



The Licensing Department
Somerset Council
Cannards Grave Road
Shepton Mallet
Somerset
BA4 5BT

18th May 2023

Our Ref: JER001/dc

By email: licensing.mendip@somerset.gov.uk

Dear Sir/Madam

Licensing Act 2003 - Application for new premises licence (0317814)

Application by Bath Rugby Limited in respect of Farleigh House, Farleigh Hungerford, Bath, BA2 7RW

We write in connection with the above new premises licence application by Bath Rugby Limited ('BRL') on behalf of our clients, Mr Jeremy Hill and Mrs Clare Hill, the owners and occupiers of a nearby residential property – Falconers at Church Farm Lane, Farleigh Hungerford, BA2 7RP - located some 300 metres to the immediate north of Farleigh House. Our clients strongly object to the new premises licence for the reasons set out in this representation and accompanying form.

1. Introduction and scope of objection

We firstly set out the physical context and background to the new premises licence application before focusing upon the four licensing objectives of crime prevention, public safety, public nuisance and child protection, with particular emphasis upon the prevention of public safety and nuisance. This highlights serious concerns about the hours of operation, traffic, noise emanating from the premises, lighting and other detrimental effects upon our clients' and other local residents amenities, quality of life and enjoyment of their homes in this otherwise quiet rural location.

2. Physical context and background

Farleigh House and Castle Court ('the premises') date from around 1800 and are Grade II listed buildings set in the Somerset countryside near to the small rural hamlet of Farleigh Hungerford. The premises are within the Bristol and Bath Green Belt, designated to check the unrestricted sprawl of urban development, particularly that of Bristol and Bath but also other towns and villages within or adjacent to the Green Belt and to safeguard the surrounding countryside against further encroachment.

The premises is currently occupied by Bath Rugby Limited as its headquarters with training facilities, which is a "*sui generis*" use or a use 'of its own kind', one that is unique and not possible to group with other similar uses in any Use Class. This follows a planning permission granted in July 2010 (Application No. 2010/1044), when Mendip District Council concluded that, subject to conditions (see below), the proposals '*would safeguard the amenities of neighbouring residents and adjoining land users.*'

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344
duncan@chadwicktownplanning.co.uk
www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

To achieve this, the Council imposed a number of conditions on the planning permission, which *inter alia* control the following activities at the premises, with our emphasis in bold:

2. The upgraded playing pitch hereby approved shall not be used for the purposes of rugby training outside the hours of 09:00 - 16:00 Monday to Friday (inclusive) and 09:00 - 11:00 on Saturdays. The upgraded playing pitch shall not be used for the purposes of rugby training on Sundays or Bank or other public holidays.

Reason: To **safeguard the living conditions for occupants of neighbouring properties**, having regard to the provisions of Policy Q12 of the Mendip District Local Plan 2002.

5. No external lighting shall be installed for the development hereby approved unless an express grant of planning permission has been first obtained from the Local Planning Authority.

Reason: External lighting would require further detailed consideration in the interests of the **character of the area and neighbours' living conditions**, having regard to the provisions of Policy Q12 of the Mendip District Local Plan 2002.

7. No works or deliveries required to implement the development hereby approved shall take place outside the hours of 08.00 - 18:00 on Monday to Friday (inclusive), 08:00 - 13:00 on Saturdays and at no time on Sundays, Bank Holidays or other Public Holidays unless specific written permission has been first obtained from the Local Planning Authority.

Reason: To **safeguard the living conditions for occupants of neighbouring properties during the implementation of this permission**, having regard to the provisions of Policy Q12 of the Mendip District Local Plan 2002.

9. No external plant or equipment audible at the nearest residential property shall be located, installed or mounted on the walls or roofs, or adjacent to any of the buildings, whether temporary or otherwise, unless detailed plans and a technical specification, including noise details, have first been submitted to and approved in writing by the Local Planning Authority. Once the details have been approved, the equipment shall be installed in accordance with the approved details and maintained in such a way as to ensure compliance with the submitted specification.

