

Detailed information requested to assist with complaints to the Ombudsman's office with respect of noise complaints to both South Cambs DC (SCDC) and Huntingdon DC (HDC) regarding noise emissions from Cotton Farm Wind Farm (CFWF).

Disclaimer. The information provided in this document is to be considered as E&EO. The information provided below is as accurate as possible but the complaint procedure to be sent to the Ombudsman's office has to be based on the personal experience of the individual and the council's response (if any) to the same individual's complaints.

Preamble.

1.1 The information and evidence in this document is supporting a citizen's complaint with respect to noise coming from the wind turbines at CFWF. It can be used and referred to as part of the complaint. See para 26 for details.

1.2 There are a number of internet links provided to specific documents allowing further research by the complainant and the Ombudsman. **It is recommended, first, to read the joint statement from HDC & SCDC copied in appendix 1, page 9 below, before continuing.**

1.3 The documentation and data recorded from the original planning application to build CFWF to the present day, is available.

1.4 This document is to be loaded on the village web site and can be referred to in any individual complainant. Please note it can be updated and modified in the light of further information.

History.

2.1 The windfarm, consisting of 8 x 127m 2.1MW turbines, was built during 2012 and starting operating in January 2013¹. Noise emissions were immediately experienced and recorded by villagers primarily in Graveley, and to lesser degrees in Toseland and Great Paxton. Complaints to the councils have been copied in a 'Round Robin' which includes SCDC and HDC councillors, EHO officers, the wind farm owners (Greencoat UK Wind PLC) and other parties. The number of people in the original 'round Robin' was about 25. Currently, the updated version is approximately 15. There records are on several computers with the complaints going back to 2013.

2.2 The number of complaints recorded on the 'Round Robin' to 2016 exceeded 2000. Counting stopped then when it was realised the councils were not recording them. Response by councils to individual complaints very rare.

¹ Details of the CFWF planning application, appeal and the communities concern and all details about noise are available on Chris Heaton-Harris MP's web site. <https://www.heatonharris.com/campaigns/wind-publications>. Scroll down to the acrobat link for work package 9 (WP9). 'Cotton Farm monitor experience'.

Residents Experiences.

3. Most people in the village of Graveley have experienced noise imissions at some time or another and to a greater and lesser degree. Some are more affected than others and there are cases when individuals have had to leave their homes due to turbine noise emissions. The number of people experiencing noise nuisance is greater than the people who actually send in complaints.

Overall experience of complaints by residents to the councils.

4. **Please note**, this document is a guide for an individual complaint to the Ombudsman. The Ombudsman needs to have evidence of your complaints and the evidence of the response and actions of the council to your complaint.

5. As the villagers affected by the noise from the windfarm are aware, the council officers, on the infrequent occasions of acknowledging complaints, have often handled them on a collective basis and the Ombudsman should be made aware of this. This is why the Joint statement by the councils is included in appendix 1.

6. The problem the Ombudsman should also be made aware of is that the vast majority of the complaints by individuals to the councils have not been responded to by the council officers. This is why it is essential to have the evidence as to why and how this has occurred to back up occasions when your complaints have not been responded to. SCDC officers have personally visited the village based on the procedures under Statutory Nuisance which resulted in the comments in the joint statement (Appendix 1)

7.1 It is very important to emphasise the fact that the council officers have stated they do not have the correct guidance or legislation to follow through complaints. They have asked central Government for help. This has not been forthcoming to date. (See letter in appendix 2)

7.2 Before we look at what the councils should have done we should consider what is causing the community's angst at the perceived lack of action by the councils.

