



Brighton & Hove Licensing Unit

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Date: 30th March 2023

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

Dear Emily Fountain,

RE: APPLICATION TO VARY A PREMISES LICENCE UNDER THE GAMBLING ACT 2005 FROM MERKUR SLOTS UK LTD.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the above variation application which has been submitted by Merkur Slots UK Ltd in relation to their venue situated at 9-10 St James Street, Brighton, BN2 1RE on the grounds of:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

This is an application to vary the current operating hours which requires the premises to be closed and cease all gambling activities by 24:00hrs (Midnight) under Premises Licence Number 2021/00929/GABN and extend this to permit 24hrs trading 7 days a week. Although several conditions have been offered by the applicant, Sussex Police believe there is a risk that this could undermine the licensing objectives and have a negative impact on the surrounding area for local residences, individuals, and Sussex Police itself.

When reviewing an application, consideration is taken regarding the premises location and to establish if this area attracts problems in regards to crime and disorder. Sussex Police believes St James Street, Brighton falls within this area of concern. There are regular incidents occurring within the locality requiring police attendance. It is an area that attracts street drinking and drug related offenses. These incidents are primarily during the day and in to the early hours however with the addition of a new 24hrs venue we could see these issues extending throughout the night due to additional people being drawn in to the area.

Although this is not an application for an alcohol licence, we do believe it's appropriate to review the Public Health Framework for assessing alcohol licensing. This is relevant when considering crime and disorder within the area. Queens Park ward of which this premises sits within is ranked 3rd out of 21 wards for police recorded alcohol related incidents.

People under the influence of drink and or drugs is one of main concerns especially when it comes to the safety of staff and customers. Within the operating schedule being offered by the applicant, there is no requirement for the premises to have a minimum staffing level during the night which could result in the premises being staffed by a lone employee. Although they will plan in to have 2 staff members, this is not a condition of opening. Should one go sick the venue can still be open. This would require the individual to deal with refusing entry or having to ask people to leave if they become unruly. Along with refusing entry to banned individuals and deal with persons who might become volatile due to losing money. Customers could also become targeted when leaving the venue throughout the night.

In to the early hours the location does become relatively quiet as many venues on the street have closed. Considering the area is heavily populated with multi occupancy dwellings, by permitting an additional 24hr venue this could impact on noise issues for the residents.

The applicant has provided us with a copy of their local area risk assessment as well as their security ops manual which goes further to evidence our concerns. Within the submission the applicant refers to the locality being higher than average within Sussex for crime recorded by Sussex Police - 82 crimes within half a mile of the premises for December 2022. The majority of these being for violence and sexual offences. And during the last 12 months, violence, sexual assaults, and anti-social behaviour accounting for the highest percentage of crimes reported in the area. Since opening 13 months ago they state they have had 17 incidents, 8 of these relating to aggressive behaviour.

We do acknowledge the presence of a 24hr gambling venue close by however we do not believe this is a reason to automatically permit a second operator trading 24/7. We feel there are significant concerns and challenges within the location and that this application should be heard before a panel to be fully scrutinised and if granted, robust conditions applied to protect employees and customers.

Yours sincerely,

A/Insp Mark Redbourn
Operations & Licensing
Sussex Police
John Street
Brighton