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Security
Agency

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Your Ref: EN010114
Our Ref: CIRIS 58602

Dr Richard Lowe
Director, E&GE Energy Sector Lead
AECOM
2 City Walk
Leeds
LS11 9AR

22nd April 2022

Dear Dr Lowe,

**Nationally Significant Infrastructure Project
Keadby 3 Low Carbon Gas Power Station, DCO, Statement of Common Ground,
PINS Reference EN010114**

Thank you for your consultation regarding the above development. Please note that the UK Health Security Agency (UKHSA) request views from the Office for Health Improvement and Disparities (OHID); and this response is sent on behalf of both UKHSA and OHID.

With regards to the Statement of Common Ground (SoCG) (revision VP2.0, dated March 2022, received 8th April 2022), we note that we have replied to earlier consultations as listed below following receipt of an initial draft from yourselves on 10th December 2021 (VP1.0, dated December 2021).

- 11th January 2022
- 10th February 2022
- 24th March 2022

We have reviewed the updated SoCG (revision VP2.0, dated March 2022, received 8th April 2022) against our recommendations provided in the consultation responses (as detailed above) and also at the Registration of Interest stage. Please note, there are outstanding areas which the UKHSA cannot currently agree until the provision of further information. In addition, we are aware that the Examining Authority confirmed it was seeking views from all Interested Parties on whether the advice contained in the consultation responses from the UKHSA and/ or the Ministry of Defence would have had any bearing on the approach or findings of the Environmental Statement submitted with the application, in light of a clerical error (please letter from Planning Inspectorate dated 7th

March 2022- Rule 17, Request for further information), which may lead to further consultations with the UKHSA.

Please see detailed comments which are detailed in Appendix 1.

Yours sincerely,

On behalf of UK Health Security Agency
nsipconsultations@phe.gov.uk

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



Appendix 1. Statement of Common Ground, Position of Parties

Ref.	Relevant Rep. Matter	SSE Thermal and Equinor's Position	UKHSA's Position	Further Action Required
1	Section 3.0 Summary of Consultation; Table 3.1: Consultation Summary; Details described in row 'January 2021 (formal Stage 2 Consultation/response)'. 	<p>The SoCG states the following:</p> <p>'The UK Health Security Agency provided advice on construction impacts, cumulative impacts during construction and operation, impact and risk assessments, Air Quality Standards, amine product emissions and modelling, the proximity of residential properties to the water connection, discharge corridors, abnormal indivisible load route and permanent emergency access via Chapel Road and the assessment of potential impacts on these, asbestos risk and water assessments.</p> <p>The UK Health Security Agency sought clarity regarding works across different phases, receptor locations, the carbon capture process and equipment, process emissions, stack height, confirmation that potential Polycyclic Aromatic Hydrocarbons (PAH) emissions have been adequately scoped out if required and assessment years.</p>	<p>The UK Health Security Agency (as Public Health England) raised points in relation to Environmental Public Health and Health and Wellbeing. Environmental Public Health recommendations comprised the need for further assessment and clarity of cumulative and combined emissions and impacts, works across different phases and receptor locations. Further details regarding the water connection, discharge corridors, abnormal indivisible load route and public health impacts from wastes were also recommended.</p> <p>Specific feedback was provided for Air Quality Construction and Operational Impacts (including emissions from the carbon capture process and equipment, process emissions, stack height, confirmation that potential polycyclic aromatic hydrocarbons (PAH) emissions have been adequately scoped out); and land, water, incidents/accidents and electromagnetic field (EMF) assessments.</p>	SoCG to be updated.

		<p>The UK Health Security Agency recommended providing clearer and more accurate identification, reference and justification for selection of the human health receptors in the assessments.</p> <p>It was stated that emissions of particulate matter from all potential sources do not appear to have been assessed and clarification is needed in light of the potential for unabated emissions from the CCGT plant.'</p>		
2	<p>Section 3.0 Summary of Consultation; Table 3.1: Consultation Summary; Details described in rows dated March 2021, August 2021, 02 September.</p>	<p>SSE Thermal and Equinor have described consultation responses as being from the UK Health Security Agency.</p>	<p>Consultation responses would have been provided by Public Health England, as the UKHSA became operational in October 2021.</p>	<p>SoCG to be updated.</p>
3	<p>Section 3.0 Summary of Consultation; Table 3.1: Consultation Summary.</p>	<p>UKHSA notes that January 2022 is described as being the date of the last correspondence between SSE Thermal and Equinor; with the UKHSA.</p>	<p>Since January 2022, UKHSA has commented on a number of draft SoCGs and also received a 'Non-Statutory Consultation on the Proposed Changes to the Previously Submitted Environmental Statement', where the UKHSA provided a response on the 18th March 2022.</p>	<p>SoCG to be updated.</p>
4	<p>Section 4.0 Matters Agreed; Table 4.1 Row entitled 'Consultation'.</p>	<p>The SoCG states the following: 'A summary of pre-application consultation is contained in the Consultation Report (APP-030) and Appendix 16A: Population and Health Signposting (APP-096) in ES Volume II. It is agreed that the consultation summary in Section 3 of this SoCG provides an accurate record of consultation with the UK Health Security Agency/ Public Health England on application matters to date.'</p>	<p>UKHSA cannot agree to this statement. Please see information provided in references (rows) 1 -3 of this table</p>	<p>SoCG to be updated.</p>
5	<p>Section 4.0 Matters</p>	<p>The SoCG states the following:</p>	<p>UKHSA does not agree to the last paragraph.</p>	<p>SoCG to be</p>

