

# Licensing Panel (Licensing Act 2003 Functions)

Date:           **4 August 2025**

Time:           **10.00am**

Venue           **Virtual**

Members:   **Councillors:** Cattell, Thomson and Sykes

Contact:       **Francis Mitchell**  
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# AGENDA

## 9 TO APPOINT A CHAIR FOR THE MEETING

### WELCOME & INTRODUCTIONS

## 10 PROCEDURAL BUSINESS

- (a) **Declaration of Substitutes:** Where Councillors are unable to attend a meeting, a substitute Member from the Licensing Committee may attend, speak and vote in their place for that meeting.

(b) **Declarations of Interest:**

- (a) Disclosable pecuniary interests;
- (b) Any other interests required to be registered under the local code;
- (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

- (c) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

**NOTE:** Any item appearing in Part Two of the Agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.

## 11 LORO'S CAFE LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

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Contact Officer: Corinne Hardcastle  
Ward Affected: Round Hill

Tel: 0127329

Date of Publication - Friday, 25 July 2025

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For further details and general enquiries about this meeting contact Francis Mitchell, (01273 294183, email [Francis.Mitchell@brighton-hove.gov.uk](mailto:Francis.Mitchell@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk)

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# Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:	Application for a New Premises Licence under the Licensing Act 2003		
Premises:	Loro`s Cafe, 66 Lewes Road, Brighton, BN2 3HZ		
Applicant:	Florenc Gjona		
Date of Meeting:	04 August 2025		
Report of:	Corporate Director for City Operations		
Contact Officer:	Name:	Corinne Hardcastle	Tel: 01273 292100
	Email:	Corinne.hardcastle@brighton-hove.gov.uk	
Ward(s) affected:	Roundhill		

## 1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a New Premises Licence under the Licensing Act 2003 for Loro`s Cafe.

## 2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a New Premises Licence under the Licensing Act 2003 for Loro`s Café.

## 3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

The application is for a New Premises Licence under the Licensing Act 2003. The application proposes: ***“New Premises Licence Application for Loro`s Cafe. Located in a terraced ground floor retail unit with a small front terrace and a residential flat above. It is situated on a busy main road. The business will operate as a cafe bar with service of food by dine in, customer collection and home deliveries.”***

- 3.1 Section 18 of the application and Dispersal Policy from the agent on behalf of the applicant is detailed at Appendix A and the plan of the premises is attached at Appendix B.

## 3.2 Summary table of proposed activities

	<b>Proposed</b>
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<b>Supply of Alcohol</b>	Every Day: 11:00 – 23:00 On and Off the Premises
<b>Hours premises are open to public</b>	Every Day: 07:00 – 23:30

- 3.3** Special Stress Area: The premises falls within the Special Stress Area. This area is deemed an area of special concern in terms of the levels of crime, disorder, and public nuisance experienced within them. (See paragraphs 3.2 – 3.2.5)

### **Representations received**

- 3.4** Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.5** 2 representations were received. They were received from a local resident and the Licensing Authority.
- 3.6** Representations received had concerns relating to Prevention of Public Nuisance and Prevention of Crime and Disorder.
- 3.7** A representation was received from Sussex Police which included conditions relating to Prevention of Crime and Disorder and Prevention of Public Nuisance. The representation was withdrawn as the applicant agreed to the conditions and amended the operating schedule accordingly.
- 3.8** Full details of the representations and Sussex Police agreed conditions are attached at Appendix C. A map detailing the location of the premises is attached at Appendix D.

## **4. COMMENTARY ON THE LICENSING POLICY**

- 4.1** The following extracts from Brighton & Hove City Council Statement of Licensing Policy are considered relevant to this application and **are numbered as they appear in the policy**:

### **1 Introduction**

**1.1** This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act 2003 (the Act) and having regard to Guidance issued by the Home Office under Section 182 of the act. This policy takes effect from the 4th February 2021. The licensing authority is Brighton & Hove City Council. The purpose of this statement is to promote the licensing objectives and set out a general approach to making licensing decisions. The discretion of the licensing authority in relation to applications under the act is only engaged if 'relevant representations' are made by other persons or responsible authorities. This policy will inform the approach to be taken when deciding applications and imposing conditions when relevant representations are received. It is also intended as a guide for applicants as to what to include in their operating schedules, always recognising that if no representations are received, the application must be granted.



The licensing authority must carry out its functions with a view to promoting the licensing objectives and this policy is framed around those objectives. Each application will be given individual consideration on its merit. The scope of this policy covers the following:

- Retail sales of alcohol.
- The supply of alcohol by or on behalf of a club, or to the order of, a member of the club.
- The provision of regulated entertainment.
- The provision of late night refreshment.

## **1.2 The licensing objectives are:**

- (a) the prevention of crime and disorder.
- (b) public safety.
- (c) the prevention of public nuisance; and
- (d) the protection of children from harm.

## **1.3 Scope**

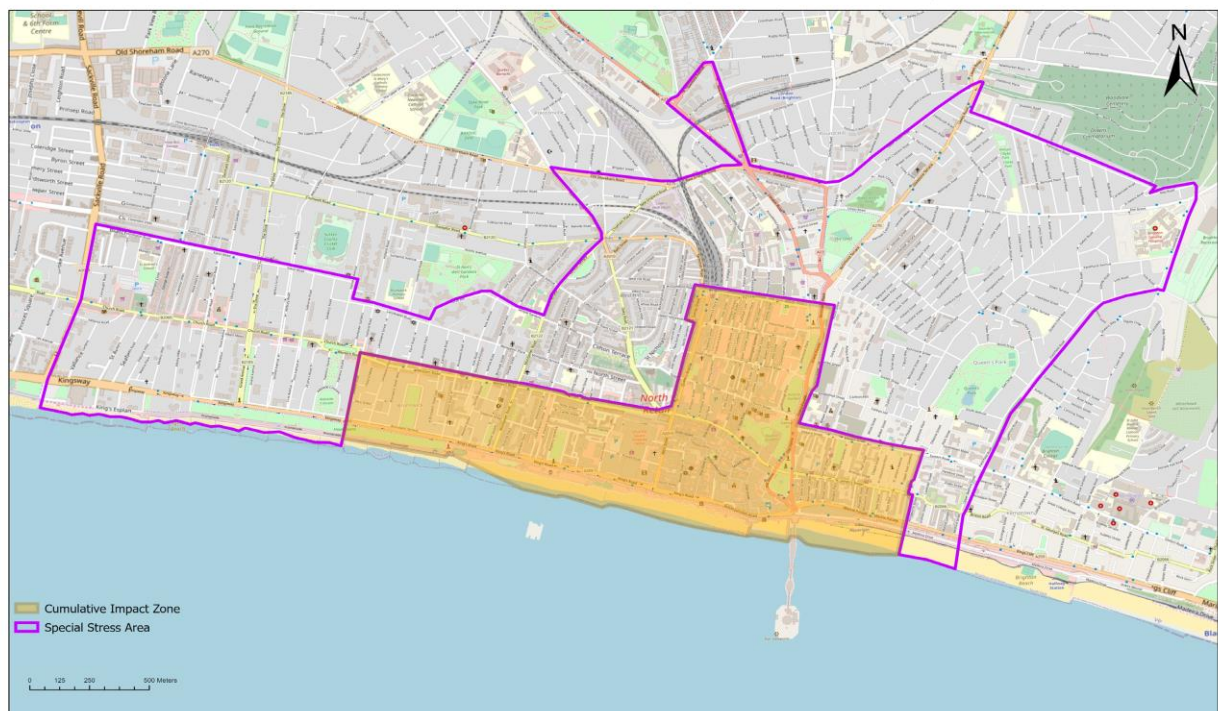
1.3.1 Licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events. Any conditions attached to various authorisations will be focused on matters which are within the control of individual licensees and others with relevant authorisations, i.e. the premises and its vicinity. Each application will be given individual consideration on its merit. Nothing in this policy shall undermine the right of any individual to apply under the terms of the act for a variety of permissions and to have any such application considered on its individual merits. Similarly, nothing in this policy shall override the right of any person to make representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the act.

