

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

**TEALING TO KINTORE UPGRADE PROJECT (TKUP) TRI-120-1**

**CONSULTATION**

**Public Inquiry Written Submission**

**1 Introduction**

I am Eileen West. I live equidistant and north of a line between Drumoak and Banchory, in Aberdeenshire.

I have prepared and now submit this written evidence to the Examination to set out NOTKUP's serious concerns regarding the adequacy, integrity and lawfulness of the consultation and engagement undertaken by Scottish and Southern Electricity Networks (SSEN) (the Applicant) in relation to their proposed TKUP OHL.

In March 2024, during an STV Tonight special programme on the proposal, Gillian Martin MSP, then Acting Cabinet Secretary for Net Zero and Energy, stated that SSEN must *“engage early, thoroughly and sympathetically with communities otherwise these projects may not come to fruition.”*

Measured against that standard, the TKUP's consultation process has manifestly failed. Engagement has been late, partial, defensive and, at times, openly dismissive. It has not been *“early, thorough or sympathetic”*. As such, it does not meet the expectations set by Scottish Ministers, the Gunning Principles of lawful consultation, nor the Treasury Green Book guidance for major public infrastructure.

**2 Late, Inadequate and Poor-Quality Engagement**

2.1 Initial awareness and artificially short consultation windows for many affected communities.

Our first awareness of the project came not from SSEN, but on 31 May 2023, when Andrew Bowie MP (West Aberdeenshire and Kincardine) wrote to his constituents alerting them to SSEN's OHL and substation proposals. This was, for the majority, the first notice of what is now rightly perceived as a catastrophic corridor of industrial infrastructure.

The initial consultation window was extremely short. Only after concerted public pressure was it extended - first to 23 June, then again to 28 July - following intervention from elected officials and local campaigners. These extensions were reactive, not planned, and demonstrate that adequate time for informed engagement was not built in from the outset.

## 2.2 The Peterculter Public Meeting – a box-ticking exercise.

On 18 July 2023, Peterculter Community Council invited SSEN to a public meeting attended by around 100 local residents. The conduct of SSEN’s team at that event strongly suggested they were present under duress and primarily to “tick a box”, rather than to listen or respond meaningfully.

Key features included:

- Poor professionalism and presentation:
  - The Senior Project Engineer, arrived late, dishevelled and unapologetic.
  - SSEN presenters had to be prompted to introduce themselves. When they did, it was reluctant and inaudible.
  - Visual materials consisted of busy, text-heavy slides displayed on a domestic-sized television on a stage, impossible to read from the front of the hall and clearly not designed for a live audience.
  - Claims of a “forensic” survey contradicted by ignorance of basic local constraints:

The Senior Project Engineer asserted that SSEN had conducted a highly detailed survey of roads, environment, agriculture, businesses and residences along the route. Yet under basic questioning he:

- Did not know what the AWPR (Aberdeen Western Peripheral Route) was. It is one of Scotland’s most significant transport projects and many at the meeting asked why cabling had not been buried alongside it during construction as it followed the proposed route at the time. He didn’t know.
- Appeared unaware of a busy helipad on the proposed route, needing it to be described as “a big round thing with an H on it” by collective voices in the room.
- Claimed not to know about the internationally important overwintering pink-footed geese population at Loch of Skene, despite this being cited as a major justification for relocating the route to its current alignment.

These gaps fundamentally undermine SSEN’s assurances that the route had been thoroughly assessed. At that meeting, residents invited SSEN to examine an alternative

viable strategy, not just an alternative route alignment. That invitation was not acted upon.

2.3 A swift shift to a preferred route then occurred, without strategic reconsideration.

The very day after the Peterculter meeting (19th July), SSEN announced on social media that it had shifted the route west to what is now widely believed to have been its preferred alignment from the outset. SSEN presented this as a response to public feedback, when in reality it appeared to be a pre-determined fallback position.

In the same statement, SSEN promised to update Peterculter Community Council by October 2023 on the outcome of an “expanded site selection”. Notably, this referred to site selection, not a broader appraisal of strategy or technology which was what had been requested.

That self-imposed deadline passed without an update. The next communication came only on 28th November via SSEN’s website, unveiling the current route which passed through several villages and oversailed the grounds of three primary schools. Although SSEN claimed that “all stakeholders” had been notified, many residents, including households directly beneath section F1.3, only learned of the revised route through word-of-mouth.

