

Licensing Panel (Licensing Act 2003 Functions)

Date: **1 August 2025**

Time: **11.30am**

Venue **Virtual**

Members: **Councillors:** Hewitt, McGregor and Parrott

Contact: **Francis Mitchell**
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AGENDA

PART ONE

Page

1 TO APPOINT A CHAIR FOR THE MEETING

WELCOME & INTRODUCTIONS

2 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.

3 FLAMES KEBAB & PIZZA LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

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Contact Officer: Charles Boufrahi
Ward Affected: Preston Park

**4 HOVE PIZZA PLAICE LICENSING PANEL (LICENSING ACT 2003
FUNCTIONS)**

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Contact Officer: Charles Boufrahi
Ward Affected: Westbourne & Poets' Corner

Date of Publication - Thursday, 24 July 2025

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FURTHER INFORMATION

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

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Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:	Application for a Variation of a Premises Licence under the Licensing Act 2003
Premises:	Flames Kebab & Pizza, 36 Preston Road, Brighton, BN1 4QF
Applicant:	Ebadullah Abid
Date of Meeting:	01 August 2025
Report of:	Corporate Director for City Operations
Contact Officer: Name:	Emily Fountain
Email:	Emily.fountain@brighton-hove.gov.uk
Ward(s) affected:	Preston Park

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a Variation of a Premises Licence under the Licensing Act 2003 for Flames Kebab & Pizza.

2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a Variation of a Premises Licence under the Licensing Act 2003 for Flames Kebab & Pizza.

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a Variation of a Premises Licence under the Licensing Act 2003. The application proposes ***“Application to vary a premises licence to extend the hours for the provision of late- night refreshment from the current 1.30am to 4.00am seven days a week.”***
- 3.2 Part M of the application is detailed at Appendix A. As well as a letter from the applicant that accompanied the application.
- 3.3 Summary table of existing and proposed activities

	Existing	Proposed
Late Night Refreshment	Every Day 23:00 - 01:30	Every Day 23:00 – 04:00
Hours premises are open to public	Every Day 17:00 – 01:30	Every Day 15:30 - 04:00

- 3.4 Existing licence attached at Appendix B.

- 3.5** 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

- 3.6** Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.7** 2 representations were received. They were received from Sussex Police and The Licensing Authority.
- 3.8** Representations received had concerns relating to Prevention of Crime and Disorder and Prevention of Public Nuisance.
- 3.9** Sussex Police submitted proposed conditions they would like to see attached should the application be granted. Environmental Protection agreed conditions with the applicant.
- 3.10** Full details of the representations and agreements 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

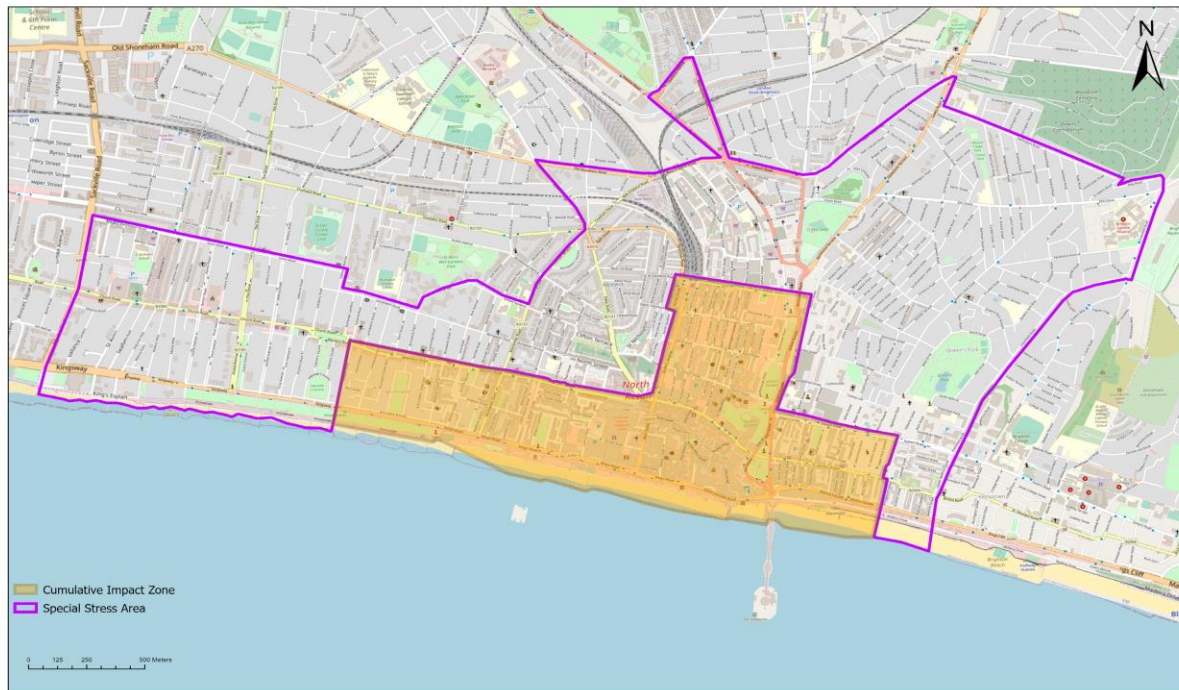
1.3.1 Licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events. Any conditions attached to various authorisations will be focused on matters which are within the control of individual licensees and others with relevant authorisations, i.e. 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)

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

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). 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 David Wilder

Date: dd/mm/yy

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: 23/07/25

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 – Part M of the Application and accompanying letter.
2. Appendix B – Part A of Premises Licence
3. Appendix C – Representations, Sussex Police Proposed Conditions and Environmental Protection 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) The prevention of crime and disorder / public safety

The CCTV is in operation throughout the premises.
Staff are trained in fire safety and emergency procedures.
Clear access is maintained at all times and fire safety equipment is regularly checked.

c) Public safety / The prevention of crime and disorder.

As a result of the premises having full CCTV coverage with 28 days recording retention, the licence holder holds an SIA Door Supervisory licence. Staff are trained to report incident and signage is in place to deter anti-social behaviour. Delivery drivers operate from the premises and are instructed to act responsibly and avoid disturbance.

d) The prevention of public nuisance

Delivery drivers are instructed to keep noise to a minimum. Staff monitor customer behaviour and signage remind customers to leave the area quietly.
Waste is managed responsibly to avoid nuisance.

e) The protection of children from harm

Children are not permitted on the premises late at night.
Staff are trained to follow age restrictions where relevant and no alcohol or age-restricted products are sold.

Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton BN1 1JP

Date: 12 June 2025

Dear Licensing Officer,

I hope this letter finds you well. I am writing as the leaseholder of Flames Kebab and Pizza, located at 36 Preston Road, Brighton, to formally request a variation of our premises licence to extend the hours for the provision of late-night refreshment from the current end time of 1:30 AM to 4:00 AM, seven days a week.

