

## **Appendix C**

### **REP A**

**From:** Brighton Licensing <Brighton.Licensing@sussex.police.uk>  
**Sent:** 13 February 2026 14:31  
**To:** Corinne Hardcastle <corinne.hardcastle@brighton-hove.gov.uk>; EHL Licensing <ehl.licensing@brighton-hove.gov.uk>  
**Subject:** Representation - Cosies Bar & Tap Room, 10 Dyke Road, Brighton

### **CH CON END 25.02.2026 VALID PCD, PPN and PCH (A)**

Dear Corinne Hardcastle,

### **Re: New premises licence application for Cosies Bar & Tap Room, 10 Dyke Road, Brighton, BN1 3FE under the Licensing Act 2003.**

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the above premises licence application on the grounds that the prevention of crime and disorder, prevention of public nuisance and protection of children from harm licensing objectives are not being promoted should this licence application be granted. We also refer to the Brighton & Hove City Council Statement of Licensing Policy Jan 2026 (SoLP) and the Public Health Framework for assessing alcohol licensing July 2025.

This is a new licence 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 Stress Area (as defined in the SoLP) and seeks the following hours and licensable activities:

#### **Supply of alcohol – on and off sales:**

Tuesday through to Friday: 14:00 – 23:00  
Saturday through to Sunday: 12:00 – 23:00

#### **Provision of recorded music – indoors:**

Tuesday through to Friday: 14:00 – 23:00  
Saturday through to Sunday: 12:00 – 23:00

#### **Hours premises are open to the public:**

Tuesday through to Friday: 14:00 – 23:00  
Saturday through to Sunday: 12:00 – 23:00

The general description of the premises given within the application is a 2 floor commercial premises (ground floor and basement). Seating provided to customers to enjoy food, alcoholic, and non-alcoholic beverages on both floors and within a small terrace area outside to the front of the building.

Following us consulting with the applicant once the application was submitted, Sussex Police are unable to support this application over concerns that the venue is to be run predominately as a wet led venue (bar) as opposed to a food style operation. Although the premises sits within the Special Stress Area (SSA), it is right on the dividing line between the SSA and the City Safety Area (CSA) and very much within the city centre location. Less than 2-minute walk from the proposed premises, you find yourself in Churchill Square, West Street, North Street and Queens Road. All of which sit within the CSA. The location is saturated with licensed venues: pubs, bars, clubs, off licences, cafes, restaurants, and fast-food outlets. Permitting more is likely to increase the negative impact, especially licenses focused on alcohol provisions.

### **Brighton & Hove City Council Statement of Licensing Policy Jan 2026 (SoLP):**

The Brighton & Hove City Council Statement of Licensing Policy has recently gone through a full public consultation review with the new revised edition going live in January of this year. Much of the policy decision within it is based around updated crime data supplied by Sussex Police.

As we have mentioned, the premises sits within the Special Stress Area as defined within the policy.

Section 3.3.2 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 area will be kept under review.

The Matrix Approach within the policy does support a bar / café / restaurant within the SSA however, due to the very central location, the crime data we provide below, evidences the points under section 3.3.2.

Within the application, the applicant makes no reference to this local policy and although not a requirement under the Licensing Act, is seen as good practice, to pre consult with the responsible authorities. Had this been done, we could have raised all our concerns prior to the application being submitted. Additionally, section 18 of the application, part which gives the applicant the opportunity to display how they will promote the licensing objectives and gives us the opportunity to see what risks they have considered is very limited in detail. Policies around spiking, vulnerability and conflict management are all missing from the application. Yes, these could be added now that it has been brought to the applicant's attention, but why were these risks not considered beforehand.

### **Communication with the applicant:**

As mentioned, there was no pre consulting with Sussex Police however, once we had sight of the application, we did reach out to the applicant to ask several questions. This was to assist us in gaining a more informed awareness of the operation they are planning to operate. What we ascertained from this, is that the venue is going to be more of a drinking one rather than food led.

