account in assessing such impacts. We also highlighted the presence of a number of scheduled monuments in the vicinity of the proposals. We noted any physical impacts to nationally important assets would require separate Scheduled Monument Consent – including any advanced investigation works, tree felling and any Horizontal Directional Drilling (HDD) that may be proposed for any undergrounding of cables below the Forth & Clyde Canal.

Public Consultation (24 February 2025)

We responded to the public consultation at routing and consultation stage. In our response, we noted that the applicants '*preferred alignment*' appeared to have changed since our previous consultation comments with changes to the OHL alignment north of [Wester Carmuir, ring ditch settlement 450m SSW of \(SM6413\)](#).

We also highlighted that the scope of the consultation had increased, with the addition of a further elements of work, including the upgrading of existing OHL routes, and the upgrades of a number of substations. These additional works introduced the potential for significant adverse impacts on a number of additional assets including:

- Wester Carmuir, enclosures 50m E of [Scheduled Monument \(SM6414\)](#)
- Wester Carmuir, ring ditch 500m NW of Carmuir [Scheduled Monument \(SM6415\)](#)
- Wester Carmuir, Roman camp 640m SE of [Scheduled Monument \(SM3188\)](#)
- Lochlands Roman Camps [Scheduled Monument \(SM4259\)](#)
- Antonine Wall, Rough Castle fort, annexe and Military Way [Scheduled Monument \(SM90013\)](#) & [UNESCO World Heritage Site](#)
- Station House, Roman temporary camp 200m SE of [Scheduled Monument \(SM6542\)](#) & [UNESCO World Heritage Site](#)

Based on the information, we were unable to provide detailed comments due to the lack of information provided within the consultation. We recommend that the applicant undertake, identify and include the outcomes of an initial cultural heritage assessment to identify any potential impacts.

Pre-application Meeting (19 June 2025)

We responded to a pre-application consultation requesting us to confirm a list of assets and visualisations that we would request to be included within the EIA report. In our response, we requested that in the first instance, the applicant should undertake a high level assessment of the setting of heritage assets likely to experience impacts from the proposed development.

We noted that we would expect all nationally designated assets within the Zone of Theoretical Visibility (ZTV) to undergo an initial assessment to determine the potential for effects to their setting. In the absence of any initial assessment, we were unable to provide any comments on the proposed scope of assets for inclusion within the EIA report, and subsequently to determine appropriate visualisations to support the assessment.

Pre-application Consultation (20 June 2025)

We responded to a consultation request to discuss a number of elements of the proposed development which had been introduced to the scheme and identified in our previous consultation. These additional proposals included the undergrounding of the AA OHL Route, Dismantling of the CB OHL Route and proposed access and construction elements of the WB OHL Route.

In our response, we identified that there was the potential for physical impacts from these additional elements on a number of assets in our remit:

- Forth & Clyde Canal: Castlecary – M9 Motorway
[Scheduled Monument \(SM6768\)](#)
- Frontiers of the Roman Empire (Antonine Wall)
[UNESCO World Heritage Site](#)
- Wester Carmuir, Roman camp 640m SE of
[Scheduled Monument \(SM3188\)](#)
- Wester Carmuir, ring ditch settlement 450m SSW of
[Scheduled Monument \(SM6413\)](#)
- Antonine Wall, Rough Castle fort, annex and military way
[Scheduled Monument \(SM90013\)](#) & [UNESCO World Heritage Site](#)
- Antonine Wall, 495m WSW and 125m SE of Bonnyside House
[Scheduled Monument \(SM8207\)](#) & [UNESCO World Heritage Site](#)
- Antonine Wall, Rough Castle To Lime Road, And Field System
[Scheduled Monument \(SM8244\)](#) & [UNESCO World Heritage Site](#)

We provided detailed advice on the nature of impacts, the requirements for any Scheduled Monument Consent (SMC) and recommended that the applicant engage with this process in parallel with the EIA process.

We noted that separate consultation would be required for any initial cultural heritage assessment that had been undertaken associated with the routing and alignment of the WB OHL route and any potential undergrounding of separate 33kV OHL routes.

Pre-application Site Meeting (10 July 2025)

We attended a site visit alongside the applicant, their consultants and contractors to discuss a number of elements of advanced works. The discussions visited a number of monuments, including *Wester Carmuir, ring ditch settlement 450m SSW of (SM6413)* and areas of the

Antonine Wall. Advice was provided on the likely requirements for SMC and discussion focused on options for mitigating impacts on a number of scheduled monuments.

Scoping Report

We welcome that potential impacts on cultural heritage & archaeology are scoped into the EIA report and that pre-application engagement has been undertaken to date. We have a number of comments to make on the methodology presented within the cultural heritage and archaeology chapter. We would welcome clarification of the points below in future correspondence.

Methodology

We are generally content with the scope as set out and the pre-application consultation to date. We welcome reference to our [Managing Change in the Historic Environment: Setting](#) guidance and expect to see a structured approach presented within the EIA for the assessment of any impacts which may arise from the proposed development detailing construction, operational and cumulative effects on our interests.

We note that a number of guidance documents have been referenced within *section 6.2*, however this list does not include the HES/NatureScot [EIA Handbook](#). Please note that in Scotland, we treat the advice in the EIA handbook as best practice for EIA and would refer the applicant to use it. In addition, also note that the terminology to be applied in Scotland should refer to [Inventory Gardens & Designed Landscapes](#) and not ‘*Registered Parks and Gardens*’.

The terminology applied throughout the scoping report is unclear. For example we note references to ‘*heritage value*’ (*Table 6-2*). This terminology replaces an existing and recognised term ‘Cultural Significance’. Our [National Planning Framework 4 \(NPF4\)](#) provides a clear and detailed definition of ‘Cultural Significance’ which we would expect to be used. This has been provided below for ease of reference.

“Cultural significance means aesthetic, historic, scientific or social value for past, present or future generations. Cultural significance can be embodied in a place itself, its fabric, setting, use, associations, meanings, records, related places and related objects.”

This terminology also translates and maps to the methodology presented in the HES/NatureScot EIA Handbook, for example *Appendix 1 Figure 1 – Example of Scale of Magnitude of Changes to the Historic Environment*.

We welcome that the applicant will undertake an assessment on the potential impacts on the *Frontiers of the Roman Empire (Antonine Wall) World Heritage Site (WHS)* following the ICOMOS [Guidance and Toolkit for Impact Assessments in a World Heritage Context](#).

Please note that the setting of a WHS can extend more widely than the limits of any formal buffer zone and will make an important contribution to a site’s Outstanding Universal Value (OUV). Any impacts on, or changes to, a World Heritage Site should be assessed in terms

of its OUV, which are the reasons it has been designated as an internationally important asset. We request that any Heritage Impact Assessment of the WHS and its OUV, should be included as a separate appendix to the cultural heritage & archaeology chapter and cross referenced with the EIA report.

Physical Impacts

In the first instance, the project should aim to avoid physical impacts on any nationally important historic environment assets if possible. Scheduled monuments are legally protected sites under the Ancient Monuments and Archaeological Areas Act 1979. Therefore, all works associated with the proposal (including advanced site investigations) must avoid direct impacts on these sites and contractors involved in the works should be made aware of this.

Should any works be required to existing infrastructure which are located within the curtilage of a scheduled monument, [Scheduled Monument Consent](#) from us will be required. Should this be the case, you should engage in pre-application discussions so that we can discuss and agree an appropriate methodology.

Setting Impacts

Careful consideration should be given to reducing and avoiding impacts on the setting of assets during the design process. It is not clear why a number of arbitrary study areas have been chosen and presented within *section 6.5*.

Rather than using specific study areas, we recommend that assets at risk of impact should be identified using a 'bare earth' Zone of Theoretical Visibility (ZTV). The EIA chapter should provide an evidential base for the sieving of assets from any subsequent detailed assessment. This sieving exercise should give consideration for assets with long distance views which form part of their cultural significance and should be informed by a robust assessment and appropriate visualisations.

We strongly recommend that the applicant refers to our [Managing Change in the Historic Environment: Setting](#) guidance to inform any setting assessments. We would expect a commitment to undertake on site assessment of the settings of designated assets and that any subsequent assessment of setting impacts should follow a clear and systematic framework for evaluating these impacts prior to scoping them in or out of detailed assessment. Please note that views towards an asset can also be an important part of its setting and this may necessitate consideration of additional assets outwith the ZTV.

Visualisations

We advise that visualisations should be provided for any asset where a significant effect is identified. At this stage we therefore suggest that visualisations are likely to be required for those assets where the potential for moderate or major effects is identified. Where initial assessment identifies potential impacts on an asset, we recommend that wireframe

visualisations should be produced to help analyse the impacts. If impacts are identified as significant, photomontages should be prepared.

If wireframes can be provided at an early stage this would assist both with the identification of significant effects and the scoping out of any monuments where significant effects are not likely, as well as identifying if potential mitigation by design is possible. It would also assist with identifying whether wireframes will be sufficient for the detailed assessment of impacts or whether photomontages would be required. We would be happy to discuss this in more detail as the EIA proceeds.

Our Advice

In its current form the proposed development has the potential for significant adverse impacts on a number of assets in our remit. In the absence of any initial assessment, we are unable to provide any comments on the proposed scope of assets for inclusion within the EIA report, and subsequently to determine appropriate visualisations to support the assessment.

We welcome the ongoing consultation with HES, and welcome that the applicant has engaged with the process of pre-application consultation for Scheduled Monument Consent as part of the advanced works.

Paul Wilson
Energy Consent Unit

Our Ref: PCS-20006234
Your Ref: ECU00006196

By email only to: Econsents_Admin@gov.scot

SEPA Email Contact:
planning.south@sepa.org.uk

04 August 2025

Dear Paul Wilson

**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 consulting SEPA for an Environmental Impact Assessment (EIA) scoping opinion in relation to the above development. We welcome engagement with the applicant at an early stage to discuss any of the issues raised in this letter and would especially welcome further pre-application engagement once initial peat probing, peat condition assessment and habitat survey work has been completed and the layout developed further as a result.

Our position and advice, given below, is based on the Scottish Ministers ultimately determining that the proposal is classed as development that could be supported for the purposes of assessment under Policies 5 Soils and 22 Flood risk and water management, as defined in National Planning Framework 4 (NPF4). If this is not the case, please advise

so we can re-consider our position and advice. We consider that this also covers the requirements in NPF4 Policies 2 Climate mitigation and adaption, 3 Biodiversity and 11 Energy.

Advice for the determining authority

To **avoid delay and potential objection** the EIA submission must contain a series of scale drawings of sensitivities, for example peat depth, peat condition, Groundwater Dependent Terrestrial Ecosystems (GWDTE), proximity to waterbodies, overlain with proposed permanent and temporary development. This is necessary to ensure the EIA process has informed the layout of the development to firstly avoid, then reduce and then mitigate significant impacts on the environment. We request that the issues covered in [Appendix 1](#) below, which provides details of our standard information requirements for EIA development and the form in which they must be submitted, and [Appendix 2](#), which provides additional development type specific advice, be addressed to our satisfaction in the EIA process.

We have also provided site specific comments in the following section which provides pre-application advice and can help the developer focus the scope of the assessment.

1. Site specific comments

Radioactive substances

- 1.1 We have reviewed the documents on the Energy Consents Unit portal concerning the above proposal and notes the Scoping Report 'Denny to Wishaw Network Upgrade', June 2025, prepared for SP Energy Networks by AECOM Limited. We note from Section 9.5 of the scoping report that desk studies will be carried out for the cable route, which involves new and replacement overhead cables as well as underground sections, and five substations on the route. Baseline conditions have been assessed by the applicant using historical maps, and conventional chemical contamination hazards have been noted in Section 9.3 'Land Contamination'. We have viewed Figures 1.1 and 2.3 of the scoping report to check if the cable route impinges on any

locations for which information on potential radioactive contamination is held by SEPA.

