

OUT TO GRASS LEISURE LIMITED
SUPPLEMENTARY SUBMISSIONS ON BEHALF OF THE LICENCE

1. These submissions supplement the Applicants submissions that appear at pages 3 – 10 of Annex 1 of the Report to the Licensing Committee
2. Attached to these submissions are
 - (a) Further revised and updated operating schedule
 - (b) Proposed Plan
 - (c) Out to Grass (OTG) Noise Complaints Comparison

Revised and updated Operating Schedule

3. As part of their submissions the licence holder proposed an updated operating schedule that appears from page 25 of Annex 1 of the report to the Licensing Committee
4. On the 8 April a telephone call was held between the licence holder and Elisabeth Laughland, the EHO, from the Licensing Authority to see what, if any agreement, could be reached on a revised operating schedule. Ms Laughlands interest relates to the General Conditions that appear at 1 – 4 and this impacting on Public Nuisance at 9 to 31.
5. It is the licence holder's proposal that the proposed operating schedule replaces all of the conditions that currently attach to the premises licence at Appendix 2 to the report to the Licensing Committee
6. It is agreed that the capacity of the premises, inclusive of staff and performers, shall be no more than 500 people
7. It is further agreed that sale of alcohol and the provision of regulated entertainment is limited to the following days and times
 - Thursday 12:00 to 00:00
 - Friday and Saturday 12:00 to 02:00
 - Sunday 12:00 to 00:00

8. It is the licence holders understanding that save for condition 2 (the total number of days on which licensable activities can take place over the course of a calendar year) and condition 3 (the number of larger events that can be held at the premises) there is agreement on the conditions in so far as they impact on the licensing objective of the prevention of public nuisance.
9. The licence holder has also taken the opportunity of updating the operating schedule in so far as it impacts on the remaining 3 licensing objectives and removing ALL conditions that appear on the existing licence that relate to events with a capacity of over 500.
10. It is the licence holders' position that the further re vised operating schedule provides a balance between prompting the licensing objectives, directly addressing the concerns tha the review has raised, and that any detrimental financial impact that may result from the Licensing Authorities decision is appropriate and proportionate to the promotion of the licensing objectives.

Layout Plan

11. At page 9 of Annex 3 of the report to the Licensing Committee, the applicant for the review has proposed a new layout plan.
12. The proposed plan attached to these submissions reduces further the proposed area for the provision of licensable activities and excludes an area to the top of the plan that the EHO had sought to include within the licensed area.

Out to Grass (OTG) Noise Complaints Comparison

13. The Applicant for the review has provided at page 9 of Annex 2 to the report to the Licensing Committee a Noise complaints History in so far as it relates to OTG
14. In response to a FOI request made by the Licence Holder the Licensing Authority confirmed that in the 10 year period from 2015 to 2025 that a total 28 noise complaints were received.
15. A number of these complaints relate to days and times when OTG was closed for business.
16. An analysis of these complaints has been carried out. Some of the complaints are so historic, going back 16 years and for which no information is available (higoighted yellow).
17. Those occasions when complaints have been made and when the site was closed are highlighted in green.

National Licensing Policy Framework (NLPF)

18. The comments below supplement the submissions on National Guidance, Licensing Policy and wider council strategies that appear at paras. 4 – 8 n pages 4 – 7 at Annex 1 to the Report to the Licensing Committee.

19. In November 2025 HM Government issued their first National Licensing Policy Framework with aims to support:

- (i) Investment in existing and new venues
- (ii) Extend customer choice
- (iii) Regeneration
- (iv) Better regulation reducing unnecessary bureaucracy and enabling businesses to adapt quickly to the changing customer expectation

20. The NLPF states that *'The Licensing Act is designed to be enabling, not prescriptive'* and goes on to state that

'we need a licensing system that is flexible and responsive – a tool for enabling innovation and investment, not just managing risk... By making licensing predictable and proportionate, we aim to boost local economies and support local communities, create good jobs, keep costs down for consumers, and help meet the government's target to reduce administrative costs of regulatory burdens by 25%'

21. The framework also states:

'licensing should support a diverse range of venues and experiences that reflect the UK's rich hospitality and leisure offer and meet the needs of both domestic and international visitors'

22. Specifically, the framework recognises the need for:

- *light-touch for responsible operators – licensing should be permissive by design. Authorities should avoid unnecessary prescription and instead support operators to demonstrate how they are managing risks to the licensing objectives to a level that manages risks effectively and proportionately. This approach fosters innovation, reduces regulatory burden, and builds trust between regulators and businesses*

- *graduated enforcement – where issues arise, authorities should adopt a graduated response, starting with informal engagement and support, and escalating only where necessary. Enforcement should be proportionate, transparent, and focused on resolving problems rather than penalising businesses unnecessarily*

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