

Licensing Panel (Licensing Act 2003 Functions)

Date: **6 October 2025**
Time: **10.30am**
Venue **Virtual – Microsoft Teams**
Members: **Councillors:** Cattell, Parrott and Pickett

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.

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(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 ZAF'RON LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

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Contact Officer: Corinne Hardcastle
Ward Affected: West Hill & North Laine

Tel: 0127329

Date of Publication - Friday, 26 September 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)

Agenda Item
Brighton & Hove City Council

Subject:	Review of a Premises Licence under the Licensing Act 2003
Premises:	Zaf'ron - 99 North Road, Brighton, BN1 1YE
Premises Licence Holder:	Zaf'ron Limited
Date of Meeting:	6 October 2025
Report of:	Corporate Director for City Operations
Contact Officer: Name:	Emily Fountain
Email:	emily.fountain@brighton-hove.gov.uk
Ward(s) affected:	West Hill & North Laine

FOR GENERAL RELEASE

The public are likely to be excluded from the meeting during consideration of this report as it contains exempt information as defined in rule 12 of the Constitution, access to information, category 7. Under the Licensing Act 2003 (Hearings) Regulations, Regulation 14 permits the panel to exclude the public from all or part of a hearing where it considers that the public interest in so doing outweighs the public interest in the hearing taking place in public.

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 To review a Premises Licence for Zaf'ron under the Licensing Act 2003.

2. RECOMMENDATIONS:

- 2.1 That the Panel review the licence granted to the premises known as Zaf'ron under the Licensing Act 2003.

3. CONTEXT/ BACKGROUND INFORMATION & CONSULTATION

- 3.1 Existing licence attached at Appendix A.
- 3.2 Brighton & Hove City Council is both the relevant licensing authority and a responsible authority in respect of any premises and may in its capacity apply under Section 51 of the Licensing Act 2003 for a review of any premises licence in respect of the premises.
- 3.3 An application was received by the Licensing Authority on 13 August 2025 from Sussex Police, to review the licence granted to the premises known as Zaf'ron - 99 North Road, Brighton, BN1 1YE.

- 3.4 The ground for the review relates to the following Licensing objective of the Prevention of Crime and Disorder.

Full details of the grounds for the review are in Appendix B (not for publication) and a copy of the further to evidence from Sussex Police is attached in Appendix B1.

- 3.5 At this hearing the licensing authority must:

- Consider the application made in accordance with Section 51
- Consider any relevant representations
- Take such steps (if any) as are considered appropriate for the promotion of the Licensing objectives. These steps are
 - to modify the conditions of the licence
 - to exclude a licensable activity
 - to remove the designated premises supervisor from the licence
 - to suspend the licence for a period not exceeding 3 months, or
 - to revoke the licence.

And for this purpose, the conditions of a premises licence are modified if any of them are altered, omitted or any new condition is added. It may provide that the modification or exclusion have effect for a specified period not exceeding 3 months. The determination, if not completed at the hearing, shall be within 5 working days of the hearing. Such determinations do not have effect until after the appeal period or, if an appeal is lodged, until after the appeal is disposed of.

Representations received

- 3.6 Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.7 6 representations have been received from Local Councillors, a Brighton MP, Environmental Protection, Immigration and Planning on the grounds of the licensing objectives of the prevention of crime and disorder, public safety, prevention of public nuisance and protection of children from harm supporting the application submitted by Sussex Police seeking the revocation of the licence.
- 3.8 Full details of the representations are attached at Appendix C. Response to the Review from the Premises licence Holder is 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 4 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) Prevention of crime and disorder;
- (b) Public safety;
- (c) Prevention of public nuisance;
- (d) 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.

3.3 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)

Matrix approach for licensing decisions in a Statement of Licensing Policy

	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 www.brighton-hove.gov.uk/licensingact.
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, e.g. 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 of SoLP).

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.
- g.

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

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

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, e.g. in the context of film exhibitions or where adult entertainment is provided). It is intended that the admission of children to premises holding a premises licence or club premises certificate should normally be freely allowed without restricting conditions (unless the 2003 Act itself imposes such conditions or there are good reasons to restrict entry or to exclude children completely).

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.

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.

8.2 Other regulatory regimes

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

Health and Safety

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

Fire Safety

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

Noise

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

Equality Act 2010

The Public Sector Equality Duty obliges public authorities to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, and to advance equality of opportunity and foster good relations between persons who share protected

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

Community relations

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

Anti-Social Behaviour, Crime and Policing Act 2014

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

Litter and Smoking

CityClean contractors have Clean Neighbourhoods powers to enforce premises operators' responsibilities to keep frontages clear of litter.

Gambling Act 2005

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

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

9 Reviews

9.1.1 Reviews represent a key protection for the community. Where the licensing authority considers action necessary under its statutory powers it will take necessary steps to support the licensing objectives. Action following review will be informed by licensing enforcement policy – Appendix B.

9.1.2 Where style of operation of a premises leads to applications concerning likelihood of racist, religiously motivated, homophobic or transphobic crimes or incidents, the review process should also support the community safety policy. Action should be proportionate and licences would normally be suspended or revoked in these circumstances to deter further incidents.

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: 26/09/2025

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

Date: 26/09/25

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 – Part A of Premises Licence
2. Appendix B – Review Application (**not for publication**).
3. Appendix B1 – Further to evidence from Sussex Police
4. Appendix C – Representations
5. Appendix D – Premises Licence Holder Response to Review
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, December 2022.

Public Health Framework for Assessing Alcohol Licensing – January 2022.

Background Documents

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



Schedule 12

Part A

Regulation 33, 34

**Premises Licence
Brighton and Hove City Council**

Premises Licence Number

1445/3/2024/04125/LAPRMV

Part 1 – Premises Details

Postal address of premises, or if none, ordnance survey map reference or description, including Post Town, Post Code

Zaf'ron
99 North Road
Brighton
BN1 1YE

Licensable activities authorised by the licence

Late Night Refreshment

Times the licence authorises the carrying out of licensable activities

Late Night Refreshment

Every Day: 23:00 - 03:00 Outdoors - Takeaways and Deliveries only

The opening hours of the premises

Every Day: 12:00 - 03:00

Where the licence authorises supplies of alcohol whether these are on and / or off supplies

N/A

Part 2

Name, (registered) address, telephone number and email (where relevant) of holder of premises licence

Zaf'ron Limited
37 Chelwood Close,
Brighton,
BN1 8FN

Registered number of holder, for example company number, charity number (where applicable)

Registered Business Number: 14238128

Name and address of designated premises supervisor where the premises licence authorises for the supply of alcohol

N/A

Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol

N/A

APPENDIX A



Annex 1 - Mandatory conditions

S 21; mandatory condition: door supervision

1. Where a premises licence includes a condition that at specified times one or more individuals must be at the premises to carry out a security activity, each such individual must:
 - a) Be authorised to carry out that activity by a licence granted under the Private Security Industry Act 2001: or
 - b) Be entitled to carry out that activity by virtue of section 4 of the Act.
2. But nothing in subsection (1) requires such a condition to be imposed:
 - a) In respect of premises within paragraph 8 (3)(a) of Schedule 2 to the Private Security Industry act 2001 (c12) (premises with premises licences authorising plays or films): or
 - b) In respect of premises in relation to:
 - I. Any occasion mentioned in paragraph 8(3)(b) or (c) of that Schedule (premises being used exclusively by club with club premises certificate, under a temporary event notice authorising plays or films or under a gaming licence) or
 - II. any occasion within paragraph 8(3)(d) of that Schedule (occasions prescribed by regulations under that Act).
3. For the purposes of this section:
 - a) “Security activity” means an activity to which paragraph 2(1)(a) of that Schedule applies, and which is licensable conduct for purposes of that Act, (see Section 3(2) of that Act) and
 - b) Paragraph 8(5) of that Schedule (interpretation of references to an occasion) applies as it applies in relation to paragraph 8 of that Schedule.

Annex 2 – Operating Schedule

In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

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. 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 and Disorder:

3. 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.

APPENDIX A



4. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight. The door staff will be on duty from midnight until close.
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 backup 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.

Public Safety: None

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

Protection of Children from Harm:

11. a) 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.

- b) 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.
- c) 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.

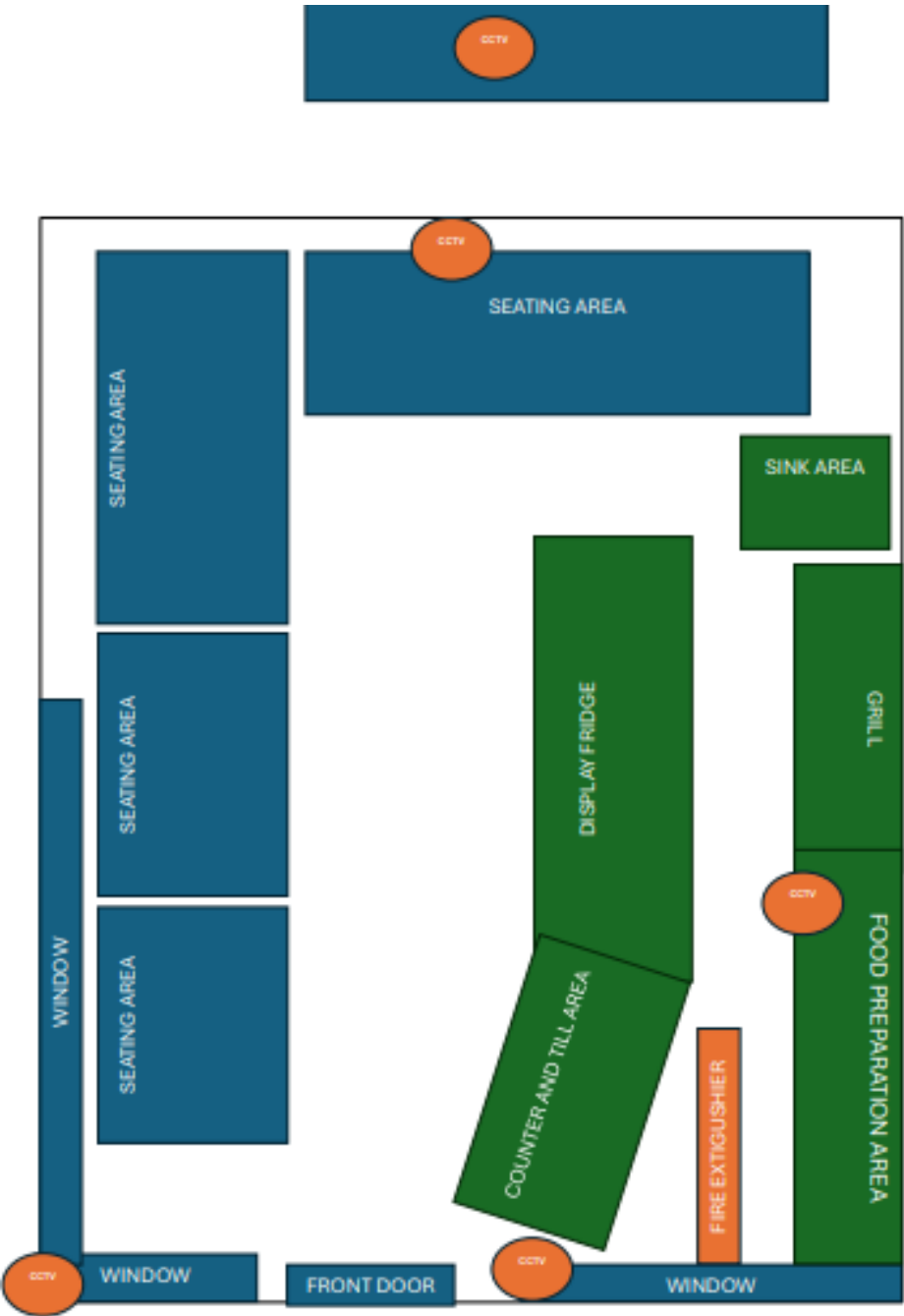
12. No Under 18's are allowed on premises after 23:00 unless they are supervised/accompanied by a responsible adult.

