

Sue Penaluna
Development Management Officer
Devon County Council
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Dear Sue,

Request for a Health Impact Assessment (HIA)

On behalf of the Buckfastleigh Community Forum, as a key stakeholder group, I would like to formally request that Devon County Council seek a Health Impact Assessment (HIA) as part of the required supplementary information to be provided by the applicants MVV Environment for the proposed development of Whitecleave Quarry in Buckfastleigh.

We have been advised by an environmental consultant that an HIA should be expected for such a development.

Although we were not statutory consultees, we initially sought an HIA early in the environmental scoping process. We understand that unfortunately a response to the scoping from Teignbridge Environmental Health was not available in the timeframe allocated for consultation. The planning application has now been submitted and we have had a chance to peruse the Environmental Statement (ES). It is clear that despite this being a very comprehensive document in many ways, it has still failed to address many of our concerns.

We understand that under Regulation 19 of the Town and Country Planning Act, the planning authority have the right to request any further supplementary information. We believe this request is fully consistent with Planning Policy Statement 10.

The applicants themselves have highlighted certain aspects of PPS 10 in their application:

“PPS10 sets out government planning policy on waste management. The government’s stated overall objective is to protect human health and the environment ... PPS10 includes a number of key planning objectives, which are summarised below...”

- *Reflecting the concerns of stakeholders in waste management.*
- *Protection of green belts and recognition that the particular locational needs of some waste management facilities, together with the wider environmental and economic benefits of sustainable waste management, are material considerations that should be given significant weight in determining whether proposals should be given planning permission.”*

According to the Devon Waste Local Plan, PPS10 states that:

“it is confirmed that the planning system should ensure that the location of waste development is acceptable and that health can be a material consideration in such

decisions. In the event of health concerns being raised over proposals for waste management facilities, it is advised that the views of the relevant health authorities and agencies be sought.”

Section 3.4.2 of the Waste Local Plan states:

“When considering proposals for waste management facilities, public concerns over health impacts should be discussed with the relevant health authorities and agencies, and appropriate measures incorporated into the site design and planning permission to prevent any adverse effect on human health.”

The stated objective is this is:

“OBJECTIVE 3: PROTECTION OF HUMAN HEALTH AND THE ENVIRONMENT

To minimise any adverse effects on human health and the environment caused by the introduction of waste management facilities, and to enhance the local environment”.

On these grounds, we believe it is not only legally acceptable but a legal requirement that an HIA is requested.

According to the World Health Organisation:

“Health Impact Assessment (HIA) is a means of assessing the health impacts of policies, plans and projects in diverse economic sectors using quantitative, qualitative and participatory techniques. HIA helps decision-makers make choices about alternatives and improvements to prevent disease/injury and to actively promote health. WHO supports tools and initiatives in HIA to dynamically improve health and well-being across sectors.”

More details can of course be found on the WHO’s website. They describe the ability for HIAs to actually understand if a development is indeed capable of being described as “sustainable” or not. <http://www.who.int/hia/about/why/en/index.html>

This would be consistent with section 3.5.5 of the Waste Local Plan that states:

“When putting forward site-specific proposals for waste management facilities, developers will be required to demonstrate, inter alia, that their proposals are consistent with the sustainable waste management objectives of the Waste Local Plan”.

On reading the Environmental Statement (ES) produced by the applicant’s consultant, despite there being a large amount of scientific evidence (indeed the term “*blinded with science*” may be appropriate) there appears to be a distinct lack of practical, local knowledge. Additionally, we cannot see any evidence of participatory feedback being

utilised. The ES appears to be primarily the product of 'desktop' analysis with little regard to many important concerns of local stakeholders that have been expressed very vocally.

Specific points of concern I raised about traffic issues on Strode Road with Tamsin Wray (the URSScottWilson consultant responsible for producing the ES) have been completely ignored within the traffic statement. Mine is just one story.

Local stakeholders are extremely concerned about the impacts that the increased noise, fumes, dust, particulate matter and vibrations are likely to have on their health. This is especially true since Buckfastleigh is already regarded as a deprived area in terms of health and wellbeing by the council.

The local medical centre has an asthma speciality and there are considered to be significant respiratory problems amongst the town's population. If you look at the attached photograph of 6 months' worth of grime wiped from my window sill in the centre of town, you may understand why.



The Waste Local Plan Core Policy WPC2: Development Control Considerations states:

"Proposals for waste development will be assessed having regard to the following considerations:

1. Any adverse impact arising from the proposal on:

*(f) the **health and amenity** of nearby residents;*

(g) the likely generation of noise, vibration, odour, fumes, dust, litter, scavengers and vermin"

Details within Policy WPP22: HEALTH AND AIR QUALITY state that Waste Planning Authorities should:

"ensure that they are in possession of the relevant advice on any implications for health through consultation with the appropriate health authorities and other agencies and, when determining planning applications, the WPA will take into account any relevant advice."

