Brighton & Hove City Council

LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS) ADDENDUM 1

10.00AM, MONDAY, 2 NOVEMBER 2026

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ADDENDUM

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BRIGHTON & HOVE CITY COUNCIL

LICENSING PANEL

Licensing Act 2003

Application to Vary the Late Night Refreshment (LNR) Premises Licence (currently delivery only till 03.00 and dine-in till midnight)

Taco Bell, 134-135 London Road, Brighton

Premises Licence No. 2025/00906/LAPREN

SUBMISSIONS ON BEHALF OF KARALI QSR LIMITED

Introduction

These submissions are made on behalf of Karali QSR Limited ("the Applicant") the franchisee operator of Taco Bell at 134-135 London Road, Brighton.

They should be read in conjunction with the various attachments (see below).

The Applicant respectfully submits that the variation application should be granted as amended and subject to the conditions agreed with Sussex Police together with the further volunteered safeguard conditions set out below.

At the outset it is important to recognise the nature of the application before the Panel. This is not an application for a new late-night premises. The premises already benefits from Premises Licence No. 2025/00906/LAPREN, granted on 14 May 2025, which authorises the provision of home delivery until 03:00 hours and customer dine-in until 00.00. That licence was granted without objection from Sussex Police or the Licensing Authority notwithstanding that the authorised hours exceed those suggested within the Council's Licensing Matrix.

The issue for the panel is whether late-night takeaway as well as home delivery until 03.00 and dine-in till 00.30 can safely take place from these premises without undermining the licensing objectives.

The Applicant respectfully submits that the evidence demonstrates that it can.

Existing Operation and Trading History

The Applicant relies heavily upon the actual operational history of the premises.

Taco Bell has traded from this address since the 1st November 2021. Both prior to and since the grant of the premises licence, Taco Bell has traded without any incidents linked to the premises and without any evidence of crime and disorder, public nuisance or anti-social behaviour attributable to its operation.

This is a particularly important consideration as the premises already operates home delivery until 03:00 hours and dine-in till midnight pursuant to its premises licence.

The evidence before the Panel is therefore not speculative. The Applicant has already demonstrated that late-night delivery may be provided from the premises without undermining the licensing objectives.

The Applicant submits that actual operational experience should carry significantly greater weight than theoretical concerns as to what may occur in the future.

The Amended Application

The Panel will be aware that the application originally sought authority for both takeaway and later dine-in use.

Following discussions with Sussex Police, the Applicant carefully reviewed the concerns raised and took the decision to amend the application substantially.

The application no longer seeks authority for customers to remain within the premises consuming food and drink after 00:30 hours.

Instead, the premises will operate solely as a takeaway and delivery facility during the later hours of operation.

This amendment directly addresses concerns relating to customer congregation and prolonged dwell times and demonstrates the Applicant's willingness to engage constructively with responsible authorities.

The Applicant submits that considerable weight should be attached to that constructive approach.

Positive Engagement with Sussex Police

The Applicant respectfully submits that the documentary evidence demonstrates a positive working relationship between the premises and Sussex Police.

Throughout the operation of the premises there has been regular dialogue and engagement with Sussex Police officers, including Pc Mark Thorogood and Pc Wade.

In correspondence following meetings attended by Fazeel Mohammed and Mina on behalf of the premises Mark Thorogood expressly refers to the positive and productive engagement that had taken place between Sussex Police and representatives of Taco Bell.

Karali asserts that correspondence provides an important insight into the nature of the relationship between the premises and Sussex Police.

The record presents a picture of an operator that engages openly with responsible authorities, seeks guidance where appropriate and is willing to adopt practical solutions to address concerns.

The Applicant respectfully submits that the tone and content of that correspondence sits comfortably with the description of a responsible operator and should be taken into account when assessing the weight to be afforded to the representation.

Alleged Breaches and the Applicant's Response

The Applicant recognises that allegations of licence breaches have been raised during the consultation process.

The Applicant does not seek to diminish the importance of compliance with licence conditions.

However, the Panel is invited to consider not merely the allegations themselves but also the manner in which the Applicant responded once concerns were identified.

The evidence of David Pratt explains the circumstances giving rise to those concerns and the subsequent engagement with Sussex Police.

Importantly, there has been no attempt to disregard the concerns raised by responsible authorities.

Meetings were swiftly attended, responses were provided, correspondence exchanged, operational practices were reviewed and further safeguards were considered and implemented.

