ELECTRICITY ACT 1989
TOWN AND COUNTRY PLANNING (SCOTLAND) ACT 1997
DPEA CODE OF PRACTICE FOR ELECTRICITY ACT INQUIRIES

TEALING TO KINTORE UPGRADE PROJECT (TKUP) TRL-120-1
SOCIO-ECONOMICS by ALAN CHESTERMAN

Submission to the Public Inquiry into the SSEN Proposed TKUP 400 KV Overhead Transmission Line

1 Summary and Introduction

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This submission on the Socioeconomics of the TKUP is prepared on behalf of the campaign groups across the communities along the length of the proposal.

As well as analysing the socio-economics report by Biggar Economics ("Biggar report") for SSEN in the application for the TKUP 400 KV Overhead Transmission Line ("the OHL" or "the Proposal")), this submission considers the wider economics of the proposal and its justification for clean energy and Net Zero objectives. It analyses the benefits from project spend, and presents wider socio-economic analyses of the need for and justification of the OHL, and project development to assure the proposal meets the brief and delivers best economics and value against the key objectives.

SSEN asserts that expanding renewable capacity needs urgent transfer to meet rapidly rising demand to justify the Proposal, citing only policy targets and aspirational objectives in support. Renewable capacity is expanding, but how much is actually required for transfer is unclear. Rather than rapidly rising, demand has fallen since 2005 by 29%. Future rapid demand increase is unlikely.

SSEN gives no evidence of implementing good project development practice. Well-bounded data on capacity and demand essential to design and size the OHL will not be available until the NESO

Spatial Energy Plan is complete. Without this data, the proposal is based on guesswork, cannot be developed using good practice, and SSEN cannot assure best economics and cost effectiveness. Assertions and policy targets are insufficient evidence. The proposal is premature and unjustified.

The Biggar report shows speculative economic benefits from project spend in the best possible light and downplays all the negative impacts of the proposal. However, regional benefit, if any, is modest, low value, with few jobs thinly spread along the corridor. The report asserts insignificant disruption to local tourism, but gives scant factual evidence of this, ignoring important aspects including cumulative effects, landscape and visual impacts from far larger pylons and lines than other UK OHLs. When these omissions are weighed, there is serious risk of significant harm to tourism. One of the worst impacts for local people, namely depression of house prices is dismissed. Cumulative negative impacts are substantial, far outweigh modest benefits, and, for communities close to the route, overwhelming.

Based on our evidence, the Proposal is not ready to consider, let alone to consent. It should be deferred until project development has been reworked using key design data when available. This should include evaluating alternative options, not prejudging an OHL, as required by Treasury Green Book rules, and defining the selected concept including rightsizing capacity for cost-effectiveness. The results should be discussed with the stakeholders, including local communities, who have a right to be consulted and listened to throughout development, to ensure negative impacts are identified and addressed.

2 Assessment of benefits from project spend and wider Net Zero benefits

The Biggar report focuses on benefits from direct spend on the OHL. As well as assessing this this submission takes a wider socio-economic view to assure the proposal would deliver value, meet the brief, assessing need, justification, and project development to assure delivery of Net Zero objectives while avoiding or mitigating negative impacts.

2.1 Premature, and immature, project development

The Scottish Government set ambitious renewable generation targets, let the market choose where to put wind farms, and encouraged their construction, without considering grid infrastructure. Connecting dispersed, remote wind brings major grid implications, and drives the need for grid expansion to meet medium and long demand needs. Urgency to expand the grid is in strong tension with uncertainties in need, amount, location, timing of new renewable capacity, and development of demand. Haste to plough ahead with ill-considered, premature projects is likely to result in considerable waste.

To *maximise economic value* (one of NPF 4's ambitions), good project practice requires implementing established project development processes to show that a project meets the brief, delivers expected benefits and value, is cost-effective, and justifies approval. Cost is important but not the only or deciding factor. This involves setting and agreeing objectives with the stakeholders, screening available options, selecting the most appropriate concept, and insisting on project definition to work out details and prepare for successful execution to deliver the brief at expected cost and schedule. The process satisfies stakeholder needs; the UK Treasury "Green Book" requires alternative options to be evaluated; Clean Power 2030 requires cost-effectiveness, achieved by "right-sizing" and other measures. The process requires well-bounded design data in order to be meaningful. The stakeholders are engaged throughout.

2.2 The reality

There is no evidence of a thorough project development process to assure value and delivery behind this proposal. The brief is woolly, with high uncertainty in the range of capacity and demand data crucial to deliver value from clean energy and Net Zero benefits. TKUP was a pre-existing proposal to *upgrade* the existing OHL; when potential need to increase transfer capacity emerged, it became a new OHL with exceptionally large pylons. Competing with, and impacting on, other land users, affecting communities, tourism, house prices, it was always likely to meet opposition.

As well as the loose brief, it is unclear what objectives and key success factors were set and agreed. Well-confined capacity and demand data are not yet available; the proposal seems to offer capacity rather than provide what is actually needed. Without key data and agreed objectives, meaningful project development and value assurance is impossible, and success is not defined.

