Your Ref: 2018/2004/P
By email to: planning@camden.gov.uk

[redacted]

FAO Matthias Gentet
Planning Solutions Team
Development Management
London Borough of Camden
Town Hall
Judd Street
WC1H 8ND

28 August 2018

Dear Mr Gentet

Re: Planning Application 2018/2004/P - Public House 4 Conway Street, W1T 6BB
Restated Objection to the Application as proposed.

Further to our letter of 11 August 2018 and in the light of the Applicant's responses and reissue of its Noise Impact Assessment P18-171-R01v3 (the acoustic report) we would restate our objection to the Application as set out below.

Objection to the Application

1. We object to the Application as it is not compliant with the Camden Local Plan criteria and is likely to severely impact the amenity of residential neighbours. We submit that the correct assessment of noise levels is as follows:

Predicted Noise Levels at County House Residential Window	**DAY-TIME**		**NIGHT-TIME**	
With Mitigation	**Report Table 5**	**Correct Analysis**	**Report Table 6**	**Correct Analysis**
Description	dB(A)	dB(A)	dB(A)	dB(A)
Condensers - level at residence window (dB LAeq)	32	**47**	32	**47**
New Kitchen ventilation - level at residence window (dB LAeq)	37	**42**	**	**42**
Total emission level at residence window (dB LAeq)	38	**48**	32	**48**
Lowest background noise level (dB $L_{A90,15mins}$)	48	**48**	44	**44**
Comparison (dB LAeq - dB L_{A90})	-10	**+0**	-12	**+4**

** Explanation given is that the Kitchen extract fan will not be running at night

2. It is apparent that the noise at our windows from the proposed equipment is predicted to exceed by 4 dB(A) the night-time background level measured by the Applicant. The predicted day-time noise level is the same as the background level.
3. The acoustic report maintains that the kitchen ventilation equipment will not be running at night (ie. after 23:00). This assertion is supported by the results of the 2-day acoustic survey conducted in April 2018. However, this fails to take into account the Applicant's proposal to extend its trading hours and to expand its restaurant offering for which a new Premises Licence (see Annex D) was granted in June 2018. We submit that it is therefore more than likely that the kitchen ventilation equipment will be operated after 23:00. The predicted noise from this equipment must therefore be taken into account for in the night-time period.

4. The following is a summary of the noise calculations. This compares the analysis contained in the acoustic report and, we submit, the corrected analysis which is calculated on the same basis.

Predicted Noise Levels at County House Residential Window			
SUMMARY (see Annex C for full details) Description	**Acoustic Report** dB(A)	**Correct Analysis** dB(A)	Comments
Condensers (4Nr.)	76	76	Manufacturer's data, as Acoustic Report.
Distance attenuation	-29	-27	Basis as Report but separately calculated for each condenser to 1 metre from window (see Annex B).
Reflecting plane behind source	0	+3	Adjust for Source is not free-field - external wall behind equipment (see Annex B).
Reflection at sound sensitive facade	0	+3	Standard acoustic correction
Condensers without mitigation	47	55	
Barrier attenuation	-15	-8	Basis as Report but separately calculated for each condenser (see Annex B).
Condensers with mitigation	32	**47**	
New Kitchen ventilation (Outlet and Inlet)	83	83	Manufacturer's data, as Acoustic Report.
Distance attenuation	-30	-28	Basis as Report but re-calculated to 1 metre from window (see Annex A).
Reflection at sound sensitive facade	0	+3	Standard acoustic correction
Kitchen ventilation without mitigation	53	58	
Duct attenuation	-16	-16	Basis as Report
Kitchen ventilation with mitigation	37	**42**	
Total noise level at window	38	**48**	

