

Licensing Panel (Licensing Act 2003 Functions)

Date: **18 August 2025**
Time: **10.00am**
Venue **Virtual**
Members: **Councillors:** Cattell, Hewitt and Thomson

Contact: **Francis Mitchell**
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AGENDA

1 TO APPOINT A CHAIR FOR THE MEETING

WELCOME & INTRODUCTIONS

2 PROCEDURAL BUSINESS

(a) **Declaration of Substitutes:** Where Councillors are unable to attend a meeting, a substitute Member from the Licensing Committee 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.

3 STATION GRILL LICENSING PANEL (LICENSING ACT 2003 FUNCTION)

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Contact Officer: Charles Boufrahi
Ward Affected: West Hill & North Laine

Date of Publication – Monday 11 August 2025

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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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Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:	Application for a New Premises Licence under the Licensing Act 2003
Premises:	Station Grill, 62 Queens Road, Brighton, BN1 3XD
Applicant:	London Export and Import Ltd
Date of Meeting:	18 August 2025
Report of:	Corporate Director for City Operations
Contact Officer: Name:	Alex Evans
Email:	Alex.evans@brighton-hove.gov.uk
Ward(s) affected:	West Hill & North Laine

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To determine an application for a New Premises Licence under the Licensing Act 2003 for Station Grill.

2. RECOMMENDATIONS:

- 2.1 That the Panel determine an application for a New Premises Licence under the Licensing Act 2003 for Station Grill.

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a New Premises Licence under the Licensing Act 2003. The application proposes ***“RESTAURANT LOCATED AT 62 QUEENS ROAD, BRIGHTON”***

- 3.2 Section 18 (Operating Schedule) of the application is detailed at Appendix A. Additional supporting information submitted by the applicant can be found in Appendix A1 and the plan of the premises is attached at Appendix B

- 3.3 Summary table of proposed activities

	Proposed
Late Night Refreshment	Every Day: 23:00 – 05:00
Hours premises are open to public	Every Day: 05:00 – 04:59

- 3.4 Cumulative Impact. The premises falls within the Cumulative Impact Area (“The Area”) (see paragraphs 3.1 – 3.1.10).

Representations received

- 3.5** Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.6** 2 representations opposing were received from Sussex Police and The Licensing Authority. 41 supporting representations were received from residents.
- 3.7** Representations received related to the licensing objectives of Prevention of Crime and Disorder, Prevention of Public Nuisance, Public Safety, Protection of Children from Harm and Cumulative Impact.
- 3.8** Full details of the representations from the Licensing Authority and Sussex Police (together with proposed conditions from Sussex Police if the licence is granted) are attached at Appendix C. The supporting representations are attached at Appendix D. A map detailing the location of the premises is attached at Appendix E.

4. COMMENTARY ON THE LICENSING POLICY

- 4.1** The following extracts from Brighton & Hove City Council Statement of Licensing Policy are considered relevant to this application and **are numbered as they appear in the 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 4th February 2021. 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; and
- (d) the protection of children from harm.

1.3 Scope

1.3.1 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

3 Special Policies and Initiatives

3.1 Cumulative impact

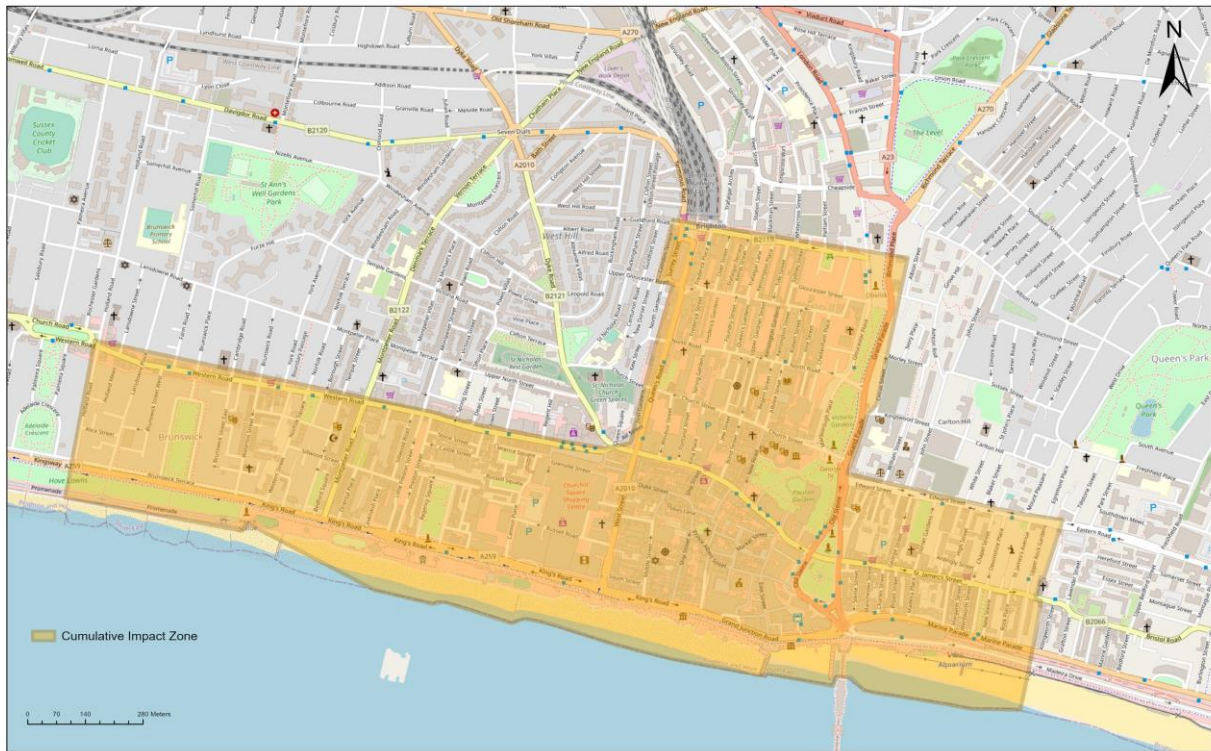
3.1.1 The licensing authority may receive representations from either a responsible authority or other persons that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives. This should not, however, be confused with 'need' which relates more to the commercial demand for a particular type of premises. The issue of 'need' is therefore a matter for the market to decide and can, in some circumstances, be a matter for planning consideration; need therefore, does not form part of this licensing policy statement.

3.1.2 **Special Policy** - Cumulative Impact is defined as the potential impact upon the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.

3.1.3 The licensing authority, after careful consideration, has determined that the concentration of licensed premises in an area of the city centre is causing problems of crime and disorder and public nuisance, and that therefore an approach to 'Cumulative Impact' is necessary as part of its statement of licensing policy. The first Special Policy incorporating a Cumulative Impact Zone (CIZ) and Special Stress Areas (SSA's) was adopted in March 2008. Since that date, the licensing authority has kept the CIZ and SSA's under review. On 15 December 2011 Full Council resolved to expand the CIZ and the special stress area, covering 1.5% of the administrative area of Brighton & Hove City Council. On 20th November 2014 Licensing Committee resolved to confirm the current CIZ and SSA as defined in the current Statement of Licensing Policy. On the 29th November 2018 Licensing Committee resolved to expand the SSA into Central Hove. It is now proposed to expand the SSA into Preston Road and Beaconsfield Road. The licensing authority has published a Cumulative Impact Assessment which can be found at Appendix E.

3.1.4 This special policy will refer to a Cumulative Impact Zone (“the CIZ”) in the Brighton city centre, a detailed plan of which is shown below.

Cumulative Impact Zone, January 2021



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3.1.5 The Cumulative Impact Zone comprises the area bounded by and including: the north 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 west side 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.

3.1.6 The special policy will only be overridden in exceptional circumstances. The effect of this special policy is that applications for new premises licences or club premises certificates within the area, or variations which are likely to add to the existing Cumulative Impact will be refused following relevant representations. This presumption can be rebutted by the applicant if they can show that their application will have no negative Cumulative Impact.

3.1.7 This special policy also applies to all new premises licences and club premises certificates, for example pubs, restaurants and take-away establishments. Off licences also come within this policy as they can contribute to problems of street

drinking, proxy purchasing, dispersal issues, preloading and excessive drinking and related disorder.

3.1.8 The presumption of refusal does not relieve responsible authorities or other persons of the need to make a relevant representation. If there are no representations, the licensing authority must grant the application in terms consistent with the operating schedule submitted.

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well-qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.

3.1.10 If the licensing authority decides that an application should be refused, it will still need to show that the grant of the application would undermine the promotion of one of the licensing objectives and that conditions would be ineffective in preventing the problems involved.

3.3 The Matrix Approach

The Licensing Authority will support:

3.3.1 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.

3.3.2 A "matrix" approach to licensing decisions has been adopted and is set out below. It provides a 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 investor and businesses making applications.

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

	Cumulative Impact Area	Special Stress Area	Other Areas
Restaurant	Yes (midnight)	Yes (midnight)	Yes (midnight)
Café	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
Late Night Takeaways	No	Yes (midnight)	Yes (midnight)
Night Club	No	No	No
Pub	No	Yes (11pm)	Yes (midnight)
Non-alcohol lead (e.g. Theatre)	Yes (favourable)	Yes (favourable)	Yes (favourable)
Off-licence	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
Members Club (club premises certificate)	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

Notes on matrix

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

- 1) Each application will be considered on individual merit
- 2) Applications within the CIZ are subject to the special policy on cumulative impact at para 3.1, and those within the special stress area to the special stress policy considerations at para 3.2.
- 3) Departure from the matrix policy is expected only in exceptional circumstances
- 4) Exceptional circumstances will not include quality of management or size of venue except where explicitly stated in policy matrix.
- 5) Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).
- 6) The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre.

7) Other Areas; consideration will be given to the nature of the area and location in relation to any application. In a residential area for example the concerns of local residents will be relevant when considering applications for off-licences, pubs or cafes, especially if there is evidence of anti-social behaviour, street drinking or underage drinking. Earlier closing times may be appropriate. Regard will be had to the Public Health Framework for assessing alcohol licensing on our website.

8) In an area where there are already several existing off-licences or where the premises is situated within a parade with another off licence and where representations are received about negative cumulative impact on the licensing objectives of a further premises, the application may be refused on these grounds or restrictions placed on the terminal hour to reflect opening hours of other shops.

9) Outdoor events will be supported where arranged through the council's event planning process. 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.

10) Non-alcohol led category does not include "alcohol in shared workplaces". It is recommended that sale of alcohol in shared workspaces should have a terminal hour of no later than 10pm. For further advice and guidance on "alcohol in shared workplaces" please see paragraph 3.3.4-3.3.6.

4 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.

4.1.1 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 programmes which will raise their awareness of the issues relating to 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 programmes to help identify children at risk and issues of basic child protection. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence.

4.1.2 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.

4.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.

4.1.4 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.

4.2 Sussex Police

4.2.1 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. There continues to be an increasing demand for resources further into the early hours of the morning with the highest concentration of crimes occurring between 21:00 and 06:00 on a Friday into a Saturday and between 20:00 and 06:00 on a Saturday night into a Sunday. The data set used shows that up to 80% of arrests made in the timeframe 20:00 – 06:00 on these days were affected by alcohol. For full details of these statistics see the Cumulative Impact Assessment at Appendix E.

4.2.2 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.pnn.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.

4.2.3 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 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.

4.2.4 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 to tackle the problem of those who use false or another's identification to enter licensed premises and purchase alcohol.

4.2.5 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. Sussex Police also support initiatives such as (but not limited to) safe spaces, mobile teams of volunteers actively checking people's well-being and the Beach Patrol.

4.2.6 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.

4.2.7 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 the council's Special Policy which defines cumulative impact and special stress and 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.

4.3 Care, control and supervision of premises

4.3.1 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 good 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.

4.3.2 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.

4.3.3 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.

4.3.4 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.

4.3.5 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.

4.3.6 Enforcement will be achieved by the enforcement policy appended (Appendix B).

5 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.

5.1.1 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.

5.1.2 Normally in the city centre, pubs and clubs will be expected to operate using polycarbonate or toughened/shatterproof glass.

5.1.3 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 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.

5.1.4 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

6 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:

6.1.1 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 (eg in order to smoke).

6.1.2 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.

6.1.3 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.

6.1.4 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.

6.1.5 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.

6.1.6 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 6.2 below).

6.2 Smoking Advice

6.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on your 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 Heath 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 you may find it 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.

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

7 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, eg 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).

7.1.1 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 police, trading standards officers and their partners in the Licensing Strategy Group (eg passport, photo driving licence or pass card).

7.1.2 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 7.1.4 below.

7.1.3 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

7.1.4 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.

7.1.5 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, or in specific cases where such certificates have not been granted, the licensing authority. The licensing authority does not intend to adopt its own system of film classification. The licensing authority's procedures for dealing with unclassified films are appended at Appendix C.

7.1.6 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.brightonandhovelscb.org.uk/wp-content/uploads/What-to-do-if-a-child-isbeing-abused.pdf

Probably also worth getting him to put in that 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.

7.1.7 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.

7.1.8 Trading standards have a programme of business support including training for local businesses to avoid under-age sales.

8 Integration of Strategies

8.1.1 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 the Sussex Police, Community Safety Forum, Sustainability Commission representatives and following the guidance in community safety and crime and disorder strategy
- Liaising and consulting with Public and Alcohol Programme Board
- Liaising and consulting with the East Sussex Fire & Rescue Service
- Liaising and consulting with the Local Strategic Partnership, Safety Advisory Group (Emergency Planning) and Equalities and Social Justice Consultation Forum
- 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

8.1.2 In line with statutory requirements and the council's Inclusion Policy, 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, for example communities of interest such as: lesbian, gay, bisexual and transgender people; disabled people; racial and ethnic groups; religious and faith groups.

8.1.3 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.

8.1.4 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.

8.1.5 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.

8.1.6 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.

8.3 Enforcement

8.3.1 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.

8.3.2 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 taken into account 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

APPENDIX A – Licensing Best Practice Measures

Best Practice Measures to be included for consideration, in particular in SSA:
Matters that would normally be expected in operating schedules:

- the adoption of a policy (e.g. Challenge 25) with acceptable proof of ID as per existing Statement of Licensing Policy
- all off sales to be made in sealed containers for consumption away from the premises
- a smoking policy which includes an assessment of noise and litter created by premises users
- the use of plastic or 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
- use of a 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
- policies for dispersal of customers which may include signage regarding taxi services' telephone numbers and advice to respect neighbours and minimize noise

Items to which positive consideration would be given:

- membership of Business Crime Reduction Partnership, Pubwatch, Neighbourhood Watch or similar schemes

- use of 'Night Safe' 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

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 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
- Signage – proxy sale – deterrence

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 5.1 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 at a level to allow licensing authorities to fully recover the costs of administration, inspection and enforcement of the regime.

Finance Officer Consulted David Wilder

Date: dd/08/2025

Legal Implications:

- 5.2 The licensing authority must act to promote the four licensing objectives which are:

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

The licensing authority must have regard to its statement of licensing policy and the guidance issued by the Secretary of State in carrying out its functions.

Lawyer Consulted: Rebecca Sidell
07/08/25

Date:

Equalities Implications:

- 5.3 Diversity is valued and strong, safe communities are vital to future prosperity. Licensing policy aims to protect children from harm including sale and supply of alcohol to children.

Sustainability Implications:

- 5.4 Licensing policy aims to prevent public nuisance and develop culture of live music, dancing and theatre.

SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A – Section 18 (Operating Schedule) of the Application
2. Appendix A1 – Additional supporting information from the applicant.
3. Appendix B – Plan of Premises
4. Appendix C – Representations from the Licensing Authority and Sussex Police (together with proposed conditions from Sussex Police if the licence is granted)
5. Appendix D – Supporting Representations
6. Appendix E – Map of Area

Documents in Members' Rooms

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2021.

Home Office, Revised Guidance issued under section 182 of the Licensing Act 2003, February 2025.

Public Health Framework for Assessing Alcohol Licensing – January 2022.

Background Documents

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2021.

Appendix A

Section 18 of 21

LICENSING OBJECTIVES

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

List here steps you will take to promote all four licensing objectives together.

We are applying for a Late Night Refreshment Licence for a small restaurant located within the Cumulative Impact Zone (CIZ) in central Brighton. However, we believe this application will not add to the cumulative impact because:

1. A fully working and maintained CCTV system capable of recoding and storing images must be installed on the premises. The system must record at all times the premises are open to the public and images must be stored for a minimum of 31 days with date & time stamping. As a minimum this must cover all entry and exit points where sale/supply of hot food and drink takes place.
- 2- A person conversant with the retrieval and viewing of CCTV footage must be present on the premises at all times whilst they are open to the public.
- 3- Any downloaded CCTV footage requested by an officer representing a responsible authority will be made available within 24hrs of an incident occurring.
- 4- As I am a SIA Licensed door supervisor I will be (EXCLUSIVELY AS A DOOR SUPERVISOR WITH NO OTHER ROLES AT ALL) at the premises at all times the premises opens past midnight in all busy nights such as the pride, Christmas eve, football match nights or as per risk assessment outcome conducted in the premises. The door staff will be on duty from midnight until close. At any other times the use of any additional SIA licensed door supervisors that area required will be calculated via a risk assessment conducted by the General Manager. The risk assessment will be fully maintained and kept on the premises at all times. The Risk Assessment must be made available to an officer from a responsible authority upon reasonable request.
- 5- A CCTV system with Both audio and visual monitoring capability shall be installed and maintained in the premises. This system should be capable of being activated by either fixed or mobile panic buttons.
6. Signage stating that CCTV SYSTEM FOR antisocial behavior monitoring system is in place and operating at the premises" shall be displayed at the premises.
7. A direct telephone number for the manager at the premises shall be publicly available at all times the premises is open. This telephone number is to be made available to residents and businesses in the vicinity.
8. Membership of Business Crime Reduction Partnership, Pubwatch, Neighborhood Watch or similar schemes (exact Scheme to be confirmed).
9. A radio system accredited scheme will be adopted.
10. Signage stating that "anti-social behavior and/or disorder shall not be tolerated" shall be displayed at the premises.
11. All staff to be trained on induction and every 6 months, in relation to conflict management. This training to be recorded and provided to the Responsible Authorities upon request.
- 12- The Licensee will ensure that all times when the premises are for any licensable activity, there are sufficient competent staff on duty at the premises for the purpose of fulfilling the terms and conditions of the license and for preventing crime

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and disorder. The licensee will have a door supervisor (as explained above) on the premises who will ensure there is no crime or disorder. They will be well trained and disperse any sort of nuisance that may arise from groups. Staff will also be trained to ensure they will be able to deal with any sort of disruption which may affect neighbors as well as ensuring noise is kept to a minimum.

13- we will not sell ALCOHOL at all on or off the restaurant .

14- The business will be providing non-alcoholic late-night food, supporting safer late-night consumption and offering an alternative to alcohol-based venues.

15-Our comprehensive operating schedule promotes all four licensing objectives, with specific emphasis on crime prevention, public nuisance reduction, and customer safety.

16-The premises will not offer alcohol or entertainment, which reduces the risk of disorder and disruption.

17-Our robust CCTV system, staff training procedures, and active engagement with local authorities demonstrate our commitment to responsible management.

18-We will work with Sussex Police and local initiatives such as Business Crime Reduction Partnerships to stay proactive and accountable.

19- the seating area inside the restaurant will be closed for dine in after midnight and the restaurant will be only for food orders collection and delivery.

19-the business will stop serving customers dining in on the premises at midnight , and Signs on the doors would confirm that the business is closed to "walk-in" customers after 11:59 pm. the restaurant would offer deliveries (on electric bikes, electric vehicles, cars and mopeds) from midnight using either our own staff or a delivery service such as Deliveroo, Just Eat or Uber Eats for this purpose for deliveries. Asking delivery drivers to use designated loading bays which are immediately outside the restaurant, so they can park / waiting legally and properly and not causing a public nuisance by way of obstructing the highway or footpaths. as a result, the existence of a delivery service will withdraw customers away from the town centre, rather than into it. Also, will offer collection services for customers already EXISTING in the city centre and this does not interfere with the restaurant operations as these are standard restaurant operations as per class E(b) planning use. so we do not need a planning permission.

20-We fully understand and support the principles of the Brighton & Hove Statement of Licensing Policy 2021, and we are confident that our proposal contributes positively to the local area, providing a safe and well-managed environment for late-night refreshment.

so, we will :

1- Install and Maintain a Comprehensive CCTV System

2-Noise and Nuisance Control Measures

3-Work Closely with Local Authorities and Police

4-Staff Training and Incident Log

5-Appropriate Lighting and Clean Surroundings

6-SIA-Registered Door Staff.

I MUST ensure

that all times when the premises are for any licensable activity, there are sufficient competent staff on duty at the premises for the purpose of fulfilling the terms and conditions of the license and for preventing crime and disorder. I MUST ensure

that all staff will undertake training in their responsibilities in relation to the sale of hot food after 23:00 ,Records will be kept for training and refresher training.

21- Regarding Brighton and Hove, the Statement of Licensing Policy (SoLP), it outlines the circumstances under which a late-night refreshment license can be granted, even within a Cumulative Impact Zone (CIZ). Exceptional circumstances might include the following which we will do.

A- strong, enforceable measures to manage customer behaviour, such as limiting late-night customers to collection or delivery -only services, effective use of CCTV, no eat in services after midnight and having dedicated security personnel as required.

B- Strong Operational Management and Security Measures:

• Such as comprehensive staff training, strict controls on customer interaction after certain hours, and ensuring no loitering

Continued from previous page...

outside the premises.

22- The Council's Statement of Licensing Policy (SoLP) includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. , the Matrix table clearly shows that restaurants in the CIZ should be granted. AND The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (WHICH IS OUR CASE). Restaurants - the licensing authority may be prepared to look favourably upon an application for the grant of a licence to a restaurant.

23- "Our premises operates under Use Class E (b) – preparing meals for on-site consumption, while also offering a limited takeaway service. Under the new Class E regulations introduced in September 2020, this mixed use does not require separate planning permission."

• Example: In Westminster City Council v British Waterways Board (1985), the courts accepted that minor ancillary activities don't trigger change of use.

"Ancillary Use" Principle: As long as the takeaway is not a dominant part, it does not constitute a material change of use requiring permission.

24- THIS IS A PREMISES LICENSE APPLICATION SO, NO NEED FOR ANY PLANNING PERMISSION. AS WE OPERATE WITHIN CLASS E (b) USE.

25- WE ARE HAPPY TO CO-OPERATE WITH THE LICENSE AUTHORITY AND THE POLICE TO ADDRESS ANY CONCERNS OR CONDITIONS THAT THEY MAY WISH TO ADD.

26- we understand that in CIZ there were some crime and violence incidents , but all are related to alcohol consumption and nothing is related to our business or our shop. and the police can confirm that no crime is related to our shop at all.

27- Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.

28-The premises will operate as a restaurant until 23:59pm. From Midnight (00:00) until close the premises will be closed to customers (there will be only takeaways or delivery after that time). The premises door will be opened only to allow delivery persons to collect orders. Clear signage will be placed on the door to advising potential passing customers that the premises is closed for eat in.

29- All delivery orders shall be to a registered residential or business address. There shall be no deliveries to public/communal areas or open spaces.

30- PLEASE THIS IS A NEW APPLICATION AND IS NOT LINKED TO ANY PREVIOUS ONE , AS BY STATEMENT OF LICENSING POLICY , EVERY APPLICATION SHOULD BE TREATED ON IT INDIVIDUAL MERIT. SO, PLEASE DO NOT LINK IT TO ANY OTHER PREVIOUS APPLICATION AS ALL CIRCUMSTANCES HAVE CHANGED

31- NOW I HAVE EXPERIENCE FOR MORE THAN A YEAR IN LATE NIGHT REFRESHMENT KEBAB SHOP , IN MY SHOP AND IN LATE NIGHT ECONOMY.

32- I AM SIA LICENSED DOOR SUPERVISOR AND I WILL WORK EXCLUSIVELY AS DOOR SUPERVISOR AFTER MIDNIGHT IN BUSY NIGHT , AS PER RISK ASSESSMENT OUTCOME CONDUCTED IN THE SHOP , EVENTS NIGHTS , THE PRIDE AND SO ON. WITH NO INTENTION AT ALL TO DO ANY OTHER DUTIES IN THE SHOP WHILE WORKING AS A DOOR SUPERVISOR.

33- I understand how the policy

impacts on OUR application, AS MENTIONED ABOVE THE measures WE will take to mitigate the impact, and EXPLAINED why WE

consider the application should be an exception to the policy.

34- AS WE MENTIONED , WE ARE OPERATING AS A RESTAURANT, CLASS E(b), which is a restaurant , MOST OF OUR SALES (85-85 %) ARE EAT IN , AND CAN DO DELIVERY, TAKEAWAY AND COLLECTION (10-15% OF OUR TOTAL SALES)AS THESE ARE PART OF RESTAURANT OPERATIONS. WE OPERATE FROM 05:00 AM TIL MIDNIGHT(20 HOURS ROUGHLY) AS A RESTAURANT , AND FROM MIDNIGHT TO 04:59 AM (4 HOURS ROUGHLY FOR DELIVERY, COLLECTION AND TAKEAWAY), "Our premises operates under Use Class E b – preparing meals for on-site consumption, while also offering a limited takeaway service. Under the new Class E regulations introduced in September 2020, this mixed use does not require separate planning permission."

• Example: In Westminster City Council v British Waterways Board (1985), the courts accepted that minor ancillary activities don't trigger change of use.

"Ancillary Use" Principle: As long as the takeaway is not a dominant part, it does not constitute a material change of use requiring permission.

35- we kindly request that the LOCAL authority will have particular regard to the following relevant provisions of the

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European Convention on Human Rights: -

- Article 1 of the First Protocol that everyone is entitled to the peaceful enjoyment of his possessions (including for example possession of a licence).

36-Preventing Crime and Disorder:

- Strong Security Measures: the restaurant will install a comprehensive CCTV system covering all critical areas inside and outside the premises, which will be monitored throughout operating hours. This will deter potential criminal activities and provide evidence if any incidents occur. For example, similar establishments that implemented such systems in the CIZ have seen a significant reduction in incidents, which contributes to maintaining a safer environment. Although these incidents were related to alcohol consumption and sales and not related to late night food services.

- Well-Trained Staff: Our staff members will have training in conflict resolution, responsible service, and dealing with intoxicated individuals. This ensures that they can effectively manage any issues that might arise, thus preventing potential crime and disorder.

37-Preventing Public Nuisance:

- Focus on Delivery After either 02:00 am or 01:00 am or even Midnight as requested in the police proposed conditions: We emphasize that our operation after this specified hour by the local authority is primarily delivery-focused, with no eat-in customers accepted. Signage will be clearly displayed to inform potential customers of this, and only deliveries will be allowed. This reduces the risk of loitering, noise, and anti-social behaviour. Other businesses that have adopted this model have been able to maintain late-night operations without increasing public nuisance, as evidenced by their continued license renewals and no license reconsiderations have been made.

- Noise Control Measures: Delivery vehicles will be required to adhere to a "quiet zone" policy, ensuring that engines are turned off while waiting, and minimizing the use of horns or loud conversations. Staff will be instructed to be mindful of noise when handling deliveries.

38- Mitigating Potential Negative Cumulative Impact:

- o Operational Adjustments: we have adjusted our business model to better align with the council's SoLP. delivery model after midnight is specifically designed to prevent eat in, and ensure we do not contribute to public disorder or nuisance. Other establishments in similar cumulative impact zones have successfully implemented these changes, showing that such adjustments can be effective.

- o Commitment to Responsible Management: We are willing to accept conditions such as earlier closing hours for dine-in services at 01:00am or even midnight, limiting services to delivery only, and implementing strict controls on delivery operations. This flexibility demonstrates our commitment to responsible management and our willingness to work with the council to address any concerns.

39- 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 1 of the First Protocol that everyone is entitled to the peaceful enjoyment of his possessions (including for example possession of a licence).

40-To ensure that my business does not contribute to the challenges mentioned in the licensing policy, I plan to implement the following proactive measures:

- Installation of Security Cameras: High-definition CCTV cameras will be installed both inside and outside the premises to monitor activity and deter any potential disturbances. covering all key areas. The footage will be stored for a minimum of 31 days and made available to the police upon request.

- Enhanced Lighting: The exterior and entrance areas will be well-lit to create a secure environment for customers and passers-by.

- Trained Staff: All staff members will undergo training on conflict management and customer service to ensure they are equipped to handle potential issues calmly and effectively.

- Trained Staff and Security Personnel: All staff will be trained in conflict resolution. During peak hours (especially peak nights like the pride or Christmas eve), we will have licensed security door supervisor on site, and when needed or requested by the police as per their licence conditions to manage entry and monitor customer behaviour, ensuring swift intervention in case of any issues.

41-Zero Tolerance Policy on Anti-Social Behaviour: We will implement a strict policy to refuse service to individuals exhibiting signs of intoxication, aggression, or disorderly conduct. Our staff will be trained to handle such situations professionally and effectively.

