Appendix C

REP A

CH CON ENDS 18.04.2025 VALID PCD & PPN

From: Cllr Sue Shanks

Sent: Friday, March 28, 2025 2:09:14 PM

To: Corinne Hardcastle

Subject: RE: RE: Licence application number :1445/3/2025/01793/LAPREN

My objection is about the prevention of public nuisance and potential for crime and disorder from people drinking at eth establishment

SECENSING / / 2025

ENVIRONMENTAL HEALTH

& LICENSING

RECEIVED 09 104/ 2025 Representation to Licensing Application.

Name & address of premises subject to application. 1445 3 2025 / 01793 / LAPREN DRACULAS HOUSE 58 London Road, BRIGHTON BNI 4 JE Your name & address (residence or business).

The Prevention of Crime & Disorder Condon toad a weady
faces persistent Challenges with street
do de
wurking, aggressive bengin our and other
deinking, aggressite behaviour and other artisaial behaviour.
Public Safety
The Prevention of Public Nuisance - Those is a Well de Grandel
The Prevention of Public Nuisance - There is a well deamented pattern of anti-social behaviour, including late
right noise, littering, graffiti and loitering
The control of the co
near shoppints and bus stops.
I respectfully request that this application
be refused in a cordance with licensing
polity.
The Protection of Children from harm
Signed Date:
Name '

Please note

- 1. Electronically transmitted representations must be confirmed in writing and signed within 5 working days
- Representations are in the public domain. Copies are sent to the applicants to allow discussions and with the notice of hearing. They are also included in Licensing Panel papers. Hearings are public.

REP C

CH CON ENDS 18.04.2025 VALID PPN & PCD

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ENVISORMENTAL HEALTH

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& LICENSING

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RECEIVED 09 1041 2025

Representation to Licensing Application.

Name & address of premises subject to application. 1445/3/2025/01793/ LAPREN DRACULAS HOUSE 58 London Road Brighton BNI 4JE Your name & address (residence or business).

The Prevention of Crime & Disorder Alcond Consumption	
Tinthe lond on Food has increased wick or	
To Att Corical Se harriognes haldes in the Att	
and Vandalism, already cleated	
extreme Stress in Cina on Kond inth Crime	
and Disorder.	
Public Safety	
The Prevention of Public Nuisance our Stock is a hub for Stock drinkers and beggers, persistently	
loitering, Shouting causing public ruisance	
to the residents and people walking on the	
Street under the influence of al condoct. T strongle	ı
Street under the influence of al control of Istrongly object to the new offlicence at 58 lond on Road as it will add more nusance than he already)
will add more nusance than he already	
The Protection of Children from harm	
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20th 1	0 00
Signed: Date: Date	2025
Name:	
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Please note:

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ENVIRONMENTAL HEALTH
& LICENSING
RECEIVED OP 1041 2025

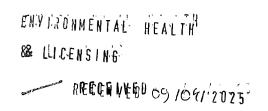
Representation to Licensing Application.

Name & address of premises subject to application.
58, London Road, BNI 4TE
1445/3/2025/01793/ LAPREN
Your name & address (residence or business).

The Prevention of Crime & Disorder	
London rodd is severely affected by street drinking and	
alcohol related antisound behaviour. Reople shout and scream	
under the influence of alcohol distrubing my sleep. It is	
London rodd is severely affected by street drinking and alcohol related antisocial behaviour. People shout and scream under the influence of alcohol disturbing my sleep. It is not as safe as it was when I first moved here 7 ys ago.	
Public Safety	
The Prevention of Public Nuisance	
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Ata bottles on the street especially Sat, Suh moting.	,
when I walk with my you can find broken beer gla bottles on the street especially Sat, Suh moting. I also feel concerned for our safety, as there are people rough sle	eping
The Protection of Children from harm	rear.
Shouting and screaming under influence scared my	
while we walking to around & pon.	
This happens several times. This place has become NOT so family friendly. If this doesn't change I will	
MOT so family friendly. If this doesn't change I will	
have to move comewhere where my	
Signed: Date:	
Name:	

Please note:

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- 2. Representations are in the public domain. Copies are sent to the applicants to allow discussions and with the notice of hearing. They are also included in Licensing Panel papers. Hearings are public.