Annex 3 – Conditions attached after a hearing by the licensing authority – 20 August 2024.

13. The operation of the premises between 23.00 and 03.00 every day is to be for takeaway and deliveries only



Annex 4 – Plans





Zaf'ron, North Road, Brighton - Further to Evidence

Date of Submission: 03rd September 2025

GBH Investigation update:

Since the initial review was submitted, one of the males arrested on the night of the offence, 02nd August 2025 has been released with no further action being taken against them. The other two males remain on police bail under investigation. An additional male was [REDACTED]. He has been interviewed and now on police bail under investigation.

Prior to the licensing hearing, we will conduct a full review of everything submitted and confirm to the local authority areas that we feel it's appropriate to conducted in private, excluding press and public. We will do our utmost to keep this to a minimum whilst ensuring a fair outcome for all involved by not jeopardising a live investigation.

We are expecting to submit further evidence that we will refer to at the hearing. We will ensure, if this is the case, to get this submitted in plenty of time prior to the hearing so that all parties have time to review it.

Comments relating to representation letter submitted to the local authority on 22nd August 2025 by Norulah Habibi, Zaf'ron:

There has been a clear change in Norulah Habibi's outlook regarding the actions [REDACTED] that led to this review being called by Sussex Police.

Key points we wish to bring to the panel's attention:

[REDACTED]

- Norulah HABIBI states they cooperated fully with the police investigation which is not factually true. Mr HABIBI himself confirmed that he withheld providing CCTV to the investigating officers and that admission backs up the attending officers suspicion of this.
- He acknowledges the unacceptable way that police and medical assistance was not called for by staff.
- Regarding the CCTV time stamp, he confirms that the CCTV was incorrect regarding this, but it was corrected following a licensing inspection in January 2025. But during the investigation of the incident on 02nd August 2025 it confirms that the CCTV time stamp was still incorrect, and a breach was issued.
- Alleged drug use. Sussex Polcie have not said that the venue was being used for the consumption of drugs.
- Regarding security, the condition on the licence states they should always have SIA on duty at the venue when it is opening beyond midnight. The statement within the documentation we are referring



to leads us to believe this condition has not been adhered to. Further down in the document it mentions that SIA is no longer an informal or ad-hoc practice, it should not have been in the first place.

- In early 2025 they have put steps in to address the noise complaints however the police have continued to receive complaints linked to this venue.
- Just like the comment around drugs, unsure where the allegation of “Repeated Offender” refers to from Police. We have made no such comments in our review document.
- BCRP - Norulah HABIBI states that soon after having the licence granted, they joined the BCRP. The BCRP is a requirement under the licence conditions. The licence was granted on 29th August 2024 and following an inspection by us in January 2025 where membership had not been arranged, it was confirmed by BCRP on 27th January 2025 they had eventually joined. We would argue that 5 months is not considered as “soon after” and we believe the membership was only taken up following our inspection in January.

The proposed closure of 01:00:

Although we acknowledge this would reduce some of the public nuisance risks, we still have concern over the current and previous management of the venue and their ability to promote the licensing objectives. Much has been promised in the documentation submitted but the majority of this should have been in place already. Some of it confirms further licence breaches and goes against what Norulah HABIBI has stated in the past where originally, he was taking no responsibility [REDACTED] on that night. There is also the serious matter of withholding / delaying providing evidence namely CCTV.

Timeline of dealings with the venue.

17th November 2023 – 23:49:

Venue attended by police and a colleague from Brighton & Hove City Council Licensing as noticed venue was open and we had knowledge that there was no premises licence in place. Premises now trading as Zaf'ron after being taken over mid-Summer 2023. When entering we witnessed food out ready to cook, orders coming in on delivery apps and 2 customers waiting for food they had ordered. 4 staff members on site. Asked to talk to the owner who made himself known. He confirmed he was aware he had no premises licence, but it was a busy night, and they had not noticed the time. He made out this was the first time this had happened. We then pointed out the printed food menus on the counter which advertised opening hours of until Midnight. This opening time was also displayed on the Just Eat app, Google and on their Facebook page. We asked a local business if they had seen the venue open beyond 23:00 previously and they confirmed they had and themselves ordered food after 23:00. A warning letter dated 21st November 2023 was emailed on that date at 13:29 for conducting unlicensed activities – Late Night Refreshments. We note that at this time the director was Ahmed Nasser and it was emailed to himself and Norulah Habibi as advised both individuals were joint owners.



27th November 2023 – 16:27:

Ahmed Nasserri emailed police to ask about applying for a Late-Night Refreshment Licence. We gave advice around the Statement of Licensing policy and that we would look for the application to be heard before a licensing panel.

05th December 2023:

Check of online sites to ensure closing times had been updated further to our visit of 17th November 2023 and found that neither Facebook, Google nor Just Eat had been updated.

23rd December 2023 – 23:05:

Venue attended by police and found around 6 customers inside the venue seated and eating. Premises lights all on. As soon as officers entered the staff went to turn the lights off and promoted their customers to pay. Attending officers felt this only occurred due to their attendance. The owner advised officers that he was going to apply for a licence as delivery forms a large part of their business late at night. This adds further evidence that venue has been possibly operating beyond 23:00 for them to know it's worth opening later.

07th February 2024:

Check of online sites to ensure closing times had been updated further to our visit of 17th November 2023 found that both Facebook and Just Eat still had not been updated.

18th June 2024

New premises licence application submitted by Rafiullah Khan, company director. Police submitted a representation against this application on the grounds of crime & disorder associated with late night venues and additionally, public nuisance around the negative impact a late-night venue in a residential area could have.

Hearing was held on 20th August 2024 via Teams with the result made public on 29th August 2024. The application was granted by the licensing panel. Conditions applied were limited so Sussex Police submitted an appeal to have more robust conditions put on.

03rd August 2024 Brighton & Hove Pride Weekend – 23:50:

Venue attended by police and on approaching staff hurriedly ran to close the shop insisting they had closed already. Officers noticed that food could be seen being cooked on the grill and sign on the door indicating they were still open. A warning letter dated 08th August 2024 was emailed on that same date at 13:13 for conducting unlicensed activities – Late Night Refreshments. This was sent to Rafiullah Khan, company director at the time. Although they had applied for a licence, the hearing for it had not taken place so at this time, no licence was in operation.



29th August 2024:

New licence granted and can be operated under permitting Late Night Refreshments until 03:00 every day. From 23:00 this is for takeaway and delivery only.

15th September 2024 – 06:12:

Call in to police advising that the venue is attracting large amounts of people especially at the weekends causing a lot of noise including shouting, swearing and playing loud music.

09th January 2025 – 15:52:

Joint visit with Brighton & Hove City Council Licensing to conduct a full licensing inspection since the grant of a new Late Night Refreshments Licence. On arrival they met with Rafiullah KHAN who asked if this was regarding the recent noise complaint. He was advised no but we were there to conduct a licensing inspection. The inspection flagged up several areas of non-compliance and a breach was issued and emailed to Rafiullah KHAN on 10th January 2025 at 16:38:

- CCTV – storing for 30 days instead of 31 days.
- SIA Door staff – they have one on duty at the required times but unsure what company they are from.
- SIA Risk Assessment – unable to produce one.
- MUS Contract – contract not in place.
- BCRP Membership – was not a member.
- Incident log – no incident log in place.
- Ensure delivery vehicles parked legally – At time of visit moped parked outside on double yellow lines.
- Leave quietly notices – none on display.
- Staff training including conflict management – no training conducted or able to evidence.

27th March 2025 – 09:30:

One of the Neighbourhood PCSO's approached Licensing about noise complaints they are receiving regarding Zaf'ron, North Road. Advised them to direct these to Brighton & Hove City Council Environmental Protection Department to follow up.

09th April 2025

Report to police around noise issues linked to vehicles coming and going at this premises in the early hours.

02nd June 2025 – 23:34:

Call in to police around noise issues coming from the premises. Premises was having building work and at the time of the call the call handler could hear the noise over the phone.

03rd June 2025 – 05:45:

Off duty Licensing officer was walking along North Road Brighton and was distracted by loud building work type of noise which was odd for this time of the morning. Noticed it was coming from Zaf'ron.



21st June 2025 – 01:26:

Noise complaint to police regarding groups outside Zaf'ron, slamming car doors and generally being loud.

13th July 2025 – 23:44:

Ongoing noise issues reported to police involving large groups of taxi drivers and moped riders hanging around outside Zaf'ron at night causing noise. Complainant has also reported this to Brighton & Hove City Council.

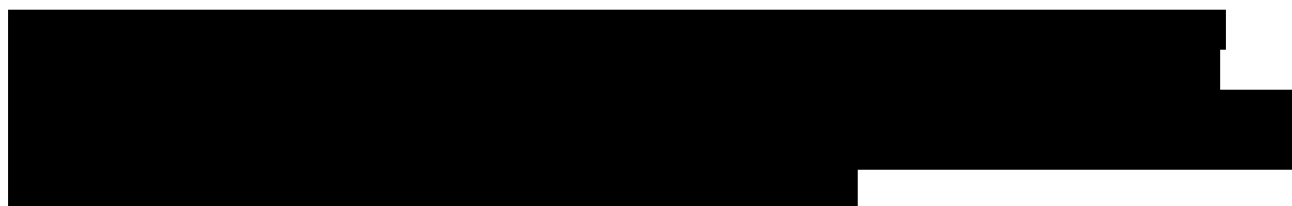
01st August 2025 – 02:28:

Please refer to the initial review documentation.

02nd August 2025 – 03:30:

Please refer to the initial review documentation.

05th August 2025 – 09:58:



During one of the hearings on 11th August 2025, it is noted that when discussions were being had with Norula HABIBI, the company director, around CCTV. He confirmed that he gave officers untrue information regarding having CCTV and or if the CCTV was working. Confirming the officer's suspicions, as set out in detail within the initial review documentation, that he was not being truthful.

13th August 2025 – 13:41:

Sussex Police applied for a Premises Licence Review of Zaf'ron, 99 Noth Road, Brighton. This was validated by the local authority on the same day at 15:55.

