

Viking CCS Pipeline

8.27 Draft Statement of Common Ground – UKHSA

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Applicant: Chrysaor Production (U.K.) Limited,
a Harbour Energy Company
PINS Reference: EN070008
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The Infrastructure Planning (Applications: Prescribed Forms
and Procedure) Regulations 2009 - Regulation 5(2)(q)
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Prepared by	Approved by
NC	IM
Onshore Pipeline Construction Lead	Senior DCO Advisor

This Draft Statement of Common Ground has been agreed between Chrysaor Production (UK) Limited and UK Health Security Agency on the day specified below

Signed:

Print Name:

Job Title:

Date:

Duly Authorised for and on behalf of UK Health Security Agency

Signed:

Print Name:

Job Title:

Date:

Duly Authorised for and on behalf of Chrysaor Production (UK) Limited

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1 Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared by Chrysaor Production (UK) Ltd (the 'Applicant') in conjunction with UK Health Security Agency in respect of the Viking CCS Pipeline project (the 'Proposed Development').
- 1.1.2 The SoCG sets out the matters of agreement between the Applicant and UK Health Security Agency and also explains those matters which, at the time of writing, remain unresolved between the parties. The agreements to date have been reached through consultation and continuing discussions between the parties through online meetings.

1.2 The Role of UK Health Security Agency (UKHSA)

- 1.2.1 The UK Health Security Agency (UKHSA) is a government agency in the United Kingdom, responsible for England-wide public health protection and infectious disease capability and replacing Public Health England. It is an executive agency of the Department of Health and Social Care (DHSC).
- 1.2.2 The formation of the UKHSA essentially transferred Public Health England's health improvement functions to DHSC, while its health protection elements formed part of the new government agency.

1.3 Purpose of this Statement of Common Ground

- 1.3.1 The purpose of this document is to summarise the agreements reached between the parties on matters relevant to the examination of the application and to assist the Examining Authority ('ExA'). It also sets out the matters that remain unresolved at the time of writing, but which both parties are working positively toward resolving. As such, it is expected that further iterations of the SoCG will be submitted to the ExA throughout the Examination and prior to the making of any Development Consent Order ('DCO') for the Proposed Development.
- 1.3.2 The SoCG has been prepared with regard to the guidance in 'Planning Act 2008: examination of applications for development consent' (Department for Communities and Local Government, March 2015).
- 1.3.3 The remainder of this SoCG is structured as follows:
- Section 2 – Summary of consultation and discussions; and
 - Section 3 - Position of the parties

1.4 Status of this Statement of Common Ground

- 1.4.1 This SoCG is currently in draft form.

2 Summary of Consultation and Discussions

Introduction

- 2.1.1 In addition to the consultation undertaken as part of statutory consultation, there have been a number of meetings and correspondence relating to the Proposed Development. Details of various meetings and key correspondence are set out in Table 2-1 Record of meetings and correspondence with UKHSA. Table 2-1 below.

Table 2-1 Record of meetings and correspondence with UKHSA.

Date of meeting/ correspondence	Description of meeting/correspondence
N/A	The Examining Authority requested that a Statement of Common Ground be prepared in the Rule 6 letter (issued on 27th February 2024).
22 nd March 2024	Email correspondence regarding DCO Application acceptance and issue of SoCG
4 th April 2024	Request for telecom meeting to discuss SoCG
12 th April 2024	Email correspondence on arrangement of telecom meeting and invites
17 th April 2024	Telecom meeting, awaiting return of draft SoCG with UKHSA input

3 Position of the Parties

3.1.1 Table 3-1 sets out the position of the parties relating to the following topics:

- Assessment of effects on public health; and
- Mitigation of effects on public health

3.1.2 To provide clarity, each of the matters for which a position has been attributed have been colour coded as follows:

Agreed	The matter is agreed between the parties, or there are no significant disagreement such that the matter is considered closed.
Not agreed - no material impact	The matter is not agreed between the parties; however the outcome of the approach taken by the Applicant or UKHSA is not considered to result in a material impact to the assessment conclusions. Discussions on this matter have concluded.
In discussion	This matter is neither 'agreed' or 'not agreed'. Technical work is being undertaken with the aim of achieving agreement, though the risk of disagreement remains.
Not agreed	The matter is not agreed between the parties and the outcome of the approach taken by the Applicant or UKHSA is considered to result in a materially different impact to the assessment conclusions.

