

Highbury Community Association

Mr. Paul Ricketts
Planning Officer
London Borough of Islington
Municipal Offices
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This matter is being dealt with by: Roger Wright
Committee Member for Planning
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27th March, 2013

Subject: Objection to application P2013/0392/FUL – Additional events at Ashburton Grove Stadium – Arsenal Football Club

Dear Mr. Ricketts,

Highbury Community Association objects to this application. We ask that Islington Council rejects this application based on the following five reasons:

1. The limit on non-football events was approved by LBI Planning Committee as part of the original Planning Brief for the Arsenal Relocation Scheme back on 17th April, 2000. It was not included in the original draft, but was added as a result of consultation. The limit was subsequently incorporated into the conditions of the Planning approval for Ashburton Grove issued on 3rd May 2002.

AFC have not provided any information that is significantly different from or in addition to the kind that they supplied in support of their original application. So there is no reason for the Council to vary the limit.

2. The entire Arsenal Re-location Scheme has so far been governed by the original Planning Brief agreed by the Council in 2000. This application is beyond the scope of the brief and would represent a significant departure from it. Therefore the application should be refused.
3. The noise and disturbance from the additional events will have a considerable effect on the quality of life of the affected residents, of whom there are more than before.

When the Condition limiting the number of events was approved, Council Officers gave the following reason in support of the limit: "In order to safeguard the amenities of near-by residential occupiers" [Conditions AG26 & AG27, 30/05/02]. AFC's own submission shows that the number of residents affected by the noise and disturbance has increased markedly since the original approval, largely due to AFC's own building programme, so more, rather than fewer residents now need to have their amenities safeguarded [AFC Environmental Statement 6.3.1]. As such, the application should be rejected.

4. AFC's own submission allows it to be calculated that the noise nuisance produced by the additional concerts will have a rating of "Extreme Adverse" on the semantic descriptor scales which categorise the degree of the predicted noise impact for a given noise change, as described in the application. Given such a dramatic impact on residents, this application should be rejected. The calculation of this is given below.

In the Planning Permission Grant document for the Ashburton Grove site, council officers stated that it would be necessary to install a range of mitigation measures in and around the stadium before it "may be possible to permit all forms of musical entertainment", with only "certain forms of musical entertainment that are viable at relatively lower music noise levels may be permissible with the present design" [Condition AG20, 30/05/02].

Not one of these measures, nor any other mitigation measures, have ever been implemented even in support of the current number of events. More events should certainly not be permitted, given this.

5. The National Planning Policy Framework requires applications to support "Sustainable Development". This is defined as meaning that economic, social and environmental gains will result from any approved scheme [NPPF p.21 March 2012].

This application provides no evidence at all addressing any of these three requirements. As such, it cannot be determined to be "sustainable" as required under the NPPF and so should be rejected.

We consider that each of these points taken individually provides sufficient reason to reject the application. Taken together, they provide an overwhelming case for rejecting it.

However, should the Council be minded to approve the application, we propose that an additional condition be attached, to the effect that no major non-football event may be permitted in the stadium during the same seven day period in which a major event takes place in Finsbury Park or on Highbury Fields. We leave the definition of such an event to the drafting skills of officers. The reason for the condition would be the protection of the amenities of residents.

In conclusion, we repeat our opposition to this application and ask that it be rejected.

Yours sincerely,



Roger P Wright, CEng, FIET,
For Highbury Community Association

Appendix

Calculation of noise levels

AFC do not provide actual figures for the levels of noise measured inside and around the stadium during the concerts held so far. This is a surprising omission.

They do state that a level of about 100dBA has been measured inside Wembley Stadium during music events [Environmental Statement table 5.6]; that a level of 85 plus 15 (i.e. 100, but not specifically stated to be so)dBA has been experienced inside the Arsenal stadium during the concerts so far and that any level lower than this (i.e. 100dBA) "would not provide any audience enjoyment or satisfaction so the concerts would not be viable" [Environmental Statement 5.4.17].

The Environmental Statement then presents an analysis of what noise level would be experienced inside the stadium if a level of disturbance of "moderate adverse" noise impact were found outside the stadium (specifically at a point in Hornsey Road). This level is 85dBA inside the stadium [Environmental Statement 5.4.17].

The analysis is based on assuming a background level of noise of 45dBA at this point outside the stadium. HCA have undertaken background noise level measurements at several points in and around the stadium and agree that 45dBA is a reasonable background level.

However, if one reworks the calculation to determine the noise levels at this location outside the stadium when the noise level stated as necessary for a "viable concert" of 100dBA is achieved inside the stadium, the figure for the noise level at this point may be determined to be 75dBA, on the same scale.

A 75dBA level in contrast to the 45dBA background level represents a difference of 30dBA which equates to an "Extreme Adverse" impact on the semantic descriptor scales which categorise the degree of the predicted noise impact for a given noise change, as described in the application.

Since this is such a significant result, we wonder why the applicant did not undertake this calculation themselves.

Technical Note

Many experiments and mathematical models demonstrate that the relationship between a change in the sound level at a source position and the change in sound level at a measurement point some distance away is a linear (i.e. proportional) relationship.

As an example, suppose there is a sound source with a 100dBA level and that there is a measurement point some distance away where the sound level is 50dBA. If the source sound level is increased to 200dBA, the sound level at the measurement point will be found to have increased to 100dBA. Similarly, if the source sound level is reduced to 50dBA, the sound level at the measurement point will be found to have reduced to 25dBA.

It is this relationship that allows the sound levels in Hornsey Street during a concert to be calculated as above, based on the information provided in the Environmental Statement.