

Report No.
ES20048

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: LICENSING SUB-COMMITTEE

Date: 23rd Nov 2020 1000hrs

Decision Type: Non-Urgent Non-Executive Non-Key

Title: APPLICATION FOR NEW PREMISES LICENCE FOR
FESTIVAL REPUBLIC IN CRYSTAL PALACE PARK THICKET
ROAD PENGE SE20 8DT

Contact Officer: Steve Phillips, Head of Health Safety and Licensing
Tel: 020 8313 4659 E-mail: steve.phillips@bromley.gov.uk

Chief Officer: Colin Brand Director of Environment and Public Protection

Ward: CRYSTAL PALACE

1. REASON FOR REPORT

- 1.1 To provide the Licensing Sub-Committee with information supporting them to determine whether to uphold or dismiss the objections placed against this application.
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2. RECOMMENDATIONS

- 2.1 The Licensing Sub-Committee are asked to determine this application having taken into account the Council's Statement of Licensing Policy 2016 to 2021, written and oral representations by the applicant and objectors.

Members can

1. Grant the licence
2. Grant the licence with the addition of conditions necessary to promote any of the licensing objectives
3. Exclude from the scope of the licence any of the licensable activities to which the application relates
4. Refuse to specify a person in the licence as the premise's supervisor
5. Reject the application

Impact on Vulnerable Adults and Children

1. Summary of Impact:

When making decisions under the Licensing Act 2003 the Council is required to promote the licensing objectives, one of which is the protection of children from harm.

Corporate Policy

1. Policy Status: Existing Policy:

The Council has adopted a statement of its licensing policy under the Licensing Act 2003 for the period 2016 to 2021.

2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Regeneration

Financial

1. Cost of proposal: Licensing statutes allow for an appeal to the Magistrates Court against the Council's decision. Should an appeal be made, costs are likely to be incurred but it is not possible to quantify these.
 2. Ongoing costs: Non-Recurring Cost
 3. Budget head/performance centre: Public Protection and Portfolio
 4. Total current budget for this head: £2.4 m
 5. Source of funding: Revenue Budget 2020/2021
-

Personnel

1. Number of staff (current and additional): 2 Licensing Officers supported by 4.5 FTE admin
 2. If from existing staff resources, number of staff hours: N/A
-

Legal

1. Legal Requirement: Statutory Requirement: The Council is the Licensing Authority for the Licensing Act 2003. This is a Non-Executive function and is delegated to the General Purposes and Licensing Committee. Where representations are received about a licence application, it is referred to the Licensing Sub Committee for a hearing and decision.
 2. Call-in: Not Applicable:
-

Procurement

1. Summary of Procurement Implications: Not applicable

Customer Impact

1. When considering and deciding on this application Members need to balance the benefits of holding the licence against any adverse effects to the Public, Local Residents and Businesses by considering its impact against the licensing objectives

Ward Councillor Views

1. Have Ward Councillors been asked for comments? Yes. Ward Members were notified about the application by e-mail on 8th Sept 2020
2. Summary of Ward Councilors' comments: No comments were received from Cllrs_

Responsible Authorities Views

The following Responsible Authorities were notified about this application and their views sought

Responsible Authority	Date Notified	Comments (further details in Appendix 2)
Metropolitan Police	08 th Sept 2020	No objections
Planning Authority	08 th Sept 2020	No Response
Trading Standards Service	08 th Sept 2020	No Response
Public Health Nuisance Team	08th Sept 2020	Objections made
Health & Safety Team	08 th Sept 2020	No objection made
Child Protection Team	08 th Sept 2020	No Response
Immigration (Home Office)	08 th Sept 2020	No Response
Fire Authority	08 th Sept 2020	No objection made
Public Health	08 th Sept 2020	No Response

Residents and Interested Parties

6 representations were received in support of this application and 42 were received objecting to the application. These representations are contained within **Appendix 2**.

3. COMMENTARY**3.1. Licensing Act 2003.**

The Licensing Act 2003 states that any premises require a licence/certificate issued by the Council (premises licence/club premises certificate) where the following activities occur: -

Provision of regulated entertainment

- a) Plays. (Where the audience exceeds 500 people)
- b) Films.
- c) Indoor sporting events. (Where the audience exceeds 1000 people)

- d) Boxing or wrestling entertainment.
- e) Live music. (subject to the Live Music Act 2013 exemptions)
- f) Recorded music.
- g) Performances of dance. (Where the audience exceeds 500

people) **Provision of late-night refreshment (between 2300hrs and 0500hrs)**. Supply of alcohol (on and off sales).

The supply of alcohol by or on behalf of a club to, or to the order of, a member of the club.

The sale by retail of alcohol by or on behalf of a club to a guest of a member of the club for consumption on the premises where the sale takes place.

Licences/Certificates may be issued subject to any terms, conditions or restrictions the Council feels are appropriate to address any or all of the four licensing objectives.

The Council has previously agreed Bromley's Statement of Licensing Policy for the Period 2016 – 2021.

The Licensing Sub-Committee must consider the Statement of Licensing Policy and any Special Policy of Cumulative Impact currently in force when making any decisions in respect of these applications.

Description of the Premises

The premises are a large Park that sits on the edge of LB Bromley at the Crystal Palace Border with several other London Boroughs. These events are planned to take place on the terraces area of the park which closely borders Southwark Councils area and residence.

Licensing History

The premises have been licenced under the Licensing Act 2003 for several short-term premises licences during 2019 and 2020 all of which have generated a small number of complaints in respect of amplified music noise. This application, event and production team have no history within Crystal Palace Park

Details of the Application

The full application form, plan and draft noise management plan is shown at appendix 1

This is an application for a three-year licence period for 2021, 2022, and 2023 to supply alcohol and provide regulated entertainment including live and recorded music and the provision of films on up to 6 days in each calendar year. For a maximum of 49,999 people on each day.

The above activities are to take place within the red line map/plan area which is centred around the main terraces within Crystal Place Park. The plan can be found at the end of the application contained within appendix 1.

The hours for regulated entertainment and alcohol are Monday to Sunday 1100hrs to 2230hrs

The premises opening hours are for a further 30mins till 2300hrs on each day.

The Six event days will occur between June and September each year.

Full details of the application are contained in **Appendix 1**.

Representations

During the public consultation period the Licensing Authority received 43 objections to the application including an objection from the Public Nuisance Team at the London Borough of Bromley and 6 representations of Support.

These representations are contained within **Appendix 2**.

4. IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 Licensing regimes provide for additional controls through specific permissions to undertake activities. Both the Licensing Act 2003 and Gambling Act 2005 contain licensing objectives which seek to protect vulnerable groups. In the case of the Licensing Act 2003 it seeks to protect children from harm whereas the licensing objectives under the Gambling Act 2005 are wider and seek to protect children and vulnerable adults from being harmed or exploited.
- 4.2 Businesses and the Council are required to promote these objectives in the way they operate or make decisions.
- 4.3 Details of applications under both Acts are referred to the appropriate safeguarding teams for comment. None were received in this instance.

5 POLICY IMPLICATIONS

- 5.1 Both the Licensing Act 2003 and the Gambling Act 2005 require the Council to prepare, consult on and publish statements of their licensing policy. These must be reviewed at least every 5 years under the Licensing Act and 3 years under the Gambling Act.
- 5.2 Members should make decisions in accordance with these policies but are free to depart from them with good reason.
- 5.3 The current policies are -

- Statement of Licensing Policy 2016 – 2021_

http://www.bromley.gov.uk/downloads/file/226/statement_of_licensing_policy_2016-2021

- Statement of Gambling Policy 2016-2019_

http://www.bromley.gov.uk/downloads/file/325/gambling_policy

6 FINANCIAL & LEGAL IMPLICATIONS

- 6.1 There are rights of appeal to the Magistrates Court against the decision of the Sub-Committee under both the Licensing and Gambling Acts. If an appeal were to be lodged

there are costs associated with defending it. These are difficult to quantify, and the Courts can award costs. In the event of a successful appeal we could pay the costs of the appellant as well as our own. Equally if we successfully defended an appeal, it is open to the Court to order our costs to be paid by the appellant.

- 62 Parties involved in a hearing before a Sub-Committee can also seek a Judicial Review if the Local Authority has failed to administer the hearing in accordance with proper procedures.
- 63 The Council has adopted a procedure for the conduct of hearings.

Non-Applicable Sections:	Personnel and Procurement implications
Background Documents: (Access via Contact Officer)	Soft File Computer based records

Appendix 1

Application Form, Plan and Draft Noise Management Plan



Bromley
Application for a premises licence
Licensing Act 2003

For help contact
licensing@bromley.gov.uk
 Telephone: 0208 313 4218

* required information

Section 1 of 21

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference This is the unique reference for this application generated by the system.

Your reference You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.

Are you an agent acting on behalf of the applicant? Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.

Yes No

Applicant Details

* First name

* Family name

* E-mail

Main telephone number Include country code.

Other telephone number

Indicate here if you would prefer not to be contacted by telephone

Are you:

Applying as a business or organisation, including as a sole trader

Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means you are applying so you can be employed, or for some other personal reason, such as following a hobby.

Applicant Business

Is your business registered in the UK with Companies House? Yes No

Registration number

Business name If your business is registered, use its registered name.

VAT number Put "none" if you are not registered for VAT.

Legal status

Note: completing the Applicant Business section is optional in this form.

*Continued from previous page...*Your position in the business Home country

The country where the headquarters of your business is located.

Registered Address

Address registered with Companies House.

Building number or name Street District City or town County or administrative area Postcode Country **Section 2 of 21****PREMISES DETAILS**

I/we, as named in section 1, apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in section 2 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003.

Premises Address

Are you able to provide a postal address, OS map reference or description of the premises?

 Address OS map reference Description
Postal Address Of PremisesBuilding number or name Street District City or town County or administrative area Postcode Country **Further Details**Telephone number Non-domestic rateable value of premises (£)

Section 3 of 21**APPLICATION DETAILS**

In what capacity are you applying for the premises licence?

- An individual or individuals
- A limited company / limited liability partnership
- A partnership (other than limited liability)
- An unincorporated association
- Other (for example a statutory corporation)
- A recognised club
- A charity
- The proprietor of an educational establishment
- A health service body
- A person who is registered under part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales
- A person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 in respect of the carrying on of a regulated activity (within the meaning of that Part) in an independent hospital in England
- The chief officer of police of a police force in England and Wales

Confirm The Following

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities
- I am making the application pursuant to a statutory function
- I am making the application pursuant to a function discharged by virtue of Her Majesty's prerogative

Section 4 of 21**NON INDIVIDUAL APPLICANTS**

Provide name and registered address of applicant in full. Where appropriate give any registered number. In the case of a partnership or other joint venture (other than a body corporate), give the name and address of each party concerned.

Non Individual Applicant's Name

Name

Details

Registered number (where applicable)

Description of applicant (for example partnership, company, unincorporated association etc)

Continued from previous page...

Address

Building number or name

Street

District

City or town

County or administrative area

Postcode

Country

Contact Details

E-mail

Telephone number

Other telephone number

* Date of birth / /
dd mm yyyy

* Nationality [Documents that demonstrate entitlement to work in the UK](#)

Section 5 of 21**OPERATING SCHEDULE**

When do you want the premises licence to start? / /
dd mm yyyy

If you wish the licence to be valid only for a limited period, when do you want it to end / /
dd mm yyyy

Provide a general description of the premises

For example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off- supplies you must include a description of where the place will be and its proximity to the premises.

Crystal Palace Park is an historic park in south east London with a distinguished history of staging music events. For these events, we propose to use the terraces, which are grassed and hard-standing areas which have historically lent themselves to larger events.

The Park's basic infrastructure includes internal tarmac paths, footway paths, some running water and mains electricity to

Continued from previous page...

certain areas.

The Park has vehicular access via a number of access routes and pedestrian access from several other gates around the boundary.

Event production parking can be facilitated in a number of places as the Park has ample car parking spaces. There will be no public parking for general ticket holders.

The emergency services have experience of previous events held in the Park.

The Park has a number of transport hubs in close proximity which will allow for a prompt customer egress after the events.

If 5,000 or more people are expected to attend the premises at any one time, state the number expected to attend

Section 6 of 21

PROVISION OF PLAYS

[See guidance on regulated entertainment](#)

Will you be providing plays?

- Yes No

Section 7 of 21

PROVISION OF FILMS

[See guidance on regulated entertainment](#)

Will you be providing films?

- Yes No

Standard Days And Timings

MONDAY

Start

End

Start

End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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WEDNESDAY

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THURSDAY

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FRIDAY

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SATURDAY

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SUNDAY

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Will the exhibition of films take place indoors or outdoors or both?

- Indoors
 Outdoors
 Both

Where taking place in a building or other structure tick as appropriate. Indoors may include a tent.

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Films may be shown including short films on the Main Stage screens between music acts from 11:00 to 22:30 each event day.

State any seasonal variations for the exhibition of film

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Non standard timings. Where the premises will be used for the exhibition of film at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 8 of 21

PROVISION OF INDOOR SPORTING EVENTS

[See guidance on regulated entertainment](#)

Will you be providing indoor sporting events?

- Yes
 No

Section 9 of 21

PROVISION OF BOXING OR WRESTLING ENTERTAINMENTS

Continued from previous page...

[See guidance on regulated entertainment](#)

Will you be providing boxing or wrestling entertainments?

- Yes No

Section 10 of 21

PROVISION OF LIVE MUSIC

[See guidance on regulated entertainment](#)

Will you be providing live music?

- Yes No

Standard Days And Timings

MONDAY

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End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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SUNDAY

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Will the performance of live music take place indoors or outdoors or both?

- Indoors Outdoors Both

Where taking place in a building or other structure tick as appropriate. Indoors may include a tent.

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Continued from previous page...

Amplified music may be played between 11:00 - 22:30 each event day including live performances by DJs.

State any seasonal variations for the performance of live music

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Non-standard timings. Where the premises will be used for the performance of live music at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 11 of 21

PROVISION OF RECORDED MUSIC

[See guidance on regulated entertainment](#)

Will you be providing recorded music?

- Yes No

Standard Days And Timings

MONDAY

Start

End

Start

End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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FRIDAY

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Will the playing of recorded music take place indoors or outdoors or both? Where taking place in a building or other structure tick as appropriate. Indoors may include a tent.

Indoors
 Outdoors
 Both

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Recorded music may be played as a performance and in between acts on all stages.

State any seasonal variations for playing recorded music

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Non-standard timings. Where the premises will be used for the playing of recorded music at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 12 of 21

PROVISION OF PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will you be providing performances of dance?

Yes
 No

Standard Days And Timings

Continued from previous page...

MONDAY

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Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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SUNDAY

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Will the performance of dance take place indoors or outdoors or both?

- Indoors Outdoors Both

Where taking place in a building or other structure tick as appropriate. Indoors may include a tent.

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Dance may or may not be performed as part of the events where amplified music is played.

State any seasonal variations for the performance of dance

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Continued from previous page...

Non-standard timings. Where the premises will be used for the performance of dance at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 13 of 21

PROVISION OF ANYTHING OF A SIMILAR DESCRIPTION TO LIVE MUSIC, RECORDED MUSIC OR PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will you be providing anything similar to live music, recorded music or performances of dance?

- Yes No

Standard Days And Timings

MONDAY

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End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

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SUNDAY

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Give a description of the type of entertainment that will be provided

Will this entertainment take place indoors or outdoors or both?

- Indoors
 Outdoors
 Both

Where taking place in a building or other structure tick as appropriate. Indoors may include a tent.

State type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.

Events may include cabaret or comedy performances.

State any seasonal variations for entertainment

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Non-standard timings. Where the premises will be used for entertainment at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 14 of 21

LATE NIGHT REFRESHMENT

Will you be providing late night refreshment?

- Yes
 No

Section 15 of 21

SUPPLY OF ALCOHOL

Will you be selling or supplying alcohol?

- Yes
 No

Standard Days And Timings

Continued from previous page...

MONDAY

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End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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Will the sale of alcohol be for consumption:

- On the premises Off the premises Both

If the sale of alcohol is for consumption on the premises select on, if the sale of alcohol is for consumption away from the premises select off. If the sale of alcohol is for consumption on the premises and away from the premises select both.

State any seasonal variations

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Events may take place between June and September only. A challenge 21 policy will be implemented.

Non-standard timings. Where the premises will be used for the supply of alcohol at different times from those listed in the column on the left, list below

Continued from previous page...

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

State the name and details of the individual whom you wish to specify on the licence as premises supervisor

Name

First name

Family name

Date of birth / /
dd mm yyyy

Enter the contact's address

Building number or name

Street

District

City or town

County or administrative area

Postcode

Country

Personal Licence number (if known)

Issuing licensing authority (if known)

PROPOSED DESIGNATED PREMISES SUPERVISOR CONSENT

How will the consent form of the proposed designated premises supervisor be supplied to the authority?

- Electronically, by the proposed designated premises supervisor
- As an attachment to this application

Reference number for consent form (if known)

If the consent form is already submitted, ask the proposed designated premises supervisor for its 'system reference' or 'your reference'.

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ADULT ENTERTAINMENT

Continued from previous page...

Highlight any adult entertainment or services, activities, or other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children

Give information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups etc gambling machines etc.

NONE

Section 17 of 21

HOURS PREMISES ARE OPEN TO THE PUBLIC

Standard Days And Timings

MONDAY

Start

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Start

End

Give timings in 24 hour clock. (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

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State any seasonal variations

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Continued from previous page...

Events may take place between June and September only. Event dates will be agreed at least 6 months prior to the first event each year.

Non standard timings. Where you intend to use the premises to be open to the members and guests at different times from those listed in the column on the left, list below

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Section 18 of 21

LICENSING OBJECTIVES

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

List here steps you will take to promote all four licensing objectives together.

The Applicant is the most experienced organiser of major outdoor music events in the UK and has extensive experience of successfully organising major events in Parks, Public Spaces, Stadia and Venues throughout London. It has a highly experienced management team and engages tried and tested contractors to provide services to events, such as, security, noise management, traffic and transport management, medical provision, welfare provision, waste management etc.

Event Planning

It is proposed that the Premises Licence will authorise up to 6 event days each calendar year in 2021, 2022 and 2023 between 1 June and 15 September.

Each year, notice of the proposed event days for that year will be provided by the Premises Licence Holder (PLH) to the Licensing Authority and the Police at least 6 months prior to the first event day. The event days will be agreed with the Licensing Authority.

The PLH shall liaise with the Multi Agency Forum (also referred to as the Safety Advisory Group) established to advise upon the events authorised by the Premises Licence each year.

Each year a draft Event Management Plan (EMP) will be submitted by the PLH to the Multi Agency Forum for comment and discussion at least 3 months prior to the first event day. The draft EMP shall contain, but not be limited to:-

1. Site Plan
2. Covid-19 Statement
3. Appendices 1-21
 - Appendix 1 - Adverse Weather Plan
 - Appendix 2 - Alcohol Management Plan
 - Appendix 3 - Crowd Management Plan
 - Appendix 4 - Child Protection and Safeguarding Policy
 - Appendix 5 - Counter Terrorism Plan
 - Appendix 6 - Health and Safety Policy
 - Appendix 7 - Fire Risk Assessment
 - Appendix 8 - Major Incident Plan
 - Appendix 9 - Medical Management Plan

Continued from previous page...

- Appendix 10 - Operational Management Plan
- Appendix 11 - Noise Management Plan
- Appendix 12 - Risk Assessment
- Appendix 13 - Sanitation and Waste Management Plan
- Appendix 14 - Security Placement Schedule
- Appendix 15 - Site Map
- Appendix 16 - Traffic and Transport Management Plan
- Appendix 17 - Water Safety Plan
- Appendix 18 - Production Schedule / CDM Build Schedule
- Appendix 19 - Tent Exit Calculations
- Appendix 20 - Fire Extinguisher Allocation
- Appendix 21 - Ingress / Egress Plan

Each year the final draft of the EMP shall be submitted by the PLH to the Multi Agency Forum for approval 28 days before the first event day.

Thereafter any further changes to the EMP must be approved by the Licensing Authority.

Throughout an event the PLH shall establish an Event Control to include the Event Liaison Team (ELT) comprising representatives of the PLH, Security and Multi Agency Forum.

During event days the ELT shall manage operation of the event. Any necessary changes to the EMP may only be made with the consent of the ELT.

The PLH will implement the EMP.

The EMP will include a Management Structure setting out key responsibilities based on the Gold/Silver/Bronze structure which is well understood by the organisers, Multi Agency Forum/Responsible Authorities.

A copy of a template of the draft EMP accompanies this application.

A Multi Agency debrief shall be held within 3 months of the last event day each year.

MULTI AGENCY FORUM

We will utilise the format of Multi Agency meetings to bring together all key event staff and agencies involved in the event and we propose meeting once a month to ensure everyone is up to date with all plans and has a platform to raise any concerns. It will be at these meetings that the detail of the event's progress and direction will be discussed. Multi Agency meetings will continue throughout the actual event itself twice daily at times to be agreed with the Multi Agency Forum.

Any authorised officer of the London Metropolitan Police, the Chief Fire Officer, any authorised officer of the London Fire Brigade, any authorised officer of London Borough of Bromley (LBB), and any authorised officer of the Child Protection Agency shall have access to the licensed site at all reasonable times for the purposes of enforcing the observance of the licence conditions, for the prevention and detection of crime and criminal activity, the prevention of public nuisance, public safety and the protection of children from harm.

b) The prevention of crime and disorder

THE METROPOLITAN POLICE

We will liaise with London Metropolitan Police on procedures, crime prevention advice and other guidance in all relevant matters.

Regular meetings will take place with the Metropolitan Police Service to ensure liaison and co-operation at all stages of the planning, during the event itself and post event to debrief. Crime reporting and handover procedures will be agreed with the Metropolitan Police Service no later than 28 days prior to the start of the events.

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Should police services be required at the event we will provide the Metropolitan Police Service with an area in Event Control as well as some space for essential police vehicles.

The Metropolitan Police Service will be notified at the earliest opportunity in the case of any incidents of serious crime and disorder where the victim consents and where the victim does not consent, where an intervention is required to maintain wider public safety at the discretion of the Security Co-ordinator or PLH.

SECURITY PLAN

This plan will form part of the EMP. The aims and objectives of the security plan in relation to crime and disorder are:-

- To prevent and deter incidents of crime.
- To provide a covert patrol to detect illegal activity.
- To deal positively and proportionately with any incidents of disorder / anti-social behaviour.
- To provide an eviction service from site.
- To ensure the security of onsite infrastructure, bars, stages etc.

The key objectives of our security strategy will be: -

- Strong liaison with the Metropolitan Police to facilitate intelligence sharing and mutual support.
- The interaction of security staff at an early stage with ticket holders in a positive and friendly manner.
- The use of mobile response units to react quickly to reports of incidents.
- The use of covert intelligence gathering staff and behaviour detection officers to pinpoint groups of troublemakers / dealers etc.
- The eviction of persons attempting to cause problems or stirring up large groups of people to behave in an anti-social manner.
- The use of a co-ordinated approach with strong management from the Security Co-ordinator.

The PLH will require that all security, stewarding, trader companies, bar companies, cleaners and other large staffing groups vet their staff to an appropriate level. This will be audited by PLH. The PLH will also discuss the option of PNC checks with the Metropolitan Police Service.

A register of the security and stewards employed on the site will be password protected and held securely by the Licensing Office.

All incidents will be recorded in an approved incident log. The incident log will be open to inspection by agencies at all times in the Licensing Office.

All security and stewarding personnel will be readily identifiable to others by means of a tabard bearing a job title and a conspicuous unique personal identification number. This identification number will be displayed prominently on the front and rear and will be in a large font. The details of the uniform(s) to be worn by the security and stewarding personnel will be provided to The Metropolitan Police as part of the EMP.

The profile and the training documentation for each security company will be available on request. Security staff will be briefed on the policies concerning the admission, exclusion and safeguarding of ticket holders whilst in the premises. In addition, a comprehensive staff handbook will be provided and we expect them to keep it on their person whilst on shift.

Security in sufficient numbers will be deployed.. The security and stewarding placement schedule will be submitted to the Multi Agency Forum 28 days prior to the commencement of the event. This schedule will include details of the numbers of personnel. A draft version of this schedule will be submitted at least 3 months in advance of the event.

A daily audit of security numbers will be undertaken by the Security Coordinator.

Crime Prevention Advice and Patrols

Crime prevention advice will be agreed with the Metropolitan Police Service in advance and relevant information displayed on signage around the site and on the event websites. Festival Republic will employ covert security who will monitor the site.

Lost Property

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Lost Property will be handled by the Information / Lost Property / Welfare tent. There will be an email address for the public to contact should they have lost any items. One company will keep hold of all lost property and continue to reunite items with their owners after the event.

DRUGS POLICY

The drugs policy will be agreed in advance of the event with the Metropolitan Police Service and submitted with the EMP.

CCTV

CCTV will be installed at agreed locations across the site to give coverage of strategic points and key locations on site. These locations will be marked on the site plan. The CCTV at the arena entrance will enable monitoring of crowd flows. A bank of CCTV monitors will be situated in the Event Control Tent to allow for management, security contractors and CCTV controllers to monitor situations and incidents and deploy staff appropriately and it will be taped continuously, recorded in real time and stored post event.

All agencies will be welcome inside Event Control to view the CCTV images at any time.

The CCTV company will have a contractual obligation to provide a log and regular update to the Security Co-ordinator and PLH detailing any problems with any cameras or equipment or any other issues that have occurred.

Any requests to view the footage will come via the London Metropolitan Police Silver Commander during the event and via a nominated officer post event.

GENERAL SEARCHING POLICY

The priority of the searching operation shall be to deter, disrupt and detect those attempting to enter the event with banned or illegal items, while simultaneously maintaining good order and public safety as well as an efficient flow rate of customers through the gate.

Searching will be carried out in accordance with the Security Policy and this will be communicated via signage at all entrances and in the ticket terms and conditions. Searching is permitted onsite with consent under our terms and conditions of entry but is not permitted offsite. Offsite is defined as on the public highway and/or on land that is outside our control. The searching regime will have flexibility built into it.

A senior member of staff will monitor searching so that issues can be escalated and searching regimes finessed as required during events.

An assessment will be made by the PLH in conjunction with the Security Co-ordinator(s) and the Metropolitan Police about what level of searching should be employed for each specific event.

Searching and Seizures Briefings for Security Staff will be detailed in the EMP.

A Surrender System will be detailed within the EMP.

There will be an eviction policy in place. This will be detailed within the EMP.

UNDERAGE DRINKING

A Challenge 21 policy will be in place on site. Bar staff will ask for proof of age ID whenever the customer appears to be under 21. The proof of age will need to be evidenced by an agreed form of ID. If there is any doubt as to the age of the customer they will be refused service. We are aware that the system may be subject to attempted abuse by over 18s buying alcohol for those under 18. Warning signs will be used to also advise of the illegality of this practice. The Designated Premises Supervisor will be required to brief bar security staff that they should take reasonable steps to monitor the final destination of alcoholic drinks.

No bar servers will be under 18. All reasonable efforts will be made to stop and discourage underage drinking by placing spotters in the bar areas and by the Designated Premises Supervisor briefing all bar security as well as the bar staff to monitor for instances of underage drinking. In addition, the Designated Premises Supervisor, security, the bar manager and other bar supervisors will also monitor the performance of the serving staff. Test purchasing operations by Trading

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Standards will be welcome at any time and full co-operation will be given as required.

Soft drinks and free drinking water will be available onsite as an alternative to alcohol.

COUNTER TERRORISM

Counter Terrorism is taken very seriously and a number of measures will be implemented. These measures will be scaled according to the threat levels at the time of the events.

A Counter Terrorism Statement will be contained with the EMP.

c) Public safety

CAPACITY

The maximum capacity is 49,999 to include ticket holders, guests, artists, staff and contractors.

CROWD MANAGEMENT

The events will be designed in such a way as to keep the ticket holders entertained for the duration of the regulated entertainment with multiple and varied performances and many other features as well as on site facilities. The nominated competent person with overall responsibility for crowd management safety is the PLH. The PLH will task the Security Co-ordinator to review any reports from staff working and co-ordinate any actions where appropriate to facilitate public safety across the whole site.

The arena entrance will be planned to open earlier than the regulated entertainment starts in order to stagger the ticket holder's entry.

All infrastructure will be designed and erected with public safety in mind. Tent poles and lighting towers in key public areas will be fenced off or protected in another way or highlighted where protection is not possible and trip hazards in public areas will be minimized and highlighted where unavoidable.

Aims of the crowd management operation

The public safety objectives of the crowd management operation are: -

- To maintain a safe environment for members of the public / staff / artists working at the events.
- To ensure only authorised ticket and pass holders gain access to the relevant areas.
- To monitor crowd movements, identify and deal promptly and effectively with any identified crowd control issues.
- To take necessary action to prevent and deter unauthorised fires.

SECURITY AND STEWARDING

Security and stewarding companies

We will contract a number of security companies and stewarding companies. The companies contracted will be notified to the local authority and emergency services in the EMP.

The areas and numbers of deployments will be detailed in the Security Placement Schedule which will form part of the EMP. It should be noted that the placements and numbers need some ability to be fluid to be able to react appropriately to unexpected crowd behaviour.

Co-ordination of security and stewarding companies

The companies above will be co-ordinated by a Security Co-ordinator based in Event Control. It is our intention that Event Control will contain the following contractors / staff

- Security Co-ordinator / Deputy / Communications operator
- Security contractor control desks
- Fire control
- Medical control
- CCTV and operators
- Premises Licence Holder (or Deputy) – emergency situations
- Representatives from LBB

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• Noise Management contractor

This will facilitate close and continued liaison between all the key personnel and contractors leading to a rapid co-ordination of response and redeployments, flexibility, management and supervision being maintained throughout the events.

Crowd sway/surges

Our Security placements, CCTV and pit spotters together with the stage barrier set up mean that we will make all reasonable endeavours to ensure that the crowd are carefully monitored and managed in all instances including any crowd sways or surges. The spotters will be a senior member of the security team or, at busy times the PLH or Deputy. The spotter's responsibility will be to monitor the movement of the crowd, particularly watching for any sways, surges or unusual crowd behaviour. Crowd Surfing will be actively discouraged by the use of signage, advance information via the event website and the implementation of a crowd surfing policy, details of which will be notified to the Multi Agency Forum via the EMP.

Crowd movements/egress

Our security placements, CCTV and egress spotters together with the site layout mean that we will make all reasonable endeavours to ensure that crowd movements / egress are carefully monitored and managed. There will be CCTV installed at the arena entrance and exit to enable monitoring of crowd flows.

EVACUATION AND EMERGENCY ACCESS

A Table Top exercise will be offered each year to rehearse emergency scenarios within the Multi Agency Forum. Large scale maps with grid lines showing emergency routes will be provided to those in Event Control before the start of the event.

A Major Incident Plan will be included within the EMP and will include a key personnel contact sheet and an evacuation plan. This will be submitted to the Multi Agency Forum and discussed as part of the pre planning process.

Temporary roadways will be laid where necessary to aid access and the routes will have strategic passing places.

ORIENTATION AND INFORMATION

All access and egress routes, sanitary accommodation, drinking water, first aid points and public transport will be adequately and conspicuously signposted. Signs will be clear, visible and adequately illuminated at night and safety signs will conform to legislative requirements. All emergency exit gates will be provided with relevant gate numbers identifiable from both inside and outside the arena and these will correspond with the site plan.

Customer friendly site maps will be published on the official website and large scale maps will be provided at strategic locations around the site.

Welfare tent

A Welfare Tent will be located in an agreed position on site. It will be open throughout the duration of the events to help people who find themselves requiring assistance.

Information point

An Information Point will be situated in an agreed position on site and staffed by Festival personnel to provide information to persons attending the event. The information tent will have details on the location of facilities, local services, transport and entertainment.

The event website will host travel information, conditions of entry and details of onsite facilities. This information will also go out to all ticket buyers in our pre event communications.

MEDICAL FACILITIES

Medical provision

The PLH will appoint a suitably competent organisation to provide medical and first aid cover on site. The confirmed medical contractor will be notified to the Multi Agency Forum in the EMP. This contractor will be a reputable medical contractor that has been fully vetted by Festival Republic. There will be a fully staffed medical centre on site at all times

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when the site is open to the public.

Medical Management Plan

A full medical management plan will be provided by the medical contractor and PLH as part of the EMP. This will be fully risk assessed against the relevant legislation and will include a breakdown of staffing numbers as well as the operational plan for the event site.

Build-up and breakdown

Outside of the hours of onsite cover any incidents on site will be dealt with by the assigned First Aider, or transferred to hospital if necessary. There will be a designated first aider on site at all times during the build and break periods.

The First Aid points will be carefully positioned to maximise cover for all areas of the site. The medical points will be shown on the site plan.

Documentation

A log will be kept of all actions and decisions made by the onsite medical provision. This will be held confidentially by the provider.

The Licensee shall make provision for the recording of and notification to the Licensing Authority of any suspected instance of notifiable infectious disease or including any suspected cases of food poisoning presenting to the medical and first aid provider on the Licensed Premises.

FIRE SAFETY

Fire Safety Advisors

We will appoint experienced fire safety advisors to act as our competent person(s) to conduct the Fire Risk Assessment. The Fire Risk Assessment is dynamic and will be reviewed as necessary during the events. The Fire Risk Assessment will be submitted to the Multi Agency Forum as part of the EMP.

Fire Safety Team

We will appoint a Fire Safety Team to assist with the management of fire safety. The contracted Fire Safety company will be notified to the Multi Agency Forum as part of the EMP. The roles and responsibility of Fire Safety Team will be as set out in the Major Incident Plan and the Fire Risk Assessment.

Fire Equipment And Fire Points

Appropriate fire fighting equipment and exit signs will be provided. All fire points will be clearly signed and visible.

The Fire Safety Team will be provided with radios and a desk within Event Control.

A patrol will be instituted as soon as any temporary structure is erected to watch for possible fire hazards. As a matter of course all stewards and security will be instructed to watch for possible fire hazards.

Flammability Certification

Fire safety details of all special effects to be used will be submitted to London Fire Brigade prior to the start of the events. Fire safety details of all backdrops to be used will either be submitted to London Fire Brigade prior to the start of the events or can be checked by London Fire Brigade onsite.

All floor coverings, wall coverings, curtains, drapes, fabric, artificial or dried foliage, decorations and filling materials used in furnishings supplied and used will carry flame retardancy certification to the relevant British Standards or will be inherently flame retardant. The details of all such materials will be held by the Health and Safety Team and will be available for inspection by London Fire Brigade onsite.

Fire Breaks

The siting of all vehicles, generators, tents, marquees, dressing rooms etc. shall be arranged so as to provide fire breaks. To minimise the risk of a fire spreading from any temporary dressing room accommodation, all such rooms shall be sited at least 6m (20ft) away from the stage and from the area occupied by ticket holders. The Fire Safety Team will check that fire breaks are adequate and maintained on an ongoing basis.

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Fire Safety For Traders

All traders are sent fire safety information relevant to their onsite activity and are checked when onsite by our fire safety team and gas inspectors.

Fire Exits - Means Of Escape

Fire Exits will be provided in all structures to give access to the arena from where, if necessary, ticket holders can be marshalled to an evacuation holding point. Tent exit calculations and drawings for any new structures and tents that will be used for public assembly will be submitted to Building Control and London Fire Brigade no later than 28 days prior to the events and will be erected accordingly. Means of escape from structures will be by signed and lit exits. It is very unlikely that any staircases will be used in public areas but if they are they will conform to legislative requirements. The place of safety will be the evacuation holding point which will be designated as required.

It is very unlikely that any indoor buildings will be used but if they are, then they will conform to legislative requirements. At Crystal Palace Events we will be erecting a perimeter fence to enclose the arena. We will have enough emergency exit gates for the capacity of the arena according to legislative guidance. During the event all emergency exit gates will be unlocked and staffed by security and stewards. All exit signs will conform with legislative requirements and all exit doors / gates will be clearly signed and lit where appropriate. Fire exits will be checked by the Fire Safety Team on an ongoing basis. Emergency lighting will be checked by the electrical contractor.

Further information will be submitted with the EMP in the form of the Fire Risk Assessment and Tent Exit Calculations.

PYROTECHNICS AND SPECIAL EFFECTS

We anticipate that some pyrotechnics and special effects may be included as part of some of the acts' performances. Details will be collected in advance and reviewed by the Health and Safety team. It will be a condition of contract with the operator that they are only used in compliance with the relevant legislation. This will be expanded on in the Fire Risk Assessment. All details of proposed pyrotechnics will be sent to London Fire Brigade and the Licensing Authority for approval in advance of the events.

The Event Safety Coordinator will be in direct liaison with London Fire Brigade and the pyrotechnic contractor and will carry out an additional check once any pyrotechnics are installed to check compliance with agreed positions and the effects list.

TRADER LPG SAFETY

To limit the amount of LPG brought onto site by traders, we will give accreditation to an authorised LPG supplier to supply all traders as required. We will create a secure storage area for this LPG during the event in a non-public area. All trader's LPG is checked by the onsite Fire Safety Team on an ongoing basis and they will prohibit the use of any unsafe equipment that they find. Pre and post event we will create a secure compound for any LPG containers found on site. We will then arrange for them to be collected from site by the appropriate organisations. All secure storage areas for LPG will be clearly marked as "no smoking areas".

STRUCTURES

The PLH, Site Manager and Event Safety Co-ordinator will take all reasonable steps to ensure that all temporary structures are suitable and fit for their intended purpose and installed in accordance with the contractor's plans. Copies of the completion certificates for all temporary structures will be available to the Licensing Authority on request, appropriately endorsed by the contractor or other competent person, prior to the commencement of their use.

The PLH will obtain documents, plans and calculations relating to the stages and other relevant temporary structures. Copies of these can be submitted to LBB on request. All exits will be kept clear from obstruction by equipment and cables etc. at all times by security personnel.

Handrails will be provided for any stairways. Measures will be taken to ensure that ramps are slip resistant. All temporary structures will be erected by competent contractors in accordance with submitted calculations, plans and specifications where relevant as well as in accordance with their risk assessments and safety method statements.

The PLH will commission an independent Structural Engineer to examine all temporary structures on the site and all drawings thereof.

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On site a variety of barriers will be used in strategic places. The front of stage barrier including a secondary barrier will be supplied by a reputable company known to Festival Republic. The barrier contractor will be notified to the Multi Agency Forum in advance of the event. Technical details will be shared with the Multi Agency Forum. It is our intention that crowd channelling barriers will be used in areas such as the Arena Entrance to separate the crowd into lanes. The Arena Entrance barrier lanes will be reconfigured in time for egress. This will be visible on the site plan.

A written wind speed policy will be in place throughout the event and it will incorporate information from and for all relevant contractors. This will be written into the Adverse Weather Plan. It will include an outline of actions to be taken at specific wind speed trigger points. The Event Safety Co-ordinator will check that periodic wind speed measurements are taken throughout the site occupation period.

As the park itself is a Grade II listed Heritage Site an advance survey will be undertaken to ensure any areas used are structurally sound. Both the Sphinx and the terraces will be protected as necessary. The steps will be reviewed and bridged where necessary.

LIGHTING

All access/exit ways leading to and from the licensed site, stairways if used, routes through to the main highways, toilet blocks and first aid points will be illuminated by the provision of suitable lighting systems. Sufficient portable lighting equipment will be available to address any areas of inadequate lighting on the approaches to the licensed site.

ELECTRICS

A temporary electrical system will be set up on site using temporary generators and wiring systems. All work will be carried out by competent and experienced electrical contractors. Emergency lighting will be provided on all arena and tent exits and other key areas. Lighting will be provided in any marquees.

It is a condition of contract between caterers and us that their electrical power will be supplied and managed by our electrical contractor.

Generators

Consideration will be given to the safe location and protection of generators.

VEHICLE AND PLANT SAFETY

The PLH will give instruction to all staff and contractor drivers that vehicular movement while ticket holders are on the licensed site must be limited to essential journeys and controlled in the interests of the safety of ticket holders. Any drivers found driving carelessly or dangerously will be disciplined. Only fully certificated workers will use the appropriate site plant supplied. Their certification will be checked by the Production Office before keys are distributed. Traders will be briefed to the effect that vehicle movement within the licensed arena during the curfew hours is strictly prohibited. All onsite personnel will be briefed that any vehicle movement within the remainder of the licensed site must be undertaken with extreme caution. An onsite traffic management plan will be available via the Multi Agency forum.

GROUND CONDITIONS

If required ground conditions can be improved with the use of woodchip or other similar materials. Trip hazards will be minimised and tent pegs / scaffolding will be covered with pipe lagging. The arena manager will monitor the ground conditions in the arena and take any action required to minimise trip hazards. Due to the nature of the ground conditions, it will rarely be necessary to clear up any spillages (unless they are chemicals etc) but each situation will be risk assessed as it arises.

An inspection of the grassed areas of the site will take place on day 1 of the build.

SANITARY FACILITIES AND DRINKING WATER

A Water Safety Plan will be provided to the satisfaction of LBB Environmental Service and included in the EMP.

Drinking Water

- Location, numbers and types of drinking water points
- Sources of water supply
- Methods of sterilisation of taps and erected systems prior to use

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- Methods and frequency of ongoing cleaning, sanitising and monitoring of water points throughout the event
- Drainage of water point areas
- Water quality sampling regime before and during the event
- Methods proposed to evidence that the above steps have been taken
- Nominated personnel to be responsible for monitoring throughout the event

Sufficient drinking water points will be placed around the licensed site for the adequate supply of free drinking water for ticket holders throughout the event. The water systems will be installed by competent contractors. Installations will be cleaned, sterilised and free from debris prior to connection to any mains or tanked water supply.

Water samples will be taken by recognised, aseptic water sampling methods and submitted for testing to an Approved Water Testing Laboratory. Sampling will be carried out prior to the event and at appropriate intervals leading up to and during the event. Details of sample points and sample results will be logged and submitted to LBB Health and Safety team.

The water point areas will be monitored on a regular basis throughout the event. Monitoring will include checks on adequacy of drinking water supply, checks on cleaning and sanitisation of the points, checks for leaks, damage, flooding and blockages. Any problems identified will be addressed straight away.

A Sanitation and Waste Management Plan will be provided to the satisfaction of LBB Environmental Health Service and included in the EMP.

The sanitation section of the strategy will include

- Location, numbers and types of sanitary accommodation, washing facilities provided
- Methods and frequency of emptying, cleaning and monitoring of the sanitation facilities throughout the event
- Methods and frequency of refilling and monitoring hand sanitizer units
- Drainage of sanitation areas
- Nominated personnel to be responsible for monitoring throughout the event

Sufficient sanitary accommodation units and hand sanitation units will be placed in suitable locations around the licensed site for the provision of sanitary facilities for ticket holders throughout the event. Numbers will be shared in advance with the Multi-Agency forum as part of the EMP.

The sanitary accommodation units and hand sanitisation units will be monitored on a regular basis throughout the event; the frequency of maintenance and monitoring will take account of peaks and troughs in demand for the facilities throughout the event. Monitoring will include checks on cleaning and sanitisation of the units, checks for leaks, damage, flooding and blockages. Any problems identified will be addressed straight away.

Sanitary accommodation units will be regularly emptied throughout the event by a competent licensed contractor. Emptying procedures will conform to site safety rules as outlined in any Risk Assessments and site health and safety policies.

The PLH will have a team of monitors who will check that all sanitary facilities on site are serviced and maintained to a high standard.

TRADERS

POSITION OF TRADER

As far as is possible, traders will be positioned well away from the stage and exits from the licensed site and will remain stationary in the arena until the site is clear of the public and Event Control gives permission for movement. The position of catering units, bars and non-food traders will be marked on the site plan.

All food traders will be coordinated where possible by one concession management company. All details and documentation for food traders will be collated by this company and provided to LBB Food Safety team for inspection. Festival Republic will provide LBB all assistance in the inspection of food premises.

ALCOHOL

A comprehensive Alcohol Management Plan will be submitted as part of the EMP. The distribution and number of bar

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outlets will be designed to provide a reasonable geographical distribution close enough to the stocking area to maintain access and security. The final site map will clearly show the confirmed positions of these outlets each year.

All bar staff involved in the sale of alcohol will be trained in the strengths of drinks and will be able to give customers advice on this. They will be instructed to monitor customers for instances of drunkenness and not to serve those who are drunk. Adherence with this will form part of our contractual agreements with the Designated Premises Supervisor, bar concessionaires, security, stewards and any other relevant contractors, staff or sponsors. All relevant staff and contractors will be clearly briefed by the Designated Premises Supervisor on these issues. Briefing documents and contracts will be available for inspection in the Licensing Office. All alcohol products will be clearly merchandised as alcoholic products and therefore not easily confused with non-alcoholic products. There will be a price list displayed at each bar which will give the "alcohol by volume" levels of each drink. No alcohol will be served in glass or glass containers in public areas.

There will be clear signage up to state that alcohol can not be brought onto site.

We recognise the issue of binge drinking which must be addressed effectively although we have no history of a problem with this. Ticket holders will not be permitted to bring their own alcohol with them onto site. When alcohol is available for sale on site ticket holders are more likely to drink in a relaxed and responsible manner thereby helping with issues of public order. Selling alcohol in this manner also provides a degree of control by the trained staff over those ticket holders consuming the alcohol which would not otherwise be so readily available. The large number of staff and the bar concessionaire's experience and training will enable the crowd to be serviced in a quick and efficient manner so that they do not have to queue for long periods of time which will therefore decrease the likelihood of "over ordering" in an attempt to avoid having to queue further.

An extensive programme of training will be organised by the bar concessionaire. These training documents will be available to LBB on request.

Each bar will be run by a bar supervisor and this person under the direction of the Designated Premises Supervisor will be fully in charge of the bar tent. If the bar supervisor perceives that there may be a public order issue with a refusal to serve a particular individual they will isolate the situation wherever possible and deal with the matter away from the crowd beside the working compound to the rear or side of the tent. Security guards will be employed who will be based continuously in the bar area. They will help the bar staff and other event security monitor potential drunkenness. There will not be any irresponsible drinks promotions such as happy hours or two for one offers.

The event website will host information around the dangers of alcohol (and drugs) and provide guidance on where ticket holders can get help should they require it. The medical and welfare tents will be equipped to deal with any potential drunkenness if required.

FACILITIES FOR DISABLED TICKET HOLDERS

The PLH will arrange for special provisions for disabled access customers, namely access and egress routes, car parking (where available), sanitation facilities and viewing areas where appropriate. There will be a pre registration scheme available so we can determine the number of access customers planning on attending the event. This will allow us to ensure we have the appropriate facilities available to accommodate all guests. There will be disabled access viewing platforms at the main stages. Ticket holders, who need to be accompanied by a PA, will be entitled to a free of charge PA ticket. Information will be sent out in advance to all disabled access ticket holders which will provide information about all the facilities available on site, as well as details of transport hubs nearby. The safe evacuation of disabled access ticket holders will be overseen by the onsite disabled access team. There will be trained members of staff to implement the emergency egress plans with regards to disabled access customers.

INTERNAL CHECKLISTS AND INSPECTIONS

Regular and ongoing inspections will be carried out by the Event Safety Co-ordinator, Fire Safety team, or other key personnel. Routine maintenance checks will be carried out by the appropriate contractors. Visual safety checks will be conducted by staff prior to using any equipment or plant. Regular checks of plant will be conducted by the Site Manager or Event Safety Co-ordinator. Checks of emergency access lanes will be carried out on a regular basis. The PLH or his Deputy or the Site Manager and the Event Safety Co-ordinator will carry out an inspection of the arena prior to opening each morning and ongoing inspections of the site. All inspections that are carried out by Festival Republic will be documented on checklists and will be available for inspection by agencies in the Licensing Office.

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HEALTH AND SAFETY

We are fully committed to safe working practices and a copy of our Health and Safety documentation will be available on request. The Health and Safety Policy contains full details of our working practices and procedures and will be submitted with the EMP.

All phases of the event including the load in, the event itself and the load out will be given equal status as far as health and safety is concerned. All contractors are required to fill in our Health and Safety documentation and be approved by the Health and Safety team before their contract is considered binding. All contractors will be given a copy of the Site Rules and in the case of contractors who we have not worked with in the past, they will be vetted.

Work onsite will be monitored by the PLH, Site Manager and Event Safety Co-ordinator and safety inspections will take place regularly. All users will be briefed via the Site Rules to conduct visual checks prior to using equipment. We will conduct an internal safety audit and review of the events and an external audit and review in conjunction with the Multi Agency Forum at the post event debrief each year if required.

Areas which are subject to noise impact for long periods of time will be designated as Ear Protection Zones and staff will be required to wear hearing protection within these zones.

The build and break phases of Crystal Palace Events come under Construction (Design and Management) Regulations 2015 (CDM 2015). The events are a notifiable project under CDM through the HSE's F10 system.

RESPONSIBILITY FOR PUBLIC SAFETY / HEALTH AND SAFETY

The security of the licensed site and the safety of persons within it under the Licensing Act 2003 will be the responsibility of the PLH during the period of licensable activities on the site each year.

The Occupant Capacity for the Site is well in excess of the 49,999 people able to attend (including artists, guests, staff and contractors). Plans and drawings for new structures and tents will be collected and shared with the relevant members of the Multi Agency Forum.

Fire Safety Campaign

We will include fire safety messages on our website detailing the onsite fire precautions and the action to be taken in case of a fire.

Gas Canisters And Aerosols

Gas canisters and aerosols will not be permitted onsite. Security will confiscate any gas canisters or aerosols found at the gates. They will be transferred to the onsite LPG store in a non-public area.

Fire Safety During The Load In and Load Out

A fire watch will be started as soon as any structures are built and will remain until all structures are decommissioned. Fire extinguishers will be based in all areas used for sleeping accommodation (if applicable) and catering. Any LPG that is used or stored onsite during the load in and load out will be stored or used correctly and safely. Any pyrotechnics that are delivered during the load in will be stored safely and correctly.

COVID 19

All Events are subject to Government guidance and all relevant legislation relating to Covid 19 which will be followed accordingly. Relevant guidance when published will be incorporated into the EMP which will be subject to scrutiny by the Multi Agency Forum.

d) The prevention of public nuisance

NOISE MANAGEMENT

A comprehensive Noise Management Plan will be undertaken by an experienced acoustic consultant which will form part of the EMP. This Noise Management Plan will contain the maximum noise levels permitted and the acoustic consultants management strategy and measures to control music noise levels during the events.

Continued from previous page...

The Noise Consultant will assess the positioning of sound sources pre event and liaise with LBBs noise consultants throughout the event. Sound checks will take place the day prior to the event as well as the morning of the event. Times for these checks are to be agreed in advance with LBBs noise team. The Noise Consultant will be available throughout the duration of the event and will have complete authority to ensure compliance with the Noise Management Plan. They will hold regular meetings with LBB Noise team during the event. A means of radio communication will be provided to the Noise Team to enable ease of communication.

The sound amplification systems will not be used after the permitted hours of musical entertainment on any night of the event for the relaying of music or for any purpose except for emergency announcements relating to public order and safety.

A resident's hotline will be installed on site and will be publicised in advance of the event to local residents by way of a leaflet and will be staffed throughout the events. All calls will be logged and the log will be held by the Licensing Office. All calls to the hotline relating to noise, will be reported to Noise team who will have teams both on and off site to monitor noise. This number will be operational in line with arena opening times.

Plant and machinery, food preparation, cleaning, waste collection and other activities that might generate noise are all undertaken well inside the site and at a considerable distance from any residential properties.

TRANSPORT, TRAFFIC AND DISPERSAL

A Traffic and Transport Management Plan (TMP) will be drawn up for the Events each year by Festival Republic in consultation with the Multi Agency Forum. The TMP will be reviewed annually.

This plan will include arrangements for vehicle routes, public transport, taxis, a dispersal policy, and a traffic signage plan. The PLH will consult with LBB Network Management team, London Metropolitan Police, TfL, London Overground, Govia Thameslink Rail, London Buses and Festival Republics appointed Traffic Management Company. This plan will be reviewed annually. It will cover all aspects of production vehicle access to and egress from the event during the load in and load out as well as for the event itself.

As there is no public parking on site vehicle movements should be minimal.

TfL will be consulted in relation to Black Cab pick up and drop off points. Uber and other private hire firms will also be liaised to ensure a central pick up location. They will be contacted in advance of the event and a suggested routing will be communicated to them. A Taxi Rank will be set up if applicable at an agreed location with the Multi Agency Forum. Festival Republic will liaise with Uber in the planning phase.

In addition to the TMP an Ingress / Egress Plan focusing on pedestrian movements will be developed with guidance from with the Multi Agency forum, Transport for London, London Overground, Network Rail, London Buses, Uber and other taxis companies to ensure a smooth pedestrian egress at the end of the events.

All advised transport routes will be communicated in advance with ticket holders. We will stress that there is no parking on site and encourage people to arrive by public transport. Travel information will be kept up to date on the event websites. There will be advance warning signage in key areas to let locals know of peak periods should they wish to avoid the area. Signs will be installed on all of the key routes in advance of the events to alert local drivers of the increased use of the key routes, subject to agreement by the relevant agencies.

A signage contractor, will be appointed to implement all off-site traffic management signage if necessary. Due to the location of the event we anticipate road signage to be minimal. Our signage contractor will liaise with the relevant agencies on our behalf well in advance of the event.

If deemed relevant, advance warning signage will be in place 14 days prior to the first event. We will maintain a capability to create, erect or move traffic signs, until the Tuesday following the events and the specified signage and contractor will be on standby throughout this period to change or remove the traffic management works as and when directed by LBB within a reasonable response time.

The majority of pedestrians will arrive by public transport due to the location of the site.

Continued from previous page...

Vehicles parked off-site in non-approved areas may be towed away by London Metropolitan Police with the full support of Festival Republic.

There are 6 Stations in close proximity to the site as well as a bus terminal. The PLH will work with the transport providers to develop a comprehensive Egress Plan which will be submitted as part of the EMP.

Crystal Palace Station can be accessed from within the park itself which will reduce the need for ticket holders to queue for transport externally.

The multiple car parks / hard standing areas within the park can be explored for bus and taxi use which again keeps the dispersal phase as contained as possible.

Taxis are likely to run until the demand for them has finished and if applicable, taxi ranks will be kept open until the site has been cleared.

As dispersal is scheduled to finish by 23:00, egress will be contained to this time period.

Clear and legible notices will be displayed at exits, and other circulatory areas requesting patrons to leave the premises having regard to the needs of local residents, in particular emphasising the need to refrain from sounding horns and loud use of vehicle stereos.

Security and stewards will be positioned along the egress routes where reasonable to safeguard both residents and ticket holders.

Security and stewards will monitor the activity of persons leaving the premises and remind them of their public responsibilities where necessary.

No alcohol is served in open bottles or open glasses. Due to the site design it is very unlikely that any ticket holders would walk from a bar to a gate with a drink and therefore the potential for disorder and disturbance as ticket holders leave the premises will be minimised. Notices will be prominently displayed at all exit points to inform ticket holders that open drinks cannot be taken off the premises. In the unlikely event that ticket holders do attempt to leave the site with open drinks, security will be on the exit routes to confiscate the items.

Signage will be displayed on the exit routes asking ticket holders to please respect the local area when leaving. The main stage screens can also be utilised for this type of messaging.

LITTER

The collection and disposal of refuse from all parts of the site and a litter and waste management strategy will be provided to the satisfaction of LBB Environmental Protection Team and incorporated in the EMP. The said strategy will identify:

- Location and number of containers
- Emptying and replacement schedule
- Steps to remove litter throughout the event
- Standby procedures to address any identified refuse accumulations e.g. overflowing receptacles
- After event cleaning schedule
- Steps to prevent litter from being dropped offsite
- Steps to remove litter along entrances and exits adjacent to the site
- Arrangements for waste produced by traders
- Methods proposed to evidence that the above steps have been taken.

Once agreed the contents of the strategy will be followed throughout the event.

LIGHT POLLUTION

As the event is situated in Crystal Palace it is very unlikely that the lighting from the event will cause significant light pollution in excess of that already in the surrounding area. As far as is reasonably practicable we will ensure that all lighting provided to the site is directed into the site.

Continued from previous page...

All reasonable efforts will be made to ensure that these do not cause any light pollution that intrudes upon the comfort and amenity of nearby residents to such an extent as to be a nuisance. They will be located in consultation with the appropriate residents and they will face away from their properties.

TRADING STANDARDS

Full co-operation will be given at all times with Trading Standards for any investigations or inspections that they want to carry out. We actively encourage investigations against counterfeiting, illegal touting and test purchasing etc, at all times and will be pleased to work with Trading Standards on these issues.

LIAISON WITH LOCAL RESIDENTS AND LOCAL BUSINESSES

All reasonable efforts will be made to ensure that effective communication will be undertaken with local residents. A meeting will be held for members of the local area which will be attended by members of the PLH. LBB will also be invited to attend. This meeting will be for information purposes and to answer any queries relating to the proposed concerts. Details of this meeting will be circulated to the local community in advance of the meeting.

Information for residents and businesses will be hosted on the event website. This will include any traffic restrictions, key timings and how to get in contacts with us.

Residents Hotline

The residents hotline number will be available as a facility for local residents to call in with any concerns, observations or complaints. Local residents will be encouraged to get in touch at any time and all of their concerns will be comprehensively considered. The hotline will be operational during the hours of the event and will be answered by Festival Republic Event Staff. Where necessary calls taken can easily be referred to the Security Coordinator, the Noise Team, or the Police.

e) The protection of children from harm

SAFEGUARDING OF CHILDREN AND VULNERABLE ADULTS

The sale of alcohol is not the primary activity onsite but is a secondary activity to the main activity of regulated entertainment. All reasonable efforts will be made to ensure staff are competently trained in Challenge 21.

No table meals will be served at the events, therefore there will not be any situations where a 16 or 17 year old is allowed to drink beer, wine or cider with a table meal provided that an adult purchase the drink.

The Welfare Tent will be open in line with the arena opening hours and will remain open as long as there is someone in their care. The welfare tent can offer assistance to young adults including a drugs advisory service. If necessary, psychiatric care will be available in the on site medical provision as well as from staff in the Welfare Tent.

Drugs, alcohol and health advice and counselling are available at the Welfare Tent and liaison between facilities will ensure that facility users will receive appropriate care. All welfare staff will be over 18 years of age and are aware of emergency procedures and communication with other agencies. As necessary welfare staff will liaise with parents or guardians, Social Services and other appropriate agencies.

The PLH has compiled a Safeguarding policy to provide information regarding the protection and mental wellbeing of individuals, and to outline how we will safeguard vulnerable children/vulnerable persons from abuse, harm, and neglect.

LOST CHILDREN POLICY (Incorporated within the overall Safeguarding Policy)

The PLH have a comprehensive Safeguarding Policy which will be included as part of the EMP.

FACILITIES FOR CHILDREN

As these events will not be events that attract many children, there will not be any planned and separate children's areas. However all facilities onsite such as toilets, sanitizers, drinking water, food and drink, lighting, medical provision, information tent etc are suitable for children as well as adults. Our welfare teams will be trained accordingly and DBS checked where necessary.

Continued from previous page...

NOTES ON DEMONSTRATING ENTITLEMENT TO WORK IN THE UK

Entitlement to work/immigration status for individual applicants and applications from partnerships which are not limited liability partnerships:

A licence may not be held by an individual or an individual in a partnership who is resident in the UK who:

- does not have the right to live and work in the UK; or
- is subject to a condition preventing him or her from doing work relating to the carrying on of a licensable activity.

Any premises licence issued in respect of an application made on or after 6 April 2017 will become invalid if the holder ceases to be entitled to work in the UK.

Applicants must demonstrate that they have an entitlement to work in the UK and are not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity. They do this in one of two ways: 1) by providing with this application copies or scanned copies of the documents listed below (which do not need to be certified), or 2) by providing their 'share code' to enable the licensing authority to carry out a check using the Home Office online right to work checking service (see below).

Documents which demonstrate entitlement to work in the UK

- An expired or current passport showing the holder, or a person named in the passport as the child of the holder, is a British citizen or a citizen of the UK and Colonies having the right of abode in the UK [please see note below about which sections of the passport to copy].
- An expired or current passport or national identity card showing the holder, or a person named in the passport as the child of the holder, is a national of a European Economic Area country or Switzerland.
- A Registration Certificate or document certifying permanent residence issued by the Home Office to a national of a European Economic Area country or Switzerland.
- A Permanent Residence Card issued by the Home Office to the family member of a national of a European Economic Area country or Switzerland.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder indicating that the person named is allowed to stay indefinitely in the UK, or has no time limit on their stay in the UK.
- A **current** passport endorsed to show that the holder is exempt from immigration control, is allowed to stay indefinitely in the UK, has the right of abode in the UK, or has no time limit on their stay in the UK.
- A **current** Immigration Status Document issued by the Home Office to the holder with an endorsement indicating that the named person is allowed to stay indefinitely in the UK or has no time limit on their stay in the UK, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A birth or adoption certificate issued in the UK, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A birth or adoption certificate issued in the Channel Islands, the Isle of Man or Ireland **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A certificate of registration or naturalisation as a British citizen, **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.

Continued from previous page...

- A **current** passport endorsed to show that the holder is allowed to stay in the UK and is currently allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity.
- A **current** Biometric Immigration Document (Biometric Residence Permit) issued by the Home Office to the holder which indicates that the named person can currently stay in the UK and is allowed to work relation to the carrying on of a licensable activity.
- A **current** Residence Card issued by the Home Office to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights or residence.
- A **current** Immigration Status Document containing a photograph issued by the Home Office to the holder with an endorsement indicating that the named person may stay in the UK, and is allowed to work and is not subject to a condition preventing the holder from doing work relating to the carrying on of a licensable activity **when produced in combination with** an official document giving the person's permanent National Insurance number and their name issued by a Government agency or a previous employer.
- A Certificate of Application, **less than 6 months old**, issued by the Home Office under regulation 18(3) or 20(2) of the Immigration (European Economic Area) Regulations 2016, to a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence.
- Reasonable evidence that the person has an outstanding application to vary their permission to be in the UK with the Home Office such as the Home Office acknowledgement letter or proof of postage evidence, or reasonable evidence that the person has an appeal or administrative review pending on an immigration decision, such as an appeal or administrative review reference number.
- Reasonable evidence that a person who is not a national of a European Economic Area state or Switzerland but who is a family member of such a national or who has derivative rights of residence in exercising treaty rights in the UK including:-
 - evidence of the applicant's own identity – such as a passport,
 - evidence of their relationship with the European Economic Area family member – e.g. a marriage certificate, civil partnership certificate or birth certificate, and
 - evidence that the European Economic Area national has a right of permanent residence in the UK or is one of the following if they have been in the UK for more than 3 months:
 - (i) working e.g. employment contract, wage slips, letter from the employer,
 - (ii) self-employed e.g. contracts, invoices, or audited accounts with a bank,
 - (iii) studying e.g. letter from the school, college or university and evidence of sufficient funds; or
 - (iv) self-sufficient e.g. bank statements.

Family members of European Economic Area nationals who are studying or financially independent must also provide evidence that the European Economic Area national and any family members hold comprehensive sickness insurance in the UK. This can include a private medical insurance policy, an EHIC card or an S1, S2 or S3 form.

Original documents must not be sent to licensing authorities. If the document copied is a passport, a copy of the following pages should be provided:-

- (i) any page containing the holder's personal details including nationality;
- (ii) any page containing the holder's photograph;
- (iii) any page containing the holder's signature;
- (iv) any page containing the date of expiry; and
- (v) any page containing information indicating the holder has permission to enter or remain in the UK and is permitted to work.

Continued from previous page...

If the document is not a passport, a copy of the whole document should be provided.

Your right to work will be checked as part of your licensing application and this could involve us checking your immigration status with the Home Office. We may otherwise share information with the Home Office. Your licence application will not be determined until you have complied with this guidance.

Home Office online right to work checking service

As an alternative to providing a copy of the documents listed above, applicants may demonstrate their right to work by allowing the licensing authority to carry out a check with the Home Office online right to work checking service.

To demonstrate their right to work via the Home Office online right to work checking service, applicants should include in this application their 9-digit share code (provided to them upon accessing the service at <https://www.gov.uk/prove-right-to-work>) which, along with the applicant's date of birth (provided within this application), will allow the licensing authority to carry out the check.

In order to establish the applicant's right to work, the check will need to indicate that the applicant is allowed to work in the United Kingdom and is not subject to a condition preventing them from doing work relating to the carrying on of a licensable activity.

An online check will not be possible in all circumstances because not all applicants will have an immigration status that can be checked online. The Home Office online right to work checking service sets out what information and/or documentation applicants will need in order to access the service. Applicants who are unable to obtain a share code from the service should submit copy documents as set out above.

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NOTES ON REGULATED ENTERTAINMENT

Continued from previous page...

In terms of specific **regulated entertainments** please note that:

- Plays: no licence is required for performances between 08:00 and 23.00 on any day, provided that the audience does not exceed 500.
- Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
- Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
- Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
- Live music: no licence permission is required for:
 - o a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
 - o a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
- Recorded Music: no licence permission is required for:
 - o any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
 - o any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
 - o any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.

Continued from previous page...

- Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
 - o any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
 - o any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
 - o any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
 - o any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.

Section 21 of 21

PAYMENT DETAILS

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

Premises Licence Fees are determined by the non domestic rateable value of the premises.

To find out a premises non domestic rateable value go to the Valuation Office Agency site at http://www.voa.gov.uk/business_rates/index.htm

Band A - No RV to £4300 £100.00

Band B - £4301 to £33000 £190.00

Band C - £33001 to £87000 £315.00

Band D - £87001 to £12500 £450.00*

Band E - £125001 and over £635.00*

*If the premises rateable value is in Bands D or E and the premises is primarily used for the consumption of alcohol on the premises then your are required to pay a higher fee

Band D - £87001 to £12500 £900.00

Band E - £125001 and over £1,905.00

There is an exemption from the payment of fees in relation to the provision of regulated entertainment at church halls, chapel halls or premises of a similar nature, village halls, parish or community halls, or other premises of a similar nature. The costs associated with these licences will be met by central Government. If, however, the licence also authorises the use of the premises for the supply of alcohol or the provision of late night refreshment, a fee will be required.

Schools and sixth form colleges are exempt from the fees associated with the authorisation of regulated entertainment where the entertainment is provided by and at the school or college and for the purposes of the school or college.

If you operate a large event you are subject to ADDITIONAL fees based upon the number in attendance at any one time

Capacity 5000-9999 £1,000.00

Capacity 10000 -14999 £2,000.00

Capacity 15000-19999 £4,000.00

Capacity 20000-29999 £8,000.00

Capacity 30000-39000 £16,000.00

Capacity 40000-49999 £24,000.00

Capacity 50000-59999 £32,000.00

Capacity 60000-69999 £40,000.00

Capacity 70000-79999 £48,000.00

Capacity 80000-89999 £56,000.00

Capacity 90000 and over £64,000.00

* Fee amount (£)

24,100.00

DECLARATION

Continued from previous page...

- * I/we understand it is an offence, liable on conviction to a fine up to level 5 on the standard scale, under section 158 of the licensing act 2003, to make a false statement in or in connection with this application.

Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

* Full name

* Capacity

* Date / /
dd mm yyyy

Once you're finished you need to do the following:

1. Save this form to your computer by clicking file/save as...
2. Go back to <https://www.gov.uk/apply-for-a-licence/premises-licence/bromley/apply-1> to upload this file and continue with your application.

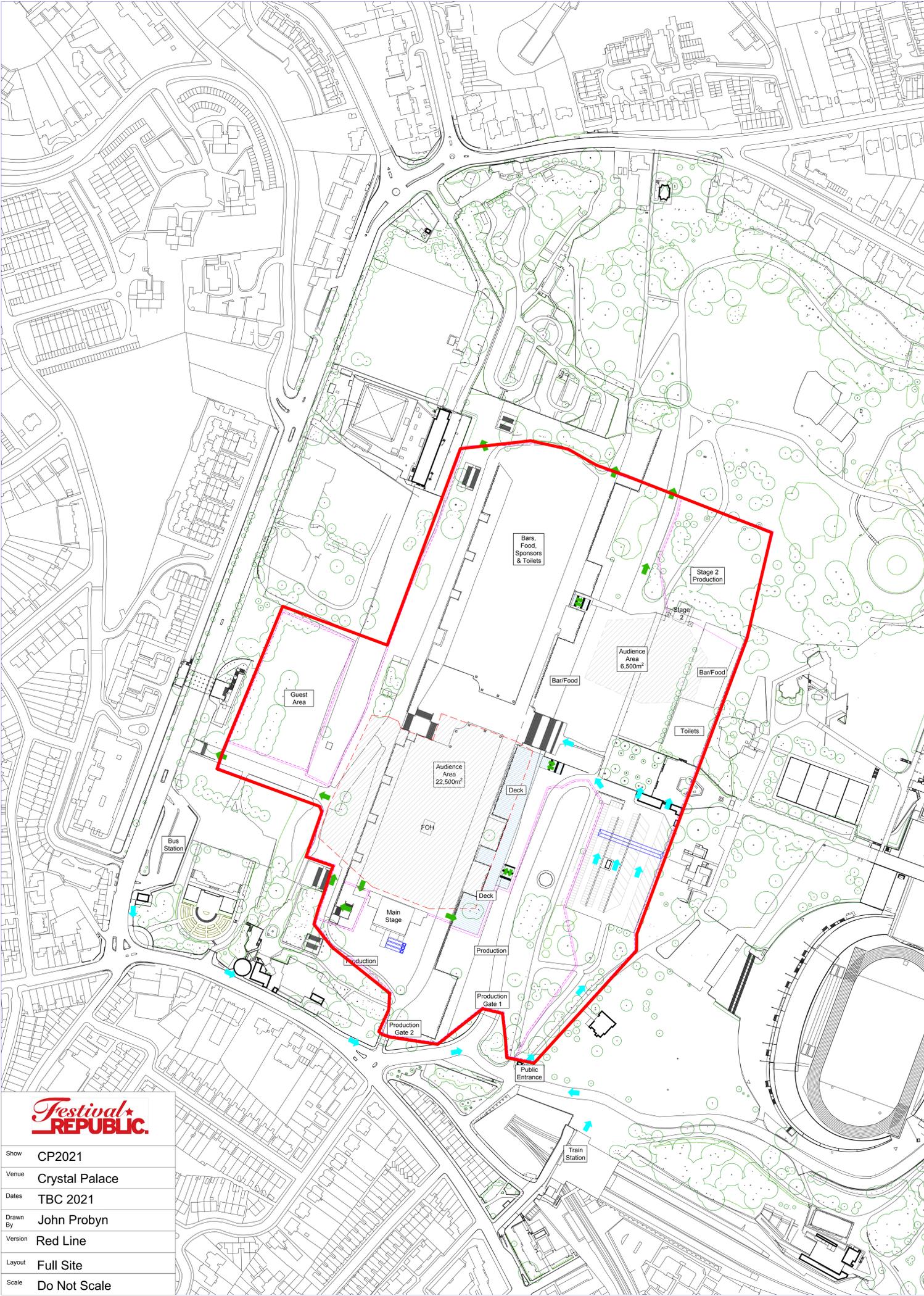
Don't forget to make sure you have all your supporting documentation to hand.

IT IS AN OFFENCE LIABLE TO SUMMARY CONVICTION TO A FINE OF ANY AMOUNT UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED

OFFICE USE ONLY

Applicant reference number	<input type="text" value="FESTIVAL REPUBLIC"/>
Fee paid	<input type="text"/>
Payment provider reference	<input type="text"/>
ELMS Payment Reference	<input type="text"/>
Payment status	<input type="text"/>
Payment authorisation code	<input type="text"/>
Payment authorisation date	<input type="text"/>
Date and time submitted	<input type="text"/>
Approval deadline	<input type="text"/>
Error message	<input type="text"/>
Is Digitally signed	<input type="checkbox"/>



Show	CP2021
Venue	Crystal Palace
Dates	TBC 2021
Drawn By	John Probyn
Version	Red Line
Layout	Full Site
Scale	Do Not Scale

Crystal Palace Park Events 2021

Crystal Palace Park

Thicket Rd

London

SE19 2GA

Draft Event Noise Management Plan

For: Live Nation Music UK Ltd



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CRYSTAL PALACE PARK EVENTS 2021

DRAFT EVENT NOISE MANAGEMENT PLAN

IDENTIFICATION TABLE	
Client/Project Owner	Live Nation Music UK Ltd
Project	Crystal Palace Park Events 2021
Study	Draft Event Noise Management Plan
Type of Document	Report
Date	25/09/2020
Reference Number	TS/NMP/2020/24
Number of Pages	26

DOCUMENT CONTROL				
Version	Name	Position	Date	Modifications
Rev1	Chris Hurst	Principal Consultant	08/09/2020	
Rev2			11/09/2020	Minor amendments
Rev3			16/09/2020	Minor amendments
Rev4			23/09/2020	Updates and amendments
Rev5			24/09/2020	Updates and amendments
Rev 6			25/09/2020	Updates and amendments

DISCLAIMER

This report was completed by Three Spires Acoustics Ltd on the basis of a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the terms of the Contract with the Client and taking into account the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project.

Three Spires Acoustics Ltd accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works. This report is issued in confidence to the Client and by Three Spires Acoustics Ltd has no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk. Unless specifically assigned or transferred within the terms of the agreement, by Three Spires Acoustics Ltd retains all copyright and other intellectual property rights, on and over the report and its contents.

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1. INTRODUCTION

Three Spires Acoustics Ltd (TSA) have been commissioned by Live Nation Music UK Ltd to provide a Venue Viability Assessment and Draft Event Noise Management Plan for proposed music events to be held at Crystal Palace Park, Thicket Rd, London SE19 2GA on 9th to 11th July and 16th to 18th July 2021. This is a preliminary discussion document and will be shared with the council's environmental health officer, once one is appointed to review the proposals. The aim is to assess the viability of the event space and provide outline noise management procedures that will be implemented in order to minimise the effects of noise from live and recorded amplified music and assist with compliance of the Licensing Act 2003 objectives. This outline plan will be amended and enhanced once further event specific details are known and once discussions with the local authority have been undertaken.

1.1 Consultant's Experience

Three Spires Acoustics is an acoustic consultancy specialising in providing advice to the entertainment industry and licensing authorities on matters relating to the management of sound and regulatory compliance at outdoor and indoor events.

The team of consultants has experience dealing with many outdoor concerts and events throughout the UK including; Parklife, Field Day, Bluedot, Lost Village Festival, and SW4 at Clapham Common amongst many others. Consultants have membership of the Institute of Acoustics (IOA) and the Chartered Institute of Environmental Health (CIEH) and the Institute of Licensing (IOL) and several members of staff have a regulatory or sound engineering background.

Chris Hurst will be the principal consultant working on this project and has over 20 years experience working on behalf of local authorities and private clients dealing with concert noise control throughout the UK. Chris also part of the Institute of Acoustics (IOA) working party looking into Good Practice Guidance for Noise Control from Places of Entertainment and also on the working party which has been formed by the Chartered Institute of Environmental Health (CIEH) to review and update the Code of Practice on Environmental Noise Control at Concerts 1995.

As well as the provision of sound and acoustic design/management for entertainment venues, the company deals with a range of noise and regulatory control issues and our staff have presented expert testimony at planning and licensing hearings.

1.1.1 Professional Associations

Members of The Institute of Acoustics (MIOA)

Members of The Institute of Licensing (AMIOL)

Members of the Chartered Institute of Environmental Health (MCIEH)

Chartered Environmental Health Practitioner (CEnvH)

2. SITE AND EVENT DESCRIPTION

- 2.1.1 Crystal Palace Park is a Victorian Park and pleasure ground, used for cultural and sporting events. It is located in the south-east London suburb of Crystal Palace, in the London Borough of Bromley and is also bounded by the London Boroughs of Lewisham, Southwark, Lambeth and Croydon.
- 2.1.2 Large scale open-air summer concerts have been held since the 1960s within the park and have ranged from classical and orchestral music, to rock, pop, blues and reggae. The proposed festival site occupies an area of open park land within Crystal Palace Park, with residential dwellings located on adjoining roads around the park and the London Overground railway line to the east of the park.
- 2.1.3 The proposal is to host six music event days from the 9th to 11th July and 16th to 18th July 2021 and will include a main stage and one other outdoor stage, as well as concession stalls and bars. Live and recorded music forms part of the regulated entertainment, which will be subject to premises licence conditions related to noise control. An aerial photograph of the site is presented in Figure 1 below. A plan layout is presented in Appendix A.

Figure 1. Crystal Palace Park Google Aerial Photograph



2.2 Draft Outline Operational Schedule

- 2.2.1 Table 1 below details the outline operational schedule for the 2021 events, this is preliminary in nature and further specific details will be added once known and after discussions with the local authority have taken place.

Table 1. Draft Outline Operational Schedule

Day	Sound Check & Prop Testing	Gates Open	Egress Start	Curfew
Thursday	To be agreed with LA in advance	Na	Na	TBC
Friday	10.00	TBC	21.30	22:30
Saturday	10.00	11.00	21.30	22:30
Sunday	10.00	11.00	21.30	22:30

2.3 Acoustic Environment

- 2.3.1 The area around the site is that of an urban outer city location with major road and rail networks close to existing commercial and residential properties. The acoustic environment will be dominated by transportation noise from road and rail vehicles using these arterial routes as well as commercial premises related noise.
- 2.3.2 DEFRA has published strategic noise map data that provide a snapshot of the estimated noise from major road and rail sources across England in 2017. The data was developed as part of implementing the Environmental Noise Directive. The noise contour map for the area around the site is presented in Figures 2 & 3 below and includes the modelled LAeq,16hour noise contours for the major road and rail noise.
- 2.3.3 The maps indicate that the closest residential areas around the park, with the exception of the south east corner, are likely to experience noise exposure from daytime road traffic noise between 55dB to 65dB LAeq,16hour. Rail noise only affects the area to the south and south east of the park with levels between 55dB to 65dB LAeq,16hour.
- 2.3.4 Regarding aircraft noise we understand that the area is below the 54dB LAeq,16hour noise contour profile, however there are periodic overflights over the park which will contribute to the acoustic climate.

Figure 2. Road Traffic Noise Contour Map LAeq,16hour

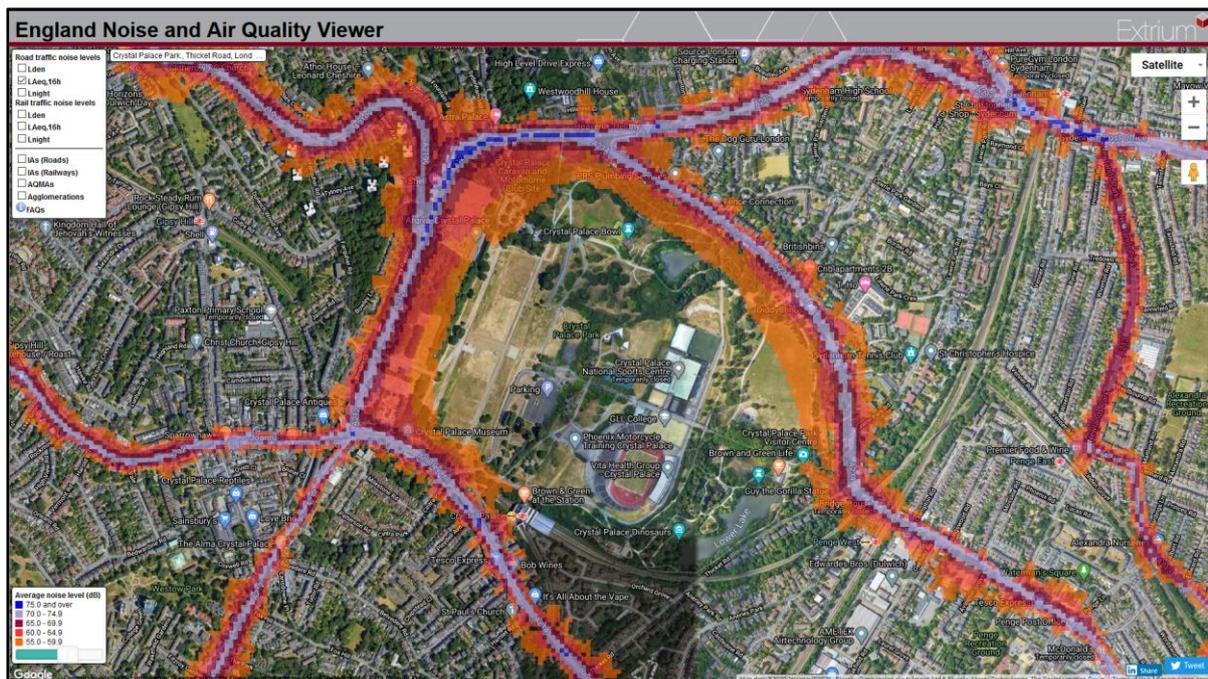
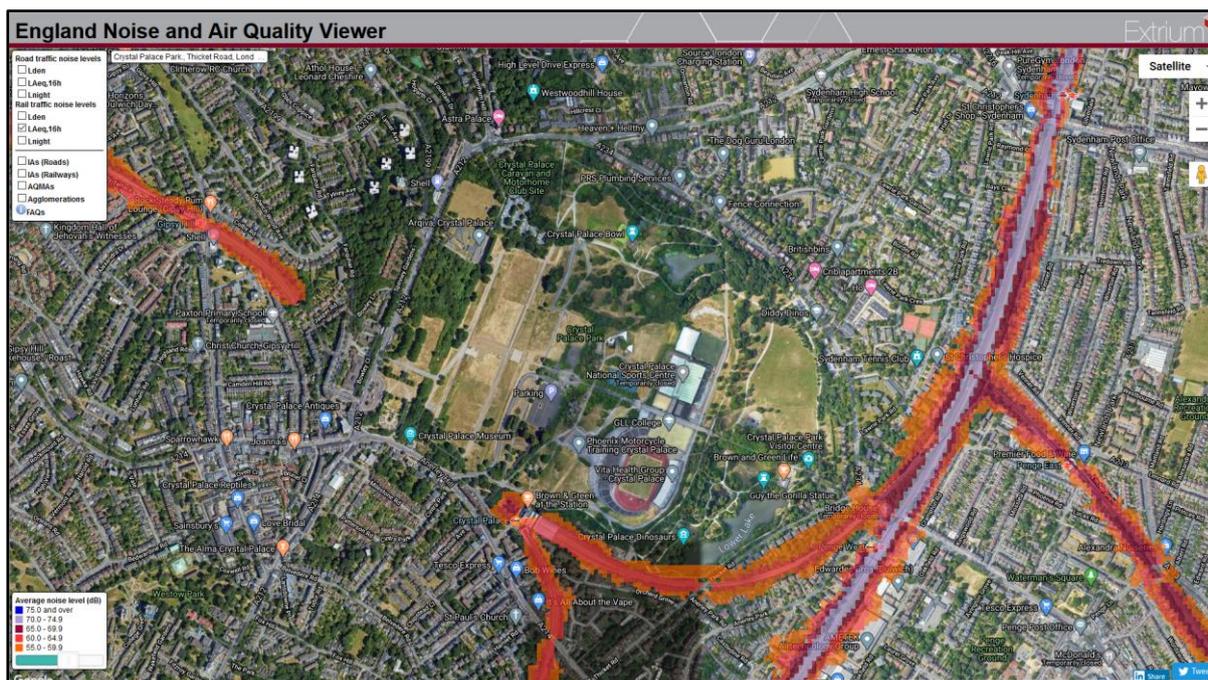


Figure 3. Rail Traffic Noise Contour Map LAeq,16hour



3. LOCAL AUTHORITY REQUIREMENTS

3.1.1 At this stage we understand that LB Bromley have not appointed an officer to review the draft NMP, however in due course and once an officer is appointed the Environmental Health Department at the council will be contacted to discuss proposals and requirements in more detail.

3.2 LB Bromley Statement of Licensing Policy 2016-2021

3.2.1 The introduction to the policy statements states;

3.2.2 *The Licensing Authority has a wide range of responsibilities including helping to develop and promote a strong sustainable local economy. Thriving food, drink and entertainment businesses in the Borough are an important part of that local economy and this policy is critical to their continuing success and for attracting further investment and opportunity to the Borough. Balanced against this is the Council's legal duties and commitment with its partners to reducing crime and disorder and the fear of crime. It is also important to protect and maintain our environment so that residents, visitors and other businesses can enjoy the opportunities for living, visiting and working within the Borough safely and free from nuisance.*

3.2.3 We understand that the Park is not in a Cumulative Impact Zone.

3.3 Crystal Palace Park Trust Events Policy

3.3.1 The London Borough of Bromley has developed a regeneration plan for the Park with restoration of the Park assets and redevelopment of the top site as a garden and events space. The Council has constituted the Crystal Palace Park Trust as an independent body, with the Board of the Trust comprising local residents with expertise in charities, governance, parks and planning. We understand that a new policy is being produced by the Trust.

4. LEGISLATIVE FRAMEWORK

4.1.1 This section of the report reviews the relevant legislation, current national and local guidance and standards which are considered relevant to the application.

4.2 Licensing Act 2003

4.2.1 The explanatory notes to the Act state that it provides for a unified system of regulation of the activities of the sale and supply of alcohol, the provision of regulated entertainment, and the provision of late night refreshment. In the Act, these activities are referred to collectively as "the licensable activities".

4.2.2 The purpose of the system of licensing for licensable activities is to promote four fundamental objectives ("the licensing objectives"). Those objectives are –

- the prevention of crime and disorder;
- public safety;
- the prevention of public nuisance;
- the protection of children from harm

- 4.2.3 The system of licensing is achieved through the provision of authorisations through personal licences, premises licences, club premises certificates and temporary event notices. The objective regarding the prevention of public nuisance is most often linked to noise and the explanatory notes to the Act advise that “The four licensing objectives aim to ensure that the carrying on of licensable activities on or from premises is done in the public interest. The third licensing objective, the prevention of public nuisance, will not extend to every activity which annoys another person but will cover behaviour which, when balanced against the public interest, is found to be unacceptable.”
- 4.2.4 Applicants for a licence must demonstrate within their operating schedule the means by which they intend to meet this objective. When noise is being considered, Local Authority “responsible authorities” (typically Environmental Health departments), must have regard to this objective when considering making a representation or applying for a review of a Premises Licence.

4.3 Post Covid Implications to the Licensing Act 2003

- 4.3.1 In light of the serious economic impact the pandemic has caused to the UK’s social economy and events sector in particular, there is a growing consensus view that local authorities should treat the social economy as a “*social good*” to be supported and propagated. What was previously appropriate to promote the licensing objectives, may not be appropriate now and a more flexible response, appraising the risk to each of the licensing objectives and then deciding what is appropriate, rather than trying to obviate the risk, is now required.
- 4.3.2 This appreciation of the greater need for enhancement of the social economy in the context of Covid, will feed into the decision making process allowing more flexibility around regulatory control mechanisms, in terms of objective requirements such as numbers and frequency of events, decibel level of music etc, whilst still balancing the rights of those wishing to host and attend an event with the rights of the local community who may be negatively impacted by the event.

4.4 Public Nuisance

- 4.4.1 Responsible authorities and other persons (formerly “interested parties”) may make representations based on the public nuisance objective. Neither the Licensing Act 2003 nor the Statutory Guidance define public nuisance, although the Guidance states that licensing authorities should adopt the “broad common law” meaning.
- 4.4.2 Nuisance is assessed objectively in terms of factors including frequency of event, duration, time of day, absolute level, the nature and character of the area etc. and must materially and unreasonably interfere with the comfort of a person of typical noise sensitivity or the ordinary use of property.
- 4.4.3 Therefore, with respect to the promotion element of the public nuisance objective, operators and responsible authorities can place proportionate restrictions and conditions on a licence, where appropriate to ensure that noise from regulated entertainment is below the threshold for public nuisance; appropriate to the circumstances of the proposed or actual licensed

premises, taking into account those who may be affected by noise associated by the operation of a license.

5. NOISE GUIDANCE AND STANDARDS

5.1 Code of Practice on Environmental Noise Control at Concerts 1995

5.1.1 The Code of Practice first published in 1995, addresses environmental noise control at concerts and similar large music events involving high powered amplification when held in sporting stadia, arenas, open air sites and within lightweight buildings. The introduction to the CoP states:

Large music events involving high powered amplification are held in sporting stadia, arenas, open air sites and within lightweight buildings. These events give pleasure to hundreds and in some cases thousands of people. However, the music from these events can cause disturbance to those living in the vicinity. The purpose of this code is to give guidance on how such disturbance or annoyance can be minimised.

5.1.2 This is an important factor as the CoP predates the introduction of the Licensing Act 2003 where the relevant objective to noise, is the promotion of the prevention of public nuisance. It has therefore been argued that the threshold described in the CoP of “minimising disturbance or annoyance” is at a lower threshold than that the Licensing Act 2003 requires.

5.1.3 Various guidelines and criteria are described. For events held between 0900 and 2300 the Music Noise Level (MNL) when assessed at the prediction stage or measured during sound checks or concerts should not exceed the levels detailed in Table 2 below;

5.1.4 Section 4.3 of the CoP; *Research shows that music noise level in the audience by the mixer position is typically 100dB(A) and that levels below 95dB(A) will be unlikely to provide satisfactory entertainment for the audience.*

Table 2. Guideline Music Noise Limits

Concert days per Year	Venue Category	Guideline
1 To 3	Urban Stadia & Arenas	The MNL should not exceed 75dB(A) over a 15minute period
1 To 3	Other Urban & Rural Venues	The MNL should not exceed 65dB(A) over a 15minute period
4 To 12	All Venues	The MNL should not exceed the background noise level by more than 15dB(A) over a 15 min period

5.1.5 The Chartered Institute of Environmental Health Officers (CIEH) has set up a working party to review and update the current CoP. The author of this report is a member of the working party. A draft document is hoped to be available for consultation during 2021. Although we cannot discuss specifics of the document, the broad aim is to allow a more flexible approach reflecting how current practice has changed since the production of the CoP in 1995, the outcomes from research and bring the guidance up to date with legislative requirements.

5.2 Low Frequency Noise Criteria

5.2.1 The above 1995 CoP does not specify limits for low frequencies although there is a footnote with some helpful guidance. Whilst this is only a footnote, there have been an increasing number of councils who have adopted these low frequency limits.

5.2.2 The conclusions of the research behind the footnote state that:

- I. At open air venues, the increase over background 'A' weighted criterion works well at minimizing complaints near to a venue.
- II. The 'A' weighted criterion can underestimate annoyance at greater distances from the venue (in excess of 2km) as the mid to high frequency energy is quickly attenuated with respect to low frequency and the expectation of people living some distance from the event being that the concert should be inaudible.
- III. Sound pressure levels in excess of 80dB in the 63Hz or the 125 Hz octave bands recorded in excess of 2km from the concert, are likely to give rise to complaints of low frequency noise. Levels below 70dB are likely to be acceptable.

5.2.3 However, the effect of imposing a 70 dB limit in 63Hz and 125Hz bands within 1 Km of an outdoor open air venue is that it is often unachievable without substantially undermining the viability of the music event, and if adopted would prevent many concerts from taking place. Therefore, in practice, it has been found to be effective for multiple events to set a maximum external low frequency level in order to control some of the more excessive effects of certain types of music with specific "sub-bass" emphasis at higher low frequency levels; by setting L_{Ceq,T} limits at representative sensitive receptors in a range up to 90dB(C) or similar levels within individual octave or third octave bands.

5.3 Comparison with Other Urban Locations

5.3.1 Table 3 below details the permitted noise control limits at other urban park venues. It can be seen that several urban park venues operate successfully with music noise limits up to 75dB(A) with some parks imposing a low frequency noise limit of up to 90dB(C) and others not imposing any low frequency noise limit. This move away from the current CoP requirements in relation to numbers of events and guideline music noise limits has been with the approval of acoustic experts and local authorities (via the licensing process) and reflects the outcome of government research¹, which considered that there is no need for urban parks to have a lower permitted MNL than from urban stadiums, as the existing 1995 CoP suggests and that the majority of survey respondents supported higher numbers of events without causing undue annoyance.

¹ DEFRA 2011 Attitudes Towards Environmental Noise From Concerts –NANR 292

Table 3. Music Noise Limits for Other Urban Parks

Venue	Premises Licence Music Noise Condition	Nos Event per Year
Hyde Park – London Westminster City Council	75dB LAeq,5minutes LF limit at 2Km	13
Victoria Park – London LB Tower Hamlets	75dB LAeq,5minutes, No LF Limit	6
Heaton Park Manchester City Council	75dB LAeq,15minutes No LF limit	6
Queen Elizabeth Park (London) LB Newham	6 Concerts at 75dB and 4 Concerts at 65dB LAeq,15minutes	10
Clapham Common LB Lambeth	75dBA & 90dB(C) Leq,15minutes	8
Central East Park	75dB LAeq,15minutes	NA
Blackheath Common LB Lambeth	75dBA & 90dB(C) Leq,15minutes	8
Brockwell Park LB Lambeth	75dBA & 90dB(C) Leq,15minutes	8
Finsbury Park LB Haringey	75dB LAeq, 15minutes +LF limit in 1/3 octaves	6
Kennington Park LB Lambeth	75dBA & 90dB(C) Leq,15minutes	8
Streatham Common LB Lambeth	75dBA & 90dB(C) Leq,15minutes	8
South Park Oxford	75dB LAeq, 15minutes no LF limit	NA
Norwood Park LB Croydon	75dB LAeq, 15minutes no LF limit	8

Note LF=low frequency

5.4 Proposed Music Noise limits

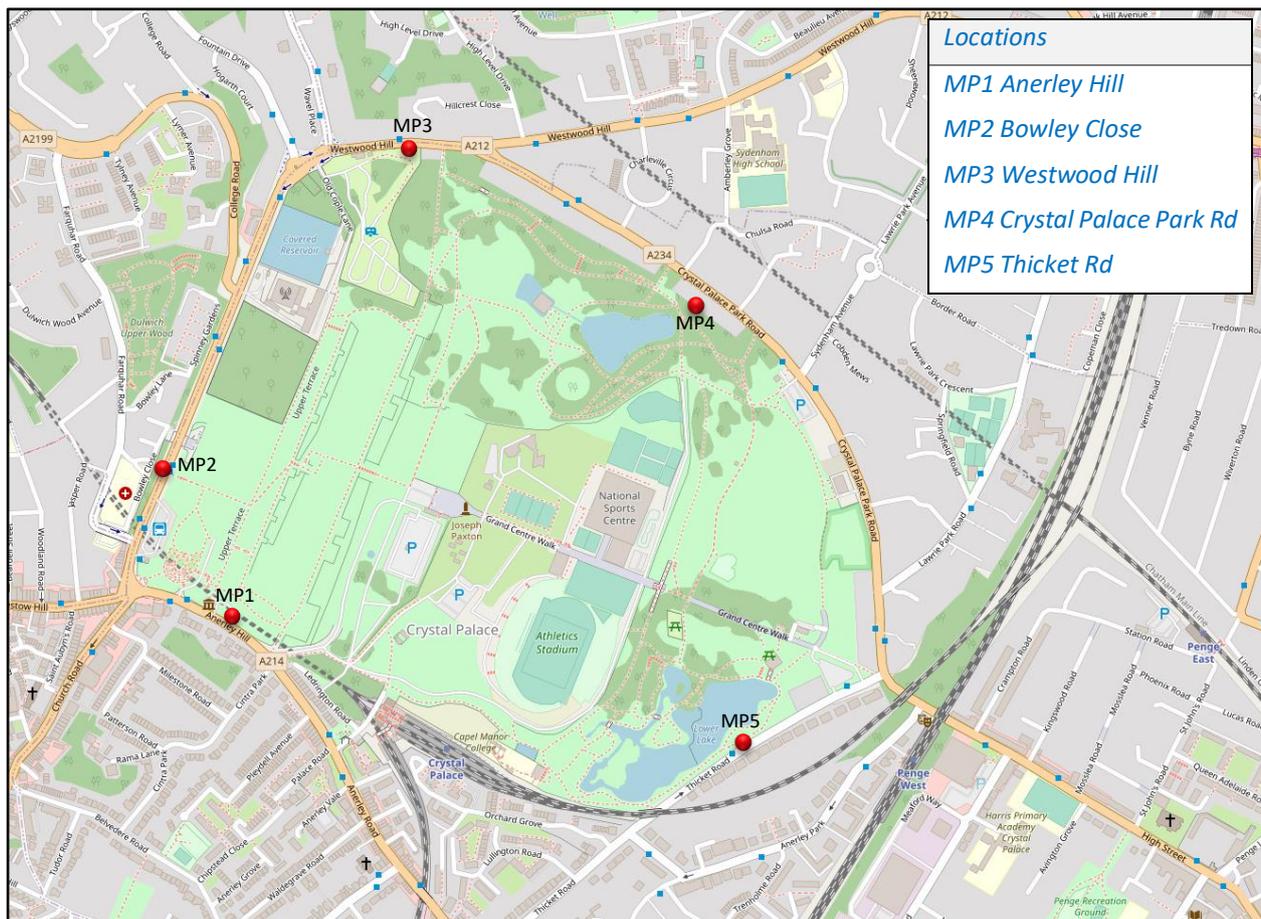
5.4.1 Proposed music noise limits are detailed in Table 4, proposed noise monitoring locations are presented in Figure 4 and will be agreed in advance with the Local Authority. Details on the rationale for the proposed limits are detailed in section 5.6.

Table 4. Proposed Music Noise Limits

Locations	Music Noise limit (MNL) 09.00-23.00
All Residential Receptors	75dB LAeq,15min

Note: The Music Noise Level (MNL) value is the LAeq,15minute, due to music measured at a the boundary with representative noise sensitive receptor locations detailed in Figure 4 below. An informal Low frequency noise limit of 90dB LCEq,15minute is also recommended

Figure 4. Proposed Noise Monitoring Locations



5.5 Rationale

- 5.5.1 The Licensing Act 2003 introduced the concept of preventing public nuisance, rather than the minimisation of disturbance which was required under the previous licensing regulatory regime. It is now recognised that the CoP no longer aligns with current circumstances and practice and is under review by the Chartered Institute of Environmental Health Officers.
- 5.5.2 A more flexible approach is considered appropriate, which is supported by evidence from other existing urban parks throughout London and the overarching objectives contained within LB Bromley's licensing policy statement, which aims to balance the noise impacts with social and economic benefits. Further to this Licensing Act 2003 Section 182 guidance states at para 2.17 *Licensing authorities should avoid inappropriate or disproportionate measures that could deter events that are valuable to the community, such as live music.* There is a long history of music events being held within the park and it is considered that without the flexibility of allowing MNL's in the region of 75dB(A) it would not be possible to attract artists or provide suitable entertainment levels for audiences. As previously stated the outcome of government research also indicated that urban parks do not need to be treated differently from urban stadiums and therefore it is considered that an MNL of up to 75dB LAeq,15minute is appropriate for this site.

- 5.5.3 It should be also noted that there is typically a graduated increase in music noise at the stage/s (CoP para 3.10) with lower levels for the support acts, which allows headline acts to achieve higher sound levels, up to the maximum levels, during an event. This maximum limit is managed through a dynamic response process by the acoustic consultant and sound engineers working together, by monitoring noise levels constantly during performances both internally and externally.
- 5.5.4 As can be seen from the noise modelling exercise below, a level 75dB will not be experienced at all residential receptors in the vicinity of the park, with only certain areas to the north and south experiencing higher levels from time to time. Also further sound system design will be undertaken with suppliers once appointed and the sound system will be able to be refined to reduce, noise exposure to the lowest levels possible whilst still providing suitable audience entertainment levels.
- 5.5.5 It is therefore considered that the proposed music noise limits levels, along with a robust noise management of events, will promote the licensing objective of the prevention of public nuisance and can achieve the Crystal Palace Park Trust events policy ambition.

5.6 MUSIC NOISE PREDICTIONS

- 5.6.1 In order to determine the sound propagation characteristics between the proposed music stage and those living nearby who might be affected by noise, music noise propagation modelling has been undertaken using d&b audiotechnik “noizcalc” proprietary software. Figure 5 presents the noise contour maps for the proposed layout.
- 5.6.2 The modelling has included the following assumptions :
- d&b audiotechnik Array Calc used to provide the speaker array based on generic J & V series. Further detailed system design will be incorporated into further iterations of the model.
 - Terrain data from Open Source maps. No perimeter fencing included at this time.
 - Stages 1 & 2 99dB(A), FOH Level, Live Bands Rock/Pop standard spectrum applied.
 - Perimeter Barrier 3.4High Steel Shield
 - Grid Height 1.5m, soft ground conditions for the park area..
 - Uncertainty +/-3dB

Figure 5. Noise Contour Map

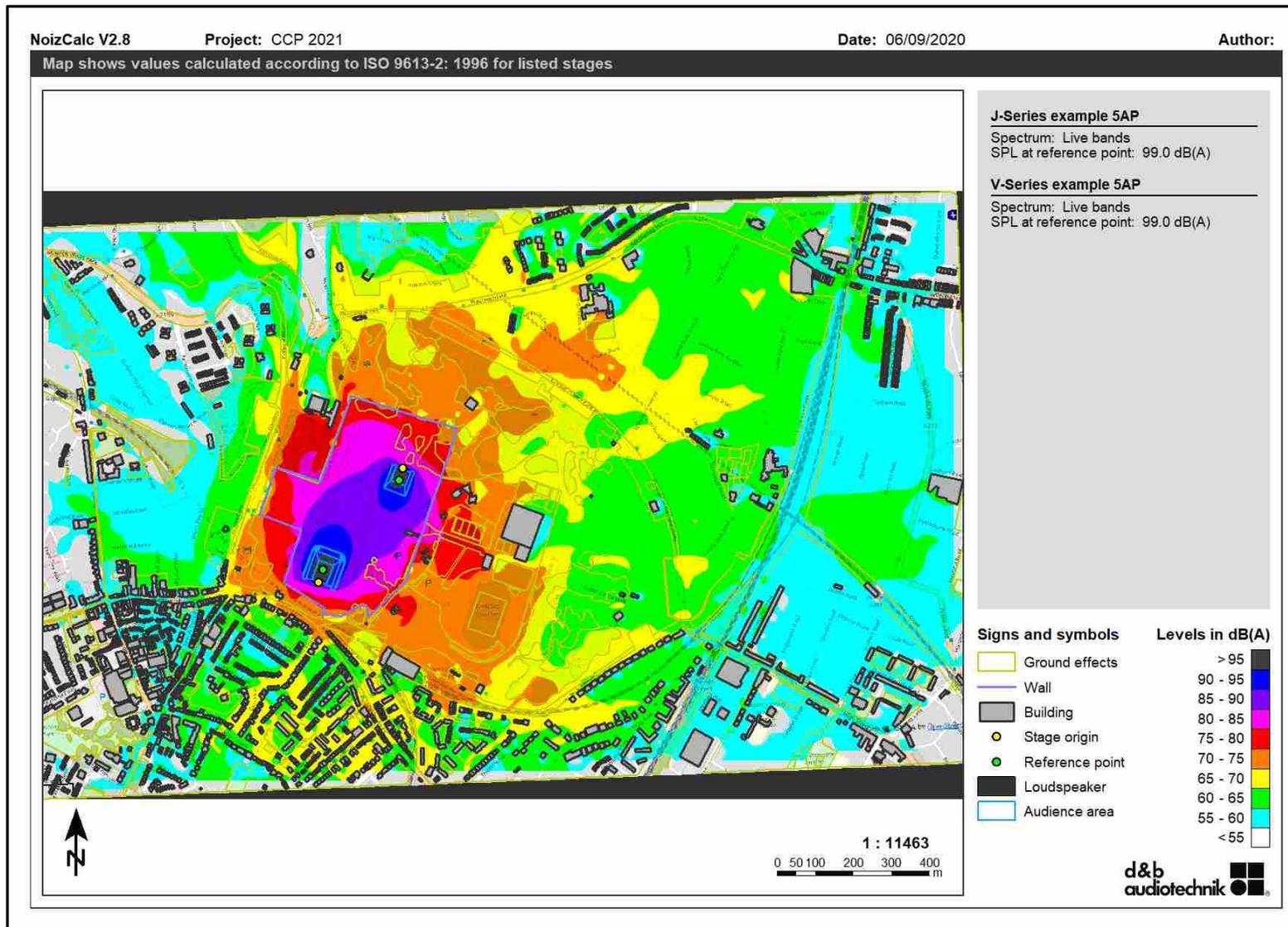


Table 5. Predicted Music Noise Levels

<i>Locations</i>	<i>Predicted Music Noise level dB(A)</i>
MP1 Anerley Hill	70-75
MP2 Bowley Close	65-70
MP3 Westwood Hill	65-75
MP4 Crystal Palace Park Rd	65-75
MP5 Thicket Rd	65-70

- 5.6.3 The noise modelling validates the site for use for music events, with music noise predicted to be below 75dB LAeq,15minute at broadly all noise sensitive receptor locations. Further detailed system design regarding the longitudinal and horizontal dispersion of the sound systems will be applied to mitigate potential noise spillage issues and reduce levels to below 75dB(A). In addition, level reductions will be made at FOH positions during propagation testing to ensure requirements are achieved.
- 5.6.4 Once the sound system provider has been appointed, further detailed sound system design can be undertaken and used in further iterations of the model with the objective to reduce noise spillages into community areas around the park.

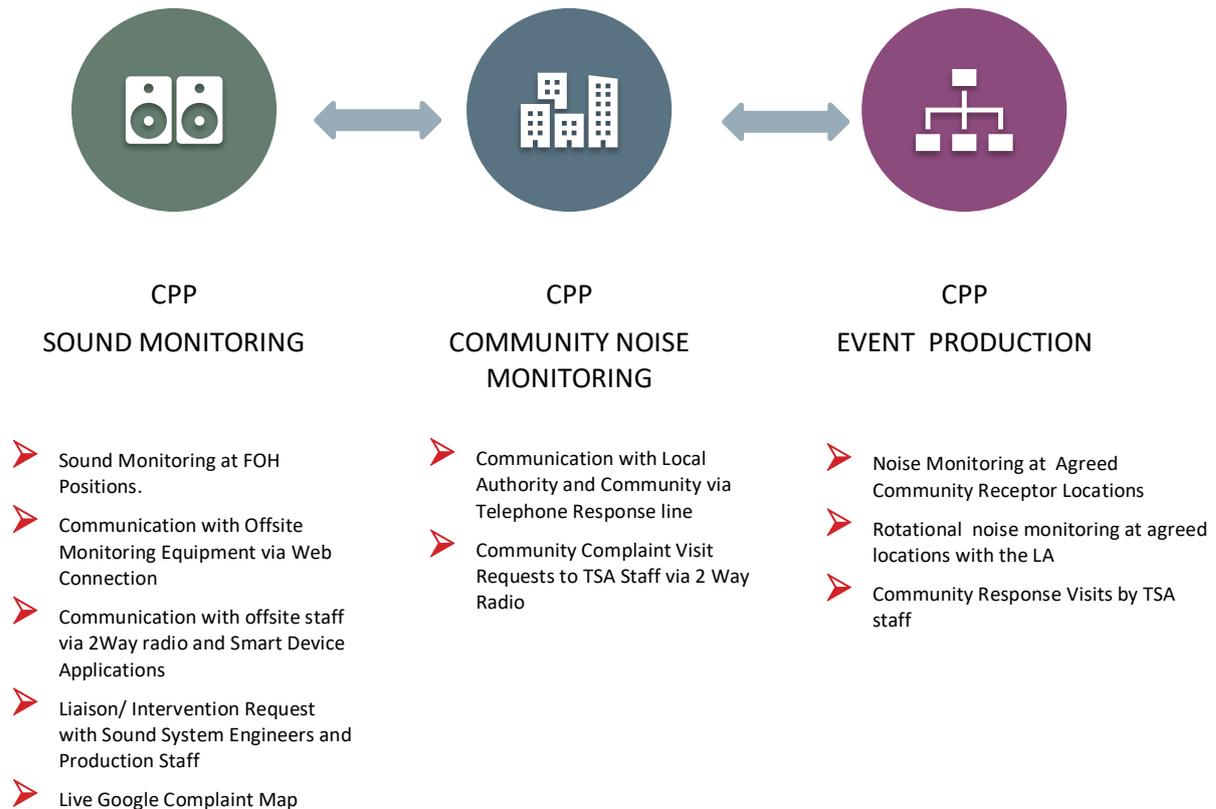
6. SOUND CONTROL PROCEDURES

- 6.1.1 In order to ensure that LA03 requirements are promoted and upheld, the following noise control procedures, that have been successfully used by TSA at other similar events, are recommended for outdoor events held at Crystal Palace Park. It is anticipated, as normally occurs, that the consultants carrying out the sound control program will work closely with the Environmental Health Officers from LB Bromley. An outline of the procedures is provided below.

6.2 Organisational Controls

- 6.2.1 TSA will work closely with both the sound system engineers and event management staff as well as liaising directly with LB Bromley Environmental Health and Licensing Officers as required. An example schematic of the communication and noise control process is presented in Figure 6 below.

Figure 6. Schematic of Communication and Noise Control Process



6.3 Pre-Event Information

6.3.1 The following pre-event procedures will be communicated to users of the site and residents.

6.3.2 The Event Manager/Production Manager will ensure that any visiting contractors and/or PA companies are advised of the noise constraints which relate to the site and details of this will also be contained within contractual documentation.

6.3.3 Residents will be informed of a contact telephone number (that will be attended by event management staff throughout the event) to enable them to register a comment/complaint with respect to noise. Residential properties should be contacted and will be advised of

- The times of the events including any amplified music
- The times of sound checks, propagation tests and rehearsal times
- A telephone number to contact in the event of a comment/complaint

6.3.4 Liaison will take place with the Local Authority's Licensing and Environmental Health Departments to agree aspects such as sound propagation test times, complaint logging and assessment and contact protocols. An example copy of the complaint log is presented in Appendix B

6.4 Sound System Design

6.4.1 The sound system provider has yet to be appointed however the following will form part of the system design.

- I. Use of Line Array sound system to increase audience focus and reduce noise pollution.
- II. Sound systems will be designed to reflect the audience size and type of music.
- III. Use of cardioid arrangement of the sub bass array will be deployed to assist in the reduction of low frequency noise on all stages e.g. d&B sub bass systems have built in 20dB rear rejection compared with ordinary point source ground stack systems.
- IV. Use of noise modelling techniques to provide optimum location and orientation of external stages to reduce noise pollution issues
- V. Graduated increase in music noise at the stage/s in order to allow a degree respite to the community and allow the headline acts higher sound levels than other acts.
- VI. DJ Monitors can sometimes cause noise pollution issues as they are typically configured as omni-directional subs to the DJs' left and right, facing each other and propagate sound energy as a point source equally in all directions. In order to reduce this we are investigating the use of a cardioid system behind the DJ facing the audience.
- VII. Installation of hoarding (where appropriate) at the rear of the stage area will also assist with sound reduction from stage back line monitors.

6.5 External Music Noise Limit Monitoring

- Semi-permanent monitoring station/s (see photo insert) with web connectivity will be utilised along with a central control point.
- Rotational monitoring at noise sensitive locations will be agreed with local authority
- Complaint visits undertaken upon request by resident or regulator



6.6 Sound Propagation and Pre-Event & Sound Checks

6.6.1 Sound propagation tests and sound checks will be carried out before the start of the event at dates and times to be agreed with LB Bromley. Propagation testing will involve playing pre-recorded music and broadcast sound through the sound systems and measuring sound levels simultaneously at the FOH positions within the site and at the specified monitoring locations.

The sound system can then be fine-tuned by using the PA characteristics and Digital Signal Processing, such that the maximum attenuation can be achieved from inside to outside the site and a maximum level can also be set at the mixer positions in order that Premise Licence conditions can be complied with. Pre event line checks will be at reduced sound levels wherever possible and sound checks will be limited in time and duration and agreed in advance with LB Bromley.

6.7 Sound Monitoring Control

- Music sound level monitoring at all stages for all events using noise management software system.
- Use of networked solution overseen at central control point with feedback to offsite equipment and / or personnel to ensure rapid response to noise issues if they arise.
- Intervention request through control hierarchy to ensure response enacted.

Figure 7. Example of Onsite FOH and Central Control Point Display



6.8 Community Engagement During Events

- 6.8.1 A telephone hotline will be maintained and monitored throughout events
- 6.8.2 Should complaints of music noise arise during the event, the details will be logged by the onsite Production Management Team and passed onto TSA, who will assess the music noise level at the closest permanent external monitor with the location details of the complaint. This will assist in building up a geographical picture of complaints.
- 6.8.3 Where a resident wishes for a consultant to visit, this will be undertaken (wherever practicable) and location measurements recorded. Where an intervention is necessary instructions will be conveyed by two-way radio communication with the central control point, with intervention instructions then relayed to the relevant sound engineer. A complaint log will be forwarded to the Licensing Authority upon request.
- 6.8.4 Throughout the event TSA will provide an event noise management team which will be constantly monitoring music noise and responding to community noise complaints throughout the duration of sound checks and events.

- 6.11.2 The events management team will inform concession stall holders and fairground ride operatives, should there be any, of the noise constraints that are required and will be periodically monitored by the noise consultant and action taken via the event management team if necessary.
- 6.11.3 During load in and load out of production equipment care will be taken if working outside normal working hours to limit any unnecessary noise and limit potential noise impacts on noise sensitive receptors in the vicinity of the site.

6.12 Noise Management Plan Review

- 6.12.1 The Noise Management Plan will be periodically reviewed in order that operating policy and regulatory requirements are being maintained and where possible systems will be enhanced to continually improve performance.

7. CONCLUSION

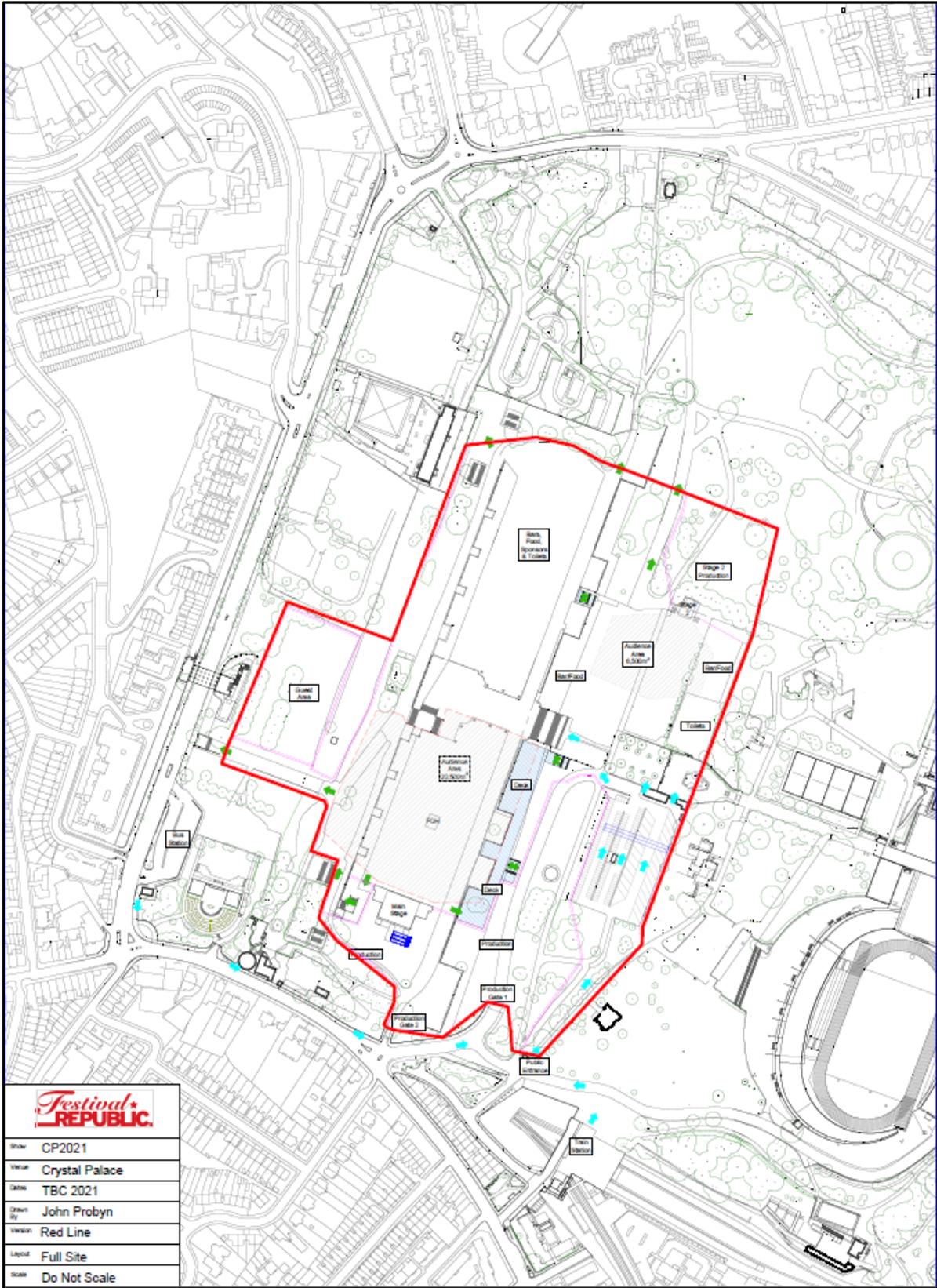
- 7.1.1 Three Spires Acoustics Ltd (TSA) has been commissioned to produce a draft Noise Management Plan for proposed outdoor events to be held at Crystal Palace Park in July of 2021. The draft NMP is a discussion document and further iterations will be produced and fine tuned once the local authority has appointed an officer to assess the draft NMP.

Music noise limits have been proposed along with justifications and are considered appropriate to promote Licensing Act 2003 objectives.

Noise prediction modelling has been undertaken which confirm that the site is viable to host multi stage events. A comprehensive noise management system, including sound system design, monitoring and community engagement will be implemented during the event and will be enhanced and amended as necessary following future discussions with the local authority.

It is therefore considered that the site is viable to host the proposed events and that the Noise Management Plan will promote the Licensing Act 2003 objective of the prevention of public nuisance.

Appendix A: Site Plan



Appendix B: Comment/Complaint Form

Crystal Palace Parks Concerts 2021	Noise Complaint/Comment
Date and Time Complaint Received	
Name of Complainant	
Address of Complainant	
Telephone number and email of complainant	
Location of noise disturbance (address & postcode if different from complainant address)	
Time disturbance noted	
Nature of complaint(Vocal, Bass, Music in General- Inside or outside)	
Additional Comment / Weather data	
Visit Requested Yes/No	
Action Taken	

Appendix C: Glossary of Terms

'A' weighting (dB(A)): A frequency dependent correction which weights sound to correlate with the sensitivity of the human ear to sounds of different frequencies.

Ambient Noise: A measure of the typical noise (excluding any unusual events) present at a site, or in a room. This is usually described in terms of $LA_{eq,T}$.

Audible: Sound that can be heard or is perceptible by the human ear.

Background Noise: A measure of the underlying noise (excluding any unusual events) which is present at a site before a new noise source is introduced. This is usually described in terms of the LA_{90} level: the sound pressure level exceeded for 90% of the time.

Decibel (dB): A unit used for many acoustic quantities to indicate the level of sound with respect to a reference level.

External Amenity Space: An outdoor area near to a residential building which is designed and intended primarily for leisure and recreational use by the occupants of the dwelling. This will include gardens, patios, balconies, roof gardens and terraces.

Hertz: The tonal quality of a sound is described and measured in terms of the frequency content and is commonly expressed as octave or third octave bands, the latter being the division of the octave bands into three for finer analysis, across the frequency spectrum. The smaller the octave band or third octave band centre frequency number defined in terms of Hz, the lower the sound. For example 63 Hz is lower than 500 Hz and is perceived as a deeper sound. The attenuation due to air absorption and natural barriers increases with frequency i.e. low frequencies are always the most difficult to control

Inaudible: Sound that cannot be heard or is imperceptible to the human ear.

$LA_{90,T}$: Sound pressure level exceeded for 90% of the measurement period "T" or 'background level'.

$LA_{eq,T}$: Equivalent continuous sound pressure level measured over the time period "T"

L_{Amax} : The maximum RMS A weighted sound pressure level

Music Noise Level (MNL): The Leq of music noise measured at a particular location.

Noise: Unwanted sound.

Noise assessment: A basic evaluation of an acoustic environment by a suitably qualified person to assist in the determination of a planning application..

Noise impact: the noise level of the source under consideration, and/or any change in noise levels due to the scheme, and/or the relationship between the noise level of the source under consideration and a descriptor of the existing noise climate; at a receptor or group of receptors.

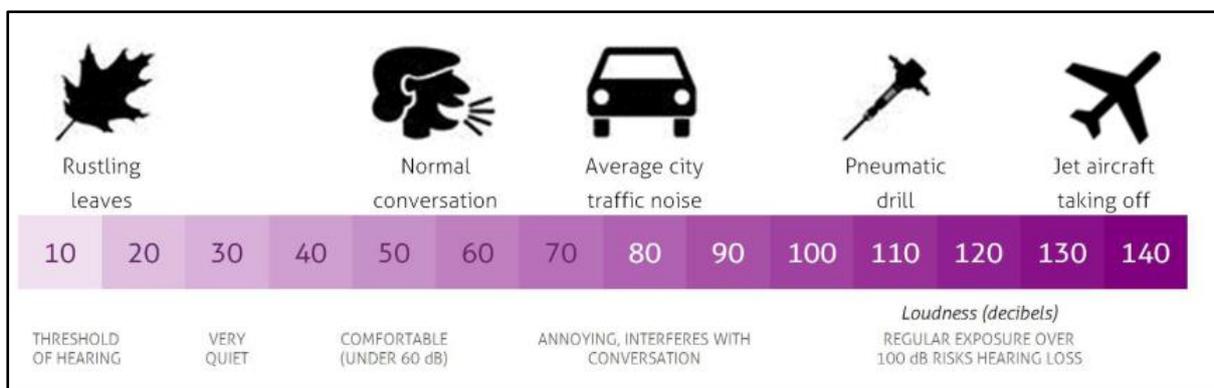
Noise effect: the consequence of the noise impact e.g. annoyance, sleep disturbance, speech interference, disruption of learning/teaching, health consequences, fauna displacement etc. Noise

impact and noise effect are related to each other and the noise effect is related to the magnitude of the noise impact as well as other factors e.g. sensitivity of the receptor, duration of the noise, how frequently it occurs, the time of day or night it occurs, whether the noise is temporary, reversible or permanent etc.

Noise level (Lp): the logarithmic measure of the RMS sound pressure of a sound relative to a reference value that represents the threshold of hearing. It is measured in decibels (dB) e.g. $L_p = 20 \lg(p/p_0)$ dB re 20 μ Pa for air.

Noise sensitive premises / developments: Principally comprising residential premises, hospitals, schools and hotels. Other premises and sites may be deemed to be noise sensitive depending upon circumstances.

Typical sound pressure levels



Appendix 2 Representations

Supporters and Objectors

Supporters

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park - music festival

Sent: 23 September 2020 15:34
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park - music festival

> Hi there,
>
> There's a flyer circulating regarding a potential music festival of "50,000 people" planned for
Crystal Palace Park which has encouraged people to email this address to voice their thoughts
(intention behind the flyer is that we write in and complain).
>
> Rather than complain, could I register my support for such events?
>
> I'm all for the park being used for large scale events, particularly involving music. (I'd love to see
the old bandstand with the pond back in action.)
>
> If any profit the park makes from hosting them is used for maintenance and upgrades of the
park itself, I'm in strong support.
>
> Many thanks
> London SE279PY
>

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00398/LAPRE

Licensing Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:41 PM on 24 Sep 2020 from .

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT

Proposal: Premises Licence

Case Officer: Steve Phillips

[Click for further information](#)

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Local Resident

Stance: Customer made comments in support of the Licensing Application

Reasons for comment:

Comments: 1:41 PM on 24 Sep 2020 Now more than ever it is important to support the music and performing arts sector. Live music events are so important for thousands of people's mental and physical health, as well as supporting to keep industry jobs alive.

Double, Paul

From: Licensing
Subject: FW: Wireless Festival

Sent: 28 September 2020 17:03
To: Licensing <licensing@bromley.gov.uk>
Subject: Wireless Festival

Hi,

I live in a house very close to Crystal Palace park SE19 2LH and I'm very happy for the festival to go ahead.

I feel the event helps put Crystal Palace on the map, stimulates the local economy and brings smiles to peoples faces for a few days.

Please try to keep litter, violence and antisocial behaviour to a minimum (or rather none in the case of Violence 🤬) but otherwise I'm happy.

I know many others here feel the same way.

Many Thanks,



PREMISES LICENCE APPLICATION

BY LIVE NATION (MUSIC) UK LIMITED

CRYSTAL PALACE PARK

Ref: 20/00398/LAPRE

REPRESENTATIONS OF CRYSTAL PALACE PARK TRUST

1. Crystal Palace Park Trust supports the application for a premises licence by Live Nation.

Crystal Palace Park

2. Crystal Palace Park is a Grade 2* listed historic park, the site of Paxton's Crystal Palace which was erected there in 1854 and finally burned to the ground in 1936.
3. The Park has passed through many hands, but was bequeathed to the London Borough of Bromley ("LBB") in 1985 on the demise of the Greater London Council.
4. While it is an attractive and much loved park, it is in need of significant capital funds to enable its restoration and to meet the needs of the communities living in the five boroughs which surround the Park.
5. In recent years, LBB has developed a regeneration plan which has as its core elements: (i) the physical regeneration of the Park, (ii) a new business model and (iii) the formation of a charitable trust to take over custodianship of the Park.

6. As to (i) the regeneration plan is the subject of an outline planning application which is for determination in late 2020.
7. As to (ii) LBB commissioned a business plan from Fourth Street, which projects running costs for the Park at in excess of £1m per annum. The majority of those funds are to be generated from events in the Park.
8. As to (iii) in 2016, LBB used an independent body to recruit a shadow Board for Crystal Palace Park Trust.

Crystal Palace Park Trust

9. The Trust was registered as a company limited by guarantee in 2018 and is presently applying for charitable status. The objects of the Trust, set out in its Memorandum and Articles of Association are as follows:

The Objects of the Charity are, for the public benefit:

(1) To preserve, protect, manage and improve the physical and natural environment of Crystal Palace Park in south London in particular, but not exclusively by protecting and conserving structures, monuments, landscapes, buildings and objects of architectural, historic, engineering, ecological or archaeological interest.

(2) To promote in the interests of health and social welfare, community participation in, and enjoyment of, Crystal Palace Park, in particular, but not exclusively by the provision of facilities for:

A. the playing of sports;

B. recreation and leisure time pursuits; and

C. arts, heritage and culture.

10. The Trust board comprises local volunteers, appointed following open recruitment processes, who are experts across the fields of finance, governance, law, planning,

fund-raising, events, heritage and landscape, communications and charities. The Board has constituted a Finance Sub-Committee, and Working Groups to advise on Events, Heritage and Landscape, Communications and Fund-Raising, comprising board members and expert members of the community.

11. The Trust meets with Bromley officers on a regular basis to discuss its progress, and has been greatly assisted by their guidance and expertise.
12. The Trust has also constituted a trading subsidiary, Crystal Palace Park Events Limited, which will covenant all of its trading profits to the Trust.

Events Policy

13. Having discussed the matter with LBB, the Trust identified an opportunity to work towards a medium term hand-over of events and potentially management of the Park. However, it recognised that to begin to operate in the Park in advance of the completion of the regeneration plan it would need to generate an income of its own. Hence in early 2020, the Trust consulted on a draft events policy, setting out parameters for events in the Park. The Policy was adopted in September 2020. Its stated purpose is as follows:

This Policy is intended to balance the interests of residents, park users, stakeholders and businesses and allow Crystal Palace Park Trust to:

- *Promote the Park as a venue for events to support the maintenance and regeneration of the Park.*
- *Promote best practice in all aspects of event management, including the event application process.*
- *Ensure that a sustainable number of events are permitted.*
- *Minimise, mitigate and manage the impact on the Park and surrounding areas.*
- *Encourage events that have strong community benefit and engagement and, where necessary, remove barriers.*

- *Support community event organisers and parks and open space user groups through the development of a streamlined event application process and upskilling event organisers.*
- *Improve communication and engagement with residents and business.*

Festival Republic

14. As a result of the consultation, the Trust began to be approached by most of the national organisations specialising in festivals, seeking to use the terraces for events. The Trust asked all those who had approached to bid for the right to operate festivals. Following a bidding process based on financial value, the quality of the promoter and the suggested events, the Trust Board elected to proceed with Festival Republic as a leading festival promoter, and one of the largest and most professional operating in the UK. While the terms of the contract are commercially confidential, the consideration under the contract is significant and will form the major part of the Trust's funding in years to come.
15. It is important to emphasise that all money the Trust raises in the Park will stay in the Park. The Trust has been running for four years and has not yet exhausted the £5,000 seed funding kindly awarded it by LBB. It is committed to ensuring that its income is wisely spent and is entirely for the benefit of the Park.
16. The Festival Republic Event is consistent with the Trust's Events Policy. The Trust sees very considerable advantage in the Festival Republic proposal, which operates on back to back weekends in July of each year. It much prefers this arrangement to the alternative of having two or more large music festivals on the terraces at different times of year.
17. The commercial benefit of the proposal is that it distributes the very large build costs over two weekends, thus saving costs and producing a larger revenue share for the Trust. The environmental benefit for the Park is that there is no need to bring any other large scale promoted music events onto the terraces at any other time of year, and ensuring that a planned approach can be taken to ground restoration following the event.

18. The benefit to the community is that local residents will have certainty as to the time of year at which large events may occur, rather than having to react to applications by different promoters at different times of year.
19. Perhaps most importantly, Festival Republic is a highly professional organisation and will, in the opinion of the Trust, deliver the event so as to minimise impact both within the Park and to the wider community.
20. The Trust expects that Festival Republic will work closely with the Safety Advisory Group in the production of a detailed Event Management Plan, which will cover all matters of potential concern, including for example, noise, litter, transportation and security. The Trust will also work with Festival Republic to ensure that the ability to access park facilities is maintained so far as practicable.
21. In addition, the Trust will employ its own experienced events professional to monitor the planning and delivery of the production and ensure that the contract, licence conditions and the event management plan are being adhered to.
22. The Trust will be working with Festival Republic to ensure that heritage and ecological assets are protected. Festival Republic has demonstrated to the Trust that it is alive to the key importance of these to the Trust and the community and that it will plan its work accordingly. The relevant experts overseeing this work will include those on the Trust Board and Working Group (which includes both historic and ecological expertise), Bromley's Conservation Officer and Historic England.
23. The Trust does acknowledge that there will be impact. It would be wrong to pretend that it is possible to run a large festival in a Park without it. The Trust has given the most careful consideration to the fair balance between impact and benefit. It seeks respectfully to make the following points.
24. First, Crystal Palace Park was built as an events space and has always operated as such. It has historically held very large concerts together with other events, including the FA Cup Final and motor-racing.
25. Second, in survey work, the holding of events in Crystal Palace Park has always been an expressed desire of local residents.

26. Third, the events themselves will be enjoyed by very large number of people both local and from further afield.
27. Fourth, despite the best efforts of many public and private sector bodies, the Park has suffered in condition and reputation for nearly a century. The bringing of these events together with the realisation of LBB's regeneration plan will be the foundation of a new financial model for the Park, and begin to restore the Park as an asset of at least national quality.
28. Fifth, the reality for many London Parks is that they have to be working spaces to make ends meet. Crystal Palace Park is no exception and has produced financial challenges that would have taxed any local authority. These events are an important part of the solution to those challenges.
29. Sixth, the Trust expects that the injection of funds from this event will enable it to begin operating in the Park during 2021. It is exploring using its early funds to:
 - a. employ staff, including the return of park wardens;
 - b. facilitate community events in the park;
 - c. restore the much-loved concert platform.
30. Seventh, these events will significantly reduce the number of large scale events the Trust needs to hold, in fact reducing them to far fewer than is contemplated in its events policy. It is currently in advanced negotiations to bring a series of sit down summer proms to the concert bowl. If that is also achieved and licensed, the Trust envisages that, beyond the Festival Republic and summer proms events, there will be no further large music events in the Park in years to come.¹ It is hoped that that is seen as an important commitment and a fair balance between the needs of the Park and the local residential community.
31. In summary, as is well-known, parks receive no statutory funding, and their financing presents challenges to the best-resourced public bodies. As a result, the holding of

¹ In July 2021, there will be one further weekend festival which was deferred from 2020 because of coronavirus which is not a Trust event. From 2022, the Trust will support only the back to back weekend event and the concert bowl summer proms.

events has become extremely important to fill funding gaps in many authority areas. These events will help LBB to capitalise on market demand for festivals in London and turn them to the benefit of residents across five boroughs, including the next generation. The events will also expedite the time when LBB can cease to meet the full finance costs of the Park and instead permit the Trust to absorb the costs subject to a much smaller annual grant.

32. National Guidance under section 182 of the Licensing Act 2003 states:

Licensing authorities and other responsible authorities should be alive to the indirect costs that can arise because of conditions. These could be a deterrent to holding events that are valuable to the community or for the funding of good and important causes. Licensing authorities should therefore ensure that any conditions they impose are only those which are appropriate for the promotion of the licensing objectives.

33. As to this, the Festival Republic events are extremely valuable to the community. Quite aside from the cultural value of the events, they will enable Crystal Palace Park Trust to enhance the ecological, recreational, historical and educational value of this precious historic asset.

34. Crystal Palace Park Trust therefore commends this application to LBB and asks that it be granted.

Crystal Palace Park Trust

30TH September 2020

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park Festival

Sent: 30 September 2020 19:43
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park Festival

Good evening,

I understand that licensing for a large festival in crystal palace park is currently being evaluated. I am a local resident living near crystal palace triangle - please register for the record my strong support for this and similar events, which I think will be good for the park and for the local economy and community. I hope it is approved.

Many thanks and kind regards,

SE19 3

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park festival

Sent: 30 September 2020 19:58
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park festival

Good evening,

I understand that licensing for a large festival in crystal palace park is currently being evaluated. I am a local resident living near crystal palace triangle - please register for the record my support for this and similar events, which I think will be good for the park and for the local economy and community. I hope it is approved.

Many thanks and kind regards,

Se19 3

Double, Paul

From: Licensing
Subject: FW: Festival in crystal palace.

Sent: 30 September 2020 20:08
To: Licensing <licensing@bromley.gov.uk>
Subject: Festival in crystal palace.

Dear whole it may concern,

I would just like so show my support for the festival you are proposing in crystal palace park. I think it is a great idea not just for the local shops, but also to have something so fun so close to home.

I do hope it gets the go ahead and people stop being such grumpy arse holes!!

Kind regards

Objectors

Double, Paul

Subject: FW: Festival Republic Crystal Palace Park Thicket Road Penge London SE20 8DT
Ref:20/00398/LAPRE deadline date 5th October 2020

From: Boyle, Samantha <Samantha.Boyle@bromley.gov.uk>

Sent: 28 September 2020 13:50

To: Hunter, Patrick antony <patrick.hunter@bromley.gov.uk>

Subject: RE: Festival Republic Crystal Palace Park Thicket Road Penge London SE20 8DT Ref:20/00398/LAPRE
deadline date 5th October 2020

Dear Patrick,

I object, the information at this point is insufficient in detail for us as a local authority to make a judgement at this current time under the prevention of public nuisance.

Kind regards

Samantha Boyle

Public Health and Nuisance

London Borough of Bromley

020 8461 7561 / samantha.boyle@bromley.gov.uk /Public Protection, Civic Centre, Bromley, BR1
3UH

Double, Paul

From: Licensing
Subject: FW: 20/00398/LAPRE

Sent: 18 September 2020 13:18
To: Licensing <licensing@bromley.gov.uk>
Subject: 20/00398/LAPRE

Dear Sir or Madam

I write to object to the application for a premises license to hold festivals at Crystal Palace Park (20/00398/LAPRE).

My main objection relates to the noise from events at Crystal Palace Park. I live in Lewisham and last year I had to call Bromley Council to make a complaint about the noise, which was travelling across from Crystal Palace to my home. Clearly, the nature of Crystal Palace Park, situated on a hill, means that sound travels very easily, a long distance, into a borough which is not even holding the event.

I would argue, the geography makes loud events unsuitable in this location and would prefer to have no loud festivals permitted in this park. In the event that permission is granted, the events must have limiters and monitoring sites which include the area where I live. There is no reason to grant a 3 year licence at once and I am unclear why it would need to allow music to be played between 11 and 10.30pm on any day of the week.

Aside from that, I would like to highlight the fact that public transport (trains) are quite limited and the park is a public space which should not be closed off to the highest bidder for events which are not accessible to the public (ie no children).

Kind regards
Priestfield Road
Forest Hill
SE23 2RS

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00398/LAPRE

From: ESD Planning (Group) <planning@bromley.gov.uk>
Sent: 22 September 2020 18:49
To: Licensing <licensing@bromley.gov.uk>
Subject: Comments for Licensing Application 20/00398/LAPRE

Licensing Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 6:48 PM on 22 Sep 2020 from.

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT
Proposal: Premises Licence
Case Officer: Steve Phillips
[Click for further information](#)

Customer Details

Name:
Email:
Address: Fountain Drive London

Comments Details

Commenter Type: Local Resident
Stance: Customer objects to the Licensing Application
Reasons for comment:
Comments: 6:48 PM on 22 Sep 2020 I support fundraising events to maintain the park. However, the impact of festivals on this scale on the local area and community is overwhelmingly negative. These festivals are clearly focused on commercial gain and not run for the benefit of the local community.

The park already has a concert facility in the form of the concert bowl which caters for a more reasonable number of festival goers, is in a more suitable area of the park to minimize noise, has a wonderful concert heritage and provides a much more special experience. Making use of this facility would be a benefit to the community.

Instead, 50,000 festival goers on any one day is too large a scale for such a suburban area. Crystal Palace has insufficient public transport capacity to deal with this number especially when the event closes. The problems caused by past events organised by Festival Republic highlight the negative repercussions of such a large event on local areas and the organiser's commercial interests.

The festivals' proposed situation on the park terraces is unsuitable as it lies in an elevated position from where the noise travels far. I was dismayed to hear how far the music carried from festivals that took place over summer 2019. Even though we do not live next door to the park, the noise sounded very close and we could clearly hear the announcements. Three long days of continuous amplified music and announcements constitute too large a loss of neighbours' amenity.

The duration and times of the festival over three days is unreasonable. The proposed end at 11pm will mean that children, key-workers and shift-workers will not go to sleep before then, which is particularly unfair on Sundays. The duration of the festival also means that a large part of the park will be blocked off from the use of the local community for a significant time over key summer weeks.

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park application

Sent: 24 September 2020 14:35
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park application

Hi

I am writing to express my support for Live Nation's application for a license in Crystal Palace Park. The park is a wonderful space but tragically under used and bringing business and recognition to the borough, and SE London as a whole, through this application is a great idea. Hopefully it will also encourage the council to care for the park in the way it deserves as well.

All the best

Crystal Palace resident

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park: Wireless Festival

Sent: 28 September 2020 13:06
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park: Wireless Festival

To whom it may concern - please see this email as my objection to the proposed issuing of a Live Nation license application for their event 'Wireless in the Park' in Crystal Palace Park.

As a resident with 2 children in Crystal Palace, I absolutely do not want the chaos and disruption that these events have known to cause in other London locations - with an increase in antisocial behaviour and unreasonable noise levels.

Regards,

Double, Paul

From: Licensing
Subject: FW: Applications by Live Nation to bring festivals to Crystal Palace Park

Sent: 28 September 2020 13:49
To: Licensing <licensing@bromley.gov.uk>
Subject: Applications by Live Nation to bring festivals to Crystal Palace Park

Dear Sir/Madam

I have been informed that a company called Live Nation have made a license application to bring up to 50,000 people to Crystal Palace Park next year as part of their "Wireless" festival series of events.

I object to this as follows:

1. The park does not have the capacity to safely hold anything like that number
2. Live Nation/Wireless events in other areas are always plagued with crime and disorder problems (drug and knife crime in particular). This is the subject of historical fact and can be researched
3. Wireless festival events produce excessive noise
4. Live Nation/Wireless never give legally required sufficient notice for the events they hold. Again this is historical fact and can be researched. Live Nation have not mentioned specifically what these events are. They could be musical events, political events (extremist or other), religious events, which I find offensive. This list is not exhaustive.
5. These events bring chaos to the local area which vastly outweighs the increase in commerce, and
6. The Head of Friends of Crystal Palace happens to be a QC representing Melvin Benn (a director of Wireless Festivals); this is a massive conflict of interests. I realise that Bromley currently a Tory council and conflicts of interest and nepotism are seemingly compulsory in the Tory Party, but I hope (perhaps against hope) that you will do the right thing and refuse this application.

Please reject the application.

Thank you for reading this.
SE26

(Approx 100m from one of the Crystal Palace Park entrances)

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 07/00638/LATEMP

Comments were submitted at 2:52 PM on 28 Sep 2020 from

Application Summary

Address: Crystal Palace National Sports Centre Ledrington Road
London SE19 2BB

Proposal: Temporary Event Notice

Case Officer: No case officer assigned

[Click for further information](#)

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Neighbour

Stance: Customer objects to the Licensing Application

Reasons for comment:

Comments: 2:52 PM on 28 Sep 2020 How can anyone be granted an open license for unlimited hours and days? I object to unlimited licenses being grant which may cause unlimited disruption to residents enjoyment of their lives.

Double, Paul

From: Licensing
Subject: FW: Live Nation / Wireless Festival License Opposition

From
Sent: 28 September 2020 15:32
To: Licensing <licensing@bromley.gov.uk>
Subject: Live Nation / Wireless Festival License Opposition

Hello,

As a resident of Crystal Palace Park Road for 33 years, I am writing to object to the Live Nation licence application, which aims to bring large scale festivals to Crystal Palace Park. I believe these festivals will bring knife and drug crime. One only has to look at The Lewisham festival, a much smaller event, that is often plagued with gang stabbings and anti-social behaviour. Therefore, I am writing to showcase my objection to this festival and do not want it in Crystal Palace Park. Let Brockwell Park host it.

Thanks

Double, Paul

From: Licensing
Subject: FW: Wireless festival Crystal Palace park

-----Original Message-----

From:
Sent: 28 September 2020 15:59
To: Licensing <licensing@bromley.gov.uk>
Subject: Wireless festival Crystal Palace park

Dear Sir/Madam,

As a resident of Crystal Palace Park Road I wish to make a strong objection to the proposed licensing of the Wireless festival at Crystal Palace park on a number of points.

1 with the global pandemic and no vaccine in sight I think this is highly irresponsible. We are trying to stop transmissions not accelerate them.

2 the area is over congested as it is and holding events such as these would increase both air and noise pollution.

3 there has been no event specific name so we cannot undertake more research.

4 wireless events have a history of knife and drug crime.

5 current festivals/raves bring anti social behaviour. With the proposed numbers this would be horrific.

6 the events would add an extra burden to already Under funded and over stretched emergency services.

Yours Sincerely

Double, Paul

Subject: FW: Concern re: events at Crystal Palace Park

Sent: 28 September 2020 17:10

To: Licensing <licensing@bromley.gov.uk>

Subject: Concern re: events at Crystal Palace Park

Hello,

My family and I live very close to Crystal Palace Park. We are concerned to hear consent may be given permitting large public gathering events in the park. Resulting in huge volumes of people, traffic, noise, anti social behaviour, crime and pollution of park and surrounding neighbourhoods.

I strongly object to such activities being given the go ahead and seek reassurance that requests to hold such events will be declined.

Kind regards

Charleville Circus resident

Double, Paul

From: Licensing
Subject: FW: Objection to live nation wireless in Crystal Palace park

Sent: 29 September 2020 10:30
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection to live nation wireless in Crystal Palace park

Dear Sir/Madam,

I am writing to object to the above festival coming to crystal palace park.

I have concerns about anti social behaviour and noise, especially based on what I've heard about this event in other locations.

Yours sincerely

Double, Paul

From: Licensing
Subject: FW: Objection to Live Nation / Wireless Festival

Sent: 29 September 2020 16:26
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection to Live Nation / Wireless Festival

I have come across mentions of plans to host Wireless Festival at Crystal Palace Park on social media. I would like to formally register my strongest objections to these plans.

I cannot see any blue notices in the park so am not sure what the consultation period is etc. But given past experience of music events in the park, and the numbers of attendees mentioned I am strongly objecting to it on grounds of safety and ability to peacefully access my property and not suffer horrific littering, noise pollution or anti social behaviour.

This park is a community park, heavily used by families and local residents who have no access to outdoor space otherwise. It is not an events venue.

I won't even go into the traffic congestion concerns, or the rumours of conflicts of interests between organisers of these events and the Friends of Crystal Palace Park. The very fact that there has been no public consultation is a huge concern.

Regards,

Double, Paul

From: Licensing
Subject: FW: Object against Festival Republic/ live nations uk music ltd

Sent: 30 September 2020 10:40
To: Licensing <licensing@bromley.gov.uk>
Subject: Object against Festival Republic/ live nations uk music ltd

To whom it may concern,

I would like to officially object to the license for Live Nation Uk Music Ltd for a number of reasons I am a local resident for many years. The park could just about cope with tranmission festival which was for 10,000 people, how could it cope with 40,000 plus people. The traffic, the noise, the litter was really bad plus that festival and others finished earlier.

Please say no to this festival organisation.

Kind Regards

Double, Paul

From: Licensing
Subject: FW: Objection to Live Nation/Wireless Festival in Crystal Palace Park

Sent: 29 September 2020 22:17
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection to Live Nation/Wireless Festival in Crystal Palace Park

I am writing to object to the Live Nation / Wireless Festival coming to Crystal Palace Park in 2021.

Wireless Festival has a terrible reputation for anti-social behaviour. I lived in Finsbury Park during the time when the festival was happening and it was an utter nightmare for all residences. It caused such tension and hostility and a general fear of the masses of young people and antisocial behaviour occurring.

Festivals such as wireless have a history of knife and drug crime and as a young woman I do not want to feel vulnerable in my own neighbourhood while the festival is taking place.

Festivals such as wireless are a matter of public nuisance with excessive noise and significant amounts of antisocial behaviour.

Please do not allow this festival to happen in Crystal Palace.

Double, Paul

From: Licensing
Subject: FW: Stop Live Nation/Wireless Festival

Sent: 30 September 2020 11:51
To: Licensing <licensing@bromley.gov.uk>
Subject: Stop Live Nation/Wireless Festival

Hi there,

I am writing to object to Live Mation/Wireless festival coming to Crystal Palace park next year. Please stop this from happening.

For the reasons:

There is no mention of the event specific name so we can undertake more research.

Current festivals bring anti social behaviour so the numbers could be concerning.

This event has a history of knife and drug crime.

Kind regards,

Double, Paul

From: Licensing
Subject: FW: Objection

Sent: 30 September 2020 12:09
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection

To Whom it may concern

As a resident on Anerley Hill I would like to object to the application by 'Live Nation' to bring festivals for huge numbers of people to Crystal palace Park.

Currently whenever there are large gatherings in the park eg. the firework displays, fun runs, music festivals we experience a huge increase in anti-social behaviour, traffic congestion and pollution. Following such events the roads and areas surrounding Crystal Palace Park are often left in a terrible state from littering, graffiti tagging, open drug taking and selling outside and within the park confines plus our own property gets used as a public parking facility and public toilet. When confronted the perpetrators are mostly aggressive and abusive. In the past we also have regularly experienced noise pollution from these events, loud music, tannoys, thumping bass that rattles our interior glazing.

During the Covid 19 lockdown earlier this year there were impromptu gatherings in the local parks which were hugely disruptive to local traffic routes, were noisy, were intimidating if you wanted to enter the park for exercise or leisure use and left a disgusting amount of litter including huge quantities of nitrous oxide cannisters in the grass and on public pathways.

The events that Live Nation are applying to host in Crystal Palace have no guarantees that they will be policed responsibly, there is no mention of what the event will entail eg. times of day/night the events will be held, how many days such 'festivals' might go on for, sales of alcohol or number of music stages/PA systems or the number of attendees. Binging 50,000 people to an area like this is utterly irresponsible especially under current circumstances. On no account should a speculative and vague licence such as this be granted to any company.

Regards

Double, Paul

From: Licensing
Subject: FW: Registration of objection

Sent: 30 September 2020 12:22
To: Licensing <licensing@bromley.gov.uk>
Subject: Registration of objection

To Whom it may concern

I am writing to you as a director of a block of flats on Anerley Hill and on behalf of the owners & residents of this building.

We would like to strongly object to the application by 'Live Nation' to bring festivals for up to 50,000 people to the Crystal Palace Park.

In the past when there have been large gatherings in the park across the road from our property eg. the firework displays, fun runs, music festivals we have experienced an increase in anti-social behaviour on Anerley Hill. This has taken the form of traffic congestion and pollution, littering, graffiti tagging, open drug use and selling - plus this property is used as a public parking facility and public toilet by attendees to such events. When residents and management have confronted the perpetrators they have been aggressive and abusive. In the past we also have regularly experienced noise pollution from these events, loud music, tannoy, thumping bass that rattles our interior glazing. This had had a negative impact on our lives.

During the lockdown in Spring this year there were impromptu gatherings in the local parks which caused disruption to local traffic and were noisy, intimidating (preventing local families from using the park for exercise and recreation. A disgusting amount of litter including huge quantities of nitrous oxide cannisters was left in the grass and on public pathways following these 'gatherings'.

The events that Live Nation are applying to host in Crystal Palace come with no guarantee that they will be policed by security responsibly, there is no mention of what the events might be eg. times of day/night the events will be held, how many days such 'festivals' might go on for, sales of alcohol or number of music stages/PA systems or the number of attendees. Bringing 50,000 people to an area like this is utterly irresponsible especially considering we could have the Coronavirus in the community for the foreseeable future. On no account should a speculative and vague licence such as this be granted to any company.

Regards

**The Management Committee
Grosvenor Court (Anerley Hill) Ltd**

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00398/LAPRE

Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:24 PM on 30 Sep 2020 from.

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT

Proposal: Premises Licence

Case Officer: No case officer assigned

[Click for further information](#)

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Residents Association

Stance: Customer objects to the Licensing Application

Reasons for comment:

Comments: 1:24 PM on 30 Sep 2020 Events of this size and nature (some 45,000 visitors [per day]) should not be held in the middle of a residential area.
The anti social behaviour, noise pollution, drug taking, park damage etc caused when such a festival was held in Finsbury Park led to campaigns against a licence renewal.
The park is there for the benefit of residents. Having parts of it shut due to setting up, dismantling and then the long process of restoration afterwards isn't appropriate.

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00387/LAPRE

Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 1:30 PM on 30 Sep 2020 from.

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT

Proposal: Premises Licence

Case Officer: No case officer assigned

[Click for further information](#)

Customer Details

Name:

Email:

Address:

Comments Details

Commenter Type: Residents Association

Stance: Customer objects to the Licensing Application

Reasons for comment:

Comments: 1:30 PM on 30 Sep 2020 Events of this size and nature should not be held in the middle of a residential area. It encourages anti social behaviour, noise pollution, traffic pollution, drug taking, park damage etc
The park is there for the benefit of residents. Having parts of it shut due to setting up, dismantling and then the long process of restoration afterwards isn't appropriate.

Double, Paul

From: Licensing
Subject: FW: Proposed Wireless festival 2021

Sent: 30 September 2020 20:58
To: Licensing <licensing@bromley.gov.uk>
Subject: Proposed Wireless festival 2021

I live on the border of Forest Hill and Crystal Palace and did my Horticultural training in Crystal Palace Park and do not want this festival to go ahead. The levels of destruction to this park and surrounding areas caused by this festival due to noise, alcohol consumption, huge crowds on our roads and its associated pollution levels are unwanted and unrequired. We need to preserve the way of life of local residents who live here and moved here for the peace and quiet.

Please dont allow this to take place.

, SE23 3

Double, Paul

From: Licensing
Subject: FW: Wireless festival objection

Sent: 30 September 2020 21:11
To: Licensing <licensing@bromley.gov.uk>
Subject: Wireless festival objection

I would like to raise an objection to the proposed festival next year in Crystal Palace park. As a local resident the noise, traffic and anti social behaviour would be intrusive. Please refuse the licence.

Double, Paul

From: Licensing
Subject: FW: Live Nation/Wireless Festival

Sent: 01 October 2020 07:42
To: Licensing <licensing@bromley.gov.uk>
Subject: Live Nation/Wireless Festival

Too whom it may concern....

It has come to my notice that an application for a licence to hold festivals at Crystal Palace Park has been applied for. This causes me great concern for many reasons.

The track record for these festivals is not great. There will be increased crime and drug usage around the area. Around the park it is residential. I don't actually live around it, I live in Forest Hill. We can hear it all when there is anything going on.....which means the sound travels far and that will be lots of households being disturbed. What about the people that have to work.....doctors and nurses, police, fire....all doing shift work.

I was born in this area 68 years ago, I have seen lots of changes. But I will be concerned about the historical park being trashed. There is lots of history here, it's not just a wide open space for this kind of thing, where there are no people living by, to have their lives disrupted for however many days.

Yes we had the music bowl back in the 70s. but life was different and it was more contained, although you still had a few problems. Nothing on this scale.

I don't understand why you would agree to this, knowing the problems it will cause, to the local community and surrounding area. Our emergency services will be stretched. Not to mention, there is a Pandemic going on!

I find this whole application totally unreasonable for the community living here, and there are a lot.

I am all for young people, having their music and doing what they do, but to inflict it on 1000's of people that don't like, and can't get away from it, (i.e. disabled people, people that can't afford to go away, people that have to work, families with young children), seems totally unreasonable, in such a populated area.

Bromley Council, I appeal to you to consider this very carefully.

Double, Paul

From: Licensing
Subject: FW: Live Nation / Wireless Festival

Sent: 01 October 2020 09:48
To: Licensing <licensing@bromley.gov.uk>
Subject: Live Nation / Wireless Festival

Good Morning,

I want to add my opposition to the Wireless Festival hosting events in Crystal Palace park. Events bringing in up to 50,000 people will only destroy the area and create unnecessary crime and violence. Look at other events of this nature and the impact it had on those communities. Our area is struggles with the CP Live event which doesn't get anywhere near the crowds this event does.

Our park is a beautiful place for families and locals to spend their time and enjoy nature and tranquillity please leave it this way.

Regards,
Crystal Palace SE19

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00398/LAPRE

Comments were submitted at 2:55 PM on 01 Oct 2020 from.

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT
Proposal: Premises Licence
Case Officer: No case officer assigned
[Click for further information](#)

Customer Details

Name:
Email:
Address:

Comments Details

Commenter Type: Neighbour
Stance: Customer objects to the Licensing Application
Reasons for comment:
Comments: 2:55 PM on 01 Oct 2020 Considering the "pandemic" situation in the world at the moment, it would perhaps be best for the Council, and planning committee to delay all applications for events with over 1000 people until there is clarity about when Covid 19 can be controlled. This would save wasting precious Councillors time on things which are unlikely to be possible for some years, especially when there are many other pressing concerns.

The is still very great uncertainty about the immune response to coronaviruses this means that there is still little chance of predicting when, or how, the outbreak ends. If as it so far appears to be the case that Covid 19 responds in the same way as known coronaviruses do, then there will be no successfully vaccine. It is a very dark thought which everyone would like to avoid, but at the moment it seems likely that Covid 19 will be like a very severe cold that every year much of the population will succumb to.

I object to the Council planning committee, and planning staff wasting their time on the pros and cons of large festivals in Crystal Palace park, when following current political thinking it will be many years or never that the government permits gathering of such a size.

Double, Paul

From: Licensing
Subject: FW: LIVE NATION /WIRELESS

Sent: 01 October 2020 16:08
To: Licensing <licensing@bromley.gov.uk>
Subject: LIVE NATION /WIRELESS

DEAR SIR I CANNOT BELIEVE YOU ARE CONSIDERING APPROVING THE LIVE NATION LICENSE APPLICATION FOR A WIRELESS FESTIVAL IN CRYSTAL PALACE PARK

DO YOU NOT KNOW THERE REPUTATION FOR ANTI SOCIAL BEHAVIOUR EXCESSIVE NOISE AND DRUG CRIME I MUST OBJECT MOST STRONGLY TO ANY

LICENSE BEING ISSUED TO THEM FOR THIS EVENT NEXT YEAR OR ANY OTHER YEAR

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park and Wireless festival

Sent: 02 October 2020 12:55
To: Licensing <licensing@bromley.gov.uk>
Subject: Fwd: Crystal Palace Park and Wireless festival

Subject: Crystal Palace Park and Wireless festival

To Bromley Council,

I wish to make a very strong protest about the proposal to allow Wireless to hold events in Crystal Palace Park.

1. It will put much of the park out of action for the local population.
2. The roads are unable to handle the volume of traffic this will generate as they are mostly old and narrow. Already there are huge traffic jams around the Triangle because of Croydon's low traffic actions, which are beginning to effect other local roads as drivers try to find ways to avoid the queues. This will also increase the air pollution in the district.
3. Public transport is insufficient to handle large crowds. There is currently only a half hourly Southern train service from Victoria, and similar from London Bridge. The Overground runs only every 20 minutes. Only one bus runs into central London - the 3.
4. The noise generated by such events is likely to be at a level that interferes with the sleep of children and elderly residents over a large area around the park.

Yours sincerely,
SE19 1PA

Double, Paul

From: Licensing
Subject: FW: Objection against the premises licence application for Live Nation (Music) - Crystal Palace Park

Sent: 02 October 2020 17:17

To: Licensing <licensing@bromley.gov.uk>

Subject: Objection against the premises licence application for Live Nation (Music) - Crystal Palace Park

Dear Licensing,

I'm writing to object to the premises licence application by Live Nation Music UK Ltd on the grounds that I do not think it will uphold the licensing objectives. I am a resident living within a 2 minute walk of the park and as such use it nearly everyday for exercise. When events have previously been on here I have had extreme issues with noise when the wind blows down towards the bottom of the hill Crystal Palace is situated on.

Please see my reasons below.

Protection of Children from Harm

- 50,000 people descending on the park on the same day will make the park an unsafe place for children to attend. The park is a haven for young families who walk around the park and use its facilities such as the playpark and its flat tarmac for rollerblading and bike riding.
- Through the sale of NOS at many large scale events, there are often metal canisters littered over parks which small children or the many dogs that are walked in the park could choke on.

Prevention of Crime & Disorder

- Criminal activity takes place at these events in the form of drugs, knife crime etc.

Uphold Public Safety

- Sale of NOS
- Covid-19 – things are currently quite uncertain and masses of people congregating to the area, especially around the public transport links including the bus station at the top of the park and outside the entrance to the train station will cause overcrowding and no way of legally social distancing.

Kind regards

, London SE19

Double, Paul

From: Licensing
Subject: FW: Live Nation Music Ltd

Sent: 02 October 2020 22:58
To: Licensing <licensing@bromley.gov.uk>
Subject: Live Nation Music Ltd

Please accept this as my objection to the above application for festivals/events at Crystal Palace Park.

This is not the type of event we need in this area (their reputation speaks volumes) and I feel this will have a huge impact on the community.

Kind regards,

Double, Paul

From: Licensing
Subject: FW: Live Nation Music Ltd

Sent: 02 October 2020 23:00
To: Licensing <licensing@bromley.gov.uk>
Subject: Live Nation Music Ltd

Please accept this as my objection to the above application for festivals/events at Crystal Palace Park.

This is not the type of event we need in this area (their reputation speaks volumes) and I feel this will have a huge impact on the community.

Kind regards,

Double, Paul

From: Licensing
Subject: FW: NO TO WIRELESS FESTIVAL

Sent: 03 October 2020 07:12
To: Licensing <licensing@bromley.gov.uk>
Subject: NO TO WIRELESS FESTIVAL

Hi

Please don't allow this festival to ruin Crystal Palace. I go to most festivals but this one attracts a huge amount of violence and attracts complete scumbags. People will sell their houses and people don't want to buy here if you allow this to happen.

I'm a young person and love festivals but I'm telling you now if this happens, Crystal Palace will be ruined.

Please please please don't let this happen.

Double, Paul

From: Licensing
Subject: FW: Objection to Live Nation

Sent: 03 October 2020 07:59
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection to Live Nation

Hi,

I would like to officially reject live nation being able to put on festivals at Crystal Palace Park specifically Wireless Festival.

From someone who used to go to wireless at Hyde Park and Finsbury I can categorically say it has progressively got worse over the years in terms of the level of violence to the point where 3 years ago we decided never to go back the festival.

Since then I have heard first hand from my friends it has got worse with people trying to jump fences, fights, stabbings, gangs and local pubs and shops in Finsbury Park getting smashed up.

You can literally find hundreds of videos on YouTube/twitter/instagram to back this all up as over the years there have been way more incidents than any other festival in London.

To be clear I am a huge festival fan and Crystal Palace is all about supporting independent festival which is one of the reason we moved to Crystal Palace.

Wireless does not fall into this category and there is a reason it has moved around so much because of the crowd it attracts and the impact it has on the local area.

As a resident I am all for smaller independent festival/ and concerts to be in Crystal Palace Park but do not want Wireless festival or Live Nation Events be held here.

Double, Paul

From: Licensing
Subject: FW: Objection to Wireless Festival

Sent: 03 October 2020 18:08
To: Licensing <licensing@bromley.gov.uk>
Subject: Objection to Wireless Festival

Dear Bromley Council,

I would like to register my objection to Wireless Festival & other Live Nation events taking place at Crystal Palace Park. I am a local resident (SE19 1QJ).

The UK festival culture is important and one I fully support. However, there are many other independent festival organisers who need support and who have previously had their licences rejected by Bromley Council.

Wireless Festival & having events of +40k people will be a huge strain on the local area and previous areas have complained of large numbers of people who have not been respectful, including urination and noise complaints.

I think it's important for Bromley to focus on supporting local communities and independent providers instead of a large corporation which is dominating the industry in a negative way.

Kind regards

Double, Paul

From: Licensing
Subject: FW: opposition to proposal to grant license to Live Nation

Sent: 03 October 2020 20:50
To: Licensing <licensing@bromley.gov.uk>
Subject: opposition to proposal to grant license to Live Nation

Dear Bromley Council,

I was upset to read about your consideration of a licensing application to Live Nation for the use of Crystal Palace Park as an ongoing music venue for up to six events a year between June and August every year.

I would like to strongly oppose the application.

I am a local resident and live on Anerley Hill, opposite Crystal Palace Park. I suffer the consequences every time you grant requests for Crystal Palace Park to be used for such events.

I have no objection to the park being used for community events which appeal to the whole community, **once or twice a year**, but you are increasingly allowing the park to be used for events that do not attract the local community and on a too frequent basis.

Last summer, in 2019 you allowed Live Nation to host an event in the park and we had to endure noise pollution, anti-social behaviour and great inconvenience as a result. This particular event resulted in our private car park and garden being used as a place for those attending the event to urinate and vomit. Attendees at the event parked in our private car park and were abusive and threatening when asked by residents not to park in their allocated resident's car parking spaces. The road outside our flats became congested and chaotic and the queue of traffic spanned down the hill at great inconvenience to any local residents wanting to go about their weekend chores. During the event the volume of the music was so loud that I could not even drown it out by playing my own music or putting on the television in my own flat. This went on for hours. I could not have my windows or back door open despite it being a very hot day. If you give permission for Live Nation to run up to 6 events between June and September that means that more frequently than once a month over the summer we are going to have our garden used as a toilet and I'm going to be uncomfortable in my own home. When I bought my flat, I was not moving to live opposite a music venue. I am certain that you, yourselves would not choose to subject yourself to such nuisance, I request that you do not make the active decision to do this to us either.

Furthermore, with such a frequency of these events taking place in the park, it stops the park being available for the use of local residents, the park will be forever cordoned off by the events teams.

It will be with great disrespect and lack of consideration for the local residents if you choose to grant the requested licensing application to Live Nation.

Double, Paul

From: Licensing
Subject: FW: Stop live nation/wireless festival at Crystal Palace Park

Sent: 04 October 2020 15:32
To: Licensing <licensing@bromley.gov.uk>
Subject: Stop live nation/wireless festival at Crystal Palace Park

Excess noise and crime current festivals bring is too much already. The proposed events will be horrific for residents that live around the park.
Live nation must not be allowed to organise any such festival in our area.

Thank you

Double, Paul

From: Licensing
Subject: FW: Application Ref : 20/00398/LAPRE (The "Application ") made by Melvin Benn on behalf of Live Nation (UK) Limited (the"Applicant ")

Subject: Application Ref : 20/00398/LAPRE (The "Application ") made by Melvin Benn on behalf of Live Nation (UK) Limited (the"Applicant ")

Dear Sir/ Madam

This evening we have tried to register our objections to the aforementioned application on your system but all we have had is a reply to say that there is a system error and the comments have not been accepted.

