

Appendix C

REP A - EF Valid on objectives of PCD and PPN

From: Brighton Licensing <REDACTED>
Sent: 11 September 2026 15:52
To: REDACTED; EHL Licensing
Subject: Taco Bell, 134-135 London Road - Licence Variation Representation

Dear REDACTED,

RE: APPLICATION TO VARY PREMISES LICENCE HELD AT TACO BELL, 134 – 135 LONDON ROAD, BRIGHTON, EAST SUSSEX, BN1 4JH UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also refer to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy 2026.

This is a proposed variation to a current licence 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 (SSA) (as defined in the BHCC Statement of Licensing Policy) and seeks the following hours and licensable activities:

Late Night Refreshment (Both)

Every day: 23:00 – 03:00

Opening hours

Every day: 10:00 – 03:00

The premises already holds a licence until 03:00 for late night refreshments however, between the hours of midnight and 03:00, this is only to service home delivery orders. This variation is to remove the condition which currently stops them being able to offer dine in and in person takeaway.

The original application was not objected to by police because it was delivery only so removed all the risks that come with attracting people to a location into the early hours. The current licence was issued in April 2025.

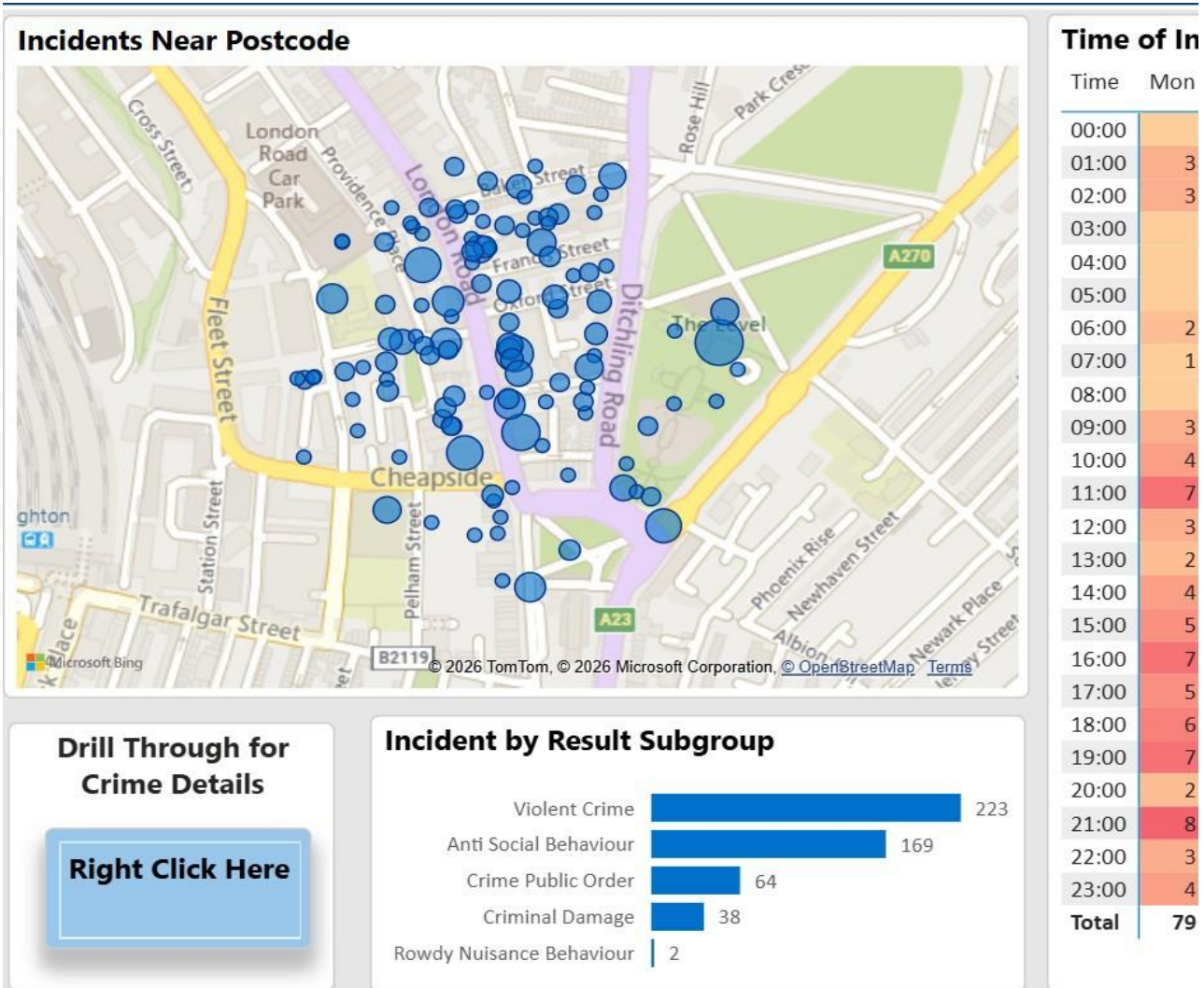
Paragraph 3.3.2 of the Brighton and Hove City Council 2026 Statement of Licensing Policy states:

“This Special Stress Area (SSA) is of concern to the licensing authority because of the relatively high levels of crime and disorder and nuisance experienced within it.”

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering food and drink into the early hours encourages persons to remain in the area or be drawn in to it, which has several residential flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be problematic.

Recent incident figures indicate that during the period of 08th Sept 2025 and 07th Sept 2026 there were 496 incidents linked to London Road and surrounding side roads (200-meter radius). The incidents included in this figure are for violence, ASB, public order and criminal damage.

With the area already experiencing high number of incidents mostly during the daytime, permitting a premises to be open into the early hours is likely to increase incidents in the locality due to the



additional footfall thus having a negative impact, requiring police intervention and public nuisance complaints to the local authority.

Other similar operators along London Road and their advertised opening hours (as of today’s date) and licence permitted hours are:

- KFC** London Rd advertises open until 03:00 7 days a week as per their licence. From 00:30 – this is only for takeaway and delivery only.
- Subway** London Rd advertises open until 23:00 Monday – Saturday and 21:00 Sunday. Licence permits opening until Midnight on a Friday and Saturday.
- McDonalds** London Rd advertises open until 23:45 7 days a week. Their licence permits Midnight.
- Nando’s** London Rd advertises open until 22:00 Sunday – Wednesday and 22:30 Thursday – Saturday. Their licence permits Midnight.

Salt & Charcoal London Rd advertises open until midnight 7 days a week as per their licence.

Dominos London Rd advertises open until 01:00 walk in and 04:00 delivery – no dine in facilities, all takeaway only. Licence permits 04:00 7 days a week and was granted in August 2011.

Fatto A Mano London Rd advertises open until 22:00 Monday – Thursday, 22:30 on Friday & Saturday and 21:30 Sunday. Licence permits 23:00 Monday – Saturday and 22:00 Sunday.

Brighton Chicken & Pizza London Rd advertises open until 02:00 Sunday – Thursday. 04:00 Friday and Saturday. Licence was granted in Feb 2025.

Paragraph 3.4. of the Brighton and Hove City Council 2026 Statement of Licensing Policy refers to the Matrix Approach. Within this, a fast-food venue is only supported until midnight for walk-ins and 02:00 for delivery. As this premises already has a 03:00 licence for delivery and 00:00 for walk-ins, they already have a licence over and above policy.

Paragraph 3.4.4 states that the Matrix Approach will be applied unless the application has exceptional circumstances to depart from the policy. We don't believe a mainstream fast-food venue like Taco Bell would have any exceptional circumstances. Section 3.4.4 (b) goes on to say that an exceptional circumstance could be where the applicant satisfies the criteria for a "good operator". Under this section (3.5.2) the operator has not been trading for at least 3 years, their current licence was granted in April 2025. There have also been breaches since that licence was granted.

Within the current licence there is the following condition:

3. The premises will not operate under this licence until all conditions set within it are evidenced to Sussex Police and the Local Authority Licensing Team as being adhered to.

Once the licence was granted that was no contact from the operator to arrange for us to come and do an inspection prior to them operating under it. We decided to attend on 15th May 2025 to conduct an inspection and found they had not completed a SIA risk assessment nor had any staff training which was breach of their licence conditions. On 14th Jan 2026 we issued a further breach due to ongoing issues with obtaining CCTV from the venue which resulted in a meeting with the area and store manager.

Within the application we note that the applicant is proposing keeping the current conditions on the licence apart from amending Annex 2 Condition 2 to permit customers to dine in and take away in addition the current delivery permission. They are also proposing a condition around security but only being based on a risk assessment.

