

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

Tealing to Kintore OHL proposal TRL-120-1

CHS Statement: Cultural Heritage Impacts by Karen Nichols

My name is Karen Nichols. I live near Brechin and have a background in Scottish history, planning, heritage tourism, and archaeological research. I wish to speak about the cultural heritage impacts of the Tealing to Kintore Upgrade Project.

The starting point in Scotland is clear. National Planning Framework 4 states that development should preserve and enhance historic assets where possible and avoid or mitigate significant adverse impacts on their integrity and setting.

My concern is that, throughout this application, cultural heritage has been treated as a procedural exercise rather than something genuinely valued and protected.

Chapter 10 of the application lists many heritage assets, but there is little meaningful analysis of how the proposed pylons and cables would affect their setting, character, or visitor experience. Assertions are repeatedly made that impacts are “acceptable” or “not significant,” but there is often no explanation of how those conclusions were reached.

Historic Environment Scotland’s own guidance makes clear that setting is not just about visibility. It includes landscape context, views, relationships between sites, atmosphere, and sense of place.

That matters greatly in this landscape.

One important example is the Brown and White Caterthuns near Brechin and Edzell. These Iron Age hill forts are among the best preserved in Scotland and are nationally important culturally, archaeologically, and as visitor destinations. Their significance lies not only in the monuments themselves, but in their open setting, their relationship to the wider landscape, and the experience visitors have when walking there.

The proposed line would introduce very large pylons and overhead cables into views to and from these sites. In my opinion, that would fundamentally alter the experience of the landscape and diminish the integrity of the setting.

There is also concern about cumulative impact. Historic sites in this region do not exist in isolation. They form connected cultural landscapes. Yet the application often considers sites individually rather than assessing the combined effect across the wider historic environment.

A second major concern is accountability.

The Environmental Impact Assessment repeatedly refers readers to future management plans, contractor procedures, and mitigation documents that do not yet exist.

When I asked SSEN whether these contractor management plans and written schemes of investigation could be viewed, I was told they would only be developed after consent is granted.

That means the public is effectively being asked to trust that important protections for archaeology and heritage will be dealt with later, behind closed doors, by contractors and consultees.

That is not a transparent process.

I am also concerned about what may be lost during construction itself. This landscape contains not only known sites, but potentially undiscovered archaeology, military remains, and even human remains.

As someone with archaeological field experience, I know how subtle important evidence can be. A Roman feature, a prehistoric boundary, or burial evidence may be almost invisible except to trained specialists. Once disturbed by heavy machinery, that evidence is gone forever.

Yet consultation staff themselves appeared unaware of some of the legal protections surrounding historical discoveries, including military aircraft remains legislation.

This raises real concerns about how effectively cultural heritage protections would operate in practice on such a large construction project.

Scotland's historic environment is not a luxury. It is part of our national identity, our tourism economy, and our shared inheritance. In 2024, Scotland welcomed millions of visitors attracted largely by our landscapes and heritage.

The question for the Inquiry is not whether infrastructure is needed. The question is whether this proposal has demonstrated that it properly understands, respects, and protects the historic environment in accordance with Scottish policy and legislation.

In my view, it has not.

Karen Nichols

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