

Appendix C

REP A

From: Cllr Sue Shanks <Sue.Shanks@brighton-hove.gov.uk>

Sent: 13 October 2025 10:17

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

Subject: RE: RESTRICTED - Weekly licensing list for the week ending 10.10.2025

EG CON ENDS 07.11.2025 VALID PPN & PS (A)

I am objecting to the alcohol license including off sales for Shine. This area of town already has many off licenses and is in a special stress area. I think it is possible this will add to the public nuisance in the area so I am objecting on these grounds. I also think it is an inappropriate environment for staff and customers so I also object on public safety grounds

The Prevention of Public Nuisance

Public Safety (relating to the premises)

REP B

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

07/11/2025

Email: brighton.licensing@sussex.police.uk

EG CON ENDS 07.11.2025 VALID PCD and CIZ (A)

Dear Emma Grant,

**RE: APPLICATION FOR A NEW PREMISES LICENCE FOR SHINE, 111
GLOUCESTER ROAD, BRIGHTON, BN1 4AF UNDER THE LICENSING ACT
2003. 1445/3/2025/08337/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. 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 Cumulative Impact Area (CIA) (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 (On and Off the premises)

Tuesday - Thursday: 10:00 – 20:00
Friday - Saturday: 10:00 – 18:30

Paragraph 3.1.2 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

“Special Policy - Cumulative Impact is defined as the potential impact upon the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.”

And further

Paragraph 3.1.3 of the Brighton and Hove City Council 2021 Statement of Licensing Policy states:

“The licensing authority, after careful consideration, has determined that the concentration of licensed premises in an area of the city centre is causing problems

of crime and disorder and public nuisance, and that therefore an approach to 'Cumulative Impact' is necessary as part of its statement of licensing policy."

When considering an application, we refer to the matrix within the Statement of Licensing Policy which sets out the expectations for new and varied applications for the City.

Cumulative Impact Zone

Restaurant Yes (midnight) / **Cafe** Yes (10.00pm) / **Pub** No / **Off-licence** No / **Late Night Takeaways** No

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 or fully addresses the local concerns.

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 or offer any protection for any sale of alcohol in this location including off sales purchases. Sussex Police additionally contend that the carrying on of additional licensable activity and therefore the greater availability of alcohol in this area could add to the existing issues in this area.

Recent incident & crime statistics indicate that during the period of 31st October 2024 and 31st October 2025 there were 280 crimes linked to Gloucester Road and surrounding side roads. The majority of these incidents were recorded as violence against the person (93), 74 thefts, 32 were public order crimes, and 10 Sexual offences among other recorded crimes. Additional to this there were 93 reports of Anti-social behaviour along Gloucester Road. Sussex Police would also like to highlight that 149 of these crimes have occurred between 11:00 – 20:00 varying across every day of the week.

Sussex Police has communicated with the applicant and offered a full proposal which was limited to on sales only and a number of conditions. Unfortunately, this has not been agreed too, and the applicant wishes to proceed with off sales.

It is for the applicant to demonstrate they will have no negative impact on the surrounding area. If they are unable to do this then the application should be refused as per the local policy guidance. Currently, we do not believe the applicant has gone far enough to evidence why their application would be an exception to policy or how it mitigates the risk for off sales. Therefore, Sussex Police invite the Licensing

Authority to seriously consider this application and in light of the Police concerns, local issues and Local Authority special policy we ask that should the panel be minded granting this application that it is granted with on sales only and with the full proposed conditions (please find attached).

Yours sincerely,

REDACTED

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.

Proposal for Shine, 111 Gloucester Road, Brighton, BN1 4AF

Remove the off sales aspect

General:

1. 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. There will be no external advertising outside of the premises of alcohol.
3. Alcohol offerings are limited to wines including sparkling wines such as champagne, cava and prosecco.
4. The supply of alcohol shall only be provided to persons as an ancillary to their purchased hair treatment.

For the Prevention of Crime and Disorder:

5. (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 entrance to the premises. 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) Subject to Data Protection guidance and legislation, 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 Sussex Police) for the police without difficulty or delay and without charge to Sussex Police.

(g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable.

(h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Sussex 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.

6. An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. The log will be inspected and signed off by the DPS (or a person with delegated authority) at intervals not to exceed 8 weeks. The log book should be kept on the premises and be available for inspection at all times the premises are open by authorised officers and staff of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence. Any refusals made for alcohol service e.g. underage, will also be recorded (either in electronic or written form) and feedback given to staff as relevant. The log will be kept for a minimum of twenty four (24) months.

Public Safety: None

For the Prevention of Public Nuisance: None

For the Protection of Children from Harm:

7. 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, driving licenses with a photograph, photographic military ID 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 and the Licensing Authority without the need to amend the licence or conditions attaching to it.

8. Signage advertising the “Challenge 25” policy will be displayed in prominent locations in the premises.

9. (a) The Premises Licence Holder shall ensure that all staff members engaged or to be engaged, in selling alcohol at the premises shall receive the following induction training. This training will take place prior to the selling of such products:

- The lawful selling of age restricted products
- 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 and retained for a minimum of twenty four (24) months. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

**Mrs E Grant
Licensing Officer
Licensing Team, BHCC
Bartholomew House
Bartholomew Square
Brighton
BN11JP**

**Date: 7th November 2025
Our Ref: 2025/08337/LAPREN
Phone: REDACTED
Email: REDACTED**

EG CON ENDS 07.11.2025 VALID PCD, PPN and CIZ (B)

Dear Mrs Grant,

Licensing Act 2003

RE: Representation in regard to the application for a new Premises Licence (Ref. 2025/08337/LAPREN)

For: SHINE, 111 GLOUCESTER ROAD, BRIGHTON, BN1 4AF

I write to make a representation on behalf of the Council's Licensing Team, in their capacity as a Responsible Authority, in relation to the above application for a new Premises Licence for Shine by Jonathan Harries.

The applicant is applying for sale of alcohol, on and off the premises and opening hours:-

Tuesday:	10:00 – 18:30
Wednesday - Thursday:	10:00 – 20:00
Friday:	10:00 – 18:30
Saturday:	10:00 – 18:00

I have concerns about this application and make a representation on the grounds of the Prevention of Crime and Disorder and Prevention of Public Nuisance and that this application is contrary to our Statement of Licensing Policy (SoLP).

The council has a special policy to address cumulative impact, the special policy was set up because the Licensing Authority determined that the concentration of licensed premises and the subsequent numbers of people drawn into the city centre is causing exceptional problems of crime and disorder and public nuisance. The special policy will only be overridden in exceptional circumstances. New applications and variations to existing licences should normally be refused following relevant representations. This presumption of refusal can be rebutted by the applicant if they can show that their application will have no negative cumulative impact on licensing objectives including the prevention of crime and disorder and public nuisance. 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.

I note that the premises will operate as a premier hair salon with the extra offering of clients or members of the 'Shine Wine Club' to buy bottles of wine to take off the premises and to buy a glass of wine whilst having their treatment in the salon.

The Council's SoLP includes a Matrix approach for licensing decisions with provisions for a terminal hour for all classes of licensed premises in a particular area. The Matrix Model 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 regard to the Matrix policy, an 'Off licence' is a 'No' within the CIZ. The Matrix policy can be departed from where exceptional circumstances are demonstrated and the applicant has sent in additional information to address this.

I make this representation to uphold our Statement of Licensing policy. The Policy is predicated on too much alcohol being available and applications for new premises licences will be refused unless the applicant can demonstrate exceptional circumstances. It is up to the applicant to demonstrate this and satisfy a Licensing Panel that they will not impact negatively on the CIZ. The Licensing Authority have no objection to the on sales of alcohol with certain conditions attached but have concerns about the off sales.

In light of the fact that this new premises falls within our CIZ and is offering off sales of alcohol, 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,

REDACTED

Sarah Cornell
Senior Licensing Officer
Licensing Team, Safer Communities