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Your Ref: EN0110016  
Our Ref: CIRIS 91880

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EIA and Land Rights Advisor,  
The Planning Inspectorate  
Environmental Services  
Operations Group 3  
Temple Quay House  
2 The Square  
Bristol, BS1 6PN

4 March 2025

Dear ██████████

**Nationally Significant Infrastructure Project**  
**Leoda Solar Farm**  
**Scoping Consultation Stage**

Thank you for including the UK Health Security Agency (UKHSA) in the scoping consultation phase of the above application. ***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.*** 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 specific comments and recommendations:

## **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 (ES). 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*<sup>1</sup>, setting out aspects to be addressed within the Environmental Statement<sup>1</sup>. 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.

## **Major Accidents & Disasters**

We understand that the applicant proposes not to include a dedicated chapter for accidents and disasters. The proposed development will include a Battery Energy Storage System (BESS) and various electrical infrastructure. While the likelihood of an incident involving the BESS can be greatly reduced in the design stage of the project, the impact of such incidents should be evaluated. The location of the BESS is not currently given in the documentation and consequently the applicant should assess, within the ES, the risk to nearby public health and environmental receptors from:

- Failure of the BESS causing fire and release of smoke and associated toxic gases.
- Release to the environment of potentially contaminated water used by the fire service in response to a BESS fire.

## **Recommendation**

Further detail should include the likely emissions from fire incidents and proximity of the BESS to sensitive human health receptors.

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<sup>1</sup>  
<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>

## **EMF**

Please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines:

<https://assets.publishing.service.gov.uk/media/5a796799ed915d07d35b5397/1256-code-practice-emf-public-exp-guidelines.pdf>.

Pertinent to item 16.8.11, which suggests that areas above 400 kV underground cables are accessible to the public:

“For all other equipment (e.g. overhead power lines and underground cables at voltages of 275 kV and 400 kV), when evidence of compliance with exposure guidelines is needed, the following will be provided:

- A calculation or measurement of the maximum fields (ie directly under the line, or directly above the cable)”

## **Recommendation**

We request that the ES clarifies this and if necessary, the proposer should confirm either that the proposed development does not impact any receptors from potential sources of EMF; or ensure that an adequate assessment of the possible impacts is undertaken and included in the ES.

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.*