### 3 Special Policies and Initiatives

#### 3.2 Special Stress Area

3.2.1 The map below details the area of the city centre which borders the Cumulative Impact zone at 3.1.3 and which is deemed an area of special concern in terms of the levels of crime and disorder and public nuisance experienced within it. The area recommended for further monitoring and detailed guidance within the Special Policy comprise the following as pictured below delineated in purple:

Special Stress Area and Cumulative Impact Zone, January 2021



Brighton & Hove Public Health Intelligence, 2021  
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The Special Stress Area - an area bounded by and including: The west side of Hove Street/Sackville Road, northwards to the intersection with the north side of Blatchington Road, along north side of Blatchington Road and Eaton Road, southwards at the junction onto the east side of Palmeira Avenue and then eastwards at the junction onto the north side of Landsdowne Road; eastwards to the junction with Furze Hill, along the north side Furze Hill to its end and then due east along the north side of Victoria Road to its junction with Montpelier Road (west side), north to where Montpelier Road joins Vernon Terrace then north to Seven Dials; north west along the west side of Dyke Road until the junction with the Old Shoreham Road, then East along the north side of Old Shoreham Road, continuing on the north end of New England Road, north west at Preston Circus at the junction of New England Road and Preston Road along the west side of Preston Road until the junction with Stanford Avenue then and north east along the north side of Stanford Avenue until the junction with Beaconsfield Road, south along

the east side of Beaconsfield Road until the junction at Preston Circus and Viaduct Road, eastwards along the north side of Viaduct Road, then at the junction with Ditchling Road, North East along the north side of Upper Lewes Road until the junction with Lewes Road; south along the Lewes Road to junction with Hartington Road, along the north side of Hartington Road until the junction with St. Helen's Road, south into the north side of May Road, eastwards until its junction with Freshfield Road (east side), then south into Upper Bedford Street, into Bedford Street to the mean water mark south of Bedford Street, then due west until the mean water mark south of Lower Rock Gardens; North on Upper Rock gardens, to the north side of Eastern Road, west along Eastern Road and Edward Street until Grand Parade, north along the Eastern side of Grand Parade to the junction of York Place and Trafalgar Street, West along the Northern boundary of Trafalgar Street, up to and including Surrey Street and then South along the Western boundary of Queens Road to the junction with Air Street, West along the north side of Air Street, South-west to the junction of Western Road Brighton, then West along the North side of Western Road Brighton, South along the West side of Holland Road to the mean water mark south of Kingsway and Kingsway Esplanade as far as the west side of Hove Street/ Sackville Road.

3.2.2 This Special Stress Area (SSA) is of concern to the licensing authority because of the relatively high levels of crime and disorder and nuisance experienced within it. The area will be kept under review.

3.2.3 New and varied applications for premises and club premises certificates within the SSA will not be subject to the presumption of refusal, but operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas. Appendix A of the SoLP sets out a list of potential measures the licensing authority considers may be appropriate. These may be more or less appropriate depending upon the style of operation applied for.

3.2.4 On receipt of any application in the SSA, where a relevant representation has been made, the licensing authority will scrutinise the application carefully and will look at the measures proposed in the operating schedules and compare them to the measures set out in Appendix A, Licensing Best Practice Measures. Where discretion has been engaged, those applications which fall short may be refused or conditions applied to comply with policy measures.

3.2.5 The Licensing Authority will keep the Cumulative Impact Zone and Special Stress Area under review. Should the authority find that problems of crime and disorder or nuisance are not improving, or are worsening, the Special Policy will be reviewed.

### **3.3 The Matrix Approach**

#### **The Licensing Authority will support:**

3.3.1 Diversity of premises: ensures that there is a mix of the different types of licensed premises and attracts a more diverse range of customers from different age groups, different communities and with different attitudes to alcohol consumption. It gives potential for positively changing the ambience of the city or an area of it. This will have a positive effect in reducing people's fear of crime and in increasing the number of evening visitors to the city centre. The Community Safety Strategy recognises that too many single uses in a confined area and patrons turning out

onto the streets at the same time may create opportunities for violent crime and public disorder and therefore supports mixed use venues encouraging a wider age balance.

3.3.2 A “matrix” approach to licensing decisions has been adopted and is set out below. It provides a framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success or otherwise to investor and businesses making applications.

Matrix approach for licensing decisions in a Statement of Licensing Policy (times relates to licensable activities)

	<b>Cumulative Impact Area</b>	<b>Special Stress Area</b>	<b>Other Areas</b>
<b>Restaurant</b>	Yes (midnight)	Yes (midnight)	Yes (midnight)
<b>Café</b>	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
<b>Late Night Takeaways</b>	No	Yes (midnight)	Yes (midnight)
<b>Night Club</b>	No	No	No
<b>Pub</b>	No	Yes (11pm)	Yes (midnight)
<b>Non-alcohol lead (e.g. Theatre)</b>	Yes (favourable)	Yes (favourable)	Yes (favourable)
<b>Off-licence</b>	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
<b>Members Club (club premises certificate)</b>	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

Notes on matrix

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

1) Each application will be considered on individual merit

2) Applications within the CIZ are subject to the special policy on cumulative impact at para 3.1, and those within the special stress area to the special stress policy considerations at para 3.2.

3) Departure from the matrix policy is expected only in exceptional circumstances

4) Exceptional circumstances will not include quality of management or size of venue except where explicitly stated in policy matrix.

5) Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).

6) The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre.

7) Other Areas; consideration will be given to the nature of the area and location in relation to any application. In a residential area for example the concerns of local residents will be relevant when considering applications for off-licences, pubs or cafes, especially if there is evidence of anti-social behaviour, street drinking or underage drinking. Earlier closing times may be appropriate. Regard will be had to the Public Health Framework for assessing alcohol licensing on our website.

8) In an area where there are already several existing off-licences or where the premises is situated within a parade with another off licence and where representations are received about negative cumulative impact on the licensing objectives of a further premises, the application may be refused on these grounds or restrictions placed on the terminal hour to reflect opening hours of other shops.

9) Outdoor events will be supported where arranged through the council's event planning process. Generally, regulated entertainment in the open air including tents and marquees should have a maximum closure hour of 2300. Earlier hours may be imposed in sensitive open spaces or near residential areas. The licensing authority will have regard to Noise Council guidance.

10) Non-alcohol led category does not include "alcohol in shared workplaces". It is recommended that sale of alcohol in shared workspaces should have a terminal hour of no later than 10pm. For further advice and guidance on "alcohol in shared workplaces" please see paragraph 3.3.4-3.3.6.

**3.3.3 Cafes** - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following conditions that will prevent the premises becoming a public house.

- The sale of intoxicating liquor and other beverages shall be waiter/waitress service for consumption by persons seated at tables.

- Substantial food shall be available at all times. The licensing authority shall judge each case on its own merits but as a general rule, a bowl of crisps, nuts, or olives does not constitute substantial food.

**3.3.3 Restaurants** - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following restaurant condition.

- Intoxicating liquor shall not be supplied or sold on the premises otherwise than to persons taking table meals there and for the consumption by such a person as an ancillary to their meal. There will be no vertical drinking.
- Restaurants with outside service - the licensing authority will also consider applications from restaurants that request to serve alcohol to areas adjacent to or immediately outside their premises. In addition to the above conditions for cafes, the licensing authority will require evidence that the applicants have an agreement with the local authority to use the area as defined on a plan provided. The following condition may also apply:
- The sale and supply of alcohol for consumption off the premises shall be restricted to an area licensed by the Local Authority for use of the public highway as shown on the plan deposited and such area shall be defined by a physical barrier acceptable to the licensing authority.

### **3.5 Off licences**

In recent years there has been a noticeable shift towards more people buying alcohol from shops and drinking at home prior to going into premises such as pubs and clubs. The council is concerned that alcohol loading from off-licence sales is a significant problem in the city and adversely affects the licensing objectives as it gives rise to problems of drunkenness, disorderly behaviour and a higher risk of alcohol sales to children. Representations from the police, local residents and the director of public health at licensing panel hearings have testified to these problems and Information published in the Public Health Framework for assessing alcohol licensing presents a ward by ward analysis of crime and disorder and health data which is relevant in this respect.

3.5.1 The special policy on cumulative impact and the special stress areas apply to off licences as explained in the matrix approach at 3.3. But in general, where applications are made for new premises or variations to existing licences, and where the police or others make representations against the grant of a further licence for off sales, the council will give specific consideration to restricting the number, type, and the hours of premises selling alcohol exclusively for consumption off the premises. Decisions will be grounded in the Public Health Framework for assessing alcohol licensing. The council will want to be assured that the operating schedule of premises, and their overall management, training and levels of staffing, are appropriate to ensure that the licensing objectives are promoted in what may be challenging circumstances. Retail outlets and stores where the provision of fresh produce is the principal product sold maybe considered more favourably.

3.5.2 The Licensing Authority encourage off licences to join the Council led “Sensible on Strength” scheme to reduce the availability of cheap super strength beers and ciders. Off licences voluntarily sign up not to sell cheap super-strength beers and ciders over 6% ABV and operate good practice measures (see 3.5.3) for which they receive an accreditation as a responsible retailer.

3.5.3 Areas of best practice that may be included in an Operating Schedule include

- the installation of a digital CCTV system by liaison with, and to a standard approved by Sussex Police
- Challenge 25 policy
- Refusals system
- Documented staff training including underage sales, drunkenness and proxy sales
- Voluntary restriction of high strength alcohol - operating schedules may be used to limit high ABV beers and ciders
- BCRP membership (or other accredited scheme)
- No sale of single cans
- Displays should not be located at the entrance/exit points or near checks out

3.5.4 The Licensing Authority and Sussex Police have specific concerns around the delivery of alcohol off the premises due to issues around the end location of delivery, age verification checks (Challenge 25), the increased possibility of the alcohol coming into the CIZ and SSA from other areas, as well as the personal safety of drivers when having to refuse a delivery at the end destination.

3.5.5 Alcohol delivery poses a unique set of challenges as it often transfers the final age verification to a person who has no responsibility in relation to the Premises Licence which authorised the sale of alcohol. A premises licence holder needs to be satisfied that their drivers or the delivery drivers of the third party company they chose to use, have received regular and comprehensive training in age verification and identifying persons who have consumed too much alcohol.

