

## Appendix C

### Consultation on the Statement of Licensing Policy (SoLP) 5 year review 2021 – Council’s on-line consultation portal – data analysis

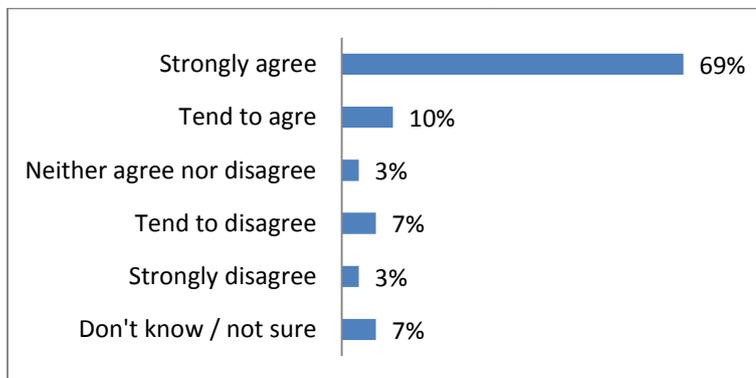
#### 1. Respondents

How are you responding to this consultation? As a...		Frequency	Percent	Valid Percent
Valid	Local resident	29	85%	91%
	As a representative of a local business	1	3%	3%
	As a representative of a local community or voluntary group	1	3%	3%
	As a representative of a stakeholder group	1	3%	3%
	Total	32	94%	100%
Missing	No response	2	6%	
Total		34	100%	

- The local business Raining Books, the CVS group was the North Laine Community Association and the stakeholder Sussex Police

#### 2. Cumulative Impact Assessment and Special Policy

**Do you agree or disagree with the proposal to maintain the Special policy on cumulative impact and to maintain the current Cumulative Impact Zone?**



Base: All residents who responded to the question (n=29)

- All three business, CVS and stakeholder respondents ‘strongly agree’ with the proposals.

Do you agree or disagree with the proposal to maintain the Special policy on cumulative impact and to maintain the current Cumulative Impact Zone?		
Strongly agree	Local resident	Because it is a positive policy which works to target/ reduce alcohol related harms.
Strongly agree	Local resident	Safe & unhindered movement of residents, public transport & Emergency services within City Centre must be strategically pl as need & monitored.
Strongly agree	Local resident	There are more than enough alcohol outlets in the north Laine and more than enough drunks regularly in the area!

Strongly agree	Local resident	We have a major problem in our city with anti-social behaviour and vandalism related to concentrated availability of alcohol. This is ruining the quality of life of those who just want to live a normal life, without noise and disturbance in our streets most evenings of the week. CIZs are one way of having some control over the number of such outlets in a concentrated area, provided the powers they give are actually exercised.
Strongly agree	Local resident	With the growing number of Airbnb properties which are causing anti-social behaviour, the last thing which is needed is making it easier to obtain alcohol in the area
Strongly agree	Local resident	We have considerable anti-social behaviour in the area fuelled by the ease of obtaining alcohol and the amount of drinking establishments.
Strongly agree	Local resident	If kept to it should help reduce antisocial behaviour.
Strongly agree	Local resident	The late night noise, anti-social behaviour and associated damage from late night sales of alcohol is incredibly disturbing to residents in a busy city centre. When I first moved here 20 years ago I could enjoy a good nights sleep and even leave the windows open in the summer. Nowadays the noise is constant and I have triple glazing and cannot open the windows.
Strongly agree	Local resident	Always trouble with drunks in North Laine where I live. 2 newsagents have changed hands & are now more like off licences selling a few magazines!
Strongly agree	Local resident	The impact of noise, anti-social behaviour and large groups congregating is significant in residential areas and needs to be kept to a minimum. There are already enough premises serving alcohol and they need to be reduced not expanded.
Strongly agree	Local resident	I live in an SSA area and see the detrimental effects of alcohol with too many licensed premises in a small area.
Strongly agree	Local resident	It is important that the number of premises selling alcohol in residential areas is monitored in order reduce noise, crime and anti-social behaviour.
Strongly agree	Local resident	Drinking alcohol gives rise to a great deal of anti social behaviour. Drinking it must be restricted in public places.
Strongly agree	Local resident	We live in the city centre and witness on a daily basis the negative impact of the large number of drinking establishments, combined with limited police resource and not enough community support for the many chronic alcohol and drug users who live in the city. This and the high number of out of control tourist drinkers are making Brighton an increasingly distressing place to live.
Strongly agree	Local resident	City centre is dangerous and to much alcohol related issues
Strongly agree	Local resident	There is already a huge number of licensed premises within the CIZ and beyond. They must be constantly monitored and controlled if need be.
Strongly agree	Local resident	I live on the edge of the zone near Trafalgar street. When I take my dog out in the evening at about 10pm there are already many intoxicated people wandering around and that number increases as the night goes on. I believe that if the zone did not exist the fighting, the noise and the numbers of people passed out on the street would increase drastically which would make it very difficult and frightening for me to go out in the evening.