Thorough project development is a pre-requisite to consent major investment proposals. Without documented evidence, and a well-confined brief, better options may be missed, the project may be poorly defined, over or under-sized, fail to deliver, overrun cost and schedule, at worst not needed. The proposal is premature, not ready to consider, let along consent. It should be shelved until key design data is available to rework and complete a thorough project development process.

2.3 Scottish renewable capacity and electricity demand required are overstated

The Biggar report cites Scottish and UK Net Zero targets, UK demand increase, and the NESO Pathway to 2030 as all driving need, justify approval of the proposal, painting a picture of rapid growth in Scottish renewable capacity and demand. This neither reflects history, nor realism:

1. Since 2005 overall UK demand has been falling (1); future demand is uncertain
2. The location and scale of UK renewable energy capacity is uncertain
3. The NESO connections review (2) culled new proposals by prioritising shovel ready projects, reducing new capacity to that ready for connection

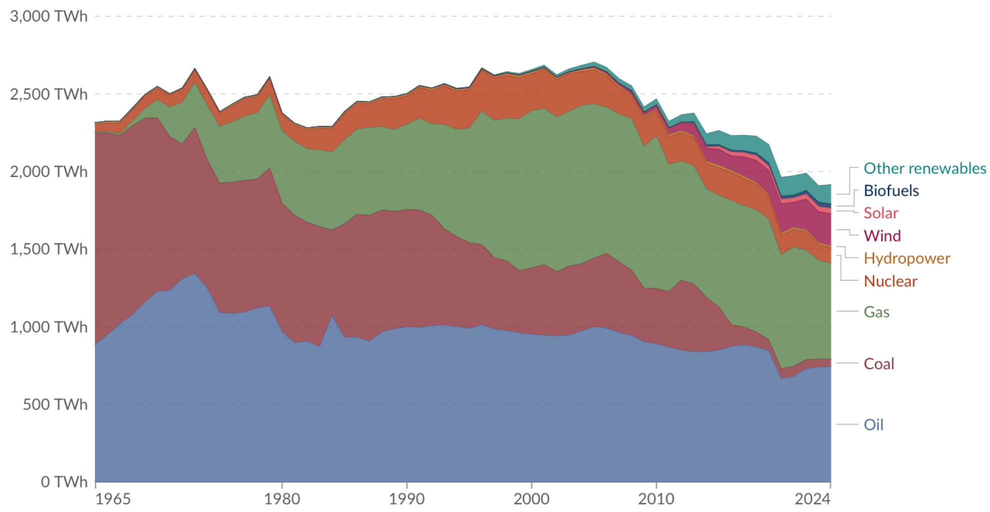


Figure 1: UK energy consumption by source, 1965 – 2024 (1)

Figure 1 shows UK demand declined since 2005 by 29%, reflecting declining industrial demand due to deindustrialisation far outpacing demand increase due to electrification.

Deindustrialisation is driven by UK electricity prices among the highest in the developed world. Prices will continue to increase due to complexity of electricity supply and transition costs; there is no coherent plan to reduce prices significantly. Realistically, further deindustrialisation is likely.

Slower than expected demand increase from electrification reflects unrealistic forecasts of rapid uptake of EVs and heat pumps, failing to reflect delivery realities. Heat pumps and EVs are expensive, uptake is hindered by cost of living and unaffordability; EV uptake is slowed by user scepticism, lack of charging infrastructure; heat pumps are unsuited to many homes, resources are in short supply. As these barriers remain, a step change in the pace of electrification is unlikely.

Future demand will reflect the balance of growth from electrification and demand from data centres, set against decline due to deindustrialisation. Sheer complexity makes forecasting demand highly uncertain, however rapid increase in the near to medium term, seems unlikely. If demand grows, it is more likely there will be time to respond, rather than urgency for pre-emptive action.

Assessment of renewable capacity, demand, and need is required to weigh all relevant factors and forecast needs for this infrastructure. The NESO strategic spatial energy planning (SSEP) (3), NESO connections review (2) and DESNZ Onshore Wind Taskforce Strategy (4) address this.

3 NESO strategic spatial energy planning (SSEP)

The SSEP (3) is intended to give a clearer picture of the future energy system, providing a pathway for electricity and locations, capacities, and timings optimised for cost across demand and high-level network needs. It will take public views, environmental concerns, how different industries use land and sea, into account. The first SSEP will be a GB-wide plan, mapping potential zonal locations, quantities and types of electricity and storage, by 2027. For this proposal, the SSEP plan will provide a better defined picture of wind capacity and demand requirements and locations.

4 NESO connections reform (2,5)

This reform reduced the connections queue in Northern Scotland from > 3 GW of onshore wind capacity, by prioritising fewer, shovel ready, projects. Refer to Appendix 1. The reform states *"Across some parts of Great Britain, there's a shortfall in onshore wind power for 2035; England and Wales especially need more wind projects, while Scotland is already above its target."* "In the next round of applications to connect to the grid, only wind projects in Scotland that have special protections … will be allowed to move forward. England and Wales will be open for new "ready" wind projects to help fill the gap." "No new onshore capacity in Scotland is permitted in Phase 2 (2035)."

