

D1 Written Representation – Site 7

Health, Wellbeing and the Disproportionate Impact on Neurodivergent and Vulnerable People

Summary

This representation focuses on the potential health, wellbeing and accessibility impacts of the East Pye Solar proposal, particularly on sub sites 7A, 7B, 7C, 7D and 7F and their proximity to Saxlingham Green, Saxlingham Nethergate, the surrounding rural road network and Saxlingham Nethergate Primary School.

While recognising the national need for renewable energy generation, I have significant concerns about the potentially disproportionate impact of the development on neurodivergent people, disabled residents, children, older people and those with additional physical or mental health needs.

These concerns are particularly relevant to households where individuals have autism, ADHD, sensory processing difficulties, learning disabilities, anxiety or other complex needs. Such individuals may rely heavily on familiar surroundings, predictable routines, quiet environments and reliable access to essential services to maintain their health and wellbeing.

The proposed construction traffic, abnormal indivisible load (AIL) movements, overnight vehicle movements, noise, vibration, lighting, road closures and disruption to public transport could cause significant and prolonged distress to those who are particularly sensitive to environmental change.

The central concern is that the impact on these residents cannot be adequately assessed by relying solely on average traffic movements, standard noise thresholds or assumptions about how the general population responds to disruption.

National Policy Statement EN-1, paragraph 4.4.6, specifically requires consideration of vulnerable groups and people with protected characteristics who may be differentially affected by development. The Applicant should therefore demonstrate how the particular needs of these groups have been identified, assessed and addressed.

Neurodivergence, sensory sensitivity and the need for routine

Neurodivergent people do not all experience the world in the same way. However, recognised characteristics of some neurodevelopmental conditions include heightened sensory sensitivities, difficulties processing unexpected changes, anxiety associated with uncertainty and a strong reliance on predictable routines.

NICE guidance on autism explicitly recognises the importance of predictability, clarity, structure and routine for autistic adults. It also recommends considering individual sensory sensitivities, including noise and lighting, and reducing environmental triggers where possible. Similar guidance for autistic children identifies noise, changes to routines and a lack of predictability as potential factors that may contribute to distress. These are recognised clinical considerations, not simply matters of personal preference.

For residents living close to Site/s 7, the construction phase could introduce a prolonged period of unpredictable and intrusive activity into an otherwise familiar rural environment. This may include:

- Unfamiliar heavy vehicles travelling along previously quiet rural roads.
- Sudden and unpredictable noise from construction, reversing alarms, machinery & AIL movements.
- Vibration and noise from piling and other intensive construction activities.
- Headlights, vehicle lighting and changes to the normal night-time environment.
- Unexpected road closures, diversions and delays.
- Changes to familiar walking routes, public transport and daily routines.

For some neurodivergent residents, the combined effect of these changes may lead to sensory overload, heightened anxiety, difficulties sleeping, distress and withdrawal from activities that they would otherwise undertake.

The impact may be particularly significant where individuals have limited ability to communicate their distress, manage unexpected situations or adapt quickly to changes in their surroundings.

I am particularly concerned that the Applicant's assessment may not adequately recognise the difference between temporary inconvenience for the general population and potentially substantial disruption to the health, independence and everyday functioning of neurodivergent individuals.

Mental health, wellbeing and vulnerable households

My household includes individuals with complex additional needs who are particularly sensitive to noise, disruption and environmental change. The effects of Site/s 7 are therefore a direct and personal concern.

I am concerned that the combination of construction activity, traffic movements and changes to the familiar environment could create a sustained level of uncertainty and anxiety. The effects may extend beyond the immediate disturbance itself, affecting sleep, concentration, emotional regulation, family relationships and the ability to

maintain established routines.

These concerns are supported by NICE guidance, which identifies environmental factors, sensory sensitivities and changes to routines as relevant considerations when assessing the needs of autistic children and adults. The guidance also recognises that environmental triggers can contribute to distress and that appropriate adjustments can help minimise their effects.

The impacts should also be considered in relation to other vulnerable residents, including:

- People with learning disabilities who may find unexpected changes difficult to understand or communicate.
- People with anxiety or other mental health difficulties who may experience increased distress due to uncertainty and loss of control.
- Older people who may have reduced mobility, sensory impairments or greater reliance on local services.
- People with chronic health conditions who depend on reliable access to medical appointments and support.
- Children who may be particularly sensitive to disruption to their home, school and familiar environment.
- Unpaid carers and family members who may experience additional pressure when supporting individuals affected by disruption.

It is important not to assume that all people within these groups will experience the same effects. However, their potential needs should be explicitly considered, rather than relying on an assessment based on the experience of the wider population.

EN-1 paragraphs 4.4.2–4.4.6 identify increased traffic and noise as potential direct health impacts, recognise indirect impacts from disruption to transport and access to services, and require cumulative health effects and the differential impacts on vulnerable groups to be considered.

I therefore ask the Examining Authority to give specific consideration to the potential for sustained distress and reduced wellbeing among residents who may have limited capacity to adapt to prolonged and unpredictable disruption.

