

Appendix C

REP A

EF CON ENDS 02.06.2026 VALID PCD & PPN

From: [REDACTED]
Sent: 16 May 2026 18:50
To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>
Subject: Objection to the Premises Licence Variation Application – MSL Convenience Store Limited, 192–193 Lewes Road, Brighton BN2 3LA

I am [REDACTED], owner of [REDACTED]
[REDACTED]
at: [REDACTED]

I am writing to formally object to the premises licence variation application submitted by the above premises.

According to the application, the premises seeks to extend its alcohol sales hours to:

09:00 to 02:00 on Fridays and Saturdays
09:00 to 01:00 on Sundays to Thursdays

In my view, this variation would have a direct negative impact on the licensing objectives, in particular:

The prevention of crime and disorder

The prevention of public nuisance

Prevention of Crime and Disorder

Lewes Road is well known as one of the areas in Brighton most affected by crime and anti-social behaviour and has been identified by the relevant authorities as a High Concern Area.

As the owner of a business [REDACTED], I regularly witness issues involving intoxicated individuals, shouting, fights, disruptive gatherings, theft, vandalism, and repeated police attendance, especially during late-night hours. Since December 2021, I have personally worked night shifts in my shop and I hold a Personal Licence.

Despite my experience and qualifications, I regularly encounter difficult situations involving intoxicated individuals, most commonly after 11:00 pm. These incidents are often challenging and require the direct presence of the business owner or someone with substantial practical experience in handling sensitive and confrontational situations.

For this reason, I have not been able to find a suitable employee willing and capable of working night shifts with confidence and competence. Based on my experience, simply holding a Personal Licence or receiving training does not necessarily mean that a person can effectively manage the real challenges that occur on Lewes Road late at

night to the same standard as an owner who is personally present and actively managing the business.

I also have numerous CCTV recordings documenting incidents and disturbances that occur during late-night trading, and I am willing to provide these recordings to the Council or the Licensing Panel upon request.

Approximately seven months after taking over our business in 2022, my business partner, [REDACTED], and I applied to extend our alcohol sales hours by one hour, from 1:00 am to 2:00 am. The Council refused that application.

We fully accepted and respected that decision. After several years of daily practical experience operating during late-night hours, I am now firmly convinced that the Council made the correct and responsible decision.

Based on my current experience, I believe that extending alcohol sales hours to very late hours on Lewes Road is not in the public interest, regardless of who makes the application, including any application that I may personally submit in the future.

Extending alcohol sales until 1:00 am throughout the week and until 2:00 am at weekends would inevitably increase the existing levels of crime, disorder, and public nuisance in an area that already experiences significant problems.

Limited Experience of the Current DPS at This Premises

According to the records, the Designated Premises Supervisor (DPS), [REDACTED], has been responsible for this premises since 15 November 2023.

In my opinion, effective management of a premises in a sensitive location such as Lewes Road requires regular on-site presence and several years of direct practical experience dealing with the daily risks associated with alcohol-related crime and anti-social behaviour.

The DPS Is Also Responsible for Another Alcohol-Licensed Premises on the Same Road

[REDACTED] has also served as the DPS of [REDACTED] on Lewes Road since 2023.

That premises operates [REDACTED] and remains open after Premier Store currently closes at 11:00 pm. It has some of the longest alcohol trading hours on Lewes Road and frequently experiences late-night issues involving intoxicated individuals, gatherings, and public nuisance.

I am also aware of an incident a few months ago during which police attended the premises and it was closed during the night following a matter that required police intervention.

Given his responsibilities at another premises operating extended hours in a high-risk area, I have genuine concerns about whether he can provide effective and direct supervision of an additional premises seeking to sell alcohol until 2:00 am.

Recent Security Incidents in the Area

Approximately two months ago, there was a significant armed police response near the junction of Lewes Road and Elm Grove following reports of a person believed to be carrying a weapon, and the road was temporarily closed.