3.5.6 Evidence has shown that customers have previously used landmarks/businesses not related to them as addresses for delivery so that alcohol could be consumed in open spaces/parks. The risk being that this may lead to increased crime and disorder including anti-social behaviour and criminal damage, as well as the possibility that underage persons can gain access to alcohol. Concerns have also been raised about the delivery of alcohol to known street drinking hotspots. Therefore, a condition requiring all deliveries to be to a verifiable residential or business address and a face to face ID verification is vital in mitigating some of this risk.

3.5.7 While the Licensing Authority and Sussex Police recognise this is a growing area of business, new or variation applications to include the delivery of alcohol off the premises will be subject to increased scrutiny. Suggested conditions for the provision of an alcohol delivery service can be found at Appendix A. These are not exhaustive and each application will be considered on its own merits.

## **3.6 Street drinking**

3.6.1 The Licensing Authority will have regard to areas highlighted by Sussex Police that are at risk from alcohol related anti-social behaviour. The nature of these areas can be fluid/seasonal and so updated maps and data will be produced regularly to ensure the information is current. These hot spot areas are considered high risk for street drinkers and the Licensing Authority will have regard to prevention of crime and disorder by virtue of street drinking and anti-social behaviour when considering applications in this area.

### **3.9 Promoters and irresponsible drinks promotions**

3.9.1 The Licensing Act 2003 makes no mention or provision for the use of promoters within licensed premises. Many of the late night bars and clubs within the Brighton & Hove Cumulative Impact Zone regularly hire promoters to sell nights at their venues. In recent years with the introduction of promoters within the Brighton night time economy, several issues have arisen. This includes promoters vouching for underage customers to get them inside licensed premises where they can access alcohol, providing flyers to passers-by who throw them on the floor and irresponsible promotions for their nights. Many premises now have an agreement with their promoter for acceptable promotions and behaviour which includes the signing of a written contract of expectations. This shows premises evidencing their due diligence and ensures that promotion companies know what is expected of them. The contract could include, obligations to pick up self-generated litter, verification of ages of their customers and users of their social media, promoters being over the age of 18 and responsible advertising on social media.

3.9.2 The Licensing Authority expect licensed premises to develop staff policy and training on recognising signs of drunkenness and vulnerability, for example, offering drinking water and tips for refusing customers who appear drunk. And discourage company policies that promote bonuses and sales incentives for selling alcohol. Licensing Authority will expect necessary precautionary processes to restrict drunkenness, e.g. Licensing Guidance states happy hours should not be designed to encourage individuals to drink excessively or rapidly.

## **4 Prevention of Crime and Disorder**

The following details and measures are intended to address the need for the prevention of crime and disorder which may be associated with licensed premises and certificated club premises. Conditions attached to licences and certificates will, as far as possible, reflect local crime reduction strategies.

4.1.1 The licensing authority acknowledges that training and good management play a key part in preventing alcohol and drug related crime. The authority expects that all licensees of on-licensed premises attend training programmes which will raise their awareness of the issues relating to drugs and violence in licensed premises, and that suitable training be extended to all bar staff and door supervisors so that drug dealers and users will be deterred from using licensed premises for illegal purposes and that incidents of violence in licensed premises will be reduced. Licensees are also encouraged to attend training programmes to help identify children at risk and issues of basic child protection. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence.



- 4.1.2 It is expected that the DPS will spend a significant amount of time on the premises. When not on the premises it will be essential that the DPS is contactable, particularly should problems arise with the premises and that staff are authorised by the DPS.
- 4.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.
- 4.1.4 Measures put in place should support the intentions of Operation Marble (police operational order), which aims to prevent incidents of crime and disorder within the night time economy, at weekends. Operation Marble operates with a view to minimising the risk to the public of being a victim of public place violent crime; to reduce incidents of violent crime and public disorder within the city centre; to deal positively with offences and offenders; to secure and preserve evidence which will assist in the prosecution of offenders and to support the night time economy and the responsibly run businesses within it.

## **4.2 Sussex Police**

4.2.1 Sussex Police have a specific Operation relating to the night time economy called Operation Marble (detailed in 3.4.1) and work closely with partners to ensure a safe and vibrant city centre. There continues to be an increasing demand for resources further into the early hours of the morning with the highest concentration of crimes occurring between 21:00 and 06:00 on a Friday into a Saturday and between 20:00 and 06:00 on a Saturday night into a Sunday. The data set used shows that up to 80% of arrests made in the timeframe 20:00 – 06:00 on these days were affected by alcohol. For full details of these statistics see the Cumulative Impact Assessment at Appendix E.

4.2.2 The dealing and use of drugs remains an issue across the city and Sussex Police welcome proactive policies from licensed premises. A drug safe and seizure recording initiative is in place of which further details can be obtained by contacting Brighton & Hove Police Licensing ([brighton.licensing@sussex.pnn.police.uk](mailto:brighton.licensing@sussex.pnn.police.uk)). This initiative encourages licensed premises with Door Supervisors to search and seize drugs from persons attempting to enter their premises and ensures that once drugs are removed from persons, they can be safely collected and destroyed by Sussex Police.

4.2.3 Dispersal from the city centre during the late evening and early morning remains a policing challenge. Over recent years, there has been a proliferation of off-licences and late night refreshment venues along the city's arterial routes. This has led to incident 'hot spots' where patrons from the night time economy continue to interact, albeit away from any safety measures afforded by on-licences. As such, Sussex Police support the Council's Special Policy in offering guidance to both applicants and the Licensing Committee in relation to off-licences and late night refreshment licences.

4.2.4 Sussex Police have continuing concerns that, despite staff training in age-restricted sales, under age individuals are still being served alcohol both on and off the premises in some of the city's licensed premises. As such, regular intelligence-led 'test-purchase' operations are conducted to highlight premises where sales are

taking place and ensure appropriate enforcement action is taken to prevent further sales. The introduction of identification scanning machines at premises throughout the city has proved successful in mitigating some risk, but operators must maintain vigilance regarding the fraudulent use of genuine IDs. Sussex Police continue to work alongside the Business Crime Reduction Partnership to tackle the problem of those who use false or another's identification to enter licensed premises and purchase alcohol.

4.2.5 Sussex Police work closely with venues and other organisations within the city to protect vulnerable people from becoming victims of crime. As well as work to prevent under age sales, vulnerability training is offered to identify persons who may have been made vulnerable through alcohol or drugs. Sussex Police also support initiatives such as (but not limited to) safe spaces, mobile teams of volunteers actively checking people's well-being and the Beach Patrol.

4.2.6 Public Space Protection Orders have proved an effective tool for Sussex Police in targeting enforcement action in problem areas of the city. It 'allows Police Officers and Police Community Support Officers to remove alcohol from any person in a public place if that person is involved in anti-social behaviour (ASB) or the officer believes that by having alcohol in their possession there is an increased risk of ASB. It is an offence to refuse to hand over alcohol when required to do so.' They have been particularly effective in the day time economy where members of the street community are causing ASB issues for members of the public and local businesses, especially during the summer months where there is a large influx of visitors to Brighton & Hove.

4.2.7 Policing the night time economy continues to provide a challenge and in the climate of limited resources and newly emerging problems, Sussex Police support maintaining the council's Special Policy which defines cumulative impact and special stress and will continue to take enforcement action where appropriate if the actions of a Premises Licence Holder, Designated Premises Supervisor, Door Supervisors or Staff have fallen below the high standard expected across the city. Sussex Police also recognise and support businesses which are aware of their social responsibilities and as such, actively contribute towards keeping Brighton & Hove a safe and enjoyable city.

### **4.3 Care, control and supervision of premises**

4.3.1 The Licensing authority supports the Business Crime Reduction Partnership and other approved schemes. Where appropriate, premises licence holders should be members of the BCRP for the deterrence to violent crime that such membership provides. The BCRP NightSafe radio scheme is normally expected as an operational requirement for city centre bars, clubs and pubs and is an example of good practice in achieving the aim of reducing crime and disorder and improving public safety. Well managed pub-watch schemes provide information exchange between the premises licence holders and responsible authorities that reduce and deter violent crime and disorder. The council will support a responsible licensing scheme.

4.3.2 The effective management and supervision of a venue is a key factor in reducing

crime and disorder, both within it and outside. The police will consider the applicants, objecting to the application where appropriate. The police may suggest crime prevention measures in relation to, for example, the internal layout of the premises, closed-circuit television, help points, lighting and security staff. The police may ask for conditions which support such measures to be imposed when licensing applications are granted, eg type of licence, capacity, operating hours restrictions.

4.3.3 Following the grant of a licence, the management and supervision of the premises, in so far as it might impact on crime and disorder, will continue to be monitored. Particular attention will be paid to any licensed premises where there is evidence of criminal activity or any association with racist or homophobic crime. The licensing authority will keep itself well briefed on the nature, location and type of premises where alcohol related violence and disorder are occurring so it can take full account of the facts and avoid exacerbating problems as required by the Community Safety Strategy. Where licensed premises are found to cause nuisance or be associated with disorder or unreasonable disturbance, the review process may be invoked, and powers of revocation or the imposition of conditions may be considered. Conditions may include use of closed-circuit television, licensed door supervisors and earlier closing times. Such action to restrict the operation may be taken for trial periods to allow businesses an opportunity to remedy existing disorder, nuisance or disturbance.

