



# Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects

The Applicant's comments on Corpusty and  
Saxthorpe Parish Council's Deadline 4 Submission

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Deadline 5  
June 2023  
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<b>Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Examination submission</b>	
<b>The Applicant's comments on Corpusty and Saxthorpe Parish Council Deadline 4 Submission</b>	
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<b>Royal HaskoningDHV</b>	
Approved by:	Date:
<b>Dan Richards, Equinor</b>	June 2023

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## **1 The Applicant's comments on Corpusty and Saxthorpe Parish Council Deadline 4 Submission**

1. This document presents the Applicant's response to Corpusty and Saxthorpe Parish Council Deadline 4 submission [REP4-057].

*Table 1 The Applicant's response to Corpusty and Saxthorpe Parish Council comments*

ID	Stakeholder Comment	Applicant Response
1	The ExA will recall that in our original comments submitted at some length, we explained in some detail why both 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. By way of clarification, we note again that these two terms are not identical.	No response required from the Applicant.
2	Methodology describes the theory of method, in particular it refers to the framing of a problem. Method refers to the way that a problem is investigated once it has been framed. This subtle but important distinction is relevant throughout our comments here. It particularly engages questions of expertise and the relevance of expertise as discussed in sections 4 and 5 below.	No response required from the Applicant.
3	The ExA will also recall that the Applicant in their response indicated 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).”.	No response required from the Applicant.
<b>In the light of these comments, we confirm that:</b>		
4	The Applicant has not responded to the extensive critique which we submitted. Instead, they have chosen to avoid responding by quoting/citing their previous evidence, evidence which we have already demonstrated shows they have adopted both an inappropriate method and an inappropriate methodology.	<p>The Applicant does not accept the Corpusty and Saxthorpe Parish Council contention that there has been any avoidance in responding to the comments. The Applicant responded to the comments made by Corpusty and Saxthorpe Parish Council in <b>The Applicant's Comments on Post-Hearing Submissions</b> [REP4-040]. As noted in REP4-040, the Applicant's response to Corpusty and Saxthorpe Parish Council has been timely and extensive.</p> <p>Corpusty and Saxthorpe Parish Council has not demonstrated that the Applicant's method and methodology is inadequate.</p> <p>Corpusty and Saxthorpe Parish Council has demonstrated there are alternative methods by which to investigate the effects of a policy</p>

ID	Stakeholder Comment	Applicant Response
		<p>intervention on human health and wellbeing. It is not proven that this alternative method has been applied to the assessment of environmental impacts from any other offshore windfarms nor that it has been applied in the development consent process, in England, of any specific infrastructure project. The Applicant has never disputed the existence of alternative methods but has pointed to the guidance that has been followed and the process of engaging with stakeholders by which agreement on methods was sought and obtained.</p> <p>The observations offered by Corpusty and Saxthorpe Parish Council may be of theoretical interest, but the Parish Council does not state, nor does it venture to postulate, how its preferred approach would change the conclusions that have been reached in ES <a href="#">Chapter 28 Health</a> [APP-114].</p>
5	We invite the ExA to consider why the Applicant has omitted to engage with the substance of our evidence.	No response required from the Applicant.
6	In particular the Applicants have not responded to the critical question of why their assessment of the proposed project has not complied with the method for such studies required by the UK Government's Green Book <sup>1</sup> .	The Applicant responded to the comments made by Corpusty and Saxthorpe Parish Council in <a href="#">The Applicant's Comments on Post-Hearing Submissions</a> [REP4-040].
7	<p>We take the liberty of reminding the ExA once again of the purposes of the UK Government's Green Book as indicated in the introduction to this document, namely:</p> <p><i>"The Green Book is guidance issued by HM Treasury on how to appraise policies, programmes and projects. It also provides guidance on the design and use of monitoring and evaluation before, during and after implementation. Appraisal of alternative policy options is an inseparable part of detailed policy development and design. This guidance concerns the provision of objective advice by public servants to decision makers, which in central government means advice to ministers. In arms-length public organisations the decision makers may be appointed board members, and where local authorities are using the method, ... elected council members. The guidance is for all public servants concerned with proposals for the use of public resources, not just for analysts. The key specialisms involved in public policy creation and delivery, from policy at a strategic level to analysis, commercial strategy, procurement, finance, and implementation</i></p>	<p>No response required from the Applicant to the Respondent. The Applicant refers the ExA to its response to WQ3.6.4.1 in <a href="#">The Applicant's Responses to the Examining Authority's Third Written Questions</a> [document reference 19.2].</p>

