

obj 1.

Licensing

From: patricia [REDACTED]
Sent: 10 April 2019 20:39
To: Licensing
Subject: Fw: Licence for alcohol consumption

Licensing team
Lewisham Council

Ref Eastbrook Funk Ltd NAKED CITY JAZZ FESTIVAL licensing application

Dear Sirs,

As a resident of Beckenham Place Park I wish to object to the alcohol licence application by Eastbrook Funk Limited, trading at Zone E Beckenham place park, Beckenham Hill Road, to supply alcohol for consumption on the premises on the last Saturday of July (annually), during their Live Music festival for up to 6000 people.

~~The park is not in a rural setting, but surrounded by a densely populated area and enormous amounts of traffic in all adjacent roads.~~

The interest of the residents of Beckenham Place Park road is greater than the general public's because the road is very narrow, and leads directly to the park gates. As there is very limited parking capacity in the neighbourhood, it can be assumed that most spectators will use public transport, making BPP road the access of choice.

The supply of alcohol from 12.00 to 22.30 will necessarily subject local residents to antisocial behaviour and noise, which is contrary to the licensing objective to prevent public nuisance.

Residents of Beckenham Hill road, where the other gate is located, and the adjacent Southend road and Westgate road will also be badly affected, particularly at the time people leave the park.

~~Though they misleadingly call the event a Jazz festival, which implies a more moderate audience, their promotion sites cite explicitly that the music performed will span all genres, including electronic music, which attracts an altogether more 'lively' public.~~

I hope you will consider more than 10 hours alcohol consumption inadequate

Yours sincerely
Patricia [REDACTED]
[REDACTED]
Beckenham Place Park
07557642268

1911
1912
1913

1914
1915

1916
1917
1918
1919
1920
1921
1922
1923
1924
1925
1926
1927
1928
1929
1930

1931
1932
1933
1934
1935
1936
1937
1938
1939
1940
1941
1942
1943
1944
1945
1946
1947
1948
1949
1950

1951
1952
1953
1954
1955
1956
1957
1958
1959
1960

obj 2 .

Licensing

From: Penny [redacted] <[redacted]>
Sent: 16 April 2019 17:51
To: Licensing
Subject: Licensing application by Eastbrook Fund

Naked City Jazz Festival Zone E Beckenham Place Park Beckenham Hill Road BR3 5BS
New Application Particulars of Application Applied for:

A Jazz festival to take place on the last Saturday of July yearly. Ticketed event - Capacity 7,000

Regulated entertainment Films Live Music Recorded Music Performance of Dance Anything of a similar description to live music, recorded music or performance of dance

Alcohol For consumption on the premises

12:00 – 22:30 hours for all activities

21st April 2019

Dear Sirs,

As residents of Beckenham Place Park, we wish to oppose the licensing application above made by Eastbrook Funk Ltd. Trading at Zone E Beckenham Place Park BR35BS for Naked City, to supply alcohol for consumption on the premises on the last Saturday of July annually for a capacity of 7000 people from 12.00 noon to 10.30 pm.

Beckenham Place Park is in the middle of a densely populated residential area. Have all of these many thousands of properties been notified individually of this event and the alcohol license hours requested? What notices have been displayed? The public in this area must be made aware of such a huge event in order to protect their families by avoiding the area on a day of potential public nuisance. We are assuming that this huge event will be policed by the Metropolitan Police?

Alcohol available for such a long period i.e. ten and a half hours, will inevitably lead to:-

- 1) Crime and disorder
- 2) Public nuisance
- 3) Drugs, drunkenness and lewd behaviour

What measures are being taken to deal with these problems?

There are no age limits so children will be at the event and exposed to the effects of alcohol for such a long period with concerns for their safety. Any license should be granted for the evening only.

The only way ticket holders can leave the event is via residential roads, and residents, in particular children, will be exposed to possible drunkenness, vandalism and unsociable behaviour. We are concerned for our safety.