18th August 2025:

Following the hearing of 11th August 2025, it came to light that the licence holder, Norula HABIBI was in breach of his premises licence regarding CCTV. A breach was issued and emailed to him on 18th August 2025 at 12:26.



Directorship of Zaf'ron Ltd – Company Number 14238128

Premises Licence Holder of Zaf'ron, 99 North Road, Brighton

15th July 2022 Zaf'ron Limited incorporated
15th July 2022 Faisal BABOUKARKHEL appointed as a director
15th July 2022 Mustafa UMARI appointed as a director
02nd Sept 2022 Faisal BABOUKARKHEL resigned as a director
02nd Sept 2022 Mustafa UMARI resigned as a director
02nd Sept 2022 Norula HABIBI appointed as a director
02nd Sept 2022 Mohammad BABAK appointed as a director
10th Jan 2023 Mohammad BABAK resigned as a director
27th Feb 2023 Faisal BABOUKARKHEL appointed as a director
19th Mar 2023 Faisal BABOUKARKHEL resigned as a director
19th Mar 2023 Mohammad BABAK appointed as a director
17th May 2023 Faisal BABOUKARKHEL resigned as a director
25th Aug 2023 Ahmed NASSERI appointed as a director
12th Jan 2024 Ahmed NASSERI resigned as a director
22nd Jan 2024 Norula HABIBI resigned as a director
22nd Jan 2024 Rafiullah KHAN appointed as a director
06th Mar 2024 Mohammad AMINI appointed as a director
15th Mar 2024 Mohammad AMINI resigned as a director
01st Feb 2025 Rafiullah KHAN resigned as a director
01st Feb 2025 Norulah HABIBI appointed director

Directorship of Zafron Crawley Ltd – Company Number 15437053

Listed company under food registration wit Crawley Borough Council.

23rd January 2024 Zafron Crawley Ltd incorporated
23rd January 2024 Rafiullah Habibi appointed as a director
21st March 2025 Rafiullah Habibi resigned as a director
21st March 2025 Norulah Habibi appointed as a director

APPENDIX C

REP A

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

Date: 19 August 2025
Our 2025/02177/LICREP/EH
Ref: donna.lynsdale@brighton-hove.gov.uk
e-mail: hove.gov.uk

Dear Emily Fountain

Licensing Act 2003

**Representation in support of an application by Sussex Police seeking a review of the Premises
License - 2025/06905/LAREV
Zaf'ron Limited, 99 North Road, Brighton BN1 1YE**

I am making a representation on behalf of the Council's Licensing Team, in their capacity as a responsible authority, in relation to the above application made by Sussex Police seeking to review the Premises Licence for Zaf'ron, 99 North Road, Brighton BN1 1YE.

This representation is made as the Licensing Team have concerns that the licensing objective of the Prevention of Crime and Disorder and the Prevention of Public Nuisance are not being upheld.

The history of this matter is explained in more detail in the application of Sussex Police.

On 17 November 2023 at 23:49, accompanied by Police Licensing we visited the premises. At the time of this visit the premises was open and taking orders via delivery websites without a Late-Night Refreshment Licence. On 23 November 2023 I wrote to the premises and issued them a warning for trading without a Late-Night Refreshment Licence. A copy of my email is attached as Appendix A.

On 18 June 2024, an application was received from Zaf'ron Limited applying for a new premises licence for Late-Night Refreshment.

On 3 August 2024, during Pride weekend, a visit was carried out by Sussex Police, where they found the premises open and trading without a LNR licence. On 13 August, I sent a further warning letter for carrying out unauthorised licensable activities without a valid premises licence. A copy of my email is attached as Appendix B.

On 20 August 2025 a licence panel hearing was held following representations on behalf of the Licensing Team and by Sussex Police Licensing regarding the application made by Zaf'ron Ltd. A copy of the Decision letter is attached as Appendix C.

Following the grant of the premises licence and a subsequent appeal, conditions were added to the premises licence.

Telephone: 01273 290000
www.brighton-hove.gov.uk

On 9 January 2025, accompanied by Police Licensing, I visited the premises and carried out a full licensing inspection. On 13 January 2025, I wrote to the PLH detailing the breaches found. A copy of my email is attached as Appendix D.

On 6 February 2025, I wrote to the PLH again following complaints received from local residents and including evidence that they were trading past their permitted hours. A copy of my email is attached as Appendix E (which includes a response from the PLH and further email from myself).

On 11 February 2025, I resent my email to the current PLH as I was informed that on 1 February 2025, a change of Director was updated on Companies House. A copy of this email is attached as Appendix F (which includes follow up emails and response from the PLH).

On 9 June 2025, I wrote to the PLH again following complaints received from local residents. A copy of this email is attached as Appendix G (which includes a response from the PLH).

These premises fall within the Licensing Authority's Cumulative Impact Area (CIZ), which was adopted to give greater power to control the number of licensed premises within the city's centre. The SPCI was introduced 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 effect of the SPCI is that applications for variations of premises licences, which are likely to add to the existing Cumulative Impact, will be refused following relevant representations. The applicant can rebut this presumption of refusal if they can show that their application will have no negative cumulative impact on licensing objectives, including prevention of crime and disorder and public nuisance.

It is my opinion that this premises has clearly demonstrated that they are not operating to the conditions attached to the premises licence. Continue to trade past their permitted hours and based on the number of complaints received are causing a public nuisance to the surrounding residents. I have no confidence in the management of the running of the premises.

The Licensing Team fully support the application submitted by Sussex Police and invite the panel to revoke the premise licence.

Yours sincerely

REDACTED

Donna Lynsdale
Licensing Officer
Licensing Team

Appendix A – Email sent on 23 November 2023.

Appendix B – Email sent on 13 August 2024.

Appendix C – Copy of Decision letter following grant of premises licence.

Appendix D – Email sent on 13 January 2025 following licensing inspection.

Appendix E – Email sent on 6 February 2025 following complaints received and evidence of trading past permitted hours.

Appendix F – Email sent 11 February 2025 to current PLH.

Appendix G – Email sent 9 June 2025 following further complaints received.

REP A - Appendix A

From: Donna Lynsdale

Sent: Thursday, November 23, 2023 11:29 AM

To: REDACTED; REDACTED

Cc: Brighton.Licensing@sussex.police.uk

Subject: Unauthorised Licensable Activities - Zaf'Ron, 99 North Road, Brighton BN1 1YE - 2023/02848/LICENQ/EH

Importance: High

Dear REDACTED and REDACTED

Licensing Act 2003 - Unauthorised Licensable Activities
Zaf'Ron, 99 North Road, Brighton BN1 1YE

I am writing to you following a visit to your premises accompanied by Mark Thorogood, Police Licensing on Friday, 17 November 2023 at 23:49.

At the time of our visit, your premises was open and taking orders via delivery websites without a Late-Night Refreshment Licence.

Supply of Late-Night Refreshment is a licensable activity under the Licensing Act 2003. Any hot food or hot drink sold between 11pm and 5am is classed as the licensable activity of supply of Late-Night Refreshment.

It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

(1) A Person commits an offence if –

(a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b) he knowingly allows a licensable activity to be carried on.

(4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

If you continue to trade without a Late-Night Refreshment Licence past 11pm, then this may be taken into consideration if you submit any application in the future.

Please note this Authority and Sussex Police have officers monitoring the City both day and night and we will be monitoring the premises. If it is witnessed that your premises is carrying out further unauthorised licensable activities, then enforcement action will be taken.

I have copied Police Licensing into this email.

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

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

Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP

T REDACTED | **REDACTED**

REP A - Appendix B

From: Donna Lynsdale

Sent: Tuesday, August 13, 2024 10:06 AM

To: **REDACTED**

Cc: Brighton.Licensing@sussex.police.uk

Subject: Unauthorised Licensable Activities - Zaf'Ron, 99 North Road, Brighton BN1 1YE - 2024/02010/LICENQ/EH

Importance: High

Dear **REDACTED**

Licensing Act 2003 - Unauthorised Licensable Activities Zaf'Ron, 99 North Road, Brighton BN1 1YE

I am writing to you in your capacity as the owner and sole Director Zaf'ron Ltd of the above premises.

I have been informed that Sussex Police visited your premises on 3 August 2024 at 23:50. At the time of this visit, they advised that on approaching the premises staff were seen to be rushing to close the shop insisting that they had closed already. However, they could see that food was still being cooked on the grill and the sign on the door indicating the premises was open.

Supply of Late-Night Refreshment is a licensable activity under the Licensing Act 2003. Any hot food or hot drink sold between 11pm and 5am is classed as the licensable activity of supply of Late-Night Refreshment.

It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

(1) A Person commits an offence if –

(a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b) he knowingly allows a licensable activity to be carried on.

(4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

In light of the above, I am issuing you with a **Warning**.

The above is very disappointing as previous warnings have been sent for trading without a Late Night-Refreshment Licence. Please be advised that I will be submitting a copy of this email and requesting that it is taken into consideration at the licensing hearing on 20 August 2024 to decide on your application.

I have copied Police Licensing into this email.

Please acknowledge receipt of this email. When responding please reply to all.
Yours sincerely

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

Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP

T REDACTED | [REDACTED](#)

REP A - Appendix C

Licensing Panel hearing held on Tuesday 20 August 2024 virtually in respect of the application for a Late-Night Refreshment Licence for Zaf'ron, 99 North Road, Brighton, BN1 1YE

The panel has read all the papers including the report and relevant representations and listened to the submissions put forward at the hearing. The panel has also had regard to the council's Statement of Licensing Policy (SOLP) and the section 182 Licensing Act 2003 statutory guidance.

The application is for a new Late Night Refreshment Licence authorising the sale of hot food and drink to members of the public between 23.00 and 03.00 hours every day.

The premises are situated within the Cumulative Impact Area (CIA). This is an area where the council 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 an approach to "Cumulative Impact" is necessary as part of its SOLP. That approach provides that applications for new or varied licences in the CIA which are likely to add to the existing Cumulative Impact will be refused following relevant representations. The presumption of refusal can be rebutted if the applicant can show that their application will have no negative Cumulative Impact.

A "matrix" approach to licensing decisions has been adopted by the council in its SOLP. It sets out a framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success to any applicant. The matrix suggests that Late Night Refreshment Licences will not be granted in the CIA.

Two representations were received from responsible authorities, the Police and Licensing Authority setting out concerns relating to the Prevention of Crime and Disorder, Public Safety, the Prevention of Public Nuisance and Cumulative Impact.

The Police representative amplified the Police objection. He provided details of the closing time of other licensed premises in the vicinity and stressed that 3am was significantly later. There were no other late-night takeaways in the immediate vicinity. Late night trading will impact on residents, both through delivery vehicle movements and by attracting people to the area who would otherwise not be there. Based on their interactions to date with the applicant, the Police had concerns about management's attitude.

The Licensing Authority representative also expanded upon their objection and shared the Police's concerns about the management of the premises.

