

# LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS) ADDENDUM

**10.00AM, WEDNESDAY, 29 APRIL 2026**

**VIRTUAL**

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# ADDENDUM

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In the Brighton and Hove City Council Licensing Committee

In the matter of an application for a premises licence for Islingword Local, 80 Islingword Road, Brighton BN2 9SL, under the Licensing Act 2003 .

**Witness statement Eyad Mwoas**

1. My name is [REDACTED]. I am the applicant and proposed dps. My birthday is 1 [REDACTED]. I was born in [REDACTED] but I am a [REDACTED]. I have been in the [REDACTED].
2. [REDACTED]  
a [REDACTED]
3. I have entered into a conditional agreement for the lease for the premises. The agreement is conditional on the licence being granted. I plan to operate as a convenience store.
4. The majority of goods will be household and vegetables and food with a proportion being alcohol.
5. [REDACTED]  
[REDACTED] Since then I was working in convenience stores in Brighton. I acquired my first business in 2015 this is in the centre of Brighton. I transferred the licence to me and I have been the dps at the premises since 2015. The premises is the Pop in shop at 47 West street, BN1 2RA
6. I have not had any problems with the business or the premises licence since opening the shop in 2015. The shop is open 22 hours. 07:00 to 05:00 next day.
7. In 2020 I acquired the convenience at Portslade. I transferred the licence to myself and I became the DPS. I have not had any problems with the operation of the business or the premises

To whom it may concern

I believe [redacted] is a responsible member of the local community.

His businesses are well managed and do not cause any disturbance.

I support his application for a premises license and believe he will continue to operate in a safe and responsible manner.

[redacted]  
A long term resident of Portslade old village.  
[redacted]

To whom it may concern,

I have known [redacted] for several years as the operator of local shops in the area.

In my experience, he has always managed his business responsibly + professionally.

His shops are well run and I have never experienced any problems.

I support his application for a premises licence and believe he will continue to operate in a safe and responsible manner

[redacted]

21/04/2026

To Whom it may concern,

This is to confirm that I have known Mr Eyad Mwoas for over 20 years as my local shop keeper. He has been fully responsible for running that shop. The shop is well maintained with friendly staff working there. I fully support his request for a new premises licence for his new shop.

Yours sincerely,



21/4/26

To whom it may concern,

I am a local resident close to the village convenient store in Portside Village & frequent the shop often. I have come to know [redacted] & can vouch he is a responsible member of the local community.

I wholeheartedly support his application for a premises licence & believe he will continue to operate in a safe & responsible manner.

[redacted signature]

22/04/2026

TO WHOM IT MAY CONCERN

I am a LOCAL BUSINESS OWNER IN THE AREA

AND HAVE KNOWN [REDACTED] FOR 10 YEARS

HE IS RESPECTFUL RESPONSIBLE and RUNS HIS SHOPS IN A PROFESSIONAL WAY

I HAVE NEVER HAD ANY PROBLEMS WITH HIS BUSINESS AND FULLY SUPPORT HIS APPLICATION FOR A PREMISES LICENCE and I BELIVE HE WILL CONTINUE TO OPERATE IN A SAFE and RESPONSIBLE MANNER

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# ISLINGWORLD LOCAL

Version 1.0

Consultants  
Expert Report

COMPLETELICENSING.UK



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**A**

Biographies



**COMPLETE  
LICENSING**

# EDWARD SHERRY OBE

## Director of Strategic Licensing & Night-Time Economy

**“Licensing thrives on partnership, intelligence-led policing and calm risk management. My goal is to help operators stay safe, compliant and commercially vibrant-night after night.”**

With more than three decades in the Metropolitan Police, Edward rose to Chief Inspector while specialising in the West End’s world-famous night-time economy. Between 2000 and 2008 he built close, practical relationships with major operators—accompanying Mitchells & Butlers’ security and legal teams on joint patrols through Soho to see issues first-hand.

In 2005 the company invited him inside for a two-week secondment: Edward sat in executive board meetings, shadowed brand managers, and completed licensing-accreditation assessments with new licensees—experience that deepened his understanding of commercial pressures as well as regulatory duties.

Seconded to Westminster City Council soon afterwards, Edward created CivicWatch, an intelligence-led, multi-agency tasking model that united police, council licensing officers and venue management to reduce crime and disorder across key nightlife zones. The Home Office subsequently engaged him to review Southampton’s city-centre night-time economy, with his recommendations forming the backbone of the city’s new licensing strategy.

As Chief Inspector in charge of Charing Cross Police Station, Edward commanded 220 officers providing 24-hour policing— including dedicated night-duty licensing teams—for London’s busiest entertainment district. He later partnered with Westminster’s Licensing Unit to deliver critical-incident and contingency training for leading West End venues and helped the Windmill Club in its attempts to retain its licence during a high-profile review. Consultancy projects have also taken him overseas, training Abu Dhabi Police on policing tourist areas and licensed premises.

Away from day-to-day operations, Edward earned an MSc (Distinction) in Risk, Crisis & Resilience Management and holds a Level 3 Award in Education & Training. In 2017 he was appointed an Officer of the Order of the British Empire for services to young people and policing, recognition that reflects his commitment to safe, inclusive communities.

Today, Edward blends frontline insight with academic rigour to advise venues, event organisers and authorities on licensing strategy, compliance audits, risk assessment, staff training and incident preparedness—keeping people safe while protecting operators’ licences and reputations.

**>> Contact Ed:  
edward@completelicensing.uk**



# RAY BAILEY

## Director of Training and Educational Lead

**“It’s great to be working alongside expert professionals and I look forward to adding a training aspect to the Manu of options.”**

I retired from the Metropolitan Police in 2017 after more than 30 years of exemplary operational service, concentrating on licensing for my final eight. I honed my skills in the West End of London, supervising a team that handled all licensing matters in the City of Westminster. I was heavily involved in the planning and build up to the 2012 Olympic Games, dealing personally with the larger events, while overseeing a team who managed the numerous smaller ones.

I built strong relationships with venue management, security staff, Westminster City Council, and other stakeholders to resolve issues and progress applications. I also designed and delivered training packages for venue managers, staff, and security personnel, to improve awareness and reduce opportunities for crime and disorder. Additionally, I trained police colleagues on licensing matters and served as a nominated trainer for the BIIAB course in Crime Scene Preservation.

I was later seconded to the Home Office’s Drugs and Alcohol Unit, where I helped develop and implement the Government’s Alcohol Strategy, providing a frontline policing/practitioners’ perspective to the licensing regime. I also engaged nationally with trade bodies, police forces, local authorities, and industry leaders on key aspects of alcohol licensing.

After this secondment I became the licensing lead for the London Borough of Bexley. In addition to this role, I was instrumental in devising the revised Borough Licensing and Gambling Policies, as well as bringing training to the menu of any post-incident police response.

Since leaving the Met, I have delivered regulatory training and bespoke courses to diverse audiences. This included teaching new recruit officers a course leading to the Certificate in Knowledge of Policing, enabled them to progress to Police Training School. I am passionate about helping industry professionals to better understand their regulatory responsibilities. This fosters greater awareness, minimises incidents, and ensures practitioners are equipped with the necessary tools to manage issues more effectively when they do occur.

**>> Contact Ray:  
ray@completelicensing.uk**



## **RICHARD BUNCH**

### **Principal Crime Prevention and Licensing Consultant**

**“I’m really enjoying being involved in licensing from ‘the other side’. My years of experience mean I can prevent potential licensing issues with police and other authorities.”**



I retired from the police service in April 2016 after serving in both Sussex and Metropolitan Police Services. Upon retirement, I was issued a certificate of service recognising my exemplary career.

Throughout my three decades of service, I held various roles in both uniform and detective positions, including major crime branches and community policing. At the time of my retirement, I was a substantive sergeant responsible for the police licensing team in the City of Westminster. I also managed several departments as an acting Police Inspector.

