

Dear Haringey Licensing Team,

## **Representation about the Wireless Licence**

Please find below my representation for the Review of the Wireless Licence. All the points in my submission fall under the Objective of *the prevention of public nuisance* and much relate to our public park. Under that rubric I have six subheadings:

- **excessive noise**
- **litter**
- **transport disruption to movement around FP**
- **denial of use and enjoyment of most of the park**
- **lingering damage to the park**
- **diversion of scarce police resources**

### **■ Public nuisance • excessive noise**

In the late afternoon of 1 July (2018), I was in the company of Haringey Councillor Bob Hare and one other, on Cllr. Hare’s Alexandra Palace Allotment. We were all able to hear “music” from the Wireless Event. The sound had managed to crest the horizon, being the brow of the ridge marked by Ridge and Mountview Roads (a feature of the terrain between Stroud Green and Crouch End).

The point being that—as I later carefully measured in Google Earth Pro—the distance as the crow flies between the southern side of Finsbury Park and Cllr Hare’s Allotment, is 2 (two) *miles*.

If I and others could hear the “music” event at such a distance, then it follows that the noise close to the source must have been loud indeed, likely excessive and possibly hazardous to hearing. The Local Authority has at least some responsibility for public health. I hope that these events won’t in future lead to claims by anyone against Haringey, for hearing loss.

The noise suffered by residents close to the “premises”—across Seven Sisters Road, in Hackney Borough—would have been intense and unavoidable. The promoter appears to have failed to discharge any duty of care toward those residents of another Borough.

(This distance of two miles happens to be the same distance from the noise source to a point in Highgate, where the “music” on the same afternoon could be heard).

Unlike possible noise leakage in a regular premises, enormously amplified live music in the open air cannot be contained. A worker engaged in disassembling the super fortress steel wall claimed to me, implausibly, that the angled parapets were designed to deflect sound upwards; it is more likely that it was to better prevent a repetition of the mass break-in seen at an earlier Wireless.

The noise goes into two other Boroughs and primarily into Hackney.

Sound heard in a radius of two miles, in a built-up and densely-populated part of London, must mean (a) that to a greater or lesser extent, the noise from the “premises” is heard in an area of up to 12.5 square miles and (b) at the centre, “heard” is more likely to mean something closer to being deafened. I have heard accounts at a southern ladder road address—with windows closed— of television being unable to be listened to. One can only imagine the sound levels in west Hackney, the Borough that bears the biggest brunt of the noise.

When taking photos of the Build on the east side of the park, I came across a woman who lived nearby. When explaining who I was and what I was about, she said she was an A&E nurse working shift hours, and her sleep had been shattered by a previous Event. She was fizzing with anger at Haringey’s policy that allowed the unbearable noise.

### ■ **Public nuisance • litter**

Despite a hurried clean-up job at the end, the park is normally left in a state that is less clean than at the beginning of the point of hire. I have seen metal shackles and other detritus left behind, that could form a hazard to any park user expecting the ground surface everywhere to be like a public park.

The west side of the park adjacent to the railway line was left in a filthy, disgusting state as a result of an overflow of Wireless patrons staying or camping there. It is not good enough that an effort is made to clean up later on.

The other particular litter that needs to be mentioned is the prevalence of discarded Nitrous-oxide canisters. These are found discarded, not only inside the park but in side streets such as the east side of Seven Sisters Road and to the north, such as Oakfield Road.

This is not merely residual litter but speaks to the drug-culture operating within and without the security wall. This, despite the notices not to take drugs into the premises and not to attempt drone flights (presumably, in order to drop drugs inside). I have read in the local press that one woman died from a drug overdose during the 2018 Wireless.

### ■ **Public nuisance • disruption to transport and movement around Finsbury Park**

There is disruption to transport services as a direct result of these events and especially at egress:

At egress time, a several hundred-metre stretch of the A503 (Seven Sisters Road) is closed between Finsbury Park Station and Manor House Underground station. The knock-on effect is that bus services are suspended or re-routed. If one were depending on a normal service, this disruption might constitute a public nuisance.

