

SPR EA 1N AND EA 2 PROJECTS DEADLINE 8 – ISH 10 REPRESENTATIONS

HEALTH AND SOCIAL WELLBEING

Interested Party: PINS Refs: 20024475 & 20024476

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According to the **World Health Organization (WHO)**: “Health is a state of complete physical, mental and social well-being and not merely an absence of disease or infirmity”.

The **Oxford English Dictionary** defines Wellbeing as: “the state of being comfortable, healthy or happy.” Recognising that wellbeing is a much broader concept than moment-to-moment happiness.

The **NHS** identifies stress as being “a reaction to mental or emotional pressure..., often related to a feeling like you are losing control over something”. Stress can have physical symptoms eg high blood pressure, muscle tension, trouble sleeping; emotional symptoms eg anxiety or depression, irritability; and behavioural symptoms eg increased use of alcohol or cigarettes and avoiding responsibilities

I liken the causes of stress and anxiety, as experienced by those affected by the onshore aspects of the Applicant’s proposed development, like ‘layers of an onion’ – layer upon layer getting stronger as we get closer to the ending of this examination process.

It is difficult to know where to start as the Department for Health and Social Care suggests that there is no formula or standard set of indicators used to measure localised effects on mental health by major schemes, and as schemes differ, this would be difficult to standardise, but it does expect mental health considerations to form part of the planning process – hence we are discussing this today.

When faced with the conclusions reached by the Applicant in its Environmental Statement that: the impact of the proposed EA1N and EA2 projects on Human Health and Wellbeing are ‘insignificant’ and ‘negligible’ this comes over to those affected as being hugely insensitive to the very real uncertainties the local communities face. The impacts on Human Health and Wellbeing, as SASES outlined in its Deadline 1 Written Representations undermine the social and economic fabric of the community which is contrary to S8 National Planning Policy Framework Government Planning Policy, February 2019 in promoting healthy and safe communities. Quoting from the Chair’s Forward to the report: ‘The State of the Environment: Health, People and the Environment’ published by the UK Environment Agency, September 2020, she states: “The physical and mental health of everyone depends on quality green and blue space, and it reduces the burden on the NHS. At a time when there is such widespread recognition of these essential facts, we should value work to protect and enhance the natural world highly”. Some of its main findings are that:

- Air pollution is the single biggest environmental threat to health in the UK, shortening tens of thousands of lives each year.

- After air pollution, noise causes the second highest pollution-related burden of disease in Europe, and is responsible for more life years lost than lead, ozone or dioxins.
- Mental health conditions are increasing - they are the largest single cause of disability in the UK, and can be caused or affected by pollution, flooding and climate change.
- There is substantial and growing evidence for the physical and mental health benefits of spending time in the natural environment.
- There are opportunities to improve health through the choices government, regulators, businesses and individuals make in creating and contributing to healthier, greener and more accessible environments.

Not easy reading when those affected by Applicant's proposals believe there will be reduced air quality, through dust at construction sites, they fear water contamination as drilling takes place at landfall, they believe there will be an increased flood risk at Friston, there will be a large influx of vehicles on country lanes leading to fears of safety on the lanes for pedestrians and cyclists and HGVs spewing out exhaust fumes, that there will be a loss of arable farm land, heritage assets and public rights of ways, fears over the economic future when tourism is impacted – as people no longer find the peace and tranquility they used to find in the area. Is it any wonder people are anxious?

To assist in explaining the stress and anxiety felt by those affected by the Applicant's proposed projects I would like make reference to the "Mental Health and Wellbeing Assessment for Major Infrastructure Schemes Scoping Report ". The Phase 2a Hybrid Bill Select Committee on 13 June 2018 requested that the Government produce a scoping report within a four week period to consider what types of things could be done to better understand the relationship between mental health and wellbeing and major infrastructure projects. This particular report was in connection with construction of the HS2 rail project – another major infrastructure scheme. The report noted that major infrastructure schemes can introduce significant impacts and effects on communities and individuals during **construction** and **operation** but can also have an impact during their **development**. I would like to briefly outline how the last two years have caused very real stress and anxiety for those impacted by the onshore locations of the proposed projects EA1N and EA2.

