



UK Health
Security
Agency

Environmental Hazards and Emergencies Department
Seaton House, City Link
London Road
Nottingham, NG2 4LA

nsipconsultations@ukhsa.gov.uk
www.gov.uk/ukhsa

Your Ref: EN0210005
Our Ref: CIRIS91976

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

17th March 2025

Dear ██████████,

**Nationally Significant Infrastructure Project
Morven Hawthorn Pit Grid Connection Project - EN0210005
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 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 recognise the promoter proposal to also include a health chapter. 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.

Recommendations

One of the applicant's screening decisions is to scope out emissions to air of pollutants and dust that arise from the decommissioning phase as these are estimated to be half or less than half of the impact from commissioning given that the cables will be left in situ. We note from the information on the health chapter (see Section 9.2 *Human Health* of the *Morven Hawthorn Pit Grid Connection Project Environmental Impact Assessment Scoping Report*) that air quality modelling will be carried out. If this is undertaken, we recommend that the assessment of emissions to air from decommissioning works during the decommissioning phase is informed by the results of this air quality modelling.

The applicant scopes out the impact of EMF on human health based on the considerations that commissioning & decommissioning work would not interfere with major electrical infrastructure producing EMF, and that during O&M the project would adopt suitable guidelines on EMF public exposure. We recommend that once the onshore project locations are finalised, that the applicant reassess the scoping analysis for impact of EMF on human

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>

health during commissioning, decommissioning and the O&M phases to ensure that the assumptions central to the scoping decision remain valid.

For potential EMF health impacts, UKHSA requests more information about the electrical infrastructure associated with the project. Please refer to the following code of practice, which defines the criteria for demonstrating compliance with the public exposure guidelines, including the operational conditions for scoping out electrical infrastructure:

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

More information is available in the following advice document produced by Public Health England, a UKHSA predecessor body¹.

Yours sincerely

On behalf of UK Health Security Agency

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