

Title of Report:	Consultation on proposed updates to technical guidance for the assessment of noise emissions from onshore wind turbines
Committee Report Submitted To:	Environmental Services Committee
Date of Meeting:	9th September 2025
For Decision or For Information	For Decision
To be discussed In Committee	No

Linkage to Council Strategy (2021-25)	
Strategic Theme	Healthy, Active and Engaged Communities
Outcome	Provide a consultation response
Lead Officer	Head of Health & Built Environment

Estimated Timescale for Completion	
Date to be Completed	N/A

Budgetary Considerations	
Cost of Proposal	N/A
Included in Current Year Estimates	N/A
Capital/Revenue	N/A
Code	N/A
Staffing Costs	N/A

Legal Considerations	
Input of Legal Services Required	NO
Legal Opinion Obtained	NO

Screening Requirements	Required for new or revised Policies, Plans, Strategies or Service Delivery Proposals.		
Section 75 Screening	Screening Completed:	N/A	Date:
	EQIA Required and Completed:	N/A	Date:
Rural Needs Assessment (RNA)	Screening Completed	N/A	Date:
	RNA Required and Completed:	N/A	Date:
Data Protection Impact	Screening Completed:	N/A	Date:

Assessment (DPIA)	DPIA Required and Completed:	N/A	Date:
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1.0 Purpose of Report

- 1.1 The purpose of this report is to provide a Causeway Coast and Glens Borough Council response to the consultation.

2.0 Background

- 2.1 The Department for Energy Security & Net Zero (DESNZ) has issued a consultation on proposed updates to technical guidance for the assessment of noise emissions from onshore wind turbines.
- 2.2 The existing guidance, The Assessment and Rating of Noise from Wind Farms ETSU-R-97, dates back to 1996. In 2023, a government commissioned independent scoping review indicated the guidance would benefit from an update.
- 2.3 The guidance provides guidelines for the control of wind turbine noise, such that wind farm neighbours receive a reasonable degree of protection without placing unreasonable restrictions on wind farm development.
- 2.4 Environmental Health Officers in Health & Built Environment utilise this guidance when consulted by the Planning Department on proposed wind turbine developments and in assessing noise from existing turbines.
- 2.5 The online survey form, Assessment and rating of wind turbine noise guidance proposed updates can be found at:

<https://energygovuk.citizenspace.com/energy-infrastructure-planning/assessment-rating-wind-turbine-noise>
- 2.6 The closing date for submission of responses was 29th August 2025.
- 2.7 Attached as Appendix 1 which was submitted as an officer response due to the short deadline to the consultation.
- 2.8 Due to submission time constraints, an Officer response was submitted on the Council's behalf by the deadline, subject to subsequent endorsement by the Environmental Services Committee and approval by the full Council.

3.0 Recommendation

It is recommended that Council endorses the response.

Causeway Coast and Glens Borough Council Response to

Department for Energy Security & Net Zero (DESNZ) Consultation on proposed updates to technical guidance for the assessment of noise emissions from onshore wind turbines

Closing date 29th August 2025

Q1. Do you agree with our proposed approach of using a single ‘limit’, which takes the minimum of the day and night limit at each wind speed and applies at all times?

Please explain your answer and provide supporting evidence.

Yes, agree that a single limit at each wind speed should apply at all times.

Taking the minimum of the day and night-time at each wind speed is a conservative approach.

In Northern Ireland, currently the approach to planning conditions is to include the predicted site-specific levels at receptors which must be complied with for both daytime and night-time.

It is noted that AM prevalence at night supports adopting the lower (more protective) of day/night limits.

Q2. Do you agree with our proposal to raise the lower value for the day-time noise limit range to 37 dB? Please explain your answer and provide supporting evidence.

The increase of the day-time noise limit from 35 dB to 37 dB (Lower Limiting Value (LLV)), could be interpreted as a modest increase. However, there are possible implications for residential amenity and potential levels of annoyance for residential receptors. For example, at lower wind speeds in quieter environments this increase could be likely to be more noticeable, and in complaint scenarios or statutory nuisance investigations could be material.