There is widespread disruption to parking and the Licensee put out a lengthy statement detailing this.

Other disruption includes cancellations for a Fun Run; British Military Fitness and at least one cancellation for Pedal Power, cycling for the disabled.

If these too-big events are allowed to continue, then the mooted cycling super highway is unlikely to be possible, as the route would simply be unavailable for weeks over the summer.

***Big increase in traffic*** Even if the claim of “only” a 27% occupation were not misleading which it is (see below), then it is still the case that the Licensee’s use of the Licence manages firstly, to *dominate* the entire park during the set-up, event and take-down and secondly, there is a halo effect that causes the event to dominate several of the surrounding roads.

It is an impressive feat of management that a small town is erected in a matter of 10 days or so, including a six-storey structure (the main stage) and a higher mobile phone mast. The biggest single component is hundreds of metres worth of steel wall; the enhanced security is I believe known as super fortress.

However, the logistics in organising such an enterprise means that heavy machinery of all description is coming and going through the Endymion Road service entrance, for days on end. Near the end, four tankers sit on standby waiting to remove what is delicately described as *Non Hazardous Product*.

## ■ **Public nuisance** • denial of use and enjoyment of most of the park

One of London's larger parks is largely off-limits to the public for the many weeks of, what a Haringey Council officer described in an email to the Licensee as, *the Season*.

This lengthy period is an irritation, not only to residents of Haringey Borough who wish to use the public park in a normal way, but also to many members of the public in the two adjoining Boroughs, Hackney and Islington.

While Haringey Borough is relatively well served for parks, Islington is not and their residents understandably wish to use Finsbury Park. The fact that some park-land is left unoccupied at the northern side of the park is of little consolation to residents of Hackney and especially to Islington, who would need to go around the sides of the park to reach the north-facing land.

For those who are *ordinarily* able to use a public park, that they are largely unable to during Wireless is a public *nuisance*. This affects all of the public but especially residents with small flats, residents without gardens, or perhaps residents with stressful family lives who simply want to go somewhere quiet.

For those residents who don't want to use the park, but merely to traverse it, the *nuisance* is that they are obliged to walk a longer distance around the perimeter, rather than a more direct route.

A similar irritation exists for cyclists who, during the build and the take-down, are confined to a narrow route between barriers and then during the "music" are pushed to the side.

### **The claim of only 27% occupation**

In a High Court Hearing, the licensee admitted to taking up 27% of the area of the park, but this is misleading. All of that 27% area claimed is prime park land: near the station, flat, unobstructed, south-facing and capable of multiple uses. In other words, the best part of the public park is removed from public use for many weeks at the height of summer.

It is unclear whether the 27% claim includes the "Boneyard" that is the large area south of the basketball courts and used by Wireless as a storage and staging area. It is not behind the high-security fencing but is off-limits to the public, including the *Pedal Power* cycling club for the disabled, who normally use it.

Moreover, during the Build and the take-down, the road between the Endymion Road gate and the service entrance is used intensively by Wireless traffic, including articulated trucks, fork-lifts and other heavy machinery. It is generally hazardous and due to time pressure, these vehicles don't always keep to the 10mph speed limit. It's not clear if this heavily-used section of road features in the 27%, but whether it is or not, it creates a less-safe entrance close to one of the main gates.

The residue of the park implied by Wireless as being available for public use, includes the council yard and offices, unusable scrubland and the park-service dumping-zone north of the underground reservoir. Plus, several other areas that are either single-use, fee-paying and/or members only: the lake, a nursery, the running track, the bowls club, the baseball corner, tennis courts and a locked-off area at the southern end.

