

GOSSCHALKS

BY EMAIL ONLY
Licensing Section
Portsmouth City Council

Please ask for: Richard Taylor
Direct Tel: [REDACTED]
Email: [REDACTED]
Our ref: RJT / MJM / 098454.27379
#GS4025383
Your ref:
Date: 05 August 2021

Dear Sirs,

Re: **Licensing Act 2003 – Review Proceedings**
Duke of Devonshire, 119 Albert Road, Southsea PO5 2SQ

We act on behalf of Ei Group Ltd. Our client is the freehold owner of these premises and we have received a copy of the application for expedited review of the premises licence issued on behalf of Hampshire Constabulary under Section 53A of the Licensing Act 2003.

We would be grateful if you would accept this letter as a formal representation on behalf of Ei Group Ltd to the review which is automatically triggered by the application made.

Ei Group Ltd owns around 4000 public houses in England and Wales. The vast majority of these premises are the subject of lease/tenancy agreements through which the tenant operates his/her/its own business out of our client's premises. The lease/tenancy agreement makes it clear that all operational responsibility for the premises lies with the tenant. The Duke of Devonshire is the subject of a 5 year tenancy agreement in favour of Mr S Yaman, the premises licence holder. Mr Yaman has been operating these premises since November 2018.

Please note we take a wholly neutral stance with regards to the allegations made given that our client has no operational responsibility for the operation of the premises.

Having read the application for review and following the conversation that our client has had with A/PS Rackham, it is clear that the cause of the review is poor management practices and staff training. Our representation is that a proportionate response to the review would be the imposition of conditions requiring the operation of door supervisors on a Friday and Saturday night, staff training (to include training on sales to persons who are drunk, the age verification scheme operated, conflict management and sexual exploitation) and possibly a period of suspension to enable the operators to implement the conditions.

We would be grateful if you could acknowledge receipt of this representation and advise as to the date of the hearing as our client may require us to attend to expand upon this representation.

We look forward to hearing from you.

Yours faithfully,



GOSSCHALKS LLP