This application is submitted in response to sustained customer demand for hot food during the late-night period, particularly for takeaway and delivery services. Our business serves the local community, including shift workers, NHS staff, and late-night patrons who require access to safe, quality food in the early hours.

We are fully aware that Brighton & Hove City Council's Statement of Licensing Policy addresses cumulative impact and late-night trading. In recognition of this, we are committed to maintaining a responsible operating schedule that supports all four licensing objectives:

- Prevention of crime and disorder
- Public safety
- Prevention of public nuisance
- Protection of children from harm

To support this application, we have implemented the following measures:

- The premises is equipped with a fully operational CCTV system, covering all internal and external areas, with footage retained for a minimum of 28 days and made available to the relevant authorities upon request.
- I, the premises licence holder, hold a valid SIA Door Supervisor licence and have experience in managing late-night trading in compliance with licensing regulations.

- All staff are trained to a minimum of Level 2 in Food Hygiene and Safety for Catering and are instructed to report any incidents or suspicious behaviour.
- Clear signage is displayed to discourage anti-social conduct, and staff are briefed on how to maintain order during peak hours.
- If necessary, additional SIA-licensed door supervision will be arranged during busy periods to support the safe and orderly operation of the premises.
- Our delivery drivers operate directly from the site and are trained to behave professionally and avoid causing any noise or disruption while collecting orders.

No changes are proposed to the premises layout or to any other licensable activities.

Proposed Variation:

Activity	Current Hours	Proposed Hours	Days
Late Night Refreshment Mon–Sun	23:00 – 01:30	23:00 – 04:00	

Steps to Promote Licensing Objectives:

a. Prevention of Crime and Disorder:

- - CCTV installed inside and outside, footage retained for 28 days, available on request.
- Staff trained to report incidents and suspicious behaviour.
- Signage displayed to deter anti-social conduct.
- Premises licence holder holds a valid SIA Door Supervisor licence.

b. Public Safety:

- - All staff trained to Level 2 Food Hygiene and Safety.
- Appropriate fire safety equipment and emergency exits available.
- Staff trained in safe food handling and late-night service protocols.

c. Prevention of Public Nuisance:

- - Delivery drivers trained to avoid noise or disruption.
- Staff encourage customers to leave quietly.

- Responsible waste management and disposal.

d. Protection of Children from Harm:

- - No unaccompanied minors permitted late at night.
- Staff trained in Challenge 25 policy.
- No alcohol sold on-site.

We believe these controls demonstrate our full commitment to the licensing objectives and to ensuring our extended operating hours will not negatively impact the local community or contribute to cumulative impact. Our aim is to operate responsibly while continuing to provide a valuable service to the area.

I respectfully ask that you consider this application and advise on any further steps required to proceed.

Thank you for your time and attention.

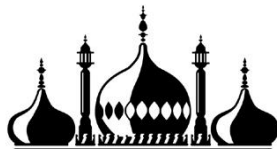
I look forward to your response.

Yours faithfully,

Ebadullah Abid

Premises Licence Holder

Flames Kebab and Pizza



Brighton & Hove City Council

Schedule 12

Part A

Regulation 33, 34

Premises Licence Brighton and Hove City Council

Premises Licence Number

1445/3/2025/02976/LAPRET

Part 1 – Premises Details

Postal address of premises, or if none, ordnance survey map reference or description, including Post Town, Post Code

Flames Kebab and Pizza
36 Preston Road
Brighton
East Sussex
BN1 4QF

Licensable activities authorised by the licence

Late Night Refreshment

Times the licence authorises the carrying out of licensable activities

Late Night Refreshment

Every Day 23:00 - 01:30

The opening hours of the premises

Every Day 17:00 - 01:30



Where the licence authorises supplies of alcohol whether these are on and / or off supplies
N/A

Part 2

Name, (registered) address, telephone number and email (where relevant) of holder of premises licence

Ebadullah Abid
REDACTED

Registered number of holder, for example company number, charity number (where applicable)

Registered Business Number: -

Name, address and telephone number of designated premises supervisor where the premises licence authorises for the supply of alcohol

N/A

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol

N/A



Annex 1 – Mandatory conditions

None

Embedded Conditions:

None

Variations to Embedded Conditions:

None

Annex 2 – Conditions consistent with the Operating Schedule

For the Prevention of Crime and Disorder:

None

For Public Safety:

1. The numbers of persons on the premises will be limited.

For the Prevention of Public Nuisance:

None

For the Protection of Children from Harm:

None

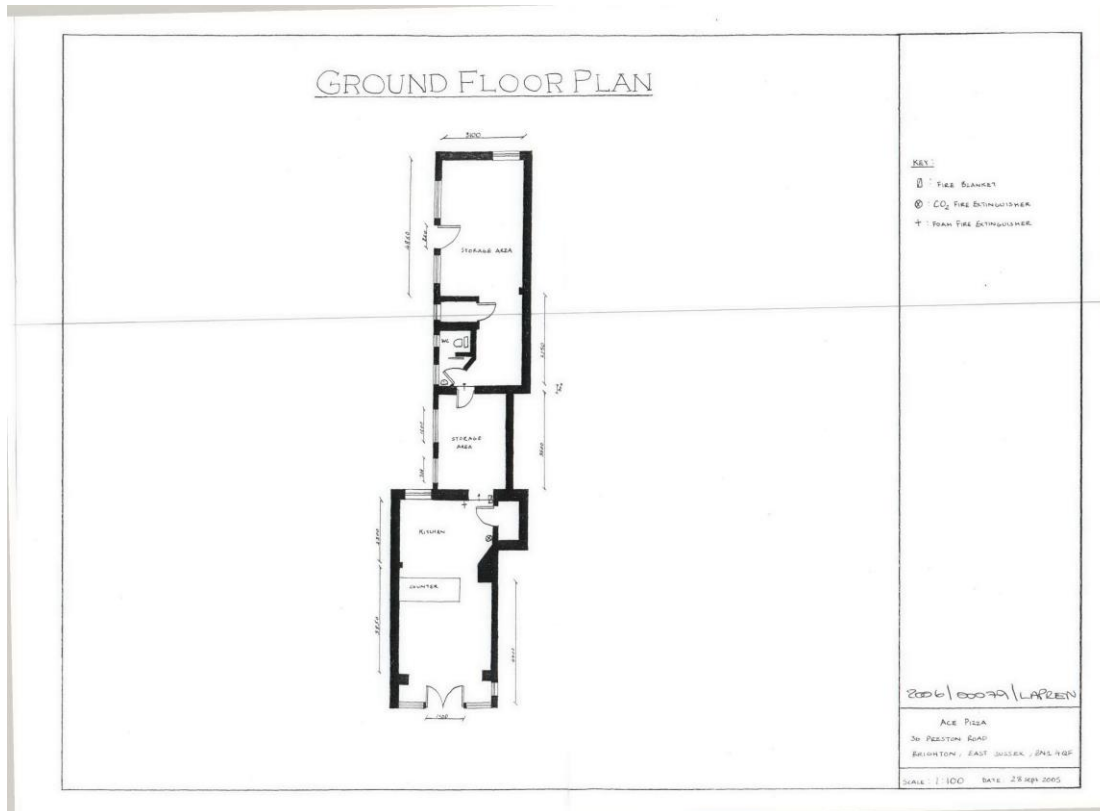
Annex 3 – Conditions attached after a hearing by the licensing authority

