

Appendix E

Email received from **REDACTED** 2014 hours on 01/08/2024

Dear Alex

It seems little time can pass without us corresponding.....

We have received the Objections from the Police on Tuesday (29th July) and, late yesterday, from Environmental Health, to our TEN application for Pride 2026.

For the sake of simplicity, I am setting out our position to these two Objections separately. This email focuses on the **Police** Objection. I will send a separate email within the next few minutes concerning our response to the B&HCC Environmental Health Objection.

There are substantial grounds which are applicable to both Objections. These are not identical, but very similar. This is particularly so in terms of the **legal validity** of **both** these Objections.

This email concerns the **Police's** Objection. The Police Objection is set out in the email below for everyone's convenience. We have also received, (30 July), a further email from EHL Licensing in which this Police Objection seems to have been processed by the Council as '*valid*' on all grounds. We emphatically disagree - hence this email to challenge legally that position.

Turning to the Police's Objection, I comment as follows:

Given the amount of resources allocated to the 2025 TEN, which was formally approved by B&HCC and the TEN issued to us only 4 days ago, (Mon 28th July 2025) we are very disappointed that the Police should have issued their Objection to our 2026 Application less than 24 hours later, (Tues 29th July 2025), in the manner they have, even though this 2026 TEN application is on identical terms (save as to dates) as the 2025 TEN granted the day before. (It is also on exactly the same terms as applied for in all previous Prides for the last 15 years and against which no Police Objections were raised and from which there have been no complaints from either agencies or our neighbours).

It is our very firm view that this latest Police Objection is **legally invalid**, as it is inconsistent with:

- (i) the legislation,
- (ii) the statutory Guidance, and
- (iii) our legitimate expectations.

Our position is explained below.

If the 2025 Police Objection was rejected by B&HCC, and the TEN issued as recently as this Monday afternoon, then our 2026 application cannot be objected to by the Police the very next day as this 2026 TEN application is asking for exactly the

same terms and there has been no change to the law or fact in the day between the 2025 TEN being granted and the Police objecting to the 2026 application.

We can, therefore, legitimately expect this Police Objection to be similarly dismissed by B&HCC and our 2026 TEN granted, per our application.

I set out our position below, in summary form:

Background

- Our 2025 TEN was granted this week, with us receiving formal notification from B&HCC at 4.09pm on Monday 28th July 2025.
- We then applied for the 2026 TEN within the next hour (at 4.44pm on Mon 28th July)
- The 2025 TEN, as applied for and issued, is on identical terms to the 2026 application (save as to dates).
- Under Public Administration law we have legitimate expectations that an application on exactly the same terms as the one accepted at 4.09pm on Monday afternoon should also be accepted when it was filed 35 minutes later. (Obviously this assumes that there is no change in law or facts in those 35 minutes - which is the case here. ie there have been no changes).
- There is also the basic principles of Equity and the need for consistency in applying the law.
- It was because we had spent so much time dealing with the TEN for 2025 (which began when we applied in March this year) that we decided to apply for the 2026 TEN whilst all of these matters had been agreed and so we could avoid the need for ourselves, the Council and the Police to repeat all of the points for 2026 which had just been agreed for 2025 - only minutes earlier. As it transpires, it seems that public (and private) resources do need to be spent re-addressing the identical points that were raised and resolved with the issuing of the 2025 TEN on Monday of this week.

Why are we applying for a TEN for Pride 2026, which is a year away?

Both the Police and EHL comment about our application for a TEN for an event a year in the future and comment that the plans for Pride 2026 (if it even happens) are not known.

We think it would be helpful to address this issue from the outset - both in legal terms and otherwise.

Avoiding duplication of public and private recourses

- For 2025 we have spent significant time and resources in engaging with the Police and Pride CIC concerning the changes for Pride 2025 and how this would impact upon our 2025 TEN application.
- These conversations began in March this year. The issue of our 2025 TEN was finally resolved on Monday this week (28 July) when our 2025 application was granted - on the terms as originally applied for.
- For our 2026 TEN, we were trying to avoid the need to re-invest substantial amounts of time etc, (both ours and the relevant other public bodies), in making a 2026 application when all of the points for 2025 have already been agreed. Hence our 2026 application this week. (See below for further details).

- From our conversations with Pride over the last few months, it is currently anticipated to have 2026 Pride on similar terms to 2025, and that if this goes ahead this will be on the weekend of 31st July to 2nd August 2026. Obviously, this is just an '*intention*' and there cannot be any commitment to do so at this stage. This is accepted.

No legal restrictions in the Licensing Act

- Legally, it is very clear that the legislation does not prevent TEN applications being made so far in advance.
- The wording of the Act is clear and it must apply. The wording of the Act simply cannot be over-ridden. There is no discretion to ignore the wording.
- The Licensing Act 2003 could have said '*TENs cannot be applied for more than 6 months in advance*' - but it doesn't.
- The timescales in the over-arching Licensing Act start from when Application is made, not from when the '*event*' is to take place.
- So there is no legal basis for rejecting a TEN simply because the event is a year in advance.
- It follows that, if there is no legal basis for rejecting a TEN simply because it is 12 months in advance, then there can be no valid Objection to it on that basis alone.
- Any Objections therefore need to be consistent with the Licensing Act, statutory Guidance and established case law. ie they need to be evidence-based and the applications need to be treated in a consistent way.

'Permits', not 'compels'

- Having said that, our 2026 TEN application assumes that:
 - (i) there will be a 2026 Pride,
 - (ii) it will be for the stated weekend and
 - (iii) it will be on substantially the same basis as 2025.
- This 2026 TEN is just to give us the permission to operate on these terms if we feel it is appropriate to do so. It permits us to operate on this basis; it does not compel us to do so. If we choose to operate the TEN then, of course, the Licensing Objectives will continue to apply in everything we do and how we do it.

