



East Anglia TWO Offshore Windfarm

Appendix 27.1 Human Health Consultation Responses

Environmental Statement Volume 3

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Glossary of Acronyms

AC	Alternating Current
AHAH	Access to Health Assets and Hazards
ALARP	As Low As Reasonably Practicable
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Areas
AQO	Air Quality Objective
CCS	Construction Consolidation Site
CIA	Cumulative Impact Assessment
CMS	Construction Method Statement
COMAH	Control of Major Accident Hazards
dB(A)	A-weighted Decibels
DC	Direct Current
DCO	Development Consent Order
DECC	Department of Energy and Climate Change
DTI	Department of Trade and Industry
EEA	European Economic Area
EIA	Environmental Impact Assessment
ELF	Extremely Low Frequency
EMF	Electromagnetic field
ES	Environmental Statement
ETG	Expert Topic Group
EU	European Union
GHz	Gigahertz
ha	Hectares
HDD	Horizontal Directional Drilling
HGV	Heavy Goods Vehicle
HIA	Health Impact Assessment
HPA	Health Protection Agency
HVAC	High Voltage Alternating Current
Hz	Hertz
ICNIRP	International Commission on Non-Ionizing Radiation Protection
IEMA	Institute of Environmental Management and Assessment
IMD	Index of Multiple Deprivation
IPC	Infrastructure Planning Commission
JSNA	Joint Strategic Needs Assessment
km	Kilometres
LEP	Local Enterprise Partnership
LSOA	Lower Super Output Area
NEET	Not in Education or Employment
NPS	National Policy Statement
NRPB	National Radiological Protection Board
ONS	Office of National Statistics
PEIR	Preliminary Environmental Information Report
PHE	Public Health England

PID	Public Information Day
PM	Particulate Matter
PPG	Pollution Prevention Guidance
PRoW	Public Rights of Way
SAGE	Stakeholder Advisory Group on Extremely Low Frequency Electric and Magnetic Fields
SoS	Secretary of State
SSSI	Site of Special Scientific Interest
μ T	Microteslas
V	Volts
V/m	Volts per metre
WHO	World Health Organisation

Glossary of Terminology

Applicant	East Anglia TWO Limited.
Cable sealing end compound	A compound which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Cable sealing end (with circuit breaker) compound	A compound (which includes a circuit breaker) which allows the safe transition of cables between the overhead lines and underground cables which connect to the National Grid substation.
Construction consolidation sites	Compounds associated with the onshore works which may include elements such as hard standings, lay down and storage areas for construction materials and equipment, areas for vehicular parking, welfare facilities, wheel washing facilities, workshop facilities and temporary fencing or other means of enclosure.
Development area	The area comprising the onshore development area and the offshore development area (described as the 'order limits' within the Development Consent Order).
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO windfarm site	The offshore area within which wind turbines and offshore platforms will be located.
European site	Sites designated for nature conservation under the Habitats Directive and Birds Directive, as defined in regulation 8 of the Conservation of Habitats and Species Regulations 2017 and regulation 18 of the Conservation of Offshore Marine Habitats and Species Regulations 2017. These include candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas.
Horizontal directional drilling (HDD)	A method of cable installation where the cable is drilled beneath a feature without the need for trenching.
HDD temporary working area	Temporary compounds which will contain laydown, storage and work areas for HDD drilling works.
Jointing bay	Underground structures constructed at intervals along the onshore cable route to join sections of cable and facilitate installation of the cables into the buried ducts.
Landfall	The area (from Mean Low Water Springs) where the offshore export cables would make contact with land, and connect to the onshore cables.
Link boxes	Underground chambers within the onshore cable route housing electrical earthing links.
Mitigation areas	Areas captured within the onshore development area specifically for mitigating expected or anticipated impacts.
National electricity grid	The high voltage electricity transmission network in England and Wales owned and maintained by National Grid Electricity Transmission
National Grid infrastructure	A National Grid substation, cable sealing end compounds, cable sealing end (with circuit breaker) compound, underground cabling and National Grid overhead line realignment works to facilitate connection to the national electricity grid, all of which will be