The use of Statutory Nuisance (SN)

8. At the appeal in 2010 the developers, in common with all the wind industry developers at the time, stated they did not believe there would any problems with noise from wind turbines (WT), especially the noise generated by the rotating blades and referred to as Excessive Amplitude Modulation (EAM). The CFWF appeal inspector in 2010 reluctantly agreed with the developers that if EAM was experienced it could be handled by SN laws. See para 90 in the planning approval document, APP/H0520/A/09/2119385, where the inspector states-:

90. In the unlikely event of a problem of excess AM arising, the appellant suggests that it could be addressed by the local authority using statutory nuisance powers. Whilst I have some misgivings about this procedure because of the much higher threshold of harm that would inevitably apply, I see little option but to conclude that this is the best means currently available of resolving this issue.

9.1 It is a point to note nowhere within the UK to the authors knowledge, has any local authority used SN to pursue a wind turbine (EAM) noise complaint.

See WP3.1 in <https://www.heatonharris.com/campaigns/wind-publications>.²

The experience of both SCDC and HDC in responding to the noise complaints and its effectiveness through SN is also recorded in the Chris Heaton Harris MP's web site. See WP6.2 in <https://www.heatonharris.com/campaigns/wind-publications>.

9.2 It is worth noting SCDC did respond to Chris Heaton Harris MP's letter with respect to EAM. See 8.5, page 14, copied below, where the EHO admitted he had experienced EAM himself. HDC, on the other hand, did not respond to the original request, despite a follow up letter from Chris Heaton-Harris MP requesting this.

<i>"Officers from HDC formally invoked planning condition 24 at Cotton Farm following the receipt of AM type noise complaints. Since identifying the noise limit breaches the operators have implemented a 'curtailed' operational mode as opposed to full operation. I can confirm that officers have heard occurrences of AM noise, however our investigation is on-going and we have yet to determine whether a statutory noise nuisance exists, or is likely to occur or recur."</i>	Greg Kearney, Environmental Health Officer, South Cambridgeshire DC
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Mr. Kearney made a very important point in this response. It will referred to later.

The original Environmental Impact Assessment (EIS) on Noise.

10.1 The planning regulation or specification used to assess the background noise levels for a planning application for a wind farm is known as ETSU-R-97. Essentially the background noise data, collected in 2006 for CFWF, was used to provide a set of two tables (one for night, the other for day) in the approval document which is based on a number of monitored locations. This is to provide the maximum noise levels turbines can operate to, in dB's, at differing wind speeds.

10.2 These tables can be found in the planning approval document, APP/H0520/A/09/2119385, under Noise Condition 24, (C24) page 48. It is purely a method of providing a maximum noise (dB) for planning purposes based on a near steady noise generated by the nacelle equipment with a minimum AM level (+/-3dB).

10.3. The methodology for getting the figure is complex³ but, essentially, in 10 minute segments (known as data sets) only 10% of the lowest noise is used and averaged. It is the plotting of these many 10 minute average figures on an x-y chart

² WP 3.1 is based on an MP's letter to Local Authorities (LA), and its responses to turbine noise complaints, as experienced by the LA's in England. It highlights the confusion within the LA's over turbine noise complaints and how to deal with it.

³ 10 minutes of background noise is recorded and just one minute the lowest noise data is grouped together and averaged. It is this average that is a single point representation of the full 10 minutes of noise. The theory is to remove odd separate noise incidents which could contaminate the average. This data is collected for the planning application and the noise condition in the approval document.

which are used to provide the drawn average line (a polynomial) through the dots to provide the maximum dB levels at differing wind speeds.

Responsibility of responding to Noise complaints.

11. The wind farm is located in the HDC area but Graveley, the most affected village, is in SCDC. Both councils agreed that HDC were to lead in the handling of all the affairs with respect to the wind farm. This included complaints from within the SCDC areas. This is why the community organised the complaints to be sent to both council EH officers and their elected ward representatives by a 'round Robin' email. The wind farm owner's directors were also included in the list.

