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

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

We recognise that our premises is located in Brighton & Hove's cumulative impact zone (CIZ) and as such is subject to licensing policy 3.1. We believe, however, that this application should be an exception to the CI policy for the following reasons.

The premises is a convenience store. The very term 'convenience' confirms that the expectation of customers is that they will be able to purchase all their food and drink items in one place. Customers are no longer happy to buy meat in a butcher's, bread in a bakery, vegetables in a greengrocer's and alcohol in an off licence: they expect to be able to purchase all such items in one place for their *convenience*. Convenience stores which do not offer an alcohol option are therefore at a business disadvantage and will therefore be more likely to succumb to local competition as customer loyalty will transfer to other premises which offer purchasing *convenience*. In short, the success of any convenience store is its ability to provide a wide selection of grocery and household items which necessarily includes the sale of alcohol.

As previously mentioned, this premises is **not** a specialist off licence. As such, and further to licensing policy 3.1.9, alcohol will comprise only 10% of the shop's overall stock provision thus confirming alcohol sales are not the premises' primary activity. Given the small percentage of alcohol stock available we do not anticipate that our shop will become a destination for individuals seeking to buy alcohol on its own. Our expectation is that the majority of alcohol purchases will form part of customers' larger grocery shop. This serves to address the concerns detailed in licensing policy 3.1.7.

In response to the best practice approach indicated at licensing policy 3.5.3 our operating schedule addresses these concerns. Robust proposals detailed below are designed to comply with and address the concerns outlined in licensing policy 3.5.3.

We are confident that the matters detailed above and the robust proposals which follow demonstrate our commitment to promoting the licensing objectives thus mitigating any potentially adverse impact upon cumulative impact. We hope that the licensing authority recognises that small businesses form a vital part of Brighton & Hove's overall economy. Small businesses bring prosperity to the city by attracting visitors and serving the local community.

We contend, therefore, that this application should be considered an exception to Brighton & Hove's CI policy and we respectfully urge all relevant parties to support, rather than oppose, our application.

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1 All staff shall be suitably trained for their job function for the premises. Such training shall include alcohol awareness. All new staff shall be trained within two weeks of commencing employment. The training shall be written into a programme ongoing and under constant review and shall be made available to a relevant responsible authority when called upon.

**b) The prevention of crime and disorder**

2 A properly specified and fully operational CCTV recording system shall be installed, operated and maintained to the satisfaction of Sussex Police and the licensing authority. The CCTV system shall incorporate a camera covering each of the entrance doors and shall be capable of providing an image which is regarded as *identification standard* of all persons entering and/or leaving the premises. The CCTV system shall be in

operation at the premises at all times when the premises are used for the provision of licensable activity. All CCTV recordings shall be securely stored for a minimum of thirty-one days. A staff member from the premises who can operate the CCTV system shall be on the premises at all times when the premises are open to the public. This staff member shall be able to show Police recent data or footage with the absolute minimum of delay when requested. Signage indicating that a CCTV recording system is in operation shall be displayed prominently in the premises.

3 Any person entering the premises who appears to be under the influence of alcohol or illegal drugs shall in the interests of other members of the public using the premises be requested to leave the premises.

4 A premises incident book shall be kept at the premises. This book shall be maintained and kept for a rolling period of 12 months. The incident book shall record all incidents which may have occurred which are relevant to the supply of alcohol and the promotion of the licensing objectives. Such incidents shall include, but not be limited to, complaints made to the premises alleging nuisance or anti-social behaviour by persons attending or leaving the premises and all refusals to sell alcohol. The incident book shall be readily available for inspection by an authorised person upon reasonable request.

5 All drinks promotions shall be risk-assessed to ensure the promotion is not irresponsible. Each risk-assessment shall consider the nature of the premises, the nature of the promotion including the size and duration of any discount and the type of customer potentially attracted by the promotion.

6 High-strength lagers, beers and ciders, i.e. those with an ABV above 6.0%, shall not be sold at the premises.

7 Alcohol shall not be placed on display close to the exit door.

8 All spirits shall be restricted from direct public access.

9 All cans of beer, lager and cider in containers containing less than 500ml shall not be sold in single cans. A multipack containing a minimum of four cans shall be the only permitted purchase method.

10 The premises licence holder shall become a member of the Brighton & Hove Business Crime Reduction Partnership (BCRP) or other suitably accredited scheme where appropriate.

### **c) Public safety**

11 All exit routes and public areas shall be kept unobstructed, shall have non-slippery and even surfaces, shall be free of trip hazards and shall be clearly signed.

12 No accumulation of combustible rubbish, dirt, surplus material or stored goods shall be permitted to remain in any part of the premises except in an appropriate place and of such quantities so as not to cause a nuisance, obstruction or other safety hazard.

13 Regular checks and maintenance shall be carried out on all equipment, electrical installations, emergency lighting and fire alarms and equipment to ensure their continued safe operation. A written record of these checks shall be kept and made available to an authorised officer of the licensing authority.

14 The premises licence holder shall ensure that a suitable fire risk assessment and emergency plan is in place at all times.

15 The premises licence holder shall ensure that an electrical compliance check is made at least once a year.

### **d) The prevention of public nuisance**

16 Signage requesting customers to be respectful of others when entering or leaving the premises shall be installed in a prominent position by the premises' exit.

17 The premises' frontage shall be regularly monitored to keep it clean and clear of litter.

18 Signage shall be prominently displayed in the premises requesting that customers take home any alcohol they have purchased to consume it rather than consume it in the street.

19 Arrangements shall be put in place to ensure that waste collection contractors do not collect refuse between 19:00 and 07:00.

### **e) The protection of children from harm**

20 A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are the following recognised photographic identification cards: a driving licence, a passport, a military identification card or a Proof of Age card carrying a 'PASS' hologram.

21 All occasions when persons have been refused service shall be recorded in the incident book. This record shall include:

- the date and time of the incident
- a description of the person seeking to buy alcohol
- the name of the staff member who refused the sale
- the reason the sale was refused

The record must be made available for inspection when requested by an officer of a Responsible Authority.

22 The exterior area to the front of the shop shall be clearly visible from within the premises to aid the prevention of potential alcohol proxy sales.

