

Licensing Panel (Licensing Act 2003 Functions)

Date: **25 March 2026**

Time: **10.00am**

Venue: **Virtual**

Members: **Councillors:** Hewitt, Parrott and Thomson

Contact: **Francis Mitchell**
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AGENDA

1 TO APPOINT A CHAIR FOR THE MEETING

WELCOME & INTRODUCTIONS

2 PROCEDURAL BUSINESS

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

(b) **Declarations of Interest:**

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

In each case, you need to declare

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

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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 COSIES LICENSING PANEL (LICENSING ACT 2003 FUNCTIONS)

7 - 60

Contact Officer: Nadia Ioannou
Ward Affected: West Hill & North Laine

Date of Publication - Tuesday, 17 March 2026

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FURTHER INFORMATION

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

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Licensing Panel (Licensing Act 2003 Functions)

Brighton & Hove City Council

Subject:	Application for a New Premises Licence under the Licensing Act 2003		
Premises:	Cosies, 10 Dyke Road, Brighton, BN1 3FE		
Applicant:	Cosies (Brighton) Limited		
Date of Meeting:	25 March 2026		
Report of:	Corporate Director for City Operations		
Contact Officer:	Name:	Corinne Hardcastle	Tel: (01273) 294429
	Email:	corinne.hardcastle@brighton-hove.gov.uk	
Ward(s) affected:	West Hill & North Lane		

1. PURPOSE OF REPORT AND POLICY CONTEXT

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

2. RECOMMENDATIONS:

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

3. CONTEXT/BACKGROUND INFORMATION & CONSULTATION

- 3.1 The application is for a New Premises Licence under the Licensing Act 2003.

The application proposes: A 2 floor commercial premises with ground floor & basement. Seating will be provided for customers to enjoy food, alcoholic & non-alcoholic beverages on both floors including the small terraced area outside the front of the building, which is separated from the public footpath. The plan layout drawings are attached to this application for your reference

- 3.2 Part Section 18 (Operating Schedule) of the application is detailed at Appendix A and the plan of the premises is attached at Appendix B.

3.3 Summary table of proposed activities

	Proposed
Recorded Music	Tuesday to Friday 14:00 - 23:00 Saturday and Sunday 12:00 - 23:00
Supply of Alcohol	Tuesday to Friday 14:00 - 23:00 Saturday and Sunday 12:00 - 23:00 On and off the Premises
Hours premises are open to public	Tuesday to Friday 14:00 - 23:00 Saturday and Sunday 12:00 - 23:00

- 3.4** Special Stress Area: The premises falls within the Special Stress Area. This area is deemed an area of special concern in terms of the levels of crime, disorder, and public nuisance experienced within it. (See paragraphs 3.3 – 3.3.5)

Representations received

- 3.5** Details of the representations made are notified to applicants on receipt by the Licensing Authority using a pro-forma. A summary appears below:
- 3.6** 4 representations were received. They were received from a local business, Sussex Police, the Licensing Authority and 1 in support from the Freeholder. The representation from a local business was subsequently withdrawn following agreement to an additional condition.
- 3.7** Representations received had concerns relating to Prevention of Crime and Disorder, Public Safety, Prevention of Public Nuisance and Protection of Children from Harm
- 3.8** Full details of the representations are attached at Appendix C and additional conditions agreed with the Environmental Protection Team and a local business are attached at Appendix D. A map detailing the location of the premises is attached at Appendix E.

4. COMMENTARY ON THE LICENSING POLICY

- 4.1** The following extracts from Brighton & Hove City Council Statement of Licensing Policy are considered relevant to this application and **are numbered as they appear in the policy**:

1 Introduction

1.1 This Statement of Licensing Policy has been prepared in accordance with the provisions of the Licensing Act 2003 (the Act) and having regard to Guidance issued by the Home Office under Section 182 of the Act.

This policy takes effect from the 5 January 2026. The licensing authority is Brighton & Hove City Council.

The purpose of this statement is to promote the licensing objectives and set out a general approach to making licensing decisions.

The discretion of the licensing authority in relation to applications under the act is only engaged if 'relevant representations' are made by other persons or responsible authorities.

This policy will inform the approach to be taken when deciding applications and imposing conditions when relevant representations are received. It is also intended as a guide for applicants as to what to include in their operating schedules, always recognising that if no representations are received, the application must be granted.

The licensing authority must carry out its functions with a view to promoting the licensing objectives and this policy is framed around those objectives. Each application will be given individual consideration on its merit.

The scope of this policy covers the following:

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

1.2 The licensing objectives are:

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

1.3 Scope

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

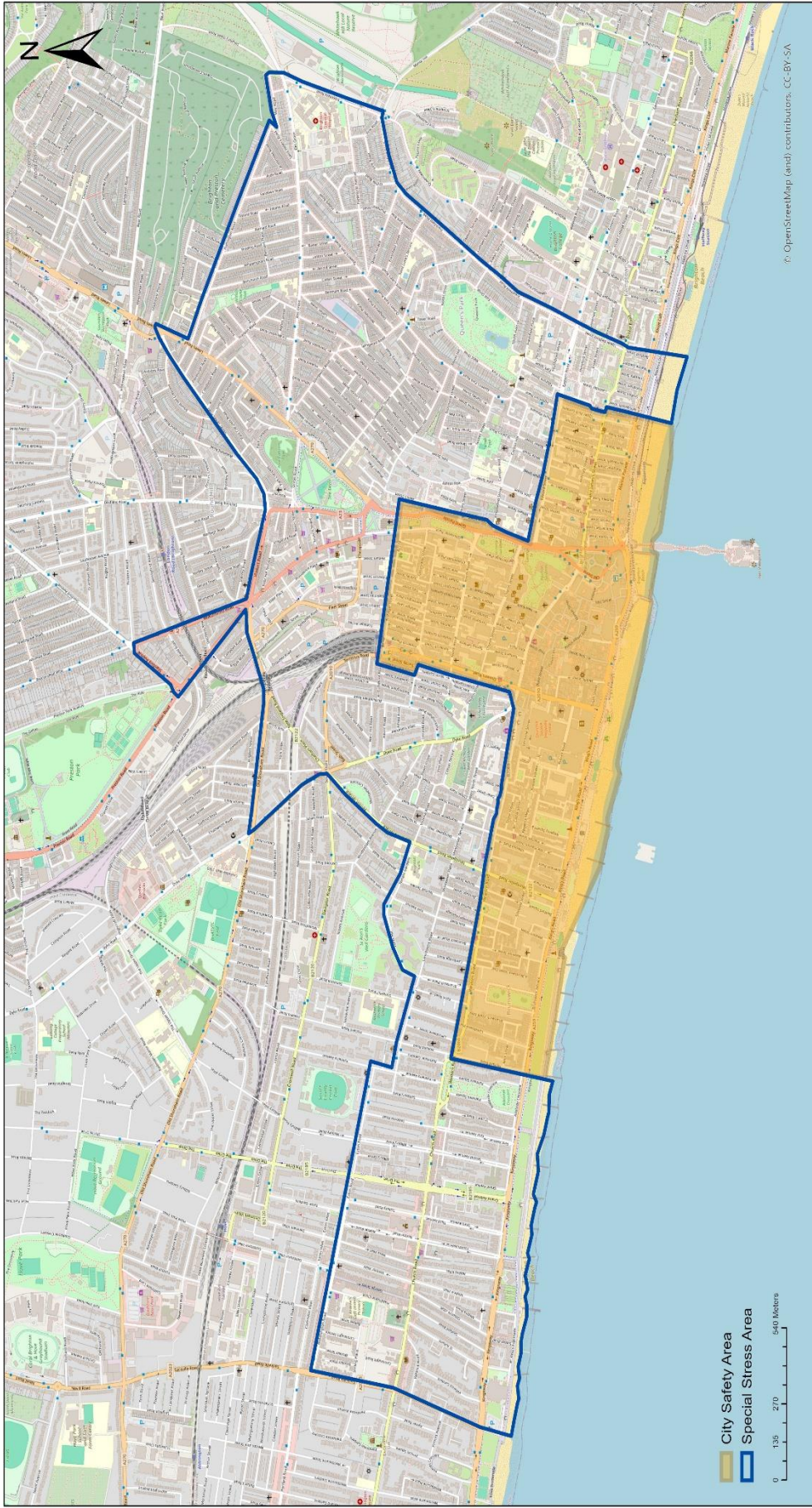
3. Special Policies and Initiatives

3.3 Special Stress Area

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

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

City Safety Area and Special Stress Area, July 2025



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

- 3.3.2 This Special Stress Area (SSA) is of concern to the licensing authority because of the relatively high levels of crime and disorder and nuisance experienced within it. The area will be kept under review.
- 3.3.3 For all new and varied applications for premises and club premises certificates within the SSA operators will be expected to pay special attention when drawing up their operating schedules and to make positive proposals to ensure that their operation will not add to the problems faced in these areas. Appendix A of the SoLP sets out a list of potential measures the licensing authority considers may be appropriate. These may be more or less appropriate depending upon the style of operation applied for.
- 3.3.4 On receipt of any application in the SSA, where a relevant representation has been made, the licensing authority will scrutinise the application carefully and will look at the measures proposed in the operating schedules and compare them to the measures set out in Appendix A, Licensing Best Practice Measures. Where

discretion has been engaged, those applications which fall short may be refused or conditions applied to comply with policy measures.

