

Dear Members of the Licensing Committee,

Re: European Christmas Festival Roe Green Park, Kingsbury Road, London NW9 9HA 29 November 2026

I write to make a **formal representation** in respect of the above application.

My representation is upon my direct knowledge and experience of Roe Green Park and the impact that large organised events can have upon the park and surrounding residential area.

My concerns relate to the licensing objectives of: **Public Safety, Prevention of Public Nuisance, Prevention of Crime and Disorder, Protection of Children from Harm**

My principal concern is the management of **vehicle access to, movement within and parking upon Roe Green Park**, particularly given the extremely limited legitimate parking provision and the fact that an event on 29 November will involve significant pedestrian and vehicle movements during the hours of darkness.

1. PUBLIC SAFETY

1.1 Vehicle access to open parkland

My principal public-safety concern is the number and control of vehicles which may enter Roe Green Park before, during and after the proposed event.

I have personally witnessed, during a previous large event at Roe Green Park, numerous vehicles being driven onto and parked across open grassed areas, I estimate well over 100 hundred that I could see from one point. Vehicles were being driven, manoeuvred and parked in areas ordinarily used by pedestrians, families and children.

This created a chaotic and potentially dangerous situation in which vehicles and pedestrians were occupying the same open recreational space. With designated paths being used as a car park. This experience demonstrates why a detailed and enforceable vehicle-management plan is essential for the proposed European Christmas Festival, which by its very nature will attract many children and their safety should be a priority.

Firstly we do not have and never had 100 plus cars at all apart from the immediate event vehicles and vendor vehicles which do not exceed more than around 30 -35 cars which are normally escorted in slowly into the enclosed fenced area and then those vehicles do not then move till after the event is finished and again they do not leave till we are happy for them to do so as we make sure all of the event goers have left the site before we allow any car movement at all.

We have security at the top end of Roe Green main entrance and do not allow any vehicles in after 11am when we have a curfew for all vendors who do come to set up and then they remain there till the end of the event.

We also monitor and make sure that any vehicles that are coming in for the church at the top of Roe Green are also taken care of so no other random vehicles are allowed to come into the park further then that point as our security is there all day .

1.3 Extremely limited legitimate parking

Brent Council's published information states that Roe Green Park has an on-site car park accommodating approximately 10 cars, this car park is permanently closed. Parking in surrounding residential roads is also limited and obstructs many junctions, driveways causing safety concerns.

It is therefore important that the Council establishes in advance how the potentially much greater number of vehicles associated with attendees, traders, contractors, performers and staff will be accommodated and flow of traffic maintained without parked vehicles causing obstruction.

The absence of sufficient parking provision must not result in drivers entering and parking indiscriminately and illegally upon open parkland. There must be credible plan for managing this entirely foreseeable demand.

1.4 Unauthorised motor vehicles parking in Roe Green Park to attend the event

Brent Council's Parks, Open Spaces, Cemeteries and Graveyards Public Spaces Protection Order restricts the use of motor vehicles within Brent parks and open spaces without the required consent.

I therefore ask the Council to establish precisely which vehicles, if any, will be authorised to enter Roe Green Park in connection with this event. The Event Management Plan should clearly identify:

- the maximum number of authorised vehicles;
- the purpose for which each category of vehicle requires access;
- authorised vehicle entrances and exits;
- designated vehicle routes;
- designated parking or loading areas;
- permitted vehicle-access times;
- how authorised vehicles will be identified; and
- **how all other vehicles will be physically prevented from entering open parkland.**

These arrangements should be clearly established before the event rather than left to individual drivers, or stewards or enforcement officers to resolve on the day.

We have a list of all vehicles that are associated with the event from event vehicles which are only a few and then the hand full of the vendors vehicles. We have all of their vehicle details and we use 2 way radios amongst our staff and security and they always verify if there is a vehicle which is not on the list as no one other than the details of the vehicles on the list will be allowed to come in.

We have a cut off time of 10.30 max 11am when all vehicles in question are all in our event space and ready for the event to start at 12pm.

There is only one main entrance into the park via Roe Green / Bacon Lane and we also do have a security member at the entrance near the play area so no vehicles come through at all from that end as well.

