

Licensing Committee (Licensing Act 2003 Functions)

Date: **6 November 2025**

Time: **3.00pm**

Venue: **Council Chamber, Hove Town Hall**

Councillors: McGregor (Chair), Cattell (Deputy Chair),
Bagaeen, Czolak, Davis, Helliwell, Hewitt, Galvin, Lyons,
Nann, Parrott, Pickett, Sheard, Sykes and Thomson

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Date of Publication - Wednesday, 29 October 2025

AGENDA

Part One

Page No.

1 PROCEDURAL BUSINESS

(a) Declaration of Substitutes: Where Councillors are unable to attend a meeting, a substitute Member from the same Political Group may attend, speak and vote in their place for that meeting.

(b) Declarations of Interest:

- (a) Disclosable pecuniary interests
- (b) Any other interests required to be registered under the local code;
- (c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare

- (i) the item on the agenda the interest relates to;
- (ii) the nature of the interest; and
- (iii) whether it is a disclosable pecuniary interest or some other interest.

If unsure, Members should seek advice from the committee lawyer or administrator preferably before the meeting.

(c) Exclusion of Press and Public: To consider whether, in view of the nature of the business to be transacted, or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

NOTE: Any item appearing in Part Two of the Agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the public.

A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls.

2 MINUTES OF THE PREVIOUS MEETING

3 CHAIR'S COMMUNICATIONS

4 CALLOVER

- (a) All agenda items will be read out at the meeting and Members invited to reserve the items for consideration.
- (b) Those items not reserved will be taken as having been received

and the reports' recommendations agreed.

5 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:** to receive any petitions presented to the full council or at the meeting itself;
- (b) **Written Questions:** to receive any questions submitted by the due date of 12 noon on the 31 October 2025;
- (c) **Deputations:** to receive any deputations submitted by the due date of 12 noon on the 31 October 2025.

6 MEMBER INVOLVEMENT

To consider the following matters raised by councillors:

- (a) **Petitions:** to receive any petitions submitted to the full Council or at the meeting itself;
- (b) **Written Questions:** to consider any written questions;
- (c) **Letters:** to consider any letters;
- (d) **Notices of Motion:** to consider any Notices of Motion referred from Council or submitted directly to the Committee.

7 REVIEW OF STATEMENT OF LICENSING POLICY 2026

7 - 232

Contact Officer: Sarah Cornell
Ward Affected: All Wards

Tel: 01273 295801

8 ITEMS REFERRED FOR COUNCIL

To consider items to be submitted to the next Full Council meeting for information.

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The closing date for receipt of public questions and deputations for the next meeting is 12 noon on the fourth working day before the meeting.

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Further information

For further details and general enquiries about this meeting contact Francis Mitchell, (01273 294183, email Francis.Mitchell@brighton-hove.gov.uk) or email democratic.services@brighton-hove.gov.uk

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Brighton & Hove City Council

Licensing Committee Licensing Act 2003 Functions

Agenda Item 7

Subject: Review of Statement of Licensing Policy 2026 –
Consultation Response Report 2025.

Date of meeting: 6 November 2025

Report of: Director City Operations

Contact Officer: Name: Alex Evans
Tel: 07795 801982
Email: Alex.evans@brighton-hove.gov.uk

Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The Council, as Licensing Authority, has a statutory duty to review and publish its Statement of Licensing Policy (SoLP) every five years. The current policy took effect on 4th February 2021.. The policy should be kept under review.
- 1.2 The Council, as a licensing authority, must carry out a consultation exercise prior to any review of its Licensing Policy (Section 5(3) of the 2003 Act).
- 1.3 On 24 July 2025 the Licensing Committee authorised officers to go out to statutory consultation to review the council's Statement of Licensing Policy 2021.

2. Recommendations

- 2.1 That Committee agree the revisions to the Statement of Licensing Policy (appendix A) incorporating the main revisions as follow
 - 2.1.1 Replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA). Detailed in 3.1 of the revised Statement of Licensing Policy (SoLP)
 - 2.1.2 Retain the current Special Stress Area (SSA) and other areas. (detailed at 3.3 of the draft SoLP)
 - 2.1.3 A focus on safety as the central priority and introduction of a new set of best practice measures for the CSA and SSA which can be found in the revised Statement of Licensing Policy (SoLP) Appendix A.

- 2.1.4 Update the current Matrix approach and table to include new categories of premises including Grassroots Music Venues and changes to the hours for some types of premises which can be found at 3.4 in the revised Statement of Licensing Policy (SoLP)
- 2.1.5 Introduce a 'Good Operator Policy' which can be found at 3.5 in the revised Statement of Licensing Policy
- 2.1.6 Update nighttime economy safeguarding initiatives see section 4 of the policy. Add to the policy sections on LGBTQ+ venues and inclusivity at 1.9. Violence Against Women and Girls (VAWG), at 4.1 Modern Slavery at 1.12 and Martyn's Law at 7.1.5.
- 2.2 That the revised Statement of Licensing Policy is referred to Full Council for adoption. See Appendix A for a copy of the revised statement of licensing policy.

3. Context and background information

- 3.1 Consultation commenced on 8th August 2025 and closed on the 12th October 2025. The consultation included background information and relevant documents to the specific questions on the areas listed in the recommendations (see section 2.1) as well as a copy of the revised statement of Licensing Policy. A copy of the (Your Voice) consultation can be found in Appendix B.
- 3.2 National Guidance states at 13.4 that before determining its policy, the licensing authority must consult the persons listed in section 5(3) of the 2003 Act. These are:
 - The chief officer of police for the area
 - The fire and rescue authority for the area
 - The local authority's Director of Public Health in England
 - Persons/bodies representative of local premises licence holders
 - Persons/bodies representative of local club premises certificate holders
 - Persons/bodies representative of local personal licence holders; and
 - Persons/bodies representative of businesses and residents in its area.
- 3.3 Consultation has been undertaken with these statutory consultees and more generally via the council's on-line consultation platform Your Voice, Licensing website, the city LATs (Local Action Teams), residents associations and community associations, Business Improvement District (BID), Business Crime Reduction Partnership (BCRP), Brighton & Hove Growth Board, other Council services including Tourism, Events Office, Seafront Office (including Seafront Trader Association), Trading Standards, Legal and Finance.

4. Consultation Responses

- 4.1 It should be noted that extensive pre-consultation was carried out with relevant key stakeholders prior to going out to consultation, including Public Health, Police, Environmental Health, Highways, Culture and Environment and Licensing Committee Members. This included a Licensing Summit held on the 10th January 2025 and an informal consultation on Your Voice between the 20th January and 23rd February 2025.
- 4.2 A summary of the responses to the formal consultation are detailed below. A detailed breakdown of the on-line Your Voice consultation responses, together with the additional responses submitted by email can be found in Appendix C
- 4.3 The on-line Your Voice consultation contained specific questions relating to the proposed changes together with a question or comments on a specific area of the policy. As well the option to comment on any aspect of the policy.
- 4.4 With regard to comments on the specific questions relating to the areas of recommendation in 2.1, the comments are summarised below, but it is important that the consultation responses are considered in their entirety (please see Appendix C).

- Replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA)

Headline Results: Support total 54.3% Neither support nor oppose 17.1% Opposed total 22.9%.

- A focus on safety as the central priority and introduction of new set of best practice measures for the CSA and SSA.

Headline Results for Safety First Door Policy: Support total 81.5% Neither support nor oppose No answer, Don't Known 17.1% Opposed total 1.4%.

- Update the current Matrix approach and table to include new categories of premises including Grassroots Music Venues and changes to the hours for some types of premises.

Headline Results for grassroots music matrix category: Support total 60.1% Neither support nor oppose 11.4% Opposed total 22.8%. No answer 5.7%

- Introduce a 'Good Operator Policy'.

Headline Results: Support total 62.9% Neither support nor oppose 8.6% Opposed total 25.7%. No answer 2.8%

- Updates to the nighttime economy safeguarding initiatives and the additional sections on LGBTQ+ venues and inclusivity, Violence Against Women and Girls (VAWG), Modern Slavery and Martyn's Law

Headline Results promoting equality, diversity, and inclusion: Important 74.3% No answer 7.3% Not sure 4.3% Not important 14.1%.

- In addition to the on-line Your Voice consultation we received four emails they were from a resident, an ex councillor, Hove Civic Society and a representative of the freeholder of Churchill Square these can also be found in Appendix C.

If members were minded to agree the statement of licensing policy, Full Council alone can exercise the function of revising the authority's policy.

5 Financial & Other Implications:

5.1 Financial Implications:

The Licensing Act 2003 provides for fees to be payable to the licensing authority in respect of the discharge of their functions. The fee levels are set centrally by government. There are no revisions proposed in these recommendations to the level of fees, nor restrictions on who the licenses can be issued to. Therefore, there will not be any budgetary adjustments made in respect of this decision.

Finance Officer Consulted: David Wilder Date: 27/10/2025

6 Legal Implications:

These are set out in the report. The SoLP should follow the fundamental principles set out in the Licensing Act 2003 and statutory guidance. Following the consultation exercise, the views of all those persons or bodies should be given appropriate weight when determining the policy.

Lawyer Consulted: Rebecca Sidell Date: 27.10.25

7. Equalities implications

- 7.1 An Equality Impact Assessment (EIA) has been completed as part of the policy review process to assess if there is any adverse impact on a particular group. See Appendix D for the EIA

8. Sustainability implications

- 8.1 Licensed premises throughout the city rely on local licensing policies in ensuring there is clear guidance on the continued operation of local businesses. Maintaining a regularly reviewed policy, which has undergone public consultation, will ensure a consistency of support to licensed

premises, members of the public and other stakeholders affected by these activities.

9. Crime & disorder implications:

- 9.1 CSA proposals are geographically based around evidence of crime and disorder, etc. and should assist in the council's overall aim in reducing current levels. Special Policies promote the four licensing objectives: public safety, the prevention of crime and disorder, the prevention of public nuisance and the protection of children from harm.

10. Public health implications:

- 10.1 Public Health have been consulted as a part of this review and have produced a public health framework for assessing alcohol which can be assessed here [Public Health Framework for Assessing Alcohol Licensing | Tableau](#)

Supporting Documentation

Appendices:

Appendix A – Revised Statement of Licensing Policy

Appendix B – Consultation questions

Appendix C – Consultation responses

Appendix D - Equality Impact Assessment (EIA)

A nighttime photograph of a busy street in Brighton, showing multi-story buildings with lit windows and shopfronts, and pedestrians walking on the pavement. The image is partially covered by a large purple triangle on the left side.

Statement of Licensing Policy 2026

Licensing Act 2003

Executive Summary

This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act 2003 (the Act) and having regard to Guidance issued by the Home Office under Section 182 of the Act. The licensing authority is Brighton & Hove City Council. The purpose of this statement is to promote the licensing objectives and set out a general approach to making licensing decisions. This policy will inform the approach to be taken when deciding applications and imposing conditions when relevant representations are received.

The Policy recognises the public health role in local authorities and the legal framework for local government after the introduction of The Health and Social Care Act 2012. Local authorities are responsible amongst other things for alcohol and drug treatment and recovery services.

The city receives 10.2 million tourism day trips and 1.6 million staying visitors per year. The cultural and tourism offer in Brighton & Hove is crucial to the ongoing economic success of the city; it brings both money and jobs.

The city has high levels of cultural participation with the proportion of people that engaged with the arts from May 2023 to March 2024 was 93.80%. This is higher than the South East (92.71%) and England (90.42%). Brighton & Hove is known for its vibrant and interesting arts and creative industries which attract tourism and new businesses. The sale and consumption of alcohol contributes greatly to the city's economy and tourism.

Alcohol-related death rates in Brighton & Hove are not significantly different to the national average.

In 2023, Brighton & Hove recorded 112 alcohol- related deaths, giving an age-standardised rate of 47.3 per 100,000 population which is similar to the England average of 40.7 per 100,000

However, Brighton & Hove has higher than national average levels of adults binge drinking on their heaviest drinking day, adults drinking over 14 units per week, and dependent drinkers, according to latest available data. And the city experiences local problems such as pre- and post- loading, binge drinking, and street drinking created by cheap alcohol and fierce, localised price competition, particularly between off-licence stores and supermarkets.

The Alcohol Programme Board (APB), recently combined with the Drugs Programme Board to form the Drug and Alcohol Programme Board (DAPB), is a partnership of licensee representatives and colleagues from public health, other council teams, providers, licensing, the police, universities and voluntary sector and provides oversight to the city's public health approach to minimising the harms from alcohol.

Brighton & Hove has replaced the Cumulative Impact Zone (CIZ) with a City Safety Area (CSA) and adjacent Special Stress Area (SSA), designed to support the consideration of licensable premises in the city centre and promote good practices to minimize the adverse impact from alcohol-use. The Council have also adopted a matrix approach to decision making to encourage the right type of alcohol establishment across the city. Enforcement policies focus on reducing irresponsible promotions and underage sales.

The DAPB also supports various initiatives such as the council-led “Sensible on Strength” scheme to reduce the availability of cheap super strength beers and ciders; working with student organisations to raise the awareness of alcohol harm; and night-time economy safeguarding initiatives that protect the vulnerable and raise awareness of sexual exploitation.

Brighton & Hove City Council: Statement of Licensing Policy 2026

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Brighton & Hove City Council: Statement of Licensing Policy

1. Introduction

1.1 This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act 2003 (the Act) and having regard to Guidance issued by the Home Office under Section 182 of the Act. This policy takes effect from the Date Jan 2026. The licensing authority is Brighton & Hove City Council. The purpose of this statement is to promote the licensing objectives and set out a general approach to making licensing decisions. The discretion of the licensing authority in relation to applications under the act is only engaged if 'relevant representations' are made by other persons or responsible authorities. This policy will inform the approach to be taken when deciding applications and imposing conditions when relevant representations are received. It is also intended as a guide for applicants as to what to include in their operating schedules, always recognising that if no representations are received, the application must be granted. The licensing authority must carry out its functions with a view to promoting the licensing objectives and this policy is framed around those objectives. Each application will be given individual consideration on its merit. The scope of this policy covers the following:

- Retail sales of alcohol.
- The supply of alcohol by or on behalf of a club, or to the order of, a member of the club.
- The provision of regulated entertainment.
- The provision of late night refreshment.

1.2 The licensing objectives are:

- (a) The prevention of crime and disorder.
- (b) Public safety.
- (c) The prevention of public nuisance
- (d) The protection of children from harm.

1.3 Scope

Licensing is about regulating licensable activities on licensed premises, by qualifying clubs and at temporary events. Any conditions attached to various authorisations will be focused on matters which are within the control of individual licensees and others with relevant authorisations; i.e. the premises and its vicinity. Each application will be given individual consideration on its merit. Nothing in this policy shall undermine the right of any individual to apply under the terms of the act for a variety of permissions and to have any such application considered on its individual merits. Similarly, nothing in this policy shall override the right of any person to make representations on an application or seek a review of a licence or certificate where provision has been made for them to do so in the act.

1.4 Consultation

Before revising or determining policy for any five-year period, the licensing authority must consult:

- (a) the chief officer of police for the licensing authority's area;
- (b) the fire and rescue authority for that area;
- (c) the Director of Public Health
- (d) such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority;
- (e) such persons as the licensing authority considers to be representative of holders of club premises certificates issued by the authority;
- (f) such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority; and
- (g) such other persons as the licensing authority considers to be representative of businesses and residents in its area.

1.4.1 In relation to this, its sixth statement of licensing policy, the licensing authority has also chosen to consult the following persons or bodies:

- South East Coast Ambulance Service
- Accident & Emergency Services
- Brighton & Hove Bus and Coach Company
- Taxi Forum
- The council's Transport Planning, Planning Policy, Community Safety, Tourism, Drug & Alcohol Awareness and Economic Development departments
- Ward Councillors
- Individual premises and personal licence holders and club premises certificate holders
- Residents' Associations
- Generally via the licensing pages of the council's website and also via the council's Your Voice Consultation Portal.
- Brighton & Hove Economic Partnership, Business Improvement District (BID).
- Business Crime Reduction Partnership (BCRP)
- The City's Universities
- Drug and Alcohol Programme Board.

Appropriate weight was given to the views of all of those who responded. This policy is subject to Guidance and Regulations issued by the government including any issued after the date of publication of this statement.

1.5 Partnership

- 1.5.1 The Policy recognises the public health role in local authorities and the legal framework for local government after the introduction of The Health and Social Care Act 2012. Local authorities are responsible amongst other things for commissioning drug and alcohol treatment and recovery services.
- 1.5.2 Local leadership for public health is at the heart of the 2012 Health and Social Care Act. Unitary authorities have responsibilities to reduce inequalities and improve the health of their populations, backed by a ring-fenced grant and a specialist public health team, led by the Director of Public Health. Unitary authorities are supported in this by the expertise within Environmental Health, Trading Standards and Licensing.
- 1.5.3 Local authorities should embed public health functions into all their activities including its duty as licensing authority, tailoring local solutions to local problems, and using all the levers at their disposal to improve health and reduce inequalities. They will create a 21st century local public health system, based on localism, democratic accountability and evidence.
- 1.5.4 Supporting local political leadership in improving health is the duty of the director of public health and their team. The Director of Public Health is the lead officer in the local authority for health, and a statutory chief officer. The Licensing Manager will act as principal licensing officer.
- 1.5.5 Public Health champion health across the whole of the authority's business, promoting healthier lifestyles to promote better health and ensure threats to health are addressed.
- 1.5.6 The policy recognises the need to balance economic prosperity with community protection. Good regulation at a local level provides fair trading conditions. This creates a fair trading environment, discourages irresponsible practices and promotes community well-being. Local regulation is attuned to supporting the local economy and local businesses. Partnership between responsible authorities reduces conflict between agencies and targets resources.
- 1.5.7 The licensing authority encourages partnership working with other authorities and agencies. The Business Crime Reduction Partnership (BCRP), Security Industry Authority (SIA) briefing and similar schemes, will be encouraged for instance with Home Office approval to share information and facilitate exclusion of troublemakers.

1.6 Local features

- 1.6.1 We recognise that two of Brighton & Hove's biggest economic contributors are the creative and visitor economies. The city's credentials as a leading creative destination is one that supports, celebrates and promotes the city's unrivalled history, heritage and world-class arts and culture, its booming creative industries, its position as a leading centre for conferencing and major events, and its outstanding restaurants, cafes, hotels, pubs, and bars to UK and global visitors.
- 1.6.2 The local visitor economy is characterised by three sectors: conferences, leisure and English language education. In 2023, Brighton & Hove welcomed 11.8 million visitors, of which 1.6 million stayed overnight. The visitor economy was worth £902m in economic benefit and supported more than 23,742 jobs in the city, which equates to 16% of all employee jobs in Brighton & Hove. With induced and indirect spend the total value of tourism was worth £1.28bn in 2023 (Economic Impact Assessment of Tourism, 2023). The economic impact estimates demonstrate that Brighton & Hove is getting close to a return to pre-pandemic levels of visitor volume and value.

1.7 Culture and Tourism

- 1.7.1 Licensing policy supports entrepreneurial activity, promoting the city's businesses, supporting growth in the creative industries sector, extending the business improvement district and enabling a vibrant nighttime economy. The cultural and tourism offer in Brighton & Hove is crucial to the ongoing economic success of the city, bringing both money and jobs. This range of work also provides solutions to some of the problems of inequality in the city.

1.8 Culture and Creative Industries

- 1.8.1 The Culture and Creative Industries sector encompasses 10% of jobs and 21% of business in Brighton & Hove. This represented 642m in gross value added (GVA) for the city in 2021. A 2019 study from the University of Sussex highlighted that the sector generated more than £1.5 billion in annual turnover in the city.
- 1.8.2 A vibrant and inclusive cultural and creative scene supports our nighttime economy, which licensing policy is central to. The live music scene is one of the city's great success stories, with around 80 different live music events happening each week and generating an estimated £112m for the local economy. We support the Music Venues Alliance Brighton to represent grassroots music venues, recognising that they are particularly vulnerable to increasing commercial and regulatory pressures.
- 1.8.3 The city currently hosts around 60 festivals each year, including the Brighton Festival (the largest curated arts festival in England), Brighton Fringe, On the Beach and The Great Escape. Festivals contribute over £20 million annually to the city's economy.

1.9 Enhanced LGBTQ+ and Inclusion Standards for Licensed Venues

1.9.1 Policy Commitment - Brighton and Hove City Council is unequivocally committed to fostering Inclusive Communities through our council plan. This commitment necessitates comprehensive equality and inclusion frameworks across all council functions, with attention to our licensing responsibilities. Our objective is to measurably enhance quality of life and accessible opportunities for all residents, workers, and visitors, with specific recognition of the historical and ongoing challenges faced by our LGBTQ+ and TNBI (Trans, Non-Binary, and Intersex) communities.

As licensing authority for one of the South East's highest concentrations of licensed venues, we recognise our responsibility to protect vulnerable communities from discrimination while fostering economic vitality and cultural vibrancy.

1.9.2 Operational Standards for Licensed Venues - All licensed venues should meet the following minimum standards:

- **Policy Transparency:** Admission and service policies should be documented, publicly accessible, and demonstrably non-discriminatory. While reasonable conditions may apply (dress codes, intoxication restrictions), policies should explicitly prohibit exclusion based on gender expression, gender identity, sexual orientation, perceived sexuality, or other protected characteristics.
- **Staff Training:** All customer-facing personnel should complete training on equality obligations and inclusive service delivery, including LGBTQ+ terminology, pronoun usage, and incident response protocols. Training records should be maintained for inspection.
- **Complaints procedures:** Venues should implement accessible reporting mechanisms for discrimination experiences, with staff trained to address incidents of transphobia, homophobia, and biphobia.
- **Physical Accessibility:** Where structurally feasible, venues should provide gender-neutral facilities and conduct access audits addressing barriers faced by disabled LGBTQ+ individuals.

This framework serves as both a commitment to our diverse communities and an accountability mechanism for measuring progress toward genuine inclusion within Brighton and Hove's licensed venues.

1.10 Environmental Considerations

Encourage and promote the reduction of street litter and other forms of waste from licensed premises in line with our goal to deliver an accessible, clean, and sustainable environment that we can all be proud of.

1.11 The Planning Context

- 1.11.1 Planning, building control and licensing will be properly separated to avoid duplication and inefficiency. Granting of licences will not relieve applicants of the need to apply for planning permission or building control consent and there is an expectation that these issues will have been explored before licensing applications are submitted. Applicants are recommended to obtain correct planning consents prior to applying for a licence to avoid potentially inoperative licences.
- 1.11.2 Where appropriate, matters for consideration in licensing applications will not duplicate matters considered as part of any planning application. Licensing decisions will consider any relevant planning decisions either by the Planning Committee, planning officers or following appeals against decisions taken by that committee and will not normally cut across such decisions.
- 1.11.3 Where appropriate, when considering planning applications within the above policy framework, planning conditions can be attached to permissions to safeguard amenity and mitigate against cumulative impact.

1.12 Modern Slavery

- 1.12.1 The Modern Slavery Act 2015 covers offences where a person

- (a) holds someone in slavery, servitude or compulsory labour
- (b) arranges or facilitates the travel of another for the purposes of exploitation (human trafficking).

Section 52 of the 2015 Act imposes a statutory duty on Brighton & Hove City Council as a “first responder” agency - to notify the Home Office if we believe someone has been a victim of slavery, servitude, compulsory labour or human trafficking. The Council has an internal pathway so that potential victims who are identified can be engaged with by trained officers from the most appropriate service, depending on the age and needs.

- 1.12.2 Business owners of licensed premises can be perpetrators of exploitation, by subjecting employees to conditions that amount to offences under the Modern Slavery Act. This can occur (but not limited to) where the individuals do not have the legal right to work in the UK and are required to work outside of the employment protections of UK law and for less money than the statutory minimum wage.

1.12.3 Licensed premises might be unwitting hosts to modern slavery by allowing exploiters or traffickers to use the licensed establishment as a venue.

1.12.4 The Licensing Authority should have an understanding of the Modern Slavery Act and of the indicators of modern slavery and human trafficking, as well as an awareness of how to report concerns internally within Brighton & Hove City Council and law enforcement, where necessary.

1.13 Human Rights

1.13.1 The Human Rights Act 1998 incorporates the European Convention on Human Rights and makes it unlawful for a local authority to act in a way that is incompatible with a Convention right. The licensing authority will have particular regard to the following relevant provisions of the European Convention on Human Rights: -

- Article 6 that in the determination of civil rights and obligations everyone is entitled to a fair and public hearing within a reasonable time by an independent and impartial tribunal established by law.
- Article 8 that everyone has the right to respect for private and family life and his home.
- Article 1 of the First Protocol that everyone is entitled to the peaceful enjoyment of his possessions (including for example possession of a licence).

1.14 Delegations

For convenience, the national scheme of delegation for determinations is set out below.

Matter to be dealt with	Full Licensing Committee	Sub-committee	Officers
Application for personal licence		If a police objection	If no objection made
Application for personal licence with unspent convictions		If a police objection	If no objection made
Application for premises licence/club premises certificate	If discretion engaged for major applications	If a relevant representation made	If no relevant representation made
Application for provisional statement		If a relevant representation made	If no relevant representation made

Application to vary premises licence/club premises certificate		If a relevant representation made	If no relevant representation made
Application to vary designated premises supervisor		If a police objection	All other cases
Request to be removed as designated personal licence holder			All cases

Application for transfer of premises licence		If a police objection	All other cases
Application for interim authorities		If a police objection	All other cases
Application to review premises licence/club premises certificate		All cases	
Decision on whether a complaint is irrelevant, frivolous, vexatious, etc.			All cases
Decision to object when local authority is a consultee and not the relevant authority considering the application			All cases
Determination of a police/EHA objection to a temporary event notice		All cases	
Policy decisions	All cases		
Decision whether to consult other responsible authorities on minor variation application			All cases
Determination of minor variation application			All cases

1.14.1 The professional development and competence of licensing councillors will be provided and maintained to support the need to act as a professional licensing authority, meeting lawful standards of good administrative decision making.

2. Public Health and Alcohol

2.1 Public Health Perspective

- 2.1.1 Where a local authority's Director of Public Health (DPH) exercises its functions as a responsible authority, it should have sufficient knowledge of the licensing policy and health issues to ensure it is able to fulfil those functions. If the authority wishes to make representations, the DPH will decide how best to gather and coordinate evidence from other bodies which exercise health functions in the area, such as emergency departments and ambulance services. Health bodies may hold information which other responsible authorities do not, but which would assist a licensing authority in exercising its functions. This information may be used by the health body to make representations in its own right or to support representations by other responsible authorities, such as the police. Such representations can potentially be made on the grounds of all four licensing objectives.
- 2.1.2 NHS England, the Department of Health and Social Care (DHSC) ¹ and the Local Government Association recognise that the Statement of Licensing Policy provides an important opportunity to incorporate relevant local public health concerns, within the wider policy context of the local licensing authority and that as a responsible authority, the DPH has a key role in identifying and interpreting health data and evidence. Although there have been improvements in some alcohol related health issues, alcohol still has a significant impact on the health and wellbeing of local people. The Statement of Licensing Policy operates in this context and decisions about licensing need to be taken to protect the local population, including families and children, from the many harms that alcohol can cause.
- 2.1.3 In 2023/24 there were 3,366 hospital-admission episodes for a broad definition of alcohol-related conditions in Brighton & Hove, a rate of 1,367 per 100,000 population which is below the England rate of 1,824 per 100,000 population. For alcohol-specific conditions, Brighton & Hove saw 1,518 episodes (which equates to a rate of 579 per 100,000), now lower than the national rate of 612 per 100,000 population. Both indicators are now significantly better than the England average and for the last six years, the local rate has been below the rate for England.
- 2.1.4 Central Brighton and particularly the West Street area has been identified as a violent crime hotspot. Through effective coordination of relevant strategies and policy areas (e.g. licensing, policing and public safety), the council will seek to improve safety by encouraging a more balanced range of complementary evening and night-time economy uses which appeal to a wide range of age and social groups and managing existing late night uses within identified parts of central Brighton. Local work to reduce violent crime is coordinated through the Local

Public Service Agreement / Violent Crime Action Plan. In addition, a 'City Safety Area' within central Brighton has been adopted by the Council and grants greater powers to control the number of licensed premises in the city centre.

2.1.5 Brighton & Hove scores significantly worse than the England average for the following indicators that profile alcohol related harm:

- Alcohol specific hospital admissions for under 18s: Brighton and Hove is at the worst end of the local- authority range.
- Potential years of life lost due to alcohol-related conditions (Male)

Source: [Fingertips: Local Alcohol Profile](#)

Brighton & Hove also has higher than national average levels of adults binge drinking on their heaviest drinking day, adults drinking over 14 units per week, and dependent drinkers, according to latest available data.

2.1.6 Alcohol consumption data:

Brighton & Hove's percentage of adult's binge- drinking on their heaviest drinking day for the 2020–22 rolling period is:

- 16.8 % (England average 14.8 %)

Dependent drinkers

The "Possible alcohol dependence (AUDIT)" indicator was introduced in February 2025, however, is only published at the England and regional level, not for individual local authorities.

England (2022): 0.6 % of adults are classed as having possible alcohol dependence (AUDIT) [Fingertips](#).

- Brighton & Hove: this indicator is not available at local- authority level. See Health Counts data for 2024 below.

The Health Counts survey 2024 showed 44% of adult Brighton and Hove respondents drink at increasing risk (28%), higher risk (14%) or possible dependence levels (2%). The questions were different to those asked in 2012, so no local trend data is available. Of adult respondents to Health Counts, 16% reported binge drinking weekly and 2% daily or almost daily.

2.1.7 A report entitled 'Public Health Framework for Assessing Alcohol Licensing' is produced by the Public Health Intelligence team. It contains ward by ward analysis of crime and disorder data and health data and as such is a valuable tool in assessing the potential impact of new licences within a community. The Director of Public Health may use this information to inform a representation relating to an individual

application. This document is available here can be found here [Public Health Framework for Assessing Alcohol Licensing | Tableau Public](#).

- 2.1.8 Since 1st April 2020 the drug and alcohol treatment and recovery service for Brighton and Hove has been provided by Change, Grow, Live (CGL). CGL is a large health and social care charity successfully providing drug and alcohol services in many areas across the UK including East and West Sussex. The recovery service is delivered by an integrated team of doctors, nurses, psychiatrists, recovery coordinators, recovery champions, peer mentors, community outreach and volunteers. Some aspects of the service are subcontracted to community pharmacy and local specialist voluntary sector partners, The Oasis Project and Cascade Creative Recovery. The service works collaboratively with a range of NHS and voluntary sector partners across the city to improve outcomes for those affected by drugs or alcohol.

2.2 The Drug and Alcohol Programme Board and Sensible on Strength Campaign

- 2.2.1 The Alcohol Programme Board (APB), which has now merged with the Drugs Programme Board to become the Drug and Alcohol Programme Board, includes health commissioners and NHS/voluntary sector providers, the Council, University student reps, police, licensees, retailers and probation services. The Boards, current and previous, monitor and review interventions associated with the availability of alcohol, in particular, local problems such as pre-loading, binge drinking and street drinking. These are often exacerbated by the availability of cheap alcohol and fierce, localised price competition, particularly between off-licence stores and supermarkets.
- 2.2.2 Over recent years problems associated with street drinking have been experienced across the city but particularly in New Road. There are many support services in place to deal with this and the drinkers themselves, including outreach services. In addition there are multiple campaigns that support the reduction of availability of high strength alcohol and help target problem drinking.
- 2.2.3 In November 2013 the Licensing Authority launched the 'Sensible on Strength' scheme to reduce the availability of cheap super-strength beers, lagers and ciders. Off licences voluntarily sign up not to sell cheap super-strength beers, lagers and ciders over 6% ABV and operate good practice measures (see 3.8.3), for which they receive an accreditation as a responsible retailer. This has been a considerable success and we have received positive feedback including from businesses, alcohol treatment centres and health professionals. This is an ongoing scheme that is regularly reviewed.

2.2.4 The ultimate aim of such campaigns is to reduce alcohol related harm and anti-social behaviour, and to encourage lower strength alcohol use. Evidence shows that in moving to lower strength alcohol, the level of deterioration in health is slowed and there is more likelihood that people using alcohol will move to less harmful drinking. Public health is not a licensing objective but reducing high alcohol by volume drinks from the off licence trade should benefit alcohol related morbidity and mortality and associated harms such as anti-social behaviour ASB.

2.2.5 Other campaigns include:

Local Alcohol Awareness Week Activation

Each July, Brighton & Hove City Council and Change Grow Live, host information stalls at Hove Town Hall, libraries, surgeries and community centres to raise awareness of alcohol harm, share resources and signpost to treatment services. [Brighton & Hove City Council](#)

2.2.6 Additionally, at national level, **Dry January** and **Alcohol Awareness Week** is led by Alcohol Change UK and remain high-profile, with free toolkits for workplaces and communities to run their own events and challenges. [alcoholchange.org.uk](#)

3. Special Policies and Initiatives

3.1 City Centre Safety Policy.

3.1.1 This special policy replaces the previous special policy on cumulative impact which has been a feature of the SoLP since 2008. It will refer to a City Safety Area (CSA), a detailed plan of which is shown below.

3.1.2 The CSA has the same borders as the previous Cumulative Impact Zone (CIZ). The CSA continues to be an area of special concern to the licensing authority because of the high levels of crime and disorder and nuisance experienced within it. This is evidenced by the police data which is attached at Appendix E of this policy.

3.1.3 The existing Special Stress Area (SSA) will remain the same.

3.2 Focus on safety as the central priority.

3.2.1 After careful consideration the Licensing Authority has decided to re-designate the area formerly covered by the CIZ as a CSA in order to make safety the overriding focus and priority in and around licensed venues. In doing so the Licensing Authority's objective is to maximise protection for everyone participating in the night-time economy, particularly people visiting, working and living in the city centre. It is recognised that cumulative impact continues to be a feature of the CSA but by careful scrutiny of licence applications and mandating robust safety policies the Licensing Authority's aim is to improve safety by reducing levels of crime, disorder and public nuisance (and their associated harms) and so promote the licensing

objectives within the CSA. Through this revised approach, the Licensing Authority will seek to promote a diverse range of venues within the city centre, recognising the importance of diversity to the safe and efficient functioning of this area and its night time economy.

3.2.2 This special policy is underpinned by two key elements.

3.2.3 Firstly, although no longer subject to a blanket presumption of refusal, all applications within the CSA will be scrutinised against the new Matrix Approach (set out at 3.4 of the policy) meaning that applications which do not comply with the Matrix are likely to be refused (and the Licensing Authority acting as a responsible authority will generally make relevant representations objecting to the grant of a licence in these circumstances). As explained further below, the Matrix Approach will not be applied inflexibly but the Licensing Authority will only depart from it in exceptional circumstances.

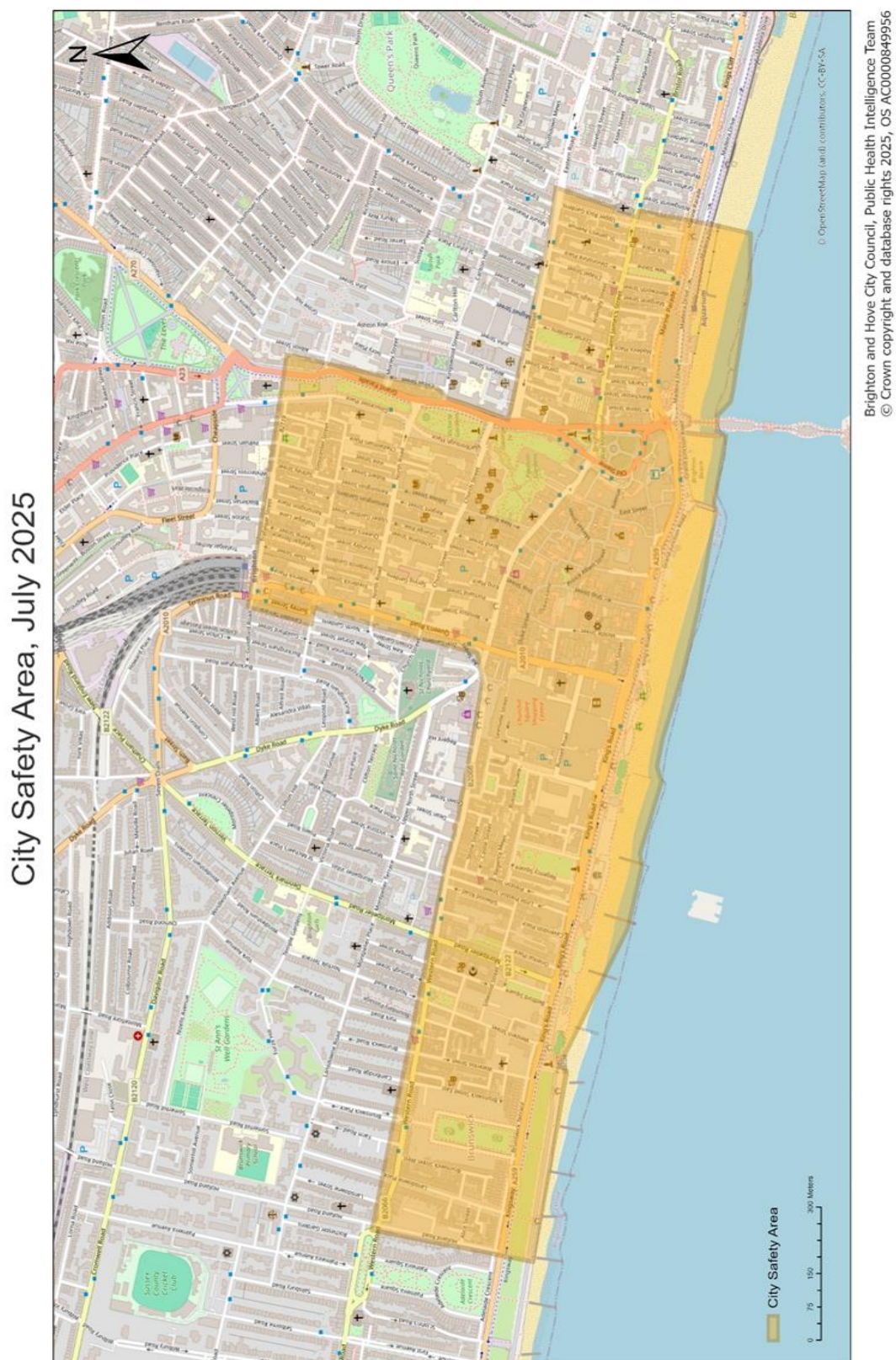
3.2.4 Secondly, applications within the CSA will be expected to include in the proposed operating schedule robust additional measures (as appropriate to the nature and location of the venue) which are set out in appendix A. These best practice measures place a special emphasis on safety, including measures to tackle drink spiking, unwanted sexual behaviour and the use of ID scanners. Before making an application within the CSA, applicants are expected to consult with the responsible authorities and seek advice on which measures are appropriate to include in the proposed operating schedule. Applicants should also be aware that the Licensing Authority will likely refuse applications within the CSA which do not comply with the Matrix Approach even where appropriate measures drawn from the appendix have been proposed: of itself, satisfying the requirements of the appendix will not be considered exceptional circumstances capable of justifying a departure from the Matrix.

3.2.5 The Role of Cumulative Impact

3.2.6 Cumulative impact remains a significant concern due to the high concentration of licensed premises within the CSA. This is evident from the police data at Appendix E. However, it is recognised that the degree of impact is likely to vary for different premises depending on their business model and other characteristics. For example a large nightclub or public house is likely to add to problems of cumulative impact, but a theatre, or live music venue – where consumption of alcohol is not the primary activity – is less likely to have a similar degree of impact. This risk based approach along with the objective of encouraging a diversity of venues has formed the basis for our new Matrix Approach below.

3.2.7 All applications will be considered on their own merits. The Matrix Approach sets out the Licensing Authority's preferred approach, but this does not mean that applications which comply with the Matrix will always be granted. It is expected that responsible authorities or other persons will continue to make representations based on cumulative impact in appropriate cases and therefore the Licensing Authority may in its discretion refuse an application on grounds of cumulative impact notwithstanding that it otherwise complies with the Matrix Approach.

