

Lord Hunt of Kings Heath
Minister of State
DECC
1 Whitehall Place
London
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21st August 2009

Dear Lord Hunt

Thank you for taking the time to meet me recently. I felt the meeting was very useful in terms of raising a number of issues for discussion.

Specifically, I want to follow up on the point I raised about ETSU – R – 97, the guidance currently used for the assessment and rating of noise from wind farms. Published in September 1996, as the findings of the working group on Wind Turbine Noise, the guidance is way overdue for revision for a number of reasons:

- Drafted in the light of ‘the best information available at the time’, the report itself acknowledges that revision may be necessary – anticipating that the wind industry might take the initiative for a review – this has not proved the case
- Since the production of this guidance, turbine height and blade sizes have increased significantly, altering potential acoustic effects
- The Planning Act 2008 in its clause 158 confers statutory authority for any nuisance impacts of major infrastructure projects. With this effective immunity from complaint by any neighbours who may suffer noise impact in place it is absolutely crucial that guidance used for assessing the potential noise impact of wind farms is based on best available knowledge and on the machinery that is used in practice now, and is likely to be used in future
- ETSU-R-97 itself recommends it be reviewed in two years time. It is now 13 years old
- In the recently published HPA draft report ‘Environmental Health in the UK’, the Chairman acknowledges that “In the air pollution field (multiple causality) has led to a move away from defining ‘safe’ levels of exposure to pollutants and a move towards expressing results in terms of probabilities of occurrence of a specified effect at a specified level of exposure. It seems likely that such an approach is also applicable in the environmental noise field.”

In summary, turbines are now being built that are three times the height of those that were common when the guidance was first produced. The characteristics of wind change with height, as does its interaction with blades of different size, both of which can affect the level and type of resultant noise. There is now 13 years of further experience in the deployment of wind turbines to draw on, which should enable us to develop a renewable infrastructure that avoids undue impact on neighbours.

Environmental Protection UK are very much in support of the Government’s renewable energy targets, and fully understand and endorse the deployment of wind

farms as an essential part of the UK energy mix. However, we believe that this can and should be undertaken with full regard to the quality of the local environment and the protection of health and well-being. Basing critical planning decisions on such overtly outdated guidance will not achieve this. Therefore I would like to formally request that the ETSU –R-97 guidance is revised. Given the pending publication of a draft National Policy Statement for Renewables and the urgent need to develop our renewable capacity this revision must take place without delay.

I look forward to hearing from you shortly with confirmation that such a revision is to be approved.

With kind regards

Philip Mulligan
Chief Executive

cc Rt Hon Hilary Benn MO, Secretary of State for Environment, Food and Rural Affairs, DEFRA, Nobel House, 17 Smith Square, London, SW1P 3JR

cc Rt Hon John Denham MP, Secretary of State for Communities and Local Government, CLG, Eland House, Bressenden Place, London, SW1E 5PU