



# THE WESTCOMBE SOCIETY

serving the Westcombe Park community

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## **Circus Field Licence Application WK/201521902**

Following consultation with members and representations from residents, the Westcombe Society objects to the current Circus Field licence application. Our grounds for objection are listed below.

We have taken note of the communications we have received, both direct and indirect, containing responses to residents' concerns and other information from Denise Scott McDonald, Bob Hills, Janine Whitaker and others at Royal Borough of Greenwich. Comments in response to these are made in the supplementary pages at the end of this letter.

## **Grounds for objection to the Circus Field Licence Application WK/201522549**

### 1. Public Nuisance

#### 1.1. Obstruction of the right to roam over the Circus Field as part of the common of Blackheath

The presence of Funfairs, Circuses and the London Marathon on the Circus Field cause an obstruction at present both from the events themselves and associated car parking. The limited number of days involved means that the effect is acceptable, if regrettable. The situation has also improved now that the amount of temporary fencing enclosing event sites has been reduced, although ideally we would like all such fencing banned from the site. Regardless of the assurances given by Cllr. Scott McDonald, Bob Hills, Janine Whitaker and others, this licence could result in five additional events (involving up to 60 event days plus associated set up and break down days). This increase in use has the potential (as the total number of days involved in site set-up and breakdown are neither specified nor limited) for partial or complete denial of public access to the Circus Field to become the norm, rather than the exception. Assuming up to 10 days for each event for set-up and breakdown (based on OnBlackheath) plus the maximum number of additional event days that could result from this licence this would allow a potential 110 days in total (including setup and breakdown) on top of the average use in the last three years by Funfairs, Circuses and the Marathon (approx 56 days). Therefore if this licence is granted there is a potential for disruption to the right to roam for approximately 166 days in the year most of which would be in the six spring/summer months. This potential level of obstruction of the right to roam is unacceptable. If this level of use is not the intention then this licence application should be withdrawn and replaced with one that more accurately reflects what is intended.

### 1.2. Noise

The residents of the Westcombe Park area are already subject to a significant amount of noise nuisance from the existing events on Circus Field and on other parts of the heath. Given that the number of event days already exceeds 12 and that other events may also include live or recorded music the noise limit should be set such that the noise level shall be inaudible inside the nearest noise sensitive premises. The existing condition for funfairs i.e. 60dB at 1m from the facade of the nearest noise sensitive premises should also apply. Any new license condition should not exceed this. Any new license should also contain the condition "There is to be no "barking" or unnecessary microphone announcements permitted" as for the funfairs.

Noise is also an issue for those who use Greenwich Park where many local people and others walk on a regular basis. Existing events on the heath, particularly on the Circus Field, prevent quiet enjoyment of the park due to the level of noise heard within the park and some feel compelled to avoid the park on event days. Any increase in the number of events on Circus Field reduces the number of days the Park can be used for quiet enjoyment.

Noise is a particular issue as the Events likely are leisure events scheduled mainly for evenings and weekends and mostly in the summer months i.e. at times when many local people prefer peace and quiet to enjoy their leisure time.

### 1.3. Pollution

Any event which attracts a large number of people, many of them travelling in their own cars, increases pollution, congestion, litter and dirt. Local residents accept that a certain amount of this is inevitable in an urban environment and would not wish to inhibit other people's enjoyment of the open space. However, the level of pollution that is possible due to the possible number of additional events is unacceptable. Assurances that say that operators will discourage car use are meaningless if car parking is provided on site. Any licence needs to include clauses that prohibit car parking on site (apart from the minimum needed for the running of the event and disabled parking)

## 2. Public safety and Protection of Children from Harm

The Circus Field is regularly used by people from the Westcombe Park area to walk from the traffic lights at the corner of Greenwich Park to the pedestrian lights at the junction between the A2 and Duke Humphrey's Road, allowing them to minimise their exposure to noise and traffic fumes when walking to Blackheath or Lewisham. If pedestrians have to divert around the site or walk through a car park then they are exposed to both fumes and danger from traffic especially that crossing and entering/exiting the Circus Field. The amount of additional use of Circus Field proposed in the application will mean that the safe route across Circus Field could be disrupted more often than not especially in the summer months.

The increase of events on Circus Field will, in addition to the points raised above, inevitably lead to an increase in traffic, along the A2, Prince Charles Road and Charlton Way. The A2 is already very congested and has only three safe crossing points between Stratheden Road and Wat Tyler Road. There are two schools within a few meters of the A2. The events are likely to also lead to an increase in parking in local streets. All these factors together with the number of people, up to 5,000, expected to attend the events give rise to concerns about public safety and the protection of children.

Any large public event leads to rubbish and litter which needs to be cleared up rapidly in order to prevent accidents and contamination, as well as being unsightly. In addition the use of Circus Field for events of this kind will reduce its availability for other uses such as Keep Fit, football and simple exercise and enjoyment. All these aspects present potential safety concerns, particularly for children

### 3. Perpetuity

This licence application is all the more unacceptable because the application is for a licence in perpetuity. No licence of this type should be granted in perpetuity for the Circus Field for the reasons given above. Licences should initially be applied for on an Event by Event basis so that each event can be judged on its own merits and the total number of events limited.

### 4. Number of Events

This licence application is also unacceptable because the maximum number of events proposed is too high. As stated in paragraph 1 this licence would, in effect, change the status of the Circus Field from open space common land with occasional events to a space used for events which is occasionally open space. No licence should allow this.

### Summary

The Westcombe Society believes that the current Circus Field Licence application should be withdrawn. Separate licences should be applied for for each proposed event. The maximum number of events in any one year should be determined with reference to the total number of events on Blackheath in agreement with Lewisham Council and the BJWP, taking into account the cumulative nuisance of all events on Blackheath.

The current application allows for far greater use of Circus Field than is reasonable, considering its proximity to a Royal Park and residential properties (many houses within 250m), and that it is part of a common and a Site of Metropolitan Importance for Nature Conservation (SMINC). The total number of days (including set-up and breakdown) for events on the Circus Field (including existing events) needs an upper limit that is less than a quarter of the year. We need to keep the main usage of all parts of Blackheath as open space – it should never become a regular event site. The reasons for this are:

1. Noise from the occasional funfair can still be quite intrusive, both for those who live nearby and for users of Greenwich Park. The Deer Park and the Flower Garden, which lie just the other side of the park boundary from the Circus Field are normally places of comparative tranquillity. Perhaps the deer ought also to be considered. How tolerant will they be to an increase in the number of events on Circus Field?
2. The effect of noise nuisance to residential properties needs to be considered for the Circus Field site as a whole over a year, not as individual events. In the terms of the published guidance on noise levels from the Noise Council, this is a single venue and lower levels of permitted noise should reflect this fact. Arguably the whole of Blackheath should be considered as one site (see supplementary document).
3. The Circus Field is part of a common, over which people should be able to exercise their 'right to roam' most of the time.
4. The site forms part of the Blackheath SMINC. Although it generally lacks the specific acid grassland, it still has nature conservation value and needs to be protected from overuse.

Marilyn Little

Westcombe Society Chair