

LICENSING SUB COMMITTEE A

Date: Thursday 2nd July, 2026
Time: 10.00 am
Venue: Spencer Room, Town Hall

AGENDA

1. **Welcome, Fire Evacuation and Recording of Meetings**

In the event the fire alarm sounds for more than 10 seconds attendees will be advised to evacuate the building via the nearest fire exit and assemble at the Bottle of Notes opposite MIMA.

Members of the public have the right to film, record or photograph public meetings. If you intend to do so, please advise the Chair of this intention. You may be asked to stop filming, photographing or recording a meeting if the Chair feels that the activity is disrupting the meeting.

2. **Apologies for Absence**

To receive any apologies for absence.

3. **Declarations of Interest**

Members are asked to declare any interests in the items under consideration and in doing so state:

(1) the type of interest concerned:

- *Disclosable Pecuniary Interest (DPI) or*
- *Non-Pecuniary Interest (including personal or prejudicial interest)*

(2) the nature of the interest concerned.

If any member requires advice on declarations of interests, they are advised to contact the Monitoring Officer in advance of the meeting.

4. **Licensing Act 2003 - Application for Premises Licence:
Cumberland Convenience Store, 57-59 Cumberland Road,
Middlesbrough, TS5 6PN** 5 - 66
5. **Any other urgent items which in the opinion of the Chair,
may be considered.**

Charlotte Benjamin
Corporate Director of Legal and Corporate Services

Town Hall
Middlesbrough
Wednesday, 24 June 2026

MEMBERSHIP

Councillors S Hill (Chair), P Gavigan and A Romaine

Assistance in accessing information

The documents referred to on this agenda may be downloaded from the Council's Website: [Committee structure | Middlesbrough Council](#)

Should you have any queries on accessing the Agenda and associated information, such as alternative formats, please contact Joanne Dixon / Claire Jones, 01642 729713 / 01642 729112, joanne_dixon@middlesbrough.gov.uk / claire_jones@middlesbrough.gov.uk

INFORMATION ABOUT MIDDLESBROUGH COMMITTEE MEETINGS

Venue Accessibility

All Committee Rooms are located on the first floor of Municipal Buildings (Town Hall). There is restricted disabled access to the first floor via a lift.

There is no on-site parking at Municipal Buildings. A map of town centre parking is attached below. A full map of town centre parking can be found on the Council's website: [Middlesbrough town centre parking plan - October 2025](#)



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**FOR THE CHAIR AND MEMBERS OF
THE LICENSING SUB-COMMITTEE
FOR 2 JULY 2026**

APPLICATION FOR A PREMISES LICENCE

Applicant: Keerththana Arulthas

Ref.No. 107261

Premises: Cumberland Convenience Store, 57-59 Cumberland Road, Middlesbrough, TS5 6PN

Application received: 8 May 2026

Licensable Activities applied for:

The Sale of Alcohol for consumption off the premises: -

Daily from 06.00 until 23.00

Full details of the application and accompanying operating schedule have been reproduced at Appendix 1.

1. Notification to Responsible Authorities:

The following Responsible Authorities have all received notification of the application:

Chief Constable	Planning Manager
Chief Fire Officer	Trading Standards Manager
Area Child Protection Group	Director of Public Health
Environmental Health Manager	Home Office (Immigration Enforcement)
(Public Safety and Public Nuisance)	Licensing Manager

2. Application advertised by the applicant: Teesside Gazette – 21 May 2026

3. Legislation

The Licensing Act 2003 requires the Licensing Authority to carry out its functions with a view to promoting the four licensing objectives:

- The Prevention of Crime and Disorder

- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

The Licensing Authority must also have regard to its Licensing Policy and any guidance issued by the Secretary of State.

4. Background

The applicant's agent Arka Licensing Consultants has described the premises –

“This is long established convenience store situated in the residential area. This a local community store. Applicant is investing to renovate and refit the store to high standard and also joining Premier Retail Group. The Store will have all products and services as part of the convenience store. The store will be opening from 6am for essential morning items such as coffee, tea etc. Applicant is a family business with experience in licensed retail and embarking this new venture.”

Records held by the Licensing Section show that the premises situated at 57-59 Cumberland Road, Middlesbrough was previously licensed for the sale of alcohol for consumption off the premises. However, such licence was revoked in 2015 following formal review proceedings.

