

20/12/2019

Holding response setting out concerns relating to the noise section of the Draft Revised Wind Energy Development Guidelines

This initial response has been produced by a group of acousticians as listed at the end of this document ('the group') in response to the release of the Draft Revised Wind Energy Development Guidelines ('the draft guidelines') on 12th December 2019. The group is made up of acousticians who act for wind farm developers, Councils, Government bodies and residents groups. It contains several of the authors / contributors to ETSU-R-97, the Institute of Acoustics Good Practice Guide ('the IOA GPG') and the Institute of Acoustics Amplitude Modulation Working Group, which are all referenced extensively in the draft guidelines.

All members of the group are members of the Institute of Acoustics and are either based in Ireland or have worked on wind farm projects in Ireland.

Wind farm noise is obviously a very technical subject and having reviewed the draft document section on noise, we are of the opinion that the guidance contains a number of technical errors, ambiguities and inconsistencies and that it requires further detailed review and amendment. In particular we are concerned that the lack of clarity and some of the inconsistencies in parts of the guidelines could, in themselves, lead to future disputes or discussions, which would go against the aim of the document.

We wish to be clear that the setting of suitable noise limits is a matter for Government policy, and it is only aspects of technical accuracy and clarity with which we, as a group, are concerned.

We are very concerned about the consultation timescales outlined in the document and would note that this is insufficient to allow a formal response to be collated by the Institute of Acoustics (IOA). We would therefore request that an extension is allowed to enable the IOA to undertake its own consultation with its members. Notwithstanding the request for an extension to the consultation timescales, the group will seek to provide feedback within the existing 10 week consultation period and are keen to work with Department of Housing, Planning and Local Government (DHPLG) / Department of Communications, Climate Action and Environment (DCCAIE) to ensure that the final guidelines are clear and robust.

Given the technical nature of the issues raised we believe that interactive consultation is required and would like to request that a meeting / workshop is arranged between representatives of the group, the Irish Branch of the IOA, Local Authority representatives in the IOA, the relevant Government departments and the authors of the draft guidance.

Key areas that require further consideration include:

- Baseline noise assessment;
- Consideration of World Health Organisation guidelines;
- Application of noise limits;
- Cumulative assessment;
- Planning conditions and the way these should account for cumulative effects;
- Corrections to account for noise character; and
- Compliance monitoring.

We would welcome the opportunity to discuss this further with the representatives of DHPLG, DCCAIE and authors of the noise section. The group are aiming to produce a consolidated set of more detailed technical feedback by the 27th of January and would be grateful if you could confirm whether you would be able to meet with representatives of the group after this date.

20/12/2019

This document has been agreed by the following individuals. Please note that the views expressed in this document are those of the individuals and not necessarily the organisations that they work for:

James Mackay, MIOA (TNEI).

Peer Reviewer of IoA GPG and GPG Supplementary Guidance Note Author.

Jim Singleton, MIOA (TNEI).

Michael Reid, MIOA (Arcus Consultancy Services Ltd).

Matthew Cand, MIOA (Hoare Lea).

Author of the IOA GPG and IOA AM Guidance documents.

Dr John Mahon, MIOA (Fehily Timoney & Company).

Dr Andy McKenzie, FIOA (Hayes Mckenzie Partnership).

Peer Reviewer of IoA GPG and GPG Supplementary Guidance Note Author.

Diarmuid Keaney, MIOA (ICAN Acoustics).

Malcolm Hayes, MIOA (Hayes McKenzie Partnership).

Chair of IoA Wind Turbine Noise Working Group, Author of the IOA GPG and IOA AM Guidance documents, Author of ETSU-R-97.

Dr Simon Jennings, AMIOA (Limerick City and County Council).

Dick Bowdler, FIOA (Wind Farm Noise Consultant).

Organiser of Biennial Wind Turbine Noise Conferences.

Damian Kelly, MIOA (AWN Consulting Limited).

Vice Chair IoA Irish Branch.

Mark Jiggins, MIOA (Hoare Lea).

Author of ETSU-R-97.

Gavin Irvine, MIOA (Ion Acoustics).

Chair of IoA Amplitude Modulation Working Group, Peer Reviewer of IoA GPG.