

APPENDIX 11

**Barwells & Sussex Police
correspondence**



QualitySolicitors Barwells

Established 1896

COMMERCIAL/CONVEYANCING
DEPARTMENT
10 Sutton Park Road
Seaford
East Sussex, BN25 1RB
Tel: 01323 875024
Fax: 01323 890108
DX: 38900 Seaford
QSBCommercial@barwells.com
www.qualitysolicitors.com/barwells

Lewes District Council
Southover House
Southover Road
Lewes BN7 1AB

For the attention of: Mr Michael Moss

Our Ref: PMC/KT/Brumwell BRU21/8

Your Ref: WK/201712466

12 May 2017

By post and email: licensing@lewes.gov.yk

Dear Sirs

Our Clients: Steven Brumwell and Robert Willis
Licence Review upon The Bay Tree Inn Public House now known as The King's Head

Please find enclosed copy letter which we have sent to Ms Catherine Wolfe at Sussex Police.

Yours faithfully

QualitySolicitors Barwells

Directors (May also be referred to as Partners): David George / Tim Morgan / Bill Elliott / Andrews Woods (non lawyer) / Stephen Ash / Nicola Jones / Paul Chaloner / Lauren Charnley.
Authorised and Regulated by the Solicitors Regulation Authority SRA No. 612008. Quality Solicitors Barwells is the trading name of Barwells Legal Limited.
Registered in England and Wales. Registration No. 08645312. Registered Address: 6 Hyde Gardens, Eastbourne, East Sussex, BN21 4PN
Offices at: Eastbourne 01323 411505 / Seaford 01323 899331 / Newhaven 01273 514213 / Peacehaven 01273 582271 / Hailsham 01323 814010





Quality Solicitors Barwells

Established 1896

COMMERCIAL/CONVEYANCING
DEPARTMENT
10 Sutton Park Road
Seaford
East Sussex, BN25 1RB
Tel: 01323 875024
Fax: 01323 890108
DX: 38900 Seaford
QSBCommercial@barwells.com
www.qualitysolicitors.com/barwells

Ms Catherine Wolfe
Bexhill Police Station
Terminus Road
Bexhill on Sea
East Sussex TN39 3NR

By post & email: catherine.wolfe@sussex.pnn.police.uk

Our Ref: PMC/KT/Brumwell BRU21/8

Your Ref:

12 May 2017

Dear Ms Wolfe

Our Client: Steven Brumwell and Robert Willis
Licence Review upon The Bay Tree Inn Public House now known as The King's Head

I write to advise that I arranged a conference with Counsel this morning to discuss the police's application for a review in conjunction with Mr David Lewis-Hall (Counsel), Mr Robert Willis, the new DPS and Steven Brumwell, the Licence holder.

Throughout the statement in support of the application, there is repeated references to evidence documentation and evidence bundle but this has not been supplied. Counsel has advised that the correct procedure would be for our clients to file their responses having had sight of the evidential documents which you have referred to.

Counsel believes that this would enable the matter to be dealt with fully in our client's responses and it is not thought that any prejudice would be suffered by the police in producing the evidential bundle at this stage whereas our clients will potentially suffer prejudice in responding to the statement without sight of the evidential bundle.

It is noted that Lewis District Council have advised that the 28 day consultation period expires upon the 19 May 2017 and we would invite you to confirm that it is agreed that this 28 day period should be extended to be 28 days from when the evidential bundle has been received by us or at the very least that the police consent to a 21 day period for responding.


We have sent a copy of this letter to Michael Moss at Lewis District Council as we understand that there was a very recent meeting between our clients and Mr Moss.

Directors (May also be referred to as Partners): David George / Tim Morgan / Bill Elliott / Andrews Woods (non lawyer) / Stephen Ash / Nicola Jones / Paul Chaloner / Lauren Charnley.
Authorised and Regulated by the Solicitors Regulation Authority SRA No. 612008. Quality Solicitors Barwells is the trading name of Barwells Legal Limited.
Registered in England and Wales. Registration No. 08645312. Registered Address: 6 Hyde Gardens, Eastbourne, East Sussex, BN21 4PN
Offices at: Eastbourne 01323 411505 / Seaford 01323 899331 / Newhaven 01273 514213 / Peacehaven 01273 582271 / Hailsham 01323 814010



Please can we hear from you by return email so that we can advise Counsel as to when the responses need to be filed by. We are particularly conscious of the fact that Mr Brumwell who will be an important witness will be away from the country for a few days from Sunday of this week.

