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Rachel Miller  
Planning Services  
London Borough of Camden  
Town Hall  
Argyle Street  
London WC1H 8ND

15<sup>th</sup> August 2013

Dear Ms. Miller

### Application 2013/3792/P – 39 Parker Street

The CGCA has, at the request of local residents, reviewed in some more detail the acoustic report for this application and we wish to amend our response.

We believe that any use of the basement at 39 Parker Street for a cinema with ancillary bar and cafe has a high risk of causing a loss of amenity to residents living in the area, especially those in Wimbledon Buildings. The wall of one side of the very narrow garden of Wimbledon Buildings is formed by the wall of the 39 Parker Street and it is in this part of the building in which the cinema is proposed to be located.

The concerns we have are the following:

#### **Sound Levels**

We have reviewed the acoustic report in detail and are concerned that it may overstate the current ambient noise level in this location. The acoustic survey was carried out in the summer (when late evening noise is often louder) and the survey position is shown to be at tree top level over the garden of Wimbledon Buildings. We are concerned that carrying out the survey at this height may capture more night time noise from the surrounding area than carrying it out in the garden itself, which is the most noise sensitive area but which has a thick wall shielding it from street level noise such as vehicle traffic. It is this type of noise which the report states is the most prevalent at this location.



Fig 3 from Acoustic Report



Assumed position of Microphone

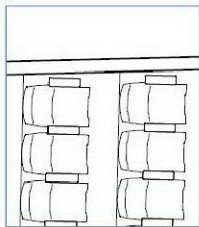
Without a clear understanding of the **actual** existing ambient noise levels in the garden of Wimbledon Buildings it is not possible to be sure that the 46dB limit, which the acoustic report states is required and can be achieved, will not be noticeably louder than current actual level.

## Design Strategy

The Acoustic report sets out in some detail the detailed design needed to achieve the desired noise level. As the report states:

*If detailed and constructed correctly, the following design strategy will achieve the Camden planning requirements based on typical cinema sound levels.*

*The floating concrete floors will be minimum 75mm thick concrete on resilient isolation pads (maximum natural frequency 15Hz), forming an airspace of 100mm to the basement slab and containing 50mm thick mineral fibre. Assuming that the existing outer wall is double leaf brick and that the back of the louvres are infilled with blockwork of the same surface mass as the double brick, the inner walls will be 3x15mm thick acoustic grade plasterboard (minimum 12kg/m<sup>2</sup> surface mass per sheet) on independent studs with 150mm cavity between the back face of the plasterboard and the face of the outer wall. The inner walls will be mounted on the perimeter of the floating concrete floors with 100mm thick mineral fibre in the cavity. There will be no ties between the inner plasterboard wall and the main building structure. The head of the inner walls will have a resilient head detail.*



None of this design detail is shown in the drawings provided. For example the distance between the inner wall of the cinema and the inner wall of the building itself should be at least 195mm (45mm Acoustic Plasterboard + 150mm air gap). However the basement drawing which accompanies the application shows a TOTAL wall thickness of only 110mm.

*Section from Basement Drawing Seats at 550mm centres provide scale*

We also note that the design strategy requires that there is no breakthrough into the structure of the inner box and yet no speakers or other sound equipment are shown in the drawings.

If the drawings do not allow for the required design to be included then we are concerned that the cinema will not be able to achieve the required sound attenuation.

These are not presumably intended to be construction drawings but it is vital that, if Camden are minded to grant the application, that conditions are imposed which ensure that the required acoustic attenuation is achieved.

## Impact of Patrons on the Street

The other impact on residents in the area will be from people on the street. This will be especially noticeable in the late evening. At the moment the East end of Parker Street has no entertainment premises. It is primarily office and residential. A significant proportion of the 120 people who leave the cinema when it closes at the proposed time of 23:30 will leave via Newton Street, which is mainly residential. This is likely to harm residential amenity in what is one of the last quiet enclaves in Covent Garden.

In summary, the CGCA's concerns are:

1. The ambient noise figure used as a basis for the attenuation requirements for the cinema use may be too high. We would ask the Council to require a survey to show the actual ambient noise level for residents in Wimbledon Buildings.
2. The detailed design which is required to achieve even the proposed level of noise reduction is not reflected in the design provided. The Council needs to impose conditions which require that the detailed design is

implemented and that it reduces the noise of the cinema to below the actual ambient noise levels being experienced.

3. The Council should consider refusal based on the impact on residential amenity for residents in Newton Street from a fairly substantial entertainment venue which closes at 23:30.

Please can you advise us of the DC meeting which will consider this application.

Yours sincerely,

