

Appendix B

Brighton & Hove City Council

Application for the review of a premises licence or club premises certificate under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form.
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

I Chief Insp Paul Nellis, Divisional Command, Brighton & Hove Police on behalf of Chief
Constable Joanne Shiner

(Insert name of applicant)

apply for the review of a premises licence under section 51 / apply for the review of a club premises certificate under section 87 of the Licensing Act 2003 for the premises described in Part 1 below (delete as applicable)

Part 1 – Premises or club premises details

Postal address of premises or, if none, ordnance survey map reference or description

Corner News & Booze (aka Best Deal Convenience Store)
178C Ditchling Road

Post town

Brighton

Post code (if known)

BN1 6JE

Name of premises licence holder or club holding club premises certificate (if known)

Mr Ihsan Baksi

REDACTED

Number of premises licence or club premises certificate (if known)

2026/01141/LAPRMV

Part 2 - Applicant details

I am

Please tick ✓ yes

1) an individual, body or business which is not a responsible authority (please read guidance note 1, and complete (A) or (B) below)

2) a responsible authority (please complete (C) below)

YES

3) a member of the club to which this application relates
(please complete (A) below)

(A) DETAILS OF INDIVIDUAL APPLICANT (fill in as applicable)

Please tick ✓ yes

Mr Mrs Miss Ms Other title
(for example, Rev)

Surname

First names

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Please tick ✓ yes

I am 18 years old or over

**Current postal
address if
different from
premises
address**

--

Post town

--

Post Code

--

Daytime contact telephone number

--

**E-mail address
(optional)**

--

(B) DETAILS OF OTHER APPLICANT

Name and address

Telephone number (if any)

E-mail address (optional)

(C) DETAILS OF RESPONSIBLE AUTHORITY APPLICANT

Name and address Chief Insp Paul Nellis c/o Brighton & Hove Licensing Unit Sussex Police John Street Brighton BN2 0LA
Telephone number (if any) REDACTED
E-mail address (optional) brighton.licensing@sussex.police.uk

This application to review relates to the following licensing objective(s)

Please tick one or more boxes ✓

- | | |
|---|-----|
| 1) the prevention of crime and disorder | Yes |
| 2) public safety | |
| 3) the prevention of public nuisance | |
| 4) the protection of children from harm | Yes |

Please state the ground(s) for review (please read guidance note 2)

Sussex Police contend that the following licensing objectives have been seriously undermined:

- The prevention of crime and disorder
- The protection of children from harm

Police Licensing have continuously attempted to work with the premises over a 12 month period to support the Designated Premises Supervisor (DPS) and Premises Licence Holder (PLH), Mr Ihsan Bakshi, to improve and comply with the conditions attached to the premises licence for 178C Ditchling Road.

Visits to the premises were carried out on 31st October 2025 and 21st January 2026 where breaches of the premises licence conditions were identified. Additionally, a Challenge 21/25 Test Purchase was carried out during the January visit which was failed by the member of staff present at the time.

A follow up meeting was held at John Street Police Station with Mr Ihsan Bakshi (DPS & PLH) on 19th March 2026. At this meeting proposed new conditions were discussed with Mr Bakshi to help support him and his staff to promote the licensing objectives effectively. Mr Bakshi subsequently submitted a Minor Variation to amend the conditions on the premises licence for Corner News & Booze (aka Best Deal Convenience Store) on 7th April 2026. This was then granted on 24th April 2026.

A period of three months was given to allow Mr Bakshi to implement the changes to conditions and train staff accordingly. Further visits by Police Licensing were then carried out on 22nd July 2026 and 3rd September 2026 where breaches of the premises licence conditions were again identified.

Despite intensive and prolonged intervention by Police Licensing, breaches of the premises licence conditions have persisted. Sussex Police contend there has been a failure to promote the licensing objectives by the Premises Licence Holder and Designated Premises Supervisor, Mr Ihsan Bakshi, and the staff he has employed.

Please provide as much information as possible to support the application (please read guidance note 3)

Corner News & Booze (aka Best Deal Convenience Store) is a licensed convenience store located on the corner of Ditchling Road and Upper Hollingdean Road. This is a residential area very popular with students, not far from London Road Station and close to Lewes Road.