Yours sincerely

PP 

PAUL CHALONER
QualitySolicitors Barwells



Sussex Police
Serving Sussex

www.sussex.police.uk

Alcohol Harm Reduction Unit

16th May 2017

Quality Solicitors
Barwells
Commercial/Conveyancing Department
10 Sutton Park Road
Seaford
East Sussex
BN25 1RB

Your ref. PMC/KT/Brumwell BRU21/8

Dear Mr. Chaloner

I acknowledge receipt of your letter dated 12th May addressed to Cathie Wolfe, which has been passed to me as Head of Licensing and Public Safety.

Sussex Police will not agree to any extension of time limits as proposed by you. The application for review was submitted to the Council on 20th April 2017 and was a detailed document. Furthermore, it is the intention of Sussex Police to serve the evidence bundle in this application by the end of this week. I would have no objection to the hearing being held in the week commencing 12th June 2017. In those circumstances, your clients would have up to 21 days to respond to the evidence bundle, notwithstanding the fact that they have already had a significant amount of time to consider their response to the detail of the application as set out in the application notice.

I should also be grateful if you would confirm whether the purpose of the very recent meeting between your client and the Council's licensing officer was in connection to this review application.

Yours sincerely,

Jean Irving
Head of Licensing & Public Safety

Bexhill Police Station, Terminus Road, Bexhill, East Sussex TN39 3NR
Telephone 101 Ext. 564241



Quality Solicitors Barwells

Established 1896

COMMERCIAL/CONVEYANCING DEPARTMENT

10 Sutton Park Road
Seaford

East Sussex, BN25 1RB

Tel: 01323 875024

Fax: 01323 890108

DX: 38900 Seaford

QSBCommercial@barwells.com

www.qualitysolicitors.com/barwells

Ms Catherine Wolfe
Bexhill Police Station
Terminus Road
Bexhill on Sea
East Sussex TN39 3NR

By post & email:

catherine.wolfe@sussex.pnn.police.uk

Our Ref: PMC/KT/Brumwell BRU21/8

Your Ref:

23 May 2017

Dear Sirs

Licence Queries with Sussex Police

Following on from the conference with Counsel that my clients had recently, it has been suggested that a meeting should take place between my clients and the police with my clients having legal representation at the meeting.

We have just received the notification from Mr Moss at Lewes District Council that the Review Hearing is listed for the 14th June 2017 which is somewhat quicker than anticipated.

Would the police consent to such a meeting in the hope that significant progress could be made in narrowing the issues and hopefully resolving matters to the police's satisfaction.

Yours faithfully

Quality Solicitors Barwells

c.c. Mr Moss at LDC
David Lewis-Hall (Counsel)

Directors (May also be referred to as Partners): David George / Tim Morgan / Bill Elliott / Andrews Woods (non lawyer) / Stephen Ash / Nicola Jones / Paul Chaloner / Lauren Charnley.
Authorised and Regulated by the Solicitors Regulation Authority SRA No. 612008. Quality Solicitors Barwells is the trading name of Barwells Legal Limited.
Registered in England and Wales. Registration No. 08645312. Registered Address: 6 Hyde Gardens, Eastbourne, East Sussex, BN21 4PN
Offices at: Eastbourne 01323 411505 / Seaford 01323 899331 / Newhaven 01273 514213 / Peacehaven 01273 582271 / Hailsham 01323 814010





Sussex Police
Serving Sussex

www.sussex.police.uk

Alcohol Harm Reduction Unit

25th May 2017

Quality Solicitors
Barwells
Commercial/Conveyancing Department
10 Sutton Park Road
Seaford
East Sussex
BN25 1RB

Your ref. PMC/KT/Brumwell BRU21/8

Dear Sirs,

Thank you for your letter dated 23rd May 2017, the contents of which are noted. Given the time restraints set out under the Licensing Act 2003 Hearing Regulations and the necessity to hold the hearing by 16th June, we had anticipated the hearing would be held during that week.

We would be agreeable to an email exchange between the police and the respondent, setting out any proposals, which would enable the police to consider them carefully. We would see no additional benefit in a face to face meeting given the time frames and annual leave commitments, which reduce significantly the available dates in which all parties could meet, including a legal representative on behalf of the police. This email exchange would be considered, and marked without prejudice, and therefore should involve no other parties other than the Applicant and the Respondent.

Yours faithfully,

Jean Irving
Head of Licensing & Public Safety

Bexhill Police Station, Terminus Road, Bexhill, East Sussex TN39 3NR
Telephone 101 Ext. 564241