



SCOTTISHPOWER  
RENEWABLES

# East Anglia ONE North and East Anglia TWO Offshore Windfarms

## Applicants' Comments on Elizabeth Thomas' Deadline 11 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited

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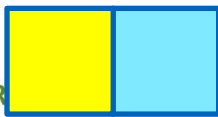
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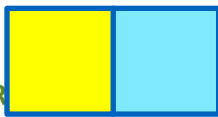
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Applicable to **East Anglia ONE North** and **East Anglia TWO**



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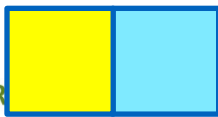
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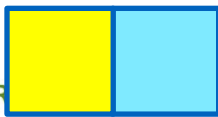
## Glossary of Acronyms

BCA	Ben Cave Associates
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ExA	Examination Authority
HGV	Heavy Goods Vehicle
IEMA	Institute of Environmental Management & Assessment
PHE	Public Health England
SPR	ScottishPower Renewables



## Glossary of Terminology

Applicant	East Anglia TWO Limited / East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 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 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.



# 1 Introduction

1. This document presents the Applicants' comments on Elizabeth Thomas' Deadline 11 submission – Post hearing submissions including written submissions of oral case (REP11-141).
2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's (ExA's) procedural decisions on document management of 23<sup>rd</sup> December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.



## 2 Comments on Elizabeth Thomas' Deadline 11 Submission

### 2.1 Applicants' Comments on Elizabeth Thomas' Deadline 11 Submission Post hearing submissions including written submissions of oral case (REP11-141)

ID	Elizabeth Thomas' Comment	Applicants' Comments
<b>Introduction</b>		
1	<p>My letter concerns the contributions by Scottish Power Representatives on Human Health during the Issue Specific Hearing 10.</p> <p>Times in the hearing are inserted for reference purposes</p>	Noted.
2	<p>It is regrettable the Applicant (Scottish Power Renewables) has not carried out more research into the area of Human Health and recognised the importance of how developments EA1North and EA2 will impact upon every aspect of the health of the communities in this area.</p> <p>The Hearing only served to highlight the lack of knowledge the applicant has within the area of Human Health.</p> <p>The Applicant failed to recognise the impact such a development will have on the local communities affected by the building of the cable route and the substations. Nor did they show they have taken responsibility for the future effects of such developments during the lifetime of the sub stations.</p>	<p>The Applicants undertook a comprehensive assessment in line with current guidance – <b>Chapter 27 Human Health</b> (APP-075). As highlighted in the hearing (<b>Written Summary of Oral Case Issue Specific Hearing 10</b> (REP8-095)) the Applicants developed the methodology for the assessment with Ben Cave Associates (BCA) who have been instrumental in developing health impact assessment for environmental impact assessment (EIA) (through the International Association for Impact Assessment and European Public Health Association) and have contributed to the development of Public Health England (PHE) guidance.</p>
3	<p>It is unacceptable that, from the outset, the Applicant failed to deliver an in depth document dealing with Human Health, conflating and burying this important area within other submission documents for their development thus serving only to fudge the effect of this</p>	<p><b>Chapter 27 Human Health</b> (APP-075) was a standalone chapter. Traditionally health was a subset of the air, noise, and contaminated land assessments only (this was the model used, for example, in the Hornsea Project Three Offshore Wind Farm (DCO application made in 2018) which did not prepare a standalone</p>



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	<p>development's impact on the discrete areas of Human Health i.e. emotional physical and mental well-being. It highlights the lack of consideration the Applicant gives to the health of the local communities here in East Suffolk favouring the socio economic enhancement of the larger conurbations.</p>	<p>health assessment). So, for offshore wind, the Projects are some of the first to undertake this type of integrated assessment.</p>
<p><b>4</b></p>	<p><b>25:00.29.15</b></p> <p>Mr Innes focuses on the high level aspects of Human Health. His vigorous advocacy for wind power as the answer to national economic development underscores how the Applicant views this area of East Suffolk as dispensable in the pursuit of economic corporate gain.</p> <p>Both Mr Pizzolla and Mr Innes recognize the lack of information and guidance available from regulatory bodies.</p> <p>It is unacceptable they used this use as an excuse not to compile detailed information in the field of Human Health?</p> <p><i>"documents which are specific to wind farms don't exist re impact on Human Health"</i></p> <p>If this is the case why since the inception of this project has the Applicant not drawn upon examples from other sources to compile a detailed up to date document?</p> <p>Wylfa Newydd Project 8.19 Health Impact Assessment Report Or indeed their own company Ibedrola who have produced several documents on the Impact of Wind Power developments on communities.</p>	<p>In the hearing, the Applicants highlighted that health impact assessment in EIA was emerging practice. This is because it was not a requirement of EIA until changes to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Therefore, the Applicants used the available guidance and the above-mentioned development of methodology with BCA and consultation with PHE to produce the assessment.</p> <p>The Applicants therefore undertook a comprehensive assessment in line with current guidance and reject the assertion that a rigorous assessment has not been undertaken.</p> <p>The Appendices to REP8-095 include guidance from PHE and a discussion document from the Institute of Environmental Management &amp; Assessment (IEMA) on developing health impact assessment.</p>





