



UK Health Security Agency

Environmental Hazards and Emergencies Department
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Your Ref: EN010171
Our Ref: 91585CIRIS

The Planning Inspectorate
Environmental Services
Operations Group 3
Temple Quay House
2 The Square
Bristol, BS1 6PN

16 January 2025

Dear Sir/Madam,

Nationally Significant Infrastructure Project

Future Energy Llanwern Solar Project [PINS Ref: EN010171]

Scoping Consultation Stage

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. The response is impartial and independent.

The health of an individual or a population is the result of a complex interaction of a wide range of different determinants of health, from an individual's genetic make-up to lifestyles and behaviours, and the communities, local economy, built and natural environments to global ecosystem trends. All developments will have some effect on the determinants of health, which in turn will influence the health and wellbeing of the general population, vulnerable groups, and individual people. Although assessing impacts on health beyond direct effects from for example emissions to air or road traffic incidents is complex, there is a need to ensure a proportionate assessment focused on an application's significant effects.

Having considered the submitted scoping report we wish to make the following comments:

Environmental Public Health

We understand that the promoter will wish to avoid unnecessary duplication and that many issues including air quality, emissions to water, waste, contaminated land etc. will be covered elsewhere in the Environmental Statement. We believe the summation of relevant issues into a specific section of the report provides a focus which ensures that public health is given adequate consideration. The section should summarise key information, risk

assessments, proposed mitigation measures, conclusions, and residual impacts, relating to human health. Compliance with the requirements of National Policy Statements and relevant guidance and standards should also be highlighted.

In terms of the level of detail to be included in an ES, we recognise that the differing nature of projects is such that their impacts will vary. UKHSA and OHID's predecessor organisation Public Health England produced an advice document *Advice on the content of Environmental Statements accompanying an application under the NSIP Regime*¹, setting out aspects to be addressed within the Environmental Statement¹. This advice document and its recommendations are still valid and should be considered when preparing an ES. Please note that where impacts relating to health and/or further assessments are scoped out, promoters should fully explain and justify this within the submitted documentation.

UKHSA notes that the applicant correctly refers to the EN-5 National Policy Statement for Electricity Networks Infrastructure and the relevant code of practice (Power Lines: Demonstrating compliance with EMF public exposure guidelines'). The applicant also correctly states that cables at voltages up to and including 132 kV do not require further assessment, and in section 17.5.6 they conclude "Therefore, the scope of the assessment of the EMF in relation to the EIA will be limited to cables associated with the Proposed Development that exceed 132kV." This sentence, as well as sections 1.3.1, 2.5.9 – 2.5.12 and 11.4.33, suggest that the proposed development includes cabling that exceed 132kV. However, Table 19-3 mentions that EMFs will be scoped out. It is therefore advised to include a clear statement as to why sources above 132 kV have been scoped out from the assessment.

It should be noted that Public Health Wales (PHW) is the national public health agency in Wales who will take the lead in health and wellbeing considerations.

We hope the information provided is useful and would welcome discussions to clarify any specific concerns or enquiries you may have.

Yours faithfully,

On behalf of UK Health Security Agency

¹
<https://khub.net/documents/135939561/390856715/Advice+on+the+content+of+environmental+statements+accompanying+an+application+under+the+Nationally+Significant+Infrastructure+Planning+Regime.pdf/a86b5521-46cc-98e4-4cad-f81a6c58f2e2?t=1615998516658>

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