The Applicant submits that this response is highly relevant when considering operator history and management standards.

The Licensing Matrix recognises the importance of responsible management and good operator status.

The evidence demonstrates a business that engages with regulators, listens to concerns and takes positive steps to address them.

The Applicant respectfully submits that the totality of the evidence supports the conclusion that Taco Bell is a responsible operator committed to compliance and promotion of the licensing objectives.

Temporary Event Notices

The premises has also operated successfully with takeaway sales under a number of Temporary Event Notices as follows:

23rd May to 25th May 2025 (Spring BH)

31st December 2026 to 1st January 2027 (New Years Eve)

1st August to 3rd August 2026 (Pride weekend until 04.00 when in accordance with its risk assessment the premises voluntarily deployed two SIA registered door supervisors.)

28th August to 30th August 2026 (Last week of Summer holidays)

All TEN's were approved without objection and all proceeded without incident.

Whilst the Applicant accepts that Temporary Events in themselves do not determine the outcome of the present application, they provide valuable evidence that the premises is capable of managing later trading hours responsibly and effectively for both takeaway and home delivery.

They also demonstrate a willingness to deploy enhanced control measures where circumstances require.

Comparable Licensed Premises

The Panel is entitled to take account of comparable premises operating within the locality.

The nearby KFC London Road premises benefits from an authorisation permitting takeaway and delivery operations until 03:00 hours as well as dine-in till 00.30.

That licence was granted following a contested hearing.

The Applicant accepts that each application must be considered on its own merits.

However, consistency remains an important feature of public decision-making.

The Applicant respectfully submits that there is no evidential basis for treating Taco Bell less favourably than a comparable operator situated only a short distance away, particularly where Taco Bell already benefits from a licence permitting takeaway operation until 03:00 hours and has demonstrated responsible management and constructive engagement with responsible authorities.

Additional Safeguards

The Applicant has agreed the conditions proposed by Sussex Police.

In addition, the Applicant voluntarily offers the following safeguards.

Additional Condition 1

After 00:30 hours all customer tables and chairs shall be cleared from the customer area. No seating shall be made available, and no customer shall be permitted to consume food or drink within the premises.

Until the terminal hour for late night refreshment, customers may enter only to order takeaway food at the counter, collect an order or use the toilet whilst awaiting an order.

Delivery riders may enter to collect orders and use the toilet.

Customers and delivery riders shall leave promptly after collecting their orders.

1. This condition formalises the amended application.
2. It removes any prospect of late-night dine-in activity.

3. It ensures that the premises operates as a takeaway and delivery business only after 00:30 hours.
4. It materially reduces opportunities for congregation and prolonged customer dwell time.

Additional Condition 2

Whenever the premises trades after midnight this Late Night Safeguarding Procedure shall be in operation.

A designated delivery host shall oversee the orderly queuing and prompt departure of takeaway customers and delivery riders and prevent loitering within the premises.

The host shall monitor the premises frontage, ask customers not to consume food or drink immediately outside the premises and take reasonable steps to disperse those who do.

The duty manager and staff engaged in late-night customer service shall be briefed on the procedure which shall include:

• Assistance to persons who appear vulnerable or at risk;

• Refusal of service where conduct presents a risk;

• Contacting emergency services where necessary; and

• Recording relevant incidents and actions taken.

The procedure and incident log shall be available for inspection by the Police or an authorised officer upon request.

1. This condition establishes a proactive management regime aimed specifically at safeguarding, dispersal, queue management and prevention of public nuisance.
2. It directly addresses concerns regarding congregation, anti-social behaviour and the welfare of vulnerable persons.
3. The Applicant submits that the proposed safeguards go significantly further than is often encountered in comparable late-night takeaway operations.

The Police and LA Representations

The Applicant fully respects the role of Sussex Police and acknowledges the importance of their contribution to the licensing process. The same of course can be said of the Licensing Authority.

However, the Applicant respectfully submits that there is a significant difference between evidence demonstrating a likelihood of harm and concerns based upon what might happen.

The premises already operates delivery until 03:00 hours.

There is no evidence of crime and disorder or public nuisance arising from the operation of the premises.

The premises has successfully operated under Temporary Event Notices extending LNR until 04:00 hours with both takeaway and delivery.

The Applicant has engaged positively with Sussex Police throughout.

The Applicant has accepted the conditions proposed by Sussex Police.

Additional safeguards are now voluntarily offered.