- 1.2 Approaches have already been made by the applicant and their environmental consultants to the Radioactive Substances Unit (SEPA RS Unit) at the pre-planning stage, in order to obtain advice about the potential for radioactive contamination at Wishaw substation on the route, as a precautionary matter, since it is located on land in proximity to a former clock factory that used radium-226 in the past. The applicant is advised to refer to the consultation responses previously provided by SEPA RS Unit, and to contact SEPA and the relevant local authority planning service for further advice if the route should change from that previously discussed.
- 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 Geoenvironmental 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.

Other

- 1.5 We understand that the next stage would consider the impact on peat, groundwater dependent terrestrial ecosystems, private water supplies and proximity to

waterbodies. We refer to the comments in Appendix 1 and 2 of this response for further advice about these and other aspects relevant to the proposal.

If you have queries relating to this letter, please contact us at planning.south@sepa.org.uk including our reference number in the email subject.

Your sincerely,

Silvia Cagnoni
Senior Planning Officer
Planning Service

Ecopsy to: Paul.wilson2@gov.scot

Disclaimer: This advice is given without prejudice to any decision made on elements of the proposal regulated by us, as such a decision may take into account factors not considered at this time. We prefer all the technical information required for any SEPA consents to be submitted at the same time as the planning or similar application. However, we consider it to be at the applicant's commercial risk if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising. We have relied on the accuracy and completeness of the information supplied to us in providing the above advice and can take no responsibility for incorrect data or interpretation, or omissions, in such information. If we have not referred to a particular issue in our response, it should not be assumed that there is no impact associated with that issue. For planning applications, if you did not specifically request advice on flood risk, then advice will not have been provided on this issue. Further information on our consultation arrangements generally can be found at sepa.org.uk/environment/land/planning/.

Appendix 1: SEPA Energy generation and transmission EIA scoping requirements

Please note that some of our planning guidance referenced in this response has been reviewed and updated to reflect the [National Planning Framework 4](#) (NPF4) policies. For example, our [Flood Risk Standing Advice](#), [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#).

This appendix sets out our minimum information requirements and we would welcome discussion around these prior to formal submission to avoid delays. There may be opportunities to scope out some of the issues below and in [Appendix 2](#) depending on the site. Evidence must be provided in the submission to support why an issue is not relevant for this site. If there is a significant length of time between scoping and application submission, the developer should check whether our advice has changed.

1. Site layout

- 1.1 Each of the drawings requested below must detail all proposed upgraded, temporary and permanent infrastructure. This includes all tracks, excavations, landraising and other groundworks, buildings, borrow pits, pipelines, cabling, site compounds, laydown areas, storage areas and any other construction and built elements. All drawings must be based on an adequate scale with which to assess the information.
- 1.2 The layout should be designed to minimise the extent of new works on previously undisturbed ground. For example, a layout which makes use of lots of spurs or loops is unlikely to be acceptable, cabling must be laid in ground already disturbed such as verges, and existing built infrastructure must be re-used or upgraded where possible.
- 1.3 A comparison of the environmental effects of alternative locations of infrastructure elements may be required. We seek absolute avoidance of development on the sensitive habitats detailed below. Where elements of a development haven't avoided for example near-natural peatland, adequate justification should be

provided for the proposed layout. The justification should include how any impacts are considered in relation to example the mitigation hierarchy as demonstrated through the Peat Management Plan (PMP) submission. This should be supported by maps with overlays of the peat maps and any other constraints, such as visual impact, to clearly demonstrate how these constraints have influenced any necessary need for development on peatland and other sensitive habitats within our remit.

2. Peatland and other carbon rich soils (CRS)

- 2.1 Peatland in near natural condition generally experiences low greenhouse gas emissions, is accumulating and may be sequestering carbon, has high value for supporting biodiversity, helps to protect water quality and contributes to natural flood management, irrespective of whether that peatland is designated for nature conservation purposes or not. Where proposals are on peatland or other CRS, the following should be submitted to address our requirements in relation to NPF4 Policy 5 to protect CRS and the ecosystem services they provide (including water and carbon storage).
- 2.2 It should be clearly demonstrated that the assessment has informed careful project design and ensured, in accordance with relevant guidance and the mitigation hierarchy in NPF4, that adverse impacts are first avoided and then minimised through best practice.
- 2.3 The submission should include a series of layout drawings, at a usable scale, showing all permanent and temporary infrastructure, along with the ancillary construction work areas, with the extent of excavation required. These plans should be overlaid on the following:
 - a) Peat depth survey showing peat probe locations, colour coded using distinct colours for each depth category. This must include adequate peat probing information to inform the site layout in accordance with the mitigation hierarchy

in NPF4, which may be more than that outlined in the [Peatland Survey – Guidance on Developments on Peatland \(2017\)](#).

- b) Peat depth survey showing interpolated peat depths.
- c) Peatland condition mapping – the [Peatland Condition Assessment](#) photographic guide lists the criteria for each condition category and illustrates how to identify each condition category.

2.4 The detailed series of layout drawings above should clearly demonstrate that peat excavation has been avoided where possible. Where complete avoidance of peat and other CRS is not possible, justification should be provided to adequately demonstrate why this is the case, and it should be clearly demonstrated on the drawings that:

- a) Development proposals avoid any near natural peatland and the deepest areas of peat.
- b) All proposed excavation is on peat less than 1m deep, where feasible.
- c) The volumes of peat excavated have been reduced as much as possible, first through layout and then by design, making use of techniques such as floating tracks.

2.5 The Outline Peat Management Plan (PMP) must include:

- a) A table setting out the volumes of acrotelmic, catotelmic and amorphous peat to be excavated. These should include a contingency factor to consider variables such as bulking and uncertainties in the estimation of peat volumes.
- b) A table clearly setting out the volumes of acrotelmic, catotelmic and amorphous excavated peat: (1) used in making good site specific areas disturbed by development, including borrow pits (quantities used in making good areas

disturbed by development must be the minimum required to achieve the intended environmental benefit and materials must be suitable for the proposed use), (2) used in on and off site peatland restoration, and (3) disposed of, and the proposed means of disposal (if deemed unavoidable after all other uses of excavated peat have been explored and reviewed).

- c) Details of proposals for temporary storage and handling of peat – [Good Practice during Wind Farm Construction](#) outlines the approach to good practice when addressing issues of peat management on site and minimising carbon loss.
- d) Suitable evidence that the use of peat in making good areas disturbed by development, including borrow pits, is genuine and not a waste disposal operation, including evidence on the suitability of the peat and evidence that the quantity used matches and does not exceed the requirement of the proposed use.
- e) If peat is to be used in the reinstatement of borrow pits on site, cross sections and plans should be provided showing the proposed maximum peat depth profiles for each category of peat, phasing and final restoration profiles in relation to surrounding land with a clear hydrological justification for the use of catotelmic peat also being given. The target restoration habitat for each borrow pit should be specified, along with how this will be maintained and managed in perpetuity.
- f) Use of excavated peat in areas not disturbed by the development itself is no longer a matter we provide planning advice on. Please refer to [Advising on peatland, carbon-rich soils and priority peatland habitats in development management | NatureScot](#) 2023, and the [Peatland ACTION – Technical Compendium](#), which provides more detailed advice on peatland restoration techniques. Unless the excavated peat is certain to be used for construction purposes in its natural state on the site from where it is excavated, it will be subject to regulatory control. The use of excavated peat off-site, including for peatland restoration, will require the appropriate level of environmental

authorisation. Excavated peat will be waste if it is discarded, or the holder intends to or is required to discard it. These proposals should be clearly outlined so that we can identify any regulatory implications of the proposed activities. This will allow the developer and their contractors to tailor their planning and designs to accommodate any regulatory requirements. Further guidance on this can be found in the document [Is it waste - Understanding the definition of waste.](#)

3. Water environment

- 3.1 Policy 11 of NPF4 requires that the project design and mitigation demonstrate how impacts on hydrology, the water environment and flood risk are addressed. The proposals should demonstrate how impacts on local hydrology have been minimised and the site layout designed to minimise watercourse crossings and avoid other direct impacts on water features. Measures should be put in place to protect any downstream sensitive receptors.
- 3.2 The submission must include a set of drawings showing:
- a) The footprint of all proposed temporary and permanent infrastructure (including all the ancillary construction work areas, for example excavations, landraising and other groundworks, storage, laydown and working areas) overlain with all waterbodies.
 - b) The minimum buffer around each waterbody, as detailed in Table 1 of [Recommended Riparian Corridor Layer for use in Land Use Planning](#), from all construction activities including working and storage areas, or 50m where subsurface activities are more than 1m in depth. If these minimum buffers cannot be achieved each breach must be numbered on a plan with an associated photograph of the location, dimensions of the waterbody, drawings of what is proposed in terms of any engineering works, and details of why the minimum buffer cannot be achieved and mitigation measures to protect the feature.

- c) A map showing the location, size, depths and dimensions of all borrow pits overlain with all waterbodies within 250m and showing a site-specific buffer around each waterbody proportionate to the depth of excavations. The information provided needs to demonstrate that a site-specific proportionate buffer can be achieved.

3.3 Further advice and our best practice guidance are available on our sepa.org.uk/regulations/water/engineering/ webpage. Guidance on the design of water crossings can be found in the [Construction of River Crossings Good Practice Guide](#).

4. Groundwater Dependent Terrestrial Ecosystems and existing groundwater abstractions

- 4.1 The construction and operation of developments can disrupt groundwater flow and impact on Groundwater Dependent Terrestrial Ecosystems (GWDTE), which are protected under the Water Framework Directive, and existing groundwater abstractions. The layout and design of the development must avoid adverse impacts on such areas, ensuring the water environment, including GWDTE and existing groundwater abstractions, are protected.
- 4.2 As detailed in our [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) and the [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#), a phased approach to the assessment of risks to GWDTE and groundwater abstractions is recommended, with greater detail being required for higher risk sites or activities.
- 4.3 Where monitoring is required, please note that baseline monitoring is expected to commence at least 12 months ahead of the development works starting on site and this should be factored into the timescales for submitting the Environmental Impact Assessment Report (EIAR) and commencement of development.

Groundwater Dependent Terrestrial Ecosystems (GWDTE)

4.4 A Phase 1 habitat survey should be provided unless the developer is already aware that GWDTE are likely to be present. Where initial assessment results indicate relevant habitats may be present, a National Vegetation Classification (NVC) survey should be submitted, along with the following information:

- a) A set of drawings demonstrating all GWDTE are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved, a conceptual site model (CSM) should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime, and the ecological features present. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling in addition to topography, properties of the emergent water and the soil, and underlying geology. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Dependent Terrestrial Ecosystems](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.
- c) Please note that while we will accept The UK Habitat Classification System (UKHab) as an alternative to a Phase 1 habitat survey, due to discrepancies in habitat definition and ambiguity in correspondence with NVC types, we do not accept the use of the UKHab as an alternative to NVC.

Existing groundwater abstractions

4.5 The source (rather than the property it supplies) of both public and private water supply groundwater abstractions, both within and outwith the site boundary, should be identified. Scottish Water holds information regarding public water supplies and the Local Authority holds records of private water supplies. Note that the information held by the Local Authority will sometimes relate to the property served by the

private water supply, rather than the location of the source itself (e.g. the house rather than the borehole or spring). Therefore, the details of each private water supply source require confirmation, including a site walkover survey.

4.6 The following information should be submitted where the assessment results indicate groundwater supplies may be present:

- a) A set of drawings demonstrating all groundwater abstractions are outwith a 10m radius of all activities, 100m radius of all excavations shallower than 1m and outwith 250m of all excavations deeper than 1m. The survey needs to extend beyond the site boundary where the distances require it.
- b) If the minimum buffers cannot be achieved a conceptual site model should be provided that includes interpretation of the hydrogeological setting, including the groundwater flow regime. This may be supported, as appropriate, by intrusive ground investigation, groundwater monitoring, or groundwater modelling. Please refer to [Guidance on Assessing the Impacts of Developments on Groundwater Abstractions](#) for further advice on undertaking detailed site specific qualitative and/or quantitative risk assessments and the minimum information we require to be submitted.