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	<p><i>must work together from the outset to deliver best public value. The Treasury's five case model is the means of developing proposals in a holistic way that optimises the social / public value produced by the use of public resources. Similarly, there is a requirement for all organisations across government to work together, to ensure delivery of joined up public services.</i></p> <p><i>The Green Book is not a mechanical or deterministic decision-making device. It provides approved thinking models and methods to support the provision of advice to clarify the social – or public – welfare costs, benefits, and trade-offs of alternative implementation options for the delivery of policy objectives.”</i></p> <p>We remind the ExA that the Applicant's proposal is not only a project but also a component of a programme of projects forming part of a national policy. Given the criteria listed in the introduction to the Green Book, we consider that this method and methodology should apply across the board. The Applicant apparently believes that this is not the case. They do not provide a cogent (or indeed any) account of how they have arrived at this conclusion.</p>	
8	<p>We invite the ExA to consider, as do we, that failure to follow the recommended method and methodology is a very serious omission.</p>	<p>No response required from the Applicant.</p>
9	<p>In saying this, we say that the Applicant's assertion that the treatment of wellbeing might not be Green Book compliant is very significant. We invite the ExA to consider whether it is acceptable for this application, which is a national-policy driven investment, not to tick all the Green Book boxes both in spirit and in compliance with the legal requirements? We further say that the Applicant has signally failed to recognise the importance of this aspect of compliance.</p>	<p>The Applicant responded to the comments made by Corpusty and Saxthorpe Parish Council in <a href="#">The Applicant's Comments on Post-Hearing Submissions</a> [REP4-040].</p>

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10	In addition to the above comments, which in part repeat points made previously in our evidence but to which the Applicant has failed to respond, we remind the ExA – and apologise for having to do so – that the Green Book requires appraisal of options not selected, for example an OTN or the options of onshore transmission.	The Applicant responded to the comments made by Corpusty and Saxthorpe Parish Council in <a href="#">The Applicant's Comments on Post-Hearing Submissions</a> [REP4-040].
11	Here, once again, we have evidence of serious methodological flaws in the Applicant's approach and must enquire whether and how in their health and wellbeing appraisal "were the relative community impacts of these and any other options considered and, if so, what did such appraisal(s) suggest?".	ES <a href="#">Chapter 28 Health</a> [APP-114, Table 28-5] sets out the site selection process which was undertaken.
12	We further wish to tell the ExA that while C&SPC cannot afford specialised professional planning / legal advice in relation to these matters. However, we have very fortunately had access, albeit informally, via the personal and professional networks of one of our members, to the expertise of very senior planning experts who have worked at the highest levels of national planning. The comments in Section 3(a-h) above are informed by this expertise.	No response required from the Applicant.
13	Subsequent to the preceding, we now turn to the question of what kind and level of expertise was available to NCC when it met with Equinor. Here we encounter both a mystery and also some clear evidence that that meeting – as recorded by the Applicant in their minutes – was as cursory as we have suspected and as we have already explained at some length to the ExA.	No response required from the Applicant.
14	<p>The mystery: Councillor Steffan Aquarone, an elected member of Norfolk County Council has told us as follows:</p> <ul style="list-style-type: none"> <li>i. That in response to his question to the NCC Cabinet Member for Environment and Waste he received the following: <ul style="list-style-type: none"> <li><i>As part of the County Council's statutory response to the submitted Development Consent Order (DCO) for (the Orsted project) in 2018, all the relevant services and teams within the County Council were consulted on the applicant's Environmental Statement, including Public Health. No health related matters were raised by the County Council at that time, and it was accepted that more detailed issues were the responsibility of other statutory</i></li> </ul> </li> </ul>	<p>The Applicant notes that the answer quoted by Councillor Aquarone refers to the Orsted Project. The Applicant notes that the same process has been followed for the application for this project. The Applicant has consulted all the relevant services and teams within the County Council and is in the process of agreeing a Statement of Common Ground with Norfolk County Council (Revision D) (document reference 12.17), the latest iteration of which will be submitted at Deadline 5. The Applicant notes that the County Council has the competence for public health.</p> <p>The Applicant consulted with the East of England Ambulance Service NHS Trust with regards to effects on ambulance services and ambulance response times.</p>