Viewed objectively, the evidence points towards responsible operation rather than risk.

The Legal Framework

The Panel is required to determine the application with a view to promoting the licensing objectives.

Any decision must be evidence-based, proportionate and justified by the material before the Panel.

The Applicant relies upon the principles identified by the High Court in *Daniel Thwaites plc v Wirral Borough Magistrates' Court* [2008] EWHC 838 (Admin).

That authority confirms the importance of evidence-based decision-making in licensing matters and serves as a reminder that concerns, assumptions or generalised fears cannot properly substitute for evidence.

The Applicant submits that the principle has direct relevance to this application.

The objective evidence before the Panel demonstrates:

- an existing premises licence permitting delivery until 03:00 hours;
- a history of responsible operation;
- no evidence of crime and disorder attributable to the premises;
- successful operation of takeaway and delivery under TENs until 04:00 hours;
- positive engagement with Sussex Police;
- constructive responses to compliance concerns;
- agreement to police conditions; and
- additional safeguards volunteered by the Applicant.

Against that evidential background, the Applicant respectfully submits that there is no proper basis for concluding that the variation sought is likely to undermine the licensing objectives.

National Licensing Policy Framework

The National Licensing Policy Framework, published on 26 November 2025, encourages licensing authorities to consider expressly the scope for their decisions to promote growth and deliver economic benefits alongside safeguarding the licensing objectives. Section 4.2 confirms that authorities should take it into account as guidance, alongside the Licensing Act 2003, the section 182 Guidance and their own licensing policies. It is accordingly submitted that the Sub-Committee should consider the application in the light of that national policy direction.

Of particular relevance, section 5.3 states that licensing should be “permissive by design” and advocates a light-touch approach to responsible operators. Authorities are encouraged to avoid unnecessary prescription and allow businesses to demonstrate how their arrangements will control risks effectively and proportionately. This supports an assessment of the Taco Bell premises, the evidence and the safeguards proposed, with restrictions tailored to identified risks. It is submitted that this approach should inform the determination of the present application, giving proper weight to the operator’s proposed measures.

Conclusion

The Applicant respectfully submits that the evidence before the Panel demonstrates a well-managed premises with a proven history of responsible operation.

The premises already trades with takeaway until 03:00 hours and dine-in till midnight.

The use of TEN's provides evidence that takeaway can be safely provided without issue.

The Applicant has engaged positively with Sussex Police.

Concerns have been addressed through amendments to the application.

Police conditions have been accepted.

Additional safeguards have been volunteered.

A comparable competitor of ours located a small distance along the same road and also within the Council's 'stress area' was granted a premises licence only two years ago for exactly what we are now asking for.

There is no evidential basis for concluding that the variation sought will undermine the licensing objectives and based on the evidence, this application meets the 'exceptional circumstances' as required by the Statement of Licensing Policy.

Accordingly, the Applicant respectfully invites the Panel to grant the application as amended and subject to the agreed and volunteered conditions.

WITNESS STATEMENT OF DAVID PRATT

Premises: Taco Bell, 134–135 London Road, Brighton
Licensing Act 2003

I, David Pratt, make this statement in support of the application by Karali QSR Limited to vary the premises licence in respect of Taco Bell, 134–135 London Road, Brighton.

1. My Background

1. I am the Operations Lead for Karali QSR Limited ("Karali").
2. Karali is a Quick Service Restaurant operator and currently operates approximately 40 Taco Bell restaurants throughout the United Kingdom.
3. I have spent virtually my entire working life within the Quick Service Restaurant industry and have worked within the business for approximately 30 years. It is the only industry in which I have worked since leaving school. As a result, I have extensive experience of the operational requirements of the business and of the responsibilities placed upon a premises licence holder.
4. In my role as Operations Lead, I am responsible for ensuring that the restaurants within my area of responsibility are operated professionally, safely and responsibly. I take those responsibilities extremely seriously and am committed to ensuring that the premises for which I am responsible operate in a manner which promotes the licensing objectives and does not give rise to crime, disorder, anti-social behaviour or public nuisance.

