

Objection to application ECU00006008

Introduction and Summary

This response concerns SSEN's application for the Spittal – Loch Buidhe – Beauly 400 kV overhead line link.

This response is the joint response of Contin Community Council, Strathpeffer Community Council, and Marybank, Scatwell and Strathconon Community Council, referred to jointly as 'we' or 'us' herein.

Although we accept the need to move to electricity sourced largely from low-carbon sources, and appreciate the need to be able to transmit electricity generated in the north of Scotland to further south, we consider the present proposal to be unsatisfactory in many ways, and therefore we object to it as proposed.

The grounds for our objection are:

- Inadequate justification of need;
- Inadequate assessment of options as required by law;
- Poor public engagement during the option selection process;
- Significant environmental impacts that cannot be mitigated, or which are insufficiently mitigated;
- There will be unacceptable cumulative impacts when this scheme is combined with other schemes for which the application process has commenced;
- There is little socio-economic benefit to The Highland Council region during construction and effectively none during operation. We see a risk to our critically important tourist sector;
- There is little direct economic benefit to the UK during operation, although the connection may have a role to play in electricity decarbonisation.

These grounds are expanded below.

Further, we note that the utility of the proposed scheme depends on permission being granted by The Highland Council for substations at Banniskirk, Carnaig and Fanellan, and permission being granted by ECU for an overhead line to Blackhillock. There is no precedent for such a combined approval process. At best, only conditional permission should be granted until all necessary consents are in place.

The Applicant has also asked for deemed consent for ancillary works. These ancillary works would ordinarily require planning consent from The Highland Council and would require the input of Traffic Scotland as a statutory consultee. We doubt that The Highland Council has the time and resources to assess these consents on the timescale of responding to this Application, and therefore it would be unsafe for full planning permission to be deemed consented for these ancillary works.

Justification of need

The rated generation capacity of wind turbines currently installed north of Beauly exceeds the capacity of the present transmission system. This has resulted from an inappropriate approach to consenting generation. Nevertheless, the generation capacity exists, so a solution is now needed to increase the amount of electricity transmitted south and to reduce curtailment payments.

The applicant has proposed a 400 kV, double circuit overhead line, 3 conductors/phase giving approximate capacity 6 GW, on steel lattice towers with 6 arms, along a specific route. Double circuit is a legal requirement.

There is a requirement under EIA regulations to demonstrate that this has the least environmental impact of feasible options.

There is also a requirement to be consistent with the various policies given in NPF4, of which policy 11 is particularly relevant to this objection.

We accept the various policy statements in favour of renewables generation, but these do not in themselves demonstrate that the present project is needed.

None of the documents referred to in the Application specify the quantity of power transmission requirement from Spittal to Beaulay, only that reinforcement is needed, and a possibility of 400 kV is suggested. A total of 21 GW offshore is considered but no precise location given; no numbers are given for onshore. Thus demonstration of the capacity requirement appears to be a task for the Applicant and no calculations to demonstrate the capacity need have been provided.

The nature of wind turbines is that they produce their rated capacity for only a very small percentage of the time, possibly <5%, the average generation is around 30% of capacity onshore, 50% of capacity offshore, and some of the time they produce no electricity. Generation is strongly skewed to lower powers. If a transmission network is built to accommodate rated capacity, it will be under-used most of the time. This has not been discussed.

Given the variable output, it can be anticipated that an optimal solution (least lifetime cost) to the problem of transferring electricity south will involve a combination of transmission capacity, storage to manage short periods of high generation, and possibly occasional curtailment. There is no evidence presented that this has been considered or explored.

The north of Scotland is windy and there is clearly the potential to generate more electricity both onshore and offshore. A total of 21 GW offshore is considered; no numbers are given for onshore. Currently, the demand for this electricity is not in the Highlands, or even in Scotland, but further south. The UK's spatial energy strategy is a work in progress, and Scotland has no adopted energy strategy. There is therefore currently no firm basis for predicting future transmission needs from the north of Scotland. Is 6 GW needed, or will it be insufficient in the future? Building towers capable of supporting 4 conductors/phase would seem to be a reasonable precaution, even if these cables are not fitted now. Is the proposed route expandable if necessary?