Although no weapon or suspect was ultimately found, the incident demonstrates the heightened security sensitivity of the area and reinforces the concern that any increase in the availability of alcohol during late-night hours may place additional pressure on the police and the local community.

No Genuine Need to Extend Alcohol Sales or General Trading Hours

There are already numerous premises in the area selling alcohol until late, including my own business, which trades until 1:00 am daily (and until midnight on Sundays) and is

[REDACTED] Premier Store.

In addition, [REDACTED], supervised by the same DPS, operates [REDACTED] and remains open after Premier Store currently closes at 11:00 pm.

There are also several other nearby premises licensed to sell alcohol until very late hours, including:

Liquor Hut Store – until 1:00 am daily and until 2:00 am on Saturdays

Boozyclouds Store – until 3:00 am daily

The Booze Corner – until 5:00 am daily

Accordingly, late-night access to alcohol is already widely available in the area, and there is no genuine need or clear justification for extending this premises' alcohol sales until 2:00 am.

I would also like to make clear that my objection is not limited to the extension of alcohol sales hours. I also object to any extension of the general opening hours beyond 11:00 pm, even if no alcohol is sold during those additional hours.

Based on my daily experience, simply keeping shops open late into the night increases gatherings in the area and is associated with higher levels of nuisance, disturbances, and anti-social behaviour.

Request

For all of the reasons set out above, I respectfully request that the Licensing Panel refuse the premises licence variation application submitted by MSL Convenience Store Limited in order to protect the licensing objectives and safeguard local residents and businesses.

Yours faithfully,

[REDACTED]

REP B

EF CON ENDS 02.06.2026 VALID PCD & PPN

-----Original Message-----

From: [REDACTED]
Sent: 17 May 2026 23:31
To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>
Subject: Objection to Premises Licence Variation Application – MSL Convenience Store Limited, 192–193 Lewes Road, Brighton BN2 3LA

To: Licensing Team – Brighton & Hove City Council

I am [REDACTED], co-owner and Designated Premises Supervisor (DPS) of [REDACTED]
[REDACTED]

I write to formally object to the application submitted by MSL Convenience Store Limited to extend alcohol sales until 2:00 am on Fridays and Saturdays and until 1:00 am on all other days.

As the DPS of a licensed premises [REDACTED], I am legally responsible for ensuring compliance with the licensing objectives and for maintaining the safe and responsible sale of alcohol.

I dedicate my full attention to supervising this single premises. I work there daily during daytime hours and remain in continuous contact with the operation, including making visits and checks during late-night hours whenever necessary to ensure full compliance with the licensing objectives.

From my direct experience, managing a licensed premises on Lewes Road requires regular on-site presence and ongoing supervision due to the recurring issues associated with alcohol-related crime and anti-social behaviour in this High Concern Area.

[REDACTED] is also the DPS of [REDACTED]
[REDACTED]

I therefore have genuine concerns as to how [REDACTED] can provide effective and direct supervision of two alcohol-licensed premises on the same high-risk road, one [REDACTED] and the other seeking permission to sell alcohol until 2:00 am.

Although I mainly work daytime shifts, I deal daily with the operational consequences of incidents that occur during late-night trading, including customer complaints, security concerns and the wider impact of anti-social behaviour in the immediate area.

I would also note that this premises was the subject of regulatory concerns raised by the Council and Trading Standards in 2018, when it operated under a different name.

Those concerns included issues relating to compliance with licensing requirements and product safety. While the current management may be different, this history reinforces the need for caution when considering any application to extend alcohol sales at this address.

In my experience, Lewes Road is already saturated with premises selling alcohol until very late hours, and there is no operational or community need for further late-night alcohol availability at this location.

The proposed extension would, in my opinion, increase the risk of:

- Crime and disorder
- Anti-social behaviour
- Noise and disturbance
- Pressure on neighbouring businesses
- Safety concerns for customers and staff

As a DPS myself, I know that the practical challenges of managing a licensed premises in this area become significantly more difficult after 11:00 pm, particularly when intoxicated individuals are involved.

