

Licensing Panel (Licensing Act 2003 Functions)

Date: **16 June 2026**

Time: **10.00am**

Venue **Virtual**

Members: **Councillors:** Czolak, Lyons and Sykes

Contact: **Marie Button**
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AGENDA

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.

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(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.

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

3 BILLIES LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

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Contact Officer: Corinne Hardcastle

Tel: 0127329

Ward Affected: Regency

Date of Publication - Monday, 8 June 2026

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FURTHER INFORMATION

For further details and general enquiries about this meeting contact Marie Button, (01273 291214, email Marie.Button@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 New Premises Licence under the Licensing Act 2003

Premises: Billies, 34 Hampton Place, Brighton, BN1 3DD

Applicant: Billies Cafe Limited

Date of Meeting: 16 June 2026

Report of: Corporate Director for City Operations

Contact Officer: Name: Donna Lynsdale

Email: donna.lynsdale@brighton-hove.gov.uk

Ward(s) affected: Regency

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a New Premises Licence under the Licensing Act 2003 for Billies.

2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a New Premises Licence under the Licensing Act 2003 for Billies.

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a New Premises Licence under the Licensing Act 2003. The application proposes: ***“We are currently a café however applying for a premises licence in order to operate as a Restaurant.”***
- 3.2 Part M of the application is detailed at Appendix A proposed plan of the premises is attached at Appendix B.
- 3.3 Summary table of proposed activities

	Proposed
Supply of Alcohol	Every Day: 11:00-23:00 On the Premises
Hours premises are open to public	Every Day: 08:00-23:00 On the Premises

- 3.4 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 it. (See paragraphs 3.3 – 3.3.5)

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 7 representations were received. They were received from local residents, and a local Councillor.
- 3.7 Representations received had concerns relating to Prevention of Crime and Disorder, Prevention of Public Nuisance, Protection of Children from Harm.
- 3.8 Full details of the representations are attached at Appendix C. A map detailing the location of the premises is attached at Appendix D.
- 3.9 Appendix E details the Applicants responses to Representations.

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 5 January 2026. 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.

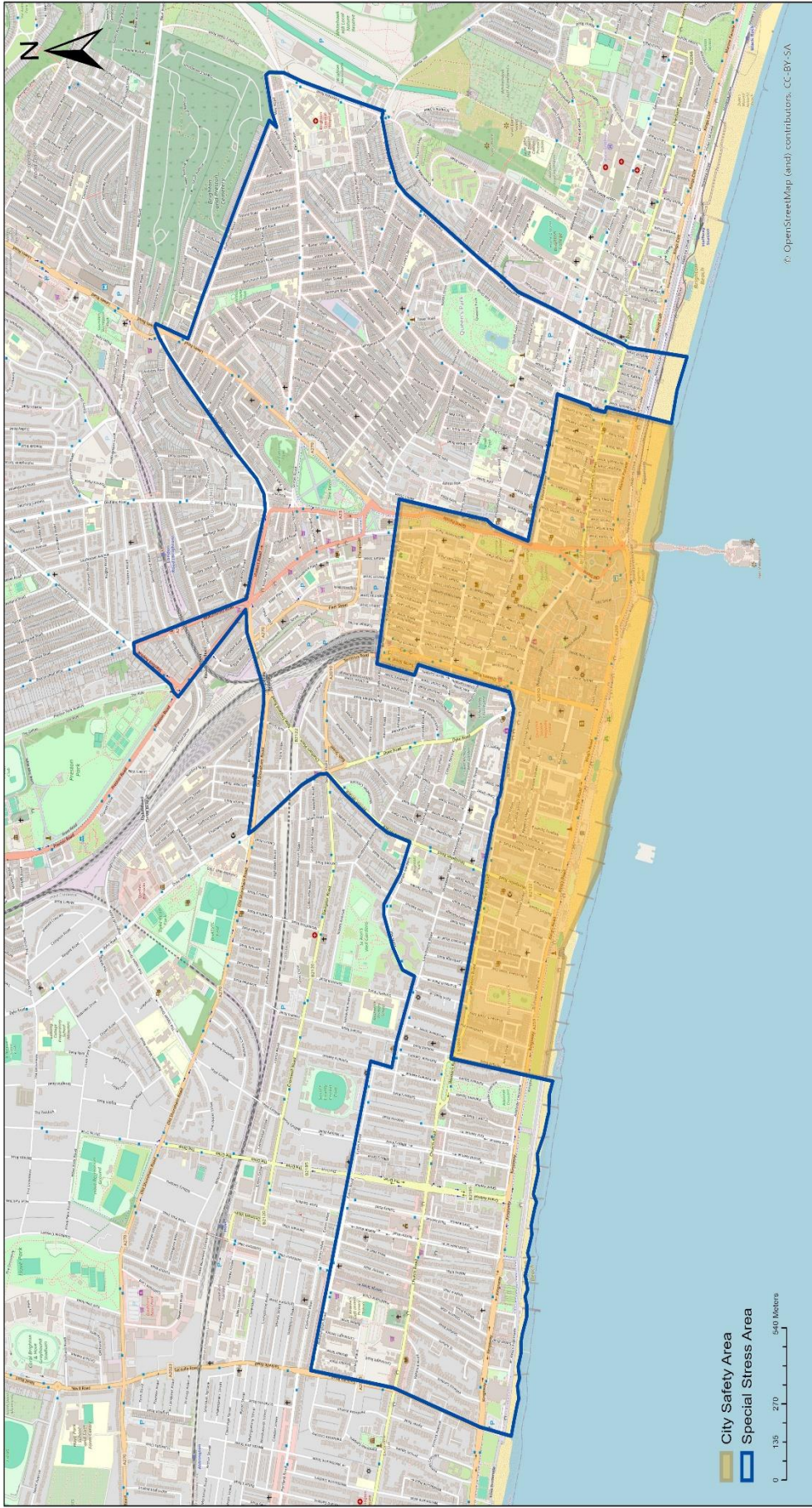
3. Special Policies and Initiatives

3.3 Special Stress Area

Since March 2008, the licensing authority has kept the Special Stress Area (SSA) under review which included in Nov 2018, expanding the SSA into Central Hove and in Nov 2020 it was expanded further into Preston Road and Beaconsfield Road.

3.3.1 The map below details the area of the city centre which borders the City Safety Area 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 blue.

City Safety Area and Special Stress Area, July 2025



Brighton and Hove City Council, Public Health Intelligence Team
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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.

- 3.3.2 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.
- 3.3.3 For all new and varied applications for premises and club premises certificates within the SSA 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.
- 3.3.4 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.

- 3.3.5 The Licensing Authority will keep the City Safety Area 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.

3.4 The Matrix Approach

The Licensing Authority will support:

3.4.1 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 and Crime Reduction Strategy [Community safety and crime reduction strategy 2023 to 2026](#) 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.

3.4.2 A ‘Matrix’ approach to licensing decisions has been adopted and is set out below. It provides a firm 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 investors and businesses making applications. It underpins the City Safety Policy (see above at 3.1).

