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**Regulatory Services**

Bartholomew House  
Bartholomew Square  
Brighton  
BN1 1JP

**Corinne Hardcastle  
Licensing Officer  
Licensing Team  
Brighton & Hove City Council  
Bartholomew House  
Bartholomew Square  
Brighton, BN1 1JP**

Date: 6<sup>th</sup> November 2025  
Our Ref: 2025/02624/LICREP/EH  
Phone: [REDACTED]  
Email: [REDACTED]

Dear Mrs Hardcastle

**Re: Licensing Act 2003 - Representation regarding the application for a Variation of a Premises Licence For: Presuming Ed Coffee House, 114 - 115 London Road, Brighton**

I refer to the application made by Prez Ed Ltd, for a variation of the Premises Licence at Presuming Ed Coffee House. The proposal is to licence the first floor and extend the current terminal hours for all licensable activities from midnight until 1am every day as per the below:

Performance of Dance, Performance of Recorded Music, Exhibition of a Film, Performance of a Play, Anything of a similar description to live music, recorded music and performance of dance, Late Night Refreshment, Performance of Live Music and Sale by Retail of Alcohol On 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 and Disorder and the Prevention of Public Nuisance. This premises is also situated on London Road, which sits within the Licensing Authority's Special Stress Area (SSA).

As stated in the Council's Statement of Licensing Policy (SoLP), the SSA is deemed an area of special concern in terms of the levels of crime and disorder and nuisance experienced within it. Our SoLP states that new and variation applications for premises within the SSA will not be subject to the presumption of refusal, but 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.

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 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.

On looking at the application form and background information, the applicant has proposed some additional measures to promote the licensing objectives including updating conditions and proposing new conditions. It is up to the panel to decide if they feel that these measures constitute exceptional circumstances to depart from our policy.

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.

In light of the fact that this new premises falls within our Special Stress Area, 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



Sarah Cornell  
Senior Licensing Officer  
Licensing Team  
Regulatory Services



Police Station  
John Street  
Brighton  
BN2 0LA

[www.sussex.police.uk](http://www.sussex.police.uk)

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

10/11/2025

Email: [brighton.licensing@sussex.police.uk](mailto:brighton.licensing@sussex.police.uk)

Dear Corinne Hardcastle,

**RE: APPLICATION FOR A VARIATION OF THE PREMISES LICENCE FOR PRESUMING ED'S COFFEE HOUSE, 114-115 LONDON ROAD, BRIGHTON, EAST SUSSEX, BN1 4JG UNDER THE LICENSING ACT 2003. 1445/3/2025/08391/LAPREV**

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, public safety 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 variation 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 to amend hours for licensable activity as well as to remove or amend the conditions that were placed on the licence by a Licensing Panel at a Hearing on 20<sup>th</sup> July 2016.

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"*.

The applicant did pre consult with Sussex Police but due to the fact that this premises licence was originally heard by a Licensing Panel to determine the exceptional circumstances and conditions, it is felt that this is appropriate again in the light of the changes that are being applied for. While the applicant has included a large amount of extra information and additional conditions within their paperwork, due to the premises location within the City, Sussex Police do not believe that this goes far enough to help mitigate the potential risk. The local concerns and issues that the area of London Road and the Level attracts, particularly in the warmer months, remain. Questions have been asked

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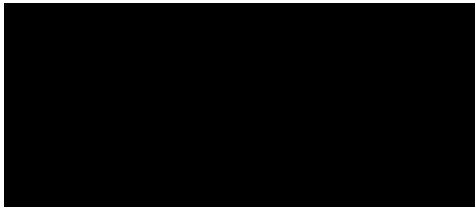
around how the operator will manage SIA security numbers and a change of business style from café bar to more performance based, as well as areas of vertical drinking, but it is believed these need to be explored further.

Additionally, this premises lies within West Hill & North Laine Ward which, as evidenced by the Brighton & Hove Public Health Framework for Assessing Alcohol Licensing (accessed at <https://public.tableau.com/app/profile/brightonhovepublichealthintelligence/viz/PublicHealthFrameworkforAssessingAlcoholLicensing/NavigationPage>), is ranked number 1 for All violence against the person, Non-injury assault and Criminal Damage in 2024/25. This ward is also ranked number 2 for Violence with injury and number 3 for Sexual offences. This demonstrates the higher risk to the Licensing Objective of the Prevention of Crime and Disorder in this area.

The application is consequently at risk of undermining the prevention of crime & disorder, prevention of public nuisance and public safety Licensing Objectives. Furthermore, Sussex Police contend that the carrying on of additional licensable activity by amending the licence to extend hours as well as to remove certain restrictions to on sales/vertical drinking, previously defined at a Licensing hearing, could add to the existing negative cumulative effect in an area already saturated with licensed premises. 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 welcome a presentation from the applicant and the opportunity to ask questions in a public hearing.

For the above reasons Sussex Police invite the Licensing Authority to seriously consider refusing this application.

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.*