

Stansted Parish Council response to the Southbeats licensing application

Summary

Stansted Parish council objects to the application to hold the Southbeats festival. Using the four criteria that are required for a licensing application we will show why this objection is being lodged.

1. The prevention of crime and disorder
 - a. The experience of previous events
 - b. The corporate structure
2. Promotion of Public safety
 - a. Suitability of the site
 - b. Emergency access
 - c. Exit routes from the main stage to car parking and buses
 - d. M20 exit
 - e. Pedestrian bridges over the M20
 - f. Walking and cycling dangers
 - g. Weather
 - h. Landscape
3. The prevention of public nuisance
 - a. Traffic
 - i. Assumptions
 - ii. Car parking charges
 - iii. Jams
 - iv. Traffic lights
 - b. Bus parking
 - c. Taxi capacity
 - d. Light pollution
 - e. Noise
 - f. Bar timings
 - g. Effect on local business
4. The protection of children from harm
 - a. School bus to Tonbridge
 - b. Stansted school
 - c. Drugs and loitering outside by people under 18

In our response we provide our reasoning for each of the above headings – note some of the points fall into more than one of the above categories. We then make recommendations and conditions we would like TMBC to impose should they be minded to grant the application.

After this we draw to the attention of TMBC that if a licence is granted it will still require planning permission to proceed.

Finally, we sum up by showing our concerns on the ability of the organisers to run this event successfully without causing significant problems under the four key licensing criteria.

The prevention of crime and disorder

According to the licensing application, SBE Live Limited "carry overall responsibility for the event" (P42 event plan). This company has never run a multi-day festival with camping and their ability to prevent crime and disorder should be judged by the previous one-day events. Herewith a small selection of some of the commentary on previous Southbeat's events:-

Headline: Port Lympne: Three Assaulted at Southbeats

<https://www.kentononline.co.uk/ashford/news/three-assaulted-at-festival-191027/>

Chatboard with feedback on previous Southbeats festivals:-

"I was staying 6 miles down the road, as the website said they had provided a taxi rank I didn't think to pre book one.. when it came to the end it was like free for all.. and THERE WAS NO TAXI RANK !!! I was so annoyed, it put such a downer on what had been a brilliant day for me and my friends. So we had the most Dangerous walk home back to hythe through tiny country lanes. Cars going at silly speeds."

"My daughter went to this festival she said they'd a quick look into her bag he se why lots of people were in there selling drugs, and the picking up was a nightmare country lane complete darkness and dangerous drivers as people were getting so frustrated, not good at all"

<https://licklist.co.uk/southbeats-festival/reviews>

My daughter is 16 and went with a group of friends. I drove her there and picker her up. What a complete nightmare coming back to pick her up at the drop off point. Who decided the xit for the public would be at the same place as the pick up point and the car parks? 6 Hours it took me to get in and get her out...kids walking in the road inbetween cars . It was the most dangerous thing i have ever seen and i spent the whole time holding my breath that a teenager would not get hit by a coach passing next to me. Dreadful road organisation and parking. Also the drug selling was dredful..balloons everywhere on the floor. They might have been checked for drugs when going in but these drug dealers got in over the perimeter. The car in front of me was selling drugs out of his window to people trying to find their taxis ,cars etc.

A terrible experience for a parent to watch and an intimidating experience for the teeangers. Where were the police?????

A dreadful event as was so badly organised. The queue to get iinto the festival was over three hours long !!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!!

Source: Southbeats Google reviews

Whilst we respect that SBE Live has brought in a management company – Proud Events Ltd, and increased the age to 18, we also note that Proud Events do not show that they have run an event in the country with camping. On their credentials they mention events that have taken place in cities which will have defined times and ability for large bodies of people to disperse to exit points within an urban environment.

Neither SBE nor Proud have the experience to manage an event of this scale and complexity in the heart of the countryside. The age and music type are focused on a demographic who will use drugs and there is little understanding of how this will be properly managed or controlled.

The Directors of Southbeats (in the corporate guise of SBE) have shown over the last three years they do not have the ability to control crime and disorder. SBE may have introduced a management company in Proud, but ultimately, they carry overall responsibility for any mishap at this event. This application should be seen in light of the police commentary of how they ran the three previous events in terms of preventing crime and disorder.

Corporate structure

We are most concerned at the corporate structure and GDPR processes with the applicant SBE Live Limited. Whilst we are not experts at whether a criminal offence is taking place, these need to be reviewed in light of this application.

The application has been made in the name SBE Live Limited, company number 11065875 with the following directors: Craig Robert Barrett and Maximillian David Weston. SBE Live was incorporated on November 2017 and has yet to submit any accounts.

Southbeats has been running in 2016 and 2017 at Quex Park and in 2018 in Port Lymgne. When it was running at Quex Park in 2017, the corporate body was South Events Limited.

South Events Ltd, company number 10018544, incorporated 22 February 2016 has the following directors Daniel Albert Walker and Max Weston. South Events Limited's last filed accounts (28th Feb 2018) show that it has a negative net worth of £26,995 – and it can be argued that it is trading insolvently.

SBE Live Limited and South Events Limited have a joint director in Mr Weston. However, they are separate legal entities with different shareholders and this must be treated as such. If South Events Limited ran Southbeats in 2017 (we do not know if this was the case in 2016) then at some stage they must have owned the title and intellectual property (IP) to Southbeats as a name along with the obligations and liabilities etc. As SBE Events Limited is fronting this application is it using the IP of another company and if so what is the agreement for this?

We are concerned that Mr Weston is setting up trading companies to front each event and then if there is a problem, he will close them and move on. If this is the case have all the appropriate legal rights been passed to each trading venture? Is this activity a criminal offence if done knowingly?

The questions we would like to raise to ensure criminal offence is not taking place are:-

- a) Are the directors knowingly trading with insufficient capital – a full business plan should be provided along with an understanding of the corporate structures behind the 2019 event and the relationship with the events in 2016, 17 and 18.
- b) The trading name of the applicant, SBE Live Limited, company number and address is nowhere on the Southbeats website. This breaks the law under the Companies (Trading Disclosures) Regulations 2008 which specifically states that company names and details must be made on a website.

Southbeats has presold and continues to sell tickets through a website called www.fatsoma.com. When buying a ticket the following prompt is received before putting in credit card details:-

*These **tickets** are for **Southbeats Festival 2019**. **Tickets** are purchased directly from **southbeats festival, Dane John Works, Gordon Road, CT1 3PP, Canterbury**. This payment will show up on your card statement as **southbeats festival**.*

*You're purchasing tickets for **Southbeats Festival 2019** by **Southbeats Festival**. By purchasing you accept the terms of service and have read the privacy policy.*

Southbeats Festival is not a corporate entity and the application for this event is under the name of SBE Live Limited.

As SBE Live Limited have presold tickets to the event but not under their name, how do the buyers of these tickets know whom they have contracted with? Are they trading fraudulently and therefore committing a criminal offence?

Due to the inconsistent corporate structures, we also believe that SBE Live Limited could be breaking GDPR Laws which in certain circumstances is a criminal offence. The reason of this belief is that any data that has been collected by South Events Limited cannot be given to another corporate structure for their marketing. If SBE Live Limited have used South Events Limited's marketing list then this will be a breach of GDPR laws. This legal breach needs to be investigated.

We also note that the Director Maximilian David Weston was a director of another events company Beats Events Limited, which was incorporated on 3 Feb 2017 and then dissolved on 9 April 2019 before submitting any accounts. We do not know the relationship of this company with SBE Live Limited and South Events Limited and the Southbeats festival, and this should be ascertained along with the corporate entities who ran Southbeats in 2016, 2017 and 2018.

We do note that Mr Weston should have advised Companies House of his linked directorships along with any other companies he may own because these do not come up on the Companies House register. We are not sure if this is a criminal offence.

Promotion of public safety

Suitability of the site

The top of the North Downs is characterised by heavy clay which will bog down vehicles very quickly in wet weather. The site is also extremely exposed in the event of rain and strong winds. As a parish we have helped the Wrotham Steam Rally with straw and tractors to tow stranded vehicles after rain storms.

The two car parks onto the A20 are relatively flat and can take some rain before becoming impassable. However, the topography for the Terry's Lodge Road car park and access is completely unsuitable and dangerous for large scale traffic due the following:-

- i) The entrance road is a minor road with restricted width in places which will cause problems with large coaches turning into the gateways.
- ii) There is currently only one gateway onto Terry's Lodge Road.
- iii) There is a footpath across the site from Terry's Lodge Road to the A20 which will have to be closed.
- iv) The kerb height on Terry's Lodge Road will cause problems with low slung vehicles.
- v) The slopes on the field are significant and will cause problems with parking efficiently (thus reducing car numbers). In wet weather, vehicles will not be able to get back up the slope.
- vi) Government Parking guides (and the Purple Book) state for safety reasons, cars must always be parked facing outwards to prevent reversing into crowds. However, such is the slope on Terry's Lodge Road, that with even a small amount of rain any car facing uphill that has front wheel drive, will not be able to exit the car park because all their weight will be on their rear wheel, meaning the front wheel will have no traction. The Purple Guide specifically mentions that cars should not reverse in car parks due to the risk to pedestrians (especially at night).
- vii) The entrance slope at the existing gateway has a reverse camber falling into the hill which will be dangerous for the 92 seat coaches proposed by the organisers.
- viii) The proposed entrance that does not currently exist (GV2) has a significant fall in a short space – see attached cross sections taken from Google Earth Pro to show the profile of the two gates and other sections across the car park.
- ix) Large scale double decker coaches will require flat ground for safety – there is very little of this on the site which would indicate that they will have to park along the road which could cause blockages.
- x) Some of the slope sizes are so steep it will not be possible to park cars or other vehicles on them, which will reduce the total parking area even further.
- xi) The car parking for the camp site is next to the camp site. The Purple Guide specifically recommends that this should not happen to stop:
 - cruising or joyriding,
 - car fires
 - runaway cars.

We highly recommend that the licensing committee and officers make a site visit so that they can see this detail for themselves. This is particularly relevant with the scale of the slopes, especially for the buses coming into the car park.

Emergency access

The event will create significant traffic jams (see below) and this will cause problems with emergency services. If there is a problem in the Terry's Lodge car park (such as a fire) and it has been wet, due to the scale of the slopes a fire engine could have significant problems accessing parts of the site. An ambulance will also have the same problems.

Exit points from the main stage to the buses and car parking

The attached map shows that the proposed exit from the main stage to the coaches and cars is 1,458 meters (nearly a mile!) and if another way is sent via the campsite this would be just over a kilometre (1,048 mtrs).

There are some serious squeeze points to the proposed route – especially during the end of the concert. One of the largest concerns is the route along the side of the wood that stretches for approximately 350 metres. This is too narrow to take the volume of people and will be fenced on both sides causing no relief in the case of problems. If there was a stampede or someone fell seriously ill they will not be able to be reached by emergency services. Furthermore, should the fence along the edge of the motorway be breached, the drop is severe and would cause significant injury or death to anyone falling down the slope.

At the end of the evening when people finally arrive at the car park and coaches, they will be crossing the path of the exiting vehicles in the dark which will also be dangerous.

M20 exit

The M20 exit (2a) is met via a long, blind, rising left hand bend which means that the exit point comes up unexpectedly. There is then only c.400 meters from the exit before you are at the A20 roundabout and the entrance to the site. This is an extremely short stretch of road and will become jammed very quickly when the festival fills up. The jam will stretch back on the M20 which has short visibility due to the bend and we believe this is a serious traffic hazard and has a high potential to cause a car crash.

Pedestrian bridges over M20

There are two pedestrian bridges over the M20 with high drops onto the motorway below. One bridge comes out on the festival site and will need to be closed as it accesses a bridlepath going across the site.

The other bridge is halfway down Wrotham hill and we are extremely concerned that late at night festival goers from Wrotham and Borough Green will be crossing a high bridge, whilst intoxicated, in an area with no lighting.

Walking and cycling dangers

For locals living in Wrotham, Borough Green, West Kingsdown and Stansted, who want to go to the festival, the best way to avoid all the traffic will be to walk or take a bicycle. Wrotham Hill and the

A20 along the festival site have no public lighting. The numbers of pedestrians and cyclists spilling onto dark roads and lanes and going down Wrotham Hill will be dangerous and add to the traffic jams.

Weather

The Wrotham site is extremely exposed on the top of the North Downs at over 200 mtrs above sea level with nothing to protect the site against winds coming from the North all the way round to the West - 270 degrees. The West to North aspect (90 degrees) has some protection from the woods along this side. As locals will attest, serious wind or storms normally come from the South West which will be straight into the face of the main stage. Horizontal rain and electric PA equipment do not make for good bedfellows. The site could become extremely dangerous due to its exposed position on the top of the North Downs.

Landscape

The farmland on this site is characterised by extremely heavy clay. This clay turns into a quagmire at the slightest hint of any serious rain – the reason why St Clere have put a tarmacked road into the site. Stansted residents have on numerous occasions had to help vehicles out of the field and provide emergency straw to provide grip for cars and lorries etc.

Once the land becomes waterlogged and muddy, vehicle access (both in and out) and most importantly emergency access will be impeded.

The prevention of public nuisance

Traffic

We have significant disquiet about the information provided in the traffic plan. There are huge gaps and inconsistencies in the data and this leads us to believe the organisers do not have the skills or understanding required to run a successful traffic plan at this site without causing chaos. SBE created significant traffic problems in previous incarnations of Southbeats. Proud Events have specialised in promoting festivals in urban areas, not large-scale rural events with camping over a number of days.

We will now address where we see the challenges in the traffic plan and why it will cause a public nuisance due to jams and inability of festival goers to meet their connections.

Southbeats travel assumptions.

The Southbeats application is particularly hazy on where the traffic will come from and provides the following chart

| | Vehicles | People |
|---------------------------|----------|-------------|
| Weekend parking \ camping | 500 cars | 2500 people |
| Day parking | 550 cars | 1500 people |
| Production parking - TBC | | |
| Coach | 50 | |
| Shuttles | 90 | |
| Taxi and drop off | | TBC |
| Total | | 12,000 |

Although the application is for 14,999 people, the travel plan only goes up to 12,000 people – a shortfall of around 25% on the number that could appear each day. Any traffic plan must take into account the total figure allowed under the licence.

Assuming 14,999 people come to the festival daily (including staff) then using Southbeat's data we can extrapolate the following

Camping: 500 cars – 2,500 people – equating to 5 people per car

Day parking: 550 cars – 1,500 people – equating to 3 people per car

50 coaches: assuming 92 seat coaches 4,600 – 92 seat coaches are what Southbeats have been advising residents they will use.

Total 8,600

Note if the coaches are not 92 seaters then this figure will come down commensurately or the coach numbers will need to increase.

Note that Purple Guides state camping is in the region of 2 to 2.4 per tent. We would anticipate that a car arriving for camping with all its luggage will have 2-3 people not five.

These figures seem to be highly suspect, but using Southbeats calculations this would indicate 6,399 people (including staff and concessionaires) will be coming via shuttle buses or yet to be defined extra car numbers.

The allocation of how people will arrive is at odds with Green Festivals (a website that promotes making festivals green) which has surveyed eight festivals and shown that on average 60% of festival traffic comes by car. (<https://www.agreenerfestival.com/traffic-congestion-travel/>) Assuming 14,999 capacity and 60% come by car with 3.0 people per car, this would equate to 3,000 cars.

TMBC officers with knowledge of other festivals within the borough (such as at the Hop Farm) should have a realistic view of the true split between coaches and cars.

The issue is whether the three car parks can successfully accommodate all of these vehicles.

The Purple Guide has this to say on planning car parking capacities: -

| | |
|-----------------------|--------------------------------------|
| Average car occupancy | Car parking per hectare - Greenfield |
| 2.2 - 3.5 | 320-440 |

The three car parking sites have the following sizes (see appendix with measurements taken from Google Earth Pro):-

- Terry's Lodge Road 4.841 hectares
- Campsite 0.94 hectares
- Main entrance – 0.37 hectares

Using the Purple Guide data:-

| | Hectares | Lower car range | Higher car range | People at lower rate - 3 per car | People at higher rate - 3 per car |
|--------------------|-------------|-----------------|------------------|----------------------------------|-----------------------------------|
| Terrys Lodge Road | 4.81 | 1,538 | 2,115 | 4,615 | 6,345 |
| Camp site | 0.94 | 302 | 415 | 905 | 1,244 |
| Main Entrance | 0.37 | 118 | 162 | 354 | 487 |
| Total | 6.12 | 1,958 | 2,692 | 5,874 | 8,077 |
| Estimate car needs | | 3,000 | 3,000 | | |
| Shortfall | | 1,042 | 308 | | |

For the purposes of calculation, the Terry's Lodge site should actually be below the lower car range because this assumes no coaches on the Terry's Lodge car park, and also the site has significant slopes so it will be difficult to park closely.

Thus, it can be seen that even the most basic calculations show a shortfall on car parking of over 1,000 cars. This is the equivalent to needing parking of well over 3 extra hectares of parking.

It is interesting to note that Southbeats recognise that lack of car parking may be an issue when they state in the event plan page 38 "if parking reaches its capacity a small provision of offsite parking will be explored by Proud Events and a shuttle service to accommodate additional parking of customers on the site".

Three hectares is not a small amount and therefore we can only conclude that the 1,000 extra cars will have nowhere to go and will look to park wherever suits. This will create a significant public nuisance – especially for the residents of Stansted who are closest to the site.

Car parking charges

The organisers are planning to charge for car parking. Our extensive experience of events on this site (car boot sales etc) is that as soon as there is a charge for parking, people try and avoid it. Indeed, we have constantly asked TMBC to provide wardens during car boot fairs at this site due to this problem. As there are minimal yellow lines, people believe they can park anywhere. If Wrotham Hill is being guarded then Stansted is the obvious place for people to park their cars and then walk to the site. Stansted's road network is characterised by narrow single track lanes and cannot take the excess capacity that we have identified, and no allowance has been made for this.

A significant public nuisance will be caused by abandoned cars within the parish.

If Stansted does become part of the parking solution, there will be a serious public danger late at night with people walking in the dark down single track roads, and also cars using Stansted as a rat run to get down to the M20/M26 avoiding Wrotham Hill.

Traffic Jams

Entering the site on Friday afternoon and leaving on Monday Morning

At commuting times, there is already significant traffic build up on the A20 coming up and down Wrotham Hill. On most weekdays it can tail back from the bottom of Wrotham Hill to the M20 junction. On the occasions when there is gridlock on the A20 and A227 coming off the North Downs due to problems on the M26 and M20, Stansted Parish is used as a rat run between the two roads as people try to get round the delays. This festival will mimic the problems we have when the M20 or M26 are blocked and this will cause significant disruption to Stansted's transport infrastructure.

As Stansted is characterised by single track roads, speeding cars will also be dangerous.

Leaving the site in the evening when the music stops

The Purple Guide has this to say about festival sites:-

You also need to consider the exit capacity. ...for events with a fixed end (concerts for example) when everyone tries to leave at the same time, you will need to consider an exit plan – and this may mean, for example, parking fewer cars in a temporary car park than it has space to accommodate.

One of our biggest concerns is the traffic jams that will be created late at night in a dark country environment. These will start at the car park entrance as crowds of people congregate to get on buses whilst the traffic is also trying to exit.

Once onto Terry's Lodge Road there is only a short distance before a junction is reached to the A20 causing significant tailbacks into the car park. Those turning left down Terry's Lodge Road will be going off the North Downs down extremely steep unprotected roads. Once on the A20 cars will be directed up the A20 to the Swanley Roundabout which will cause significant tailbacks.

Traffic lights

It is proposed that traffic lights are put at the entrance to Stansted. This will cause delays on the A20 and a significant nuisance to the residents of Stansted and Fairseat.

Bus Parking

The organisers have advised that they are looking to use 92 seat coaches to come to the event. The weight of a fully loaded coach varies between 13 and 18 tonnes and they do not have four-wheel drive. We do not believe that it is either safe or practical for a double decker coach to go into the Terry's Lodge Road parking site due to the scale of the slope on entry and exit. Furthermore, the slope on entry has a reverse camber which could cause a risk of the coach falling over.

Unless the exit slope is built up more gradually and proper hard core put down, we do not believe coaches will have sufficient power when fully loaded to exit.

On this basis, the drivers when they arrive at the car park are likely to refuse to enter the car park and as a result the only place for them to park will be along Terry's Lodge Road facing the wrong way to exit the A20. Terry's Lodge Road is a designated C road and in places no more than 16 ft wide which will cause pinch points and significant jams to cars and other buses using the road if it is blocked by up to 50 buses (not including the shuttle buses).

This lack of foresight on the coach parking will be dangerous and cause significant public nuisance.

Taxi capacity

TMBC will know the number of licensed taxis available within a suitable distance of the site. There are just enough to cover the existing hospitality industry within the Borough – especially in the evening. Indeed, if taxis are not booked in advance of 11.00 pm then the wait in Stansted can be up to two hours for a local service. Southbeats will swamp the local taxi capacity causing two public nuisances: -

- Inability of the local population to get home from local rate paying hospitality venues
- Inability of festival goers to leave the site at a reasonable hour leading to congregating youths who are tired and drunk which will potentially result in disorder.

At previous Southbeats festivals there was not sufficient taxi capacity and this caused people to walk to their nearest conurbations. No allowance has been made for how festival goers who arrive in Borough Green will react when they find they cannot get taxis or a train until the next morning. This is both dangerous and will cause a significant public nuisance.

Light pollution

In the Purple Guide they state that for safety purposes festivals should have sufficient lighting – *“All parts of an outdoor venue should be provided with suitable levels of artificial light, unless they are only to be used in adequate daylight. Careful consideration should be given to the lighting of the first-aid post, information area/marquees and pedestrian access to car parks, car park areas, toilets, and access routes to public highways”*

The top of Wrotham Hill is a “dark space”, made darker by the woods within the site and the nature of the topography. There is no street lighting near the venue.