5. The Representations

On 28 May 2026 a representation was received from T Evans objecting to the application on the grounds of the prevention of public nuisance and the protection of children from harm. A copy of the representation is attached at **Appendix 2**.

On 28 May 2026 a representation was received from Ms D Okeefe objecting to the application on the grounds of the prevention of crime and disorder, public safety and the prevention of public nuisance. A copy of the representation is attached at **Appendix 3**.

On 3 June 2026 a representation was received from Lindsay Clode, Senior Public Health Officer, objecting to the application on the grounds of the prevention of crime and disorder, the prevention of public nuisance, public safety and the protection of children from harm. A copy of the representation is attached at **Appendix 4**.

On 4 June 2026 a representation was received from Fiona Helyer, Principal Public Protection Officer, acting on behalf of the Licensing Authority, objecting on the grounds of the prevention of crime and disorder, the prevention of public nuisance, public safety and the protection of children from harm. A copy of the representation is attached at **Appendix 5**.

On 4 June 2026 a representation was received from Cleveland Police objecting to the application on the grounds of the prevention of crime and disorder and the prevention of public nuisance. A copy of the representation is attached at **Appendix 6**.

On 22 June 2026 the Principal Public Protection Officer submitted further documentation in support of their representation. A copy of this further submission is attached at **Appendix 7**.

On 23 June 2026 the Senior Public Health Officer submitted further documentation in support of their representation. A copy of this further submission is attached at **Appendix 8**.

On 23 June 2026 Cleveland Police submitted further documentation in support of their representation in the form of a witness statement of PC Roberts, Police Licensing Officer. A copy of this further submission is attached at **Appendix 9**.

6. Cumulative Impact Assessment and Policies 2025-2028

The representations having been made by the three responsible authorities include reference to the Council's Cumulative Impact Policy (CIP) affecting Park Ward, the area within which the Cumberland Convenience Store is situated. The current revised CIP was implemented on 1 May 2025 together with the Council's revised Statement of Licensing Policy.

The aim of a CIP is to limit the growth of licensed premises where the promotion of the licensing objectives is being compromised. CIPs strengthen the ability of Local Authorities to control the availability of alcohol and to reduce alcohol-related crime and disorder. The Cumulative Impact Assessment provide the industry with greater clarity about how the CIPs are used and provide transparency over the evidence used to implement CIPs.

A CIP may be published by a Local Authority to help it to limit the number or type of applications granted in areas where there is evidence to show that the number or density of licensed premises in an area is having a cumulative impact which are leading to problems which are undermining the licensing objectives. This can include serious problems with disorder and nuisance.

When considering cumulative impact, the guidance under 182 of the Licensing Act 2003 suggests that Councils should consider a broad range of data sources including data held by Responsible Authorities such as Police and Environmental Health. Public Health data can also be relevant, although public health is not a licensing objective.

Whilst the evidence underpinning the publication of a cumulative impact policy should generally be the basis for a decision to refuse an application or impose conditions, it does not change the way that decisions are made under the Licensing Act 2003. If no representations are received, the licensing authority must grant the application subject to terms that are consistent with the operating schedule submitted by the Applicant. If relevant representations are received, each decision still needs to be made on a case-by-case basis with a view to promoting the licensing objectives.

It is for the applicant to demonstrate, within their operating schedule, that they will not be adding to the Cumulative Impact. Applications in areas covered by the CIA should therefore give consideration to potential cumulative impact issues when setting out the steps that will be taken to promote the licensing objectives.

The Licensing Authority recognises that the cumulative impact policy is not absolute, and that any application will continue to be considered on its own merits. The Licensing Authority will give consideration to the contents of the applicants operating schedule, any relevant representations and whether the imposition of appropriate conditions would be effective in preventing problems.

Park ward is one of 8 wards in Middlesbrough that are affected by the current CIP that relates to off-licensed premises. The CIP states that in respect of applications for new premises licences in these designated wards, following representations made such applications would normally be refused if they are likely to add to the existing cumulative impact.

7. The Licensing Policy

Members are referred to the following relevant sections of the Council's Licensing Policy.

Prevention of Crime and Disorder

Page 18

Public Safety	Page 30
Prevention of Public Nuisance	Page 32
Protection of Children from Harm	Page 34
Cumulative Impact Policies	Page 45

and any other sections of the Policy which Members consider to be relevant.

