

Wednesday 12th January 2011

Licensing Section
Environmental Health Dept
Royal Borough of Kingston
Guildhall
Kingston KT1 1EU

Dear Sir or Madam:

The Kingston Arena Premises Application

The Canbury and Riverside Association (CARA) covers an area of some 750 households whose boundary is 0.2 miles from the Kingston Arena and many of whose residents regularly pass the premises on foot, by bike or car on their way to and from town or to and from the railway station (for example on their daily commute). We therefore consider CARA to be an interested party in this application.

We wish to make it clear that this is an objection to the current premises application and not an objection to the idea in principle of an additional entertainment venue in Kingston. We would have no objection to a venue that provided a variety of entertainment that ensured the safety of visitors and residents alike, of all ages, and that did not cause any public nuisance or crime and disorder.

We formally object to the premises application on the grounds that nowhere does it address and indeed seems to ignore the four Licensing Objectives.

The premises are large (the application states it has a capacity of 2000 people) and the application is to provide all sorts of entertainment including the provision of alcohol 24 hours a day, 7 days a week. It therefore is all the more important that measures are put in place to ensure that the objectives are met – there is great potential otherwise for crime and disorder and for putting children at risk. We give further details below.

We object on the grounds that no operating schedule is provided and no public notice of it.

The applicant states that he will provide an operating schedule at the hearing. How then can the public comment on it? The council's own licensing policy states that it wishes to 'ensure that there is effective public participation in the process', and the guidance provided by RBK states: 'It is expected that prior to making any application under the act, applicants will have undertaken a full risk assessment of the impact of their activities on the promotion of the licensing objectives. Thereafter, applicants are expected to submit a detailed operating schedule as part of the application'. There is currently no evidence of either a risk assessment or an operating schedule.

The application will be amended without public consultation or participation.

The applicant states that the operating schedule will be produced at the hearing. This surely constitutes an amendment to the application.

/continued overleaf

The government's guidance on making representations states: Any amended application would need to be re-advertised as set out above. Interested parties will then have the opportunity to decide whether to make representations about the new application.

There are no measures described to prevent crime and disorder.

How will the applicant promote the prevention of crime and disorder? Will there be security staff? Will they be trained to deal with possible outbreaks of violence (or better still, be able to spot and defuse situations before violence arises). Will they have drugs training? There is no drugs policy. What police liaison will there be? Will there be notification of major events? For example, 2000 people watching a sporting event having alcohol available all hours and then leaving perhaps feeling angry if they didn't get the result they wanted is a potentially explosive situation. How will the surrounding property be protected?

There is no promotion of public safety

There is no fire risk assessment, or risk assessment of any kind. There are no emergency evacuation procedures. There is no health and safety policy or indication that there will be anyone on the premises with health and safety training. There is no information regarding what sort of entertainment will be allowed with regard to public safety. Alcohol will be available 24/7 – how will the potential for alcohol abuse be addressed? The venue is on a busy thoroughfare – how will the potential for traffic accidents be minimised? How will food hygiene be addressed?

A capacity of 2000 represents a potential 20% increase in night-time visitors : what measures will be taken to ensure they leave safely? Is the town and transport infrastructure adequate to cope with these numbers?

There is no promotion of the prevention of public nuisance

The venue is on a busy highway – the main route for pedestrians into Kingston town centre and the railway station. Will the pavement outside be crowded by visitors waiting to be admitted? Or by smokers?

What is to prevent visitors from taking drinks, glasses and bottles outside? Or dropping litter from food?

How will the issue of noise from late-night revellers be addressed? Or music and noise from open doors and windows?

How will children be protected from harm?

There is the potential for a variety of activities at the same time – some suitable for children and others not. So for example, there may be a nightclub in one part of the building and family type entertainment (say a televised football match) elsewhere. How will the children be safeguarded?

What measures are there to prevent under-age drinking?

What measures are there to protect children from unsuitable entertainment?

What measures will ensure the protection of child performers?

We would welcome a revised application which addressed the licensing objectives and gave more details of the operations of the venue, and which gave interested parties the opportunity to reflect and comment on them.

Yours faithfully,

Hugh D.M. Scantlebury
Chairman