

Public Document Pack



**Service Director – Legal, Governance and
Commissioning**

Samantha Lawton

Governance and Commissioning

PO Box 1720

Huddersfield

HD1 9EL

Tel: 01484 221000

Please ask for: Jenny Bryce-Chan

Email: jenny.bryce-chan@kirklees.gov.uk

Monday 13 July 2026

Notice of Meeting

Dear Member

Licensing Panel

The **Licensing Panel** will meet in the **Council Chamber - Town Hall, Huddersfield** at **9.30 am** on **Tuesday 21 July 2026**.

This meeting will be live webcast. To access the webcast please go to the Council's website at the time of the meeting and follow the instructions on the page.

The items which will be discussed are described in the agenda and there are reports attached which give more details.

A handwritten signature in black ink, appearing to read "S Lawton".

Samantha Lawton

Service Director – Legal, Governance and Commissioning

Kirklees Council advocates openness and transparency as part of its democratic processes. Anyone wishing to record (film or audio) the public parts of the meeting should inform the Chair/Clerk of their intentions prior to the meeting.

The Licensing Panel members are:-

Member

Councillor Michael Howard

Councillor Akhtar Kasia

Councillor David Ridgway

Agenda

Reports or Explanatory Notes Attached

Pages

1: Membership of the Panel

To receive apologies for absence from those Members who are unable to attend the meeting.

2: Minutes of Previous Meeting

1 - 2

To approve the Minutes of the meeting of the Panel held on the 23rd April 2026.

3: Declaration of Interests

3 - 4

Members will be asked to say if there are any items on the Agenda in which they have any disclosable pecuniary interests or any other interests, which may prevent them from participating in any discussion of the items or participating in any vote upon the items.

4: Admission of the Public

Most agenda items take place in public. This only changes where there is a need to consider exempt information, as contained at Schedule 12A of the Local Government Act 1972. You will be informed at this point which items are to be recommended for exclusion and to be resolved by the Panel.

5: Deputations/Petitions

The Panel will receive any petitions and/or deputations from members of the public. A deputation is where up to five people can attend the meeting and make a presentation on some particular issue of concern. A member of the public can also submit a petition at the meeting relating to a matter on which the body has powers and responsibilities.

In accordance with Council Procedure Rule 10, Members of the

Public must submit a deputation in writing, at least three clear working days in advance of the meeting and shall subsequently be notified if the deputation shall be heard. A maximum of four deputations shall be heard at any one meeting.

6: Public Question Time

To receive any public questions.

In accordance with Council Procedure Rule 11, the period for the asking and answering of public questions shall not exceed 15 minutes.

Any questions must be submitted in writing at least three clear working days in advance of the meeting.

7: Licensing Act 2003 - Application for the Grant of a Premises Licence - Shop & Go, 21 Lord Street, Huddersfield, HD1 1QA

5 - 82

To consider the Licensing application at 9:30am.

Contact – Rox Javaid, Licensing Officer – 01484 221000.

Contact Officer: Jenny Bryce-Chan

KIRKLEES COUNCIL

LICENSING PANEL

Thursday 23rd April 2026

Present: Councillor Eric Firth (Chair)
Councillor Zarina Amin
Councillor Alex Vickers

In attendance: Tahir Hanif, Senior Legal Officer
Steve Mycroft, Licensing Officer
Mike Skelton, Senior Licensing Officer
Richard Woodhead, West Yorkshire Police

68 Membership of the Panel
No apologies were received.

69 Minutes of Previous Meeting
RESOLVED - That the minutes of the meeting held on the 17th March 2026 be approved as a correct record.

70 Declaration of Interests
No interests were declared.

71 Admission of the Public
It was noted that the agenda item relating to agenda item 7 (Minute No.74 refers) contained exempt information by virtue of paragraph 1 (information relating to an individual) of Part 1 of Schedule 12A of the Local Government Act 1972.

72 Deputations/Petitions
No deputations or petitions were received.

73 Exclusion of the Public
RESOLVED – That acting under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involved the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act, as specifically stated in the undermentioned minute.

74 Licensing Act 2003 - Review of a Personal Licence
The Panel considered a report which outlined an application for the Review of a Personal Licence.

West Yorkshire Police attended the hearing and presented their case in support of the Review, which sought revocation. West Yorkshire Police advised the Panel that

Licensing Panel - 23 April 2026

they had become aware that the Personal Licence Holder had been convicted of a criminal offence that had not been disclosed to the relevant authorities.

The Licence Holder was not in attendance at the hearing, did not provide a written response and had not engaged with Licensing Officers.

Having considered all the information, and in reaching its decision, the Panel had due regard to the provisions of the Licensing Act 2003, the statutory guidance issued under Section 182 of the Act, the Councils Statement of Licensing Policy and the relevant provisions of the Human Rights Act.

The Panel therefore determined that:

The Licence Holder was convicted of a relevant offence within the meaning of Schedule 4 of the Licensing Act 2003, namely a serious offence relating to drugs.

The Panel placed significant weight on the serious nature of the offence, the intentional and organised elements of criminal conduct, and the scale and potential harm associated with the offence which was reflected in the custodial sentence imposed.

The Panel concluded that conduct of such nature was fundamentally incompatible with the responsibilities and expectations placed upon a Personal Licence Holder who occupied a position of responsibility and trust in relation to the control and sale of alcohol.

The Panel noted the lack of engagement from the Licence Holder, together with their failure to notify the Magistrates' Court that they held a Personal Licence, and to inform the Licensing Authority of their conviction. In light of this, the Panel determined that revocation was a necessary and proportionate step to promote the licensing objectives, in particular the Prevention of Crime and Disorder and the Protection of Public Safety.

RESOLVED - that the application for the review of a Personal Licence, which sought revocation, was upheld and that the Personal Licence be revoked.

KIRKLEES COUNCIL				
COUNCIL/CABINET/COMMITTEE MEETINGS ETC				
DECLARATION OF INTERESTS				
Licensing Panel				
Name of Councillor				
Item in which you have an interest	Type of interest (eg a disclosable pecuniary interest or an "Other Interest")	Does the nature of the interest require you to withdraw from the meeting while the item in which you have an interest is under consideration? [Y/N]	Brief description of your interest	

Signed: Dated:

NOTES

Disclosable Pecuniary Interests

If you have any of the following pecuniary interests, they are your disclosable pecuniary interests under the new national rules. Any reference to spouse or civil partner includes any person with whom you are living as husband or wife, or as if they were your civil partner.

Any employment, office, trade, profession or vocation carried on for profit or gain, which you, or your spouse or civil partner, undertakes.

Any payment or provision of any other financial benefit (other than from your council or authority) made or provided within the relevant period in respect of any expenses incurred by you in carrying out duties as a member, or towards your election expenses.

Any contract which is made between you, or your spouse or your civil partner (or a body in which you, or your spouse or your civil partner, has a beneficial interest) and your council or authority -

- under which goods or services are to be provided or works are to be executed; and
- which has not been fully discharged.

Any beneficial interest in land which you, or your spouse or your civil partner, have and which is within the area of your council or authority.

Any licence (alone or jointly with others) which you, or your spouse or your civil partner, holds to occupy land in the area of your council or authority for a month or longer.

Any tenancy where (to your knowledge) - the landlord is your council or authority; and the tenant is a body in which you, or your spouse or your civil partner, has a beneficial interest.

Any beneficial interest which you, or your spouse or your civil partner has in securities of a body where -

- (a) that body (to your knowledge) has a place of business or land in the area of your council or authority; and
(b) either -

the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or
if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which you, or your spouse or your civil partner, has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

REPORT TITLE:

Licensing Act 2003 – Application for the Grant of a Premises Licence
Shop & Go, 21 Lord Street, Huddersfield, HD1 1QA

Meeting:	Licensing Panel
Date:	Tuesday 21 st July 2026
Cabinet Member	N/A
Key Decision Eligible for Call In	No No
Purpose of Report To determine the application	
Recommendations - Members of the panel are requested to determine the application Reasons for Recommendations - In accordance with the requirements as set out in the Licensing Act 2003, where relevant representations are received by either a responsible authority or any other person, the matter is referred to the panel for a decision.	
Resource Implications: There are no resource implications.	
Date signed off by <u>Executive Director</u> & name Is it also signed off by the Service Director for Finance? Is it also signed off by the Service Director for Legal Governance and Commissioning (Monitoring Officer)?	Fiona Goldsmith – on behalf of David Shepherd, Strategic Director for Place, Growth and Regeneration Not applicable Not applicable

Electoral wards affected: Netherton and Newsome

Ward councillors consulted: Cllr Karen Allison
Cllr Andrew Cooper
Cllr Susan Lee-Richards

Public or private: Report to be heard in Public

Has GDPR been considered? GDPR has been considered and appropriate sections of the report and supporting documents have been amended.

1. Executive Summary

1.1 The purpose of the report is to inform members of an application for the grant of a Premises licence.

1.2 Four representations have been received; therefore, the matter has been referred to this panel for determination.

2. Information required to take a decision

2.1 Application

On 18th February 2026 the Licensing department received an application for the grant of a premises licence for Shop & Go, 21 Lord Street, Huddersfield, HD1 1QA.

A copy of this application and plan is shown at **Appendix A**.

The application received 4 representations and was due to be heard on 8th April 2026 the applicant requested an adjournment which was agreed by all parties and the date of hearing was re-scheduled for 21st July 2026.

The licensable activities applied for are as follows: -

Sale of Alcohol (off the premises):

Monday – Sunday 00:00 to 00:00

Late Night Refreshment (Indoors)

Monday – Sunday 23:00 to 05:00

The location of the premises is situated within the Huddersfield Town Centre Cumulative Impact Area. The cumulative impact area came into effect on 15th January 2025 and is in place to address alcohol-related crime and disorder that occurs in the Town Centre.

The Cumulative Impact Assessment policy was adopted to give the Licensing Authority greater power to control the number of premises within the Town Centre licensed for sales of alcohol off the premises. The policy was introduced because the Licensing Authority determined that the concentration of off licensed premises were having a detrimental effect on the promotion of the licensing objectives.

The premises has never previously been licensed for the sale of alcohol under the Licensing Act 2003.

A copy of the policy can be seen at **Appendix B**.

Three representations were received from responsible authorities relating to three of the licensing objectives; namely, the prevention of crime and disorder, the prevention of public nuisance and the protection of children from harm.

A fourth representation was received from a member of the public, this representation relates to all four of the licensing objectives; namely, the prevention of crime and

disorder, public safety, the prevention of public nuisance and the protection of children from harm.

A copy of the representations may be seen at **Appendix C**.

2.2 Licensing Policy

Members considering the application must take note of the Authority's Statement of Licensing Policy, which provides the following guidance on how members should approach the application and representation(s).

Executive Summary

In exercising its duties and responsibilities under the terms of the Licensing Act 2003, the Council will operate within the statements and procedures mentioned in this policy statement. Notwithstanding this statement, all applications will be treated on their merits and judged accordingly.

The council will have regard to any relevant guidance issued by the Secretary of State in exercising its powers under the Act.

Purpose

The Licensing Authority will carry out its functions under the Licensing Act 2003 with a view to promoting the four licensing objectives contained in the Act and each has equal weight.

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

The Policy has four main purposes:

- To provide the basis for elected Members to make decisions on applications.
- To inform licence applicants of the basis on which decisions will be taken and therefore give some indication of how they will be able to operate.
- To inform the wider community of the basis on which decisions will be taken and therefore how their needs will be addressed.
- To inform the Courts how decisions have been made and to support those decisions.

The Licensing Authority recognises that each licence application must be considered on its own individual merits in the context of the four licensing objectives, and that unless relevant representations are received from responsible authority's or interested parties, there is no provision for a Licensing Authority to impose conditions on a licence other than those proposed within an application. Only conditions which have been volunteered by the applicant, or which have been determined at a Licensing Panel hearing can be attached to a licence or certificate. If an application is lawfully made and no relevant representations are made in respect of an application, the Licensing Authority is under a duty to grant the licence on the terms sought. Only if relevant representations are made will the Council's discretion be engaged.

2.3 Secretary of State Guidance

Members also need to consider the statutory guidance issued, by the Secretary of State, under Section 182 of the Licensing Act 2003. As the representations related to 4 of the licensing objectives. Member's attention is drawn to this guidance, the relevant parts may be found at **Appendix D**.

