

**Application No:** 2021/2813/P  
**Consultees Name:** Susan Zur-Szpiro  
**Received:** 28/07/2021 16:04:38  
**Comment:** OBJ

I/We are the residents/owners of 231 Goldhurst Terrace (Susan and Michael Zur-Szpiro) which is next door to where the heat pump would be placed if this application is approved.

I/We have read the planning application 2021/2813/P and have the following objections:

1. The movement of the Heat Pump will increase sound levels in our garden which we use on a regular basis. The use of an arbitrary 5m and 10m range from the exterior of our house to decide that the noise is unacceptable as we use our entire garden regularly. If there is noise from a heat pump this will severely impact our ability to enjoy our property. Furthermore, we have an adult aged son who is severely disabled with multiple impairments and serious health problems. We use the back of our garden for physical purposes as we have a daily physiotherapy programme for him to work on his gross motor and fine motor impairments. We have adult sized 'play' equipment that he can access with full time support. He also has a diagnosis of autism and is highly noise sensitive including a diagnosis of Hyperacusis which means over sensitive hearing, so noises are amplified for him and cause great distress. The ongoing building works are very disturbing for him, indeed for our entire family and has been reducing the time that we are able to use our garden, especially the play/therapy equipment, all of which are situated at the bottom of the garden. For our son to maintain his emotional equilibrium he needs his surroundings to be calm, and to keep all environmental noise to a minimum.

I have a hearing condition too called Misophonia that cause agitation to repetitive and uninterrupted noise, so the application to remove the heat pump from the roof of the building to behind our properties fills me with horror, and illustrates the ongoing disregard for the level of imposition, intrusion, interference, distress, and more that our household is suffering, as well as that of neighbouring households on Goldhurst Terrace, from the beginning of the projection's inception, due to lack of communication by Camden to affected, bordering households. I also am suffering greatly from the impact of having caught Covid-19 in March 2020 and suffering from Long Covid ever since ie 16 months so far and ongoing including non stop headaches, dizziness, brain fog, massive fatigue, gross motor problems with muscle and nerve pain and the garden is one of the only places I can walk as concrete paths cause too much pain, despite being on very high pain killer medication.

I have read and concur with the objection raised by my immediate next door neighbours Anna Kogan Nasser and Hussein Nasser at 233 Goldhurst Terrace as well as the technical objections raised by Mr H G Sugiura, the reference provided below in point 2.

I could produce my own objections additional to the major health and disability factors outlined above but given that the objections and rational mirror my own I insist that my objection to the proposed re-siting express our own objections, so I will not waste time and energy making the same points but in altered wording.

2. I would echo the objection of Mr H G Sugiura, which can be found here: <http://camdocs.camden.gov.uk/HPRMWebDrawer/Record/9122099/file/document?inline> that the methodology used to "calculate" the noise even at these arbitrary points is outdated and therefore useless (point 5 in his complaint).

3. Furthermore, the calculations with respect to ambient noise have no basis as at no point has anyone

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from RBA Acoustic entered my property to measure the ambient sound. Therefore, the whole report and its "calculations" cannot be relied upon.

Given that this is the basis upon which the whole planning application is based and we have shown that it's completely not based on any real observations I struggle to see how this application can be approved.

4. As Mr. Sugiura also says in his complaint it is disingenuous to say that night time noise will be significantly less due to day time operation of the building unless the planning permissions specifically prohibit night time use AND more specifically prohibits the operation of the heat pumps at night.

5. As Mr Sugiura also puts it in his complaint (which we echo) "Noise emission levels from the reselection of the proposed roof level plant particularly low frequency tonal noise is likely to give rise to significant adverse impact on the health and quality of life of residents external and internal amenity". I would also add that people using the Health Centre will also be impacted by this given they are closer. Why anyone would want children in a creche to be subject to this noise is baffling.

It is for these reasons that we object to this planning application and would like the original design to hold or at the very least, more mitigation measures put in place to eliminate the noise in our garden.

Points raised by Mr Sugiura below

1st June 2021

prepared by RBA Acoustics.

A re-selection/re-design as detailed in the Technical note 'Plant Noise Revision' shows how far away the first estimate was pre-determination.

The points of concern relate to potential significant adverse noise impact and comments are below:

1. No BS 4142:2014 Methods for rating and assessing industrial and commercial sound assessment has been done.
2. There is no basis to claim that the emission criteria are compliant with Policy A4 of the 2017 Local Plan.
3. Section 2 statement "in line with..." has NO VALUE; Therefore, noise criteria in use are mere conjecture until supported.
4. Section 3 para 3.3 Tonality of the plant is said to be absent. Using a 1/1 octave analysis is equivalent to not looking for it. Tonality needs a 1/3 octave spectrum. This is not a sustainable argument and this is made more significant when combined with the absence of a BS 4142 assessment.
5. Section 4 Plant Noise Calculations are too simplistic. The calculation method for predicting noise levels from the proposed plant at the nearest residential windows (-20 log R and DI theta) are free-field corrections. An urban environment was free field 20 years ago. Today, we have a much better understanding from modern design aids to account for the built environment (i.e. not free-field). This again is made more significant in the absence of a BS 4142 assessment.
6. An argument that night noise is somehow less significant because the building is not used at night has value only if the planning permission restricts night-time operation.
7. It is far from unusual that the Pre-determination of the original planning application the building requirements of air handling system (total pressure estimated, preliminary fan selection, budget & space allocations made) started out with an over optimistic view which was also the lowest cost. Air handling system total pressure increase is a circular argument.
8. Reselection of the air handling system (pressures calculated, increases the fan size required, bigger

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ductwork, higher velocity) has resulted in a new fan sound power level spectrum.

9. The proposed mitigation by fitting attenuators to the atmospheric terminations of both air handling units (AHUs) will result in the total pressure increasing again... increase fan size / operating speed / new fan sound power level. This needs to be reported AFTER the attenuation is selected.

In conclusion the RBA Acoustic Technical report is flawed and therefore cannot be relied on.

Noise emission levels from the reselection of the proposed roof level plant particularly low frequency tonal noise is likely to give rise to significant adverse impact on the health and quality of life of residents external and internal amenity.

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