

## Lissa Rowan

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**From:** kenny more [REDACTED]  
**Sent:** 04 September 2018 12:17  
**To:** Lissa Rowan  
**Subject:** Re: Planning Application - 18/00694/APP

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Hi Lissa

Below is our response to the EHO's correspondence,

Thanks & regards,  
Kenny

The initial meeting held at Moray council office included the repositioning of the proposed turbine to meet with the planners and road departments requirements and the discussion on carrying out our own noise survey. The Environmental Health Officer (EHO), advised that readings for both wind & noise required to be recorded @ 10 minute intervals. The EHO did advise that the noise meter was to be of a type, as used by Moray council and it was discussed the use of other noise meters. At the end of the meeting, the EHO was very upfront about saying he did not agree to us carrying out our own survey.

On a later site visit after we had completed compiling our noise survey, he personally witnessed our test method and left behind a highly technical document referring to numerous calculations, acronyms and procedures.

We were left with the impression that at no time would he consider anything other than a very costly professional noise survey. The high cost of a professional noise survey, even at the lower cost claimed by the EHO in his response and with no guarantee of success of the application is grossly prohibitive and unrealistic for a domestic installation.

On another visit to our site 11th May the EHO personally witnessed high background noise of 50db and higher where by wind speeds were nowhere near the proposed wind turbines upper 8m per second/40db acceptable noise level, green area at a position 100m away from the turbine as seen on the Kingspan manufactures supporting document. The EHO response comment is copied below.

"When carrying out my site assessment on 11 May, it was very apparent that the local area is subject to elevated tree noise levels during high wind periods as I experienced gusty conditions that exceeded the capabilities of my noise meter's wind shield with greater than 5m/s wind speed at the measurement height of 1.3m. Whilst levels of 50 dB(A) and higher may indeed occur in high wind conditions, the assessment of noise levels and correlation with wind speed should be to the standards highlighted within ETSU-R-97 and the associated IOA Good Practice Guide".

The proposed position of the wind turbine is 97m from our neighbouring property and is just inside the amber zone of Kingspan noise data graph. It should be noted that this is the absolute noise level and does not take into consideration surroundings and obstructions that are obviously present in our application that will unquestionably reduce noise.

We used the same instrumentation that was used for Drayton house that was accepted by the Scottish ministers -

The EHO compared the noise meter we used with Moray councils for accuracy and the meter we used read a little higher than his at low noise levels and slighter lower than his at higher noise levels, both instruments were relative and we believe to be within acceptable limits. If anything the noise levels we

recorded at higher winds speeds is less favourable for us compared to the higher readings the councils own high cost instrument registered when winds were gusting.

At the time of conducting our noise survey all readings were taken in the very best lowest noise conditions which is not the norm for this rural site. The photographs we have provided clearly show farm animals grazing in the opposite fields bordering the road and our neighbours house, the animals are present from early spring until early winter. The animals are moved on occasion by the farmer and the fields are farmed, eg grass cut for silage, also seen on photographs provided. We carried out our noise survey when no farm animals or farm activities or vehicles passing on the road which would have resulted in higher noise level. Anyone who lives near a farm will appreciate just how much noise farm animals make, they make in excess of 70db's (continuous night and day), again this is much higher than the proposed wind turbine noise level would be at our neighbouring property.

We appreciate and accept that improvements are made to protect persons from noise pollution and changes were made after the Drayton house appeal was lodged and won but Drayton house is 30m closer (1/3rd closer) to the neighbouring property.

I can also confirm the reason why the wind turbine for Drayton house was not installed was due to the lengthy time for the appeal resulting in the applicant missing out on financial aid (grant) and making it non viable for the applicant.

The EHO has rejected to accept credited data from numerous international bodies for noise reduction by trees and shrubs and has rejected that background noise levels exist above the noise emitted by the proposed turbine.

We have demonstrated that the noise from the wind turbine, above the cut-in speed of 3.5m-s, will be less than the background noise for the site and the turbine noise will be undistinguishable at our neighbours property at 97m away from the proposed turbine position.

A visit to the proposed site on a breezy day will clearly identify, without the use of any instruments that there is high background noise.

It would be of the utmost disappointment and grave inopportunity to have a zero carbon footprint rejected due not satisfying the EHO who clearly rejects proven worldwide data provided and dismisses the fact that the site is subject to high noise/wind that he personally witnessed all be because we did not follow his criteria and did not use very expensive instruments or employ a high cost professional surveyor. We strongly believe we have carried out a fair and accurate noise survey that demonstrates a high background noise exists, we would not be applying for this if we thought for one moment that it would cause any concerns to our neighbours.

The Scottish Government is encouraging households to reduce carbon dioxide emissions, a major cause of climate change and reduce our reliance on fossil fuels. To utilise environmentally friendly renewable energy sources to help reduce global warming and sustain the future of the planet.

We strongly believe we have the ideal location and opportunity to support this but are being prevented from doing so by the EHO rejection of proven and demonstrated information provided.

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**From:** Lissa Rowan <Lissa.Rowan@moray.gov.uk>

**Sent:** 04 September 2018 09:25

**To:** 'kenny more'

**Subject:** RE: Planning Application - 18/00694/APP

Hi Kenny