I qualified as a divisional and major crime branch detective at the National Criminal Investigation Centre in Maidstone, Kent. Additionally, I became an Advanced Interviewer, Family Liaison Officer, Exhibits Officer, and Disclosure Officer. I have worked on Divisional Drug Squads, Sussex Police Corporate Development Department, Sussex Police Unsolved Crime Investigations, and the Metropolitan Police City of Westminster Homeless Unit. As a qualified Key Decision Maker on CPS Charging Standards, I worked for two years at the country’s busiest custody centre at Charing Cross Police Station. Following this, I served as the Crime Operations Manager for the Oxford Street, Regent Street, and Bond Street crime team at West End Central Police Station. During this period, I co-authored Operation Blizzard, a policing initiative for the busy autumn nights and Christmas period in London’s West End. This initiative, designed to support the West End Business Improvement Districts (BIDs), was successful in reducing crime and disorder and was embedded in the Mayor of London’s policing plan.

My final role was as Licensing Sergeant for the City of Westminster, working in partnership with the City of Westminster Licensing Authority. I was responsible for over 6,500 licensed premises, gaining extensive knowledge in licensing issues, crime and disorder within premises, reviews, and problem-solving through a partnership approach.

During my service in Sussex Police, I worked with licensed premises in rural towns, villages, and larger coastal towns and cities. I received two commendations for bravery and a merit for assisting the Metropolitan Police in recovering a kidnap victim while serving with the Major Crime Branch in Sussex Police. Richard is a member of the Association of British Investigators, which is working with the Law Society of England & Wales.

» **Contact Richard:**  
**[richard@completelicensing.uk](mailto:richard@completelicensing.uk)**

**B**

Senior Consultants  
Report



**COMPLETE  
LICENSING**

## INTRODUCTION

Complete Licensing have been commissioned by representatives of The Islingword Local, situated at 80 Islingword Road Brighton BN2 9SL to undertake a professional review of their application to Brighton and Hove City Council, in-line with the recently introduced Statement of Licensing Policy.

## THE LICENSING REGIME WITHIN BRIGHTON AND HOVE

The area is overseen by Brighton and Hove City Council who have adopted a new approach to licensing which began in January of this year. This new approach has seen the introduction of the City Safe Area (CSA) and the adjoining Special Stress Area (SSA), rather than it's historic Cumulative Impact Zone.

The 'Islingword Local' sits centrally within The Special Stress Area and as such the management are expected to demonstrate steps it will take to minimise the potential harm it may cause.

Section 3.3.4 (f) of the new Licensing statement deals with off licences and states *'Particular consideration will be given to applications for off-licences in areas which already have one or more off-licences in close proximity, due to concerns about street drinking, underage sales and anti-social behaviour.'*

It goes onto explain

*'Where relevant representations are made raising these issues, the application is likely to be refused or, if it is appropriate to grant the application, granted subject to a terminal hour in line with neighbouring off-licences.'*



## **THE PREMISES**

The premises is currently closed and under renovation. The owner, Mr Eyad Mwoas, seeks to open a small licensed convenience store, selling alcohol from 8am until 11pm. The owner views the sale of alcohol as secondary to the sales of other goods. It is my understanding that Mr Mwoas has two other businesses in the area, neither of which has come to the notice of police or other authorities while he has operated them.

## **VISIT TO AREA BY MR RAY BAILEY OF COMPLETE LICENSING**

Mr Bailey visited the area on Thursday 23<sup>rd</sup> April 2026, arriving at 11am and his report is set out at Appendix I attached.

During his visit he found the area to be quiet with no signs of any street drinking in the area. He visited a number of other premises during his visit, and observed a variety of alcohol on sale. Mr Bailey met the owner who was keen to stress that his ambition is to be primarily a convenience store able to sell alcohol, rather than an off-licence that sells oddments of food or household items.

Mr Bailey was clear that he could not make any observations on how the premises will operate as it is not yet open. However, he was of the opinion that Mr Mwoas would seem to fit within the 'good operator' status as set out in s.3.5.2 of the Statement of Licensing Policy.



## CRIME STATISTICS REPORT PREPARED BY CONSTABLE RICHARD BUNCH

Mr Richard Bunch undertook a review of publicly available information relating to crime and other issues within the local area and his report can be found at Appendix II attached. In his report he highlights that a small business of this nature in a large residential area would probably be beneficial to the area.

He notes that representations made by both the police and local authority are policy based with no evidence to suggest that this premises will have any adverse effect on the immediate area or the emergency services.

Mr Bunch goes on to highlight the crime statistics in the area do not appear significantly higher than would be expected and appear to have been at consistent levels for the last 3 years.

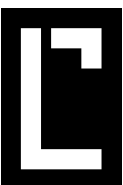
It is worthy of note that local policing priorities for the area do not concern activity that could emanate from this premises.

Mr Bunch concludes

*'The premises will not draw large crowds such as a bar or nightclub. In real terms from my professional and expert opinion unlikely to bring about street drinking, anti-social behaviour, crimes of violence or any form of crime spike.'*

Section 3.7 of the Statement of Licensing Policy 2026.

This section of the licensing Policy deals with off-licences, with section 3.7.3 highlighting good practice that may be included in operating schedules. These have been reproduced below at Table 1, with action that has been taken by the owner to provide reassurance that they have been considered and, where appropriate, will be adopted by the premises.



3.7.3 Areas of best practice that may be included in an Operating Schedule include	Evidence provided by applicant
the installation of a digital CCTV system by liaison with, and to a standard approved by Sussex Police	Yes, As outlined by Mr Bailey of Complete Licensing
Challenge 25 policy	Yes, as set out by Mr Bailey of Complete Licensing
refusals system	Yes, as set out by Mr Bailey of Complete Licensing
documented staff training, including underage sales, drunkenness and proxy sales	Yes, as set out by Mr Bailey of Complete Licensing
voluntary restriction of high-strength alcohol - operating schedules may be used to limit high ABV beers, lagers and ciders	No intention to sell high strength beer or cider, as set out by Mr Bailey of Complete Licensing
BCRP membership (or other accredited scheme)	The premises owner has appropriate connections for his other premises.
no sale of single cans	No intention of doing this
displays should not be located at the entrance/exit points or near checkouts	Agreed, as set out by Mr Bailey of Complete Licensing
restrictions on types of alcohol, e.g. specialist or geographical region only being sold	This would not appear to be applicable

Table 1. Highlighted good practice



## FINDINGS

The premises does sit with the SSA as set out within the licensing policy. However, it is a small premises which does not seek to make the sale of alcohol it's main business, rather an additional offer to the sales of other goods. The owner, Mr Mwoas has two other businesses in the area, neither of which has come to the notice of the authorities. The owner has invested significant money to establish the business which is currently closed and hopes to employ at least 2 other local people when the premises is open. He has taken significant steps to assist in outlining his business model and his determination to uphold the licensing objectives which are highlighted in In Table 1.



## RECOMMENDATIONS

I have set out some recommendations for additional conditions that may be helpful in providing reassurance that the premises is committed to upholding the Licensing Objectives. In addition more details conditions can be found in Appendix D.

- Commit to engaging with responsible authorities and local community to resolve issues as they arise
- The premises will not serve known street drinkers
- The premises will ban customers who they suspect to be buying alcohol on behalf of minors
- Ensure appropriate signage is in place
- The premises will keep a record of all people who have been banned from the shop
- The premises will work with other local premises to maintain records of those who have been banned from other premises
- The premises will share these details with the police or other authority upon request
- No selling of high strength beer or cider
- No selling of single cans of alcohol



## CONCLUSIONS

Mr Mwoas appears to be a serious business operator who runs two other premises in accordance with the licensing objectives. Both Mr Bailey and Mr Bunch of Complete Licensing agree that should the premises be successful in gaining their licence for the off sales of alcohol, then it will little to no impact on the local area.

After reviewing all of the facts, I find myself agreeing with their findings and I feel confident that if the committee were to be mindful in granting this application, it will not have a determinantal impact on their commitment to upholding the licensing objectives.



**Edward Sherry OBE**



## EXPERT'S DECLARATION (CIVIL CASES)

I Edward Sherry declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
  - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
  - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
  - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
  - I may be required to attend Court and/or Licensing Committee to be cross-examined on my report by a cross-examiner assisted by an expert;
  - I am likely to be the subject of public adverse criticism by the judge if the Court and/or Licensing Committee concludes that I have not taken reasonable care in trying to meet the standards set out above.
12. I have read Part 35 of the Civil Procedure Rules, the accompanying practice direction and the Guidance for the instruction of experts in civil claims and I have complied with their requirements.
13. I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

## STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge, I confirm, are true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

## DISCLAIMER

This report was completed by Complete Licensing Limited based on a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the contract terms with the Client, considering the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project. Complete Licensing Limited accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works. This report is issued confidentially to the Client and Complete Licensing Limited, which has no responsibility whatsoever to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk. Unless specifically assigned or transferred within the terms of the agreement, Complete Licensing Limited retains all copyright and other intellectual property rights on and over the report and its contents.