Strongly agree	A stakeholder group	The special policy provides certain controls in areas which can be evidenced as higher in crime and disorder and ASB – particularly relating to alcohol and alcohol harms. The areas chosen are saturated with licensed premises and without a special policy then applications could continue to be received and granted without additional scrutiny. As stated in the document each case will be looked at on its merits if taken to a hearing, but the policy makes it clear what these considerations and restrictions are and that any applications will be contested by the relevant authorities so there cannot be allegations of favouritism or corruption.
Strongly agree	A CVS group	Because North Laine, within St Peters and North Laine Ward, has the highest number of alcohol-related incidents in the city.
Strongly agree	Not Answered	It is already at its limits so should be no more allowed
Tend to agree	Local resident	I agree with the proposal because there are often groups of drunk people in the area late at night.
Tend to agree	Local resident	<p>I believe that there should be a CIZ however I have strong reservations about the way it works.</p> <p>This statement appears as part of your background information for question 1. 'The Licensing Authority continues to consider that the number of licensed premises in the CIZ is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives' This bears no resemblance to the reality of what happens.</p> <p>I have been a close observer of the way Brighton &amp; Hove's Licensing Policy works for the last 15 years, as a resident writing letters about applications, representing the views of the North Laine Community Association at panels or as a member of the Licensing Strategy Meeting. I have decided that I no longer wish to take part in the 'Licensing process' as I believe the policy and the way the panel operates is fundamentally flawed and works against the interest of local residents. The Licensing policy ought to provide residents in the city centre with a degree of protection against the negative impact of the 2003 Licensing Act but it offers little protection. Instead the whole process seems to be designed to facilitate the granting of licences, so that despite being within the CIZ, the number of licensed premises (including new off-licences and pubs) in North Laine continues to rise.</p> <p>The CIZ is an area where the concentration of licensed premises is causing problems of crime and disorder and public nuisance. 'Cumulative' means 'increasing in amount with every addition'. If every additional licence adds incrementally to public nuisance and crime and disorder, why do we even consider the granting of additional licences?</p> <p>The policy itself is deliberately vague throughout to make it easy for Councillors at licensing hearings to grant applications. There is no definition of what constitutes 'exceptional circumstances' so anything can mean exceptional. The policy says what it might mean but does not give a clear definition i.e. must include community and police support. The matrix is what 'the licensing authority would like to see within its area.' Surely the matrix must be much more than a guide?</p> <p>The policy says in note 3 to 3.3 that Departure from the matrix is expected only in exceptional circumstances, yet exceptional circumstances are not defined.</p> <p>The policy says that an applicant should show that their application will have no negative Cumulative Impact. I have never seen an applicant demonstrate this. It might be said that it is difficult or impossible to demonstrate a double negative but if this clause 3.1.4 is upheld no application in the CIZ should be granted.</p> <p>At the beginning of a Licensing Panel hearing, everyone is told that 'each</p>

		<p>application will be given individual consideration on its merit.' Surely the point of the CIZ is that the cumulative impact is what is being considered, not any individual merits of the application.</p> <p>The way that Licensing Hearings are constituted and operate works against the interests of local residents. It is quite clear that the panel is looking to grant the application unless there is something very wrong about the application. There are certain councillors who are determined to ensure that every application that comes before them is passed. There are other councillors who do not seem to have a full understanding of what is in the Licensing Policy. The applicant is often asked what he/she would be prepared to accept in the way of conditions and soon a quite different application is under consideration which residents have had no opportunity to consider and make representations on. The result of this is that licences continue to be granted in North Laine.</p> <p>This statement appears as part of your background information for question 1. 'The Licensing Authority continues to consider that the number of licensed premises in the CIZ is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives'</p> <p>If this really is the case and is what is accepted by the Licensing regime why do licences continue to be granted in the CIZ? In 2005 there were about 30 licensed premises in North Laine, there are now 80, and residents continue to move away from the area because of the negative impact of the 2005 Act. Community cohesion is not as strong as it was before the Act. There are several reasons for this but one important factor has been the saturation of the area with licensed premises.</p> <p>Recently a whisky bar (really a pub) has been given a full licence - clearly contravening the matrix - and last year a premises in Church Street was given an off-licence. The CIA policy is not working. The whole Licensing Policy needs to be rewritten with clear precise language. How many times does the phrase 'may include' appear. Let us have a clear 'must include'. It is about time that the CIZ had no further bars or off-licences.</p> <p>The Licensing Policy as I have said exists to facilitate the granting of licences rather than judge applications against the licensing objectives. The policy must change as should the way licensing panels are run. What also needs to change is the composition of the Licensing Strategy Meeting which needs to be more representative of the interests of residents who for too long have been considered a nuisance and irrelevant to policy makers.</p>
Neither agree nor disagree	Local resident	I'm not sure that the number and location of premises is the issue. Other countries have late night café and bar cultures without the negative impact of alcohol -related crime. Lockdown has demonstrated that alcohol consumption can remain high even without pubs and bars, although the impact of this may well remain hidden behind closed doors. I think efforts should concentrate of changing the culture around drinking- including restricting alcohol promotion and offering cheaper non-alcoholic drinks and more alcohol-free venues.
Tend to disagree	Local resident	Unnecessarily restrictive
Strongly disagree	Local resident	The council try to restrict too much and they are out of touch
Don't know / not sure	Local resident	Does this include Providence Place, Elder Place, Ann Street and this part of London Road? It needs to as there are lots of drug and alcohol problems which seem to be getting worse.

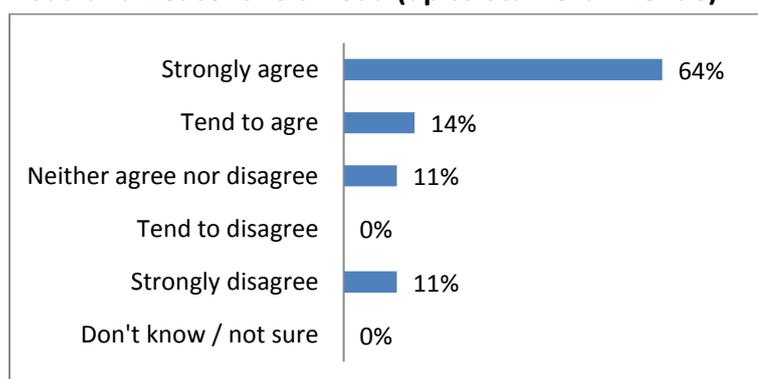
**Do you agree or disagree with the proposal to maintain the Special policy on cumulative impact and to maintain the current Cumulative Impact Zone?**