3.2.8 A detailed plan of the CSA is shown below:



3.2.9 - side of Western Road, Brighton from its intersection with the west side of Holland Road to the junction with the west side of Dyke Road at its eastern end; from there, north-

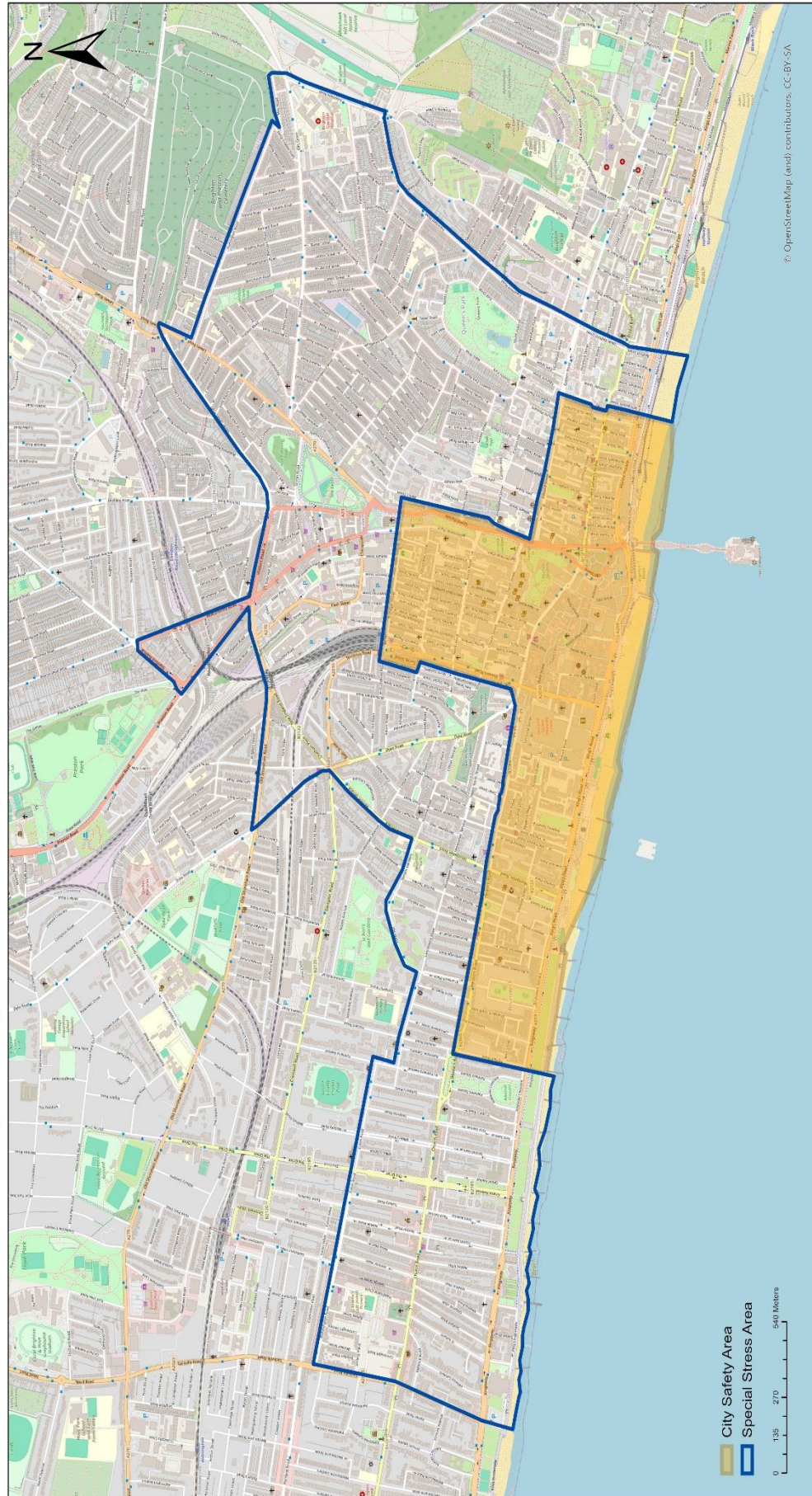
east to the junction of the north side of Air Street with the westside of Queens Road and then northward to the north-west corner of Surrey Street junction with Queens Road; thence along the north side of Trafalgar Street eastwards to its junction with York Place and continuing south-east across to Grand Parade, then south to the junction of Edward Street; along the north side of Edward Street to the east side of its junction with Egremont Place and southward along the eastern sides of Upper Rock Gardens and Lower Rock Gardens; southward to the mean water mark and following the mean water line westward to a point due south of the west boundary of Holland Road; northward to that point and along the west side of Holland Road to its northwest boundary and then diagonally across Western Road to its intersection with the west side of Holland Road.

3.3 Special Stress Area

Since March 2008, the licensing authority has kept the Special Stress Area (SSA) under review which included in Nov 2018, expanding the SSA into Central Hove and in Nov 2020 it was expanded further into Preston Road and Beaconsfield Road.

- 3.3.1 The map below details the area of the city centre which borders the City Safety Area and which is deemed an area of special concern in terms of the levels of crime and disorder and public nuisance experienced within it. The area recommended for further monitoring and detailed guidance within the Special Policy comprise the following as pictured below delineated in blue.

City Safety Area and Special Stress Area, July 2025



Brighton and Hove City Council, Public Health Intelligence Team
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The Special Stress Area - an area bounded by and including: The west side of Hove Street/Sackville Road, northwards to the intersection with the north side of Blatchington Road, along north side of Blatchington Road and Eaton Road, southwards at the junction onto the east side of Palmeira Avenue and then eastwards at the junction onto the north side of Landsdowne Road; eastwards to the junction with Furze Hill, along the north side Furze Hill to its end and then due east along the north side of Victoria Road to its junction with Montpelier Road (west side), north to where Montpelier Road joins Vernon Terrace then north to Seven Dials; north west along the west side of Dyke Road until the junction with the Old Shoreham Road, then East along the north side of Old Shoreham Road, continuing on the north end of New England Road, north west at Preston Circus at the junction of New England Road and Preston Road along the west side of Preston Road until the junction with Stanford Avenue then and north east along the north side of Stanford Avenue until the junction with Beaconsfield Road, south along the east side of Beaconsfield Road until the junction at Preston Circus and Viaduct Road, eastwards along the north side of Viaduct Road, then at the junction with Ditchling Road, North East along the north side of Upper Lewes Road until the junction with Lewes Road; south along the Lewes Road to junction with Hartington Road, along the north side of Hartington Road until the junction with St. Helen's Road, south into the north side of May Road, eastwards until its junction with Freshfield Road (east side), then south into Upper Bedford Street, into Bedford Street to the mean water mark south of Bedford Street, then due west until the mean water mark south of Lower Rock Gardens; North on Upper Rock gardens, to the north side of Eastern Road, west along Eastern Road and Edward Street until Grand Parade, north along the Eastern side of Grand Parade to the junction of York Place and Trafalgar Street, West along the Northern boundary of Trafalgar Street, up to and including Surrey Street and then South along the Western boundary of Queens Road to the junction with Air Street, West along the north side of Air Street, South-west to the junction of Western Road Brighton, then West along the North side of Western Road Brighton, South along the West side of Holland Road to the mean water mark south of Kingsway and Kingsway Esplanade as far as the west side of Hove Street/ Sackville Road.

- 3.3.2 This 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. The area will be kept under review.
- 3.3.3 New and varied applications for premises and club premises certificates within the SSA will not be subject to the presumption of refusal, but operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas. Appendix A of the SoLP sets out a list of potential measures the licensing authority considers may be appropriate. These may be more or less appropriate depending upon the style of operation applied for.
- 3.3.4 On receipt of any application in the SSA, where a relevant representation has been made, the licensing authority will scrutinise the application carefully and will look at the measures proposed in the operating schedules and compare them to the measures set out in Appendix A, Licensing Best Practice Measures. Where discretion has been engaged, those applications which fall short may be refused or conditions applied to comply with policy measures.
- 3.3.5 The Licensing Authority will keep the City Safety Area and Special Stress Area under review. Should the authority find that problems of crime and disorder or nuisance are not improving, or are worsening, the Special Policy will be reviewed.

3.4 The Matrix Approach **The Licensing Authority will support:**

- 3.4.1 Diversity of premises: ensures that there is a mix of the different types of licensed premises and attracts a more diverse range of customers from different age groups, different communities and with different attitudes to alcohol consumption. It gives potential for positively changing the ambience of the city or an area of it. This will have a positive effect in reducing people's fear of crime and in increasing the number of evening visitors to the city centre. The Community Safety Strategy recognises that too many single uses in a confined area and patrons turning out onto the streets at the same time may create opportunities for violent crime and public disorder and therefore supports: mixed use venues encouraging a wider age balance.
- 3.4.2 A 'Matrix' approach to licensing decisions has been adopted and is set out below. It provides a firm framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success or otherwise to investors and businesses making applications. It underpins the City Centre Safety Policy (see above at 3.1).

Matrix approach for licensing decisions in a Statement of Licensing Policy (times relates to licensable activities)

	City Safety Area	Special Stress Area	Other Areas
Food & dining venues	1 am	1 am	1 am
Fast food premises	No	Midnight Deliveries until 2am	Midnight Deliveries until 2am
Cafe	10pm	10pm	10pm
Performance venues	Midnight	Midnight	Midnight
Grassroots Music venues	Midnight	1am	1am
Nightclubs	No	No	No
Public houses and bars	No	Midnight	Midnight
Non-alcohol led venues	Midnight	Midnight	Midnight
Off licences	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note below)
Shared workplaces, co-working offices	Midnight	Midnight	Midnight
Members' clubs	11pm	Midnight	Midnight

3.4.3 Explanatory notes on matrix

Definitions: [each venue will be considered individually, and the below definitions may need to be applied flexibly depending on the business model of the specific venue]

Food and dining venues	<ul style="list-style-type: none"> • Provide substantial table meals to customers dining at the premises • Food is prepared on site • Alcohol is sold to customers ancillary to a substantial table meal for consumption at the premises (or in an associated outdoor dining area) only • If takeaway service is provided, must be ancillary to provision of substantial table meals
Fast food premises	<ul style="list-style-type: none"> • Provide late night refreshment of fast food intended for immediate consumption on the premises or takeaway • Food is served in disposable packaging
Cafes	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises in addition to other food and drink products • Food and drink is served to customers seated at a table including to any outdoor designated area • Food is prepared on site and the premises will have a fully operational kitchen • A full menu of the hot and cold food items available will be clearly on display within the premises.

	<ul style="list-style-type: none"> • Generally operate in the daytime and early evening only.
Performance venues	<ul style="list-style-type: none"> • Provide performances of live music, theatre, dance and other creative arts to entertain an audience • Includes live music venues, concert venues, cabarets and theatres • Does not include karaoke or Grassroots Music Venues
Grassroots Music Venues	<ul style="list-style-type: none"> • Grassroots Music Venues are small, typically local venues that provide a platform for emerging and independent musicians to perform. They are often pubs, clubs, or other small spaces where artists can hone their craft, gain experience, and connect with a local audience. These venues play a crucial role in nurturing talent and supporting the development of the music scene. • A member of Music Venues Alliance Brighton or Music Venues Trust or similar
Nightclubs	<ul style="list-style-type: none"> • Provide regulated entertainment and the sale of alcohol • Main licensable activity is recorded and live music with provision of dance floors, sound systems and light displays • Generally, operate at night and into early hours of the morning
Public houses and bars	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises • Sale of alcohol takes place at the bar • Includes tap rooms and craft beer pubs • May also carry out other licensable activities • Does not include cafes
Non-alcohol led venues	<ul style="list-style-type: none"> • Cultural venues such as art galleries, museums, theatres • Experiential entertainment venues such as escape rooms and social gaming venues • Alcohol is sold to customers for consumption on the premises • Supply of alcohol is ancillary to entertainment offering • Does not include shared workplaces and co-working offices
Off licences	<ul style="list-style-type: none"> • Supermarkets and convenience stores which supply alcohol for consumption off the premises in addition to other retail products • Includes alcohol delivery services fulfilling remote orders for sale of alcohol • Restrictions on ABV% e.g. the Sensible on Strength 6% condition?
Shared workplaces, co-working offices	<ul style="list-style-type: none"> • Office premises in which individual workstations and meeting rooms are rented to solo workers and small businesses
Members' clubs	<ul style="list-style-type: none"> • Premises authorised to carry out licensable activities under a club premises certificate

- 3.4.4 **Each application will be considered on its own merits.** However, the Licensing Authority will apply the Matrix Approach in all cases unless there are exceptional circumstances which justify a different approach.
- a). **Applications within the CSA** will be subject to a special policy requiring robust measures to be included in the operating schedule to promote safety. Applications within the SSA will be subject to the special stress policy set out in 3.3.
 - b). **Exceptional circumstances.** The Licensing Authority will determine exceptional circumstances on a case-by-case basis. An example of exceptional circumstances could be where the applicant has provided sufficient assurances to the responsible authorities that they do not make relevant representations against the application. Another example is where the application is for a variation to an existing premises licence and the applicant satisfies the criteria for a “good operator”.
 - c). **Activities which the Licensing Authority values and wishes to encourage:** LGBTQ+ and TNBI venues; outdoor regulated entertainment; cafes; members’ clubs; traditional pubs (outside the CSA); non-alcohol led licensable activities, especially within the city centre. The Licensing Authority will aim to permit these types of venues in appropriate locations, but will consider each case – including any relevant representations – on its own merits.
 - d). **Location.** Consideration will be given to the character of the area of the venue in every case. In residential areas, the Licensing Authority will pay particular attention to the potential of a venue to cause public nuisance, especially noise disturbance, littering and anti-social behaviour. In these areas, an early closing time may be appropriate.
 - e). **Food and dining venues.** The Licensing Authority will require conditions to ensure that these venues are food-led, such as: alcohol to be sold only to customers taking a substantial table meal; no takeaway service of food for immediate consumption (an ancillary meal delivery service is acceptable). Where the venue has an agreement to use an adjacent outdoor area, the Licensing Authority will require evidence that a pavement licence has been granted for use of the highway (for highway land) or landowner’s consent (for land other than a highway).
 - f). **Off licences.** 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. 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.
 - g). **Outdoor events.** Outdoor events will generally be supported where they have been arranged through the Council’s event planning process.

3.4.5 Cafes - The Licensing Authority will require conditions to ensure that cafes operate as genuine cafes and not as public houses. The licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following conditions that will prevent the premises becoming a public house.

- The sale of intoxicating liquor and other beverages shall be waiter/waitress service for consumption by persons seated at tables.
- Substantial food shall be available at all times. The licensing authority shall judge each case on its own merits but as a general rule, a bowl of crisps, nuts, or olives does not constitute substantial food.
- Food must be prepared on site and the premises will have a fully operational kitchen.
- A full menu of the hot and cold food items available will be clearly on display within the premises.

3.4.6 Food & Dining Venues - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following conditions.

- Intoxicating liquor shall not be supplied or sold on the premises otherwise than to persons taking table meals there and for the consumption by such a person as an ancillary to their meal. There will be no vertical drinking.
- Food & dining venues with outside service - the licensing authority will also consider applications from these venues that request to serve alcohol to areas adjacent to or immediately outside their premises. In addition to the above conditions for cafes, the licensing authority will require evidence that the applicants have an agreement with the local authority to use the area as defined on a plan provided. The following condition may also apply:
- The sale and supply of alcohol for consumption off the premises shall be restricted to an area licensed by the Local Authority for use of the public highway as shown on the plan deposited and such area shall be defined by a physical barrier acceptable to the licensing authority.

3.5 Good Operator Policy

3.5.1 Good operators of licensed premises are valuable partners in assisting the Licensing Authority to promote the licensing objectives in Brighton and Hove and contributing to our city's unique and vibrant culture. The Licensing Authority has therefore decided to introduce a new policy measure – the Good Operator Policy – to reward and incentivise the responsible management of licensed premises. Under the Good Operator Policy, there will be a presumption in favour of granting applications to vary premises licences which are submitted by good operators as defined by this policy. This includes variations to trading hours beyond the hours indicated by the Matrix Approach. In general, the Licensing Authority will consider granting such applications to be appropriate for promoting the licensing objectives – unless there is

clear and compelling evidence they would be undermined by granting the application.

3.5.2 A "good operator" is an applicant for an application to vary a premises licence who satisfies all of the following criteria:

- at the time of making the variation application, and at the time the application is determined, they are the holder of the premises licence subject to the application
- in the 3 to 5 year period prior to submitting the application, the applicant has not been subject to any formal intervention^[1] by the responsible authorities in connection with that [or any other] premises [in Brighton and Hove]
- Formal intervention includes the following; a formal written warning; an application for review or summary review; a closure notice or closure order; a prosecution for an offence under the Licensing Act 2003; a penalty for employing illegal workers; or an abatement notice

3.6 Live Music, Dancing and Theatre

3.6.1 This policy recognises the need to encourage live music, dancing and theatre for the wider cultural benefits of the community generally. In addressing such issues the potential for limited disturbance in neighbourhoods will always be carefully balanced with these wider benefits. The impact of licensing on regulated entertainment, particularly live music and dancing, will be monitored.

3.6.2 The Licensing Committee represents the general interests of a community in determining what conditions should be attached to licences and certificates as a matter of necessity for the promotion of the licensing objectives. All members of the Licensing Committee will be trained on Licensing Act 2003 and S182 Guidance. The Licensing authority is aware of the need to avoid measures which deter live music, dancing and theatre - such as imposing indirect costs out of proportion to the income of the licence holder and to the risks presented. Only appropriate, proportionate and reasonable licensing conditions should impose any restrictions on such events.

3.7. Off Licences

In recent years there has been a noticeable shift towards more people buying alcohol from shops and drinking at home prior to going into premises such as pubs and clubs. The council is concerned that alcohol loading from off-licence sales is a significant problem in the city and adversely affects the licensing objectives as it gives rise to problems of drunkenness, disorderly behaviour and a higher risk of alcohol sales to children. Representations from the police, local residents and the director of public health at licensing panel hearings have testified to these problems. Additionally, regular test purchasing carried out by Sussex Police in partnership with BHCC Trading Standards has identified that off licences continue to be a place where young people under the age of 18 can purchase alcohol illegally.

- 3.7.1 The city safety policy and area as well as the special stress area apply to off-licences as explained in the matrix approach at 3.5. But in general where applications are made for new premises or variations to existing licences, and where the police or others make representations against the grant of a further licence for off sales, the council will give specific consideration to restricting the number, type, and the hours of premises selling alcohol exclusively for consumption off the premises, training and levels of staffing, are appropriate to ensure that the licensing objectives are promoted in what may be challenging circumstances.
- 3.7.2 The Licensing Authority encourage off licences to join the Council led “Sensible on Strength” scheme to reduce the availability of cheap super strength beers and ciders. Off licences voluntarily sign up not to sell cheap super-strength beers, lagers and ciders over 6% ABV and operate good practice measures (see 3.7.3), for which they receive an accreditation as a responsible retailer.
- 3.7.3 Areas of best practice that may be included in an Operating Schedule include;
- the installation of a digital CCTV system by liaison with, and to a standard approved by Sussex Police
 - Challenge 25 policy
 - Refusals system
 - Documented staff training including underage sales, drunkenness and proxy sales
 - Voluntary restriction of high strength alcohol - operating schedules may be used to limit high ABV beers, lagers and ciders
 - BCRP membership (or other accredited scheme)
 - No sale of single cans
 - Displays should not be located at the entrance/exit points or near checkouts
 - Restrictions on types of alcohol e.g. specialist or geographical region only being sold

3.8 Alcohol Delivery Services

The Licensing Authority and Sussex Police have specific concerns around the delivery of alcohol off the premises due to issues around the end location of delivery, age verification checks (Challenge 25), the increased possibility of the alcohol coming into the CSA and SSA from other areas, as well as the personal safety of drivers when having to refuse a delivery at the end destination. Later hours also mean that persons can access further alcohol beyond what they may be able to access in their local area. There are concerns around persons who are already intoxicated ordering more alcohol to continue their night.

- 3.8.1 Alcohol delivery poses a unique set of challenges as it often transfers the final age verification to a person who has no responsibility in relation to the premises licence which authorised the sale of alcohol. A premises licence holder needs to be

satisfied that their drivers or the delivery drivers of the third party company they chose to use have received regular and comprehensive training in age verification and identifying persons who have consumed too much alcohol. Consideration may be given to using drivers employed directly by the premises as opposed to third party providers.

- 3.8.2 Evidence has shown that customers have previously used landmarks/businesses not related to them as addresses for delivery so that alcohol could be consumed in open spaces/parks. The risk being that this may lead to increased crime and disorder including anti-social behaviour and criminal damage, as well as the possibility that underage persons can gain access to alcohol. Concerns have also been raised about the delivery of alcohol to known street drinking hotspots. Therefore, a condition requiring all deliveries to be to a verifiable residential or business address and a face to face ID verification is vital in mitigating some of this risk.
- 3.8.3 While the Licensing Authority and Sussex Police recognise this is a growing area of business, new or variation applications to include the delivery of alcohol off the premises will be subject to increased scrutiny. Suggested conditions for the provision of an alcohol delivery service can be found at Appendix A1. These are not exhaustive and each application will be considered on its own merits.

3.9 Street Drinking

The Licensing Authority will have regard to areas highlighted by Sussex Police that are at risk from alcohol related anti-social behaviour. The nature of these areas can be fluid/seasonal and so updated maps and data will be produced regularly to ensure the information is current. These hot spot areas are considered high risk for street drinkers and the Licensing Authority will have regard to prevention of crime and disorder by virtue of street drinking and anti-social behaviour when considering applications in this area.

3.10 Promoters and irresponsible drinks promotions

- 3.10.1 The Licensing Act 2003 makes no mention or provision for the use of promoters within licensed premises. Many of the late night bars and clubs within the Brighton & Hove regularly hire promoters to sell nights at their venues. Issues that have been identified with the use of promoters within the nighttime economy, in recent years include individual promoters vouching for underage customers to get them inside licensed premises where they can access alcohol, providing flyers to passersby who throw them on the floor and irresponsible promotions for their nights. Many premises now have an agreement with their promoter for acceptable promotions and behaviour which includes the signing of a written contract of expectations. This shows premises evidencing their due diligence and ensures that promotion companies know what is expected of them. The contract could include obligations to pick up self-generated litter, verification of ages of their customers and users of their social media, promoters being over the age of 18 and responsible advertising on social media.

- 3.10.2 The Licensing Authority expect licensed premises to develop staff policy and training on recognising signs of drunkenness, spiking and vulnerability, for example, offering drinking water and tips for refusing customers who appear drunk. And discourage company policies that promote bonuses and sales incentives for selling alcohol. Licensing Authority will expect necessary precautionary processes to restrict drunkenness, e.g. Licensing Guidance states happy hours should not be designed to encourage individuals to drink excessively or rapidly.

4. Safeguarding Initiatives

4.1 Violence Against Women and Girls (VAWG)

- 4.1.1 The Community Safety Partnership also oversees the Violence Against Women and Girls (VAWG) Strategy as part of their remit. They can be contacted at VAWG.Unit@brighton-hove.gov.uk For information and training on VAWG related issues.

- 4.1.2 Brighton and Hove supports the White Ribbon campaign and the Licensing Authority would encourage all licensed premises to promote the 'White Ribbon Promise' to never commit, excuse or remain silent about violence against women and girls. Training and support is available to support premises to take action, further information regarding training can be obtained from VAWG.unit@brighton-hove.gov.uk . Accreditation is still in progress for BHCC.

4.2 Vulnerability Training

4.2.1 Additional training in safety measures and vulnerability for the night time economy.

Training has previously been delivered by Sussex Police in conjunction with the Brighton Crime Reduction Partnership (BCRP) to staff working within the night-time economy to provide them with knowledge of vulnerability and ensure they understand their responsibilities and duty of care to vulnerable people including actions that must be taken to reduce identified risk.

- 4.2.2 Training carried out or provided to venues should include:

- **Vulnerability Identifiers and Initiatives** - These include what to look for and how to identify if a person is vulnerable or has become vulnerable throughout an evening. It may include schemes such as 'Ask for Angela' which is an initiative for persons that are feeling uneasy in a night time economy venue and need a safe way of leaving. The individual can approach a member of bar staff and ask for Angela and the staff will know this person needs some help getting out of a situation they don't feel safe or comfortable in. This could be calling them a taxi or a friend or family member to come and collect them.
- **Drink Spiking** - The BCRP have facilitated a number of training sessions for bar staff and management around how to respond to a spiking incident. This remains an ongoing concern in the night time economy and venue staff/night

time economy workers should be encouraged to engage in continual learning around this.

- High risk venues will need to have a clear and actionable policy in place to prevent and respond to drink spiking. This includes staff training, procedures for reporting incidents, and support for victims.
- The Home Office Spiking Team also offer free training to people working in the nighttime economy. Further details can be found via the following link: [Spiking Awareness Training Tickets, Multiple Dates | Eventbrite](#)
- **Safety-First Door Policy:** Venues will no longer be allowed to eject vulnerable individuals, especially lone adults, without care. Whether someone is intoxicated, separated from their group, or simply in need of help, venues must act responsibly.

4.2.3 Premises should make themselves aware of the: Night Time Industry Association (NTIA) standards of good practice for dealing with spiking and having a duty of care for customers as well as integrate with other safety-related initiatives in the city. [Guidance & Best Practice - NTIA](#)

4.3 Partner Agency Initiatives

4.3.1 Safe Space

Safe Space, run by Change Grow Live (CGL), runs throughout the year on Fridays and Saturdays (23.30-04.00Hrs) from its base in St Pauls Church, West Street. The project provides a safe place for users of the night time economy who are rendered more vulnerable due to alcohol and/or drug use, or through physical injury or emotional distress. Safe Space regularly provides emotional support to distressed people, including delivering suicide prevention interventions and safety planning (through the ASIST model). First Aid is provided with emotional and practical support from the CGL team. subject to funding, CGL may also deploy a mobile outreach team along the seafront, providing an immediate response to vulnerable individuals and, where safe to do so, transporting them to St Paul's Church. Mobile teams also operate on New Year's Eve in the Kemp Town and East Street areas. The Safe Space initiative also contributes positively to reducing the need for police and medical intervention.

4.3.2 Beach Patrol

Quad bike(s) patrol the beach between 23:00-05:00Hrs Friday and Saturday nights by SIA qualified staff. Equipped with first aid kits, thermal blankets, defibrillator, and a night-safe radio. Visual presence has reduced crime on the beach including sexual assaults. Brighton Beach Patrol (BBP) educates people of the dangers of going into the sea and has actively got people out of the sea and back on to the safety of the beach. BBP started in May 2015 and is operated by volunteers. The service has achieved charitable status. The service utilises quad bike(s) and SIA security staff to patrol the beach between the Piers

protecting the vulnerable from potential drownings, assaults, intoxication, and safeguarding matters. BBP operates every weekend and operates on additional days for high-risk events and bank holidays. BBP provide weekly reports to key stakeholders, including the police and coastguard.

4.3.3 Street Pastors

Operate every Friday night from around 22:00-02:30Hrs. Patrol West Street, North Street, East Street, Queens Road, Churchill Sq., The Lanes and Seafront.

4.3.4 Nightlife Safety Advocates (NSA) scheme

The University of Sussex Students' Union operates a student-led Nightlife Safety Advocates (NSA) scheme, established in November 2021 in response to national concerns about spiking and sexual harassment in nightclubs.

Trained student (NSAs), provide peer-to-peer welfare support at nightclub events, operating from equipped stalls within venues. They offer non-judgmental support, distribute safety resources (including leaflets, condoms, period products), and provide follow-up signposting to support services.

Key Objectives

- Provide accessible peer-to-peer support from students that attendees can relate to.
- Increase awareness of reporting tools for sexual assault, harassment, and spiking.
- Improve education around spiking prevention and consequences.
- To improve access to support for students who have experienced harm/have become victims or require safeguarding support.
- Promote sexual consent awareness and sexual health provisions.

The aim is to have a multilayered approach through education, signposting and peer to peer support. By having student staff as NSA team, it will better connect students who are in need of existing support structures. Through supporting students via signposting emails, it raises awareness of support services and empowering students to report or seek help particularly if they are victims of sexual offences, harassment or domestic abuse.

By being a presence at events it is hoped to deter those who may see student events where they can seek out vulnerable people.

There is a key educational aspect of the programme via the stalls set up within key premises and every event attended, plus in busy spaces such as Freshers' and Refreshers' Fairs for new students. Each stall is equipped with leaflets and resources covering a variety of topics ranging from domestic abuse support, spiking, sexual health and managing stress and anxiety.

4.3.5 Student and Organised Pub Crawls

The Licensing Team and other agencies work with universities, event organisers and promoters to ensure events are responsibly run to include good practice measures based on mandatory conditions and promoting licensing objectives. Such measures include stewarding, on site medics, discounted non-alcoholic drinks, water angels, and promotion of non-alcohol events.

4.3.6 Back Off Back Up (Bobu)

Bobu is a Brighton-born and based initiative supporting licensed venues to create spaces where people feel safe, included and able to ask for help. Venues complete an online practical training course that teaches staff how to spot and respond to harassment, discomfort or conflict.

Once training is complete, venues are listed on the 'bobu app', a free tool customers use to find and choose venues known for care, respect and support.

Displaying the bobu sticker shows customers that your venue is part of the bobu safety network and that help is available inside. Being on the bobu app and network helps venues stand out as safe, inclusive, welcoming spaces.

4.3.7 Operation Marble

Due to the large concentration of licensed premises and night clubs in the centre of Brighton, a high proportion of the Division's violent crime and serious sexual offences are committed within a relatively small area. This has remained consistent in the data sitting behind this policy covering the years 2022, 2023 and 2024. The Division receives a large influx of visitors to the city centre at weekends. Many of these people attend the pubs and night-clubs during night time hours and as a result an enhanced policing operation is provided, called Op Marble.

Op Marble is kept under regular review by the Operations Inspector and since 2017 has run from 20:00 to 06:00 between 1st May and 30th September. This was in response to pressures from the Night Time Economy as pubs and clubs remained open later and increases in crimes in the earlier hours of the morning. The emphasis of Op Marble remains a highly visible presence of officers deployed on foot as well as focus on regularly updated hot spots to help reduce the risk of violent crimes. As the technology around hotspot policing develops, officers can be deployed in an increasingly dynamic way to ensure they are patrolling high harm areas within the centre of the city as identified by the latest data analysis.

In addition to the standard Friday and Saturday night, there are a number of standalone operations such as Bank Holidays, New Year's Eve, Halloween and Pride. In the run up to Christmas, additional resources are at times deployed during the end of week to monitor Christmas parties.

Op Marble covers an area between Preston Street to the West – The Level to the North – Kemptown to the East and the seafront between West Pier and

Concorde 2 to the South. This covers the majority of the CSA defined in this policy at 3.1 and is regularly under review to ensure that limited Police resources are being used to their optimum.

4.3.8 Doorstaff Briefing

In association with the Business Crime Reduction Partnership (BCRP) – Police lead a weekly Friday night doorstaff briefing at a central night time economy venue. Covered are persons of interest and information is shared on any events that might impact the city during that weekend – music events, football etc. Additionally there is a weekly meeting held between Police, BCRP and the Night Safety Marshalls to review the previous weekend, any upcoming events and discuss any premises or geographical areas of concern. This feeds into the plan for the weekend ahead and forms part of the Friday night doorstaff briefing.

4.3.9 Night Safety Marshalls

The Night Safety Marshall scheme is funded by Sussex Police and operates to assist vulnerable persons on Friday and Saturday night between 20:00-04:00 hrs.

4.3.10 Brighton Crime Reduction Partnership (BCRP)

The Brighton Crime Reduction Partnership offer vulnerability training initiatives to our members, including regular updates on what is happening in the night time economy (NTE) and strategies for how venues can look out for and assist venues. We also complete referrals to partner agencies where needed utilising our DISC intelligence report system. Some further information can be found here, <https://www.bcrpbrighton.com/initiatives>. We also have our city-wide radio network which connects businesses to each other, security, police, coastguard, Night Safety Marshalls, Safe Space etc. and this is routinely used to put messages to assist vulnerable persons from calling for help spotting predatory behaviour. For more information on our initiatives, please visit BCRP Brighton Initiatives.

5. Licensing Act 2003 provisions

5.1 Temporary Event Notices (TENs)

The Licensing Authority will encourage bona fide community events. Applications for TENs at existing licensed premises will not be encouraged where the proposal is simply to extend the existing hours of operation and applications made in cumulative impact areas will be subject to increased scrutiny by Police and Environmental Health. Licensing Guidance recognises that TENs are a light touch process, not requiring specific authorisation. If the police or Environmental Protection believe that allowing the premises to be used in accordance with the TEN will undermine the licensing objectives, they must issue an objection notice.

5.2 Shadow Licences

- 5.2.1 A “shadow licence” is a simple way of describing a licence which has been obtained by one party in respect of premises to which another licence has already been granted to someone else. The usual reason for this would be to protect the landlord in case the tenant surrenders the licence without giving the landlord any notice or if review proceedings are brought against the licence and the licence is revoked and the landlord has no knowledge of this. In such a scenario there is a primary or live licence operated usually by a tenant and the ‘shadow licence’ is an additional licence often by the Landlord which sits behind the primary licence.
- 5.2.2 The word Shadow Licence is used in practice but has no legal definition. It is simply another licence on exactly the same terms as the first licence, normally granted to a landlord, whose sole purpose is to provide the landlord with the comfort and protection of having a licence in its own name. If the original operating licence, then lapses or is surrendered, the landlord is able to use the Shadow Licence to replace it and market the premises as having the benefit of a licence of the same quality.
- 5.2.3 The Authority recognises that there is no restriction in the Licensing Act 2003 for there to be more than one licence to be in effect at any one time at the same premises. The Licensing Authority has concerns, however, that the holding of additional licences has the potential to undermine the decisions made as a result of determining applications to review a premises licence whereby if one licence was modified, suspended or revoked the premises could effectively continue to operate under the second licence.

6. Prevention of Crime and Disorder

The following details and measures are intended to address the need for the prevention of crime and disorder which may be associated with licensed premises and certificated club premises. Conditions attached to licences and certificates will, as far as possible, reflect local crime reduction strategies.

- 6.1.1 The licensing authority acknowledges that training and good management play a key part in preventing alcohol and drug related crime. The authority expects that all licensees of on-licensed premises attend training programs which will raise their awareness of the issues relating to spiking, drugs and violence in licensed premises, and that suitable training be extended to all bar staff and door supervisors so that drug dealers and users will be deterred from using licensed premises for illegal purposes and that incidents of violence in licensed premises will be reduced. Licensees are also encouraged to attend training programs to help identify children at risk and issues of basic child protection and vulnerable individuals. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence and their responsibility to uphold all four licensing objectives.
- 6.1.2 It is expected that the DPS will spend a significant amount of time on the premises. When not on the premises it will be essential that the DPS is contactable, particularly should problems arise with the premises and that staff are authorised by the DPS.

- 6.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.
- 6.1.4 Measures put in place should support the intentions of Operation Marble (police operational order), which aims to prevent incidents of crime and disorder within the night time economy, at weekends. Operation Marble operates with a view to minimising the risk to the public of being a victim of public place violent crime; to reduce incidents of violent crime and public disorder within the city centre; to deal positively with offences and offenders; to secure and preserve evidence which will assist in the prosecution of offenders and to support the night time economy and the responsibly run businesses within it.

6.2 Sussex Police

- 6.2.1 Sussex Police have a specific Operation relating to the night-time economy called Operation Marble (detailed in 3.4.1) and work closely with partners to ensure a safe and vibrant city centre. Police data shows the correlation between intoxication and violent crime is highest in the city centre. There continues to be an increasing demand for resources further into the early hours of the morning with the highest sustained risk during the week occurring on a Friday into Saturday between 22:00 – 04:00 (with moderately high risk until 05:00) and a Saturday into Sunday between 21:00 – 04:00 (again with a moderately high risk until 05:00). For full details of these statistics see the Police Data set at Appendix E.
- 6.2.2 The dealing and use of drugs remains an issue across the city and Sussex Police welcome proactive policies from licensed premises. A drug safe and seizure recording initiative is in place of which further details can be obtained by contacting Brighton & Hove Police Licensing (brighton.licensing@sussex.police.uk). This initiative encourages licensed premises with Door Supervisors to search and seize drugs from persons attempting to enter their premises and ensures that once drugs are removed from persons, they can be safely collected and destroyed by Sussex Police. We ask that licensed premises make regular contact with Police Licensing to get seized items collected.
- 6.2.3 Dispersal from the city centre during the late evening and early morning remains a policing challenge. Over recent years, there has been a proliferation of off-licences and late night refreshment venues offering walk in/take away services along the city's arterial routes. This has led to incident 'hot spots' where patrons from the night time economy continue to interact, albeit away from any safety measures afforded by on-licences. As such, Sussex Police support the Council's Special Policy in offering guidance to both applicants and the Licensing Committee in relation to off-licences and late night refreshment licences.
- 6.2.4 Sussex Police have continuing concerns that, despite staff training in age-restricted sales, under age individuals are still being served alcohol both on and off the premises in some of the city's licensed premises. As such, regular intelligence-led 'test-purchase' operations are conducted to highlight premises where sales are taking place and ensure appropriate enforcement action is taken to prevent further sales. The introduction of identification scanning machines at premises throughout

the city has proved successful in mitigating some risk, but operators must maintain vigilance regarding the fraudulent use of genuine IDs. Sussex Police continue to work alongside the Business Crime Reduction Partnership (BCRP) to tackle the problem of those who use false or another's identification to enter licensed premises and purchase alcohol. The advent of digital identification means that the ID process is continually evolving. There is an expectation by Sussex Police and the Local Authority that licensed premises are proactive around staying informed and abreast of any changes and providing training / support to their staff as required.

- 6.2.5 Sussex Police work closely with venues and other organisations within the city to protect vulnerable people from becoming victims of crime. As well as work to prevent under age sales, vulnerability training is offered to identify persons who may have been made vulnerable through alcohol or drugs. Additionally, spiking awareness training has regularly been organised by the BCRP, the PCC and other external providers. Sussex Police also support initiatives such as (but not limited to) safe spaces, night safety marshals, mobile teams of volunteers actively checking people's well-being and the Beach Patrol.
- 6.2.6 Public Space Protection Orders have proved an effective tool for Sussex Police in targeting enforcement action in problem areas of the city. It *'allows Police Officers and Police Community Support Officers to remove alcohol from any person in a public place if that person is involved in anti-social behaviour (ASB) or the officer believes that by having alcohol in their possession there is an increased risk of ASB. It is an offence to refuse to hand over alcohol when required to do so.'* They have been particularly effective in the day time economy where members of the street community are causing ASB issues for members of the public and local businesses, especially during the summer months where there is a large influx of visitors to Brighton & Hove.
- 6.2.7 Policing the night time economy continues to provide a challenge and in the climate of limited resources and newly emerging problems, Sussex Police support maintaining a Special Policy in the city centre which defines areas of high crime and risk and offers restrictions around types of premises that will be granted to ensure that existing issues are not extended. Police will continue to take enforcement action where appropriate if the actions of a Premises Licence Holder, Designated Premises Supervisor, Door Supervisors or Staff have fallen below the high standard expected across the city. Sussex Police also recognise and support businesses which are aware of their social responsibilities and as such, actively contribute towards keeping Brighton & Hove a safe and enjoyable city.

6.3 Care, control and supervision of premises

- 6.3.1 The Licensing authority supports the Business Crime Reduction Partnership and other approved schemes. Where appropriate, premises licence holders should be members of the BCRP for the deterrence to violent crime that such membership provides. The BCRP NightSafe radio scheme is normally expected as an operational requirement for city centre bars, clubs and pubs and is an example of best practice in achieving the aim of reducing crime and disorder and improving public safety. Well managed pub-watch schemes provide information exchange between the premises

licence holders and responsible authorities that reduce and deter violent crime and disorder. The council will support a responsible licensing scheme.

- 6.3.2 The effective management and supervision of a venue is a key factor in reducing crime and disorder, both within it and outside. The police will consider the applicants, objecting to the application where appropriate. The police may suggest crime prevention measures in relation to, for example, the internal layout of the premises, closed-circuit television, help points, lighting and security staff. The police may ask for conditions which support such measures to be imposed when licensing applications are granted, eg type of licence, capacity, operating hours restrictions.
- 6.3.3 Following the grant of a licence, the management and supervision of the premises, in so far as it might impact on crime and disorder, will continue to be monitored. Particular attention will be paid to any licensed premises where there is evidence of criminal activity or any association with racist or homophobic crime. The licensing authority will keep itself well briefed on the nature, location and type of premises where alcohol related violence and disorder are occurring so it can take full account of the facts and avoid exacerbating problems as required by the Community Safety Strategy. Where licensed premises are found to cause nuisance or be associated with disorder or unreasonable disturbance, the review process may be invoked, and powers of revocation or the imposition of conditions may be considered. Conditions may include use of closed-circuit television, licensed door supervisors and earlier closing times. Such action to restrict the operation may be taken for trial periods to allow businesses an opportunity to remedy existing disorder, nuisance or disturbance.
- 6.3.4 This policy recognises the use of registered Door Supervisors. All Door Supervisors will be licensed by the Security Industry Authority. Mobile security units and similar systems are in use by some premises operators as a means of providing security cover at very short notice at premises which may not normally require a permanent security presence. This policy endorses the use of units following such guidance and standards in appropriate circumstances.
- 6.3.5 The development of codes of practice and general operating standards for security companies is encouraged for local businesses; premises operators are urged to ensure that security services, when engaged, are provided by suitably qualified businesses operating to recognised standards and who should be working towards SIA accreditation.
- 6.3.6 Enforcement will be achieved by the enforcement policy appended (Appendix B).

7. Public Safety

The following details and measures are intended to address the need for the protection of public safety which may be associated with licensed premises and certificated club premises.

- 7.1.1 The permitted capacity is a limit on the number of persons who may be on the premises at any time, following a recommendation by the relevant fire and rescue authority under the Regulatory Reform (Fire Safety) Order 2005. For any application for a premises licence or club premises certificate for premises without an existing permitted capacity where the applicant wishes to take advantage of the special provisions set out in section 177 of the 2003 Act, the applicant should conduct their own risk assessment as to the appropriate capacity of the premises. They should send their recommendation to the fire and rescue authority which will consider it and decide what the “permitted capacity” of those premises should be.
- 7.1.2 Normally in the city centre, pubs and clubs will be expected to operate using polycarbonate or toughened/shatterproof glass.
- 7.1.3 Conditions may be imposed in accordance with operating schedules to protect public safety including where justified:
- a). provision of closed-circuit television and panic buttons.
 - b). use of shatterproof drinking vessels; bottles requiring use of toughened glass or reusable plastic should normally be required unless applicants can show exceptional reasons.
 - c). use of door supervisors, licensed by the Security Industry Authority.
 - d). requirement of a minimum of a licensed door supervisor for every 100 customers in nightclubs and large city centre pubs or as indicated by risk assessment.
 - e). occupant capacity conditions will be applied where appropriate.
 - f). the provision of designated and suitably trained first aiders.
- 7.1.4 Where appropriate, licence holders or their authorised representatives will submit event safety plans and operating manuals, attend Event Planning Teams or Safety Advisory Groups and similar meetings prior to large events and shall be part of Event Liaison Teams during such events. Due regard shall be had to relevant guidance and publications including, for example: HSE approved code of practice for events.
- 7.1.5 **Preparing for Martyn's Law Requirements**

Licence holders should familiarise themselves with the requirements of Martyn's Law (the Terrorism (Protection of Premises) Act 2025), which will require certain premises and events to consider how they would respond to a terrorist attack. While the Act will not come into force for at least 24 months (from April 2025), early preparation will help ensure compliance and enhance the safety and security of staff and visitors. The Government will publish guidance during the implementation period to assist in understanding the specific requirements. For further information please go to: [Martyn's Law Factsheet – Home Office in the media](#)

8. Prevention of Public Nuisance

The following details and measures are intended to address the need for the prevention of public nuisance which may be associated with licensed premises and certificated club premises:

- 8.1.1 In determining applications for new and varied licences, regard will be had to the location of premises, the type and construction of the building and the likelihood of nuisance and disturbance to the amenity of nearby residents by reason of noise from within the premises, as a result of people entering or leaving the premises or from individuals or groups of customers gathered outside (e.g. in order to smoke).
- 8.1.2 Applications for new licences or for the extension in size of licensed premises should not normally be granted if the premises will use amplified or live music and operate within or abutting premises containing residential accommodation except that occupied by staff of the licensed premises. A condition may be imposed on new licences that entertainment noise shall be inaudible in any residence. Noise emanating from within licensed premises should not normally be audible outside.
- 8.1.3 Installation of sound limiting equipment and sound insulation may be required to minimise disturbance to the amenity of nearby residents by reason of noise from the licensed premises.
- 8.1.4 Generally, regulated entertainment in the open air including tents and marquees should have a maximum closure hour of 2300. Earlier hours may be imposed in sensitive open spaces or near residential areas. The Licensing Authority will have regard to Noise Council guidance.
- 8.1.5 In determining applications for new licences or extensions in hours or terminal hours of licensed premises, regard will be had to late night public transport availability and location of taxi ranks to aid dispersal of customers.
- 8.1.6 Reasonable controls are available to all premises operators to minimise the impact of noise from customers outside. The council's Environmental Health Department has issued guidance on a number of steps that can be taken in this respect which are endorsed by this policy (see 8.2 below).