	consented as part of the proposed East Anglia TWO project Development Consent Order but will be National Grid owned assets.
National Grid overhead line realignment works	Works required to upgrade the existing electricity pylons and overhead lines (including cable sealing end compounds and cable sealing end (with circuit breaker) compound) to transport electricity from the National Grid substation to the national electricity grid.
National Grid overhead line realignment works area	The proposed area for National Grid overhead line realignment works.
National Grid substation	The substation (including all of the electrical equipment within it) necessary to connect the electricity generated by the proposed East Anglia TWO project to the national electricity grid which will be owned by National Grid but is being consented as part of the proposed East Anglia TWO project Development Consent Order.
National Grid substation location	The proposed location of the National Grid substation.
Natura 2000 site	A site forming part of the network of sites made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive.
Onshore cable corridor	The corridor within which the onshore cable route will be located.
Onshore cable route	This is the construction swathe within the onshore cable corridor which would contain onshore cables as well as temporary ground required for construction which includes cable trenches, haul road and spoil storage areas.
Onshore cables	The cables which would bring electricity from landfall to the onshore substation. The onshore cable is comprised of up to six power cables (which may be laid directly within a trench, or laid in cable ducts or protective covers), up to two fibre optic cables and up to two distributed temperature sensing cables.
Onshore development area	The area in which the landfall, onshore cable corridor, onshore substation, landscaping and ecological mitigation areas, temporary construction facilities (such as access roads and construction consolidation sites), and the National Grid Infrastructure will be located.
Onshore infrastructure	The combined name for all of the onshore infrastructure associated with the proposed East Anglia TWO project from landfall to the connection to the national electricity grid.
Onshore preparation works	Activities to be undertaken prior to formal commencement of onshore construction such as pre-planting of landscaping works, archaeological investigations, environmental and engineering surveys, diversion and laying of services, and highway alterations.
Onshore substation	The East Anglia TWO substation and all of the electrical equipment within the onshore substation and connecting to the National Grid infrastructure.
Onshore substation location	The proposed location of the onshore substation for the proposed East Anglia TWO project.
Transition bay	Underground structures at the landfall that house the joints between the offshore export cables and the onshore cables.

27.1 Human Health Consultation Responses

27.1.1 Introduction

1. This appendix to **Chapter 27 Human Health** covers those statutory consultation responses that have been received as a response to the Scoping Report (2017), the Preliminary Environmental Information Report (PEIR) (2019) and Expert Topic Group (ETG) meetings.
2. Responses from stakeholders and the regard given by the Applicant have been captured in **Table A27.1.1**.
3. As Section 42 consultation for the proposed East Anglia TWO project was conducted in parallel with the proposed East Anglia ONE North project, where appropriate, stakeholder comments which were specific to East Anglia ONE North, but may be of relevance East Anglia TWO, have also been included in the consultation responses for East Anglia TWO.

Table A27.1.1 Consultation Responses Related to *Chapter 27 Human Health*

Consultee	Date / Document	Comment	Response
<p>The following comments were received prior to consultation on the PEIR and were in response to the Scoping Report or direct consultation with stakeholders. These comments were taken into account in the production of the PEIR.</p>			
<p>Affected Population</p>			
Public Health England	December 2017 / Scoping Response	The ES should clearly identify the development's location and the location and distance from the development of off-site human receptors that may be affected.	The proposed East Anglia TWO project's onshore extent is shown in Figure 27.1 as the onshore development area. Figure 27.1 includes buffers used to determine the potential human receptors affected.
Suffolk Coast and Heaths AONB Manager	12/06/2018 / ETG Meeting for Tourism, Recreation, and Socio-Economics	Requested that visitors were considered separately to local populations although accepted that as both are human populations the pathway from determinant sources to impacts would be similar.	The potential impacts to local populations has been considered in section 27.6.1 of this chapter and potential impacts to visitors have been considered in Chapter 30 Tourism, Recreation and Socio-Economics Together, Chapter 27 Human Health and Chapter 30 Tourism, Recreation and Socio-Economics cover all potential population effects.
Suffolk Destination Management		Raised that the impact assessment must consider the disparity of wider benefits and local impacts, particularly relating to onshore infrastructure	
<p>Air Quality</p>			
Public Health England	December 2017 / Scoping Response	<p>When considering a baseline (of existing air quality) and in the assessment and future monitoring of impacts these:</p> <p>Should include consideration of impacts on existing areas of poor air quality e.g.</p> <p>Existing or proposed local authority Air Quality Management Areas (AQMAs)</p> <p>Should include modelling using appropriate meteorological data (i.e. come from the nearest</p>	<p>The assessment of human health is based on Chapter 19 Air Quality which considers these aspects. This is included in section 27.6.1.2 of this chapter.</p> <p>Considering the comments from Public Health England (PHE) in relation to the low risk posed by offshore wind development, it would be disproportionate to conduct a second assessment.</p>

