



CLEVE HILL SOLAR PARK

DCO APPLICATION REFERENCE EN010085

STATEMENT OF COMMON GROUND (SOCG)

MAY 2019

BETWEEN:

- 1) CLEVE HILL SOLAR PARK LTD; AND**
- 2) PUBLIC HEALTH ENGLAND**

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1 INTRODUCTION

1. This Statement of Common Ground (SoCG) has been prepared in relation to an application (the Application) made to the Secretary of State (SoS) for the Department for Business, Energy & Industrial Strategy (BEIS), under section 37 of the Planning Act 2008, seeking a Development Consent Order (DCO) for the Cleve Hill Solar Park (hereafter referred to as the Development). The Application was accepted by PINS on 14th December 2018. Application documentation is available online [here](#).
2. This SoCG is being prepared as a means of clearly stating any areas of agreement and disagreement between the Applicant and Public Health England (PHE) which are set out in section 2.
3. The SoCG is supported by the following appendices:
 - Appendix A: 400 kV Cable Connection Indicative Detail; and
 - Appendix B: Public Health England Response (20 May 2019).

2 AGREEMENT

4. Confirmation that Table 2 of this SoCG reflect the points of agreement at the stated date is provided in Table 1.

Table 1: Confirmation of Agreement

Date	Signatory	Signature
<i>See Appendix B</i>		

3 PHE COMMENTS

Table 2: PHE Comments

PHE Comments	Applicant Response	Status (PHE to complete)
<i>Comments</i>	<i>Applicant's response</i>	<i>E.g., Agreed / Not Agreed / N/A</i>
<p>Relevant Representation, PHE-1</p> <p>Thank you for your consultation regarding the above development. Public Health England (PHE) welcomes the opportunity to comment on your proposals at this stage of the project and can confirm that:- We have chosen to register an interest with the Planning Inspectorate on this occasion. We would like to point out that a question regarding the EMF health impact assessment i.e. characteristics of the proposed cable, that was raised by us at the Section 42 stage has not been addressed by the applicant. Please do not hesitate to contact us if you have any questions or concerns.</p>	<p>Appendix 3 (page 74) of the Consultation Report (PINS reference APP-023) includes a response to the comment raised by Public Health England in the Section 42 consultation response.</p> <p>Additional detail is also provided at Section 5.4.3 of Chapter 5 - Development Description of the ES (PINS reference APP-035), with the route shown in Figure 5.9 (PINS reference APP-053).</p> <p>A more detailed assessment of the potential for EMF impacts as a result of the likely characteristics of the 400 kV cable connection than was included in the Preliminary Environmental Information Report is included in Section 17.4.4 of Chapter 17 - Miscellaneous Issues of the ES (PINS reference APP-047).</p> <p>PHE requested a statement to confirm that the proposed cable has similar characteristics, such as number of circuits, maximum and typical current flow (kA), phase separation and depth of burial. The Applicant acknowledges that greater clarity could be provided and this is included in this SoCG, in Appendix A.</p> <p>Section 17.4.4 of Chapter 17 - Miscellaneous Issues of the ES uses National Grid data for a</p>	<p><i>See Appendix B</i></p> <p><i>See Appendix B</i></p>

PHE Comments	Applicant Response	Status (PHE to complete)
	<p>400 kV cable connection with similar characteristics to that of the Development. A table showing a direct comparison between the indicative Development 400 kV cabling characteristics, and the National Grid 400 kV example is provided in Appendix A to this SoCG, with a supporting indicative drawing. The table shows that maximum loading will be approximately 15% of that of a National Grid cable, so EMF generated under maximum load would also be c. 15%.</p> <p>Table A1 in Appendix A shows that the National Grid example 400 kV cable characteristics provided in the ES assessment are precautionary compared to the Development characteristics, and therefore the EMF effects of the Development's 400 kV connection are likely to be similar, or of a lesser magnitude than those assessed in the ES.</p>	
	<p>The additional information provided in this SoCG does not affect the conclusions of section 17.4.4 of Chapter 17 - Miscellaneous Issues of the ES that:</p> <p><i>" Table 17.3 demonstrates that even directly above the cable under maximum load, neither the occupational or public limits will be breached.</i></p> <p><i>The exact cable route is not known but the nearest residential receptor is located more than 100 m from the likely route of the underground cable. Due to the magnitude of</i></p>	<p><i>See Appendix B</i></p>