2.4 The 13th December webinar – opaque and exclusionary.

SSEN held an online webinar on 13th December which many participants later described as a “travesty”.

Key concerns included:

- Questions submitted in real time were not displayed on screen for all to see.
- Many questions were neither answered during the event nor followed up afterwards.
- When challenged about poor notification, SSEN’s Head of Corporate Affairs, Greg Clarke, again insisted that “all stakeholders” had been informed, despite multiple participants stating on the webinar that they had not been. Their comments were not acknowledged.

2.5 Written responses – generic, delayed and dismissive.

Written feedback mechanisms, far from building trust, have become a major source of community frustration. Residents routinely report:

- No response at all
- Significantly delayed responses, often weeks or months later

- Formulaic, “copy-and-paste” letters that fail to address the specific questions raised.

This pattern of generic and evasive correspondence reinforces the perception that consultation is being conducted as a mere procedural hurdle, not as a genuine exercise in listening or co-design.

2.6 Drumoak and subsequent 2024 meetings – commonly referred to locally as “insultations”, not consultations.

Drumoak public meeting had prescriptive conditions imposed and non-engagement. On 15 February 2024, Crathes, Drumoak and Durriss Community Council (CDDCC) hosted a public meeting with SSEN in Drumoak. The conditions imposed by SSEN as a prerequisite for attendance were draconian and incompatible with any notion of open consultation. These included:

- A 4pm to 7pm “drop-in” with maps, followed by a 7–8 pm formal session.
- No Deeside Against Pylons logos, banners or leaflets were to be visible otherwise the SSEN team would leave.
- No questions from the floor were permitted during the formal session.
- All questions had to be submitted in writing via CDDCC, collated and sent to SSEN two weeks in advance, leaving residents with only a short initial window of one week to submit their questions.
- An explicit prohibition on comments from the floor, with a warning that “security would be present”.
- A stated refusal by the Senior Project Engineer to face live Q&A from the floor due to “stress” following the Peterculter meeting.

Residents arrived with reasonable expectations that, given the strict pre-conditions and the time SSEN demanded, their questions would receive substantive, tailored answers.

In practice:

- SSEN staff read from prepared scripts, with no opportunity for follow-up or clarification.
- There was no meaningful engagement with the substance of many concerns.
- SSEN representatives left the hall promptly at 8 pm, declining to remain for the Q&A session offered by Alexander Burnett MSP and Andrew Bowie MP.

Many residents described feeling “shocked” by the authoritarian format and the high levels of stress and expectation created. One attendee summarised the event as follows:

*“The presentation was basic, unprofessional and disappointing. I was expecting much more and something comparable to the recent and excellent Hill of Fare presentation in Banchory. SSEN’s answers were non-committal, evasive and contradictory twaddle. I just couldn’t believe the panel. It was either incompetence or total disregard for the community. I was embarrassed for the panel initially but came away furious and more stressed than ever. I learnt absolutely nothing apart from the fact that SSEN has no interest in communicating with the people who are in danger of being significantly affected by their actions and have not demonstrated to me any ability to listen to the wealth of expertise in the area.”*

These sentiments are widely echoed across hundreds of comments received by local groups along the length of the line.

#### 2.7 Out-of-date mapping and failure to answer follow-up queries.

At Drumoak (and other events), SSEN relied on Ordnance Survey mapping which was astonishingly up to 20 years out of date. Significant new housing developments and even a school were missing. This calls into question the robustness of route appraisal and the seriousness with which community impacts were considered.

Residents were invited to leave email addresses so that specific queries could be answered later. Despite extensive follow-up by local community bodies and social media networks, we are not aware of any residents who received substantive responses to their questions.

#### 2.8 Disrespect and dismissiveness at further “consultation” events.

Subsequent consultation events along the Kintore–Tealing corridor have been very well attended. One in Drumoak alone attracted over 400 residents, a clear indicator of the community’s concern. The conduct of some SSEN staff has been consistently described as:

- Contemptuous, dismissive and disrespectful
- Insufficiently informed about local conditions or the details of the scheme
- Resistant to note-taking or any observable process for recording concerns

Frequently asked basic questions such as why no staff appeared to be taking notes or logging issues were met with the response that residents could, “*email us ... that’s why we’re here*”. On one occasion in Drumoak, a distressed woman described how her father had suffered a heart attack reportedly triggered by stress from the prospect of multiple pylons on his small croft. The SSEN representative showed no visible empathy, took no details and offered only the instruction that she should email. Another attendee stepped in to support her, astonished at the lack of care.