8. Revised Guidance to the Licensing Act 2003 (published February 2026)

Members are referred to the following relevant sections of the Guidance.

Prevention of Crime and Disorder	Starting at paragraph 2.1
Public Safety	Starting at paragraph 2.8
Prevention of Public Nuisance	Starting at paragraph 2.20
Protection of Children from Harm	Starting at paragraph 2.27
Determining applications	Starting at paragraph 9.1
Cumulative Impact Assessments	Starting at paragraph 14.24

and any other sections of the Guidance which Members consider to be relevant.

9. Members' Options

Under the provisions of Section 18(4) the Licensing Act 2003 Members may consider the following options:

1. Grant the licence subject to conditions consistent with the operating schedule modified to such extent as considered appropriate for the promotion of the licensing objectives.
2. To refuse to specify a person in the licence as the premises supervisor.
3. To reject the application.

Members are reminded that any aggrieved party to the hearing (i.e. Applicant, Responsible Authority or Other Person) may appeal any decision of the Licensing Sub-Committee to the Magistrates' Court.

Contact Officer: Steve Wearing
Principal Licensing Officer
Tel. 728513

Application for a premises licence to be granted under the Licensing Act 2003

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form. If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We KEERTHITHANA ARULTHAS

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003

Part 1 – Premises details

Postal address of premises or, if none, ordnance survey map reference or description CUMBERLAND CONVENIENCE STORE 57-59 CUMBERLAND ROAD			
Post town	MIDDLESBOROUGH	Postcode	TS5 6PN

Telephone number at premises (if any)	
Non-domestic rateable value of premises	£7300

Part 2 - Applicant details

Please state whether you are applying for a premises licence as **Please tick as appropriate**

- a) an individual or individuals * please complete section (A)
- b) a person other than an individual *
 - i as a limited company/limited liability partnership please complete section (B)
 - ii as a partnership (other than limited liability) please complete section (B)
 - iii as an unincorporated association or please complete section (B)
 - iv other (for example a statutory corporation) please complete section (B)
- c) a recognised club please complete section (B)
- d) a charity please complete section (B)

- e) the proprietor of an educational establishment please complete section (B)
- f) a health service body please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital in Wales please complete section (B)
- ga) a person who is registered under Chapter 2 of Part 1 of the Health and Social Care Act 2008 (within the meaning of that Part) in an independent hospital in England please complete section (B)
- h) the chief officer of police of a police force in England and Wales please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm (by ticking yes to one box below):

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or
- I am making the application pursuant to a statutory function or
- a function discharged by virtue of Her Majesty's prerogative

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input checked="" type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname ARULTHAS			First names KERTHITHANA		
Date of birth [REDACTED]		I am 18 years old or over <input checked="" type="checkbox"/> Please tick yes			
Nationality [REDACTED]					
Current residential address if different from premises address		[REDACTED]			
Post town			[REDACTED]		Postcode
[REDACTED]			[REDACTED]		
Daytime contact telephone number					
E-mail address (optional)					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service (please see note 15 for information)					
[REDACTED]					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
Date of birth		I am 18 years old or over <input type="checkbox"/>		Please tick yes	
Nationality					
Where applicable (if demonstrating a right to work via the Home Office online right to work checking service), the 9-digit 'share code' provided to the applicant by that service: (please see note 15 for information)					
Current residential address if different from premises address					
Post town		Postcode			
Daytime contact telephone number					
E-mail address (optional)					

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name
Address
Registered number (where applicable)
Description of applicant (for example, partnership, company, unincorporated association etc.)

Telephone number (if any)
E-mail address (optional)

Part 3 Operating Schedule

When do you want the premises licence to start?

DD	MM	YYYY
1 0	0 5	2 0 2 6

If you wish the licence to be valid only for a limited period, when do you want it to end?

DD	MM	YYYY

Please give a general description of the premises (please read guidance note 1)

THIS IS A LONG ESTABLISHED CONVENIENCE STORE SITUATED IN THE RESIDENTIAL AREA. THIS IS A LOCAL COMMUNITY STORE. APPLICANT IS INVESTING TO RENOVATE AND REFIT THE STORE TO HIGH STANDARD AND ALSO JOINING PREMIER RETAIL GROUP. THE STORE WILL HAVE ALL PRODUCTS AND SERVICES AS PART OF THE CONVENIENCE STORE. THE STORE WILL BE OPENING FROM 6AM FOR ESSENTIAL MORNING ITEMS SUCH A COFFEE TEA ETC. APPLICANT IS A FAMILY BUSINESS WITH EXPERIENCE IN LICENSED RETAIL AND EMBARKING THIS NEW VENTURE.