The reform results identify new onshore wind capacity requirements, c. 1.5 GW for Phase 1 (2030) for zone D1 (N Scotland); 924.2 MW of capacity from protected onshore wind projects. These are modest requirements and major onshore wind capacity reduction versus the previous queue.

5 DESNZ Onshore Wind Taskforce Strategy (4)

This calls for an increase in GB onshore capacity from ~ 15 GW to ~ 27-29 GW by 2030 from England, Wales and Scotland. Actions to strengthen deployment in England and Wales, along with lifting the ban on onshore wind in England, and putting large onshore into the Nationally Significant Infrastructure Project regime enable a growing pipeline of projects in England. Scottish onshore wind pipeline is not emphasised, standing out by its absence. Taken along with the connections reform cull of Scottish onshore projects, there is a consistent theme of less new onshore wind in Scotland.

6 Clean Power 2030 – Core elements of a clean power system (6,7)

The Clean Power 2030 plan, CP 2030 (6) is put forward to support the proposal. It states, to decarbonise the power sector by 2030, 27 to 29GW of onshore wind will be needed within GB, a major increase above current built capacity, 14.8 GW. Section 2.4 of the Annex 2 Networks connections and access analysis (7) identifies critical network projects required for CP 2030. The OHL – this Proposal - is not listed.

Section 2.5.1 (7) lists works to enable offshore wind power. These vary between NESO pathways, "*Further Flex and Renewables*", and "*New Dispatch*,". TKUP is listed as enabling the former, not the latter, meaning if New Dispatch is followed, investment in the TKUP is wasted, reflecting uncertainty in the CP plan and pathway until capacity and demand unfold. To avoid waste it would be wise to wait until the first SSEP plan is complete before considering consenting the proposal.

The SSEP transparency update (8) states NESO is "*Considering the Scottish Government offshore wind policy ambition of up to 40 GW of new offshore wind capacity by 2040*." It is premature to consent this proposal to enable Scottish offshore wind power until Scottish offshore wind capacity is clear. If the proposal needs to transmit offshore power, It must know how much.

As Scottish offshore wind power goes to meet demand in England, transmission via the Scottish grid is not necessary. The power should be transmitted by offshore cable. This is preferable to avoid both the impacts of the TKUP, and potential knock-on bottlenecks in the downstream onshore grid.

7 Implications for the OHL proposal

- the above information does not bear out the assertions that Scottish renewables targets and increasing capacity drive urgent need to increase north-south transfer capacity via this proposal
- Scotland is above target for onshore wind; urgency for more capacity is in England and Wales; post NESO connections reform, less new Scottish capacity is needed, protected capacity is modest.
- DESNZ onshore wind policy also emphasises more onshore wind in England and Wales, the Scottish onshore pipeline is not emphasised, a consistent theme with connections reform
- Scottish wind capacity requiring transport, and downstream demand, both essential to justify and size the proposal, are uncertain. As-is the proposal is selected and designed on guesswork.
- CP 2030 does not require this proposal to deliver onshore wind.
- CP 2030 cites two to clean power pathways, “Further Flex and Renewables”, and “New Dispatch”. TKUP is in the list of network projects to enable offshore wind for Further Flex and Renewables, but does not enable offshore wind in New Dispatch.
- until NESO completes the first GB spatial energy plan, selects the clean energy pathway, capacity and demand data is too uncertain to thoroughly develop a proposal to increase transfer capacity.
- the proposal is developed in accordance with good project value assurance practice; this cannot be done until capacity and demand data is better known; without assurance, the proposal carries high risk of waste, other negative impact, at worst may be unnecessary.
- until NESO concludes on required Scottish offshore wind capacity, providing capacity for this in the proposal is premature.
- Clean Power 2030 calls for the proposal to enable offshore wind, but as this is for export to England, it does not need to pass via the Scottish grid, and should be transmitted offshore.

The above is all fundamental to the purpose and design of the proposal, and lays out the high degree of uncertainty currently lying behind the brief driving it. Presently it is unclear if the proposal is the right solution, right sized for need. The proposal is premature and should not be consented.

These uncertainties are so large that they point to waiting for the data unfold before reworking project development using tighter capacity and demand data, and only then propsin this or a different project. Data will only be available to start this when the first SSEP plan is complete in 2027.

8 Cost-benefit analysis of the proposal

8.1 Value to the transmission system, Scottish, UK and Net Zero targets

There is no evidence of thorough project development to assure best economic value. Doing the right project, doing it right are more important than modest value from project spend. The logical decision is to pause until essential design data on capacity and demand are known. To proceed without good data and diligent project development risks major value destruction out of kilter with any benefits.

8.2 Benefits from project spend and comments on the Biggar Report

Full comments on the entire Biggar report are given in Appendix 2.

