

REP A

EF CON ENDS 07.10.2025 VALID PCD & PPN



Regulatory Services
Bartholomew House
Bartholomew Square
Brighton

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

Date: 15 September 2025
Our Ref: ELG/2025/02350/LICREP/EH
Phone: Emma Grant
Licensing Officer [REDACTED]
e-mail: [REDACTED]

Dear Emily

Licensing Act 2003
Hove Post Office, 30 Church Road Hove

I wish to make a representation against a new application for a premises licence for Hove Post Office 30 Church Road Hove. The application is for the sale of alcohol on Monday to Saturday 08:00 to 23:00 and Sunday 09:00 to 19:00 off the 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 (SoLP).

The premises is within the Special Stress Area (SSA) of the city, which can be found in our SoLP from page 15. The SSA is of concern to the Licensing Authority because of the relatively high levels of crime and disorder and nuisance experienced within it and we believe that the granting of this application could lead to increased associated issues with regard to crime & disorder and public nuisance in the nearby surrounding area.

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 there should be no new off licenses in the SSA. The policy does state that each application is still considered on its individual merit and there is discretion to depart from the policy where justified. However, departure from the Matrix Model is only expected in exceptional circumstances.

Guidance issued under S182 of the Licensing Act 2003 states that in completing an operating schedule, applicants are expected to have regard to the statement of licensing policy 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

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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.

Although the applicant has not referred to the SSA in the application, they have proposed conditions to address the licensing objectives, including the provision of CCTV, staff training - in particular relating to underage sales, Challenge 25, dealing with drunk customers, and keeping a refusals register.

The Licensing Team therefore makes this representation to uphold the council's SoLP and we wish to bring the application to the attention of the panel so that they can decide whether this application constitutes exceptional circumstances to depart from the policy.

Yours sincerely,

Emma Grant
Licensing Officer

REP B

EF CON ENDS 07.10.2025 VALID PCD, PPN, PCH, & PPN

From: [REDACTED]

Sent: 25 September 2025 16:31

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

Subject: Premise License Application 1445/3/2025/07599/LAPREN

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Date: 25 September 2025

To:

Licensing Team

Brighton and Hove City Council

Bartholomew House

Bartholomew Square

Brighton

BN1 1JP

Email: [REDACTED]

Subject: Objection to Alcohol Licence Application

T/A Hove Post Office

Address of Premises:

30 Church Road

Hove

BN3 2FN

Application Reference: 1445/3/2025/07599/LAPREN

Dear Licensing Team,

I am writing to formally object to the alcohol licence application submitted by Hove Stores LTD trading as Hove Post Office. I am a local business owner in close proximity to the premises and am deeply concerned about the potential negative impact that granting this licence may have on our community.

My objection is based on all four of the Licensing Objectives under the Licensing Act 2003, which I believe will be compromised if this licence is granted:

1. The Prevention of Crime and Disorder

Introducing alcohol sales at this location risks increasing anti-social behaviour and street drinking in the area. The vicinity already faces challenges with public drunkenness and petty crime, and allowing alcohol sales from this premises may exacerbate these issues, particularly if sales extend into the evening.

There is also concern about the ability of the store to effectively manage age-restricted sales, especially given the busy nature of post office operations, which may divert attention from rigorous ID checks.

2. Public Safety

This premises is located on a busy thoroughfare used by families, children, and the elderly. Increased footfall due to alcohol sales may create safety risks, especially if intoxicated individuals loiter around the store or nearby public spaces.

Furthermore, the store may not be physically suitable or secure enough to manage alcohol sales safely, especially considering its dual function as a post office – which could create confusion and conflict between public service users and alcohol purchasers.

3. The Prevention of Public Nuisance

Allowing alcohol sales may result in increased noise, litter (e.g. cans, bottles), and loitering near the premises. This is particularly concerning during evening hours or weekends, when residents expect a quiet and safe environment.

Given the close proximity of homes, any disruption from alcohol-related nuisance would directly affect quality of life. In a residential setting like this, even small increases in such behaviour can have a significant cumulative impact.

4. The Protection of Children from Harm

The area surrounding the premises includes schools, nurseries, and parks. Children regularly use the nearby shops and streets, and normalising alcohol sales at the local post office – traditionally seen as a safe, community-focused service – sends the wrong message.