N/A



Brighton & Hove City Council

Annex 4 – Plans



REP A
EF CON ENDS 11.07.2025 VALID PCD & PPN



Police Station
John Street
Brighton
BN2 0LA
Tel: 01273 470101
www.sussex.police.uk

The Licensing Technical Support Officers
Environmental Health, Brighton & Hove City Council
Bartholomew House, Bartholomew Square
Brighton,
East Sussex,
BN1 1JP

Email: brighton.licensing@sussex.police.uk

09/07/2025

Dear Emily Fountain,

**RE: APPLICATION FOR A VARIATION OF THE PREMISES LICENCE FOR FLAMES
KEBAB & PIZZA, 36 PRESTON ROAD, BRIGHTON, EAST SUSSEX, BN1 4QF UNDER
THE LICENSING ACT 2003. 1445/3/2025/04771/LAPREV**

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the above variation application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy (revised January 2021) and the Revised Guidance issued under section 182 of the Licensing Act 2003 (February 2025).

This is a proposed variation to a premises licence in an area of the City which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Special Stress Area (SSA) (as defined in the BHCC Statement of Licensing Policy) and seeks to extend the licensable hours for late night refreshment.

The premises is currently licensed as follows:

Late Night Refreshment

Everyday: 23:00 – 01:30

Opening hours

Everyday: 17:00 – 01:30

They have applied to vary the licence to the following hours:

Late Night Refreshment (Indoors)

Everyday: 23:00 – 04:00

Find us on
social media





Applicant has ticked 'indoors' for where the provision of late-night refreshment will take place – this is believed to be an error as they make mention that they 'only serve hot food for takeaway and delivery', meaning that 'outdoors' is likely to be required as well.

Opening hours

Everyday: 15:30 – 04:00

Paragraph 3.2.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

"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."

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering hot food and drink into the early hours encourages persons who may be under the influence of alcohol or drugs to remain in the area, which is surrounded by residential flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be problematic.

The licensing decision matrix on page 18 of the Council Statement of Licensing Policy (SoLP) suggests that new premises or premises licence variations asking for these licensable activities and hours are a 'No'. While Paragraph 3.2.3 states that within the SSA *"applications will not be subject to the presumption of refusal"* it goes on to state that *"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"*.

The applicant did pre consult with Sussex Police via email and was advised that we would be unable to support their application (Please see Appendix 1). They were given advice and asked questions around potential conditions to consider as well as local issues and some of this has been addressed within their application and cover letter. However, Sussex Police do not believe this goes far enough to evidence why their application would be an exception to policy or why the SoLP matrix should be departed from.

Paragraph 14.40 of the Secretary of State's Guidance to the Licensing Act 2003 (February 2025 provides:

'In publishing a CIA a licensing authority is setting down a strong statement of intent about its approach to considering applications for the grant or variation of premises licences or club premises certificates in the area described....Applications in areas covered by a CIA should therefore give consideration to potential cumulative impact issues when setting out the steps that will be taken to promote the licensing objectives.'

The applicant has offered some information under Section M of their application and in their cover letter but these are minimal workable conditions and Sussex Police do not believe these go far enough to help mitigate any potential risk in this area of the City. The conditions



offered fall far short of the current city-wide expected standard and while there is some mention of crime prevention measures such as CCTV and that the 'premises licence holder holds a valid SIA Door Supervisor licence', these have not been fully elaborated on. Additionally, no reduction in hours or restrictions around walk in/in person collections has been suggested e.g. closing to the public from 01:30. While what is offered can go some way to reduce incidents occurring and being managed within the premises itself, there are no conditions that can address the risks around take away and what happens once customers leave the premises. Sussex Police additionally contend that the carrying on of additional licensable activity and the hours applied for at these premises will add to the existing issues in this area.

Although there is no presumption of refusal in this area, it is still for the applicant to make positive proposals (including suitable conditions) to ensure they will not add to the existing issues in an area. We do not believe the applicant has done this and what is offered does not evidence that special attention has been paid when drawing up an operating schedule. Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application in light of the Police concerns, local issues and Local Authority special policy.

While we are unable to support this application and are seeking refusal, we have drawn up a list of potential conditions which go beyond what has been offered within the application. Should the panel be minded to grant this application in full or part, we ask you to consider imposing the conditions attached at Appendix 2. These can be added to or amended depending on what clarification the applicant provides.

Additionally, if the panel are minded granting, we ask for following to be considered:

- Eat in only from 01:30 (their current end time for licensable activity) or closing the premises to the public fully from 01:30 and offering a delivery only service.

By permitting consumption only within the venue they then take responsibility for the safeguarding of their customers and can have SIA security in place to help manage this. The applicant has not offered anything concrete in their application around how many SIA they plan to employ or what times.

Allowing people to walk in/takeaway means this safeguarding then falls to other agencies when customers leave the premises. This risk can be reduced if the premises is physically closed to the public with no collections from a certain time and only deliveries permitted.

- Deliveries can only be made to a private or workplace address.

This would stop consumption in public spaces in the early hours outside of safe controlled spaces.

- Reduction in hours for Late Night Refreshment

Recent Operation Marble crime data (February - April 2025) has shown that there is a peak risk of violent, sexual and drug offences on a Saturday and Sunday all the way up to 05:00,



evidencing the very real risk to the licensing objective of crime & disorder. Reducing the hours which the premises is open to the public or can provide take away may help manage this risk and prevent persons gathering in the locale when already intoxicated and interacting with one another negatively.

An additional condition of:

- The premises will not operate under this licence until all conditions set within it are evidenced to Sussex Police and the Local Authority Licensing Team as being adhered to.

The reason for this being that other recent applications that have been granted have been open and operating prior to adhering to all the conditions set at a hearing, putting the public and their staff at risk.

Yours sincerely,

REDACTED

Sgt Mark Redbourn o.b.o Insp Ben Morrison

Operations (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police

Attachments:

- Appendix 1 – email chain between Sussex Police Licensing & the applicant
- Appendix 2 – potential conditions

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

REP A - Appendix 1 Redacted

Request for Extension of Opening Hours – Flames Kebab and Pizza, Preston Road

Ebadullah Abid

Flames Kebab and Pizza

36 Preston Rd,

Brighton and Hove

BN1 4QF

[REDACTED]

Date: 27/05/2025

Dear Licensing Officer,

I am writing to you as the leaseholder of Flames Kebab and Pizza, located on 36 Preston Road Brighton, to formally request an extension of our business operating hours until 4:00 AM.

