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Your Ref: EN010092  
Our Ref: CIRIS 56910

Ms Tara Barratt  
Senior Health Impact Consultant  
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22<sup>nd</sup> March 2021

Dear Tara

**Nationally Significant Infrastructure Project  
Thurrock Flexible Generation Plant Project PINS reference EN010092  
Pre-Hearing Statement of Common Ground Request**

Thank you for meeting last week to discuss the proposed Statement of Common Ground (SOCG). As discussed, Public Health England (PHE) does not typically sign the statement of common ground document but prefers to provide our comments in the form of a letter. This has always been acceptable to the Planning Inspectorate (PINS)

Further to our meeting I can confirm that PHE has not identified any outstanding matters and agrees the following statements:

Assessment of health and wellbeing	The assessment of human health has used a generally appropriate methodology and has assessed the relevant health pathways.
Air pollution	<p>Health impacts from the emission of particulate matter and nitrogen dioxide have been appropriately assessed within the air quality and human health chapters.</p> <p>Reducing public exposures to non-threshold pollutants (such as particulate matter and nitrogen dioxide) below air quality standards has potential public health benefits. We support approaches which minimise or mitigate public exposure to non-threshold air pollutants and address inequalities (in exposure) and encourage their consideration during site design, operational management, and regulation.</p> <p>While the relative change in concentration and exposure are minimal, PHE encourage ongoing efforts to reduce emissions to air wherever possible.</p> <p>The applicant will be required to implement Best Available Techniques (BAT) through the environmental permitting process, and at the time of applying for the permit will identify these through a BAT analysis. This would determine the air pollutant control system to be fitted to reduce changes to air quality to as low as reasonably practicable.</p>

Accidents and emergencies	<p>Potential accidents and emergencies have been identified and appropriate mitigation measures listed against each.</p> <p>As the proposed development would be a regulated facility through The Environmental Permitting Regulations (2016) and The Environmental Permitting (England and Wales) (Amendment) (EU Exit) Regulations (2019), and due to the designed-in mitigation and control measures discussed in Appendix 2.2, major accidents and disasters giving rise to significant effects are not considered likely.</p> <p>Though a technology provider has not been selected at this stage, batteries would not be lead-acid, and are most likely to be lithium-ion. The hazard characteristics of these batteries will be accounted for through design and include appropriate mitigation to manage risk.</p>
Health inequalities	A precautionary approach was applied to the human health assessment by assuming that the entire population of Thurrock are of high sensitivity to changes in health pathways, including access to green space.
Deprivation levels in Walton Common and Zone E	<p>Walton Common and Zone E are uninhabited.</p> <p>The exchange common land would be accessible to the same population that can currently use Walton Common for recreation and physical activity as it is located adjacent to Walton Common but more conveniently accessible (with no railway crossing required).</p> <p>Overall, there will be no change in the population with access to the common land for recreation and physical activity, nor their deprivation level; and no disproportionate impact on populations with differing levels of deprivation. For this reason, it is not considered appropriate (or meaningfully possible, given that these pieces of land are uninhabited) to provide population deprivation levels specific to these land parcels in relation to human health.</p>
Cycle parking	Staff cycle parking should be provided for the proposed development. The details of this can be confirmed through discharge of Requirement 4(1)(c) in the DCO (PDC-009) under the approval of the local planning authority.

Yours sincerely

Allister Gittins  
On behalf of Public Health England  
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*Please mark any correspondence for the attention of National Infrastructure Planning Administration.*