

Appendix C

REP A

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

10/02/2026

SC CON END 17.02.2026 VALID PCD, PPN & CSA (A)

Dear Sarah Cornell,

Email: brighton.licensing@sussex.police.uk

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR SQUARE PIZZA STOP, 8 POOL VALLEY, BRIGHTON, EAST SUSSEX, BN1 1NJ UNDER THE LICENSING ACT 2003.

1445/3/2026/00177/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 2026) and the Revised Guidance issued under section 182 of the Licensing Act 2003 (November 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 City Safety Area (CSA) (as defined in the BHCC Statement of Licensing Policy (SoLP)) and seeks the following licensable hours for late night refreshment:

Late Night Refreshment (Indoors only)

Every day: 23:00 – 03:00

(although the application states '11am – 03am', Late Night Refreshment is only licensable from 23:00 onwards)

Opening Hours:

None listed

(we would expect this to have been filled out – the templated application form itself states on page 5 'In all cases complete boxes K, L and M' – this is not the case with this application).

In their newly published Statement of Licensing Policy (SoLP) (January 2026), Brighton & Hove City Council have adopted a 'City Safety Policy' which defines and designates certain areas of the city. Maps and definitions of these can be found on pages 18 – 24 of the SoLP.

Paragraph 3.1.2 states that:

'The CSA has the same borders as the previous Cumulative Impact Zone (CIZ). The CSA continues to be an area of special concern to the licensing authority because of the high levels of crime and disorder and public nuisance experienced within it. This is evidenced by

the police data which is

While the Cumulative Impact Zone has been replaced, the role of cumulative impact still *'remains a significant concern due to the high concentration of licensed premises within the CSA'* (Paragraph 3.26 of the SoLP). As part of this, BHCC have adopted a *'risk based approach along with the objective of encouraging a diversity of venues'* and this *'has formed the basis for our new Matrix Approach'*.

Paragraph 3.4 of the Brighton and Hove City Council 2026 SoLP is titled 'The Matrix Approach' and states at 3.4.2:

"A 'Matrix' approach to licensing decisions has been adopted and is set out below. It provides a firm framework of what the licensing authority would like to see within its area and gives an indication of the likelihood of success or otherwise to investors and businesses making applications. It underpins the City Safety Policy"

The licensing decision matrix on page 25 of the Council Statement of Licensing Policy (SoLP) suggests that new premises or premises licence variations asking for these licensable activities and hours – fast food venues - are a 'No'.

The explanatory notes on the Matrix – Section 3.4.3 of the SoLP and found on page 25-27 state:

*'a). **Applications within the CSA** will be subject to a special policy requiring robust measures to be included in the operating schedule to promote safety.'*

The applicant does not make mention of the BHCC Special Policy or the Statement of Licensing Policy (SoLP) within their application and have not included robust measures around safety. 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.

The SoLP notes at Section 3.2.2 that their *'special policy is underpinned by two key elements'* including:

3.2.4 Secondly, applications within the CSA will be expected to include in the proposed operating schedule robust additional measures (as appropriate to the nature and location of the venue) which are set out in appendix A. *These best practice measures place a special emphasis on safety, including measures to tackle drink spiking, unwanted sexual behaviour and the use of ID scanners. Before making an application within the CSA, applicants are expected to consult with the responsible authorities and seek advice on which measures are appropriate to include in the proposed operating schedule. Applicants should also be aware that the Licensing Authority will likely refuse applications within the CSA which do not comply with the Matrix Approach even where appropriate measures drawn from the appendix have been proposed: of itself, satisfying the requirements of the appendix will not be considered exceptional circumstances capable of justifying a departure from the Matrix.*

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.

While Sussex Police acknowledge that the premises application is not asking for the sale of alcohol,

disorder, anti-social behaviour and public nuisance in an area that is already evidenced to be

problematic.

In particular with this application they have stated under Section I (page 14 of the application) that *'Please note that our shop has no seating arrangements and will operate on a takeaway and delivery-only basis on a daily basis.'* Therefore what is being considered here does not have any restaurant element, it is strictly a 'fast food venue' as defined in the policy. No seating means that customers are highly likely to hang around outside while waiting for food, on a busy cut through near other late night venues. This increases the risk of interaction with other persons and the potential for crime & disorder and anti social behaviour to take place.

Paragraphs 14.21 and 14.22 of the Secretary of State's Guidance to the Licensing Act 2003 (November 2025) provides:

'14.21 In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport.'

14.22 Queuing in itself may lead to conflict, disorder and anti-social behaviour. Moreover, large concentrations of people may also attract criminal activities such as drug dealing, pick pocketing and street robbery. Local services such as public transport, public lavatory provision and street cleaning may not be able to meet the demand posed by such concentrations of drinkers leading to issues such as street fouling, littering, traffic and public nuisance caused by concentrations of people who cannot be effectively dispersed quickly.'

The applicant has offered some information under Section M of their application (pages 17-18) 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. They are not of a standard that is suggested in the BHCC SoLP and do not focus on improving safety or reducing levels of crime & disorder as is suggested at 3.2 of the Policy.

'3.2 Focus on safety as the central priority.'