5. Flood risk

- 5.1 We reiterate that, as detailed above, our position and advice is based on the determining authority determining that the proposal is supported under Policy 22, as defined in NPF4, unless we are advised otherwise.
- 5.2 Advice on flood risk is available at [Flood Risk Standing Advice](#) and reference should also be made to [Controlled Activities Regulations \(CAR\) Flood Risk Standing Advice for Engineering, Discharge and Impoundment Activities](#).
- 5.3 Crossings must be designed to accommodate the 0.5% annual exceedance probability flows with an appropriate allowance for climate change, or information

provided to justify smaller structures. Our [Climate change allowances for flood risk assessment in land use planning](#) guidance sets out required allowances for climate change.

- 5.4 In order to establish that the five bullet points within NPF4 Policy 22a have been satisfied and where it is considered the development could result in an increased risk of flooding to a nearby receptor, then a flood risk assessment (FRA) must be submitted. Our [Technical Flood Risk Guidance for Stakeholders](#) provides generic requirements for undertaking Flood Risk Assessments as well as our [Climate change allowances for flood risk assessment in land use planning](#) guidance.
- 5.5 The FRA should specifically address the following issues:
- a) All existing watercourses and drains on the site are fully identified and flow pathways understood in relation to the 1 in 200 year plus climate change flood levels for the catchment.
 - b) The modelling should extend far enough upstream to capture any flow pathways which may impact the development site.
 - c) Demonstration there is no increased flood risk to existing properties in the vicinity of the proposed development and, if possible, demonstrate an improvement.
 - d) Any intended realignment or alteration of channels should also be outlined and accounted for within the FRA, with analysis showing pre and post development flood risk.
 - e) Where applicable, flows should be shown to be accommodated within any altered channel to avoid flooding of existing structures, access roads or increased risk for others.

5.6 Generally, we are unable to support landraising within a flood risk area unless it is required for development outlined under the exceptions in Policy 22a of NPF4. Which, as indicated above, we understand this proposal is unless notified otherwise, and as such we may be able to accept. However, where landraising is proposed within the flood risk area identified within the FRA, it should be linked to compensatory storage and demonstrated that there is no reduction in floodplain capacity, or increased risk for others. Notwithstanding this, any landraising must be shown to be minimised as far as possible.

5.7 Culverting for land gain would not be supported by us. If any works to alter watercourse channels are proposed, we would expect betterment to the channel and utilisation of this opportunity to help reduce flood risk to the wider site and any other nearby receptors.

6. Environmental enhancements

6.1 Policy 3 of NPF4 requires all EIA development to demonstrate that the proposal will conserve, restore and enhance biodiversity, including nature networks, so they are in a demonstrably better state than without intervention. EIA development should fully mitigate potential negative effects prior to identifying biodiversity enhancements, with the enhancements provided in addition to mitigation. We have published a data set which identifies where riparian planting would be most beneficial. This is available via the data publication page at sepa.org.uk/environment/environmental-data/. We highlight there may be opportunities for riparian planting along watercourses within landownership boundaries and would welcome the exploration of such planting as part of any biodiversity net gain proposals.

7. Forest removal and forest waste

7.1 If forestry is present on the site, the site layout should be designed to avoid large scale felling, as this can result in substantial amounts of waste material and a peak in release of nutrients which can affect local water quality.

- 7.2 The submission must include drawings with the boundaries of where felling will take place and a description of what is proposed for this timber in accordance with [Use of Trees Cleared to Facilitate Development on Afforested Land – Joint Guidance from SEPA, SNH and FCS](#) and our guidance [Management of Forestry Waste](#).

8. Pollution prevention and environmental management

- 8.1 The submission must include a schedule of mitigation, which includes reference to best practice pollution prevention and construction techniques (for example, limiting the maximum area to be stripped of soils and peat at any one time) and regulatory requirements. Please refer to the [Guidance for Pollution Prevention](#) (GPPs), along with our [sepa.org.uk/regulations/water/construction/](#) and [sepa.org.uk/regulations/water/pollution-control/water-run-off-from-construction-sites/](#) webpages, for more information and advice.

- 8.2 A commitment must also be included in the schedule of mitigation that micro-siting will not encroach into sensitive areas, to avoid adversely affecting mitigation measures identified in the EIAR that seek to avoid and/or minimise adverse effects on sensitive receptors (eg peat, watercourse and GWDTE buffers).

9. Life extension, repowering and decommissioning

- 9.1 The discarding of materials as waste should be avoided and the [waste hierarchy](#) applied to waste produced during construction, operation and decommissioning of the development. If there is an intention to discard materials then further guidance on this can be found in [Is it waste - Understanding the definition of waste](#), and our [sepa.org.uk/regulations/waste/](#) and [sepa.org.uk/regulations/waste/guidance/](#) webpages.

10. Other planning matters

- 10.1 For all other planning matters, we refer you and the developer to the relevant standing advice in our [Triage guidance and standing advice](#), which is also applicable to Electricity Act applications.

11. SEPA authorisation

- 11.1 We authorise several matters relating to water, waste management, radioactive substances, and pollution prevention and control. In 2018, the Scottish Government brought in the Environmental Authorisations (Scotland) Regulations 2018 (EASR 2018). The aim of these Regulations is to provide a standardised, simplified, common framework for environmental authorisations in Scotland, known as an Integrated Authorisation Framework (IAF). A copy of the draft Environmental Authorisations (Scotland) Amendment Regulations 2025 can be found at legislation.gov.uk/sdsi/2025/9780111062319/introduction.
- 11.2 The IAF is being developed in a phased manner during 2025, with the regulations applying initially to radioactive substances activities in early 2025. For further information on the amendment of the regulations please refer to our sepa.org.uk/regulations/how-we-regulate/environmental-authorisations-scotland-regulations-2018/ webpage.
- 11.3 It is an applicant's responsibility to ensure their proposals will meet all relevant regulatory requirements and they are working within regulatory guidelines. We prefer all the technical information required for any SEPA authorisations to be submitted at the same time as the planning or similar application. We consider it to be at the applicant's commercial risk if planning permission is granted for a development/process which cannot gain authorisation from us, or if any significant changes required during the regulatory stage necessitate a further planning application or similar application and/or neighbour notification or advertising.
- 11.4 Our sepa.org.uk/regulations/ webpage provides good practice advice and guidance and defines those activities which may require authorisation by SEPA, along with details of how to contact us for more help, advice and how to apply for any necessary authorisations.

Appendix 2: SEPA's additional EIA scoping requirements by type of development

The below advice should be read in conjunction with the scoping advice in [Appendix 1](#) above.

2. Overhead lines (OHL)

- 2.1 The submission must clearly detail which associated elements of the development, such as temporary site compounds, mobile welfare units and temporary workers accommodation, are included as part of the application and which of these are off-site and/or will be subject to separate planning application(s). Information should also be provided on how the development will be accessed. The location of permanent and temporary tracks should be confirmed and whether tracks are to be cut or floated. Areas for temporary tracks or boards should also be indicated but need not be surveyed.
- 2.2 An initial phase of peat probing should take place in all locations where mapped information suggests peat may be present. Further detailed probing need only take place in locations where initial survey suggests peat greater than 1 m is present.
- 2.3 Construction compounds, storage of temporary materials, siting of workers accommodation and mobile welfare units should be stored/located outwith the Future Flood Extent as shown on the [SEPA - Flood Maps](#).
- 2.4 Where the works are, in the most part, an upgrade to existing transmission infrastructure that is already in place, our interests are around the ground clearance works, any new and upgraded access tracks and the pollution prevention and environmental management measures that are proposed to mitigate the risk associated with the construction phase works.

FAO Sent by email to: Paul Wilson paul.wilson2@gov.scot

Your Ref: ECU00006196

Our Ref: CPA181017

Date: 4 August 2025

Dear Mr Wilson

Electricity Act 1989

The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 Request for Scoping Opinion for Proposed Section 37 Application for the Denny to Wishaw Network Upgrade (DWNO) - ECU00006196

Thank you for your consultation request dated 16 July 2025. The Applicant, SP Energy Networks (SPEN), has engaged with us throughout the earlier planning stages of this proposal. We have provided feedback to them, primarily focused on statutory protected areas and protected species where the work associated with the upgrading of the Network has potential to affect the protected natural features of protected areas.

Background

The Applicant intends to submit four separate applications to the Scottish Ministers for consent under section 37 of the Electricity Act 1989 for each of the Up-rated Overhead Lines Scoping Report Denny to Wishaw Network Upgrade as well as the New-build Overhead Line.

The Applicant proposes to prepare a single EIA Report (EIAR) for the New-build Overhead Line and Up-rated Overhead Lines which will accompany separate applications for section 37 consent for each overhead line with the scope of the assessments reflecting the difference in likely significant effects on the environment between up-rated and the new overhead line.

NatureScot comments on Scoping Report

SPEN's approach to consultation affords us the confidence that the right level of information is being gathered to inform their Environmental Impact Assessment (EIA).

We note that the scope has been proposed in the absence of detailed design of each component of the Project and look forward to further information about the detail when it is available. We

also understand that the New-build Overhead Line is likely to result in relatively more impacts and potential for effects than the uprating of overhead lines and advise that both should be assessed.

We note the intent to update the habitat survey that will be completed within 100m of the Project (including all temporary access tracks, construction compounds etc.), to establish and map any changes in baseline conditions. We also understand that it is not proposed to prepare BNG assessments for the Uprated Overhead Lines, and therefore Habitat Condition Assessments are not required. Please see our guidance on biodiversity enhancement in our pre-application and scoping advice (see link below).

We agree with the topics and issues proposed to be scoped in and out and offer the following advice.

Standing advice

The applicant should refer to our standing pre-application advice for onshore wind farms however much of the guidance is also applicable to other developments, <https://www.nature.scot/doc/naturescot-pre-application-guidance-onshore-wind-farms>. This provides guidance, updated since the publication of National Planning Framework 4 (NPF4), on the issues that developers and their consultants should consider including information on recommended survey methods, sources of further information / guidance, methods of assessment, and data presentation. Attention should be given to the full range of advice included in the guidance note.

The guidance will be further updated over time to reflect any changes to available information and our guidance, so users should ensure they download the most up to date version before use

The full range of our standing advice and guidance can be found at:

<https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-standing-advice-and-guidance-documents>

Specific advice on key issues identified at Scoping stage

Protected Areas

We acknowledge that there are no designated sites for Geological interest in or within the vicinity of the project area.

We agree with the protected areas (Slamannan Plateau Special Protection Area (SPA), Firth of Forth SPA, Woodend Loch Site of Special Scientific Interest (SSSI), Bishop Loch SSSI) that have been identified to be included in the Ecological surveys and with the suggested survey types.

Slamannan Plateau Special Protection Area

We agree that we consider that sufficient data has been collected for the non-breeding Taiga Bean Goose qualifying interest surveys. Taiga Bean Geese are well monitored, and as there is little other bird interest in the area, there is no need for further survey work by the applicant.

We advise that the protected areas that have been scoped out of the report are appropriate and that there will be no likely significant effect on those SACs named in the scoping report as they are all are all over 2 km from the Project and separated from the Project by roads and other infrastructure, with no hydrological connectivity to the Project. We also support the scoping out of

the Garrion Gill SSSI, North Bellstane Plantation SSSI, and Lady Bell's Moss SSSI and understand that these all fall within 2 km of the Project but are separated from the Project by roads and other infrastructure, with no connection to the Project. We warmly welcome that no component of The Project directly intersects the Slamannan Plateau SPA/SSSI.

Peatland

We note that there are two localised areas of Class 1 (*national important carbon-rich soils, deep peat and priority peatland habitat which are likely to be of high conservation value*) soils present beneath the New-build Overhead Line to the east of Cumbernauld Substation. The larger of the two areas is located north of Old Shields. We understand that Peat depth surveys associated with the new-build overhead line (where potential Class 1 carbon-rich soils are present) will be undertaken to allow estimations of peat depth and extent and facilitate avoidance of the deepest areas of peat.

We welcome that the EIAR for the overhead line project components will include further baseline peat survey information, and an assessment of impacts on peat, including required mitigation.

Please see the following guidance <https://www.nature.scot/doc/advising-peatland-carbon-rich-soils-and-priority-peatland-habitats-development-management>.

