

In the Boston Borough Council Licensing Committee

In the matter of an application for a premises licence for Pilgrim's Local, 3-4 Market Place, Boston, Lincolnshire, PE21 6EQ, under the Licensing Act 2003 .

Witness statement Thiviyanthan Arulananthapillai

1. My name is Thiviyanthan Arulananthapillai, though I am sometimes referred to as Thivi. I am the applicant and proposed dps. [REDACTED]
2. [REDACTED]
3. I have entered into a conditional agreement for the lease to be assigned to me for the premises. The agreement is conditional on the licence being granted. The plan is that if the licence is granted I would look to acquire the freehold and together with Booker Premier Club franchise I would operate the convenience store.
4. I produce my basic cv of experience.
5. I own two convenience stores, one in Shrewsbury and one in Sheffield and I manage another premises in Morton, Gainsborough which is a Booker Premier Club franchise.
6. I hold the premises licences at Sheffield and Shrewsbury. I act as dps at those premises but should this licence be granted I will appoint a dps for each of the stores in Sheffield and Shrewsbury.
7. I have never had a licence reviewed or revoked or suspended. I have no previous convictions and my stores have not been prosecuted for any breaches of licence or for any criminal offences.
8. I am in the process of selling the business at Dalston Wednesbury.

9. I was granted the premises licence by Walsall borough council.
Once the sale is completed the licence will be transferred.
10. I became aware of the premises in Boston through the area manager at Booker Premier Club. I have applied for the licence and if granted will take over the business. The aim as I have stated is to acquire the freehold and operate under the Booker Premier Club franchise.
11. I expect to employ 3-4 staff including a manager. I will move to the area in setting up the business. It is my intention to attend the premises daily whilst building it up.
12. I sought advice from a licensing consultant in drafting the application and we have proposed extensive conditions as well as additional conditions from Mr Studd.
13. If there are any questions, I would be pleased to answer them.

The contents of this my statement are true to the best of my knowledge and belief.

Dated 23rd April 2026

Curriculum Vitae

Thiviyar Arulananthapillai



[REDACTED]



[REDACTED]

Personal Profile

Experienced and reliable shop owner and manager with over 10 years in the retail and off-licence sector. Proven track record in managing multiple licensed premises, ensuring compliance, increasing sales, and delivering excellent customer service. Holds strong leadership skills and extensive experience as a Designated Premises Supervisor (DPS).

Work Experience

Shop Owner / Manager (DPS)

2017 – Present

- Managed and operated 4 licensed premises across:
 - Shrewsbury
 - Sheffield (2 locations)
 - Morton, Gainsborough
- Acted as **Designated Premises Supervisor (DPS)** for all locations
- Responsible for:
 - Licensing compliance and legal regulations
 - Staff supervision and training
 - Stock control and supplier management
 - Financial management and daily operations
 - Customer service and sales growth

Shop Manager – Dalston Wednesday Off Licence

2023 – Present

- Managed day-to-day operations of the off-licence shop
- Ensured full compliance with licensing laws and regulations
- Supervised staff and handled rota management
- Maintained stock levels and supplier relationships

- Delivered high standards of customer service and sales performance
-

Convenience Store Assistant

Faversham, Kent | 2012 – 2017

- Worked in a busy convenience store environment
 - Handled customer service, cash transactions, and stock replenishment
 - Gained strong knowledge of retail operations and customer relations
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Off-Licence Shop Assistance (Petrol station)

June 2012 – 2017

- Developed experience in alcohol retail and licensing requirements
 - Assisted in daily shop operations and customer service
-

Education

- 
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Key Skills

- Premises licence management
 - Designated Premises Supervisor (DPS) experience
 - Retail and shop management
 - Staff leadership and training
 - Stock control and merchandising
 - Customer service excellence
 - Cash handling and financial management
-

Additional Information

- Strong understanding of UK retail and licensing laws
- Experienced in managing multiple shop locations
- Reliable, hardworking, and flexible

PILGRIM'S LOCAL

Version 1.0

Consultants Report

COMPLETELICENSING.UK



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A

Biographies



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ADRIAN STUDD

Director of Strategic Licensing and Public Safety

“Dedicated to ensuring safety and compliance, from the London Olympics to iconic venues, with a legacy of reducing violence and enhancing community well-being.”



I retired from the Metropolitan Police on 2nd November 2012 after 31 years of service. From January 2012 until retirement, I served as Chief Inspector in charge of licensing for the London Olympic Games 2012. I led a team ensuring licensing compliance at all Olympic venues, including the Olympic Park, and managed associated events. Our efforts ensured safe and effective event delivery, positively impacting the MPS and the UK. I was awarded an Assistant Commissioners Commendation for this work.

Between January 2002 and January 2012, I worked as an Inspector and then Chief Inspector on the MPS Clubs and Vice Unit (now SCD9 Serious and Organised Crime Command). My responsibilities included supervising the licensing team, providing support for problematic licensed premises, and developing action plans to address licensing issues. I also supported Boroughs with evidence for review hearings.

I devised and implemented the MPS 'Safe and Sound' strategy to enhance customer safety at licensed premises, significantly reducing violent crime, gun crime, and serious violence.

From 2004 to 2008, I represented the MPS and ACPO licensing lead both in London and nationally. I developed key partnerships with industry, NGOs, and Government departments to improve standards at licensed premises. I participated in the British Institute of Innkeeping working party, helped develop national training for Door Supervisors, and implemented the Private Security Industry Act 2001 in London. I contributed to SEV legislation and provided evidence to the House of Commons Select Committee in 2009 on sexual entertainment premises.

I was involved with Best Bar None, a national accreditation scheme for safe licensed premises, and helped implement it in several boroughs. As a trained assessor for Best Bar None and Purple Flag, I contributed to safe, diverse, and accessible town centres. For five years prior to retirement, I was responsible for licensing the Notting Hill Carnival, Europe's largest street carnival. During this time, I helped reduce violence, illegal alcohol seizures, and unlicensed sales, and lowered alcohol-related violence.

Following retirement, I provide independent compliance support and advice for licensed premises and events. I have supported a range of venues on issues such as crime and disorder, street drinking, rough sleepers, and age-related product issues. I have also assisted high-profile clubs in London and provided expert witness evidence at local authority and appeal court hearings. Adrian is a member of the Association of British Investigators, which is working with the Law Society of England & Wales.

» **Contact Adrian:**
adrian@completelicensing.uk

SANDY TRACEY

Senior Licensing & Compliance Consultant

“I have built a strong reputation for providing professional, honest, and practical advice to businesses. I am excited to bring my experience and knowledge to Complete Licensing and to work alongside truly professional colleagues.”

I recently retired from Northamptonshire Police after completing 30 years of exemplary service as an officer. For 24 of those years, I served within the Metropolitan Police, where I held various roles, including investigating domestic violence, sexual offences, hate crimes, and protecting the most vulnerable victims. I also served on the Front Line in Lambeth and Battersea and undertook public order and ceremonial duties as a Mounted Officer.

From 2009 to 2018, I gained extensive experience as a Police Licensing Officer on Westminster Borough. I was responsible for overseeing license applications, conducting compliance visits, providing crime prevention advice, presenting at licensing hearings, compiling action plans, conducting enforcement actions, and providing pre-application advice for some of the world’s most prestigious premises. Notably, I provided significant pre-application advice for Annabel’s in Berkeley Square during its relocation in 2018 and advised The Criterion Group on a £400 million luxury hotel development in Leicester Square.

I also authored and implemented a Crime Scene Preservation and Use of Force training package for Westminster’s businesses. This training improved crime scene preservation, use of force confidence among door staff, and relations between venues and the police. My work earned me a Borough Commander’s Commendation for my commitment, professionalism, and meritorious service in reducing crime related to the Night-Time Economy.