1.5 Separation of vehicles and pedestrians

Open parkland is fundamentally a pedestrian recreational environment. People walking through Roe Green Park do not ordinarily expect substantial numbers of motor vehicles to be travelling across grassed areas. Allowing vehicles and pedestrians to occupy the same unrestricted space creates a foreseeable risk of collision and injury.

Any authorised vehicle route should therefore be **physically separated from pedestrian areas wherever reasonably practicable**. Physical controls are preferable to reliance solely upon cones, signs or verbal instructions.

1.6 Reversing vehicles

Reversing vehicles present a particular danger because a driver's field of vision can be substantially restricted. This is especially concerning in a public park where pedestrians may approach a vehicle from several directions and where children may be below the driver's direct line of sight. The event should therefore be planned so that reversing movements are minimised.

All of the vehicles come in one at a time with hazards on at all times and not driving more than 5mph and no further movements of any cars coming in thereafter unless it's a performer then again, it's only one car and the same rule and guidance applies and there will be extra member of security that will walk and escort the vehicle in.

Where reversing cannot reasonably be avoided, **no event-related vehicle should reverse within a pedestrian-accessible area unless the manoeuvre is controlled by an appropriately trained banksman or marshal.**

1.7 Children's playground

Roe Green Park contains a children's playground. This makes effective vehicle control particularly important and being at the main entrance to the park the least effective or non-existent.

Children can behave unpredictably and cannot reasonably be expected to appreciate that vehicles may be manoeuvring in an area they ordinarily experience as pedestrian recreational space. There should therefore be an effective **vehicle exclusion zone around the children's playground.**

If the playground remains accessible during the event, physical barriers should separate children and families from all event-related vehicle routes and parking areas. This protection should not depend solely upon signs or instructions to drivers.

We put Herras Fencing around our event area and we do not interfere with the children's play ground or the exercise area of the park at all as that is kept well clear for members of the public to use as they please throughout the day as they wish.

1.8 Darkness and the November event

The date of the proposed event creates an additional and significant public-safety consideration. The festival is proposed for **29 November, (sunset is 3-56pm)** when darkness occurs considerably earlier than during spring or summer events.

Consequently, public dispersal, departure and site dismantling may occur after dark. At the conclusion of the event there may simultaneously be, substantial numbers of pedestrians leaving; families and children walking through the park; vehicles turning or reversing; vehicles entering or attempting to leave; vehicles looking for quick access from the park to avoid the queue, traders packing equipment.

This combination requires careful advance planning. A busy or frustrating departure environment must not be allowed to develop into uncontrolled vehicle movements across dark open parkland amongst pedestrians.

1.9 Lighting and safe movement after dark

If any authorised vehicle movements are to take place after dark, the Event Management Plan should demonstrate that vehicle routes, pedestrian routes, entrances, exits, loading areas and any locations where pedestrians could encounter vehicles will be adequately illuminated. Particular attention should be given to areas where vehicles may turn or reverse.

Lighting should be sufficient to ensure public safety while being positioned and directed to minimise unnecessary light spill into neighbouring residential properties.

Again as this our 3rd year delivering the same event taking place around the same time this year and the same location we always make sure of everyone's safety and again we have Tower lights in place so come evening knowing it does get dark earlier they come on automatically so we have enough lighting that brightens the area.

1.10 Build-up and dismantling

Vehicle-management controls should not apply solely during the advertised public opening hours. Significant vehicle activity is likely to occur from site construction until dismantling. Traffic-management, stewarding, pedestrian-separation and vehicle-control requirements should therefore remain effective throughout **the entire period during which event-related vehicles are accessing the park.**

We do not have more than 5 vehicles that comes at different times prior to the event and again we make sure that all aspects of safety is covered at all times as we run around 30 plus events throughout the year in and around Brent & Harrow.

1.11 Enforcement within the park

Restrictions are effective only if there is a credible means of enforcing them. I therefore request that Brent Council if allowing the licence identify in advance which Council service and authorised officers will be responsible for dealing with vehicles entering or parking upon parkland without permission.

