

## 1. Introduction

This representation sets out significant concerns regarding the health and wellbeing impacts of the Steeples Renewable Project and identifies failures in both:

1. the Applicant's Health Impact Assessment (HIA) (EN010163/APP/7.2), and
2. the consultation process, which does not meet the required legal standards as defined by the Gunning Principles.

The evidence demonstrates that the proposal presents substantial risks to physical and mental health, community wellbeing, and health equality, many of which have not been adequately assessed, communicated, or mitigated.

## 2. Legal Framework

### 2.1 The Gunning Principles – Requirements for a Lawful Consultation

The consultation process must comply with the four Gunning Principles, established in *R v Brent ex parte Gunning* (1985) and endorsed by later case law including *Moseley* (2014):

1. Formative Stage – the proposal must not be predetermined.
2. Sufficient Information – consultees must receive clear, accessible information.
3. Adequate Time – consultees must be given sufficient time to respond.
4. Conscientious Consideration – responses must be genuinely considered.

These principles apply directly to nationally significant infrastructure projects, where affected communities must be able to fully understand risks and provide informed comment.

### 2.2 Health Impact Assessment and EIA Principles

Under standard HIA and EIA practice, an assessment must:

- identify all relevant health determinants (mental, social, physical, environmental),
- assess direct and indirect health pathways,
- consider cumulative impacts,
- evaluate effects on vulnerable groups, and
- present findings in a way that is transparent and accessible to affected populations.

The Applicant's HIA (EN010163/APP/7.2) does not meet these requirements.

### 3. Summary of Key Concerns

#### 3.1 Under-assessment of Mental Health and Community Wellbeing Impacts

Significant stress, anxiety, and feelings of powerlessness are already being experienced by residents due to the scale of the proposal and repeated industrial consultations in the area.

#### 3.2 Loss of Countryside and Access to Nature

The proposal removes accessible natural landscapes essential to physical activity and mental wellbeing.

#### 3.3 Impact on Farmers and Rural Livelihoods

Farming communities, already at higher risk of mental-health harm, face job insecurity and potential displacement.

#### 3.4 Physical Health Risks Acknowledged – But Not Sufficiently Assessed

The Applicant's own HIA identifies risks such as water contamination, fire hazards, and flooding, yet provides insufficient explanation of likelihood, mitigation, or residual risk.

#### 3.5 Consultation Does Not Meet the Gunning Principles

Key health risks were not clearly communicated, limiting the community's ability to respond with "intelligent consideration."

### 4. Detailed Evidence and Analysis

#### 4.1 Mental Health, Stress, and Anxiety (Direct and Indirect Impacts)

The local population reports substantial anxiety, stress, and fear for the future caused by:

- the scale of the development,
- the industrialisation of the rural environment, and
- repeated consultation cycles for multiple overlapping projects.

These impacts have not been sufficiently assessed in the HIA.

Cross-reference to Applicant's HIA:

The HIA states the proposal will “lessen health inequality,” yet it simultaneously acknowledges potential health risks. It does not include an adequate evaluation of mental health pathways, stressful cumulative impacts, or the lived experience of residents already reporting harm.

Legal relevance (Gunning Principle 2):

These mental-health impacts were not clearly explained in the consultation materials. As a result, consultees could not form an informed view, undermining the lawfulness of the process.

#### 4.2 Loss of Countryside, Nature, and Physical Wellbeing

Residents emphasise that walking, cycling, and spending time in nature form essential parts of their healthy lifestyle, physical activity, and family life.

The proposal would enclose villages with industrial development, removing:

- valued landscapes,
- accessible walking routes,
- wildlife-rich environments, and
- restorative natural views.

HIA Deficiency:

The Applicant fails to quantify or meaningfully assess these wellbeing losses. These are significant determinants of health and must be assessed under HIA and EIA principles.

Gunning concern (Principle 2):

The public were not given clear, accessible information explaining how the project would transform the landscape or the health implications of that change.

#### 4.3 Socio-economic Health Impacts on Farmers

Residents raised that local farmers face job insecurity and potential displacement. This is particularly concerning because:

- farmers are an at-risk mental health group,
- financial and occupational instability increases suicide risk, and
- loss of farmland affects community identity and rural wellbeing.

HIA Deficiency:

The Applicant's HIA does not address these vulnerabilities or provide meaningful analysis of impacts on rural livelihoods.

#### 4.4 Physical Health Risks Identified by the Applicant

The Applicant's HIA acknowledges risks including:

- water contamination,
- fire risk,
- flooding.

Yet it fails to provide sufficient evidence, modelling, assessment of probability, or accessible explanation for residents.

Gunning Principle 2 failure:

If risks are acknowledged but not clearly communicated or assessed, consultees cannot evaluate their significance, making the consultation legally deficient.

### 5. Failures of the Consultation (Gunning Principles)

#### 5.1 Principle 1 – Formative Stage

Residents report a sense of predetermination and “being bombarded with industrial projects,” suggesting uncertainty about whether the consultation was genuinely open.

#### 5.2 Principle 2 – Sufficient Information

The consultation materials did not give accessible, comprehensible information about:

- mental health impacts,
- cumulative effects of multiple projects,
- risks identified within the HIA.

Therefore, “intelligent consideration” was not possible.

#### 5.3 Principle 3 – Adequate Time

Overlapping consultations created consultation fatigue, reducing capacity to meaningfully participate.

#### 5.4 Principle 4 – Conscientious Consideration

Given the Applicant's HIA minimises or omits key community-reported harms, there is doubt that responses have been given meaningful consideration.

## 6. Conclusion

It is my view that the Steeples Renewable Project presents substantial and inadequately assessed threats to the health and wellbeing of the local population.

The Applicant's Health Impact Assessment is deficient in its treatment of mental health, cumulative pressures, socio-economic impacts, and acknowledged physical risks.

Furthermore, the consultation process does not satisfy the Gunning Principles, rendering it procedurally flawed.

For these reasons, the project—as currently presented—cannot be considered to have properly evaluated or mitigated its health impacts, nor to have engaged lawfully or meaningfully with the affected community.

I recommend that the applicant refer to Suffolk County Council's document named Energy and Climate Adaptive Infrastructure Policy Community Engagement and Wellbeing Supplementary Guidance Document for a framework on how to appropriately engage and include our community to reduce the negative impact to our health and wellbeing.

I kindly ask the examiners to consider identifying 'health and wellbeing' as a principle issue in its own right.