



Cairngorms
National Park Authority

Ùghdarras Pàirc Nàiseanta a'
Mhonaidh Ruaidh

Item 7 Appendix 4 8 December 2023

Agenda item 7

Appendix 4

2023/0381/DET

Environmental health officer response

Deirdre Straw

From: Planning
Sent: 27 November 2023 12:20
To: Planning
Subject: FW: 2023/0381/DET Application under s42 to amended condition 6 (noise barrier) of (2022/0069/DET)

From: Robin Fraser (Environmental Health (Mid 3)) <Robin.Fraser@highland.gov.uk>
Sent: 16 November 2023 10:11
To: Katie Crerar <KatieCrerar@cairngorms.co.uk>
Subject: RE: 2023/0381/DET Application under s42 to amended condition 6 (noise barrier) of (2022/0069/DET)

Hi Katie, I am happy to accept the amended wording. For the avoidance of doubt, I would just clarify that the updated noise assessment will need to demonstrate that the noise limits can be met based on full working capacity of the development.

Robin Fraser
Environmental Health Officer
Highland Council, 38 Harbour Road, Inverness, IV1 1UF
Telephone: 07879661365

From: Katie Crerar <KatieCrerar@cairngorms.co.uk>
Sent: Wednesday, November 15, 2023 2:41 PM
To: Robin Fraser (Environmental Health (Mid 3)) <Robin.Fraser@highland.gov.uk>
Cc: Planning <Planning@cairngorms.co.uk>
Subject: FW: 2023/0381/DET Application under s42 to amended condition 6 (noise barrier) of (2022/0069/DET)

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Good Afternoon Robin,
Many thanks for your response to the above application. That is very helpful.
I have spoken to the applicant and they have asked whether it would be reasonable to request an amendment to Condition 1 as suggested below:

1. Prior to the development commencing, the applicant shall provide a detailed specification of the proposed noise mitigation measures including details of the noise barrier and an updated noise assessment for the written approval of the Planning authority. The assessment should demonstrate that the barrier **in combination with other measures** can achieve a minimum reduction of 10dB as calculated at the curtilage of Aldon Lodge and that the following noise limits can be complied with.

The reason for this is that it would likely to be difficult to achieve 10db reduction with a single barrier and whilst they can comfortably meet the 32db limit at Aldon Lodge, it will be as a result of a barrier and other measures such as using quieter technology etc.

Can you let me know if you are content with this? I'm writing up the Committee Report with the intention to take it early December so if you are able to get back to me as soon as possible it would be hugely appreciated.

Kind Regards
Katie

Katie Crerar MRTPI (she/her)
Planning Officer – Development Management

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Usual working hours: Tuesday to Friday



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From: Robin Fraser (Environmental Health (Mid 3)) <Robin.Fraser@highland.gov.uk>
Sent: Tuesday, November 7, 2023 3:17 PM
To: Planning <Planning@cairngorms.co.uk>
Subject: 2023/0381/DET Application under s42 to amended condition 6 (noise barrier) of (2022/0069/DET)

I refer to the above application which requests an amendment to the wording of the previously consented development so that the conditioned noise limits apply to the development alone and not a cumulative limit applicable to the development and existing substation. The applicant has previously provided information which demonstrates that noise levels from the substation are negligible therefore I have no objection to this change.

The application also seeks to slightly increase the permitted noise limits from 30dB(A) to 33dB(A) at the two nearest noise sensitive locations East Croftmore and Aldon Lodge. My understanding is that the former is owned and occupied by the landowner and the applicant has suggested that they could be considered as financially involved. This approach is often taken in the case of wind farm developments. The suggestion is that a limit of 5dB above background would be reasonable for a financially involved receptor and I have no objection to that approach.