In particular, I ask the applicant and Council to establish:

- which officers have responsibility for enforcing unauthorised motor-vehicle activity within Roe Green Park;
- whether appropriately authorised enforcement officers will be available during the event;
- what action can be taken against vehicles entering or parking without permission;
- what procedure applies where a vehicle creates an immediate danger or obstruction;
- who event security should contact when a driver refuses to comply with instructions; and
- whether enforcement will be proactively available or will depend upon residents reporting incidents after they have occurred.

The possibility of unauthorised vehicles entering the park during a planned large event is foreseeable. Enforcement arrangements should therefore be **proactive rather than merely reactive.**

1.12 Parking enforcement in surrounding residential roads

The extremely limited legitimate parking provision within Roe Green Park also creates a foreseeable risk of parking pressure in surrounding residential roads.

I am concerned about vehicles potentially obstructing: residents' driveways; dropped kerbs; pavements; junctions; restricted parking areas; and routes required by emergency and essential-service vehicles.

I request that **Brent Parking Services be consulted in advance** and that consideration be given to an event-specific Civil Enforcement Officer presence during the principal arrival and departure periods. Where vehicles are parked in contravention of restrictions, appropriate enforcement action, including Penalty Charge Notices where legally applicable, should be taken. Residents should not have to make repeated individual complaints before enforcement officers attend a foreseeable parking

problem associated with a planned event.

In regards to local parking where it is available free for any member of the public to park is something we cannot control as long as the vehicle is parked legally and if not they will get a parking ticket / removed by Brent parking enforcement that operated on the day in and around the area.

1.13 Emergency access

The applicant should demonstrate how unobstructed emergency access will be maintained throughout the event. This should include access for ambulances, fire appliances, police vehicles and other emergency or essential services both within the park and on surrounding roads.

Emergency routes should be clearly identified and protected against both authorised and unauthorised parking.

In regards to the event itself we do have emergency exit points again managed by security who are all licensed and SIA badged / license and keep entrances clear at all times for such emergency vehicles that may need to enter the park they can enter very easily if needed.

2. PREVENTION OF PUBLIC NUISANCE

2.1 Amplified music and announcements

Roe Green Park is surrounded by residential properties. The use of amplified music and announcements therefore has the potential to cause disturbance to nearby residents. The Council should carefully examine the applicant's proposed Noise Management Plan and establish:

- appropriate maximum noise levels;
- monitoring locations close to residential properties;
- how frequently readings will be taken;
- whether readings will be recorded and retained;
- who has authority to require an immediate reduction in volume; and
- how residents can contact event management while the event is taking place.

There should be an identifiable person always contactable on site with responsibility and authority for noise management.

We have a decibel counter / monitor that we use and record the readings throughout the day to the nearest household and making sure it does not exceed 30 decibels and we have demonstrated the readings before and they were well within the limit and in most cases even lower.

2.2 Vehicle-related nuisance

Event-related vehicles can also cause nuisance through: The Council should therefore establish not merely when the entertainment finishes, but **when event-related vehicle activity and dismantling are expected to finish**. Appropriate controls should remain in place until the site has been cleared.

We always makes sure that all vehicles have left sight safely until site is cleared as this is always paramount for us as everything is controlled till the end even after the actual music is finished.

2.3 Artificial lighting

Artificial lighting will clearly be required for safe operation of a November event. However, substantial lighting equipment can also affect neighbouring residential properties. The Event Management Plan should therefore identify the type, location, direction and operating hours of significant lighting equipment.

Lighting should be sufficient for public safety but positioned and shielded where appropriate to minimise unnecessary light spill.

As mentioned before we have Tower lights on site for extra lighting as we do know that in November it does get darker early.

2.4 Litter and waste

We have a waste management company employed and we make sure that all rubbish has gone even last time we event went over and beyond our fenced event area to clear up as a good will gesture even that was not rubbish created by our event.

We have litter pickers on site during the event that do a marvelous job and come evening all the bags / rubbish is removed from the park.

A comprehensive waste-management plan should cover the **whole park and immediately affected surrounding area**, rather than merely the enclosed entertainment footprint.