The report claims value from project spend could be ~ £200 million and 2000 job years across Scotland; £20 million and 200 job years in the Region area. Most of the value is in construction. The OHL could provide a few sustainable jobs and small business income in the Region; far fewer benefits would arise in the corridor close to OHL suffering the main impacts. The welfare fund and target for 200 homes are spread across SSEN's project portfolio; while welcome, the benefits are modest; regional and local impact would be minimal. Overall sustainable benefits would mean little to the region, even less to communities close to the line.

8.3 Housing impact

Among the most concerning impacts to local people is reduction in property values of close to the OHL due to negative buyer perceptions by buyers. Biggar asserts no evidence of price impact based on a report on a different region. Evidence of impacts while the OHL is in planning is given in Appendix 3. Greater impacts are likely post build.

8.4 Tourism impact

The Biggar report asserts the OHL will not significantly disrupt local tourism or reduce visitor numbers, passing off impacts as minor or affecting too few people. The OHL will have little impact in built cities, screened, remote; along the corridor, scant evidence is given to support the conclusion.

Much of the "evidence" is assertion and opinion from various aspects of tourism looked at individually, some dismissed as insignificant as relatively few visitors or businesses directly impacted.

The report cites other OHLs where visitor impacts are said to be low; claiming the same conclusions for this OHL, ignoring that the pylons are twice the size, with far greater visual impacts on visitors. The report ignores interaction of different impacts on different businesses and visitors, cumulative impacts resulting from interactions, visitor impacts when OHL is experienced as a whole; cumulative landscape impact all along the line on visitor perceptions, resulting reputational impact that could deter visitors who come for unspoiled landscapes.

The report consistently asserts and opines to dismiss and downplay overall impact; but when all the things ignored - cumulative effects, cumulative landscape impact of huge pylons and lines – are weighed, there is serious risk the OHL would cause significant harm to tourism.

8.5 Cost-benefit analysis

Economic value for Net Zero: The proposal is not justified. With no evidence of urgent need, there is good reason to wait for essential data. Key value drivers to ensure value; project development, key capacity and demand data are unavailable. Absent good data, the brief is unclear; the OHL may not be the right project; definition is poor, the line cannot be rightsized; wider objectives are not agreed. The project is premature, does not assure best value, carries high risk of waste, may not be needed.

Secondary value deriving from project spend: regional value in sustainable jobs and businesses is low; local value to communities living close to the OHL is lower still

Negative impacts and costs: serious visual and other negative impacts on communities; evidence of impact on property values close to the OHL. Significant risk of harm to tourism.

Cost benefit of local spend: small sustainable benefits from regional and local spend. Costs and negative impacts – other than in the cities and more remote towns, major visual impacts, risk of significant harm to tourism, far outweigh modest benefits. To communities close to the route of the OHL, where property values are impacted, smaller benefits and overwhelming negative impacts.

9 Overall conclusions

After factoring realism and uncertainty to demand, clear, present need for the proposal and value assurance for Net Zero is not demonstrated. The Biggar report shows modest benefits from project spend in the best possible light while downplaying the negative impacts. The cost-benefit from project spend itself is negative. The far bigger issue is ill defined need case and lack of value assurance. The proposal is not justified, not a good proposition. Before any new proposal is considered:

- thorough project development must be completed. Work should start when the NESO spatial energy plan, which provides the key design data, and realistic assessment of demand, is available

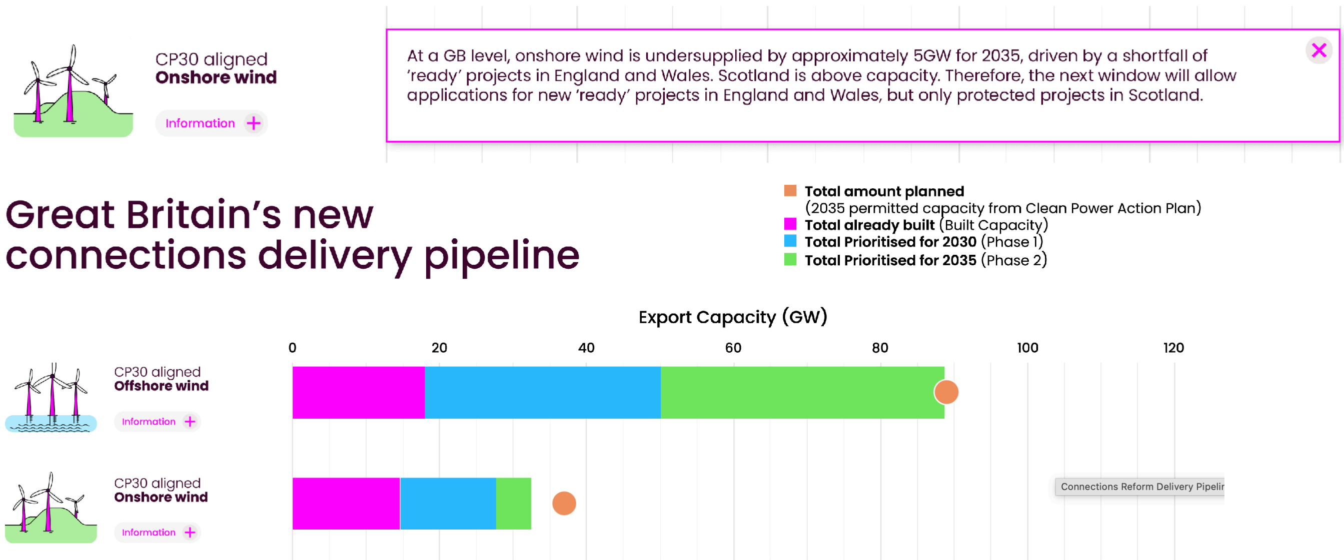
- concept selection to evaluate alternatives (not prejudging the outcome is an OHL), using data from the spatial plan, connections review, and realistic demand is complete and has been shared and discussed with the stakeholders, including affected communities
- definition work to define and right size the project and its objectives is complete, has been discussed with, objectives agreed with, the stakeholders, including affected communities