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

	City Safety Area	Special Stress Area	Other Areas
Food & dining venues	1 am	1 am	1 am
Fast food premises	No	Midnight Deliveries until 2am	Midnight Deliveries until 2am
Cafe	10pm	10pm	10pm
Performance venues	Midnight	Midnight	Midnight
Grassroots Music venues	Midnight	1am	1am
Nightclubs	No	No	No
Public houses and bars	No	Midnight	Midnight
Non-alcohol led venues	Midnight	Midnight	Midnight
Off licences	No	No	Yes (Up to 11pm – (see note f below)
Shared workplaces, co-working offices	Midnight	Midnight	Midnight
Members’ clubs	11pm	Midnight	Midnight

3.4.3 Explanatory notes on matrix

Definitions: each venue will be considered individually, and the below definitions may need to be applied flexibly depending on the business model of the specific venue

Food and dining venues	<ul style="list-style-type: none"> • Provide substantial table meals to customers dining at the premises • Food is prepared on site • Alcohol is sold to customers ancillary to a substantial table meal for consumption at the premises (or in an associated outdoor dining area) only • If takeaway service is provided, must be ancillary to provision of substantial table meals
Fast food premises	<ul style="list-style-type: none"> • Provide late night refreshment of fast food intended for immediate consumption on the premises or takeaway • Food is served in disposable packaging
Cafes	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises in addition to other food and drink products • Food and drink is served to customers seated at a table including to any outdoor designated area • Food is prepared on site and the premises will have a fully operational kitchen • A full menu of the hot and cold food items available will be clearly on display within the premises. • Generally operate in the daytime and early evening only.
Performance venues	<ul style="list-style-type: none"> • Provide performances of live music, theatre, dance and other creative arts to entertain an audience • Includes live music venues, concert venues, cabarets and theatres • Does not include karaoke or Grassroots Music Venues
Grassroots Music Venues	<ul style="list-style-type: none"> • Grassroots Music Venues are small, typically local venues that provide a platform for emerging and independent musicians to perform. They are often pubs, clubs, or other small spaces where artists can hone their craft, gain experience, and connect with a local audience. These venues play a crucial role in nurturing talent and supporting the development of the music scene. • A member of Music Venues Alliance Brighton or Music Venues Trust or similar
Nightclubs	<ul style="list-style-type: none"> • Provide regulated entertainment and the sale of alcohol • Main licensable activity is recorded and live music with provision of dance floors, sound systems and light displays • Generally, operate at night and into early hours of the morning
Public houses and bars	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises

	<ul style="list-style-type: none"> • Sale of alcohol takes place at the bar • Includes tap rooms and craft beer pubs • May also carry out other licensable activities • Does not include cafes
Non-alcohol led venues	<ul style="list-style-type: none"> • Cultural venues such as art galleries, museums, theatres • Experiential entertainment venues such as escape rooms and social gaming venues • Alcohol is sold to customers for consumption on the premises • Supply of alcohol is ancillary to entertainment offering • Does not include shared workplaces and co-working offices
Off licences	<ul style="list-style-type: none"> • Supermarkets and convenience stores which supply alcohol for consumption off the premises in addition to other retail products • Includes alcohol delivery services fulfilling remote orders for sale of alcohol • Restrictions on ABV% e.g. the Sensible on Strength 6% condition
Shared workplaces, co-working offices	<ul style="list-style-type: none"> • Office premises in which individual workstations and meeting rooms are rented to solo workers and small businesses
Members' clubs	<ul style="list-style-type: none"> • Premises authorised to carry out licensable activities under a club premises certificate

3.4.4 **Each application will be considered on its own merits.** However, the Licensing Authority will apply the Matrix Approach in all cases unless there are exceptional circumstances which justify a different approach.

- a). **Applications within the CSA** will be subject to a special policy requiring robust measures to be included in the operating schedule to promote safety. Applications within the SSA will be subject to the special stress policy set out in 3.3.
- b). **Exceptional circumstances.** The Licensing Authority will determine exceptional circumstances on a case-by-case basis. An example of exceptional circumstances could be where the applicant has provided sufficient assurances to the responsible authorities that they do not make relevant representations against the application. Another example is where the application is for a variation to an existing premises licence and the applicant satisfies the criteria for a “good operator”.
- c). **Activities which the Licensing Authority values and wishes to encourage:** LGBTQ+ and TNBI venues; outdoor regulated entertainment; cafes; members’ clubs; traditional pubs (outside the CSA); non-alcohol led licensable activities, especially within the city centre. The Licensing Authority will aim to permit these types of venues in appropriate locations, but will consider each case – including any relevant representations – on its own merits.
- d). **Location.** Consideration will be given to the character of the area of the venue in every case. In residential areas, the Licensing Authority will pay particular

attention to the potential of a venue to cause public nuisance, especially noise disturbance, littering and anti-social behaviour. In these areas, an early closing time may be appropriate.

- e). **Food and dining venues.** The Licensing Authority will require conditions to ensure that these venues are food-led, such as: alcohol to be sold only to customers taking a substantial table meal; no takeaway service of food for immediate consumption (an ancillary meal delivery service is acceptable). Where the venue has an agreement to use an adjacent outdoor area, the Licensing Authority will require evidence that a pavement licence has been granted for use of the highway (for highway land) or landowner's consent (for land other than a highway).
- f). **Off licences.** Particular consideration will be given to applications for off-licences in areas which already have one or more off-licences in close proximity, due to concerns about street drinking, underage sales and anti-social behaviour. Where relevant representations are made raising these issues, the application is likely to be refused or – if it is appropriate to grant the application – granted subject to a terminal hour in line with neighbouring off licences.
- g). **Outdoor events.** Outdoor events will generally be supported where they have been arranged through the Council's event planning process.

3.4.6 **Food & Dining Venues** - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following conditions.

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

3.5 **Good Operator Policy**

3.5.1 Good operators of licensed premises are valuable partners in assisting the Licensing Authority to promote the licensing objectives in Brighton and Hove and contributing to our city's unique and vibrant culture. The Licensing Authority has therefore decided to introduce a new policy measure – the Good Operator Policy – to reward and incentivise the responsible management of licensed premises. Under the Good Operator Policy, there will be a presumption in favour

of granting applications to vary premises licences which are submitted by good operators as defined by this policy. This includes variations to trading hours beyond the hours indicated by the Matrix Approach. In general, the Licensing Authority will consider granting such applications to be appropriate for promoting the licensing objectives – unless there is clear and compelling evidence they would be undermined by granting the application.

3.5.2 A "good operator" is an applicant for an application to vary a premises licence who satisfies all of the following criteria:

- at the time of making the variation application, and at the time the application is determined, they are the holder of the premises licence subject to the application
- in the 3 to 5 year period prior to submitting the application, the applicant has not been subject to any formal intervention by the responsible authorities in connection with that [or any other] premises in Brighton and Hove.
- Formal intervention includes the following; a formal written warning; an application for review or summary review; a closure notice or closure order; a prosecution for an offence under the Licensing Act 2003; a penalty for employing illegal workers; or an abatement notice.

6. 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.

6.1.1 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 programs which will raise their awareness of the issues relating to spiking, 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 programs to help identify children at risk and issues of basic child protection and vulnerable individuals. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence and their responsibility to uphold all four licensing objectives.

6.1.2 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

- 6.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.
- 6.1.4 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.

8. 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:

- 8.1.1 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 (e.g. in order to smoke).
- 8.1.2 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.
- 8.1.3 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.
- 8.1.4 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.
- 8.1.5 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.
- 8.1.6 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 8.2 below).

8.2 Smoking Advice

8.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on their 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 Health 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 it may be 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.

