

Dealt with by: Environmental Health

Our Ref: SMD/2021/0330

Direct Dial: (01538) 395400

Your Ref: SMD/2021/0330

Email: EHealth.Consultation@highpeak.gov.uk

Date: 13th July 2021

MEMORANDUM: PLANNING CONSULTATION
--

LOCATION

**Alton Towers Farley Lane
Farley**

PROPOSED DEVELOPMENT

Installation of a seasonal temporary stage

Potential Areas of Environmental Concern -

1. Amplified Music and speech
2. Increase in total noise emissions from AT

General Comments

The application is accompanied with a noise assessment (Cahill Design Consultants April 2021 document ref. P1484/April21) which concludes that the proposal will comply with the Code of practice on concerts and outdoor music events and mitigation will further negate impacts. The assessment seems to indicate compliance with this COP will mean no adverse impacts to noise sensitive receptors.

The Environmental Health Department do not agree with the conclusions of the assessment and have the opinion the proposal will cause adverse impacts to the nearest noise sensitive properties.

The existing noise climate in the area includes impacts such as public road traffic noise, Alton Towers road traffic noise and theme park noise (ride, ambient ride music and operational noise). The current noise emitted from the park operations causes intermittent complaint to the Council. Typically the complaints relate to ride noise and ambient background noise caused by small speakers located around the park. These complaints are generally managed through good on site management and interaction by site managers with the local community. On account of these complaints monitoring by the Council has also been undertaken, noise from the current park operations has not been found to significantly exceed background levels and so no formal action has been required to date.

These proposed concerts will cause a new type of noise impact due to the nature of the sound (amplified concert music and voice) and the high maximum levels of that noise. Based on our experience there will be an increase in noise complaint both to the Council and the Alton Towers

resort. The levels predicted will cause significant short term increases in background noise, this will happen during the proposed 6-10 shows per day. The nature of this noise will be significantly different to that which occurs during normal operation of the park. The complaints about music noise at present we believe would intensify and increase after the introduction of this music stage as proposed.

The report submitted uses the Noise Council – Code of Practice (COP) on Environmental Noise Control at Concerts to assess the predicted impacts (no other relevant standard available). The assessment predicts general compliance with the COP criteria levels which allows for a 15db increase over background sound levels (15 minute measurement period). The criteria levels are based on a maximum of 12 outdoor events per year. This concert stage will be used significantly more than that even accounting for no use during most of winter and on rainy days. The COP makes note where there are 30 ‘indoor concerts’ per year then noise impacts should not exceed background by 5db over a 15 minute period. These events will be outside so there is an argument to require that music noise should not exceed or be below background levels. Based on the predictions in table 3 of the noise assessment this will not be achievable at this location. In our opinion the compliance with the COP levels alone are not justification for a concert stage to operate 262 days per year.

The assessment does not really consider the relevance of 262 days per year when this stage could be used. Even allowing for 50% usage this would mean 131 concert days per year. The code of practice sets out limits based on a maximum of 12 events per year which we believe is indicative of a proposed maximum for outdoor concerts with amplified sound when residential properties might be impacted. The stage would be likely used during the summer months and especially during school holidays when residents should be able to enjoy gardens.

The mitigation proposed does not address noise caused by people possibly singing along, shouting by individual entertainers to generate atmosphere or performers increasing sound levels to improve quality especially for bigger crowds. The ability for the park management to maintain good quality sound from the stage and prevent increases in noise at the receptors will be limited.

The overall noise caused by the park when operating (on season) compared to off season would also increase which does not seem to have been addressed or considered by the assessment. The introduction of this stage is adding another commercial noise source to those already existing and will add to a steady increase in noise levels in the area.

In summary the proposed concert stage and events will cause significant increases in noise levels already coming from the park and will cause adverse impacts to the nearest noise sensitive properties in the vicinity. The nature of and the maximum sound levels of the amplified noise will cause adverse impact to amenity and lead to an increase in noise complaints. There is currently a delicate balance maintained in the area of Alton where it is expected the park will generate a certain level and type of noise in its day to day operation, residents will expect certain types of park noise. The amenity of this general rural area is also protected by seasonal and limited night time use of the park. The introduction of this stage may compromise that balance. The COP is based on 12 events per calendar year and not 262 days usage so although a useful indicative it is not a valid justification for the development.

Recommendation – The Environmental Health Department recommend refusal on the grounds that residential amenity would be adversely impacted and the likelihood there would be an increase in overall sound levels in the vicinity of the park.

Advisory Note/ Informative:

Please be aware that the responsibility for safe development and secure occupancy of the site rests with the developer.

The granting of planning permission does not in any way indemnify against statutory nuisance action being taken should substantiated complaints within the remit of part III of the Environmental Protection Act 1990 be received.

Regards,

Environmental Health