To make the car parks and camp sites safe, the organisers will need to create a significant lighting system. There has been no allowance for the public nuisance created by the light pollution and generator noise – especially for the cottages next to the camping and Terry’s Lodge Road car parking.

Noise

We accept that any festival by its nature will create noise. However, the time frame that the licence is taking place will create a significant nuisance to the community. The following chart shows how much time the amplified music will impose on the community:

| Upto | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 |
|----------|--------------------|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|
| Friday | | | | | | | | | | | | | | | | | | | | | | | | |
| Saturday | | | | | | | | | | | | | | | | | | | | | | | | |
| Sunday | | | | | | | | | | | | | | | | | | | | | | | | |
| Monday | | | | | | | | | | | | | | | | | | | | | | | | |
| | No amplified music | | | | | | | | | | | | | | | | | | | | | | | |
| | Amplified music | | | | | | | | | | | | | | | | | | | | | | | |

We note that no application has been made for amplified music on the Thursday. This will leave little time for sound checks etc when the festival starts.

Having amplified music until 2.00 each evening will cause problems with lack of sleep and is both a danger and a public nuisance.

Bar timings

The applicant has requested the bars stay open until 3.00 a.m. each morning. This is far too late and will encourage people to stay on site, keep making noise, and cause a nuisance as well as create a public risk.

Effect on local businesses

Stansted has four hospitality businesses within the parish – The Hilltop Hotel, Thriftwood Campsite, The Black Horse and The Black Barn at Court Lodge. All of these rely on their primary business at a weekend. The Southbeats festival will effectively close these businesses down during the period it operates which will deprive them of essential income. Furthermore, their customers who come will be significantly inconvenienced by the jams and delay to get them to the site.

The protection of children from harm

School bus to Tonbridge

The school bus goes from Stansted, with a stop opposite the old Horse and Groom and then proceeds down Terry's Lodge Road. This happens at 8.00 a.m. in the morning and c.4.00 p.m. in the afternoon. If coaches are parked along Terry's Lodge Road the school bus will not be able to pass and will exacerbate the traffic jams. Also if there are significant jams on Friday afternoon and Monday morning, how will parents be able to co-ordinate picking up their children? No allowance has been made for the school bus in this application.

Stansted School

At the beginning of September Stansted School is re-opening as a school specialising in educating primary school children with Autism. Routine and structure are extremely important to the well being of Autistic children. Children will be delivered by taxi and parents using the same drivers on the same route at the same time each day to provide this routine. We are most concerned that the traffic jams and noise generated by Southbeats on Friday afternoon and Monday morning will have an impact on the children when arriving and leaving their new school.

Drugs and loitering outside the site

The nature of the site means that it is easy to walk to and from the surrounding villages of Wrotham, Stansted, West Kingsdown and Borough Green. Underage children will not be able to get into the event, but they will be able to get close enough that they can listen to and enjoy the music. This will include the car park on the top of the North Downs opposite the site. We are concerned that there will be no one to watch these minors should they try and get into the festival illegally and succumb to temptations offered outside the venue.

In the event of agreeing this application

Should TMBC be minded to grant this application, we would request the following:-

- a) Confirmation that TMBC officers have done proper due diligence on the corporate structure and Directors of SBE Live to ensure the law is not being broken corporately or with GDPR.
- b) A full report of their findings to be provided to the licensing committee

The following restrictions added to the licence:

The licence should only be applicable for one year.

Reason: To see how the festival runs and not let it have an automatic right to a further year without having to go through formal approval having seen how the first year ran.

Reduce the licence size to maximum 12,000 people

All the calculations Southbeats have provided are on the basis of 12,000 people, but they have applied for 14,999 people. We have shown that even with 12,000 people their calculations are flawed, but with 14,999, i.e. a 25% increase on this number, they really would be unsustainable. This figure is also in line with the previous Southbeats events.

Length of the festival

For 2019 only run the festival on Saturday

Reason: Reduce the congestion during Friday and Monday morning which are key commuting times. Also reduce the evening congestion down to one night not three. This will also allow everybody to understand the impact (noise, traffic etc) of a festival of this size. This is also in line with previous Southbeats events.

This will also protect the children of Stansted School and prevent negative impact on their routine.

Removal of camping

Reason: As the festival will only be for one day there is no need for camping. Furthermore, this will increase the car parking and provide more suitable and level ground for vehicles where the camp site currently sits.

Times for amplified music

All live and amplified music to cease at 22:30

Reason: For the protection of the neighbours within a country setting. This is also the latest that will let people get to trains from Borough Green and Swanley under the current time table. (see below) As the Southeast travel plan relies on a significant percentage of the people coming by shuttle bus

from the train stations, it is critical the ability to catch the last train should be factored into the timings for the festival.

Should the festival go over the three days then the music stopped as follows:-

Friday and Saturday 22:30

Sunday: 21:30

Reason, to make this in line with the ability to catch the last trains from Borough Green and Swanley.

Calculations outlined below:-

Bus to catch last train from Swanley

| To London | Friday | Saturday | Sunday |
|------------------------------------|--------|----------|--------|
| Last train from Swanley | 23:53 | 23:53 | 23:13 |
| Last bus leaves to get to Sdwanley | 22:51 | 22:51 | 22:11 |
| Music stops | 22:30 | 10:30 | 21:30 |

The timing for the last bus is based on the following assumptions: -

Travel time to Swanley without congestion (Based on Google maps) 17 minutes, walk from main stage to the bus 20 minutes, 15 minutes congestion, wait at station 10 minutes. Total 1 hour 2 minutes.

Bus to Borough Green

| | | | |
|---|-------|-------|-------|
| Last train from Borough Green going to Kent | 23:40 | 23:40 | 23:07 |
| Last bus leaves to get to Borough Green | 22:48 | 23:48 | 22:15 |
| Music stops | 22:30 | 22:30 | 21:30 |

The timing for the last bus is based on the following assumptions: -

Travel time to Borough Green without congestion (Based on Google maps) 7 minutes (note this assumes the buses can turn right), walk from main stage to the bus 20 minutes, 15 minutes congestion going down Wrotham Hill, wait at station 10 minutes. Total time 52 minutes.

All bars close at 10:30

Reason: With the music stopping at 10:30, the closure of bars at the same time will ensure that people do not linger on the premises to have "one last drink". This will speed up the removal of people from the site

There should be no late-night bars or music, to protect the neighbours and reduce the risk of violence

Maximum level for amplified music within the Parish

A maximum decibel level needs to be agreed along the Stansted Parish boundary – this level should be as per the maximum amount advised in the noise plan:-

| Location | Free field Receiver level (dBA) |
|---------------------|---------------------------------|
| Labour In Vain Rd | 60 |
| Old Coach Road | 63 |
| Plaxdale Green Road | 58 |

A monitor should be placed at each of these roads agreed with TMBC. The average should be based on a rolling five minute average not 15 minutes submitted in the proposal.

Having an agreed level will allow the parish to provide their own independent monitoring during the festival that can be managed accordingly.

TMBC to have an environmental officer available on site at all times – this to be paid for by the festival.

An agreed escalation plan to be implemented in the case of non-compliance on the noise levels with the ultimate sanction turning off all amplified noise. Any music that is created electronically to be put through a sound limiter at the agreed levels, this sound limiter should be under the control of TMBC officers (or their agents)

Reason: for the protection of the neighbours. With an agreed level we can then ensure that the festival stays within its levels and appropriate action can be taken on the day if this does not happen.

No amplified music \ PAs in the campsite

Reason: To protect the neighbours and also the cottages next to the camp site.

Provision of traffic wardens – paid for by the festival

We have shown that the site does not have sufficient parking for the number of cars that could be expected. Traffic wardens with the appropriate authority, by means of appropriate local by-laws, shall manage any illegal parking.

Reason: To ensure that the roads do not get congested and also to make sure there is sufficient access for emergency services.

Management of traffic having access to Stansted

Stansted has the potential to be clogged up with parking and rat running. A process needs to be agreed – in conjunction with the Parish – on how this will be managed and the resources (paid for by the festival) to ensure that this system operates successfully. This plan is to take into account how the four hospitality businesses within Stansted can provide easy access for their clients during the event so that their trade is not affected by the festival.

Reason: to stop Stansted Parish getting clogged up and being used as a rat run.

Coach company approval

The event shall not proceed until written confirmation has been provided by all the coach companies that are contracted by the organisers, that they have viewed and accept the arrangements for on-site parking regardless of the weather conditions.

Reason: To ensure that all coach drivers are aware of the dangerous and tricky nature of the site and they do not refuse to enter the site on the day and therefore cause a traffic nuisance.

All appropriate planning permissions are in place before commencement of the festival

Reason: The application will break two planning regulations (see below) and these need to be in place before the event takes place.

Planning

Should the licence be agreed, we would like to point out that the application requires formal planning permission in two areas:-

Creating a new entrance onto a C road at Terry's Lodge Road

Currently the St Clere Estate has only one access point onto Terry's Lodge Road which is a designated C class road. The application for bus and car parking shows a second entrance onto Terry's Lodge Road. This cannot be created until a full planning application has been submitted and agreed.

Overuse of the 28 day rule

The 28 day rule allows events to take place on farmland to a maximum of 28 days in one calendar year. Planning law specifically states that 28 days *include* the setting up and breaking down of an event. The St Clere Estate has used the site in 2019 as follows:-

- a) Set up, running and break down of Spartan Race – 14 days
- b) Wrotham Steam Rally – yet to run but every year it takes 5 days – Wednesday to Monday
- c) Proposed set up and closure for Southbeats – 13th – 26th Sep (14 days)

Total usage of the site in 2019 - 33 days. This requires formal planning for change of use on the site.

We request that TMBC Licensing Committee advise the planning department of the requirements of these two planning applications. Planning approval should be a prerequisite for letting this festival go ahead.

Stansted concerns about the organisation

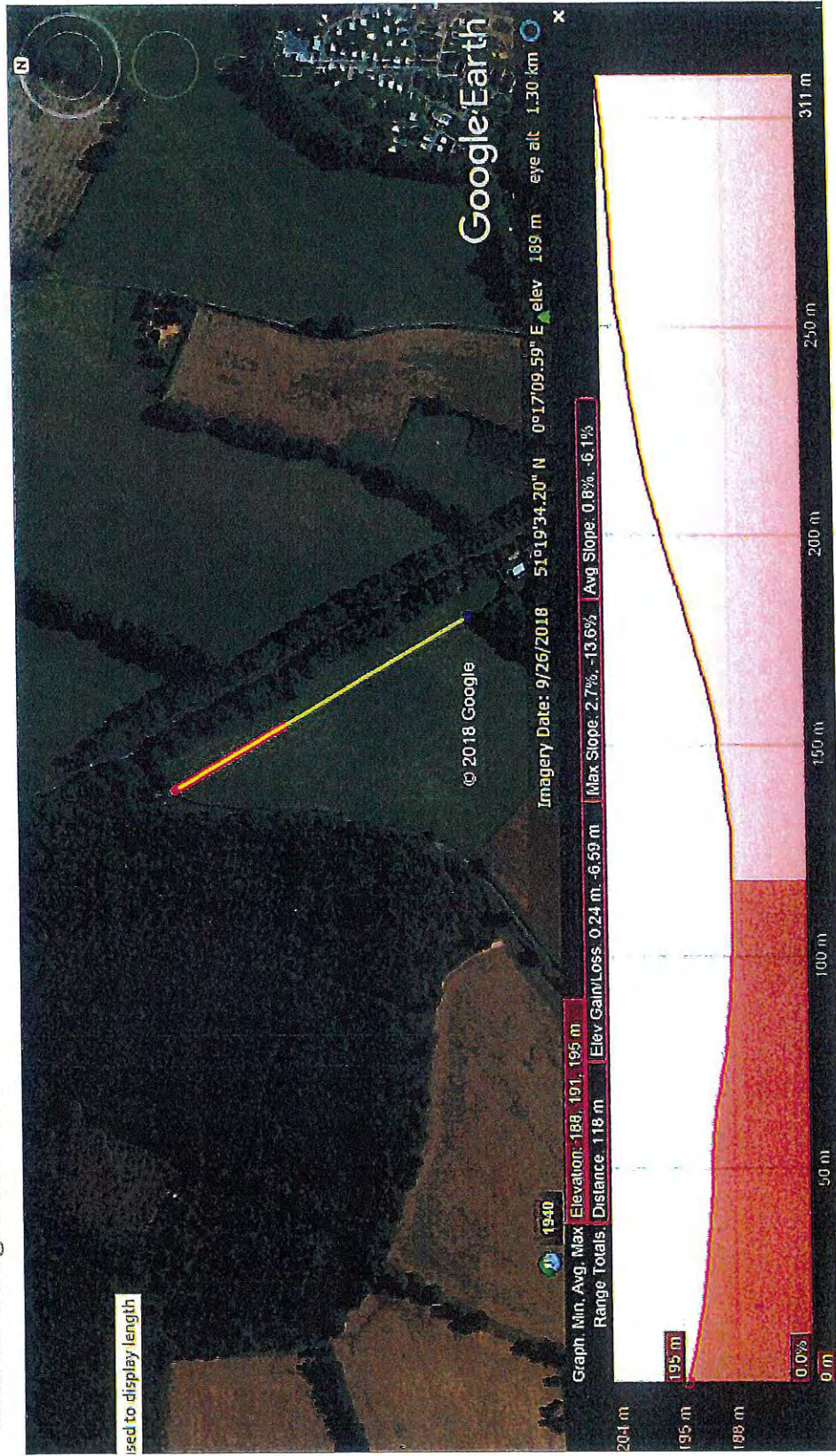
Based on the documentation provided by the applicant, their previous history and corporate structure, we have significant concerns on their overall ability to deliver this event successfully:-

- a) The data and assumptions are incorrect, hazy or incomplete. Furthermore, they rely on future plans which may or may not appear.
- b) The Directors of Southbeats have a three year history of running dangerous and antisocial events. Indeed they were fined by the HSE one year due to dangers on site.
<https://www.kentonline.co.uk/thanet/news/council-prosecute-event-organiser-135480/>
- c) The corporate structure behind Southbeats is difficult to ascertain and we believe they are currently breaking the law in the way they have pre-sold their tickets by not including their full corporate details in breach of clause 6 and 7 of the Companies (Trading Disclosures) Regulations 2008
- d) Neither the applicants nor their management organisation are experienced in running a three day event with camping in a country area that has restricted access and that is not close to public transport or an urban conurbation.
- e) They have made no effort to engage with Stansted Parish Council, to allay or address our concerns. We believe this is also true of the other local parish councils.
- f) They claim to have consulted with the local population. This has involved a very limited door drop to selected houses within the parish. Wrotham has not been advised / consulted and the organisers specifically told a parishioner they did not intend to do this.

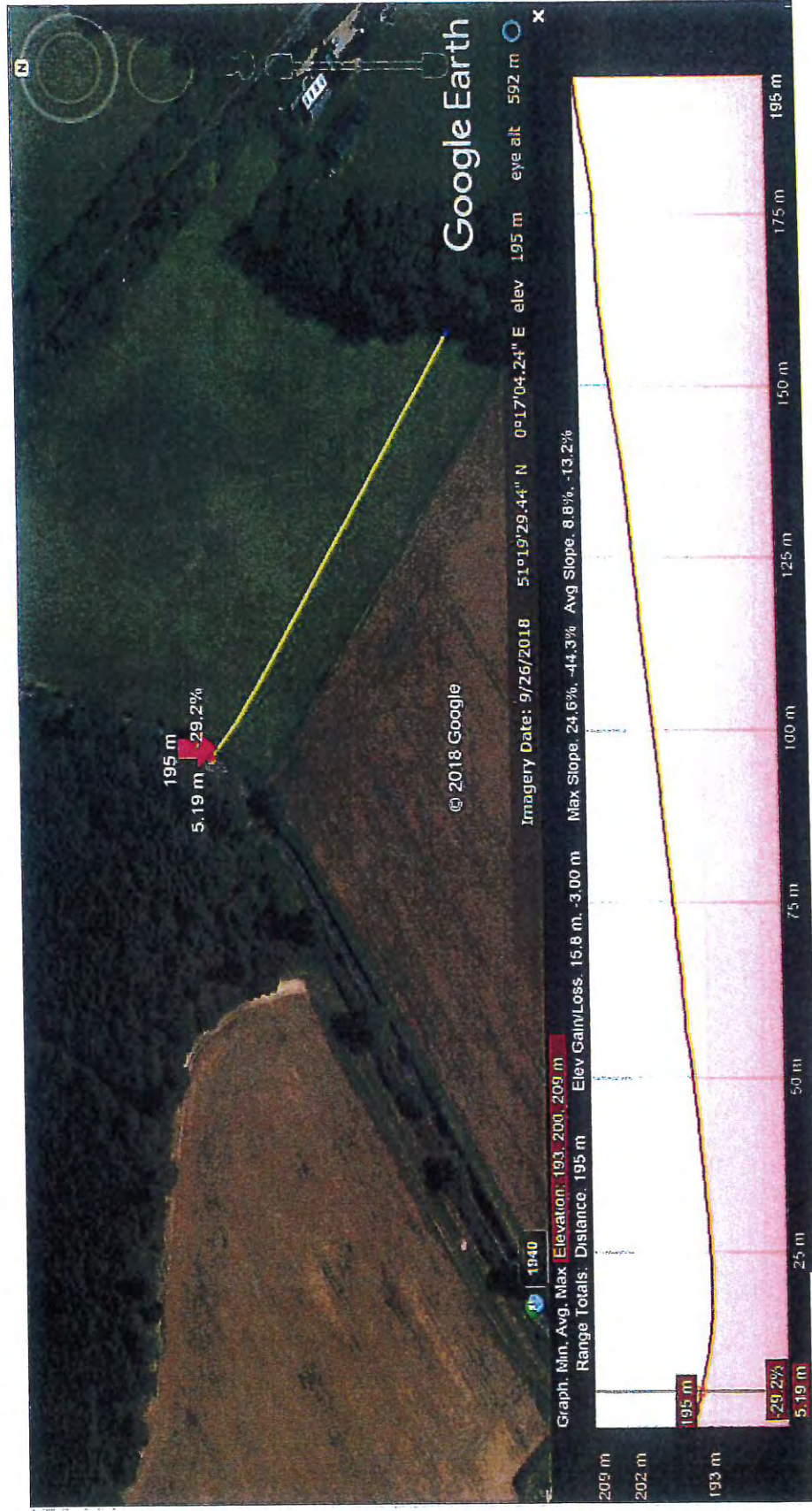
On the basis that the Licensing Committee needs to make a judgement based on what is currently before them, we contest that what has been provided is of such low quality that it does not address effectively the four key licensing objectives:-

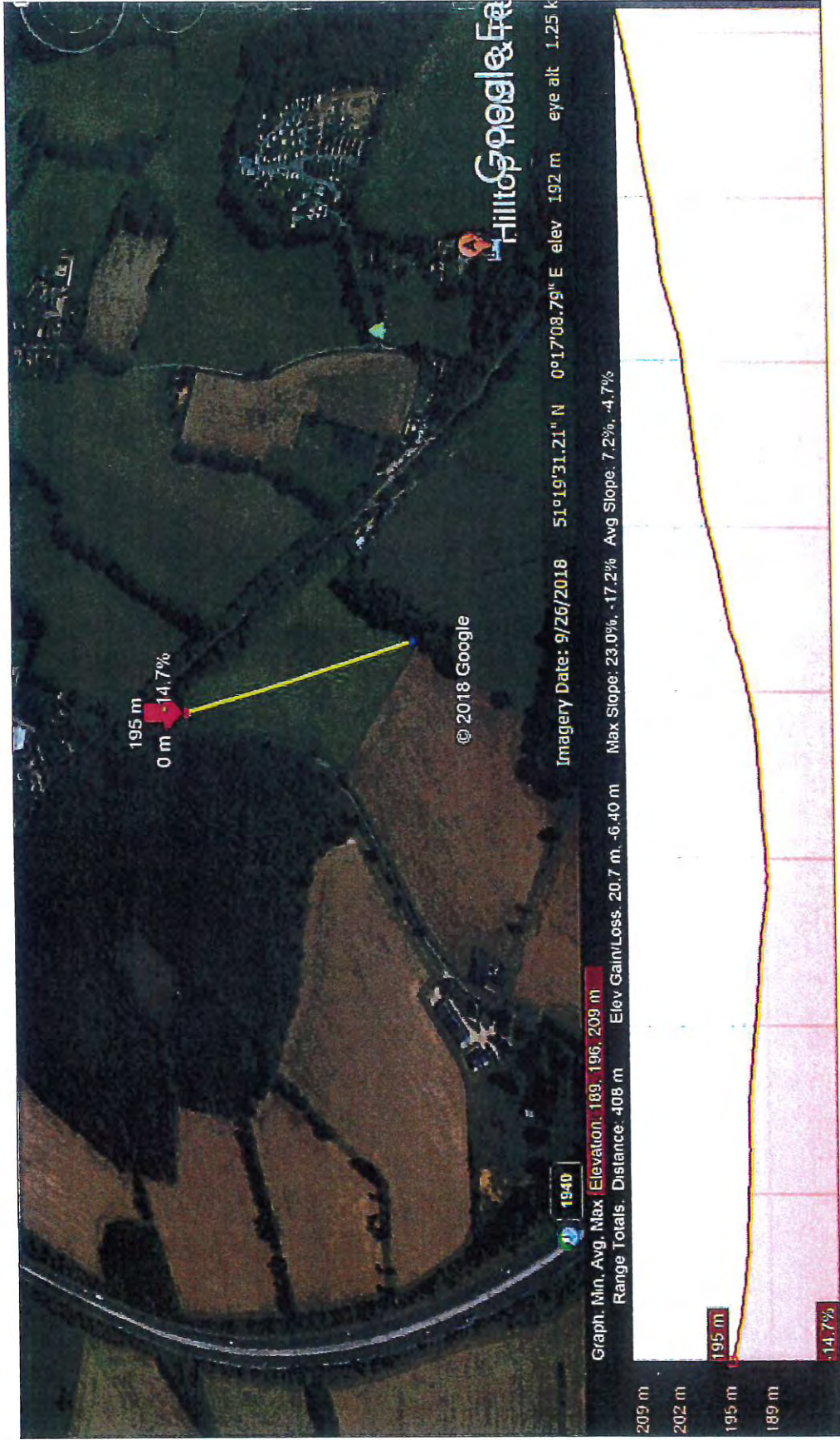
- The prevention of crime and disorder
- Promotion of public safety
- The prevention of public nuisance
- The protection of children from harm