2. The Business

5. Taco Bell is an internationally recognised Quick Service Restaurant brand.
6. Our restaurants are popular with customers and provide freshly prepared food and soft drinks for consumption both on and off the premises, together with home delivery services.
7. Importantly, Taco Bell does not sell alcohol. The business is concerned solely with the provision of food and soft drinks.
8. Many, and indeed the majority, of the Taco Bell restaurants operated by Karali benefit from late-night refreshment permissions extending into the early hours of the morning. Karali therefore has substantial experience of operating late-night food premises responsibly and in accordance with the licensing objectives.
9. In addition to Taco Bell, Karali operates other reputable restaurant and food brands, including The Real Greek, Côte Brasserie and Crosstown Doughnuts. We therefore understand the importance of maintaining high operational standards and applying best practice consistently across our estate.

3. The Application and Revised Position

10. The application originally sought permission for dine-in, takeaway and home delivery services until 03:00 hours.
11. Following representations from Sussex Police and the Licensing Authority, the Applicant has carefully considered the concerns raised and has sought to engage positively and constructively with the responsible authorities.
12. Having done so, the Applicant has decided not to pursue those aspects of the application which would extend beyond the permissions already enjoyed by neighbouring operators.
13. In particular, the Applicant understands that the neighbouring KFC premises benefits from a premises licence permitting customers to dine within the premises until 00:30 hours and permitting takeaway and home delivery services until 03:00 hours.

14. The Applicant therefore proposes that the premises operate on the following basis:

a. Dine-in facilities will cease at 00:30 hours;

b. Takeaway sales may continue until 03:00 hours; and

c. Home delivery operations may continue until 03:00 hours.

15. The Applicant's revised position is therefore intended to mirror the position already permitted at the neighbouring KFC premises.

16. I would also like to address the matters raised in the representation from Sussex Police.

17. I accept and regret the criticism concerning the omission to have all matters fully in place by 15 May 2025. The issue was, however, addressed promptly.

18. On 16 May 2025, our Regional Manager, Fazeel Mohammed, and the Store Manager, met with the Police Licensing Officer, Mark Thoroughgood. Following that meeting, Mr Thoroughgood emailed to thank us for our time and confirmed that both he and PC Wade had found the meeting to be productive.

19. In relation to the CCTV system, it appears that the store had been using an incorrect CCTV format, which resulted in difficulties in downloading and sharing recorded footage.

20. The CCTV system itself was operational. Images were being recorded and could be viewed on site, but there were technical difficulties in downloading the footage in the required format.

21. This matter was also addressed and resolved promptly, following which positive feedback was received from Sussex Police.

22. I am pleased to confirm that there have been no other issues of this nature.

23. To the extent that there were shortcomings, both matters were dealt with promptly and neither related to any incident of crime, disorder or anti-social behaviour. In my view, they do not detract from Karali's commitment to operating the premises responsibly and promoting the licensing objectives.

4. Conditions

24. The Applicant is willing to accept all conditions proposed by Sussex Police and the Licensing Authority.

25. The Applicant recognises that those conditions are intended to promote the licensing objectives and is content for them to be attached to the varied premises licence.

5. Home Delivery Policy and Late-Night Arrangements

26. The Licensing Authority has previously been provided with the Taco Bell Home Delivery Policy.

27. A key feature of that policy is the appointment of a dedicated Home Delivery Host.

28. The Home Delivery Host is responsible for supervising delivery riders and drivers, managing the collection process, ensuring that drivers conduct themselves appropriately and dealing promptly with any concerns or issues that may arise.

29. In addition, the Applicant has prepared a Late Night Arrangements Policy, which accompanies this statement as a separate document.

30. These arrangements are intended to ensure that the late-night operation of the premises is properly supervised and managed, with particular emphasis on the orderly collection of takeaway orders, the conduct of delivery riders and the prevention of unnecessary congregation at or immediately outside the premises.

6. Operation of Late-Night Takeaway Facilities

31. The Applicant recognises the distinction between customers who are dining within the premises and customers who attend solely for the purpose of collecting or purchasing takeaway food.

32. Once the dine-in element of the operation ceases at 00:30 hours, all tables and chairs will be removed from use. The premises will therefore no longer operate as a restaurant in which customers may sit and consume food.

33. After 00:30 hours, customers attending the premises will be limited to those who:

a. wish to place an order for takeaway food at the counter; or

b. wish to collect an order which has been placed in advance through the Taco Bell website or another approved ordering platform.

34. Customers will not be permitted to remain within the premises once their order has been handed over. Upon collecting their food, customers will be expected to leave the premises promptly.

35. The Home Delivery Host will supervise this process and will ensure that customers do not remain on the premises after receiving their orders.