We strongly object to a license for this length of time, and it should not be ongoing until experience of holding an event of this size in this area has been experienced.

Penny and [redacted]
Beckenham

obj 3.

Licensing

From: Alfred [REDACTED]
Sent: 28 April 2019 20:20
To: Licensing
Subject: Naked City Jazz Festival: Beckenham Place Park

Dear Sir/ Madam

I should like to object to the proposed licence for the Naked City Jazz Festival in Beckenham Place Park on the 27th July.

The objection is for the following reasons;

~~1. Lack of Relevant Planning Permission~~

- The existing planning permission for the redevelopment of Beckenham Place Park only covered medium sized events (up to 4,000). The event is scheduled for 7,000 and is not covered by the existing planning permission.
- The existing planning permission for Beckenham Place Park has no provision for ticketed events which restrict access to the park.

Given the above approval of the event would violate the current planning permissions and could be subject to an injunction resulting in financial loss to the Council for its negligence.

2. Disturbance to Local Residents

- The event will cause days of disturbance to local residents as well as disturbance late into the night on Saturday 27th.
- There is inadequate parking at the location or on local roads for any such event of this size rendering the inconvenience intolerable and unreasonable.
- The event itself is for a licence for 10.5 hours thus encouraging anti-social behaviour through excessive drinking.
- The late finish means many will be walking the streets late into the night and quite possibly have missed any public transport home.

~~3. Damage to the Park~~

- The location selected (Zone E) is adjacent to ancient woodland and totally unsuited for an event of this kind. This number of people will result in irreparable damage to highly protected woodland.
- The late finish will encourage many simply to spend the night in the park resulting in further damage to the delicate environment and anti-social behaviour and littering.
- The location, away from the main road will mean a great deal of damage to the park in setting up stages equipment etc as there are no access roads to the site.

4. Health and Safety

- Sunset is at 20:56 on July 27th. There is no lighting in the park (or planning permission for it) whilst providing it would cause further damage. It is clearly totally irresponsible to hold an event in the middle of the park when dark which it will inevitably be at 10 30 PM and after.
- The park now has a lake which the event is adjacent to. Needless to say, people drinking all day, darkness and lake in the way of leaving, clearly a disaster waiting to happen for which the council could be held negligent.

- The site is totally unsuited for access by the emergency services as it is away from the access road.

I therefore trust that the application will be rejected and Lewisham Council will instead seek to preserve the park rather than vandalise it as proposed. The rejection will also also render unnecessary and further action to stop it.

Thank you

Alfred ~~XXXX~~

obj 4.

Licensing

From: Paul [REDACTED]
Sent: 26 April 2019 17:47
To: Licensing
Cc: nick.a.gerry@met.pnn.police.uk; MARKOS.G.Shakides@met.pnn.police.uk; Mitchell, Lucy; Stephen, Cllr Wells; Zip Mail Ltd; Zsanett Ashcroft
Subject: Objection to Naked City License

Dear Licensing Team

RE: Naked City Jazz Festival - Premises Licence

As residents of Beckenham Place Park road (my address is Keelson Lodge, Beckenham Place Park), we wish to object to the application for sale of alcohol at the above event and the recurring nature of the application for the following reasons:

1. Protecting children from harm.

BPP is a road of family homes, with many young children living here. At previous events held in the park, even on a small scale, we have witnessed drunken and lewd behaviour during and after such event. Most recently, in the late evening on Friday 5th April, following a small music event at the Manor, a group of approximately 16-18 youths exited the park on to BPP and engaged in fighting and throwing traffic cones at each other. The police were called but were unable to attend. These incidents cause distress to the residents and if escalated / increased in size would be significant problem in such a small road and residential area. A music concert is also likely to encourage drug taking and alcohol abuse, which the children on the road should not come into contact with.

