

# APPENDIX C

**Stone, Derek**

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**From:** enquiries [REDACTED]  
**Sent:** 13 August  
**To:** Robson, Debra  
**Subject:** Objection to licensing application 20/023/LAPREM, Old Pier Hut, South Parade Pier

## Objection to licensing application 20/02308/LAPREM, Old Pier Hut, South Parade Pier

Dear Debra

I Dawn Sait the manager of the Ocean Apartments am acting on behalf of the residents who live in Flats 2A ,2B, 3, 4, 5, 6, 7, 8, 9, 10, 102, 103 and 303 at the Ocean Apartments 8 – 10 St Helens Parade, Southsea and a local resident who lives nearby who wish to put on record by objections to the above licensing application.

The proposal is for a kiosk selling alcohol daily until 11pm. I contend that this will have a negative impact on the nearby area, particularly when considered in conjunction with the area of beach decking granted planning consent in 2018. The Hope and Glory Public House vs Westminster case clarifies that licensing authorities can and should consider the direct and indirect impact of applications. The City Council should use that to refuse this scheme.

The application breaches all four licensing objectives and would impose external disbenefits on the neighbouring area. Specifically:

### The prevention of public nuisance

When and how the planning consent to install decking on the pier will be implemented is unclear. The whole of the beach will be altered by the flood defence works and we assume that is why nothing has happened on the ground as yet. However the committee should take it into account when arriving at its decision.

It is obvious what this means. The proposed unit will sell alcohol to people who then sit on the decking consuming it. This then would mean noise from drinkers until 11pm every night – and this on the only stretch of seafront where people actually live. Even long established pub gardens are required to close by 10pm and yet here we have a proposal that would result in completely unmitigated noise and light pollution until late into the night. As all sales would be off-sales, any restrictions the council may want to include on the lease for the decking would not be linked to the licence and would therefore be effectively unenforceable. There are no parallels elsewhere in the city and it would be an outrage if allowed. The licence that was granted to the pier to sell alcohol in the bars inside the pier had restrictions on this licence to ensure that the drinking took place inside and that no drinking was allowed on the outside areas that could cause noise or a public nuisance.

### The prevention of crime and disorder

Evening drinking venues normally come complete with a raft of anti-crime measures including CCTV and door staff at busy times. As the decking area is outside the red line of the application, limits on how alcohol is consumed off site cannot be imposed. Without the standard anti-crime measures being available, there would be nothing to limit fights and the other anti-social behaviour linked to heavy drinking.

### Public safety

The pier is not well lit and nothing is known about how the decking area will be illuminated. The potential for accidents after dark is considerable. If any glass bottles or glasses are sold then there is also the potential for glass, whether whole or broken, to spread over the beach. That would present a severe danger.

### The protection of children from harm

There are no other unenclosed decking areas for drinking in the city. The potential for children walking along the seafront to be exposed to strong language and expletives are obvious. It is also not reasonable for young children in particular to have to witness drinking. This licensing application will enable that. Its whole purpose is to sell alcohol to be consumed in public on the beach or on the decking area. Is that really the image we want to create for our seafront?

### **Summary**

The stretch of seafront by the pier is the only one where people live and is one where large numbers of people walk by. This application is for the off-sale of alcohol. It will not attract trade from local residents, who would be far more likely to use the Coop store. The real intention then is to sell drinks to be consumed on the planned decking area and on the beach. While beach drinking is not illegal, it is also not to be encouraged. The council has an objective of creating some nice venues for people to enjoy the seafront at. Beach drinking would not fit with that.

The Hope and Glory case clarifies that licensing authorities can take account whether the likely impact of an application is proportionate to its benefits. I would contend in this case, the impact would be excessive and I ask that you refuse it.

Kind regards

Dawn Sait

For and on behalf of residents at:-

**Ocean Apartments**

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