- Close Liaison with Authorities: I am committed to maintaining a cooperative relationship with local law enforcement to promptly address any incidents should they arise.

42- Statistical Context and Low-Risk Profile

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Research and empirical data often illustrate that establishments focused solely on food service, as opposed to alcohol-centric venues, do not significantly contribute to crime and disorder. My business aims to provide a positive, community-focused service that aligns with the late-night dining needs of the city while operating under conditions that prioritize public safety.

43- THERE IS A HIGH DEMAND FOR OUR SERVICE, WE ARE THE ONLY RESTAURANT THAT PROVIDE HOT FRSH EGYPTIAN AND TURKISH FOOD IN THE CITY, SO WE ARE RESPONDING TO THIS VERY HIGH DEMAND , AND THE POLICE BEFORE CONFIRMED THAT WHILE THEY WERE WORKING IN A NIGHT SHIFT THEY CONFIRMED THAT THERE WAS A VERY HIGH DEMAND AND THEY EVEN COULD NOT WALK ON THE PAVEMENT WHILE THEY WERE VISITING ANOTHER SHOP NEXT DOOR , AND THEY COULD NOT ENTER THE SHOP NEXT DOOR DUE TO THIS HIGH DEMAND.

44-As we are struggling now financially, granting this license will not only assist in recovering from the financial challenges caused by reduced sales due to restricted hours but also strengthen our contribution to the local community. This includes providing food to those in need and fostering economic growth by creating future employment opportunities.

Moreover, the extended hours will enable us to cater to customers from nearby seafront attractions and Brighton train station, particularly during the holiday season and winter months when demand is typically higher. If the Council is unable to grant a license for both collection and delivery, we kindly request consideration for a late-night license for delivery services only after either 02:00 am or 01:00 am or even after Midnight.

45- WE ARE THE ONLY MIXED EGYPTIAN AND TURKISH CUSIN IN THE CITY AND THERE IS A HIGH DEMAND FOR OUR SERVICES ESPECIALLY FOR NIGHT SHIFT WORKERS , SECURITY STAFF , NHS STAFF , STUDENTS AND TAXI DRIVERS WHO NEED FRESH EGYPTIAN AND TURKISH HOT FOOD AFTER MIDNIGHT AND THERE IS NO EGYPTIAN CUSIN AT ALL OPERATING AFTER 11:00 PM IN THE CITY.

46- AS MENTIONED , WE ARE HAPPY TO CO-OPERATE WITH THE LICENCING AUTHORITY , POLICE AND THE LOCAL AOUTHORITY TO ADDRES ANY CONCERNS, OR IF THEY HAVE ANY SUGGESTIONS INCLUDING MITIGATING THE WORKING HOURS AFTER MIDNIGHT. OR SPECIFYING AN HOUR TO DO ONLY DELIVERY SERVICES LATE AT NIGHT. IF THE LOCAL AOUTHORITY IS UNABLE TO GRANT THE LICENSE TILL 05:00 AM , WE ARE HAPPY TO ACCEPT MITIGATING THE WORKING HOURS TO BE AGREED AND ALSO TO DO ONLY DELIVERY SERVICES AFTER WE AGREE FOR A SPECIFIC HOUR TO DO DELIVERY SERVICES ONLY AFTER THIS HOUR.

47- UNFORTUNATLY , BECAUSE WE ONLY BUY FOOD IN SPECIFIC WIGHT , SO DUE TO THESE RESTRICTED HOURS WE HAVE TO PUT THE FOOD IN THE WASTE AND BINS EVERY EVENING ALTHOUGH THERE ARE ALOT OF CUSTOMERS ASKING US TO SELL THE FOOD FOR THEM , BUT WE REFUSE AS IT IS 11:00 PM AND WE CAN NOT SELL THIS FOOD TO PUBLIC , WE HAVE TO PUT IT IN THE RUBBISH TO MAKE FRESH FOOD EVERY MORNING. THIS MAKES US STRUGGLE FINANCIALLY AS WE CN NOT SELL THIS FOOD AND WE HAVE TO PUT IT IN THE RUBBISH AND LOSING THIS MONEY EVERY DAY. UNFORTUNATLY SOMETHING LIKE DONNER KEBAB GYROSE FOR EXAMPLE IS COMING IN 15 KG, 20 KG AND 30 KG IN ONE SKEWER AND IT DEPENDS ON THE AVAILABLE WIGHT EVERY DAY. FOR EXAMPLE THE SUPPLIER MAY HAVE ONLY 30 KG DONNER KEBAB SKEWER AT THAT DAY. SO YOU HAVE TO CHOOSE EITHER NOT TO SELL THE WHOLE DAY DONNER KEBAB AND LOSE CUSTOMERS AND MONEY , OR BUY 30 KG DONNER KEBAB SKEWER WHICH AT THE EVENING WE HAVE TO PUT AT LEAST 20 KG IN THE RUBBISH AS THE FOOD HAS BEEN COOKED AND CAN NOT BE USED AGAIN. AND WE HAVE TO PUT FRESH ONE EVERY MORNING. THIS WASTING MONEY , EFFORT AND MAKE US LOSING CUSTOMERS EVERY DAY.

48- CAN YOU IMAGIN CUSTOMERS COME EVERY NIGHT SAW YOU PUT THE FOOD IN THE RUBBISH AND REFUSE TO SELL THEM THIS FOOD , THEY SAID ARE YOU CRAZY?? YOU REFUSE TO SELL US THE FOOD AND PUT IT IN THE RUBBISH???. MY REPLY IS : THIS IS BECAUSE WE ARE NOT ALLOWED TO SELL FOOD AFTER 11:00 PM TO FOLOW THE LAW.

49- THIS IS AGAINST HUMAN RIGHTS, AS EVERY ONE HAS THE RIGHT TO ENJOY HIS POSSESSIONS INCLUDING HAVINH A LICENSE.

b) The prevention of crime and disorder

See A above &

1- Install a comprehensive CCTV system covering all public areas, entrances, and exits. Footage will be stored for a minimum of 31 days, in line with Statement of Licensing Policy 2021 (Section 3.3).

2-Ensure staff are fully trained in conflict resolution, and refusing service to intoxicated individuals.

3-Collaborate with Sussex Police and join Business Crime Reduction Partnership (Policy Section 3.2).

4-Keep a refusals and incident logbook available for inspection.

5-An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. 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. The written risk assessment will be reviewed at least once every calendar year

6- Install a comprehensive CCTV system covering all customer areas, entrances, and the vicinity outside the premises. Footage will be stored for at least 31 days and made available to authorities upon request.

7-Employ trained staff to manage customer behavior and refuse service to intoxicated individuals or those displaying antisocial behavior.

8-Display clear signage about zero tolerance for drugs, weapons, and unruly conduct.

9-Any incidents of a criminal nature that may occur on the premises will be reported to the Police.

I MUST install comprehensive CCTV coverage at the premises and it is operated and maintained at the premises.

-----The CCTV system shall conform to the following points:

1. Cameras must be sited to observe the entrance and exit doors both inside and outside.

2. Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.

3. Cameras viewing till areas must capture frames not less than 50% of screen.

4. Cameras overlooking floor areas should be wide angled to give an overview of the premises.

5. Be capable of visually confirming the nature of the crime committed.

6. Provide a linked record of the date, time and place of any image.

7. Provide good quality images –colour during opening times.

8. Operate under existing light levels within and outside the premises.

9. Have the recording device located in a secure area or locked cabinet.

10. Have a monitor to review images and recorded picture quality.

11. Be regularly maintained to ensure continuous quality of image capture retention.

12. Have signage displayed in the customer area to advise that CCTV is in operation.

13. Police will have access to images at any reasonable time.

14. The equipment must have a suitable export method, e. G. CD/DVD writer so that the police can make an evidential copy of the data they require. This data should be in the native

Continued from previous page...

file format, to ensure that no image quality is lost when making the copy, if this format is non-standard (i.e. manufacturer proprietary) then the manufacturer should supply the replay software to ensure that the video on the CD can be replayed by the police on a standard computer. Copies must be made available to Police on request.

15- We will have a door supervisor on the premises to prevent any crime and disorder. We will also be observant and proactive, and keep an eye out for any potential issues before they escalate, such as monitoring the behavior of individuals entering the premises. We will also make it essential to communicate effectively with patrons to maintain a safe and respectful environment. If we notice any disturbances address them promptly and professionally to prevent further disruptions. Patrons will also be reminded to conduct themselves in an orderly manner and not in any way to cause annoyance to residents or persons passing by. Furthermore the premises will have CCTV which continually records capable of covering

both inside and outside the premises to enhance the safety of patrons and staff. We will also ensure all cameras are maintained and in good working orders well as keep footage for up to 31 days.

16- REGARDING OPENING HOURS, THIS IS A NEW APPLICATION AND NOW I HAVE THE REQUIRED QUALIFICATIONS TO WORK AS A DOOR SUPERVISOR AND THE REQUIRED EXPERIENCE IN LATE NIGHT ECONOMY.

17- Subject to GDPR guidance and legislation:

(a) 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 entrances/exits to the premises as well as any outside space. The system shall be on and recording at all times the premises licence is in operation.

(b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.

(c) CCTV footage will be stored for a minimum of 31 days

(d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.

(e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.

(f) 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 Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

(g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable - brighton.licensing@sussex.police.uk.

(h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by 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.

18. SIA licensed door supervisors shall be employed on any other occasions when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. The written risk assessment will take into account information or guidance offered by the police, and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.

19. 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 Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.

Continued from previous page...

20. The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.

21. (a) 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 a manager at least once a month.

(b) 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.

c) Public safety

1- Suitable measures will be put in place to prevent members of the public from accessing hot food in the kitchen and preparation areas

2- Ensuring public safety will be vital in our restaurant. To achieve this we will implement various measures. Firstly we will have well-trained staff who are aware of safety protocols and emergency procedures. Additionally we will maintain a clean and organized environment to prevent accidents. We will also have security cameras around and proper lighting to further enhance our safety measures. Appropriate fire safety procedures will be in place including fire extinguishers (foam, H2O and CO2), fire blanket, internally illuminated fire exit signs, numerous smoke detectors and emergency lighting. All emergency exits shall be kept free from obstruction at all times. Lastly, promoting a culture of respect and inclusivity among staff and customers can contribute to a safe environment

3-Comply fully with Health and Safety regulations, fire safety, and risk assessments to protect customers and staff.

4-Maintain a clear and safe layout inside the premises, including proper lighting and signage.

5-Limit customer numbers at night to avoid overcrowding (in line with Policy Section 3.5).

6-Provide first aid kits and ensure trained first-aiders are available during late hours.

7-Ensure proper fire safety measures fire extinguishers, and regular maintenance of fire alarms.

8-Maintain a well-lit interior and exterior to ensure customer safety and visibility, especially at night.

9-Conduct regular staff training on emergency procedures, including first aid and crowd management.

10-Appropriate fire safety procedures are in place including fire extinguishers (foam, H2O and CO2), fire blanket, internally illuminated fire exit signs, numerous smoke detectors and emergency lighting . All appliances are inspected annually.

11-All emergency exits shall be kept free from obstruction at all times.

d) The prevention of public nuisance

1-The management will ensure that delivery vehicles waiting or arriving to collect orders will be parked/waiting legally and not causing a public nuisance by way of obstructing the highway or footpaths.

2- Litter patrols to be conducted half hourly during hours of operation in the vicinity of the premises.

3-Notices shall be prominently displayed at all exits requesting patrons to respect the needs of local residents and businesses and leave the area quietly.

4. No fumes, steam or odours shall be omitted from the premises, so as to cause a public nuisance to any persons living or carrying on a business in the area where the business is situated.

5. No noise shall emanate from the premises not vibration be transmitted through the structure of the premises that give rises to a public nuisance.

6. Deliveries to the premises shall not take place between the hours of 2100 - 0600hrs daily.

Continued from previous page...

7. Recycling and rubbish should not be placed outside or collected from the premises between the hours of 2100 - 0600hrs daily.

8-A door supervisor will be at the premises preventing public nuisance. Staff will be observant and proactive and keep an eye out for any potential issues before they escalate, such as monitoring the behavior of individuals entering the premises. Any disturbances, will be addressed promptly and professionally prevent further disruptions.

The site will also not generate noise or vibration that excessively disturbs the people in the vicinity, Therefore after 11pm we will ensure noise is kept to a minimum and all exits will also have visible, clear and legible notices asking to respect the needs of local residents and to leave the site and area quietly.

The licensee will also ensure that staff shall arrive early morning or depart late at night when the business has ceased trading conduct themselves in such a manner to avoid causing disturbance to nearby residents.

9- Implement a Noise Management Plan: control of noise from kitchen equipment, customer activity, and deliveries—referencing Policy Section 3.6 on reducing nuisance.

10-Display "Please leave quietly" signs at exits to encourage respectful behaviour from customers leaving the premises.

11-Implement clear procedures for disposing of waste regularly and discreetly to prevent littering and odors.

12-Ensure customer dispersal is managed calmly to avoid loitering or disturbances outside the premises.

13-All customers will be asked to leave quietly.

14-Clear and legible notices and signs will be prominently displayed to remind customers to leave quietly and have regard to our neighbors.

15-ensure that delivery vehicles waiting or arriving to collect orders will be parked/waiting legally ON THE LOADING BAYS and not causing a public nuisance by way of obstructing the highway or footpaths.

e) The protection of children from harm

1-All staff will be trained in:

- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management.

we will have a policy in place assisting staff in how to deal with such situations.

All 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.

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.

Appendix A1

Statement of Exceptional Circumstances in Support of Late Night Refreshment Licence Application

Applicant: London Export and Import Ltd

STATION GRILL

Premises: 62 Queens Road, Brighton BN1 3XD

Business Type: Mixed Egyptian and Turkish Cuisine

This statement is to demonstrate *exceptional circumstances* for our Late Night Refreshment Licence application:

1. Consultation with and Meeting Requirements of Responsible Authorities

We are committed to working closely with responsible authorities, including Sussex Police, Environmental Health, and Licensing Officers. We have proactively consulted with these bodies to ensure our operation meets all public safety, nuisance prevention, and public order standards. Any specific concerns raised during the application process will be addressed swiftly and appropriately.

2. Corporate Social Responsibility (CSR) Policy

Our business upholds a clear Corporate Social Responsibility (CSR) approach. We aim to:

- Employ local residents, offering fair pay and safe working conditions.
- Implement robust waste management procedures to minimise litter and maintain street cleanliness.
- Provide staff training in responsible service and conflict resolution.
- Ensure the premises remain a safe and respectful environment for customers and neighbours.

3. Community Contribution to Offset Impact

We are willing to contribute to the local community in ways that mitigate the impact of late-night trading. This may include:

- Financial support or partnership with local schemes (e.g. street cleaning or CCTV).
- Keeping the immediate area clean and monitored by staff.
- Providing litter bins outside the shop and regularly cleaning the frontage.

4. Community Support

We have received positive feedback from local residents and businesses who see value in having a reliable, clean, and safe food outlet open late, especially for workers and visitors in the area. We are collecting letters of support, which can be made available upon request. Furthermore, we have received emails along with the local authority and the police supporting our application.

5. Alcohol Sales Ancillary to Primary Business Activity (NOT applicable)

While our main business of our restaurant is the preparation and sale of hot food, we have no intention at all to sell alcohol either now or in the future.

6- The following licensing activities are encouraged and valued by the licensing authority:

outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities (which **is our case as being a restaurant**), particularly within city centre.

Restaurants - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the agreed conditions.

Furthermore:

Prevention of Crime and Disorder

The data set used shows that up to 80% of arrests made in the timeframe 20:00 – 06:00 on these days were affected by alcohol and not hot food providers. For full details of these statistics see the Cumulative Impact Assessment at Appendix E.

7- we will be a member of:

Business Crime Reduction Partnership and other approved schemes, The BCRP NightSafe radio scheme, pub-watch schemes, and/or any accredited scheme.

8- I am SIA door supervisor:

The policy recognises the use of registered Door Supervisors All Door Supervisors will be licensed by the Security Industry Authority. We will use Mobile security units or similar systems which 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.

9- we will display prominent, legible signs at exits reminding customers to leave in a quiet, peaceful, orderly manner.

10- we will install a digital CCTV system by liaison with, and to a standard approved by, Sussex Police.

11- policies for dispersal of customers which may include signage regarding taxi services' telephone numbers and advice to respect neighbours and minimize noise.

12- we will be:

- A membership of Business Crime Reduction Partnership, Pubwatch, Neighbourhood Watch or similar schemes
- use of 'Night Safe' 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

- 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.

Conclusion

We respectfully request that our application be considered under these exceptional circumstances. We are confident that our approach demonstrates a strong commitment to responsible business operations, community engagement, and minimising any negative impact associated with late-night trading.

Yours sincerely

REDACTED

London Export and Import LTD
28/06/2025

Second statement of exceptional circumstances

Dear sir / madam,

Just to confirm that we believe our application should be considered as exceptional circumstances because of:

- 1- the operation of this premises **will not negatively add to the cumulative impact in the area** and that **exceptional circumstances do exist**.

2- Exceptional Circumstances Apply

SoLP states that:

- 3- *1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. **If an application is unlikely to add to the cumulative impact of the area, it may be granted.** The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, **a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.** And we are operating as a small restaurant, so we should be considered exceptional circumstances.*

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

- 5- *Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities (**WE ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND I WILL BE A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU**), an appropriate corporate social responsibility policy(**MY plan showing how my business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities and I mentioned all of that in my supporting documents which are attached and during the application process**),community contribution to offset impact (such as financial contribution to infrastructure)(**I will be offering something to compensate for any potential negative impact** such as **Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street).** community support (the licensing team and myself have received too many witness statements from the local residents, customers and neighbours to support **our application** and they **confirmed my premises is beneficial, our shop will help keep the area safer, They prefer regulated food options, our business provides a good community service as per their emails and letters**),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(**we will NOT***

sell alcohol at all and this should make our case **stronger** in the CIZ and be considered as exceptional circumstance)

*The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and **non-alcohol led licensable activities, particularly within city centre (which is our case a restaurant in the city centre).***

Our premises is:

- **Non-alcoholic**
- **Food-focused**
- **Small in size**
- **Willing to accept licence conditions**
- **Committed to hiring trained staff and implementing public safety measures**

I mentioned all of that in my submitted documents during this application process.

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application **meets the criteria for exceptional circumstances**. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, '*if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics*'. **And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.**

1. Support for a Non-Alcohol, Food-Only Operation

This premises is applying **only to provide hot food and soft drinks**, with **no alcohol**, no music, and no entertainment. Its business model is focused on **collection and delivery only after midnight**. This is clearly different in nature from most late-night venues in the area, many of which serve alcohol and contribute significantly to anti-social behaviour.

I believe that a **well-lit, monitored, food-only outlet** in this area is more likely to **reduce crime and disorder**

2. Public Safety and Night-Time Economy

As a local business owner, I have first-hand experience of the Queens Road area during late hours. The reality is that people will still be moving through this part of the city after midnight — either from the train station, bars, or workplaces —

regardless of whether food is available or not. Especially there is a late night refreshment premises REDACTED provides a different cuisine and they are open till 03:00 am. This make it unfair competition.

Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway REDACTED is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.

In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, REDACTED is allowed to operate until 3:00 am under similar circumstances.

Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

We believe it is resident's right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits their choices and compel them to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at REDACTED is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.

We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

By providing a controlled location where people can **safely pick up food**, we are in fact **supporting the safe dispersal of people**, not hindering it. Having a small, professional premises open with security measures is a better alternative than leaving the area with no regulated food options.

3. We have Taken Reasonable Steps

I understand the concerns raised by Sussex Police and Licensing, but I also have taken significant steps to comply:

- Offered to operate as **collection, takeaway and delivery only after midnight no eat-in service**.
- I am **SIA-licensed door supervisor**. I intended to be at the premises every night especially busy nights working exclusively as a door supervisor.
- Proposed to install **CCTV, external lighting, and digital order-only systems**.
- Committed to maintaining a clean, quiet, and professional premises.

Any uncertainties raised about experience or understanding should be weighed against the practical steps I am willing to take — and many of those could be resolved through clear licence conditions, co-operation and compliance checks, rather than outright refusal.

Regards

Station Grill

REDACTED

05/07/2025

Third statement of exceptional circumstances

Dear sir / madam,

Just to confirm with our previous statements that we believe our application should be considered as exceptional circumstances because of:

According to Statement of Licensing Policy in Brighton and Hove:

1. *'Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, **a small restaurant**, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well-qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.'*

And we confirm that our premises is a small restaurant and we will NOT sell alcohol at all.

2. Notes on matrix-

- 5) *Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).*

This is our **evidence to support Station Grill's premises licence application**, addressing and aligning with the policy's definition of **exceptional circumstances** under paragraph 5 of the Notes on Matrix from Brighton & Hove City Council's Statement of Licensing Policy:

These are our supporting evidence that Station Grill meets the criteria for exceptional circumstances as defined in paragraph 5 of the Brighton & Hove Statement of Licensing Policy.

1. Consultation with and Meeting Requirements of Responsible Authorities

- I am happy to co-operate with Sussex Police and the Council's Licensing Authority to discuss any concerns, and I sent them many emails asking them

to contact me if they have any concerns and require me to discuss it or if they want to mitigate any issues.

- Security measures have been incorporated into the operating schedule, including:
 - Installation of a full digital **CCTV system** covering entry, till, and customer areas.
 - Staff training on licensing laws, and conflict management.
- We are happy to discuss and agree to adopt all proposed conditions from responsible authorities to ensure full compliance with the four licensing objectives.

2. Corporate Social Responsibility (CSR) Policy

- Station Grill's CSR policy includes:
 - **Hiring locally** to provide employment opportunities to Brighton residents.
 - **Staff training programmes** focusing on food safety, health and hygiene, conflict management.
 - **Minimising waste** and reducing single-use plastics by switching to biodegradable packaging and compostable containers.
 - **Commitment to community safety**, including regular litter patrols.
 - **Inclusivity policy** ensuring a welcoming and safe space for all customers regardless of background or status.
 - ***Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities and I mentioned all of that in my supporting documents which are attached and during the application process.***

3. Community Contribution to Offset Impact

- The business has **invested in improving the shop** and external lighting, contributing to the vibrancy and safety of the surrounding area.
- I will be committed to working with local community safety officers and is open to a **voluntary financial contribution** or collaboration with community initiatives (e.g., waste collection or anti-litter campaigns).
- We are willing to engage in **voluntary participation in local business groups** or city council-led community safety partnerships.
- ***I will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, put outdoor bins, Contribute to a community safety scheme (like CCTV on the street)***

4. Community Support

- Over **30 written witness statements** have been received from nearby residents, local workers, and business owners, showing broad **community support** for Station Grill and its contribution to the neighbourhood.
- The statements confirm that the premises is not a source of antisocial behaviour and is seen as a positive, well-managed food establishment.
- Local support reflects trust in the business and recognition of its role in enhancing evening food options without encouraging late-night disturbance.
- *the licensing team and myself have received over 30 witness statements from the local residents, customers and neighbours to support **our application** and they **confirmed my premises is beneficial, our shop will help keep the area safer, They prefer regulated food options, our business provides a good community service as per their emails and letters.***

5. Alcohol Sale Ancillary to Business Activity

- Alcohol will **NOT** be sold **at all**
- We are prepared to accept **licence conditions in general.**
- The menu and pricing structure further emphasise the **food-led nature** of the business, **NO ALCOHOL SALE AT ALL.**
- *we will **NOT** sell alcohol at all and this should make our case **stronger** in the CIZ and be considered as exceptional circumstance)*

Conclusion

The evidence presented above demonstrates Station Grill's clear alignment with the Licensing Authority's definition of **exceptional circumstances**. The business does not pose a risk of adding to cumulative impact and is committed to operating responsibly, **with strong community support** and **full engagement with regulatory standards**.

We respectfully request the Licensing Committee to consider this evidence when determining our application.

Kind Regards

REDACTED

Station Grill

09/07/2025

SIA License Door Supervisor

Dear sir / Madam,

Just to let you know that, I have received my SIA License now. And I will be available to work and present in the restaurant as much as I can as a door supervisor exclusively in all busy nights at Station Grill. With no other duties at all during working at these nights as a door supervisor.

Please accept this as a confirmation that I am taking a serious and important steps towards this premises license to promote the 4 license objectives, and I am aware of all challenges that may be in CIZ including data about crimes may be existing in the area whether it is related to **ALCOHOL** or not, and to confirm that I understand fully the statement of license policy, have the required experience as being working in the late night kebab shop for over than a year and understand late night economy, and the challenges associated in the late night economy.

I think this was confirmed through my practical steps that I am taking and willing to take, plus over 30 witness statements that all of us received from the community and validated by the licensing team.

Please note that, **any uncertainties raised about experience or understanding should be weighed against the practical steps I am willing to take — and many of those could be resolved through clear licence conditions, co-operation and compliance checks, rather than outright refusal.**

Please find attached letter from SIA.

Regards

Message

This message is for information only. You cannot reply directly. If you would like to ask us a question about this message, please click on the [Help](#) tab at the top of the page and include any reference numbers or copy the message into your enquiry.

11 July 2025

Subject

Your SIA licence has been granted

Message

REDACTED

Licence Granted

We are pleased to inform you that your application for an SIA licence has been successful. The details of your new licence are:

Licence Number: REDACTED

Role: **Front Line**

Sector: **Door Supervision**

Licence Expiry Date: 10 July 2028

a key holder:

a manager, supervisor or employer of a licensed security operative in any licensable sector;

a director or partner of a company or partnership providing licensable services.

Your licence may also allow you to work in other front line roles. You can check this on our website at www.gov.uk/guidance/find-out-if-you-need-an-sia-licence#licences-that-cover-more-than-one-job-activity-integration

We have added your name and licence details to our public register of licence holders.

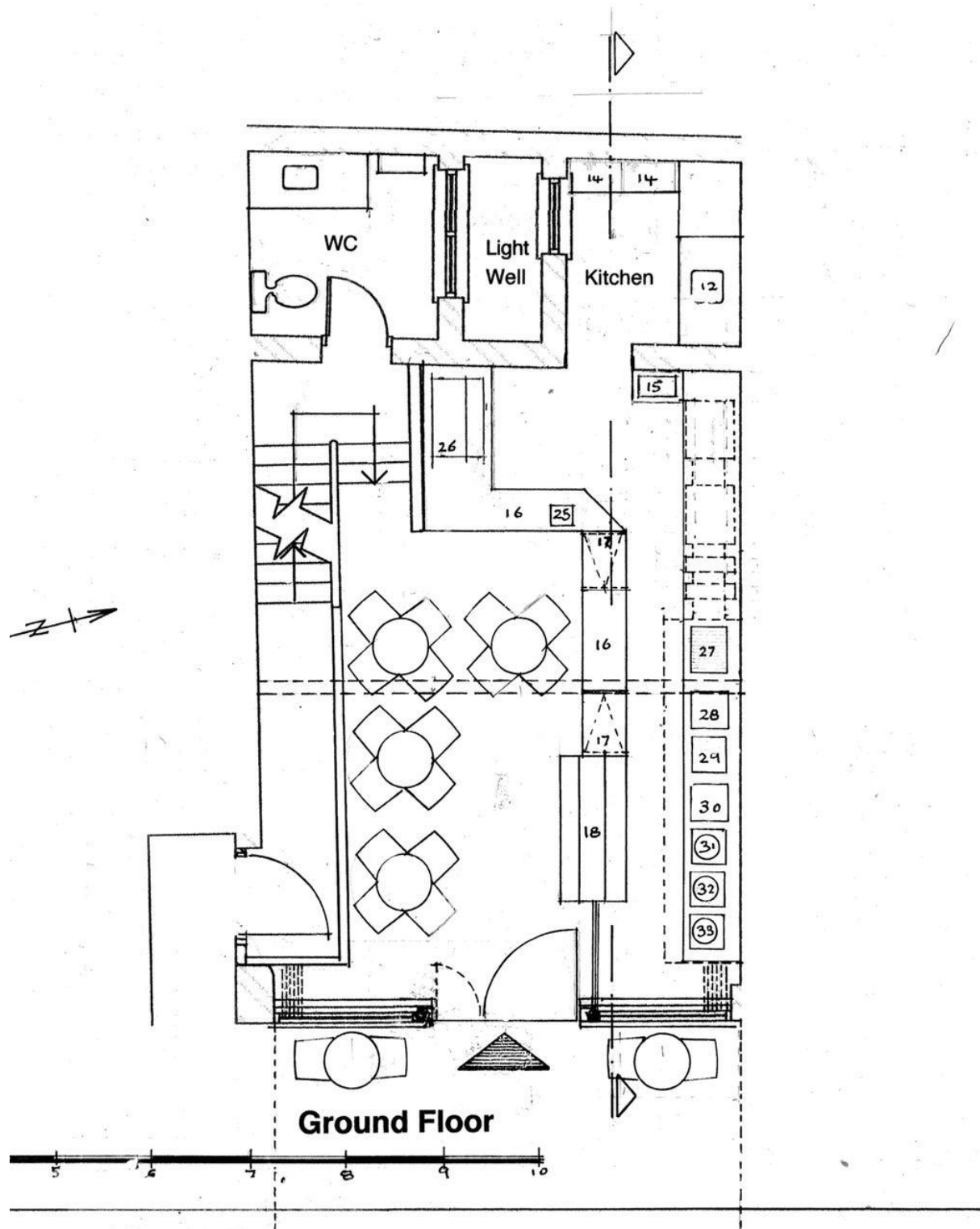
If your licence is a Key Holding licence, we will not send you a licence card. This letter is your proof that you are licensed, so please keep it safe.

