

## APPENDIX D

PC Peter Rackham  
Core 5 LFG  
Civic Offices  
Portsmouth  
PO1 2AL

Mr John Henry Thurston  
Billy Manning Limited  
Clarence Pier  
Southsea  
Hants  
PO5 3AA

3<sup>rd</sup> September 2020

### **Response to Objections to TEN for 3 Periods 9<sup>th</sup> – 31<sup>st</sup> October 2020**

Dear PC Rackham,

I write to you in response to your objections received by email via Derek Stone of PCC on 1<sup>st</sup> September 2020. I am writing in my capacity as Events Director for Clarence Pier (Billy Manning Limited) and as well as the Managing Director of Blackstar Live LTD (Event Production Specialists). I write on behalf of the applicant and Personal Licence holder Mrs J Norman.

To add background: I am an experienced Event Director, with over 15 years of experience delivering safe and successful events, of all types and scales, indoor and outdoor, and all involving the retail sale of alcohol in a variety of legislative jurisdictions. Notable involvements include infrastructure design at Hyde Park Winter Wonderland 2011 - 2013, Event Direction for The Grosvenor House Hotel, Park Lane London on numerous occasions. The London Cabaret Club; Head of Event Production 2018 – 2020. I have been the Managing Director of Blackstar Live LTD since 2011 and preside over the design, planning, production and operation of over 75 projects per year, which are patronised by an estimated 750,000 guests and visitors. I have an impeccable record of compliance, safety and event delivery. I can provide examples and references should this be required

I am grateful for your statement of objections which has highlighted a number of areas which deserve greater clarification, explanation and review in some cases. This is a vital part of the event design process which leads to well-run events. Thank you.

From initial review of your objections, which are largely understandable, particularly from a better-safe-than-sorry point of view, it would seem that we have given the appearance of a large-scale drinking event, which is not the truthful reality. In fact, we seek only to add a small, family-based offering of alcohol, authentic German food, a friendly and safe atmosphere to the largely family visitors that we welcome here at Clarence Pier. A place for Mum's and Dad's to sit and to enjoy a different-to-usual atmosphere which pays tasteful homage to the

largest folk festival in the world; Oktoberfest, whilst younger members of the family enjoy the rides and attractions on the pier.

I will also formally address your concerns in the paragraph order in which they have been written in the free-text section of your document, in the absence of any numbering system.

Paragraph 1: (*Hours, Dates*)

Yes, the clarification of times and dates is correct. We have decided to reduce the capacity for the large indoor and outdoor seating areas to a maximum of 75 persons, a reduction of 424 from the original (erroneous) entry of 499. There is also no intention to perform live music. Pre-recorded only.

Paragraph 2: (*Oktoberfest...*)

We will market this event as 'Family Oktoberfest'. We will limit the purchase of alcohol to 4 x Pints of beer per person by way of a token-system issued on entry. We will not have live entertainment, or a DJ.

Paragraph 3: (*A number of issues...*)

- As attendees will not be permitted to consume more than 4 Pints of Lager, we do not believe that the area will see increased drunken-ness.
- As attendees will not be permitted to consume more than 4 Pints of Lager, we do not believe that the area will see increased violence which is related to alcohol.
- As attended will not be permitted to consume more than 4 Pints of Lager we do not believe that there will be an increase in vulnerability.
- As there is no live entertainment, no drinking games and no encouragement to do so, we do not believe that there will be any dancing, nor singing in the area.

Paragraph 4 & 5: (*Unclear areas...*)

- The applicant will limit the quantity of alcohol consumable by way of issuing a 4-token system on entry to each adult visitor. Once all 4 tokens have been spent the visitor will not be permitted to purchase any further alcohol. From our experience of successfully running similar family-events, most adults will only consume 1 or 2 pints of Lager. No unaccompanied children will be permitted in the seating areas, and a challenge-25 policy will be used and photographic ID will be required for age verification.
- We will employ the services of 2 x SIA Registered Door Supervisors at all times that the premises are open and the licence is in effect. These persons will be present to discourage any bad behaviour, to reinforce staff carrying out age and ID checking, and to prevent public disorder.

- SIA Door Supervisors in connection with the 4-Pint limit will disallow any person to over-consume alcohol. This will also reduce the likelihood of any violent behaviour. In the event that any person does become violent through alcohol consumption or otherwise, they will be escorted from the premises by the SIA Door Supervisors and will be encouraged to leave the area without causing any further disturbance.
- Now that the capacity of both the indoor and outdoor seating areas combined has been reduced to a maximum of 75 persons, this in conjunction with a one-way system enforced by hanging signage, floor markings, social-distancing reminder signage and verbal staff instructions will ensure that social distancing is maintained at all times. Furthermore, staff and Door Supervisors can remind and enforce social distancing rules should this become necessary.
- Clarence Pier has a large team of trained first-aiders, including the applicant herself: Mrs J Norman. At least 2 members of the team will be present on site whilst the event is in operation to ensure that any person taken unwell is adequately cared for. Tap water will be available and provided free-of-charge to any person that requests it.
- Further to the paragraph above the previous paragraph; a strict one-way system will be in operation, enforced by hanging signage, floor markings, social-distancing reminder signage and verbal staff instructions in addition to a separate entrance and exit door to ensure socially distanced access and egress.

Paragraph 6: *(Attracting many people...)*

- We believe that with the reduced capacity of 75 persons maximum, a strict 4-Pint Limit, and the ability to pre-purchase tickets with restricted numbers, that this event will in fact NOT attract large numbers of visitors. It will be marketed only locally, to a family demographic and as an additional activity to undertake whilst visiting the family-oriented rides and attractions at Clarence Pier. I (John Henry Thurston as the Event Director in conjunction with Mrs Jill Norman as the Managing Director) with am well placed and thoroughly experienced in the safe, successful and compliant delivery of Events. We are supported by an excellent, professional management team.

I hope that the above has gone all the way to assuring you that we seek only to operate a well-run, small scale family augmentation to the existing attractions here at Clarence Pier. We welcome any interested stakeholders to an on-site meeting to look over additional plans in more detail over a cup of tea should this be desirable. If there is any further documentation or clarification required then I am more than happy to provide this upon request.

With reference to the final paragraph on Police recommendations which reads:

*“The police also remind the reader that a TEN is not subject to any conditions which would ordinarily be placed on a premises licence ... As such there is nothing which a committee can place onto a TEN to hold the Operators accountable.”*

I would like to respond directly; In the absence of any instrument that a committee could place onto the TEN, there are two further items which are implied to be attached to any business activity carried on by myself or my colleagues; the first is past performance; we have excellent records of good and reputable business conduct, and I have an immaculate record of safe event delivery. The second is reputation of trustworthiness. If we say we are going to implement measures, we will implement them; irrespective of whether we can be held accountable for having implemented them or not. This is simply honest and good conduct, and it is who we are, as individuals, as business operators, and as long-standing members of our local community.

In light of the above, I would ask Hampshire Constabulary to reconsider their objection in its present form.

Sincerely,

John Henry Thurston  
Event Director – Clarence Pier & Blackstar Live LTD.

On behalf of

Mrs J Norman  
Managing Director  
Billy Manning Limited – Clarence Pier.