3. **Implications for the Council**

3.1 **Council Plan**

The Licensing Service and its Statement of Licensing Policy balance the objective of improving the local economy, improving health and wellbeing and tackling health inequalities and cultural development against noise, nuisance, safeguarding and crime and disorder.

3.2 **Financial Implications**

There are no financial implications in relation to this report.

3.3 **Legal Implications**

In determining the application Members should have regard to the Authority's licensing policy statement and the Secretary of State Guidance. The applicant or any other person who made relevant representations in relation to the application have the right of appeal to the Magistrates Court.

3.4 **Climate Change and Air Quality**

There are no climate change or air quality implications contained in this report.

3.5 **Other (eg Risk, Integrated Impact Assessment or Human Resources)**

Under the provisions of the Licensing Act 2003 there is no requirement for an Integrated Impact Assessment, while licence conditions should not duplicate other statutory provisions, members should be mindful of requirements and responsibilities placed on them by other legislation, which may include:

- The Gambling Act 2005
- The Environment Protection Act 1990
- The Noise Act 1996
- The Clean Neighbourhoods and Environmental Act 2005
- The Regulatory Reform (Fire Safety) Order 2005
- The Health and Safety at Work etc. Act 1974
- The Equality Act 2010
- The Immigration Act 2016
- Regulators' Code under the Legislative and Regulatory Reform Act 2006

4. **Consultation**

4.1 Consultation has taken place in accordance with the requirements set out in the Licensing Act 2003; four representations have been received as detailed above.

5. Engagement

5.1 Engagement is not a requirement as set out in the Licensing Act 2003.

6. Options

6.1 Options considered

Members of the Panel are requested to determine the application.

6.2 Reasons for recommended option

In accordance with the requirements as set out in the Licensing Act 2003, where relevant representations are received by either a responsible authority or any other person, the matter is referred to the panel for a decision.

7. Next steps and timelines

7.1 When determining the application Members, having regard to the representation, may take such steps as they consider appropriate for the promotion of the licensing objectives. These steps are:

- Grant the Premises Licence application
- Grant the Premises Licence application with appropriate conditions
- Exclude from the scope of the licence any of the licensable activities which relate to this application, or
- Reject the Premises Licence application

7.2 Findings on any issues of fact should be on the balance of probability.

7.3 In arriving at a decision Members must have regard to the relevant provisions of the statutory guidance and the licensing policy statement and reasons must be given for any departure.

7.4 The decision should be based on the individual merits of the application.

8. Contact officer

Rox Javaid
01484 221000 extension number 70515
Rox.javaid@kirklees.gov.uk

9. Background Papers and History of Decisions

Licensing Act 2003 Statement of Licensing Policy - [Licensing Policy](#)

Revised guidance issued under section 182 of Licensing Act 2003 - GOV.UK (www.gov.uk)

Cumulative Impact Assessment 2025 [Cumulative Impact Assessment 2025-2028](#)

10. Appendices

Appendix A – Premises Licence Application

Appendix B – Cumulative Impact Assessment

Appendix C – Representations

Appendix D – Secretary of State Guidance

11. Service Director responsible

Katherine Armitage

Service Director – Environmental Strategy and Climate Change

Tel: 01484 221000

Email: Katherine.armitage@kirklees.gov.uk

Appendix A

This page is intentionally left blank

New Premises Licence

Premises Details

Business/Premises Name *

Shop & Go

Premises Address *

21 Lord Street Huddersfield HD1 1QA

Telephone number at premises (if any)

Non-domestic value of premises. *

£ 4300

Applicant Details

I/We apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003.

Please state whether you are applying for a premises licence as:

a person other than an individual -as a limited company/
limited liability partnership

Applicant Details

If you are applying as a person described in one of the above please confirm: *

I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or

Other Applicant (Non Individual)

Name *

Trinity Trading and Consulting Limited

Registered Address *

51 - 53 Market Street, Milnsbridge

Address line 2

Address line 3

Other Applicant (Non Individual)

Town/City *

Huddersfield

County

Postcode *

HD3 4HZ

Registered Number (where applicable)

Description of applicant (for example partnership, company, unincorporated association, etc) *

Private Limited Company

Telephone Number *

Email *

Operating Schedule

When do you want the premises licence to start? *

19/03/2026

If you wish the licence to be valid only for a limited period, when do you want it to end?

Please give a general description of the premises. *

It is an empty corner shop, and I am planning to set up a small convenience store selling sweets, drinks, and crisps. In addition, I am applying for a premises licence to sell alcohol in the shop to help increase footfall.

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

Operating Schedule

What licensable activities do you intend to carry on from the premises? * (Please see sections 1 and 14 of the Licensing Act 2003 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment, late night refreshment or supply of alcohol (please read guidance note 2) *

☐

a) Plays

☐

b) Films

☐

c) Indoor Sporting Events

Operating Schedule

☐

d) Boxing or Wrestling

☐

e) Live Music

☐

f) Recorded Music

☐

g) Performances of Dance

☐

h) Anything of a similar description falling under Music or Dance

☒

i) Provision of Late Night Refreshment

☒

j) Supply of Alcohol

i) Provision of Late Night Refreshment Standard Times

Standard days and timings, where you intend to use the premises for late night refreshment.(please read guidance note 7) *
Please enter times in 24hr format (HH:MM)

Day *

Every Day

00:00

00:00

i) Provision of Late Night Refreshment

Will the provision of late night refreshment take place indoors or outdoors or both? (please read guidance note 3) *

Indoors

Please provide further details.(please read guidance note 4)

State any seasonal variations for the provision of late night refreshment.(please read guidance note 5)

Please state any non-standard timings, where you intend to use the premises for late night refreshment at different times from the Standard days and times listed?(please read guidance note 6)

j) Supply of Alcohol Standard Times

Standard days and timings, where you intend to use the premises for the supply of alcohol. (please read guidance note 7)*
Please enter times in 24hr format (HH:MM)

Day *

Every Day

00:00

00:00

j) Supply of Alcohol

Will the supply of alcohol be for consumption on premises or off premises or both? (please read guidance note 8) *

Off Premises

Is the premises used exclusively or primarily for supply of alcohol for consumption on the premises? *

No

State any seasonal variations for the supply of alcohol. (please read guidance note 5)

Please state any non-standard timings, where you intend to use the premises for the supply of alcohol at different times from the Standard days and times listed? (please read guidance note 6)

Designated Premises Supervisor

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form)

Title *

Mr

First name *

Gowtham

Surname *

Velusamy

Street address *

Town/City *

County

Designated Premises Supervisor

Postcode *

HD3 4JD

Personal Licence Number (if known)

21/02382/LAPER

Issuing Licensing Authority (if known)

Newham

Adult Entertainment

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 9). *

N/A

Opening Hours Standard Times

Standard days and timings, where the premises are open to the public. (please read guidance note 7) * Please enter times in 24hr format (HH:MM)

Day *

Every Day

00:00

00:00

Licensing Objectives

Describe the steps you intend to take to promote the four licensing objectives:

a) General - all four licensing objectives (b, c, d and e) (please read guidance note 10)

We are currently adhering to the all four licensing objectives and actively contributing to the overall safety and wellbeing of the community. In addition to our current efforts, we are committed to implementing further measures aimed at enhancing our adherence to the objectives and ensuring a safer environment for all customers and residents. Some of our major planned future implementations mentioned in following sections.

b) The prevention of crime and disorder *

We have planned to Implement comprehensive security measures such as CCTV cameras, effective crowd control strategies and Trained the staff members to recognise and handle potential instances of crime or disorderly conduct. In addition to that we will Partner with local law enforcement agencies to exchange information and collaborate on crime prevention initiatives. Establish strict policies against illegal

Licensing Objectives

c) Public safety *

activities within the premises and promptly address any breaches.

We have planned to Conduct regular safety inspections to identify and mitigate potential hazards within the establishment and Ensure all equipment and facilities meet safety standards and regulations and also provided adequate emergency exits, fire extinguishers, and clear evacuation routes. In addition to that we educated our staff members on emergency response protocols and conduct periodic drills. So we will continue to follow the above mentioned safety measures strictly.

d) The prevention of public nuisance *

Monitor noise levels and ensure compliance with local noise ordinances. Implement policies to address issues such as littering, loitering, and disruptive behavior. Work closely with neighbouring businesses and residents to address concerns and maintain positive community relations. Encourage customers to respect the surrounding environment and minimise disturbances to others.

e) The protection of children from harm *

We are planning to enforced strict age verification procedures to prevent underage access to alcohol or restricted areas. Clearly display age restrictions and prohibit the sale of age-restricted products to minors. Well trained our staff on identifying and addressing situations involving minors at risk. In Addition to that, we will keep ensuring safety and wellbeing of the children.

Declarations

Declaration Type *

Sole Applicant - Individual or Other

Declarations

I have uploaded a copy of the plan of the premises. I have uploaded a copy of the consent form completed by the individual I wish to be designated premises supervisor, if applicable. I understand I must now advertise my application. I understand that if I do not comply with the above requirements my application will be rejected. Applicable to all individual applicants, including those in partnership which is not a limited liability partnership, but not companies or limited liability partnerships I have included documents demonstrating my entitlement to work in the United Kingdom (please read note 15)

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT' 'IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.

Declarations

Signature/Declaration of applicant or applicant's solicitor or other duly authorised agent (see Guidance Note 11 & 12). If signing/applying on behalf of the applicant, please state your name and in what capacity you are authorised to sign/apply. When submitting an on-line application form the 'Declaration made' checkbox must be selected.

☒ I understand I am not entitled to be issued with a licence if I do not have the entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).

☒ The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15).

Full Name *

Trinity Trading and Consulting Limited

Date *

18/02/2026

Capacity *

Applicant

☒ Declaration made

Do you wish to provide alternative correspondence details? *

No

Email confirmation

On submission an email confirmation will be sent using the details below

Forename

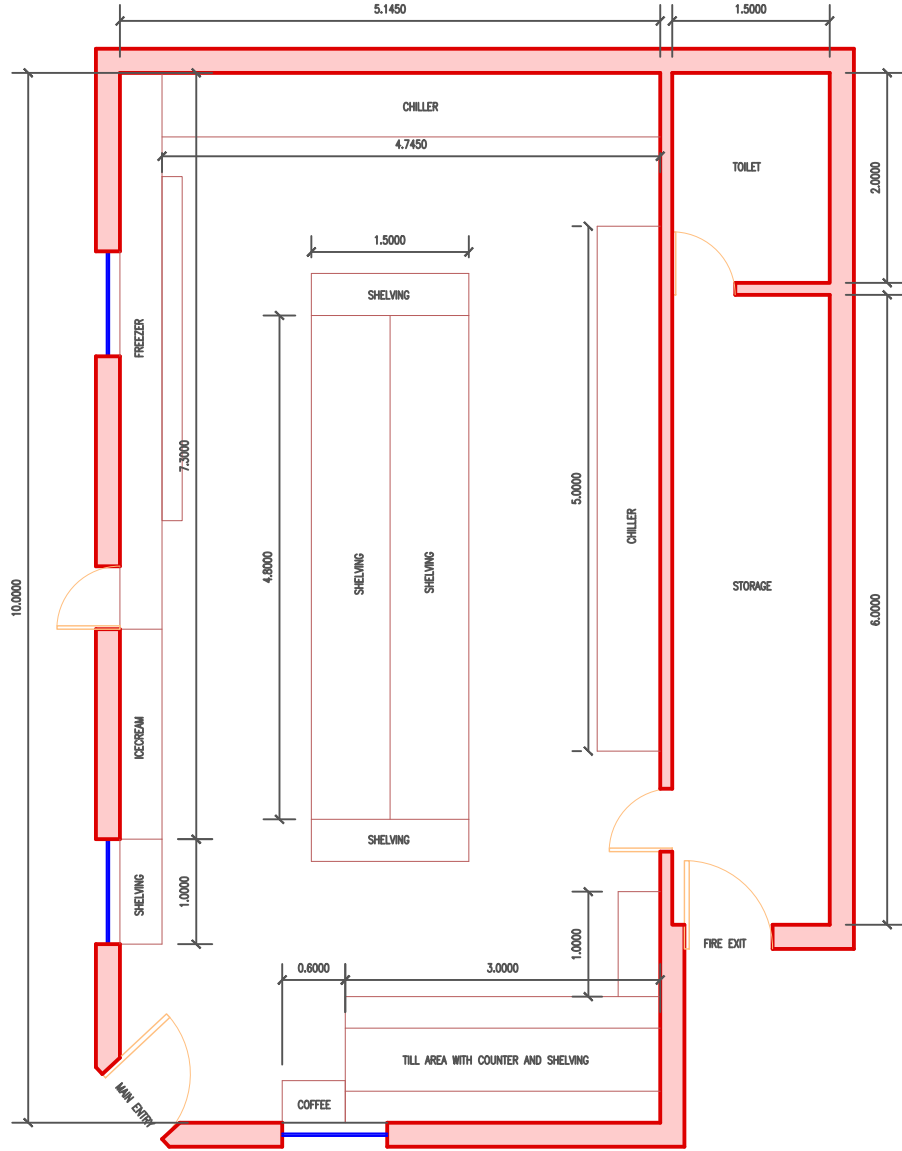
Surname /Company Name

Email *

Telephone

Trinity Trading and Consulting Limited

This page is intentionally left blank



This page is intentionally left blank

Appendix B

This page is intentionally left blank

Licensing Act 2003 (The Act) Cumulative Impact Assessment

2025-2028

Table of Contents

Introduction	1
Cumulative Impact Areas	2
Huddersfield Town Centre Map.....	2
Dewsbury Town Centre Map	3
Evidence to Support Cumulative Impact Assessment	3
Police Statistics	3
Huddersfield Town Centre Statistics	3
Dewsbury Town Centre Statistics	5
Consultation	7
Huddersfield Town Centre Consultation Responses	8
Question 1	8
Question 2	8
Dewsbury Town Centre Consultation Responses.....	15
Question 1	15
Question 2	16
Conclusion	21

Introduction

The Licensing Act 2003 regulates the sale of alcohol, provision of regulated entertainment and provision of late-night refreshment (sale of hot food or drink after 11pm).