Reason: To **safeguard the living conditions for occupants of neighbouring properties**, having regard to the provisions of Policy Q12 of the Mendip District Local Plan 2002

We set these out in full because they highlight the sensitivity of the premises, the wider site and the living conditions of occupants of neighbouring properties, including Mr & Mrs Hill, to activities at the premises, including the existing rugby training facilities and corporate headquarters for BRL, which are therefore controlled by conditions that should, if necessary, be enforced by the Council.

The scope of this permission was extended modestly in October 2016 (App. No. 2016/1786/FUL) when Mendip District Council granted approval for the use of part of the ground and first floors of Farleigh House and the whole of Castle Court as a joint use as a corporate training facility (D1 Use Class), in addition to the permitted sui-generis use as a training and administrative facility for Bath Rugby Club.

It was again judged by the Council that this use would safeguard the amenities of neighbouring residents and adjoining land users, subject to compliance with planning conditions, which required compliance with a Travel Plan – see below - and the conditions included in the text box, overleaf:

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

4. The number of delegates associated with the D1 Use hereby approved, shall be limited to 50 persons on any one weekday and the approved use shall not be carried out on weekends or Bank Holidays.

Reason: in the interests of **neighbouring amenity** and highway safety.

5. No external plant or equipment audible at the nearest residential property shall be located, installed or mounted on the walls or roofs, or adjacent to any of the buildings, whether temporary or otherwise, unless detailed plans and a technical specification, including noise details, have first been submitted to and approved in writing by the Local Planning Authority. Once the details have been approved, the equipment shall be installed in accordance with the approved details and maintained in such a way as to ensure compliance with the submitted specification.

Reason: To **safeguard the living conditions for occupants of neighbouring properties**

The most recent planning history (App. No. 2019/0363/VRC) to vary condition 2 (hours of use) on planning consent 2010/1044 for the change of use to the 'sui generis' mixed use as headquarters and training facilities for Bath Rugby Club to allow use of the rugby training pitch outside the restricted hours was "finally disposed of" [i.e. not determined] by the Council in January 2022. This was after objections from the Council's Environmental Protection Officer ('EPO'), Ward Member and local residents to the noise impact of such use beyond the permitted daytime hours as background noise levels are lower on weekends, bank holidays and evenings. The noise assessment submitted by BRL was considered to be unreliable and inadequate by the Council's EPO and not updated leading to the application lying dormant until being "finally disposed of" by the Council. There was also serious concern about the likely requirement for floodlighting and, if so, the impact of this upon the amenities of local residents with light pollution and the possible need for noisy generators.

Whilst this application was not progressed it clearly demonstrates the underlying and consistent concern about the impact of the activities at the premises upon the living conditions of neighbouring properties and the vital need to control such activities (hours of operation, noise levels, lighting) and enforce controls to prevent a public nuisance in this otherwise very attractive, rural, tranquil and bucolic part of the Somerset countryside. This is especially the case at Farleigh Hungerford because there is a small valley between Farleigh House and neighbouring properties at Little Pomeroy, Falconers (Mr & Mrs Hill's property), The Little House, Orchard View and Hillside Farm and the land rises up so the nearby residential properties sit slightly above the Farleigh Estate. With the prevailing south westerly winds the conditions are perfect for noise to travel from the premises towards our clients' and other residents' homes, making them vulnerable to noise and disturbance arising from the use of the site.

3. Licence Application

We note that the new Premises Licence seeks the following:

Opening Hours

Sunday – Thursday - 05:00 to 23:30 Friday & Saturday – 05:00 to 01:30 the following morning

Access to the premises by rugby or core commercial/operations staff to be permitted 24 hours a day.