APPENDICES

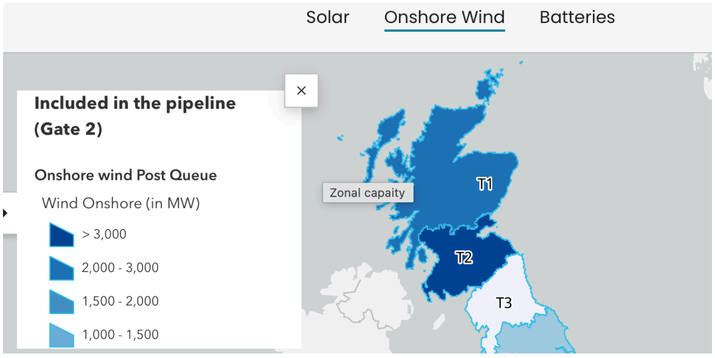
1. NESO Connections Reform Results

The connections reform results report (3) includes graphics of GB's new connections delivery pipeline results showing offshore and onshore wind capacity already built and new capacity prioritised for 2030 and 2035.

The "information window" states "At a GB level, onshore wind is undersupplied by approximately 5GW for 2035, driven by a shortfall of 'ready' projects in England and Wales. Scotland is above capacity. Therefore, the next window will allow applications for new 'ready' projects in England and Wales, but only protected projects in Scotland."



The section on onshore wind further down the reform report states “Across some parts of Great Britain, there’s a shortfall in onshore wind power for 2035, meaning not enough wind projects are planned to meet the targets. England and Wales especially need more wind projects, while Scotland is already above its target.” “In the next round of applications to connect to the grid, only wind projects in Scotland that have special protections (like planning permission) will be allowed to move forward. England and Wales will be open for new “ready” wind projects to help fill the gap.” and “The zonal system helps direct new projects to the areas that need them most.” The graphic, extract below, shows in Zone T1, connections reform reduced capacity from > 3,000 MW, to 1,500 – 2,000 MW post queue. These volumes are spread across Northern Scotland.



The extract below from the detailed results data, Reference 4, shows 924.2 MW of capacity from onshore wind projects in zone D1 is protected in Phase 1 (2030). No capacity is protected in Phase 2.

Table 11: Phase 1 MW volumes of protected projects for battery, onshore wind and solar by Distribution zone – final and zonal totals

Phase 1 (Phase 1 Zones)	D1	D2	D3	D4	D5	D6	D7	D8	Grand Total
Battery	1,919.3	1,390.2	737.5	980.6	65.0	2,551.5	818.3	1,773.5	**10,235.9**
Onshore Wind	924.2	379.6	10.2	0.0	65.2	230.1	0.0	0.0	**1,609.3**

2. Comments on the Biggar Report

Section 3

- Benefits estimated are Regional, not local to the OHL corridor, and are inherently uncertain.
- Actual benefits to the Region and Scotland may be far less than estimated.
- Most Regional employment and GVA generated will not flow to communities along the OHL.

- No evidence given of significant GVA and jobs to benefit of local communities along the OHL.
- No evidence is given of local economic growth or local project content along the OHL corridor or the Region. Whether the developers and stakeholders aim for high local content, or actually deliver high local content and local economic growth are both open to question.
- Guidance to help developer maximise local benefits relates to onshore wind farm construction, not HV transmission. There may be overlap but most contractors and machinery are different.
- No evidence is given of local economic growth or local project content along the corridor
- Whether there is a case to adopt good practice and that grid projects have a responsibility to contribute does not mean either will happen and make any significant contribution to local and regional economies. The words are meaningless do not evidence any local benefit
- Words about the good practice guide do not evidence any local benefit; no evidence is given of any primary contractors & businesses in the local corridor close to the line
- Words about deriving immediate benefits to the local supply chain do not evidence future benefits
- Apprentices will be few at best - the project will need skills now not in the future.
- In the affected corridor, the OHL is a one off. Few if any local apprentice jobs are likely.
- Whether in the core or ambition scenario, no evidence is presented of local benefit along the corridor and as there are no primary contractors & businesses close to the OHL, few if any local contracts and jobs will arise.