It should address:

- litter collection during the event;
- adequate waste receptacles;
- recycling;
- food waste;
- post-event clearance; and
- inspection of the wider park following dispersal.

The park and surrounding area should be returned promptly to an acceptable condition.

2.5 Damage to grass and park infrastructure

The proposed event takes place at the end of November, when ground conditions may be wet or soft. Vehicles, heavy equipment and concentrated pedestrian activity can damage grassed areas, paths and other park infrastructure.

The applicant should therefore demonstrate what ground-protection measures will be used and who will be responsible for the cost of reinstating any damage caused by the event. Vehicle access to soft grassed areas should be particularly carefully controlled.

3. PREVENTION OF CRIME AND DISORDER

My concerns under this objective principally relate to effective security, management and control of a large public event. There should be sufficient appropriately trained security personnel and stewards to manage not only the principal entertainment area but also entrances, exits and locations where crowds and vehicles may interact.

There should be:

- a clearly identified event-control structure;
- sufficient security supervisors;
- reliable communications between stewards and event control;
- an incident log;
- clear procedures for dealing with persons refusing reasonable safety instructions;
- procedures for requesting Police or Council assistance where necessary; and
- clearly assigned responsibility for controlling each operational vehicle entrance.

Security personnel responsible for vehicle access should have clear instructions concerning which vehicles are authorised and should not be placed in a position where they are expected to control substantial numbers of vehicles without adequate personnel or support.

4. PROTECTION OF CHILDREN FROM HARM

Roe Green Park is an important recreational space for children and contains a children's playground.

My principal concern under this objective is the potential interaction between **children and event-related vehicles**. Children may not appreciate that vehicles are operating in an area that they ordinarily experience as a pedestrian recreational space. A child may also be below the direct line of sight of the driver of a reversing vehicle.

For this reason, the combination of: **children, moving vehicles, open parkland, crowds and darkness** requires particularly careful management.

I therefore request that:

- event-related vehicles be excluded from the vicinity of the children's playground;
- physical barriers separate the playground and principal pedestrian areas from vehicle routes;
- unauthorised vehicles be physically prevented from entering open parkland;
- adequate lighting be maintained wherever authorised vehicles and pedestrians could potentially interact after dark.

These should be **preventative measures**, rather than relying upon intervention after an unauthorised vehicle has already entered a pedestrian area.

6. REQUESTED CONDITIONS

If the Licensing Authority is minded to grant the application, I respectfully request consideration of appropriate, proportionate and enforceable conditions, where legally applicable, including:

1. **No unauthorised motor vehicle to enter or park upon open parkland.**
2. A defined maximum number of event-related vehicles authorised to enter the park.
3. All authorised vehicles to be identifiable and, where appropriate, recorded in advance.
4. Clearly defined authorised vehicle routes and parking/loading locations.
5. Physical barriers preventing vehicles from accessing unauthorised grassed and pedestrian areas.
6. An effective vehicle exclusion zone around the children's playground.
7. Physical separation of pedestrian and vehicle routes wherever reasonably practicable.
8. Adequate illumination of authorised vehicle routes, pedestrian routes, entrances, exits and crossing points during darkness.
9. Sufficient trained stewards at all operational vehicle entrances.
10. Vehicle-control arrangements to operate throughout build-up, the public event, dispersal and dismantling.

11. Advance liaison with Brent Parking Services regarding appropriate Civil Enforcement Officer deployment on surrounding residential roads.
12. Advance liaison with the appropriate Brent service responsible for enforcing unauthorised motor-vehicle activity within the park.
13. Unobstructed emergency-service access to be maintained at all times.
14. An appropriate Noise Management Plan incorporating monitoring at agreed locations and an identifiable person with authority to reduce amplified sound immediately.
15. An effective telephone contact through which residents can report excessive noise or other event-related problems while the event is taking place.
16. A comprehensive waste-management and post-event cleaning plan covering the wider affected park area.
17. Appropriate ground-protection measures and responsibility for reinstatement of damage caused to parkland or infrastructure.

All the rest of the above is all covered in our Event Management Plan as we take everything seriously when we organize our events at all times.