- 3.3.5 The Licensing Authority will keep the City Safety Area and Special Stress Area under review. Should the authority find that problems of crime and disorder or nuisance are not improving, or are worsening, the Special Policy will be reviewed.

3.4 The Matrix Approach

The Licensing Authority will support:

3.4.1 Diversity of premises: ensures that there is a mix of the different types of licensed premises and attracts a more diverse range of customers from different age groups, different communities and with different attitudes to alcohol consumption. It gives potential for positively changing the ambience of the city or an area of it. This will have a positive effect in reducing people’s fear of crime and in increasing the number of evening visitors to the city centre. The Community Safety and Crime Reduction Strategy [Community safety and crime reduction strategy 2023 to 2026](#) recognises that too many single uses in a confined area and patrons turning out onto the streets at the same time may create opportunities for violent crime and public disorder and therefore supports: mixed use venues encouraging a wider age balance.

3.4.2 A ‘Matrix’ approach to licensing decisions has been adopted and is set out below. It provides a firm framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success or otherwise to investors and businesses making applications. It underpins the City Safety Policy (see above at 3.1).

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

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

3.4.3 Explanatory notes on matrix

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

Food and dining venues	<ul style="list-style-type: none"> • Provide substantial table meals to customers dining at the premises • Food is prepared on site • Alcohol is sold to customers ancillary to a substantial table meal for consumption at the premises (or in an associated outdoor dining area) only • If takeaway service is provided, must be ancillary to provision of substantial table meals
Fast food premises	<ul style="list-style-type: none"> • Provide late night refreshment of fast food intended for immediate consumption on the premises or takeaway • Food is served in disposable packaging
Cafes	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises in addition to other food and drink products • Food and drink is served to customers seated at a table including to any outdoor designated area • Food is prepared on site and the premises will have a fully operational kitchen • A full menu of the hot and cold food items available will be clearly on display within the premises. • Generally operate in the daytime and early evening only.
Performance venues	<ul style="list-style-type: none"> • Provide performances of live music, theatre, dance and other creative arts to entertain an audience • Includes live music venues, concert venues, cabarets and theatres • Does not include karaoke or Grassroots Music Venues
Grassroots Music Venues	<ul style="list-style-type: none"> • Grassroots Music Venues are small, typically local venues that provide a platform for emerging and independent musicians to perform. They are often pubs, clubs, or other small spaces where artists can hone their craft, gain experience, and connect with a local audience. These venues play a crucial role in nurturing talent and supporting the development of the music scene. • A member of Music Venues Alliance Brighton or Music Venues Trust or similar
Nightclubs	<ul style="list-style-type: none"> • Provide regulated entertainment and the sale of alcohol • Main licensable activity is recorded and live music with provision of dance floors, sound systems and light displays • Generally, operate at night and into early hours of the morning
Public houses and bars	<ul style="list-style-type: none"> • Sell alcohol to customers for consumption on the premises

	<ul style="list-style-type: none"> • Sale of alcohol takes place at the bar • Includes tap rooms and craft beer pubs • May also carry out other licensable activities • Does not include cafes
Non-alcohol led venues	<ul style="list-style-type: none"> • Cultural venues such as art galleries, museums, theatres • Experiential entertainment venues such as escape rooms and social gaming venues • Alcohol is sold to customers for consumption on the premises • Supply of alcohol is ancillary to entertainment offering • Does not include shared workplaces and co-working offices
Off licences	<ul style="list-style-type: none"> • Supermarkets and convenience stores which supply alcohol for consumption off the premises in addition to other retail products • Includes alcohol delivery services fulfilling remote orders for sale of alcohol • Restrictions on ABV% e.g. the Sensible on Strength 6% condition
Shared workplaces, co-working offices	<ul style="list-style-type: none"> • Office premises in which individual workstations and meeting rooms are rented to solo workers and small businesses
Members' clubs	<ul style="list-style-type: none"> • Premises authorised to carry out licensable activities under a club premises certificate

3.4.4 **Each application will be considered on its own merits.** However, the Licensing Authority will apply the Matrix Approach in all cases unless there are exceptional circumstances which justify a different approach.

- a). **Applications within the CSA** will be subject to a special policy requiring robust measures to be included in the operating schedule to promote safety. Applications within the SSA will be subject to the special stress policy set out in 3.3.
- b). **Exceptional circumstances.** The Licensing Authority will determine exceptional circumstances on a case-by-case basis. An example of exceptional circumstances could be where the applicant has provided sufficient assurances to the responsible authorities that they do not make relevant representations against the application. Another example is where the application is for a variation to an existing premises licence and the applicant satisfies the criteria for a “good operator”.
- c). **Activities which the Licensing Authority values and wishes to encourage:** LGBTQ+ and TNBI venues; outdoor regulated entertainment; cafes; members’ clubs; traditional pubs (outside the CSA); non-alcohol led licensable activities, especially within the city centre. The Licensing Authority will aim to permit these types of venues in appropriate locations, but will consider each case – including any relevant representations – on its own merits.
- d). **Location.** Consideration will be given to the character of the area of the venue in every case. In residential areas, the Licensing Authority will pay particular

attention to the potential of a venue to cause public nuisance, especially noise disturbance, littering and anti-social behaviour. In these areas, an early closing time may be appropriate.

- e). **Food and dining venues.** The Licensing Authority will require conditions to ensure that these venues are food-led, such as: alcohol to be sold only to customers taking a substantial table meal; no takeaway service of food for immediate consumption (an ancillary meal delivery service is acceptable). Where the venue has an agreement to use an adjacent outdoor area, the Licensing Authority will require evidence that a pavement licence has been granted for use of the highway (for highway land) or landowner's consent (for land other than a highway).
- f). **Off licences.** Particular consideration will be given to applications for off-licences in areas which already have one or more off-licences in close proximity, due to concerns about street drinking, underage sales and anti-social behaviour. Where relevant representations are made raising these issues, the application is likely to be refused or – if it is appropriate to grant the application – granted subject to a terminal hour in line with neighbouring off licences.
- g). **Outdoor events.** Outdoor events will generally be supported where they have been arranged through the Council's event planning process.

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

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

3.7. **Off Licences**

In recent years there has been a noticeable shift towards more people buying alcohol from shops and drinking at home prior to going into premises such as pubs and clubs. The council is concerned that alcohol loading from off-licence sales is a significant problem in the city and adversely affects the licensing objectives as it gives rise to problems of drunkenness, disorderly behaviour and a higher risk of alcohol sales to children. Representations from the police, local residents and the director of public health at licensing panel hearings have

testified to these problems. Additionally, regular test purchasing carried out by Sussex Police in partnership with BHCC Trading Standards has identified that off licences continue to be a place where young people under the age of 18 can purchase alcohol illegally.

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

3.8 Alcohol Delivery Services

The Licensing Authority and Sussex Police have specific concerns around the delivery of alcohol off the premises due to issues around the end location of delivery, age verification checks (Challenge 25), the increased possibility of the alcohol coming into the CSA and SSA from other areas, as well as the personal safety of drivers when having to refuse a delivery at the end destination. Later hours also mean that persons can access further alcohol beyond what they

may be able to access in their local area. There are concerns around persons who are already intoxicated ordering more alcohol to continue their night.

- 3.8.1 Alcohol delivery poses a unique set of challenges as it often transfers the final age verification to a person who has no responsibility in relation to the premises licence which authorised the sale of alcohol. A premises licence holder needs to be satisfied that their drivers or the delivery drivers of the third party company they chose to use have received regular and comprehensive training in age verification and identifying persons who have consumed too much alcohol. Consideration may be given to using drivers employed directly by the premises as opposed to third party providers.
- 3.8.2 Evidence has shown that customers have previously used landmarks/businesses not related to them as addresses for delivery so that alcohol could be consumed in open spaces/parks. The risk being that this may lead to increased crime and disorder including anti-social behaviour and criminal damage, as well as the possibility that underage persons can gain access to alcohol. Concerns have also been raised about the delivery of alcohol to known street drinking hotspots. Therefore, a condition requiring all deliveries to be to a verifiable residential or business address and a face to face ID verification is vital in mitigating some of this risk.
- 3.8.3 While the Licensing Authority and Sussex Police recognise this is a growing area of business, new or variation applications to include the delivery of alcohol off the premises will be subject to increased scrutiny. Suggested conditions for the provision of an alcohol delivery service can be found at Appendix A1. These are not exhaustive and each application will be considered on its own merits.