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

9. Protection of Children from Harm

The following details and measures are intended to address the need for the protection of children from harm; this includes emotional and physical harm which may be associated with licensed premises and certificated club premises (for example the exposure too early to strong language and sexual expletives, e.g. in the context of film exhibitions or where adult entertainment is provided). It is intended that the admission of children to premises holding a premises licence or club premises certificate should normally be freely allowed without restricting conditions (unless the 2003 Act itself imposes such conditions or there are good reasons to restrict entry or to exclude children completely).

- 9.1.1 Licensees should note the concern of the authority that drink related disorder frequently involves under 18's. To prevent illegal purchases of alcohol by such persons, all licensees should work with a suitable 'proof of age' scheme and ensure that appropriate identification is requested prior to entry and when requesting alcohol, where appropriate. Appropriate forms of identification are currently considered to be those recommended by the Home Office, police, trading standards officers and their partners (eg passport, photo driving licence or pass card). The advent of digital identification will bring new technologies and challenges which responsible authorities and licensees will need to be mindful of and have a personal responsibility to remain informed and trained on.
- 9.1.2 It is the licensing authority's expectation that all staff responsible for the sale of intoxicating liquor receive information and advice on the licensing laws relating to children and young persons in licensed premises. Licensed premises staff are required to take reasonable steps to prevent under age sales. The licensing authority will not seek to limit the access of children to any premises unless it is necessary for the prevention of emotional or psychological harm to them. Each application will be considered on its own merit but particular areas that will give rise to concern in respect of children are to be found in section 9.1.4 below.
- 9.1.3 To reduce alcohol-induced problematic behaviour by under 18 year olds, to enforce underage purchase and drinking laws and to assist in the protection of children from harm, the licensing authority supports the following measures: -
- a). Police should exercise powers (Confiscation of Alcohol (Young Persons) Act 1997) to remove alcohol from young people on the street

b). Police and trading standards should implement test purchasing to reduce sales to under 18s in on and off sales licensed premises

c). Further take-up of proof of age schemes will be promoted

d). In-house, mystery shopper type schemes operated by local businesses will be supported

e). Providers of events specifically catering for unaccompanied children should consider whether all staff at such events need to be DBS checked

f). Use of a PSPO in the City Centre

9.1.4 The licensing authority will not seek to require that access to any premises is given to children at all times – under normal circumstances this will be left to the discretion of the licensee. The following areas give rise to concern in respect of children, who will normally be excluded from premises:

- where there have been convictions for serving alcohol to minors or with a reputation for underage drinking;
- with a known association with drug taking or dealing;
- where there is a strong element of gambling on the premises;
- where entertainment of an adult or sexual nature is commonly provided;
- where premises are used primarily or exclusively for the sale and consumption of alcohol and there is little or no seating for patrons.

Options may include:

- limitations on the hours when children may be present;
- age limitations (below 18);
- limitations or exclusions when certain activities are taking place;
- requirements for an accompanying adult;
- full exclusion of people under 18.

9.1.5 Licensees of premises giving film exhibitions will be expected to include in their operating schedules arrangements for restricting children from viewing age restricted films. Such premises will be subject to a mandatory condition requiring that access will be restricted to only those who meet the required age limit in accordance with any certificate granted by the British Board of Film Classification,

9.1.6 Where children are expected to attend a public entertainment, appropriate adult supervision will be required to control the access and egress of children and to protect them from harm. This will normally be an adult member of staff for every 100 children. Where the entertainment is music and dancing, 2 persons, licensed by the Security Industry Authority (door supervisors) should be employed for every 100 children but will be subject to advice within the Event Safety Guide. Nothing in this policy shall seek to override child supervision requirements contained in other legislation or regulations. For exclusively under 18 events

reference should be made to police guidelines (available from the Police Licensing Unit, Brighton tel. 101). The licensing authority recognises the Director of Children's Services as being competent to advise on matters relating to the protection of children from harm. Applicants shall copy their applications to the Director of Children's Services in its capacity as the responsible authority. Copies should be sent care of the Police. The "What to do" booklet is a national one and can be accessed at: www.brightonandhovelscb.org.uk/wp-content/uploads/What-to-do-if-a-child-is-being-abused.pdf If you are concerned about a child locally to contact the Multi-Agency Safeguarding Hub (MASH) on 01273 290400, or you can contact Sussex Police on 101. If they think a child is in immediate danger to dial 999.

- 9.1.7 Trading standards and the police undertake ongoing enforcement operations around under-age sales and test purchasing. Sussex Police and BCRP undertake work concerning proxy purchases and counterfeit ID as part of the partnership support work with Community Safety and Trading Standards.
- 9.1.8 Trading standards have a programme of business support including training for local businesses to avoid underage sales. Trading standards offer business support including for local businesses to avoid underage sales. The training also covers identifying fake ID's, Challenge 25, intoxication, proxy purchasing and implementing due diligence measures.
- 9.1.9 Trading Standards also supplies business support materials guidance and advice on the enforcement penalties on all age restricted products for example vapes, tobacco, fireworks etc.

10. Integration of Strategies

- 10.1 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 Sussex Police, Community Safety Partnership Board, sustainability commission representatives and following the guidance in community safety and crime and disorder strategy
 - Liaising and consulting with Public and Drug and Alcohol Programme Board
 - Liaising and consulting with the East Sussex Fire & Rescue Service
 - Liaising and consulting with the Safety Advisory Group (Emergency Planning)
 - 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
- 10.1.1 In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between all people. This includes people who share protected characteristics,

including but not limited to LGBTQIA+ people, disabled people, people from diverse ethnic and cultural backgrounds and people of all faiths and none.

10.1.2 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.

10.1.3 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.

10.1.4 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.

10.1.5 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.

10.3 Enforcement

10.3.1 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.

10.3.2 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 considered 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 the CSA and the SSA

Matters that would normally be expected in operating schedules:

- A general knowledge and understanding of the Licensing Act 2003 (The Act).
- The adoption of a policy (e.g. Challenge 25) with acceptable proof of ID.
- A smoking policy which includes an assessment of noise and litter created by premises users
- The use of reusable plastic and 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
- Keep and maintain 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. With access available to individuals working on the premises.
- A documented equalities and inclusion policy framework that demonstrates a commitment to creating a fair, diverse, and inclusive environment.
- Policies for dispersal of customers which may include signage regarding taxi services', telephone numbers and advice to respect neighbours and minimise noise, this also includes for customers using external areas.

- Licence holders should have clear documented policies and procedures in place which identify all public safety risks associated with their premises for both customers and staff and measures implemented to prevent, manage and respond to those risks.

Items to which positive consideration would be given:

- membership of Brighton Crime Reduction Partnership
- use of 'NightSafe' 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
- Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance

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, lagers 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
- Appropriate signage and training for the deterrence of proxy sales

Additional Best Practice Measures to be included for consideration, in the CSA

Applications within the CSA will be expected to include in the proposed operating schedule robust additional measures (as appropriate to the nature and location of the venue) which are set out below. These best practice measures place a special emphasis on safety, including measures to tackle drink spiking, preventing intoxication, unwanted sexual behaviour and the use of ID scanners.

