

Public Protection Partnership (Licensing),  
Theale Library,  
Church Street,  
Theale,  
Berkshire RG7 5BZ

Tuesday 31<sup>st</sup> March 2026

Dear Sir / Madam,

**Response to Representations – Premises Licence Application (Ref: IC APP 29442)**

Thank you for the opportunity to respond to the representations received in relation to our Premises Licence application for Benham Park Estate.

We are genuinely grateful to our neighbours and the wider community for taking the time to share their views. We fully recognise that Benham Park sits within a particularly quiet and sensitive rural setting, and that any proposed change, however limited, naturally raises questions and concerns.

For clarity, and to assist with context, we note that under the Licensing Act 2003 representations are considered in relation to the four licensing objectives: the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. We have therefore reviewed all comments carefully with these principles in mind.

Our intention in this response is not simply to address the points raised, but to provide reassurance, through both explanation and practical detail, as to how the estate will be operated in a thoughtful and responsible way.

At the heart of our approach is a simple commitment:

*‘To operate Benham Park in a thoughtful, carefully managed and respectful manner, and to build a positive, open and long-term relationship with our neighbours.’*

We recognise that some of the points raised within the representations relate to matters of planning or land use. We fully respect that these are important considerations; however, the Licensing Authority is required to determine this application by reference to the licensing objectives and solely in accordance with the provisions of the Licensing Act 2003.

In this context, we have focused our response on those matters which relate to the promotion of the licensing objectives, while ensuring that all concerns raised have been acknowledged and considered with care.

This response should be read alongside our Event Management Plan (EMP) and Noise Management Plan (NMP).

## 1. CLARITY ON SCALE AND FREQUENCY

Several of the concerns raised appear to stem from an understandable uncertainty regarding the scale and frequency of events.

The application provides for a maximum capacity of 500 guests; however, all events will be private, pre-booked and professionally managed, with no public or ticketed access.

To provide further reassurance, we would be pleased to propose the following conditions:

- The number of guests attending any licensable event will be capped at 250.
- Licensable events will be limited to no more than twenty in the first year of operation, with a maximum of thirty-five in all subsequent years.

This represents a firm operational cap rather than a target and not a level of activity we would seek to maximise.

In practical terms, this equates to fewer than three events per month on average. The estate will therefore remain quiet and unchanged for at least 330 days of the year, representing the significant majority of the time.

For clarity, the 250-guest capacity represents an upper limit rather than a typical operating level, and many events will be materially smaller in scale. There is no intention, nor operational capacity, for continuous or high-frequency use. This is a carefully controlled, low-intensity operation aligned with the wider vision for the estate.

We are also mindful of the parameters set by the extant planning permission, as well as the practical constraints of on-site car parking capacity and vehicle movements. The operation of the estate will always remain within these established parameters.

## 2. ENVIRONMENTAL HEALTH POSITION

We have worked closely with the Environmental Health team at West Berkshire Council throughout the preparation of this application, particularly in relation to noise.

Environmental Health have confirmed that they have no objection to the application and are satisfied that noise can be appropriately controlled without giving rise to a public nuisance. They have also confirmed their support for the licence being granted .

This provides independent professional reassurance that the measures set out within the Noise Management Plan are appropriate and proportionate to the setting.

## 3. ENGAGEMENT WITH LICENSING AUTHORITY AND POLICE

In addition to ongoing engagement with Environmental Health, we have worked proactively with the Licensing Authority at West Berkshire Council, who have in turn liaised with Thames Valley Police.

We have been informed that the Police Licensing Officer has raised no concerns in relation to the application, and the Licensing Authority has provided constructive feedback to ensure that the proposals are clear, proportionate and capable of being effectively enforced in practice.

This collaborative approach reflects our commitment to operating transparently, responsibly and in full accordance with regulatory expectations from the outset.

#### 4. NOISE – A CONTROLLED AND TECHNICAL APPROACH

We fully recognise that noise is the principal concern for neighbouring residents, particularly in a rural environment where background sound levels are naturally low. Our approach has therefore been to address this through a combination of design, layout and active management, rather than relying solely on reactive controls.

In practice, the principal elements of entertainment will be located within the main house, allowing the building fabric itself to provide a natural level of containment. External areas will be used in a limited and time-bound manner, primarily for ceremonies and early-stage receptions, which are inherently lower impact.

For clarity, any externally amplified music will be strictly time-limited and controlled, forming only a transitional part of the day, after which activity moves indoors. No externally amplified music will take place beyond agreed evening hours.

For further clarity, any reference to a maximum sound level of 95 decibels relates to measurements taken in close proximity to the sound source, typically immediately outside the main house or within designated event areas. This represents a control limit at source rather than the level experienced beyond the estate. In practice, due to distance, building containment, landscape features and acoustic mitigation measures, sound levels reduce materially as they travel across the parkland. By the time sound reaches neighbouring properties, levels will be significantly lower and consistent with Environmental Health guidance for rural environments.

