

Response ID ANON-Z7KP-1YB1-9

Submitted to **Statement of Licensing Policy (SoLP) 5 year review 2021**

Submitted on **2020-10-01 13:31:44**

Cumulative Impact Assessment and Special Policy

Q1a Do you agree or disagree with the proposal to maintain the Special policy on cumulative impact and to maintain the current Cumulative Impact Zone?

Strongly agree

Q1b Why do you agree or disagree with the proposal?

Q1b:

The special policy provides certain controls in areas which can be evidenced as higher in crime and disorder and ASB – particularly relating to alcohol and alcohol harms. The areas chosen are saturated with licensed premises and without a special policy then applications could continue to be received and granted without additional scrutiny. As stated in the document each case will be looked at on its merits if taken to a hearing, but the policy makes it clear what these considerations and restrictions are and that any applications will be contested by the relevant authorities so there cannot be allegations of favouritism or corruption.

Q1c Do you have any comments to make about the CIA?

Q1c:

Sussex Police are in favour of the new CIA. It clearly states the evidence that is used to support the continuation of a special policy and why that is required in a vibrant and busy city such as Brighton & Hove.

Special Stress Area (SSA)

Q2a Do you agree or disagree with the proposal to extend the Special Stress Area (SSA) to cover Preston Road and Beaconsfield Road (up to Stanford Avenue)?

Strongly agree

Q2b Do you have any comments about the proposal to extend the Special Stress Area?

Q2b:

Sussex Police provided a lot of the data/evidence for this proposal and are strongly in favour. It is an arterial route out of the city where we have seen an increasing number of premises licence applications in recent years. It creates more of a buffer for the London Road area and focuses on concerns of local residents as well as crime and disorder patterns.

Q3a It is proposed to reduce the terminal times for alcohol to be sold in cafes to 11pm or 10pm in the “special stress area” and “other areas” of the matrix? What do you think is the appropriate terminal times for alcohol to be sold in cafes in the “special stress area” and “other areas” of the matrix?

11:00 PM

Q3b. Why do you consider your chosen time to be appropriate?:

Sussex Police have looked at the data around existing café bars for the previous SoLP review in 2018/19 and there is little police evidence linking higher crime rates to this type of premises. Having a time in line with pubs (who can have until 11pm in the SSA and other areas) seems sensible as appropriate conditions can be applied to ensure no vertical drinking and food availability and should prevent people just applying for a pub/vertical drinking to get later hours. There is always room for discussion with any applicant about their terminal hour and whether they would like to reduce that because of their style of operation e.g. they are a café who generally closes at 10pm during the consultation period. Sussex Police would not recommend a later terminal hour than 11pm e.g. midnight, as this is moving into more pub territory and the night time economy as opposed to a more relaxed seated environment.

What 'other' time should the terminal times for alcohol be?:

N/A

The Marina

Q4a Do you agree or disagree with including the Marina into “Other areas” of the Matrix? (see Related Information above)

Strongly agree

Q4b Do you have any comments about including the Marina into “Other areas” of the Matrix?

Q4b:

Sussex Police believe this will allow better management of licensed premises in the Marina as there are currently few restrictions. Each case would be considered on its own merits and so this still allows applicants an opportunity to show why their application is unique and outside policy. The way the Marina is set up means

there is currently massive residential expansion and applications are more likely to come in for restaurants/cafes and bars catering for day time and then evening trade.

Shopping parades

Q5a Do you agree or disagree that the terminal times for off licences in shopping parades should reflect opening hours of other shops in the parade?

Tend to disagree

Q5b Do you have any comments about terminal times for off licences in shopping parades reflecting opening hours of other shops in the parade?

Q5b:

Sussex Police believe that each case should be taken on its own merits taking into account the surrounding area and the needs of local residents. A continuation of the current matrix which says 11pm but earlier may be considered in residential areas would be the preferred Sussex Police position.

Shared work spaces

Q6a Do you agree or disagree with the inclusion of “shared work spaces” into the notes of the matrix and the suggested paragraph and conditions? It is proposed to amend note 10 of the matrix to clarify that “Non-alcohol led category does not include “alcohol in shared workplaces”. It is recommended that sale of alcohol in shared workspaces should have a terminal hour of no later than 10pm.

Tend to agree

Q6b. Would you like to make any comment about the inclusion of shared work places in the notes of the matrix and the suggested paragraphs?:

Sussex Police agree that this needs to be a note on the matrix to define what such spaces are and to set out expectations e.g. an on-site café where patrons are served and a distinct event space rather than a fridge where patrons/workers can help themselves whenever they fancy. Sussex Police Data doesn't show that police are being called to these spaces and therefore we have no strong evidence to support or disagree with a terminal hour of 10pm. Sussex Police have already had input in creating note 10 on the matrix with suggested conditions that applicants may wish to consider and welcome this definition that 'alcohol in shared workspaces' is a separate consideration to 'non-alcohol led' businesses.

Alcohol delivery

Q7 Do you have any comment to make about the suggested conditions for alcohol delivery in Appendix A of the draft Policy?

Q7:

Sussex Police are in agreement with these suggested conditions as they were put forward by Sussex Police from a selection of conditions that have been used on previous licence applications.

Shadow licences

Q8a Do you agree or disagree with the inclusion of the guidance paragraphs and suggested conditions for shadow licences in 3.10 of the draft policy?

Strongly agree

Q8b Do you have any comments about the inclusion of the guidance paragraphs and suggested conditions for shadow licences?

Q8b:

Sussex Police welcome the inclusion of these paragraphs as Shadow Licences are something we have seen an increase in applications for in the last 3 years. A number of the suggested conditions came from Sussex Police and so we strongly agree with the proposal.

Final comments

Q9 Do you have any comments to make about any other aspects of the draft policy?

Q9:

Sussex Police welcome and support the proposals and further clarification that these changes bring to the revised Statement of Licensing Policy. Many of the questions cover emerging issues that are being seen in the city of Brighton & Hove and provide clear guidance for all users of the Policy and the Licensing Act 2003.

About you

How are you responding to this consultation. As a...

As a representative of a stakeholder group (please give details below)

If you are representing a business, a community, voluntary or statutory organisation, what is your name and who are you representing?:

Claire Abdelkader - Sussex Police

In what 'other' way are you responding to this consultation?:

N/A