Objective	Best Practice Measure/suggested conditions

<p>An understanding of the Licensing Act 2003 (The Act)</p>	<p>Well trained staff will contribute to well run premises and a responsible approach to the sale of alcohol, provision of entertainment and late-night refreshment. Formal qualifications for your staff, either to Personal Licence level or to another appropriate standard recognised by bodies such as the British Institute of Innkeepers (BII) would be preferential</p>
<p>Preventing Intoxication on Licensed Premises</p>	<p>Licence holders must ensure all staff understand their legal responsibilities under the Licensing Act 2003, particularly that serving alcohol to intoxicated persons is an offence.</p> <p>To prevent intoxication occurring on premises, operators should:</p> <ul style="list-style-type: none"> * Avoid promotional activities that encourage customers to drink more than intended or consume alcohol rapidly * Refuse admission to individuals who are already intoxicated upon arrival * Train staff to recognise early warning signs of intoxication, utilising all team members including glass collectors as additional observers, and consider installing mirrors to improve visibility across the premises * Provide staff training covering alcohol's effects and techniques for managing difficult situations, giving them the knowledge and confidence needed to refuse service to intoxicated customers.
<p>A comprehensive Duty of Care Policy to be established in relation to preventing intoxication</p>	<p>Setting out the steps staff should take to prevent intoxication, and the actions required when customers become intoxicated on the premises. This policy should recognise that intoxicated individuals may become separated from friends who would otherwise care for them, making them vulnerable to harm or exploitation.</p> <p>Given Brighton and Hove's diverse community, the policy should specifically address:</p> <ul style="list-style-type: none"> * LGBTQ+ customer safety: Staff should be aware that intoxicated LGBTQ+ individuals may face additional risks including targeted harassment, discrimination, or hate crime * Violence Against Women and Girls prevention: Recognition that intoxicated women and girls are particularly vulnerable to predatory behaviour, with clear procedures for identifying and responding to concerning situations <p>The policy must ensure that no intoxicated person is left unaccompanied or placed in a taxi without appropriate supervision. All premises staff must be familiar with and trained in implementing this policy.</p>
<p>The installation of a digital CCTV</p>	<p>Subject to GDPR guidance and legislation:</p>

<p>system by liaison with, and to a standard approved by, Sussex Police. With access available to individuals working on the premises.</p>	<p>*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 entrance to the premises. The system shall be on and recording at all times the premises licence is in operation.</p> <p>* The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.</p> <p>* CCTV footage will be stored for a minimum of 31 days.</p> <p>* 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.</p> <p>* The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.</p> <p>* Subject to GDPR guidance and legislation, 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 Sussex Police e.g. USB) for the police without difficulty or delay and without charge to Sussex Police.</p> <p>*Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk. Repair records /invoices shall be kept on site for at least 12 months and be readily available to be viewed by all authorised person upon request.</p> <p>* 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.</p>
<p>Incident reporting</p>	<p>An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. The log will be inspected and signed off by the DPS (or a person with delegated authority) at least once a week.</p> <p>* The logbook should 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</p>

	<p>police. An incident will be defined as being one which involves an allegation of a criminal offence.</p>
<p>Security in and around the premises</p>	<p>The employment of SIA registered door supervisors in line with Police recommendations and/or a written risk assessment to supervise admissions and customers inside and outside the premises.</p> <ul style="list-style-type: none"> * SIA badges must be clearly displayed whilst working. * Door staff should sign into a register detailing their full SIA licence number, their name, contact details and the time and date their duty commenced and Concluded * The premises should implement effective security policies to protect staff and customers from conflict, violence and threats in consultation with Sussex Police and ensure staff are adequately trained on these policies. Training records must be accessible for review by police or the Licensing Authority. <p>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.</p>
<p>Brighton Crime Reduction Partnership (BCRP) membership</p>	<p>Premises will become a member of the BCRP or similar scheme approved by the Licensing Authority that operates with radios and uses the Nightsafe & Yellow Card Scheme or similar reporting scheme.</p>
<p>ID scanners</p>	<p>The use of ID scanners where appropriate.</p> <p>The premises shall install a recognised electronic identification scanning system for customers entering the premises. The system shall be operated at all times door staff are on duty and all persons entering the premises will be scanned. The system should have the ability to identify the hologram of an ID and read both Passports and ID cards, including PASS cards. The system should be able to conduct tests to determine if a document is genuine or counterfeit. The system must be compliant with the Information Commissioners good practice guidance for ID scanning in clubs and bars.</p>
<p>Equalities and inclusion policy</p>	<p>A comprehensive, documented equalities and inclusion policy framework that demonstrates the organisation's commitment to creating and maintaining a fair, diverse, and inclusive environment. This framework should encompass clear policies, procedures, and measurable</p>

	objectives that actively promote equality of opportunity, prevent discrimination and harassment, and foster an inclusive culture where individuals from all backgrounds can feel safe. The policy must be regularly reviewed, updated to reflect best practice and legal requirements, and supported by appropriate training and monitoring mechanisms.
Safety of staff and customers	<p>Licence holders should have comprehensive, clearly documented policies and procedures in place which systematically identify all public safety risks associated with their premises for both customers and staff, and detail the robust measures implemented to prevent, manage, and respond effectively to those risks. These policies should encompass risk assessment methodologies, hazard identification protocols, emergency response procedures, staff training requirements, and regular review mechanisms to ensure ongoing compliance with health and safety legislation. The documentation must demonstrate a proactive approach to risk management, including contingency planning for various scenarios, clear allocation of responsibilities amongst staff members, and established communication channels for reporting and addressing safety concerns promptly and effectively.</p> <p>Licence holders should prepare themselves for the implementation of Martyn's Law.</p>
Safety of staff and customers	<p>Preparing for Martyn's Law Requirements</p> <p>Licence holders should familiarise themselves with the requirements of Martyn's Law (the Terrorism (Protection of Premises) Act 2025), which will require certain premises and events to consider how they would respond to a terrorist attack. While the Act will not come into force for at least 24 months, early preparation will help ensure compliance and enhance the safety and security of staff and visitors. The Government will publish guidance during the implementation period to assist in understanding the specific requirements.</p>
Safety for staff	Licensed venues are encouraged to take all reasonable steps to support the safe travel of staff following late-night shifts, including the provision of free or subsidised transport home where appropriate, as part of their duty of care.
Drinking receptacles	The use of reusable plastic and polycarbonate drinking vessels and containers, especially outside areas or after specified hours.
Vulnerability policies and training	All persons working/trading in the night time economy will be aware of the vulnerability of patrons. Patrons are particularly vulnerable when intoxicated through alcohol

