

REP A

CH CON ENDS 11.07.2025 VALID PPN

From: [REDACTED]
Sent: 27 June 2025 09:35
To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>
Subject: OBJECTION to New Premises Licence Application – Loro's Café, [8c Lewes Road, Brighton, BN2 3HZ](#)

Dear Sir/Madam,

I am writing to formally object to the application for a new premises licence by Ms Florent Gjinaj for Loro's Café at [66 Lewes Road, Brighton, BN2 3HZ](#). The application seeks to permit the sale of alcohol for consumption on and off the premises from 11:00 to 23:00 daily, all week.

My objection is based on the following grounds, which relate to the prevention of public nuisance:

Noise from Customers Leaving Late in the Evening

The proposed licensing hours, extending until 23:00, will inevitably lead to increased noise levels late in the evening from customers leaving the premises. This area, being densely populated with many flats and houses immediately adjacent to and backing onto the premises, is particularly sensitive to noise disturbance. Even general chatter, laughter, and car doors closing, which may seem minor individually, cumulatively create significant disruption to residents' peace and quiet, especially during later hours when people are trying to sleep. This will detrimentally affect the amenity of our residential neighbourhood.

Noise from Extractor Fan and Chimney

The premises' existing extractor fan and chimney at the rear already generate a noticeable level of noise during current business hours. Given the close proximity of numerous residential properties directly backing onto Loro's Café, this noise is clearly audible within homes. Should the premises operate until 23:00, as proposed, the continuous operation of this equipment into the late evening would be utterly intolerable, particularly during the summer months when residents frequently have their windows open for ventilation. This persistent mechanical noise would constitute a severe public nuisance and significantly diminish the quality of life for those living nearby.

Traffic and Obstruction from Delivery Drivers

Delivery drivers already park on the double yellow lines at the side of Subway, opposite the side of Bocana. The granting of this licence would likely increase the number of food delivery drivers, many using large cars, exacerbating existing parking problems. This will not only add to traffic congestion on our narrow residential street but also significantly hinder access for emergency services, posing a serious risk to public safety.

I urge the Licensing Authority to seriously consider these points, as the granting of this licence with the proposed hours would undoubtedly lead to an unacceptable level of noise pollution, public nuisance, and traffic issues for local residents.

Thank you for your time and consideration of my objection.

Yours faithfully,

[Redacted Signature]

[Redacted Address]

REP B

CH CON ENDS 11.07.2025 VALID PCD & PPN

**Corinne Hardcastle
Licensing Officer
Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton, BN1 1JP**

Date: 11th July 2025

Our Ref: LICSIJC

Phone: 07772306953

Email: [REDACTED]

Dear Mrs Hardcastle

Re: Licensing Act 2003 - Representation regarding the application for a New Application for a Premises Licence For: Loro`s Cafe, 66 Lewes Road, Brighton, BN2 3HZ

I refer to the application made by Florenc Gjona, for a new Premises Licence to be issued for the above premises. The Licensing Team, in its role as a Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the prevention of crime & disorder and public nuisance and to uphold our Statement of Licensing Policy (SoLP).

The applicant has applied for a Premises Licence for alcohol for consumption on & off the premises every day 11am – 11pm and opening hours of 7:00am – 11.30pm.

This representation is submitted as there are concerns that the premises is within the Special Stress Area of the city, that can be found in our Statement of Licensing Policy (SoLP) from page 15. The Special Stress Area is of concern to the Licensing Authority because of the relatively high levels of crime and disorder and nuisance experienced within it and we believe that the granting of this application could lead to increased associated issues with regard to crime & disorder and public nuisance in the nearby surrounding area.

The Council's SoLP includes a Matrix Model approach for licensing decisions, which recognises the diverse operation and different risks presented by different classes of licensed premises. It provides a vision of what the licensing authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications.

The Matrix Model, on page 18 of the Council's SoLP, states that in the Special Stress Area, cafes could be granted until 10pm. The policy does state that each application is still considered on its individual merit and there is discretion to depart from the policy where justified. However, departure from the Matrix Model is only expected in exceptional circumstances.

I have seen the agreement the applicant has made with the Police and agreed conditions therein but in light of the above and the fact that this new premises falls within our Special

Stress Area, I invite the Sub-Committee Panel to decide the outcome of this application on behalf of the Licensing Authority and whether the applicant has demonstrated whether there are exceptional circumstances to depart from our policy.

Yours sincerely



Sarah Cornell
Senior Licensing Officer
Licensing Team
Regulatory Services

Sussex Police Agreed Conditions – Loro's Café – Café Style Licence

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.
2. The on sale of alcohol shall be consumption by persons seated at tables via waiter/waitress service with no vertical drinking.
3. Substantial food shall be available at all times that alcohol is offered for sale on these premises.
4. Alcohol is ancillary to other hot and cold non-alcoholic beverages available on the premises.
5. At all times, food menus must be clearly displayed within the premises and include hot food options.
6. When in use the outside terrace area will be monitored by staff to ensure compliance to the licence conditions.
7. Off-sales of alcohol will only be permitted when it forms part of a substantial food order made over the telephone or app/website and delivered to a private or work address. i.e. walk-ins for off sales of alcohol are not permitted.

Additionally, as offered up in the original application or agreed with another responsible authority.

Prevention of crime and disorder:

8. 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.

9. When alcohol forms part of a delivery order, all delivery drivers / riders shall be required to remove helmets and or face coverings whilst picking up items for delivery (excluding any face coverings worn for faith religious reasons) within an area that is covered by CCTV.
10. (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 be inspected and signed off by the Designated Premises Supervisor (or a person with delegated 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.

Additionally, as offered up in the original application or agreed with another responsible authority.

Public safety:

As offered up in the original application or agreed with another responsible authority.

Prevention of public nuisance:

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

As offered up in the original application or agreed with another responsible authority.

Protection of children from harm:

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 for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place.

*Refusing the sale of alcohol to a person who is drunk

(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.

13. 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.
14. Signage advertising the "Challenge 25" policy will be displayed in prominent locations in the premises.
15. In relation to deliveries where alcohol forms part of the order, the premises licence holder will ensure that an age verification policy will apply whereby all 3rd party delivery contractors will ensure that couriers are trained to ask any customer to whom alcohol is delivered to and who appears to be under the age of 25 years, to produce photo ID before being handed the alcohol. Identification being as listed under condition xx.

From: Brighton Licensing <Brighton.Licensing@sussex.police.uk>
Sent: 09 July 2025 14:42
To: Corinne Hardcastle REDACTED EHL Licensing <ehl.licensing@brighton-hove.gov.uk>
Subject: FW: FW: Loro's Cafe, Lewes Road, Brighton

Dear Corinne & EHL,

Re the email trail below, we have come to an agreement on conditions and restricting the off sales.

Based on this we have no representation to make against this application.

Kind Regards

Mark.



Mark Thorogood

Police Licensing Officer
Level 4 PALO Qualification

Brighton & Hove Licensing
John Street, Brighton.

Telephone: REDACTED Mobile: REDACTED

From: GRAHAM HOPKINS
Sent: 09 July 2025 10:12
To: Brighton Licensing ; EHL Licensing
Subject: Re: FW: Loro's Cafe, Lewes Road, Brighton

Good morning again Mark,

I have just spoken to Mr Gjona the Applicant and he accepts the Police worded conditions in full and has already accepted the Police proposed off sales conditions. I hope that will avoid a Police representation. Thank you again.

Kind regards,

Graham Hopkins
GT Licensing Consultants REDACTED