

Deadline 7 Submission – Health and Wellbeing Impacts

Submitted on behalf of Ardleigh and Little Bromley Parish Councils

Norwich to Tilbury Project Environmental Statement EN0200027-003814

This submission addresses Environmental Statement Chapter 10 as it affects Ardleigh, Little Bromley and the East Anglia Connection Node (EACN). The Parish Councils understand the relevant document reference to be Environmental Statement Chapter 10, Health and Wellbeing (EN0200027-003814), but ask that the Applicant confirms the correct and consistent reference because it appears inconsistently formatted in the examination material. Although the ward is within the Local Study Area, the assessment is drawn at too broad a geographical scale. Ward-wide averages risk masking local effects on named receptors, roads and settlements, including homes close to the EACN, Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane, local public rights of way and the settlements of Ardleigh and Little Bromley.

Key Local Health and Wellbeing Concerns

Construction traffic and rural road safety are significant local concerns. Primary Access Route 30 on Bentley Road is identified as having potential for a large negative construction traffic noise impact, with a significant effect at a residential receptor before mitigation. The causal sequence requiring examination is clear: construction traffic and associated noise on narrow rural roads would expose residents, walkers, cyclists, horse riders and other road users to changes in safety, noise and accessibility; those changes may affect health determinants such as perceived safety, sleep, stress, access to services, physical activity and social contact; and those determinants may in turn affect wellbeing and, where evidence supports it, health outcomes. Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane and nearby lanes should therefore be assessed by reference to the receptors and users actually exposed, not only by reference to population-level conclusions.

Noise, vibration and operational effects require receptor-level assessment. The stronger factual foundation for this issue is the evidence on Bentley Road and operational noise, rather than a general assertion that all amenity effects are clinical health effects. Construction noise, construction traffic noise, vibration and long-term EACN operational noise may affect residential amenity, sleep, stress and wider wellbeing where receptors are sufficiently exposed. The Parish Councils therefore ask for receptor-specific assessment, clear operational noise limits, transparent monitoring and enforceable controls for affected homes and sensitive routes.

Mental wellbeing, visual amenity and sense of place are not assessed locally enough. The EACN, overhead lines, pylons, compounds, haul roads, lighting and vegetation loss would alter the rural character of the area. These effects should be

characterised carefully: some may be health determinants, but others are properly described as effects on wellbeing, residential amenity, community confidence and sense of place. The Applicant's own terminology should be used where it has identified properties or locations approaching the threshold at which living conditions would become unattractive, with the precise wording and reference supplied in the final version.

Vulnerable residents and access to services should be considered at receptor and settlement level. The Parish Councils do not need to assume that particular vulnerable individuals will be present without evidence. The point is that children, older people, disabled people, people with health conditions, people without access to a car, low-income households, pedestrians and cyclists may be more sensitive to disruption where rural communities rely on a small number of roads, services and informal support networks. If the Applicant disputes the presence or sensitivity of such receptors, that is a reason for a receptor-sensitive addendum, not for relying on ward-level averages.

Public rights of way and rural amenity support physical activity, social contact and mental wellbeing. Closures, diversions, construction traffic or perceived loss of safety may discourage walking, cycling and horse riding. The likely pathway is therefore from works and traffic disruption, to exposed recreational users and residents, to reduced perceived safety or accessibility, to potential changes in physical activity, social contact and wellbeing. The assessment should test these effects by reference to the rights of way and settlements actually affected.

EMF information, reassurance and community confidence also require attention. The Parish Councils do not allege exceedance of ICNIRP limits unless the evidence supports that case. The present concern is whether affected communities have been given adequate information, modelling, reassurance and transparent monitoring arrangements. Even where exposure is predicted to remain below relevant limits, uncertainty or inadequate explanation may affect community confidence and wellbeing.

Main Gaps Requiring Examination

The principal weakness is reliance on a ward-level approach. Ardleigh and Little Bromley are treated as one broad receptor, with insufficient settlement-level and receptor-level analysis of vulnerable groups, traffic safety, public rights of way, EACN operational noise, EMF information and cumulative effects. The cumulative issue should not be presented as a mere list of other projects. The point is that prolonged uncertainty, overlapping construction periods, repeated traffic disruption, repeated changes to rural amenity and the cumulative loss of community confidence may operate together on the same receptors and settlements.

Requested Actions for the Examining Authority

1. **Require a targeted health and wellbeing addendum** for Ardleigh and Little Bromley, addressing named receptors, roads, public rights of way and pathways from source to exposed receptor, health determinant, possible outcome and proposed control.
2. **Require receptor-level EACN operational noise assessment**, outcome-based operational noise limits and transparent monitoring for affected homes, drawing expressly on the evidence relating to Bentley Road and other named receptors.
3. **Require local traffic and safety controls** for Bentley Road, Ardleigh Road, Little Bromley Road, Hungerdown Lane, rural lanes and vulnerable road users, with controls tied to the specialist transport, noise and public rights of way evidence.
4. **Require enforceable, outcome-based mitigation and monitoring** for noise, vibration, construction traffic, access disruption, EMF information and cumulative impacts with other NSIPs, avoiding a separate generic “health mitigation” requirement where the necessary controls can be secured through the specialist topics.

Conclusion

Chapter 10 identifies relevant health determinants but does not assess them locally enough for Ardleigh, Little Bromley or communities affected by the EACN. The Parish Councils ask the Examining Authority to require a targeted addendum addressing named receptors and pathways, together with outcome-based controls and monitoring drawn from the specialist topics, before health and wellbeing impacts are accepted as adequately assessed and controlled.