2. Crime and disorder

As above, we are concerned that without properly security in place for the duration of the event and until after all the people have dispersed we are likely to see an increase in crime and disorder in BPP - damage to our property, or even threats to our personal safety - there are many elderly people also living in BPP road. We have witnessed this at previous events (such as the one above) and the park has not seen anything of the size and scale proposed (some 6000 people) at the event in July. There has been no track record in successfully marshalling such an event.

3. Public Safety and Nuisance

This is a very large music event - with prominent musicians and DJs. We understand that the organisers have so far secured 21 bands spanning all genres, and expect an audience of up to 6000 people. Therefore with alcohol (and no doubt drugs involved) the event is highly likely to compromise safety of those attending and also the surrounding neighbours to the event - especially with the length of time (over 10 hours) that alcohol will be served. This doesn't include people bringing their own drinks of course. We are afraid of damage to our property, damage to the environment here within BPP (and within the park itself), reduced access to our property during the event, noise and litter. BPP is an unadopted highway and the residents are responsible for their frontage and verges - which are accessible to the public.

If the license is granted for this first event (with or without alcohol), it is imperative that the licensees ensure that provide proper security and marshalling before, during and after the event - to minimise the issues mentioned above - including at a minimum:

- Marshals on the corner of BPP and Southend Road to redirect attendees to the Beckenham Hill entrance
- Security: staff present until everyone has dispersed
- Rubbish collection

Enforcement of no parking on BPP road

Regarding the ongoing (annual) nature of the licence application. We strongly object to this and suggest that a several more events of this size need to be carried out under a TEN to discover just what the impact is of the above, BEFORE, a licence change is agreed. We believe it is reasonable for the licence authority to show none of the above criteria are adversely impacted.

Paul and Zsanett ~~xxxxxx~~
Keelson Lodge, BPP

LONDON BOROUGH OF EBBWASTON
LICENSING ACT 2003
NOTICE OF APPLICATION FOR
NEW/VARIATION OF A PREMISES LICENCE

DATE: 20/10/2011

NOTICE IS GIVEN THAT I HAVE APPLIED TO THE LOCAL AUTHORITY FOR A NEW/VARIATION OF A PREMISES LICENCE FOR THE PURPOSES OF:

Trading as a bar, pub, nightclub, restaurant, etc. (specify the premises)

has applied to the Local Authority for a NEW licence since

no other licence is held for the premises

For the purposes of the Licensing Act 2003 (Section 100(1)(b))

My name is: [redacted]
Address: [redacted]
Postcode: [redacted]
Tel: [redacted]
E-mail: [redacted]

Licensing Authority	Mon		Tue		Wed		Thur		Fri		Sat		Sun	
	Day	Period	Day	Period	Day	Period	Day	Period	Day	Period	Day	Period	Day	Period
1. Public Order														
2. Noise														
3. Traffic														
4. Safety														
5. Other														

It is requested that you advise me of any objections to the proposed licence within 28 days of the date of publication of this notice.

I hereby declare that the information provided in this application is true and correct.

Signature: [redacted]
Date: 20/10/2011

obj 5.

Objection
to the
Premises Licence Application for 'Zone E' in Beckenham Place Park
made by
Naked City Jazz Festival (company name: Eastbrook Funk Ltd)

Premises licence application notice date: 2nd April 2019
for up to 7,000 persons for
Alcohol consumption on the premises & Regulated Entertainment
(Recorded music, Films, Performance of Plays & Live Music)
12.00 – 22.30 on the Last Saturday of July (Annually)
at
Zone E, Beckenham Place Park, Beckenham Hill Rd BR3 5BS



Objection submitted by: Nick ~~Boy~~

Local resident & park-lover

~~Beckenham Hill Rd~~, Beckenham, Kent ~~BR3 5BS~~

Objection date: 29th April 2019

(Version 1.0 – 29.4.19)

(This page is intentionally blank)

