

Experience

1. I confirm that I am a company director of Vanguardia Limited, a company specialising in the field of leisure and entertainment. I have over 35 years experience as a consultant in the field of acoustics. I am a Fellow of the Institute of Acoustics, Chairman of the London Branch of the Institute and was awarded the Institutes Tyndall Medal for my contribution to entertainment acoustics. I have a wide range of experience in all technical aspects related to acoustics, noise and vibration and have project managed numerous innovative projects as well as presenting evidence at legal proceedings, public inquiries and at several House of Commons Select Committees. I have presented over 30 technical papers nationally and internationally on noise and acoustics mainly dealing with noise management from entertainment. Over the last 25 years I have had direct personal and overall management responsibility for advising local authorities, venue owners, event organisers and private individuals on the setting of noise limits; and the monitoring and management of noise impact for pop concerts at more than 1000 such events.
2. I sat on the Noise Council Working Party for the Code of Practice on Environmental Noise Control at Concerts (1995) (The Pop Code) and my research papers were used to develop the noise guidelines presented in this publication.
3. I have more recently been appointed to new working parties which has been formed to refresh the Pop Code and assess noise from other licensed premises.

Instruction

4. I have been instructed by AEG Presents Limited to provide independent acoustic advice in respect of the Licence application for the All Points East events planned for Victoria Park in 2018. In particular, I have been asked to review the letter of objection (dated 12 January 2018) from Tower Hamlets and Hackney councillors and to provide comments as appropriate.

Experience with events at Victoria Park

5. I have extensive experience of music events at Victoria Park having provided noise management at the majority of the shows since 2002 which was the start of the Lovebox event.

Review of the Councillors Letter dated 12 January 18

6. The councillors letter raises 4 items to their objection to the premises licence namely:-
 - (1) Reduction of the licence period from 5 years to 1 year.
 - (2) Reduction of the Music Noise Level (MNL) from 75dB(A) to 70 dB(A)
 - (3) The request for a separate bass limit
 - (4) A reduction in the mid-week minor events terminal hour from 2200 hours to 2130 hours.
7. I will deal with items (2) and (3) which are directly related to my experience in dealing with sound and noise from events. I will also comment on item (4). I understand the promoter, AEG, will also deal with the other two points (1) and (4).

Reduction in the off-site MNL noise limit from 75dB to 70dB

8. A reduction in the off-site noise level has two impacts on the successful operation of music shows at Victoria Park.
 - (1) Firstly, to meet a reduced off-site MNL of 70DB(A) would mean that the LAeq noise on-site at the respective stages would have to be controlled to levels of the order of 92dB(A) to 93dB(A) depending on location (ie 5dB(A) lower than current levels). This would render the music event an ineffective form of entertainment for the audience as levels below 95dB(A) are recognised as being too low to provide audience satisfaction. This point is documented in the Noise Council Code of Practice for Pop Concerts ¹ (Pop Code) which confirms that *levels below 95 dB(A) will be unlikely to provide satisfactory entertainment for the audience*.
 - (2) The limit of 75dB(A) was based on the limit specified in the Pop Code and is adopted at many other parks and open spaces in the UK such as Hyde Park

¹ Noise Council :Code of Practice on the environmental noise control at concerts, 1995

and Clapham Common to name several comparable London venues. A full list of venues and their associated noise limits are given in my Appendix 1. The frequent use of 75dB(A) is evident. If events at Victoria Park were forced to have a lower limit of 70dB(A) then this would severely dis-advantage Victoria Parks ability to attract acts and hence provide entertainment when compared to other open spaces in London.

The Request for a Bass Noise Limit

9. There are several aspects that need to be considered before recommending a bass limit.

(1) Firstly, research into the assessment of disturbance from music noise was completed on behalf of the Government department DEFRA². The research reviewed 17 different noise parameters, some felt to be better than others to assess the low frequency bass beat but in summary it was concluded that the ***'best overall prediction of subjective ratings was the Absolute LAeq'***. I was part of the research team and can confirm that all types of music were assessed from guitar orientated 'rock' music to electronic dance music both which exhibit heavy bass beats. This research confirms that the LAeq index **does** measure and assess low frequency bass and weights its significance based on human response. It is not therefore necessary to derive new indices to assess low frequency bass.

