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Lord Hunt of Kings Heath
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Dear Lord Hunt

Assessing Potential Noise Impacts from wind Turbines

Thank you for your reply to our letter of 21st August dated 1st October. We are very concerned that your letter fails properly to answer points we raise. We feel compelled to reiterate these to reinforce our position, namely that ETSU – R- 97 is no longer an appropriate rating and assessment method for the potential noise impact from wind turbines.

We restate our view that we support the Government's renewable energy targets and endorse the deployment of wind farms as an essential part of the UK energy mix. Notwithstanding we strongly believe this deployment would be more sustained and successful if undertaken using the best information currently available both on potential generating capacity and on potential impacts on health and local environmental quality. In this context we do not consider the 'best information currently available' is being used now, in assessing potential noise impacts. ETSU-R-97 is now more than 13 years old and both wind farm technology and experience in environmental effects has advanced since its introduction. We believe that local opposition to wind turbines can only grow if people feel that potential impacts are being inadequately represented, or even misrepresented. If disagreements over the extent and nature of potential impacts can be reduced, decision-making can focus on the balance between local and wider interests.

Our basis for seeking a review of ETSU-R-97 is as follows:

- ETSU-R-97 was drafted with input from specialists in acoustics in the light of 'best available guidance at the time' and in itself anticipated that it would need to be revised within two years.
- ETSU-R-97 has now been 'adapted' in an ad hoc way¹ by practising acousticians (some of whom were involved in drafting the original guidance) to enable its continued use - we believe this alone demonstrates that in its original form it is no longer fit for purpose and requires revision.

- The existence of what is in effect an alternative version of ETSU-R-97 – the so called common ground guidance drawn up by noise specialists working in the field, supports this view. Use of this in practice, diverging as it does from the original guidance accepted by government, could potentially lead to further confusion and delay, particularly in any planning inquiries.
- The draft National Policy Statement for Renewables² states that “*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.” We contend that updated guidance should be issued and accepted by Government as soon as is practically possible.
- We do not agree that there is no evidence that Amplitude Modulation is a result of turbine size.^{2,3}
- Currently there are limited, if any, provisions in place for remedy for any impacts on neighbours of wind farms (foreseen or unforeseen). We accept that some impacts may be unavoidable as an industrial infrastructure is developed to meet future energy needs within climate change constraints – and where this undesirable situation arises, a compensatory mechanism should be in place for neighbours who suffer significant adverse effects. This expresses the ‘polluter pays’ principle, which we understand is Government policy.
- Finally, we quote Peter Luff MP, who in presenting his Private Members’ Bill in the Commons on 3rd November⁵ stated
“There are different concerns about wind farms. Noise, especially low-frequency noise, the flicker effect and the resulting health implications are just some of those concerns. I have been impressed by the personal accounts of such concerns in many of the hundreds of e-mails that I have received. However, although the science may not yet be settled on those matters, the visual intrusion of wind turbines is a matter of objective fact.”

In summary, in view of the obvious concerns about noise impacts, would you not agree that a further effort to bring the science to a more settled position, to the best of our current ability, and subject to review as further knowledge is developed, would enable the potential impacts of wind turbines to be more properly and effectively considered? The current situation, which is causing confusion for local authority environmental health and planning officers, developers and anyone living or working in the vicinity of wind turbines is, we believe, causing unnecessary and costly delay.

We look forward to your comments

With kind regards



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 Environmental Protection UK

Cc Rt hon Hilary Benn, Secretary of State for Environment, Food and Rural Affairs

Cc Rt hon John Denham MP, Secretary of State for Communities and Local Government

1. Prediction and Assessment of Wind Turbine Noise, Bowdler et al, Acoustics Bulletin, March/April
2. Draft National Policy Statement for Renewable Energy Infrastructure (EN-3)
3. Wind Shear, Andrew Bullmore, IOA Wind Turbine Noise Conference, Jan 2008
4. Large Wind Turbines – Are they too big for ETSU – R – 97 – Mike Stigwood, IOA Wind Turbine Noise Conference, Jan 2008
5. Onshore Wind Turbines (Proximity of Habitation)
<http://www.publications.parliament.uk/pa/cm200809/cmhansrd/cm091103/debtext/91103-0009.htm#091103125000001>