During this we established that food has been included in the description as a possible future option. For now, any food options would be by them sourcing this from a third-party off-site operator such as a local pizza restaurant. The applicant informed us that as the operation will predominantly be around the provision of alcohol, the later in the day trading hours are being applied for as opposed to being open from the morning to be more like a cafe.

We feel that even if a condition that substantial food would be available at all times i.e. café style, rather than it being a requirement to have alongside an alcoholic drink i.e. restaurant style, this venue is going to be wet led and operated as a bar. Any food offering would be very limited in choice and as possibly not investing in a kitchen and chef, not overly promoted.

### **Crime data & Public Health Framework for assessing alcohol licensing:**

12-month period: 12<sup>th</sup> Feb 2025 – 11<sup>th</sup> Feb 2026

Within a 200-meter radius of the premises we have the crime data recorded as being: 209 violence against the person, 129 public order offences 38 robbery, 36 drug offenses and 20 sexual assaults. There were also 955 thefts recorded; however, this would also include shoplifting which would not be a consideration for this application.

We acknowledge that not all of these will be linked to alcohol and licensed premises however, with these crime types alcohol often plays a part, be that being under the influence of alcohol and causing crime or becoming the victim due to the persons intoxication level.

Currently we unable to provide data of crime reports based on alcohol consumption within the 200-meter radius, we can however do this for the relevant ward as a whole, this being a larger area.

Regency Ward: 509 crimes recorded where intoxication played a part. In addition to this, 147 crimes recorded against persons intoxicated and being the victim and 27 with the victim under the influence of both alcohol and drugs. Total of 683 alcohol related crime reports.

When comparing the above with the Public Health Framework for assessing alcohol licensing, Regency ward is ranked top out of 23 wards for sexual offences and injury caused by violence. Its also ranked 2<sup>nd</sup> highest for violence against the person, non-injury assaults, and criminal damage.

The above data fully backs the local policy around the SSA and the statement that it has relatively high levels of crime and disorder and nuisance experienced within it. It's for this reason we are unable to support a new licence in this location that would enable it to operate as a bar rather than food focused with alcohol ancillary to that.

Further considerations are the additional safeguarding initiatives that operate within the city such as Beach Patrol, Safe Space and Night Safety Marshals. Some of which

are operated by volunteers and supported financially by Sussex Police. Without these organisations in operation, the figures above would be even higher and the fact we need these initiatives within our city, further evidences the negative impact alcohol has.

### **Off Sales:**

When considering the off sales element of the application, there is limited control the licence holder will have once the drinks have left the premises. There is then a risk of proxy sales to both under 18's and persons that could already be intoxicated. Consuming in public spaces causing ASB or mixing alcohol consumption with the sea if they head to the beach which is not something we can promote. We have seen persons lose their lives in Brighton & Hove as well as other parts of the country in coastal resorts due to misadventure, by way of being intoxicated and then getting into difficulty in the water.

### **Conclusion:**

We are unable to support this application and are seeking refusal. We did offer the applicant an option of looking at a restaurant licence in that alcohol is ancillary to a table meal, but this was declined. Also suggested was to seek out a venue that might be on the market that already holds a licence with conditions and operating schedules that might suit the trading style he is aiming for.

We believe there will now be a panel hearing and if following that, the panel are satisfied that by granting a licence they believe there will be no negative impact on the licensing objectives, we have included several conditions that we ask them to consider adopting. They are focused on a café style operation as food was mentioned in the original application however, the panel members will need to have confidence in the applicant being able to adhere to such conditions, as the availability and the promoting of food is key. Reduced trading hours is also suggested to 22:00 and on sales only to bring it in line with policy.

Taking into consideration our comments above along with the crime data provided and the offer of a restaurant style licence that we could have supported being declined, Sussex Police are seeking refusal and invite the Licensing Authority to seriously consider this.