The premises are authorised for the following licensable activities:

- Sale by retail of alcohol (off the premises):
Everyday 06:00 – 04:00
- Opening hours:
Everyday 06:00 – 04:00

The premises has a single floor and is a small shop with an entrance roughly at the centre of the shop front. The serving counter is located to the right as you enter and as well as alcohol, the rest of the premises stocks various items you would expect to see in a general convenience store e.g. food and household products.

Sussex Police are bringing the above premises to review following continued concerns that the licensing objectives of the prevention of crime & disorder and the protection of children from harm are being seriously undermined. This is due to a number of premises licence checks at the venue where breaches of the premises licence conditions have been identified, a failed Challenge 21/25 test purchase and a formal meeting at John Street Police Station. These issues have persisted despite an updating of conditions via a Minor Variation by the current PLH/DPS Mr Baksi, as well as ongoing guidance and opportunities for improvement that have not been acted on.

The premises were brought to the attention of Police Licensing on 5th September 2025 by investigation colleagues who had been trying to obtain CCTV from the venue. While the staff member there was helpful, there were issues around trying to download the footage as the staff member present did not know how to. The footage seen was noted by the attending PC to be of 'really poor quality'. A contact number for the staff member's boss was provided and follow up work was done to secure the footage. As a result of these initial difficulties, the premises was highlighted to receive a full licensing check from the Police Licensing Team in due course.

Below is a detailed list of the interactions, visits and meetings that Police Licensing have had with the premises from October 2025 onwards:

1. Friday 31st October 2025 – 22:50 – Full Licence Check

Police Licensing visited Corner News & Booze on 31st October 2025 at 22:50hrs to carry out a full licence check. The DPS, Mr Ihsan Baksi, was not present at the time of the visit but there were 2 other members of staff working who identified themselves as the DPS's brother and a 'neighbour/friend' who works with him. They stated that there were always 2 persons working in the premises from 23:00hrs, if not earlier.

PC Wade then carried out a full licensing inspection. She noted that Part B of the licence was displayed and correct. Part A of the licence was then gone through to ensure all conditions were being complied with. The following breaches were identified (condition number on licence (ref. 2019/04982/LAPRET) shown in **bold**):

1. The installed CCTV system will be suitably operated and maintained. CCTV footage will be stored for a minimum of 28 days, and the management will give full and immediate co-operation and technical assistance to the police in the event that CCTV footage is requested for the prevention and detection of suspected or alleged crime.

It was observed that CCTV was recording wrongly by 1 hour.

3. Challenge 21 Scheme in place whereby passport or driving licence ID to be accepted. A record of refusals of service will be kept.

While the licence condition states 'Challenge 21' PC Wade noted that there were 'Challenge 25' posters on display (which is the Police preference and city-wide standard). She spent a period of time inside the premises while completing the licence check and as this was Halloween evening, the shop was particularly busy. She witnessed a number of transactions taking place including:

- 2 young appearing customers (who presented as under 25 years of age) being served without any ID being requested. When the males were asked by PC Wade how old they were, they both presented ID which showed they were 20 and 21 years old.*
- A group of young presenting individuals, one of whom was intoxicated (in the opinion of PC Wade). A male with her attempted to purchase a bottle of wine and was asked for ID (likely only due to the presence of PC Wade and the previous interaction above). The male did not have any ID on him and so was refused. The intoxicated female then stated she would buy the wine. The male staff member looked to PC Wade and shrugged which was interpreted as a 'should I sell?', PC Wade suggested not really but that it was the staff members decision. He did then refuse the sale.*
- An older male, who PC Wade perceived as vulnerable due to his demeanour and presentation (he was mumbling to himself), entered the premises. The male staff member stated to PC Wade that this male always comes in and talks to himself or is 'drunk'. The male selected 4 x cans of K Cider (7.5% ABV) and placed them on the serving counter. The staff member again looked to PC Wade as if to ask, 'should I serve him?' PC Wade again suggested this was not the right thing to do. The staff member refused the sale and told the male customer it was because he was presenting as intoxicated. The customer became agitated and argued with PC Wade and the staff member stating he was only going home to drink them. He did eventually leave.*

PC Wade asked to see the record of refusals and watched the staff member record the 2 refusals she had seen during her visit. These were the first refusals recorded since August 2025. In total there were 6 entries for entirety of 2025 including the 2 for this evening.

