

Objection to Wings Of the Morning Fields License Application By BJP Production Ltd/ Ma...



Reply Reply All Forward ...

Thu 15/07/2021 18:59

Licensing

Dear Mr Garnett

I have been .are aware of the above apication(s).

This quiet little corner of Kent is entity unsuited to this sort of event and the negative impact on residents is huge.

The infrastructure is entirely unsuited and the noise will cause 1000s if not 10s of 1000s sleepless nights.

The increase to Covid spread in an area with so many aged and vulnerable resident must also not be overlooked.

Please refuse this apication

Kind Regards



DA130DA

Sent from my Galaxy

Objection to Wings of the Morning fields license application by BJP Production Ltd/Matts...


Reply

Reply All

Forward

...

Thu 15/07/2021 19:04

Licensing

Good evening, we should like to object to the above application

1. There have been drug and alcohol related crimes at previous events of this kind in the area.
2. The noise is extremely loud and can prevent sleep in a 1.5 to 2 mile radius. Sleep deprivation is a serious risk to the health and mental wellbeing of local residents. The continuous noise that an event of this type will produce through the daytime as well would be harmful to residents' health.
3. Increased traffic is also a cause for concern.
4. The event will inevitably provoke numerous calls to the police if licensing conditions are disregarded and if offences are being committed. There is a realistic risk of non-compliance with a licensing condition requiring noise and alcohol service to end at a specified time - such conditions have been ignored on previous occasions at events.
5. If TMBC ignores the objections of concerned residents, please will it impose an early evening deadline for ending the music and sale of alcohol and then make arrangements to guarantee police enforcement of such deadline.objec


TN15 7JX
Sent from my iPad

Wings of the morning fields Music Festival



[↩ Reply](#) [↶ Reply All](#) [→ Forward](#) [⋮](#)

Thu 15/07/2021 19:22

Licensing

Dear Mr Garnett

We strongly object to the holding of a Music Festival on the Wings of the morning fields at the top of Wrotham hill. It will cause chaos on the A20 and surrounding roads. The Police will not have the resources to man it, plus alcohol and drug use will cause mayhem. The site is not suitable for such an event , being so close to residential areas etc It needs to be sited completely in the countryside, away from all housing and main roads We are residents in Pilgrims Way Wrotham and as the crow flies its about 600 metres away. The noise will be intolerable.

Yours Faithfully



Objection to Wings Of the Morning Fields License Application By BJP Production Ltd



Reply Reply All Forward ...

Thu 15/07/2021 19:38

Licensing

Dear Mr Garnett,

As a resident of Stansted with 2 young children I have significant concern regarding the application by BJP Production Ltd to hold a number of large events throughout the summer months this year and subsequent years.

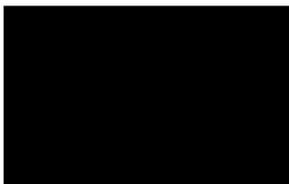
There are a number of concerns I, and my family have.

1. The immediate and long term detrimental impact on the surrounding area and wildlife. Previously events held at this site have caused increased traffic and traffic pollution, and increased litter.
2. The attendance of a significant number of people at the site will impact on traffic flow and the ability to access our own home. There is also the concern of people unaware of the country lanes travelling at speed through the village, posing in particular a risk to my children walking to the local park. Inappropriate parking also increases the risk around the site.
3. Noise pollution affecting farm animal, and humans alike. We chose to live in a quiet rural area, the potential events during the summer months take place when we would like to enjoy sitting in our gardens and when windows and doors will be open at night. Sound carries in this area, and the significant interruption of music, traffic and general noise late into the night would have a disastrous impact on our sleep and that of our children significantly reducing our quality of life.
4. Concern as to whether the police will have the manpower to properly police the event, or be able to respond to other incidents around the area at the same time.

For all these negatives – and I only name a few- I can see no benefit to be gained by the local community to offset these.

We vehemently oppose these events.

Regards



TN15 7PR

Sent from [Mail](#) for Windows 10

Events at wrotham



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Fri 16/07/2021 08:26

Licensing

I would like to lodge my objection to these events as I do not believe the surrounding infrastructure can support the amount of traffic and the number of people who would potentially attend the event.



Objection to Wings Of the Morning Fields License Application By BJP Production Ltd/ Ma...



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Fri 16/07/2021 08:56

Licensing

FAO Anthony Garnett

Dear Sir

I will be grateful if you will take account of my objections to this music event.

1. I fear it will not have an enforced finishing time acceptable to reasonable neighbours, such as midnight,
2. I fear that the behaviour of certain attendees will be uncivilised, troubling to the local communities,
3. I fear that the strain on the forces of law and order will be greater than they can cope with.

Kind regards



TN15 7LE

Objection to Wings of the Morning Fields License Application by BJP production



[↩ Reply](#) [↩ Reply All](#) [→ Forward](#) [⋮](#)

Fri 16/07/2021 11:18

Dear Mr Garnett,

I wish to object to the above application.

I understand that this has multiple applications not just for the one event on the 14th August 2021.

I was involved with other local people in raising objections to the SouthBeats application in 2019.

I have similar concerns as I had then. The impact on our local community of having large numbers of people with increased traffic. that there would be disruption to our local amenities with the possibility that emergency vehicles would not be able to quickly access our homes if needed.

In addition there is the environmental consideration of noise and light pollution and littering.

As with my previous objection I wish to have my postcode included but not my name or house name.

Kind regards



Re: Premises application for Matts BBQ 2021 - Wings of the Morning Field, Wrotham

 Reply

Reply All

Forward

...

Fri 16/07/2021 23:50

Licensing

Wings of the Morning Field PRoW.pdf
.pdf FileTemporary Closures - Public Rights of Way.pdf
.pdf File

Dear Mr Garnett

Thank you for your email below. I write on my own behalf as a Member of Kent County Council and as a Member of Wrotham Parish Council.

The site is wholly within my Electoral Division which includes the parishes of Stansted and Wrotham

I write to object to the Application by BJP Productions Ltd. (BJP) and or Matts Bar B Q under the Licensing Act 2003 to the Licensing Authority Tonbridge & Malling Borough Council for an event on 14th August 2021 in the location above, which requires to be licensed.

Under the Revised Guidance Under Section 182 of the Licensing Act 2003 issued by the Home Office an applicant is required to demonstrate that any event requiring a license meets four Licensing Objectives.

In the application the applicant BJP, makes reference on page 18 at para 3.2 to The Prevention of Crime & Disorder and makes further reference to the deployment of staff including SIA licensed teams. BJP and or its agents have failed to make a timely application to the local Highway Authority to close either footpath MR 223 or bridleway MR224. I attach confirmation of this fact by way of a copy email from William Barfoot of the KCC Footpaths Team. The Applicant has not taken into account either right of way and is thus unable to prevent either illicit drugs or alcohol, from entering the site based upon the plans and drawing contained in the application. As a result, the Applicant is unable to meet its obligations requiring the prevention of crime and disorder.

The same situation applies to public safety. Both the public footpath and the bridleway referred to above run through the site both in the east and in the west running roughly north to south. The accesses and egresses to MR 223 and MR224 through the site have clearly not been considered and the applicants have not taken into account the fact that the bridleway is so close to the sound stages, that the noise levels will undoubtedly prove a potential hazard for those lawfully using the public bridleway for equestrian purposes. KCC as the Highway Authority has written to confirm that it is now too late for the applicant to arrange to close either public right of way. The activities requested under the license clearly represent an unacceptable risk to those using the bridleway whilst riding.

The rights of way to which I make reference, are open to the general public as a right. The applicants have left it too late to apply for closure. As the application stands there is nothing to prevent anyone accessing the site, with or without tickets, because there is an absolute right to use public rights of way unless the highway authority have taken the required steps to close.

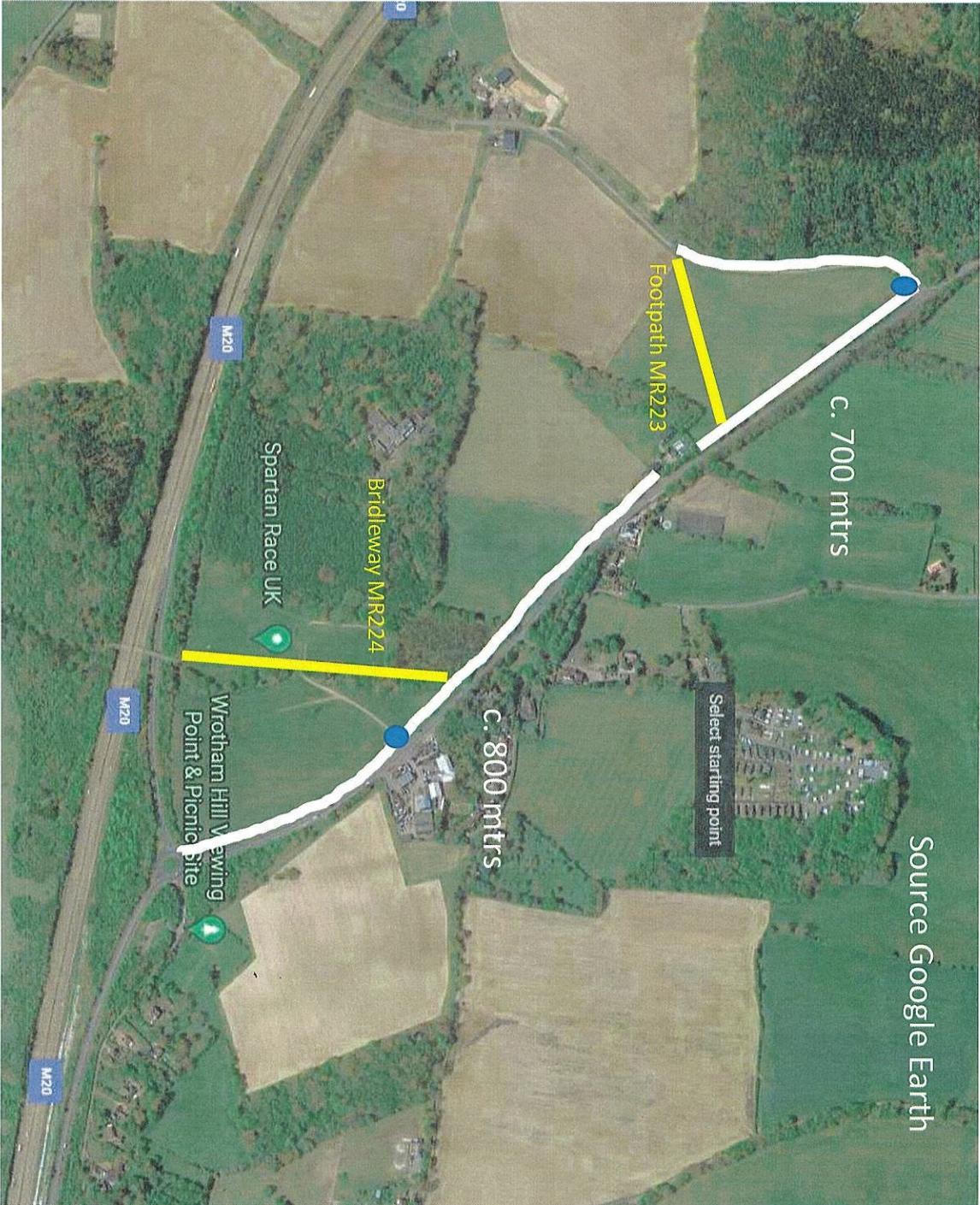
The failure of the applicant to apply for the timely closure of the public rights of way, will provide the opportunity for public nuisance by those who may take the opportunity presented by the failure of the applicants to close the public rights of way. This represents the failure of the Applicant in their duty to prevent public nuisance.

With public rights of way crossing the site and no recognition by the applicant it is clear that they cannot under the existing application make adequate provision to prevent those under 18 years from lawfully entering the site with or without tickets on the basis of the plans presented under the current license application. Please find attached a Google Earth Map showing the public rights of way in yellow.