To summarise some of the possible causes or triggers for stress and anxiety or impacts to wellbeing resulting from the process of developing major infrastructure schemes were considered to be:

1. **The amount of time required to develop the scheme** –In its Consultation Report paragraph 91 (pg 24) the Applicant says: "In accordance with Section 47 of the Planning Act, the Applicant is required to consult with people living in the vicinity of the proposed development". Ironically the people most affected by the Applicant's proposed development in the early days of planning had no idea of what was to befall them! The villagers of Friston have known about the onshore developments associated with the project only since March/April 2018. In the past two years fear,

anxiety and stress has already taken its toll on the residents of this area – this will only continue should the Examining Authority grant consent to the Applicant.

2. **The process of developing the scheme** - As with the majority of major infrastructure schemes, the EA1N and EA2 projects have had many stages in their development. Having to keep track and respond to the various stages of development has been stressful. The Applicant's Consultation Report details its Consultation events, please allow me just to outline them here. They include:

- **The Pre-Phase 1 and Phase 1 Consultation** the advert for which, (5.2), made no mention of on-shore development, referred only to SPRs off-shore windfarms. The residents of Friston discovered however that no invitation was sent to, or received by, Friston Parish Council nor the residents! Leading them to feeling that they had been omitted from this stage of the Consultation deliberately.
- In **March/April 2018 Phase 2 Consultation** took place – the Applicant's Consultation Report notes that there were two meetings with Friston Parish Council: on 5th March and 16th April, however Para. 168 of the Consultation report notes: "Although there was no Public Information Day at Friston, other locations which could have been attended were advertised through posters, newspaper articles and online". Para 172 states "The Applicant sought to engage with the 'hard to reach' audience including tourists, second home-owners, parts of the working population, those with disabilities and those with limited internet access by deploying a mail drop during the week commencing 12th March 2018 to over 5,000 residents and businesses in the following areas: Orford, Aldeburgh, Thorpeness, Sizewell, Southwold, Reydon and Walberswick". But not for Friston second home-owners!

Para 173 of the Consultation Report does outline details of the Public Information Day events that were shared on social media including local Facebook community pages and on the SPR Twitter page – I must say these are hardly locations familiar or used by the majority of Friston residents! The question locals ask is 'why were SPR being so secretive'? The perception by villagers is that 'Friston was being excluded' - a source of anxiety, anger and frustration to villagers.

- In **May to August 2018 was the Phase 3 Consultation** – 24th May saw the first Friston Parish Briefing meeting, followed by a Public Information Day on 29th June, this was followed on 18th July by a newly formed SASES Friston Working Group/ Action Group Meeting and another Public Information Day on 28th July 2018. The Public Information Days, conducted as part of the Applicant's Consultation were unfortunately felt by villagers to be a tick-box exercise. They were at best a PR exercise, the experience of villagers was that there were too few 'experts' to give real information, SPR representatives didn't have answers to questions, there was a lack of knowledge of the local area by the representatives and the photo montages that were produced of the proposed development didn't even show where the village was in relation to the proposed site.

- **September to November 2018 saw Phase 3.5 Consultation** – there were public meetings held in Friston, Knodishall, Leiston and Thorpeness, followed by meetings on 10th and 13th December to Leiston Town Council, Sizewell Residents Association and Save our Sandling and then Friston Parish Council and SASES where the Applicant confirmed their choice as Friston for the proposed substations. This was ultimately based on their RAG assessment, which as you know is a document deemed by SASES and many others as somewhat flawed
- **Feb/March 2019 Phase 4 Consultation** was conducted with detailed copies of Volume 1 (chapters) and Volume 2 (figures) of the PEIR, together with the Non-Technical Summary and the Habitat Regulations Assessment: Draft Report to Inform the Appropriate Assessment which were made available to be inspected kindly free of charge from 11th February 2019 until 26th March 2019 at a variety of locations in addition to being available on the SPRs website. USB flash drives containing the entire PEIR content were made available at all locations. There were also Public Information Days in a variety of locations followed in February and March 2019 with community groups. It is only at these Public Information Days that people were starting to become aware of the extent of the devastation that was likely to follow should consent be granted. SPR presented details of the proposed development, potential impacts on, as they describe “human and environmental receptors” – or to us people, their homes, the roads and the villages; they went on to include details of mitigation measures and cumulative impacts.

The documents were a further cause of stress. Initially the volume of material alone that people were confronted with, was a cause of anxiety. With limited access and availability and such a short amount of time in which to absorb the material, let alone respond to, it was simply asking too much of people. Remember we are talking about residents, some of whom are retired, some in their 70's, 80s and even 90s, others in part-time or full-time work – how could they ever read, let alone comprehend the reams of paper?

