

## APPENDIX C

REP A

CH CON ENDS 21/07/2025 VALID PCD & PPN

**From:** [REDACTED]  
**Sent:** 02 July 2025 09:29  
**To:** EHL Licensing <[EHL.licensing@brighton-hove.gov.uk](mailto:EHL.licensing@brighton-hove.gov.uk)>  
**Cc:** [REDACTED]  
**Subject:** BEER BELLY LTD/ ALCOHOL LICENSE APPLICATION/ 15 VICTORIA TERRACE HOVE BN32WB

Dear [REDACTED]

My wife and I are owners of a buy to let house in [REDACTED]

We object to an alcohol license for the above referenced address for the following reasons.

There are two small supermarkets selling alcohol in very close proximity .. [REDACTED] and [REDACTED]

There are three pubs in very close proximity.. [REDACTED], [REDACTED], [REDACTED].

The combination of on premises and off premises alcohol purchase and consumption is likely to be detrimental to an area where too often already drunken people are noisy way after 10-10.30.

In the lane behind Sussex Road there is a daily load of empty alcohol bottles left every day already which we feel would worsen further.

Tks for considering our views.

Kind Regards,

[REDACTED]  
[REDACTED]

**REP B**

**CH CON ENDS 21.07.2025 VALID PCD, PPN & PCH**

**From:** [REDACTED]  
**Sent:** 09 July 2025 11:14  
**To:** EHL Licensing <[ehl.licensing@brighton-hove.gov.uk](mailto:ehl.licensing@brighton-hove.gov.uk)>

**Subject:** Regulation 25 Notice: BeerBelly [15 Victoria Terrace, Hove BN3 2WB](#)

To Whom it May Concern,

I write in respect of the Regulation 25 Notice for BeerBelly at [15 Victoria Terrace, BN3 2WB](#).

Firstly, within this approximate 250m stretch of mixed residential/commercial road, there are already one supermarket and a shop selling take-out alcohol, two pubs, and two restaurants which also serve alcohol. This is more than enough to service this small local area. Another outlet selling alcohol is absolutely unnecessary.

Secondly, this is a residential area which already suffers from the noise, litter and anti-social consequences of the minority of people who buy alcohol and food take them down to the beach close by but appear incapable of clearing up after themselves. Making alcohol yet more easily available will only encourage this.

Thirdly, facilitating the purchase of take-out alcohol to be drunk on the beach can have dangerous consequences. A number of rescues from the sea have taken place as a result of alcohol misuse.

Fourthly, there is a small grassed area off Victoria Terrace and adjacent to Medina Terrace which is often used by family groups. It is not wise, or suitable, to encourage people to use this area as a spot for drinking alcohol.

Finally, this area also has a number of twittens (between Victoria Terrace and Sussex Road, behind [REDACTED], and between [REDACTED] and [REDACTED]) which are poorly lit and not patrolled by the police or security. There is already an issue there with anti-social behaviour by those who prefer to relieve themselves in the twitters rather than walk the short distance to the public facilities by the [REDACTED]. Encouraging the sale and consumption of yet more alcohol in this vicinity will simply exacerbate this unpleasant behaviour.

For the above reasons, we request you to turn down this application in its entirety.

[REDACTED]

[REDACTED]

REP C

**CH CON ENDS 21.07.2025 VALID PCD, PPN & PCH**

**From:** [REDACTED]  
**Sent:** 10 July 2025 10:20  
**To:** EHL Licensing <ehl.licensing@brighton-hove.gov.uk>  
**Subject:** Fwd: Regulation 25 Notice Beerbelly 15 Victoria Terrace

**Subject:** Regulation 25 Notice Beerbelly 15 Victoria Terrace

To Whom it May Concern,

I write in respect of the Regulation 25 Notice for BeerBelly at 15 Victoria Terrace.

Firstly, within this approximate 250m stretch of mixed residential/commercial road, there are already two shops selling take-out alcohol, two pubs, and two restaurants which serve alcohol. This is more than enough to service this small local area. Another outlet selling alcohol is absolutely unnecessary.