In 2018, I transferred to Northamptonshire, where I served as the Licensing Officer for the west of the county, overseeing over 2,000 licensed premises, including those at Silverstone Race Circuit. My compliance and enforcement efforts in some of Northamptonshire’s more challenging venues were successful, and I represented Northamptonshire Police at License Review hearings.

I was also instrumental in implementing 30 ID Scanners in the county’s Night-Time Economy venues in partnership with the Police/Fire/Crime Commissioner’s Office and Scan Net. This initiative significantly reduced crime and disorder, earning me a Northamptonshire Police Fire and Crime Commissioner Commendation.

Over the years, I have built a strong reputation for providing professional, honest, and practical advice to businesses. I am excited to bring my experience and knowledge to Complete Licensing and to work alongside truly professional colleagues.

» **Contact Sandy:**
sandy@completelicensing.uk



RICHARD BUNCH

Principal Crime Prevention and Licensing Consultant

"I'm really enjoying being involved in licensing from 'the other side'. My years of experience mean I can prevent potential licensing issues with police and other authorities."



I retired from the police service in April 2016 after serving in both Sussex and Metropolitan Police Services. Upon retirement, I was issued a certificate of service recognising my exemplary career.

Throughout my three decades of service, I held various roles in both uniform and detective positions, including major crime branches and community policing. At the time of my retirement, I was a substantive sergeant responsible for the police licensing team in the City of Westminster. I also managed several departments as an acting Police Inspector.

I qualified as a divisional and major crime branch detective at the National Criminal Investigation Centre in Maidstone, Kent. Additionally, I became an Advanced Interviewer, Family Liaison Officer, Exhibits Officer, and Disclosure Officer. I have worked on Divisional Drug Squads, Sussex Police Corporate Development Department, Sussex Police Unsolved Crime Investigations, and the Metropolitan Police City of Westminster Homeless Unit. As a qualified Key Decision Maker on CPS Charging Standards, I worked for two years at the country's busiest custody centre at Charing Cross Police Station. Following this, I served as the Crime Operations Manager for the Oxford Street, Regent Street, and Bond Street crime team at West End Central Police Station. During this period, I co-authored Operation Blizzard, a policing initiative for the busy autumn nights and Christmas period in London's West End. This initiative, designed to support the West End Business Improvement Districts (BIDs), was successful in reducing crime and disorder and was embedded in the Mayor of London's policing plan.

My final role was as Licensing Sergeant for the City of Westminster, working in partnership with the City of Westminster Licensing Authority. I was responsible for over 6,500 licensed premises, gaining extensive knowledge in licensing issues, crime and disorder within premises, reviews, and problem-solving through a partnership approach.

During my service in Sussex Police, I worked with licensed premises in towns, villages, and larger coastal towns and cities. I received two commendations for bravery and a merit for assisting the Metropolitan Police in recovering a kidnap victim while serving with the Major Crime Unit in Sussex Police. Richard is a member of the Association of British Investigators, which is working with the Law Society of England & Wales.

Contact Richard:
richard@completelicencing.uk



B

Senior Consultants
Overview Report



**COMPLETE
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PREPARED IN ACCORDANCE WITH SECTION 182 GUIDANCE OVERVIEW OF PREMISES AND APPLICATION

1. This overview is based on reports that have been prepared by Complete Licensing consultants Sandy Tracey and Richard Bunch. Sandy Tracey compiled her report having conducted observations in the Boston Town Centre area and inspected the premises on the evening of Monday the 20th April 2026. The analysis of crime and ASB in the town centre area was compiled by Richard Bunch from crime statistics and other information available from public sources. The statements of expertise for these individuals are attached.
2. Complete Licensing have been instructed in connection with the application for a Premises Licence by Mr. Thiviyanthan Arulananthapillai. The application is for a premises Off- Licence for the existing Pilgrim's Local Convenience Store in Market Square. The store currently operates without the benefit of a premises licence and it is proposed that if successful the business will be taken over by the new owner/operator and continue as a convenience store with off – licence from 08.00 hours to 23.00 hours.
3. Complete Licensing has been instructed to identify any additional issues that may be caused in the vicinity by the granting of an Off-Licence for the premises and, should any issues be identified, to consider if these can be managed through Conditions on the licence to ensure that the premises promotes the Licensing Objectives to a high standard. If it is considered that any issues that have been identified cannot be adequately managed through the use of Conditions this will also be stated.
4. While the premises is currently operated as a convenience store it is not subject to the rigors of the licensing regime, therefore conclusions based on the current operation are of limited value when considering how the premises will operate moving forward.



5. The applicant for the licence is a personal licence holder and has confirmed that if successful in the application he will employ a personal Licence Holder to operate the premises as the DPS and will change the staffing and operation of the premises to reflect the additional responsibilities of running a licensed premises.

6. Crime figures and crime analysis for the area are produced by the police in their report who also make recommendations based on their analysis of those statistics. Complete licensing has commissioned and experienced retired police officer to research the statistics publicly available in order to produce an independent assessment of the issues in the Market Square and the vicinity and to consider what, if any, Conditions would be required to mitigate those issues.



EXPERT REPORTS

7. The report of Sandy Tracey highlights that the premises is currently a large convenience store that is clean and well presented. It is located in the busy Market Square which is a focal point in the town centre and therefore is busy with shoppers and others including school children. There is seating around the Square that was being used for socialising but no street drinking or ASB was seen. There are no other Off-Licences in the vicinity although there are Licensed premises in the form of Pubs and restaurants.
8. Sandy Tracey identified a small number of issues with the current operation as a convenience store. These are issues that can be addressed and managed with the proposed change in ownership and management of the premises and with staff training. As this is a new application there is also the opportunity to attach any Conditions that are considered to be necessary to ensure the premises supports the Licensing Objectives moving forward. The Conditions proposed on the application form a comprehensive list and I recommend they are attached to the Licence if granted.
9. Consultant Richard Bunch notes that the area is covered by a PSPO (Public Space Protection Order for alcohol) but there is no CIZ (Cumulative Impact Zone) in place. A PSPO is aimed at individuals and in this case specifically at preventing a person from drinking alcohol in a public area and surrendering the alcohol when requested. It does not deal with the availability of alcohol in that area. The alcohol being consumed could have been purchased anywhere, therefore the addition of a well-run off-licence in that area would not necessarily have a negative impact.
10. A CIZ is specifically aimed at preventing the Cumulative Impact of a large number of licensed premises in an area and could be used where it is considered that any additional licensed premises would be detrimental to the promotion of the licensing objectives. It may be more appropriate to implement a CIZ in this area.



11. Richard Bunch conducted an analysis of Crime and Disorder in the area from the publicly available statistics on the police.uk website. This analysis highlights that the hotspot closest to the premises shows that from September 2025 to February 2026 (6 months) a total of 111 offences has been recorded. The highest number of these is shoplifting at 51, followed by other crime at 25, violent and sexual offences at 15 and offences of anti-social behaviour at 10. In this hotspot ASB offences accounts for 11.1 % of the total offences recorded.