There is yet no overall design for a workable UK electricity system sourced largely from intermittent renewables. The Highland Council is in the process of producing a new development plan, and a wider transition away from fossil fuels is changing the UK's energy requirements. Given the huge strategic uncertainty at the time the design began to crystallise, we consider that flexibility should have been an attribute during optioneering.

Option selection

As discussed in the Application, option selection is a multi-stage process. It might be expected to proceed as:

0. Technology selection
1. Corridor selection

2. Route selection
3. Alignment selection
4. Micro-siting

Technology selection

The need to balance transmission capacity and other approaches is discussed above.

The decision AC OHL v. other technologies is based primarily on the 2012 Parsons Brinckerhoff report. Converter technology and process have moved on since 2012; in particular VSC technology is now available at the required voltage and has a smaller site footprint than LCC technology. The 2025 update of the PB report incorporates advances in VSC technology and also multi-point DC lines. Neither report considers a DC UGL, and both reports exclude social and environmental costs.

DC technology is clearly not unaffordably expensive, because much of the network envisaged by HND will be HVDC undersea.

At paragraph 4.3.4, the Application references EN-5, which was issued in final form in 2023, whereas the application mentions the 2021 draft. Although 2.9.20 of EN-5 states that the starting strong presumption should be in favour of overhead lines, many exceptions are discussed in subsequent paragraphs. These appear not to have been considered in the application. It is unclear on what costing information EN-5 was based.

We note that NPF 4 policy 11 section (e) contains the words “In the case of proposals for grid infrastructure, consideration should be given to underground connections where possible.”

We accept that undergrounding at 400 kV AC is not a viable option. Aside from the electrical difficulties, installation of 400 kV AC cabling underground would result in a degree of temporary devastation that we would find unacceptable.

It is unclear to us that the total cost advantage of AC OHL v. HVDC UGL is so obvious that no modern and project-specific costing is needed to justify selecting the OHL option. No outline comparative costing information is provided in the Application. This comparative costing would have to consider both capital and operational costs, which would take into account the lower fault frequency but higher repair cost of underground cables in a proper, quantitative way. UGL technology has the obvious advantage of eliminating most of the visual impact, although the clear corridor remains.

IF it is accepted that OHL technology is the best solution and that 6 GW transmission capacity is needed (noting that we do not accept that a clear case has been made for these premises), then there is the fundamental decision as to whether this can be achieved by upgrading or replacing the lines along the current 132/275 kV corridor, or whether an entirely new route is the better option. We see no evidence presented that this question was considered.

Corridor selection

We accept that the eastern corridor is not viable

We note that the existing 132/275 kV line does not follow any of the corridors identified at the corridor selection stage, suggesting that the identification of corridors is overly restrictive.

Route and alignment selection

We appreciate that, given the length of the route, an element of automation at the start of the routing process is a reasonable step. Automated processes will be successful only if the input information is appropriate.

We note that proximity to people is now listed as an attribute (p4.4.5 of the Application); this was not evident during the public consultation period and caused concern. Capital and operational costs are now listed separately as attributes, which we would expect to see, but it is unclear how these were used during option selection.

We consider that the RAG methodology used for route and alignment selection is inappropriate for the level of complexity of this project. It can be very useful in screening out options that are obviously unsuccessful (mainly red), or identifying a clearly preferred option (entirely green), but it provides no transparent means of resolving conflicting attributes in a transparent and repeatable way. The public were not involved in scoring the options, so we have to assume that weighting was applied subjectively by SSEN employees who are anonymous and who may not be familiar with the project area.

The document “Routeing Consultation Document Spittal – Loch Buidhe - Beauly 400 kV OHL Reinforcement August 2023” appears to be the critical record of the scoring used. We were unaware of the existence of this document until the submission of this Application, despite asking questions of SSEN that are answered in this document.

There are inconsistencies in the assessment tables in this document that detract from confidence in its reliability and therefore relevance to decisions that have been made.

We therefore conclude that, although an optioneering process occurred, we have no confidence that it has produced a trustworthy outcome.

Public engagement

SSEN undertook a number of public engagement events that exceeds the requirements of the relevant guidance. They were responsive in arranging additional events when requested. However, the nature of the engagement events was very much ‘decide and defend’.

