

APPENDIX D

RESPONSE TO REP A

From: isteph Ayoub REDACTED

Sent: 30 January 2026 15:31

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

Subject: RESPOND TO REPRESENTATION- The Dials Convenience Store, 157 Dyke Road, Brighton, BN3 1TJ

Dear REDACTED

I hope this email finds you and your family well.

Please find attached a letter addressing the concerns you raised. I have carefully considered each point and have sought to respond in a clear, respectful, and constructive manner. I hope the information provided offers reassurance and clarity.

Should you wish to discuss any aspect further or require additional information, please do not hesitate to contact me. I would be more than happy to assist.

Kind regards,
Isteph Ayoub

Response to Representation – Premises Licence Application

Applicant: Isteph Ayoub

Premises: 157 Dyke Road, BN3 1TJ

Contact Number: REDACTED

Dear REDACTED

I write this response in respect of the representation you submitted in relation to my application for a new premises licence. I do so respectfully and with full regard to the Licensing Act 2003 objectives.

First and foremost, I wish to make clear that my application is modest, tightly controlled, and significantly more restricted than the existing alcohol provision you operate on the same road. My application is limited strictly to the sale of alcohol between **08:00 and 23:00**. In contrast, your premises currently benefits from a **24-hour alcohol licence**. It is therefore difficult to reconcile concerns regarding late-night disorder and pressure on police or council resources with the fact that your business continues to sell alcohol throughout the night, when such risks are widely acknowledged to be greatest.

A further key distinction between our respective operating models is the **strength and format of alcohol sold**. Your premises stocks and sells a very large range of **high-strength beers and ciders**, including products at significantly higher ABV levels, many of which are sold **as single units**. By contrast, as part of proactive engagement with the Licensing Authority, I have **formally agreed** that my premises will:

- Not sell high-strength beers or ciders
- Sell alcohol **only in multipacks of four or more**
- Operate strict refusals and a Challenge 25 policy

These measures are specifically designed to discourage street drinking, reduce impulsive consumption, and protect vulnerable individuals. On this basis, I firmly maintain that my premises is highly unlikely to contribute to the issues described in your representation, and that my operating model is substantially lower risk.

You have placed significant reliance on the number of existing licensed premises in the vicinity, including Co-operative stores. I respectfully submit that the mere presence of other licensed premises is not, in law, a determinative factor and does not of itself justify refusal. The Licensing Act 2003 requires that each application be assessed on its own merits, with reference to evidence that the grant of a licence would undermine the licensing objectives.

It is also relevant that large national operators such as the Co-operative Group operate under highly standardised and tightly regulated models, with strict refusals policies, controlled product ranges, and robust compliance systems. Their presence does not automatically give rise to cumulative impact, nor has evidence been presented to demonstrate that these premises are a source of the issues described.

My proposed operation is demonstrably more restrictive than a typical off-licence. Alcohol sales are limited to 08:00–23:00, high-strength alcohol will not be stocked, and alcohol will be sold only in multipacks of four or more. These conditions materially reduce the risk of street drinking, impulsive consumption, and associated nuisance. On this basis, I respectfully submit that my application does not add to cumulative impact and is fully aligned with the licensing objectives.

You have also raised the issue of cumulative impact by reference to my operation of another premises nearby. I would like to clarify that the business is run jointly by myself and my brother. I am 24 years old and my brother is 26. We have operated our existing shop for over **five years** without a single review, warning, or enforcement issue. Despite starting the business at a young age, we have consistently demonstrated maturity, responsibility, and full compliance with licensing conditions and council guidance.

We are now at a stage in our lives where we wish to progress personally and professionally. Our intention in applying for a second premises is not to increase risk, but to allow each of us to operate a business independently so that we can build stable futures, get married, and establish our own households. This is a legitimate and reasonable progression for two young business owners who have already proven their ability to operate responsibly within the licensing framework.

Finally, I wish to emphasise that competition itself is not a licensing consideration, and my application should be judged on its own merits. I respectfully submit that my operating schedule, reduced hours, refusal to sell high-strength or single alcohol products, and strong compliance record all demonstrate that granting this licence would not undermine the licensing objectives of crime prevention, public safety, or public nuisance.

I remain fully committed to working constructively with the Licensing Authority, Sussex Police, and Environmental Health, and I would welcome the opportunity to address the Licensing Sub-Committee should this application proceed to a hearing.