Section 5 of the Licensing Act 2003 requires a licensing authority to prepare and publish a statement of its licensing policy at least every five years. During the five-year period, the policy must be kept under review and the licensing authority may make any revisions to it as it considers appropriate.

In April 2018 the Police and Crime Act 2017 introduced a new provision within the Licensing Act 2003, Section 5A. This provision provides that a licensing authority may, in appropriate circumstances, publish a Cumulative Impact Assessment ('the Assessment'), placing Assessments on a statutory footing.

Cumulative Impact is the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area.

The Assessment must set out the evidence to support the authority's opinion, it must be consulted upon before it is published, it must be reviewed every three (3) years, with any review having to be consulted upon and any revisions published along with the evidence.

In publishing a Cumulative Impact Assessment, the Council is setting down a strong statement of intent about the approach to considering the grant or variation of premises licence in the areas described where they are applying for or applying to vary a premises licence with off-sales only. The Council must have regard to the assessment when determining or revising its statement of licensing policy and must have regard to the policy and the statutory guidance issued under Section 182 of the Licensing Act 2003 when making determinations. The Assessment does not change the fundamental way that a licensing decision is made, as each application will be considered on its own merits; and it is open for the Council to grant an application where it is considered appropriate and where the applicant can demonstrate in the operating schedule that they would not be adding to the cumulative impact.

An applicant wishing to obtain a new licence or vary a licence for premises, within a cumulative impact area, will be expected to demonstrate through their operating schedule, the steps they intend to take so that the Council and responsible authorities can be satisfied that granting a new or varied licence will not add to the cumulative impact already being experienced.

The onus is on the applicant to demonstrate how their proposal will not add to the cumulative impact.

As described in the 2012 judgement (*BrewDog Bars Limited v Leeds City Council*), a cumulative impact assessment does not lead to an automatic blanket ban on the grant of a licence and all applications are considered on their own merits and on a case-by-case basis.

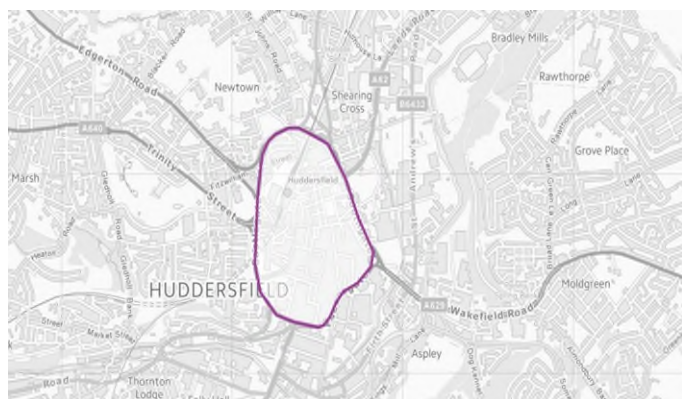
A cumulative impact assessment does not relieve responsible authorities, residents or any interested parties of the need to make representations if deemed necessary. The Council can only consider using a cumulative impact assessment to refuse an application if relevant representations are received. Where no representations are submitted to an application the Council must grant the licence.

Anyone making a representation can base it on the information provided in this assessment, and on the fact that an assessment has been published. It remains the responsibility of anyone making a representation to ensure that it demonstrates how the application shall impact on one or more of the licensing objectives, and it can withstand the scrutiny to which it will be subject to at a hearing and any subsequent appeal.

Cumulative Impact Areas

The Cumulative Impact Areas relate to both Huddersfield and Dewsbury Town Centres, specifically in relation to alcohol licensed premises with off-sales only.

Huddersfield Town Centre Map



Map 1 Huddersfield Town Centre

© Crown Copyright and database right 2024. Ordnance Survey AC0000851069

Dewsbury Town Centre Map



Map 2 Dewsbury Town Centre

© Crown Copyright and database right 2024. Ordnance Survey AC0000851069.

Evidence to Support Cumulative Impact Assessment

Police Statistics

Data provided by West Yorkshire Police shows that there is evidence to suggest that offences with links to alcohol are an issue in both Dewsbury Town Centre and Huddersfield Town Centre.

The information below is based on data collected between 2018 and 2023

Huddersfield Town Centre Statistics

Key

E01011236 Top of ring road - Trinity Street across to St John's Road

E01011107 Majority of town centre and out Leeds Road

E01011229 Bottom of centre - Queensgate to Lockwood Road

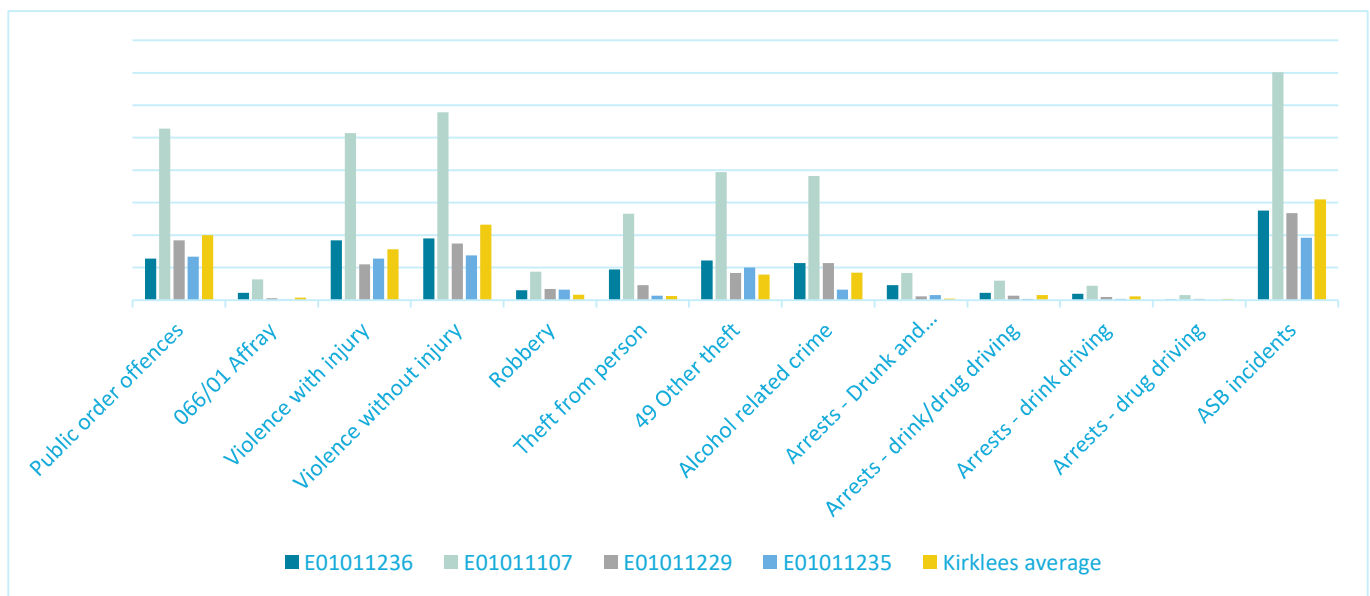
E01011235 Leisure centre, bus station over to Manchester Road

Value less than 50

Lower-layer Super Output Area Level (LSOA)

Offence	E01011236	E01011107	E01011229	E01011235	Kirklees Average
Public order offences	64	264	92	67	100
066/01 Affray					
Violence with injury	92	257	55	64	78
Violence without injury	95	289	87	69	116
Robbery					
Theft from person		133			
49 Other theft	61	197		50	
Alcohol related crime	57	191	57		
Arrests - Drunk and disorderly in a public place					
Arrests - drink/drug driving					
Arrests - drink driving					

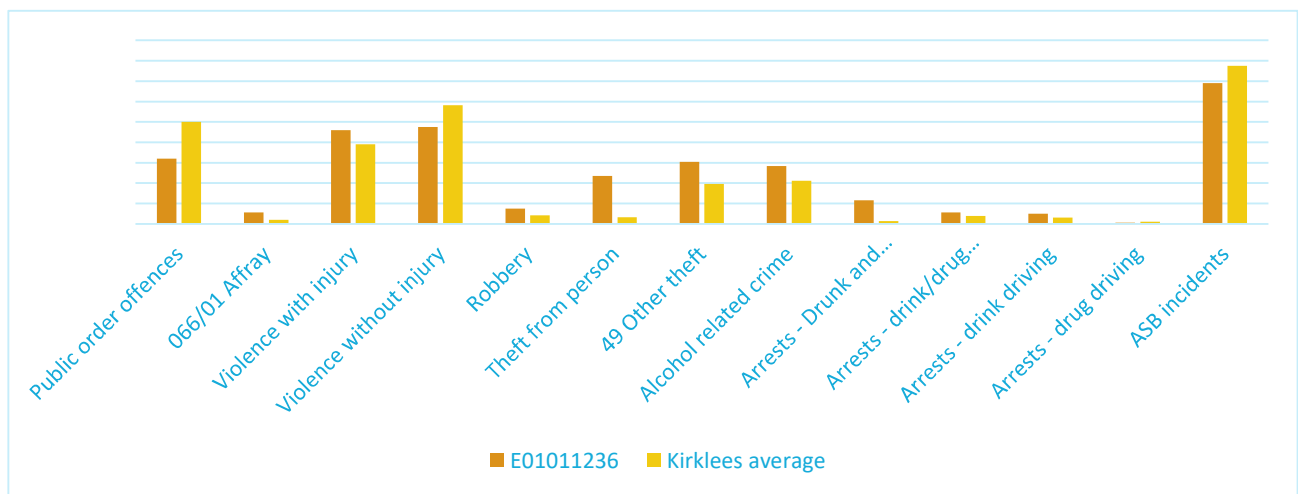
Offence	E01011236	E01011107	E01011229	E01011235	Kirklees Average
Arrests - drug driving					
ASB incidents	138	351	134	96	155
Total crime	563	2301	850	483	810



Dewsbury Town Centre Statistics

Offence	E01011236	Kirklees average
Public order offences	64	100
066/01 Affray		
Violence with injury	92	78
Violence without injury	95	116

Offence	E01011236	Kirklees average
Robbery		
Theft from person		
49 Other theft	61	
Alcohol related crime	57	
Arrests - Drunk and disorderly in a public place		
Arrests - drink/drug driving		
Arrests - drink driving		
Arrests - drug driving		
ASB incidents	138	155
Total crime	563	810



Even with the pandemic in 2020/2021; alcohol related crime was and is causing issues within the two town centres. In the case of Huddersfield town centre, in particular LSOA E0101107 (majority of the town centre out to Leeds Road) the levels of alcohol related crime are significantly above the Kirklees average.

Consultation

Public consultation is a statutory requirement of the Licensing Act 2003, the consultation was carried out between 18th July 2024 and 11th September 2024.

