



**Kent
Police**

Chief Officer of Police Representation in relation to an application for grant of premises licence made under Part 3 Section 17 Licensing Act 2003 (S18 Licensing Act 2003)

Details of person making objection

Name of Chief Officer of Police	Acting Chief Inspector Ian Swallow
Postal Address: (Area Headquarters)	Margate Police Station Fort Hill Margate Kent CT91HL
E-mail	licensing.east.division@kent.police.uk
Telephone Number:	01227 868414

Details of premises representation is about

Name of Premises:	Dreamland
Address	49 Marine Terrace Margate Kent CT91XJ
Date application received by Police	05/12/2022
Date representation sent to Licensing Authority	22/12/2022 must be within 28 days of receipt – The Licensing Act 2003 (Premises Licences and Club Premises Certificates) Regulations 2005. Part 4 Reg. 22.

Prevention of crime and disorder	X
Public Safety	X
Prevention of public nuisance	X
Protection of children from harm	X

Is this a representation regarding the Designation of Premises Supervisor under S18 (9) Licensing Act 2003? YES/NO

If yes, complete the following statement: - The relevant representation within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(9) of that Act and are as follows:

Due to the exceptional circumstances of this case, I am satisfied that the designation of the person concerned as the premises supervisor under the premises licence would undermine the crime prevention objective because

Please use separate sheets where necessary

The relevant representations within the meaning of S.18(6) of the Licensing Act satisfy the requirements of S.18(7) of that Act and are as follows:

Please give the reason for the representation and detail the evidence supporting it:

At this stage the Police are unable to support this application as submitted. In its current state the application lacks key areas of detail for the Police to make an informed decision on the application nor has there been adequate time to negotiate or correspond with the applicant given its complexity, within the timelines set by the 2003 Licensing Act (28 days) It is therefore felt the application as is does not show adequate regard to the licensing objectives.

The police received an application for a new premises licence for Dreamland 49 Marine Terrace Margate Kent 5th December 2022. If granted as applied, this premises would operate as an Events and Theme Park & Amusement buildings and Function rooms, authorised to conduct the following licenced activities:

- Provision of regulated entertainment including plays, films, boxing or wrestling, indoor sporting events live music, recorded music, performance of dance and Anything of a similar description to live music, recorded music, or performance of dance Monday to Sunday 09:00 — 04:00 hours daily.
- Late Night refreshments Monday to Sunday 23:00 — 04:00 hours daily.
- Supply of alcohol both on and off the premises Monday to Sunday 09:00 — 04:00 hours daily.

The police would request that the trading hours for all licensable activities be reduced to 09:00 — 02:00 and closed to the public at 02:30 as stated on the existing premises licence for the buildings and transit area and the outdoor areas closed by 23:00.

The application requests the maximum permitted numbers at any one time would be restricted to 19,999 persons. However, the application does not give figures for the number of people permitted in each area of the complex. There are currently restrictions on the Hall by the Sea capacity 1200, Ballroom capacity 600 and the Roller Disco capacity 500.

Dreamland is a traditional seaside funfair, amusement and entertainment centre located in Margate, from 1920's. Dreamland is set behind seafront properties, mainly commercial to the north and surrounded on the east, west and south by heavily populated residential properties that have developed over the years, with some to the south being erected very recently. The area of Dreamland is within Hall by the Sea Rd, Tivoli Park Rd, Tivoli Rd, Eaton Rd and Belgrave Rd. Entrances to the complex are via Hall by the Sea Rd and the Belgrave car park.

Dreamland was at its peak during the 1950's to early 1970's, The site was left to decay for a good number of years. In 2014 it was confirmed that the site would be redeveloped. Original applications received by Kent police 24/12/2014, approved by Thanet Licensing committee 22/04/2015 for both the Event space and theme Park as one premises licence and Buildings and Transit area on a separate premises licence. Both premises licenses being varied in March 2016 and approved. Copies of these premises' licenses are currently live and will be attached to the police submission for clarification, if required.

Attached to this application the applicants (Sands Heritage Ltd have described the steps they intend to take to promote the four licensing objectives).

1. The prevention of crime and disorder
2. Public Safety
3. The prevention of public nuisance
4. The protection of children from harm.

The applicant has offered up a total of 30 proposed steps that they feel are necessary to promote the licensing objectives, many of which refer specifically to the event space and theme park. Despite the information contained within, clarification is still sought for many of these steps and at this stage Kent Police are unable to support this application.

If granted the premises licence would allow for up to 19,999 persons on the entire complex from 09:00 — 04:00 hours each day with 48 events in a calendar year. Events comprising of four or more consecutive days should not occur for more than 4 occasions in a calendar year. The application did enclose a plan of the site, but the police feel this was not comprehensive enough, or to a scale to show the site and the specific function of suites and location of exits and entrances clear enough.