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	<p><b>30:26</b></p> <p>It is not acceptable that in 2021 Mr Pizzolla states a reason not to compiling a rigorous Human Health document for EA1North and EA2 is because other projects he was involved in did not require a document on Human Health.</p> <p>If this is, as he states a “developing practice” All the more reason for the Applicant to ensure they have covered every area of the impacts of their development on Human Health, not only economic growth of the nation. Benefits of research in this field are available and have been an important inclusion in Suffolk Local Plan and Government policy</p> <p><b>20:39</b></p> <p>Why in Mr Pizzolla’s view should the length of the project have a bearing on whether or not it impacts on Human Health? This is a nonsense.</p> <p>Any project long or short has an impact on the lives of those affected by that project. Mr Pizzolla’s interpretation of Long or Short is a subjective statement and creates a flawed basis for decisions about the level of Human Health submission and resultant quality of documentation required for a project of this length and proportions.</p> <p><b>32:10</b></p> <p><b><i>“we aren’t one of those projects which are going to have a massive residual impact a lot of the impacts we are talking about .....will be temporary or episodic”</i></b></p> <p>The length of these projects will be in the region of 12 years and 10 hours of daily industrial activity. In addition there will be twenty</p>	



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	<p>years of living with a working substation within 200 metres of homes.</p> <p>How can the Applicant justify this as temporary and episodic. Those living and working in the proximity of the project will not consider this as temporary or episodic.</p> <p><b>30:26</b></p> <p><b><i>“The Applicant has not done a health impact assessment for this type of development before “</i></b></p> <p>This is no reason for not carrying out a Human Health Assessment now. This disregard of the effects of EA1NAnd EA2 development in all its areas is a reflection of how little value Scottish Power Renewables place upon the people in the communities of East Suffolk. In their view we are dispensable.</p> <p>It is extremely worrying for the future progress of this development and reflects a complete lack of professionalism when both the Applicant's “experts” present conflicting views on Human Health data and indeed suggest it is a reason not to produce a thoroughly researched document.</p> <p><b>35:33</b></p> <p>Mr D Smith <b><i>“We liaised with Public Health England and they were content with the methodology and indeed their representation suggests they are happy with what we have done”</i></b></p> <p><b>1:11.07</b></p> <p>Mr Pizzolla <b><i>“when we consulted with Public Health England ...we got very little response”</i></b> What confidence can we have in</p>	



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	<p>the conclusions the Applicant has reached if they are drawing upon such weak guidance to reach their conclusions. Using this feeble argument to shore up the effect of the Applicant's development upon the health of the people who live in East Suffolk leads the Applicant to the conclusion:</p> <p><b>1:14.06</b></p> <p>I must assume the conclusions on which the Applicant's findings are based, are founded on their own interpretation for the Applicant's own benefit and not based upon credible data. Simply they have made up the results to suit their own ends.</p> <p><b>1:16.59</b></p> <p>Of concern is the reliance on the application of the Rochdale Envelope as a basis for the applicant's reasoning as to how the project will progress. It appears this has been used as a means not to deliver a robust Human Health assessment. <i>"so there is an element of outline and there is and element of progression throughout the project"</i></p> <p>This may be acceptable within the area of construction when dealing with reordering bags of concrete or cable drums but not in the area of Human Health. A few spoiled bags of concrete can be replaced but the damaged mind of a resident living next to the development is a different prospect.</p> <p><b>1:23.53</b></p> <p><b>Ms Young "As we refine the design we're able to make more commitments and refine further"</b> It is not acceptable the communities affected should be in a "wait and see" situation they need to understand now what is planned not through a piecemeal</p>	