3.10 Promoters and irresponsible drinks promotions

- 3.10.1 The Licensing Act 2003 makes no mention or provision for the use of promoters within licensed premises. Many of the late night bars and clubs within the Brighton & Hove area regularly hire promoters to sell nights at their venues. Issues that have been identified with the use of promoters within the nighttime economy, in recent years include individual promoters vouching for underage customers to get them inside licensed premises where they can access alcohol, providing flyers to passersby who throw them on the floor and irresponsible promotions for their nights. Many premises now have an agreement with their promoter for acceptable promotions and behaviour which includes the signing of a written contract of expectations. This shows premises evidencing their due diligence and ensures that promotion companies know what is expected of them. The contract could include obligations to pick up self-generated litter, verification of ages of their customers and users of their social media, promoters being over the age of 18 and responsible advertising on social media.
- 3.10.2 The Licensing Authority expect licensed premises to develop staff policy and training on recognising signs of drunkenness, spiking and vulnerability, for example, offering drinking water and tips for refusing customers who appear drunk. And discourage company policies that promote bonuses and sales incentives for selling alcohol. Licensing Authority will expect necessary precautionary processes to restrict drunkenness, e.g. Licensing Guidance states

happy hours should not be designed to encourage individuals to drink excessively or rapidly.

6. Prevention of Crime and Disorder

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

- 6.1.1 The licensing authority acknowledges that training and good management play a key part in preventing alcohol and drug related crime. The authority expects that all licensees of on-licensed premises attend training programs which will raise their awareness of the issues relating to spiking, drugs and violence in licensed premises, and that suitable training be extended to all bar staff and door supervisors so that drug dealers and users will be deterred from using licensed premises for illegal purposes and that incidents of violence in licensed premises will be reduced. Licensees are also encouraged to attend training programs to help identify children at risk and issues of basic child protection and vulnerable individuals. It is the duty of the designated premises supervisor (DPS) to train staff on induction concerning conditions on their premises licence and their responsibility to uphold all four licensing objectives.
- 6.1.2 It is expected that the DPS will spend a significant amount of time on the premises. When not on the premises it will be essential that the DPS is contactable, particularly should problems arise with the premises and that staff are authorised by the DPS
- 6.1.3 The location of violent attacks, anti-social behaviour and hate crime or related incidents may be used to justify closing times.
- 6.1.4 Measures put in place should support the intentions of Operation Marble (police operational order), which aims to prevent incidents of crime and disorder within the night time economy, at weekends. Operation Marble operates with a view to minimising the risk to the public of being a victim of public place violent crime; to reduce incidents of violent crime and public disorder within the city centre; to deal positively with offences and offenders; to secure and preserve evidence which will assist in the prosecution of offenders and to support the night time economy and the responsibly run businesses within it.

6.2 Sussex Police

- 6.2.1 Sussex Police have a specific Operation relating to the night-time economy called Operation Marble (detailed in 4.3.7) and work closely with partners to ensure a safe and vibrant city centre. Police data shows the correlation between intoxication and violent crime is highest in the city centre. There continues to be an increasing demand for resources further into the early hours of the morning with the highest sustained risk during the week occurring on a Friday into Saturday between 22:00 – 04:00 (with moderately high risk until 05:00) and a Saturday into Sunday between 21:00 – 04:00 (again with a moderately high risk

until 05:00). For full details of these statistics see the Police Data set at Appendix E.

- 6.2.2 The dealing and use of drugs remains an issue across the city and Sussex Police welcome proactive policies from licensed premises. A drug safe and seizure recording initiative is in place of which further details can be obtained by contacting Brighton & Hove Police Licensing (brighton.licensing@sussex.police.uk). This initiative encourages licensed premises with Door Supervisors to search and seize drugs from persons attempting to enter their premises and ensures that once drugs are removed from persons, they can be safely collected and destroyed by Sussex Police. We ask that licensed premises make regular contact with Police Licensing to get seized items collected.
- 6.2.3 Dispersal from the city centre during the late evening and early morning remains a policing challenge. Over recent years, there has been a proliferation of off-licences and late night refreshment venues offering walk in/take away services along the city's arterial routes. This has led to incident 'hot spots' where patrons from the night time economy continue to interact, albeit away from any safety measures afforded by on-licences. As such, Sussex Police support the Council's Special Policy in offering guidance to both applicants and the Licensing Committee in relation to off-licences and late night refreshment licences.
- 6.2.4 Sussex Police have continuing concerns that, despite staff training in age-restricted sales, under age individuals are still being served alcohol both on and off the premises in some of the city's licensed premises. As such, regular intelligence-led 'test-purchase' operations are conducted to highlight premises where sales are taking place and ensure appropriate enforcement action is taken to prevent further sales. The introduction of identification scanning machines at premises throughout the city has proved successful in mitigating some risk, but operators must maintain vigilance regarding the fraudulent use of genuine IDs. Sussex Police continue to work alongside the Brighton Crime Reduction Partnership (BCRP) to tackle the problem of those who use false or another's identification to enter licensed premises and purchase alcohol. The advent of digital identification means that the ID process is continually evolving. There is an expectation by Sussex Police and the Local Authority that licensed premises are proactive around staying informed and abreast of any changes and providing training / support to their staff as required.
- 6.2.5 Sussex Police work closely with venues and other organisations within the city to protect vulnerable people from becoming victims of crime. As well as work to prevent under age sales, vulnerability training is offered to identify persons who may have been made vulnerable through alcohol or drugs. Additionally, spiking awareness training has regularly been organised by the BCRP, the PCC and other external providers. Sussex Police also support initiatives such as (but not limited to) safe spaces, night safety marshals, mobile teams of volunteers actively checking people's well-being and the Beach Patrol.
- 6.2.6 Public Space Protection Orders have proved an effective tool for Sussex Police in targeting enforcement action in problem areas of the city. It *allows Police Officers and Police Community Support Officers to remove alcohol from any*

person in a public place if that person is involved in anti-social behaviour (ASB) or the officer believes that by having alcohol in their possession there is an increased risk of ASB. It is an offence to refuse to hand over alcohol when required to do so.' They have been particularly effective in the day time economy where members of the street community are causing ASB issues for members of the public and local businesses, especially during the summer months where there is a large influx of visitors to Brighton & Hove.

6.2.7 Policing the night time economy continues to provide a challenge and in the climate of limited resources and newly emerging problems, Sussex Police support maintaining a Special Policy in the city centre which defines areas of high crime and risk and offers restrictions around types of premises that will be granted to ensure that existing issues are not extended. Police will continue to take enforcement action where appropriate if the actions of a Premises Licence Holder, Designated Premises Supervisor, Door Supervisors or Staff have fallen below the high standard expected across the city. Sussex Police also recognise and support businesses which are aware of their social responsibilities and as such, actively contribute towards keeping Brighton & Hove a safe and enjoyable city.

6.3 Care, control and supervision of premises

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

6.3.2 The effective management and supervision of a venue is a key factor in reducing crime and disorder, both within it and outside. The police will consider the applicants, objecting to the application where appropriate. The police may suggest crime prevention measures in relation to, for example, the internal layout of the premises, closed-circuit television, help points, lighting and security staff. The police may ask for conditions which support such measures to be imposed when licensing applications are granted, eg type of licence, capacity, operating hours restrictions.

6.3.3 Following the grant of a licence, the management and supervision of the premises, in so far as it might impact on crime and disorder, will continue to be monitored. Particular attention will be paid to any licensed premises where there is evidence of criminal activity or any association with racist or homophobic crime. The licensing authority will keep itself well briefed on the nature, location and type of premises where alcohol related violence and disorder are occurring so it can take full account of the facts and avoid exacerbating problems as required by the Community Safety Strategy. Where licensed premises are found to cause nuisance or be associated with disorder or unreasonable disturbance, the review process may be invoked,

and powers of revocation or the imposition of conditions may be considered. Conditions may include use of closed-circuit television, licensed door supervisors and earlier closing times. Such action to restrict the operation may be taken for trial periods to allow businesses an opportunity to remedy existing disorder, nuisance or disturbance.

- 6.3.4 This policy recognises the use of registered Door Supervisors. All Door Supervisors will be licensed by the Security Industry Authority. Mobile security units and similar systems are in use by some premises operators as a means of providing security cover at very short notice at premises which may not normally require a permanent security presence. This policy endorses the use of units following such guidance and standards in appropriate circumstances.
- 6.3.5 The development of codes of practice and general operating standards for security companies is encouraged for local businesses; premises operators are urged to ensure that security services, when engaged, are provided by suitably qualified businesses operating to recognised standards and who should be working towards SIA accreditation.
- 6.3.6 Enforcement will be achieved by the enforcement policy appended (Appendix B).