A survey conducted by Crathes, Drumoak and Durriss Community Council (CDDCC) asked the question, “*What best describes your opinion on the two pylon routes?*” 98.5% said they objected and the results of a combined Community Councils’ questionnaire clearly show over 90.5% of respondents objected to the Tealing to Kintore OHL proposal with strong urging for SSEN to investigate alternative methodology subsea or underground. Yet, the SSEN team repeatedly told residents at Drumoak that by their reckoning it was “50/50 for/against”. Members of Deeside Against Pylons personally remained at the Drumoak consultation for the full 5 hours and this was not their interpretation of those leaving the Church Hall. Many (including men) in tears, most extremely frustrated, distressed, demoralised and disillusioned, many fearful and very many angry.

An increasingly common question asked of SSEN staff at these events is simply: “*How do you sleep at night?*”

## 2.9 Meetings with SSEN Community Engagement Policy Manager.

Representatives from each aligned group met regularly over a period from September 2024 to November, 2025 with the Community Engagement Policy Manager at SSEN. Some travelled significant distances expecting genuine two-way engagement. All were disappointed.

- It became clear that SSEN’s approach amounted largely to information-gathering and “box-ticking,” rather than meaningful listening. Notes circulated after meetings were frequently inaccurate and did not fairly reflect the communities’ concerns.
- After repeated requests from the communities, a date was finally agreed for a Technical Forum between community technical representatives and SSEN’s technical team. This was intended as a form of redress for communities who had not been adequately listened to, nor had their concerns addressed or acknowledged.
- SSEN’s final proposed format for the Technical Forum was a pre-scripted, prescriptive presentation, delivered by unnamed and undisclosed SSEN employees with only 20 minutes allocated for open discussion. This amounted to delegates being “talked at” rather than engaged in genuine dialogue.
- Given the weeks of negotiation to secure an open and balanced forum, and the backdrop of two years of disruption and an autocratic approach from SSEN, this one-way format was not considered capable of delivering a constructive or productive outcome.
- The community representatives cancelled the proposed Technical Forum and ended communication with the Community Engagement Policy Manager,

concluding that the process was a waste of time and incompatible with the principles of genuine public consultation and community engagement for a major project such as the OHL.

#### 2.10 SSEN's Kintore to Tealing 400kV OHL Application

- SSEN must display hardcopy of the application in various public venues. The original application contained 545 documents, some up to 100 pages, totally an estimated 4,360,000 words (War and Peace has only 587,287 words) and the 14 outsize lever arch files weighed 200kg. One of the venues the public were invited to read the application was a mobile library.
- For a nominal fee of £1,000 (+ P&P) SSEN would send anyone who asked a hardcopy.
- A common frustration is that the Chapters within the application refer to multiple sources, annexes and associated documents which require a level of internet skills, a great deal of internet data and time to navigate. Referenced articles comprise figures, tables and further annexes.

### 3. Property values, financial harm and SSEN's denial of evidence

#### 3.1 Repeated denial of likely property value impacts.

At multiple events, residents have raised concerns about the impact of 60–70 m pylons within close proximity to homes. SSEN representatives, including the Senior Project Engineer, have repeatedly assured individuals that there would be “no impact” on property values.

Specific examples include:

- At Echt, the Senior Project Engineer told a resident that her property value would not be reduced, despite a 68 m pylon proposed approximately 100 m away.
- At Drumoak, he repeated this claim and was challenged by a chartered surveyor who offered to provide research demonstrating potential value reductions of up to 40%, with many properties rendered unsellable. The Senior Project Engineer's recorded response was: *“Don't bother sending it to me, I won't read it.”*
- At Auchenblae, an elderly resident was similarly told there was “no evidence” of detriment to his property value.

These statements are contradicted by emerging real-world examples along the corridor:

- Mortgage lenders have refused loans for properties on the proposed route.

- A resident of Echt had an agreed part-exchange with Bancon Homes withdrawn after the pylon route changed between consultation rounds. Bancon Homes cited valuation uncertainty.
- A former resident of Wester Letter, Lyne of Skene, is suing SSEN after a sale fell from £700,000 to £575,000 when a buyer withdrew upon learning of the proposed pylon route near the property - a case widely reported in the press.