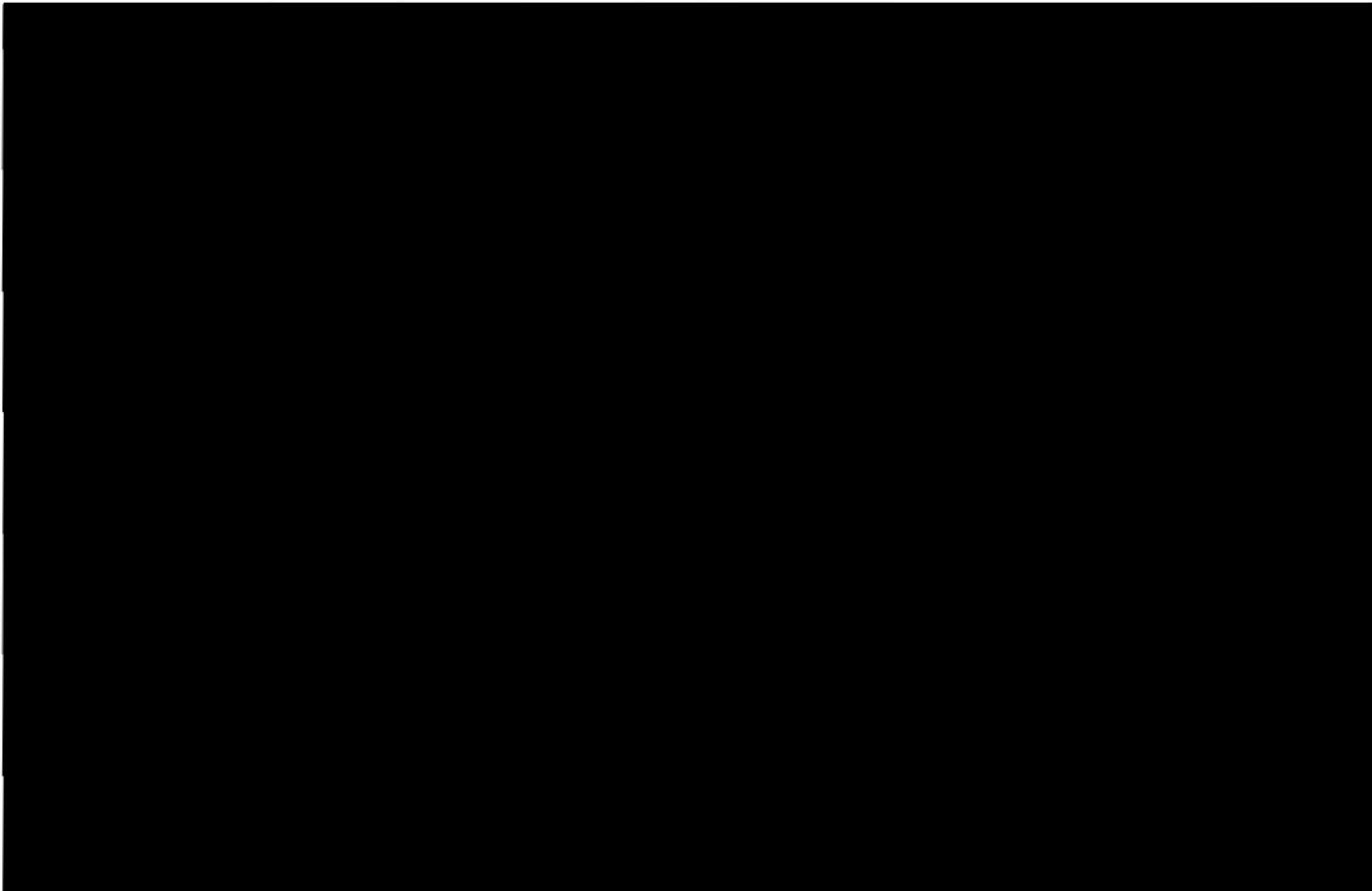
Regards



County Member, Malling West



RE: Temporary Closures - Public Rights of Way



From: [Redacted]
Sent: 15 July 2021 10:17
To: [Redacted]
Cc: [Redacted]
Subject: RE: Temporary Closures - Public Rights of Way

Dear Mr [Redacted]

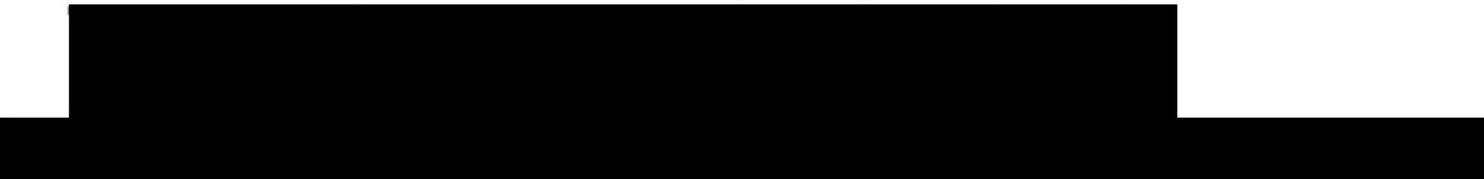
I can confirm our policy for event closures of the PROW Network is as laid out in the attached documents that Graham had previously sent.

As you can see there is a requirement to advertise in the local press one month prior to the event. It appears the event is proposed on the 14th August. Due to press deadlines we would not be able to get a notice into the press until the 23rd July at the earliest. As such this element of the policy could not be met even if we were to receive such an application today.

Kind Regards

[Redacted] | Definitive Map Team | PROW & Access | Countryside and Community Development
| Growth, Environment & Transport | Kent County Council | Invicta House, Maidstone, ME14 1XX | [Redacted]
[Redacted]

Please help to save paper by NOT printing this email unless absolutely necessary.



Application 21/00473/PREM WINGS OF THE MORNING



Fri 16/07/2021 19:20

Licensing

You replied to this message on 19/07/2021 07:49.

Dear Anthony,

I have been trying to make a comment on this application via the website but have been unable to do so. Therefore I'm afraid I have had to email you directly.

The application for the event on the weekend of the 14th August and 3 events during the year is not one that I can support. I live about 1/2 a mile from the site and my objections to the use of this site, for events of this nature, are ones of safety and local disturbance. This field is close to the motorway slip road and the likely hood of traffic causing dangerous tailbacks on the A20 and the M20 is highly likely.

The noise factor for the local inhabitants is detrimental to their quite living and the possibility of drugs being sold on site along with the alcohol will spill out to the locality.

This event on the 14th August will clash with other events being held on the same weekend at the London Golf Club and Brands Hatch. The traffic will already be heavy on the A20 without an event of the size that the applicant is proposing.

This applicant has been advertising the event on social media for some weeks, encouraging people from all over London to attend. They also boast that at every event they have organised 3 times as many people turn up as tickets sold. They are also advertising transport from a number of locations around London.

The application is for 3 events a year. Those events will be held in the summer months so every couple of months. The granting of 3 events a year will give the applicant carte blanche to run whatever event they wish. No other site they have had events at has agreed to allow them to return.

The Wings of the Morning site has other applications for similar events i.e. the event before the committee for the 31st August. The land owner, St Cleres Estate, also allows other types of events on this site such a obstacle run days. This adds up to the local residents having to put up with most weeks being disturbed.

I would ask that this application for 14th August be denied and also the application for 3 events a year is also denied.

Regards



Stansted and Wrotham Parish Councils response to the Matts BBQ licensing application

Background

This document has been prepared by Stansted and Wrotham Parish Councils (the Parish Councils) who are acting together in their objection to the licensing application for Matts BBQ.

At the hearing the Parish Councils will be represented by Jeremy Philips QC of FTB Chambers and calling evidence from the following specialists who will act on behalf of both councils:

- a) Les Henry, Les Henry Associates Ltd - Traffic consultant
- b) Steve Gosling, 24 Acoustics - Sound consultant
- c) Jim Dale, British Weather Services - Expert Meteorological consultant

In addition, Harry Bott (or possibly Henry Rayner in his absence) will be speaking on behalf of the two Parish councils.

It is understood that Sir Robert Nelson will be speaking on behalf of the local residents adjoining the site.

This document provides a summary of our objections and the principal conclusions contained in the professional reports prepared by our expert consultants (as appended to this representation). Our professional witnesses will speak to these reports at the hearing on 28 July.

This document has been prepared on the basis of the last minute submission by the applicant to TMBC, stating that:

'For clarity, having spoken to the Estate and listened to advice from various parties:

BJP would like to amend the application to be for one weekend event per year (Friday to Sunday) between 1st April and 1st November.

For 2021 this will be Matt's BBQ on 14th August only.

Following a successful event in 2021 we may re-visit the license by way of variation and through negotiation with responsible authorities and interested parties.'

Summary

Procedural

The application is defective in that the applicant has failed to comply with the express requirement of Reg 25(a)(ii) as regards the display of public notices in the vicinity of the proposed premises. Accordingly, the licensing authority has no power to grant a licence in the face of such a fundamental breach of a key legislative requirement.

Merits

As regards substantive matters, the objections of Stansted and Wrotham PCs can be summarised under the following licensing objectives:

1. The prevention of crime and disorder
 - a. The corporate structure
 - b. Terms of ticket sales
2. Promotion of Public safety
 - a. Weather
 - b. Emergency access
 - c. M20 exit
 - d. Pedestrian bridges over the M20
 - e. Walking and cycling dangers
 - f. Landscape features
 - g. Hospitals
3. The prevention of public nuisance
 - a. Scale and length of the application
 - b. Traffic
 - c. Taxi capacity
 - d. Train capacity
 - e. Light pollution
 - f. Noise
 - g. Public footpath closure
4. The protection of children from harm
 - a. Under age attendees

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 and these have been summarised in **Appendix 1** for ease of referencing.

We then make recommendations and suggest a range of conditions we would like TMBC to impose, should it be minded to grant the application on a one-off basis.

Statutory requirements

In the case of large premises, Licensing Act 2003 (Premises Licences And Club Premises Certificates) Regulations 2005 (SI 2005/42) requires that:

'25 [Advertisement of applications by applicant]

In the case of an application for a premises licence under section 17 [..] the person making the application¹ shall advertise the application, in both cases containing the appropriate information set out in regulation 26 –

(a) for a period of no less than 28 consecutive days starting on the day after the day on which the application was given to the relevant licensing authority, by displaying a notice,

(i) which is –

(aa) of a size equal or larger than A4²,

(bb) of a pale blue colour,

(cc) printed legibly in black ink or typed in black in a font of a size equal to or larger than 16;

(ii) in all cases, prominently at or on³ the premises to which the application relates where it can be conveniently read from the exterior of the premises **and in the case of a premises covering an area of more than 50 metres square, a further notice in the same form and subject to the same requirements every fifty metres along the external perimeter of the premises abutting any highway'**

Evidence will be given at the hearing of the application that there has apparently been no attempt to comply with this fundamental requirement without which, it will be submitted, the application may not proceed.

The prevention of crime and disorder

Corporate structure

The license is being applied for by BJP Productions Limited – a company that was incorporated in 2017. The most recent accounts for 30 April 2020 show that it has negative net worth of (£23,268) and only one employee.

It is illegal to trade whilst knowingly insolvent. A full review of BJP Productions' latest management accounts for the period to 30 April 2021 should be conducted to ensure that the company is not insolvent. Alternatively, the applicant should be required to confirm to the sub-committee that this is not the case (in addition to the offence under the Insolvency Act 1986, it is, of course, a criminal offence knowingly or recklessly to make a false statement in or in connection with a licence application).

With only one employee and a negative net worth, the question must arise as to how any liabilities that might arise will be covered. An example of this is the public liability insurance. As the event is so close to the licensing application, it would be possible to show the committee details of insurance without actually having paid any premium.

The tickets are being sold by 'Matts BBQ', whilst the license is being applied for by BJP Productions Limited. There is no explanation as to the relationship between the two parties, or any indication as to where liability would lie should there be any problems. For example, if there was a serious injury or fatality, who would be liable for this – the ticket sellers or the licensee?

Prior event

We attach (Appendix 5) a report from when Matts BBQ was held at Colebrook Lakes in Tunbridge Wells, which shows that although the event was licensed for 1,000 people, c 4,000 attended the event.

The last time Matts BBQ was held was the South East of England Show Ground – and this was organised by BJP Productions. The Trustees for the showground banned Matts BBQ from returning because:

- They caused a statutory nuisance – despite 2 hours of asking for the low frequency bass to be reduced, the sound team refused to do this. The event was eventually pulled 5 minutes before its closure time
- As the event charged for car parking, a significant number of people parked in the streets outside the venue and partied round their cars and defecated in people's gardens.

This event had ticket sales of 5,000 and so was significantly smaller than the current application that could be nearly twice the size.

Terms of ticket sales

Matts BBQ has already started selling tickets for the event, even though any licence has yet to be granted and/or terms agreed. However, in the small print on the ticketing web site it states that:

“After you have purchased a Ticket it cannot be exchanged or refunded.

Where (i) an Event is cancelled by the Organiser; or (ii) an Event is cancelled or curtailed because of circumstances beyond our control, we shall not be liable to make any refund or pay any compensation beyond the refunds that may be payable under the Organiser's rules.”

“You agree you will have no claim against us, in respect of any decision to remove Events from this site or any decision to suspend or terminate your access to this site.”

Matts BBQ has not explained to potential purchasers the circumstances by which tickets (for what would have to be a TMBC licensed & authorised event) can be refunded.

Anyone purchasing tickets to an event that currently has no licence has no protection.

Matts BBQ is required by law to put their limited company number and address on their website. Neither is anywhere to be seen.

GDPR and data privacy

Matts BBQ us required by law to have a privacy and data policy on its website along with its terms and conditions. This is nowhere to be seen.

Promotion of public safety

Suitability of the site

Weather

We have employed a Weather expert to review the suitability of the site. Their report is supplied as Appendix to these representations. We will be asking them to assist the sub-committee with evidence at the hearing.

The principal conclusions of Jim N R Dale, senior meteorological observer at British Weather Services, were as follows:

'Conclusion:

It would be fair to say that outside events held during *clement weather* in open fields, irrespective of their exposure and height above sea-level could be held without concern for the safety of the organisers and attendees. During average summer months, that would ordinarily be for the vast majority of the time period, albeit it may not be so hospitable at times of colder temperatures, rain, drizzle and higher winds.

However, when considering the safety aspects of weather, the focus must be upon the weather's potential to be hazardous/dangerous, which directly relate to the proposed site. In that respect, and in relation to the proposed site in question, I do have certain concerns.

The first and possibly the most important for your consideration is the exposure to thunderstorms and possible lightning activity. Thunderstorms are more prevalent during the summer months and by their very nature are more common in and around higher ground, due to the updrafts of warm unstable air from the surrounding lower plains. Given the local and regional topography, I would consider the proposed site to be within a relatively high-risk area. Also, the surrounding trees would offer a dangerous shelter lure during thundery downpours. Indeed, easy and accessible 'safe zones' from any overhead thunderstorm situation appear few and far between.'

Emergency access

The event will create significant traffic jams (see below) and this will cause potential 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.

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, should the council decide to allow the event. The jam will stretch back on the M20 which has short visibility due to the bend. We believe this is a serious traffic hazard and has a significant 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.

We are extremely concerned that late at night festival goers from Wrotham and Borough Green would 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.

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, which is 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 with tractors 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, would be impeded.

We are also extremely concerned that the key exit to the car parks go through over 50 metres of densely wooded land which at night-time could be dangerous (especially in stormy conditions).

Hospitals

In part D, 22 the application form states:

“There are 2 Hospitals within 5 miles of the site..”

It also identifies Sevenoaks as being 4.8 miles away.