Construction noise, vibration and sensory overload

Noise is a particular concern for neurodivergent residents and people with sensory processing difficulties.

NICE guidance recommends that noise levels and individual sensory sensitivities be considered when supporting autistic people. It recognises that reducing external sounds and adapting the physical environment may be necessary to minimise negative impacts.

The existing rural environment around Site/s 7 is familiar to residents and provides a baseline against which construction noise and vibration will be experienced. The introduction of heavy construction vehicles, piling, machinery, generators, reversing alarms and other activities could represent a substantial change to this environment. For people with heightened auditory sensitivity, noise that may be considered acceptable under standard assessment criteria can nevertheless cause significant discomfort or distress. This does not mean that recognised noise limits are irrelevant, but that compliance with a numerical threshold alone may not fully describe the effect on particularly sensitive residents.

Repeated or unpredictable noise may also interfere with sleep, concentration, emotional regulation and the ability to feel comfortable within one's own home.

Over an extended construction period, these effects may accumulate, particularly where residents have little opportunity to avoid the disturbance or find alternative quiet environments.

I therefore request that the Applicant's noise assessment and proposed mitigation be examined with particular regard to:

- The duration, frequency and timing of construction noise.
- Piling and other high-impact activities.
- Noise from construction traffic and AIL movements.
- Night-time and early-morning disturbance.
- Vibration and associated effects on residential amenity.
- The proximity of noise sources to sensitive residential properties.
- The cumulative effects of simultaneous construction activities.

Any consent should include clear and enforceable noise and vibration limits, defined working hours, monitoring arrangements and a mechanism for prompt corrective action where unacceptable disturbance occurs.

Overnight AIL movements and disruption to sleep

The proposed overnight movement of abnormal indivisible loads is a particular concern for residents with sensory sensitivities, sleep difficulties and additional support needs.

Large vehicles travelling close to residential properties may generate noise from engines, braking, acceleration and manoeuvring, as well as light intrusion from headlights and associated escort vehicles.

For neurodivergent individuals who experience disrupted sleep or heightened sensitivity to environmental stimuli, unexpected overnight disturbance may have a

particularly significant effect on their wellbeing and ability to manage daily activities. Sleep disruption can affect concentration, mood, emotional regulation and daily functioning. Where an individual already has difficulties with sleep or managing sensory input, repeated disturbance may compound existing challenges. It is therefore important that overnight movements are not considered solely in terms of highway efficiency and traffic management.

I request that the Applicant demonstrate why overnight AIL movements are necessary and whether they can reasonably be undertaken during daytime hours. Where overnight movements are unavoidable, their number, timing, routes and proximity to residential properties should be subject to strict controls, with advance notification to affected residents.

Public transport, independence and access to essential services

The rural road network around Site/s 7 includes narrow and single-track roads that serve residents, public transport, school transport, pedestrians, cyclists, agricultural vehicles and emergency services.

Construction traffic and AIL movements could result in congestion, delays, temporary road closures and diversions, potentially affecting the reliability and accessibility of local transport.

For neurodivergent and vulnerable residents, reliable transport may be essential to maintaining independence, accessing employment, attending medical appointments, participating in education and sustaining social relationships.

Unexpected changes to familiar journeys, delays, cancelled services and unfamiliar diversions can present additional barriers for some autistic people and those with learning disabilities, anxiety or mobility difficulties.

In a rural area with limited alternative transport, disruption to bus services or school transport could have significant consequences. Residents who cannot drive or who depend on carers, family members or accessible transport may have fewer options for adapting to these changes.

For some individuals, the inability to predict when a journey will be completed or whether a familiar route will remain accessible may result in increased anxiety or avoidance of travel.

This could reduce access to essential services and increase the risk of isolation, particularly among older people and those with disabilities.

EN-1 paragraph 4.4.3 explicitly recognises that impacts on access to transport and key public services can have indirect health consequences.

I therefore request that the Applicant demonstrate how reliable access to public transport, school transport, healthcare and other essential services will be maintained throughout construction, including when AIL movements, temporary road closures or traffic management measures are in operation.

Public Rights of Way, familiar environments and social isolation

Public Rights of Way around Site/s 7 provide opportunities for walking, recreation, exercise and social interaction. For some vulnerable residents, familiar local routes are also an important part of maintaining routine, managing anxiety and accessing the countryside.

The temporary closure, diversion or increased disturbance of these routes could disproportionately affect residents who depend on familiar walking environments or who have limited confidence in unfamiliar surroundings. Where people rely on regular walks for physical activity, emotional regulation or social contact, losing access to familiar routes may have consequences beyond the temporary loss of recreational amenity.

The potential for construction traffic to make local roads feel less safe may also discourage vulnerable residents from walking or accessing the countryside.

I therefore request that Public Rights of Way remain open wherever practicable and safe during construction, with accessible and clearly communicated alternatives provided where closures are unavoidable. Any diversion should consider the needs of people with mobility impairments, sensory sensitivities and difficulties navigating unfamiliar routes.