We heard from the sole director of the applicant company. In their presentation, and in answer to our questions we were told that:

- *The application for extended hours was in response to a demand from regular customers.*
- *The company did not employ sufficient staff to operate as a restaurant until 3am. The plan was to operate as a takeaway and provide a delivery service. He would use not only his employees for this, but also third-party delivery operators, such as Uber and Deliveroo. He did not wish to pursue extended hours at Christmas and New Year.*
- *He only became a director of the company in January 2024 and therefore could not comment on the unauthorised trading in November 2023.*
- *With regard to the alleged unauthorised trading in August 2024, that was on Pride weekend. The premises had been busy, and at the time of the Police visit, staff were cooking food for themselves and not the public.*
- *He was not in a position to change the trading hours on Facebook. That was controlled by previous directors of the company.*
- *There had been no complaints from local residents about the operation of the premises, nor any reported crime.*
- *The director was an experienced SIA registered door supervisor, capable of de-escalating problem behaviour, and of training staff to do the same. He intended to be at the premises as much as possible and would have an agreement with a security company if he was not.*

The panel has considered this application on its merits. We note the policy objections to the application – both the CIA and Matrix, but we are particularly struck by the fact that there are no other late- night takeaways in the immediate area, which is somewhat unusual. No residents have objected to the application, and apart from the out of hours trading, no crime has been associated with the premises. The application does not include the sale of alcohol. We found the director's explanation of the late hours for the premises on Facebook credible, together with his explanation for the apparent breach of the licensing hours over the Pride weekend. The measures proposed in the operating schedule, appearing as Appendix A in the agenda on page 25, propose a number of measures to address any public nuisance and crime and disorder concerns.

They include a Door Supervisor, CCTV and signs requesting patrons to respect the needs of neighbours. We do not believe that the application will add to the issues associated with cumulative impact.

The application is therefore granted with:-

- i) A condition limiting the operation of the premises between 23.00 and 03.00 every day to takeaway and deliveries only.
- ii) conditions consistent with the operating schedule.

The Panel believes that the above conditions are appropriate for the promotion of the licensing objectives.

The minutes of the panel will be available on the Council's website under the rubric 'Council and Democracy'. A webcast of the meeting is also available.

REP A - Appendix D

From: Donna Lynsdale

Sent: 13 January 2025 14:52

To: REDACTED

Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>

Subject: Za'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Importance: High

Dear REDACTED

Licensing Act 2003 – Breach of Conditions

Za'ron, 99 North Road, Brighton BN1 1YE

Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

On Thursday, 9 January 2025 at 15:52, accompanied by my colleagues Hannah Staplehurst and PC Wade, we visited your premises and carried out a full licensing inspection. At time of this visit we spoke with 'REDACTED'.

Below are our findings and details of breaches of your premises licence conditions:

Annex 2 - Conditions consistent with the Operating Schedule:

In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

Prevention of Crime and Disorder:

3. 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.

The CCTV was only storing for 30 days and not 31 days in accordance with the above condition. The time showing was one hour ahead. The staff member was unable to operate the system until they spoke with yourself to obtain the password.

- 4. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight. The door staff will be on duty from midnight until close.

We were informed that you have an SIA licensed door staff, however the staff member did not know if they were independent or supplied by a door supervisor company.

- 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.

You did not have an SIA risk assessment available at the time of our visit.

- 6. At all times the premises is open to the public, the management will contract the backup 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.

At the time of our inspection, you did not have an MSU contact.

- 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.

At the time of our inspection, you did not have a membership with BCRP.

- 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.

At the time of our visit the staff member was unable to show us an incident log. The incident logbook should be inspected and signed off by a manager at least once a month.

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.

Following the licensing inspection, we witnessed one of your delivery drivers had left a Moped on double yellow lines.

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

There were no notices on display.

Protection of Children from Harm:

11. a) 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.

- b) 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.

- c) 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.

There were no training records available at the time of our visit.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

- (1) A Person commits an offence if –

(a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b) he knowingly allows a licensable activity to be carried on.

- (4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

It was very disappointing that despite providing you with all the relevant documentation to comply with your premises licence, you have chosen not to use them and breaching your licence conditions.

Also, this authority is still receiving complaints from residents in the surrounding area. The residents are alleging that they are being disturbed on a regular basis from loud music coming from your premises. Also, from your customers parking on double yellow lines and that you are trading past your permitted times and causing a public nuisance.

I note that my colleague previously emailed you regarding complaints that we have received. To date you have not acknowledged her email or responded.

We will be carrying out a follow up visit in the near future. Please ensure the above has been rectified and complied with.

I have copied into this email Police Licensing and Chinwe Ihemefor (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | **REDACTED**

Appendix E

From: Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk>
Sent: 06 February 2025 12:18
To: 'REDACTED' <REDACTED >
Cc: 'Brighton.Licensing@sussex.police.uk' <Brighton.Licensing@sussex.police.uk>; Chinwe Ihemefor <REDACTED>
Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Hi **REDACTED**

I can assure you that it is not a misunderstanding.

As provided below the dates and times that I have given all evidenced to show that the premises is trading past their permitted hours.

Please be aware that if you continue to trade past your permitted hours, enforcement action will be taken.

Regards

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | **M REDACTED** | **REDACTED**

From: REDACTED

Sent: 06 February 2025 12:08

To: Donna Lynsdale

Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor

Subject: Re: Za'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Hi Donna. I hope you're doing good. I just received your email stating that we have been trading past 3 am which i believe is a misunderstanding and i am sure we have never traded past the closing time. Whatever evidence you think you have i am ready to go through it with you. Thank you.

On 6 Feb 2025, at 11:54 am, Donna Lynsdale REDACTED wrote:

Dear REDACTED

Licensing Act 2003 – Breach of Conditions

Za'ron, 99 North Road, Brighton BN1 1YE

Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

Following on from my previous email sent to you on 13 January 2025, where I advised that we had received complaints from residents in the surrounding area. Alleging that they are being disturbed on a regular basis from loud music coming from your premises. Also, from your customers parking on double yellow lines and that you are trading past your permitted times and causing a public nuisance. (See copy of email below).

I now advise that I have evidence that you have been trading past your permitted hours. The evidence shows that on 22 January 2025 at approximately 03:57 and 1 February 2025 at approximately 03:59.

Below are the details of breaches of your premises licence:

Times the licence authorises the carrying out of licensable activities

Late Night Refreshment

Every Day: 23:00 - 03:00 Outdoors - Takeaways and Deliveries only

The opening hours of the premises

Every Day: 12:00 - 03:00

As stated above, you have been trading past your permitted licensable activity times.

Annex 2 – Operating Schedule

In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

Prevention of Crime and Disorder:

4. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight. The door staff will be on duty from midnight until close.

On both occasions you did not have SIA on the premises in accordance with the above condition.

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.

On 1 February 2025, a motorcycle delivery driver was parked on double yellow lines. This is a breach of the above condition.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislation states that:-

- (1) A Person commits an offence if –
 - (a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or
 - (b) he knowingly allows a licensable activity to be carried on.
- (4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

The above is extremely disappointing, especially as I had previously highlighted that we had received complaints that you are trading past your permitted hours.#

As a result of the above I am issuing you with a **Warning**.

I have copied into this email Police Licensing and Chinwe Iheme for (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services

Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP

T REDACTED | REDACTED

From: Donna Lynsdale

Sent: 13 January 2025 14:52

To: 'REDACTED' <REDACTED>

Cc: Brighton.Licensing@sussex.police.uk; Chinwe Iheme for <REDACTED>

Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Importance: High

Dear REDACTED

Licensing Act 2003 – Breach of Conditions

Zaf'ron, 99 North Road, Brighton BN1 1YE

Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

On Thursday, 9 January 2025 at 15:52, accompanied by my colleagues Hannah Staplehurst and PC Wade, we visited your premises and carried out a full licensing inspection. At time of this visit we spoke with 'REDACTED'.

Below are our findings and details of breaches of your premises licence conditions:

Annex 2 - Conditions consistent with the Operating Schedule:

In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

Prevention of Crime and Disorder:

1. 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.

The CCTV was only storing for 30 days and not 31 days in accordance with the above condition. The time showing was one hour ahead. The staff member was unable to operate the system until they spoke with yourself to obtain the password.

2. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight. The door staff will be on duty from midnight until close.

We were informed that you have an SIA licensed door staff, however the staff member did not know if they were independent or supplied by a door supervisor company.

3. 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.

You did not have an SIA risk assessment available at the time of our visit.

4. At all times the premises is open to the public, the management will contract the backup 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.

At the time of our inspection, you did not have an MSU contact.

5. 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.

At the time of our inspection, you did not have a membership with BCRP.

6.
 - 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.

At the time of our visit the staff member was unable to show us an incident log. The incident logbook should be inspected and signed off by a manager at least once a month.

Prevention of Public Nuisance:

7. 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.

Following the licensing inspection, we witnessed one of your delivery drivers had left a Moped on double yellow lines.

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

There were no notices on display.

Protection of Children from Harm:

9.
 - a) All staff will be trained in:

1. 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.
2. Conflict management.

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

- b) 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.
- c) 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.

There were no training records available at the time of our visit.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislation states that:-

- (1) A Person commits an offence if –
 - (a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or
 - (b) he knowingly allows a licensable activity to be carried on.
- (4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

It was very disappointing that despite providing you with all the relevant documentation to comply with your premises licence, you have chosen not to use them and breaching your licence conditions.

Also, this authority is still receiving complaints from residents in the surrounding area. The residents are alleging that they are being disturbed on a regular basis from loud music coming from your premises. Also, from your customers parking on double yellow lines and that you are trading past your permitted times and causing a public nuisance.

I note that my colleague previously emailed you regarding complaints that we have received. To date you have not acknowledged her email or responded.

We will be carrying out a follow up visit in the near future. Please ensure the above has been rectified and complied with.

I have copied into this email Police Licensing and Chinwe Ihemefor (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | REDACTED

REP A - Appendix F

From: REDACTED

Sent: 26 February 2025 17:22

To: REDACTED <REDACTED>; Donna Lynsdale <REDACTED>

Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>

Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

This email originates from outside of Brighton & Hove City Council. Please think carefully before opening attachments or clicking on links.

Hi dear sir/Madam
Yes I acknowledge receipt
Manana thanks

Sent from [Outlook for iOS](#)

From: REDACTED

Sent: Wednesday, February 26, 2025 5:08:46 PM

To: Donna Lynsdale <REDACTED>

Cc: REDACTED <REDACTED>; Brighton.Licensing@sussex.police.uk
<Brighton.Licensing@sussex.police.uk>; Chinwe Ihemefor <REDACTED>

Subject: Re: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Hi Dona! I just spoke to REDACTED and he said I can't see any email in the inbox.
This is his details
Phone : + REDACTED
Email : REDACTED

On 26 Feb 2025, at 4:42 pm, Donna Lynsdale <REDACTED> wrote:

Dear REDACTED

Following on from my emails sent on 11 February 2025 and 18 February 2025, I note that you have not acknowledged receipt.

Please can you do so by Friday, 28 February 2025, replying to all.