Those consulted were as follows:

- All Elected Members
- All Local MPs
- Parish and Town Councils
- All licence holders
- All Responsible Authorities:
 - o West Yorkshire Police
 - o West Yorkshire Fire Service
 - o Environmental Health and Health and Safety at Work
 - o Planning
 - o Public Health
 - o West Yorkshire Joint Services (Trading Standards)
 - o Secretary of State (Immigration Enforcement)
 - o Kirklees Safeguarding Children Partnership
- The Council's Climate Team
- Community Safety Partnership
- Chamber of Commerce
- Huddersfield BID
- Huddersfield University
- Huddersfield NHS
- Members of the Public and local businesses via Council Comms
- Letters hand delivered to local businesses in both Huddersfield and Dewsbury Town Centre.

In total 135 respondents completed the questionnaire (please note that the below is 146 but people may have fallen into more than one category); those responses were received from: -

- 92 Residents of Kirklees living outside the boundary of both Town Centres
- 26 Residents of Huddersfield Town Centre
- 9 Residents of Dewsbury Town Centre
- 7 Representatives for personal licence holders
- 3 Representatives for the licensed trade
- 3 representatives for a local business in Dewsbury Town Centre
- 1 Representative for a local business in Huddersfield Town Centre
- 1 Ward Councillor
- 1 West Yorkshire Police

- 0 West Yorkshire Fire and Rescue
- 0 Local Health Board
- 3 Other (1 Lives in Kirklees & works for NHS, 1 Kirklees Resident, 1 Parish Council)

Huddersfield Town Centre Consultation Responses

Question 1

To what extent do you agree with the following statement:

There are too many licensed premises selling alcohol (with off-sales only) in Huddersfield Town Centre.

- Agree – 82 (64%)
- Disagree – 27 (21%)
- Not sure / Don't know – 19 (15%)

Question 2

To what extent do you agree with the following statement:

There needs to be a Cumulative Impact Assessment in Huddersfield Town Centre relating to licensed premises selling alcohol (with off-sales) only.

- Agree – 86 (68%)
- Disagree – 23 (18%)
- Not sure / Don't know – 17 (14%)

Comment and responses

Table 1 Huddersfield Town Centre Consultation: Comment and responses

Comments	Council Response
I would like to see more premises open	Comment noted
Far too many street drinkers with access to cheap alcohol.	Comment noted
Way too many people displaying inappropriate behaviour in Huddersfield town centre. Its bad enough at night time. During the day should feel safe for shoppers and workers.	Comment noted
It's not so much the amount of shops selling alcohol it's the low price of the high % alcohol that's the issue, you can get drunk on a couple of £	Comment noted
Most of these so called off licences are obvious fronts for proceeds of crime large gangs often congregate outside there needs tighter controls on these shops everyone knows where the cheap cigs are if needed but no one seems to care	Comment noted - Issues around illegal activity in licensed premises is taken seriously and the licensing service work closely with the Police and Trading Standards. Any evidence of illegal activity should be report to the licensing service via email to licensing@kirklees.gov.uk or West Yorkshire Police
Too many off licence not needed.	Comment noted
The overall feel of the town centre would benefit from general improvements and whilst the blue print project is ongoing something needs to be done to address poor quality shop fronts selling tat and also those that sell cheap food and alcohol. If Huddersfield is to attract the right clientele, then the offer available needs to be reviewed as a priority	The powers to introduce a Cumulative Impact Assessment do not extend to addressing issues relating to shop frontages.

Comments	Council Response
Encourages those with an alcohol problem. Gather in town centre as alcohol easily available	Comment noted
It's not only licensed premises but also under the counter vape shops	The Licensing Act 2003 does not extend to controlling the sale of vapes.
Surely something can be done about the extremely suspicious shops they have been popping up (which all look the same - black plastic sign with blue, white or red lettering and many people assume are money laundering fronts). No issue with genuine retailers but these shops are everywhere and given that very few people are seen going into them seems very odd.	Comment noted - Issues around illegal activity in licensed premises is taken seriously and the licensing service work closely with the Police and Trading Standards. Any evidence of illegal activity should be report to the licensing service via email to licensing@kirklees.gov.uk or West Yorkshire Police
Alcohol is available in a multitude of outlets. Closing the off-license shops will have little impact. From what I'm hearing it would seem that certain groups object to Alcohol being sold anywhere. I have not heard of other towns considering this. Please be honest.	Comment noted
Too many people sitting about drunk and then all the cans and bottles are discarded or left without being put in bins. Just makes the town look even more run down than it already is becoming	Comment noted
Too many drunks round in the day round the town centre	Comment noted
Stop granting licenses if you guys are worried, and when you do, put restrictions regarding the tacky neon shops	The purpose of the survey is to ascertain whether there is evidence and need to introduce a cumulative impact assessment which will result in new applicants for premises licences for off sales only having to evidence they can uphold the licensing objectives. The only way a licensing authority can refuse an application is for the

Comments	Council Response
	matter to go to a hearing for a decision currently is due to representations being received when applications are submitted.
They are too many in the town centre and its where the local drunks will go to and then sit around and leave rubbish everywhere, fight, swear in front of young kids and just cause havoc in the town centre	Comment noted.
There are far too many, in most they are renowned for selling other stuff illegal or otherwise they tend to attract gatherings around their shops. Drinkers etc congregating in town centre parks etc. It then attracts shoplifters, drug users and young people.	Comment noted
too many drunks about ruining the town	Comment noted
The sooner the council gets rid of them the better	Comment noted
If you consider the number of off licences in the town centre and also in the immediate area to the town centre , places like Fartown, Marsh, Aspley, Lockwood.. You have to ask the question, how is it possible for all these to function and make a profit legally.??.....they all seem to be able to achieve profit margins even though there are far cheaper option in the immediate area to them.... Seem a little	Comment noted
The evidence is visible enough as you travel through the town centre	Comment noted
It's actually quite limited due to the minority shops We need more restaurants as we only really have Nando's if a pizza express could	Comment noted

Comments	Council Response
join that would be a real boost. Not everyone likes to deal with Wetherspoons/Lloyds	
Don't mind premises selling alcohol it's the state of the frontage of these shops that's needs sorting.	The powers to introduce a Cumulative Impact Assessment do not extend to addressing issues relating to shop frontages.
Sort out the frontage of these shops. No problem with selling alcohol.	The powers to introduce a Cumulative Impact Assessment do not extend to addressing issues relating to shop frontages.
Shop keepers. Need to show the same responsibility as landlords and bar owners, stop the selling of very small bottles of liqueur. Stop shops selling glass bottles as this can be a form of antisocial behaviour by smashing bottles. Stop shops having cheap tacky signage and don't allow posters showing alcohol and remove all pictures from shop windows promoting the selling of alcoholic drinks.	Comment noted.
Too many sell to anyone. Whether they are clearly intoxicated already or underage	Comment noted.
The issue is not the number of premises selling alcohol, it's the fact that the police do nothing to combat antisocial behaviour of any kind in Huddersfield and Kirklees. The priority should be to have a robust and effective policing system and response to any form of antisocial behaviour and not blame and punish the shop keepers for trying to make a living and driving cash into the economy!!!	Comment noted – Comment noted - Issues around illegal activity in licensed premises is taken seriously and the licensing service work closely with the Police and Trading Standards. Any evidence of illegal activity should be report to the licensing service via email to licensing@kirklees.gov.uk or West Yorkshire Police
Well it depends on the times???	Comment noted.

Comments	Council Response
Huddersfield town centre after 6pm is rowdy and behaviour frequently uncouth and slightly (and sometimes) threatening. I strongly suspect the behaviour to be alcohol-fuelled. So I stay away after 5pm. I have been to 2 concerts at the Town Hall, and got out of town as soon as the concerts finished. Alcohol sellers are only supplying a demand but the consumers have so little self-control etc	Comment noted.
Far too many seedy booze shops and selling cheap alcohol and snide tobacco	Comment noted.
Increases anti-social behaviour	Comment noted.
I have seen children who are obviously still at school walking round the town centre drunk. The supermarkets are very hot on verifying underage attempts to buy alcohol and I suspect that they are obtaining alcohol from the independent small shops.	Comment noted - Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their concerns to licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
Stop selling alcohol to under 18s	Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their concerns to licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
The selling of underaged customer and intoxicated persons is not challenged	Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their concerns to

Comments	Council Response
	licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
I agree with proposals. I also think u should look at the amount of poor takeaways in the town centre. Vape shops also. Not much more than vape shops chicken shops and poor Asian shops that aren't run properly. Alcohol related crime should b looked at too	Comment noted – The Licensing Authority can only regulate those premises which hold a premises licence.
They can't all be running at a profit unless income is coming from another source	Comment noted.
Many new ones have opened but vape shops are the worst has many sell to under 16yo girls over boys, we only need to look at the ring near NatWest to see how many are drunk at 8am	Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their concerns to licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
People visibly drunk makes Huddersfield town centre feel threatening and it puts us off going into town for shopping and leisure	Comment noted.
There has been at least 4 off licences opened in the vicinity of market place... where all the drunks hang out. Why was this allowed	When applications for premises licences are received, they are granted unless representations are received, which are relevant, at which time the application would be taken to a licensing hearing for a decision to be made about whether an application is refused or granted. There is no facility in law to just refuse an application.

Comments	Council Response
Far too many off-licence premises selling Cheap alcohol to the Town Centre drinkers.	Comment noted.
Far too many little shops popping up selling alcohol along side newspapers sweets and heaps of other spurious products including drugs paraphernalia	Comment noted.
There is no published definition on the content/structure/measurements of a CIA other than vague 'council-speak' phrases	The survey is to gain evidence / comments from stakeholders to establish whether there is a need for a CIA to be introduced in relation to premises with off sales only in both Huddersfield and Dewsbury Town Centres. There is no definitive definition of what evidence is required to implement a CIA, however, the police statistics and the responses to this survey will provide the authority with the evidence it feels is required to make a decision about whether a CIA is required or not.

Dewsbury Town Centre Consultation Responses

Question 1

To what extent do you agree with the following statement:

There are too many licensed premises selling alcohol (with off-sales only) in Dewsbury Town Centre.

- Agree – 52 (42%)
- Disagree – 14 (11%)
- Not sure / Don't know – 57 (46%)

Question 2

To what extent do you agree with the following statement:

There needs to be a Cumulative Impact Assessment in Dewsbury Town Centre relating to licensed premises selling alcohol (with off-sales) only.

- Agree – 56 (45%)
- Disagree – 14 (11%)
- Not sure / Don't know – 54 (44%)

Comment and responses

Table 2 Dewsbury Town Centre Consultation: Comment and responses

Comments	Council Response
Too easy to buy. Son lives in Belfast & large areas you cannot buy it, especially in family areas	Comment noted
Too many in the area, the people sat drinking day/night in certain areas of the town makes the town a no-go area. The shops selling are eastern European shops who sell to anyone at any time.	Comment noted
Why especially in Dewsbury town centre do we need approximately 5 off licences selling alcohol it's just not needed shouldn't be any more than 1	Comment noted
The sale of alcohol in Dewsbury Town Centre is causing the problem with street drinking during the day. I think that If alcohol was not so readily available, there would not be as many drinkers and people would feel safe to shop in the town.	Comment noted

Comments	Council Response
Again, under the counter shops	Comment noted
Criminality, asb fear to use town.	Comment noted
Sorry I cannot comment here fairly as I have not been to the town centre in Dewsbury for many years - but have been to Huddersfield centre weekly	Comment noted
Dewsbury town has died not a safe place day or night	Comment noted
Not familiar with the area	Comment noted
It attracts congregation, other illegal activities, young people. It puts off people going around shopping, day to day business, it puts people off makes you feel unsafe.	Comment noted
Worse than Huddersfield. Needs to be a serious shake up as they are too many licence premises selling alcohol and creating these groups of drunks who have no place in society	Comment noted
Can't comment on Dewsbury	Comment noted
I don't live in Dewsbury but have not noticed lots of alcohol selling shops.	Comment noted
Stop the shops promoting the selling of alcohol, stop shops selling small bottles of liqueur and selling beer in glass bottles. Scrutinising shop keepers with the same rules as landlords and bar owners. Don't	Comment noted – regulation of licensed premises is carried out in accordance with the law, the licensing service cannot place additional conditions onto premises unless representations are received to applications

Comments	Council Response
allow posters and signage that promotes alcohol.	which results in the matter being heard at a Licensing Hearing.
Far too many in the Town Centre. Kirklees seem to licenses to anyone	Comment noted – Licences are issued to those to apply and when there are no representations received from responsible authorities or interested parties stating that the application would undermine one or more of the licensing objectives.
There are not too many premises in either area they are just not policed well enough in terms of underage drinking and there is little to no police presence for anti social behaviour whilst drinking. Also Kirklees consists of more than just Dewsbury and Huddersfield would be good to gain feedback on other areas too	Comment noted.
The trouble in the town centres caused by alcohol is nothing to do with number of premises selling it. It's cultural. The town centres are dying on their feet. The last thing we need is small businesses who rely on alcohol sales from responsible residents being unable to operate their businesses, whilst alcohol sales then move to the multinational monopolies that are Tesco's and Sainsburys!!	Comment noted.
not drinking and hanging about in groups is the bigger issue in Dewsbury, the shops need to be enforcing the don't sell to people under the influence of alcohol and turning away trade, sadly as Kirklees have killed off Dewsbury the shopkeepers left have no choice but to sell to anyone to make some money	Comment noted.
The issue is not the number of premises selling alcohol, it's the fact that the police do nothing to combat antisocial behaviour	Comment noted.

