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Mr Ref. DCS/104/20/LA

Environmental Services & Licensing
Brighton & Hove City Council
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Dear All,

I am writing this at a time which is without precedent. To remind you of my background and hence why I think I should be allowed to voice my opinions to all of you I served in Sussex Police from 1962 until 1996 and from 1989 was the Licensing Inspector totally responsible for running the Brighton Licensing Project with a team of well trained officers and in such a way that it was recognised as a National good practice and copied by many other police forces.

Partnership working was a critical key to this and working with the courts we introduced training for licensees which included the first BII Certificates in 1994. Working with the your council we jointly introduced changes to the PEL conditions and the requirement for Door Supervisor Training for all door staff registered with the council and ran those course until the SIA legislation took over.

In 1996 I retired from the police and took up the role of a Licensing Consultant and Tutor for all the BII courses and the door training some of which I helped to write the manuals for. I continue in these roles to the present day and although the work load has altered considerably over the years I have made many hundreds of applications in Brighton and Hove as well as across the country and trained several thousands of Licensees.

During those years I have seen many ups and downs in the trade following the changing economics of the country and of course major changes in legislation. It is important to remember that the Hospitality Trade is the third largest employer in the country with the vast majority of venues being licensed premises. Locally it is a major attraction in respect not only of our local population but also the vital tourism trade.

Directors Doug Simmonds FBII tp. & Sue Simmonds
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With the current coronavirus pandemic, premises have had to close quite rightly so, but my concern is that these businesses will sadly fail in many cases and we will see premises licences lost as a result despite some of the protection being put in place by Government legislation. Published figures at the moment suggest in excess of 800,000 businesses will fail in the UK

In my view this could lead to a serious depletion of licensed premises for the future with an extended effect of the crisis as a result and serious economic outcomes, not only to the businesses but our working population and the City as a whole. I believe that there is a need therefore to urgently consider current licensing policy and the cumulative impact and stress zones in place.

I am not suggesting they should be removed completely but current policy tends to reject new applications which are there in effect to replace those lost, while I see no need to increase the total number of current premises I would seriously like to see some consideration about relaxation where it can be shown that the application is not increasing but replacing previously existing premises in order to build the economy back for everybody involved.

The current Licensing Policy is due for review and your Licensing Committee needs to debate and consider the long term outcomes it will have if it continues as it currently is in place. While the changes needed may seem radical I would suggest that with the right changes in policy in place it could be managed would not increase the loads on Licensing Objectives and hence problems that are perceived as the outcomes.

Should this be considered worthy of some debate then I am willing to contribute further but this is intended to be an initial suggestion with food for thought.

Can I wish you all well and keep safe

Yours sincerely

Doug Simmonds FBII.