Strongly agree	Local resident	I think it is a very good idea. I want everyone to have a good time but that includes those people who live in the area and have to put up with the vomiting, fighting, litter and disturbance caused by those who have drunk too much.
Strongly agree	Local resident	I wish that the only accommodation available in the CIA was licensed hotels and B&Bs. The amount of places available to drink alcohol needs to be controlled, including holiday houses
Strongly agree	Local resident	I'm not clear on the difference between the CIA and the CIZ
Strongly agree	Local resident	It is felt that the CIA is constantly being ignored by the committee resulting in too many establishments.
Strongly agree	Local resident	Needs to be toughened up!
Strongly agree	Local resident	Please enforce the existing regulations more strictly, and please stop issuing more licences to sell alcohol. We have too many already.
Strongly agree	Local resident	See above. This needs close monitoring and the council have a difficult job balancing enterprise, business and the economy with the quality of life for residents. As a resident I enjoy the bustle of the city centre but late night alcohol fuelled issues are a nuisance
Strongly agree	Local resident	There needs to be stricter policing and enforcement on all licensed premises e.g. penalties of losing the licence/heavy fines/shorter hours if alcohol is found to be being sold to under-age drinkers, people who are already drunk etc. I also personally feel that ALL alcohol should be treated like cigarettes i.e. sold behind a counter. ID proof can be difficult as these can be forged - is there a way to check this?
Strongly agree	Local resident	Wish the measures were even more strict. There's a lot more to do in Brighton than just drink (to the point of oblivion), would be great to see more support for other forms of entertainment and retail experiences that give more back to the community spirit and encourage responsible tourism. I and many others share a fear that Brighton is increasingly showing off its worst side, not its best.
Strongly agree	A local CVS group	<p>It needs strengthening. There are too many divergences.</p> <p>The change which has had the greatest impact on the lives of North Laine residents has been the 2003 Licensing Act and the unintended consequences which have had a huge negative impact on the quality of our lives.</p> <p>Since the introduction of flexible drinking in 2005, our areas have seen an increase in anti-social behaviour, crime and disorder. Late night noise and disturbances are now routine in our areas with the police seemingly powerless and reluctant to do anything. Instead of changing our drinking culture, as the 2003 Act envisaged, the effect of flexible drinking has been to extend the negative impact of alcohol consumption into the early hours of the morning, in particular noise, anti-social behaviour and crime and disorder.</p> <p>The areas within the CIZ are the worst areas in Brighton for nearly all categories of crime. One quick look at the Public Health Framework for assessing Alcohol Licensing will show that these areas are top of all the main categories of crime. Despite this and despite these areas being within the CIZ the number of licences granted for our areas continues to climb. The CIZ is saturated with licensed premises and North Laine has seen an increase of licensed premises since 2005 of 350%.</p> <p>We would like to see the Licensing Policy strengthened. For applications in the CIZ there is supposed to be a presumption to refuse and the applicant is supposed to demonstrate that there will be no negative impact as a result of his application, yet we still see licences granted because there are so many caveats within the policy. We are told at panel hearings that every application should be treated on its own merits. This allows panels to</p>

		<p>ignore the requirement to demonstrate that there will be no negative impact, and grant applications.</p> <p>One unintended consequence of the 2003 Act is that the character of North Laine has changed. The proliferation of licensed premises and the increase in anti-social behaviour has resulted in many residents leaving this area of the city. The area used to be diverse in terms of age, outlook, ethnicity, occupation. We had families living alongside pensioners and young couples as well as students. The communities within the CIZ were living entities with thriving community associations but as residents moved to escape the anti-social behaviour, and crime and disorder, they have been replaced by HMOs, Party Houses, Air BnB which have exacerbated anti-social behaviour. The fabric of the community has been torn apart and all our community associations are struggling to retain community cohesion.</p> <p>It is our understanding that if a business with a licence closes, the building still retains its licence, therefore a new business can move in.</p> <p>The SoLP needs to take into account economic prosperity but it also needs to balance the impact on the local community. Too little attention has been paid in the past to the impact on local communities of the proliferation of alcohol premises. There is a very clear demonstrable link between the number of licensed premises in an area and the level of anti-social behaviour and crime and disorder. Granting more licensed premises will do nothing to foster community cohesion or provide greater community protection.</p> <p>We need to see a decline in crime and disorder as shown by the Public Health Framework for assessing Alcohol Licensing. Until we see a reduction in crime and disorder any review of the Licensing Policy should make it far more difficult to get licences.</p>
Strongly agree	A local business	Needs more consistent enforcement.
Strongly agree	A stakeholder group	Sussex Police are in favour of the new CIA. It clearly states the evidence that is used to support the continuation of a special policy and why that is required in a vibrant and busy city such as Brighton & Hove.
Strongly disagree	Local resident	Waste of time and money
Don't know / not sure	Local resident	Does this include Providence Place, Elder Place, Ann Street and this part of London Road? It needs to as there are lots of drug and alcohol problems which seem to be getting worse.

### 3. Special Stress Area (SSA)

**Do you agree or disagree with the proposal to extend the Special Stress Area (SSA) to cover Preston Road and Beaconsfield Road (up to Stanford Avenue)**

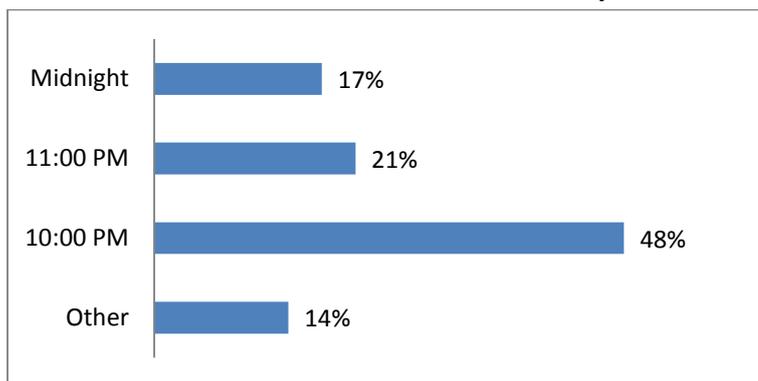


**Base: All residents who responded to the question (n=28)**

- The CVS and stakeholder respondents both 'strongly agree' with the proposals while the business respondent 'tended to agree' with the proposal.

