



## Conditions for the proposed premises licence for Beckenham Place Park.

We have a number of concerns about the proposed Conditions for the premises licence for Beckenham Place Park.

1. Generally, the drafting is very imprecise.
  - a) Frequently it is not clear whether an Event or an Activity or both an Event and an Activity is to be covered by any particular condition.
  - b) Whilst an Event and an Activity are both defined the following are not defined: -
    - i. Responsible Authorities (paragraph 2)
    - ii. POP code (paragraph 41)
    - iii. ESAG (paragraph 41)
    - iv. Whether 'over 499 persons' and 'under 499 persons' refers to the total number of people attending over a period of time or the number of people attending at any one point in time – this could make a very substantial difference.
    - v. Refusal (paragraph 50)
  - c) 'Activities' should be redefined as being 'under 500 persons' (otherwise, it is not clear whether an event of exactly 499 people is an 'Event', an 'Activity' or neither).
2. Concerns regarding specific paragraphs: -
  - a. Paragraph 3: does capacity prefer to total number of visitors or visitors at any one time?
  - b. Paragraph 5: why does the consultation not include a reference to Residents' Associations and other similar groups? Does this paragraph include Activities or is it specifically only about Events?
  - c. Paragraph 7: here is an example of where it's not clear whether this should also refer to Activities. Is someone going to be in overall charge of Activities? The document does not say so at the moment.
  - d. Paragraph 8: similarly will there be an Activity Management Plan?
  - e. Paragraph 9: Are authorised officers guaranteed to be present? Does this apply to Activities and not just Events?
  - f. Paragraph 10: we are concerned that you should be considering it necessary to promote 'taking care of their hearing'. Surely, the proper concern is to make sure that the music is not loud enough to damage hearing in the first place.
  - g. Paragraph 11: include 'MC's' as well as DJs
  - h. Paragraph 14: this paragraph should also apply to any Activity involving DJ's or MC's
  - i. Paragraph 18: the provisions should also include ensuring that more than 499 do not attend an Activity, thereby turning it into an Event.

- j. Paragraph 29: again, as a further example, does this paragraph apply to both Events and Activities?
- k. Paragraph 30: again, as a further example, does this paragraph apply to both Events and Activities?
- l. Paragraph 39: again, as a further example, does this paragraph apply to both Events and Activities?
- m. Paragraph 40: we are particularly concerned that there is no reference to Activities in this paragraph. Activities could be very noisy and there would be no way to monitor them.
- n. Paragraph 41: - again, as a further example, does this paragraph apply to both Events and Activities?
- o. Paragraph 42: again, as a further example, does this paragraph apply to both Events and Activities?
- p. Paragraph 43: we are concerned that residents and LBB **must** be consulted about the Transport Management Plan
- q. Paragraph 45: merely publishing a schedule does not, in our opinion, constitute sufficient consultation. Specific advice should be provided to relevant Residents' Associations and similar bodies
- r. Paragraph 47: again, as a further example, does this paragraph apply to both Events and Activities?
- s. Paragraph 50: the incident log should also record 'refusals'

Ravensbourne Valley Preservation Society 5/8/2017

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