

Green Hill Solar Farm

EN010170

Environmental Statement

Appendix 18.1: Human Health Legislation, Policy, and Guidance

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APFP Regulation 5(2)(a)



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Issue Sheet

Report Prepared for: Green Hill Solar Farm
DCO Submission

Environmental Statement Appendix 18.1: Human Health Legislation, Policy, and Guidance

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1 Introduction

- 1.1.1 This appendix to ES Chapter 18: Human Health **[EN010170/APP/GH6.2.18]**, sets out the legislation, policy, and relevant guidance to support the assessment of likely significant effects on human health and as a result of the Scheme.
- 1.1.2 The purpose of this appendix is to identify the relevant legislation and policy only, and does not assess the Scheme against those policies. This appendix also identifies specific policy requirements or guidance that are likely to influence, or set requirements for the scope and methodology of the assessment of human health effects.



2 Legislation

2.1 UK Legislation

Infrastructure Planning (Environmental Impact Assessment) Regulations 2017

- 2.1.1 The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) (Ref.1) sets out the regulatory framework for Environmental Impact Assessments in connection with development consent order applications, including screening, scoping and the requirements in respect of their content. Therein, Regulation 5(2) require the direct and indirect significant effects of the Scheme on population and human health factors to be identified, described, and assessed.

Planning Act 2008

- 2.1.2 The Planning Act 2008 (Ref.2) sets out the process for the consenting of Nationally Significant Infrastructure Projects (NSIPs) and is the principal legislation governing an application for an order for development consent for NSIPs.

Equality Act 2010

- 2.1.3 The Equality Act 2010 (Ref.3) consolidated previous legislation designed to prohibit discrimination on the grounds of protected characteristics, and is thus a specific consideration for the determination of health impact on vulnerable population groups and to ensure that groups with protected characteristics are not disproportionately affected by the Scheme.

Health and Care Act 2022

- 2.1.4 The Health and Care Act 2022 (Ref.4) sets out health reforms in England and formalises the establishment of Integrated Care Systems across England, to be operated by Integrated Care Boards (ICBs). There are 42 ICBs across England, of which Northamptonshire ICB, and Bedford, Luton and Milton Keynes ICB cover the authority areas within which the Scheme lies. The establishment of Integrated Care Systems is based on four strategic objectives (Ref.5):

- Improving population health and healthcare;
- Tackling unequal outcomes and access;
- Enhancing productivity and value for money; and
- Helping the NHS to support broader social and economic development.



3 Planning Policy

3.1 National Planning Policy

3.1.1 National Policy Statements (NPS) set out the policy basis for NSIPs including for ground mounted solar developments. The NPSs that are relevant to the Scheme are Overarching National Policy Statement for Energy (EN-1), National Policy Statement for Renewable Energy Infrastructure (EN-3) and National Policy Statement for Electricity Networks Infrastructure (EN-5), dated November 2023 and designated on 17 January 2024, and are important material considerations, in addition to other relevant and important national and local planning policies. The policies that relate to human health are summarised below.

Overarching National Policy Statement for Energy (EN-1)

3.1.2 Section 4.4 of NPS EN-1 (Ref.6) directly refers to the likely impacts of energy development on health, and thus the assessment requirements to ensure health impacts and suitable mitigation measures are identified.

3.1.3 Consideration of paragraph 4.4.3 is relevant to this chapter assessment as EN-1 requires the ES to consider how the Scheme “*may also affect the composition and size of the local population, and in doing so have indirect health impacts, for example if it in some way affects access to key public services, transport, or the use of open space for recreation and physical activity.*”

3.1.4 Paragraph 4.4.4 of EN-1 states that:

“...the ES should assess these effects for each element of the project, identifying any potential adverse health impacts, and identifying measures to avoid, reduce or compensate for these impacts as appropriate.”

3.1.5 Preliminary assessment results and mitigation requirements are set out in ES Chapter 18: Human Health [EN010170/APP/GH6.2.18] at Sections 18.8 and 18.9.

3.1.6 Paragraph 4.4.5 goes on to state that “*impacts of more than one development may affect people simultaneously, so the applicant should consider the cumulative impact on health in the ES where appropriate.*” Cumulative impacts on health are explored in ES Chapter 25: Cumulative Effects [EN010170/APP/GH6.2.25].

3.1.7 At paragraph 4.4.6, EN-1 sets out that:

“Opportunities should be taken to mitigate indirect impacts, by promoting local improvements to encourage health and wellbeing ... [including] potential impacts on vulnerable groups within society and impacts on those with protected characteristics under the Equality Act 2010, i.e. those groups which may be differentially impacted by a development compared to wider society as a whole”.

