

Dear Hannah Staplehurst,

Thank you so much for your email,

I am writing to you in response to your email dated on 10/10/2024 police Proposed Conditions. Here are the key points in your letter (in black) and my reply (in blue and red):

### **Station Grill, 62 Queens Road, Brighton Proposed Conditions**

#### **General**

**1-** Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.

#### **1- Agreed**

**2-** The premises will operate as a restaurant until 23:59pm. From Midnight (00:00) until close the premises will be closed to customers (there will be no takeaways or eating in after that time), The premises door will be locked during these times and opened only to allow delivery persons to collect orders. and only deliveries will take place. Clear signage will be placed on the door to advising potential passing customers that the premises is closed.

**2-** I mentioned the following in my previous letter to the fire authority (which you mentioned that you have read it)

the business will stop serving customers **dining in** on the premises at 11:59 pm, and Signs on the doors would confirm that the business is closed to “walk-in” customers after 11:59 pm. the restaurant would offer deliveries (on electric bikes, electric vehicles, cars and mopeds) from 11:59 pm using either our own staff or a delivery service such as Deliveroo, Just Eat or Uber Eats for this purpose for deliveries. Asking delivery drivers to use designated loading bays which are immediately outside the restaurant, so they can park / waiting legally and properly and not causing a public nuisance by way of obstructing the highway or footpaths. as a result, the existence of a delivery service will draw customers away from the town centre, rather than into it.

Also, will offer collection services for customers already exciting in the city centre, like taxi drivers who will be able to use the designated loading bays which are immediately outside the restaurant, Brighton station staff who finish work after midnight, travellers who arrive Brighton station on the last trains from London , or want to catch the last train to London from Brighton station and night shifts bus drivers who need a fresh healthy food after midnight.

So, the restaurant door will be closed to the customers so they will not get inside, and staff will only give the food orders to delivery drivers, takeaway or for collection only customers. **EAT IN, ENTRY TO THE RESTAURANT OR DINE IN WILL NOT BE ALLOWED.**

Furthermore, NO deliveries will be made to people who were out on the street or in parks or playing fields. Clear signage will be placed on the door to advising potential passing customers that the premises is closed for eat in after midnight.

**3-** All delivery orders shall be to a registered residential or business address. There shall be no deliveries to public/communal areas or open spaces.

### 3- Agreed

#### **Prevention of crime & 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 - [brighton.licensing@sussex.police.uk](mailto:brighton.licensing@sussex.police.uk).

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

4- a, b, c, d, e, f, g, and h Agreed

**5-** SIA licensed door supervisors shall be employed on any other occasions when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. The written risk assessment will take into account information or guidance offered by the police, and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.

5- SIA licensed door supervisors shall be employed **if required**, and it will depend on the security levels on that time, and also if required by the police. Because requiring door supervisors based on a general risk assessment is disproportionate for a smaller business like this. **the premises will NOT sell alcohol , and will not host dancing or normal parties , or too many people on the same time especially after midnight , and will be closed to anybody to dine in, as a result it will not attract the kinds of risks associated with large or high-capacity venues or venues that sell alcohol.**

So, it is better to rely on the other (exciting) security measures, such as an enhanced CCTV system, staff training in conflict resolution, well trained staff on how to de-escalate any problem behaviour. And no one will be allowed to dine in or even enter the premises after midnight, this as an alternative to employing SIA-licensed door supervisors.

Furthermore, because nobody will be allowed to enter the premises after midnight anyway, risk assessment process should be applied only to particularly high-risk events instead of requiring security for all days. And will be updated after specific incidents or in direct response to police advice. The premises will provide better lighting, improved signage, and more staff, this will maintain security all the time.

**6-** At all times the premises is open to the public, the management will contract the backup services of an approved mobile support unit (MSU) that operates at all times the premises is open to the public, with a minimum of 2 SIA registered Door Supervisors operating from it. A copy of the MSU contract will be retained at the premises and made available for immediate inspection upon request by Sussex Police or Council Officials. The MSU will be accredited by the Brighton Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.

