

From: Emma Burle on behalf of Licensing
Sent: 30 May 2019 09:07:26 +0100
To: Emma Burle
Subject: FW: 19/00286/LAPRE - Wild Field events licensing application - Land SE of Tangmere Airfield
Attachments: habitat map TNP.docx

From: Clerk [clerk@tangmere-online.co.uk]
Sent: 29 May 2019 17:21
To: Licensing
Subject: 19/00286/LAPRE - Wild Field events licensing application - Land SE of Tangmere Airfield

Dear Licensing,

Tangmere Parish Council would like to make the following representations about the above premises license application:

The application seeks license to hold 28 days of events (of all types, excluding set up and take down days) with up to 4999 persons attending (it is unclear if this number includes staff present at the event). However the supporting documentation appears restricted to describing how one specific, approx. 2500 attendee, type of event might be managed. This limited scope of the supporting information raises issues as to whether this application can be appropriately assessed (against Chichester District Council's licensing objectives) for the number, type and scale of events that would be enabled if this application was permitted in full.

Specific issues relating to the Licensing Objectives:

1. Crime and Disorder.

There is potential for breaches of Wildlife and Habitat protection legislation (given the presence of ancient woodland and the relatively undisturbed rural nature of the site) from event related human activity, lighting/noise impacts, installation of fencing and making ground safe for attendee access. We note here the habitat mapping information that has accompanied the CDC Local Plan and Tangmere Neighbourhood Plan and summarised in the map attached.

Further, there is potential for unauthorised and unobserved access to the site from the north (including Tangmere village) across private land. We note that the proposed fencing on the north side of the ancient woodland and within the common land area would be particularly vulnerable to breaches given its limited visibility from the main event activities/camping/parking areas.

2. Public Safety.

Highway Safety. No comprehensive traffic management plan has been submitted to show that significant on road queuing (particularly from non pre-ticketed attendees) would be avoided. We can see no evidence of a risk assessment of potential queuing traffic on Oving Road and we would like to be reassured that queuing traffic on Oving Road will not cause a road safety issue

given that road is subject to the national speed limit, and in places has limited forward visibility which seem likely to increase the risk of moving vehicles encountering stationary traffic at short notice.

It appears that the applicant's Sustainability Policy encourages pedestrian access to/from the site. However, given the site's relatively remote location, lack of public transport services, the absence of street lighting along Oving Road, the absence of pavements and the fact that the road is subject to the national speed limit, it appears inappropriate to encourage or facilitate pedestrian access to/from the site, noting that late night egress from it will be in the dark. An example of the issues that can arise from this were those relating to late night egress from the old Thursdays Nightclub at Drayton, including at the adjacent level crossing (there being a level crossing on Woodhorn Lane). A further issue is the off-site vulnerability of persons evicted from the site due to inappropriate behaviour should they refuse to comply with any event management procedures.

No plan for the avoidance of mud migrating onto the highway appears to have been submitted (also a potential breach of Highway related legislation).

No assessment has been submitted of the ground conditions in the area of ancient woodland, pond, watercourses and common land to the north and west of the open field known as Holly Tree Field so as to be able to assess the safety of those areas for attendee access or the measures necessary to make those areas safe. We note the presence of uneven ground, watercourses and a pond and historically dumped material in the common land area.

3. Public Nuisance.

It does not appear that an objective assessment has been made as to what sound levels would be generated by the range of events that could be enabled by this application and the effect on dwellings in the area.

The potential for pedestrians egressing from the site late at night causing nuisance to residents in the area (not only via Oving Road but also unauthorised egress northwards back to Tangmere).

Other points to note:

The "Forest School" activity area (as shown on the plan within the ESMP) falls outside of the Licensing application area. It has not been shown how access to this area would be prevented outside of these specific activity periods.

Further the Parish Council believes that there is a presumption against fencing off an area of common land and remains to be convinced that these events justify such fencing in order to prevent or control access.

No planning applications for hardening up or making safe for public access the proposed site accesses have apparently been submitted. Without these in place it would appear difficult to confirm the suitability and safety of these accesses for these events.

Tangmere Parish Council requests that, in the interests of appropriately assessing this application and the full scale and range of activity being sought, that consideration of this

application be deferred and then re-consulted on after the following have been provided (and any others that may arise from the comments above):

1. That a comprehensive ecological survey of the area of ancient woodland, pond, watercourses and common land to the north and west of the open field known as Holly Tree Field is conducted to provide information on those areas habitats and wildlife so as to enable assessments to be made as to the likely impact of Licensable Activities (including associated lighting and noise sources) and presence of attendees/staff on those habitats/wildlife in order to prevent breaches of any provisions within Wildlife and Countryside Acts and any other statutory natural environmental legislation.
2. That a survey of ground conditions within the area of ancient woodland, pond, watercourses and common land to the north and west of the open field known as Holly Tree Field is provided to assess the safety of those areas for human access.
3. That a comprehensive traffic management plan is submitted for all potential events being sought by this application so as to enable assessments to be made as to this site's capability to manage safely peak flows in/out of the site given the nature of and traffic speeds on Oving Road adjacent to this site. Particular assessment of how queuing on Oving Road by non pre-ticketed attendees would be managed, as well as measures to prevent mud migrating onto the public highway in adverse weather/ground conditions. An additional assessment would be needed to confirm the site's parking capacity given the variable ground conditions and gradients.
4. That a comprehensive "evicted persons" management plan is submitted to assess whether those expelled out of the site can be adequately protected from harm given the relatively remote nature of the site and that appropriate means of transport can be provided to take expelled persons to a safe place. Note the limited availability of taxis and private hire vehicles for rural pickups.
5. That an objective assessment is made of what sound levels would be generated by the range of events that could be enabled by this application and the effect on residents in dwellings in the area around the site.

Should the licensing authority be minded to permit this application, then Tangmere Parish Council respectfully suggests the following outline conditions, in addition to making conditions relating to those surveys and plans outlined above:

1. That the area of ancient woodland, pond, watercourses and common land to the north and west of the open field known as Holly Tree Field be excluded from the application boundary and related activities and those areas are appropriately fenced off to prevent human ingress/egress from the open field area and unauthorised access from the north;
2. That only the one 2500 attendee event, as described in the submitted ESMP, is permitted so as to enable the assessment of the adequacy of management plans and the environmental impact of that scale of event.

3. That events do not take place during wildlife breeding seasons or other vulnerable times for wildlife.

Yours sincerely

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