

## **APPENDIX C**

Brighton and Hove Estate Conservation Trust (The Company) Company no. 05554194

Brighton and Hove,

East Sussex

### **SC CON ENDS 27.05.21 VALID PCD & PPN (A)**

27<sup>th</sup> May 2021

Dear REDACTED,

I am writing to raise a representation against the application for Stanmer House, Stanmer Park

#### **Application Number 2021/01229/LAPREN**

This application was made on the 29<sup>th</sup> April and the closing day for representations is today – 27<sup>th</sup> May.

I am writing as Chair of the Brighton and Hove Conservation Trust, and on behalf of Trust members who have all agreed to this representation. BHECT is a charitable Trust set up some years ago to manage the tenancies at Stanmer Village and with wider responsibilities regarding the heritage and conservation of Stanmer Park and the Downland Estate. Thus, we are objecting on behalf of our tenants who reside in Stanmer Village and also because of our wider responsibilities relating to Stanmer Park.

I understand that the application has been amended to ask for the hours 9.30am-11pm and the request for later hours for regulated entertainment withdrawn, but I cannot find this amendment on the Public register. Even if this is the case, I am still objecting to the application on the grounds of:

#### **Public Nuisance**

Having the premises open – it says café/restaurant/pub until 11pm every night - will attract more people into the park at a later hour because of the variety of services offered, particularly the pub service. There will thus be more noise in the area, especially affecting resident's in the stable block, but also affecting the resident's of Stanmer Village, because of the use of motor vehicles at a late hour. The premises would cause significant disturbance to BHECT tenants in Stanmer Village, both current and future ones, with taxis, cars and people walking, entering the park in the evening and leaving the park late at night, and all the noise and general disturbance that would cause. The park is most definitely not suitable for people to walk anywhere late at night as there is no lighting to assist them. This is a park, it is not an urban area, and thus this type of late-night activity is entirely unsuitable. I would imagine there is an intention to also hold events until 11pm which would include live music etc and this would contribute significantly to noise in the park. The premises would also be

able to apply for 15 TENS a year and that would add to disturbance in the park to residents, also to wildlife in the park.

One of the conditions for a major HLF grant that was given for the development of the park was that there would be fewer motor vehicles in the park, and this application seems to fly in the face of that condition.

### **Crime and Disorder**

I am also concerned about the ability of the police to get to Stanmer House if there were any issues on the nights that Operation Marble runs in the city, as it is some distance away from the area of West St and the lower promenade where police officers are based during Operation Marble. This concern is because there would be two venues operating in very close proximity to each other in the park, and I suspect that both will attract significant numbers of younger people because of their proximity to the University. The chances of crime and disorder are very much heightened because of the numbers of people in this area late at night who will have been drinking, and who may carry on drinking in the park even after the premises are closed.

I have read in the press that the company, KSD Support Services Ltd, have put in an application to build flats in Stanmer House and that they would therefore only run a daytime café. I would argue that this makes it even more important for this application to go to panel, in order to determine exactly what is being asked for so that the appropriate conditions can be placed on the licence, if it is granted. At present there is a tremendous lack of clarity and information regarding this application.

I look forward to receiving receipt of my representation.

Kind regards

REDACTED

## **AGREEMENT**

### **Stanmer House Proposed Conditions**

#### **Licensable activities being applied for a timings:**

Supply of alcohol – On Sales only between the hours of 09:30-23:00 every day.

#### **General**

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.
2. Substantial food shall be available at all times that alcohol is offered for sale on these premises.
3. The consumption of alcohol and other beverages shall be by persons seated at tables and there will be no vertical drinking. Drinks are permitted to be ordered at the bar and carried by the customer to their table.
4. No beer, lager, cider or perry with an ABV over 6% or above shall be sold at the premises save that this shall not apply to premium beer, lager, cider or perry with an ABV over 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.

Additional conditions as stated in original application or agreed with another Agency.

#### **Prevention of crime & 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 and refusals log will be maintained by the premises showing a detailed note of incidents and any refusals that occur in the premises. The logs will be inspected and signed off by the DPS (or a person with delegated authority) at least once a week.
- (b) The log books 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) Any refusals made for alcohol service e.g. underage, will 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.

Additional conditions as stated in original application or agreed with another Agency.

#### **Public safety**

Additional conditions as stated in original application or agreed with another Agency.

#### **Prevention of public nuisance**

Additional conditions as stated in original application or agreed with another Agency.

#### **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) 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

(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.

Additional conditions as stated in original application or agreed with another Agency.