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	<p>drip feed process. What confidence is there in a contractor who at the outset admits to “making it up as they go along”</p> <p>Have they presented all the facts to enable the ExA to make a decision? If this project is accepted will The Applicant throw out any previous submissions and work from a completely different set of rules using “It is an emerging process” as the get out clause for destruction of the health and well-being of this area?</p> <p>To say it is an evolution is unacceptable leaving communities unsure and anxious. Ms Young speaks at length about the many public meetings held, iterating at length applauding Scottish Power on how well the Applicant communicated with organisations, assuring the ExA how the communities have been part of a discussion. That is only her view.</p>	
5	<p><b><i>Dispelling anxiety and uncertainty we’ve been very mindful of that</i></b></p> <p>Addressing uncertainties at a public meeting does not eliminate concerns or anxieties. The Applicant has made a grave error assuming because things have been presented to the community it has allayed fears or worries.</p>	<p>As stated in <b>Section 4.2 Perception</b> of REP8-095, the Applicants recognise that some individuals will be affected by the Projects more than others and that it is not simply a matter of explaining the details of construction to make these issues recede.</p> <p>As discussed in the hearing, the Applicants process for dealing with health issues is to minimise or avoid potential sources of physical harm. This requires the use of appropriate equipment, vehicles (such as Euro VI standard Heavy Goods Vehicles (HGVs)) at-source attenuation (acoustic barriers), HGV routeing, work hours scheduling etc to minimise the potential impacts to levels which are acceptable and agreed with the relevant authorities. These are all managed through the DCO requirements and the certified documents (i.e. management plans) which have been developed pre-Application and refined throughout the examination.</p>



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		<p>The area that cannot be managed in a standard way is anxiety. The Applicants recognise that communication can play a big part in reducing anxiety but does not fully alleviate this.</p> <p>The Applicants maintain that communication is vital to reduce anxiety. For example, in many cases issues that have been raised during the examination have been resolved through further work and discussion between the Applicants and the relevant authorities. It is important to communicate these outcomes to ensure that issues have been dealt with.</p>
6	<p><b>Conclusion</b></p> <p>For all this applauding of communication on the part of Scottish Power the evidence of the disregard the Applicant has for the communities and the lack of communication became evident as from the coast to Friston there was sudden appearance of road management signs early in May. The resultant high levels of uncertainty and distress experienced only served to highlight the concerns the residents have about the working practices of the applicant within the community. Residents had suddenly to deal with traffic restrictions, requirement for unplanned diversions to carryout daily commitments , alteration to work schedules.</p> <p>This uncertainty continues as the countryside is dug up in swathes from the coast to the proposed site. Resultant traffic, personnel and heavy plant, litter our beautiful countryside restricting pedestrian and vehicle access. Is this what is referred to as <i>“an emerging process and dispelling anxiety and uncertainty ?”</i></p> <p>Is an email only a matter of hours prior to heavy plant movements closing the roads classed as an acceptable means of communication with the communities?</p>	<p>The placement of road management signs are required to ensure the safety of members of the public and the Applicants' personnel involved in the onshore ground investigations. The Applicants notified the local communities of the pending ground investigation works, as described in the <b><i>Applicants' Statement regarding Ground Investigations Works</i></b> (REP10-029).</p> <p>The onshore ground investigations have been and continue to be appropriately managed by the Applicants. Communities are kept up to date on the onshore ground investigations by the Applicants' stakeholder communications team through a dedicated webpage and e-mail notifications.</p>



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	<p>Where and who is the promised Mentor Liaison Officer?</p> <p>At this time the residents experience for real blocked footpaths, roads littered with signage, damaged vehicles due to blown over signage. It is unacceptable that the Applicant can suggest the impact on Human Health is “not significant and anxiety is perceived and not real”. It is very real and significantly affecting our daily lives now while the project is in examination and any decision has been made.</p>	
7	<p>The ExA must challenge Scottish Power Renewables on their findings that the Impact of their Development</p> <p><b>Not significant</b></p> <p><b>Anxiety is perceived</b></p> <p><b>Not real</b></p> <p>The EX A must insist a robust and thorough document on the Impact on Human Health is compiled and includes detailed studies into the emotional physical and mental health of the communities not restricted only to the wider economic health. It is evident Scottish Power Renewable hold these communities in small regard and any fine statements about how well they have dispelled anxieties are all empty words. It is quite apparent the Applicant will renege on any commitment made and ride roughshod over our communities with total disregard for the health or wellbeing of anyone in them .</p>	<p>The Applicants undertook a comprehensive assessment in line with current guidance and reject the assertion that a rigorous assessment has not been undertaken.</p> <p>The Applicants reiterate that commitments made in the Applications and subsequently throughout the Examination are secured through the DCO requirements and the certified documents (i.e. management plans such as the Code of Construction Practice (CoCP)) which are legal requirements. Prior to the commencement of works, the final management plans would need to be approved by the named relevant authority in consultation with any specified stakeholders.</p>