



## The Institute of Acoustics

### Response to Consultation on streamlining infrastructure planning

#### Introduction

The Institute of Acoustics (IOA) is the UK's professional body for those working in acoustics, sound, noise and vibration. The IOA has some 3000 members from diverse backgrounds, with engineers, scientists, educators, lawyers, occupational hygienists, architects and environmental health practitioners among their number. This multidisciplinary culture provides a productive environment for cross-fertilisation of ideas and initiatives. The range of interests of members within the world of acoustics is equally wide, embracing such aspects as aerodynamics, architectural acoustics, building acoustics, electroacoustics, engineering dynamics, noise and vibration, hearing, speech, underwater acoustics, together with a variety of environmental aspects.

Members of the IOA regularly carry out noise impact assessments for wind turbine / farm developments, either for developers, objector groups, or decision-makers as stakeholders to the planning process. They also contribute significantly to international standards pertaining to wind turbine/farm noise. The IOA also has a long history of providing support to members for the application of the ETSU-R-97 methodology, having worked with Government to produce good practice guidance in 2013, and more recently in 2016 to produce the IOA rating method for the quantification and assessment of amplitude modulation (AM) in wind turbine noise.

Often in collaboration with other professional and trade bodies, such as the Chartered Institute of Environmental Health and the Association of Noise Consultants, the IOA has published a number of relevant guidance documents on noise from wind turbines:

- A Good Practice Guide to the Application of ETSU-R-97 for the assessment and rating of wind turbine noise, 2013 (IOAGPG) - Endorsed by Government as good practice guidance
- A series of six Supplementary Guidance Notes to the IOAGPG, 2014
- AMWG Final Report, 2016 – Sets out the IOA AM Metric

These documents can be found on the IOA website at: <https://www.ioa.org.uk/publications/wind-turbine-noise>.

Any proposed changes to the planning process dealing with the noise and vibration impact may affect the work of our membership both as consultants assisting developers with their planning applications and as regulators evaluating proposals.

#### Background

The Government are consulting on potential measures to streamline the infrastructure planning process. It has published a number of key proposals that support the application process for development consent under the Planning Act 2008. It has also sought views on the removal of statutory pre-application requirements for onshore wind projects under the Town and Country Planning Act 1990 guidance. It is this latter part that this response is focused on in answer to question 48.

The IOA is delighted to provide comments on the proposed changes where it is covered by the expertise and experience of our membership.

## Responses

### **Q48: Do you agree that pre-application consultation requirements under the Town and Country Planning Act for onshore wind developments should be removed? Please give reasons.**

Consultation for a proposed wind farm scheme including all interested parties is considered to be a vital part of the application process. The IOAGPG, endorsed as good practice for use with ETSU-R-97 for all windfarms above 50 kW, includes requirements for consultation at various points in the noise assessment process. This engagement helps to ensure noise impacts are adequately assessed.

The requirement for pre-application consultation in England under the Town and Country Planning Act 1990 for wind farm schemes is an anomaly against other technologies and is out of step with recent policy changes. However, the need to ensure an appropriate level of consultation should be mandatory, whether undertaken during pre-application or during the application. This could be provided through encouragement in the National Planning Policy Framework (NPPF) and through good practice guidance.

## Conclusion

If officials would like to explore further any of the points raised, relevant members of the Institute would be delighted to meet with them.

The response has been prepared by the Institute's Renewable Energy Advisory Group and approved through delegated authority by its Governing Council.

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