3.1.8 Vulnerable groups, or sub-populations have been identified in ES Chapter 18: Human Health [EN010170/APP/GH6.2.18] and their potential differences in sensitivity to changes has been accounted within the assessment of likely significant effects.

3.1.9 With respect to decision-making, paragraphs 4.4.7-8 set out that:



“Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.

However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise.”

3.1.10 To ensure that the relationship between different aspects of the Scheme are identified, sections 18.6-18.9 of ES Chapter 18: Human Health **[EN010170/APP/GH6.2.18]** refer to other chapters within the ES which pertain to effects on human health.

3.1.11 Chapter 5 of EN-1 also provides more specified policy and assessment requirements, many of which also pertain to human health by virtue of direct and indirect impacts. These are as follows, which are set out in more detail in the respective topic chapters elsewhere in the ES:

- Section 5.2: Air Quality and Emissions;
- Section 5.3 Greenhouse Gas Emissions;
- Section 5.7 Dust, Odour, Artificial Light, Smoke, Steam and Insect Infestation;
- Section 5.8 Flood Risk;
- Section 5.10 Landscape and Visual;
- Section 5.11 Land Use, Including Open Space, Green Infrastructure, and Green Belt;
- Section 5.12 Noise and Vibration;
- Section 5.13 Socio-Economic Impacts;
- Section 5.14 Traffic and Transport; and
- Section 5.16 Water Quality and Resources.

National Policy Statement for Renewable Energy Infrastructure (EN-3)

3.1.12 The adoption of EN-3 (Ref.7); in January 2024 now provides specific policy dedicated to solar photovoltaic generation (Section 2.10), and as such, the policies therein are directly relevant to this Scheme. NPS EN-3 does not contain any policy that explicitly relates to impacts on human health. However, by virtue of the inter-relationship between ES topics, it is pertinent that secondary impacts relating to matters such as public rights of way, water management, landscape, visual and residential amenity, glint and glare, and construction traffic, noise, and vibration. Where relevant, these are considered in relation to human health.



National Policy Statement for Electricity Networks Infrastructure (EN-5)

3.1.13 As the Scheme contains high-voltage electrical cabling to transmit generated electricity to the National Grid, sections of EN-5 (Ref.8) pertaining to electromagnetic fields (EMF) are considered.

3.1.14 Paragraph 2.9.46 states that for assessment consideration:

“All overhead power lines produce EMFs. These tend to be highest directly under a line and decrease to the sides at increasing distance. Although putting cables underground eliminates the electric field, they still produce magnetic fields, which are highest directly above the cable. EMFs can have both direct and indirect effects on human health, aquatic and terrestrial organisms.”

3.1.15 As a result of this requirement to consider EMF, ES Chapter 18: Human Health **[EN010170/APP/GH6.2.18]** includes assessment of the likely effects on human health by EMFs from cables operating at a voltage of 132kV or greater.

3.1.16 When considering mitigation measures for EMF impacts, paragraphs 2.10.11-13 also sets out that high voltage power lines should be adequately located, insulated, and protected to comply with public exposure guidelines. Notably, the policy states at paragraph 20.10.13:

“Where EMF exposure is within the relevant public exposure guidelines, re-routing a proposed overhead line purely on the basis of EMF exposure or undergrounding a line solely to further reduce the level of EMF exposure are unlikely to be proportionate mitigation measures.”

National Planning Policy Framework (NPPF)

3.1.17 The most recent version of the NPPF, amended December 2024 and February 2025 (Ref.9), provides policy context at chapter 8 for the support and promotion of healthy and safe communities, at chapter 12 for achieving well-designed and beautiful places, and chapter 15 for conserving and enhancing the natural environment.

3.1.18 The policy set out within the NPPF is defined by *“three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways”*, these are “economic”, “social”, and “environmental” (paragraph 8). These three objectives each have facets relating to human health.

3.1.19 Chapter 8 of the NPPF sets out policy to improve the achievement of health, inclusive and safe places through promoting social interaction, safety and accessibility, most pertinently through creation and improvement of safe and easily accessible pedestrian and cycle routes (paragraph 96). The policy furthermore promotes the provision and protection of green infrastructure, sports facilities, and social facilities to meet community needs (paragraphs 96-97). The NPPF goes on to state the importance of protecting existing open space and recreational facilities (paragraph 103) and proactively seeking to *“protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users”* (paragraph 104).

3.1.20 Paragraph 135 in chapter 12 of the NPPF emphasises the importance of developments playing a role in helping to *“establish or maintain a strong sense*



of place”, important for long-term community identity wellbeing, and ensuring that they:

“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience”.

