

Agent Statement in Support of the Application – King Street Supermarket, 84 King Street, Cambridge CB1 1LN

Presented by: Mahir Kilic, Licensing Agent

Hearing Date: 20 May 2025

To: Cambridge City Council Licensing Sub-Committee

Introduction

I am representing the applicant in support of a new premises licence application submitted under Section 17 of the Licensing Act 2003 for the above premises. The application seeks authorisation for the retail sale of alcohol for consumption off the premises from **07:00 to 00:00, Monday to Sunday**. We recognise the location within the Cambridge City Centre Cumulative Impact Area (CIA), and the representations received from the Police and other parties have been fully considered.

Addressing the Cumulative Impact Policy

This application has been carefully developed to address the potential concerns related to cumulative impact. While the premises falls within a CIA, it is important to distinguish its nature and proposed operation from high-risk venues. This is a small, responsibly managed grocery store seeking modest off-sales of alcohol. It is not intended to attract high volumes of late-night activity, nor to become a destination for problematic drinking.

Dialogue with Cambridgeshire Constabulary

We appreciate the constructive engagement with the Police Licensing Officer. While no final agreement was reached, we would like to highlight our extensive willingness to **adopt conditions** that meaningfully promote the four licensing objectives.

The Police proposed restricted alcohol sales hours of 11:00 to 20:00 daily. We responded with a reasonable and proportionate counterproposal: maintaining these hours during winter months but extending the hours to **21:00 during the summer (April to September)**. This reflects both increased public activity and natural surveillance during extended daylight hours, which in our view does not add to cumulative impact and aligns with a safe, seasonal retail operation.

Comprehensive Conditions Offered

To address the concerns of crime, disorder, and public nuisance, the applicant offers the following robust conditions:

- **Challenge 25** with EPOS till prompts.
- **CCTV coverage** including the alcohol section.
- **No self-service of spirits**, and restricted placement of wine/beer near counter under supervision.
- **No single cans** and **ABV restriction** above 5.5% (with minor cultural exceptions e.g., Guinness Foreign).
- **Staff presence on the shop floor at all times.**
- **Training in conflict management**, incident log, refusal register, and staff authorisation records.
- **Membership of CAMBAC** (if in operation).

These exceed the baseline expectations for off-licence premises and are tailored specifically to this setting.

Nature of the Premises

This is not a convenience store with a dominant alcohol focus. Alcohol will represent a **minor component** of the product offering. Spirits will not be self-served and high-strength products are voluntarily restricted. This is **not a budget/high-volume alcohol outlet**, and the client has a vested interest in maintaining a responsible, community-facing operation.

Policy Considerations

We acknowledge the Council's Statement of Licensing Policy and Section 5 relating to cumulative impact. However, we respectfully submit that:

- The **rebuttable presumption** should not apply rigidly where conditions and context mitigate the cumulative risk.
 - No responsible authority (other than Police) objected to the application.
 - A **seasonal restriction** on hours represents a **measured and innovative compromise**, supporting economic vitality while upholding licensing objectives.
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Addressing the Cumulative Impact Policy

While we respect the intent behind the CIA, it's crucial to consider the broader context:

- **Economic Considerations:** The UK is currently facing significant economic challenges, with small businesses disproportionately affected. Supporting independent retailers is vital for community resilience and economic recovery.
- **Equity in Licensing:** Within the CIA, large chain retailers such as Tesco and Sainsbury's have been granted licences to sell alcohol. Denying similar opportunities to small, independent businesses like King Street Supermarket could inadvertently

favor larger corporations, undermining local entrepreneurship and diversity in the retail sector.

- **Local Availability:** An analysis of the local area reveals a limited number of off-licence premises in close proximity to 84 King Street. According to Appendix 5 of the licensing report, the nearest five off-licence establishments are:
 1. **Tesco Express** – Approximately 0.2 miles away
 2. **Sainsbury's Local** – Approximately 0.3 miles away
 3. **Cambridge Wine Merchants** – Approximately 0.4 miles away
 4. **Bacchanalia** – Approximately 0.5 miles away
 5. **Thirsty Cambridge** – Approximately 0.6 miles away

This distribution indicates that there are relatively few off-licence options within walking distance of the proposed premises, suggesting that granting this licence would not contribute significantly to cumulative impact concerns.

Comparative Insights from Other Boroughs

It's noteworthy that several UK boroughs have re-evaluated their cumulative impact policies:

These examples illustrate a shift towards more flexible and evidence-based approaches to licensing, balancing the need for regulation with support for local businesses.

Empowering Women in Business

It is also important to highlight that both the Designated Premises Supervisor (DPS) and the Premises Licence Holder are women. Granting this licence would not only enable a small independent business to thrive but would also directly support the return to work and professional advancement of two local women.

In a retail and licensing landscape still largely dominated by larger corporate entities and male leadership, supporting female entrepreneurship and employment is an essential step toward achieving greater gender equity. The Licensing Act 2003 does not preclude the Committee from considering broader community benefits, and this is one such opportunity to promote social value. Helping women-led businesses to establish and grow aligns with wider public interest goals, including inclusive economic development and community representation.

Conclusion

The applicant has taken a constructive, proactive, and transparent approach. We are not seeking unrestricted trading but rather a carefully conditioned and community-compatible operation.

We ask the Sub-Committee to consider granting the application with the proposed hours and the offered conditions, thereby balancing community concerns with business viability.

We are, of course, open to further dialogue and to any reasonable adjustments the Sub-Committee may deem necessary.