SUMMARY

12. I have considered the evidence supplied by independent Licensing experts that includes the afternoon and evening observations in the Town Square and the existing shop, and the Complete Licensing crime analysis from the *police.UK* website. I have also considered the evidence provided by the local police and Authority in their submission.
13. The premises currently trades as a convenience store and sells a selection of food items and household goods. It caters for shoppers during the day and evening as well as school children after school buying snacks. It appears to be a community resource that is well used through the day by local people and currently does not generate crime and disorder or other concerns for police.
14. Some shortcomings are identified in the current operation; these are not related to alcohol licensing and can be addressed by the new owner while implementing the other changes required to support the Licensing Objectives if the licence is granted.
15. Police concerns highlight ASB and drunken behaviour in the Town Square. The evidence provided at 'Appendix F- Additional' shows that the ASB and Drunkenness in the Town Square, Town East and Town West gradually increases during the evening and peaks between 22.00 and 23.00 hours and then between 01.00 and 02.00. This is to be expected in a town centre when nearby pubs and Bars close and customers leave; this would not be affected by the proposed off licence premises that will close at 23.00 hours.
16. Evidence provided by police and authority refers to the positive impact that measures such as the introduction of Town Marshalls and the PSPO for alcohol have had in reducing street drinking and ASB, this is to be applauded. Through the PSPO these enforcement measures are directed at individuals behaviour, irrespective of where the alcohol is purchased. It is by no means clear that a well-run convenience store selling alcohol, professionally managed and with suitable Conditions, would have a negative impact on the town centre or adversely affect these successes.



17. There are measures, such as the marking of alcohol cans and bottles, which can be used to identify where alcohol is purchased enabling the authorities to tackle the root cause, the premises supplying the alcohol to problem drinkers.
18. The representations also refer to 'street drinking' and give an example of smokers at on-licensed premises being permitted to take their drinks into smoking areas. Issues such as this and others driven by on-licensed premises can be controlled through the use of Conditions on licences to, for example, prevent smokers taking their drinks outside when smoking.
19. The analysis by Richard Bunch shows that while there is ASB in the town centre hotspot it does not make up a large part of the overall crime accounting for 11.1 % of total recorded crime.



CONCLUSION AND RECOMMENDATIONS

20. Having considered the representations from all the parties it is my opinion that with the appropriate partnerships and Conditions attached to the licence this application can be granted, giving an additional resource to the local community without adding to existing street drinking and ASB or having an adverse effect on the licensing objectives.
21. The application includes a comprehensive list of Conditions in line with the Authorities current model conditions and I recommend these are adopted and attached to the licence. In particular I recommend:
- The premises licence holder collaborating with police and local authority on a Community Alcohol Partnership aimed at promoting responsible alcohol sales and in particular directed towards the protection of children and young persons.
 - The appointment of a DPS who is at the premises on a regular basis, has day to day control to enable any issues to be identified at an early stage and work with local police and Street Marshalls to address them.
 - Bottles and Cans are indelibly marked so they can be identified and appropriate action taken should they be confiscated while enforcing the PSPO.
 - The existing CCTV system is upgraded to ensure it covers the whole premises, stores footage for 28 days and there is a staff member on duty at all times who is able to download images.
 - The use of Challenge 25 to prevent underage sales.
 - No beers, lagers, ciders or similar products exceeding 6.5% ABV shall be stocked or sold.



- Ensuring at least 75% of windows facing into the retail area are clear from signage, decoration, or obstruction giving a clear view inside the premise.
- Regular cleaning and staff visibility outside the premises together with signage highlighting the existing PSPO to deter individuals loitering and ensure the external area is clean and orderly.

**Adrian Studd,
Senior Licensing Consultant.**



EXPERT'S DECLARATION (CIVIL CASES)

I Adrian Studd declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
 - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
 - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
 - I may be required to attend Court and/or Licensing Committee to be cross-examined on my report by a cross-examiner assisted by an expert;
 - I am likely to be the subject of public adverse criticism by the judge if the Court and/or Licensing Committee concludes that I have not taken reasonable care in trying to meet the standards set out above.
12. I have read Part 35 of the Civil Procedure Rules, the accompanying practice direction and the Guidance for the instruction of experts in civil claims and I have complied with their requirements.
13. I am aware of the practice direction on pre-action conduct. I have acted in accordance with the Code of Practice for Experts.

STATEMENT OF TRUTH

I confirm that I have made clear which facts and matters referred to in this report are within my own knowledge and which are not. Those that are within my own knowledge, I confirm, are true. The opinions I have expressed represent my true and complete professional opinions on the matters to which they refer.

DISCLAIMER

This report was completed by Complete Licensing Limited based on a defined programme of work and terms and conditions agreed with the Client. The report has been prepared with all reasonable skill, care and diligence within the contract terms with the Client, considering the project objectives, the agreed scope of works, prevailing site conditions and the degree of manpower and resources allocated to the project. Complete Licensing Limited accepts no responsibility whatsoever, following the issue of the report, for any matters arising outside the agreed scope of the works. This report is issued confidentially to the Client and Complete Licensing Limited, which has no responsibility whatsoever to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk. Unless specifically assigned or transferred within the terms of the agreement, Complete Licensing Limited retains all copyright and other intellectual property rights on and over the report and its contents.





C

Compliance Inspection Report



**COMPLETE
LICENSING**

PREPARED IN ACCORDANCE WITH SECTION 182 GUIDANCE COMPLIANCE INSPECTION REPORT

Premises: Pilgrim's Local Convenience Store

Address: 3-4 Market Place, Boston, Lincolnshire, PE21 6EQ

Date of Visit: Monday 20th April 2026

Time of Visit: 12:00 hrs to 13:00 hrs

Inspecting Officer: Sandy Tracey (on behalf of Complete Licensing)

1. PURPOSE OF VISIT

The purpose of the visit was to conduct a pre-licensing inspection in line with the Licensing Act 2003 and the statutory guidance issued under Section 182, in support of an application for a premises licence.

2. BACKGROUND

I am instructed that the current shop is owned and operated by the current operator. The applicant and proposed licence holder has a conditional agreement to take over the lease of the shop should a premises licence be granted. If the licence is not granted the intention is for the applicant to walk away from the premises.

[REDACTED]. Unfortunately, [REDACTED] the applicant was not able to meet me on site and it was necessary to conduct the meeting over the telephone. The current premises is operated by the current owner who I am instructed will have nothing to do with the business going forward should the premises licence be granted.

2. PERSONS PRESENT

- The current owner was not present but a staff member who identified himself as [REDACTED] was the only person present.
- The proposed Premises Licence Holder (PLH) was not present at the premises but was contacted via telephone during the visit.
- The current owner was also contacted by telephone.



3. GENERAL DESCRIPTION OF PREMISES

The premises is a large convenience store located within a busy market square. It benefits from a single entrance and exit point and has a substantial internal retail area. At the time of inspection, the premises was not licensed to sell alcohol.

The premises was observed to be clean, well presented, and adequately lit both internally and at the entrance. Fire exits were clearly marked with appropriate signage.

4. EXTERNAL ENVIRONMENT

Observations were conducted outside the premises. There are no other off licensed premises in the vicinity of the Market Square. The market square was busy with shoppers and numerous individuals loitering in the vicinity. When spoken to, some individuals identified themselves as Romanian residents and were unwilling to engage with me. Many were sat in the market square, but none were seen in possession of alcoholic drinks. The area is predominantly a large-scale farming and agricultural environment that employs migrant workers.

During the inspection, several school children in uniform entered the premises. All were well behaved and presented no issues of concern.

The location is therefore considered to have moderate footfall with a mixed demographic, including young persons and individuals who may be at risk of street drinking, especially into the evening.

5. LICENSING OBJECTIVES ASSESSMENT PREVENTION OF CRIME AND DISORDER

- A CCTV system is currently installed and operational, it currently stores footage for 28 days (untested).
- The staff member present was unable to access or operate the system.
- I understand that this will be addressed should the premises licence be granted and the business transferred to the applicant. The applicant is aware the cctv system will need to be upgraded and training will be addressed with his new staff should the licence be granted and he takes over. This presents an initial concern in relation to immediate compliance



with expected licensing conditions (31 days storage and must be accessible by a staff member whilst the premises are open). However, this should be able to be rectified within a short period of time.