We have experienced a significant demand from our customers for late-night service, particularly through orders received after our current closing time. In response to this ongoing demand and in an effort to support the sustainability of our business during these economically challenging times, we believe that extending our hours will allow us to better serve the community and remain competitive.

We are fully committed to complying with all licensing conditions and will take the necessary steps to ensure that our operations do not cause disturbance to local residents or businesses during these extended hours.

I kindly ask you to consider this request and advise on any further steps we may need to take to proceed with this application.

Thank you for your time and consideration.

I look forward to your response.

Yours sincerely,

Ebadullah Abid

Leaseholder

Flames Kebab and Pizza

From: [REDACTED] on behalf of [Brighton Licensing](#)
Subject: RE: Request for extension of opening hours
Date: 28 May 2025 14:21:55
Attachments: [Statement of Licensing Policy 2021.pdf](#)
[image001.jpg](#)
[image002.jpg](#)

Dear Ebadullah Abid,

Thank you for your email and the attached letter with your request around potentially extending your licensing hours at Flames Kebab & Pizza, 36 Preston Road, Brighton. Can I ask whether you have read and considered the Brighton & Hove City Council (BHCC) Statement of Licensing Policy as part of this process please? I have attached a PDF of this for your reference.

Generally new premises licence applications and variations for Late Night Refreshment, even without alcohol, in the Special Stress Area (which Preston Road sits inside) until 04:00 would not be supported by Sussex Police. Premises open into the early hours of the morning attract their own unique issues and even if they are not themselves serving alcohol, may have to deal with intoxicated persons. Is the intention to remain open to walk ins/collections for the entire time you are licensed?

I note that your premises licence currently has no conditions attached to it under Annex 2 apart from one around public safety limiting the number of people allowed on the premises. Can I ask what other measures you have adopted already or would propose if you were to put forward an application to extend your hours? This may include but is not limited to: CCTV, use of SIA doorstaff, staff training etc.

As it stands, it is highly likely that Sussex Police would raise a representation to an application with the terms you are currently proposing. Preston Road is one of the main routes out the city centre and crime data shows that demand for police resources continues across the city until the early hours of the morning (05:00), particularly at the weekends. You have not offered or proposed anything to mitigate potential risk, nor have you provided any reasons why your application would be an exceptional circumstance under the BHCC Policy.

I appreciate this may not be the answer you were hoping for. You are of course still within your rights to make the application and have it heard by a panel of Councillors if Sussex Police do raise a representation. You will have a chance to present your case and the panel will make a decision based on hearing all parties points of view/evidence. The expectation would be on you as the applicant to take into account the BHCC Special Policy, offer exceptional circumstances and show how you would mitigate any increased potential risk that your premises could bring.

Kind regards,

Claire

Claire Abdelkader

Police Licensing Officer

Level 4 PALO Qualification

(she/her/hers)

Brighton & Hove Licensing Unit

Sussex Police | John Street | Brighton | BN2 0LA

From: Flames kebab & pizza ltd
Sent: 27 May 2025 19:45
To: Brighton Licensing
Subject: Request for extension of opening hours

Think before you click!

This email comes from an outside source. Do not click on links or open attachments unless you trust the sender. [Report any unexpected or unusual content.](#)

Dear Sir/Madam

I hope you are well.

Please find attached a formal letter requesting an extension of the opening hours for Flames Kebab and Pizza. The letter includes all necessary details regarding the proposed changes and the reasons for this request.

I would be grateful if you could review it at your earliest convenience. Should you need any further information, please don't hesitate to contact me.

Kind regards,
Ebadullah Abid

Flames Kebab & Pizza, 36 Preston Road, Brighton – Proposed Conditions

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.

Prevention of crime & disorder

2. 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 if CCTV footage is required to prevent and detect suspected or alleged crime; CCTV footage will be available to be viewed immediately and any CCTV footage that is required to be downloaded will be made available within 24 hours of an incident.
 - (e) 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, within 24hrs and without charge.
 - (f) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable - brighton.licensing@sussex.police.uk.
 - (g) 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.
3. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past 01:00. The door staff will be on duty from 01:00 until the premises is closed to the general public and ensure that all customers have left the vicinity of the premises.
4. 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. The written 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. At all times the premises is open to the public, the management will contract the back up services of an approved mobile support unit (MSU) that operates at all times the premises is open to the public, with a minimum of 2 SIA registered Door Supervisors operating from it. 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.
6. The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.
7. An incident log shall be kept at the premises and must be completed within 24 hours of the incident. It can be in paper or electronic form and will record the following:
 - a) all crimes reported to the venue
 - b) all ejections of patrons
 - c) any complaints received concerning crime and disorder
 - d) any incidents of disorder
 - e) all seizures of drugs or offensive weapons
 - f) any visit by a relevant authority or emergency service.
8. The incident log will:
 - a) be inspected and signed off by a manager at least once a month.
 - b) be kept on the premises 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 or as listed in condition 7 above.
 - c) be used to give feedback to staff to ensure that the log is used on each occasion that an ejection or incident occurs at the premises and to identify any patterns or trends.
 - d) be kept for a minimum of twenty four (24) months.

Public safety

-

Prevention of public nuisance

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

10. Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.

Protection of children from harm

11. No children under the age of eighteen (18) will be allowed to remain in the premises unaccompanied from 23:00.

12. All staff will be trained in:

- Identifying persons who are vulnerable for reasons which could include, but are not limited to: their age, intoxication and / or drugs, as well as identifying potential perpetrators.
- Conflict management.

The operator will have a policy in place assisting staff in how to deal with such situations.

All 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.

Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 12 weeks, with the date and time of the verbal reinforcement/refresher training documented.

REP B
EF CON ENDS 11.07.2025 VALID PCD & PPN

Emily Fountain
Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Date: 9th July 2025
Our Ref: 2025/01669/LICREP/EH
Phone: 01273 295801
e-mail: sarah.cornell@brighton-hove.gov.uk

Dear Emily Fountain,

Licensing Act 2003 - Representation regarding the application for a Variation of the Premises Licence for Flames Kebab and Pizza, 36 Preston Road, Brighton, BN1 4QF Premises Licence Application Reference - 2025/04771/LAPREV

I refer to the application made by Ebadullah Abid, for a variation of the Premises Licence at Flames Kebab and Pizza, 36 Preston Road, Brighton. The proposal is to extend the current late night refreshment hours and opening hours from 01:30am to 4am every day.

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 and Disorder and the Prevention of Public Nuisance. This premises is also situated on Preston Road, which sits within the Licensing Authority's Special Stress Area (SSA).

