

2nd October 2024

Rt. Hon. Ed Miliband MP,
Department for Energy Security and Net Zero
55 Whitehall
London
SW1A 2HP

Dear Secretary of State,

Proposed revisions to ETSU-R-97 guidance on Assessment & Rating of Noise from Wind Farms

Your recent decision to lift the previous Government's embargo on onshore wind turbines has prompted us to urge your Government to pursue a revision of the above guidance, which was originally published in 1996. This same letter has been sent to your counterpart in the Department for Environment, Food and Rural Affairs.

We acknowledge the previous Project Report, published in September 2023 by WSP, as well as the fact that the contract for revising ETSU-R-97 has been awarded to Noise Consultants Limited. As we represent acoustic experts and practitioners from the Chartered Institute of Environmental Health (CIEH) and the Institution of Environmental Sciences (IES), we wish to share our expertise on how the guidance could be most effectively revised.

We accept the need for cheaper and more secure energy for the UK. Delivering on that ambition in a just and fair manner requires an approach that avoids unforeseen consequences, particularly the potential for residents to be negatively impacted by sound generated by wind turbines.

Noise pollution remains a significant public health and economic burden that requires urgent attention. The [House of Lords Science and Technology Committee's inquiry](#) found that 130,000 healthy life years were lost in the UK because of noise pollution in 2018, and that 40% of the population remain exposed to harmful noise levels from traffic pollution.

ETSU-R-97 is outdated and unfit for purpose. Without clear and adequate guidance, the permitting of onshore windfarms could face major delays and lead to undesirable outcomes. New guidance should be developed as a matter of urgency, reflecting the latest British Standards, guidance from the World Health Organisation and the latest scientific evidence on the adverse effects of noise from wind turbines.

Specifically, we recommend the following:

1. **Noise limits:** That the 'noise limits' defined in the ETSU-R-97 guidance should be replaced with effect thresholds for adverse and significant adverse impacts on health

and quality of life from noise. The effect thresholds should be based on the best available scientific evidence of the impact of wind turbine noise including, but not limited to the WHO's systematic reviews of the health effects of environmental noise. We also recommend that experts in noise and health are engaged in the process of defining the effect thresholds.

2. **Amplitude modulation guidance:** That adequate guidance is developed for controlling amplitude modulation and any other acoustic features likely to affect the perception of the sound.
3. **Community engagement:** That guidance is developed on effective community engagement as a means of mitigating the adverse effects of noise.
4. **Community support:** That guidance is produced on the positive contribution that could be provided on the perception of noise from onshore windfarms through schemes to share the benefits associated with onshore windfarms and by embedding social value into development proposals.

We would also request that the CIEH and IES are engaged fully in the process of updating the noise guidelines.

Letter sent on behalf of:

Chartered Institute of Environmental Health
The Institution of Environmental Sciences

