

## Appendix B

### SC Valid on PCD, PS and PCH (A)

**From:** Brighton Licensing <Brighton.Licensing@sussex.police.uk>

**Sent:** 17 March 2026 11:14

**To:** EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

**Cc:** EHL Environmental Protection <ehl.environmentalprotection@brighton-hove.gov.uk>; REDACTED

**Subject:** Temporary Event Notice for Riddle & Finns, 65 Kings Road, Brighton - Objection

**RE: TEMPORARY EVENT NOTICE (TEN) RIDDLE & FINNS, ROTUNDA, 65 KINGS ROAD, BRIGHTON, BN1 1NA - NOTICE OF OBJECTION under Section 104 (2) of the Licensing Act 2003**

To whom it may concern,

Notice of objection is hereby given on behalf of the Chief Officer of Police for Sussex for the following Temporary Event Notice (TENs) on the grounds of the licensing objectives not being promoted.

Riddle & Finns, Rotunda, 65 Kings Road, Brighton, BN1 1NA

Friday 3<sup>rd</sup> April – Monday 6<sup>th</sup> April 2026 12:00 – 20:00 each day.

Retail sale of alcohol for off sales only

Event Details: A Gazebo to serve some takeaway & drink for customers.

The location is on the Kings Road footpath level at the bottom end of West Street. Within the City Safety Area as defined in the Brighton & Hove City Council Statement of Licensing Policy 2026.

TENs are mentioned within the policy:

#### *5. Licensing Act 2003 provisions*

*5.1 Temporary Event Notices (TENs) The Licensing Authority will encourage bona fide community events. Applications for TENs at existing licensed premises will not be encouraged where the proposal is simply to extend the existing hours of operation and applications made in the city safety area will be subject to increased scrutiny by Police and Environmental Health. Licensing Guidance recognises that TENs are a light touch process, not requiring specific authorisation. If the police or Environmental Protection believe that allowing the premises to be used in accordance with the TEN will undermine the licensing objectives, they must issue an objection notice.*

From reading the events details, there is no “event” as such. This reads as being an additional revenue opportunity during the Easter period. It is to permit a gazebo to be placed outside on the west side of the premises (The Rotunda) to provide off sales of alcohol and a food offering.

The premises is currently licensed between the hours of 12:00 – 00:00 Monday to Saturday and 12:00 – 23:30 on a Sunday for the retail sale of alcohol on sales only. The outside seating area is included within the on sales permissions. Alcohol is provided as ancillary to a table meal only.

Sussex Police fully support the use of TENs for bona fide events and actively talk about their use to licenced venues should they need to move away from their current licence permissions to hold events such as private hires for celebrations or national events that are occurring. In 2025 we raised no objection to over 1,150 TENs across the city.

The concern we have is by permitting off sales of alcohol which, due to its location is highly likely to be consumed on the beach, the licensing objectives of the Prevent of crime & disorder, Public safety and Protection of children from harm are not being promoted.

When considering the off sales element, there is limited control the licence holder can have once the drinks have left the premises. There is a risk of proxy sales to both under 18’s and persons that could already be intoxicated. Mixing alcohol consumption with the sea is something we are unable to promote without the applicant evidencing how they will be able to promote the licensing objectives and ensure public safety once customers have left their controlled area. 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. Other consideration is the type of packaging being used when looking at the prevention of crime and disorder and the reliance on the persons to safely and correctly disposing of these items.

With the risks associated with off sales on to the beach, we feel an application such as this should be heard before a licensing panel, with the panel making a final decision on it.

The Chief Officer of Police contends that permitting this location to be used in accordance with the notice is likely to undermine the licensing objectives and so we ask that a Counter Notice is issued by the Licensing Authority Committee.

I confirm that a copy of this objection has been sent by email to the applicant and every other ‘relevant person’.

Yours sincerely,

REDACTED

Sgt. Mark Redbourn

Ops Planning and Events (inc. Licensing) Sergeant

Brighton & Hove Division

Sussex Police



**Mark Thorogood**

Police Licensing Officer

Level 4 PALO Qualification

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