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2017/6027/P	Domenica Sansone	2 Railey Mews NW5	28/11/2017 12:44:55	OBJ	Planning Application 2017/6027/P: Workshop redevelopment at the rear of 38-52 Fortess Road / Fortess Grove OBJECTION London 27/11/2017 Dear Mr Farrant, I am the owner of 2 Railey Mews, and I am writing to object to the latest proposed planning application by Alephco Developments Ltd for the redevelopment of the workshops at the rear of Fortess Road and, in particular, to the redevelopment within the workshop facing on Railey Mews. As you might be aware, this is not an entirely a new planning application, but yet another, proposed amendment to a set of existing applications previously dealt by Senior Officer Gideon Wittingam. I note that the proposed function of the area within the workshop facing the back of Railey Mews has changed once again: the developers now propose to position their plant room here, immediately adjacent to my residential property. This is an alarming prospect, all the more so because the application lacks any meaningful information. Without proper and transparent information, it is impossible to fully assess the redevelopment and how seriously it might affect my property. As the owner of 2 Railey Mews: • I am naturally concerned by the proposed placement of a UKPN Substation next to my party walland a mezzanine with 22 condensing units. Apart from the fact that I do not want to be living bang next door to an electricity substation and 22 condensing units, there is no clear explanation of how the party wall with my property and the wall and window on to Railey Mews are going to be treated, the amount of insulation, or the level sound proofing to be installed; leading to potential noise pollution not only to my property but also to the Mews . The sound report attached to the planning application was reviewed by INACUSTIC, and it was found unsatisfactory. Please see attached report. • I am unclear about the position of my roof terrace with respect to the proposed redevelopment. I understand from the drawings that an array of 22 condensing units are going to be located in the plant room at a mezzanine level: however, the drawings do not show the presence of any extractors / exhaust ducts, which you would normally expect to see indicated on plans. If extractors are positioned right next to my terrace, it will impinge severely upon my rights and the pleasure of using this outdoor space. My terrace, it must be noted, was recently approved by Camden Council and is fundamental to the living quality of a mews house, given the absence of any other outdoor space. • I request more information about the proposed double doors onto Railey Mews and definition of the area shaded in yellow on the ground floor as per drawing 1014-PL-C-00.

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I appreciate the office development must provide a fire escape, but the increased footfall is a serious concern. I fear that such doors rather than be used in an emergency only, would be
regularly used as a short cut to the Pineapple pub and local transports and even worse as a smokers corner. Such misuse will result in disturbing mostly the families at the bottom of the
Mews and increase noise and litter generally for all who live in the Mews.
I therefore request Camden Council to urge Alephco Developments Ltd to improve the level of detail
provided in its application, so as to make clear exactly what is proposed. This will allow us all, as local
residents, to make an educated decision about the merits and acceptability of the proposed redevelopment. Until such clarifications are provided, I OBJECT STRONGLY to the present application.
Yours fatefully
Domenica Sansone
2 Railey Mews
London NW5 2Pa

Environmental Noise
Building Acoustics
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inacoustic is a trading name of ABRW Associates Ltd, registered in the UK 09382861
22nd November 2017 your reference 2017/6027/P
our reference 17-398
Sent to
Michael Pia & Mimi Sansone
1 & 2 Railey Mews
London
NW5 2PA
Review of Noise Assessment Report Submitted in Support of Planning Application at 28-34 Fortess
Road, London.
Introduction
inacoustic has been commissioned to undertake an independent review of the acoustic assessment
submitted in support of Planning Application 2017/6027/P submitted to Camden Council, for a new
plant compound at 28-34 Fortess Road, London. The acoustic report was prepared by Daniel
Saunders of Clarke Saunders Associates and bears the reference AS9808.170725.NIA1.1.
Daniel Saunders has been contacted prior to the issuing of this review, to ensure

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compliance with
the Institute of Acoustics' Code of Conduct.
The plant will be installed on a suspended mezzanine floor, within an existing building, adjacent to 1
& 2 Railey Mews. Importantly, the Application Site shares a party wall with 1 & 2 Railey Mews and the
mezzanine floor is attached to this wall. The existing pitched roof of the Proposed Development
building is, it is understood, to be replaced by an acoustic louvre system, to provide appropriate
airflow rates to/from the proposed air handling plant.
Consequently, this technical note sets out our comments on the technical approach taken and any
areas of potential risk that may remain unconsidered.
Baseline Survey

