

Appendix C

From: Brighton Licensing <Brighton.Licensing@sussex.police.uk>
Sent: 07 January 2026 14:07
To: Corinne Hardcastle <corinne.hardcastle@brighton-hove.gov.uk>
Cc: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>
Subject: Jurassic Beach Golf, Kingsway, Hove - Police Representation

CH CON END 14.01.2026 VALID PCD and PCH (A)

Dear Corinne Hardcastle,

Re: New premises licence application for Jurassic Beach Golf (Funplay Hove Ltd), Kingsway, Hove, BN3 2WW under the Licensing Act 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the above premises licence application on the grounds of the prevention of crime and disorder and protection of children from harm licensing objectives are not being promoted should this licence application be granted. We also refer to the Brighton & Hove City Council Statement of Licensing Policy.

This is a new licence application in an area of the city which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Special Stress Area (as defined in the Brighton & Hove City Council Statement of Licensing Policy) and seeks the following hours and licensable activities:

Supply of alcohol – on and off sales:

Monday through to Sunday: 09:00 – 21:00

Hours premises are open to the public:

Monday through to Sunday: 09:00 – 21:00

The general description of the premises is as children's rides and adventure golf course with a kiosk offering a range of food options such as burgers, chips, toasties etc. and drinks, currently soft and non-alcoholic as well as a selection of hot drink options. Conditions offered steer this application to a "Café" style operation. This information is taken from the application form as well as the venue's own website – www.jurassicbeachgolf.co.uk.

Sussex Police are unable to support this application over concerns around the licensing objective of the prevention of crime and disorder, mostly due to the off sales element and the protection of children from harm, regarding the suitability of this location having an alcohol licence and again, the off sales side of things.

The location of the venue is along Kingsway, Hove, next to the King Alfred Leisure Centre within the Special Stress Area as defined in the Brighton and Hove City Council Statement of Licensing Policy.

Referring to the matrix within the Statement of Licensing Policy which sets out the expectations for new and varied applications for the City:

Special Stress Area:

Cafe Yes (10.00pm) / Off-licence No

The applicant has made no reference to the local policy nor given any exceptional circumstances to go against it. They also don't acknowledge their beachfront location and the fact that this is very much a family focused attraction.

Family focused attraction:

When looking at the venue's website, this is very much a family attraction with Jurassic themed 18-hole mini golf, trampolines, buggies, and an arcade. The majority of this all being outside including the kiosk selling food and drinks.

Alcohol consumed within the footprint of these attractions could be detrimental to the locality and increase the associated risks. Due to the area attracting families with children, this could expose them to a more adult type of environment whose behaviour might not be suitable for that audience type. By adding alcohol, it could attract adult groups rather than more family orientated especially during the summer months.

The area this licence covers is large with most of it is outside. This would make it hard to ensure there is no proxy sales of alcohol to under 18-year-olds or to persons that are already intoxicated.

Off Sales:

When considering the off sales element of the application, there is limited control the licence holder will have once the drinks have left the premises. Within the application there is a condition put forward by the applicant which reads:

All alcohol sales whether on or off sales shall be in open plastic or shatter proof containers.

By the very wording of this condition, the off sales element is to attract sales to persons on the beach. There is then a risk of proxy sales to both under 18's and persons that could already be intoxicated. Mixing alcohol consumption with the sea is not something we can promote by way of letting this licence go through without a licensing panel making a final decision. We have seen persons lose their lives in Brighton & Hove as well as other parts of the country in coastal resorts due to misadventure, by way of being intoxicated and then getting into difficulty in the water.

Taking into consideration our comments above, and in support the local licensing policy, Sussex Police invite the Licensing Authority to seriously consider refusing this application in full.

Yours sincerely,
REDACTED
Insp, Ben Morrison

Enforcement & Licensing Inspector
Brighton & Hove Division
Sussex Police



Mark Thorogood
Police Licensing Officer
Level 4 PALO Qualification

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REP B

Corinne Hardcastle
Licensing Authority
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BN11JP

Date: 8 January 2026
Our Ref 2025/02993/LICREP/EH

e-mail: emily.fountain@brighton-hove.co.uk

CH CON END 14.01.2026 VALID PCD and PPN (B)

Dear Corinne Hardcastle

Licensing Act 2003

**Representation to the application for a New Premises Licence - 2025/09172/LAPREN
Jurassic Beach Golf - Kingsway, Hove**

I refer to the application made by Funplay Hove Ltd for a new Premises Licence to be granted for the above premises. The Licensing Team, in its role as Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the Prevention of Crime and Disorder and the Prevention of 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 every day from 09.00 to 21.00. The premises is described as kiosk selling food and both alcoholic and non alcoholic beverages at an adventure golf course with children's rides.

This representation is submitted as there are concerns that the application could have a negative impact on the licensing objectives of Prevention of Crime and Disorder and the Prevention of Public Nuisance this application falls within our Special Stress Area (SSA) and the 'off sales' element of this application is contrary to our Statement of Licensing policy (SoLP).

As mentioned above, this premises sits within the Special Stress Area, which, as stated in our SoLP on page 24 is deemed an area of special concern in terms of the levels of crime and disorder and public nuisance experienced within it. 3.3.3 of our SoLP states that new and variation applications for premises within the SSA operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas.

The Council's SoLP includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix

Model recognises the diverse operation and different risks presented by different classes of licensed premises. The SoLP 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. 3.4.4 of our SoLP states that each application is still considered on its own merits. However, Licensing Authority will apply the Matrix Approach in all cases unless there are exceptional circumstances which justify a different approach.

The decision-making Matrix on page 25 of the Council's Statement of Licensing Policy states 'No' to 'Off-Licences' in the Special Stress Area.

On looking at the application form, particularly section M (licensing objectives), I acknowledge that the applicant has proposed some positive conditions to support the licensing objectives.

However, I make this representation as a guardian of our Statement of Licensing Policy, the Matrix Model states no new off-licences should be granted in the SSA. I would therefore ask that the Panel determine the outcome of this application and whether the applicant has demonstrated exceptional circumstances to depart from our policy.

Yours sincerely
REDACTED
Emily Fountain
Licensing Officer
Licensing Team

