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Dear Lucy

ASI3926 BROCKWELL PARK, LONDON**Initial Opinion**

Further to your instructions, I have reviewed the documentation provided, namely the EventLambeth Guidance for Control of Sound at Outdoor Events 2016 (the Guidance) and 2no. post-event reports (2023 and 2024, respectively) issued by the acoustic consultancy Vanguardia as examples of noise management records.

This letter presents my initial opinion on the matter following my review of the documentation.

The Guidance sets out maximum music noise levels (MNL) that should be observed at “*any noise sensitive premises*” for up to 8no. major events in the five key Parks and Open spaces of the London Borough of Lambeth, as well as providing a map of monitoring locations for Brockwell Park.

No justification appears to be presented for the noise level limit values or for the required monitoring locations. In fact, if interpreted literally, the marker for “Location 4; R/o 56 Dulwich Road” is placed at the front of a house, which depending on the height of the monitoring microphone, lends itself to being significantly screened by the house itself from the event noise within the park, despite “R/o” presumably indicating the position should be to the rear.

The risk around this ambiguity is that noise levels measured closer to ground level, at these distances from the source, are likely to be attenuated by “*obstacles on the surface, such as buildings, trees and hills, etc.*” as described in both exemplified Vanguardia post-event reports (section 2.5). Therefore, without a more detailed monitoring prescription, a significant uncertainty would exist regarding the representation of local residences through the measured data. Details of measurement conditions are not included in the exemplified 2023 and 2024 post-event noise reports.

Furthermore, the seemingly arbitrary monitoring locations are generally in conflict with the noise limits which are said to apply to “any noise sensitive premises.” I would expect that an effective monitoring strategy would require a supplementary, bespoke monitoring plan for every event based on stage locations and PA dispersal which targets nearest and most affected noise sensitive receptors.

By example, cursory searches online have returned event layouts for previous events, which regularly demonstrate a main stage location near to the corner of Norwood Road and Dulwich Road, as indicated in Figure 1.



Figure 1: Indicative location plan

The nearest monitoring location required by the Guidance is indicated by the green circle 'Location 1,' whereas the nearest residential receptors are along the yellow dotted line, within 80m of the stage right flank where the nearest major PA placement can be anticipated. For reference Location 1 is circa 175m away from the same assumed PA location. Though analysis of the difference in noise levels between the receptors on the yellow line and Location 1 may be more complicated than application of a simple distance differential, levels along the yellow line have the potential to be considerably higher than those at Location 1 thus introducing another layer of uncertainty to the system, which can result in exceedances of the noise limits.

The 2023 post event report does represent a schedule of measured noise levels measured around the park. The figures reported appear to be unreliable, however, with one impossibly low value having been reported as 10.7 dB(A) measured at 14:27 on 27 May. The value of the results shown is also undermined by the lack of any specific location plan referencing the numerous measurement locations that are generally just referred to by road name. It is unclear to what extent the resultant uncertainty has been considered or addressed.

The event monitoring and post event reporting requirements provide an opportunity to demonstrably deliver an agreed level of protection to the community against disturbance from event noise. The reporting requirements, including a protocol for reporting all noise measurements and the locations at which they were measured, as well as details of all complaints logged and the responses to those complaints, should be a fundamental element that the local authority insists on being observed by event organisers and their consultants. Consistency in delivery of this information from year to year also enables the process to be refined and tracked. The differences in the post monitoring reports for 2023 and 2024 that I have reviewed, one detailing tabulating (but not precisely locating) additional measurements, that is not seen in the other, and the other showing a breakdown of complaints, not followed through from the previous year, does not provide for these essential elements.

In my considered opinion, the shortcomings of the EventLambeth Guidance for Control of Sound at Outdoor Events 2016 in its current form allows significant flexibility in event noise management thereby failing to ensure the intended protection for the local community. The current process should not form the basis of future event noise management protocols, therefore, which need to be more prescriptive, and more closely defined to deliver consistent protection to neighbouring residents.

Yours sincerely
for CLARKE SAUNDERS ACOUSTICS

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