7. Public Safety

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

- 7.1.1 The permitted capacity is a limit on the number of persons who may be on the premises at any time, following a recommendation by the relevant fire and rescue authority under the Regulatory Reform (Fire Safety) Order 2005. For any application for a premises licence or club premises certificate for premises without an existing permitted capacity where the applicant wishes to take advantage of the special provisions set out in section 177 of the 2003 Act, the applicant should conduct their own risk assessment as to the appropriate capacity of the premises. They should send their recommendation to the fire and rescue authority which will consider it and decide what the “permitted capacity” of those premises should be.
- 7.1.2 Normally in the city centre, pubs and clubs will be expected to operate using polycarbonate or toughened/shatterproof glass.
- 7.1.3 Conditions may be imposed in accordance with operating schedules to protect public safety including where justified:
 - a). provision of closed-circuit television and panic buttons.
 - b). use of shatterproof drinking vessels; bottles requiring use of toughened glass or reusable plastic should normally be required unless applicants can show exceptional reasons.
 - c). use of door supervisors, licensed by the Security Industry Authority.

- d). requirement of a minimum of a licensed door supervisor for every 100 customers in nightclubs and large city centre pubs or as indicated by risk assessment.
- e). occupant capacity conditions will be applied where appropriate.
- f). the provision of designated and suitably trained first aiders.

7.1.4 Where appropriate, licence holders or their authorised representatives will submit event safety plans and operating manuals, attend Event Planning Teams or Safety Advisory Groups and similar meetings prior to large events and shall be part of Event Liaison Teams during such events. Due regard shall be had to relevant guidance and publications including, for example: HSE approved code of practice for events.

7.1.5 **Preparing for Martyn's Law Requirements**

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

8. Prevention of Public Nuisance

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

- 8.1.1 In determining applications for new and varied licences, regard will be had to the location of premises, the type and construction of the building and the likelihood of nuisance and disturbance to the amenity of nearby residents by reason of noise from within the premises, as a result of people entering or leaving the premises or from individuals or groups of customers gathered outside (e.g. in order to smoke).
- 8.1.2 Applications for new licences or for the extension in size of licensed premises should not normally be granted if the premises will use amplified or live music and operate within or abutting premises containing residential accommodation except that occupied by staff of the licensed premises. A condition may be imposed on new licences that entertainment noise shall be inaudible in any residence. Noise emanating from within licensed premises should not normally be audible outside.
- 8.1.3 Installation of sound limiting equipment and sound insulation may be required to minimise disturbance to the amenity of nearby residents by reason of noise from the licensed premises.
- 8.1.4 Generally, regulated entertainment in the open air including tents and marquees should have a maximum closure hour of 2300. Earlier hours may be imposed in

sensitive open spaces or near residential areas. The Licensing Authority will have regard to Noise Council guidance.

8.1.5 In determining applications for new licences or extensions in hours or terminal hours of licensed premises, regard will be had to late night public transport availability and location of taxi ranks to aid dispersal of customers.

8.1.6 Reasonable controls are available to all premises operators to minimise the impact of noise from customers outside. The council's Environmental Health Department has issued guidance on a number of steps that can be taken in this respect which are endorsed by this policy (see 8.2 below).

8.2 Smoking Advice

8.2.1 Premises licence holders will be expected to:

- Develop a management plan on how to manage smoking on their premises and ensure that all staff are aware of the contents of this plan, and that it is effectively implemented. Noise from people smoking and talking can be intermittent, vary in character and volume and be intrusive. An effective smoking management plan will help prevent neighbours being disturbed.
- Comply with any planning conditions restricting the use of outdoor areas.
- Ensure that any structures used by smokers comply with the design criteria detailed in the Health Act 2006 and that any structures, awnings, retractable canopies, etc have the relevant planning permission.
- Ensure any new lighting to outdoor areas must be designed so as not to cause a light nuisance to neighbours and again have the relevant planning permission and building control consent.
- Ensure that the conditions on the premises licence are complied with. There may be conditions restricting the hours of use of gardens and outdoor areas. Having reviewed the contents of the premises licence it may be necessary to request a variation of your licence.
- Licence tables and chairs on the Public Highway under the provisions of the Highways Act 1980. These licences may have conditions restricting the times that the area can be used.
- Ensure drinks, glasses and bottles are not taken onto the highway unless there is a tables and chairs licence permitting use. A system should be adopted to prevent theft and 'spiking' of drinks and reminding customers not to leave unattended items.
- Discourage smokers remaining in gardens and outdoor areas and determine terminal hours.
- Discourage smokers remaining outside by removing/disabling tables and chairs or prohibiting their use after a certain time. Lights and heaters will also be turned off.

- Introduce a system that after a certain time the number of smokers outside are restricted to a maximum number. Staff will be needed to manage this restriction.
- Employ staff and/or SIA registered door supervisors to manage doors and control customers and smokers entering and leaving the premises. Staff positioned on the doors can help to encourage customers not to cause a noise problem. It may be that staff are required to manage doors after a certain time, particularly during the hours when neighbouring residents are trying to sleep.
- Ensure door supervisors maintain order outside venues and protect customer safety. BCRP supports the use of Night Safe. Radio net and other pager systems and pub watch schemes can be used to provide for rapid police response and alert other venues where customers and staff are endangered.
- Position signs to remind customers that the premises is in an area where people live. It is not always obvious in busy commercial streets with flats above. By changing the design and wording of signs customers do not forget. Signs can be located in and outside the premises and on tables.
- Use CCTV to manage outside areas.

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

9. Protection of Children from Harm

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

- 9.1.1 Licensees should note the concern of the authority that drink related disorder frequently involves under 18's. To prevent illegal purchases of alcohol by such persons, all licensees should work with a suitable 'proof of age' scheme and ensure that appropriate identification is requested prior to entry and when requesting alcohol, where appropriate. Appropriate forms of identification are currently considered to be those recommended by the Home Office, police, trading standards officers and their partners (eg passport, photo driving licence or pass card). The advent of digital identification will bring new technologies and challenges which responsible authorities and licensees will need to be mindful of and have a personal responsibility to remain informed and trained on.
- 9.1.2 It is the licensing authority's expectation that all staff responsible for the sale of intoxicating liquor receive information and advice on the licensing laws relating to children and young persons in licensed premises. Licensed premises staff are required to take reasonable steps to prevent under age sales. The licensing

authority will not seek to limit the access of children to any premises unless it is necessary for the prevention of emotional or psychological harm to them. Each application will be considered on its own merit but particular areas that will give rise to concern in respect of children are to be found in section 9.1.4 below.

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

a). Police should exercise powers (Confiscation of Alcohol (Young Persons) Act 1997) to remove alcohol from young people on the street

b). Police and trading standards should implement test purchasing to reduce sales to under 18s in on and off sales licensed premises

c). Further take-up of proof of age schemes will be promoted

d). In-house, mystery shopper type schemes operated by local businesses will be supported

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

f). Use of a PSPO in the City Centre

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

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

Options may include:

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

9.1.6 Where children are expected to attend a public entertainment, appropriate adult supervision will be required to control the access and egress of children and to protect them from harm. This will normally be an adult member of staff for every 100 children. Where the entertainment is music and dancing, 2 persons, licensed by the Security Industry Authority (door supervisors) should be employed for

every 100 children but will be subject to advice within the Event Safety Guide. Nothing in this policy shall seek to override child supervision requirements contained in other legislation or regulations. For exclusively under 18 events reference should be made to police guidelines (available from the Police Licensing Unit, Brighton tel. 101). The licensing authority recognises the Director of Children's Services as being competent to advise on matters relating to the protection of children from harm. Applicants shall copy their applications to the Director of Children's Services in its capacity as the responsible authority. Copies should be sent care of the Police. The "What to do" booklet is a national one and can be accessed at: www.brightonandhove.scb.org.uk/wp-content/uploads/What-to-do-if-a-child-is-being-abused.pdf If you are concerned about a child locally to contact the Multi-Agency Safeguarding Hub (MASH) on 01273 290400, or you can contact Sussex Police on 101. If they think a child is in immediate danger to dial 999.

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

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

9.1.9 Trading Standards also supplies business support materials guidance and advice on the enforcement penalties on all age restricted products for example vapes, tobacco, fireworks etc.

10. Integration of Strategies

10.1 The licensing authority shall secure the proper integration of this policy with local crime prevention, planning policy, transport, tourism and cultural strategies by: -

- Liaising and consulting with Sussex Police, Community Safety Partnership Board, sustainability commission representatives and following the guidance in community safety and crime and disorder strategy
- Liaising and consulting with Public and Drug and Alcohol Programme Board
- Liaising and consulting with the East Sussex Fire & Rescue Service
- Liaising and consulting with the Safety Advisory Group (Emergency Planning)
- Liaising and consulting with the Planning authority
- Liaising and consulting with the Highways authority
- Liaising and consulting with local business and business associations. Having regard to any future documents issued relating to the Private Security Industry Act 2001, for example liaison or information sharing protocols
- Liaising and consulting with the Trading Standards Team, for example with regard to test purchasing codes of practice

10.1.1 In line with statutory requirements and the council's Public Sector Equality Duty, the Licensing Authority shall have due regard to the need to eliminate unlawful

discrimination, and to promote equality of opportunity and positive relations between all people. This includes people who share protected characteristics, including but not limited to LGBTQIA+ people, disabled people, people from diverse ethnic and cultural backgrounds and people of all faiths and none.