As a Designated Premises Supervisor, I fully understand that this is not a nominal title but a direct legal responsibility to ensure that the licensing objectives are promoted on a daily basis. From my practical experience, managing even one licensed premises on Lewes Road requires constant oversight, active involvement and immediate responses to incidents, particularly during late-night hours.

Based on this experience, I find it difficult to see how one individual can provide effective and direct supervision of two alcohol-licensed premises on the same high-risk road, [REDACTED] the other seeking to sell alcohol until 2:00 am.

As both a co-owner and the DPS of a premises [REDACTED], I can state that there is no genuine operational or community need for this extension and that it is certain to increase the risks of crime, disorder, public nuisance and anti-social behaviour.

For these reasons, I respectfully request that the Licensing Panel refuse this application in order to protect the licensing objectives and safeguard local residents and businesses.

Yours faithfully,

[REDACTED]
[REDACTED]

REP C

EF CON ENDS 02.06.2026 VALID PCD & PPN

From: [REDACTED]
Sent: 17 May 2026 23:33
To: EHL Licensing <EHL.licensing@brighton-hove.gov.uk>
Subject: Objection to Premises Licence Variation Application –
1445/3/2026/01426/LAPREV

To: Licensing Team – Brighton & Hove City Council

Dear Licensing Team,

I am writing to object to premises licence variation application reference 1445/3/2026/01426/LAPREV relating to MSL Convenience Store Limited, 192–193 Lewes Road, Brighton BN2 3LA.

My name is [REDACTED] and I currently live at:

[REDACTED]

I am considering moving to Lewes Road in the near future for family reasons and I am currently looking for a suitable home in that area.

For this reason, I am concerned that extending alcohol sales until 2:00 am on Fridays and Saturdays and until 1:00 am on all other days would increase crime, anti-social behaviour and public nuisance in an area that already has many premises selling alcohol until late at night.

I believe there is no genuine need for additional late-night alcohol sales at this location, and I respectfully request that the Licensing Panel refuse this application.

Yours faithfully,

[REDACTED]

REP D

EF CON ENDS 02.06.2026 VALID PCD & PCH

From: Brighton Licensing <Brighton.Licensing@sussex.police.uk>

Sent: 20 May 2026 09:26

To: EHL Licensing <ehl.licensing@brighton-hove.gov.uk>; [REDACTED]
[REDACTED]

Subject: Representation - Lewes Road Convenience Store, 192 – 193 Lewes Road, Brighton

Dear Emily Fountain,

Re: Application to vary the premises licence for Lewes Road Convenience Store, 192 – 193 Lewes Road, Brighton, East Sussex, BN2 3LA under the Licensing Act 2003.

I write on behalf of the Chief Officer of Police for Sussex to raise a representation against the application to vary the premises licence for Lewes Road Convenience Store, 192 – 193 Lewes Road, Brighton on the grounds that the prevention of crime and disorder and protection of children from harm licensing objectives are not being promoted should this application be granted. We also refer to the Brighton & Hove City Council Statement of Licensing Policy Jan 2026 (SoLP), Public Health Framework for assessing Alcohol Licensing and the revised guidance issued under section 182 of the Licensing Act 2003 (February 2026).

This variation application is in an area of the city which under the Brighton & Hove City Council Statement of Licensing policy 2006, lies within the “Special Stress” area and seeks the following amends to their licence:

Amended supply of alcohol – off sales and hours open to the public:

Currently: Monday – Saturday 09:00 – 23:00 / Sunday 09:00 – 23:00

Amend to: Sunday – Thursday 09:00 – 01:00 / Friday – Saturday 09:00 – 02:00

Add late night refreshments for hot drinks only:

Sunday – Thursday 23:00 – 01:00 / Friday – Saturday 23:00 – 02:00

Condition removal:

Remove condition 7 under Annex 2 – Prevention of crime and disorder:

No single cans of 440ml or less of beer, lager or cider will be sold; only multipacks of 4 or more cans will be sold.