12.1 With the barrage of complaints the two councils, not being able to pursue (EAM) noise complaints because there was not, in their opinion⁴, any legislation they could refer to. They jointly agreed to send a letter to the then Secretary of State (Amber Rudd MP) requesting her department (DECC, now DBEIS) to provide the appropriate legislation to cover EAM from wind farms. (Letter copied in Appendix 2). A meeting was held with the then Energy Minister, Andrea Leadsom MP, with MP's, council and community representatives attending. DECC, as a result, instigated an investigation to create the appropriate legislation specifically for EAM complaints but the eventual AM Proposal and recommendation, provided in 2017, was not tested or proven.

12.2 The AM legislation proposal work was done under the control of the Institute of Acousticians (IoA) AM Working Group and contracted, by DECC, to WSP/PB Ltd. Details of the AM planning document proposal and a document proving it is 'unfit for purpose' is available from <https://www.heatonharris.com/campaigns/wind-publications>. See WP8.1.

12.3 The 'AM proposal', robust or not, was of no help to the local councils anyway. The proposed legislation was for future WF developments only and did not help with CFWF AM noise complaints.

13. However, the local councils involved with CFWF have concentrated on the problems of EAM and have neglected to carry out the proper procedures of complaint referred to in C24. The council officer's joint statement document⁵ is based on the noise assessment noise data collected by the developer of CFWF in 2013. It refers to 'compliance' assessment under ETSU but 'complaints' under Statutory Nuisance. Both, from the beginning, should have been assessed under C24 as 'noise complaints' and, if the CFWF was proven compliant under ETSU, then the EAM problem should be pursued. This action would also prove that the ETSU specification was not 'fit for purpose' because it does not protect the community from noise nuisance. This opens the way to use legal argument when the planning approval decision is proven to be flawed and there is case law allowing this to be pursued in the courts.⁶

⁴ The use of the noise regulation for 'man made' noise, BS4142 can be applied. The development of ETSU was originally designed to by-pass BS4142 in 1996 to allow WT's to be installed near to communities.

⁵ Refer to appendix 1, the joint statement by the EH departments of HDC and SCDC.

⁶ Coventry & Ors v Lawrence & Anor [2014] UKSC 13

CFWF Monitoring in 2013.

14. Assessment of the 2013 data by HDC identified the simple fact that the CFWF did not comply with the planning approval noise condition 24. HDC, later, employed an acoustician to examine the same data and he concurred that breaches of the approval were identified. However, the acoustician also stated, in his report, CFWF would comply if the turbines were operated in a reduced (or curtailed) mode.⁷ The CFWF owner immediately agreed to 'curtail' the turbines. This same (2013) data was examined by other acousticians and many more breaches of the planning conditions were identified even when the turbines were in curtailed mode.

(Note: The 2013 data included times when the turbines were also in curtailed mode. See para 48 in WP9, <https://www.heatonharris.com/campaigns/wind-publications>)

15. However, as a result of continuing noise complaints, the CFWF owner had the turbines modified by the application of serrated strips on the trailing edge of the blades to reduce the noise generated by the blades. This was completed in 2017. The recordings on the community noise monitor proved there was very little, if any, change on noise output.⁸ Noise complaints continued. However the modifications allowed HDC the opportunity, and under pressure from the community, to have the CFWF re-assessed to ensure it complied with the planning consent. This exercise resulted in the re-monitoring noise emissions from the CFWF from five locations and, at the insistence of the community, recorded the audio record in real time for EAM evaluation⁹. This exercise commenced in January 2018 and finished in July 2018.

Result of monitoring in 2018

16. The monitoring was completed in July. However, there is some confusion over how this data was to be assessed. Each party wanted the data to be assessed in different ways. To date methodology assessment has not been agreed.

A) HDC wanted to carry out the compliance i.a.w. C24 only. (HDC specifically advised it was not complaint procedures, just compliance.

B) The community (via the residents association, or CFRA) wanted the data to be used to both identify breaches using the complaints procedures as per the planning approval in C24 and for the EAM noise issues to be assessed and available to test against existing or future legislation.

C) The CFWF owner's acousticians want compliance tested i.a.w. ETSU only.