<b>Do you agree or disagree with the proposal to extend the Special Stress Area (SSA) to cover Preston Road and Beaconsfield Road (up to Stanford Avenue)?</b>		
Strongly agree	Local resident	A good idea
Strongly agree	Local resident	As I'm not sure if the current one does, it MUST include Providence Place, Elder Place, Ann Street and this part of London Road? It needs to as there are lots of drug and alcohol problems which seem to be getting worse.
Strongly agree	Local resident	I live in this area and know it well I think this policy would be beneficial.
Strongly agree	Local resident	I think it is a good idea
Strongly agree	Local resident	In line with my comments about the city centre, it's also fairly unpleasant to walk around these areas even during the day, especially as a woman constantly being harassed or intimidated by drunk people. It's the same for many others.
Strongly agree	Local resident	It's a good idea and needs to be done.
Strongly agree	Local resident	It's a good idea as there is so much criminal activity going on in this extended area fuelled by alcohol. Brighton needs to be a safer place to live in and visit.
Strongly agree	Local resident	There are a large number of residential streets in these areas and the impact of the increasing amount of noise and anti-social behaviour needs to be recognised.
Strongly agree	Local resident	There are often major problems around the Preston Circus area fuelled by alcohol availability but at present there seems to be little control over the opening of new outlets. Making this part of the SSA would enable these problems to be addressed.
Strongly agree	Local resident	With the multiple properties being built for student accommodation in the area the numbers of residents in the area will increase dramatically which could increase the risk of anti-social activity.
Strongly agree	Local resident	Yes, I would prefer these roads to be included in the CIZ, along with London Road, to increase the chance of new licences being refused - even though I don't see much evidence of this happening even within the CIZ.
Strongly agree	A CVS group	If the extension is to protect the area, yes, but will it be enforced? There are still too many licences being granted because the get-out clause in the SoLP is "each application will be seen on its own merit".
Strongly agree	A stakeholder group	Sussex Police provided a lot of the data/evidence for this proposal and are strongly in favour. It is an arterial route out of the city where we have seen an increasing number of premises licence applications in recent years. It creates more of a buffer for the London Road area and focuses on concerns of local residents as well as crime and disorder patterns.
Tend to agree	Local resident	A largely residential/family area where alcohol related nuisance could be a problem.
Neither agree nor disagree	Local resident	Don't know what it's like there.
Strongly disagree	Local resident	Excessive restrictions on licences has a negative effect on businesses
Strongly disagree	Local resident	Pointless waste of time

**It is proposed to reduce the terminal times for alcohol to be sold in cafes to 11pm or 10pm in the “special stress area” and “other areas” of the matrix? What do you think is the appropriate terminal times for alcohol to be sold in cafes in the “special stress area” and “other areas” of the matrix?**



**Base: All residents who responded to the question (n=29)**

<b>Responses for 'other'</b>
9pm (3 responses)
11.00PM on Friday and Saturday seems reasonable
11pm
9pm if within 25metres of any residential property not connected to the cafe
Ideally 9pm so that people are moving on by 10pm
Ideally we'd prefer 6pm for cafes. Our problems stem from cafe bars, which should never have been included in the Matrix and has caused many alcohol concerns in North Laine.
We should have reduced hours when there are major events of 9 pm.

- The stakeholder respondent though 11pm was the appropriate terminal time, while the business respondent and the CVS respondent agreed with 10pm as the latest time.

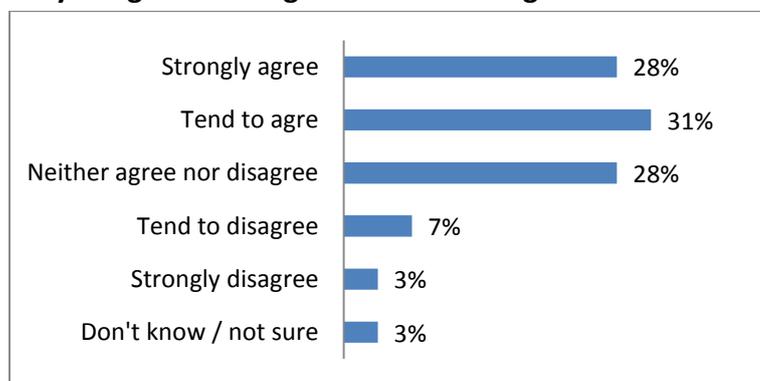
<b>Why do you consider your chosen time to be appropriate?</b>		
Midnight	Local resident	As I said earlier, I do not think restrictions work, we need to challenge the mindset / culture that intoxication is fun. I used to drink in pubs when they closed promptly at 11pm, people would line up drinks to consume. Restrictions on times and location in my opinion are sticking plaster response to a systemic problem that requires a cultural shift within our society.
Midnight	Local resident	During summer months & especially in warm weather this allows alcohol consumption to be spread across the area & range of businesses.
Midnight	Local resident	This would have no impact at all. The Police should Police bad behaviour and not have rules for people who are reasonable