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	<p><i>bodies such as District Councils who have responsibility for environmental health.</i></p> <p>It is interesting that NCC considers that such county wide, indeed region wide, matters should be devolved to district councils which are even less able to deal with public health matters than is NCC. In the experience of C&amp;SPC, public health matters at district council level are usually referred to environmental health as there is no public health expertise at district level.</p> <p>With regard to the Applicant's submission, Councillor Aquarone tells us that Norfolk County Council's Health and Wellbeing Board<sup>2</sup> is the forum for system leaders across the wider local health and care system. Its members include District Councils, the Integrated Care Board, Healthwatch, and others.</p> <p>Councillor Aquarone states as follows with regard to the Wellbeing Board:</p> <p>"I can find no mention of the Equinor project in any minutes dating back to summer 2018."</p> <p>Thus, the mystery is whether this project was ever given proper consideration and appraisal regarding public health and wellbeing issues arising from its implementation. This point is explored at length in the following paragraphs.</p>	<p>A Statement of Common Ground has been agreed with the East of England Ambulance Service NHS Trust [REP3-116] and is being agreed with Norfolk County Council [REP4-021, document reference 12.7].</p> <p>The Applicant also consulted with Public Health England (UK Health Security Agency) which has the national competence for public health.</p> <p>The Health and Wellbeing Board for Norfolk was not consulted as the Project is not anticipated to have an effect upon health and social care services across Norfolk.</p> <p>For the avoidance of doubt, the Applicant consulted all of the public health related statutory consultees required under section 42 of the Planning Act 2008, as detailed in the <a href="#">Consultation Report</a> [APP-029].</p>
15	<p>Our own FOI request was dealt with promptly by NCC. We asked as follows:</p> <p>This (FOI) concerns 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 Equinor claim that they met with "NCC Public Health Team" on 6 April 2022 "to agree methodology and the approach to assessment" of the effects of their proposed project on the health and well-being of the population of Norfolk. They further claim that "NCC acknowledges this engagement and states that the methodology for the Health Impact Assessment is appropriate and based on best practice." I am seeking the minutes of this meeting, including who attended, details of the discussion,</p>	<p>No response required from the Applicant.</p>

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	any notes which were taken in the course of the meeting and the decisions arrived at.	
16	In response to our request, NCC copied to us the following minutes prepared by Royal Haskoning DHV (RHDHV) dated 6 April 2022. We did not receive, as we had requested, copies of "any notes which were take in the course of the meeting". Nor, apparently, did NCC keep its own minutes or notes of this meeting.	No response required from the Applicant.
17	The ExA will note that the sole engagement at that meeting on questions of wellbeing and public health appear to have been in the person of Professor Andy Jones from the University of East Anglia who acted as an advisor to NCC. The other person in attendance from NCC was Ms Jane Locke, who at that time was a Prevention Policy Manager. In the next section we examine the role of a Prevention Policy Manager as it engages the complex matters to be investigated if we are to properly understand the health and wellbeing implications of a project such as that under consideration here.	No response required from the Applicant.
18	As far as we are able to ascertain, a Prevention Policy Manager has responsibility for " <i>Public Mental Health, suicide prevention, health inequalities, vaccination inequalities, drugs and alcohol policy, community safety</i> ". Ms Locke apparently no longer works for NCC and it has not been possible to examine her qualifications and experience. However, one of the current incumbents of a post bearing the same title appears to be a highly qualified person with a PhD in history, extensive administrative experience, as well as experience in student support <sup>3</sup> . Another current incumbent of a post with the same title appears to be a graduate in English Literature with an MA degree in Public Administration <sup>4</sup> . While the latter person evidently speaks the Ethiopian/Eritrean language Tigrinya, neither this person nor the other bearer of the title Prevention Policy Manager appears to have a formal qualification in any public health related discipline.	No response required from the Applicant.
19	According to the meeting minutes as recorded by RHDHC, questions of public health and wellbeing impact were considered by Professor Andy Jones. Professor Jones is certainly prominent in his field <sup>5</sup> . He is a distinguished environmental scientist who has undergraduate and postgraduate qualification from the University of East Anglia's (UEA) highly	No response required from the Applicant.

