

Appendix 6

Submission from: Tooting Commons Management Advisory Committee

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<p><i>Clear assessment of benefits and risks</i> Events need to be assessed against a public benefit principle, whereby access to these spaces by commercial events should start from the principle of no loss of access or enjoyment. The use of public green spaces for commercial events should not be seen as a right and it needs to be recognised that using a public asset for a private commercial benefit is a privilege. There needs to be clear and demonstrable evidence of the benefits of events as well as assessment of risks.</p>	<p>All events are subject to an application process that assesses the benefits and impacts. This is an established process that is reviewed as best practice in event management develops. The Cabinet report sets out the strategic benefits of events.</p>
<p><i>Greater transparency about income generated and using it for the benefit of green spaces</i> One difficulty is how to judge the economics of holding events. There is an argument that income from large-scale events may help support smaller, more community focussed events, but this needs further evidence. Surplus revenue from events should be spent on green spaces and dedicated amenities through a Park Investment Levy. (E.g. for Clapham Common, 21% of the total hire fees for each event are allocated for reinvestment in the Common.) In this context, we draw attention to the statement by Haringey Council that the Council spends all income generated from events held in Finsbury Park on Finsbury Park, which the Council states is in line with the Open Spaces Act 1906. The cost of any significant damage arising from events needs to be factored into an environmental impact fee to be charged to organisers of events if required.</p>	<p>Income generated from events in parks, commons, and open spaces contributes to the annual concession fee of £3.7m payable by Enable to the council. The concession fee is derived from income generated across the Enable portfolio and includes other services such as hall hire and sports facilities. The concession fee income forms an integral part of the Culture and Leisure division budget, contributing to the costs of delivering valuable frontline services. The council's grounds maintenance contract alone has an estimated annual contract value of over £3.8m.</p>
<p><i>Ensuring more user engagement in determining safety management plans</i> Residents' rights, needs and safety must form a fundamental part of the events policy as well as the dedicated safety management plans for individual events. MACs and Friends groups need to play a full part in determining these safety plans at a formative stage. One key issue will also be how the events plan will be checked and enforced by the council.</p>	<p>Responsibility for developing the event safety management plans rests with the event organiser and not the council or other agencies. The Event Safety Advisory Group of relevant professionals challenges and scrutinises the plan. Event organisers may consult others in the development of the plans. Event organisers are responsible for the safety of their event and the plans. Being a consultee in the development of</p>

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<p><i>Post-event consultation and evaluation for larger events</i> For larger events, a formal evaluation exercise should be conducted after each event, including obtaining the views of local residents and users of the Common impacted by the event, as well as views of those who attended the event.</p>	<p>the plans rather than a co-author maintains separation of roles, responsibilities and liabilities.</p> <p>The revised policy introduces a requirement for post event engagement and feedback with local communities to inform event evaluation.</p>
<p><i>Types of events interested in</i> Events should need to demonstrate how they help the achievement of wellbeing and health objectives and have community relevance. This should take priority over a desire to hold large income-generating events. Events need to be of a suitable size for the type of Green Space where they are held, rather than shoehorning in larger events because they generate more revenue. Events should be best suited to the location, venue structure, safety, and wellbeing of residents as well as the surrounding environment. Consideration should be given to other site venues which might be more suitable for certain events. The Council should assess each Green Space in terms of its suitability, what size events are possible, the types of events it is desirable to hold there and their frequency, and how easy it will be to mitigate any adverse ecological impacts. These assessments would need to be taken into account in the appropriate licence applications. Social inclusion outcomes should also be included in the list of criteria for assessing the suitability of events, and accessibility standards should be incorporated into event planning. One big issue is paid-for events: consideration needs to be given to restricting paid-for events to a designated amount of green space and time across the Borough. All events on the Common should primarily be for the benefit of local residents. and appropriate for them and local users. There should be consultation on a forward events programme. The assumption that events bring positive and lasting benefits needs to properly quantified, and in some cases challenged - very little analysis of the negative impact of events has been undertaken. The risk is that an event proposal may overstate positive values and understate negative ones. There</p>	<p>The council considers a wide range of factors when determining whether or not events should be granted permission. This includes site suitability and impact, social benefits, local economic benefits, track record of event organisers, and potential impact on the park, open space or common. In coming to decisions, the council weighs the potential benefits and potential negative impacts. Events are already declined under the 2014 policy or directed to other locations than the one applied for. This is not expected to change.</p>

