

# REF

RENEWABLE ENERGY FOUNDATION

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Professor Bridget Shield  
President  
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By email and post

19 April 2013

Dear Professor Shield,

## **Re IoA Consultation on ETSU-R-97**

The Renewable Energy Foundation (REF) has been concerned for some years about the accuracy of the wind farm noise guidance, ETSU-R-97, and the standard of wind farm noise assessments carried out by members of the Institute of Acoustics. In an endeavour to increase the understanding of wind farm noise impacts we have written several information notes on controversial noise issues and made the raw data we used freely available.<sup>1</sup>

We have also contributed to the IoA Consultation on the ETSU-R-97 wind farm noise guidance.<sup>2</sup> However, we have only uncertain confidence in the outcome of the IoA consultation, not least because the draft consultation document itself contains a number of assertions that are not backed up by data in the public domain, so cannot be independently tested. We note that the IoA has a specific item in its Code of Conduct, which calls upon members to “ensure that primary data used in any publication or report are available in a form that would allow for independent scrutiny”. However, we are disappointed that acousticians working on wind industry noise issues routinely fail to comply with this edict.

We have observed over the years that significant progress in the understanding of wind farm impacts has been largely achieved by members of the public who have had to fight hard – often through the courts – to obtain from acousticians and developers the primary data necessary to quantify noise impacts. When such data is finally released, it has been routinely found that the claims made about the data do not stand up. We strongly believe that the IoA should be pushing for full disclosure of relevant data and not leaving this task to members of the public affected by wind farm developments.

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<sup>1</sup> <http://www.ref.org.uk/publications/242-the-den-brook-amplitude-modulation-noise-condition>;  
<http://www.ref.org.uk/publications/255-ioa-critique>; <http://www.ref.org.uk/publications/151-ref-publishes-data-on-wind-farm-noise-obtained-under-the-freedom-of-information-act>

<sup>2</sup> <http://www.ref.org.uk/publications/274-ref-consultation-response-to-ioa-on-etsu-r-97>

We believe it is indispensable that you ensure that the final IoA report on the ETSU-R-97 guidance contains no statements which cannot be independently verified by free access to raw data and that it is made plain to readers where such data can be obtained.

Where such data is genuinely not available, we believe that conservative and reasoned assumptions designed to ensure protection of neighbours' amenity may be made, as distinct from those to date where maximising wind farm output at the expense of neighbours' amenity is the driving force.

Furthermore, we note that the consultation process has not addressed providing corroborative data and we would suggest that another iteration of consultation is necessary to flesh out what data is necessary. We hope that you can intercede in this matter to ensure that the IoA report can be seen to be demonstrably fair and accurate.

I would be very grateful if you could let me know what if any steps you propose to take in relation to the matters described in this letter.

Yours sincerely,

A handwritten signature in black ink that reads "John Constable". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

John Constable.

Director

CC: Michael Fallon MP, Minister of State for Energy, DECC.  
The Rt Hon Owen Paterson MP, Secretary of State for DEFRA.