

28 November 2025

Attention: Knowsley Council

SLR Project No.: 402.V08525.00024

RE: Planning Application 25/00228/FUL Land North of Cut Lane, Kirkby

Background

SLR has received the following feedback from the Local Authority(LA). The LA's comments are highited in *italic bold*, with SLR's response below.

“Under BS 4142, in which the noise assessment for the site is based, the predicted +6 dB exceedance clearly indicates an adverse impact.

Environmental Health do not believe that the contextual arguments presented by SLR constitute valid grounds to dismiss the predicted outcome. Given the quiet rural context, night-time operation, and proximity of receptors, the risk of audibility, complaint, and potential statutory nuisance remains credible.

Reference to BS 8233 is not relevant within the BS 4142 framework. BS 8233 looks at general environmental noise, such as road traffic and internal comfort levels, not the assessment of distinct industrial noise.

We do not agree with the reliance on the 1.3 dB increase argument, we do not believe the method used to derive this figure is an appropriate measure under BS 4142. The ear can detect contrast in character and steadiness of sound, not only changes in the overall LAeq, and BS 4142 assesses the rating level relative to the background to capture this perceptibility. Therefore, in a quiet night-time environment, even a small increase in total LAeq, such as a steady mechanical noise 6 dB above background, could be distinctly noticeable.

Given the development, as assessed, is likely to result in at least an adverse impact under BS 4142 and no further mitigation can be put in place, it may be that the site is not suitable for such a development, therefore we object to the application.

We do not agree with accepting a proposed condition ‘that would limit the rating level from the Site to no more than 5dBA above the baseline background sound level’.”

I will await your response to those comments once you have consulted with your noise consultants”.

In response to the above Pivot EDF has looked to re-design the layout of the Site so that the MVS units are shielded within the site by the BESS Units. The eastern barrier has also been removed as this fence was not affording any protection and was causing reflected sound to elevate noise levels to the west.

The results for the re-design at night are shown in Table A below. The proposed vegetation to the west has also been included.