Both statements are factually incorrect. Sevenoaks does not have an A&E facility and is only open between 8am and 8pm. According to Google Maps at its closest it is 6.7 miles away and takes 17 minutes to get there without any traffic jams”

Details of local hospitals with A&E facilities are as follows

- Maidstone Hospital - 11.5 miles - 19 minutes (without any traffic jams)
- Darent Valley Hospital 13.0 miles - 17 minutes away (without any traffic jams)
- Pembury Hospital 16.6 miles - 27 mins away (without any traffic jams)

{distances and times from Google Maps taken during a time with no traffic jams}

With the inevitable traffic jams there will be significant delays in getting an ambulance to the site. If the land is waterlogged then any ambulance will get stuck before it can even access the location.

The prevention of public nuisance

Traffic

We have employed a traffic consultant. Their report is also appended as part of this submission. The traffic consultant will be acting as an expert witness on our behalf. Mr Henry's¹ principal conclusions are as follows:

'7.0 Conclusions

7.1 The proposals for a music festival with a capacity for 9,999 people at Wings of the Morning Field, Wrotham Hill, Wrotham, TN15 7NS would alone have a considerable impact on the local area in terms of highway capacity, safety, and congestion.

7.2 However, there are two other large event taking place on the weekend of 12th to 15th August 2021. The English Open at London Golf Club and "Festival Italia" at Brands Hatch which themselves will generate considerable levels of vehicular traffic.

7.3 The Transport Management Plan produced in support of the application for a premises license does not mention these simultaneous events. Whilst it includes sections relating to proposed routes, traffic management, car parking restrictions, temporary traffic signal control and the use of coaches and shuttles, it does not provide any clear or realistic details.

7.4 The applicant has no idea where the client base is located and cannot therefore predict any routes customers will take to get to and from the site and subsequently cannot be confident the proposed traffic management measures will be effective.

7.5 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 and manoeuvring.

7.6 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.

7.7 It is likely that considerably levels of obstructive, illegal on street car parking will take place as has been the occurrence on Wrotham Hill in the past when other events have taken place in the locality.

7.8 Vehicles arriving to pick up revellers after the proposed events will be doing so in darkness which will lengthen the length of their stay on the highway which in turn will potentially add to vehicle queuing in the area including tailbacks onto the M20 at junction 2 with potentially disastrous impacts for highway safety.

¹ Incorporated Engineer, a Fellow of the Institute of Highway Engineers and a Member of the Chartered Institution of Highways and Transportation.

7.9 There is little indication the applicant has made any contact with either Highway Authority (Highways England and Kent County Council) in respect of the various traffic management measures proposed in the TMP and whether any permissions have been granted/agreed.

7.10 Furthermore at the time of writing this report there are significant highway works being undertaken on A25 Maidstone Road, Platt to the southeast Highway Safety Appraisal: Premises License - Matts BBQ 2021 July 2021 13 regarding a void in the highway associated with Southern Water plc and works are expected to continue until at least 20th August 2021.

7.11 The proposals should not therefore receive a license until such time the current road works in Platt have been resolved and the traffic management measures have been fully explored and agreed with both Highway Authorities concerned (Kent County Council and Highway England).'

We would make one further observation that is not covered in the traffic report. Upon speaking to the Events Team at the South East of England Show Ground, they stated only c.300 people came by coach to the event and the majority came by car. On this basis the coach numbers forecast should be significantly reduced, and this will, increase the total traffic requirement to a level that the existing car parks will not be able to manage. This will drive people, to park within the neighbouring roads (as they did at the South East of England Show Ground.

Taxi capacity

TMBC will know the number of licensed taxis available within a suitable distance of the site. There are only 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. Consequently, were a licence to be granted for 2021 Matts BBQ would swamp the local taxi capacity, so creating two public nuisances: -

- Inability of the local population to get home from existing local rate paying / licensed hospitality venues
- Inability of festival goers to leave the site at a reasonable hour, leading to congregating youths who are tired and drunk, potentially resulting in further disorder.

In practice, the insufficient taxi capacity is likely to will cause people to walk to the nearest conurbations and if local (within, say, a 5-mile radius) then to their houses

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.

Train Capacity

The nearest train station is at Borough Green and this is 2.5 miles away from the site. According to Google maps this will, take 56 minutes to walk and this will involve going over a narrow footbridge high above the M20 causing a danger in the dark.

The last two trains from Borough Green leave at 23:15 and 0:15. Owing to the event closing at 11:00 and the crowds trying to leave we do not believe there will be:

- Sufficient time for the all the people requiring to catch a train to get to the station
- Sufficient train capacity to get all the people back to London

As a result we are concerned about the loitering of attendees within Brough Green with no way of getting back until the first train the next morning at 0&:23

Light pollution

The Purple Guide states 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 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 – especially for the houses in the centre of the car park.

Noise

We have employed a sound consultant and their report is appended. Our sound consultant will be representing Stansted and Wortham Parishes at the hearing to outline the key points in this document. The conclusion states:

4.0 CONCLUSIONS

4.1 It is considered very likely that the proposed event will result in substantial low frequency noise levels at the nearest properties to the north.

4.2 It is 24 Acoustics’ opinion that, if the licence were permitted without any practicable noise mitigation measures, noise levels affecting the nearest properties would amount to public nuisance as defined by the Licensing Act (2003). This would place the local authority in a difficult position as the licensing authority that would have allowed consent for the event but also as the investigating authority.

4.3 On the basis of the above, it is recommended that the applicant be invited to investigate practicable noise control measures to avoid the substantial noise impact to nearby properties.

Public footpath closure

KCC's PROW and Access team have confirmed they have yet to have an application to close MR 223 - a footpath off Terrys Lodge Road) and MR224 - a bridleway going across the concert site on Wings of the Morning.

Even if an application was applied for, they have confirmed that they will not have sufficient time under their processes to close the footpath and bridleway before the events. See **Appendix 6** showing the footpaths which would have to remain fully open for public access.

The protection of children from harm

Minors at the event

Matts BBQ has already started selling tickets for the event and these are available for children between the age of 13-18 – see Appendix for picture of ticket terms and conditions.

The license application, on the other hand, states that:

“Entry to the licensed premises is only permitted to those over the age of 18 unless specifically marketed as a family event”.

All the online marketing for Matts BBQ on the internet (Facebook, Twitter and their website) make no mention of this being a ‘family event’, or what any policy is with regard to minors. The promotional videos indicate anything but ‘family friendly’. The main event document for Matts BBQ states that they will not serve alcohol to people under the age of 18, which implies that this event will have minors as part of its clientele.

We are extremely concerned that minors have already purchased tickets to this event and will arrive with no responsible adult to look after them. This will be particularly relevant for children in the local communities of West Kingsdown, Borough Green, Stansted, Wrotham, Vigo, New Ash Green and Meopham. All of them are within walking distance of the site. There is no doubt a proportion of these minors who will walk home at night in an area with no street lighting and along major roads.

The route to Borough Green and Wrotham requires crossing a bridge at the bottom of Wrotham Hill, necessitating a dangerous walk down the A20 and then over the M20. People trying to get to the train station will also need to take this route. There is no street lighting until Wrotham has been reached at the bottom of the hill.

In the event of the sub-committee deciding to approve the application

Should TMBC be minded to grant this application, we would respectfully suggest that the following be considered:-

Restrictions to be attached to any licence

- **The licence should only be applicable for one year and one day – not a Friday.**

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

Maximum level for amplified music within the Parish

- A monitor should be located at each roads agreed with the Chief EHO for TMBC.
- Any average DMb should be based on a rolling five minute average (LAeq), not 15 minutes, as suggested in the proposal.

Reason: 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 of all amplified noise being terminated upon the direction of a duly authorised TMBC EHO.
- Any music that is created electronically to be put through a sound limiter at the agreed levels, such sound limiters to 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.

Provision of traffic wardens – paid for by the festival

- Traffic wardens with the appropriate authority, by means of appropriate local by-laws, shall manage any illegal parking and fine accordingly.

Reason: We have shown that the site does not have sufficient parking for the number of cars that could be expected. Any such condition would 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

- The applicant shall agree a detailed Traffic Management Plan with the Highway Authority and the providers of emergency services not less than [28?] days prior to any event.

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

Provision of a call recorded telephone number to the parishioners of Stansted and Wrotham.

- A designated telephone number will record all calls made by the local community or other persons and will also show all any calls that have not been answered. The data from the call recorded numbers to be cross referenced with the recordings by the site operator to demonstrate that it has reacted to complaints and the extent to which these have been resolved.

Reason: If the organisers provide a telephone number they will 'mark their own score card' and it could not be proved whether they have acted in accordance with the plan submitted.

A fully agreed noise plan and attendant mapping with suitable levels for low frequency bass that will not cause a stator nuisance. This plan to set with reference and input from Stansted and Wrotham's independent sound consultant

Sound levels to be controlled to 70 dB LZeq 63 Hz (1/1 Octave), 5 minutes at the nearest affected sensitive properties.

Reason: to avoid a statutory nuisance

- No charge shall be made of car parking

Reason: to avoid cars parking in the neighbourhood and walking to the event.

- Pay for a representative from TMBC Environmental health to be at the event and its environs throughout the period of the event.

Reason: to check that the noise levels are being adhered to, to check on all issues outside and inside of the venue. To act as a independent witness to the event and to make sure it is run within terms of the licence and supporting documentation.

- The Premises Licence Holder shall ensure that a means of counting the public entering and leaving the premises through any of the entries or exits is in place. The nature of the systems of counting will be agreed with the Kent Police and the Licensing Authority. The Premises Licence Holder shall comply with the agreed system

Reason: to verify that the licensee has control of the event and are aware at all time sof the amount of people on site

- The Premises Licence Holder shall on request provide to Kent Police and/ or the Licensing Authority figures for pre-event ticket allocation, such information to be supplied within 24 hours of any such request

Reason: to verify that the amount of tickets sold have not exceeded the amount under the licence

- The Premises Licence Holder shall at all times during the event maintain the minimum number of stewards per 75 attendees.
- For all events all Stewards will be trained in their duties prior to allowing members of the public onto the premises to ensure they have a full understanding of the operational, safety and emergency procedures applicable to the event. All training records will be kept by a responsible person and be available for inspection upon reasonable notice being given.

Reason: for the maintenance of order

- The Premises Licence Holder will make arrangements for maintaining public rights of way on the premises or for closure or dealing with the manner in which the members of the public will be escorted through or around the premises, such arrangements to be confirmed or notified to the licensing authority.
- A written refusals book will be maintained at each bar or outlet where alcohol is provided or sold on the licence premises. This book will be bound and clearly marked. The following information will be recorded for every refusal:
 1. The time of refusal;
 2. The item refused;
 3. Name or description of person refused the sale;
 4. Reason for refusal;
 5. Name of staff member making the refusal;
- The supervisor on duty will sign or countersign all entries in the refusal book at the end of each shift
- All refusal books will be made available for inspection to any police officer, local authority, licensing officer or Trading Standards Officer at any reasonable time.
- No fireworks

Reason – to protect the amenity of local residents and animals within a rural environment

Appendix I

Summary of the representations made where points fall into more than one category

	Prevention of crime and disorder	Public safety	Prevention of a public nuisance	Protection of children from harm	Breaks the Licensing Act 2003	Breaks other laws	Comment
Insufficient Blue Notices					X		
Lack of site knowledge					x		Clauses 8.41, 8.42, 8.43, 8.44, 8.45, 8.46,
Corporate structure	X						
Terms of ticket sales	X					x	Does not display company number on website
GDPR and Privacy						x	No GDPR or privacy policy on the Motts BBQ website
Weather		x					
Emergency access		x					
M20 Exit		x					
Pedestrian Bridges over M20		x					
Walking and cycling dangers		x					
Landscape features		x					
Hospitals		x					
Scale of the application			x				
Traffic			x				
Taxi capacity			x				
Train capacity			x				
Light Pollution			x				
Noise			x			x	Satutory Nuisance as proposed
Public footpath closure			x			x	Application too late to close 2 public footpaths
Underage attendees				x			

Appendix 2

Les Henry, Les Henry Associates Ltd - Traffic consultants



HIGHWAY SAFETY
APPRAISAL FOR MATT

Steve Gosling, 24 Acoustics – Sound consultant



9157-1 Noise
Review.pdf

Appendix 4

Jim Dale, British Weather Services - Meteorological consultants



ST.CLERE MET.
REPORT.docx

Appendix 5

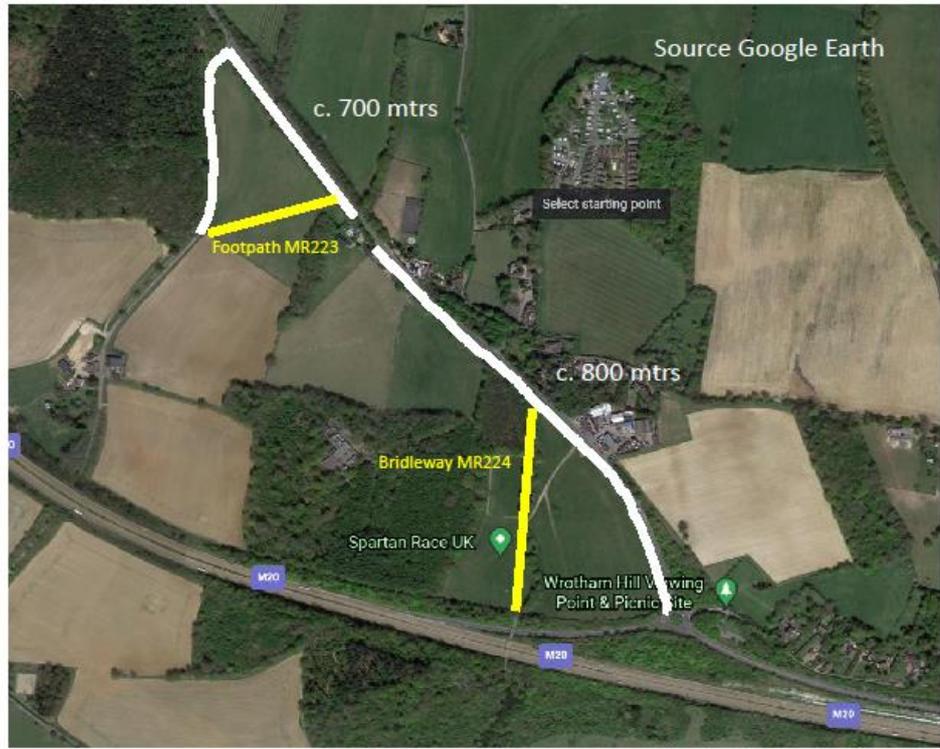
Report from Matts BBQ held at Colebrook Lakes, Tunbridge Wells in 2017



MattBBQ Tunbridge
Wells Appendix C.pdf

Appendix 6

Public footpaths affecting the Site



WROTHAM AND STANSTED PARISH COUNCILS
PREMISES LICENSE FOR MATTS BBQ 2021
HIGHWAYS SAFETY APPRAISAL
A20 LONDON ROAD, STANSTED, SEVENOAKS, KENT

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1.0 Introduction

- 1.1 Les Henry Associates Limited have been instructed by Stansted and Wrotham Parish Councils (The Parish Councils) to provide this Highway Safety Appraisal of the proposed premises licence for the Matts BBQ 2021, a music festival, on the Wings of the Morning Field, 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 nearly 40 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.
- 1.5 This Highway Safety Appraisal identifies several problems associated with the proposals in terms of the 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 Stansted Parish Councils.
- 1.7 This report has been prepared for the sole use of the Parish Councils. No other third parties may rely upon or reproduce the contents of this report without the written permission of Les Henry Associates Limited. If any unauthorised third party comes into possession of this report, they rely on it at their own risk and the authors do not owe them any Duty of Care or Skill.