The police would request a copy of the location of all CCTV cameras as part of the application. A clear plan of all exits and entrances and function suites, including areas set aside for the sale and consumption of alcohol would also be requested.

The following points need clarification by the applicant.

- 1) Off sales between the buildings and the theme park and event space. Nothing to be allowed within the theme park.
- 2) Clarification required for the location of all CCTV cameras and agreed CCTV conditions.
- 3) Where copies of the premises licence are to be displayed (Copies should be displayed where licensable activities are taking place example Ballroom, Roller Disco, Hall by the Sea, Each of the bars in the food area Theme Park (Entrance) Event space (Entrance) and the Exits / Entrances to the complex.
- 4) How is the applicant going to monitor entrances and exits to stop alcohol being brought in, or being taken from the site by service users?
- 5) Is suitable training being documented?
- 6) Are the refusal book/ Incident logs maintained and signed off each day by the DPS or personal licence holder on duty?
- 7) Confirmation of lists of staff authorised to sell alcohol is to be displayed on each bar.
- 8) Confirmation that all drinks purchased and consumed in the buildings are to be served in government approved non glass vessels.
- 9) Ratio for SIA door staff and agreeable achievable numbers for SIA wearing Body Worn Video during their duty time.
- 10) Confirmation that no licensable activities are allowed in the Arcade and Octopus Garden.
- 11) When not in use, confirmation that the Ballroom is to be securely locked.
- 12) Drugs policy needs to be updated to include new Psychoactive Substances legislation (Psychoactive Substances Act 2016).
- 13) Confirmation of drug seizure policy and further confirmation that any drugs seized being placed in a secure drug box and the police informed for collection by officers.

Road closures and associated concerns

The applicant has stated that on large events they would be putting road closures in to assist with the dispersal of patrons and will be manned by their staff in the surrounding roads of Eaton Road, Belgrave Road, and Marine Terrace. This may cause congestion around the residential areas and restrict movement for residents and tourism traffic. Taxis and coaches will be further restricted in availability, adding to the issue. The area has very limited car parking available, with the Venue not holding enough on-site parking to accommodate the newly increased numbers. The granting of this license as written will further impact resident's access to parking during Events, and increase issues around traffic congestion and safety concerns.

SIA and stewarding

The police would wish to see a breakdown of proposed SIA and stewarding for each event and detailed within the EMP. Or an agreed number Of SIA Door Staff and stewards for any event.

CCTV

Further clarification is sought with regards to the proposed use of CCTV around the site, be that the locations of fixed CCTV cameras, the availability of the CCTV being provided to both police and other authorised persons, the use of body worn cameras etc. CCTV will provide best evidence with regards to incidents and evidence capture, as well as being a significant crime prevention. it would be imperative that best use is made of CCTV.

Police presence on site

Legal opinion suggests that the responsibility for public safety rests with the organisers of an event, the owners of the land on which it takes place and the local authority if the event takes place on the road. However, other persons or agencies who undertake actions regarding public safety at an event may assume a duty of care and, therefore, also become responsible. In the past the police service has taken the lead and undertaken actions to facilitate public events, acting for what they believed to be the public good. However, a more focused approach, confining police action to those issues which are part of our core responsibilities or where there is legal authority, must be adopted.

The responsibility for public safety rests with the organisers of an event and the owner of the land on which it takes place. Special Police Services is the provision by the police of an additional special service i.e. beyond that which the police would consider necessary to meet their public duty obligations, and which is provided at the request of organising bodies of certain events and for which the organising body must pay.

The event organiser should be informing the police of any concerns they have but their event management plan should not include reference to use of police resources in any other capacity.

Environmental Impact

Whilst local authority environmental health officers are best placed to provide expert knowledge and opinion in this area, Kent Police are concerned that any event has the potential to impact the local residential community either as a noise nuisance or impacting those living in the immediate area surrounding Dreamland through traffic disruption, Anti-Social Behaviour or Public Disorder. The License as requested does not provide sufficient information to allay the concerns of the District Police establishment.

Previous Events and Evidence

The police have been made aware and attended for disorder during two large Music Events in 2022; Rudimental and Craig David.

If this application goes to a hearing, The police will provide information and the attending Officers in person to give an account of the incidents to the committee and applicant at a hearing if necessary.

Summary

To grant this application as requested would have detrimental effect on the residents and would have a serious impact on the Local Community and transport infrastructure. This will be particularly evident during the Peak Summer Season, where Tourism increases visitors to the District considerably. The lack of public transport to disperse people at the proposed closing time of 04:00 will leave the local area open to public disorder (the potential for twenty thousand people being ejected into a highly populated residential area, at such an unsociable hour, is above and beyond even the sum of late licence patrons across the rest of the District). People will be unable to find accommodation at such a time and may resort to the local beaches to sleep off the effects of the night before. The risk to life is considerable with these numbers potentially exposed to hostile environmental conditions. There will be a secondary impact on the Environment and further impact on the Council Operatives cleaning the beaches making them ready for the Tourist footfall on peak, or basic environmental considerations the next day. These considerations would have a major impact on Local Policing after any large scale event and would place the safety and security of the Local Public at a higher risk due to the resource intensive factors above.