Formal Representation Objecting to Off-Licence Application

To: The Licensing Officer	[Regulatory	Service morager,
Licensing Team	Regulatory	Services - Environmentes
Licensing ream	J	Healt & Liunsing

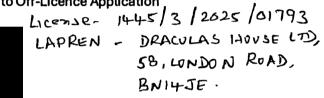
Brighton & Hove City Council

Bartholomew House Bartholomew Square Brighton

BN1 1JP

Date: 24-3-2025

Subject: Formal Representation Objecting to Off-Licence Application



Dear Sir/Madam,

I am writing to submit a formal objection to the off-licence application for premises located at var pease London Road (BN1 4JE) and Elder Place (BN1 4GG). My representation is made under the Licensing Act 2003 and is in direct response to the location of this application within a Cumulative Impact Zone (CIZ) as designated by Brighton & Hove City Council.

As a local resident, I am deeply concerned about the negative effects this application would have on the immediate area, which already suffers from a high concentration of licensed premises and the associated challenges. Granting another licence in this locality would, in my view, undermine the promotion of the four licensing objectives:

. Protection of Children from Harm These streets are home to families and are frequently used by schoolchildren and young people. Additional off-licence availability in this area risks normalising alcohol consumption in public spaces and increasing the exposure of young people to harmful behaviour.

Given that this application falls within a designated stress area, the presumption should be to refuse unless the applicant can clearly demonstrate that the new licence would not add to the cumulative impact already experienced in this neighbourhood. To my knowledge, no such exceptional circumstances have been presented.

this application in the interests of public safety, community well-being, and adherence to For the reasons outlined above, I respectfully urge Brighton & Hove City Council to reject the Licensing Policy.

Please confirm receipt of this representation and advise me of any hearings or further actions in relation to this matter.

Yours faithfully,

ENVIRONMENTAL HEALTH
& LICENSING
RECEIVEDO9 1041 2025

To:

Regulatory Services Manager

Regulatory Services, Environmental Health and Licensing

Bartholomew House

Bartholomew Square

Brighton

BN1 1JP

Date: 20/03/2025

Subject: Formal Representation Objecting to Off-Licence Application - 1445/3/2025/01793/LAPREN - (Draculas House, 58 London Road, BN1 4JE)

Dear Sir/Madam,

I am writing to formally object to the premises licence application submitted by Draculas House Ltd for 58 London Road, Brighton, BN1 4JE, under application reference 1445/3/2025/01793/LAPREN.

This location falls within the designated Cumulative Impact Zone (CIZ), a recognised stress area

under Brighton & Hove City Council's Statement of Licensing Policy due to the high density of

licensed premises and related issues. As a local resident, I have serious concerns that approving

this application will further exacerbate ongoing problems related to:

1. Prevention of Crime and Disorder

The London Road and Elder Place area already faces persistent challenges with street drinking,

aggressive behaviour, and other alcohol-related disturbances. A new off-licence at this address

would likely increase such incidents, placing additional strain on local police and community

services.

2. Prevention of Public Nuisance

There is a well-documented pattern of antisocial behaviour in this area, including late-night noise,

littering, graffiti, and loitering near shopfronts and bus stops. Granting a licence to sell alcohol at this site may worsen these problems and reduce the quality of life for residents and Others.

3. Public Safety

The area around 58 London Road is often used by vulnerable individuals, including those accessing local support services. Increased alcohol availability in this zone raises legitimate concerns about public safety and safeguarding.

4. Protection of Children from Harm

This area is frequented by families, children, and students. It is also close to residential housing and schools. Another licensed premises selling alcohol in the area may expose young people toenvironments where public intoxication and disorderly conduct are common occurance, I respectfully request that this application be refused in accordance with Licensing Policy.

Please confirm receipt of this objection and advise me of any hearings or further steps related to this application.

Yours faithfully,



ENVIRONMENTAL HEALTH
& LICENSING
RECEIVED OF 104 2025

Representation to Licensing Application.

Name & address of premises subject to application.	
house - 1445/3/2025/07793 Dracula House Ltd. 58 London Road	LAPREN
Buchten	
BNIT YE.	
36	
Your name & address (residence or business).	5
	2)
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The Prevention of Crime & Disorder	
Lots of AntiSocial behaviour is	
already happening in this area so	
Lots of AntiSocial behaviour is already happening in this area so preventing any additional behaviours would be in the best infrest of the public	,
Public Safety Without additional persons licenses it will	
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help is to keep up with the safety	
of the public It is already hard	
on London rd.	
The Prevention of Public Nuisance	
Any prevention of additional licensed	
premises will help to prevent,	
additional public nuisance in the	
The Protection of Children from harm	
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London Road is fill of families and having all the anti social behavior	(
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for I healthy uplaninging I strongly obj	ed enisus.
Signed Date: 28.03/25	41/10-
Name	
Please note:	

2. Representations are in the public domain. Copies are sent to the applicants to allow discussions and with the notice of hearing. They are also included in Licensing Panel papers. Hearings are public.