Hours for the provision for the sale of alcohol (on sales)

Sunday – Thursday - 10:00 to 23:00 Friday & Saturday – 10:00 to 01:00 the following morning

Hours for the provision for recorded music and live music

Friday & Saturday – 10:00 to 01:00 the following morning

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963

VAT Registration No. 371 4873 78



Chadwick Town Planning

Hours for the provision of late night refreshment

Friday & Saturday – 23:00 to 01:00 the following morning

From this we can immediately and initially conclude the following in support of our objection:

1. Firstly, it is clear from the licence application that these hours of use are well outside and bear little relationship to the authorised hours of operation for the rugby training pitch - 09:00 - 16:00 hours Monday to Friday (inclusive) and 09:00 - 11:00 hours on Saturdays with no use for the purposes of rugby training on Sundays or Bank or other public holidays, which was deemed by Mendip District Council – albeit for planning purposes – to be the limit necessary 'to safeguard the living conditions for occupants of neighbouring properties'.
2. Secondly, the proposed hours even go well beyond the hours of operation allowed by the Council for the implementation of the permission, which was limited to activities during the hours of 08.00 - 18:00 on Monday to Friday (inclusive), 08:00 - 13:00 on Saturdays and at no time on Sundays, Bank Holidays or other Public Holidays. Once again this was to safeguard the living conditions for occupants of neighbouring properties.
3. Thirdly, the new Licence application omits or fails to contain adequate information to enable the Licensing Department to fully and properly consider the matter. For example, the submitted Site Plan showing the "Licensable Area" excludes virtually all of the neighbouring residential properties. Marked on Figure 1 below are just some of the nearest homes in the immediate locality of the premises that would be affected by the new licencing hours, with many others off the map.



Figure 1 – Map of Nearest Neighbouring Residential Properties

4. Fourthly, there is no noise assessment accompanying the licence application which is necessary to enable the Licensing Department to reasonably, fairly and properly reach a rational judgement on the prevention of public nuisance from the premises including the proposed hours of operation and the amount of noise likely to emanate from the premises.

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

5. Fifthly, whilst we understand that planning and licensing matters are covered by separate legislation and considerations, this did not prevent Mendip District Council adding a planning note to the permission (App. No. 2016/1786/FUL) stating:

'The applicant is reminded that compliance with the conditions attached to this consent does not provide any guarantees that the requirements of either the Statutory Nuisance provisions of Part III of The Environmental Protection Act 1990 or the Licensing Act 2003 can be achieved and does not preclude the Council from taking action under those Acts.'

However, we note that Section 3.6.2 of the Somerset Council's Licensing Policy states [our emphasis in **bold**] that:

"Non-compliance with other statutory requirements may be taken into account in reaching a decision about whether or not to grant a licence but only if relevant representations are received. Applicants, licence holders and notice givers are therefore reminded, in particular, of the need to be correctly registered with the Licensing Authority's food safety function and ensure the appropriate form of planning permission is in place, as these are separate regulatory regimes which are not superseded or overridden by an authorisation under the Licensing Act 2003"

We can see nothing in the existing planning permissions that permit anything other than use for:

- Headquarters for Bath Rugby Limited
- Rugby training facilities for Bath Rugby Limited
- Corporate training facility for up to 50 delegates on any one weekday

Properties in a sui generis use do not benefit from the "permitted development" rights under the *Town & Country Planning (General Permitted Development) Order, 2015 (as amended)* to change to an alternative use. It is our opinion that a change of use from a sui generis use or to a sui generis use or where there is a change from one sui generis use to another sui generis use normally requires planning permission.

This is especially where a sui generis use – as in this case with a wedding venue or premises for milestone celebrations for up to 200 guests¹ – unconnected with rugby, Bath Rugby Limited's headquarters or corporate training - is materially different from the existing use, as set out above. In our opinion, such use is a material change of use requiring planning permission under section 55 of the *Town & Country Planning Act, 1990 (as amended)*, which has not been obtained. We therefore consider 'the appropriate form of permission is not in place' and conflicts with Somerset Council's Licensing Policy.