**C**

# Observations Report



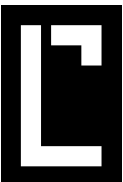
**COMPLETE  
LICENSING**

## MY BRIEF WAS TO:

- provide a report on the characteristics of the location
- assess whether the proposed grant of a Premises licence would make any material difference to the environment at this location,

I was asked to particularly consider:

- the nature of the surrounding area,
- the existing number and type of licenced premises in the immediate vicinity,
- pedestrian activity in the vicinity and the likelihood of attracting street drinkers to the location,
- What measures the applicant was planning to put in place to promote and support the licensing objectives.



## OBSERVATIONS REPORT

In accordance with the above instructions, a visit was conducted on Thursday 23<sup>rd</sup> April 2026. I arrived just before 11:00 and initially conducted a visual inspection of the outside of the premises and the area in which it is situated. This premises is undergoing substantial building and renovation works. It is therefore not yet trading. Previous signage on the outside indicates this was a post office. This is a small shop, with customer access via a single door.

This venue is situated at the Queen's Park Road end of Islingword Road, at the top of the hill between the Islingword Inn, a public house, and the Stanford Medical Centre. There is a small block of flats opposite, and a small green on the far (sea) side of Queen's Park Road. This has benches available for people to sit, and there was a stall operating there at the time of my visit. Islingword Road itself is predominantly residential, as are the surrounding streets. Contained within these streets are local businesses, including Estate agents, restaurants, coffee shops and other amenities including a small community theatre.

I saw no evidence of street drinkers or their litter on my travels. There were dustbins to be seen outside the terraced houses in the narrow streets as well as litter bins along the pavements. The whole area was very quiet on this sunny day.

A trawl through the Public Health Framework for Assessing Alcohol Licensing (Source: <https://public.tableau.com/app/profile/brightonhovepublichealthintelligence/viz/PublicHealthFrameworkforAssessingAlcoholLicensing/NavigationPage>) reveals that there is a total of 28 licenced premises in the subject ward of Hanover and Elm Grove.

Closer inspection reveals that there are eleven within the categories of 'Off sales – other convenience stores', 'other convenience stores (24 hour)', 'Others and others (24 hour)' and 'Petrol stations' and 'Petrol stations (24 hour)'. This leaves out 'on sales' premises (e.g. pubs and restaurants etc).

These figures are somewhat misleading and further interrogation of this site reveals only nine off licence/convenience stores and 15 'on' licenced premises. I therefore assume that



the figures originally quoted are licences issued rather than licenced premises and that some premises may possess more than one licence. It was not possible to view the licences for these premises online. Additional information about licensed convenience stores and other licensed premises in the Hanover and Elm Grove Ward can be found in Appendix 1.

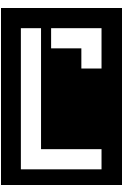
Notably, two of the letters of objection to this application emanate from 231 Queen's Park Road, a potential business competitor. This leaves me wondering whether these objections are solely based upon the promotion of the licensing objectives or other business considerations.

I visited a number of these local off licences/convenience stores and found that some had impressive displays of their alcoholic fayre, while others only had a token selection, favouring other domestic items.

I met the applicant, Mr Eyad Mwoas at the premises at 12:45 and he described the proposed operation of the business. This is to be a convenience store, selling groceries and household items for the benefit of local residents. He hopes to be able to sell alcohol as ancillary to this and was keen to stress that his ambition is to be primarily a convenience store able to sell alcohol, rather than an off-licence that sells oddments of food or household items. He anticipates that the greater proportion of his revenue will be from the sale of groceries etc.

He described the proposed layout of the premises, with displays of groceries and household items at the front of the premises (nearest the entrance door), with the sales counter towards the rear on the left-hand side. If he were to be granted a licence to sell alcohol, the displays would be at the rear of the premises, with any spirits behind the counter and available only upon request. He has no wish to sell high strength beers, nor single cans as these can attract street drinkers. Wines would be either displayed as self-service items on shelving or in fridges – depending on the storage requirements of those products.

He is planning to install a comprehensive CCTV system which will cover entry and exit points, (with a camera facing both ways, inwards and outwards) that will be able to capture



facial images of those entering and leaving the premises. Other cameras will cover the sales counter from different angles and other key areas of the shop floor. He anticipates there will be eight cameras in total, all recording in real-time and in a digital format, with images kept for at least 31 days. He is familiar with the operation of CCTV systems and has already provided footage to police in relation to incidents outside his other business outlets.

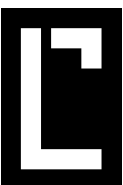
Sales staff will receive induction and then periodic regular training in the responsible sale of alcohol. He anticipates employing two staff members; one for the morning shift, the other for the evening. He was receptive to them obtaining a personal licence, but equally happy for them – once trained, to make sales under a letter of delegated authority. He does not intend to engage in or process remote alcohol sales. He is seeking to be able to sell alcohol between 08:00 and 23:00 hours and would therefore not be able to sell to those leaving other licenced premises pubs after their terminal hour.

The age verification policy will be Challenge 25, and we discussed the siting of suitable notices at the entrance, around the drink displays and behind the sales counter. Other notices discussed included zero tolerance to abuse/drugs. He is keen to become part of the local community and local life and is therefore proposing to place suitable signage by the front door requesting customers respect the neighbours and leave quietly.

Any incidents will be recorded in a suitable book, which will be made available to Police or local authority personnel upon request. Mr. Mwoas is also evaluating the option of contracting a mobile security firm capable of addressing staff requests for assistance with confrontational incidents. If necessary and adopted, any request would be made using a radio held at the venue.

Mr Mwoas is alive to the type of problems encountered in this industry and showed willingness to adapt systems and implement changes as necessary.

Based on my observations during today's visit, daytime business activity appears very limited, with trade likely to increase later in the day as residents return home. Weekend trade may be brisker, particularly in the summer months.



## CONCLUSIONS

This operator is an established licensee with two businesses within the Brighton and Hove area. One such premises has been operating since 2015 and is licenced to sell alcohol from 07:00 through until 05:00 the next day, seven days a week. The other has been under his control since 2020 and is licenced to sell alcohol from 08:00 until 23:00, Monday to Saturday, and from 10:00 until 22:30 on Sundays. He assures me that neither outlet has come to the notice of Police or the Licensing Authority for anything negative during his involvement with those premises. He has however occasionally been approached and provided CCTV footage to the Police in relation to incidents near, but not emanating from those premises.

I have read the Statement of Licensing Policy issued by Brighton and Hove City Council, and particularly those portions that relate to the Special Stress Area (SSA) and Off Licences. At the time of my visit there was no obvious evidence to suggest that this locale suffers particularly from antisocial behaviour associated with street drinking.

There are several other licenced venues in the area, but although the wish is to sell alcohol from this premises, this is ancillary to the provision of groceries and other household goods. The footprint of this shop is small and its impact on the area is likely to be the same. Given the small nature, size and capacity of this business and other convenience stores like it, I suspect that the crimes that are committed on this Ward are more likely to be linked to the larger number and capacity Pubs and on-licenced venues.

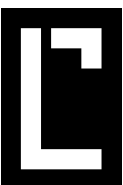
The applicant has a good track record of running this type of business and it is for the committee to decide whether this would qualify him as a 'Good Operator' as defined in s.3.5.2 of the Policy. He has identified risk factors and proposed conditions to mitigate those risks. I have not however had sight of the licence application, so cannot comment on whether these were accurately communicated to the responsible authorities or other interested parties.



## RECOMMENDATIONS

It is impossible to make any comments about the operation of this premises due to the building works that are currently underway and the fact that is not yet trading. Neither can I comment on the systems that have been discussed above, as they have yet to be implemented. I would however encourage Mr Mwoas or his representative to contact those Responsible Authorities that have raised objections to this application and make attempts to allay any fears that they may have. This may be by way of offering conditions to be added to a licence, should the LSC feel minded to grant.