It is acknowledged that there needs to be a balance between the acceptable level of noise from wind energy developments and the delivery of renewable energy from wind. Council would advocate for the maximum generation potential whilst not exceeding limits.

Council considers that the evidence-based review which justifies the selection of 37 dB as Government’s chosen position should be presented. As it is noted that the 2023 WSP document did recommend that further evidence-based review was required on this matter.

Q3. If you do not agree with the proposed approach of using a single ‘limit’, what would you suggest as an alternative approach and why?

Please include discussion of the appropriate dB noise criteria for your suggested approach and provide supporting evidence.

Past wind energy developments in Northern Ireland were for many single wind turbines i.e. lower energy generation development. As an alternative approach, if it was an option to retain the 35 dB limit for single wind turbines and apply higher limit to wind farm developments or adopt a graduated approach for example 35dB for 2 turbines and less, up to 37dB for larger wind farms but subject to site-specific justification.

Q4. Do you think the updated guidance provides adequate advice for assessing and controlling the impact of Amplitude Modulation? Please explain your answer and provide supporting evidence.

Council supports the updated guidance, as currently ETSU-R-97 is not explicit regarding AM. So, referencing a methodology is an improvement. The wording of the conditions and the technical guidance notes referring to AM character correction is welcomed.

Q5. Do you agree with other technical updates to the 'Draft Assessment and Rating of Wind Turbine Noise Guidance'? Please explain your answer and provide supporting evidence.

Council broadly agrees with the technical updates.

It is noted that the proposed guidance states that when determining noise limits LLV the factors are to be prioritised according to generation capacity, which is change from ETSU where there was an interplay of factors when weighing up planning merit.

The example wording of planning conditions and associated technical notes are welcomed to promote consistency. It is questioned if consideration should be given to a condition which requires presentation to the local planning authority of a curtailment strategy if required for the wind farm to meet limits.

The current approach in Northern Ireland, to condition wind farms to site specific predicted levels at receptors when assessing cumulative impacts, means that one development does not take all the 'headroom', which would restrict other future developments.

Clarity on character penalty combination is appreciated.

Q6. Do you have any further comments on the proposed updates to the 'Draft Assessment and Rating of Wind Turbine Noise Guidance' that you wish to make Government aware of?

Please explain your answer and provide supporting evidence.

The increase in limit, may cause difficulties for applications where existing wind turbines are proposed to be repowered, particularly for those that had limited head room and were contentious (i.e. resident objections). The draft should include specific commentary on repowering and provide guidance.

It is noted that there is no definition of the 'reasonable degree of protection' within the document, e.g. it is not included in the glossary, this should be given explanation and justification within the document. Nor has the terms Noise Assessment Criteria or Site-Specific Noise Limits (SSNLs) been included. It is recommended that these definitions are provided.

It is considered that Figure 1 page 15 'diagram illustrating the determination of the noise assessment criteria' which shows the derivation of limits would benefit from some additional clarity, regarding the single limit, i.e. minimum numbers should be shown (37 dB if this value is agreed). Colour coding of the lines would assist readability.

It is considered that the wording of the first bullet point in section 4.4 and the associated footnote 8 are not very clear and would appear to offer an approach that Council would not agree with. It is however noted that in section 2.40 (and partially 4.3) assist with understanding (and confirming that selection of the SSNLs must be supported with justification). Council considers that the SSNL should follow the predicted levels and not the total criteria. Footnote 8

Appendix 1

outlining a 'blanket approach' of subtracting the minimum margin between the predicted operational noise level and the total level is a different approach.

Council would support evidence-based policy and guidance, that protects people's health and safeguards residential amenity.

It would be beneficial to include worked examples/case studies in the final guidance to aid Planning officers and Environmental Health teams.

Transitional Arrangements: The government should clearly define how the new guidance will be applied to current and pending planning applications, to avoid confusion or legal uncertainty. Ideally, applications submitted before the adoption of the new guidance should be permitted to follow the existing ETSU-R-97 framework

Training and Support for Local Authorities: The revised guidance introduces improved clarity, but implementation will still require technical expertise—particularly in assessing AM, interpreting cumulative impacts, and setting context-based noise limits. A dedicated training program or technical support mechanism would greatly assist in achieving a consistent approach