It was clear from the beginning that routeing from Srath Sgitheach to Fanellan was challenging, with archaeology, population both clustered and scattered, steep slopes and protected areas to consider. Any option in Sections D and E was going to be ‘least worst’ rather than ‘best’. We sought repeatedly to collaborate with SSEN to determine the route through this area, but without success. This is a huge decision that will affect our area for a generation or more; it is ENTIRELY UNACCEPTABLE that we were excluded from this decision-making.

During discussions with SSEN, alternative routes between Strathpeffer and Aultgowrie appeared. This appears to have been an informal process and we were not involved in drawing the lines. As drawn, it is clear that the routes are problematic and no attempt was made to refine them. The alternative routes were rejected by SSEN as being ‘worse’ than their preferred route, but we were left feeling that the whole process was unsatisfactory, again without any attempt to collaborate, despite our asking.

Thus, we regard the ‘consultation’ phase as a failure.

Environmental impact

Environmental impacts as listed in the non-technical summary are summarised in Table 1. Categories where we believe that a significant adverse impact remains, despite mitigation attempts, are highlighted. Residual impacts remain for most of the categories. Commentary is presented below.

Table 1 – Summary of environmental impacts

Receptor	Impact significance	Mitigated?	Findings agreed?
Landscape and visual	Significant adverse	No	Yes
Residential visual amenity	Threshold not breached	No	No – considered significant
Ecology and nature	Significant adverse	No	Yes
Bats	Significant adverse	No	Yes
Ornithology	Small	Yes	We consider impact under-estimate and mitigation inappropriate
Water environment	No significant effects	Yes	Yes
Geological environment	Locally significant	Yes	Yes
Cultural heritage	Significant adverse	No	Possibly even more significant
Woodland – ancient and broad-leaved	Significant adverse	No	Yes
Commercial forest	Significant adverse	Yes	Yes, but mitigation is outside our area so a nett loss to us
Traffic and transport	Significant adverse	Yes	No – timing may be altered, but no reduction in traffic load
Noise and vibration	Significant adverse	Yes	Yes
Tourism	Not significant	No	No – considered significant
Recreation	Significant adverse	Yes	Insufficient mitigation

It can be seen that there are five attributes or sub-attributes where the Applicant considers that there is a Significant Adverse impact in the context of the EIA regulations, and a further five where we disagree with the Applicant and consider the impact to be Significant Adverse.

Landscape and visual

We note no mention of the Holford rules in this chapter, nor any documented attempt to reduce skyline impacts. There are lower-profile cable support structures than the standard UK-pattern lattice tower, which could be used for skyline crossings.

Cultural heritage

We are aware that there is much archaeology in Srath Sgitheach that is not formally documented, and the possibility that more is undiscovered. Estimated impact, already identified as Significant Adverse, is therefore likely to be under-estimated.

Traffic and transport

Condition of A835 (p14.4.32). We would dispute the assessment of this road as ‘good standard’. It is good standard only as far west as the entrance to Contin, beyond which it falls below this standard, being narrow for a trunk road and with very poor sighting distances and a double bend in the village. The road beyond Craigdarroch has been called ‘the cork-screw road’. The speed limit

through Contin is now 20 mph. Footway provision through Contin is narrow, variable and not all parts of the community are accessible by connected footway on a consistent side of the road; crossing is necessary. The village services are on the opposite side of the road from most of the population.

Note that NC500 cyclists are required to use the A835 road – there is no cycle track from Maryburgh roundabout through Contin, and only a very short section beyond as far as Craigdarroch. Local cyclists actively avoid the A835 between Contin and Garve, considering it unsafe.

We note that traffic along the A835 east-bound is episodic as a result of the Stornoway ferry, and that the road reaches capacity as a result. Should the A835 be blocked for any reason, the next shortest route to locations beyond Contin requires a detour of up to 100 miles along roads not suitable for all traffic.

The A834 is height limited (4.04 m) between Strathpeffer and Dingwall.

Moy Bridge, over the River Conon near where the A832 joins the A835, is single track and has a weight limit of 7.5 te MGW, thus excluding most goods vehicles. This road floods and is closed in wet weather, depending on SSER operations, necessitating a detour through Dingwall and Muir of Ord. Our communities would welcome improvement of this bridge.

Achonachie Road in Marybank has footways and lighting for only a short distance to the Jubilee Hall. The road is single track with passing places and can be busy at times with goods vehicles and also traffic servicing SSER assets. It is the main access route to the whole of Strathconon. The back road from Marybank to Muir of Ord is also single track with sparse passing places and has a tight bend. Both of these roads have surfaces in poor condition.

