

# Fit for Purpose and Fit for the Future

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## Introduction

A new premises licence is to be applied for Glastonbury Festival of Contemporary Performing Arts. This is for a 10 year term to include licensable activities on land centred on and surrounding Worthy Farm, Pilton, within the area of the Mendip District, where the event has been held for more than forty years. There are, however, likely to be fallow years within this period.

The proposed area for licensable activities will take place within the specific lines of the plan that accompanies the main application.

Each annual event is proposed as a festival of performing arts with the public being admitted through the gates between Wednesday and Monday in June, July or August each year.

The Event is an outdoor event with multiple venues, including main outdoor stages, indoor tented stages and some smaller micro venues/sideshow provided in covered marquee venues. There will also be food traders, market stalls and bars.

Glastonbury Festival needs to be able to evolve whilst working in harmony with the relevant authorities for each Festival, and this licensing process aims to strengthen the existing planning process that essentially provides the basis on which to successfully manage the event. There are increasing demands on the Festival by both the customers and the authorities either by requirements of statute or by continually improving the standard of management, facilities and entertainment year on year. There are many examples of increasing demands on existing staff, where they are having to work longer hours, and the need for extra numbers of staff to promote the licensing objectives and comply with new legislation. More Security, stewarding and other voluntary staff are needed to aid crowd safety, crowd control, crowd management, campsite management and traffic management. Providing the additional facilities to improve standards, such as toilets and water, always means additional staffing is required to install service and manage them. New or improved production features have to be provided each year to ensure that Glastonbury Festival remains fresh which is a main reason why the Festival is still a sell out unlike other competitors. The Glastonbury Festival of 2002 was very different to the Glastonbury Festival of today and therefore this growth needs to be reflected in this proposed new licence where the aim is to address these demands to provide a licence that is 'fit for purpose and fit for the future'.

## Main Changes to the Licence

There are three main reasons to change the current licence:

- To provide additional passes for staff/complimentary/performer passes
- To provide low level entertainment on Wednesday
- To make the licence clearer, more flexible and less burdensome for all stakeholders

### **Additional Passes for Staff/Complimentary/Performer Passes**

There is no change to tickets that go on sale to the public i.e. 135,000 weekend tickets and 5,000 Sunday tickets as these will remain the same. This only proposed change is to staff and artist passes to cope with the growing demand for staff and artists that work and perform at the Festival.

A breakdown of the staff/complimentary/performer pass allocation will be provided in the EMP each year along with information of how they will be accommodated onsite or offsite and within the traffic management plan and the campsite management plan.

The proposed new attendance is to increase the staff/complimentary/performer passes to 63,000.

### **Low Level Entertainment on Wednesday Evening**

Operating times have been structured and entertainment programmed to provide a "soft start" and a "soft finish" to each annual event to assist traffic and crowd management so that arrival and departure is spread over a period of time.

It has to be recognised that the vast majority of the public arrive on the Wednesday where historically the main arrival day was on the Thursday.

It would allow for better crime prevention and improved crowd management if the low level entertainment that is currently provided on Thursday evening was allowed to be brought forward to include Wednesday evening.

### **Making the Licence Clearer, More Flexible and Less Burdensome for All Stakeholders**

The current licence is not only over-burdensome for Glastonbury Festival but also for the authorities. There is no flexibility written into the licence to allow for identified improvements and necessary changes to be made without doubt and confusion arising.

There is now a deeper understanding across the country that licences for outdoor festivals are in place so that there is flexibility for the site design to be evolved in order to make year on year improvements. This is the type of fit for purpose licence that Glastonbury Festival requires in order to maintain its status of being the UK's largest and most successful Festival.

Each year Glastonbury Festival consults with the authorities on any improvements or changes to be made but the current licence is worded in such a way that it casts doubt in all stakeholders minds on the ability to make any change without going through the full licensing process again and subsequently causes confusion. This licence seeks to remove any confusion so that any change can be discussed with the authorities in the annual planning process, allowing for the most appropriate course of action to take place.