2.0 Site, Highway and Public Transport Characteristics

- 2.1 The Wings of the Morning Field is positioned the north of the M20 motorway eastbound off-slip road at junction 2, to the south and west of A20 London Road.
- 2.2 The Parishes of Stansted and Wrotham lie to the north and southeast respectively.

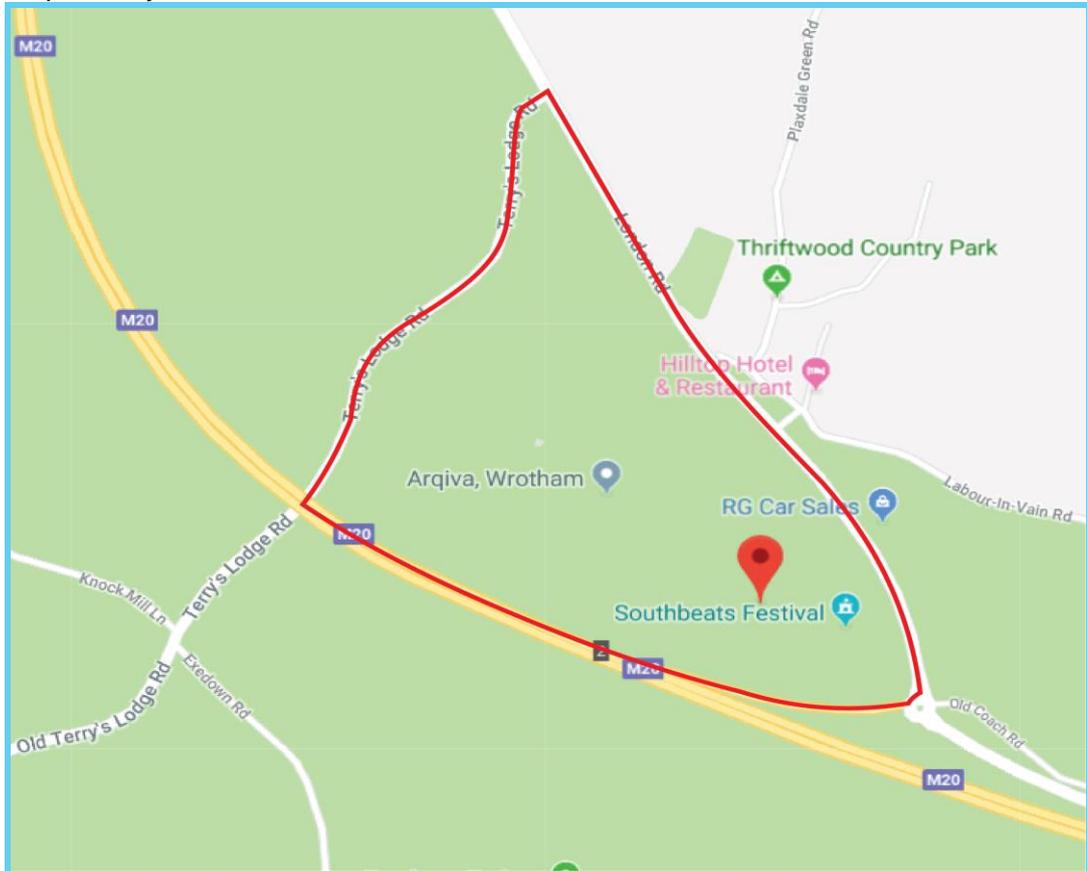


Figure 1: Site Location Plan

- 2.3 Wrotham and Stansted are connected to the road network with access to the M20 and M26 via the A20.
- 2.4 A20 London Road and A227 Borough Green Road are classified roads and are designated as Secondary Routes and C31 Terrys Lodge Road is a classified road and is designated as a local route within the Highway Authority's (Kent County Council) road hierarchy.
- 2.5 The statutory speed limit for A20 London Road and Terrys Lodge Road is the National Speed Limit for a single carriageway without street lighting which is 60mph.
- 2.6 Borough Green and Wrotham Railway Station to the south provides services to London Victoria, London Blackfriars, and east Kent.

- 2.7 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.



Figure 2: Local Bus Services

- 2.8 A brief analysis of the “Crashmap” website indicates there have been 6 reported vehicle collisions at the roundabout junction with London Road and M20 off-slip road resulting in 5 incidences of slight injuries and 1 of serious injury since 2016.
- 2.9 The website also indicates there have been 3 vehicle collisions on London Road since March 2018 between the roundabout junction and Terry’s Lodge Road all resulting in serious injuries.
- 2.10 The highway safety record therefore gives rise to some concern.

3.0 The Proposals

- 3.1 The proposals seek a premises license to hold music festivals on the Wings of the Morning Field with one 3-day event (Friday to Sunday) with a capacity for 9,999 people, 3 further events (Friday to Sunday) with capacity for 4,999 people and occasional Bank Holiday Monday events with a capacity of 4,999 people.
- 3.2 The main site access for the proposed events would be via the existing gated access on the southwestern side of London Road which is approximately 250m northwest of the roundabout junction of London Road with the M20 junction 2 off-slip road.
- 3.3 Directly opposite this access is an industrial estate comprising car dealerships known as "Trade House Cars", "Valley Autos" and "Kent Poptops".
- 3.4 A bus stop serving northbound services is located approximately 25m south of this access but has no hard paved standing area, or shelter for bus service patrons. A southbound bus stop is located approximately 100m to the south but there is a footway on the northern side of London Road at this point.
- 3.5 There are no formal or informal pedestrian crossing points in the vicinity.
- 3.6 This access would provide for the construction traffic used for the setting up of the festival infrastructure and services, picking up and dropping off customers VIP parking, staff parking and for coach dropping off.
- 3.7 Further car parking would be provided on land to the north of the existing terrestrial television aerial site which has vehicular access on the southwestern side of London Road opposite the former Horse and Groom Public House site and the northern most end of Labour in Vain Road.
- 3.8 There are laybys on both sides of this access and often HGVs are parked within them which severely restricts visibility for drivers emerging from the access onto London Road.
- 3.9 Potential future car parking could be made available on land to the east of Terry's Lodge Road and to the south of its junction with London Road.
- 3.10 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.
- 3.11 Any 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 considered when considering the planning application.

- 3.12 The applicant has stated work in preparation for the first event on the site has taken place for several months with small scale infrastructure work which has not created any local area impact and involved measuring, checking ground conditions, etc.
- 3.13 The proposed building process will initially consist of several delivery vehicles bringing equipment to site, including some perimeter fencing being the most urgent priority.
- 3.14 These works will typically take place between 8am and 8pm with the last period for snagging and staff deployment until opening.
- 3.15 The proposed shows would end at 11pm with technical equipment removed immediately and large site infrastructure not removed until the following day.
- 3.16 Security staff would be deployed on the site once valuable equipment is brought to the site and any fence will be kept locked to prevent unauthorised access.
- 3.17 Dispersal of visitors will be by midnight following the event with technical de-rig starting as soon as safely possible after the last act has closed on that day. This would be non-noisy work only and would consist of removing speakers and lighting from site.

4.0 Transport Management Plan

- 4.1 The submitted Transport Management Plan (TMP) states the following objectives:
- A. The maintenance of public safety on the local highway infrastructure;
 - B. Minimise disruption to all road users with special emphasis on maintaining the integrity of those routes which act as local alternative to the strategic trunk road network;
 - C. Minimise the disruption and impact of such an event on local communities; and
 - D. Optimise the experience of visitors to the event.
- 4.2 Historical traffic data provided by the Department for Transport has been utilised to suggest the Average Annual Daily Traffic (AADT) two-way vehicular traffic flows on London Road in the vicinity of the proposal site were in the region of 23,700 vehicles in 2017.
- 4.3 The proposals are stated as expecting to generate a minimum of 2770 vehicle movements during both the arrival and departure times and includes dropping off and picking up.
- 4.4 The stated event traffic amounts 11.6% of the daily traffic flow on London Road which will be added to existing traffic flows at both the beginning and end of the proposed events.
- 4.5 Taking this huge increase in traffic into account the TMP states the applicant: -
- “will be consulting with local residents and will take all concerns into account during the event. These concerns will also be implemented in the traffic planning phase.”
- 4.6 It is, however, unclear whether any such consultation has taken place or whether any such concerns will be mitigated.
- 4.7 The applicant states that generally, if vehicles have a free flow exit onto good access routes around 700 vehicles per hour, per gate can exit assuming the gates are unobstructed. However, this number decreases if the route is busy or compromised.
- 4.8 It is stated “Parking marshals will remain in the car parking areas until the queues have dispersed and the static vehicle count is under 10%”. It is however, unclear what the 10% refers to.
- 4.9 The TMP is also silent on other events taking place in the locality.

- 4.10 The English Open Golf Tournament is taking place at London Golf Club a relatively short distance to the north along A20 London Road between 12th and 15th August 2021 which will attract many visitors and associated vehicular traffic.
- 4.11 In addition, “Festival Italia” is taking place at Brands Hatch adjacent to London Golf Club on 15th August 2021 which will also generate a considerable level of additional vehicular traffic throughout the local highway network.

5.0 Traffic Management and Traffic Regulation Orders

- 5.1 It is proposed that the current National 60mph speed limit for London Road between its roundabout junction with M20 junction 2 off-slip road and Ash Lane be reduced to 30mph during the event.
- 5.2 In addition, the applicant proposes and prohibition of parking and loading on London Road between the M20 in the southeast to Stanstead Lane in the northwest, sections of Terry's Lodge Road, Ash Lane, Labour in Vain Road and Plaxdale Green Road.
- 5.3 There will, however, be a residents parking system so that residents would be unaffected.
- 5.4 The proposed "Clearway" order is intended to prevent vehicles from stopping on London Road to drop off passengers.
- 5.5 It is unclear whether any negotiations or discussions have taken place with the Highway Authority (Kent County Council), whether any agreement has been reached or how the orders will be enforced.
- 5.6 The process of making such Traffic Management and Regulation Orders requires public consultation with opportunities for affected parties to make representations. It is unclear whether any such consultation is planned or has taken place.
- 5.7 The proposals include the provision of temporary traffic signals at the site access/egress onto London Road that would be used for VIP, staff and picking up and dropping off customers. Another location is included for the same form of traffic control, but it is unclear where this access is positioned.
- 5.8 The signals would operate during the exit phase at the end of the event and "Stop/Go" would be used for the entry phase. There is no explanation for what is meant by "Stop/Go".
- 5.9 Temporary traffic signal are also proposed on the roundabout junction of A20 London Road and the M20 off-slip road at junction 2.
- 5.10 The operation of this roundabout is critical for operation of the M20 motorway as any extending queues on the slip road that could potentially queue back onto the M20 would have serious consequences for highway safety.
- 5.11 Highways England would need to agree to any such temporary traffic management measures and will require robust traffic modelling before any such measures could be agreed.

6.0 Signing

- 6.1 The proposed signs directing traffic to into the various site and car parking areas is stated as being in accordance with Chapter 8 of the Traffic Signs Manual, New Roads and Street Works Act 1991 but should also comply with Traffic Advisory Leaflet 04/11 dated October 2011.
- 6.2 Section 2.6 of the TMP provides no information regarding ticket sales, the location of residences of the purchasers and therefore the applicant has no idea where attendees of the proposed event will be travelling from.
- 6.3 The proposed routes provided in Section 3 of the TMP are at best spurious and need to be reconsidered following collection of ticket sale data and a more logical assessment of approach routes.

7.0 Conclusions

- 7.1 The proposals for a music festival with a capacity for 9,999 people at Wings of the Morning Field, Wrotham Hill, Wrotham, TN15 7NS would alone have a considerable impact on the local area in terms of highway capacity, safety, and congestion.
- 7.2 However, there are two other large event taking place on the weekend of 12th to 15th August 2021. The English Open at London Golf Club and “Festival Italia” at Brands Hatch which themselves will generate considerable levels of vehicular traffic.
- 7.3 The Transport Management Plan produced in support of the application for a premises license does not mention these simultaneous events. Whilst it includes sections relating to proposed routes, traffic management, car parking restrictions, temporary traffic signal control and the use of coaches and shuttles, it does not provide any clear or realistic details.
- 7.4 The applicant has no idea where the client base is located and cannot therefore predict any routes customers will take to get to and from the site and subsequently cannot be confident the proposed traffic management measures will be effective.
- 7.5 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 and manoeuvring.
- 7.6 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.
- 7.7 It is likely that considerably levels of obstructive, illegal on street car parking will take place as has been the occurrence on Wrotham Hill in the past when other events have taken place in the locality.
- 7.8 Vehicles arriving to pick up revellers after the proposed events will be doing so in darkness which will lengthen the length of their stay on the highway which in turn will potentially add to vehicle queuing in the area including tailbacks onto the M20 at junction 2 with potentially disastrous impacts for highway safety.
- 7.9 There is little indication the applicant has made any contact with either Highway Authority (Highways England and Kent County Council) in respect of the various traffic management measures proposed in the TMP and whether any permissions have been granted/agreed.
- 7.10 Furthermore at the time of writing this report there are significant highway works being undertaken on A25 Maidstone Road, Platt to the southeast

regarding a void in the highway associated with Southern Water plc and works are expected to continue until at least 20th August 2021.

