

Appendix 9

Submission from: Further submission from Friends of Wandsworth
Common

Submission comment	Response
<p>We have been receiving a good deal of email, social media and verbal feedback from our membership, as well as other users, since the consultation went live, and we held our AGM on May 6, at which this policy was discussed. We will aim to summarise the general topics that constitute the main reasons for objection that we have been given from a considerable number of people.</p> <p>The overwhelming view is of strong opposition to holding large events on Wandsworth Common, for the reasons stated in our joint submission of May 7. Some have given support for certain events, but none support very large events such as in category B & C.</p>	<p>In response to consultation feedback, no Category B or C events will be permitted on Wandsworth Common.</p>
<p>There is a strong view that the current and revised Events policy does not allow sufficient differentiation between different greenspaces. We note that there is a separate Events policy for Battersea Park, but to cover all other greenspaces in the same policy, whatever size or type, is utterly inappropriate, unless the document clearly acknowledges the different characteristics of each greenspace and makes provision within it for the handling of each one differently.</p>	<p>In response to consultation feedback, no Category B or C events will be permitted on Wandsworth Common.</p>
<p>Two of the three largest greenspaces covered by the Policy are commons, rather than parks, and these are of course covered by different legislation. That of itself argues for separate consideration of them in the Policy.</p>	<p>The final policy requires that event organisers must secure all necessary permissions in addition to obtaining permission under the parameters set out in the events policy. This includes permission from the Secretary of State for use of common land where required.</p>
<p>More generally, to have the same options applying to different types and size of greenspace seems to be a major shortcoming in the Policy. This can be addressed by having subsections for each issue or greenspace, or an adapted separate policy for each greenspace.</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. The policy provides the framework for making these decisions.</p>

<p>Even more importantly, the policy gives far too little acknowledgement of both the positive mental health attributes of greenspaces, especially commons, as vital places to connect with nature in an urban environment, and to their role as key habitat for wildlife and flora, providing essential biodiversity in our already strained, overused urban areas and polluted atmosphere. This is a glaring oversight and flies in the face of the Council's own environmental and sustainability strategy, the WESS.</p>	<p>The covering report sets out the context for the policy, including the benefits. The covering report forms part of the decision-making information. In addition, the EINA sets out the potential negative impacts in terms of loss of temporary access for health and recreation benefits. The policy itself contains a number of policy clauses designed to protect the natural environment. In response to consultation feedback, many of these have been strengthened further.</p>
<p>We appreciate that the events policy was originally drawn up in 2014. Since then, awareness has grown hugely of the increasing impact of climate change and biodiversity loss, with the Council itself declaring a climate emergency. This argues for much greater weight to be given to these issues in 2025.</p>	<p>The policy balances a range of factors and issues as set out the in covering report. The policy itself contains a number of policy clauses designed to protect the natural environment. In response to consultation feedback, many of these have been strengthened further.</p>
<p>It was truly shocking to discover that a premises license does not allow account of these issues to be taken when granting a license. There are only four reasons to object on - none including any mention of the impact on biodiversity. Both the application for, and the objections process for, such applications needs urgent reassessment and correction! In the same way, this Events Policy must also take account of the parlous current state of our environment and biodiversity, and appropriately address these vital issues within it.</p>	<p>The licensing process, and the issues that can be taken into account when determining a licensing application, are determined by national legislation. The council's licensing process must adhere to the requirements of this legislation.</p> <p>The events policy recognises that there are other factors that must be taken into account when deciding whether events in parks, commons and open spaces should be permitted. It therefore covers areas that sit outside the licensing remit, including sustainability, biodiversity, and the environment.</p>
<p>Many of us love a reasonably large event, such as the "proms in the park" in Battersea Park, but we have to balance this with the more profound needs of humans and the other living things that share space on Earth with us, which form the building blocks of our own existence.</p>	<p>The policy balances a range of factors and issues as set out the in covering report. The policy itself contains a number of policy clauses designed to protect the natural environment. In response to consultation feedback, many of these have been strengthened further.</p>

<p>Events don't have to be huge in order to provide a sense of community and enjoyment - the positive reasons given for holding Events. For example, we held an open public litter pick/ litter awareness event in 2021 under 'Love Parks' and our first ever dog show last year, both very helpfully supported by Enable. Both events attracted a few hundred people and were enjoyed and appreciated. Both events, however, were used to inform and educate as well; the former being obvious, the latter about dog health, dog control and the terrible impact of dog flea treatment on the catastrophic effect on aquatic invertebrates. So behind an enjoyable community event of a very modest size, they also addressed how to improve the environment and other users' enjoyment of the green space.</p>	<p>The policy allows for a range of events of different sizes.</p>
<p>There is plenty of scope to run multiple smallish events in each green space, relevant to that green space and the local population. Huge events attract people from far outside the Borough which surely is not required.</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. The policy provides the framework for making these decisions.</p>
<p>In terms of the size and frequency of events, there is a glaring contradiction in the Policy when it says that Category C events are to be regarded as 'extraordinary' and yet can occur up to four times in six months. Most people would not regard that as an accurate definition of 'extraordinary'. 'Extraordinary' to most of us would be a Royal funeral or Jubilee, winning the World Cup or Wimbledon etc - once in many years, not several times a year.</p>	<p>In response to consultation feedback, no Category B or C events will be permitted on Wandsworth Common.</p>
<p>Both the Friends of Wandsworth Common and the MAC feel that neither category B nor C events are appropriate for Wandsworth Common.</p>	<p>In response to consultation feedback, no Category B or C events will be permitted on Wandsworth Common.</p>

<p>The largest events we can remember on Wandsworth Common (and including since 2014) are the annual Drakes funfair, Zippos Circus, our own litter awareness event in 2021, and, for the first time last year, the FoWC dog show. As you will be aware, both Drakes and Zippos have sometimes created ground damage issues, caused disruption to Common use, and come in for negative comment. Our view is that nothing larger than them should be considered. If that is the Council's intention too, as it seems to have been so far - since 2014 at least, we feel this should be made explicit in the Policy.</p>	<p>In response to consultation feedback, no Category B or C events will be permitted on Wandsworth Common.</p>
<p>Finally, we feel that the provision in the Policy simply to consult MACs and Friends groups falls far short of what is needed. It is not appropriate just to consult on damage limitation provisions, once an Event has been agreed by some remote committee. We would like to be consulted a priori about the types of events being considered, in a timely way, to influence the approval, or not, of the event. We are after all representing users, for whom these events are considered to be of benefit. We do appreciate that in the main, MACs and Friends' groups do not generally have huge numbers of young members, but our members are sensitive to environmental issues and therefore represent all those who understand the need to take care of the environment for future generations, rather than just "having a good time" at any expense. Surely this is something we in influential positions now all have to be responsible for.</p>	<p>The revised policy widens consultation and engagement beyond park, open spaces and 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>