8.2 Smoking Advice

8.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on their premises and ensure that all staff are aware of the contents of this plan, and that it is effectively implemented. Noise from people smoking and talking can be intermittent, vary in character and volume and be intrusive. An effective smoking management plan will help prevent neighbours being disturbed.

- Comply with any planning conditions restricting the use of outdoor areas.
- Ensure that any structures used by smokers comply with the design criteria detailed in the Health Act 2006 and that any structures, awnings, retractable canopies, etc have the relevant planning permission.
- Ensure any new lighting to outdoor areas must be designed so as not to cause a light nuisance to neighbours and again have the relevant planning permission and building control consent.
- Ensure that the conditions on the premises licence are complied with. There may be conditions restricting the hours of use of gardens and outdoor areas. Having reviewed the contents of the premises licence it may be necessary to request a variation of your licence.
- Licence tables and chairs on the Public Highway under the provisions of the Highways Act 1980. These licences may have conditions restricting the times that the area can be used.
- Ensure drinks, glasses and bottles are not taken onto the highway unless there is a tables and chairs licence permitting use. A system should be adopted to prevent theft and 'spiking' of drinks and reminding customers not to leave unattended items.
- Discourage smokers remaining in gardens and outdoor areas and determine terminal hours.
- Discourage smokers remaining outside by removing/disabling tables and chairs or prohibiting their use after a certain time. Lights and heaters will also be turned off.
- Introduce a system that after a certain time the number of smokers outside are restricted to a maximum number. Staff will be needed to manage this restriction.
- Employ staff and/or SIA registered door supervisors to manage doors and control customers and smokers entering and leaving the premises. Staff positioned on the doors can help to encourage customers not to cause a noise problem. It may be that staff are required to manage doors after a certain time, particularly during the hours when neighbouring residents are trying to sleep.
- Ensure door supervisors maintain order outside venues and protect customer safety. BCRP supports the use of Night Safe. Radio net and other pager systems and pub watch schemes can be used to provide for rapid police response and alert other venues where customers and staff are endangered.
- Position signs to remind customers that the premises is in an area where people live. It is not always obvious in busy commercial streets with flats above. By changing the design and wording of signs customers do not forget. Signs can be located in and outside the premises and on tables.
- Use CCTV to manage outside areas.

- 8.2.2 Licensed premises should normally display prominent, legible signs at exits reminding customers to leave in a quiet, peaceful, orderly manner.

9. Protection of Children from Harm

The following details and measures are intended to address the need for the protection of children from harm; this includes emotional and physical harm which may be associated with licensed premises and certificated club premises (for example the exposure too early to strong language and sexual expletives, e.g. in the context of film exhibitions or where adult entertainment is provided). It is intended that the admission of children to premises holding a premises licence or club premises certificate should normally be freely allowed without restricting conditions (unless the 2003 Act itself imposes such conditions or there are good reasons to restrict entry or to exclude children completely).

- 9.1.1 Licensees should note the concern of the authority that drink related disorder frequently involves under 18's. To prevent illegal purchases of alcohol by such persons, all licensees should work with a suitable 'proof of age' scheme and ensure that appropriate identification is requested prior to entry and when requesting alcohol, where appropriate. Appropriate forms of identification are currently considered to be those recommended by the Home Office, police, trading standards officers and their partners (eg passport, photo driving licence or pass card). The advent of digital identification will bring new technologies and challenges which responsible authorities and licensees will need to be mindful of and have a personal responsibility to remain informed and trained on.
- 9.1.2 It is the licensing authority's expectation that all staff responsible for the sale of intoxicating liquor receive information and advice on the licensing laws relating to children and young persons in licensed premises. Licensed premises staff are required to take reasonable steps to prevent under age sales. The licensing authority will not seek to limit the access of children to any premises unless it is necessary for the prevention of emotional or psychological harm to them. Each application will be considered on its own merit but particular areas that will give rise to concern in respect of children are to be found in section 97.1.4 below.
- 9.1.3 To reduce alcohol-induced problematic behaviour by under 18 year olds, to enforce underage purchase and drinking laws and to assist in the protection of children from harm, the licensing authority supports the following measures: -
- a). Police should exercise powers (Confiscation of Alcohol (Young Persons) Act 1997) to remove alcohol from young people on the street
 - b). Police and trading standards should implement test purchasing to reduce sales to under 18s in on and off sales licensed premises
 - c). Further take-up of proof of age schemes will be promoted
 - d). In-house, mystery shopper type schemes operated by local businesses will be supported

e). Providers of events specifically catering for unaccompanied children should consider whether all staff at such events need to be DBS checked

f). Use of a PSPO in the City Centre

9.1.4 The licensing authority will not seek to require that access to any premises is given to children at all times – under normal circumstances this will be left to the discretion of the licensee. The following areas give rise to concern in respect of children, who will normally be excluded from premises:

- where there have been convictions for serving alcohol to minors or with a reputation for underage drinking;
- with a known association with drug taking or dealing;
- where there is a strong element of gambling on the premises;
- where entertainment of an adult or sexual nature is commonly provided;
- where premises are used primarily or exclusively for the sale and consumption of alcohol and there is little or no seating for patrons.

Options may include:

- limitations on the hours when children may be present;
- age limitations (below 18);
- limitations or exclusions when certain activities are taking place;
- requirements for an accompanying adult;
- full exclusion of people under 18.

9.1.5 Licensees of premises giving film exhibitions will be expected to include in their operating schedules arrangements for restricting children from viewing age restricted films. Such premises will be subject to a mandatory condition requiring that access will be restricted to only those who meet the required age limit in accordance with any certificate granted by the British Board of Film Classification,

9.1.6 Where children are expected to attend a public entertainment, appropriate adult supervision will be required to control the access and egress of children and to protect them from harm. This will normally be an adult member of staff for every 100 children. Where the entertainment is music and dancing, 2 persons, licensed by the Security Industry Authority (door supervisors) should be employed for every 100 children but will be subject to advice within the Event Safety Guide. Nothing in this policy shall seek to override child supervision requirements contained in other legislation or regulations. For exclusively under 18 events reference should be made to police guidelines (available from the Police Licensing Unit, Brighton tel. 101). The licensing authority recognises the Director of Children's Services as being competent to advise on matters relating to the protection of children from harm. Applicants shall copy their applications to the Director of Children's Services in its capacity as the responsible authority. Copies should be sent care of the Police. The "What to do" booklet is a national one and can be accessed at: www.brightonandhovepsc.org.uk/wp-content/uploads/What-to-do-if-a-child-is-being-abused.pdf If you are concerned about a child locally to contact the Multi-Agency

Safeguarding Hub (MASH) on 01273 290400, or you can contact Sussex Police on 101. If they think a child is in immediate danger to dial 999.

- 9.1.7 Trading standards and the police undertake ongoing enforcement operations around under-age sales and test purchasing. Sussex Police and BCRP undertake work concerning proxy purchases and counterfeit ID as part of the partnership support work with Community Safety and Trading Standards.
- 9.1.8 Trading standards have a programme of business support including training for local businesses to avoid underage sales. Trading standards offer business support including for local businesses to avoid underage sales. The training also covers identifying fake ID's, Challenge 25, intoxication, proxy purchasing and implementing due diligence measures.
- 9.1.9 Trading Standards also supplies business support materials guidance and advising on the enforcement penalties on all age restricted products for example vapes, tobacco, fireworks etc.

10. Integration of Strategies

- 10.1 The licensing authority shall secure the proper integration of this policy with local crime prevention, planning policy, transport, tourism and cultural strategies by: -
 - Liaising and consulting with Sussex Police, Community Safety Partnership Board, sustainability commission representatives and following the guidance in community safety and crime and disorder strategy
 - Liaising and consulting with Public and Drug and Alcohol Programme Board
 - Liaising and consulting with the East Sussex Fire & Rescue Service
 - Liaising and consulting with the Safety Advisory Group (Emergency Planning)
 - Liaising and consulting with the Planning authority
 - Liaising and consulting with the Highways authority
 - Liaising and consulting with local business and business associations. Having regard to any future documents issued relating to the Private Security Industry Act 2001, for example liaison or information sharing protocols
 - Liaising and consulting with the Trading Standards Team, for example with regard to test purchasing codes of practice
- 10.1.1 In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between all people. This includes people who share protected characteristics, including but not limited to LGBTQIA+ people, disabled people, people from diverse ethnic and cultural backgrounds and people of all faiths and none.
- 10.1.2 This policy supports the aims of the tourism strategy, recognising the benefits for the tourism economy of creating a safer and more attractive city centre and improving competitiveness with other European cities. The Licensing Committee should receive

any reports relevant to the needs of the local tourist economy and the cultural strategy for the area to ensure that it considers these matters.

10.1.3 The Licensing Committee should receive relevant information relating to the employment situation of the area and the need for new investment and employment where appropriate.

10.1.4 Specific conditions may be attached to premises licences to reflect local crime prevention strategies. Such conditions may include the use of closed circuit television cameras, use of the NightSafe radio system or accredited scheme, the provision and use of shatterproof drinking receptacles, drugs and weapons search policy, the use of registered door supervisors, specialised lighting requirements, hours of opening. Certificates issued to club premises shall reflect local crime prevention strategies and may include any or all of the requirements listed above.

10.1.5 The licensing authority will have regard to the need to disperse people quickly and safely from the city centre to avoid concentrations which may produce disorder and disturbance.

10.2 Other regulatory regimes

10.2.1 This policy avoids duplication with other regulatory regimes wherever possible. The following notes are made with regard to specific regimes:

Health and Safety: Certain premises will be the subject of health and safety enforcement by the local authority or the Health and Safety Executive (HSE). If other existing law already places certain statutory responsibilities on an employer or operator of premises, for example the Management of Health and Safety at Work Regulations 1999, it will not be necessary to impose the same or similar duties on the premises licence holder or club. However, existing duties will not always adequately cover specific issues that arise on the premises in connection with, for example, certain types of entertainment, and where additional and supplementary measures are necessary to promote the licensing objectives, necessary, proportionate conditions will need to be attached to a licence.

Fire Safety: Premises and their operators will be regulated by general duties under current fire safety regimes and the Regulatory Reform (Fire Safety) Order 2005 rather than licensing provisions.

Noise: Statutory and public nuisances are dealt with by the local authority's Environmental Health department under the Environmental Protection Act 1990, Noise Act 1996 and associated legislation. Noise from commercial premises may often fall under review powers set out in licensing provisions and closure powers in anti-social behaviour provisions.

Equality Act 2010: The Public Sector Equality Duty obliges public authorities to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good

relations between persons who share protected characteristics and persons who do not share it. The local authority's equality and inclusion policy produced under these obligations shall include reference to this statement of licensing policy.

Community relations: Integration of corporate strategies with licensing policy will include the Inclusive Council Policy which recognises the council's role, as a community leader, to promote community cohesion and good relations between diverse communities. Measures to address prevention of crime and disorder recognise the need to improve well being and safety of all the communities in the city. Licensing policy supports the Crime and Disorder Reduction Partnership's crime reduction strategy. In particular it seeks to confront and reduce racist, homophobic, transphobic and religiously motivated crimes, incidents and anti-social behaviour.

Anti-Social Behaviour, Crime and Policing Act 2014: Contains powers to close premises that are causing nuisance or disorder. These powers can be exercised by the council or Police and they replace the closure powers in the Licensing Act 2003. The Act also contains powers to issue Community Protection Notices in respect of persons or businesses committing anti-social behaviour which is spoiling a community's quality of life.

Litter and Smoking: Environmental Services contractors have Clean Neighbourhoods powers to enforce premises operators' responsibilities to keep frontages clear of litter.

Gambling Act 2005: In relation to casinos and bingo clubs, the principal purpose is gaming. The sale of alcohol and the provision of entertainment in such premises is incidental to gaming and in determining whether to permit entertainment that constitutes regulated entertainment under the act, gaming license committees and / or the Gambling Commission will have taken into account relevant government guidance. Accordingly it is felt that the licensing objectives will have been, or will be in the main, adequately considered by such committees and duplication of conditions should be avoided when considering applications under the 2003 Act where relevant representations have been made.

10.3 Enforcement

- 10.3.1 The Enforcement of licensing law and inspection of licensed premises is detailed in the Protocol between Sussex Police, the East Sussex Fire & Rescue Service and Brighton & Hove City Council. This protocol reflects the need for more efficient deployment of Police and Local Authority staff commonly engaged in licensing enforcement and can be found at Appendix D (Lead Agency Status) of the Statement of Licensing Policy. In addition, the Licensing Authority will have regard to its published Licensing Enforcement Policy in making enforcement decisions in accordance with Brighton & Hove City Council's Statement of Licensing Policy (Appendix B). In order to better target enforcement resources, inspections will be undertaken outside of normal office hours and the sharing of information between all enforcement agencies will be encouraged through joint meetings or similar arrangements.

10.3.2 Attention is drawn to the targeting of agreed problem and high risk premises requiring greater attention as identified in the protocol. A number of other council and government policies, strategies and guidance documents must be considered to complement the policy, including:

- Community Safety & Crime Reduction Strategy
- Drugs and alcohol strategies – local alcohol harm reduction strategy
- Objectives of the Security Industry Authority
- The Anti Social Behaviour Act 2003/ASBPC Act 2014
- The Health Act 2006
- The Violent Crime Reduction Act 2006
- Policing and Crime Act 2009

11. Reviews

- 11.1. Reviews represent a key protection for the community. Where the licensing authority considers action necessary under its statutory powers it will take necessary steps to support the licensing objectives. Action following review will be informed by licensing enforcement policy – Appendix B.
- 11.2. Where style of operation of a premises leads to applications concerning likelihood of racist, religiously motivated, homophobic or transphobic crimes or incidents, the review process should also support the community safety policy. Action should be proportionate and licences would normally be suspended or revoked in these circumstances to deter further incidents.

12. Contact Details, Advice and Guidance

- 12.1. Guidance notes to accompany this policy and details about the licensing application process, including application forms, can be found:
- E-mail: ehl.licensing@brighton-hove.gov.uk
 - Via www.brighton-hove.gov.uk (search under Licensing Act 2003 and follow the relevant links, for example to the Licensing Applications page for a weekly update of applications received)
 - By contacting the Licensing Team at:
Bartholomew House Bartholomew Square,
Brighton BN1 1JP
 - By telephoning them on 01273 294429
- 12.2 Advice and guidance to applicants may also be sought from other agencies and departments by contacting them at:

- **Director of Public Health** Hove Town Hall Norton Road Hove BN3 1PT
Tel: 01273 296555
- **Police Licensing Unit**, Police Station, John Street, Brighton, BN2 0LA.
Tel: 101 brighton.licensing@sussex.police.uk
- **Fire Authority, East Sussex Fire and Rescue Service**, Whitley Road, Eastbourne, East Sussex, BN22 8LA Tel: 01323 462409
firesafety.consultations@esfrs.org
- **Planning, Development Control**, Hove Town Hall, Norton Road, Hove, BN3 1PT. Tel: 01273 290000 www.brightonhove.gov.uk/planning
Planning.Applications@brighton-hove.gov.uk.
- **Environmental Health, Environmental Protection Team**, Bartholomew House, Bartholomew Square, Brighton, BN1 1JP. Tel: 01273 294266
ehl.environmentalprotection@brighton-hove.gov.uk
- **Child protection** – Head of Safeguarding, Families, Children & Learning Services, Hove Town Hall, Norton Road, Hove, BN3 3BQ www.brightonhove.gov.uk/families-children-and-learning/refer-child-or-family-front-doorfamilies
- **Trading Standards** – Bartholomew House, Bartholomew Square, Brighton, BN1 1JP Trading.Standards@brighton-hove.gov.uk
- **Health and Safety Executive HSE** - informationrequest@hse.gov.uk

Please note the above were correct at time of publication but may be subject to change; please contact the Licensing Authority if you have queries regarding the above contact-points.

APPENDIX A – Licensing Best Practice Measures

Best Practice Measures to be included for consideration, in the SSA

Matters that would normally be expected in operating schedules:

- A general knowledge and understanding of the Licensing Act 2003 (The Act).
- The adoption of a policy (e.g. Challenge 25) with acceptable proof of ID.
- A smoking policy which includes an assessment of noise and litter created by premises users
- The use of reusable plastic and polycarbonate drinking vessels and containers, especially in outside areas or after specified hours
- A policy in relation to searching customers and for drugs, weapons, seized or lost and found property
- Keep and maintain refusals book for registering attempts to buy alcohol by under-age persons or refusals to those intoxicated
- The installation of a digital CCTV system by liaison with, and to a standard approved by, Sussex Police. With access available to individuals working on the premises.
- A documented equalities and inclusion policy framework that demonstrates a commitment to creating a fair, diverse, and inclusive environment.
- Policies for dispersal of customers which may include signage regarding taxi services', telephone numbers and advice to respect neighbours and minimise noise, this also includes for customers using external areas.
- Licence holders should have clear documented policies and procedures in place which identify all public safety risks associated with their premises for both customers and staff and measures implemented to prevent, manage and respond to those risks.

Items to which positive consideration would be given:

- membership of Business Crime Reduction Partnership
- use of 'NightSafe' radio system or similar accredited scheme
- regular training and reminders for staff in respect of licensing legislation, policies and procedures; records of which should be properly recorded and available for inspection
- records of regular checks of all parts of the premises in relation to drug use
- systems in place to ensure details of barred clients are exchanged with other operators
- giving an agreed minimum notice of special events (screening of major sports events, birthday parties, adult entertainment, etc.) to relevant authorities and use of appropriate additional measures at such events

- Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance

Recommend best practice for both on and off premises

- Staff must be aware of the risk of the problem of proxy sales and offer assistance to responsible authorities to deter offences
- Signage on premises should set out legal duties
- Voluntary restriction of high strength alcohol – operating schedules may be used to limit high ABV beers, lagers and ciders
- Staff training – in addition to personal licence holders training, staff must be adequately trained for duties
- Challenge 25 would be the norm, particularly in the off licence trade
- Appropriate signage and training for the deterrence of proxy sales

Additional Best Practice Measures to be included for consideration, in the CSA

Applications within the CSA will be expected to include in the proposed operating schedule robust additional measures (as appropriate to the nature and location of the venue) which are set out below. These best practice measures place a special emphasis on safety, including measures to tackle drink spiking, preventing intoxication, unwanted sexual behaviour and the use of ID scanners.

Objective	Best Practice Measure/suggested conditions
An understanding of the Licensing Act 2003 (The Act)	Well trained staff will contribute to well run premises and a responsible approach to the sale of alcohol, provision of entertainment and late-night refreshment. Formal qualifications for your staff, either to Personal Licence level or to another appropriate standard recognised by bodies such as the British Institute of Innkeepers (BII) would be preferential
Preventing Intoxication on Licensed Premises	Licence holders must ensure all staff understand their legal responsibilities under the Licensing Act 2003, particularly that serving alcohol to intoxicated persons is an offence. To prevent intoxication occurring on premises, operators should: * Avoid promotional activities that encourage customers to drink more than intended or consume alcohol rapidly * Refuse admission to individuals who are already intoxicated upon arrival * Train staff to recognise early warning signs of intoxication, utilising all team members including glass

	<p>collectors as additional observers, and consider installing mirrors to improve visibility across the premises</p> <p>* Provide staff training covering alcohol's effects and techniques for managing difficult situations, giving them the knowledge and confidence needed to refuse service to intoxicated customers.</p>
<p>A comprehensive Duty of Care Policy to be established in relation to preventing intoxication</p>	<p>Setting out the steps staff should take to prevent intoxication, and the actions required when customers become intoxicated on the premises. This policy should recognise that intoxicated individuals may become separated from friends who would otherwise care for them, making them vulnerable to harm or exploitation.</p> <p>Given Brighton and Hove's diverse community, the policy should specifically address:</p> <p>* LGBTQ+ customer safety: Staff should be aware that intoxicated LGBTQ+ individuals may face additional risks including targeted harassment, discrimination, or hate crime</p> <p>* Violence Against Women and Girls prevention: Recognition that intoxicated women and girls are particularly vulnerable to predatory behaviour, with clear procedures for identifying and responding to concerning situations</p> <p>The policy must ensure that no intoxicated person is left unaccompanied or placed in a taxi without appropriate supervision. All premises staff must be familiar with and trained in implementing this policy.</p>
<p>The installation of a digital CCTV system by liaison with, and to a standard approved by, Sussex Police. With access available to individuals working on the premises.</p>	<p>Subject to GDPR guidance and legislation:</p> <p>* Digital CCTV and appropriate recording equipment to be installed in accordance with Home Office Guidelines relating to UK Police Requirements for Digital CCTV System (PSDB Publication Number 09/05), operated and maintained throughout the premises internally and externally to cover all public areas, including the entrance to the premises. The system shall be on and recording at all times the premises licence is in operation.</p> <p>* The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.</p> <p>* CCTV footage will be stored for a minimum of 31 days.</p> <p>* The management will give full and immediate cooperation and technical assistance to the Police in the</p>

	<p>event that CCTV footage is required for the prevention and detection of suspected or alleged crime.</p> <ul style="list-style-type: none"> * The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy. * Subject to GDPR guidance and legislation, the management of the premises will ensure that key staff are fully trained in the operation of the CCTV, and will be able to download selected footage onto a disk (or other electronic portable device acceptable to Sussex Police e.g. USB) for the police without difficulty or delay and without charge to Sussex Police. * Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk. Repair records /invoices shall be kept on site for at least 12 months and be readily available to be viewed by all authorised person upon request. * In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Sussex Police or for any other reason, the premises will be expected to install a replacement hard drive or a temporary replacement drive as soon as practicable.
Incident reporting	<p>An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. The log will be inspected and signed off by the DPS (or a person with delegated authority) at least once a week.</p> <ul style="list-style-type: none"> * The logbook should be kept on the premises and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence.
Security in and around the premises	<p>The employment of SIA registered door supervisors in line with Police recommendations and/or a written risk assessment to supervise admissions and customers inside and outside the premises.</p> <ul style="list-style-type: none"> * SIA badges must be clearly displayed whilst working. * Door staff should sign into a register detailing their full SIA licence number, their name, contact details and the time and date their duty commenced and Concluded * The premises should implement effective security policies to protect staff and customers from conflict, violence and threats in consultation with Sussex Police

	<p>and ensure staff are adequately trained on these policies. Training records must be accessible for review by police or the Licensing Authority.</p> <p>At all times the premises is open to the public, the management will contract the back up services of an approved mobile support unit (MSU) that operates at all times the premises is open to the public, with a minimum of 2 SIA registered Door Supervisors operating from it. A copy of the MSU contract will be retained at the premises and made available for immediate inspection upon request by Sussex Police or Council Officials. The MSU will be accredited by the Brighton Business Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.</p>
Business Crime Reduction Partnership (BCRP) membership	Premises will become a member of the BCRP or similar scheme approved by the Licensing Authority that operates with radios and uses the Nightsafe & Yellow Card Scheme or similar reporting scheme.
ID scanners	<p>The use of ID scanners where appropriate.</p> <p>The premises shall install a recognised electronic identification scanning system for customers entering the premises. The system shall be operated at all times door staff are on duty and all persons entering the premises will be scanned. The system should have the ability to identify the hologram of an ID and read both Passports and ID cards, including PASS cards. The system should be able to conduct tests to determine if a document is genuine or counterfeit. The system must be compliant with the Information Commissioners good practice guidance for ID scanning in clubs and bars.</p>
Equalities and inclusion policy	A comprehensive, documented equalities and inclusion policy framework that demonstrates the organisation's commitment to creating and maintaining a fair, diverse, and inclusive environment. This framework should encompass clear policies, procedures, and measurable objectives that actively promote equality of opportunity, prevent discrimination and harassment, and foster an inclusive culture where individuals from all backgrounds can feel safe. The policy must be regularly reviewed, updated to reflect best practice and legal requirements, and supported by appropriate training and monitoring mechanisms.
Safety of staff and customers	Licence holders should have comprehensive, clearly documented policies and procedures in place which systematically identify all public safety risks associated with their premises for both customers and staff, and detail the robust measures implemented to prevent, manage, and respond

	<p>effectively to those risks. These policies should encompass risk assessment methodologies, hazard identification protocols, emergency response procedures, staff training requirements, and regular review mechanisms to ensure ongoing compliance with health and safety legislation. The documentation must demonstrate a proactive approach to risk management, including contingency planning for various scenarios, clear allocation of responsibilities amongst staff members, and established communication channels for reporting and addressing safety concerns promptly and effectively.</p> <p>Licence holders should prepare themselves for the implementation of Martyn's Law.</p>
Safety of staff and customers	<p>Preparing for Martyn's Law Requirements</p> <p>Licence holders should familiarise themselves with the requirements of Martyn's Law (the Terrorism (Protection of Premises) Act 2025), which will require certain premises and events to consider how they would respond to a terrorist attack. While the Act will not come into force for at least 24 months, early preparation will help ensure compliance and enhance the safety and security of staff and visitors. The Government will publish guidance during the implementation period to assist in understanding the specific requirements.</p>
Safety for staff	<p>Licensed venues are encouraged to take all reasonable steps to support the safe travel of staff following late-night shifts, including the provision of free or subsidised transport home where appropriate, as part of their duty of care.</p>
Drinking receptacles	<p>The use of reusable plastic and polycarbonate drinking vessels and containers, especially outside areas or after specified hours.</p>
Vulnerability policies and training	<p>All persons working/trading in the night time economy will be aware of the vulnerability of patrons. Patrons are particularly vulnerable when intoxicated through alcohol and/or drugs, this includes when they are refused entry or ejected from the premises.</p> <p>There will be a special emphasis on safety, including measures to tackle drink spiking and unwanted sexual behaviour.</p> <p>Every venue will now need to have a clear and actionable policy in place to prevent and respond to drink spiking. This includes staff training, procedures for reporting incidents, and support for victims.</p>

	<p>Training and initiatives should include;</p> <ul style="list-style-type: none"> • Safety-First Door Policy: Venues will no longer be allowed to eject vulnerable individuals, especially lone adults, without care. Whether someone is intoxicated, separated from their group, or simply in need of help, venues must act responsibly. • Premises to contact the Night Safety Marshalls (NSMs) to assist vulnerable persons to get home safely and get the help they need during the NSM operating hours. • BCRP spiking and vulnerability training • Home Office Spiking training • Implementation of the 'Ask for Angela' scheme or similar initiatives • Training in the use of the Back Off Back Up (Bobu) app and displaying the sticker to show venues are part of the safety network – or similar schemes
Vulnerability policies and training	Awareness of child sexual exploitation, modern slavery and human trafficking indicators.
Drug Use	<p>* A zero tolerance policy to the use of drugs in the premises should be adopted.</p> <p>* Posters can be displayed throughout the premises to remind customers of the zero-tolerance policy.</p> <p>* Refusing entry to anyone who appears to be showing signs of drug use and contacting the emergency services in appropriate circumstances. In such cases, an entry should be made in an incident logbook.</p> <p>* A duty of care policy regarding persons suffering adversely from the effects of drugs should be in place at the premises and staff should be trained on the policy.</p>
Smoking on the premises	Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance, including in relation to enclosed (or substantially enclosed) smoking shelters.
Music, singing and speech noise breakout from the premise	<p>A noise management policy should be in place that sets out sound attenuation measures to prevent or</p> <p>control music, singing and speech noise breakout from the premises.</p>

Noise and nuisance from customers arriving and leaving the premises	<ul style="list-style-type: none"> * Reduce the potential for excessive queue lines with a well-managed and efficient door policy. * A customer dispersal policy can minimise noise disturbance to local residents from customers leaving the premises. A policy should clearly set out measures to avoid a mass exit at the end of the evening * Display prominent notices close to the exit doors, requesting patrons to leave the premises and quickly and quietly. * Display prominent signs in external areas such as beer gardens and forecourts asking customers to keep noise to a minimum. * Restrict the use of external areas after a certain time (e.g.10pm) if premises are in a residential area
Smokers outside the premises	<ul style="list-style-type: none"> * Limit the number of smokers permitted outside at any one time after a certain time. * Discourage smokers from loitering outside by not permitting them to take their drinks with them and removing external furniture after a certain time. * Locate smoking areas away from residential premises. * Do not permit customers to congregate on and block the public highway to passers-by
Noise and disturbance caused by deliveries, collections and waste disposal	<p>Commercial deliveries, collections and storage/ disposal of waste (especially glass), including beer deliveries, refuse collections and storage / disposal of waste and recyclables in external areas should be restricted between certain times</p>
Children accessing licensed premises	<p>A documented Safeguarding policy setting out measures to protect children from harm should be in place at the premises. The policy should consider all</p>

	<p>activities associated with the premises including the sale of alcohol and the provision of regulated</p> <p>entertainment and when children should be allowed on or restricted from the premises.</p> <p>* All staff including door staff and bar staff should be trained on the policy.</p>
Underage sales of alcohol	<p>The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.</p> <p>* Signage advertising the 'Challenge 25' policy will be displayed in prominent locations in the premises.</p> <p>*The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling, serving or delivering alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling, serving or delivering of such products and will include:</p> <p>a) The lawful selling of age restricted products – including but not limited to, the requirement of the staff member conducting the transaction to ensure they carry out Challenge 25 checks regardless of any other staff member checks that may already have taken place</p> <p>b) Identifying if a person may be intoxicated and refusal of sale</p> <p>c) Vulnerability initiatives and how to respond to potential drink spiking</p>

	<p>* Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 8 weeks, with the date and time of the verbal reinforcement/refresher training documented.</p> <p>* All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.</p>
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Note: The above best practice measures are not exhaustive and changes with wording, training providers and organisations may occur over time.

APPENDIX A1 – Alcohol Delivery Service

Conditions for consideration by any potential applicant may include (but are not exhaustive):

- Alcohol will only be delivered to residential and business addresses. The recipient will be required to show the requisite ID to ensure that they are clearly a resident or employed at the named delivery address. Alcohol will not be delivered to customers at a park, in an open space, the beach, a bus stop etc.
- Delivery riders must be instructed to abort delivery where that sale is believed to be a “street sale” or to an open space. All such instances will be recorded in the refusals/incidents log.
- The alcohol delivery service will be ancillary to the provision of takeaway food. All alcohol deliveries must be accompanied by an order for food, the food contingent of the delivery being a minimum of [£X].
- All orders received with an alcohol element will be for delivery only, there will be no collection facilities available from the premises.
- The company website through which alcohol is sold will have measures in place to prevent underage sales. This includes customers having to select/fill out a declaration that they are over 18 before purchasing online.
- All forms of advertising and promotional literature dealing with the delivery service (including internet sites and flyers/leaflets) will clearly and prominently state that alcohol will only be delivered together with an order for food, the food contingent of the total delivery being a minimum of [£X]. It will also advise of the premises ‘Challenge 25’ policy, which forms of approved ID will be accepted and that failure to show the required form of ID will result in non-delivery of the alcohol. This will be reiterated at the point of sale e.g. through an online ordering website/platform.
- All employees and agents of the premises or agents delivering orders will receive full advance training in selling alcohol, approved forms of ID and Challenge 25 policy as per condition [x] on the premises licence. All staff and agents will be fully trained and understand the company’s policy of non-delivery where approved ID is not available during final interaction with the customer.
- All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- A record of sales and deliveries will be kept and made available for inspection by the Police, Licensing Authority or officers from the Trading Standards team for 6 months from the date of delivery or refusal of alcohol.
- Where an order is taken for delivery by an employee of the premises to a customer,

all customers will sign a delivery note which will contain:

- a) A list of individual items delivered;
- b) The delivery address;
- c) The method of payment;
- d) The name of the person ordering and receiving alcohol;
- e) The date and time of delivery;
- f) If proof of age was asked for, confirmation of the type of proof of age document presented and accepted;
- g) The name of the employee or representative of the premises who made the delivery.

- For deliveries where the alcohol is delivered personally by the Designated Premises Supervisor, or their employees or agents (including Deliveroo couriers) where the DPS has direct supervision over them and in the event that the person ordering and paying for the alcohol nominates another person (the third party) as the recipient of the alcohol (as a gift etc) and the alcohol is to be delivered directly to the third party and not the person ordering and paying for the alcohol, then the person ordering and paying for the alcohol will be required to state as part of their order that the third party/recipient is aged over 18.

APPENDIX B - Licensing Enforcement Policy

1.0 STATEMENT OF OBJECTIVES

The council as licensing authority and responsible authority is committed to the council's priorities and will inform the enforcement actions taken. Amendments to priorities will be embedded automatically.

- 1.1 This service policy promotes efficient and effective approaches to regulatory inspection and enforcement that improve regulatory outcomes without imposing unnecessary burdens. This is in accordance with the Regulator's Compliance Code.
- 1.2 In certain instances the service may conclude that a provision in the code is either not relevant or is outweighed by another provision. It will ensure that any decision to depart from the code will be properly reasoned, based on material evidence and documented.
- 1.3 The service pursues a positive and proactive approach towards ensuring compliance by:
 - Supporting the better regulation agenda;
 - Helping make prosperity and protection a reality for the city's community;
 - Helping and encouraging regulated entities to understand and meet regulatory requirements more easily;
 - Responding proportionately to regulatory breaches; and
 - Protecting and improving public health and the environment.
- 1.4 This policy is based on the seven 'Hampton Principles' of:

Economic Progress: Regulators should recognise that a key element of their activity will be to allow, or even encourage, economic progress and only to intervene when there is a clear case for protection;

Risk Assessment: Regulators, and the regulatory system as a whole, should use comprehensive risk assessment to concentrate resources in the areas that need them most;

Advice and Guidance: Regulators should provide authoritative, accessible advice easily and cheaply;

Inspections and other visits: No inspection should take place without a reason;

Information requirements: Businesses should not have to give unnecessary information or give the same information twice;

Compliance and enforcement actions: The few businesses that persistently break regulations should be identified quickly and face proportionate and meaningful sanctions; and

Accountability: Regulators should be accountable for the efficiency and effectiveness of their activities, while remaining independent in the decisions they take.

- 1.5 The rights and freedoms given under the Human Rights Act, particularly Article 6 and 8, will be observed, as will the provisions of the Regulation of Investigatory Powers Act.

2.0 SCOPE OF THE POLICY

- 2.1 This policy supports and supplements specific guidance on enforcement action contained in the Statutory Code of Practice for Regulators, Brighton & Hove City Council's Corporate Enforcement Policy, Statutory Codes of Practice and relevant guidance documents and guidelines issued by government departments and coordinating bodies.
- 2.2 This policy relates to actions taken to educate and enforce legislation where noncompliance's have been identified or have a realistic potential to occur.
- 2.3 The policy is limited to those enforcement activities led by the Head of Regulatory Services.

3.0 TRAINING

- 3.1 Officers undertaking enforcement duties will be suitably trained and qualified so as to ensure they are fully competent to undertake their enforcement activities.

4.0 MANAGEMENT SYSTEMS

- 4.1 The service will maintain management systems to monitor the quality and nature of enforcement activities undertaken, so as to ensure, so far as is reasonably practicable, uniformity and consistency.

5.0 ENFORCEMENT OPTIONS

- 5.1 The service recognises the importance of achieving and maintaining consistency in its approach to enforcement. Statutory Codes of Practice and guidance issued by government departments, other relevant enforcement

agencies or professional bodies will therefore be considered and followed where appropriate.

5.2 Sanctions and penalties will be consistent, balanced, fairly implemented and relate to common standards that ensure individual's, public safety or the environment is adequately protected. The aim of sanctions and penalties are to:

- Change the behaviour of the offender;
- Eliminate any financial gain or benefit from non-compliance;
- Be responsive and consider what is appropriate for the particular offender and regulatory issue, which can include punishment and the public stigma that should be associated with a criminal conviction;
- Proportionate to the nature of the offence and the harm caused; and
- Aim to deter future non-compliance.

5.3 Criteria to be taken into account when considering the most appropriate enforcement option include:

- the potential of the offence to cause harm;
- confidence in the offender; 45
- consequences of non compliance;
- likely effectiveness of the various enforcement options.

5.4 Having considered all the relevant options the choices for action are:

- **Informal Warning:** All advice issued will be given in writing and specify the nature of the breach or offence, and the actions required to remedy the issue. An informal warning may be included with the advice, and may accompany higher-level actions, such as Enforcement Notices or Voluntary Surrender:
- **Licence review:** Licence review power will be used where an application for review relates to one or more of the licensing objectives.
- **Taxi licence:** Taxi licence suspension or revocation will be used to protect public safety. Other sanctions such as Driving Standards Agency (DSA) testing will be used to protect public safety and in accordance with the taxi licensing policy (Blue book).
- **Simple Caution:** The issue of a Simple Caution by an authorised officer may be undertaken as an alternative to prosecution where it is considered unnecessary to involve the courts, and the offender's response to the problem makes repeat offending unlikely, or the offender's age or health make it appropriate. Cautions may only be issued where the offender makes a clear and reliable admission of guilt and understands the significance of acceptance.
- **Prosecution:** A prosecution is appropriate where there is a breach of a legal requirement, such that public safety, health, economic or physical well-being or the environment or environmental amenity is adversely affected.

The Crown Prosecutor's Code of Evidential and Public Interests tests must be met in all cases. However, certain circumstances will normally justify prosecution to prevent the undermining of the service's enforcement responsibilities.

- Failure to comply with an Enforcement Notice
- Declining a Simple Caution
- Continued, reckless, negligent or pre-meditated non-compliance.
- Failure to pay a fixed penalty.
- Non-cooperation, acts of obstruction or threats of physical harm or abuse.
- **Injunctions:** Injunctive action as a means of preventing an activity or course of action likely to result in significant risk to public or community safety or economic wellbeing of consumers and businesses.

5.5 If the department is considering taking enforcement action which it believes may be inconsistent with that adopted by other authorities, the matter will be referred to the appropriate local co-ordinating body.

6.0 INFORMAL WARNING

6.1 Informal action may be taken when:

- the act or omission is not serious enough to warrant formal action, or
- from the individual's/enterprise's past history it can be reasonably expected that informal action will achieve compliance, or
- confidence in the individual/enterprise's management or ability to resolve the matter is high, or
- the consequences of non-compliance will not pose a significant risk to public health, public safety, animal welfare or the environment.

6.2 When an informal approach is used to secure compliance with regulations, written documentation issued will:

- contain all the information necessary to understand what is required and why;
- indicate the regulations contravened, measures which will enable compliance with legal requirements and that other means of achieving the same effect may be chosen;
- clearly differentiate between legal requirements and recommendations of good practice. Such a differentiation will also be made when verbal advice is given.

7.0 SIMPLE CAUTIONS

7.1 A Simple Caution may be issued as an alternative to a prosecution. Cautions may be issued to:

- deal quickly and simply with less serious offences;
- divert less serious offences away from the courts;
- reduce the chances of repeat offences.

- 7.2 The following factors will be considered when deciding whether a caution is appropriate:-
- evidence of the suspect's guilt
 - has a clear and reliable admission of the offence been made either verbally or in writing
 - is it in the public interest to use a caution as the appropriate means of disposal when taking into account the public interest principles set out in the Code for Crown Prosecutors.
 - the suspected offender must understand the significance of a simple caution and give an informed consent to being cautioned.
- 7.3 No pressure will be applied to a person to accept a Simple Caution.
- 7.4 The 'cautioning officer' will be the most appropriate officer from Service Director, Service Assistant Director, Head of Service, Environmental Health Manager or Licensing Manager. The Cautioning Officer must not have taken an active part in investigating the case.
- 7.5 Should a person decline the offer of a simple caution a prosecution will be recommended.

8.0 PROSECUTION

- 8.1 The department recognises that the decision to prosecute is significant and could have far reaching consequences on the offender.
- 8.2 The decision to undertake a prosecution will be taken after proper consultation in accordance with the Scheme of Delegation for the council's functions. The decision to proceed with a prosecution will normally be taken following legal advice. The matters to be taken into account when deciding if the issue of proceedings is proportionate include:
- the seriousness and nature of the alleged offence;
 - the role of the suspect in the commission of the offence;
 - any explanation by the suspect or any agent or third party acting on their behalf;
 - was the suspect in a position of trust, responsibility or authority in relation to the commission of the offence;
 - is there evidence of premeditation or disregard of a legal requirement for financial reward;
 - risk of harm to the public, an individual or the environment;
 - relevant previous history of compliance;
 - reliability of evidence and witnesses
 - any mitigating or aggravating circumstances or the likelihood that the suspect will be able to establish a defence;
 - suspect's willingness to prevent a recurrence of the offence;
 - the need to influence future behaviour of the suspect;
 - the likely penalty to be imposed; and

- prosecution is in the public interest, there is realistic prospect of conviction and sufficient evidence to support proceedings.