What amounts to a material change is usually obvious, but where the new or proposed use may appear to be the same or similar type of use it is often assumed that there is no issue. However, this overlooks the concept of 'intensification'. A comprehensive analysis of the law in this area was conducted by Ouseley J and, later, the Court of Appeal in *Hertfordshire CC v Secretary of State for Communities and Local Government [2012] EWHC 277 (Admin)* and *[2012] EWCA Civ 1473* respectively, from which the following essential principles are clear:

- The intensification of a use can in principle amount to a material change
- This is the case even where the use remains of the same generic type
- It will require an increase in the scale of activities on site, as in this case
- It will also require a definable change in the character of the use made of the land
- Off-site impacts (such as traffic or noise) and their effect on other premises may be considered when determining whether a material change has taken place.

Applying these principles, with the current planning permission limited to 50 delegates attending corporate training events only on weekdays and rugby training on limited daytime

¹ <https://www.farleigh.house/wedding-venue-bath>

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

hours during the week and on Saturday mornings, the use by up to 200 guests for weddings and functions every day plus staff and suppliers, including weekends and Bank Holidays, late into the evening and early morning is a materially different use, on a much larger (400%) and more intensive scale, with a definable change in the character of the use [unrelated to the principal, rugby-related use] and having significantly greater off-site impacts, strongly indicates to us, our clients and many other local residents that a material change of use has occurred without planning permission.

We know that this is separate to the licence application but do consider that it is reasonable for the Licensing Department and its Committees to take this into account, as set out in the Council's Licensing Policy as the 'appropriate form of permission' is not in place.

4. Prevention of Crime and Disorder

We note the steps that BRL propose to put in place and that it will be primarily a matter for Avon & Somerset Police to advise on the crime and disorder elements to the new license application. However, the Crime and Disorder Act 1998 ('CDA') has established that the responsibility of reducing crime does not fall solely to the Police. Section 17 of the CDA requires local authorities to consider the crime and disorder implications of all their activities and functions and do all that they reasonably can to reduce these problems.

In terms of any crime, disorder or anti-social behaviour at the premises or related to the management of the premises, this will be down to the management of BRL to control, limit and handle. However, without prejudice to this objection, we consider that disorder or anti-social behaviour would be less likely to occur if the sale of alcohol was restricted to no later than 2300 hours on the premises, with no person allowed to leave the premises whilst in the possession of any drinking vessel or open glass bottle, whether empty or containing any beverage.

5. Public safety

We note that this normally relates to the safety of the public on the premises, i.e. fire safety, electrical circuitry, lighting, building safety or capacity, and first aid and will, again, be largely down to the management of BRL to manage, control, limit and handle.

However, it is not unreasonable for the Council, as local highway authority, to take into account the safety of the wider public in the vicinity of the licensable area/premises. In this rural, countryside location, there would undoubtedly be significantly increased traffic arriving and leaving in 'surges' and much of it unfamiliar with the area, using a part of the local highway network that is narrow, single carriageway, with blind bends, no footways or provision for non-motorised transport modes, walking and cycling. See Figure 2.



Figure 2 – Photographs of some of the lanes serving the premises

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ

+44 (0)7415 867344
duncan@chadwicktownplanning.co.uk
www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

There can be little dispute that the lanes serving the premises, being narrow single track for the most part and poorly maintained with no footways or lighting and limited forward visibility for much of their length, are entirely unsuited to the arrival in a short space of time of numerous vehicles, be they private cars, taxis or, even worse, mini-buses and coaches. There have already been a number of safety issues experienced by local residents caused by:

- The number of vehicles visiting Farleigh House, especially at peak arrival times
- Vehicles visiting Farleigh House other than via the recommended one way system, specifically those approaching via Church Farm Lane, in particular delivery vehicles
- The confusion arising from satnav systems directing visitors via narrow lanes rather than the Tellisford Road, which itself is narrow and unsuitable for large volumes of traffic
- Excess speed and poor driver behaviour along neighbouring lanes
- The area in front of East Lodge becoming a car/ taxi dropping off and pick up area within a matter of feet from East Lodge

Tellisford Road, from the A366 past the church and to Tellisford village, is part of the Macmillan Way walking path and is on the Wiltshire cycle route from Bradford-on-Avon to Mere. The road is well used by walkers and horses. There are 15 young children who live on the route to the premises along Tellisford Road from the A366 down to East Lodge and along past Hermitage House and up past Hillside Farm. All these houses are right on the road's edge. There is an existing Travel Plan associated with the corporate training activities but we understand this is not being complied with, regrettably.

