

Appendix C

REP A – SC valid on the grounds of PCD, PPN & PCH.

From: REDACTED <REDACTED >

Sent: 21 March 2026 13:03

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

Subject: Representation against premises licence application

To: Licensing Authority

Brighton & Hove City Council

I am a local business owner operating an off-licence within the vicinity of the proposed premises and therefore qualify as an interested party under the Licensing Act 2003.

I wish to make a formal representation against the application for Islingword local , 80 islingword road , brighton BN2 9SL on the grounds of the licensing objectives, namely:

- Prevention of crime and disorder
- Prevention of public nuisance
- Protection of children from harm

The premises is situated within a Special Stress Area as defined by Brighton & Hove City Council's Statement of Licensing Policy. This designation recognises that the area is already experiencing a high concentration of licensed premises and associated issues including anti-social behaviour, street drinking, and alcohol-related crime.

There are already numerous outlets selling alcohol in close proximity, including Southover Wines, Southover Convenience Store, Food & Wine stores, Down Stores, Family Shopper, SS Food and Wine, Elm Grove Food and Wine, Hanover Convenience Store, as well as a taproom and beer shop and several nearby pubs and bars. This demonstrates a significant concentration of licensed premises within a small area.

In my experience, the cumulative impact of these premises contributes to issues such as street drinking, anti-social behaviour, and alcohol-related nuisance, particularly during the evenings.

The premises is also located close to Lewes Road, an area which is well recognised by the Council as experiencing problems associated with a high density of off-licences and alcohol-related issues. Granting a further licence in close proximity risks adding to these existing concerns.

In addition, the area has a significant student population, which can lead to increased demand for alcohol and may contribute to higher levels of noise nuisance, street drinking, and anti-social behaviour, particularly during evenings and weekends.

Granting an additional premises licence is therefore likely to add to the existing cumulative impact within the area.

Furthermore, there are schools located nearby, including Elm Grove Primary School and Fairlight Primary and Nursery School. The increased availability of alcohol in close proximity to these schools raises concerns regarding the protection of children from harm, including the risk of underage access and exposure to alcohol-related behaviour.

In light of the above, I believe that granting this application would undermine the licensing objectives and contribute to the cumulative impact already being experienced within this Special Stress Area.

I respectfully request that the Licensing Authority refuses this application. In the alternative, I request that strict conditions are imposed to mitigate the impact.

Yours faithfully,

REDACTED

REP B – SC valid on the grounds of PCD & PCH.

From: REDACTED <REDACTED >

Sent: 21 March 2026 11:48

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

Subject: 80 Islingword Road BN2 9SL

Hello

I am a local resident living in BN2 REDACTED.

I would like to enquire about the application for the new licence at the above property in Islingword Road. The shop used to be a post office and was previously denied a licence to sell alcohol. There is already a shop just up the road which has always sold alcohol and so I see no reason why we need another. I have also been told that the new applicant for this shop has previously had shops in the town centre that have had a reputation for selling under-the-counter goods and also restricted items to underage kids, and has had trouble with the police involved. This is a residential area close to two schools and I would like to be reassured that this has been investigated and considered properly before the licence is granted.

I look forward to hearing from you,

REDACTED

REP C – SC valid on grounds of PCD, PPN & PCH

REDACTED	Date:	25 March 2026
Licensing Authority	Our Ref:	2026/00322/LICREP/EH
Brighton & Hove City Council	e-mail:	REDACTED
Bartholomew House		
Bartholomew Square		
Brighton		
BN1 1JP		

Dear **REDACTED**

Licensing Act 2003

Representation in regard to the application for a new Premises Licence

(Ref. 2026/00824/LAPREN) - Islingword Local, 80 Islingword Road, Brighton BN2 9SL.

I write to make a representation on behalf of the Council's Licensing and Trading Standards Team, in their capacity as a responsible authority, in relation to the above application for a new Premises for Islingword Local, 80 Islingword Road, Brighton BN2 9SL.

The applicant has applied for the sale of alcohol for 'off-sales', every day from 08:00 to 23:00.

This representation is made as the Licensing and Trading Standards Team have concerns that the application could have a negative impact on the licensing objective of Prevention of Crime and Disorder, Prevention of Public Nuisance and the Protection of Children from Harm. I also refer to the Special Policy contained within the Council's Statement of Licensing Policy (SoLP).

The premises are situated 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.