Section 4

- No evidence is given to quantify local benefit from Inclusive Ownership or local spending.
- Other than from the CBF itself, it is hard to imagine local communities deriving much if benefit. The OHL is very similar to existing transmission systems but larger, and local jobs and contracts for existing transmission are few in number and low local value.
- From existing data, SSEN is requested to set out how many new Region and local jobs, contracts and how contract value will be generated when the new OHL is operational
- SSEN aims for 200 houses in total. The number along the corridor and in the Region for this project is not given.
- The main issue for local communities is the impact on house prices relatively close to the OHL, which for the owners far outweighs positive benefits of local housing.
- Suggesting an opportunity to develop CWB gives no evidence to quantify local benefit.
- Local jobs and contracts for existing transmission are few in number and of low local value. No evidence is given to suggest a larger OHL will substantially increase local value
- If approved, the fact that the OHL is imposed on local communities is likely to reduce the already low score that local residents give for influence over local decisions

- The OHL is unlikely to make much difference to local suppliers and well-qualified local jobs along the corridor, as local jobs and contracts are likely to be few in number and low local value. No evidence is given to suggest otherwise.

UK Strategic Context

- A Just Transition in the Region is mainly assertion. Evidence to quantify it is limited. Region jobs in renewables are small (whole UK ~ 20,000) vs ~ 94,000 oil and gas jobs (9).
- The OHL will create construction jobs for a few years but few long term jobs, too few to enable a Just Transition.
- A Just Transition has a negligible chance of being realised.

Build Back Better: Our Plan to Growth

- The OHL will do almost nothing to replace regional oil and gas job losses to level up the Region post the demise of oil and gas, as most transmission jobs are in the rest of Scotland and the UK.
- The OHL will bring few sustainable jobs. The present ~ 20,000 jobs in renewables across the UK is far short of replacing around 94,000 oil and gas jobs in the region (9) even when a few transmission jobs are factored.

Net Zero Strategy: Build Back Greener

- Grid infrastructure does play a key role in supporting electrification of the system towards Net Zero, but the crucial NESO spatial energy plan is not complete, and future demand is far more uncertain than this report asserts
- Based on the evidence presented, the role of grid infrastructure is not yet fully understood, so the proposal may not meet the demands of a decarbonised system.
- With £billions at stake, errors are expensive. Prior to implementation, SSEN should ensure it thoroughly understands the specific role of the infrastructure needed here and that the specific solutions it proposes are well matched with needs.

Strategy and Policy Statement for Energy Policy in Great Britain

- New network infrastructure is required at scale and pace to meet decarbonised system demands.
- It is pointless spending £billions on new infrastructure that doesn’t meet those demands.
- On the evidence presented, there is high risk of this, because critical information from the spatial energy plan is not available.
- Getting this project right is crucial. Pace is not an excuse to get it wrong.

NESO Clean Power 2030

- Expanding the grid to accommodate growth in renewable generation and demand is important
- Behind lies the aim to decarbonise heating and transport that drives demand growth.
- Timely, cost-effective grid upgrades, also a key aim, require grid expansion needed to meet demand growth, not to overshoot or fall short, nor too early or too late.

- Decarbonising heating and transport have proven difficult, is behind forecast, reducing the pace of demand growth, while deindustrialisation caused 29% demand reduction since 2005.
- Thorough assessment of all demand factors is essential to forecast realistic demand, needed growth in renewables, and their timing, to plan necessary grid expansion, and when it is needed.
- This assessment is not in place. The proposal runs ahead of essential information from the NESO SSEP, not yet complete.
- The proposal is not based on realistic demand because it neither allows for slow growth due to electrification nor for demand reduction due to deindustrialisation. The proposal is premature.
- On the evidence presented, there is high risk the proposal will not match the demands of the net zero energy system. Getting this right is crucial. Rushing is not an excuse to get it wrong.

Strategic Context – Scotland

- The existing grid allows utilisation of renewable electricity in Scotland without major modification for years to come. The only reason for network upgrades is to export excess electricity to England, achievable by subsea cable offshore without major change to the onshore grid, reducing onshore scope, land use and impacts.
- That the OHL supports "economic benefit in the form of GVA and job creation" is only true when the cost is ignored. The overall economic picture is that UKG pays for the OHL, other grid upgrades and renewables via subsidies funded by higher energy bills and taxes. These raises energy prices, a prime cause of deindustrialisation, and results loss of GVA and jobs.
- On a net basis, subsidies take more jobs and funds out of the economy than the GVA and jobs form the OHL put back. The overall effect is to shrink GDP.
- Transition is necessary, but it is vital to execute appropriate scope effectively to minimise the cost of subsidies and GDP shrinkage.
- The best way to achieve this is through thorough project development, the project value process, to ensure the best economic value from transmission projects
- "utilise local businesses and supply chains, enhance growth in communities, via better economic productivity in rural and deprived areas" is unlikely to be achieved as most OHL jobs are short term in construction.
- As few long term jobs are spread over the corridor and few businesses support the OHL, any productivity impact is negligible.

