

Appendix 6

In the matter of the Licensing Act 2003


**And in the matter of an application for premises known as and situated at 5 Briggate,
Leeds, LS1 3LZ**

Submissions by the Chief Constable of West Yorkshire

**In respect of the submissions made by the applicant of a premises licence for
5 Briggate with regards to the Leeds City Council Statement of Licensing Policy**

1. The Chief Constable notes with concern the submissions made by the Applicant which culminate in the suggestion that Section 7 of the Cumulative Impact Policy be set aside.
2. The Chief Constable respectfully supports the submissions of the Local Authority both as to the facts of, for example, consultations and the law and seeks to make a brief additional submission.
3. The city centre of Leeds is a well-defined and understood area. The Chief Constable submits that there is no flaw in the policy as contended for by the Applicant. Further, the Chief Constable would respectfully submit that no confusion could have been caused to the Applicant in this case whose application concerns premises at the very heart of the city centre.
4. The objections to the policy are misconceived. The policy is the product of years of work and experience designed to provide both democratic control and flexibility to the night time economy in a major city. There have been entirely proper consultations

5. The Chief Constable submits that the suggestion that the zoning arrangements within the CIP area are decided by a “private cabal” is incorrect, inflammatory and tautological. The Applicant correctly identifies the right to a hearing before the committee and the rebuttable nature of the presumption before referring to designation as being an “effective ban.”
6. West Yorkshire Police Licensing Department involvement is to supply annual crime statistics to Leeds City Council at their request, upon which the city centre CIP is based.
7. The Chief Constable is concerned as to whether the inflammatory nature in which the application is being conducted reflects the way in which the Applicant would co-operate with the Police and Local Authority in the event that a licence was granted.


KBW Chambers, Leeds.

27th November 2017