The Licensing Act and the regulations made under the Act were not written with large open air events in mind and offer little practical guidance. The legislation was produced for fixed, permanent premises that are licensed in perpetuity and asks for certain information to be provided on a plan that is submitted with a licence application. Whilst a pub, club or theatre confined within a permanent building could easily provide this one-off information it is not fit for purpose to follow this method for an annual outdoor festival and therefore the substitution of an annual planning process involving a very detailed EMP provides a much more comprehensive method of promoting the licensing objectives. For example:

- A plan to the scale of 1:100 cannot be created for the site as the size would cover approximately ten acres
- Apart from the permanent farm buildings there are no walls and the fence line may have to change dependent on land boundaries
- Positioning of bars, late night refreshment outlets and entertainment areas has to remain dynamic within the core of the site to allow for poor ground conditions, improvements/changes in infrastructure and to keep the Festival fresh for attendees. The main stages, as agreed with MDC representatives, will be shown on the licence application plan and therefore these will not change location each year.

Unlike any other type of licensed premises a detailed Site Plan is provided every year that includes every aspect of the design and layout of the site as part of the EMP and the full planning process developed in conjunction with all of the relevant authorities to provide a complete scrutiny and audit for each event.

The Licensed Plan that has been submitted as part of the application that will contain all of the licensable activities within the different coloured lines to indicate each different licensable activity such as:

- Blue Line for Regulated Entertainment
- Green Line for Late Night Refreshment
- Red Line for the Sale and Supply of Alcohol

These boundaries of licensable activities will not change under the term of the proposed new licence without going through a variation process.

This provides the flexibility to adapt venues to meet the need to freshen up the event. A full assessment is carried out by experts who form part of the Festival Management Team if and when any such adaptation needs to occur.

All of these processes fit in with the new EMP sign-off procedure introduced by the Licensing Authority in 2013.

Therefore, the measures to be implemented to make the licence clearer, more flexible and less burdensome include the following provisions:

### **Event Management Plan and Scrutiny**

The planning process for Glastonbury Festival is key to the success of the event and is an exemplar for successful partnership working and how large major outdoor events should be planned, managed and run. The production, development and scrutiny of the Event Management Plan (EMP) as part of this planning process enables the input of each of the various agencies. The planning process and the production of the EMP will not change. The new licence seeks to strengthen the ties to the EMP and make the process more transparent as well as providing the opportunity to streamline the process so that the key, salient information is provided to suit all agencies.

Each year an EMP is produced to cover all aspects of promoting the licensing objectives. The first draft of the EMP will be provided at least 180 days prior to each annual event. It is proposed that each year at the first meeting of the multi-agency group, a schedule of key dates is produced to provide milestone submission deadlines for each document under each section of the EMP. This will then be developed to the satisfaction of the relevant agencies in the lead up to each annual event. A final version of the EMP will be provided to the licensing authority and responsible authorities at least 30 days prior to the start of each annual event to go through a formal scrutiny process with the various agencies.

Each EMP will be a flexible document that changes as the planning of each annual event develops and therefore does not form part of the formal application.

The EMP will provide the Event Management Team with a clear plan and policy of how each annual event will be run and to provide the Authorities with the information they require in order to have an understanding of the structure and running of each annual event in line with the granting of the proposed licence.

The contents of the EMP will be as per those listed on the following pages but the list is not exhaustive and will be developed as and when necessary to fit in with the requirements of each Festival and allow for any change in the working practices and the requirements of each relevant agency.