8.3 All relevant evidence and information will be considered before deciding whether to instigate proceedings in order to enable a consistent, fair and objective decision to be made.

8.4 Where an act or omission is capable of constituting both a summary and either way offence, when deciding which offence to charge the following will be considered:

- the gravity of the offence;
- the adequacy or otherwise of the powers of the summary court to punish the offence;
- the record of the suspect;
- the suspect's previous response to advice or other enforcement action;
- the magnitude of the hazard; • any circumstances causing particularly great public alarm;
- comments from the council's Solicitor's Office.

8.5 As a general rule an individual or business will be given a reasonable opportunity to comply with the law although in some circumstances prosecution may be undertaken without giving prior warning, e.g.

- the contravention is a particularly serious one;
- the integrity of the licensing framework is threatened.

9.0 Home Office and Government Advice: Problem premises on probation

9.1 The licensing authority supports the strategies of interventions and tough conditions to be assembled into packages released in 2008. The current version is appended (Annex B).

10. APPEALS

If any person is unhappy with the action taken, or information or advice given they will be given the opportunity of discussing the matter with the relevant team manager, Head of Service or Assistant Director. Any such appeal does not preclude any aggrieved person from making a formal complaint about the service or any officers. Any such complaint will be dealt with in accordance with corporate procedures and guidance.

Complaints that are not dealt with by the council's complaints procedure are listed in corporate policy and include:

- Complaints where the complainant or another person has commenced or intends to commence legal proceedings against the council.
- Complaints where the council has commenced or intends to commence legal proceedings against the complainant or another person relating to the matter of complaint.

11. SHARED ENFORCEMENT ROLES

Lead agency status between Sussex Police, East Sussex Fire and Rescue Service and the council's trading standards, environmental health and licensing officers are determined between the agencies at county level. The current position is appended (appendix D).

ANNEX A

“PROBLEM PREMISES ON PROBATION” – RED AND YELLOW CARDS: HOW IT WOULD WORK

The problem

1. In many cases, revocation of a premises licence effectively kills any business which is focused on retailing alcohol. This means that not only the business owner suffers, but most people working there will lose their livelihoods. Many of these workers will be entirely innocent of any wrong-doing. There is also an impact on those who rely indirectly on income from the premises – such as local food suppliers or cleaning contractors, and the closure of a premises can deprive some communities of their local shop or restrict local consumer choice. Enforcement agencies that apply for reviews and local councillors sitting on licensing committees are well aware of this potential impact and it can lead to a reluctance to use the powers in the act to revoke the licence instantly for any failure to promote the licensing objectives. This risks patchy enforcement and uneven solutions to alcohol related problems around the country.
2. In addition, in many cases, enforcement agencies will prefer to negotiate additional voluntary conditions with problem premises against the threat of review as an immediate, pragmatic and less bureaucratic solution. While this may be a reasonable approach in many cases, there is a risk that some premises are not being dealt with as firmly as necessary, particularly given the level of test purchase failures. Nor are voluntary agreements particularly visible, lessening the deterrent effect on other premises.
3. Government wishes to support the enforcement agencies and licensing authorities by providing clear guidance on a “yellow card / red card” system, which would ensure a firm response to problems, but which give premises an opportunity to

reform. The intention is that such a system would be highly visible and send a clear message to alcohol retailers, and the public, that action will be taken against those who act contrary to the licensing objectives and the law.

4. The proposed interventions below would not prevent the giving of an instant red card in an appropriately serious case. It should be realised that a “test purchase” failure often masks multiple offences that have gone undetected.

Supporting enforcement agencies

5. The government will encourage enforcement agencies – mainly the police, trading standards officers and environmental health officers – to seek more reviews in the knowledge of the yellow card/red card system described below. This will mean not giving formal warnings. It will mean that on identifying problem premises, the licensing authority will be engaged faster than it might have been in the past.
6. Enforcement agencies would be encouraged to seek reviews when local intelligence suggests that individual premises are selling to children or causing other crime problems or causing noise nuisance.
7. Under the law, the licensing authority must then hold a hearing so long as the application relates to one of the four licensing objectives and is made by a responsible authority or by other persons like a local resident or another local business.

First intervention

8. Responsible authorities will be encouraged to propose a package of touch new conditions to be added to the existing conditions which are designed to combat the identified problem. The kinds of conditions that we have in mind are set out in Annex A. These would not be appropriate for every premises and need to be tailored to the nature of the problem and the type of premises. Such action should be supplemented where appropriate by:
 - Removal of the designated premises supervisor and his/her replacement (the manager is removed);
 - Suspension of the licence for between one day and three months according to the circumstances.
 - Restriction on trading hours – cutting hours of trading in alcohol.
 - Clear warning that a further appearance will give rise to a presumption of revocation.
9. If appropriate following review, the licensing authority should consider these packages of conditions and actions to challenge problem premises more aggressively.

10. For example, requiring a major supermarket to make all alcohol sales through a single till manned by a person aged 25 years or older in order to tackle sales to underage. Over a year, this would potentially cost such a supermarket £millions. It would also make them reflect on their levels of supervision at other stores.
11. In addition, enforcement agencies should make the premises in question a priority for test purchases and more regular inspections.
12. The aim would be to put the premises on probation. Effectively, they are given a yellow card. They are put on notice that the next offence or breach would mean an automatic second intervention – a red card.

Second intervention

13. In the absence of improvement, enforcement agencies should seek another review. The licensing authority again must grant a hearing.
14. If satisfied on the issue of the lack of improvement, the licensing authority should look to revoke the licence. The action should be publicised in the area as an example to other retailers.

Implementation

15. Requires:
 - Development with the Home Office of a toolkit and guidance for police, trading standards and ethos;
 - Initial letters to Leaders of local authorities and Chief Executives;
 - Ultimately, stronger statutory Guidance to be laid in Parliament for licensing authorities themselves.
16. Central Government cannot tell licensing authorities what to do. The review powers are devolved to them. Similarly, central government cannot direct enforcement agencies how to enforce the law. It would remain their judgement when and how to act.

ANNEX B

POSSIBLE TOUGH CONDITIONS TO BE ASSEMBLED INTO PACKAGES

n.b. These would not be appropriate for every premises and need to be tailored to the nature of the problem and the type of premises.

GREATER CONTROL OVER SALE

1. Designated checkout(s) for alcohol sales (supermarket). Impact on protection of children from harm, but also impact on sales and goodwill (probable loss of trade to competitors).
2. Personal licence holder/DPS to be on site at all times during sales of alcohol. Impact on protection of children from harm and new costs if additional staff have to qualify as personal licence holder.
3. Personal licence holder/DPS to supervise and authorise every individual sale of alcohol. Impact on protection of children from harm and new costs if additional staff have to qualify as personal licence holder.
4. SIA registered security staff to be present at points of sales to support staff refusing sales to u-18s and drunks.
5. Alcohol sales only to be made only by person aged not less than 25 years. Impact on protection of children from harm, but also impact on sales and goodwill (probable loss of trade to competitors).
6. CCTV installed at all points of sale and recorded. Recordings can be examined by a constable or trading standards officer to determine sales to minors or intoxicated persons.
7. The licensed premises shall join the Business Crime Reduction Partnership scheme.

TRAINING

8. All staff to read and sign a declaration that they understand the law every time they start a shift.
9. Train all staff engaged in selling alcohol in alcohol awareness (not just personal licence holders). All new staff to be trained within two weeks of commencing employment. Evidence of training to be retained in writing and to be available for inspection by any authorised person and training standards officers. Impact on all licensing objectives.

ALCOHOL SALE BANNED AT CERTAIN HOURS

10. No alcohol sales Mon – Fri between 4pm and 8.30pm. Impact on protection of children from harm or targeted hours reflecting times when local intelligence indicates under 18s may be purchasing alcohol.
11. No alcohol sales – Friday to Sunday. Impact on all four licensing objectives.

ALCOHOL DISPLAYS

12. No displays of alcohol or advertising of alcohol promotions that can be seen from outside the premises.
13. No alcohol stocks promoted alongside goods likely to appeal to children (eg confectionary, toys).

CUTTING DOWN ON SHOPLIFTING

14. SIA registered security staff to be present at alcohol aisles during opening times to prevent attempted under age sales or theft.
15. Location of alcohol stocks/displays not to be sited near the entrance/exit to deter shoplifting.
16. No direct public access to alcohol products – like tobacco, alcohol to be kept behind a dedicated kiosk.

NAMING AND SHAMING

17. Display an external sign/yellow card to state which of the licensing act objectives they have breached and what action has been taken against them.

OTHERS

18. Maintain a log of all under age attempted purchases from those who appear to be under 18 or drunk.
19. Children aged under [18 years] not to be present or (not more than one child at any one time) on premises (other than children living on the premises or of the people working on the premises); or only children under 18 accompanied by an adult to be permitted on the premises during retailing hours. Impact on protection of children from harm.
20. Products to be labelled (a label stuck to the bottle or can) to show the details of the shop from which it was bought. Purpose would be to provide evidence of unlawful sales if product found commonly in possession of persons under
21. Designated single items – beer, alcopops and cider – not to be sold to any person. Impact on protection of children from harm. Purpose would be to reduce sales to children and drunks. Alternative would be to prescribe sales of beer, alcopops and cider in quantities of less than four.

22. CCTV installed, monitored and 24 hour recordings kept for a week and made available to constables and persons authorised under the 2003 Act to help identify attempted proxy purchasing.
23. Where there is no designated smoking area, readmission after midnight should normally be prohibited.

APPENDIX C – Film Classification Policy

- 1.1 The British Board of Film Classification (BBFC) and the Licensing Authority are the classification bodies for films shown in the city, and as such has the right to issue film classifications to films that are shown in premises such as cinemas and film festivals. The Licensing Authority can be requested to classify a film that has not yet been classified by the BBFC. A typical example of this would be a locally made film, such as a student production, to be shown at a film festival in the borough.
- 1.2 Under the Licensing Act 2003 any premises that has permission to show films as part of their permitted licensable activity, such as a cinema, has mandatory conditions attached to the licence regarding the exhibition of films.
- 1.3 Any classification issued by the Licensing Authority only applies when the film is exhibited within the city, and does not effect the classification in other areas.
- 1.4 A decision will be made at an officer level regarding the classification to be issued. This decision will be based on the BBFC guidelines. In sensitive cases, officers would consult with the Chair or Deputy.
- 1.5 Classification Requirements when films are not viewed in advance

Requests for an 18 certificate classification requirements be determined on an officer basis subject to the conditions shown below. An 18 certificate would be issued based only on the synopsis of the film and would be appropriate in the following cases:

(a) A film festival
(b) A one off screening of a film
(c) A trailer for a film
- 1.6 Any request to classify a film will be considered by the licensing authority and must be accompanied by both the synopsis of the film and a full copy of the film in DVD or video format.
- 1.7 All requests must be made with a minimum of 7 days notice of the proposed screening or 28 days for multiple requests.

Mandatory Conditions - Licensing Act 2003

The conditions detailed below are mandatory conditions required to be placed on all Premises Licenses where the showing of films is authorised under the Licensing Act 2003

Exhibition of films

S 20; mandatory condition: exhibition of films

- the admission of children is to be restricted in accordance with the following
 - (a) where the film classification body is specified in the licence, unless subsection (3) (b) of S 20 applies, admission of children must be restricted in accordance with any recommendation made by that body
 - (b) where the film classification body is not specified, or [(S20 (3)(b)] the relevant licensing authority has notified the holder of the licence that this subsections applies to the film in question, admission of children must be restricted in accordance with any recommendation made by that licensing authority.

Additional Conditions Attached to Cinema Licences

Conditions Attached to an 18 Certificate Film Classification. Requirements where films have not been viewed in advance.

The conditions listed below are attached by BHCC on all waivers to the film classification requirements:

1. The films must not encourage or incite crime; or lead to disorder; or stir up hatred against any section of the public in Great Britain on grounds of colour, race or ethnic or national origins, sexual orientation or sex; or promote sexual humiliation or degradation of or violence towards women.
2. The films must not have the effect such as to tend to deprave and corrupt persons who see them.
3. The films must not contain a grossly indecent performance thereby outraging the standards of public decency.
4. Persons under the age of 18 must not be admitted to any such film exhibitions

APPENDIX D - Lead Agency Status

Offence / Issue	Police	Local / Licensing Auth	Fire & Rescue	Trading Standards
<u>Licensing Objective 1:</u> Crime and Disorder				
Offences of failing to notify changes in details <i>Section 33(6) Licensing Act 2003</i>		Lead		
Offences of failing to display licences or certificates <i>Section 57(4) Licensing Act 2003</i>		Lead		
Unauthorised use of premises for licensable activities <i>Section 136 Licensing Act 2003</i>	Shared Lead	Shared Lead		
Exposing alcohol for unauthorised sale <i>Section 137 Licensing Act 2003</i>	Shared Lead	Shared Lead		
Keeping alcohol on premises for unauthorised sale <i>Section 138 Licensing Act 2003</i>	Shared Lead	Shared Lead		
Allowing Disorderly Conduct on Licensed Premises <i>Section 140 Licensing Act 2003</i>	Lead			
Obtaining/supplying alcohol to drunk <i>Sections 141 / 142 Licensing Act 2003</i>	Lead			
Failure to leave licensed premises <i>Section 143 Licensing Act 2003</i>	Lead			
Keeping of smuggled goods <i>Section 144 Licensing Act 2003</i>	HMRC&E	HMRC&E		
False statements made for purposes of the Act <i>Section 158 Licensing Act 2003</i>	Shared Lead	Shared Lead		

<p>Enforcement of closure order</p> <p><i>Section 169 Licensing Act 2003 (reappeared by the Anti-Social Behaviour Crime and policing Act 2014)</i></p>	Lead			

Offence / Issue	Police	Local / Licensing Auth	Fire & Rescue	Trading Standards
<p>Prohibition of alcohol sales at service / garage areas</p> <p><i>Section 176 Licensing Act 2003</i></p>	Shared Lead	Shared Lead		
<p>Public Drunkenness</p> <p><i>Section 12 Licensing Act 1872</i></p>	Lead			
<p>Underage drinking</p> <p><i>Section 169 Licensing Act 1964</i></p>	Shared Lead			Shared Lead
<p>Misuse of Drugs</p> <p><i>Section 4 Misuse of Drugs Act 1971</i></p>	Lead			
<p>Anti Social Behaviour</p> <p><i>Section 1 Crime & Disorder Act 1998 (reappeared by the Anti-Social Behaviour Crime and policing Act 2014 (ASBO))</i></p>	Shared Lead	Shared Lead		
Acceptance of accredited proof of age cards				Lead
Provision of effective CCTV in and around premises	Lead			
Employment of SIA licensed door staff	Shared Lead	Shared Lead		
Failure to comply with CCTV conditions	Shared Lead	Shared Lead		
Employment of SIA licensed door staff	Shared Lead	Shared Lead		
Requirements to provide toughened or plastic glasses	Shared Lead	Shared Lead		
Provision of secure deposit boxes for confiscated items (sin bins)	Shared Lead	Shared Lead		
Provision of litterbins, other security measures such as lighting	Shared Lead	Shared Lead		

<u>Licensing Objective 2:</u> Public Safety:	Police	Local / Licensing Auth	Fire & Rescue	Trading Standards
Sales of alcohol on vehicles <i>Section 156 Licensing Act 2003</i>	Lead			
Overcrowding of premises	Shared Lead	Shared Lead	Primary Lead	
Use of special effects such as lasers, pyrotechnics, smoke machines and foam		Shared Lead	Shared Lead	
Blocked or locked means of escape		Shared Lead	Primary Lead	
Provision of sufficient number of people employed to secure safety of patrons	Shared Lead	Shared Lead		
Regular testing and certification of systems and appliances		Shared Lead	Shared Lead	

<u>Licensing Objective 3: Public Nuisance:</u>				
Public nuisance from noise		Lead		
Public nuisance from litter		Lead		
Public nuisance from persons leaving the premises	Shared Lead	Shared Lead		
Public nuisance from odour		Lead		
Effective public transport		Lead		
Adequate public lighting/security lighting		Lead		

<u>Licensing Objective 4:</u> Protection of Children from harm:	Police	Local / Licensing Auth	Fire & Rescue	Trading Standards
Exposure to explicit films/plays <i>Sections 74 & 76 Licensing Act 2003</i>		Lead		
Requirements for children to be accompanied by an adult <i>Section 145 Licensing Act 2003</i>	Shared Lead	Shared Lead		
Sale of Alcohol to Children <i>Section 146 Licensing Act 2003</i>	Lead On licence			Lead Off licence
Sale of liqueur confectionery to children under 16 years <i>Section 148 Licensing Act 2003</i>	Lead			
Purchase, acquisition or consumption of alcohol by or for children <i>Sections 149 & 150 Licensing Act 2003</i>	Lead			
Delivering to or sending a child to obtain alcohol <i>Sections 151 & 152 Licensing Act 2003</i>	Lead			
Unsupervised sales by children <i>Section 153 Licensing Act 2003</i>	Lead			
Confiscation of sealed containers of alcohol and unsealed <i>Confiscation of Alcohol (Young Persons) Act 1997</i>	Lead			
Provision of sufficient number of staff to secure protection of children from harm <i>Section 12(1) Children and Young Persons Act 1933</i>	Shared Lead	Shared Lead	Shared Lead	
Concerns of moral/psychological harm	Shared Lead	Shared Lead		
Concerns over physical harm	Shared Lead	Shared Lead	Shared Lead	
Exposure to drugs, dealing or taking	Lead			
Exposure to gambling	Shared Lead	Shared Lead		

Exposure to activities of adult/sexual nature	Shared Lead	Shared Lead		
Exposure to incidents of violence/disorder	Lead			
Exposure to environmental pollution such as noise or smoke		Lead (with HSE)		
Exposure to special hazards i.e. suitability of the premises		Shared Lead	Shared Lead	
Limitation on hours when children may be present on all or parts of premises	Shared Lead	Shared Lead		
Exclusions by age when certain activities are taking place		Lead		

Appendix E

Sussex Police Crime Data Set for BHCC Statement of Licensing Policy **2025 Review**

Operation Marble

Due to the large concentration of licensed premises and night clubs in the centre of Brighton, a high proportion of the Division's violent crime and serious sexual offences are committed within a relatively small area. The Division receives a large influx of visitors to the city centre at weekends. Many of these people attend the pubs and night-clubs during nighttime hours and as a result an enhanced policing operation (with Directed Patrol Activity – DPA) is provided, called Operation Marble.

Op Marble covers an area between Preston Street to the West – The Level to the North – Kemptown to the East and the seafront between West Pier and Concorde 2 to the South. This covers the area previously designated as the Cumulative Impact Zone (now referred to as the City Safety Area) and is regularly under review to ensure that limited Police resources are being used to their optimum.

The emphasis of Op Marble is a highly visible presence of officers deployed on foot as well as focus on regularly updated hot spots (produced using live crime and incident data) to help reduce the risk of violent crimes. It runs on a Friday and Saturday night in response to pressures from the Nighttime Economy as with later opening pubs, bars, clubs and late-night refreshment premises, an increase in crime (particularly violent crime associated with alcohol) is seen in the earlier hours of the morning.

Several supporting initiatives run alongside the Police during the Op Marble time frame including:

- BCRP NTE briefing (Friday nights)
- Safe Space
- Night Safety Marshalls
- Beach Patrol
- Taxi Marshalls

Standalone operations still exist to cover significant events in the calendar such as the Halloween weekend, Bank Holidays, Christmas, New Year's Eve and Pride in order to reduce risk with an adjusted Police presence/response. Post Covid-19 has seen some shifts in how people go out and enjoy themselves in the Night Time Economy and the scope of data considered for the police analysis does not cover any periods of lockdown; beginning from 1st January 2022.

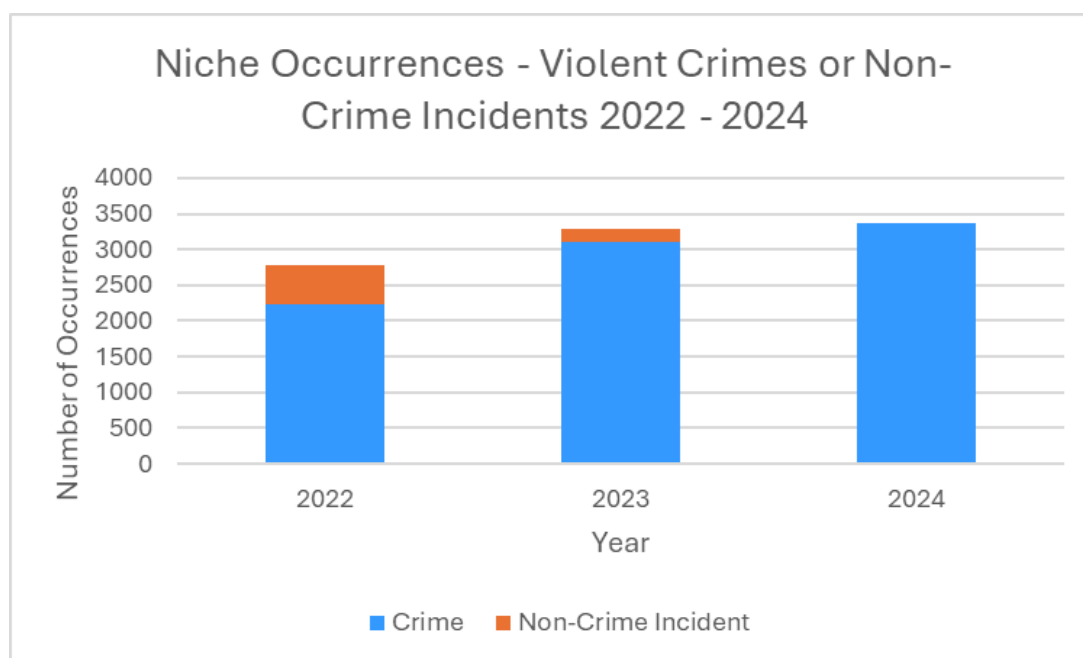
The data analysis (as included below – Graph 1) has shown that between 2022 – 2024 there has been a year-on-year increase in violent occurrences both during the hours covered by Operation Marble and within the non-Marble hours data sets. Police data confirms that the hotspot of violent occurrences and intoxication continues to be focused

within the city centre where there are high volumes of licensed premises, hospitality and nighttime economy venues.

Based on Sussex Police Beat areas the highest volumes of violent crimes and intoxication between 01/01/2022 – 31/12/2024 are shown in Map 1 below. These were in Regency (CC1003) where there were 2292 violent occurrences involving intoxication, St Peters & North Laine (CC1004) with 1609 occurrences and Queens Park (CC2005) with 1094 occurrences. This map is inclusive of all occurrences within both the Operation Marble DPA timings and the non-Marble days and hours over the 3-year period.

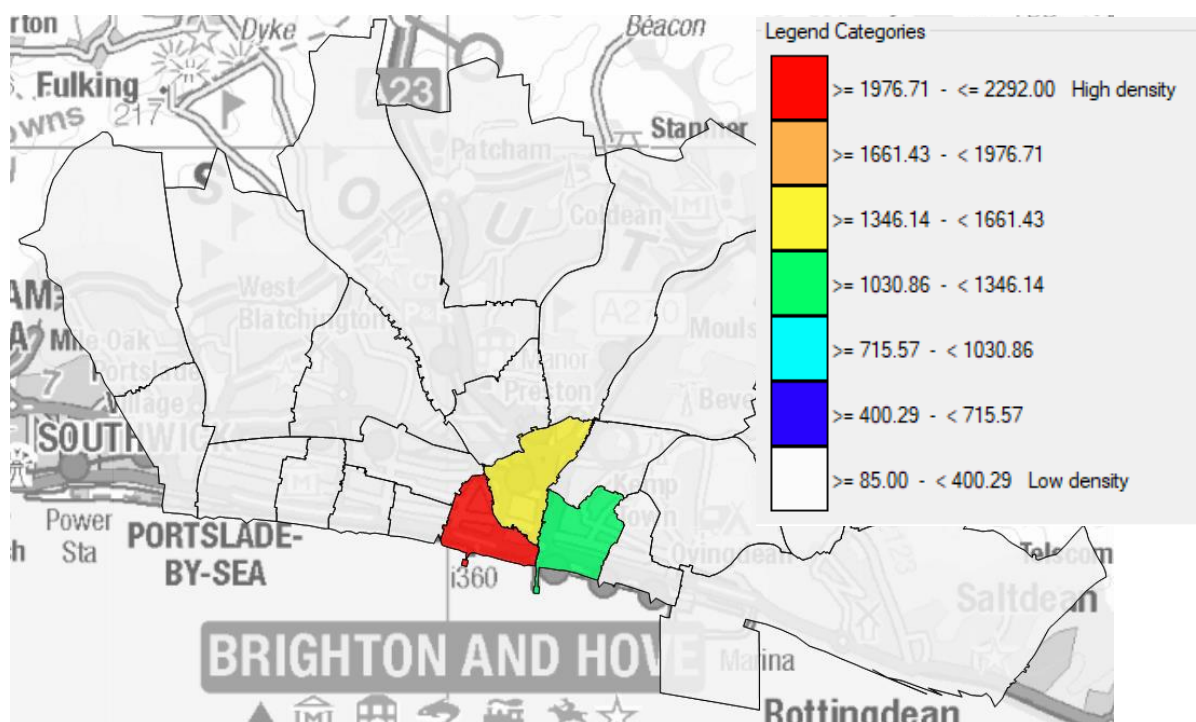
Graph 1: Overall Violent Occurrences & Intoxication in Brighton & Hove 2022-2024

All occurrences have either 'ALC' or 'DRG' Class NICL or the Substance Use field contains: 'affected by alcohol', or 'affected by drink and drugs', or 'affected by drink or drugs', or 'affected by drugs'. Further caveats to the data can be found at Appendix A.



Map 1: Overall Violent Occurrences & Intoxication in Brighton & Hove 2022-2024

Caveat to be mentioned - the below map will only capture occurrences where eastings and northings of an address were completed. Therefore, there will be some occurrences missing from the map.



Further analysis shows that overall, there was an increased risk of violent occurrences and intoxication in the evening hours and the early hours of the morning both during the Marble DPA timings and outside the Marble DPA hours (as shown in Tables 1a-c and 2a-c). There is a similarity of increased risk hours and the hotspot location for both the data set timings evidencing that there is a continual risk of violence and intoxication throughout the week. The caveats for the data used are provided at the end of this document (Appendix A).

Hotspot Maps and Police analysis to support continuation of the current focus and footprint of a Special Policy covering the city centre within the Statement of Licensing Policy

Data was drawn from Police systems to cover two distinct time frames:

- 1. Op Marble DPA (Directed Patrol Activity) Data** – any violent occurrences based on the search criteria that occurred between Friday 19:00 – 07:00hrs Saturday and Saturday 19:00hrs – 07:00hrs Sunday.
- 2. Non-Marble Data** – any violent crimes based on the search criteria that occurred outside of the Op Marble timings. Crimes where the time frame was over a long period were also included, meaning there is a likely chance that the offence may have occurred during Op Marble times but is not specified e.g. Thursday 21:00hrs – Monday 08:30hrs – there is a realistic probability it could have occurred during either Marble or Non-Marble hours.

A search of police crime data recording systems was completed by an analyst searching the date actual from '01/01/2022 – 31/12/2024', the area division 'Brighton and Hove', the Home Office Crime Group 'Violent Crime', the Class NICL (National Incident Category List) 'ALC' or 'DRG', or the Substance Use field equal to 'affected by alcohol', or 'affected by drink and drugs', or 'affected by drink or drugs', or 'affected by drugs'. Domestic abuse occurrences were included in both data sets. All caveats for the data and sources can be found at Appendix A at the end of this document.

A number of maps are included below to demonstrate crime hot spots within the city centre and how the current special policy areas (Cumulative Impact Zone - CIZ and Special Stress Area – SSA) relate to these.

These hotspot maps support the continuation of the current location and boundaries of the BHCC special policy as they can be seen to encompass the violent crime hotspots both within the nighttime economy timings (Op Marble) and outside of them e.g. daytime during the week. These peaks of risk may be explained in part by student nights as well as social changes e.g. the increased popularity of going out on a Thursday evening.

Key to Maps

The squares represent an individual event of crime during the time period mentioned. Each square = one violent crime.

Red squares indicate crimes during the Op Marble timings and blue squares indicate crimes outside the Op Marble timings.

The colours overlaid on the maps represent crime number density as follows:

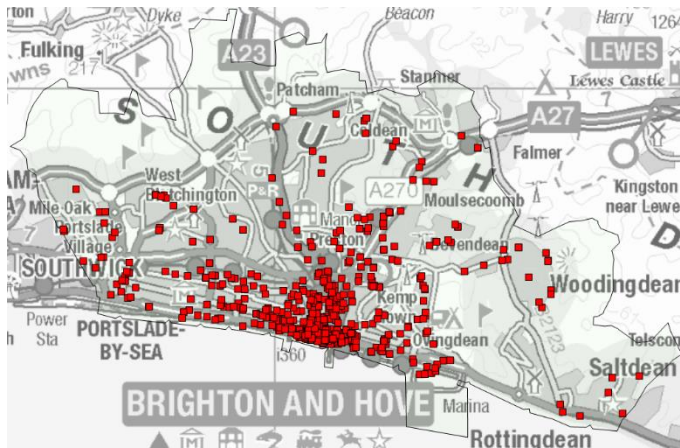


The current footprints of the existing Cumulative Impact Zone (CIZ) are shown on the close-up maps with a blue line and the Special Stress Area (SSA) with a purple line. Please note these maps are not to an exact scale and are used for illustrative purposes only.

