

Appendix 7

LB Islington representation

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**Islington Council Public Protection
Licensing Act 2003**

**REPRESENTATION FORM FROM ISLINGTON COUNCIL IN RESPECT OF
REVIEW APPLICATION FOR A PREMISES LICENCE FOR FINSBURY
PARK HELD BY LIVE NATION**

Your Name	Jan Hart
Job Title	Service Director (Public Protection)
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Name of the premises you are making a representation about	Finsbury Park
Address of the premises you are making a representation about	

This representation relates to the following licensing objective(s)

Please tick one or more boxes

- | | |
|-----------------------------------------|---|
| 1) the prevention of crime and disorder | X |
| 2) public safety | X |
| 3) the prevention of public nuisance | X |
| 4) the protection of children from harm | |

Background information

Islington Council appreciate the difficulties caused by the current financial climate and the problems that this must present in maintaining Finsbury Park, which is a valuable asset to all residents in the local area.

With Finsbury Park being located at Islington's border, it is a welcome resource that many of our residents enjoy. We fully understand the reasons why Haringey Council have been attempting to expand events, including Wireless Festival, in the park and at the same time raise much needed income for the maintenance of the park. However, this year's event programme has had an unacceptable impact on local residents and we hope that we can find a constructive way to address them for future years.

The programme has expanded significantly this year, including six concerts at the maximum capacity for the park. With many residential streets, a major transport hub, retail and licensed premises surrounding the park, the impacts on Islington cannot be ignored.



We had concerns following last year's concerts that the infrastructure and levels of management were insufficient, even for the lower capacity agreed due to the works at Finsbury Park Station. However, none of this was taken on board and the maximum capacity was reinstated.

Unlike Hackney Council, Islington Council was not given the opportunity to engage with the licence holders. The consequence of the measures agreed with Hackney through these discussions was an increase in the nuisance suffered by our residents, resulting in more complaints. This has escalated to local residents requesting to join the review of Live Nation's license.

The major concerns we raise are those of noise, insufficient management of ASB and crime, parking, traffic, street cleaning, capacity and safe egress. We had to deploy our own staff to deal with issues, which at a time of financial pressures and limited resources is frustrating. The council staff made many useful observations, including photographs and videos which will be submitted. The lack of safe access to the site in the event of an emergency was particularly concerning, even more so as two young people sadly died at the festival.

The prevention of crime and disorder

The premises licence boarders an area that is part of London Borough of Islington's (LBI) Holloway Road and Finsbury Park Cumulative Impact Area: This area features prominently in alcohol related crime datasets and the three underground stations in the area are identified as transport hub crime hotspots.

LBI has been working with partners and support services to tackle street drinking within this area and although its intervention strategies have been largely successful in reducing the scale of the problem, it is a recurring issue, compounded by the fact that the area is saturated with licenced premises. When events take place, LBI as the licensing authority has to restrict the supply of alcohol in order to minimise the impact of public nuisance arising from the consumption of alcohol.

LBI's expectation for this area is that only well managed venues should operate beyond 23:00. LBI has adopted a Borough Wide Public Space Protection Order (PSPO), sometimes known as controlled drinking zones, to deal with anti-social alcohol drinking in public places.

The PSPO gives Police the ability to deal with alcohol related anti-social behaviour as it gives them the power to confiscate alcohol or require a person to stop drinking in public if they are causing a nuisance.

LBI work closely with the Met Police to ensure a targeted approach to enforcement. Haringey do not have a PSPO covering Finsbury Park and on event days this can cause issues on and across the borders of the Borough.

We would expect that in advance of any concert it is advised that there are restrictions on drinking alcohol in public in the vicinity of the park.

Alcohol and tap water provision within the Festival Site

Although it was well documented that they were management issues around the bars at the first full weekend for the Concerts in Finsbury Park, 29th June to 1st July 2018, it is not clear what restrictions are in place around an individual's ability to purchase alcohol at the internal bars.

When football matches and concerts take place at Emirates Stadium, the availability to purchase is done on a risk assessed basis. We have requested a copy of Haringey's licensing strategy in relation to the management of alcohol provision, and consumption, within and around the event site for Finsbury Park events, but have not received any documentation to date.

We received a number of complaints from Islington residents linking local area ASB to intoxicated persons in the vicinity of the concerts during the two main 2018 event weekends. When referred to Haringey for investigation we were advised that it couldn't possibly have been concert attendees as they weren't able to purchase significant quantities of alcohol within the festival site. This judgement was based on the widely reported difficulties concert goers had with queues in excess of 2 hours.

The difficulty in obtaining alcohol and significant queues is not disputed however, the reality of the situation, witnessed and reported, within the festival site was that those patrons who did suffer queuing in the direct sun, purchased as much alcohol as they could physically carry once they finally got served. This included Beers, Cider, Spirits and full 750ml bottles of wine.

The lack of controls in relation to quantity of alcohol per person and the excessive queuing simply encouraged binge drinking of a high quantity of alcohol within a short space of time. This situation could clearly have led to the level of intoxication for customers witnessed by Council officers on egress and contributed to the reported ASB within Islington.