For all other sectors, we will send your licence card to you shortly. It should arrive within 14 days. If it doesn't arrive within this time, you can request a replacement from the 'My licences' tab in your online account.

You do not need to wait for your licence card to arrive before you can start working. This is because you are legally licensed from the point at which we make our decision. Until your card arrives, please carry this letter and a form of photographic ID (e.g. a passport or driving licence) whilst working. If your employer has any concerns about this they can contact us through their online business account.

If your new licence is a renewal and your previous licence for the same role and sector is still valid, you can continue to use that licence card until it expires.

Appendix B



APPENDIX C

REP A

Police Station
John Street
Brighton
BN2 0LA

Email: brighton.licensing@sussex.police.uk

18th July 2025

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

SC CON END 25.07.2025 VALID PCD, PPN & CIZ (A)

Dear Sarah Cornell,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR STATION GRILL, 62 QUEENS ROAD, BRIGHTON, BN13XD UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed new licence application in an area of the City which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Cumulative Impact Area (CIZ) (as defined in the BHCC Statement of Licensing Policy) and seeks the following hours and licensable activities:

Late Night Refreshment (Both)

Every Day 23:00 – 05:00

Opening hours

Every Day: 23:00 – 05:00

Paragraph 3.1.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

“The licensing authority, after careful consideration, has determined that the concentration of licensed premises in an area of the city centre is causing problems of crime and disorder.”

In accordance with the Statement of licensing policy this application would be a “NO”

This premises lies within what was the Regency Ward which within the Brighton & Hove Public Health Framework for Assessing Alcohol Licensing and is ranked number 1 for All injury Violence, All violence against the person and Sexual Offences. Additionally, it’s ranked number 2 for Police recorded alcohol related incidents, demonstrating the higher risk to the Licensing Objective of the Prevention of Crime and Disorder in this area.

Recent incident & crime statistics indicate that during the period of 18th July 2024 and 18th July 2025 there were 297 crimes linked to Queens Road and surrounding side roads. The majority of these incidents were recorded as Violence against the person, anti-social behaviour and thefts.

This shows a slight increase in crimes from the previous searches which was run between October 2023 – October 2024 where there were 271 crimes recorded and May 2024 – May 2025 where there were 283 crimes linked to Queens Road.

There was also 11 Sexual Assaults reported along Queens Road in this 12-month period which again is an increase from the statistics provided between May 2024 and May 2025. To assist with the history, I have attached the two previous Sussex Police Representation letters to assist with evidencing the crime and disorder statistics in this area that has been recorded.

With the area already experiencing high number of incidents which occur throughout the day and night, permitting a premises to be open throughout the entire night time economy is likely to increase incidents in the locality, which is already a busy thoroughfare road to and from the city centre and the train station and is populated with many Licensed premises all varying from Pubs, off licences and Late Night Refreshment venues.

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering food and drink into the early hours encourages persons who may be under the influence of alcohol or drugs to remain in the area, which has a number of residential flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be problematic.

Sussex Police are aware that the applicant has previously submitted two applications for a premises licence at this address, both have been previously refused and Sussex Police are concerned how this application has been submitted so quickly, less than 24 hours following the last Panel decision.

The applicant has asked in the application for the 2 previous applications not to be linked, as all the circumstances have changed. However, Sussex Police are unsure of this as there was only 20 hours between the panel decision and this application being submitted.

A large number of emails have been received from the applicant with supporting evidence, these have been acknowledged as received by the Police Licensing team.

The applicant was advised in the second panel hearing to consider pre consulting with Sussex Police and advised to have a meeting with the licensing team to discuss concerns. The Applicant has not pre consulted with the police before this application was submitted.

In the application, the applicant states this premises is a restaurant. However, again the confusion remains that from Midnight the applicant has offered no dining in facility and from Midnight until 05:00 will be operating as a deliveries and collection services throughout the majority of the licensable hours.

If no dining facility is offered, Sussex Police believe this premises will be trading as a takeaway as all of the food ordered will be collected and eaten away from the premises, which is likely to see persons collecting and eating their food in public spaces again leading to congregation along Queens Road.

Sussex Police have little confidence in the applicant and fear should a licence be granted until 05:00 every day, which is now a later time again than previously applied for in the previous applications.

Sussex Police could see an increase in crime and disorder as the applicant would not be able to operate knowledgeably.

Sussex Police have noted that the applicant has asked for this application not to be linked to the previous applications in their operating schedule, however, point 43 in the operating schedule links to concerns raised by police over the congregation of persons along Queens Road in application 2, please see attached the Representation letter.

The point evidenced by the police in this letter, is the fact that this premises closes at 23:00 dispersed persons along Queens Road back up to the train station.

Sussex Police would also like to note that this premises is not the only premises who provide Egyptian and Turkish food, there are other premises across Brighton and Hove who offer Middle Eastern food and have late licences.

Although we are unable to support this application and are now seeking refusal for the third time, if the Licensing Panel are minded to grant this application at the hearing, Sussex Police have attached conditions and ask that these conditions are added to the Premises Licence, taking into account the request that the premises trades only for deliveries from Midnight until 2am. The conditions being offered unfortunately do not mitigate fully the risks should this premises trade until 05:00am. They go some way to reduce incidents occurring within the premises itself but there are no conditions that can address the risks once customers have departed. The risks of them becoming a victim of crime or them partaking in criminal activity is one that will need to be dealt with by the emergency services. Or if public nuisance issues occur, then this will be for the environmental officers to pick up.

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

- Attached proposed conditions.

Yours sincerely,

REDACTED

Insp Ben Morrison

Ops Planning and Events (inc. Licensing) Inspector

Brighton & Hove Division

Sussex Police

Police Licensing Representation Letter 19th May 2025

Police Station

John Street

Brighton

BN2 0LA

Email: brighton.licensing@sussex.police.uk

19th May 2025

The Licensing Technical Support Officers

Environmental Health, Brighton & Hove City Council

Bartholomew House, Bartholomew Square

Brighton, East Sussex

BN1 1JP

Dear Emily Fountain,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR STATION GRILL, 62 QUEENS ROAD, BRIGHTON, BN13XD UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed new licence application in an area of the City which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Cumulative Impact Area (CIZ) (as defined in the BHCC Statement of Licensing Policy) and seeks the following hours and licensable activities:

Late Night Refreshment (Both)

Every Day

23:00 – 03:00

Opening hours

Every Day:

23:00 – 03:00

Paragraph 3.1.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

“The licensing authority, after careful consideration, has determined that the concentration of licensed premises in an area of the city centre is causing problems of crime and disorder.”

In accordance with the Statement of licensing policy this application would be a “NO”

This premises lies within what was the Regency Ward which within the Brighton & Hove Public Health Framework for Assessing Alcohol Licensing and is ranked number 1 for All injury Violence, All violence against the person and Sexual Offences. Additionally, it’s ranked number 2 for Police recorded alcohol related incidents, demonstrating the higher risk to the Licensing Objective of the Prevention of Crime and Disorder in this area.

Recent incident & crime statistics indicate that during the period of 18th May 2024 and 16th May 2025 there were 283 crimes linked to Queens Road and surrounding side roads. The majority of these incidents were recorded as violent crime in a public place and thefts. This shows a slight increase in crimes from the previous search which was run between October 2023 – October 2024 where there were 271 crimes recorded. There was also 9 Sexual Assaults reported along Queens Road in this 12-month period.

With the area already experiencing high number of incidents which occur throughout the day and night, permitting a premises to be open into the night time economy is likely to increase incidents in the locality, which is already a busy thoroughfare road to and from the city centre and the train station and is populated with many Licensed premises all varying from Pubs, off licences and Late Night Refreshment venues.

PC Wade and Licensing officer Hannah Staplehurst worked a night shift on Saturday 10th May 2025. At 23:05 they travelled along Queens Road and witnessed large groups of people congregating at a Late Night Refreshment (LNR) premise. We were unable to access this premises due to the crowd growing along the pavement, however at this time Station Grill 62 Queens Road was closing and this dispersed some of the groups and encouraged them to continue towards the train station.

At 23:45 we visited Queens Road again to visit the LNR premises and crowds were less busy and manageable inside the premises however we were unable to stop due to a few arrests that were taking place on the opposite side of the road, because Police Constables had been assaulted and Queens Road was busy with a number of police vehicles and Police Constables.

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering food and drink into the early hours encourages persons who may be under the influence of alcohol or drugs to remain in the area, which has a number of residential

flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be problematic.

I have previously worked with the applicant throughout the consultation period for their first application which was submitted in 2024 and after a licensing hearing this application was refused. Sussex Police are aware the applicant has appealed this decision and are concerned that should be this second application be granted while the first application is in the appeal process, this would encourage a Judge to grant a second licence at appeal as the police concerns and crime data would be dismissed.

The applicant may have been trading during a day for a few months now, but they haven't traded along Queens Road, nor in Brighton during the Night time economy and seemed to have little understanding of the crime and disorder associated with this area. Security has since been offered when requested by the police, the applicant has not offered specific days and times themselves.

Sussex Police are also confused over what the applicant is applying for. I note on this application they are now applying for 03:00 every day which is an hour longer on a Sunday – Thursday than the first application.

The application also says they are a restaurant offering delivery services, but in Subsection A under section 18 of the application it states *"Also, will offer collection services for customers already existing in the city centre"*

During this Consultation period, Licensing Officer Hannah Staplehurst asked for clarification for what the applicant was applying for, and asked for clarity why this application had been submitted while an appeal is progressing with the first court hearing imminent.

Please find below part of the reply that was received

"My first application was not for take away. I confirmed many times that my shop is a restaurant and not a take away shop.

serving dine in , delivery and collection DOES NOT mean that it is a take away. all restaurants including Macdonalds and KFC are restaurants and they offer delivery and food collection services."

Sussex Police would disagree that during the first hearing the applicant stated he was applying for a restaurant as the applicant offered to have a hatch cut in the window at the front in order to pass food to customers waiting on the pavement. Which would possibly mean the tables and chair would have to be removed for this area.

Sussex Police would also disagree and would state that deliveries and collections are in fact take aways as the definition of a take away is where a customer buys food from a premises to be eaten elsewhere.

Sussex Police have little confidence in the applicant and fear should a licence be granted until 03:00 every day, Sussex Police could see an increase in crime and disorder as the applicant would not be able to operate knowledgeably.

Lastly there was issues raised around the Blue notice the applicant had to display as part of this application process. Licensing officer Hannah Staplehurst and PC Wade drove past on

the 24th April 2025 and they are able to confirm that there was no Blue Notice on display and spent photos to the BHCC Licensing team. This further raise concerns in the confidence of the applicant to complete licensing conditions.

Although we are unable to support this application and are now seeking refusal for the second time, if the Licensing Panel are minded to grant this application at the hearing, Sussex Police have attached conditions and ask that these conditions are added to the Premises Licence, taking into account the request that the premises trades only for deliveries from Midnight. The conditions being offered unfortunately do not mitigate fully the risks should this premises trade until 03:00am. They go some way to reduce incidents occurring within the premises itself but there are no conditions that can address the risks once customers have departed. The risks of them becoming a victim of crime or them partaking in criminal activity is one that will need to be dealt with by the emergency services. Or if public nuisance issues occur, then this will be for the environmental officers to pick up.

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

- Attached proposed conditions.

Yours sincerely,

REDACTED

**Insp Ben Morrison
Ops Planning and Events (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police**

Police Licensing Representation Letter 23rd October 2024

Police Station
John Street
Brighton
BN2 0LA

Email: brighton.licensing@sussex.police.uk

23rd October 2024

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

Dear Emily Fountain,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR STATION GRILL, 62 QUEENS ROAD, BRIGHTON, BN13XD UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed new licence application in an area of the City which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Cumulative Impact Area (CIZ) (as defined in the BHCC Statement of Licensing Policy) and seeks the following hours and licensable activities:

Late Night Refreshment (Both)

Sunday – Thursday: 23:00 – 02:00
Friday – Saturday: 23:00 – 03:00

Opening hours

Sunday – Thursday: 23:00 – 02:00
Friday – Saturday: 23:00 – 03:00

Paragraph 3.1.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

“The licensing authority, after careful consideration, has determined that the concentration of licensed premises in an area of the city centre is causing problems of crime and disorder.”

In accordance with the Statement of licensing policy this application would be a “NO”

This premises lies within what was the Regency Ward which within the Brighton & Hove Public Health Framework for Assessing Alcohol Licensing and is ranked number 1 for All injury Violence, All violence against the person and Sexual Offences. Additionally, it’s ranked number 2 for Police recorded alcohol related incidents, demonstrating the higher risk to the Licensing Objective of the Prevention of Crime and Disorder in this area.

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol, offering food and drink into the early hours encourages persons who may be under the influence of alcohol or drugs to remain in the area, which has a number of residential flats and properties. This increases the risk of crime and disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be problematic.

Recent incident & crime states indicate that during the period of 23rd October 2023 and 23rd October 2024 there were 271 incidents linked to Queens Road and surrounding close by side roads. The majority of these incidents were recorded as violent crime in a public place and thefts.

There is also 11 Sexual Assaults reported along Queens Road in this 12 month period.

With the area already experiencing high number of incidents which occur throughout the day and night, permitting a premises to be open into the night time economy is likely to increase incidents in the locality, which is already a busy thoroughfare road to and from the city centre and the train station and is populated with many Licensed premises all varying from Pubs, off licences and Late Night Refreshment venues.

I have attempted to work with the applicant throughout the consultation period. Please find attached to this letter the proposed conditions that were sent to the applicant. Sussex Police offered a condition that would allow the applicant to trade as a restaurant until Midnight but then lock their door and trade for deliveries only. Unfortunately, this condition has not been agreed, along with Conditions 5, 6, 7.

Conditions number 1, 3, 4, 8, 9 and 10 have been agreed.

However, a further concern which was highlighted following a phone conversation with Police Licensing Officer Hannah Staplehurst is, the applicant had no knowledge of the BHCC Statement of licensing policy and wasn't aware the premises is located in the CIZ. They haven't traded along Queens Road, nor in Brighton and seemed to have little understanding of the crime and disorder associated with this area.

Although we are unable to support this application and are now seeking refusal, if the Licensing Panel are minded to grant this application at the hearing, Sussex Police have attached the conditions proposed to the applicant and ask that these conditions are added to the Premises Licence, taking into account the request that the premises trades only for deliveries from Midnight. The conditions being offered unfortunately do not mitigate fully the risks should this premises trade until 02:00/03:00am. They go some way to reduce incidents occurring within the premises itself but there are no conditions that can address the risks once customers have departed. The risks of them becoming a victim of crime or them partaking in criminal activity is one that will need to be dealt with by the emergency services. Or if public nuisance issues occur, then this will be for the environmental officers to pick up.

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

- Attached proposed conditions.

Yours sincerely,

REDACTED

**Insp Daniel Eagle
Ops Planning and Events (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police**

Police Licensing Proposed Conditions

Station Grill, 62 Queens Road, Brighton Proposed Conditions

Timings

Restaurant until Midnight

Deliveries – until 02:00

Conditions

General

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.
2. The premises will operate as a restaurant until 23:59pm. From Midnight (00:00) until close the premises will be closed to customers (there will be no takeaways or eating in after that time), The premises door will be locked during these times and opened only to allow delivery persons to collect orders. and only deliveries will take place. Clear signage will be placed on the door to advising potential passing customers that the premises is closed.
3. All delivery orders shall be to a registered residential or business address. There shall be no deliveries to public/communal areas or open spaces.

Prevention of crime & disorder

4. Subject to GDPR guidance and legislation:
 - (a) 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 entrances/exits to the premises as well as any outside space. The system shall be on and recording at all times the premises licence is in operation.

(b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.

(c) CCTV footage will be stored for a minimum of 31 days

(d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.

(e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.

(f) 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 Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

(g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable - brighton.licensing@sussex.police.uk.

(h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by 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.

5. SIA licensed door supervisors shall be employed on any other occasions when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. The written risk assessment will take into account information or guidance offered by the police, and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.
6. 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 Crime Reduction Partnership (BCRP) or other similar organisation approved by Sussex Police should the BCRP not be in existence.
7. The premises will become a member of the Brighton Crime Reduction Partnership or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.

8. (a) 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 a manager at least once a month.
- (b) 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.

Any additional conditions offered up within the original application or agreed with any other responsible authority.

Public safety

Any additional conditions offered up within the original application or agreed with any other responsible authority.

Prevention of public nuisance

9. The management will ensure that delivery vehicles waiting or arriving to collect orders will be parked/waiting legally and not causing a public nuisance by way of obstructing the highway or footpaths.

Any additional conditions offered up within the original application or agreed with any other responsible authority.

Protection of children from harm

10. All staff will be trained in:

- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management.

The operator will have a policy in place assisting staff in how to deal with such situations.

All 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.

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.

Any additional conditions offered up within the original application or agreed with any other responsible authority.

REP B

Licensing Team
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Date: 21 July 2025
Our Ref: 2024/02430/LICREP/EH
Email: emilyfountain@brighton-hove.gov.uk

Dear Sarah Cornell,

SC CON END 25.07.2025 VALID PCD, PPN & CIZ (B)

RE: Licensing Act 2003 - Representation against the application for a new Premises Licence application for Station Grill, 62 Queens Road, Brighton, BN1 3XD

I refer to the application made by London Export and Import Ltd, for a new Premises Licence at Station Grill, 62 Queens Road, Brighton. The proposed hours are for Late Night Refreshment, every day 23:00 to 05:00 with opening hours of 24 hours a day every day.

I have concerns about this application and make a representation on the grounds of the prevention of crime and disorder and the prevention of public nuisance and that this application is contrary to our Statement of Licensing Policy (SoLP).

The council has a special policy to address cumulative impact, the special policy was set up because the Licensing Authority determined that the concentration of licensed premises and the subsequent numbers of people drawn into the city centre is causing exceptional problems of crime and disorder and public nuisance. The special policy will only be overridden in exceptional circumstances. New applications and variations to existing licences should normally be refused following relevant representations. This presumption of refusal can be rebutted by the applicant if they can show that their application will have no negative cumulative impact on licensing objectives including the prevention of crime and disorder and public nuisance. The Licensing Authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case.

Station Grill 62 Queens Road falls within the cumulative impact area (CIZ). The Council's Statement of Licensing Policy (SoLP) includes a Matrix approach for licensing decisions with

provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix Model recognises the diverse operation and different risks presented by different classes of licensed premises. It provides a vision of what the Licensing Authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications. Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances. The Matrix table clearly shows that late night takeaways in the CIZ should not be granted.

I acknowledge that the applicant has submitted extensive documentation as to why they consider their application to be exceptional. In addition that the applicant has offered some positive conditions to mitigate risk including BCRP membership, staff training and SIA risk assessment.

I also acknowledge that each application is to be considered on its own merits, however as this is the third time the applicant has applied for a late night take away in the CIZ in under a year, having had the previous two applications refused with one currently being appealed, the following are a real cause for concern:

- This application is for a considerably later time than previous ones 23.00 to 05.00 everyday with 24 hour opening times.
- It's still unclear that the applicant properly appreciates what the policy means in terms of cumulative impact.
- That not selling alcohol is not an exceptional circumstance in the context of applying for a late night refreshment licence.
- The application is still unclear as to how members of the public for example passing by the premises will be able to place orders for takeaway/collection.

I believe that granting this application will likely add to additional burdens and problems to the already challenging area, especially if customers are collecting orders from the premises and deliveries are taking place between midnight and 05.00. I therefore wish to bring the application to the attention of the panel so that they can question the applicant further and decide whether this application constitutes exceptional circumstances to depart from the policy.

Yours sincerely

REDACTED

Emily Fountain
Licensing Officer
Licensing Team
Regulatory Services

Appendix D

S1

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police
Licensing, and the Court

From: REDACTED

Address REDACTED

Date: 01/07/2025

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. Protection of Children from Harm: All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
 - All training undertaken by staff members will be fully documented and recorded.
 - All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
 - 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and has more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, **NO ALCOHOL WE BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially

when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they’ve been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.
32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
 - We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.
33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Sent to: EHL.licensing@brighton-hove.gov.uk
Signed: REDACTED
Date: 01/07/2025

Signature: REDACTED D

S2

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

From: REDACTED

Address: REDACTED

Date: 02/07/2025

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives
As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.
2. Unique and Valuable Food Offering
Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.
3. High Demand for Late-Night Food
As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable

option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards,

and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. Protection of Children from Harm: All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
- All training undertaken by staff members will be fully documented and recorded.
 - All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
 - 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway

and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, **NO ALCOHOL WILL BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
 - In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.
31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.
32. As residents travelling to and from Brighton station due to my work, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
 - We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.
33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.
34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED

Signature: REDACTED

Date : 02/07/2025

S3

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

From: REDACTED

Address: REDACTED

Date: 30/06/2025

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours.

The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the

neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. **Exceptional Circumstances Justify This Licence**

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the ClZ policy.

12. **Hygiene and Quality Compared to Other Late-Night Options**

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. **Prevention of Crime and Disorder:** CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. **Public Safety:** The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. **Prevention of Public Nuisance:** Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. **Protection of Children from Harm:** All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- **Conflict management.** The operator will have a policy in place assisting staff in how to deal with such situations.
 - All training undertaken by staff members will be fully documented and recorded.
 - All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
 - 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. The menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises.

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

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24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

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Given the type of cuisine, **NO ALCOHOL WILL BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

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28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this

type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. They are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED
30/06/2025

Signature: REDACTED

Date :

S4

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

From: REDACTED

Address: REDACTED

Date: 29/06/2025

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through

practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such

an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. Protection of Children from Harm: All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
 - All training undertaken by staff members will be fully documented and recorded.

- All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.
19. Clear incident logs, refuse control, and staff training policies are in place.
20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can-do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, **NO ALCOHOL WILL BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents travelling to and from Brighton Station, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate

under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. They are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signature: REDACTED

Date : 29/06/2025

S5

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I

understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

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- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.

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Conclusion:

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Signed:

REDACTED

Date: 01/07/2025

S6

SC CON ENDS 25.07.2025 VALID

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

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- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. They are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED

Date: 01/07/2025

S7

SC CON ENDS 25.07.2025 VALID

From REDACTED

Sent: 03 July 2025 03:21

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement in Support of Late Night Refreshment Licence Application Premises

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it

a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. Promotion of the Licensing Objectives

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area

B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.

C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.

D. Protection of Children from Harm: All staff will be trained in:

- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
- All training undertaken by staff members will be fully documented and recorded.
- All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre,

particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can-do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, NO ALCOHOL WILL BE SOLD, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary

factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. They are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED

Date: 01/07/2025

S8

SC CON ENDS 25.07.2025 VALID

From: REDACTED

Sent: 02 July 2025 22:52

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Letter of Support – Late Night Refreshment Licence Application Business

Letter of Support – Late Night Refreshment Licence Application

Business: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address:

REDACTED

I am a frequent guest at Station Grill, located at 62 Queens Road, Brighton, and I am submitting this statement to express my full support for their application for a Late Night Refreshment Licence (excluding the sale of alcohol).

Responsible Operation and Commitment to Licensing Goals

From my frequent visits, I can confidently say that Station Grill is run with a high level of professionalism. The staff are always respectful and courteous, and the space is safe, tidy, and welcoming. The manager, who I understand is a licensed SIA door supervisor, maintains an atmosphere of calm and control. I've seen first-hand that the business supports the four licensing objectives through its strong hygiene, staff conduct, good customer service, and proactive issue resolution.

Unique and Authentic Culinary Experience

Station Grill offers a food selection that combines Egyptian and Turkish cuisine—a combination that's not available anywhere else in Brighton, particularly during the late-night hours. Their meals are freshly prepared, consistently delicious, and culturally enriching. This diversity adds value to Brighton's culinary reputation.

Community Demand for Late-Night Food

I often need access to food during late hours, and options are limited. Station Grill is already a go-to venue for students, NHS workers, security teams, and other people working evening shifts. Giving them permission to open later would benefit many Brighton residents.

Central Location and Steady Foot Traffic

Queens Road serves as a key pedestrian route between Brighton Station and the town centre. Late-night footfall is high, and having a clean, alcohol-free food spot like Station Grill open during those hours would serve a public need.

Security and Cleanliness in the CIZ

Even though the business is within the Cumulative Impact Zone (CIZ), I have always felt secure while dining there. The well-trained staff, sanitary conditions, and well-managed service make Station Grill an ideal candidate for a CIZ exception.

Planning Is Not a Factor

To my knowledge, this situation is only about licensing. Planning permission is not needed for serving takeaway or delivery food after midnight. Therefore, planning concerns should not influence the decision.

Compatibility with Matrix Policy

Brighton's Licensing Matrix supports restaurant operations until midnight. Since Station Grill does not serve alcohol and already complies with good practice, granting permission to stay open later within safe parameters would be entirely appropriate.

No Connection to Local Crime

Based on community discussions and local reports, most night-time disturbances stem from alcohol-related venues. I've never seen or heard of any issues linked to Station Grill, which operates as a food-only business.

Manager's Professionalism and Experience

The manager brings late-night sector experience, having previously worked on West Street. In the time Station Grill has been open, there have been no incidents. This proves that the team is capable of managing a safe late-night operation.

No Harm to the Neighbourhood

Granting the application will not harm the area. On the contrary, having a calm, clean food outlet that doesn't sell alcohol could improve the night-time environment by offering people a safe space to eat and relax.

This Case Warrants a CIZ Exception

Due to the business's high hygiene standards, original menu, and responsible leadership, I believe this application is strong enough to be treated as an exceptional case within the CIZ.

Hygiene and Standards Exceed Nearby Takeaways

Other nearby venues don't match the cleanliness or food quality offered by Station Grill. The closest alternative has a 3-star hygiene rating, while Station Grill boasts a 5-star rating and is the only place offering Egyptian food nearby.

Compliance with Licensing Objectives

The manager at Station Grill shows real commitment to fulfilling all four licensing aims:

A. Crime and Disorder Prevention:

There's full CCTV coverage inside and outside. Incident logs are kept. The SIA-accredited manager ensures crowd control and premises security.

B. Public Safety:

The premises meet fire and health safety regulations. Signage is clear, and access routes are safe.

C. Public Nuisance Prevention:

Noise is limited with controlled entry. Daily waste disposal is enforced. Customers are politely encouraged to leave the premises quietly.

D. Protection of Children from Harm:

All employees receive training to:

Identify vulnerable individuals due to drugs, age, or intoxication

Handle such situations using an internal conflict policy

Document training sessions

Share training records with local officials and police upon request

Participate in verbal refresher training every 8 weeks, with all sessions recorded

Late-Night Offering with Cultural Identity

Station Grill is the only late-night takeaway in Brighton offering authentic, freshly prepared Egyptian-Turkish meals, available for both delivery and takeaway. It enhances the night-time economy with something truly unique.

Demand for Fresh Hot Food Late at Night

There is constant need for clean, quality food during late hours—especially among workers, students, and travellers. Existing venues don't fulfil that need effectively, and Station Grill steps up to fill that gap.

Excellent Location, According to Authorities

Sussex Police have acknowledged Queens Road as a high-traffic area. Station Grill is located perfectly to cater to late-night foot traffic safely and responsibly.

CIZ Exception Justified by Security Measures

While the venue is inside the CIZ, its high level of control and no-alcohol policy support an exemption:

Licensed door supervisor on site at night

Use of incident logs and staff training

No alcohol = lower public risk

Planning Permission Already Covered

Since Station Grill is a Class E(b) premises, it may operate as a restaurant, takeaway, and delivery service without planning permission—so long as takeaway isn't the dominant activity. Licensing is the only matter in question.

Matrix Framework and Practical Licensing

The Brighton & Hove matrix allows restaurants to remain open until midnight. Given Station Grill's food-only model, its extended hours request is in line with the spirit of current policy.

Crime Stats Not Applicable to This Venue

Most local crime is associated with alcohol-serving venues. Station Grill has never contributed to public disorder, so using general crime stats against them would be misleading.

Skilled Management with a Clean Record

The manager has been operating this business for over a year without any incident or complaint. His previous night-time food industry experience proves he can handle later hours effectively.

No Additional Cumulative Impact

The restaurant sells food only, has well-trained staff, and follows safety procedures. There is no indication that extended trading would increase crime, noise, or disturbance.