Yours sincerely,

REDACTED

Sgt Mark Redbourn o.b.o Insp Ben Morrison  
Operations, Planning & Events (inc. Licensing) Inspector  
Brighton & Hove Division  
Sussex Police



**REDACTED**  
Police Licensing Officer  
Level 4 PALO Qualification

**Brighton & Hove Licensing**  
**John Street, Brighton.**  
**REDACTED**

### **Cosies Bar & Tap Room – Police proposed conditions – Café Style**

#### **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. The on sale of alcohol shall be consumed by persons seated at tables via waiter/waitress service with no vertical drinking.
3. An onsite operational kitchen should be in place with substantial food available at all times alcohol is offered for sale.
4. At all times, food menus must be clearly displayed and include a selection of hot food options.
5. Alcohol is ancillary to other hot and cold non-alcoholic beverages available.
6. No beer, lager, cider or perry with an ABV 6% or above shall be sold save that this shall not apply to premium beer, lager, cider or perry with an ABV 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event.

#### **Prevention of Crime and Disorder:**

5. Subject to GDPR guidance and legislation:

(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 entrances/exits to the premises as well as any outside space. 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) 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 Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

(g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - [brighton.licensing@sussex.police.uk](mailto:brighton.licensing@sussex.police.uk)

(h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by 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. a) An incident and refusals log (book or electronic) will be maintained showing a detailed note of incidents and refusals that occur in the premises. The logs will be inspected and signed off by the Designated Premises Supervisor (or a person with delegated authority) at least once a month.

b) The logs should be kept on the premises for at least twenty-four (24) months and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as

being one which involves an allegation of a criminal offence. Refusals of alcohol for reasons such as underage, no ID and intoxication.

7. The premises will become a member of the Brighton Crime Reduction Partnership (BCRP) or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy.
8. SIA licensed door supervisors shall be employed on any occasion when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. The written risk assessment will consider information or guidance offered by the police and also considering busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority.

**Public Safety: -**

**Prevention of Public Nuisance: -**

**Protection of children from harm:**

9. 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, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards 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, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it.
10. Signage advertising the "Challenge 25" policy will be displayed in prominent locations.
11. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training

will take place prior to the selling and or serving of such products and will include:

\*The lawful selling of age restricted products:

Including but not limited to, the requirement for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place.

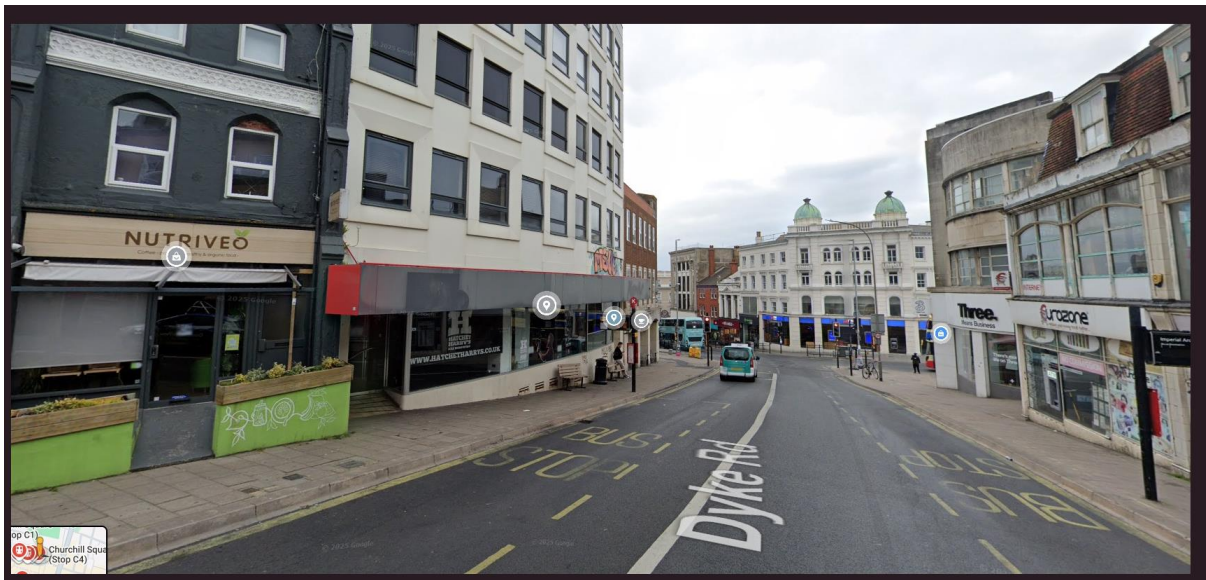
\*Vulnerability and Spiking.