Equality and assessment of differential impacts

The Equality Act 2010 provides protection against disability discrimination. Autism, ADHD and other neurodevelopmental conditions may fall within the definition of disability where their effects meet the statutory criteria. The Public Sector Equality Duty requires relevant public authorities to have due regard to eliminating discrimination, advancing equality of opportunity and fostering good relations. Government guidance on the Public Sector Equality Duty recognises the importance of understanding different needs and taking steps to address disadvantages experienced by disabled people.

EN-1 paragraph 4.4.6 also explicitly requires consideration of vulnerable groups and people with protected characteristics who may be differentially affected by energy infrastructure.

I therefore ask the Examining Authority to consider whether the Applicant has adequately assessed the differential impacts of Site/s 7 on neurodivergent and vulnerable residents.

In particular, the assessment should establish whether the Applicant has considered:

- Sensory sensitivities to noise, vibration and lighting.
- The importance of familiar surroundings and predictable routines.
- The consequences of unexpected traffic disruption and transport changes.
- Potential impacts on sleep, mental wellbeing and emotional regulation.
- Barriers to accessing healthcare, education, employment and social activities.
- The needs of individuals who rely on family members, carers or support services.
- The cumulative and prolonged effects of multiple sources of disruption.

The absence of detailed evidence about individual residents' needs should not be treated as evidence that there will be no differential impact.

Cumulative impacts and enforceable mitigation

The potential effects of Site/s 7 should be considered collectively rather than as separate technical issues.

For vulnerable and neurodivergent residents, the combination of construction noise, overnight AIL movements, heavy traffic, lighting, road closures, disrupted public transport and changes to familiar surroundings may create a cumulative impact that is greater than the effect of any single activity.

I request that any development consent includes clear, enforceable and monitored mitigation measures, including:

1. Strict controls on the timing, frequency and routing of AIL movements, avoiding overnight movements wherever reasonably practicable.
2. Advance, accessible and clearly communicated notification of road closures, diversions, AIL movements and significant construction activities.
3. Protection of access to essential services, public transport and school transport.
4. Specific arrangements to protect schoolchildren and vulnerable road users around Saxlingham Nethergate Primary School.
5. Enforceable construction noise and vibration controls, including monitoring near sensitive residential properties.
6. Restrictions on construction hours and deliveries to minimise early-morning, evening and night-time disturbance.
7. Protection of pedestrian access and Public Rights of Way, with safe and accessible alternatives where required.
8. Effective traffic monitoring and agreed thresholds that trigger additional mitigation.
9. A clear complaints procedure, with prompt investigation, corrective action and reporting of repeated or significant disturbances.
10. Specific consideration of vulnerable residents in construction management and community liaison arrangements.

The Applicant should also explain how these measures will be implemented, monitored and enforced throughout the construction period, rather than relying solely on general commitments or future management plans.

Conclusion

I recognise the national importance of renewable energy generation. However, the need for renewable infrastructure does not remove the requirement to properly assess its potential impacts on the health, wellbeing and daily lives of affected communities.

For Site/s 7, particular consideration should be given to neurodivergent people, disabled residents, children, older people and other vulnerable individuals who may experience disproportionate effects from noise, sensory disturbance, unpredictable changes and disruption to essential transport. For my household, these concerns are especially significant because of the complex additional needs of family members who are highly sensitive to noise and environmental change.

The assessment of this development should not be based solely on what the average resident can reasonably tolerate, but should also consider those for whom noise, disruption, uncertainty and the loss of familiar routines can create substantial barriers to health, wellbeing and independence.

I respectfully ask the Examining Authority to give particular and rigorous consideration to the differential and cumulative impacts of Site 7 on neurodivergent and otherwise vulnerable residents, including the potential for prolonged construction activity, traffic, noise, disruption and loss of access to exacerbate existing vulnerabilities and adversely affect health, wellbeing and day-to-day functioning.

Where significant adverse effects have been identified, I respectfully submit that reliance on general or aspirational mitigation should not be sufficient. Any mitigation relied upon in determining the acceptability of the scheme should be clearly specified, proportionate to the identified impacts, enforceable through the DCO or associated requirements, capable of being implemented effectively, and subject to robust monitoring, reporting and review.

In particular, I ask the Examining Authority to satisfy itself that the evidence demonstrates that the proposed mitigation will be effective in practice, rather than merely assumed to be effective, and that there are clear mechanisms for intervention and remedial action if predicted impacts are exceeded. Where uncertainty remains regarding the severity or cumulative nature of these impacts, that uncertainty should be properly addressed before consent is granted.

I therefore respectfully ask that the identified impacts on vulnerable and neurodivergent residents, including their cumulative effects with traffic, construction activity, noise, disruption to public rights of way and access for emergency and health services, are fully considered in determining whether the proposed development would be acceptable and whether the proposed mitigation provides adequate protection before any Development Consent Order is made