Yours sincerely,
Isteph Ayoub
Applicant
REDACTED

RESPONSE TO REP B

From: isteph Ayoub REDACTED

Sent: 02 February 2026 16:36

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

Subject: RESPONSE TO THE OBJECTION

Dear REDACTED

I hope you are well.

Thank you for taking the time to share your concerns regarding my premises licence application. Please find attached a letter that responds to the points you raised and outlines the measures and conditions in place to ensure the premises operates responsibly and in a way that protects the local community.

If you have any questions or would like to discuss this further, please do not hesitate to get in touch.

Kind regards,

Isteph Ayoub
REDACTED

**Response to Your Objection – The Dials Convenience Store
157 Dyke Road, Hove, BN3 1TJ**

Dear REDACTED

Thank you for your written objection and for taking the time to outline your concerns regarding my application for a premises licence at The Dials Convenience Store. I recognise that Seven Dials is a busy area with a high residential density, and I understand why residents are understandably cautious about any new premises selling alcohol. I would therefore like to respond directly to the points you raised and explain how the operation of this premises has been carefully designed to address those concerns.

First, in relation to cumulative impact and the concern that the area is already well served by alcohol retailers, it is important to clarify how this premises will operate. The licence sought permits the sale of alcohol only between 08:00 and 23:00. This is not a late-night or 24-hour operation, and it is significantly more restricted than some existing nearby premises. The intention is not to create a destination for alcohol consumption, but to operate a local convenience store serving nearby residents within clearly defined hours.

I have also agreed a robust and enforceable set of conditions with Sussex Police and the Licensing Authority specifically aimed at reducing the risk of street drinking and anti-social behaviour. These include restrictions on high-strength alcohol products, with no beer, lager, cider or perry above 6 percent ABV being sold other than genuine premium or craft products. In addition, standard beers and ciders may only be sold in multipacks of four or more, and single-can sales are prohibited. These measures are widely recognised as effective in discouraging immediate consumption in the street, and consequently will diminish the possibilities of littering and loitering.

Further safeguards are in place in relation to crime and disorder. Alcohol promotions or deals will not be advertised in a way that is visible from outside the premises, and all spirits will be kept behind the counter and out of customers' reach. There will be no delivery of alcohol products from the premises, ensuring that all sales are face-to-face and fully supervised. A comprehensive digital CCTV system to police standards will operate at all times the premises is open, with footage retained for a minimum of 31 days and made available to police upon request.

In addition, an incident and refusals log will be maintained and regularly reviewed, and the premises will participate in a local crime reduction partnership. Sussex Police licensing officers also have the right of access to the premises during operating hours to inspect records and ensure compliance with the agreed conditions. These measures provide ongoing oversight and accountability, rather than relying on goodwill alone.

I also understand your concerns regarding public nuisance, including noise, litter and loitering. Conditions are in place requiring customers to be reminded to leave quietly and respect neighbours, and deliveries, recycling and waste collection are restricted to daytime hours only. No noise or vibration may emanate from the premises in a way that causes nuisance. Staff will be instructed to actively monitor the immediate frontage of the store and to discourage loitering or disruptive behaviour, with service refused where appropriate and incidents recorded.

Finally, the protection of children from harm is taken extremely seriously. The premises will operate a strict Challenge 25 policy, supported by prominent signage. All staff engaged in the sale of alcohol must receive documented induction training before being allowed to sell alcohol, with regular refresher training thereafter. These training records must be made available to the authorities on request.

I appreciate that objections such as yours are raised out of concern for the local community. My intention is to operate a responsible, well-managed convenience store that complies fully with the licensing objectives and respects those who live nearby. I hope this response clarifies how the agreed conditions directly address the issues you have raised.

Yours sincerely,

Isteph Ayoub
Applicant
The Dials Convenience Store

RESPONSE TO REP C

From: isteph Ayoub REDACTED

Sent: 03 February 2026 23:46

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

Subject: RESPONSE TO REPRESENTATION- The Dials Convenience Store, 157 Dyke Road, Brighton, BN3 1TJ

Dear REDACTED

I hope you are well.

Please find attached my response addressing the concerns raised in your representation regarding the premises licence application at 157 Dyke Road.

If you have any questions, please do not hesitate to get in touch.

Kind regards,
Isteph Ayoub

Response to Representation – Premises Licence Application 157 Dyke Road, BN3 1TJ

Dear REDACTED

Thank you for taking the time to submit your representation regarding my application for a premises licence at 157 Dyke Road. I appreciate you sharing your concerns as a local resident, and I would like to respond to them directly.