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	<p>rated School of Environmental Science. He now works in the UEA's medical school. His expertise is summarised in what are presumably his own words as:</p> <p><i>Environments and Healthy Lifestyles, Healthy Lifestyles, Environmental Sciences, Public Health, Health Prevention Activities, Use of geographical information systems in the study of the environment and health, Development of asthma in childhood.</i></p> <p><i>Video: UEA study finds dog walking can keep owners healthy in later life</i></p> <p><i>Academic Background</i></p> <p><i>1992 School of Environmental Sciences, University of East Anglia: BSc (Hons) in Environmental Sciences (1st class).</i></p> <p><i>1996 School of Environmental Sciences, University of East Anglia: PhD entitled Health Service Accessibility and Health Outcomes.</i></p> <p><i>Biography</i></p> <p><i>My primary research focus is on the environmental influences on population health. My core work explores the manner by which characteristics of the social and physical environments act to influence the health of the population. Previous work I have led in this field includes research on the environmental determinants of accidental injuries, and various projects examining the relationship between access to health services amongst rural populations and health outcomes.</i></p> <p><i>I moved to the Norwich Medical School in Autumn 2012, having previously been based in the School of Environmental Sciences at UEA.</i></p>	
20	<p>With all due and proper respect to Professor Jones, we invite the ExA to consider whether Professor Jones' areas of expertise meet the complex requirements for assessing the health and wellbeing impact of the proposed project. They do not engage with the complex issues concerning method and methodology we have raised here and in previous submissions. In particular, they deploy a formulaic methodology – the framing of the problem – which does not engage with health and wellbeing impacts. Professor Jones' experience in using geographic information systems is indicative of a</p>	No response required from the Applicant.

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	methodological approach which derives conclusions from high level secondary data rather than from collection and use of detailed primary data as would be indicated in the approach we have described in previous submissions to the ExA. Such approaches engage with the all-important detail of current and future implications of a large-scale project.	
21	Page 2 of the minutes report that “NCC Public Health representatives welcomed the methods as providing a consistent and transparent basis for explaining the public health implications of the project.” Once again, we say to the ExA that this is not so. The approach which was adopted was only consistent and transparent in not examining either the public health or the wellbeing implications of the project.	No response required from the Applicant.
22	We note here that the Director of Public Health, at that time Dr Louise Smith, was apparently not present at the meeting between NCC and RHDHC on 5 April 2022 or at any other meeting concerning health and wellbeing impacts of the project.	No response required from the Applicant.
23	We now draw to the attention of the ExA the content of Doc. No. C282-RH-Z-GA-00215 12.17 (Draft) which has only come to hand today, 23 May 2023. This is revealing because in table 13 page 47 of this document we find the following statement in row 2 column 1 wherein it is stated that “The potential impacts of the Projects on human health are assessed in Chapter 28 - Health [APP-114]. <b>The adverse impacts are considered not significant in EIA terms</b> (our emphasis). The cumulative impact assessment also concluded no significant impacts on human health.” This confirms our view that assessment methodology was inappropriate to and unconcerned with a proper examination of the impacts on human health and wellbeing. <b>As we have suggested on many occasions, an environmental impact assessment (EIA) is inappropriate, and further evidence that considerations of human health and wellbeing have not been properly examined.</b> This view is shared by us and evidently by the Applicants themselves, note their judgement “The adverse impacts are considered not significant in EIA terms” and that they have not dealt with these matters in terms of health and wellbeing. And we invite the ExA to consider NCC’s statement in row 2 column 2 of the table. This confirms that	<p>Corpusty and Saxthorpe Parish Council states that ‘an environmental impact assessment (EIA) is inappropriate’. As detailed in the <b>Planning Statement (Revision B)</b> [AS-031], SEP and DEP will each have a generating capacity which exceeds 100 MW and are therefore classified as Nationally Significant Infrastructure Projects (NSIP). The Applicant also refers the Respondent to the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017, which specifies when an NSIP requires an EIA. Schedule 2 (3)(i) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 states that EIA is required when the development involves installations for the harnessing of wind power for energy production (wind farms). As a Schedule 2 development, SEP and DEP meet the requirements for EIA.</p> <p>A determination of significance in EIA relies on informed, expert judgement about what is important, desirable or acceptable with regards to changes triggered by the project in question.</p> <p>Corpusty and Saxthorpe Parish Council quotes from the overarching conclusion, in the Statement of Common Ground with Norfolk County Council, that the adverse impacts are considered not significant in EIA</p>