As stated in the Council's Statement of Licensing Policy (SoLP), the SSA is deemed an area of special concern in terms of the levels of crime and disorder and nuisance experienced within it. Our SoLP states that new and variation applications for premises 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.

Guidance issued under S182 of the Licensing Act 2003 states that in completing an operating schedule, applicants are expected to have regard to the statement of licensing policy for their area. The guidance goes on to say that applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, SSA and matrix approach to decision making policies), applicants are also expected to demonstrate an understanding of how the policy impacts on their application, any measures they will take to mitigate the impact, and why they consider the application should be an exception to the policy.

On looking at the application form and covering letter, the applicant has proposed some additional measures to promote the licensing objectives, it is up to the panel to decide if they feel that these measures constitute exceptional circumstances to depart from our policy.

Telephone: 01273 290000
www.brighton-hove.gov.uk

The Council's SoLP includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix Model recognises the diverse operation and different risks presented by different classes of licensed premises. The SoLP 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. Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances.

The decision-making Matrix on page 18 of the Council's SoLP clearly shows that late night takeaways in the Special Stress area should have a maximum terminal hour of midnight. This application is asking for 4am every day and it is unclear if the extension will cover walk-ins and deliveries, or just deliveries after a certain time.

It is my opinion, granting this application is likely to add to the additional burdens and problems in the Special Stress area. The Licensing Team act as guardians of the Council's SoLP and I make this representation on behalf the Licensing Authority as I believe the application made is contrary to our policy and therefore invite the panel to carefully scrutinise the application and decide if it constitutes exceptional circumstances to depart from our policy.

Yours sincerely

REDACTED

Sarah Cornell
Senior Licensing Officer
Licensing Team
Environmental Health and Licensing
Regulatory Services

Agreed Conditions between Applicant and Environmental Protection 18/06/25

From: Emma Grant <REDACTED>

Sent: 18 June 2025 08:08

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Subject: FW: Application for Late Night Refreshment until 04:00 Flames Kebab and Pizza, Preston Rd

Hello

Please see agreed conditions under the Licensing objective of prevention of public nuisance. Subject to these EP will not be making a representation.

1. Ensuring that all delivery vehicles waiting or arriving to collect orders will be parked legally and will not cause any obstruction or nuisance on the highway or footpaths.
2. Conducting litter patrols every half hour during operating hours in the vicinity of the premises to maintain cleanliness.
3. Displaying prominent notices at all exits, requesting patrons to respect local residents and businesses by leaving quietly.
4. Taking all necessary measures to ensure that no fumes, steam, or odors are emitted from the premises that could cause a public nuisance.
5. Controlling noise levels so that no noise or vibrations emanate from the premises that could disturb nearby residents or businesses.
6. Restricting deliveries to the premises between 9:00 pm and 6:00 am daily.
7. Ensuring that recycling and rubbish are not placed outside or collected between 9:00 pm and 6:00 am daily.

Regards, Emma

Emma Grant

Environmental Protection Officer

Licensing Officer. Brighton & Hove City Council,
2nd Floor, Barts House, Barts Square, BN1 1JP
REDACTED

From: Flames kebab & pizza ltd

Sent: 17 June 2025 20:17

To: Emma Grant

Subject: Re: Application for Late Night Refreshment until 04:00

Hi Emma,

Thank you very much for your detailed email and for outlining the conditions under the licensing objective of preventing public nuisance.

We have carefully reviewed all the conditions and would like to confirm that we are happy to accept and fully comply with each of them, including:

1. Ensuring that all delivery vehicles waiting or arriving to collect orders will be parked legally and will not cause any obstruction or nuisance on the highway or footpaths.
2. Conducting litter patrols every half hour during operating hours in the vicinity of the premises to maintain cleanliness.
3. Displaying prominent notices at all exits, requesting patrons to respect local residents and businesses by leaving quietly.
4. Taking all necessary measures to ensure that no fumes, steam, or odors are emitted from the premises that could cause a public nuisance.
5. Controlling noise levels so that no noise or vibrations emanate from the premises that could disturb nearby residents or businesses.
6. Restricting deliveries to the premises between 9:00 pm and 6:00 am daily.
7. Ensuring that recycling and rubbish are not placed outside or collected between 9:00 pm and 6:00 am daily.

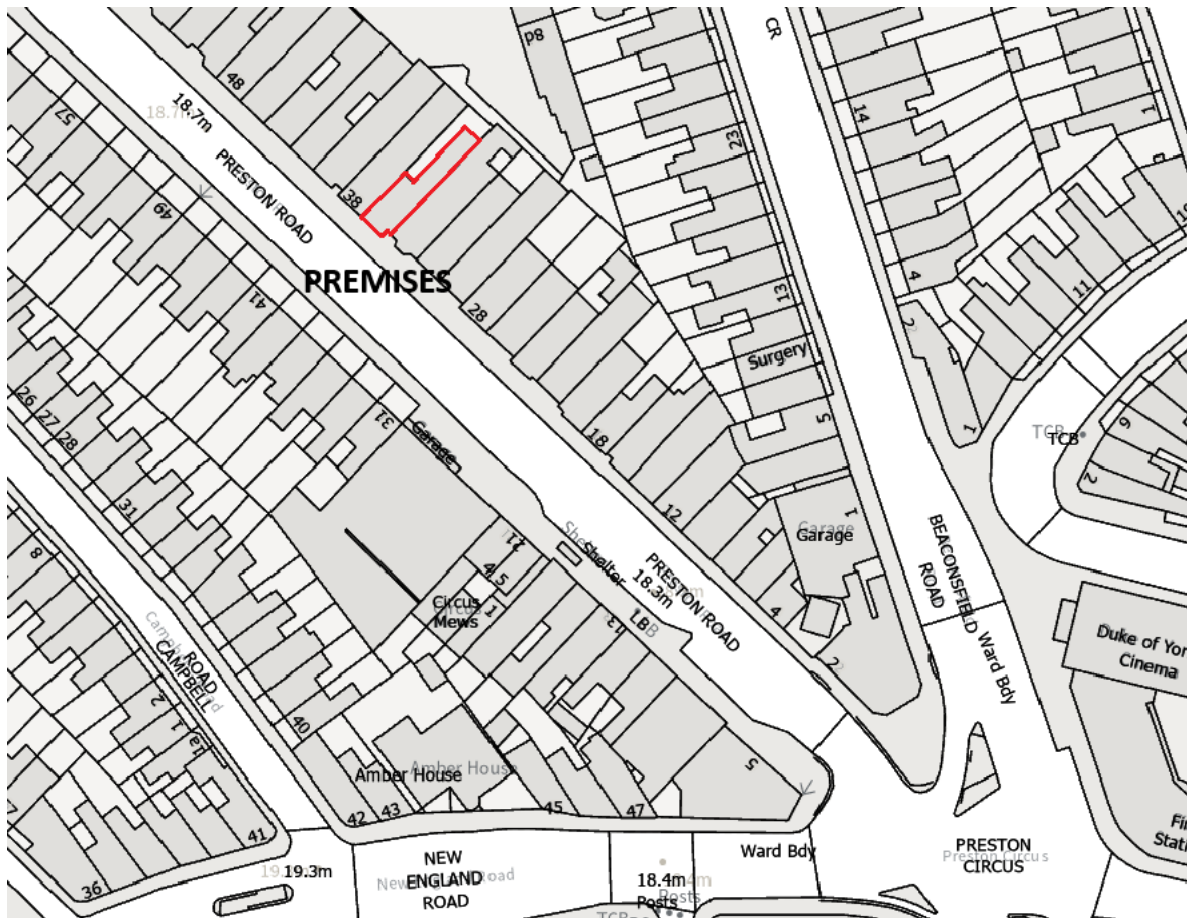
We appreciate the Environmental Protection Team's consideration and support, and we look forward to operating responsibly in accordance with these conditions.