Concerns were raised directly with the staff members present about their decision-making processes and the serving of persons who may be intoxicated, underage, alcohol dependant or vulnerable in another way. The staff member was reminded that evening by PC Wade that they have a personal responsibility to protect vulnerable people who are too young, intoxicated or who show other concerns, by actively making challenges. They were reminded that it was a condition on the licence to record every refusal of service.

This was also included in the breach letter to the DPS/PLH Mr Ihsan Baksi [Appendix 1] to highlight police concerns around decision making of members of staff working in the shop when he as DPS is not present to oversee alcohol sales.

It was noted that there were only 6 entries in the refusals book for the entirety of 2025 (10 months) and this included the 2 refusals PC Wade had witnessed that evening. Questions were raised around how often active challenges were being made, either for ID or intoxication, and whether these were being recorded properly.

2. Sunday 14th December 2025 – 18:50 – Breach letter (email)

PC Wade formalised what she had witnessed in a breach letter [Appendix 1] and sent this via email [Appendix 2] to the named PLH and DPS, Mr Ihsan Baksi, at the email address Police

Licensing held for him. PC Wade asked within this email that Mr Baksi respond to the letter accordingly.

3. Friday 2nd January 2026 – 18:00 – Hard Copy of Breach letter delivered

Having received no response to the email to Mr Baksi, PC Wade attended Corner News & Booze to hand deliver a hard copy of the breach letter [Appendix 1]. The member of staff present was given an envelope containing the breach letter and asked to pass this on to the DPS. They did provide a phone number but stated that he didn't have an email address. This was subsequently found to be incorrect and the email address that Police Licensing held on file for Mr Baksi was accurate.

4. Wednesday 21st January 2026 – 14:27 – Challenge 21/25 Test Purchase and Licensing Check

As part of Police Licensing's commitment to the protection of children from harm, test purchase operations are regularly carried out across Brighton & Hove. These include using persons over the age of 18 to visit premises and ensure they are adopting an age verification policy as per the mandatory conditions under Annex 1 (S19. 5 (1)). In the case of Corner News & Booze there was an additional condition on the licence (ref 2019/04982/LAPRET) stating:

3.Challenge 21 Scheme in place whereby passport or driving licence ID to be accepted. A record of refusals of service will be kept.

On 21/01/2026 a 20 year old male visited the store, selected a bottle of Asahi Lager and successfully purchased this without being asked to provide ID to confirm his age.

PC Wade and PALO Staplehurst then entered the store to speak to the staff member who served the male. The staff member gave his name as G [REDACTED] and stated he was part time and had only worked at the shop for approximately 3-4 weeks. He mentioned that he only works in the daytime.

As is usual practice, a full licence check was carried as part of this visit. A number of breaches were again identified, which are detailed below:

1.The installed CCTV system will be suitably operated and maintained. CCTV footage will be stored for a minimum of 28 days, and the management will give full and immediate co-operation and technical assistance to the police in the event that CCTV footage is requested for the prevention and detection of suspected or alleged crime.

CCTV was now showing the correct date and time on the visible TV screen but playback to check the 28 days recording could not be carried out as the staff member present could not operate the CCTV system.

2.A security mobile support unit will be used after the hours of 11pm.

G [REDACTED] was not aware of any security company when asked and couldn't provide any confirmation whether there was a contract in place or not. There was no paperwork readily available for him to check or show officers.

3.Challenge 21 Scheme in place whereby passport or driving licence ID to be accepted. A record of refusals of service will be kept.

As per the Test Purchase, a Challenge 21 scheme was not being adhered to as the 20 year old male was not asked for ID. This was despite Challenge 25 signs being displayed in the premises. When questioned why G [REDACTED] didn't ask the male for ID he stated that 'he looks over 18' and referred to him having a beard. The principles of Challenge 25 were explained to G [REDACTED] and he

was advised that photographic ID must be asked for when a customer presents as visually under 25 years of age (as designated by the posters displayed throughout the venue).

The refusals register was inspected by PC Wade and she noted there was only one entry since the last police visit on 31/10/2025 (nearly 3 months).

The breaches were particularly disappointing as there were minimal conditions on the premises licence (ref 2019/04982/LAPRET) and advice had already been provided via email and the hand delivered breach letter in December 2025.

Of note there was also small clear bags, pipes and grinders (drug paraphernalia) on sale at the counter [photo provided at Appendix 3]. The opinion of Police Licensing is that this not promoting the prevention of crime & disorder by stocking and selling these products.