The baseline noise environment was determined via a long-term, unattended noise survey spanning
Tuesday 13th to Thursday 15th June 2017, although the end date is erroneously quoted as Thursday
17th June 2017, within the report.
Figure AS9808/SP1 of the submitted noise report identifies the location of the Proposed Development, closest receptor (1 & 2 Railey Mews), denoted as 'Receptor A' and the baseline noise
measurement location, denoted as 'Monitor A'. It should be noted that the position of Monitor A is to
the west of the substantial massing of the pitched roof factory building associated with the Proposed Development and entirely screened from Receptor A. It would appear that the Monitor A
position has a direct line of sight to the A400 road to the west of the site. Receptor A is entirely
screened from this potential source of noise.
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The selection of the measurement position is justified within Section 2.0 of the report by the statement "A suitable monitoring location was not available on the eastern elevation of the building". While this may well have been the case for a longer term, unattended measurement, it
would most certainly not have been the case for a shorter duration, attended survey, as Railey Mews
is a public road.
In such circumstances, it is suggested that a shorter duration, attended set of measurements at the
actual location of the closest noise-sensitive receptor would be preferable to, and more representative than, an unattended measurement at a proxy receptor location, which is exposed to a

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different set of noise sources.
Moreover, no specific details of the measurement position have been included in the report, discussing the potential constraints such as whether the measurements were undertaken under freefield
or façade-field conditions. There are also no photographs of the measurement position included in the report.
Consequently, it is felt that the baseline sound measurement methodology may have been steered
by preferable logistics rather than technical correctness and could be compromised, as a result.
Furthermore, it is considered that a validation measurement exercise, which considers the baseline
environment at the northern façade of 1 & 2 Railey Mews, should be carried out to provide absolute
certainty that the baseline acoustic environment at the potentially most affected receptor location is
being considered.
Furthermore, meteorological data was not recorded during the baseline survey, and no evidence or
source is provided to backup the assertion that “The weather during the survey was dry with light
winds, which made the conditions suitable for the measurement of environmental noise”. Online
records held at Weather Underground1 indicate that average wind speeds reached 4.4 ms-1
, with
maximum wind speeds of 10.8 ms-1
, and wind speed gusts to 15.8 ms-1 during 15th June in the area.
Table 3.2 of the report, which is referred to in the text as “Table 4.2”, presents the spectral background noise measurement results for both the daytime and night-time periods of the survey.
The heading of Table 3.2 asserts that the results are “Minimum L90 linear spectral levels”; however,
the table itself asserts that the levels are A-weighted (LA90). It is assumed that this section of the
report is merely stricken with typographic errors, rather than technical ones; however, confirmation
should be sought from the report author as to what exactly is being presented.
Assessment Approach

Appendix B of the report sets out the calculation sheets for predicting the sound levels incident
upon the closest receptor.
It would appear from inspecting these calculations, that the noise sources have been considered

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individually as point sources, with distance losses, louvre insertion losses and barrier attenuation
losses applied individually, with the cumulative level logarithmically summed at the end of the
calculation. While this technique is fairly standard and not challenged for plant operating in an
isolated manner, in the open air, it is considered to be technically incorrect for the assessment of
noise breakout from a plant room.
1
https://www.wunderground.com/history/airport/EGLC/2017/6/15/DailyHistory.html?req_city=London+City&req
_state=&req_statename=United+Kingdom&reqdb.zip=00000&reqdb.magic=104&reqdb.wmo=WEGLC
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Although the plant room is proposed to be roofed by a continuous acoustic louvre, the space
behind it will be, to a degree, reverberant, with the louvre would considered as absorbent, and the
calculation should have predicted an internal reverberant level within the plant room, with the noise
breakout considered as a single or series of rooftop planar sources, which would have very different
attenuation rates, both in terms of distance and any screening losses, to the point sources considered.
As the roof of the Proposed Development is currently, and is proposed to be, pitched, this would
elevate the noise source location (emitting to the environment) above the parapet wall of the
application building, which would significantly reduce any screening losses afforded by the parapet
wall. The predicted screening losses, which are apparently calculated using the Maekawa Method on
the basis of point sources, although not explicitly stated in the report, would simply not occur in
reality.
Furthermore, no allowance appears to be made within the calculations for acoustic reflections
arising as a result of the presence of the larger building to the west. Although, the direct sound field
attributable to the eastern pitch of the louvered roof will no doubt be the dominant source at the
receptor and the potential reflector comprises a pitched roof, which will reduce the significance of
that component further, some evidence of consideration of the potential for reflections from

