

Thank you for considering my late representations.

Since my Public Comment submitted 26/04/24, I note a Noise Impact Assessment has been produced and uploaded onto the planning portal.

I have read this and have concerns about discrepancies in the data, but also some other aspects of the report. I have quickly compiled these below.

I would like the case officer, Ben Haywood and Councillors on the planning committee to be aware of the problems with the data and perhaps request this application is deferred so the noise report can be revised, to include clear and correct historical data and most importantly that it includes all noise generating plant associated with the proposed development. Not just the BESS.

I note there are 3 invertors included on the plan, by the entrance to the solar array. Inverters generate noise and will need cooling systems, which are also noise generators. So this should have also been included in the Noise Impact Assessment.

Furthermore I would like to stress the importance of maintaining the previous planning conditions imposed at the site in relation to SMD/2019/0057.

Condition 4 ensured the East Access was for maintenance only.

Ensuring that All vehicles use the West entrance. Due the narrower nature of the lane past this point. The East access is unsuitable for the large vehicles proposed for deliveries as part of the construction traffic.

Condition 16 protecting the turning area.

For life of the development, it is unsuitable to site the BESS container in this area, blocking the turning circle.

Condition 35, no containers, to protect the local amenity.

Please note the considerations of the Noise Impact Assessment below. I have cut and paste elements of the report and commented for ease of reference.

2.1 Proposed Development

The planned proposal has included a solar farm comprising of a photovoltaic (PV) array of

887 No. units, associated infrastructure including underground cabling and a containerised Battery Energy Storage System (BESS). No new substation or similar network transmission equipment has been proposed as part of the installation.

The noise generating aspects associated with the operational phase of the proposal have been limited to the BESS container, given that PV arrays do not generate audible noise and there would be no other noise-emitting elements. Specifically, the proposed containerised BESS has included a ventilation and cooling system to one end and houses modules of electrical equipment within.

This is untrue.

The application includes 3 Inverters.

Inverters are noise emitting.

Why have these been excluded from the report?

Given this above omission, what other omissions or errors may have been made in the report?

I go on to state the ones I've seen. I do not feel this is a document fit for purpose or decision making.

3.4.3 Example Planning and Noise Condition (SMD/2019/0057)

Reference has been given to former planning permission at the Site (SMD/2019/0057, approved 23rd December 2019), that required the following standard of environmental noise to be achieved from the instatement of mechanical plant.

"21. The machinery, plant or equipment including installed or operated in connection with the carrying out of this permission shall be so enclosed and/or attenuated that the noise generated by the operation of the machinery shall not increase the background noise levels during day time expressed as LA90 [1hour] (day time 07:00-23:00 hours) and/or (b) LA90 [15mins] during night time (night time 23:00-07:00 hours) at any adjoining noise sensitive locations or premises in separate occupation above that prevailing when the machinery is not operating.

Noise measurements for the purpose of this condition shall be pursuant to BS4142:2014. The details and location of any plant or machinery to be installed under this permission shall be submitted to and approved in writing by the Local Planning Authority.

Reason:- To safeguard the amenity of local residents and that of the surrounding area from noise disturbance.

There have been issues with noise since the approval of SMD/2019/0057. Both during the day and after 23:00. Some of these have been reported and addressed.

Has further baseline data capture been avoided so not to show failings in noise attenuation?

That the development at the site does produce far more noise disturbance than the 2018 baseline, or is it simply there wasn't time to gather new data so we will use the old data?

4.1 Residual and Background Sound Levels

The 'typical' background sound levels have been reported in Table B in accordance with BS 4142 as established from histograms of the recorded dB LA90,15min data provided in Appendix C. These have been used to describe the underlying sound climate at NSRs during the proposed operating periods.

In line with Section 8.1.4 of BS 4142, the monitoring duration has reflected the range of background sound levels for the period assessed. In practice, there has been no single level for background sound where this is a fluctuating parameter, although a representative value of the period has been used based on the modal value. Note this has not been either the lowest or mean average value of dB LA90,T according to the assessment standard.

Table B: Summary of Measured Residual and Background Sound Levels

(I have not recreated the table in the email, apologies, please refer to table B , section 4.1. Which reports different background noise and different residual noise to that of the previous report created by Sound Solutions Consultants (Noise Impact Assessment technical report, 31554R2), despite apparently reporting that historical baseline data from November 2018.

Why have different numbers been used to the initial report?

Where the July 2023 data has come from is unclear. When the opening of this report referred to the baseline as November 2018; but it isn't using that data?

Table C has a note

"* Typical values of background sound level have been established from counts of data from Appendix C. "

When you look at the data from Appendix C, this is the November 2018 data and is shown in a different unit of measurement, See C1 and C2, using dBre 20uPa (sound pressure).

“It has been reported in Table B that the background sound levels of the area are low and especially so at night.”

It's a shame the report didn't also include the reference to limitations of equipment at extremely quiet/low noise levels. As I feel this is important and may be a limiting factor, misrepresenting the situation and adds further uncertainty to the results. (Please refer to Sound Solutions Consultants Noise Impact Assessment, technical report 31544R2. Section 4.9 and 4.11 of planning application SMD 2019/0057.

The proposed BESS container has been proposed with a cooling and ventilation system at the opposite end to the PCS. The proposed model MC50HDNC1U has been rated at a maximum of 65 dB LAeq,T at 1 m external to the container and assumed as east facing.

Why East facing?

This is then closest to the nearest noise sensitive receptor D Lawn Farm.

5.5 Statement of Uncertainty

Uncertainty has been considered as a limit to the accuracy of any noise assessment...

...It has been a requirement of the assessment standard BS 4142 to minimise uncertainty to a level commensurate with the intention of the assessment objective. Measures taken in this assessment to minimise uncertainty have included:

- Baseline sound levels have been measured over weekday and weekends periods and therefore provide a good indication of representative background and residual sound levels.

This is untrue. Looking at the table of data sound information was recorded from 4pm on Friday 23/11/18 until 10am Monday 26/11/18. Therefore there is no actual daytime data for Friday or Monday, the weekdays. This is only a weekend survey and therefore I do not agree that baseline sound levels have been recorded in a way to avoid uncertainty.

Thank you for considering this extra information.