

Appendix D

Subject: Response to Representations – Variation Application 2026/00986/LAPREV (Cafe Coho, 83A Queens Road, Brighton)

1 May 2026

Dear Ms Cornell,

I write in response to the representations submitted by Sussex Police and the Licensing Authority in respect of my application to vary the premises licence at Cafe Coho, 83A Queens Road, Brighton.

Firstly, I would like to thank both Responsible Authorities for their detailed feedback. I fully acknowledge the sensitivities associated with the City Safety Area (CSA) and the importance of upholding the licensing objectives, particularly in relation to the prevention of crime and disorder, public nuisance, and the protection of children from harm.

Having carefully considered the concerns raised, I would like to clarify the intention behind the application and propose a number of further amendments and strengthened conditions to ensure the operation of the premises remains low-risk, tightly controlled, and consistent with the licensing objectives.

1. Nature of the Application

This application is not intended to create or operate an off-licence. Cafe Coho is, and will remain, a food-led cafe and takeaway business. The proposed variation is to allow the limited sale of alcohol strictly ancillary to a substantial takeaway meal (for example, a hot main food item such as tacos), in a manner consistent with our existing on-sales operation.

Alcohol will not be sold with items such as pastries, cakes or other light refreshments, and I acknowledge this could have been made clearer in my original application.

Alcohol will not be sold as a standalone product, will not be displayed or promoted independently, and will not form a primary part of the business offer. The intention is to complement a premium food offering, not to introduce an alcohol-led use.

2. Amendments and Additional Conditions Offered

As part of these amendments, I have reduced the proposed hours for off-sales of alcohol from those originally applied for, in order to further limit any potential impact and address the concerns raised.

In light of the representations received, I am willing to formally amend and strengthen the operating schedule as follows:

1. Alcohol shall only be sold for consumption off the premises when purchased at the same time as a substantial takeaway meal and shall not be available for purchase otherwise.
2. All alcohol sales will be made at the point of ordering food and not as a separate or subsequent transaction.
3. Off-sales of alcohol shall be limited to the hours of 11:00 to 22:00 daily.
4. A maximum of two alcoholic drinks per transaction will be permitted.
5. Alcohol will be limited to a small, curated range of low-risk products (e.g. canned beer (not glass), wine, and pre-mixed cocktails). No high-strength beers, single cans, or spirits (other than pre-mixed products) will be sold.
6. Alcohol will not be displayed so as to be visible from outside the premises and will not be promoted as a standalone product.
7. The premises will not operate as an off-licence in any form, and alcohol will not be available for browsing, selection, or purchase independently of food.
8. No vertical drinking or consumption of alcohol will be permitted on or immediately outside the premises.
9. Clear signage will be displayed requesting customers not to consume alcohol in the vicinity and to leave the area promptly.
10. Challenge 25, refusals logs, staff training, and CCTV measures will continue to be rigorously applied and monitored.
11. Alcohol will not be sold to persons who appear intoxicated.

3. Matrix Approach and Exceptional Circumstances

I acknowledge that the Council's Statement of Licensing Policy Matrix indicates that new off-licences within the City Safety Area are unlikely to be granted.

However, I respectfully submit that this application does not fall within the spirit or intent of a traditional off-licence as envisaged by the Matrix. The proposed operation is fundamentally different in that alcohol is:

- Strictly ancillary to a substantial food purchase
- Limited in quantity (maximum two drinks per transaction)
- Not displayed, promoted, or available for standalone purchase
- Restricted to controlled hours and a curated product range

As such, the premises will not operate as an off-licence in practice, and the risks typically associated with off-licences in the City Safety Area — including street drinking, bulk purchase, and alcohol-led footfall — are not present in this model.

I therefore respectfully submit that the application represents an exceptional and appropriate departure from the Matrix, supported by robust conditions that ensure the licensing objectives are upheld.

4. Business Sustainability and Proportionality

The proposed variation also reflects the need for small, independent hospitality businesses to operate sustainably in a challenging trading environment.

Cafe Coho is a food-led business, and the limited addition of ancillary off-sales is intended to support the viability of that core offer, particularly in a high-footfall, transient location adjacent to the station.

Importantly, the model proposed does not rely on alcohol sales as a primary revenue stream, but rather as a modest enhancement to food purchases. The restrictions offered — including the requirement for alcohol to be sold only with a substantial meal, strict limits on quantity, and a curated product range — ensure that the operation remains low-risk and fundamentally different from an off-licence.

In this context, the application represents a proportionate and responsible approach that supports economic sustainability without undermining the licensing objectives or contributing to cumulative impact.

5. Commitment to the Licensing Objectives

I remain fully committed to promoting the licensing objectives and operating responsibly within the CSA. The additional measures proposed above are intended to provide reassurance that the variation will not contribute to crime, disorder, or public nuisance, and will instead operate in a controlled and low-impact manner.

I would welcome the opportunity to work with Sussex Police and the Licensing Authority to agree a suitable set of conditions ahead of the Licensing Panel hearing, if possible.

Thank you for your consideration.

Yours sincerely,
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