



MIDKENT ENVIRONMENTAL HEALTH
MEMORANDUM

From: John McCullough Environmental Protection Team	To: Austin Mackie Planning Department
Date: 1st July 2022	Our Ref: 22/510557/GENPLA
Planning Details and Application Ref: PLANNING REF 22/501335/FULL UPRN 010095450872	
ADDRESS Land North Of Little Cheveney Farm, Sheephurst Lane, Marden.	
NATURE Installation of a renewable energy led generating station comprising of ground-mounted solar arrays, associated electricity generation infrastructure and other ancillary equipment comprising of storage containers, access tracks, fencing, gates and CCTV together with the creation of woodland and biodiversity enhancements.	

MAIN POINTS CONSIDERED:

Environmental Protection Issues. Acoustic Consultants report Project Ref 10253 by dB Consultation Ltd Document Ref: dBC/Origin/10253/ML/02

COMMENTS

I have reviewed the above report and there are a few issues.

- They have used BS4124 assessment for one location but not the other. This is based on the fact that location 2 had a very low background level and would have delivered an unfavourable assessment. I feel they should have done this and then used context (and other methodologies) to show that the impact was not excessive.
- They have picked the modal LA90 values but the modal value has 66% of the LA90 values lower than it and only 17% higher (this is not representative of worst case).
- UK Powernetworks acknowledge the impact of low frequency noise from their transformers and use NANR45 Procedure for the assessment of low frequency noise complaints as a supplementary assessment method. I would also suggest the use of Phon graphs. Both these use third octave bands to assess audibility and intrusion of LF noises. The NANR45 is for internal levels but it is possible to do assessments to predict internal levels and these would be very useful.
- Having a low background noise levels makes other noise source potentially more audible. This can mean that lower levels of noise that would be masked by other environmental noise can be more intrusive. Artificially working to a 30dB level is not a great assessment of the impact in a low background area.

- The use of a 4m barrier can be an issue with LF noise due to the long wavelengths of LF noise. I would like more information on this.

RECOMMENDATIONS:

That the application be refused unless further noise data is submitted.

I would recommend that the noise assessment is widened to include 1/3rd Octave Band spectra data (NANR45 and Phon) and BS4142 assessments done for all locations. They can use information from NANR45 and Phon charts to demonstrate impact rather than the generic 30dB level they set as NOEL as this is for non tonal steady traffic type noise which this is not.

Please do not hesitate to contact me for further advice or information in relation to this matter.

John McCullough

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