

**Brighton & Hove City Council  
Consultation – Review of  
Statement of Licensing  
Policy – July 2018**



**The British Beer & Pub Association is the UK's leading organisation representing the brewing and pub sector.**

Our members account for some 90 per cent of beer brewed in Britain today, and own around 20,000 of the nation's pubs. A full list of our members can be found [here](#).

Our members operate pubs across the UK and, as such, are impacted by national and local licensing issues. We welcome the opportunity to respond to this consultation and our views are set out below.

## Introduction

The British Beer & Pub Association is the UK's leading organisation representing the brewing and pub sector. Our members account for 90% of the beer sold in the UK and own around 20,000 of Britain's pubs.

The pub plays a vital role in community cohesion and social life in Britain. They remain one of the few places where communities can come together to socialise. The British pub has been part of people's lives for hundreds of years. First and foremost, they are businesses which serve their local communities and contribute much to the social life of each and every community. The pub sector has enormous potential to generate economic growth and create jobs. It can also play an important part in local regeneration projects and has been at the heart of the regeneration of many of our key towns and cities over the last fifteen years. A major study undertaken by Oxford Economics in 2018 clearly identifies the significant local impact of brewing and pubs. Currently over £1.5 billion is invested in the pub sector per annum. Indeed, pubs are labour-intensive businesses so this investment directly correlates to jobs. Pubs employ 600,000 people across the UK, often providing vital work in small towns and villages. Indeed, 45% of those employed in the sector are aged 16-24 providing a vital route to work and first career-step for many young people.

Across Britain, 30 million people visit Britain's pubs each month, with over 15 million people drinking beer.

## BBPA's Concerns and Objections to the Proposed Extension of the "Special Stress Area" (SSA)

We note that the explanation provided by the Council for the proposed extension is:

"The SSA is defined as an area of concern to be monitored for levels of public nuisance and anti-social behaviour (ASB). Applications in the SSA are expected to have a robust operating schedule with appropriate conditions. Unlike the CIZ there is no presumption of refusal. This proposal reflects the number of licensed premises in Church Road Hove, concerns which have been raised by residents and local Councillor in relation to the area, and the evidence from Public Health framework document. The proposal would also be consistent with the current SSA that acts as a buffer to the Cumulative Impact Zone (CIZ)."

We are concerned that the extension of the SSA to cover Central Hove is being proposed without a proper examination of either the current effectiveness in Central Brighton (where there is already a SSA in place), or presentation of a robust justification for the extension itself. In particular there is an absence of evidence that considers the impact of it on the late-night economy and, by direct link, the retail economy generally.

A licensing authority should only adopt, or extend, a SAA if there is evidence that a significant number of licensed premises concentrated in one area is causing an impact on one or more of the licensing objectives.

The Council recognises that any decision to extend the SAA must be evidence-based. By the same token, if there is no evidence it should not be extended. The Licensing Committee minutes (notably March 2018 and June, including the paper supporting Agenda Item 9 of the June 2018 meeting) do not set out the case or the evidence for extending the SSA. No other evidence has been presented by the Council in its consultation to support the proposed extension.

Equally, the consultation does not provide any information about:

- The basis upon which has the geographic boundaries of the SSA have been determined or the criteria used to define the proposed area;
- The criteria that the Council will use when deciding upon licensing applications or variations within the proposed SSA;
- The framework of the measures that applicants will be expected to address if they are located within the SSA;

- How the impacts within the SSA will be monitored (e.g. which indicators will be used).

We note that the Council's intention is to present any evidence collected via this consultation to the Licensing Committee, but failure to present that evidence to a wider audience removes the opportunity for interested parties to comment upon or challenge that evidence.

In offering an opinion, the BBPA would confirm that as noted in the Introduction above, pubs have many beneficial effects, both societal and economic, for the communities in which they are located. Un-evidenced extension of the SSA could limit these benefits and particularly investment potential and the associated job creation.

In the absence of evidence and a case supported by that evidence, we feel that the Council does not have the basis for extending the SSA. On that basis the BBPA objects to the extension of the SSA.

**BBPA contact re this response:**

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