These examples demonstrate that financial harm is already occurring as a direct, foreseeable consequence of the project, yet SSEN continues publicly to deny or minimise any such risk.

#### **4. Health, wellbeing and EMFs**

Many residents have raised concerns about health and wellbeing impacts, including stress, anxiety and the potential effects of electromagnetic fields (EMFs) associated with the unprecedented high-voltage overhead lines.

On EMFs specifically:

- SSEN distributed a leaflet on EMFs, printed in 2023, but the most recent research cited in it is from 2015. The failure to reflect more than a decade of subsequent epidemiological and meta-analytic work is misleading and not consistent with the duty to provide up-to-date, balanced information.
- When challenged, SSEN staff emphasised the print date, rather than the underlying evidence base, and refused to engage meaningfully with more recent scientific studies that residents offered to share.

In combination, this amounts to a systematic repudiation of legitimate health concerns.

The same CDDCC survey mentioned previously posed the question, *“Do you feel like the proposals for overhead lines are having a detrimental impact on your health and wellbeing.”* 80.9% responded YES.

#### **5. Failure to meet the Gunning Principles of lawful consultation**

The Gunning Principles, as articulated by Mr Stephen Sedley QC (1985) and subsequently endorsed repeatedly by the courts, set out minimum requirements for lawful public consultation:

1. Consultation must take place when the proposal is still at a formative stage.

2. Sufficient reasons must be put forward for the proposal to allow for intelligent consideration and response.
3. Adequate time must be given for consideration and response.
4. The product of consultation must be conscientiously taken into account in finalising proposals.

On TKUP, SSEN has breached these principles in the following ways:

#### 5.1 Principle 1 – Formative stage.

SSEN began “consultation” only after a 400 kV overhead line had been determined as the sole design option. SSEN has repeatedly asserted that this was “instructed” by the National Grid Electricity System Operator (NGESO) in the Pathway to 2030 and subsequent Holistic Network Design (HND) Refresh.

However, those documents specify:

- Two new subsea HVDC links (EGL3 and EGL4); and
- Upgrades to two existing OHL routes.

There is no explicit instruction for a new 6 GW overhead line between Tealing and Kintore. **The OHL solution is SSEN’s own proposal.** It was never presented to the public at a genuinely formative stage with alternative technologies (e.g. underground HVDC, subsea routes) still open for meaningful discussion. Aside from anything else, that is contrary to the Århus Convention.

#### 5.2 Principle 2 – Sufficient information for intelligent response.

SSEN has not provided clear, robust reasons for selecting an overhead AC line over alternative options, particularly subsea or underground HVDC, that would allow stakeholders to make an “*intelligent and informed*” response.

Instead, SSEN has:

- Considered the 100 km Kintore–Tealing stretch in a blinkered, stand-alone manner rather than in the context of the wider UK transmission strategy, especially the significant planned subsea capacity.
- Published high-level claims that alternative technologies are “too expensive” or “too difficult” without providing route-specific, fully costed, independently scrutinised options appraisals.
- Failed to explain why, given the generation is predominantly from offshore wind in the far north-east and demand is largely in the south of England, subsea HVDC is not the default solution for bulk power transfer—despite NGESO’s own preference for subsea links in much of the Pathway to 2030.

In short, communities have not been given enough information on options, costs, benefits and trade-offs to engage intelligently with the proposal.

### 5.3 Principle 3 – Adequate time.

The original consultation windows were unreasonably short for the scale and complexity of the proposal and were only extended after public and political pressure. Time extensions offered were reactive, fragmented and poorly communicated, undermining the possibility of considered, collective responses.

### 5.4 Principle 4 – Conscientious consideration of consultation responses.

Feedback which goes beyond marginal route adjustments has been largely ignored. Objections to the choice of technology (overhead AC vs HVDC underground or subsea) have been treated as out-of-scope or dismissed at an early stage, despite being central to the project's impacts and viability.

Residents report a near-total absence of evidence that SSEN has conscientiously weighed arguments for alternative design approaches. This is consistent with SSEN staff statements that the project is a "*fait accompli*" and that their events are merely about local routing.