Table 3-1 Position of the Parties

ID	Matter	Detail	Related documents and their references	Comments from the Parties	Agreed / Not Agreed
Environmental Assessment					
UKHSA1	Major Accidents and Disasters	Chapter 19 of the Environmental Statement (Major Accidents and Disasters) [APP-061] adequately assesses the reasonably foreseeable worst-case environmental consequences of any major accidents or disasters from the Proposed Development.	APP-061	UKHSA: [UKHSA to provide comments] Applicant:	In Discussion
UKHSA2	Major Accidents and Disasters	The mitigation measures set out in Chapter 19 of the Environmental Statement (Major Accidents and Disasters) [APP-061] and secured within the draft CEMP [APP-068] are appropriate to manage the risk of major accidents from the Proposed Development to an acceptable level.	APP-061; APP-068	UKHSA: [UKHSA to provide comments] Applicant:	In Discussion
UKHSA3	Public Health	Chapters 12 (Traffic and Transport) [APP-054], 13 (Noise and Vibration) [APP-055], 14(Air quality) [APP-056] and 17 (Health and Wellbeing) [APP-059] of the Environmental Statement adequately assesses the potential impacts of the Proposed Development on public health	APP-054; APP-055; APP-056; APP-059	UKHSA: Air Quality - The Promoter provides an assessment of construction phase traffic data that predicts exceedances of IAQM and DMRB screening criteria in the construction phase. They conclude that due to the temporary nature of the works, the good baseline air quality, and the fact that the data represents a worst-case increase in traffic, no significant effects (with respect to air quality) are anticipated. UKHSA are of the opinion that it is unclear what the ramifications of these exceedances are as no detailed assessments have been provided. Applicant: Air Quality - According to the IAQM planning guidance referred to in the Relevant Representation, the screening criteria set out in that guidance are <i>“precautionary and should be treated as indicative”</i> . The guidance states that they <i>“function as a sensitive ‘trigger’ for initiating an assessment in cases where there is a possibility of significant effects arising on local air quality”</i> . It is the Applicant’s opinion that where traffic impacts exceed the IAQM screening criteria, as listed in the ES Chapter 14: Air Quality [APP-056] , there is no possibility of a significant effect arising. For an impact to have a potential significant effect, the IAQM suggest the following for describing the impact at individual receptors.	In Discussion