5. Tuesday 27th January 2026 – 09:22 – Breach letter (email)

As a result of the above test purchase and licence check, a breach letter [Appendix 4] was produced which invited Mr Baksi (as PLH and DPS) to attend a follow up meeting at John Street Police Station with Police Licensing. This was sent via email [Appendix 5] to the same email address as the previous breach letter on 14/12/2026 which had now been confirmed as correct. Brighton & Hove City Council were also copied into this correspondence for their awareness.

6. Thursday 19th March 2026 – 12:30 – Meeting with DPS/PLH

Mr Baksi attended John Street Police Station for a meeting with PALO Hannah Staplehurst. During this meeting PALO Staplehurst went through Police Licensing concerns including the breaches of the licence conditions and the Challenge 21/25 test purchase failure. During the meeting advice was given on how to improve and what needed to be done to promote the licensing objectives. It was proposed that Mr Baksi apply for a Minor Variation to update the conditions on his premises licence. This would assist him and his staff to maintain the expected city-wide standard around operating procedures and record keeping, as well as promote and uphold the licensing objectives moving forwards.

This was followed up by an email to Mr Baksi at 16:14 [Appendix 6] thanking him for his attendance and providing the discussed proposed conditions [Appendix 7] for inclusion on a Minor Variation. A deadline for response and submission of a Minor Variation was given of Thursday 2nd April 2026.

Mr Baksi responded positively to this email at 23:48 [Appendix 8].

7. Tuesday 31st March 2026 – 15:30 – Email to DPS/PLH

PC Wade sent an email [Appendix 9] to Mr Baksi at his email address reminding him of the Thursday 2nd April 2026 deadline.

Mr Baksi responded at 15:39 the same day [Appendix 10] asking for further assistance as he was unsure how to submit the Minor Variation.

There were a number of emails back and forth between Mr Baksi and Police Licensing where he positively engaged and wanted to ensure the Minor Variation was submitted as discussed. These have not been included as they are largely administrative issues and ultimately the Minor Variation was submitted within the next 7 days.

8. Tuesday 7th April 2026 – Minor Variation

A Minor Variation application was received by Brighton & Hove City Council Licensing on 07/04/2026 and forwarded to Police Licensing for consultation on Wednesday 8th April 2026.

9. Wednesday 8th April 2026 – 12:41 - No representation raised (Email)

PALO Staplehurst (on behalf of Sussex Police Licensing) emailed Brighton & Hove City Council Licensing to confirm that there were no representations to be raised. [Appendix 11]

10. Friday 24th April 2026 – Minor Variation Granted

Following the end of consultation period for the Minor Variation and no representations being received, it was granted. The Minor Variation added updated and modern conditions to the licence to assist Mr Baksi moving forwards.

11. Wednesday 22nd July 2026 – 15:15 – Full Licence Check

A period of 3 months was allowed to elapse to give Mr Baksi a chance to implement all the updated conditions on the newly issued licence, train his staff and ensure all paperwork and record keeping was in place.

A full licence check was then carried out on 22/07/2026 by PC Wade. Mr Baksi was not present at the time of the visit and so the licence check was carried out with a male member of staff who stated he had worked at the shop for 'a long, long time'. It was noted that there was one page of Part B and one page of Part A (not required to be displayed) on display within the venue.

PC Wade reported the following breaches (condition number on current licence 2026/01131/LAPRMV highlighted in **bold**):

5. Subject to GDPR guidance and legislation:

a) Digital CCTV and appropriate recording equipment to be installed in accordance with Home Office Guidelines relating to UK Police Requirements for Digital CCTV System (PSDB Publication Number 09/05), operated and maintained throughout the licensable area of the premises. The system shall be on and recording at all times the premises licence is in operation.

b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.

c) CCTV footage will be stored for a minimum of 31 days.

d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.

e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.

f) The management of the premises will ensure that key staff are fully trained in the operation of the CCTV and will be able to download selected footage onto a disk (or other electronic portable device acceptable to Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk.

h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Police or for any other reason, the premises will be expected to install a replacement hard drive or a temporary replacement drive as soon as practicable.

The male member of staff was unable to operate the CCTV system to demonstrate that it was on, recording for 31 days and that footage could be accessed without difficulty or delay by Police. When he was asked by PC Wade to show her the system he stated, 'oh no, I don't like it, I can't'.