If I do not get an acknowledgement, I need to advise you that further enforcement action will be considered.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | REDACTED

From: Donna Lynsdale
Sent: 18 February 2025 16:32
To: REDACTED
Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>; 'r REDACTED' <REDACTED>
Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH
Importance: High

Dear REDACTED

Following on from my email sent on 11 February 2025, I note that you have not acknowledged receipt.

Please can you so, replying to all.

Many thanks

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | REDACTED

From: Donna Lynsdale
Sent: Tuesday, February 11, 2025 12:40 PM
To: REDACTED
Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>; 'REDACTED <REDACTED>
Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH
Importance: High

Dear REDACTED

I have been informed that as of the 1 February 2025, you have once again been appointed as the sole director of 'Zaf'ron Ltd' company registered number: 14238128.

Please see below warning sent on the 6 February 2025 to REDACTED regarding ongoing complaints and breaches of the above premises licence.

Once you have read the contents of my email, can you please acknowledge receipt. When responding please reply to all.

I have copied into this email Police Licensing, Chinwe Ihemefor (Environmental Protection) and REDACTED.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T 01273 292494 | donna.lynsdale@brighton-hove.gov.uk

From: Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk>
Sent: 06 February 2025 12:18
To: REDACTED <REDACTED>
Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>
Subject: RE: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

Hi REDACTED

I can assure you that it is not a misunderstanding.

As provided below the dates and times that I have given all evidenced to show that the premises is trading past their permitted hours.

Please be aware that if you continue to trade past your permitted hours, enforcement action will be taken.

Regards

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | M REDACTED | REDACTED

From: REDACTED <REDACTED>
Sent: 06 February 2025 12:08
To: Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk>
Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>
Subject: Re: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH

This email originates from outside of Brighton & Hove City Council. Please think carefully before opening attachments or clicking on links.

Hi Donna. I hope you're doing good. I just received your email stating that we have been trading past 3 am which i believe is a misunderstanding and i am sure we have never traded past the closing time. Whatever evidence you think you have i am ready to go through it with you. Thank you.

On 6 Feb 2025, at 11:54 am, Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk> wrote:

Dear REDACTED

Licensing Act 2003 – Breach of Conditions
Zaf'ron, 99 North Road, Brighton BN1 1YE
Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

Following on from my previous email sent to you on 13 January 2025, where I advised that we had received complaints from residents in the surrounding area. Alleging that they are being disturbed on a regular basis from loud music coming from your premises. Also, from your customers parking on double yellow lines and that you are trading past your permitted times and causing a public nuisance. (See copy of email below).

I now advise that I have evidence that you have been trading past your permitted hours. The evidence shows that on 22 January 2025 at approximately 03:57 and 1 February 2025 at approximately 03:59.

Below are the details of breaches of your premises licence:

Times the licence authorises the carrying out of licensable activities

Late Night Refreshment

Every Day: 23:00 - 03:00 Outdoors - Takeaways and Deliveries only

The opening hours of the premises

Every Day: 12:00 - 03:00

As stated above, you have been trading past your permitted licensable activity times.

Annex 2 – Operating Schedule

In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

Prevention of Crime and Disorder:

- 4. There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight. The door staff will be on duty from midnight until close.
On both occasions you did not have SIA on the premises in accordance with the above condition.

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.

On 1 February 2025, a motorcycle delivery driver was parked on double yellow lines. This is a breach of the above condition.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

(1) A Person commits an offence if –

(a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b) he knowingly allows a licensable activity to be carried on.

(4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

The above is extremely disappointing, especially as I had previously highlighted that we had received complaints that you are trading past your permitted hours.#

As a result of the above I am issuing you with a **Warning**.

I have copied into this email Police Licensing and Chinwe Ihemefer (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services
Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP
T REDACTED | REDACTED

From: Donna Lynsdale
Sent: 13 January 2025 14:52
To: 'REDACTED' <REDACTED>
Cc: Brighton.Licensing@sussex.police.uk; Chinwe Ihemefor <REDACTED>
Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/00088/LICRSK/EH
Importance: High

Dear REDACTED

Licensing Act 2003 – Breach of Conditions
Zaf'ron, 99 North Road, Brighton BN1 1YE
Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

On Thursday, 9 January 2025 at 15:52, accompanied by my colleagues Hannah Staplehurst and PC Wade, we visited your premises and carried out a full licensing inspection. At time of this visit we spoke with 'REDACTED'.

Below are our findings and details of breaches of your premises licence conditions:

Annex 2 - Conditions consistent with the Operating Schedule:
In regard to Minor Variation application 2024/04125/LAPRMV to remove and replace with conditions agreed with Sussex Police under Annex 2:

Prevention of Crime and Disorder:

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.

The CCTV was only storing for 30 days and not 31 days in accordance with the above condition. The time showing was one hour ahead. The staff member was unable to operate the system until they spoke with yourself to obtain the password.

There will be a minimum of 1 SIA licensed door staff at all times the premises opens past midnight.

The door staff will be on duty from midnight until close.

We were informed that you have an SIA licensed door staff, however the staff member did not know if they were independent or supplied by a door supervisor company.

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.

You did not have an SIA risk assessment available at the time of our visit.

At all times the premises is open to the public, the management will contract the backup 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.

At the time of our inspection, you did not have an MSU contact.

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.

At the time of our inspection, you did not have a membership with BCRP.

- 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.

At the time of our visit the staff member was unable to show us an incident log. The incident logbook should be inspected and signed off by a manager at least once a month.

Prevention of Public Nuisance:

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.

Following the licensing inspection, we witnessed one of your delivery drivers had left a Moped on double yellow lines.

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

There were no notices on display.

Protection of Children from Harm:

a) 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.

b) 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.

c) 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.

There were no training records available at the time of our visit.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

(1) A Person commits an offence if –

(a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or

(b) he knowingly allows a licensable activity to be carried on.

(4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

It was very disappointing that despite providing you will all the relevant documentation to comply with your premises licence, you have chosen not to use them and breaching your licence conditions.

Also, this authority is still receiving complaints from residents in the surrounding area. The residents are alleging that they are being disturbed on a regular basis from loud music coming from your

premises. Also, from your customers parking on double yellow lines and that you are trading past your permitted times and causing a public nuisance.

I note that my colleague previously emailed you regarding complaints that we have received. To date you have not acknowledged her email or responded.

We will be carrying out a follow up visit in the near future. Please ensure the above has been rectified and complied with.

I have copied into this email Police Licensing and Chinwe Ihemefor (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services

Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP

T REDACTED | **REDACTED**

Appendix G

From: REDACTED <REDACTED>

Sent: 09 June 2025 11:55

To: Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk>

Cc: Brighton Licensing <brighton.licensing@sussex.police.uk>; Chinwe Ihemefor <REDACTED>

Subject: Zaf'ron, 99 North Road, Brighton BN1 1YE - 2025/01395/LICPRM/EH

Dear Donna,

Thank you for your email and expressing your concerns, recently there was work carried out in the premises but it was during the working hours and it was before 10pm the shop was also closed for a day and more, I am Very strict when it comes to closing times I have strictly instructed my staff to close the shop at 3am and we do not serve after 2:30am to clear the restaurant before the time, I also check my camera at all the times so far there hasn't been any day that we have passed the 3am line, furthermore we do not allow anyone to dine in after 10:45pm.

I assure you that we adhere with our licensing agreement and never exceed our standard operating hours.

If you would like to visit our restaurant to meet and discuss this further I am always available.

If you require any further clarification kindly do not hesitate to contact us.

Kind regards

REDACTED

Sent from [Outlook for iOS](#)

From: Donna Lynsdale <Donna.Lynsdale@brighton-hove.gov.uk>

Sent: Monday, June 9, 2025 8:52:44 AM

To: REDACTED <REDACTED>

Cc: Brighton Licensing <brighton.licensing@sussex.police.uk>; Chinwe Ihemefor <REDACTED>

Subject: Za'ron, 99 North Road, Brighton BN1 1YE - 2025/01395/LICPRM/EH

Dear REDACTED

Licensing Act 2003 – Breach of Conditions

Za'ron, 99 North Road, Brighton BN1 1YE

Premises Licence Number: 1445/3/2024/04125/LAPRMV

I am writing to you in your capacity as the Premises Licence Holder (PLH) for the above premises.

The Licensing Authority have received further complaints from residents in the surrounding area. The residents are alleging that your premises has been carrying out building works late at night and going into the early hours of the morning. Also, that you are continuing to trade past your permitted hours and disturbing and causing a public nuisance to your neighbours.

This is not the first time I have had cause to write to you regarding complaints received and trading past your permitted hours.

I remind you that non-compliance with conditions constitutes a breach of the Premises Licence issued under the above legislation. Please ensure that all conditions on the licence are adhered to. It is an offence under the Licensing Act 2003, S136(1) and (4) to carry on unauthorised licensable activities. The legislations states that:-

(1) A Person commits an offence if –

- (a) he carries on or attempts to carry on a licensable activity on or from any premises otherwise than under and in accordance with an authorisation, or
- (b) he knowingly allows a licensable activity to be carried on.

(4) A person guilty of an offence under this section is liable on summary conviction to imprisonment for a term not exceeding six months or to an unlimited fine, or to both.

Irrespective of the permission's and restrictions attached to any premises licence, all licensed premises are required to operate with regard to the 4 licensing objectives, which are;

- o The Prevention of Crime and Disorder
- o Public Safety
- o Prevention of Public Nuisance
- o Protection of Children from Harm

Please be aware that any enforcement action is taken in line with our Licensing Enforcement Policy. You are also reminded that at any stage, following the grant of a premises licence, a responsible authority, such as the Police, Environmental Health, or an interested party such as a resident living in the vicinity of the premises, may ask the Licensing Authority to review the licence because of a matter arising at the premises in connection with any of the four licensing objectives.

The above is extremely disappointing, especially as I have already raised similar concerns about your premises.

I have copied into this email Police Licensing and Chinwe Ihemefor (Environmental Protection).

Please acknowledge receipt of this email. When responding please reply to all.

Yours sincerely

Donna Lynsdale | Fair Trading Officer & Licensing Officer (Trading Standards & Licensing),
Regulatory Services

Brighton & Hove City Council, 2nd Floor, Barts House, Barts Square, BN1 1JP

M REDACTED | REDACTED

REP B

From: Cllr Mitchie Alexander REDACTED
Sent: 19 August 2025 14:34
To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>
Subject: Zefron, North Rd license review representation

EF CON ENDS 10.09.2025 VALID PCD, PPN, PCH and PS (B)

Hello,

I am sending you a representation on behalf of local residents on why myself as a city councillor and the residents who live very close by believe that Zefron, 99 North Rd, Brighton BN1 1YE should not continue with their current licence terms.

Prevention of Crime and Disorder:

Local residents have told me that they have witnessed drug dealing going on centred around this premises.

I also understand that a REDACTED resident and the staff REDACTED Recently REDACTED This is not an action that should be tolerated of course, but rather than phoning the police, REDACTED neighbours are very upset about this REDACTED as they all care what happens to REDACTED After this REDACTED. And a short time afterwards REDACTED

The nearby residents also say that the shop has continually broken it's licence by staying open to 5am on many occasions.

