

Memorandum

To: Helen Wass, Development Management Team leader

From: Cecilia Murphy-Roads, Senior Public Health Manager, Health in All Policies

C.C. Iain Green, Team Manager Health in all Policies

Date: 29th Nov 2023

RE: CCC/23/110/FUL

Application for planning permission: farm-based anaerobic digestion renewable energy facility, construction of vehicular access/road to A1307, associated infrastructure and landscaping Land at Streetly Hall Farm, Streetly End, West Wickham

Overview

We welcome the overall approach; the Introduction, Policy Context and Methodology are noted and agree that due to the nature of the site as an Anaerobic Digestion (AD) renewable energy facility the use of a Rapid HUDU assessment is appropriate. As well as the scoping out of elements that do not pertain to the site.

Rapid Health Impact Assessment

Air Quality, Noise and Neighbourhood Amenity

- The Noise Impact Assessment, Construction Environmental Management Plan and Odour Assessment show that the proposal minimises construction impacts including dust, noise, vibration and odours.
- These documents read alongside further planning documents clarify that the AD process is fully sealed and is not a source of emissions unless there is a fault.
- Predicted odour concentrations are below the benchmark level at all receptor sights – impacts slight at two receptors and negligible at six locations and therefore overall affect not significant.
- The Air Quality Assessment clearly states mitigation processes to minimise potentially negative outputs. All the clamps are covered, covered storage, careful emissions management and therefore resultant impacts were classified as not significant in accordance with the IAQM criteria.
- The Air Quality Assessment also highlights the importance of a construction phase plan as per CVEMP by contractor. Mitigation methods are supported by the use of best practices for dust management and the importance of contractor adherence.
- In the CEMP we welcome all mitigations identified in table 1 (noise), table 2 (dust) table 4 (oil and noxious substance) as well as section 27.3 where the concrete and cement washout is discussed in detail as this is essential to mitigating any noxious substances and to ensure human health.

- We welcome that the Statement of sustainable design and construction states in 5.31 that a Construction Phase plan will be prepared in accordance with mitigation techniques for noise and vibration.
- The Noise Impact Assessment predicts that during the construction phase the noise levels are below guidance levels for rural areas. And that no noise above criteria levels by day or night during the operational phase of the facility therefore no predicted adverse effects.
- We note a small increase in nighttime noise levels at two residential properties. We defer to Local EHO advise but agree that the levels are not significant.
- Minimal to no plant related traffic should go through Horseheath due to the creation of the direct link to the A1307 and should also reduce current farm machinery traffic as well, the accumulative effect is beneficial to wellbeing and health of local residents and maintaining or potentially improving neighbourhood amenity.
- As long as the applicant ensures the construction process follows the procedures set out in the Construction Traffic Management Plan it should mitigate any negative impacts and keep the construction and operational phases 'neutral' as indicated in the Rapid Assessment.

Accessibility and active travel

- Public Health welcomes cycle storage on site to enable more active travel uses and the provision of showers for personnel.
- As well as available on site parking ensuring ready access to the site

Crime reduction and community safety

- We welcome that the proposal incorporates fencing, CCTV and gated barriers to secure the facility appropriately.
- We support the active consultation with the local communities as shown in the Statement of Community Involvement section 4 in the Planning Statement.

Access to work and training

- We support that during the construction phase the proposal plans to use local contractors and suppliers where possible.
- Operational phase will benefit from local, permanent employment opportunities.
- The AD facility as a whole should help local farmers to diversify their businesses with long term stable income streams helping to future proof their farming business and the local rural economy.
- Maintaining economic wellbeing in rural areas is a part of the wider determinants of health for Cambridgeshire and Peterborough and for the farming community locally and nationally.

Minimising use of Resources

- We welcome in the CEMP table 5 Housekeeping and wastes, the identified mitigation re construction phase waste.

- The efficient land use as explained in the Planning Statement; minimising the use of the best agricultural land while also balancing location needs based on access, landscaping/ design, flood/ transport considerations, proximity to gas main etc thereby creating a suitable location with minimal impacts on the community and landscape.
- The purpose of an Anaerobic Digestion facility is to effectively use agricultural wastes and residues (from Streetly Farm and local partnerships) thereby generating renewable energy and organic soil improving digestate.

Climate change

- Climate change is a scoped in topic and therefore needs to be included in Table 1 in the opening section, see below

Scoped HIA Topic	Application Evidence
Air Quality, Noise and Neighbourhood Amenity	<ul style="list-style-type: none"> • Noise Impact Assessment • CEMP • Odour Assessment • Air Quality Assessment • Transport Statement
Accessibility and Active Travel	<ul style="list-style-type: none"> • Transport Statement
Crime Reduction and Community Safety	<ul style="list-style-type: none"> • Statement of Community Involvement (in Planning Statement)
Access to Work and Training	<ul style="list-style-type: none"> • Planning Statement
Minimising the Use of Resources	<ul style="list-style-type: none"> • CEMP • Statement of Sustainable Design and Construction • Planning Statement

- The AD plant will use agricultural and related waste, to generate renewable energy and the application of digestate will reduce the reliance on fossil fuel based fertilisers, improve soils and improved carbon sequestration in the land.
- Anaerobic Digestion can contribute to all three energy sectors (heat, power and transport) and the proposals highlight the positive energy production and carbon reduction.
- We support that the proposed landscaping will provide biodiversity net gain.
- We welcome the sustainable design and construction techniques proposed in the Statement of Sustainable Design and Construction including the Sustainable Drainage systems, the associated Flood risk assessment and Surface water Drainage strategy. Also that all captured water will be recycled at the plant.
- The proposal (in the Sustainable design and construction Statement) does not clarify if plant buildings are only responsive to summer and winter temperatures solely through landscaping design or if there are further considerations re building design i.e. ventilation and shading?

Mitigation Measures

- Mitigation measures are explained in detail across the CEMP, the Air Quality Assessment and further documentation however more details in the summary table in the Rapid HIA would have been useful rather than just referencing the other documents without a snapshot summary.
- We welcome the comprehensive scheme described in the planning statement in 5.38 for visual landscaping measures to maintain the rural landscape and minimise impact on the local vistas – though not discussed in a Rapid HUDU style assessment HIA – in the context of this rural site it is of benefit to nearby residents and local communities in terms of mental health and wellbeing.

Conclusion

We agree that the points identified as neutral regarding noise, odour and dust in the Rapid Assessment have no potentially significant effect on human health as long as mitigation and management is carried out as identified across the planning assessments and further documentation. However we defer to Local Environmental Health Officer opinion and to UKHSA for any impacts on Human Health. The overall scheme brings positive impacts to human health and wellbeing if the site is run in accordance with the EA permit. Such as meeting the wider determinants of health and the potential ensuing benefits to our communities including improving the climate change picture and energy security.