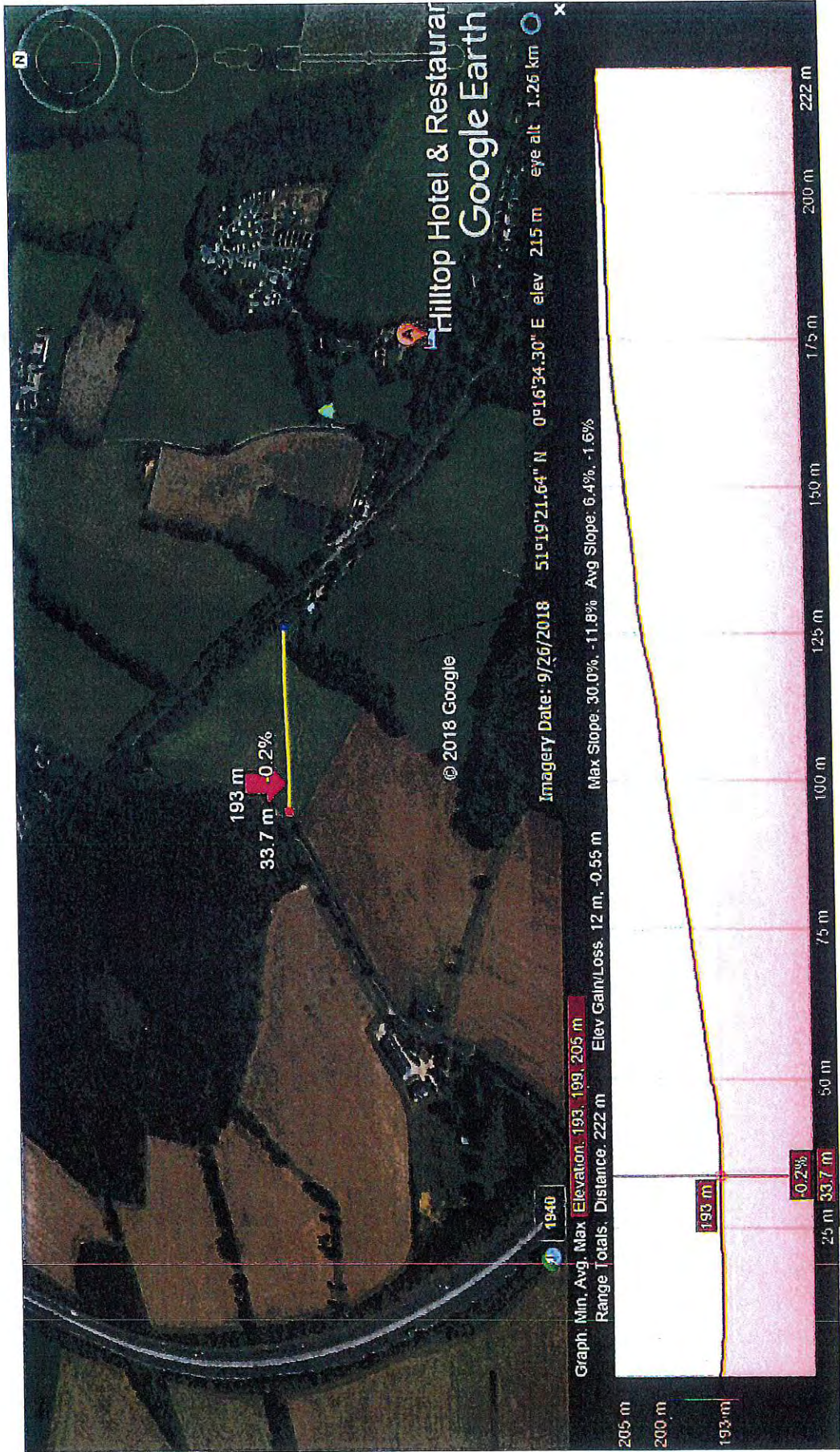
Site profile of Terry Lodge Road Car Park showing the varied terrain from the car park entrance to the other side of the field
— source Google Earth Pro

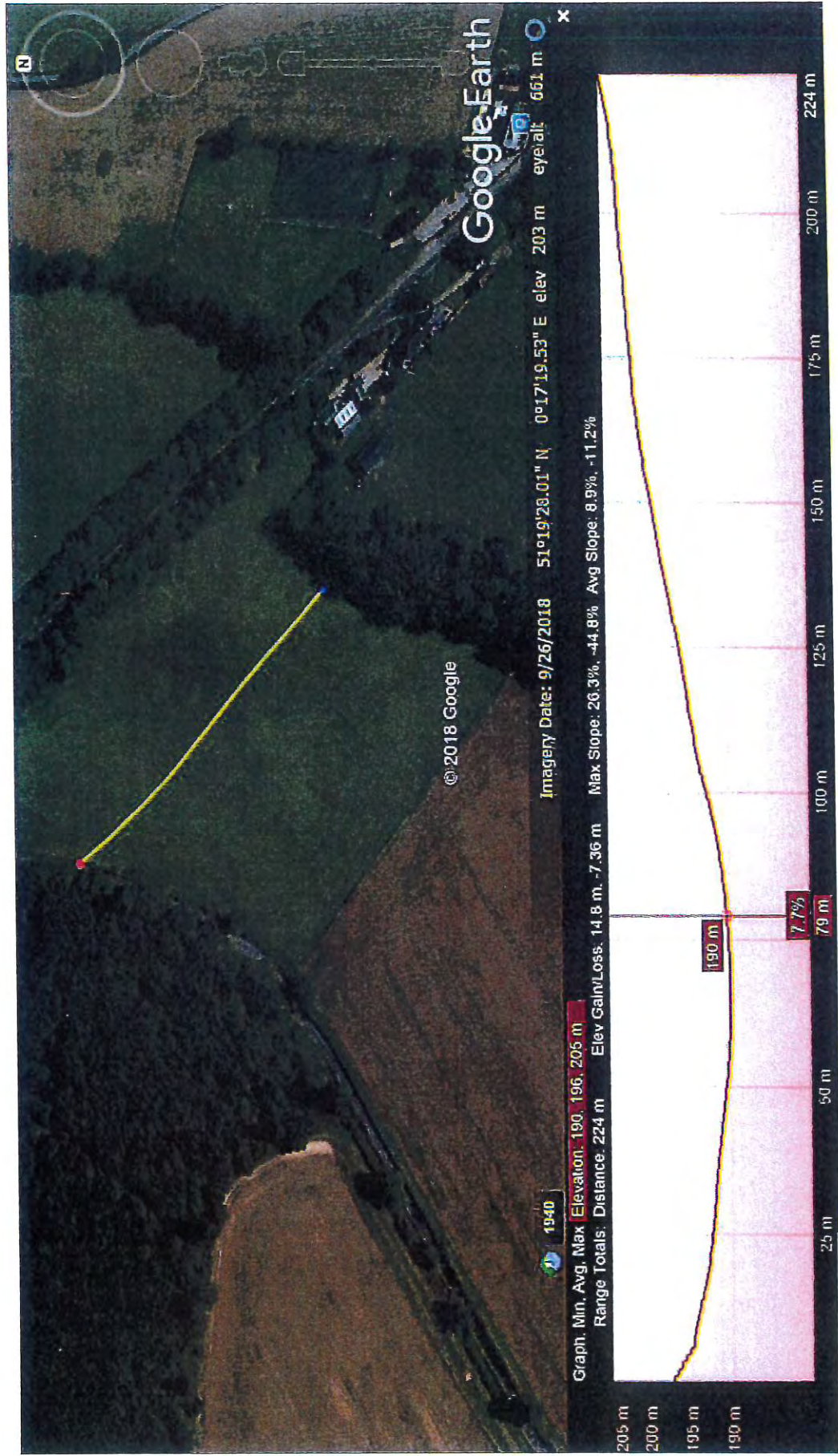


Site profile of Terry Lodge Road Car Park showing the varied terrain from the car park entrance to the other side of the field
— source Google Earth Pro



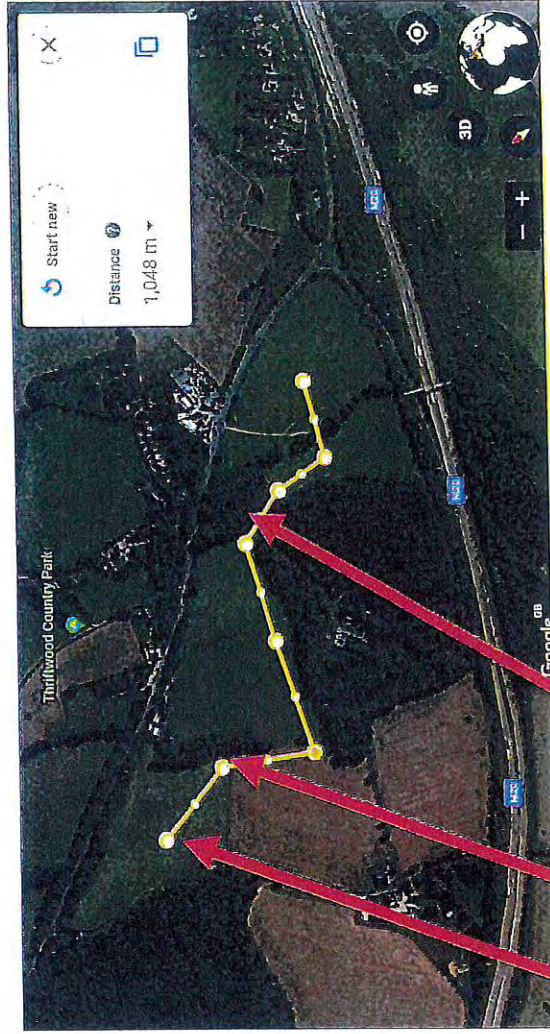




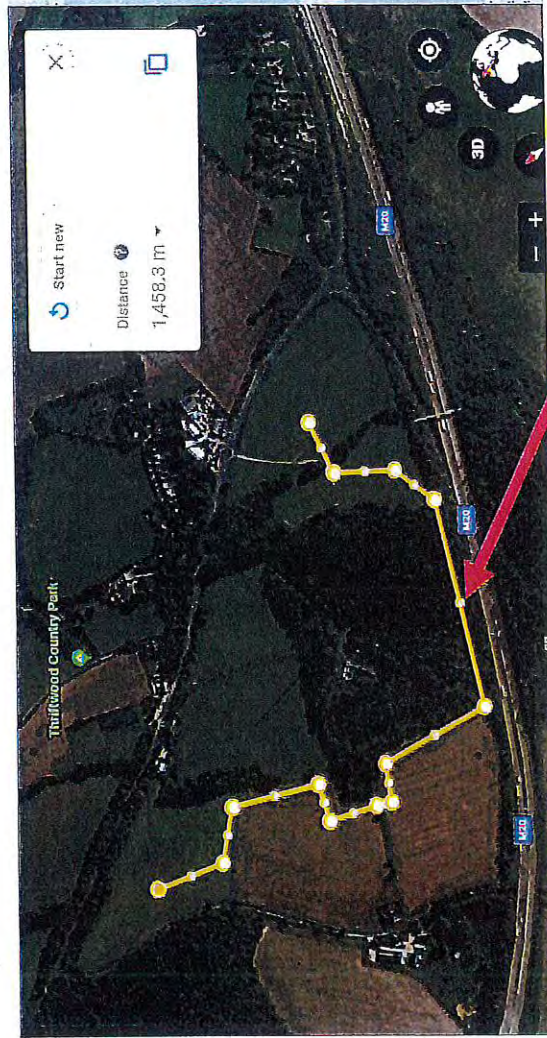


Distance from main stage to buses and car park

1,048 meters



1,458 meters



Squeeze points

Terry Lodge Car Park size



A20 camping car park size



A20 Site Parking size



[REDACTED]
Wrotham Hill Road
Wrotham
Sevenoaks Kent
TN15 7PX
[REDACTED]
[REDACTED]

TMBC
Licensing Services
Gibson Building
Gibson Drive
Kings Hill
West Malling
Kent ME19 4LZ

9th May 2019

To whom it may concern

I am writing to raise my concerns about the proposed South Beats Festival at Wings of the Morning

19/00461/PR
EM

I have lived here all my life and am very aware of the implications an event like this will have for both Public Nuisance and Public Safety on such a small site

The proposed site whilst adjacent to the A20 is not served by any regular buses nor is close to a railway station. Traffic generated by Brands Hatch leads to massive disruption of local roads despite the big turnout events being well managed and strong traffic measures in place. An event of this scale over three days on such a site with no permanent facilities will lead to serious congestion, access issues and trespass of other properties

Should the weather be poor the ingress and exit from the site will be impossible – there are no permanent trackways and just two small gates to the main site and one to the proposed car park area. It seems highly likely that there will be large numbers of people trying to access the venue over a long period of time via any means possible with only either the narrow local lanes or the

busy A20 to service their needs – the bottlenecks will lead to frustrations and inevitable create a Public Nuisance – both to local residents and the festival goers

Sited where the field is at the top of the hill will also create Noise Nuisance both from the venue and from the surrounding areas as festival goers arrive, try and park in the vicinity, leave the venue or just party where they manage to park up

I urge the council to bear the suitability of this site in mind and refuse the Licence Application

Thank you

Gillian Walton and Martin Coffin.



London Rd
Wrotham
TN15 7EB

7th May 2019

FOA Anthony Garnett

Tonbridge & Malling Licencing Department

Re: Southbeats Festival Licence application

I wish to make a representation to the above application by Southbeats to hold a festival from the 19th September for up to 5 days annually for 15,000 attendees.

My objections come under the following points:

The prevention of crime and disorder

- Due to the sheer scale of this proposed event and the demographic of the attendees, it is impossible to guarantee there will be no occurrences of crime or violence inside or outside the event.
- The organisers have said at the public meetings that the expected age for the attendees to be between 18 – 25 years and they plan to shuttle a proportion to local train stations such as Borough Green and Swanley. There will also be a significant number of attendees transiting through the local communities on foot who do not wish or can't afford a shuttle ticket as Borough Green is only 2 miles from the event. This gives rise to the potential of thousands of intoxicated young people in these areas, late at night with a high potential for disorder and vandalism. Kent Police resources are already under pressure and unlikely to be able to effectively control this.
- This type of event, based on Southbeats past record, attracts drug use and drug dealing. I'm sure the organisers will make some efforts to control this at the point of entry but given the huge volume of attendees in such a short period of time, up to 15,000 people in two hours, it's unlikely they will realistically be able to do any more than possibly catch a very small number.

Public safety

- M20 Motorway exit - I have studied the Road traffic plan submitted as part of the application and found it to be worryingly vague. The M20 motorway exit roundabout is situated immediately adjacent to the proposed event. With the proposed start time of 12:00 there is going to be a very large volume of vehicles attempting to gain access to and from the event in a short period of time. The vast majority travelling to Terrys Lodge Road, which is only $\frac{3}{4}$ of a mile (1.2km) from the M20 exit. We were informed at the public meeting that there would be no right turn into this road off the A20, which means every vehicle and coach will have to negotiate the M20 exit roundabout. This M20 exit is 7 miles from the M25 and it is 6 miles to the next exit the A228. This exit serves a very large area, including access to the A227/A2 and the M26. The exit is situated on a left hand bend, over the brow of the hill on the M20. There is enormous potential for this large influx of traffic to cause a queue back onto the M20; which is an unacceptably dangerous situation. The slip road from the M20 to Roundabout is only 450m long. I have calculated that with the average car being 4.5m long and with a 2m gap this equates to just 70 average cars will fit on the slip road. Obviously, when you start adding coaches and larger vehicles to this, the capacity will rapidly reduce. This M20 exit is regularly congested with queues of traffic, stretching the entire length of Wrotham hill and back up the A20 on a daily basis, with normal peak time traffic. And of course, any breakdowns in the vicinity by a tractor or HGV will just exasperate the situation. Brands Hatch Racing circuit is already holding

an event that weekend which will increase traffic volume. The local community has already had to endure a tragic accident last year on the same stretch of M20, caused by stationary vehicles which resulted in 2 fatalities.

- Access to the camping parking area – The access point marked as GV16, has a public access water standpipe located directly next to the entrance to the field. This water source is in constant use 24hrs a day. This is primarily used by road tankers which often queue to gain access. When they are parked in the small layby to use the water source, it will completely block the access. Even if the event attempted to get permission to stop access to this point, there will still be HGV vehicles attempting access and blocking the A20. (see attached picture)
- Exit Camping Parking Area – The point GV17 shown on the site map uses the single track road that is only 8ft wide. GV17 does not currently exist and the field is 1m higher than the road track along the majority on its length making it impossibly dangerous for vehicles to exit the field at the point shown. This is also the only access to the mast site and has the potential to block emergency vehicle access.
- Tower Industrial site – The tower industrial site is situated immediately opposite the event main site entrance GV10, with vehicular access 24hrs a day. In particular there is a HGV service and repair workshop that has HGV vehicles moved to and from site. There was a large fire at this site 2 years ago and because of the presence of compressed gas cylinders around the site, it resulted in a 500m exclusion zone being imposed by the local fire service. This would extend into the proposed event. There is no mention of the industrial sites access, potential risk or requirements in the traffic plan; this obviously poses a danger to traffic and pedestrians. During the public meeting the organisers admitted that they had not made any effort to engage with the businesses at the industrial site other than sending out the initial leaflets.
- Danger to other road users - Terrys Lodge road is a small road but serves as an access route for the local area to and from the Sevenoaks area, so is normally already busy on a Saturday. Turning coaches and cars in and out of the proposed parking/drop off and coach field has the potential of causing a collision to other road users.
- The proposed parking/drop off and coach field landscape, with access – This field is accessed via Terrys Lodge Road, shown as GV1 on the site plan, with a very acute angle to a singular 3.6m field gate. The narrow road and acute angle will require the 92 seater coaches to swing out into the wrong side of the road into oncoming traffic. This is going to be very dangerous, especially during the exit phase when dark, there are going to be pedestrians in the road as well as vehicles. Once through the gate the field drops away at a steep angle and the plan shows the coach parking to the immediate right, which still has a steep slope; the coaches will be leaning heavily to the left with an adverse camber. The whole field has very steep slopes with uneven ground; it is a popular sledging location when it snows. Most of this field is unsuitable and dangerous to anything other than a 4x4 vehicle. It is valley shaped and slopes down to a point which is the lowest point for all the surrounding land. During heavy rain, all the surface water runs to this point, making the whole field waterlogged and forms a large body of water at the bottom. Entering this area is going to be dangerous, especially in adverse weather, which is common on top of North Downs; even with the application of temporary metal roadways.
- GV2 Exit point - The proposed exit of the parking/drop off and coach field onto Terrys Lodge Road is shown as GV2 on the Traffic plan and currently does not exist. Creating this access point would require planning permission? This would be unlikely to be successful as the road is only 4.6m wide and on a bend. If this exit point is to be considered, its location would be dangerous.
- Pedestrian safety in proposed parking/drop off and coach field - The traffic plan mentions that parking will be arranged in order of arrival, nearest the venue, so pedestrians walk away from the traffic to reduce the risk of "vehicle and pedestrian conflict". There is no mention of how they will manage the much larger risk during the exit phase. People leaving will likely be intoxicated and trying to get to the coaches on the far side of the field, down an incline in the dark and across the path of exiting vehicles poses a high risk.

- Parking Marshals – this type of employee are usually transient and temporary due to the fact the events are based all over the country. Having looked at the traffic management company SEP Ltd recruitment page, this confirms that there is no pre requisite for experience and only says the applicant must be above school leaving age. There is 6 page PDF document with instructions on what to do. I am concerned this is the limit to the training and inexperience would be risky in such a high risk traffic and parking environment.
- Pedestrian Safety – There will be potentially a significant number of attendees wishing to enter and exit the site by foot. There is no street lighting in the surrounding area and only limited single track pathways on the A20. There is no pathway on Terrys Lodge Road, which has the potential to force pedestrians into the carriageway. There is no mention in the planning how they are going to manage pedestrians wanting to exit the site onto the A20. Any pedestrians heading to and from the south, will at some point have to cross the A20 at least twice due to the pathways not being continuous. Any pedestrians heading to and from Borough Green station will have to cross the narrow foot bridge across the M20 on Wrotham hill. Again, large numbers of people potentially intoxicated late at night, does not make a safe situation for themselves or the local community. All of this will of course be made worse by adverse weather and high winds that are common on the North Downs.
- Access to the proposed event site and surrounding area by emergency vehicles – My wife and daughter are both frontline ambulance crews for the London Ambulance Service (LAS). My wife is a Paramedic having worked extensively with South East Coast Ambulance and LAS. I myself am ex fire service and worked in loss prevention for a top tier COMHA site. We all have serious concerns over the impact this will have on the ability of emergency vehicles to access the surrounding area and the event.
- Personal safety of my family – My property would be completely surrounded by this event. I have concerns of the safety of myself and property. The event organisers have proposed erecting a fence around my property but this does not stop projectiles from being thrown from the campsite or the potential fire hazard from the large number of vehicles parked next to my property. There is also risk from the pedestrians that will be passing in front of my property on the A20.