Additionally, the presence of alcohol in a setting where children may be queuing or shopping with parents could inadvertently expose them to inappropriate behaviour from intoxicated individuals or influence underage drinking culture in the area.

Conclusion

I respectfully urge the Licensing Committee to refuse this application. The risks posed by selling alcohol from this location – particularly from a business already functioning as a vital community hub – far outweigh any potential benefits. The proposal is fundamentally at odds with the licensing objectives set out by law and does not reflect the needs or wishes of the local community.

Thank you for considering my objection.



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

07/10/2025

Police Station
John Street
Brighton
BN2 0LA

Tel: [REDACTED]
www.sussex.police.uk

Email: brighton.licensing@sussex.police.uk

Dear Emily Fountain,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR HOVE POST OFFICE, 30 CHURCH ROAD, HOVE, EAST SUSSEX, BN3 2FN UNDER THE LICENSING ACT 2003.
1445/3/2025/07599/LAPREN

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the grant of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and public nuisance. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy (revised January 2021) and the Revised Guidance issued under section 182 of the Licensing Act 2003 (February 2025).

This is a proposed new 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 Street Area (SSA) (as defined in the BHCC Statement of Licensing Policy) and seeks the following licensable hours for sale by retail of alcohol off the premises:

Sale by Retail of Alcohol (Off the premises)

Monday - Saturday: 08:00 – 23:00
Sunday: 10:00 – 19:00

Opening Hours:

Monday - Saturday: 08:00 – 23:00
Sunday: 09:00 – 19:00

Paragraph 3.2.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy 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 licensing decision matrix on page 18 of the Council Statement of Licensing Policy (SoLP) suggests that new premises or premises licence variations asking for these licensable activities and hours are a ‘No’. While Paragraph 3.2.3 states that within the SSA “*applications will not be subject to the presumption of refusal*” it goes on to state that “*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*”.

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The applicant did not pre consult with Sussex Police and we do not believe they offer any unique reasons why their application would be an exception to policy or why the SoLP matrix should be departed from. They do not make mention of the BHCC Special Policy or the Statement of Licensing Policy (SoLP) within their application and it is not felt that anything they have provided fully addresses the local concerns or shows that they have paid special attention to their operating schedule.

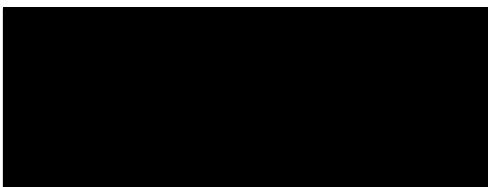
Paragraph 14.40 of the Secretary of State's Guidance to the Licensing Act 2003 (February 2025) provides:

'In publishing a CIA a licensing authority is setting down a strong statement of intent about its approach to considering applications for the grant or variation of premises licences or club premises certificates in the area described....Applications in areas covered by a CIA should therefore give consideration to potential cumulative impact issues when setting out the steps that will be taken to promote the licensing objectives.'

The applicant has offered some information under Section 18 of their application but these are minimal workable conditions and Sussex Police do not believe these go far enough to help mitigate any potential risk in this area of the City. While there is some mention of crime prevention measures such as CCTV, the conditions offered fall short of the current city-wide standard and do not encompass the full range of conditions we would expect. Sussex Police additionally contend that the carrying on of additional licensable activity and the hours applied for at these premises could add to the existing issues in this area.

Although there is no presumption of refusal in this area, it is still for the applicant to make positive proposals (including suitable conditions) to ensure they will not add to the existing issues in an area. We do not believe the applicant has gone far enough to evidence why their application would be an exception to policy or why the SoLP matrix should be departed from. Additionally, and what is offered does not evidence that special attention has been paid when drawing up an operating schedule. Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application in light of the Police concerns, local issues and Local Authority special policy.

Yours sincerely,



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

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

Agreed Conditions Between Environmental Protection and the Applicant

Thanks for your application for a premises licence to sell alcohol off the premises between 08:00 and 23:00 hours, from Monday to Saturday and 10:00 to 19:00 hours on Sunday.

To further support the Prevention of Public Nuisance objective, the Environmental Protection Team proposes the following conditions in addition to the proposals in your application:

- Refuse shall be placed into receptacles outside the premises no later than 22:00 hours and no earlier than 07:00 hours.
- No noise shall emanate from the premises nor vibration be transmitted through the structure of the premises that gives rise to a nuisance.