

# **APPENDIX C**

# Exeter City Council – Licensing Act 2003

## REPRESENTATION FORM

This representation is made about the premises to be licensed as detailed below:

Your full name	[REDACTED]
The name of the organisation / body you represent (if appropriate)	First Greater Western Limited
Postal address	Milford House, 1 Milford Street, Swindon, Wiltshire SN1 1HL
Email address	[REDACTED]
Contact telephone number	[REDACTED]

Name of the premises you are making a representation about	Zukis Express
Address of the premises you are making a representation about	2B The Crescent, Exeter Central Station, Queen Street, Exeter EX4 3SB

Your representation must relate to one of the four Licensing Objectives

<i>Licensing Objective</i>	<i>Yes Or No</i>	<i>Please detail the evidence supporting your representation or the reason for your representation. Please use separate sheets if necessary</i>
To prevent crime and disorder	Yes	Please refer to accompanying formal written statement provided by First Greater Western Limited
Public safety	Yes	Please refer to accompanying formal written statement provided by First Greater Western Limited
To prevent public nuisance	Yes	Please refer to accompanying formal written statement provided by First Greater Western Limited
To protect children from harm	Yes	Please refer to accompanying formal written statement provided by First Greater Western Limited

If you are making a representation against a new application or full variation, please suggest any conditions that could be added to the licence to remedy your representation (or other suggestions you would like the Licensing Sub Committee to take into account).	Not applicable
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Signed: [REDACTED]  
Please

Date: 17<sup>th</sup> February 2026

## NOTES

**If you are making a representation in relation to a 'new' premises or a 'full variation' please read the following notes:**

1. If you do make a representation you will be able to attend a meeting of the Licensing Authority's Committee and any subsequent appeal proceeding. If you do not attend, the Committee will consider any representations that you have made in your absence.
2. This form must be returned within the statutory period of 28 days following submission of a valid application to the Licensing Authority.
3. You may make a representation wherever you live in relation to the premises but your representation must be relevant.
4. Representations can only relate to the four licensing objectives.
5. Your representation will be passed to the applicant, to allow them the opportunity of addressing your concerns. Your representations will be published in the report available to the Licensing Committee, which will be publicly available.
6. Please return this form when completed to:

Licensing, Exeter City Council, Civic Centre, Paris Street, Exeter EX1 1JN

Alternatively, you can email it to [licensing.team@exeter.gov.uk](mailto:licensing.team@exeter.gov.uk).

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**If you are making a representation in relation to a 'minor variation' please read the following notes:**

1. If you do make a representation, you should be aware that the application will be determined by an Officer. There will be no hearing and there is no right of appeal.
2. This form must be returned within the statutory period of 10 working days following submission of a valid application to the Licensing Authority.
3. You may make a representation wherever you live in relation to the premises but your representation must be relevant.
4. Representations can only relate to the four licensing objectives.
5. Please return this form when completed to:

Licensing, Exeter City Council, Civic Centre, Paris Street, Exeter EX1 1JN

Alternatively, you can email it to [licensing.team@exeter.gov.uk](mailto:licensing.team@exeter.gov.uk).

## **GWR on licencing application for Zukis**

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Exeter Central is the gateway to the city for a lot of visitors and families. It is a family station and GWR has invested heavily in improving facilities for all travellers over the years recognising the vital role it plays in business and tourism to the city and wider area.

The station already experiences issues with disorderly behaviour and there is balancing act to the customer experience and perception older, younger and family groups needs with intoxicated customers, who have often felt the effects of alcohol after leaving local restaurants and taking advantage of the many bottomless brunch deals available near to the station which sees sustained drinking of alcohol from mid-morning onwards.

Some of our rail services are an hour apart, giving us concern that already intoxicated, waiting customers, will take advantages of nearby “off sales”.

There must be an understanding of the risks to the station and risks to the network from passengers becoming unwell, disorderly and lost due to excess alcohol consumption. Drunkenness already puts a lot of pressure on the few station staff working on an evening, there is no budget for more staff.