The prevention of public nuisance

- Noise – There will be significant music noise due to our close proximity to the event, parking noise, additional road noise and camping area music which is proposed to go on to 3am. This is far too late and as shift workers the proximity and prolonged levels is going to affect my family's ability to sleep. The late night music, especially on Sunday, is unacceptable as many people locally have to work on the Monday.
- Light – There will be artificial lighting around the site operating throughout the night.
- Traffic – There is a high risk of major traffic congestion in the area. The organisers have made a prediction of the main traffic routes but in reality, people often now use navigation apps such as Waze which will attempt to take you through short cuts and back lanes. Any vehicles coming from the Sevenoaks area will most likely attempt to access the area via the west end of Terrys Lodge Road causing traffic in the surrounding single track roads. They have only proposed parking restriction on a stretch of Terrys Lodge Road and it will be impossible to manage effectively. Attendees will most likely abandon cars in the local area and walk in, causing a nuisance and danger. Whilst the organisers have estimated that a large number of attendees will use the public transport, this is just estimation. Research by A Greener Festival, who work with some of the biggest events in the UK, said that 60% of attendees travel to festivals by car. I feel it is clear that the organisers have either massively underestimated the parking requirements or deliberately chosen to ignore them, as they do not have the capacity.

The protection of children from harm

- Bus Stops - There are four bus stops in the immediate vicinity of the proposed event on the A20. Two of the stops are used by the school busses as pick up and drop off points. Due to the lack of parking, the parents have to park up and down the road; the children have to walk along the footpaths and cross the A20. These stops are adjacent to the proposed campsite parking entrance GV16 and GV17.

Environmental impact

- Rubbish – There will inevitably be large amounts of rubbish created at this site, as a direct result of the proposed event. The organisers have said they will have a team to regularly clean the area but I have concerns on the impact over a wider area and my own land. The Wings Of The Morning Field is situated right on the top of the North Downs and very exposed, we often have extreme weather that includes high winds. From past experience from previous events, rubbish such as plastic bags will be carried by wind a considerable distance and get stuck up trees in the surrounding expansive woodland, my own woodland area which is directly next to the camping. There is no way they will be capable of removing plastics stuck 20m up a tree.
- Wild life – We have an abundance of local wildlife such as badgers and foxes that will be affected by the long period of erected barriers and disturbance over the 2 weeks of the building phase. We also regularly see the Lesser Spotted wood pecker, which is on the RSPB red list and we have Tawny owls living in our woods. We fear the event will have a permanent effect caused by disturbance to areas that have never been used for anything other than farming.

Summery

The above objections are mainly focused on the traffic management side of the proposed event as this is the only part of the event planning I have seen to date. This Traffic Plan, in my opinion, is clearly inadequate and is an attempt to deal with a situation that is unmanageable due to the location being wholly unsuitable for an event of this size. I would have to assume that the rest of the plans and risk assessments for this event are likely flawed.

During the first public meeting the organisers said they had instructed three traffic managements companies to come up with solutions for the traffic management, I asked if they would share all three reports with me and they agreed. Despite several requests, I have still not seen the other two.

I would ask the question, why they have put so little effort into such an important safety aspect of this event having had months to prepare?

On A Personal Note

We have lived in our property for over 25 years which is located in an area designated as Area of Outstanding Natural Beauty. The green field land surrounding our property has never been used commercially and only ever been used for grazing and farming. If this licence was granted it would be devastating for my family and animals. It would set a dangerous precedent for the future of similar events.

We can see no benefit to local community from this event, just misery and problems as a direct result of it.

Regards

Steve Broszek

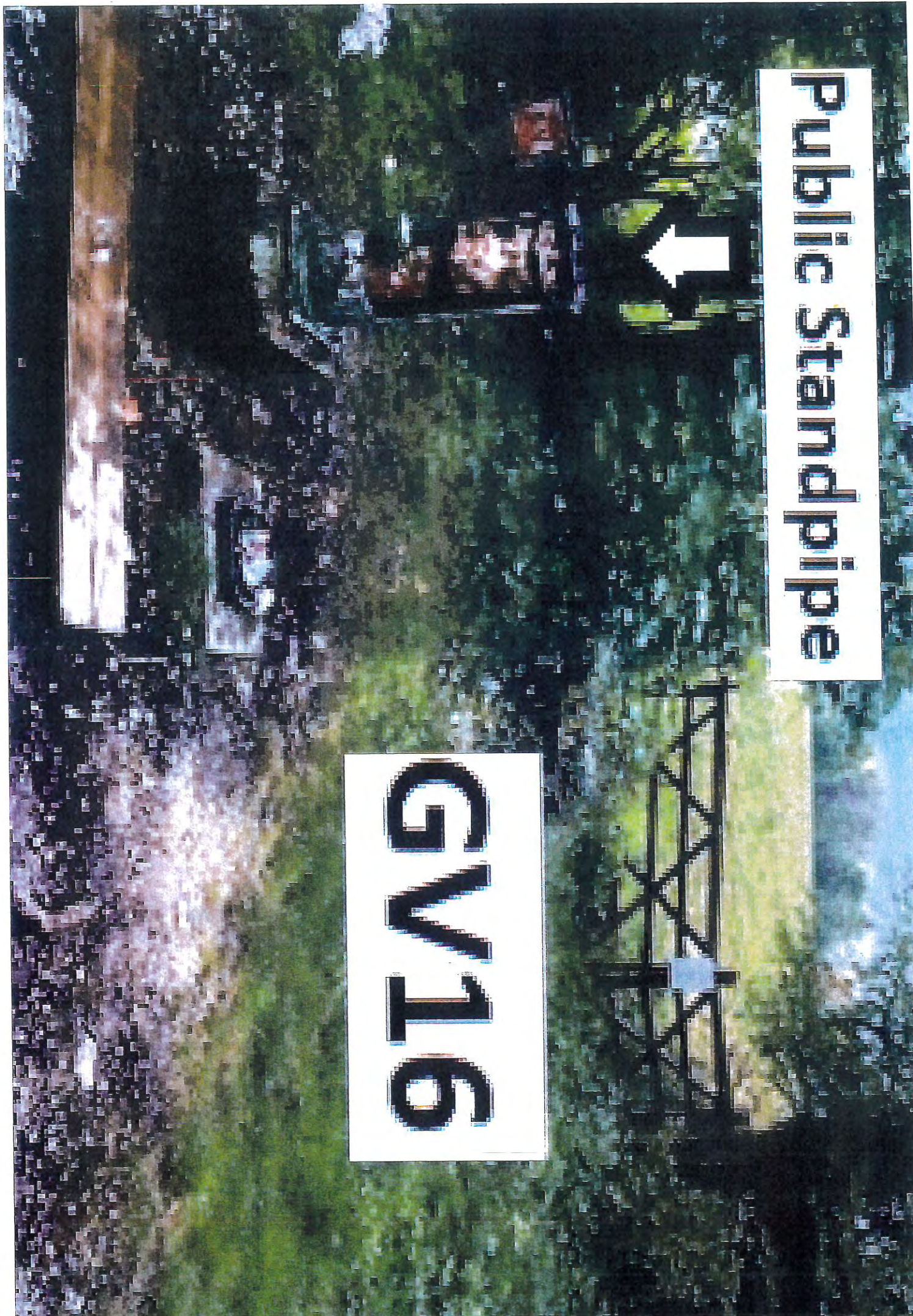


GV16



Public Standpipe

GTAG



OBJECTION TO APPLICATION FOR A PREMISES LICENCE

SOUTHBEATS FESTIVAL OF SBE LIVE LTD, Dane John Works, Gordon Road, Canterbury Kent CT1 3PP

PREMISES LICENCE TO USE THE PREMISES AT Wings of Morning, Wrotham Hill, Wrotham TN15 7NS for the provision of the below from 19/09/2019 and for a period of up to 5 days each year:

| | | |
|--|------------------|----------------|
| Films, Live Music, Recorded Music, Supply of Alcohol | Friday to Monday | 11.00 to 02.00 |
| Performances of Dance | Friday to Monday | 11.00 to 00.00 |
| Late Night Refreshment | Friday to Monday | 23.00 to 03.00 |

Based on information given at the Presentation by Proud Events Ltd; held Thursday 25th April 2019; I object most strongly to this application for the following reasons:--

I understand the phrase “...and for a period of 5 days each year” implies that if granted, this one application will automatically allow this 5-day event to take place at any time of the applicants choosing, over an unspecified number of years.

The expected attendance is 8,000 on Saturday & 12,000 on Sunday, and the majority will arrive by train or coach

The anticipated number of campers is 2,500 so they will occupy most of the available parking space.

The rail operator has been asked to lay on special trains at Borough Green & Swanley. However, at the time of the meeting, neither the approach nor the outcome had been confirmed.

They propose a continuous shuttle service of 92-seater coaches and at peak time which is midnight to 02.00am they will run 22 shuttles per hour.

There will be temporary traffic lights at the main entrance of the A20.

At the time of the Presentation, the Noise Plan was not available.

Each of the above contravenes one or more of the four **IAS** criteria for objecting to a Premises Licences.

1. Public Safety: With expected thousands of ticket-holders over the weekend of 21/22 September our population will be about quadrupled; causing mayhem chaos in our village, its roads, footpaths, and residents. The area is not capable of coping with such an influx of traffic & people. Station Approach is a junction with the A227 thoroughfare, difficult to negotiate under normal circumstances because of the siting of Sainsburys. Traffic flow in the village is at saturation point.

2. Prevention of Public Nuisance: In addition to the above, the proposal for 22 shuttle double-decker 92 seater coaches will cause chaos & gridlock.

3. Prevention of Crime & Disorder: With each camping ticket holder being allowed to bring in 24 can, plus a litre of wine or spirits; in addition to the alcohol being served on site from 11.0am – 2 or 3.00am the following day, there is inevitably going to be a rise in unruly, aggressive rowdy behaviour. There will no doubt be drug abuse which will lead to increase public disorder to the local populace.

4. Protection of Children from Harm: With all of the above in place, the children of Borough Green and the surrounding areas will be at a very significant risk of harm. Please bear in mind that the nearest hospital

with an A&E department is Maidstone; some 10.5 miles away. However, it doesn't have a Pediatric A&E service so any casualty involving a child under the age of 16 would mean a journey of 15 miles each way. This situation could hardly be called protective!


I urge the Licensing Panel of T&MBC to give serious, in-depth consideration to the tenets surrounding this application which will have a severely deleterious impact on our roads, public transport, crime, disorder and overall danger to our population

Signed



Date: 7th May 2019

Print Name: Christine M Hurl

Address:  Borough Green, Sevenoaks Kent.TN15 8RS

Anthony Garnett

From: Simon Masters [REDACTED]
Sent: 08 May 2019 19:49
To: Licensing Services
Subject: Southbeats Festival

Categories: Leeann

Hi,

I live in Borough Green and would like to register my objections against a licence being granted for the above event.

The road through the village is already very busy and this type of increased and nocturnal traffic will be a real pickle.

Regards,

Simon Masters

Sent from my iPhone

Dear Sir/Madam,

Please accept this as a representation regarding the application for a Premises Licence for Southbeats Festival, St. Clere's Estate, TN15 7NS, 20 – 23 Sept.

I live on the edge of Stansted, roughly half a mile from the A20 and a mile from the site of this event.

As such, I have a number of concerns regarding the proposed event and would ask that you do not grant a licence for it. We are a quiet, rural area with limited infrastructure and the event will cause significant disruption in terms of traffic and noise for local residents.

With regards to traffic access to the site, the A20 is a single carriageway in either direction from the roundabout at the end of the slip road for the M20 junction 2 (to the event), to beyond West Kingsdown. With the amount of traffic proposed, this will back up down the slip road and onto the M20. This will be dangerous. Returning to the M20 requires a journey down Wrotham Hill which already backs up at busy times. Traffic will also build up along the A20 in the direction of West Kingsdown.

Once traffic has problems on A20 going towards the M20 access road, drivers divert through villages such as Fairseat and Stansted and along often single-track roads. This causes chaos and danger as we often witness with diversions, especially if there are larger cars/vehicles involved.

There is an event on at Brands Hatch over that weekend which will already contribute to an increase in traffic along the A20.

There will be a huge number of coaches/shuttles driving through Borough Green and West Kingsdown to relevant railway stations, especially after midnight. Due to this, there will clearly be associated disruption during the day and noise after midnight, especially on the Sunday when residents will be sleeping in preparation for the working and school week.

The timing of music is unclear. On the Noise Management Strategy document, live music ends at 23.00 but on the licence application the time given for music ending is 02.00 the next morning. Which is it and what will be the impact of the later time?

Similarly, on the licence application the supply of alcohol ends at 02.00 each morning. What will be the impact of this?

In the presentation given to residents under the title Southbeats Festival Community Engagement, there is a proposed stopping/parking zone along A20, Ash Lane and Terry's Lodge. In the submitted Transport Management Plan these roads are designated as 'Proposed No Waiting Zone'. Which is it? If the former, then coaches will already be going along Terry's Lodge to the coach park; the A20 will be busy; and in particular, Ash Lane is often one vehicle in width with passing places at intervals. How can vehicles park/stop in these locations without causing a blockage?

There are several sections missing from the Transport Management Plan and these need to be addressed.

At night noise travels the furthest. We can already hear music from much smaller events at London Golf Club and within our village. With a pulsing drum/bass type music, the music from the event will be heard clearly and loudly until the event ends.

With regards to attendee age checks, safety and drug/alcohol use, can Southbeats guarantee a successful approach to curtail crime and disorder? Reports from their previous events would suggest not (see Kent Online October 5 2018).

I am also concerned at the lack of advertising/consultation with local residents regarding the event. Despite our relatively close location, I only heard about it through word of mouth. Would it be too much to suggest that this might have been to limit local knowledge and possible opposition?

In addition, tickets are already being sold for the event. This would appear a little presumptuous and suggests that the organisers are already very confident that the licence application will be successful.

If in the unfortunate circumstance that you see fit to grant a licence, then I would ask that it be for one year only and not open ended. In this way, the event can be monitored for disruption and appropriate action taken. With an open-ended licence, there would clearly be no control over what happens in subsequent years.

Yours faithfully,

Will Peat



Hatham Green Lane

Stansted

Kent

TN15 7PL.

Anthony Garnett

From: Margaret Jennings [REDACTED]
Sent: 08 May 2019 20:19
To: Licensing Services
Subject: Southbeats license application

Categories: Leeann

We strongly object to the music festival planned to take place at the top of Wrotham Hill in September of this year.

We do not think the site is at all suitable for the amount of people expected.

The chaos on local roads, possible vandalism, crime ,drug use and general upheaval associated with this sort of event.

The sound carries in an area like this, we know, because we can even hear the announcements when the boot fairs are held.

A festival like this should be held further out in the countryside.

Yours Sincerely

Mr & Mrs P. Jennings

[REDACTED]

Pilgrims Way
Wrotham
Sevenoaks Kent
TN15 7DE

Sent from my iPad

Anthony Garnett

From: Simon Greenstreet [REDACTED]
Sent: 08 May 2019 21:45
To: Licensing Services
Subject: Southbeats Festival

Categories: Leeann

From:
Suzi Castle

[REDACTED]
Wrotham,
TN15 7NR

I am totally against the idea of having a music festival with the noise over 3 days with no let up and I hear is likely to go on until the early hours of the morning. The noise that we are having to put up with every weekend with the increased traffic from Brands Hatch is horrific. The congestion on the A20 is bad enough with normal traffic but to increase it over that time I feel is totally inconsiderate. I run a rescue centre for animals and have recently taken in 2 nervous ponies, can you imagine any animal having to listen to thumping music hour after hour you may like it but people living

around here are fed up with the increased noise pollution. Please don't add to it !

Anthony Garnett

From: Marilyn Connelly [REDACTED]
Sent: 09 May 2019 09:04
To: Licensing Services
Subject: South Beats Music Festival to be held 19-22 September Wrotham
Categories: Leeann

To whom it may concern.

I should like to register that I and my husband are COMPLETELY OPPOSED to the granting of an annual license for the above event. The venue is totally inappropriate for a number of reasons.

- 1) It cannot be sufficiently monitored by police to safeguard the high numbers of children and young people who will inevitably attend such an event and who will be vulnerable to being exploited by drug dealers as has been shown by events run similarly in past years in other locations. The same goes for alcohol. Therefore public safety is at great risk.
- 2) The event will cause a plethora of pollution and damage not only to neighbouring residents but to flower and fauna because of the noise and the toxic detritus from camping due to the sheer numbers using the sites. Who is going to pay for and put right the damage? Surely this is deemed a Public Nuisance.
- 3) This type of venue attracts organised gangs and organised crime as has been observed at other venues such as at Quex Park and Lympne Park where there were not only personal injuries sustained but also several assaults. I am most concerned that there will be insufficient police available to adequately prevent crime and disorder.

All in all I believe that it is of the utmost importance to prevent this event from being granted a license as it will cause irreparable harm to the environment and to many of its attendants.

Yours sincerely
Marilyn and Mark Connelly. [REDACTED], Fairseat, TN15 7LX)

Sent from my iPad

Anthony Garnett

From: [REDACTED]
Sent: 09 May 2019 11:33
To: Licensing Services
Subject: Southbeats Festival - Wings of the Morning Field, Wrotham
Categories: Leeann

Dear Sirs,

I am writing to express my concerns over the proposal to hold a 2 day music festival at the site in September as follows:

The prevention of Crime and Disorder

We need guarantees put in place that there will be sufficient security on site. With this type of event there will be alcohol involved and potentially drugs which is a lethal combination. Added to the volume of people at this event, this could naturally lead to more antisocial behaviour, either at the event or in the surrounding area after people leave. We do not have a huge police presence in this rural area. Will there be extra officers on standby for that weekend in case of issues that the security team cannot handle? There were reports of assault at last year's event at Port Lympne and that was just a one day event.

Promotion of Public Safety

As with any temporary event of this scale there needs to be utmost attention paid to the safety of the equipment and staging that is set up around the site, especially with the injury caused by falling scaffolding at the first event Southbeats held at Quex Park.

I also have a huge concern about the sheer volume of traffic that this event will generate. I believe this is the first time this event will be for 2 days and unfortunately, with camping only being provided for approximately 17% of the expected attendees most people are going to be arriving at the site by car/taxi. I appreciate the organisers are planning to coach people to/from local stations, however, with limited late night services out of Borough Green and Swanley, I can't see that this will be a popular option, unless the organisers are arranging with South Eastern to run extra trains?

I know that even at experienced event sites (ie Kent County Showground) have had problems with traffic at the end of an event. I am concerned that there is insufficient care parking shown on the event plans and this could lead to cars being left in local streets or country lanes which will affect local residents' movement and also could prevent emergency vehicles getting through to residential areas. Also, what consideration is being given to the fact that this sheer volume of extra traffic is bound to affect local businesses. Given that the A20 is just a single lane in each direction at this point, the likelihood is that traffic will end up queuing and potentially back onto the M20 which will be very dangerous. At least when there is an event at Brands Hatch there is dual carriageway available so that through traffic can pass whilst event traffic is queuing. Also, what contingency is there for a refuge area if any vehicles break down whilst queuing for this event.

The prevention of Public Nuisance

I have read the Noise Management Plan, obviously I have limited understanding of such things, but I did notice the only locations mentioned in terms of noise measurement are Labour in Vain Road, Old Coach Road and Plaxdale Green Road. These are all on the opposite side of the A20 from the event site. Given the location of the site, at the top of a hill I can see no consideration given to other surrounding areas in terms of the sound travelling from the site (ie Kemsing, Knatts Valley, Wrotham etc).

The protection of children from harm

Whilst I appreciate this event is not aimed at children the target audience does have a young profile of 18-26. I have read reviews of previous Southbeats Events which are extremely negative and lead me to believe that the organisers do not provide sufficient security. What security will there be to check that none of the entrants are

under age (given that the girl that was injured at the first event at Quex was just 16, and that there are no drugs being bought on to site? There have been reports that drug selling was rife at previous events.

In addition, I was interested to learn that The Hop Farm and The Kent County Showground have refused to host this event which surprises me given the experience and infrastructure that is already at these sites for an event of this size. And I wonder why Quex and Port Lympne have chosen not to hold this event again.

I look forward to receiving assurances that, if this event is allowed to go ahead, that it will be well managed with regards to all the points above with little or no disruption to people living in the surrounding areas.

Yours faithfully,

Michelle Savin-jones



Wrotham

Sevenoaks TN15 7BY

Anthony Garnett

From: Anne Woods [REDACTED]
Sent: 09 May 2019 12:08
To: Licensing Services
Subject: Southbeat music festival

Categories: Leeann

All these events have an impact on surrounding areas especially in the countryside as seen in many other places where these type of events have taken place. Apart from the noise pollution, and the light pollution to local area, it's also impacting on the natural beauty and wildlife of all sorts that live in the area. We should be doing our part to protect all this with regard to the long term future of the planet as demonstrated in London recently.

Kind regards

Bob Woods

HARRISON


SOLICITORS

GRANT

45 BEECH STREET
LONDON EC2Y 8ADTELEPHONE: +44 (0)20 7826 8520
WEB: www.hglaw.co.ukLicensing Services
Tonbridge & Malling Borough Council
Gibson Building, Gibson Drive
Kings Hill, West Malling
Kent ME19 4LZBy email only to Licensing.services@tmbs.gov.uk

Your ref: 19/00461/PREM

Our Ref: WRO0012


9 May 2019

Dear Sirs,

Representation in connection with the Premises Licence Application for Southbeats Festival at Wings of the Morning, Wrotham Hill, Wrotham, TN15 7NS

We act for Wrotham Parish Council and make this representation in order to strongly object to the granting of a premises licence under the above referenced application (the "Application").