11:00 PM	Local resident	10pm is draconian
11:00 PM	Local resident	Seems sensible as people will be working the next day so maybe midnight on Fridays and Saturdays.
11:00 PM	Local resident	This reflects the old licensing laws and there were not the extensive problems in those days that we experience now. Ending drinking at 11pm worked.
11:00 PM	A stakeholder group	Sussex Police have looked at the data around existing café bars for the previous SoLP review in 2018/19 and there is little police evidence linking higher crime rates to this type of premises. Having a time in line with pubs (who can have until 11pm in the SSA and other areas) seems sensible as appropriate conditions can be applied to ensure no vertical drinking and food availability and should prevent people just applying for a pub/vertical drinking to get later hours. There is always room for discussion with any applicant about their terminal hour and whether they would like to reduce that because of their style of operation e.g. they are a café who generally closes at 10pm during the consultation period. Sussex Police would not recommend a later terminal hour than 11pm e.g. midnight, as this is moving into more pub territory and the night time economy as opposed to a more relaxed seated environment.
10:00 PM	Local resident	Because I think it's an average time that most people would want to go to sleep in the week. The biggest issue in the area that I live in is drunk people arguing, causing damage to cars, bins and having very loud conversations or singing.
10:00 PM	Local resident	Because this might have a beneficial effect upon the amount of noise generated by cafe premises when they close for the night.
10:00 PM	Local resident	I think you also need to look at the opening hours. If I had my way it would be only from 11 a.m. and after that during daylight hours. Who needs to buy alcohol before 11 in the morning? From what I've seen beneath my bedroom window, it is drug addicts with their single cans at 7 a.m. However, I have to appreciate that others enjoy a drink with food - hence the 10 pm closing time.
10:00 PM	Local resident	It gives drinking up time to ensure that residents aren't as likely to suffer the effects of drunken behaviour and altercations when they are attempting to sleep past 11pm
10:00 PM	Local resident	It would mean that cafes would be operating as cafes and not tend to become drinking establishments. This should be reduced when major events such as Pride are occurring and also on Sundays when 9 pm should be sufficient. Opening times should be limited for cafes to start at noon.
10:00 PM	Local resident	Just looking at the statistics for violence of all sorts and criminal activity - it seems obvious.
10:00 PM	Local resident	Late night noise - people who have had a drink often make more noise and this will reduce the amount of drinking time. Less noise as they leave - hopefully.
10:00 PM	Local resident	Many people having alcohol in cafes are not eating and so they become intoxicated. Many of the cafes serve food during the day but stop serving food in the evening and only served drinks thus they become the same as pubs.
10:00 PM	Local resident	People should be done eating by then

10:00 PM	Local resident	Presumably these cafes are selling food and are not just drinking establishments. In that case most people will have ordered their food and drink by about 10pm and there is no need to serve alcohol after the meal has been consumed.
10:00 PM	Local resident	The less consumption, the better the behaviour
10:00 PM	Local resident	These establishments are cafes, they are not pubs and therefore the times to sell alcohol should be different.
10:00 PM	A local business	Particularly important in times of Covid that the close contact of people (including visitors) is kept under control.
10:00 PM	Not Answered	Stop drinkers coming out late and noisily into streets and waking us residents
Other	Local resident	9pm at the latest
Other	Local resident	Cafes should be 10pm unless they have residential accommodation above or within 25metres of the cafe and then it should be 9pm
Other	Local resident	Last orders at 9:00 still leaves plenty of drinking time and reduces noise as people exit restaurants and cafes.
Other	Local resident	the later the availability the later the issues and more problems arise
Other	A CVS group	Although we agree with 10pm as the latest time for closing, most cafes (NOT cafe bars) close by 6pm in North Laine. Most of their income is from breakfasts, brunches and lunches.

#### 4. The Marina

##### Do you agree or disagree with including the Marina into “Other areas” of the Matrix?



Base: All residents who responded to the question (n=29)

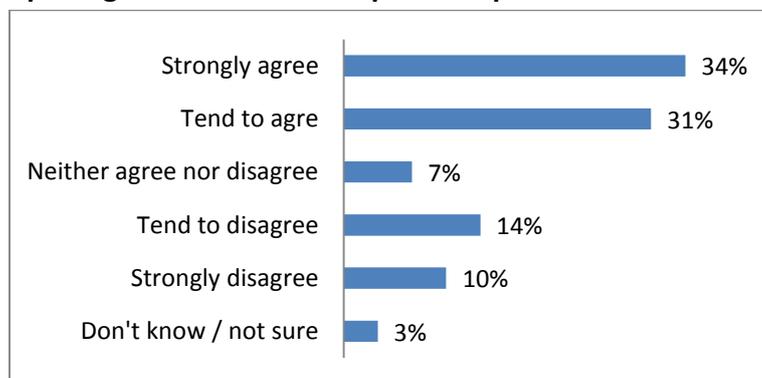
- The CVS and stakeholder respondents both ‘strongly agreed’ with including the Marina in the ‘other area’ of the Matrix, while the business respondent ‘tended to agree’.

Do you agree or disagree with including the Marina into “Other areas” of the Matrix?		
Strongly agree	Local resident	I think the governance of alcohol use/sales should be consistently enforced in all high density/high tourism areas throughout Brighton.
Strongly agree	Local resident	This is now a residential area (and no longer really a marina - sadly!). Therefore it should be treated the same way as other residential areas.

Strongly agree	A stakeholder group	Sussex Police believe this will allow better management of licensed premises in the Marina as there are currently few restrictions. Each case would be considered on its own merits and so this still allows applicants an opportunity to show why their application is unique and outside policy. The way the Marina is set up means there is currently massive residential expansion and applications are more likely to come in for restaurants/cafes and bars catering for day time and then evening trade.
Tend to agree	Local resident	Families and residents are impacted by late night noisy drinkers.
Tend to agree	Local resident	I feel that anywhere where there is high number of residential areas should be protected from antisocial behaviour.
Tend to agree	Local resident	I imagine that the increase in residential premises in the area makes it incumbent upon the Council to consider the impact of licensing upon the community. This includes provision of licensed premises for the community, as well as protection from nuisance.
Neither agree nor disagree	Local resident	Don't know what it's like there.
Neither agree nor disagree	Local resident	The Marina causes little issue to other areas of the City so including this in the Matrix would have little effect and could reduce the concerns for those in central areas.
Tend to disagree	Local resident	The Marina needs to be an attraction. There are homes there but the Marina isn't such a rowdy place.
Tend to disagree	Local resident	The marina should be mixed use

## 5. Shopping parades

**Do you agree or disagree that the terminal times for off licences in shopping parades should reflect opening hours of other shops in the parade?**