Strong Grounds for Licence Approval

Station Grill sells no alcohol, follows best practices, and serves a growing late-night demand. This is clearly a case where the licence should be granted on exceptional grounds.

Exceeds Hygiene Standards in the Area

Compared to other late-night takeaways nearby, Station Grill has a higher hygiene rating and offers a distinctive menu. Their 5-star score makes them a standout candidate.

Unbalanced Licensing Practices

It's troubling that older venues with lower hygiene continue to operate late, while newer businesses like Station Grill, with better standards, face resistance. This discourages progress and limits consumer choice.

Clear Disparity Between Neighbours

The business directly next door—at 61 Queens Road—has permission to open until 3:00 AM. Station Grill, at number 62, is not granted the same, despite operating more responsibly. If the difference is based on tenure or age, this may be discriminatory.

Licensing and Human Rights

The Licensing Policy acknowledges the Human Rights Act 1998:

Article 1 of the First Protocol protects the right to operate a lawful business. Blocking Station Grill's licence while permitting a similar neighbour to operate late could violate these rights.

Equal Treatment is a Licensing Requirement

All business owners deserve a fair chance, regardless of how long they've been trading. Station Grill has proven its value and compliance, and deserves equal opportunity.

We Need More Late-Night Food Options

Residents near the venue should not be forced to rely only on old establishments. We want choice, and denying new operators that chance limits our freedom as consumers.

A clear example: 61 Queens Road trades until 3:00 AM, while Station Grill is denied the same. This creates unfair market conditions.

Fair Access is a Basic Business Right

Station Grill operates lawfully, safely, and with high standards. They should not be denied the same late-night rights granted to others. Equal access is essential.

Valuable Community Asset

There's growing need for freshly cooked, culturally rich food during the night. Station Grill meets this demand and adds to the diversity of our city.

My Respectful Recommendation

In view of all these points, I ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence. They are reliable, hygienic, and ready to serve.

Summary Statement

Station Grill is a valuable, safe, and much-needed food venue in Brighton. Their licence application deserves your approval based on merit, responsibility, and community benefit.

Signed: REDACTED

Date: 3/07/2025

S9

SC CON ENDS 25.07.2025 VALID

From: REDACTED
Sent: 03 July 2025 09:07
To: REDACTED
Subject: Support Station Grill

Testimonial in Favour of Late Night Refreshment Licence

Establishment: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Presented to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name REDACTED
Address: REDACTED

As a frequent diner at Station Grill, located at 62 Queens Road, Brighton, I am providing this statement to fully endorse their application for a Late Night Refreshment Licence (not involving alcohol).

Effective Leadership and Support for Licensing Principles

As someone who regularly eats there, I've consistently observed the strong, responsible leadership at Station Grill. The staff are friendly, professional, and attentive, and the place is always tidy and welcoming. The manager, who I'm aware holds an SIA licence, maintains a calm and orderly setting. He supports the four licensing aims by promoting cleanliness, respectful interaction, and swift handling of any incidents.

Rare and Authentic Food Choices

Station Grill serves a special blend of Turkish and Egyptian food, not offered elsewhere in Brighton—especially late at night. Their meals are always made fresh and are known for their taste and authenticity. The menu brings cultural richness to the city's dining scene.

Essential Late-Night Food Access

As someone who's often out late, I struggle to find fresh, high-quality meals at those hours. Station Grill has become a dependable choice for NHS staff, students, security teams, and night workers. Extending their hours would truly serve community needs.

High-Footfall, Central Location

Queens Road connects Brighton Station to the heart of the city and stays busy well into the night. Many passersby need access to a clean, alcohol-free location to get food during these hours.

Safe and Sanitary Premises

Although located in the CIZ, Station Grill maintains a safe and well-run environment. The presence of trained staff and their strong hygiene practices make this a trustworthy business, meriting an exemption to usual CIZ rules.

No Need for Planning Approval

To my knowledge, this matter pertains only to licensing. Selling hot food for takeaway or delivery past midnight doesn't require planning approval, so this shouldn't obstruct the licence being granted.

Consideration Under Matrix Policy

Brighton's matrix policy already supports restaurants staying open until midnight. Since Station Grill sells food without alcohol and operates responsibly, it's reasonable to let them extend their hours under regulated conditions.

No Contribution to Local Crime

From what I've gathered from conversations and media, late-night disruptions are typically linked to alcohol. Station Grill, being a food-only venue, has not been linked to any issues or misconduct.

Skilled and Trustworthy Management

The manager has a background in the late-night food industry, including experience on West Street. Since Station Grill opened, there have been no problems, confirming their capability to run the venue responsibly during extended hours.

No Negative Neighbourhood Effect

Granting the licence would not disrupt the local environment. A clean, controlled venue open late could even help reduce late-night noise and misbehaviour by offering people a safe place to eat and unwind.

Why This Licence Should Be Granted

With a unique menu, solid public support, excellent hygiene, and responsible operation, this venue stands out as an exceptional case that deserves an exemption from standard CIZ rules.

Hygiene and Quality Outperform Competitors

Nearby takeaways often lack the same level of cleanliness, with the closest having a 3-star hygiene rating. Station Grill holds a 5-star rating and is the only one locally offering Egyptian food—strengthening their application.

Promoting the Licensing Objectives

Station Grill's manager is thoroughly committed to upholding all four licensing pillars:

A. Crime and Disorder Prevention:

The venue is monitored by CCTV inside and outside. Incidents are recorded. The SIA-licensed manager ensures safety by managing potential crowds.

B. Public Safety Assurance:

The restaurant follows fire safety rules, offers clear signs, and maintains safe entry/exit paths.

C. Minimising Public Nuisance:

They control waste daily, keep noise low through managed entry, and encourage customers to exit quietly.

D. Protecting Minors from Harm:

All employees are trained to:

- Identify vulnerable people (due to age, intoxication, drugs, etc.)
- Handle situations using the venue's conflict management policy
- Maintain documented training logs
- Share training records with police or council officials upon request
- Receive refresher courses every 8 weeks, all logged with date/time

One-of-a-Kind Cuisine and Community Role

Station Grill is Brighton's only late-night provider of freshly made Egyptian-Turkish cuisine. Their menu adds meaningful culinary value to the city's late economy.

Strong Demand from Locals

Late-night hot meals are in high demand from commuters, students, hospital staff, and security personnel. Most nearby venues don't meet these needs.

Strategically Positioned

Queens Road, as noted by Sussex Police, is a heavily used corridor between the station and the city centre. Station Grill is ideally placed to serve the public during these hours.

Justification for CIZ Exemption

Although the CIZ applies to this area, Station Grill's secure setup and responsible management warrant treating this as a special case:

- SIA-licensed door supervisor present at night
- Incident log, waste procedures, and staff protocols in place
- Alcohol-free operation reduces risk of late-night disorder

Clarifying Planning Permission

The licence application is distinct from planning requirements. Under Class E(b), Station Grill can offer collection, takeaway, and delivery without needing separate planning approval—so long as these remain secondary services.

Matrix Framework Consideration

The Council already allows restaurants to open until midnight. Given that Station Grill doesn't serve alcohol, a modest extension—under safeguards—should be supported.

Crime Stats Are Irrelevant

Local crime reports mainly involve alcohol. Station Grill's food-only model hasn't contributed to disorder and should be excluded from those statistics.

Proven Managerial Experience

With over a year of managing late-night venues—including one on West Street—the current manager has consistently run Station Grill without incident.

No Accumulative Harm

Because it's food-only, with trained staff and safety controls, Station Grill won't add pressure to crime, noise, or public safety.

A Case Deserving Special Approval

With no alcohol served, a clean record, strong community need, and a distinct menu, this is clearly a case that qualifies for an exemption from policy norms.

Food Quality and Hygiene Set the Bar

Nearby takeaways don't meet the same standards. Station Grill has earned a 5-star hygiene rating and offers an unmatched Egyptian menu—further supporting their application.

Unfair Licensing Practices

It's troubling that less sanitary venues stay open late while newer, cleaner ones are blocked. This creates a skewed market, like an informal curfew, and contradicts Brighton's inclusive values.

Discrimination Concerns

It's unjust that the takeaway next door can trade until 3 AM while Station Grill cannot. Age or length of business shouldn't affect fair treatment. The younger manager is just as capable and committed.

Licensing Policy and Human Rights

The policy acknowledges the relevance of the Human Rights Act 1998:

Article 1 of the First Protocol protects the right to operate a lawful business free from unfair limitations. Blocking this licence, despite responsible operation, may breach those rights—especially when next door is allowed to open late.

Treat All Businesses Equally

Owners of all backgrounds and experience levels deserve equal treatment. Station Grill has met every requirement to run safely and fairly, and should be permitted to trade equally.

Local Residents Deserve More Options

Residents want variety in late-night food. Blocking licences for new businesses restricts our choices and gives older venues a monopoly.

This practice favours long-established venues while newer ones—often run by younger individuals—face unnecessary barriers. Station Grill at 62 Queens Road deserves the same rights as the takeaway at 61 Queens Road.

Equal Opportunity and Human Rights

Fair business access is essential. Denying Station Grill equal trading terms violates that principle and may infringe on basic rights to fair enterprise.

Strong Local Appetite for Good Food

Clean, fresh food options like those from Station Grill are in demand—especially when other venues lack healthy offerings. This business fills a major gap.

Request for Approval

Given all this, I ask the Licensing Authority, Sussex Police, and the Court to grant Station Grill's Late Night Refreshment Licence based on the facts, not outdated bias.

Final Summary

Station Grill is a standout in Brighton's food scene. It's safe, diverse, well-managed, and needed. Please approve their application.

Signed: REDACTED

Date: 3/07/2025

S10

SC CON ENDS 25.07.2025 VALID

From: REDACTED
Sent: 03 July 2025 10:08
To: REDACTED
Subject: Support Station Grill

2- Supportive Testimony for Late Night Refreshment Licence Application

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED
Address: REDACTED

As a loyal patron of Station Grill at 62 Queens Road, Brighton, I am submitting this statement in full support of their request for a Late Night Refreshment Licence (non-alcoholic).

Committed Management and Upholding Licensing Principles

Being a regular customer, I can personally confirm the high standard of management at Station Grill. Staff members are courteous and operate in a clean, secure, and welcoming setting. The manager, who I understand is SIA certified, effectively maintains a composed and well-regulated atmosphere. Their practices promote the four licensing objectives through actions like cleanliness, courteous service, effective communication, and fast problem resolution.

Distinctive and Culturally Rich Menu

Station Grill serves a rare mix of Egyptian and Turkish dishes, unavailable elsewhere in Brighton—especially late at night. The freshly cooked meals are notable for their authenticity and rich taste. This offering adds significant cultural depth to the city's food options.

Consistent Need for Late-Night Meals

Being someone who often seeks late-night food, I've found few dependable choices. Station Grill already supports night-shift workers, NHS employees, students, and security staff. Allowing them to stay open longer would benefit many in the area.

Excellent Location for Footfall

Queens Road, leading from Brighton Station to the town centre, is a busy and active location. Late-night foot traffic is common, and many people could benefit from a clean, alcohol-free food venue along that route.

Security, Safety, and Hygiene

Though located within the Cumulative Impact Zone (CIZ), Station Grill maintains a secure and hygienic environment. The trained team and cleanliness make this a responsible business that merits being treated as an exception to CIZ restrictions.

Licensing Only—No Planning Barriers

To my knowledge, this is purely a licensing issue, and no extra planning approval is necessary to sell hot takeaway food after midnight. This should not hinder the application's success.

Alignment with Matrix Policy

Brighton & Hove's Licensing Matrix permits restaurants to operate until midnight. Since Station Grill doesn't serve alcohol and already functions responsibly, an extended licence under strict control is reasonable.

No Connection to Crime or Disturbance

Conversations and reports show that most disturbances in the area stem from alcohol-related venues. Station Grill, which doesn't sell alcohol, has never been associated with any public nuisance or disorder.

Proven Experience and Responsible Oversight

The manager brings extensive experience from working in the late-night food industry, including West Street. Since opening, Station Grill has operated without incident, demonstrating it can responsibly manage late hours.

Positive Influence on the Area

This licence will not harm the local area. On the contrary, having a secure, well-run, alcohol-free establishment open late can help reduce late-night noise and disorder by offering a place to relax and eat.

Why This Case Deserves Consideration

Due to its distinct food, strong community support, hygiene, and operational responsibility, this case is exceptional and should be approved despite the CIZ designation.

Hygiene and Standards Surpass Competitors

The closest alternative late-night takeaway holds only a 3-star hygiene score, while Station Grill boasts a 5-star rating. No local rivals serve Egyptian cuisine either, making this venue a standout option.

Support for Licensing Objectives

Station Grill's manager is devoted to the four licensing principles:

A. Preventing Crime and Disorder: CCTV is set up covering key areas inside and out. All incidents are logged. As an SIA licence holder, the manager can control crowds and maintain public safety.

B. Ensuring Public Safety: The location follows fire and safety regulations with visible signs and safe access routes.

C. Avoiding Public Nuisance: Daily waste removal, minimal noise, and managed entry reduce disruption. Customers are encouraged to leave quietly.

D. Protecting Children from Harm: Staff receive training to:

Identify vulnerable individuals (due to age, intoxication, or drugs)

Handle conflict using a clear policy

Log and document all training sessions

Present training records to Sussex Police or regulatory bodies when asked

Participate in refresher training at least every 8 weeks with all sessions logged.

Unparalleled Food and Community Relevance

Station Grill is the only late-night provider of combined Egyptian and Turkish meals in Brighton. Their freshly prepared food for delivery and collection enriches Brighton's night economy.

Clear Local Demand

NHS staff, students, security workers, and late-night travellers create consistent demand for quality food. This need is not met by current offerings.

Location Suited for Service

Sussex Police recognise that Queens Road is a major route with heavy footfall from the train station. Station Grill is well-positioned to meet that demand.

CIZ Placement Offset by Safety Efforts

Though in the CIZ, the business is an exception due to proactive safety protocols:

A licensed SIA door supervisor on duty at night

Incident logging, cleanliness, and trained staff

No alcohol service, reducing potential issues

Planning Clarified

As a Class E(b) premises, the venue may offer delivery, takeaway, or collection without additional planning consent—as long as these remain secondary to the restaurant's primary function.

Matrix Policy Alignment

While the Matrix supports restaurants until midnight, Station Grill wants slightly extended hours—justified by its non-alcoholic nature and strong safeguards.

Crime Statistics Not Relevant

Area crime often links to alcohol. Since Station Grill sells only food, it hasn't contributed to any such incidents.

Qualified Management

The manager, an SIA licence holder, has worked in similar late-night roles before, including a kebab shop on West Street. Station Grill has operated over a year without any complaints or issues.

No Added Cumulative Impact

Because the venue sells food only and is responsibly managed, there's no additional burden on public safety, noise, or disorder.

Unique Circumstances Support Licence

No alcohol, high hygiene standards, and unique cultural offerings create a case deserving an exemption from policy limitations.

Excellence in Hygiene and Authenticity

Nearby late-night venues fall short in comparison. Station Grill's 5-star hygiene rating and cultural menu make it a valuable outlier.

Concerns About Unfair Practices

It's troubling that older, less clean venues can stay open while new, cleaner ones like Station Grill face resistance. This suggests an informal curfew that doesn't reflect Brighton's values.

Signs of Unequal Treatment

The business next door at 61 Queens Road trades until 3:00 AM. Denying Station Grill the same chance—possibly due to the owner's youth or shorter tenure—is unfair and potentially discriminatory.

Respect for Human Rights

The Licensing Policy mentions the Human Rights Act 1998:

Article 1 protects the peaceful use of property, including running a business. Refusing this licence could violate those rights when an adjacent business operates longer under similar conditions.

Every Business Deserves a Fair Shot

Owners of all ages and durations should be assessed fairly. Station Grill's safety, professionalism, and service merit an equal chance to trade.

Resident Needs and Equal Access

As locals, we want more late-night food options—not just old establishments. Blocking new licences shrinks our choices and benefits only older businesses.

This bias disadvantages newer, younger owners—preventing them from accessing opportunities open to others in the past. Station Grill at 62 Queens Road deserves the same late-night rights granted to 61 Queens Road.

Economic Justice and Community Value

All legitimate businesses should compete under equal conditions. Station Grill's fairness case also aligns with human rights and community interest.

Community Demand is Unmet

The lack of late-night healthy options, especially Egyptian/Turkish food, is deeply felt. Station Grill would fill this gap.

Final Request

Based on all the above, I kindly ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence.

Final Words

Station Grill contributes significantly to Brighton's nightlife. It is secure, unique, responsible, and addresses an unmet need. I respectfully urge approval of this licence.

Signed REDACTED

Date: 3/07/2025

S11

SC CON ENDS 25.07.2025 VALID

From: REDACTED
Sent: 03 July 2025 05:29
To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>
Cc: REDACTED
Subject: Witness statement

Greetings ,

This is REDACTED ,

Address: REDACTED

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police
Licensing, and the Court

From:

Address :

Date:

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. **Busy and Well-Suited Location**
Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.
5. **Security and Cleanliness**
Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.
6. **Clarification on Planning**
From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.
7. **Matrix Policy Considerations**
The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.
8. **No Link to Crime or Disorder**
From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.
9. **Experienced and Reliable Management**
The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.
10. **No Negative Impact on the Area**
Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.
11. **Exceptional Circumstances Justify This Licence**
Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. Protection of Children from Harm: All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
 - All training undertaken by staff members will be fully documented and recorded.
 - All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
 - 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and has more than a year of experience working in the night-time economy, including late-night kebab shop on

West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, **NO ALCOHOL WE BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.

- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.
31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.
32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
 - We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.
33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.
34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally

enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed:

Signature:

Date :

S12

SC CON ENDS 25.07.2025 VALID

From: REDACTED

Sent: 03 July 2025 16:04

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>;
bahaa.azmy1@yahoo.com

Subject: Support for Station Grill

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is

freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

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B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.

C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.

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- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
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- All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can-do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, NO ALCOHOL WILL BE SOLD, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED

Date: 01 / 07 / 2025

S13

From: REDACTED

Sent: 06 July 2025 02:09

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk REDACTED

Subject: Support Statement – Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Dear sir / madam,

my Name: REDACTED

Address: REDACTED

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a loyal customer of Station Grill, located at 62 Queens Road, Brighton, and I am submitting this written testimony in full support of their application for a Late Night Refreshment Licence (no alcohol to be served).

Management Standards and Support for Licensing Principles

As a regular diner, I've observed how professionally the restaurant is operated. The staff are always friendly and attentive, and the premises are clean and safe. The

manager—who also holds an SIA door supervisor licence—ensures that the venue stays calm and well-regulated. He actively upholds the four licensing objectives through solid hygiene practices, respectful customer interactions, clear communication, and fast response to concerns.

Distinct Menu that Adds to Brighton’s Food Culture

Station Grill offers an uncommon menu featuring Egyptian and Turkish dishes. These aren’t available from other local venues, especially during late-night hours. Their food is fresh and high in quality. This unique cultural blend adds to the city’s culinary variety and appeal.

The Need for Late-Night Food Options

Late-night access to healthy, hot meals is difficult in Brighton. Station Grill already caters to a range of essential workers—NHS staff, students, night-shift employees, and security teams. Extending their opening hours would meet ongoing demand in the community.

Busy Location Ideal for Serving Late-Night Public

Queens Road is one of the most used routes connecting Brighton Station to the city centre. I regularly see many people walking past late at night. A food-only, clean, and alcohol-free place like Station Grill would serve this foot traffic well.

Clean, Safe Environment within the CIZ

Although situated in the Cumulative Impact Zone (CIZ), Station Grill consistently feels safe. Staff are trained, service is controlled, and cleanliness is a priority. These factors support making an exception to the CIZ limitations in this case.

Planning Permission Is Not Relevant Here

As I understand it, this application relates only to licensing. The business does not require additional planning permission to provide takeaway or delivery of hot food after midnight. Therefore, planning concerns should not influence the outcome.

Fit Within the Licensing Matrix

The Council’s licensing matrix supports food establishments staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it is reasonable to allow them to extend their hours under well-monitored conditions.

No Link to Local Crime or Disturbances

Reports and conversations show that most late-night incidents stem from alcohol-related activity. As a strictly food-based business, Station Grill has never been associated with disorderly behaviour. I’ve never witnessed or heard of any problems there.

Leadership with Proven Track Record

The manager has prior experience running late-night food operations, particularly in Brighton's busy West Street area. Since Station Grill opened, there have been no complaints or incidents, demonstrating that the venue is run with professionalism and safety in mind.

No Harm to the Community or Neighbourhood

This licence will not lead to any disruption. In fact, having a well-maintained, late-opening venue that does not serve alcohol might reduce late-night disorder by providing a peaceful environment for people looking to eat.

Clear Justification for Making an Exception

Considering the high hygiene rating, original food offerings, strong community backing, high community support, and responsible conduct, this licence application should be treated as an exceptional case under the CIZ rules.

Better Hygiene and Quality Than Other Takeaways

Nearby late-night takeaways often do not meet the same cleanliness and quality standards. The closest has a 3-star hygiene score, whereas Station Grill has a 5-star rating. Also, no other late-night outlet nearby serves Egyptian food.

Full Alignment with Licensing Objectives

The Station Grill team, especially the manager, has shown dedication to upholding the four licensing goals:

A. Crime and Disorder Prevention:

All areas inside and outside the premises are covered by CCTV. Incident logs are maintained. The manager's SIA qualification gives him the skills to manage safety and potential crowds effectively.

B. Public Safety:

Fire and safety rules are followed fully. The restaurant has clear signage and safe access in and out.

C. Nuisance Prevention:

Noise is kept to a minimum through controlled customer entry. Waste is managed daily, and customers are politely encouraged to leave without disturbance.

D. Child Protection:

Staff are trained to:

- Identify vulnerable individuals due to age, alcohol, or substance use
- Handle such situations using structured conflict management procedures
- Keep records of all training

- Provide training documentation to authorities on request
- Undergo refresher training sessions every eight weeks, with each session recorded

The Only Venue Offering This Unique Cuisine Late at Night

Station Grill is the sole provider of a combined Egyptian and Turkish menu available for late-night takeaway and delivery in Brighton. This gives them a distinct place in the city's night-time food economy.

Existing Demand from the Local Public

The demand for hot food late at night is real, especially from shift workers, students, and others in need of a quick, clean meal. Station Grill is already playing an important role in meeting that demand.

Location Confirmed as Busy by Police

Queens Road is known for its high volume of pedestrians at night. Sussex Police have acknowledged this fact. Station Grill is ideally positioned to meet that demand safely and efficiently.

High Standards Make This a Justified CIZ Exception

Even within the CIZ, Station Grill is a safe and well-regulated operation. Key safety practices include:

- An on-site SIA-certified door supervisor
- Clearly maintained incident logs
- Structured staff training and waste management
- A complete absence of alcohol sales

Planning Requirements Already Satisfied

As a Class E(b) business, Station Grill has the right to provide takeaway and delivery services without new planning consent—provided these activities remain secondary. This application is a licensing matter only.

Within the Scope of the Matrix Policy

Restaurants are permitted to trade until midnight under the matrix. Given that Station Grill does not sell alcohol and operates under control, their application for slightly extended hours is well within reason.

Crime Statistics Do Not Apply to This Venue

Most late-night crime in this area is linked to drinking. Since Station Grill is food-only and has no history of issues, it should not be associated with unrelated crime statistics.

Manager Is Qualified and Responsible

The current manager has more than a year's experience managing a night-time food business, including on West Street. In that time, he has operated Station Grill without any incident—a clear sign of his professional conduct.

No Cumulative Impact on the Area

Station Grill is responsibly run, offers food only, and has well-trained staff. The business will not contribute negatively to public safety, noise levels, or local nuisance.

A Special Case That Merits Approval

With no alcohol sales, a high hygiene score, cultural contribution, and clear public demand, this application should be seen as exceptional and deserving of an approved licence.

Top Hygiene and Distinct Menu Choices

Other late-night food options cannot compare in terms of cleanliness or authenticity. Station Grill's 5-star hygiene rating and unique Middle Eastern menu set them apart in the area.

Unfair Licensing Restrictions Must Be Reviewed

Older venues with lesser hygiene ratings are being allowed to trade until late, while newer, cleaner venues like Station Grill are being limited. This creates an unfair advantage and restricts competition and consumer choice.

Unequal Licensing Between Neighbouring Businesses

It's troubling that the takeaway next door at 61 Queens Road can trade until 3:00 AM, while Station Grill at 62 is denied that opportunity. If this difference is based only on how long the business has been open or the age of the owner, that is discriminatory.

Human Rights Must Be Respected

The Licensing Policy recognises the Human Rights Act 1998:

Article 1 of the First Protocol protects a person's right to run a lawful business. Refusing Station Grill the same rights enjoyed by neighbouring venues may constitute a breach of this protection.

Equal Opportunities for All Businesses

All business owners—regardless of experience or age—should be treated with the same level of fairness. Station Grill is safe, compliant, and competent, and should receive an equal chance to trade.

Brighton Residents Deserve More Options

As a local resident, I believe we should have access to new, clean, and high-quality food venues. Blocking new businesses in favour of older ones limits our choices and sets a worrying precedent.

The difference in hours between 61 and 62 Queens Road highlights the problem clearly. One can stay open until 3:00 AM, while the other is restricted. That creates an unfair business environment.

Trading Rights Must Be Equal

Businesses should be judged based on their safety and quality—not on how long they've existed. Station Grill meets all criteria and should be allowed to compete equally.

Station Grill Serves a Clear Community Role

Late-night access to nutritious and culturally significant food is increasingly rare. Station Grill fills this gap in a professional, safe, and responsible manner.

Closing Appeal

In light of all the above points, I respectfully request that Brighton & Hove City Council Licensing Authority, Sussex Police, and the Court grant Station Grill the Late Night Refreshment Licence. The business is a valuable, clean, and community-serving venue.

Final Summary

Station Grill is a reliable, distinctive, and well-run part of Brighton's food scene. Their licence application deserves to be approved based on public need, responsible operation, and fairness.

Signed:

Date: 06/07/2025

S14

From: REDACTED

Sent: 11 July 2025 02:01

To: REDACTED

Subject: Support for station Grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My name is : REDACTED

Address: REDACTED

Dear sir / madam,

Sorry for bothering you, But I sent this supporting statement before using my friend's (REDACTED) (I CC him in this email)email address, because I did not have access to the internet and to my email at that time.

But when I visited Station Grill again, I was told to send it again to be validated.

so, please accept my apologies, and accept this statement through my email address to be validated.

My name is REDACTED

Address: REDACTED

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. Promotion of the Licensing Objectives

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area

B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.

C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.

D. Protection of Children from Harm: All staff will be trained in:

- Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
- All training undertaken by staff members will be fully documented and recorded.
- All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public

commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.

19. Clear incident logs, refuse control, and staff training policies are in place.

20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can-do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, NO ALCOHOL WILL BE SOLD, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a

neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they’ve been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points, I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city’s late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed: REDACTED

Date: 01 / 07 / 2025

S15

From: REDACTED

Sent: 04 July 2025 15:17

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Subject: Night Refreshment Licence

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Supportive Testimony for Late Night Refreshment Licence Application

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name:1- Name: REDACTED

Address: REDACTED

As a loyal patron of Station Grill at 62 Queens Road, Brighton, I am submitting this statement in full support of their request for a Late Night Refreshment Licence (non-alcoholic).

Committed Management and Upholding Licensing Principles

Being a regular customer, I can personally confirm the high standard of management at Station Grill. Staff members are courteous and operate in a clean, secure, and welcoming setting. The manager, who I understand is SIA certified, effectively maintains a composed and well-regulated atmosphere. Their practices promote the four licensing objectives through actions like cleanliness, courteous service, effective communication, and fast problem resolution.

Distinctive and Culturally Rich Menu

Station Grill serves a rare mix of Egyptian and Turkish dishes, unavailable elsewhere in Brighton—especially late at night. The freshly cooked meals are notable for their authenticity and rich taste. This offering adds significant cultural depth to the city's food options.

Consistent Need for Late-Night Meals

Being someone who often seeks late-night food, I've found few dependable choices. Station Grill already supports night-shift workers, NHS employees, students, and security staff. Allowing them to stay open longer would benefit many in the area.

Excellent Location for Footfall

Queens Road, leading from Brighton Station to the town centre, is a busy and active location. Late-night foot traffic is common, and many people could benefit from a clean, alcohol-free food venue along that route.

Security, Safety, and Hygiene

Though located within the Cumulative Impact Zone (CIZ), Station Grill maintains a secure and hygienic environment. The trained team and cleanliness make this a responsible business that merits being treated as an exception to CIZ restrictions.

Licensing Only—No Planning Barriers

To my knowledge, this is purely a licensing issue, and no extra planning approval is necessary to sell hot takeaway food after midnight. This should not hinder the application's success.

