



**Kent
Police**

Chief Officer of Police Representation in relation to an application
for grant of premises licence made under Part 3 Section 17
Licensing Act 2003 (S18 Licensing Act 2003)

Details of person making objection

Name of Chief Officer of Police	Chief Supt White 15754
Postal Address: (Area Headquarters)	C/O Medway Police Station Purser Way Gillingham Kent ME71NE
E-mail address	daniel.hunt@kent.police.uk
Telephone Number:	01634 792388

Details of premises representation is about

Name of Premises:	Great Lines Heritage Park
Address of premises:	Great Lines Heritage Park Brompton Road Gillingham Kent ME75DH
Date application received by police	28 th November 2022
Date representation sent to Licensing Authority	22 nd December 2022
<p><i>Must be within 28 days of receipt – The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005, Part 4 Reg. 22.</i></p>	

The Chief Officer of Police has received an application for the grant of a premises licence made under the provisions of Section 17 Licensing Act 2003, and under Section 18 of that Act, asks the Licensing Authority to consider these representations in respect of: -

Please tick one or more of the licensing objectives that the representation relates to:

Prevention of crime and disorder	<input checked="" type="checkbox"/>
Public Safety	<input checked="" type="checkbox"/>
Prevention of public nuisance	<input checked="" type="checkbox"/>
Protection of children from harm	<input type="checkbox"/>

Is this a representation regarding the Designation of Premises Supervisor under S18 (9) Licensing Act 2003? **NO**

If yes, complete the following statement: -

The relevant representation within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(9) of that Act and are as follows:

Due to the exceptional circumstances of this case, I am satisfied that the designation of the person concerned as the premises supervisor under the premises licence would undermine the crime prevention objective because

N/A

Please use separate sheets where necessary

The relevant representations within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(7) of that Act and are as follows:

Please give the reason for the representation and detail the evidence supporting it:

Please see attached document entitled "Great Lines Representations"

Please use separate sheets where necessary

Suggested conditions that could be added to the licence to remedy the representation or other suggestions the Licensing Sub Committee may take into account:

Please use separate sheets where necessary. Consider s106 Licensing Act 2003.

Please see attached document entitled "Great Lines Representations"

Kent Police are opposed to this application.

Signed:

Date: 22\12\2022

Print name: PC HUNT (licensing officer)

Force Number: 11044

pp Chief Officer of Police for the Police Area in which the licensed premises are situated

Representation may be made at any time during the 28 consecutive days starting on the day after the day on which the application to which it relates was given to the authority by the applicant. Please return this form along with any additional sheets to the Licensing Authority. This form must be returned within the Statutory Period.

Great Lines Representations

This is an application for a new premises licence for The Great Lines Heritage Park, Brompton Road Gillingham Kent. If granted as applied, this premises would operate as a music festival events space authorised to conduct the following licenced activities:

- Provision of regulated entertainment including plays, films, live music, recorded music and performance of dance Friday 17:00 to 22:00, Saturday 11:00 to 22:30 and Sunday 10:30 to 18:30.
- Supply of alcohol on the premises Friday 17:00 to 21:45, Saturday 11:00 to 22:00 and Sunday 14:00 to 21:30.

The premises licence will be restricted to a 4-day music festival event once yearly, with day 4 currently proposed as a family fun for which licensable activity has not been applied. The maximum permitted numbers at any one time would be restricted to 24,999 persons.

Further to the above, on 21st December 2022 it became apparent to Kent Police that the applicant intends to conduct licensable activity on day 4 of the event (Monday) but had failed to request this on the premises licence application form. This was considered an oversight or error and the application has now been amended to have licenced activity across all 4 days, with the sale of alcohol and provision of regulated entertainment authorised on Monday 10:30 to 18:30.

Great Lines Heritage Park is a mainly grassland site spanning approximately 170 acres. Medway Council Website describes this as Green Flag Award area with facilities including cycle routes, nature walks, walking routes and with a wild-flower area. Despite its size, Great Lines Heritage Park is located on the edge of a heavily populated residential area, which hundreds if not thousands of homes surrounding the park on at least two of its borders, namely the area known locally as the army estate with ministry of defence housing and family homes to one side, and Marlborough Road and the houses beyond on the other. The proposed plan clearly shows the proximity these residential areas have to the site. To the top of Marlborough Road, just out of picture on the plan beyond the school you will find the main accident and emergency hospital servicing the Medway Towns, The Medway Maritime Hospital.