12. a) The Premises Licence Holder shall ensure that all staff members engaged or to be engaged, in selling alcohol at the premises shall receive induction training. This training will take place prior to the selling of such products:

- ❖ The lawful selling of age restricted products
- ❖ Refusing the sale of alcohol to a person who is drunk

b) Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 8 weeks, with the date and time of the verbal reinforcement/refresher training documented.

c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

The male staff member had stated to PC Wade that he had worked at the premises for 'a long, long time' however when asked about training he said that he had not received any alcohol training has never signed a training record. When asked if there were any training documents present for PC Wade to inspect the male staff member said he did not know what this was or where it would be.

12. Saturday 1st August 2026 – 17:51 – Breach letter (email)

PC Wade sent an email [Appendix 12] to Mr Baksi to inform him of the licensing check carried out on 22/07/2026 and included a breach letter [Appendix 13] outlining the findings. This letter advised the seriousness of the continued breaches and warned that Police Licensing were considering a review of the premises licence if these matters were not rectified.

13. Thursday 3rd September 2026 – 15:00 – Full Licence Check

A further month was given to ensure that Mr Baksi had time to rectify the points raised and respond to the breach letter should he wish to. PC Wade then revisited Corner Booze & News to carry out a full licence check on 03/09/2026.

Upon entering the premises, PC Wade noted that the member of staff, G [REDACTED], who failed the Challenge 21/25 Test Purchase on 21st January 2026 was working. PC Wade had previously been told by Mr Baksi that G [REDACTED] was no longer working there as a result of the failed Test Purchase. She completed a full licensing check with G [REDACTED] and noted the following breaches (condition number on current licence 2026/01131/LAPRMV highlighted in **bold**):

5. Subject to GDPR guidance and legislation:

a) Digital CCTV and appropriate recording equipment to be installed in accordance with Home Office Guidelines relating to UK Police Requirements for Digital CCTV System (PSDB Publication Number 09/05), operated and maintained throughout the licensable area of the premises. The system shall be on and recording at all times the premises licence is in operation.

b) The CCTV cameras and recording equipment must be of sufficient quality to work in all lighting levels inside the premises at all times.

c) CCTV footage will be stored for a minimum of 31 days.

d) The management will give full and immediate cooperation and technical assistance to the Police in the event that CCTV footage is required for the prevention and detection of suspected or alleged crime.

e) The CCTV images will record and display dates and times, and these times will be checked regularly to ensure their accuracy.

f) The management of the premises will ensure that key staff are fully trained in the operation of the CCTV and will be able to download selected footage onto a disk (or other electronic portable device acceptable to Police e.g. USB) or provide footage via an online link as initiated by Police, without difficulty or delay and without charge.

g) Any breakdown or system failure will be notified to the police immediately & remedied as soon as practicable. This can be via email - brighton.licensing@sussex.police.uk.

h) In the event of the CCTV system hard drive being seized as evidence as part of a criminal investigation by Police or for any other reason, the premises will be expected to install a replacement hard drive or a temporary replacement drive as soon as practicable.

G [REDACTED] was unable to operate the CCTV system and so 5 c) – 5 f) were unable to be inspected or verified.

8. a) An incident log will be maintained by the premises showing a detailed note of incidents that occur in the premises. The logs will be inspected and signed off by the DPS (or a person with delegated authority) at least once a week.
- b) The logbook should be kept on the premises and be available for inspection at all times the premises are open by authorised officers of the Licensing Authority or the police. An incident will be defined as being one which involves an allegation of a criminal offence.
- c) Any refusals made for alcohol service e.g. underage, will also be recorded (either in electronic or written form) and feedback given to staff as relevant.
- d) The log will be kept for a minimum of twenty-four (24) months.

PC Wade noted there had been no incidents recorded and the DPS (or person with delegated authority) had not signed the incident log since the PC Wade had signed the log on 21/07/2026. The refusals register (separate document) had 14 entries since 21/07/2026 but had also not been signed by the DPS (or person with delegated authority) since PC Wade signed the register on 21/07/2026.