### **Late Night Refreshment**

Following discussions with the Principal Licensing Officer and the Licensing Enforcement Officer, the commissioning of late night refreshment for staff prior to the event being open to the public has been brought into this licence in order to remove any uncertainty as to whether this is a licensable activity or not. Because it is a large operation to get them set up and positioned, traders generally arrive on the Sunday prior to the public admittance on the Wednesday. During the period before the public arrive onsite the traders provide a service by selling food to staff onsite. It is accepted that there is some ambiguity from the Council. Therefore, to normalise this activity and make it more transparent it will now be included in this proposed new licence.



### **Temporary Event Notices (TENs)**

There are a number of TENs that Area Organisers submit to the Licensing Authority and the Police in the weeks leading up to the Festival in order to allow them to sell or supply alcohol to their staff generally from within their backstage compounds and prior to, or immediately following the event. Dealing with these TENs is an unnecessary burden for the authorities when preparations for the main event are in full swing and 'policing' them during the event is difficult because of the size of the site and each TEN being different. Therefore, the sale and supply of alcohol that would normally be covered by a TEN is now to be included in the proposed new main licence. This removes any uncertainty and will bring this activity under the control of the DPS and therefore the GFL Alcohol Management Team.

### **Designated Premises Supervisor (DPS)**

This will be Robert Richards who is the Commercial Director of the Festival and a member of the Senior Management Team. He will have overall control of the supply of alcohol, alcohol policy and alcohol management at the event. He will be ably supported by suitably experienced staff.

## **Proposed Contents/Structure of the Event Management Plan**

- 1) Alcohol Management Plan
  - a. Bar Management Structure
  - b. Summary of bar operators on site
  - c. Bar Operating Procedure
    - i) DPS briefing note & letter to bar managers
    - ii) DPS checklist
    - iii) Times of operation
    - iv) Weights and measures
  - d. Protection of children from harm
    - i) Challenge 21 scheme
    - ii) Register of refusals
  - e. Control of illegal sales
  - f. Devon and Somerset Trading Standards Service Advice
- 2) Campsite Management Plan
  - a. Campsite densities
  - b. Camping facilities
  - c. Campsite management
  - d. Campsite safety and security
- 3) Command, Control, Communications and Coordination Plan
  - a. Command Structure
  - b. Operating Hours
  - c. GFL Event Control
    - i) Structure
    - ii) Operation
      - Steady state
      - Incident
      - Emergency/major incident - MIP
  - d. Communications Plan
  - e. Communications Infrastructure

- 4) Crime Prevention/Reduction Plan
  - a. Crime Prevention/Reduction Initiatives
  - b. Joint Patrols and Operations
  - c. CCTV and Policies
  - d. Confiscation Policy
  - e. Drugs Policy
  - f. Eviction Policy
  - g. Crime Prevention Advice
  
- 5) Crowd Management Plan
  - a. Risk Assessment of changes from previous event
  - b. Measures applied to control and manage crowds
    - i) During Site Ingress
    - ii) During Site Egress
    - iii) During movements around site
  
- 6) Fire Safety Plan
  - a. Fire Safety Arrangements
    - i) Fire precautions
    - ii) fire points,
    - iii) fire fighting staff and equipment
    - iv) means of escape from venues
  - b. Fire safety stewarding
  - c. Fire shows, fireworks and pyrotechnics
  
- 7) Major Incident Plan
  - a. Roles & Responsibilities
  - b. Definitions
  - c. Command and Control
  - d. Threats & risks
  - e. Responses, Procedures and Contingencies
  
- 8) Medical and Welfare Plan
  - a. Medical and Welfare Working Group
  - b. Primary Areas of Responsibility
  - c. Medical Facilities
  - d. Welfare Facilities
  - e. Lost Child Procedure
  
- 9) Noise Management Plan
  - a. Acoustic Consultant Details
  - b. Sound System Schedules
  - c. Procedures for Managing Sound/Noise
  
- 10) Sanitary Facilities Plan
  - a. Number and Types of Toilet Facilities
  - b. Sinks and Other Washing Facilities
  - c. Servicing Arrangements