**6-** The premises does not have a high risk of public disorder, violent incidents, or large crowds that would require the constant availability of two SIA-licensed door supervisors , the restaurant attracts a calm, peaceful and respectable clients who are working at the station , taxi drivers or night shift bus drivers , and all of them are professionals and calm. In addition, CCTV coverage, staff training in conflict management, and improving lighting around the premises will enhance safety without the need for external security. **The premises may be able to hire additional security (if required) only when there is a higher risk of incidents.**

- The premises will assist and engage with Police and Council, the restaurant operates at low risk and is not comparable to larger venues like bars or nightclubs, which may require such extensive security measures. **However, to ensuring a backup security presence we may have it as on call services only if required.**
- Furthermore, there are a lot of food premises next door and within few meters from the restaurant and directly next to the restaurant, who are opening after 11:00 pm without employing 2 SIA-licensed door supervisors or even having these extensive security measures. And there weren't any criminal activities occurred in these food premises.
- This isn't a bar or nightclub to have these extensive security measures, especially we are not allowing people to come inside the shop after midnight.
- We will ensure that all times when the premises are for any licensable activity, there are sufficient competent staff on duty at the premises for the purpose of fulfilling the terms and conditions of the license and for preventing crime and disorder.
- Staff will communicate effectively with patrons to maintain a safe and respectful environment and if they notice any disturbances address them promptly and professionally to prevent further disruptions.
- There is a Belgian Chips shop on the same parade (street), 67 Queens Road, Brighton, BN1 3XD. And next-door kebab shop (no: 61) They are operating till 03:30 in the morning without having a SIA registered door staff. **Only** When they operate in a way that customers can consume food and or drink within the venue or any outside seating area, a minimum of 1 SIA registered door staff will operate at the premises.
- Furthermore, a restaurant in 99 north road called Zaf'ron, they also operating till 03:00 in the morning as takeaway and deliveries without having the SIA registered supervisor.
- We also can operate like them in busy times a staff member will be working as a door supervisor on the premises to prevent any crime and disorder. Door Supervisors will be trained and disperse any sort of nuisance that may arise from groups.

- **In our case**, as the restaurant will not operate to let customer consume food and or drink within the venue or even outside seating area. So, we do not need to have SIA registered staff.
- However, in a direct response to the police, where there is concrete evidence for risks, SIA registered door supervisors may be used to control numbers and supervise queues.
- There is also, Chicks in 5 Lewes Road, Brighton, BN2 3HP. They are operating till 05:00 am without having a SIA registered supervisor, as On Friday and Saturday nights the seating in the shop will be put out of use by midnight to limit time spent in the premises. **In our case** we will not use the seating area inside or outside the shop after midnight the whole week.

**7-** The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and night-time economy.

7- joining and maintaining membership in Brighton Crime Reduction Partnership , including the purchase and upkeep of radios, may be disproportionate for a small business like this restaurant , we are not a bar or nightclub , **WILL NOT SELL ALCOHOL** , will not allow people dine in after midnight, we operate mainly during the day for eat in , and only will do delivery, Takeaway and collection after midnight , so We will not allow people to gather after midnight inside the restaurant or even outside seating area and doesn't experience high crime.

The nature of the business does not typically attract the kinds of risks that the BCRP is designed to address. As restaurant will not face the same risks as bars, nightclubs, or other venues that allow people to gather inside. And will not require such crime-reduction measures.

Installing a high-quality CCTV system, training staff in conflict management, and improving lighting around the premises. These could provide an adequate level of crime prevention without the need for formal BCRP membership. The nearby food business like one next door, Belgian Chips do not have all of these extensive security measures.

**8-** (a) 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 a manager at least once a month.

(b) 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

police. An incident will be defined as being one which involves an allegation of a criminal offence.

8- a, and b, Agreed, it may be incident book or electronic log.

#### Prevention of public nuisance

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

9- Agreed

#### Protection of children from harm

**10-** All staff will be trained in:

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

10- Agreed

I hope I covered all, should you need any further explanation, please let me know?

Kind regards

Bahaa Azmy

Director of London Export and Import LTD.

10/10/2024