Contents	Page
1. Introduction	
1.1 Dual nature of this objection – To Licensing and to The Mayor & Council	1
2. Objections in Licensing terms (the four Licensing objectives)	2
2.1 Licensing Objective 'a': The prevention of crime and disorder	2
2.2 Licensing Objective 'b': Public safety	3
2.2.1 High density of public in a small space	
2.2.2 Safety of public egress or emergency access	
2.3 Licensing Objective 'c': The prevention of public nuisance	4
2.3.1 Nuisance from Setting up, Performance and De-rigging over 9 days	
2.3.2 Nuisance from the festival event day	
2.3.3 Public nuisance from parking, crowds and attendee behaviour beyond the park	4
2.4 Licensing Objective 'd': The protection of children from harm	5
3 General objections to the Council as park owner and manager	6 - 8
3.1 Major commercial exploitation of the park	
3.2 Personal introduction	
3.3 Material interests and wider objections for this exploitation of BPP	
4 Applicants' Documents and other appendices	9
4.1 Public notices	
4.2 Other appendices	
5 Conclusion	10
Appendices	
A – Naked City site notice 2 April 2019 – JPEG – 158 KB	
B – BPP Zone Map 14 May 2018 – JPEG – 969 KB	
C – location photo Naked City Festival – JPEG – 633 KB	
D – BPP Ancient Woodland Map – Natural England web site – JPEG – 246 KB	
E – BPP Local Nature Reserve listing – English Nature web site – JPEG – 250 KB	
F – BPP LNR map – English Nature web site – JPEG – 283 KB	
G – BPP LNR park sign – PDF – 617 KB	
H - Residents circular BPP Naked City April 2019 – JPEG – 580 KB	
<i>(NB there was only one page, not two as suggested)</i>	

(This page is intentionally blank)

1. Introduction

1.1 Dual nature of this objection – To Licensing and to The Mayor & Council

I write to formally object to the proposed new Premises Licence for Zone E of Beckenham Place Park for alcohol consumption and regulated entertainment of recorded and live music etc for up to 7,000 persons, annually, on the last day of July.

(Zone E is an unspoilt grassy hilly clearing, south-east of the inner curve of the new lake, and bounded by mature woodland on the other three sides, including ancient woodland)

To the Licensing Office: This objection is sent formally to the Licensing Office according to the narrow 'Four objectives' of the Licensing Act 2003. I ask that this application is refused on grounds conflicting with these objectives.

To the Mayor & Councillors of Lewisham Council: As this is also an application for a public park and local nature reserve owned and managed by Lewisham Council, I also object on wider principles to the Mayor and Councillors of Lewisham Borough.

I request that the Council does not invite or agree with other parties park exploitation for large commercial uses to the detriment of general public access and quiet enjoyment of the park and nature.

I request that the Council withdraws its offer of any part of the park for such uses, including the proposed 'Naked City Festival' annual use.

2. Objections in Licensing terms (the four Licensing objectives)

I am concerned about, and object to the breaches or contraventions I fear regarding:

2.1 Licensing Objective 'a': The prevention of crime and disorder

I am concerned that this objective will not be served by holding an annual open air music performance event in the middle of public parkland for up to 7,000 persons (at any one time) with the provision and consumption of alcohol.

I am concerned that a large gathering of this nature may have accompanying it criminal and disorderly activities which may include:

- 2.1.1 Disturbing the peace via noise and rowdiness for park users and adjoining residents
- 2.1.2 Attempted gate-crashing and resulting confrontation, into the festival site
- 2.1.3 Bringing in and use of drugs, to the festival site and to the park generally
- 2.1.4 Bringing in of weapons eg. knives to the festival site and to the park generally
- 2.1.5 Fighting
- 2.1.6 Damage to parkland grass, trees, vegetation, paths and park infrastructure, including newly-installed features funded by a £5m Heritage Lottery Fund grant
- 2.1.7 Disturbance to wildlife including protected species including badgers and bats

These are not unfounded or unprecedented concerns.

A recent Mutiny Music Festival in Portsmouth was stopped after its first day after two drug-related deaths.

In Finsbury Park, BBC London News has shown film of confrontation between police and gate-crashers forcing entry through the high perimeter fence at a recent music festival.