Proportionality - Responsible operators who will take dynamic decisions

- As set out below, we are responsible, professional and experienced operators, who will make dynamic adjustments in the light of circumstances as presented at the time.
- This is covered in detail in the legal context of '*proportionality*'.

Licensing Objectives will always apply

- We are very conscious that what amounts to a Public Nuisance depends upon the context - and we are obliged to uphold all the Licensing Objective at all times - ie a TEN does not '*over-rule*' the wider Licensing Objective and certainly does not give us *carte blanche* to do as we wish. That is very clear and understood.

- This is particularly relevant to the discussion of Public Nuisance - which is relevant to both Police and EHL Objections.
- The relevance here is that if the 2026 Pride has a different structure (or maybe doesn't even happen) then we will be flexible in our operations and make adjustments to our operation as appropriate - as we would always do (and always have done)- in order to uphold the Licensing Objectives.
- This is what we have done for the last 15 years across all our four venues across town.

Each TEN must be considered on its own merits

- Last week we made the point that under the Licensing Act 2003 and statutory Guidance it is paramount that each TEN application **must** be treated on its own merits.
- Issues as to '*wider events across the city*' simply **cannot** be taken into account in the decision making for a TEN.
- You commented "*We acknowledge the points regarding the use of TENS in the context of wider eventsand we'll continue working closely with Sussex Police and other partners to ensure that Licensing decisions are fair, proportionate, and in line with statutory guidance*"... and you concluded "*we consider it is not proportionate to proceed with a hearing*".
- Of course, we agreed with your view and we can reasonably and legitimately expect there not to be a Hearing over the 2026 TEN on the same grounds.
- We are struggling to understand and reconcile the paragraph in the Police's 2026 objection where they say "*We are fully aware that all TENS need to be considered on their own merit' yet their very next sentence says "With this in mind we need to be able to consider what impact a possibly citywide event could have on policing of the city as a whole, and how this could impact The Camelford Arm's own wish to hold an event themselves under a TEN"*".
- These two comments are completely contradictory and inconsistent.
- The Licensing Act 2003 and the statutory Guidance both make it very clear that wider events (if any) across the city **cannot** be taken into account for the granting of TENS.
- This is the point you "*acknowledged*" last week (above).
- The legislation on TENS is very clear. TENS are meant to be '*light-touch processes*' which need to focus on the TEN as applied for and, legally, **cannot** be used to exert control over other city-wide events.
- There is no shortage of powers by which the Police and B&HCC Environmental Health can control and influence activities across the wider city for any events that are planned, but Part 5 of the Licensing Act 2003 is not one of these powers.
- To seek to do this, in this way, is to usurp the limited powers granted to the Police by Parliament regarding TENS.

The Police's Objection

Looking at the Police's actual objection, I would like to make the following points:

All of what follows needs to be read in the context that our 2026 TEN is with **identical** wording to the 2025 TEN as formally approved this week (and every other TEN that

we have submitted over the previous 10+ Prides and for which no Objection has ever been raised, by the Police or Environmental Health.

The Police:

- Are objecting on every single one of the four Licensing Objectives - even though it is perfectly clear that there cannot be an issue in one case (*Protecting children from harm*) and there have never been any issues in all three other cases.
- Have not identified any term of our application which will cause the undermining of any or all of these Licensing Objectives.
- Have provided no evidence to support their Objection - which they are legally required to do.

This TEN application simply cannot undermine all four Licensing Objectives

- The Police base their Objection to the 2026 TEN on the basis that it risks undermining all four of the Licensing Objectives.
- By contrast, the Police's Objection to our 2025 TEN, submitted by the Police on 14th July, was only based on *Public Safety* and *Crime & Disorder*. Nothing has happened in the intervening fortnight to justify this extension of the grounds for their Objection to cover the two additional Licensing Objectives when the 2026 TEN application is on exactly the same terms.
- We find the additions of *Protection of Children from Harm* and *Public Nuisance* to be unsupportable and is legally inconsistent with the Licensing Act.

Protection of children from harm

- We simply cannot accept how '*Protection of children from harm*' can possibly be an issue - for the glaringly obvious reason that our regular Premises Licence does not permit any children to be admitted into the pub at any time - not even to enjoy one of our award-winning Sunday Lunches with their families. (Our TEN makes no application to have this age-restriction removed).
- The Police are on record in both their 2025 and 2026 Objections that "extra scrutiny is taken when reviewing TENs during this particular weekend" - so, if this is the case, how can this unapplicable Licensing Objective have been added as an objection for 2026?
- We note that the Police Objection was made within 3 working hours of us submitting our 2026 application and without any attempt to reach out to us to discuss their Objection.
- *Protection of children from harm* has never been raised with us by anyone in the 15 years we have owned and operated The Camelford Arms.
- To do so now is disproportionate, evidentially unsubstantiated (see below) and irrelevant.
- This ground for Objection must be inapplicable as it relates to a venue where children are prevented by, our Premises Licence, from ever entering.
- So there is no legal basis for this heading of Objection.

Prevention of Public Nuisance

- Similarly, *Prevention of Public Nuisance* has **never** been raised with us by the Police or Environmental Health in the last 15 years.
- This is normally within the role of Environmental Health, rather than the Police.
- EHL raised **no Objection** to the 2025 TEN approved this week or the 2026 application submitted this week, (or any previous TEN application since 2010).
- This was also not raised by the Police as an issue in their Objection of 14th July 2026 to our 2025 TEN. The facts have not changed in the intervening fortnight. It is therefore inconsistent with their position over the last 15 years for them to now introduce this as a ground for Objection.
- No evidence has been supplied to support their new position over Public Nuisance.
- So there is no legal basis for this heading of Objection being added now.

No objections to the 2025 TEN, even though there is a statutory duty on the Police to object

- Neither of the above Licensing Objectives were raised in connection with our 2025 application.
- However, the law is very clear; If the Police feel that any aspects of any TEN risks undermining the Licensing Objectives then they **must** raise an Objection to it.
- This is not a **discretionary power**, this is a **statutory duty** to object.
- The fact that the Police did not object in March 2025 to our 2025 TEN (which was on exactly the same terms as our 2026 TEN, and where there was no change in law or factual circumstance), does undermine the credibility of this 2026 Objection.
- If it is a problem in 2026 then it must also have been a problem in 2025. But no objection was raised in 2025. So how is it a problem in 2026?

The other Licensing Objectives which the Police raised were:

Public Safety

- For the purpose of the Licensing Act / TENs, it is very well-established law that this category is legally restricted to issues about whether our **venue** is safe for the public to use eg over-crowding issues etc.
- It **cannot** lawfully be used in the context of wider issues elsewhere across town.
- TENs can **only** relate to our specific **premises** and each application needs to be treated **on its own merits**.
- No evidence has been provided by the Police to show that we would be undermining this Licensing Objective in this regard.
- So there is no legal basis for this heading of Objection.

Prevention of Crime and Disorder

- We discussed this aspect at length with Sgt Mark Redbourn and the Police Licensing Officer (Mark Thorogood) in our Teams meeting with them less than three weeks ago (11th July) regarding our 2025 TEN.

- We do not regard the banning of Off-sales, which was the Police's **only** objection to the 2025 TEN, as likely to undermine this Licensing Objective and point to the evidence that there has **never** been an issue of Crime & Disorder at The Camelford Arms in the last 15 years - whether during Pride or otherwise. (Off-sales are included in our '*regular*' Premises Licence).
- The Police provided no evidence that this Licensing Objective would be undermined - for either their 2025 TEN or 2026 TEN Objections.
- Our earlier key point that a TEN cannot be used to control wider city-wide events applies here.
- Our evidence is that our clientele is an older crowd who are well-behaved and who have come to us at Pride (for the last 15 years) to enjoy socialising outside our venue and being in a position to chat away in a pleasant and responsible way.
- I note that the draft Statement of Licensing Policy discussed at the Council meeting last week states it is looking to encourage a more mixed-age profile in the night-time economy.
- Preventing older residents (and tourists) from enjoying socialising and being outside our premises with people in their own age group, where they have done so for the last 15 years (without trouble or complaint) is not going to help achieve this laudable goal.
- I repeat, the Police have provided no evidence that this Licensing Objective will be undermined.
- So there is no legal basis for this heading of Objection.

Objections must be based on evidence

- The TEN case law is clear; any objections must be based on evidence and not speculation or conjecture. (Thwaites).
- **No evidence** has been provided in the Police's 2026 Objections to support the risk of **any** of these four Licensing Objectives being undermined.
- The Police's Objections to our 2026 application is based on speculation as to what **might** happen in two Prides' time; by contrast our position is based on what has **actually happened** in each of the last 15 years.
- On this basis alone, the Police Objection is invalid and should be rejected.

Which terms of the TEN are being objected to?

- The above points relate to the Licensing Objectives as **grounds** for objection, but the Police's Objection does not even state to **which part** of our TEN application they are objecting.
- The Police Objection merely summarises, correctly, what we have been asking for.
- It makes **no comment at all** about which of our requests will give rise to undermining any of the specific Licensing Objectives.
- We have very strong grounds for applying to:
 - Extend our operating hours (never objected to in the past and never been a problem).
 - Use our rear garden area as a breakout area (never objected to in the past and never been a problem).
 - Relax the door conditions (never objected to in the past and never been a problem).

- Have security staff (never objected to in the past and never been a problem), and
- Have Off-sales (never objected to in the past and never been a problem, until 2025 but where our TEN was granted, allowing such Off-sales as were applied for). To repeat, Off-sales are included in our regular Premises Licence.

Legally, the Police's Objection needs to state;

- (i) which of these TEN requests do the Police object to, and
- (ii) demonstrate which Licensing Objective will be undermined by them.

They have not done so. Their stance seems to be, **without providing any evidence** (or, indeed, any argument) that **all four** of the Licensing Objectives are undermined by **all five** of the areas where we are looking to have altered in our TEN.

It is a legally improper for the Police to issue such a blanket Objection. To do so is to drive a horse and cart through the Licensing Act.

Therefore, this cannot be a lawfully valid Objection, within the structure of the Licensing Act.

There is no 'major change to the operation of Pride in 2025' which will impact upon our TEN application for 2026

There is commentary in the Police's Objection about the '*large scale changes that will apply to Pride 2025 for the first time*'.

BUT:

- These changes only apply to the size of the 2025 footprint of the Pride Street Party / Pride Village Party during the hours of the '*official*' Street Party.
- This official party finishes at 11pm on the Saturday and 9pm on the Sunday (in 2025).
- The official party does not apply at all to the Friday evening, which is also covered by our TEN and to which the Police are objecting. Again, we intend to run our Friday night in 2026 in exactly the same way as for the last 15 years and which has **never** caused a problem and, in any event, is outside the Street Party times.
- Our 2026 application is primarily related to the extension of our operating hours from 1am on the Sat night / Sun Morning and to 1am on the Sunday night / Mon morning.
- At these times there are absolutely **no changes** at all in the structure of the Street Party as, at that stage of the evening, the changes for 2025 will have ceased to have any impact over 2 hours previously as the '*official*' Street Party will have finished.
- We will be looking to run our event in the same way as for all other years with the extended hours being at a stage in the evening when there is **unrestricted access** to Camelford St (because the ticket-access aspect has finished) - as has been the case in every Pride for the last 15 years - without incident or complaint.

Next year?

- The Police cannot lawfully object to our Pride 2026 on the basis of plans that haven't been announced yet.
- For all we know, there might not even be a Pride next year.
- If it is the case that there is to be no Pride 2026 then we will act dynamically to the changed circumstances (see below re '*proportionality*').

Proportionality

- As you commented last week in approving our 2025 TEN, there is the legal requirement to act in a way which is proportionate at all times.
- Making a blanket objection on the grounds of **all four** Licensing Objectives and, one presumes, (because it is not otherwise explained), to **all five** relaxations that we have asked for is clearly **dis**proportionate and therefore an **in**valid Objection.
- There is a further point that we would like to make on '*proportionality*'; namely that what is '*proportionate*' depends upon the availability of alternative actions and interventions. Refusing our TEN is only '*proportionate*' if there are no adequate available alternative means of addressing the concerns.
- The TEN would **permit** us to operate in this way, it would not **compel** us to do so. It just because we may have been granted extended hours this does not mean we are required to be open until this time.
- If the concern is that there **might** be trouble due to the various **unknowns**, then we, as professional and experienced operators, would obviously intervene to address any actual problem. We would make dynamic adjustments, in '*real time*' and do what would be required in order to uphold the Licensing Objectives. ie as an alternative to not issuing the TEN, we, as long-standing operators, could be entrusted to exercise a mature judgement in the light of the actual events unfolding before us at the time, rather than being completely prohibited from doing so by accepting the Police Objection to the TEN.
- **REDACTED** We have worked hard, since 2010, to foster good relations with our neighbours. There is absolutely no reason at all why we would wish to place all that in jeopardy. We are responsible people.
- We have been investing in Brighton businesses for 15 years.
- We have been residents in the Kemptown area for 30 years.
- We are not *fly-by-night* operators.
- Our director and myself have **personally** attended The Camelford Arms **every** Friday, Saturday and Sunday night (**until closing**) of **every** Pride since 2010.
- We are very experienced at managing this venue, and others, on Pride weekends and if we need to take dynamic actions to uphold the Licensing Objectives, then we will do so.
- On a similar vein, I see from the draft new Statement of Licensing Policy currently under consideration by the Council (and which may well be in force by the time of Pride 2026) that there will be support given to the '*Good Operators*' in a way which is consistent with their track record in the city.
- On this basis, we satisfy **all** the draft criteria for being a '*Good Operator*'.
- We have committed **REDACTED** into developing the very important hospitality sector in our city and our local economy, creating new jobs as we did so.
- Our history, over 15 years, is of us investing in four venues across town where we have taken-over troubled venues and turned these around. This includes a

previous night club on West Street which had a terrible reputation and which we transformed.

- The Camelford Arms is another such venue. It lost its Licence in 2008 and we took it over in 2010. So bad was its reputation with our neighbours that we needed to re-brand the place.
- We changed the pub's name (ex White Horse) and are very proud to have transformed the former pub into a Community Pub which fully supports every one of the Licensing Objectives.
- Our pub is now an award-winning, food-led venue which has been awarded the TripAdvisor Certificate of Excellence for each of the last 10 consecutive years.
- I would also like to add that, until earlier this year when the new Chair of Licensing invited us to participate in a discussion on the Statement of Licensing Policy, we have ***never*** had any discussion with the Police or the Council along the lines of '*You have done a fine job in improving our community, how can we support you further and what support could the regulatory authorities do to help you*'.
- We have ***never*** been any trouble with the Council or the Police.
- If we aren't a 'Good Operator', then who is?
- We can therefore be reasonably relied upon to take the 'alternative' actions and interventions if the need to do so arose.

Summary

To summarise our ***legal*** case:

- The clear wording of the Licensing Act must apply to all decisions and Objections.
- There is no restriction in the Licensing Act to impose any maximum time in advance of an event that a TEN can be submitted.
- It is therefore ***legally irrelevant*** that the event for the 2026 TEN application is a year away.
- Every TEN needs to be assessed on its individual merits.
- TENs cannot be used to control wider events across the city.
- The Police have clearly not assessed our application on its individual merits, taking into account the characteristics of the venue as is required by the statutory Guidance.
- They have issued a blanket objection, (not permitted under the Licensing Act), invoking ***all four*** Licensing Objectives to ***all five*** of the relaxations we requested in our application - even when this is patently inapplicable (eg Protection of children from harm, in a venue that is not even allowed to have children on the premises at any time).
- The Police Objection has not been explained, or discussed with us.
- The Police Objection has not been supported with any evidence - which is a ***legal requirement***.
- There has never been any prior Objection by the Police or Environmental Health to any of the Pride TENs we have applied for over the last 15 years - until our 2025 application which has been granted as recently as this week and for the Police Objection was over-ruled.

- There has never been any actual instance over the last 15 years where there has been any evidence or complaint by the Police or Environmental Health that anything we have done has undermined any of the Licensing Objectives.
- There is no material change of circumstances with any previous Pride, insofar as it relates to our 2026 application - as any changes to Pride Village / Street Party will not apply to the hours under discussion as the Street Party will have finished by then.
- We are legitimately entitled to expect that if we are granted a TEN at 4.09pm one day, that an identical application, made 35 minutes later, will also be granted - in the absence of any material change of circumstances.
- All actions must be proportionate - and denying a TEN on the same terms as those issued throughout the last 15 years - where there has been no previous objection and no complaint - on the basis of what '*might*' happen in two Prides time, is not '*proportionate*'.
- Therefore this Police Objection **cannot** be valid within the terms, structure and spirit of the Licensing Act, statutory Guidance and associated case law.
- The approach adopted is not consistent with the light-touch approach of the Licensing Act as specifically emphasised in the statutory Guidance.
- The 2026 Police Objection must therefore be rejected our 2026 TEN application must be granted.

With best wishes

Tony Groom

Head of Legal

Rowbell Group of Companies

From: REDACTED

Sent: 21 April 2026 18:07

To: REDACTED

Cc: REDACTED

Subject: Re: Camelford Arms TEN Application 2025/02027 for 31st July 2026 to 2nd August 2026 (5653832)

Dear **REDACTED**,

Thank you for your email regarding the scheduling of the Temporary Event Notice (TEN) Hearing.

I acknowledge that, notwithstanding the expiry of the four--month "*specified period*" under Regulation 11 on 1 December, the Licensing Authority is still required under section 105 of the Licensing Act 2003 to hold a Hearing where an Objection has been made. I therefore accept that a Hearing may need to proceed, (subject to point 8 below, '*Procedural Inconsistency*').

However, I must place on record a number of **serious procedural concerns**, particularly relating to the **delay**, the **lack of communication**, and the **significant prejudice** this has caused to us.

1. Expiry of the Regulation 11 Extension Period and Resulting Prejudice

The Authority extended the Hearing period for four months under Regulation 11. This period expired on **1 December 2025** without a Hearing being held.

We did not agree to any extension of this period of postponement.

While I accept that the Authority retains responsibility for the process, the failure to comply with the statutory timetable has caused us **very significant prejudice**.

The TEN regime is designed to operate a *'light touch'* process within **strict, short deadlines**. The Police ordinarily have **two working days** to object and, in practice, around **two weeks** to prepare for a Hearing. The statutory framework does not envisage — and does not permit — a nine--month period for the Police to develop or alter their case - as they have done.

By delaying the Hearing for over nine months:

1. the Police have been given a **substantial and unintended advantage**,
2. they have had the opportunity to raise **new matters** that were not of concern at the time of their Objection (or in any of the 16 previous years, at least, eg. 'Proxy Sales'),
3. they have been able to **shift and expand their grounds**,
4. and they have done so **without providing any evidence**.

This is the very definition of **moving the goalposts**, and it is **inherently unfair**.

This point **cannot be under-played**.

We understand that the **only** issue the Police are now raising is that of Proxy Sales. The first time this was **ever** raised with us was when you notified us of this on 9th April 2026, **over 8 months after** the standard deadline to raise an Objection had expired. This was not referred to in their Objection of last July. To introduce a **completely new ground**, which has **never been raised as an issue in the 16 years** we have been operating The Camelford Arms, has only been possible because of this extension of the Hearing period and the failure to adhere to this Reg 11 extension.

This is contrary to the rules of procedural fairness, natural justice and has **unquestionably materially prejudiced our position**.

2. Purpose of the Extension Has Long Since Been Achieved

The rationale for the Regulation 11 extension was to allow the Police to conduct a **review of last year's event**. We understand (from **REDACTED** of Pride CIC) that this Review took place in **September 2025**, well within the extended period.

There was therefore **no reason** why the Hearing could not have been held within the four--month extension.

The Licensing Authority has not provided any explanation for:

1. why the extended period was allowed to lapse,
2. why no Hearing was arranged within that period, or
3. why no steps were taken to progress the matter.

This lack of action has materially contributed to the prejudice now faced by us.

3. Lack of Communication and Lack of Pressure on the Police

We have repeatedly chased the Licensing Authority for updates, waiting **over two months** for any response. **REDACTED** email of 5th March confirms that the Authority only began raising the matter with the Police again in **March 2026**, more than three months after the expiry of the extended period. Per **REDACTED** email:

1. ***"Now that Pride 2025 has taken place [7 months previously] and the relevant debriefs have been concluded, [Sept 2025] I agree it is appropriate to revisit the outstanding objections to the Pride 2026 Temporary Event Notice"*** and
2. ***"I am therefore re engaging with Sussex Police and Environmental Protection, sharing your representations, [made to the Licensing Authority 7 months earlier in Aug 2025] and asking them to confirm whether they wish to maintain their objections to the TEN as currently submitted"***

It appears that:

1. no pressure was placed on the Police to progress their Objection,
2. no deadlines were enforced, and
3. no steps were taken to ensure that the extended period was used for its intended purpose.

Meanwhile, the Police have **not communicated with us directly for nine months** (since their original Objection), and have provided **no evidence** to support their Objection. We are only aware of this latest position of the Police from your comments in your 9th April 2026 email. We have heard nothing at all from the Police directly.

This prolonged inactivity has caused clear and avoidable prejudice.

4. Environmental Health Withdrawal

Environmental Health originally objected on three Licensing Objectives. You have told us that they have now **withdrawn all their Objections**. (We have had no direct communication from Environmental Health, other than their formal Objection 8 months ago).

Given that Environmental Health are the statutory experts on Public Safety, Public Nuisance and the Protection of Children From Harm, their withdrawal must significantly undermine the credibility and weight of the Police's remaining Objection.

5. Police Objection – Lack of Specificity and Lack of Evidence

The Police's original Objection was a **blanket objection** citing all four Licensing Objectives, without providing any specific reasons or evidence. The Police even objected on the grounds of Protection of Children From Harm even though, for at least the last 20 years, our Licence has precluded children from being admitted to our pub - not even for Sunday lunch with their families.

We have now been informed, indirectly via yourself in your 9th April email, that the Police are objecting solely on the basis of "**Proxy Sales**". However:

1. Proxy Sales were **not mentioned** in their original Objection,
2. Proxy Sales have **never been raised** in the last 16 years,
3. Proxy Sales were **not raised** during last year's joint visit by six regulatory officers with whom I personally engaged late on the Saturday evening,
4. The Camelford Arms is restricted to 18+ customers at all times as a term of its Licence,
5. The Police have provided **no evidence** to support this new concern,
6. This concern is not mentioned in their Objection in July 2025,
7. It has never been raised as a concern in any previous TEN application over the last 16 Prides, and

8. Had it been a concern in any of those previous years the Police would have been duty-bound to raise an Objection. They did not do so.

Even within this Objection the **Police are inconsistent:**

1. The Police are not raising any concerns about *all* Proxy Sales.
2. Their concern is restricted to proxy Sales
 1. from off-sales (only) and
 2. during the period of the extended hours from 1am to 3am on Friday morning, 1am to 4am on Sunday morning and 23.30 Sunday to 1.00am Monday (only) - but not at any other stage of the weekend during normal licensed trading hours.
3. Given that we will be operating on precisely the same terms during the extended hours (including provision of Door Security) as we will be during the non-extended hours then there will be no difference at all.
4. This inconsistency **seriously undermines the credibility** of this, the Police's **only**, concern.

Proxy Sales have never been raised at any Pride meeting (planning or feedback) that we have attended at any time over the last 16 years. It has certainly **never** been raised in connection with The Camelford Arms at any time of the year in the last 16 years. To do so now needs supporting evidence and none has been provided. We also do not know precisely **which Licensing Objective** the Police now rely upon. Is it *'Prevention of Crime & Disorder?* Is it *'Protection of Children From Harm?* The Police can only raise an Objection where this is based on one of the Licensing Objectives, but this needs to be specified and it hasn't been. This lack of clarity is procedurally unfair, as we do not know the case we are expected to answer. It is not for us to second-guess the Police's grounds for Objection; it is for the Police to state this to us. Again, the lack of direct communication with us from the Police is prejudicing our preparation for any Hearing.

6. Good Operator Policy – Statement of Licensing Policy 2026 (para 3.5)

The Licensing Authority's own recently adopted Statement of Licensing Policy includes a **Good Operator Policy** at paragraph 3.5, which creates a **presumption in favour of granting applications** made by operators with a long, responsible, incident-free history **unless** there is **clear and compelling evidence** to the contrary.

We clearly fall within this definition:

1. 16 years of incident-free operation across multiple venues across Brighton & Hove
2. successful turnaround of several problem venues across Brighton & Hove (including a night-club on West Street),
3. no formal interventions,
4. direct, hands-on management,
5. positive engagement with responsible authorities.

Furthermore, both myself and the director of Rowbell Leisure have **personally attended every hour of every Friday night, Saturday night and Sunday night of Pride for every one of the last 16 years**. We have operated a very hands-on approach over this weekend each Pride. Over this 16-year period there is **absolutely no-one** who has more experience of this venue over this weekend. By contrast, the police have provided **no evidence**, let alone the **"clear and compelling evidence" required** by the 2026 Statement of Licensing Policy), to

rebut this presumption of granting applications from Good Operators such as ourselves.

7. Proportionality and Use of Public Resources

Given:

1. the expiry of the Regulation 11 period,
2. the lack of action during the extended period,
3. the lack of communication,
4. the absence of evidence from the Police,
5. the withdrawal of Environmental Health's Objection,
6. the Good Operator presumption, and
7. our 16--year incident--free history.

it is difficult to see how proceeding to a contested Hearing on the basis of a single, unevicenced Police concern (which was not raised 9 months ago when they issued their Objection) could be considered a proportionate use of public funds.

Nonetheless, if the Authority determines that a Hearing must proceed, we will of course attend. However, we reserve our position fully and will appeal to the Magistrates Court should a counter--notice be issued.

8 . Procedural Inconsistency

You comment that you have no power to declare a Police Objection to be invalid. However, you will recall that last year the Licensing Authority declared, (Alex Evans) on 24th July 2026 that "*Following further **internal discussions** and **legal advice**, we've decided not to pursue a hearing in this instance and will allow the TEN to proceed as applied*" [My emphasis].

As far as we are aware, the 2025 Police Objection was not withdrawn on that occasion yet the Licensing Authority, following *internal* discussion (so not involving the Police) and on *legal advice* took a decision NOT to call a Hearing.

We are entitled to expect consistent treatment.

Our 2026 TEN was submitted within an hour of receiving this response granting our 2025 application.

9. Request for Confirmation

In the absence of any direct communication with us from the Police since we received their Objection in July last year, we are only able to rely on the information passed to us by you in your 9th April email. On grounds of procedural fairness, we need to know whether there are any other concerns the Police have.

Therefore, before any Hearing takes place, we respectfully request:

1. **Confirmation of the precise Licensing Objective** under which the Police now object.
2. **Disclosure of any evidence** the Police intend to rely upon.
3. **Confirmation that the Police have no other Objections other than Proxy Sales** (in such limited circumstances as outlined above).

This information is essential to ensure fairness and to allow us to prepare properly.

10. Legitimate Expectations of Consistency

1. Our 2026 TEN application is identical to our 2025 TEN (save as to dates).
2. The 2026 Application was submitted within an hour of the 2025 Application being granted.
3. Our 2026 Application is on substantially the same terms as all previous TEN applications over the last 16 years.

In the absence of any difference, we are legitimately entitled to expect a consistent treatment.

11. Collecting Evidence of Proxy Sales

Immediately upon receipt of your 9th April 2026 email informing us that the Police's sole remaining Objection related to Proxy Sales, I submitted a Freedom of Information Act Request to Sussex Police requiring details of how many people were cautioned, charged, arrested and/or prosecuted for Proxy Sales (s149 Licensing Act) in the St James St area over the last 4 Pride weekends.

The purpose of doing so was to be able to provide factual details of the prevalence of this issue to any Hearing and so **enable an evidenced-based consideration by the Panel.**

There is a 20 working-day deadline for the Police to respond to this request, which will expire on Friday 8th May 2026.

So, in order for the Committee to be fully informed, it would not be possible to hold a Hearing before this date. The Police, of course, already have this information, albeit this has not been shared with us, or, presumably, the Licensing Authority.

12. Available dates

We will also not be available on Wed 13th (pm), Thurs 14th (pm), Fri 15th May, Wed 20th May, Thurs 21st May, Fri 22nd May, Wed 27 May (pm), Thurs 28th May or Fri 29th May.

Thank you for your attention to these matters. I look forward to hearing from you.
Kind regards and best wishes,

REDACTED
Rowbell Leisure Limited

From: REDACTED
Sent: 24 April 2026 12:20
To: REDACTED
Cc: REDACTED
Subject: Re: Camelford Arms TEN Application 2025/02027 for 31st July 2026 to 2nd August 2026 (5653832)

Good Morning **REDACTED**,

Following on from my email below, I have now received, this morning, the response from Sussex Police to my FOI Request concerning Proxy Sales in the Pride Village Party area for the last 4 years.

As you will see, the Police have confirmed that they do keep records of such Proxy Sales. This enabled them to have a fully informed insight into the prevalence of Proxy Sales during the last four Pride Village Parties around which to base their Objection.

However, Sussex Police have confirmed that over the last four Prides the number of people cautioned, arrested, charged or convicted in the Pride Village Party area for Proxy Sales is zero.

So, given:

1. This is the only outstanding ground for objecting to our TEN by the Police,
2. The Police have not supplied any evidence to support their concerns to the Licensing Authority,
3. The Police have never raised this as a concern in the 16 years we have been operating The Camelford Arms including (but not limited to) all Prides since 2010,
4. The Police have confirmed that there have been no cautions, arrests, charges or convictions in the Pride Village area in any of the last 4 years,
5. It is a requirement that any Objection needs to be evidenced by the Police.
6. There is **no Police evidence submitted which supports** this Objection.
7. The **only Police evidence available shows that Proxy Sales has not been an issue.**

then we do feel that the Licensing Authority is duty-bound to ask that the Police withdraw their Objection as it would be disproportionate to proceed to a Hearing and this would be an unnecessary expense to the public (and private) purse to do so.

Kind regards

REDACTED
Rowbell Leisure Limited

Sussex Police FOI – Response – 24.4.26

INFORMATION ACCESS

Headquarters
Church Lane
Lewes
East Sussex
BN7 2DZ

Tel: 01273 470101
www.sussex.police.uk

FOI Reference Number: 2383/26
Date: 24/04/2026

Dear Applicant,

I write with reference to your request for information under the Freedom of Information Act 2000.

Request:

Under the Freedom of Information Act can you please tell me, (separately under each category), how many people were:

- a) Cautioned,*
- b) Charged,*
- c) Arrested and/ or*
- d) Convicted*

of 'Proxy Sales of alcohol' contrary to s149 Licensing Act 2003 from licensed premises, over the period from 6pm on Friday 1st August 2025 until 1am Monday 4th August 2025 in the area of the Pride Village Street Party and immediate areas within approx 150 yards of St James St in Kemptown, Brighton.

For these purposes, I am only seeking information of off-sales (and not on-sales) of alcohol (and no other age-restricted products) from public houses (and no other outlet, eg supermarkets or off-licences) to someone of the age of 18 or over on behalf of someone under the age of 18.

Please also provide similar information for:

- Pride Weekend 2024 (6pm Fri 2nd Aug 2024 to 1am Mon 5th Aug 2024)*
- Pride Weekend 2023 (6pm Fri 4th Aug 2023 to 1am Mon 7th Aug 2023) and*
- Pride Weekend 2022 (6pm Fri 5th Aug 2022 to 1am Mon 8th Aug 2022)*

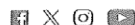
Response:

Section 1 of the Freedom of information Act 2000 (FOIA) places two duties on public authorities. Unless exemptions apply, the first duty at s1(1)(a) is to confirm or deny whether the information specified within a request is held. The second duty at s1(1)(b) is to disclose information that has been confirmed as being held. Where exemptions are relied upon Section 17 of the FOIA requires that we provide the applicant with a notice which: a) states that fact, b) specifies the exemption(s) in question and c) state (if that would not otherwise be apparent) why the exemption applies.

I can confirm that the information you requested is held by Sussex Police, under Section 1(1)(a) of the Act.

A search of arrests from our custody system was completed, as these offences are non-recordable crimes, for the HO offence codes and descriptions as shown below, relating to the periods requested, and advise you that no records were returned.

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Arrest HO Stats Code	Reason for Arrest Description
143/82	Person Under 16 Purchased / Attempted To Purchase Alcohol - Pilot Forces Only
143/82	Person Under 18 Attempt To Be Supplied With Alcohol To His Order By / On Behalf Of Club - Licensing
143/82	Person Under 18 Attempt To Purchase Alcohol - Licensing
143/82	Person Under 18 Purchased / Attempted To Purchase Alcohol - Licensing
143/82	Person Under 18 Supplied With Alcohol To His Order By / On Behalf Of Club - Licensing
143/83	Attempt Supply Alcohol By Act / Default To / To Order Of Club Member For Consumption By Under 18 - Licensing
143/83	Attempt To Buy Alcohol For Consumption By Person Under 18 Years On Relevant Premises - Licensing
143/83	Attempt To Buy Alcohol On Behalf Of A Person Under 18 - Licensing
143/83	Club Member Attempt To Make Arrangement Whereby Alcohol Supplied To A Person Aged Under 18 Years - Licensing
143/83	Club Member Make Arrangement Whereby Alcohol Supplied To A Person Under 18 - Licensing
143/83	Person Under 16 Purchased / Attempt To Purchase Alcohol On Behalf Of Person Under 18 - Pilot Forces Only
143/83	Purchased / Attempted To Purchase Alcohol For Consumption By Under 18 On Relevant Premises - Licensing
143/83	Purchased / Attempt To Purchase Alcohol On Behalf Of Person Under 18 - Licensing
143/83	Supply Alcohol By Act / Default To / To Order Of Club Member For Consumption By Person Under 18 - Licensing
143/83	Under 16 Purchase / Attempt To Purchase Alcohol For Consumption By Under 18 On Relevant Premises - Pilot Forces Only

I can therefore confirm the answer to this request is zero.

Should you have any questions about this response, please do not hesitate to contact the FOI team.

Yours sincerely,

Data Protection Unit
 Pevensey Block
 Sussex Police HQ
 Lewes
 BN7 2DZ

Reply email FOI@sussex.police.uk



From: Sarah Cornell REDACTED

Sent: Thursday, April 09, 2026 13:37

To: Tony Groom REDACTED

Subject: RE: Camelford Arms TEN Application 2025/02027 for 31st July 2026 to 2nd August 2026

Dear Tony,

Thank you for your email.

Since 1 August 2025, as you are aware, there has been regular email correspondence between Alex Evans and yourselves regarding this Temporary Event Notice (TEN). On 5 March 2026, Alex Evans wrote to you confirming that he was re-engaging with Sussex

Police and Environmental Protection to establish their position. It is clear therefore that the time in which to hold a hearing remains extended, and the requirement to hold a hearing if an objection notice is not withdrawn is set out in section 105 of the Licensing Act 2003.

We write now to update you following recent correspondence with the Responsible Authorities. Environmental Protection have now formally withdrawn their objection to the Pride 2026 TEN.

Sussex Police have confirmed that their remaining objection relates primarily to the inclusion of off-sales during the extended hours applied for, citing concerns about the potential for proxy sales once alcohol leaves the premises during those times.

In line with the Section 182 Guidance (paragraph 7.37), a TEN may be modified with the agreement of the objecting Responsible Authority. In this case, the TEN could be modified to exclude off-sales during the extended hours, while leaving the remainder of the TEN unchanged. You may wish to contact Sussex Police directly to discuss whether such an agreement can be reached.

If no modification is agreed and the Police objection remains in place, the Licensing

Authority will be required to arrange a hearing to determine the TEN. We anticipate that this would take place in May 2026, subject to any dates you may wish to avoid, and confirm that the time in which to hold a hearing remains extended until such hearing, if necessary, is held.

Regards, Sarah Cornell | Senior Licensing Officer
REDACTED

Summary of Position sent to Sarah Cornell 31.5.26

Summary of The Camelford Arm's Position re TEN Hearing for 5 June 2026

We are applying for a TEN to operate this year in **EXACTLY the same way** as we have operated (under TENs) for the last 16 years of Pride, when for **ALL those 16 Prides**, there has **never been any incident or complaint**. So, what is suddenly different in 2026?

We are 'Good Operators' (*BHCC def below*) with an **unblemished track record** (inc Prides).

1 The Law AND the Statutory Guidance is very clear and requires:

- Each TEN to be 'a light-touch' process. Last year there were 731 TEN applications in Brighton and ours is the **ONLY** one listed for a Hearing. So it definitely stands out. Why?
- Legally, each TEN **must** be considered on **its own merits** and **cannot** be considered as part of, or aggregated with, a wider event (e.g. city-wide issues / Pride generally). Our TEN **must**

therefore (legally) **ONLY** be considered in terms of our specific venue, The Camelford Arms, and our specific track record. To introduce any other (or wider city / Pride) matters is **NOT** within the law **OR** the Statutory Guidance.

- Any Objection **must** be evidenced-based (again, a **legal requirement**) and **cannot** (legally) rely on speculation or conjecture of ‘*What might happen*’ or ‘*It’s Pride, therefore....*’.

2 The BHCC Statement of Licensing Policy:

- Provides ‘Good Operators’ with a presumption in favour of granting a TEN unless there is “clear and compelling” evidence as to why one should not be granted.
- The Police have confirmed to us that we are ‘Good Operators’ of The Camelford Arms.

3 The Police’s Objection

- The Police’s only Objection is based on Proxy Sales to Minors, even though our Licence does not allow entry to under-18s at any time, not even for Sunday lunch with their family.
- Proxy Sales have never been an issue at our pub, ever, including our 16 previous Prides / Village Parties or at any other time of the year. **Ever**.
- **FACT: *Not a single person has been cautioned, charged, prosecuted or convicted of Proxy Sales at any Pride Village Party in the last four years.***
SOURCE: Sussex Police, FOI Request.
- Proxy Sales were not mentioned in the Police’s official Objection of 10 months ago (29 July 2025). It is **ONLY** this **original** Objection, that can be considered at this Hearing. That Objection was drawn far too widely and ‘blanket’. This is **not** ‘*just a legal technicality*’ – it goes to the

very heart of the TEN legislation, **which requires a specific, individual and detailed approach**.

4 The Evidence

- The Police must provide (i) “*clear and compelling*” evidence that there is a problem with Proxy Sales at our venue and (ii) that this relates to our specific TEN event. They have provided no evidence whatsoever to support their Objection.
- By **stark** contrast, we **have** supplied clear and compelling evidence that Proxy Sales are **NOT** a problem at our pub. We have also shown, via a FOI request, there has not been a single incident of Proxy Sales in the Pride Village Party footprint in (at least) the past four years.

There are many ways in which the Police can manage the wider Pride event, but Part 5 of the Licensing Act 2003 (**the only relevant law this Hearing must use**) - is not one of them.