Having tried to grapple with the inordinate number of documents produced by the Applicant to date and the contents therein, it feels to the ordinary person, that either the Applicant, or those responsible for the framework of Planning documents, do not wish those who are directly affected to easily read and understand them, as a consequence the real impact of proposed works are difficult to decipher and come to terms with. Clearly the documents were written by consultants/authors at a distance with no knowledge of the area and with little or no comprehension of or care for the local people, environment, its characteristics and its fragility. Just a simple reading of one extract on tourism which states “...people are drawn to the area for its sandy beaches” – baffles the residents of Aldeburgh, Thorpeness and Sizewell with their beaches of shingle and pebbles!

Focusing attention on the contents of Chapter 27 of the Applicant’s Environmental Statement Human Health. The problems:

- There are far too many pages -124 in total
- The document begins with one and a half pages: “A Glossary of Acronyms”, which are then followed by a further two pages: “A Glossary of Terminology”.
- The document concludes with eight and a half pages of References
- The contents of pages in between contain links to at least eight other Chapters, hundreds of pages in length, which and I quote, “..inform and have been informed by..” So, in order to gain a thorough understanding of the issues, it is necessary to also read the following eight documents:
 - Chapter 18: Ground Conditions and Contamination
 - Chapter 19: Air Quality
 - Chapter 20: Water Resources and Flood Risk
 - Chapter 21: Land Use and Agriculture
 - Chapter 25: Noise and Vibration
 - Chapter 26: Traffic and Transport
 - Chapter 29: Landscape and Visual Impact Assessment
 - Chapter 30: Tourism, Recreation and Socio-Economics

And where could one find these documents: in a limited number of locations with restricted availability. Thanks to a request, a set of documents (doubled in number because they were for both EA1N and EA2) was delivered to Friston Village Hall, where again access was restricted by Village Hall events and the willingness of somebody to open up the Hall and be present whilst anyone wished to look at the documents! With the best will in the world trying to get to see the documents was not easy but then to plough through the sheer amount of information was frustrating, and when there, when reading the said documents one discovered much repetition, irrelevant information and the use of old data.

On close inspection there were some seemingly helpful Tables eg 27.2 “Potential Sources of Impact Leading to Potential Health Effects”. This listed the ‘Potential Sources’ (eg dust generated during construction), the ‘Potential Pathway’ (temporary inconvenience or inhalation of particles) and the ‘Potential Receptor’ (eg site specific population), but in order to get further information it was then necessary to go to pick up and plough through the Chapter, 19: Air Quality.

To give another example:

Table 27.2 Realistic Worse Case Scenarios: the ‘Impact’ was the “Construction Date”, the ‘Parameter’ was “Earliest start of the construction is mid 2023”, ‘Notes’ were “Vehicle movements have been calculated using this parameter and are detailed further in Chapter 26: Traffic and Transport” – another volume to gather and plough through!

Just one more:

Table 27.4 ‘Embedded Mitigation Measures and Best Practice for Human Health’. Here, the ‘Parameter’ is “Construction”, ‘Mitigation Measures Embedded into Project Design’ is “Use of relevant best practice and techniques ...to avoid or reduce impact which will affect the onshore development area”, but then the reader is

referred to nine other Chapters (eg Chapter 19: Air Quality) – more volumes to plough through.

Ironically, that **very** Table: the ‘Parameter’: “Perception of Risk” was followed by ‘Mitigation Measures Embedded into Project Design’ which states: “Perceptions are influenced by availability of information and engagement in decision making process. The Applicant has implemented a thorough process of community engagement, including Public Information Days and stakeholder engagement. Information from these has informed the design development and updates have been provided to local communities throughout the planning process”. Many, if not all, residents of Friston would say when was the “thorough process of community engagement?