In Brockwell Park there was damage to park infrastructure.

At the annual Lewisham People's Day in Mountsfield Park, it is necessary to close off adjoining residential roads, have hired security guards with knife-wands and knife-arches at all entrances, with a substantial police presence including a crane-mounted camera and an occasional police helicopter.

2.2 Licensing Objective 'b': Public safety

I object on my belief that many of the concerns I raise under 'Objective 'a"' above will also affect public safety.

In addition I am concerned that a large gathering of people in a small and probably enclosed space will be unsafe.

I expand on overcrowding and access below:

2.2.1 High density of public in a small space

The original park-wide licensing application for 5 zones of 14th May 2018 was for a total of 5,000 persons – in the whole park. This is an application for up to 7,000 persons in a single zone. Zones C, D and E are small zones.

Based on the park zone plan of the 14th May 2018 application, which included marked distances, I estimate that the irregularly-shaped woodland clearing of Zone E, adjoining the inner curve of the new lake, is approximately 10,500 sq.m.

Not accounting for festival infrastructure, dividing c.10,500 sq.m by 7,000 persons gives just about 1.5 sq.m space per person.

There will likely be space taken for stages, loudspeakers, artists' accommodation, back-stage space and storage, generators, food and drink stalls, toilets, circulation paths etc. Internet publicity refers to 21 bands and 3 stages.

If festival infrastructure occupies, say, one eighth of the arena, that would take up around 1,313 sq.m. It would leave around 9,188 sq.m for the (up to) 7,000 concert goers or around 1.32 sq.m space each.

I regard that having up to 7,000 persons in small Zone E is a danger to public safety from crushing or in the event of an emergency, injury, trampling or death.

2.2.2 Safety of public egress or emergency access

In the event of an incident or emergency, Zone E is near the middle of a large park. Apart from the probable event fencing, the Zone has dense woodland on three sides and a new lake on the fourth (northern) side.

I fear that it will be difficult and unsafe to evacuate the site in the event of an emergency.

For emergency services access, the festival site is a long or meandering way from park entrances and public highways. Most paths are in the region of at most 3m wide. Those on the eastern side of the railway (which bisects the park) are in poor condition being cracked or uneven old tarmac paths.

They are principally pedestrian paths catering for informal park users. The nearest escape path to the North East of the proposed festival site is a brick bridge over the railway. The surface of that route, which is vehicular, is broken and muddy.

The park paths are for low-frequency informal pedestrian park visitors. They are not designed for large scale use of up to 7,000 persons at the end of the event, or for emergency evacuation.

The narrowness of the paths means that, in the event of an incident or emergency, there will likely be a dangerous conflict and congestion between leaving festival-goers and attending and departing emergency services.

2.3 Licensing Objective 'c': The prevention of public nuisance

I am concerned and object on this ground as follows:

2.3.1 Nuisance from Setting up, Performance and De-rigging over 9 days

An organiser's flier to nearby residents states that the event will make an intrusion into the park for 9 days comprising 4 build days, the festival day, and 4 de-rigging days, with 12 hours daily site working from 8am-8pm and the festival taking place from noon to 10.30pm which is 10 and a half hours plus earlier sound checks.

The setup and de-rigging will likely involve numerous large vehicular movements. These would be to transport a large perimeter of fencing (and 10-foot high panels have been used at other events), temporary roadway meshing, staging, lights, sound, power, cabling, water, toilets, food and drink stalls and their wares.

The access is only via normal park paths, predominantly pedestrian, frequently of no more than 3m width, tarmacked or of earth or mud. Trees with low branches prone to damage, adjoin access paths. Lawn edges liable to damage adjoin paths.

Regarding the erection and dismantling of the Festival, I regard the movement and potential damage from vehicles to be a public nuisance in a public park.

2.3.2 Nuisance from the festival event day

Regarding the actual event, I object regarding my concerns from nuisance from music and PA systems noise emanating from the arena. Web publicity refers to 3 stages and 21 bands.