PHE Comments	Applicant Response	Status (PHE to complete)
	<i>effect upon the receptors, in accordance with ICNIRP exposure limit values, EMFs will have no effect on local residents therefore the effect is not significant in terms of the EIA Regulations."</i>	
PHE Section 42 response We have no further comments other than it is noted that the EMF health impact assessment depends to a large extent on a particular cable example taken from a WHO report (Table 17.1). Please state whether the proposed cable has similar characteristics, such as number of circuits, maximum and typical current flow (kA), phase separation and depth of burial.	The information provided in the Application and in this SoCG, Appendix A, forms an adequate EMF Health Impact Assessment and no further information is required.	<i>See Appendix B</i>
N/A - Rule 6 Letter	<p>The Examining Authority has requested that all of the SoCGs should cover the Articles and Requirements in the draft DCO.</p> <p>Any Interested Party seeking rewording of an Article or Requirement should provide the form of words which are being sought in the SoCG.</p> <p>If any comments or rewording of the Articles or Requirements is suggested by PHE, please address here or confirm that PHE has no comments on the draft DCO.</p>	<i>See Appendix B</i>

APPENDIX A – 400 KV CABLE CONNECTION INDICATIVE DETAIL

Table A1 - Comparison of National Grid example 400 kV cable characteristics and Cleve Hill Solar Park indicative 400 kV cable characteristics

400 kV Cable Characteristics	Cleve Hill Solar Park	National Grid Example Used in the ES Assessment
Voltage	400 kV	400 kV
Specifics	Underground Direct Buried / Ducted	Underground Direct Buried
Phase Separation	450 mm (indicative)	500 mm
Depth of Burial	1,050 mm (indicative)	900 mm
Maximum Load	Approximately 0.6 kA	4.7 kA
Typical Load	Approximately 0.06 kA (highly variable annually, diurnally etc.)	0.4/0.6 kA

APPENDIX B – PUBLIC HEALTH ENGLAND RESPONSE (20 MAY 2019)



Public Health
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20th May 2019

Dear Mr Bird

**Nationally Significant Infrastructure Project -
Cleve Hill Solar Park Project - Statement of Common Ground EMF Health Impact
Assessment**

Thank you for drafting a statement of common ground (SoCG) relating to the above development. Where possible, Public Health England (PHE) prefers to provide comments in the form of a letter rather than a SoCG.

We replied to earlier consultations as listed below and this response should be read in conjunction with that earlier correspondence.

Request for Scoping Opinion	9 January 2018
Public Consultation (Section 42)	12 July 2018
Registration of Interest	24 January 2019

We received a copy of the draft SoCG (dated May 2019) on the 3 May 2019 and we can confirm the following:

1) Matters with which PHE is in agreement

We can confirm that the applicant's responses provided in Table 2 of the SoCG address our comments to the Registration of Interest consultation and Section 42 response and that we are in agreement with them.

Table A1 in the Appendix A now provides sufficient indicative technical details about the 400 kV cable such that we are content with the response. In particular, the maximum and typical electricity load current is likely to be substantially smaller than that of the National Grid cable example provided in the Environmental Statement and therefore the maximum and typical magnetic field

are likely to be correspondingly lower.

2) Matters not agreed

We can confirm that there are no matters not agreed between the parties.

Yours sincerely

On behalf of Public Health England

nsipconsultations@phe.gov.uk

Please mark any correspondence for the attention of National Infrastructure Planning Administration.