## 6. Failure to comply with the Treasury Green Book

As the monopoly transmission operator for the North of Scotland, whose project budgets are ultimately regulated by Ofgem and funded by consumers, SSEN is obliged to adhere to the principles of HM Treasury's Green Book for appraisal and evaluation of public projects.

A key requirement of the Green Book is a properly costed options appraisal, including systematic consideration of credible alternatives.

To date, SSEN has not provided such an appraisal for TKUP. Instead, it has:

- Relied on vague "rule of thumb" cost ratios for alternatives without route-specific detail or transparent assumptions.
- Failed to present fully worked options comparing:
  - Overhead AC OHL
  - Underground HVDC solutions using modern installation methods (e.g. spider plough, trenching systems)
  - Seabed/subsea HVDC options in light of the existing and planned Eastern Green Link projects

Given the long-term nature, scale and environmental impact of TKUP, this absence of transparent, Green Book-compliant options appraisal is indefensible.

#### 6.1 Ignoring proven technologies and SSEN's own subsea expertise.

SSEN has argued repeatedly that undergrounding or subsea transmission is technically difficult, costly or high-risk. This ignores several critical facts:

- Offshore wind generation in the North Sea is already predominantly brought ashore via HVDC technology.
- SSEN itself is a major partner and lead developer in multiple subsea HVDC schemes, including:
  - EGL2 (joint with National Grid – Scottish converter stations and cables);
  - EGL3 (SSEN's flagship project – planning, consents, infrastructure for the Scottish portion);
  - EGL5 (joint with NGET – offshore HVDC between Scotland and England, Scottish responsibilities as above);
- The subsea HVDC link from Peterhead to South Humber, for which SSEN is lead developer.

Collectively, EGL2, EGL3, EGL5 and the Peterhead–South Humber link will provide several gigawatts of new north–south capacity, effectively forming an offshore HVDC “spine” for bulk power transfer from Scotland to England. This system is:

- Highly controllable
- Largely independent of inland AC network constraints
- Ideally suited to transporting large volumes of offshore wind energy over long distances

This raises a fundamental strategic question that has never been satisfactorily answered by SSEN:

Why is a further 400 kV overland OHL, with pylons of up to 70 m in height, needed at all between Tealing and Kintore, when offshore HVDC routes already in development could, in principle, provide much of the same transfer capacity with substantially less impact on communities and landscapes?

It is reasonable, and indeed necessary, for the Inquiry to require a transparent, rigorous assessment of whether optimising these subsea links could either:

- Remove the need for TKUP entirely or
- Radically reduce the scale of onshore reinforcement required

SSEN's refusal to engage in such a dialogue at consultation stage, and its blanket dismissal of undergrounding and subsea alternatives as "too expensive" or "impractical" without robust evidence, is misleading and, I would argue, mendacious.

It should also be taken into consideration that the recent Hamburg Declaration signed on the 26<sup>th</sup> January, 2026 represents a major shift towards a regional "North Sea Grid". This would allow the offshore wind farms to connect into HVDC lines offshore allowing electricity generated in one country to be onshored in another when demand required it. Whilst at an early stage it should have been considered by SSEN at application.

## **7. Disregard for local expertise and lived experience**

The north-east of Scotland is a global hub of energy expertise and excellence, especially in offshore, subsea and high-reliability infrastructure. Experienced professionals from the oil and gas and renewables sectors live in the very communities now threatened by TKUP.

Members of these communities, including highly qualified engineers, surveyors and project managers, have repeatedly offered SSEN their time, knowledge and experience to work collaboratively on modern, lower-impact solutions. These offers have been ignored or curtly rejected.

In addition, SSEN has refused to recognise decades of proven practice in the oil and gas industry in monitoring and maintaining buried pipelines and cables using technologies such as:

- Distributed Acoustic Sensing (DAS)
- Distributed Temperature Sensing (DTS)
- Distributed Temperature and Strain Sensing (DTSS)

