

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.