4.3.4 This policy recognises the use of registered Door Supervisors All Door Supervisors will be licensed by the Security Industry Authority. Mobile security units and similar systems are in use by some premises operators as a means of providing security cover at very short notice at premises which may not normally require a permanent security presence. This policy endorses the use of units following such guidance and standards in appropriate circumstances.

4.3.5 The development of codes of practice and general operating standards for security companies is encouraged for local businesses; premises operators are urged to ensure that security services, when engaged, are provided by suitably qualified businesses operating to recognised standards and who should be working towards SIA accreditation.

4.3.6 Enforcement will be achieved by the enforcement policy appended (Appendix B).

## **6 Prevention of Public Nuisance**

The following details and measures are intended to address the need for the prevention of public nuisance which may be associated with licensed premises and certificated club premises:

6.1.1 In determining applications for new and varied licences, regard will be had to the location of premises, the type and construction of the building and the likelihood of nuisance and disturbance to the amenity of nearby residents by reason of noise from within the premises, as a result of people entering or leaving the premises or from individuals or groups of customers gathered outside (eg in order to smoke).

6.1.2 Applications for new licences or for the extension in size of licensed premises

should not normally be granted if the premises will use amplified or live music and operate within or abutting premises containing residential accommodation except that occupied by staff of the licensed premises. A condition may be imposed on new licences that entertainment noise shall be inaudible in any residence. Noise emanating from within licensed premises should not normally be audible outside.

6.1.3 Installation of sound limiting equipment and sound insulation may be required to minimise disturbance to the amenity of nearby residents by reason of noise from the licensed premises.

6.1.4 Generally, regulated entertainment in the open air including tents and marquees should have a maximum closure hour of 2300. Earlier hours may be imposed in sensitive open spaces or near residential areas. The Licensing Authority will have regard to Noise Council guidance.

6.1.5 In determining applications for new licences or extensions in hours or terminal hours of licensed premises, regard will be had to late night public transport availability and location of taxi ranks to aid dispersal of customers.

6.1.6 Reasonable controls are available to all premises operators to minimise the impact of noise from customers outside. The council's Environmental Health Department has issued guidance on a number of steps that can be taken in this respect which are endorsed by this policy (see 6.2 below).

## 6.2 Smoking Advice

### 6.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on your premises and ensure that all staff are aware of the contents of this plan, and that it is effectively implemented. Noise from people smoking and talking can be intermittent, vary in character and volume and be intrusive. An effective smoking management plan will help prevent neighbours being disturbed.
- Comply with any planning conditions restricting the use of outdoor areas.
- Ensure that any structures used by smokers comply with the design criteria detailed in the Heath Act 2006 and that any structures, awnings, retractable canopies, etc. have the relevant planning permission.
- Ensure any new lighting to outdoor areas must be designed so as not to cause a light nuisance to neighbours and again have the relevant planning permission and building control consent.
- Ensure that the conditions on the premises licence are complied with. There may be conditions restricting the hours of use of gardens and outdoor areas. Having reviewed the contents of the premises licence you may find it necessary to request a variation of your licence.
- Licence tables and chairs on the Public Highway under the provisions of the Highways Act 1980. These licences may have conditions restricting the times that the area can be used.
- Ensure drinks, glasses and bottles are not taken onto the highway unless there is a tables and chairs licence permitting use. A system should be adopted to prevent theft and 'spiking' of drinks and reminding customers not to leave unattended items.
- Discourage smokers remaining in gardens and outdoor areas and determine terminal hours.
- Discourage smokers remaining outside by removing/disabling tables and chairs or prohibiting their use after a certain time. Lights and heaters will also be turned off.
- Introduce a system that after a certain time the number of smokers outside are restricted to a maximum number. Staff will be needed to manage this restriction.
- Employ staff and/or SIA registered door supervisors to manage doors and control customers and smokers entering and leaving the premises. Staff positioned on the doors can help to encourage customers not to cause a noise problem. It may be that staff are required to manage doors after a certain time, particularly during the hours when neighbouring residents are trying to sleep.
- Ensure door supervisors maintain order outside venues and protect customer safety. BCRP supports the use of Night Safe. Radio net and other pager systems and pub watch schemes can be used to provide for rapid police response and alert other venues where customers and staff are endangered.

- Position signs to remind customers that the premises is in an area where people live. It is not always obvious in busy commercial streets with flats above. By changing the design and wording of signs customers do not forget. Signs can be located in and outside the premises and on tables.
- Use CCTV to manage outside areas.

6.2.2 Licensed premises should normally display prominent, legible signs at exits reminding customers to leave in a quiet, peaceful, orderly manner.

## **8 Integration of Strategies**

8.1.1 The licensing authority shall secure the proper integration of this policy with local crime prevention, planning policy, transport, tourism and cultural strategies by:-

- Liaising and consulting with the Sussex Police, Community Safety Forum, Sustainability Commission representatives and following the guidance in community safety and crime and disorder strategy
- Liaising and consulting with Public and Alcohol Programme Board
- Liaising and consulting with the East Sussex Fire & Rescue Service
- Liaising and consulting with the Local Strategic Partnership, Safety Advisory Group (Emergency Planning) and Equalities and Social Justice Consultation Forum
- Liaising and consulting with the Planning authority
- Liaising and consulting with the Highways authority
- Liaising and consulting with local business and business associations. Having regard to any future documents issued relating to the Private Security Industry Act 2001, for example liaison or information sharing protocols
- Liaising and consulting with the Trading Standards Team, for example with regard to test purchasing codes of practice

8.1.2 In line with statutory requirements and the council's Inclusion Policy, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds, for example communities of interest such as: lesbian, gay, bisexual and transgender people; disabled people; racial and ethnic groups; religious and faith groups.

8.1.3 This policy supports the aims of the tourism strategy, recognising the benefits for the tourism economy of creating a safer and more attractive city centre and improving competitiveness with other European cities. The Licensing Committee should receive any reports relevant to the needs of the local tourist economy and the cultural strategy for the area to ensure that it considers these matters.

8.1.4 The Licensing Committee should receive relevant information relating to the employment situation of the area and the need for new investment and employment where appropriate.

8.1.5 Specific conditions may be attached to premises licences to reflect local crime

prevention strategies. Such conditions may include the use of closed circuit television cameras, use of the NightSafe radio system or accredited scheme, the provision and use of shatterproof drinking receptacles, drugs and weapons search policy, the use of registered door supervisors, specialised lighting requirements, hours of opening. Certificates issued to club premises shall reflect local crime prevention strategies and may include any or all of the requirements listed above.

8.1.6 The licensing authority will have regard to the need to disperse people quickly and safely from the city centre to avoid concentrations which may produce disorder and disturbance.

### **8.3 Enforcement**

8.3.1 The Enforcement of licensing law and inspection of licensed premises is detailed in the Protocol between Sussex Police, the East Sussex Fire & Rescue Service and Brighton & Hove City Council. This protocol reflects the need for more efficient deployment of Police and Local Authority staff commonly engaged in licensing enforcement and can be found at Appendix D (Lead Agency Status) of the Statement of Licensing Policy. In addition, the Licensing Authority will have regard to its published Licensing Enforcement Policy in making enforcement decisions in accordance with Brighton & Hove City Council's Statement of Licensing Policy (Appendix B). In order to better target enforcement resources, inspections will be undertaken outside of normal office hours and the sharing of information between all enforcement agencies will be encouraged through joint meetings or similar arrangements.

8.3.2 Attention is drawn to the targeting of agreed problem and high risk premises requiring greater attention as identified in the protocol. A number of other council and government policies, strategies and guidance documents must be taken into account to complement the policy, including:

- Community Safety & Crime Reduction Strategy
- Drugs and alcohol strategies – local alcohol harm reduction strategy
- Objectives of the Security Industry Authority
- The Anti-Social Behaviour Act 2003/ASBPC Act 2014
- The Health Act 2006
- The Violent Crime Reduction Act 2006
- Policing and Crime Act 2009

## **APPENDIX A – Licensing Best Practice Measures**

Best Practice Measures to be included for consideration, in particular in SSA: Matters that would normally be expected in operating schedules:

- the adoption of a policy (e.g. Challenge 25) with acceptable proof of ID as per existing Statement of Licensing Policy
- all off sales to be made in sealed containers for consumption away from the premises
- a smoking policy which includes an assessment of noise and litter created by premises users
- the use of plastic or polycarbonate drinking vessels and containers,

- especially in outside areas or after specified hours
- a policy in relation to searching customers and for drugs, weapons, seized or lost and found property
- use of a refusals book for registering attempts to buy alcohol by under-age persons or refusals to those intoxicated
- the installation of a digital CCTV system by liaison with, and to a standard approved by, Sussex Police
- policies for dispersal of customers which may include signage regarding taxi services' telephone numbers and advice to respect neighbours and minimize noise

Items to which positive consideration would be given:

- membership of Business Crime Reduction Partnership, Pubwatch, Neighbourhood Watch or similar schemes
- use of 'Night Safe' radio system or similar accredited scheme
- regular training and reminders for staff in respect of licensing legislation, policies and procedures; records of which should be properly recorded and available for inspection
- records of regular checks of all parts of the premises in relation to drug use
- systems in place to ensure details of barred clients are exchanged with other operators
- giving an agreed minimum notice of special events (screening of major sports events, birthday parties, adult entertainment, etc.) to relevant authorities and use of appropriate additional measures at such events

Recommend best practice for both on and off premises

- Staff must be aware of the risk of the problem of proxy sales and offer assistance to responsible authorities to deter offences
- Signage on premises should set out legal duties
- Voluntary restriction of high strength alcohol – operating schedules may be used to limit high ABV beers and ciders
- Staff training – in addition to personal licence holders training, staff must be adequately trained for duties
- Challenge 25 would be the norm, particularly in the off licence trade
- Signage – proxy sale – deterrence

## **5. FINANCIAL & OTHER IMPLICATIONS:**

### Financial Implications:

- 5.1 The licensing Act 2003 provides for fees to be payable to the licensing authority in respect of the discharge of their functions. The fee levels are set centrally at a level to allow licensing authorities to fully recover the costs of administration, inspection and enforcement of the regime.