- 3.1.21 Finally, chapter 15 of the NPPF sets out that *“planning policies and decisions should contribute to and enhance the natural and local environment”* including by *“recognising the intrinsic character and beauty of the countryside”*, and preventing new and existing development from contributing to unacceptable levels of pollution (paragraph 180). The NPPF also explicitly seeks to ensure that *“new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment”* including with regard to mitigating and minimising noise impacts on health, wellbeing and tranquillity, and the impact of light pollution on local amenity (paragraph 191), while also ensuring development complies with *“relevant limit values or national objectives for [waterborne or airborne] pollutants”* (paragraph 192).

3.2 Local Planning Policy

- 3.2.1 Local planning policy is set out in the host local authorities’ adopted policy documents, consisting of their adopted Local Plans including made neighbourhood planning policies.
- 3.2.2 Each of the constituent authority areas within the Wider Baseline Study Area have their own ‘Joint Strategic Needs Assessment’ (JSNA) which gives an up-to-date overview of the health and wellbeing conditions in the population of each of the authority areas. These documents are based on research and community consultation to determine what factors have the greatest impact on health and wellbeing, and where the greatest challenges and inequalities exist.

North Northamptonshire

- 3.2.3 North Northamptonshire is one of three host authorities to the Scheme, and thus dictates planning policy for those parts of the Scheme that fall within the Council’s administrative boundary, these being Green Hill C, D, E, BESS, F, and large portions of the Cable Route Search Area.

North Northamptonshire Joint Strategic Needs Assessment

- 3.2.4 The North Northamptonshire Joint Strategic Needs Assessment (Ref.10) is a live document made of continuously updated publications, curated by the North Northamptonshire Health and Wellbeing Board to ensure that they meet their requirement to provide a strategic lead for the health, care and wellbeing system.
- 3.2.5 The overall purpose of the Board is to secure:
- better health and wellbeing outcomes for the local population;
 - better quality of care for all patients and care users;
 - better value for the taxpayer; and



- a reduction in the health and wellbeing outcomes gap (inequalities) between different groups.

3.2.6 The JSNA indicates that areas of key challenges and focus for North Northamptonshire are improving health and wellbeing outcomes in relation to physical activity, good food and healthy eating, healthy weight, and mental health in adults.

North Northamptonshire Joint Core Strategy

3.2.7 The North Northamptonshire Joint Core Strategy 2011 to 2031 (adopted July 2016) (Ref.11); provides strategic-level planning and development policy for the unitary authority of North Northamptonshire.

3.2.8 The adopted policies deemed to be of most relevance from the North Northamptonshire Joint Core Strategy to human health and wellbeing factors, are:

- Policy 7 – Community Services and Facilities
- Policy 8 – North Northamptonshire Place Shaping Principles
- Policy 10 – Provision of Infrastructure
- Policy 19 – The Delivery of Green Infrastructure
- Policy 20 – Nene and Ise Valleys
- Policy 22 – Delivering Economic Prosperity
- Policy 26 – Renewable and Low Carbon Energy
- Policy 31 – Gypsies and travellers and travelling show people

Wellingborough Local Plan

3.2.9 The Wellingborough Local Plan (Part 2), adopted February 2019 (Ref.12), provides local level development management policy for the area covered by the former Borough Council of Wellingborough. As such, the policies therein are read alongside those in the North Northamptonshire Joint Core Strategy. The adopted policies deemed to be of most relevance from the Wellingborough Local Plan (Part 2) to human health and wellbeing are:

- Policy GI 1 – Local Green Infrastructure Corridors
- Policy GI 2 – Local Open Space
- Policy GI 5 – Enhancement and Provision of Sport and Recreation Facilities

Earls Barton Neighbourhood Plan

3.2.10 The Earls Barton Neighbourhood Plan 2011-2031 (Ref.13) was formally made on 19 January 2016, and thus is part of the adopted development plan for North Northamptonshire. The policies deemed to be of most relevance to human health and wellbeing are:



- EB.D1: High standard of design
- EB.OS1: Protection of Open Green Places
- EB.DC1: Delivery of infrastructure

Ecton Neighbourhood Development Plan

3.2.11 Ecton Neighbourhood Development Plan 2016-2031 (Ref.14) was formally made on 22 June 2021, and thus is part of the adopted development plan for North Northamptonshire. The policies deemed to be of most relevance to human health and wellbeing are:

- Policy 5 - The provision of new community facilities
- Policy 6 – Local Green Space
- Policy 10 – Important public views and vistas
- Policy 11 – Natural features and landscape works

West Northamptonshire

3.2.12 West Northamptonshire is another of the three host authorities to the Scheme, and thus dictates planning policy for those parts of the Scheme that fall within the Council's administrative boundary, these being Green Hill A, A.2, B, and large portions of the Cable Route Search Area.