Please let us know if there is any further information or documentation you require.

Thank you again for your assistance.

Kind Regards
Ebadullah

Appendix D



Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:		Application for a New Premises Licence under the Licensing Act 2003	
Premises:		Hove Pizza Plaice, 162 Portland Road, Hove BN3 5QL	
Applicant:		Perfect Pizza Place Ltd	
Date of Meeting:		01.08.2025	
Report of:		Corporate Director for City Operations	
Contact Officer:	Name:	Sarah Cornell	Tel: 07825387364
	Email:	sarah.cornell@brighton-hove.gov.uk	
Ward(s) affected:		Westbourne & Poets' Corner	

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a **New** Premises Licence under the Licensing Act 2003 for **Hove Pizza Plaice**.

2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a **New** Premises Licence under the Licensing Act 2003 for **Hove Pizza Plaice**.

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a **New** Premises Licence under the Licensing Act 2003. The application proposes

To request a late night refreshment licence for my pizza takeaway business, Hove Pizza Place, located at 162 Portland Road, Hove, BN3 5QL. We would like to extend our opening hours to operate between 11:00PM and 4AM, seven days a week, to meet customer demand. We're committed to complying with all licensing conditions including managing & maintaining a safe environment.

- 3.2 Part M (Operating Schedule) of the application is detailed at Appendix A and the plan of the premises is attached at Appendix B

3.3 Summary table of proposed activities

	Proposed
Late Night Refreshment	Every Day: 23:00 – 04:00
Hours premises are open to public	Every Day: 11:00 – 04:00 Indoors

3.4 The premises does not fall in the Cumulative Impact Area or the Special Stress Area.

Representations received

3.5 Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:

3.6 3 representations were received. They were received from Sussex Police, the Environmental Protection Team and the Licensing Authority

3.7 Representations received had concerns relating to Prevention of Crime and Disorder and Prevention of Public Nuisance.

3.8 Full details of the representations and agreement(s) 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.

3.3 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)

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

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.

4.1.3 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.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.

4.2.5 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

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 David Wilder

Date: 23/07/2025

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: 23/07/25

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 – Part M Operating Schedule
2. Appendix B – Plan of Premises
3. Appendix C – Representations
4. Appendix D – Map of the 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

M

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

WE OPERATE A LATE-NIGHT RESPONSIBLY WITH TRAINED STAFF, CCTV, REGULAR CLEANING, AND CLEAR SIGNAGE TO ENSURE SAFETY, PREVENT DISTABENCE, AND PROMOTE A SAFE ENVIRONMENT FOR ALL

b) The prevention of crime and disorder

CCTV WILL COVER KEY AREAS, STAFF WILL BE TRAINED TO MANAGE ANTI-SOCIAL BEHAVIOR, AND WE WILL WORK WITH AUTHORITIES IF NEEDED. NO ALCOHOL IS SERVED ON THE PREMISES.

c) Public safety

WE MAINTAIN A CLEAN, WELL-LIT SHOP WITH WORKING FIRE SAFETY EQUIPMENT AND CLEAR EXITS. STAFF ARE TRAINED IN BASIC SAFETY PROCEDURES.

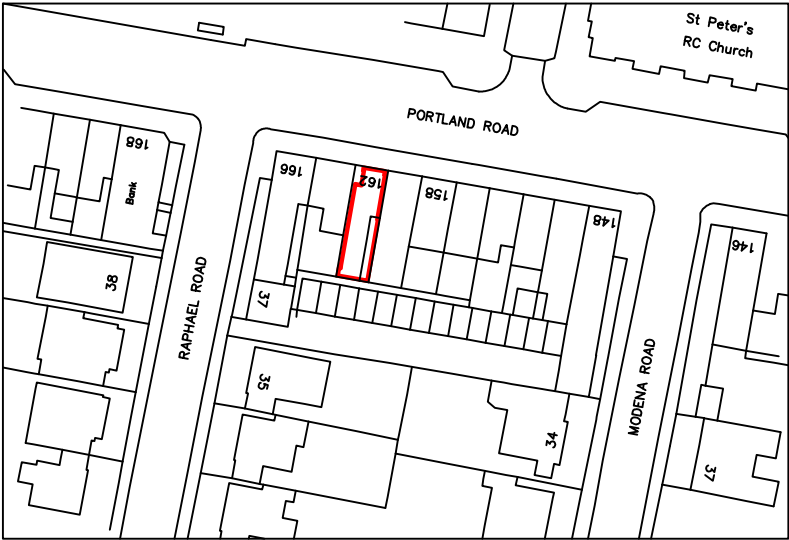
d) The prevention of public nuisance

CUSTOMERS WILL BE ASKED TO LEAVE QUIETLY, AND NO LOUD MUSIC WILL BE PLAYED. WASTE WILL BE MANAGED PROPERLY, AND THE SHOPFRONT KEPT CLEAN