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<p>needs to be recognition that event which might be recognised as have wider positive value does not occur at a negative or disproportionate scale for those local neighbourhoods who bare the most immediate adverse impacts.</p>	
<p><i>Event impact experienced</i> Damage to ground following funfair</p>	<p>The terms and conditions include a requirement for a deposit to fund any necessary reinstatement works. Works are carried out if required.</p>
<p><i>Allowing events on grass areas in winter</i> The Council should assess each Green Space in terms of its suitability, what size events are possible, the types of events it is desirable to hold there and their frequency, and how easy it will be to mitigate any adverse ecological impacts. These assessments would need to be taken into account in the appropriate licence applications</p>	<p>See Type of events interested in section.</p> <p>In additions, the policy wording has been strengthened to clarify that in addition to the playing seasons for different outdoor sports, any expected recover time would need to be considered. The policy now clarifies that decisions to permit events on grass areas during the wetter months would need to be taken in consultation with the relevant Cabinet member to ensure democratic oversight and accountability. It is expected that events during the wetter months would be rare.</p>
<p><i>Protection of ecological sites</i> Events need to be of a suitable size for the type of Green Space where they are held, rather than shoehorning in larger events because they generate more revenue. Events should be best suited to the location, venue structure, safety, and wellbeing of residents as well as the surrounding environment. The Council should assess each Green Space in terms of its suitability, what size events are possible, the types of events it is desirable to hold there and their frequency, and how easy it will be to mitigate any adverse ecological impacts. These assessments would need to be taken into account in the appropriate licence applications.</p>	<p>See Type of events interested in section.</p> <p>In addition, the policy has been amended to include involvement of the council's ecology and biodiversity team to agree distances of event sites to areas of ecological importance.</p>
<p><i>Changing event end times</i> This should be strictly adhered to and not be subject to any licensing process nor changed under "certain circumstances"</p>	<p>The later event end time in exceptional circumstances has been retained in the final policy. This recognises that there may be rare occasions when events may last longer. Specific examples may include major international sporting event fixtures that end after 10pm or events such as screening of Olympic and Paralympic Games ceremonies. Any decision to permit events beyond 10pm would be taken in consultation with the relevant Cabinet member to ensure democratic oversight and accountability. The policy has been amended to</p>

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<p><i>Event terms and conditions</i> T and C's need to be accompanied by a proportionate and clear enforcement dimension with conditions adhered to in all circumstances. If Enable run an event, then this enforcement review needs to be undertaken by the council. The council also needs to employ its environmental health monitoring systems in assessing ecological and environmental conditions. The organisers of events need to know the expectations of local residents and users. They should be responsible for undertaking a condition survey prior to approval of their contract.</p>	<p>state that no event infrastructure may be removed from event sites after 10pm.</p> <p>The terms and conditions include deposit mechanisms. Event organisers that have not demonstrated they can comply with conditions can be refused future events and this already happens. The revised policy does not change this. The council's environmental health and regulatory services, and highways departments, alongside the police, fire brigade, TfL form the safety advisory group and review and challenge event organiser's event management arrangements.</p> <p>In addition, the final policy has been expanded to require pre and post event inspections and to state that event organisers must follow the instructions of the council or its agent in relation to protection of infrastructure. The final policy has also been amended that for events in categories B and C, the inspections must include the council's biodiversity and ecology, and tree teams.</p>
<p><i>Care of grass areas, trees and infrastructure</i> There needs to be a stronger element in the policy of minimising and mitigating effects on green spaces with minimal disruption to the environment and wildlife. One very strong objection to holding more events is their damage to the Common especially in periods of adverse weather, even if events are restricted to the summer months. Although measures are in place, there needs to be more confidence that they can cope with challenging and increasingly unpredictable environmental conditions. Clear biodiversity monitoring will be required at each event site in order that the state of biodiversity can be assessed before and after events. This needs to be a core part of any new licence application. Wandsworth Council does operate a sustainability guide for running events although this appears to be advisory rather than contractual. E.g. 'Identify species on site and their vulnerability to the nature of the event being run ... Identify species' sensitivity to noise and light pollution.</p>	<p>The final policy has been expanded to require pre and post event inspections and to state that event organisers must follow the instructions of the council or its agent in relation to protection of infrastructure. The final policy has also been amended that for events in categories B and C, the inspections must include the council's biodiversity and ecology, and tree teams.</p> <p>The policy has also been strengthened to state that the terms and conditions will be reviewed regularly to incorporate evolving best practice in event management, including in relation to ecology.</p>
<p><i>Maximum audience size compliance</i> TC MAC supports this change.</p>	<p>Noted. In response to the consultation, the final policy now includes the criteria for different event size categories. It also includes clarification how</p>

