

Electricity Act 1989
Town & Country Planning (Scotland) Act 1997
DPEA Code of Practice

Tealing to Kintore OHL proposal TRL-120-1

CHS Statement: Need for the Project by Brian Wade

My name is Brian Wade, speaking on behalf of NOTKUP.

Our submission is that SSEN has failed to demonstrate a clear and specific need for the TKUP proposal in its current form.

I have written a 19 page paper on this topic which the Reporters have declined to exhibit on the DPEA website, or admit to the inquiry documentation. I find this both frustrating and extremely disappointing. The message is clear; the community's views do not seem to matter. In actual fact they are the most important of all, because we are the only people in this room who have to live with the consequences of a decision to grant consent for the line.

We do not dispute that Scotland requires investment in transmission infrastructure to support the transition to lower-carbon energy.

The issue is whether this particular project — a new 400 kV overhead line and associated substations across Aberdeenshire and Angus — has been shown to be necessary, proportionate, and the best available solution.

We say it has not.

SSEN repeatedly relies on National Development status under NPF4 and references to the Pathway to 2030 programme. But National Development status does not grant automatic consent for any individual project.

NPF4 itself makes clear that all relevant planning considerations still apply.

Importantly, Policy 11 also requires consideration of underground connections where possible.

That requirement has not been properly addressed.

A central concern is that the assumptions underpinning this project are changing rapidly.

Electricity demand forecasts used in earlier network planning were based on extremely optimistic assumptions about heat pump installation rates and electric vehicle uptake.

In reality, those targets are not being achieved.

At the same time, major offshore wind developers are delaying, reducing, or withdrawing projects because of supply chain pressures and financial uncertainty.

That raises serious questions about whether the very large increase in transmission capacity proposed by SSEN will actually be required within the claimed timescale.

There is also a fundamental issue about what NESO — formerly National Grid ESO — actually requested. FOI responses from NESO confirm that they identified a broad need for reinforcement between geographical boundaries.

However, they did not prescribe this specific technology, this route, or a brand-new line of pylons through Aberdeenshire. Those decisions were made by SSEN.

Indeed, the original Pathway to 2030 and Holistic Network Design documents referred primarily to upgrading existing infrastructure.

They did not specify the entirely new overhead line now being proposed. That distinction is extremely important.

The public has repeatedly been told that this project is effectively mandated by national policy.

But the evidence shows that the detailed design choices are SSEN's own.

We are also concerned that the project appears significantly over-engineered.

SSEN proposes infrastructure capable of around 6 GW transmission capacity, despite acknowledging that expected operating levels are likely to be much lower.

At the same time, existing lines are already being upgraded.

No convincing explanation has been provided as to why lower-impact alternatives — including upgrading existing infrastructure further, reconductoring, subsea HVDC, or underground HVDC — were not fully and transparently assessed.

This matters because the cheapest option for the developer is not necessarily the best option for consumers or communities.

Overhead lines may have lower initial capital costs, but they also create major landscape, environmental, and community impacts.

Long-distance transmission from north-east Scotland to England is precisely the type of situation where modern HVDC technology is increasingly used internationally.

Countries such as Germany and the Netherlands are moving toward underground and offshore solutions for precisely these reasons.

There is also an important question of regulatory incentives.

SSEN receives guaranteed returns on transmission infrastructure funded through consumer bills.

As both a generation and transmission company, it benefits commercially from building additional infrastructure.

That creates a clear need for particularly rigorous scrutiny of whether the scale and form of this project are genuinely justified.

Finally, we are concerned by what has become a piecemeal or “salami-sliced” approach to grid expansion.

Major strategic questions about environmental impacts, cumulative impacts, technology choice, and long-distance transmission strategy are being considered through multiple separate applications rather than through one genuinely holistic national assessment.

Our submission is therefore straightforward.

SSEN has demonstrated a desire to build this project, but not a compelling need for it in this form.

Before consent is granted, there should be a transparent comparison of alternatives, a realistic reassessment of future supply and demand assumptions, and proper consideration of solutions with lower environmental and community impacts.

Brian Wade

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