36. There will be no provision for customers to sit and consume food within the premises after 00:30 hours.

37. Customers will likewise not be permitted to congregate or consume food immediately outside the premises.

38. To assist with the orderly management of the premises we accept the police recommended condition that at least one SIA registered supervisor will be on duty anytime the premises trade past midnight until the venue is closed. In addition our toilet facilities will remain available to delivery riders and to members of the public who are legitimately waiting to collect an order.

7. Commitment to the Licensing Objectives

39. Karali has extensive experience of operating late-night food premises throughout the United Kingdom and understands the particular responsibilities that arise from late-night trading.

40. We have no interest in operating the premises in a manner which undermines the licensing objectives or causes difficulties for local residents, neighbouring businesses or the responsible authorities.

41. In my professional experience, the combination of:

a. the dedicated Home Delivery Host;

b. the Home Delivery Policy;

c. the Late Night Arrangements Policy;

d. the removal of tables and chairs after 00:30 hours; and

e. the requirement for customers to leave promptly after receiving their orders,

provides a robust and effective framework for the responsible operation of the premises during the late-night period.

42. These measures, together with the conditions proposed by Sussex Police and the Licensing Authority, provide appropriate safeguards to ensure that the premises continue to operate in a manner which promotes the licensing objectives.

8. Conclusion

43. I respectfully invite the Licensing Panel to grant the application as amended.

44. The Applicant has listened carefully to the concerns raised by the responsible authorities and has responded constructively.

45. In particular, the Applicant has:

a. accepted all conditions proposed by Sussex Police and the Licensing Authority;

b. reduced the proposed dine-in hours so that dine-in facilities cease at 00:30 hours;

c. aligned its proposed takeaway and home delivery hours with those already permitted at the neighbouring KFC premises; and

d. put in place additional measures to ensure the proper supervision and management of the premises during the late-night period.

46. I believe that the amended application represents a reasonable, proportionate and responsible proposal which appropriately promotes the licensing objectives.

47. I respectfully ask the Licensing Panel to grant the application on that basis.

STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true.

Signed: _____

David Pratt

Dated: _____

Taco Bell, 134 -135 London Road, Brighton – Proposed Additional Conditions

1. There will be a minimum of 1 SIA registered door supervisor at the premises anytime it is trading past midnight, and they will be on duty until the venue has closed.

2. At all times the premises is open to the public, the management will contract the back-up services of an approved mobile support unit (MS) that operates at all times the premises is open to the public, with a minimum of 2 SIA registered Door Supervisors operating from it.

3. A copy of the MSU contract will be retained at the premises and made available for immediate inspection upon request by Sussex Police or Council Officials. The MSU will be accredited by the Brighton Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.

4. Condition 5 on the current licence to be amended slightly to read:

SIA licensed door supervisors shall be employed on any other occasions when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. In addition to risk assessing events being held at the premises, the risk assessment will take into account information or guidance offered by the police and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.

5. After 00:30 hours all customer tables and chairs shall be cleared from the customer area. No seating shall be made available and no customer shall be permitted to consume food or drink within the premises.

Until the terminal hour for late night refreshment, customers may enter only to order takeaway food at the counter, collect an order or use the toilet whilst awaiting an order.

Delivery riders may enter to collect orders and use the toilet.

Customers and delivery riders shall leave promptly after collecting their orders.

6. Whenever the premises trades after midnight this Late Night Safeguarding Procedure shall be in operation.

A designated delivery host shall oversee the orderly queuing and prompt departure of takeaway customers and delivery riders and prevent loitering within the premises.

The host shall monitor the premises frontage, ask customers not to consume food or drink immediately outside the premises and take reasonable steps to disperse those who do.

The duty manager and staff engaged in late-night customer service shall be briefed on the procedure which shall include:

• Assistance to persons who appear vulnerable or at risk;

• Refusal of service where conduct presents a risk;

• Contacting emergency services where necessary; and

• Recording relevant incidents and actions taken.

The procedure and incident log shall be available for inspection by the Police or an authorised officer upon request.

Home Delivery Policy (As revised subject to grant)

Taco Bell – 134 – 135 London Road, Brighton

Home Delivery service at this location is provided by Uber Eats, Deliveroo and Just Eat, three of the most successful food ordering and home delivery platforms in the UK.

The TACO BELL brand has been in a successful relationship with these aggregators since 2017. A key aim for TACO BELL, Karali QSR Ltd and our delivery partners is to ensure that the whole community benefits from the services provided, by meeting guests needs and contributing to economic stability in local communities.

All employees are provided with comprehensive training on the delivery platforms, this includes how to ensure that the provision of home delivery to our guests does not have a negative impact on the local community. Karali QSR Ltd is aware that home delivery may impact our neighbours through noise pollution and driver conduct unless we take stringent measures to prevent such disturbance. We are confident that our Home
Delivery Policy will allow our home delivery operation to proceed without detriment to the community.

Hours and mode of Operation

1. The restaurant will only trade to members of the public until 00:30 Monday - Sunday
2. Home delivery services will operate between the proposed permitted licensed hours of 23:00 – 03:00 Mondays to Sundays
3. After 00:30 daily, blind shutters will be used, and the restaurant will operate as a dark kitchen only with no access by members of the public.
4. After 00:30 daily, signage will be displayed stating Home Delivery only.
5. After 00:30 daily, main fascia signage and lights will be turned off.
6. After 00:30 daily, restaurant music will be turned off.
7. After 00:30 daily, dining area extraction will be turned off.
8. The delivery aggregators system is unable to take orders for home delivery outside of the proposed hours.
9. The restaurant is therefore unable to accept any order once the aggregator has closed the system.

Order Collections

1. Orders will only be delivered to private residential addresses, and not to any public buildings or areas.
2. On arriving at delivery destination, the drivers will park their vehicle in a legal and safe manner.
3. Drivers will immediately turn their vehicle off to prevent noise disturbances.
4. Drivers will immediately deliver the order to the guest.

5. After delivery drivers will only turn their vehicles on when they are ready to leave the delivery location.

Driver Conduct

1. Drivers will not congregate outside either collection or delivery locations but will at all times wait inside the restaurant for orders, and vacate delivery locations immediately after delivery.
2. Drivers will be courteous and polite to members of the public, guests and employees at all times.
3. Drivers are permitted to use restaurant restroom facilities.

Inappropriate driver conduct

1. Any driver considered to be acting inappropriately, or not complying with the collection/delivery procedure will immediately be reported to the delivery aggregator via the feedback function on the aggregator tablet by the duty manager.
2. The duty manager will complete an incident report form to be sent to the Area Coach the same day.
3. The Area Coach will within 24 hours discuss the driver conduct issue with the aggregators Key Account Manager and agree for the driver concerned to be unpaired from this location.

Compliance with policy

1. A new role has been implemented (Driver Host) who will be responsible for home delivery drivers throughout the late trading period, ensuring drivers are not waiting outside the premises, are always waiting in store at all times, and are 100% compliant with this policy. A Driver Host will be on duty daily during LNR hours.
2. The manager on duty will conduct regular travel paths every 30 minutes to follow up with the Driver Host and to ensure that drivers are complying with the collections procedures.
3. The Area Coach will also be responsible for ensuring all drivers comply with the conduct requirements through daily communication with the restaurant, and follow up with the aggregators Key Account Manager if any conduct issues are reported.
4. Contact details for the duty manager shall be displayed in the window of the premises for use by any person who may wish to make a complaint. These details will also be provided to the Licensing Authority, local ward councillors and local residents' associations.

Taco Bell, Brighton – Late Night Arrangements

Premises: Taco Bell, 134-135 London Road, Brighton, BN1 4JH

Operator: Karali QSR Limited

Dining for members of the public will end at 00:30. Thereafter, tables and chairs will be removed, and customers may enter only to order or collect takeaway food at the counter or use the toilet while waiting. Delivery riders may also use the toilet. No customer will be permitted to sit or consume food or drink inside, and staff will discourage consumption immediately outside the frontage. Takeaway and delivery may continue until the licensed terminal hour. This assessment addresses SIA door supervision when trading continues beyond midnight.

SIA door supervision risk assessment

The late-night risks are mainly disorder, vulnerable customers, queuing, and interactions with takeaway customers or delivery riders. The premises does not sell alcohol. After 00:30 there is no dining, but takeaway customers and riders may enter briefly. At least one SIA licensed door supervisor is appropriate whenever trading continues beyond 00:00; more will be employed where the assessment requires.

