

# Cottam Solar Project

## Statement of Common Ground with the UK Health Security Agency

Prepared by: Lanpro Services

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## Issue Sheet

**Report Prepared for: Cottam Solar Project Ltd.  
DCO Submission**

### Statement of Common Ground

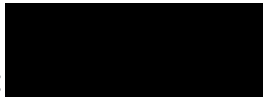
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Name: Matthew Smith

Title: Associate Environmental Consultant

**Approved by:**

Signature:



Name: Nigel Mann

Title: Director

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Date: June 2023

Revision: 0

Revision	Date	Prepared by:	Approved by:

## 1 Introduction

### 1.1 Purpose of this document

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared as part of the proposed Cottam Solar Project Development Consent Order (the Application) made by Cottam Solar Project Ltd (The Applicant) to the Secretary of State for Energy Security and Net Zero (the Secretary of State) pursuant to the Planning Act 2008 (PA 2008).
- 1.1.2 This SoCG does not seek to replicate information which is available elsewhere within the Application documents. All documents are available on the Planning Inspectorate’s website.
- 1.1.3 This SoCG has been produced to confirm to the Examining Authority (ExA) where agreement has been reached between the parties, and where agreement has not yet been reached. SoCGs are an established means in the DCO consenting process of allowing all parties to identify and focus on specific issues that may need to be addressed during the examination.

### 1.2 Parties to this Statement of Common Ground

- 1.2.1 This SoCG has been prepared by (1) Cottam Solar Project Ltd. as the Applicant and (2) UK Health Security Agency (UKHSA).
- 1.2.2 Collectively, Cottam Solar Project Ltd. and UK Health Security Agency are referred to as ‘the parties’.

### 1.3 Terminology

- 1.3.1 In the tables in **Sections 3 - 5** of this SoCG:
- “Agreed” indicates where the issue has been resolved.
  - “Not Agreed” indicates a final position, and
  - “Under discussion” indicates where these points will be the subject of ongoing discussion wherever possible to resolve, or refine, the extent of disagreement between the parties.

### 1.4 Topic Referencing for all matters

- 1.4.1 All matters agreed, under discussion and not agreed have been given unique references which relate to the topic matter. The referencing system is defined as follows:

Topic	Unique Identifying Code
Air Quality	AIR-XX
Socio-Economics, Tourism and Recreation	STR-XX
Other Environmental Matters	OEM-XX

## 2 Record of Engagement

### 2.1 Summary of consultation Summary of consultation

2.1.1 The parties have been engaged in consultation following the UKHSA relevant representation received in March 2023. A summary of the meetings and correspondence that has taken place between Cottam Solar Project and UKHSA in relation to the Application is outlined in **Table 2-1** and in ES Chapter 21: Other Environmental Matters (Table 21.5.2: EIA Scoping Comments and Responses) **[APP-056]**.

**Table 2-1 - Record of Engagement**

Date	Form Correspondence	Key topics discussed and key outcomes
24/02/2022	Scoping Opinion consultation	Response to Scoping Opinion of <b>C6.3.2.1 Environmental Statement Appendix 2.1 EIA Scoping Report Part 1 of 4 [APP-060]</b>
21/07/2022	Section 42 consultation	<p>UKHSA commented as follows:</p> <p>Air Quality</p> <p>Table 17.2 describes smoke levels from particulate matter concentrations. In addition to the information in table 17.2, the applicant should compare modelled outputs for their fire scenario to relevant UK air quality standards which are protective of health. We also recommend that, in addition to particulate matter, the applicant considers emissions of other substances associated with the development in the event of an accident or fire. i.e. what substances could be released from the batteries in the event of a failure and what products of combustion might be produced that would be different for this type of installation compared to other fires.</p> <p>Electro-magnetic fields</p> <p>UKHSA notes that electromagnetic fields have been scoped out of the Environmental Statement (ES) assessment, on the basis of the DCO application</p>

