

---

**Technical Note****Element Materials Technology**

To: Alpha Design Architectural Services (Glen Beattie)  
From: Element (Stephen Wigham)  
Date: 15 July 2021  
Copy:  
Our reference: ENE-5052-N002\_Rev1  
Classification: Public

**Subject: Planning Application Number: 4/21/2136/0B1 - Phase 4, The Mount - variation of condition**

---

I write following the receipt of objection comments from the adjoining landowner regarding his wind turbine, email dated 05 July 2021, concerning the submitted Element noise assessment report, reference ENE-0963 The Mount - Noise Report Rev0, in relation to the above application.

The scope of Element report reference ENE-0963, October 2020 was not intended to be an ETSU-R-97 compliant assessment; the scope of the report was agreed in advance with Copeland Borough Council (CBC). A full ETSU-R-97 assessment is not a specific requirement of Condition 6. It should be noted that many of the listed objection comments raised are applicable to the documented ETSU-R-97 assessment methodology, however the Element assessment was not intended to be, nor requested by CBC to be compliant with this guidance document. Due to the lack of a large separation distance between the existing wind turbine and the Phase 4 development, the ETSU-R-97 flat 35 dB at 10 m/s criterion would not apply.

In relation to the Element noise assessment, CBC Environmental Health confirmed the use of surrogate wind-related background noise levels to inform the assessment, which were submitted in support of a nearby windfarm development scheme. Using this surrogate wind-related background noise levels the predicted noisiest operational state of the existing wind turbine was found to be below day and night wind-related background levels, and below the day and night period ETSU-R-97 guidelines. The submitted assessment demonstrated the protection of residential amenity and was suitable to allow the discharge of Condition 6.

CBC Environmental Health were also in agreement and recommended that Condition 6 be discharged.

We note that a site specific ETSU-R-97 compliant report was surprisingly not submitted in support of or conditioned as part of the original planning permission 4/11/2593/OF1 (as amended) (Field No. 4381 15 KW wind turbine).



---

I trust that you find the above to be acceptable; however, should you require any further information please do not hesitate to contact me at any time.

Best regards,

**Stephen Wigham BSc (Hons) MSc PgDip MIOA ACIEH**  
**Principal Acoustics & Air Quality Consultant**

[www.element.com](http://www.element.com)