



INWG Position Statement

Assessment and Rating of Wind Turbine Noise - 2026

ARWTN, the delayed successor to ETSU-R-97, the Assessment and Rating of Wind Turbine Noise, was released on 19 June 2026 by DESNZ, the UK Government Department for Energy Security and Net Zero. Fundamentally unchanged from ETSU-R-97, ARWTN carries forward the basic flaws and failings of ETSU-R-97 thereby allowing the continued deployment of wind turbines irrespective of their significant impact on neighbouring communities, and irrespective of their increasingly detrimental impact due to the considerably larger size of the latest generation turbines, coupled with the government's drive to double onshore wind capacity. To add further injury, relaxations in ARWTN usher through the deployment of these larger turbines.

Far from addressing the World Health Organisation's 2018 Environmental Noise Guidelines concern that *"further research into the health impacts from wind turbine noise is needed so that better-quality evidence can inform any future public health recommendations properly"*, ARWTN, as its predecessor, aims only to *"provide 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."*

A record of the bad science and politics that has allowed members of the public to be regarded as collateral damage in the name of Net Zero is detailed in the INWG's 2025 report, ETSU-Gate Three Decades of Deception. ARWTN permits 'business as usual' providing continued immunity for the wind industry from any meaningful actions in the face of noise complaints. ETSU-Gate Chapter 14 examines the barriers faced and legal issues regarding wind turbine noise complaints. Obtaining redress in respect of wind turbine noise is a prolonged, stressful, financially taxing and herculean task with no guarantee of resolution, the opposition historically demonstrating a determination to derail and undermine the process every step of the way.

The government's consultation on ARWTN appears to have been a tick box exercise seemingly paying only cursory consideration to the INWG response to the government's consultation on ARWTN and to the responses of other third parties. While detail of the INWG consultation response is not repeated here, some comments on the new guidance, ARWTN, are provided below.

ARWTN, page 2, 'Acknowledgements', names the UK government, the wind industry and a number of acousticians as responsible for its formulation. Many of the names are familiar in

the area of wind turbine noise including a number of the original ETSU-R-97 authors from 1996, who in the main act as witnesses for the wind industry in planning matters and legal challenges. This small group of individuals and their acoustic consultancy companies have dominated wind turbine noise guidance for three decades, systematically excluding and denigrating dissenting views and inconvenient evidence.

ARWTN page 2, 'Potential effects which do not require assessment' cites Infrasound at para 1.21 and low frequency sound at para 1.23 as not requiring assessment when considering noise from wind turbines. These blanket statements blatantly ignore the decades of evidence that low frequency sound, including infrasound is at the core of most noise complaints and associated health impacts. Removal of the low frequency components from measured noise during assessments is an enforced way to ensure that any troublesome wind turbine sites are deemed to meet permitted noise allowances thereby avoiding direct resolution of the real problem. These topics are discussed in ETSU-Gate Chapter 15: Advances with low frequency noise, and Chapter 16: Health & Wellbeing.

ARWTN now includes an assessment of amplitude modulation (AM) but mandates an opaque wind industry designed AM measurement methodology. This has been shown to under record AM levels and to fail to limit even the highest levels of measured AM.

When addressing cumulative effects, ARWTN makes it easier to completely surround rural communities with wind turbines.

It remains the case that noise limits are determined according to the generating capacity of the wind turbine site and the surrounding population density. In other words, the larger the site and the lower the surrounding population density, the greater the permitted noise levels. This approach is unscientific and contrary to natural justice; everyone should have the same level of protection from wind turbine noise, including those with a financial involvement.

Organisations including the INWG have long argued that ETSU-R-97 should be replaced with BS4142 which is used for assessing virtually all other industrial noise sources. BS4142 compares the noise impact at a specific location by assessing noise loudness and character compared with the actual background noise level, whereas the new guidance remains based on an opaque averaging process and derived noise limits. ETSU-Gate Chapter 19 provides the argument for adopting BS4142 with additional detail in Appendix A.

The government excluded the use of BS4142 from its consultation and failed to provide a meaningful response for not using BS4142 when it was raised by consultees. The use of ARWTN instead of BS4142 permits higher noise levels, most especially at night, from wind turbines than is permitted from other forms of industrial activity. The imposition of harmful levels of noise from wind turbines leads to the conclusion that this could only occur as a result of government policy, or unofficial collusion. Indeed there is a glaring conflict of interest here with the government DESNZ responsible for both wind power deployment and the associated noise guidance. DESNZ is effectively marking its own homework.