The Environmental Statement has failed to address many of Buckfastleigh residents' concerns. For instance, we believe the implication that the existence of the A38 essentially

makes further noise issues irrelevant is highly disingenuous. The A38 is highly polluting in terms of both noise and air pollution. Any further development will merely exacerbate this problem. It should also be recognised that there are plans to incinerate 500,000 tonnes of waste in South Devon (as well as a 1,000,000 tonne landfill site, in addition to Anaerobic Digesters). Much of this waste will likely come down the A38 past Buckfastleigh as increased traffic flow. It is not just because the applicant's proposed Devonport development would be responsible for much of this additional traffic flow that this needs to be considered as part of the "cumulative effect" of development.

Although an HIA will be able to address such concerns in detail, to briefly outline two examples:

The increased use of residential roads as an artery to the plant could have a very detrimental impact on the health, wellbeing and amenity of residents who live in the town¹. Dangers are present that have failed to be acknowledged in the production of the ES. For instance, we are very unhappy with the implication that because there have been few road accidents on Strode Road then there is not a problem with increased HGV traffic.

The measurement of the average speed of traffic "to the south of the site access" (Detailed n paragraph 11.4.3 of the Traffic Assessment) is disingenuously measuring average speed in an acceleration/deceleration zone. We believe this is highly misrepresentative of the true average speed of traffic on this road (in as far as average speed or the 85th percentile of speed measured is actually relevant). Many people in town refuse to walk along that road literally for fear of their life. I know this for a fact because I am one of them.

A simmering issue in town is the lack of parking on Plymouth Road in spite of the numerous new residential properties built there in recent years. This forces residents to park on (and block) pavements. Pedestrian access is already compromised to the detriment of the community and the proposals would exacerbate this problem. This is not something the HPA or the District Environmental Health Officer could (or should) be aware of without local detailed local consultation. These issues are however a material concern of public wellbeing and amenity to local stakeholders - and hence material considerations of planning law. The applicant has signally failed to address them.

The recognised problem of dust being deposited on the town from the works seems to be addressed in a very cursory manner in the ES. Appendix 12.1 (Environmental Risk Assessment: Potential Effects of Dust on Sensitive Receptor Locations), suggests that workings at the site will merely result in "Nuisance dust depositing on surfaces such as cars and clothing". Given the potentially toxic nature of both the rock proposed to be worked and the IBA (both of which contain elements and compounds dangerous to human health), this is a highly disagreeable attitude.

The WHO suggest: "HIA provides a way to engage with members of the public affected by a particular proposal. An HIA can send a signal that an organization or partnership wants to involve a community and is willing to respond constructively to their concerns."

¹ Please note that this was acknowledged in the 2002 ROMP conditions for the site as the level of traffic was specifically constrained in the interest of protecting the amenity of local residents.

If MVV are genuinely concerned with public consultation they should welcome Devon County Council's request for an HIA. It is clear to people in the community that an HIA would go far beyond the 'box-ticking' exercise of "*community involvement*" that is perceived to have been undertaken so far. These are not points of planning objection we are raising, but points of legitimate concern that need to be addressed.

The exercise would not even have to involve an expensive multi-month study. It could be carried out with a little bit of co-ordination from the local health authority, the district council, Dartmoor National Park Authority (as our local planning authority), and the applicants themselves. It could involve a few full days in the town hall open to all members of the town to come and express specific concerns they have, with specific reference to the now publicly available documentation and studies (which were not previously available during "*public consultation*"). All the information could be documented by an impartial third party and summarised in a report made available to the public and the Waste Planning Authority (WPA).

This would respect the objectives of the Waste Local Plan in as much as it would enable the WPA to ensure that "*they are in possession of the relevant advice on any implications for health*". Members of the Community Forum would of course welcome the opportunity to volunteer our help in co-ordinating such a study.

We do not think there can be any downside with regards to seeing the fairest development management outcome for all concerned parties, and something that could encourage 'buy-in' for any waste proposals at the site. Indeed the panoply of information gathered from such detailed research would enable a much better independent identification of mitigation measures should this, or any revised application, have permission granted.

We trust this represents a sufficient requirement to enable you to make the request. As previously discussed, we understand that Buckfastleigh Town Council are also very keen to see an HIA undertaken and indeed may be contacting you directly. As we understand it, it is generally not in the remit of local Environmental Health or the Health Protection Agency to take a specific position on these issues and instigate requests such as these.

We think the Planning Authority recognise the community's concerns. We hope you feel sufficiently empowered by the clear guidelines to be confident in requesting an HIA. The specifics of how this should be carried out can no doubt be discussed in more detail in consultation with the community.

Yours sincerely,

Neil

Neil Smith,

Chairman, Buckfastleigh Community Forum