

Friends of Broomfield Park object to the application for Premises Licence Application for Broomfield Park Oktoberfest.

Preface:

- Enfield Council has been negligent in the lack of consultation on this event before giving the organisers a permit, undermining the working relationships and agreements previously established with Friends of Broomfield Park.
- Scrutiny by the Safety Advisory Group (SAG) in early March 2022 was superficial. The assurances that 'Blue Light Services' have reviewed the documentation and are satisfied that the applicant will deliver a safe event' appear not to be borne out by the minutes of that meeting.
- The documentation referred at SAG to has been kept from public scrutiny but is unlikely to have details that would properly inform members of SAG.
- The discussions between the organisers and the Council in the lead up to the SAG have been kept from public scrutiny
- The event company has not been subject to due diligence and is being run by an inexperienced company set up in 2021 and whose only similar event was in a rural setting with fewer numbers

The organisers have experience from an event on Harpenden Common, Hertfordshire. This is a very different setting to Broomfield Park. Harpenden Common is set well away from low density residential areas and is 96 hectares compared to Broomfield's 21 hectares. The event is billed at the 'London Oktoberfest' demonstrating its target audience comes from across the capital. The event organisers are profit focused and so have will have little or no interest in building communities locally. This is merely a money-making transaction with the Council.

Friends of Broomfield Park (FoBP) have recent relevant and extensive experience in organising events in the setting of the park and the local community. FoBP is a not for profit, volunteer led organisation whose fund-raising events directly benefit the park and the communities it serves. We understand the unique challenges of holding large, medium and small events in Broomfield Park. We are uniquely positioned to advise licensing committee on the event proposal.

We ask licensing committee to reject the license application outright on the following grounds:

CRIME AND DISORDER

Large events of any sort bring organisational challenges, but events that are focused on consumption of alcohol pose a particular risk.

The Oktoberfest is by its nature an alcohol-driven event. Whilst the organisers will emphasise Oompah band music, food stalls and axe-throwing, these are all side orders for the main purpose which is to drink lots of beer. With this comes a high risk of at the very least antisocial behaviour and from some attendees a high risk of crime.

The Metropolitan Police recognise that drinking alcohol by groups of people can lead to criminal behaviour and pose a risk to the wider community. Where drink is involved, the police recognise that behaviour can 'escalate into aggressive, violent or lewd behaviour, such as intimidation or verbal abuse of passers-by, fighting or urinating in public. All of which are offences.'

Drinkaware advice says "binge drinking increases the likelihood of both becoming aggressive or angry and also being on the receiving end of someone else's temper."

With this risk in mind, it is likely that within 8000 people attending the Oktoberfest that even a small percentage of those taking part pose a high risk to crime and disorder. Some of this will be in the middle of a busy Saturday in the highly populated residential and shopping area of Palmers Green and in a park with a children's playground just a few metres away from the event.

The organisers will say that they have measures in place to handle crime and disorder, but evidence from similar events elsewhere suggests that even after all processes have been scrutinised, allowing a license leads to a different reality. We think that this risk cannot be underestimated.

For example:

- Islington Council's licensing committee turned down an application for a smaller event (5000) in Caledonian park on the grounds of its risk to crime and disorder, public nuisance, and damage to the park.
- A report to Tower Hamlets licensing committee about a similar event in Canary Wharf said: "This is an event that cannot control its customers who are allowed to get drunk, resulting in fights not only at the venue but also at local train stations. It shows a lack of care for its customers when a female, who is so drunk she has to hold on to a lamppost for support, is allowed to leave the venue without assistance from any staff there. It is very fortunate that being in such a vulnerable state she was not the victim of a serious crime."
- Colchester Council cancelled the second year of an Oktoberfest event after complaints from residents saying "Due diligence surrounding the event was undertaken on application and upon positive feedback and reassurance for the event organiser. Despite planning and liaison resulting in reassurances from the event promoter regarding access, control of noise and anti-social behaviour, on reflection controls could have been better implemented.
- Glasgow City's licensing board turned down the application for a second year of an Oktoberfest after Police Scotland submitted a report detailing concerns over disorderly and aggressive festivalgoers who "pose a threat to pedestrians and a significant burden on the surrounding streets".

The licensing committee may take the view that other Council's experiences are not a reason to reject a license for a similar event. However, to proceed without evidence that the event will be well managed runs a high risk of making the same mistakes based on similar organisers' assurances at other licensing committees. This should not be allowed as a full premises license.

PUBLIC NUISANCE

The large numbers proposed – 8,000 people over one weekend with 2,000 per sitting will have a major impact on a public park set within a residential area and create a high risk of public nuisance.

Friends of Broomfield Park have experience in running events with higher numbers – for example Palmers Green Festival which attracted over 4000 people or more. The difference is that this was not an alcohol-focused event, which bring with them particular challenges to law and order.

Over the past two years we have run music events of up to 400 people. From this we have found that the difficulties we face are in direct proportion to the amount of alcohol consumed. Where an event finishes at 10.00 pm the discharge of people onto Aldermans Hill presents particular risks which we manage with professional security and traffic management staff. Nevertheless, taxi pick up, parking and people clearing the area are all very challenging.