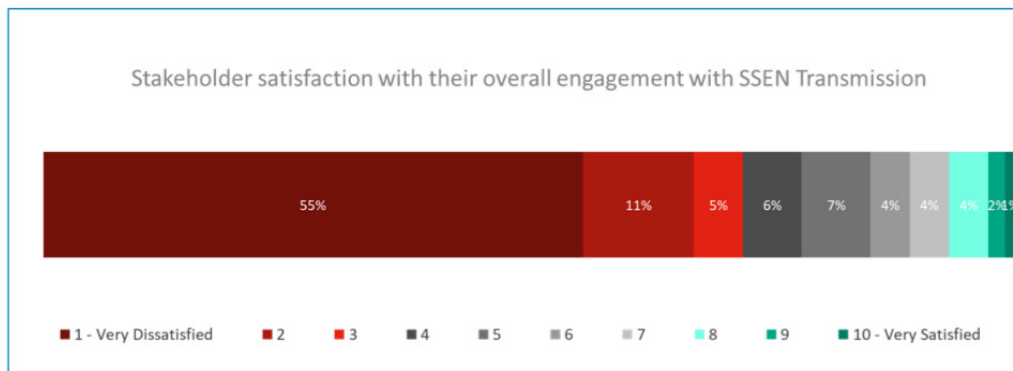
SSEN staff insist that locating and repairing faults in underground systems is inherently more difficult and riskier than for overhead lines, without acknowledging the wide deployment of advanced monitoring technologies that have delivered highly reliable subsea and buried networks in far more hostile environments than agricultural land.

It is also worth noting that highly reliable, low-maintenance infrastructure may not align with the commercial incentives created by lucrative, long-term maintenance regime!

At a minimum, this misalignment of incentives should be recognised and scrutinised by the Inquiry.

## **8. Evidence from SSEN's own Independent Stakeholder Engagement Survey**

The problems outlined above are not isolated or anecdotal. SSEN’s own Independent Stakeholder Engagement Survey for 2024–25, commissioned by SSEN itself, provides strong corroboration.



The survey covers:

- Local residents and community groups
- Landowners and farmers
- Local authorities and elected representatives
- Environmental organisations
- Businesses and statutory bodies

Across this wide stakeholder base, consistent themes emerge:

- Consultation as a formality. Engagement is widely experienced as procedural “box-ticking”. Many believe key decisions are already made by the time information is shared.
- Late engagement. Stakeholders report that engagement begins too late, once routes and technologies are largely fixed, and without genuine openness to change.
- Limited transparency. SSEN is seen as failing to explain clearly why certain routes and technologies have been chosen or which alternatives were considered and rejected, with insufficient discussion of cost/environmental/local disruption trade-offs.
- Poor communication during construction. Stakeholders describe significant disruption (traffic, noise, access restrictions) with inadequate advance notice. People often discover impacts only when works begin.
- Landowners and farmers particularly disregarded. They report short-notice access requests, poor coordination, inadequate biosecurity and interference with critical seasonal operations, all with little sense of partnership.

- Digital exclusion. Heavy reliance on online channels leaves rural and older residents disenfranchised. There is limited use of letters, local noticeboards or non-digital methods.
- Community benefits perceived as conditional. Many believe funding offers are, in practice, linked to planning outcomes and used to soften or buy off opposition, undermining trust.

The clear conclusion from SSEN's own survey is that voluntary, internal efforts at improvement have been insufficient. SSEN is perceived as fairly technically competent but insufficiently transparent, too ready to treat engagement as a box-ticking exercise and unwilling to share the full picture with those affected. This is a fraud on the public, as there is a clear intent to deceive by omission.

### **9. SSEN's own admission: "We're box-ticking – they'll never stop it"**

Beyond perception and survey data, there have been disturbing direct admissions from SSEN staff regarding the true nature of their "consultations".

Multiple accounts, including one from a meeting involving Ofgem and a government agency employee, record the SSEN Senior Project Engineer boasting that, *"We're box-ticking ... they'll never stop it."*

Such statements, if accurately reported, confirm that SSEN sees the consultation process not as an opportunity to shape or improve the project, but merely as a regulatory obstacle to be navigated.

A further conversation between a technically knowledgeable resident and an SSEN member of staff is revealing. The SSEN staff member reportedly:

- Described the Drumoak event explicitly as not being a consultation meeting
- Stated that SSEN was not required to consult on the proposal at all but chose to hold "information sessions" to present its routes and long-term strategy

If this accurately reflects SSEN's approach, then branding documents as "Report on Consultation" (e.g. 19th August report) are at best misleading. It also appears fundamentally at odds with Scottish Government guidance on good consultation practice, the Minister's assurances and requirements, and with SSEN's own stated commitments to "early consultation".