At 14.4.46, Table 14.26, the description of Marybank is wrong, suggesting confusion with Maryburgh. Marybank has a school, a village hall, but no shops or pedestrian crossing. It has a right-angle bend at a junction and a 20 mph speed limit.

At p14.5.10, we disagree fundamentally with the assessment of severance for Location 20.

Location 20 is in an unpopulated area so there is no severance, but this location is a surrogate for the village of Contin, where there is already a severance issue. Any increase in HGV traffic is significant. The Minor categorisation of significance of effect is based on the total traffic increase of 3%. However, the increase in HGV traffic is 40% and we regard this as being relevant. The nature of the road is such that there is very limited opportunity for SE-bound traffic to overtake an HGV and therefore most HGVs will have a tail of lighter vehicles. Assuming that the HGVs are active for only 12 h/d, the estimated load is ~1/3 minutes. Our own traffic count indicates that the current HGV load is ~20 vehicles/h, and thus this project is expected to double the HGV frequency – this is in line with the Applicant's estimate. So the overall result is a HGV every 1.5 minutes on average. Given the stochastic nature of traffic, this is going to make crossing the road a challenge. The cumulative effect of this proposal combined with other proposals must also be considered.

We consider that the mitigation measures proposed will be only partially successful in minimising the severance issue through Contin – the traffic load is unaffected.

Although the expected total traffic increases through Strathpeffer and Marybank are small, the increases in HGV traffic are substantial and will be very noticeable. School children need to cross the A834 in Strathpeffer and there is no longer a crossing warden.

Paragraph 14.3.35. Our recollection is that there was a fatal accident on the A835 between Contin and Garve within the last 10 years, 3 killed. Another accident in 2023, which is still leading to alternate direction working because of the damage that was caused to the road and safety barrier, is not recorded. We must therefore doubt the accident statistics.

Many roads are in less than perfect condition before the start of work. Should further deterioration occur, we would expect the roads to be eventually reinstated to an 'as new' condition, rather than deliberately leaving a road in poor condition.

We are less sanguine than the Applicant about residual effects on traffic. Some changes to timing may prevent the worst of consequences, but an increase in traffic is still an increase in traffic, whenever it occurs.

Tourism

We agree that the likely effect of the construction works on the tourist and recreation facilities in the Contin/Strathpeffer area is likely to be Significant. This straddles Sections D and E.

On the basis of Table 16.2, we would classify the sensitivity of Torrachilty Forest as High and Strathpeffer as Medium. On the basis of Table 16.3, we would regard the magnitude of change to Torrachilty Forest during the construction phase as Medium and to Strathpeffer as Low. On the basis of Table 16.4, we would regard the effect on Torrachilty Forest as Major and therefore Significant.

Note – the name Torrachilty Forest appears on no maps. We assume that this name is intended to refer to the contiguous block of woodland to the east and north of the A835, also called Contin Forest, accessed from the Forest and Land Scotland car park and distinct from Torrachilty Wood to the west of the A835, which is unaffected by the proposal.

At several places, e.g. 16.5.72 and 16.7.69, the effect on tourists is described as transitory and therefore the impact is low. The whole visitor experience is dynamic but it is the bad parts that stay in memories. We do not think that being transitory necessarily downgrades the significance of an adverse effect.

The Applicant's socio-economic report (section 5.2.3) states the tourism in The Highland Council area supports ~17 000 jobs (13% of employment) and it is therefore an important contributor to the local economy. Away from Inverness, near where most commercial activity is located, the significance of tourism increases.

The BiGGAR report attempts to compare wind farm development and tourist employment. Correlation does not imply causation, and it is not possible to assess what the growth in tourism employment would have been in the absence of wind farm development. Other literature paints a different picture and it would seem that at least some visitors would be discouraged by wind turbines (https://www.climatexchange.org.uk/wp-content/uploads/2023/09/the_impact_of_windfarms_on_scottish_tourism.pdf, <https://www.mdpi.com/2073-445X/10/7/693>). It would be perverse to suggest that wind farms and other electricity infrastructure are positive contributors to tourism. At best, the effect is neutral. We note that it is admitted that people are not fond of pylons (16.7.72). We are very concerned about the cumulative effect in our area, which may see a large increase in infrastructure very close to places visited by tourists. Even the loss of a small proportion of visitors is likely to have a significant negative effect on the local economy.