- 7.11 The proposals should not therefore receive a license until such time the current road works in Platt have been resolved and the traffic management measures have been fully explored and agreed with both Highway Authorities concerned (Kent County Council and Highway England).

APPENDIX A
Site Photographs

Proposed Main and VIP Access









Access to Terrestrial TV Aerial Site Car Parking









Terry's Lodge Road









APPENDIX B
CRASHMAP Data

crashmap.co.uk

CrashMap Data: Great Britain 1999 - 2019 (verified) - 2020 Provisional data to June

Home CrashMap Pro My Account FAQ Contact us Log Out

Map data ©2021 Terms of Use Report a map error

^ Hide

Location:

Years: 5 of 22 years selected

Severity:

Fatal	<input checked="" type="checkbox"/>
Serious	<input checked="" type="checkbox"/>
Slight	<input checked="" type="checkbox"/>

Casualty Types:

Vehicles Involved:

Search

[Open Government Licence](#)

Incident Severity

Slight Serious Fatal

8 results found

crashmap.co.uk

CrashMap Data: Great Britain 1999 - 2019 (verified) - 2020 Provisional data to June

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Hide

Location:

Years selected: 5 of 22 years selected

Severity: Fatal, Serious, Slight

Casualty Types: All Casualty Types

Vehicles Involved: All Vehicle Types

Search

Open Government Licence

Map data ©2021 Terms of Use Report a map error

Incident Details
Date: 09/04/2020
Severity: Serious
Number of Vehicles Involved: 1
Number of Casualties Involved: 1
View Detailed Report

Incident Details
Date: 22/03/2018
Severity: Serious
Number of Vehicles Involved: 3
Number of Casualties Involved: 2
View Detailed Report

Incident Details
Date: 23/03/2019
Severity: Serious
Number of Vehicles Involved: 1
Number of Casualties Involved: 1
View Detailed Report

Incident Severity
Slight Serious Fatal
51 results found



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Mr Harry Bott
Stansted Parish Council
Stansted
Sevenoaks
Kent

Date: 15th July 2021
Reference: 9157-1 Rev 0

Dear Mr Bott,

RE: Review of Noise Impact Assessment for Matt's BBQ Event at St Clere Estate, Sevenoaks

Further to our discussion, please see our comments, analysis and recommendations below.

1.0 INTRODUCTION

- 1.1 An application has been submitted for a music festival at the St Clere Estate, Sevenoaks. It is understood that the current proposal is for a single day event to take place on Saturday 14th August, comprising 3 music stages, starting at 12:00 and finishing at 22:30 hours.
- 1.2 In preparing this review, reference has been made to the following document:
- F1 Acoustics Noise Management Plan (dated June 2021)
- 1.3 Concern has been raised regarding the potential for noise impact from the event, particularly at low frequency. This report, therefore, reviews the submitted documents and makes recommendations where necessary. Specifically, the following key areas have been reviewed:
- Review of acceptability criteria
 - Accuracy of input source data
 - Accuracy of 3D modelling
 - Assessment and rating of overall results
- 1.4 The site location plan and surrounding area is shown in Figure 1. The proposed site plan is shown in F1 Acoustics report, with 3 stages and the majority of nearby residential properties to the north and northeast. Reference is made in the report to agreeing relevant properties with Chelmsford City Council, though this is likely to be a typographical error.
- 1.5 All sound pressure levels quoted in this report are in dB relative to 20 μ Pa. A glossary of the acoustic terminology used in this report is provided in Appendix A. The author's qualifications and experience are shown in Appendix B.

2.0 CRITERIA

- 2.1 The Noise Council's document the "Code of Practice on Environmental Noise Control at Concerts" (The Code) is relevant for this type of event (See Appendix C). The purpose of The Code is to provide guidance on how disturbance or annoyance from large music events at open air sites can be minimised. It should be noted that the guidance has been withdrawn.
- 2.2 The Code presents guideline noise levels for concerts and recommends noise control procedures which are considered to provide an effective means of addressing environmental noise control at concerts.
- 2.3 Noise transmission from the event will depend on a number of factors including the concert type, location of the stage, and orientation of loudspeaker systems. The Code of Practice suggests that music noise levels below 95 dB L_{Aeq} at the stage are unlikely to provide satisfactory entertainment for the audience and so use of this level, in combination with a typical modern music frequency spectrum, is considered a robust approach.
- 2.4 The Code suggests that Music Noise Levels (MNL) should not exceed 65 dB, $L_{Aeq,15min}$ at the façade of noise sensitive receptors where concerts are proposed for a rural location and will not occur more than 3 days per year. In this case (a single day event), it is considered that a MNL limit of 65 dB $L_{Aeq,15min}$ is appropriate and consistent with similar events in the wider area.
- 2.5 Section 3.4 of the Code acknowledges that overall A weighted noise levels do not adequately inform the impact from low frequency noise which may cause unreasonable disturbance, even where the A weighted limit is being met.

3.4 Assessment of noise in terms of dB(A) is very convenient but it can underestimate the intrusiveness of low frequency noise. Furthermore, low frequency noise can be very noticeable indoors. Thus, even if the dB(A) guideline is being met, unreasonable disturbance may be occurring because of the low frequency noise. With certain types of events, therefore, it may be necessary to set an additional criterion in terms of low frequency noise, or apply additional control conditions.

Notes to Guideline 3.4

1. It has been found that it is the frequency imbalance which causes disturbance. Consequently there is less of a problem from the low frequency content of the music noise near to an open air venue than further away.
 2. Although no precise guidance is available the following may be found helpful (Ref.8): A level up to 70 dB in either of the 63 Hz or 125 Hz octave frequency band is satisfactory; a level of 80 dB or more in either of those octave frequency bands causes significant disturbance.
- 2.6 The Code acknowledges (25 years ago, at the time of publication in 1995) that a low frequency façade value of 70 dB L_{Zeq} at 63 Hz and 125 Hz are likely to be satisfactory externally at receptors, with values 10 dB higher at 80 dB likely to cause significant disturbance.
 - 2.7 It is acknowledged that frequency imbalance of music noise as assessed at a receptor is a key issue. Prior to publication of the Code, smaller festival loudspeaker systems were generally not capable of producing significant low frequency output. In addition, there has been a strong trend in the last 25 years in dance music production and latterly in festival expectation for significantly higher sound pressure levels at low frequency. For some festivals, monitoring of very low frequency levels at 31.5 Hz (1/1 octave) is an important factor.
 - 2.8 Although there is no guidance to determine what constitutes a frequency imbalance between low and high frequency, in 24 Acoustics' view, this normally occurs when the 63 Hz single octave L_{eq} level is 15 to 20 dB or higher than the overall A weighted L_{eq} level at the relevant receptor. This

outcome can occur at relatively close distances, particularly at locations to the rear of a music stage, where mid and high frequency energy is projected forwards using high directivity loudspeakers, as planned at Matt's BBQ Event.

- 2.9 Frequency imbalance at significant distance is normally only observed when considering relatively flat music source spectra (ie, akin to light pop eg, Elton John). Electronic dance music contains significantly higher bass content at source hence the imbalance will be observed even at short distances. Example source spectra and A-weighted dBA values for different musical content is shown in Figure 2 (source – D&B AudioTechnik).
- 2.10 Meteorological effects also play an important role for offsite noise. The prevailing wind direction in the UK is from the south west and this means that properties located to the north east of a festival site are likely to receive higher event noise than those elsewhere.

3.0 REVIEW

- 3.1 The nearest residential properties to the stages are located from a distance of 90m and are located on London Road and slightly further afield in Labour-in-Vain Rd. For a rural event, this is a very tight separation distance. For context, the nearest residential properties to Carfest South, for example, are at a distance of approximately 630m.
- 3.2 The source data proposed in Table 4.1 of F1 Acoustics' report appears realistic in terms of frequency shape. It would be prudent to consider inclusion of 31.5 Hz data given that character of the proposed music.
- 3.3 The proposed levels of 112 dB $L_{Zeq\ 63\ Hz}$ for Stage 2 at a distance of 15m are likely to give rise to a freefield level of circa 96.4 dB $L_{Zeq\ 63\ Hz}$ at London Road (90m), assuming standard spherical spreading (which applies at low frequency). It is noted that a cardioid sub pattern is proposed and this may well help reduce levels directly to the rear, though there is no mapping or contour predictions to show how the cardioid pattern would work for properties to the side. For additional context and using the same calculation method, the low frequency noise level at The Hilltop Hotel (at 200m) would be circa 89 dB $L_{Zeq\ 63\ Hz}$. Contributions from Stage 1 and Stage 3 would further increase the low frequency noise level at the nearest properties.
- 3.4 The highest predicted noise level of 83 dB $L_{Zeq\ 63\ Hz}$ (freefield assumed) shown in Table B1 for the nearest properties in London Road has not been substantiated and, in any event, is above the level known to "*cause significant disturbance*". Music noise at this level would preclude any reasonable use of an external amenity space at any time of the day, but particularly during the evening period. F1 Acoustics should confirm any corrections, if applicable, to the freefield level, to allow a direct comparison with the values in the Code.
- 3.5 On this basis, the proposed output from Stage 2 is likely to cause significant disturbance and may well operate at a level substantially higher given the unknown spatial pattern of the cardioid subs. In 24 Acoustics' experience, where a known significant adverse effect is likely for an event, it is normal to either a) offer alternative accommodation to the affected properties or b) replan the site layout. It is recommended that the applicant consider these options.
- 3.6 I have no reason to doubt the mapping methodology used by F1 Acoustics. In understanding the approach, it would be useful for the loudspeaker directivity assumptions to be reported. I can see that directivity data for a different manufacturer (D&B) has been proposed; this may or may not be significant hence it would be useful to understand the assumptions made.
- 3.7 It should be noted that although the ISO 9613 methodology assumes downwind propagation in each direction, this doesn't necessarily mean a worst case outcome as low (height) level temperature inversions (which occur frequently in summer evenings) will result in higher offsite noise levels. The ISO 9613 cannot accommodate this input and therefore the results assume

only the effect of light wind. The effect that low level temperature inversions have on sound propagation over distance can be extreme and their consequences should not be underestimated.

Summary

- 3.8 A comparison of predicted noise levels from F1 Acoustics (method unknown) and 24 Acoustics (stage 2 only, spherical spreading) for the nearest affected properties is shown in Table 1.

Receptor Location	Free-field Sound Pressure Level (dB L _{Zeq} 63 Hz, T)				
	24 Acoustics	F1 Acoustics	Desired Level*	Delta – 24A	Delta – F1A
London Road - Oakcroft	96.4 dB	83 dB	70 dB	+ 26.4 dB	+ 13 dB
Labour in Vain Rd	94.5 dB	82 dB	70 dB	+ 24.5 dB	+ 12 dB
Hilltop Hotel	89.4 dB	80 dB	70 dB	+ 19.4 dB	+ 10 dB

Table 1: Low Frequency Noise from Stage 2 * façade level

- 3.9 A façade noise level of 70 dB typically equates to 67 dB free-field, where the reflecting plane obstructs the direction of sound propagation from the source. Hence the values in the two right hand columns should be increased by 3 dB where this applies.
- 3.10 As can be seen from the above values, noise arising from the proposed festival would significantly exceed the desired façade level of 70 dB L_{Zeq} 63 Hz.

4.0 CONCLUSIONS

- 4.1 It is considered very likely that the proposed event will result in substantial low frequency noise levels at the nearest properties to the north.
- 4.2 It is 24 Acoustics' opinion that, if the licence were permitted without any practicable noise mitigation measures, noise levels affecting the nearest properties would amount to public nuisance as defined by the Licensing Act (2003). This would place the local authority in a difficult position as the licensing authority that would have allowed consent for the event but also as the investigating authority.
- 4.3 On the basis of the above, it is recommended that the applicant be invited to investigate practicable noise control measures to avoid the substantial noise impact to nearby properties.
- 4.4 Should the event go ahead, 24 Acoustics recommends that low frequency music noise levels be controlled to 70 dB L_{Zeq} 63 Hz (1/1 Octave), 5 minutes at the nearest affected sensitive properties.

I trust the above is in order.