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		suitable meteorological station and include a range of years and worst case conditions) Should include modelling taking into account local topography	
The Planning Inspectorate	December 2017 / Scoping Response	The inspectorate agrees that this can be scoped out during operation	This is included only during construction in section 27.6.1 of this chapter, as agreed with the Planning Inspectorate.
Baseline			
The Planning Inspectorate	December 2017 / Scoping Response	The methodology for determining the baseline should be set out in the ES and agreed with relevant consultees.	The baseline is set out in section 27.5 of this chapter and was consulted upon through the PEIR (SPR 2019) and the provision of the Human Health Method Statement to PHE for their consultation.
Construction Impacts			
Public Health England	December 2017 / Scoping Response	Construction and decommissioning will be associated with vehicle movements and cumulative impacts should be accounted for.	The assessment of human health is based on Chapter 26 Traffic and Transport which considers these aspects of increased vehicle movements. This is included in the assessment and presented in section 27.6.1.5 of this chapter.
Public Health England	December 2017 / Scoping Response	Significant impacts are unlikely to arise from installations which employ Best Available Techniques and which meet regulatory requirements concerning emission limits and design parameters.	Relevant emissions are considered in the following chapters: <ul style="list-style-type: none"> • Chapter 18 Ground Conditions and Contamination • Chapter 19 Air Quality • Chapter 25 Noise and Vibration; and

Consultee	Date / Document	Comment	Response
			<ul style="list-style-type: none"> • Chapter 26 Traffic and Transport. <p>Human health impacts based on these chapters are included in section 27.6 of this chapter. The proposed East Anglia TWO emission limits are within the relevant regulatory requirements.</p>
Public Health England	December 2017 / Scoping Response	Within the EIA PHE would expect to see information about how the promoter would respond to accidents with potential off-site emissions.	<p>This is included in:</p> <ul style="list-style-type: none"> • Chapter 18 Ground Conditions and Contamination; and • Chapter 20 Water Resources and Flood Risk. <p>Accident response procedures are detailed further within the Outline Code of Construction Practice (OCoCP), submitted with this DCO application and secured under the requirements of the draft DCO.</p>
Contaminated Land and Land Quality			
Public Health England	December 2017 / Scoping Response	We would expect the promoter to provide details of any hazardous contamination present on site (including ground gas) as part of the site condition report.	<p>This is included in:</p> <ul style="list-style-type: none"> • Chapter 18 Ground Conditions and Contamination (Appendix 18.3 presents a Land Quality Preliminary Risk Assessment (PRA)); and • Chapter 21 Land Use.
Control of Major Accident Hazards (COMAH) Regulations			
Public Health England	December 2017 / Scoping Response	The EIA should include consideration of the COMAH Regulations.	The COMAH regulations require COMAH establishments to “Take all necessary