Protected Species

Nesting Birds

The work will require a detailed Bird Protection Plan such that any works carried out during the general breeding season doesn't damage or disturb breeding birds. Any nests found will need to be avoided and monitored to determine if disturbance is taking place and then activities adapted accordingly.

Great Crested Newt

We warmly welcome the use of eDNA surveys for ponds and the surveying methods used for the New-build Overhead lines, the Uprated Overhead lines and the Substation works.

Otter

We agree that as Otter surveys in 2022 showed evidence of presence (including holts) a species protection plan including pre-construction surveys will be required.

Water vole

We support the proposed second water vole survey. It should be noted that in areas such as Easterhouse there are Fossorial water voles that inhabit grassland areas and are therefore likely to be away from the main water courses and should be considered in surveys for water voles.

Badger and Pine Marten

We agree that pre-construction surveys will be required as part of construction mitigation and advise that species protection plans and licences may be necessary.

Bats

We agree that where trees or structures are identified as suitable for bats, further survey to determine presence/likely absence of roosting bats will be needed. We commend the intention that the Project will generally seek to avoid linear features (e.g. hedgerows) which could be used by bats for these purposes and will over-sail suitable bat habitat as far as possible. Any minor impacts on habitat which could be of value to foraging or commuting bats will be mitigated

through standard and straightforward measures (e.g. replanting of any hedgerow which is removed to facilitate construction).

Please see the protected species advice on our website <https://www.nature.scot/professional-advice/planning-and-development/planning-and-development-advice/planning-and-development-protected-species> and https://www.spenergynetworks.co.uk/userfiles/file/Appendix_12_Species_Protection_Plans.pdf

Concluding remarks

The advice in this letter is provided by NatureScot, the operating name of Scottish Natural Heritage and is given without prejudice to a full and detailed consideration of the impacts of the proposal if submitted for formal consultation as part of the EIA or planning process.

Please contact Lisa.Ford@nature.scot if you require any further information or advice.

Yours sincerely

Lisa Ford
Operations Officer – West Central

By email

18 July 2025

Dear Sir/Madam,

**REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37 APPLICATION
FOR THE DENNY TO WISHAW NETWORK UPGRADE (DWN0). ECU00006196**

Thank you for the opportunity to respond to this scoping opinion. The British Horse Society (The BHS) represents the interests of the 3.4 million people in the UK who ride or who drive horse-drawn vehicles and is the largest and most influential equestrian charity in the UK. The BHS is committed to protecting and promoting the interests of all horses and the people who care for them through our work in education, welfare, safety and access.

Outdoor Access

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Under the terms of the Land Reform (Scotland) Act 2003, equestrians have the same rights of access to the outdoors as other non-motorised users, such as pedestrians and cyclists. Equestrian use should therefore be included when planning and designing energy infrastructure. Considering all access takers, including equestrians, in the early stages helps to avoid problems down the line and ensures that projects like this are an opportunity to preserve and improve access for all, rather than curtail it or restrict it to certain groups.

The creation and upgrading of paths and tracks within developments can be an opportunity to improve outdoor access and provide the local community with additional amenity, especially if consideration is given to laying out tracks to provide circular loops. To achieve this outcome, when completed, paths and tracks should be suitable for all users. Unconsolidated sharp stone is likely to injure horses so tracks should be finished with a layer of consolidated whin dust. Obstructions to access like locked gates or deer grids with no side gate should be avoided.

The BHS is here to help and can provide guidance on suitable surfaces and infrastructure to accommodate equestrians and other access takers. We would be very willing to work with the applicant on these aspects.

The Importance of Off-Road Riding

Access to safe off-road riding routes is vital to the health and wellbeing of horses and their riders. Equestrian road users are classed as vulnerable as they are more likely to be involved in a road accident and more likely to suffer the worst consequences.

Most riding accidents happen on minor roads and with increasing numbers of horses and riders seeking to access the countryside, adequate access to off-road riding should be a priority, especially in rural and semi-rural areas, and areas of high horse ownership. Few riders access busy roads by choice (although the horse has as much right to be on public roads as cars, bikes and pedestrians) - but they often have few other places to ride or no other way to access their safe off-road riding.

Vehicles travelling to and from the site are likely to meet equestrians on the road and drivers should be advised of this risk. I have enclosed a copy of our *"Guidance to drivers of large vehicles"* document.

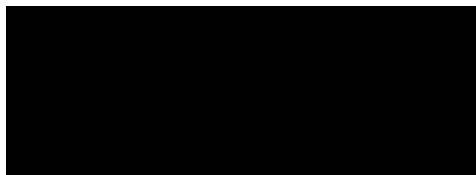
The Horse and the Rural Economy

Scotland's equestrian industry is worth over £300 million to the Scottish economy annually. This figure excludes the value of the horse racing industry, which is worth a further £300 million. Equestrianism is therefore an important part of the rural economy, especially in areas of high horse ownership. Recent joint research between SRUC and The BHS showed current trends in the sector point to a continued increase in horse numbers and riding activity in all geographical areas of Scotland and across a wide cross section of society, leading to growth in the sector.

A national survey of riders who had recently given up their horse found that 27% of them had done so because they had lost access and had nowhere to ride. Failing to accommodate horses on our local path networks may lead to riders being forced to give up their horses, which in turn may damage the local economy.

I trust that the above information is of assistance. If you have any questions or would like to discuss the needs of equestrians further, please do contact me.

Kind regards,



Anne Scott
Administration Officer
The British Horse Society

access@bhs.org.uk

02476 840515

From: radionetworkprotection@bt.com
To: [Paul Wilson](#); [Econsents Admin](#)
Cc: radionetworkprotection@bt.com
Subject: RE: WID13947 Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196
Date: 23 July 2025 11:33:17
Attachments: [image002.jpg](#)
[image003.png](#)
[image004.png](#)
[image005.jpg](#)
[image006.png](#)

General

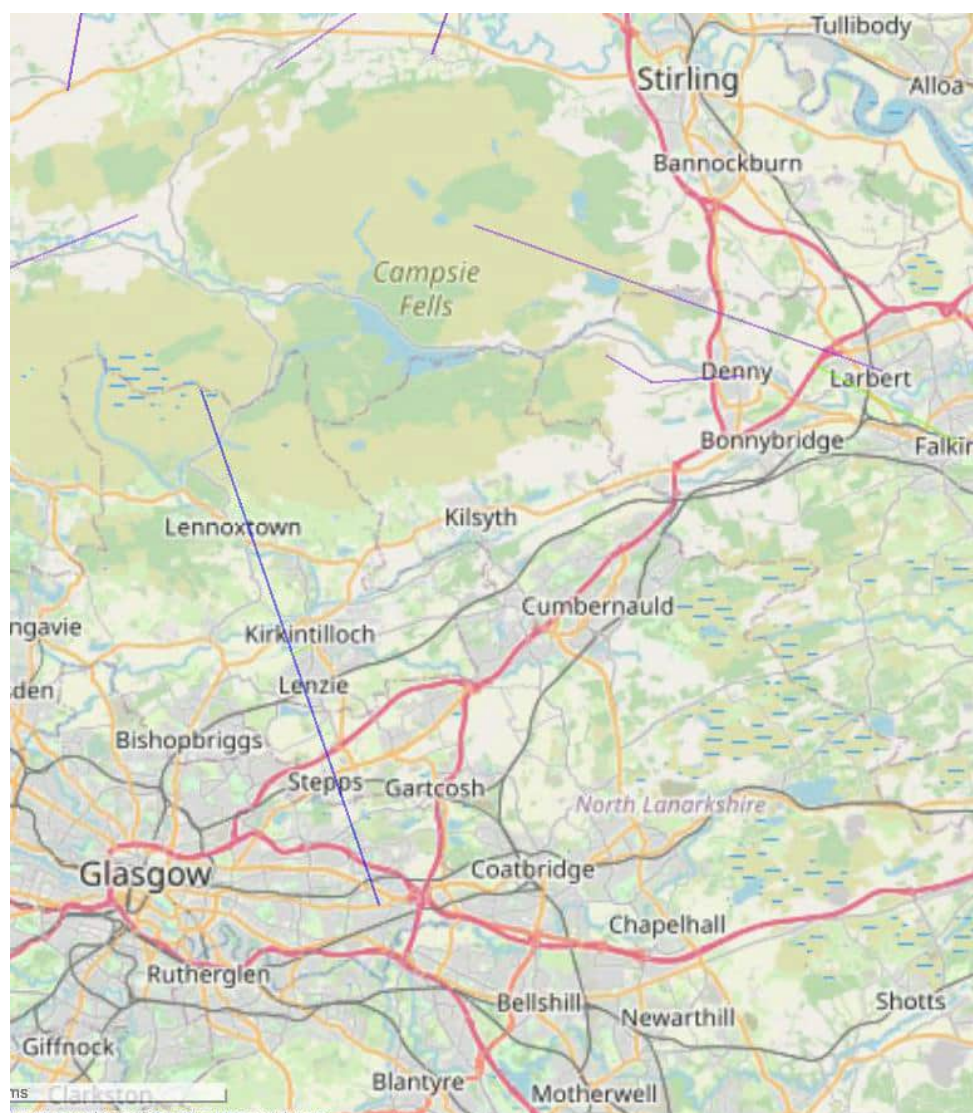
**OUR REF; WID13947**

We have studied this proposal using the site boundary below from the scoping report online, with respect to EMC and related problems to BT point-to-point microwave radio links.

The conclusion is that this proposal could cause interference to BT's current and presently planned radio network. We have active radio links demonstrated as purple lines below so will require confirmation if there are any new structures (including any temporary) along with their heights and co-ordinates to be able to carry out an assessment.

BT requires 100m minimum clearance from any structure at height to the radio link path. It should be noted that this decision is for the date of its issue as the use of the spectrum is dynamic and can change on an ongoing basis. Therefore, please reconsult us if there are any further changes during the planning process with heights and locations of any structures, and its finalisation, as we may have new links assigned by Ofcom over its duration.

Please note this refers to BT Radio Links only, you will need to contact other providers separately for information relating to other supplier links / equipment.







Defence Infrastructure Organisation

Paul Wilson
Directorate for Energy and Climate Change
Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Victoria James
Ministry of Defence
Safeguarding Department
St George's House
DIO Headquarters
DMS Whittington
Lichfield
Staffordshire
WS14 9PY

E-mail: DIO-safeguarding-statutory@mod.gov.uk

www.mod.uk/DIO

6th August 2025

Your reference: ECU00006196

Our reference: DIO10051972

Dear Paul Wilson,

MOD Safeguarding- RAF Low Flying Area 16

Proposal: Request for Scoping Opinion for proposed Section 37 application Denny to Wishaw Network Upgrade.

Location: Denny to Wishaw.

Grid Refs:	284208	681145
	284938	679724
	284068	678583
	282006	676592
	279956	675062
	278143	673214
	278332	671476
	275633	668602
	276728	667189
	270237	667008
	282359	684621
	276554	656882
	279352	662002

Thank you for consulting the Ministry of Defence (MOD) on the above proposed development which was received by this office 16th July 2025.

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a consultee in UK planning and energy consenting systems to ensure that development does not compromise or degrade the operation of defence sites such as

aerodromes, explosives storage sites, air weapon ranges, and technical sites or training resources such as the Military Low Flying System.

This consultation seeks scoping opinion advice for the proposed Section 37 application for the 'Denny to Wishaw Network Upgrade'. The proposals comprise multiple components including increasing the operating voltage of existing overhead powerlines from 275 to 400 kilovolts (kV), the construction of a new 400kV overhead line as well as upgrades to existing substations.

At this stage and on the basis of the information currently available, I can confirm that the MOD has concerns due to those aspects of the proposal set out below.

Physical Obstruction

The application site falls within part of the UK Military Low flying System designated specifically Low Flying Area 16 (LFA 16), an area within which fixed wing aircraft may operate as low as 250 feet or 76.2 metres above ground level to conduct low level flight training. The addition of tall and/or narrow structures such as lattice towers over 50 metres in this location has the potential to introduce a physical obstruction to low flying aircraft operating in the area.