Yours sincerely,
For 24 Acoustics Ltd

Steve Gosling BEng (Hons) MIOA MAES
Principal Consultant

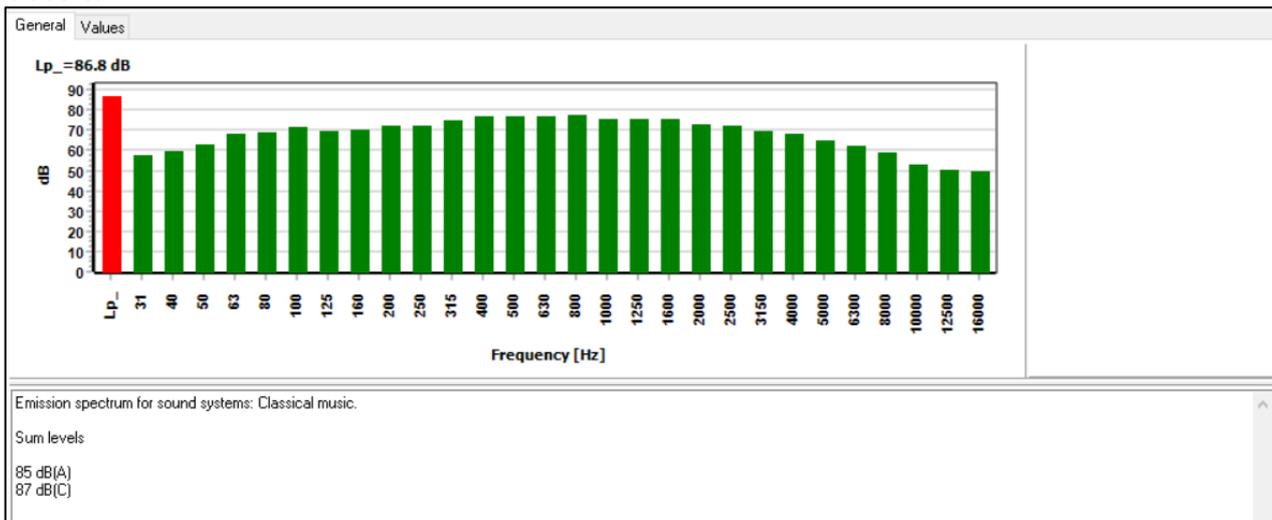
FIGURE 1 – SITE LOCATION PLAN

Nearest properties

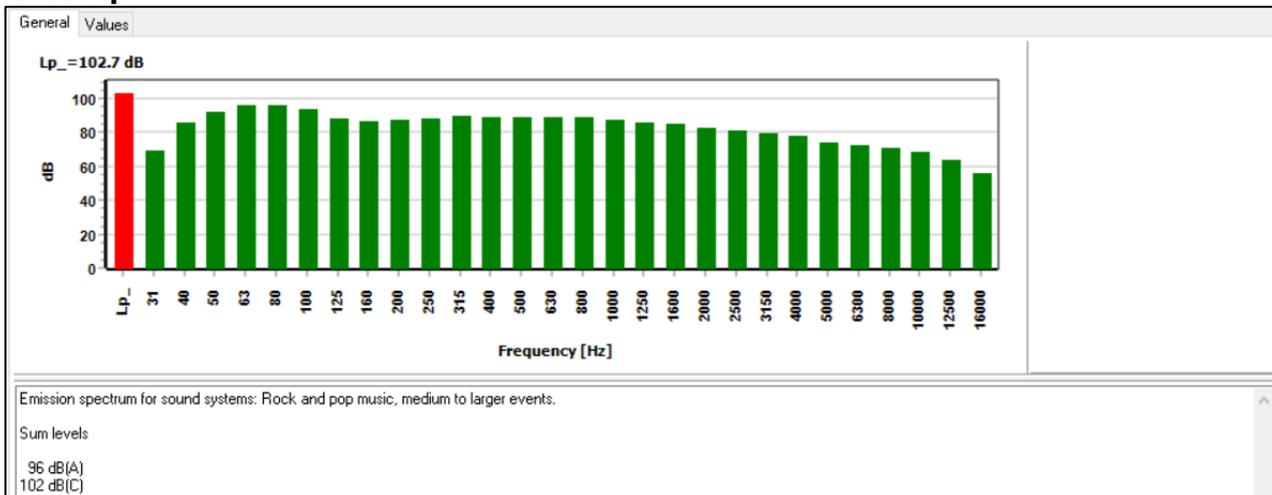


FIGURE 2 – ILLUSTRATIVE MUSIC SOURCE SPECTRA

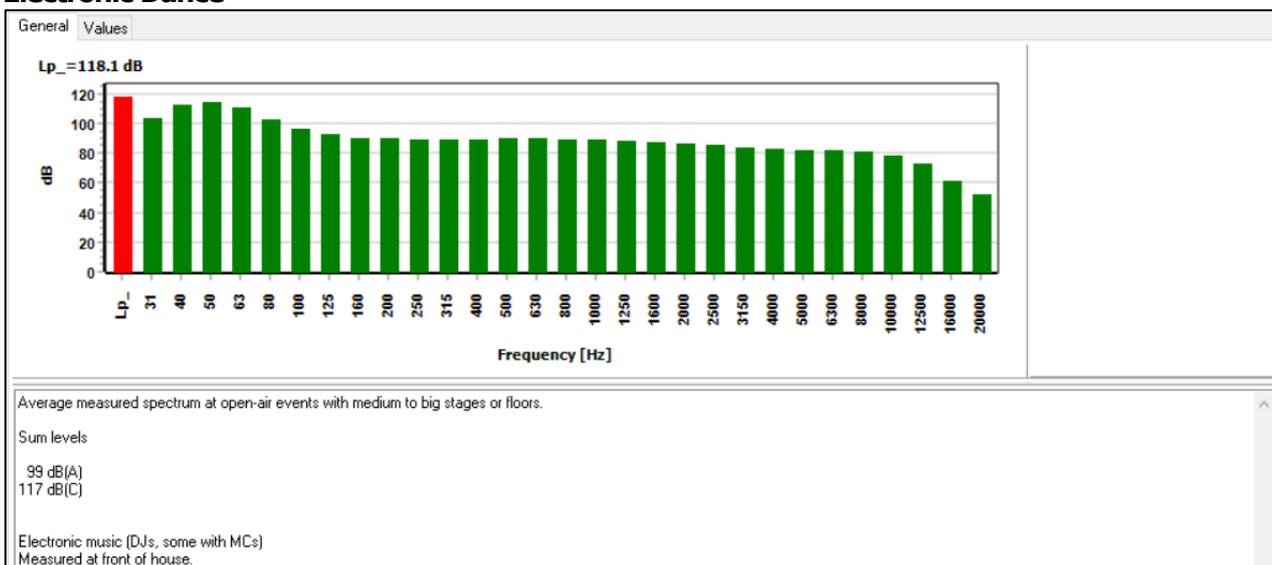
Classical



Rock Pop



Electronic Dance



APPENDIX A – ACOUSTIC TERMINOLOGY

Noise is defined as unwanted sound. The range of audible sound is from 0 to 140 dB. The frequency response of the ear is usually taken to be around 18 Hz (number of oscillations per second) to 18000 Hz. The ear does not respond equally to different frequencies at the same level. It is more sensitive in the mid-frequency range than the lower and higher frequencies and because of this, the low and high frequency components of a sound are reduced in importance by applying a weighting (filtering) circuit to the noise measuring instrument. The weighting which is most widely used and which correlates best with subjective response to noise is the dBA weighting. This is an internationally accepted standard for noise measurements.

For variable sources, such as traffic, a difference of 3 dBA is just distinguishable. In addition, a doubling of traffic flow will increase the overall noise by 3 dBA. The 'loudness' of a noise is a purely subjective parameter, but it is generally accepted that an increase/ decrease of 10 dBA corresponds to a doubling/ halving in perceived loudness.

External noise levels are rarely steady, but rise and fall according to activities within an area. In attempt to produce a figure that relates this variable noise level to subjective response, a number of noise indices have been developed. These include:

- i) The L_{Amax} noise level - This is the maximum noise level recorded over the measurement period.
- ii) The L_{Aeq} noise level - This is "equivalent continuous A-weighted sound pressure level, in decibels" and is defined in British Standard BS 7445 as the "value of the A-weighted sound pressure level of a continuous, steady sound that, within a specified time interval, T, has the same mean square sound pressure as a sound under consideration whose level varies with time".

It is a unit commonly used to describe construction noise and noise from industrial premises and is the most suitable unit for the description of other forms of environmental noise. In more straightforward terms, it is a measure of energy within the varying noise.

- iii) The L_{A10} noise level - This is the noise level that is exceeded for 10% of the measurement period and gives an indication of the noisier levels. It is a unit that has been used over many years for the measurement and assessment of road traffic noise.
- iv) The L_{A90} noise level - This is the noise level that is exceeded for 90% of the measurement period and gives an indication of the noise level during the quieter periods. It is often referred to as the background noise level and is used in the assessment of disturbance from industrial noise.

APPENDIX B – QUALIFICATIONS AND EXPERIENCE: STEVE GOSLING

Steve Gosling is a Director and Principal Consultant of 24 Acoustics Limited, Southampton, a firm of consulting engineers specialising in acoustics and environmental noise.

Mr Gosling holds a BEng degree in Engineering Acoustics and Vibration from the Institute of Sound and Vibration Research (ISVR) at Southampton University. He is a corporate member of the Institute of Acoustics and also the Audio Engineering Society. He is a former Vice Chairman of the Association of Noise Consultants and former Chairman of the Association of Noise Consultants' Membership Steering Group. He is also a former Secretary of the Southern Branch of the Institute of Acoustics.

He has specialised as an independent consulting engineer in environmental noise for approximately twenty five years. Mr Gosling has managed music noise from several large scale events, including Carfest (north and south). Prior to working in consultancy, Mr Gosling worked in research and development for a leading UK touring PA loudspeaker manufacturer.

Mr Gosling has given evidence at Planning Appeals and various Courts, including the High Court. He has also presented evidence at various local government committees both for developers and those affected by developments.

APPENDIX C

**Code of Practice on Environmental Noise
Control at Concerts**

THE NOISE COUNCIL

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1.0 INTRODUCTION

- 1.1 Large music events involving high powered amplification are held in sporting stadia, arenas, open air sites and within lightweight buildings. These events give pleasure to hundreds and in some cases thousands of people. However, the music from these events can cause disturbance to those living in the vicinity. The purpose of this code is to give guidance on how such disturbance or annoyance can be minimised.
- 1.2 This Code of Practice has been prepared by the Noise Council through a Working Party comprising specialists who are experienced in the particular problems that can arise with environmental noise control at concerts and similar music events. A list of members of the working party is shown in Appendix II and a list of technical papers providing some background data and more detailed information is given in Appendix I.
- 1.3 Various guidelines and criteria are described in this document covering a range of events from the single occasional concert to a full season. It is believed that compliance with the guidelines and the other advice given here will enable successful concerts to be held whilst keeping to a minimum the disturbance caused by noise. It is recognised, though, that full compliance with this code may not eliminate all complaints, and local factors may affect the likelihood of complaints.
- 1.4 This Code is not designed to address the question of environmental noise arising from discotheques, clubs and public houses, nor environmental noise affecting noise sensitive premises which are structurally attached to the venue.
- 1.5 This Code is designed to assist those planning a music event, those responsible for licensing such events and those responsible for enforcing the nuisance provisions of the Environmental Protection Act 1990 (England and Wales) and the Control of Pollution Act 1974 (Scotland). It addresses the environmental problem of noise from the performance and sound checks only. Other environmental impacts of concerts and the question of meeting the requirements of the Noise at Work Regulations 1989 and the guidance given in the Health and Safety Executive's Guide to Health, Safety and Welfare at Pop Concerts and similar events are beyond the scope of this document.
- 1.6 Compliance with this Code of Practice does not of itself confer immunity from legal obligations.
- 1.7 The Noise Council is keen to receive accounts of the practical application of the Code in order to improve and enhance its content.

2. DEFINITIONS

2.1	Background Noise Level:	The prevailing sound level at a location, measured in terms of the $L_{A90,T}$ on an equivalent day and at an equivalent time when no concert or sound checks are taking place.
	dB(A):	The A-weighted sound pressure level whereby various frequency components of sound are weighted (equalised) to reflect the way the human ear responds to different frequencies.
	Delay Tower:	An additional set of loudspeakers employed to provide a better spread of sound to the audience.
	L_{Aeq}	The equivalent continuous noise level which at a given location and over a given period of time contains the same A-weighted sound energy as the actual fluctuating noise at the same location over the same period.
	$L_{A90,T}$	The A-weighted sound pressure level exceeded for 90% of the Measuring period (T).
	Mixer:	The location where the main sound system is controlled. As Well as ensuring the correct sound balance between the various performers, the overall level of sound for the audience is controlled at this location.
	Music Event:	A concert or similar event where live or recorded music is performed by a solo or group of artists before an audience.
	Music Noise:	The noise from the music and vocals during a concert or sound Checks and not affected by other local noise sources.
	Music Noise Level (MNL):	The L_{Aeq} of the music noise measured at a particular location.
	Noise Consultant:	A person given responsibility by the organiser of the event for monitoring noise levels in accordance with the prevailing Conditions, and who has the ability and authority to make decisions and implement changes in noise level during the event.
	Noise Monitoring Position:	The location of the microphone within the venue from which the level of sound is monitored and controlled. For outdoor venues, this location tends to be at the mixer.
	Noise-sensitive Premises:	Includes premises used for residential purposes hospitals or similar institutions, education establishments (when in use), or places of worship (during recognised times and days of worship) or any premises used for any other purposes likely to be affected by the Music Noise.

Other Urban Venue:	An urban park or similar area which is not normally used for major organised events.
Rural Venue:	A park, open space or grounds of a country house in a rural area not normally used for major organised events.
Sound Engineer:	Person employed to control the sound quality of the music for the audience.
Urban Stadia or Arenas:	A regular venue for major sporting or similar events in an urban area.

3. GUIDELINES

- 3.1 The Music Noise Levels (MNL) when assessed at the prediction stage or measured during sound checks or concerts should not exceed the guidelines shown in Table 1 at 1 metre from the façade of any noise sensitive premises for events held between the hours of 09.00 and 23.00.