It was also widely reported that there were issues in respect of the free availability of free tap water at the festival and that festival goers attempting to bring sealed 500 ml bottles of water onto the site were having to open the bottle and pour it away.

LBI therefore expects that the sale of alcohol and the provision of free tap for any future festival is better managed and controlled. This could include a restriction on the amount of alcohol individuals can purchase per transaction. The generally expected restriction for similar large events is 4 pints or single spirits or a bottle of wine per customer.

Public safety

It is our view that more consideration needs to be given by the licensee to managing crowds once they leave the event, including the need to have a detailed egress and queuing plan for Finsbury Park station.

Council officer observations during event egress clearly identified that the crowd barriers installed in and around Finsbury Park station are insufficient to manage the significant numbers of people egressing into the station. The duration of the road closure and level of staffing is in our view insufficient to install an appropriately robust barrier plan on to Seven Sisters Road.

The single skin barrier that was deployed to funnel festival goers into Finsbury Park station from Seven Sisters Road was deemed insufficient and when coupled with the fact that there were severely limited, if any at all, stewards deployed to manage the barrier on the Islington side of Seven Sister's Road, it was at best ineffective, at worst, with persons climbing, breaking and stepping over fallen barriers, a clear and potential hazard to health.

It was the observation of Council officers that the minimal level of barriers utilised and the lack of direct supervision led to significant numbers of persons in the queue for Finsbury Park station breaking or climbing the barriers to egress into Islington instead. Given that officers were advised by a stewarding supervisor during egress that there was no shortage of stewards and that they had been deployed as planned, this would indicate that sufficient steps to encourage the majority of festival goers to egress via Finsbury Park station were deliberately not taken thus allowing easy egress into Islington's residential streets.

VMS signs on Seven Sister's Road clearly encouraged people to walk home via Islington however no walking route was agreed or publicised and there was no stewarding present. The consequence of this was wider use of the residential streets in Islington for egress and residents suffering from the noise and nuisance that came with it. Additional staff were deployed at Islington's costs for the Wireless weekend to give some extra reassurance to our residents. There were many reports of drug taking and dealing in the Islington area associated with the

event. Stewards did not address this and whilst policing for the event is provided and paid for by the licensee, they do not provide cover in Islington. It is therefore left to our local police to address this with no extra resource.

The street cleaning operation after the event was poor and resulted in Islington deploying additional resources to bring the area to an acceptable standard. Islington would prefer to be given the ability to clean its own area on a cost recovery basis rather than the continuance of a tri-borough clean up over which we have no control.

LBI has continuing public safety concerns that an event of over 10,000 could not be held at the same time as any event at Emirates Stadium.

Event Capacity figures

LBI have requested both final capacity figures and a DOT Location Plan for the stewarding positions in relation to 2018 Finsbury Park Event Days which have not been provided. If the final attendance figures were significantly down on the licenced capacity of 45,000 for these events, which given LBI officers assessment during egress appears likely, and Islington is still experiencing significant issues, it raises concerns as to the impact on the licensing objectives if we were to experience a fully attended sell-out event in the Park.

The prevention of public nuisance

Islington residents near to the Finsbury Park site currently have the impact of Arsenal match days and concert events and would suffer from the potential cumulative impact of large noisy crowds of people leaving the Finsbury Park site on days that would otherwise act as a quiet period and respite from the football season.

The existing background sound measurement positions date back to the 1990s. The area, festival site lay out and sound systems used have changed considerably since then. There are no monitoring positions within Islington. In response to this, there needs to be a review of the monitoring positions, the addition of a location in Islington (agreed with us) and an updated background sound survey carried out for all positions.

Parking

The use of Finsbury Park for concerts brings significant numbers of additional vehicles into Islington causing both issues for residents in relation to public safety, public nuisance and crime and disorder.

The Parking Zone in Islington for the surrounding wards are

Finsbury Park Ward

Mon - Sat 8.30am - 6.30pm

Highbury East

Mon - Fri 8.30am - 6.30pm, Sat 8.30am - 1.30pm

Highbury West

Mon - Fri 10am - 2pm

Hillrise

Mon - Fri 10am - 2pm

The Parking Zone restrictions detailed above mean that on major event days, the LBI residential streets within the Highbury East and Highbury West areas become unofficial event day parking locations for festival and concert goers.

LBI residents have as a result reported significant incidences of ASB linked to festival goers parking in their roads such as loud music from car stereos both before and after events, inaccessible and blocked roads and, for certain event days, the prevalence of people using and selling nitrous oxide in the local area.

The number of cars trying to leave the area at the end of event days and subsequent congestion also causes noise and disturbance linked to car horns and road rage.

We have been provided with footage from a resident of an Ambulance being unable to get down a residential street due to the additional traffic. This poses a significant risk to public safety for both festival goers and Islington residents.

It is highly unusual for a large event site to not have additional controlled parking zones for event days.

Both LBI and Hackney operate a scheme as an extension to the existing CPZ operational hours for large scale event and/or football home match days which is designed to prioritise local parking space for Islington and Hackney residents and businesses.

