



REPRESENTATIONS PROCEDURE NOTES

- A representation can be made against an application for a premise to carry on a licensable activity within the 28 day consultation period. Representations can also be made on premises that are making variations to an existing licence.
- Representations are made by:
 - Responsible authorities
 - Other persons
- Fill in the appropriate form and send to Licensing Team, Public Protection, Shirehall, Abbey Foregate, Shrewsbury SY2 6ND

PLEASE NOTE: The representation form must be received by the Licensing Team before the end of the consultation period or it will not be accepted.



LICENSING ACT
2003
REPRESENTATION
FORM

Other Persons

Name/Company Name/Name of Body you represent	Simon Burke
Postal & email address	[REDACTED] [REDACTED]
Telephone number	[REDACTED]

Licence application being objected to: 23/03530/LPREM (revised from 15 to 8 events)

Name & Address of premises for which the representation is being made

[REDACTED]

Your representation must relate to one of the following four Licensing Objectives. Please detail the evidence supporting your representation or the reason for your representation. Please use separate sheets if necessary.

THE PREVENTION OF HARM TO CHILDREN

No objections on these grounds

TO PREVENT PUBLIC NUISANCE

The application is still for an additional 8 days of events. It is noted that the local authority has indicated it will approve the application if:

- the maximum number of events held per annum to be no more than 8 days;
- events held on Monday – Friday shall last no more than 6 hours;
- events held Saturday and Sunday shall last no more than 8 hours;
- all Regulated Entertainment to cease by 22:30;
- events shall not be held on more than 4 days consecutively.

This does not adequately take into consideration the specific characteristics of the town centre of Ludlow which is compact and multi-functional. There are many private residences within a short distance of the venue and the streets are narrow with poor access. Residents would be disproportionately negatively affected by these arrangements.

Key issues are:

- the number of additional days being permitted;
- the time by which events must cease;

- communication with residents.

The number of days (bearing in mind that these are *additional* to what is already approved under the licence) should be fewer than 8. The authority should be required to explain on what basis permission might be given for 8 days of activity and how the specific characteristics of the town have been taken into consideration. The applicants have clearly adopted a strategy of initially proposing a very large and most unreasonable number of (days for) events that they must have expected would be rejected. It is unclear why an additional 8 days is regarded as reasonable simply by being fewer than 15.

There will be considerable additional nuisance generated by the noise and large numbers of people attracted to the event. They will be present late into the evening (since the events are not required to cease until 22.30 meaning people will be circulating long after this time). This will take place over an extended period during which it will not be possible to avoid the noise. The finishing time for the events means that there could be loud noise until late into the evening which cannot be avoided even by remaining indoors. (Note that the local view is that the music can be enjoyed from Whitcliffe Common, considerably more distant from the venue than Bell Lane).

There is only a very approximate indication of the number of people likely to attend these events. There is also no mention of these numbers in the new terms (as stipulated by the Responsible Authority for the Licensing Objective the Prevention of Public Nuisance). In particular there is no indication of how the numbers to be allowed under the revised licence relate to the number attending last year or the limits placed upon them. Consequently these appears to have been no consideration of the impact the numbers of people had, not just on the income of local business (of which the owners of Ludlow Castle are one despite their disingenuous publicity material referring only to others), but of residents.

Communication with local residents has been poor. I have lived at the above address since January 2019 and at no time during the intervening period have my views been sought either by the owners of Ludlow Castle or the event organisers, Futuresound Events Limited.

TO PREVENT CRIME & DISORDER

No objections on these grounds, though it would be reassuring to learn that there would be a police presence during these events to monitor activities beyond the licensed premises. It is not adequate to rely on security guards and stewards employed by the event organisers.

PUBLIC SAFETY

There is no mention in the application nor in the opinion from Shropshire County Council of the impact of the arrangements for vehicular traffic during the additional or already approved days of events. There are two aspects to this.

- i) Whether traffic continues to be allowed access to the town centre and associated parking arrangements via King Street.
- ii) When the town centre is closed to traffic, the temporary conversion of Bell Lane to two way traffic flows.