ID	Matter	Detail	Related documents and their references	Comments from the Parties	Agreed / Not Agreed																																		
				<p>Table 6.3: Impact descriptors for individual receptors.</p> <table border="1" data-bbox="1576 317 2466 569"> <thead> <tr> <th rowspan="2">Long term average Concentration at receptor in assessment year</th> <th colspan="4">% Change in concentration relative to Air Quality Assessment Level (AQAL)</th> </tr> <tr> <th>1</th> <th>2-5</th> <th>6-10</th> <th>>10</th> </tr> </thead> <tbody> <tr> <td>75% or less of AQAL</td> <td>Negligible</td> <td>Negligible</td> <td>Slight</td> <td>Moderate</td> </tr> <tr> <td>76-94% of AQAL</td> <td>Negligible</td> <td>Slight</td> <td>Moderate</td> <td>Moderate</td> </tr> <tr> <td>95-102% of AQAL</td> <td>Slight</td> <td>Moderate</td> <td>Moderate</td> <td>Substantial</td> </tr> <tr> <td>103-109% of AQAL</td> <td>Moderate</td> <td>Moderate</td> <td>Substantial</td> <td>Substantial</td> </tr> <tr> <td>110% or more of AQAL</td> <td>Moderate</td> <td>Substantial</td> <td>Substantial</td> <td>Substantial</td> </tr> </tbody> </table> <p>The effect and its significance are then determined by professional judgement, taking account of how many receptors are affected by each impact descriptor, the current risk and future risk of an air quality standard being exceeded, and other factors, such as the duration of increased exposure.</p> <p>Table 14-11 of ES Chapter 14 demonstrates the baseline air quality in the vicinity of the Proposed Development. The monitoring has been undertaken by the Local Authorities and represent background and roadside locations. Except for monitoring undertaken within the Cleethorpes Air Quality Management Area, annual mean nitrogen dioxide (NO₂) concentrations are 75% or less of the air quality objective.</p> <p>This suggests that even a change in annual mean concentration of NO₂ of up to 25% of the air quality objective (10 µg/m³) would not cause an exceedance of that objective.</p> <p>It is the Applicant’s opinion that the traffic impacts reported in Table 14-17 of ES Chapter 14 are not capable of increasing annual mean NO₂ concentrations by anything like that required to cause ‘moderate’ or ‘substantial’ impacts, as described by the IAQM. The temporary nature of the traffic impacts only goes to strengthen this opinion.</p> <p>It should be noted that traffic impacts on the A180 Cleethorpe Road (through the AQMA) do not exceed the air quality screening criteria set out in the IAQM guidance. It should also be noted that whilst the air quality chapter of the ES does refer to the DMRB air quality screening criteria, it does so only for the purpose of informing the ecology assessment</p>	Long term average Concentration at receptor in assessment year	% Change in concentration relative to Air Quality Assessment Level (AQAL)				1	2-5	6-10	>10	75% or less of AQAL	Negligible	Negligible	Slight	Moderate	76-94% of AQAL	Negligible	Slight	Moderate	Moderate	95-102% of AQAL	Slight	Moderate	Moderate	Substantial	103-109% of AQAL	Moderate	Moderate	Substantial	Substantial	110% or more of AQAL	Moderate	Substantial	Substantial	Substantial	
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UKHSA4	Public Health	Chapter 17 (Health and Wellbeing) [APP-059] of the Environmental Statement adequately assesses the potential impacts of the Proposed Development on public health	APP-059	<p><u>UKHSA:</u></p> <p>EMF - The Promoter should assess the potential public health impact of EMFs arising from the electrical equipment associated with the</p>	Agreed																																		

ID	Matter	Detail	Related documents and their references	Comments from the Parties	Agreed / Not Agreed
				<p>development. Alternatively, a statement should be provided to explain why EMFs can be scoped out.</p> <p><u>Applicant:</u></p> <p>EMF - The former Department for Energy and Climate Change (DECC, now Department for Energy Security and Net Zero) Voluntary Code of Practice on compliance with EMF guidelines, states the following:</p> <p><i>“The Energy Networks Association will maintain a publicly-available list on its website of types of equipment where the design is such that it is not capable of exceeding the ICNIRP exposure guidelines, with evidence as to why this is the case. Such types of equipment are likely to include:</i></p> <ul style="list-style-type: none"> • <i>overhead power lines at voltages up to and including 132 kV</i> • <i>underground cables at voltages up to and including 132 kV</i> • <i>substations at and beyond the publicly accessible perimeter</i> <p><i>Compliance with exposure guidelines for such equipment will be assumed unless evidence is brought to the contrary in specific cases“</i></p> <p>Paragraphs 17.7.66 to 17.7.70 in ES Chapter 17 Health and Wellbeing [APP-059] cover the issue of EMF and cite the DECC guidance.</p> <p>With reference to this guidance, paragraph 17.7.70 of ES Chapter 17 Health and Wellbeing [APP-059] confirms that:</p> <p><i>“The design of the Proposed Development does not include either high-voltage underground cables or overhead line cables within its design. As a result, there will be no effect during all stages of the Proposed Development arising in respect of human health and wellbeing in relation to EMF.”</i></p>	

4 References

There are no documents referenced at present.