		<p>including a technical report that demonstrates that relevant design standards have been met for all cabling. UKHSA advises that the DCO technical assessment should be based on the voluntary codes of practice described on page 12-13 of the following advice document, which was also referenced in UKHSA’s response to the Scoping Consultation</p> <p>Population and Human Health Assessment</p> <p>It is noted that population and human health is being considered within existing chapters and not form a separate chapter within the ES. Given the current knowledge of the scheme and potential impacts this appears to be a proportionate approach. This should be kept under review as more information becomes available and a separate population and human health chapter may be justified as the assessments develop.</p> <p>Shared Cable Corridor</p> <p>We note the aim to co-ordinate with nearby energy schemes in relation to a shared cable corridor, which is welcome, and will be subject to a shared impact assessment contained within subsequent scheme ES submissions. This consultation, therefore, does not consider impacts from the cable corridor.</p> <p>Recommendation</p> <p>The impact assessment prepared for the cable corridor should receive suitable consultation with the local community and statutory consultees.</p> <p>Baseline Data</p> <p>The PEIR provides limited baseline health data, often referencing 2011 census data, to support any population or human health assessment. It does not consider local health priorities which have been identified within local Joint Strategic Needs Assessments (JSNA), Health and Wellbeing</p>
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		<p>Strategies or other local published current data sources<sup>1</sup>.</p> <p>Recommendation</p> <p>In terms of sources, we would draw your attention to the following: PHE Fingertips – Area profiles with various indicators on common mental disorders (including anxiety) and severe mental illness which can be benchmarked with other local areas as well as regional and national data Office for National Statistics - Wellbeing indicators Range of datasets related to wellbeing available including young people’s wellbeing measures, personal wellbeing estimates and loneliness rates by local authority.</p> <p>Advice could also be sought from the local public health team on additional local data and local health priorities.</p>
21/03/2023	Relevant Representation [RR-044]	<p>UKHSA commented: “We can confirm that: The battery energy storage system fire risk assessment has not used UK Air Quality Standards to consider potential impacts from a fire on site. We recommended at the Section 42 stage (21st July 2022) that health protective standards from the UK were considered in their assessment. This does not appear to have been addressed in the application. Please do not hesitate to contact us if you have any questions or concerns. ”</p>
13/05/2023	<p>Email proposing updated methodology.</p> <p>Re: Nationally Significant Infrastructure Project</p> <p>Cottam Solar Project</p> <p>Registration of Interest Response</p> <p>UKHSA ref: CIRIS63064 &amp; CIRIS59631</p>	<p>Cottam set out the proposed methodology to address the comments from the UKHSA relating to the solar panel fire modelling assessment and battery energy storage system fire impact assessment.</p>
19/05/2023	Letter with regard to methodology	<p>Confirmation was provided by UKHSA that they were generally happy with the</p>

	UKHSA ref: CIRIS63514	approach but recommended that assessment should be undertaken using UK Air Quality Standards.
8/06/2023	Call between Parties to discuss matters regarding Fire Impact Assessment methodology.	Discussion with Graham Urquhart ( <b>Principal Environmental Public Health Scientist</b> ) from UKHSA to present and agree upon the suitability of the methodology for additional BESS and Solar Panel Fire Impact Assessments.

2.1.2 It is agreed that this is an accurate record of the key meetings and consultation undertaken between (1) Cottam Solar Project Ltd. and (2) UKHSA in relation to the issues addressed in this SoCG.



### 3 Matters Agreed

Tables 3.1 to 3.3 below detail by topic the matters agreed with UK Health Security Agency.

#### 3.1 Matters Agreed (Air Quality)

Table 3.1

Topic	Sub-topic	Details of Matters Agreed
AIR-01 Air Quality	Baseline Conditions	The baseline conditions which are detailed in Section 17.5 of Chapter 17: Air Quality of the Environmental Statement <b>[APP-052]</b> are representative of the baseline site conditions.
AIR-02 Air Quality	Dust Management Plans	The methodology for the Air Quality Assessment and Dust Management Plans <b>[APP-141 to APP-143]</b> has been undertaken in accordance with IAQM's Guidance Document 'Guidance on the assessment of dust from demolition and construction' (2014) which is considered to be best practice.
AIR-03 Air Quality	Methodology and Assessment (Construction Vehicles)	As detailed within the Air Quality assessment <b>[APP-141 to APP-143]</b> , the proposed construction vehicle numbers will not exceed the relevant IAQM/EPUK thresholds e.g. 100 HGV Annual Average Daily Traffic (AADT), therefore there is no requirement for detailed construction air quality modelling and assessment has been scoped out of Chapter 17: Air Quality Environmental Statement <b>[APP-052]</b> . This approach is considered appropriate.
AIR-04 Air Quality	Methodology and Assessment (Operational Vehicles)	As detailed within the Air Quality assessment <b>[APP-141 to APP-143]</b> the proposed operational vehicle numbers will be limited and will not exceed the relevant IAQM/EPUK thresholds (e.g. 100 HGV Annual Average Daily Traffic (AADT), therefore there is no requirement for detailed air quality modelling and assessment has been scoped out of Chapter 17: Air Quality Environmental Statement <b>[APP-052]</b> . This approach is considered appropriate.