PUBLIC SAFETY

- Adequate lighting was observed internally and externally.
- Fire exits and signage were compliant.
- No first aid provision was available on site, which should be addressed.

PREVENTION OF PUBLIC NUISANCE

- Some loitering was observed outside the premises, though no disorder or street drinking was evident at the time.
- The proposed conditions include measures to monitor and discourage such activity.

PROTECTION OF CHILDREN FROM HARM

- School children were present during the visit but were well behaved.
- The applicant has proposed robust Challenge 25 measures and ID requirements.

6. DISCUSSION WITH APPLICANT

A detailed telephone conversation was held with the applicant. The applicant demonstrated an understanding of licensing responsibilities and confirmed that the grant of a premises licence is a condition of the business purchase proceeding.

The applicant has offered a comprehensive set of conditions within the operating schedule, which are consistent with the promotion of the four licensing objectives. We went through each condition in detail and requirements/expectations were explained in detail.

7. SUMMARY OF PROPOSED CONDITIONS

The applicant has volunteered conditions including (but not limited to):

- Restriction on high-strength alcohol (no sales above 6.5% ABV)
- No sale of single cans/bottles (except larger bottle formats)



- Controlled storage of spirits behind the counter
- Robust CCTV requirements (31-day retention and trained staff access)
- Incident and refusals registers
- Staff training and refresher training every six months
- Challenge 25 policy with acceptable forms of ID
- Measures to prevent proxy sales and street drinking
- No irresponsible promotions or external alcohol advertising
- Monitoring of external areas to discourage loitering

These conditions align with best practice and Section 182 Guidance.

8. CONCERNS IDENTIFIED

- Staff member on duty unable to operate CCTV system but new staff will be engaged
- No first aid provision currently available
- Language barrier may impact effective implementation of licensing controls unless addressed through training and supervision. I understand this will be addressed with new staffing if the licence is granted.
- The new PLH currently resides in [REDACTED]. I am instructed that the plan is for him to move with his family to near the premises so that he can attend the premises and be present on a daily basis. He also plans to employ a new member of staff as a manager who will hold a Personal Licence. The member of staff/manager will live in the accommodation above the shop.
- The applicant does hold a Personal Licence.

9. CONCLUSION

- The premises is structurally suitable for licensing, being clean, well maintained, and appropriately laid out. The applicant has proposed a robust and comprehensive set of conditions which, if properly implemented, should promote the licensing objectives. It is further recommended that:
 - CCTV system is reviewed to ensure compliance.
 - All staff receive appropriate training, particularly in CCTV operation and licensing responsibilities



- A first aid provision is introduced
- Consideration is given to ensuring sufficient English language competency among staff or appropriate supervision arrangements
- A manager involved in the day to day running of the premises will hold a personal licence and be authorised to sell alcohol on behalf of the owner
- That there be at least two staff members on duty whilst the premises are open, with one member of staff monitoring the outside area;
- A personal licence holder can be present at all times the premises is open for the sale of alcohol.
- That no external advertising of alcohol shall be displayed and the shopfront/windows will remain at least 75% clear;
- Waterproof labels with the shop name and address and or licence number shall be attached to cans and bottles of beer, lager and cider;
- A notice advising customers of the PSPO and its effect shall be prominently posted at the exit;
- and that the operator engage with any relevant local initiatives relating to the public spaces protection area and local nuisance issues.

Subject to the above, there are no overriding concerns that would prevent the granting of a premises licence.

Report completed by:

Sandy Tracey

On behalf of Complete Licensing

Date: 20th April 2026



EXPERT'S DECLARATION (CIVIL CASES)

I Sandy Tracey declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
 - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
 - the Court and/or Licensing Committee may direct that following a discussion between the experts that a statement should be prepared showing those issues which are agreed, and those issues which are not agreed, together with a summary of the reasons for disagreeing;
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STATEMENT OF TRUTH

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C

**Crime Statistics
Report**



**COMPLETE
LICENSING**

PREPARED IN ACCORDANCE WITH SECTION 182 GUIDANCE CRIME STATISTICS REPORT

1. BACKGROUND & INSTRUCTION

- 1.1 I have been instructed by the owners/operators and the representing legal team to produce an expert witness report to assist with the application for a premises licence at a convenience store known as Pilgrims Local, 3-4 Market Place, Boston, Lincolnshire, PE21 6EQ.
- 1.2 This report will form part of a package of evidence and information for consideration of the licensing sub-committee for that area. This report is to be used in conjunction with that of the reports produced by my colleagues at Complete Licensing Limited.
- 1.3 I will be reporting on and making comments on the following key areas following the representation made by Police and the Local Authority:
 - Local Policing Priorities
 - Local Crime Figures
 - Highlights of crime figures
 - Premises contribution to local crime figures
 - Premises Inclusion on Policing Priorities
 - Revue of overall crime figures
 - Experts' opinion on the impact the premises is likely to have on crime, disorder and public safety
 - Expert opinion on the premises successfully promoting the licensing objectives.



2. POLICING PRIORITIES

- 2.1 The Pilgrims Local premises is located in Boston Town centre; it falls under Lincolnshire Police Boston Town Centre Policing Team.
- 2.2 All the information that I am about to provide has been taken from the Police UK website. The information on this website is taken from the data submitted by the force responsible for that particular area. This includes crime figures and statistics and accurate crime hot spotting.
- 2.3 You will see below I have taken the Policing priorities as recorded on the Police UK website. It appears that the listed priorities have not been reviewed or updated for a number of months now. Unusually, there are no detailed action plans as you would expect to see in a Police area of this nature.



