

Our Ref: PC446 Licensing/King Street Supermarket

Licensing Officer
Cambridge City Council
4, Regent Street
Cambridge
CB2 1BY



28/11/2025

Dear Sir,

SUBJECT: Representation – King Street Supermarket, 84 King Street, Cambridge,
Cambridgeshire, CB1 1LN.

Please find attached Police representation relating to the Premises Licence application for the retail off-sale of alcohol. This representation has regard to licensing objectives for Prevention of Crime and Disorder, and Public Nuisance under Licensing Act 2003.

Yours Sincerely,

[Redacted Signature]

PC 446 Clare Metcalfe
(ProQual Level 4 Certificate for Police Alcohol Licensing Officers)
Operational Planning and Licensing Officer,
Partnerships and Operational Support Department,
Cambridgeshire Constabulary,
Hinchbrook Park,
Huntingdon,
PE29 6NP.

**THE LICENSING ACT 2003
REPRESENTATION FORM FOR "RESPONSIBLE AUTHORITY"**

Please delete as applicable: **POLICE**

Your name	PC446 Clare Metcalfe
Job Title	Cambridgeshire Constabulary Licensing Officer
Postal Address (inc post code)	Partnerships and Operational Support Department, Cambridgeshire Constabulary, Hinchingsbrooke Park, Huntingdon, PE29 6NP.
Contact telephone number:	n/a
Mobile Number:	
Email address:	

Name of Premises you are making a representation about:	King Street Supermarket.
Address of the premises you are making a representation about:	84 King Street Cambridge, CB1 1LN

This section is about your representation/s. They must relate to one or more of the Licensing Objectives. Please detail the evidence supporting your representation, (under the relevant headings) and the reason for your representation/s. *It is important that you detail all matters that you wish to be considered. (Use additional sheets if necessary). Regulations provide that in considering representations the authority may take into account documentary or other information produced by the party either before the hearing or, with the consent of all parties, at the hearing.*

Which licensing objective(s) does your representation relate to?	Please see below
The prevention of crime and disorder See below	Public safety N/A
The prevention of public nuisance See below	Protection Of Children from Harm N/A

Details of application

The application is for a new premises licence to permit the retail sale of alcohol at a convenience store King Street Supermarket, 84 King Street, Cambridge that opened on 16th April 2025. (Appendix 1 – Photo of premises).

The premises is located within the Market Ward Cumulative Impact Area, details of which can be found in the Cambridge City Council's Cumulative Impact Assessment [Statement of Licensing Policy: Cumulative Impact Assessment - Cambridge City Council](#)

Section 4.5 of Cambridge City Council's Cumulative Impact Assessment, states:

"the Licensing Authority considers that the number of licensed premises and club premises certificates within the areas specified in 4.1 is such that it is likely that granting further licenses or variations to licenses would be inconsistent with the authority's duty to promote the licensing objectives".

This is the second application seeking a premises licence at this location this year, the first application was submitted on 03rd April 2025. This application received a number of valid representations, including one from Cambridgeshire Constabulary, resulting in a Sub-Licensing Committee hearing on 20th May 2025. The police had significant concerns over the initial application.

The Member's decision was to refuse the Premises Licence.

Some of the concerns commented upon in the Record of Decision for the previous application have been addressed by the inclusion of robust conditions and reduced licensing hours. On this occasion the applicant has employed a new Licensing Agent to act on their behalf, and pre-application advice was sought from police.

Appendix 2 – Pre-application correspondence between agent and police licensing.

The Supply of Alcohol Hours being applied for are:

	Start	End
Monday – Sunday	11:00	20:00

I agree with Mr Daly comments that he submitted alongside the volunteered rebuttal conditions; that *"substantial changes have been made since the previous application was refused"*. However, despite these changes being made, they do not address a lot of the points highlighted in the Decision to Refuse the previous application.

To this end Cambridgeshire Constabulary object to this new application under the following Licensing objectives:

- The prevention of crime and disorder
- The prevention of public nuisance

It is also felt that for transparency purposes, the Sub-Committee Members are given to opportunity to decide on this application.