17. HDC, in A), have decided to prove compliance only, not complaint. However, the method they are wanting to use is based on the owner's acousticians wanting complete control over the assessment methodology as indicated in C)

18. The community, in B), want the same ETSU procedure to be used to follow the 'complaints' procedure as described in C24 with certain agreed caveats. EAM

⁷ The HDC contracted acoustician, Mr. D. Bowdler. He did not explain how he came to this conclusion and HDC, apparently, did not ask.

⁸ The community has financed and installed a monitoring station in Graveley recording all noise emissions from CFWF since 2013.

⁹ Recording in real time, in audio, has, to the authors knowledge, not been done in the UK, possibly Europe, before.

evaluation should be evaluated under C24 and as a separate issue¹⁰ in case of C24 compliance.

19. During the course of the discussions a very close look at the C24 has identified the simple fact that C24 is a complaints procedure only. It is not a document of 'compliance'. Further to that the C24 does not define noise specifically and, therefore, does not exclude EAM noise complaints.

20. Therefore any noise complaint, whether noise from the machinery in the nacelle or blade noise (EAM) or even low frequency noise (and infrasound) should have activated the complaints procedure identified in C24. **This should have taken place back in 2013 using the 2013 data.**

21.1 The data collected in 2013 could have been easily processed by the councils using C24 as a complaints procedure. It wasn't. The data collected in 2018 can also be used to test the planning approval i.a.w. C24. HDC are only interested in 'compliance'.

21.2 SCDC, being made aware of the 'compliance only' stance by HDC should, it has been suggested, take over responsibility of 'complaints' procedures under C24.

22. In other words the councils are not following the laid down procedure in C24 but are following the (HDC led) agenda which is totally separate from the complaints procedures and not part of the CFWF approval decision. There is nothing wrong with carrying out an assessment to prove CFWF compliance; it is, however, an independent decision by HDC following the blade modifications. It is, however, not an action directly in response to the complaints being made by members of the community.

23. It is important to note that the compliance i.a.w. ETSU is a planning procedure and is designed as a process for planning purposes only. It has nothing to do with noise that people hear. These are totally separate issues....but, the noise people hear and complain about is still a 'noise' and this is why there is a C24, with its complaint procedures, in the approval document.

24. The councils, especially SCDC, have concentrated on the EAM noise only and complained there is no legislation for it. That is true, but it **does not alter the fact they should have followed the complaints procedure as described in C24 from the very beginning.**

25. Mr. Kearney, from SCDC, stated that C24 was started in his response¹¹ to Chris Heaton-Harris MP's request. (See para 9.2 above). It is unfortunate the procedures for following up (EAM) noise complaints under C24 were not continued by his successors after Mr. Kearney left.

¹⁰ BS4142:2014. This 'man made' noise specification which covers all noise issues in society, also covers wind turbine noise including EAM. The latest 'WHO Europe' also advises on wind turbine noise with recommendations close to BS4142:2014.

¹¹ See para 9.2 above.

Making a complaint to the Ombudsman.

26.1 The above details are a guide. It is important to be as brief and as clear as possible in filling out the Ombudsman's form.

26.2 It is a suggestion the complainant identifies the number of complaints he or she has made (it can be approximate. Six years is a long time) and advise how often you have, individually, had a response from your EH department. If you have kept a log at any time say you have and ensure you have a copy on your computer. In the early days SCDC, under Greg Kearney, had residents send in individual logs. They should be still on record in SCDC.

26.3 If you had a response from the council officers direct to you it is suggested you quote that response and the date. This is very important because your complaint is only valid, as I understand it after talking to the Ombudsman's office, if the council procedures have been followed and your complaint is based on non-satisfaction after the council has exhausted its procedures.

26.4 The joint statement, copied in Appendix 1, is the response to all the complaints made by the community up to that time and should also be quoted as their response to earlier complaints. (A clear PDF copy can be forwarded by email.)