11) Security and Stewarding Operational Plan

- a. Security and Stewarding Coordinator Details
- b. Security Fence Details
- c. Security and Stewarding Schedules
- d. Offsite Security and Stewarding Provisions
- e. Steward Training Programme
- f. Steward Statement of Intent

12) Site Plan

- a. The site boundaries and entrances and exits to the site (including those for emergency services) which shall be clearly labelled
- b. The location of any licensable activities
- c. The location of the main perimeter fence line
- d. The location of other fence lines and barriers
- e. The location of all road and track ways (including emergency routes), car parks and other vehicles compounds;
- f. The location of all structures either permanent or temporary demountable that are brought onto site
- g. The location of the campsites
- h. The location of toilet, shower and washing facilities
- i. The location of drinking water points and associated pipework including sampling points and soakaways
- j. The location of all lighting facilities including those for the event arena, associated walkways and vehicles routes and emergency routes
- k. The location of welfare tent and medical services
- l. The location of generators and other principal electrical connections
- m. The location of fuel stores
- n. The location of any fairground rides
- o. The location of fire fighting equipment and other associated fire fighting provision

13) Ticket and Entry Policy

- a. Public Tickets
  - i) Terms and Conditions of Entry
  - ii) Methods to Prevent Ticket Touting
  - iii) Entry System
- b. Staff/Complimentary/Performer Passes (including numbers breakdown)
- c. Sunday Tickets

14) Trader Information and Management

- a. Terms and Conditions of Trading
- b. Information Pack for Traders
- c. Food Traders checklists
- d. Managing Food and Drink Outlets
  - i) Applicable guidance and legislation
- e. Details of Food and Drink Outlets
  - i) Market layout maps
  - ii) List of all traders



15) Traffic Management Plan

- a. Parking provisions
- b. Road signage and offsite infrastructure
- c. Internal signage to car parks and campsites
- d. Road cleaning
- e. Bus and coach station provision
- f. Rail and ride provision
- g. Road closures
- h. Contingency plans for ground surfaces
- i. Separation of vehicles and pedestrians
- j. Provision and management of a public drop off and collection point
- k. Applying to the relevant authorities for all TROs and road closures including information on public notices
- l. Contractors, traders and access routes during the build
- m. Access routes for service vehicles during the event period

16) Venues Information –

- a. Operating Hours
- b. Temporary Demountable Structures Information
- c. Venue Risk Assessments
- d. Artist Profiles

17) Waste Management Plan

- a. Arrangements for the Collection, Storage and Disposal of Dry Waste/Litter
- b. Arrangements for the Collection, Storage and Disposal of Foul and Grey Water
- c. Arrangements for the Collection, Storage and Disposal of Clinical Waste

18) Water Supply Plan

- a. Measures in Place to Ensure an Adequate Supply
- b. Measures to Ensure a Wholesome Supply
- c. Risk Assessment
- d. Contingency Plan for Emergency Water Provision

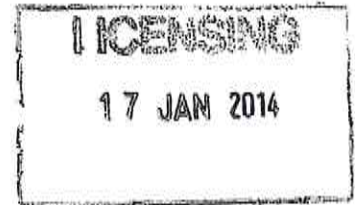
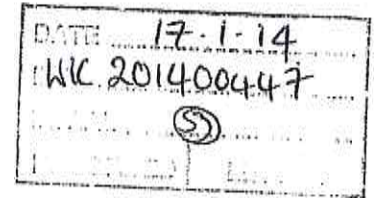
## **Information required by Other Legislation**

There are requirements in other legislation that is not duplicated in the licence. This legislation includes:

- Health and Safety at Work etc Act 1974
- Food Safety Act 1990
- European Communities Act 1972
- Water Supply (Water Fittings) Regulations 1999
- Private Water Supplies Regulations 2009
- Regulatory Reform (Fire Safety) Order 2005
- Waste (England and Wales) Regulations 2011
- Health Act 2006

Information required by this and any other legislation will be provided separately.