TABLE 1

Concert days per calendar year, per venue	Venue Category	Guideline
1 to 3	Urban Stadia or Arenas	The MNL should not exceed 75 dB(A) over a 15 minute period
1 to 3	Other Urban and Rural Venues	The MNL should not exceed 65 dB(A) over a 15 minute period
4 to 12	All Venues	The MNL should not exceed the background noise level by more than 15 dB(A) over a 15 minute period

Notes to Table 1

- The value used should be the arithmetic average of the hourly L_{A90} measured over the last four hours of the proposed music event or over the entire period of the proposed music event if scheduled to last for less than four hours.
 - There are many other issues which affect the acceptability of proposed concerts. This code is designed to address the environmental noise issue alone.
 - In locations where individuals may be affected by more than one venue, the impact of all the events should be considered.
 - For those venues where more than three events per calendar year are expected, the frequency and scheduling of the events will affect the level of disturbance. In particular, additional discharges can arise if events occur on more than three consecutive days without a reduction in the permitted MNL.
 - For indoor venues used for up to about 30 events per calendar year an MNL not exceeding the background noise by more than 5 dB(A) over a fifteen minute period is recommended for events finishing no later than 23.00 hours.
 - Account should be taken of the noise impact of other events at a venue. It may be appropriate to reduce the permitted noise from a concert if the other events are noisy.
 - For venues where just one event has been held on one day in any one year, it has been found possible to adopt a higher limit value without causing an unacceptable level of disturbance.
- 3.2 For events continuing or held between the hours 23.00 and 09.00 the music noise should not be audible within noise-sensitive premises with windows open in a typical manner for ventilation.

Notes to Guidelines 3.2

1. The use of inaudibility as a guideline is not universally accepted as an appropriate method of control. References 6 & 7 (Appendix 1) set out the various issues. This guideline is proposed as there is insufficient evidence available to give more precise guidance.
2. Control can be exercised in this situation by limiting the music noise so that it is just audible outside the noise sensitive premises. When that is achieved it can be assumed that the music noise is not audible inside the noise sensitive premises.

- 3.3 The nature of music events means that these guidelines are best used in the setting of limits prior to the event (see 4.0).
- 3.4 Assessment of noise in terms of dB(A) is very convenient but it can underestimate the intrusiveness of low frequency noise. Furthermore, low frequency noise can be very noticeable indoors. Thus, even if the dB(A) guideline is being met, unreasonable disturbance may be occurring because of the low frequency noise. With certain types of events, therefore, it may be necessary to set an additional criterion in terms of low frequency noise, or apply additional control conditions.

Notes to Guideline 3.4

1. It has been found that it is the frequency imbalance which causes disturbance. Consequently there is less of a problem from the low frequency content of the music noise near to an open air venue than further away.
 2. Although no precise guidance is available the following may be found helpful (Ref.8): A level up to 70 dB in either of the 63 Hz or 125 Hz octave frequency band is satisfactory; a level of 80 dB or more in either of those octave frequency bands causes significant disturbance.
- 3.5 Complaints may occur simply because people some distance from the event can hear it and that, consequently, they feel the music must be loud even though the guidelines are being met. In fact topographical and climatic conditions can be such that the MNL is lower at locations nearer to the venue.
- 3.6 Although care has been taken to make these guidelines compatible with what occurs at existing venues, this may not be the case at every location. Where arrangements are satisfactory with either higher or lower noise levels than those contained in the guidelines, these limits should continue.
- 3.7 It has been found that if there has been good public relations at the planning stage between the event organisers and those living nearby, annoyance can be kept to a minimum.
- 3.8 The music noise level should be measured using an integrating-averaging sound level meter complying with type 2 or better of BS6698. The background noise level should be measured using a sound level meter complying with type 2 or better of BS5969. Time weighting F (fast response) should be used.
- 3.9 When measuring L_{Aeq} in order to determine the music noise level, care must be taken to avoid local noise sources influencing the result. When the local noise is intermittent, a series of short term L_{Aeq} measurements should be made of the music noise while the local source is absent or has subsided to typically low or mean minimum values. An average of these short term readings will give an estimate of the music noise level. A further option would be to measure the A-weighted sound pressure level on a sound level meter complying with type 2 or better of BS5969 with the time weighting set to S (slow response) when the music is loudest and not influenced by local noise. If the local source is continuous, make a measurement of the L_{Aeq} of the local source when the music is not occurring, and make a correction to the measured L_{Aeq} when the music is occurring to obtain an estimate of the music noise level.
- 3.10 The nature of many concerts requires the sound volume level to be increased during the event to enhance the performance. The prevailing noise control restrictions should be

borne in mind so that the sound volume at the start of the event is not too high, hence allowing scope for an increase during the event.

- 3.11 Some concerts are accompanied by associated activities (eg fairgrounds) which can be noisy. These should be taken into account when setting the limit for the music noise level.
- 3.12 When monitoring the music noise level, the sound of the audience applause can be a significant contributor. It is not possible to address this issue precisely; instead it is recommended that any such effect be noted.

4.0 **RECOMMENDED NOISE CONTROL PROCEDURE**

4.1 This procedure has been developed over several years and found to provide an effective means of addressing the problem of environmental noise control at events. The main features of the procedure are set out below and references are made to various technical papers which give more details.

Planning

- 4.2 Determine the sound propagation characteristics between the proposed venue and those living nearby who might be affected by noise, and carry out an appropriate background noise survey. This should be undertaken by a competent person who is experienced in noise propagation and control, particularly from music events.
- 4.3 Check the viability of the event against the relevant guideline levels. This is achieved by determining from 4.2 above the sound level experienced by the audience which would allow the guidelines to be met. Research shows that the music noise level in the audience by the mixer position at pop concerts is typically 100 dB(A), and that levels below 95 dB(A) will be unlikely to provide satisfactory entertainment for the audience.
- 4.4 Prospective licensees should give the local authority as much notice as possible of the proposed event especially if more than one event is planned during a calendar year.
- 4.5 The local authority should make use of licensing conditions and statutory powers to implement the procedures described in this Code of Practice. Examples of possible conditions are given in Appendix III.
- 4.6 The Noise Consultant should be appointed.

Before the Event

- 4.7 Install the loudspeaker system early enough to enable alignment and orientation to be optimised to minimise noise disturbance.
- 4.8 Carry out a sound test prior to each event to ascertain the maximum level that can prevail at the monitoring position to enable the guidelines to be met. This effectively calibrates the system, taking into account as far as possible prevailing weather conditions, and, for indoor events, the sound insulation of the venue.

Notes to Guideline 4.8

1. It should be remembered that the introduction of an audience to a venue increases the acoustic absorption present. This has the effect of reducing the sound level in the venue for a given amplifier setting compared with the sound test. This should be borne in mind when setting the limit levels.

During the Event

- 4.9 Advertise and operate an attended complaint telephone number through which noise complaints can be channelled. This will enable an immediate response to the complaints to be given and the Noise Consultant to judge whether or not any adjustment to the music noise level is needed.

- 4.10 Establish a communication network between all those involved in noise control. This should include the local police authority.

Note to Guideline 4.10

It is difficult to communicate effectively in noisy environments, especially in the vicinity of the mixer. It has been found helpful for those involved in the communication network to use head-sets with their two way radio systems.

- 4.11 Carry out noise monitoring within the venue at the noise monitoring position and at sample locations outside the venue throughout the event. If the event is employing one or more delay towers, additional noise monitoring may be needed inside the venue to control the sound output from them.
- 4.12 Although the limit value set at 4.8 above would be in terms of 15 minute L_{Aeq} useful control can be exercised by monitoring the L_{Aeq} over one minute periods. This enables an early warning to be obtained of possible breaches in the 15 minute limit. It is sometimes appropriate to set an additional control limit in terms of the one minute L_{Aeq} (typically some 2-3 dB(A) above the 15 minute value) and to use a level recorder display to assist the sound engineer in checking compliance with the limit. The Noise Consultant should advise the sound engineer of any breaches in the prescribed noise limit, to enable a reduction in level as appropriate. The sound engineer should also be advised of occasions when the limit has only just been met.

Appendix I

References

1. Noise Control Techniques and Guidelines for Open Air Concerts, J.E.T. Griffiths (ProcIOA, Vol. 7, Part 3, 1985)
2. A Noise Control Procedure for Open Air Pop Concerts, J.E.T. Griffiths, S.W.Turner and A.D.Wallis (ProcIOA, Vol 8, Part 4, 1986)
3. Noise Control in the Built Environment, edited by John Roberts and Diane Fairhall, Gower Technical, 1988 (Chapters 1, 2 and 3)
4. Environmental Noise Guidelines proposed for the new Health & Safety Executive Guide for Pop Concerts, J.E.T. Griffiths and A. Dove (ProcIOA, Vol 14, Part 5, 1992)
5. A Survey of Sound Levels at Pop Concerts, J.E.T. Griffiths (HSDE Contract Research Report No 35/1991)
6. Inaudibility – an Established Criterion, A.W.M. Somerville (ProcIOA. Vol 13, Part 8, 1991)
7. Noise Control at All-night Acid House Raves, K. Dibble (ProcIOA, Vol 13, Part 8, 1991)
8. A study of Low Frequency Sound from Pop Concerts, J.E.T. Griffiths, J. Staunton and S.Kamath (ProcIOA, Vol 15, Part 7, 1993)

Appendix II

Noise Council Working Party Membership

S.W.Turner	Technical Director, TBV Science
A Somerville	Department of Environmental Health, City of Edinburgh District Council
A D Wallis	Cirrus Research Limited
J Bickerdike	Leeds Polytechnic
K Dibble	Ken Dibble Acoustics
J.E.T. Griffiths	Director, Travers Morgan Environment
S.S. Kamath	Director, Pollution & Scientific, London Borough of Brent
J Sargent	Building Research Establishment
J Staunton	Associate, Travers Morgan Environment

Appendix III

**Sample Conditions Concerning
Environmental Noise Control at Concerts**

- 1.0 The licensee shall appoint a suitably qualified and experienced noise control consultant, to the approval of the Licensing Authority, no later than _____ weeks prior to the event. The noise control consultant shall liaise between all parties including the Licensee, Promoter, sound system supplier, sound engineer and the licensing authority etc on all matters relating to noise control prior to and during the event.
- 2.0 it not already carried out, the noise control consultant shall carry out a survey to determine the background noise levels (as defined by the Code of Practice on Environmental Noise Control at Concerts) at Locations around the venue representative of the noise sensitive premises likely to experience the largest increase in noise/highest noise level as a result of the concert. The information obtained from this survey shall be made available to the licensing authorityweeks prior to the event.
- 3.0 A noise propagation test shall be undertaken at least hours prior to the start of the event in order to set appropriate control limits at the sound mixer position. The sound system shall be configured and operated in a similar manner as intended for the event. The sound source used for the test shall be similar in character to the music likely to be produced during the event.
- 4.0 The control limits set at the mixer position shall be adequate to ensure that Music Noise Level (MNM) shall not at any noise sensitive premises exceed dB(A) over a 15 minute period/the background noise level by more than dB(A) over a 15 minute period* throughout the duration of the concert.
- 5.0 The control limited set at the mixer position shall be adequate to ensure that the MNL shall not at any noise sensitive premises exceed dB(A) over a 15 minute period/the background noise level by more than dB(A) over a 15 minute period* throughout any rehearsal or sound check for the event.
- 6.0 The Licensee shall ensure that the promoter, sound system supplier and all individual sound engineers are informed of the sound control limits and that any instructions from the noise control consultant regarding noise levels shall be implemented.
- 7.0 The appointed noise control consultant shall continually monitor noise levels at the sound mixer position and advise the sound engineer accordingly to ensure that the noise limits are not exceeded. The Licensing Authority shall have access to the results of the noise monitoring at any time.
- 8.0 Rehearsals and sound checks are permitted only between the following hours:
, hrs to hrs.
- 9.0 Music from the event is permitted only between the following hours:
 hrs to hrs

Note: Suitable noise conditions should also be considered with respect to minimising noise exposure to the audience and people working at the event as advised in the HSE document “Guide to Health, Safety and Welfare at Pop Concerts and Similar Events”.

The Noise Council

The Noise Council was established by a group of professional bodies concerned with problems relating to noise and vibration in the community and industrial environments. Its aims and objectives are to promote and respond to issues relating to noise and vibration, and to make independent technical and scientific expertise available to international and national agencies, central and local government, commerce and industry.

The Founding Bodies are:

- The Chartered Institute of Environmental Health
- The Institute of Acoustics
- The Royal Environmental Health Institute of Scotland
- The Institute of Occupational Safety & Health

BRITISH WEATHER SERVICES – METEOROLOGICAL VERIFICATION REPORT:

Weatherview House, 50 Beaumont Way, Hazlemere, High Wycombe, Bucks, England. HP15 7BE.

Tel: 07860 912216. Email: legal@britishweatherservices.co.uk. Web: www.britishweatherservices.co.uk

TO -: TO WHOMEVER IT MAY CONCERN.

Subject: METEOROLOGICAL ASSESSMENT REPORT, CONCERNING THE SITING OF A FESTIVAL AND THE POTENTIAL OF WEATHER RELATED IMPACTS, BETWEEN THE MONTHS OF MAY AND AUGUST, ON THE ST.CLERE ESTATE, KEMSING, SEVONOAKS.

BWS ref: 2099

Date: 12th July 2021

STATEMENT:

I am JIM N R DALE, senior meteorological observer at British Weather Services, the UK's longest established independent meteorological provider; established in 1987. I have been requested by MR. HARRY BOTT, CHAIRMAN OF STANSTED PARISH COUNCIL to prepare an assessment report in pursuant of his instructions. The purpose of this report is to review and conclude upon the potential for impacting weather in relation to the proposed siting of a festival, between the months of MAY and AUGUST, on the ST.CLERE ESTATE, KEMSING, SEVONOAKS.

Experience and Qualifications of Author:

I gained my meteorological observers qualification in the Royal Navy in 1982 and served on various ships and land based stations until late 1985 - observing, plotting and providing meteorological data & forecasts for aircrews and others. I then served for 2 years as a meteorological consultant at Noble Denton in London, observing, plotting and forecasting the weather globally. In December 1987 I formed my own company, namely British Weather Services; and amongst a host of differing meteorological tasks since, I have provided expert witness meteorological reports, site investigations and evidence to courts, insurance companies and other concerns on numerous occasions to-date. During the past 10 years I have gained daily experience of assessing, predicting and logging of weather conditions at site specific global stadia for numerous sporting concerns; and during the recent past I provided my services to the Ford World Rally team, observing and forecasting weather and road conditions for the team, which involved accounting for and prediction of rainfall impact and ice formation/cessation on road surfaces. I have also provided expert meteorological opinion to the broadcast media (radio, TV and newspapers) on many occasions, as I am perceived as being very knowledgeable within my industry, both in the UK and abroad. Of late, I have published a business book entitled 'Weather or Not?' - in which a chapter is devoted to the subject of various weather impacts and legal disputes.