Concerns

Table below cites the Determination points for the refusal of previous application and the concerns that still remain outstanding:

Determination point not addressed	Outstanding Concern/Changes since previous application.
1. The premises opened 16 April 2025 and is in a Cumulative Impact Zone.	No change
2. The police maintain their opposition to the Application.	No change
3. There are seven licensed premises concentrated in a tight area in the King Street area.	No change

<p>These have the potential to impact on the promotion of the licensing objectives including the prevention of crime and disorder and prevention of public nuisance. The applicant initially gave evidence that there were only five such premises (Agenda 6, page 2) but accepted there were seven in the vicinity, and the closest was approximately 170 meters away. The Applicant additionally identified the following five establishments: Tesco Express – Approximately 0.2 miles away (322 meters); Sainsbury's Local – Approximately 0.3 miles away ((483 meters)); Cambridge Wine Merchants – Approximately 0.4 miles away; Bacchanalia – Approximately 0.5 miles away Thirsty Cambridge – Approximately 0.6 miles away. Members concluded this represents a significant concentration of off-licence options within walking distance of the proposed premises, which may contribute significantly to cumulative impact concerns.</p>	
<p>4. The premises backs onto Christ's Pieces, one of the City's premier green flag spaces. It includes a small playpark, used by mothers and their children, and tennis courts. The police stated that the proximity of Christ's Pieces to the Premises was a cause of concern as it suffers from alcohol related anti-social behaviour primarily caused by members of the street community. They frequent the area to congregate and drink alcohol. There is an additional problem of drug taking.</p>	<p>No change</p>
<p>5. The police identified in statements and in oral submissions at the hearing the following significant problems of crime and nuisance in the specific area covered by the CIA and made a direct link to the concentrated availability of alcohol as a contributing factor. The following crime statistics and information were provided:</p> <p>a. Alleyways along King Street have become 'no-go' areas. The Street community were camping out in, for example, Manor Place and Malcom Place. These included tight stairwells where the public struggled to get passed drinkers day and night.</p> <p>b. Recently an individual was stabbed close to the tennis court in Christ's Pieces and alcohol was a causative factor. This is very close to the premises.</p> <p>c. Aggressive and prolific shoplifting occurs in this area.</p> <p>d. Police Sergeant Kevin Misik gave evidence that staff in adjacent shops in the vicinity feel their life is blighted by street drinkers. They suffer significant racial abuse, threats of violence and fear going to work in the area. The police linked this directly to street drinkers and the prevalence of alcohol. He referred Members to a photo of the area with 4 or 5 Street drinkers setting up a 'camp' outside the premises close to the Applicant's.</p> <p>e. Support services confirm the passageways are routinely taken over by street drinkers.</p> <p>f. The police Street Outreach Team confirmed there are always people drinking in this area from early in the morning, blocking pathways and causing</p>	<p>Over recent months some 'designing out crime' work had been undertaken along King Street. A gate has been installed at the entrance to a covered alleyway between shops, meaning the problematic group of Street Drinkers who used to frequent that specific area have been displaced, and are no longer able to congregate there. They have currently dispersed to other areas of the city centre.</p> <p>h. lack of relevant retail experience with street drinkers would exacerbate problems.</p>