### **10. Wider legal and constitutional context**

Rhion Jones, Founder of the Consultation Institute and a widely recognised authority on the Gunning Principles, has observed that:

“Failure to follow the Principles almost certainly means that consultees have been significantly disadvantaged and recent years have seen a large number of cases where public bodies have had their decisions challenged.”

He further notes that courts have become more interventionist and that expected standards have risen over time.

On the facts set out above, there is a strong argument that SSEN has:

- Failed to consult at a formative stage
- Failed to provide sufficient information for intelligent response
- Failed to allow adequate time
- Failed to conscientiously consider consultation outputs, particularly around strategic alternatives.

SSEN therefore has good reason for grave concern that TKUP could be vulnerable to judicial review if consent is granted on the basis of the current process.

## **11. Visual, environmental and human impact**

SSEN’s proposal would see 60 m –70 m high pylons sited approximately every 350 m along a corridor through some of Scotland’s most valued landscapes and communities. SSEN itself has suggested this equates to around 1,500 pylons down the spine of Scotland.

These are not ordinary pylons. For context, their height is:

- Only a few metres lower than Westminster Abbey
- Roughly double the height of the central tower of Balmoral Castle
- Several metres taller than a Queen Elizabeth-class aircraft carrier

Placing such structures as close as 100 m from homes, farms and schools is a proposal of profound, generational significance. Many residents already feel that their mental health and quality of life have been seriously affected simply by the prospect of these structures.

## **12. Conclusions and requests to the Inquiry**

Communities along the Tealing to Kintore corridor are not opposed to decarbonisation or grid reinforcement. They are opposed to a 20th-century solution to a 21st-century problem, imposed without transparent appraisal of modern alternatives and without lawful, good-faith consultation.

The evidence summarised above demonstrates that:

- SSEN’s engagement has been slack and lazy, late, heavily constrained and often hostile to meaningful dialogue.
- SSEN has breached the Gunning Principles and failed to meet Treasury Green Book standards for options appraisal.
- SSEN has dismissed or ignored credible alternatives such as subsea and underground HVDC, despite being a leading practitioner of those very technologies elsewhere in its business.
- SSEN’s own Independent Stakeholder Engagement Survey confirms that these failings are systemic, not incidental.
- SSEN staff have, on multiple occasions, described the process as mere “box-ticking” and asserted that the project is a fait accompli.

In light of this, NOTKUP respectfully invites the Inquiry to:

1. Explicitly find that SSEN’s current engagement and consultation practices in relation to TKUP are not fit for purpose and do not meet the Gunning Principles, the Treasury Green Book, or good practice standards expected in Scotland.
2. Require a full, transparent, independently scrutinised options appraisal for north-east transmission reinforcement, including:
  - Overhead AC OHL
  - Underground HVDC
  - Subsea HVDC solutions, explicitly factoring in EGL2, EGL3, EGL5 and the Peterhead–South Humber link
3. Require SSEN to re-consult at a genuinely formative stage, on the basis of that options appraisal, with:
  - Sufficient time
  - Accessible, up-to-date information
  - Genuine openness to reconsidering route and technology choices

4. Give significant weight to the overwhelming local opposition evidenced by community surveys (e.g. CDDCC's finding that over 90.5% of respondents object to the OHL and 80.9% report detriment to health and wellbeing) and to the demonstrable financial and emotional harm already being experienced.

5. Recognise that social licence is essential to any ambitions for delivering net-zero infrastructure at pace. Projects that ride roughshod over communities undermine not only local trust but also the broader public confidence on which future energy transitions depend.

### **13. Final submission**

As elected representatives, Ministers and officials presiding over this Inquiry, you are there to safeguard the public interest, protect communities from avoidable harm and uphold fundamental rights including the right to health, to a safe environment and to a fair process.

The communities affected by TKUP are not asking for the impossible. They are asking that:

- Proven, modern technologies be fairly assessed
- Their expertise and lived experience be respected
- Their health, livelihoods and landscapes be valued alongside the imperative to decarbonise
- Decisions of this magnitude be made only after lawful, transparent and meaningful consultation

NOTKUP urges the Inquiry to absorb the foregoing evidence and to take it fully into account when considering whether this project, in its current form and on the basis of its current process, can be justified and recommended for consent.

Eileen West  
for NOTKUP  
April 2026