12. a) The Premises Licence Holder shall ensure that all staff members engaged or to be engaged, in selling alcohol at the premises shall receive induction training. This training will take place prior to the selling of such products:

- ❖ The lawful selling of age restricted products
- ❖ Refusing the sale of alcohol to a person who is drunk

- b) Further verbal reinforcement/refresher training covering the above will be carried out thereafter at intervals not to exceed 8 weeks, with the date and time of the verbal reinforcement/refresher training documented.
- c) All such training undertaken by staff members shall be fully documented and recorded. All training records shall be made available to Sussex Police, officers of the local authority and officers from the Trading Standards team upon request.

When questioned by PC Wade whether he had signed any training documents on his return (following the assurances he had left employment at the premises), G [REDACTED] stated that he had not which is a breach of 12 c).

PC Wade also reviewed the premises licence plan on the current licence (ref: 2026/01131/LAPRMV) to ensure the layout was accurate. She noted that the current layout did not reflect what was drawn on the plan. Specifically, the licence plan shows the area to the right of the sales counter should be a 'locked beer and wine fridge' however, on her visit open wooden

shelves stocked with red wine were found there. She also noted that it would appear the premises were stocking a greater amount of alcohol in different places than shown on the floor plan.

A breach letter was not issued following this visit as the decision was made to move forward with the review process.

14. Sunday 6th September 2026 – 15:24 – Email received from Mr Baksi

An email was received from Mr Baksi [Appendix 14] offering an explanation as to why G [REDACTED] was working at the premises again on 03/09/2026 and attaching photos of the 'Written Authorisation for the Sale of Alcohol' and 4 x training records. These logs did not appear to show training for anyone by the name of [REDACTED] and no one by this name was included on the 'Written Authorisation for the Sale of Alcohol' form either.

While it is positive that Mr Baksi has now provided these documents, the other continued breaches of the premises licence conditions remain. As a result, Police Licensing have lost confidence in Mr Baksi as a responsible operator.

Police Licensing have acknowledged this email with a reply but believe that there is no other option than to move forward with the review process at this time.

Sussex Police have attempted to work with and advise Mr Baksi over the last 12 months with early interventions including visits, letters and meetings while following a stepped approach. We refer to the Home Office Guidance issued under Section 182 of the Licensing Act 2003 (February 2026) at point 11.10 where it states:

11.10 Where authorised persons and responsible authorities have concerns about problems identified at premises, it is good practice for them to give licence holders early warning of their concerns and the need for improvement, and where possible they should advise the licence or certificate holder of the steps they need to take to address those concerns. A failure by the holder to respond to such warnings is expected to lead to a decision to apply for a review. Co-operation at a local level in promoting the licensing objectives should be encouraged and reviews should not be used to undermine this co-operation.

Sussex Police contend it should not take repeated interventions and warning letters to ensure the conditions on the licence are being complied with and the licensing objectives promoted. Early intervention was made in this case with numerous opportunities for improvement.

The late-night operating hours of the premises (until 04:00 daily) add an additional element of risk when considering this venue. Opening into the early hours of the morning and allowing additional alcohol to be sold off the premises increases this risk. Therefore, compliance to any conditions attached to the premises licence is of extra importance to ensure that this additional risk is minimised and managed.

In considering all of the evidence available, Sussex Police has paid due regard to the S182 Guidance (para 11.19) of the Licensing Act 2003, which states the following:

11.19 Where the licensing authority considers that action under its statutory powers is appropriate, it may take any of the following steps:

- modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition), for example, by reducing the hours of opening or by requiring door supervisors at particular times;*
- exclude a licensable activity from the scope of the licence, for example, to exclude the performance of live music or playing of recorded music (where it is not within the incidental live and recorded music exemption);*

- *remove the designated premises supervisor, for example, because they consider that the problems are the result of poor management;*
- *suspend the licence for a period not exceeding three months;*
- *revoke the licence.*

While considering all the steps that the licensing authority can take, Sussex Police do not believe revocation is appropriate in this instance. Mr Baksi has shown willingness to work with Police Licensing over the last 12 months, including submitting a voluntary Minor Variation to update his premises licence conditions. Unfortunately, he has not been able to evidence he can reach a consistent satisfactory standard of adherence to the premises licence conditions.

Modification of conditions has been considered but the majority of the conditions were amended and updated during the Minor Variation process in April 2026. However, some additional proposed conditions are put forward to be added to the licence as follows:

- From 22:00 a personal licence holder must be on duty at the premises and shall supervise and authorise every individual sale of alcohol.
- When alcohol is not for sale or no personal licence holder is present at the premises, alcohol must be covered or locked away, so it is inaccessible to customers.