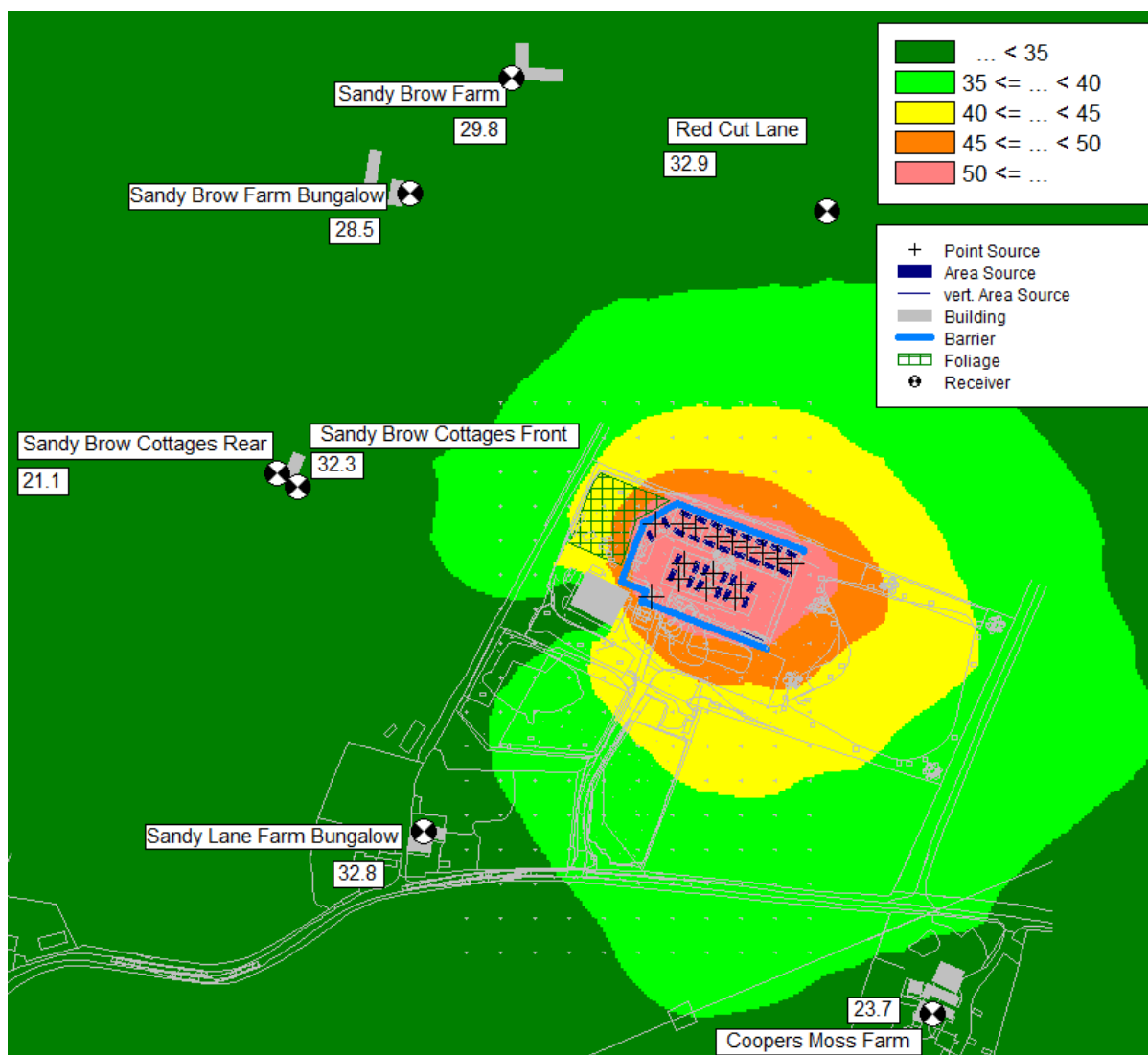
For information, at the most affected receptor, Sandy Brow Cottages, both the façade facing, and the façade facing away, have been included in the assessment. It is assumed that both facades may have bedrooms.

Red Cut Lane is included in Figure A but it has not been included in the assessment as upon review of the land use at this parcel of land, there is no residential occupation identified.

Table A: BS4142 Results at Night - dBA

NSR	Period	Specific	Predicted Rating Level, $L_{Ar,Tr}$ (dB)	Representative $L_{A90,15min}$, dB	Difference
Coopers Moss Farm	Night	24	27	34	-7
Sandy Lane Farm Bungalow	Night	33	36	34	+2
Sandy Brow Cottages Front	Night	32	35	31	+4
Sandy Brow Cottages Rear	Night	21	24	31	-7
Sandy Brow Farm	Night	30	33	31	+2
Sandy Brow Farm Bungalow	Night	29	32	31	+1





This re-design has enabled a 2dBA reduction at the most effected receptor Sandy Brow Cottages (compared to the previous layout). This has resulted in a rating level of no more than 35dBA.

This low rating level is significant as numerous studies by Moorhouse, Berry, Flindell, etc. for the Health Protection Agency and for Defra (referenced within the Further Reading Section of BS 4142) and supported by the recent Association of Noise Consultants Working Group report on BS4142 application, conclude that impacts at rating levels below 35 dB are unlikely.

Furthermore, the impact at Sandy Brow Cottages at night must be considered in context that the property has rear facing rooms that may be bedrooms. At the rear of the property, the rating level is 7dBA below the baseline background sound level.

The low rating level at the front of the property, and the rating level significantly below the baseline background sound level to the rear, support the view that the impact at night is low and acceptable.

As a final comment it must also be acknowledged that the assessments to date have been based on a specific supplier. There are other suppliers in the business who could have quieter equipment (either now or in the future). Consequently, the noise levels presented to date may be considered a worse case.



Closure

I trust this letter addresses the Council's concerns but please do get in touch if further information is required.

Regards,

SLR Consulting Limited

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