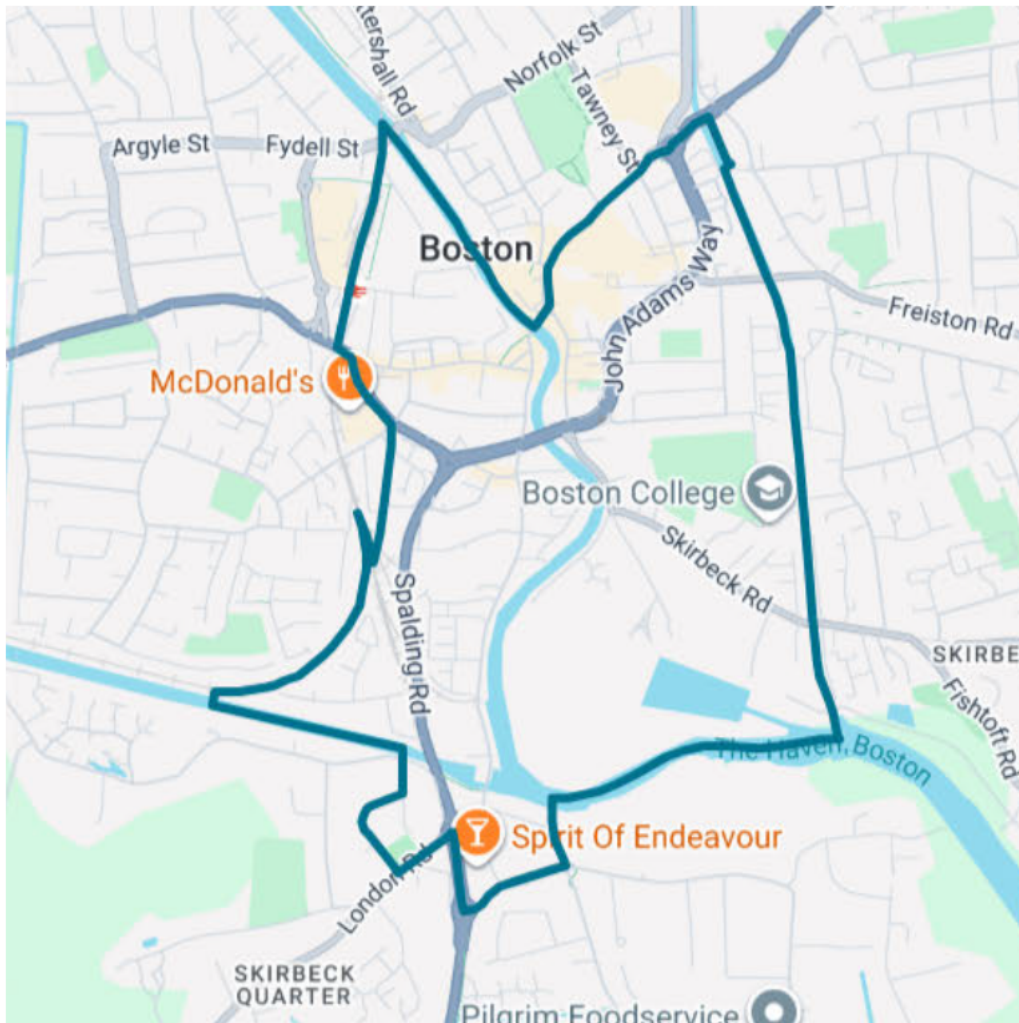


Image 1 : Map of Boston Town Centre Police Area



Your local policing team

About us

Your team

Policing priorities

Meetings and events

Priority:

Action taken:

Combating vehicle nuisance and anti-social behaviour
(particularly loud exhausts and speeding)

No update available

Issued 31 October 2025

Tackling street drinking and drug use

No update available

Issued 01 September 2025

Image 2 – Policing Priorities as recorded.



3. CRIME FIGURES – BOSTON TOWN CENTRE POLICE AREA

- 3.1 The available data is only shown to February 2026. Again, this is unusual for the figures to be this far behind. I would normally see figures to be available to the previous month. However, we are able to see figures accurately recorded for the previous month and rolling 12 months.
- 3.2 The first thing to note is the clear increase and spike through the spring and summer months. This is not unusual through the summer months and longer warmer days when the public are out and about longer through the daylight hours.
- 3.3 The overall figures for the area are comparable to like towns and Policing areas across the country and of a type you would expect to see.
- 3.4 Taking into consideration the rolling 12 month and 3-year crime figures, the level of offending and the recorded crime types have remained consistent.
- 3.5 If you look at the crime hotspot maps produced and the hot spot location as highlighted on the maps from September 2025 to February 2026 (6 months) a total of 11 offences have been recorded. The highest of these is shoplifting at 35 or 31.53%. The next highest are crimes of violence at 15 recorded offences or 13.5%. Only 8 offences of anti-social behaviour or 7.2%.
- 3.6 The Police objection is based on the Public Space Protection Order which covers a very large area of Boston. The PSPO was enabled under the Anti-Social Behaviour Crime and Policing Act 2014 to give local authorities powers to keep public areas safe and clean.
- 3.7 The primary aim of PSPOs is to ensure public spaces can be enjoyed without interference from anti-social behaviour. They are not intended to restrict responsible use of public areas or prevent social interactions, but rather to address



persistent issues that negatively impact communities. Examples include controlling alcohol consumption, requiring dogs to be on leads, or restricting certain behaviour in sensitive areas.

3.8 I acknowledge that the council Licensing policy adopted 10th November 2025 makes reference to the PSPO area. Paragraph 35 specifically addresses the order to tackle the problem of street drinking and associated crime and nuisance in Boston Town Centre. The policy seeks to address the issues by measures to be adopted by retailers to mitigate any detrimental impact on the Licensing objectives, it suggests appropriate and proportionate conditions. The council specifically state under paragraph 14.5 that there are no policies in relation to cumulative impact adopted.