10.1.2 This policy supports the aims of the tourism strategy, recognising the benefits for the tourism economy of creating a safer and more attractive city centre and improving competitiveness with other European cities. The Licensing Committee should receive any reports relevant to the needs of the local tourist economy and the cultural strategy for the area to ensure that it considers these matters.

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

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

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

10.3 Enforcement

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

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

- Community Safety & Crime Reduction Strategy
- Drugs and alcohol strategies – local alcohol harm reduction strategy

- Objectives of the Security Industry Authority
- The Anti Social Behaviour Act 2003/ASBPC Act 2014
- The Health Act 2006
- The Violent Crime Reduction Act 2006
- Policing and Crime Act 2009

APPENDIX A – Licensing Best Practice Measures

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

Matters that would normally be expected in operating schedules:

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

Items to which positive consideration would be given:

- membership of Brighton Crime Reduction Partnership
- use of 'NightSafe' radio system or similar accredited scheme
- regular training and reminders for staff in respect of licensing legislation, policies and procedures; records of which should be properly recorded and available for inspection

- records of regular checks of all parts of the premises in relation to drug use
- systems in place to ensure details of barred clients are exchanged with other operators
- giving an agreed minimum notice of special events (screening of major sports events, birthday parties, adult entertainment, etc.) to relevant authorities and use of appropriate additional measures at such events
- Staff should be aware of their responsibilities regarding smoke-free legislation and for monitoring compliance

Recommend best practice for both on and off premises

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

5. FINANCIAL & OTHER IMPLICATIONS:

Financial Implications:

- 5.1 The licensing Act 2003 provides for fees to be payable to the licensing authority in respect of the discharge of their functions. The fee levels are set centrally at a level to allow licensing authorities to fully recover the costs of administration, inspection and enforcement of the regime.

Finance Officer Consulted David Wilder

Date: dd/mm/2026

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: 16/03/2026

Equalities Implications:

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

Sustainability Implications:

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

SUPPORTING DOCUMENTATION

Appendices:

1. Appendix A – Section 18 (Operating Schedule)
2. Appendix B – Plan of Premises
3. Appendix C – Representations
4. Appendix D – Additional conditions agreed with Environmental Protection and a local business
5. Appendix E – Map of area

Documents in Members' Rooms

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026
[Statement of Licensing Policy 2026](#)

Home Office, Revised Guidance issued under section 182 of the Licensing Act 2003, February 2026 [Revised guidance issued under section 182 of Licensing Act 2003 - GOV.UK](#)

Public Health Framework for Assessing Alcohol Licensing – July 2025
[Public Health Framework for Assessing Alcohol Licensing | Tableau Public.](#)

Background Documents

Brighton & Hove City Council, Licensing Act 2003: Statement of Licensing Policy 2026.
[Statement of Licensing Policy 2026](#)

Appendix A

Section 18 of 21

LICENSING OBJECTIVES

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

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

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

b) The prevention of crime and disorder

- operating hours are limited, no service hours after 23:00
- CCTV cameras will be used within the premises, with footage stored & retained for 28 days and available to the authorities upon request
- no alcohol will be sold to individuals deemed to be intoxicated
- zero tolerance policy to antisocial behaviour

c) Public safety

- Fire safety equipment installed and maintained in line with Fire Authority guidance
- exits and escape routes are clearly visible & accessible
- occupancy levels will be monitored to prevent overcrowding

d) The prevention of public nuisance

- off-trade sales will be sealed, no opened products will be allowed to leave the premises boundary
- opening times limited, no service after 23:00
- customers actively encouraged to leave quietly to respect neighbours

e) The protection of children from harm

- challenge 25 policy adopted
- all staff trained in refusing sales to under-18's including those attempting to use false identification
- accepted identification limited to passports & driving licenses

Section 19 of 21

NOTES ON DEMONSTRATING ENTITLEMENT TO WORK IN THE UK

About Cosies Bar & Taproom:

Cosies Bar & Taproom aims to provide a community-based, relaxed venue for people of all walks of life to hang out, make new friends, enjoy music & conversation alongside a high-quality alcoholic or non-alcoholic beverage.

As a small, intimate venue specialising in independent craft beer and high-quality wines & spirits, Cosies ethos is centred around providing an enhanced customer experience.

Situated on the cusp of the CSA but within the SSA, management of Cosies are aware of the risks & impact that the venue can have on the community & the licensing objectives. It is believed a venue of this style, which differs from most within the area & is intended to be a hub of positivity and inclusivity, will have a positive contribution on the area as opposed to having a negative cumulative impact.

The venue and its leaseholder are committed to upholding and promoting the licensing objectives. Ongoing co-operation & collaboration with the authorities, the continuous training of all employees alongside the implementation the following measures are proposed to achieve these objectives:

- Compliance with all measures under the heading “Matters that would normally be expected in operating schedules” in the CSA & SSA laid out in Appendix A - Licensing Best Practice Measures
- Compliance with all measures under the heading “Items to which positive consideration would be given” in the CSA & SSA laid out in Appendix A - Licensing Best Practice Measures
- Compliance with measures 1,2,4,5 & 6 under the heading “Recommend best practice for both on and off premises” in the CSA & SSA laid out in Appendix A - Licensing Best Practice Measures, with further discussion and collaboration between the premises management & the authorities to agree and define point 3 prior to implementation
- Substantial food to be available to customers between 12:00 - 20:00. The initial plan is to partner with a local catering business (within 400ft of Cosies) to provide the food. Menu's will be placed on all tables for customers to order from, with the food delivered to their table. In the future, Cosies may look to collaborate with guest caterers to prepare the food on-site, for a fixed short-term duration (typically for 1 weekend)
- A “bring your own food” policy will be enabled and actively promoted to customers for exceptional circumstances in any case where the core food offering is unavailable, or for those with specific dietary requirements, to ensure customers are able to eat a substantial meal at all times
- Vertical drinking will not be permitted within the premises - all customers to be seated whilst consuming alcohol
- Ongoing training of all staff to raise awareness on key issues including drugs, violence, spiking & prevention of harm to children
- DPS to spend significant time on the premises and will be contactable at all times when not on the premises
- Forecourt to be actively managed during trading hours, with regular sweeps to prevent loitering & reduce build up of rubbish
- Installation of a digital system to Sussex Police standards, ensuring the external forecourt is fully covered
- Removal of all external furniture by 22:00 to discourage customers and non-customers from congregating
- Limit on number of smokers permitted outside after 22:00, with no drinks permitted outside after this time
- Implementation of a robust policy around anti-spiking, including staff training to spot signs of spiking and providing drink covers

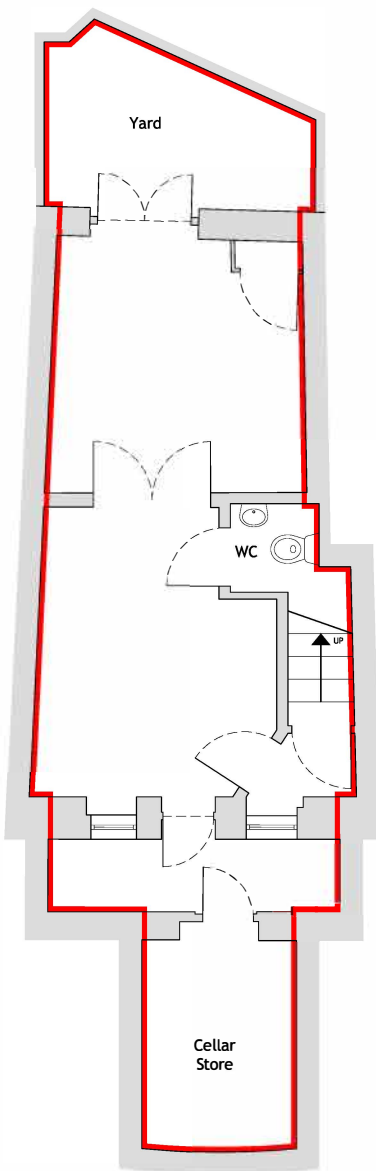
- Signing up to the Ask for Angela safety initiative (<https://askforangela.co.uk/>)
- Documentation of an Equality and Inclusion policy demonstrating a commitment to a fair and safe environment for all communities
- Developing a written plan for how customers will leave the building quietly, including signage and staff directing guests away from residential areas
- Implementation of a strict Challenge 25 policy with prominent signage and the documentation of a refusals log
- All staff must be trained to recognise early signs of intoxication and use a documented "Refusal of Service" policy
- Become a member of the Brighton Crime Reduction Partnership (BCRP) and using the "NightSafe" radio system
- Detailed, inspectable records of all staff training to be maintained

Additional measures which the application would be open to further discussion over:

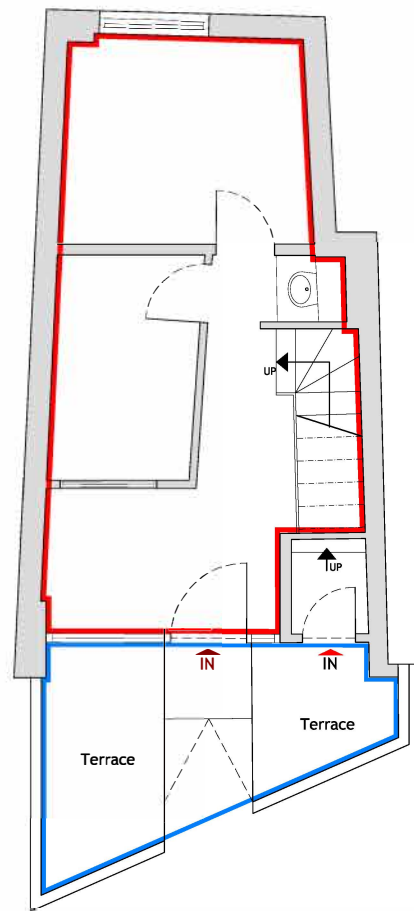
- Limiting of off-trade sales by a number of potential metrics (ABV cap, products produced in a defined Geographic location, limit of sales per day per customer etc)
- Reduction of operating hours, to be re-visited with the authorities at a later date (6 months post grant of licence)

About the applicant

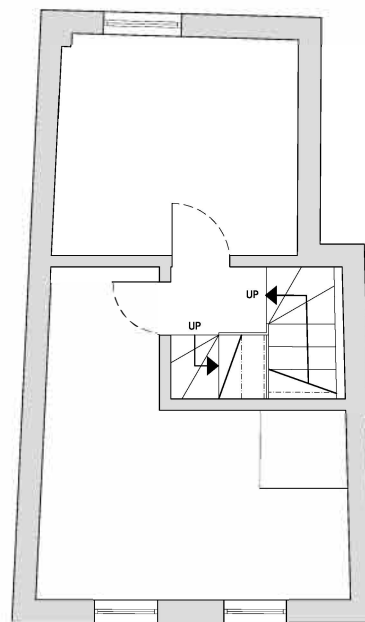
- Business Management graduate, with a working background in Hospitality and Construction-related sales supporting local authorities, Education & Healthcare bodies, the MoD and more
- Positive influence in the local community as an active mentor to students at the University of Brighton alongside previous volunteer work with Off the Fence, a charity which supports homeless people in Brighton & Hove
- Craft beer enthusiast and student of Brewing theory, looking to share a wide variety of beverages with like-minded fans of independent craft beer
- Born in Brighton and has spent the vast majority of their life living within the City. Is aware of the City's culture, values, changing landscape and trends



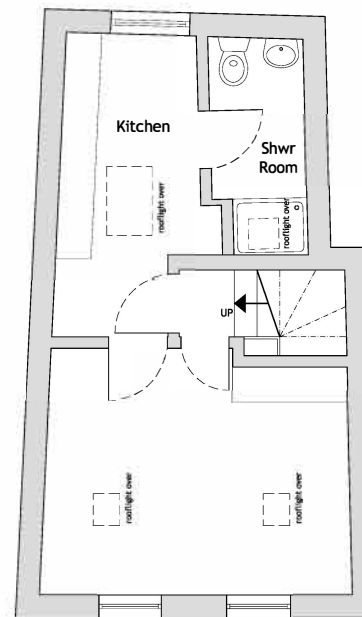
-01 Basement Plan



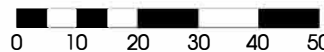
+00 Ground Floor Plan



+01 First Floor Plan



+02 Second Floor Plan



+LP Location Map 1:1250



Printing Notes - This document is A4 Size
To print this document accurately to the intended
scale, ensure that print settings are set to 'Actual
Size' or 'No scaling'. Do not print 'Fit to page'
Drawings not for construction.



Appendix C

REP A

From: Brighton Licensing <Brighton.Licensing@sussex.police.uk>
Sent: 13 February 2026 14:31
To: Corinne Hardcastle <corinne.hardcastle@brighton-hove.gov.uk>; EHL Licensing <ehl.licensing@brighton-hove.gov.uk>
Subject: Representation - Cosies Bar & Tap Room, 10 Dyke Road, Brighton

CH CON END 25.02.2026 VALID PCD, PPN and PCH (A)

Dear Corinne Hardcastle,

Re: New premises licence application for Cosies Bar & Tap Room, 10 Dyke Road, Brighton, BN1 3FE under the Licensing Act 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the above premises licence application on the grounds that the prevention of crime and disorder, prevention of public nuisance and protection of children from harm licensing objectives are not being promoted should this licence application be granted. We also refer to the Brighton & Hove City Council Statement of Licensing Policy Jan 2026 (SoLP) and the Public Health Framework for assessing alcohol licensing July 2025.

This is a new licence application in an area of the city which is subject to a Special Policy adopted by Brighton & Hove City Council. The premises lies in the Special Stress Area (as defined in the SoLP) and seeks the following hours and licensable activities:

Supply of alcohol – on and off sales:

Tuesday through to Friday: 14:00 – 23:00

Saturday through to Sunday: 12:00 – 23:00

Provision of recorded music – indoors:

Tuesday through to Friday: 14:00 – 23:00

Saturday through to Sunday: 12:00 – 23:00

Hours premises are open to the public:

Tuesday through to Friday: 14:00 – 23:00

Saturday through to Sunday: 12:00 – 23:00

The general description of the premises given within the application is a 2 floor commercial premises (ground floor and basement). Seating provided to customers to enjoy food, alcoholic, and non-alcoholic beverages on both floors and within a small terrace area outside to the front of the building.

Following us consulting with the applicant once the application was submitted, Sussex Police are unable to support this application over concerns that the venue is to be run predominately as a wet led venue (bar) as opposed to a food style operation. Although the premises sits within the Special Stress Area (SSA), it is right on the dividing line between the SSA and the City Safety Area (CSA) and very much within the city centre location. Less than 2-minute walk from the proposed premises, you find yourself in Churchill Square, West Street, North Street and Queens Road. All of which sit within the CSA. The location is saturated with licensed venues: pubs, bars, clubs, off licences, cafes, restaurants, and fast-food outlets. Permitting more is likely to increase the negative impact, especially licenses focused on alcohol provisions.

Brighton & Hove City Council Statement of Licensing Policy Jan 2026 (SoLP):

The Brighton & Hove City Council Statement of Licensing Policy has recently gone through a full public consultation review with the new revised edition going live in January of this year. Much of the policy decision within it is based around updated crime data supplied by Sussex Police.

As we have mentioned, the premises sits within the Special Stress Area as defined within the policy.

Section 3.3.2 states: This Special Stress Area (SSA) is of concern to the licensing authority because of the relatively high levels of crime and disorder and nuisance experienced within it. The area will be kept under review.

The Matrix Approach within the policy does support a bar / café / restaurant within the SSA however, due to the very central location, the crime data we provide below, evidences the points under section 3.3.2.

Within the application, the applicant makes no reference to this local policy and although not a requirement under the Licensing Act, is seen as good practice, to pre consult with the responsible authorities. Had this been done, we could have raised all our concerns prior to the application being submitted. Additionally, section 18 of the application, part which gives the applicant the opportunity to display how they will promote the licensing objectives and gives us the opportunity to see what risks they have considered is very limited in detail. Policies around spiking, vulnerability and conflict management are all missing from the application. Yes, these could be added now that it has been brought to the applicant's attention, but why were these risks not considered beforehand.

Communication with the applicant:

As mentioned, there was no pre consulting with Sussex Police however, once we had sight of the application, we did reach out to the applicant to ask several questions. This was to assist us in gaining a more informed awareness of the operation they are planning to operate. What we ascertained from this, is that the venue is going to be more of a drinking one rather than food led.

During this we established that food has been included in the description as a possible future option. For now, any food options would be by them sourcing this from a third-party off-site operator such as a local pizza restaurant. The applicant informed us that as the operation will predominantly be around the provision of alcohol, the later in the day trading hours are being applied for as opposed to being open from the morning to be more like a cafe.

We feel that even if a condition that substantial food would be available at all times i.e. café style, rather than it being a requirement to have alongside an alcoholic drink i.e. restaurant style, this venue is going to be wet led and operated as a bar. Any food offering would be very limited in choice and as possibly not investing in a kitchen and chef, not overly promoted.

Crime data & Public Health Framework for assessing alcohol licensing:

12-month period: 12th Feb 2025 – 11th Feb 2026

Within a 200-meter radius of the premises we have the crime data recorded as being: 209 violence against the person, 129 public order offences 38 robbery, 36 drug offenses and 20 sexual assaults. There were also 955 thefts recorded; however, this would also include shoplifting which would not be a consideration for this application.

We acknowledge that not all of these will be linked to alcohol and licensed premises however, with these crime types alcohol often plays a part, be that being under the influence of alcohol and causing crime or becoming the victim due to the persons intoxication level.