Wrotham Parish Council represents a rural community facing significant detrimental impact with no community gain if SBE Live Limited (the "Applicant") is granted an indefinite licence at the Wings of the Morning site (the "Site").

1. Executive Summary

This representation will firstly comment on the consultation process and the inadequate access to Application information, which we consider to clearly contradict the promotion of open and accountable local government and the strong public interest in the disclosure of information. The obstructiveness of this process prompted us to request that the consultation period be extended. This extension was refused on 8 May 2019, and we reserve our position in this regard.

The representation will then go on to set out that the Application fails to promote the licensing objectives (the 'Licensing Objectives') as is required under the Licensing Act 2003, Government Guidance, and the Tonbridge and Malling Licensing Policy 2019-2024. Particular attention is given to the promotion of public safety, the prevention of crime and disorder, and the prevention of public nuisance, noting that there exists a degree of fluidity between the objectives.

Finally, this representation will briefly raise issues relating to planning which the Licensing Authority should be mindful of as we do not consider the Applicant to be in possession of the

necessary planning authorisation as is required under the Licensing Policy 2019-2024 (paragraph 3.20).

1. Consultation period and access to information

The provision of information in connection with this Application has been insufficient for the purposes of allowing persons likely to be affected by Southbeats Festival reasonable opportunity to submit representations.

The Public Notice (which is undated) states that applications are available to be viewed by the public via the register which it states can be "*accessed online by visiting at www.tbmc.gov.uk and following the links.*" The website address provided is to the Council's homepage, from which there are no links to follow for this Application or for licensing in general. Instead, users must search for licensing and eventually find the correct page which lists Southbeats as a new application. The only documents provided here are the Public Notice itself, and a tracker document which contains a one-line summary of the Application, its reference number, and some relevant dates. The completed Application is not publicly available for inspection, nor are any supporting documents.

Further, when requests have been made by our clients and by us to obtain the Application documents, these have been provided with considerable delay (or in our case, not yet provided following a request made on 1 May 2019), thus encroaching heavily on the consultation period in which representations must be submitted.

Commentary to the Licensing Act 2003 sets out that the aim of the Licensing Objectives is to ensure that licensable activities are carried out **in the public interest** (paragraph 36). As the Licensing Authority may only consider representations that are relevant to the Licensing Objectives, it follows that it is heavily in the public interest that Application documentation pertaining to these objectives should be readily available. Further, our clients and other persons have a legitimate expectation that such documents will be available for inspection for the duration of the consultation period. This has not been the case for this Application.

It is also a requirement of the Licensing Act 2003 that the Licensing Authority's licensing policy is published before it becomes operative. The Licensing Authority have confirmed¹ that the Tonbridge and Malling Licensing Policy 2019-2024 became operative on 15 April 2019, replacing the previous 2014-2019 policy document. However, the operative policy has not been published and is not publicly available. Such action not only prevents the public from reviewing the Application against the operative local policy during the consultation period, but it also means that the Licensing Authority is currently breaching its duties under section 5(1)(b) of the Licensing Act 2003 (the "Act").

It is also noted that the Licensing Authority is not demonstrating that it has a Register of issued licences or advising the public that it has facilities for making the information contained in the entries in its register available for inspection (as required under section 8 of the Act).

2. The Licensing Objectives

Public safety

¹ By email and by telephone on 1 May 2019

(a) SBE Live Limited

A previous licence holder for this event was South Events Live Ltd. This company shares a Director with SBE Live Ltd (the Applicant company), Maximilian David Weston,² and both list him as the only person with significant control of the companies. Further, the Applicant company was registered at the same address as South Events Ltd (142 Bingley Court) when it was incorporated in November 2017 until this was changed in July 2018. The Applicant company is yet to file accounts. It is reasonable to consider that these two companies are manifestly the same, and therefore South Events Ltd's failings in respect of public safety should not be overlooked. In November 2017, South Events Limited pleaded guilty at Canterbury Magistrates' Court to two offences under the Health and Safety at Work Act 1974 after a scaffolding pole fell and injured members of the public, including a 16 year old girl who suffered a serious head injury.³

(b) Car parking provision and highways

WPC is also particularly concerned about the proposed car parking provision at the Site and its impact on public safety. The Application makes insufficient provision for public safety in respect of car parking at the Site, and only includes car parking in the public nuisance section of the Application.

The Site Plan (version V2G) identifies Terry's Lodge Road car park as suitable for coaches, pick-up and drop-off, and day parking (outlined in orange to the northwest of the Site). WPC strongly maintains that this car park cannot function in the manner that the Applicant proposes and to do so would fail to promote public safety.

WPC strongly asserts that the topography of the Terry's Lodge Road car park – which is characterised by heavy clay over a chalk sub-strata and becomes extremely slippery when wet - is entirely unsuitable for coaches and buses, of which the Applicant proposes there will be 50 coaches and 90 shuttle buses at a frequency of 10 buses per hour.

The section of Terry's Lodge Road car park that runs parallel to the A20 has been identified as varying in height by 7m over a distance of 190m (see Annex 1 – car park topography using Google Earth). From the entrance identified as 'GV1' on the Site Plan, there is an immediate and significant slope downwards and as the proposed roadway turns south to run parallel with Terry's Lodge Road. WPC confirms that there is a negative camber that presents a significant likelihood of tipping force away from the road which would be particularly significant for the proposed double decker busses operating the pick-up and drop-off service, as proposed by the Applicant.

WPC has considerable experience in facilitating events, such as Wrotham Steam and Transport Rally, using the Wings of the Morning field and the Terry's Lodge Road field. It is therefore well-placed to confirm that in the event of wet weather the surface of the car park and the steep slope into the carpark become extremely slippery and vehicles including cars and coaches are likely to lose traction. It is likely therefore, that drivers (particularly of buses timetabled with a very narrow turnaround time) will favour avoiding entering the car park all together and pull over on the A20 (which runs along one side of the Terry's Lodge Road car park), therefore exposing passengers and other motorists to substantial danger.

² <https://beta.companieshouse.gov.uk/company/11065875/officers> and <https://beta.companieshouse.gov.uk/company/10018544/officers>

³ <https://theislofthanetnews.com/2017/11/17/southbeats-organiser-fined-over-injuries-during-festival-at-quex/>

In addition, it is our position that the proposed egress identified on the Site Plan as 'GV2' from Terry's Lodge Road (which does not currently exist) will require planning permission as it is a classified road and therefore is not caught by permitted development (see section 4 (Planning) below for further discussion). WPC is concerned that an egress in the proposed GV2 position would be further to the detriment of public safety, most significantly because of the poor sight lines to the north of the egress, as well as the narrow width of carriageway. Evidence of this is also documented by the Highways Technical Appraisal carried out by Les Henry Associates Limited which we understand has been submitted as part of the consultation⁴. The Application fails to consider these safety impacts, or the public nuisance created by resultant traffic congestion, in any meaningful way. It therefore fails to comply with the Licensing Policy 2019-2024 which requires the Applicant to show how the physical safety of persons attending the premises will be protected and to offer any appropriate steps in the operating schedule to promote this (paragraph 17.16).

Moreover, insufficient and inadequate parking provision is likely to result in cars parked outside of designated areas causing a substantial risk to public safety, both for local traffic and Festival attendees making their way to and from their cars (including at night on roads without street lighting). The considerable deficiency in the predicted numbers of cars as identified by in the representation submitted by Stansted Parish Council may also amount to a public nuisance for people from Wrotham trying to move through the area, and we support the position that these figures should be reassessed.

Prevention of crime and disorder and the prevention of public nuisance

WPC has significant concerns over the ability of SBE Live Limited's to prevent crime and disorder. SBE Live Limited has not put on a multi-day festival with camping before, and whilst its agent, Proud Events Ltd, has run festival events before, these have been in urban settings where the challenges are very different to those presented at the Site.

In a rural setting, as is proposed, there is a particular threat of illegal drugs and/or people without tickets being able to infiltrate the Site as the perimeter is more difficult to secure. This has been identified at previous Southbeats Festivals. We do not consider that this risk has been adequately addressed by the Applicant as is required under the Tonbridge and Malling Licensing Policy 2019-2024, which necessitates that the detail should reflect the location and character of the area (para 17.10).

Further, the Applicant refers to illegal drugs, but it is unclear how it intends to deal with other substances which are prevalent at music festivals, such as nitrous oxide ("NOs gas"). A number of comments and reviews of previous Southbeats Festivals have observed dealers operating with apparent impunity and making no efforts to conceal their activities⁵.

Whilst the use of NOs gas is not illegal, the supply, or possession with the intent to supply, is a criminal offence (sections 5 and 7 of the Psychoactive Substances Act 2016, which was intended to remove what had been 'legal highs'). This, and many other psychoactive substances cannot be detected by sniffer dogs. Moreover, it is commonplace at festivals that empty NOs gas canisters are discarded in their thousands. The rural nature of this Site makes

⁴ Photographs of these poor site lines and narrow carriageway can be seen in Appendix A to the Highways Technical Appraisal carried out by Les Henry Associates Limited

⁵ Licklist Reviews: <https://licklist.co.uk/southbeats-festival/reviews> and Google Reviews: <https://www.google.com/search?safe=active&ei=c6nRXPqODMSO1fAPqcm8EA&q=southbeats+festival+google+review&og=southbeats+festival+google+re&qsl=psy-ab.1.0.33i22i29i30i2.2779.3079.3821...0.0.0.128.244.2i1.....0....1..qws-wiz.....0i71j33i160.8snf7bxHqGU#lrd=0x47d94d65b0b7c477:0x45f885d81f8d7e5a,1...>

it particularly vulnerable, as discarded canisters can be easily missed in the clear up and present a serious threat to animals (including agriculture, local wildlife and dogs walked in the area) and damage to farm machinery. Further, the Applicant does not provide details on how these canisters will be disposed of and whether they will be recycled. See Annex 2 for a photograph of discarded NOs gas canisters following a festival (for illustrative purposes only).

WPC would also like to remind the Licensing Authority of their duties under the Licensing Policy 2019-2024 to review the cumulative impact of granting the licence on an annual and indefinite basis and, particularly, to take into account the effect of police resources in coping with the Festival and the influx of almost 15,000 attendees plus staff. WPC consider this to be a particularly important exercise given the rural location of the Site.

In addition, the Applicant states in its Event Management Plan that it has assessed the 'risk of crowd disorder' to be "low", due to factors including an early finish time of 11pm, and experience of previous events. We consider this assessment to be erroneous. The Application requests a licence for amplified music until 2am (not 11pm) and an alcohol licence to sell alcohol until 3am. This means that attendees will be able to access to alcohol for 16 hours per day (11am until 3am). We consider this to be excessive and amount to a high risk of crowd disorder, both in relation to those exiting the Festival and those staying at the campsites. It is also at odds with the Licensing Policy 2019-2024 (paragraph 17.11) which expects *"a short (e.g.30 mins) 'wind down' or 'drinking up' period allowed for after the cessation time of entertainment and alcohol sales as this is effective in assisting in a reduction in noise and exuberance of customers before leaving the premises."* Moreover, we contend that a finish time of 11pm would not necessarily reduce the risk of crowd disorder, as attendees would either be collecting around the campsites or attempting to leave the Site in order to carry on their night at other venues. Further, it is argued that the Applicant's experience of previous events is not sufficient to deem it low risk given neither the Applicant, nor Proud Events Ltd have experience of running a festival which involves attendees staying onsite.

3. Planning

Whilst we accept that licensing and planning are subject to separate regulatory regimes, we wish to alert the Licensing Authority to relevant planning issues in relation to the Application, and remind the Authority of its policy position that applicants should be in possession of necessary planning authorisation (paragraph 3.20 of the Statement of Licensing Policy 2019-2024).

The proposed egress identified on the Site Plan as 'GV2' from Terry's Lodge Road will not qualify as permitted development as it is a classified road and will therefore require planning permission (see Town and Country Planning (General Permitted Development) (England) Order 2015, Schedule 2, Part 2, Class B which states that *"the formation, laying out and construction of a means of access to a highway which is not a trunk road or a classified road, where that access is required in connection with development permitted by any Class in this Schedule is permitted development"*.)

The classification of Terry's Lodge Road as C31 and the Maintenance Hierarchy as a 'Minor Road' has been verified by the Kent Highways Authority. As identified under the 'public safety' heading above, the proposed egress identified as 'GV2' poses significant safety risks and its positioning has been identified as particularly susceptible to congestion. Neither of these issues have been adequately identified or assessed by the Applicant, and therefore WPC considers it essential that the Licensing Authority require this planning permission to be

obtained by the Applicant before any licence is granted. This will ensure that detailed plans of the egress are submitted and scrutinised by the local planning authority, and the safety aspects highlighted in this represented are fully considered.

Further, we have identified a Tree Preservation Order dated 3 August 1982 (the "TPO")⁶ which exists for the protection of a group of trees (including oak, ash, hornbeam and holly) on land adjacent to bridleway 224 between the A20 and the M20 in the Parish of Wrotham. The TPO exists to prevent cutting down, damaging, or uprooting of the trees without prior consent from the Local Authority. These trees are situated within the proposed Main Arena area which is identified on the Site Plan. The protected trees are visible on the Site Plan, either side of the section marked 'GP9', and are particularly vulnerable given their location within the Main Arena. They are surrounded by a bar, bar compound, and large stand, as well as providing access through the middle section of the trees. The footfall of over 15,000 people (attendees and staff) plus the significant weight of the proposed festival infrastructure and associated transportation within the 'Root Protection Area'⁷ of the trees and is of particular concern. The Application does not reference the effect of the proposed festival on these protected trees (including their roots) or the habitat they may provide for wildlife and birds; nor of the effect of the noise and/or fireworks on the wildlife. We therefore advise that a relevant conservation/trees/ecology officer at TMBC is engaged before any licence is granted.

4. Conclusion

WPC strongly objects to any licence being granted under the Application.

As we have set out in this representation, there are significant and demonstrable safety issues, particularly with regards to inadequate car parking in areas of the Site which have been identified as being unsuitable for large vehicles particularly in inclement weather.

WPC is also particularly concerned about the cumulative impact that an annual and indefinite licence would have on the local community and rural environment, as well as the strain it would place on local highways and public services including the police.

Further, no community benefits have been offered by the Applicant to mitigate the substantial impact that the Southbeats Festival will have on Wrotham and other surrounding villages.

WPC maintains that the Application manifestly fails to promote the Licensing Objectives (particularly public safety, the prevention of crime and disorder and the prevention of public nuisance) as is required under the Licensing Act 2003 and local licensing policy. As also identified in this representation, there are also serious concerns over the Applicant company's safety record and its ability to run an event of this scale.

Yours faithfully,



Harrison Grant

Enc.

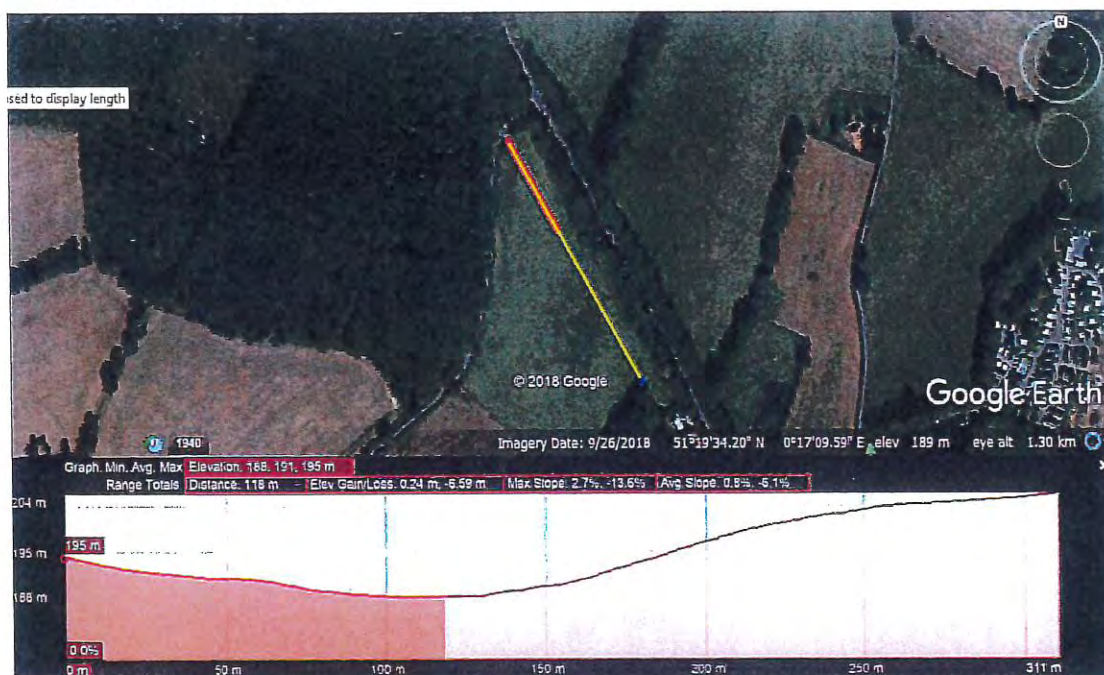
⁶ A copy of the TPO can be accessed here: <https://mapsat.tmbc.gov.uk/PDFs/TPOs/545291.pdf>

⁷ The minimum area around a tree deemed to contain sufficient roots and rooting volume to maintain the tree's viability (British Standard BS5837:2012)

Annex 1

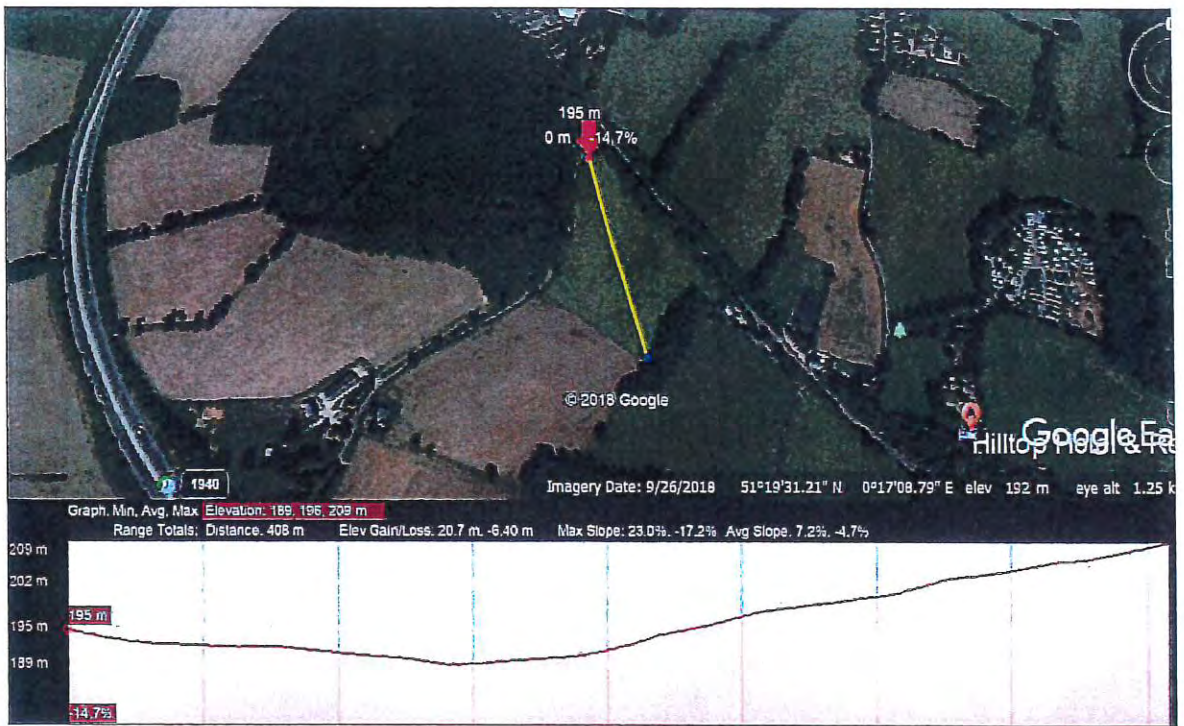
Google Earth photographs illustrating topography of Terry's Lodge Road field

Site profile of Terry Lodge Road Car Park showing the varied terrain from the car park entrance to the other side of the field
— source Google Earth Pro



Site profile of Terry Lodge Road Car Park showing the varied terrain from the car park entrance to the other side of the field
– source Google Earth Pro









Terry Lodge Car Park size



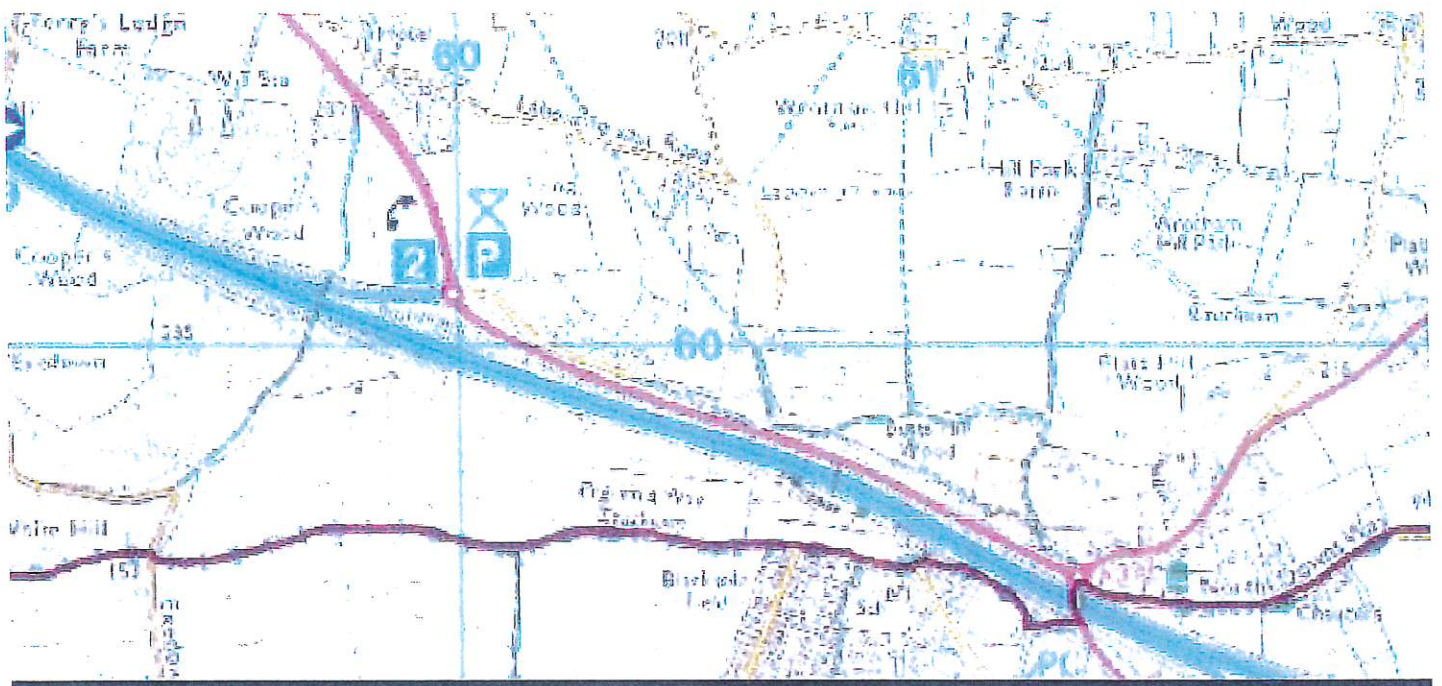
A20 camping car park



A20 Site Parking







Annex 2

Photograph of discarded NOs canisters at a festival (illustration purposes only)



Anthony Garnett

From: Moira Green [REDACTED]
Sent: 09 May 2019 14:49
To: Licensing Services
Subject: Southbeats Festival September 2019
Categories: Anthony

I live at Tare Reede in Labour in Vain Road, not far from the junction with the A20.