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	<p>event size will be determined for events with a set capacity (e.g. a circus) compared to events where people may come and go (e.g. a fairground or market). It also expressly states that no events with over 10,000 attendees would be permitted.</p>
<p><i>Frequency of large events</i> The number of 'event days' should include site build and removal as this is far more extensive in terms of impact; including the total number of days an event will affect the green space would be more transparent.</p>	<p>Single event days can take the same amount of time to build and remove as multi day events using the same event infrastructure. Given it is not possible to anticipate how event days will be combined, build and removal day limits cannot be included in the limits.</p> <p>An additional requirement has been added into the policy requiring event organiser to demonstrate that they have minimised the event site build and removal time.</p>
<p><i>Variation to the events policy</i> This depends on what constitutes a minor change with specific examples to be able to assess the impact of these.</p>	<p>It is important that minor changes, such as references to new or changed legislation or best practice can be incorporated in a timely fashion without carrying out a full review of the policy. In response to the consultation, the policy now includes clarifications on what constitutes material and non-material amendments.</p>
<p><i>Event definition</i> This will depend on how this is enforced across all of Wandsworth green spaces and whether there is Parks and Events Police capacity to undertake this. At present there are birthday parties on the common which don't cause problems, and this may reduce access to the common for some groups. Plus, if there are last minute attendees to these small events, meaning that they go above the 30 person limit, will the organisers be liable to a fixed penalty notice?</p>	<p>There have been no changes to the definition of an event. It follows best practice guidance and provides clear parameters for determining what counts as an event. All enforcement action is reasonable and proportionate, considering the circumstances.</p>
<p><i>Encouraging sustainable events</i> There needs to be greater clarity in the policy on what is being measured here. Are clear targets going to be set for the event organisers, and if so, how are these targets decided on?</p>	<p>Best practice in sustainable event management is constantly evolving as new sustainable products enter the market. Including specific wording in the policy would lead to the policy being out of date quickly and requiring full review to make changes that reflect best practice. The final policy now clarifies that the terms and conditions for hire will set specific requirements and that the terms and conditions must be reviewed at least every two years to update requirements if best practice has evolved.</p>
<p><i>Consultation and engagement on events</i></p>	<p>The revised policy widens consultation and engagement beyond park, open spaces and</p>

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<p>Consultation on a forward events programme needs to be comprehensive, not just involving neighbours and those involved with the Common, but also people who might attend events locally. For each event, the relevant MAC needs to be involved in reviewing the proposed event plan alongside the council and other authorities.</p> <p>Each event plan should include the following information:</p> <ul style="list-style-type: none"> • the type of event • the business case including how the event will be funded and any income target • the proposed location • duration including setting up and taking down times • how the local community will be notified about the event • planned numbers on each day of the event • proposed community benefit • how the event will promote inclusion • planned maximum noise levels • adequacy of public transport for the event particularly afterwards • damage limitation measures. <p>Once an event has been approved, the Council must communicate timely information to stakeholders to ensure they have ample time to comment. For larger events there needs to be an adequate complaints process including a dedicated complaints phone line when the event is running.</p>	<p>commons stakeholder groups to wider residents who have a stake in the location. The revised consultation arrangements are focused on event impact minimisation and mitigation. It does not include consultation on proposed programming. Programming is informed by council strategies and priorities, all of which have been subject to separate consultation and are refreshed from time to time.</p> <p>Event plans for larger and higher risk events are reviewed through the safety advisory group (SAG) approach, which is well established across the country. More detail can be found on the HSE website. SAGs consider the plans and advise, taking into consideration local stakeholder concerns. The plans and other documents organisers must provide as part of the application process cover the areas highlighted.</p> <p>The revised policy includes a range of channels for feedback during and after the event. It also includes requirement for communication once an event has been approved. This is a significant increase in consultation and engagement requirements compared to the 2014 policy.</p>
<p><i>Social value for commercial events</i></p> <p>The Social Value approach is much broader than just free activities and community partnerships if to be fully utilised. The various measures need to be translated into events and need to have clear criteria and objectives. The positive and lasting benefits need to be fully quantified and independently assessed. There also needs to be differentiation between local benefits (i.e. for the common), neighbourhood benefits (for residents surrounding the common), and borough-wide benefits. Arguably</p>	<p>The policy requires commercial event organisers to comply with the council's social value framework. The framework sets specific measurable targets the council applies across a range of contracts. There are no changes to this policy clause following consultation.</p>

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the social value approach needs to be employed in determining which events are relevant to particular green spaces.	
<i>Ticketed events and supporting inclusive access</i> For Tooting Common this should include Lambeth residents.	The Access for All scheme is a dedicated programme to make Wandsworth a fairer place. It covers a wide range of services and opportunities and is open to Wandsworth residents only.