Public Safety:

The residents living close to Zefron say that they do not feel safe. Some of the residents who live REDACTED have stated that they feel unsafe REDCATED they feel afraid that REDACTED This includes children and teenagers who live REDACTED The REDACTED was not safe in REDACTED neighbourhood.

Prevention of Public Nuisance:

The residents state that their sleep is very negatively impacted, due to the comings and goings of cars and motorbikes visiting the shop during the nighttime hours. They state that vehicles will hoot their horns. The very fact that the residents are in fear REDACTED residents REDACTED have complained about the anti social activities surrounding the shop (violence, menacing behaviour, noise from vehicles, breaking their licence etc).

Protect children from harm:

It has been stated to me that various children REDACTED because of fear of the Zefron staff and visitors. No child should be afraid REDACTED their home ! These same children are now even more afraid as they have heard REDACTED Whether or not REDACTED children living in the REDACTED No child should live in fear in their own home.

I am happy to give a representation on behalf of the residents in this area at the review hearing.

Best Regards
Mitchie

Cllr Mitchie Alexander

REP C – Cllr Sue Shanks 4.9.25

Complaints about Zafron

In late 2024 residents of REDACTED complained to ward councillors, myself and Cllr Macleay and to the local MP Sian Berry about noise and disturbances accused by taxi drivers congregating outside Zafron as well as concerns about the restaurant operating beyond its licensed hours.

A full inspection with the police followed the complaints in January.

The complaints included doors opened and music playing really loud. Including men standing in the street talking loudly, also slamming car doors and playing loud music. Residents complained but were met with REDACTED

I visited Zafron and the manager was pleasant and denied they were trading late or making a noise outside.

In July I received more complaints. It was hot and residents had to keep their windows open. Noise from a group of people shouting and swearing outside the shop. This kept children awake and REDACTED complained to restaurant asking them to keep the door shut and keep customers in the shop.

Customers then REDACTED The resident stated 'Zafron should have ask them nicely and to explain we have children trying to sleep not tell them what bedrooms it is coming from,.We even heard things like "REDACTED " "yeah one of these REDACTED .It's really scary for the children.

Other issues highlighted were the use of Zafron as a place to meet by non customers, bright lighting outside the building , ' The sign on windows that says respect neighbours is at the bottom of the shop and is not visible at all at night as the massive bright menu cancels it out'. Male staff were shouting at their friends outside REDACTED.

The delivery drivers also cause noise, shouting for orders. Beeping. Reving engines.

'people outside the premises, perhaps from REDACTED shouting at staff hello and staff letting them loiter outside the shop with dogs barking is not acceptable. They shake their hands come out to talk to them. The stay around here sometimes arguing REDACTED'

Following a REDACTED at Zafron recently I spoke to a police person, REDACTED, who said the license would be stopped and then reviewed, as we now know it couldn't be as is not alcohol.

I feel that a late licence has proved inappropriate in this area. I did speak to Zafron staff who were pleasant and said REDACTED that is in the hands of the police.

Due to the complaints outlined above and the recent police involvement I support the termination of the late license. I feel it meets the threshold for removal due to all 4 factors of :

Prevention of crime and disorder, Public safety, Prevention of public nuisance Protection of children from harm

REP D

Emily Fountain
Licensing Officer
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Date: 5th September 2025
Our Ref: 2025/02151/EPLIC/EH
Phone: 01273 REDACTED
E-mail: REDACTED

EF CON ENDS 10.09.2025 VALID PPN (C)

Dear Emily Fountain

Formal Representation for a Premises Licence Review Application
Re: Zaf'ron, 99 North Road Brighton, BN1 1YE

In reference to an application for the review of the Late-night Refreshment (LNR) Licence of Zaf'ron, 99 North Road Brighton, BN1 1YE to operate between 2300 hours and 0300 hours by the Sussex Police, seven days a week, I write as a consultee on behalf of the Environmental Protection Team to formally make a representation on the grounds of the Prevention of Public Nuisance; one of the four objectives as specified by the Licensing Act 2003.

The Environmental Protection Team received three complaints about noise and odours from the business on the 13th of September 2023, even before a LNR licence was granted to them. We were told the disturbance was from noisy staff after closing times, strong cooking odours and smoke, and banging during clean-up.

On the 31st of July 2024, another complaint was made about loud music played after closing times between 2300 hours and 0100 hours nearly every day; noise from loud metal banging during afterhours cleaning with the doors left open, and shouting. The disruption was causing neighbours to lose sleep.

Warnings were sent to the business on 21st September 2023 and 9th of August 2024, and diaries to residents but no responses from business.

On the 14th of August 2024, another complaint about noise from loud banging, taking out thrash, and rowdy customers/workers came in.

A diary was returned 12th of October 2024 detailing incidents of drunk people and people being rowdy outside the premises, beeping of horns, slamming car doors, taxis parked illegally on the road, noise from taking out rubbish late at night and loud music late at night. Based on this evidence, a stronger warning was emailed to the business on the 14th of October 2025.

Premises Licence Holder called after this letter in October 2024 to say the complaints made about them were unjustified and they do not believe the complaints are from their neighbours, who were in support of their application for a LNR licence. They wondered how we could have gotten complaints as they only just started operating.

A 4th complaint about odours and smoke from business affecting residents in their homes and gardens on the 5th of November 2024.

Complaints resume on the 30th of January 2025, which are still about men shouting, banging noise from cleaning after closing hours, which escapes through open doors, and intrusive bright lights from the premises but now the disturbance is said to continue till 0300 hours. Complainant claims residents were not consulted about the LNR application as they would have opposed the proposal considering the persistent issues when they could only operate until 2300 hours.

Another warning sent to business on the 17th of January 2025 and a diary to the complainant.

On the 4th of June 2025, it is alleged that construction work is being carried out at the premises till 0100 hours. A warning sent out and a diary to the complainant again.

In the past, it has been difficult engaging with the business, and it did not appear that they were actively seeking to address the issues raised by residents through the Environmental Protection Team by employing further preventive measures to uphold the Prevention of Public Nuisance objective.

The business has finally put forward proposals to deal with Nuisance, for example, cleaning up early and quietly, taking out trash at reasonable times, minimising noise from music, staff and customers and dimming lights at night.

The plan is to reduce the noise from cleaning by winding down operations before 0300 hours, asking staff to be quiet and avoid banging equipment.

It is questionable whether these measures will prove effective since cleaning after 2300 hours and before 0300 hours when the business did not have a LNR licence caused a disturbance, and it is tricky cleaning kitchen equipment without banging.

We are told the noise from cleaning is a problem because the doors of the premises are left open during the process, so it seems rational that keeping the doors closed except for access and ingress, in addition to the above proposals is more effective at reducing the noise but the business has not suggested this option. It is uncertain whether closing the doors is feasible.

In conclusion, I am not confident that the business is able to manage their activities sufficiently to avoid causing a Nuisance before 2300 hours let alone the 0100 hours closure time proposed, considering their track record and the fact that complaints from neighbours persist despite them employing the said mitigation.

The Environmental Protection Team does not support this proposal due to the reasons outlined in this representation, if the Licensing Panel decides to grant this licence for the provision of Late-Night Refreshment, we propose the additional conditions in the attached addendum to uphold the Prevention of Public Nuisance licensing objective.

Please do not hesitate to contact me if you wish to discuss the matter further.

Yours sincerely

Chinwe Ihemefor
Environmental Health Officer

Addendum

- Delivery personnel will only collect at the counter and will wait quietly to collect the orders to be delivered.
- Refuse shall be placed into receptacles outside the premises no later than 22:00 hours and no earlier than 07:00 hours.
- No noise, vibration or light shall emanate or be transmitted through the structure of the premises that gives rise to a nuisance.
- The premises license holder shall ensure that any extraction system associated with the premises is satisfactorily operated and maintained to prevent noise, smoke/fumes and/or odour from causing a nuisance.
- Doors of the premises shall be kept shut at 22:00 hours and during clean-up, except for ingress and egress.

REP E

From: Sian Berry MP REDACTED

Sent: 09 September 2025 17:18

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

Subject: Representation re: review of premises licence for Zaf'ron, 99 North Road, Brighton.

EF CON ENDS 10.09.2025 VALID PCD, PS and PPN (E)

Re: review of premises licence for Zaf'ron, 99 North Road, Brighton.

Over the course of this year I have received regular correspondence about these premises from several residents REDACTED. My constituents report ongoing nightly disturbances centred around this restaurant, which they say is connected to the late licence it holds, a licence they say has been breached on multiple occasions.

These incidents have been reported to the council and the police by my constituents, so I believe the licensing panel should have residents reports available to scrutinise directly. However, to summarise, my constituents have expressed concerns that loud disturbance in the street outside, and around this restaurant, regularly prevents local residents from sleeping, and that this regularly continues until 3am, and sometimes until 5am. They say the ongoing sleeplessness due to noise nuisance and incidents is having a significant effect on family life, and on children living in REDACTED whose loss of sleep my constituents believe is harming both their health and their schooling.

The correspondence I have received from residents leads me to urge the panel to listen carefully to their concerns, and to their experiences of living REDACTED this business, when you are considering the licensing objectives of prevention of public nuisance and the protection of children from harm.

I have been hearing from constituents for some time about the local community tensions they say the restaurant's late license creates. As the local authority will be aware, events have recently escalated REDACTED and residents continue to have concerns about the volatility of the situation. Given this, I would urge the licensing panel to give careful consideration to what both local residents and the police have to say about community tensions and risk, when deciding whether these premises can retain their licence while maintaining the licensing objectives of prevention of crime and disorder, and public safety.

Siân Berry MP

Siân Berry MP for Brighton Pavilion

Constituency Office of Siân Berry MP
Green Party, Brighton Pavilion
REDACTED

REP F

EF CON ENDS 10.09.2025 VALID PCD (F)

Immigration representation in support of an application for the review of a premises Licence

On behalf of the Secretary of State, Home Office (Immigration Enforcement) makes representations in support of the following application for the review of a premises licence, relating to the prevention of crime and disorder objective, including the prevention of illegal working and immigration crime in licensed premises.

IE wishes to make representations on an application for a review of a premises licence.

Details of Premises:			
Premises Licence Holder:			
Zaf'ron Limited			
Name and Address of Premises:			
Zaf'ron 99 North Road			
Post Town:	Brighton	Post Code:	BN1 1YE

Representations are being made for the following reasons:

On 02 August 2025, officers from Brighton and Hove Police attended Zaf'ron, 99 North Road, Brighton, BN1 1YE to investigate REDACTED During the course of the investigation, several individuals suspected of being employed at the premises REDACTED It was subsequently discovered that one of these individuals did not possess the legal right-to-work in the UK.

REDACTED

REDACTED was encountered at the premises and was seen wearing a Zaf'ron branded uniform at the time. Home Office checks confirmed REDACTED made a claim for protection in July 2024 which was refused in April 2025. REDACTED was on immigration bail when encountered working at Zaf'ron, REDACTED bail conditions strictly prohibited him from undertaking any type of employment in the UK. Therefore, REDACTED was an illegal worker as he was found working in breach of bail conditions.