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the
building to the west would be expected.
Other Considerations

The report considers the potential for environmental noise effects, only; however, there are other
potential acoustic impacts that should be considered before a determination of the acoustic suitability of the proposals can be made. These are:
Vibration
The Proposed Development is physically connected to the closest receptor at 1 & 2 Railey Mews,
with, as discussed above, the proposed mezzanine floor intended to accommodate the plant,
directly connected to the party wall.
Plant of this type, in particular, rotational plant, has the potential to generate vibration, especially
during the powering up and powering down cycles, when resonant frequencies may be approached.
This effect has the potential to be significantly greater where plant items are mounted on a suspended structure, which does not benefit from mass isolation to the same degree as would be
experienced if mounted at ground floor level.
Consequently, the potential for vibration transfer through the structure and into the adjacent receptor property should be appropriately considered, with suggested design specifications for antivibration
mounts, or similar, proposed accordingly.
Façade Breakout
No assessment of façade breakout through the east wall of the Proposed Development has been
undertaken.
The east wall of the development, which fronts onto Railey Mews and is directly adjacent to the
front (north) façade of 1 & 2 Railey Mews, contains a large, single-glazed window and a steel, rollershutter
door, neither of which will offer significant acoustic attenuation performances.
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Consequently, the likely effects and any upgrade requirements as a result of noise breakout through
this façade should also be fully considered, as this has the potential to be acoustically significant at
the closest noise-sensitive receptors.
Direct, Structure-Borne and Re-Radiated Sound Transfer
As discussed, the Proposed Development shares a party wall with 1 & 2 Railey Mews and the
acoustic performance of this party wall should be appropriately considered, as a significant

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source
of noise is to be proposed on the application side of it. There is significant potential for audible
levels of sound transfer through the party wall, especially when considering the low-frequency bias
of the generated noise, which may adversely affect the residential amenity of the neighbouring
property. This effect could be significantly exacerbated should any degree of re-radiation occur,
which typically occurs at low frequencies.
Re-radiated noise and structure borne noise should also be considered in relation to the common
elements between the source and receptor locations. The assessed plant items will be directly fixed
to a floor, which provides a direct transmission path through the structure, into the adjacent
property, yet this is not only not assessed, but is not even considered in the report, which is a
significant omission.
It is considered that the acoustic performance of the existing party wall should be obtained, via a
diagnostic sound test, and the potential for sound transfer through this wall appropriately assessed.
Furthermore, the potential for structure-borne noise and vibration transfer should also be fully
considered and assessed, with the design tailored appropriately. This may involve the specification
of additional sound insulation to the party wall and the separation/isolation of all common structural
elements, in order to prevent acoustic transfer into the adjacent receptor.
Summary

The noise assessment report produced by Clarke Saunders Associates for the Proposed Development has been considered both in terms of its technical correctness, relating to what has
been considered, and areas that should have been considered, but have not.
The assessment approach adopted is considered to be flawed; both in terms of the baseline survey
methodology and noise prediction methodology, resulting in the significant potential for environmental noise impacts to be much higher at the closest noise-sensitive receptor than those
presented within the report.
The assessment has also not considered other potentially significant means of acoustic transfer to
the adjoining receptor at 1 & 2 Railey Mews, meaning that the impact upon their residential amenity

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					has not been fully considered. Consequently, it is felt that the noise assessment report does not fully assess the potential acoustic effects upon sensitive receptors in the vicinity and should not be considered sufficient to support a grant of planning permission for the Proposed Development. Before such a decision can be made, the noise assessment report should be revised, as advised above, and expanded to consider the other potential avenues for acoustic impact, with appropriate mitigation measures set out, where necessary. 17-398/28-34 Fortess Road, London/Technical Review 5 Neil Morgan MSc MIOA Principal Acoustic Consultant T: 020 7183 8565 M: 07478 677800 E: neil@inacoustic.co.uk