Attached to this application, Stardust Festivals Ltd has offered a total of 74 proposed premises licence conditions that they feel are necessary to promote the licensing objectives, many of which reference the event safety management plan, a draft copy of which has also been submitted with the application. Despite the information contained within, clarification is still sort in many areas and at this stage Kent Police are unable to support this application. Kent Police concerns relate to 3 of the 4 licensing objectives namely:

- Prevention of crime and disorder
- Prevention of public nuisance
- Public safety

Whilst the premises licence would allow for up to 24,999 persons each day, it is understood that the makeup of the event scheduled for the site in 2023 with consist of the following:

- Friday 26th May – Classical Opera event, capacity 5000 persons
- Saturday 27th May – Dance music event, capacity 25000 persons

- Sunday 28th May – 80's, 90's & 00's event, capacity 15000 persons
- Monday 29th May – Family community festival event, capacity 15000 persons

Traffic management and road closures

The event safety management plan (ESMP) provides a breakdown of the suggested travel means by which persons will travel to the festival. Further information was sought from the applicant as to how they reached the suggested figures which include 45% travelling by train, the nearest train station being Gillingham located at the far end of the main High Street and only 10% of persons travelling by car with a subsequent need for car parking. The applicant has since advised that the forecast has been prepared from experience of operating similar events, the expected demographic of each day and the expected heatmap of ticket sales, whilst recognising that as this is a new event at an untested location and therefore the forecast is subject to change. Kent Police are concerned that the figure relating to persons travelling by car has been underestimated. The ESMP states a park and ride facility will be established at the nearby Greenwich University Campus at Chatham. Kent Police are concerned re the size of this proposed site and as to the number of parking space available and clarification was sought with the applicant. The applicant has since advised that 4 park and ride sites are now under consideration, namely University of Greenwich, Pentagon car park, Historic Dockyard and Lloyds car park Chatham. The applicant has provided no information as to the size of each site, the number of parking spaces for each site or confirmation that any site is confirmed or booked for the event. What if agreement cannot be reached to use these facilities or after consultation such sites are not deemed suitable? Gillingham town centre and the immediate area to the event site has limited availability for further parking such as pay and display, many of the residential streets are narrow terraced style roads many with parking restrictions and residential permit parking. Kent Police are concerned that events on the scale of those proposed are likely to result in high levels of illegal, inconsiderate, dangerous parking causing a nuisance to the public, a nuisance to residents who's access to regular parking is already limited, traffic congestion and safety concerns.

Regarding the park and ride, it is understood that Brompton Road will be subject to a road closure, and it is here that buses will park for the dropping off and picking up of passengers. It is also understood that as a contingency in case of a reduced train service, cancellations, strike action etc that a train replacement service by way of additional buses transporting persons from London will be implemented. Further clarity is sought regarding the suitability of Brompton Road being used as a bus drop off point. Will buses be required to turn in this area? Is there sufficient space available for the expectant number of buses to park? Is there sufficient space for buses to safely pass each other if required?

It is understood that a series of road closures will be implemented. Marlborough Road is intended to be closed for the duration of the festival, with only residential and emergency access permitted. Our immediate concern is that Marlborough Road serves as a through road with rear access directly into the grounds of the Medway Maritime Hospital. Emergency service vehicles and the public use this route daily to access the hospital. Whilst the hospital grounds are accessible via a different route and entrance, there will undoubtedly be delays in travel time as persons divert around this closure, through the town centres that are likely to already be busy suffering the effects of additional vehicles and congestion of vehicles travelling to or from the event. Whilst it is appreciated that emergency access will be granted through the road closure, being so close to the pedestrian entrance to the site, Marlborough Road is likely to be bustling with pedestrians gathering and congregating in the roadway beyond the closure. Any vehicles travelling through the road closure be them resident or emergency vehicle will have to navigate through these pedestrians. What

measures would be in place to ensure the safe passage of vehicles through pedestrian traffic? This area of concern has been brought to the attention of the applicant who has advised that pedestrians leaving the event will be directed to access and egress via Brompton Road and to avoid the use of Marlborough Road to ensure it is clear for emergency service vehicles and residents. Experience of events of this size and nature suggests that it will be very difficult for event organisers to keep Marlborough Road clear and free of any pedestrian traffic or movement. As stated, Brompton Road is said to be subject of road closures at peak times, clarification is sought as to such timings. The ESMP states that road closures are planned for the army estate and Sally Port Garden areas with this area also used as the intended route for vehicle access both for the set up and dismantling of equipment to the site. Kent Police are concerned re the impact and disturbance this will cause to families living on this estate and have sought clarification as to whether the MOD have been consulted regarding using this route as an access. The applicant has since advised regarding a change of access into the site for production vehicles for the build and breakdown of the event site. This access is said to now be direct entry to the site via Brompton Road. From the image supplied it seems that access for production vehicles will be across the MOD sports field via a narrow entrance and will require the removal of some fencing presumably with MOD authorisation. Is the applicant content that this entrance is suitable for large, presumably heavy goods vehicles?