West Northamptonshire Joint Strategic Needs Assessment

3.2.13 The West Northamptonshire Joint Strategic Needs Assessment (Ref.15) operates similarly to that of North Northamptonshire, with a continuously updated feed of documents, curated by the West Northamptonshire Health and Wellbeing Board.

3.2.14 The Board's aims include:

- promoting health equity;
- addressing health inequalities; and
- fostering a culture of inclusivity.

3.2.15 The JSNA indicates that areas of key challenges and focus for North Northamptonshire are improving health and wellbeing outcomes in relation to mental health and emotional wellbeing in young people, physical activity, healthy weight, air quality, community safety due to violent crime, health inequalities due to ethnicity, health inequalities due to deprivation.

West Northamptonshire Joint Health and Wellbeing Strategy

3.2.16 Prepared by the West Northamptonshire Health and Wellbeing Board, the West Northamptonshire Joint Health and Wellbeing Strategy 2023-2028 (Ref.16) sets out strategic aims for the improvement of health and wellbeing in the local authority area.



- 3.2.17 The strategic ambitions of the document include: committing to improving quality of life for babies and children through preventing avoidable health risks and reducing inequalities in children's livelihoods and education, exploring opportunities to improve population fitness and independence, employment and housing; achieving greater community safety and interpersonal connectivity within families and communities; reducing exclusion due to homelessness, offences, and providing support for addictive behaviour; and improving access to health and social care and celebrating diversity and inclusivity.

West Northamptonshire Joint Core Strategy

- 3.2.18 Much in the same manner as North Northamptonshire, planning policy in West Northamptonshire operates in two levels, with strategic planning and development policy for the unitary authority area covered by the West Northamptonshire Joint Core Strategy Local Plan (Part 1), adopted December 2014 (Ref.17). The adopted policies deemed to be of most relevance from the West Northamptonshire Joint Core Strategy to human health and wellbeing are:

- Policy SA – Presumption in Favour of Sustainable Development
- Policy S10 – Sustainable Development Principles
- Policy S11 – Low Carbon and Renewable Energy
- Policy C1 – Changing Behaviour and Achieving Modal Shift
- Policy C5 – Enhancing Local and Neighbourhood Connections
- Policy E6 – Education, Skills and Training
- Policy BN1 – Green Infrastructure Connections
- Policy BN5 – The Historic Environment and Landscape
- Policy BN7A – Water Supply, Quality and Wastewater Infrastructure
- Policy BN7 – Flood Risk
- Policy BN9 – Planning for Pollution Control
- Policy BN10 – Ground Instability
- Policy INF1 – Approach to Infrastructure Delivery
- Policy R1 – Spatial Strategy for the Rural Areas
- Policy R2 – Rural Economy
- Policy R3 – A Transport Strategy for the Rural Areas

Daventry Local Plan (Part 2)

- 3.2.19 The Daventry Local Plan (Part 2), adopted February 2020 (Ref.18) (Settlements and Countryside Local Plan For Daventry District 2011-2019), provides local level development management policy for the area covered by the former Daventry District. As such, the policies therein are read alongside those in the West Northamptonshire Joint Core Strategy.



3.2.20 In relation to the Scheme, this covers the Sites at Green Hill A, Green Hill A.2, and Green Hill B, and the cable route between these Sites and Green Hill C. The adopted policies deemed to be of most relevance from the Daventry Local Plan (Part 2) to human health and wellbeing are:

- SP1 – Daventry District Spatial Strategy
- RA6 – Open Countryside
- HO9 – Gypsies, Travellers and Travelling Showpeople
- ST1 – Sustainable Transport Infrastructure
- ENV1 – Landscape
- ENV4 – Green Infrastructure
- ENV9 – Renewable Energy and Low Carbon Development
- ENV10 – Design
- ENV11 – Local Flood Risk Management
- CW1 – Health and Wellbeing

South Northamptonshire Local Plan (Part 2)

3.2.21 South Northamptonshire Local Plan (Part 2) (2011-2029), adopted July 2020 (Ref.19), provides local level development management policy for the area covered by the former South Northamptonshire District. As such, the policies therein are read alongside those in the West Northamptonshire Joint Core Strategy. This policy document is only relevant to the Scheme for the area of the cable corridor that falls within South Northamptonshire – this being the area within Cogenhoe and Whiston, Castle Ashby, and Yardley Hastings.