With regard to the non-financially involved receptor at Aldon Lodge, after discussions with the applicant and their noise consultant I am satisfied that the main reason for having a slightly raised limit is to provide a small buffer but that in practicality, it is extremely unlikely that noise levels would ever reach this limit. The main noise from battery energy storage sites comes from fans required to keep the system at an optimal temperature. The applicant has provided the information below which shows the correlation between outdoor temperature and the operational rating level that the cooling fans would need to work at. These systems are designed to operate in very warm climates so, at the temperatures typically found in the north of Scotland, it is unlikely that the fans would ever operate at more than 70% and even less likely that this would occur at night. This would equate to a reduction in predicted noise levels of around 5dB. In discussions, the applicant has suggested a limit of 32db(A) at the non-financially involved property and I have no objection to that approach.

The previously submitted noise impact assessment included the installation of an effective noise barrier designed to reduce noise levels by at least 10dB. The development should proceed in accordance with that. Similarly, the assessment stated that the best practicable means would be employed to reduce the impact of construction noise and the expectation is that this will be in place from the start of construction.

Information submitted by the applicant

Fan speed	100%	80%	
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Scenario	No mitigation	Acoustic hood	Delta	No mitigation	Acoustic hood	Delta	No mitigation
Sound pressure (db)	81.3	75.2	6.1	76.3	71.5	4.8	
Max power @ 50 degrees C	93%			84%			
Max power @ 40 degrees C	N/A			100%			
Max power @ 30 degrees C	N/A			100%			

What the above effectively shows is that, if it is 30 degrees, fans run at 70% speed if batteries are at 100% power. If it's 40 degrees, fans run at 80% speed. Looking at average temperature data of Aviemore ([see here](#)), this shows average daily high temperatures of c.19 degrees in July. Obviously there are extreme days though. Met Office tracks highest daily temperature by region, for North Scotland the max temperature ever recorded was 32.5 degrees, for Scotland as a country it is 34.8 degrees ([see here](#)). **Based on this data, the times that we'll be running the fans above 70% will be rare.** Whilst obvious, worth also noting that this this would only ever be during the day as well, when background noise levels are higher.

It's also worth noting a few typical operational characteristics of batteries:

- They like to charge when prices are cheap, typically late at night when temperatures are cooler.
- These night time prices are typically low for an extended period of time, meaning we are unlikely to import at 100% of power during the night, instead filling it more slowly.
- Batteries are most likely to export at peak power prices, which correspond with evenings, when temperatures are likely cooler.

I have no objection to the application to amend the existing condition and would propose the following wording: -

1. Prior to the development commencing, the applicant shall provide a detailed specification of the proposed noise barrier and an updated noise assessment for the written approval of the Planning authority. The assessment should demonstrate that the barrier can achieve a minimum reduction of 10dB as calculated at the curtilage of Aldon Lodge and that the following noise limits can be complied with.

2. The Rating Level of noise arising from the use of plant, machinery or equipment installed or operated in association with the development, must not exceed 33dB LAeq 15mins at the curtilage of East Croftmore and 32dB LAeq 15 mins at the curtilage of Aldon Lodge. The Rating Level should be calculated in accordance with BS 4142: 2014+A1:2019 *Methods for rating and assessing industrial and commercial sound.*"

4. In the event of any changes to the proposed equipment or mitigation measures which result in an increased noise level, then a revised noise impact assessment shall be submitted to and approved in writing by the Planning Authority, prior to any development commencing.

5. Within 4 weeks of the site becoming operational, having been fully tested and commissioned, the operator shall arrange for a competent person to undertake compliance monitoring and to prepare a report. Within 2 weeks of the monitoring exercise being completed, the compliance monitoring report shall be submitted for the written approval of the Planning Authority. If the monitoring identifies that condition 2 is not being met, the report shall include a proposed scheme of mitigation, including timescales, to ensure compliance can be achieved. Thereafter any mitigation measures shall be implemented in accordance with the approved scheme. Details of the compliance monitoring must be agreed in writing beforehand with the Council's Environmental Health Service.

Regards,
Robin Fraser
Environmental Health Officer
Highland Council, 38 Harbour Road, Inverness, IV1 1UF
Telephone: 07879661365

Andrew Sanger

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