	<p>and/or drugs, this includes when they are refused entry or ejected from the premises.</p> <p>There will be a special emphasis on safety, including measures to tackle drink spiking and unwanted sexual behaviour.</p> <p>Every venue will now need to have a clear and actionable policy in place to prevent and respond to drink spiking. This includes staff training, procedures for reporting incidents, and support for victims.</p> <p>Training and initiatives should include;</p> <ul style="list-style-type: none"> • Safety-First Door Policy: Venues will no longer be allowed to eject vulnerable individuals, especially lone adults, without care. Whether someone is intoxicated, separated from their group, or simply in need of help, venues must act responsibly. • Premises to contact the Night Safety Marshalls (NSMs) to assist vulnerable persons to get home safely and get the help they need during the NSM operating hours. • BCRP spiking and vulnerability training • Home Office Spiking training • Implementation of the 'Ask for Angela' scheme or similar initiatives • Training in the use of the Back Off Back Up (Bobu) app and displaying the sticker to show venues are part of the safety network – or similar schemes
Vulnerability policies and training	Awareness of child sexual exploitation, modern slavery and human trafficking indicators.
Drug Use	<p>* A zero tolerance policy to the use of drugs in the premises should be adopted.</p> <p>* Posters can be displayed throughout the premises to remind customers of the zero-tolerance policy.</p> <p>* Refusing entry to anyone who appears to be showing signs of drug use and contacting the emergency services in appropriate circumstances. In such cases, an entry should be made in an incident logbook.</p> <p>* A duty of care policy regarding persons suffering adversely from the effects of drugs should be in place at the premises and staff should be trained on the policy.</p>
Smoking on the premises	Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance,

	including in relation to enclosed (or substantially enclosed) smoking shelters.
Music, singing and speech noise breakout from the premise	A noise management policy should be in place that sets out sound attenuation measures to prevent or control music, singing and speech noise breakout from the premises.
Noise and nuisance from customers arriving and leaving the premises	<ul style="list-style-type: none"> * Reduce the potential for excessive queue lines with a well-managed and efficient door policy. * A customer dispersal policy can minimise noise disturbance to local residents from customers leaving the premises. A policy should clearly set out measures to avoid a mass exit at the end of the evening * Display prominent notices close to the exit doors, requesting patrons to leave the premises and quickly and quietly. * Display prominent signs in external areas such as beer gardens and forecourts asking customers to keep noise to a minimum. * Restrict the use of external areas after a certain time (e.g.10pm) if premises are in a residential area
Smokers outside the premises	<ul style="list-style-type: none"> * Limit the number of smokers permitted outside at any one time after a certain time. * Discourage smokers from loitering outside by not permitting them to take their drinks with them and removing external furniture after a certain time. * Locate smoking areas away from residential premises. * Do not permit customers to congregate on and block the public highway to passers-by
Noise and disturbance caused by deliveries, collections and	Commercial deliveries, collections and storage/ disposal of waste (especially glass), including beer deliveries, refuse collections and storage / disposal of

waste disposal	waste and recyclables in external areas should be restricted between certain times
Children accessing licensed premises	<p>A documented Safeguarding policy setting out measures to protect children from harm should be in place at the premises. The policy should consider all activities associated with the premises including the sale of alcohol and the provision of regulated entertainment and when children should be allowed on or restricted from the premises.</p> <p>* All staff including door staff and bar staff should be trained on the policy.</p>
Underage sales of alcohol	<p>The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.</p> <p>* Signage advertising the 'Challenge 25' policy will be displayed in prominent locations in the premises. *The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling, serving or delivering alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling, serving or delivering of such products and will include:</p> <p>a) The lawful selling of age restricted products – including but not limited to, the requirement of the staff member conducting the transaction to ensure they carry out Challenge 25 checks regardless of any other staff member checks that may already have taken place</p> <p>b) Identifying if a person may be intoxicated and refusal of sale</p>

	<p>c) Vulnerability initiatives and how to respond to potential drink spiking</p> <ul style="list-style-type: none">* 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.* All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
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Note: The above best practice measures are not exhaustive and changes with wording, training providers and organisations may occur over time.

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:02/06/2026

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: 01.06.26

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
2. Appendix B – Proposed Plan of Premises
3. Appendix C – Representations
4. Appendix D – Map of area
5. Appendix E – Applicants responses to Representations

Documents in Members' Rooms

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026
[Statement of Licensing Policy 2026](#)

Home Office, Revised Guidance issued under section 182 of the Licensing Act 2003, February 2026 [Revised guidance issued under section 182 of Licensing Act 2003 - GOV.UK](#)

Public Health Framework for Assessing Alcohol Licensing – July 2025
[Public Health Framework for Assessing Alcohol Licensing | Tableau Public.](#)

Background Documents

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026.
[Statement of Licensing Policy 2026](#)

Appendix A

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

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.
2. Alcohol will be served by waiter/waitress service to persons seated at tables and ancillary to a main table meal only. There will be no vertical drinking.
3. Staff will ensure that customers are aware that if they wish to purchase an alcoholic drink, they need to be ordering a meal.

b) 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. This can be via email - brighton.licensing@sussex.police.uk.
 - h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Police or for any other reason, the premises will be expected to install a replacement hard drive, or a temporary replacement drive as soon as practicable.
5.
 - a) An incident and refusals log (book or electronic) will be maintained by the premises showing a detailed note of incidents and refusals that occur in the premises. The logs will authority) at least once a month.
 - b) The logs should be kept on the premises for at least twenty-four (24) months and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence. Refusals of alcohol for reasons such as underage, no ID and intoxication.

c) Public safety

None

d) The prevention of public nuisance

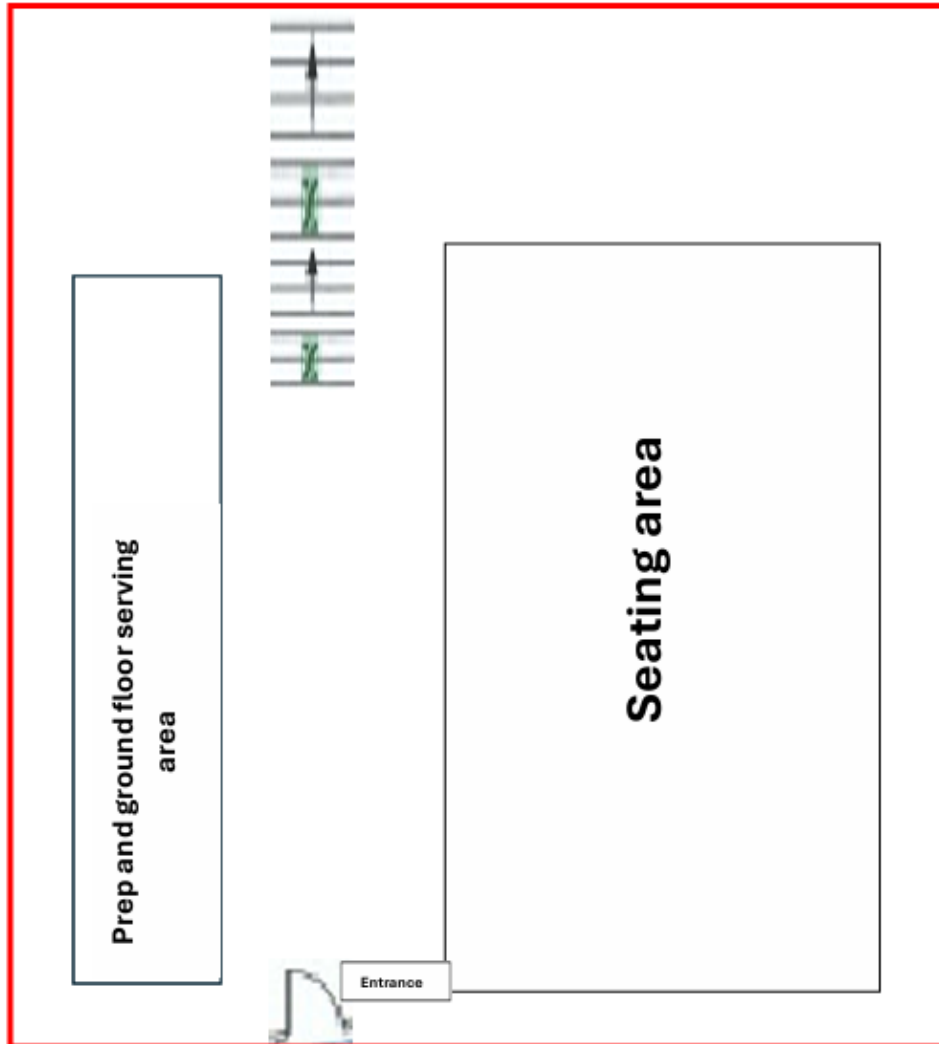
6. Clear signage will remind customers to leave quietly and respect neighbours.
7. Music will be played at background levels only.
8. Deliveries, recycling and rubbish should not be dropped off, collected or placed outside except between the hours of 07:00 and 19:00.
9. No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises that gives rise to a nuisance.

