

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

CONSULTATION RESPONSE TO AEI

Public Inquiry Written Submission by NOTKUP, Objectors

Objections to Additional Environmental Information submitted by applicant – February 2026 (numbers in brackets refer to AEI document)

Additional Environmental Document

Whilst mitigation addresses omissions found previously, the following concerns still remain:

1 Traffic and Transport/ Roads

- There is still no Outdoor Access Management Plan (OAMP), only an outline one - there will be a need for the consideration of temporary traffic lights/temporary management systems, and it may be necessary to have separate plant and pedestrian areas. Due to the limited width on most rural roads (barely 3m wide in places), this may create a safety issue for pedestrians. At present, pedestrians can move to grass verges if traffic passes. (LU2)
- The scheduling of HGVs will avoid near key receptors such as schools where practicable, yet no details are given and concerns remain as to the definition of “where practicable”. (TA9)

2 Land Use and Agriculture

- The need for wheel cleaning facilities to prevent the spread of PCN has been noted. It depends on the views of local authorities, so there is no detail or guarantee at present, and the concern regarding biosecurity still remains. This is particularly as SSEN and their principal contractor have failed to comply with required biosecurity standards on other projects, resulting in regulatory involvement. (TA9)
- The embedded mitigation as part of the referenced Proposed Development’s iterative corridor, routing and alignment design development process, failed to include safety during their appraisals at each stage, particularly with regard to pipeline crossings and SAG height. (LU1)
- There is an indication that land not required for permanent infrastructure following construction will be restored to original use, and there will be no need for future monitoring. Good quality agricultural land takes years to reach its present quality. There is no indication of who will restore this land and the procedure, which in reality cannot be achieved in the short term. (LU3)
- Displaced soils will be re used as close to the source location as possible, yet this disregards biosecurity concerns. (EC25)

3 Noise

- Construction Working Hours cannot be considered as mitigation. The hours are extended, and during winter will include non-daylight hours. Given they are proposed to be seven days a week, there will be no respite for sensitive receptors in close proximity to the construction noise. (G3)
- No special measures close to sensitive receptors have been identified, despite sensitive receptors being known. (G3)
- Permanent towers and conductors are not proposed to be located within 100 m of Noise Sensitive Receptors (NSRs). Beyond this distance, the conductor produces relatively low noise. Given the Noise baseline is an extremely limited data set and certain atmospheric conditions have not been modelled, the statement of 'relatively' low noise out with 100m is at best unclear. How much noise? In what conditions? At what distance? (NV2)
- Community engagement has been mentioned in relation to ensure legal compliance with Control of Pollution Act 1974, yet this community engagement is not specified. (NV4)

4 Flood risks

- A detailed CEMP (containing a PPP, PMP, and Site Water Management Plan) is still not available. In addition, a Construction Flood Response Plan will be available, but is still not available, and concerns remain regarding recent flooding events along the route. (HGA-A)
- No details of culverts are available yet, as to be within the CEMP. (HG15)
- A PWS Abstraction Assessment will commence 12 months ahead of construction. In addition, there is concern that not all PWS have been identified, as identification was reliant on those having PWS supplying data to SSEN. (HG17)

5 Landscape

- Paralleling existing lines has only been considered in proximity to the listed examples. OHL's currently exist for much of the route between Fetteresso and Tealing, and from Fetteresso to Drumtochty Glen. However, routes paralleling the existing line have not been put forward as route options. (LV1)
- Despite the statement stressing the need to avoid key landscape features such as distinctive landforms and areas of broadleaved and coniferous woodland that contribute to landscape character, numerous such areas are affected. In addition, numerous trees are being felled to accommodate road widening. (F1)
- Re-planting is to be agreed prior to construction, yet details are still unavailable. Proposed locations are considerably distant from affected areas, so local areas still have a loss of biodiversity. (F4)
- Whilst removal of established woodlands of Plantation Origin (LEPO) and native woodland is to be reduced, it is still apparent, including in some areas where minor route alignment would remove the need for tree felling. (F5)
- Biodiversity compensation details regarding re-siting are still not available. (EC19)
- Landscape Mitigation Plan will be developed POST consent, so details unavailable to decision makers at time of determination. This means the residual impact cannot be accurately assessed, and decision makers are unable to decide if the residual impact is acceptable. (LV3)

6 Wildlife and Ornithology

- The statement that Ecological survey updates will be undertaken, to ensure survey data being relied upon during construction is not more than 12 months old, or as per Best Practice guidelines. Surveys will be undertaken in the species-specific survey season immediately prior to construction. However, ecological baseline surveys were not completed for the current EIA. As such the existing baseline is not robust. Given

the failure to complete the baseline ecological surveys prior to EIA submission it is unlikely the above will be achieved. (EC14)

- “Avoidance of Designated Sites and areas of high bird use through the routeing and alignment processes.” Given documented gaps in baseline information within the EIA and the gaps identified within the Single Objection Document, the avoidance of areas of high bird use during alignment, cannot be considered as robust mitigation. (O1)
- Gaps in the baseline mean the residual impact post mitigation cannot be considered robust. (O2, O6)

Angela Taylor, for NOTKUP

April 2026