Recreation

Core paths RC10.03, RC45.05 provide a viable walking path from Contin to Strathpeffer, where some essential services are located: school, doctors, pharmacy, Post Office. There is no pedestrian alternative to this route. We would welcome an upgrade to parts of this route that are wet and muddy, but would require that the route remains open at all times. RC10.06 will also be affected by the WI HVDC link. We would hope that, after the completion of the works, a viable cycle route between Contin and Garve remains, obviating cyclists using a dangerous section of the A835.

We accept that there may be an adequate time window for works that would otherwise disrupt the Strathpuffer event to be completed and damage restored between events. However, what guarantees will be given? This event is of national significance. Aside from the annual event, the trails are used every week both by local residents and by visitors to the area. Although the Applicant has made no surveys, casual observation by us suggests that the forest car park is full of mountain bikers most weekends. The area is also popular with walkers at all times, especially to the View Rock and Rogie Falls. Disruption to activities will be difficult to avoid.

The draft Outdoor Access Management Plan (OAMP) is very much a placeholder only. We note that it is intended that the OAMP is a live document. How will updates be managed?

It is very light on the actions to be taken to minimise the inevitable disruption to access and is therefore unacceptable in its present form. Some operating rules are needed. We suggest, as a minimum:

- The core path through routes between Contin and Garve, and Contin and Strathpeffer, must remain open at all times, accepting that path users may need to wait for a few minutes at times. A banksman may be needed to manage safe access. A good example is how Scottish Water managed major trenching work along National Cycle Route 1 in recent years, maintaining open access for cyclists throughout the works although the roads were closed to motorised traffic.
- We suggest that works interacting with established MTB trails are suspended at weekends.
- The MTB tracks are used on Monday evenings throughout the year for formal training of young riders. Works would need to be suspended on Monday evenings to avoid unacceptable interactions.
- There needs to be an explicit plan to manage the Strathpuffer event.
- It will be necessary to liaise with local outdoor access interests over the reinstatement of paths, tracks and roads. The objective should be a perceived improvement over the current position, in line with Contin's draft Local Place Plan.

Socio-economic considerations

NPF4 policy 11 is significant here. It states:

a) Development proposals for all forms of renewable, low-carbon and zero emissions technologies will be supported. These include:

i) wind farms including repowering, extending, expanding and extending the life of existing wind farms; (ii) enabling works, such as grid transmission and distribution infrastructure;

...

Further, it states:

c) Development proposals will only be supported where they maximise net economic impact, including local and community socio-economic benefits such as employment, associated business and supply chain opportunities.

and

e) In addition, project design and mitigation will demonstrate how the following impacts are addressed and then lists 13 attributes to be considered.

We have considered the socio-economic report in this light. We noted in passing that it states that the proposed OHL only approaches the NC500 route at Badbea, and the nearest it gets to the NCN1 Dover to John o'Groats cycle route is several kilometres at Dingwall. In fact, the proposed OHL crosses the NC500 route near Contin, and it crosses the NCN1 route near Bonar Bridge, at which points the separations are zero. This does not build confidence in the report.

The economic assessment is presented in terms of Gross Value Added (GVA), apparently scaled from some starting number that is not stated. The numbers in Tables 6-1, 6-2 thus appear 'out of thin air'. It is impossible to verify them. GVA cannot easily be related to any perceived economic benefit to residents in the Highland region.

It is important to remember that the construction of the OHL is a short-term project, with expected duration ~4 years. During the operational phase, the line will generate negligible employment and therefore negligible benefit to the region.

Taking GVA at face value, the construction lifetime GVA is stated as £20.2M in Table 6-1, which can be compared with the annual GVA for the Highlands in 2022 of £6.96B given in section 5.2.7. The construction project is thus estimated to produce an increase in annual GVA for The Highland Council's area of around 0.1%, which is negligible.

At section 6.1.2, the report discussed the creation of 173 job.years employment in the Highland region. This is a very small amount of work. Assuming a 4 years programme, this is an annual employment rate of 43 for THC area. This is set in the context of an employed work force of 17 000 in just the tourism sector alone in the THC area (data from the report). Some of this work will be specialist workers (tower erectors, line riggers) likely to be imported rather than sourced locally. Thus the effect of the project on local employment is negligible, and in any event, it lasts only ~4 years.