SIA and stewarding

ESMP provides a breakdown of the number of personal on duty dependant on the event day and expectant number in attendance. For example, Friday Opera event for 5000 persons suggests 65 personnel. What is not clear is a more detailed breakdown of staff, for example of that 65 how many are stewards and how many are SIA? Further clarity has been sought.

ESMP clearly states that SIA and stewards are only responsible for the management and security of persons within the event site, not outside. Balance of probability suggests a 4-day music festival of up to 25000 persons each day will generate a significant amount of crime, disorder, ASB and nuisance within the immediate area, namely Gillingham Town Centre and potentially to the neighbouring towns of Chatham and Rochester all of which are only a short walk away. It is appreciated that the police have a responsibility to patrol and deal with offences occurring within the town centres as part of our core duties. Such an event is likely to have a massive impact on police resources. The applicant has provided little information to suggest what steps they intend to take to help prevent issues occurring outside their event space. They have suggested they will deploy resources to pick up points, bus stops, park and ride areas and the train station and have also suggested the deployment of a dedicated community response team in a van to deal with problems at specific locations.

CCTV

Further clarification is sought with regards to the proposed use of CCTV around the site, be that the locations of fixed CCTV cameras, the availability of the CCTV being provided to both police and other authorised persons, the use of body worn cameras etc. CCTV will provide best evidence with regards to incidents and evidence capture, as well as being a significant crime prevention tool. It would be imperative that best use is made of CCTV. It would appear from recent discussion with the applicant that CCTV usage has not been finalised with the applicant advising the full details regarding CCTV use can be ironed out during the continued planning process.

Police presence on site

ESMP and proposed premises licence conditions both reference police being on site for the duration of the event and being available to assist staff as and when required, for example to arrest persons found in possession of illegal drugs. To date, no such agreement has been reached regarding police attendance at the event.

Additional information

Gillingham High Street and the surrounding areas suffer widespread multiple deprivation. Medway council statement of licensing policy provides evidence that the immediate area already suffers unacceptably high rates of:

- Alcohol related crime and disorder
- ASB
- Criminal damage
- Assault
- Public order
- Arrest for public order and drunk and disorder offences
- Alcohol related hospital admissions
- Alcohol related ambulance callouts

Kent Police are concerned that the granting of the licence, albeit for just a once a year 4-day event could add to and increase such issues.

The nearest train station to the site is Gillingham, located at the far end of High Street approximately 5-10 minutes away by foot. With up to 45% of persons predicted to be travelling by train and the significant number of persons in attendance, the High Street and town centre will be extremely busy. Clearly the application suggests facilities such as bins and customer toilets within the event space, but clarification is sought regarding additional facilities such as toilets and bins being positioned outside of the event space. It is probable that without such additional facilities, the limited public toilets and bins already established in the town centre would be insufficient to cope with demand and therefore an increase in issues such as littering and public urination within the town centre is likely.

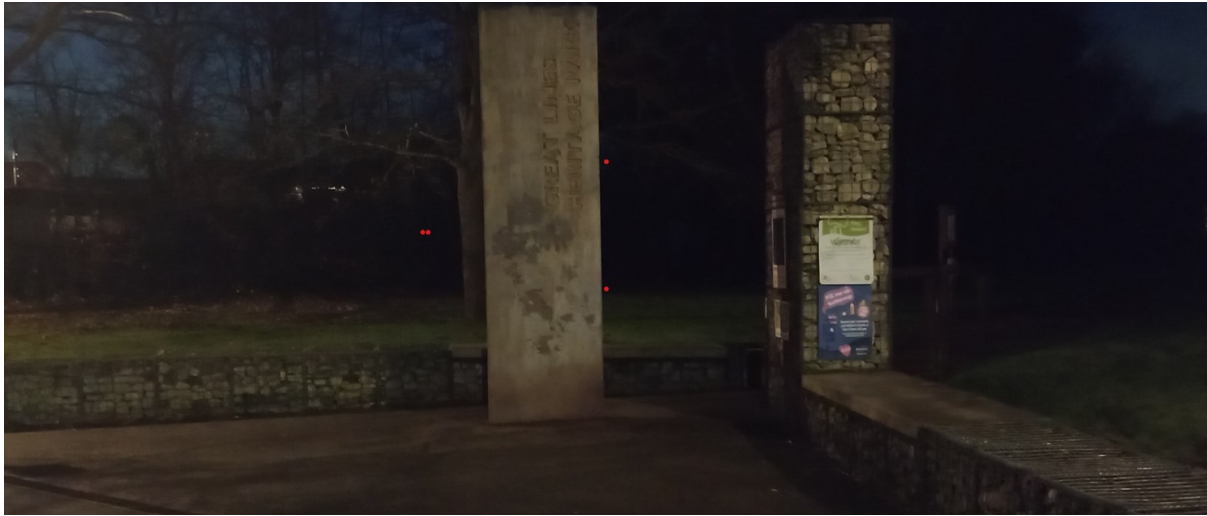
Noise nuisance

Whilst local authority environmental health officers are best placed to provide expert knowledge and opinion in areas such as acceptable noise levels and music limits, Kent Police are concerned that a music festival will undoubtedly cause a noise nuisance and cause disturbance to persons and families living in the immediate area surrounding the site. In addition, Kent Police would have concern regarding the impact that any noise nuisance could have on patients receiving care at the Medway Maritime Hospital. In addition to the music noise, consideration must also be given to general crowd noise, generators etc that may be required to operate food vans and fairground rides over a 4-day period located close to residential properties.