26.5 The collective pressure on the councils through a massive number of complaints and direct actions via CFRA has produced some action and responses and, very importantly, the official re-monitoring of CFWF. However, the councils have not, it is now suggested, followed the proper procedures as laid down in the noise condition 24 in the planning approval document and that is a very important element of your complaint to the Ombudsman.

26.6 The problem of EAM would, very likely to have gone away if the CFWF was proven to be not compliant i.a.w. with C24 if the complaint procedures were properly followed through.

26.7 The councils did follow the EAM noise problem up to a point and acknowledged the use of SN laws does not work. (It is recognised to very costly and could take years.)

Comment on the complexity of C24

27.1 I must add a personal footnote here about C24. The processes and text in the condition was originally written by wind industry acousticians as a guide to planners and is very detailed and, in my opinion, unnecessarily complex. It uses a lot of jargon and technical terms which are very confusing to the average person (including EHO's). It has been cut n' pasted into many approval documents in various forms but the main thrust is the same. Some have said it is a document designed to be deliberately confusing and, despite its obvious obfuscations, it is really designed for the wind farm owner (and their acousticians) to both control the monitoring required when complaints are made (a process which could take years) but to also have the final 'yes/No' decision on the validity as a complaint. It is not obvious whether they have to explain how they came to that decision. In 2013 the CFWF developer's

acousticians did precisely that at CFWF. They stated CFWF was compliant under ETSU. It wasn't, as HDC and the CFRA acoustician proved.

27.2 CFRA consulted a number of experts in attempt to truly understand what C24 actually is saying and how it works. Essentially and in a nut shell, it is a complaint document, not a compliance document.

27.3 The single and most damning omission from the planning approval document is the simple fact that the CFWF developers were not ordered to test the noise emissions from the windfarm and prove its compliance before it was signed off as 'compliant'. This should have been insisted on by the councils at the pre determination stage. All wind farms, existing and in the future, should be permanently monitored as other industries are being closely monitored. i.e. Fracking, airports, etc.

28. The community have copies of all the monitored data from CFWF, including the turbine SCADA data, which allows for an immediate complaint assessment i.a.w. C24. This can be cross referenced with the community monitor data as well. The council(s) could contract independent professional acousticians to assess the data i.a.w. C24 and advise on EAM, within a few weeks.

In fact the Parish council could consider doing this. All the data required is available.

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Appendices attached



Joint Statement of Huntingdonshire District Council and South Cambridgeshire District Council regarding noise from Cotton Farm Wind Farm – November 2015

Huntingdonshire District Council and South Cambridgeshire District Council is working collaboratively regarding complaints of noise from the wind turbines at Cotton Farm jointly release a position statement regarding compliance with the planning consent for the site, and their investigations regarding statutory noise nuisance.

Chris Stopford
Head of Community
Huntingdonshire District Council

Paul Gulgley
Head of Environment Commissioning
South Cambridgeshire District Council

Huntingdonshire District Council Position Statement regarding Planning Decision APP/H0520/A09/2119385 relating to Cotton Farm Wind Farm

The Planning decision relating to Cotton Farm Wind Farm set rating levels of noise from the combined effects of the wind turbines. Whilst not specifically required by the conditions of the planning approval, two compliance reports have been submitted to Huntingdonshire District Council (HDC) by the wind farm operators. These reports have been reviewed by Officers of HDC, and by an independent noise consultant commissioned by HDC and are considered to be sufficiently robust as to be used by HDC in assessing compliance with the planning condition

The requirement for the submission of further noise assessments is only in response to complaints regarding noise being received by HDC, as the local planning authority, and formal requests being made by HDC to the wind farm operators.

The first compliance report showed that noise from the turbines in **full operating mode** was above the levels set out in the planning decision.

Following discussions between HDC and the wind farm operators, the operators implemented a **curtailed mode of operation**.

A second compliance report was subsequently submitted to HDC which demonstrated that in the **curtailed mode** the turbine noise levels are within the levels set out in the planning decision.