	Agreed; Table 4.1 Row entitled 'Consultation'.	<p>'The Proposed Changes to the DCO include an increase in the height of the twin absorbers if they are to be used for the Proposed Development. The changes have been assessed in the ES Addendum including consideration of air quality effects. The revised air quality impact assessment shows that the increased stack heights for the twin absorbers slightly reduces the potential air quality effects on human health receptors although there is no change in the significance of predicted effects which remains negligible.</p> <p>Based on the above clarifications, it is agreed by both Parties that the issues raised by the UK Health Security Agency in their Relevant Representation have been appropriately addressed.'</p>	<p>UKHSA provided a response to the applicant on 18th March 2022 where we advised that we were unable to comment on the public health impact of the changes as we had not been provided an updated Air Quality Chapter (and associated technical appendices).</p> <p>UKHSA has not received any further documentation or reports since this time, therefore we cannot agree that 'Relevant Representation has been appropriately addressed'.</p> <p>Please see reference 8 of this table.</p>	<p>updated.</p> <p>Relevant reports to be submitted to the UKHSA for review.</p>
6	Section 4.0 Matters Agreed; Table 4.1 Row entitled 'Waste Arisings'.	<p>The SoCG states the following: 'It is agreed that no further comments were received from the UK Health Security Agency on waste arisings and their effects. Waste management is not part of the UK Health Security Agency remit.'</p>	<p>UKHSA's recommended wording is as follows: It is agreed that no further comments were received from the UK Health Security Agency on waste arisings and their effects. Waste management and compliance are not part of the UK Health Security Agency's remit.</p>	<p>SoCG to be updated.</p>
7	Section 4.0 Matters Agreed; Table 4.1; Row entitled 'Draft DCO, requirements and protective provisions'.	<p>The SoCG states the following: 'It is agreed that no changes are sought by the UK Health Security Agency to the draft DCO (APP-005), including requirements and protective provisions.'</p>	<p>UKHSA is no longer able to agree to this wording in light of proposed changes to the stack height (please see reference 5 of this table).</p> <p>As detailed in the UKHSA response dated 18th March 2022, we advised that we were unable to comment on the changes as we had not been provided an updated Air Quality Chapter</p>	<p>SoCG to be updated.</p> <p>Relevant reports to be submitted to the UKHSA for review.</p>

			(and associated technical appendices). UKHSA has not received any further documentation or reports since this time and as such, have been unable to provide an updated risk assessment. Please see reference 8.	
8	Section 5.0 Matters not agreed and next steps.	<p>The SoCG states the following:</p> <p>'5.1.1. There are no matters not agreed between the parties.'</p>	<p>We do not agree to this statement and have three points for consideration.</p> <p>1) It is not clear why previous text as found in the earlier SoCG version (VP1.0) has now been removed.</p> <p>We recommend that the following text be included:</p> <p>'UKHSA outlined that further air quality assessment may be beneficial in order provide further clarity on the process contribution to the overall EAL (Environmental Assessment Level) once the final licensor has been selected. A reappraisal of such operational effects would be undertaken post consent once the licensor is selected, and detailed design is completed. A subsequent permit update may be required following completion of the detailed design to be specific to the design measures to be applied and provide further detail on plant commissioning and start-up and air and water discharges as appropriate.'</p> <p>2) Further details regarding the assessment of public health impacts from the change in stack height remains outstanding (please see</p>	<p>SoCG to be updated.</p> <p>Relevant reports to be submitted to the UKHSA for review.</p>

			<p>reference 5 of this table).</p> <p>3) Any outstanding matters for which the UKHSA may be consulted on, in light of the clerical error (please letter from Planning Inspectorate dated 7th March 2022- Rule 17, Request for further information).</p>	
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