Alignment with Matrix Policy

Brighton & Hove's Licensing Matrix permits restaurants to operate until midnight. Since Station Grill doesn't serve alcohol and already functions responsibly, an extended licence under strict control is reasonable.

No Connection to Crime or Disturbance

Conversations and reports show that most disturbances in the area stem from alcohol-related venues. Station Grill, which doesn't sell alcohol, has never been associated with any public nuisance or disorder.

Proven Experience and Responsible Oversight

The manager brings extensive experience from working in the late-night food industry, including West Street. Since opening, Station Grill has operated without incident, demonstrating it can responsibly manage late hours.

Positive Influence on the Area

This licence will not harm the local area. On the contrary, having a secure, well-run, alcohol-free establishment open late can help reduce late-night noise and disorder by offering a place to relax and eat.

Why This Case Deserves Consideration

Due to its distinct food, strong community support, hygiene, and operational responsibility, this case is exceptional and should be approved despite the CIZ designation.

Hygiene and Standards Surpass Competitors

The closest alternative late-night takeaway holds only a 3-star hygiene score, while Station Grill boasts a 5-star rating. No local rivals serve Egyptian cuisine either, making this venue a standout option.

Support for Licensing Objectives

Station Grill's manager is devoted to the four licensing principles:

A. Preventing Crime and Disorder: CCTV is set up covering key areas inside and out. All incidents are logged. As an SIA licence holder, the manager can control crowds and maintain public safety.

B. Ensuring Public Safety: The location follows fire and safety regulations with visible signs and safe access routes.

C. Avoiding Public Nuisance: Daily waste removal, minimal noise, and managed entry reduce disruption. Customers are encouraged to leave quietly.

D. Protecting Children from Harm: Staff receive training to:

Identify vulnerable individuals (due to age, intoxication, or drugs)

Handle conflict using a clear policy

Log and document all training sessions

Present training records to Sussex Police or regulatory bodies when asked

Participate in refresher training at least every 8 weeks with all sessions logged.

Unparalleled Food and Community Relevance

Station Grill is the only late-night provider of combined Egyptian and Turkish meals in Brighton. Their freshly prepared food for delivery and collection enriches Brighton's night economy.

Clear Local Demand

NHS staff, students, security workers, and late-night travellers create consistent demand for quality food. This need is not met by current offerings.

Location Suited for Service

Sussex Police recognise that Queens Road is a major route with heavy footfall from the train station. Station Grill is well-positioned to meet that demand.

CIZ Placement Offset by Safety Efforts

Though in the CIZ, the business is an exception due to proactive safety protocols:

A licensed SIA door supervisor on duty at night

Incident logging, cleanliness, and trained staff

No alcohol service, reducing potential issues

Planning Clarified

As a Class E(b) premises, the venue may offer delivery, takeaway, or collection without additional planning consent—as long as these remain secondary to the restaurant's primary function.

Matrix Policy Alignment

While the Matrix supports restaurants until midnight, Station Grill wants slightly extended hours—justified by its non-alcoholic nature and strong safeguards.

Crime Statistics Not Relevant

Area crime often links to alcohol. Since Station Grill sells only food, it hasn't contributed to any such incidents.

Qualified Management

The manager, an SIA licence holder, has worked in similar late-night roles before, including a kebab shop on West Street. Station Grill has operated over a year without any complaints or issues.

No Added Cumulative Impact

Because the venue sells food only and is responsibly managed, there's no additional burden on public safety, noise, or disorder.

Unique Circumstances Support Licence

No alcohol, high hygiene standards, and unique cultural offerings create a case deserving an exemption from policy limitations.

Excellence in Hygiene and Authenticity

Nearby late-night venues fall short in comparison. Station Grill's 5-star hygiene rating and cultural menu make it a valuable outlier.

Concerns About Unfair Practices

It's troubling that older, less clean venues can stay open while new, cleaner ones like Station Grill face resistance. This suggests an informal curfew that doesn't reflect Brighton's values.

Signs of Unequal Treatment

The business next door at 61 Queens Road trades until 3:00 AM. Denying Station Grill the same chance—possibly due to the owner’s youth or shorter tenure—is unfair and potentially discriminatory.

Respect for Human Rights

The Licensing Policy mentions the Human Rights Act 1998:

Article 1 protects the peaceful use of property, including running a business.

Refusing this licence could violate those rights when an adjacent business operates longer under similar conditions.

Every Business Deserves a Fair Shot

Owners of all ages and durations should be assessed fairly. Station Grill’s safety, professionalism, and service merit an equal chance to trade.

Resident Needs and Equal Access

As locals, we want more late-night food options—not just old establishments. Blocking new licences shrinks our choices and benefits only older businesses.

This bias disadvantages newer, younger owners—preventing them from accessing opportunities open to others in the past. Station Grill at 62 Queens Road deserves the same late-night rights granted to 61 Queens Road.

Economic Justice and Community Value

All legitimate businesses should compete under equal conditions. Station Grill’s fairness case also aligns with human rights and community interest.

Community Demand is Unmet

The lack of late-night healthy options, especially Egyptian/Turkish food, is deeply felt. Station Grill would fill this gap.

Final Request

Based on all the above, I kindly ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence.

Final Words

Station Grill contributes significantly to Brighton's nightlife. It is secure, unique, responsible, and addresses an unmet need. I respectfully urge approval of this licence.

Signed:

Date: /07/2025

S16

From: REDACTED

Sent: 06 July 2025 01:17

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>;
bahaa.azmy1@yahoo.com

Subject: Declaration in Support of Late Night Refreshment Licence Request

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My Name: REDACTED

Address:- REDACTED

Declaration in Support of Late Night Refreshment Licence Request

Business Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Addressed to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

I am a loyal visitor to Station Grill, located at 62 Queens Road, Brighton, and I'm writing this declaration to fully support their application for a Late Night Refreshment Licence (excluding alcohol).

Responsible Management and Alignment with Licensing Objectives

Being a consistent customer, I have personally observed how professionally Station Grill is operated. The staff are courteous, efficient, and always maintain a safe and

sanitary environment. The manager, who I've learned holds an SIA door supervisor licence, creates a calm, secure setting and effectively upholds the four licensing objectives with practices such as cleanliness, friendly service, transparent communication, and quick issue resolution.

Uncommon and Valuable Culinary Offering

Station Grill offers a rare and appealing mix of Egyptian and Turkish cuisine—something not found anywhere else in Brighton, particularly at late hours. The food is prepared fresh and is known for its authenticity and delicious flavour. This unique menu contributes positively to the cultural diversity of the city's dining options.

Clear Need for After-Hours Dining

As someone who regularly seeks food late at night, I often face challenges finding quality options. Station Grill already serves as a dependable source of fresh meals for students, NHS personnel, night-shift staff, and security professionals. Granting them extended hours would provide meaningful benefit to many community members.

Central and Highly Trafficked Location

Queens Road serves as a busy connector between Brighton Station and the town centre. I frequently see people passing by in the late hours who would benefit from having access to a clean, alcohol-free location like Station Grill for food.

Cleanliness and Safety, Even Within the CIZ

Despite being in a designated Cumulative Impact Zone (CIZ), Station Grill consistently provides a secure and well-regulated setting. With trained staff and high hygiene standards, the business represents a responsible exception that should be allowed under CIZ rules.

Planning Not a Barrier

It's my understanding that this situation strictly concerns licensing and does not require additional planning permission for late-night takeaway or delivery of hot food. This should not be a reason to deny the licence.

Licensing Matrix Considerations

The Council's matrix already permits restaurants to remain open until midnight. Since Station Grill does not serve alcohol and operates responsibly, extending its hours within regulatory control makes perfect sense.

No Association with Crime or Disorder

Local reports and general discussions suggest that most late-night disturbances in the area stem from alcohol-serving venues. Station Grill, which is alcohol-free, has never been linked to any such issues.

Proven and Competent Management

The manager brings experience from working in the late-night food sector, particularly along West Street. Since the restaurant opened, no incidents have occurred, confirming the team's ability to manage extended operations responsibly.

No Adverse Impact on Local Area

Extending Station Grill's operating hours would not negatively affect the neighbourhood. In fact, having a clean, well-managed, alcohol-free establishment open later could help prevent disturbances by offering a peaceful dining space.

Exceptional Case Justifying an Exemption

With its original food offering, community support, superior hygiene, and strong management, Station Grill stands out as a special case deserving consideration even within the CIZ framework.

Hygiene and Food Quality Surpass Nearby Options

Local alternatives do not maintain the same hygiene or quality. The closest late-night venue holds only a 3-star rating, whereas Station Grill has a 5-star hygiene score and is the only takeaway nearby to offer Egyptian dishes, reinforcing their case.

Commitment to the Four Licensing Objectives

The manager of Station Grill takes his role seriously and actively promotes all four licensing aims:

A. Crime and Disorder Prevention:

There's CCTV covering both internal and external areas. A log of any incidents is kept. The manager is an SIA licence holder who is capable of managing safety and crowds effectively.

B. Ensuring Public Safety:

All fire and health standards are followed. The venue has clear signs and safe routes for entry and exit.

C. Avoiding Public Nuisance:

Noise is controlled by managing entry, daily waste removal is enforced, and customers are encouraged to leave respectfully.

D. Protection of Children from Harm:

Staff receive training to:

Recognise vulnerability due to intoxication, age, or drug use

Apply policies for managing such situations

Keep full training records

Share documentation with Sussex Police and local officials when needed

Receive verbal refresher training at intervals of no more than 8 weeks

Unique Menu and Cultural Contribution

Station Grill is the only takeaway in Brighton offering freshly prepared Egyptian-Turkish food for takeaway or delivery during late hours. This brings value to Brighton's nighttime food scene.

High Community Demand

Late-night food is in high demand—especially from students, NHS employees, shift workers, and commuters. Existing venues do not meet this demand adequately, and Station Grill fills that gap.

Prime Location with Strong Footfall

Sussex Police have acknowledged the volume of foot traffic along Queens Road, particularly between Brighton Station and the city centre. Station Grill is ideally located to serve this demand.

CIZ Application Justified Due to Enhanced Measures

Although within the CIZ, Station Grill deserves an exception due to its safety-first model:

SIA-trained door supervisor available during late hours

Use of incident logs and effective waste management

No sale of alcohol, reducing potential risk

Planning Clarification

As a Class E(b) establishment, Station Grill is permitted to conduct takeaway and delivery without needing new planning permission, provided these services are secondary and not dominant.

Alignment with Local Licensing Matrix

Restaurants are allowed to open until midnight under the Matrix policy. Since Station Grill is alcohol-free, it's logical to permit them to stay open beyond midnight with safeguards in place.

Crime Data Misapplied

The area's crime issues are mostly connected to alcohol consumption. Station Grill does not sell alcohol and hasn't contributed to these problems, so it should not be penalised for unrelated crime statistics.

Experienced and Incident-Free Management

The current manager has managed late-night venues, including one on West Street, for over a year. Station Grill has not seen a single complaint, which confirms it is a reliable operation.

No Harmful Cumulative Impact

The business is focused purely on food, is well-managed, and maintains strict control—so it will not add to local disorder or nuisance.

This is an Exceptional Circumstance

Given their no-alcohol policy, spotless record, and unique offering, Station Grill qualifies as an exceptional case that warrants deviation from the standard licensing restrictions.

Outstanding Hygiene and Distinct Menu

Nearby food outlets fail to meet Station Grill's hygiene standards. Their 5-star Environmental Health score and Egyptian cuisine make them stand out.

Unjust Licensing Disparities

It's concerning that older venues with poorer hygiene continue to operate late while a newer, cleaner business like Station Grill is denied the same opportunity. This creates an unfair competitive environment.

Evidence of Unfair Treatment

It appears the neighbouring takeaway at 61 Queens Road has a licence until 3:00 AM, yet Station Grill is blocked from similar hours. This may be due to the age or experience of the owner, which should not be a factor in licensing decisions.

Human Rights and Policy Context

The Council's Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects individuals' rights to operate businesses without undue restriction. Denying Station Grill's licence despite meeting all standards may breach this right—especially when a neighbouring business operates later under similar conditions.

Equal Treatment for All Operators

Every operator, regardless of age or time in business, should receive equal treatment. Station Grill has fulfilled all expectations of safety and professionalism and should not be treated differently.

Community Deserves More Choice

As a local resident, I want more than just the old takeaway options. Denying new licences limits choice and supports long-established businesses over newer ones.

A clear example: 61 Queens Road is open until 3:00 AM. Station Grill at 62 Queens Road is not allowed the same, creating an unjust competitive barrier.

Equal Business Rights Are Essential

Every business that meets the rules should be given the same opportunities. Denying Station Grill equal trading rights contradicts fairness and may infringe on business rights.

A Needed Option for the Community

It is becoming harder to access quality food late at night—particularly Middle Eastern dishes. Station Grill addresses that gap and would greatly benefit the area.

Final Appeal

In light of all these arguments, I respectfully urge the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence. This establishment is clean, safe, culturally enriching, and truly needed in Brighton.

Closing Statement

Station Grill plays a vital role in Brighton's community. It is safe, original, expertly managed, and provides what other venues do not. I sincerely ask that you grant them this licence.

REDACTED

Date: 6/07/2025

S17

From: REDACTED

Sent: 08 July 2025 12:07

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Fwd: Late Night Restuarant opening

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Supportive Testimony for Late Night Refreshment Licence Application

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

As a loyal patron of Station Grill at 62 Queens Road, Brighton, I am submitting this statement in full support of their request for a Late Night Refreshment Licence (non-alcoholic).

Committed Management and Upholding Licensing Principles

Being a regular customer, I can personally confirm the high standard of management at Station Grill. Staff members are courteous and operate in a clean, secure, and welcoming setting. The manager, who I understand is SIA certified, effectively maintains a composed and well-regulated atmosphere. Their practices promote the four licensing objectives through actions like cleanliness, courteous service, effective communication, and fast problem resolution.

Distinctive and Culturally Rich Menu

Station Grill serves a rare mix of Egyptian and Turkish dishes, unavailable elsewhere in Brighton—especially late at night. The freshly cooked meals are notable for their authenticity and rich taste. This offering adds significant cultural depth to the city's food options.

Consistent Need for Late-Night Meals

Being someone who often seeks late-night food, I've found few dependable choices. Station Grill already supports night-shift workers, NHS employees, students, and security staff. Allowing them to stay open longer would benefit many in the area.

Excellent Location for Footfall

Queens Road, leading from Brighton Station to the town centre, is a busy and active location. Late-night foot traffic is common, and many people could benefit from a clean, alcohol-free food venue along that route.

Security, Safety, and Hygiene

Though located within the Cumulative Impact Zone (CIZ), Station Grill maintains a secure and hygienic environment. The trained team and cleanliness make this a responsible business that merits being treated as an exception to CIZ restrictions.

Licensing Only—No Planning Barriers

To my knowledge, this is purely a licensing issue, and no extra planning approval is necessary to sell hot takeaway food after midnight. This should not hinder the application's success.

Alignment with Matrix Policy

Brighton & Hove's Licensing Matrix permits restaurants to operate until midnight. Since Station Grill doesn't serve alcohol and already functions responsibly, an extended licence under strict control is reasonable.

No Connection to Crime or Disturbance

Conversations and reports show that most disturbances in the area stem from alcohol-related venues. Station Grill, which doesn't sell alcohol, has never been associated with any public nuisance or disorder.

Proven Experience and Responsible Oversight

The manager brings extensive experience from working in the late-night food industry, including West Street. Since opening, Station Grill has operated without incident, demonstrating it can responsibly manage late hours.

Positive Influence on the Area

This licence will not harm the local area. On the contrary, having a secure, well-run, alcohol-free establishment open late can help reduce late-night noise and disorder by offering a place to relax and eat.

Why This Case Deserves Consideration

Due to its distinct food, strong community support, hygiene, and operational responsibility, this case is exceptional and should be approved despite the CIZ designation.

Hygiene and Standards Surpass Competitors

The closest alternative late-night takeaway holds only a 3-star hygiene score, while Station Grill boasts a 5-star rating. No local rivals serve Egyptian cuisine either, making this venue a standout option.

Support for Licensing Objectives

Station Grill's manager is devoted to the four licensing principles:

A. Preventing Crime and Disorder: CCTV is set up covering key areas inside and out. All incidents are logged. As an SIA licence holder, the manager can control crowds and maintain public safety.

B. Ensuring Public Safety: The location follows fire and safety regulations with visible signs and safe access routes.

C. Avoiding Public Nuisance: Daily waste removal, minimal noise, and managed entry reduce disruption. Customers are encouraged to leave quietly.

D. Protecting Children from Harm: Staff receive training to:

Identify vulnerable individuals (due to age, intoxication, or drugs)

Handle conflict using a clear policy

Log and document all training sessions

Present training records to Sussex Police or regulatory bodies when asked

Participate in refresher training at least every 8 weeks with all sessions logged.

Unparalleled Food and Community Relevance

Station Grill is the only late-night provider of combined Egyptian and Turkish meals in Brighton. Their freshly prepared food for delivery and collection enriches Brighton's night economy.

Clear Local Demand

NHS staff, students, security workers, and late-night travellers create consistent demand for quality food. This need is not met by current offerings.

Location Suited for Service

Sussex Police recognise that Queens Road is a major route with heavy footfall from the train station. Station Grill is well-positioned to meet that demand.

CIZ Placement Offset by Safety Efforts

Though in the CIZ, the business is an exception due to proactive safety protocols:

A licensed SIA door supervisor on duty at night

Incident logging, cleanliness, and trained staff

No alcohol service, reducing potential issues

Planning Clarified

As a Class E(b) premises, the venue may offer delivery, takeaway, or collection without additional planning consent—as long as these remain secondary to the restaurant's primary function.

Matrix Policy Alignment

While the Matrix supports restaurants until midnight, Station Grill wants slightly extended hours—justified by its non-alcoholic nature and strong safeguards.

Crime Statistics Not Relevant

Area crime often links to alcohol. Since Station Grill sells only food, it hasn't contributed to any such incidents.

Qualified Management

The manager, an SIA licence holder, has worked in similar late-night roles before, including a kebab shop on West Street. Station Grill has operated over a year without any complaints or issues.

No Added Cumulative Impact

Because the venue sells food only and is responsibly managed, there's no additional burden on public safety, noise, or disorder.

Unique Circumstances Support Licence

No alcohol, high hygiene standards, and unique cultural offerings create a case deserving an exemption from policy limitations.

Excellence in Hygiene and Authenticity

Nearby late-night venues fall short in comparison. Station Grill's 5-star hygiene rating and cultural menu make it a valuable outlier.

Concerns About Unfair Practices

It's troubling that older, less clean venues can stay open while new, cleaner ones like Station Grill face resistance. This suggests an informal curfew that doesn't reflect Brighton's values.

Signs of Unequal Treatment

The business next door at 61 Queens Road trades until 3:00 AM. Denying Station Grill the same chance—possibly due to the owner's youth or shorter tenure—is unfair and potentially discriminatory.

Respect for Human Rights

The Licensing Policy mentions the Human Rights Act 1998:

Article 1 protects the peaceful use of property, including running a business.

Refusing this licence could violate those rights when an adjacent business operates longer under similar conditions.

Every Business Deserves a Fair Shot

Owners of all ages and durations should be assessed fairly. Station Grill's safety, professionalism, and service merit an equal chance to trade.

Resident Needs and Equal Access

As locals, we want more late-night food options—not just old establishments. Blocking new licences shrinks our choices and benefits only older businesses.

This bias disadvantages newer, younger owners—preventing them from accessing opportunities open to others in the past. Station Grill at 62 Queens Road deserves the same late-night rights granted to 61 Queens Road.

Economic Justice and Community Value

All legitimate businesses should compete under equal conditions. Station Grill's fairness case also aligns with human rights and community interest.

Community Demand is Unmet

The lack of late-night healthy options, especially Egyptian/Turkish food, is deeply felt. Station Grill would fill this gap.

Final Request

Based on all the above, I kindly ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence.

Final Words

Station Grill contributes significantly to Brighton's nightlife. It is secure, unique, responsible, and addresses an unmet need. I respectfully urge approval of this licence.

Signed:

Date: 5/07/2025

S18

From: REDACTED

Sent: 08 July 2025 11:05

To: EHL Licensing REDACTED

Subject: Station grill restaurant

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My name is REDACTED

Address: REDACTED

Supportive Testimony for Late Night Refreshment Licence Application

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

As a loyal patron of Station Grill at 62 Queens Road, Brighton, I am submitting this statement in full support of their request for a Late Night Refreshment Licence (non-alcoholic).

Committed Management and Upholding Licensing Principles

Being a regular customer, I can personally confirm the high standard of management at Station Grill. Staff members are courteous and operate in a clean, secure, and welcoming setting. The manager, who I understand is SIA certified, effectively maintains a composed and well-regulated atmosphere. Their practices promote the four licensing objectives through actions like cleanliness, courteous service, effective communication, and fast problem resolution.

Distinctive and Culturally Rich Menu

Station Grill serves a rare mix of Egyptian and Turkish dishes, unavailable elsewhere in Brighton—especially late at night. The freshly cooked meals are notable for their authenticity and rich taste. This offering adds significant cultural depth to the city's food options.

Consistent Need for Late-Night Meals

Being someone who often seeks late-night food, I've found few dependable choices. Station Grill already supports night-shift workers, NHS employees, students, and security staff. Allowing them to stay open longer would benefit many in the area.

Excellent Location for Footfall

Queens Road, leading from Brighton Station to the town centre, is a busy and active location. Late-night foot traffic is common, and many people could benefit from a clean, alcohol-free food venue along that route.

Security, Safety, and Hygiene

Though located within the Cumulative Impact Zone (CIZ), Station Grill maintains a secure and hygienic environment. The trained team and cleanliness make this a responsible business that merits being treated as an exception to CIZ restrictions.

Licensing Only—No Planning Barriers

To my knowledge, this is purely a licensing issue, and no extra planning approval is necessary to sell hot takeaway food after midnight. This should not hinder the application's success.

Alignment with Matrix Policy

Brighton & Hove's Licensing Matrix permits restaurants to operate until midnight. Since Station Grill doesn't serve alcohol and already functions responsibly, an extended licence under strict control is reasonable.

No Connection to Crime or Disturbance

Conversations and reports show that most disturbances in the area stem from alcohol-related venues. Station Grill, which doesn't sell alcohol, has never been associated with any public nuisance or disorder.

Proven Experience and Responsible Oversight

The manager brings extensive experience from working in the late-night food industry, including West Street. Since opening, Station Grill has operated without incident, demonstrating it can responsibly manage late hours.

Positive Influence on the Area

This licence will not harm the local area. On the contrary, having a secure, well-run, alcohol-free establishment open late can help reduce late-night noise and disorder by offering a place to relax and eat.

Why This Case Deserves Consideration

Due to its distinct food, strong community support, hygiene, and operational responsibility, this case is exceptional and should be approved despite the CIZ designation.

Hygiene and Standards Surpass Competitors

The closest alternative late-night takeaway holds only a 3-star hygiene score, while Station Grill boasts a 5-star rating. No local rivals serve Egyptian cuisine either, making this venue a standout option.

Support for Licensing Objectives

Station Grill's manager is devoted to the four licensing principles:

A. Preventing Crime and Disorder: CCTV is set up covering key areas inside and out. All incidents are logged. As an SIA licence holder, the manager can control crowds and maintain public safety.

B. Ensuring Public Safety: The location follows fire and safety regulations with visible signs and safe access routes.

C. Avoiding Public Nuisance: Daily waste removal, minimal noise, and managed entry reduce disruption. Customers are encouraged to leave quietly.

D. Protecting Children from Harm: Staff receive training to:

Identify vulnerable individuals (due to age, intoxication, or drugs)

Handle conflict using a clear policy

Log and document all training sessions

Present training records to Sussex Police or regulatory bodies when asked

Participate in refresher training at least every 8 weeks with all sessions logged.

Unparalleled Food and Community Relevance

Station Grill is the only late-night provider of combined Egyptian and Turkish meals in Brighton. Their freshly prepared food for delivery and collection enriches Brighton's night economy.

Clear Local Demand

NHS staff, students, security workers, and late-night travellers create consistent demand for quality food. This need is not met by current offerings.

Location Suited for Service

Sussex Police recognise that Queens Road is a major route with heavy footfall from the train station. Station Grill is well-positioned to meet that demand.

CIZ Placement Offset by Safety Efforts

Though in the CIZ, the business is an exception due to proactive safety protocols:

A licensed SIA door supervisor on duty at night

Incident logging, cleanliness, and trained staff

No alcohol service, reducing potential issues

Planning Clarified

As a Class E(b) premises, the venue may offer delivery, takeaway, or collection without additional planning consent—as long as these remain secondary to the restaurant's primary function.

Matrix Policy Alignment

While the Matrix supports restaurants until midnight, Station Grill wants slightly extended hours—justified by its non-alcoholic nature and strong safeguards.

Crime Statistics Not Relevant

Area crime often links to alcohol. Since Station Grill sells only food, it hasn't contributed to any such incidents.

Qualified Management

The manager, an SIA licence holder, has worked in similar late-night roles before, including a kebab shop on West Street. Station Grill has operated over a year without any complaints or issues.

No Added Cumulative Impact

Because the venue sells food only and is responsibly managed, there's no additional burden on public safety, noise, or disorder.

Unique Circumstances Support Licence

No alcohol, high hygiene standards, and unique cultural offerings create a case deserving an exemption from policy limitations.

Excellence in Hygiene and Authenticity

Nearby late-night venues fall short in comparison. Station Grill's 5-star hygiene rating and cultural menu make it a valuable outlier.

Concerns About Unfair Practices

It's troubling that older, less clean venues can stay open while new, cleaner ones like Station Grill face resistance. This suggests an informal curfew that doesn't reflect Brighton's values.

Signs of Unequal Treatment

The business next door at 61 Queens Road trades until 3:00 AM. Denying Station Grill the same chance—possibly due to the owner's youth or shorter tenure—is unfair and potentially discriminatory.

Respect for Human Rights

The Licensing Policy mentions the Human Rights Act 1998:

Article 1 protects the peaceful use of property, including running a business.

Refusing this licence could violate those rights when an adjacent business operates longer under similar conditions.

Every Business Deserves a Fair Shot

Owners of all ages and durations should be assessed fairly. Station Grill's safety, professionalism, and service merit an equal chance to trade.

Resident Needs and Equal Access

As locals, we want more late-night food options—not just old establishments. Blocking new licences shrinks our choices and benefits only older businesses.

This bias disadvantages newer, younger owners—preventing them from accessing opportunities open to others in the past. Station Grill at 62 Queens Road deserves the same late-night rights granted to 61 Queens Road.

Economic Justice and Community Value

All legitimate businesses should compete under equal conditions. Station Grill's fairness case also aligns with human rights and community interest.

Community Demand is Unmet

The lack of late-night healthy options, especially Egyptian/Turkish food, is deeply felt. Station Grill would fill this gap.

Final Request

Based on all the above, I kindly ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence.

Final Words

Station Grill contributes significantly to Brighton's nightlife. It is secure, unique, responsible, and addresses an unmet need. I respectfully urge approval of this licence.

Signed: REDACTED

Date: 03 /07/2025

S19

From: REDACTED

Sent: 08 July 2025 11:08

To: REDACTED

Subject: Support Station grill restaurant

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Name: REDACTED

Address: REDACTED

Statement of Support for a Late Night Refreshment Licence Application

Location: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a frequent patron of Station Grill, situated at 62 Queens Road, Brighton, and I wish to present this statement in strong support of their application for a Late Night Refreshment Licence (excluding alcohol).

Exemplary Management and Adherence to Licensing Principles

Visiting often, I've come to appreciate how efficiently Station Grill is operated. The staff are respectful, attentive, and ensure a consistently safe and clean space. The manager, who is also an SIA-accredited door supervisor, handles operations calmly and effectively. I've seen him demonstrate all four licensing objectives through everyday actions like maintaining hygiene, respectful service, clear communication, and fast handling of concerns.

Distinct Menu with Cultural Significance

Station Grill offers a distinctive fusion of Turkish and Egyptian dishes that can't be found elsewhere in Brighton, especially late at night. Their food is freshly prepared and stands out for its genuine flavour and quality. This unique offering enhances the cultural diversity of Brighton's food scene.

Clear Need for Late-Night Dining

As someone who's regularly out late, I struggle to find hot, tasty food past a certain hour. Station Grill has become a crucial source for many, especially NHS workers, students, and night-shift personnel. Allowing them to extend their hours would benefit a wide swathe of the local population.

Prime Location and Accessibility

Queens Road is a key thoroughfare between Brighton Station and the city centre. Late at night, I see many people passing through who would value a safe, alcohol-free place for food. Station Grill is ideally positioned to meet that demand.

Safety and Hygiene in the CIZ

Even though Station Grill falls within the Cumulative Impact Zone (CIZ), it remains a model of safety and sanitation. The team's training and focus on controlled service make it an example of a responsible venue. Their practices warrant making an exception to the CIZ policy.

