



Dear David

With reference to your letter dated 5th July 2021 on behalf of my brother who is a Resident I wish to make a representation on his behalf and as joint owners of Flat A 241 Goldhurst Terrace NW6 3EP on the Section 73 application.

This stems from reading and reviewing the content of the Technical note 'Plant Noise Revision' dated 1 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 the potential significant adverse noise impact and my comments are summarised 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 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.

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.

I would be grateful if you would bring this to the attention of the Design Team as I do not agree with the revised changes for above reasons and the conclusions in RBA Acoustics Technical note.

I have today submitted this written representation to your Planning Portal.

Regards

Michael Sugiura CEng MIOA MSc(Tec) BSc(Hons)