e) The protection of children from harm

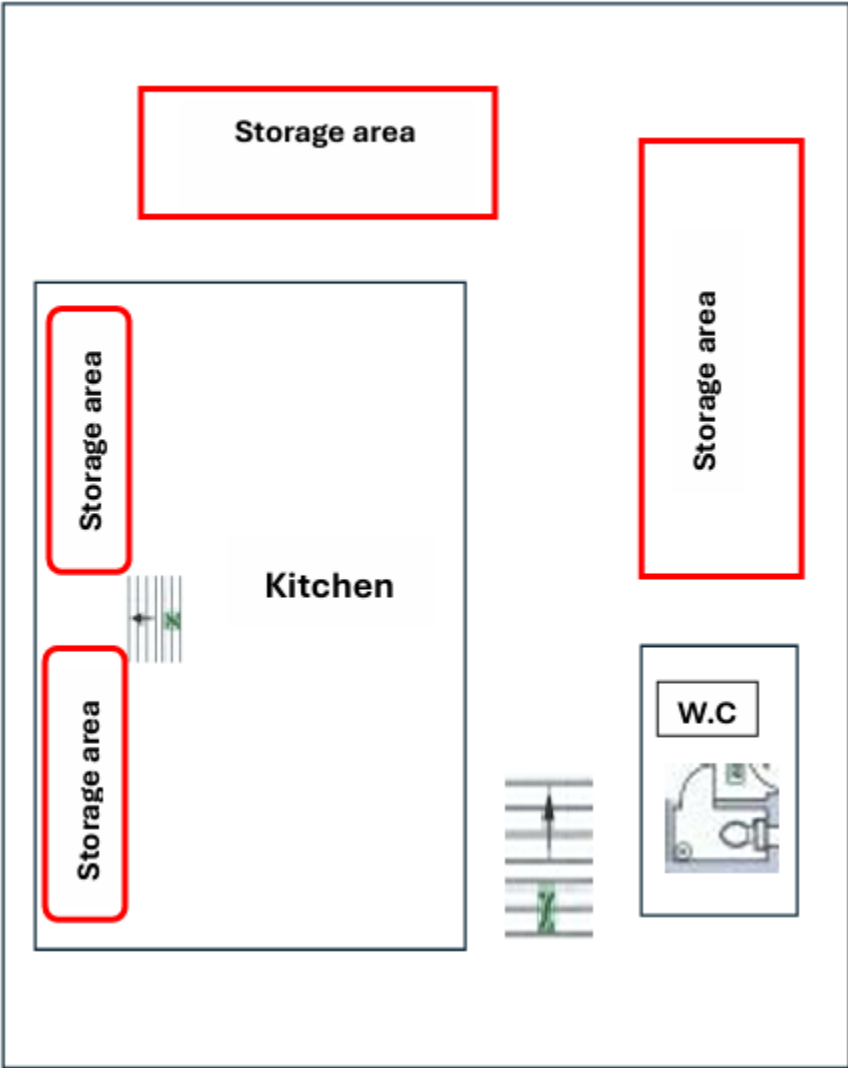
10. The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.
11. Signage advertising the "Challenge 25" policy will be displayed in prominent locations in the premises.
12. a) The Premises Licence Holder / Management shall ensure that all staff members engaged or
to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling and or serving of such products and will include:
 - *The lawful selling of age restricted products – including but not limited to, the requirement of the staff member conducting the transaction to ensure they carry out Challenge 25 checks regardless of any other staff member checks that may already have taken place.
 - *Identifying if a person may be intoxicated and refusal of sale
- b) Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 8 weeks, with the date and time of the verbal reinforcement/refresher training documented.
- c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

Appendix B

Ground Floor



Basement



Appendix C

REP A

DL CON ENDS 20.05.2026 VALID PPN

From: [REDACTED]

Sent: 11 May 2026 11:06

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

Subject: Licence application - 1445/3/2026/01259/LAPREN

Dear Sir/Madam,

Licence application - 1445/3/2026/01259/LAPREN

Residents names: [REDACTED]

Address: [REDACTED]

We are writing to lodge our objection to the grant of the above licence.

Billie's is currently a cafe which, whilst it has a noisy extractor fan, is currently no trouble owing to its hours of trading. It sits next to a pub, the Hampton (also called [REDACTED]), which has a noisy beer garden that backs on to the houses at the top of Hampton place [REDACTED]

If Billie's receives an alcohol licence and an extension in operating hours to 11pm, seven days a week, this will not only be longer than the Hampton's hours (which are shorter on Sunday), but it will also potentially cause a doubling in noise. We also presume that the extractor fan will be on until 11pm, which, along with the increased noise from customers, will make the already difficult task of getting to sleep even harder.

While Brighton itself is busy on the main streets and in the town, I cannot think of another supposedly quiet residential road in either the Montpelier or Clifton areas that has two drinking places next to one another. This will create a different feel (and a differently level of noise) entirely. We hope that both Billie's owner and the council can rethink this.

Yours sincerely,

[REDACTED]

REP B

DL CON ENDS 20.05.2026 VALID PPN

From: [REDACTED]

Sent: 12 May 2026 11:28

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

Subject: Objection to Premises Licence Application 1445/3/2026/01259/LAPREN

Re: Licence Application 1445/3/2026/01259/LAPREN

Dear Sir/Madam

I write to formally object to the granting of the above licence. My objection is grounded in concerns that the proposed extension would materially increase noise levels and contribute to anti-social behaviour in what is predominantly a residential area.

The locality is already served by two nearby establishments that provide food and alcohol, and as such, there is an existing and noticeable impact on the surrounding environment, particularly during evening hours. The addition of a further licensed operation or the expansion of the current one risks intensifying these disturbances and placing an undue burden on residents.

In particular, I am concerned that increased footfall, extended operating hours, and the potential for outdoor congregation will lead to heightened noise pollution and disruption. Taken together, these factors are likely to adversely affect the quality of life and overall well-being of those living in close proximity.

For these reasons, I respectfully submit that granting this licence would not be appropriate in this context, and I therefore strongly object to the application.

[REDACTED]
[REDACTED]

REP C

DL CON ENDS 20.05.2026 VALID PPN

Dear Sir/Madam

Re: Licence Application 1445/3/2026/01259/LAPREN

Objection made by [REDACTED]

I am writing to formally object to the Council approving the application for the above licence at Billie's Cafe.