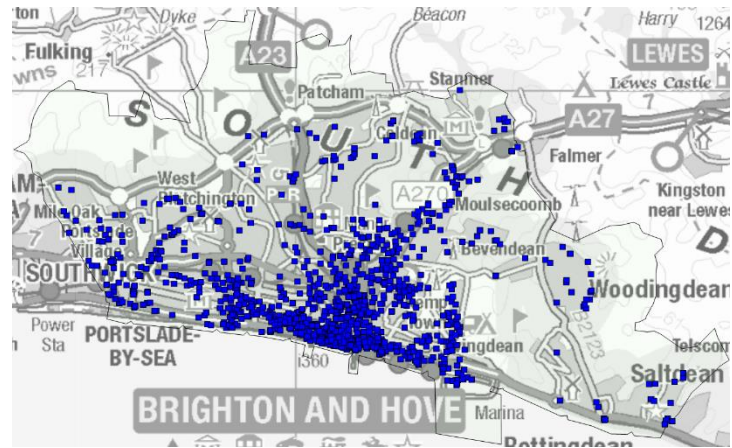
2022

City Wide Crime

Op Marble Timings

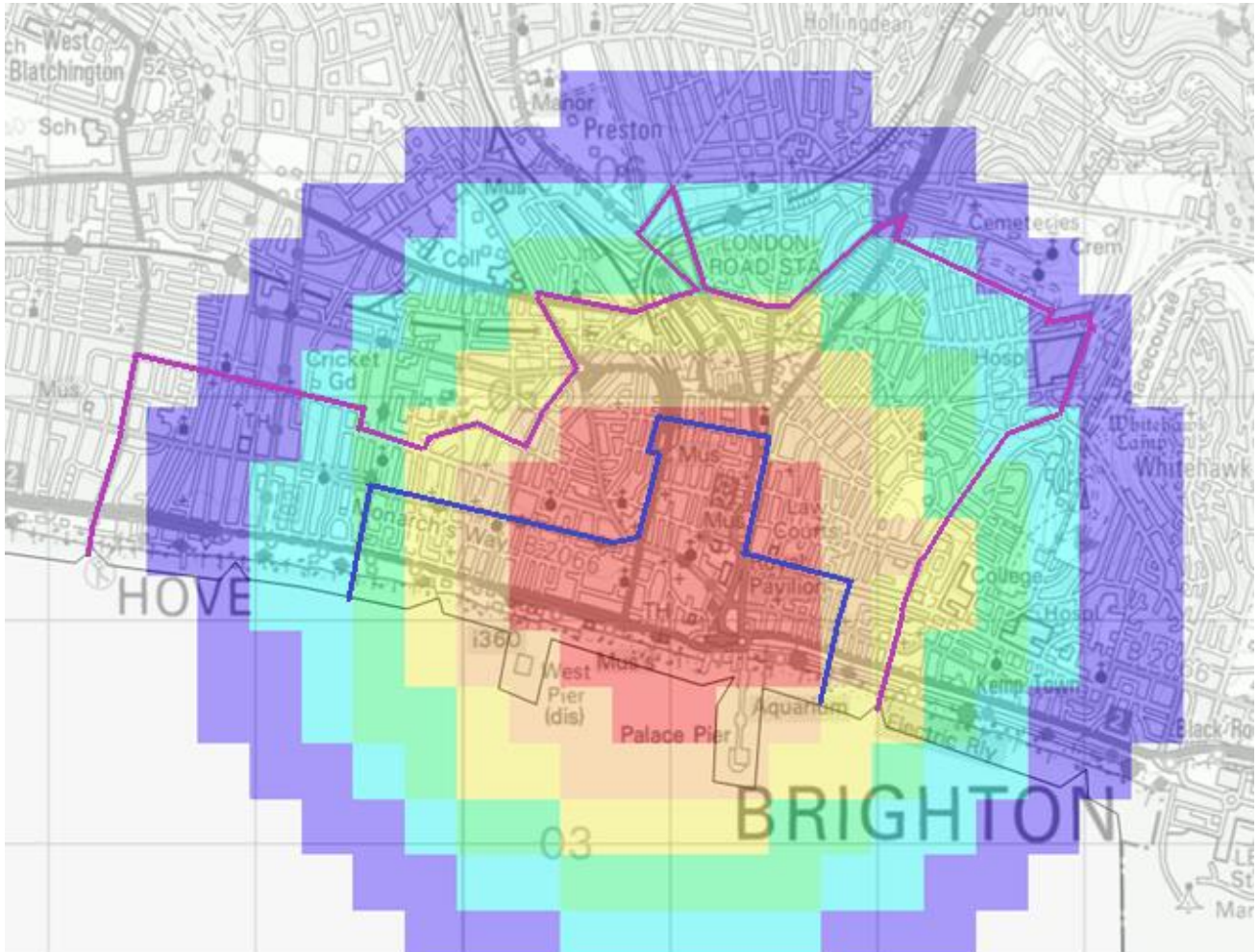


Non-Marble Timings

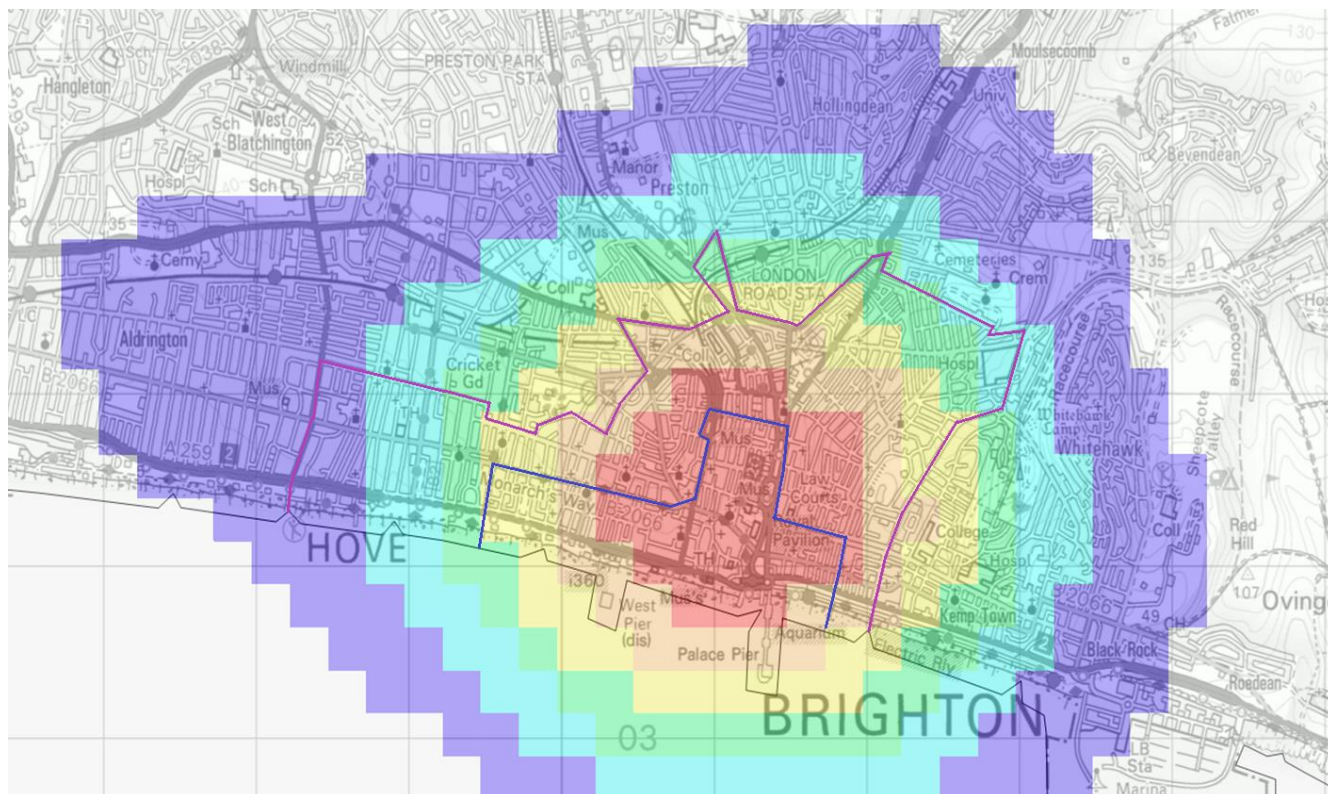


City Centre Crime Hotspot

Op Marble Timings



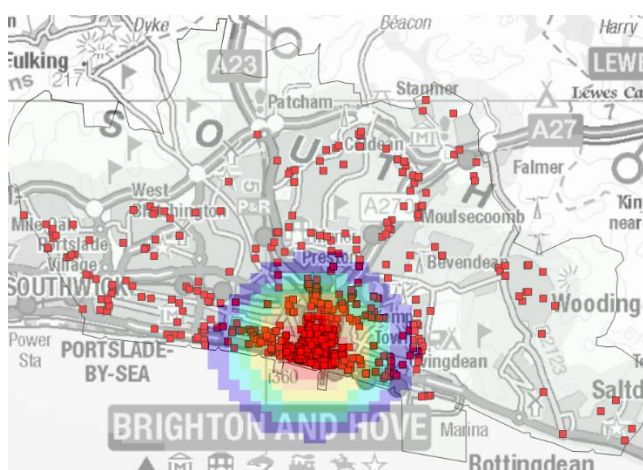
Non-Marble Timings



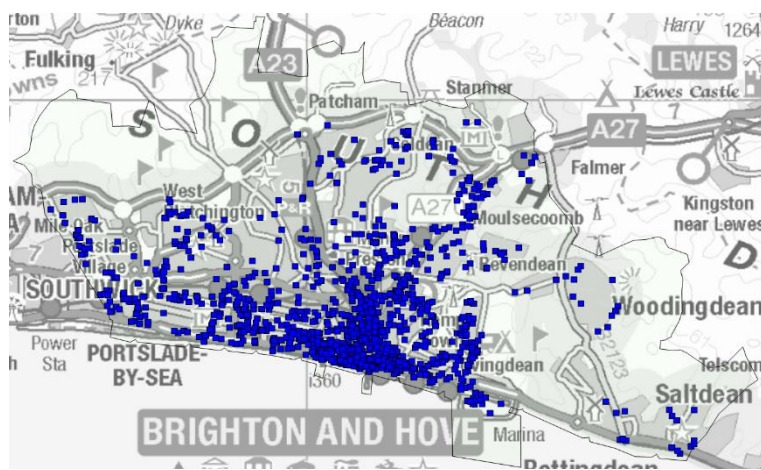
2023

City Wide Crime

Op Marble Timings

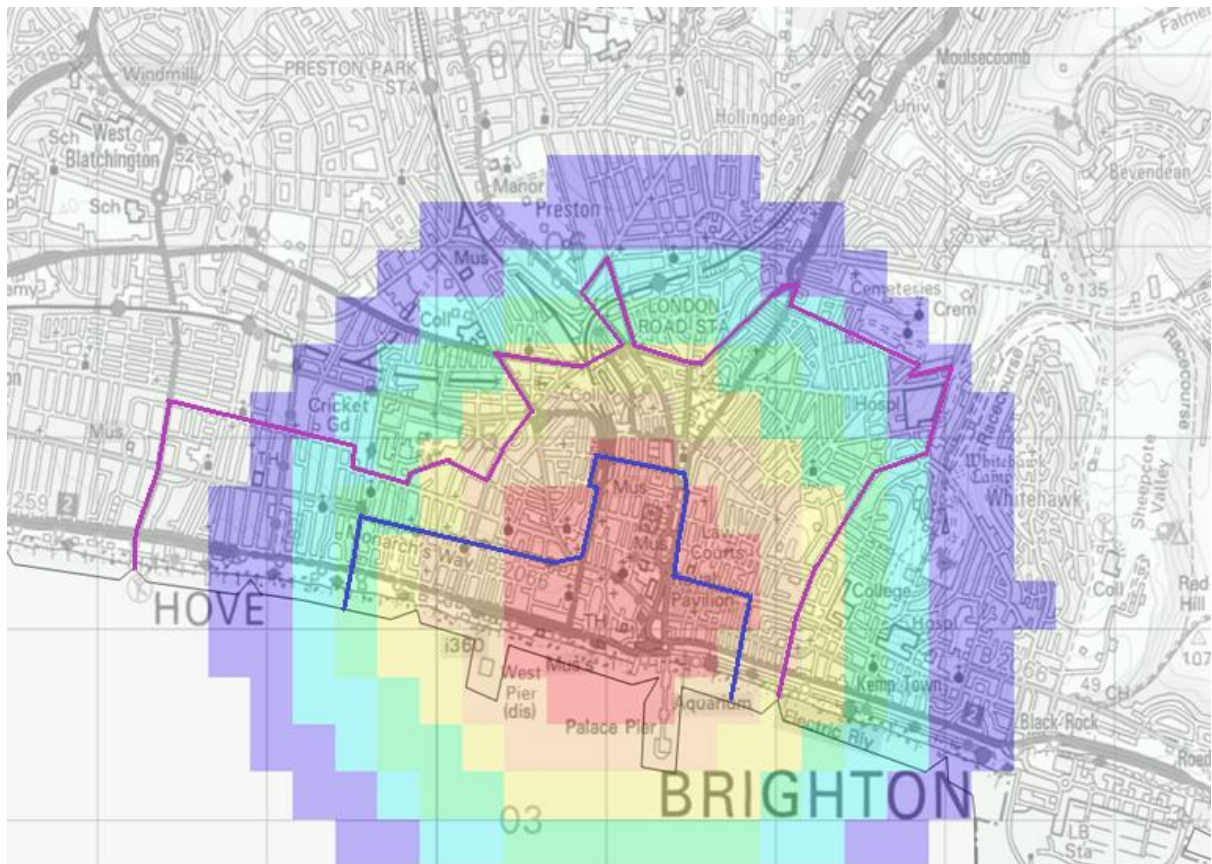


Non-Marble Timings

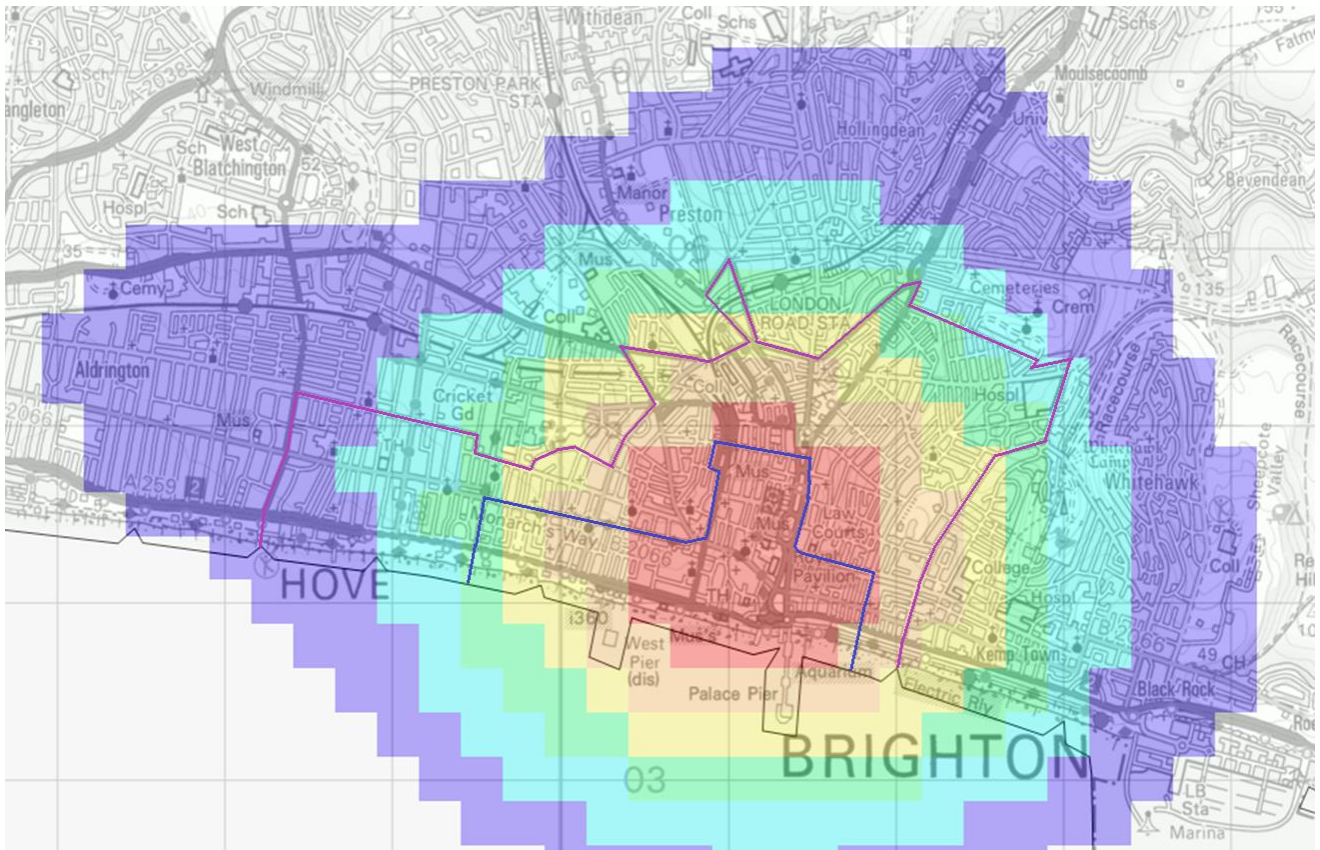


City Centre Crime Hotspot

Op Marble Timings



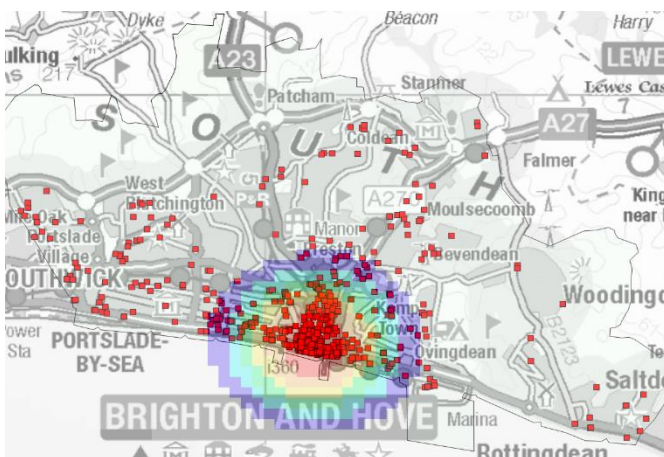
Non-Marble Timings



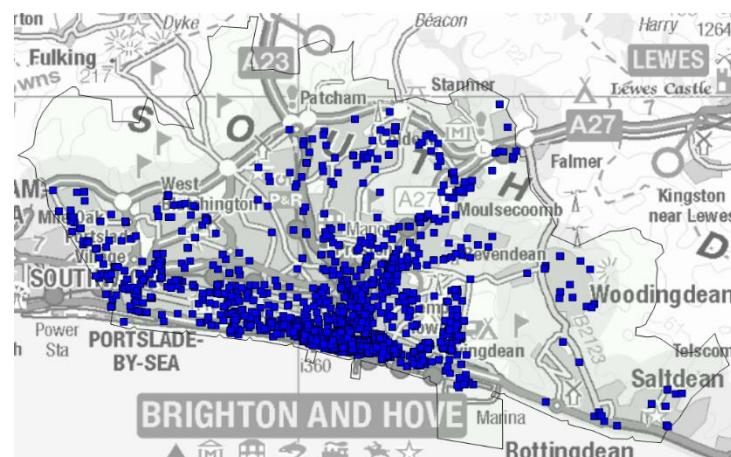
2024

City Wide Crime

Op Marble Timings

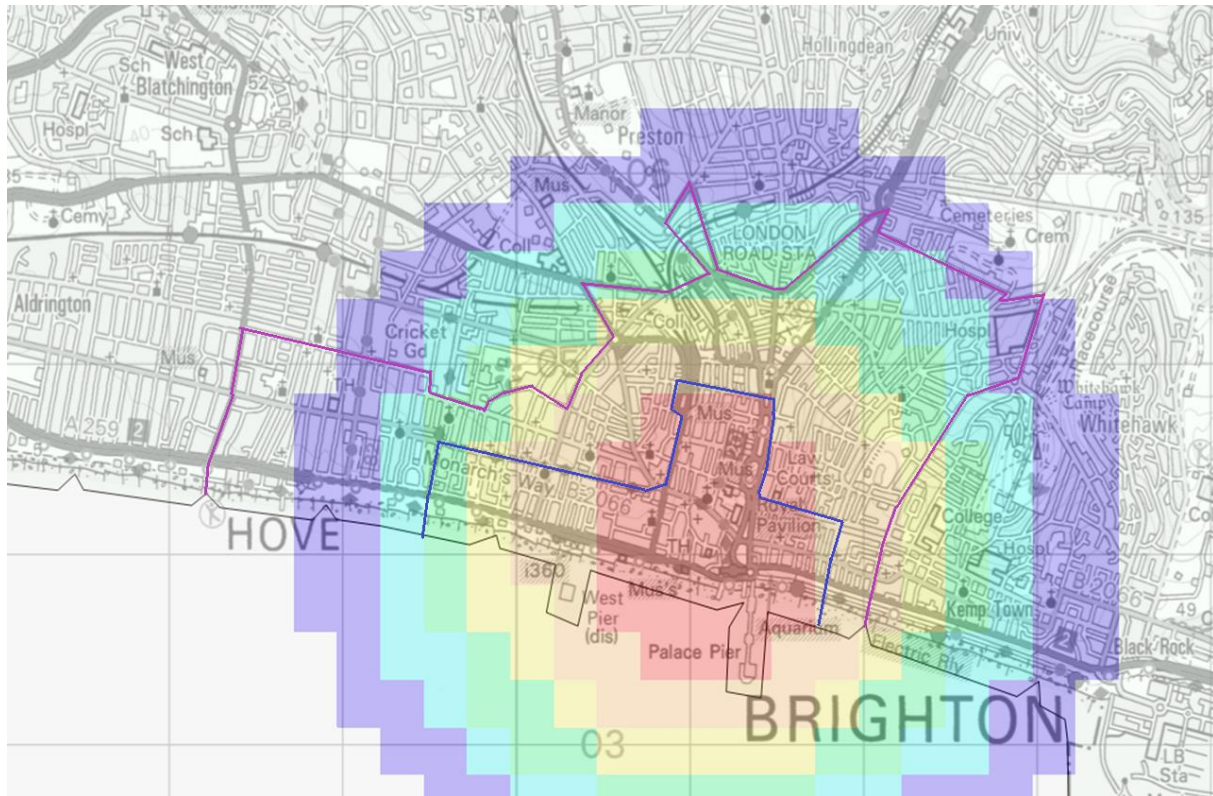


Non-Marble Timings

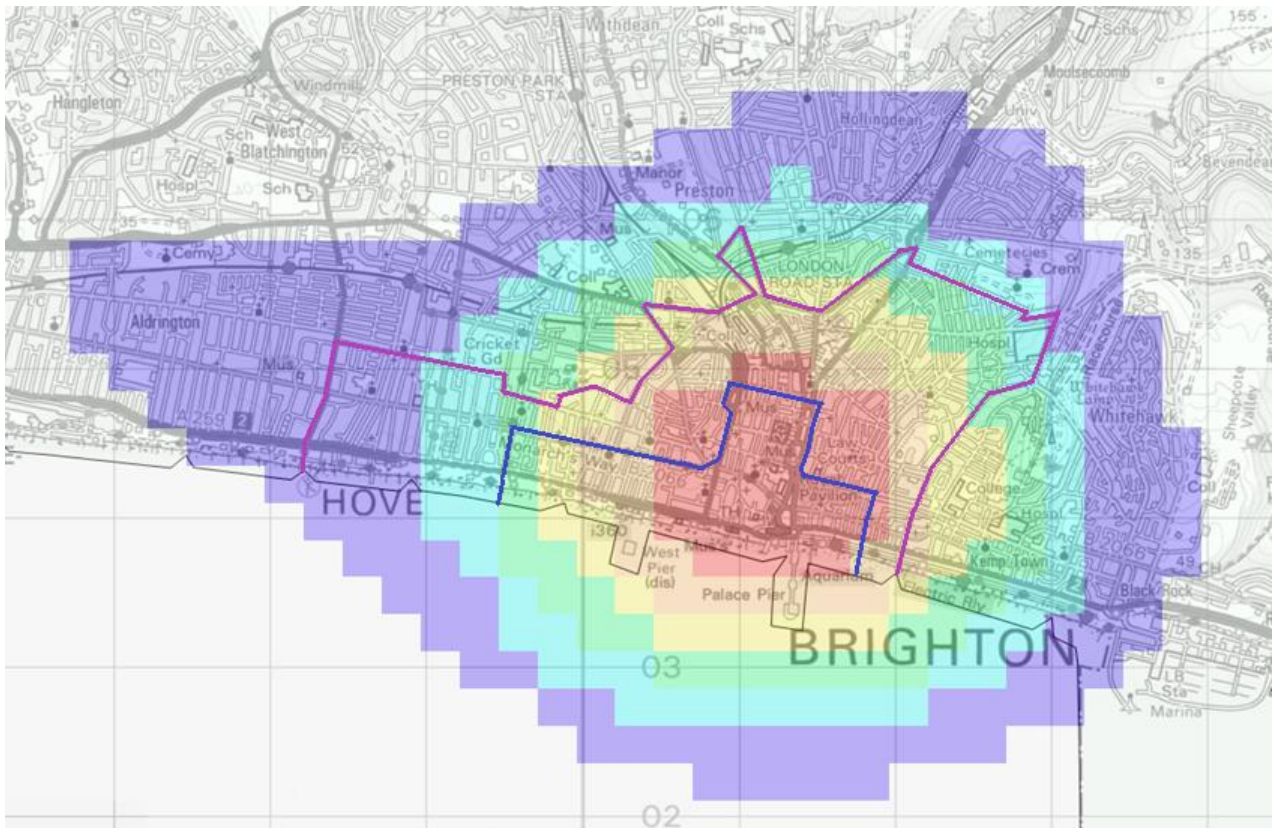


City Centre Crime Hotspot

Op Marble Timings



Non-Marble Timings



Timings and the Matrix Approach

There continues to be an increasing demand for Police resources further into the early hours of the morning at the weekends, with the highest risk remaining consistent year on year. Brighton & Hove is also a university town, and the student population will have an impact on the midweek figures due to student nights and other student focused events.

Summary of Temporal Analysis (Tables shown below)

To note: Temporal analysis is calculated based on probability. Police will not always know an exact time a crime occurred and so when it could have occurred over a few hours the whole-time frame will be used. This results in a decimal result in the data as opposed to a whole number.

The core hours of 22:00 on a Friday until 04:00 on a Saturday and 21:00 on a Saturday until 04:00 on a Sunday show the highest risk (marked red) across all 3 years' worth of data with this extending into moderately high risk (marked orange) until 05:00 both Saturday and Sunday in 2022, 2023 and 2024. This consistent demand to Policing until the early hours across all 3 years of data provides evidence of the risk for violent crime that is affected by intoxication, particularly in the city centre. Any extension to licensable hours or additional licensed premises granted without careful consideration is highly likely to add to the existing issues that the Brighton & Hove already faces.

Key to Tables

Highest risk	
Moderately high risk	
Moderate risk	
Moderately low risk	
Lowest risk	

The numbers in the tables show the total numbers of individual incidents of crime during the stated date period.

Op Marble

Table 1a – Op Marble Timings 2022 (01/01/2022 – 31/12/2022)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	0.00	0.00	0.00	0.00	0.00	55.29	68.09	123.38
0100-0200	0.00	0.00	0.00	0.00	0.00	52.29	70.79	123.08
0200-0300	0.00	0.00	0.00	0.00	0.00	53.96	57.54	111.49
0300-0400	0.00	0.00	0.00	0.00	0.00	50.76	48.73	99.48
0400-0500	0.00	0.00	0.00	0.00	0.00	31.87	24.03	55.89
0500-0600	0.00	0.00	0.00	0.00	0.00	19.20	18.95	38.15
0600-0700	0.00	0.00	0.00	0.00	0.00	6.27	11.25	17.52
0700-0800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0800-0900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0900-1000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1000-1100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1100-1200	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1200-1300	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1300-1400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1400-1500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1500-1600	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1600-1700	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1700-1800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1800-1900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1900-2000	0.00	0.00	0.00	0.00	16.22	26.30	0.00	42.52
2000-2100	0.00	0.00	0.00	0.00	19.57	29.69	0.00	49.27
2100-2200	0.00	0.00	0.00	0.00	33.41	41.69	0.00	75.10
2200-2300	0.00	0.00	0.00	0.00	37.77	44.09	0.00	81.86
2300-0000	0.00	0.00	0.00	0.00	49.40	51.87	0.00	101.27
Total	0.00	0.00	0.00	0.00	156.37	463.27	299.36	919.00

Table 1b – Op Marble Timings 2023 (01/01/2023 – 31/12/2023)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	0.00	0.00	0.00	0.00	0.00	63.64	70.61	134.25
0100-0200	0.00	0.00	0.00	0.00	0.00	59.14	84.44	143.58
0200-0300	0.00	0.00	0.00	0.00	0.00	62.67	67.03	129.70
0300-0400	0.00	0.00	0.00	0.00	0.00	39.17	45.49	84.67
0400-0500	0.00	0.00	0.00	0.00	0.00	26.81	36.48	63.29
0500-0600	0.00	0.00	0.00	0.00	0.00	15.04	15.34	30.38
0600-0700	0.00	0.00	0.00	0.00	0.00	15.54	9.33	24.87
0700-0800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0800-0900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0900-1000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1000-1100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1100-1200	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1200-1300	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1300-1400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1400-1500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1500-1600	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1600-1700	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1700-1800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1800-1900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1900-2000	0.00	0.00	0.00	0.00	33.10	22.09	0.00	55.19
2000-2100	0.00	0.00	0.00	0.00	29.86	26.76	0.00	56.62
2100-2200	0.00	0.00	0.00	0.00	35.02	50.40	0.00	85.42
2200-2300	0.00	0.00	0.00	0.00	42.19	30.91	0.00	73.10
2300-0000	0.00	0.00	0.00	0.00	56.81	69.11	0.00	125.92
Total	0.00	0.00	0.00	0.00	196.98	481.29	328.73	1007.00

Table 1c – Op Marble Timings 2024 (01/01/2024 – 31/12/2024)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	0.00	0.00	0.00	0.00	0.00	50.12	46.04	96.16
0100-0200	0.00	0.00	0.00	0.00	0.00	50.62	66.54	117.16
0200-0300	0.00	0.00	0.00	0.00	0.00	59.70	65.54	125.24
0300-0400	0.00	0.00	0.00	0.00	0.00	47.53	65.63	113.16
0400-0500	0.00	0.00	0.00	0.00	0.00	23.00	30.21	53.21
0500-0600	0.00	0.00	0.00	0.00	0.00	20.00	13.71	33.71
0600-0700	0.00	0.00	0.00	0.00	0.00	10.00	12.38	22.38
0700-0800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0800-0900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
0900-1000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1000-1100	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1100-1200	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1200-1300	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1300-1400	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1400-1500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1500-1600	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1600-1700	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1700-1800	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1800-1900	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
1900-2000	0.00	0.00	0.00	0.00	23.25	37.00	0.00	60.25
2000-2100	0.00	0.00	0.00	0.00	23.42	43.00	0.00	66.42
2100-2200	0.00	0.00	0.00	0.00	27.92	30.33	0.00	58.25
2200-2300	0.00	0.00	0.00	0.00	32.50	56.50	0.00	89.00
2300-0000	0.00	0.00	0.00	0.00	44.95	49.13	0.00	94.08
Total	0.00	0.00	0.00	0.00	152.03	476.93	300.04	929.00

Non-Marble Timings

Table 2a – Non-Marble Timings 2022 (01/01/2022 – 31/12/2022)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	20.02	22.76	18.23	30.79	18.10	0.68	0.73	111.32
0100-0200	20.16	9.95	18.03	13.79	21.77	0.68	0.80	85.18
0200-0300	16.16	17.31	9.02	19.79	26.27	0.68	1.08	90.31
0300-0400	11.83	8.81	9.63	16.21	20.77	0.68	1.08	69.00
0400-0500	0.83	9.06	13.63	7.19	6.78	0.68	1.08	39.25
0500-0600	3.63	5.56	6.55	3.85	3.65	0.68	1.25	25.16
0600-0700	3.63	6.56	0.55	2.85	2.65	1.18	1.25	18.66
0700-0800	2.63	3.56	4.55	3.69	2.65	6.19	8.22	31.49
0800-0900	7.15	7.39	5.55	3.69	8.65	3.57	6.06	42.05
0900-1000	7.11	9.39	10.50	3.69	6.65	11.57	5.29	54.21
1000-1100	5.11	5.39	12.99	3.54	6.55	7.57	4.26	45.41
1100-1200	6.78	5.81	10.74	13.52	7.55	8.48	10.24	63.11
1200-1300	8.94	7.33	9.19	5.52	8.55	9.46	9.12	58.11
1300-1400	3.94	16.83	11.32	9.52	12.44	11.46	6.16	71.67
1400-1500	5.10	8.80	10.32	12.16	13.44	11.96	15.15	76.93
1500-1600	10.07	8.45	11.17	10.80	17.47	13.25	9.80	81.02
1600-1700	11.94	13.95	9.28	10.30	15.95	14.25	14.39	90.05
1700-1800	6.94	17.03	13.74	6.88	21.14	11.75	20.84	98.31
1800-1900	12.77	14.59	15.78	9.87	16.68	27.55	14.70	111.94
1900-2000	25.19	20.95	13.78	31.01	1.68	1.46	19.85	113.93
2000-2100	10.69	15.19	14.03	20.06	1.10	1.00	18.85	80.93
2100-2200	10.09	19.19	17.96	9.06	1.10	0.76	20.81	78.98
2200-2300	23.92	18.02	27.99	22.27	0.85	0.83	27.77	121.65
2300-0000	14.48	31.03	17.67	23.97	0.91	0.70	23.57	112.35
Total	249.11	302.88	292.17	294.04	243.33	147.08	242.38	1771.00

Table 2b – Non-Marble Timings 2023 (01/01/2023 – 31/12/2023)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	34.63	25.78	23.77	19.45	25.55	0.64	1.09	130.91
0100-0200	15.88	16.51	13.60	22.29	26.80	0.64	1.10	96.83
0200-0300	19.46	15.18	10.77	15.62	24.96	0.54	0.98	87.51
0300-0400	20.46	3.85	12.27	20.54	17.38	0.68	0.87	76.04
0400-0500	7.42	9.65	4.90	11.70	19.38	0.67	0.83	54.55
0500-0600	3.67	3.40	4.40	5.17	6.88	0.71	1.16	25.39
0600-0700	10.42	4.40	3.40	3.47	3.55	0.71	1.08	27.02
0700-0800	5.55	3.30	6.57	8.47	9.50	8.75	7.08	49.21
0800-0900	9.55	2.30	12.57	11.39	6.50	7.09	13.70	63.09
0900-1000	7.47	5.30	16.83	3.43	5.50	9.95	17.20	65.69
1000-1100	7.47	10.21	10.78	5.94	4.51	12.89	9.13	60.93
1100-1200	10.46	10.21	17.41	12.95	6.85	13.50	4.63	75.99
1200-1300	11.40	8.32	8.55	7.36	19.85	13.29	9.13	77.90
1300-1400	9.40	10.32	5.63	13.28	13.35	15.79	18.63	86.40
1400-1500	13.90	6.25	18.63	9.42	13.88	12.24	8.63	82.97
1500-1600	11.78	9.81	16.63	17.03	15.38	18.62	21.26	110.52
1600-1700	18.72	20.31	19.13	16.66	15.88	19.16	16.76	126.62
1700-1800	18.47	21.79	23.13	13.66	26.71	22.65	18.81	145.23
1800-1900	12.97	10.29	18.52	17.49	18.14	25.97	17.43	120.81
1900-2000	16.72	17.79	23.76	19.66	1.14	0.97	31.39	111.43
2000-2100	16.72	23.83	24.04	23.20	1.15	1.01	24.17	114.12
2100-2200	23.57	23.71	28.67	29.05	0.82	1.17	31.17	138.15
2200-2300	23.71	36.21	28.67	28.22	0.76	1.17	30.59	149.33
2300-0000	19.53	28.57	24.84	13.66	0.76	1.00	28.00	116.35
Total	349.32	327.26	377.48	349.12	285.18	189.82	314.81	2193.00

Table 2c – Non-Marble Timings 2024 (01/01/2024 – 31/12/2024)

	MON	TUE	WED	THU	FRI	SAT	SUN	Total
0000-0100	27.60	35.83	20.10	20.74	29.13	0.64	0.57	134.62
0100-0200	20.10	11.67	24.46	23.24	27.68	0.57	0.57	108.29
0200-0300	18.23	16.67	13.46	29.59	11.22	0.57	0.58	90.31
0300-0400	12.73	17.01	15.96	12.96	22.72	0.57	0.58	82.53
0400-0500	12.48	8.51	7.76	14.96	14.22	0.48	0.54	58.97
0500-0600	7.38	9.51	5.76	8.83	5.47	0.78	0.54	38.28
0600-0700	14.80	3.68	12.26	10.70	5.47	0.78	0.54	48.24
0700-0800	9.80	5.68	6.20	4.70	2.97	11.78	11.91	53.05
0800-0900	2.69	10.72	8.21	15.62	2.97	8.45	6.91	55.57
0900-1000	8.71	3.81	11.51	7.62	11.45	4.62	13.91	61.63
1000-1100	4.71	10.81	12.98	13.92	14.45	6.23	11.58	74.68
1100-1200	8.32	9.15	5.77	13.42	11.52	15.23	9.58	72.98
1200-1300	15.34	16.43	16.35	14.42	17.46	16.73	7.53	104.25
1300-1400	8.38	10.84	13.84	7.92	8.47	13.73	5.94	69.11
1400-1500	11.37	21.51	9.34	16.42	23.41	18.81	15.94	116.79
1500-1600	24.24	20.17	8.34	24.42	17.40	19.64	13.94	128.14
1600-1700	17.37	15.46	10.30	17.75	30.48	18.60	20.94	130.89
1700-1800	13.88	15.46	10.30	12.75	10.81	21.32	24.88	109.40
1800-1900	20.88	30.40	17.30	17.42	21.60	30.32	21.46	159.38
1900-2000	17.13	27.09	26.62	21.09	1.59	1.17	24.06	118.75
2000-2100	24.83	19.84	20.73	19.89	1.11	0.50	23.30	110.19
2100-2200	22.24	26.76	24.56	33.89	1.11	0.54	27.75	136.85
2200-2300	19.91	29.80	16.19	32.89	0.62	0.54	42.79	142.74
2300-0000	19.70	23.83	41.65	24.32	0.62	0.59	28.63	139.34
Total	362.82	400.65	359.92	419.49	293.96	193.18	314.99	2345.00

Appendix A – Caveats and Explanations on the Data provided and used

An i-base search of Niche (Police Recording System) Crime Data was completed searching the date actual from '01/01/2022 – 31/12/2024', the area division 'Brighton and Hove', the HO Crime Group 'Violent Crime', the Class NICL 'ALC' or 'DRG', or the Substance Use field equal to 'affected by alcohol', or 'affected by drink and drugs', or 'affected by drink or drugs', or 'affected by drugs'.

Domestic abuse occurrences were included in both Op Marble and Non- Marble data sets. Reference made to domestic abuse occurrences is based on the completion of the 'Hate Crime' field which contain 'DOM', however, is reliant on the completion of this field. Based on the 'Stats Status Type' field, any 'not grouped' or 'no crimes' were removed from the data. It was requested that the data was inclusive of occurrences with the stats status type as 'crime' or 'non-crime incident', as whilst crimes are the main focus of the report, non-crime incidents also capture incidents that police have attended or spent time dealing with. This therefore shows the demand during Op Marble and Non-Marble times. There are some occurrences within the overall data set which have a 'date actual from' in either 2022, 2023, or 2024, but the date actual to may end the following year. These incidents have been kept in the data to reflect the search criteria of date actual from.

A caveat to be mentioned – the Class NICL and Substance Use field are reliant on the accuracy of this information being recorded accurately, if at all. Where this field is incomplete then the occurrence would not feature within the data set. Therefore, it is almost certain that there will be a large number of occurrences that will not be included within the data set based on the reliance on the Class NICL and Substance Use field, but those involved were intoxicated.

Numerical data sitting behind Graph 1.

	2022	2023	2024
Crime	2229	3107	3360
Non-Crime Incident	547	182	0
TOTAL	2776	3289	3360

The data shows that the overall number of occurrences of violence and intoxication increased year on year. Whilst the number of non-crime incidents have decreased from 2022 – 2024, the number of crimes increased. To note, there were a high proportion of non-crime incidents with the HO Return Code Description 'assault with injury' in 2022, however, this decreased in 2023 and there were none in 2024. If the approach to such occurrences have changed, viewing these occurrences as crimes not non-crime incidents, where there were fewer occurrences in 2023 and none 2024, then this is likely to have impacted the overall increase in crime data.

The chart shows that over the last 3 years, there were less than a quarter of occurrences during the Op Marble DPA which were domestic related. The year with the highest number of domestic occurrences was 2023 which accounted for 23.5% of all occurrences during the DPA (240 actual).

Domestic Abuse occurrences were any occurrences which contained 'DOM' in the Hate Crime field. Also, all occurrences have either 'ALC' or 'DRG' Class NICL or the Substance Use field contains: 'affected by alcohol', or 'affected by drink and drugs', or 'affected by drink or drugs', or 'affected by drugs'.

Review of the draft Statement of Licensing Policy for 2026 to 2031 - Review of Statement of Licensing Policy 2026

Instructions

- Write as **clearly** as you can— these forms might be scanned
- Write your answers in the same language as this form

About you

1. How are you responding to this survey? (optional)

**Only choose one option.*

- | | |
|---|--|
| <input type="radio"/> Local resident | <input type="radio"/> Community group representative |
| <input type="radio"/> Student | <input type="radio"/> Regular visitor to Brighton & Hove |
| <input type="radio"/> Licensed premises employee | <input type="radio"/> Licensed premises operator |
| <input type="radio"/> Local business owner (non licensed) | <input type="radio"/> Other |

If 'Other', please specify

About you

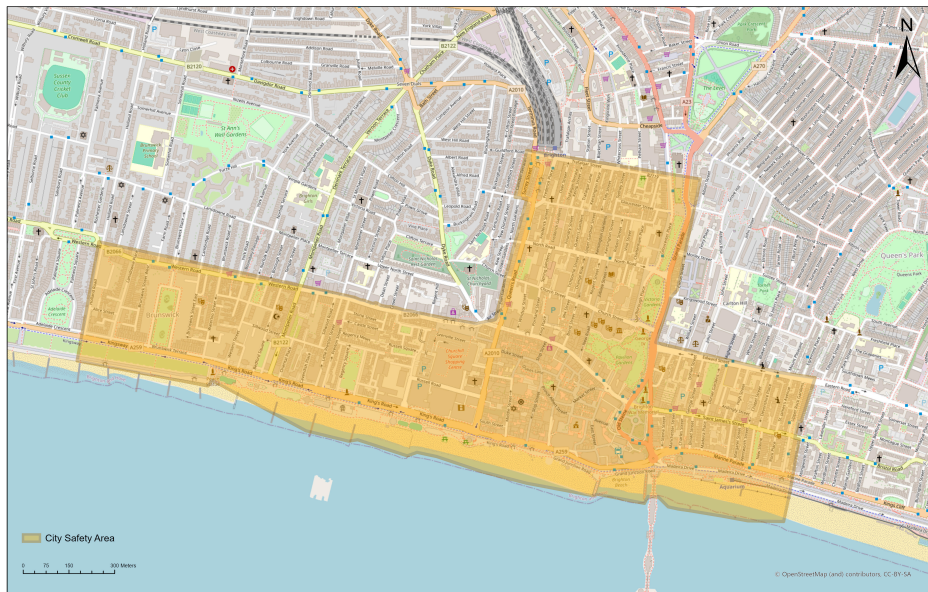
2. What is your postcode? (optional)

About you

3. What is the name of the organisation or business you are representing? (optional)

New City Safety Area (CSA)

City Safety Area, July 2025



The City Safety Area

(CSA) is a proposed replacement for the current Cumulative Impact Zone (CIZ).

It covers a central part of the city where there are high levels of crime, anti-social behaviour and alcohol-related harm, especially at night. It includes West Street, parts of the seafront and the surrounding streets.

Even though the area covered stays the same, the CSA changes the approach. It now focuses more on keeping people safe instead of automatically saying no to new licence applications.

This includes encouraging responsible venue management and implementing safety measures like ID scanners, vulnerability training and anti-spiking prevention policies.

4. How much do you support or oppose the proposal to replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA)? (optional)

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

5. Do you have any other comments about replacing the CIZ with a CSA?

Matrix approach changes

The matrix is a guide used by the council to decide what types of licensed venues are suitable in different areas and at what times they can operate.

The revised matrix introduces new venue categories like grassroots music venues, performance venues and shared workspaces.

It also adjusts permitted hours to better reflect community needs and safety priorities.

6. How much do you support or oppose replacing the 'restaurant' category with 'food and dining'? (optional)

We're proposing to replace the 'restaurant' category with 'food and dining' and allowing these venues to stay open until 1am.

This change follows today's dining habits but still keeps the focus on places that serve food, not bars or nightclubs.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

7. How much do you support or oppose replacing the 'late night takeaway' category with 'fast food premises'? (optional)

We're proposing to replace the 'late night takeaway' category with a new category called 'fast food premises'.

These are venues that serve hot food for immediate consumption, often in disposable packaging, either on-site or for takeaway.

The closing time for these venues will remain the same, but there are some changes in the Special Stress Area (SSA) and other parts of the city:

- In the SSA, fast food premises will be allowed to open until midnight, with deliveries allowed until 2am.
- In the City Safety Area (CSA), fast food premises are not permitted under the Matrix Approach.

The SSA is a part of the city centre where there are higher levels of crime, anti-social behaviour and public nuisance linked to alcohol use. It borders the CSA and includes places like central Hove, Preston Road and Beaconsfield Road.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

8. How much do you support or oppose introducing a 'grassroots music venue' category? (optional)

We're proposing to introduce a new 'grassroots music venue' category with a closing time of midnight in the CSA and 1am in the SSA.

Grassroots music venues are small, typically local venues that provide a platform for emerging and independent musicians to perform.

They're often pubs, clubs or other small spaces where artists can hone their craft, gain experience and connect with a local audience.

These venues play a crucial role in nurturing talent and supporting the development of the music scene.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

9. How much do you support or oppose introducing a 'shared workspaces' category?
(optional)

We're proposing to introduce a new 'shared workspaces' category with a closing time of midnight. This includes co-working spaces.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

10. Do have any additional comments about the proposed changes to the matrix categories and hours?

Good operator policy

We know that well-run licensed premises play an important role in keeping Brighton & Hove safe, vibrant and welcoming. To support this, we're introducing a new approach called the good operator policy.

This policy aims to reward responsible businesses. If a venue has a strong track record of good management and hasn't had any formal issues with the authorities in the past 3 to 5 years, they may be given more flexibility when applying to change their licence – including extending their opening hours beyond what is normally allowed.

To qualify, the applicant must already hold the licence for the premises and meet all the criteria set out in the policy.

11. Do you support or oppose the introduction of a good operator policy? (optional)

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

12. Do you have any comments about the proposed good operator policy?

Introducing enhanced safety measures

As part of the City Safety Area (CSA), venues applying for licences will be expected to include extra safety measures in their operating schedules.

These include:

- staff training
- policies to prevent drink spiking and unwanted sexual behaviour
- support for vulnerable people
- use of CCTV and ID scanners
- steps to reduce noise and nuisance

Venues will also be encouraged to join local safety schemes and promote equality and inclusion.

13. Do you support or oppose licensed venues having clear, fair policies that promote inclusion and prevent discrimination? (optional)

We're proposing that licensed venues adopt clear and fair policies that promote inclusion and prevent discrimination.

This means having a comprehensive, documented equalities and inclusion policy framework that shows commitment to creating and maintaining a fair, diverse and inclusive environment.

This framework should encompass clear policies, procedures, and measurable objectives that actively support equal opportunities, prevent discrimination and harassment, and help create an inclusive culture where everyone feel safe and included.

**Only choose one option.*

- ☐ Yes
- ☐ No
- ☐ Not sure

14. Do you support or oppose licensed venues having enhanced anti-spiking policies and training for staff? (optional)

Stronger anti-spiking policies mean venues must have clear steps in place to prevent and respond to drink spiking.

Staff should be trained to spot signs of spiking and vulnerability, know how to act quickly and appropriately, and offer proper support. That includes caring for the person affected, preserving evidence and reporting the incident.

Venues are also encouraged to offer drink covers, display awareness materials, and follow a safety-first door policy, making sure vulnerable people aren't removed without support.

These measures are backed by Sussex Police, the Business Crime Reduction Partnership, and national campaigns like Ask for Angela and the Home Office's Spiking Awareness programme.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

15. How much do you support or oppose licensed premises having safety-first door policies? (optional)

We're proposing that licensed premises must have a safety-first door policy that puts care and responsibility at the heart of how venues treat vulnerable individuals.

No one, especially lone adults, should be removed without support. Whether someone is intoxicated, separated from their group, or simply in need of help, venues must act with duty and compassion to ensure their safety.

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

16. How much do you support or oppose licensed premises having ID scanners? (optional)

ID scanners will:

- prevent underage entry: scanners help verify age and detect fake or borrowed IDs, reducing the risk of underage drinking
- deter crime and disorder: knowing that ID is being scanned can discourage individuals with a history of violence or anti-social behaviour from entering
- support police investigations: if an incident occurs, scanned data can assist police in identifying individuals involved, improving response and accountability
- protect vulnerable people: scanners can help identify repeat victims or individuals at risk, allowing staff to intervene early and offer support

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

17. Are there any other safety measures you think should be required?

LGBTQ+ and TNBI inclusion standards

The revised policy introduces new standards to ensure licensed venues are inclusive and welcoming to LGBTQ+ and TNBI communities.

This includes staff training, inclusive signage and policies that promote respect and safety for everyone.

18. How important is it to you that licensed venues in Brighton & Hove actively promote equality, diversity, and inclusion? (optional)

**Only choose one option.*

- | | |
|--|--|
| <input type="radio"/> Very important | <input type="radio"/> Somewhat important |
| <input type="radio"/> Not very important | <input type="radio"/> Not important at all |
| <input type="radio"/> Not sure | |

19. How important is it to you that venue staff receive training about LGBTQ+ and TNBI communities? (optional)

**Only choose one option.*

- | | |
|--|--|
| <input type="radio"/> Very important | <input type="radio"/> Somewhat important |
| <input type="radio"/> Not very important | <input type="radio"/> Not important at all |
| <input type="radio"/> Not sure | |

20. Do you think venues should offer a way to report discrimination or harassment? (optional)

**Only choose one option.*

- ☐ Yes
- ☐ No
- ☐ Not sure

21. Are there any other steps you think venues should take to make LGBTQ+ and TNBI communities feel safe and welcome?

Violence against women and girls (VAWG)

Our draft policy puts stronger focus on stopping violence against women and girls. It's about making sure venues take real steps to prevent harm and create safer spaces for everyone.

22. How much do you support or oppose high risk venues having clear procedures in place to prevent and respond to drink spiking, including staff training, incident reporting and victim support? (optional)

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

23. Do you support or oppose the enhanced focus on stopping violence against women and girls?

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

Alcohol delivery services

24. Do you support or oppose the inclusion of enhanced scrutiny and conditions for alcohol delivery services? (optional)

These include:

- deliveries only to verifiable residential or business addresses
- face-to-face ID verification at the point of delivery
- no deliveries to parks or open spaces
- comprehensive driver training on age verification and safeguarding
- detailed delivery records available for inspection

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> Strongly support | <input type="radio"/> Support |
| <input type="radio"/> Neither support or oppose | <input type="radio"/> Oppose |
| <input type="radio"/> Strongly oppose | <input type="radio"/> Don't know |

25. Do you have any further comments about alcohol delivery services?

Overall assessment

The key proposed changes in our licensing policy are:

- replacing the Cumulative Impact Zone (CIZ) with a City Safety Area (City Safety Area)
- focusing on safety as the central priority
- updated Matrix approach including new venue categories
- introduction of a 'good operator policy'
- enhanced LGBTQ+ and inclusion standards
- enhanced focus on safeguarding, including violence against women and girls (VAWG)
- new vulnerability training requirements covering drink spiking, Ask for Angela and safety-first door policies
- new partner initiatives like Nightlife Safety Advocates, Back Off Back Up (BOBU) and Night Safety Marshalls

26. Overall, do you think the proposed changes will: (optional)

**Only choose one option.*

- | | |
|--|--|
| <input type="radio"/> Significantly improve safety and licensing | <input type="radio"/> Somewhat improve the situation |
| <input type="radio"/> Make little difference | <input type="radio"/> Somewhat worsen the situation |
| <input type="radio"/> Significantly worsen the situation | <input type="radio"/> Don't know |

27. Do you have any concerns about the proposed changes? (optional)

28. What do you think is the most positive aspect of the proposed changes? (optional)

29. Are there any important issues that have not been adequately addressed?

How did you hear about this consultation?

30. How did you hear about this consultation? (optional)

**Choose as many as you like*

- | | |
|--|---|
| <input type="checkbox"/> Council website | <input type="checkbox"/> Social media |
| <input type="checkbox"/> I attended the Licensing Summit | <input type="checkbox"/> Word of mouth |
| <input type="checkbox"/> Email notification | <input type="checkbox"/> Trade association or professional body |
| <input type="checkbox"/> Other | |

If 'Other', please specify

Equalities monitoring

The council also has a legal duty to make sure that we provide our services in a fair way to all members of the community.

You do not have to answer these questions. Please tick the 'prefer not to say' option if this is the case.

31. Do you want to answer the following equalities monitoring questions? (optional)

**Only choose one option.*

- ☐ Yes
- ☐ No

What best describes your sex and gender?

32. What best describes your sex and gender? (optional)

**Only choose one option.*

- | | |
|---|--|
| <input type="radio"/> Female | <input type="radio"/> Male |
| <input type="radio"/> Non-binary | <input type="radio"/> intersex |
| <input type="radio"/> Prefer not to say | <input type="radio"/> Other, please describe |

Is the gender you identify with the same as your sex registered at birth?