The Oktoberfest proposes this issue magnified by a factor of five. The particular setting at the North Eastern corner of the park exaggerates the risk because of the funnelling effect of a narrow gate, pavement and road at that point, limited space for taxi pick up and existing parking used for local restaurants (whose busiest nights are at the weekend), shops and residential buildings.

Aldermans Hill is a very busy road because the adjacent 'Lakes Estate' has no 'through roads' since the area was made into a 'Low Traffic Neighbourhood'. All vehicles therefore must pass along Aldermans Hill, which is easily blocked by just one vehicle stopping. When we are dealing in our events with an audience of 400 people, the clearance time can be between 30 and 45 minutes. With up to 2000 people the problem will be much greater and will lead to gridlock in the area.

Direct noise from the event is meant to be controlled and as long as there are suitable checks and balances and a contact number to call if there are problems, this issue can be managed. However, please note that the nearest residential properties on Aldermans Hill are approximately 50m away from the entrance to the event, and those on Broomfield Avenue are about 75m away from the tent. Their garden boundaries are about 50m away from the tent.

What will be more difficult to manage is the noise made by the audience leaving the event and, like some smaller events we have run, the problem increases with the amount of alcohol consumed. This is one of the major problems faced in almost all other similar events elsewhere, such as Trent Park, but mitigated where there enough space for the audience to disperse. Broomfield Park does not have that luxury – the audience leaves directly into a busy main road bounded by residential areas.

We have direct experience and can assure the licensing panel that is bound to be an issue in the confined spaces at the exits of the Oktoberfest event, regardless of the mitigation risks that will be expressed in the event management plan. Even with professional security and

traffic management, raucous behaviour will happen and this in turn will cause a public nuisance.

Urinating in public is a criminal offence. There are no public toilets on exit routes from the park. Because of the event's focus on drinking large glasses of beer, it is highly likely that there will be urinating in the park and in local residential areas around the park.

PUBLIC SAFETY

The proposed Oktoberfest presents a risk to public safety.

Road safety

On the basis of the assumptions made by the event organisers, almost all of those attending will arrive and leave by the Aldermans Hill entrances. The nearest gate for arrival is the North Eastern corner, which takes one person at a time, which when mixed with high levels of alcohol consumption and busy roads presents a major danger to participants and the public.

Another entrance further away can handle larger volumes. Each of these spills out onto the narrow pavement on Aldermans Hill, which is a single traffic lane in each direction with parking on each side.

With the majority of people using the North Eastern section of the park where there is already a heavy flow of traffic, any further build-up of traffic and pedestrians on Aldermans Hill will pose a high risk to public safety.

High numbers of traffic management and security staff will be needed to manage this risk and the particular challenges of the context. This part of the application presents a unique danger to public safety.

The travel calculations model 400 people arriving and leaving by taxi. Assuming two people will share a taxi that will result in an additional 200 vehicles arriving at the taxi drop point in the car park of Palmers Green Station. Those departing the event by taxi will be picked up at the proposed taxi rank opposite the shops on Aldermans Hill. Neither arrangement will work: the station car park can only be accessed by vehicles from the west and there is often a queue of vehicles backing up from the traffic lights on Green Lanes. This will lead to people leaving their taxis while waiting in the traffic queue. The taxi rank for those departing the event will be totally inadequate for the scale of the event.

The 100 that will drive and park is probably an underestimate, but on this assumption more cars are added to the mix for parking beforehand and leaving afterwards.

Public transport

Palmers Green Station is served by Great Northern Railway services. At the times noted, the services run at half hour intervals. On an average commuter journey in either direction train about 200 people pass through the station. 800 people trying to use the station will present a high safety risk.

The pavement outside the station, the ticket hall, stairwells and platforms are dangerous if high volumes of intoxicated people are using them in a short time scale and with infrequent trains, which are often cancelled.

On evenings, buses run about every 10 minutes from various bus stops in Palmers Green to other areas. This supposes a free flow of traffic. The high risk of traffic congestion will reduce the potential to use buses to clear the audience numbers. In turn this will result in large congregations of people on Aldermans Hill, at Palmers Green Station and in Green Lanes looking for transport.

In the submission tubes are suggested as part of the transport mix. Each tube station is at least 20 minutes walk away. Assuming that the projected numbers are correct, intoxicated people will be spilling out across a large area and are likely to extend the reach of public nuisance.

PROTECTION OF CHILDREN FROM HARM

Mixing a large alcohol-driven event in a park which is used a lot by families and especially during school holidays presents high risks. There is no indication of how this will be managed especially on the Saturday afternoon when the daytime event finishes.

2000 people exiting the event and onto Aldermans Hill will at the very least present a hazardous mixture for parents with children. The risk raised by of police of the potential “aggressive, violent or lewd behaviour, such as intimidation or verbal abuse of passers-by, fighting or urinating in public” will place children in harm’s way.