



Eich cyf / Your ref: Gofynner am / Please ask for: Emyr Jones  
Fy nghyf / My ref: Llinell Uniongyrchol / Direct Line: (01267) 228717  
Dyddiad / Date: 1<sup>st</sup> July 2024 E-bost / E-mail: publicprotection@carmarthenshire.gov.uk

Head of Housing and Public Protection  
Carmarthenshire County Council  
3 Spilman Street,  
Carmarthen  
SA31 1LE

Dear Sir,

**RE: Application for a Premises Licence  
Donuts & Dragons, 7b King Street, Carmarthen, Carmarthenshire, SA31  
1BD  
Application Date 03/06/2024**

Further to the receipt of the above application, the Licensing Authority make the following representations:

a) Previous Enforcement Action / Prosecutions

The premises does not have the benefit of a current licence and there have been no previous prosecutions or enforcement action taken by the licensing authority in relation to these premises.

b) Complaints.

There have been no complaints received by the licensing authority in relation to these premises.

c) Responsible Authority Referrals.

The licensing authority has not received any referrals from the other responsible authorities in relation to the above premises.

d) Relevant Sections of the Statutory Guidance.

The Licensing Authority believes that the following sections of the Statutory Guidance are relevant to this licence application: - Section 1 Introduction, Section 2 relating to The Licensing Objectives, Section 5 relating to Premises

**Jonathan Morgan**

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licences, Section 8 relating to Applications for Premises Licences and Section 10 relating to Licence Conditions.

e) Relevant Sections of the Local Licensing Policy.

The Licensing Authority believes that the following sections of Carmarthenshire's Licensing Policy are relevant to this licence application:- Section 3 Fundamental principles, Section 4 Conditions of Licence, Sections 5 – 9 relating to The Licensing Objectives and Section 10 relating to Cumulative Impact Assessments – in particular paragraphs 10.5 and 10.6:-

**Nott Square, King Street and Queen Street, Carmarthen.**

**10.5** The Licensing Authority considers that the number of premises licences in force for premises in Nott Square, King Street and Queen Street, Carmarthen is such that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.

The area is shown on the plan attached at appendix H. This Cumulative Impact Assessment applies to any property which has a boundary on Nott Square, King Street and Queen Street, Carmarthen.

This cumulative impact assessment applies to premises that sell alcohol for consumption both on and off the premises as well as premises that supply late night refreshment.

**10.6** Where relevant representations are received, it is the Licensing Authority's intention to refuse applications in respect of Nott Square, King Street and Queen Street, Carmarthen as shown on the plan attached at appendix H for; (a) New Premises Licences (b) The variation of such licences that are considered likely to add to the existing cumulative impact.

This Assessment is intended to be strictly applied and will only be overridden in genuinely exceptional circumstances

Exceptions are unlikely to be made on the grounds that the premises are, or will be, well managed

Exceptions should be directed at the reasons underlying the Assessment. An exception might arise where an application proposes;

(a) To effect a real reduction in capacity

(b) To replace vertical drinking with seated consumption and waiter service.

(c) To transfer an operation from one premises to another, where the size and location of the second premises is likely to cause less detrimental Impact and will promote the licensing objectives.

(d) The substitution of existing licensable activity at a premises with licensable activities which would have less impact on the area and would be more likely to further the licensing objectives.

f) Proposed Operating Schedule.

Having considered the current application and the operating schedule put forward by the applicant, the Licensing Authority make the following representations:-

As set out above, the application relates to a premises which is within the Cumulative Impact Assessment (CIA) area for King Street Carmarthen. The CIA

for King Street was adopted by Council in February 2024 for the reasons set out on page 26 of the Licensing Policy Document. At Appendix J the Policy document also sets out the evidence provided by Dyfed Powys Police in support of the CIA.

However, I note that the applicants have provided a supporting document setting out their business model and listing a number of aspects of their business which, in their submission will ensure that granting the application will not add to the cumulative Impact of licensed premises in King Street .

- This includes the fact that the sale of alcohol will be made by table service only, no standing or bar service will be offered.
- Alcohol sales will be incidental to the provision of food and soft drink as well as other activity at the café including the playing of board games.
- Alcohol sales are for consumption on the premises only. No drinks to be taken out of the premises.
- It is also noted that the application does not seek to offer any type of regulated entertainment.

The application sets out the proposed permitted hours for the sale of alcohol, which is limited to - Mondays to Sundays between 12 noon and 10.30pm with an extension only on New Years Eve until 12.30am.

The proposed opening hours of the café are 10am until 11pm each day.

I note also that neither the Police or Environmental Health have made representations objecting to the granting of the application and no representations have been received from any other parties.

If the licensing sub committee when determining the application decide that the application is unlikely to add to the Cumulative Impact in King Street Carmarthen and depart from the Licensing Policy due to the exceptional nature of this application, I would request that conditions be attached to the licence to replicate the limitations set out in the bullet points above and to replicate the statements made in the operating schedule attached to the application.

These representations have been prepared on the 1<sup>st</sup> of July 2024 with the benefit of viewing the original application and supporting documents.

I would be grateful if the applicant could contact me to discuss the above representations at the earliest opportunity and certainly prior to the application being referred to a Licensing Sub Committee hearing for determination.

If you require any further information or assistance, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'E O R Jones'. The signature is stylized, with a large, looped 'E' and a distinct 'O' and 'R'.

**Mr E O R Jones**  
**Licensing Lead**