A comparable strategy could be implemented with his neighbours and local community members who have expressed concerns. It is essential however to conduct this process with diligence, ensuring that no pressure or undue influence is exerted or perceived.



## EXPERT'S DECLARATION (CIVIL CASES)

I [Name] declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
  - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
  - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
  - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
  - I may be required to attend Court and/or Licensing Committee to be cross-examined on my report by a cross-examiner assisted by an expert;
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12. I have read Part 35 of the Civil Procedure Rules, the accompanying practice direction and the Guidance for the instruction of experts in civil claims and I have complied with their requirements.
13. I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

## STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge, I confirm, are true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

## DISCLAIMER

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# Annex 1



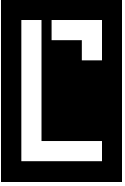
**COMPLETE  
LICENSING**



PREMISES NAME	LOCATION	POST CODE	DISTANCE FROM VENUE	TIME ON FOOT
M&A Convenience Store	Lewis Road nr j/w Melbourne Road	BN2 3LG	0.2 mile	5 mins
Lewis Road Convenience Store	Lewis Road j/w Elm Grove	BN2 3LA	0.4 mile	12 mins
Phoenix Arts Association	Richmond Terrace j/w Richmond Place	BN2 9NB	0.5 mile	11 mins
Southover Convenience Store	Southover Street j/w Washington Street	BN2 9UD	0.3 mile	6 mins
Southover Wines – Possibly not trading or closed	Southover Street near Scotland Street	BN2 9UE	0.2 mile	5 mins
Food and Wine Store	122 Islingword Road	BN2 9SG	0.2 mile	43 feet
Elm Grove Post office – maybe ident with Hanover Convenience Store	Elm Grove j/w Bentham Road	BN2 3DB	0.3 mile	8 mins
SS Food and Wine – maybe ident with Happy Shopper and 122 Elm Grove	122 Elm Grove, nr j/w Luther Street	BN2 3EL	0.4 mile	12 mins
Queen's Park Wines Source of two objection letters	231 Queen's Park	BN2 9ZA	0.3 mile	8 mins



Premises name	Location	Post Code	Distance from venue	Time on foot
Lewis Road Inn	158 Lewes Road	BN2 3LF	0.5 mile	11 mins
The Gladstone PH	123 Lewes Road	BN2 3QB	0.7 mile	15 mins
The Hartington PH	41 Whippingham Road,	BN2 3PF	0.4 mile	10 mins
Fox on the downs PH	291 Elm Grove	BN2 3EA	0.7 mile	17 mins
Wellington PH	53 Elm Grove,	BN2 3ET	0.3 mile	7 mins
The Admiral	2-6 Elm Grove,	BN2 3DD	0.4 mile	8 mins
Village	129 Islingword Road	BN2 9SH	0.3 mile	6 mins
The Greys	105 Southover Street	BN2 9UA	0.3 mile	7 mins
The Geese have gone over the water	16 Southover Street	BN2 9UA	0.3 mile	7 mins
Dover Castle	43 Southover Street	BN2 9UE	0.2 mile	5 mins
Sir Charles Napier	50 Southover Street	BN2 9UE	0.2 mile	4 mins
Constant Service	96 Islingword Road	BN2 9SJ	0.1 mile	2 mins
The Independent	95 Queens Park Road	BN2 0GH	0.2 mile	4 mins
Islingword Inn	175 Queen's Park Road	BN2 9ZA	95 feet	1 min



Cobden Arms PH	45-46 Cobden Road	BN2 9TJ	0.2 mile	4 mins
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**D**

# Crime Statistics Review



**COMPLETE  
LICENSING**

# 1. BACKGROUND & INSTRUCTION

- 1.1 I have been instructed by the owners/operators and the representing legal team to produce an expert witness report to assist with the application for a premises licence at a convenience store known as Islingword Local, 80 Islingword Road, Brighton, East Sussex, BN2 9SL
- 1.2 This report will form part of a package of evidence and information for consideration of the licensing sub-committee for that area. This report is to be used in conjunction with that of the reports produced by my colleagues at Complete Licensing Limited.
- 1.3 I will be reporting on and making comments on the following key areas following the representation made by Police and the Local Authority:
  - Local Policing Priorities
  - Local Crime Figures
  - Highlights of crime figures
  - Premises contribution to local crime figures
  - Premises Inclusion on Policing Priorities
  - Revue of overall crime figures
  - Impact on Special Stress Area
  - Experts' opinion on the impact the premises is likely to have on crime, disorder and public safety
  - Expert opinion on the premises successfully promoting the licensing objectives.



Image 1 – Street View Image of 80 Islingword Road (Old Post Office)





Image 2 – Satellite View – Location 80 Islingword Road

## 2. PREMISES

- 2.1 The premises is located directly next to the Islingword Inn Public House. It is at the junction of Queens Park Road which is the main route through the area.
- 2.2 The premises will be operating as a small convenience store and off licence. The owner and operator of the proposed business is Mr. Eyad Mowas. He has two other like businesses within the Brighton & Hove area. Both these premises operate with a premises licence for the sale of alcohol. This would indicate that the owner and operator of this business can be considered to be suitable to hold such a premises licence within this area.
- 2.3 From my colleagues report the premises is undergoing extensive renovation works. Throughout these works consideration is being given to the layout and crime prevention measures.
- 2.4 It must be noted that the primary business will be for the sale of groceries and the sale of alcohol will be ancillary and just a very small proportion of the business make-up.
- 2.5 As a small business of this nature the large residential area that surrounds it will probably benefit from a business of this nature.



- 2.6 Should the premises be granted the premises licence this will be for off sales only. The premises is not going to draw large crowds to it.
- 2.7 The Islingword Local convenience store will be operating next to a public house. It must be remembered that although both will have a premises licence for the sale of alcohol they are operating as two completely different businesses and are unlikely to have any adverse effect on each other.



### 3. REPRESENTATIONS

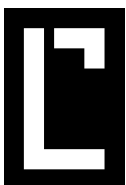
- 3.1 I note with interest the representations made by the Police and the Local authority. Both centre around the Special Stress Area (SSA) in which this premises is located. These representations are policy based with no evidence to suggest that this premises will have any adverse effect on the immediate area or the emergency services.
- 3.2 Objections from the local authority comment on the fact there has been a lack of adherence to the licensing policy with regard to the application. They also feel that a business of this nature **could** have a negative impact on the area.
- 3.3 Other representations have been made by the owners of similar businesses in the immediate area. From personal experience these representations are not made from their concern that the licensing objectives will not be promoted. The representations are made from their concern that such a business opening will have an adverse effect on their own income.
- 3.4 There is one representation from a local resident stating she is concerned about the sale of alcohol by another business in the area. She also comments on that fact the owner of this premises has come to the notice of the Police before with regards to the sale of under the counter goods and essentially criminality. There has been no evidence produced by the Police or the Local Authority which includes Trading Standards, giving any concerns regarding the operations of my clients other businesses.
- 3.5 I presume the Police and Local Authority have completed their due diligence on the owners and operators of this proposed business and in turn would have commented on the suitability of the applicant. There has been no adverse comments submitted.