33. Is the gender you identify with the same as your sex registered at birth? (optional)

**Only choose one option.*

- ☐ Yes
- ☐ No
- ☐ Prefer not to say
- ☐ No answer

How would you describe your ethnic origin?

34. How would you describe your ethnic origin? (optional)

**Only choose one option.*

- | | |
|---|---|
| <input type="radio"/> White: English, Welsh, Scottish, Northern Irish, British | <input type="radio"/> White: Other |
| <input type="radio"/> Mixed: Asian and White | <input type="radio"/> Other Ethnic Group: Arab |
| <input type="radio"/> White: Irish | <input type="radio"/> Mixed: Black Caribbean and White |
| <input type="radio"/> Black / Black British: Other (Please share details below) | <input type="radio"/> Black / Black British: Caribbean |
| <input type="radio"/> Asian / Asian British: Other (please share details below) | <input type="radio"/> Asian / Asian British: Indian |
| <input type="radio"/> Mixed: Black African and White | <input type="radio"/> Black / Black British: African |
| <input type="radio"/> White: Gypsy or Irish Traveller | <input type="radio"/> Asian / Asian British: Pakistani |
| <input type="radio"/> Asian / Asian British: Chinese | <input type="radio"/> Other ethnic group, please describe |
| <input type="radio"/> Asian / Asian British: Bangladeshi | <input type="radio"/> Prefer not to say |

Which of the following best describes your sexual orientation?

35. Which of the following best describes your sexual orientation? (optional)

**Only choose one option.*

- | | |
|---|---|
| <input type="radio"/> Heterosexual / Straight | <input type="radio"/> No answer |
| <input type="radio"/> Gay Man | <input type="radio"/> Prefer not to say |
| <input type="radio"/> Bisexual / Bi | <input type="radio"/> Lesbian / Gay woman |
| <input type="radio"/> Other, please describe | <input type="radio"/> Queer |
| <input type="radio"/> Asexual | |

What is your religion or belief?

36. What is your religion or belief? (optional)

**Only choose one option.*

- | | |
|---|---|
| <input type="radio"/> I have no particular religion or belief | <input type="radio"/> No answer |
| <input type="radio"/> Christian | <input type="radio"/> Atheist |
| <input type="radio"/> Prefer not to say | <input type="radio"/> Buddhist |
| <input type="radio"/> Hindu | <input type="radio"/> Jewish |
| <input type="radio"/> Muslim | <input type="radio"/> Agnostic |
| <input type="radio"/> Other philosophical belief | <input type="radio"/> Other religion or belief, please describe |
| <input type="radio"/> Jain | <input type="radio"/> Pagan |
| <input type="radio"/> Sikh | |

Do any of your conditions or illnesses reduce your ability to carry out day to day activities?

37. Do any of your conditions or illnesses reduce your ability to carry out day to day activities? (optional)

**Only choose one option.*

- | | |
|--|---|
| <input type="radio"/> No answer | <input type="radio"/> Physical Impairment |
| <input type="radio"/> Long-standing Illness | <input type="radio"/> Mental Health Condition |
| <input type="radio"/> Learning Disability / Difficulty | <input type="radio"/> Prefer not to say |
| <input type="radio"/> Autistic Spectrum | <input type="radio"/> Sensory Impairment |
| <input type="radio"/> Other | <input type="radio"/> Developmental Condition |

What is your legal marital or registered civil partnership status?

38. What is your legal marital or registered civil partnership status? (optional)

**Only choose one option.*

- | | |
|--|---|
| <input type="radio"/> No answer | <input type="radio"/> Never married and never registered in a civilpartnership |
| <input type="radio"/> Married | <input type="radio"/> In a registered civil partnership |
| <input type="radio"/> Divorced | <input type="radio"/> Separated but still legally married |
| <input type="radio"/> Formerly in a civil partnership which is now legally dissolved | <input type="radio"/> Widowed |
| <input type="radio"/> Separated but still legally in a civil partnership | <input type="radio"/> A surviving member of a legally registered civilpartnership |

What is your age?

39. What is your age? (optional)

**Only choose one option.*

- | | |
|---------------------------------|-------------------------------|
| <input type="radio"/> No answer | <input type="radio"/> 0 - 15 |
| <input type="radio"/> 16 - 24 | <input type="radio"/> 25 - 34 |
| <input type="radio"/> 35 - 44 | <input type="radio"/> 45 - 54 |
| <input type="radio"/> 55 - 64 | <input type="radio"/> 65 - 74 |
| <input type="radio"/> 75 - 84 | <input type="radio"/> 85 + |

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

40. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months? (optional)

**Only choose one option.*

- | | |
|---|----------------------------------|
| <input type="radio"/> No | <input type="radio"/> No answer |
| <input type="radio"/> Yes, a little | <input type="radio"/> Yes, a lot |
| <input type="radio"/> Prefer not to say | |

Statement of Licensing Policy 2026–2031 Consultation Report

Introduction

Brighton & Hove City Council conducted a public consultation on the draft Statement of Licensing Policy for 2026–2031. The consultation aimed to gather views from residents, businesses, and stakeholders on proposed changes to the city’s licensing policy. This report summarises the findings of the consultation, including headline results, methodology, detailed results, themed comments, and demographic insights.

Headline Results

Total responses received: 70

Support for replacing the Cumulative Impact Zone with a City Safety Area:

- Support: 22 responses (31.4%)
- Strongly support: 16 responses (22.9%)
Support total (54.3%)
- Neither support nor oppose: 12 responses (17.1%)
- Strongly oppose: 9 responses (12.9%)
- Oppose: 7 responses (10.0%)
Opposed total (22.9%)

Support for introducing a Good Operator Policy

- Support: 16 responses (22.9%)
- Strongly support: 28 responses (40%)
Support total (62.9%)
- Neither support nor oppose: 6 responses (8.6%)
- No answer 2 responses (2.9%)
- Strongly oppose: 14 responses (20%)
- Oppose: 4 responses (5.7%)
Opposed total (25.7%)

Safety First door policies

- Support: 13 responses (18.6%)
- Strongly support: 44 responses (62.9%)
Support total (81.5%)
- Neither support nor oppose. No answer, Don't Know 12 responses (17.2%)
- Oppose: 1 response (1.4%)
Opposed total (1.4 %)

How much do you support or oppose the Late-Night takeaway category

- Support: 17 responses (24.3.%)
- Strongly support: 12 responses (17.1%)
Support total (41.4%)
- Neither support nor oppose. No answer, Don't Know, 16 responses (22.9%)
- Oppose: 7 response (10 %)
- Strongly opposed; 18 responses (25.7)
- Opposed total (35.7 %)**

How important is it to you that licensed venues in Brighton & Hove actively promote equality, diversity, and inclusion?

- Very Important: 37 responses (52.9%)
- Somewhat Important: 15 responses (21.4%)
Support total (74.3%)
- Neither support nor oppose: 12 responses (17.1%)
- No Answer: 5 responses (7.1%)
- Not sure: 3 responses (4.3%)
- Not Important at all: 6 responses (8.6%)
- Not very important: 4 responses (5.7%)
Opposed total (14.1%)

Do you support or oppose the enhanced focus on stopping violence against women and girls?

- Strongly Support: 58 responses (82.9%)
- Support: 9 responses (12.9%)
Support total (95.8%)
- Neither support nor opposed: 1 responses (1.4 %)
- Don't Known: 2 responses (2.9%)

Methodology

The consultation was conducted online via the council's consultation platform. Participants were invited through various channels including the council website, social media, direct emails, and community outreach. The consultation was open from 4 August to 1 November 2025. Responses were collected anonymously and included both quantitative and qualitative feedback.

Statement of Licensing Policy Consultation Results

How are you responding to this survey?

Response	Number	%
Local resident	47	67.1
Licensed premises operator	7	10.0
Other	6	8.6
Community group representative	4	5.7
Local business owner (non licensed)	2	2.9
Licensed premises employee	2	2.9
Student	1	1.4
No answer	1	1.4
Total	70	100.0

Stakeholder

Response	Number	%
No answer	64	91.4

Councillor / resident	1	1.4
local resident	1	1.4
Brighton & Hove Police Licensing	1	1.4
National charity representing grassroots music venues	1	1.4
Agent on behalf of landowner	1	1.4
Local Councillor	1	1.4
Total	70	100.0

How much do you support or oppose the proposal to replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA)?

Response	Number	%
Support	22	31.4
Strongly support	16	22.9
Neither support or oppose	12	17.1
Strongly oppose	9	12.9
Oppose	7	10.0
No answer	4	5.7
Total	70	100.0

Do you have any other comments about replacing the CIZ with a CSA?

Response	Number	%
No	20	29 %
Music Venue Trust (MVT) supports this safety-based approach where there will no longer be a blanket presumption of refusal but working towards scrutiny of the merits of the application and the framework of the Matrix. It is an approach which recognises that the consumption of alcohol is not the primary activity bringing footfall to grassroots music venues, but access to culture.	1	1.4
More responsible licensees and premises should spread out the load and reduce harm. Smaller venues should be encouraged.	1	1.4
It is not a change of name	1	1.4

that is of concern, it is the proposal to increase licencing hours in an already saturated area where alcohol related anti-social behaviour and crime are the norm. "Encouraging responsible venue management" may be the plan but when you have hundreds of inebriated customers spilling out onto the streets of the Old Town, even later than currently, there will only be more disturbance further into the early hours for the residents who live centrally.		
No it seems a better idea	1	1.4
<p>Cumulative Impact remains an issue within the city centre due to the large number of licensed premises in a small geographical area. This attracts a large amount of persons to a single area and the likelihood of crime and disorder increases. Sussex Police have produced crime statistics to inform this Statement of Licensing Policy which show that high levels of violent crime remain in the city centre into the early hours of the morning.</p> <p>Without the presumption of refusal of a cumulative impact area, Sussex Police do have some concerns around new applications in the central area. While we welcome and acknowledge the positives of a safety zone with a diversity of premises, we are acutely aware that operators will</p>	1	1.4

make applications and assurances just to enable their premises licence application to be granted. Once granted it is very difficult under the current Licensing Act 2003 to revoke / remove a premises licence and there have been several recent examples where premises like this have gone on to be the cause or involved with incidents of crime & disorder. This requires intense Police and other agency input and is a real risk to the public.		
Replacing with CSA is a more measured and realistic way to help local hospitality and music venues thrive	1	1.4
It is a step in the right direction but I worry the police will not buy the new concept.	1	1.4
No increase in opening times, food or not.	1	1.4
CSA makes much more sense as safe venues and late night spaces will make the City a better place to be late.	1	1.4
This is extremely important to support existing businesses with excellent track records in increasing revenue and securing their futures and staff jobs.	1	1.4
I fear that granting new licenses will stretch an already weak night time economy to the point of collapse. There simply is not enough people/customers	1	1.4

<p>in town to support the venues that already exist. More venues/licenses could likely cause existing safe & compliant venues to close. In addition, if licenses are granted to, for example pubs & bars, the first things to go will be the night clubs. However shortly after that you will start to see grass roots live music venues disappear as well. This is because small grass roots live music venues cannot operate on live music alone in this current economic climate. It requires the night club element as well to simply pay the rents. If the night clubs close, & the pubs & bars get busier - I believe you would also see more vulnerability on the streets. Not less. As responsible club operators have learned over the years how to keep customers safe. Pubs & bars are simply not as well equipped to handle certain incidents.</p> <p>In summary, I believe the city would become more dangerous & would cause catastrophic impact to the live music scene.</p>		
Even the language "safety" implies the licensing extension will affect the safety of residents, who are already under immense strain from late night ASB	1	1.4
Fully support	1	1.4
I believe the changes are fantastic	1	1.4
No case made anywhere for the introduction of a CSA and particularly for a	1	1.4

presumption in favour of additional licensed premises or extended hours.		
Oppose the presumption to grant additional licenses in the city centre rather than the previous presumption to refuse, which required democratic intervention. Oppose extension of takeaway hours.	1	1.4
Resources are too limited to ensure safety	1	1.4
This looks more like a rebranding exercise than any meaningful change. It certainly does not encourage or support existing licensed venues or potential new applicants	1	1.4
While the intention to prioritise safety is welcome, I am deeply concerned that moving away from automatic refusals could open the door to more late-night venues in an area already under immense pressure from crime, anti-social behaviour and alcohol-related harm. These problems are not hypothetical they are felt daily by the community. Relying on voluntary safety measures without strong, consistent enforcement risks making the situation worse, not better. Protecting residents, workers and vulnerable people must be the absolute priority, and any change that weakens existing safeguards would be a serious mistake.	1	1.4
The granting of new licence should be on a one	1	1.4

in one out basis. Essentially penalising those that break the rules		
Safety issues are important. Licencing changes (focusing on more leniency and extentions) are not necessary and of major concern for all residents of the central old town area who are already suffering from an overload of licenced premises and the anti-social behaviour of inebriated customers from those restaurants, pubs and clubs into the early hours.	1	1.4
It isn't clear what a City Safety area will actually mean especially as we don't have enough police to actually ensure the safety of everyone if there are more late night venues operating. We are too dependent ont he voluntary sector to help enusre safety int he night-time economy.	1	1.4
The overall intent of increasing a safety-focused approach is very good. The encouragement of more mixed use and fewer night clubs etc is good. I very strongly object to the extension of licensing hours for any venues. The impact in ant-social behaviour, noise and disruption is unacceptable to the many people who live in the town centre.	1	1.4
This city is already drowning in licensed premises and now you propose to add more into this area. The problem is that judging by the amount of crime and anti-social behaviour in this city - I	1	1.4

don't have any confidence that you will be able "to keep people" as you describe it. Where are the police in all this? Way over-stretched I would say		
Antisocial behaviour	1	1.4
Only that I don't believe it will make any difference. I think that at street level everything that can be done is already being done. But in any event make the change, collect the data and then make a comparison.	1	1.4
More flexibility when it comes to issuing licenses in the area and their conditions	1	1.4
Why not just watch one episode of Night Coppers, is that the city you want? What about keeping residents safe, safe to be able to walk their own streets or open a window after 6pm? Safe to walk the streets from 6am. Safe from open drug dealing, noise, abuse, litter, bodily waste, 'no-go areas' and worse. Safe to know that the police aren't devoting 90% of their resources to mopping up commercial messes while the bar owners count the profits.	1	1.4
It makes no difference because the Council policy is ambiguous and designed to support premises to the detriment of residents	1	1.4
Policy is vague	1	1.4
This change feels very much like it's weighted in favour of more alcohol venues. The council do not do enough to keep residents safe and lessen the impact from	1	1.4

existing alcohol venues, why more?		
Plainer accessible language	1	1.4
Pay extra attention to the type of venue as some venues cause no problems	1	1.4
Needs to be based on size of venue to make sure the cost is not problematic	1	1.4
The new approach drives bars to be doing what they should be doing anyway, and moves the focus away from protecting residents from the ASB impact of bars. You seem to be encouraging more drinking and keeping the ASB on the streets. This is good for bars but bad for residents. Please remember that St James is unpoliced as it is, and this will make life unbearable for many of us.	1	1.4
I support the additional protections for women in the CSA, but I do not agree to the change of presumption to accept restaurant applications to open until 1am, particularly in the SSA. Neither do I agree to deliveries from late night take aways to 2am. No argument has been given for that change	1	1.4
From the info here, this seems a sensible approach	1	1.4
Pls limit any new licenses and overall seek to reduce them as they are withdrawn	1	1.4
As someone who lives on the seafront, the licensing of new spaces like Daltons, has had a negative impact on both flow of people as the exit venues but the level of noise has also increased, therefore replacing CIZ	1	1.4

when licenses are given out easily makes me worry for my own personal peace inside my home.		
Although some of the safety policies are to be commended I very strongly oppose the presumption to allow new licenses.	1	1.4
CSA does not add any help to the CIZ but makes it worse for residents. More community support officers and Police would help. How can extending licence hours keep people safe and able to work in the morning if they are kept up by noise well into the night?	1	1.4
Concerned that it reduces regulation and therefore safety for local residents.	1	1.4
Can something be done re the noise from "cruising" cars and motorbikes with very loud exhausts that are attracted to venues that are open late at night. I assume to "show off" to re the noise they make? They drive in from across the city to get to the central area, disturbing thousands of residents. In central London there are now some "sound cameras". These could be installed in densely populated brighton and hove too.	1	1.4
Will the CSA mean more Police then? And gating for narrow lanes where residents have no escape from crowds of drunk people and related ASB?	1	1.4
I'm concerned about the number of venues that are closing in our city. This seems like a smart	1	1.4

alternative to the current system.		
The whole idea of an area stopping licenses feels unnecessary when we've lost so many good venues.	1	1.4
I think it's a really good idea	1	1.4
I fully support the change.	1	1.4
Safety is key as us good management of licensed premises.	1	1.4
as a resident it is the cumulative impact that effects me. Obviously I think safety measures are important for people going to clubs and pubs but these should be a commercial and legal matter.	1	1.4
Total	70	100.0

How much do you support or oppose replacing the 'restaurant' category with 'food and dining'?

Response	Number	%
Support	18	25.7
Strongly support	16	22.9
Strongly oppose	14	20.0
Neither support or oppose	8	11.4
Oppose	7	10.0
No answer	7	10.0
Total	70	100.0

How much do you support or oppose replacing the 'late night takeaway' category with 'fast food premises'?

Response	Number	%
Strongly oppose	18	25.7
Support	17	24.3
Strongly support	12	17.1
Neither support or oppose	9	12.9
Oppose	7	10.0
No answer	5	7.1
Don't know	2	2.9
Total	70	100.0

How much do you support or oppose introducing a 'grassroots music venue' category?

Response	Number	%
Strongly support	27	38.6
Support	15	21.4
Strongly oppose	11	15.7
Neither support or oppose	8	11.4
Oppose	5	7.1
No answer	4	5.7
Total	70	100.0

How much do you support or oppose introducing a 'shared workspaces' category?

Response	Number	%
Neither support or oppose	21	30.0
Support	19	27.1
Strongly support	10	14.3
Strongly oppose	9	12.9
No answer	5	7.1
Oppose	4	5.7
Don't know	2	2.9
Total	70	100.0

Do have any additional comments about the proposed changes to the matrix categories and hours?

Response	Number	%
No	23	33%
We suggest that the matrix wording defining GMVs be amended to acknowledge that GMVs can be small or medium venues. We support the definition being met against membership of MVAB, MVT's Music Venues Alliance or similar. GMV live music cultural programming is risk-taking on talent development and as such will often incur financial risks. Because of this, many underwrite these financial losses with 'club' style events after gigs, on weekends or on key calendar dates. So, we hope that venues in the CSA and	1	1.4

SSA will still be able to apply for additional hours on their license or TENS and these applications will be considered and supported on their merits, as an important component of the GMV's viability. Later night 'club' style offerings at GMVs are also a valuable opportunity of diversification of programming that therefore enables audience diversification, development and growth.		
I support increasing music venues but not till 1pm. Midnight is an acceptable closing time. I can't see how allowing shared space working till midnight is a healthy thing to do	1	1.4
Re Fast food outlets - the delivery drivers are disrespectful of residents. We live in a twitten with a constant flow of riders using the lane as a cut through (because Google "says so"). They are gradually dislodging the paving bricks which are now noisy as they ride over them. When told it is a footpath we are met with indifference or are simple ignored. Being in the Old Town with it's burgeoning number of restaurants , it has been a relief that at least their licences are not so late, so at least the spill out onto the street is staggered ie. restaurents, then bars, then clubs.	1	1.4
Sussex Police welcome clarity around expectations of how premises will	1	1.4

<p>operate. We support diversity of premises within the city but are aware that applicants/operators will apply or amend their new application to make it 'fit' to one of the matrix types/timings to ensure it is granted. When visited post grant or some time later they are often breaching hours or conditions that they agreed to which requires enforcement work. It is hoped the new and amended matrix categories will give applicants a clear idea of the types of premises that will be supported within the city.</p> <p>The inclusion of specific expectations for certain matrix categories are also welcomed. Putting into policy requirements such as having a working kitchen in order to be considered as a café gives clear direction moving forwards. It might be worth this being listed as a requirement for 'food and dining' premises also.</p> <p>Regarding fast food premises, Sussex Police note the change in timings for the SSA and welcome a move to delivery only after 00:00. This stops persons congregating in public areas and becoming potential perpetrators or victims of crime. By allowing deliveries only until 02:00 it is hoped that people will be encouraged to head home away from risk areas and order food to their home address.</p>		
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Sussex Police were consulted on the hours as part of the pre-consultation process and are in support of the timings proposed.		
Live music, theatre or any other kind of performance should be supported.	1	1.4
Deliveries re food cause noise nuisance. Later eating and later drinking causes noise and public order issues. Asking staff to work later and later is no good for their health or their family.	1	1.4
Would need more info to comment further.	1	1.4
We feel it is imperative these new changes are put in place to support the longevity of existing long standing businesses in the city	1	1.4
In regarding to the "Grass root's music venue" - As I mentioned previously, you simply cannot have live music venues without the night club element. This change would mean the night club element could not exist & therefore the venues would close.	1	1.4
We welcome the updated matrix approach to licensing as an improvement on the current blanket restrictions in City Safe Areas (CSAs). However, greater flexibility should be applied to the proposed categories, which are currently too restrictive. The matrix should be revised to state:	1	1.4

<ul style="list-style-type: none"> • The food and dining category is restrictive and should remain defined simply as "restaurant" • Food and dining venues may obtain a licence without the requirement for substantial table meals, as this would limit the tenants able to occupy new developments • Pubs and bars may operate in the CSA, but with restricted opening hours to help manage antisocial behaviour <p>Further comments are provided in the Representation Letter issued by Quod on behalf of Ingka Centres.</p>		
<p>We have restaurants and small music venues local to us and we very strongly oppose them being open past midnight. We already experience the noise of drunken people late in the evening, with shouting, fighting, using the streets as a toilet etc. We already have cars parked illegally on pavements and on double yellow lines every evening. We already have the noise of bottles being cascaded into rubbish bins until gone midnight and then these being emptied into waste lorries very early in the morning. This proposal will mean all of this happening until an hour later, past 2am as the venues clear-up. This is alongside the noise of party's in airbnb venues etc. We very much support local music venues and musicians</p>	1	1.4

<p>but why do these need to be open past midnight? For instance we are regulars at the Verdict jazz club in Kemp Town which is a fantastic music venue, that always empties out before midnight. There is no need for music to happen in the early hours.</p> <p>We very much enjoy living in the centre of Brighton, where we are part of a vibrant local community. We greatly enjoy the fantastic and diverse cultural life, including the arts, restaurants etc. We know it is a lively tourist destination for holiday-makers, weekenders and day trippers but the Council must focus on sustaining or improving the quality of life for local residents, if you want it to be a living town. The presumption should be that midnight is late enough for music and restaurants and a very strong discouragement of binge drinking and anti-social behaviour. Also, we should not have to continually look out for licence applications that might impact us. The presumption should be for a quiet time between midnight and 7am to allow local residents time to enjoy their homes.</p>		
Grassroots music is a huge part of this city and something we should support	1	1.4
These are all sensible and considered changes	1	1.4
Extremely concerned at proposal to extend hours for fast food deliveries in	1	1.4

the SSA until 2 am, particularly in residential areas such as Central Hove.		
Oppose the change of hours for grassroots music venues across the city to midnight as this may disturb residents. Oppose strongly the fast food delivery until 2am as this will definitely disturb residents. Let's face it - who asks for food at 2am - not people who are sober.....	1	1.4
Yes, I do not agree to the change of hours for food and dining premises to 1am, grassroots music venues to 1am in the SSA or fast food deliveries. There are many residential areas in this city who just do not want or need late night opening. I refer particularly to the area I live, Central Hove ward.	1	1.4
Yes we do not agree to food and beverage venues opening until 1am, Grassroot music in SSA to 1 am and fast food outlets deliver to 4am.	1	1.4
Unsafe	1	1.4
Whilst it's great to see grassroots venues recognised, the conditions imposed on venues and businesses in the CSA are punitive and reductive. How are already struggling businesses meant to survive when licensing are so strict?	1	1.4
1 or 2am closures in will enhance the anti social behaviour even more	1	1.4
There is a huge amount of anti social behaviour, disturbance and littering as a result of the number of	1	1.4

venues we already have. Do we actually need more?		
Any change that increases the licencing hours in the Old Town is not supported.	1	1.4
<p>There is a real danger in allowing restuarants to stay open until 1am and that is that many of them will apply to bring in DJs and allow some dancing as a way of keeping people in their restaurants. The council have had applications like this in the past - for later hours, DJs etc in the CIZ - and refused them.</p> <p>Regarding food deliveries 2am is far to late for the SSA. This will disturb residents as motorbikes and cars tend to deliver at these late hours and so noise increases. Also doorbells going, doors opening and shutting. People and their families wish to sleep and the SSA is a heavily residential area. If businesses want deliveries after 11am they should have to go to a panel to decide this.</p> <p>Very supportive of grassroots music but not until 1am in the SSA as it's a heavily residential area and it wouldn't be fair on residents. This type of thing is much more suited to the city centre if it is to go on until late. 10 or 11am is more suitable for the SSA and such applications should go to a panel.</p> <p>Co-working spaces do not need to be open until midnight. Yes, it's great they have events but they</p>	1	1.4

can finish at 10pm. There is absolutely no need to go on until midnight - this would change the whole understanding of what a co-workspace is. There have been some co-working spaces applying for licences which have wanted cocktails etc at their bar - just introducing a bar by the back door with fewer conditions.		
It seems very strange that you are proposing all these changes when less people are going out because they can't afford to! And they are tending to eat earlier not later...so again the logic is bizarre to me..	1	1.4
Hours are already late enough. In terms of dining, we are not souther Europe and do not have culturally late dining habits. The only late night diners are drunks leaving pubs/clubs.	1	1.4
If the SSA is nearer residential property then I personally don't want businesses and especially music going on until midnight or after. As it is the areas around the current fast food premises seem to attract an excess of graffiti and rubbish.	1	1.4
'Shared workspaces' is shorthand for greedy landlords pretending to offer 'community' spaces while raking in profits from cafes and bars under false pretences. they snap up the spaces that could have been used by real businesses with real employees, driving them out of town.	1	1.4

The council supports antisocial behaviour through it's policies to increase access to alcohol late and to play loud music that disturbs residents.	1	1.4
Over complicated	1	1.4
I don't believe enough is done by the ones sat round a table making decisions in isolation about the impact in late to early morning hours closures have in residential homes. You need to revisit your defunct 'out of hour's' noise service and reinstate it back 7 nights a week if you're to implement these changes.	1	1.4
I think it needs flexibility depending on vituperation of venue and experience of licensee	1	1.4
<p>The new category for food and dining, opens the door to more of the establishments linked to ASB, such as the kebab shops and chicken shops that attract clubbers. We already know these places are hubs for ASB and drugs, and more of them in places like St James will make the area more threatening and unpleasant for residents. Our previous MP informed us that more clubs was part of his 'plan' for our area, but this is our home, and bar owners have a disproportionate voice as it is. If you cannot police these changes they will produce more ASB.</p> <p>We do need more venues for local talent and this is welcomed. The council has a love affair for tribute</p>	1	1.4

bands and has-beens, but we could do so much more to celebrate our creativity (rather than try to shut it down and kill it off as your events team is doing now). The co-working spaces feels like you are creating a loophole. Co-working spaces do not need to be open until midnight and do not need drinks licenses. Is this a way of slipping in yet more bars? Don't gaslight us any more than you do already please.		
The authority recognises the need for a SSA yet are advocating allowing live music until 1am. That is too late in residential areas such as Central Hove.	1	1.4
I strongly oppose licensing food and dining venues to 1am, fast food premises to 2am and music venues to 1am in the SSA. It is called the SSA for a reason!	1	1.4
If the changes allow for music to be played for longer then that can only be a good thing, and obviously if done responsibly	1	1.4
Shared workspaces do not need to serve alcohol	1	1.4
The overall statements you make in the policy do not support these extensions in opening hours. There are no arguments for a presumption to increase opening hours instead of the usual debate in front of a panel where safeguards and mitigation can be discussed.	1	1.4
In general, there are plenty of venues in Brighton and	1	1.4

Hove which have late licenses. Why extend into more residential areas? I need to get up early for work, so does my partner. We live behind a pub that turned into a live music venue. Already, we have to call (an often absent), manager and are constantly fobbed off with excuses when we complain about the level of noise from the venue. Extending their opening hours would make living next door insufferable and we would have to move. Whilst you acknowledge high levels of crime, the renaming of certain licence conditions does nothing to change this.		
No one needs to eat at 1am and delivery drivers on motorbikes in the early hours will be a disaster for local residents. Terrible idea.	1	1.4
Music venues are essential to the city	1	1.4
Violence is already horrific in the BN1 Ship street, West Street and Middle Street, so measures need to be in place to reduce crime, not encourage later times for groups e.g. Co working spaces and drinking.	1	1.4
Later licenses for restaurants is great, I would like later licenses for pubs and clubs as well.	1	1.4
We need later takeaways in the city there's nothing to eat after a certain time	1	1.4
Strongly support doing everything possible to support grassroots music venues	1	1.4

I fully support the proposed changes	1	1.4
A modern approach, focussed on safety with concern for residents too.	1	1.4
I am concerned that the streets outside and the fast food premises themselves become social scenes, and the aggravation that will cause to residents and others. I would be concerned about the litter from these fast food premises. Who would clear it up?	1	1.4
Total	70	100.0

Do you support or oppose the introduction of a good operator policy?

Response	Number	%
Strongly support	28	40.0
Support	16	22.9
Strongly oppose	14	20.0
Neither support or oppose	6	8.6
Oppose	4	5.7
No answer	2	2.9
Total	70	100.0

Do you have any comments about the proposed good operator policy?

Response	Number	%
No	18	26%
<p>I think that any well operated venue should be given strong consideration for alterations to their licenses. However I strongly do not think that later licenses should be granted. Pubs & bars need to close earlier in my opinion.</p> <p>As stated in my previous statements - Pubs/Bars staying open later are putting tremendous strain on nightclubs. If the night clubs close, shortly after Grass roots music venues will follow as venues cannot</p>	1	1.4

<p>pay their rent on the live music element alone.</p> <p>I also believe that the streets will become less safe as Pubs & bars are simply not equipped to handle certain incidents.</p>		
<p>Read the earlier comments. It is not about how a business is run but the behaviour of people around the site and the knock-on impact of rubbish clearance etc.</p>	1	1.4
<p>Compulsory CCTV with the council as the data controller</p>	1	1.4
<p>The licencing hours were given for a reason. Extending opening hours will only be detrimental to the city centre as once customers have left a venue, that venue has no responsibility over that customers behaviour. An example is a group leaving a pub, to walk 10 yards and then all needing to urinate so do so against a wall or a local resident's front door.</p>	1	1.4
<p>Caution will need to be had around this policy and expectations managed that just because the applicant meets the criteria for a 'Good Operator' does not automatically mean they will be granted what they apply for.</p> <p>We believe further explanation could be helpful within the explanatory notes to emphasise that the Good Operator Policy does NOT apply to new applications, only variations.</p>	1	1.4

There are venues that are well run and part of the city's music scene, it is fair that consideration to these venues is given when seeking to change licensing	1	1.4
Makes perfect sense.	1	1.4
Take digital I.D at every premise. I have seen this done first hand and it massively reduces disorder inside or within some distance of the venue. If someone knows they can be linked to that premise that has their digital ID then they move well away before causing trouble. Be careful of accepting fake IDs and strong management on the door is the only way (ask for additional ID like a driving license and copy of passport or bank cards). The emphasis must be on keeping everyone safe.	1	1.4
Who will oversee this?	1	1.4
If a venue can show an excellent track record we believe we should be able to extend our offer of service.	1	1.4
The first criterion of being a 'good operator' should be removed, as it does not take into account new or proposed developments that require flexibility in opening hours. The ability to vary trading hours is critical in determining which use classes are proposed within new developments. However, the proposed 'good operator' policy prevents applications to vary a premises licence until	1	1.4

buildings are completed and occupied, which creates an unnecessary barrier.		
<p>MVT is a best-practice organisation and gives our members tools and resources to ensure that their operational policies, in particular their adherence to licensing objectives, is thorough and woven into all operational procedures, so we support any licensing policy which works to recognise good work and conscientious thorough operators as we know our sector to be. Brighton has an exceptional network of very well established music venues and operators, but should a new grassroots music venue wish to establish themselves in BHCC we would like there to be the opportunity for clear and staged support to help the operator understand what it takes to be a 'good operator' within the licensing framework - Is there scope for interim recognition and support as new operators seek to build up to their 'five year' good operator threshold?</p> <p>Can you confirm that the good operator policy would extend to existing GMV operators opening new cultural venues in the Town, and that their history of good practice would support their applications for additional hours/ new licenses.</p> <p>If noise complaints are not</p>	1	1.4

substantiated, or are substantiated but come to a positive resolution can the licensing policy confirm that this will not go against any 'good operator' accreditation?		
Good operators should be rewarded for good practice and used as an example for new business	1	1.4
This is a fantastic way to encourage and promote high quality establishments	1	1.4
This is nonsense. Premises are licensed NOT operators.	1	1.4
This is nonsense as the premises are licensed not the operator. All this will achieve is an increase in the value of the premises.	1	1.4
Yes a license is issued to a property not a person so I do not really understand how this will work.	1	1.4
Any license rests with the property no manager so we cannot get how this would work.	1	1.4
Safer	1	1.4
Good, in theory, if Police Licensing actually support and work with these good operators. The wording being that they 'MAY be given more flexibility' sounds like an easy way to still reject logical and meaningful licensing changes.	1	1.4
While I recognise the value of well-run venues, I strongly oppose giving existing licence holders more flexibility to extend their hours simply because they have avoided formal issues in the past. A 'good	1	1.4

track record' doesn't necessarily mean a venue has no negative impact on the surrounding community, it can just as easily reflect gaps in reporting or enforcement. Extending hours in areas already under pressure from late-night activity risks increasing crime, anti-social behaviour and noise disturbance. Policies should prioritise protecting residents and reducing harm, not rewarding operators with longer opening hours.		
Good idea. Incentivise better behaviour	1	1.4
Any change that increases the licencing hours in the Old Town is not supported.	1	1.4
I find this a deeply concerning policy when you look closely at it. It sounds great - rewarding responsible business's, but how does it operate in practice. Having seen that we dont' have enough BHCC licensing officers and that we have a much reduced police team of licensing officers I can't see how it would be possible to know who all the good operators were especially as there have been some serious emergency reviews of premises which had been performing poorly for some time but the relevant authorities seemed unaware of it. Some of those premises have been closed down permanently . I suppose there is an incentive in that 'good operator' premises would	1	1.4

<p>find their licences gaining in value and owners could sell their premises on that basis so it would have to be that the good operator policy would only apply to the owner of the premises at that time.</p> <p>I noticed that Revolution in West Street - a very well-run, large premises is applying for a later licence as it has had TENS for a later time - all due to Pryzym being closed down. The police are objecting because it would mean quite a few venues in the vicinity all closing at the same time - 4am - and that would cause trouble. So, how would that scenario be managed in the future? There would have to be some strong ground rules! Also, this policy could invite corruption which would undermine licensing policy and objectives.</p>		
<p>Venues should already adhere to being responsible without being rewarded to do so. Standards of being a "good operator" Should apply at all times as a basic rule. perhaps venues should be fined / reprimanded instead for being a bad operator.</p>	1	1.4
<p>How do you define 'good management' and 'formal issues with the authorities' I read this as premises will do what they want unless they get a complaint. 1) Complaining is exhausting and it is up to the complainer to gather the proof and 2) it is difficult to complain to the Council.</p>	1	1.4

You are short staffed and difficult to get hold of due to reduced opening hours. Not your fault I hasten to add just a sign of the times. So for that reason I strongly oppose.		
Needs to be fair and include consultation with operators for input.	1	1.4
Another excuse to let profits dictate at the expense of community.	1	1.4
The council does not have the resources to assess if an operator is a good one and will take the word of the operator that they are. This expands on the council policy of encouraging premises to self police, to the detriment of residents	1	1.4
Needs more criteria- too easy to get around	1	1.4
This needs to look at the licensee and their complete background plus the building and its location. You really need to do your homework before you implement this.	1	1.4
Some concerns in allowing later opening via this route	1	1.4
How to keep track if operator changes is important	1	1.4
Good idea	1	1.4

Why reward bars for doing what they should be doing already. this is another loophole to push the envelope. You cannot enforce what you have now, so this will be a another disaster for residents. Bar owners are a very influential community, who are also very abusive to residents and rarely follow existing rules. This will be just another example of the chumocracy that is so obvious at the moment.	1	1.4
Fabulous addition	1	1.4
Seems to be a good approach	1	1.4
I don't think they should be permitted to extend	1	1.4
At present, noise complaints to the council follow a lengthy and invested approach by the person making the complaint, these complaints are usually abandoned due to the length of time and diary keeping needed, meaning nuisance venues are often not investigated fully (this is anecdotal) therefore my fear is operators who appear to be good operators are actually not and will be given more leniency.	1	1.4
rewarding good practice is positive	1	1.4
Licenses attach to a premises not an operator, unless I have missed a recent change in the law. All this does is increase the value of a premises which the so called „good operator“ can then go on to sell to any other operator.	1	1.4
It seems like a fig leaf and I	1	1.4

do not believe it will be successfully implemented from the point of view of complainants		
No operator, however good they are, can control what happens when people are leaving their premises. Have you seen hen and stag parties staggering round the streets?	1	1.4
seems sensible	1	1.4
Venues in BN1 are open late enough as it is. Venues away from residential streets, fine.	1	1.4
I think it would be good to include venues that have strong policies around sexual harassment, spiking, and safety. eg if there staff are well trained, they have safe spaces, and clear procedures.	1	1.4
We need to protect our venues and this makes sense.	1	1.4
Seems like a good idea	1	1.4
It's very important to have lots of vibrant licensed premises in Brighton and hove	1	1.4
I fully support the changes	1	1.4
A sensible policy - aiming for responsible management	1	1.4
Would the license pass from one operator to the next? ie is it to do with the place.	1	1.4
Total	70	100.0

Do you support or oppose licensed venues having clear, fair policies that promote inclusion and prevent discrimination?

Response	Number	%
Yes	59	84.3
Not sure	5	7.1
No answer	4	5.7
No	2	2.9

Total	70	100.0
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Do you support or oppose licensed venues having enhanced anti-spiking policies and training for staff?

Response	Number	%
Strongly support	46	65.7
Support	17	24.3
Neither support or oppose	4	5.7
No answer	3	4.3
Total	70	100.0

How much do you support or oppose licensed premises having safety-first door policies?

Response	Number	%
Strongly support	44	62.9
Support	13	18.6
Neither support or oppose	6	8.6
No answer	4	5.7
Don't know	2	2.9
Oppose	1	1.4
Total	70	100.0

How much do you support or oppose licensed premises having ID scanners?

Response	Number	%
Strongly support	26	37.1
Support	16	22.9
Neither support or oppose	10	14.3
Oppose	9	12.9
No answer	4	5.7
Strongly oppose	3	4.3
Don't know	2	2.9
Total	70	100.0

Are there any other safety measures you think should be required?

Response	Number	%
No answer	6	8.6
No	16	23
metal detectors - for knives etc	1	1.4
Something for needle spikibg	1	1.4
Address the drinking culture in the UK. Venues should be part of this.	1	1.4
One of the things you should encourage is that local businesses positively	1	1.4

engage with local residents, listening and responding to their concerns.		
Compulsory CCTV with the council as the data controller	1	1.4
Consider many people over 30 no longer carry cards or IDs with them on a night out.	1	1.4
Should be mandatory for digital CCTV in all licensed venues regardless of location	1	1.4
Safety is a collective concern for all who work in and utilise the nighttime economy and Sussex Police support a joined-up approach. Membership of community partnerships, harm reduction or safety schemes could be another possible requirement. The Brighton Crime Reduction Partnership (BCRP) has been in place in Brighton & Hove for around 20 years and is an essential resource for responsible operators. This has been placed as a condition on licences before but can also be voluntary. It may be that membership of the BCRP or other similar scheme is viewed positively on any new application or licence variation.	1	1.4
Safety measures should be in line with the premises business. If you run a club on West Street you probably need a lot of safety. If you are running a cinema less so.	1	1.4
High quality image CCTV inside and outside. Random dip sampling done at night on premises by council. If	1	1.4

the CCTV is off or not a clear picture then immediately close the venue and fine.		
Need more info to be able to answer fully.	1	1.4
No, however ID scanners are extremely expensive and not viable for smaller venues	1	1.4
I think after 23:00 everyone entering any venue should be subject to a search.	1	1.4
Safety should be paramount across all the council does in licensing	1	1.4
For people who Can Usually Not Typically Sustain behaviour should have banning orders. This is not aimed at stage or hens or other groups but identified individuals	1	1.4
How will these requirements be enforced and will the additional costs be recouped from operators?	1	1.4
Many of these are already in place voluntarily in the good clubs. Anything that prevents spiking would be more than welcome.	1	1.4
This is fine	1	1.4
More policing	1	1.4
Licensing should be providing venues with drinks toppers - they are very expensive for already struggling venues	1	1.4
Street lighting along Ship Street Gardens and Red Lion Twittens t's so dark and dangerous	1	1.4
More police presence at night especially foot patrols	1	1.4
Most of the above measures are already in place in licensed venues but there	1	1.4

<p>are some where staff training is poor etc. Scanners are a good idea but they don't always work and some venues have ended up having to write down people names and details which is why scanners gernerally aren't popular in the clubs. They are also quite intrusive and expensive. Generally the police insist on scanners where there are known issues.</p> <p>More work on preventing spiked drinks is a great idea and Suusex University were doign quite a bit of work on that.</p> <p>Most licensed venues are already fair and inclusive as they need customers especially in these challenging financial times. I strongly support diversity but feel it's already a very important part of this city and it's night life.</p> <p>Also, many of the clubs have recovery rooms and help people who are vulnerable although some of the rooms are better than others. The voluntary sector helps here too - to a very large extent!</p>		
greater police presence	1	1.4
It sounds like you want to create a vast new bureaucracy of rules and regulation. How on earth do you think staff will have the time or ability to enforce all this? Totally impractical I suggest	1	1.4
I fully support the changes	1	1.4
Full training for staff, however temporary	1	1.4
Would it not be simpler to	1	1.4

refuse serving customers alcohol before they get to the intoxicated state rather than after. Also 1) refuse entry to anyone who already intoxicated 2) refuse to sell alcohol in supermarkets etc to anyone who is intoxicated 3) What about a barred list with images circulated between venues? Or breathalyser tests?		
Staff trained in knowing signs of drugs essential	1	1.4
It's a matter of suitability - we should encourage smaller venues who might not have the resources nor the necessity for formal door policy	1	1.4
More Police	1	1.4
What about safety of the community? the non-students? the people who have to get up early for work? why are we so unimportant to you?	1	1.4
Facial recognition mandatory in all pubs clubs and late night food premises	1	1.4
Brighton being a vibrant multicultural city, you need to look at these alcohol venues that only fly rainbow flags during pride to attract money but fail in their inclusive support the other 50 weeks of the year.	1	1.4
Staff training in de-escalation of conflict.	1	1.4
Some of these ideas sound good but will place extra financial burden upon already struggling businesses. Who pays for these measures, will there	1	1.4

be a cut in business rates for licensed premises?		
Appropriate policing in areas of ASB to ensure that ASB is managed outside bars and clubs.	1	1.4
nightclubs i support but small indie pubs id not staff should be trained not to serve under age	1	1.4
responsibility rests with good behaviour..	1	1.4
Training in modern slavery, better links to beach patrol and safe spaces.	1	1.4
Licence holder should be on site and pence e withdrawn if not	1	1.4
More Police presence, with The Hippodrome opening, more measures in place to protect residents. It's ill thought out as it stands.	1	1.4
staff should have standardised training around sexual harassment. they should know what to do if they spot it, and how to respond if its reported. this should include staff feeling emboldened to bar customers who are harassing others, know who to contact, etc.	1	1.4
I'm not sure ID scanners are necessary for every venue.	1	1.4
The police should be responding to things better	1	1.4
It is what happens just outside pubs/clubs/venues that worries me, once the customer is off the premises they no longer seem to be the responsibility of the pub/club/venue. Any problem continues, without any protection.	1	1.4
Total	70	100.0

How important is it to you that licensed venues in Brighton & Hove actively promote equality, diversity, and inclusion?