Period or trigger	Potential risk	Control and deployment
Midnight to 00:30	Dining customers depart while takeaway and riders arrive. Queues, confrontation or a vulnerable person needing help may arise.	At least one SIA licensed door supervisor will control admission, observe the entrance and assist with orderly departure. Staff will monitor queues and refuse service where conduct presents a risk.
After 00:30 to close	Takeaway customers and riders may enter briefly to order, collect or use the toilet. Queuing, loitering or consumption at the frontage can create risk.	The delivery host manages queues and prompt departure, prevents loitering, keeps toilet access orderly and discourages consumption immediately outside. Maintain CCTV and an incident record.

Higher risk occasions	Pride, major events, busy weekends, police intelligence, previous incidents, unusually long queues or a concurrent event nearby may increase risk.	The duty manager assesses staffing before and during each late trading period. More than one SIA licensed door supervisor will be employed where one cannot adequately manage the entrance, queue, customer departure or an identified risk.

Deployment decision and review

The duty manager will record the number of supervisors deployed and any reason for increasing it in the shift or incident log. The assessment will be reviewed after a relevant incident, a material change in trading pattern, or a request from Sussex Police or the licensing authority. The supervisor will remain on duty until late trading has ceased and departing customers or couriers have cleared the immediate entrance area.

Proposed later hours safeguarding condition

1. After 00:30, all customer tables and chairs shall be cleared from the customer area. No seating shall be made available and no customer shall be permitted to consume food or drink within the premises. Until the terminal hour for late night refreshment, customers may enter only to order takeaway food at the counter, collect an order or use the toilet while awaiting an order. Delivery riders may enter to collect orders and use the toilet. Customers and riders shall leave promptly after collecting their orders.

2. Whenever the premises trades after 00:00, this written late-night safeguarding procedure shall be in operation. A designated delivery host shall oversee the orderly queuing and prompt departure of takeaway customers and delivery riders, and prevent loitering inside the premises. The host shall monitor the premises frontage, ask customers not to consume food or drink immediately outside the premises and take reasonable steps to disperse those who do. The duty manager and staff engaged in late-night customer service shall be briefed on the procedure, which shall cover assistance to a person who appears vulnerable or at risk, refusal of service where conduct presents a risk, contacting emergency services when necessary, and recording relevant incidents and actions taken. The procedure and incident log shall be available at the premises for inspection by police or an authorised officer.

From: Brighton Licensing **REDACTED**
Sent on: Tuesday, 27 October 2026 13:42:49 UTC
To: **REDACTED** EHL Licensing **REDACTED**
Subject: Taco Bell, London Road - Further to police evidence.

Dear Emily & EHL,

Further to reading the additional submission from the applicant's agent for Taco Bell, please find some additional evidence that we wish for the panel to have sight of as we will be referring to this now at the hearing.

This was not originally submitted as it was outside of the current premises licence timings however, having read comments from the applicant's agent in their paperwork, we feel it is relevant now for the hearing as they refer to no incidents linked to the venue.

Police Recorded Incidents – Taco Bell, London Road, Brighton since 02nd April 2025 – date of current licence being granted.

08th April 2025 09:35 – Male stolen a food order.
12th April 2025 21:05 – Staff calling in to report a customer losing their phone.
24th August 2025 20:39 – Group of females ordered food, but group of males have then taken it and shouted abuse towards them.
19th September 2025 20:56 – Large group of people being rowdy and shouting. External security reporting two groups are trying to start a fight.
21st October 2025 23:21 – Venue closed but a male is causing issues towards a female staff member.
22nd November 2025 19:19 – Victim finding shelter inside the venue.
28th November 2025 23:42 – Group of teens drinking inside the store and refusing to leave.
02nd December 2025 18:48 – Group of females refusing to leave.
03rd December 2025 22:47 – Group of youths drunk and refusing to leave.
31st December 2025 02:49 – Drunk female refusing to leave.
06th March 2026 12:11 – Drunk person asleep in the store.
13th June 2026 22:53 – Aggressive female in the store accusing staff of stealing her phone.
07th July 2026 20:30 – Male assaulted while entering Taco Bell.
11th August 2026 18:45 – Intoxicated group refusing to leave.
12th August 2026 15:09 – Youths have entered the premises, vaping and jumping on tables and refusing to leave. Been known to do this on other occasions.
24th August 2026 19:13 – Concerns for a drunk male who keeps coming in and out of the store and going into the road.
02nd September 2026 22:20 – Male in store not ordering food but vaping and refusing to leave.

Kind Regards

REDACTED

REDACTED
Police Licensing Officer
Level 4 PALO Qualification

Brighton & Hove Licensing
John Street, Brighton.
Telephone: REDACTED Mobile: REDACTED