In order to assess the impact on LFA 16 the MOD must be further consulted on the heights and locations of any tall and narrow structures over 50 metres above ground level so that a full assessment can be completed.

Summary

At this early consultation stage, where no precise details are available for the exact heights of locations of the proposed overhead powerline lattice towers, MOD representations are limited to the principle of the development only.

In summary the MOD has concerns and requests that the MOD should be consulted at all future stages for this proposed development to complete a full detailed safeguarding assessment.

The MOD must emphasise that the advice provided within this letter is in response to the data and/or information detailed above/in the developer's documents titled Scoping Report dated June 2025. Any variation of the parameters (which include the location, dimensions, form, and finishing materials) detailed may significantly alter how the development relates to MOD safeguarding requirements and cause adverse impacts to safeguarded defence assets or capabilities. In the event that any amendment, whether considered material or not by the determining authority, is submitted for approval, the MOD should be consulted and provided with adequate time to carry out assessments and provide a formal response.

I trust this is clear however should you have any questions please do not hesitate to contact me.

Yours sincerely



Vicki James
Assistant Safeguarding Manager
DIO Safeguarding

From: [LUP enquiries](#)
To: [Paul Wilson](#)
Subject: Fw: Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196
Date: 06 August 2025 11:20:37
Attachments: [image001.png](#)
[Outlook-5c330v34.png](#)

Dear Sir/Madam,

Thank you for your EIA scoping opinion request (sent to HSE's email address HazSubConsent.CEMHD5@hse.gov.uk), from 18 July 2025, seeking comments regarding a request for an Environmental Impact Assessment (EIA) Scoping Opinion, under Section 37 of the Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017, relating to Denny to Wishaw Network Upgrade (DWNO) project.

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

- HSE's response is limited to our role in the land use planning system for the control of major industrial hazards involving hazardous substances.
- HSE is not responding in our regulatory role in the health and safety system

1. The proposed development, is not a type that would store or process hazardous substances in quantities relevant to the potential for industrial major accidents with respect to The Town and Country Planning (Hazardous Substances) (Scotland) Regulations 2015.

2. The development is not located within a safeguarding zone of an Explosives site licensed under the Explosives regulations 2014 or the Dangerous goods in harbour area regulations 2016.

3. The proposed development red line site boundary crosses a large number of major accident hazard pipelines. There is potential to initiate a major accident at the major accident hazard pipelines, for example during the development construction phase and potentially the operational phase, because the development area intersects the route of the major accident hazard pipeline.

HSE suggests that the EIA should show that the operator of the pipelines have been consulted regarding the following issues or that these issues have been considered in the assessment:

- the development restricted area due to the pipeline
- ensuring the integrity of the pipeline and protecting the pipeline from development and operational works.

HSE's advice on the granting of planning permission for relevant development in zones set by HSE considers the issue of such accidents in the vicinity affecting people at the proposed development. That HSE advice can be obtained by the planning authority by using HSE's Land Use Planning Advice web app <https://pa.hsl.gov.uk/>.

However, this application does not relate to a relevant development on which to consult the HSE Land Use Planning (LUP) Team, as it would not lead to a material increase in the number of people within a consultation distance. There is therefore no need to consult the HSE LUP team on this planning application and the HSE LUP team has no comment to make.

4. If there is a major accident hazard establishment with no HSE consultation zones, in the vicinity of the proposed development, and you are concerned that the proposed development might increase the risk or consequences of a major accident at the existing establishment then please

directly consult the operator of the establishment, as appropriate.

5. General health and safety at work

HSE realises that Environmental Risk Assessments are not expected to include general health and safety at work however we take this opportunity to point out that it may be beneficial for employer(s) to undertake a risk assessment as early as possible to satisfy themselves that their design and operation will meet requirements of relevant health and safety legislation as the project progresses.

Kind regards,
Kathryn Deakin

HSE's Land Use Planning Support Team
Health and Safety Executive | Chemicals, Explosives and Microbiological Division 5
lupenquiries@hse.gov.uk



For HSE's Land Use Planning Advice Terms and Conditions, please click on the following link [HSE's Planning Advice Web App - Login \(hsl.gov.uk\)](#) and then click on 'terms and conditions'.

The Health and Safety Executive (HSE) is conducting a programme of research to understand the needs of people using their services for Land Use Planning Advice (including HSE's planning advice web app), Hazardous Substances Consent and their related guidance. This helps us create services that work better for the public and for government. Participation is voluntary. If you would like to be informed about opportunities to participate, please read and complete this consent form: <https://forms.office.com/e/twNqwPKE9x>. If you need a different format or have questions about this research, please contact the user research team on LUPuserresearch@hse.gov.uk and we will do our best to help. Thank you.

From: [Joint Radio Company](#)
To: [Paul Wilson](#)
Subject: Re: Denny to Wishaw Network Upgrade OHL (DWNO) - ECU00006196
Date: 21 July 2025 10:36:39

Dear Sir / Madam,

Planning Ref: **ECU00006196**

Location: **Denny to Wishaw Network Upgrade OHL (DWNO)**

Proposal: OHL

Link:

Site at NGR / IGR : **NOT SUPPLIED**

Hub Height: **NOT SUPPLIED**

Blade Radius: **NOT SUPPLIED**

For OHL we need the pylon positions and heights to assess if problematic or not.

JRC analyses proposals for wind (and other) developments on behalf of the UK Energy Industry. We assess the potential of such developments to interfere with radio systems operated by UK and Irish Energy Industry companies in support of their regulatory operational requirements.

In order to fully assess this proposal we require the name of the development, turbine locations (NGR values: easting and northing), hub height and rotor diameter for each turbine.

Therefore JRC OBJECTS to the proposed development *** *due to insufficient information* ***.

However, JRC are still willing to work with developers in order to clear as many developments as possible, including those that may initially fall within the coordination zone. For more information about what to do next, please contact us using the link at the bottom of this email.

NOTE:

The protection criteria determined for Energy Industry radio systems can be found at [Wind Farm Coordination | Joint Radio Company | JRC](#)

The JRC objection shall be withdrawn after simple analysis shows no issues; when a satisfactory coordination has been achieved and the zone of protection is implemented; or when an appropriate mitigation agreement is in place.

Please provide the required information in order for us to undertake the necessary analysis.

Regards

Wind Farm Team

Friars House
Manor House Drive
Coventry CV1 2TE
United Kingdom

Office: 02476 932 185

JRC Ltd. is a Joint Venture between the Energy Networks Association (on behalf of the UK Energy Industries) and National Grid.

Registered in England & Wales: 2990041

[About The JRC](#) | [Joint Radio Company](#) | [JRC](#)

We maintain your personal contact details and are compliant with the Data Protection Act 2018 (DPA 2018) for the purpose of 'Legitimate Interest' for communication with you. If you would like to be removed, please contact anita.lad@jrc.co.uk.

Our Ref: 38030226 National Gas- ECU00006196

Thursday, 17 July 2025

Jordane Maples
National Grid House Gallows Hill
Warwick
WAR
CV34 6DA

**National Gas Emergency Number:
0800 111 999***

*Available 24 hours, 7 days/week.
Calls may be recorded and monitored.
www.nationalgas.com

Asset Protection
National Gas Transmission
National Grid House
Warwick
CV34 6DA
Email: box.assetprotection@nationalgas.com
Tel: 0800 970 7000

National Gas Transmission – High Risk Response Letter

Dear Sir/ Madam,

An assessment has been carried out with respect to National Gas Transmission plc's apparatus and the proposed work location. Based on the location entered into the system for assessment the area has been found to be within the High Risk zone from National Gas Transmission plc's apparatus and you **MUST NOT PROCEED** without further assessment from Asset Protection.

Before you go ahead with these works, you are required to send your plans and a description for us to review them at box.assetprotection@nationalgas.com. We will contact you within 28 days of receipt.

It is **YOUR** responsibility to take into account whether you are required to or would benefit from referring to the HSE Land Use Planning App (LUP), available from HSE's website. (Please note for some works this is a requirement for them to take place) More information on the LUP is available at <https://www.hse.gov.uk/landuseplanning/>

Please note this response and any attached map(s) are valid for 28 days.

Yours sincerely

Asset Protection Team

Your Responsibilities and Obligations

The "Assessment" Section below outlines the detailed requirements that must be followed when planning or undertaking your activities at this location.

It is your responsibility to ensure that the information you have submitted is accurate and that all relevant documents including links are provided to all persons (either direct labour or contractors) working for you near National Gas Transmission plc's apparatus, e.g. as contained within the Construction (Design and Management) Regulations.

This assessment solely relates to National Gas Transmission plc (NGT)

This assessment does **NOT** include:

- National Gas Transmission's legal interest (easements or wayleaves) in the land which restricts activity in proximity to National Gas Transmission's assets in private land. You must obtain details of any such restrictions from the landowner in the first instance and if in doubt contact Asset Protection.
- Recently installed apparatus.
- Apparatus owned by other organisations, e.g. Cadent, National Grid Electricity Transmission plc, other gas distribution operators, local electricity companies, other utilities, etc.

It is **YOUR** responsibility to take into account whether the items listed above may be present and if they could be affected by your proposed activities.

This communication does not constitute any formal agreement or consent for any proposed development work; either generally or with regard to National Gas Transmission plc easements or wayleaves nor any planning or building regulations applications.

National Gas Transmission plc or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability where prohibited by the law nor does it supersede the express terms of any related agreements.

If you require further assistance please contact the Asset Protection team via e-mail (box.assetprotection@nationalgas.com) or via the contact details at the top of this response.

Are My Works Affected?

Is your proposal an Information Only or Planned Works Application?

Information Only

As your works are at an "Information Only" stage, any maps and guidance provided are for information purposes only. This is not approval to commence work. You must submit a "Planned Works" enquiry at the earliest opportunity and failure to do this may lead to disruption to your plans and works. Asset Protection will endeavour to provide an initial assessment within 28 days of receipt of a Planned Works enquiry and, dependent on the outcome of this, further consultation may be required. In any event, for safety and legal reasons, works must not be carried out until a Planned Works enquiry has been completed and final response received.

Planned Works

Your proposal is in proximity of National Gas Transmission plc's apparatus, as shown on the attached map, which may impact, and possibly prevent, your proposed activities for safety and/or legal reasons.

You must not commence any work until you have sent details to us at box.assetprotection@nationalgas.com and have received a response back confirming that we have no objections to the work taking place. You must read and follow all the guidance provided when planning or undertaking any activities at this location.

We will contact you within 28 working days of you providing us with the details of your work at the email address above. Please email, or call us at 0800 970 7000, if you have not had a response within this time frame.

Assessment

Affected Apparatus

The apparatus that has been identified as being in the vicinity of your proposed works is:

- National Gas Transmission Pipelines and associated equipment

Requirements

National High Pressure Gas Pipelines

BEFORE carrying out any work you must:

- Ensure that no works are undertaken in the vicinity of our gas pipelines and that no heavy plant, machinery or vehicles cross the route of the pipeline until detailed consultation has taken place.
- Carefully read these requirements including the attached guidance documents and maps showing the location of apparatus.
- Contact the landowner and ensure any proposed works in private land do not infringe National Gas Transmission's legal rights (i.e. easements or wayleaves). If the works are in the road or footpath the relevant local authority should be contacted.
- Ensure that all persons, including direct labour and contractors, working for you on or near National Gas Transmission's apparatus follow the requirements of the HSE Guidance Notes HSG47 - 'Avoiding Danger from Underground Services' This guidance can be downloaded free of charge at <http://www.hse.gov.uk>
- In line with the above guidance, verify and establish the actual position of mains, pipes, cables, services and other apparatus on site before any activities are undertaken.

DURING any work you must:

- Ensure that the National Gas Transmission requirements are followed for work in the vicinity of High pressure pipelines including the supervision of the digging of trial holes.
- Comply with all guidance relating to general activities and any specific guidance for each asset type as specified in the Guidance Section below.
- Ensure that access to National Gas Transmission apparatus is maintained at all times.
- Prevent the placing of heavy construction plant, equipment, materials or the passage of heavy vehicles over National Gas Transmission apparatus unless specifically agreed with National Gas Transmission in advance.
- Exercise extreme caution if slab (mass) concrete is encountered during excavation works as this may be protecting or supporting National Gas Transmission apparatus.
- Maintain appropriate clearances between gas apparatus and the position of other buried plant.

