7000Acres Comments on Environmental Statement ES Addendum 21.1: Human Health and Wellbeing Effects

Prepared by: Lanpro Services January 2024 PINS reference: EN010133

Document reference: EX4/C8.4.21.1 APFP Regulation 5(2)(a)

Deadline 5

February 2024

Introduction

The 7000Acres campaign group represents over 1,000 local residents. We have a number of specialists on our group who provide input to our submissions. This includes an experienced health professional who is a retired General Practitioner, still works for the Lincolnshire Integrated Care Board and has over 30 years of experience of health in Lincolnshire.

Please take note of our comments already submitted at Deadline 1: https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/EN010133/EN010133-000952-7000%20Acres%20-%20Written%20Representations%20and%20summaries%20for%20any%20that%20exceed%201500%20words%2015.pdf

Health Concerns

In addition to our detailed concerns set out in our Deadline 1 submission, we have serious concerns over the process the Applicant has followed in assessing the health impact of this scheme, and the cumulative impacts of the multiple schemes in the area.

As detailed in our Written Submission, there has been no attempt to engage with Lincolnshire Public Health and NHS Lincolnshire to understand the possible Health and Wellbeing impacts this scheme will have on the surrounding areas and Gainsborough, its nearest town. There might be health issues in the construction and decommissioning phase as identified by the Applicant, however the Applicant fails to recognise the significant impact it will have to the communities over the sixty-year period of operation.

The Applicant has not considered health and wellbeing in a serious and professional manner; their Human Health and Wellbeing Addendum is merely a precis of their shallow and deficient assessments shown in the current ES. Neither has it provided a competent response to the issues we have raised in our submissions. Unlike some other topics, they have not employed a specialist to assess the impact on health, merely using a general planner within the Lanpro consultancy. This has resulted in a lay person's assessment that does not address the real impact on health and wellbeing caused by the individual and cumulative impacts of the numerous solar NSIPs in the region.

The NPPF and NPS require health to be assessed in a serious manner.

- NPPF Section 8 Promoting healthy and safe communities.
- NPPF Section 11 making effective use of land. In particular paragraph 123: "Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land"

• EN-1 Paragraph 4.3.1:

"Energy infrastructure has the potential to impact on the health and well-being ("health") of the population. Access to energy is clearly beneficial to society and to our health as a whole. However, the construction of energy infrastructure and the production, distribution and use of energy may have negative impacts on some people's health."

• EN-1 4.3.4:

"As described in the relevant sections of this NPS and in the technology specific NPSs, where the proposed project has an effect on humans, the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate."

• EN-1 4.3.5:

"The impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate." EN-1 4.3.6:

"Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing, this includes potential impacts on vulnerable groups within society, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole."

May we remind the Applicant that the World Health Organisation (WHO) describes the definition of health in their constitution as "a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmary." Therefore, a loss of amenity, increased noise and other issues will impact human health.

Summary

The Applicant has not assessed health and wellbeing in a serious manner.

We request that the ExA disregard the Applicant's Environmental Statement ES Addendum 21.1: Human Health and Wellbeing Effects, as it has been prepared by a lay person.

7000Acres believes the Applicant must employ a healthcare specialist to conduct a professional assessment of the health and wellbeing impacts caused by this and the other solar NSIP schemes in the locality. In particular, this work must follow the recommendation of 7000Acres and include a Health Impact Assessment.