<p>ASB. The people they find in the area have substance misuse issues.</p> <p>g. The manager of the business against crime partnership has highlighted the same issues.</p> <p>h. The Applicant's Operating Schedule, the physical limitations of the premises, and the lack of relevant retail experience with street drinkers supported PS Misik in his view that, if granted, then the problems described would be exacerbated.</p>	
<p>7. Local residents also raised extensive complaints, including through ward representative, Councillor Bick. He explained that:</p> <p>a. This was a mixed residential street. It included Manor and Malcom Place. There is extensive social housing for vulnerable tenants. Families with young children live in the vicinity.</p> <p>b. A much higher set of problems concentrated in King Street than anywhere else in the ward.</p> <p>c. Residents' windows butt up against the pavement line. This leaves already vulnerable residents very exposed to ASB in the street close to the proposed premises.</p> <p>d. Residents attend ward surgeries and report they are intimidated by street drinkers.</p> <p>e. Advertising for alcohol on hoardings and windows in front of shop had been in place 2 or 3 months before the hearing.</p>	<p>No update available.</p>
<p>8. Members welcomed the Applicant's offer during the Hearing to alter proposed conditions by limiting the sale of alcohol between the hours of 11:00 – 20:00 hrs. However, Members did not accept the Applicant's linked submission that street drinkers created ASB, crime and nuisance mainly between 20:00 to 05:00 hrs and therefore it would be closed at during the period of impact. Members preferred police evidence that the street group congregated in the area and created problems at all times of day and night. The Applicant will add to supply of alcohol.</p>	<p>Reduced licensing hours offered from the outset on this application, (11:00 to 20:00 each day) but would still be open during times when street drinkers congregated in the area who created problems at all times of day and night. Applicant will still add to supply of alcohol.</p>
<p>9. When asked to compare the proposed application to other licensed premises Members noted that other Applicants had attempted to mitigate potential breaches of the licensing objectives by offering conditions which included dedicated security staff, to deal with aggressive beggars and shoplifting. The Applicant did not make such, or similar, proposals (although it had agreed not to sell alcohol in single cans or with a high ABV). The agent maintained that security staff would not be appropriate for this small premises. The size of shop made it difficult to have a cordoned area behind the counter for all alcohol sales to be controlled, although a lockable fridge would discourage some aggressive beggars shoplifting. Members had concerns with the degree of control that the Applicant could exert given the nature of problems. The Applicant did not dispute the description of the neighbourhood or incidents given by PS Misik.</p>	<p>No offer to employ dedicated security staff as was the case with some other licensed premises in the Market Ward CIA.</p> <p>The range of alcohol has been restricted: there will be no single cans, no beers, lagers or ciders above 5.5% ABV, and no miniatures or small high-strength bottles.</p> <p>There is a contradiction within the application, and confirmation is required to establish which of the below statements/conditions are being offered:</p> <ul style="list-style-type: none"> • 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, and,

	<ul style="list-style-type: none"> • There will be no self-service of spirits, except for pre-mixed spirit-based drinks. or. • Condition 1 as stated: 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. (The plan drawing would support the validity of this condition as the only alcohol display annotated on the plan is behind the counter).
<p>10. Members noted the proposal to use CCTV. The Applicant conceded that the CCTV monitors would not be viewable by staff in the rear of the shop. The Applicant conceded that the advertising in a front window and a display in another impeded staff from seeing what is going on outside the premises and, similarly, a large display of vape products inside obscures the view of the alcohol cabinet from the rear. The Applicant did not challenge the Members suggestion that they would need better visibility to prepare against crime prevention and shoplifting.</p>	<p>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.</p> <p>Would be useful to have confirmation of camera positions and positioning of monitor.</p> <p>Has not addressed the direct view to outside being obscured by the advertising sticker on the front window.</p>
<p>11. The Members listened carefully to the Applicant's suggestion that an off licence approximately 170 meters away had an older style licence and that such a licence would not include a condition limiting the ABV of 5.5% on individual cans / drinks sold would mean that street customers would choose that off-licence over the applicant's store, and therefore the Applicant would not add to the cumulative impact. The Members noted no real evidence was offered to support this contention. The Members felt that it was just as likely that street drinkers be attracted to the Applicant's store because of its closer and more convenient location to Christ's Pieces and the alleyways. Neither proposition had been satisfactorily evidenced, and it was not persuasive.</p>	<p>Premises convenient location to Christ's Pieces would still make the shop attractive to street drinkers who frequent this area.</p>
<p>12. Members questioned the retail experience of the proposed staff in the UK, this was limited given the challenging customer base and the sensitive location where ASB and shoplifting are real issues. The Applicant explained its intention was to employ family members only. Their background experiences included running a similar supermarket in Turkey, work as a nurse and work in accountancy.</p>	<p>Staff are still relatively inexperienced operators, who are new to both the retail trade and running a licensed premises in this country, and lack experience dealing with street drinkers.</p>
<p>13. Members understood that the Applicant wished to present itself as a community store, but the dominating images of alcohol, including a large Hennessey bottle in the shop window undermined that community emphasis. While the Applicant suggested it was targeting a different clientele, the advertising suggested that the street drinkers were at least an equal target. When Members probed the 'footfall' to ascertain the alternative profile suggested the Applicant merely indicated that low numbers were currently using the store.</p>	<p>Window sticker remains in place, though the word 'off-licence' has only been covered over. An attempt has been made to cover over the images of bottles of alcohol.</p>

