

From: [REDACTED]
To: [Hornsea Project Three](#)
Cc: [REDACTED]
Subject: RE: Open Floor Hearing on the 25 of March 2019
Date: 28 March 2019 08:52:50
Attachments: [image001.png](#)
[PLANNING INSPECTORATE ORSTED HORNSEA PROJECT THREE EXAMINATION PROCESS V2.pdf](#)

Dear Karl-Jonas,

It was a pleasure to meet you on Monday and thank you for running the meeting so sensitively.

Please find attached a written text of what I had to say at the meeting. This is in .pdf format but if you require a Word file I can of course provide that in response to a specific request for it in that form.

I would of course appreciate an acknowledgement of receipt of this document and am also copying this document to various people from the Corpusty and Saxthorpe Parish Council and from the local area, all of whom were at the meeting.

If I can assist you and the examiners in any way by way of clarification, I will of course be perfectly happy to do so.

I do not know whether the Applicants will be given an opportunity to comment on my submission, but if so, I would think it a matter of politeness and good practice for me to be able to comment in turn on their comments, particularly in view of [REDACTED] statement on Monday that the project had been considered by Public Health England. This could not have been the case or she has mis-stated or misunderstood the PHE position on these matters, no doubt inadvertently. I have taken the liberty of citing some of the evidence from PHE and from Imperial College, London to ensure that the Examiners are able to take account of the best current objective scientific opinion. I note that [REDACTED] appears to have no formal scientific training, being listed as having a degree in law from UCL and being "an advocate and legal advisor to the Applicant, focusing on compulsory acquisition and land assembly matters."

Once again, thank you for your help and advice,

Regards,

Tony Barnett

PS with regard the statutory consulting position of the Neighbourhood Planning Authorities, the 2008 Act is of course prior to the Localism Act. I have taken advice on this matter from one of the lawyers on our Parish Council who is a specialist in planning law. But this does not matter for the moment.

From: Hornsea Project Three <HornseaProjectThree@planninginspectorate.gov.uk>
Sent: 20 March 2019 15:16

To: Tony Barnett [REDACTED]
Subject: RE: Open Floor Hearing on the 25 of March 2019

Dear Tony,

I have spoken to my colleagues and relevant Neighbourhood Planning Authorities are not statutory consultees under the 2008 Planning act.

Kind regards

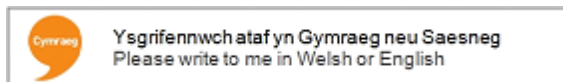
K-J

Karl-Jonas Johansson
Swyddog Achos/ Case officer
Cynllunio Seilwaith Cenedlaethol/ National Infrastructure Planning
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Wê/ Web: www.gov.uk/government/organisations/planning-inspectorate
(Gwaith achos ac apeliadau/ Casework and appeals)
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From: Tony Barnett [REDACTED]
Sent: 13 March 2019 14:36
To: Hornsea Project Three <HornseaProjectThree@planninginspectorate.gov.uk>
Cc: [REDACTED]
Subject: Open Floor Hearing on the 25 of March 2019

Dear Madam/Sir,

I am requesting the right to attend and speak at this event in the following two capacities:

1. I occupy a property adjacent to the B1149
2. I am a parish councillor for Corpusty & Saxthorpe

I understand you require advance notice of a person's wish to attend/speak at such a meeting and look forward to receiving your reply.

Professor Tony Barnett

London School of Hygiene and Tropical Medicine

PLANNING INSPECTORATE ØRSTED HORNSEA PROJECT THREE EXAMINATION PROCESS

OPEN FLOOR HEARING 25TH MARCH, MERCURE NORWICH HOTEL 1900 HOURS

QUESTIONS AND STATEMENT FROM PROFESSOR TONY BARNETT

ON BEHALF OF CORPUSTY AND SAXTHORPE PARISH COUNCIL

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AS A RESIDENT OF CORPUSTY AND SAXTHORPE

FROM THE POSITION OF PROFESSORIAL RESEARCH FELLOW, LONDON SCHOOL OF HYGIENE AND TROPICAL MEDICINE

CONTACT [REDACTED]

This document has three sections.