Licensing, Not Planning

From what I understand, this is solely a licensing matter, and planning consent isn't required for late-night takeaway or delivery of hot food. This point should not serve as a reason to reject the licence.

Matrix Policy Consideration

Brighton's matrix already allows restaurants to open until midnight. Since Station Grill doesn't serve alcohol and already runs responsibly, it would be fair and logical to permit them to operate later with conditions in place.

No Connection to Crime or Anti-Social Behaviour

Based on reports and discussions, late-night disturbances are largely tied to alcohol. Food-only outlets like Station Grill are not linked to such behaviour. I've never seen trouble there.

Experienced, Trustworthy Management

The manager has ample experience working in the night-time food industry, including at venues on West Street. Since Station Grill opened, it has operated without incident, showing it can manage extended hours safely and effectively.

Positive Impact on the Community

Allowing Station Grill to serve later would not disturb the area. In fact, having a well-managed, clean venue open late could actually reduce disorder by giving people a peaceful place to eat.

Exceptional Grounds for Granting Licence

Given their distinctive menu, community backing, top-tier hygiene, and responsible operation, this application deserves to be treated as an exception under the CIZ policy.

Superior Hygiene and Standards Compared to Others

Other nearby takeaways typically lack Station Grill's cleanliness. The nearest one has only a 3-star rating, while Station Grill holds a 5-star hygiene score and is the only venue locally to serve Egyptian food—strengthening the case for this licence.

Support of Licensing Objectives

The manager of Station Grill shows strong commitment to the four licensing goals:

A. Crime and Disorder Prevention:

There's CCTV throughout the venue, and incident logs are maintained. The SIA-trained manager can handle crowds effectively and keep the premises secure.

B. Public Safety:

The site is compliant with all fire and health regulations, with well-marked signage and safe access.

C. Minimising Public Nuisance:

Waste is collected daily. Entry is controlled to reduce noise, and customers are guided to leave quietly.

D. Child Protection:

All staff undergo training to:

Spot vulnerable individuals (due to intoxication, age, or other factors)

Apply conflict-resolution policies

Keep training fully documented and up to date

Provide records to Sussex Police or Trading Standards when asked

Attend follow-up training sessions no less than every 8 weeks

Exclusive Menu and Cultural Contribution

Station Grill is the only late-night outlet in Brighton offering this unique Egyptian and Turkish food combination. Their fresh, takeaway-ready menu adds value to the city's after-hours food landscape.

Public Demand is Undeniable

There's a notable need for late-night hot food, especially from those working unconventional hours. Current venues don't sufficiently meet this demand, making Station Grill essential.

Location and Foot Traffic

Queens Road is one of the busiest streets in Brighton, and the police acknowledge its late-night activity. Station Grill is ideally situated to serve the flow of people during these hours.

CIZ Exception Based on Responsible Operation

While the CIZ policy exists for a reason, this venue is clearly different:

An SIA-accredited security supervisor is always present at night

Logs, waste management, and training plans are in place

No alcohol is sold—significantly lowering the risk of disorder

Clarifying Planning Permissions

This application pertains to licensing alone. Class E(b) premises, like Station Grill, are legally allowed to offer takeaway and delivery without extra planning permission, as long as these functions are secondary.

Alignment with Licensing Matrix

Brighton & Hove's framework supports restaurants until midnight. Because Station Grill doesn't serve alcohol, their request for modestly longer hours—under supervision—is perfectly justifiable.

Irrelevance of Local Crime Statistics

Crime figures in the area mostly relate to alcohol. Since Station Grill doesn't serve alcohol and hasn't caused any issues, it's unfair to apply those stats to them.

Proven Managerial Skill

With more than a year's experience managing late-night food outlets, including one on West Street, the current manager has kept Station Grill incident-free—proving responsible leadership.

No Accumulative Disruption

The business is responsibly run and exclusively food-based. There is no negative contribution to public nuisance, crime, or disorder.

A Unique Case that Deserves Approval

No alcohol, clean history, high public demand, and cultural relevance—this is a clear case that merits an exception to policy norms.

Excellence in Food Safety

Nearby competitors lack Station Grill's standards. They've been awarded 5 stars by Environmental Health, and they offer cuisine not found in other Brighton takeaways.

Unequal Licensing Practices

It seems newer, safer outlets are being limited while older, less sanitary ones remain open. This creates a system where consumers are stuck with fewer, lower-quality options.

Biased Treatment Between Operators

It's wrong that the neighbouring business at 61 Queens Road can operate until 3:00 AM, while Station Grill is denied the same. Experience or age of ownership shouldn't result in such imbalance.

Human Rights Framework

The Licensing Policy acknowledges the Human Rights Act 1998:

Article 1 ensures the right to operate a lawful business without unjust restriction. Denying Station Grill's application, while allowing its neighbour to stay open, undermines these rights.

Equal Treatment for Business Owners

All businesses, new or old, should receive fair treatment. Station Grill meets all licensing criteria and deserves the opportunity to operate like any other compliant venue.

Residents Need More Choice

We, the local residents, should not be limited to old late-night venues. We need variety, and blocking new licences harms our options and favours long-standing outlets.

The takeaway next door at 61 Queens Road already trades until 3:00 AM. Refusing Station Grill creates an unfair disadvantage and limits diversity in food offerings.

Access to Fair Business Conditions

All legitimate businesses should have equal access to licensing rights. Station Grill's exclusion from extended hours goes against principles of fairness and equal opportunity.

A Vital Service to the Community

It's become harder to find late-night fresh food—particularly Egyptian and Turkish options. Station Grill meets this demand and would be a vital addition to the area.

Closing Remarks

Given the points outlined above, I respectfully request the Licensing Authority, Sussex Police, and the Court to approve Station Grill's application for a Late Night Refreshment Licence. Their commitment to safe, clean, and diverse service during late hours serves the entire community.

Final Statement

Station Grill is a key player in Brighton's night economy—safe, unique, and essential. I respectfully urge approval of their licence.

Signed: REDACTED

Date: 08/07/2025

Dear REDACTED ,

Could you please send your supportig email directly to the licensing team, with your full name and address so they can validate it.

Kind Regards

Mobile& Whats App : REDACTED

S20

From: REDACTED

Sent: 02 July 2025 20:07

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Support for Station Grill's Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Dear Licensing Team, Sussex Police Licensing, and Honorable Members of the Court,

I hope this message finds you well.

I'm writing to express my full support for the Late Night Refreshment Licence application submitted by *Station Grill*, located at 62 Queens Road, Brighton (BN1 3XD). As a regular customer, I've had consistently positive experiences with the venue and would like to highlight why I believe their application deserves approval.

Responsible and Professional Operation

The team at Station Grill consistently demonstrates excellent management and customer service. The premises are always clean, the staff are polite and respectful, and the atmosphere feels calm and welcoming. The manager, who I understand is a

licensed SIA door supervisor, is especially attentive to customer safety and overall order.

Unique and Valuable Food Offering

Station Grill offers a rare and much-appreciated combination of Egyptian and Turkish cuisine, freshly prepared and not easily found elsewhere in Brighton—especially late at night. The quality, authenticity, and taste truly stand out.

Meeting a Clear Community Need

There's a real demand in the area for clean, hot food late at night—especially from students, NHS staff, night-shift workers, and security professionals. Station Grill is already a trusted spot, and extending their hours would directly benefit the local community.

Safe and Suitable Location

Queens Road is a major route between Brighton Station and the city centre, with steady footfall into the late hours. Having a safe, alcohol-free venue like Station Grill open during those times provides people with a valuable option for food without relying on alcohol-serving venues.

Security, Cleanliness, and Licensing Objectives

Despite being in the Cumulative Impact Zone (CIZ), Station Grill upholds high standards:

- 5-star food hygiene rating
- On-site CCTV and incident logging
- Daily waste management and clear entry/exit control
- No alcohol served on the premises
- Staff training on safety, conflict management, and identifying vulnerable individuals

These efforts clearly support the four licensing objectives and demonstrate a commitment to operating responsibly.

Clarification on Planning and Matrix Policy

To my understanding, planning permission is not required to serve hot food for takeaway or delivery after midnight, which makes this purely a licensing matter. The Council's matrix policy already supports late-night food venues up to midnight, and Station Grill's responsible management justifies extending those hours.

Fairness and Equal Opportunity

It's important that new businesses are given the same opportunities as older ones. Station Grill's neighbour at 61 Queens Road is licensed until 3:00 am, yet Station Grill—despite its spotless record and high standards—has not been granted the

same. This disparity feels unfair and potentially discriminatory, especially when both businesses operate in similar conditions.

Denying Station Grill's application while allowing others to remain open late only limits public choice and could be seen as a barrier to fair competition, particularly for newer entrepreneurs.

Final Thoughts

Station Grill has proven itself as a safe, clean, well-run and culturally enriching part of Brighton's night-time economy. With no history of complaints or disorder, and growing public support, I believe their application clearly meets the criteria for an exception to the CIZ policy.

I sincerely hope you will give this application your full and fair consideration, based on its individual merits and in light of the responsible operation and strong demand for this type of venue.

Kind regards,

REDACTED

REDACTED

S21

From: REDACTED

Sent: 09 July 2025 00:21

To: REDACTED

Subject: Station Grill, Support of Late Night Refreshment Licence

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My

Name: REDACTED

Address: REDACTED

Declaration in Support of Late Night Refreshment Licence Request

Business Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Addressed to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

I am a loyal visitor to Station Grill, located at 62 Queens Road, Brighton, and I'm writing this declaration to fully support their application for a Late Night Refreshment Licence (excluding alcohol).

Responsible Management and Alignment with Licensing Objectives

Being a consistent customer, I have personally observed how professionally Station Grill is operated. The staff are courteous, efficient, and always maintain a safe and sanitary environment. The manager, who I've learned holds an SIA door supervisor licence, creates a calm, secure setting and effectively upholds the four licensing objectives with practices such as cleanliness, friendly service, transparent communication, and quick issue resolution.

Uncommon and Valuable Culinary Offering

Station Grill offers a rare and appealing mix of Egyptian and Turkish cuisine—something not found anywhere else in Brighton, particularly at late hours. The food is prepared fresh and is known for its authenticity and delicious flavour. This unique menu contributes positively to the cultural diversity of the city's dining options.

Clear Need for After-Hours Dining

As someone who regularly seeks food late at night, I often face challenges finding quality options. Station Grill already serves as a dependable source of fresh meals for students, NHS personnel, night-shift staff, and security professionals. Granting them extended hours would provide meaningful benefit to many community members.

Central and Highly Trafficked Location

Queens Road serves as a busy connector between Brighton Station and the town centre. I frequently see people passing by in the late hours who would benefit from having access to a clean, alcohol-free location like Station Grill for food.

Cleanliness and Safety, Even Within the CIZ

Despite being in a designated Cumulative Impact Zone (CIZ), Station Grill consistently provides a secure and well-regulated setting. With trained staff and high hygiene standards, the business represents a responsible exception that should be allowed under CIZ rules.

Planning Not a Barrier

It's my understanding that this situation strictly concerns licensing and does not require additional planning permission for late-night takeaway or delivery of hot food. This should not be a reason to deny the licence.

Licensing Matrix Considerations

The Council's matrix already permits restaurants to remain open until midnight. Since Station Grill does not serve alcohol and operates responsibly, extending its hours within regulatory control makes perfect sense.

No Association with Crime or Disorder

Local reports and general discussions suggest that most late-night disturbances in the area stem from alcohol-serving venues. Station Grill, which is alcohol-free, has never been linked to any such issues.

Proven and Competent Management

The manager brings experience from working in the late-night food sector, particularly along West Street. Since the restaurant opened, no incidents have occurred, confirming the team's ability to manage extended operations responsibly.

No Adverse Impact on Local Area

Extending Station Grill's operating hours would not negatively affect the neighbourhood. In fact, having a clean, well-managed, alcohol-free establishment open later could help prevent disturbances by offering a peaceful dining space.

Exceptional Case Justifying an Exemption

as per SoLP

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, **a small restaurant**, theatre or live music venue (**where alcohol is not the primary activity**) may be considered exceptional circumstances.

With its original food offering, community support, superior hygiene, and strong management, Station Grill stands out as a special case deserving consideration even within the CIZ framework.

Hygiene and Food Quality Surpass Nearby Options

Local alternatives do not maintain the same hygiene or quality. The closest late-night venue holds only a 3-star rating, whereas Station Grill has a 5-star hygiene score and is the only takeaway nearby to offer Egyptian dishes, reinforcing their case.

Commitment to the Four Licensing Objectives

The manager of Station Grill takes his role seriously and actively promotes all four licensing aims:

A. Crime and Disorder Prevention:

There's CCTV covering both internal and external areas. A log of any incidents is kept. The manager is an SIA licence holder who is capable of managing safety and crowds effectively.

B. Ensuring Public Safety:

All fire and health standards are followed. The venue has clear signs and safe routes for entry and exit.

C. Avoiding Public Nuisance:

Noise is controlled by managing entry, daily waste removal is enforced, and customers are encouraged to leave respectfully.

D. Protection of Children from Harm:

Staff receive training to:

- Recognise vulnerability due to intoxication, age, or drug use
- Apply policies for managing such situations
- Keep full training records
- Share documentation with Sussex Police and local officials when needed
- Receive verbal refresher training at intervals of no more than 8 weeks

Unique Menu and Cultural Contribution

Station Grill is the only takeaway in Brighton offering freshly prepared Egyptian-Turkish food for takeaway or delivery during late hours. This brings value to Brighton's nighttime food scene.

High Community Demand

Late-night food is in high demand—especially from students, NHS employees, shift workers, and commuters. Existing venues do not meet this demand adequately, and Station Grill fills that gap.

Prime Location with Strong Footfall

Sussex Police have acknowledged the volume of foot traffic along Queens Road, particularly between Brighton Station and the city centre. Station Grill is ideally located to serve this demand.

CIZ Application Justified Due to Enhanced Measures

Although within the CIZ, Station Grill deserves an exception due to its safety-first model:

- SIA-trained door supervisor available during late hours
- Use of incident logs and effective waste management
- No sale of alcohol, reducing potential risk

Planning Clarification

As a Class E(b) establishment, Station Grill is permitted to conduct takeaway and delivery without needing new planning permission, provided these services are secondary and not dominant.

Alignment with Local Licensing Matrix

Restaurants are allowed to open until midnight under the Matrix policy. Since Station Grill is alcohol-free, it's logical to permit them to stay open beyond midnight with safeguards in place.

Crime Data Misapplied

The area's crime issues are mostly connected to alcohol consumption. Station Grill does not sell alcohol and hasn't contributed to these problems, so it should not be penalised for unrelated crime statistics.

Experienced and Incident-Free Management

The current manager has managed late-night venues, including one on West Street, for over a year. Station Grill has not seen a single complaint, which confirms it is a reliable operation.

No Harmful Cumulative Impact

The business is focused purely on food, is well-managed, and maintains strict control—so it will not add to local disorder or nuisance.

This is an Exceptional Circumstance

Given their no-alcohol policy, spotless record, and unique offering, Station Grill qualifies as an exceptional case that warrants deviation from the standard licensing restrictions.

Outstanding Hygiene and Distinct Menu

Nearby food outlets fail to meet Station Grill's hygiene standards. Their 5-star Environmental Health score and Egyptian cuisine make them stand out.

Unjust Licensing Disparities

It's concerning that older venues with poorer hygiene continue to operate late while a newer, cleaner business like Station Grill is denied the same opportunity. This creates an unfair competitive environment.

Evidence of Unfair Treatment

It appears the neighbouring takeaway at 61 Queens Road has a licence until 3:00 AM, yet Station Grill is blocked from similar hours. This may be due to the age or experience of the owner, which should not be a factor in licensing decisions.

Human Rights and Policy Context

The Council's Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects individuals' rights to operate businesses without undue restriction. Denying Station Grill's licence despite meeting all standards may breach this right—especially when a neighbouring business operates later under similar conditions.

Equal Treatment for All Operators

Every operator, regardless of age or time in business, should receive equal treatment. Station Grill has fulfilled all expectations of safety and professionalism and should not be treated differently.

Community Deserves More Choice

As a local resident, I want more than just the old takeaway options. Denying new licences limits choice and supports long-established businesses over newer ones.

A clear example: 61 Queens Road is open until 3:00 AM. Station Grill at 62 Queens Road is not allowed the same, creating an unjust competitive barrier.

Equal Business Rights Are Essential

Every business that meets the rules should be given the same opportunities. Denying Station Grill equal trading rights contradicts fairness and may infringe on business rights.

A Needed Option for the Community

It is becoming harder to access quality food late at night—particularly Middle Eastern dishes. Station Grill addresses that gap and would greatly benefit the area.

Final Appeal

In light of all these arguments, I respectfully urge the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence. This establishment is clean, safe, culturally enriching, and truly needed in Brighton.

Closing Statement

Station Grill plays a vital role in Brighton's community. It is safe, original, expertly managed, and provides what other venues do not. I sincerely ask that you grant them this licence.

Signed:

Date: 08 /07/2025

S22

From: REDACTED

Sent: 09 July 2025 00:36

To: REDACTED

Subject: Station Grill, Support of Late Night Refreshment Licence

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

my

Name: REDACTED

Address: REDACTED

Support Letter for Late Night Refreshment Licence Application

Establishment: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

As a regular customer of Station Grill, located at 62 Queens Road in Brighton, I'm writing this letter to fully endorse their application for a Late Night Refreshment Licence (non-alcoholic).

Responsible Business Practices and Licensing Objectives

As someone who visits Station Grill frequently, I've personally observed its strong management. The staff are courteous and efficient, and the premises are consistently clean and secure. The manager, who holds an SIA door supervisor licence, ensures a calm and well-ordered atmosphere. I've seen him promote all four licensing objectives through actions such as good hygiene, customer respect, effective communication, and rapid response to any concerns.

Unique Food Offering with Cultural Significance

Station Grill provides a combination of Egyptian and Turkish dishes not available elsewhere in Brighton—especially not late at night. The meals are freshly cooked, authentic, and full of flavour. This unique menu brings diversity and richness to the city's culinary landscape.

High Need for Late-Night Refreshment

As someone who works or travels late, I often find it difficult to access freshly prepared, high-quality food. Station Grill already serves night-shift workers, NHS staff, security personnel, and students. Extending their operating hours would be of great value to many in the community.

Central and Well-Frequented Location

Queens Road is one of Brighton's busiest streets, linking the train station with the city centre. I regularly see many people walking this route late at night, and they would benefit from a clean, safe food establishment that doesn't rely on alcohol.

Safe Operation in a Cumulative Impact Zone

Even though the restaurant is located in the ClZ, it maintains a strong sense of safety and responsibility. The staff are trained, service is controlled, and the environment is hygienic. I believe these factors justify treating Station Grill as an exception to ClZ restrictions.

Planning Permission Not Required

As far as I know, this matter concerns only licensing. Serving hot food for takeaway or delivery after midnight does not need planning permission, so this shouldn't stand in the way of granting the licence.

In Line with Licensing Matrix

The Brighton & Hove Licensing Matrix supports restaurant operation until midnight. Since Station Grill is a food-only business that already functions responsibly, I believe they should be permitted to stay open later under the right conditions.

No Link to Crime or Public Nuisance

From both local discussions and media reports, I understand that most late-night disturbances in the area are connected to alcohol-serving venues. As a food-only premises, Station Grill has never been involved in any such problems.

Skilled and Reliable Management

The manager of Station Grill has worked in the late-night food industry, including time spent on West Street. In all the time Station Grill has been open, there have been no complaints or incidents. This proves their ability to handle extended hours safely.

Community-Friendly Operation

Granting this licence will not negatively affect the neighbourhood. In fact, a clean, calm, alcohol-free restaurant operating late could help reduce local disturbances by giving people a positive place to gather.

Why This Licence is Justified

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Because of its exclusive menu, widespread local support, top hygiene ratings, and responsible operation, I believe Station Grill should be seen as an exceptional case deserving an exemption from the CIZ rules.

Superior Hygiene and Service Compared to Others

The nearest similar takeaway has only a 3-star hygiene rating and doesn't match Station Grill in quality or cleanliness. Station Grill has a 5-star hygiene score and is the only nearby outlet serving Egyptian cuisine—further proving their value.

Supporting the Four Licensing Objectives

The Station Grill manager is strongly committed to meeting all licensing goals:

A. Preventing Crime and Disorder:

CCTV covers all major internal and external areas. All incidents are logged. As an SIA door supervisor, the manager is trained to handle security and crowd control effectively.

B. Public Safety:

The premises meet all fire and safety codes. Clear signs and accessible exit routes are in place.

C. Reducing Public Nuisance:

Daily waste disposal is practiced, noise is controlled, and customers are guided to leave quietly.

D. Protecting Children from Harm:

Staff are trained to:

- Identify vulnerable individuals (e.g., intoxicated persons or minors)
- Handle situations using a set conflict management policy
- Maintain full documentation of all training
- Provide records upon request to the police or council officers
- Participate in refresher sessions at least every 8 weeks

A Standalone Offering in Brighton

No other late-night takeaway in Brighton offers this particular Egyptian and Turkish cuisine. The food is freshly made and available for delivery and takeaway, making Station Grill a unique contributor to Brighton's night economy.

Clear Local Demand

There is substantial need for hot food late at night, especially from students, NHS employees, shift workers, and commuters. Few venues meet this need, and Station Grill addresses that gap.

Ideal Position for Public Service

Sussex Police have identified Queens Road as a highly trafficked area, especially after dark. Station Grill's location makes it perfectly placed to serve that demand.

CIZ Exception Based on Safety Measures

Although the business is within the CIZ, this application should be considered on its own merits due to the following:

- On-site SIA door supervisor during late hours
- Incident logs, controlled waste handling, and structured staff training
- Zero alcohol sales, meaning fewer risks

Planning Rules Already Met

This application is about licensing alone. As a Class E(b) premises, Station Grill can provide collection, takeaway, and delivery services without separate planning approval, as long as these remain minor elements of their core business.

Support from Matrix Guidelines

The Licensing Matrix already allows restaurants to open until midnight. Because Station Grill does not serve alcohol, it makes sense to permit them to operate slightly beyond that time—under careful supervision.

Crime Data Should Not Apply

The crime figures used in licensing decisions largely reflect issues caused by alcohol. Station Grill does not serve alcohol and should not be judged by unrelated statistics.

Proven Operational Experience

The current manager has worked in late-night food businesses, including one on West Street, and has managed Station Grill for over a year without incident. This record proves competence and control.

No Negative Impact on Licensing Objectives

The restaurant is food-only, responsibly run, and well-managed. It will not add to any cumulative issues related to crime, noise, or disorder.

A Truly Exceptional Case

Station Grill sells no alcohol, has an impeccable safety and hygiene record, and serves a clearly unmet need. These are all reasons the application deserves approval outside standard policy limits.

Hygiene and Food Quality Far Above Average

Nearby alternatives fall short in both cleanliness and food type. Station Grill's 5-star rating and unique Egyptian menu raise the bar for late-night dining options in the area.

Biased Restrictions Harm New Businesses

It seems that licensing policies are preventing new, cleaner businesses from operating late, while older venues with lesser standards are allowed to continue. This results in fewer options for the public and disadvantages responsible new operators.

Signs of Discrimination

The neighbouring premises at 61 Queens Road can trade until 3:00 AM. Station Grill at number 62 cannot. If the difference is based on how long they've operated or the owner's age, then that is neither fair nor justifiable. The manager of Station Grill is equally responsible and should be treated equally.

Human Rights Considerations

The Licensing Policy refers to the Human Rights Act 1998:

Article 1 of the First Protocol protects the right to run a lawful business without unjust limitations. Rejecting Station Grill's application—while allowing their next-door neighbour to operate—may breach this principle.

Fair Access for All Businesses

Business owners, whether new or established, should be judged by their actions and standards—not by arbitrary details like age or how long they've been open. Station Grill deserves to be treated fairly and equally.

We Deserve More Options

As local residents, we want choice when it comes to where we eat late at night. Limiting newer food venues deprives us of that. Older venues shouldn't be the only ones allowed to serve us.

For example, 61 Queens Road is allowed to stay open until 3:00 AM, yet 62 Queens Road (Station Grill) is denied the same. This creates an unfair playing field.

Equal Opportunity in Business

All compliant businesses should be granted the same licensing rights. Station Grill's current situation is unfair and contradicts basic principles of equal opportunity and free enterprise.

A Much-Needed Community Asset

Access to hot, fresh, culturally diverse food late at night is becoming harder. Station Grill is one of the few places that meet that need—and they do so cleanly and responsibly.

Final Recommendation

Based on all these points, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They offer a safe, high-quality, and much-needed food service for Brighton's residents and visitors.

In Closing

Station Grill is an essential part of Brighton's late-night community. They are responsible, unique, and fully capable of offering something valuable that no one else does. Please approve their application.

Signed:

Date: 08 /07/2025

S23

From: REDACTED

Sent: 09 July 2025 00:43

To: REDACTED

Subject: Station Grill, Support of Late Night Refreshment Licence

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Name: REDACTED

Address: REDACTED

Witness Statement: Support for Late Night Refreshment Licence Application

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

As someone who regularly eats at Station Grill on 62 Queens Road, Brighton, I am submitting this formal statement in full support of their application for a Late Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton’s food sector.

Demand for Quality Food During Late Hours

As someone who’s often out during late hours, it’s challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including time spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to unwind.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site

- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business enjoys late-night trading.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Signed:

Date: 07 /07/2025

S24

From: REDACTED

Sent: 09 July 2025 20:57

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Support station grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Letter of Support – Late Night Refreshment Licence Application

Business: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a frequent guest at Station Grill, located at 62 Queens Road, Brighton, and I am submitting this statement to express my full support for their application for a Late Night Refreshment Licence (excluding the sale of alcohol).

Responsible Operation and Commitment to Licensing Goals

From my frequent visits, I can confidently say that Station Grill is run with a high level of professionalism. The staff are always respectful and courteous, and the space is safe, tidy, and welcoming. The manager, who I understand is a licensed SIA door supervisor, maintains an atmosphere of calm and control. I've seen first-hand that the business supports the four licensing objectives through its strong hygiene, staff conduct, good customer service, and proactive issue resolution.

Unique and Authentic Culinary Experience

Station Grill offers a food selection that combines Egyptian and Turkish cuisine—a combination that's not available anywhere else in Brighton, particularly during the late-night hours. Their meals are freshly prepared, consistently delicious, and culturally enriching. This diversity adds value to Brighton's culinary reputation.

Community Demand for Late-Night Food

I often need access to food during late hours, and options are limited. Station Grill is already a go-to venue for students, NHS workers, security teams, and other people working evening shifts. Giving them permission to open later would benefit many Brighton residents.

Central Location and Steady Foot Traffic

Queens Road serves as a key pedestrian route between Brighton Station and the town centre. Late-night footfall is high, and having a clean, alcohol-free food spot like Station Grill open during those hours would serve a public need.

Security and Cleanliness in the CIZ

Even though the business is within the Cumulative Impact Zone (CIZ), I have always felt secure while dining there. The well-trained staff, sanitary conditions, and well-managed service make Station Grill an ideal candidate for a CIZ exception.

Planning Is Not a Factor

To my knowledge, this situation is only about licensing. Planning permission is not needed for serving takeaway or delivery food after midnight. Therefore, planning concerns should not influence the decision.

Compatibility with Matrix Policy

Brighton's Licensing Matrix supports restaurant operations until midnight. Since Station Grill does not serve alcohol and already complies with good practice, granting permission to stay open later within safe parameters would be entirely appropriate.

No Connection to Local Crime

Based on community discussions and local reports, most night-time disturbances stem from alcohol-related venues. I've never seen or heard of any issues linked to Station Grill, which operates as a food-only business.

Manager's Professionalism and Experience

The manager brings late-night sector experience, having previously worked on West Street. In the time Station Grill has been open, there have been no incidents. This proves that the team is capable of managing a safe late-night operation.

No Harm to the Neighbourhood

Granting the application will not harm the area. On the contrary, having a calm, clean food outlet that doesn't sell alcohol could improve the night-time environment by offering people a safe space to eat and relax.

This Case Warrants a CIZ Exception

Due to the business's high hygiene standards, original menu, and responsible leadership, I believe this application is strong enough to be treated as an exceptional case within the CIZ.

Hygiene and Standards Exceed Nearby Takeaways

Other nearby venues don't match the cleanliness or food quality offered by Station Grill. The closest alternative has a 3-star hygiene rating, while Station Grill boasts a 5-star rating and is the only place offering Egyptian food nearby.

Compliance with Licensing Objectives

The manager at Station Grill shows real commitment to fulfilling all four licensing aims:

A. Crime and Disorder Prevention:

There's full CCTV coverage inside and outside. Incident logs are kept. The SIA-accredited manager ensures crowd control and premises security.

B. Public Safety:

The premises meet fire and health safety regulations. Signage is clear, and access routes are safe.

C. Public Nuisance Prevention:

Noise is limited with controlled entry. Daily waste disposal is enforced. Customers are politely encouraged to leave the premises quietly.