Mr Jason Kirkwood  
Mendip District Council, Licensing  
Cannards Grave Road  
Shepton Mallet  
Somerset  
BA4 5BT

REF: LIC/PL/MAP/20140116  
16 January 2014

Dear Jason,

**Re: Premises Licence Application for Glastonbury Festival of Contemporary Performing Arts 2014 to 2024**

As agreed by all in our previous meeting in December 2013, the Licensing Act 2003, and indeed The Licensing Act 2003 (Premises licences and club premises certificates), Regulations 2005 were not scripted to deal with multi-venue events particularly the size and nature of Glastonbury Festival. We however understand the Licensing Authority is not able to offer what they would and would not reasonably expect a licensed plan (the Plan) to show.

The licensing objectives are clearly promoted by the stipulations within the operating conditions, which include the production of an annual Event Management Plan (EMP) including a full detailed site plan. The licensing objectives are not promoted by the submission of a licence plan. The Regulations do not even mention promotion of the licensing objectives throughout the whole statute.

GFL therefore believe the principles of Regulation 23 of The Licensing Act 2003 (Premises licences and club premises certificates) Regulations 2005 are achieved by showing the following on the Plan and demonstrate that the interpretation they adopt has no negative impact on any of the licensing objectives and that there are alternative assurances in place to promote and support the licensing objectives equally effectively.

With regard to the specifics of Regulation 23;

- (1) A Plan has been submitted with the Application
- (2) An A0 size Plan has been provided.
- (3) The Plan shows -
  - a) The extent of boundary of the perimeter of the land to be used for licensable activities;

- b) The location of points of access to and egress from the land bounded by the perimeter which is also supported by the permanent farm tracks shown within the site;
- c) The emergency routes are considered to be part of the above access to and egress routes from the site. The emergency routes will also be scrutinised by the blue light services prior to each Festival and in accordance with licence condition A6(7);
- d) The area of the land to be used for each licensable activity is provided by the various coloured lines on the plan with regulated entertainment to be within the blue line, alcohol sales within the red line and late night refreshment within the green line. GFL has gone further to include a line to show the area within where late night regulated entertainment will be restricted. Late night regulated entertainment is also defined in the Glossary as part of the Operating Conditions;
- e) The Regulations refers to fixed structures or similar objects temporarily in fixed locations that may impact on the ability of individuals within the perimeter to use exits or escape routes. In this regard, no fixed structures or similar objects will be placed in locations that have an impact on the use of exits routes or escape routes from the site. The main access/egress routes and stone track routes are therefore identified on the Plan;
- f) Location of main stages, identified as 1 – 15; the height and area of each stage relative to the floor is not identified as they are placed on undulating ground on a green field site which will vary from one end of the platform to the other. We believe this will not have a negative effect on the licensing objectives by not providing this detail within the Plan. This flexibility is also required as stages/venues may have to be hired/purchased from alternative suppliers, for example suppliers no longer trading. This detailed information however will be available for scrutiny through the EMP prior to each event. Other venues are not identified on the Plan as GFL require some flexibility to meet the changing demands of consumers, changing popularity of venues and to react and make year on year improvements. However, late night regulated entertainment will be zoned and identified on the Plan to ensure the prevention of public nuisance licensing objective is promoted within the bounds of the current arrangements;
- g) The location of temporary steps/stairs on the premises to be used by the general public are provided. Steps are provided to the main stages as identified in f) above, but showing these steps to and from stages is considered impracticable and they will not be used by the general public and their configuration may alter due to land stability/stage configuration etc. It is not deemed that alterations to stairs and steps will have any negative impact on the licensing objectives. In addition stage/venue details will be available for scrutiny through the EMP prior to each event;
- h) There are no rooms containing public conveniences available to the public. However, those fixed toilet locations that are open to use by the public are indicated on the Plan. Approximate locations of portable toilets are also indicated. More specific locations of portable public conveniences will be provided in each annual site plan and in accordance with licence conditions A6(10), A6(12) and PS11;