In each of these sections information is provided in a preamble and a question is then posed in the light of that introduction.

These questions are simultaneously:

(a) suggestions from Corpusty and Saxthorpe Parish Council and from the local community that the Examiners consider a number of technical concerns so far omitted from consideration;

(b) indications of new areas of information that should be available to the Examiners and form part of their deliberations.

Not to attend to such questions in their final adjudication would be for the Examiners to disappoint the public who so clearly expressed their opinions and anxieties at the meeting on 25 March 2019.

PREAMBLE 1

I¹ do not object to use of wind powered energy generation.

I wish to draw to the Examiners' attention several issues to do with the public health effects of the construction process as it impacts upon people and communities living along the route of the B1149. I also wish to draw to the Examiners' attention some well-known technical issues associated with project costing methods. These should be taken very seriously by them in any assessment of the viability and true costs of the project.

I approach the Examiners in the spirit of exploring and ensuring proper consideration of public health risks and costs to wellbeing generated by this national infrastructure project as currently conceived.

The Examiners will have noted at the meeting on 25 March, individuals, families and communities are experiencing great anxiety and distress because of the way that project

¹ Note the first-person singular pronoun is used throughout, however opinions expressed in this document are endorsed by Corpusty and Saxthorpe Parish Council.

execution has been envisaged. This upset is not a passing experience, nor is it special pleading; it reflects present and potentially long-term cost to people and communities and should be considered as such by the Examiners.

All projects, national or local, have costs. I begin by outlining some technical economic issues concerning calculations and consideration of cost as a general background to the work of an enquiry such as this. These fall into three broad groups:

- a. Costs which are clearly money costs: an example is the cost of land acquisition for a project on an open and fair market.
- b. Costs which are not directly financial but may *be more or less satisfactorily* translated into money costs; an example might be a farmer's loss of the use of her or his land while the project uses it for a project related purpose over a number of agricultural seasons.
- c. *Costs which are not at all easily translatable to money terms*; this is particularly germane to the present examination and examples might include health effects, reduction in life expectancy, epigenetic effects, late developing illness associated with medium or long term exposure to particulate matter generated by project related additional traffic. Such effects may be very long term in their consequences. These types of costs are all too easily ignored although they are often very serious given their long-term effects on human health and welfare. In addition, such medium to long term effects on morbidity and/or mortality including reduced length and/or quality of life, are all too easily dismissed by intending developers because (as with tobacco related morbidity or mortality) the causal chain is long and there are likely to be confounding factors.

Because these costs are difficult to quantify, when they are considered they are often represented either by inadequate proxy indicators or ignored entirely. The costing process often ignore the externalisation of project costs onto populations outside the project's immediate spatial area and outside its immediate time duration. It is for this reason that the Examiners are invited to bear in mind the following question together with further technical issues and requests for information contained in question 3.

It is against this background that I pose the first question:

- 1. How far has costing of this national infrastructure project taken account of direct and indirect health, welfare and road safety costs to the local community over the medium and long term?**

PREAMBLE 2

To turn to other health and welfare costs related to the project, the Examiners are encouraged to explore the following specific issues:

- (a) the medium- and long-term effects of **particulate emissions** (particularly but not exclusively of fine particulate matter [PM_{2.5}]) associated with additional traffic moving along or waiting in holding areas before moving along the B1149 and other roads from vehicle waiting areas in Oulton and / or Cawston. These costs to health are broader than PM_{2.5} alone and the Examiners may want to take account *inter alia* of the report prepared for DEFRA by Ricardo Energy & Environment in 2018 and submitted in February 2019². In addition, the Examiners will want to take into its purview the very considerable evidence available from Public Health England (PHE) and other sources concerning the health and welfare impacts of particulate emissions and other traffic related pollutants. As an example of this plethora of evidence, PHE states in relation to particulate matter and other traffic related pollutants that there is: “a strong case for investing in prevention and early intervention at local and national levels, as well as allowing the necessary resources for the cases that cannot be prevented.”³ Furthermore, PHE states as a general guide to engaging with these issues that:

“Taking effective local action to reduce air pollution and improve public health requires an inclusive, multi-disciplinary approach across local authority functions involving spatial and transport planners, environmental and public health teams, local political and community leaders and the public. Coordination between local areas is also vital to align approaches and avoid displacement of pollution from one populated area to another.”⁴

This document has been prepared in the spirit of this advice.