I have lived in [REDACTED] and have been happy to have Billie's Café, open in the daytime, in the locality. However, I think an alcohol licence and extension of opening hours is not appropriate because this would materially increase local levels of noise and could contribute to anti-social behaviour in the neighbouring residential area.

The area is already served by two nearby pubs and another venue at the bottom of Hampton Place, due to open shortly, which provide food and alcohol. An additional licensed venue is a venue too far.

I am concerned that the increased activity, extended opening times and the likely outdoor congregation of people will lead to increased noise, particularly at night. These factors, taken together, are likely to adversely affect the quality of life and overall wellbeing of those living in this area.

I see no reason for the Council to pass on full details of objectors, including names and addresses. Identities and addresses of those objecting can be verified by the Council, and making it a requirement that these should be made available to the applicant could deter objections being made.

Equally, I think the Council should post applications of this kind in visible local areas so that people are aware of applications of this type and can contribute to the debate and decisions on what happens in their neighbourhood.

Finally, the licensing team is in a position to check whether the original planning approval for Billie's Café, over 40 years ago, contains any restrictions on future use development. I have written to the Planning Department but will not receive any information on this before the consultation deadline passes.

Yours faithfully

[REDACTED]

REP D

DL CON ENDS 20.05.2026 VALID PCD & PPN

From: [REDACTED]

Sent: 15 May 2026 23:10

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

Subject: 1445/3/2026/01259/LAPREN

Hi

I am writing to object to the alcohol licence application for Billies cafe at 34 Hampton place Brighton BN1.

I live at [REDACTED] which is meant to be a residential street. I feel that there are all ready plenty of licence premises in the area. A restaurant at the bottom of Hampton place and both The Hampton Pub and The Windmill pub on Upper North Street all within in a radius of 300 feet. Not to mention all the shops restaurants and supermarkets on the Western road with drinks licenses. There is a lot of anti social behaviour already in this area relating to both drink and drugs. I also feel that there will be added traffic noise from possible delivery mopeds that already plague our streets.

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

REP E

DL CON ENDS 20.05.2026 VALID PCD, PPN & PCH

From: Cllr Alison Thomson <Alison.Thomson@brighton-hove.gov.uk>

Sent: 19 May 2026 21:43

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

Cc: Brighton.Licensing <brighton.licensing@sussex.police.uk>

Subject: Objection to licensing application 1445/3/2026/01259/LAPREN Billie's Café, 34 Hampton Place, Brighton BN1

Dear all, as ward councillor I would like to object to this application on the following grounds:

1. Prevention of Public Nuisance

The application is in the Montpelier and Clifton Hill Conservation Area, comprised of narrow residential streets with largely terraced homes, occupied by families with children, professional people and pensioners, many of whom live alone. There is limited Z zone permit parking. There is already a high concentration of licensed premises in Upper North Street and Montpelier Terrace. The Windmill Inn has an outside seating area that results in significant disturbance to neighbouring properties.

The addition of a further licensed premises would inevitably increase:

1. Noise from customers congregating outside
2. Disturbance from 11:00 am to 11:00 pm from voices, music, and increased vehicle activity as customers either park nearby or get picked up or dropped off at the premises
3. General anti-social behaviour associated with alcohol consumption

Given the confined nature of the nearby residential streets, noise reverberates and is particularly intrusive to nearby residents. As it is a conservation area, few residents have double glazing and so they are particularly exposed to noise.

2. Prevention of Crime and Disorder

The Police have advised those who live in Upper North Street to install Ring doorbells for our personal safety because of theft, property damage and the concentration of alcohol-led disturbances in this immediate area. One resident reports a brawl opposite her home. I was particularly concerned about knife crime. She has also made two complaints to the Police for damage to her property from paint thrown at her front door. She lives alone without off street parking, often has to walk home alone from wherever she has been able to park her car on poorly lit streets. As she owns an EV, she has to walk to and from a charger, again in the dark and on poorly lit streets. These people feel particularly vulnerable to crime and disorder.

Increasing the number of licensed premises in a residential, conservation area risks:

1. Intensifying alcohol-related disorder
2. Increasing pressure on policing resources
3. Encouraging movement of drinkers between premises (“pub-hopping”), prolonging disturbance
4. Increasing the anxiety experienced, particularly by pensioners living alone, to the risk of exposure to crime and disorder

She is also concerned that the cumulative impact of multiple venues in such close proximity in a residential area has not been adequately addressed. In her view, this is totally inappropriate.

3. Protection of Children from Harm

The area is residential and used by families, visitors and tradespeople. There are two primary schools nearby. Most residents have purchased visitors’ permits from the council to allow our visitors and tradespeople to park. Upper North Street is the main walking street leading to and from these schools, the bus stops at Churchill Square and the Clock Tower, and the train station. Hampton Place, Spring Street, Dean Street and Marlborough Street are the main walking streets to the beach and shopping areas. Introducing alcohol into what is currently a daytime café environment risks changing its character and exposing children to the following:

1. Increased alcohol consumption behaviour as they walk home from school in the afternoon and to and from their various after-school activities
2. Likely disorder associated with drinking environments

I would like to attend the hearing on June 16 to raise these concerns to the panel. Please let me know what the procedure is.

Kind regards,

Alison Thomson
Labour councillor, Regency ward
Chair of Planning

REP F

DL CON ENDS 20.05.2026 VALID PCD & PPN

From: [REDACTED]
Sent: 30 April 2026 12:39
To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>
Subject: (1st Ack sent out) Licence- 1445/3/2026/01259/LAPREN

Dear All,

Regarding Licence- 1445/3/2026/01259/LAPREN

My name: [REDACTED]

Address: [REDACTED]

I am objecting to the grant of the above as this would cause an increase in noise pollution and anti-social behaviour in a residential area which is already served by 2 pubs serving food and alcohol in the immediate vicinity. The approval of this licence would have a detrimental effect on the wellbeing of local residents, therefore I strongly object.

Furthermore I would like to enquire as to why we were not notified by email or post of this. The notice on the window does not have the licence reference number neither, I consider this poor communication from the licensing team and I ask that all licence applications are emailed or posted to the residents in the relevant area so that we can exercise our rights to object.

Many thanks,

[REDACTED]

REP G

DL CON ENDS 20.05.2026 VALID PPN

Regarding License- 1445/3/2026/01259/LAPREN

To whom it may concern.

Billie's has been a popular 'breakfast' café for several decades and to the best of my knowledge typically closed sometime during the afternoon. It is a welcomed feature of area.

If Billie's were though to now become a restaurant and to serve alcohol from 11 am up to 11 pm, including on Sundays, it would totally change the impact it has been having on Hampton Street and Hampton Terrace.

I write to object to the alcohol license being granted and to it extending trading hours up to 11 pm, which would more likely be 12 pm if they are to serve liquor up to 11 pm.

My reason is the late-night noise this would surely bring. Not only noise from the restaurant itself but also from customers leaving it at up to 12 pm standing outside chatting and making their ways home down to Western Rd. This would especially impact those living in close proximity to Billie's at the top of Hampton Place,

Despite being close to the center of town, Hampton Place remains a relatively quite residential street and as a resident of that street, with children, I would like it to remain that way.

May I add that the notice that is being displayed in the window regarding the license application had no reference number on it.