Main pedestrian entrance

The proposed main entrance and exit for customers as shown on the site plan is located on Brompton Road, near to the junction of Marlborough Road (opposite the Medway Park Sports Centre). Please see attached photos. Up to 25,000 persons accessing or exiting the site each day would have to filter through a relatively narrow opening or entrance way or negotiate a small wall

surrounding this corner of the site. This represents a possible pinch point for crowding and the wall poses a risk of injury or fall, especially when considering the availability of alcohol and probable levels of intoxication of some persons in attendance.



Great Lines Heritage Park extends beyond the limits of the proposed licenced area. Beyond the boundary of the site where we find the food courts, bar 7 and ride 5, lies further park land including the naval monument, and vast grassed areas leading down towards Chatham town centre. The grass in this area is wild and not mown as it would be in the event space. During previous hot weather and dry spells this area has been subject to fires that have spread requiring an emergency response from Kent Fire and Rescue. What provisions have been put in place to ensure that festival goers do not camp in such areas, do not use disposal barbeques, have campfires etc? It is possible that if there were to be a fire at this location whilst the music festival is ongoing, emergency service access may be impeded. Any fire at this location would likely impact the event.

Previous events

A Stardust Festivals Ltd portfolio document recently shared with partners highlights previous events associated with the applicant entitled "Team Showreel Highlights" and references a 2022 Dream Valley event held at Lydd Airport in Kent on 28th May 2022. This was a 1-day dance music event with an audience of 15000 persons.

It is our understanding that Lydd airport was not the original site intended for this event. Two sites had been sought prior to Lydd airport, sites in London boroughs of Bexley and Bromley. It is understood that Bexley Council decided against allowing their land to be used for the event and a premises licence for the Bromley site was refused by licensing sub-committee at a licensing hearing. Some concerns for that site are similar in nature to concerns listed above. It is thought that Great Lines Heritage Park 2023 is a replacement venue for Lydd airport.

Kent Police have concerns and observations regarding the event held at Lydd airport 2022.

Much the same as proposed within this application, the ESMP suggested that persons found to be in possession of illegal substances and drugs would be refused admission or ejected from site. Kent Police established that despite drug finds, customers were still allowed admission into the event. It was noted that the medical tent was considerably busy with incidents of over intoxication through probable drug misuse, that perhaps could have been avoided had the security plan been adhered to. Nitrous oxide was listed as being a prohibited item. It became apparent that nitrous oxide use was prevalent during the event, not only were cream dispenser cannisters in use, large size cannisters were also used. Kent Police have subsequently investigated a reported grievous bodily harm assault occurring inside the event space whereby a victim was assaulted with an alleged nitrous oxide / laughing gas cannister resulting in significant facial injuries that required corrective surgery at hospital. Security was also not fully compliant with the ESMP in areas such as the use of body worn CCTV cameras during the enhanced searching practice.

Police were advised that adult males had been seen getting through Heras fencing repeatedly during the event.

Significant traffic delays were experienced when exiting the site. Ambulance access to the site during egress was difficult and posed a risk to customers. These significant traffic delays along with an issue experienced at coach pick up area whereby coaches had difficulty passing each other, led to customers becoming stranded and missing trains home.

Kent Police responded to multiple event related CADs and reports of incident in both the immediate area of Lydd and indeed to reports of disturbance in neighbouring towns such as Ashford.

Kent Police are opposed to this application.

Should the licensing sub-committee be minded and grant a premises licence for this location, we would respectfully request that this be a 1-day test event only with reduced capacity on a time limited licence. To our knowledge, no such event of this size and type has ever been held on this site. A test event would provide both the applicant, the landowners, responsible authority and residents a better understanding regarding the suitability of the site to hold such events and would also allow the organiser the opportunity to evidence their ability to manage a smaller test event and leave Kent Police with no concerns regarding the ability of the event organiser and premises licence holder to manage a larger event where it would become of vital importance that they remain fully compliant with the agreed ESMP for the event.

Should the licensing sub-committee be minded not to consider a 1-day licence and test event, Kent Police would seek that the licence be conditioned accordingly so as this could not evolve into a 4-day dance music festival with 100,000 persons in attendance over a 4-day period.