Zaf'ron is listed on Companies House under the trading name ZAFRON EASTBOURNE LIMITED. The company registration number for ZAFRON EASTBOURNE LIMITED is 16383295. Companies House shows that it was incorporated on 11 April 2025, is currently active and Norulah HABIBI is listed as the Director who was appointed on 11 April 2025.

It must be noted that Norulah HABIBI is currently listed as the active director of Zafron Crawley, officially registered under the name ZAFRON CRAWLEY LTD (Company No. 15437053). HABIBI was appointed as director on 21 March 2025.

On 14 March 2025, Immigration Enforcement officers conducted a visit to the premises; Zafron Crawley, located at 6–14 High Street, Crawley, RH10 1BN. During the visit, **three individuals** were found to be working illegally. During interviewing, REDACTED was named as the employer by an individual found working illegally, who also confirmed REDACTED was responsible for assigning duties and managing work schedules.

RIGHT TO WORK CHECKS AND THE PREVENTION OF CRIME AND DISORDER

The objective of the Licensing Act 2003 (the Act) is to provide a clear, transparent framework for making decisions about applications by individuals or businesses wishing to sell or supply alcohol or provide certain types of regulated entertainment and late-night refreshment.

There are four licensing objectives which underpin the Act, and which need to be taken into account and promoted throughout the licensing process.

The licensing objectives are:

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

Zafron under the control of Norulah HABIBI has been found employing illegal workers at both the premises in Brighton and Crawley. This business has clearly failed to meet the prevention of crime and disorder objective. The licence holder would have been aware of their responsibilities to uphold the licensing objectives as they are clearly defined as part of the premises licence application. It is an offence to work when a person is disqualified to do so, and such an offence can only be committed with the co-operation of a premises licence holder or its agents.

The employer could have protected themselves and prevented crime and disorder by completing a straightforward right to work check. In this case the employer had not conducted the right to

work checks even when he was presented with documents prior to commencing work. Should the licence holder have attempted these checks, the workers would have failed at the first stage. This would have quickly and easily confirmed that they did not hold the relevant right to work, and the licence holder could have protected themselves from employing an illegal worker. All employers are dutybound by law to conduct these checks if they wish to avoid being penalised if found to have employed someone who is prohibited from working, and guidance can be found on the gov.uk website or by using a search engine. Additional information on how to conduct these checks is available online, this includes the Home Office's official YouTube page.

The use of illegal labour provides an unfair competitive edge and deprives the UK economy of tax revenue. Illegal workers are often paid below the minimum wage (itself

an offence) and National Insurance payments are not paid. A key draw for illegal immigration is work and low-skilled migrants that are increasingly vulnerable to exploitation by unlawful enterprises, finding themselves in sub-standard accommodation and toiling in poor working conditions for long hours.

Whether by negligence or willful blindness illegal workers were engaged in activity on the premises. Section 182 guidance of the Licensing Act 2003 at point 11.27 states that certain activity should be treated particularly seriously, and this includes employing someone who is disqualified from that work by reason of their immigration status in the UK. 11.28 of the guidance states that it is expected that revocation of the licence – even in the first instance – should be seriously considered.

Details of Responsible Authority			
Name and Address:			
Immigration Enforcement Immigration Enforcement Licensing Compliance Team 6th Floor, 2 Ruskin Square Dingwall Road Croydon CR0 2WF			
		Emailaddress (optional):	REDACTED

Signatures			
Signature of Responsible Authority			
Home Office Immigration Enforcement			
Date:	10 September 2025	Capacity:	Responsible Authority

REP G

From: REDACTED

Sent: 10 September 2025 15:47

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

Subject: Za'fron, 99 North Road, Btn

Importance: High

EF CON ENDS 10.09.2025 VALID PCD and PPN (G)

To whom it may concern,

As part of any premises licence application, since August 2022 the planning department have been consulted. When a review of Za'fron's premises licence was raised, I checked the Council's systems to see what current planning permission there is for this address.

I have attached the current planning permission. This is still extant and condition 4 attached to BH2010/01036 states:

The premises can only be open for the following hours.

08.00 to 23.00 Monday to Friday

08.00 to 23.30 Saturdays

09.00 to 23.00 Sundays, Bank Holidays

This restaurant (planning class Use E) should not be open past 11pm or 11.30pm on Saturdays. If this restaurant were to open past the conditioned hours of opening in the future, then the Council may consider further enforcement action for the breach of the conditioned opening hours, by serving a Breach of Condition Notice. There is no right of appeal against this notice and if breached in the future the Council may prosecute the responsible persons at Brighton Magistrates Court.

The previous planning use at this address were a delicatessen and café/restaurant (planning class Use E). These hours were set due to the location of the property, in a residential area and was to safeguard the amenities of the local area and to comply with Planning Policies SU10 and QD27 of the then Brighton & Hove Local Plan. The policy QD27 is still within the current City Plan Part 2, as DM20 (the main Planning document). This Policy prevents material nuisances and the loss of amenities to local residents. This is why the previous business was conditioned to close at the above hours to prevent any excessive noise, artificial lighting to any local residents.

Planning acknowledge that it is a separate regime to Licensing however it is felt that the breach of the conditioned opening hours is a contributing factor for the licence having to be reviewed. The Planning department were unaware that there was a breach of planning control at the restaurant and to prevent any future possible complaints from local residences that fall within the licensing objective of the Prevention of Public Nuisance. I support the review brought by the Police on the grounds of the Prevention of Crime & Disorder and the prevention of Public Nuisance.

Kind regards

REDACTED Senior Planning Officer | Development Management – Enforcement Team
Directorate of Place, 1st Floor, Hove Town Hall, Norton Road, BN3 3BQ

Representation Letter – Premises Licence Review (Zaf’ron, 99 North Road, Brighton)

Norulah Habibi (Premises Licence Holder)
Zaf’ron, 99 North Road Brighton,
BN1 1YE

22 August 2025

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

Dear Licensing Panel,

I am writing to formally respond to the premises licence review application submitted by Sussex Police in relation to Zaf’ron, 99 North Road, Brighton. I understand that this review has been requested on the grounds of the **prevention of crime and disorder**, following a serious incident at my premises on 2 August 2025, as well as other concerns raised by Sussex Police and the Council. I appreciate the opportunity to make this representation, and I do so with a genuine commitment to address all allegations, take responsibility where appropriate, and outline the proactive measures I have implemented to promote the licensing objectives.

Response to Specific Allegations

Firstly, I wish to address each of the specific **allegations raised by Sussex Police and the Licensing Authority**, providing our perspective and, where applicable, our acceptance of mistakes:

- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

I [REDACTED]

I [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

■ [REDACTED]

[REDACTED]

- **Delivery Driver Complaints (Parking and Noise):**

We have received and acknowledge complaints regarding **nuisance caused by delivery drivers** picking up orders late at night – issues such as motorcycles

being parked on double yellow lines, engines revving, or drivers congregating and talking loudly outside. I understand how this behaviour can disturb neighbours, and I apologize that it was not pre-emptively controlled. As soon as this issue was brought to our attention (earlier in 2025), I took proactive steps to **mitigate the impact of delivery pickups**: I **contacted all the delivery platforms** we use (Uber Eats, Just Eat, Deliveroo) to formally notify them of the complaints and to ask for their cooperation in instructing their drivers to be respectful of our street and neighbours. We specifically requested that drivers **do not park illegally or inconsiderately**, and that they **refrain from making noise (no horn honking, loud music, or shouting)** when collecting orders. We have also **implemented our own in-house rules**: staff now advise every driver upon arrival to use appropriate parking (there is a loading bay around the corner that can be used legally) and to **turn off their engines** while waiting. We've created a designated waiting area just inside our entrance for drivers, so they don't need to linger out on the pavement. In addition, I have put up **clear signage** asking delivery couriers to be quiet and mindful of residents. If any particular driver is observed flouting their employer (the delivery service) so that the issue is documented. These efforts have **significantly improved the conduct of delivery pickups** at Zaf'ron. We will continue to be vigilant on this front – our goal is that our takeaway service remains as **unobtrusive as possible** to the neighbourhood.

- **Cleaning is done quietly and earlier**: We now begin wind-down operations well before 3am. No loud cleaning tasks (such as moving bins) occur after 11pm if possible. Any cleaning that must be done after closing is handled at a low volume – staff are instructed to **speak softly**, avoid any banging of equipment, and close doors gently.
- **Waste is stored indoors until morning**: Instead of dragging garbage bags or bins out to the street at 3am, we now **hold all waste inside the premises overnight** (securely stored) and only put refuse out at a reasonable morning hour on the day of collection. This ensures there is **no disruptive rubbish removal noise** during the night.

- **No music or shouting:** We ensure any background music in the shop is turned off well before midnight, and certainly no music plays after hours. Staff do not loiter outside chatting after work; they are reminded to depart quietly and respect that this is a mixed commercial/residential street. Since implementing these changes, we have not received further complaints about noise or waste disturbances from our immediate neighbours. I am committed to maintaining these practices permanently so that Zaf'ron **creates no public nuisance**, especially at closing time.
- **Waste Disposal and Late-Night Noise Complaints:** Some residents have raised concerns about **noise late at night**, including the clatter of disposing rubbish or general disturbance from our cleaning up at closing time. I apologize for any noise we inadvertently caused during our late-night closing routine. In response, we have **modified our procedures to minimize noise**:
- **Allegation of a “Repeated Offender” Returning on Multiple Nights:** There was an implication that a particular troublesome individual (or “repeat offender”) issues. I want to clarify that **we do not knowingly allow anyone who has caused serious trouble to return** to Zaf'ron. If an individual was involved in a violent incident or egregious misconduct at our venue, they would be **barred from the premises**. We keep an internal record (and now an incident log book) of problematic patrons. To my knowledge, the person(s) involved in the August 2nd incident have **not returned to the venue since** – certainly not with our permission. If the police are referring to a different incident or person, I would need more detail, but I can assure the Panel that **any person identified as a cause of disorder is unwelcome at Zaf'ron going forward**. Our new security protocols, including membership in the local Barred Persons scheme (through BCRP radio) and diligent door supervision, will help us **identify and refuse entry to any known troublemakers**. We take this very seriously: one of the reasons we are increasing our collaboration with the Brighton Crime Reduction Partnership is specifically to stay informed about individuals with a history of causing issues in the area. In summary, we have **no tolerance for repeat offenders**, and if someone has been involved in criminal or violent behaviour

at Zaf'ron, they will not be allowed back in. Should any such individual attempt to return, our staff (and security) will immediately turn them away and alert the police if necessary.