3.2.22 The adopted policies deemed to be of most relevance from the South Northamptonshire Local Plan (Part 2) to human health and wellbeing are:

- Policy SS2: General Development and Design Principles
- Policy LH11: Gypsy, Travellers and Travelling Show People
- Policy EMP1: Supporting Skills
- Policy EMP3: New Employment Development
- Policy EMP4: The Visitor Economy
- Policy EMP6: Farm Diversification
- Policy INF1: Infrastructure Delivery and Funding
- Policy INF2: Community Facilities
- Policy INF3: Education Facilities
- Policy GS1: Open Space, Sport and Recreation
- Policy HE3: Historic Parks and Gardens



- Policy NE3: Green Infrastructure Corridors

Moulton Neighbourhood Development Plan

3.2.23 Moulton Neighbourhood Development Plan 2014-2029 (Ref.20) was formally made on 2 December 2016, and thus is part of the adopted development plan for West Northamptonshire. The policies deemed to be of most relevance to human health and wellbeing are:

- Policy SD 1 – Promoting Sustainable Transport
- Policy SD 2 – Adapting to Climate Change
- Policy CS1 – Provision of Community Infrastructure
- Policy CS2 – Local Services and Community Facilities
- Policy E1 – Protect Existing Local Green Spaces

Overstone Neighbourhood Development Plan

3.2.24 Overstone Neighbourhood Development Plan 2019-2029 (Ref.21) was formally made on 3 December 2021, and thus is part of the adopted development plan for West Northamptonshire. The policies deemed to be of most relevance to human health and wellbeing are:

- Policy 1 – Promoting Sustainable Transport
- Policy 2 – Adapting to Climate Change
- Policy 3 – Provision of Community Infrastructure
- Policy 4 – Local Services and Community Facilities
- Policy 8 – Landscape and Sensitive Views

Milton Keynes

3.2.25 Milton Keynes is the southernmost of the three host authorities to the Scheme, and thus dictates planning policy only for Green Hill G and the immediately connecting section of the Cable Route Search Area.

Milton Keynes Joint Strategic Needs Assessment

3.2.26 The Milton Keynes Joint Strategic Needs Assessment (Ref.22) is overseen by the Public Health Evidence and Intelligence team, which also provides shared resourcing with Bedford Borough Council and Central Bedfordshire Council. The Milton Keynes JSNA identifies community safety due to violent crime, teenage pregnancy, baby and toddler health, mental health in children, children and youth development, health inequalities due to deprivation, healthy weight, and homelessness as the Council's biggest challenges and areas to improve health and wellbeing inequalities.



Milton Keynes Health and Wellbeing Strategy

- 3.2.27 The evidence base provided by the Milton Keynes JSNA has been used to inform the local authority's Health and Wellbeing Strategy (2018 – 2028) (Ref.23) which sets out the strategic aims for improving health outcomes and reducing inequalities within the Milton Keynes Area.
- 3.2.28 The Health and Wellbeing Strategy prioritises consultation and collaboration between people, health and care providers, and policy makers to deliver its ambitions. The strategic priorities are categorised under the “starting well”, “living well”, and “aging well” to distinguish relevant health and wellbeing needs at different stages of life. Within these categories, the strategic priorities include: reducing abuse, neglect, and isolation at all ages; promoting better mental health and providing greater resource to provide mental health care and support; improving diet, activity, and associated long-term health conditions (such as obesity and diabetes); and providing support to improve inequalities in education, employment, and social cohesion.

Plan:MK

- 3.2.29 The local plan for Milton Keynes City, titled Plan:MK 2016-2031 (Ref.24), was adopted in March 2019 and provides local planning policy, both for strategic development and development management. In relation to the Scheme, these policies are relevant to Green Hill G. The adopted policies deemed to be of most relevance from Plan:MK to human health and wellbeing are:
- Policy DS3 Employment Development Strategy
 - Policy DS5 Open Countryside
 - Policy SD1 Place-Making Principles for Development
 - Policy ER8 Employment Uses and The Rural Economy
 - Policy ER17 Tourism, Visitor and Cultural Destinations
 - Policy HN6 Housing for Temporary Accommodation
 - Policy HN11 Gypsies and Travellers
 - Policy HN12 Travelling Showpeople
 - Policy CT1 Sustainable Transport Network
 - Policy CT2 Movement and Access
 - Policy CT3 Walking and Cycling
 - Policy EH5 Health Facilities
 - Policy EH6 Delivery of Health Facilities in New Development
 - Policy EH7 Promoting Healthy Communities
 - Policy INF1 Delivering Infrastructure
 - Policy FR1 Managing Flood Risk
 - Policy NE4 Green Infrastructure



- Policy NE5 Conserving and Enhancing Landscape Character
- Policy NE6 Environmental Pollution
- Policy L2 Protection of Open Space and Existing Facilities
- Policy L3 Change of Use of Amenity Open Space
- Policy D1 Designing a High Quality Place
- Policy D2 Creating a Positive Character
- Policy D5 Amenity and Street Scene
- Policy CC3 Protection of Community Facilities
- Policy SC2 Community Energy Networks and Large Scale Renewable Energy Schemes
- Policy SC3 Low Carbon and Renewable Energy Generation