\*Conflict management.

\*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. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.



## **RESPONSES FROM APPLICANT TO POLICE REPRESENTATION**

### **Cosies Bar & Tap Room – Police proposed conditions – Café Style 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. - **agreed**
2. The on sale of alcohol shall be consumed by persons seated at tables via waiter/waitress service with no vertical drinking. - **agree with no vertical drinking, preference for customers to visit service area and carry drinks to their seats. I believe this will have no negative impact on the licensing objectives**
3. An onsite operational kitchen should be in place with substantial food available at all times alcohol is offered for sale. - **agree to substantial food offering, but in line with the timings and external provision options detailed in the appendix document. I believe this offers more options to the customers and a more reliable source of food provision vs managing the food provision “in-house”, as well as providing a more streamlined, fluid business model. I also believe that the medium-long term plan of having potential guest caterers will provide a big attraction to customers - quite often people will visit similar establishments specifically for the guest caterers food, meaning on future occasions there may be days where the business is more food-led**
4. At all times, food menus must be clearly displayed and include a selection of hot food options. - **agreed**
5. Alcohol is ancillary to other hot and cold non-alcoholic beverages available. - **not agreed**
6. No beer, lager, cider or perry with an ABV 6% or above shall be sold save that this shall not apply to premium beer, lager, cider or perry with an ABV 6% or above such as craft or speciality brands or brands produced by a micro-brewery, or brands produced to commemorate a national or local event. - **agreed**

### **Prevention of Crime and Disorder:**

5. Subject to GDPR guidance and legislation: **agree to the requirements laid out in point 5 to promote this licensing objective** (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 entrances/exits to the premises as well as any outside space. 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) 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 Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge. (g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk (h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by 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. a) An incident and refusals log (book or electronic) will be maintained showing a detailed note of incidents and refusals that occur in the premises. The logs will be inspected and signed off by the Designated Premises Supervisor (or a person with delegated authority) at least once a month. **Agreed**

b) The logs should be kept on the premises for at least twenty-four (24) months and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence. Refusals of alcohol for reasons such as underage, no ID and intoxication. **Agreed**

7. The premises will become a member of the Brighton Crime Reduction Partnership (BCRP) or similar scheme approved by the Licensing Authority. The scheme must operate, subject to local coverage, radios and additionally an exclusion/banning scheme of named individuals within both the day and nighttime economy. **Agreed**

8. SIA licensed door supervisors shall be employed on any occasion when a requirement is identified by the licence holder's written risk assessment or requested by Sussex Police in writing at least 48 hours in advance. The written risk assessment will be reviewed at least once every calendar year. The written risk assessment will consider information or guidance offered by the police and also considering busy periods such as Bank Holidays, Season Variations and other City Events e.g. Football, Pride, Music Events. The written risk assessment will be available on the premises for inspection by police and authorised officers of the Licensing Authority. - **I would appreciate further discussion on this point**

**Public Safety: - Prevention of Public Nuisance: - Protection of children from harm:**

9. 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, official Photographic Identity Cards issued by EU states bearing a hologram or ultraviolet feature, driving licences with a photograph, photographic military ID, biometric residence permit cards 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, the Licensing Authority and Trading Standards without the need to amend the licence or conditions attaching to it. **agreed**

10. Signage advertising the "Challenge 25" policy will be displayed in prominent locations. **Agreed**

11. (a) The Premises Licence Holder / Management shall ensure that all staff members engaged or to be engaged in selling and or serving of alcohol shall receive induction training. If this training is to be conducted in electronic form, it will at a minimum also include a face-to-face discussion session. This training will take place prior to the selling and or serving of such products and will include: \*The lawful selling of age restricted products: Including but not limited to, the requirement for the staff member conducting the transaction to ensure they do Challenge 25 checks regardless of any other staff member / door staff checks that may already have taken place. \*Vulnerability and Spiking. \*Conflict management. \*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. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request. **Agreed**

Wednesday 4th March 2026

**Subject: Premises Licence Application – Cosies, 10 Dyke Road, Brighton, BN1 3LE**

Dear Mark,

Thank you for your representation and for the continued dialogue in respect of our premises licence application.