5. The Applicant responded (email 15 August) to paragraph 1.1 in our previous letter as follows:
   "We have re-measured the distance to the nearest flat. This is 11 metres from the proposed condensers and 13 metres from the proposed kitchen ventilation louvers. The revised noise assessment issued last week uses these values."
6. We submit that these distances are inaccurate. We have measured the distance on the ground between the nearest corner of the roof terrace (the proposed location of the condensers) and the line of our windows. This is 7.2 metres by tape measure. We have measured the length of the roof terrace as 3.9 metres. Using these measurements we have marked-up the Applicant's drawing 3175/36B (see Annex A) and calculated the distances to each of the 6 items of equipment.
7. These distances are reduced by 1 metre in the noise attenuation calculations in order to predict the attenuation at 1 metre from the window, in accordance with the Camden Local Plan 2017 Appendix 3 Noise Thresholds.
8. The condensers are located in front of a brick external wall. Therefore, as the noise source is not free field condition our corrected analysis includes 3dB to account for a reflecting plane behind this equipment. Annex B shows a typical section which demonstrates this.
9. We understand that an acoustic correction of 3dB for noise reflection at the facade is standard practice. Our corrected analysis therefore takes account of this.

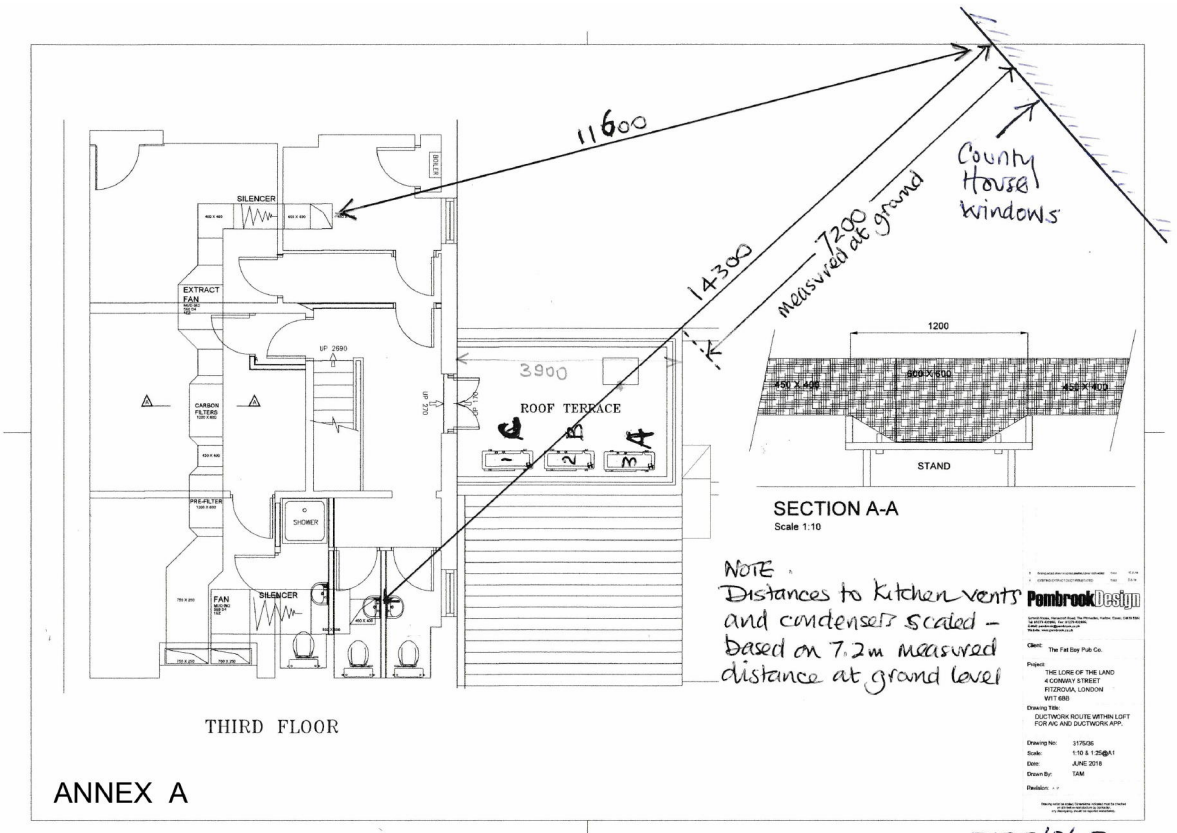
10. The acoustic report includes, on the last page, a barrier calculation which arrives at an attenuation values for the condensers. The calculation places the noise source at the finished roof level. This is not correct as the height of the condensers is 990mm. The acoustic report also recommends (paragraph 4.11) that the equipment be mounted on vibration isolation mounts. We submit that 600mm should be used as the height of the noise source above finished roof level. We have recalculated the barrier attenuation for each condenser, using the data shown in Annex B. Our attenuation results are included in the noise calculations in Annex C.
11. We would note that the 'corrected' noise calculations are for our windows in County House. As previously explained, the windows of 6 Conway Street are closer to the equipment.
12. We would expect that your environmental consultee will be able to confirm the above.

