

REBUTTAL STATEMENT TO THE CAMBRIDGE CITY CENTRE CUMULATIVE IMPACT ASSESSMENT

IN SUPPORT OF A NEW PREMISES LICENCE APPLICATION FOR

KING STREET SUPERMARKET, 84 KING STREET, CAMBRIDGE CB1 1LN

This statement is submitted in support of a new premises licence application for King Street Supermarket, 84 King Street, Cambridge. The applicant fully acknowledges that the premises is situated within the Cambridge City Centre Cumulative Impact Area, and therefore the rebuttable presumption applies. This statement explains, in detail, how the operation of the premises will not add to cumulative impact and how substantial changes have been made since the previous application was refused.

Following the Sub-Committee's decision in May 2025, the applicant undertook a comprehensive review of every concern raised by Members, the police and local residents. The new application incorporates significant operational, structural and managerial improvements, each specifically designed to address the issues highlighted during the previous hearing. As a result, the business now presents as a low-risk, tightly controlled grocery store with a limited and carefully managed alcohol offer.

A new CCTV system will provide full coverage of the shop interior, blind spots, and the external frontage, with live monitoring available at all times. These upgrades directly respond to the Committee's concerns regarding visibility and crime prevention.

The applicant has implemented a structured training programme covering age-restricted sales, conflict management, incident reporting and refusal procedures. Training is refreshed every six months and recorded in a log available for inspection. This ensures a competent, consistent approach to dealing with challenging situations and customers, including those involved in street drinking.

The alcohol offer has been fundamentally revised. Spirits will be kept behind the counter in locked display, while all other alcohol will be contained in a small, highly visible area closest to the till. A lockable alcohol fridge has been installed. The range of alcohol has been deliberately restricted: there will be no single cans, no beers, lagers or ciders above 5.5% ABV, and no miniatures or small high-strength bottles. These measures go beyond the restrictions imposed on many existing off-licences in the area and directly address the police's concerns regarding the purchasing habits of the local street community.

The applicant has voluntarily proposed operating hours from 11:00 to 20:00 each day, matching the hours suggested by the police during the previous consultation. This removes any argument that the premises might contribute to late-evening or night-time disorder. The applicant no longer seeks any seasonal extensions and accepts that the ASB concerns identified in the previous hearing exist throughout the day. Operating strictly within these hours ensures that the premises cannot add to late-night alcohol availability and cannot reasonably be connected to the type of behaviours occurring in the early hours of the morning.

The business has also committed to joining CAMBAC immediately upon the grant of the licence. A comprehensive incident log, refusal log, staff authorisation register and training log will be maintained and available for inspection. Staff will be present on the shop floor at all times the premises is open, and a door chime alert will notify staff of all customer entries and exits. These measures create a robust framework for early intervention, crime prevention and operational transparency.

The police evidence presented at the previous hearing centred heavily on long-standing ASB patterns in Christ's Pieces, King Street and the alleyways around Manor Place and Malcolm Place. While the applicant recognises that these issues exist, there remains no evidence linking them to this premises, nor is there any evidence that the controlled sale of alcohol from this small grocery store would exacerbate them. The conditions offered, combined with restricted hours and a limited alcohol range, ensure that the premises cannot become a source of supply for the local street drinking community. Indeed, the operational model is consistent with harm reduction: stronger controls, lower-strength products, no single cans and high visibility all work to deter problematic customers rather than attract them.

The Sub-Committee previously expressed concern that the applicant's business model was heavily alcohol-driven, partly due to an application for a Temporary Event Notice linked to a beer festival. The applicant has reflected on this and will not seek any TENs related to alcohol-led events in the future. The purpose of this licence is now clearly and exclusively tied to providing a modest, responsibly managed grocery store with a small, strictly controlled alcohol selection.

The overall approach of this new application is to reduce risk at every layer of operation. The premises now benefits from improved visibility, enhanced staff capability, superior CCTV, stricter product controls, a reduced alcohol footprint and carefully limited hours. These changes directly address each of the concerns raised in the Sub-Committee's decision, particularly those regarding visibility, supervision, staff experience, advertising, community impact, alcohol range and security. When considered in combination, these measures create a premises that is significantly lower risk than several existing licensed premises in the same area.

For these reasons, the applicant submits that the presumption against granting a licence has now been successfully rebutted. The revised operating model demonstrates that this premises will not add to the cumulative impact of licensed premises in the City Centre and, through its enhanced controls and partnership commitments, may even contribute positively to the local area by reducing opportunities for crime and disorder. The application is proportionate, carefully tailored to its surroundings and fully aligned with the promotion of all four licensing objectives.

The Licensing Act 2003 requires decision makers to adopt an evidence-based, proportionate approach. The applicant has listened to the concerns raised previously and taken active steps to remedy each identified weakness. The strengthened operating schedule, restricted alcohol offer, robust conditions and enhanced management arrangements now provide a solid basis upon which the Sub-Committee can confidently grant the licence.

Proposed Licence Conditions:

Conditions

1. Alcohol shall only be displayed in the area behind the counter and shall not be available for customers to self-serve. Outside of licensable hours, alcohol shall not be on display.
2. Cider products shall not be stocked in containers greater than 1 litre in volume.
3. The premises will operate a Challenge 25 policy. The checkouts will be programmed to prompt the checkout assistant when an alcohol product is scanned at the till to follow the Challenge 25 policy.
4. Staff training shall include conflict management, and will be provided to give them the knowledge and confidence to deal with difficult situations and reduce crime and disorder at the premises.
5. A nominated person shall join and be an active member of the CAMBAC scheme. The condition is only binding whilst the CAMBAC scheme is in existence.

6. The entrance door shall be fitted with an audible alarm as to notify staff that the door has been opened.

7. At all times when the premises is open to the public a member of staff shall be on the shop floor.

8. No customers carrying opened bottles of alcoholic drink upon entry shall be admitted to premises at any time.

9. A written delegation of authority record shall be kept at the premises whereby non personal licence holders are authorised to make sales on behalf of a personal licence holder.

10. Staff Training

All staff involved in the sale of alcohol will receive:

- Documented induction training on age-restricted sales prior to any alcohol sales.
- Refresher training at six-month intervals.
- All training records will be kept on site and made available to the police or any authorised officer upon request.

11. Refusals Register

All staff will be trained to use a refusals log, detailing:

- Date and time of refused sale.
- Description of the attempted purchase.
- Name of the refusing staff member.
- This log will be made available for inspection by police or authorised officers.

12. Incident Log

An incident book will be maintained to record:

- All incidents of crime, disorder, or anti-social behaviour on or around the premises.
- Any occasion when the police are called to the premises.
- This will also be made available for inspection when requested.

13. Restriction on Self-Service

There will be no self-service of spirits, except for pre-mixed spirit-based drinks.

14. No Single Can Sales

There will be no sale of single cans of beer, lager, or cider.

15. ABV Restrictions

No beers, lagers, or ciders with an ABV greater than 5.5% will be sold.