



**Brighton & Hove
City Council**

**LICENSING PANEL (LICENSING ACT
2003 FUNCTIONS)
ADDENDUM**

10.00AM, MONDAY, 25 MARCH 2019

HTH ROOM G90

ADDENDUM

ITEM		Page
81	KEMPTOWN CARNIVAL 2019 LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS) POLICE WITHDRAWAL LETTER	5 - 8



Sussex Police
Serving Sussex

www.sussex.police.uk

Brighton & Hove Licensing Unit

Police Station
John Street
Brighton
BN2 0LA

Tel: 101 ext 550828

Email: brighton.licensing@sussex.pnn.police.uk

19th March 2019

The Licensing Technical Support Officers
Environmental Health, Brighton & Hove City Council
Bartholomew House, Bartholomew Square
Brighton, East Sussex
BN1 1JP

Dear Becky Pratley,

RE: TIME LIMITED LICENCE APPLICATION FOR KEMPTOWN CARNIVAL, BRIGHTON, EAST SUSSEX UNDER THE LICENSING ACT 2003. 1445/3/2019/00481/LAPREN.

As you're aware, Sussex Police had a number of concerns in regards to the above time limited licence application for this year's Kemptown Carnival. Unfortunately, during the 28 day consultation period, we were unable to have our concerns addressed. Due to this we submitted a representation against the granting of this licence based on the licensing objectives of prevention of crime & disorder, public safety and protection of children from harm which we believed could be undermined.

Since our submission, we have continued consulting with the applicant. Following a number of meetings, amendments have made to the Event Management Plan which Sussex Police feel addresses the concerns we had and that the event is now in a much better organised position.

Within our representation we raised the following points – I have included in *italic*, what has been amended and or put in place to address these concerns:

- The footprint of the event is far bigger when comparing it to the fully fenced in Pride Village Party. Sussex Police are not convinced the event organiser's will be able to exercise any degree of control over it.

Increased SIA security and stewarding has been put in place. This includes SIA on all entry points, bars as well as mobile on foot within the licensed area. A full security and stewarding plan issued as well as a safeguarding policy that addressed concerns regarding lost children and dealing with vulnerable persons.

Sussex Police Headquarters
Malling House, Church Lane, Lewes, E. Sussex, BN7 2DZ

Telephone: 101 | 01273 470101

Email: brighton.licensing@sussex.pnn.police.uk

- No satisfactory process is in place to deal with lost children and vulnerable persons.

Safeguarding policy issued that addressed concerns regarding lost children and dealing with vulnerable persons. They have enlisted the services of TTK Welfare, see appendix R, who specialise in child & youth protection at festivals.

- Policy has not been submitted detailing if the provided entertainment/acts will be appropriate for children and if not, how this will be managed.

Organiser's have confirmed that this is very much a family event and as such, all entertainment takes this in to account and is appropriate for all ages.

- There is an insufficient emergency "blue" route plan – this is a significant issue for the Police.

Detailed plan has now been submitted confirming all "blue" routes in to the event footprint. See appendix A. Blue routes shown as blue arrows pointing to the appropriate entry points.

- There is no intention to conduct searches on entry to the event despite making reference to the possibilities of prohibited items being carried in. This would enable drugs and weapons being freely brought into the footprint.

A new search policy has been adopted which will see dynamic risk assessed searching taking place at entry points and within the footprint of the event. Procedures are also in place in regards to drugs and weapons. See appendix C.

- The evacuations procedure to move potentially thousands of people over the A259 Marine Parade route has not been fully thought out. This is a fast road and could result in injury to persons crossing it in what could be a panic situation.

A new evacuation procedure in place which has removed our concerns over large number of persons being directed across the A2589. See appendix C.

- The policy concerning the removal of people from the event will not stop re-entrance from one of the many surrounding roads and alternative entrances, and does not address how this will be managed.

All entry points are managed and staff issued with radios. Should a person be ejected this will be shared with all appropriate staff with details of the person and description to assist in reducing the risk of re admittance. See appendix C.

- Outside bars at this time are not providing provisions to offer free drinking water. They are relying on surrounding premises, including private homes to provide. We do not feel this would meet the mandatory conditions under a premises licence.

Updated Bar Management Plan now confirms that all bars will have provisions in place to be able to offer free drinking water. See appendix I.

- It has not been confirmed if the sale of alcohol will be by on-sale only, or by both on and off-sales. If on-sales only, there is no policy concerning how this will be monitored with no search policy to ensure people are not leaving the area with alcohol.

This has now been confirmed as On & Off Sales. It has been agreed between the Event organiser's, BHCC and Sussex Police, that operating as On Sales only would not be practical in such an open environment.

- There is no policy concerning persons entering the event with large amounts of alcohol.

This has been addressed within the search policy.

Within our representation we submitted a number of conditions to be considered at the hearing. As we are officially withdrawing our representation against this application, we no longer need to canvas these. Comparing what has been offered under section M of the application and within the submission of the Event Management Plans, we feel we have all the conditions covered.

We continue to work with the applicant and the organiser's of the event and this will be the case right up to and including during festival itself. Our overall concerns though have been addressed and Sussex Police feel the event is in a much better position with plans in place which promote the licensing objectives.

To this end, Sussex Police would like to withdrawal our representation and can confirm, we will not be attending the hearing on 25th March 2019.

Yours sincerely,

Mark Thorogood
Licensing Officer
Sussex Police

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