- i) The location and type of any fire safety equipment and any other safety equipment are not provided on the Plan. This is due to the scale and the need to have flexible venues, offices, and public areas. The required level of detail will be provided and available for scrutiny through the EMP prior to each event in accordance with licence condition A6(6);
- j) The location of all the catering facilities (kitchens) are not included as there are over 400 and therefore too many to detail on the Plan and are subject to change annually. However, detailed plans of the location of catering facilities are to be provided each year in accordance with licence condition PS7 and will be available for scrutiny through the EMP prior to each annual event and as a continuum from the current licence.

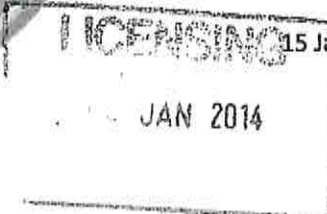
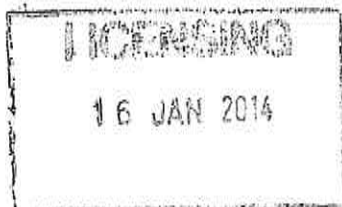
I trust that the above is a satisfactory explanation of the Licence Plan submitted with the GFL Premises Licence Application submitted on 16 January 2014.

Yours sincerely,



Operations Director, Glastonbury Festivals 2014 Ltd

CC     Stuart Cave  
       Nigel Hunt



Mr Jason Kirkwood  
Mendip District Council, Licensing  
Cannards Grave Road  
Shepton Mallet  
Somerset  
BA4 5BT

Receipt. 50930

Dear Mr Kirkwood,  
**Premises Licence Application for Glastonbury Festival of Contemporary Performing Arts 2014 to 2024**

With regard to the above application, please find enclosed the following documents:

- Application Form
- Licence Plan
- Operating Conditions
- Letter from [REDACTED] (solicitor)

Also enclosed is the following supporting documentation:

- Fit For Purpose, Fit For the Future.
- Event Management Plan for Glastonbury Festival 2014 (on disk) featuring updated:
  - Site Plan (B11)
  - Noise Management Plan (B10)
  - Campsite Management Plan (F1), Map (F2) and calculations (F3)
  - Traffic Management Plan (E1)
  - Security Plan (C3) and overview of Security Schedule (C5, C1)
  - Alcohol Management Plan (new)

Please do not hesitate to contact [REDACTED] on 07513 [REDACTED] [eventeasy@hotmail.co.uk](mailto:eventeasy@hotmail.co.uk) or [REDACTED] on 01749 [REDACTED] / [REDACTED] [@glastonburyfestivals.co.uk](mailto:@glastonburyfestivals.co.uk) if you need to discuss any aspect of the application, have any queries or require further information. The address for correspondence with regard to this licence application is Licensing Office, Worthy Farm, Pilton, BA4 4BY.

Yours sincerely



Robert Richards  
Commercial Director, Glastonbury Festival



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Our ref 303L/MP01/085749/000004  
Your ref Glastonbury Festival

To whom it may concern

Direct tel +44 (0)117 917 8020  
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Date 16 January 2014  
Email [REDACTED]@TLTsolicitors.com

Dear Sirs

#### **Glastonbury Festival 2014 Limited**

We act for Glastonbury Festival 2014 Limited and write to introduce the principle that lies behind the submission of this new application.

The existing licence remains in situ and, if this application is granted on the terms and conditions requested, then the existing licence (premises licence number PRL0541) will be surrendered. This application does not seek to change the days that the public are permitted access to the site, though the hours of operation and the days of operation currently permitted do change. The application has two fundamental elements:

#### **Change of capacity**

There is proposed within this application an increase of some 25,500 persons permitted access to the festival site. The current licence permission is 177,500 and the new proposed capacity is 203,000.

