



## **The Institute of Acoustics Response to the Proposed Reforms to the Energy National Policy Statements (NPS)**

### **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.

Many members of the IOA regularly carry out noise impact assessments that contribute to the planning process in England and Wales. Therefore, any proposed changes to the NPS could directly affect the work of our membership both as consultants assisting developers with their planning applications and as regulators evaluating proposals.

### **Background**

The assessment of the potential noise impact of any development proposal has been an integral part of the UK planning system for at least 50 years. The reason is, of course, that exposure to noise can cause adverse health effects in the form of annoyance and sleep disturbance. It is also now known that long term exposure to environmental noise can cause direct health effects such as cardiovascular disease. The report from the House of Lords Science and Technology Committee, published in 2023, recognised these effects.<sup>1</sup> Therefore, it is essential that the planning process requires that noise is properly managed.

### **General**

The Government's policy for managing noise is set out in the Noise Policy Statement for England (NPSE), which was published in 2010 under the previous Labour administration. It provides an excellent over-arching policy under which detailed noise management policies for specific areas of activity can be developed. The IOA is delighted that there are no proposals to change the main noise management policies within the NPS (found in EN1 section 5.12) and that there is clear reference to the NPSE. This continuity is extremely helpful in enabling practitioners to address the issue of noise management efficiently and effectively.

### **Response to Specific Proposed Reforms**

#### **3. Do you have comments or amendments on any aspects of the new guidance for onshore wind?**

On the whole, the new sections on onshore wind are clear and helpful. There are a few minor points:

- Paragraphs 2.12.99 and 2.12.101: reference section 5.11 of EN-1, which we believe should be to section 5.12 (Noise and Vibration)
- Paragraph 2.12.164: makes reference to "*ground-transmitted low-frequency noise from wind turbines*". We believe that this should refer to "*ground-transmitted vibration, infrasound nor low-frequency noise from wind turbines*".

---

<sup>1</sup> <https://committees.parliament.uk/publications/40937/documents/199438/default/>



- New Footnote 116 provides the ability for the Government to update ETSU-R-97 in the future if policy needs amending, which is a pragmatic solution to future proofing the document.
- New Footnote 118 continues to support ‘*A good practice guide to the application of ETSU-R-97 for the assessment and rating of wind turbine noise by the Institute of Acoustics (2013)*’ as recognised government guidance, which is welcomed. Can we suggest that the same flexibility as that proposed for ETSU-R-97 is provided for the IOA guidance as well? A suitable clause could be “*Such as A good practice guide to the application of ETSU-R-97 for the assessment and rating of wind turbine noise by the Institute of Acoustics (2013) or any successor or supplementary guidance to it endorsed or published by the Institute of Acoustics - <https://www.ioa.org.uk/publications/windturbine-noise>.*” We would also note that the 2013 version was approved by Government, and consideration should be given as to whether updated versions should also be approved by Government.

The increase of the threshold to 100MW for wind turbine schemes to be captured in the NSIP regime seems a pragmatic change from the previous 50MW threshold, given the advances in wind turbine sizes and output currently available.

#### **9. Do you have any comments on any aspect of the draft energy NPSs or their associated documents not covered by the previous questions?**

On the whole, the new sections on the draft energy NPS are clear and helpful. There are a few minor points:

- Paragraph 5.10.22 of EN-1 refers to “...*the landscape and visual effects of noise...*”. We suggest this should be amended or ‘noise’ removed.
- Paragraph 5.12.3 of EN-1 references The Welsh Government’s previous Noise and Soundscape Action Plan 2018-2023, which is now out of date and has been superseded. This Paragraph should be amended accordingly.
- Paragraph 5.12.9 of EN-1 makes reference to BS 8233 in assessing operational noise whereas this standard currently scopes out its use for assessing changes in the external noise levels to occupants of an existing building. Given that proposed changes to BS 8233 will shortly be subject to consultation, the continued relevance of this standard, and its amended scope, should be reviewed.
- In the proposed NPS EN3, Solar PV, several sections reference “construction including traffic and transport noise and vibration”: this was already the case in previous draft of the NPS but the reference here to noise is not totally clear. There are other impacts that can arise in terms of construction noise (piling) and operational noise (substations, inverters in some cases or battery storage) that may require consideration, although it may be that these are considered to be covered by the general requirements of NPS EN-1 and EN-5. Perhaps a footnote could be added to include a short list of the other sources of noise (as indicated above) that the applicants may have to consider
- In EN5, Footnote 30 refers to the noise section in EN1 as 5.11, but we believe it should be 5.12.



## Conclusion

In summary, the proposed changes to the NPSs look to promote good practice in the assessment of noise and vibration, with the additions making a clear contribution where additional source specific requirements are provided.

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

This response has been prepared by members of the Institute who are experienced practitioners in this area. The response has been approved by the Institute's Governing Council.

Institute of Acoustics,  
Silbury Court,  
406 Silbury Boulevard,  
Milton Keynes,  
MK9 2AF  
United Kingdom

Tel: +44 (0) 300 999 9675

Email: [ioa@ioa.org.uk](mailto:ioa@ioa.org.uk)

May 2025