

Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)
DECC Consultation Document - November 2009

This review has been prepared on behalf of the Institute of Acoustics (IOA) in response to the invitation to comment on the Department of Energy and Climate Change's Draft National Policy Statement for Renewable Energy Infrastructure (EN-3) dated November 2009.

The Institute of Acoustics

The IOA is the leading professional body in the United Kingdom concerned with acoustics, noise and vibration and is active in research, educational, environmental and industrial organisations. The Institute is a nominated body of the Engineering Council, a member of the International Institute of Noise Control Engineering and the International Commission on Acoustics and a founding member of the European Acoustics Association. Members of the IOA are active in the development of UK, European and International Standards.

The IOA also gives support to the development of legislation and policy in the various disciplines in the field of acoustics and its response to the consultation document is based on this role. The IOA, however, represents a wide range of members and disciplines in acoustics and the comments presented here are the consensus view of the Environmental Noise Group, which is formed by members who specialise in environmental noise issues as acoustic consultants, local authority officers and academics. The response has been developed by the Institute's Environmental Noise Committee and subsequently passed to members of the IOA Executive for approval prior to submission.

Summary

The Institute of Acoustics (IoA) regards the draft NPS as a welcome statement of intent and broadly agrees with the content of the document.

Our understanding of the effects of environmental noise is improving rapidly, but it remains less than definitive in some areas, and existing standards and guidance can sometimes be applied outside their intended scope. The institute would like to see a clear separation between policy and technical advice in the NPS and suggests that the few references to specific standards and guidance on noise measurement, interpretive analysis and assessment are withdrawn from the document. Instead the NPS should make plain what the IPC policy is in regard to noise and direct those preparing information for a scheme to fully justify their choice of standards and guidance on noise measurement, interpretive analysis and assessment in the context of the specific noise sources, the nature and characteristics of the locality, and the likely impacts of the noise.

The existing guidance on the measurement and assessment of wind farm noise, ETSU-R-97, is now well past the date that it was due for review; and protracted debate about its value and the status of ad-hoc updates leads to many schemes being delayed. To move the debate on, the IoA would like to see that the

IPC press for a review of ETSU guidance as a priority and, as an interim, the NPS should formally adopt the update to ETSU-R-97 as described in the article in the March/April 2009 edition of the Institute of Acoustics Bulletin.

Specific Comments

2.6.90 – Offshore wind farms

Section 2.6.92 and 2.6.93 provide additional advice in regard to impacts of noise on marine mammals and fish.

The IoA regards this advice as welcome, but we are cautious that this is a rapidly emerging field, starting from a low knowledge base, consequently current best practice may have moved on from the contents of the draft NPS by the time it is published or implemented. This means that it may be prudent to refrain from incorporating specific technical advice in the NPS and instead restrict the document to policy objectives. Technical advice could then be provided via supplementary appendices or other routes.

2.7 – Onshore wind farms

Section 2.7.60 to 2.7.71 discusses on-shore wind farm noise impacts in detail. In short, these parts of the document can be summarised as meaning that the renewables NPS restates the recommendation in PPS 22 that ETSU-R-97 continues to be endorsed as the appropriate measure for the assessment and rating of noise from wind turbines. For example, it states *‘The applicant’s assessment of noise from the operation of the wind turbines should use ETSU-R- 97 in accordance with latest industry good practice which should reflect any updated guidance issued in relation to ETSU-R-97 and accepted by Government’*.

Those members of the IoA who are engaged in the assessment of wind farm noise are aware that the use of ETSU-R-97 is routinely criticised by objectors and at Public Inquiries as not being the most up to date guidance, particularly in regard to alleged deficiencies with the way it handles wind shear effects on noise from taller modern turbines, amplitude modulation of wind farm noise and the recommended night time noise limits. Whilst many of these criticisms appear to have some merit; they do not strengthen through repetition from one scheme to another, but they have to be addressed each time they are raised. Moreover, practitioners continue to use and Planning Inspectors repeatedly ratify ETSU-R-97, although planning conditions are getting more onerous and some Planning Inspectors have expressed clear reservations. ETSU-R-97 was meant to be reviewed two years after its initial publication in the mid 1990s, but a substantive review hasn’t happened. The absence of a review arguably undermines the guidance as some of the more outlandish and unfounded claims made against wind farm noise could be stymied by a review, which would strengthen the guidance by ratifying those parts that remain well founded and revising any sections that need update. Arguably, there isn’t a need for a root and branch review of the ETSU-R-97 guidance, although formal ”refreshment” of the advice would help clarify the situation and speed up decision making (which is a primary objective of the PA’08 and the IPC system) which can become bogged down in lengthy debate about noise assessment methodologies and the alleged deficiencies of ETSU guidance. Moreover, there have been ad-hoc updates of ETSU e.g. the Institute of Acoustics Bulletin March/April 2009, which addresses many of the recently raised concerns and has been accepted by Inspectors at recent Public Inquiries as good practice, despite not being formally approved by the Government.

Institute of Acoustics

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Consequently, the IoA suggests that the IPC should press for a review of ETSU, and as an interim the NPS should formally adopt the update as described in the article in the March/April 2009 edition of the Institute of Acoustics Bulletin as “*latest industry good practice*”.