Consultee	Date / Document	Comment	Response
			<p>measures to prevent major accidents involving dangerous substances.”</p> <p>As noted by PHE, the construction and operation of an offshore windfarm is unlikely to include dangerous substances. Therefore, this aspect is not considered further in the human health assessment.</p>
Electro Magnetic Fields (EMF)			
The Planning Inspectorate	December 2017 / Scoping Response	The inspectorate agrees that this can be scoped out during construction and decommissioning	This is included only during the operational impact assessment section 27.6.2 of this chapter.
Public Health England	December 2017 / Scoping Response	In respect of electromagnetic fields, compliance with the ICNIRP guidelines should be highlighted.	This is included only during the operational impact assessment section 27.6.2 of this chapter.
Suffolk County Council & Suffolk Coastal District Council	December 2017 / Scoping Response	The cabling route and all power lines connections which may generate an Electro-magnetic radiation field and potentially impact on members of the public shall be comprehensively assessed and the details should be provided.	This is included only during the operational impact assessment section 27.6.2 of this chapter.
Employees			
The Planning Inspectorate	December 2017 / Scoping Response	The Inspectorate requires that impacts relevant to the health of employees during construction, operation and decommissioning should be included in the assessment.	The health of employees will be included for both construction and operation, section 27.6.1 and 27.6.2 of this chapter respectively. Impacts no greater than those identified for the construction phase are expected for the decommissioning phase.
Suffolk County Council & Suffolk	December 2017 / Scoping Response	A health and safety risk analysis for site workers and members of the public should be provided for the constructional and operational phases of the works.	This chapter provides an assessment of health effects to the public in section 27.6 of this chapter.

Consultee	Date / Document	Comment	Response
Coastal District Council			<p>Health risk of workers is additionally included in Chapter 18 Ground Conditions and Contamination.</p> <p>An initial human health risk assessment for various users was considered in the development of the Conceptual Site Model in Chapter 18 Ground Conditions and Contamination and is presented in Appendix 18.1. The effects to human health are considered in section 18.4.2 of Chapter 18 Ground Conditions and Contamination and impacts addressed in section 18.6.1.1 of Chapter 18 Ground Conditions and Contamination.</p>
Inter-relationships			
The Planning Inspectorate	December 2017 / Scoping Response	The ES should ensure that where reliance is placed on other aspect assessments in the ES those assessments do assess risk to human health if significant effects are likely.	This chapter follows best practice (Cave et al. 2017) as promoted by IEMA. The assessment in section 27.6 of this chapter follows the methodology in section 27.4.3 of this chapter that clearly shows the relationship with other chapters and assessments.
Perception of Risk			
Public Health England	December 2017 / Scoping Response	There is evidence that, in some cases, perception of risk may have a greater impact on health than the hazard itself. A 2009 report ¹ , jointly published by Liverpool John Moores University and the HPA, examined health risk perception and environmental problems using a number of case studies. As a point to consider, the report suggested: "Estimation of	Local community perception of the onshore construction and the risks that this may pose is managed through the extensive public engagement undertaken by the Applicant. This includes public information days and inclusion of public concerns in to the planning process. A summary of this

¹ Available from: <http://www.cph.org.uk/wp-content/uploads/2012/08/health-risk-perception-and-environmental-problems--summary-report.pdf>

Consultee	Date / Document	Comment	Response
		community anxiety and stress should be included as part of every risk or impact assessment of proposed plans that involve a potential environmental hazard. This is true even when the physical health risks may be negligible." PHE supports the inclusion of this information within EIAs as good practice.	process is presented in section 27.6.2.2 of this chapter. The report that PHE reference has been reviewed and is found to refer to projects with significant emissions or environmental impacts. As such it is not directly applicable to the construction and operation of an offshore windfarm or its onshore infrastructure due to the low risk to human health from emissions noted by PHE. Therefore, this will not be included in the health review.
Proportionality			
Public Health England	December 2017 / Scoping Response	Any assessments undertaken to inform the ES should be proportionate to the potential impacts of the proposal.	In order to be proportionate, this chapter provides a qualitative assessment based on evidence from supporting chapters and scientific literature. The scientific literature evidence base is presented in Appendix 27.3 .
Waste			
Public Health England	December 2017 / Scoping Response	The EIA should demonstrate compliance with the waste hierarchy.	This is included in Chapter 18 Ground Conditions and Contamination . Further detail is provided in the OCoCP, submitted with this DCO application and secured under requirements of the draft DCO.
Water			
Public Health England	December 2017 / Scoping Response	When considering a baseline (of existing water quality) and in the assessment and future monitoring of impacts these:	An assessment of health risk due to emissions to water quality has been developed qualitatively and informed by assessments for:

Consultee	Date / Document	Comment	Response
		<p>Should include assessment of potential impacts on human health and not focus solely on ecological impacts</p> <p>Should identify and consider all routes by which emissions may lead to population exposure (e.g. surface watercourses; recreational waters; sewers; geological routes etc.)</p> <p>Should assess the potential off-site effects of emissions to groundwater (e.g. on aquifers used for drinking water) and surface water (used for drinking water abstraction) in terms of the potential for population exposure</p> <p>Should include consideration of potential impacts on recreational users (e.g. from fishing, canoeing etc) alongside assessment of potential exposure via drinking water</p>	<ul style="list-style-type: none"> • Chapter 8 Water and Sediment Quality; • Chapter 18 Ground Conditions and Contamination; and • Chapter 20 Water Resources and Flood Risk. <p>Considering the comments from PHE in relation to the low risk posed by offshore wind development, it would be disproportionate to conduct a second assessment.</p>
Method Statement			
Public Health England	September 2018 / Method Statement	We are pleased to see that the comments we provided during the scoping consultation have been considered within the Human Health Method Statement. We have considered the submitted documentation and can confirm that we are satisfied with the methodology proposed for this chapter and look forward to reviewing the full assessment at a further consultation stage.	Methodology is described in section 27.4.3 of this chapter.
The following comments were made in response to the PEIR and were taken into account in the production of the ES.			
Public Health England	26.03.2019 Section 42 Consultation Response	The local community will experience impacts from a range of factors due to this and other local developments over an extended period. The range of impacts over such a long period may result in minor effects gaining increased significance to local communities and the vulnerable population within. It is	Information from Sizewell C New Nuclear Power Station PEIR is included within the CIA (section 27.7 of this chapter). The Sizewell B Power Station Complex has additionally been screened into the CIA presented in this chapter.

Consultee	Date / Document	Comment	Response
		unfortunate that the PEIR has not considered the latest consultation from Sizewell C; however, it is noted that the Section 42 applications for both developments were completed in January 2019. Many of the working assumptions within this PEIR may now need to be re-assessed in the light of this latest Sizewell C consultation. This will have particular importance to the assessment of construction staff accommodation needs, traffic and transport and the impact on the local health care system and community cohesion from the introduction of a large external workforce across a number of infrastructure schemes.	
Public Health England	26.03.2019 Section 42 Consultation Response	The assessment of cumulative impact should be reviewed using the latest PEIR from Sizewell C. Particular attention should be given to Traffic and transport impact, with particular regard to impacts on driver delay / stress and impacts on the safety and amenity of non-motorised users (NMU) and Potential impacts of increased vehicle movements on air quality. The applicant should consider the nearby development of Sizewell C, assess the cumulative implications on the proposed East Anglia TWO and ensure assessments and mitigation measures are consistent and interoperable.	Information from Sizewell C PEIR is included within the Cumulative Impact Assessment (section 27.4.4 of this chapter). The Sizewell B Power Station Complex has additionally been screened into the CIA presented in this chapter.
Public Health England	26.03.2019 Section 42 Consultation Response	The assessment of cumulative impact should be reviewed using the latest PEIR from Sizewell C. Particular attention should be given to the demand for health care services and community cohesion. The applicant should consider the nearby development of Sizewell C, assess the cumulative implications on the proposed East Anglia TWO and ensure assessments and mitigation measures are consistent and interoperable.	Information from Sizewell C PEIR is included within the Cumulative Impact Assessment (section 27.4.4 of this chapter). The Sizewell B Power Station Complex has additionally been screened into the CIA presented in this chapter.

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Public Health England	26.03.2019 Section 42 Consultation Response	Access is a wider determinant of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether it is likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing, which has been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements.	The ES considered the Effect of Reduced Access to Health Services in section 27.6.1.5 of this chapter using the transport assessment in Chapter 26 Traffic and Transport .
Public Health England	26.03.2019 Section 42 Consultation Response	Traffic and Transport is a wider determinant of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether it is likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing, which has been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements.	The ES considers the effect due to traffic in Chapter 26 Traffic and Transport . This has been drawn upon in this chapter and Chapter 30 Tourism, Recreation and Socio-economics where necessary.
Public Health England	26.03.2019 Section 42 Consultation Response	Socio-economics is a wider determinant of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether it is likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing, which has been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements.	The ES considers socioeconomic effect in Chapter 30 Tourism, Recreation and Socio-economics and draws upon this assessment in this chapter where necessary.
Public Health England	26.03.2019 Section 42 Consultation Response	Land Use is a wider determinant of health and wellbeing we expect the Environmental Statement (ES) to address, to demonstrate whether it is likely to give rise to significant effects. We have focused its approach on scoping determinants of health and wellbeing, which has been derived from an analysis of the wider determinants of health mentioned in the National Policy Statements.	The ES considers land use effects in Chapter 21 Land Use and draws upon this assessment in this chapter where necessary.

