

APPENDIX C

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Police Station
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22nd February 2018

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

SC CON ENDS 22.02.18 VALID PCD, PS & PCH (A)

Dear Sarah Cornell,

RE: APPLICATION TO VARY THE PREMISES LICENCE FOR HOLLYWOOD BOWL, BRIGHTON MARINA, BN2 5US UNDER THE LICENSING ACT 2003. 1445/3/2018/00353/LAPREV

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above variation application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder, public safety and for the protection of children from harm. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy (SoLP).

This is a proposed licence variation for a premises that is located in Brighton Marina. The application asks for the below conditions to be removed from the Premises Licence:

Annex 2- Conditions consistent with the Operating Schedule

For the Prevention of Crime and Disorder

1. *On Friday and Saturday evenings from 21.00 hours until close 2 SIA staff will be employed at the premises. If at any time thereafter numbers present in the Bowl exceed 200 a third door supervisor will be employed and if the capacity reaches in excess of 400 customers a fourth SIA member of staff will with employed"*

For the Protection of Children from Harm

3. *Access to the bar area will be prohibited to under 18 year olds.*

Sussex Police have concerns over this premises removing the SIA staff on a Friday and Saturday night, and have raised this with the premises and their Agent.

The main concern being that condition 2 under protection of children from harm is still to remain on the Premises Licence. It reads as follows:

2. *At 21.00 any under 18 year old not accompanied by an adult still in the centre will be asked to leave*

This condition has the potential to be breached if there are no SIA doorman on the door to challenge any under 18 year old's entering the premises or asking any young persons to leave.

The applicant proposes that this condition will be managed by the proposal:

"Age checks will be done by staff who know that under 18's post 9pm must be accompanied"

Sussex Police believe this is not a strong enough proposal and is a cause for concern as staff members acting as door staff or security must be SIA accredited. Therefore this could potentially put staff members at risk. Additionally, there is no provision made for staff training around this specific condition and so any member of staff not aware of the restrictions could allow a number of under 18 years to move freely around the premises after 21.00.

Referring to the Statement of Licensing Policy 5.1.3 Part C - *Conditions may be imposed in accordance with operating schedules to protect public safety including where justified (Section C) use of door supervisors, licensed by the security Industry Authority.*

Sussex Police strongly feel the presence of SIA door staff at this venue is reducing crime and disorder and increasing public safety as the premises has not experienced many incidents over the last 12 months on a Friday and Saturday evening. The Premises will be running a risk of increased Crime and Disorder and undermining the Licensing Objectives should SIA door staff be removed due to multiple issues in the locale.

The applicant did not seek pre consultation with Sussex Police prior to submitting their application and a number of proposed conditions have been offered to the Premises and their agent which have been declined.

Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application.

Yours sincerely,

Insp Di Lewis
Licensing & Response Inspector
Local Policing Support Team
Sussex Police