1. Electronically transmitted representations must be confirmed in writing and signed within 5

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& LICENSING
RECEIVEDO9 109 2025

Representation to Licensing Application.

Name & address of premises subject to application.
bience - 1445/3/2028/61793/LAPREN
Draculas House 1td.
Se London Road.
Brighton
B101 4JE
Your name & address (residence or business).

The Prevention of Crime & Disorder
Public Safety
·
The Prevention of Public Nuisance
More people stay till late might because of the
alcohol more noisy cause on the street.
That's pason we object to the off-licence
application as it will add more strain on police which they already have in London Road.
The Protection of Children from harm
20/2/=
Signed: Date: $\frac{29/03/25}{}$
Name: .

Please note:

 Electronically transmitted representations must be confirmed in writing and signed within 5 working days.

2. Representations are in the public domain. Copies are sent to the applicants to allow discussions and with the notice of hearing. They are also included in Licensing Panel papers. Hearings are public.

ENVIRONMENTAL HEALTH

& LICENSING

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Representation to Licensing Application.

Name & address of premises subject to application.
3. Constitu
1445/3/2025/01793/LAPREN -
DRACLILAS HOUSE, 58 London Road
Brighton
BNI 4JE
Your name & address (residence or business).

The Prevention of Crime & Disorder
Public Safety -
-
The Prevention of Public Nuisance I daily face severe challenges with street drinking aggressive behaviour, public violence, rhisance, theat vandalism and littling. A new y-licence at 58 London Road would likely increase such
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behaviour, public prolence, reliedace, theat
and the second s
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58 Condon Road would likely increase such incidents, Placing aditional stain on tozal price and community services. I strongly
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The contract of the contract o
object this application.
The Protection of Children from harm

Signed: Date: ..26/3/2075

Please note:

Name: .

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REP J

CH CON ENDS 18.04.2025 VALID PCD, PPN & PCH

From:
Sent: 07 April 2025 12:18
To: Cllr Sue Shanks
Subject: Objections

Sub: Objections against Licensing Objectives:

Here are the details of objections against the licensing objectives:

1.0 Prevention of Crime and Disorder:

Romanian origin alcohol is also another alcohol.

Grant of licence to Dracula house shop will increase the consumption of alcohol.

More consumption of alcohol will increase the risk of crime and disorder i.e. more crimes and violence, and adding antisocial behaviour in the stress zone.

2.0 Prevention of Public Nuisance:

Romanian alcohol is having higher strength as compared to others. Strong alcohol is even bad for the drinkers health. These drinkers react more violently with aggressive behaviour, vandalisim, loitering shouting, verbal abuse and will result more public nuisance.

3.0 Protect children from harm

The sales are not authorised by personal licence holder or DPS so it will cause more underage children / school children drinking alcohol thus undermining the objective of Protect children from harm .

Other Reasons for objection:

a) Shop location is just outside the bus stop - more opportunities to get alcohol and consume.

b) did not get the off licence in this stress zone so we don't want another licence in this stress area .

Thanks

From: Sent: 11 April 2025 11:45

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

Subject: Re: IMPORTANT - Dracula's House, 58 London Road, Brighton, BN1 4JE -

2025/01793/LAPREN

Dear sir,

Good afternoon

Thanks for the email, I am providing my details as requested:



REP K

CH CON ENDS 18.04.2025 VALID PCD, PPN, PS & PCH

From:

Sent: 12 April 2025 17:40

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

Cc: Cllr Sue Shanks

Cllr Ellen Mcleay

Subject: Draculas House - Licence - 1445/3/2025/01793/LAPREN

Dear EHL licensing,

Licence - 1445/3/2025/01793/LAPREN

58 London Road Brighton

Representation: OBJECT i.e. apply the criteria of SSA

From

BN14JE

mailing address

Grounds:

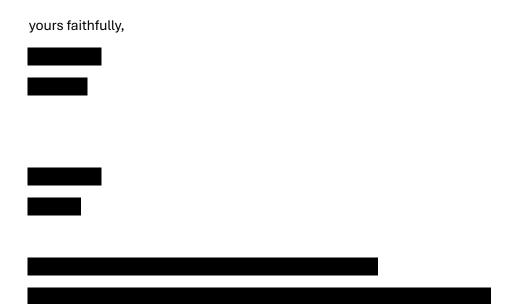
- prevention of crime and disorder
- prevention of public nuisance
- public safety
- protection of children from harm

As described in the statement of licensing policy - revised January 2021, the premises referred to are in the special stress area (SSA). The matrix for this area presumes "No" for an off-licence.