I have been to the meetings held by the team applying for the license and have listened to their plans.

I am now making a representation in relation to this application.

The grounds for this representation is my concern over the safety of locals and road users as a result of increased traffic use.

Some of the locals were late to the first meeting held at the Moat as an accident had caused a back up from the bottom of the hill up the A20 past the entrance to Labour in Vain Road. Some cars caught in this were turning around in the junction. I had to drive 'the backway' through country lanes. When this happens drivers who are not used to such roads get stuck and sometimes have difficulty reversing.

Living here we are used to the build up of traffic when there is an event at Brands Hatch.

Please see the information below from the Brands Hatch Website

HSCC Historic Car Championships

Brands Hatch (Indy)

Saturday 21 September 2019

The Historic SPorts Car Club returns to Brands Hatch this weekend for a busy event on the Indy Circuit.

Classic Formula 3 headlines this Historic meeting along with a race for Ford Escorts, who have been invited back by the club to repeat their races from 2018.

The full racing line-up includes the Historic Road Sports, 70s Road Sports, Historic Touring Cars, Historic Formula Ford, Classic Formula 3, Historic Formula Ford 2000, and the Ford Escort races.

The paddock will be open for this event allowing spectators to get up close to the historic machines as they are prepared for racing.

Brands Hatch is situated on the A20 near West Kingsdown. Just 3 miles from junction 3 (Swanley) of the M25, it is linked via the A20 to the M20 and M25/26 motorways.

As you can see Brands Hatch described the meeting as a busy event and direct users via the M20 and M25/M26 via the A20 to Brands Hatch.

The organisers of the Southbeats event explained that as well as cars arriving to the field on the A20 there would be a shuttle service from Borough Green and Wrotham Station. They did inform us that they intend to employ a traffic control firm. However good this firm is they cannot control the volume of traffic. There will be the normal users and Brands Hatch users and those going to the Soundbeats event.

If the A20 gets grid locked I am concerned as to how emergency services are going to get to myself and my neighbours if needed.

In addition traffic leaving the M20 for both Brands Hatch, the Soundbeats event and normal use may start to queue back along this busy road with lorries going to Kent ports. This has the potential to cause an accident.

Thank you for considering this representation.

Moira Green

Mr and Mrs A Ayiotis

[REDACTED]
London Road
Wrotham
Kent TN15 7NT

8th May 2019

Tonbridge and Malling Borough Council

By Email

For the attention of the Licensing Department

Dear Sirs

RE: SOUTHBEATS Festival Licence Application

I wish to object to the licence application by Southbeats to hold a Festival from 19th September 2019 for up to 5 days. I have an interest in this application as I live directly opposite the proposed site.

My objections are as follows:

Prevention of crime and disorder

- The expected age of the festival goers is between 18 and 25 so alcohol and drugs are going to be an issue. The event will attract drug dealers into the area with the sole purpose making money and no consideration for the consequences. How will the event organisers control this if the staff they are employing to check bags etc are of a similar age and seasonal workers without the experience. Extending the licence to 3am will only encourage misuse of alcohol and drugs.
- Crime – Potential for criminals to come into the area knowing belongings are left unattended. Perimeter fences around the area are meant for livestock and access easily be gained.
- There are no public transport services in the immediate area. The end of the line for the buses is by the Potabello Pub in West Kingsdown. A high number of attendees will be traveling by public transport to the event so will be using the train stations in the other villages a few miles away. The coach loop suggested will be using Borough Green Station. There are other stations locally and nothing stopping attendees from using these and walking. Therefore, a high possibility for disorder and vandalism to the surrounding areas.
- Festival attendees will be using local shops and amenities available in West Kingsdown and Borough Green which are not suited to such high volumes. Causing more traffic problems and possible public nuisance especially if intoxicated.

Promotion of Public safety

- There is a public stand pipe used 24 hours a day and primarily used by tankers who are often queuing in the layby whilst waiting. This is in the proposed traffic plan to the event and therefore potentially causing more traffic congestion and blocking the access routes for the event.
- The proposed traffic system using the M20 junction 2 is not adequate for the volume of vehicles and presents a danger to vehicles having to que on the M20 itself to exit. Brands Hatch is also holding an event that weekend and this only will add to the congestion. By not letting event traffic turn right into Terrys Lodge Lane they will be sending them up to the same roundabout where the M20 exit is. Wrotham Hill is regularly congested with queues of traffic. Previous events held at this venue have seen cars being parked on local verges all around the surrounding areas adding to traffic congestion and traffic incidents. If there is an accident on the M20 the traffic tends to also be pushed onto the A20 so there is the potential for more traffic chaos.
- Coaches – The size of the coaches they will be using are far too big for Terrys Lodge Lane and will cause problems for any other traffic using this road.
- Traffic lights – These will cause a build up of traffic. The A20 is a busy road and soon builds up if there are any problems. These traffic lights will cause a problem for local and event traffic.
- Pedestrian Safety – There is no street lighting in the area and very limited single-track pathways therefore forcing pedestrians onto the carriageway. There is no mention of how this is to be controlled.
- Parking Marshalls – event staff companies employ temporary staff, and these will not be experienced enough to control the number of cars that will be coming into the area and dealing with the existing high levels of local traffic.

Prevention of public nuisance

- Animal Welfare – our horses are stabled less than 50 feet away and directly opposite the proposed campsite entrance. The traffic congestion is going to cause stress to the horses as well as the noise from the music. To extend the music by 3 hours would only add even more stress and be harmful to their daily life. The campsite will be busy 24 hours a day and potentially very noisy too. All around the site the fields are used for grazing by local farmers for their livestock. They live out doors and will also be exposed to unnecessary stress and will be vulnerable.
- Noise – The music will be going on for hours and some of the stages are set right next to the road which means there is no screening and the volume will be projected for miles. Not only the music but the traffic and campsite will add to the impact on the local community's daily lives. To extend the licenses for music, alcohol and refreshments to 2/3am in the morning is far too late.
- Light – there is no public lighting in the area so the artificial lights will affect not only the people living in the vicinity but the wildlife.
- Fire Risk – The campsite has a potential as a fire risk. At other similar events to this the campsites light BBQ and fires. This will put our houses and the surrounding woods at risk as feel these will not be used by responsible people.

Protection of children from harm

- Bus stops - The school bus stops are next to the site and are busy during school pick up and drop off times. The parents park up and down the road and during these times the children will be exposed to increased risk because of the high levels of traffic and the possibility of parents being caught up in the congestion. There is potential for the footpaths to be blocked pushing the children out onto the carriageway.

I would like it noted that Southbeats have not tried to contact us at any time or notify us through our door through leafleting. We were unaware of any meetings that were held. I contacted St Clere Estate and it was suggested could I possibility move my horses to somewhere else for the weekend. This is not viable.

The impact on our lives, our animals and our neighbours will be quite damaging. The area is not suited for this type of event and the age range of the attendees.

Yours faithfully



Lynn Ayiotis



Andreas Ayiotis

Anthony Garnett

From: kevin heelan [REDACTED]
Sent: 09 May 2019 16:52
To: Licensing Services
Subject: RE: sound beats music festival

Categories: Anthony

[REDACTED] labour in vain road wrotham tn15 7pa

Sent from [Mail](#) for Windows 10

From: Licensing Services <Licensing.Services@tmbc.gov.uk>
Sent: Thursday, May 9, 2019 3:25:52 PM
To: kevin heelan
Subject: RE: sound beats music festival

Dear Mr Heelan,

Thank you for your of representation regarding the above premises. In order to validate your Representation could you forward your address.

The reason we ask for address details is to ensure we do not receive multiple identical, frivolous or vexatious Representations.

I will be writing out to everyone who has made a Representation explaining the procedure and explaining what part of their Representation will be redacted. We do not publish signatures and will redact the address, just showing the Road.

The Licensing Hearing to consider the premises licence application will take place on the 7 June 2019 starting at 10:00 hours. This Hearing will be open to the public and will be held in the Council Chamber, Gibson Building, Gibson Drive, Kings Hill, West Malling, Kent, ME19 4LZ.

If you have any queries regarding this email then please do not hesitate to contact me.

Kind regards

Licensing Team

From: [REDACTED]
Sent: 05 May 2019 18:33
To: Licensing Services <Licensing.Services@tmbc.gov.uk>
Subject: sound beats music festival

Sirs I am sending this email to object to the application for a license to hold a music festival at the field on the top off wrotham hill, on the 19/22 september as I feel the area would not be able to cope with the amount off traffic. as the round about can get quite busy at the best off times also I under stand that brands hatch has an event on the same week end I feel this would cause a lot off problems, also the noise pollution would cause al lot problems for the local wild life, and animals the live in the area and also the people in the local area. I live at [REDACTED] in vain road tn15 7pa

Anthony Garnett

From: Denise Allgood [REDACTED]
Sent: 09 May 2019 21:14
To: Licensing Services
Subject: Southbeats Festival of SBE Live Limited - Application dated 9th April 2019

Categories: Anthony

I would like to object to this Application for the following reasons:

1. Application states, ".....for a period of 5 days each year." Why is this an "Open" Application? Surely for such a large, locally disruptive Event there should be an Application for each Event. Southbeats have already said that they expect the Event to grow in size each year. If this application is passed, what happens if there are complaints that reflect the terms you have passed. Can this licence be cancelled or altered depending upon the success of this year, should it go ahead.
2. Application states, "Films, Live Music, Recorded Music, Supply of Alcohol 11.00 – 02.00." It is difficult to comment on these times as it is not clear whether this refers to each day, from 11.00 am on Friday until 2.00 am on Monday morning or exactly what it means. When we attended the consultation between the organisers and the local residents we were told that the times would be as follows: Campers to arrive from 5 pm on Friday and able to camp until 12 noon on Monday. We were told that the live music in the show ground would be from 12 noon until 12 pm on both Saturday and Sunday. Then in the campsite there would be provision for music from 12 midnight until 3am. Food served until 3am. Drink until 2am. We find that totally unacceptable. At other music festivals live music often finishes at 11 pm and then a silent disco is held following this, in order not to disrupt the local area and residents. This would be far more acceptable. It also seems completely unacceptable and unnecessary to have live music in the camping area from 12 midnight until 3am. This is normally a very quiet country area and the sound covers a considerable area. The site is very open, situated on top of a hill in a quiet, rural location. We live across a field from the end of the field where the showground is. The prevailing wind is always from the south west, which would mean the sound travelling directly in line to the houses in Labour-in-Vain, the mobile home site and Wrotham Hill Road. Our experience is that when boot fairs have been held in the past on Sunday mornings, we could hear "word for word" the announcements on their public address system, inside our house with double glazing. To address the prevailing wind and the fact that sound carries so considerable we would request that all speakers and sources of music and MCs be directed towards the south west with no speakers on the perimeter fencing on the A20. I think that a finish time, for broadcasted sound, of midnight, in both the Main Arena and the Campsite, would be more acceptable for local residents and that anything after that should be in the form of a "Silent Disco", i.e. use of individual Wi-Fi Headphones.
3. Traffic Management. Southbeats Ltd. have employed SEP, a very experienced Traffic Management Company, but they seem to be making assumptions that have not yet been confirmed. For example, they have said that the employment of frequent shuttle buses to the local train station will reduce the need for large numbers of private cars. However, they will not be agreeing additional trains, especially late night trains, with the train operator until the end of May, or later. What are their contingency plans if they cannot get the extra trains or do not know if there are emergency engineering works held during the event? Also, the Shuttle Buses and Coaches are planned to operate from a field located just off the A20 and alongside Terry's Lodge Lane. There are planned "In" and "Out" Entrances but currently there is no existing gap in the fencing for the "Out" Exit. Will Southbeats get permission for an additional gate onto a very narrow lane with restricted site lines? Coaches and buses entering and leaving Terry's Lodge Lane are likely to cause considerable disruption in this very narrow lane, also just before a bend. The planned field floods in periods of prolonged rain and the ground becomes very soft and entirely unsuitable for HGVs in periods of normal rainfall. What will SEP's contingency plans be if the field cannot be used? It can only mean many coaches milling around on the main A20, a very dangerous situation.

4. On investigation we have discovered that there were a number of violent incidents during last year's Southbeats Festival at Port Lympne. The organisers have stressed that they are employing the services of a professional security company. When residents asked would there be any Kent Constabulary officers either at the sight, controlling traffic or generally specially available should there be any incidents likely to cause injury or damage to locals or their property, we were unsure as to the answer. I think this is probably essential but regret that this would put a strain on local police resources which are severely challenged. I also think this should be imperative at the local Borough Green railway station and Swanley railway station. Also it should be considered what is likely to happen if thousands of revellers are delivered to the stations late at night, when no trains are available. At present the train service is one per hour at night on Sunday and Saturday. This could cause a very unpleasant situation.

Please ensure that this email is included with objections to this application. Many thanks.

Mrs. D. Allgood
Resident of Wrotham Hill Road

Anthony Garnett

From: Geoffrey Allgood [REDACTED]
Sent: 09 May 2019 21:18
To: Licensing Services
Subject: Re: Southbeats Festival of SBE Live Ltd, - Application dated 9 April 2019
Categories: Anthony

As requested my full address is:-

G J Allgood
 [REDACTED]
 Wrotham
 Kent TN15 7 PU

Sent from my iPad

On 9 May 2019, at 13:29, Licensing Services <Licensing.Services@tmbc.gov.uk> wrote:

Dear Mr Allgood,

Thank you for your Representation – In order to make it valid under the Licensing Act 2003, could you please confirm your address please.

Regards

Licensing Team.

From: Geoffrey Allgood [REDACTED]
Sent: 07 May 2019 21:24
To: Licensing Services <Licensing.Services@tmbc.gov.uk>
Subject: Southbeats Festival of SBE Live Ltd, - Application dated 9 April 2019

See attached Application Notice.

I would like to object to this Application regarding:-

1. Application states, ".....for a period of 5 days each year." Why is this an "Open" Application? Surely for such a large, locally disruptive Event there should be an Application for each Event. Southbeats have already said that they expect the Event to grow in size each year.
2. Application states, "Films, Live Music, Recorded Music, Supply of Alcohol 11.00 – 02.00." The site is very open, situated on top of a hill in a quiet, rural location. I live over a mile away, in a straight line, from the site and from my experience of past Events held on this site any sound can travel a great distance. To minimise the disruption caused by the sound travelling I suggest that all sources of live and recorded sound should be directed away from the local houses, i.e. to the west over the M20, Also I think that a finish time, for broadcasted sound, of 00.00, in both the Main Arena and the Campsite, might be more acceptable for local residents and that anything after that should be in the form of a "Silent Disco", i.e. use of individual Wi-Fi Headphones.

- 3. Traffic Management. Southbeats Ltd. have employed SEP, a very experienced Traffic Management Company, but they seem to be making assumptions that have not yet been confirmed. For example, they have said that the employment of frequent shuttle buses to the local train station will reduce the need for large numbers of private cars. However, they will not be agreeing additional trains, especially late night trains, with the train operator until the end of May, or later. What are their contingency plans if they cannot get the extra trains or there are emergency engineering works held during the event? Also, the Shuttle Buses and Coaches are planned to operate from a field located just off the A20 and alongside Terry's Lodge Lane. There are planned "In" and "Out" Entrances but currently there is no existing gap in the fencing for the "Out" Exit. Will Southbeats get permission for an additional gate onto a very narrow lane with restricted sitelines? Also, the particular field in question is very prone to deep flooding in periods of prolonged rain and the ground becomes very soft and entirely unsuitable for HGVs in periods of normal rainfall. What will SEP's contingency plans be if the field cannot be used? It can only mean many coaches milling around on the main A20, a very dangerous situation.

Mr G. Allgood
 Wrotham Hill Road

Have you tried contacting us at www.tmbc.gov.uk/do-it-online ?

This e-mail may contain information which is sensitive, confidential, or protectively marked up to OFFICIAL-SENSITIVE level and should be handled accordingly. If you are not the intended recipient of this e-mail or any part of it, please inform the sender immediately on receipt and do not copy it or disclose the contents to any other person. All e-mail traffic may be subject to recording and/or monitoring in accordance with relevant legislation.

Anthony Garnett

From: clerk@trottsicliffepc.co.uk
Sent: 09 May 2019 23:15
To: Licensing Services
Subject: Re: 19/0046/PREM - Southbeats Music Festival at Wrotham Hill

Categories: Anthony

Dear Leeann

At the Parish Council meeting for Trottscliffe held this evening Members resolved to object to the above proposal. Members are concerned about the levels of noise and the effect this will have on family life with reference to safeguarding children in the area. Other concerns include the effect on the air quality as the local roads will become congested. The proposal will have an adverse on local roads and the environment. The site is very close to a major exit/entrance to the M20 and local roads are already affected by the roadworks on the M20 which will be exaceberated by this proposal. Members feel that the size of the proposed event is not suitable for such a rural location.

Kind regards

Louise Goldsmith

Clerk to Trottscliffe Parish Council

Anthony Garnett

From: Louise Goldsmith <clerk@addingtonpc.onmicrosoft.com>
Sent: 09 May 2019 23:23
To: Licensing Services
Subject: 19/0046/PREM - Southbeats Music Festival at Wrotham Hill

Categories: Anthony

Dear Leeann

>

> At the Parish Council meeting for Addington held yesterday Members resolved to object to the above proposal. Members are concerned about the levels of noise and the effect this will have on residents and in particular families in the area. Other concerns include the effect on the air quality as the local roads will become congested. The proposal will have an adverse on local roads and the environment. The site is very close to a major exit/entrance to the M20 and local roads are already affected by the roadworks on the M20 which will be exaceberated by this proposal. Members feel that the size of the proposed event is not suitable for such a rural location. Members are also concerned about the levels of police presence that will be required and that this will affect the service in the local area for the duration of the event. Members would not like this to be an annual event.

>

> Kind regards

>

>

> Louise Goldsmith

>

> Clerk to Addington Parish Council

Ms Wendy Palmer,



Wrotham

Sevenoaks

Kent

TN15 6NN

9/5/19

Comment on Licensing Application 19/00461/PREM

Wings of the Morning- Southbeats Event.

Dear Sir/ Madam,

I would like to object to the issuing of a licence for the above event on the following grounds The Prevention of Public nuisance and Promotion of Public safety

I will use a recent event at the same site as a benchmark example:

Noise Nuisance

This application asks for music, live and recorded, for 4 days from 11.00 am until 2am and an additional hour for 'late night refreshments' until 3am. This music will be well over 150db from stacks of speakers. This will be a complete intrusion on the lives of all the local residents for an unacceptable duration.

As a benchmark I live approx. $\frac{3}{4}$ mile from the site. This past weekend a Spartan race event took place. This is a cross country event attracting 1,000-2,000 people spread over the weekend. (Compared to the 15,000 expected at Southbeats for the whole event.) The Spartan event **only** used 1 PA unit to call people to the start of each race. However, I could hear every word clearly from my property.

The nuisance of music, at that volume, for 4 days, 13-14 hours a day is Public Nuisance.

Public Safety

The application requires sales of alcohol for 13 hours a day leading to inevitable drunken behaviour by event goers over 4 days causing extra stress on NHS services looking after the fall out from the event and not being able to attend local emergencies.

In addition to the Noise nuisance there is the additional Public safety concern of traffic on roads leading to the site and the lanes surrounding the site.

The A20 leading past the site struggled with the relatively small number of vehicles attending the Spartan event. Leading to tail backs in both directions, down Wrotham Hill and towards West Kingsdown. No matter how many buses the organiser says they will lay on from stations the majority

of spectators will arrive by car. When the A20 has hold ups the inevitable happens, drivers either going to the event or just trying to live their lives, take to the lanes surrounding the site. This leads to the lanes becoming dangerous rat runs. Even with the relatively small Spartan event, I had to take my life in my hands trying to exit my property, with traffic traveling at a speed and density of the A25 at rush hour to avoid the queues caused at the site.

The slip road that exits the M20 feeds onto a roundabout directly next to the site. Any tailbacks will quickly build up along the slip road and cause a queue on to the M20 which will put any vehicle in the tailback at risk.

Safety of Young People

Events of this nature will attract drug dealers to the area. This availability of drugs to the young people of the area may encourage more to become involved in the drug society.

I DO NOT believe that this is a suitable site for an event of this size, duration or type. I also DO NOT believe that any licence should be issued for 5 yrs for an event of this nature. This is the third site that this event has been in. Why have they not returned to pervious sites if they have been such successful, well run events.

Your Sincerely

Wendy Palmer

Borough Councillor for Borough Green and Long Mill.

Comments on the Traffic Management Plan for Southbeats Music Festival

My name is Peter Gillin and I have been an organiser and a marshal of the Wrotham Steam and Transport Rally, a community based charity, for the last 15 years. It has mainly been a 2-day event that takes place on the Wings of the Morning Field in Wrotham in the summer, the same field where the Southbeats Music Festival is proposed. The rally attracts around 800 exhibitors including classic cars, commercial vehicles, busses, coaches and military vehicles.

The field benefits from relatively flat topography and the ground is characterised by heavy clay over a chalk sub-strata. As a result it becomes slippery when wet from morning dew or rain. Persistent use by vehicles in damp conditions causes the grass cover to cut up causing heavy vehicles to lose traction with resultant wheel spinning that digs further into the clay.

The rally has a number of strategies to combat this problem including initial applications of straw, traction pads to insert beneath wheels and ultimately a range of tractors for towing. The ultimate strategy is a caterpillar-equipped all terrain vehicle with steel blades on each segment of the caterpillar track, which has been used to haul a steam traction engine out of the rut when it floundered in heavy rain.

All of the above problems have been experienced on the relatively flat ground of Wings of the Morning Field. Southbeats Festival is proposing to use Terrys Lodge Field ("TLF") as the main parking area, which has considerably more difficult topography and the same heavy clay over chalk.

The Google Earth section that runs parallel to the A20 indicates variations in height of 7m in a distance of 190m. From the entrance, GV1, there is an immediate and significant slope downwards and as the proposed roadway turns south to run parallel with Terrys Lodge Road there is a negative camber that would result in a tipping force away from the road which would be particularly significant for the proposed double decker busses operating the Pick Up Drop Off ("PUDO") service.

With my long experience of marshalling large vehicles on the Wings Field I consider that the topography of TLF is unsuitable for fully laden coaches and particularly the double decker busses that will operate the PUDO. It is proposed that the frequency of the shuttle service is 10 buses per hour with a capacity of 92 persons per bus. That would require sitting and standing passengers on both decks, which is dangerous and unrealistic. With one arriving every 6 minutes there is no contingency for error.

As the main substrata is chalk then the only way to change the roadway camber is by the import of significant quantities of hardcore to bank up the roadway to the east. This would impact on vehicles seeking to leave the roadway in the easterly direction, thereby reducing the capacity of the main car park significantly. There is no mention of banking in

the Transport Management Plan so presumably the busses and coaches are expected to negotiate the negative camber and slope as is.

In the event of inclement wet weather then the slippery slopes not covered by roadway, which is most of the TLF surface will lose grip and then most vehicles other than 4x4's will be prone to losing traction on the slopes.

I consider that the most likely event is that none of the double decker busses and coaches will use the TLF and since Terrys Lodge Road becomes progressively narrower the further from the A20 it gets, then most coaches and busses will be forced to alight on the A20 which will cause traffic chaos and negate any semblance of parking management.

The proposed egress GV2 does not currently exist and because Terrys Lodge Road is classified as C31 by Kent Highways, a planning application will need to be consented for the event to take place. This will give an opportunity for the safety of the egress to be fully explored when scaled drawings of the proposal will be available and adequate sight lines demonstrated. It is not currently clear that this will be possible as the sight line to the north of the egress is poor. No evidence has been presented as to how the egress can be designed to be compliant with Kent Highways requirements.

I consider that it is very important that the Event License is only granted when it has been demonstrated that the egress is safe to use from a Highways perspective by the planning application being consented.

The entrance GV16 on the A20 is to the parking for the camping field. Currently it is a dilapidated and overgrown gate that hasn't been used in years with a water hydrant immediately outside on the A20 margin. The Traffic Management Plan gives no indication of the events plans to make the entrance safe and serviceable and to ensure that the water hydrant is protected from damage and accessible to emergency vehicles throughout the event.

In conclusion the proposal to use TLF as a suitable car park for the bulk of the event, including cars and coaches and double decker buses for PUDO is miss conceived on a good weather day and impossible in inclement weather resulting in an unsafe event. The Traffic Management Plan does not identify inherent safety issues or attempt to provide credible, safe solutions.

Peter Gillin
Wrotham Steam & Transport Rally
Organiser and Marshall for 15 years
Chairman, Wrotham Parish Council

7 May 2019

WROTHAM PARISH COUNCIL & STANSTED PARISH COUNCIL
HIGHWAYS TECHNICAL APPRAISAL FOR PREMISES LICENSE
APPLICATION SOUTHBEATS FESTIVAL 2019



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1.0 Introduction

- 1.1 Les Henry Associates Limited have been instructed by Wrotham and Stansted Parish Councils to provide this Technical Appraisal of the proposed premises licence for the Southbeats 2019 music festival on the Wings of the Morning site, Wrotham Hill, Wrotham, TN15 7NS
- 1.2 My name is Leslie James Henry. I am an Incorporated Engineer, a Fellow of the Institute of Highway Engineers and a Member of the Chartered Institution of Highways and Transportation.
- 1.3 I have been involved in highway and traffic engineering issues for over 35 years in connection with new development and road safety schemes within both the private and public sector.
- 1.4 I have assisted numerous Parish Councils in this area of Kent in respect many development proposals and highway improvement schemes since 2007 when I represented them and supported objections at the Borough Green Bypass Public Inquiry. I have also assisted numerous Parish Councils with some highway related proposals.
- 1.5 This Technical Assessment identifies several problems associated with the proposals in terms of the proposed site layout, access locations, existing highways layout, signage, visibility, traffic management, transportation, and the impact of the proposals on the local and adjoining highway network.
- 1.6 The report is produced in support of the objections raised by Wrotham and Stanstead Parish Councils.

2.0 Site, Highway and Transport Characteristics

- 2.1 The proposal site lies to the north of the M20 motorway, to the south of A20 London Road and to the east of C31 Terry's Lodge Road.
- 2.2 The Parishes of Stansted and Wrotham lie to the north and east respectively.



Figure 1: Site Location Plan

- 2.3 Wrotham and Stansted are connected to the road network with access to the M20 and M26 via the A20.
- 2.4 Additionally, Borough Green and Wrotham Railway Station to the south provides services to London Victoria, London Blackfriars and east Kent.
- 2.5 It is possible to board 7 bus services close to Borough Green and Wrotham railway station which provide relatively limited services throughout the day to surrounding towns and villages.

Highways Technical appraisal for Premises License Application – Southbeats 2019

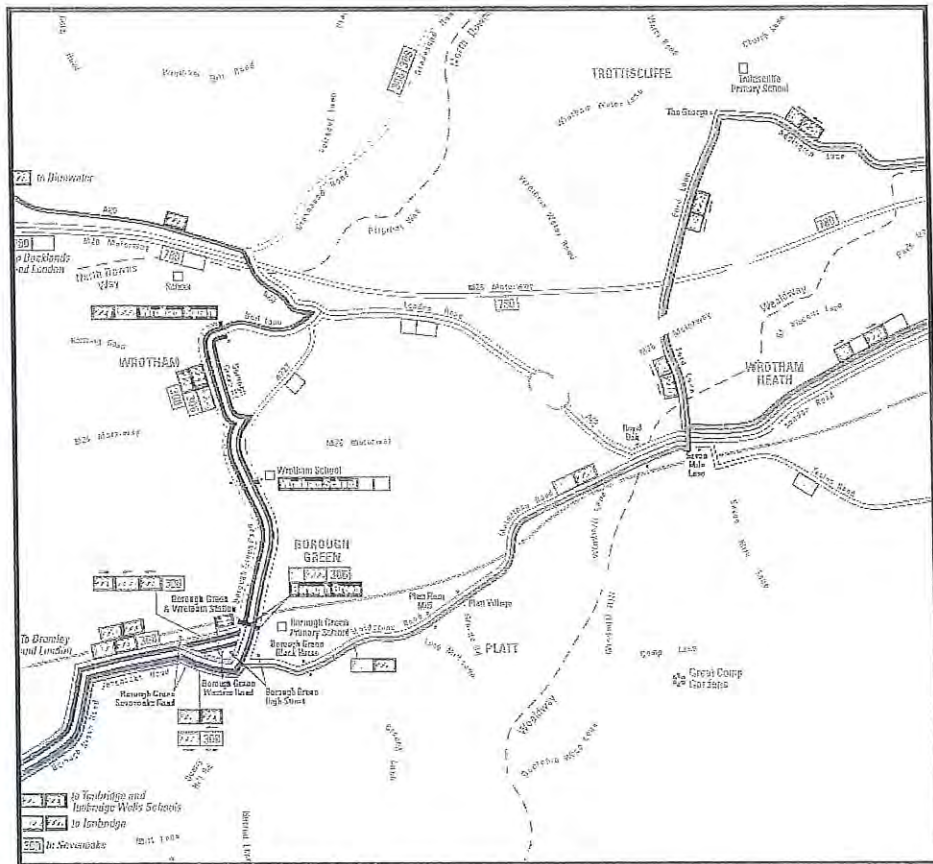


Figure 2: Local Bus Services

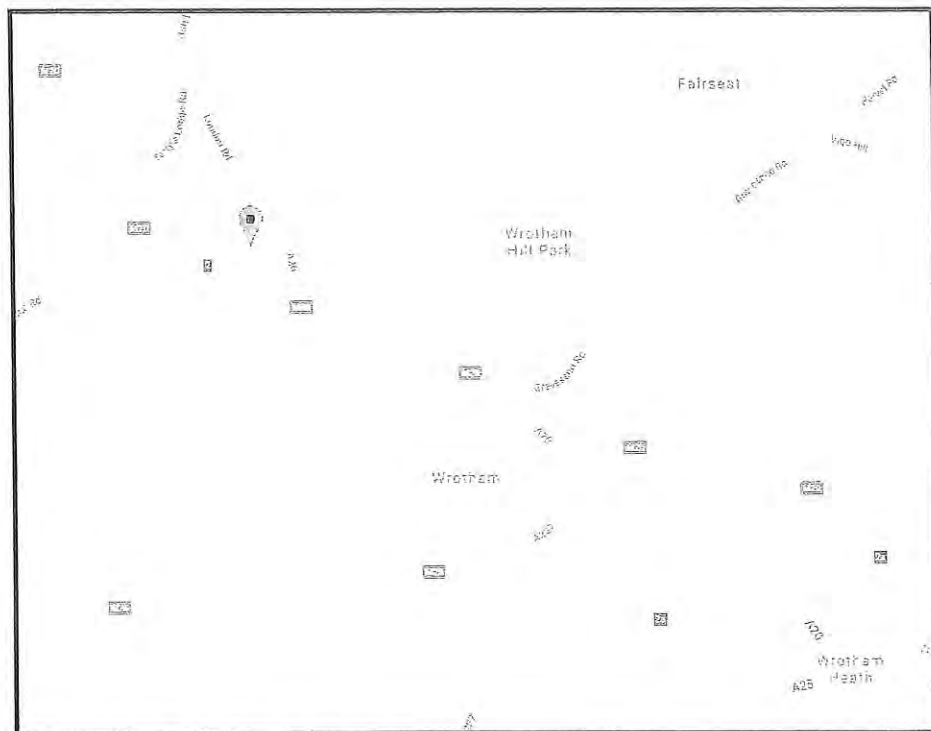


Figure 3: Highway Context Plan

3.0 The Proposals

- 3.1 The proposals are for premises licence for a Music Festival with an attendance of up to 14,999 people for up to 5 days per year.
- 3.2 The event has been held on two occasions previously.
- 3.3. The application is supported by a Transport Management Plan (TMP) which sets out four main objectives as follows: -
- i. The maintenance of public safety on the local highway infrastructure;
 - ii. Minimise disruption to all road users with special emphasis on maintaining the integrity of those routes which act as alternatives to the strategic trunk road network;
 - iii. Minimise disruption and impact of such an event on local communities; and
 - iv. Optimise the experience of visitors to the event.
- 3.4 It is suggested signs would be erected in the vicinity of the site from 9th September 2019 to provide advance warning of the proposed event informing members of the public of possible delays and road closures.
- 3.5 Routes to and from the site and for emergency vehicles are indicated at section 3 of the TMP.
- 3.6 Section 4 sets out the car parking capacity and suggests 500 cars would arrive for the weekend and take advantage of camping facilities and a further 500 cars would arrive daily amounting to 2,500 and 1,500 people respectively. There is no indication of the number of people involved in the production of the event, but it is suggested a further 8,000 would arrive via 50 coaches, 90 shuttles and taxis.
- 3.7 It is suggested the daily parking and coach/shuttles would enter the site via the existing access at the northern end of Terry's Lodge Road and egress the site via a new vehicular access and the southern end of the Terry's Lodge Road boundary. This alternative access would, however, require planning permission as it would be a new access onto a classified road.
- 3.8 Vehicles would be directed to exit the venue via the same route as their arrival.
- 3.9 A reduced speed limit of 30mph is promoted on A20 London Road between its junctions with Ash Lane and the roundabout at junction 2 of the M20 however, dates and timings are to be confirmed.
- 3.10 A no waiting zone is also promoted which would extend along A20 London Road between junction 2 of the M20 and the junction with Stanstead Lane to the northwest. In addition, the restrictions would extend into Ash lane for 250m and into Terry's Lodge Road for a distance of 500m. It is, however, unclear how this would be operated or enforced.

Highways Technical appraisal for Premises License Application – Southbeats 2019

- 3.11 Temporary traffic signals would be provided at the junction of A20 London Road and Terry's Lodge Road and at the production site entrance toward the eastern end of the site boundary with the A20 London Road.
- 3.12 It is stated that all signs will be manufactured in accordance with Chapter Eight Guidelines and erected in accordance with the New Roads and Street Works Act 1991, but the inclusion of a road works sign at the temporary signals is wrong.

4.0 Highways Implications

- 4.1 The proposals would generate a considerable level of vehicular traffic and demand for car parking.
- 4.2 It is generally accepted that most people travelling to events such as music festivals do so by car due to the venue location, need to carry luggage and convenience.
- 4.3 If it is assumed the full attendance that would be permitted under the proposed licence (14,999), 60% of these arrive by car and there are 3 people per vehicle there would be a peak demand for 3,000 cars to park.
- 4.4 The proposals as set out in the Transport Management Plan (TMP) would only make provision for between approximately 1960 and 2690 cars to park which would lead to an overspill in car parking of between approximately 310 and 1040 cars.
- 4.5 The potential overspill in car parking would have a significant impact on highway capacity and safety and have significant impacts of the amenities enjoyed by local residents and businesses.
- 4.6 The TMP purports to providing some means of alleviating car parking demand by the provision of 50 coaches and 90 shuttle services but there is no indication of the passenger capacity of these vehicles and how they would operate. It is therefore impossible to assess the impact of the traffic associated with the proposals on the local highway network.
- 4.7 Furthermore, the gradients across the main drop off and pick up car parking area and the area that would be used for coaches and shuttles are quite steep and therefore I would raise concern over the suitability of using coaches or double deck buses in this area, particularly at times of inclement weather.
- 4.8 Terry's Lodge Road whilst being a classified road is quite narrow and two-way car traffic can only safely pass at relatively low speed. The use of this route for coaches and buses would have significant implications for other road users which often include cyclists and pedestrians.
- 4.9 The proposed additional access onto Terry's Lodge Road will require planning permission as it is an access onto a classified road (C31). Visibility and the likely usage of the access will need to be taken into account when considering the planning application.
- 4.10 The proposed access and egress routes to this area of car parking are likely to give rise to considerable traffic congestion due to the numbers of vehicles involved, the narrow width of carriageway, the inclusion of the use of buses and coaches and the use of temporary traffic signals at the junction of A20 London Road with Terry's Lodge Road.

- 4.11 The provision of 2 sets of temporary traffic signals during the event will give rise to considerable vehicular congestion alone. The inclusion of a significant level of additional traffic will exacerbate this situation and cause considerable queuing in the area which will no doubt affect junction 2 of the M20 motorway.
- 4.12 The TMP promotes a reduced speed limit between the junction 2 of the M20 and the junction of A20 London Road with Ash Lane but it is unclear how this would be implemented or enforced.
- 4.13 In addition, the TMP promotes a “No waiting” area but there is no indication of how this would be implemented, managed or enforced. (i.e. How would local residents be identified?).
- 4.14 Any additional and temporary signs should be provided in accordance with the Traffic Signs and General Directions and not Chapter 8 or the New Roads and Street Works Act.
- 4.15 The provision of additional signage, waiting restrictions, reduced speed limits and road closures should all be agreed with the Highway Authority but there is little indication that any such permissions have been sought or any approvals granted.

5.0 Conclusions

- 5.1 The proposals for a music festival with a capacity for 14,999 people at Wings of the Morning site, Wrotham Hill, Wrotham, TN15 7NS would have a considerable impact on the local area in terms of highway capacity, safety and congestion.
- 5.2 The Transport Management Plan produced in support of the application for a premises license includes sections relating to proposed routes, traffic management, car parking restrictions, temporary traffic signal control and the use of coaches and shuttles but does not provide any details.
- 5.3 The location of the parking for coaches and shuttles is unacceptable in terms of the access egress arrangements and there are some serious doubts over safety because of the gradients across the site and the use of double decked buses.
- 5.4 The impact of the proposals on the highway network have not been assessed and therefore it is extremely likely that there will be significant implications for highway safety in the locality and on the M20 motorway.
- 5.5 There is little indication the applicant has made any contact with the Highway Authority in respect of the various traffic management measures proposed in the TMP and whether any permissions have been granted/agreed.
- 5.6 The proposals should not therefore receive a license until such measures have been fully explored and agreed with the Highway Authority (Kent County Council).

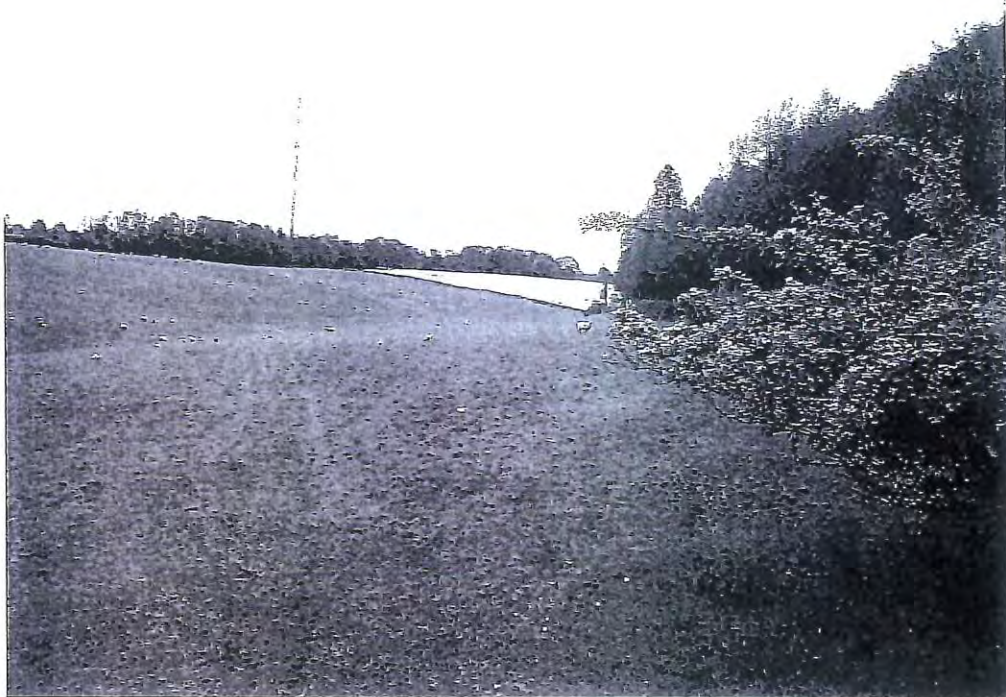
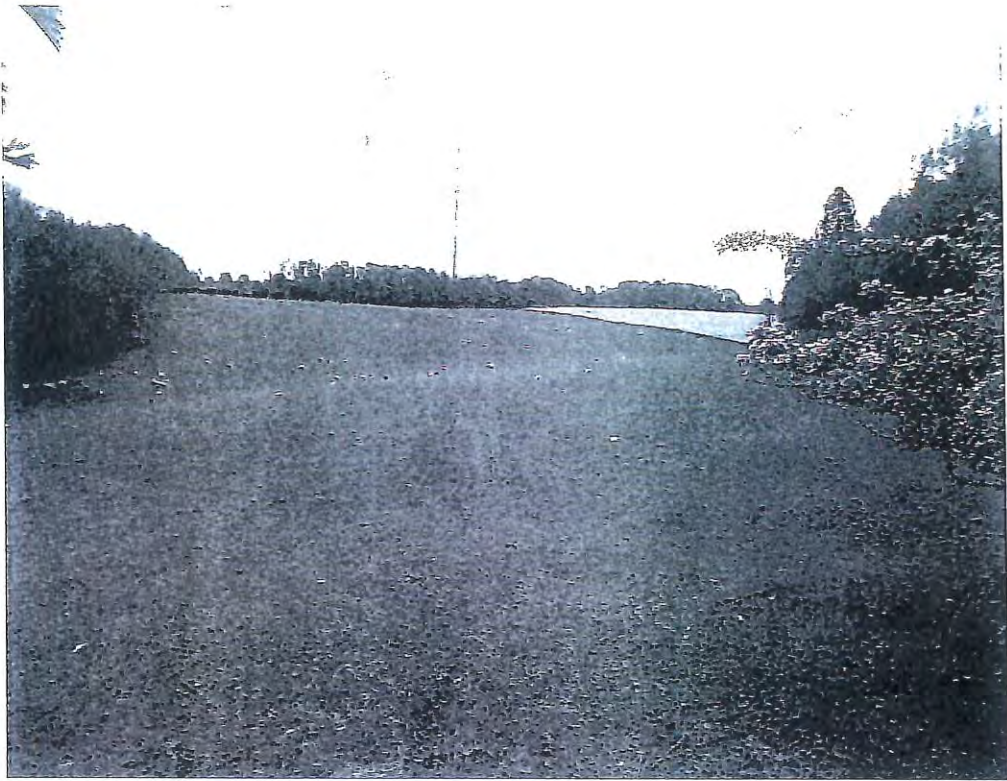
APPENDIX A