<p>14. The Applicant conceded that it had already made extensive preparation and incurred costs associated with the sale of alcohol. Its application for a Temporary Events Notice to sell alcohol to coincide with a beer festival taking place a considerable distance from its King Street location concerned Members. It suggested the Applicant would be more focused on supplying alcohol than intimated by the Applicant's submissions that it was a small, responsibly managed grocery store in which alcohol represented a minor component. The Applicant's agent confirmed in his final submissions that the enterprise would not survive as a business unless it could sell alcohol. Members felt that it was fair to infer that the Applicant needed to drive sales of alcohol to survive, which added risk and alcoholic volume. Such a conclusion was not at odds with the Applicant's submission that alcohol would encourage people into the shop and allow cross-selling of other products.</p>	<p>Condition that No TENs related to alcohol-led events in the future will be sought.</p> <p>The previous agent confirmed in his final submissions that the enterprise would not survive as a business unless it could sell alcohol.</p> <p>Has anything changed from this statement? Isn't it still fair to infer that the applicant needs to drive sales of alcohol to survive? This will only put added pressure on operators/staff to sell alcohol and age restricted products to maximise income.</p>
<p>15. The Members were not persuaded that the applicant had shown that if granted, the application would not negatively add to the cumulative impacts experienced in the relevant cumulative impact area.</p>	<p>The inclusion of mitigating conditions and reduced licensing hours means the business presents a lower risk of negatively impacting the Cumulative Impact Area, but not as claimed by the agent "that the business now presents as a low-risk, tightly controlled grocery store with a limited and carefully managed alcohol offer".</p>
<p>16. Members noted Statutory Guidance at 14.29 that where there is evidence of a cumulative impact in crime statistics, or via oral and written testimony, on the promotion of the licensing objectives, which relates to the relevant problems identified in the area, the licensing authorities are able to draw upon this as evidence of cumulative impact. Guidance also directs the licensing authority to take account of complaints raised by local residents or residents' associations. The Members found the evidence satisfied the threshold.</p>	<p>No change</p>
<p>17. Where a successive number of applicants obtain alcohol licences within the area of a small CIA, and the police oppose the application suggesting that the area is densely concentrated with outlets selling alcohol, Members need to have a correspondingly sharp focus on the licensing objectives and whether the operating schedule is sufficient to uphold them.</p>	<p>No change</p>
<p>18. Members considered that it was open to them to grant the Application if it demonstrated through its operating schedule that it would not add to the cumulative impact being experienced. However, Members and the police questioned why, in all the circumstances, so little pre-application advice had been sought given the location in such a sensitive area. Members probed the Applicant's proposals for training staff and felt they were vague and unsatisfactory. There was no granular evidence as to how the proposed on-line course would equip the staff to deal successfully with challenging customer behaviour or theft.</p>	<p>The volunteered conditions are a positive step, and new agent has sought pre-application advice, and offered many additional conditions and reduced licensing hours. Appears to have used the findings of the previous hearing as a starting point for this application.</p>
<p>19. Members considered Cambridge City Council's Licensing Policy states that if the number of</p>	<p>No Change</p>

premises licences and/or club premises certificates in one or more parts of the area... is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives, as required by the Statutory Guidance at 14.26, it should reject the application.	
20. Members concluded that the Applicant did not show that the application, if granted, would not negatively add to the cumulative impacts experienced in the relevant cumulative impact area.	To be determined

As you can see in the pre-application correspondence with Mr Daly (Appendix 2) he mentioned the possible inclusion of a condition that would mean alcohol would only be sold alongside grocery products, however, it hasn't been included as a volunteered condition in this application.

The possible condition stated:

- Alcohol shall only be sold at the premises as ancillary to a grocery sale of at least equal or more than the cost of the alcohol. Grocery must include food items. For the purpose of the condition, liquids (soft drinks or otherwise), tobacco or nicotine products (cigarettes or vapes), non-perishable items (e.g. electronics, washing powder, baby milk or anything considered similar) or anything without a best before date shall not be considered a grocery item.

This is not a familiar condition, one which hasn't been used within Cambridgeshire before. For such a condition or similar condition, careful consideration would be required around its enforceability, and how feasible it would be for staff to adhere to.