On this basis HDC is satisfied that when the turbines are operating in curtailed mode noise from Cotton Farm Wind Farm is within the levels set out in the Decision Notice. HDC has received an undertaking from the wind farm operators that the turbines will only be operated in curtailed mode. Under the planning conditions noise assessments can and will be requested from the wind farm operators if required.

With regards to Amplitude Modulation (AM), the Planning Inspector in determining the application stated that he found *'no compelling evidence that warrants an approach to AM in this case which differs from that taken in ETSU-R-07. In these circumstances I do not believe that the suggested condition satisfies the test of necessity, even on a precautionary basis. In the unlikely event of a problem of excess AM arising, the appellant suggests that it could be addressed by the local authority using statutory nuisance powers. Whilst I have some misgivings about this procedure because of the much higher threshold of harm that would inevitably apply, I see little option but to conclude that this is the best means currently available of resolving this issue.'*

As such, there are no specific planning conditions regarding amplitude modulation.

Huntingdonshire District Council Position Statement regarding Statutory Noise Nuisance, excluding Amplitude Modulation from Cotton Farm Wind Farm

Huntingdonshire District Council (HDC) have been independently monitoring and investigating noise complaints regarding nuisance from the Cotton Farm Wind Farm received from its residents. Investigations have included:-

- where possible sending officers to witness to noise that is subject to the complaints, both in terms of visiting the person making the complaint, and visits to the general location of the complaint to undertake 'subjective assessments'.
- the review of email updates, noise reports, and noise diary sheets completed by HDC residents
- the undertaking of noise monitoring, either by way of attended short-term monitoring, or the installation of noise nuisance recording equipment, allowing residents to make real-time audio recordings of the noise disturbance when it is occurring

To date, in HDC's opinion, no evidence has been obtained regarding statutory noise nuisance from noise attributable to Cotton Farm Wind Farm witnessed from properties within the HDC boundary.

Whilst statutory nuisance has no legal definition, a working definition has emerged through case law, to include the test of "a significant interference with a person's use or enjoyment of land or some right over, or in connection with it".



In considering this test the Council must consider:-

- the time of the day
- the duration of the noise
- the nature of the noise in terms of its volume, and characteristics
- the frequency of occurrence, continuous or repetitive or isolated incident whereabouts the noise is heard
- the character of the neighbourhood
- any unusual sensitivity
- requirements of the law, including the impact of case law, and possible defences provided by legislation such as Best Practicable Means, and any appropriate and relevant guidance

Having reviewed and assessed the evidence available to date, HDC is of the view that the noise is not a statutory nuisance, and therefore it is unnecessary and inappropriate to take formal enforcement action under statutory nuisance legislation.

South Cambridgeshire District Council Position Statement regarding Statutory Noise Nuisance, excluding Amplitude Modulation from Cotton Farm Wind Farm

South Cambridgeshire District Council (SCDC) have been independently monitoring and investigating noise complaints regarding nuisance from the Cotton Farm Wind Farm received from its residents. Investigations have included:-

- where possible sending officers to witness to noise that is subject to the complaints, both in terms of visiting the person making the complaint, and visits to the general location of the complaint to undertake 'subjective assessments'.
- the review of email updates, noise reports, and noise diary sheets completed by SCDC residents
- the undertaking of noise monitoring, either by way of attended short-term monitoring, or the installation of noise nuisance recording equipment, allowing residents to make real-time audio recordings of the noise disturbance when it is occurring

This evidence has also been cross referenced with the Cotton Farm Wind Farm Permanent Noise Monitoring Exercise website and Wind Farm met data, as necessary and then reviewed and assessed taking into account the following factors:

- Nature and characteristics of the locality / neighbourhood where noise occurs
- Time of day when noise occurs
- Duration (how often it occurs) and intensity (level and type) of noise
- Motive of defendant / Convention (normal use)
- Particular sensitivity
- Reasonableness of land use
- Reasonableness of potential enforcement action
- Possible Defences (including use of Best Practical Means / Reasonable Excuse)



- What measures could reduce or modify the noise
- Relevant case law on Statutory Nuisance

Having reviewed and assessed the evidence available to date, SCDC have independently reached the view that with respect to complaints made by their own residents there is not a statutory nuisance, and therefore are unable to take formal enforcement action under statutory nuisance legislation.