All arguments should be balanced along with the NHS England’s advice regarding the large spectrum of health risks to all individuals of binge drinking and the increased pressure that can create on local services and budgets, our concerns mainly reflect our dealings with individuals and groups with alcohol dependency and individuals and often large groups of chaotic alcohol usage who see drinking large quantities as an activity which often leads to issues in to the evening.

## Begging / Homelessness

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- Queen Street has a history of begging and homelessness, there are instances of rough sleeping in and around the station frontage impeding the passage of entry and exit to the station and nearby at Exeter Museum, usually the rough sleepers are found to be begging to passing traffic. This type of behaviour typically attracts alcohol and or drug use which we believe may invite others from within the city centre due to this late licence application. The only other available late off-licence locally to Queen Street is Newham Stores on South Street which is 24hrs and attracts individuals seeking alcohol for consumption on the streets, this is well documented with activity in the Cathedral Green and is supported by charities supporting through soup kitchens etc.

## BTP resource / GWR staffing

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- British Transport Police (BTP) are the principal responder for requests to assist when the call is made from staff at Exeter Central, this local team is small and under increasing pressures and demand. A wider force shortfall of funding against the backdrop of increasing railway crime doesn't make for a pretty picture.

<https://www.railmagazine.com/comment-landing-page/funding-cuts-risk-blunting-the-british-transport-police>

The local Exeter BTP team cover a large geographical area in the Devon area which means their ability to be in two places in any one time is severely restricted. The local Exeter BTP team is also not 24hrs, therefore after the late shift finish their cover comes from Bristol who themselves cover the whole of the southwest sometimes with just one officer on duty. Devon and Cornwall police have in the past been unable to attend anti-social events at the stations due to their own work demands and activities which statistically is increasing in the local area which has resulted in staff having to wait for BTP attendance presenting a risk or escalation. Exeter Crime Statistics

*The crime rate in Exeter is reported to be 60 crimes per 1,000 people for the 12-month period ending November 2025. The most commonly-reported crimes are violence and sexual offences, with a rate of roughly 30 reports per 1,000 daytime population. Exeter is ranked as the third most dangerous location under Devon & Cornwall Police's command, following Plymouth and Paignton.*

<https://www.police.uk/your-area/devon-and-cornwall-police/exeter-city-centre/?tab=CrimeMap>

The station itself has a small team and past 22:00 Monday to Saturday, and 18:00 Sundays is singled staffed alongside a contracted security individual. There are female colleagues at the station who cover the later shifts up until 01:10 and their responsibilities include keeping the station clean and safe for customers. Due to the planned location of a late licence premise this increases the chances of the public coming in to use the toilets and or wait in the station during periods of inclement weather, these likely increases will be natural changes over a period of time which presents risks for lone workers and or intoxication on station premises.

### **Justification for such a late finish (existing licenced premises in the area and a new bar opening in the station building)**

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- There are currently no late off-licence premises in the local vicinity to the station meaning presently alcohol can only be purchased from local bars or restaurants and or established retailers and we are concerned around the need for such a late requirement given such late-night venues already serve alcohol till midnight and beyond.

There is an established local Co-Op store located on Queen Street which has itself been victim to various issues such as shop lifting of alcohol and high-cost items such as meats. It is often the case that local homeless persons are found sitting outside begging to passing traffic casing an intimidating environment for all end users. The Co-Op has security now in store to act as reassurance and deterrence and the store itself is also captured by the on-street CCTV systems managed by the Exeter City Control room, the planned Zukis establishment is not covered by this scheme.

Given the crescent building up to late 2025 had a small part time bar (TaBac) and the impending reopening of the establishment by the Topsham Brewery on a more full-time basis, is there such a need or requirement for an off-licence given the proximity to the Co-Op and the dining quarters of the Guildhall and bars of Gandy Street? The newly opened Portal Pizza occupying the former Exploding Bakery premise adjacent to the planned late licence is also licenced now which potentially increase the number of premises serving alcohol from one to three is 12 months. The crescent building should be of mixed use which serves a mixed demographic of users and not been seen to be devaluing its setting with premises serving or opening until 1am in the morning. The off-licence is highly likely to attract those at such late times who are either homeless or in most cases likely dependent on alcohol to a degree.

