

# FAREHAM

## BOROUGH COUNCIL

### LICENSING ACT 2003 – REPRESENTATION FORM

To make a representation in respect of an application for a Premises Licence or Club Premises Certificate please complete the following form. For representations to be considered relevant they must relate to one or more of the four "Licensing Objectives" (listed below).

Please note all representations will be made available for applicants to view. If you make a representation objecting to the application it is likely that you will be called upon to attend a hearing and present your objection before a Licensing Panel.

#### Personal Details

Name: [REDACTED]

Address: [REDACTED]

Postcode: [REDACTED]

Contact telephone Number: [REDACTED]

\*Please withhold personal details from applicant.

#### Licence application you wish to make a representation on

You do not need to answer all of the questions in this section, but please give as much information as you can:

Licence number: 10259

Name of Applicant: Mr Chris Nunn

Name of Premises: Cams Hill School

Premises Address (where the Licence will take effect):

Shearwater Avenue, Fareham

Postcode: PO16 8AH

#### Reason/s for representation

Under the Licensing Act 2003, for a representation to be relevant it must be one that is about the likely effect of the application on the promotion of the four licensing objectives.

Any representations that are considered to be vexatious or frivolous will not be considered.

Fill in reason/s for your representation in the space provided under each Licensing Objective it relates to.

### **The Prevention of Crime and Disorder:**

The applicant lists his role as School Business Manager, so it is unclear whether the intent of the applicant is to

- a) Reduce the administration time spent on the small number of temporary licences currently requested by the school to support school activities
- or
- b) Increase School revenues by letting out school facilities to organisations such as rugby clubs or other entities where regular drinking is part of the club ethos, or other events such as wedding receptions.

The request for a 7 day licence indicates to me that the money for running alcohol themed ventures at the weekend is driving this application.

The schools statutory disclosure page ( <https://www.camshill.com/information/statutory-information/> ) Indicates that the Mr Nunn and Gwennan Harrison-Jones, have jointly set up a cleaning company owned by the school. My knowledge of the law is not sufficient for me to comment on the legality of school officers acting as directors and possibly taking fees as directors for a company set up to provide cleaning services to the school, or to organisations that are renting school facilities.

### **Public Safety**

#### **Public Safety – a) Alcohol and driving**

*Even small amounts of alcohol can affect your ability to drive so the only safe advice is to avoid any alcohol if you are driving ( [Drinkaware.co.uk](http://Drinkaware.co.uk) )*

*Any amount of alcohol in your bloodstream can impact your driving ability. The effects of alcohol abuse vary greatly, putting you at risk for causing an accident or highway injury. Safe driving requires the ability to concentrate, make good judgements and quickly react to situations. However, alcohol affects these skills, putting yourself and others in danger. ( <https://www.alcoholrehabguide.org> )*

British Standard BS 12464:2014 table 5.9 gives a breakdown of how the different lighting classes for different types of car park can be determined. ( <http://www.mma-consultancy.co.uk/car-park-lighting/car-park-lighting-regulations/> )

Prior to the Pandemic, school events on Thursday evenings caused parking from the school to overflow onto Shearwater Avenue, I mention it here because the school parking arrangements are sufficient for staff, but not sufficient for some of the “out of hours” events currently being operated. This is identified as a Public Safety issue because the current school parking is not properly provided or lit for high levels of traffic, in hours of darkness that does currently occur. The (pre-lockdown) Thursday evening situation is already a public safety nightmare where safety of pupils and parents when walking between haphazardly parked cars in darkness, add to that situations some parents inevitably have their driving ability even slightly impaired by alcohol will increase the Public Safety risk as parents and pupils exit the site.

#### **Public Safety – b) Covid-19**

Today’s news talks about having to close pubs to balance the risk of increased spread of Covid-19 due to opening schools – observations from countries like the United States and Japan indicate that alcohol consumption leads to poor social distancing practiced when alcohol is consumed. The schools published Covid-19 risk assessment includes specific actions, I quote,



11. *Minimisation of face-to-face meetings.*

12. *Stopping non-essential visitors and contractors coming to site*

( <https://www.camshill.com/wp-content/uploads/2020/07/Covid-Risk-Assessment.pdf> )

The risk assessment is silent how the school will manage the risk of the existing practice of providing alcohol at school events, nor does the risk assessment indicate that an extended alcohol licence operable from noon to 11 pm 7 days a week is needed to better manage the catastrophic impact that Covid-19 is having on staff and pupils and their ability to attend school.

The Covid-19 pandemic is the biggest threat to organisations of all sizes and I would have thought that responsible management of the school would be totally focussed on minimising the risk to the school operation due to Covid-19. If an extended alcohol licence was part of keeping staff and students safe, well and good, but managing the supply of alcohol is not listed in the schools Covid-19 risk assessment. I would question the wisdom of any management team that was doing any activity (such as seeking to extend alcohol licences) that was not absolutely essential to minimising the physical and long term educational risk to staff, parents, and pupils from Covid-19.

Emergency laws introduced this year requires venues that serve alcohol need to comply with stringent operating procedures, such as no standing at the bar, servers wearing masks and visors, app based ordering, maintaining a list of visitors for contact tracing. None of these legal requirements are identified in the schools Covid-19 risk assessment.

I suggest that the increased challenges of supplying alcohol on school premises be properly addressed in it's Covid-19 risk assessment prior to seeking to extend the occasional alcohol provision that occurred in the past.

### **The Prevention of Public Nuisance**

The degree of public nuisance that can arise depends on the intention of the School and its Business Manager – the applicant.