Joint Position Statement of Huntingdonshire District Council and South Cambridgeshire District Council regarding Amplitude Modulation (AM) from Cotton Farm Wind Farm

With regards to AM at this point in time the exact mechanisms that cause AM are not known and there is no accepted guidance on its investigation or possible mitigation. Several working groups are investigating AM with a view to Government producing best practice guidance, including measurement and threshold metrics. However, noting the Planning Inspectors misgivings about use of the statutory nuisance procedure, HDC and SCDC are of the view that until agreed guidance and metrics are issued they are unfortunately unable to undertake any further investigative or enforcement action under that statutory nuisance procedure.

HDC and SCDC's positions are being kept under constant review in the light of any changing circumstances, particularly emerging national / industry best practice guidance on AM and when an appropriate methodology is published, both councils will undertake a further review of this position statement.

In the interim, both councils will continue to seek to work openly and constructively with the wind farm owner and operator and with the Cotton Farm Residents Association to explore and influence continued voluntary measures for mitigation.



The Rt Hon Amber Rudd MP
Secretary of State for Energy and Climate Change
House of Commons
London
SW1A 0AA

22nd December 2015

Dear Amber Rudd MP

In June 2010, an application for planning permission for the development of an on-shore wind turbine site of eight turbines was granted by the Planning Inspectorate, for Cotton Farm Wind Farm, Cambridgeshire. The site was subsequently developed and commenced operation. Shortly thereafter the two District Councils started to receive noise complaints regarding noise emissions from the turbines.

The Councils have continued to investigate complaints, and have worked alongside the local residents group, Cotton Farm Residents Association, the developer of the site, Bayware, and the current owners, Greencoat Capital. The Councils have reached a position whereby they are satisfied that the site complies with the planning condition, and is not currently causing a statutory noise nuisance, based on currently published guidance and best practice. This position does not however fully address the residents' concerns regarding noise, and in particular issues regarding amplitude modulation.

The Councils are aware of the work commissioned by the Department of Energy and Climate Change (DECC), in Contract TRN 970/01/2015 Review of the evidence on the effects of and response to amplitude modulation (AM) from wind turbines, with a view to recommending how excessive AM might be controlled through the use of a planning condition, however, is not aware that this commissioned activity has yet reported.

The Councils are further aware of the work of the Institute of Acoustics, Amplitude Modulation Working Group (IoA AMWG); and the work of the Independent Noise Working Group (INWG) reported the group through Chris Heaton-Harris MP.

In June 2016, the Government announced changes to the Renewables Obligation, effectively removing the majority of new onshore wind sites from subsidy from the 1st June 2016. With this in mind, it would be easy to suggest that the work of the DECC commission, the IoA AMWG, and the INWG would have little ongoing demand as the likely future of onshore wind and planning will diminish. However, this should not be the case, there are many operating onshore sites which over the next few years will come before local planning authorities for renewal of planning consents, the majority of the original planning consents being limited to 25 years; further, the publication of robust guidance will provide a robust assessment methodology on which to base complaint driven investigations.



The two Council's request your support in ensuring that, as soon as possible, the various commissioned works are reported and formalised such that the Councils have some robust guidance on which to base an assessment, and protect the amenity, environment, and health and wellbeing of our community.

A handwritten signature in black ink, appearing to read "Jason Ablewhite".

Cllr Jason Ablewhite
Executive Leader
Huntingdonshire District Council

A handwritten signature in black ink, appearing to read "Ray Manning".

Cllr Ray Manning
Leader
South Cambridgeshire District Council