

Brighton & Hove City Council

Licensing Committee Licensing Act 2003 Functions

Agenda Item 7

Subject: Review of Statement of Licensing Policy 2026 –
Consultation Response Report 2025.

Date of meeting: 6 November 2025

Report of: Director City Operations

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Ward(s) affected: All

For general release

1. Purpose of the report and policy context

- 1.1 The Council, as Licensing Authority, has a statutory duty to review and publish its Statement of Licensing Policy (SoLP) every five years. The current policy took effect on 4th February 2021.. The policy should be kept under review.
- 1.2 The Council, as a licensing authority, must carry out a consultation exercise prior to any review of its Licensing Policy (Section 5(3) of the 2003 Act).
- 1.3 On 24 July 2025 the Licensing Committee authorised officers to go out to statutory consultation to review the council's Statement of Licensing Policy 2021.

2. Recommendations

- 2.1 That Committee agree the revisions to the Statement of Licensing Policy (appendix A) incorporating the main revisions as follow
 - 2.1.1 Replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA). Detailed in 3.1 of the revised Statement of Licensing Policy (SoLP)
 - 2.1.2 Retain the current Special Stress Area (SSA) and other areas. (detailed at 3.3 of the draft SoLP)
 - 2.1.3 A focus on safety as the central priority and introduction of a new set of best practice measures for the CSA and SSA which can be found in the revised Statement of Licensing Policy (SoLP) Appendix A.

- 2.1.4 Update the current Matrix approach and table to include new categories of premises including Grassroots Music Venues and changes to the hours for some types of premises which can be found at 3.4 in the revised Statement of Licensing Policy (SoLP)
- 2.1.5 Introduce a 'Good Operator Policy' which can be found at 3.5 in the revised Statement of Licensing Policy
- 2.1.6 Update nighttime economy safeguarding initiatives see section 4 of the policy. Add to the policy sections on LGBTQ+ venues and inclusivity at 1.9. Violence Against Women and Girls (VAWG), at 4.1 Modern Slavery at 1.12 and Martyn's Law at 7.1.5.
- 2.2 That the revised Statement of Licensing Policy is referred to Full Council for adoption. See Appendix A for a copy of the revised statement of licensing policy.

3. Context and background information

- 3.1 Consultation commenced on 8th August 2025 and closed on the 12th October 2025. The consultation included background information and relevant documents to the specific questions on the areas listed in the recommendations (see section 2.1) as well as a copy of the revised statement of Licensing Policy. A copy of the (Your Voice) consultation can be found in Appendix B.
- 3.2 National Guidance states at 13.4 that before determining its policy, the licensing authority must consult the persons listed in section 5(3) of the 2003 Act. These are:
 - The chief officer of police for the area
 - The fire and rescue authority for the area
 - The local authority's Director of Public Health in England
 - Persons/bodies representative of local premises licence holders
 - Persons/bodies representative of local club premises certificate holders
 - Persons/bodies representative of local personal licence holders; and
 - Persons/bodies representative of businesses and residents in its area.
- 3.3 Consultation has been undertaken with these statutory consultees and more generally via the council's on-line consultation platform Your Voice, Licensing website, the city LATs (Local Action Teams), residents associations and community associations, Business Improvement District (BID), Business Crime Reduction Partnership (BCRP), Brighton & Hove Growth Board, other Council services including Tourism, Events Office, Seafront Office (including Seafront Trader Association), Trading Standards, Legal and Finance.

4. Consultation Responses

- 4.1 It should be noted that extensive pre-consultation was carried out with relevant key stakeholders prior to going out to consultation, including Public Health, Police, Environmental Health, Highways, Culture and Environment and Licensing Committee Members. This included a Licensing Summit held on the 10th January 2025 and an informal consultation on Your Voice between the 20th January and 23rd February 2025.
- 4.2 A summary of the responses to the formal consultation are detailed below. A detailed breakdown of the on-line Your Voice consultation responses, together with the additional responses submitted by email can be found in Appendix C
- 4.3 The on-line Your Voice consultation contained specific questions relating to the proposed changes together with a question or comments on a specific area of the policy. As well the option to comment on any aspect of the policy.
- 4.4 With regard to comments on the specific questions relating to the areas of recommendation in 2.1, the comments are summarised below, but it is important that the consultation responses are considered in their entirety (please see Appendix C).

- Replace the current Cumulative Impact Zone (CIZ) with a City Safety Area (CSA)

Headline Results: Support total 54.3% Neither support nor oppose 17.1% Opposed total 22.9%.

- A focus on safety as the central priority and introduction of new set of best practice measures for the CSA and SSA.

Headline Results for Safety First Door Policy: Support total 81.5% Neither support nor oppose No answer, Don't Known 17.1% Opposed total 1.4%.

- Update the current Matrix approach and table to include new categories of premises including Grassroots Music Venues and changes to the hours for some types of premises.

Headline Results for grassroots music matrix category: Support total 60.1% Neither support nor oppose 11.4% Opposed total 22.8%. No answer 5.7%

- Introduce a 'Good Operator Policy'.

Headline Results: Support total 62.9% Neither support nor oppose 8.6%
Opposed total 25.7%. No answer 2.8%

- Updates to the nighttime economy safeguarding initiatives and the additional sections on LGBTQ+ venues and inclusivity, Violence Against Women and Girls (VAWG), Modern Slavery and Martyn's Law

Headline Results promoting equality, diversity, and inclusion: Important 74.3% No answer 7.3% Not sure 4.3% Not important 14.1%.

- In addition to the on-line Your Voice consultation we received four emails they were from a resident, an ex councillor, Hove Civic Society and a representative of the freeholder of Churchill Square these can also be found in Appendix C.

If members were minded to agree the statement of licensing policy, Full Council alone can exercise the function of revising the authority's policy.

5 Financial & Other Implications:

5.1 Financial Implications:

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 by government. There are no revisions proposed in these recommendations to the level of fees, nor restrictions on who the licenses can be issued to. Therefore, there will not be any budgetary adjustments made in respect of this decision.

Finance Officer Consulted: David Wilder Date: 27/10/2025

6 Legal Implications:

These are set out in the report. The SoLP should follow the fundamental principles set out in the Licensing Act 2003 and statutory guidance. Following the consultation exercise, the views of all those persons or bodies should be given appropriate weight when determining the policy.

Lawyer Consulted: Rebecca Sidell Date: 27.10.25

7. Equalities implications

- 7.1 An Equality Impact Assessment (EIA) has been completed as part of the policy review process to assess if there is any adverse impact on a particular group. See Appendix D for the EIA

8. Sustainability implications

- 8.1 Licensed premises throughout the city rely on local licensing policies in ensuring there is clear guidance on the continued operation of local businesses. Maintaining a regularly reviewed policy, which has undergone public consultation, will ensure a consistency of support to licensed

premises, members of the public and other stakeholders affected by these activities.

9. Crime & disorder implications:

- 9.1 CSA proposals are geographically based around evidence of crime and disorder, etc. and should assist in the council's overall aim in reducing current levels. Special Policies promote the four licensing objectives: public safety, the prevention of crime and disorder, the prevention of public nuisance and the protection of children from harm.

10. Public health implications:

- 10.1 Public Health have been consulted as a part of this review and have produced a public health framework for assessing alcohol which can be assessed here [Public Health Framework for Assessing Alcohol Licensing | Tableau](#)

Supporting Documentation

Appendices:

Appendix A – Revised Statement of Licensing Policy

Appendix B – Consultation questions

Appendix C – Consultation responses

Appendix D - Equality Impact Assessment (EIA)