Secondly, there are a large number of residential units close by (due to the area being one of nearly all flats) which already suffer from the noise and anti-social consequences of people being able to buy take-out alcohol and sit out on the beach, which is very close by.

Thirdly, encouraging the buying of take-out alcohol to be drunk on the beach has been proved to have dangerous consequences and a number of rescues from the sea already take place regularly as a result of alcohol misuse.

Fourthly, this area has a child's play area contained within it and is used by a lot of family groups, so it is not a suitable area to encourage people to be drinking larger amounts of alcohol.

Finally, this area also has a number of twitterns running down to the beach which are ill lit and not patrolled by the police or security, where there is already an issue with anti-social behaviour, and the ability for yet more alcohol to be purchased and consumed in these areas will just exacerbate this unpleasant and dangerous environment.

For these reasons, the residents and shareholders of [REDACTED] request that you turn down this application in it's entirety.

Kind regards,

[REDACTED]



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

**Regulatory Services  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP**

Date: 21 July 2025  
Our Ref: ELG/BeerBellyRep  
Phone: 07826 951829  
Email: [REDACTED]

Dear Corinne

**CH CON ENDS 21.07.2025 VALID PCD & PPN (E)**

**Re: Licensing Act 2003 - Representation regarding the application for a New Application for a Premises Licence For: BeerBelly, 15 Victoria Terrace, Hove, BN3 2WB**

I refer to the application made by BEERBELLY LTD for a new Premises Licence to be issued for BeerBelly, 15 Victoria Terrace, Hove. 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 and off the premises from 12:00 to 22:30 Monday to Saturday and 12:00 to 22:00 Sunday. Closing at 23:00 Monday to Saturday and 22:00 on Sunday.

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

Emma Grant  
Licensing Officer  
Licensing Team  
Regulatory Services

REP E

CH CON ENDS 21.07.2025 VALID PCD & PPN

**From:** [REDACTED]  
**Date:** 18 July 2025 at 17:21:10 BST  
**To:** [ehlllicensing@brighton-hove.gov.uk](mailto:ehlllicensing@brighton-hove.gov.uk)  
**Subject:** Regulation 25 —- Alcohol licence application for BeerBelly Ltd, 15 Victoria Terrace, Hove BN3 2WB

Dear Sirs,

I must write to object to the above application on the grounds that as a homeowner living very close to 15 Victoria Terrace we are already overwhelmed by premises selling alcohol for consumption on and/or off the premises

I like a drink myself but within a 250 metre radius of the proposed site we already have 3 pubs, 2 licensed supermarkets & 2 restaurants so we are hardly in need of any more new premises

If you were to walk 5 mins north to Church Road you have another 5 licensed convenience stores/supermarkets, 1 pub & countless restaurants

The proposed site itself is tiny and so if as proposed it licensed for on premises drinking the clients would inevitably spill out onto the pavement on Kingsway causing more noise & possible anti social behaviour to the residents of Sussex Rd ( on the corner of which the site is situated)

I therefore object & would request that I am kept informed of any decisions taken by BHCC re the licence

Regards. [REDACTED]  
[REDACTED]

## **Sussex Police Agreed Conditions for Beer Belly Ltd. 15 Victoria Terrace, Hove –**

### **16<sup>th</sup> July 2025 General:**

1. There will be no sales of any spirits or draft alcohol products 'off' the premises.
2. There will be no delivery service of alcohol 'off' the premises provided under this premises licence.
3. Sales of alcohol for consumption 'off' the premises will only be in sealed containers.
4. All spirits for sale 'on' the premises will be stored securely behind the bar area out of reach and access of members of the public.
5. No beer, lager, cider or perry with an ABV over 6% or above shall be sold at the premises save that this shall not apply to premium beer, lager, cider or perry with an ABV over 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.
6. All wines and spirits for sale under this licence will be of a specialist nature e.g. craft, small batch and/or locally produced.
7. All alcohol will be displayed/stored in full sight of the serving counter in an area covered by CCTV.
8. No alcohol sold by the premises will be permitted to be consumed in the immediate vicinity e.g. if customers go outside to smoke then drinks will remain inside.
9. Should the premises licence holder, Beerbelly Ltd (Company no: 16309427), cease trading at 15 Victoria Terrace, then the licence will be surrendered and any new occupants will need to apply for a new premises licence.
10. Authorised staff employed by Sussex Police shall have free access to all parts of the licensed premises at all times licensable activity is taking place or when open to members of the public, for the purpose of inspection to ensure compliance with the terms and conditions of the premises licence and to ensure the promotion of the licensing objectives.