Comments	Council Response
of any kind in Dewsbury and Kirklees. The priority should be to have a robust and effective policing system and response to any form of antisocial behaviour and not blame and punish the shop keepers for trying to make a living and driving cash into the economy!!!	
There is constantly groups of people in the town centre drinking causing anti-social behaviour people arguing fighting urinating defecating and been sick in turn this causes people to be scared to walk around town or even just visit for that matter I don't think the amount of shops selling alcohol is the problem in a whole it's more that there isn't enough police in town to move them on	Comment noted.
The purchasing of alcohol isn't the problem. Its always going to be available. The problem in Dewsbury is a lack of policing.	Comment noted.
Myself and many others have stopped entering the town due to the number of people found drinking on the streets. Many social issues have arisen due to this. More needs to be done to support these vulnerable individuals.	Comment noted.
I'm disappointed that there is no more reflection on the hours... times etc of course these matter???? If alcohol is not available late night/early morning.... I'd expect less offences....but so few questions in this survey.... With so few answers.... I feel I've missed a few buttons?????	Comment noted – The consultation does not relate to specific times licensed premises are open, when each premises applies for a licence, it is at this point they apply for the hours for which they wish to trade and if no representations against those applications are received the application is granted as applied for.
Some of the councillors in Leeds have limited the number of gambling shops and	Comment noted – there is no legal way for the Council to cancel all licensed premises in an

Comments	Council Response
off-licences due to the social challenges that were occurring. Unfortunately the same has happened in Dewsbury. We all do not want younger generations to do the same. A lot of addiction related mental health issues are on the rise. We all demand you to cancel all the licensed premises selling alcohol in Dewsbury.	area. This consultation is about whether there is a need for a Cumulative Impact Assessment due to there being a significant number of licensed premises concentrated in one area.
Groups of men are standing or sitting just outside these licensed shops and drinking resulting in an intimidating atmosphere for shoppers. The police are rarely seen.	Comment noted – the Council has no control over policing.
I own a shop in Dewsbury and I am losing customers due to them being put off by street drinkers they see in town on a daily basis. Particularly on marketplace and bottom of Daisy hill	Comment noted.
To many shops in Dewsbury sell alcohol already leading to anti-social behaviour	Comment noted.
Increases anti-social behaviour	Comment noted.
I suspect that there are the same issues in Dewsbury being caused by independent hops selling alcohol to people under the age of 18.	Comment noted – Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their concerns to licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
Stop selling to under 18s	Comment noted – Issues regarding shops selling alcohol to underage persons are taken seriously, and the licensing service work closely with the Police and Trading Standards. Members of the public should report their

Comments	Council Response
	concerns to licensing via email to licensing@kirklees.gov.uk Or West Yorkshire Police
Refer to the Huddersfield comment - also I anecdotally don't believe there are that many off-premise shops in Dewsbury centre	Comment noted.
Too many people drinking Alcohol on the streets and making it unsafe for those visiting the town.	Comment noted.

Conclusion

This cumulative impact assessment has been carried out in accordance with Section 5A of the Licensing Act 2003. This cumulative impact assessment is published because it considers that the number of premises with off-sales only within Huddersfield and Town Centre and Dewsbury Town Centre are impacting on the promotion of the licensing objectives.

This assessment is formed due to analysis of the crime statistics provided by West Yorkshire Police between the period 2018 to 2023. In addition, following consideration of the comments received following the requisite statutory consultation that has been carried out, which by large support the decision for the introduction of the assessment. It confirms that it would be inconsistent with the Council's duty to promote the licensing objectives to grant new and variation applications for premises licences with off-sales in both Huddersfield and Dewsbury Town Centres.

The assessment is designed as a guide for the Licensing Authority, the Police Licensing Team and Environmental Health when making representations to applications within the areas of both Huddersfield and Dewsbury Town Centres as shown on the maps within this assessment.

It acts as a guide for applicants who wish to apply for a new or vary an existing premises licence within the defined areas for them to clearly outline within their operating schedule how they will uphold the licensing objectives.

Finally, it will assist the Licensing Authority in its decision-making process when representations are received for new and variation applications for premises with off-sales only.

This page is intentionally left blank

Appendix C

This page is intentionally left blank

Your Ref: DSFX1771382421863

Rox Javaid
Licensing
Kirklees Council
PO Box 1720
Huddersfield
HD1 9EL

Dear Ms Javaid

**Licensing Act 2003 Representation to the application for a new Premises Licence
DSFX1771382421863 (PR00529), Shop & Go, 21 Lord Street, Huddersfield, HD1 1QA**

I write to make a representation on behalf of Kirklees Council in its capacity as a Licensing Authority which is deemed a Responsible Authority under the Licensing Act 2003.

This representation is made as the licensing authority have concerns the application could have a negative impact on the following licensing objectives –

- the prevention of crime and disorder,
- public nuisance, and
- protection of children from harm.

The premises to which this application relates falls directly within the Huddersfield Town Centre Cumulative Impact Area ('CIA'). As such, this representation also refers to the Council's Cumulative Impact Assessment Policy which forms part of the Council's Statement of Licensing Policy ('SoLP').

1. The Council's CIA policy was adopted to give the licensing authority greater power to control the number of premises within the town centre licensed for sales of alcohol off the premises. The CIA policy was introduced because the licensing authority determined that the concentration of 'off licensed' premises was having a detrimental effect on the promotion of the licensing objectives.
2. The effect of the CIA policy is that for applications for new premises licences, within the cumulative impact area, it would be inconsistent with the licensing authority's duty to promote the licensing objectives to grant that new licence. Effectively introducing a presumption that the application will be refused unless the applicant can rebut this presumption by demonstrating, through their operating schedule, that their application will

have no negative cumulative impact on the licensing objectives, including prevention of crime and disorder, public nuisance and protection of children from harm.

3. Paragraph 5.5 of the Council's Statement of Licensing Policy reminds applicants that responsible authorities, or other people may make representations if they feel the applicants' proposals do not adequately promote the licensing objectives.
4. Paragraph 5.6 of the Councils statement of licensing policy goes on to recommend early consultation with responsible authorities.

The purpose of this is to promote early engagement with responsible authorities and for responsible authorities to outline any concerns or risk they may have and afford an applicant the opportunity to address those concerns and risks in their operating schedule.

5. As already stated, the application relates to a premises that falls directly within the Huddersfield Town Centre Cumulative Impact Area, and the application is seeking authorisation to sell alcohol off the premises which is a licensing activity covered by the CIA policy. The Council's CIA policy states –

This cumulative impact assessment has been carried out in accordance with Section 5A of the Licensing Act 2003. This cumulative impact assessment is published because it considers that the number of premises with off sales only within Huddersfield and Town Centre and Dewsbury Town Centre are impacting on the promotion of the licensing objectives.

This assessment is formed due to analysis of the crime statistics provided by West Yorkshire Police between the period 2018 to 2023. In addition, following consideration of the comments received following the requisite statutory consultation that has been carried out, which by large support the decision for the introduction of the assessment. It confirms that it would be inconsistent with the Council's duty to promote the licensing objectives to grant new and variation applications for premises licences with off sales in both Huddersfield and Dewsbury Town Centres.

6. The Licensing Act 2003 ('the 2003 Act') is accompanied by Statutory Guidance issued under Section 182 of the 2003 Act. This guidance is published to assist both licensing authorities and applicants in understanding their responsibilities under the Licensing Act 2003.
7. Paragraphs 8.41 to 8.49 sets out the expectations on applicants when considering what steps they should take to promote the licensing objectives, in particular paragraphs 8.41 and 8.42 provide –

8.41 In completing an operating schedule, applicants are expected to have regard to the statement of licensing policy for their area. They must also be aware of the expectations of the licensing authority and the responsible authorities as to the steps that are appropriate for the promotion of the licensing objectives, and to demonstrate knowledge of their local area when describing the steps they propose to take to promote the licensing objectives.

Licensing authorities and responsible authorities are expected to publish information about what is meant by the promotion of the licensing objectives and to ensure that applicants can readily access advice about these matters. However, applicants are

also expected to undertake their own enquiries about the area in which the premises are situated to inform the content of the application.

8.42 Applicants are, in particular, expected to obtain sufficient information to enable them to demonstrate, when setting out the steps they propose to take to promote the licensing objectives, that they understand:

- the layout of the local area and physical environment including crime and disorder hotspots, proximity to residential premises and proximity to areas where children may congregate
- any risk posed to the local area by the applicants' proposed licensable activities; and
- any local initiatives (for example, local crime reduction initiatives or voluntary schemes including local taxi-marshalling schemes, street pastors and other schemes) which may help to mitigate potential risks.

8. Paragraphs 8.43 of the guidance deals specifically with the expectations on applicants where a specific policy applies in the area, for example an area subject to a CIA policy -

8.43 Applicants are expected to include positive proposals in their application on how they will manage any potential risks. Where specific policies apply in the area (for example, a cumulative impact assessment), applicants are also expected to demonstrate an understanding of how the policy impacts on their application; any measures they will take to mitigate the impact; and why they consider the application should be an exception to the policy.

9. Paragraph 8.47 goes on to say –

8.47 Applicants are expected to provide licensing authorities with sufficient information in this section to determine the extent to which their proposed steps are appropriate to promote the licensing objectives in the local area. Applications must not be based on providing a set of standard conditions to promote the licensing objectives and applicants are expected to make it clear why the steps they are proposing are appropriate for the premises.

10. Paragraphs 14.20 to 14.48 of the statutory guidance provides information relating to cumulative impact and the CIA policies themselves. In particular paragraph 14.40 provides –

14.40 In publishing a CIA a licensing authority is setting down a strong statement of intent about its approach to considering applications for the grant or variation of premises licences or club premises certificates in the area described. Having published a CIA a licensing authority must have regard to the assessment when determining or revising its statement of licensing policy. It is therefore expected that, in respect of each relevant application in the area concerned, the licensing authority will be considering whether it is appropriate to make a representation to its committee as a responsible authority in its own right.

The CIA does not, however, change the fundamental way that licensing decisions are made. It is therefore open to the licensing authority to grant an application where it considers it is appropriate and where the applicant can demonstrate in the operating schedule that they would not be adding to the cumulative impact. Applications in areas covered by a CIA should therefore give consideration to potential cumulative impact

issues when setting out the steps that will be taken to promote the licensing objectives.

Where relevant representations are received and a licensing authority decides to grant an application it will need to provide the applicant, the chief officer of police and all parties who made relevant representations with reasons for granting the application and this should include any reasons for departing from their own policy.