Yours truly,

Name: [REDACTED]

Address: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Appendix D



APPENDIX E

RESPONSE TO REP A

From: hani abadi REDACTED

Sent: 22 May 2026 02:39

To: REDACTED

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

Subject: Licence application - 1445/3/2026/01259/LAPREN

Dear REDACTED

Thank you for sharing your thoughts regarding our recent licence application. As a long-standing member of this community, I completely understand and respect your desire to protect the peaceful, residential character of Hampton Place. Because we care deeply about our neighbours, I wanted to reach out personally to clarify exactly what this application means for the area and correct a few misconceptions.

First and foremost, Billies is applying for a restaurant licence, not a bar or pub licence. This is a crucial distinction: alcohol will strictly only be served to customers who are sitting down and ordering a substantial meal. We have absolutely no intention of operating as a drinking-only establishment or adding to the area's nightlife.

I also want to reassure you regarding noise and anti-social behaviour:

Billies has been an established business in Brighton for over 35 years, and I have personally owned and run it for more than 14 years. In all that time, we have worked very closely with Brighton & Hove City Council and have a spotless record—never receiving a single noise or disturbance complaint from our neighbours.

To be transparent with you, the current economic climate has been incredibly difficult. Like many independent businesses, Billies is currently struggling to keep its doors open. We are applying for this licence purely to adapt and survive. Closing down would not only mean losing a neighbourhood staple, but it would directly impact our staff—all of whom are local residents working hard to provide for their families in these tough times.

We pride ourselves on being a positive force in Brighton. Beyond our standard trade, Billies has worked hand-in-hand with the City Council since 2020 to supply food to the local homeless population four days a week. We love this city and this neighbourhood, and we would never support anything that compromises it.

I hope this reassures you that our plans will not contribute to the issues you mentioned, but will instead help ensure a long-standing local business can continue to serve the community.

Regards,

Hani Abadi
Owner, Billies Cafe
34 Hampton Place, Brighton

RESPONSE TO REP B

From: hani abadi REDACTED

Sent: 22 May 2026 02:45

To: REDACTED

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

Subject: Licence application - 1445/3/2026/01259/LAPREN - 34 Hampton Place

Dear REDACTED

Thank you for sharing your thoughts regarding our recent licence application. As a long-standing member of this community, I completely understand and respect your desire to protect the peaceful, residential character of Hampton Place. Because we care deeply about our neighbours, I wanted to reach out personally to clarify exactly what this application means for the area and correct a few misconceptions.

First and foremost, Billies is applying for a restaurant licence, not a bar or pub licence. This is a crucial distinction: alcohol will strictly only be served to customers who are sitting down and ordering a substantial meal. We have absolutely no intention of operating as a drinking-only establishment or adding to the area's nightlife.

I also want to reassure you regarding noise and anti-social behaviour:

Billies has been an established business in Brighton for over 35 years, and I have personally owned and run it for more than 14 years. In all that time, we have worked very closely with Brighton & Hove City Council and have a spotless record—never receiving a single noise or disturbance complaint from our neighbours.

To be transparent with you, the current economic climate has been incredibly difficult. Like many independent businesses, Billies is currently struggling to keep its doors open. We are applying for this licence purely to adapt and survive. Closing down would not only mean losing a neighbourhood staple, but it would directly impact our staff—all of whom are local residents working hard to provide for their families in these tough times.

We pride ourselves on being a positive force in Brighton. Beyond our standard trade, Billies has worked hand-in-hand with the City Council since 2020 to supply food to the local homeless population four days a week. We love this city and this neighbourhood, and we would never support anything that compromises it.

I hope this reassures you that our plans will not contribute to the issues you mentioned, but will instead help ensure a long-standing local business can continue to serve the community.

Regards,

Hani Abadi
Owner, Billies Cafe
34 Hampton Place, Brighton

RESPONSE TO REP D

From: hani abadi REDACTED

Sent: 22 May 2026 02:02

To: REDACTED

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

Subject: Alcohol Licence Application, Billies Cafe

Dear REDACTED

Thank you for sharing your thoughts regarding our recent licence application. As a long-standing member of this community, I completely understand and respect your desire to protect the peaceful, residential character of Hampton Place. Because we care deeply about our neighbours, I wanted to reach out personally to clarify exactly what this application means for the area and correct a few misconceptions.

First and foremost, Billies is applying for a restaurant licence, not a bar or pub licence. This is a crucial distinction: alcohol will strictly only be served to customers who are sitting down and ordering a substantial meal. We have absolutely no intention of operating as a drinking-only establishment or adding to the area's nightlife.

I also want to reassure you regarding noise and anti-social behaviour:

Billies has been an established business in Brighton for over 35 years, and I have personally owned and run it for more than 14 years. In all that time, we have worked very closely with Brighton & Hove City Council and have a spotless record—never receiving a single noise or disturbance complaint from our neighbours.

To be transparent with you, the current economic climate has been incredibly difficult. Like many independent businesses, Billies is currently struggling to keep its doors open. We are applying for this licence purely to adapt and survive. Closing down would not only mean losing a neighbourhood staple, but it would directly impact our staff—all of whom are local residents working hard to provide for their families in these tough times.

We pride ourselves on being a positive force in Brighton. Beyond our standard trade, Billies has worked hand-in-hand with the City Council since 2020 to supply food to the local homeless population four days a week. We love this city and this neighbourhood, and we would never support anything that compromises it.

I hope this reassures you that our plans will not contribute to the issues you mentioned, but will instead help ensure a long-standing local business can continue to serve the community.

Regards,

Hani Abadi
Owner, Billies Cafe
34 Hampton Place, Brighton

RESPONSE TO REP E

From: hani abadi REDACTED

Sent: 07 June 2026 03:09

To: Cllr Alison Thomson <Alison.Thomson@brighton-hove.gov.uk>

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

Subject: Regarding Licensing Application 1445/3/2026/01259/LAPREN

Dear Councillor Thomson,

Thank you for sharing your representation regarding our recent licence application. As a long-standing business owner in this community, I completely understand and respect your desire to protect the peaceful, residential character of the Montpelier and Clifton Hill area. Because I care deeply about our neighbours, I wanted to reach out personally to clarify the intent behind this application and address the concerns you raised.

First and foremost, I want to reassure you that the operational model for Billie's will remain firmly that of a seated café and restaurant, not a bar or a pub. We have absolutely no intention of operating as a vertical drinking establishment or contributing to nightlife disturbances.

Regarding noise and anti-social behaviour, Billie's has been a quiet staple of Hampton Place for many years, and I have personally owned and operated the business for over a decade. In all that time, we have maintained a flawless record, working closely with Brighton & Hove City Council and never receiving a single noise, safety, or disturbance complaint from residents.

To be transparent with you, the current economic climate has been incredibly challenging for independent hospitality businesses. Like many local venues, Billie's is navigating these pressures, and we are seeking this licence purely to adapt, evolve our evening dining offer, and survive. Closing our doors would not only mean losing a long-standing neighbourhood asset, but it would directly impact our dedicated staff, the majority of whom are local residents.

We pride ourselves on being a positive, responsible force in Brighton. Beyond our standard trading, Billie's has worked hand-in-hand with the City Council since 2020 to regularly supply food to the local homeless population. We love this city and this neighborhood, and we would never introduce an environment that compromises its safety or character.

I hope this reassures you of our intentions and demonstrates that our plans will not contribute to the issues you highlighted.

Regards,

Hani Abadi
Owner, Billie's Café
34 Hampton Place, Brighton

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