The solicitor⁵ who appeared for Ørsted at the Open Floor Session stated verbally and on record that the Applicant considered that the “impacts would be negligible at best”⁶. Such a claim is contrary to the publicised opinion of PHE and indeed to a plethora of both long standing and recent expert opinion⁷. The medium and long term impacts of exposure to PM_{2.5} considered alone is illustrated in the following projections published by PHE⁸ in which it is stated that there is strong evidence that these emissions alone (not taking into consideration other noxious emissions which will be associated with increased traffic movements associated with the

² Air Quality damage cost update 2019, ED 59323 | Issue Number 2.0 | Date 27/02/2019, contact Sally Whiting Ricardo Energy & Environment, Gemini Building, Harwell, Didcot, OX11 0QR, United Kingdom

³ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution> - accessed 25 March 2019;

⁴ Ibid.

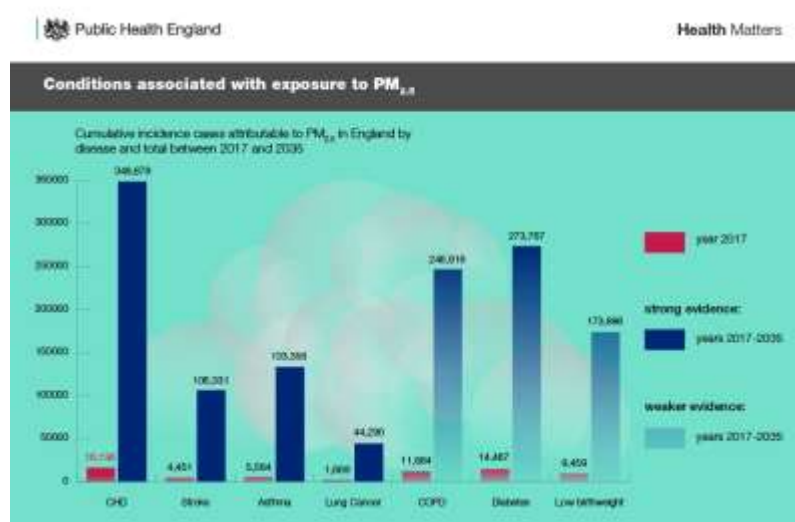
⁵ Ms Claire Brodrick? from Pinsent Masons LLP

⁶ Presumably she meant “at worst”.

⁷ <https://www.nice.org.uk/guidance/ng70> - NICE is the The National Institute for Health and Care Excellence;

⁸ <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution> - accessed 25 March 2019;

project) could be expected to increase rates of coronary heart disease (CHD), stroke, asthma and lung cancer, together with other evidence of Chronic Obstructive Pulmonary Disease, diabetes &c – all of which impose costs on individuals, families, communities, the economy and the public purse arising from additional demands on the resources of the NHS. Other significant objective evidence of the effects arising from increased traffic associated with the project are cited below.⁹ The Examiners should note that there is some evidence of very long-term epigenetic¹⁰ changes (changes in the human genome associated with environmental pollution) arising from vehicle emissions.¹¹



(b) the effects of this project on **ambulance response times** for people living in this area and in the catchment area more generally in North Norfolk; recent data suggests that this area has some of the poorest response times in England and Wales. The Examiners will know that response times can be measured in several ways, notably from receipt of call to arrival of ambulance crew on site and from receipt of call to arrival of patient at an appropriate hospital, in most cases this means the Norfolk and Norwich Hospital. Current *median*¹² time for arrival of crew

⁹ https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine_Partuculate_Matter_in_the_UK.pdf
<https://www.imperial.ac.uk/media/imperial-college/grantham-institute/public/publications/briefing-papers/New-solutions-to-air-pollution-challenges-in-the-UK-LFSP-BP.pdf>
<https://www.imperial.ac.uk/news/184333/ways-imperial-researchers-tackling-pollution-crisis/>

¹⁰ For introductory information about epigenetics, see: Nessa Carey *The Epigenetic Revolution* Icon Books, London 2011.