11. Regarding the licensing authority's representations. This application for a premises licence seeks to authorise the retail sale of alcohol off the premises seven days a week 24 hours a day, in addition the application also seeks to authorise the provision of late-night refreshment, indoors during the same period. However, the licensing authority accepts the licensing of late-night refreshment is only applicable between the hours of 23:00 and 05:00 the following day.
12. The applicant describes the premises as a small convenience store selling sweets, drinks and crisps, and wishes to sell alcohol to increase footfall. As part of the application the applicant has put forward the following steps, they will take to promote the licensing objectives –

a) General

'We are currently adhering to the all four licensing objectives and actively contributing to the overall safety and wellbeing of the community. In addition to our current efforts, we are committed to implementing further measures aimed at enhancing our adherence to the objectives and ensuring a safer environment for all customers and residents. Some of our major planned future implementations mentioned in the following sections.'

b) Prevention of crime and disorder

'We have planned to implement comprehensive security measures such as CCTV cameras, effective crowd control strategies and Trained staff members to recognise and handle potential instances of crime or disorderly conduct. In addition to that we will Partner with local law enforcement agencies to exchange information and collaborate on crime prevention initiatives. Establish strict policies against illegal activities within the premises and promptly address any breaches.'

c) Public safety

'We have planned to Conduct regular safety inspections to identify and mitigate potential hazards within the establishment and Ensure all equipment and facilities meet safety standards and regulations and also provide adequate emergency exits, fire extinguishers, and clear evacuation routes. In addition to that we educate our staff members on emergency response protocols and conduct periodical drills. So we will continue to follow the above mentioned safety measures strictly.'

d) Prevention of public nuisance

'Monitor noise levels and ensure compliance with local noise ordinances. Implement policies to address issues such as littering, loitering, and disruptive behaviour. Work closely with neighbouring businesses and residents to address

concerns and maintain positive community relations. Encourage customers to respect the surrounding environment and minimise disturbance to others.'

e) The protection of children from harm

'We are planning to enforced strict age verification procedures to prevent underage access to alcohol or restricted areas. Clearly display age restrictions and prohibit the sale of age-restricted products to minors. Well trained our staff on identifying and addressing situations involving minors at risk. In Addition to that, we will keep ensuring safety and wellbeing of the children.'

13. I understand the applicant has been advised the premises falls within the Council cumulative impact area, and yet at the time of making this representation the applicant has offered no additional information as to what steps they will take to address the concerns and risks identified in the Council's CIA policy.
14. Equally the application does not provide any evidence to demonstrate that it will not add to cumulative impact and therefore does not meet the requirements of the Council's CIA policy; and it is the view of the Licensing Authority, in its capacity as responsible authority, this does not therefore justify the granting of the licence.
15. Against this policy and guidance framework, the Licensing Authority considers that the applicant's operating schedule does not meet the requirements for applications within a cumulative impact area.
16. The measures proposed are generic and could be applied to any premises in any location. They do not demonstrate how this application will avoid adding to cumulative impact, as required by paragraph 8.43 of the statutory guidance.
17. This failure is compounded by the fact that the application seeks authorisation for the sale of alcohol 24 hours per day, 7 days per week. The applicant has provided no assessment of the risks associated with early-morning or late-night availability of alcohol in the town centre, nor any measures to mitigate the well-documented link between 24-hour off-sales, street drinking, and alcohol-related anti-social behaviour identified within the CIA.
18. In addition, this representation is made on the basis that the application will also have an adverse effect on the following licensing objectives.

Prevention of Crime and Disorder

The applicant has stated the steps they will take to promote this objective will be to 'plan to implement a comprehensive security measure such as CCTV'. While the licensing authority supports the use of CCTV the applicants have not detailed the type or specification of this CCTV, this makes it difficult to assess the suitability of the system.

In addition, the applicant has not offered any further details on how, or to what level, their staff will be trained or details of the policies they will establish to address illegal activity.

It is the view of the licensing authority that this lack of detail in the measures the applicant will take demonstrates insufficient consideration of their responsibilities to prevent crime and disorder.

Public Nuisance

Street drinking remains a concern for the local community in Huddersfield, and this is demonstrated in the recent consultation on the review of the Council's Public Space Protection Orders ('PSPO'), during which a range of issues were raised by the public including that street drinking and incidents of street drinkers urinating and defecating in the street had gotten worse.

Given this application relates to retail sales of alcohol off the premises, and is in the area covered by the PSPO, the applicant has not offered any further steps as to how they intend to operate their business in a way that would prevent public nuisance in particular street drinking.

Off-sales premises, by their nature, facilitate immediate consumption in public places. The applicant has not proposed any measures such as restrictions on high-strength alcohol, single cans, or window advertising, all of which are measures identified in the Council's policy as tools to mitigate street drinking and public nuisance.

Protection of Children from Harm

Paragraphs 2.28 to 2.38 of the Statutory Guidance provides guidance on protecting children from harm. Paragraph 2.29 provides –

2.29 The Government believes that it is completely unacceptable to sell alcohol to children. Conditions relating to the access of children where alcohol is sold and which are appropriate to protect them from harm should be carefully considered. [...]

In addition to the statutory guidance the Council's statement of Licensing Policy at 6.27 provides the following –

6.27 The licensing authority expects licensees to put in place clear measures to prevent consumption of alcohol by children, including:

- *Challenge 25, or a similar age-checking scheme, supported by clear signage, till prompts where appropriate and refusal logs.*
- *Use of independent age verification checks.*
- *Risk assessment of proxy purchasing and mitigation measures to prevent it.*
- *Employment of personal licensees where appropriate.*
- *Appropriate staff training and refresher training.*

In making their application the applicant has stated they plan to enforce strict age verification procedures and prohibit age-restricted sales to minors; however, the applicant has not provided any detail on how they will achieve this. At a minimum the licensing authority would expect applicants to have considered the points outlined in 6.27 of the Council's statement of licensing policy (above).

It is the view of the licensing authority this absence of measures shows a lack of understanding of the responsibilities placed on licence holders to protect children from harm, and therefore places children at risk.

19. In conclusion, the Licensing Authority does not support this application as the applicant has failed to demonstrate –

- An understanding of how the Council's CIA policy impacts their application,
- The reasons as to why the application might be considered an exception to the Council's CIA policy,
- An understanding of their responsibilities relating to prevention of crime and disorder and public nuisance and put in place measures to meet those responsibilities; and in the absence of any measures fails in their responsibility to promote those objectives,
- An understanding of their responsibilities relating to protecting children from harm and put in place measures to meet those responsibilities; and in the absence of any measures will fail to protect children from harm,

20. Given the absence of any CIA-specific mitigation and the 24-hour nature of the application, the Licensing Authority does not consider that the imposition of conditions would be sufficient or appropriate to address the risks identified. To do so would require the Licensing Panel to effectively redesign the application, contrary to the principles set out in the statutory guidance.

21. In determining this application, the Members of the Licensing Panel are invited to have regard to the Council's CIA, Statement of Licensing Policy, and the statutory guidance. In the absence of compelling and locally-specific evidence that the grant of this licence would not add to cumulative impact, the Licensing Authority submits that the application should be refused in accordance with policy.

Yours sincerely

R. Williams
Public Protection Operational Manager
On behalf of the Licensing Authority

This page is intentionally left blank

From: Woodhead, Richard <richard.woodhead1@westyorkshire.police.uk>
Sent: 18 February 2026 15:05
To: Rox Javaid <Rox.Javaid@kirklees.gov.uk>
Cc: Licensing <Licensing@kirklees.gov.uk>; Mike Skelton
<Mike.Skelton@kirklees.gov.uk>; Swift, Katie
<Katie.swift@westyorkshire.police.uk>; Fiona Goldsmith
<Fiona.Goldsmith@kirklees.gov.uk>
Subject: RE: PR00529 Shop & Go, 21 Lord Street, Huddersfield

CAUTION: External email. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear All,

I have received the application for a 24 hour convenience store to be known as Shop and Go on Lord Street. This proposed business sits within the area covered by the town centre cumulative impact policy.

West Yorkshire police wish to object to the grant of this licence.

The proposed conditions do not fully cover our concerns regarding the following licensing objectives:

- 1) Crime and disorder. A shop such as this could become a target for ASB, encouraging street drinkers, and also become a target for more serious crimes such as theft, violence against the person, and even armed robbery. We have had 24hour shops in the Kirklees areas that have become victims of such crimes. The proposed measures do not eliminate or reduce such threats.
- 2) Public Nuisance . This shop would have persons going in 24 hours a day, 7 days a week, to buy alcohol. The larger supermarkets in the town centre all shut before midnight (Sainsbury's and Tesco). A small business such as this may attract anti social drinkers, who have been refused service elsewhere, and then go onto consume the alcohol in the town centre, which falls under a P.S.P.O.

Therefore, West Yorkshire police wish to object to this application.

R.Woodhead P.A.L.O.

This page is intentionally left blank

OBJECTION PUBLIC HEALTH 17.3.2026

Re: application for a new Premises Licence DSFX1771382421863 (PR00529), Shop & Go, 21 Lord Street, Huddersfield, HD1 1QA

Kirklees Public Health Team are writing to make a representation with regards to this application, in their capacity as a Responsible Authority under the Licensing Act 2003. This application for a premises licence seeks to authorise the retail sale of alcohol off the premises seven days a week 24 hours a day.

The Kirklees Public Health Alcohol Licensing Toolkit ¹ provides local data on indicators that are linked to consumption of and potential harm from alcohol and compares these indicators between neighbourhoods in Kirklees (using the geography of Lower Super Output Areas or LSOAs ²). Each LSOA is ranked and given a relative risk score in terms of each indicator, to give a sense of the risk of alcohol harm in that LSOA and the impact that a new premises there is likely to have. An overall composite ranking and risk score is also given that gives a sense across all indicators reported on in the toolkit.

At the time of writing, the LSOA that the proposed premises sits in ranks 1 out of 259 total LSOAs in Kirklees (where 1 is the worst and 259 the best) for the following indicators in the toolkit: -

- Off-licensed premises density
- On-licensed premises density
- Antisocial behaviour crimes
- Alcohol-related crimes
- Arrests for driving whilst over the legal limit
- Alcohol and domestic abuse flagged crime

The LSOA also ranks highly for the remaining indicators as below: -

- Alcohol-specific hospital admissions – 27 out of 259
- Alcoholic liver disease mortality – 25 out of 259
- Index of Multiple Deprivation (IMD) score – 24 out of 259

The LSOA is in the worst decile for every indicator in the toolkit except alcohol-specific hospital admissions (where it is in the second worst) and is ranked 1 out of 259 in the overall composite ranking.

This means that the LSOA that the proposed premises sits in has the highest risk of alcohol-related harm in the Kirklees district. Alcohol-related health outcomes for the local population are much worse than the Kirklees average and levels of crime are the worst across all LSOAs in Kirklees. A new premises in this LSOA has the potential to exacerbate risk of harm, worsen outcomes and increase existing inequalities by further increasing access to alcohol on an off-license basis.

¹ <https://www.kirklees.gov.uk/beta/health-and-well-being/public-health-alcohol-sales-toolkit.aspx>

²

<https://www.ons.gov.uk/methodology/geography/ukgeographies/censusgeographies/census2021geographies>

We also note that the proposed premises falls under the Huddersfield Town Centre Cumulative Impact Area ('CIA'), requiring the applicant to demonstrate, through their operating schedule, that their application will have no negative cumulative impact on the licensing objectives. It also is situated just across the road from Huddersfield Mission and the Welcome Centre, both of which are regularly accessed by people who are in a vulnerable or precarious state and/or have complex needs, including people who are unhoused, living in poverty, and/or living with mental health needs or addiction. The proximity of the proposed premises to an area where these populations gather and the increased access to alcohol that this entails may have a detrimental impact on them and worsen existing inequalities experienced by these populations.

Further to the context above, this representation is made on the basis that the application may also have an adverse effect on the following licensing objectives: -

Prevention of crime and disorder

There are high existing levels of crime in the local area surrounding the proposed premises (as outlined above), as well as a high footfall of people of people from vulnerable populations.

The lack of specific detail provided in the measures cited by the applicant lead us to believe that these measures will be insufficient in managing the risk of further negative impact and fulfilling their duty to prevent crime and disorder.

Public nuisance

There are high existing levels of antisocial behaviour and alcohol-related crime in the local area surrounding the proposed premises (as outlined above), as well as a high footfall of people from vulnerable populations. We also note that street drinking and public nuisance as a result of this has been raised as a concern by local communities and that there is a Public Space Protection Order (PSPO) in place. Off-sales premises, by their nature, facilitate immediate consumption in public places.

Given all of this, the applicant has not offered any further steps as to how they intend to operate their business in a way that would prevent public nuisance and, as such, the measures that have been identified are judged to be insufficient in managing the risk of further negative impact.

Protection of children from harm

There are high existing levels of crime in the local area surrounding the proposed premises (as outlined above), as well as a high footfall of people of people from vulnerable populations. Given this second point, there is a likelihood that children with some level of vulnerability will be accessing the services located nearby.

The lack of specific detail provided in the measures cited by the applicant lead us to believe that these measures will be insufficient in managing the risk of further negative impact and fulfilling their duty to protect children from harm.

