

Response ID ANON-SFAA-ST5R-9

Submitted to Planning for New Energy Infrastructure | Draft National Policy Statements for energy infrastructure
Submitted on 2021-11-29 11:04:12

About you

What is your name?

Name:
Stephen Turner

What is your email address?

Email:
president@ioa.org.uk

In what capacity are you responding?

On behalf of a non-governmental organisation

If you are responding on behalf of an organisation please tell us who:

Organisation name:
Institute of Acoustics

If you are responding on behalf of a member organisation, please make it clear who the organisation represents and, where applicable, how you assembled the views of members. :

The Institute of Acoustics (IOA) is the professional body for those working in the field of acoustics and noise management. Our members include consultants, academics and regulators. Our activities include working for the building industry, developers and local authorities in all matters associated with sound and noise management in the built and natural environment. This response has been compiled by members of the Institute.

What sector does your organisation work in?

Please write your response here:
Acoustics and noise management

What is the principle area of activity for your organisation?

Please write your response here:
Acoustics and noise management across all sectors

What is your role within your organisation?

Your role in organisation:
President elect

Are you happy for your response to be published?

Yes

Would you be happy for us to contact you for further information if required? If Yes, what is the best way to contact you?

Yes

Please confirm your preferred way of contact. :
president@ioa.org.uk

Draft EN-1 | Overarching Energy NPS

1a Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure on the government's energy and climate policy (Part 2)?

Not Answered

Please expand on your response here:

no view - we are commenting only on matters relating to acoustics

1b Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure on the need and urgency for certain types of infrastructure (Part 3)?

Not Answered

Please expand your response here:

no view - we are commenting only on matters relating to acoustics

1c Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure to inform decision making?

Not Answered

Please expand your response here:

no view - we are commenting only on matters relating to acoustics

1d Does the draft Overarching Energy NPS (EN-1) provide suitable information to those engaged in the process for development consent (e.g. Secretary of State, the Planning Inspectorate, applicants) for nationally significant energy infrastructure to inform examinations?

Not Answered

Please expand on your response here:

no view - we are commenting only on matters relating to acoustics

2 Do you agree with the amendments made to EN-1 Part 4 on assessment principles, including new guidance on the marine environment, and biodiversity and net gain?

Yes

Please expand your response here:

We welcome the inclusion of guidance on the marine environment, and the specific reference to noise and vibration impacts at section 4.4.2., given our membership includes specialists in underwater acoustics.

3 Do you agree with the amendments made to EN-1 Part 5 on the generic impacts of new energy infrastructure?

No

Please expand your response here:

The continued inclusion of noise and vibration remains essential given the recognised impacts of noise on human health of humans and the wider environment, so this is welcomed.

Having said that, it is extremely helpful in the implementation of noise management if the language used is precisely consistent across all planning policy and guidance. In the text of the original NPS, the absence of the phrase "in the context of Government policy on sustainable development" in clause 5.2.10, meant that the sentiment did not exactly align with the Noise Policy Statement for England (NPSE) or some other NPSs, such as The National Policy Statement for National Networks 2014, (paragraph 5.195) or the Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England, 2018 at paragraph 5.68. Furthermore, the phrase "through the effective management and control of noise" applies to all three bullet points (as shown in the NPSE) and not just the third bullet

We would, therefore, suggest the following wording for clause 5.2.10 to align the policy tests precisely with the NPSE and those other NPSs:

The Secretary of State should not grant development consent unless it is satisfied that the proposals will meet the following aims, through the effective management and control of noise in the context of Government policy on sustainable development:

- avoid significant adverse impacts on health and quality of life from noise
- mitigate and minimise other adverse impacts on health and quality of life from noise
- where possible, contribute to improvements to health and quality of life

For clause 5.11.2 on green space, the wording needs amending to describe more accurately the contribution green space can make to noise management. While research shows green space can absorb some noise, reducing noise levels using green space is complex – see, for example, the EU

Hosanna project hosanna_tra_jf_final.ppt (bartvanderaa.com). We believe simply stating that green space can “absorb noise” raises expectations that, for example, planting some trees or a hedge are a panacea for noise reduction. This is not the case.

It would be better to say – “can contribute to health, wellbeing, biodiversity recovery, absorb surface water, cleanse pollutants, can contribute to a small extent to noise mitigation and reduce high temperatures.”

4 Do you have any other comments on the amendments to EN-1?

Please write your response here:

no further comment

Draft EN-2 | Natural Gas Generating Infrastructure

5 Do you agree that the amendments to EN-2 (in combination with EN-1) provide clear planning policy to support the government’s position on the use of fossil fuels in electricity generation and the phase out of coal and large-scale oil?

