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Agency

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Your Ref: EN010114
Our Ref: CIRIS 58602

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

19th May 2022

Dear Sir/ Madam,

**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 VP3.0, dated April 2022, received 26th April 2022), we note that we have replied to earlier consultations as listed below following receipt of an initial draft from the applicant on 10th December 2021 (VP1.0, dated December 2021).

- 11th January 2022
- 10th February 2022
- 24th March 2022
- 22nd April 2022

We have reviewed the updated SoCG (revision VP3.0, dated April 2022, received 26th April 2022) against our recommendations provided in the most recent consultation response on the 22nd April 2022. We acknowledge some changes to the SoCG have been made following recommendations that were provided in references 2 and 8 (part 1 of UKHSA recommendation only) of Appendix 1 (dated 22nd April 2022). However, there remain several areas that the UKHSA cannot agree to, namely due to the lack of information included in the air quality assessment. Further details are provided in the following section as well as in Appendix 1 of this document.

Air Quality

Notification

We would like to confirm that the UKHSA was only notified of further updated air quality assessment reports (dated April 2022 and May 2022) being available for review upon receipt of the most recent SoCG on 26 April 2022, and we had not received a formal request to review these for an updated public health risk assessment at any point prior.

Public health risk assessment

UKHSA has subsequently reviewed the updated air quality assessment, including Chapter 8 and Appendix 8B in the report entitled '*Proposed Development Changes: Environmental Statements (ES) Addendum - Volume II (Chapters and Appendices)*'. This has confirmed that twin absorbers may be used for the removal of carbon dioxide, with the twin stack heights potentially reaching a maximum of 98.3m AOD. It is noted that modelling has been undertaken at the lowest release heights for this alternative option. It has been concluded in the report that due to reduced downwash, smaller dimensions and circular shape of the twin absorbers, when compared to the single absorber layout, the maximum worst-case results do not change from those originally reported in Chapter 8: Air Quality of the ES Volume I (Document Ref. 6.2.8) [APP-051].

However, UKHSA considers that insufficient information has been submitted in support of the public health risk assessment. We recommend that modelled outputs of concentrations of pollutants from stack emissions at human health receptors be provided in support of the conclusions in the above paragraph so that UKHSA can satisfy itself that the worst-case modelled data do not change from those detailed in the originally reported.

It is unclear why modelling has not been undertaken for a range of stack heights for the twin absorber scenarios to inform the public health impact assessment and stack design. Further justification for this approach is recommended. 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, address inequalities (in exposure), and maximise co-benefits (such as physical exercise) and encourage their consideration during development design, environmental and health impact assessment, and development consent.

In view of this, UKHSA is unable to agree to several items in the Statement of Common Ground nor sign this document. Further details are provided in Appendix 1.

It has been assumed that no further Environmental Statements will be submitted considering the clerical error (please refer to the letter from Planning Inspectorate dated 7th March 2022- Rule 17, Request for further information).

Yours faithfully

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
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 recommended providing clearer and more accurate identification, reference and</p>	<p>UKHSA had recommended (response dated 22nd April 2022) that the SoCG wording be updated with the following.</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> <p>We note that the wording of this section has not been</p>

		<p>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> <p>The UK Health Security Agency additional comments are provided in Appendix 2.'</p>	<p>changed. Instead, the reader is advised that additional comments from UKHSA are provided in Appendix 2.</p>
2	Section 3.0 Summary of Consultation; Table 3.1: Consultation Summary.	<p>UKHSA notes that for the row entitled 'January -March 2022' it is stated that comments on draft SOCG provided by UK Health Security Agency (refer to Appendix 1).</p>	<p>UKHSA 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 advising that 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>
3	Section 4.0 Matters Agreed; Table 4.1 Row entitled 'Consultation'.	<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 -2 of this table.</p> <p>Section 3 of the SoCG does not provide an accurate record of consultation due to the wording which has not been amendment.</p>
4	Section 4.0 Matters Agreed; Table 4.1 Row entitled 'Consultation'.	<p>The SoCG states the following: '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</p>	<p>UKHSA does not agree to the wording of this statement.</p> <p>UKHSA has reviewed the updated air quality chapters which confirm that the proposed change includes the potential use of twin absorbers, with maximum heights of the stacks extending up to 95.5m (AOD).</p>

		<p>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>We recommend that modelling be undertaken for a range of stack heights for the twin absorber scenario, with the modelled outputs of concentrations of pollutants from stack emissions at human health receptors being provided in support of the conclusions in the above paragraph.</p> <p>Please see reference 7 of this table.</p>
5	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>
6	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 not able to agree to this wording in light of proposed changes to absorbers and stack heights and the absence of sufficient information being provided in support of the air quality assessment.</p> <p>(please see references 4 and 7 of this table).</p>
7	Section 5.0 Matters not agreed and next steps.	<p>The SoCG states the following: '5.1.1. There are no matters not agreed between the parties.'</p>	<p>We do not agree to this statement.</p> <p>Further details regarding the assessment of public health impacts from the change in stack height and configuration (please see reference 4 of this table) are outstanding.</p>