D. Protection of Children from Harm:

All employees receive training to:

Identify vulnerable individuals due to drugs, age, or intoxication

Handle such situations using an internal conflict policy

Document training sessions

Share training records with local officials and police upon request

Participate in verbal refresher training every 8 weeks, with all sessions recorded

Late-Night Offering with Cultural Identity

Station Grill is the only late-night takeaway in Brighton offering authentic, freshly prepared Egyptian-Turkish meals, available for both delivery and takeaway. It enhances the night-time economy with something truly unique.

Demand for Fresh Hot Food Late at Night

There is constant need for clean, quality food during late hours—especially among workers, students, and travellers. Existing venues don't fulfil that need effectively, and Station Grill steps up to fill that gap.

Excellent Location, According to Authorities

Sussex Police have acknowledged Queens Road as a high-traffic area. Station Grill is located perfectly to cater to late-night foot traffic safely and responsibly.

CIZ Exception Justified by Security Measures

While the venue is inside the CIZ, its high level of control and no-alcohol policy support an exemption:

Licensed door supervisor on site at night

Use of incident logs and staff training

No alcohol = lower public risk

Planning Permission Already Covered

Since Station Grill is a Class E(b) premises, it may operate as a restaurant, takeaway, and delivery service without planning permission—so long as takeaway isn't the dominant activity. Licensing is the only matter in question.

Matrix Framework and Practical Licensing

The Brighton & Hove matrix allows restaurants to remain open until midnight. Given Station Grill's food-only model, its extended hours request is in line with the spirit of current policy.

Crime Stats Not Applicable to This Venue

Most local crime is associated with alcohol-serving venues. Station Grill has never contributed to public disorder, so using general crime stats against them would be misleading.

Skilled Management with a Clean Record

The manager has been operating this business for over a year without any incident or complaint. His previous night-time food industry experience proves he can handle later hours effectively.

No Additional Cumulative Impact

The restaurant sells food only, has well-trained staff, and follows safety procedures. There is no indication that extended trading would increase crime, noise, or disturbance.

Strong Grounds for Licence Approval

Station Grill sells no alcohol, follows best practices, and serves a growing late-night demand. This is clearly a case where the licence should be granted on exceptional grounds.

Exceeds Hygiene Standards in the Area

Compared to other late-night takeaways nearby, Station Grill has a higher hygiene rating and offers a distinctive menu. Their 5-star score makes them a standout candidate.

Unbalanced Licensing Practices

It's troubling that older venues with lower hygiene continue to operate late, while newer businesses like Station Grill, with better standards, face resistance. This discourages progress and limits consumer choice.

Clear Disparity Between Neighbours

The business directly next door—at 61 Queens Road—has permission to open until 3:00 AM. Station Grill, at number 62, is not granted the same, despite operating more responsibly. If the difference is based on tenure or age, this may be discriminatory.

Licensing and Human Rights

The Licensing Policy acknowledges the Human Rights Act 1998:

Article 1 of the First Protocol protects the right to operate a lawful business. Blocking Station Grill's licence while permitting a similar neighbour to operate late could violate these rights.

Equal Treatment is a Licensing Requirement

All business owners deserve a fair chance, regardless of how long they've been trading. Station Grill has proven its value and compliance, and deserves equal opportunity.

We Need More Late-Night Food Options

Residents near the venue should not be forced to rely only on old establishments. We want choice, and denying new operators that chance limits our freedom as consumers.

A clear example: 61 Queens Road trades until 3:00 AM, while Station Grill is denied the same. This creates unfair market conditions.

Fair Access is a Basic Business Right

Station Grill operates lawfully, safely, and with high standards. They should not be denied the same late-night rights granted to others. Equal access is essential.

Valuable Community Asset

There's growing need for freshly cooked, culturally rich food during the night. Station Grill meets this demand and adds to the diversity of our city.

My Respectful Recommendation

In view of all these points, I ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence. They are reliable, hygienic, and ready to serve.

Summary Statement

Station Grill is a valuable, safe, and much-needed food venue in Brighton. Their licence application deserves your approval based on merit, responsibility, and community benefit.

Signed:

Date: 9/07/2025

S25

From: REDACTED

Sent: 09 July 2025 21:09

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc REDACTED

Subject: Support Station grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement: Support for Late Night Refreshment Licence Application

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

As someone who regularly eats at Station Grill on 62 Queens Road, Brighton, I am submitting this formal statement in full support of their application for a Late Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton's licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including time spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to unwind.

This Licence is Justified as an Exception

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

Identify vulnerable persons, whether due to age, intoxication, or substance misuse

Follow set procedures for conflict handling

Document and record all training

Share staff training logs with police or council officials upon request

Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

Having an SIA-trained security supervisor on site

Keeping a detailed incident log

Enforcing refuse policies

Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business enjoys late-night trading.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Signed:

Date: 9/07/2025

S26

From: REDACTED

Sent: 09 July 2025 22:58

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Station Grill support

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Support Letter for Late Night Refreshment Licence Application

Establishment: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

NAME: REDACTED

Address: REDACTED

As a regular customer of Station Grill, located at 62 Queens Road in Brighton, I'm writing this letter to fully endorse their application for a Late Night Refreshment Licence (non-alcoholic).

Responsible Business Practices and Licensing Objectives

As someone who visits Station Grill frequently, I've personally observed its strong management. The staff are courteous and efficient, and the premises are consistently clean and secure. The manager, who holds an SIA door supervisor licence, ensures a calm and well-ordered atmosphere. I've seen him promote all four licensing objectives through actions such as good hygiene, customer respect, effective communication, and rapid response to any concerns.

Unique Food Offering with Cultural Significance

Station Grill provides a combination of Egyptian and Turkish dishes not available elsewhere in Brighton—especially not late at night. The meals are freshly cooked, authentic, and full of flavour. This unique menu brings diversity and richness to the city's culinary landscape.

High Need for Late-Night Refreshment

As someone who works or travels late, I often find it difficult to access freshly prepared, high-quality food. Station Grill already serves night-shift workers, NHS staff, security personnel, and students. Extending their operating hours would be of great value to many in the community.

Central and Well-Frequented Location

Queens Road is one of Brighton's busiest streets, linking the train station with the city centre. I regularly see many people walking this route late at night, and they would benefit from a clean, safe food establishment that doesn't rely on alcohol.

Safe Operation in a Cumulative Impact Zone

Even though the restaurant is located in the ClZ, it maintains a strong sense of safety and responsibility. The staff are trained, service is controlled, and the environment is hygienic. I believe these factors justify treating Station Grill as an exception to ClZ restrictions.

Planning Permission Not Required

As far as I know, this matter concerns only licensing. Serving hot food for takeaway or delivery after midnight does not need planning permission, so this shouldn't stand in the way of granting the licence.

In Line with Licensing Matrix

The Brighton & Hove Licensing Matrix supports restaurant operation until midnight. Since Station Grill is a food-only business that already functions responsibly, I believe they should be permitted to stay open later under the right conditions.

No Link to Crime or Public Nuisance

From both local discussions and media reports, I understand that most late-night disturbances in the area are connected to alcohol-serving venues. As a food-only premises, Station Grill has never been involved in any such problems.

Skilled and Reliable Management

The manager of Station Grill has worked in the late-night food industry, including time spent on West Street. In all the time Station Grill has been open, there have been no complaints or incidents. This proves their ability to handle extended hours safely.

Community-Friendly Operation

Granting this licence will not negatively affect the neighbourhood. In fact, a clean, calm, alcohol-free restaurant operating late could help reduce local disturbances by giving people a positive place to gather.

Why This Licence is Justified

Because of its exclusive menu, widespread local support, top hygiene ratings, and responsible operation, I believe Station Grill should be seen as an exceptional case deserving an exemption from the CIZ rules.

Superior Hygiene and Service Compared to Others

The nearest similar takeaway has only a 3-star hygiene rating and doesn't match Station Grill in quality or cleanliness. Station Grill has a 5-star hygiene score and is the only nearby outlet serving Egyptian cuisine—further proving their value.

Supporting the Four Licensing Objectives

The Station Grill manager is strongly committed to meeting all licensing goals:

A. Preventing Crime and Disorder:

CCTV covers all major internal and external areas. All incidents are logged. As an SIA door supervisor, the manager is trained to handle security and crowd control effectively.

B. Public Safety:

The premises meet all fire and safety codes. Clear signs and accessible exit routes are in place.

C. Reducing Public Nuisance:

Daily waste disposal is practiced, noise is controlled, and customers are guided to leave quietly.

D. Protecting Children from Harm:

Staff are trained to:

Identify vulnerable individuals (e.g., intoxicated persons or minors)

Handle situations using a set conflict management policy

Maintain full documentation of all training

Provide records upon request to the police or council officers

Participate in refresher sessions at least every 8 weeks

A Standalone Offering in Brighton

No other late-night takeaway in Brighton offers this particular Egyptian and Turkish cuisine. The food is freshly made and available for delivery and takeaway, making Station Grill a unique contributor to Brighton's night economy.

Clear Local Demand

There is substantial need for hot food late at night, especially from students, NHS employees, shift workers, and commuters. Few venues meet this need, and Station Grill addresses that gap.

Ideal Position for Public Service

Sussex Police have identified Queens Road as a highly trafficked area, especially after dark. Station Grill's location makes it perfectly placed to serve that demand.

CIZ Exception Based on Safety Measures

Although the business is within the CIZ, this application should be considered on its own merits due to the following:

On-site SIA door supervisor during late hours

Incident logs, controlled waste handling, and structured staff training

Zero alcohol sales, meaning fewer risks

Planning Rules Already Met

This application is about licensing alone. As a Class E(b) premises, Station Grill can provide collection, takeaway, and delivery services without separate planning approval, as long as these remain minor elements of their core business.

Support from Matrix Guidelines

The Licensing Matrix already allows restaurants to open until midnight. Because Station Grill does not serve alcohol, it makes sense to permit them to operate slightly beyond that time—under careful supervision.

Crime Data Should Not Apply

The crime figures used in licensing decisions largely reflect issues caused by alcohol. Station Grill does not serve alcohol and should not be judged by unrelated statistics.

Proven Operational Experience

The current manager has worked in late-night food businesses, including one on West Street, and has managed Station Grill for over a year without incident. This record proves competence and control.

No Negative Impact on Licensing Objectives

The restaurant is food-only, responsibly run, and well-managed. It will not add to any cumulative issues related to crime, noise, or disorder.

A Truly Exceptional Case

Station Grill sells no alcohol, has an impeccable safety and hygiene record, and serves a clearly unmet need. These are all reasons the application deserves approval outside standard policy limits.

Hygiene and Food Quality Far Above Average

Nearby alternatives fall short in both cleanliness and food type. Station Grill's 5-star rating and unique Egyptian menu raise the bar for late-night dining options in the area.

Biased Restrictions Harm New Businesses

It seems that licensing policies are preventing new, cleaner businesses from operating late, while older venues with lesser standards are allowed to continue. This results in fewer options for the public and disadvantages responsible new operators.

Signs of Discrimination

The neighbouring premises at 61 Queens Road can trade until 3:00 AM. Station Grill at number 62 cannot. If the difference is based on how long they've operated or the owner's age, then that is neither fair nor justifiable. The manager of Station Grill is equally responsible and should be treated equally.

Human Rights Considerations

The Licensing Policy refers to the Human Rights Act 1998:

Article 1 of the First Protocol protects the right to run a lawful business without unjust limitations. Rejecting Station Grill's application—while allowing their next-door neighbour to operate—may breach this principle.

Fair Access for All Businesses

Business owners, whether new or established, should be judged by their actions and standards—not by arbitrary details like age or how long they've been open. Station Grill deserves to be treated fairly and equally.

We Deserve More Options

As local residents, we want choice when it comes to where we eat late at night. Limiting newer food venues deprives us of that. Older venues shouldn't be the only ones allowed to serve us.

For example, 61 Queens Road is allowed to stay open until 3:00 AM, yet 62 Queens Road (Station Grill) is denied the same. This creates an unfair playing field.

Equal Opportunity in Business

All compliant businesses should be granted the same licensing rights. Station Grill's current situation is unfair and contradicts basic principles of equal opportunity and free enterprise.

A Much-Needed Community Asset

Access to hot, fresh, culturally diverse food late at night is becoming harder. Station Grill is one of the few places that meet that need—and they do so cleanly and responsibly.

Final Recommendation

Based on all these points, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They offer a safe, high-quality, and much-needed food service for Brighton's residents and visitors.

In Closing

Station Grill is an essential part of Brighton's late-night community. They are responsible, unique, and fully capable of offering something valuable that no one else does. Please approve their application.

Signed:

Date: 8/07/2025

S27

From: REDACTED

Sent: 24 July 2025 22:24

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement: Support for Late Night

1.11 Human Rights

1.11.1 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).

 **PREVIOUS**
Executive Summary

NEXT 
2 Public Health and Alcohol

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My Name: REDACTED

My Address: REDACTED

Date: 23 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton's licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live

music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs

Yours sincerely

REDACTED

S28

From: REDACTED

Sent: 08 July 2025 12:05

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Fwd: Stay in the midnight during my night shift roaster

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Supportive Testimony for Late Night Refreshment Licence Application

Venue: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED .

As a loyal patron of Station Grill at 62 Queens Road, Brighton, I am submitting this statement in full support of their request for a Late Night Refreshment Licence (non-alcoholic).

Committed Management and Upholding Licensing Principles

Being a regular customer, I can personally confirm the high standard of management at Station Grill. Staff members are courteous and operate in a clean, secure, and welcoming setting. The manager, who I understand is SIA certified, effectively maintains a composed and well-regulated atmosphere. Their practices promote the four licensing objectives through actions like cleanliness, courteous service, effective communication, and fast problem resolution.

Distinctive and Culturally Rich Menu

Station Grill serves a rare mix of Egyptian and Turkish dishes, unavailable elsewhere in Brighton—especially late at night. The freshly cooked meals are notable for their

authenticity and rich taste. This offering adds significant cultural depth to the city's food options.

Consistent Need for Late-Night Meals

Being someone who often seeks late-night food, I've found few dependable choices. Station Grill already supports night-shift workers, NHS employees, students, and security staff. Allowing them to stay open longer would benefit many in the area.

Excellent Location for Footfall

Queens Road, leading from Brighton Station to the town centre, is a busy and active location. Late-night foot traffic is common, and many people could benefit from a clean, alcohol-free food venue along that route.

Security, Safety, and Hygiene

Though located within the Cumulative Impact Zone (CIZ), Station Grill maintains a secure and hygienic environment. The trained team and cleanliness make this a responsible business that merits being treated as an exception to CIZ restrictions.

Licensing Only—No Planning Barriers

To my knowledge, this is purely a licensing issue, and no extra planning approval is necessary to sell hot takeaway food after midnight. This should not hinder the application's success.

Alignment with Matrix Policy

Brighton & Hove's Licensing Matrix permits restaurants to operate until midnight. Since Station Grill doesn't serve alcohol and already functions responsibly, an extended licence under strict control is reasonable.

No Connection to Crime or Disturbance

Conversations and reports show that most disturbances in the area stem from alcohol-related venues. Station Grill, which doesn't sell alcohol, has never been associated with any public nuisance or disorder.

Proven Experience and Responsible Oversight

The manager brings extensive experience from working in the late-night food industry, including West Street. Since opening, Station Grill has operated without incident, demonstrating it can responsibly manage late hours.

Positive Influence on the Area

This licence will not harm the local area. On the contrary, having a secure, well-run, alcohol-free establishment open late can help reduce late-night noise and disorder by offering a place to relax and eat.

Why This Case Deserves Consideration

Due to its distinct food, strong community support, hygiene, and operational responsibility, this case is exceptional and should be approved despite the CIZ designation.

Hygiene and Standards Surpass Competitors

The closest alternative late-night takeaway holds only a 3-star hygiene score, while Station Grill boasts a 5-star rating. No local rivals serve Egyptian cuisine either, making this venue a standout option.

Support for Licensing Objectives

Station Grill's manager is devoted to the four licensing principles:

A. Preventing Crime and Disorder: CCTV is set up covering key areas inside and out. All incidents are logged. As an SIA licence holder, the manager can control crowds and maintain public safety.

B. Ensuring Public Safety: The location follows fire and safety regulations with visible signs and safe access routes.

C. Avoiding Public Nuisance: Daily waste removal, minimal noise, and managed entry reduce disruption. Customers are encouraged to leave quietly.

D. Protecting Children from Harm: Staff receive training to:

Identify vulnerable individuals (due to age, intoxication, or drugs)

Handle conflict using a clear policy

Log and document all training sessions

Present training records to Sussex Police or regulatory bodies when asked

Participate in refresher training at least every 8 weeks with all sessions logged.

Unparalleled Food and Community Relevance

Station Grill is the only late-night provider of combined Egyptian and Turkish meals in Brighton. Their freshly prepared food for delivery and collection enriches Brighton's night economy.

Clear Local Demand

NHS staff, students, security workers, and late-night travellers create consistent demand for quality food. This need is not met by current offerings.

Location Suited for Service

Sussex Police recognise that Queens Road is a major route with heavy footfall from the train station. Station Grill is well-positioned to meet that demand.

CIZ Placement Offset by Safety Efforts

Though in the CIZ, the business is an exception due to proactive safety protocols:

A licensed SIA door supervisor on duty at night

Incident logging, cleanliness, and trained staff

No alcohol service, reducing potential issues

Planning Clarified

As a Class E(b) premises, the venue may offer delivery, takeaway, or collection without additional planning consent—as long as these remain secondary to the restaurant's primary function.

Matrix Policy Alignment

While the Matrix supports restaurants until midnight, Station Grill wants slightly extended hours—justified by its non-alcoholic nature and strong safeguards.

Crime Statistics Not Relevant

Area crime often links to alcohol. Since Station Grill sells only food, it hasn't contributed to any such incidents.

Qualified Management

The manager, an SIA licence holder, has worked in similar late-night roles before, including a kebab shop on West Street. Station Grill has operated over a year without any complaints or issues.

No Added Cumulative Impact

Because the venue sells food only and is responsibly managed, there's no additional burden on public safety, noise, or disorder.

Unique Circumstances Support Licence

No alcohol, high hygiene standards, and unique cultural offerings create a case deserving an exemption from policy limitations.

Excellence in Hygiene and Authenticity

Nearby late-night venues fall short in comparison. Station Grill's 5-star hygiene rating and cultural menu make it a valuable outlier.

Concerns About Unfair Practices

It's troubling that older, less clean venues can stay open while new, cleaner ones like Station Grill face resistance. This suggests an informal curfew that doesn't reflect Brighton's values.

Signs of Unequal Treatment

The business next door at 61 Queens Road trades until 3:00 AM. Denying Station Grill the same chance—possibly due to the owner's youth or shorter tenure—is unfair and potentially discriminatory.

Respect for Human Rights

The Licensing Policy mentions the Human Rights Act 1998:

Article 1 protects the peaceful use of property, including running a business.

Refusing this licence could violate those rights when an adjacent business operates longer under similar conditions.

Every Business Deserves a Fair Shot

Owners of all ages and durations should be assessed fairly. Station Grill's safety, professionalism, and service merit an equal chance to trade.

Resident Needs and Equal Access

As locals, we want more late-night food options—not just old establishments. Blocking new licences shrinks our choices and benefits only older businesses.

This bias disadvantages newer, younger owners—preventing them from accessing opportunities open to others in the past. Station Grill at 62 Queens Road deserves the same late-night rights granted to 61 Queens Road.

Economic Justice and Community Value

All legitimate businesses should compete under equal conditions. Station Grill's fairness case also aligns with human rights and community interest.

Community Demand is Unmet

The lack of late-night healthy options, especially Egyptian/Turkish food, is deeply felt. Station Grill would fill this gap.

Final Request

Based on all the above, I kindly ask the Licensing Authority, Sussex Police, and the Court to approve Station Grill's Late Night Refreshment Licence.

Final Words

Station Grill contributes significantly to Brighton's nightlife. It is secure, unique, responsible, and addresses an unmet need. I respectfully urge approval of this licence.

Signed:

Date: 05 / 07 / 2025

S29

From: REDACTED

Sent: 24 July 2025 19:22

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement: Support for Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My Name: REDACTED

My Address: REDACTED

Date: 24 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant’s opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an

application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic

- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their

license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

REDACTED

S30

From: REDACTED

Sent: 24 July 2025 19:45

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>;

Bahaa.azmy1@yahoo.com

Subject: Support for Station Grill Late Night Refreshment Licence Witness Statement from REDACTED

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Notes on matrix

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

1. Each application will be considered on individual merit
2. Applications within the CIZ are subject to the special policy on cumulative impact at para 3.1, and those within the special stress area to the special stress policy considerations at para 3.2.
3. Departure from the matrix policy is expected only in exceptional circumstances
4. Exceptional circumstances will not include quality of management or size of venue except where explicitly stated in policy matrix.
5. Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).

1.11 Human Rights

1.11.1 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).



PREVIOUS
Executive Summary

NEXT
2 Public Health and Alcohol



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

	Cumulative Impact Area	Special Stress Area	Other Areas
Restaurant	Yes (midnight)	Yes (midnight)	Yes (midnight)
Café	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
Late Night Takeaways	No	Yes (midnight)	Yes (midnight)
Night Club	No	No	No
Pub	No	Yes (11pm)	Yes (midnight)
Non-alcohol lead (e.g. Theatre)	Yes (favourable)	Yes (favourable)	Yes (favourable)
Off-licence	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
Members Club (club premises certificate)	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.

ments but as a general rule, a bowl of crisps, nuts, or olives does not constitute substantial food.

3.3.3 Restaurants - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following restaurant condition.

- 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.
- Restaurants with outside service - the licensing authority will also consider applications from restaurants 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.

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 24 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals.

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains

secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight.

Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant’s opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house

might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce

it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets sometimes with poor hygiene to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses.

Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business regardless of owner age or operating history deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

S31

From: REDACTED

Sent: 24 July 2025 22:56

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>;
Bahaa.azmy1@yahoo.com

Subject: Support for Station Grill Late Night Refreshment Licence Witness Statement from REDACTED

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Notes on matrix

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

1. Each application will be considered on individual merit
2. Applications within the CIZ are subject to the special policy on cumulative impact at para 3.1, and those within the special stress area to the special stress policy considerations at para 3.2.
3. Departure from the matrix policy is expected only in exceptional circumstances
4. Exceptional circumstances will not include quality of management or size of venue except where explicitly stated in policy matrix.
5. Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).

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

	Cumulative Impact Area	Special Stress Area	Other Areas
Restaurant	Yes (midnight)	Yes (midnight)	Yes (midnight)
Café	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
Late Night Takeaways	No	Yes (midnight)	Yes (midnight)
Night Club	No	No	No
Pub	No	Yes (11pm)	Yes (midnight)
Non-alcohol lead (e.g. Theatre)	Yes (favourable)	Yes (favourable)	Yes (favourable)
Off-licence	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
Members Club (club premises certificate)	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 24 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw

a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton’s food sector.

Demand for Quality Food During Late Hours

As someone who’s often out during late hours, it’s challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

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Consistency with the Licensing Matrix

Brighton's licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

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The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

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Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

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The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

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The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption

based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses.

Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business regardless of owner age or operating history deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

S32

From: REDACTED

Sent: 24 July 2025 14:55

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement: Support for Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.

In September 2020 new change of use legislation was introduced. This introduced new Class E (commercial, business and service) and Class F (Local Community and Learning) use classes and revoked classes A, B and D. The new Class E incorporates the previous A1 (shops), A2 (professional and financial services), A3 (restaurants and cafes) and B1 (Business) use classes plus gyms, nurseries and health centres previously in classes D1 (Non-residential institutions) and D2 (Assembly and leisure) while making A4 (drinking establishments) and A5 (hot food takeaways) plus cinemas, concert, dance and bingo halls Sui Generis uses. Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission. This AMR reflects the changes in floorspace of uses both prior to and after the change to the use class order and this will continue to be the case while applications submitted before September 2020 remain extant.

Table 2: Permitted Development Rights after April 2015 and amendments after August 2021 amendments

From Use Class	To Use Class	
	Permanent	Temporary/Flexible
E commercial, business and service	C3 [1] (no more than 1,500m ²) A mixed SG use comprising a betting office or a pay day loan shop, or E and C3 up to 2 flats [1]	F1b/F1c/F1d/F1e [2]
Eb restaurants and cafes		SG (hot food takeaways) [3]
SG Public house, wine bar, or drinking establishment	SG Drinking establishment with expanded food provision.	
SG Drinking establishment with expanded food provision	SG A Public house, wine bar, or drinking establishment	
B2 (general industrial)	B8 (no more than 500m ²)	

ments but as a general rule, a bowl of crisps, nuts, or olives does not constitute substantial food.

3.3.3 Restaurants - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following restaurant condition.

- 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.
- Restaurants with outside service - the licensing authority will also consider applications from restaurants 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.

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

	Cumulative Impact Area	Special Stress Area	Other Areas
Restaurant	Yes (midnight)	Yes (midnight)	Yes (midnight)
Café	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
Late Night Takeaways	No	Yes (midnight)	Yes (midnight)
Night Club	No	No	No
Pub	No	Yes (11pm)	Yes (midnight)
Non-alcohol lead (e.g. Theatre)	Yes (favourable)	Yes (favourable)	Yes (favourable)
Off-licence	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
Members Club (club premises certificate)	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

1.11 Human Rights

1.11.1 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).

[PREVIOUS](#)
Executive Summary

[NEXT](#)
2 Public Health and Alcohol

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 19 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and

students, Sponsoring local events or charities), community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service), alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

S33

From: REDACTED

Sent: 24 July 2025 15:31

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>;

bahaa.azmy1@yahoo.com

Subject: Support for Station Grill Late Night Refreshment Licence Witness Statement from REDACTED

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 24 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals.

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol a much-needed option in the area.

Safety and Hygiene Even Within the CIZ, Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight.

Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant’s opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and

characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

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The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional

circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and

delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site.
- Keeping a detailed incident log.
- Enforcing refuse policies.
- Zero alcohol sales significantly reducing disorder risks.

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all

nearby takeaways.

Unfair Licensing Discrepancies;

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets sometimes with poor hygiene to operate late into the night.

This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses.

Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business regardless of owner age or operating history deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused.

This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food

needs.

Yours sincerely

S34

From: REDACTED

Sent: 24 July 2025 14:29

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement: Support for Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

My Name: REDACTED

My Address: REDACTED

Date: 23 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor,

consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton’s food sector.

Demand for Quality Food During Late Hours

As someone who’s often out during late hours, it’s challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

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Consistency with the Licensing Matrix

Brighton's licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered

exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

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Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

REDACTED

S35

From: REDACTED

Sent: 24 July 2025 17:43

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Support for Late Night Refreshment Licence Application

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

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

	Cumulative Impact Area	Special Stress Area	Other Areas
Restaurant	Yes (midnight)	Yes (midnight)	Yes (midnight)
Café	Yes (10 pm)	Yes (10 pm)	Yes (10 pm)
Late Night Takeaways	No	Yes (midnight)	Yes (midnight)
Night Club	No	No	No
Pub	No	Yes (11pm)	Yes (midnight)
Non-alcohol lead (e.g. Theatre)	Yes (favourable)	Yes (favourable)	Yes (favourable)
Off-licence	No	No	Yes (Up to 11pm but if in densely residential area may be earlier – see note 7 below)
Members Club (club premises certificate)	Yes (<100 capacity) (11pm)	Yes (<100 capacity) (11pm)	Yes

Notes on matrix

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

1. Each application will be considered on individual merit
2. Applications within the CIZ are subject to the special policy on cumulative impact at para 3.1, and those within the special stress area to the special stress policy considerations at para 3.2.
3. Departure from the matrix policy is expected only in exceptional circumstances
4. Exceptional circumstances will not include quality of management or size of venue except where explicitly stated in policy matrix.
5. Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, an appropriate corporate social responsibility policy, community contribution to offset impact (such as financial contribution to infrastructure), community support, alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts).

merits but as a general rule, a bowl of crisps, nuts, or olives does not constitute substantial food.

3.3.3 Restaurants - the licensing authority may be prepared to look favourably upon an application for the grant of a licence, subject to the following restaurant condition.

- 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.
- Restaurants with outside service - the licensing authority will also consider applications from restaurants 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.

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances. The fact that a premises will be/is exceptionally well managed with a well qualified applicant, or that there are no residential premises nearby, will not be considered exceptional.

In September 2020 new change of use legislation was introduced. This introduced new Class E (commercial, business and service) and Class F (Local Community and Learning) use classes and revoked classes A, B and D. The new Class E incorporates the previous A1 (shops), A2 (professional and financial services), A3 (restaurants and cafes) and B1 (Business) use classes plus gyms, nurseries and health centres previously in classes D1 (Non-residential institutions) and D2 (Assembly and leisure) while making A4 (drinking establishments) and A5 (hot food takeaways) plus cinemas, concert, dance and bingo halls Sui Generis uses. Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission. This AMR reflects the changes in floorspace of uses both prior to and after the change to the use class order and this will continue to be the case while applications submitted before September 2020 remain extant.