(2) Whilst some venues have a low frequency limit, many still operate satisfactorily without such a limit as shown in Appendix 1. They ALL use the LAeq index as the main driver to manage noise from music. The optimum way to control excessive low frequency noise is from within the venue and a new control system called Metrao is now being adopted to control low frequency sound in real-time. This system has been successfully trialled in Hyde Park in recent years and AEG has confirmed that this system will be implemented at Victoria Park for this years events.

² NANR163: Noise from Pubs and Clubs (Phase II) May 2006

Reduction in the mid-week Terminal Hour

10. From the perspective of the management of music noise and prevention of public nuisance, there is no justification for the reduction of the mid-week terminal hour from 2200 hrs to 2130 hrs. I am confident that the music noise levels can be managed between 2130 and 2200 so that no noise nuisance will be caused.

Summary

11. The lowering of the LAeq noise limit from 75dB to 70dB would mean that the reduced music levels inside the park would not provide an effective form of entertainment for patrons and therefore music events of any scale would not take place in Victoria Park.

12. There is no need to adopt an additional low frequency bass limit as Government research has shown that the LAeq alone is the best descriptor to assess modern day music.

13. The best way to manage low frequency sound is from control systems within the venue and a new real-time system (Metrao) has been successfully adopted at Hyde Park and will be implemented at Victoria Park this year.

14. In conclusion, therefore, I do not consider it is necessary to change the noise conditions that already exist for Victoria Park especially as they are generally in line with other parks and open-air spaces used for music events in the UK.

Jim Griffiths

Director

Vanguardia

Date _____

Appendix 1 – Noise limits at other Parks and open space venues

Venue	Number of Concert Days per Year	Licence Condition	Additional Information
London			
Hyde Park	6 in 2017	75dBLAeq,5min, measured 1m from the façade of any noise sensitive premises	8 Event days permitted
Trafalgar Square	40 events with amplified music	75dBLAeq,5min, measured 1m from the façade of any noise sensitive premises	No low frequency limit
Clapham Common	4 approx	75dB(A), 15 min	Additional Low Frequency Limit
Alexandra Palace Park	Licence grante in 2017 for 75dBLAeq,15min for 3 events, 65dBLAeq,15min for 4 events and 55dBLAeq,15min for 23 events		
Brockwell Park	Unknown	Varies between 58-70dBLAeq,15min depending on monitoring location	Additional Low Frequency Limit
Regents Park	Unknown	Varies between 64-69dBLAeq,15min depending on monitoring location	Low frequency assessed but no limit set
Other UK Venues			
Platt Fields	2 in 2012	Not to cause a nuisance. A limit of 75dBLAeq,15min measured 1m from the façade of any noise sensitive premises has been adopted for the event	No Low frequency limit
Bestival	3	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises until 0000hrs	No Low frequency limit
Isle of Wight Festival	3	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises until 0000hrs	No Low frequency limit
V Festival Telford	3	70dBLAeq,15min measured 1m from the façade of any noise sensitive premises	Limit increased from 65dBLAeq,15min from previous events
Heaton Park, Manchester	2 in 2017	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No Low frequency limit

Reading Festival	3	68dBLAeq,15min (70dBLAeq,15min for last 2 acts each day) measured 1m from the façade of any noise sensitive premises	Limit increased from 65dBLAeq,15min from previous events
Milton Keynes National Bowl	3 in 2014	75dBLAeq,15min measured 1m from the façade of any noise sensitive property	Low frequency limit removed from previous events
Godiva Festival, Coventry	3	70dBLAeq,15min (68dBLAeq,15min on Sunday) measured 1m from the façade of any noise sensitive premises	Limit increased from 65/60dBLAeq,15min from previous events
Mercedes Benz World, Weybridge	3	70dBLAeq,15min at the nearest noise sensitive premises	No Low frequency limit
South Park, Oxford	2 in 2017	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No low frequency limit
Bellahouston Park, Glasgow	1 in 2017, up to 3 days in previous years	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No low frequency limit
Glasgow Green	3 in 2017	75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No low frequency limit
Warwick Castle	Approx 3	70dBLAeq,1min measured 1m from the façade of any noise sensitive premises	No low frequency limit
Roundhay Park, Leeds		75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No low frequency limit
Moor Park, Preston		75dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No Low frequency limit

One off Events

The Den, Teignmouth	2	84dBLAeq,15min measured 1m from the façade of any noise sensitive premises	No Low frequency limit
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