**Base: All residents who responded to the question (n=29)**

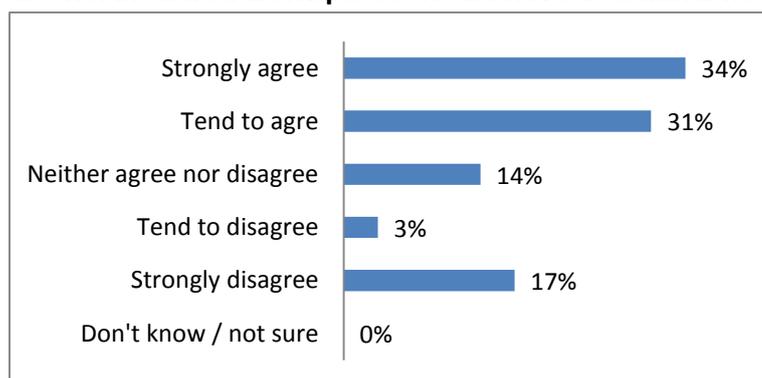
- The business respondent and the CVS respondent both 'strongly agree' terminal times for off licences in shopping parades should reflect the opening hours of other shops in a parade. The stakeholder respondent 'tended to disagree'.

<b>Do you agree or disagree that the terminal times for off licences in shopping parades should reflect opening hours of other shops in the parade?</b>		
Strongly agree	Local resident	Definitely restrict, can't even walk my dog at night due to the menacing behaviour around the four off-licenses in our immediate neighbourhood. No problem with them staying open for essential goods, but the effects of cheap alcohol is a serious issue here.

Strongly agree	Local resident	Living in an SSA, I was shocked to discover yesterday that one of the off-licences has a 24-HOUR LICENCE! This area is ranked No. 1 for alcohol and drug related problems with its appalling statistics for violence, anti-social behaviour etc.
Strongly agree	Local resident	Selling alcohol at later times just encourages street drinking and anti-social behaviour.
Strongly agree	Local resident	We in the North Laine have several outlets which run as off licences which operate to vary late. Restricting this would have a major effect on the availability of alcohol and street drinking in the evening.
Strongly agree	Local resident	Yes, they need quiet time to be cleaned.
Strongly agree	A CVS group	We agree that terminal times should reflect the times of other shops in parades.
Tend to agree	Local resident	Some shops are open 24 hours. Every off licence should be reviewed individually
Tend to disagree	Local resident	I do not think that off licenses should be closing at the times of other shops such as five or 6pm. I think the off licenses should close at about 10pm
Tend to disagree	Local resident	Most adults drink responsibly- or at least - do not engage in alcohol-fuelled crime.
Tend to disagree	A stakeholder group	Sussex Police believe that each case should be taken on its own merits taking into account the surrounding area and the needs of local residents. A continuation of the current matrix which says 11pm but earlier may be considered in residential areas would be the preferred Sussex Police position.
Strongly disagree	Local resident	Off licences should be open later to encourage people to drink at home rather than being loud and drunk on the way back from pubs. The only consideration that is at odds with this from my perspective is whether it actually encourages drinking in parks, public spaces and the beach later at night than if they closed earlier and also the off licences' preferences as people have lost revenue during COVID-19 lockdown so wouldn't want policies to impact residents or off licences disproportionately either way.

## 6. Shared work spaces

**Do you agree or disagree with the inclusion of “shared work spaces” into the notes of the matrix and the suggested paragraph and conditions? It is proposed to amend note 10 of the matrix to clarify that “Non-alcohol led category does not include “alcohol in shared workplaces”. It is recommended that sale of alcohol in shared workspaces should have a terminal hour of no later than 10pm.**



**Base: All residents who responded to the question (n=29)**

- The business and the stakeholder respondents both ‘tend to agree’ with the proposal while the CVS respondent ‘strongly disagrees’.

<b>Do you agree or disagree with the inclusion of “shared work spaces” into the notes of the matrix and the suggested paragraph and conditions?</b>		
<b>It is proposed to amend note 10 of the matrix to clarify that “Non-alcohol led category does not include “alcohol in shared workplaces”. It is recommended that sale of alcohol in shared workspaces should have a terminal hour of no later than 10pm.</b>		
Strongly agree	Local resident	Again - people who drink alcohol tend to be noisier and less inhibited often becoming less aware of the impact they have on other people. This is not appropriate where people have to work.
Strongly agree	Not Answered	Should not be sold in shared workspaces
Strongly agree	Local resident	The sale of alcohol should be restricted to much earlier times. Terminal time should be about 6 pm if granted. It is felt that alcohol should not be available for sale in shared work spaces.
Strongly agree	Local resident	There is absolutely no reason to be selling alcohol in shared work spaces. People are there to work, not to drink alcohol! Usually there are other outlets selling alcohol in the vicinity if people are unable to work without drinking alcohol at the same time.
Tend to agree	Local resident	Hopefully special events could apply for an extension on that terminal hour. The office xmas party ending at 10 seems a bit early.
Tend to agree	Local resident	I think a terminal time of 10pm is generally a good thing where the primary purpose of the premises is not the provision of alcohol. It allows these premises to close earlier, and allows customers/ clients/ workers to get home earlier and safely.
Neither agree nor disagree	Local resident	I can't visualise the scenario in this question.
Neither agree nor disagree	Local resident	I don't think shared workspaces are a real issue, they're professional spaces and people aren't all that likely to go crazy drinking in that environment any more than any office party. Equally, the management of these spaces won't really want them to get trashed, so there's incentive for it not to go crazy. Focus more on where the problems really lie.
Neither agree nor disagree	Local resident	I think that sale of alcohol in shared workspaces should have a terminal hour of no later than 6pm
Tend to agree	A stakeholder group	Sussex Police agree that this needs to be a note on the matrix to define what such spaces are and to set out expectations e.g. an on-site café where patrons are served and a distinct event space rather than a fridge where patrons/workers can help themselves whenever they fancy. Sussex Police Data doesn't show that police are being called to these spaces and therefore we have no strong evidence to support or disagree with a terminal hour of 10pm. Sussex Police have already had input in creating note 10 on the matrix with suggested conditions that applicants may wish to consider and welcome this definition that ‘alcohol in shared workspaces’ is a separate consideration to ‘non-alcohol led’ businesses.
Strongly disagree	Local resident	No more rules
Strongly disagree	Local resident	Typically when I have been a member of shared workspaces in London and NYC, there isn't a licence granted to buy alcohol within the workspaces. Instead, there is an events' licence for the workspace to serve alcohol at members' drinks events and it is allowed for members to buy and bring in their own alcohol to enjoy individually but not as a large gathering in respect to members bringing in alcohol themselves.