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

What licensable activities do you intend to carry on from the premises?

(please see sections 1 and 14 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment (please read guidance note 2)

Please tick all that apply

- a) plays (if ticking yes, fill in box A)
- b) films (if ticking yes, fill in box B)
- c) indoor sporting events (if ticking yes, fill in box C)
- d) boxing or wrestling entertainment (if ticking yes, fill in box D)
- e) live music (if ticking yes, fill in box E)
- f) recorded music (if ticking yes, fill in box F)
- g) performances of dance (if ticking yes, fill in box G)
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)

Provision of late night refreshment (if ticking yes, fill in box I)

Supply of alcohol (if ticking yes, fill in box J)

In all cases complete boxes K, L and M

A

Plays Standard days and timings (please read guidance note 7)			Will the performance of a play take place <u>indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
Mon			Please give further details here (please read guidance note 4)	Both	<input type="checkbox"/>
Tue			State any seasonal variations for performing plays (please read guidance note 5)		
Wed			Non standard timings. Where you intend to use the premises for the performance of plays at different times to those listed in the column on the left, please list (please read guidance note 6)		
Thur					
Fri					
Sat					
Sun					

B

Films Standard days and timings (please read guidance note 7)			<u>Will the exhibition of films take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
			<u>State any seasonal variations for the exhibition of films</u> (please read guidance note 5)		
Wed					
Thur					
			<u>Non standard timings. Where you intend to use the premises for the exhibition of films at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Fri					
Sat					
Sun					

C

Indoor sporting events Standard days and timings (please read guidance note 7)			<u>Please give further details</u> (please read guidance note 4)
Day	Start	Finish	
Mon			
Tue			<u>State any seasonal variations for indoor sporting events</u> (please read guidance note 5)
Wed			
Thur			<u>Non standard timings. Where you intend to use the premises for indoor sporting events at different times to those listed in the column on the left, please list</u> (please read guidance note 6)
Fri			
Sat			
Sun			

D

Boxing or wrestling entertainments Standard days and timings (please read guidance note 7)			<u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
Both	<input type="checkbox"/>				
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
Wed			<u>State any seasonal variations for boxing or wrestling entertainment</u> (please read guidance note 5)		
Thur					
Fri			<u>Non standard timings. Where you intend to use the premises for boxing or wrestling entertainment at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Sat					
Sun					

E

Live music Standard days and timings (please read guidance note 7)			Will the performance of live music take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	Please give further details here (please read guidance note 4)		
Mon					
			State any seasonal variations for the performance of live music (please read guidance note 5)		
Tue					
			Non standard timings. Where you intend to use the premises for the performance of live music at different times to those listed in the column on the left, please list (please read guidance note 6)		
Wed					
Thur					
Fri					
Sat					
Sun					

F

Recorded music Standard days and timings (please read guidance note 7)			Will the playing of recorded music take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
Mon			Please give further details here (please read guidance note 4)	Both	<input type="checkbox"/>
Tue					
Wed			State any seasonal variations for the playing of recorded music (please read guidance note 5)		
Thur					
Fri			Non standard timings. Where you intend to use the premises for the playing of recorded music at different times to those listed in the column on the left, please list (please read guidance note 6)		
Sat					
Sun					

G

Performances of dance Standard days and timings (please read guidance note 7)			Will the performance of dance take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish			
Mon			Please give further details here (please read guidance note 4)		
Tue					
Wed			State any seasonal variations for the performance of dance (please read guidance note 5)		
Thur					
Fri			Non standard timings. Where you intend to use the premises for the performance of dance at different times to those listed in the column on the left, please list (please read guidance note 6)		
Sat					
Sun					

