

Electricity Act 1989

Town & Country Planning (Scotland) Act 1997

DPEA Code of Practice

TEALING TO KINTORE OHL ref TRL-120-1

COMMUNITY HEARING STATEMENT BY EILEEN WEST on TRAFFIC AND TRANSPORT

INTRODUCTION

My name is Eileen West. This statement is about Traffic and Transport issues raised by my Community in relation to the OHL project. I wish to refer to my 22 page paper on Traffic, Roads and Transport which the Reporters have declined to admit to the Inquiry or exhibit on the DPEA website. This is disappointing as it indicates that the community's knowledge does not matter. It is also bewildering as it should be the most important. It is those in the Community who are the only people in this room who will have to live with the consequences of the recommendation made as a result of this process.

I'll attempt to condense my submission on Traffic, Roads and Transport into the allotted time. In particular the profound policy failures at its heart and the grave harm it would inflict on historic Couper's Road.

It is remarkable that there is no dedicated Inquiry session on Traffic and Transport given how weak and incomplete the Applicant's case is in this area. This is not a peripheral matter and goes to the heart of whether this proposal is policy-compliant, evidence-based and safe. In this area, it is none of those things.

POLICY

In its present form, TKUP fails the key requirements of National Planning Framework 4.

Policy 18, Infrastructure First, requires development to protect existing infrastructure. Policy 13 requires that development must not have an unacceptable impact on the safety and function of the transport network and that it must support safe, sustainable movement for all users, especially the most vulnerable ... walkers, cyclists, horse riders, children, older people and disabled people.

Those are not optional considerations. They are policy tests. And this proposal does not meet them.

SSEN reduces rural roads to lines on a map and access routes. But that is not what our roads are. They connect the fabric of community life. They are the roads people walk,

cycle, ride, accompany children, meet neighbours and move through daily life. In many places there is no pavement, no separation and no ALTERNATIVE. To treat those roads as construction access routes for major industrial works is fundamentally at odds with the policy protections that NPF4 is supposed to guarantee.

NO PLAN AVAILABLE

It is astonishing that at this late stage there is no final, detailed Construction Traffic Management Plan before this Inquiry. There is no route-specific evidence on traffic numbers, timing, bridge capacity or safety impacts and no robust mechanism to ensure contractors comply with routing restrictions, reduced speeds or road safety requirements.

A lack of enforceable framework should give this Inquiry no confidence that these crucial measures will be honoured in practice. It's a fundamental failure.

That failure matters because assurances are not evidence. Promises are not protection. And goodwill is not a safety system.

A child on a country road is not protected by vague assurances and a future intention. A cyclist is not protected from HGVs with a desktop outline commitment. A horse rider is not protected by a contractor protocol in a file. If safeguards are deferred until after consent then what is being asked of this Inquiry is not informed approval but BLIND FAITH.

COUPER'S ROAD

And nowhere is this more disturbing than on Couper's Road.

It is of deep historical significance - a surviving drovers' route linked to the Cryne Mounth and to the movement of cattle, goods and people between Deeside, Angus and further south. Its course is marked in Roy's Military Survey, in early county maps, and in the first edition Ordnance Survey. But its true significance lies not only in records. It lives in the road itself ... the thin ribbon of its course, its dry-stone dykes, its mature trees and its enduring relationship with the landscape through which it passes.

That historic character has survived because the road is shaped by history not engineered for industrial convenience and corporate profit.

Road widening. Elongated line-of-sight lay-bys. Relentless construction traffic and heavy machinery for 5 years. Felling of familiar and loved ancient trees ... will transform a quiet historic route into a utilitarian access road for major infrastructure works.

That is not improvement. It is obliteration and irreversible harm.

Despite what SSEN claim, "ancient" trees cannot be replaced once felled other than by a time machine. Once a historic road is widened and stripped of its intimate rural

character, it can't be recovered. Once this landscape is altered, no condition, no promise, and no compensatory planting - 50 miles away in another shire - can undo what has been lost.

And the harm does not end there. There are grave concerns about drainage, root damage, sediment run-off, nearby National and Local designated wet woodland, the Loch of Park SSSI, where famously George Washington Wilson developed stereo photography, the LNCS, groundwater springs, and the setting of historic features such as Sir Robert the Bruce's 700 year old King's Well. Yet again, the impacts are minimised, the evidence incomplete and any confidence expected from the public in SSEN entirely misplaced.

SUMMARY

This Inquiry turns on three simple matters: policy, evidence and trust.

On policy, the proposal fails to protect vulnerable road users and fails to safeguard existing infrastructure, contrary to NPF4 Policies 13 and 18.

On evidence, the absence of a final, detailed and publicly scrutinised CTMP means this Inquiry is being asked to consent to risk before the protections have even been defined.

And on trust, communities are being asked, once again, to accept that all will be well later despite ample repeated experience that once consent is granted, the burden of harm falls not on the developer, but on the people who live there.

That is unacceptable and neither fair nor lawful planning.

For those reasons, this proposal should not be consented in its current form. At the very least, it must be refused unless and until there is a fully evidenced, legally binding Traffic Management Plan and an alternative solution that avoids irreversible harm to vulnerable users, to Couper's Road, and to the ancient trees and historic landscape that give this place its meaning.

Eileen West

12 May 2026