*Finance Officer Consulted John Lack*

*Date: 25/07/25*

### Legal Implications:



5.2 The licensing authority must act to promote the four licensing objectives which are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

The licensing authority must have regard to its statement of licensing policy and the guidance issued by the Secretary of State in carrying out its functions.

*Lawyer Consulted: Rebecca Sidell*

*Date: 25/07/25*

Equalities Implications:

5.3 Diversity is valued and strong, safe communities are vital to future prosperity. Licensing policy aims to protect children from harm including sale and supply of alcohol to children.

Sustainability Implications:

5.4 Licensing policy aims to prevent public nuisance and develop culture of live music, dancing and theatre.

**SUPPORTING DOCUMENTATION**

**Appendices:**

1. Appendix A – Section 18 of the Application and Dispersal Policy
2. Appendix B – New Plan of Premises
3. Appendix C – Representations and Sussex Police agreed conditions
4. Appendix D – Map of area

**Documents in Members' Rooms**

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2021.

Home Office, Revised Guidance issued under section 182 of the Licensing Act 2003, February 2025.

Public Health Framework for Assessing Alcohol Licensing – January 2022.

**Background Documents**

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2021.



## Appendix A

<b>Section 18 of 21</b>
<b>LICENSING OBJECTIVES</b>
Describe the steps you intend to take to promote the four licensing objectives:
a) General – all four licensing objectives (b,c,d,e)
<p>The Applicant shall operate their cafe bar in a responsible way and actively promote the Licensing Objectives at all times. On sales of alcohol shall be available to seated customers with or without food with all service by staff with a food offer available. Off sales of alcohol shall be available for customer collection or home delivery with a substantial food order. The premises is not located in the CIA but is within the Brighton Special Stress Area. The Applicant has requested trading hours that are within those traditionally enjoyed by cafe bars and are not excessive. A full list of robust conditions have been offered to ensure the Licensing Objectives are fully promoted and that the business does not increase the problems in the SSA.</p>
b) The prevention of crime and disorder
<p>1) a) The premises licence holder shall ensure that a CCTV system is installed in the premises of a standard acceptable to Sussex Police. The system shall be maintained in good working order &amp; fully operational covering all internal and external areas of the premises to which the public have access. All entry and exit points shall be covered enabling frontal identification (full head and shoulders images), of every person entering the premises in any light condition to an evidential standard.</p> <p>b) All staff shall be fully trained in the operation of the CCTV system including the ability to download screenshots and CCTV footage for Police or Authorised Officers on request. A minimum of one such member of staff fully trained in the operation of the CCTV system shall be on duty at all times that the premises are open to the public.</p> <p>c) The CCTV system shall have the capability to either download footage onto a disk or memory stick. The footage of the CCTV system shall be retained for a minimum period of 31 days before re-writing itself with the correct date and time showing. Screenshots and CCTV footage shall be made available to Police or Authorised Officers immediately upon request provided that it is requested further to the prevention or detection of crime and disorder.</p> <p>d) If the CCTV system is faulty the premises licence holder shall notify the Licensing Authority and Police Licensing Team as soon as possible and get the fault rectified as soon as practicable.</p> <p>e) The premises licence holder shall ensure that a log is kept in the Incident Book with the dates &amp; the details of all work / repairs carried out on the CCTV system including the name and phone number of the engineer.</p> <p>f) On a minimum daily basis the premises licence holder / DPS shall check that the CCTV system is operational and the date and time stamp are correctly set and on a minimum of a weekly basis, check that the CCTV system is also correctly recording images for a minimum of 31 days and that screenshots and footage can be correctly downloaded. Details of these checks shall be recorded in the appropriate section of the Incident Book.</p> <p>2) The sale of alcohol for consumption on the premises shall only be by waiting staff to seated customers. No vertical drinking including at the bar / servery shall be permitted.</p> <p>3)a) Off sales of alcohol shall only be permitted to accompany a substantial order of food for customer collection or home delivery and shall be limited to 8 (eight) cans or bottles of beer, lager or cider and or 2 (two) bottles of wine per order.</p> <p>3b) No glasses, bottles, or drinks shall be removed from the premises, including the external tables &amp; chairs, at any time except as permitted under conditions 3) or 4).</p> <p>4) Customers shall be permitted to take home a part consumed bottle of wine provided it is corked or otherwise sealed.</p> <p>5) An Incident Book shall be kept at the premises for at least 12 months, and made available on request to Police Officers or Authorised Officers which shall record the following:</p> <p>(a) all crimes reported to the premises, or by the premises to Police;</p> <p>(b) all ejections of patrons,</p> <p>(c) any incidents of disorder,</p> <p>(d) any complaints received and the outcome,</p> <p>(e) any seizure of drugs or offensive weapons,</p> <p>(f) any failures or faults with the CCTV system as required by condition 1)e),</p> <p>g) Any visits by Police or other Emergency Services. Where Police are called the CAD number shall be obtained and recorded in the Incident Book.</p> <p>6) Front of house staff shall be trained on induction and given refresher training at a minimum of six monthly intervals for their role, including in the operation of the CCTV system &amp; downloading screenshots &amp; images &amp; the operation of Challenge 25. Training shall include identifying persons under 25, making a challenge, acceptable proof of age and checking it, making and recording a refusal, avoiding sales to intoxicated persons or those under the influence of illegal drugs, avoiding proxy sales, avoiding conflict, responsible alcohol retailing, preventing drink spiking, the Dispersal Policy and safeguarding children, vulnerable people, girls &amp; women including WAVE Training where available. Written training records shall be kept</p>

<p>for each member of staff.</p> <p>7) Relevant Notices shall be prominently displayed by the entry/ exit door and bar / servery (as appropriate) advising customers:</p> <p>a) That CCTV &amp; Challenge 25 are in operation;</p> <p>b) Advising customers of the provisions of The Licensing Act regarding underage and proxy sales;</p> <p>c) Of the permitted hours for licensable activities, last order times &amp; the opening times of the premises;</p> <p>d) That no drinks, bottles or glasses shall be removed from the premises (except as permitted under conditions 3 &amp; 4);</p> <p>e) To respect residents and leave the premises &amp; vicinity quietly and quickly, not to drink or loiter outside the premises and not to talk loudly when outside;</p> <p>f) That no more than six (6) smokers at a time shall be permitted in the smoking area outside the premises at any time.</p> <p>8) From the end of permitted licensed hours and throughout the consumption period and until all customers have left the premises, the member of staff tasked for the purpose shall take a proactive role and stand on the exit door asking customers to leave the premises and area quietly and as quickly as possible. The nominated Staff Member shall ensure that customers do not take any bottles, glasses or drinks from the premises when departing (except as permitted under conditions 3 &amp; 4) and monitor the frontage to ensure people do not loiter outside. (See also Condition 10) below.)</p> <p>9) The premises licence holder or DPS shall undertake an ongoing daily risk assessment, taking into account any local events taking place or advice received from Sussex Police to identify adequate staffing levels &amp; any need for SIA Licensed Door Supervisors to be in attendance.</p> <p>10) Only toughened glasses, polycarbon glasses or plastic glasses shall be used at the outside tables &amp; chairs.</p>
<p>c) Public safety</p> <p>A Fire Risk Assessment &amp; Emergency Plan shall be prepared &amp; regularly reviewed. All staff shall receive appropriate fire safety training.</p>
<p>d) The prevention of public nuisance</p> <p>1) Relevant Notices shall be prominently displayed by the entry / exit door and bar / servery as appropriate – (see section B Prevention of Crime &amp; Disorder Condition 7 for full details).</p> <p>2) No deliveries shall be received or rubbish including bottles or glass removed from the premises between 20.00 &amp; 07.00.</p> <p>3) Doors and windows shall be kept closed during musical entertainment except for entry and egress.</p> <p>4) No music shall be audible at the boundary of any noise sensitive premises.</p> <p>5) The area outside of the premises shall be kept tidy at all times and be swept at close.</p> <p>6) A phone number shall be prominently displayed for residents to contact the business with any concerns. Details of any complaints received &amp; actions taken by the management shall be included in the Incident Book.</p> <p>7) Staff shall ensure that no more than six (6) customers go outside the premises to smoke at any time and that they do not take drinks, bottles or glasses outside. (See also Section B Condition 10.)</p> <p>8) A Dispersal Policy shall be prepared and regularly reviewed. The provisions of the Dispersal Policy shall be included in staff training and staff shall be tasked to implement it.</p>
<p>e) The protection of children from harm</p> <p>1) Relevant Notices shall be prominently displayed by the entry / exit door and bar / servery as appropriate – (see section B Prevention of Crime &amp; Disorder Condition 7 for full details).</p> <p>2) The premises shall implement a "Challenge 25" policy whereby all customers who appear to be under 25 shall produce credible photographic identification in the form of a passport, photographic driving licence, UK Armed Forces identity card or Proof of Age Scheme (P.A.S.S) card with the PASS hologram on it before alcohol can be purchased.</p> <p>3) A written refusals record shall be kept as part of the Incident Book detailing all refused sales of alcohol. The refusals record shall include the date and time of the refused sale, brief description of the customer &amp; what they attempted to purchase, the reason for refusal and the name of the member of staff who refused the sale. The Incident Book shall be available for inspection at the premises by the Police or Authorised Officers at all times whilst the premises is open.</p> <p>4) No unaccompanied children under 16 shall be permitted on the premises after 20.00.</p> <p>5) No child or young person under 18 shall be permitted to consume alcohol on the premises at any time.</p>