GUIDANCE

National Gas Transmission Network data

The Network map for National Gas Transmission assets can be downloaded at the following link in GIS format.

www.nationalgas.com/land-and-assets/network-route-maps

High Pressure Gas Pipelines Guidance:

If working in the vicinity of a high pressure gas pipeline the following document must be followed: 'Specification for Safe Working in the Vicinity of National Gas Transmission High Pressure Gas Pipelines and Associated Installation – Requirements for Third Parties' (SSW22). This can be obtained from: <Link to SSW22 once it has been updated and signed off>

Essential Guidance document:

<https://www.nationalgas.com/sites/gas/files/documents/8589934982-Essential%20Guidance.pdf>

You should be aware of the following information regarding National Gas Transmission's high pressure underground pipelines and associated apparatus:

- Our underground pipelines are protected by permanent agreements with landowners or have been laid in the public highway under our licence. These grant us legal rights that enable us to achieve efficient and reliable operation, maintenance, repair and refurbishment of our gas transmission network. Hence we require that no permanent structures are built over or under pipelines or within the zone specified in the agreement, materials or soil are not stacked or stored on top of the pipeline route and that unrestricted and safe access to any of our pipeline(s) must be maintained at all times.
- The information supplied is given in good faith and only as a guide to the location of our underground pipelines. The accuracy of this information cannot be guaranteed. The physical presence of such pipelines may also be evident from pipeline marker posts. The person(s) responsible for planning, supervising and carrying out work in proximity to our pipeline(s) shall be liable to us, as pipeline(s) owner, as well as to any third party who may be affected in any way by any loss or damage resulting from their failure to locate and avoid any damage to such a pipeline(s).
- The relevant guidance in relation to working safely near to existing underground pipelines is contained within the Health and Safety Executive's (www.hse.gov.uk) Guidance HS(G)47 "Avoiding Danger From Underground Services" and all relevant site staff should make sure that they are both aware of and understand this guidance.
- Our pipelines are normally buried to a depth of 1.2 metres or more below ground and further information may be found on the plans provided. Ground cover above our pipelines should not be reduced or increased.
- Any proposed cable crossings are subject to approval from National Gas Transmission, completion of a Deed of Consent and must remain a minimum of 600mm above or below the pipeline. All works associated with cable installation must be supervised by National Gas Transmission. Cables cannot be pulled through until a Deed of Consent is in place.
- If it is planned to use mechanical excavators and any other powered mechanical plant, it shall not be sited or moved above the pipeline.
- If it is planned to carry out excavation to a depth greater than 0.3 metres, embankment or dredging works, the actual position and depth of the pipeline must be established on site with our representative

and a safe working method agreed prior to any work taking place in order to minimise the risk of damage and ensure the final depth of cover does not affect the integrity of the pipeline.

- The digging of trial holes to locate the pipeline must be carried out under the supervision of our on-site representative following approval of RAMS. Excavation works may take place unsupervised no closer than 3 metres from the pipeline once its actual location has been confirmed. Similarly, excavation with handheld power tools may take place no closer than 1.5 metres away.
- For operational and safety reasons National Gas Transmission requires unrestricted access to our Above Ground Installations and Compressor Stations. We would request that any proposed changes to roads/layouts in the vicinity of our site have regard to the need to maintain access.
- Any construction traffic should either cross the pipeline using existing roads or at agreed crossing locations using agreed protective measures.
- Ground anchors for scaffolding stay wires should only be sited in the vicinity of the pipeline after the pipeline position has been confirmed on site with our representative and the ground anchor position agreed.
- If your proposals include the installation of wind turbines then the minimum separation between the pipeline and the nearest turbine should be 1.5 times the mast height.
- If your proposals include the installation of a Solar Farm, all assets must remain outside of the National Gas Transmission easement, all cable crossings must be agreed during the design stage, a Deed of Consent undertaken and an Earthing report must be provided for review. National Gas Transmission must retain access to its assets at all times once works have been completed.

The relocation of existing underground pipelines is not normally feasible on grounds of cost, operation and maintenance and environmental impact. Further details can be found in our specification for: safe working in the vicinity of National Gas Transmission high pressure gas pipelines and associated installations – requirements for third parties: T/SP/SSW/22 (see link above or copy enclosed)

Warning: PDF designed for A3 colour print only with no page scaling

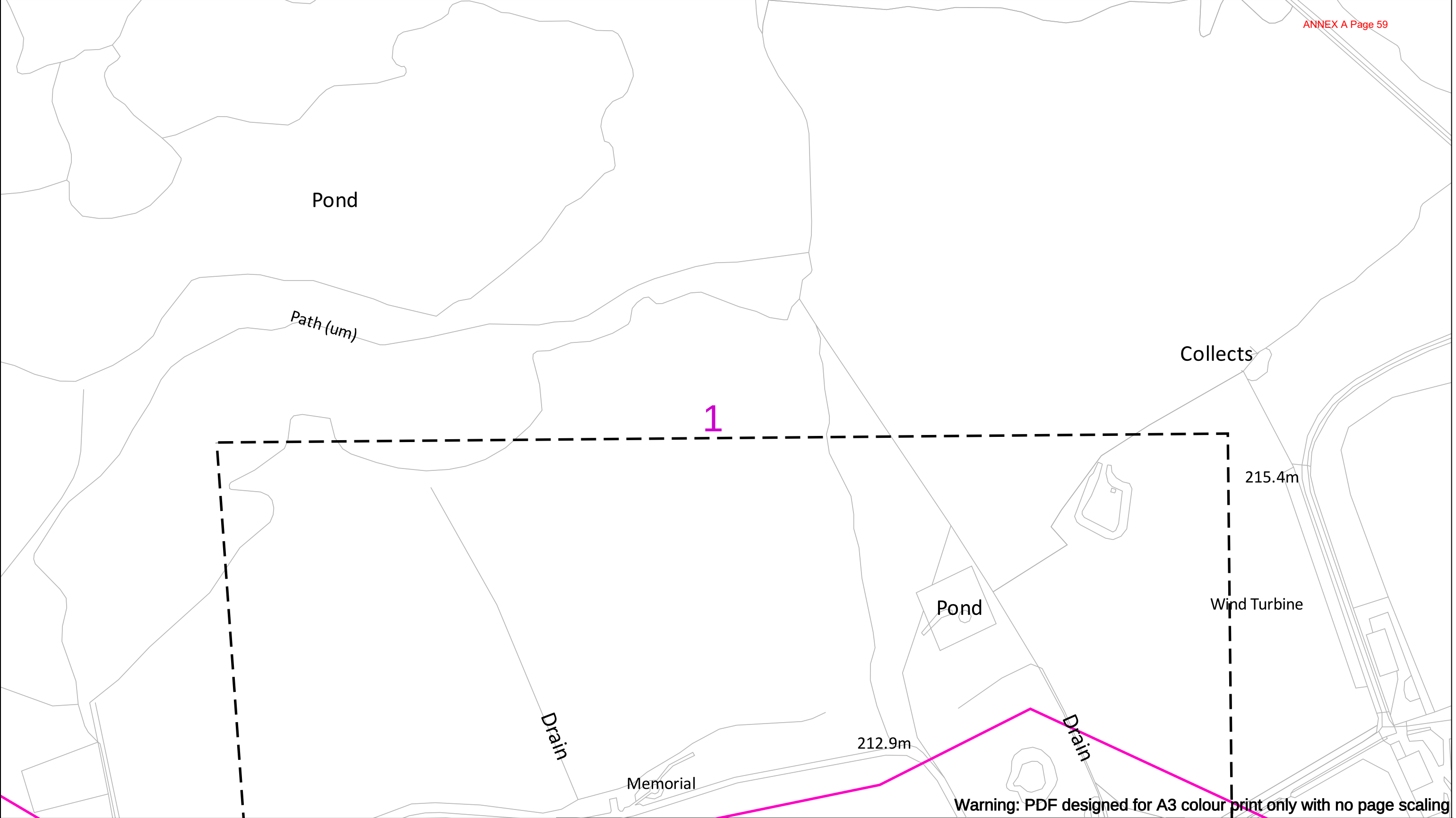
Scale: 1:5125 (When plotted at A3)

This plan shows those pipes owned by National Gas Transmission PLC in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regards to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stop connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Gas Transmission PLC or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HSG47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.

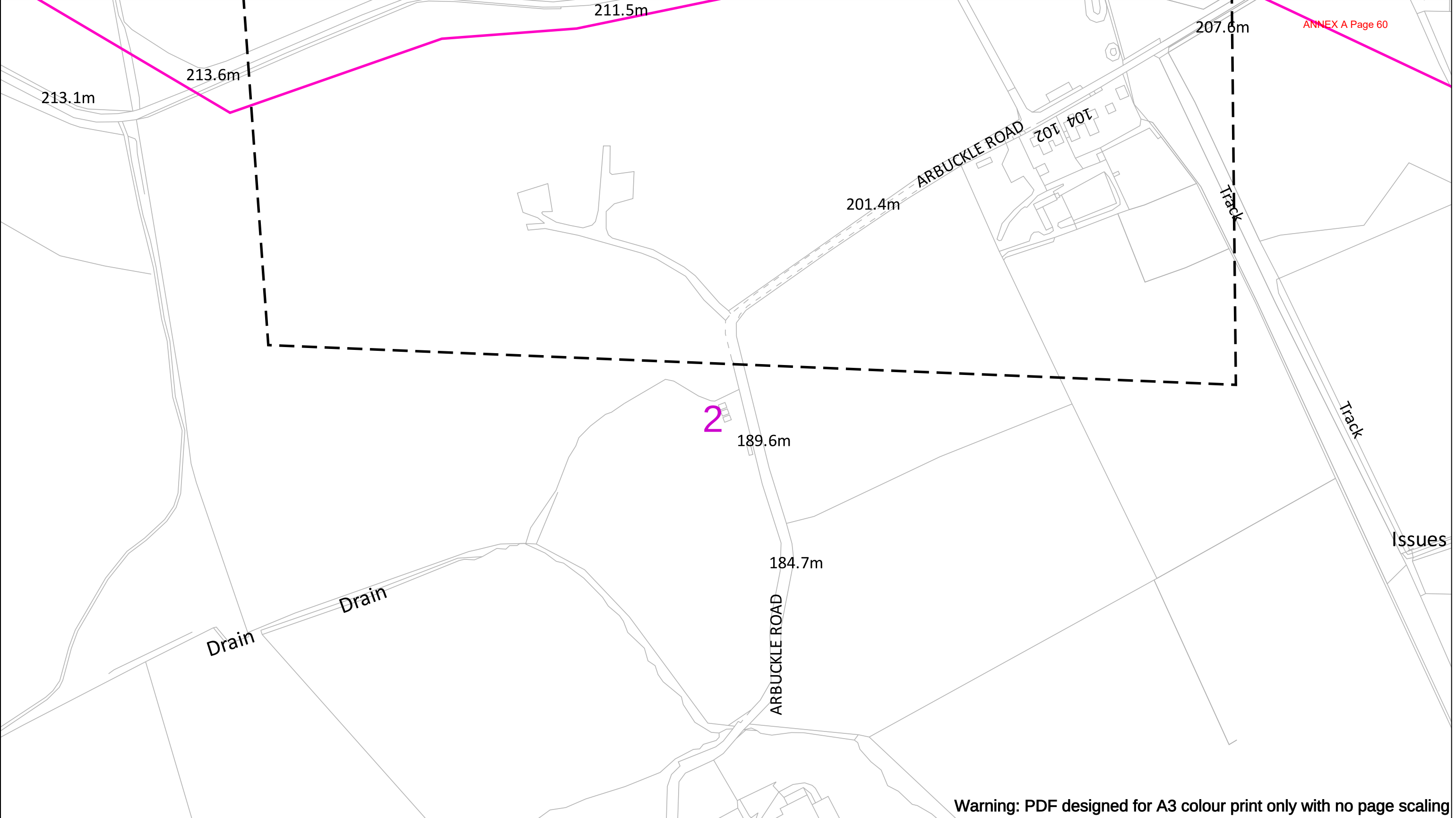
Warning: PDF designed for colour print only with no page scaling