## College Students

- The station has a high level of student use through the station Monday to Friday and in term holidays becomes more family traffic centric. We raise concerns around the availability of alcohol in what is a high traffic area where students may have greater exposure to alcohol and vaping products easier in such a small premises than the aforementioned established players who have robust protocols including Think 25 in place. Whilst we note that the premises will be small selling a range of different products it is still in our opinion that there is high likelihood of potential exposure that does not currently exist within such close proximity to the college settings on Queen Street.

The risks for such visible and easily accessible products should not be dismissed easily, given local authorities have the ability already to limit the amount of takeaways for food in proximity to schools and colleges this is also worthy of consideration given the potential exposure.

## Public Space Protection Order (PSPO)

- Queen Street itself sits within the PSPO area which is an coordinated agreement between Exeter City Council and Devon & Cornwall police that as per the wording from the Exeter City council website states.

*“Public Spaces Protection Orders (PSPO’s) were introduced as part of the Anti-social Behaviour, Crime and Policing Act 2014. PSPOs can be used to control behaviours which are having, or are likely to have a detrimental effect on the quality of life of those in the locality. PSPOs impose conditions or restrictions on people using that area.”*

<https://exeter.gov.uk/clean-safe-city/community-safety/safer-exeter/pspo/>

Given our concerns around the likely increase in individuals being drawn to the premises to seek alcohol late at night how can the granting of a premise licence be in keeping with the PSPO. Persons purchasing alcohol will be encouraged to sit in the crescent area to drink late at night, potentially loitering and littering the area or will move on to other surrounding areas such as Northernhay Gardens which has previously suffered issues around anti-social behaviour and or bring alcohol in to the station and on to train services for which station staff will have no jurisdiction over. The station and Queen Street itself is a city centre gateway and sees high levels of footfall which increases at weekends. Given there are numerous events in the city including football and rugby which both attract the consumption of alcohol how can it be plausible to offer such an opportunity for such drinking when local establishments have closed for the night or have

refused the entry of persons due to intoxication thus causing possible disturbances or anti-social behaviour within the PSPO area.

In 2024 Exeter City council introduced The Exeter Community Safety Team with its main purpose to act as part of a larger hotspot policing initiative across Devon and Cornwall. <https://inexeter.co.uk/community-safety-team/>

The team covers the city centre and acts at the ears and eyes of any anti-social events or intelligence and works closely with the local council and policing units. The Community Safety Team also enforces the Public Space Protection Order (PSPO), targeting issues such as street drinking and aggressive begging. With this in mind and as we outline we have yet to see active patrols along Queen Street to discourage current issues as outlined, how will the PSPO be enforced with the high likelihood of an increase in alcohol consumption in the crescent area to Exeter Central Railway Station. There seems to be an increasing amount of premises within Exeter which offer 'mini mart' style shopping experiences, in our humble opinion the idea of an additional late night off-licence conflicts with the idea of the PSPO given the enforcement of on-street drinking and or begging seems to be unchecked, the granting of the licence for Zukis would provide impetus to sell alcohol to passers by and or locals who as of right now do not have the opportunity which we believes keeps the local area including the station cleaner and importantly safer.

Exeter has been granted the Purple Flag status recognising the city is a safe place for a night out, this award recognises the hard work of businesses including licenced premises and many other stakeholders including transport providers. This award comes off the investment the local police force has made to policing the city centre including the introduction of PSPO orders to help deter unruly and antisocial behaviour. We recognise as a transport provider the confidence such schemes and awards can have to those visiting the city or thinking of doing so. GWR is signed up to the Exeter Safety of Women at Night (SWaN) charter recognising the role we play to help in the nighttime economy of Exeter and the safety of women and girls.

We set out our concerns based on issues we currently experience and those that we believe will occur if such a later licence is granted, we ask that careful consideration and weighting is placed to these concerns before any such application is granted.