

**TONY BARNETT ON BEHALF OF CORPUSTY & SAXTHORPE PARISH COUNCIL  
17 APRIL 2023**

**REGARDING THE APPLICATION BY EQUINOR NEW ENERGY LIMITED FOR AN  
ORDER GRANTING DEVELOPMENT CONSENT FOR THE SHERINGHAM SHOAL  
OFFSHORE WIND FARM EXTENSION PROJECT AND DUDGEON OFFSHORE  
WIND FARM EXTENSION PROJECT**

**FURTHER INFORMATION IN RESPONSE TO THE APPLICANT'S COMMENTS IN  
DOCUMENT # C282-BS-Z-GA-00014 IN ELABORATION OF VERBAL COMMENTS  
AT THE EXA OPEN FLOOR MEETING AT GRESHAM'S SCHOOL ON 29 MARCH  
2023.**

**ID 10:**

1. Our comments, submitted at some length to the ExA, explain why the methodology and methods deployed by the Applicant are inappropriate and insufficient to elicit any proper understanding of the human health and wellbeing effects of their project on communities in Norfolk and indeed more widely in the region.
2. The Applicant in their response explain precisely and with some elaborate but irrelevant citations that "the assessment of human health (APP-114) has not been approached from an economic/project planning perspective. It has been approached through the requirements of the UK legislation, policy and guidance as set out in Section 28.4.1 Policy, Legislation and Guidance, ES Chapter 28 of the Health (APP-114)." In the light of these we say that:
  - a. The Applicant has not responded to the extensive critique which we submitted. Instead, they have chosen to avoid responding by quoting/citing precisely and again evidence of the inappropriate method and methodology they have adopted.
  - b. We ask the ExA to enquire why the Applicant has not engaged with the substance of our evidence.
  - c. A cynic might consider that the Applicants have not only marked their own homework, but they have also chosen to answer the wrong question, one they have chosen themselves rather those which Corpusty & Saxthorpe Parish council has posed to them through the ExA.
  - d. In particular they have not explained and seem to have lost sight of our question as to why they have not used the method advised by the UK Government's Green Book.
  - e. On closer examination the ExA may consider along with us that this is a very serious omission. In so saying, we note the following:
    - i. the assertion that the treatment of wellbeing might not be Green Book compliant is significant. It is surely difficult for an application for what is effectively a national-policy driven investment **not** to tick all the Green Book boxes - in spirit as well as legal requirements? The Applicant has signally failed to recognise the importance of this aspect of compliance.

- ii. In addition, the Green Book requires appraisal of options not selected, for example an OTN or the options of offshore transmission. Here again we have evidence of serious methodological flaws in the Applicant's approach, and must pose the further question "were the relative community impacts of these and any other options considered and, if so, what did such appraisal(s) suggest?".
- f. The Applicant says that their methodology and methods were discussed "at a meeting on 6 April 2022 with the Public Health team at Norfolk County Council to agree the methodology and the approach to assessment. Norfolk County Council acknowledges this engagement and states that the methodology for the Health Impact Assessment is appropriate and based on best practice." However, we suggest that the ExA might consider that the Applicants have not produced any evidence of this consultation or minutes of the meeting.
- g. In the absence of such evidence, we made a personal request to Dr Louise Smith, the Director of Public Health for Norfolk County Council. This was unsuccessful as she was evidently in the process of resigning from her post.
- h. For this reason, we endeavoured to obtain this information through our County Councillor. Unfortunately, his request for this information was not called at the most recent full meeting of Norfolk County Council and further action on his part has now been prevented by the advent of the local government elections.
- i. In the light of these delays, we have submitted a Freedom of Information request as follows: "... seeking the minutes of this meeting, including who attended, details of the discussion, any notes which were taken in the course of the meeting and the decisions arrived at." As any information received will be out of time for the current submission, the ExA might consider requesting access to this information so that it can properly explore the degree of detail with which these matters were considered by the "Public Health Team" and the expertise they had to hand to consider these questions.

**ID 33:**

- 3. At ID-33 the Applicant notes that "REP1-073 (para 11) submits a list of questions as requested by Ms Menaka Sahai at the Public Examination in Norwich on 17 January 2023. The Applicant notes that these comments are directed to the ExA for consideration.
  - a. The ExA will detect that this is an evasive response. It deploys a certain *faux naive* to suggest that the questions were addressed to the ExA rather than doing what should have been obvious, answer the questions which were addressed to them through the ExA.
  - b. We await the Applicant's detailed answers to these questions so that the ExA may be in a position to take them in to accounts in its deliberations.