## 4. Crime Figures

- 4.1 The Police have commented on the amount of crime within the SSA. I have taken advantage of producing crime statistics for your consideration and crime hotspots for the immediate area.
- 4.2 These crime figures and hotspot maps have been obtained from open-source material available on the Police UK website. The data provided on these figures is taken from crime submissions from Sussex police. I must presume these figures are accurate due to their origin and public availability.
- 4.3 The proposed premises will sit within the Sussex Police Elm Grove Police area. I have included the current list of Policing Priorities for the area which were last updated in March 2026 so a recent and active with proposed action plans.
- 4.4 There are three in total and include. **1. Drug Dealing on Hanover Street and Terrace. 2. ASB on Wellington Road. 3. E-Bikes being ridden at high speeds through the Police area.**
- 4.5 There is no mention of violence, public order, street drinking, rough sleeping that you may consider giving cause for concern that there may be an issue with regards to the licensing objectives not being promoted.
- 4.6 The crime figures I have produced only run until February 2026. It is unusual for figures to be delayed in this way, but I can only work up to that date. You will see from the figures produced below I have produced graphs which include crime numbers and type recorded within the Elm Grove Police area for that latest month.
- 4.7 In addition to this you will see figures for rolling 12 and 3 years both by numbers and type. You will note that there is an increase in criminality through the summer months dropping off through the winter period. These figures are consistent year by year and of a number and type you would expect to see in a city area of this nature across the country.
- 4.8 The crime hotspot maps produced detail the number of crimes recorded each month in the Elm Grove Police area. I have detailed six months' worth of figures from September 2025 to February 2026. In total 267 crimes were recorded. I have highlighted in blue the crime hotspots nearest to the location of the proposed Islingword Local Store. These crimes total 11 or 4.1% of crimes committed within the Elm Grove area. You will note that the majority of these blue highlighted hotspots have taken place some considerable distance from the Islingword Local site. Of the 11 offences I have highlighted these include 5 thefts, 1 anti-social behaviour, 1 robbery, 1 criminal damage. There are also 3 crimes of violence recorded. These cover a large scope of offence type and can include domestic incidents and common assaults. I do not have the ability to drill down into these further.





# ELM GROVE POLICE AREA

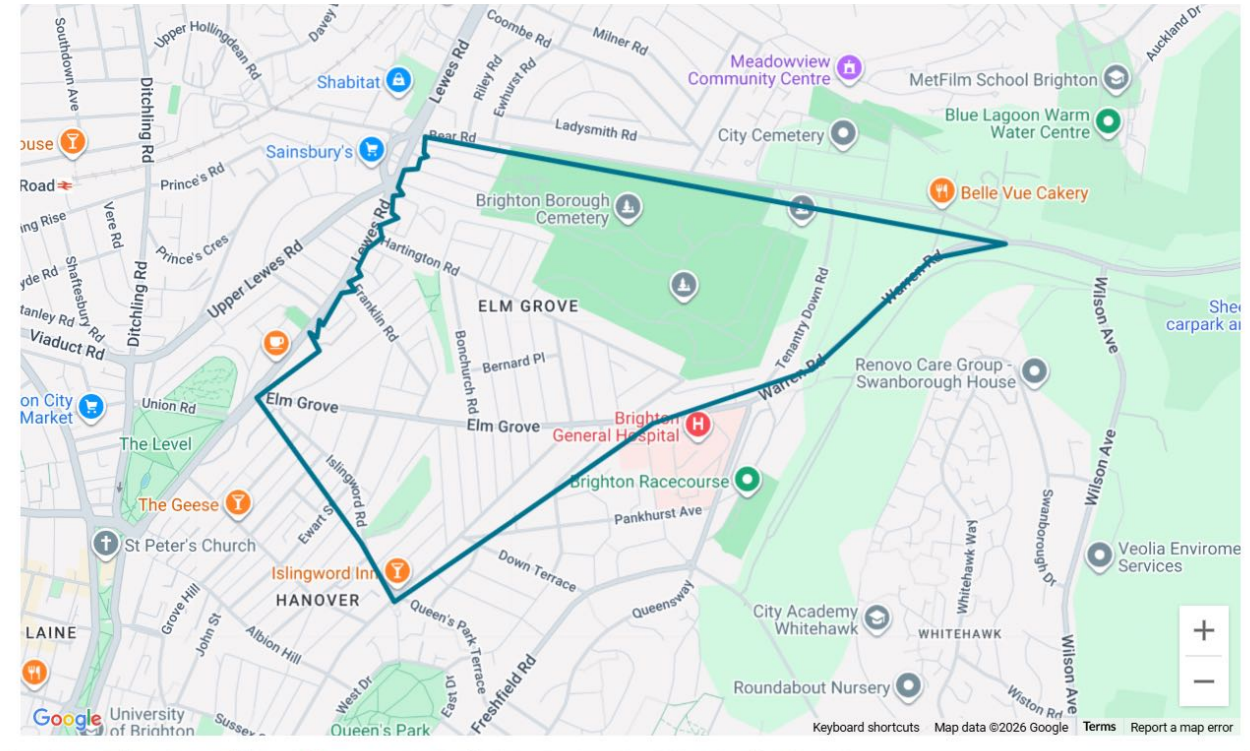


Image 3 – Sussex Police Elm Grove Police Area



# POLICING PRIORITIES

About us	Your team	<u>Policing priorities</u>	Meetings and events
<b>Priority:</b>		<b>Action taken:</b>	
Drug Dealing on Hanover Street and Hanover Terrace. Issued 31 October 2025		Increased hi-viz foot patrols in the affected areas and surrounding streets. Engaging with members of the local community to encourage reporting. Actioned 31 March 2026	
ASB on Wellington Road Issued 31 October 2025		Engagement with members of the public, encouraging reporting of any issues in the area. Increased patrols to deter and provide reassurance. Actioned 31 March 2026	
E-Bikes being ridden irresponsibly at high speeds. Issued 26 September 2025		Targeted patrols. Engagement work with riders to offer advice on riding safely. Actioned 31 March 2026	

Image 4 – Recorded Police Priorities Elm Grove Police area



Image 5 – February 2026 Crimes by type and rolling 12 months Elm Grove Police area



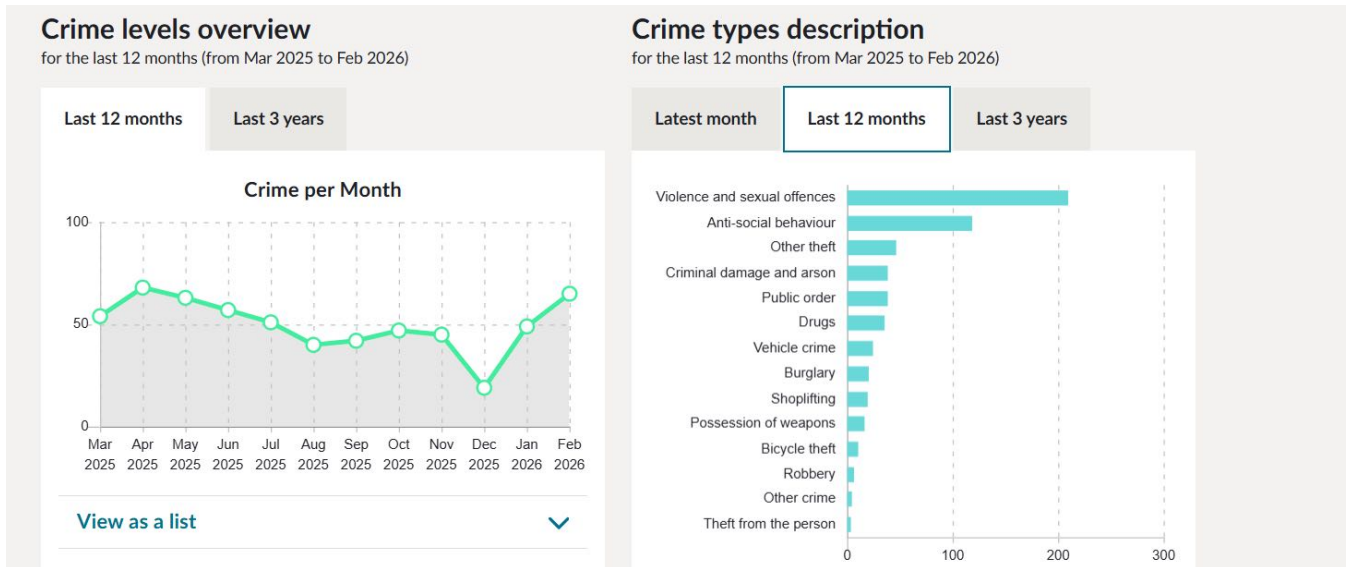
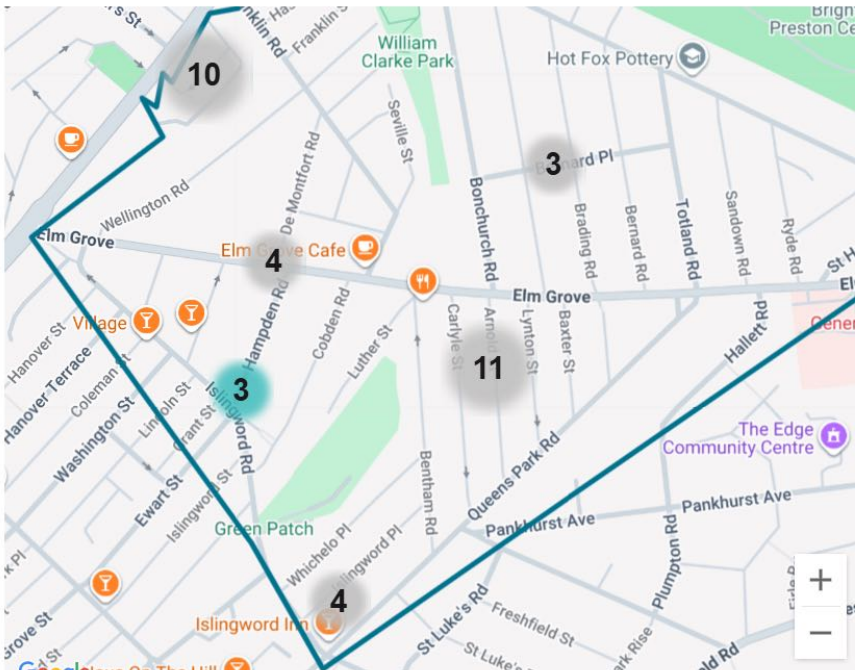