A personal licence holder from 22:00 is proposed as this is viewed as the highest risk time and covers the time period when PC Wade witnessed a large number of potential challenges in October 2025. It will ensure a suitably trained and qualified individual is on duty when Mr Baksi cannot be there and will hopefully mean that robust challenges are made for every sale of alcohol into the early hours of the morning.

Reducing the opening times or excluding a licensable activity from the licence is not felt to be necessary in this instance. The licence only authorises one activity – the sale of retail of alcohol - and so there is nothing else to be excluded. Additionally, Sussex Police have no additional evidence that the opening times are having a negative impact, this case is about compliance and ensuring that Mr Baksi is running a safe premises that is promoting the licensing objectives.

Removing Mr Baksi as Designated Premises Supervisor (DPS) will have minimal effect as he is also the Premises Licence Holder (PLH). There is no instrument under the Licensing Act 2003 to remove a PLH and so he will remain involved with the premises moving forward as the owner. It is believed he needs to spend more time at the premises in an active role as well as training and appointing suitably trained staff that he has confidence to sell alcohol responsibly in his absence. It is proposed he remain as DPS and be given an opportunity to rectify his lack of adherence and show positive improvement.

Sussex Police believe that a period of 8 weeks suspension of the premises licence would give Mr Baksi time to get all training, documents and a personal licence holder (if it will not be himself) in place. This is not intended to take away Mr Baksi's livelihood but to ensure that improvements are made, conditions adhered to and that ultimately, the licensing objectives are being actively promoted and upheld.

Giving regard to local policy and the Brighton & Hove Statement of Licensing Policy 2026, Sussex Police refer to Annex A (Page 69) – 'Problem Premises on Probation'. As part of a 'first intervention' we would suggest that points 8, 9 and 12 would be relevant here. We would contend that a proposed new condition requiring a personal licence holder to be on duty from 22:00 until close, a suspension of the premises licence for a period of 8 weeks (points 8 & 9) and a 'yellow card' (point 12) would be suitable in the case of Corner News & Booze (aka Best Deal Convenience Store). We also refer to point 3 (page 69-70) as relevant in this case:

3. Government wishes to support the enforcement agencies and licensing authorities by providing clear guidance on a "yellow card / red card" system, which would ensure a firm response to problems, but which give premises an opportunity to reform. The intention is that such a system

would be highly visible and send a clear message to alcohol retailers, and the public, that action will be taken against those who act contrary to the licensing objectives and the law.

In conclusion, Sussex Police request that the Licensing Authority seriously consider imposing the steps outlined above to prevent further ongoing undermining of the licensing objectives and to ensure offences under the Licensing Act 2003, S136 (1) and (4) (carrying out unauthorised licensable activities) do not persist.

Please tick ✓ yes

Have you made an application for review relating to the premises before

If yes please state the date of that application

Day	Month	Year

If you have made representations before relating to the premises please state what they were and when you made them

Please tick ✓ yes

- I have sent copies of this form and enclosures to the responsible authorities and the premises licence holder or club holding the club premises certificate, as appropriate
- I understand that if I do not comply with the above requirements my application will be rejected

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

Part 3 – Signatures (please read guidance note 4)

Signature of applicant or applicant's solicitor or other duly authorised agent (please read guidance note 5). **If signing on behalf of the applicant please state in what capacity.**

Signature **REDACTED**

.....

Date 16th September 2026

.....

Capacity Chief Inspector Paul Nellis (Brighton & Hove Divisional Command Team)

.....

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 6)	
PALO C Abdelkader Brighton & Hove Licensing Unit Sussex Police John Street	
Post town Brighton	Post Code BN2 0LA
Telephone number (if any)	01273 014167
If you would prefer us to correspond with you using an e-mail address your e-mail address (optional) brighton.licensing@sussex.police.uk	

Notes for Guidance

1. A responsible authority includes the local police, fire and rescue authority and other statutory bodies which exercise specific functions in the local area.
2. The ground(s) for review must be based on one of the licensing objectives.
3. Please list any additional information or details for example dates of problems which are included in the grounds for review if available.
4. The application form must be signed.
5. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
6. This is the address which we shall use to correspond with you about this application.