In conclusion, the proposed location of mechanical plant so close to residential windows is not appropriate and will adversely affect amenity as the noise intensity levels exceed the Camden Local Plan criteria. We would ask that grant of the Application be refused.

Yours sincerely

David Hart MRICS

Enc: Annex A – Plan 3175/36B marked-up for distances
Annex B – Section (to scale) and barrier attenuation data
Annex C – Noise Calculations table
Annex D – Premises Licence for the Lore of the Land

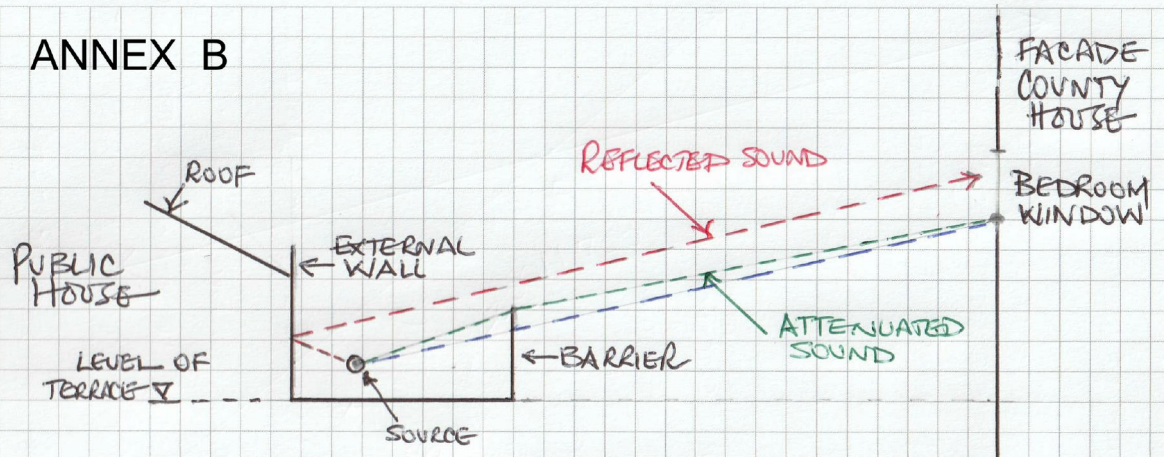


THIRD FLOOR

ANNEX A

3175/36 B

ANNEX B



SECTION THROUGH SOUND PATH FROM SOURCE (CONDENSER C) ON TERRACE/ROOF

Barrier Attenuation Data	d (S-B)	d (B-R)	**d (S-B-R)**	d (SBR)	d (SR)	a	b	c	Path Diff
h Source = 7.6m (0.6m above roof level)									
h Receiver = 10.0m									
h Barrier = 1.5m									
Condenser A	1.1	8.1	**9.1**	9.6	9.4	1.4	8.2	9.4	0.2
Condenser B	2.4	7.4	**9.8**	10.1	10.1	2.5	7.6	10.1	0.0
Condenser C	2.7	8.1	**10.7**	11.0	11.0	2.8	8.2	11.0	0.0
Freezer Condenser	1.2	7.4	**8.6**	9.1	8.9	1.5	7.6	8.9	0.1
as Report P18-171-R01v3 (h Source = 7.0m)	1.0	10.0	**11.0**	11.9	11.4	1.8	10.1	11.4	0.5