NHP Mains





Date Requested: 17/07/2025 Job Reference: 38030226 Site Location: 279359 667970 Requested by: Miss Jordane Maples Your Scheme/Reference: National Gas- ECU00006196 Scale: 1:2500 (When plotted at A3)	IMPORTANT NOTICES This plan shows those pipes owned by National Gas Transmission PLC in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regards to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Gas Transmission PLC or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.	National Gas Transmission Emergency Number: 0800 111 999 Available 24 hours, 7 days/week. Calls may be recorded and monitored Warning: PDF designed for colour print only with no page scaling 100m Dig Sites Area: Line: NHP Mains	National Gas Transmission National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA box.assetprotection@nationalgas.com
Crown Copyright © - Reproduced by permission of Ordnance Survey on behalf of HMSO. And database right 2025. All rights reserved. Ordnance Survey Licence number 100024886			



Date Requested: 17/07/2025 Job Reference: 38030226 Site Location: 279359 667970 Requested by: Miss Jordane Maples Your Scheme/Reference: National Gas- ECU00006196 Scale: 1:2500 (When plotted at A3)	IMPORTANT NOTICES This plan shows those pipes owned by National Gas Transmission PLC in its role as a licensed Gas Transporter (GT). Gas pipes owned by other GTs, or otherwise privately owned, may be present in this area. Information with regards to such pipes should be obtained from the relevant owners. The information shown on this plan is given without warranty, the accuracy thereof cannot be guaranteed. Service pipes, valves, syphons, stub connections, etc., are not shown but their presence should be anticipated. No liability of any kind whatsoever is accepted by National Gas Transmission PLC or their agents, servants or contractors for any error or omission. Safe digging practices, in accordance with HS(G)47, must be used to verify and establish the actual position of mains, pipes, services and other apparatus on site before any mechanical plant is used. It is your responsibility to ensure that this information is provided to all persons (either direct labour or contractors) working for you on or near gas apparatus. The information included on this plan should not be referred to beyond a period of 28 days from the date of issue.	National Gas Transmission Emergency Number: 0800 111 999 Available 24 hours, 7 days/week. Calls may be recorded and monitored	Warning: PDF designed for colour print only with no page scaling	National Gas Transmission National Grid House Warwick Technology Park Gallows Hill Warwick CV34 6DA box.assetprotection@nationalgas.com
		100m Dig Sites Area: Line: NHP Mains		
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ENQUIRY SUMMARY

Received Date

17/07/2025 13:23

Work Start Date

18/07/2025

Your Reference

National Gas- ECU00006196

Location

Centre Point: 279359 667970

X Extent:

Y Extent:

Postcode: ML6 7WF

Map Options

Paper Size: A3

Orientation: LANDSCAPE

Scale: 1:2500

Real World Extents: 713m x 539m

Enquirer Details

Organisation Name: National Gas Transmission

Contact Name: Jordane Maples

Email Address: Jordane.Maples@nationalgas.com

Telephone: 08009707000 / 08009707000

Address: National Grid House Gallows Hill, Warwick , WAR, CV34 6DA

Enquiry Type

Planned Works

Activity Type

Planning Applications

Work Types

Commercial/Industrial

Notes/Works Description (if supplied)

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

Site Contact Name (if supplied)

Paul Wilson

Site Contact Number (if supplied)

07350459593

From: [Jordane Maples](#)
To: [Paul Wilson](#)
Subject: RE: Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196
Date: 24 July 2025 14:23:56
Attachments: [image001.png](#)
[image002.png](#)

Good Afternoon,

National Gas Transmission operates a high-pressure gas pipeline that runs through the land parcels proposed for development. FM10 Limrerigg to Glenmavis could be affected by AC and/or DC interference from the proposed installation.

The pipeline has a land easement in operation. No development, construction or landscaping is permitted within the easement without formal written approval from National Gas Transmission.

There are specific criteria that must be adhered to for developing electrical infrastructure near National Gas Transmission's gas pipelines to avoid unacceptable levels of interference. Subject to compliance with the acceptable interference criteria in the standards, the installation can be built adjacent to pipelines but never within the easement. It is possible that the pipelines are already experiencing acceptable levels of interference, and in such cases the level of acceptance for new constructions shall be restricted to levels that do not raise the existing levels beyond the acceptable levels defined in the standards.

Utility crossings over National Gas Transmission's gas pipelines are restricted and require formal written permission in the form of a Deed of Consent before any installation / construction within the pipeline easement is permitted.

The developer is to engage with National Gas Transmission for further guidance in the early stages of design to ensure that electrical interference, security, future access, and construction methods can be mutually agreed prior to undertaking any works on site.

Kind regards

Jordane Maples
Asset Protection Assistant
Asset Protection

07702622482
Jordane.maples@nationalgas.com



National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA
nationalgas.com | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

From: box.assetprotection

Sent: 17 July 2025 14:31

To: Paul.Wilson2@gov.scot

Subject: RE: Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196

Good Afternoon,

I am contacting you with regards to the attached planning application, please find National Gas's LSBUD response attached for your attention.

I have now passed this over to our engineer and we will provide you with a formal response as soon as possible.

Thanks

Jordane Maples

Asset Protection Assistant

Asset Protection

07702622482

Jordane.maples@nationalgas.com



National Gas Transmission, Warwick Technology Park, Gallows Hill, Warwick, CV34 6DA

nationalgas.com | [Twitter](#) | [LinkedIn](#)

Please consider the environment before printing this email.

|

From: [NATS Safeguarding](#)
To: [Paul Wilson](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Request for Scoping Opinion for proposed section 37 application Denny to Wishaw Network Upgrade (DWNO) - ECU00006196
Date: 01 August 2025 15:15:11
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.gif](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains the LPA's responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours Faithfully



NATS Safeguarding

D: 01489 444687

E: natssafeguarding@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal



The Scottish Government
Energy Consents Unit
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Network Rail
Town Planning
151 St Vincent Street
Glasgow
G2 5NW

Martin Henderson
Town Planning Technician

Planning reference: ECU00006196
Case Officer: Paul Wilson

E-Mail:
TownPlanningScotland@networkrail.co.uk

Network Rail ref: 253 2025
25/07/2025

Dear Mr Wilson,

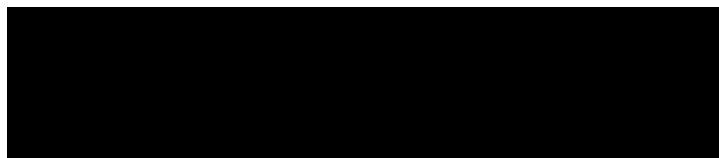
**THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT)
(SCOTLAND) REGULATIONS 2017
REQUEST FOR SCOPING OPINION FOR PROPOSED SECTION 37
APPLICATION FOR THE DENNY TO WISHAW NETWORK UPGRADE
(DWNO)**

Thank you for consulting Network Rail regarding the above development.

We would strongly suggest that reference to the issues below are included in the Scoping Opinion to ensure that potential impacts of both the construction and completed development on the current and future safe and efficient operation of the railway are assessed:

- A Traffic Assessment should be included to assess the effects of construction traffic on existing traffic flows and the public road network. Preferred construction traffic routes should be indicated. This will enable Network Rail to assess the possible impacts where/if the traffic crosses over/under our infrastructure and the suitability of these crossings.
- Details of proposed construction and engineering works in the vicinity of the railway line. Any works over/adjacent to the railway corridor will be subject to further discussion and agreement with Network Rail.

Yours sincerely



Town Planning Technician

From: [ONR Land Use Planning](#)
To: [Econsents Admin](#)
Subject: ONR Land Use Planning - Application Denny to Wishaw Network Upgrade - ECU00006196
Date: 16 July 2025 15:11:17
Attachments: [image001.png](#)
[image001.png](#)

Dear Sir/Madam,

With regard to planning application Denny to Wishaw Network Upgrade - ECU00006196, ONR makes no comment on this proposed development as it does not lie within a consultation zone around a GB nuclear site.

You can find information concerning our Land Use Planning consultation process here: (<http://www.onr.org.uk/land-use-planning.htm>).

Kind regards,

Land Use Planning

Office for Nuclear Regulation

ONR-Land.Use-planning@onr.gov.uk

SGN
Maintenance Operations
Scotland
Axis House
Edinburgh
EH28 8TG

16/07/25
Energy Consents Planning Department

Your Ref: ECU00006196

Dear Sir or Madam

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

With Reference to your recent correspondence regarding the above, I can confirm the presence of a High Pressure Gas Transmission Pipeline in the vicinity of the proposed development. The **building proximity distance for high pressure gas pipeline E05 is 15 metres**, in accordance with the recommendations of The Institution of Gas Engineers document TD/1 Edition 5.

Please be aware the proposed route crosses many different pipelines multiple times, clearly plans would be required to establish which pipelines are affected.

A site meeting must be arranged with us to identify the location of the pipeline and discussions should take place with the developer to discuss which measures would be necessary and could be undertaken in order to safeguard the security of the pipeline.

In the meantime, please treat this letter as a formal objection to this planning application until such time as a detailed consultation has taken place.

Please find enclosed an extract from our mains records in the location of the area covered by the proposed development for guidance. This plan only shows those pipes owned by SGN in its role as a Licensed Gas Transporter (GT). It should be noted that gas pipes owned by other GTs or privately owned may be present in this area and information regarding such pipes should be obtained from the owners. Where SGN knows this, they will be represented on the plans as a shaded area and/or a series of x's.

The information shown on this plan is given without obligation or warranty and the accuracy cannot be guaranteed. Service pipes, valve siphons, stub connections etc. are not shown but their presence should be anticipated. Your attention is drawn to the information disclaimer on these plans. The information included on the plan is only valid for 28 days.

Please note that the pipeline in the vicinity of the proposed development is a **Major Accident Hazard Pipeline** in terms of the Pipelines Safety Regulations 1996. Please note the HSE guidance document L82:

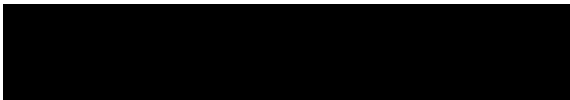
A Guide to the Pipelines Safety Regulations 1996, (<http://www.hse.gov.uk/pubns/books/l82.htm>), in particular the guidance on safety regulations 15 and 16 and the emergency plan under Regulation 25.

In addition, please note your requirements under HSE Document: *PADHI: HSE's Land Use Planning Methodology* (<https://www.hse.gov.uk/landuseplanning/padhi.htm>) for any major accident hazard pipeline.

This pipeline is also legally protected by a Deed of Servitude which restricts building and other works within the servitude area (as described in the deed).

Please contact Euan Munro(euan.munro@sgn.co.uk) to discuss plans with a view to lifting the objection.

Yours faithfully



Bryan Young
Pipeline Officer.

26/09/25

SGN
Maintenance Operations
Scotland
Axis House
Edinburgh
EH28 8TG

Energy Consents

Your Ref: ECU00006196

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

Dear Sir or Madam

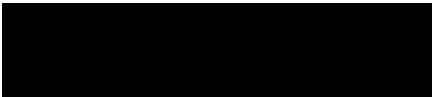
With Reference to the above, and to our letter of objection.

I can confirm that the developer has consulted with SGN and have agreed to liaise with SGN throughout the planning process. We now therefore agree to withdraw our objection to the planning application.

Please note however that should the extent or design of the planning permission be amended, then we may require further consultation with the developer.

Please note the following:

Excavations, stockpiling of material, vehicles crossing over the route of the pipeline, changes in ground levels, drilling, piling and the siting of temporary structures, cabins and containers are all activities that can have a negative impact on the pipeline. This list is not exhaustive and SGN advice should be sought if in any doubt.



Pipeline Engineer.