Remedial Actions and Proactive Measures

In light of the above issues, I want to reassure the Panel that Zaf'ron's management has not waited for this hearing to make improvements. We have already implemented a range of **remedial actions** and are committing to further **proactive measures** to ensure full compliance and promote the licensing objectives. Below I detail the concrete steps taken and planned:

- **Engagement of a Professional Licensing Consultant:** I have **appointed an experienced business/licensing consultant** to advise our management team. This consultant specializes in late-night hospitality compliance and has been guiding us on best practices. With their help, we have improved our record-keeping, reviewed all licence conditions in detail, and instituted better internal checks to ensure nothing is overlooked. This external expertise is Essentially, we now have a **competent professional monitoring our compliance** and offering ongoing advice on how to run a safer, fully compliant late-night operation.
- **Contract with Pagoda Security (SIA Door Supervisors):** We have entered into a regular full time **contract with Pagoda Security Services**, a reputable local security company, to provide **SIA-licensed door supervisors** for Zaf'ron for late night operation. This means that on every night we are open past midnight, **a dedicated, trained security guard will be on duty at the premises** from 00:00 until closing (in addition to myself when I am present). Pagoda Security will typically station a guard at our door during the key late hours, especially on weekends when nighttime activity is busiest. This contractual arrangement eliminates any uncertainty over security staffing – it is no longer just an informal or ad-hoc practice, but a guaranteed provision. Having a professional door supervisor on site will greatly **enhance our ability to prevent and manage disorder**.

Staff Training and Incident Logging: I have prioritized raising the skill and awareness level of all our staff when it comes to safety, conflict management, and

compliance. **Every team member at Zaf'ron is undergoing additional training**, with an emphasis on: **Conflict Management & De-escalation:** Through sessions arranged in coordination with Pagoda Security (and other accredited trainers), our staff will be taught on how to calmly defuse tense situations and handle difficult customers without resorting to force. This includes scenario-based training on dealing with aggression, recognizing when to call for backup, and techniques to protect themselves and others while minimizing harm.

- **Joining the Brighton Crime Reduction Partnership (BCRP):** Soon after the license was granted, We **enrolled in the Brighton & Hove Business Crime Reduction Partnership BCRP**, obtaining a “NightSafe” radio handset for communication with police and other venues (fulfilling the partnership membership condition). This is a program that connects late-night businesses like ours with the police and each other. Through BCRP, we will have access to the citywide radio network and information-sharing about any individuals who are known to cause trouble around town.

- **Emergency Procedures:** We have retrained everyone on the correct response to emergencies – whether it’s a fight, a medical issue, or any **calling 999 immediately** is a priority in serious incidents, as discussed earlier. We’ve even conducted internal drills so that staff can practice what to do in case of violence, fire, or other emergencies. They now have a clear chain of command to report issues upward to me or the senior person on duty without delay.

- **Record-Keeping and Incident Log:** We have introduced a new **Incident Log Book** kept on the premises at all times. Staff have been instructed to record any notable incidents (no matter how minor they may seem) in this log such as refusals of service, arguments, ejections, complaints, or any time we call police. I review this log personally each week and sign off on it monthly to ensure it’s being used diligently. This log will be available for inspection by authorities at any time. It serves both as a compliance tool and a way for us to spot patterns and continually improve. By maintaining a detailed incident log, we promote transparency and accountability in our day-to-day operations.

- **Upgraded CCTV System (Maintenance and Accuracy):** We have invested in **upgrading our CCTV** to ensure it is fully reliable as a safety and evidential tool. The system now has **high-definition cameras** covering all key areas of the restaurant (including the dining area, kitchen, entrance, and the immediate pavement outside). The **timestamp is accurate** and synchronized with atomic time – as mentioned, I check it weekly – and the DVR stores at least **31 days of footage** in compliance with our licence conditions. I have posted signage alerting customers and passers-by that **CCTV is in operation for their safety and security**. Equally important, I have made sure **multiple staff members are trained to operate the system** (live monitoring, playback, and exporting footage) so that if police or council officers ever need evidence, we can provide it without any delay. Essentially, our CCTV is now a robust part of our crime prevention and public safety strategy, and it will be kept continuously well-maintained. This directly addresses the previous issues we had with the system's timestamp and staff knowledge those are fully resolved.

- **Collaboration with Delivery Platforms (Driver Conduct):** As noted earlier, we took immediate action to mitigate **delivery driver nuisance**. Beyond the an open line of communication with these companies. If a particular driver repeatedly ignores our requests for quiet and lawful conduct, I will report that driver through the platform and request they not be assigned to our restaurant. We've found the delivery companies receptive to such feedback because it aligns with their own policies. Additionally, I have established a **designated pickup spot inside the premises** to draw drivers off the street, and we strive to have orders ready promptly, so drivers do not linger outside unnecessarily. These measures have been effective; there's been a noticeable reduction in noise and congestion out front. We will continue to **coordinate with the delivery services and enforce courteous driver behaviour** so that our takeaway operation does not create public nuisance.

- **Noise Control and Neighbourhood Respect:** To further the **Prevention of Public Nuisance** objective, we have instilled a mindset in our team that we must be **excellent neighbours**. Concretely, in addition to the quiet cleaning and waste procedures already detailed, we've made a few other adjustments. We make sure that as we approach closing time, the environment in and around the shop is calm and

quiet. Lights are dimmed, any remaining staff or drivers are reminded to be silent outside.

I will **personally reached out to neighbouring residents and businesses** to open lines of communication. I will deliver letters with my personal mobile number and email, encouraging neighbours to contact me directly if they have any concerns or if any disturbance is noticed coming from Zaf'ron. My commitment is to **address any issue immediately** whether it means apologizing and rectifying a mistake or direct engagement, I believe, helps build trust that we truly care about our impact on the community.

All of these measures are either already in place or actively underway, demonstrating my determination to correct past issues and run a responsible, well-controlled establishment. I believe they directly **strengthen our compliance with all licensing objectives** and go above and beyond the basic requirements.

Community Contribution: Beyond our statutory duties, I want to emphasize that Zaf'ron strives to be a **positive force in the community**. We have a practice of providing food and hot tea/coffee to late-night delivery drivers and taxi drivers in our area who often have limited options at late hours. This not only supports those workers but also encourages them to behave respectfully around our premises (as they appreciate our hospitality). During the past year, we also **participated in feeding homeless individuals** in Brighton for example, we prepared and donated meals during a community outreach event last winter, and we plan to continue these charitable efforts on a regular basis. We are a small family-run business, and being part of the Brighton community means a great deal to us. We are committed to giving back and being a responsible neighbour on North Road. I hope this context shows that Zaf'ron is not just another late-night outlet, but a community-minded business that adds value to the local area.

Conclusion

I would like to **formally propose a voluntary reduction in our terminal hour from 03:00 to 01:00** (for dine-in, takeaway, and delivery) as a sincere demonstration of our commitment to remedying problems and promoting the licensing objectives. This earlier closing time, I believe, is a reasonable and proportionate step to address concerns, especially given that a nearby establishment (the REDACTED on North Road) is licensed to serve alcohol until 01:00; our proposal would bring Zaf'ron's hours into line with the local precedent and community expectations. Operating until 01:00 is essential to our viability. We feel that a 1am closing time is a balanced solution that **addresses residents' concerns and Police/licensing objectives**, while still allowing us to serve late-night customers up to a point. We are a small independent business and the sales between 23:00 and 01:00 allow us to cover rent, staff wages, and other fixed costs. Without these hours, the business may not survive. I believe this compromise both protects the community and sustains local employment. but we recognize that operating under the right conditions and with respect for our neighbours is paramount. We are prepared to make this sacrifice of trading hours in order to demonstrate our commitment to change and to ensure that Zaf'ron does not contribute to late-night disorder.

I deeply apologize for the incidents and lapses that led to this review, and I am determined to **provide clarity, context, and corrective actions** so that the Panel can be confident in our ability to operate responsibly moving forward. My aim is not to deflect blame, but to show that we have **listened to the feedback from the authorities and our community** and have acted decisively to rectify every issue within our control. I am confident that with the robust measures now in place strengthened security, better-trained staff, improved procedures, and shorter hours Zaf'ron can continue to trade in a manner that **upholds the licensing objectives** of Prevention of Crime and Disorder, Public Safety, Prevention of Public Nuisance. We have been a part of the North Laine community for some time and we genuinely wish to be **seen as a positive presence**, not a source of problems. I humbly ask the Panel to consider the extensive steps we have taken and our willingness to compromise (by reducing hours) as evidence of our determination to turn things around and be fully compliant.

Thank you for your time and consideration. I am, of course, **willing to accept additional conditions** or recommendations the Panel sees fit to impose, and I will ensure they are implemented in full. I will also be present at the review hearing to answer any questions.

Yours sincerely,

Norulah Habibi

Premises Licence Holder, Zaf'ron (99 North Road, Brighton)



Brighton & Hove Business Forum Ltd Brighton

Police Station
John Street Brighton BN2 0LA

01273 321117

accounts@businessforumbrighton.co.uk

Invoice

Zafron Zaf'ron Ltd 99 North Road Brighton BN1 1YE United Kingdom	Invoice Number: 37503 Invoice Date: 28/05/2025 Due Date: 29/05/2025 Account: DMZAFRON BRANCH: Zafron
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Zaf'ron – Policies for Licensing Compliance

Conflict Management Policy

At Zaf'ron, the safety of staff, customers, and the wider community is paramount. We maintain a strict zero-tolerance approach towards violence, aggression, abuse, or discrimination.

1. Staff Training – All staff are trained in de-escalation techniques, conflict awareness, and the importance of calling 999 at the first sign of violence or serious threat. Refresher training is undertaken regularly, and records are kept.
2. Calling Police – In any violent or threatening incident, the first action must be to call the police (999). A panic alarm system is being considered to speed up this process.
3. Role of Door Supervisor – A licensed SIA Door Supervisor is on duty nightly from 23:00 until closing. They manage entry, monitor behaviour, and intervene when necessary. The Door Supervisor's details (name, SIA number, times on duty) are recorded in the log.
4. Incident Recording – All incidents are logged in the Incident Book, including details of what happened, who was involved, and any police attendance. CCTV footage is saved and backed up for each incident.
5. Staff Conduct – Staff must avoid physical engagement unless absolutely necessary to protect themselves or others. Any excessive use of force is not tolerated. All staff are reminded that their role is to de-escalate and call for assistance.

This policy is reviewed every six months to ensure best practice.

Dispersal Policy

Zaf'ron is committed to ensuring that customers leave the premises quietly and

without causing nuisance to neighbours.

1. Closing Routine – From 00:30 lights are gradually raised and customers are reminded politely that the premises will close at 01:00. Last orders are served in time to allow an orderly closure.
2. Door Supervisor Role – The Door Supervisor monitors the exit to ensure customers leave quietly, do not loiter, and respect neighbours. Any antisocial behaviour outside the premises is dealt with promptly.
3. Staff Instructions – Staff remind customers to disperse quietly, avoid shouting, and not to linger outside the restaurant.
4. Delivery Drivers – Drivers are instructed to wait inside the premises for orders, to turn off engines, and avoid loud conversations or use of horns.
5. Noise and Waste – Cleaning and waste disposal is carried out quietly inside after closing. Refuse is not taken out after 22:00; instead, it is stored indoors and disposed of in the morning.
6. Neighbour Engagement – Neighbours are provided with management contact details to raise concerns directly. All complaints are logged and addressed promptly.

This policy will be kept under review and updated as required to ensure it meets licensing objectives and community expectations.

Appendix E