*3.2.1 After careful consideration the Licensing Authority has decided to re-designate the area formerly covered by the CIZ as a CSA in order to **make safety the overriding focus and priority in and around licensed venues**. In doing so the Licensing Authority's objective is to maximise protection for everyone participating in the night-time economy, particularly people visiting, working and living in the city centre. It is recognised that cumulative impact continues to be a feature of the CSA but by careful scrutiny of licence applications and **mandating robust safety policies the Licensing Authority's aim is to improve safety by reducing levels of crime, disorder and public nuisance (and their associated harms) and so promote the licensing objectives within the CSA.'***

As previous stated, the BHCC *'special policy is underpinned by two key elements':*

*Licensing Authority acting as a responsible authority will generally make relevant representations objecting to the grant of a licence in these circumstances). As explained further below, the Matrix Approach will not be applied inflexibly but **the Licensing Authority***

will only depart from it in exceptional circumstances.”

Sussex Police 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. We 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. Finally, what is offered does not evidence that special attention has been paid when drawing up an operating schedule and does not hold up under initial scrutiny.

Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application in light of the Police concerns, local issues and the Local Authority special policy.

Yours sincerely,

REDACTED

Sgt Mark Redbourn o.b.o. Insp Ben Morrison

Operations, Planning & Events (inc. Licensing)

Inspector Brighton & Hove Division

Sussex Police

REP B

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

Date: 11 February 2026
Our
Ref: 2026/00094/LICREP/EH
Email: REDACTED

SC CON END 17.02.2026 VALID PCD, PPN & CSA (B)

Dear Sarah Cornell

Licensing Act 2003

Representation to the application for a New Premises Licence - 2026/00177/LAPREN

Square Pizza Stop – 8 Pool Valley, Brighton, BN1 1NJ

I refer to the application made by Southcoast Biryani Ltd for a new Premises Licence to be granted for the above premises. The Licensing Team, in its role as 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 and to uphold our Statement of Licensing policy (SoLP). [Statement of Licensing Policy 2026](#)

The applicant has applied for a new Premises Licence for late night refreshment every day from 11.00 to 03.00 (although the application states 11.00 to 03.00, a late night refreshment licence is only required between 23.00 and 05.00). In the application the premises is described as follows: “Square Pizza Stop serves a delicious range of pizzas, chicken, burgers, and more—freshly made and packed with flavour. Take Away Food Only”. The application also states: “Please note that our shop has no seating arrangements and will operate on a takeaway and delivery-only basis on a daily basis”.

This premises falls within the Licensing Authority’s City Safety Area (CSA). The CSA is an area of special concern to the licensing authority because of the high levels of crime and disorder, and nuisance experienced within it (SoLP 3.1.2). This is evidenced by the police data, which is attached to Appendix E of the SoLP.

Before submitting an application within the CSA, applicants are expected to consult with the Responsible Authorities and seek advice on which measures are appropriate to include in the proposed operating schedule (SoLP 3.2.4). The applicant did not undertake consultation with the Licensing Authority before submitting this application.

The SoLP goes on to say that applications within the CSA will be expected to include in the proposed operating schedule robust additional measures (as appropriate to the nature and location of the venue) which are set out in Appendix A. [Statement of Licensing Policy Appendix A - Licensing Best Practice Measures](#) These best practice measures place a special emphasis on safety. (SoLP 3.2.4)

On looking at the application form, particularly section M (licensing objectives), I acknowledge that the applicant has proposed some positive conditions to support the licensing objectives.

However, there is no mention of our SoLP or the premises location within the CSA and with the late hours applied for I would expect to see more robust conditions such as those in Appendix A of the SoLP.

The Council's SoLP also includes A 'Matrix' approach to licensing decisions (set out at 3.4 of the SoLP). It provides a firm framework of what the licensing authority would like to see within its area and indicates the likelihood of success or otherwise to investors and businesses making applications.

All applications within the CSA will be scrutinised against the Matrix Approach meaning that applications which do not comply with the Matrix are likely to be refused (and the Licensing Authority acting as a responsible authority will generally make relevant representations objecting to the grant of a licence in these circumstances). (SoLP 3.2.3). Even where appropriate measures drawn from the appendix have been proposed. Satisfying the requirements of the appendix will not be considered exceptional circumstances capable of justifying a departure from the Matrix. (SoLP 3.2.4)

All applications will be considered on their own merits. (SoLP 3.2.7) The Matrix Approach will not be applied inflexibly, but the Licensing Authority will only depart from it in exceptional circumstances. (SoLP 3.2.3)

With regard to the Matrix approach, the applicant has failed to address this, and I cannot see any offered exceptional circumstances for departing from the Matrix, where it clearly indicates that 'fast food premises' in the CSA should not be granted.

I make this representation on behalf of the Licensing Authority in its function as a guardian of our Statement of Licensing Policy as the application made is contrary to policy. The Matrix approach states no new fast-food premises should be granted in the CSA. Granting this application is likely to add to the additional burdens and problems within the CSA. I would therefore ask that the Panel determine the outcome of this application and whether the applicant has demonstrated exceptional circumstances to depart from our policy. In the absence of exceptional circumstances, I invite the Panel to refuse the application.

Yours sincerely

REDACTED

Emily Fountain

Licensing Officer

Licensing Team