National Performance Framework and Programme for Government

- The Framework and Programme for Government express fine aims but these are unlikely to be realised from grid investment
- Most jobs are short term construction; long term jobs are too few to create sustainable growth, especially as grid investments are generally one-offs.

- Economic value generated from spend is too small to outweigh harm to communities, environment and amenity, especially when cost of subsidies driving fuel poverty is factored.
- Rather than enjoy, protect and enhance their environment, imposing the OHL will harm enjoyment and the environment and disenfranchise communities opposed to it.
- Whereas the aim is to tackle poverty by sharing opportunities, wealth and power more equally, this proposal is imposed from the centre
- Profligate spend and waste on subsidised renewables and grid infrastructure will increase energy bills and fuel poverty.
- Rushing projects to develop renewables leads to wasted spend and costs, for example wasted wind due to grid constraints
- Rushing large grid projects will cause waste. Getting projects right requires project development time and good data on supply and demand with many moving parts and uncertainties. Time well spent is money saved
- The best way to reduce waste is through thorough project development, the project value process, to ensure the best economic value from transmission projects

Scotland's National Strategy for Economic Transition (NSET)

- NSET has many fine aims but these are unlikely to be realised from grid investment
- The OHL will bring little to create a wellbeing economy where society thrives across economic, social & environment dimensions and delivers prosperity for local people.
- The social and environment dimensions of the OHL will harm wellbeing for people blighted by lower property prices.
- Negative impacts on communities and environments, bypassing local democracy by ignored opposition will go down badly with most local people.

National Planning Framework (NPF) 4

- The main thrust of NPF4 is to, almost universally, support renewable energy across the countryside while centralising power and decisions, ignoring local democracy.
- Aims to revitalise local areas to support sustainable development, maximise net economic impact, including local and community socio-economic benefits are unlikely to be realised.
- The OHL brings little lasting benefit to create an economy where society thrives across economic, social and environmental dimensions and delivers prosperity for local people.
- It will blight many people by reducing house prices, bring negative impacts to communities and environments in general, will bypass local democracy

Tourism Strategy: Scotland's Outlook 2030

- The OHL will diminish the corridor that hosts it as a great place to live and visit locally and globally.
- The impact of the OHL on golf courses, for example, Edzell, is dismissed as relatively minor with little harm to tourism. For regular and visiting golfers, the negative impact

and diminished allure of this lovely course in a lovely setting is obvious. Word of mouth travels.

Regional Economic Strategy: A Sustainable Economic Future for NE Scotland

- Renewables jobs are far too few to make a dent replacing 84,000 oil and gas jobs in the Region (9)
- Maintain Region GVA as a share of Scottish GVA requires something new to replace the high paid oil and gas jobs that will be lost over the coming years declines
- Many people are at odds with the pioneering "world leading" energy transition, believing the North East, Scotland and UK are showing how not to transition.
- Premature acceleration of the demise of oil and gas harming to the UK economy and jobs.
- Profligate, rushed spend on the transition is driving extremely high cost and high energy prices with disastrous secondary effects.
- Ill-considered, rushed, state-subsidised spending on renewables and grid upgrades drives high electricity prices and deindustrialisation harming the UK economy and jobs
- Spending on renewables and the grid is paid by subsidy. It removes money from the economy, reduces GDP, makes the UK poorer.
- The need to transition is not in question, but the focus should be cost-effective transition, least scope necessary, timed with demand.
- The best way to achieve this in grid projects is via thorough project development following good practice executing the project value process
- Wind farms remote from demand built before grid infrastructure, cause 40% wasted wind paid to shut in, adding to electrcity costs
- Wind farms should be considered in conjunction with grid connection, grid infrastructure capacity, demand, and the respective locations of generation capacity and demand.
- Slice and dicing wind farms from essential grid connection is common practice. Guidance in NPF4 is that the grid should not constrain renewable development.
- Both represent the opposite of what should happen and needs to happen to avoid waste and unnecessary costs that increase subsidies, drive up energy prices and reduce GDP
- A target to deliver 80% reduction in carbon emissions per head is hard to fathom when so much UK GHG emissions are outsourced. China, USA and India dominate GHG emissions
- UK contribution to GHG emissions is tiny. The rest of the world is not learning from us. It wonders why we are destroying our economy with high energy prices and accelerating oil and gas demise
- The aim to tackle unemployment and low wages by increasing businesses and creating well paid sustainable jobs is fine, but renewables, and grid funded by subsidies are shrinking GDP.