Strongly disagree	A CVS group	We are of the view that work places should NOT sell alcohol. While the Policy proposals state that there is no evidence to suggest that LAs have encountered issues with these licences, why grant licences in the first place? As it is quoted: "it is important to acknowledge the potential negative impact alcohol can have on the workplace and to individuals."
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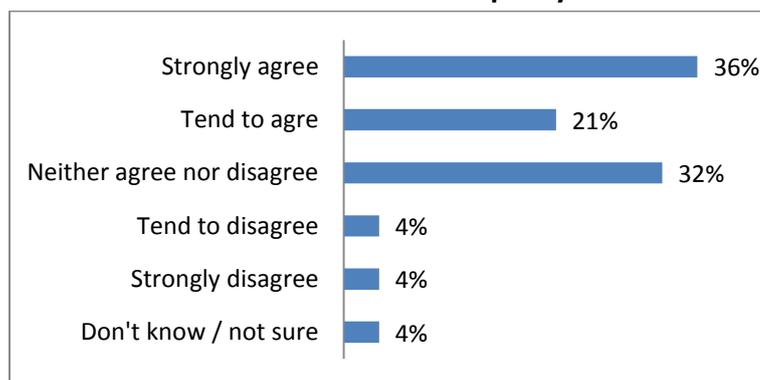
## 7. Alcohol delivery

<b>Do you have any comment to make about the suggested conditions for alcohol delivery in Appendix A of the draft Policy?</b>	
Local resident	Alcohol delivery isn't an essential service. Bin it. While it may be convenient for a party, it's also convenient for those who may be hiding their alcoholism at home, and open to abuse by underage people. The simple fact is that if people want their alcohol, they'll find a way. Why enable it further with this level of convenience. We also have enough issues with delivery drivers as it is, let's call time on this please.
Local resident	Alcohol restrictions should be extended as this is the main cause of criminal activity and anti-social behaviour in the city
Local resident	Allowing deliveries of alcohol into the CIZ is a way of getting round the Licensing policy. There have been instances of restaurants that are within the CIZ withdrawing their application because they can use an outlet outside the CIZ to deliver to within the CIZ. Residents have raised this issue before but their concerns have been ignored. If the Licensing authority is serious about the CIZ then it should prohibit deliveries into the CIZ.
Local resident	Appendix A reads great, but will be almost impossible to enforce and monitor. There should be no alcohol delivery after 5pm. I live in North Lane and we have terrible problems with delivery motorcycles ignoring one way streets, driving along pavements and driving along pavements. These bikes are also noisy and polluting. If they were only collecting and delivering food the amount of bikes coming here would be drastically reduced
Local resident	Companies such as Deliveroo and the like should not be used just to order alcohol to people's front doors. By doing this they are effectively circumventing the rules on alcohol provision prevailing under other policies. This loophole needs to be plugged.
Local resident	Do not regulate this
Local resident	I don't think there should be a food requirement if it's only being delivered to someone's home. Everything else seems reasonable.
Local resident	I have read them and I agree with the suggested conditions but I worry that the delivery people will find the rules difficult to enforce
Local resident	It would be good to know that there will be surprise "spot checks" by the Police and Licensing Authority to ensure that these conditions are being met.
Local resident	People shouldn't be restricted in their own homes
Local resident	Seems solid
Local resident	So much paperwork - people won't adhere. Where money is at stake, rules get flouted. What this country needs to regain is respect for neighbours. Respect for each other. Respect for authority. Respect from authority for the rights of individuals.
Local resident	Sounds like a good idea.
Local resident	There should be very limited availability of alcohol delivered and this should be limited to where this is with a food order such as normal drinking with a meal. I am not sure whether the wording regarding this is strong enough. It should be limited to beers and wine and also limited in quantity. There should be penalties where alcohol is delivered to premises such as parks.

Local resident	This will be virtually impossible to enforce. And who is going to enforce this? Is the plan that establishment will be required to provide proof?  This is wide open to abuse.
Local resident	When did it become possible to order alcohol with takeaway food? This seems to have happened by stealth. I knew it was happening but couldn't understand how it was possible. I think your provisions, reasonable as they are, simply seek to regularise an irregular activity.
A CVS group	We welcome additional paragraphs to address the concerns around the delivery of alcohol off the premises as well as a number of conditions. What we don't welcome is the very fact that takeaway alcohol can take place from licensed premises. This is a licensing loophole.
A stakeholder group	Sussex Police are in agreement with these suggested conditions as they were put forward by Sussex Police from a selection of conditions that have been used on previous licence applications.
Not Answered	Seems a good proposal

## 8. Shadow licenses

### Do you agree or disagree with the inclusion of the guidance paragraphs and suggested conditions for shadow licences in 3.10 of the draft policy?



Base: All residents who responded to the question (n=28)

- The CVS respondent and the stakeholder respondent both 'strongly agree' with the inclusion of the guidance paragraphs and suggested conditions for shadow licences while the business respondent 'neither agreed nor disagreed'

Do you agree or disagree with the inclusion of the guidance paragraphs and suggested conditions for shadow licences in 3.10 of the draft policy?		
Strongly agree	Local resident	I agree with the concerns of the licensing authority.
Strongly agree	Local resident	I have read the paragraph and the conditions seem to be very sensible and will remove a loop hole in the licensing scheme.
Strongly agree	A stakeholder group	Sussex Police welcome the inclusion of these paragraphs as Shadow Licences are something we have seen an increase in applications for in the last 3 years. A number of the suggested conditions came from Sussex Police and so we strongly agree with the proposal.
Strongly agree	Local resident	This has been another loophole that needs to be plugged.
Strongly agree	Local resident	This is a good move as, as things currently stand, it is wide open to abuse.
Tend to agree	Local resident	Is this easy to be abused?