Noise Calculations

on same basis as Noise Impact Assessment P18-171-R01v3

Description	63	125	250	500	1k	2k	4k	8k	dB(A)	Comments
Kitchen Outlet Lw	67	69	73	75	74	71	66	59		Manufacturer's data
Duct attenuator	-1	-4	-13	-18	-17	-15	-13	-8		
Duct losses	0	0	0	0	0	0	0	0		Negligible
Louvre area	2	2	2	2	2	2	2	2		
End reflections	-4	-1	0	0	0	0	0	0		Woods Practical Guide to Noise Control, Fig 5.7
Louvre directivity	1.5	1.5	1.5	1.5	1	1	0	0		SRL Noise Control in Building Services, Fig 11.2
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Distance attenuation	-28	-28	-28	-28	-28	-28	-28	-28		12 metres, less 1m from source and 1m from facade
Resulting SPL from duct outlet	**41**	**43**	**39**	**36**	**35**	**34**	**30**	**28**	**41**	
Kitchen Inlet Lw	65	67	71	73	72	69	64	57		Manufacturer's data
Duct attenuator	-1	-4	-13	-18	-17	-15	-13	-8		
Duct losses	0	0	0	0	0	0	0	0		Negligible
Louvre area	2	2	2	2	2	2	2	2		
End reflections	-4	-1	0	0	0	0	0	0		Woods Practical Guide to Noise Control, Fig 5.7
Louvre directivity	1.5	1.5	1.5	1.5	1	1	0	0		SRL Noise Control in Building Services, Fig 11.2
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Distance attenuation	-30	-30	-30	-30	-30	-30	-30	-30		14 metres, less 1m from source and 1m from facade
Resulting SPL from duct inlet	**37**	**39**	**35**	**32**	**31**	**30**	**26**	**24**	**37**	
Kitchen supply fan case breakout Lw	50	51	56	58	57	54	49	42		Manufacturer's data
Kitchen extract fan case breakout Lw	50	51	56	58	57	54	49	42		
Total kitchen fan case breakout Lw	53	54	59	61	60	57	52	45		
Roof attenuation	-7	-11	-16	-23	-23	-24	-24	-27		Measured data for tiled slate roof
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Distance attenuation	-30	-30	-30	-30	-30	-30	-30	-30		14 metres, less 1m from facade
Resulting SPL from case breakout	**19**	**16**	**16**	**11**	**10**	**6**	**1**	**-9**	**15**	
Condenser A Lw	76	73	72	69	61	56	59	53	70	Manufacturer's data
Reflecting plane behind source	3	3	3	3	3	3	3	3		Brick wall - source not free-field
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Barrier attenuation	-6	-7	-9	-11	-13	-16	-19	-22		See Annex C
Distance attenuation	-26	-26	-26	-26	-26	-26	-26	-26		9 metres distance, less 1m from facade
Resulting SPL from condenser A	50	46	43	38	28	20	20	11	39	
Condenser B Lw	76	73	72	69	61	56	59	53	70	Manufacturer's data
Reflecting plane behind source	3	3	3	3	3	3	3	3		Brick wall - source not free-field
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Barrier attenuation	-5	-5	-6	-6	-8	-9	-12	-14		See Annex C
Distance attenuation	-27	-27	-27	-27	-27	-27	-27	-27		10 metres distance, less 1m from facade
Resulting SPL from condenser B	50	47	45	42	32	26	26	18	42	
Condenser C Lw	73	72	71	71	64	57	59	54	71	Manufacturer's data
Reflecting plane behind source	3	3	3	3	3	3	3	3		Brick wall - source not free-field
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Barrier attenuation	-5	-5	-6	-6	-7	-9	-11	-14		See Annex C
Distance attenuation	-28	-28	-28	-28	-28	-28	-28	-28		11 metres distance, less 1m from facade
Resulting SPL from condenser C	46	45	43	43	35	26	26	18	42	
Freezer condenser Lw	58	56	62	62	62	60	55	50	66	NB No manufacturer's data has been provided
Reflecting plane behind source	3	3	3	3	3	3	3	3		Brick wall - source not free-field
Reflection at sound sensitive facade	3	3	3	3	3	3	3	3		Standard acoustic correction
Barrier attenuation	-6	-7	-8	0	-12	-15	-18	-21		See Annex C
Distance attenuation	-26	-26	-26	-26	-26	-26	-26	-26		9 metres distance, less 1m from facade
Resulting SPL from freezer condenser	32	29	34	42	30	25	17	9	40	
Resulting SPL from condensers	**54**	**51**	**49**	**47**	**38**	**31**	**30**	**22**	**47**	
Total resulting SPL	**54**	**51**	**49**	**48**	**40**	**37**	**34**	**30**	**48**	