The mechanism whereby this project will create jobs more widely across Scotland is not explored.

Outside the context of the Application, there has been discussion of a benefit of £200k/linear km of new transmission line, for affected communities. This will be £35-40M for The Highland Council area, as a one-off payment. This can be set in the context of the Council's annual budget of around £700M. The benefit is clearly a small sum.

At an early stage in developing this Application, the Applicant produced an accommodation strategy which included the development of new housing and the re-purposing of existing buildings. This appears to have been replaced by the concept of just two temporary construction camps, which will have no lasting value to the community. Given the length of the line, this will also generate additional traffic.

At section 6.4, the socio-economic report discusses community wealth building. Fine words are produced, but the sum of money mentioned is only £10M. This is very small in the context of regional needs, e.g. dealing with the fuel poverty associated with old housing stock. In practice, we have found the conditions attached to this funding onerous, and none of our three councils has succeeded in obtaining any of this money.

Potential value to the UK during the operational period arises from availability of electricity. But this project provides no electricity, it only conducts it. The value to the UK derives from electricity generation, over and above the fossil fuel generation it replaces. The value must not be double-counted. The project may be essential in unlocking value from electricity generation, but it does not add to the value of doing so.

It is noted that SSEN has overseas shareholders, including a 25% holding by Ontario Teachers Pension Fund. It will therefore export money from the UK in the form of dividends.

We conclude that there is negligible socio-economic benefit to our region, but it is clear that there are significant non-economic costs that are not mitigated. We conclude that the requirements of NPF 4 policy 11 are not met.

Cumulative impact

We agree with the Applicant that cumulative effects within the project are small.

However, Chapter 17 of the EIA completely fails to address inter-project effects, should all of the projects that are currently in the planning system come to fruition for Sections D, E. The arguments used in support of multiple wind farm and BESS developments in our area are similar to those used to justify the present proposal, *viz.* the need to transition to renewable power and it therefore has to be assumed that they will be consented by Scottish Ministers, despite local opposition. The cumulative result will be to change the area from being an area of rural villages, forest and mountains, to being the core of an electricity factory. It is difficult to argue that this is a positive development for tourism. It is possible to experience electricity factories much closer to England, avoiding the long journey to the Highlands. This change has not been planned, has not been consulted, and does not even provide any significant permanent employment.

Conclusions

- The need for the proposed development has not been demonstrated.
- It is not clear that the proposed route is optimal, as required by law.
- The proposed development will have adverse environmental effects that cannot be mitigated.
- There are substantial potential cumulative impacts that we regard as unacceptable.
- The socio-economic benefits during construction and operation are very small, and therefore we believe that the tests required by NPF 4 policy 11 have not been satisfied.

While we accept that major changes to the generation and transmission systems are required to meet climate targets, we consider that the current Application does not make an adequate case for the proposed development. We therefore **OBJECT** to this Application. The difficulty of making the case is compounded by the lack of a strategic quantitative framework from Government at the present time.

This application is part of a far wider programme that goes beyond the remit of any one consenting authority. We have joined with other community councils and have the support of our elected

representatives at Holyrood and Westminster in calling for a Planning Inquiry Commission to consider electricity infrastructure in the Highlands in the round. This is the biggest proposed change for our area since the hydro-electric schemes were built some 70 years ago. The hydro-electric schemes brought the advantages of electricity for the first time, but the electricity infrastructure development now proposed appears to promise nothing more than disruption and destruction; there is no lasting benefit for us.

Post-script

The 32 days allowed to community councils, although such a short time is permitted by law, is too short for a body supposed to be representative but run by volunteers to read such a large body of information and to consult on it. This is an important decision and should not be rushed to meet a politically expedient timescale. The UK's CO₂ emissions are around 1% of the total and a few years delay will make no global difference. Better to get it right than to cause environmental harm performing nugatory work incurring a cost to the public.

The presentation of the Application on the ECU web-site is appalling – it is an unstructured heap of documents in no particular order. This is seriously unhelpful when time is at a premium. We have instead relied upon the Application as hosted on the Applicant's web-site, which is logically structured and easy to navigate. Government must do better.