

## **Appendix C**

**From:** Redacted <Redacted>  
**Sent:** 11 March 2022 19:27  
**To:** EHL Safety <[EHL.Safety@brighton-hove.gov.uk](mailto:EHL.Safety@brighton-hove.gov.uk)>  
**Subject:** Re : 17 Preston Road

**CH CON ENDS 17.03.22 VALID PCD, PPN (A)**

Redacted

Redacted

Redacted

Redacted

11 March 2022

I am writing to object the licencing application made by 17 Preston Road, Brighton.

There are already a high number of off licences in the local area as well as a number of restaurants and public houses. Current residents report that even with the relative calming of lockdown there is still late-night noise, anti-social behaviour and general prevalence of begging and homeless persons for whom alcohol is a chronic problem issue,

Therefore, I strongly feel there is no need for more outlets.

Yours Faithfully

Redacted petition with 63 signatures.

**From:** Redacted <Redacted>  
**Sent:** 11 March 2022 19:54  
**To:** EHL Safety <[EHL.Safety@brighton-hove.gov.uk](mailto:EHL.Safety@brighton-hove.gov.uk)>  
**Subject:** Re:17 Preston Road

**CH CON ENDS 17.03.22 VALID PCD, PPN (B)**

Redacted

Redacted

Redacted

Redacted

11th March 2022

With reference to an application made at 17 Preston Road for licencing at the premises.

I would strongly like to object to the application. I have a Redacted.

Drinkers gather outside Redacted.shouting, assaulting others and causing on going behaviour problems. I am concerned Redacted who have to work late hours.

This application, if passed, encourages street drinking and will poetically add further nuisance to redacted and disturbance to our friendly residences.

Yours Sincerely

Redacted petition with 23 signatures.

-----Original Message-----

From: Redacted <Redacted>  
Sent: 14 March 2022 18:41  
To: EHL Safety <[EHL.Safety@brighton-hove.gov.uk](mailto:EHL.Safety@brighton-hove.gov.uk)>  
Subject: Off license Application.

**CH CON ENDS 17.03.22 VALID PPN (C)**

It has just come to my attention that No 17 Preston Road has made an application for Off License. I would like to reject, as we know that the whole of London Road, Preston Road are full of shops, cafes, bars, pubs where people can be served till early morning. Preston Road is Residential area and we do get a lot of trouble at night. Street drinking or late night taxi stopping out and people waiting for buses already cause a lot of disturbance to our sleeping patterns as some of us have to start work early.

Redacted  
Redacted  
Redacted  
Redacted  
Redacted

-----Original Message-----

From: Redacted <Redacted>  
Sent: 14 March 2022 22:02  
To: EHL Safety <[EHL.Safety@brighton-hove.gov.uk](mailto:EHL.Safety@brighton-hove.gov.uk)>  
Subject: Re 17 preston road

**CH CON ENDS 17.03.22 VALID PCD, PPN (D)**

With reference to an application made at 17 Preston Road for licensing at the premises.

I would strongly like to object to the application. I'm living Redacted.

Drinkers gather in the bus stop redacted shouting and assaulting others which has caused me concern for myself and my girlfriend.

This licence, if passed, encourages street drinking and will potentially add further nuisance to me and my girlfriend and disturbance to our friendly residents.

**From:** Donna Lynsdale <[Donna.Lynsdale@brighton-hove.gov.uk](mailto:Donna.Lynsdale@brighton-hove.gov.uk)>  
**Sent:** 15 March 2022 16:55  
**To:** EHL Safety <[EHL.Safety@brighton-hove.gov.uk](mailto:EHL.Safety@brighton-hove.gov.uk)>  
**Cc:** Corinne Hardcastle <[Corinne.Hardcastle@brighton-hove.gov.uk](mailto:Corinne.Hardcastle@brighton-hove.gov.uk)>  
**Subject:** R&A Global Food Ltd, 17 Preston Road, Brighton BN1 4QE

**CH CON ENDS 17.03.22 VALID PCD, PCH, PPN, SSA (E)**

Good Afternoon

Please see attached my representation for the above application.

This is submitted on the grounds of the Prevention of Crime and Disorder and Prevention, Public Nuisance and Protecting Children from Harm and to uphold our Statement of Licensing Policy (SoLP).

Many thanks

Regards

**Donna Lynsdale** | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing), Safer Communities

Brighton & Hove City Council, 2<sup>nd</sup> Floor, Barts House, Barts Square, BN1 1JP

T 01273 292494 | M 07717 303114 | [donna.lynsdale@brighton-hove.gov.uk](mailto:donna.lynsdale@brighton-hove.gov.uk)

### **Our customer promise to you**

We will make it clear how you can contact or access our services | We will understand and get things done | We will be clear and treat you with respect

**Rate your experience**

We are committed to providing you services in accordance with our [Customer Promise](#).

Please [tell us about your experiences](#) of using Brighton & Hove City Council services. It will take no longer than 5 minutes to complete.

## **CORONAVIRUS - WASH YOUR HANDS MORE OFTEN FOR 20 SECONDS**

**Use soap and water or a hand sanitiser when you:**

- Get home or into work
- Blow your nose, sneeze or cough
- Eat or handle food



### **Protect yourself & others**

For more information go to [nhs.uk/coronavirus](https://www.nhs.uk/coronavirus)

Ms Hardcastle  
Licensing Authority  
Brighton & Hove City Council  
Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP

Date: 15 March 2022  
Our Ref: 2022/00427/LICREP/EH  
Phone: 01273 292494 / 07717 303114  
Email: [donna.lynsdale@brighton-hove.gov.uk](mailto:donna.lynsdale@brighton-hove.gov.uk)

Dear Ms Hardcastle



**Licensing Act 2003 - Representation regarding the application for a New Application for: R&A Global Food Ltd, 17 Preston Road, Brighton BN1 4QE**

**Premises Licence - 2022/00546/LAPREN**

I refer to the application made by R&A Global Food Ltd, for a new Premises Licence to be issued for the above premises. The Licensing Team, in its role as a Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the Prevention of Crime and Disorder and Prevention, Public Nuisance and Protecting Children from Harm and to uphold our Statement of Licensing Policy (SoLP).