Lavendon Neighbourhood Plan

3.2.30 Lavendon Neighbourhood Plan 2019 to 2031 (Ref.25) was formally made on 18 March 2020, and thus is part of the adopted development plan for Milton Keynes City. The policies deemed to be of most relevance to human health and wellbeing are:

- Policy E1: Access to the Countryside
- Policy E2: Biodiversity Offset and Development
- Policy E3: Trees and Hedgerows
- Policy CD1: Conservation and Heritage
- Policy CD2: High Quality Design
- Policy FR1: Development and Flood Risk
- Policy HT1: Transport, Highways and New Development
- Policy CF1: Community Facilities
- Policy CF2: Community Open Space
- Policy BE1: Business and Employment

Bedford Borough Council

3.2.31 Although not one of the host authorities, Bedford Borough is likely to experience some level of changes to the human health environment as a result of the Scheme, even if limited to socio-economic derived effects, such as employment and income, and education and skills. As such, the assessment of human health impacts takes into consideration strategic health objectives for Bedford Borough.



Bedford Borough Joint Strategic Needs Assessment

- 3.2.32 The Bedford Borough Joint Strategic Needs Assessment (Ref.26) is overseen by the Public Health Evidence and Intelligence team, which provides shared resourcing with Milton Keynes City Council and Central Bedfordshire Council. The Bedford Borough JSNA identifies community safety due to burglary and vehicle crime, children and youth development, health inequalities due to deprivation, healthy weight, mental health.

3.3 Emerging Local Planning Policy

- 3.3.1 In addition to adopted policy documents, relevant emerging policy documents are considered as part of the local planning policy context, where such emerging policies are in a relatively progressed stage, and are unlikely to change considerably prior to adoption. Their status has been kept under review through drafting of the ES ahead of DCO submission to ensure the most up-to-date position is considered.
- 3.3.2 The emerging North Northamptonshire Local Plan (Ref.27) is a proposed strategic planning document to replace the existing North Northamptonshire Joint Core Strategy. The emerging plan is proposed to also take on some non-strategic planning policies from the Part 2 development management plans that form part of the Local Development Plan for North Northamptonshire. The emerging plan is in early draft and is due for publication consultation in early 2026. Emerging policies deemed to be of most relevance to human health factors will be monitored as they are published, although this is anticipated to be after commencement of the DCO examination.
- 3.3.3 Similarly, West Northamptonshire Council is currently preparing their New Local Plan for West Northamptonshire (Ref.28) which will once published replace the current adopted West Northamptonshire Joint Core Strategy Local Plan (Part 1) and the Part 2 Local Plans. Draft policies published for Regulation 18 Draft Plan consultation from April to June 2024, with final draft policies due for publication consultation in October 2025. Emerging policies deemed to be of most relevance to human health factors will be monitored as they are published, although this is anticipated to be after commencement of the DCO examination.
- 3.3.4 Milton Keynes City Council have in Autumn 2024 consulted upon their emerging draft Milton Keynes City Plan 2050 (Ref.29), which will replace their existing Plan:MK document upon adoption. This document will provide strategic and development management policies for the Milton Keynes City area. Notably, the draft plan contains specific policy strategies for the location of solar PV installations. The accompanying draft policy maps demonstrate that Green Hill G is located within the draft "Solar Farm Area of Search" (Ref.30). Furthermore, the provision of HIA for major developments has been continued as a draft policy requirement, however the policy wording so far does not specifically refer to energy infrastructure. Emerging policies deemed to be of most relevance to human health factors will be monitored as they are published.



4 Guidance

4.1 National and Industry Guidance

National Planning Practice Guidance

4.1.1 The National Planning Practice Guidance (PPG) (Ref.31) is a suite of web-based resources to provide additional guidance to support the NPPF, and are updated on an ongoing basis to reflect changes to policy and industry guidance.

4.1.2 Specific guidance: “Renewable and low carbon energy” (Ref.32) contains some matters for applicant considerations with regard to solar photovoltaic development and battery energy storage systems. These matters indirectly relate to human health, specifically in regard to guidance setting out need to consider the proposal’s visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety (paragraph 013), and for applicants to engage with the relevant local fire and rescue service to ensure prevention of major fire incidents (paragraph 034).

4.1.3 Directly related to human health is guidance for “Healthy and safe communities” (Ref.33) which states:

“It is helpful if the Director of Public Health is consulted on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment is a useful tool to use where there are expected to be significant impacts.” (paragraph 005).