Response	Number	%
Very important	37	52.9
Somewhat important	15	21.4
Not important at all	6	8.6
No answer	5	7.1
Not very important	4	5.7
Not sure	3	4.3
Total	70	100.0

How important is it to you that venue staff receive training about LGBTQ+ and TNBI communities?

Response	Number	%
Very important	35	50.0
Somewhat important	11	15.7
No answer	10	14.3
Not important at all	8	11.4
Not very important	3	4.3
Not sure	3	4.3
Total	70	100.0

Do you think venues should offer a way to report discrimination or harassment?

Response	Number	%
Yes	55	78.6
No answer	10	14.3
Not sure	4	5.7
No	1	1.4
Total	70	100.0

Are there any other steps you think venues should take to make LGBTQ+ and TNBI communities feel safe and welcome?

Response	Number	%
No answer	13	18.6
Not sure	5	7.14
No	20	28.6
signage inside explaining what help is available & how to report	1	1.4
Clear policy, training records, inclusion training during onboarding.	1	1.4
No other steps to put forward currently. Sussex Police actively encourage	1	1.4

reporting of incidents including hate crime from all communities and are continually improving ways for the public to do so.		
Venues should not discriminate against anyone. All venues should strive to be a safe place.	1	1.4
Dont treat them any differently from anyone else. They arent special and shouldnt be treated as such. What makes them more special and needy than anyone else?	1	1.4
Being good operators should cover this.	1	1.4
Accessible requirements are met where possible and graded for a point of reference for customers	1	1.4
The 2025 CGA Music Fans Voice survey, for which Brighton & Hove City Council was a supporting partner revealed that 94% of music fans said that they feel safe or very safe at a grassroots music venue. So we firmly believe that there is a safe and inclusive environment being offered by Brighton's GMVs, and that forums such as the MVAB meetings could be utilised to pilot any new initiatives or importantly hear ideas from the venues themselves and share best practices.	1	1.4
I think this is a tricky path to go down - once you start discriminating between different groups of people, people's own personal views, ideology and agendas may come into the frame - and policing that will	1	1.4

potentially be divisive. What happens when a member of staff simply decides they don't like the look of a customer...?		
Brighton needs to continue to be the LGBT capital it has been for years and this will help that	1	1.4
I don't know, I am not part of the community. I hope they feel included	1	1.4
No but venues need to ensure the safety of all customers	1	1.4
More policing	1	1.4
The council need to step-up and actually support local LGBTQ+ businesses and venues. Everything currently - and in this document - are performative. What practical steps at the council taking to actually support venues that are constantly subjected to homophobic and transphobic abuse? Where are the night marshals to support vulnerable people in the St James Street and Kemptown areas, where the majority of LGBTQ+ venues are? There are the highest concentration of street drinkers and public drug-taking, but it's local venues that have to deal with the issues they cause. And then the crimes these people commit are used against venues, as they then are deemed to operate in a 'high crime' area.	1	1.4
To be fair to the city I think there's already a very welcoming attitude to the LGBTQ+ community. It's	1	1.4

one of the hallmarks of the city's night life and Brighton is very proud of how inclusive thier night life is. Some gay bars have disapperaed in the last few years but that's mainly due to economic reasons as there's such competition in the city and cost have risen.		
greater police response	1	1.4
Advertising & Recruitment process should promote engagement by minorities.	1	1.4
Improve the importance of training in all venues	1	1.4
Advertise as such.	1	1.4
An inclusive atmosphere isn't necessary dependent on signage nor group specific training for every member of staff. A good venue will make everyone safe and welcome.	1	1.4
what about their responsibilities to make members of the community feel safe and welcome when walking past or waiting for a bus outside their venues?	1	1.4
Understanding door staff	1	1.4
Be inclusive all year round, not just during pride.	1	1.4
Positive and inclusive images on advertising etc.	1	1.4
More signage is not the way forward, especially in a small venue. We are becoming swamped in compliance signage.	1	1.4
i feel it's over the top every one should be made welcome what ever race or sexual orientation i've worked in the licensing industry for many years i've never seen any such issues	1	1.4
I think respect and courtesy go along way,	1	1.4

accepting everyone as they are		
Simple signs saying everyone is welcome	1	1.4
Not allow big groups of straight men	1	1.4
staff should be trained on inclusive language, and the ways different communities might react to harassment and abuse.	1	1.4
We need more queer spaces	1	1.4
Smiling confident door people.	1	1.4
Total	70	100.0

How much do you support or oppose high risk venues having clear procedures in place to prevent and respond to drink spiking, including staff training, incident reporting and victim support?

Response	Number	%
Strongly support	55	78.6
Support	9	12.9
No answer	4	5.7
Don't know	1	1.4
Neither support or oppose	1	1.4
Total	70	100.0

Do you support or oppose the enhanced focus on stopping violence against women and girls?

Response	Number	%
Strongly support	58	82.9
Support	9	12.9
Don't know	2	2.9
Neither support or oppose	1	1.4
Total	70	100.0

Do you support or oppose the inclusion of enhanced scrutiny and conditions for alcohol delivery services?

Response	Number	%
Strongly support	38	54.3
Support	14	20.0
Neither support or oppose	10	14.3
No answer	5	7.1
Don't know	2	2.9
Strongly oppose	1	1.4
Total	70	100.0

Do you have any further comments about alcohol delivery services?

Response	Number	%
No answer	12	17.1
No	31	44.3
I dont think it should be delivered	1	1.4
Better control of delivery drivers employed, IE not sub contract to the likes of deliveroo as venues lose control	1	1.4
Sussex Police will continue to scrutinise all applications for alcohol delivery services and the potential risks around these (particularly when it is solely alcohol delivery, not alongside food). We welcome the suggested conditions being included in policy for clarity and to indicate the minimum expected standard across the city.	1	1.4
Massively open to abuse. Do you think an illegal immigrant who hardly speaks a word of English is going to properly check IDs at a door etc...You must be kidding. Just look at what happens with your own deliveries! Delivery drivers serving alcohol should have special training and a certificate. Again this will be abused and fake people will use other peoples certificate to work and deliver the alcohol. Wake up top the real menace here of fake IDs and peoples dishonesty in a lot of the delivery drivers.	1	1.4
Should be stopped.	1	1.4
should only be with food	1	1.4
I suspect there are too many drivers in Brighton working without any legal right to work and this needs	1	1.4

to be checked by the employer		
I think that ID and no parks is a great idea but not sure about certified addresses as who decides this	1	1.4
I believe that Deliveroo and Uber should take more responsibility.	1	1.4
This is importantly. However, I wonder how this can be enforced. Will councillors on the licensing committee be able see the detailed records ? Will the delivery operators have to pay for this service which requires additional Council staff?	1	1.4
Ideally we would ban this. Essentially we are accommodating preloading	1	1.4
I thought that all these conditions were already in place. Maybe the face-to-face ID wasn't. Very supportive of this to discourage under-age drinking.	1	1.4
Important	1	1.4
I support the changes	1	1.4
Alcohol should be banned totally	1	1.4
Should be banned imo	1	1.4
Look around you. We need less alcohol, less drugs, less noise. the whole city is a cess pit. You want to run a party town, fine, don't expect people to work and live here and pay tax. Hopefully the students and AirBNB and club landlords will pay enough taxes to support you, while the adults and families and hard-working people just leave, taking their spending power, businesses and jobs	1	1.4

with them. Look at Europe, see how major cities are fighting back against this sort of tourism and the damage of the night time economy in favour of residents and a community that welcomes all ages. Why is Brighton so far behind? Carry on like this and this place that considers itself innovative will be another Blackpool soon. There is no sanctuary here for any normal citizen.		
Alcohol should not be available for delivery at any time	1	1.4
End delivery points need to know where the alcohol is being sourced from so they can make an informed choice to support local distilleries etc.	1	1.4
This could include supermarket deliveries it's a bit much	1	1.4
Not sure delivery of alcohol in necessary unless to a private address.	1	1.4
Nothing obvious, although I am concerned about the way in which party houses and non-licensed AirBnB (of which there are a lot) will benefit from a more relaxed approach to hours etc.	1	1.4
I don't think there should be any delivery service for alcohol	1	1.4
This is very important. I wonder whatever BHCC has the capacity to enforce this and how it will be monitored. How will the costs of monitoring be paid for.	1	1.4
Time limits	1	1.4

It's tough, but we do need to crack down	1	1.4
I wasn't aware that you could have alcohol delivered.	1	1.4
Total	70	100.0

Overall, do you think the proposed changes will:

Response	Number	%
Significantly improve safety and licensing	19	27.1
Somewhat improve the situation	17	24.3
Make little difference	15	21.4
Somewhat worsen the situation	8	11.4
Significantly worsen the situation	5	7.1
No answer	5	7.1
Don't know	1	1.4
Total	70	100.0

Do you have any concerns about the proposed changes?

Response	Number	%
No answer	19	27.1
no	7	10
Please refer to Representation Letter issued by Quod on behalf of Ingka Centres	1	1.4
Please include safety and inclusion for all folk living with disabilities including hidden disabilities. This is a problem in many venues across the city.	1	1.4
Overemphasis on ID	1	1.4
The 1pm closing /later closing will increase ASB and increase nuisance for local residents	1	1.4
No concerns, I think it's important to ensure that Brighton keeps it commercial element alive, there are too many pubs and venues closing down due to costs, they need	1	1.4

support		
<p>As explained in previous questions, Sussex Police do have some concerns around the removal of the cumulative impact area / policy but welcome the focus on safety.</p> <p>Regarding the question 'How much do you support or oppose high risk venues having clear procedures in place to prevent and respond to drink spiking, including staff training, incident reporting and victim support?' we would suggest that ALL venues should have clear procedures in place, not just 'high risk' venues. We ensures a unified approach to VAWG not based on venue size, timings or audience demographic.</p>	1	1.4
Worried that The Police will not change and object any relaxation of existing rules	1	1.4
<p>Dont treat LGBT any different... they arent any different from other people who also experience violence. Be careful of being conned into believing all women are sweet, innocent and vulnerable...they aren't all like that. Women can be just as aggressive as men and commit many acts of disorder. Ask night time taxi drivers and doorstaff re this very subject... they see how women behave in 2025. Be careful in just focusing on women and LGBT.</p>	1	1.4
Yes	1	1.4

Only requirements for ID scanners as beyond our venues financial or actual requirements	1	1.4
As previously stated, you seem to be creating a vast new bureaucracy which will place huge pressures on employers and may simply end up with venues closing because of difficulties in complying - the night time economy will end up being a police state.	1	1.4
Private companies not taking responsibility	1	1.4
<p>The presumption in favour of extending hours is not based on any evidence . In fact the evidence included in the review would suggest a tightening of the restrictions would be more appropriate.</p> <p>The sections on preventing discrimination do not include any reference to discrimination on the basis of race or ethnicity. On the face of it this would appear a clear and obvious breach of the council's statutory responsibilities under the Equality Act, 2010</p>	1	1.4
You have not asked about increasing hours across the city at all in this consultation which I find astonishing. The extension of hours is not argued for anywhere in the policy. Quite the opposite, in fact BH has a 20% higher incidence of alcohol related deaths than the UK average (as set out in your own document) and you are planning to increase the	1	1.4

alcohol availability across the city....irresponsible in my opinion. Also, where is the section on race discrimination?		
Yes, later opening hours are most definitely not welcome in our residential areas.	1	1.4
Yes later opening hours for Grassroots music and food and beverage outlets. Not acceptable in residential areas.	1	1.4
Not enough policing	1	1.4
Lack of any practical support for LGBTQ+ venues - just performative lines about inclusion and diversity without meaningful change	1	1.4
It is unclear if this will dramatically increase the amount of licensed premises.	1	1.4
Yes, I have written many of my concerns down. All the Safety measures sound great but in reality there will be a major dependence on the voluntary sector once people have left late night venues . There's Beach Buggy Patrol which is invaluable - Night Owls etc.etc. Is BHCC putting more money into this voluntary sector help? I suspect not. It would be great to have the Beach Buggy Patrol operate on a Thursday night as well. They actually save lives. I don't understand the increased hours for restaurants, deliveries, live music venues, co-working places have been arrived at. Where's the evidence that supports doing this? I	1	1.4

haven't seen any. I am all for the safety of women and girls as there is an extraordinary amount of sexual harassment of women and girls that goes on in clubs and bars but also in the street when these venues empty. Deeply shocking and the beach is a very dangerous place indeed late at night. I support diversity and inclusion but the city does it so well already so do we just need to help encourage more venues to cater to the LGBTQ+ community.		
without police response they are meaningless once people leave the venue. residents continue to suffer.	1	1.4
As explained I have a strong objection to the proposed extensions to opening hours. I also think that local residents should be notified of any proposed changes in licensing. We should not have to monitor all applications in case they impact us. Aside from this the proposals seem positive.	1	1.4
Just that it may be a tick box exercise - a lot is being asked of the people on the 'shop floor'	1	1.4
I have given my views, but this feels like the council is appeasing a powerful lobby group to the detriment of residents. We cannot control ASB now, and these proposals will make things worse for us.	1	1.4
Any new venue demands should be proportional. A small venue which has	1	1.4

created an inclusive and safe atmosphere/environment without the need for door staff, signage or compulsory staff training in how to sensitively deal with certain groups shouldn't have the same demands placed on them as another larger venue with issues.		
The only concern would be the overuse of ID which could step over a line in relation to privacy. There would need to be greater clarity about the use of ID.	1	1.4
Yes already stated. Council does not have enforcement resources to encourage premises to extend hours and amplified entertainment AND look after the welfare of residents. This council focused on minority groups relating to gender and sexual orientation but has no regard for minorities such as neuro diverse autism and ADHD where over stimulation (loud music penetrating their home) is incredibly stressful.	1	1.4
Overly complicated. Focus on operators - good operators reduce crime bad operators bend the rules for profit only and cause most issues	1	1.4
It's all in the planning and delivery of this change and how you communicate it. The council are notoriously known for implementing change without open and honest collaborative working and hide behind a communication process that	1	1.4

is fundamentally flawed.		
Only that area should go north slightly not stopping at st peters but include some of London rd	1	1.4
Residual concern over later opening near residential areas.	1	1.4
Impact on smaller licensed premises may be disproportionate	1	1.4
It could go further	1	1.4
Yes I have huge concerns about the later licenses for restaurants specially in the SSA, as well as 1am for live music venues and 2am for fast food premises deliveries.	1	1.4
Yes in the hours should not be extended in the SSA	1	1.4
Leniency on licensing	1	1.4
it risks just being more bureaucracy .. thd whole issue is about personal responsibility and behaviour.. sadly la cking	1	1.4
The presumption in favour of new licenses in the CSA is a major worry for me. While food led premises are an improvement over alcohol led premises, the overall impact is still an increase in alcohol outlets . The policy document nowhere justifies this. In fact it argues the opposite by quoting allocator related deaths in B&H as 20% higher than England average.	1	1.4
Extending licensing hours for local live music venues is a particularly bad idea. I don't understand why 1am is required. Most people have to go to work and shows finish before 12 for that reason. If people need	1	1.4

to keep drinking and dancing there are plenty of venues in the city already		
Yes, please dont extend licensing hours or allow early hours delivery drivers.	1	1.4
Who will police this and how will they have powers	1	1.4
Later licencing	1	1.4
i think safety training needs to be consistent, mandatory, and standardised	1	1.4
The pressure to drink more alcohol is not good for the health of the nation.	1	1.4
Total	70	100.0

What do you think is the most positive aspect of the proposed changes?

Response	Number	%
No answer	18	25.7
the proposals' relating to lone females	1	1.4
supporting local business to thrive in a difficult climate and enhancing the cites nightlife as well as employment	1	1.4
Increased safety measures for women and vulnerable people	1	1.4
Focus on women's & girls	1	1.4
The discouragement of venues that contribute to binge drinking and all the resulting disgusting behaviour and harm.	1	1.4
A drive towards equity.	1	1.4
Rewarding responsible operators	1	1.4
Emphasis on safeguarding / inclusivity /and violence against women and girls	1	1.4
Not the blanket assumption of refusal	1	1.4
A clear focus on safety in the city centre which is Sussex Police's highest recorded crime area for violent crime during Marble	1	1.4

hours. More accountability on operators to have good policies and procedures in place to protect and care for the public.		
Digital I.D	1	1.4
Safety	1	1.4
Recognition of GMVs as a distinct part of Brighton's licensed venue offer, culture and economy is an extremely positive initiative, one that we are confident will result in better supported, well resourced GMVs that have more tools needed to thrive and develop.	1	1.4
Really important to keep Brighton safe and welcoming to people for nights out	1	1.4
The improved level of flexibility applied to the determination of license applications as opposed to the current blanket approach.	1	1.4
Safety and good operators	1	1.4
The support for business	1	1.4
A safety first approach	1	1.4
the VAWG section and anti spiking sections though I think training on modern slavery could be added to make it stronger.	1	1.4
Better protection for women, girls and LGBT	1	1.4
Better safety	1	1.4
The good operator scheme, IF Police Licensing actually stick to it	1	1.4
Additional safety measures are sensible	1	1.4
Most positive is the focus on Safety but there is little here to show how that will be addressed. A policy on spiked drinks is great - just	1	1.4

ensure the one that is already there is actually used. Encouraging live music. Improved training of staff.		
Safety having a bigger priority	1	1.4
The later licenses	1	1.4
That females have a safe space and the fact that they are physically more vulnerable than men has been recognised.	1	1.4
Increased safety for vulnerable people	1	1.4
Women's safety	1	1.4
Good Operator Policy	1	1.4
The flexible nature	1	1.4
more flexibility to issue premises licenses in the CIZ	1	1.4
That there are clear guidelines in place, making it clear that some behaviours are unacceptable, therefore encouraging accountability.	1	1.4
Welfare of women and girls	1	1.4
It won't make a difference. Too many buddy operators do what they want without action	1	1.4
Holding alcohol licenced venues accountable...but that only works with a 'proactive approach' from the council as apposed to the reactive way it work now to alcohol venues and noise.	1	1.4
Reduce hopefully antisocial behaviour and increase safety	1	1.4
Focus on safety, good practice and training of staff.	1	1.4
Addressing spiking	1	1.4
Better safety measures inside bars and clubs.	1	1.4
More flexibility for venues,	1	1.4

more restaurants in the nighttime economy and enhanced safety		
Better protection for women and girls and LGBT+ community	1	1.4
Protection of women and girls	1	1.4
Specific training for targeted communities in the zone	1	1.4
raising awareness	1	1.4
The BVAWG section and the section on spiking. However I worry about how all of this will be managed / enforced / policed.	1	1.4
Training and raising awareness of issues those running establishments should already be keenly aware of.	1	1.4
Traing for VAWG	1	1.4
Shows that these things are important	1	1.4
Protecting women and girls	1	1.4
more safety around VAWG and LGBTQIA+ people	1	1.4
the training schemes.	1	1.4
Total	70	100.0

Are there any important issues that have not been adequately addressed?

Response	Number	%
None	21	30
No answer	5	7.1
Disability and Vulnerability.	1	1.4
Clear CCTV in premises and outside. High definition. Storage of data standards i.e all data kept for 45 days min. Lighting outside premises so the images are crystal clear. Fake IDs and massive awareness and enforcement around this subject.	1	1.4
How much money will these changes cost the Council?	1	1.4

Will you spend any money on training and information? What are the Council going to do to make this change?		
Safety and inclusion for all folk living with a disability. More needs to be done.	1	1.4
The automatic assumptions that more is problematic - the people are here anyway - spread the load	1	1.4
Making the street safer for women	1	1.4
I think this covers the issues.	1	1.4
The hippodrome will cause chaos for the immediate local residents. If even later license is taken this will have an even worse impact on late night ASB.	1	1.4
<p>Given that understanding is growing between the subsequent link between poor planning and noise complaints and BHCC already recognises the Agent of Change principle in local planning policy, there is an opportunity to tie the two cause & effect together, and knit the Agent of Change principle into environmental health policy.</p> <p>85% of the Music Fan Voice responders surveyed said that they agree with the statement that there should be laws introduced so that people who move into areas near music venues cannot make complaints about noise related to a venue.</p>	1	1.4
Please refer to Representation Letter	1	1.4

issued by Quod on behalf of Ingka Centres		
Taxis accepting closed takeaways food in evenings	1	1.4
Inadequate consideration given to the impact of the proposals on residential areas in the SSA	1	1.4
As above - racial discrimination and the longer hours are not justified across the city. Plus the presumption in favour of new premises is also not supported by the policy document.	1	1.4
LGBT	1	1.4
<p>Encouraging the regeneration of our dying nighttime economy. This council needs to look to Manchester, and how they achieved this:</p> <ul style="list-style-type: none"> * A Night Mayor who worked across statutory bodies to implement positive and meaningful changes * Purple flag recognition * Better and more frequent late-night transport so people can get home safely * More presence on streets at night by first aiders and night marshals * Promotion of the different nighttime districts (for Brighton, this could be - Kemptown, the Seafront, The Laines, etc.) 	1	1.4
While I welcome the stronger emphasis on safety, inclusion and safeguarding, I am concerned that several of the proposed changes particularly replacing the	1	1.4

<p>Cumulative Impact Zone with a City Safety Area and introducing the good operator policy risk weakening existing protections for residents. This is already a high-harm area with serious and persistent issues around crime, anti-social behaviour and alcohol-related harm. Shifting away from a precautionary approach and giving operators more flexibility could make these problems worse, not better.</p> <p>Enhanced safety initiatives and training are positive steps, but they will only be effective if they are backed by strong, consistent enforcement and genuine accountability. A safer, more inclusive night-time environment must not come at the cost of increased noise, disruption and harm to those who live and work in the area. Protecting the community must remain the highest priority.</p> <p>In addition, the council must address practical safety concerns on the ground. Installing proper street lighting along the two twittens where I live is essential. These routes are currently poorly lit and feel unsafe at night. Better lighting would help deter anti-social behaviour, reduce the risk of harm, and make a tangible difference to residents' sense of security.</p>		
Reduction in overall crime and antisocial behaviour	1	1.4

resulting from drunken behaviour		
As I have said, I can't see where the rationale is for the more generous hours for some businesses and that is a deeply worrying omission. Also, all applications for a licence in the central area of the city - the present CIZ - really do need to go to a panel if there's an objection. It can't just be assumed they are allowable under the new matrix. There's some good ideas here but a lot of potential downsides too.	1	1.4
violence on the streets once people have been ejected from or left a venue.	1	1.4
Impact of drugs in the city & greater consumption.	1	1.4
Front of venue tidiness and noise	1	1.4
Drinking for the sake of getting drunk isn't being addressed. It is that cultural mindset that needs to be tackled. Prevention rather than forever dealing with the aftermath.	1	1.4
Off Sales	1	1.4
Flexibility in allowing unusual venues to easily obtain a license. Eg a gallery might have a second income stream by occasionally hosting small gigs, supper clubs, film nights, community events where selling alcohol is intrinsic to the success of the event. Having smaller non traditional venues having the option to sell alcohol would help bring people into town who aren't just out to get drunk.	1	1.4

More Police	1	1.4
Yes, focusing all of your energies on creating a cut price night time Ayia Napa is a bad idea. See how the rest of Europe is swiftly moving away from this model as you continue to embrace it.	1	1.4
Licensing and noise enforcement	1	1.4
Make clubs accountable for the public before sending them out on the streets- they get them as drunk as possible quickly before closing and then letting the rest of the town deal with the problem.	1	1.4
Robust impact assessments on how these changes will affect home, lives and families living in the new proposed zones	1	1.4
Use of noisy vehicles (especially petrol motorbikes) and a licencing requirement to have a planned transition to the use electric bikes for noise pollution and wider sustainability reasons.	1	1.4
Street drinking and obvious drug taking and street dealing - this is what makes Brighton feel unsafe to residents and particularly visitors	1	1.4
Reasonable rules for vertical street drinking outside pavement license	1	1.4

The lack of policing in St James and the area is a major problem now. Not only do we have a LOT of addicts, we have clubbers opening dealing/taking drugs in residential streets and using them as public toilets. This problem is worsened by events sanctioned by the council (like on the beach) which are not professionally run or adequately policed. the lack of capability in the council itself to manage these issue is a significant risk, and needs to be addressed if you want to implement these proposals (and lets be honest, you will do that whatever residents think).	1	1.4
The reasoning to permit later opening,	1	1.4
More visible police presence at all times in city	1	1.4
Easy routes for complaints from residence, no mention of holiday rentals and Airbnb rentals and their governance	1	1.4
what about violence against young men...	1	1.4
Community impact of extending opening hours for all food led premises and deliveries to 1 am / 2am respectively. This will be felt across the whole city. Also there is no mention of race in the discrimination section of the policy.	1	1.4
The likely impact on residents to extending licensing hours.	1	1.4
Listen to residents who live in the area. It is a high density residential area and	1	1.4

the proposals will have a significant impact on peoples' quality of life and sleep.		
Noise pollution	1	1.4
Bigger venues in the centre. Re kick out times	1	1.4
No I believe all issues have been addressed.	1	1.4
the cumulative impact on the city.	1	1.4
Total	70	100.0

What best describes your sex and gender?

Response	Number	%
No answer	34	48.6
Male	18	25.7
Female	17	24.3
Prefer not to say	1	1.4
Total	70	100.0

Is the gender you identify with the same as your sex registered at birth?

Response	Number	%
Yes	36	51.4
No answer	34	48.6
Total	70	100.0

How would you describe your ethnic origin?

Response	Number	%
No answer	34	48.6
White: English, Welsh, Scottish, Northern Irish, British	29	41.4
White: Other	4	5.7
White: Irish	2	2.9
Prefer not to say	1	1.4
Total	70	100.0

Which of the following best describes your sexual orientation?

Response	Number	%
No answer	35	50.0
Heterosexual / Straight	19	27.1
Gay Man	7	10.0
Prefer not to say	3	4.3
Lesbian / Gay woman	2	2.9
Bisexual / Bi	2	2.9
No answer	1	1.4

Queer	1	1.4
Total	70	100.0

What is your religion or belief?

Response	Number	%
No answer	35	50.0
I have no particular religion or belief	12	17.1
Atheist	9	12.9
Christian	8	11.4
No answer	4	5.7
Other philosophical belief	1	1.4
Buddhist	1	1.4
Total	70	100.0

What is your age?

Response	Number	%
No answer	35	50.0
55 - 64	9	12.9
65 - 74	9	12.9
45 - 54	9	12.9
No answer	4	5.7
25 - 34	2	2.9
35 - 44	1	1.4
16 - 24	1	1.4
Total	70	100.0

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

Response	Number	%
No answer	35	50.0
No	26	37.1
Yes, a little	5	7.1
Yes, a lot	2	2.9
No answer	2	2.9
Total	70	100.0

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Statement of Licensing Policy Review 2026
Directorate:	City Operations
Service:	Regulatory Services
Team:	Licensing
Is this a new or existing activity?	Existing
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Sarah Cornell, Senior Licensing Officer and Emily Fountain, Licensing Officer
Accountable Manager:	Alex Evans, Licensing Team Leader
Additional stakeholders collaborating or contributing to this assessment:	

3. About the activity

Briefly describe the purpose of the activity being assessed:

Section 5 of the Licensing Act 2003 requires a licensing authority to prepare and publish a statement of its Licensing Policy, reviewed 5 yearly. Such a policy must be published before the authority carries out any function in respect of individual applications and notices made under the terms of the Licensing Act 2003. The policy sets out the general approach to make licensing decisions, whilst remaining consistent with the provisions of the Licensing Act 2003.

The licensing objectives are set out in the Act and are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

This Equality Impact Assessment has been conducted to ensure that Brighton & Hove City Council Statement of Licensing Policy (SoLP) complies with the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010. The assessment evaluates the potential impacts of the licensing policy on protected characteristic groups and proposes mitigation measures where necessary.

[Statement of Licensing Policy 2026 \(draft\)](#)

The city has high levels of cultural participation with the proportion of people that engaged with the arts from May 2023 to March 2024 was 93.80%. This is higher than the South East (92.71%) and England (90.42%). Brighton & Hove is known for its vibrant and interesting arts and creative industries which attract tourism and new businesses. The sale and consumption of alcohol contributes greatly to the city's economy and tourism.

After careful consideration the Licensing Authority has decided to re-designate the area formerly covered by the Cumulative Impact Zone (CIZ) as a City Safety Area (CSA) in order to make safety the overriding focus and priority in and around licensed venues. In doing so the Licensing Authority's objective is to maximise protection for everyone participating in the night-time economy, particularly people visiting, working and living in the city centre. It is recognised that cumulative impact continues to be a feature of the CSA but by careful scrutiny of licence applications and mandating robust safety policies the Licensing Authority's aim is to improve safety by reducing levels of crime, disorder and public nuisance (and their associated harms) and so promote the licensing objectives within the CSA. Through this revised approach, the Licensing Authority will seek to promote a diverse range of venues within the city centre, Alcohol-related death rates in Brighton & Hove are not significantly different to the national average.

In 2023, Brighton & Hove recorded 112 alcohol- related deaths, giving an age-standardised rate of 47.3 per 100,000 population which is similar to the England average of 40.7 per 100,000

However, Brighton & Hove has higher than national average levels of adults binge drinking on their heaviest drinking day, adults drinking over 14 units per week, and dependent drinkers, according to latest available data. And the city experiences local problems such as pre- and post- loading, binge drinking, and street drinking created by cheap alcohol and fierce, localised price competition, particularly between off-licence stores and supermarkets.

[Sussex Police Crime Data Set for BHCC Statement of Licensing Policy 2025 Review Appendix E](#)

Based on Sussex Police Beat areas the highest volumes of violent crimes and intoxication between 01/01/2022 – 31/12/2024 were in Regency (CC1003) where there were 2 292 violent occurrences involving intoxication, St Peter's & North Laine (CC1004) with 1 609 occurrences and Queen's Park (CC2005) with 1 094 occurrences. This is inclusive of all occurrences within both the Operation Marble DPA timings and the non-Marble days and hours over the 3-year period. [Appendix E - Sussex Police data set](#)

Due to the large concentration of licensed premises and night clubs in the centre of Brighton, a high proportion of the Division's violent crime and serious sexual offences are committed within a relatively small area. The Division receives a large influx of visitors to the city centre at weekends. Many of these people attend the pubs and night-clubs during nighttime hours and as a result an enhanced policing operation (with Directed Patrol Activity – DPA) is provided, called Operation Marble.

In line with statutory requirements and the council's Public Sector Equality Duty the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between all people. This includes people who share protected characteristics, including but not limited to LGBTQIA+ people, disabled people, people from diverse ethnic and cultural backgrounds and people of all faiths and none.

What are the desired outcomes of the activity?

- To update and review the council's Statement of Licensing Policy in accordance with statutory requirements
- To ensure the policy effectively supports the four licensing objectives
- To ensure the policy remains relevant to the local area and responsive to emerging issues
- To engage with stakeholders and incorporate feedback to improve the policy
- To provide clear guidance for licensees, applicants, and the public about licensing decisions

Which key groups of people do you think are likely to be affected by the activity?

- Licensed premises operators and management
- Personal licence holders
- Local residents living near licensed premises
- Visitors to licensed venues
- Vulnerable groups including children, elderly residents, and disabled people
- Community safety partners and emergency services

- Local businesses and the night-time economy sector
- Tourism and hospitality sectors
- Various equality groups with specific needs regarding licensed premises

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

A Licensing Summit was held on 10th January 2025 attended by 44 various stakeholders, including venue representatives, residents, business owners and Sussex Police licensing. We asked for people's views on the nighttime economy in Brighton & Hove. The attendees were asked 3 questions about the nighttime economy and their responses were recorded on the Your Voice platform.

An informal consultation asking the same three questions was opened up to the wider public via the Your Voice platform between the 20th January and 23rd February 2025. A further 113 people completed this survey. The equalities data collected during this survey is recorded throughout the EIA.

Formal consultation on the SoLP for 2026-2031 commenced on 8th August 2025 and closed on the 12th October 2025. 70 people took part in the online Your Voice consultation. The equalities data collected is recorded throughout the EIA.

Highlights from those responses:

The consultation highlighted strong support for equality, diversity and inclusion in licensed venues, with particular emphasis on the needs of disabled people (including those with non-visible disabilities and neurodivergent people) and LGBTQ+ communities. Respondents called for practical measures to improve accessibility, such as venue grading and clear information, and for ongoing, visible support for LGBTQ+ inclusion beyond symbolic gestures. There is a clear expectation that staff should be trained in both disability awareness and LGBTQ+ inclusion, and that venues should have robust policies and reporting mechanisms to prevent discrimination and harassment.

How important is it to you that licensed venues in Brighton & Hove actively promote equality, diversity, and inclusion?

Response	Number	%
Very important	37	52.9
Somewhat important	15	21.4
Not important at all	6	8.6
No answer	5	7.3
Not very important	4	5.7
Not sure	3	4.3

Total	70	100.0
<p>Consultation with statutory consultees: Chief Officer of Sussex Police, East Sussex Fire & Rescue, bodies representing local holders of premises licences, bodies representing local holders of club premises certificates, bodies representing holders of personal licences, bodies representing businesses and residents and the child protection agency. Consultation with Licensing Strategy Group (council officers, responsible authorities, trade, residents associations) Consultation via the council's consultation platform Your Voice Consultation via the council's website</p> <p>E-mail with a link, inviting the organisations to participate in the survey, was sent to the organisations representing the following groups: Learning Disabilities (Adults) - Speak Out Learning Disability (children) - Amaze LGTBQ Young People – Allsorts LGBTQ adults (Switchboard) Women – Brighton Women's Centre Autism – Impact Initiatives Trust for Developing Communities Community Works Hangleton & Knoll Project Disability – Possibility People Black & Racially Minoritised Communities – Bridging Change</p> <p>We have not engaged with Armed Forces veterans and their families, Expatriates, Migrants, Asylum Seekers and Refugees and the homeless although these groups may intersect with those above.</p>		

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity?
Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	State YES / NO / or not applicable
Disability and inclusive adjustments, coverage under equality act and not	State YES / NO / or not applicable
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	State YES / NO / or not applicable
Religion, Belief, Spirituality, Faith, or Atheism	State YES / NO / or not applicable
Gender Identity and Sex (including non-binary and Intersex people)	State YES / NO / or not applicable
Gender Reassignment	State YES / NO / or not applicable
Sexual Orientation	State YES / NO / or not applicable
Marriage and Civil Partnership	State YES / NO / or not applicable

Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	State YES / NO / or not applicable
Armed Forces Personnel, their families, and Veterans	State YES / NO / or not applicable
Expatriates, Migrants, Asylum Seekers, and Refugees	State YES / NO / or not applicable
Carers	State YES / NO / or not applicable
Looked after children, Care Leavers, Care and fostering experienced people	State YES / NO / or not applicable
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	State YES / NO / or not applicable
Socio-economic Disadvantage	State YES / NO / or not applicable
Homelessness and associated risk and vulnerability	State YES / NO / or not applicable
Human Rights	State YES / NO / or not applicable
Another relevant group (please specify here and add additional rows as needed)	State YES / NO / or not applicable

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

To address the gaps in equality data, we will:

- Include equality monitoring questions in our consultation process where appropriate and proportionate
- Analyse available data from council sources on demographics of local areas where licensed premises are concentrated
- Work with Public Health and Community Safety teams to gather relevant data on alcohol-related impacts across different demographic groups
- Engage with community organisations representing various protected characteristics to understand specific concerns
- Review complaints and representations made about licensed premises to identify any patterns affecting specific groups

There are also wider council policies and strategies with a wider remit that address the needs of individuals with protected characteristics, including those related to women's safety, safeguarding, age protection, sexual health, anti-racism and disability, which can serve as valuable tools for highlighting gaps in equality data and shaping equality considerations.

Further information regarding these policies and strategies can be found via the following links:

[New strategic direction for tackling violence against women and girls, domestic abuse and sexual violence](#)

[Brighton & Hove City Council plan 2023 to 2027: Outcome 2: A fair and inclusive city](#)

[Fair and Inclusive Action Plan 2023 - 2027](#)

[Anti-Racism Strategy 2023 to 2028](#)

[Accessible City Strategy 2023 to 2028](#)

[Age and Dementia Friendly Brighton & Hove](#)

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

- An informal engagement is planned to assess the impact of the new policy, approximately 24 months past-implementation
- Regular engagement with the key stakeholders to monitor emerging equality concerns.
- Feedback mechanisms for licensees and the public to report equality concerns.
- Analysis of any complaints made about licensed premises that highlight equality issues.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.

- For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
 - **Consider a wide range (including but not limited to):**
 - [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
 - [Census](#) and [local intelligence data](#)
 - Service specific data
 - Community consultations
 - Insights from customer feedback including complaints and survey results
 - Lived experiences and qualitative data
 - [Joint Strategic Needs Assessment \(JSNA\) data](#)
 - [Health Inequalities data](#)
 - Good practice research
 - National data and reports relevant to the service
 - Workforce, leaver, and recruitment data, surveys, insights
 - Feedback from internal 'staff as residents' consultations
 - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
 - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
 - Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES/ NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

[Age Census Data - 2021](#)

Brighton & Hove has a younger age structure than England:

20.5% of people are aged under 20 (23%)

65.5% aged 20-64 (58%)

14.1% aged 65+ (18%)

Brighton and Hove has a very different age profile compared to the South East and England.

- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)
- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)
- Fewer older people aged over 66 (13%) – South East (17%), England (16%)

The Licencing Authority's approach outlined in the draft [Statement of Licensing Policy 2026](#) means that the Licensing Authority will support: diversity of premises: ensures that there is a mix of the different types of licensed premises and attracts a more diverse range of customers from different age groups, different communities and with different attitudes to alcohol consumption. It gives potential for positively changing the ambience of the city or an area of it. This will have a positive effect in reducing people's fear of crime and in increasing the number of evening visitors to the city centre.

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data results re. age:

What is your age?

79 out of 118 (67%) responded to this question with the results being as follows:

16 to 24

6.3% (5)

25 to 34

20.3% (16)

35 to 44

21.5% (17)

45 to 54

13.9% (11)

55 to 64

20.2% (16)

65 to 74

16.5% (13)

75 to 84

1.3% (1)

Formal consultation on the SoLP for 2026-2031- Equalities monitoring data 70 participants re age.

What is your age?

No answer 55.7% (39)

65 - 74, 12.9% (9)

55 - 64, 12.9% (9)

45 - 54, 12.9% (9)

35 - 44, 1.4% (1)

25 - 34, 2.8% (2)

16 - 24, 1.4% (1)

Public Health team used data relating to Age in the [Brighton and Hove Drugs and Alcohol Needs Assessment \(D&ANA, 2022\)](#).

[Safe and Well at School Survey \(SAWSS\) 2023](#) which pertains specifically to school-age children and young people.

According to the Needs Assessment there were 88 under 18 year olds receiving specialist drugs and alcohol treatment in 2021-2022.

The alcohol specific hospital admission rate for Children and Young People is higher at 53 per 100,000 than the England average of 29 per 100,000.

Sussex Police have continuing concerns that, despite staff training in age-restricted sales, under age individuals are still being served alcohol both on and off the premises in some of the city's licensed premises.

Licensees should note the concern of the authority that drink related disorder frequently involves under 18's. To prevent illegal purchases of alcohol by such persons, all licensees should work with a suitable 'proof of age' scheme and ensure that appropriate identification is requested prior to entry and when requesting alcohol, where appropriate. Appropriate forms of identification are currently considered to be those recommended by the Home Office, police, trading standards officers and their partners (for example passport, photo driving licence or Proof of Age Standards Scheme PASS card). The advent of digital identification will bring new technologies and challenges which responsible authorities and licensees will need to be mindful of and have a personal responsibility to remain informed and trained on.