Sound will be managed relative to existing background conditions and in accordance with Environmental Health guidance, with particular attention given to controlling low-frequency sound, which is more likely to travel across open landscapes. This ensures that noise levels remain appropriate to the rural setting, rather than relying on fixed decibel thresholds in isolation.

During events, sound levels will be actively monitored, with the ability to make immediate adjustments where required. Monitoring will be undertaken at all relevant events, with appropriate logging maintained throughout. Monitoring positions and methodology can be agreed in advance with Environmental Health to ensure a robust, consistent and transparent approach.

At any point where monitoring indicates that sound levels are approaching agreed thresholds at the site boundary, levels will be reduced immediately to ensure continued compliance.

To further support this, we will be working with Direct Acoustic Solutions, who specialise in acoustic design for events in sensitive environments. Their work includes directional speaker

systems, acoustic linings and sound attenuation within temporary structures, all designed to reduce noise breakout and contain sound within defined areas.

Taken together, this approach ensures that noise is not only managed but proactively controlled in a way that is appropriate to the setting.

## 5. EVENING MANAGEMENT AND DISPERSAL

We recognise that the conclusion of events and guest dispersal can be a particular concern, especially within a quiet rural setting.

Licensable events will therefore be managed in a structured and considered way, with the clear intention of ensuring that the end of the evening is calm, gradual and orderly, rather than abrupt or concentrated.

In practice, events will be designed to wind down progressively, allowing for phased departures rather than a single point of exit. Experienced staff will remain on site throughout this period to oversee guest movement, provide guidance where required, and ensure that behaviour remains appropriate and respectful.

External areas will continue to be actively supervised, helping to minimise unnecessary noise and support a calm, considerate and well-managed departure of guests. As the evening progresses, external activity will reduce, with later-stage elements of events contained within the building wherever possible.

Taxi and transport providers will be briefed in advance to operate considerately, including avoiding the use of horns, minimising engine idling, and ensuring quiet arrival and departure practices.

As this is not a high-volume events venue, all suppliers operate on a planned and controlled basis. Where appropriate, equipment breakdown and collection will take place during normal daytime working hours, rather than immediately following an event, thereby avoiding additional late-night activity.

Taken together, these measures ensure that dispersal is calm, controlled and respectful of neighbouring properties.

## 6. TRAFFIC AND ACCESS – A STRUCTURED APPROACH

We fully appreciate the concerns raised regarding local roads and access, particularly given the rural nature of the surrounding area, and have therefore taken a considered and practical approach to how traffic will be managed.

Through the Event Management Plan, all guests attending licensed events will be provided with clear routing instructions in advance. This will include a dedicated What3Words location pin for the East Gate, which will serve as the sole access and departure point for the estate. This ensures

that all vehicle movements are directed consistently and avoids any ambiguity that could otherwise lead to the use of inappropriate routes.

For the avoidance of doubt, no event-related traffic will be directed via private residential routes under any circumstances, and all guests will be required to follow the prescribed access arrangements.

Arrivals and departures will be planned and managed in a structured way, including staggered timings where appropriate, so that vehicle movements remain controlled and do not occur all at once.

Parking will be contained entirely within the estate and will be proportionate to the scale of each event. The estate benefits from consent for up to 103 vehicles to be parked on site, ensuring that all event-related parking can be fully accommodated within the estate boundaries without reliance on surrounding roads. In addition, the maximum number of vehicles permitted on site at any one time will be contractually agreed in advance, with security personnel positioned at the East Gate to monitor and manage vehicle numbers throughout the event.

We are also working closely with local accommodation partners, including The Vineyard at Stockcross and The Retreat at Elcot Park, both of which are experienced in supporting events in the local area. These venues have access to established taxi networks as well as minibus and shuttle transport options, allowing for more coordinated and efficient guest movement.

This approach supports a reduction in the number of individual vehicles travelling to and from the estate, encourages shared transport where appropriate, and provides guests with safe and convenient alternatives to driving. In practice, we would expect a proportion of guests to arrive via organised transfers or shared transport arrangements, further reducing overall traffic movements.

Taken together, and given the limited number of events proposed, traffic associated with the estate will be infrequent, carefully planned and actively managed, rather than continuous or unmanaged.

## **7. SECURITY, BOUNDARIES AND SAFETY**

Licensable events will be contained within the clearly defined area set out in the premises licence application, supported by active stewarding and on-site management. All events will operate under a strict responsible alcohol service policy, including Challenge 25, ensuring that the licensing objectives relating to the protection of children from harm and the prevention of crime and disorder are always upheld.

Boundaries will be actively always monitored and guest movement will be managed to ensure that activity remains within the estate. We recognise the proximity of neighbouring farmland and will ensure that event boundaries are clearly defined, stewarded and consistently maintained to prevent trespass. This is important both for guest safety and for the protection of livestock and adjoining land.