Risk in relation to all of the above is further exacerbated by the 24-hour nature of the application.

Further to this, it is our view that the applicant has not demonstrated an adequate understanding of how the Council's CIA policy works or fulfilled the requirement on them under this policy to demonstrate that their application does not have a negative cumulative impact on the licensing objectives.

In conclusion, the public health team does not support this application as the applicant has failed to demonstrate: -

- How they will ensure that the licensing objectives are not adversely impacted by their application, especially given preexisting levels of alcohol-related poor health outcomes and crime in the local area (as shown in the alcohol licensing toolkit) and the proximity of the proposed premises to locations where vulnerable populations gather.
- How they will have regard for the Council's CIA policy and why their application might be considered an exception to this policy, by ensuring that negative cumulative impact on the licensing objectives is avoided.

We do not consider that the imposition of conditions would be sufficient or appropriate to address the risks identified in these circumstances, especially given the lack of CIA-specific mitigation identified and the 24-hour nature of the application.

NB. Please note that the public health team does not provide specialist technical advice or feedback on licensing applications in relation to matters such as noise or air quality. This responsibility lies with other council teams, and their responses will be provided separately.

Appendix 1 – Public Health Recommendations

Due to the evidence outlined above, it is the perspective of the public health team that this application should not be granted. However, if the application is granted, we would recommend that the following conditions should be included at a minimum.

- 1) Training should be implemented and refreshed on at least an annual basis for all staff involved in the sale of alcohol, with focus on the legalities and risks associated with sale of alcohol to children, including around proxy sales.
- 2) Premises should implement Challenge 25, including by training and supporting staff, ensuring that the scheme is promoted via visible signage and keeping record of failed attempts to buy alcohol for those without accepted ID.
- 3) All refusals of sale to be documented in a refusals book including, as a minimum, date and time of the incident, description of the potential buyer and any action taken. Book to be checked by the designated premises supervisor on at least a monthly basis to ensure that the system is being used.
- 4) Premises to have a defined process in place around refusal of sale to customers who are intoxicated, in the interest of prevention of public nuisance and individual harm.
- 5) Training should be implemented for all staff in terms of managing the impact on the local area of people entering and leaving the premises, especially at late hours, i.e., between 11pm and 7am or where people are intoxicated. Where people are leaving the premises in an intoxicated or otherwise vulnerable state, staff should also be ready and able to manage immediate concerns re: safety of those individuals.
- 6) Premises to restrict the sale or supply of super strength beers, lagers and ciders (i.e., those with an ABV of 6.4% or more) and to ensure they stock and sell low and no alcohol alternatives.

-----Original Message-----

> From:

> Sent: 19 February 2026 11:22

> To: Licensing <Licensing@kirklees.gov.uk>

> Subject: Objection to Alcohol Licence Application for 21 Lord Street,
> Huddersfield

>

>

>

> CAUTION: External email. Do not click links or open attachments unless you recognize the sender and know the content is safe.

>

>

> Dear Licensing Team,

>

> I am writing to submit a formal objection to the alcohol licence application for 21 Lord Street, Huddersfield. Based on the location, crime data, and ongoing issues in the immediate vicinity, granting a licence at this address would directly undermine all four Licensing Act 2003 objectives.

>

> 1. Prevention of Crime and Disorder

> The premises are approximately 50 metres from St Peter's Gardens, an area consistently associated with anti-social behaviour. Huddersfield town centre recorded 519 crimes in a single recent month within the HD1 district, including 170 violent offences, 78 shoplifting incidents, 56 drug-related offences, and 59 public order crimes. St Peter's Street, which borders the church park, appears in monthly Police.uk crime logs throughout the last 12 months. Introducing an additional alcohol outlet in this hotspot would increase the likelihood of crime, disorder, and alcohol-related incidents.

>

> 2. Public Safety

> The church park and surrounding streets attract vulnerable individuals, including rough sleepers and young people. Alcohol availability in such close proximity increases the risk of intoxication-related harm, unsafe behaviour, and conflict. The narrow layout of Lord Street and St Peter's Street creates natural pinch points where disorder can escalate quickly, posing a direct risk to public safety.

>

> 3. Prevention of Public Nuisance

> The area around St Peter's Gardens already experiences recurring issues with noise, litter, loitering, and late-night disturbance. Crime patterns in the HD1 area show persistent public order offences and anti-social behaviour. An additional alcohol-licensed premises would exacerbate these problems, particularly given the park's role as a gathering point. This would negatively impact nearby residents, businesses, and visitors to the church and town centre.

>

> 4. Protection of Children from Harm

> St Peter's Gardens is used by families, young people, and children attending church activities. Locating an alcohol outlet within such a short distance increases the risk of children being exposed to intoxicated individuals, disorderly behaviour,

and criminal activity. This is incompatible with safeguarding expectations around a public park and place of worship.

>

> Given the sensitive location and the clear crime data for the surrounding area, granting an alcohol licence at 21 Lord Street would be contrary to all four licensing objectives. I respectfully request that the application be refused.

>

> Yours faithfully,

>

> Here is the evidence summary

>

>

> EVIDENCE SUMMARY – CRIME & LICENSING RISKS

>

> Location: St Peter's Gardens (Church Park) & Surrounding Streets

> Proposed Premises: 21 Lord Street, Huddersfield HD1

> Distance: Approx. 120–150 metres (≈ 1.5-minute walk) from the church
> park

>

> ---

>

> 1. Crime Levels in the HD1 Area (Verified Data)

>

> Recent crime data for the HD1 district shows consistently high activity:

>

> Monthly Crime Snapshot (Example: September 2025)

>

> • Total crimes: 519

> • Violent offences: 170

> • Shoplifting: 78

> • Public order offences: 59

> • Drug-related offences: 56

> • Other theft: 39

>

>

> This places HD1 among the highest-activity zones in West Yorkshire.

>

> ---

>

> 2. Crime at St Peter's Street (Church Park Boundary)

>

> Police.uk confirms that St Peter's Street, which borders St Peter's Gardens, recorded crime every month for the last 12 months (March 2024 → March 2025).

> This includes recurring reports of:

>

> • Anti-social behaviour

> • Violence

> • Drug activity

> • Public disorder

>

- >
- > This establishes the church park as a persistent hotspot.
- >
- > ---
- >
- > 3. Police Crackdowns in Huddersfield Town Centre
- >
- > Recent enforcement operations show the scale of the problem:
- >
- > August Operation
- >
- > • 48 arrests in the town centre
- > • Offences included: shop theft, burglary, drugs, assault, offensive weapons, drunk & disorderly
- >
- >
- > September Operation
- >
- > • 53 arrests in just over two weeks
- > • Offences included: weapons possession, shop theft, public order offences, breaches of Criminal Behaviour Orders
- >
- >
- > These operations took place within the same policing zone as St Peter's Gardens and Lord Street.
- >
- > ---
- >
- > 4. Proximity Risk – Why 21 Lord Street Is Problematic
- >
- > • The proposed premises is directly opposite the church park area ($\approx$ 120–150m).
- > • St Peter's Gardens is already a known gathering point for ASB, vulnerable individuals, and disorder.
- > • Adding an alcohol outlet in this micro-zone would intensify existing problems, not mitigate them.
- >
- >
- > ---
- >
- > 5. Licensing Objectives at Risk
- >
- > Licensing Objective Evidence of Risk
- > 1. Prevention of Crime & Disorder High crime levels in HD1; monthly crime at St Peter's Street; 100+ arrests in recent crackdowns.
- > 2. Public Safety Vulnerable individuals in the park; narrow streets; existing disorder; increased intoxication risk.
- > 3. Prevention of Public Nuisance Noise, loitering, litter, and ASB already present in the park area.
- > 4. Protection of Children from Harm Children use the church park; increased exposure to intoxicated individuals and disorder.

>
> Sent from my iPhone
>
> <<http://www.kirklees.gov.uk>>
> [http://www.kirklees.gov.uk/beta/assets/global/img/logo_kirkleesCouncil_x2.png]
>
> Website<<https://www.kirklees.gov.uk>> |
> News<<http://www.kirkleestogether.co.uk>> | Email
> Updates<<http://www.kirklees.gov.uk/stayconnected>> |
> Facebook<<https://www.facebook.com/liveinkirklees>> | Twitter
> <<https://twitter.com/KirkleesCouncil>>

Email 19.02.2026

Hi

There is another problem with the property that's being used for licensing as well

1. ****Unauthorised Structural Alterations to a Grade II Listed Building****

The two properties—10 Saint Peter Street and 21 Lord Street—have been internally combined without any listed building consent or planning permission. This is a Grade II listed structure, and any internal structural changes require strict approval. Proceeding without consent is a direct breach of planning and heritage regulations.

2. ****Incorrect and Unapproved Use Class****

The intended uses stated for these properties do not fall under Class E (retail):

- 10 Saint Peter Street is being used as an internet café.
- 21 Lord Street is being used for taxi operations.

Neither of these uses has an approved change-of-use application. I am attaching the last submitted application, which clearly shows that no change of use has been granted.

The class use of the property is not changed and two grade 2 listed building are merged into one

21 lords street and 10 St Peter's street is merged without planning permission Thank you.

Sent from my iPhone

Email 20.02.2026

Dear Licensing Team,

I acknowledge receipt of your response regarding the premises licence application. However, I must raise a fundamental concern that directly impacts the validity of the application.

The property in question has undergone structural alterations without lawful planning approval, and no change of use has been legally obtained to classify it as a retail premises. Under Kirklees Council regulations, planning consent and lawful use class designation are prerequisites before a premises can even be considered for licensing. Without these, the licensing panel would be deliberating on an application that lacks a lawful foundation.

Furthermore, the application appears inconsistent in its scope. While 21 Lords Street is explicitly mentioned, 10 St Peter Street is also included in the licensable activities. This discrepancy requires clarification, as both addresses must be legally established and properly documented before any licensing consideration.

In light of these issues, I respectfully submit that the applicant must first obtain lawful planning consent and demonstrate the correct use class designation before the licensing panel proceeds. To do otherwise would undermine the integrity of the licensing process and contravene the Council's regulatory framework.

I request that these matters be addressed and clarified prior to any panel hearing.

Yours sincerely,

Sent from my iPhone

Email 23.02.2026

I would like to be present at the hearing for several important reasons. I have already emailed Planning about this matter. We previously paid fees for one of our properties and ended up losing money due to the council's actions. What concerns me even more is how the applicants managed to merge two separate properties into one without any planning approval. Their licence application was submitted for only one address, yet they are operating across two.

If such actions are already happening without proper oversight, it raises serious questions about what they might do once a licence is granted.

Thank you,

This page is intentionally left blank

Appendix D

This page is intentionally left blank

Relevant Sections of Secretary of State Guidance – Under Section 182 of Licensing Act 2003

Crime and disorder

2.1 Licensing authorities should look to the police as the main source of advice on crime and disorder. They should also seek to involve the local Community Safety Partnership (CSP).

2.2 In the exercise of their functions, licensing authorities should seek to co-operate with the Security Industry Authority (“SIA”) as far as possible and consider adding relevant conditions to licences where appropriate. The SIA also plays an important role in preventing crime and disorder by ensuring that door supervisors are properly licensed and, in partnership with police and other agencies, that security companies are not being used as fronts for serious and organised criminal activity. This may include making specific enquiries or visiting premises through intelligence led operations in conjunction with the police, local authorities and other partner agencies. Similarly, the provision of requirements for door supervision may be appropriate to ensure that people who are drunk, drug dealers or people carrying firearms do not enter the premises and ensuring that the police are kept informed.

2.3 Conditions should be targeted on deterrence and preventing crime and disorder including the prevention of illegal working in licensed premises (see paragraph 10.10). For example, where there is good reason to suppose that disorder may take place, the presence of closed-circuit television (CCTV) cameras both inside and immediately outside the premises can actively deter disorder, nuisance, anti-social behaviour and crime generally. Some licence holders may wish to have cameras on their premises for the prevention of crime directed against the business itself, its staff, or its customers. But any condition may require a broader approach, and it may be appropriate to ensure that the precise location of cameras is set out on plans to ensure that certain areas are properly covered and there is no subsequent dispute over the terms of the condition.

2.4 The inclusion of radio links and ring-round phone systems should be considered an appropriate condition for public houses, bars and nightclubs operating in city and town centre leisure areas with a high density of licensed premises. These systems allow managers of licensed premises to communicate instantly with the police and facilitate a rapid response to any disorder which may be endangering the customers and staff on the premises.