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	<p>they have given no substantial consideration to these issues in their discussions with the Applicant.</p> <p><i>Table 13: Topics agreed, in discussion or not agreed in relation to human health</i></p> <table border="1" data-bbox="293 475 1059 868"> <thead> <tr> <th>ID</th> <th>The Applicant Position</th> <th>NCC Position</th> <th>Positi</th> </tr> </thead> <tbody> <tr> <td colspan="4"><b>EIA – Assessment Methodology and Impact Assessment</b></td> </tr> <tr> <td>1.</td> <td>The assessment methodology for the Health impact assessment, as set out in <b>Chapter 28 - Health</b> [APP-114], is appropriate and based on best practice.</td> <td>This was agreed at meeting between the Applicant and NCC Public Health on 6/4/22. It was restated at paragraph 10.1 in RR-064.</td> <td>Agree</td> </tr> <tr> <td>2.</td> <td>The potential impacts of the Projects on human health are assessed in <b>Chapter 28 - Health</b> [APP-114]. The adverse impacts are considered not significant in EIA terms. The cumulative impact assessment also concluded no significant impacts on human health.</td> <td>NCC Public Health agrees that there are unlikely to be any significant, long term adverse health impacts from the proposal compared to baseline conditions (paragraph 10.1, RR-064).</td> <td>Agree</td> </tr> <tr> <td colspan="4"><b>Points raised by Norfolk County Council Relevant Representation [RR-064]</b></td> </tr> <tr> <td>3.</td> <td>Norfolk County Council provided comments about public health in Relevant Representation [RR-064]. The Applicant provided responses in REP2-039, lines 68-70.</td> <td>NCC accepts these responses and has no further comment. If public concern about electromagnetic fields (EMF) arises the Applicant will address it through Project communication channels.</td> <td>Agree</td> </tr> <tr> <td>4.</td> <td>In PD-012, the Examining Authority puts two questions to NCC regarding mitigation and assessment scope (Q2.6.4.6 and Q2.6.4.7 respectively).</td> <td>The NCC Public Health team has responded to the Examining Authority. The NCC Public Health team confirms that it requests no additional mitigation and expresses a willingness to continue engaging with the Applicant as needed.</td> <td>Agree</td> </tr> </tbody> </table>	ID	The Applicant Position	NCC Position	Positi	<b>EIA – Assessment Methodology and Impact Assessment</b>				1.	The assessment methodology for the Health impact assessment, as set out in <b>Chapter 28 - Health</b> [APP-114], is appropriate and based on best practice.	This was agreed at meeting between the Applicant and NCC Public Health on 6/4/22. It was restated at paragraph 10.1 in RR-064.	Agree	2.	The potential impacts of the Projects on human health are assessed in <b>Chapter 28 - Health</b> [APP-114]. The adverse impacts are considered not significant in EIA terms. The cumulative impact assessment also concluded no significant impacts on human health.	NCC Public Health agrees that there are unlikely to be any significant, long term adverse health impacts from the proposal compared to baseline conditions (paragraph 10.1, RR-064).	Agree	<b>Points raised by Norfolk County Council Relevant Representation [RR-064]</b>				3.	Norfolk County Council provided comments about public health in Relevant Representation [RR-064]. The Applicant provided responses in REP2-039, lines 68-70.	NCC accepts these responses and has no further comment. If public concern about electromagnetic fields (EMF) arises the Applicant will address it through Project communication channels.	Agree	4.	In PD-012, the Examining Authority puts two questions to NCC regarding mitigation and assessment scope (Q2.6.4.6 and Q2.6.4.7 respectively).	The NCC Public Health team has responded to the Examining Authority. The NCC Public Health team confirms that it requests no additional mitigation and expresses a willingness to continue engaging with the Applicant as needed.	Agree	<p>terms. This statement indicates that, once the mitigation has been taken into account, the assessment finds there are no remaining significant effects from the perspective of health and wellbeing.</p>
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24	<p>At the very last minute of preparing this report, we have succeeded in seeing copies of the following documents:</p> <ul style="list-style-type: none"> <li>i. Sheringham Shoal and Dudgeon Offshore Wind Farm Extension Projects Revision C Deadline 4 May 2023 Document Reference: 12.17</li> <li>ii. Minutes of meeting, Subject Norfolk County Council Public Health and SEP and DEP: Re: Hearing 3 - Item 3 (iii) – Health, Date 26 April 2023, Time 1400-1500 attended by Jane Locke [JL] (NCC Public Health), Stephen Faulkner [SF] (NCC), Daniel Richards [DR] (Equinor), Ben Cave [BC] (Ben Cave Associates Ltd)</li> <li>iii. Minutes of meetings of NCC Planning and Highways Delegations Committee 22 October 2022.</li> </ul>	<p>No response required from the Applicant.</p>																												
25	<p>In none of this extensive documentation is there any evidence that consideration of health and wellbeing impacts of the proposed project has</p>	<p>No response required from the Applicant.</p>																												