4.1.4 Whilst primarily targeted for local authorities, this guidance also provides helpful guidance for applicants, including setting out how planning for healthier communities can contribute to more successful planning outcomes by contextualising the policy aspirations for the creation of environments that support and encourage healthy lifestyles (paragraph 001).

4.1.5 PPG “Open space, sports and recreation facilities, public rights of way and local green space” (Ref.34) goes on to provide additional guidance on the types and designations of open spaces and recreational facilities, and the “*health and recreation benefits to people living and working nearby*” derived from having good access to these (paragraph 001).

4.1.6 With specific regard to public rights of way, the PPG refers to The Defra Rights of Way circular (1/09) (Ref.35) which contains guidance on the consideration of rights of way in association with development. The Circular also covers the statutory procedures for diversion or extinguishment of a public right of way.

IEMA Guide to Effective Scoping of Human Health in Environmental Impact Assessment (2022)

4.1.7 Published in November 2022, IEMA’s Guide to Effective Scoping of Human Health in Environmental Impact Assessment (Ref.36) provides professional industry guidance for practitioners commissioning, conducting and reviewing EIAs to ensure the assessment of human health is suitably scoped to identify human health impacts in a proportionate manner to the type of development proposed. The guide emphasises the need to take a holistic approach to health,



considering physical, mental and social dimensions of health, as well as health inequalities.

IEMA Guide to Determining Significance for Human Health in EIA (2022)

- 4.1.8 Alongside, and published in November 2022 with, the Guide to Effective Scoping, IEMA's Guide to Determining Significance for Human Health in EIA (Ref.37) provides an industry framework for EIA practitioners to identify, describe and assess potential direct and indirect effects to human health arising from major developments. Emphasis is placed on the requirement for evidence and contextual explanation to justify the application of professional judgement towards the determination of significance of effects. Furthermore, the guide specifies the requirement to identify and assess impacts on vulnerable population sub-groups that may be affected by a development to a greater extent than the general public.

HUDU Planning for Health Rapid Health Impact Assessment Tool (2019)

- 4.1.9 The fourth edition of the NHS London Healthy Urban Development Unit Planning for Health Rapid Health Impact Assessment Tool (Ref.38) was published in October 2019, and is designed to assess the likely health impacts of development plans and proposals, albeit primarily for urban developments. The tool is aimed to provide a quick assessment of likely health impacts across eleven topics or broad determinants of health to identify if further assessment is required. These determinants largely correlate with those used by IEMA in their guidance.

PHE Spatial Planning for Health An evidence resource for planning and designing healthier places

- 4.1.10 Public Health England published its guidance document Spatial Planning for Health An evidence resource for planning and designing healthier places (Ref.39) in June 2017.
- 4.1.11 This guidance seeks to *“address the need for a UK-centric evidence review that analyses and demonstrates the links between health and the built and natural environment”* by providing *“an overview, based on the umbrella review methodology outlined in this document, of the strength of the evidence of the impacts on health of the built and natural environment”* (PHE, 2017, pg.5).
- 4.1.12 Although targeted at local public health professionals, *“the findings are designed to be suitable for both public health practitioners and planning professionals, facilitating two-way communication between disciplines”* (PHE, 2017, pg.5).
- 4.1.13 The guidance is categorised into five key sections to articulate the relationship between environment and health. These are: neighbourhood design, housing, food environment, natural and sustainable environments, and transport. Each section is supported by an evidence review which is used to determine pathways between planning principles, impacts, and health outcomes.

PHE Health Impact Assessment in spatial planning

- 4.1.14 Following its 2017 guidance, PHE published its Health Impact Assessment in spatial planning: A guide for local authority public health and planning teams (Ref.40) in October 2020. Although its principal target is local authority public health teams and wider health and social care partners, the guidance is also



anticipated to be used by local authority planning teams and those responsible for plan-making and decision making on planning applications and planning applicants, consultants and others involved in the planning process to ensure that the production and review of health impact assessments is undertaken collaboratively and to the same guidance.

PHE Strategy 2020-2025

- 4.1.15 The PHE Strategy 2020-2025 (Ref.41) published 2019 sets out the five year strategic objectives of PHE towards achieving improved health conditions in England. It should however be noted that in 2021, Public Health England was dissolved and its powers and responsibilities distributed to the UK Health Security Agency and Office for Health Improvement and Disparities. Guidance published by Public Health England is nonetheless official guidance and is only superseded where stated.