Areas outside of the defined event footprint, including the lake and wider parkland, will not be accessible to guests and will be appropriately controlled to ensure the safety of guests and the protection of the estate.

## **8. CCTV AND SECURITY INFRASTRUCTURE**

The estate benefits from a comprehensive 24-hour external CCTV system, comprising approximately 20 cameras covering key external areas, access points and boundary locations, including the ha-ha.

The system includes low-light and thermal capability, always ensuring effective coverage. In practice, this means there are no material blind spots, and activity can be monitored where necessary.

## **9. HELICOPTERS AND DRONES**

We note that concerns have been raised regarding helicopters and drones. These are not part of the premises licence application and do not form part of the standard operating model. Any such activity, if ever considered, would be subject to separate permissions and strict control.

## **10. RURAL CHARACTER AND STEWARDSHIP**

We are committed to preserving and enhancing the rural character of the estate, with careful consideration given to protecting its landscape, ecology and heritage for the long term.

This includes ongoing discussions with a local sheep farmer to support traditional land management, the introduction of beehives to encourage biodiversity and the development of a productive kitchen garden to supply seasonal ingredients grown on the estate. A herb garden will also be established, alongside carefully positioned beehives on the manor house roof, to further support pollinators and enrich the natural environment.

Lighting across the estate will be designed to be minimal, directional and sensitive to its surroundings, ensuring that light spill is controlled and that the dark-sky character of the area is preserved.

## **11. WORKING WITH OUR NEIGHBOURS**

We consider our relationship with neighbours to be of central importance and have already begun engaging directly, including hosting a Q&A session at the estate, sharing the Noise Management Plan and inviting ongoing dialogue.

We recognise that there can be a degree of uncertainty at this stage and see it as our responsibility to build confidence through openness, consistency and responsiveness.

To support this, we have proposed the formation of a small neighbour liaison group, providing a forum for ongoing communication and feedback as the estate begins to operate. A clear point of contact will also be provided to residents to ensure that any queries or concerns can be addressed promptly.

We are also committed to engaging with neighbouring landowners to ensure that boundaries are clearly understood and appropriately managed.

## 12. PROFESSIONAL DELIVERY AND OPERATIONAL CONTROL

All events will be delivered by experienced partners who regularly operate within historic and regulated environments, including heritage estates and nationally significant venues.

All events are governed by a detailed contractual and operational framework, ensuring that clients, guests and suppliers comply with all requirements, including noise controls, curfews and behavioural expectations.

The estate always retains full operational control and could intervene, manage or, if necessary, cease any activity that does not comply with these requirements.

## 13. MISCELLANEOUS

- a) We would like to clarify that Benham Park Enterprises Limited has not been involved nor had any ownership or operational connection with Kirtlington Park. The operation of Benham Park is entirely separate and should be considered solely on its own merits.
- b) Following the recent Q&A session with residents, the Estate's property management company has been in contact with a resident regarding the rear exit gate at Benham Park. For clarity, there is no access road connecting the manor house to this gate.

The gate is currently open as the previous electrical connection, which was routed via the neighbouring property, is no longer in place following a change of ownership. The management team is exploring a suitable and sensitive solution to reinstate power and ensure that the gate can be appropriately secured. In the interim, this access point is not used for event ingress or egress and does not form part of the event access strategy.

## 14. PROPOSED CONDITIONS

- a. We have stipulated within our premises licence application that fireworks and pyrotechnics will not be permitted at any licensable events. We would be pleased to extend this restriction to include bird releases, Chinese lanterns and helium or air-filled balloons.
- b. The number of guests attending any licensable event will be capped at 250.

- c. Licensable events would be limited to no more than twenty in the first year of operation, with a maximum of thirty-five in all subsequent years.
- d. Fencing will be installed between the manor house and the ha-ha before the first licensable event takes place and two life buoys will be positioned by the lake.

## 15. CONCLUSION

In summary, the application proposes a limited, professionally operated use of the estate, underpinned by detailed operational plans and ongoing engagement with the relevant authorities.

We fully recognise the sensitivity of the setting and the importance of preserving the character of the area. Our approach has therefore been to design an operating model that is proportionate, controlled and respectful of its surroundings.

We remain committed to maintaining open and constructive dialogue with both local residents and the Licensing Authority as the estate begins to operate.

Having carefully considered all representations, and having engaged constructively with the relevant authorities, we respectfully submit that the application demonstrably promotes, and does not undermine, the four licensing objectives:

- i. The prevention of crime and disorder
- ii. Public safety
- iii. The prevention of public nuisance
- iv. The protection of children from harm

In the absence of evidence to the contrary, we therefore submit that there are no reasonable or evidential grounds for refusal.

Accordingly, we trust that the application will be granted.

Yours faithfully,

Mark Scholfield

**Director, Benham Park Enterprises Limited**