## Dispersal Policy

**Loro`s Café, 66/68 Lewes Road, Brighton, BN12 3HZ**

1) It is recognised by the Premises Licence Holder that during permitted licensed hours it is vital that the Licence hours and conditions are strictly observed. The management & staff, including SIA Licensed Door Supervisors when on duty, must work in close liaison with each other to achieve this.

2) An A4 size notice shall be prominently displayed by the exit door(s) reminding customers to respect nearby residents, to leave the premises and area quietly and as quickly as possible, not to take drinks, bottles or glasses outside Loro`s Cafe at any time and not to loiter outside the premises or in the area.

3) From the end of permitted licensed hours, throughout the consumption period and until all customers have left Loro`s Cafe, staff, including SIA Licensed Door Supervisors when on duty, shall politely encourage customers to leave Loro`s Cafe and make their way home.

4) From the end of permitted licensed hours and throughout the consumption period and until all customers have left the premises, the member of staff tasked for the purpose, including SIA Licensed Door Supervisors when on duty, shall take a proactive role and stand on the exit door(s) asking customers to leave the premises quietly and as quickly as possible. The nominated Staff Member shall ensure that customers do not take any bottles, glasses or drinks from the premises when departing and monitor the frontage to ensure people do not loiter outside.

5) Staff, including SIA Licensed Door Supervisors when on duty, shall monitor the outside of Loro`s Cafe by CCTV and physical checks to ensure that customers outside smoking do not make excessive noise, that a maximum of 6(six) smokers are allowed outside smoking at any time and to ensure that bottles, glasses or drinks are not permitted to be taken outside the premises at any time.

6) A notice shall be displayed by the exit door(s) advising customers that no more than 6 (six) smokers shall be permitted outside at any one time

7) A notice shall be displayed in Loro`s Cafe and by the exit door(s) advising customers that staff will call a cab for anyone wanting one and if it is within permitted opening hours, the customer(s) should be asked to remain inside the premises pending the arrival of the cab.

The cab firm shall be asked to instruct their drivers to ring Loro`s Cafe or their passenger(s) on arrival or go into the premises to notify their passenger(s) of their arrival and not sit outside playing loud music or blowing their horns.

(Customers shall of course also be capable of calling a cab from Uber or Bolt and if within permitted opening hours, the customer(s) should be asked to remain inside the premises pending the arrival of the cab.)

8) A notice shall be prominently displayed by the exit door(s) reminding customers who drove to Loro`s Cafe to respect residents and not to bang car doors, play loud music, rev engines or blow horns.

9) The member of staff tasked for the purpose, including SIA Licensed Door Supervisors when on duty, shall proactively implement the Dispersal Policy, aid in the dispersal of customers from the premises and area from the terminal hour and throughout the closing period until all customers have left the premises and area. They should politely ask anyone who lingers to leave the area quietly & as quickly as possible.

10) Staff, including SIA Licensed Door Supervisors when on duty, monitoring departing customers should monitor their behaviour when outside to ensure that customers do not endanger themselves or other road users when crossing the nearby roads.

11) The nominated member of staff, including SIA Licensed Door Supervisors when on duty, should direct customers away from residential properties towards nearby bus stops.

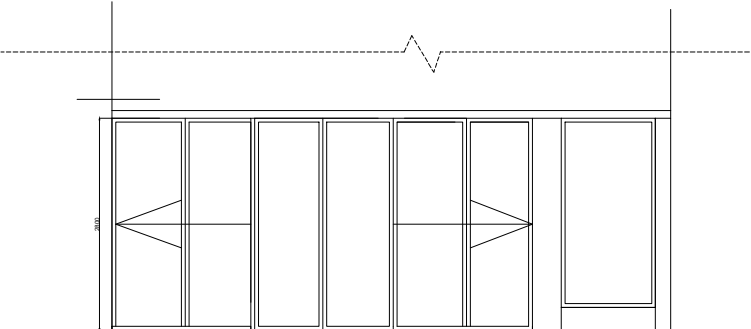
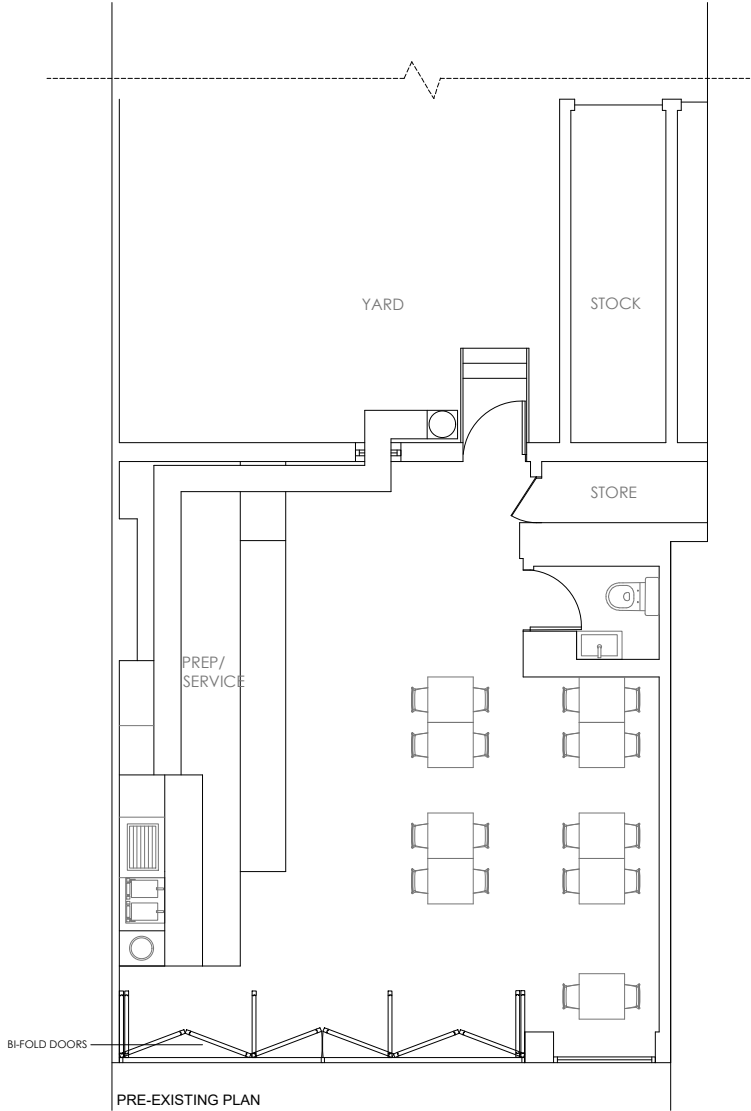
**Signed for Loro`s Cafe**