Although Sussex Police are unable to support this application, should it go before a Licensing committee and the panel being minded granting, we kindly ask that the condition around security is amended as we don't feel the proposal by the applicant goes far enough to promote the licensing objection of the prevention of crime and disorder.

We ask the panel to consider imposing the following 2 conditions:

- There will be a minimum of 1 SIA registered door supervisor at the premises anytime it is trading past midnight, and they will be on duty until the venue has closed.
- At all times the premises is open to the public, the management will contract the back-up services of an approved mobile support unit (MSU) that operates at all times the premises is open to the public, 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 Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.

Condition 5 on the current licence amended slightly to read:

- SIA licensed door supervisors shall be employed on any other occasions when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. In addition to risk assessing events being held at the premises, the risk assessment will take into account information or guidance offered by the police, and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.

If the venue is to stay open late for access to the public, we feel it is appropriate that they ensure they have the safeguarding in place to assist in reducing risks associated with these later hours. We believe the conditions above would enable them to deal with low level issues before they escalate and need to call upon police. They also go some way to promote safety for customers and staff within the venue.

In summary, Sussex Police is unable to support this variation application, and we invite the Licensing Authority to seriously consider refusing it to ensure the licensing objectives are promoted as well as the local authorities own licensing policy.

Yours sincerely,

REDACTED

Licensing & NPT Sergeant
Brighton & Hove Division
Sussex Police



REDACTED

Police Licensing
Officer Level 4 PALO
Qualification

REP B - EF Valid on objectives of PCD and PPN

REDACTED

Date: 23 September 2026

Licensing Team

Brighton & Hove City Council

Our Ref: **REDACTED**

Hove Town Hall

Norton Road

e-mail: **REDACTED**

Hove, BN3 3BQ

Dear **REDACTED**

Licensing Act 2003 - Representation regarding the application for a Variation of the Premises Licence for Taco Bell, 134 - 135 London Road, Brighton, BN1 4JH

Premises Licence Application Reference - 2026/03307/LAPREV

I refer to the application made by Karali QSR Limited for a variation of Premises Licence for the provision of Late-Night Refreshment (LNR) at Taco Bell, 134 - 135 London Road, Brighton.

The proposed hours for LNR are from 23:00 until 03:00 and opening hours to members of the public from 10.00 to 03:00 every day of the week.

The variation also seeks to replace condition 2 in Annex 2 which currently states

“Between the hours of 00:00 (Midnight) and 03:00, the premises will only operate to fulfil delivery orders. Such orders will be made over the telephone or app/website and delivered to a private or work address. i.e. walk-ins or dine in or takeaway are not permitted.”

with the following –

“Between 00.00 hours and 02.30 hours, the premises may provide late-night refreshment to customers for consumption both on and off the premises. No new dine-in orders shall be accepted after 02.30 hours. Customers who have purchased food for consumption on the premises before 02.30 hours may remain until 03.00 hours for the purpose of finishing their meals and dispersing.”

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 and Disorder and the Prevention of Public Nuisance and to uphold our Statement of Licensing Policy 2026 (SoLP).

The premises fall within the Special Stress Area (SSA), which the 2026 SoLP expressly retains as a designated area requiring extra scrutiny because of persistent levels of crime, disorder and nuisance.

This was confirmed during the 2025 review of the policy, where the Committee agreed to retain the SSA in full.

The SoLP requires that premises within the SSA must provide robust, enhanced best-practice measures to mitigate the well-documented risks in this area (3.3.3 of the policy and Appendix A)

The applicant has offered one additional condition within the application relating to security on Friday and Saturday nights but only by way of a risk assessment –

“Where reasonably required by the written risk assessment at least one SIA registered do or supervisor shall be employed during those hours on Friday and Saturday nights as well as other nights when so required.

I do not believe the applicant has demonstrated exceptional circumstances to depart from our policy or how the variation to allow customers to dine in would not impact on existing issues of the area.

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.

Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances.

The Licensing Team makes this representation to uphold the Council's SoLP, which we believe this application contradicts, as The Matrix states that no late-night takeaways beyond 12:00midnight (Deliveries until 2am) should be granted in the Special Stress Area. These premises benefit from a premises licence that permits LNR every day until 03:00 which already exceeds the Matrix approach.

It is my opinion, granting this application is likely to add to the additional burdens and problems in the Special Stress area. The Licensing Team act as guardians of the Council's SoLP and I make this representation on behalf the Licensing Authority as I believe the application made is contrary to our policy and 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

Licensing Officer

Regulatory Services - Licensing Team