While members of the LAT fully appreciate the value of the off-licence trade as run by reputable established responsible premises, we are also aware of the huge problems (crime and disorder, public nuisance e.g. street drinking, public safety, underage drinking) that have been very prevalent in this area. This, historically, also affects the area of the Level, and Providence Place gardens etc. To this end we have historically advocated impartial application of the SSA criteria by the licensing panel.

We are not aware of any special factors that would indicate a departure from the SSA matrix in this case - at least none are clearly defined in the application. In fact the application is a little misleading in that the premises concerned would not be a "small convenience shop" unless we are missing some information. Obviously the licensing panel would be judging the merits of the application in this case.

Please advise whether this constitues a valid representation.



REP L

CH CON ENDS 18.04.2025 VALID PCD & PPN

From:

Sent: 12 April 2025 22:25

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

Subject: Draculas House - OBJECTION TO OFFLICENCE APPLICATION - 1445/3/2025/01793

Tο

The Regulatory Services Manager, Regulatory Services Environmental Health and Licensing, Barthlomews house Barthlomews square Brighton

Subject: FORMAL REPRESENTATION OBJECTION TO -OFF-LICENCE APPLICATION - 1445/3/2025/01793 LAPREN
DRACULAS HOUSE LTD
58 LONDON ROAD
BRIGHTON
BN1 4JE

Dear Sir,

BN 1 1JP

I am

which is behind London Road. I strongly object this application on the following grounds of licensing objectives :

The prevention of crime and Disorder:

I travel regularly by bus to attend meetings & shopping on London Road after getting down on London Rd.

I walk along the shops and by public stair case to Fleet street. I witness lot of antisocial behaviour around on daily basis (check the police records), drinkers under the high influence of alcohol always swearing, shouting and loitering on London Road smashing the windows -vandalising the public bus stops and stealing.

The prevention of public nuisance:

I see several youngsters sitting outside the bus stop and shops on London Road & on the staircase drinking & begging

On London Road there are three supermarkets & several retail stores already selling alcohols, which has a huge impact on the street drinkers on London Road. I personally think granting off another off licence to above Permise right outside bus stop will have great effect to waiting passengers & increase more public crime and nuisance on the London Road community which is already on severe stress zone.

I strongly object and request the licensing team and the Council not to grant a new offlicence by considering the current conditions of public nuisance & crime on London Rood.

Thanking you



12 April 2025

ENVIRONMENTAL HEALTH
& LICENSING
RECEIVED 14 104/ 2025

Representation to Licensing Application.

Name & address of premises subject to application.
LICENCE - 1445/3/2025/ 01793 LAPREN
DRACULAS HOUSE . Ltd.
58 LONDON ROAD.
BRIGHTON.
BN14JE,
*
Your name & address (residence or business).

The Prevention of Crime & Disorder
1 att cacto
London Road already attracts
we don't need another off
Loranse
Public Safety
The Prevention of Public Nuisance
We live on London Road
and dont need the Kind of
behaviour that their will
behaviou that bar
attract '
The Protection of Children from harm
The Frocedon of Simulation
Signed: 8/4/25
Signed: Date://
Name:

1. Electronically transmitted representations must be confirmed in writing and signed within 5

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Sussex Police Agreed Conditions - Dracula's House, London Road

General

- 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. 80% of the alcohol sold shall be of Romanian origin.
- 3. All alcohol will be displayed behind the serving / till counter as displayed in red on the premises plan.
- 4. No beer, lager, cider or perry with an ABV 6% or above shall be sold at the premises 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.
- 5. Spirits sold in 35cl containers and under are not permitted.
- 6. There will be no external advertising outside of the premises of alcohol.
- 7. All alcohol sold will be in closed containers.
- 8. There will be no delivery service of alcoholic products.

Prevention of crime & disorder

- 9. 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.
- 10. 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 take into account information or guidance offered by the police, and also taking into account busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.
- 11. (a) An incident and refusals log (book or electronic) will be maintained by the premises 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.
- 12. 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.

Additionally, as offered up within the original application and or agreed with another responsible authority.

Public safety

As offered up within the original application and or agreed with another responsible authority.

Prevention of public nuisance

As offered up within the original application and or agreed with another responsible authority.

Protection of children from harm

- 13. 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.
- 14. Signage advertising the "Challenge 25" policy will be displayed in prominent locations in the premises.
- 15. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and serving alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling, serving or delivering of such products and will include:
 - *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.

- * 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.

Additionally, as offered up within the original application and or agreed with another responsible authority.