

**From:**

**Sent:** 19 March 2026 12:51

**To:**

**Cc:** Licensing <licensing@herefordshire.gov.uk>

**Subject:** RE: OUT TO GRASS - LICENCE REVIEW - SUBMISSIONS EH RESPONSE TO LICENCE HOLDER

OFFICIAL

Good Afternoon,

### **Ref - Response to Out to Grass (OTG) documents and Licensing conditions proposals**

I confirm Environmental health have received OTG Licence condition proposals, documents and noise management plan (NMP) provided as part of this Licence review. We have further considered this information and comments as follows:-

It is noted, the NMP and proposals has been completed by Claire Kelly – we are not aware of Ms Kellys qualification and expertise in acoustics and noise controls. The documents make reference to consulting a sound engineer. For the noise management plan we would be requiring an appropriately qualified noise control expert to have input on the Noise management plan to ensure all aspects of sound control has been considered i.e. the **sound source** – type of music, sound system etc, **sound pathways** - premises structure and layout effectiveness of barriers, and impact at **receptors** - noise levels/ audibility's assessment at noise sensitive premises (impact on garden and inside premises to be considered due to duration and frequency of events and public nuisance to the general area).

We reviewed Out to Grass's proposed conditions and agreed to some, with changes to wording for others. However, the high number of large events proposed and lack of limits on smaller events are concerning, as we consider these conditions are unlikely to improve compliance with meeting the 'Prevention of Public Nuisance' licensing objective. This is mainly due to the following points of concern:-

- **Structure** – very little to no sound attenuation properties for the entertainment structures on site and some events have outside entertainment stages.
- **Site and Location** - The site is located in a quiet rural and tranquil area, both in the day and even more so at night.
- **Level and type of music** – Typical music played on the site is loud amplified music with a heavy drum and bass character and bass drops.
- **Duration of events** – currently the conditions permit very long and frequent music events running from 12:00 noon through to 02:00 over the weekends and slightly reduced time over the weekdays. These were initially considered in 2013 with the main event activity being two weekend music festival a year. The business model for the premises has significantly changed since this date, now running mainly as a private function festival site throughout the summer months (6 months a year).
- **Number of events** - Entertainment at the site has expanded from two music festivals to a private hire venue and camping area, operating almost every summer weekend. N.B Standard planning procedures are typically required for alterations to a music entertainment venue, this has not been the case for this site activity; consequently, licensing conditions serve as the sole regulatory measures currently in force.
- **Premises History** – Over the past 25 years, Environmental Health has received repeated excessive noise complaints regarding the OTG Entertainment site. Despite ongoing guidance from Environmental Health Services and the issuance of Abatement Notices in 2001, 2015, and 2025, noise issues have persisted. While occasional reductions in noise were observed, typically coinciding with fewer events, these improvements were temporary, and the concerns returned with little to no improvement.

- **Confidence in management** – The overall management of the site has not been changed over the 25 years. Considering all the above mentioned factors including extensive Environmental health involvement over the years the Authority currently has little to no confidence in the management for controlling entertainment noise on site.

Please find attached Environmental Health revised condition proposals to the committee. The conditions marked blue are agreed conditions with OTG proposals, Black are current (to remain) and red are Environmental health's proposed changes. All conditions with strike through to delete. These have been carefully considered with the balance of the business economic impact against its noise impact on the area. For the number of annual events we have made consideration to the 'Concert guide' that detailed an annual maximum of 12 music days (only up to midnight) and the Licensing TENs process where a maximum of 15 TEN days can be held per calendar year at a single premises. Our proposed 15 days music entertainment days are with the proviso the reduced hours and additional restrictions of 2 Large events only (max three day duration for each event) and the remaining days classed as small events, are applied.

The NMP in our proposed conditions is intended to be a key document for further controlling noise impact. The NMP would be required to distinguish between noise management controls for the two types of events. For the two Large events there will be an anticipated increased audible noise level to the area, however all the other small event would be required to implement stricter audibility control requirements, particularly later in the evening e.g. reduced audibility after 23:00 and further reduction after 00:00 (mid-night) to barely audible; no distinctive bass sound being audible over and above lower music levels at an agreed monitoring location.

Supplementary evidence of sound clips and additional noise guidance document are also being sent to Licensing for the committee hearing. Also attached is a revised Licensed area site plan as one Geodome was accidentally left out of previous plan – proposed changed to include family camping Geodome and café facilities area. For the sound clips it is noted the bass levels are the key factor for presenting these sound clips, so appropriate speaker / headphone systems will be required to fully hear this noise impact. (Environmental health will provide speaker for the licence Review hearing). Normal computer and TV speakers may not have the bass settings to adequately play this bass music noise.

Kind Regards