WHIASU Health Impact Assessment A practical guide

- 4.1.16 Although primarily targeted at providing guidance for health impact assessment in Wales, the 2012 Health Impact Assessment: A practical guide (Ref.42), published by the Wales Health Impact Assessment Support Unit, is identified as an exemplary piece of guidance primarily to support the production and review of health impact assessments, and is referred to in multiple other pieces of guidance at a national and local level in England.
- 4.1.17 The guidance acts as a step-by-step toolkit, offering support and guidance on conducting health impact assessment through a five-step programme consisting of: screening, scoping, appraisal of evidence, reporting and recommendations, and monitoring and evaluation. Each section provides a summary of expectations and requirements to ensure a suitable assessment is carried out.

Fair Society, Healthy Lives: The Marmot Review

- 4.1.18 Fair Society, Healthy Lives: The Marmot Review (Ref.43) was published in February 2010 following an independent review to propose the most effective evidence-based strategies for reducing health inequalities in England from 2010. The report concluded that a person's social position had a demonstrable impact upon their health, and overall health inequalities were resulting in a substantial number of premature deaths. The review conclude that:

“Reducing health inequalities will require action on six policy objectives: Give every child the best start in life, enable all children young people and adults to maximise their capabilities and have control over their lives, create fair employment and good work for all, ensure healthy standard of living for all, create and develop healthy and sustainable places and communities, [and] strengthen the role and impact of ill health prevention”.

Health Equity in England: The Marmot Review 10 Years On

- 4.1.19 Published in February 2020 by much of the same team as The Marmot Review in 2010, Health Equity in England: The Marmot Review 10 Years On (Ref.44) explored how health inequalities have changes through the decade 2010-2020. The report's findings concluded that improvements to life expectancy stagnated, and in some sectors of the population fell. This report exposed increasing health



inequalities as a result of deprivation, linked to a greater north/south divide in health inequality. The report resultantly goes on to provide recommendations for government action to improve upon health inequalities to ensure national health and wellbeing at a societal level can improve into the future.

Build Back Fairer: The COVID-19 Marmot Review

- 4.1.20 In the wake of the 2020 coronavirus pandemic, the Institute of Health Equity published Build Back Fairer: The COVID-19 Marmot Review - The Pandemic, Socioeconomic and Health Inequalities in England (Ref.45). This report was published to update the findings of The Marmot Review 10 Years On in the context of evidence of health inequalities effecting the response to, and arising from, the COVID-19 pandemic.

NHS Long-Term Plan

- 4.1.21 The NHS Long Term Plan, published January 2019 (Ref.46), sets out the strategic objectives for the NHS over the ten years from 2020-2030 to improve health and social care provision across the UK to address ongoing concerns with funding, staffing, inequalities, and pressures from a growing and ageing population. This includes focussing on wider action on prevention will help people stay healthy and also moderate demand on the NHS, while looking to help tackle health inequalities, through providing funding allocations to local areas on more accurate assessment of health inequalities and unmet need.

4.2 Local Guidance

Milton Keynes Health Impact Assessment (HIA) Supplementary Planning Document (SPD)

- 4.2.1 The MK HIA SPD adopted March 2021 (Ref.47), provides specific guidance for the requirement and production of a Health Impact Assessment for development falling within Milton Keynes City. The guidance is specifically published to support Plan:MK Policy EH6: Delivery of health facilities in new development (Ref.24), and as such is primarily for assessment of health impacts associated with large-scale housing developments. Nevertheless, the overall guidance set out in the SPD, where consistent with national guidance for assessment of health impacts for non-residential development is considered as part of the assessment in ES Chapter 18: Human Health **[EN010170/APP/GH6.2.18]**.

Suffolk County Council Energy and Climate Adaptive Infrastructure Policy: Community Engagement and Wellbeing SPD

- 4.2.2 Although not directly geographically related to the Scheme, Suffolk County Council's Community Engagement and Wellbeing SPD, adopted September 2024 (Ref.48) provides a useful guide to determine the scope and requirements for promoters of NSIPs to effectively engage with affected communities and how to effectively scope and assess mental health and wellbeing matters resulting from a large-scale project. As such, these measures are useful considerations for this Scheme.
- 4.2.3 This includes securing effective dialogue with communities about the nature of promoted schemes to convey information and to build trust with communities by building a framework for discussion, mutual trust and resolution of concerns. The



guidance goes on to define the scope and type of assessment that should be undertaken to assess impacts on community wellbeing. Of particular note, the SPD highlights:

“...many of the processes that are most likely to result in mental wellbeing impacts, take place outside the temporal scope of the Environmental Impact Assessment (EIA). This largely eliminates the opportunity to identify and mitigate these impacts through the EIA. Therefore, identification of potential harm and appropriate mitigation measures must be integrated into the pre-application consultation process.”

- 4.2.4 Finally, the guidance sets out measures on how promoters should seek to engage in continuous dialogue with community leaders to safeguard and support ongoing community wellbeing including throughout a scheme’s lifetime.



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