Not Answered

Please expand your response here:

6 Do you agree with the way the amended EN-2 deals with the emerging potential for the use of low carbon hydrogen in electricity generation?

Not Answered

Please expand your response here:

7 Do you have any other comments on the amendments to EN-2?

Please write your response here:

Draft EN-3 | Renewable Energy Infrastructure

8 Do you agree that the amendments to EN-3 (in combination with EN-1) provide clear planning policy to support the government’s position on renewable energy infrastructure?

Not Answered

Please expand your response here:

no view - we are commenting only on matters relating to acoustics

9 Do you agree with the amendments made to EN-3 guidance on offshore wind?

Yes

Please expand your response here:

We welcome the addition at 2.26 that review of up-to-date research should be undertaken and all potential mitigation options presented when considering impacts, on fish of offshore wind, including acoustic impacts.

We also welcome clause 2.28 stating that a Review of up-to-date research should be undertaken and all potential mitigation options to protect marine mammals.

10 Do you agree with the new guidance added to EN-3 on pumped hydro storage?

Yes

Please expand your response here:

We are pleased to see the potential for noise impacts is fully recognised here.

11 Do you agree with the new guidance added to EN-3 on solar PV?

Not Answered

Please expand your response here:

12 Do you agree with the new guidance added to EN-3 on tidal stream energy?

Yes

Please expand your response here:

We are pleased to see acknowledgement that noise is a potential issue both from installation and infrastructure and for tidal arrays.

13 What further changes do you think might be necessary to EN-3 and the nationally significant infrastructure projects (NSIP) regime more broadly in the longer term to deliver our de-carbonisation and other objectives including to deliver the scale of deployment needed for Carbon Budget 6 and Net Zero?

Please write your response here:

14 Do you have any other comments on the amendments to EN-3?

Please write your response here:

Yes – we would like to see wording at 2.15.4 amended. In this draft it reads “2.15.4 Noise from features including sorting and transport of material during operation of biomass or EfW generating stations is unavoidable. Similarly, noise from apparatus external to the main generating station may be unavoidable. This can be mitigated through careful plant selection.”

The word ‘unavoidable’ has a particular meaning in noise policy. Rather than using ‘unavoidable’ it would be better simply to state that noise from these sources is ‘inevitable’.

Draft EN-4 | Gas Supply Infrastructure and Gas and Oil Pipelines

15 Do you agree that the amendments to EN-4 (in combination with EN-1) provide clear planning policy to support the government’s position on gas supply infrastructure and gas and oil pipelines?

Yes

Please expand your response here:

We are content that there is considerable acknowledgement that there are potential noise impacts.

16 Do you agree with the way the amended EN-4 deals with the emerging need for low carbon hydrogen?

Not Answered

Please expand your response here:

17 Do you have any other comments on the amendments to EN-4?

Please write your response here:

Draft EN-5 | Electricity Networks Infrastructure

18 Do you agree that the amendments to EN-5 (in combination with EN-1) provide clear planning policy to support the government’s position on electricity networks infrastructure?

Yes

Please expand your response here:

We are satisfied that good account has been taken of potential acoustic issues in 2.12.10

19 Do you agree with the new guidance added to EN-5 dealing with land rights and interests?

Not Answered

Please expand your response here:

20 Do you agree with the new guidance added to EN-5 incentivising more coordination in the design and delivery of electricity transmission infrastructure associated with offshore wind?

Not Answered

Please expand your response here:

21 Do you agree with the amendments made to EN-5 to reflect priorities to minimise the landscape and visual impacts of new electricity network infrastructure including recognition of the ‘Horlock Rules’ and undergrounding in National Parks and Areas of Outstanding Natural

Beauty?

Not Answered

Please expand your response here:

22 Do you have any other comments on the amendments to EN-5?

Please write your response here:

Assessment of Sustainability EN-1 to 5

23a Do you have any comments on the AoS findings for the draft Overarching NPS for Energy (EN-1)?

Please write your response here:

23b Do you have any comments on the AoS findings for the draft NPS for Natural Gas Generating Infrastructure (EN-2)?

Please write your response here:

23c Do you have any comments on the AoS findings for the draft NPS for Renewable Energy Infrastructure (EN-3)?

Please write your response here:

23d Do you have any comments on the AoS findings for the draft NPS for Gas Supply Infrastructure and Gas and Oil Pipelines (EN-4)?

Please write your response here:

23d Do you have any comments on the AoS findings for the draft NPS for Electricity Networks Infrastructure (EN-5)?

Please write your response here: