

Supplementary comments to accompany Westcombe Society Response to
Circus Field Licence Application

The Westcombe Society have read and noted the following:

Blackheath Circus Field Premises Licence Application

Letter dated 23 December from Cllr. Denise Scott McDonald to the Westcombe Society

Notes circulated after a meeting between Cllr. Denise Scott McDonald, Cllr. Cherry Parker, Cllr. Geoffrey Brighty, Bob Hills, Katrina Delaney, Bob Hills including additional comments from Bob Hills and Cllr. Brighty.

Janine Whitaker responses to residents' emails dated 27th November to 3rd December

Responses from RBG Noise team

Hire agreement for the Circus Field

Janine Whitakers notes to the chair of BJWP

Pre Approval questionnaire and supporting documents for In the Night Garden Live

We thank all those concerned for the assurances given and welcome the statement 'it is highly unlikely that this maximum limit of operating days will be reached'. This clearly indicates that it is not currently the Royal Borough of Greenwich's intention to use the Circus Field to the extent that the proposed Licence would allow. However the licence is a legal document, the assurances we have been given are not. Even if we accepted the assurances given for 2016, we do not believe that these assurances can protect residents from the possibility of a very large increase in use of the Circus Field for Events into the future. As it is the proposal we have just been given for 'In the Night Garden Live' is in itself a significant increase in use for any part of the heath. As far as we know no other event apart from the Olympics has been on any part of the heath for this length of time. We will comment separately in more detail on this when we have given it due consideration and discussed it with the BJWP and the other amenity societies.

The licence currently under discussion is unspecific as to type of event, time of year, setup and breakdown days, enclosure of the heath to name but a few points where it is vague, all of which would influence how an Event affects local residents. Once granted this licence would give no protection from the possibility of a future administration of the Royal Borough of Greenwich using it to accept Events to the maximum number of days allowed by the licence. We are also told that 'discretion will always be used when accepting event bookings' but who is to say how current and future Event teams will interpret this?

In our view the only way to protect Blackheath and local residents is if there is an Event Policy agreed by both Greenwich and Lewisham Councils and the BJWP, with input from residents both through formal consultation and through their representatives on the BJWP. Until this is in place licences should be sought on an Event by Event basis.

To be more specific we would like to expand on the following:

No of days the Circus Field would be in use either for an actual Event or for setup or breakdown

Janine Whitaker states in her responses to emails that the current use of the Circus Field is a maximum of 3 Funfairs, 1 Circus and the Marathon. In the last 3 years there has only been 1 circus. We don't have a record of the exact length of all events but have made assumptions for comparison. These assumptions may underestimate or over estimate for some events. Hopefully they are sufficiently accurate to show how the potential extra usage that might arise, if the RBG licence is granted, compares to current usage and how this could change the nature of Blackheath.

Assuming 7 days onsite for a Funfair, 15 days for a Circus (so 5 days a year for the last 3 years) and a minimum of 3 days for the Marathon plus 1 day out of use for the Fireworks, then an estimate of current use of the Circus Field is as shown in Table 1. An estimate of other use of Blackheath is shown in Table 2 and the total estimated current usage of Blackheath for Events in Table 3. Most of these Events fall in the 6 months from the end of March to the end of September.

Table 1 Estimate of Current Use of Circus Field for Events

Circus Field Current Usage for Events (Estimate)	Estimated average Event Days per year	Estimated setup/breakdown days	Estimated total days on site per year
Funfairs (3)	15	6	21
Circus (1 in 3 years)	4	1	5
Marathon	1	2	3
Fireworks		1	1
TOTAL	20	10	30
WEEKENDS affected			5/6

Table 2 Estimate of Current use of Blackheath for Events excluding Circus Field

Blackheath Events excluding those that use Circus Field (estimate)	Estimated Event Days per year	Estimated setup/breakdown days	Estimated total days on site per year
Funfairs (2)	10	4	14
Circus	12	3	15
Fireworks	1		1
OnBlackheath	2	10	12
Race for Life	1	1	2
Other e.g. Food Festival	2	2	4
TOTAL	28	20	48
WEEKENDS affected			7

Table 3 Estimate of Current use of Blackheath as an Event site (Table 1 and 2 combined).

Blackheath current usage for Events (estimate)	Estimated Event Days per year	Estimated setup/breakdown days per year	Estimated total days on site per year
Funfairs (5)	25	10	35
Circuses (1 per year plus 1 per 3 years)	16	4	20
Marathon	1	2	3
Fireworks	1	1	2
Race for Life	1	1	2
OnBlackheath	2	10	12
Other e.g. Food Festival	2	2	4
TOTAL	48	30	78
WEEKENDS affected			12/13

The proposed licence is for a possible 60 additional Event Days with an unspecified set up and breakdown. We are promised that setup and breakdown will be kept to a minimum but there is no guarantee of this. The 'In the Night Garden Live' Event proposes 21 non Event Days. Hopefully not all Events will need so many non Event days so we have used OnBlackheath as the average (10 setup/breakdown days). Therefore we have estimated an additional 50 setup/breakdown days as the possible scenario if 5 events are booked. This possible scenario is shown in table 4. We have estimated potentially two weekends per smaller event of 5 days (as we assume events will take place at a weekend and setup/breakdown for a five day event will spill into a second weekend). We estimate 5 weekends for the longer event as this is what is proposed for 'In the Night Garden Live'

Table 4 Estimate of potential ADDITIONAL use of Circus Field as an Event site if the Licence is granted

Potential Additional Use of Circus Field	Event Days per Year	Estimated setup/breakdown days per year	Total days on site per year
5 Events	60	50	110
Potential WEEKENDS AFFECTED			15

Table 5 overleaf summarises the information in Tables 1, 2, 3 and 4. It is meant to indicate a 'worst case' scenario if the full number of Events the Licence would allow occur. Even then it is impossible to accurately estimate the effect because the licence puts no limit on the number of setup/breakdown days. The biggest issue with the proposed licence is that there is no protection for residents from the possibility of the Licence being used to its full extent in perpetuity.

Table 5 summary of Event Days***

	Circus Field current use	Other Blackheath current use	Total Blackheath current use	Potential Additional use of Circus Field if Licence granted	Potential total use of Circus Field if licence granted	Potential total use of Blackheath if licence granted*
Event Days per year	20	28	48	60	80	108
Days on site per year	30	48	78	110	140	188
Weekends affected	5/6	7	12/13	15	20/21	27/28
Event Days % of year	5%	8%	13%	16%	22%	29%
Days on Site % of year	8%	13%	21%	30%	38%	52%
Weekends % of year	11%	13%	24%	29%	39%	53%
Spring/summer weekends if all events in spring summer % **	22%	26%	48%	58%	78%	100%
Days on site as % of spring/summer months**	16%	26%	48%	60%	76%	100%

* Potential total use of heath does not include any additional events Lewisham may choose to run in the light of increase in events on the Greenwich side.

** these figures are given because most of the Events occur in the 6 months from end March to end September. Very few, if any, events that affect weekends are held outside this period.

***The figures assume no events overlap. This is normally the case for events taking place on Blackheath

As can be seen from Table 5, the proposed licence has the potential to change the Circus Field from an open green space with occasional events to an event space that is only very occasionally open green space, especially in the spring/summer months. When combined with Events on other parts of the heath there is the potential for a situation where residents would have no respite from events throughout the spring and summer.

Length of Events

We are also concerned that the clause allowing for events with up to 20 event days is a significant departure from the normal length of events on Blackheath. We are told this is to accommodate events such as 'In the Night Garden Live' which RBG wish to book this year. However suitable the event with regard to target audience and noise levels, we question whether events of this duration should be considered. The proposal is for 36 days inclusive on site (including 15 days with performances which start at 10am and finish at 5pm) i.e. more than a month including 5 weekends with the car park in regular use (for multiple performances) most days. We feel that this is too long on what is supposed to be common land.

Noise

It has been suggested that spreading events out around the heath means different residents are affected by different events. Unfortunately this is not always the case. Changing wind direction and the topography of Blackheath and its surrounding residential areas means that noise anywhere on the heath can affect residents on all sides of the heath. Although the prevailing wind direction means that Westcombe Park is most likely to be affected, it is impossible to predict the wind direction and strength when planning Events. It needs to be assumed that any Event on any part of the heath has the potential to affect residents in any direction. This year some residents in Westcombe Park couldn't hear the music on their televisions properly while OnBlackheath was on despite closed windows and OnBlackheath being on the opposite side of the heath. We are also affected by the Race for Life. Circuses and Funfairs affect us less in our homes and gardens now than they used to before the allowed noise levels were lowered but they do affect our use of Greenwich Park and can sometimes be heard in our gardens. All of the above means that the Circus Field, or any other part of the heath, should not be treated in isolation from the rest of Blackheath when it comes to assessing the affect on residents of noise. We therefore reiterate our long held view that Blackheath needs to be regarded as one site when considering the CIEH limits.

Use of the Open Space

As part of this consultation we have been told that during events walking routes around the perimeter of the Circus Field on the grass will be kept open. This has been a welcome improvement, made recently, for current events and is appreciated. However walking round the perimeter still means a significant diversion from the direct route from the War Memorial to the crossing at the junction with Shooters Hill Road. It also means walking closer to the roads so more exposure to fumes and noise. Fencing is also unsightly as are many event structures. As we have said the current number of days walking routes are affected is regrettable but acceptable, the more days affected the less acceptable it becomes. The same goes for other recreational use of the Circus Field open space.

Wear and Tear

As part of this consultation we have been told that the Circus Field was reinstated after the Olympics with the specific idea of preparing it for use by Events. We are aware that LOCOG significantly improved the state of the Circus Field from the state it was in at the start of 2012 but we were not told this was to ready it for an increase in the number of events. As far as we were concerned we had understood that it was being repaired after years of use by Circuses and Funfairs and would better be able to cope with similar use in the future. We were not told that the intention was for the Circus Field to be able to withstand greater use than in the past. With the potential level of use that this licence could allow, we wonder if the Circus Field would ever recover, even if it is in a good state now.

Parking

Many feel that parking on the heath should not be allowed. Parking is not provided for most Events including on Blackheath. We feel the same policy should be adopted for events on Circus Field. We are told that there have been no complaints about parking for current events. However, this does not mean that parking won't become an issue if the number of events increases. Cars parked on the heath are unsightly and also cause more damage than necessary. Car parks on the Circus Field make crossing it more difficult during event periods and also causes nuisance on neighbouring roads when events finish due to the number of cars leaving all at the same time. If the number of events increases this may well become an issue. If parking is not allowed then parking may become an issue in local streets. However most of these are protected by parking restrictions. For residents on streets without controls it seems that, if the number of Event days increases as significantly as proposed, even for 2016, this may be a no win situation. The proposals for 'In the Night Garden Live' also raise the question of how many performances a day should be allowed as this may significantly affect the amount of movement of vehicles in any one day. For this event in particular, although on the face of it the target audience of families with young children may make the event seem more suitable for the heath. However this type of audience may well be more likely to travel by car.

Greenwich Park

We have already mentioned noise nuisance from events on the heath affecting enjoyment of Greenwich Park. Not only does this affect quiet enjoyment of the Bandstand area, Flower Garden and Cricket pitch area, it also affects the deer. Some residents are very concerned that an increase in use of the Circus Field for events might mean that the deer suffer and at worst might have to leave the park. Clearly this is an issue the Royal Parks may want to comment on. We are commenting because any threat to the deer is of relevance to our residents as they are a very important and popular attraction in the Park and it will be very sad if they suffer (or at worst leave) due to an increase in the use of the heath for commercial Events.

Setting a Precedent

Last but not least we fear that this is the thin end of the wedge. Traditionally the heath has been used for Circuses and Funfairs and Fireworks that cater for local people and for charitable events such as the Marathon and Race for Life. We fear that it is now becoming a site for commercial events which cater for a much wider area. We also fear that if Greenwich grant this licence, and if the Circus Field is then used for more and more events, Lewisham will be sorely tempted to follow suit and increase the number of Events on their side of the heath. We feel that granting this licence will set a dangerous precedent that may well change Blackheath for ever. We therefore urge the Royal Borough of Greenwich to work with the Borough of Lewisham, the BJWP and local residents to put together an agreed Events policy for the whole heath BEFORE any licence like this is granted.