Previously I've shared an appendix document with you, highlighting the measures the premises will implement to promote the licensing objectives, but I wanted to pick out and expand on a few of these which are more relevant to the concerns you have raised, in the hope that we might come to an agreement. We fully recognise the importance of promoting the licensing objectives, particularly the prevention of crime and disorder, and we are keen to work constructively with Sussex Police to address any concerns.

By way of clarification, the premises:

- Proposes hours of 14:00 – 23:00 on weekdays, 12:00 – 23:00 on weekends
- Will operate with a maximum capacity of 50 persons (including staff)
- Will be fully seated with no vertical drinking
- Will close the outdoor area at 22:00, with no amplified music externally

Our intention is to operate as a small, seated craft beer house with structured and genuine food provision, not as a high capacity or late night wet-led bar.

To provide reassurance, we are willing to incorporate a clear food condition, together with robust operational conditions including CCTV, challenge 25, incident and refusals log and a pricing structure that does not encourage excessive alcohol consumption.

Our appendix details that substantial food shall be available between the hours of 12:00 - 20:00 on the premises, as is common practice for many establishments where food and drink are complimentary to each other for the food provision to finish a few hours prior to premises closure. Our food offering is now backed by an agreement in principle with a named local food provider, which will consist of the following:

- Menu's placed on all tables for customers
- Customers can scan a QR code to place their order at their table, or order at the premises counter, based on preference
- Food will be delivered to the customer at their seat
- Food prepared by a long-standing, established catering specialist

We are confident that the above offering enables our potential customers to order and consume food whilst remaining seated in our premises, with minimal fuss, as they would if the food was prepared on site. Furthermore, by partnering with a catering specialist with a reputation for high-quality food, we believe customers will be drawn in by the food provision, as well as be more inclined to consume food, vs. an in-house alternative. Finally, we firmly believe this model of partnering with an established catering business gives continuity of supply to our premises and it's customers vs an in-house model, off-setting risks such as staff illness (particularly in-house chefs) to our proposed food provision model.

We believe these measures appropriately and proportionately address the licensing objectives and would welcome confirmation as to whether, subject to agreed wording, Sussex Police would be prepared to withdraw their objection as we are keen to resolve matters without/in advance of the hearing if possible.

Kind regards,

Harvey Siney  
**Director, Cosies (Brighton) Limited**

**From:** Brighton Licensing <[Brighton.Licensing@sussex.police.uk](mailto:Brighton.Licensing@sussex.police.uk)>

**Sent:** 12 March 2026 14:09

**To:** REDACTED

**Subject:** RE: Cosies Licence Application - clarifications around food provision

Afternoon Harvey,

Thank you for the further submission making it nice and clear what is being offered. Please ensure you have sent it also to the local authority, so the panel are fully aware.

I'm sorry but this is an application we are still unable to support. We strongly believe it will end up being more wet led then food and likely to cause breaches of licence issues further down the line, for this reason, we do need a licensing panel to make the final decision on it.

We appreciate the work you have done to try and address our concerns.

Kind Regards

Mark.

**REP B**

**From:** Sarah Cornell REDACTED

**Sent:** 19 February 2026 15:42

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

**Subject:** Representation for Cosies, 10 Dyke Road, Brighton, BN1 3FE - Ref:  
2026/00177/LICREP/EH

**CH CON END 25.02.2026 VALID PCD and PPN (B)**

Dear Corinne Hardcastle

**Re: Licensing Act 2003 - Representation regarding the application for a New Application for a Premises Licence For: Cosies, 10 Dyke Road, Brighton, BN1 3FE**

I refer to the application made by Cosies (Brighton) Limited, for a new Premises Licence to be issued for the above 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 & disorder and public nuisance and to uphold our Statement of Licensing Policy 2026 (SoLP), which came into effect on 5 January 2026.