Reason given for this variation application is so that the operator can have a “level playing field” with the local competition. They also reference section 1.18 of the section 182 Licensing Act 2003 Guidance which states:

When making licensing decisions, all licensing authorities should consider the need to promote growth and deliver economic benefits.

We note there are no new conditions being offered to ensure that if these changes were granted, that they would not impact on the licensing objectives. Nor is there any reference to the Brighton & Hove Statement of Licensing Policy 2026 of which such an application goes against. Despite us previously working with the agent, they did not reach out and open discussions around this application prior to submission. Had they, we could have raised our concerns.

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 and addressing today's social challenges.

As we have mentioned, the premises sits within the "Special Stress" area (SSA) as defined within the policy.

Section 3.3.2 of the 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 area will be kept under review.*

Section 3.4 - The Matrix Approach – provides a firm framework of what the licensing authority would like to see within this area and gives an indication of the likelihood of success. An Off Licence within the "Special Stress" area is not supported.

Within the application there is mention that they wish to have trading hours similar to others in the locality. Section 3.7.1 of the policy addresses this in that it states:

The city safety policy and area as well as the special stress area apply to off- licences as explained in the matrix approach at 3.5. But in general where applications are made for new premises or variations to existing licences, and where the police or others make representations against the grant of a further licence for off sales, the council will give specific consideration to restricting the number, type, and the hours of premises selling alcohol exclusively for consumption off the premises, training and levels of staffing, are appropriate to ensure that the licensing objectives are promoted in what may be challenging circumstances.

To assist we list below convenience stores with off licence permission in the locality and their permitted trading hours. These are as per our system and might need full confirmation from the local authority. It evidences the area is already saturated and so the need to restrict further expansion of such premises.

Booze Corner 92 Lewes Road – 07:00 – 05:00
M&A Convenience 140-141 Lewes Road – 24hrs
Liquor Hut 53 Lewes Road – 08:00 – 01:00 (02:00 on Fri & Sat)
Wine me up 7 Lewes Road – 10:00 – 01:00 (Midnight Sunday)
BP 100 Lewes Road – 08:00 – 23:00
Sainsbury's 93 Lewes Road – 24hrs

Revised guidance issued under section 182 of the Licensing Act 2003 (February 2026):

We acknowledge the revised guidance that was issued in February of this year and section 1.18 and that is very much a decision for the local authority however, we are confident to say that this guidance is not to override the licensing objectives which is the cornerstone of the Licensing Act. Additionally, the guidance under section 1.19 states that *licensing committees should have regard to relevant local plans and strategies*. In this case, the Brighton & Hove City Council Statement of Licensing Policy Jan 2026.

Crime data:

Within a 400-meter radius of the premises, which covers the main part of Lewes Road, the Level, bottom end of Elm Grove and Ditchling Road – so all walking distance from this premises, police crime data between 19th May 2025 and 18th May 2026 reports: 20 sexual offenses / 190 violence against a person / 65 public order / 29 criminal damage / 26 robberies.

We know on recorded data that 67 of these, alcohol and or drugs played a part in the offenses, but this data is not always captured and the offenses above are often linked to alcohol consumption so the figure of 67 is likely to be higher.

On reviewing the Public Health Framework for Assessing Alcohol Licensing, Hanover & Elm Grove ward, of which this premises sits within, it is ranked the 2nd highest ward in Brighton & Hove for increasing or higher risk of drinking under health data.

Off Sales:

When considering off sales, there is limited control the licence holder will have once the drinks have left the premises. There is a risk of proxy sales to both under 18's and persons that could already be intoxicated. To assist with limiting alcohol dependent persons gaining access to alcohol, we have the conditions around minimum 4 cans to be sold. This often puts these items out of the price point for people that are looking for cheap drink to feed an addiction.

The location of the premises being close by to The Level should be taken into consideration. This is an area that at times requires additional policing focus and has previously had a multi-agency approach. Increasing alcohol availability into the early hours is not a positive move for this location.

Taking into consideration our comments, Sussex Police are seeking refusal and invite the Licensing Authority to seriously consider this. It will be for the applicant to evidence to the panel what their exceptional circumstances are to depart from policy and what safeguarding they will have in place to promote the licensing objectives.

