

Appendix C

CH valid on the grounds PCD and PPN

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

17/04/2026

Email: brighton.licensing@sussex.police.uk

Dear Corinne Hardcastle,

RE: APPLICATION FOR A NEW PREMISES LICENCE FOR V&M STORE, 62 NORTH STREET, BRIGHTON, BN1 1RH 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 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 City Safety Area (CSA) (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: 10:00 – 22:00

Opening Hours:

Every Day : 07:00 – 22:00

Paragraph 3.3.1 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.”

Further to this paragraph 3.2.3

“Firstly, although no longer subject to a blanket presumption of refusal, all applications within the CSA will be scrutinised against the new Matrix Approach (set out at 3.4 of the policy) 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)”

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. Sussex Police note they have made mention of the BHCC Statement of Licensing Policy (SoLP) within their application, but it is not felt that anything they have provided fully addresses the local concerns.

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.’

As mentioned, 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 are unable to keep any persons safe once the customers leave the premises with the alcohol.

No consideration has been given to events within the city centre such as pride or football matches which need police resourcing.

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.

North Street is a busy area of the city centre that leads to Churchill Square, West Street and is close to the beach and Pavilion Gardens so any alcohol purchased is likely to be consumed in these public areas.

Looking at the crimes that Sussex Police have dealt with within 0.1-mile radius of the venue between 17th April 2025 and 17th April 2026, there is **1185 reports**.

A concerning 516 are linked to thefts, 270 violence against the person, 158 Public order, 56 Drug offences, and amongst other crimes it should be noted there was 19 sexual offences.

152 are directly linked to alcohol and drugs, 25 linked to violence against women and girls and 46 vulnerable reports.

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.

Sussex Police fear a further premises with off sales in this location will add to these crime statistics, and Sadly the risks of a person 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 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

Please address all future correspondence to Brighton & Hove Licensing Unit, Police Station, John Street, Brighton, BN2 0LA.

CH valid on the grounds of PCD, PPN &PCH

Corinne Hardcastle	Date: 20 April 2026
Licensing Authority	Our Ref: 2026/00419/LICREP/EH
Brighton & Hove City Council	e-mail: REDACTED

G39, Hove Town Hall
Norton Road
Hove
BN3 3BQ

Dear Corinne Hardcastle

Licensing Act 2003

Representation in regard to the application for a new Premises Licence

(Ref. 2026/01014/LAPREN) – V&M Sussex Ltd T/A V&M Store, 62 North Street, Brighton BN11RH

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 licence for V&M Store, 62 North Street, Brighton BN11RH.

The applicant has applied for the sale of alcohol for 'off-sales', every day from 10:00 to 22:00.

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 and to uphold the Council's Statement of Licensing Policy (SoLP).

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.

The SoLP states 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 acknowledged the premises is situated within the CSA but they 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 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).

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) 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)

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 'off-licences' in the CSA should not be granted.

Granting this application may add to the additional burdens and problems in the City Safety 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

Donna Lynsdale

Licensing and Fair-Trading Officer

Licensing and Trading Standards Team