Currently we unable to provide data of crime reports based on alcohol consumption within the 200-meter radius, we can however do this for the relevant ward as a whole, this being a larger area.

Regency Ward: 509 crimes recorded where intoxication played a part. In addition to this, 147 crimes recorded against persons intoxicated and being the victim and 27 with the victim under the influence of both alcohol and drugs. Total of 683 alcohol related crime reports.

When comparing the above with the Public Health Framework for assessing alcohol licensing, Regency ward is ranked top out of 23 wards for sexual offences and injury caused by violence. Its also ranked 2nd highest for violence against the person, non-injury assaults, and criminal damage.

The above data fully backs the local policy around the SSA and the statement that it has relatively high levels of crime and disorder and nuisance experienced within it. It's for this reason we are unable to support a new licence in this location that would enable it to operate as a bar rather than food focused with alcohol ancillary to that.

Further considerations are the additional safeguarding initiatives that operate within the city such as Beach Patrol, Safe Space and Night Safety Marshals. Some of which

are operated by volunteers and supported financially by Sussex Police. Without these organisations in operation, the figures above would be even higher and the fact we need these initiatives within our city, further evidences the negative impact alcohol has.

Off Sales:

When considering the off sales element of the application, there is limited control the licence holder will have once the drinks have left the premises. There is then a risk of proxy sales to both under 18's and persons that could already be intoxicated. Consuming in public spaces causing ASB or mixing alcohol consumption with the sea if they head to the beach which is not something we can promote. We have seen persons lose their lives in Brighton & Hove as well as other parts of the country in coastal resorts due to misadventure, by way of being intoxicated and then getting into difficulty in the water.

Conclusion:

We are unable to support this application and are seeking refusal. We did offer the applicant an option of looking at a restaurant licence in that alcohol is ancillary to a table meal, but this was declined. Also suggested was to seek out a venue that might be on the market that already holds a licence with conditions and operating schedules that might suit the trading style he is aiming for.

We believe there will now be a panel hearing and if following that, the panel are satisfied that by granting a licence they believe there will be no negative impact on the licensing objectives, we have included several conditions that we ask them to consider adopting. They are focused on a café style operation as food was mentioned in the original application however, the panel members will need to have confidence in the applicant being able to adhere to such conditions, as the availability and the promoting of food is key. Reduced trading hours is also suggested to 22:00 and on sales only to bring it in line with policy.

Taking into consideration our comments above along with the crime data provided and the offer of a restaurant style licence that we could have supported being declined, Sussex Police are seeking refusal and invite the Licensing Authority to seriously consider this.

Yours sincerely,

REDACTED

Sgt Mark Redbourn o.b.o Insp Ben Morrison
Operations, Planning & Events (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police



REDACTED
Police Licensing Officer
Level 4 PALO Qualification

Brighton & Hove Licensing
John Street, Brighton.
REDACTED

Cosies Bar & Tap Room – Police proposed conditions – Café Style

General:

1. Authorised staff employed by Sussex Police in the role of licensing officer shall have the right of access to the licensed premises during hours of operation for the purpose of inspection of the premises and premises records in order to ensure the promotion of the licensing objectives.
2. The on sale of alcohol shall be consumed by persons seated at tables via waiter/waitress service with no vertical drinking.
3. An onsite operational kitchen should be in place with substantial food available at all times alcohol is offered for sale.
4. At all times, food menus must be clearly displayed and include a selection of hot food options.
5. Alcohol is ancillary to other hot and cold non-alcoholic beverages available.
6. No beer, lager, cider or perry with an ABV 6% or above shall be sold save that this shall not apply to premium beer, lager, cider or perry with an ABV 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.

Prevention of Crime and Disorder:

5. 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. This can be via email - 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.

6. a) An incident and refusals log (book or electronic) will be maintained showing a detailed note of incidents and refusals that occur in the premises. The logs will be inspected and signed off by the Designated Premises Supervisor (or a person with delegated authority) at least once a month.

b) The logs should be kept on the premises for at least twenty-four (24) months 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. Refusals of alcohol for reasons such as underage, no ID and intoxication.

7. The premises will become a member of the Brighton Crime Reduction Partnership (BCRP) 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. SIA licensed door supervisors shall be employed on any occasion 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 consider information or guidance offered by the police and also considering 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.

Public Safety: -

Prevention of Public Nuisance: -

Protection of children from harm:

9. The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.
10. Signage advertising the "Challenge 25" policy will be displayed in prominent locations.
11. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training

will take place prior to the selling and or serving of such products and will include:

*The lawful selling of age restricted products:

Including but not limited to, the requirement for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place.

*Vulnerability and Spiking.

*Conflict management.

*Refusing the sale of alcohol to a person who is drunk

(b) 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.

(c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.



RESPONSES FROM APPLICANT TO POLICE REPRESENTATION

Cosies Bar & Tap Room – Police proposed conditions – Café Style 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. - **agreed**
2. The on sale of alcohol shall be consumed by persons seated at tables via waiter/waitress service with no vertical drinking. - **agree with no vertical drinking, preference for customers to visit service area and carry drinks to their seats. I believe this will have no negative impact on the licensing objectives**
3. An onsite operational kitchen should be in place with substantial food available at all times alcohol is offered for sale. - **agree to substantial food offering, but in line with the timings and external provision options detailed in the appendix document. I believe this offers more options to the customers and a more reliable source of food provision vs managing the food provision “in-house”, as well as providing a more streamlined, fluid business model. I also believe that the medium-long term plan of having potential guest caterers will provide a big attraction to customers - quite often people will visit similar establishments specifically for the guest caterers food, meaning on future occasions there may be days where the business is more food-led**
4. At all times, food menus must be clearly displayed and include a selection of hot food options. - **agreed**
5. Alcohol is ancillary to other hot and cold non-alcoholic beverages available. - **not agreed**
6. No beer, lager, cider or perry with an ABV 6% or above shall be sold save that this shall not apply to premium beer, lager, cider or perry with an ABV 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event. - **agreed**

Prevention of Crime and Disorder:

5. Subject to GDPR guidance and legislation: **agree to the requirements laid out in point 5 to promote this licensing objective** (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. This can be via email - 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.

6. a) An incident and refusals log (book or electronic) will be maintained showing a detailed note of incidents and refusals that occur in the premises. The logs will be inspected and signed off by the Designated Premises Supervisor (or a person with delegated authority) at least once a month. **Agreed**

b) The logs should be kept on the premises for at least twenty-four (24) months 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. Refusals of alcohol for reasons such as underage, no ID and intoxication. **Agreed**

7. The premises will become a member of the Brighton Crime Reduction Partnership (BCRP) 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. **Agreed**

8. SIA licensed door supervisors shall be employed on any occasion 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 consider information or guidance offered by the police and also considering 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. - **I would appreciate further discussion on this point**

Public Safety: - Prevention of Public Nuisance: - Protection of children from harm:

9. The premises will operate a "Challenge 25" policy whereby any person attempting to buy alcohol who appears to be under 25 will be asked for photographic ID to prove their age. The recommended forms of ID that will be accepted are passports, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards or proof of age cards bearing the 'PASS' mark hologram. The list of recommended forms of ID may be amended or revised with the prior written

agreement of Sussex Police, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it. **agreed**

10. Signage advertising the "Challenge 25" policy will be displayed in prominent locations. **Agreed**

11. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling and or serving of such products and will include: *The lawful selling of age restricted products: Including but not limited to, the requirement for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place. *Vulnerability and Spiking. *Conflict management. *Refusing the sale of alcohol to a person who is drunk (b) 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. (c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request. **Agreed**

Wednesday 4th March 2026

Subject: Premises Licence Application – Cosies, 10 Dyke Road, Brighton, BN1 3LE

Dear Mark,

Thank you for your representation and for the continued dialogue in respect of our premises licence application.

Previously I've shared an appendix document with you, highlighting the measures the premises will implement to promote the licensing objectives, but I wanted to pick out and expand on a few of these which are more relevant to the concerns you have raised, in the hope that we might come to an agreement. We fully recognise the importance of promoting the licensing objectives, particularly the prevention of crime and disorder, and we are keen to work constructively with Sussex Police to address any concerns.

By way of clarification, the premises:

- Proposes hours of 14:00 – 23:00 on weekdays, 12:00 – 23:00 on weekends
- Will operate with a maximum capacity of 50 persons (including staff)
- Will be fully seated with no vertical drinking
- Will close the outdoor area at 22:00, with no amplified music externally

Our intention is to operate as a small, seated craft beer house with structured and genuine food provision, not as a high capacity or late night wet-led bar.

To provide reassurance, we are willing to incorporate a clear food condition, together with robust operational conditions including CCTV, challenge 25, incident and refusals log and a pricing structure that does not encourage excessive alcohol consumption.

