

# **Stansted Parish Council response to the Southbeats licensing application**

## **Summary**

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

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

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

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

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

# The prevention of crime and disorder

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

*Headline: Port Lympne: Three Assaulted at Southbeats*

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

Chatboard with feedback on previous Southbeats festivals:-

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

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

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

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

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

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

Source: Southbeats Google reviews

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

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

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

### **Corporate structure**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

# **Promotion of public safety**

## **Suitability of the site**

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

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

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

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

## **Emergency access**

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

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

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

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

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

## **M20 exit**

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

## **Pedestrian bridges over M20**

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

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

## **Walking and cycling dangers**

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

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

### **Weather**

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

### **Landscape**

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

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

# The prevention of public nuisance

## Traffic

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

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

### Southbeats travel assumptions.

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

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

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

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

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

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

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

Total 8,600

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

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

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



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

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

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

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

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

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

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

Using the Purple Guide data:-

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

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

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

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

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

## **Car parking charges**

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

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

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

## **Traffic Jams**

### **Entering the site on Friday afternoon and leaving on Monday Morning**

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

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

### **Leaving the site in the evening when the music stops**

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

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

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

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

Once on the A20 cars will be directed up the A20 to the Swanley Roundabout which will cause significant tailbacks.

## **Traffic lights**

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

## **Bus Parking**

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

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

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

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

## **Taxi capacity**

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

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

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

## **Light pollution**

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

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

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

## Noise

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

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

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

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

## Bar timings

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

## Effect on local businesses

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

# **The protection of children from harm**

## **School bus to Tonbridge**

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

## **Stansted School**

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

## **Drugs and loitering outside the site**

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

# In the event of agreeing this application

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

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

The following restrictions added to the licence:

**The licence should only be applicable for one year.**

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

**Reduce the licence size to maximum 12,000 people**

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

**Length of the festival**

**For 2019 only run the festival on Saturday**

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

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

**Removal of camping**

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

**Times for amplified music**

**All live and amplified music to cease at 22:30**

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

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

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

Friday and Saturday 22:30

Sunday: 21:30

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

Calculations outlined below:-

Bus to catch last train from Swanley

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

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

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

Bus to Borough Green

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

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

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

### **All bars close at 10:30**

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

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

### **Maximum level for amplified music within the Parish**

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

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

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

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

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

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

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

**No amplified music \ PAs in the campsite**

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

**Provision of traffic wardens – paid for by the festival**

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

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

**Management of traffic having access to Stansted**

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

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

**Coach company approval**

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

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



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

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

## **Planning**

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

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

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

### **Overuse of the 28 day rule**

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

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

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

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

## **Stansted concerns about the organisation**

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

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

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

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