2.5 Conditions relating to the management competency of designated premises supervisors should not normally be attached to premises licences. It will normally be the responsibility of the premises licence holder as an employer, and not the licensing authority, to ensure that the managers appointed at the premises are competent and appropriately trained. The designated premises supervisor is the key person who will usually be responsible for the day to day management of the premises by the premises licence holder, including the prevention of disorder. A condition of this kind may only be justified as appropriate in rare circumstances

where it can be demonstrated that, in the circumstances associated with particular premises, poor management competency could give rise to issues of crime and disorder and public safety.

2.6 The prevention of crime includes the prevention of immigration crime including the prevention of illegal working in licensed premises. Licensing authorities should work with Home Office Immigration Enforcement, as well as the police, in respect of these matters. Licence conditions that are considered appropriate for the prevention of illegal working in licensed premises might include requiring a premises licence holder to undertake right to work checks on all staff employed at the licensed premises or requiring that a copy of any document checked as part of a right to work check are retained at the licensed premises.

Public nuisance

2.15 The 2003 Act enables licensing authorities and responsible authorities, through representations, to consider what constitutes public nuisance and what is appropriate to prevent it in terms of conditions attached to specific premises licences and club premises certificates. It is therefore important that in considering the promotion of this licensing objective, licensing authorities and responsible authorities focus on the effect of the licensable activities at the specific premises on persons living and working (including those carrying on business) in the area around the premises which may be disproportionate and unreasonable. The issues will mainly concern noise nuisance.

2.16 Public nuisance is given a statutory meaning in many pieces of legislation. It is however not narrowly defined in the 2003 Act and retains its broad common law meaning. It may include in appropriate circumstances the reduction of the living and working amenity and environment of other persons living and working in the area of the licensed premises. Public nuisance may also arise as a result of the adverse effects of artificial light, dust, odour and insects or where its effect is prejudicial to health.

2.17 Conditions relating to noise nuisance will usually concern steps appropriate to control the levels of noise emanating from premises. This might be achieved by a simple measure such as ensuring that doors and windows are kept closed after a particular time, or persons are not permitted in garden areas of the premises after a certain time. More sophisticated measures like the installation of acoustic curtains or rubber speaker mounts to mitigate sound escape from the premises may be appropriate. However, conditions in relation to live or recorded music may not be enforceable in circumstances where the entertainment activity itself is not licensable (see chapter 16). Any conditions appropriate to promote the prevention of public nuisance should be tailored to the type, nature and characteristics of the specific premises and its licensable activities. Licensing authorities should avoid inappropriate or disproportionate measures that could deter events that are valuable to the community, such as live music. Noise limiters, for example, are expensive to purchase and install and are likely to be a considerable burden for smaller venues.

2.18 As with all conditions, those relating to noise nuisance may not be appropriate in certain circumstances where provisions in other legislation adequately protect those living in the area of the premises. But as stated earlier in this Guidance, the

approach of licensing authorities and responsible authorities should be one of prevention and when their powers are engaged, licensing authorities should be aware of the fact that other legislation may not adequately cover concerns raised in relevant representations and additional conditions may be appropriate.

2.19 Where applications have given rise to representations, any appropriate conditions should normally focus on the most sensitive periods. For example, the most sensitive period for people being disturbed by unreasonably loud music is at night and into the morning.

2.20 Measures to control light pollution will also require careful thought. Bright lighting outside premises which is considered appropriate to prevent crime and disorder may itself give rise to light pollution for some neighbours. Applicants, licensing authorities and responsible authorities will need to balance these issues.

2.21 Beyond the immediate area surrounding the premises, these are matters for the personal responsibility of individuals under the law. An individual who engages in anti-social behaviour is accountable in their own right. However, it would be perfectly reasonable for a licensing authority to impose a condition, following relevant representations, that requires the licence holder or club to place signs at the exits from the building encouraging patrons to be quiet until they leave the area, or that, if they wish to smoke, to do so at designated places on the premises instead of outside, and to respect the rights of people living nearby to a peaceful night.

Public safety

2.7 Licence holders have a responsibility to ensure the safety of those using their premises, as a part of their duties under the 2003 Act. This concerns the safety of people using the relevant premises rather than public health which is addressed in other legislation. Physical safety includes the prevention of accidents and injuries and other immediate harms that can result from alcohol consumption such as unconsciousness or alcohol poisoning. Conditions relating to public safety may also promote the crime and disorder objective as noted above. There will of course be occasions when a public safety condition could incidentally benefit a person's health more generally, but it should not be the purpose of the condition as this would be outside the licensing authority's powers (be ultra vires) under the 2003 Act. Conditions should not be imposed on a premises licence or club premises certificate which relate to cleanliness or hygiene.

2.8 A number of matters should be considered in relation to public safety. These may include:

- Fire safety;*
- Ensuring appropriate access for emergency services such as ambulances;*
- Good communication with local authorities and emergency services, for example communications networks with the police and signing up for local incident alerts (see paragraph 2.4 above);*

- Ensuring the presence of trained first aiders on the premises and appropriate first aid kits;
- Ensuring the safety of people when leaving the premises (for example, through the provision of information on late-night transportation);
- Ensuring appropriate and frequent waste disposal, particularly of glass bottles;
- Ensuring appropriate limits on the maximum capacity of the premises (see paragraphs 2.12-2.13, and Chapter 10; and
- Considering the use of CCTV in and around the premises (as noted in paragraph 2.3 above, this may also assist with promoting the crime and disorder objective).

2.9 The measures that are appropriate to promote public safety will vary between premises and the matters listed above may not apply in all cases. As set out in Chapter 8 (8.38-8.46), applicants should consider when making their application which steps it is appropriate to take to promote the public safety objective and demonstrate how they achieve that.

1.2 2.10 Licence holders should make provision to ensure that premises users safely leave their premises. Measures that may assist include: • Providing information on the premises of local taxi companies who can provide safe transportation home; and • Ensuring adequate lighting outside the premises, particularly on paths leading to and from the premises and in car parks.

1.3 2.11 Where there is a requirement in other legislation for premises open to the public or for employers to possess certificates attesting to the safety or satisfactory nature of certain equipment or fixtures on the premises, it would be inappropriate for a licensing condition to require possession of such a certificate. However, it would be permissible to require as a condition of a licence or certificate, if appropriate, checks on this equipment to be conducted at specified intervals and for evidence of these checks to be retained by the premises licence holder or club provided this does not duplicate or gold-plate a requirement in other legislation. Similarly, it would be permissible for licensing authorities, if they receive relevant representations from responsible authorities or any other persons, to attach conditions which require equipment of particular standards to be maintained on the premises. Responsible authorities – such as health and safety authorities – should therefore make their expectations clear in this respect to enable prospective licence holders or clubs to prepare effective operating schedules and club operating schedules.

1.4 2.12 “Safe capacities” should only be imposed where appropriate for the promotion of public safety or the prevention of disorder on the relevant premises. For example, if a capacity has been imposed through other legislation, it would be inappropriate to reproduce it in a premises licence. Indeed, it would also be wrong to lay down conditions which conflict with other legal requirements. However, if no safe capacity has been imposed through other legislation, a responsible authority may consider it appropriate for a new capacity to be attached to the premises which would apply at any material time when the licensable activities are taking place and make representations to that effect. For example, in certain circumstances, capacity

limits may be appropriate in preventing disorder, as overcrowded venues can increase the risks of crowds becoming frustrated and hostile.

1.5 2.13 The permitted capacity is a limit on the number of persons who may be on the premises at any time, following a recommendation by the relevant fire and rescue authority under the Regulatory Reform (Fire Safety) Order 2005. For any application for a premises licence or club premises certificate for premises without an existing permitted capacity where the applicant wishes to take advantage of the special provisions set out in section 177 of the 2003 Act¹, the applicant should conduct their own risk assessment as to the appropriate capacity of the premises. They should send their recommendation to the fire and rescue authority which will consider it and decide what the “permitted capacity” of those premises should be.

1.6 2.14 Public safety may include the safety of performers appearing at any premises, but does not extend to the prevention of injury from participation in a boxing or wrestling entertainment.

Protection of children from harm

2.22 The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.

2.23 The Government believes that it is completely unacceptable to sell alcohol to children. Conditions relating to the access of children where alcohol is sold and which are appropriate to protect them from harm should be carefully considered. Moreover, conditions restricting the access of children to premises should be strongly considered in circumstances where:

- adult entertainment is provided;*
- a member or members of the current management have been convicted for serving alcohol to minors or with a reputation for allowing underage drinking (other than in the context of the exemption in the 2003 Act relating to 16 and 17 year olds consuming beer, wine and cider when accompanied by an adult during a table meal);*
- it is known that unaccompanied children have been allowed access;*
- there is a known association with drug taking or dealing; or*
- in some cases, the premises are used exclusively or primarily for the sale of alcohol for consumption on the premises.*

2.24 It is also possible that activities, such as adult entertainment, may take place at certain times on premises but not at other times. For example, premises may operate as a café bar during the day providing meals for families but also provide entertainment with a sexual content after 8.00pm. It is not possible to give an exhaustive list of what amounts to entertainment or services of an adult or sexual nature. Applicants, responsible Revised Guidance issued under section 182 of the Licensing Act 2003¹¹ authorities and licensing authorities will need to consider this point carefully. This would broadly include topless bar staff, striptease, lap-, table- or pole-dancing, performances involving feigned violence or horrific incidents, feigned or actual sexual acts or fetishism, or entertainment involving strong and offensive language.

2.25 Applicants must be clear in their operating schedules about the activities and times at which the events would take place to help determine when it is not appropriate for children to enter the premises. Consideration should also be given to the proximity of premises to schools and youth clubs so that applicants take appropriate steps to ensure that advertising relating to their premises, or relating to events at their premises, is not displayed at a time when children are likely to be near the premises.

2.26 Licensing authorities and responsible authorities should expect applicants, when preparing an operating schedule or club operating schedule, to set out the steps to be taken to protect children from harm when on the premises.

2.27 Conditions, where they are appropriate, should reflect the licensable activities taking place on the premises. In addition to the mandatory condition regarding age verification, other conditions relating to the protection of children from harm can include: • restrictions on the hours when children may be present; • restrictions or exclusions on the presence of children under certain ages when particular specified activities are taking place; • restrictions on the parts of the premises to which children may have access; • age restrictions (below 18); • restrictions or exclusions when certain activities are taking place; • requirements for an accompanying adult (including for example, a combination of requirements which provide that children under a particular age must be accompanied by an adult); and • full exclusion of people under 18 from the premises when any licensable activities are taking place.

2.28 Please see also Chapter 10 for details about the Licensing Act 2003 (Mandatory Licensing Conditions) Order 2010.

2.29 Licensing authorities should give considerable weight to representations about child protection matters. In addition to the responsible authority whose functions relate directly to child protection, the Director of Public Health may also have access to relevant evidence to inform such representations. These representations may include, amongst other things, the use of health data about the harms that alcohol can cause to underage drinkers. Where a responsible authority, or other person, presents evidence to the licensing authority linking specific premises with harms to children (such as ambulance data or emergency department attendances by persons under 18 years old with alcohol-related illnesses or injuries) this evidence should be considered, and the licensing authority should also consider what action is appropriate to ensure this licensing objective is effectively enforced. In relation to applications for the grant of a licence in areas where evidence is presented on high levels of alcohol-related harms in persons aged under 18, it is recommended that the licensing authority considers what conditions may be appropriate to ensure that this objective is promoted effectively.

2.30 The 2003 Act provides that, where a premises licence or club premises certificate 12 | Revised Guidance issued under section 182 of the Licensing Act 2003 authorises the exhibition of a film, it must include a condition requiring the admission of children to films to be restricted in accordance with recommendations given either by a body designated under section 4 of the Video Recordings Act 1984 specified in the licence (the British Board of Film Classification is currently the only body which has been so designated) or by the licensing authority itself. Further details are given in Chapter 10.

2.31 Theatres may present a range of diverse activities and entertainment including, for example, variety shows incorporating adult entertainment. It is appropriate in these cases for a licensing authority to consider restricting the admission of children in such circumstances. Entertainments may also be presented at theatres specifically for children. It will be appropriate to consider whether a condition should be attached to a premises licence or club premises certificate which requires the presence of a sufficient number of adult staff on the premises to ensure the wellbeing of the children during any emergency.

This page is intentionally left blank