**Date 07/06/25**

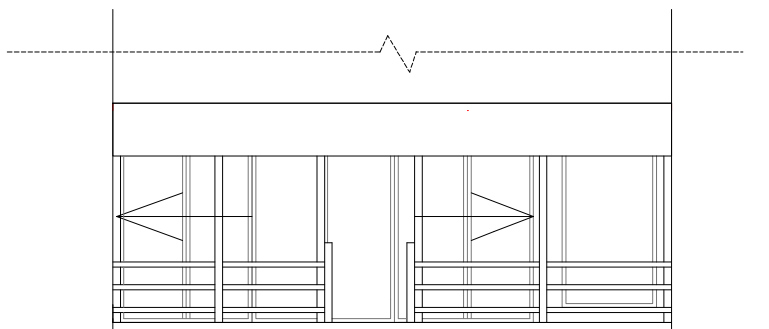
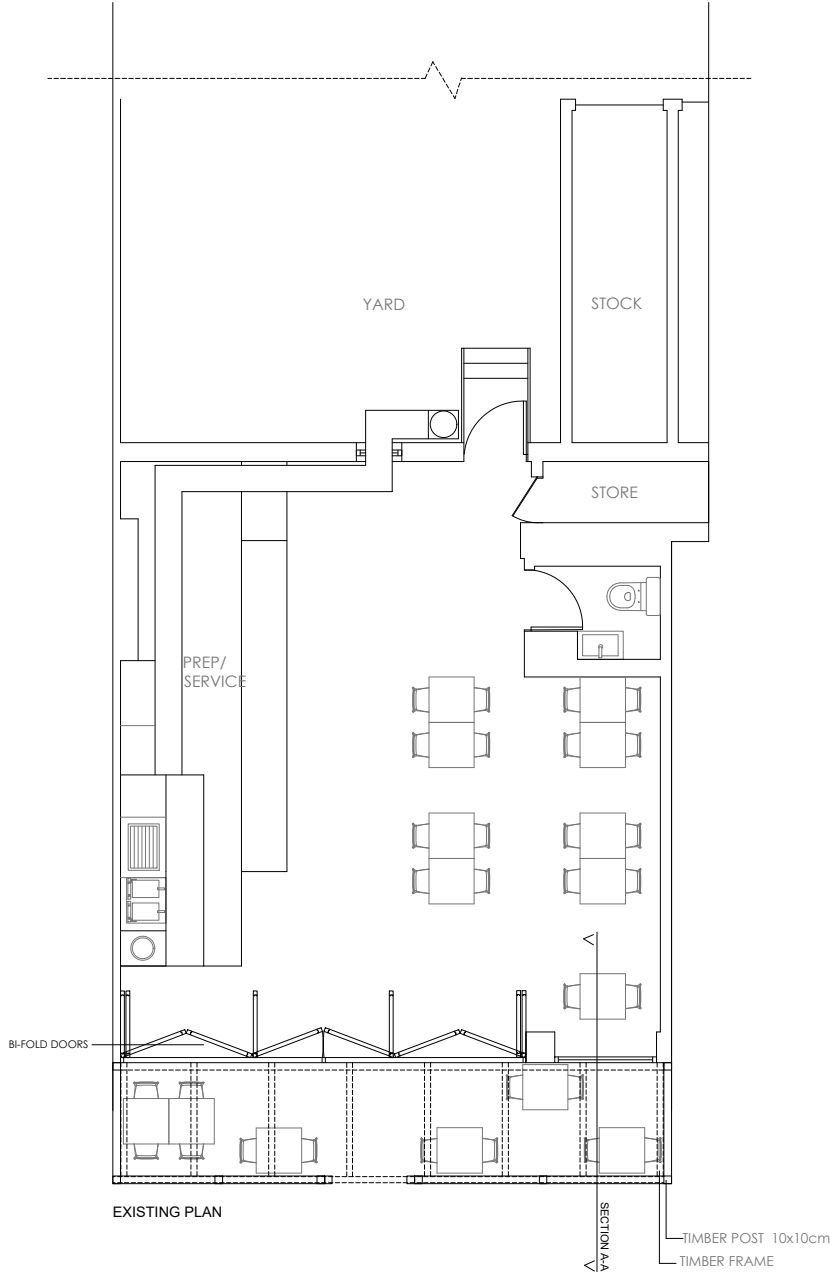
**Drafted by Graham Hopkins**

**GT Licensing Consultant**

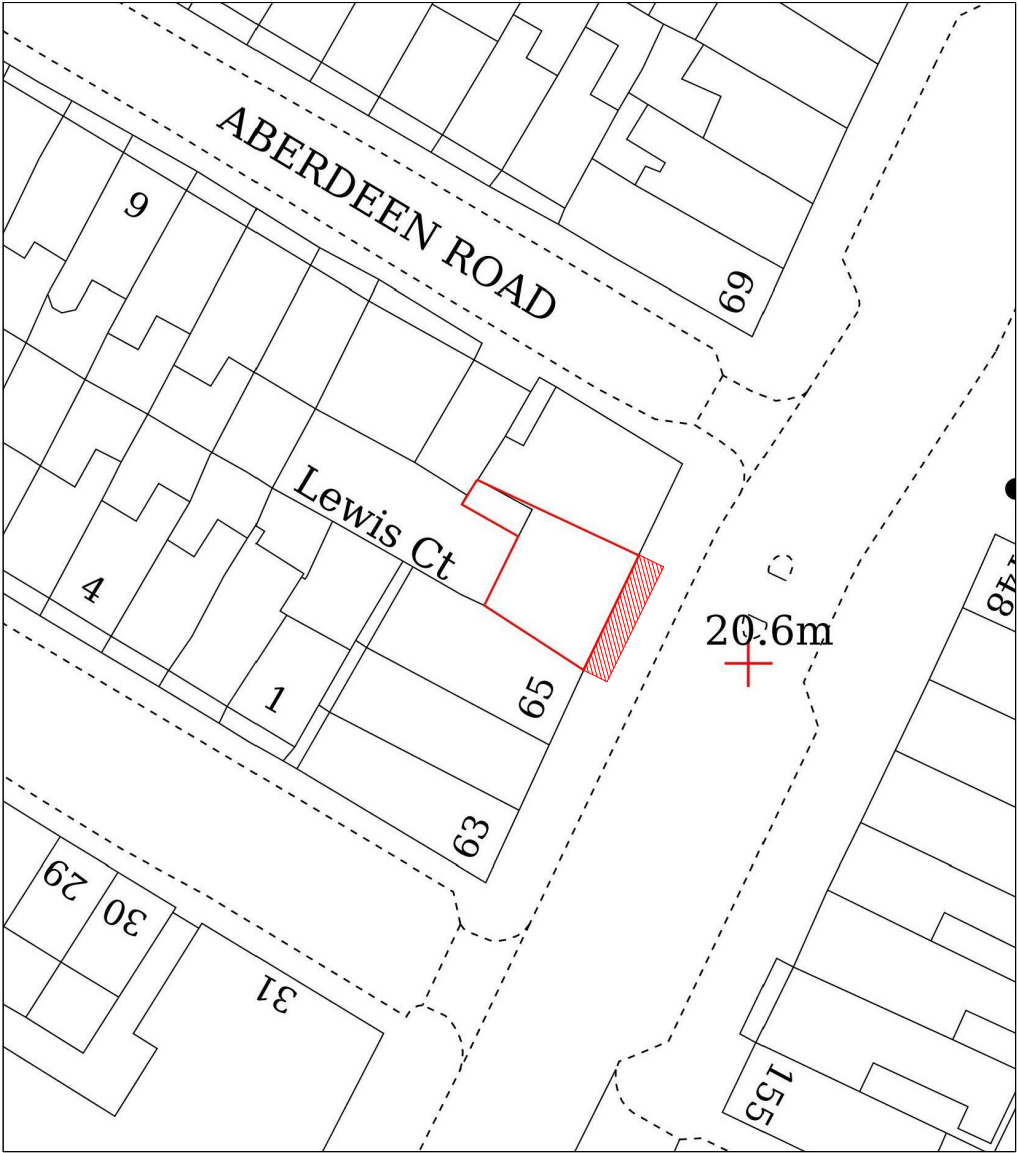
APPENDIX B



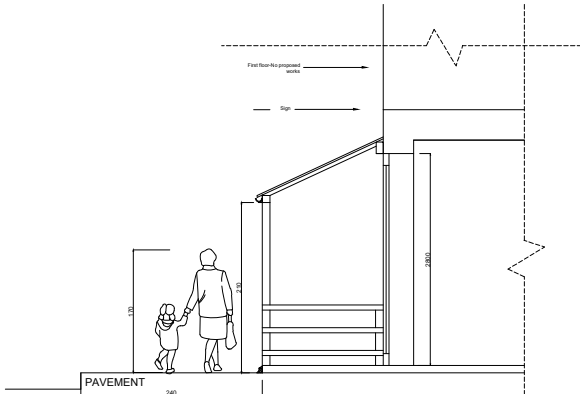
PRE-EXISTING ELEVATION / LEWES ROAD



EXISTING ELEVATION / LEWES ROAD



LOCATION PLAN 1/500

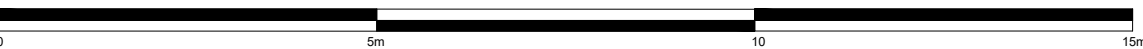


PROPOSED SECTION A-A

66 LEWES ROAD,  
BRIGHTON,  
BN2 3HZ

DETAIL  
PRE-EXISTING AND  
EXISTING FLOOR  
PLAN AND  
ELEVATION AND  
SECTION

1:100 @ A3



MAY 25'

PROJECT NO.  
SO25/11  
DWG NO.  
01

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ARCHITECTURAL SERVICES





REP A

CH CON ENDS 11.07.2025 VALID PPN

**From:** [REDACTED]  
**Sent:** 27 June 2025 09:35  
**To:** EHL Licensing <[ehl.licensing@brighton-hove.gov.uk](mailto:ehl.licensing@brighton-hove.gov.uk)>  
**Subject:** OBJECTION to New Premises Licence Application – Loro's Café, [8c Lewes Road, Brighton, BN2 3HZ](#)

Dear Sir/Madam,

I am writing to formally object to the application for a new premises licence by Ms Florent Gjinaj for Loro's Café at [66 Lewes Road, Brighton, BN2 3HZ](#). The application seeks to permit the sale of alcohol for consumption on and off the premises from 11:00 to 23:00 daily, all week.