Yours sincerely,

[REDACTED]
[REDACTED]
Licensing & NPT Sergeant
Brighton & Hove Division
Sussex Police

REP E

EF CON ENDS 02.06.2026 VALID PCD & PPN

From: [REDACTED]
Sent: 19 May 2026 00:05
To: EHL Licensing <EHL.Licensing@brighton-hove.gov.uk>
Subject: Objection to Premises Licence Variation Application – 1445/3/2026/01426/LAPREV

To: Licensing Team – Brighton & Hove City Council

Dear Licensing Team,

I am writing to object to premises licence variation application reference 1445/3/2026/01426/LAPREV relating to MSL Convenience Store Limited, located at 192–193 Lewes Road, Brighton BN2 3LA.

My name is [REDACTED] and I live at:

[REDACTED]

I am currently studying [REDACTED]
[REDACTED]

For approximately the past month, I have been training at [REDACTED]
[REDACTED], where I attend three mornings per week.

I also regularly travel along Lewes Road when commuting to and from [REDACTED]

Through my training at the shop and my regular presence in the area, I have become aware of the issues associated with this road, including problems involving intoxicated individuals, anti-social behaviour and public nuisance. The shop manager has been training me on how to deal with these situations when they arise.

Based on this experience, I am concerned that extending alcohol sales until 2:00 am on Fridays and Saturdays and until 1:00 am on all other days would increase crime, anti-

social behaviour and public nuisance in an area that already experiences frequent late-night problems.

I also believe that simply keeping this premises open after 11:00 pm, even if alcohol is not sold during those hours, would increase gatherings, noise and the presence of intoxicated individuals in the area. From what I have learned during my training, some intoxicated individuals may cause problems, attempt theft, or try to take products by force if they are told that alcohol cannot be sold to them under the terms of the licence.

I am also aware that there are already several premises in the area selling alcohol until very late at night, and I do not believe there is any genuine need for additional late-night alcohol sales or extended opening hours at this location.

For these reasons, I respectfully request that the Licensing Panel refuse this application.

Yours faithfully,

A solid black rectangular box used to redact the signature of the person making the statement.

REP F

EF CON ENDS 02.06.2026 VALID PCD, PPN & PCH

Emily Fountain
Licensing Authority
Brighton & Hove City Council
Bartholomew House
Bartholomew Square
Brighton
BN1 1JP

Date: 28 May 2026
Our Ref: 2026/00761/LICREP/EH
e-mail: [REDACTED]

Dear Emily Fountain

Licensing Act 2003

Representation to the application to vary a Premises Licence (Ref: 2026/01426/LAPREV) Lewes Road Convenience Store, 192-193 Lewes Road, Brighton BN2 3LA

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 to vary a premises licence for Lewes Road Convenience Store, 192-193 Lewes Road, Brighton BN2 3LA.

The applicant has applied to extend the times of the sale of alcohol for 'off-sales', from:

Monday – Saturday: 09:00 – 23:00 / Sunday: 09:00 – 23:00

to:

Sunday – Thursday: 09:00 – 01:00 / Friday – Saturday: 09:00 – 02:00

And to add Late Night Refreshment:

Sunday – Thursday 23:00 – 01:00 / Friday – Saturday 23:00 – 02:00

Also to remove Condition 7 under Annex 2 – Prevention of Crime and Disorder:

No single cans of 440ml or less of beer, lager or cider will be sold; only multipacks of 4 or more cans will be sold.

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 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 16 (licensing objectives), the applicant has not addressed the premise's location within the SSA. They have not proposed or offered any additional conditions to mitigate any potential risks of opening with a later terminal hour and also have applied to remove a condition relating to the sale of single cans which was clearly there to mitigate potential risks. They have also 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. Particularly in relation to the premises close proximity to 'The Level', and issues associated therein.

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 refuse this application.

Yours sincerely



Licensing Team and Trading Standards

