

LICENSING ACT 2003  
REPRESENTATION FORM

Other Persons

Name/Company Name/Name of Body you represent	Mr. D. J and J. Peters
Postal & email address	[REDACTED]
Telephone number	[REDACTED]

17 JAN 2023

Name & Address of premises for which the representation is being made  
REF APPLICATION 22/04161/LPREM  
LUDNOW RUGBY FOOTBALL CLUB  
KINNEY, LUDNOW, SY8 1EE

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

SEE ATTACHED  
NOTE 1

TO PREVENT PUBLIC NUISANCE

SEE ATTACHED  
NOTE 2

TO PREVENT CRIME & DISORDER

SEE ATTACHED  
NOTE 3

PUBLIC SAFETY

SEE ATTACHED  
NOTE 4

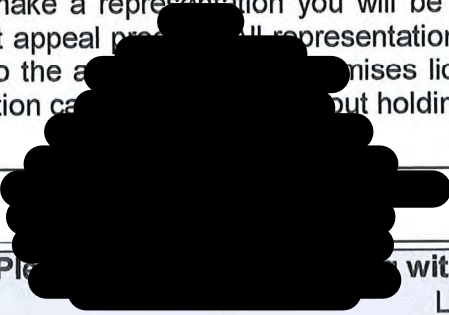
Suggested conditions that could be added to the licence to remedy your representation or other suggestions you would like the Licensing Sub Committee to take into account. Please use separate sheets where necessary - refer to checklist.

NONE that would make this application reasonable.

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 proceedings. All representations in their entirety, including your name and address, will be disclosed to the applicant, the premises licence and any other interested parties. If all parties agree, the application can be determined without holding a hearing.

Signed:



Date:

11. 01. 23

Please return this form 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

**Representation to Shropshire Licensing Authority with regards to the establishing of a new Public Entertainment Venue at Ludlow Rugby Club, the Linney, Ludlow, SY8 1EE by the granting of an Entertainments Licence to the Applicant.**

I strongly oppose this application for the following reasons. In deference to your required format I will list them as requested under the appropriate headings

However before I start, I must state that I cannot, under any circumstances see how you can ignore the fact that when the ground was purchased by Ludlow Rugby Club a covenant was applied to the sale/purchase which stated that future use of the ground could **only be for "sporting purposes"** Additionally when Planning permission for the existing Clubhouse and other facilities was applied for and granted, by the then South Shropshire District Council it specifically stated permission was granted only on the understanding that the facilities would **could be used for "sporting purposes"**. I know this to be correct as I was the facilitator in both instances. Therefore to grant such a dramatic '**change of use**' must be surely considered questionable and even unlawful.

To continue in the prescribed format

Note 1 "Prevention of harm to children"

- a. The western boundary is an unfenced river bank allowing uninhibited access to the River Teme via an unmaintained River Bank. No Safety equipment. No signage An obvious risk
- b. A Public Footpath access from the Linney Childrens Playground run the full length of the river bank. Public access cannot be denied. The risk is exacerbated.
- c. The Rugby Club is adjacent to the Linney Childrens Playground where unsupervised groups congregate. As part of this facility there is a full length football pitch, it attracts all age groups. To provide for a late night drinking venue immediately adjacent would be irresponsible. Access between the proposed venue and the playground is easy with minimal restriction. Of course as there is a public footpath fully restricted access cannot be applied..
- d. The playing of music until the 'early hours' would attract anti social behaviour on the recreational facilities - even if they did not enter Rugby Club property
- e. The new venue would diminish the attraction of the playground provided for children of all age groups but particularly the young as is would discourage responsible parents to attend and also reduce available parking.

Note 2 To "Prevent Public Nuisance"

The location of the proposed Public Entertainment Venue could not be more unsuitable.

