

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

Tealing to Kintore OHL proposal TRL-120-1

CHS Statement: Population & Human Health by Dr Iain Stirling

I am Dr. Iain Stirling. A scientist and medical doctor for 52 years. Retired from clinical practice but continuing to work in Scottish Social Security Tribunals.

Relevant evidence submitted in time by local people has been excluded, even though far more information about the applicant's overhead line proposal has emerged since the original objections were made.

Communities facing the long-term consequences of this development have spent countless unpaid hours researching its impacts, yet important contributions are being dismissed on procedural grounds. This risks undermining confidence in this Inquiry and in whether local voices are genuinely being heard.

I hope my own contribution, however limited, will still help the Reporters better understand the real impacts on local people and communities.

I am speaking today to raise serious and urgent public health concerns regarding the proposed TKUP project—specifically the overhead line design.

This is not a routine proposal. It is infrastructure on an unprecedented scale. The pylons—up to 70 metres high—would carry around 6 GW of electricity, roughly double Scotland's current usage at any one time. This would be the most powerful overhead transmission line ever proposed in Scotland.

In my submission, the application before you is fundamentally flawed.

There are five **critical** failures.

First — the Environmental Impact Assessment is legally deficient.

Population and human health—explicitly required under the 2017 Regulations—have been deliberately scoped out. This is a fundamental failure. You are being asked to make a decision without the information the law requires.

Second — no Health Impact Assessment has been carried out.

There is no proper evaluation of impacts on physical, mental, or social wellbeing. In January 2025, the Director of Public Health Scotland confirmed that it is the responsibility of SSEN, as the transmission operator, to produce a human health and population impact assessment. This was “following advice from our Scottish Government colleagues”. No detailed and specific Health Impact Assessment has been done.

Third — the applicant's EMF evidence is unreliable.

The compliance report is presented in place of proper health assessment, yet it contains inconsistencies and apparent errors.

Of greater concern, the applicant's own scoping document and Environmental Impact Assessment rely on the NIHP CRCE as an authority on updating EMF health evidence. That body ceased to exist in summer 2021, wholly replaced by the UK Health Security Agency.

It follows that this application has not been updated with the latest scientific evidence. Confidence in the reliability of the evidence before you is therefore compromised.

There is a growing body of recent research linking long-term low intensity EMF exposure with increased risks of serious illness, including childhood leukaemia. Uncertainty remains; however the pattern is consistent, and risks are observed below current UK safety limits.

Fourth — the human impact is already being felt.

Communities along the route are experiencing severe stress, anxiety, and financial harm. Homes are harder to sell, and people feel trapped.

The applicant quotes the WHO definition of health as including physical, mental, and social wellbeing, yet these impacts have not been properly assessed.

Fifth — the precautionary principle has been ignored.

Where credible evidence of risk exists—particularly to children—and uncertainty remains, action should be taken to prevent harm. Other countries have adopted stricter limits and safer alternatives. Here in the UK, we continue to have the worst and most lenient EMF exposure limits in Europe.

This proposal is not just about infrastructure. It is about people—their health, their homes, and their future.

You are not being asked to consider theoretical risks, but real and credible concerns supported by law, science, and lived experience.

The absence of certainty is not a justification for inaction. It is a reason for caution.

A responsible and lawful approach would require:

- A full and independent Health Impact Assessment (advised by PHS).
- Proper consideration of underground or subsea alternatives

These are truly planning matters, not the reserved province of another regulatory régime. This application cannot be considered robust, lawful, or safe.

To proceed would be a failure to properly discharge your duty to protect public health.

Scoping out Population & Public Health is, in my opinion, Morally abhorrent, Medically & Scientifically astonishing. There is no ethical defence for doing this.

Dr Iain Stirling 11.05.2026.