The following details and measures are intended to address the need for the protection of children from harm; this includes emotional and physical harm, which may be associated with licensed premises and certificated club premises (for example the exposure too early to strong language and sexual expletives, for example in the context of film exhibitions or where adult entertainment is provided). It is intended that the admission of children to premises holding a premises licence or club premises certificate should normally be freely allowed without restricting conditions (unless the 2003 Act itself imposes such conditions or there are good reasons to restrict entry or to exclude children completely).

It is the licensing authority's expectation that all staff responsible for the sale of intoxicating liquor receive information and advice on the licensing laws relating to children and young persons in licensed premises. Licensed premises staff are required to take reasonable steps to prevent under age sales. The licensing authority will not seek to limit the access of children to any premises unless it is necessary for the prevention of emotional or psychological harm to them. Each application will be considered on its own merit but particular areas that will give rise to concern in respect of children are to be found below.

To reduce alcohol-induced problematic behaviour by under 18 year olds, to enforce underage purchase and drinking laws and to assist in the protection of children from harm, the licensing authority supports the following measures:

- a). Police should exercise powers (Confiscation of Alcohol (Young Persons) Act 1997) to remove alcohol from young people on the street
- b). Police and trading standards should implement test purchasing to reduce sales to under 18s in on and off sales licensed premises
- c). Further take-up of proof of age schemes will be promoted
- d). In-house, mystery shopper type schemes operated by local businesses will be supported
- e). Providers of events specifically catering for unaccompanied children should consider whether all staff at such events need to be DBS checked
- f). Use of a Public Spaces Protection Order (PSPO) in the City Centre

Applicants shall copy their applications to the Director of Children's Services in their capacity as the responsible authority. Copies should be sent care of the Police. The "What to do" booklet is a national one and can be accessed at: www.brightonandhovelscb.org.uk/wp-content/uploads/What-to-do-if-a-child-is-being-abused.pdf If there are concerns locally about a child, the Multi-Agency Safeguarding Hub (MASH) can be contacted on 01273 290400 or Sussex Police on 101. If a child is in immediate danger 999 should be dialled.

Trading standards and the police undertake ongoing enforcement operations around under-age sales and test purchasing. Sussex Police and Brighton Crime Reduction Partnership (BCRP) undertake work concerning proxy purchases and counterfeit ID as part of the partnership support work with Community Safety and Trading Standards.

Trading standards have a programme of business support including training for local businesses to avoid underage sales. The training also covers identifying fake IDs, Challenge 25, intoxication, proxy purchasing and implementing due diligence measures.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to [Disability](#), considering our [anticipatory duty](#)?

YES/NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census Data 2021

Nearly one in five residents (51,797 people, 19%) in Brighton & Hove are disabled as defined by the Equality Act. This is higher than seen in both the South East (16%) and England (17%). Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited 'a lot' and for three in five (31,446 people, 61%) their activities are limited 'a little'. Both proportions are similar to what is seen in the South East and England.

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data re disabilities:

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

80 out of 118 (67.8%) responded to this question as follows:

70% answered 'No' (56)
17.5% answered 'Yes a little' (14)
6.3% answered 'Yes a lot' (5)
2.5% 'Preferred not to say' (2)
3.7% No answer (3)

Do any of your conditions or illnesses reduce your ability to carry out day to day activities?

80 out of 118 responded to this question.

Respondents confirmed one or more of the following as follows:

6.3% 'Physical Impairment' (5)
5% 'Long standing illness' (4)
5% Learning disability/difficulty' (4)
2.5% answered 'Autistic Spectrum' (2)
1.3% answered 'Sensory Impairment' (1)
1.3% answered 'Other' (1)
3.8% 'Preferred not to say' (3)

81.3% No answer (65)

Formal consultation on the SoLP for 2026-2031 - Equalities monitoring data 70 participants re disability.

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

No answer - 52.9% (37)

No - 37.1% (26)

Yes, a little - 7.1% (5)

Yes, a lot - 2.9% (2)

Summary of the formal consultation responses around disability and accessibility

- Respondents highlighted the need for greater consideration of safety and inclusion in many venues across the city for disabled individuals, particularly those with non-visible disabilities such as autism and ADHD.
- Concerns were raised about overstimulating environments, such as loud music in public venues, which can penetrate people's homes and can be especially distressing for neurodivergent individuals. Additionally, there was a perception that while the council has focused on issues affecting gender and sexual orientation groups, it has not given sufficient attention to the needs of neurodivergent communities.
- The importance of addressing both disability and vulnerability was emphasized.
- More needs to be done to ensure safety and inclusion for all disabled people.
- Accessible requirements are met where possible and graded for a point of reference for customers.

In line with statutory requirements the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

The draft SoLP states the following:

Operational Standards for Licensed Venues - All licensed venues should meet the following minimum standards:

Policy Transparency: Admission and service policies should be documented, publicly accessible, and demonstrably non-discriminatory. While reasonable conditions may apply (dress codes, intoxication restrictions), policies should explicitly prohibit exclusion based on gender expression, gender identity, sexual orientation, perceived sexuality, or other protected characteristics.

Physical Accessibility: Where structurally feasible, venues should provide gender-neutral facilities and conduct access audits addressing barriers faced by disabled and LGBTQ+ individuals.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Both the informal and formal consultations on Your Voice used description of pictures and road details for maps to improve accessibility.

Screen readers can be used with Your Voice and the system complies with Web Content Accessibility Guidelines (WCAG) 2.2 AA accessibility standards. Details about Your Voice accessibility can be found on the [Go Vocal website](#).

Paper copies - If a paper copy was required, it was possible to export a pdf version of a survey. Your Voice can scan-read completed paper forms and include these in the reporting and analysis.

Your Voice is available in English and 10 other languages if required.

Brighton & Hove City Council's accessibility statement for the website is available to read here: [Accessibility statement](#).

The Statement of Licensing Policy has been converted from a PDF document into an HTML page that can be read in browser as PDF documents are not accessible; the HTML is this page: [Statement of Licensing Policy 2026 \(draft\)](#). The HTML page separates the information up into sections so it's easier to read. The appendices have also all been converted into HTML pages.

The HTML page has several adjustments to make information more accessible including:

- Headings and subheadings tagged so they can be recognised by screen readers
- Bullet point lists
- Descriptive hyperlinks

The SoLP is accessible and can be read by screen readers like JAWS and NVDA. If users need the information in another format they can request this: [How to request content in an accessible format](#).

We also have additional information on accessibility and our content style guide: [Why accessibility matters](#).

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES/NO
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census 2021 –

More than a quarter of residents (72,272 people, 26%) are 'BME' (non-White UK/British). Higher than seen in the South East (21%) but similar to what is found in England (27%). Despite the overall number of residents only increasing by 1% since the last Census. The number of 'BME' residents has increased by over a third (35%, 18,921 people).

Other White

- More than a third of 'BME' residents are other White (26,812 people, 37%).

- Other White residents make up nearly one in ten of all residents (9.7%).
- The number of other White residents has increased by 7,288 people (37%)

Mixed ethnicity

- Nearly a fifth of 'BME' residents are of mixed ethnicity (13,228 people, 18%)
- Residents of mixed ethnicity make up one in twenty of all residents (4.8%)
- The number of residents of mixed ethnicity has increased by 2,820 people (27%)

Asian / Asian British

- Nearly a fifth of 'BME' residents are Asian (13,217 people, 18%)
- Asian residents make up one in twenty of all residents (4.8%)
- The number of Asian residents has increased by 1,939 (17%)

Black / Black British

- Nearly 8% of 'BME' residents are Black (5,458 people, 7.5%)
- Black residents make up one in fifty of all residents (2%)
- The number of Black residents has increased by 1,270 people (30%)

Arab

- Nearly one in twenty of 'BME' residents are Arab (3,049 people, 4.2%)
- Arab residents make up over one in 100 of all residents (1.1%)
- The number of Arab residents has increased by 911 people (42%)

Health Counts is a health and wellbeing survey of Brighton & Hove residents conducted around once a decade. The findings highlight health and lifestyle issues, revealing inequalities across the city. This evidence informs the Joint Strategic Needs Assessment (JSNA) and local strategies to improve health and wellbeing and reduce inequalities. The 2024 survey, funded by Brighton & Hove City Council's Public Health Department, had a weighted sample of 16,729 adults - 7.2% of the resident population aged 18 or over. Health Counts results shown that 24% of population were Black and Racially Minoritised (Non-White British), similar to the 2021 Census at 26%.

Summit and informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

How would you describe your ethnic origin? 78 out of 118 – (66.1%) responded to this question. Out of the 78 the responses were as follows:

White: English, Welsh, Scottish, Northern Irish, British
66.3% (53)

White: Other
8.8% (7)

Mixed: Any other mixed / multiple ethnic background
6.3% (5)

Mixed: Asian and White
5% (4)

Prefer not to say
2.5% (2)

Other Ethnic Group: Arab
1.3% (1)

White: Irish
1.3% (1)
Mixed: Black Caribbean and White
1.3% (1)
Black / Black British: Other (please share details below)
1.3% (1)
Black / Black British: Caribbean
1.3% (1)
Asian / Asian British: Other (please share details below)
1.3% (1)
Asian / Asian British: Indian
1.3% (1)

Formal consultation on the SoLP for 2026-2031- Equalities monitoring data 70 participants re ethnicity.

How would you describe your ethnic origin?

No answer - 48.6% (34)
White: English, Welsh, Scottish, Northern Irish, British, - 41.4% (29)
White: Other 5.7% (4)
White: Irish 2.9% (2)
Prefer not to say 1.5% (1)

From the Public Health Drug & Alcohol EIA - Amongst users of drug and alcohol treatment services in 2021-22, 11% were from Black and Racially Minoritised backgrounds. The policy must have due regard to the PSED. Each application must be considered on its merits. The Licensing Authority must not discriminate on the grounds of ethnicity.

Our [draft SoLP](#) states the following under Section 10, **Integration of Strategies**:
In line with statutory requirements, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES/ NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census 2021 -

Over a half of residents (152,966 people, 55%) have no religion or belief. Significantly higher than seen in the South East (40%) England (37%) and the highest proportion of residents with no religion in England (upper tier local authorities).
19,760 residents (7.1%) did not answer the question

Compared to the South East and England, Brighton and Hove has proportionally - More – Buddhists (2,455 people, 0.9%), Jews (2,455 people, 0.9%), and other religions (2,860 people, 1.0%) - Fewer - Christians (85,629 people, 30.9%), Hindus (2,100 people, 0.8%) and Sikhs (378 people, 0.1%) and Muslims (3.1%)

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

What is your religion or belief?

80 out of 118 responded 67.8% - Out of the 80 the responses were as follows:

I have no particular religion or belief

52.5% (42)

Christian

22.5% (18)

Atheist

8.7% (7)

Buddhist

2.5% (2)

Hindu

1.3% (1)

Jewish

1.3% (1)

Muslim

1.3% (1)

Agnostic

1.3% (1)

Other philosophical belief

1.3% (1)

Other religion or belief, please describe

1.3% (1)

Prefer not to say

3.8% (3)

No Answer

2.5% (2)

Formal consultation on the SoLP for 2026-2031- Equalities monitoring data 70 participants re religion or belief.

No answer 50.0% (35)

I have no particular religion or belief 17.1% (12)

Atheist 12.8 % (9)

Christian 11.4% (8)

No answer 5.7% (4)

Other philosophical belief 1.4% (1)

Buddhist 1.4% (1)

There were no disproportionate impacts identified in the consultation.

Positive impacts in the Draft SoLP:

- Section 10.1.1 mentions religious and faith groups in equality commitments.

- Crime prevention targets religiously motivated crimes (11.2)
- Diversity of premises approach (3.4.1) could support venues catering to different faiths
- Non-alcohol-led venues explicitly valued (3.4.4c)

Potential negative impacts:

- Alcohol-focused policy may not reflect needs of abstaining communities
- Consultation list (1.4.1) doesn't explicitly include faith organizations

Potential mitigations:

- Increase engagement with faith organizations in future monitoring and consultation
- Support non-alcohol venues and alcohol-free events
- Staff training on religious/cultural sensitivity (add to 1.9.2 framework)
- Recognize religious festivals and considerations in licensing

The policy must have due regard to the PSED. Each application must be considered on its merits. The Licensing Authority must not discriminate on Religion, Belief, Spirituality, Faith, or Atheism.

Our [draft SoLP](#) states the following under Section 10, **Integration of Strategies**:

In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

6.5 Gender Identity and Sex:

Does your analysis indicate a disproportionate impact relating to [Gender Identity](#) and [Sex](#) (including non-binary and intersex people)?

YES/NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

[Census 2021 -](#)

Gender Identity - At least one in a hundred residents aged 16+ (1.0%, 2,341 people) identify as Trans (England 0.5%).

In 2021 there was estimated to be 141,000 female (51%) and 135,400 male (49%) and residents in the city. Apart from those aged 19 to 21, there is a relative even distribution (+/- 3 percentage points) of males and females across all ages up until the age of 75 years. In the age group 19 to 21, 56% (9,900 people) are female and 44% male (7,900 people). The difference is likely due the higher proportion of female students to male students attending Brighton University and Sussex University.

Similar to the picture seen in England, beyond the age of 75 years the proportion of female residents increases. There are an estimated 18,000 residents aged 75 or older, of which 59% (10,500 people) are female and 41% (7,500 people) are male. By the age of 90 or older the difference is more two to one with 1,500 female (66%) to 700 male (34%) residents.

In 2021 a new question on gender identity was included in the Census. It was added to provide the first official data on the size of the transgender population in England and Wales. The question was voluntary and was only asked of people aged 16 years and over. People were asked "Is the gender you identify with the same as your sex registered at birth?" and had the option of selecting either "Yes" or "No" and writing in their gender identity. The five local authorities with the highest proportion of the population aged 16 years and over who identified as non-binary were all outside London. Brighton and Hove had the highest percentage (0.35%).

From the Health Counts 2024 Survey: 5% TNBI (Trans, non-binary or intersex). Higher than the 2021 Census at 1% of adults. 28% LGBTQ+ (Lesbian, gay, bisexual, asexual, queer or prefer another term to describe their sexual orientation but are not heterosexual). Higher than the 2021 Census at 11% of adults.

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

What best describes your sex and gender?

80 out of 118 67.8% responded to this question as follows:

Male
52.5% (42)
Female
41.3% (33)
Prefer not to say
3.8% (3)
Non-binary
1.3% (1)
No answer
2.6% (2)

Formal consultation on the SoLP for 2026-2031- Equalities monitoring data 70 participants re sex and gender

What best describes your sex and gender?

No answer 48.6% (34)
Male 25.7% (18)
Female 24.3% (17)
Prefer not to say 1.4% (1)

Relevant Highlights from the formal consultation

Do you support or oppose the enhanced focus on stopping violence against women and girls?

Response	Number	%
Strongly support	58	82.9
Support	9	12.9
Don't know	2	2.9
Neither support or oppose	1	1.4
Total	70	100.0

Support for Enhanced Focus on Stopping Violence Against Women and Girls

Findings:

- **Overwhelming Support:** Over 95% of respondents support or strongly support this focus.
- **Positive Feedback:** Many praised the safeguarding emphasis as overdue and necessary.
- **Practical Measures:** Calls for staff training, anti-spiking policies, and safe spaces.
- **Inclusive Safety:** Some respondents urged broader focus to include other vulnerable groups.
- **Enforcement:** Requests for visible enforcement and support outside venues.

Public Health Drug & Alcohol Strategy EIA - To inform the development of the strategy, the Public Health team used data relating to Gender Identity and Sex from the Brighton and Hove Drugs and Alcohol Needs Assessment (2022). The data shows that 63% of all Service Users in 2021/22 were male. However, women may find it harder to access drugs and alcohol treatment due to specific concerns such as fear of losing their children, or stigma. They may also find it difficult to access man-dominated environments due to disproportionate experiences of Domestic Abuse and Sexual Violence. From hospital admission data, inpatient episode rates of intentional self-poisoning are significantly higher for women in Brighton and Hove (62.8 per 100,000) compared to England (38.6 per 100,000).

The policy must have due regard to the PSED. Each application must be considered on its merits. The Licensing Authority must not discriminate on the grounds of sex or gender.

Under Section 1.9 of our [draft SoLP](#) it outlines the following:

Enhanced LGBTQ+ and Inclusion Standards for Licensed Venues

1.9.1 Policy Commitment - Brighton and Hove City Council is unequivocally committed to fostering Inclusive Communities through our council plan. This commitment necessitates comprehensive equality and inclusion frameworks across all council functions, with attention to our licensing responsibilities. Our objective is to measurably enhance quality of life and accessible opportunities for all residents, workers, and visitors, with specific recognition of the historical and ongoing challenges faced by our LGBTQ+ and TNBI (Trans, Non-Binary, and Intersex) communities.

As licensing authority for one of the South East's highest concentrations of licensed venues, we recognise our responsibility to protect vulnerable communities from discrimination while fostering economic vitality and cultural vibrancy

Operational Standards for Licensed Venues - All licensed venues should meet the following minimum standards:

- **Policy Transparency:** Admission and service policies should be documented, publicly accessible, and demonstrably non-discriminatory. While reasonable conditions may apply (dress codes, intoxication restrictions), policies should explicitly prohibit exclusion based on gender expression, gender identity, sexual orientation, perceived sexuality, or other protected characteristics.
- **Staff Training:** All customer-facing personnel should complete training on equality obligations and inclusive service delivery, including LGBTQ+ terminology, pronoun usage, and incident response protocols. Training records should be maintained for inspection.

• **Complaints procedures:** Venues should implement accessible reporting mechanisms for discrimination experiences, with staff trained to address incidents of transphobia, homophobia, and biphobia.

• **Physical Accessibility:** Where structurally feasible, venues should provide gender-neutral facilities and conduct access audits addressing barriers faced by disabled LGBTQ+ individuals. This framework serves as both a commitment to our diverse communities and an accountability mechanism for measuring progress toward genuine inclusion within Brighton and Hove's licensed venues.

Section 3.4.4(c) - Matrix Approach: LGBTQ+ and TNBI venues explicitly recognized as activities which the Licensing Authority values and wishes to encourage.

Our [draft SoLP](#) states the following under Section 10, **Integration of Strategies:**

In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to [Gender Reassignment](#)?

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In 2021 a new question on gender identity was included in the [Census](#). It was added to provide the first official data on the size of the transgender population in England and Wales. The question was voluntary and was only asked of people aged 16 years and over. People were asked "Is the gender you identify with the same as your sex registered at birth?" and had the option of selecting either "Yes" or "No" and writing in their gender identity. The five local authorities with the highest proportion of the population aged 16 years and over who identified as non-binary were all outside London. Brighton and Hove had the highest percentage (0.35%).

Based on a voluntary question from the 2021 Census;

- In Brighton & Hove a total of 220,742 residents (93.8%) of the population aged 16 years and over answered the question.
- A total of 218,401 residents (92.8%) answered "Yes", indicating that their gender identity was the same as their sex registered at birth.
- A total of 2,341 residents (1.0%) answered "No", indicating that their gender identity was different from their sex registered at birth. Within this group:
 - 476 (0.2%) answered "No" but did not provide a write-in response
 - 362 (0.1%) identified as a trans man
 - 329 (0.1%) identified as a trans woman
 - 1,174 (0.5%) wrote in a different gender identity

[From the Health Counts 2024 Survey:](#) 5% of the survey identified as TNBI (Trans, non-binary or intersex).

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

Is the gender you identify with the same as your sex registered at birth?

15 out of a 118 12.7% answered this question as follows

Yes

13.8% (11 choices)

No

2.5% % (2 choices)

Prefer not to say

2.5% (2 choices)

Formal consultation on the SoLP for 2026-2031- Equalities monitoring data 70 participants answered the question re gender identify (Is the gender you identify with the same as your sex registered at birth?) as follows:

Yes 51.4% (36)

No answer 48.6% (34)

From Drug & Alcohol Strategy EIA

Of the 23 participants in the People with lived Experience workshops for whom this information was captured, seven participants identified as trans. Feedback identified specific barriers for trans people in accessing drugs and alcohol support, in particular where accessing treatment may impact on gender reassignment treatment. It also highlighted the importance of specific trans-inclusive spaces to facilitate access to support, including diversity of staff and volunteers.

The policy must have due regard to the PSED. Each application must be considered on its merits. The Licensing Authority must not discriminate on the grounds of gender reassignment.

Under Section 1.9 of our draft SoLP it outlines the following:

Enhanced LGBTQ+ and Inclusion Standards for Licensed Venues

1.9.1 Policy Commitment - Brighton and Hove City Council is unequivocally committed to fostering Inclusive Communities through our council plan. This commitment necessitates comprehensive equality and inclusion frameworks across all council functions, with attention to our licensing responsibilities. Our objective is to measurably enhance quality of life and accessible opportunities for all residents, workers, and visitors, with specific recognition of the historical and ongoing challenges faced by our LGBTQ+ and TNBI (Trans, Non-Binary, and Intersex) communities.

As licensing authority for one of the South East's highest concentrations of licensed venues, we recognise our responsibility to protect vulnerable communities from discrimination while fostering economic vitality and cultural vibrancy

Operational Standards for Licensed Venues - All licensed venues should meet the following minimum standards:

- **Policy Transparency:** Admission and service policies should be documented, publicly accessible, and demonstrably non-discriminatory. While reasonable conditions may apply (dress codes, intoxication restrictions), policies should explicitly prohibit exclusion based on gender expression, gender identity, sexual orientation, perceived sexuality, or other protected characteristics.

- **Staff Training:** All customer-facing personnel should complete training on equality obligations and inclusive service delivery, including LGBTQ+ terminology, pronoun usage, and incident response protocols. Training records should be maintained for inspection.
- **Complaints procedures:** Venues should implement accessible reporting mechanisms for discrimination experiences, with staff trained to address incidents of transphobia, homophobia, and biphobia.
- **Physical Accessibility:** Where structurally feasible, venues should provide gender-neutral facilities and conduct access audits addressing barriers faced by disabled and LGBTQ+ individuals. This framework serves as both a commitment to our diverse communities and an accountability mechanism for measuring progress toward genuine inclusion within Brighton and Hove's licensed venues.

Section 3.4.4(c) - Matrix Approach: LGBTQ+ and TNBI venues explicitly recognized as activities which the Licensing Authority values and wishes to encourage.

Our [draft SoLP](#) states the following under Section 10, **Integration of Strategies:**

In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to [Sexual Orientation](#)?

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

At least one in ten (25,200 people, 10.6%) residents aged 16+ identified as LGB+ (gay or lesbian, bisexual or other minority sexual identity) (3%)



Based on a voluntary question from the 2021 Census:

- Around 189,745 people (80.6%) identified as straight or heterosexual.
- Around 25,247 people (10.6%) identified with an LGB+ orientation (Gay or Lesbian, Bisexual or Other sexual orientation).
- The remaining 20,375 people (8.7%) did not answer the question.
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is three times higher than seen in both the South East (3.1%) and England (3.1%).
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is the highest proportion seen in any upper tier authority in England.

From the Health Counts 2024 Survey: 28% LGBTQ+ (Lesbian, gay, bisexual, asexual, queer or prefer another term to describe their sexual orientation but are not heterosexual). Higher than the 2021 Census at 11% of adults.

Informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

Which of the following best describes your sexual orientation?

80 out of 118 67.8% responded to this question as follows:

Heterosexual / 'Straight'

53.8% (43)

Gay man

18.8% (15)

Bisexual/Bi

8.8% (7)

Lesbian / Gay woman

2.5% (3)

Queer

1.7% (2)

Asexual

0.8% (1)

Prefer not to say

5.1% (6)

No answer

3.8% (3)

Common Themes from the formal consultation:

Training and Policy: Emphasis on staff training for inclusion and awareness, with clear and enforced policies.

Reporting Mechanisms: Support for visible and accessible ways to report discrimination or harassment.

Consistent Inclusivity: Inclusivity should be demonstrated year-round, not just during events like Pride.

Atmosphere and Representation: Welcoming environments through signage, advertising, and inclusive language.

Community Engagement: Suggestions for council support, including night marshals and safer streets

Diverse Views: Some prefer equal treatment for all, while others advocate for proactive inclusion.

How important is it to you that venue staff receive training about LGBTQ+ and TNBI communities?

Response	Number	%
Very important	35	50.0
Somewhat important	11	15.7
No answer	10	14.3
Not important at all	8	11.4
Not very important	3	4.3
Not sure	3	4.3
Total	70	100.0

The policy must have due regard to the PSED. Each application must be considered on its merits. The Licensing Authority must not discriminate on the grounds of sexual orientation.

Under Section 1.9 of our draft SoLP it outlines the following:

Enhanced LGBTQ+ and Inclusion Standards for Licensed Venues

1.9.1 Policy Commitment - Brighton and Hove City Council is unequivocally committed to fostering Inclusive Communities through our council plan. This commitment necessitates comprehensive equality and inclusion frameworks across all council functions, with attention to our licensing responsibilities. Our objective is to measurably enhance quality of life and accessible opportunities for all residents, workers, and visitors, with specific recognition of the historical and ongoing challenges faced by our LGBTQ+ and TNBI (Trans, Non-Binary, and Intersex) communities.

As licensing authority for one of the South East's highest concentrations of licensed venues, we recognise our responsibility to protect vulnerable communities from discrimination while fostering economic vitality and cultural vibrancy

Operational Standards for Licensed Venues - All licensed venues should meet the following minimum standards:

- **Policy Transparency:** Admission and service policies should be documented, publicly accessible, and demonstrably non-discriminatory. While reasonable conditions may apply (dress codes, intoxication restrictions), policies should explicitly prohibit exclusion based on gender expression, gender identity, sexual orientation, perceived sexuality, or other protected characteristics.

- **Staff Training:** All customer-facing personnel should complete training on equality obligations and inclusive service delivery, including LGBTQ+ terminology, pronoun usage, and incident response protocols. Training records should be maintained for inspection.

• **Complaints procedures:** Venues should implement accessible reporting mechanisms for discrimination experiences, with staff trained to address incidents of transphobia, homophobia, and biphobia.

• **Physical Accessibility:** Where structurally feasible, venues should provide gender-neutral facilities and conduct access audits addressing barriers faced by disabled and LGBTQ+ individuals. This framework serves as both a commitment to our diverse communities and an accountability mechanism for measuring progress toward genuine inclusion within Brighton and Hove's licensed venues.

Section 3.4.4(c) - Matrix Approach: LGBTQ+ and TNBI venues explicitly recognized as activities which the Licensing Authority values and wishes to encourage.

Our [draft SoLP](#) states the following under Section 10, **Integration of Strategies:**

In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful discrimination, and to promote equality of opportunity and positive relations between persons of diverse backgrounds.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Based on a voluntary question from the [2021 Census](#):

Only a third of Brighton & Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership. This is significantly lower than seen in the South East (48%) and England (45%). Among residents married or in a civil partnership, 3,867 residents (5%) are in a same sex marriage or civil partnership.

Among all residents aged 16 or older, 3,867 people (1.6%) are in a same sex marriage or civil partnership. This is three times higher than seen in the South East (0.4%) and England (0.4%) and proportionally the highest number of residents in a same sex marriage or civil partnership in England (upper tier local authorities).

[Census 2021 -](#)

33% of residents aged 16+ are married or in a civil partnership (45%)

52.2% Never married/civil partnership (38%)

2.0% Separated (2%)

8.8% divorced/civil partnership dissolved (9%)

4.2% widowed / surviving civil partnership partner (6%)

From the [Health Counts 2024](#) Survey: 35% selected married or in a civil partnership. Similar to the 2021 Census at 33%

Summit and informal consultation for the 2025 review of the Statement of Licensing Policy (SoLP) equalities monitoring data

What is your legal marital or registered civil partnership status?

80 out of 118 people responded to this question as follows: 67.8%

Never married and never registered in a civil partnership

41.3% (33 choices)

Married

25% (20 choices)

In a registered civil partnership

11.3% (9 choices)

Divorced

7.5% (6 choices)

Separated but still legally married

1.7% (2 choices)

Formerly in a civil partnership which is now legally dissolved

1.3% (1 choice)

Widowed

1.3% (1 choice)

No answer

10% (8 choices)

The review of the SoLP has not identified any disproportionate impact on individuals relating to Marriage or Civil Partnership. The policy is applied consistently and equitably, with no evidence suggesting adverse effects specific to this protected characteristic. The Council remains committed to promoting equality and inclusion across all groups.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The review of the SoLP has identified a few disproportionate impacts on individuals relating to pregnancy, maternity, paternity, adoption, menopause, or (in)fertility across the gender spectrum. The policy is applied in a manner that is consistent with the licensing objectives and equality legislation. Where relevant, the council remains committed to monitoring and responding to any emerging issues through consultation and engagement with affected groups.

Positive impacts:

- Safer night-time economy benefits pregnant women and new parents.
- Public health approach addresses alcohol harm.
- Environmental considerations could support cleaner, healthier environments.

Potential negative impact: policy still lacks specific consideration of pregnancy/maternity needs such as baby-changing facilities and breastfeeding. Family-friendly venue support is also limited

Potential mitigations:

- Include family-friendly provisions in Best Practice Measures
- Encourage baby-changing facilities in larger venues
- Support breastfeeding-friendly licensing conditions
- Consider family-friendly hours in venue mix
- Ensure dispersal policies consider parents with young children

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?

YES/ NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census 2021 -

5,600 residents stated on the 2021 Census that they had previously served in the armed forces (2.4% of those aged 16+, England 3.8%).

Our analysis indicates that the SoLP can have a disproportionate impact on Armed Forces Members or Veterans. The policy is designed to be inclusive and applied consistently across all groups. The Council remains committed to supporting the Armed Forces community and will continue to monitor for any potential impacts through ongoing engagement and review.

Positive impacts:

- General public safety and crime reduction measures benefit all residents including armed forces community
- PTSD support services may be accessed through partnership approaches

Potential negative impact:

- No recognition of Armed Forces Covenant or specific needs of armed forces community.
- Veterans with PTSD or mental health conditions may be vulnerable in night-time economy.
- No specific consideration in vulnerability training
- Military ID may not be recognized as valid proof of age

Possible mitigations:

- Reference Armed Forces Covenant in policy
- Include military ID in acceptable proof of age documentation
- Vulnerability training should cover PTSD and military-related mental health
- Staff training on recognizing and supporting veterans in crisis

From the Health Counts 2024 Survey: 1.5% previously served in the regular UK Armed Forces, 0.6% reserve Similar to the 2021 Census at 1.7% (regular) and 0.6% (reserve)

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES / NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

[From the Health Counts 2024 Survey:](#) 0.4% are a refugee and 0.2% are an asylum seeker No comparative data available

The policy and determination of applications must have due regard to the PSED. Each case must be considered on its-merits.

Positive impacts in the Draft SoLP:

- Section 10.1.1 mentions religious and faith groups in equality commitments.
- Crime prevention targets religiously motivated crimes (11.2)
- Diversity of premises approach (3.4.1) could support venues catering to different faiths
- Non-alcohol-led venues explicitly valued (3.4.4c)

Potential negative impacts:

- Alcohol-focused policy may not reflect needs of abstaining communities
- Consultation list (1.4.1) doesn't explicitly include faith organizations

Potential mitigations:

- Increase engagement with faith organizations in future monitoring and consultation
- Support non-alcohol venues and alcohol-free events
- Staff training on religious/cultural sensitivity (add to 1.9.2 framework)
- Recognize religious festivals and considerations in licensing

Licensed premises might provide job opportunities for migrants, asylum seekers, and refugees who may face barriers in other sectors. Also consider risks of exploitation (including economic) due to vulnerable immigration status or language barriers and potential issues re: legal status and work rights. Language and cultural barriers. Potential risk of risk of trafficking or coerced participation for some individuals.

Should a member of staff, management or a customer have a safeguarding concern regarding potential trafficking or coerced involvement in the industry, there should be an awareness of where to report information. Premises can have a Diversity, Equity and Inclusion (DEI) Policy.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES / NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census 2021 -

1 in 12 residents (20,800 people, 7.8%) provide un-paid care (9%).

From the Health Counts 2024 Survey: 16% provide some unpaid care Higher than the 2021 Census at 8%

The review of the SoLP has not identified any disproportionate impact on Carers. While this group may face barriers linked to age, ethnicity, language, or other intersecting factors, the policy is applied consistently and does not directly affect access to services or opportunities for Carers. The Council remains committed to inclusive engagement and will continue to monitor and respond to any emerging concerns through consultation and review processes.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES / NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Census 2021 -

At the end of March 2022, there were 382 children aged 0-17, 82 per 10,000, living in care in Brighton & Hove (England 70 per 10,000)

From the Health Counts 2024 Survey: 4% have ever lived in care as a child or young person
This is the first time that this question has been asked. No comparative figure available

The review of the SoLP has not identified any disproportionate impact on looked after children, care leavers, or individuals with care or fostering experience. However, in line with the Council's Corporate Parenting Responsibility, we recognise the importance of safeguarding and promoting the wellbeing of these individuals. The licensing objective of protecting children from harm supports this commitment, and the Council will continue to monitor and engage with relevant stakeholders to ensure inclusive and supportive policy outcomes.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk

YES / NO

and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

[From the Health Counts 2024 Survey](#): 0.9% live in temporary or emergency accommodation. This is the first time these results are able to be presented in Health Counts

The city's homeless population in June 2024 was 3,580 people or 1.3% of the city's population. Most of these were living in temporary accommodation. This figure is from [the 'Review of homelessness in Brighton & Hove 2025'](#)

The review of the SoLP does not indicate a disproportionate impact on people experiencing homelessness. However, in line with a ['Review of homelessness in Brighton & Hove 2025'](#), the Council recognises that homelessness disproportionately affects vulnerable groups and intersects with factors such as age, ethnicity, disability, and veteran status. The licensing objectives—particularly public safety and the protection of children from harm—support the council's commitment to safeguarding and inclusive practice.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

YES/ NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The policy must have due regard to the PSED. Each application must be considered on its merits.

The review of the Statement of Licensing Policy under the Licensing Act 2003 has not identified any disproportionate impact on survivors of domestic abuse or individuals in vulnerable situations. However, the Council recognises its duty to safeguard and support vulnerable groups, and acknowledges that intersectional factors such as age, ethnicity, language, and socio-economic status may influence experiences of harm. The licensing objective of protecting children from harm, alongside public safety, supports this commitment. The Council will continue to apply its [Corporate Parenting Responsibility](#) and work with partners to ensure the policy remains inclusive, trauma-informed, and responsive to emerging needs.

The [draft SoLP](#), states the following: The Licensing Authority expect licensed premises to develop staff policy and training on recognising signs of drunkenness, spiking and vulnerability, for example, offering drinking water and tips for refusing customers who appear drunk. And discourage company policies that promote bonuses and sales incentives for selling alcohol. Licensing Authority will expect necessary precautionary processes to restrict drunkenness.

It further goes on to outline Safeguarding Initiatives under Section 4:-

Violence Against Women and Girls (VAWG).

The Community Safety Partnership also oversees the Violence Against Women and Girls (VAWG) Strategy as part of their remit. They can be contacted at VAWG.Unit@brighton-hove.gov.uk for information and training on VAWG related issues.

Brighton and Hove supports the White Ribbon campaign and the Licensing Authority would encourage all licensed premises to promote the 'White Ribbon Promise' to never commit, excuse or remain silent about violence against women and girls. Training and support is available to support premises to take action, further information regarding training can be obtained from VAWG.unit@brighton-hove.gov.uk. Accreditation is still in progress for BHCC.

Vulnerability Training

Additional training in safety measures and vulnerability for the night time economy.

Training has previously been delivered by Sussex Police in conjunction with the Brighton Crime Reduction Partnership (BCRP) to staff working within the night-time economy to provide them with knowledge of vulnerability and ensure they understand their responsibilities and duty of care to vulnerable people including actions that must be taken to reduce identified risk.

Training carried out or provided to venues should include:

- **Vulnerability Identifiers and Initiatives** - These include what to look for and how to identify if a person is vulnerable or has become vulnerable throughout an evening. It may include schemes such as 'Ask for Angela' which is an initiative for persons that are feeling uneasy in a night time economy venue and need a safe way of leaving.

The individual can approach a member of bar staff and ask for Angela and the staff will know this person needs some help getting out of a situation they don't feel safe or comfortable in. This could be calling them a taxi or a friend or family member to come and collect them.

- **Drink Spiking** - The BCRP have facilitated a number of training sessions for bar staff and management around how to respond to a spiking incident. This remains an ongoing concern in the night time economy and venue staff/night time economy workers should be encouraged to engage in continual learning around this.
- High risk venues will need to have a clear and actionable policy in place to prevent and respond to drink spiking. This includes staff training, procedures for reporting incidents, and support for victims.
- The Home Office Spiking Team also offer free training to people working in the nighttime economy. Further details can be found via the following link: [Spiking Awareness Training Tickets, Multiple Dates | Eventbrite](#)
- **Safety-First Door Policy:** Venues will no longer be allowed to eject vulnerable individuals, especially lone adults, without care. Whether someone is intoxicated, separated from their group, or simply in need of help, venues must act responsibly.

Premises should make themselves aware of the: Night Time Industry Association (NTIA) standards of good practice for dealing with spiking and having a duty of care for customers as well as integrate with other safety related initiatives in the city. [Guidance & Best Practice - NTIA](#)

Partner Agency Initiatives

Safe Space

Safe Space, run by Change Grow Live (CGL), runs throughout the year on Fridays and Saturdays (23.30-04.00Hrs) from its base in St Pauls Church, West Street. The project provides a safe place for users of the night time economy who are rendered more vulnerable due to alcohol and/or drug use, or through physical injury or emotional distress. Safe Space regularly provides emotional support to distressed people, including delivering suicide prevention interventions and safety planning (through the ASIST model). First Aid is provided with emotional and practical support from the CGL team. subject to funding, CGL may also deploy a mobile outreach team along the seafront, providing an immediate response to vulnerable individuals and, where safe to do so, transporting them to St Paul's Church. Mobile teams also operate on New Year's Eve in the Kemp Town and East Street areas. The Safe Space initiative also contributes positively to reducing the need for police and medical intervention.

Further safety and partner agency initiatives can be found in our [draft SoLP](#) from 4.3.2 such as; Beach Patrol, Street Pastors, the Nightlife Safety Advocates (NSA) scheme, Operation Marble, Night Safety Marshals and the Brighton Crime Reduction Partnership (BCRP).

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The review of the SoLP has not identified any disproportionate impact on individuals experiencing socio-economic disadvantage. While these groups may face broader systemic barriers, the policy is applied consistently and does not directly restrict access or participation. The Council remains mindful of intersectional inequalities and is committed to inclusive engagement, ensuring that licensing decisions support public safety and community wellbeing without exacerbating disadvantage.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?

YES/ NO

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The review of the SoLP does not indicate any disproportionate impact on Human Rights. The policy is designed to uphold the principles of fairness, transparency, and equality, and is applied consistently in line with the Human Rights Act 1998. The licensing objectives—particularly public safety, prevention of public nuisance and the protection of children from harm—support the Council's commitment to safeguarding individual rights. The Council will continue to ensure that licensing decisions respect and promote human rights across all communities and supports fairness and transparency. Key articles potentially engaged include Article 6 (right to a fair hearing), Article 8 (the right to respect for private and family life), Article 10 (freedom of expression), and Article 1 of Protocol 1 (protection of property).

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

The Licensing Policy could have complex impacts on several intersecting groups:

- Young adults from low-income backgrounds who frequent licensed premises
- Older residents living near venues who may have mobility or health concerns
- People with certain disabilities who may require specific accommodations to access licensed venues
- People experiencing homelessness who may gather near premises selling alcohol
- Residents in more deprived areas where there may be higher concentrations of licensed premises
- Families with children living in proximity to licensed venues
- Religious communities whose beliefs may conflict with alcohol consumption or certain entertainment

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1) Develop an equality-focused consultation approach to gather specific data on licensing impacts.

- We will have targeted consultation questions addressing potential equality impacts as part of any SoLP consultations.
- We will include more detailed questions targeting protected characteristic and additional groups that we have identified as gaps in engagement (Armed Forces, carers, migrants, the homeless etc.)

This will happen when we next consult of any changes to the 2026 SoLP in coming years, there is no current timeline for this although as a minimum, the Licensing Act 2003 states that SoLPs must be reviewed at least every five years, however it is likely it will be reviewed before this to assess the latest review.

2) We will ensure consultation materials are accessible in multiple formats and languages as needed - having checked with our Digital Engagement and Insight Officer Your Voice fully complies with Web Content Accessibility Guidelines (WCAG) 2.2

This is all in the [Your Voice guide](#)

3) Review policy wording to ensure it supports equality considerations

4) Include specific sections on accessibility requirements for licensed premises

5) Add guidance on preventing discrimination in licensed venues

6) Incorporate safeguarding measures for vulnerable groups

7) Consider the needs of different communities in relation to licensed activities.

This will be reviewed on completion and publication of the final 2026 SoLP due to be published in January 2026.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

The identified actions will be transferred to:

- Licensing Service Plan
- The council's Fair and Inclusive Action Plan (FIAP)

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	X
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

The initial assessment suggests the Statement of Licensing Policy Review 2026 can proceed with specific attention to gathering more comprehensive equality data through the future consultation process. While no immediate disproportionate impacts have been identified, the licensing team will implement targeted consultation methods to ensure diverse voices are heard and ensure that any potential equality issues are addressed in the final policy. The licensing objectives already include "protection of children from harm," which is a positive equality consideration. The policy review will incorporate specific considerations around accessibility, community safety for vulnerable groups, and preventing discrimination in licensed premises.

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

This EIA will be published alongside consultation materials for the Statement of Licensing Policy Review 2026 and with committee papers when the policy is presented for approval.

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Sarah Cornell, Senior Licensing Officer and Emily Fountain, Licensing Officer	23.10.25
Accountable Manager:	Alex Evans, Licensing Team Leader	23.10.25

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and HEad of Service level approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Zofia Danin	23-Oct-25
EDI Manager:	Deborah Totney	24 October 2025

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment: