

I have read through the consultation document and am amazed that this is being taken seriously at the numbers proposed. I cannot make the next meeting on the 20th as I'm away but here are some thoughts.

Would it not be easier to limit this to 500, as suggested by ACPO and not 5000 as proposed. This would mean that the small local events would not need apply for a licence. This would cover the non commercial and community events which seem to be highlighted within the document. However it would still mean that a licence (and potentially conditions which are enforceable) would be required for anything over this amount. It is not good enough to state that existing legislation in other forms will deal with any risks from deregulation. A commercial building with no alcohol or late night refreshment would have the ability to become a dance led venue with no regulation at all. If they bring their own alcohol where do we stand ??

With paragraph 2.25 (page 11) if a venue has existing conditions on the licence which directly apply to formerly regulated entertainment then how can they leave them on as they will potentially make any of the deregulated entertainment illegal - such as advance notice of events.

A lot seems to be made of adopting a common sense approach. Who decides what that is and what special interest groups are involved in this ?? I am all for making legislation as simple as possible but this is a bad idea. With having most forms of regulated entertainment require a licence we are currently up to date with most of the events which take place. The larger events tend to be well managed and there are planning meetings between interested parties in advance of the event itself. This deals with issues around public safety, traffic management, security, drugs etc etc. By adopting a stance of anything under 5000 is fine we are running the risk of becoming aware of events far too late to deal effectively with them if badly run or organised.

A common thread for me was paragraph 2.26 (page 11) as by limiting numbers to under 500 and for non commercial and community events this would still catch most of the 13400 premises which would no longer be subject to a licensing regime.

Paragraph 4.8 (page 21) seems to ignore that by deregulating unamplified music due to natural acoustic reach all we would potentially do would be to cram more people closer together to hear the music. This could easily and very quickly lead to crowd density issues. With this event being unlicensed there would be no safeguards in place potentially.

Paragraph 3.37 (page 18) should be something that is in place already. Best practice should always be in place and at least considered.

I feel that a lot of these areas of currently regulated entertainment could be amended. My personal view is that any deregulation should be for a maximum number of 499 (as per TEN's) and certainly not 4999 as proposed. We could make it far easier for places like schools and community events to run fund raising events which do not require the current licence, thus maximising any revenue they make.

I don't see a problem with deregulating performance of film subject to BBFC classification and would like to see martial arts and cage fighting added to boxing/wrestling requirements.

These are just some thoughts off the back of reading the consultation document. By having the need for a licence in place we demand a buy in from venues and will promote best practice and risk considerations. By deregulating we run the risk of allowing all manner of events to take place with little or no consultation. There will be no interest in running a safe event as the licence (which can be reviewed) is no longer in place. If we had a big problem following deregulation what enforcement action could we in all reality take against some non licensed premises or unscrupulous operators.

A nightmare scenario for us would be as follows:

The Hippodrome in the middle of Brighton has no licence currently as the old one was surrendered. The capacity is well over 2000. Theoretically someone could open the doors, not bother to apply for an alcohol or late night refreshment licence and host dance led events with recorded music all night if they wanted with no need for a licence or contact with any interested party. Yes we would have out of hours noise and other potential avenues of enforcement, however we would have no conditions at all to try and minimise the impact upon the local community beforehand. With no alcohol licence where is the threat of review ?? We have a city centre venue with no parking, dispersal policy, lack of nearby late

night refreshment, no nearby taxi rank etc. The impact not only from an unlicensed venue but also when the customers leave in what is a built up and residential area would be immense. It would potentially undermine CIZ as well as a venue could open without the need for a licence whilst still holding events which have a marked impact on the area.

If I have any other burning issues I will let you know.

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