The additional traffic flows appear not to have been fully considered. They serve to emphasize the unsuitability of central Ludlow for events of this nature. From a personal point of view I am very concerned about the arrangements for Bell Lane. The temporary allowance of two way traffic operation along Bell Lane when Castle Square is closed appears to have been a policy for a number of years. While appreciating it is intended to assist access for residents it cannot be restricted to such. The arrangements are inherently dangerous but perhaps justifiable in the past

on the grounds of their infrequent application. However, the road is very narrow and as the number of events necessitating the temporary operation increases, increasing the aggregate traffic flow over time, the chance of an accident during one period of town centre closure or another, increases. The front door of my house is less than 1.5m from the edge of the road which is only wide enough for single vehicles. I am seriously concerned that an accident may occur that will endanger both my safety and that of my property. This is especially the case when visitors to the town, in an attempt to access the town centre from Broad Street encounter road closures and choose to use Bell Lane as their alternative route. Such people are not used to the circumstances and may add significantly to the danger posed. There is typically no monitoring of the arrangements giving rise to further concern.

Suggested conditions that could be added to the licence to remedy your representation or other suggestions you would like the Licensing Sub Committee to take into account. Please use separate sheets where necessary - refer to checklist.

TO PREVENT PUBLIC NUISANCE

1. That the level of noise allowed for the outdoor musical events be reduced. The distance from the event location at which these are measured should be increased. (The address for which representation is made is approximately 275m from the event location). Residences in Dinham are not the only ones affected.
2. The applicants should be required to indicate more precisely how many people will attend the events and how this compares to previous events at the venue.
3. That the number of days for additional events be further reduced.
4. That the finishing time of events be made earlier than 22.30.

PUBLIC SAFETY

5. Further events envisaged should not be allowed to take place unless traffic management is put in place that is safe for residents of in Bell Lane. The safety of pedestrian users of the town centre should also be properly safeguarded. Any such arrangements should be effectively monitored and enforced and residents be kept fully informed. (Please note that recently I have not received personal notification of temporary changes to the traffic arrangements in Bell Lane).
6. Policing arrangements should be clarified.

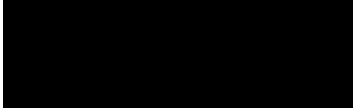
OTHER MATTERS (mainly of politeness and consideration)

7. That notice be given well in advance of any events due to take place of:
 - i) when they will take place (as it will be necessary to explore the possibilities for avoiding disturbance;
 - ii) that detailed notice is given of when the noise can be expected to be especially loud and at what time of day.
8. There should be regular consultation with affected residents during the events to include those beyond Dinham.
9. That the licencees be required to consult with local residents in a meaningful fashion before any further licence or extensions of the current licence are applied for.
10. That the owners of Ludlow Castle refrain from posting notices that ignore residents' welfare, make unsubstantiated claims for the events, and fail to mention the benefits to both the site owners and the event organisers. (See appendix giving photograph of such a notice).

Generally if there is to be a hearing to determine the premises licence application, the sub-committee will only be able to consider matters that have been previously disclosed. No new evidence can be introduced at the hearing. It is therefore imperative that you detail all matters that you wish to be considered on this initial representation. Please attach additional sheets if necessary.

If you do make a representation you will be expected to attend the Licensing Sub Committee and any subsequent appeal process. All representations in their entirety, including your name and address, will be disclosed to the applicant for the premises licence and any other interested parties. If all parties agree, the application can be dealt with without holding a hearing.

Signed:



Date: December 15th 2023

Please return this form along with any additional sheets to the address below:

Licensing Team
Shropshire Council
Shirehall
Abbey Foregate
Shrewsbury
SY2 6ND

This form must be returned within the statutory period, which is generally 28 days from the date the notice was displayed on the premises or the date specified in the newspaper advert.

For confirmation on this date please contact the Licensing Team on 0345 678 9026

Appendix: Notice Posted by the Owners of Ludlow Castle on One of the Paths Around the Castle

(photograph taken 14/12/23)



This license application made by the Futuresound Group in order to increase the number of attendees at the Live at Ludlow Castle music series taking place each summer has the full support of the Powis Estate, owners of Ludlow Castle. This will help support local charities, economic growth, sustain and maintain the Castle and cement the town as a destination for world class artists for years to come.

The new licence will run alongside the castles existing premises licence and the castle will retain control over the number of shows taking place within the grounds each year.

**Gemma England
General Manager
24.11.23**