AIR-05 Air Quality	Mitigation	The proposed mitigation measures set out within Section 17.8 of Chapter 17: Air Quality of the Environmental Statement <b>[APP-052]</b> are acceptable.
AIR-06 Air Quality	Battery Energy Storage System (BESS) Fire Risk Assessment	It is agreed that there is currently no policy, legislation, or guidance which provides clarity on the methodology for undertaking a Battery Energy Storage System (BESS) Fire Risk Assessment.
AIR-07 Air Quality	Solar Panel Fire Modelling Assessment	Whilst the UKHSA recommend the use of the National Air Quality Standards, it is agreed that there are currently no specific policy, legislation, or guidance requirements on the methodology for undertaking a Solar Panel Fire Modelling Assessment.

### 3.2 Matters Agreed (Socio-Economics, Tourism and Recreation).

**Table 3.2**

Topic	Sub-topic	Details of Matters Agreed
STR -01 Socio-Economics, Tourism and Recreation	Baseline Conditions	The baseline conditions used for the socio-economic assessment which are set out at Section 18.5 of ES Chapter 18 <b>[APP-053]</b> are representative of the baseline site conditions.
STR-02 Socio-Economics, Tourism and Recreation	Methodology	The methodology used in the assessment of socio-economic, tourism and recreation impacts as set out in Section 18.4 of ES Chapter 18 <b>[APP-053]</b> is appropriate, given that there is no standard methodology for the assessment of socio-economic and associated impacts for EIA.

### 3.3 Matters Agreed (Other Environmental Matters).

**Table 3.3**

Topic	Sub-topic	Details of Matters Agreed
OEM -01 Other Environmental Matters	Human Health Baseline Conditions	The baseline conditions used for the human health assessment which are set out at Section 21.5 of ES chapter 21 <b>[APP-056]</b> are representative of the baseline site conditions.
OEM-02 Other Environmental Matters	Major Accidents and Disasters	The methodology for the assessment of major accidents and disasters which is set out at Section 21.6 of of ES chapter 21 <b>[APP-056]</b> is considered acceptable.

<p>OEM-03 Other Environmental Matters</p>	<p>Major Accidents and Disasters (fire safety)</p>	<p>The assessment undertaken and relevant mitigation measures provided with regard to fire safety as set out in Section 21.6 of ES chapter 21 <b>[APP-056]</b> and as set out in the Outline Battery Fire Safety Management Plan <b>[APP-348]</b> have been carried out in a robust and proportionate manner and are acceptable. The location and scale of the BESS is suitable with regard to impact on residential dwellings and publicly accessible locations.</p>
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## 4 Matters Under Discussion

**Table 4.1** below details the matters under discussion with UK Health Security Agency.

### 4.1 Matters under discussion (Air Quality)

**Table 4-1**

Topic	Sub-topic	Details of Matters Under Discussion
AIR-10 Air Quality	Additional Battery Energy Storage System (BESS) Fire Risk Assessment	The results of the BESS Fire Risk Assessment to be carried out using AERMOD dispersion model software to determine pollutant levels of NO <sub>2</sub> , Benzene, HCl, HF, and Particulate Matter (PM <sub>10</sub> and PM <sub>2.5</sub> ) are considered acceptable (to be discussed with UKHSA when results are available in July/Aug).
AIR-11 Air Quality	Additional Solar Panel Fire Modelling Assessment	The results of the Solar Panel Fire Modelling Assessment using ADMS software to determine predicted pollutant levels of NO <sub>2</sub> , Particulate Matter (PM <sub>10</sub> and PM <sub>2.5</sub> ), and Hydrogen Fluoride at sensitive receptors, and assessing against UK Air Quality Standards are considered acceptable (to be discussed with UKHSA when results are available in July/Aug).