3. **Ongoing development of proposed onshore** works even ongoing throughout the DCO Application have led to the identification of new or different impacts. Changes made to roads likely to be used, changes to decisions on the cutting back of hedgerows, works have been shifted further to the East from the West. There are still uncertainties about where drains will be placed etc. the sort of drilling that is to take place etc. Some changes have led to peoples’ surprise at now being affected by the proposals. A cause of stress for them, but maybe relief to those maybe now no longer affected
4. **Cumulative impacts of other energy projects** this is two-fold: firstly as both individuals and local communities along with Stakeholders eg SCC and Natural England are having to respond to the development of other energy projects, some already at the Examination stage eg Sizewell C - the length of time in which responses need to be made are short this can lead to difficult choices as to which project to prioritise; secondly as people learn about plans already in the public domain likely to bring further construction with its devastation and impact on the same geographic area.
5. **Fear of the unknown** - There are still individuals who know that they will be affected by the Applicant’s propose projects but do not have the full information on exactly how and when they will be affected; what will be the exact impact on their property from being next to the haul road? Will the noise from the substations result in the loss of pleasure in gardens? How will property be affected by its proximity to the site boundary? What will happen when the village floods? How will journeys be affected by works traffic? What will happen to the birds and wildlife? What exactly do the ceiling ends look like? This uncertainty is causing stress and anxiety especially when exacerbated experts giving evidence in the Hearings disagree with each other – who is to be believed?
6. **Conflicting information from third parties** whether they be groups or organisations affected by proposed infrastructure schemes may produce conflicting information which can cause anxiety both in communities and for individuals. Avoiding and mitigating environmental impacts can sometimes require trade-offs (which we have seen with East Suffolk Council) and balancing priorities which, taken in isolation, can cause stress or anxiety. Other organisations may use incorrect data (e.g. exaggerate noise impacts, number of demolitions etc) which can cause stress.
7. **Mistrust** - there is the possibility that individuals or communities feel that they cannot trust officials or the information provided at consultation events and in the

Applicant's documentation. They feel that the impacts of the proposed projects are underestimated or benefits overestimated. Some people affected by the projects may also feel they are going to happen no matter what they do and therefore not want to involve themselves in the process. This causes frustration in communities.

8. **Individuals' concerns that they may lose money as a result of the project.**
Homeowners have concerns over the value of their house or, even worse fear that it will become unsellable. This has been the case already in Friston. People may have concerns over needing to relocate or not being able to pass their property or business on to their children. We know too, from the Hearings that have taken place, that many businesses fear the loss of their customer base, as tourism will be affected by the many years of construction, traffic, noise and disruption.
9. **Understanding of compensation that may be available** – Compensation, no doubt, will be available to some individuals affected by the project this will evolve over time and there will probably be different compensations available to people depending on how they are affected by the projects. These different options and their applicability are hard to understand and confusing and this could contribute to any stress experienced. It too can cause problems amongst neighbours. But for many the reality is that there is no adequate compensation for what will be lost – history, peace and tranquility, wildlife, trees and hedgerows, dark skies etc
10. **Individuals or organisations not understanding the requirements of developing a major infrastructure scheme** - it goes without saying that there are people who do not understand or fully appreciate all the factors that need to be taken into account when developing a major infrastructure scheme. For example, the need to avoid protected areas such as the Area of Outstanding Natural Beauty (AONB) and Sites of Special Scientific Interest (SSSI), especially when the proposed works may affect communities instead. This causes frustration and stress trying to work out why someone thinks that one space is more valuable than another.

Ironically the Applicant states: "The only way to mitigate against uncertainty is through strong communication and provision of information by the Applicant". (EA1North Environmental Statement 27.6.2.2.3 – 251). I would conclude that the Applicant has **NOT** embarked on a process of 'strong communication and provision of information' with those who are affected by its plans, rather the reverse is true. The Applicant has continually failed to answer questions, has not produced any evidence to show how the village and indeed any residents of this part of East Suffolk will benefit and continues to be guarded about the extent to which the village of Friston is **really** going to be affected by its proposed projects.

There are other external factors which further add to the existing stress and anxiety:

- We cannot take out of the equation the current Covid pandemic. In this time of national crisis, peoples' energies and resources are being drained. Emotional Health is at a low ebb, with individuals not being able to see family and friends, stresses brought on by being furloughed from work, or worse still, unemployment, real concerns over the ability to protect oneself from the virus and the restrictions of staying in the local area. The Application facing this Examining Authority threatens people with the loss of key green spaces and Public Rights of Way which have

become so important. Individuals do not want to lose the ability to exercise and walk their dogs without the need for getting in the car.

- Having to conduct the proceedings for this DCO Examination on-line has been a source of stress and anxiety to many. Using technology one is unfamiliar with, having to deal with unreliable broadband etc. has been stressful – even just compiling, condensing and then presenting material into five minutes for many people has been daunting. However, I must say that the team behind the scenes has supported people magnificently.

I respectfully ask the Examining Authority that if they are mindful to give consent to the Applicant, that they reject the **onshore works** associated with the EA1N and EA2 project.