The applicant has applied for a Premises Licence for alcohol for consumption 'off' the premises Monday-Sunday 9am to 11pm.

This representation is submitted as there are concerns that the application does not meet the requirements of the Council's SoLP, with regard to applications made within the Special Stress Area of the city. The Special Stress Area (SSA) is of concern to the Licensing Authority because of the relatively high levels of crime and disorder and nuisance experienced within it and we believe that the granting of this application could lead to increased associated issues with regard to crime, disorder and public nuisance in the nearby surrounding area.

The premises has a long history in breaching licence conditions, poor management, failed underage test purchases, non-duty paid (smuggled) alcohol and food safety issues. Resulting in the premises licence being revoked. Although this is a different applicant to the previous premises licence but feel it is important to make the panel aware of the recent troubled history of this premises.

The Council's SoLP includes a Matrix approach for licensing decisions. The SoLP provides a vision of what the Licensing Authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications. Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances.

Guidance issued under S182 of the Licensing Act 2003 states in paragraph 8.33 that in completing an operating schedule, applicants are expected to have regard to the statement of licensing policy for their area. The guidance goes on to say in paragraph 8.35 that applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (in this instance the matrix approach to decision making policy and the special stress area) applicants are expected to demonstrate an understanding of how the policy impacts on their application, any measures they will take to mitigate the impact and why they consider the application should be an exception to the policy.

On looking at the application form, particularly section 16 (licensing objectives), the applicant has not addressed the premise's location within the SSA. They also have not demonstrated exceptional circumstances to depart from our policy or how the grant of a premise licence would not impact on the existing issues of the area.

The applicant also has another premises at 4 Preston Road, Brighton. In November 2013 Brighton & Hove City Council and Sussex Police launched the 'Sensible on Strength' Scheme, which is also supported by other organisations that work with people who are affected by alcohol related harm in one way or another. Businesses were invited to voluntarily stop selling super-strength beer, lager, cider and perry above 6% ABV. The premises had been invited to join the scheme on numerous occasions but always declined.

We maintain that the Matrix Model states that no new off-licence applications should not be granted in the Special Stress Area and note that no exceptional circumstance evidence has been provided by the applicant to warrant departure from this part of the policy.

The Licensing Team act as guardians of the Council's SoLP and I make this representation on behalf the Licensing Authority as I believe the application made is contrary to our policy and therefore invite the panel to refuse the application.

Yours sincerely

Donna Lynsdale  
Licensing Officer  
Licensing Team

Police Station

John Street

Brighton

BN2 0LA

Tel: 01273 404535 ext 550809

Email:

brighton.licensing@sussex.police.uk

16<sup>th</sup> March 2022

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

**CH CON ENDS 17.03.22 VALID PCD, PCH, SSA (F)**

Dear Corrine Hardcastle,

**RE: APPLICATION FOR A NEW PREMISES LICENCE FOR R&A GLOBAL FOOD, 17 PRESTON ROAD, BRIGHTON, BN1 4QE UNDER THE LICENSING ACT 2003. APPLICATION 1445/3/2022/00546/LAPREN**

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds of the prevention of crime and disorder and the protection of Children from Harm. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed new licence application in the City's Special Stress Area (SSA) which seeks the following hours and licensable activities:

Supply of alcohol (Off Sales)

**Every Day:** 09:00 – 23:00

Opening hours

**Every Day:** 09:00 – 23:00

The licensing decision matrix on page 16-17 of the Council Statement of Licensing Policy (SoLP) states that new premises applications or premises licence variations asking solely for the 'off' sale of alcohol in the SSA are indicated as a 'No' under the matrix.

There is no mention of the special stress area in the application, and the concerns relating to crime and disorder surrounding this area.

Preston Road suffers from high levels of crime and disorder. The local area including along London Road and Preston Park has pre-existing issues around high levels of alcohol consumption and anti-social behaviour both of which could potentially be added to with an additional premises with off sales.

There are already a high number of off licenses in the local area as well as a number of restaurants and public houses.

Sussex Police would also be concerned that any alcohol purchased from the premises is very likely to be taken and consumed within the SSA and possibly into the CIZ increasing the risk of anti-social behaviour in the city where many incidents that arise are alcohol fueled. Sussex police feel further incidents may occur as conditions were not offered not to stock over 6% ABV Beers, Ciders and Lagers, or not to sell single cans.

The applicant has not referred to the BHCC Statement of Licensing Policy (SoLP) in their application or offered anything that Sussex Police believe constitutes any reasoning why the SoLP should be departed from. Further, the applicant did not seek consultation with Sussex Police prior to submitting their application and so no further mitigation or exceptional circumstances have been discussed or further conditions offered.

Lastly this premises has a long history of breaching licence conditions due to poor management and has previously failed under age test purchases amongst other reasons which resulted in the previous premises licence being revoked in 2018. This may be a new applicant, but Sussex Police believe the history of this premises is relevant to this application.

Therefore, Sussex Police do not believe that the applicant has offered significant reasoning as to why this would be an exception or why the SoLP should be departed from.

Sussex Police invite the Licensing Authority to seriously consider refusing this application.

Yours sincerely,

REDACTED

Inspector Michelle Palmer-Harris

Licensing – Brighton & Hove Division

Sussex Police

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