I have therefore pasted our comments below.

Tomorrow (Monday 5th) is the last day for comments and we are concerned that our objection will not be received in time because of your technical failure.

I would be grateful if you could confirm that these comments have now been received by you.

Our comments are as follows :

Application Ref : 20/00398/LAPRE (The "Application ") made by Melvin Benn on behalf of Live Nation (UK) Limited (the"Applicant ")

We understand that the objective of the Crystal Palace Trust is to permit a festival run by a commercial organisation in return for a payment which will allow the trust to invest in the maintenance of the Park itself.

However, whilst the aim of the Trust may be a laudable attempt to make good the decades of neglect by the local authority, the scale of the events being proposed are far too great for such an urban setting. It is just not possible for any organiser to hold an event with 300,000 attendees over the 6 days spread over 2 consecutive weekends to prevent a significant nuisance and disorder to the residents of the surrounding area which the sale of alcohol will serve significantly to exacerbate.

The supporting documents refers to discussions with various departments of the LBB (London Borough of Bromley). This in itself fails to reflect the complexity of the geography of the area. Whilst Bromley may be the borough within which the park itself sits, it is but one of 5 boroughs which meet at Crystal Palace, namely Croydon, Lambeth, Lewisham and Southwark. Any plans agreed with Bromley will not protect nuisance and criminality in the other boroughs. In fact, they are more likely to ignore the problems caused to residents of the surrounding roads.

Given the difficulties documented at the Finsbury Park festival it is naïve to imagine that the attendees will only use Crystal Palace station, especially at the end of the evening. Many will use alternative stations such as Gipsy Hill, Sydenham or Sydenham Hill which are all based in 3 separate boroughs.

We have grave concerns about the safety of the public at the other stations which will not benefit from the stewarding that will be in place in Crystal Palace station. We consider that it is likely that there will be acts of public nuisance (eg urinating at the side of the road/ into gardens which boarder the roads in stations etc) and possibly worse, drug dealing , theft, fights between drunken festival attendees which will present a threat to local residents.

The doors will be open for 13 hours a day and music playing for 11 1/2 hours/day. If the music is to be heard by the festival attendees, the open nature of the terraces within the park means that the music will be clearly heard by the residents of the surrounding area. This constitutes a major nuisance to the local population and the disruption of their right of quiet enjoyment.

One can only imagine that local residents will become prisoners in their own homes for those 6 days.

Furthermore, the public, many of who don't have access to a private garden will lose access to significant sections of the of the park for almost a month as areas will be boarded off not only for the duration of the concerts but the weeks leading up to and after the event. That, in itself, is an unacceptable nuisance.

Finally, it is impossible to understand how any such festival can be held with any realistic possibility of protecting the public from coronavirus. This again will be exacerbated by the sale of alcohol

Those attending the festival may be totally symptom free but there can be no social distancing at the festival, and as the day wears on, many of the festival attendees will become inebriated and any measures at preventing the spread of Covid 19 will be totally forgotten. This presents an unacceptable risk to the health and well-being of local residents. By the summer of 2021 there may be some measures which mitigate against the pandemic but any thought that the pandemic will be under control and the virus only a dim and distant memory, sadly delusional.

This will be, without any shadow of a doubt, a superspreading event to the detriment of those attending, those working at the event and the local populations of all the surrounding areas, and not merely the residents of the borough of Bromley.

Therefore, we consider that the licence application should be refused.

If you, as the LBB do not refuse the licence, we maintain that there is a major duty of care upon you to ensure that the licence granted places stringent limitations on the applicant. With the festival taking place on two consecutive weekends it will simply not be feasible to change any conditions between the two events. The following limitations should, at least be imposed:

1. To safeguard the wellbeing and safety of the local population and other users of the other local train and bus stations, stewarding and marshalling needs to be provided to all the local stations and not just to and from Crystal Palace station.
2. The event needs to end much sooner. We would suggest that the licence would bring the events to and end by 9 or 9.30 with a view to the site being clear of festival attendees by 10pm (in accordance with the current

Covid rules). Should the Covid rules be relaxed over the coming months the applicant could resubmit their application.

3. LBB must demonstrate that it has consulted widely with its surrounding Boroughs and there is an agreed strategy to protect the local population from criminality and nuisance.

Double, Paul

From: Licensing
Subject: FW: Objections to Live Nation festival

Sent: 04 October 2020 22:04
To: Licensing <licensing@bromley.gov.uk>
Subject: Objections to Live Nation festival

To whom it may concern,

It has come to my attention that live nation has applied for a licence to hold an event with 50,000 people in Crystal Palace park.

Crystal Palace is a family area and the park is used throughout the weekend by families as are the surrounding areas, high streets and shops.

It is of great concern that the council is allowing such an event of such a magnitude to take place in a highly dense residential area. I am well aware that there are many events by live nation which have attracted violence and will therefore place the residents and local businesses at risk.

The local transportation cannot cater for this amount of people and the trouble caused by parking and traffic disruption will be immense.

The council should not be granting licences to events of such a size in residential areas as these sorts of events are not of benefit to the local and surrounding communities and only bring disruption, violence and risks to families and local businesses.

Double, Paul

From: Licensing
Subject: FW: Crystal Palace Park Wireless/Live Nation

Sent: 05 October 2020 11:15
To: Licensing <licensing@bromley.gov.uk>
Subject: Crystal Palace Park Wireless/Live Nation

Hi

I'm writing to object to Wireless / Live Nation events in Crystal Palace Park.

These festivals attract large anti-social crowds and I believe these events would destroy the park and local area for the residents who value it so much. There's such a small community in Crystal Palace and people love and value the park and triangle. It needs to be preserved and cared for and these events would ruin all the hard work people have put into looking after and restoring treasures of the area.

The park is steeped in irreplaceable history and damage to the area would be devastating and irreversible.

Please please please do not do this to our park and community.

Thanks,

Double, Paul

From: Licensing
Subject: FW:

Sent: 05 October 2020 12:16
To: Licensing <licensing@bromley.gov.uk>
Subject:

Dear Licensing Team,

I am writing to object to the licence application by Live Nation Ltd. The application doesn't give much information about the events will be and 50,000 people is a lot of people to have on the park. The music events which have already been taking place are much smaller and have caused problems in the area with noise and anti-social behaviour in the local pubs. It will cause public nuisance and be dangerous for children who use the park every day.

Yours faithfully

Application Ref : 20/00398/LAPRE (The “Application “) made by Melvin Benn on behalf of Live Nation (UK) Limited (the”Applicant ”)

At the meeting of the Dulwich Society Executive Committee on September 14th 2020, having considered the Application, it was resolved to make a representation against the grant of the Application.

1. Section 5 of the Application : States that the Crystal Palace Park has a history of staging music events . It fails, however , to mention that the majority were one-day events for a capacity crowd of 15,000. This Application is for two three-day events over consecutive weekends with a daily capacity of 50,000 , more than the aggregate population of the 3 wards nearest to the site (Crystal Palace Ward (Bromley) , Sydenham Ward (Lewisham) and Dulwich Wood Ward (Southwark)). The daily capacity crowd is simply too big and such an influx of people will result in major disruption to residents and businesses throughout the area. The Application fails to demonstrate how the Applicant will prevent this nuisance.

The Application fails to understand or address the complexity of the locality of the site. Whilst the site is located in Bromley , the effects of the event will extend to the other 4 adjacent boroughs , who do not appear to have been consulted or to have any say in the conditions subject to which a licence may be granted.

No indication is given of the type of events planned.

2. Section 18 of the Application: Licensing Objectives

- a) The Licensing Authority is being asked to grant a licence without detailed information as to how the 4 licensing objectives will be met, but merely to rely on the word of the Applicant that they are an experienced promoter of large out-door events who know how to run them ! The Application gives a list of matters to be included in an Event Management Plan to be submitted 3 months before the first event, nothing more. There is reference to an Alcohol Management Plan, but , worryingly, no reference to,or mention of, a Drugs Management Policy, far less a properly detailed Plan. The Multi-Agency Forum to which The Event Management Plan is to be submitted (3 months before the first event) , seems to omit representatives from the neighboring Boroughs of Lewisham, Southwark, Croydon and Lambeth, which is totally unsatisfactory.
- b) Prevention of Crime and Disorder : The Application attempts to deal with prevention of crime and disorder on site; but it has no concern with dealing with such problems off-site which will inevitably be caused by the sheer weight of numbers of festival goers. It is suspiciously silent about whether any, or an adequate number of the already stretched Police service will be on site throughout the event ; the Application only states that Police will be notified ‘*at the earliest opportunity in case of any incidents of serious crime and disorder*’. Unless on-site, attendance means a delay, typically 20 minutes from general experience, and worse still, competing with the other weekend incidents - rather than having a specifically seconded and paid- for group of police available on the spot ; this can hardly inspire confidence in the Licensing Authority that the licensing objective of prevention of crime and disorder will be satisfied.

No approximate numbers or manning details are disclosed of stewards or security personnel and their hours of deployment ; as the Applicant has run open-air events of a similar size before, surely they must be able to give the Licensing Authority a rough idea of the number of numbers engaged at similar events, rather than leaving the Licensing Authority starved of relevant information at the time of deciding whether or not to grant the Application.

CCTV is said to be installed at agreed locations across the site to give coverage of key locations on site. Why not off-site too – to deter trouble/nuisance/ drug dealing outside the site, and on routes to and from nearby stations?

c) Public Safety:

Licensing guidelines give pretty clear detail of what is expected of an applicant with regards to ensuring public safety, but this Application only deals in general terms with what will be included in the Event Management Plan. Under the Sub-Heading ‘Responsibility for Public Safety/Health and Safety’, it is stated that “*the security of the licensed site and safety of persons within it under the Licensing Act 2003 will be the responsibility of the Premises Licence Holder during the period of licenseable activities on the site each year*”. What does that tell anyone? It means that there is a deliberate omission of how the Applicant intends to fulfil the obligation to ensure the safety of ticket holders entering or leaving the site and of the safety of local residents.

The event organisers are proposing to send up to 50,000 people through busy stations and along the busy roads adjoining the Park, or through adjoining residential streets, massively increasing the risk of a road traffic /pedestrian accident. Should an accident or crush occur, the Licensing Authority can hardly argue such a risk was not foreseeable.

The Application provides no calculations for the duration of exit times from the Park in the event of an emergency, or even details of which gates will be used for egress at the end of each day’s event. At a rough estimate 49,999 people, moving at average walking speed (not drunk or socialising) would take well over 2 hours to exit safely through one gate. In contrast, the Applicant states optimistically in section d) headed “Prevention of Public Nuisance” “*As dispersal is scheduled to finish by 23.00, egress will be contained to this time period.*”. When will dispersal start? Will everyone have dispersed by 23.00? Is it planned to check the Park and lock the gates at, say 23.30?

Covid: Any licence granted must be subject to any regulations or guidance from time to time in force issued by HM Government or Bromley Council in respect of prevention or spread of the Covid-19 virus – and any recommendation must be regarded as mandatory, not optional. Failure of the Applicant to enforce observance by those present on site of any such regulation or recommendation must be regarded as a fundamental breach of the licence, which revokes it automatically.

d) Prevention of Public Nuisance :

The Application is for a capacity of 49,999 for each of the 6 days. So, for each of the 6 days the local population is invaded by overwhelming numbers, virtually the size of the local population itself. What is ‘Public nuisance’? It need not be actual criminal acts - it could simply be the unending loud music noise at very penetrating frequencies; it could be the flashing lights; it could be the shouting of the drunken revelers leaving the festival, or the revving up of cars choking the streets after they have initially caused parking mayhem.

Noise : The Application states that the Noise Management Plan will not permit the exceeding of the maximum noise levels permitted (but not stated); Bands will play for over 10 hours each day. This does not cover the amount of noise generated by the audience, parking, car-doors etc. 130 decibels on the site is not the same as 90 decibels generated by each car door being slammed well past midnight in your street. No reference is made to where and how many noise monitoring stations will be located and how residents get access to their records. If the licence is granted, it must be subject to a

condition that noise monitoring stations are located , not just in streets in the Borough of Bromley, but in the streets on the very doorstep of the site , in the Boroughs of Lewisham, Southwark , Lambeth and Croydon.

Litter : Large festivals generate a large amount of rubbish, within and outside the site. However, the Application fails to specify how litter bins are to be placed on the site and how it will be patrolled for litter collection during the course of the event , and finally , the arrangements for off-site removal. Additionally, it ignores what further measures will be taken for collection of the rubbish which will inevitably be dumped along the routes to nearby transport facilities .

Loss of amenity : The arrival of some 50,000 people each day will cause the inevitable choking of public transport points and the surrounding streets, crossings and undoubtedly, shops . It will be no place for the locals! The remainder of the Park itself is likely to be regarded as off limits during the commotion of the festival itself . Fencing off the Terraces, which form a large part of the Park, for almost a month in the height of summer (including set up and take down) will result in a loss of amenity for regular Park users, many of whom do not have the luxury of a garden.

Public urination and defecation: Apart from pubs and a handful of restaurants , which are of course open for limited hours and only for patrons, there are there no toilet facilities in the vicinity of the festival site. Whilst provision of portaloos on-site addresses the bulk of the problem, but the problem is always at its most pressing after people leave the site! Press reports abound of the distress caused to residents living in Harringay near the Wireless Festival site (a festival run by the Applicant) because of their gardens being used as toilets ; No doubt bushes near and in the Park will be used for a similar purpose.! If the licence is to be granted , it should be subject to the condition that portaloos are installed at public transport locations in an attempt to mitigate one inevitable, unpleasant, consequence of this event .

- e) Protection of children from harm: The Application makes a sweeping statement that these events will not attract many children, that there will be no planned and separate childrens' areas but falls short of confirming that children under the age of , say 5 or 10 , will not be permitted entry.

To summarise, the Society maintains that the Applicant has failed to address fully the 4 licencing objectives and urges the Licensing Authority to reject the Application . If however it is minded to grant the Application, conditions imposed on the licence should include the following :

1. The maximum capacity should be limited to 35,000, to include ticket holders , guests , artists , staff and contractors.
2. The two three-day events should not be held on successive weekends: in the event of a major incident or disturbance during the first three-day event there would not be sufficient time for a licence review to consider whether the event the following weekend should take place.
3. Licensed entertainment should cease at 22.00 on Fridays and Saturdays and 21.00 on Sundays.
4. Sale of alcohol should cease one hour before licensed entertainment ceases.
5. CCTV to be installed outside the perimeter of the festival site.
6. Stewards should line all routes from the site to nearby train stations and bus garage.
7. Security should conduct regular patrols of the Park after the site is closed to deter festival goers from camping/sleeping in the Park overnight.
8. Applicant must arrange, at its cost, daily refuse collection in streets adjoining the site/ between the site and train stations.

9. Location of noise monitoring stations to be agreed by Bromley with the noise teams of adjoining Boroughs.
10. No children under the age of 10 permitted entry. Children under the age of 16 must be accompanied by an adult.

October 3rd 2020

Double, Paul

From: Licensing
Subject: FW: Objecting to Live Nation (music) uk Ltd

Sent: 05 October 2020 13:49
To: Licensing <licensing@bromley.gov.uk>
Subject: Objecting to Live Nation (music) uk Ltd

Dear Bromley Licensing department,

I would like to object to the license by Live nation (Music) Uk Ltd application to hold 6 festivals at Crystal palace park under Public Nuisance

- Based on previous shows by the same organiser (Wireless, Lovebox) there is evidence of anti social behaviour taking place on the entrance and exit.

Kind Regards

Double, Paul

From: Licensing
Subject: FW: Appeal against live nation in Crystal Palace park

Sent: 05 October 2020 15:38
To: Licensing <licensing@bromley.gov.uk>
Subject: Appeal against live nation in Crystal Palace park

Dear Sir/Madam

I am writing to you in order to appeal against the application for Live Nation to use crystal palace park for multiple 40,000 capacity festivals, including wireless festival.

As a resident of thicket road, adjacent to the park, I and my family including a new baby have several concerns regarding safety and disturbance of the residential areas around the park.

These festivals are known to attract serious trouble in regards to violent crime and drugs and general antisocial behaviour and as a new father, fear for the safety implications of our home. We will not accept these festivals to take place as we know of the reputation that they have in previous locations and do not agree that crystal palace park is a suitable location.

The area and the park itself is regularly used by families with young children and we believe that the festivals would cause extensive damage to the grounds and the total weeks and months of preparation for these festivals would not only result in heavily increased traffic of HGV's down the already congested and hazardous Thicket road, causing pollution and noise. As a father, These times would render the park unusable for so many who depend on it for their daily wellbeing. I am concerned about the noise levels during the festivals and the negative effects this can have on the young families in the area.

My main concern however is the safety risk to people and property in the surrounding areas, due to the high risk of serious violent and drug crime and antisocial behaviour. Our ground floor property has a front garden on the roadside and we are concerned that the property will be used as a toilet and rubbish dump. We fear that we would have to vacate the area during festivals for peace of mind and safety but this leaves our home vulnerable to reputedly bad crowds.

I don't believe that there will be adequate Police or Security to protect such a residential area with such a bad crowd, and such I vehemently request that this application is turned down for the safety and concern of the local community.

Thank you for considering our thoughts and we sincerely hope this application is not carried forward.

Thank you

Double, Paul

From: Licensing
Subject: FW: Object to Live Nation

Sent: 05 October 2020 15:43
To: Licensing <licensing@bromley.gov.uk>
Subject: Object to Live Nation

Hi,

I would like to object to live nation ltd coming to crystal palace.

I am in the music business and the last thing we want on our door steps is live nation/ festival republic.

This space should be for independent promoters not corporate companies like live nation, there will be no consideration for anything, people, wildlife and environment.

There is no mention of the event names which means they will book artists who bring a horrible clientele. Please say NO

Regards

Double, Paul

From: Licensing
Subject: FW: Festival

Sent: 05 October 2020 23:53
To: Licensing <licensing@bromley.gov.uk>
Subject: Festival

I am writing to objective to the planned festival based on public safety with the number of people attending the event and the history at wireless

Regards

Double, Paul

From: Licensing
Subject: FW: Comments for Licensing Application 20/00398/LAPRE

From: ESD Planning (Group) <planning@bromley.gov.uk>
Sent: 05 October 2020 23:57
To: Licensing <licensing@bromley.gov.uk>
Subject: Comments for Licensing Application 20/00398/LAPRE

Licensing Application comments have been made. A summary of the comments is provided below.

Comments were submitted at 11:56 PM on 05 Oct 2020 from.

Application Summary

Address: Crystal Palace Park Thicket Road Penge London SE20 8DT
Proposal: Premises Licence
Case Officer: No case officer assigned
[Click for further information](#)

Customer Details

Name:
Email:
Address:

Comments Details

Commenter Type: Local Resident
Stance: Customer objects to the Licensing Application

Reasons for comment:

Comments: 11:56 PM on 05 Oct 2020 As a resident of the London Borough of Southwark living within a few hundred metres of Crystal Palace Park, I strongly object to the granting of a licence to hold music and entertainment festivals in the Park on such a huge scale.

Whilst I accept that the Park is in need of reliable and ongoing sources of funding to sustain it, this must not be to the detriment of the local population's right to enjoy a peaceful and, apart from the incessant traffic noise, quiet neighbourhood around the park and nearby. Such numbers converging on what is already a bottleneck in this part of London would bring the traffic to a standstill for the duration. Parking overspill would result in side streets being overrun and cars occupying or blocking private driveways and other parking areas reserved for

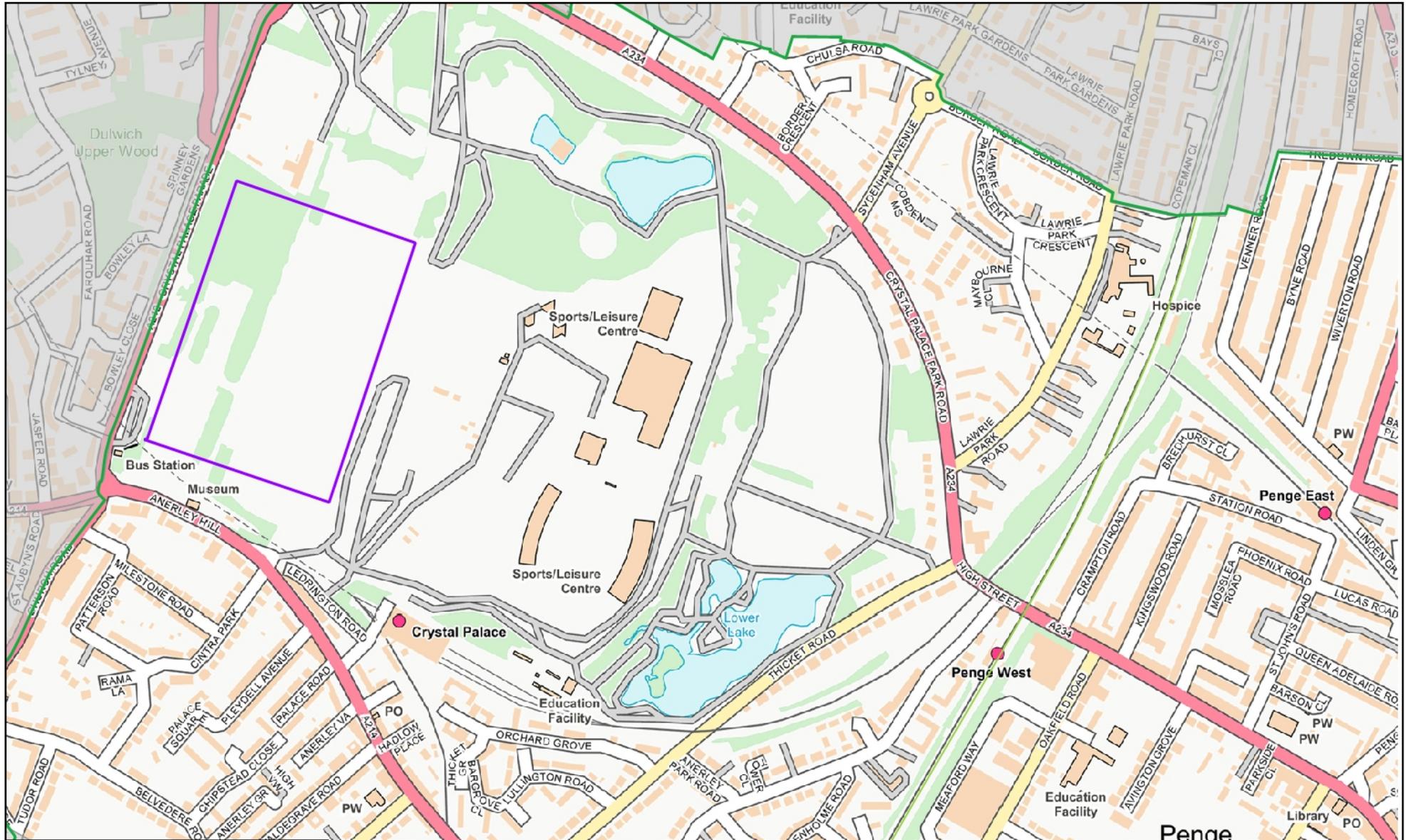
residents. As a disabled person who depends on a car to get around, this would be more than an inconvenience. Late night activity after events is likely to be noisy and disruptive with such numbers (far greater than an average premier league football crowd) roaming the streets.

Having had a taste of what the experience would offer when, last year, something similar took place in the Park, I have no wish to have to listen again to ear-splitting sounds so invasive that I couldn't hear my radio over the din, even with the windows closed.

Please consider scaling down these numbers and also moving the action away from the top of the park to an area where the sound doesn't carry so far.

Appendix 3

Map of the Park Area



Public Protection

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Ordnance Survey 100017661.



Licensable Area



13 October 2020 | 1:7500