Image 6 – Rolling 12 months crime figures and by type Elm Grove Police area



Image 7 – Rolling 3 year crime figures and by type Elm Grove Police area





All Crimes (65)

February 2026

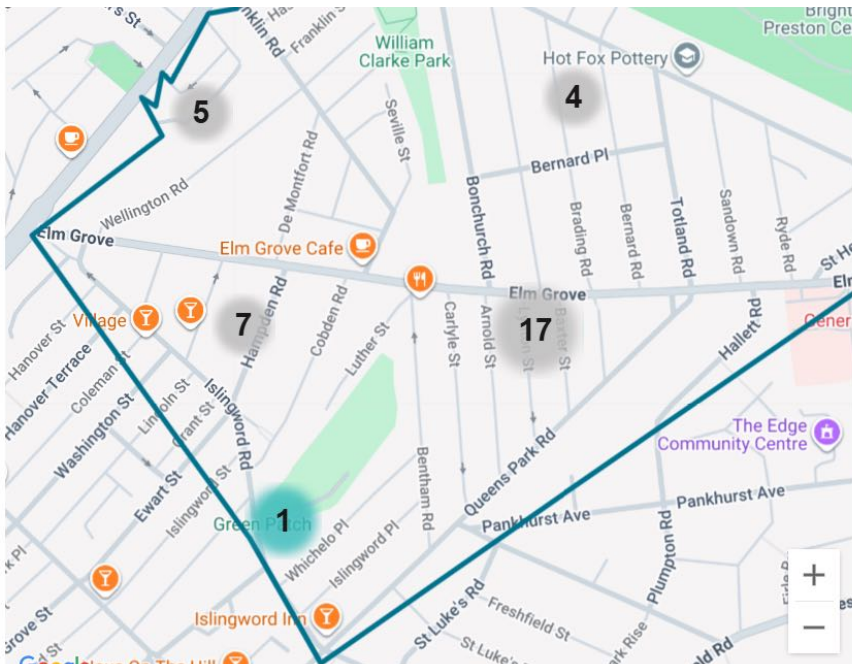
3 crimes were reported here in February 2026

Bicycle theft	1
Other theft	1
Violence and sexual offences	1

[View crime definitions](#)

[Download area crime data](#)

Image 8 – Crime Hotspot Map – February 2026 – Islingword Rd area



All Crimes (49)

January 2026

1 crimes were reported here in January 2026

Anti-social behaviour	1
-----------------------	---

[View crime definitions](#)

[Download area crime data](#)

