

SANDY KNOWE WIND FARM SECTION 36 APPLICATION

Revised Noise Assessment

October 2019

Appendix B – Supplementary
Correspondence with TNEI & ECU



Dear Stuart

In light of the concerns raised regarding the baseline datasets, you request that this is not used to set noise limits but instead that the limits are set based on the fixed minimum limits in ETSU-R-97.

The advice we received from ECU noise consultant (TNEI) noted that generally speaking, where background noise measurements are not available a simplified noise limit of 35 dB should be adopted. TNEI are of the opinion, given that the applicant did undertake baseline measurements, that baseline measurements have been undertaken for a number of other schemes in the area (noting that this has previously been used to determine the appropriate fixed minimum limits for consideration of cumulative noise) and given the extensive discussions between the ECU and the Applicant it would be reasonable for the ECU to agree this approach in this instance (use of fixed limits without consideration of background noise).

ECU are willing to accept this approach on the basis that sufficient information is provided to justify the 3 points from your email below highlighted in yellow. ECU would like to make it clear that this would not normally be an acceptable approach and has only been adopted following detailed consideration of the site specific information available for this application.

We would also highlight the following text from the IOA GPG which may be relevant too:

"3.2.5 It can be argued that assessing these factors do not represent an acoustic consideration but ultimately a planning consideration, and therefore are difficult for noise consultants to fully determine. However this is described as part of ETSU-R-97 and therefore represents a relevant consideration when determining applicable noise limits. Furthermore, it is necessary, as part of the EIA process to evaluate the noise impacts, which is arguably not fully possible without a complete determination of the ETSU-R-97 limits."

Simon Waddell email of 19 June 2019

ECU would raise concerns regarding the point in relation to predictions and derived limits that noted:

1. *"The applicable noise limits for Hare Hill + Hare Hill Extension were clarified by ITPE (see attached compliance report (Arcus) and review of planning documents (ACCON UK) for reference) The applicable limits are lower than the 45 dB Financially Involved limit, as they account for the contributions of the Sanquhar Community and originally-consented Sandy Knowe wind farms."*

This matter is being considered further by ECU noise consultant and we will be in touch in due course.

Kind regards

Chris



ITPENERGISED
Earth. Smart. Solutions

Registered Address:

7 Dundas Street

Edinburgh

EH3 6QG

+44 (0) 131 557 8325