I consider the Premises application notice description of the event as being a 'Jazz Festival' to be wholly at odds with what is being advertised online.

The phrase 'Jazz Festival' suggests to me something low key, perhaps little-amplified, mostly acoustic genteel quartets aka Acker Bilk, Louis Armstrong etc.

The Evening Standard online description is: 'jazz, house, disco, drum'n'bass and beyond'. It suggests a wider variety, volume and different character of event. The only performer name I recognise from the 1980's is Neneh Cherry, whose pop hit 'Buffalo Girls' I would not describe as Jazz.

In my opinion, I consider that the phrase used in the application has been chosen to downplay the size, intensity and character of the event to attract less opposition and more likelihood of permission being granted.

Different genres of music attract different audiences.

Irrespective of what the style of music is, I anticipate, and object to, the intrusion of potentially loud music, possibly several stages concurrently, into the quiet ambience of Beckenham Place Park and disturbing residential amenity beyond. Bass notes seem to extend beyond the treble melody line.

I anticipate a nuisance from large crowds crossing the park and gathering in a small space and leaving in larger numbers in a short time towards darkness. I fear there may be intrusion, damage and disturbance into the park, nature and wildlife which will affect the enjoyment of the park on the day and possibly result in lasting damage thereafter.

There has been around 2 years of HLF-funded park works, described as restoration based on a c.1870 plan of the Cator Estate. A single day's event may damage or destroy parts of those works, or the centuries of establishment of the landscape and its natural habitats.

At the time of writing the HLF works are not yet even complete.

2.3.3 Public nuisance from parking, crowds and attendee behaviour beyond the park

Park project management comments suggest that there will be no parking provision within the park for the event – so any audience parking will be on-street.

If only 1 person in 10, of the up-to-7,000 people, comes by car (700 people), with say 2 persons per car, that would be 350 cars.

If half the audience (3,500) come by car, at the same 2-per car occupancy, that would require 1,750 car parking spaces.

I object to what I would anticipate as being a nuisance to residents, local businesses, the travelling public etc from massive on-street parking and congestion around the park.

Local roads are already heavily congested or near grid-lock, including on a Saturday.

I also fear that from pedestrian festival-goers travelling to and from the event, where alcohol is sold in an excited atmosphere, there may be ill-effects of rowdyism, litter, damage etc.

2.4 Licensing Objective 'd': The protection of children from harm

Many of my concerns in the above three categories also have potential ill-effects regarding this Licensing Objective too.

3 General objections to the Council as park owner and manager

3.1 Major commercial exploitation of the park

This section comprises information and requests to the Mayor and Council beyond the narrow formal 4 licensing objections.

This is not an application for which the Council is simply a disinterested actor in its statutory regulatory licensing role.

The Council is land owner, custodian and responsible manager, on behalf of the public, of Beckenham Place Park, arguably the borough's greatest environment asset.

I presume a decision has been taken by one, or a very few number of Council Staff, Contractors or Councillors to host major commercial events in the park. The first was a 5-zone park-wide licence for 365 days a year for up to 5,000 persons. (Application of 14.5.18)

The very first event announced breaches the 5,000-person limit for the whole park, by applying for an event up to 7,000 in one of the smaller three zones.

It is entirely within the remit, and, I suggest, the duty, of the Council not to invite or host major commercial events in Beckenham Place Park which are at odds with the ethos of public parks in general, or of BPP's unique countryside character in Lewisham Borough.

I suggest to the Mayor and Council that the practice in general, and in particular of this event, be ceased of commercially exploiting Beckenham Place Park to the detriment of its quiet enjoyment by peaceable park users and lovers of nature.

I give some background below.

3.2 Personal introduction

I have lived nearly all my life here, about a mile from the park, and have known and enjoyed it since my childhood in the 1960's.

In November 1991 Lewisham Council commenced another scheme for the 'disposal' by 99-year lease, of three quarters of Beckenham Place Park to a commercial leisure operator, David Lloyd Leisure.