Suggested conditions that could be added to the licence to remedy the representation or other suggestions the Licensing Sub Committee may take into account:

If the Licensing Committee grant this premises licence application, Kent Police would request the following conditions are added to the grant of a premises licence.

1. Hours reduced for the building and transit area to 09:00 — 02:30 & the event space and theme park 23:00. All licensable activities are to cease 30 minutes prior to the end of trading and open to the public.

2. Reduction of the length of events with no more than 4 events consisting of 4 days in any calendar year.
3. All events will be ticketed or pre-booked and all events must have an Event Management Plan attached to each event.
4. An Event Management Plan (EMP) must include Risk Assessments, Medical Plan, Security Plan, Dispersal Plan, Street closure orders, Fire & Rescue service agreed plan and terrorist plan.
5. All events of more than 5000 persons Will go to a Safety Advisory Group (SAG) at least 3 months prior to the event.
6. The internal areas (Buildings and Transit area) will at no time have the bars open during normal day to day hours.
7. All internal (apart from the Roller disco, meeting point hub and arcade) will not be open to the public
8. The Hall by the Sea, will only be used for licensable activities when it has been booked for a specific event (small events as advertised by Dreamland, wedding receptions, birthday parties, Drum and Bass, DJ events etc.) However, such events must be ticketed, or restricted access and not open to the public. Up to 2 x fixed and permanent bars allowed to open.
9. Ballroom, will only be used for licensable activities when it has been booked for a specific event (small events as advertised by Dreamland, wedding receptions, birthday parties, Drum and Bass, DJ events etc.) However, such events must be ticketed, or restricted access and not open to the public. Only 1 x pop up bar will be allowed.
10. Roller Disco area can only be used for licensable activities when it has been booked for a specific event (small events as advertised by Dreamland; Wedding Receptions, Birthday Parties, Drum and Bass, DJ events etc.) However, such events must be ticketed, or restricted access and not open to the public. There will be no bars selling alcohol to the public outside of any event.
11. If tickets are to be sold on the day of the event and / or on entry to an event, then SIA security will be assessed in an Event Management Plan as per a maximum capacity scenario.
12. If an after-show party is planned within the internal events area, from any Outdoor event, numbers must not exceed the capacity numbers set within the Event Management Plan.
13. CCTV shall be installed, working, and maintained with a thirty-day rollover recording. Recordings shall be made available to the police and licensing authority upon request if required. There shall be at least one member of staff present on duty during licensable events that can operate and download CCTV footage upon request. The licensed area shall be covered including the entrances and exits as a minimum. The system must be checked and working at the beginning of trading hours and checked at the end of trading. The DPS or person nominated by the Premises Licence Holder must sign in an appropriate logbook that the checks have been carried out. In the event of technical failure of the CCTV equipment the Premises Licence Holder or DPS must report the failure to the Police Licensing Officer within 24 hours unless the CCTV will be repaired and operational before that time, to licensing.east.division@kent.police.uk
14. Signage at all exits / entrances requesting patrons discard alcohol in the bins before entry / leaving and showing local PSPO warnings.
15. There will be 4 x SIA door staff on duty within the theme park and internal areas at any time during opening hours.
16. All SIA staff on duty during all events or otherwise, will be requested to use Body Worn Video. The achievable number of users will be included in the provided EMP for Events, or users highlighted on a recordable document available for Police review if needed.
17. The Theme Park will be closed during any event staged within the Outdoor Event Space.
18. When an event is being operated in the Outdoor Event Space. The Theme Park will close at least 3 hours prior to the Event starting to allow Security to complete a sweep for concealed drugs, alcohol and weapons prior to the event.
19. All training given to staff in relation to a) Prohibition of sales to persons who appear to be underage or drunk b) Refusal of service and recording of refusals either via till or written record, c) Understanding of the licensing conditions, d) Challenge 25. Must be Recorded and given to the police upon request.
20. There must be a drugs policy in place, updated to include the Psychoactive Substances Act 2016.

Signed:



Date: 22 \ 12 \ 2022

Print name: A / Chief Inspector Ian Swallow Force Number: 10012

pp. Chief Officer of Police for the Police Area in which the licensed premises are situated

Representation may be made at any time during the 28 consecutive days starting on the day after the day on which the application to which it relates was given to the authority by the applicant. Please return this form along with any additional sheets to the Licensing Authority. This form must be returned within the Statutory Period.

Kent Police : Area Operations Form No. 3480 rev Nov 2006 [rev 1/06] v2

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