Consultee	Date / Document	Comment	Response
Public Health England	26.03.2019 Section 42 Consultation Response	<p>The scale and nature of the proposed development results in the need for very clear reporting on the temporal impacts and effects on the local population. In this context “temporary” impacts can extend over long periods. The scoping report usefully identifies that the temporal scope of impacts will be determined using the following definition:</p> <ul style="list-style-type: none"> - ‘Very short term’ relates to effects measured in hours, days or weeks (e.g. effects associated with cable laying activity past a particular dwelling); - ‘Short term’ relates to effects measured in months (e.g. requirements of the overall construction stage, such as workforce use of accommodation); - ‘Medium term’ relates to effects measured in years (e.g. local employment during construction accommodation); - ‘Long term’ relates to effects measured in decades (e.g. the operational stage). <p>The reporting within the PEIR should use the above definitions rather than generic temporary or permanent temporal descriptions to ensure a consistent, transparent and accurate approach to the report.</p>	<p>Temporal scope is defined in section 27.3.1.4 of this chapter. Definitions given in section 27.3.1.4 of this chapter are used throughout to assess construction and operational phase impacts in sections 27.6.1 and 27.6.2 of this chapter.</p> <p>The scope of the assessment and the methodology used were agreed with PHE prior to undertaking the PEIR, as presented in this table. The same methodology and scope are maintained for this ES.</p>
Public Health England	26.03.2019 Section 42 Consultation Response	<p>An approach to the identification of vulnerable populations has been provided but does not make links to the list of protected characteristics within an Equality Impact Assessment (EqIA). The impacts on health and wellbeing and health inequalities of the scheme may have particular effect on vulnerable or disadvantaged populations, including those that fall within the list of protected characteristics. The ES and any EqIA should not be completely separated.</p>	<p>The Human Health Method Statement agreed with PHE did not include the need for an Equality Impact Assessment. Protected characteristics of the Equality Act 2010 are discussed in section 27.3.1.3 of this chapter.</p>
Public Health England	26.03.2019	<p>The assessments and findings of the ES and any EqIA should be cross reference between the two documents, particularly to ensure the comprehensive</p>	<p>The Human Health Method Statement agreed with PHE did not include the need for an Equality Impact Assessment.</p>

Consultee	Date / Document	Comment	Response
	Section 42 Consultation Response	assessment of potential impacts for health and inequalities and where resulting mitigation measures are mutually supportive.	Protected characteristics of the Equality Act 2010 are discussed in section 27.3.1.3 of this chapter.
Public Health England	26.03.2019 Section 42 Consultation Response	The PEIR identifies how non-motorised user (NMU) will be impacted through the loss or change in formal Public Rights of Way (PRoW), open space and the existing road network. Active travel forms an important part in helping to promote healthy weight environments and as such it is important that any changes have a positive long term impact where possible. Changes to NMU routes have the potential to impact on usage, create displacement to other routes and potentially lead to increased road traffic collisions. The PEIR does not provide any data for NMU within the traffic assessments. Without such data it is unclear how the impact on NMU (pedestrians and cyclists) from the presence of large numbers of HGVs can be assessed. Similarly, no data has been presented on the usage of each PRoW affected by the scheme, nor does it identify the specific impact and mitigation to be put in place for each PRoW, for example through diversions. Diverted routes must be designed, installed and maintained to allow for access to the community. A scheme of this scale and nature can also provide mitigation opportunities to enhance the existing infrastructure that supports active travel, physical activity and access to green/blue space. We expect the proposal to contribute to improved provision of infrastructure that supports this type of activity.	Traffic impacts are assessed in Chapter 26 Traffic and Transport . The PRoW assessment and Outline PRoW strategy are also discussed in Chapter 30 Tourism Recreation and Socio-economics .