

From: [REDACTED]
Sent: Thursday, June 6, 2024 12:52 PM
To: Section 62A Applications <section62a@planninginspectorate.gov.uk>
Subject: S62A/22/0006 Berden Hall Farm

Dear Inspector,

With reference to the draft planning conditions submitted re: **S62A/22/0006 Berden Hall Farm**, in the document titled "**Berden Solar Farm – Composite Version of Conditions – Final**" please consider the following:

PC13

Regarding footpaths and PROWs, it refers to "temporary diversions" agreed by the highway authority. Presumably, this condition should also clearly state:

- (a) the need for a Traffic Regulation Order for each and every such temporary diversion
- (b) a time restriction as such temporary diversions cannot be longer than 6 months.

In terms of the noise in PC24, PC25 and PC26, there does not seem to be any comments on either a maximum dB overall plus or a maximal permitted increase in dB above existing levels.

Specifically;

PC24

The council-preferred drafting is significantly better, as it includes consideration of octave-band (i.e.: frequency-dependent) noise levels, however critically, there is an argument to be made that BS 4142:2014+A1:2019 is not fit for purpose in this assessment, given that the main issue from the proposed plant is highly tonal, low frequency noise, and the guidance states on page 2 that "*The standard is not applicable to the assessment of low frequency noise.*" This is likely stated in the guidance because, when considering single-figure A-weighted noise levels (as is currently proposed in the applicant-preferred wording, and as is the approach in the BS4142 assessment methodology), the contribution of the low frequencies is diminished, meaning a noticeable subjective change in low-frequency noise *could* still result in little or no change to the overall A-weighted noise level and an outcome which does not align well with the subjective impact on NSRs. As such, the council's recommendation that resulting octave band levels do not exceed the measured background levels provides greater protection to NSRs and avoids this "low-frequency incompatibility" of the BS4142 methodology.

To ensure the NSRs proposed by the applicant are representative, it should be included that any assessment must include at least one of the worst-case receptors from each of the local areas Berden, Stocking Pelham (village) and Crabbs Green Farm. This would provide greater protection, to ensure assessment to certain key areas is not omitted.

PC25

There appears to be a simpler resolution here. We would suggest that measurements are taken both near to the installed plant AND at the NSRs, but with consideration to the fact

that any measurements are likely to include significant background interference. Although this may be the case at some frequencies, such an exercise would still prove useful in identifying any frequency domains which have noticeably increased. As above, changes to low frequency content of sound can often be hidden when only considering noise as a single-figure, A-weighted value.

A highly critical point here is to ensure testing is undertaken under peak/worst-case conditions (i.e.: on a sunny day during summer) as the load of the solar power captured will affect electrical noise levels.

It is then also critical that any proposed mitigation measures are implemented, as this was previously the issue at the Pelham Substation, where proposed screening mitigation was never sufficiently implemented.

PC26

Noted. In agreement with council-preferred wording.

Yours sincerely,

Tony Southam,
Chairman Stocking Pelham Parish Council
Duncan Murdoch,
Chairman , Berden Parish Council