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Your Ref: EN010103  
Our Ref: 60073

Ms Sian Evans  
Case Manager  
The Planning Inspectorate  
3/20 Eagle Wing  
Temple Quay House  
2 The Square  
Bristol BS1 6PN

23<sup>rd</sup> August 2022

Dear Ms Evans

**Nationally Significant Infrastructure Project**  
**The Net Zero Project – Land at and in the Vicinity of the Former SSI Steel Works Site,**  
**Redcar and in Stockton-on-Tees, Teesside (Ref: EN10103)**  
**Second Written Questions**

Thank you for the written questions directed to the UK Health Security Agency (UKHSA) on 9<sup>th</sup> August 2022. The response is impartial and independent.

Having considered the submitted materials throughout this process, we wish to make the following specific comments and recommendations in response to your questions.

***Question MA.2.4: Can the UK Health Security Agency comment on the Applicants' approach to assessment of major accidents as set out in ES Chapter 2 Major Accidents and Natural Disasters 2 [APP-104] in the context of the Proposed Development comprising elements of novel technology?***

The applicant has included and considered appropriate accident and hazard scenarios and demonstrated mitigation measures to ensure risk is 'as low as reasonably practicable' (ALARP). The applicant states that there is no specific approach for undertaking major accident and natural disaster within EIA, however, the applicant signposts appropriate alternatives in paragraph 22.3.4

*“There is no specific guidance available which sets out the approach for undertaking a MA&NDs assessment within an EIA. However, there is a considerable amount of information and guidance available to developers on the identification and control of major hazards associated with the design and operation of gas fired power stations, the storage and use of chemicals, and major accident hazard pipelines conveying hazardous fluids.”*

It appears that the applicant has considered appropriate guidance and best practice information to determine the assessment methodology, such as Emergency Planning for Major Accidents: Control of Major Accident Hazards Regulations 2015 (COMAH) (HSE, 2015); Further Guidance on Emergency Plans for Major Accident Hazard Pipelines (HSE, 1996); Chemicals and Downstream Oil Industries Forum Guidelines, Environmental Risk Tolerability for COMAH Establishments (CDOIF, 2017); Chapter 4 of the Cabinet Office’s Emergency Preparedness guidance on part 1 of the Civil Contingencies Act 2004 (HM Government, 2012); and Reducing Risks, Protecting People: HSE’s Decision Making Process, (HSE, 1999).

Furthermore, in paragraph 22.9.4 of the Environmental Statement: Volume I Chapter 22 – Major Accidents and Natural Hazards (Document Ref. 6.2), the applicant states that *“The Proposed Development will require appropriate permissions to be in place for its operation including COMAH Licence and Environmental Permit, and these regulatory controls will stipulate a number of requirements that must be demonstrated to prevent or minimise the effects of major accidents.”* HSE have dedicated guidance on carbon, capture and storage (HSE, 2021), and as the regulatory body for COMAH sites may be able to further advise on the appropriateness of the applicants’ assessment of major accidents in the context of the Proposed Development comprising elements of novel technology.

***Question MA.2.5: Does the UK Health Security Agency consider that the Applicants have identified and assessed the potential risks associated with the carbon capture, transport and storage component?***

In Tables 22-2 and 22-3 of the Environmental Statement: Volume I Chapter 22 – Major Accidents and Natural Hazards (Document Ref. 6.2) the applicant assesses the potential Major Accident and/ or Disaster Events during construction and operational phases of the project. Common scenarios have been considered by the applicant, such as fire/explosions, leaks and spillages of chemicals/fuels, and extreme weather, with all scenarios determined by the applicant to be mitigated to ALARP.

In paragraph 22.9.4 of the Environmental Statement: Volume I Chapter 22 – Major Accidents and Natural Hazards (Document Ref. 6.2), the applicant states that *“The Proposed Development will require appropriate permissions to be in place for its operation including COMAH Licence and Environmental Permit, and these regulatory controls will stipulate a number of requirements that must be demonstrated to prevent or minimise the effects of major accidents.”* Therefore, the applicants’ identification, assessment and proposed management of risks will also be assessed during the application for both the COMAH

Licence and Environmental Permit and demonstrate adherence to the Regulations (authorised by the HSE and Environment Agency respectively). In addition, as part of COMAH site regulation, UKHSA will be consulted on the applicants' proposed off-site emergency plan to assess public health risks and that appropriate mitigation and contingency measures are in place. Furthermore, UKHSA is consulted by the Environment Agency on potential public health risks of activities regulated under the Environmental Permitting Regulations, with accident mitigation and management forming part of this assessment.

Yours sincerely

On behalf of UK Health Security Agency  
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*Please mark any correspondence for the attention of National Infrastructure Planning Administration*