Our appendix details that substantial food shall be available between the hours of 12:00 - 20:00 on the premises, as is common practice for many establishments where food and drink are complimentary to each other for the food provision to finish a few hours prior to premises closure. Our food offering is now backed by an agreement in principle with a named local food provider, which will consist of the following:

- Menu's placed on all tables for customers
- Customers can scan a QR code to place their order at their table, or order at the premises counter, based on preference
- Food will be delivered to the customer at their seat
- Food prepared by a long-standing, established catering specialist

We are confident that the above offering enables our potential customers to order and consume food whilst remaining seated in our premises, with minimal fuss, as they would if the food was prepared on site. Furthermore, by partnering with a catering specialist with a reputation for high-quality food, we believe customers will be drawn in by the food provision, as well as be more inclined to consume food, vs. an in-house alternative. Finally, we firmly believe this model of partnering with an established catering business gives continuity of supply to our premises and it's customers vs an in-house model, off-setting risks such as staff illness (particularly in-house chefs) to our proposed food provision model.

We believe these measures appropriately and proportionately address the licensing objectives and would welcome confirmation as to whether, subject to agreed wording, Sussex Police would be prepared to withdraw their objection as we are keen to resolve matters without/in advance of the hearing if possible.

Kind regards,

Harvey Siney
Director, Cosies (Brighton) Limited

From: Brighton Licensing <Brighton.Licensing@sussex.police.uk>

Sent: 12 March 2026 14:09

To: REDACTED

Subject: RE: Cosies Licence Application - clarifications around food provision

Afternoon Harvey,

Thank you for the further submission making it nice and clear what is being offered. Please ensure you have sent it also to the local authority, so the panel are fully aware.

I'm sorry but this is an application we are still unable to support. We strongly believe it will end up being more wet led then food and likely to cause breaches of licence issues further down the line, for this reason, we do need a licensing panel to make the final decision on it.

We appreciate the work you have done to try and address our concerns.

Kind Regards

Mark.

REP B

From: Sarah Cornell REDACTED

Sent: 19 February 2026 15:42

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

Subject: Representation for Cosies, 10 Dyke Road, Brighton, BN1 3FE - Ref: 2026/00177/LICREP/EH

CH CON END 25.02.2026 VALID PCD and PPN (B)

Dear Corinne Hardcastle

Re: Licensing Act 2003 - Representation regarding the application for a New Application for a Premises Licence For: Cosies, 10 Dyke Road, Brighton, BN1 3FE

I refer to the application made by Cosies (Brighton) Limited, for a new Premises Licence to be issued for the above premises. The Licensing Team, in its role as a Responsible Authority, has concerns about this application and therefore I am submitting this representation on the grounds of the prevention of crime & disorder and public nuisance and to uphold our Statement of Licensing Policy 2026 (SoLP), which came into effect on 5 January 2026.

The applicant has applied for a Premises Licence for alcohol for consumption on & off the premises and recorded music: Tuesday – Friday 14:00 – 23:00 and Saturday - Sunday 12:00 – 23:00 with the same opening hours.

The premises falls within the Special Stress Area (SSA), which the 2026 SoLP expressly retains as a designated area requiring extra scrutiny because of persistent levels of alcohol-related crime, disorder and nuisance. This was confirmed during the 2025 review of the policy, where the Committee agreed to retain the SSA in full.

The SoLP requires that premises within the SSA must provide robust, enhanced best-practice measures to mitigate the well-documented risks in this area (3.3.3 of the policy and Appendix A).

The Council's SoLP includes a Matrix Model approach for licensing decisions, which recognises the diverse operation and different risks presented by different classes of licensed premises. It provides a vision of what the licensing authority would like to see within its area and gives an indication of likelihood of success or otherwise to investors and local businesses making applications.

The Matrix Model, states that in the SSA, Cafés would normally only be granted hours up to 22:00hrs, Food & Dining (Restaurant-type) venues, where alcohol is ancillary to a table meal, are generally more acceptable under the Matrix than alcohol-led premises, but they remain subject to restricted terminal hours and must demonstrate strong operational measures appropriate to the SSA. Off-licences are not supported in this area.

Guidance issued under S182 of the Licensing Act 2003 states that in completing an operating schedule, applicants are expected to have regard to the SoLP for their area. The guidance goes on to say that applicants are expected to include positive proposals

in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, SSA and matrix approach to decision making policies), applicants are also expected to demonstrate an understanding of how the policy impacts on their application, any measures they will take to mitigate the impact, and why they consider the application should be an exception to the policy.

In this case, the operating schedule does not reference the SSA, nor does it acknowledge or respond to the expectations outlined in the newly adopted SoLP. There are a limited number of steps the applicant has added in the operating schedule but there are no positive, detailed and specific proposals in there addressing relevant local risks or why their proposal should be considered an exception to the policy.

I invite the Sub-Committee Panel to decide the outcome of this application on behalf of the Licensing Authority and whether the applicant has demonstrated whether there are exceptional circumstances to depart from our policy.

Yours sincerely

REDACTED

Sarah Cornell

Senior Licensing Officer

Licensing Team

S1

CH CON END 25.02.2026 VALID PCD, PPN and PS. (S1)

12th February 2026

To: The Licensing Department, Brighton & Hove City Council

RE: Support for Premises Licence-COSIES (BRIGHTON) LTD -10 Dyke Road, Brighton, BN1 3FE.

To whom it may concern,

We are writing as the Freeholder of the above mentioned property to support this application. Having owned this property since 2014 and through failed food-led tenancies, I believe the current proposal is the only viable way to ensure the site's long-term safety and commercial success. For example, the immediate previous tenant was in occupation for 5 years (with a 10 year lease) and we tried hard to work with them by giving significant rent arrears concessions over that period but they still could not make their cafe operation viable.

1. Rebutting the Food-Led Constraint

Under the council's 2026 Statement of Licensing Policy, there is a preference for licencing food-led venues in the Special Stress Area (SSA). However, local

economic reality has shown that a "food led" model is not sustainable here albeit as a cafe recently. This is a low capacity unit and a traditional restaurant business would not be viable. It is currently vacant because it was not sustainable on food alone.

We firmly believe that a compact and sophisticated mixed-use, wet-led model with a high-quality food and beverage (tap room concept) offer that differentiates from high volume vertical drinking establishments is necessary for financial stability and to prevent the unit from falling into disrepair.

Furthermore, another recent trend that was not anticipated is changing eating dietary habits that are driving demand for less substantial food (smaller- portions), from an increasing more health and diet conscious consumer base and also more lower /zero alcohol alternative drinks that we understand the venue will be offering. I understand any off sales would be for the premium craft beers offered and these would be brewed locally for people to enjoy in their own homes.

2. Diversity and Public Safety

The 2026 Policy supports a "diversity of premises" to reduce violent crime by attracting a wider age balance. This proposal moves away from a struggling cafe toward a professionally managed venue that will provide "active frontage". Currently, the small external forecourt is frequently occupied by rough sleepers when the unit is closed or vacant, plus creating persistent issues with litter, waste and anti social behaviour. This new business will provide the consistent management needed to keep this area clear and clean and improve the street scene which is much needed.

3. Shadow Licence Commitment

As a committed local landlord, once the premises licence was granted we would apply for a Shadow Premises Licence. This would ensure that we maintain direct oversight of the site. So meaning that should the tenant fail to meet the council's "Good Operator" standards, we will have the immediate legal power to step in, ensuring the licensing objectives are always upheld.

We believe this application promotes the city's vision for a safe, inclusive, and vibrant night-time economy and represents the most sustainable and responsible use of the building.

REDACTED

APPENDIX D

AGREED CONDITIONS WITH ENVIRONMENTAL PROTECTION TEAM

1. No noise or vibration shall emanate from the premises, nor be transmitted through the structure of the building, that gives rise to a nuisance.
2. The licence holder shall ensure that prominent, clear and legible notices are displayed at all exits requesting that patrons respect the needs of local residents and leave the premises and surrounding area quietly.
3. Clear and legible notices shall be prominently displayed at any designated smoking area requesting that customers respect the needs of local residents and use the area quietly.
4. The premises frontage shall be regularly monitored and kept clean and clear of litter.
5. Arrangements shall be put in place to ensure that waste collection contractors do not collect refuse between 19:00 and 07:00 hours.
6. Between 22:00 and 07:00 hours, no waste or glass bottles shall be moved or deposited into receptacles.
7. The outdoor area shall only be used for patrons between 14:00 and 22:00 hours, Tuesdays to Fridays and 12:00 and 22:00 hours, Saturdays and Sundays. There shall be no vertical drinking.

Any outside seating and tables shall be rendered unusable after 22:00 hours and the area shall be cleared of patrons. Smokers shall not be permitted to take drinks outside after 22:00 hours and signage displayed informing customers of this.

8. Doors and windows shall be kept closed while music (other than background music) is being played, except for access and egress.
9. The licence holder shall ensure that people on or leaving the premises conduct themselves in an orderly manner and do not cause annoyance to residents or passers-by.

AGREED CONDITION WITH LOCAL BUSINESS

1. There will be no external speakers outside playing any music to the drinking terrace Monday - Friday any EARLIER than 20.30

Appendix E