Photographs of Terry's Lodge Road and the Car Parking Area

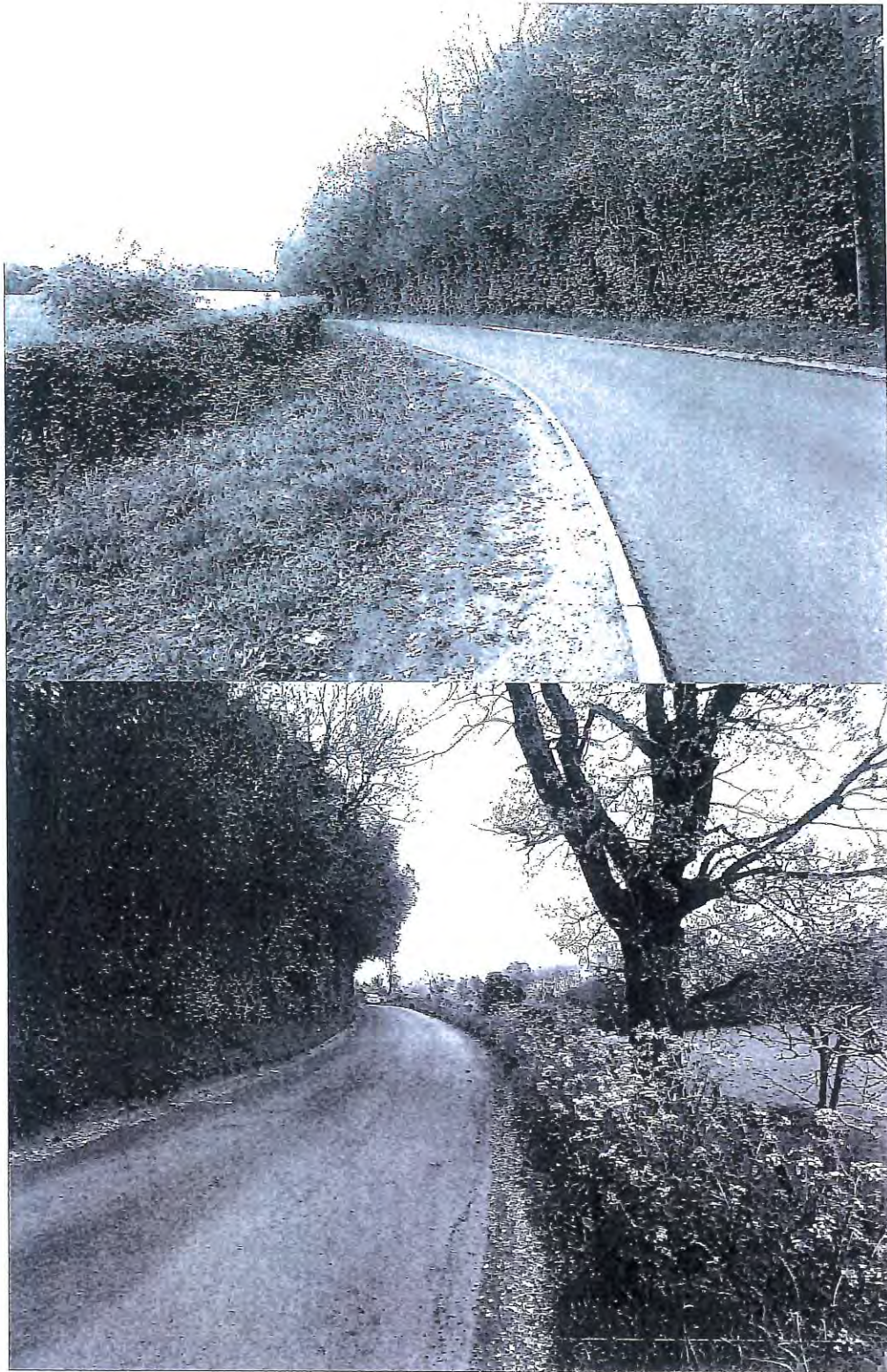
Highways Technical appraisal for Premises License Application – Southbeats 2019



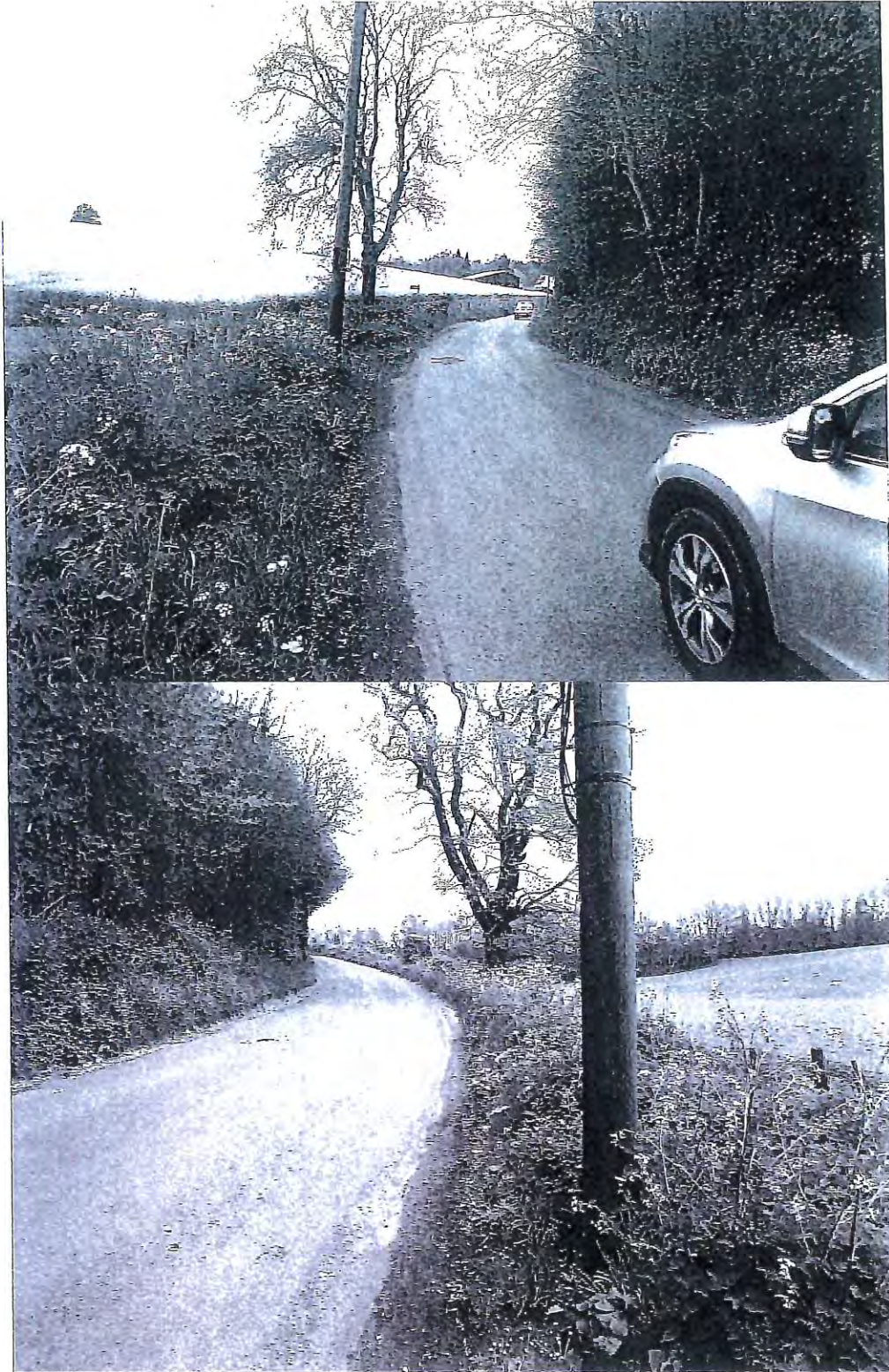
Highways Technical appraisal for Premises License Application – Southbeats 2019



Highways Technical appraisal for Premises License Application – Southbeats 2019



Highways Technical appraisal for Premises License Application – Southbeats 2019



Highways Technical appraisal for Premises License Application – Southbeats 2019



Anthony Garnett

From: Maria Brown
Sent: 15 April 2019 16:49
To: Licensing Services
Cc: Planning Applications
Subject: RE: 19/00873/LINF (MLB) Southbeats Festival

Categories: Leeann

Dear Leeann


Southbeats Festival application

The use of land for a temporary purpose or the installation of moveable structures for a limited period are likely to fall within Classes A and/or B of Part 4 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015. This means that planning permission is unlikely to be required for this use.

Kind regards

Maria

Maria Brown
 Senior Planning Officer
 Tonbridge and Malling Borough Council


 maria.brown@tmbc.gov.uk

Have you tried contacting us at
www.tmbc.gov.uk/do-it-online?

From: Leeann Leeds
Sent: 09 April 2019 16:36
To: environmental protection <environmental.protection@tmbc.gov.uk>; foodandsafety <foodandsafety@tmbc.gov.uk>; Home Office <Alcohol@homeoffice.gsi.gov.uk>; Kent Fire and Rescue <tfs.midgroup@kent.fire-uk.org>; Planning Applications <planning.applications@tmbc.gov.uk>; Police Licensing <west.division.licensing@kent.pnn.police.uk>; Social Services <KSCB@kent.gov.uk>; Trading standards <trading_standards@kent.gov.uk>
Subject: 19/00873/LINF (MLB) Southbeats Festival

Good afternoon,

Please find attached the application for the above, **last day for comments will be 9th May 2019.**

Additionally there are a number of documents (see list below) that have been submitted to the Safety advisory group. Should you wish to see these (if not a member of SAG) please let me know and I will forward these on to you.

Appendix 1: Event Profile

Appendix 2: Event Management Structure

Appendix 3: Event License

Appendix 4: Event Insurance

Appendix 5: Site Plan

Anthony Garnett

From: Emma Keefe
Sent: 09 May 2019 10:16
To: Anthony Garnett
Subject: Southbeats Festival

Hi Anthony,



Response from the LPA:

Class B, Part 4, Schedule 2 of the Town and Country Planning (General Permitted Development) Order (England) 2015 (as amended) effectively grants planning permission for the following:

The use of any land for any purpose for **not more than 28 days in total in any calendar year**, of which not more than 14 days in total may be for the purposes referred to in paragraph B.2, **and the provision on the land of any moveable structure for the purposes of the permitted use.** [my emphasis added]

Having regard to the exceptions and limitations provided for at paragraph B2, it is my view that the use for which the license is sought can be said to fall within the provisions of Class B, Part 4. Therefore, planning permission would not be required if the use in question would not take place for more than 28 days in total in any calendar year (and this would not include days taken in setting up or dismantling the event in my opinion as it is the use itself that is referenced here) and the provision of any moveable structures, in this case the main arena etc. – would also be provided for by Class B.

In the event that the provisions, conditions or limitations are exceeded, planning permission would need to be sought from the Local Planning Authority. Such an application would be determined in accordance with the adopted Development Plan unless material planning considerations indicate otherwise. The Development Plan currently in force comprises the TMBCS (September 2007), the DLA DPD (April 2008), the MDE DPD (April 2010) and the saved policies of the TMBLP. The policies contained within the NPPF and the guidance contained within the associated NPPG are material considerations.

Key issues that would form part of any such assessment would be impacts arising in terms of noise and disturbance and matters pertaining to highway safety. This would include the residential amenities of any nearby neighbours but also public amenity in more general terms given the location of the site and its physical relationship to its immediate surroundings.

Anthony Garnett

From: joanne middelboe [REDACTED]
Sent: 08 May 2019 15:35
To: Licensing Services
Subject: Ref: Southbeats license application

Categories: Leeann

Dear Sir/Madam

We wish to object to the licensing application which you are considering for a Southbeats Music Festival in September 2019 in fields which run alongside the A20 at the top of Wrotham Hill using the four criteria that are required for such an application.

We believe that such an event would produce unacceptable levels of car and noise pollution, litter, crime, stress and lack of sleep for the local communities, which include a significant proportion of elderly residents and school children. These school children will also be travelling to school on the Friday and Monday and are likely to be inconvenienced in their journeys, intimidated by the number of festival goers and have their sleep patterns interrupted by the noise.

The period of set-up with stage, security, lighting, catering equipment and toilets etc arriving, as well as technical, sound and light checks for an event of this scale, is likely to be disruptive in itself and have a detrimental effect on the surrounding area and its residences from a health, welfare, safety and environmental point of view.

There will be further public safety and welfare implications for the local community with the arrival of huge numbers of festival goers. They, over a four-day period, will attend a festival where alcohol and loud music will be supplied until the early hours. This event already has a well-documented record of intoxication, drug abuse and violence. Such behaviour does not meet the criteria of the prevention of crime and disorder. Those under the age of entry are likely to congregate in nearby fields to listen and may partake or gain access through the local woods. The event is only a short walk to local schools, play fields and houses and, as such, there are implications for the welfare and safety of the local communities and their properties. The music will be of a type, at a level and over a duration which will be intolerable for people living in the local environs.

It seems unlikely that the festival goers can be effectively managed off site in either a quiet, orderly or safe manner given the numbers involved, the landscape and the location which is next to the A20, the M20, two pedestrian bridges and surrounded by country lanes, often single vehicle wide, which will become rat-runs once queues start backing up. Queues back up on the A20 regularly on a normal weekday at particular times, and that's when there is no accident on the M20. There are many cyclists who use the country lanes and walkers/hikers. It is not a safe site for such an event and will not prevent public nuisance or promote public safety.

The large numbers of coaches and shuttle buses that will be running - many later into the night or even early hours - will be a disturbance to those living locally, as will intoxicated and disorderly festival goers attempting to get home via the small local train stations of Borough Green and Swanley with the risk of vandalism, break-ins and other anti-social behaviour. We do not think these communities are fully aware of the organisers' plans.

Furthermore, the noise, litter and car/coach pollution will also impact on the local wildlife and farm animals which live in fields that are very close to the festival site and can be easily accessed by climbing over fences.

We have considerable concerns about the impact of this event and draw your attention to the fact that it would be moving to its third venue in just four years. The owner of the site lives far enough away not to be affected by any of the implications I have raised above.

We hope that you will consider these objections and make a decision not to grant the licence.

Kind regards

Joanne and Simon Middelboe



Labour in Vain Rd

Stansted

TN15 7NY

Sent from my iPhone

Anthony Garnett

From: Anne-Marie Nelson [REDACTED]
Sent: 08 May 2019 15:46
To: Licensing Services
Cc: Robin Betts; Martin Coffin
Subject: Southbeats Licence - 19th to 23rd September 2019

Categories: Leeann

Dear Licensing Team


I write to object strongly to the application for a licence from Southbeats for music, dancing and alcohol at the top of Wrotham hill from 19th to 23rd September. I object on the grounds of Prevention of crime and disorder, promotion of public safety, prevention of public nuisance and protection of children from harm.

1. Prevention of crime and disorder. Attracting up to 15,000 people - many young - to an open field and making alcohol available for long hours, will inevitably also attract drug dealers and thieves. It is extremely close to London and the South London gangs. There is no way that the police will be able to prevent criminal activity both on the site and in the surrounding areas. This area has absolutely no facilities whatsoever to assist the authorities.
2. Promotion of public safety. The site is off the A20, a fairly wide, single carriageway road, but not in any way designed for the volume of traffic this event will attract added to the normal local traffic. It is a very short distance from the exit slip road from the coast bound direction of the M20. At peak traffic time a dangerous tail back on to the M20 itself could not be prevented. Traffic from the London bound M20 and the M26 funnels on to the A20 some way Southeast of the site. This section of the A20 is regularly overfull if not completely blocked by local traffic at peak times. Therefore this part of the A20 is not suitable for the traffic generated by this kind of event. The situation on the other surrounding roads will be even more dire. The only other roads in the vicinity are small, narrow village roads, where it is often necessary to back into an opening to let a vehicle coming from the other direction pass. The roads are entirely unsuitable for this additional traffic and will be dangerous.
3. Prevention of public nuisance. The most obvious public nuisance will be the noise. At any decibel level likely to be agreed, residents over a large area will be greatly disturbed during the day and kept awake at night. The site is high, the surrounding areas are naturally extremely quiet and with the slightest wind the noise travels a great distance. Even after the official music stops (at an astonishingly late hour) the site will be far from silent, so there will be disturbance throughout all the days and nights of the event. Such nuisance is not allowed even in the centre of London! Residents in this area have no facilities such as are enjoyed in urban areas, but at least they have peace and quiet. But not for the time of the event and indeed for sometime before and after during the preparation and the clearing up. There will inevitably be litter and rubbish such as food waste, drink bottles etc. over a wide area. This will be an additional public nuisance.
4. Protection of children from harm. There is absolutely no way that the organisers can secure the site from under age children getting in, for instance, across adjacent fields, no matter how much security they have on the gate. This site does not have any of the security or infrastructure to prevent under age and vulnerable children gaining entry. What arrangements can be envisaged to protect these children from harm once they are in the site?

I ask the Licensing Authority to reject this application and any similar ones for this site on the above grounds. Residents of Tonbridge and Malling Borough Council look to the Council to offer protection from exploitation by those whose activities are to the detriment of residents.

Yours

Anne-Marie Nelson


 Kemsing
 Sevenoaks
 Kent TN15 6QL

8th May 2019

Dear Sir/Madam

Re: OBJECTION TO APPLICATION for a PREMISES LICENCE

SOUTHBEATS FESTIVAL of LIVE Ltd. Dane John Works, Gordon Road, Canterbury CT1 3PP
 Premises Licence to use premises at Wings of the Morning, Wrotham Hill, Wrotham TN15 7NS;
 from 19/09/2019 and for a period of up to 5 days each year.

I am writing to object most strongly to the above mentioned application.

In accordance with the IAS advice, there are four possible areas of objection to a Premises Licence Application and in my opinion all four have major issues which must surely prevent the music festival taking place. A site so closely situated to the M20 motorway.

1. **Public Safety** With envisaged ticket holders of 15,000/9,000 over the weekend of 21/22 September Borough Green's population of c.5,000 could quadruple, causing chaos in our village and on surrounding roads and footpaths. Our village, and surrounding area, is not designed to cope with such increases in people and traffic. The railway station forecourt already leads up to a busy T-junction and is already difficult to exit, taking into account the recently opened Sainsbury's Store, which has resulted in additional problems in this area anyway. We already have an over stretched traffic flow at pinch points in the village.
2. **Prevention of Crime & Disorder** With alcohol being served on site from 11.00am until 2am the following morning, plus each camping ticket holder being allowed to enter with 24 cans and a litre of spirit or wine, add to this the very high likelihood of drug abuse, it is bound to lead to increased rates of drunken and public disorder. Sadly, in my view, it is a disaster waiting to happen.
3. **Prevention of Public Nuisance** With the anticipated high number of attendees aged 18+ this invariably results in unruly and drunken behaviour causing disturbances for local inhabitants and businesses.
4. **Protection of children from harm** Taking in to account all of the above issues I feel the children of Borough Green should be protected from such a huge event taking place so close to their village with the impact that it will cause.

I would urge Tonbridge & Malling Council to give serious consideration to the licence or otherwise of this application. This event will have serious impact on our local roads, public transport, crime and disorder.

Yours faithfully,



J Elsey (Mrs)


Wrotham Hill Road
Wrotham
Sevenoaks Kent
TN15 7PX
Tel 01732 823918
Fax 01732 823916
E mail gillian@adventurezone.co.uk

TMBC
Licensing Services
Gibson Building
Gibson Drive
Kings Hill
West Malling
Kent ME19 4LZ

9th May 2019

To whom it may concern

I am writing to raise my concerns about the proposed South Beats Festival at Wings of the Morning

19/00461/PR
EM

I have lived here all my life and am very aware of the implications an event like this will have for both Public Nuisance and Public Safety on such a small site

The proposed site whilst adjacent to the A20 is not served by any regular buses nor is close to a railway station. Traffic generated by Brands Hatch leads to massive disruption of local roads despite the big turnout events being well managed and strong traffic measures in place. An event of this scale over three days on such a site with no permanent facilities will lead to serious congestion, access issues and trespass of other properties

Should the weather be poor the ingress and exit from the site will be impossible – there are no permanent trackways and just two small gates to the main site and one to the proposed car park area. It seems highly likely that there will be large numbers of people trying to access the venue over a long period of time via any means possible with only either the narrow local lanes or the

busy A20 to service their needs – the bottlenecks will lead to frustrations and inevitable create a Public Nuisance – both to local residents and the festival goers

Sited where the field is at the top of the hill will also create Noise Nuisance both from the venue and from the surrounding areas as festival goers arrive, try and park in the vicinity, leave the venue or just party where they manage to park up

I urge the council to bear the suitability of this site in mind and refuse the Licence Application

Thank you

Gillian Walton