The applicant has applied for a Premises Licence for alcohol for consumption on & off the premises and recorded music: Tuesday – Friday 14:00 – 23:00 and Saturday - Sunday 12:00 – 23:00 with the same opening hours.

The premises falls within the Special Stress Area (SSA), which the 2026 SoLP expressly retains as a designated area requiring extra scrutiny because of persistent levels of alcohol-related crime, disorder and nuisance. This was confirmed during the 2025 review of the policy, where the Committee agreed to retain the SSA in full.

The SoLP requires that premises within the SSA must provide robust, enhanced best-practice measures to mitigate the well-documented risks in this area (3.3.3 of the policy and Appendix A).

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.

The Matrix Model, states that in the SSA, Cafés would normally only be granted hours up to 22:00hrs, Food & Dining (Restaurant-type) venues, where alcohol is ancillary to a table meal, are generally more acceptable under the Matrix than alcohol-led premises, but they remain subject to restricted terminal hours and must demonstrate strong operational measures appropriate to the SSA. Off-licences are not supported in this area.

Guidance issued under S182 of the Licensing Act 2003 states that in completing an operating schedule, applicants are expected to have regard to the SoLP 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.

In this case, the operating schedule does not reference the SSA, nor does it acknowledge or respond to the expectations outlined in the newly adopted SoLP. There are a limited number of steps the applicant has added in the operating schedule but there are no positive, detailed and specific proposals in there addressing relevant local risks or why their proposal should be considered an exception to the policy.

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

**S1**

CH CON END 25.02.2026 VALID PCD, PPN and PS. (S1)

**12<sup>th</sup> February 2026**

**To: The Licensing Department, Brighton & Hove City Council**

**RE: Support for Premises Licence-COSIES (BRIGHTON) LTD -10 Dyke Road, Brighton, BN1 3FE.**

To whom it may concern,

We are writing as the Freeholder of the above mentioned property to support this application. Having owned this property since 2014 and through failed food-led tenancies, I believe the current proposal is the only viable way to ensure the site's long-term safety and commercial success. For example, the immediate previous tenant was in occupation for 5 years (with a 10 year lease) and we tried hard to work with them by giving significant rent arrears concessions over that period but they still could not make their cafe operation viable.

### **1. Rebutting the Food-Led Constraint**

Under the council's 2026 Statement of Licensing Policy, there is a preference for licencing food-led venues in the Special Stress Area (**SSA**). However, local

economic reality has shown that a "food led" model is not sustainable here albeit as a cafe recently. This is a low capacity unit and a traditional restaurant business would not be viable. It is currently vacant because it was not sustainable on food alone.

We firmly believe that a compact and sophisticated mixed-use, wet-led model with a high-quality food and beverage (tap room concept) offer that differentiates from high volume vertical drinking establishments is necessary for financial stability and to prevent the unit from falling into disrepair.

Furthermore, another recent trend that was not anticipated is changing eating dietary habits that are driving demand for less substantial food (smaller- portions), from an increasing more health and diet conscious consumer base and also more lower /zero alcohol alternative drinks that we understand the venue will be offering. I understand any off sales would be for the premium craft beers offered and these would be brewed locally for people to enjoy in their own homes.

## **2. Diversity and Public Safety**

The 2026 Policy supports a "diversity of premises" to reduce violent crime by attracting a wider age balance. This proposal moves away from a struggling cafe toward a professionally managed venue that will provide "active frontage". Currently, the small external forecourt is frequently occupied by rough sleepers when the unit is closed or vacant, plus creating persistent issues with litter, waste and anti social behaviour. This new business will provide the consistent management needed to keep this area clear and clean and improve the street scene which is much needed.

## **3. Shadow Licence Commitment**

As a committed local landlord, once the premises licence was granted we would apply for a Shadow Premises Licence. This would ensure that we maintain direct oversight of the site. So meaning that should the tenant fail to meet the council's "Good Operator" standards, we will have the immediate legal power to step in, ensuring the licensing objectives are always upheld.

We believe this application promotes the city's vision for a safe, inclusive, and vibrant night-time economy and represents the most sustainable and responsible use of the building.

REDACTED