Image 3 – Crime Figures for February 2026





Image 4 – Rolling Crime Figures for Rolling 12 months and type for February 2026

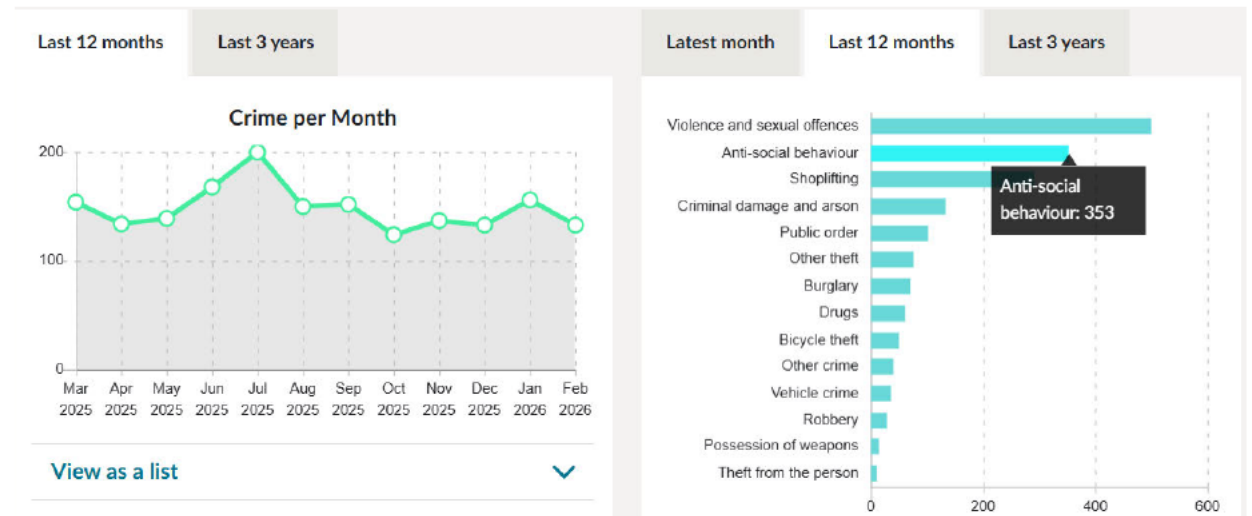


Image 5 – Rolling 12 months crime figures and by type



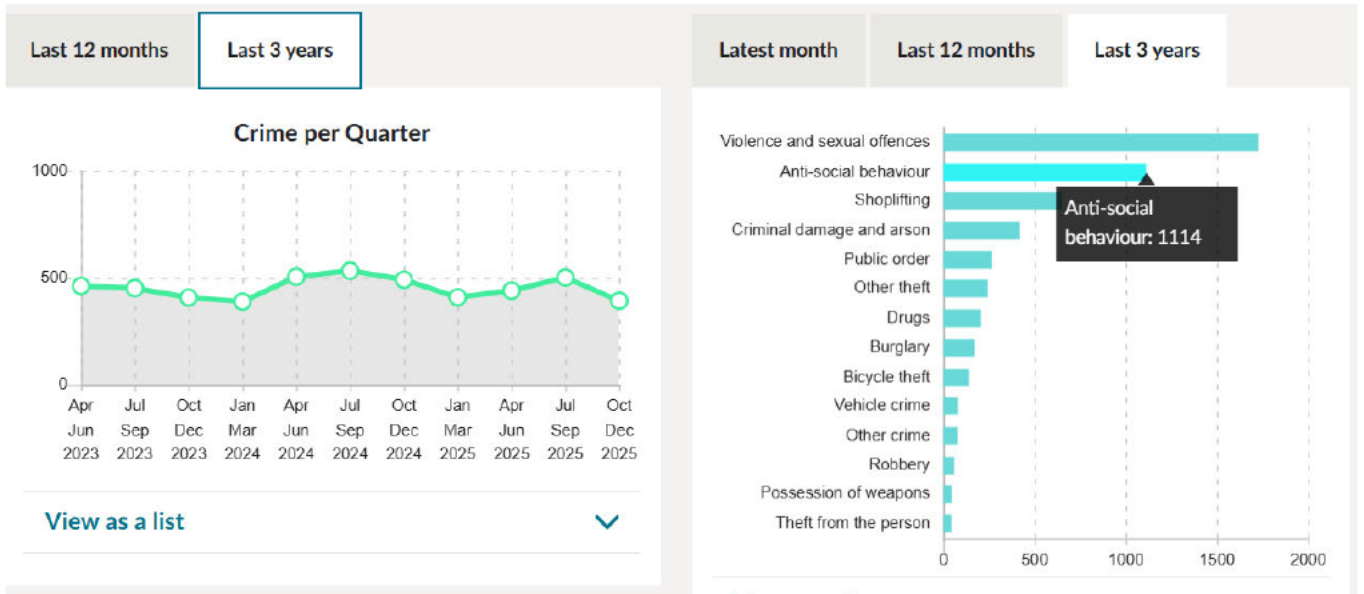


Image 6 – Rolling 3 year crime figures and by type



Image 7 – Satellite Image of Pilgrims Local location



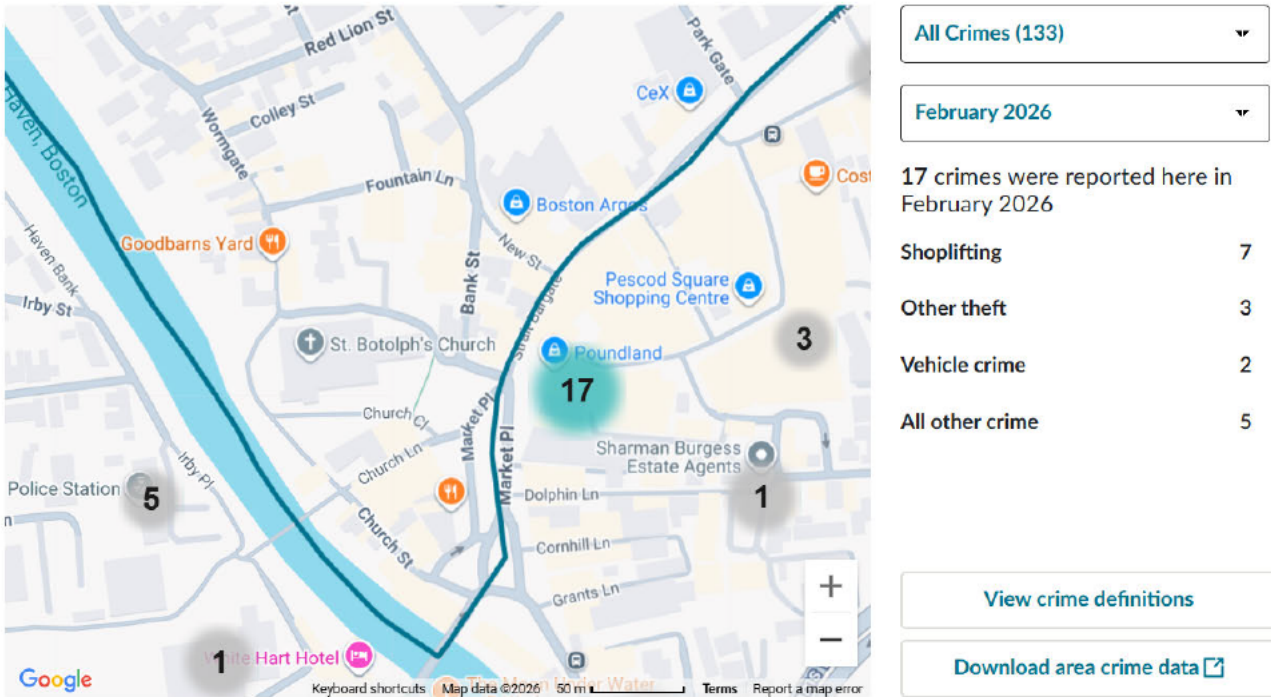


Image 8 – Crime hotspots nearest areas to Pilgrims Local location – February 2026