I understand your concern about the number of premises in the area that are licensed to sell alcohol. However, I would like to respectfully clarify that the presence of other off-licences or convenience stores nearby is not, in itself, a valid reason for refusing a premises licence. Under the Licensing Act 2003, applications are assessed solely on how they promote the four licensing objectives, rather than on issues of market saturation or competition between businesses.

In relation to your concerns about potential anti-social behaviour, I would like to reassure you that I have worked closely with the Licensing Authority and Sussex Police to agree a clear and enforceable set of conditions for the premises. These include restricted hours for alcohol sales, the installation and ongoing use of CCTV, a strict Challenge 25 age-verification policy, comprehensive staff training, and the maintenance of refusal and incident logs. Alcohol will not be sold as single high-strength cans or bottles, and all sales will be managed responsibly to reduce the risk of street drinking.

The premises will operate as a professionally managed local convenience store and not as a late-night or high-risk alcohol outlet. The agreed hours are more limited than those of some nearby premises, and the way the store will be run has been specifically designed to support the local community. These measures will help to prevent nuisance and anti-social behaviour and, consequently, will diminish the possibilities of littering and loitering.

I hope this response reassures you that careful thought has been given to how the premises will operate and how the local area will be protected. I remain committed to running the business responsibly and to working positively with the council and local residents.

Yours sincerely,

Isteph Ayoub
Applicant

RESPONSE TO REP D

From: isteph Ayoub REDACTED

Sent: 15 February 2026 14:37

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

Subject: Response to the Rep of 157 DYKE ROAD

Dear REDACTED

Please find attached my letter responding to the concerns you have raised in relation to the new premises application.

I trust this clarifies the safeguards and measures that will be in place. Should you require any further information, I would be pleased to discuss this with you.

Kind regards,
Isteph Ayoub
REDACTED

Dear REDACTED

Thank you for your representation in relation to my application for a premises licence at The Dials, 157 Dyke Road, BN3 1TJ. I am grateful for the opportunity to respond directly and to clarify how the operation of the premises has been specifically structured to promote and uphold the licensing objectives under the Licensing Act 2003 and in accordance with the Brighton & Hove City Council Statement of Licensing Policy and the statutory guidance issued under Section 182.

I wish to confirm at the outset that the premises is not intended to operate as an alcohol-led business. Alcohol sales will form part of a wider convenience retail offer and will be subject to robust safeguards that have been agreed with Sussex Police, Environmental Health, and the Licensing Authority. These conditions are proportionate, enforceable, and tailored to the local area.

Protection of Children from Harm

I fully recognise that the protection of children from harm includes moral, psychological, and physical harm. I have carefully considered the proximity of schools and routes used by children. To address this:

- A strict Challenge 25 policy will operate at all times.
- All staff will receive documented training in age verification and proxy purchasing prevention.
- A refusals log and incident log will be maintained and made available for inspection.
- Comprehensive CCTV coverage will be in place.
- There will be no external advertising or window displays promoting alcohol.

Importantly, spirits will be stored behind the counter and not accessible for self-selection. This measure provides an additional layer of control and supervision over higher-strength products and significantly reduces the risk of underage access or impulsive purchasing.

Prevention of Crime and Disorder

The operating schedule has been designed to ensure that the premises does not contribute to crime, disorder, or anti-social behaviour. There will be no consumption of alcohol on the premises. High-strength beers and ciders will not be sold. Alcohol will be sold only in multipacks, with no single-can sales, specifically to discourage street drinking and associated disorder.

The hours applied for are modest and do not extend into late-night trading periods commonly associated with increased alcohol-related harm. The premises will operate responsibly, with clear management oversight, CCTV monitoring, and full cooperation with responsible authorities.

Prevention of Public Nuisance

I am mindful of the need to ensure that the operation does not give rise to public nuisance. The premises will be managed to prevent loitering and ensure customers disperse quietly. The absence of single-can sales, high-strength alcohol, and on-site consumption materially reduces the likelihood of nuisance occurring. The frontage will be monitored and managed to maintain a tidy and orderly environment.

Density of Premises and Individual Merits

While I understand concerns relating to outlet density, licensing law requires each application to be determined on its individual merits. This application includes a comprehensive and carefully considered set of conditions that distinguish it from other premises operating with longer hours or higher-risk product ranges.

Conclusion

I respectfully submit that the agreed conditions and operating measures directly promote the licensing objectives and reflect the expectations of Brighton & Hove City Council's policy framework. My intention is to operate a responsible, community-focused business that works positively with residents and responsible authorities.

In light of the safeguards outlined above, I respectfully invite you to reconsider your representation. I remain open to further dialogue should you wish to discuss any aspect of the application in more detail.

Yours sincerely,

Isteph Ayoub
REDACTED

RESPONSE TO REP E

From: isteph Ayoub REDACTED

Sent: 15 February 2026 15:17

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

Subject: Response to the Rep Of 157 DYKE ROAD

Dear REDACTED

Please find attached my response addressing the concerns you raised regarding the new premises.

I hope this provides reassurance as to how the licensing objectives will be upheld. If you would like to discuss any aspect further, please do not hesitate to contact me.

Kind regards,
Isteph Ayoub

Dear REDACTED

Thank you for your representation in relation to my premises licence application for The Dials Convenience Store, 157 Dyke Road, BN3 1TJ. I genuinely appreciate you taking the time to express your concerns as a local resident.

I would like to respond directly and transparently to the points you have raised. The operation of the premises has been carefully structured to promote the licensing objectives under the Licensing Act 2003, particularly the prevention of crime and disorder, the prevention of public nuisance, and the protection of children from harm.

Prevention of Crime and Disorder

I fully acknowledge that there are existing concerns in the wider area relating to anti-social behaviour, shoplifting and street drinking. However, licensing decisions must be based on evidence relating to the specific premises and the conditions attached to it.

This application includes robust and enforceable conditions agreed with Sussex Police, Environmental Health and the Licensing Authority, including:

- A comprehensive CCTV system covering internal and external areas, with recordings retained and made available upon request.
- Maintenance of refusals and incident logs.
- A strict Challenge 25 policy with documented staff training in age verification, proxy purchasing prevention and conflict management.
- No sale of high-strength beers or ciders.
- No single-can sales – alcohol will be sold in multipacks only.
- No consumption of alcohol permitted on the premises.

Importantly, all spirits will be stored behind the counter and will not be available for self-selection. This provides direct supervision and an additional safeguard over higher-strength products.

In addition, and significantly, at all times the premises is open to the public, management will have in place a backup service of a Mobile Support Unit (MSU) or equivalent, with a minimum of two SIA-registered door supervisors operating from it. This provides access to immediate professional support should any incident arise.

Furthermore, the premises will become a member of the Brighton Crime Reduction Partnership (BCRP) or similar scheme approved by the Licensing Authority. This includes participation in the radio scheme and the exclusion/banning scheme of named individuals. This ensures real-time communication with neighbouring businesses and authorities and demonstrates a proactive approach to tackling local crime and disorder.

These measures go beyond what is typical for a small convenience store and are specifically designed to ensure the premises contributes positively to the area rather than negatively.

Prevention of Public Nuisance

The premises will operate within modest hours and does not seek late-night trading. The absence of single-can sales, high-strength alcohol, and on-site consumption materially reduces the likelihood of loitering or street drinking.

The frontage will be monitored and actively managed to discourage gathering and to maintain a tidy and orderly environment.

Protection of Children from Harm

I am fully aware of the proximity of BHASVIC and the presence of students in the area. Challenge 25 will be strictly enforced at all times. Staff training will be documented, refusals recorded, and there will be no external advertising or window displays promoting alcohol.

The premises is not intended to operate as an alcohol-led business. Alcohol will form part of a broader convenience retail offer and will be responsibly managed.

Density of Premises

While I understand concerns regarding the number of existing outlets, licensing law makes clear that applications must be determined on their individual merits. Competition between businesses or generalised concerns about saturation are not, in themselves, grounds for refusal unless it can be demonstrated that granting the licence would undermine the licensing objectives.

Given the comprehensive and enhanced conditions outlined above — including MSU support and BCRP membership — I respectfully submit that this application is both responsible and proportionate.

Conclusion

My intention is to operate a responsible, community-focused business that works constructively with residents, neighbouring businesses and the responsible authorities. In light of the safeguards outlined above, I respectfully invite you to reconsider your representation. I remain open to constructive dialogue should you wish to discuss any aspect of the application further.

Yours sincerely,

Isteph Ayoub
REDACTED