The deal involved major built development in the park of a 36-bay, two-tier floodlit golf driving range, adjoining the 18th Century listed Mansion, and a David Lloyd private indoor tennis centre, resembling a collection of tall retail 'sheds', in Summerhouse Field adjoining the River Ravensbourne.

I joined with others to oppose these 'sale' and development proposals. After about two years and an independent Public Inquiry, the planning application was refused as inappropriate built development on Metropolitan Open Land (MOL), which for inner London large open spaces, has the same protection against inappropriate development, as the Metropolitan Green Belt.

The campaign group, the Save Beckenham Place Park Campaign became the Friends of Beckenham Place Park. I have been involved in matters, large and small, regarding the park, along with many others, over these last 28 years.

In this case, this is an individual objection.

I will move on to the context of the park and its protections.

3.3 Material interests and wider objections for this exploitation of BPP

It appears to me that if not brought to the authority's attention, many material matters relating to BPP may be detrimentally affected above and beyond a narrow reading of the 4 licensing objectives.

The Council, as co-operator with the applicant, has scope, and indeed I suggest, a duty of care for consideration and action on more aspects and concerns about its proposals for BPP.

In short this is more than a pub or club premises licence application by another party. It is an application, and perhaps the first of many, for:

- (a) **the largest (240 acre) park in the borough;**
- (b) **arguably its greatest environmental asset;**
- (c) **a registered Local Nature Reserve (by the Council itself on 13.12.05);**
- (d) **a park containing woodland, including ancient woodland (unbuilt on for 400 years or more), and the River Ravensbourne;**
- (e) **Green Chain land on three arms of the Green Chain Walk;**
- (f) **a park containing the Listed Buildings of the Mansion (c. 1760 – listed Grade II* - 'two star') and the Homesteads (stable block and 5 cottages) listed Grade II;**
- (g) **a former estate acquired by resolution of the London County Council (LCC) in 1927 and opened as a public park in 1929.**

The minute of 31st May 1927 of the LCC Parks and Open Spaces Committee included:

"We were of the opinion that from the point of view not merely of the present, but also of the prospective requirements of the district, the existing natural features of Beckenham Place Park should be preserved and arrangements made, if possible, for the provision, for the use of the public, of such a valuable addition to the amenities of the neighbourhood. In view, moreover, of the development which was proceeding in certain parts of the neighbouring areas, we came to the conclusion that the opportunity should not be lost of ensuring that a naturally fine estate would be unbuilt upon for all time."

- (h) **In planning terms it is Metropolitan Open Land – open space within London of significance to more than one borough. It has the same protection against inappropriate (harmful) development as the Metropolitan Green Belt.**

A section, including the Mansion, that was formerly within the L B of Bromley, is a Conservation Area (buildings and landscape)

- (i) **The park was awarded and is nearing completion of a two-year £5m Heritage Lottery Fund grant scheme. It is mainly based on a restoration of the parkland to that of the former Cator Estate from a c.1870 historical plan.**
- (j) **Park privatisation and private exploitation - Closing parts of the park for private commercial events (including setup and dismantling time) amounts to privatising public open space and denying the public access to the enclosed areas, and spoiling their enjoyment outside from loud music etc. This includes areas for wedding receptions, private functions etc.**
- (k) **Traffic and parking - There are problems with traffic and parking now. I object to exacerbating these with licensing for major commercial events.**
- (l) **Fire and other emergency services safety - Even small events at the Mansion, or day-to-day in normal park use, see overflow parking onto the narrow spine road between the Beckenham Hill Station vehicle entrance and the Mansion. Even with stewards this has been difficult to control. It may be that the Fire Brigade can 'bump' a car out of the way in an emergency wasting 'only' a minute, say. With major events it will not be possible to 'bump' 50 cars on the spine road out of the way. Even a minute lost can be critical.**