I assume the school already has permission for performance of music, combined with the 7 day a week noon to 11 pm alcohol licence would make it possible for the school to rent it's buildings for parties and wedding receptions. The application for the 7-day licence, rather than a school day licence indicates that the Business Manager is chasing the money, rather than seeking to do what's right by the pupils and schools neighbours.

If the school intention is to raise funds for the school by increasing out of hours use of the school buildings then there will be increased Public Nuisance to the close neighbours of the school. The use by the (pre-lockdown) Boxercise class and Cricket club is already noticeable, extending this to organisations that need the ability to supply alcohol as a reason to rent space at the school is likely to increase the degree of Public Nuisance experienced by neighbours to the school. In our case it is likely to reduce our enjoyment of our garden, due to the noise and disruption of people drinking alcohol from noon until 11.pm 7 days a week.

### **The Protection of Children from Harm**

Personally, I can see no need for any school to normalise supply of alcohol on school premises. I have highlighted above the increased risk to children exiting a school building through an underlit haphazard carpark from drivers whose ability may be diminished by "just the one". This risk will be increased by school staff not trained in supply of alcohol inadvertently supplying oversize measures.

Government data ( <https://digital.nhs.uk/data-and-information/publications/statistical/statistics-on-alcohol/2018/part-4> ) show that in the UK in 2017, last year for which data is available, approximately 17% of UK adults drank more than 6-8 units on a heaviest drinking day in the last week.

This means that it is likely that in any class of school children there will be some that are adversely affected by their parents drinking. I can think of no situation where a child affected in this way will benefit from their seeing their school providing yet more alcohol to their parents.

The risk of Covid-19 causing harm to children is still not fully understood, either from the virus infection itself or from the emotional harm caused by passing it on to an older family member. This, I suspect will be the recurring theme in the news when schools return in September.

I have mentioned already that the schools Covid-19 risk assessment makes no mention of how alcohol will be safely supplied. The schools Covid-19 risk assessment also says nothing about extra support children who become silent carriers will need, this is relevant here, because no amount of management effort is guaranteed to keep a school safe and functioning in the Covid-19 era.

A school management team that is busy pursuing a noon to 11pm, 7 day a week alcohol licence without properly identifying some of the widely anticipated challenges their pupils will face in this Covid-19 era, in my opinion, is not functioning in the best interest of the children, staff or wider school community.

I, [REDACTED], hereby declare that all information I have submitted is true and correct.

Signed: ..... [REDACTED] ..... Dated: *26<sup>th</sup> August 2020* .....

Please send completed form to:

The Licensing Team  
Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
PO16 7AZ



# FAREHAM

## BOROUGH COUNCIL

### LICENSING ACT 2003 – REPRESENTATION FORM

To make a representation in respect of an application for a Premises Licence or Club Premises Certificate please complete the following form. For representations to be considered relevant they must relate to one or more of the four "Licensing Objectives" (listed below).

Please note all representations will be made available for applicants to view. If you make a representation objecting to the application it is likely that you will be called upon to attend a hearing and present your objection before a Licensing Panel.

#### Personal Details

Name:

Address:

Postcode:

Contact telephone Number:

\*Please withhold personal details from applicant.

#### Licence application you wish to make a representation on

You do not need to answer all of the questions in this section, but please give as much information as you can:

Licence number: 10259

Name of Applicant: Mr Chris Nunn

Name of Premises: Cams Hill School

Premises Address (where the Licence will take effect):

Shearwater Avenue, Fareham

Postcode: PO16 8AH

#### Reason/s for representation

Under the Licensing Act 2003, for a representation to be relevant it must be one that is about the likely effect of the application on the promotion of the four licensing objectives.

Any representations that are considered to be vexatious or frivolous will not be considered.

Fill in reason/s for your representation in the space provided under each Licensing Objective it relates to.

**The Prevention of Crime and Disorder:** It is understood that the school currently applies for a limited number of temporary annual licences for use at school events.

It is not known during what additional events the school wishes to supply alcohol and why the school would consider the temporary application for the current number and type of events warrants an application for a licence permitting the supply of alcohol on an unrestricted basis, 7 days a week during the hours of 1200 to 2300? It can only be assumed that the intention is to increase the number and type of out of hours and weekend events.

From what has previously been a small number of events, closely controlled and monitored by the school and restricted as such by the application for temporary licences from the council, the freedom would given to increase this to any number of events, connected or unconnected with the school, with participants allowed access to the school and permitted to drink alcohol on an unrestricted basis. This increased activity could lead to risk of individuals, fuelled by alcohol intake, causing damage to resident's property and affecting their safety and security.

### **Public Safety**

Some previous out of hours events at the school have caused high levels of traffic using Shearwater Avenue, as the level of parking at the school is insufficient. This situation currently can at times be hazardous to residents leaving or returning to their properties and pupils and parents leaving the school. An increase in this traffic from additional events, mixed with side effects from drivers with impaired abilities due to alcohol intake, is a risk to public safety.

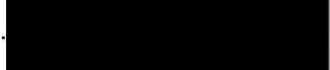
### **The Prevention of Public Nuisance**

Noise levels, additional traffic and parking problems from the current number of events is already at times, a public nuisance. Any increase will have a severe impact on this residential area.

### **The Protection of Children from Harm**

The school is supposed to be a place for children to learn, and not an environment which has alcohol for sale on an unrestricted basis. It should also not be a place which is sublet outside of school hours to other organisations, with the sale of alcohol being used to generate revenue.

I,  hereby declare that all information I have submitted is true and correct.

Signed:  ..... Dated: *3 August 2020*

Please send completed form to:

The Licensing Team  
Fareham Borough Council  
Civic Offices  
Civic Way  
Fareham  
PO16 7AZ