H

Anything of a similar description to that falling within (e), (f) or (g) Standard days and timings (please read guidance note 7)			Please give a description of the type of entertainment you will be providing		
Day	Start	Finish	<u>Will this entertainment take place indoors or outdoors or both – please tick</u> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Mon				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Tue			<u>Please give further details here</u> (please read guidance note 4)		
Wed					
Thur			<u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u> (please read guidance note 5)		
Fri					
Sat			<u>Non standard timings. Where you intend to use the premises for the entertainment of a similar description to that falling within (e), (f) or (g) at different times to those listed in the column on the left, please list</u> (please read guidance note 6)		
Sun					

I

Late night refreshment Standard days and timings (please read guidance note 7)			Will the provision of late night refreshment take place indoors or outdoors or both – please tick (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<u>Please give further details here</u> (please read guidance note 4)		
Mon					
Tue					
Wed			<u>State any seasonal variations for the provision of late night refreshment</u> (please read guidance note 5)		
Thur					
Fri			<u>Non standard timings. Where you intend to use the premises for the provision of late night refreshment at different times, to those listed in the column on the left, please list</u> (please read guidance note 6)		
Sat					
Sun					

J

Supply of alcohol Standard days and timings (please read guidance note 7)			Will the supply of alcohol be for consumption – please tick (please read guidance note 8)	On the premises	<input type="checkbox"/>
				Off the premises	<input checked="" type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 5)		
Mon	06.00	23.00			
Tue	06.00	23.00			
Wed	06.00	23.00			
Thur	06.00	23.00			
Fri	06.00	23.00			
Sat	06.00	23.00			
Sun	06.00	23.00			
			Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 6)		

State the name and details of the individual whom you wish to specify on the licence as designated premises supervisor (Please see declaration about the entitlement to work in the checklist at the end of the form):

Name KEERTHATHANA ARULTHAS	
Date of birth [REDACTED]	
Address [REDACTED]	
Postcode [REDACTED]	
Personal licence number (if known) [REDACTED]	
Issuing licensing authority (if known) MIDDLESBROUGH COUNCIL	

K

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 9).

NONE

L

Hours premises are open to the public Standard days and timings (please read guidance note 7)			State any seasonal variations (please read guidance note 5)
Day	Start	Finish	
Mon	06.00	23.00	<p><u>Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list</u> (please read guidance note 6)</p>
Tue	06.00	23.00	
Wed	06.00	23.00	
Thur	06.00	23.00	
Fri	06.00	23.00	
Sat	06.00	23.00	
Sun	06.00	23.00	

M

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b, c, d and e) (please read guidance note 10)

1. Staff engaged in the sale or supply of alcohol to customers at the premises shall be trained in the promotion of the licensing objectives as are relevant to their duties. This shall include training on awareness of local alcohol related issues.
2. The training shall be recorded in a training record which shall not be removed from the premises, except in case of emergency or for the purposes of copying, until a period of 12 months has expired since the last entry that has been recorded.
3. The training record shall be made available to Police and authorised council officers on request.
4. All staff engaged in the sale or supply of alcohol to customers will receive documented refresher training at least every 6 months in relation to the promotion of the licensing objectives. The documentation shall include the content of the training with details confirming the name of the trainer and names of the staff undertaking the training.
5. A register of all refusals to sell alcohol shall be maintained at the premises. The register will show date, time and reason for refusal, details of any documentation presented and name of staff member who refused the sale. The register shall be retained for inspection at the premises whilst it is open for licensable activities for a period of no less than 12 months from the date of the last entry in the register being made.

b) The prevention of crime and disorder

1. The premises shall install and maintain a comprehensive CCTV system in accordance with any minimum requirements of Police. All entry and exit points will be covered enabling frontal identification of every person entering in any light condition.
2. The CCTV system shall continually record whilst the premises is open for licensable activities and during all times when customers remain on the premises and will include the external area immediately outside the premises entrance.
3. All recordings shall be stored for a minimum period of 31 days (or other specified time period) with date and time stamping. Viewing of recordings shall be made available immediately upon the request of Police or authorised officer throughout the entire 31-day period (or other specified time period).
4. A staff member from the premises who is adequately trained in the operation of the CCTV system shall be on the premises at all times when the premises is open for licensable activities. This staff member must be able to provide an authorised officer of Middlesborough Council or Police with copies of the requested CCTV images or

data within 24 hours of the request.

