

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

Tealing to Kintore OHL proposal TRL-120-1

CHS Statement: Need, Design, Planning and Choice by Graham Sutherland

### Submission to the TKUP OHL Public Local Inquiry

I am Graham Sutherland. I am an Oil and Gas Engineer.

Over 11,000 residents formally opposed the SSEN Kintore-to-Tealing OHL proposal. In November, they were joined by 26 Angus Councillors who, having listened for a full day to every argument, voted with a unanimous voice to reject this scheme. Their verdict was clear: this project offers Angus no benefit, only downside. They branded it an “act of vandalism on a colossal scale” and a total failure of the “just transition” promised to our rural communities by the Government and the developer.

We are told by SSEN that this is a project of “national importance.” While a fit-for-purpose grid is undeniably vital in this electrical age, we must ask: how did we get here, and why must Angus pay the price for decades of corporate and regulatory failure?

The crisis we face today is not an act of God; it is a crisis of design. Since the privatisation of the energy sector in 1989, the grid has been treated as a cash cow rather than a critical national asset. To date, the three major network owners—SSE, Scottish Power, and National Grid—have returned approximately **£80 billion** to their shareholders.

While those billions flowed out of the country, investment in the grid stayed stagnant. By the end of 2012, Scotland already had 331 operational wind farms producing nearly 6 gigawatts of power. Yet, the grid was not upgraded. Why? Because of a “staggering lack of urgency.” Between 2012 and 2014, Ofgem’s “Least Regret” policy actively blocked critical infrastructure, like the Kintore 400kV substation, simply to protect short-term balance sheets.

They gambled on a “cautious approach,” and they lost. Today, the British public is paying the price through a £1.7 billion and rising annual burden in constraint payments—money paid to generators to literally *turn off* because the grid cannot move the power. This failure is predicted to spiral to £8 billion by 2030.

Suddenly, after a decade of doing nothing, there is a frantic rush. Under Ofgem’s 2022 framework, the mantra is now to build as much as possible, as fast as possible—provided it is cheap. This is why we are being forced to accept 19th-century overhead line technology and massive AIS substations.

Let us be clear about the incentives: SSEN is a natural monopoly. They advised residents at consultations that they *want* as much transmission infrastructure as possible. Why? Because

they are paid for every mile of it. Once built, these pylons become assets on their balance sheet, guaranteed to generate a level of profit for their shareholders, while the consumer pays for the construction and the lifelong maintenance.

The proposed mid-point substation at Hurlie is a prime example of unnecessary industrialisation. Originally slated for Fiddes, it was moved only after a public outcry over its proximity to the home of Lewis Grassie Gibbon. This substation exists largely to accommodate small ScotWind projects—generation that could easily be integrated into adjacent offshore networks.

Meanwhile, the major players—Berwick Bank, NnG, and Inch Cape—are already planning to send their energy south. Even SSER's Ossian project has shifted its design. After originally planning to undersea three cables to Lincolnshire and following recent discussions with NESO and SSEN, they now intend to land all three undersea cables near Angus. They are following the Seagreen model: subsea and undergrounded.

However, Seagreen also highlights the current absurdity. In January, reports revealed that 77% of Seagreen's output was wasted last year due to grid bottlenecks estimated to have cost £200 million in constraint payments to SSE. SSEN's answer to this waste is to march a line of steel towers through our landscape. Our answer is that if the generation is offshore, the transmission should be offshore too.

Finally, we must address the reality of 2026. The world is far more unstable than it was when the Holistic Network Design was drafted in 2022. Recent conflicts in Ukraine and the Middle East have proven that aggressors target electrical infrastructure first.

Overhead lines are "sitting ducks." They are exposed, easily mapped, and vulnerable to disruptive operations. Our European neighbours—Germany, Denmark, Estonia, Greece - and also Israel—have recognised this. They are investing heavily in underground and subsea cables, not just for aesthetics, but for national resilience.

We are told we must accept these pylons for the "greater good." But there is no "good" in repeating the mistakes of the past. We should not be subsidising a private monopoly's balance sheet with our landscape and our security.

If this grid is truly of national importance, it deserves a national-standard solution: **subsea and underground**. It is time for the regulators and SSEN to stop choosing the cheapest option for their shareholders and start choosing the safest, most resilient option for the people of Scotland.

I urge the Inquiry to listen to the 11,000 voices, the 26 councillors, and the clear evidence of history. Reject this act of industrial vandalism.

Graham Sutherland

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