

Appendix 4b

M Squared Services Ltd.



6 April 2023

Prepared on behalf of;

Merlin Entertainments Ltd, Tourism Business Improvement District and the Beach House Restaurant

Representation Against New Premises Licence

Applicant Details- VW Music Ltd

Premises – Promenade and Town Centre

Event- Blackpool Festival (Pier Jam)

We are concerned about the 3 Licensing Objectives highlighted. The primary basis of the concerns comes about due to the location, date, demographic and capacity of the event.

Prevention of Crime and Disorder

We note from the operating schedule under condition 2 that the upper limit that the Licence Holder is prepared to accept is 9999 people. We feel this number of people both travelling to and from the site will have a significant impact on the promenade businesses. The customers will have to make their way on foot from hotels, car parks, and travel hubs such as the train station. The visual impact of such large groups can itself be a worry for young families already visiting attractions in the area and the lack of coordination regarding arrivals seems to be a huge gap that has not been considered.

We note that the matter will be subject to approval from the Safety Advisory Group and Blackpool is well accustomed to holding large events but switch-on events and firework events which see similar numbers are very much self-policing. The demographic that will be attracted to this event is at a much higher risk and will likely already be intoxicated on arrival and if not certainly on dispersal. The music style on offer is synonymous with illegal drug use and the sheer volume of customers involved takes what would normally be manageable risks to a level that we believe will be uncontrollable.

By way of reference points, numerous events can be looked at as precedents. The events held at the Piers are similar in style but very different in terms of capacity, usually opting for customer numbers of circa 3000. There is usually a notable impact from the Pier events, but the management regime has largely designed out a lot of the issues which ironically come

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about from people coming and going from the event mid-way through and dispersing from the event to leave to attend after parties at nearby premises. The numbers proposed for this event are magnified to the power of 3. The location is much broader and does not lend itself to controlled dispersal down one street. Customers can leave there via a myriad of different streets and very quickly overrun the promenade and town centre.

The operating schedule is silent regarding the issue of containment or readmissions, large numbers of people exiting the premises mid-way through the event will be problematic. The Licence Holder is unable to keep people on site from start to finish but by way of deterring large numbers of people from coming in and out, a condition should be imposed that no readmissions will be allowed. This may be considered at a SAG but it should be as a minimum inserted as a condition on the premises licence (if granted)

The Applicant offers up a town centre resource as a means of preventing crime and disorder which is the Town Centre CCTV, listed as item 9 on the operating schedule. This is a resource that this Applicant has no autonomy or control over, it is there to safeguard the residents and visitors of Blackpool and is a publicly funded resource. We accept that the event organisers will be installing CCTV inside the premises but 10,000 higher-risk customers attending an event of this kind will require significant control and monitoring when they arrive and leave. We believe it is unfair to offer a public resource for a private event.

The location sits just outside the town center cumulative impact area. It is a matter of 50 meters on the right side of the line. This fact may be advantageous to the applicant but to businesses already operating in this area having a licence granted of this magnitude and this number of people in the area brings into play all the issues mentioned in paragraph 14.2 of the Section 182 Guidance shown below.

14.21 In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport..

This application, if granted, will put not just large numbers of drinkers in the area but an extraordinary number of drinkers in an area that is on the outer edge of what is already considered the stress area.

Prevention of Public Nuisance

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The issues of nuisance largely duplicate the matters raised in the crime and disorder objective, our primary concern is the behaviour of customers travelling to and from the event. We understand the position set out in Sec 182 Guidance regarding the behaviour of individuals when away from the premises is a matter of personal responsibility which is detailed below.

2.21 Beyond the immediate area surrounding the premises, these are matters for the personal responsibility of individuals under the law. An individual who engages in anti-social behaviour is accountable in their own right. However, it would be perfectly reasonable for a licensing authority to impose a condition, following relevant representations, that requires the licence holder or club to place signs at the exits from the building encouraging patrons to be quiet until they leave the area, or that, if they wish to smoke, to do so at designated places on the premises instead of outside, and to respect the rights of people living nearby to a peaceful night.

This paragraph of the Guidance is clearly not aimed at large-scale events, the mischief it seeks to address is the right of residents to enjoy the quiet possession of their properties suggesting that signage will be the “silver bullet”.

In conventional premises, one can see how this may have some effect, among other measures the Applicant has offered up signage as a means of deterring nuisance. With the volume of people all leaving at the same time, it is simply not credible that people will see any signs let alone take any notice of them and the dispersal arrangement contained in the application appears to be basic at best.

Protection of Children from Harm

We have focused on the deficiencies within the operating schedule.

Standard proposals for challenge 25 and vetting on the door are offered up but there are no proposals contained regarding what the Applicant will do when a young person is refused admission. By the nature of the event, there will be young people who attend in groups who could become separated or not have a means of getting home or returning to the accommodation. Who will pick up the issues that could flow from large numbers of young people being refused admission? Will this be something that publicly funded services will need to pick up? The Operating Schedule does not cover such scenarios which will be highly likely.

The standard of fraudulent Identification is of a much higher specification today, very often not detectable by visual inspection. The likely demographic will be people in their late teens or early 20s. It is inevitable that many people under 18 will obtain tickets. We feel the age verification policy is not strong enough for an event of this style and size.

The impact on children already in the area visiting attractions is something that again has been overlooked, this will be particularly relevant during the arrival stage of the event. The promenade by definition is a shared space for families and visitors. Events of this type are usually coordinated with

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care with buy-in from all the Authorities.

We are seasoned operators and welcome events to the town, but the size, location and customer demographic are at odds with what many of the Promenade businesses have been seeking to achieve for the last 2 decades.

In the previous 12 months, Merlin has spent 2 million pounds marketing Blackpool as a family resort and the timing, entertainment style and proposed capacity of this event undermines our collective efforts not to mention poses a serious threat to the 3 Licensing Objectives detailed in this submission.

Prepared by

Mark Marshall FCILEX
Director

A handwritten signature in black ink, appearing to read "M. Marshall".

6th April 2023