

Assessments need to be adequately completed to ensure the health and safety of the public, animals and wildlife.

NOISE AND VIBRATION

Existing noise environments are highly likely to be overstated in areas where the noise receptor was placed near a busy road. Properties are often set back from the road or shielded meaning representative noise levels are highly likely to be overstated and, as a result, internal operational noise is being shown as less significant than it actually would be. BS 4142 explicitly warns that context matters.

The applicant's assertion that the methodology was carried out 'in accordance with current policy and guidance' and 'agreed with all relevant statutory bodies' in their Responses to Written Representations at Deadline 1 does not demonstrate adequacy as real world application of methodology must be site and receptor specific.

Distance to the proposed solar farm and noise sources does not equate exposure and subsequently harmful impact. Property A may be closer than Property B but Property A may be shielded by terrain, vegetation or buildings and experience less of an impact.

Some of the sensitive noise receptors chosen have no windows facing the proposed solar farm so these are unlikely to be the worst affected properties as other properties at a very similar distance will face the proposed solar farm. Napier's research shows that orientation of the source matters and the applicant states 'the glazing element is the weakest path for external noise intrusion into internal areas' in their Responses to Written Representations at Deadline 1 so choosing properties that are not facing the proposed solar farm and assuming they are the worst affected is methodologically flawed. As a result, the noise impact is highly likely to be understated as no meaningful assessment of which property is most exposed to noise, and would be the most impacted, has been made.

Second floor bedrooms within the roof are of a much higher level than 4m above ground level so have unreasonably not been assessed and their omission renders the Environmental Statement incomplete. Some will face directly toward elevated sources of noise for this proposed solar farm which will increase the impact even further. World Health Organisation (WHO) guidance emphasises the importance of protecting bedrooms at night so second floor bedrooms need to be assessed.

Second floor bedrooms within the roof are structurally different and often more exposed compared to lower floors. To treat them as equivalent would be methodologically unsound. Second floor bedrooms within the roof are typically mainly constructed of timber frames, plasterboard linings and tiled coverings which have a weaker acoustic performance compared to brick therefore Napier's findings about dB reduction cannot be applied to them. Napier's research also explicitly states 'a thorough knowledge of the acoustic transmission characteristics afforded by the building envelope is therefore desirable to assist in the setting of threshold levels and to aid in the design and verification of development proposals.'

BS 4142 explicitly states that if noise has tonal, impulsive, or intermittent characteristics, a correction must be applied to the rating level if it is audible at the receptor. The applicant has stated in their Responses to Written Representations at Deadline 1 'it is considered that any intermittency associated with the proposed operations is unlikely to be readily distinctive against the residual environment' implying that manufacturer's data is indicating that the tonal, impulsive, or intermittent characteristics of the noise will be audible at receptors. Real world conditions can introduce characteristics not captured in manufacturer's data as well so it is essential assessment of perceptibility at receptors is carried out. For some areas of the scheme, the source of the noise is at a higher level than the road due to the sloping terrain. By dismissing penalties without assessment, the applicant has highly likely understated noise levels.

The Environmental Statement unreasonably fails to consider impacts on animals. Noise and vibration can cause distress to dogs, cats, horses and other animals. The applicant states in Environmental Statement Chapter 14: Noise and Vibration 'where noise and vibration effects are assessed to be not significant at the closest receptors, effects at all other receptors will also be not significant, regardless of sensitivity'. However, not all receptors are equally sensitive to impact so the applicant's methodology is flawed and breaches Environmental Impact Assessment (EIA) Regulations.

GLINT AND GLARE

Unreasonably, upper floors have not been assessed and assumptions about non occupancy during daylight hours are methodologically unsound, fail to reflect real world use and render the Environmental Statement further incomplete.

Glint and glare is a health and safety issue as well as an amenity issue. The applicant has repeatedly ignored statements highlighting the omission of upper floor windows and has failed to rectify the omission. Proportional mitigation cannot be implemented without full assessment.

Therefore, it is reasonable and necessary to require removal from the scheme of all fields visible from dwellings with first floor or second floor windows overlooking the proposed site.

MAJOR ACCIDENTS

The Applicant's statement that an Emergency Response Plan (ERP) will be developed post consent following NFCC and NFPA 855 guidance does not demonstrate adequacy.

Remote operation of a BESS site has repeatedly been identified as a factor delaying the emergency response to a BESS fire and hindering firefighting efforts. Despite this, the Outline Battery Storage Safety Management Plan (Revision A) still relies on remote operation as it states the BESS is anticipated to have '24/7 remote monitoring of the system via a dedicated control facility. The control facility will have the capability to shut the system down should the need arise and will also be responsible for implementing the emergency plan and acting as a point of contact for the emergency services'.

This shows the applicant has failed to address the documented real world issue of delayed response with remote operation and leaves a critical gap in safety and emergency planning.

FLOOD RISK

The Flood Risk Assessment and Drainage Strategy Annex J: Green Hill BESS (Revision A) incorrectly claims the site is wholly in Flood Zone 1 contradicting the Environment Agency's (EA's) classification.

The applicant's updated site specific Flood Risk Assessment (FRA) for Green Hill BESS relies on a partially updated 1D model produced by the EA in 2013 which contains data from the 1980s-2000s. A linked 1D-2D model with up to date data or a bespoke model with up to date data should be used as this site is not a low-vulnerability solar NSIP as stated by the applicant. The current and future risk in floodwater spreading across the site must be adequately quantified as it is critical for safety and emergency planning of the site as it is within Flood Zone 3.

Overall, the applicant has failed to adequately address previously identified issues, leaving them unresolved and in breach of legislation.