Image 9 – Crime Hotspot Map – January 2026 – Islingword Road area



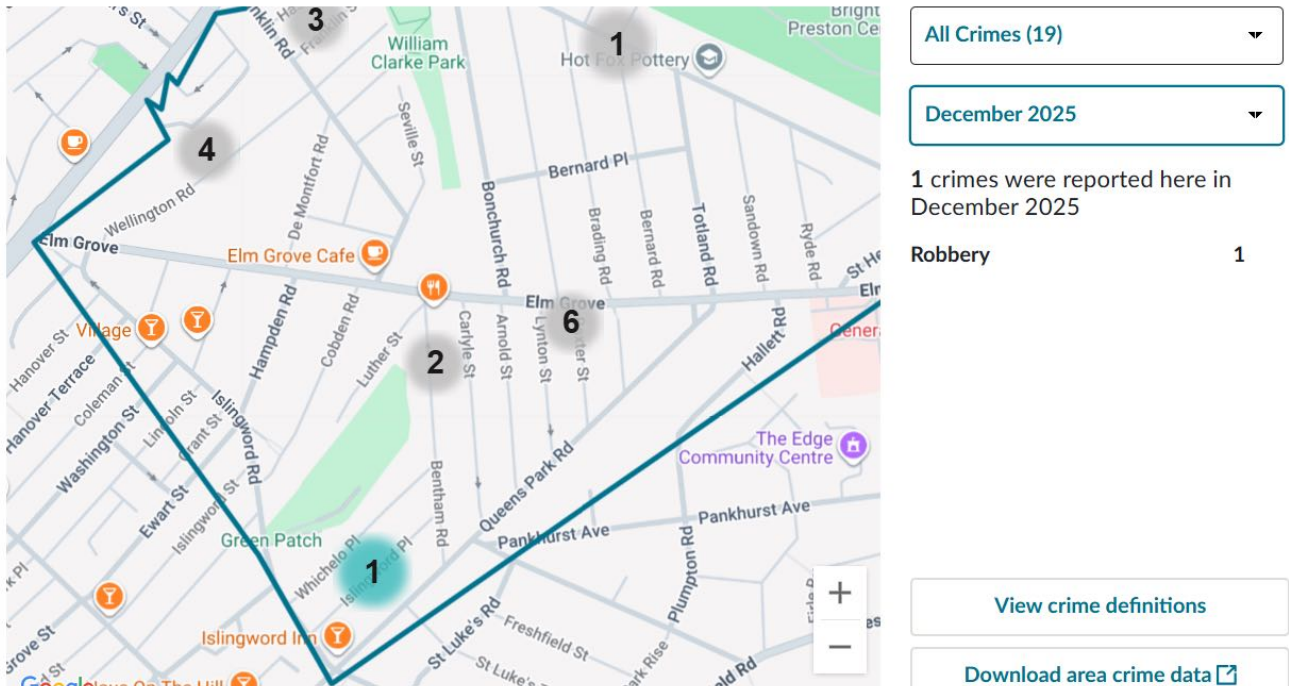


Image 10 – Crime Hotspot Map – December 2025 – Islingword Road area

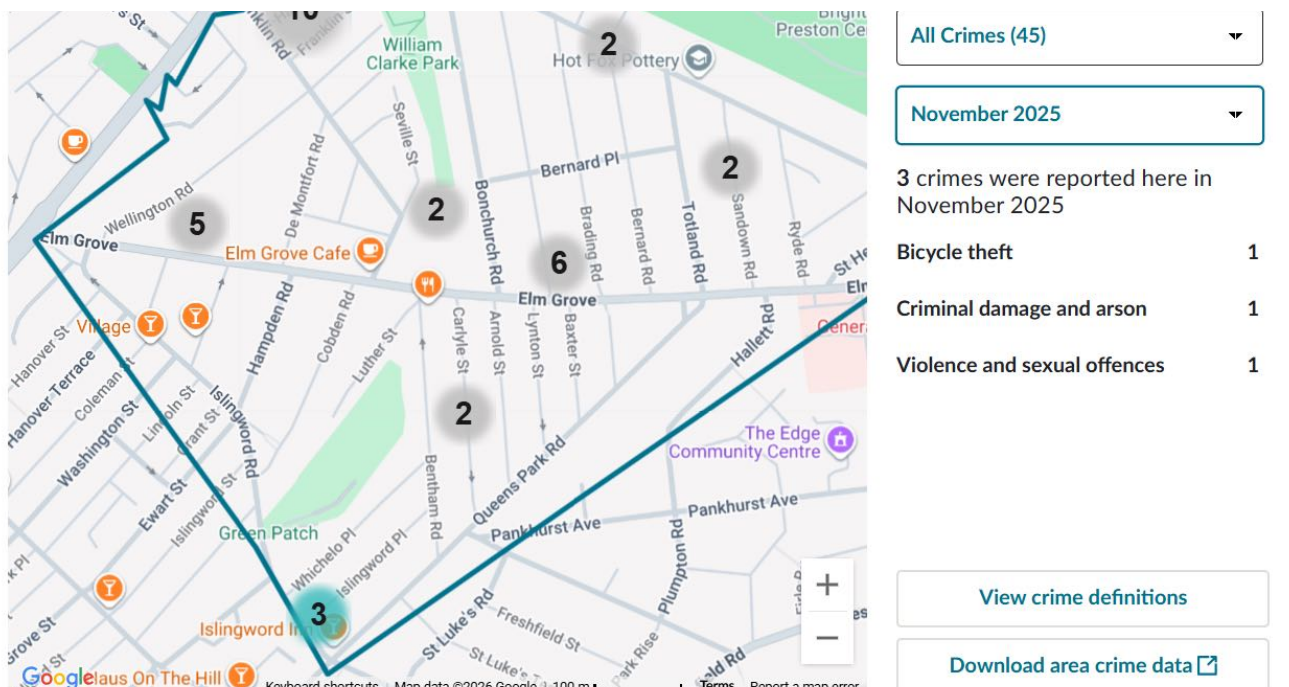


Image 11 – Crime Hotspot Map – November 2025 – Islingword Road area



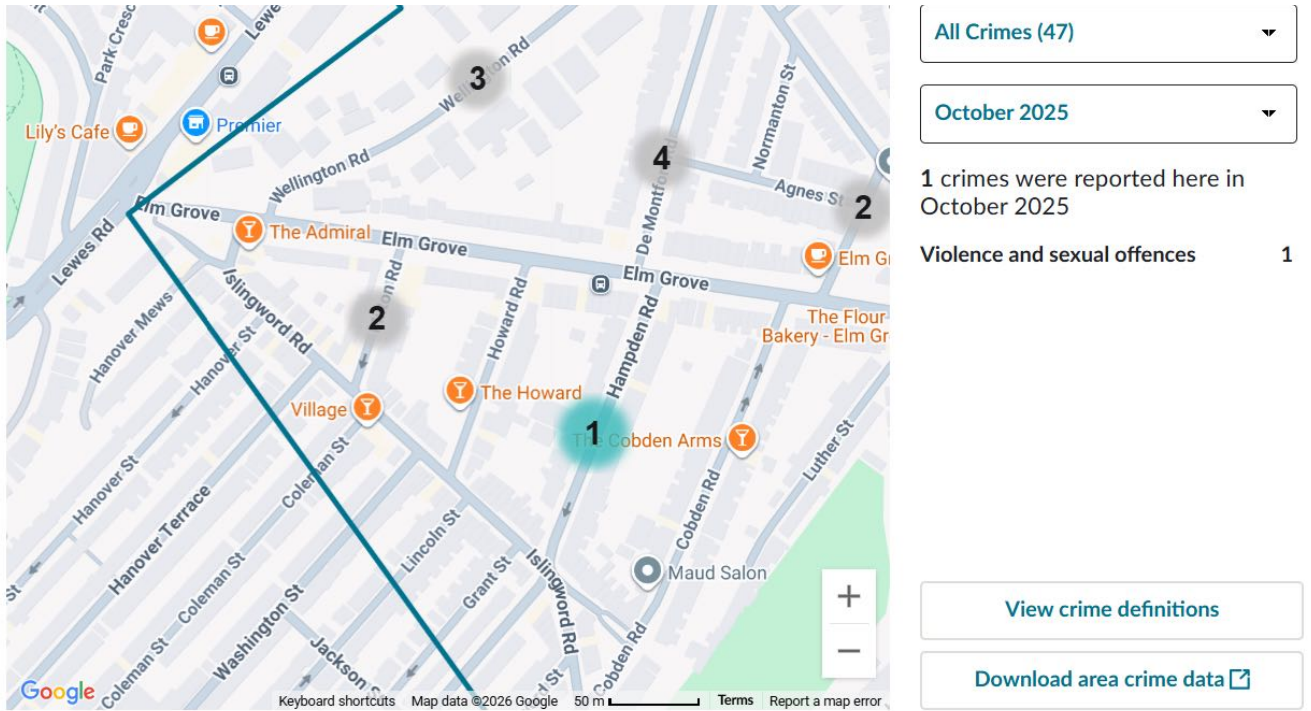


Image 12 – Crime Hotspot Map – October 2025 – Islingword Road area

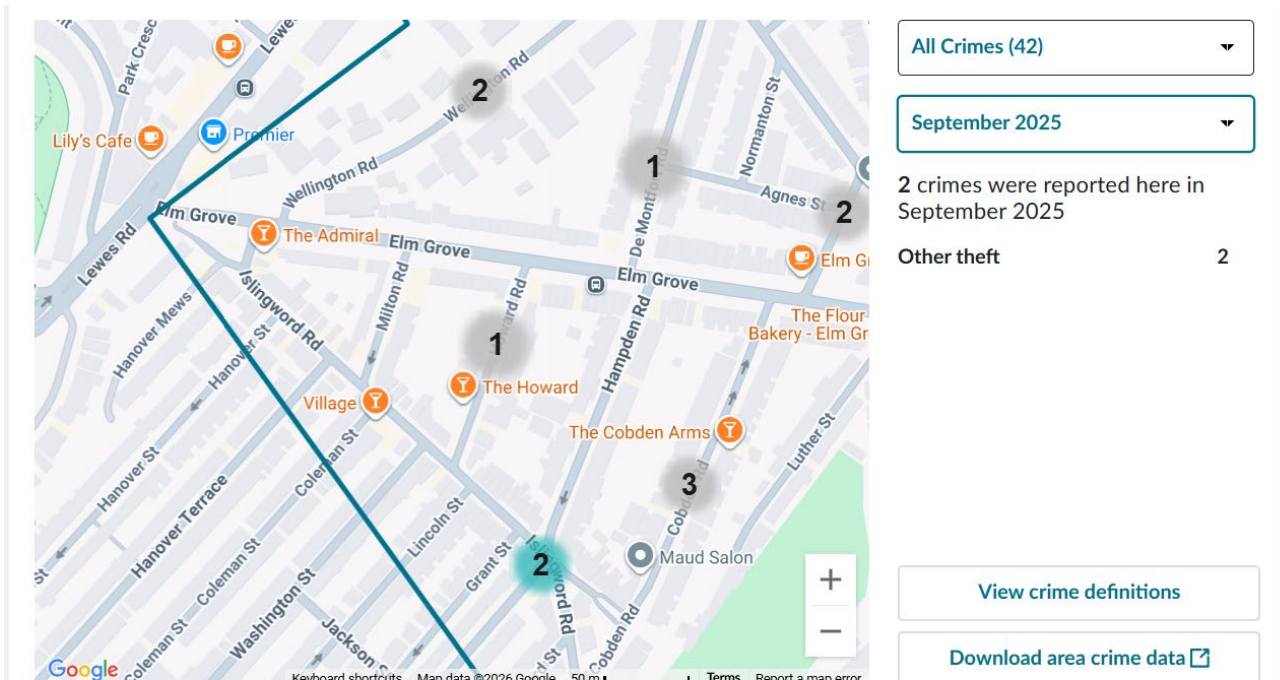
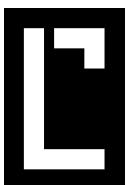


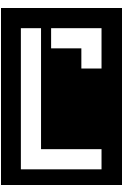
Image 13 – Crime Hotspot Map – September 2025 – Islingword Road area



