

Comments by Lock N Load to representations against the Sw4 2019 license application

1/ Mr Davidson

When it comes to exceedances from 2016 and 2017, these are very minimal and **never of more than 1 db**. So in 2016, there were 3 instances (15 minute readings) out of 140 readings taken over the 3 event days. In 2017, there were 7 exceedances again from 140. So; percentage wise that is 2% in 2016 and 5% in 2017. As we have such modern monitoring equipment on and off site, one identified, we are invariably able to deal with these issues promptly. In 2018, there were 5 exceedances over the two days so again 5%. These were of 1db and at one point of 2db on two consecutive readings which was due to technical problems onsite.

Mr Davidson says that there is a public nuisance in the area of this home. But Mr Davidson was the only person living on Clapham Common North Side who rang in to the site hotline all weekend.

We submitted the Sw4 after show compliance report to Lambeth Events on 26 September.

Flyers were posted through local doors on Wednesday 22 August. Copy attached.

Mr Davidson claims that there are periods of silence in the traffic noise on Clapham North Side. We would suggest that this may be the case in the dead of night but for most of the day this road is very busy. Plus there is also a lot of aircraft noise overhead.

Please also read the Sw4 response to negative reps document which deals with specific sound aspects of Mr Davidson's representation.

2/ Mr Frankland

We believe that the Clapham event site is handed back to the Council in a cleaner state than when we take it over. The event also cleans pre agreed areas that we are used for egress.

Lambeth charge us to clean the neighbourhood around the Common after each event day and by all accounts, their contractor does a good job.

Mr Frankland seems not to be aware of the Park Levy Fee that we pay Lambeth when hiring the park. In 2018, we paid £30,000. We are told by Lambeth Events that this money is being used as follows:

- Boundary security (replacement of defective fencing with new bollards) – up to £10,000
- Paddling pool (replacement of existing pumps to ensure a reliable water system) – up to £10,000
- Battersea Rise playground (refurbishment of play infrastructure) – up to £10,000

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It must also be noted that Mr Frankland no longer lives in Clapham but in Putney were he cannot possibly be affected by any of the apparent issues he has written about.

3/ Miss Jasinska

There is no representation from the police on any matter including any supposed marked increase in crime and disorder in the vicinity of the Clapham event site on the Sw4 weekend. The suggestion that local residents are not safe to walk on the Common when the event is being staged is rather farfetched and not substantiated by any evidence.

Events are only allowed to use 10% of the Common therefore leaving 90% of its green open spaces for the use of the public.

Sound levels from events on Clapham Common do not exceed other urban green sites in London or other cities. In fact, on the low end which is the bass element of sound, Lambeth sound restrictions are lower than many sites where the high end control is the deciding factor. The levels from Sw4 do not rattle windows or shake walls as some may suggest. No one is saying that sound from events cannot be heard in the back ground but the Lambeth sound levels ensure that this creates the minimum disturbance. To that, one must add that events only occur on Clapham for a very small number of days each year.

4/ Lambeth Public Protection

Lock N Load meet with Mr Umeh last week and all the conditions in his representation bar one were already in place for 2018 (as can be seen in the 2018 Security Ops plan) and therefore have been agreed. The one which we do not agree to is paying more for enforcement officers as we already do this as part of our permit fee. We have been told by Lambeth Events that since this meeting, they and Mr Umeh have spoken on this and the matter has been dealt with. On the basis that the demanded conditions are agreed and will in turn be added to the License; one has to wonder why Mr Umeh representation has not been withdrawn.

As this has not been the case to date and we feel that many of Mr Umeh paints a false picture of Sw4, we will address some of his comments here:

Mr Umeh speaks of noise complaints associated with Sw4 but one has to wonder whether he has more than the 2018 stats to hand. As shown in the accompanying information, noise complaints from Sw4 have dropped over the last 3 years from 37 to 17 and from 36 individual complainers to 11. The 2018 are very low for an event held in close proximity to residential properties with 22 hours of music from multiple stages. These added facts are not made clear in Mr Umeh's rep and therefore give a false and negative impression.

We also wish to point out that in a recent meeting, Lambeth Licensing and Public Protection acknowledged that the stated sound levels in their representation is only relevant to a fourth event day should it happen and not the other three days. I understood that the wording in their representation was being revised to be clearer on this but to date, I have yet to see this.

Mr Umeh refers to his team issuing 4 fixed penalty notices for distributing Nitrous Oxide and one to a ticket tout. Again, this is not put into context. Nitrous Oxide is rife all over London including

Lambeth and is far from exclusive to events. Evidence of this can be seen by anyone in the form of used canisters lying around the ground on streets and in parks. It must be noted that neither the event nor the police are allowed to tackle the issue of nitrous being sold outside the perimeter fence. Only Lambeth Enforcement officers are able to deal with this and, as such, Sw4 pays the Council to do this job. The same applies to tix touts.