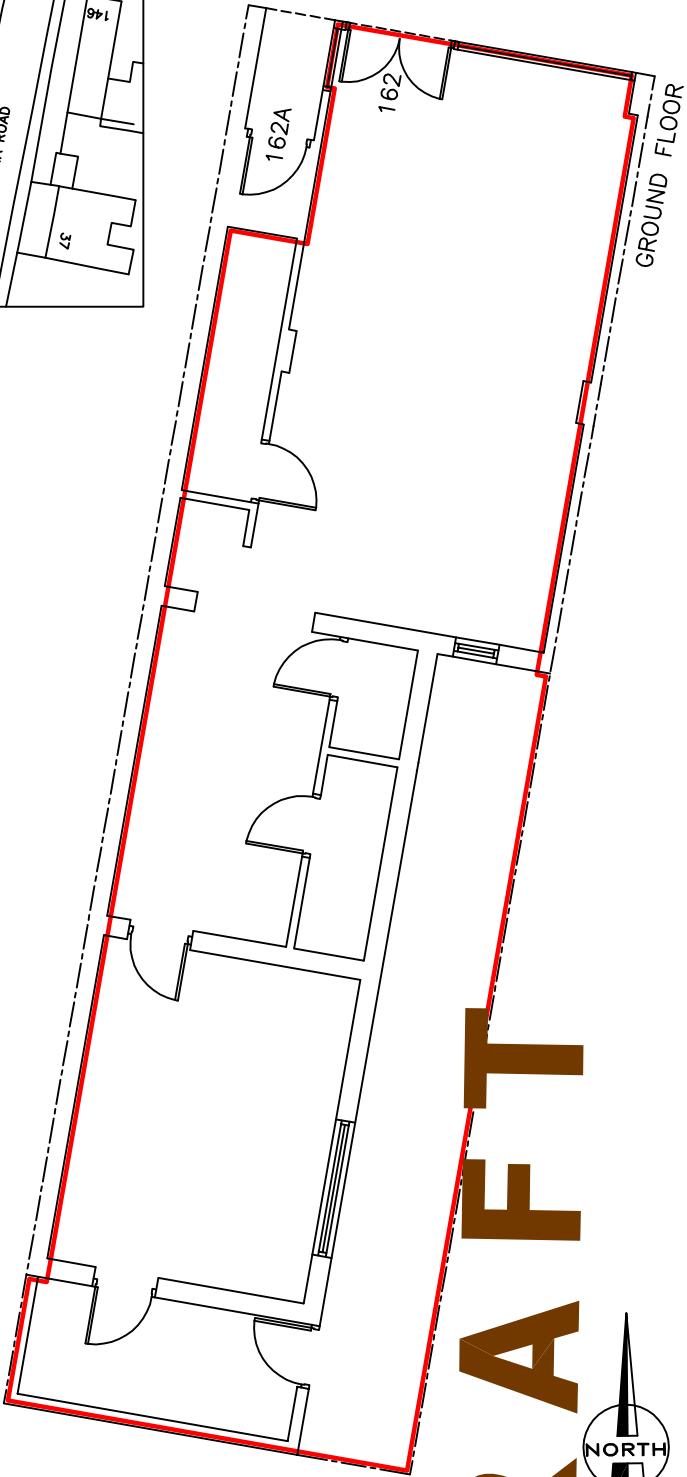
e) The protection of children from harm

WE DO NOT SERVE ALCOHOL. STAFF WILL MONITOR FOR ANY ISSUES INVOLVING CHILDREN AND TAKE APPROPRIATE ACTION IF NEEDED

Checklist:



LOCATION PLAN
SCALE 1:1250



NATIONAL LEASE PLANS
Suite D2 Northside House, Mount Pleasant
Cockfosters, EN4 9EB
T: 0845 124 9552
www.nationalleaseplans.co.uk

ADDRESS:
162 PORTLAND ROAD
HOVE
BN3 5QL

DETAILS:
LEASE PLAN

SCALE: DATE:
DEC 2024

DRAWING NO:
162/01



Appendix C

REP A

Sarah Cornell
Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN11JP

Date: 25 June 2025
Our Ref: 2025/01549/LICREP/EH
Phone: 01273 294429
e-mail: [REDACTED](#)

SC CON ENDS 09.07.2025 VALID PCD & PPN (A)

Dear Sarah Cornell

**Licensing Act 2003 - Representation regarding the application for a New Premises
Licence for Hove Pizza Plaice, 162 Portland Road, Hove BN3 5QL
Premises Licence Application Reference - 2025/04696/LAPREN**

I refer to the application made by Perfect Pizza Place Ltd for a new Premises Licence for the provision of Late-Night Refreshment at Hove Pizza Plaice, 162 Portland Road, Hove BN3 5QL.

The Licensing Team, in its role as a Responsible Authority, has concerns about this application and I am submitting this representation on the grounds of the Prevention of Crime and Disorder, the Prevention of Public Nuisance and to uphold our Statement of Licensing Policy (SoLP).

The applicant has applied for a Premises Licence for late night refreshment every day 23:00hrs – 04:00hrs.

It is recognised that this premises is not in either the Cumulative Impact Zone (CIZ) or Special Stress Area (SSA). However, this representation is submitted as there are concerns that the application does not meet the requirements of the Council's SoLP, with regards to applications made for late night takeaways.

The Council's SoLP includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix Model recognises the diverse operation and different risks presented by different classes of licensed premises. The SoLP 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 all other areas outside of CIZ and SSA, new applications for late night takeaways shall be granted up to 12:00midnight. 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.

The applicant has offered a few conditions within the operating schedule. However, I do not believe they have demonstrated exceptional circumstances to depart from our policy or how the grant of a late-night refreshment licence until 04:00am would not impact on the area.

The Licensing Team makes this representation to uphold the Council's SoLP, which we believe this application contradicts, as The Matrix states that no late-night takeaways beyond 12:00midnight should be granted in "Other Areas" and request the Panel determine the outcome of this application.

Yours sincerely

REDACTED

Corinne Hardcastle
Licensing Officer
Regulatory Services - Licensing Team

REP B

Sarah Cornell
Senior Licensing Officer
Brighton and Hove City Council

Date: 4th July 2025
Our Ref: 2025/01505/EPLIC/EH
Phone: 01273 292167
E-mail: [REDACTED](#)

SC CON ENDS 09.07.2025 VALID PPN (B)

Dear Sarah Cornell

Formal Representation for an Application for a New Premises Licence to Provide Late Night Refreshment

Re: Hove Pizza Plaice 162 Portland Road Hove BN3 5QL

I refer to an application made by the Hove Pizza Plaice 162 Portland Road Hove BN3 5QL for a late-night refreshment licence to operate between 2300 hours and 0400 hours, seven days a week.

I write as a consultee on behalf of the Environmental Protection Team to formally make a representation on the grounds of the Prevention of Public Nuisance; one of the four objectives as specified by the Licensing Act 2003.

On the 17th of February 2025, the Environmental Protection Team received a complaint from a resident **REDACTED** Hove Pizza Plaice about noise and smell from the industrial pizza oven and extraction system of the business.

It was alleged that the smell was from gas coming from the business when they used their stove/pizza oven, and the noise was from the extractor unit and the large industrial oven they use for pizzas.

On the 10th of April 2025, I visited to assess the problems and noticed that the business's large extraction flue is located **REDACTED** (please see below).

REDACTED Photo

After a warning letter to the pizza place, we were told that a part in the flue ducting was changed, which reduced the noise from the flue. However, I could hear a

humming sound from the oven beneath **REDACTED** that could be a problem if they must deal with this noise until 2300 hours when the business closes presently.

I believe that sound is easily transmitted between the commercial and residential premises due to the structural nature of the building, which might not be suitable to house such industrial appliances.