¹¹ Professor Paul Vineis, Professor of Environmental Epidemiology at Imperial College, London suggests on a precautionary basis that: "We have found epigenetic marks of exposure to air pollution – that is, features not due to structural change in the sequence of the DNA, but due to gene regulation.."

<https://www.imperial.ac.uk/news/184333/ways-imperial-researchers-tackling-pollution-crisis/>

¹² Note this is neither the mean nor the modal time. it is merely the central value of the distribution. The median time is a bad representation of the way that delays affect people's lives, pain and deaths.

at the patient in the NR11 area is 18.37 minutes¹³. This is of course not the time from receipt of call until arrival of ambulance at the N&N Hospital. Neither is it the mean time.

- (c) In her response (6 March 2019) to my enquiry about project related traffic Ms Emily Woolfenden of Orsted stated as follows:

“In respect to both links 60 and 76 (the B1149 to B1354 junction; and the B1149 from Saxthorpe roundabout to Heydon Junction), the traffic flows for Hornsea Three are expected to peak at 232 two-way movements of light vehicles and 162 two-way movements of HGVs on a daily basis (please note that the two-way movements figures stated allows for both the outward and return journey and therefore reflects the total number of daily movements). These maximum vehicles flows are associated with particular construction activities occurring within the onshore cable corridor in this area (i.e. laying of the haul road). Traffic during other activities are anticipated to be lower than this maximum.”

I make that a total of 788 additional single movements over an unspecified “peak” and allowing for an eight hour working day that suggests 1.625 additional movements associated with this project per minute.

It is against this background that I pose my second question:

- 2. What effects will additional project traffic movements along the B1149 have on the 100 metre particulate emission plumes along both sides of the B1149 during the project’s life and over the following 30 years taking account of: (i) the particular susceptibility of the ageing population characteristic of the area and (ii) the child population in the area and (iii) the concerning model outputs provided in the 2018 Ricardo Energy & Environment report cited above; what will be the effects of this additional traffic on ambulance response times in North Norfolk during the construction period once again taking into consideration the ageing population in this area and its special needs in relation to emergency responses; and what impact will additional traffic generated by the extensive housing developments planned over the next several years at Corpusty and Saxthorpe have on project related and other traffic movements¹⁴ including that generated from the many additional homes recently constructed in Holt, some for people who commute to Norwich daily and whose movements have already increased the burden of traffic on a narrow country road?**

¹³ <http://www.ambulance-responsetimes.co.uk/>, accessed 25 March 2019.

¹⁴ Orsted was approached for its comments on the Corpusty and Saxthorpe Neighbourhood Plan but did not respond to this invitation.

PREAMBLE 3

Modelling of project impacts usually involve specification of variables assumed by modellers to be “significant”. Choice of “significant” variables may exclude factors which are significant to local communities. Model variables are often represented by proxy indicators, and finally, technical models can be constructed with both conscious and unconscious bias and/or to support a particular case, such bias being hidden by a mathematical language inaccessible to all but a few experts¹⁵.

- 3. Will the Examiners obtain and consider complete lists of all models used in planning this project, lists of all variables considered in these models, lists of all proxy indicators the detailed formulae deployed, and will they critically appraise these models and comment on them in their adjudication? Will they share this information with the potentially affected communities so that they in turn may provide suggestions for variables which are of concern to them, but which are likely to have been omitted by modellers in planning this project?**

¹⁵ M.R. Banaji & A.G. Greenwald, *Blind Spot: Hidden biases of good people*, New York, Delacorte Press, 2013.