Most guests to weddings would arrive by private vehicle, and there are few, if any, alternatives since there is no realistic access by public transport or safe walking routes to nearby bus stops, nor are there safe and convenient routes for cyclists and pedestrians. No Travel Plan could be effective in such circumstances.

The fact remains that the premises are served by an unsuitable highway network that is simply incapable of safely accommodating the extra traffic generated by 200 wedding guests and associated services. This constitutes a hazard to all road users and severely prejudices public safety, which should not, in the public interest, be countenanced.

6. Prevention of Public Nuisance

This is our clients' principal concern and relates to issues including the proposed hours of operation, noise emanating from the premises, nuisance and lighting.

We consider that the character of the hamlet of Farleigh Hungerford, Farleigh House and the countryside are all intrinsically bound together and present a quiet rural location where apart from the shouts from the rugby training ground and related noise (e.g. car doors slamming) passing traffic is normally the only interruption to the tranquillity which pervades this locality apart from long-established sounds of the countryside and farming activities.

The wedding events, functions and private parties which would be held at the premises would be very different in nature. A wedding or a party is an excuse to get together with family and friends and celebrate. The object of the proposal and licence is to create a business which would allow for such events across the premises, including a marquee, which would increase numbers of guests to 200 – see Figure 3 overleaf².

The Farleigh House website refers to:

'Champagne, canapés and jazz are just some of elements you can add to the romance of the rose garden and dancing hand in hand on the lawn. Receptions, ceremonies and

² Photograph courtesy of https://cocoweddingvenues.co.uk/coco_listing/farleigh-house/

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

breakfasts under a sailcloth marquee with panoramic views. We can't wait to see what you do with the place.'



Figure 3 – Marquee at Farleigh House (see Footnote 2 for source)

We understand that BRL would have a noise reduction plan, use special speakers, set noise levels, test noise with a meter and direct noise equipment away from the hamlet.

However, there has been no detailed noise assessment to establish the ambient noise levels late in the evening and early in the morning (e.g. 1.00am) when music will be being played at functions held at the premises. Music, microphones and entertainment are not limited to areas within the buildings and sound amplification systems rely on not being tampered with to increase music sound levels and [internally] usually require doors/windows to remain closed other than when entering and exiting the premises to be effective. Use of the premises with doors open and via the marquee with guests spilling out into the open air to enjoy a warm summer evening socialising and enjoying the event with no acoustic mitigation would lead to the uncontrolled emission of noise.

It is not conceivable that on a hot summer afternoon/evening that staff are going to be able to control the behaviour of guests sufficient to prevent doors and windows being opened to ventilate the spaces within the building. Guests will also want to enjoy the gardens and seating areas of the House grounds close to the event spaces as well as around the wider grounds. In this quiet rural location it is inevitable that the sound of music, talking, singing, etc. would be audible outside of the event spaces. As the event extends into the evening it is also likely that the volume of people talking etc would increase as the level of enjoyment increases.

Without a detailed noise assessment and mitigation package, it is impossible to assess the level of noise emanating from the premises and gauge the public nuisance this will cause to our clients and other local residents, some of whom live just 270m away (i.e. at East Lodge). The sound emanating from the premises is bound to be audible within the neighbouring properties. The nature of the sound also needs to be considered. As already set out above the House, neighbouring properties and hamlet are set in a relatively quiet environment where there is little background noise other than that which is expected and characteristic of a countryside setting. Music being played, however distant, along with the sound of revellers, late into the evening 7 days a week would cut through the tranquillity of the area, supported by the prevailing winds and topography between the House and

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78



Chadwick Town Planning

neighbouring properties. This is borne out by evidence of local residents who already report hearing noise from the rugby training ground and functions at the House.