Additional conditions as stated in original application or agreed with another Agency

### **For the Prevention of Crime and Disorder:**

11. 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 and the fridges/shelves where alcohol is stored. 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 Sussex Police e.g. USB) for the police without difficulty or delay and without charge to Sussex Police.
  - (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](mailto: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.
  - (h) 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.
12. An incident log shall be kept at the premises and must be completed within 24 hours of the incident. It can be in paper or electronic form and will record the following:
- a) all crimes reported to the venue
  - b) any refusals made of alcohol service e.g. underage, intoxication
  - c) all ejections of patrons
  - d) any complaints received concerning crime and disorder
  - e) any incidents of disorder
  - f) all seizures of drugs or offensive weapons
  - g) any visit by a relevant authority or emergency service.
13. The incident log will:
- a) be inspected and signed off by the DPS (or a person with delegated authority) at least once a fortnight.
  - b) 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 or as listed in condition 8 above.
  - c) be used to give feedback to staff to ensure that the log is used on each occasion that a refusal, ejection or incident occurs at the premises and to identify any patterns or trends.
  - d) be kept for a minimum of twenty four (24) months.

14. Signage stating that the premises has a zero tolerance towards drugs will be displayed prominently at all entrances to the premises, and the entrances to all toilets.
15. Regular checks of all toilets will take place on every day that the premises remains open for business. These checks will be documented and records made available on request to Sussex Police and officers of the local community.
16. A documented risk assessment must be produced by the premises and agreed by Sussex Police, which identifies the activities undertaken at the premises and the controls necessary to promote the licensing objectives. It will include a written assessment demonstrating what considerations have been made for both normal day to day activities and any special events or functions which may arise during the year. This document shall be immediately available for inspection by the Police and the Licensing Authority, upon request and reviewed every 12 months. The written risk assessment will include:
  - a) When SIA trained and licenced door supervisors shall be employed on occasions when a requirement is identified by the licence holders written risk assessment or requested by Sussex Police in writing with a minimum of 48 hours notice.
  - b) When it is appropriate for the premises to employ a mobile support unit (MSU) operated by ISA registered door staff. In the event that a MSU is contracted, the management will contract the back-up services of an approved MSU 24 hours a day, 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 Business Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.
  - c) What considerations have been made by the licence holder regarding any additional special events which may arise in the city during the year.
  - d) The use of glassware versus shatterproof or polycarbonate drinking vessels and the supply of glass bottles to customers.

Additional conditions as stated in original application or agreed with another Agency

**For Public Safety:**

Conditions as stated in original application or agreed with another Agency

**For the Prevention of Public Nuisance:**

Conditions as stated in original application or agreed with Environmental Protection

**For The Protection of Children from Harm:**

17. No unaccompanied children or young persons under 18 shall be permitted to enter or be on the premises at any time.
18. No children or young person under the age of 18 will be permitted to enter or remain on the premises at any time from 20:00 until close.
19.
  - (a) 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:

- \*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

- \*Vulnerability initiatives and how to respond to potential drink spiking

- (b) Further verbal reinforcement/refreshers 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/refreshers 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. These records will be retained for a minimum of twenty four (24) months.
20. 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.
21. Signage advertising the 'Challenge 25' policy will be displayed in prominent locations in the premises.
22. A list of staff members who are authorised to sell alcohol on the premises shall be kept. This shall be endorsed by the DPS with the date such authorisation commences.