### 4.2 Matters under discussion (Socio-Economics, Tourism and Recreation).

**Table 4-2**

Topic	Sub-topic	Details of Matters Under Discussion
STR-02 Socio-Economics, Tourism and Recreation	Cumulative Assessment	The cumulative assessment of socio-economic, tourism and recreation effects as set out in Section 18.10 of ES Chapter 18 <b>[APP-053]</b> has been carried out in a robust and sufficiently detailed manner and is therefore acceptable.
STR-03 Socio-Economics, Tourism and Recreation	Assessment of Likely Significant Effects	The assessment of project-specific socio-economic, tourism and recreation effects as set out in Section 18.7 and 18.9 of ES Chapter 18 <b>[APP-053]</b> has been carried out in a robust and sufficiently detailed manner. The assessment has duly considered effects on public amenity and recreation, and safety and human health, and is therefore acceptable.
STR-04 Socio-Economics, Tourism and Recreation	Proposed Mitigation and Enhancement Measures	The proposed embedded and additional mitigation and enhancement measures as set out in Sections 18.6 and 18.9 of ES Chapter 18 <b>[APP-053]</b> are proportionate and therefore acceptable.

## 5 Matters Not Agreed

Tables 5-1 below detail by topic the matters not agreed with UK Health Security Agency.

### 5.1 Matters Not Agreed (Air Quality).

Table 5-1

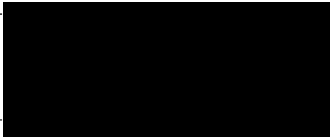
Topic	Sub-topic	Details of Matters Not Agreed
-	-	-

## 6 Signatories

### 6.1 Overview

6.1.1 The above SoCG is agreed between Cottam Solar Project Ltd. (the Applicant) and UK Health Security Agency, as specified below.

Duly authorised for and on behalf of **Cottam Solar Project Ltd.**

Name:	Nigel Mann
Job Title:	Director
Date:	20/06/23
Signature:	

Duly authorised for and on behalf of **UK Health Security Agency.**

Name:	
Job Title:	
Date:	
Signature:	





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Our Ref: CIRIS63514

Dr Zhiyuan Yang  
Principal Environmental Consultant  
Cottam Solar Project Limited

23<sup>rd</sup> August 2023

Dear Dr Yang,

**Nationally Significant Infrastructure Project  
Cottam Solar Project – Statement of Common Ground  
Fire risk assessments**

Thank you for your email dated 8<sup>th</sup> August 2023 relating to the above Nationally Significant Infrastructure Project (NSIP). ***Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided below is sent on behalf of both UKHSA and OHID.***

UKHSA has previously responded to the following consultations:

- Scoping consultation: response dated 24<sup>th</sup> February 2022
- Public consultation - Section 42: response dated 21<sup>st</sup> July 2022
- Registration of Interest: response dated 21<sup>st</sup> March 2023

We include the Statement of Common Ground, shared with UKHSA on 8<sup>th</sup> August 2023, as an appendix to this letter, and confirm there are no outstanding matters on which we are not agreed.

For background information and clarity, Table 4-1 of the Statement of Common Ground highlights matters previously under discussion in relation to fire risk assessments. UKHSA has reviewed the assessments of potential fire scenarios and are satisfied that there would be minimal risk to public health from a fire of either the Battery Energy Storage System, or the solar panels. However, we note as a technical detail, that the assessment has used occupational exposure limits (OELs) for some substances, where Acute Exposure Guideline Levels (AEGLs) could be considered a more appropriate standard. The use of AEGLs would not alter the conclusions of the risk assessments.

Please do not hesitate to contact us if you have any questions or concerns.

Yours sincerely

On behalf of UK Health Security Agency

[nsipconsultations@ukhsa.gov.uk](mailto:nsipconsultations@ukhsa.gov.uk)

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