The increase will accommodate artists and staff, not ticket purchasing members of the public.

The need for an increase in artist and staff numbers is driven predominantly to ensure a safe and secure festival. Over the course of the last several years the requirement on, as an example, litter collection, tent removal, stewarding and security of car parks, the stewarding and security of camping areas, has significantly increased. In simple and blunt terms the volume of staff, monitoring and ensuring the safe conduct of the event, as a proportion of the volume of attendees at the festival, has increased year on year. That means that in future without an increase now, the volume of tickets sold to member of the public will inevitably have to decrease.

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A list of members (all of whom are solicitors or lawyers) is available for inspection at that address.

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It is obviously through ticket sales that the income is generated that allows the event to be the artistic success that it is, and remains. It is, at least in part, the engagement of not just the biggest musical artists in the world, but also it is the breadth and depth of theatrical, circus, comedy (to name but three) artists and performers, that makes Glastonbury quite unlike any other worldwide event.

The Worthy View Camping area will now be embraced within the main festival site, not licensed under a TEN as previously.

However, and, candidly, without the event being a commercial success the licensing objectives would not be promoted to anything like the degree that they are here, as other festivals amply evidence. Nor would the festival have the ability to contribute not just by the cultural, vibrancy and diversity of England and Wales (let alone Mendip), but nor would it bring the economic benefits to the community at large. And that financial driver, albeit we entirely accept that this is unrelated to any specific licensing objective, is what underpins the significant contribution to charity that the event delivers year on year.

The wider benefits to the community that the festival delivers, (as your policy recognises) over and above any financial gain, is we believe an important feature of the considerations that licensing must embrace.

#### **Change of conditions**

The second significant change to the licence (but not to the operation of the event) is a streamlining of the conditions governing the operation of the event. The licence is no longer sufficiently flexible for an event of this significance for it to be considered fit for purpose.

It is not proposed that there will be any lessening of controls and supervision on the operators or the event, through this change. Indeed if anything it is proposed that the control measures will become much more transparent and readily enforceable through their conversion from licence conditions, into a full and comprehensive event management plan (EMP) covering each and all of the areas and issues that cover governance of the event itself.

It became apparent in the spring of this year, in the lead up to the 2013 event, that the licence conditions covered certain significant matters but failed to address themselves to others. Candidly it seemed to cover matters of little or no licensing merit, which were closely controlled by officers, ever mindful that the governance of the festival is closely observed by many. By way of example, it was, as we discussed, perfectly legitimate for the Arcadia event to move position within the festival site. A view that was corroborated, we understand, by your licensing barrister. But other matters, barely touching on the licensing objectives would appear to merit formal variation.

Therefore what is suggested is that rather than, say, 7 conditions governing a low level of detail around the campsites, better that we have 1 condition that confirms that the campsites are to be managed and supervised to an appropriate level. The detail of that policy (which must be signed off by the various officers) is to be contained within the EMP. All specific conditions may well find themselves in to EMP itself but it is, we would suggest, unnecessarily restrictive (for officers as much as for the premises licence holder) to have the level of detail about the campsite contained in the licence and the conditions.

Significantly there is no proposed lessening of oversight here. That oversight will be maintained through the sign off and approval of the EMP into which all officers have input. There are obviously additional areas outside of the licensable activities and objectives that form a





constant dialogue, with a significant volume of officers from the various authorities and the local constabulary. None of that will be affected by this new licence. We have been at pains to ensure that there has been a full and comprehensive dialogue with all of the officers (not just a strict interpretation of the responsible authorities) in the lead up to this application.

That is not to suggest that we would not welcome further dialogue and discussion. By its very nature the 28 day consultation period will permit just that, but it is important that we put the rationale for the application in context now.

I trust for the short term that is satisfactory and if you have any queries then please do not hesitate to give me a call.

Yours faithfully



TLT LLP