- a. Access is totally inadequate. The Linney is virtually 'single lane' and yet has a two way traffic system. It has notorious pinch points at both its ends. There is frequent chaos with current usage as vehicle cannot pass each other. Property frequently damaged. Historic walls particularly around the churchyard impacted. Larger vehicles cannot circumnavigate its length. This is a well known fact, locally. A road to avoid unless access is essential
- b. The Linney is basically flat but surrounded by the elevated town of Ludlow. This creates a *cauldron* effect which retains and amplifies sound. Any music played in the existing Clubhouse can be heard clearly with minimal loss of decibels in the whole of the residential area. This comment is not speculative but based on fact and the experience of the many unlicensed events which already take place there. The Club have always ignored complaints as they are not personally aware of level of nuisance involved - no Officers of the Club are in situ when this nuisance occurs, only part time Bar Staff. This cauldron is so effective that even the voices of players training and during matches can be heard distinctly. Its [ the Rugby Clubs} immediate

neighbours, tolerate nuisance as its considered part of being a 'Sporting Venue'. But only just. To increase the noise level and extend the period they [ the adjacent residents] would be subjected intolerable and grossly unfair level of noise disturbance.

- c. It is certainly not unusual for fireworks to be used during some events. Indeed weddings parties seem to think it on trend to consummate the nuptials with as many big bangs as possible. And we are talking big bangs. Mortars. In the past other Ludlow Entertainment Venues have even used the Rugby Club to have their firework displays, at the Linney, so as to to upset 'their' residents. They cause significant shock and distress to all the Linney residents who are mainly elderly. Pets are also terrified. There is no warning. Bang. To grant a licence to promote this activity would be irresponsible especially in this day and age of Health and Safety.
- d. The drinking of alcohol to excess is *des rigueur* at most Entertainment Venues. It is no exception here. The Linney and all the gardens adjacent ,regularly have to clear up the detritus of late hour drinking at current levels of activity. It will be a full time job in future if this licence were to be granted. Intolerable.
- e. The Rugby Club is totally within the Ludlow Conservation Area, as are the adjacent fields. The most immediate having Stables and Horses. It is an area of *Outstanding Natural Beauty*. It has a protected eco system. It is on a such a vulnerable flood plain that it is unlikely that the original Planning Permission would be granted in this day and age. To allow this Licence would be an act of vandalism and certainly contrary to any 'Green Agenda'

**Important Note. There is already a suggestion that the Ludlow Food Festival will relocate to the Linney. This is more than a rumour as marketing has commenced even before the granting of an Entertainment Licence. This is a huge event. 30,000 people over 3 days. However it should be noted that this event actually encompasses nearly 3 WEEKS as its such a large event the setting up and the taking down is considerable. It involves mega marquees and ancillaries such an event must have. If this goes ahead there are at least two other major festivals in the Ludlow annual schedule watching how this develops ie/ the Spring Drinking Festival and the Medieval Fair both will similar logistics. Of course there is also the Fringe Arts Festival looking for a 'home'. This is two weeks long. We are not talking about minor events when we object. This has a major impact on a Residential area it really goes way beyond being a nuisance.**

#### Note 3. To Prevent Crime and Disorder

- a. The Linney already has a number of areas that attract low level crime, disorder and vandalism . This, in the main takes place with late night activity. Vulnerable areas include the playground and river side park which are immediately adjacent to the Rugby Club. But there are other areas, as the Linney is not well lit. There are two Church Yards which attract activities far worse than drink. One of the key access roads to the Linney directly from the town {Upper Linney} have virtually no pavements, cobbles and is narrow unsafe for cars and pedestrians to combine. It, even now, suffers from noise disorder and acts of vandalism. Increased footfall is bound to exacerbate this.

#### Note 4. Public Safety

- a. It is fair to say that the Linney [ the road ] is not '*fit for purpose*' with the demands of modern traffic. Vehicles go faster. They are bigger. There are more of them. And inconceivable though it is, there is an on street Parking Scheme which reduces the majority of the Linney to a single lane.
- b. Pedestrians and there are many, as this is a popular walk for visitors and tourists, are taking a risk everytime they perambulate its length. There is only one badly maintained pavement and this no more than two feet wide. The road is very poorly lit - not at all in some places. Vehicles already cause significant damage to property. However its only question time before a

pedestrian will sustain serious injury whilst walking our street. And thats with current levels of vehicle usage. It is a very dangerous road for pedestrians. Most of whom are elderly. It is already a very dangerous road. The old cliché - *an accident waiting to happen* certainly applies here. Anything which increases traffic flow on this totally unsuitable road should be condemned.

Mr. D.J.Peters and Mrs J. Peters