My objection is based on the following grounds, which relate to the prevention of public nuisance:

---

### Noise from Customers Leaving Late in the Evening

The proposed licensing hours, extending until 23:00, will inevitably lead to increased noise levels late in the evening from customers leaving the premises. This area, being densely populated with many flats and houses immediately adjacent to and backing onto the premises, is particularly sensitive to noise disturbance. Even general chatter, laughter, and car doors closing, which may seem minor individually, cumulatively create significant disruption to residents' peace and quiet, especially during later hours when people are trying to sleep. This will detrimentally affect the amenity of our residential neighbourhood.

---

### Noise from Extractor Fan and Chimney

The premises' existing extractor fan and chimney at the rear already generate a noticeable level of noise during current business hours. Given the close proximity of numerous residential properties directly backing onto Loro's Café, this noise is clearly audible within homes. Should the premises operate until 23:00, as proposed, the continuous operation of this equipment into the late evening would be utterly intolerable, particularly during the summer months when residents frequently have their windows open for ventilation. This persistent mechanical noise would constitute a severe public nuisance and significantly diminish the quality of life for those living nearby.

---

## **Traffic and Obstruction from Delivery Drivers**

Delivery drivers already park on the double yellow lines at the side of Subway, opposite the side of Bocana. The granting of this licence would likely increase the number of food delivery drivers, many using large cars, exacerbating existing parking problems. This will not only add to traffic congestion on our narrow residential street but also significantly hinder access for emergency services, posing a serious risk to public safety.

---

I urge the Licensing Authority to seriously consider these points, as the granting of this licence with the proposed hours would undoubtedly lead to an unacceptable level of noise pollution, public nuisance, and traffic issues for local residents.

Thank you for your time and consideration of my objection.

Yours faithfully,

[Redacted signature]

[Redacted address]

**REP B**

**CH CON ENDS 11.07.2025 VALID PCD & PPN**

**Corinne Hardcastle  
Licensing Officer  
Licensing Team  
Brighton & Hove City Council  
Bartholomew House  
Bartholomew Square  
Brighton, BN1 1JP**

Date: 11<sup>th</sup> July 2025

Our Ref: LICSIJC

Phone: 07772306953

Email: [REDACTED]

Dear Mrs Hardcastle

**Re: Licensing Act 2003 - Representation regarding the application for a New Application for a Premises Licence For: Loro`s Cafe, 66 Lewes Road, Brighton, BN2 3HZ**

I refer to the application made by Florenc Gjona, for a new Premises Licence to be issued for the above premises. The Licensing Team, in its role as a Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the prevention of crime & disorder and public nuisance and to uphold our Statement of Licensing Policy (SoLP).

The applicant has applied for a Premises Licence for alcohol for consumption on & off the premises every day 11am – 11pm and opening hours of 7:00am – 11.30pm.

This representation is submitted as there are concerns that the premises is within the Special Stress Area of the city, that can be found in our Statement of Licensing Policy (SoLP) from page 15. The Special Stress Area is of concern to the Licensing Authority because of the relatively high levels of crime and disorder and nuisance experienced within it and we believe that the granting of this application could lead to increased associated issues with regard to crime & disorder and public nuisance in the nearby surrounding area.

The Council's SoLP includes a Matrix Model approach for licensing decisions, which recognises the diverse operation and different risks presented by different classes of licensed premises. It provides a vision of what the licensing authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications.

The Matrix Model, on page 18 of the Council's SoLP, states that in the Special Stress Area, cafes could be granted until 10pm. The policy does state that each application is still considered on its individual merit and there is discretion to depart from the policy where justified. However, departure from the Matrix Model is only expected in exceptional circumstances.

I have seen the agreement the applicant has made with the Police and agreed conditions therein but in light of the above and the fact that this new premises falls within our Special

Stress Area, I invite the Sub-Committee Panel to decide the outcome of this application on behalf of the Licensing Authority and whether the applicant has demonstrated whether there are exceptional circumstances to depart from our policy.

Yours sincerely



Sarah Cornell  
Senior Licensing Officer  
Licensing Team  
Regulatory Services

## **Sussex Police Agreed Conditions – Loro's Café – Café Style Licence**

### **General:**

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.
2. The on sale of alcohol shall be consumption by persons seated at tables via waiter/waitress service with no vertical drinking.
3. Substantial food shall be available at all times that alcohol is offered for sale on these premises.
4. Alcohol is ancillary to other hot and cold non-alcoholic beverages available on the premises.
5. At all times, food menus must be clearly displayed within the premises and include hot food options.
6. When in use the outside terrace area will be monitored by staff to ensure compliance to the licence conditions.
7. Off-sales of alcohol will only be permitted when it forms part of a substantial food order made over the telephone or app/website and delivered to a private or work address. i.e. walk-ins for off sales of alcohol are not permitted.

Additionally, as offered up in the original application or agreed with another responsible authority.

### **Prevention of crime and disorder:**

8. Subject to GDPR guidance and legislation:
  - (a) Digital CCTV and appropriate recording equipment to be installed in accordance with Home Office Guidelines relating to UK Police Requirements for Digital CCTV System (PSDB Publication Number 09/05), operated and maintained throughout the premises internally and externally to cover all public areas, including the entrances/exits to the premises as well as any outside space. The system shall be on and recording at all times the premises licence is in operation.
  - (b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.
  - (c) CCTV footage will be stored for a minimum of 31 days
  - (d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.

(e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.

(f) The management of the premises will ensure that key staff are fully trained in the operation of the CCTV, and will be able to download selected footage onto a disk (or other electronic portable device acceptable to Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

(g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - [brighton.licensing@sussex.police.uk](mailto:brighton.licensing@sussex.police.uk)

(h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Police or for any other reason, the premises will be expected to install a replacement hard drive or a temporary replacement drive as soon as practicable.

9. When alcohol forms part of a delivery order, all delivery drivers / riders shall be required to remove helmets and or face coverings whilst picking up items for delivery (excluding any face coverings worn for faith religious reasons) within an area that is covered by CCTV.
10. (a) An incident and refusals log (book or electronic) will be maintained by the premises showing a detailed note of incidents and refusals that occur in the premises. The logs will be inspected and signed off by the Designated Premises Supervisor (or a person with delegated authority) at least once a month.
- (b) The logs should be kept on the premises for at least twenty-four (24) months and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence. Refusals of alcohol for reasons such as underage, no ID and intoxication.

Additionally, as offered up in the original application or agreed with another responsible authority.

**Public safety:**

As offered up in the original application or agreed with another responsible authority.

**Prevention of public nuisance:**

11. The management will ensure that delivery riders / drivers waiting or arriving to collect food orders will be parked/waiting legally and not causing a public nuisance by way of obstructing the highway or footpaths.

As offered up in the original application or agreed with another responsible authority.

**Protection of children from harm:**

12. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face

discussion session. This training will take place prior to the selling and or serving of such products and will include:

\*The lawful selling of age restricted products:

Including but not limited to, the requirement for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place.

\*Refusing the sale of alcohol to a person who is drunk

(b)Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 8 weeks, with the date and time of the verbal reinforcement/refresher training documented.

(c)All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

13. The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.
14. Signage advertising the "Challenge 25" policy will be displayed in prominent locations in the premises.
15. In relation to deliveries where alcohol forms part of the order, the premises licence holder will ensure that an age verification policy will apply whereby all 3rd party delivery contractors will ensure that couriers are trained to ask any customer to whom alcohol is delivered to and who appears to be under the age of 25 years, to produce photo ID before being handed the alcohol. Identification being as listed under condition xx.

**From:** Brighton Licensing <Brighton.Licensing@sussex.police.uk>  
**Sent:** 09 July 2025 14:42  
**To:** Corinne Hardcastle REDACTED EHL Licensing <ehl.licensing@brighton-hove.gov.uk>  
**Subject:** FW: FW: Loro's Cafe, Lewes Road, Brighton

Dear Corinne & EHL,

Re the email trail below, we have come to an agreement on conditions and restricting the off sales.

Based on this we have no representation to make against this application.

Kind Regards

Mark.



**Mark Thorogood**  
Police Licensing Officer  
Level 4 PALO Qualification

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

**From:** GRAHAM HOPKINS  
**Sent:** 09 July 2025 10:12  
**To:** Brighton Licensing ; EHL Licensing  
**Subject:** Re: FW: Loro's Cafe, Lewes Road, Brighton

Good morning again Mark,

I have just spoken to Mr Gjona the Applicant and he accepts the Police worded conditions in full and has already accepted the Police proposed off sales conditions. I hope that will avoid a Police representation. Thank you again.

Kind regards,

Graham Hopkins  
GT Licensing Consultants REDACTED



## Appendix D

