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30 November 2018

Your Ref: .

Our Ref: EH/SM/L6739. /sm

Please ask for:
Sarah Meeten
Environmental Health
Direct Line: (01903)737755

Dear Sirs,

Objection to variation application for Best Kebab, Queensway, Bognor Regis

I act on behalf of the Licensing Authority as a Responsible Authority. The authority is in receipt of a variation application dated 12/11/18. It is contended that the application if granted will undermine the licensing objectives of The Prevention of Crime & Disorder and the Prevention of Public Nuisance.

Essentially the variation seeks:

- Removal of the requirement for use of SIA registered door staff at the premises
- Addition of the sale of alcohol

The above two proposals being made in tandem are alarming to officers, especially in the locality of the premises which is a known anti-social behaviour hot spot. There is concern that the applicant has not considered the needs of the community together with the needs of his business, this being evidenced through the contradictory nature of the proposal. Removing door staff whilst proposing to sell alcohol and failing to offer any adequate alternatives to mitigate the risks that arise from such an activity is considered unacceptable.

Traditionally late night refreshment licences have been granted to such establishments with hours later than nearby alcohol licensed premises with a view to customers being able to purchase hot food and or drink on their way out of the area which accommodates the individual needs whilst assisting to wind down the evening and disperse customers gradually. This application seeks to continue supply of alcohol until between 0100hrs and 0400hrs depending on the day of the week.

The operating schedule proposes conditions that appear to have been lifted from another application in another area, indeed even referring to the wrong police force. Although the content is substantial in wording it lacks enforceable and clear steps that the applicant will

take to ensure that his business does not adversely impact on the local amenity and undermine the licensing objectives.

This local area is focus for authorities working to deal with issues of anti-social behaviour relating to the night time economy. The applicant has not proposed any measures that will suitably mitigate the impact of continued supply of alcohol in this area at such hours of the morning and no consideration appears to have been given to the needs of the local amenity.

Proposed steps in the operating schedule include the maintenance of records and the implementation of proof of age policies. Officers across agencies have commented that they have observed that English language skills of staff appear to be a barrier to communication. It is unclear how the applicant will be able to uphold his obligations if staff cannot effectively communicate with customers.

It is proposed that on and off sales of alcohol may be supplied to those purchasing a 'substantial meal'. The term 'substantial meal' is not defined. The applicant will have no control over customers once they leave the vicinity of the premises and consume alcohol in the streets with their food at the end of an evening.

For those consuming alcohol on the premises in the small amount of seating available, it is proposed that no SIA registered staff are required. In addition there appears to no toilet accessible. Officers have concern of the effects of supply of alcohol at these premises on immediate and wider areas.

The Licensing Authority granting a licence for provision of alcohol (or indeed the operation of a late night refreshment premises) with no SIA registered door staff at such late hours on such a regular basis, in an area with residential accommodation above would not be considered to be fulfilling obligations to promote the licensing objectives in the proposed circumstances.

Yours Sincerely,

Sarah Meeten
Licensing Manager