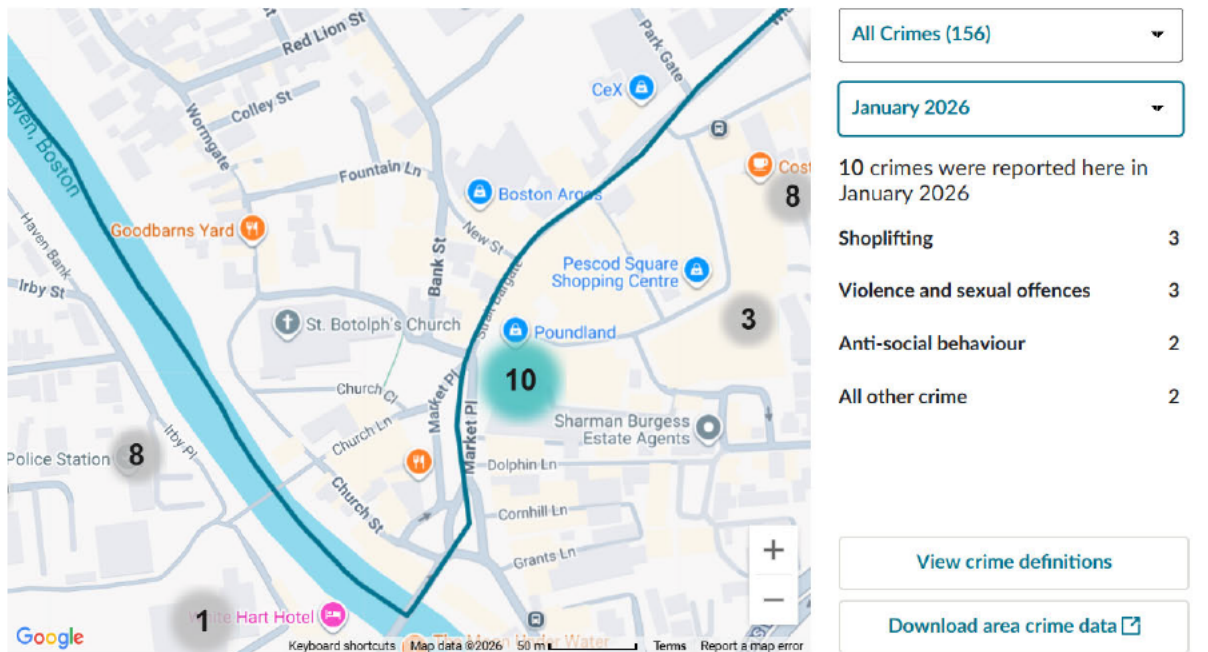


Image 9 – Crime Hotspots nearest areas to Pilgrims Local location – January 2026



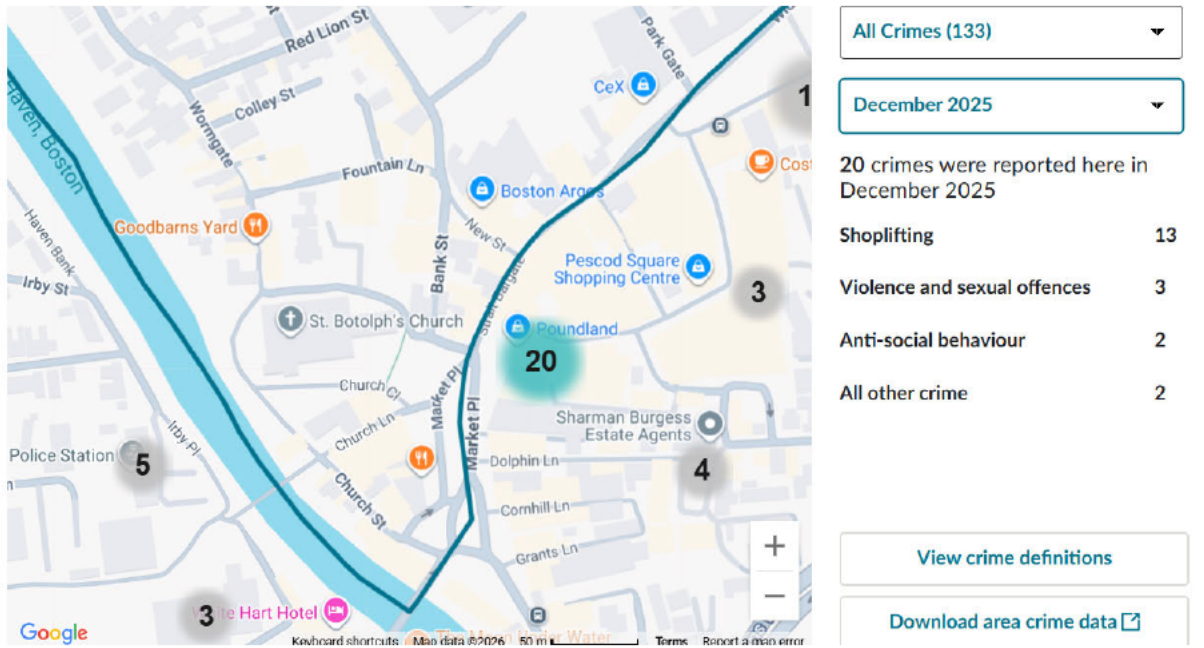


Image 10 – Crime Hotspots nearest areas to Pilgrims Local location – December 2025

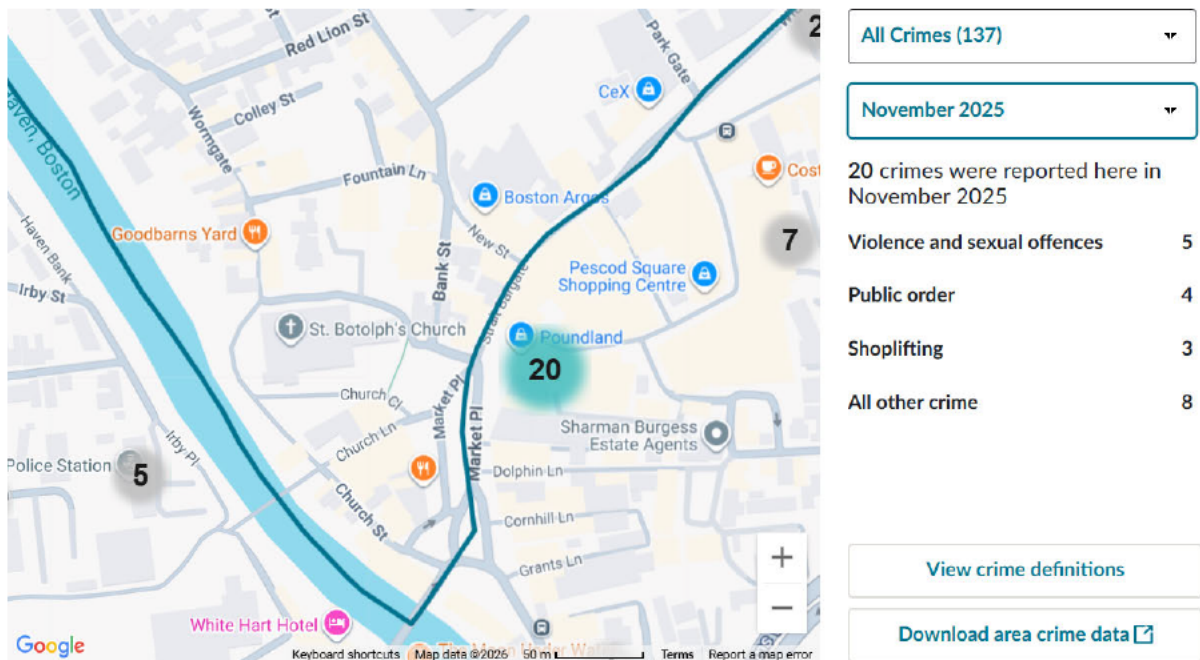


Image 11 – Crime Hotspot nearest areas to Pilgrims Local location – November 2025



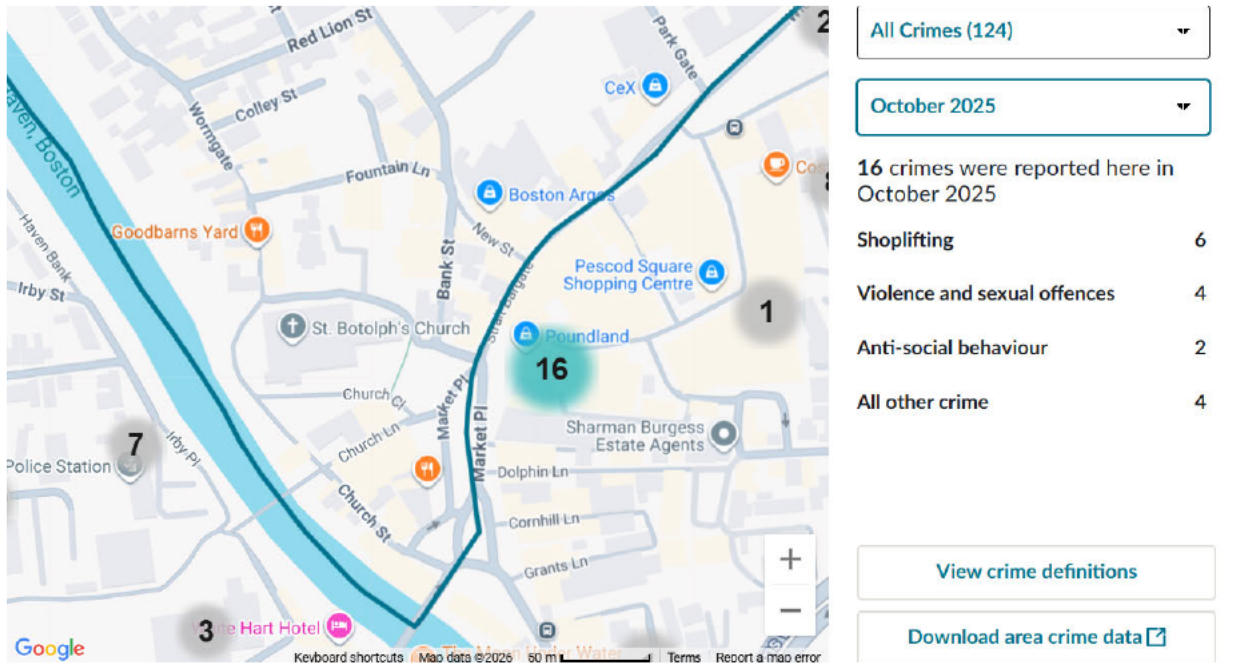


Image 12 – Crime Hotspots nearest area to Pilgrim's Local location – October 2025