Tuesday, 29 July 2025



Local Planner
Energy Consents Unit
5 Atlantic Quay
Glasgow
G2 8LU

Development Operations
The Bridge
Buchanan Gate Business Park
Cumbernauld Road
Stepps
Glasgow
G33 6FB

Development Operations
Freephone Number - 0800 3890379
E-Mail - DevelopmentOperations@scottishwater.co.uk
www.scottishwater.co.uk



Dear Customer,

**Denny to Wishaw Network Upgrade (DWNO) Bonnybridge substation,
Glenmavis, ML2 7AB
Planning Ref: ECU00006196
Our Ref: DSCAS-0137249-33D
Proposal: Proposed development is for the installation of approximately 19km
of 400kV overhead line, supported by steel lattice towers, between
Bonnybridge substation and Glenmavis.**

Please quote our reference in all future correspondence

Audit of Proposal

Scottish Water has no objection to this proposal. Please read the following carefully as there may be further action required. Scottish Water would advise the following:

Drinking Water Protected Areas

A review of our records indicates that there are no Scottish Water drinking water catchments or water abstraction sources, which are designated as Drinking Water Protected Areas under the Water Framework Directive, in the area that may be affected by the proposed activity.

Asset Impact Assessment

Scottish Water records indicate that there is live infrastructure in the proximity of your development area that may impact on existing Scottish Water assets.

The applicant must identify any potential conflicts with Scottish Water assets and contact our Asset Impact Team via our Customer Portal for an appraisal of the proposals.

The applicant should be aware that any conflict with assets identified will be subject to restrictions on proximity of construction. Please note the disclaimer at the end of this response.

Written permission must be obtained before any works are started within the area of our apparatus

Surface Water

For reasons of sustainability and to protect our customers from potential future sewer flooding, Scottish Water will not accept any surface water connections into our combined sewer system.

There may be limited exceptional circumstances where we would allow such a connection for brownfield sites only, however this will require significant justification from the customer taking account of various factors including legal, physical, and technical challenges.

In order to avoid costs and delays where a surface water discharge to our combined sewer system is anticipated, the developer should refer to our guides which can be found at <https://www.scottishwater.co.uk/Help-and-Resources/Document-Hub/Business-and-Developers/Connecting-to-Our-Network> which detail our policy and processes to support the application process, evidence to support the intended drainage plan should be submitted at the technical application stage where we will assess this evidence in a robust manner and provide a decision that reflects the best option from environmental and customer perspectives.

Next Steps:

All developments that propose a connection to the public water or waste water infrastructure are required to submit a Pre-Development Enquiry (PDE) Form via our Customer Portal prior to any formal technical application being submitted, allowing us to fully appraise the proposals

I trust the above is acceptable however if you require any further information regarding this matter please contact me on **0800 389 0379** or via the e-mail address below or at planningconsultations@scottishwater.co.uk.

Yours sincerely,

Ruth Kerr

Development Services Analyst

PlanningConsultations@scottishwater.co.uk

Scottish Water Disclaimer:

"It is important to note that the information on any such plan provided on Scottish Water's infrastructure, is for indicative purposes only and its accuracy cannot be relied upon. When the exact location and the nature of the infrastructure on the plan is a material requirement then you should undertake an appropriate site investigation to confirm its actual position in the ground and

to determine if it is suitable for its intended purpose. By using the plan you agree that Scottish Water will not be liable for any loss, damage or costs caused by relying upon it or from carrying out any such site investigation."

Supplementary Guidance

- Scottish Water asset plans can be obtained from our appointed asset plan providers:
 - Site Investigation Services (UK) Ltd
 - Tel: 0333 123 1223
 - Email: sw@sisplan.co.uk
 - www.sisplan.co.uk
- Scottish Water's current minimum level of service for water pressure is 1.0 bar or 10m head at the customer's boundary internal outlet. Any property which cannot be adequately serviced from the available pressure may require private pumping arrangements to be installed, subject to compliance with Water Byelaws. If the developer wishes to enquire about Scottish Water's procedure for checking the water pressure in the area, then they should write to the Development Operations department at the above address.
- If a connection to the public sewer and/or water main requires to be laid through land out-with public ownership, the developer must provide evidence of formal approval from the affected landowner(s) by way of a deed of servitude.
- Scottish Water may only vest new water or waste water infrastructure which is to be laid through land out with public ownership where a Deed of Servitude has been obtained in our favour by the developer.
- The developer should also be aware that Scottish Water requires land title to the area of land where a pumping station and/or a Sustainable Drainage System (SUDS) proposed to vest in Scottish Water is constructed.
- Please find information on how to submit application to Scottish Water at our Customer Portal.

Paul Wilson
Energy Consents Unit
The Scottish Government
5 Atlantic Quay
150 Broomielaw
Glasgow
G2 8LU

Your ref
ECU00006196:

Our ref:
GB01T19K05

Date:
05/08/2025

Paul.Wilson@gov.scot
econsents_admin@gov.scot

Dear Sirs,

ELECTRICITY ACT 1989

THE ELECTRICITY (APPLICATIONS FOR CONSENT) REGULATIONS 2017

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

With reference to your recent correspondence on the above development, we acknowledge receipt of the Scoping Report (SR) prepared by AECOM Limited in support of the above development.

This information has been passed to SYSTRA Limited for review in their capacity as Term Consultants to Transport Scotland – Roads Directorate. Based on the review undertaken, Transport Scotland would provide the following comments.

Proposed Development

The proposed development comprises multiple components, including increasing the operating voltage of existing overhead lines (referred to as 'uprating') from 275 to 400kV, the construction of a new 400kV overhead line as well as upgrades to existing substations. The components are as follows:

- The uprating of approximately 4 kilometres (km) of an existing overhead line (known as 'ZG route') between Denny North Substation and Bonnybridge Substation from 275 to 400kV;
- The construction of approximately 20km of new 400kV overhead line between Bonnybridge Substation and an existing overhead line (known as 'XX route') north of Glenmavis;
- The removal of approximately 11km of an existing 132kV overhead line (known as 'CB route') between Bonnybridge and Cumbernauld Substation;
- Undergrounding of two sections of an existing 132kV overhead line (known as 'AA route') between Bonnybridge and Bathgate, where it is crossed by the proposed new overhead line;

- The uprating of approximately 15km of an existing overhead line (known as 'XX route') between Easterhouse and Newarthill Substations from 275 to 400kV;
- The uprating of approximately 16km of an existing overhead line (known 'XR route') between Newarthill and Wishaw Substations from 275 to 400kV; and
- Works at the existing Denny North, Bonnybridge, Cumbernauld, Easterhouse and Wishaw Substations to facilitate the above overhead line works.

The proposal has the potential to impact several trunk roads, including the M876, M73 and M8.

Assessment of Environmental Impacts

Chapter 10 of the SR presents the proposed methodology for the assessment of Traffic and Transport. This states that the assessment will be carried out in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines entitled Environmental Assessment of Traffic and Movement (July 2023). These specify that road links should be taken forward for further assessment where the following two rules are breached:

- Rule 1: Include road links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
- Rule 2: Include road links of high sensitivity where traffic flows have increased by 10% or more.

Chapter 10 states that the Study Area for the assessment will be informed by the IEMA Guidelines and that this will be based on public roads that provide sub-regional and local access to the Project, and on which the impact of Project traffic may need to be considered in order to identify any potential environmental effects. Transport Scotland considers this approach appropriate and would add that the potential impact on any trunk roads proposed to be utilised for construction should be screened and assessed if the IEMA thresholds are exceeded.

We would also ask that methodology statements are provided for any proposed trunk road crossings in relation to overhead lines.

We note that traffic data on Study Area roads will be collected to inform the environmental assessments. We would add that an alternative source of traffic data is Traffic Scotland's National Traffic Data System.

We would also state that any proposed changes to the trunk road network must be discussed and approved (via a technical approval process) by the appropriate Area Manager.

Abnormal Loads Assessment

We note that Abnormal Indivisible Loads will be required during construction, and these are expected to travel from a port which has, not yet been identified. We note that a Preliminary Route Appraisal for the transport of any AILs from ports to site(s) will be prepared, including proposed routes, AIL vehicle types and axle loads, and vehicle swept paths for any obvious constraints. This is considered appropriate, and we would add that Transport Scotland will require to be satisfied that the size of loads proposed can negotiate the selected route and that their transportation will not have any detrimental effect on structures within the trunk road route path.

I trust that the above is satisfactory but should you wish to discuss any issues raised in greater detail, please do not hesitate to contact me or alternatively, Alan DeVenny at SYSTRA's Glasgow Office on 0141 343 9636.

Yours faithfully

Redacted

Iain Clement

**Transport Scotland
Roads Directorate**

cc Alan DeVenny – SYSTRA Ltd.

Paul Wilson
Case Officer
Energy Consents Unit
The Scottish Government

23 July 2025

ECU Planning Reference: ECU00006196; Denny to Wishaw Network Upgrade

Scottish Forestry Reference: D32-190 Denny to Wishaw Network Upgrade

Sent to: Paul.Wilson@gov.scot

Dear Paul,

ELECTRICITY ACT 1989
THE ELECTRICITY WORKS (ENVIRONMENTAL IMPACT ASSESSMENT) (SCOTLAND)
REGULATIONS 2017

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

Thank you for the opportunity to comment on this proposal.

Scottish Government policy is opposed to the permanent removal of woodland for the purposes of conversion to another land use in line with the Control of Woodland Removal Policy and the Climate Change Plan 2018-2032.

Scottish Forestry is the Scottish Government agency responsible for forestry policy, support and regulation.

The scoping documents indicate that existing forestry is likely to be impacted by the development.

In line with the United Kingdom Forestry Standard (UKFS), Scottish Forestry strongly encourages the development of a Forest Plan for all woodlands, especially those undergoing long-term operations like felling and restructuring.

The Forest Plan will be prepared in consultation with Scottish Forestry and will be subject to approval prior to any felling or construction activity.

The purpose of the plan is to set out clear objectives for biodiversity, timber production, recreation, and climate resilience.

The plan should provide a clear rationale for the timing and phasing of infrastructure felling and, separately, the management and ongoing felling and restructuring activities. Finally, under the Scottish Government's Control of Woodland Removal Policy, an explanation of arrangements for compensatory planting should be provided.

Infrastructure Felling:

Under the Forestry and Land Management (Scotland) Act 2018, felling trees without permission is an offence unless an exemption applies.

Felling must be:

- planned and licensed - all non-exempt felling requires a Felling Permission.
- Phased - to maintain forest structure, biodiversity, and public access.

Restocking Requirements

If felling is approved, restocking is typically required unless the land is being permanently converted for development.

Restocking must:

- Be completed within a specified timeframe.
- Use appropriate species and densities.
- Comply with the UK Forestry Standard (UKFS).

Enforcement

If restocking is not completed, Scottish Forestry may issue:

- A Restocking Direction.
- A Remedial Notice (enforceable under law).

Non-compliance can lead to prosecution or direct intervention by Scottish Ministers.

Compensatory Planting (CP)

Applies under the Control of Woodland Removal Policy.

Where woodland is identified for permanent removal, a commitment to undertake compensatory planting is required.

We recommend that the following is addressed explicitly within any planning consent under which woodland removal is being approved.

- A Compensatory Planting Plan (content subject to agreement with Scottish Forestry) is provided that details the area of permanent deforestation that will result from the development. This plan should clearly articulate how that area has been calculated.

The Compensatory Planting Plan must comply with the UK Forestry Standard and as a minimum include detail relating to species composition, design, cultivation and drainage, protection, deer management and ongoing maintenance requirements and monitoring.

- The area of land for which compensatory planting is proposed should be either under developer ownership or managed under a third party lease agreement of suitable timescale. This land should be capable of supporting woodland growth sufficient to result in the delivery of the required compensatory outcomes.

Any appointed clerk of works should have an ecological background and their remit should include the ongoing monitoring of the establishment of any compensatory planting.

I have reviewed the scoping document and note that the developer identifies forestry as being within scope for various phases of the development. I look forward to being able to review the forestry chapter of the EIA in due course. I would urge the developer to address the comments made above explicitly within the Forestry Chapter.

If you would like to discuss any of the points raised please do not hesitate to contact me.

Yours sincerely
Stewart Snape
Regulations and Development Manager