Conclusion

Section 4.10 Cambridge City Council's Cumulative Impact Assessment, states:

"The onus is on the applicant to demonstrate to the responsible authorities the suitability of how their proposal will not add to the cumulative impact".

It is the opinion of Cambridgeshire Constabulary that the applicant has not sufficiently demonstrated on the operating schedule how they would not add to the cumulative impact on an area deemed sensitive to alcohol related crime and anti-social behaviour, it would be unhelpful if a premises licence was granted. Therefore, Cambridgeshire Police respectfully recommend that this application is refused.

Appendix 1 – Photo of premises.



Appendix 2 – Pre-application correspondence between agent and police licensing.

Good morning Oisin,

Thank you for your email, apologies for the delay in replying.

I appreciate your suggestion that the agreed conditions at the previous licensing hearing as the starting point, also the below mentioned enhanced conditions.

As PS Misik reiterated to the Committee during the licensing hearing the surrounding area where the shop is located is where there is an ongoing issue with street-drinkers causing alcohol related crime and disorder, and anti-social behaviour within the Market Ward CIA.

Also evidenced by Councillor Bick who also spoke at the hearing, detailing the alcohol issues within the area.

Upon receipt of any application, I will discuss them with the neighbourhood Sgt for that area and consider them under their own merits, and a further application on behalf of your client would be no different.

To assist you and your client you may find the attached publicly available Record of Determination for another recent off-licence application in the Market Ward.

Kind regards,

Clare

PC 446 Metcalfe (She/Her)

(ProQual Level 4 Certificate for Police Alcohol Licensing Officers)

Operational Planning and Licensing| Partnerships and Operational Support

Tel: Mobile: [REDACTED]

[Cambridgeshire Constabulary](#)

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From:	O	Daly	<[REDACTED]>
Sent:	07	October	2025 22:52
To:	Licensing	South	[REDACTED]
Subject:	Kings Street Supermarket		

Caution: Someone outside of BCH police sent you this e-mail. You must only click on links or open attachments if you are expecting this e-mail and you trust the sender.

Good Evening,

I've been asked by the owner of Kings Street Supermarket to consider whether an application for a premises licence would be viable considering the decision of the committee to refuse earlier this year.

I note that conditions were advanced during the consultation period and wonder, if these were considered a starting point, would there be any room for further consideration of reaching some form of agreement in principle on whether a premises licence could be granted with the CIZ.

Having read through the pack and submitted evidence from the Police side, it would appear that street drinking is the primary concern within the area. I'd be confident of training staff in how to

identify street drinkers, but, even with an enhanced training condition it might leave room for a bit of ambiguity.

Given it is in the CIZ, I was thinking of a condition which went along the lines of alcohol ancillary to food but in this case was alcohol ancillary to grocery shopping .

For example: Alcohol shall only be sold at the premises as ancillary to a grocery sale of at least equal or more than the cost of the alcohol. Grocery must include food items. For the purpose of the condition, liquids (soft drinks or otherwise), tobacco or nicotine products (cigarettes or vapes), non-perishable items (e.g. electronics, washing powder, baby milk or anything considered similar) or anything without a best before date shall not be considered a grocery item. Should a customer attempt to make a purchase of this type then then the licence holder shall refuse the sale rather than be forced to refund any items.

My thinking behind that is that with restricted ABV and multi pack sales (as an example a 4 pint multi pack of Heineken is RRP marked at £7.99) then street drinkers would be deterred by the fact they would be required to essentially double the cost of their purchase and the condition would price them out of using the premises.

Would be happy to discuss if possible?

Kind Regards,

Oisin Daly

Director

Tel: [REDACTED]

Absolute Licence Solutions Ltd
Co. No. 12211951

Appendix 3 – Delegation of responsibilities by the Chief Officer of Police



Licensing Act 2003

Delegation of responsibilities by the Chief Officer of Police

In accordance with the provisions of the Licensing Act 2003 I hereby delegate authority to Cambridgeshire Constabulary Licensing Officers to develop policies and procedures and to exercise all powers vested in the Chief Constable of Cambridgeshire Constabulary. Such delegation to include the power to delegate specific tasks to licensing Constables and support staff.

This delegation shall remain in force unless otherwise notified.

Signed



Simon Megicks
Chief Constable
Cambridgeshire Constabulary
29 September 2025