Neither agree nor disagree	Local resident	From what I understand, this is purely to protect the viability of an existing premises if a tenant goes awol on a licensed establishment. It's purely a legal issue, not a community one? That said, any licensing - even one such as this to protect a business - should be subject to review of some sort.
Neither agree nor disagree	A local business	Some small general stores with off-licences have very long hours, which could be reduced
Tend to disagree	Local resident	If a licence is revoked there will be a good reason for it, and the local community will not welcome the immediate resurrection of a licence straight after whatever misdemeanour caused the revocation.
Not Answered	Local resident	The issue here is that the licence relates to the premise rather than previously the applicant. It is felt that there should be further steps from any applicant to ensure that they are suitable but unsure whether the present legislation would allow this.

## 9. Final comments

<b>Do you have any comments to make about any other aspects of the draft policy?</b>
<p>3.1 refers to 'need'. I have seen licences granted because the applicant sold his application as providing something new for the area. This is 'need' and not 'exceptional circumstances' and councillors need to be trained to comply with his requirement.</p> <p>3.1.6 Surely the applicant must be required to demonstrate that there will be no negative impact. The language used throughout the policy is too 'woolly'. It needs to be much firmer and clearer, and not give councillors on the panel the licence to grant anything they want.</p>
<p>Brighton clearly needs tourism and drinking has always been a large part of Brighton culture. However, the level of intoxication and crime is disproportionate so in the absence of being able to police the amount of drinking that occurs here, just dial down the number of new licenses, hold club owners in particular more accountable, and please provide more services so this doesn't become a completely unbearable place to live. Seriously, I dread leaving the house most days because of the antisocial behaviour... Thank you for taking this seriously and for giving us the chance to comment.</p>
<p>I disagree with the general increase in restrictions, Brighton's night time economy is a vital part of the city's vibrancy. I would prefer a considered campaign to encourage responsible drinking and drinking with food.</p>
<p>I don't have time to read the draft policy in full, my concerns are around the culture of drugs / drinking in this city. Public health messages are undermined by events such as cider and Prosecco festival, the distribution of alcohol in the streets during Pride etc, the selling / provision of alcohol and parents' evenings / school plays. I feel the city should pay more attention to offering alternatives to drinking rather than attempting to curb the obvious current determination to drink amongst a significant percentage of the population.</p>
<p>Often there is little policing in the North Laine area to discourage antisocial and aggressive behaviour on its pedestrian only streets with a retail / residential mix. Due to the listed buildings, properties are single glazed and there is regularly loud, drunken and antisocial behaviour on these streets. Lockdown was blissfully quiet and it was possible to sleep but am back to not being able to sleep until 2am at the earliest most nights due to noise again now so would appreciate this being taken into consideration when making decisions.</p>
<p>Only that, please, let the rules be strongly enforced with heavy and swift penalties if conditions are breached.</p>
<p>Please do SOMETHING to cut down alcohol sales in the North Laine!</p>
<p>Please enforce the conditions of the licence much more effectively, and publicise them.</p>

Policies need to be upheld and enforced. Unfortunately, my experience in North Laine has been that licenses are continually granted, irrespective of the CIZ and the Matrix.

Sussex Police welcome and support the proposals and further clarification that these changes bring to the revised Statement of Licensing Policy. Many of the questions cover emerging issues that are being seen in the city of Brighton & Hove and provide clear guidance for all users of the Policy and the Licensing Act 2003.

The combination of Covid with existing alcohol related problems need more attention

The idea of selling alcohol from a safe kiosk/space (like cigarettes) and manned by an over-25 is a good one. Last week a group of 9 drug addicts settled under my bedroom window in Providence Place - they were there from 6.15 a.m. to 8.30 a.m. and the men went off and came back with single cans of alcohol. There is no point aiming at just clubs, pubs and off-licences if one doesn't tackle the cheap and available booze in the supermarkets - especially considering their early and late opening hours.

We are aware that applicants can make adjustments to the application up to 24hrs before the hearing. If no adjustments have been made, the Panel should consider what is before them and make a decision to grant or refuse solely on that basis.

What authority does the Panel have to negotiate, particularly early on at a Hearing? We believe the objectors are at a disadvantage if the application is altered on the day.

With regard to the Licensing Register, again residents feel that we are disadvantaged. Residents have to judge the application on the short descriptions provided. Can the objectors have sight of the complete application available to EHL and Police? This would assist us in our representations.

With regard to TENs, we request that times and details of the event are provided on the website. At the moment we have no idea if there are particular late night problems in North Laine refer to one particular TEN.

We request that site visits should be taken by the Panel before Hearings which would save a lot of time at Hearings when time is taken by the Panel to determine where a premises is, the square footage, and how many covers there are. Many café/bars and restaurants that have been granted during the past few years have no toilet facilities for customers. One premises is a garage with no windows. Some applicants have given details of their premises which have not been correct and residents have to listen to these misrepresentations.

We have read the Hearing Regulations but can find no details of a procedure for negotiating, or bartering, at Hearings. However, we note that Insofar as these Regulations do not make provision for procedures for and at hearings, section 9 of the Act provides that the authority can determine its own procedure. We believe residents are disadvantaged by the procedures endorsed by Brighton and Hove Council and ask that the SolP and hearing procedures are strengthened, particularly with regard to CIZs.

Residents from other areas of the CIZ have reported to us that applicants come to the panels 'lawyered up' with changes and conditions which bamboozle the Panel. It seems the Council just don't care about the city's heritage or the people who live and work in it.