THE BACKGROUND: In evaluating the weather potential for the said site, my remit is investigate and comment upon the **safety issues** and any other **weather-related considerations** of holding a festival at this site during the months May to August. To a lesser degree, I will also comment upon the issues relating to environmental noise potential.

The climate weather station records of Edenbridge (appx. 13 miles SW of the intended site) and Maidstone (appx. 13 miles ESE of the intended site) have been utilised to identify the average regional conditions, along with more specific weather occurrences. Whilst these stations may not necessarily identify specifically with the St. Clere Estate or any one-off regional weather events per se, they do provide a fair and reasonable assessment of the regional weather trends over time.

EDENBRIDGE & MAIDSTONE 2020 RAINFALL: (25mm = appx. 1 inch)

	Edenbridge:	Maidstone
May:	7mm	2mm
June:	61mm	33mm
July:	32mm	33mm
August:	62mm	58mm

EDENBRIDGE PEAK WIND GUSTS 2020: (gale force gusts begin at 35mph)

May:	36mph
June:	32mph
July:	30mph
Aug:	32mph

EDENBRIDGE MAY 2021: (June/July/Aug not yet available).

Rainfall 85mm = 135% of long term average. Peak wind gust = 45mph.

EDENBRIDGE JULY 2019 (A VERY WET MONTH): Rainfall **151.5mm/289%** of long term average. 52.0mm fell on the 10th as a consequence of heavy sustained rain. There were **10 rain days** in the month in excess of 1.0mm. Numerous weather stations both in Kent and across neighbouring counties reported similarly. The peak wind was recorded at 31mph on the 8th.

EDENBRIDGE 1981-2010 LONG TERM MONTHLY AVERAGE RAINFALL AMOUNTS & NUMBER OF RAIN DAYS (+1mm)

May:	53.4mm/9.1
June:	45.3mm/8.4
July:	46.9mm/7.7
Aug:	52.9mm/7.7

EDENBRIDGE WIND DIRECTION MAY TO AUGUST 2020:

From the...

N 10%
NE 10%
E 9%
SE 4%
S 13%

SW 23%

W 22%

NW 9%

EDENBRIDGE LONG TERM WIND DIRECTION MAY 2000 TO AUGUST 2020:

From the...

N 10%
NE 11%
E 8%
SE 6%
S 15%

SW 20%

W 21%

NW 9%

MY SITE INVESTIGATION:

During the late morning and early afternoon of Sunday 11th July and accompanied by Mr. Harry Bott, I visited and toured the proposed site for the festival and the regional area in general, on foot and by car. I was also shown the proposed car park area for the festival. The weather during my visit was dry and fair to cloudy with light winds. Underfoot conditions were mostly dry.

According to Ordnance Survey, the site where the proposed festival is to take place is at an approximate height above sea level of between 220 and 230 metres. The site is immediately adjacent to the A20 and lies in close proximity to the Wrotham radio mast, which towers above the field to the west-northwest, at a mean sea level height of 219 metres (according to *mb 21 UK Broadcast Transmission*.) It should be noted that radio towers for good reasons tend to be located at high or quite often the highest vantage points, which in this case confirms the higher level height exposure of the nearby proposed site.

The field itself could be fairly considered to be relatively open and exposed, with an undulating agricultural surface and several batches of mature trees on the periphery. The A20 and the buildings opposite give the impression of the field being somewhat less exposed, but from certain vantage points, it is evident that the site is atop a ridgeway that overlooks a large lower elevation expanse lying to the west, southwest and south, towards Biggin Hill, Sevenoaks and Tonbridge respectively. Moving beyond the field boundaries to the north and although not evident from the field itself, there is also expansive exposure all the way to the River Thames and East London.

I also viewed the proposed car park field via the single-track Terry's Lodge Road. This particular field contained a lengthy deep trough running through the middle, with higher ground on the entry point and on the south-eastern side.

MY CONCLUSION:

It would be fair to say that outside events held during *clement weather* in open fields, irrespective of their exposure and height above sea-level could be held without concern for the safety of the organisers and attendees. During average summer months, that would ordinarily be for the vast majority of the time period, albeit it may not be so hospitable at times of colder temperatures, rain, drizzle and higher winds.

However, when considering the safety aspects of weather, the focus must be upon the weather's potential to be hazardous/dangerous, which directly relate to the proposed site. In that respect, and in relation to the proposed site in question, I do have certain concerns.

The first and possibly the most important for your consideration is the exposure to thunderstorms and possible lightning activity. Thunderstorms are more prevalent during the summer months and by their very nature are more common in and around higher ground, due to the updrafts of warm unstable air from the surrounding lower plains. Given the local and regional topography, I would consider the proposed site to be within a relatively high-risk area. Also, the surrounding trees would offer a dangerous shelter lure during thundery downpours. Indeed, easy and accessible 'safe zones' from any overhead thunderstorm situation appear few and far between.

Turning to possible heavy rainfall events. It is beyond my professional remit to comment upon the ground soil and the natural drainage of the proposed site. Nevertheless, a very heavy or sustained rain event combined with large crowds would almost certainly make the field *uncomfortable* underfoot (think Glastonbury in the mud) but that is as far as I am able to comment. However, the proposed car park is a somewhat different matter. In this case it is evident to me that the 2 x slopes would funnel heavy or sustained rainwater into the middle trough making for potentially deep standing water in the worst of rainfall cases. Meanwhile, the relatively steep slopes either side would almost certainly turn greasy/muddy under the weight of passing vehicles during the same event. Again, any preventative measures that may be taken fall out of my professional remit to comment upon, but left in a natural state as I viewed, any significant rainfall would in my view make the field as a car park implausible.

From a wind perspective, the summer months do not normally offer up gales or storms, but as we can see from the average conditions, even at the lower levels windy days can and do occur and this higher level and exposed location will be more prone to higher velocity winds than surrounding towns and villages, particularly from the main prevailing directions of the southwest and west (see average charts).

Finally, I do not consider ambient noise to be a safety or practical issue for the organisers, beyond the potential impact upon local residents. Weather elements in terms of wind speed and direction, relative humidity and rainfall can enhance or suppress noise levels, with dry days in light winds and low humidity more likely to carry sound from the source further afield.

Reference Sources: The Climatological Observers Link, editions May to August 2020; Meteorological Office Climate records; Google Maps, Ordnance Survey.

**I believe the data/information contained within the reference publications to be independent and entirely useful in determining the issues referred to within my report.*

STATEMENT OF TRUTH: I confirm that insofar as the facts stated in my report are within my own knowledge, I have made clear which they are and I believe them to be true and the opinions I have expressed represent my true and complete professional opinion. I understand that my overriding duty is to assist the Court on matters within my expertise and that this duty overrides any obligation to STANSTED PARISH COUNCIL, or their CHAIRMAN. I confirm that I have complied with that duty and will continue to do so and that I am aware of the requirements set out in Part 35 of the Civil Procedure Rules and the accompanying Practice Direction, the Guidance for the instruction of experts in civil claims 2014 and the relevant Pre-action Practice Direction/Protocol.

Signed as printed on the 12th July 2021

Jim N R Dale
Senior Meteorological Observer
British Weather Services

[Suspect Spam] [SUSPICIOUS MESSAGE] Objection to Objection to Wings Of the Morning ...



Reply Reply All Forward ...

Fri 16/07/2021 16:19

Licensing

You replied to this message on 19/07/2021 08:16.

Dear Mr Garnett,

There is no way that there is sufficient infra structure in a tiny rural village to support such a huge series of events that would overrun our tranquil piece of countryside with devastating effects.

Please can the detrimental impact to the lives of local people be considered when looking at these impractical applications.

Loud music and massive crowds bring traffic, littering, drink, drugs, and often crime. This impacts the well being and safety of the local residents who wish to enjoy the ability to live and work without thousands of people inundating the locality.

As per my previous objection correspondence, we are highly likely to be further ramifications as Lucy's Barn Field would probably be used as camping for people attending the loud event.

Thank you for taking my objections on board.

Yours sincerely,

Representation in respect to the application for 14th August 2021 – Matts BBQ 2021 – Mu...



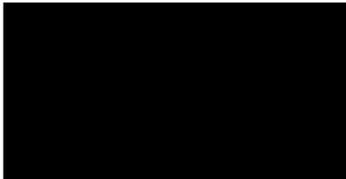
Reply Reply All Forward ...

Fri 16/07/2021 16:47

We wish to object to this license application. The event proposed will result in high levels of noise pollution and other disturbance for a prolonged period which will be a public nuisance for local residents, can prove harmful to their mental health, and can affect local livestock and wildlife. High noise levels are also likely to prevent children from getting to sleep. The set up and take down for the event will cause further disturbance for the local community.

We believe that the increase in traffic levels in the local area as a result of this event and the proposed parking would constitute a major safety issue in terms of cars arriving and leaving, being parked in fields already prone to flooding, exiting a narrow lane that can get blocked and flood, or onto the A20 which suffers daily congestion already when traffic levels rise even to levels still well below those such an event would produce.

We are also concerned about safety and public nuisance implications of the high potential for antisocial behaviour in the local area resulting from the sale and consumption of alcohol at the event and risk of drug abuse.



TN15 7NY

15th July 2021

FOA Anthony Garnett

Tonbridge & Malling Licencing Department

Re: BJP Productions Festival Licence application

I wish to make a representation to the above application to hold a festival from the 14th August 2021

My objections come under the following points:

The prevention of crime and disorder

- Due to the sheer scale and type of this proposed event, it's impossible to guarantee there will be no occurrences of crime or violence inside or outside 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 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, 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. 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 ¼ of a mile (1.2km) from the M20 exit. 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 in recent years on the same stretch of M20, caused by stationary vehicles which resulted in 2 fatalities.
- Access to the parking areas other than the main Wings of the morning field are a via single 12ft field gates for both entrance and exit – the entrances by the tower access track 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
- Tower access track – You will remember from the previous application that this track is in constant use and must be kept clear for access by the Aquiva that operate the site which is a UK emergency transmission station. This access track is a single track road that is only 8ft wide 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. Have Aquiva been notified?

- Tower Industrial site – The tower industrial site is situated immediately opposite the event main site entrance, 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. I spoke with various businesses on the site and no one has been notified.
- Danger to other road users - Terrys Lodge road is a small single track 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 field has the potential of causing a collision to other road users.
- The proposed parking field Terrys Lodge Rd – This field is accessed via Terrys Lodge Road, with a very acute angle to a singular 3.6m field gate. 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 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 regularly forms a large body of water at the bottom. I'm sure by now you have seen pictures of this lake. 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.
- 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. We all have serious concerns over the impact this will have on the ability of emergency vehicles to access the event parking areas with its limited access and the surrounding area.
- Personal safety of my family – My property would be completely surrounded by this event. I have concerns of the safety of myself and property. There is no indication that there would be any fencing around mine of my neighbour's property so a huge volume of cars would be effectively parked very close to our houses and fence line. I have 2 large German shepherd dogs that could potentially injure anyone that got near the fence. There is a high potential for fire and there is only the proposal for hand held fire extinguishers that will be useless against a vehicle fire. There is also risk of projectiles from being thrown from the parking area.

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
- Light – There will be artificial lighting.
- 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.

The protection of children from harm

- Bus Stops - There are four bus stops in the immediate vicinity of the proposed event on the A20

Environmental impact

- Rubbish – There will inevitably be large amounts of rubbish created at this site, as a direct result of the proposed event. 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 parking. 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 plan document submitted with this application is completely inadequate in all areas which has clearly just been copy and pasted from other generic documents and contains no details. The organisers have obviously not visited the site which is not suitable for such a large event

The application is vague and contradicts itself. It mentions various other days and bank holidays other than the 14th of August so clearly a vailed attempt to get an open licence going forward with no restrictions.

There are various different site maps, one of which includes my own field as a parking area.

As a close property to this event I have had no notifications of this application. There has been no siting of the required application notices around the perimeter of the event which includes my boundary fence, which I believe is a mandatory requirement.

I cannot see how a licence can even be considered with such poorly planned event.

Regards



██████████
██████████
██████████
TN157EB

14 July 2021

To the Licensing authority
Tonbridge & Malling Council
Gibson Building
Gibson Drive
West Malling
Kent
ME194LZ

Re: BJP Productions Ltd Licence Application for the Wings of the Morning Fields, TN157NS.

For the attention of Antony Garnett.

I live at the above address which is surrounded by the proposed application.

It has come to my attention that the applicant for a licence for Matts BBQ has not fulfilled their obligations to put a blue notice 50 metres along the highway.

I have personally walked the entire perimeter of the site and only two of these have been put in place as indicated by 2 blue dots on the attached map. One on the gate at Terrys Lodge Road and one on the main gate on the London road by the M20 exit.

The relevant provision in the regulations (Licensing Act 2003 (Premises Licences And Club Premises Certificates) Regulations 2005 (SI 2005/42)) is as follows:

'25 [Advertisement of applications by applicant]

In the case of an application for a premises licence under section 17 [..] the person making the application¹ shall advertise the application, in both cases containing the appropriate information set out in regulation 26—

- (a) for a period of no less than 28 consecutive days starting on the day after the day on which the application was given to the relevant licensing authority, by displaying a notice,
- (i) which is—
- (aa) of a size equal or larger than A4²,
 - (bb) of a pale blue colour,
 - (cc) printed legibly in black ink or typed in black in a font of a size equal to or larger than 16;
- (ii) in all cases, prominently at or on³ the premises to which the application relates where it can be conveniently read from the exterior of the premises **and in the case of a premises covering an area of more than 50 metres square, a further notice in the same form and subject to the same requirements every fifty metres along the external perimeter of the premises abutting any highway'**

As the appropriate perimeter fence is approximately 1,500 metres long, there should be at least 30 blue signs along the perimeter.

Kind regards
██████████