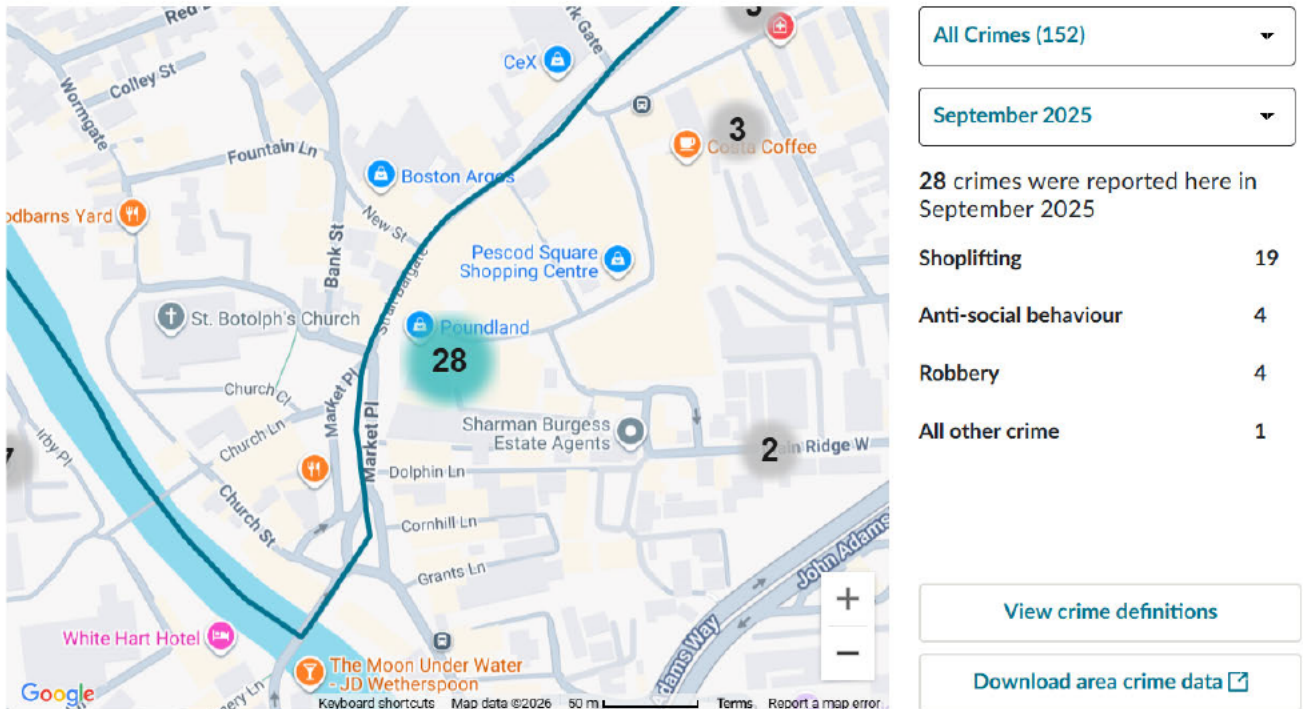


Image 13 – Crime Hotspots nearest area to Pilgrim's Local location – September 2025



4. CONCLUSION

- 4.1 I have been instructed to consider the impact of the premises on local crime and disorder and public safety.
- 4.2 Like many other towns in the country this will undoubtedly have it's fair share of public houses, bars, restuarants, independent off-licenses, convenience stores and supermarkets that hold a premises licence for the sale of alcohol.
- 4.3 The Police will undoubtedly make a representation against this premises holding a premises licence for the sale of alcohol. There is a presumption that granting such a licence will negatively impact the Police and other emergency services.
- 4.4 I note the Police have produced a document detailing ASB and street drinking incidents in both their rural and town centre responsibilities. From my experience these figures will not be adversely affected in anyway with the granting of a premises licence of this nature. It is highly unlikely that a small off-licence and convenience store of this nature will draw additional numbers of rough sleepers or street drinkers into the town centre. It is looking to gain a share of the current available market and make the business viable. The Police have not produced any evidence the premises is currently a crime generator at present.
- 4.5 There is no evidence from the Police that the Local Authority licensing policy that was introduced approximately 5 months ago is not working. The policy refers to conditions to be considered on premises licences and there is no evidence from the police that such conditions are not working in mitigating issues. No figures are produced comparing premises without such conditions against premises with such conditions.



4.6 Section 182 Of the Licening Act clearly states:

The Licensing Act 2003 should be delivered with a partnership approach. Each application should be considered on an individual basis and whether it will promote the licensing objectives.

4.7 The premises has been operating for a period of time. From the information I have avaiable to me there is no evidence form the Police or Local Authority it is a current issue and crime generator. Whilst the operator would change should a premises licence be granted, there is no evidence that the licence holder will not comply with any conditions imposed, and there is no evidence that the policy suggested conditions would not be effective if imposed.

4.8 Should the premises fail to promote the licensing objectives there is always the opportunity for the Police and local authority to review the licence and vary the conditions or seek a revocation.

5. CONSIDERATIONS FOR LICENSING SUB-COMMITTEE:

5.1 The owners and operators have approached a team of licensing professionals to advise and support them.

5.2 I am confident that with the correct operating policies in place, these premises will operate to the highest standards as a convenience store and off-licence.

5.3 I do not believe in my professional opinion a premises of this nature will have an adverse affect on the emergency services or become a crime generator.

5.4 There is no culmalitive impact zone in place.

5.5 The granting of this licence with the conditions set out in the licensing policy will not have a detrimental impact on the Public Space Protection Order.



- 5.6 The policy was adopted very recently and there is no evidence that the Licensing Authority policy does not work.
- 5.7 The granting of this licence will not draw a huge additional footfall to the area and in-turn negatively impact on the town centre.
- 5.8 The premises is looking to have the opportunity to gain a share of the local market and support the viability of the business.
- 5.9 Mechanisms are available to ensure the licencing objectives are promoted. Variations on conditions and review and ultimately revocation are available.
- 5.10 In my experience, taking into consideration the crime figures produced, the evidence to support the objection from the police and the overall business profile of the premises and the licence applied for the Sub-Committee can feel confident in granting this licence subject to conditions. Such a decision would be fair and proportionate in the circumstances.

Richard Bunch
Crime & Disorder Consultant
Complete Licensing Limited



EXPERT'S DECLARATION (CIVIL CASES)

I Richard Bunch declare that:

1. I understand that my duty in providing written reports and giving evidence is to help the Court and/or Licensing Committee and that this duty overrides any obligation to the party by whom I am engaged or the person who has paid or is liable to pay me. I confirm that I have complied and will continue to comply with my duty.
2. I confirm that I have not entered into any arrangement where the amount or payment of my fees is in any way dependent on the outcome of the case.
3. I know of no conflict of interest of any kind, other than any which I have disclosed in my report.
4. I do not consider that any interest which I have disclosed affects my suitability as an expert witness on any issues on which I have given evidence.
5. I will advise the party by whom I am instructed if, between the date of my report and the trial, there is any change in circumstances which affect my answers to points 3 and 4 above.
6. I have shown the sources of all information I have used.
7. I have exercised reasonable care and skill in order to be accurate and complete in preparing this report.
8. I have endeavoured to include in my report those matters, of which I have knowledge or of which I have been made aware, that might adversely affect the validity of my opinion. I have clearly stated any qualifications to my opinion.
9. I have not, without forming an independent view, included or excluded anything which has been suggested to me by others, including my instructing lawyers.
10. I will notify those instructing me immediately and confirm in writing if, for any reason, my existing report requires any correction or qualification.
11. I understand that;
 - my report will form the evidence to be given under oath or affirmation;



- questions may be put to me in writing for the purposes of clarifying my report and that my answers shall be treated as part of my report and covered by my statement of truth;
 - the Court and/or Licensing Committee may at any stage direct a discussion to take place between experts for the purpose of identifying and discussing the expert issues in the proceedings, where possible reaching an agreed opinion on those issues and identifying what action, if any, may be taken to resolve any of the outstanding issues between the parties;
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END



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