- Negative impact of subsidies on GDP, high energy prices and deindustrialisation, means profligate renewables and grid spend is unsustainable. The impact shrinks the GDP that funds transition.
- Without growth, the UK will go in a downward spiral. We must focus on cost effective transition to reduce the impact on energy prices and mitigate the negative GDP impact.

SSEN Housing policy and Community Building Fund

- The housing policy and £12 million CBF are well intended, but splitting across SSEN's portfolio, the diminishes the Regional and local impact
- The modest CBF is one of the few tangible local benefits, but spread thinly across the OHL corridor will have little impact
- That the housing strategy will tackle temporary shortages during construction is good but helping meet Region long term housing needs and depopulation is not credible.
- The long term housing need is affordable housing for people on low income. The housing policy is not aimed at this, but to house construction workers.
- Depopulation is driven by other factors, notably rapid decline in oil and gas jobs. Sustainable jobs from the OHL are tiny by comparison.

Tourism Assessment

- As the 93,000 oil and gas jobs (9) in the region decline, the challenges are depopulation and retaining working age population.
- Renewables at best replace a small fraction of the oil and gas jobs. Growth in other jobs is needed; tourism is at or near the top of the list; sustainable jobs from the OHL would be insignificant.
- Sustainable tourism is a growth sector where Scotland has a comparative advantage through Scotland's iconic landscapes, history and cultural heritage, and wide reaching reputation.
- By "slicing and dicing" (separating applications for parts of the same project to avoid overall impacts), the report finds most tourism slices suffer minor impact or are localised affecting minor numbers. Overall impact of the OHL on tourism is assessed as "negligible," visitors' motivations are "unlikely to be materially influenced". The approach is invalid, because no attempt is made to assess overall impacts on visitors' experiences, impacts of interactions between the slices, and knock-on impacts, for example reputational damage.
- Some visual impacts are assessed as significant but the effect on tourism and recreation behaviour is insignificant. It is asserted that fishermen set to visit the N and S Esk rivers will go to elsewhere; that golfers are undeterred, looking at the golf course, not the OHL. It is asserted that walkers are unaffected by the view. "Moving path users often experience views in a dynamic way, reducing the perceptual impact of visual change." Impacts on accommodations are minor; a handful will suffer modest impact.

- Many conclusions are assertions based only on the writer's opinion; the general approach is dismissive because the writer is paid by the applicant to show the proposal in a good light. Little evidence is presented to support this; for example, to show that golfers and walkers won't be deterred, or accommodation users won't go elsewhere.
- Assertions and evidence given are based on visual impact of "normal" pylons. Most UK pylons are smaller, up to ~ 35 m tall; the controversial new East Anglia line pylons are 50 m tall. But these pylons are up to 70 m tall, the largest in a UK OHL. Running through lowland and low relief countryside, hilly terrain to the West, lowland and coastline to the East, the OHL will be highly visible from longer distances along much of length of the line on the landscape from one horizon to the other. The OHL will cause an indelible scar on the landscape. Visitors may well be deterred.
- With no relevant evidence to the contrary for and OHL of this scale, there is serious risk of deterring significant visitors, harming tourism.
- In a Region where tourism is a top source of sustainable jobs to replace rapid decline of those in oil and gas, the impact of the OHL is unwelcome

3. Property Value Impact
SSEN claim the TKUP pylon line will have no adverse effect on property values. The direct experience of the homeowners in these cases strongly suggests otherwise.
• One couple later reported that the "location" was not right for them. One couple's home was valued at £420,000 on 10 March, 2026, with the Home Report explicitly noting proximity to the proposed pylons. Even before the property went on the market, a keen prospective buyer approached them privately, viewed twice, was discussing mortgages and a formal offer, then withdrew – specifically citing the pylons as one of the reasons.

Once listed on 23 March, the property attracted strong initial interest. Several viewers spent considerable time at the house, described it as ideal for them, and in some cases were already talking about offers and moving dates. However, in case after case, initial enthusiasm collapsed once they read the Home Report or investigated the TKUP route and realised the house lay within the proposed pylon corridor and in close proximity to the line:

• One couple later reported that the "location" was not right for them.

• Other viewers, who had loved the property, never proceeded further after reviewing the Home Report and learning about the pylons.

• One buyer made a verbal offer, then a revised offer (below market value) which the sellers accepted in principle. When this buyer discovered the pylon issue, they withdrew entirely, stating that no price reduction could compensate for the loss of the location and view.

• Another family, who wrote that the house had "ticked every box" and that they had "mentally moved in", confirmed in writing that discovering the property lay in the proposed pylon corridor was a "deal-breaker" and they would not be making an offer.

In each of these cases, the determining factor was not the house itself, but the impact of the proposed TKUP pylons. Multiple serious buyers walked away, and one explicitly rejected the idea that a lower price could offset this. This clear pattern of lost offers, reduced willingness to pay, and buyers explicitly citing the pylons as a deal-breaker demonstrates that the TKUP line is already materially and negatively affecting the marketability and value of property, directly contradicting SSEN's claim that it will have no adverse effect on house values.

AC
JDC
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