Mr Umeh mentions individuals attempting to gain entry to site with drugs. Unfortunately, this will always happen at events such as Sw4. The important matter is how an event deals with this problem. The fact of the matter is that Sw4 has a comprehensive anti-drugs operation in place including drug detection dogs and overt and covert teams. At no point during show was the matter of drugs coming onto site deemed to be a problem. For the record, ejection for drugs from site fell from 277 in 2017 to 145 in 2018 and police arrests dropped from 21 to 7 in the same period.

Mr Umeh also refers to an incident where an individual tried to gain entry to the event using a telescopic ladder to get over the fence. He claims not to understand that anyone could get to the fence with a ladder and not be seen. Firstly, in order to understand this fully, please see photo of a telescopic ladder below. It is 2ft high, 1 ft wide and 3" deep. Secondly, there would have been many patrons coming along to the main entrance so the area would have been very busy. So it would be possible for someone to approach the perimeter fence with such a ladder tucked under their arm without being spotted. The fact of the matter here is that this was spotted and stopped. A comprehensive perimeter fence security plan is included in the Security Ops plan showing how operatives are deployed along vulnerable sections of the perimeter. In other areas such the approaches to and the main entrance, it is felt that a combination of security in the area and police is deemed to be a sufficient deterrent. It must also be pointed out that at no time during the event did the police express any concern about fence jumping and nor was this matter brought up at any of the regular ELT meetings during event opening hours. With all this in mind, we feel that Mr Umeh is painting a false impression of the situation based on one incident where someone was caught attempting to gain access to site through use of a ladder.



Mr Umeh mentions the state of the Common after a SW4 event. This naturally depends on the weather experienced before, during and after show. In 2018, there was a lot of rain on the second event day meaning that the site looked worn when we left site. However, Sw4 paid for a professional contractor to do reinstatement ground work and after about 6 weeks the site looked a lot better than it had for the previous 8 months since before the Winterville event. It must also be stated that the Winterville 2017-18 event which is on the site in winter for 2 ½ months had a devastating effect on the surface of the Common yet Mr Umeh did not see fit to put a rep in against their 2018-19 license.

Mr Umeh mentions the fact that adding an extra day of events would stop local residents using that part of the Common for another day. We feel that it must be noted that Sw4 only takes up 10% of the total footprint of Clapham Common and that again Mr Umeh failed to make similar representation against Winterville who are onsite for 2 ½ months as opposed to Sw4's 13 days.

Mr Umeh mentions rubbish left by Sw4. We can safely state that the site footprint and areas from site to Clapham South and towards the High Street are left much cleaner when we depart than when the site is handed over to us. I am sure that Lambeth Events will also state that the surrounding area is also left clean. They contract the company to do this clean up job which we in turn pay them for.

Mr Umeh states that patrons of Sw4 descend on Clapham High Street and have a negative effect on the area. Our business survey clearly shows that Sw4 has a very positive impact on trade in the local area. When it comes to anti-social behaviour and crime, the police have not informed us of a marked or worrying increase to that effect after Sw4 shows and they have not made a representation to this effect.

5/ Lambeth Licensing

Licensing were in the same meeting with Public Protection that has already been mentioned. All the Licensing conditions were agreed to and will be included in the License conditions when issued. So again one wonders why in this case, Licensing are not withdrawing their representation. But as this has not happened, Lock N Load feels the need to address some of the wording and insinuations made in the Licensing rep so as to ensure that the reader is not misled into believing that Sw4 is a badly organised event.

In their comments about the 2018 event, Licensing say that there was a 'lack of security around the perimeter, people jumping over the fences with ladders, illegal traders and lack of stewarding on the exits points'. We refute these comments. We believe that the part relating to lack of security on the perimeter and people fence jumping with ladders relates to the one instance brought up by Public Protection above. We have already dealt with this matter but believe that the wording used here by Licensing is extremely misleading and was written by someone with no first-hand experience of the matter at hand. Again, it must be noted that the police who were onsite throughout the event and were directly involved in all security matters at Sw4, have made no representation against the event and did not mention any of these issues in the after show debrief in which both Licensing and Public Protection were present.

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On the matter of security at show egress points, it is clear in the 2018 Security Ops plan that ample operatives were planned to be at all these locations. After the event, someone from Lambeth Events claims that the numbers in the plan were not reflected on the ground at the time they were at a couple of these exits points. We have taken note of this and are speaking to our security provider on this matter. On the back of this, we are happy to include numbers as agreed in the 2019 license agreement.

Licensing go on to state that due the potential of a fourth event day being held, a raft of negative issues may result. We would disagree with much of this assessment. Although certain elements described are present at Sw4, none create a major problem there and bearing in the mind the reduced capacity of the fourth day, it is hard to believe that the situation would deteriorate should a this extra day be staged. Any event staged by Lock N Load that weekend will look to counter any such disturbance should it be created and our track record to date suggests that this would be done effectively.