And thus, what may appear on paper to leave 73% available for public use, is nothing of the sort. When the above factors are taken into account, it may be seen that the land left over for the general public is the least attractive land of roughly half the park. A remarkably low proportion compared with other London park concert venues.

### ■ **Public nuisance • lingering damage to the park**

One of London's larger public parks is steadily deteriorating with the inflicting of repeated Wireless events. The Heritage Lottery Fund made a big grant in 2003 that significantly improved the park and since then, residents have via Council Tax paid for a higher standard of park than we now have.

Some of the damage comprises intensified wear and tear but which passes, such as the worn out parts that David Lammy MP referred to—accurately—as looking like the Serengeti. The threadbare areas do eventually recover but while recovering, over weeks, they are much less usable. Sometimes they are roped off for re-seeding, which is an example of how the impact of Wireless is longer lasting than merely the listed Event days.

The council accepted in a stakeholder meeting, that the area dubbed the Serengeti was a sensitive, vulnerable zone. The following year (2016 or 2017?) protective surfacing was laid. When the covers were lifted, the grass was yellow but there were still blades left to re-grow. This year there was no cover and the area is back to the worst Serengeti period.

### Other damage includes:

- graffiti appearing that wasn't there before
- gouging of pavements and parkland by heavy machinery
- gouging of the access road (especially visible at the entrance to the big staging area Wireless call their Bone Yard)
- broken tree branches during the installation of the super-fortress security fencing
- staining from cooking oil spills in many places (I understand that the council has accepted from Wireless it is not cost effective\* to repair this staining on a yearly basis and that the damage would need to accumulate in order to make it worthwhile to repair).

\* council pdf: <https://goo.gl/kika1G>

It is the minor damage that tends to get overlooked in the post-event assessment so that gradually, the park accumulates the more minor damage.

This damage is so regular and recurring that the bond or deposit paid by the Licensee is normally retained by the council in full and sometimes with extra charges on top. The point being, that the council has now come to *expect* damage to the public's property. It's comparable to a bad tenant who predictably smashes up a property, but who is tolerated by the landlord because a high rent is paid. Except here, the council holds the park in trust for the public.

### ■ Public nuisance • diversion of police resources

An indirect, but significant effect of such huge events is the considerable need to police them. In order not to greatly deplete police presence in Haringey, the local force draws officers from all over London in order to watch out for trouble.

And thus a slight nuisance value tends to be suffered by all the public of London, as crime-fighting ability is weakened over a wide area, in order to supervise a concentration of up to 50,000 people in Finsbury Park.

**Helicopter**—Following each event, a police helicopter hovers overhead watching out for gangs apparently leaving the event but later returning with a possible intention of causing trouble. It is costly and a waste of scarce police resources that might be better used elsewhere.

The helicopter is deployed at about 10PM for approximately an hour and the loud clattering of its blades is heard over a wide area. I suggest that, given the time of night when many are trying to get to sleep, especially on a Sunday night, the need for this surveillance that I have seen and heard, is a public nuisance.

I don't imagine the Police force would ever claim publically that policing such an event were a (public) nuisance but I suspect they would privately think there are better ways they could spend their time. This waste of scarce police resources (their time) is independent of whoever may pay for their time.

## Conclusion

I have lived about five minutes walk from Finsbury Park, for more than 30 years. As I regularly walk and cycle through most of the length of the park in order to shop at Lidl's on the south side, I both hear and see the Events.

Wireless is simply *too big* for the location. It is unmanageable. Any and all previous attempts at mitigation have failed, the 2018 "Season" being the longest, the biggest, and possibly of the noisiest so far.

In my opinion, no conditions can be put in place to mitigate as mitigation has been talked about for four years and yet the impact of the events has simply grown larger. In my opinion, the only way to remedy this recurring problem of the so-called "season" *is to revoke the Licence*.

I would wish much luck to Wireless Festival, at a different and suitable location.

Please note, I wish to give evidence in person at the Licence Review Hearing.

Yours sincerely

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