LBI therefore recommends that before Finsbury Park can hold any further concerts, Haringey fund the cost of implementing an additional control parking scheme within Islington for Finsbury Park Event Days. It is recommended that this scheme operates from 08:30 until 20:30 on any such event day.

When this licence was originally granted in 2014 Islington Council raised concerns about the lack of a controlled parking scheme, so it is disappointing that this remains outstanding. For Wireless weekend, emergency parking measures were brought in where this was possible and enforced at Islington's expense as the previous weekend's events had generated complaints and traffic problems.

Traffic Management Order

This year the organisers sent a letter out all residents affected by the traffic management order for the event.

It became clear from this letter that a significant number of Islington residents were being restricted access to their properties on paper for 75 minutes. In reality it was witnessed by officers on the evening that closure was actually in place for over 2 hours on each day.

Despite assurances that residents could gain entry to their homes with suitable proof of address, we received complaints from local residents that they were refused access.

One report stated that a resident with a small child was advised to leave the child in the car seat at the back of the vehicle and return when the closure was lifted. This is simply not acceptable. On one of the evenings the TMO wasn't lifted until 23:48.

In addition, the way the road closure was implemented on Blackstock Road caused significant traffic confusion. This was the result of the closure only being implemented at the corner of Rock Street, and not at the junction of Ambler Road. This problem was raised directly by officers on a number of occasions with the traffic marshals but this was never actioned on the ground. This resulted in significant traffic jams and also on one evening leaving a bus driver stranded for over three hours.

Residential inconvenience

The number of homes completely land locked by the festival event road closure is approximately 1000, we therefore insist that all future traffic management orders (TMO) affecting Islington residential addresses are drafted by Islington. Despite numerous requests the adopted TMO has never been forwarded to the council – we have only a draft version so are unsure as to what was adopted.

For 2018, the residential roads into Seven Sister's Road from Hackney were fully barriered and stewarded for egress, yet once people crossed the border into Islington, no staff were being deployed.

We have been informed that festival organisers deployed an additional 87 SIA Security officers into Hackney Streets over the Wireless weekend, after concerns raised by Hackney officers during egress over the previous weekend. This provides reassurance and security for Hackney residents however, it simply just pushes a greater number of festival goers into Islington where movement was completely unrestricted and where no additional stewarding was provided, despite raising our concerns.

The traffic management order also closes Stroud Green Road and officers observed this being implemented far early than advertised to residents. This meant that any residents trying to get back to their homes on the north side of Finsbury Park station by car after 21:00 were unable to return.

The lack of stewards or signage in this location led to officers witnessing a high level of frustration from residents. The only people in this location available to give advice were the Police who hadn't been briefed as it was not part of their deployment.

Taxi Collection

We had been advised that after discussions, a customer collection point in Haringey was to be established for after the event. This did not materialise and a GPS restriction was used which pushed taxis into Islington residential streets.

Below are suggested conditions that could be added to the licence to in order for Islington's representation to be withdrawn

- Any traffic management order that may affect Islington residential roads is drafted by us;
- An agreed event day parking zone is put into operation in the Islington residential streets around the park, with the implementation costs met by the licence holder;
- A crowd management plan to deal with anti-social behaviour and egress into Islington needs to be agreed with us for every event over 15,000, giving full details of the number of SIA security, dot location plan and hours and roles at the event;
- Greater engagement has to be had with local residents, and any letters or other consultation documents effecting Islington residents will be cleared by us before issue;
- A report is to be commissioned by the licensee, using an appropriately experienced & competent person, to review the existing LA90 1-hour background sound levels at the existing six monitoring positions. The report shall include new background sound surveys at the existing positions and include a background sound survey at a new monitoring position to be agreed with the London Borough of Islington's Public Protection

Team. The report shall be submitted to and approved in writing by the London Borough of Haringey, London Borough of Hackney and London Borough of Islington prior to any event days in 2019.

- Islington is given back responsibility for cleaning its own streets after events and the full cost of this operation is met

We have no wish to end concerts at this stage and believe that controls can be put in place to ensure that the capacity fits the available area and that licence holders commit sufficient funds to managing the impacts so that costs are not incurred by our council.

If we were to have written agreement on the addition of conditions covering these points, we would not proceed with a representation.

We note that there are other licences in place for Finsbury by an associated company also under the Live Nation Umbrella.

Therefore, whilst the review is in respect of Wireless, we hope that they are requested of Festival Republic by way of a minor variation otherwise they can continue to operate without controls.

We welcome the opportunity to work with you to use our collective expertise to reach a solution.

Additional submissions

Should the suggested additional licence conditions not be accepted Islington proposes to supply the following additional information as supporting evidence in respect of this representation for consideration at the Licensing Committee meeting.

- Copies of officer correspondence between Islington and Haringey
- All Islington Council Inspection reports and photographs from 2016 - 2018
- A table of all complaints directly received by the Islington council in respect of Finsbury Park events.

Date: 1 August 2018