

Dear Planning Inspector,

I have looked at the Norfolk Boreas Offshore wind farm consultation report appendix 9.7 Norfolk Vanguard Health Outgoing Documents and they state “there is no defined or recommended procedure or guidance for assessing the significance of health impacts within the context of an EIA.....” I find their following methodology alarming and very questionable.

I refer to “Norfolk Boreas Offshore Wind Farm Chapter 27 Human Health”

Table 27.2 Factors Characterising Population Sensitivity (Cave et al., 2017a)

“ Inequalities Deprivation Health status Life stage Outlook”

Table 27.2 implies that the applicant assumes that the people who object to the project, would be included in the category of people with “Higher sensitivity”

They assume people of Higher sensitivity fall into the following groups in society (which I find discriminatory) they describe them as having “High levels of inequalities or inequities” “High levels of overall deprivation” “High levels of poor access to financial, social or political resources” . “High levels of poor health and/or disability” “Presence of dependants (particularly the elderly or children), pregnant women, shift workers or the economically inactive.”

The table suggest that people with a higher sensitivity give “Presence of groups with strong views or high degrees of uncertainty about the project who may anticipate risks to their health and thus be affected by not only actual changes, but also by the possibility of change”.

If I have interpreted this correctly, being highly sensitive, I find this very offensive.

This leads me onto the following quote, from “NIMBYism and community consultation in electricity transmission network planning”. Cotton, M. and Devine-Wright, P. (2010)

“NIMBYism is neither irrational nor necessarily unethical. Individuals behave rationally by rejecting personal disadvantage in order to achieve advantages for others, and in the context of aspects such as potential childhood leukaemia risks, the acceptance of personally elevated risks to help others is supererogatory, i.e. virtuous ‘beyond the call of duty’ (Peterson and Hansson 2004). When members of a local community are required to accept a risk exposure not imposed on others, they may legitimately ask why they and not others are selected. Leaving aside the pejorative connotations of the NIMBY label, it does however raise significant questions over the spatiality and power relationships involved in the distribution of project siting impacts.”

This makes me question if the applicant’s choice of methodology is fair or iniquitous?

Also, in their response (at deadline 3) to the concerns of myself and family, the applicant has used historical comparisons of smaller sites to try and reassure us, but there has not been a

substation of this scale built in such close proximity to a population before, so this is not a helpful response.

I am not reassured by the response to REP2-101 "There is no prescribed required distance for electrical infrastructure from residential areas. In urban areas, high voltage electrical substations can be sited adjacent or amongst residential areas".

BUT this is not an urban area with a small substation.

I am not reassured with the statement in response to REP2-101 "No terrorism attack has ever occurred to a substation on UK soil and, on this basis, it is reasonable to say that the risk of terrorism is low." They also state "The risk of substation fires is historically low"

But Why put any human lives at risk?

27.6.3.2 Air quality effects 189. During construction, there is potential for air quality to be temporarily affected by dust and fine particulate from construction, and emissions from construction vehicles.

They determine All Health impacts to be negligible or low, but breathing in fine particulate matter is irreversible, however small or infrequent. I am not reassured when they state "The potential for nuisance-type dust effects is therefore expected to be occasional and limited. For finer fractions of dust precipitation rates would be slower, affecting a wider area and thus more people. However, exposure is expected to be low due to the finer dust particles dispersing (reducing in concentration) with increased distance. At these levels it is unlikely that there would be changes in the risk of developing a new health condition or of exacerbating an existing condition.

www.lunghealth.org Many lung diseases are caused by inhalation of dust. The dust particles remain in the lung where they can cause inflammation or fibrosis (scarring). The effects of damage from inhaled mineral dusts may not show up for many years, so patients may not develop symptoms until long after they are no longer exposed to these dusts.

As construction will be carried out over many months/years, air quality for nearby residents should not be dismissed so lightly.

Also, Government guidance reiterates the importance of planning, "..... Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable." and "The views of local communities likely to be affected should be listened to."

Please can I strongly request that the substations are moved further away from Necton and Ivy Todd, to fully safeguard the health and wellbeing of all residents? Thank you.

Yours faithfully,

Patricia Lockwood