Table 2: Permitted Development Rights after April 2015 and amendments after August 2021 amendments

From Use Class	To Use Class	
	Permanent	Temporary/Flexible
E commercial, business and service	C3 [1] (no more than 1,500m ²) A mixed SG use comprising a betting office or a pay day loan shop, or E and C3 up to 2 flats[1]	F1b/F1c/F1d/F1e [2]
Eb restaurants and cafes		SG (hot food takeaways) [3]
SG Public house, wine bar, or drinking establishment	SG Drinking establishment with expanded food provision.	
SG Drinking establishment with expanded food provision	SG A Public house, wine bar, or drinking establishment	
B2 (general industrial)	B8 (no more than 500m ²)	

1.9 The Planning Context

1.9.1 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

1.11 Human Rights

1.11.1 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).



PREVIOUS
Executive Summary

NEXT
2 Public Health and Alcohol



Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 19 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton’s food sector.

Demand for Quality Food During Late Hours

As someone who’s often out during late hours, it’s challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

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Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

S36

From: REDACTED

Sent: 24 July 2025 13:12

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Witness Statement

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

1.11 Human Rights

1.11.1 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:-

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Executive Summary

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Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 23 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident who regularly eats at Station Grill on 62 Queens Road, Brighton, I saw a BLUE NOTICE document on the front shop window of Station Grill, 62 queens road, Brighton, BN13XD, few weeks ago and yesterday, this paper is one the shop I think since first week in April 2025, and never ever removed from the window till now, and I think the one I saw recently is a new one as there is a different dates on the previous paper and the current paper, as I read both of them.

Anyway, I am submitting this formal statement in full support of their application for a Late-Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton's licensing matrix supports food venues remaining open until midnight.

Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It's well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU), an appropriate corporate social responsibility policy(their plan showing how their business will act responsibly and support the local community for example,

Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to compensate for any potential negative impact such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support this application and they confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service),alcohol sale ancillary to business activity (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will NOT sell alcohol at all and this should make their case stronger in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application meets the criteria for exceptional circumstances. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, 'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'. And it does not give to what extend and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a

license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log

- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, it's inappropriate to judge this application using unrelated data.

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Yours sincerely

S37

From: REDACTED

Sent: 17 July 2025 10:07

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>; REDACTED

Subject: Support Station Grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 05 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As someone who regularly eats at Station Grill on 62 Queens Road, Brighton, I am submitting this formal statement in full support of their application for a Late Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

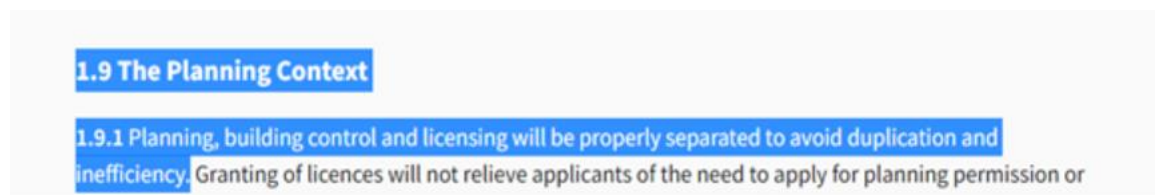
Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :



As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant's opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

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*The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and **non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).***

The premises is:

- **Non-alcoholic**
- **Food-focused**
- **Small in size**
- **Willing to accept licence conditions**
- **Committed to hiring trained staff and implementing public safety measures**

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application **meets the criteria for exceptional circumstances**. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, '*if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics*'. **And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.**

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

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D. Protecting Children from Harm:

All employees are trained to:

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Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, **it's inappropriate to judge this application using unrelated data.**

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

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It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

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The Licensing Policy references the Human Rights Act 1998:

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All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

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Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Kind Regards

S38

From: REDACTED

Sent: 17 July 2025 09:40

To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>; REDACTED

Subject: Support Station Grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

Date: 16 / 07 / 2025

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

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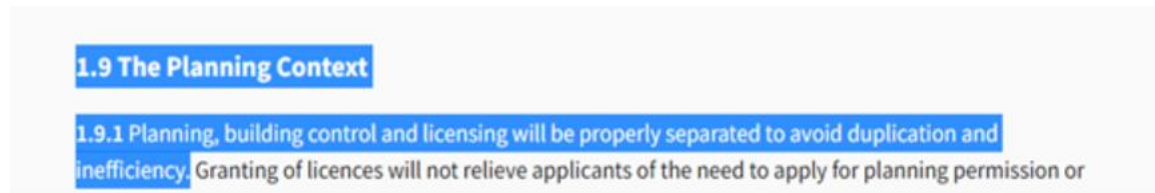
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It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

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The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

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- **Willing to accept licence conditions**
- **Committed to hiring trained staff and implementing public safety measures**

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application **meets the criteria for exceptional circumstances**. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, *'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'*. **And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.**

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse
- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, **it's inappropriate to judge this application using unrelated data.**

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, **especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.**

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Kind Regards

S39

Witness Statement in Support of Late Night Refreshment Licence Application

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

From:

Address :

Date:

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1. Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through

practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2. Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3. High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4. Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5. Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6. Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7. Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8. No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9. Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such

an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

10. No Negative Impact on the Area

Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

11. Exceptional Circumstances Justify This Licence

Given its unique menu, strong community support, high hygiene standards, and responsible operation, I strongly believe this is an exceptional case and should be granted a licence despite the CIZ policy.

12. Hygiene and Quality Compared to Other Late-Night Options

The nearest alternative takeaway has a lower hygiene rating (3 stars) and is nowhere near as clean or high-quality as Station Grill, which has a 5-star food hygiene rating. Also, none of the nearby takeaways serve Egyptian food, which adds even more weight to this application.

13. **Promotion of the Licensing Objectives**

the responsible manager of Station Grill is fully committed to promoting all four licensing objectives:

- A. Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area
 - B. Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.
 - C. Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.
 - D. Protection of Children from Harm: All staff will be trained in:
 - Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.
- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.
 - All training undertaken by staff members will be fully documented and recorded.

- All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.
- 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.

14. • Unique Culinary Offering

Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15. • Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16. • Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17. • Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18. A trained SIA-licensed door supervisor is on site during late-night hours.
19. Clear incident logs, refuse control, and staff training policies are in place.
20. There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21. • Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can-do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22. • Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23. • Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24. • Manager's Experience

He holds an SIA Door Supervisor licence and have more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25. • No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26. • Exceptional Circumstances Justifying the Application

Given the type of cuisine, **NO ALCOHOL WE BE SOLD**, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27. • Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28. Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29. Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

30. Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

- Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.
- In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business, next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31. Every business owner—regardless of age or how long they've been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32. As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

- For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.
- We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate

under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33. We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34. In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. They are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed:

Signature:

Date :

REDACTED

S40

From: REDACTED

Sent: 11 July 2025 10:24

To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>

Cc: REDACTED

Subject: Support station grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement in Support of Late Night Refreshment Licence Application..My name is REDACTED

Premises: Station Grill, 62 Queens Road, Brighton, BN1 3XD

Submitted to: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court

Name: REDACTED

Address: REDACTED

I am a regular customer of Station Grill, located at 62 Queens Road, Brighton, and I am writing this statement in full support of their application for a Late Night Refreshment Licence (without alcohol).

1.

Responsible Management and Support for Licensing Objectives

As a frequent visitor, I have witnessed first-hand how well-managed Station Grill is. The manager and staff are professional, polite, and clearly dedicated to ensuring a safe, clean, and welcoming environment. The manager, who I understand is also an SIA door supervisor, always maintains a calm and controlled atmosphere, supporting the four licensing objectives through practical steps such as cleanliness, polite service, clear customer communication, and quick response to any potential issues.

2.

Unique and Valuable Food Offering

Station Grill offers a unique combination of Egyptian and Turkish cuisine, which is not available elsewhere in Brighton—especially not during late hours. The food is freshly prepared and genuinely stands out for its authenticity, quality, and taste. This variety brings cultural value to the local food scene.

3.

High Demand for Late-Night Food

As someone who needs food late at night, I find it very difficult to find good-quality, hot food late at night. Station Grill has already become a reliable option for students, NHS staff, night shift workers, and security staff. Extending their hours would be a huge benefit to the local workforce and community.

4.

Busy and Well-Suited Location

Queens Road is a very busy and well-used route from Brighton Station to the city centre. I often see people passing by late at night, many of whom would benefit from a clean, safe place to get food without needing to rely on venues that serve alcohol.

5.

Security and Cleanliness

Despite being in the Cumulative Impact Zone (CIZ), Station Grill has always felt safe and secure. The presence of trained staff, cleanliness, and controlled service make it

a responsible business. I believe these security measures justify treating this application as an exception to the CIZ policy.

6.

Clarification on Planning

From my understanding, this is a licensing matter only, and no planning permission is needed to serve hot food after midnight for takeaway or delivery. That should not be an obstacle to granting the licence.

7.

Matrix Policy Considerations

The Council's matrix already supports restaurants staying open until midnight. Since Station Grill does not serve alcohol and already operates responsibly, it makes sense to allow them to open later under controlled conditions.

8.

No Link to Crime or Disorder

From local news and conversations, I understand that most late-night disturbances in the area are related to alcohol consumption, not to food-only venues like Station Grill. I have never seen any disorder or nuisance associated with this business.

9.

Experienced and Reliable Management

The manager's background in working in the late-night food sector, particularly on West Street, shows his understanding of how to manage such an operation responsibly. In the time Station Grill has been open, there have been no problems at all, which proves its capability to operate safely during extended hours.

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Granting this licence would not have any negative impact on the neighbourhood. In fact, having a clean, well-run, alcohol-free venue open late might help reduce noise and disorder by giving people a place to eat and wind down.

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13.

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A.

Prevention of Crime and Disorder: CCTV is installed covering all key areas both inside and outside the premises, and a record of incidents will be kept. He is a licensed SIA door supervisor which give advantages to the premises to manage any crowds and provide security to the area

B.

Public Safety: The premises comply with all fire and safety regulations, including clear signage and safe access routes.

C.

Prevention of Public Nuisance: Waste disposal is managed daily, noise is kept to a minimum with controlled entry, and customers are encouraged to leave the premises quietly.

D.

Protection of Children from Harm: All staff will be trained in:

-

Identifying persons who are vulnerable which could include but not limited to, their age or due to intoxication and or drugs as well as identifying potential perpetrators.

- Conflict management. The operator will have a policy in place assisting staff in how to deal with such situations.

-

All training undertaken by staff members will be fully documented and recorded.

-

All training records will be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

-

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Station Grill is the only late-night food venue in Brighton offering a mixed Egyptian and Turkish cuisine, freshly prepared on-site and available for takeaway and delivery. the menu adds cultural and culinary diversity to the city's night-time economy.

15.

- Community Demand

There is a high demand for fresh, hot food late at night, particularly from students, NHS staff, night-shift workers, security personnel, and members of the public commuting through the area. This demand is not currently being met by existing food venues in the area.

16.

- Location and Footfall

Sussex Police have acknowledged that Queens Road is a busy thoroughfare, with significant foot traffic from Brighton Station to the city centre, particularly during late hours. Station Grill is ideally located to serve this high demand.

17.

- Cumulative Impact Zone (CIZ) and Exceptional Security Measures

Although the premises are situated within the CIZ, we believe this application is justified as an exceptional case due to the nature of the business and their proactive approach to safety:

18.

A trained SIA-licensed door supervisor is on site during late-night hours.

19.

Clear incident logs, refuse control, and staff training policies are in place.

20.

There is no alcohol sold or consumed on the premises, which significantly reduces the risk of alcohol-related disorder.

21.

- Planning Permission Clarification

This application concerns licensing only and does not require planning permission to serve hot food for takeaway or delivery after midnight as these are standard operations for any restaurants, which has been clarified under the relevant planning and licensing legislation. As the premises is on class E(b), so they are a restaurant and can do delivery, takeaway and collection without the need for planning permission as long as these operations are ancillary and not prominent to the premises

22.

- Support from the Licensing Matrix

Brighton & Hove's Licensing Matrix supports restaurants operating until midnight. Given that Station Grill offers food only and no alcohol, they seek to operate beyond this threshold with robust safeguards in place.

23.

- Irrelevance of Crime Data

Crime data cited in the area largely relates to alcohol-related incidents, which are not applicable to Station Grill. The premises do not serve alcohol, and the existing operations have not contributed to crime or disorder.

24.

- Manager's Experience

He holds an SIA Door Supervisor licence and has more than a year of experience working in the night-time economy, including late-night kebab shop on West Street, Brighton. He managed Station Grill for over a year, with no incidents or complaints logged during that time.

25.

- No Negative Cumulative Impact

Their operation is responsibly run, professionally managed, and strictly food-based. As such, there will be no negative cumulative impact on the licensing objectives, especially regarding crime, disorder, or public nuisance.

26.

- Exceptional Circumstances Justifying the Application

Given the type of cuisine, NO ALCOHOL WILL BE SOLD, clean safety record, and very high public demand, this application should be considered as an exceptional case, warranting a departure from the Council's Special Policy.

27.

- Food Hygiene and Quality Standards

Nearby alternatives do not maintain the same standard. The closest LNR has a 3-star food hygiene rating, while Station Grill has a 5-star rating, inspected and certified by local Environmental Health. Additionally, no other venue offers Egyptian cuisine, which distinguishes the premises further.

28.

Unfair Restrictions and Implied Curfew

It is concerning that the police appear to be discouraging new late-night food venues from opening, while existing premises—some of which have lower hygiene ratings—continue to operate until very late (e.g. 3:00 am). This approach creates an environment where people are forced to buy from older, less clean establishments, as if an informal curfew on people and new businesses is in place. That is not fair to consumers, nor does it align with Brighton's image as a progressive and diverse city.

29.

Disparity and Possible Discrimination

It is unfair and possibly discriminatory that a neighbouring takeaway is allowed to trade until 03:00 am, while Station Grill is being prevented from doing the same. If the only difference is that the other shop has been there longer or the owner is older, that should not entitle them to more favourable treatment. Station Grill's manager is younger but just as responsible, experienced, and capable, and he deserves a fair chance to operate on equal terms.

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Human Rights and Fair Treatment

It is important to note that the Licensing Policy itself acknowledges the relevance of the Human Rights Act 1998, including:

-

Article 1 of the First Protocol, which protects the right to peaceful enjoyment of possessions, including the right to operate a lawful business without unfair restrictions.

-

In this case, I believe that refusing or discouraging Station Grill's licence application, despite its high standards, responsible management, and very high public demand, could be seen as a breach of these rights, especially when a neighbouring business,

next door at 61 Queens road , Brighton, BN13XD is allowed to operate until 3:00 am under similar circumstances.

31.

Every business owner—regardless of age or how long they’ve been trading—should be treated fairly, with decisions based on evidence and merit, not on arbitrary factors. Station Grill meets every reasonable expectation of a responsible, safe, and valuable late-night food venue, and should therefore be given equal opportunity to trade.

32.

As residents living adjacent to the premises, we believe it is our right to have access to a variety of late-night refreshment providers. Denying a late-night refreshment licence to new businesses effectively limits our choices and compel us to purchase from a small number of long-established shops that were granted such licences many years ago.

This practice raises concerns of unfair discrimination, as it allows existing licence holders to continue trading late into the night while new businesses are excluded from the same opportunity. Such a policy disproportionately favours older establishments and individuals who were able to open their businesses in the past, while disadvantaging newer business owners—often younger entrepreneurs—who are now being denied access to the same trading rights.

•

For instance, the premises at 61 Queens Road, directly adjacent to Station Grill at 62 Queens Road, is permitted to trade until 3:00 AM. Meanwhile, Station Grill has been refused a comparable licence, placing it at a clear competitive disadvantage.

•

We believe this situation undermines the principles of fairness and equal opportunity. Every lawful business should be granted the ability to operate under the same regulatory conditions, without arbitrary restrictions. Equal access to trading rights is not only a matter of economic justice but also a basic human right.

33.

We find it increasingly difficult to access hot, healthy, freshly prepared food during late-night hours—particularly Egyptian and Turkish cuisine. There is a clear demand in the area for clean, friendly, welcoming premises offering this type of food, and such an establishment would be a valuable addition to the local community.

34.

In light of the above points,

I respectfully request that the Licensing Authority, Sussex Police, and the Court consider this application on its merits and grant the Late Night Refreshment Licence for Station Grill. they are committed to providing a safe, clean, culturally enriching, and much-needed food service to the Brighton community during late-night hours.

Conclusion:

Station Grill is a valuable part of the Brighton community. It is safe, unique, well-managed, and offers something that is currently missing in the city's late-night economy. I respectfully urge the Licensing Authority, Police Licensing, and the Court to approve their Late Night Refreshment Licence application.

Signed:

Date: 11/ 07 / 2025

S41

From: REDACTED

Sent: 19 July 2025 17:19

To: REDACTEDEHL Licensing <EHL.licensing@brighton-hove.gov.uk>; REDACTED

Subject: Support Station Grill

SC CON ENDS: 25.07.2025 VALID PCD, PPN, PS, PCH & CIZ (S)

Witness Statement: Support for Late Night Refreshment Licence Application

My Name: REDACTED

My Address: REDACTED

· **Date: 15 / 07 / 2025**

Venue Name: Station Grill, 62 Queens Road, Brighton, BN1 3XD

To Be Submitted To: Brighton & Hove City Council Licensing Authority, Sussex Police Licensing, and the Court.

Dear sir / madam,

As a resident and neighbour who regularly eats at Station Grill on 62 Queens Road, Brighton, I am submitting this formal statement in full support of their application for a Late Night Refreshment Licence (no alcohol involved).

Well-Managed Venue and Support of Licensing Goals

Being a frequent customer, I have repeatedly observed how efficiently Station Grill is operated. The team is professional, courteous, and always ensures a welcoming, hygienic, and secure space. The manager, a certified SIA door supervisor, consistently creates a peaceful atmosphere and works proactively to uphold the four licensing objectives—focusing on cleanliness, polite communication, efficient customer service, and quick intervention when needed.

Distinctive Menu Enhancing Cultural Variety

Station Grill serves a unique and appealing menu blending Egyptian and Turkish dishes, which are not offered anywhere else in Brighton—especially late in the evening. The meals are fresh, authentic, and consistently high in quality. This brings valuable cultural representation to Brighton's food sector.

Demand for Quality Food During Late Hours

As someone who's often out during late hours, it's challenging to find well-made food late at night. Station Grill is already serving an essential role for key groups such as students, security staff, NHS professionals, and night shift workers. Allowing them to extend their trading hours would be a major advantage for the community.

Ideal Location with High Footfall

Queens Road is a well-used pedestrian route linking Brighton Station with the city centre. Many people walk by the venue at night, and Station Grill could serve as a safe, reliable food outlet without alcohol—a much-needed option in the area.

Safety and Hygiene Even Within the CIZ

Despite its location within the Cumulative Impact Zone (CIZ), Station Grill remains secure and well-run. The presence of trained staff, its orderly service, and cleanliness clearly show this business is responsible and should be considered an exception to the CIZ rule.

Licensing Focus Only – Planning Not an Issue

As per SoLP :

As per 1. Authority Monitoring Report 2020/21,

“Any use within the new E use class is able to change to another use, or mix of uses, within the same use class without the need for planning permission.”

To the best of my understanding, this is strictly a licensing issue. Selling hot food for delivery or takeaway past midnight does not require planning approval, and thus, planning concerns should not affect the outcome of this application.

Consistency with the Licensing Matrix

Brighton’s licensing matrix supports food venues remaining open until midnight. Station Grill, which does not sell alcohol and already operates responsibly, should be permitted to stay open longer under clearly defined safeguards.

No History of Crime or Anti-Social Incidents

It’s well known through local news and conversations that most late-night disturbances are linked to alcohol. Station Grill, as a food-only establishment, has no such associations. I have never seen any issues during my visits.

Competent, Experienced Management

The manager has valuable experience in the late-night food sector, including more than a year spent operating a food outlet on West Street. Since Station Grill began operating, it has had no complaints or problems, showing the team can run a late-night service safely.

No Adverse Impact on Local Environment

Extending the restaurant’s opening hours would not cause problems in the neighbourhood. On the contrary, having a quiet, clean, and sober venue open late may help reduce public disorder by offering a peaceful place to collect food or delivery to residential address.

This Licence is Justified as an Exception

3.1.9 Furthermore, this special policy is not absolute. Upon receipt of a relevant representation, the licensing authority will always consider the circumstances of each case and whether there are exceptional circumstances to justify departing from its special policy in the light of the individual circumstances of the case. If an application is unlikely to add to the cumulative impact of the area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics. For example, while a large nightclub or high capacity public house might add to problems of cumulative impact, a small restaurant, theatre or live music venue (where alcohol is not the primary activity) may be considered exceptional circumstances.

Notes on matrix as per SoLP

Subject to the following notes, the policy, as represented in the matrix, will be strictly adhered to:

5- Exceptional circumstances may include: consultation with and meeting requirements of responsible authorities, As I have been told and I trust and confirm that (**THE MANAGEMENT ARE HAPPY TO CO-OPERATE WITH THE POLICE AND ACCEPT POLICE PROPOSED CONDITIONS, INCLUDING INSTALLING CCTV, AND the manager is A SIA DOOR SUPERVISOR AND have a CONTRACT WITH MSU**), an appropriate corporate social responsibility policy(their plan showing how my business will **act responsibly and support the local community for example, Hiring local staff, Reducing noise or litter Offering discounts to NHS workers and students, Sponsoring local events or charities**),community contribution to offset impact (such as financial contribution to infrastructure)(they will be offering something to **compensate for any potential negative impact** such as Help fund extra street cleaning, Install outdoor bins, Contribute to a community safety scheme (like CCTV on the street or any other approved schemes or projects). community support (as far as I Know , the licensing team and the management have received too many witness statements from the local residents, customers and neighbours to support **this application** and they **confirmed the premises is beneficial, the shop will help keep the area safer, They prefer regulated food options, the business provides a good community service**),**alcohol sale ancillary to business activity** (demonstrable to responsible authorities and licensing authority, for instance by licence condition allowing authorised officers access to sales accounts)(Station Grill will **NOT** sell alcohol at all and this should make their case **stronger** in the CIZ and be considered as exceptional circumstance)

The following licensing activities are encouraged and valued by the licensing authority: outdoor regulated entertainment, community-based street parties, members clubs, traditional pubs outside the city centre and **non-alcohol led licensable activities, particularly within city centre (which is Station Grill case as a restaurant in the city centre).**

The premises is:

- Non-alcoholic
- Food-focused
- Small in size
- Willing to accept licence conditions
- Committed to hiring trained staff and implementing public safety measures

Given the distinction between this operation and typical late-night venues in the area, I strongly believe that this application **meets the criteria for exceptional circumstances**. Its presence will not increase disorder, and may instead help reduce it.

The statement of licensing policy (SoLP) states that, *'if an application is unlikely to add to the cumulative impact of an area, it may be granted. The impact can be expected to be different for premises with different styles and characteristics'*. **And it does not give to what extent and what percentage, it says unlikely, and we believe that this application will not negatively add to the cumulative impact in the area and that exceptional circumstances do exist.**

Because of Station Grill's exceptional hygiene, unique food offering, community support, and responsible business practices, I firmly believe this application qualifies as a justified exception to the CIZ restrictions.

As you can see that a restaurant without selling alcohol should be granted a license.

Hygiene and Standards Outclass Competitors

Nearby late-night outlets generally do not meet the same standards. For example, the closest has a 3-star hygiene score. Station Grill holds a 5-star rating and is the only local venue offering Egyptian cuisine, giving it a significant advantage.

Actively Supporting Licensing Objectives

The Station Grill team, particularly the manager, has implemented solid measures to meet all four licensing criteria:

A. Preventing Crime and Disorder:

The premises are monitored via CCTV both inside and outside. Incident records are maintained. As a licensed SIA supervisor, the manager can manage crowds and ensure the premises remain secure.

B. Promoting Public Safety:

The premises comply with fire safety and health regulations. All emergency exits are clearly marked, and pathways are unobstructed.

C. Preventing Nuisance to the Public:

Noise is managed through controlled entry. Waste is collected daily, and customers are encouraged to leave in a quiet, respectful manner.

D. Protecting Children from Harm:

All employees are trained to:

- Identify vulnerable persons, whether due to age, intoxication, or substance misuse

- Follow set procedures for conflict handling
- Document and record all training
- Share staff training logs with police or council officials upon request
- Attend refresher sessions every 8 weeks, with all sessions logged and dated

Late-Night Food Offering with Cultural Distinction

Station Grill stands as the only Brighton food venue offering a combination of freshly made Egyptian and Turkish meals available late into the evening for takeaway and delivery, bringing valuable culinary variety to Brighton's night-time economy.

Evident Community Demand

There is significant late-night demand for healthy, hot food, particularly from students, healthcare staff, and workers commuting or finishing shifts. Station Grill is currently the only business capable of fully meeting this demand in the area.

High-Traffic Location Serves the Public

Sussex Police have acknowledged Queens Road as a busy route, especially late at night. Station Grill is ideally situated to serve this traffic and already does so in a safe, orderly fashion.

CIZ Location with Unmatched Safety Measures

Even though the premises lie within the CIZ, they're well-positioned for exemption based on:

- Having an SIA-trained security supervisor on site
- Keeping a detailed incident log
- Enforcing refuse policies
- Zero alcohol sales—significantly reducing disorder risks

No Planning Permission Required for This Use

This application is entirely licensing-related. As a Class E(b) business, Station Grill may serve takeaway, collection, and delivery without needing planning permission—as long as those services are secondary and not the primary focus.

Compliant with the Matrix Principles

The matrix already allows restaurants to stay open until midnight. Because Station Grill doesn't sell alcohol, their request for extended hours is consistent with current policy under managed conditions.

Irrelevance of Crime Statistics

Late-night crime in this zone is mostly alcohol-fuelled. Since Station Grill doesn't sell alcohol and has had zero issues, **it's inappropriate to judge this application using unrelated data.**

Manager Has Proven Late-Night Experience

The manager holds an SIA licence and has over a year of night food service experience, including on West Street. Since managing Station Grill, he has operated without incident, confirming his readiness for late-night trading.

Operation Will Not Add Negative Impact

The venue is food-focused, professionally managed, and runs in a quiet, clean manner. Its continued operation will not worsen crime, public nuisance, or any cumulative concerns.

Exceptional Justification for Licence Approval

This is a clear-cut case of an exceptional venue: no alcohol served, a spotless record, and a highly desired menu. Granting this licence would be a positive deviation from standard rules.

Outstanding Food Safety and Cultural Uniqueness

Station Grill is unmatched in terms of hygiene and culinary offerings. Their 5-star environmental health score and Egyptian-Turkish menu set them apart from all nearby takeaways.

Unfair Licensing Discrepancies

It is concerning that police policies seem to discourage clean new businesses while permitting older outlets—sometimes with poor hygiene—to operate late into the night. This creates a de facto curfew and limits consumer choice.

Inconsistent Treatment Between Businesses

The neighbouring business at 61 Queens Road operates until 3:00 AM. Station Grill, at 62, is denied the same. If the only difference is ownership age, obtaining their license on an early date, or establishment date, then this is unfair and could be discriminatory.

Human Rights and Fair Licensing

The Licensing Policy references the Human Rights Act 1998:

Article 1 of the First Protocol protects the peaceful operation of businesses. Rejecting Station Grill's application under these conditions could violate that right, **especially when the adjacent business immediately next door at 61 Queens Road, enjoys late-night trading. While Station Grill is not allowed to trade on a similar conditions.**

Equal Treatment for New and Old Operators

Every compliant business—regardless of owner age or operating history—deserves the same consideration. Station Grill has proven itself to be responsible, safe, and qualified to operate beyond midnight.

Local Residents Want Broader Choice

Residents living near the restaurant want varied late-night food choices. Denying Station Grill a licence restricts those options and benefits only older venues with legacy licences.

This issue is clearly illustrated by the contrast between 61 and 62 Queens Road. The former is allowed to stay open until 3:00 AM, while the latter (Station Grill) is refused. This creates inequality.

Equal Rights for Fair Business

All businesses should be treated equally under the law. Station Grill is not being given a fair opportunity, despite meeting all expectations and serving the public well.

Community Value and Need

The availability of fresh, healthy, culturally distinctive food late at night is rare. Station Grill fills this gap and enhances Brighton's local food offerings.

Respectful Request for Licence Approval

Considering all these facts, I respectfully ask the Licensing Authority, Sussex Police, and the Court to support and approve Station Grill's Late Night Refreshment Licence. They operate with care, quality, and responsibility.

Final Statement

Station Grill is a responsible, diverse, and essential part of Brighton's food scene. It deserves to have its licence approved to meet the city's growing late-night food needs.

Kind Regards

Appendix E

