

## **APPENDIX C**

Police Station  
John Street  
Brighton  
BN2 0LA

Tel: **REDACTED TEXT**

Email: **REDACTED TEXT**

25<sup>th</sup> March 2021

The Licensing Technical Support Officers  
Environmental Health, Brighton & Hove City Council  
Bartholomew House, Bartholomew Square  
Brighton, East Sussex  
BN1 1JP

**SC CON ENDS 05.04.21 VALID PCD (A)**

Dear **REDACTED TEXT**

**RE: APPLICATION FOR A NEW PREMISES LICENCE FOR PORTSLADE NEWS,  
43 STATION ROAD, PORTSLADE, BRIGHTON, EAST SUSSEX, BN41 1AG  
UNDER THE LICENSING ACT 2003. 1445/3/2021/00608/LAPREN.**

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 Objective of the prevention of crime and disorder. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

The premises previously held an alcohol licence which was granted in June 2015. Sussex Police submitted a Review of this premises licence on 26<sup>th</sup> January 2021. Following receipt of this Review the then premises licence holders surrendered this licence.

Despite the issues at this address, neither the applicant nor their agent (Personal Licence Courses UK who represented the previous licence holders and so had an awareness of this premises) contacted Sussex Police prior to submitting this new premises licence application.

While the applicant has offered some conditions under Section M, Sussex Police do not believe these go far enough to help mitigate any potential risk in an 'Other Area' as defined within the Brighton & Hove City Council Statement of Licensing Policy.

They also do not address all of the previous issues at this address.

We do not believe at this time the application in its current form addresses the concerns raised and consequently is at risk of undermining the prevention of crime & disorder Licensing Objective.

Sussex Police are not satisfied that the previous owners are not still involved with the premises and so would like to bring this before a licensing committee to have further questions asked of the applicant to ensure that the Licensing Objective of the prevention of crime and disorder will be upheld. Should the licensing committee then choose to grant the licence, Sussex Police would suggest the following minimum conditions, to help mitigate any potential incidents:

### **General**

1. 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.
2. No beer, lager, perry or cider with an ABV of 6% or above shall be sold at the premises save that this shall not apply to premium beer, lager, perry or cider with an ABV of 6% or above such as craft or specialty brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.
3. All alcohol will be displayed/stored in full sight of the serving counter.
4. Spirits will be stored and displayed behind the serving counter.

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

5.
  - (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 entrance to the premises. 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) Subject to GDPR guidance and legislation, 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) 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.
  - (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.
- 6.
- (a) An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. The log will be inspected and signed off by the DPS (or a person with delegated authority) at intervals of no more than four (4) weeks.
  - (b) The log book should 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.
  - (c) Feedback shall be given to staff to ensure these are used on each occasion that a refusal or incident occurs at the premises.
  - (d) Any refusals made for alcohol service e.g. underage, will also be recorded (either in electronic or written form) and feedback given to staff as relevant. The log will be kept for a minimum of twenty four (24) months.

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

- 7. 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.
- 8. Signage advertising the 'Challenge 25' policy will be displayed in prominent locations in the premises.

9. A till prompt system will be in operation at the store and used for the refusal of all age restricted products.
- 10.
- (a) The Premises Licence Holder shall ensure that all staff members engaged or to be engaged, in selling alcohol at the premises shall receive the following induction training. This training will take place prior to the selling of such products:
- \*The lawful selling of age restricted products
  - \*Refusing the sale of alcohol to a person who is drunk
  - \*Refusing the sale of alcohol for consumption off the premises to people who may have alcohol dependency issues
- (b) Further verbal reinforcement/refresher 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/refresher 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.
11. 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.

Yours sincerely,

**REDACTED TEXT**

**REDACTED TEXT**

Licensing Lead  
Local Policing Support Team  
Sussex Police