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	moved in any way from its original inappropriate EIA approach to these matters. We refer in particular to the summative statement in the Minutes of the NCC Planning and Highways Delegations Committee of 22 October 2022, Section 5.	
26	Finally, we draw to the attention of the ExA and apologise for doing so once again, the failure of the Applicant to address the many questions we have posed in response to the request to us by the ExA chair, Ms Menaka Sahai, after the Public Examination in Norwich on 17 January 2023.	No response required from the Applicant.
27	<b>FINALLY, WE TAKE THE LIBERTY OF NOTING THAT NCC HAS REQUIRED THE APPLICANT TO PAY FOR THE ADDITIONAL WORK IMPOSED UPON THE COUNCIL IN DEALING WITH THESE MATTERS, HOWEVER INADEQUATELY. WE WOULD REMIND THE EXA THAT C&amp;SPC HAS RECEIVED NO SUCH SUPPORT IN PREPARING THE PRESENT AND ASSOCIATED DOCUMENTATION IT HAS SUBMITTED</b>	No response required from the Applicant.

## References

<sup>1</sup> <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government/the-green-book-2020>

<sup>2</sup> The Board plays a key role in promoting the close collaboration of the health and care systems across Norfolk. It does this by bringing together health and social care providers, local government, the voluntary,

European Commission. Environmental Impact Assessment of Projects: Guidance on the preparation of the Environmental Impact Assessment Report (Directive 2011/92/ EU as amended by 2014/52/EU). Luxembourg: European Union. 2017.

[REDACTED]

HM Government of Great Britain & Northern Ireland (2017). The Town and Country Planning (Environmental Impact Assessment) Regulations.

<http://www.legislation.gov.uk/uksi/2017/571/contents/made>