

Stakeholder comments

This document is prepared for stakeholders to provide comment regarding EPA stance as outlined in the Consultation response document. It is recommended that this document be used alongside the Consultation response document to allow stakeholders to provide further comments on topics.

General comments

Issue	EPA stance	Stakeholder comment
Difference of noise descriptors used for prediction ($L_{Aeq,10min}$) and compliance checking ($L_{90, 10min}$)	Not adopted, but may be considered in future reviews	
Clarification on the application of the new guidelines and how it would impact existing developments	Accepted. Wording currently under consideration.	
Clarification for enforcement, complaints management, etc	Not adopted, but may be considered in future reviews	
Ongoing real time acoustics monitoring of wind farms	Considered but not adopted	
Licensing of wind farms	Considered but not adopted	
External report auditing for: <ul style="list-style-type: none"> • Pre-construction modelling • Post-construction monitoring 	Considered but not adopted	
Compliance testing to be undertaken by an acoustics engineer chosen by community at the expense of the operator	Considered but not adopted	

Issue	EPA stance	Stakeholder comment
Changes to the recommended noise levels for receivers with agreements	Not adopted, but may be considered in future reviews	
Cumulative noise impact of all wind farms to meet criteria is impractical to achieve	Not adopted, but may be considered in future reviews	
Instead of limiting sound power levels of turbines to be installed during planning stages, require that a final acoustic assessment be undertaken with final choice turbine and layout before the construction phase begins.	Accepted. Wording currently under consideration.	
Expanding on alternative compliance checking methods in Section 4.5 of guidelines	Not adopted, but may be considered in future reviews	
Provide clarity that noise levels are to be measured externally	Accepted. Wording currently under consideration	
All raw acoustic and weather data measured for wind farm projects should be publicly available	Considered but not adopted	

Noise criteria

Issue	EPA stance	Stakeholder comment
Noise Criteria should be reduced from 40dB(A) to 35 dB(A) for areas not in rural living zones	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Separate day and night time assessments	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Reduce the background +5dB criteria to background +3dB criteria		
Removal of 'whichever is greater' term from noise criteria	Not adopted. Further information on this issue is provided below.	

Data collection methods

Issue	EPA stance	Stakeholder comment
Clarification for weather data collection technology when collecting data	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Clarification of number of different periods required for compliance checking		
Exclusion of microphone-location-specific (Local) wind speed data for 5 m/s	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Data should be excluded after rain periods for 24 hours		
Require a minimum number of non-host dwellings for background noise testing and distances to wind farms for background noise testing		

Data analysis methods

Issue	EPA stance	Stakeholder comment
Analysing up to wind speed with highest sound power level of a turbine sufficient. Analysing up to rated power wind speed not necessary.	Not adopted	
Using Day-Evening-Night levels (LDEN) for analysis	Not adopted	
Clarification of number of points for each wind speed bin	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Arithmetic averaging instead of logarithmic averaging for statistical noise measures such as LA90,10min.		
Finer resolution for wind speed bins in order to further align with the IEC Standard		
Data collected during complete stoppage of turbines should not be included in compliance assessment		
Change to background subtraction method (subtracting background noise as a function of local wind speed at microphone height) for compliance checking	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	

Propagation modelling

Issue	EPA stance	Stakeholder comment
Hard Ground Propagation too conservative	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Use of ISO9613-2 vs CONCAWE		
Adopting UK Institute of Acoustics <i>Good practice guide for propagation model</i> (2013)		

Amplitude modulation

Issue	EPA stance	Stakeholder comment
Provide clarity where amplitude modulation has been taken into account	Explanation provided below	
Penalty should be imposed for 'excessive' amplitude modulation	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
Adopting UK Institute of Acoustics <i>Assessment method for amplitude modulation assessments</i> (2016)		

Tonality

Issue	EPA Stance	Stakeholder Comment
Provide further clarification regarding the application of penalties for annoying noise characteristics such as tonality	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	
One third octave screening method should not be utilised for wind farm operations	Accepted, this method not considered as suitable screening method for wind farms.	
Further clarification regarding how IEC61400 is to be applied at the receiver	Further wording under consideration	

Low frequency

Issue	EPA stance	Stakeholder comment
Low frequency criteria be adopted into the wind farm guidelines	Not adopted, but may be considered in future reviews depending on developments in wind farm noise and international literature reviews	

Infrasound

Issue	EPA stance	Stakeholder comment
Infrasound criteria be adopted into the wind farm guidelines	Not adopted	

Vibration

Issue	EPA stance	Stakeholder comment
Vibration criteria be adopted into the wind farm guidelines	Not adopted	