

Appendix A1

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

Applicant: London Export and Import Ltd

STATION GRILL

Premises: 62 Queens Road, Brighton BN1 3XD

Business Type: Mixed Egyptian and Turkish Cuisine

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

1. Consultation with and Meeting Requirements of Responsible Authorities

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

2. Corporate Social Responsibility (CSR) Policy

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

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

3. Community Contribution to Offset Impact

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

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

4. Community Support

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

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

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

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

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

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

Furthermore:

Prevention of Crime and Disorder

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

7- we will be a member of:

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

8- I am SIA door supervisor:

The policy recognises the use of registered Door Supervisors All Door Supervisors will be licensed by the Security Industry Authority. We will use Mobile security units or similar systems which are in use by some premises operators as a means of providing security cover at very short notice at premises which may not normally require a permanent security presence. This policy endorses the use of units following such guidance and standards in appropriate circumstances.

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

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

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

12- we will be:

- A membership of Business Crime Reduction Partnership, Pubwatch, Neighbourhood Watch or similar schemes
- use of 'Night Safe' radio system or similar accredited scheme
- regular training and reminders for staff in respect of licensing legislation, policies and procedures; records of which should be properly recorded and available for inspection

- systems in place to ensure details of barred clients are exchanged with other operators
- giving an agreed minimum notice of special events (screening of major sports events, birthday parties, adult entertainment, etc.) to relevant authorities and use of appropriate additional measures at such events.

Conclusion

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

Yours sincerely

REDACTED

London Export and Import LTD

28/06/2025

Second statement of exceptional circumstances

Dear sir / madam,

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

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

2- **Exceptional Circumstances Apply**

SoLP states that:

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

Notes on matrix as per SoLP

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

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

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

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

Our premises is:

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

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

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

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

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

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

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

2. Public Safety and Night-Time Economy

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

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

Disparity and Possible Discrimination

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

Human Rights and Fair Treatment

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

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

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

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

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

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

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

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

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

3. We have Taken Reasonable Steps

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

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

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

Regards

Station Grill

REDACTED

05/07/2025

Third statement of exceptional circumstances

Dear sir / madam,

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

According to Statement of Licensing Policy in Brighton and Hove:

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

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

2. Notes on matrix-

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

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

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

1. Consultation with and Meeting Requirements of Responsible Authorities

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

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

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

2. Corporate Social Responsibility (CSR) Policy

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

3. Community Contribution to Offset Impact

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

4. Community Support

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

5. Alcohol Sale Ancillary to Business Activity

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

Conclusion

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

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

Kind Regards

REDACTED

Station Grill

09/07/2025

SIA License Door Supervisor

Dear sir / Madam,

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

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

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

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

Please find attached letter from SIA.

Regards

.& Hello, REDACTED



Security Industry Authority

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Message

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11 July 2025

Subject

Your SIA licence has been granted

Message

REDACTED

Licence Granted

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

Licence Number: **REDACTED**

Role: **Front Line**

Sector: **Door Supervision**

Licence Expiry Date: **10 July 2028**

a key holder:

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

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

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

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

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

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

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

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