## 5. CONCLUSION

- 5.1 My brief was to consider the potential impact of crime & disorder would have in the granting of a premises licence at this convenience store to sell alcohol between the hours of 0800-2300 each day.
- 5.2 Obviously I fully appreciate the position the Police and Local Authority are in with regards to the special stress area and the policy around that. There is no presumption within this policy to not grant a premises licence of this nature. Therefore we have to consider the Licensing Act 2003 and the fact all licensing decisions should be made with a full partnership approach and with fairness and proportionality. I also note the representations from a local business owner and members of the public. My belief is that one has concerns over business interests and there has been no evidence submitted by the Police or any other of the responsible authorities to support the claims from the member of the Public.
- 5.3 The Police have quoted crime figures from the entirety of the SSA. This is a large densely populated area of Brighton. There are many pubs, bars, restaurants and off licence premises contained within this area. It would be unfair to presume that every crime recorded within this stress area is as of a result of alcohol fuelled behaviours and criminality.
- 5.4 The crime figures I have produced are consistent and have been for some time. This is by volume and crime type. The Licensing Sub-Committee are considering a premises licence for the sale of alcohol by retail that is ancillary to the main purpose of this proposed business as a convenience store, grocers and small supermarket. The premises will not draw large crowds such as a bar or nightclub. In real terms from my professional and expert opinion unlikely to bring about street drinking, anti-social behaviour, crimes of violence or any form of crime spike.
- 5.5 The business owners and operators just want the opportunity to develop a business and gain a share of the local market. The business may well produce jobs which in turn support the local economy.
- 5.6 The current crime figures in the local area are relatively low. The Policing objectives support this as detailed above.
- 5.7 In my expert opinion this is a low risk premises.
- 5.8 Taking all these facts into consideration I am confident in the fact, and the Licensing Sub-Committee can be also that in the granting of this premises license the four licensing objectives will be supported. There is unlikely to be an adverse effect on the Police, other emergency services and the Local Authority.

**Richard Bunch**  
Crime & Disorder Consultant



## EXPERT'S DECLARATION (CIVIL CASES)

I Richard Bunch declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
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**E**

# Proposed Conditions



**COMPLETE  
LICENSING**

## DETAILED CONDITIONS SUGGESTED BY COMPLETE LICENSING

1. The premises will install and maintain a comprehensive CCTV system covering all parts of the premises, including area immediately outside the premises, as per the minimum requirements of the Sussex constabulary. Further:
  - a. All entry and exit points will be covered.
  - b. The CCTV system will continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises.
  - c. All recordings will be stored for a minimum period of 31 days with accurate date and time stamping.
  - d. Viewing of recordings will be made available immediately upon request of an officer of the Police or an authorised officer of the council (as defined by Section 13 of the Licensing Act 2003) throughout the preceding 31 day period, providing the request complies with the Data Protection Act 2018 or any other Primary Legislation
  - e. A staff member from the premises who is conversant with the operation of the CCTV system will always be on the premises when the premises are open and carrying on licensable activities. This staff member will be able to provide an officer of the Police or an authorised officer of the council (as defined by Section 13 of the Licensing Act 2003) copies of recent CCTV images or data with the absolute minimum of delay when requested, providing the request complies with the Data Protection Act 2018 or any other Primary Legislation.
  - f. The CCTV system will be checked each week the premises are open to confirm that it is working. Any faults shall be recorded, and if they cannot be repaired the next working day, a report will be sent to the Police.



- g. The recording equipment and data storage devices will be kept in a secure environment and fitted with security functions (such as passwords) to prevent recordings from being tampered with.
2. A log shall be kept at the premises, and made available on request to an authorised officer of the council (as defined by Section 13 of the Licensing Act 2003) or an officer of the Police, which will record the following:
- a. all crimes reported to the venue
  - b. all ejections of patrons
  - c. any complaints received concerning crime and disorder
  - d. any faults in the CCTV system or searching equipment
  - e. any refusal of the sale of alcohol
  - f. any visit by a relevant authority, Police, Ambulance Service or The Fire Brigade.
  - g. any CCTV images seized by Police or other relevant authority or supplied by license holder on request, including name of person requesting and name of person supplying
  - h. any refusal to sell alcohol
  - i. any acts of violence or criminal damage
  - j. any theft or attempted theft of alcoholic drinks
  - k. lost property

This log will be checked periodically by the Designated Premises Supervisor (DPS) this will be signed and dated, this should be done at least on a weekly basis, save as for any holiday, sickness, or other unforeseen circumstance that prevents the DPS from reasonably checking the log, in such an event the log shall be check by the DPS as soon and practically upon their return.

3. A telephone number shall be made available to be used by residents in relation to any complaint of noise resulting from the premises. The premises licence holder shall ensure that all complaints made by residents, and any action taken, are recorded within the incident log.



4. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a driving licence, passport or proof of age card with the PASS Hologram
5. The premises licence holder shall not sell alcohol to any person who appears to be intoxicated or to any person reasonably believed to be a street drinker.

Further the premises licence holder shall refuse the sale of alcohol to any person who:

- is known to the premises as engaging in street drinking; or
- has previously been involved in anti-social behaviour in the locality.

6. The premise licence holder shall ensure that staff actively monitor the area immediately outside the premises and shall refuse service to any person observed consuming alcohol in the street in the vicinity.
7. No alcohol purchased at the premises shall be consumed in any external area, including the pavement outside the premises. Staff shall actively monitor and enforce this condition.
8. A written policy on refusing sales to street drinkers shall be implemented and all staff shall be trained in its operation.
9. No single cans or bottles of beer or cider or spirit mixtures under 550ml shall be sold at the premises.
10. No super-strength beer, lagers, ciders of above 5.5% ABV (alcohol by volume) shall be sold at the premises.
11. The premises licence holder will ensure that all staff are trained commensurate with their roles at the premises. Such training shall include:
  - a. The Licensing Act 2003 and responsibilities in supporting the four licensing objectives;
  - b. Crime scene preservation.
  - c. Welfare and Vulnerability Engagement (WAVE);
  - d. Appropriate counter terrorism awareness;
  - e. Challenge 25;
  - f. Refusal of sales;
  - g. Proxy sales;
  - h Dealing with intoxicated persons.



All staff shall receive training prior to undertaking licensable duties, and refresher training shall take place at least every 6 months.

12. Training records shall be maintained at the premises, signed and dated by the member of staff and the person delivering the training, and retained for a minimum period of 12 months.
13. Such records, together with details of the training materials used, shall be made available immediately upon request to the Police or an authorised officer of the council (as defined by Section 13 of the Licensing Act 2003).
14. There shall be a personal licence holder on duty on the premises at all times when the premises is authorised to sell alcohol.
15. Alcohol shall not be sold or supplied unless paid for before or at time of sale/supply.
16. Clear legible notice will be prominently displayed reminding customers to leave quickly and quietly and have regard to the neighbours
17. The licensee will report to Trading Standards any instance of a caller attempting to sell alcohol or tobacco products within 24 hours.
18. No spirits shall be purchased in a resealed box without thorough checks being made to ensure it is legal to sell.
19. The premises licence holder shall ensure that the area immediately outside the premises, including the pavement, is regularly monitored and kept free from litter associated with the premises. Staff shall conduct checks regularly during licensable activities and remove any litter or debris.
20. All cans, bottles, or containers of alcohol sold from the premises shall be clearly marked with the name and address of the premises using a label prior to sale.



**END**



**COMPLETE  
LICENSING**

licence. The premises is The village convenience store, 28 South Street, Portslade. This is in a residential area and opens generally 7am to 11pm each day. We sell alcohol from 8am until 11pm and on Sunday 10am to 10.30pm.

8. I have a business partner for each of the premises mentioned above.
9. I understand the challenges in Brighton. The shop I operate in Brighton I am required to have 2 security on duty from 10pm until 5am on Thursday Friday and Saturday.
10. I have voluntarily stopped selling high strength alcohol based on discussions with the local authority and the police. I always try to work with the police, trading standards and licensing officers.
11. I employ 7-8 staff plus myself across my 2 shops at the moment
12. I expect to employ 3 - 4 staff plus myself if the licence is granted.
13. I live in Peacehaven and I am in Brighton every day because of my business.
14. There are no objections from local residents. There are 2 from local businesses. The representation that casts doubt on my character is not correct. I have never done anything in breach of the law or the licence and I always work hard to promote the licensing objectives.
15. The 5 references I have provided are local people to my current shops. They agreed to support me which I very much appreciate.
16. If there are any questions, I would be pleased to answer them.

The contents of this my statement are true to the best of my knowledge and belief.

Dated 28<sup>th</sup> April 2026