Noise, disturbance and nuisance would also arise from the arrival and departure of guests, which would extend beyond the 1.00am, and then be followed by the departure of staff and suppliers so likely to extend to between 1.30am and 2.00am at best, further disturbing local residents and their sleep, after the first "surge" of departures. Late evening movements would amount to an unaccustomed level of traffic at what is likely to be an otherwise exceptionally quiet time, and we have no doubt that it would seriously disturb the sleep of local residents, the quality of life of neighbours and the tranquillity of the area. One of the worst affected would be East Lodge, where taxis and mini-buses have dropped-off or picked-up guests late in the evening or at night causing nuisance to neighbouring residents. See Figure 4. Floodlighting around the marquee (see Figure 3) and around the grounds simply adds to light pollution, ruining "dark skies", drawing attention to the activities and causing visual as well as audible/noise nuisance.



Figure 4 – Taxi Drop-off/Pick-up Area next to East Lodge

For all of these reasons the living conditions of the neighbouring residents would be unacceptably harmed by reason of noise, disturbance and public nuisance. This would be late into the evening and early morning when local residents would not unreasonably expect a quiet night-time environment so they can sleep, rest and enjoy an undisturbed night. Nuisance would be caused by the use of the House, event spaces and associated outside areas, local roads and drop-off/pick-up areas. This combined with the incessant frequency of events and large numbers of guests involved would be intolerable for residents and cannot be satisfactorily mitigated or controlled by BRL.

7. Protection of children from harm

We note that this relates to protecting children from the activities carried out on the premises whilst they are there attending weddings and functions and that the law already provides special protections for children under 18 to buy alcohol.

We therefore make no further comment on this matter.

8. Conclusion

The existing planning permissions were largely granted and conditions imposed to safeguard the living conditions for occupants of neighbouring properties. These relate to limited daytime activities at Farleigh House by a comparatively small number of visitors and associated vehicle movements.

The proposed licensed use of the premises – in addition to existing authorised use – by up to 200 guests for weddings and functions every day, including weekends and Bank Holidays, late into the evening and early morning is a materially different use, on a much larger (400%) and more intensive scale, with a definable change in the character of the use [unrelated to the principal, rugby-related use and having significantly greater off-site impacts, strongly indicates to us, our clients and many other local residents that a

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963

VAT Registration No. 371 4873 78



Chadwick Town Planning

material change of use has occurred without planning permission. We therefore consider 'the appropriate form of permission is not in place' and conflicts with Somerset Council's Licensing Policy.

The information supplied by BRL is scant, absent of a noise assessment and simply inadequate to enable the Licensing Department to reasonably, fairly and properly reach a rational judgement on public safety and the prevention of public nuisance from the premises, including most critically the proposed hours of operation and the amount of noise likely to emanate from the premises.

However, in the context of celebratory events attended by relatively large numbers, whether consuming alcohol or not, we consider that even with the best will in the world noise will be generated that will be audible at many of the neighbouring residential properties, and that will be of a type and at volumes and/or frequencies that will cause serious nuisance, disturbance and harm to living conditions of local residents. This would be intolerable, unreasonable and must be prevented.

Farleigh House is not served by an adequate road network which can accommodate even current traffic properly let alone the additional traffic likely to be generated by up to 200 wedding guests plus numerous staff, suppliers and associated deliveries without creating serious traffic hazards and jeopardising public safety.

For all of these reasons, we urge the Licensing Authority to refuse the new premises licence. If the application is refused, as it should be, any temporary event licence would be subject to the same conditions and concerns and would be similarly be inappropriate for the same reasons.

If you require any further information please do not hesitate to contact me.

Yours faithfully,

Duncan Chadwick
Managing Director

Chadwick Town Planning Limited

Registered Office: 7 Rectory Road, Hook Norton, Banbury, Oxfordshire, OX15 5QQ



+44 (0)7415 867344

duncan@chadwicktownplanning.co.uk

www.chadwicktownplanning.co.uk

Registered in England: No. 13175963
VAT Registration No. 371 4873 78