- (m) **Impact on the landscape** - Major events require the setting up of heavy staging, fencing (up to 10 feet high to keep out non-ticket-holders), etc. This is delivered on lorries. This will have an adverse impact on paths and the landscape.
Even a trial mountain-biking event on the lawns outside the Mansion, of only 4 hours, resulted in damage to the green landscape with brown wheel paths scars for 3 months.
- (n) **Loss of general public enjoyment** - This event would be a public nuisance to the enjoyment of the park by people just coming to enjoy greenery, sunshine and fresh air.
- (o) **Ticket prices** – internet coverage of this event reports ticket prices of £25 or £30.
- (p) **Premature event advertising** – While one web site advertises the event with the footnote ‘subject to licensing’ others appear to be advertising or selling tickets without the event even yet having licensing permission. This may amount to fraud by misrepresentation.
- (q) **Council publicity for this application** - I was unable to find any reference to this proposal using the Search box on the Council's web site. I suggest that the Licensing Dept follows the openness of Planning in publishing Licensing Applications online.
- (r) **Conditions** - In the event that draft conditions are considered, it would be helpful and commendable to be included in their circulation in the interests of transparency and so that those involved have some input in matters concerning their lives and a treasured parkland environment.
- (s) **Outcome** – Please kindly inform me of any public hearing and decision.

These considerations should be uppermost in the protection and management of the park.

I consider that in general, and in this particular case of an (up to) 7,000-person open air 3-stage music festival, this commercial exploitation should not take place of a natural, historical and environmental asset, for the quiet enjoyment of park users.

I also add the following non-licensing questions for the Council as land-owner and with Environmental responsibilities

- (j) **Carbon footprint** - A park is a naturally fairly ‘carbon neutral’ or ‘low carbon’ area – what will be the impact on the park’s and Council’s ‘carbon footprint’ by hosting major commercial events?
- (k) **London air quality** - What pollution will be created by generators and barbeques?
- (l) **Plastic use** - What will be the plastic and polystyrene use for drinks glasses, food stalls etc?
- (m) **Alcohol and public health** - How does the sale and consumption of alcohol in a public park align with the Council’s public health responsibilities and aspirations?

None of this happens if the park is treated as a park, not a revenue-raising place to be exploited.

4. Applicants' Documents and other appendices

4.1 Public notices

I list or include appendices for reference.

- (a) South London Press public notice – Public Notices – page 27 in the News Shopper, Public notices section on page 49 – a notice about 2.5 x 2.5 inches, among many others. Free, street hopper dispensed local paper. (not included in appendices)
- (b) 'Blue' licensing notice – A4 sheet seen on some park gates and lockable noticeboards
- (c) Beckenham Place Park licensed 5-zone plan - Map showing areas to be licensed – an A3 black on light blue map of 5 designated areas (A-E) in black outline. I append the original colour version used for the 14th May 2018 5-zone 5,000-person 365-day Alcohol and Entertainments Licence which the Council applied to itself for.

Of 5 locations where the text A4 notice was displayed (at gates, the Mansion etc) only at one location, by the south end of the new lake, was the plan also displayed. With the text notice alone, the location 'Zone E' of Beckenham Place Park must have been meaningless to 99.9% of readers.

4.2 Other appendices

For ease of reference, I also append the following

- BPP Local Nature Reserve – Plan of extent, web page listing, park notice image online
- Ancient Woodland Plan – natural England web site

5. Conclusion

For all the listed reasons, I object to the proposed Premises Licence for Beckenham Place Park.

I request that the Licensing Office recommends refusal, and that the Licensing Panel reject this inappropriate application.

For the matters outside licensing consideration, I request that as an addressee, you, the Mayor, Cabinet and Councillors withdraw permission for this and other commercially exploitative and damaging events in public parkland. I ask that you change parks policy to one more caring for the Council's parks, its informal users, landscape and wildlife.

I request that you think again and only make proposals which treasure, protect and enhance this beautiful park, its public enjoyment and its historic and nature conservation value which is unique in Lewisham Borough.

Nick 