ANNEX C

Camden

Public licensing register

New search Advanced search

Licence application details #APP\PREMISES-NEW\089244

Overview | Documents (3) | Related licences | Activity and times (5)

Conditions

Related activities

Granted opening hours for Opening:	Monday: 10:00 - 00:00 Tuesday: 10:00 - 00:00 Wednesday: 10:00 - 00:00 Thursday: 10:00 - 00:00 Friday: 10:00 - 00:30 Saturday: 10:00 - 00:30 Sunday: 11:00 - 23:00
Granted opening hours for Live Music:	Monday: 10:00 - 23:30 Tuesday: 10:00 - 23:30 Wednesday: 10:00 - 23:30 Thursday: 10:00 - 23:30 Friday: 10:00 - 00:00 Saturday: 10:00 - 00:00 Sunday: 11:00 - 22:30
Granted opening hours for Recorded Music:	Monday: 10:00 - 23:30 Tuesday: 10:00 - 23:30 Wednesday: 10:00 - 23:30 Thursday: 10:00 - 23:30 Friday: 10:00 - 00:00 Saturday: 10:00 - 00:00 Sunday: 11:00 - 22:30
Granted opening hours for Late Night Refreshment:	Monday: 23:00 - 23:30 Tuesday: 23:00 - 23:30 Wednesday: 23:00 - 23:30 Thursday: 23:00 - 23:30 Friday: 23:00 - 00:00 Saturday: 23:00 - 00:00
Alcohol hours applied for:	Monday: 10:00 - 23:30 Tuesday: 10:00 - 23:30 Wednesday: 10:00 - 23:30 Thursday: 10:00 - 23:30 Friday: 10:00 - 00:00 Saturday: 10:00 - 00:00 Sunday: 11:00 - 22:30

ANNEX D

Camden

Public licensing register

New search Advanced search

Licence application details #APP\PREMISES-NEW\089244

Overview | Documents (3) | Related licences | Activity and times (5) | Conditions

Licence application detail

Make a representation form

Application reference:	APP\PREMISES-NEW\089244
Premises name:	Lore of the Land (previously the Lukin)
Premises address:	4 Conway Street London W1T 6BB
Ward:	Bloomsbury
Status:	Application Approved
Correspondence Address :	Lisa Sharkey
Designated Premise Supervisor :	Helen Towsey
Applicant:	Mitchells & Butlers Leisure Retail Limited
Application type:	Premises - New Licence
Application date:	01/05/2018
Last date for representation:	29/05/2018
Committee hearing date:	No information available
Date of temporary event:	
Objections received:	Yes
Granted/Refused date:	No information available
Expiry date:	No information available