Looking at the application form, particularly section 18 (licensing objectives), the applicant has not addressed the premise's location within the SSA. They also have not demonstrated exceptional circumstances to depart from our policy or how they will not add to the existing negative cumulative effect in an area already saturated with licensed premises and experiencing high levels of crime and disorder.

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. The SoLP 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. Each application is still considered on its individual merit and there is discretion to depart from the Matrix approach policy in exceptional circumstances.

The decision-making Matrix of the Council's SoLP clearly shows that 'off licences' in the Special Stress area are not supported.

Granting this application may add to the additional burdens and problems in the Special Stress area. The Licensing Team act as guardians of the Council's SoLP and I make this representation on behalf of the Licensing Authority as I believe the application made is contrary to our policy and therefore invite the panel to carefully scrutinise the application and decide if it constitutes exceptional circumstances to depart from our policy.

Yours sincerely

REDACTED

Fair Trading and Licensing Officer

Licensing Team and Trading Standards

REP D – SC valid on the grounds of PCD & PPN

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

26/03/2026

Email: **REDACTED**

Dear **REDACTED**,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR ISLINGWORD LOCAL, 80 ISLINGWORD ROAD, BRIGHTON, BN2 9SL UNDER THE LICENSING ACT 2003.

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 (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 Special Street Area (SSA) (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 (Off the premises)

Every Day: 08:00 – 23:00

Opening Hours:

Every Day : 07:00 – 23:00

Paragraph 3.3.2 of the Brighton and Hove City Council 2026 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 in 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’.

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. They do not make mention of the BHCC Special Policy or the Statement of Licensing Policy (SoLP) within their application and 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.

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 and Challenge 25 the conditions offered fall short of the current city-wide standard and do not encompass the full range of conditions we would expect. Sussex Police 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.

Looking at incidents that Sussex Police have dealt with within 0.2-mile radius of the venue between 25th March 2025 and 25th March 2026 amongst others, 33 were for violent crime, 24 thefts and 6 public order. Although we acknowledge that not all these incidents are linked to alcohol, when looking at these crime types alcohol is often a factor. We also have concerns that permitting a further off licence so close to the Level and Lewes Road and so increasing the availability of alcohol could have a further negative impact within an area that already suffers from crime and disorder.

There is also the risk of alcohol being consumed within open spaces increasing anti-social behaviour and proxy sales to children and alcohol dependant persons. Therefore, Sussex Police include Crime statistics with a 0.35-mile radius that includes Lewes Road and The Level. This sees an increase in crime statistics to 232 Violent crime, 232 thefts and 43 public order among others.

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 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. Additionally, and what is offered does not evidence that special attention has been paid when drawing up an operating schedule. Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application in light of the Police concerns, local issues and Local Authority special policy.

Yours sincerely,

REDACTED

Operations, Planning & Events (inc. Licensing) Inspector
Brighton & Hove Division
Sussex Police

REP E – SC valid on the grounds of PCD, PPN & PCH.

From: REDACTED

Sent: 23 March 2026 13:50

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

Subject: Representation against licence application

Dear Licensing Authority At Brighton & Hove City Council

I am a business owner operating within close proximity to the proposed premises and wish to make a representation under the Licensing Act 2003.

Premise address : Islingword Local , 80 islingword road , Brighton BN2 9SL

My concerns relate to the licensing objectives of the prevention of crime and disorder, prevention of public nuisance, and protection of children from harm.

The premises is located within a Special Stress Area, where there is already a recognised concentration of licensed premises and associated issues. In my view, the addition of a further alcohol licence risks exacerbating existing problems within the area.

There are already a large number of shops and premises selling alcohol nearby, including convenience stores, off-licences, and licensed venues. This creates a cumulative impact, which is noticeable in terms of street drinking, noise, and anti-social behaviour, particularly during busy periods.

The proximity to Lewes Road is also a concern, as this area is known for issues linked to a high density of off-licences and alcohol availability. Granting another licence nearby may contribute further to these established problems.

In addition, the area has a significant student population, which can increase late-night activity and alcohol-related disturbance. This adds to concerns regarding public nuisance and disorder.

There are also schools within close distance of the premises, including Elm Grove Primary School and Fairlight Primary and Nursery School , The Nest day nursery .

The presence of these schools raises concerns about the potential impact on children and young people.

Taking all of the above into account, I believe that granting this licence would undermine the licensing objectives and add to the cumulative impact already being experienced.

I respectfully request that the application is refused. If the Licensing Authority is minded to grant the application, I request that strict and appropriate conditions are attached.

Yours faithfully,

REDACTED

