



Brighton & Hove Licensing Unit

Police Station
John Street
Brighton
BN2 0LA

Email: brighton.licensing@sussex.police.uk

REP A – Police SC valid on the grounds of PCD, PCH & CSA

17th April 2026

The Licensing Technical Support Officers
Brighton & Hove City Council,
Hove Town Hall,
Norton Road, Hove,
BN3 3BQ

Dear Sarah Cornell,

RE: APPLICATION TO VARY A PREMISES LICENCE FOR CAFÉ COHO, 83A QUEENS ROAD, BRIGHTON, BN1 3XE UNDER THE LICENSING ACT 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the granting of the above application on the grounds that it will undermine the Licensing Objectives of the prevention of crime and disorder and protection of children from harm. We also make reference to the Brighton & Hove City Council (BHCC) Statement of Licensing Policy.

This is a proposed application to vary a premises license (by way of the addition of off-license sales) 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) and seeks the following hours and licensable activities:

Retail of alcohol – off sales

It is believed this proposal is to fit in with the hours on the current premises licence.

Opening hours

Every Day: 07:00 – 23:00

Paragraph 3.2.1 of the Brighton and Hove City Council 2026 Statement of Licensing Policy states:

“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..”

In accordance with the Statement of licensing policy this application would be a “NO” as this would be adding off sales to this premises licence.

When considering the off-sales element, 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 persons and persons that could already be intoxicated. Consideration also needs to be given to the fact that the alcohol will be consumed in public spaces causing. The likelihood is that any alcohol purchased from this premises will travel down West Street to other locations including the beach or taken up into the train station. This location is a hot spot for Sussex Police.

Recent crime and disorder statistics states indicate that during the period of 17th April 2025 and 17th April 2026 there were 292 crimes linked to Queens Road and surrounding close by side roads which police have responded too.

Within this time frame there was 89 recorded crimes of violence against the person, 32 public offences, 8 sexual offences and concerningly there was 105 thefts.

44 of these crimes were linked to Alcohol and drugs, 18 reports for Violence against Women and girls and 17 Vulnerability.

With the area already experiencing high number of incidents which occur throughout the day and night, permitting a additional premises to have the off sales of alcohol may add to these statistics, Queens Road is already a busy thoroughfare road to and from the city centre and the train station and is populated with many Licensed premises all varying from Pubs, off licences and Late Night Refreshment venues.

The applicant did not pre consult with Sussex Police prior to submitting this application.

Although we are unable to support this application and are now seeking refusal, if the Licensing Panel are minded to grant this application at the hearing, Sussex Police ask the panel to consider the conditions such as limiting what alcohol can be sold and for what certain times. Sadly, there are no conditions that can address the risks once customers have departed with their alcohol. The risks of them becoming a victim of crime or them partaking in criminal activity is one that will need to be dealt with by the emergency services.

Therefore, Sussex Police invite the Licensing Authority to seriously consider refusing this application.

Yours sincerely,

REDACTED

**Ops Planning and 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.

REP B – Licensing

SC valid on the grounds of PCD, PPN and CSA.

Sarah Cornell
Licensing Team
Brighton & Hove City Council
Hove Town Hall
Norton Road
Hove
BN3 4AH

Date: 20 April 2026
Our Ref: REDACTED
Phone:
e-mail: REDACTED

Dear Sarah

**Licensing Act 2003 – Representation regarding the application for Variation of the Premises Licence for Café Coho, 83A Queens Road, Brighton, BN1 3XE
Variation Application Reference – 2026/00986/LAPREV**

I refer to the application for a variation of the Premises Licence for Café Coho, 83A Queens Road, Brighton, BN1 3XE. The premises already benefits from a premises licence permitting the sale of alcohol to persons seated at tables by waiter/waitress service and ancillary to a table meal. The variation proposes to add to the existing licence the sale of alcohol off the premises Monday to Sunday from 07:00 to 23:00 (which are the existing hours for sales of alcohol on the 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 and Disorder and the Prevention of Public Nuisance and to uphold our Statement of Licensing policy (SoLP). [Statement of Licensing Policy 2026](#)

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). I am not aware that the applicant undertook 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](#)

On looking at the application form, particularly section 18 (licensing objectives), I acknowledge that the applicant has proposed some positive conditions to support the licensing objectives. However, due to the premises location within the CSA, I would have expected 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 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). 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). **The Matrix indicates that 'off licences' in the CSA should not be granted.**

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)

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 "off licences" 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.

Yours sincerely

REDACTED

Licensing Officer
Regulatory Services - Licensing Team