Unfortunately, case law restricts what action the Team can take in cases where noise stems from building structures that met building regulations at the time they were built. The business can also claim that they have used the best practicable means as a defence even if these measures do not resolve the noise problem for the complainant.

We managed to get the business owners to explore methods to mitigate the noise; vibration mounts were placed underneath the oven to reduce the vibration, which was thought to be responsible for the noise **REDACTED** were experiencing.

Although, the complaints from **REDACTED** have subsided for now, based on experience, the sensitive hours proposed, the size of the pizza oven and flue, the structural nature of the building, the proximity of the flue **REDACTED** and the fact that the pizza place intends to operate 7 days a week, it is my opinion that a Nuisance is waiting to happen if this application is granted.

In the event that a noise problem occurs, we might have limited powers with which to protect the **REDACTED** as our ability to act will depend on the sort of noise being complained about.

Please do not hesitate to contact me if you wish to discuss the matter further.

Yours sincerely

Chinwe Ihemefor
Environmental Health Officer

If requested by a third party under the provisions of the **Freedom of Information Act 2000** the contents of this letter may be disclosed by Brighton & Hove City Council. For further advice please contact 01273 291207 or search our website on www.brighton-hove.gov.uk/foi

REP C

Police Station
John Street
Brighton
BN2 0LA

Email: brighton.licensing@sussex.police.uk

SC CON ENDS 09.07.2025 VALID PCD & PPN (C)

04th July 2025

The Licensing Technical Support Officers
Environmental Health, Brighton & Hove City Council
Bartholomew House, Bartholomew Square
Brighton, East Sussex
BN1 1JP

Dear Sarah Cornell,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR HOVE PIZZA PLACE, 162 PORTLAND ROAD, HOVE, BN3 5QL UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing

Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed new licence application in an area of the City which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Other Areas (as defined in the BHCC Statement of Licensing Policy) and seeks the following hours and licensable activities:

Late Night Refreshment (Both)

Every Day 23:00 – 04:00

Opening hours

Every Day: 23:00 – 04:00

In accordance with the Statement of licensing policy this application would be a “NO” as Late Night Refreshment is recommended until Midnight as a terminal hour.

Recent incident & crime statistics indicate that during the period of 04th July 2024 and 04th July 2025 there were 180 crimes linked to Portland Road and surrounding side roads. 80 out of the 180 incidents were recorded as violent crime in a public place and thefts.

With the area already experiencing high number of incidents which occur mostly throughout the day, permitting a premises to be open into the nighttime economy is likely to increase incidents in the locality, and overall increase crime into the early hours of the day. There are already a number of premises which trade along Portland Road, varying between pubs, off licences and food led premises Sussex Police believe the latest terminal hour is until 2am.

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering food and drink into the early hours encourages persons who may be under the influence of alcohol or drugs to remain in the area, which has a number of residential flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance.

The applicant has not pre consulted with Sussex Police, but they have offered some proposals under Subsection M on the application form, however there is limited detail for their operation.

Sussex Police would expect to see further details regarding CCTV, especially offering how many days the CCTV will record for and the cooperation with Police if there was an incident at the premise.

With regards to training, Sussex Police would expect to see this recorded and documented. Further to this the applicant has not offered any protective measures such as SIA or membership to BCRP should an incident occur in the premises between the hours of 23:00 – 04:00 which could result in either not reporting incidents or there being an increase in calls to Police.

Lastly, there has been no mention of deliveries and if the applicant plans to operate deliveries from their premises between the hours of 23:00 – 04:00 and no conditions have been offered to safeguard any deliveries which may take place.

Sussex Police are unable to support this application and are seeking refusal. However, if the Licensing Panel are minded to grant this application at the hearing, Sussex Police have attached conditions and ask that these conditions are added to the Premises Licence, taking into account the request that the premises trades only for deliveries from 23:00 – 01:00. The conditions being offered unfortunately do not mitigate fully the risks should this premises trade until 04:00am. They go some way to reduce incidents occurring within the premises itself but there are no conditions that can address the risks once customers have departed. The risks of them becoming a victim of crime or them partaking in criminal activity is one that will need to be dealt with by the emergency services. Or if public nuisance issues occur, then this will be for the environmental officers to pick up.

Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application.

- Attached proposed conditions.

Yours sincerely,

REDACTED

Insp Ben Morrison
Ops Planning and Events (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

Proposed conditions for Hove Pizza Place.

Terminal hour 01:00 – delivery only between 23:00 – 01:00

General:

1. Authorised staff employed by Sussex Police shall have free access to all parts of the licensed premises at all times licensable activity is taking place, for the purpose of inspection to ensure compliance with the terms and conditions of the premises licence and to ensure the promotion of the licensing objectives.
2. No alcohol will be offered for sale under this licence.
3. The premises will not be open or accessible to the general public at any time and will operate as a delivery only kitchen. There will be no collection of goods by the public from the premises.

For the Prevention of Crime and Disorder:

4. 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.
 - h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Sussex 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.
5. An incident log shall be kept at the premises and made available on request to an authorised officer of the Council or the Police. It must be completed within 24 hours of the incident and will record the following:
- a) all crimes reported to the venue
 - b) any complaints received concerning crime and disorder
 - c) any incidents of disorder
 - d) any faults in the CCTV system, searching equipment or scanning equipment
 - e) any visit by a relevant authority or emergency service.

Feedback shall be given to staff to ensure these are used on each occasion that an incident occurs at the premises. The log will be kept for a minimum of twenty-four (24) months.

For Public Safety:

- 6. The business will arrange for the telephone number for the premises and/or a member of the management team to be provided to residents upon request in order that any complaints can be made direct.

For the Prevention of Public Nuisance:

- 7. All delivery orders shall be to a registered residential or business address. There shall be no deliveries to public/communal areas or open spaces.
- 8. All deliveries will leave the premises by 01:00 hours and the premises will be closed by that time.
- 9. Delivery drivers will not congregate outside after 23:00 and only enter/leave the site to make deliveries and when the delivery item is ready

10. Members of the public are not permitted on the premises at any time. Other than staff preparing the food, only delivery drivers will enter the premises to collect the food to be delivered. If the food is not ready, they will wait inside the premises or in their vehicles. Delivery drivers will not gather outside the premises while waiting to pick up orders.
11. Engines will not be left running when the vehicles are parked.
12. Deliveries to the premises and refuse and recycling collections from the premises must only take place between 08:00 and 20:00.

For the Protection of Children from Harm:

13. The business will arrange for the telephone number for the premises and/or a member of the management team to be provided to residents upon request in order that any complaints can be made direct.

14. a) All staff will be trained in:

- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management.

The operator will have a policy in place assisting staff in how to deal with such situations.

b) All 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.

c) 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.

If the panel are minded to allow the premises to trade with persons being able to purchase food to eat in/ take away – please consider the additional conditions below

- 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. The written 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.

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

- The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to

local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.

Appendix D