5. A written log shall be maintained of routine checks and maintenance to the CCTV system. Routine checks shall include ensuring the date and time are correct, all cameras are recording and the minimum period of required storage is being maintained.

c) Public safety

1. The Licensee shall ensure that appropriate fire safety procedures are in place.

d) The prevention of public nuisance

2. Deliveries of goods necessary for the operation of the business will be carried out at such a time or in such a manner as to prevent nuisance and disturbance to nearby residents.

e) The protection of children from harm

3. All tills shall automatically prompt staff to ask for age verification identification when presented with an alcohol sale.
4. A Challenge 25 proof of age scheme shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification cards, such as a valid driving licence, a valid UK passport, a valid international passport or ID card or a valid government approved proof of age card with the PASS Hologram.
5. A record shall be kept detailing all refused sales of alcohol relating to under age customers. The record should include the date and time of the refused sale and the name of the member of staff who refused the sale.
6. The record shall be available for inspection at the premises by the police or an authorised officer of Middlesborough Council at all times whilst the premises is open.
7. standards scheme) cars approved as means of ID. If you accept other forms of ID such as EU national ID cards, these must bear a photograph, DOB, and holographic mark.

8. Use till prompts to remind staff to ask for proof of age.

Checklist:

Please tick to indicate agreement

- I have made or enclosed payment of the fee.
- I have enclosed the plan of the premises.
- I have sent copies of this application and the plan to responsible authorities and others where applicable.
- I have enclosed the consent form completed by the individual I wish to be designated premises supervisor, if applicable.
- I understand that I must now advertise my application.
- I understand that if I do not comply with the above requirements my application will be rejected.
- [Applicable to all individual applicants, including those in a partnership which is not a limited liability partnership, but not companies or limited liability partnerships] I have included documents demonstrating my entitlement to work in the United Kingdom or my share code issued by the Home Office online right to work checking service (please read note 15).

IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.

IT IS AN OFFENCE UNDER SECTION 24B OF THE IMMIGRATION ACT 1971 FOR A PERSON TO WORK WHEN THEY KNOW, OR HAVE REASONABLE CAUSE TO BELIEVE, THAT THEY ARE DISQUALIFIED FROM DOING SO BY REASON OF THEIR IMMIGRATION STATUS. THOSE WHO EMPLOY AN ADULT WITHOUT LEAVE OR WHO IS SUBJECT TO CONDITIONS AS TO EMPLOYMENT WILL BE LIABLE TO A CIVIL PENALTY UNDER SECTION 15 OF THE IMMIGRATION, ASYLUM AND NATIONALITY ACT 2006 AND PURSUANT TO SECTION 21 OF THE SAME ACT, WILL BE COMMITTING AN OFFENCE WHERE THEY DO SO IN THE KNOWLEDGE, OR WITH REASONABLE CAUSE TO BELIEVE, THAT THE EMPLOYEE IS DISQUALIFIED.

Part 4 – Signatures (please read guidance note 11)

Signature of applicant or applicant’s solicitor or other duly authorised agent (see guidance note 12). **If signing on behalf of the applicant, please state in what capacity.**

Declaration	<ul style="list-style-type: none"> • [Applicable to individual applicants only, including those in a partnership which is not a limited liability partnership] I understand I am not entitled to be issued with a licence if I do not have the
--------------------	---

	<p>entitlement to live and work in the UK (or if I am subject to a condition preventing me from doing work relating to the carrying on of a licensable activity) and that my licence will become invalid if I cease to be entitled to live and work in the UK (please read guidance note 15).</p> <ul style="list-style-type: none"> The DPS named in this application form is entitled to work in the UK (and is not subject to conditions preventing him or her from doing work relating to a licensable activity) and I have seen a copy of his or her proof of entitlement to work, or have conducted an online right to work check using the Home Office online right to work checking service which confirmed their right to work (please see note 15)
Signature	NIRA SURESH
Date	07/05/2026
Capacity	LICENSING AGENT

For joint applications, signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent (please read guidance note 13). If signing on behalf of the applicant, please state in what capacity.

Signature	
Date	
Capacity	

<p>Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14) ARKA LICENSING CONSULTANTS TRIDENT BUSINESS CENTRE 89 BICKERSTETH ROAD</p>			
Post town	LONDON	Postcode	SW17 9SH
Telephone number (if any)	[REDACTED]		
<p>If you would prefer us to correspond with you by e-mail, your e-mail address (optional) CONTACT@ARKALICENSING.CO.UK</p>			

Premier

Cumberland Convenience

Address
59 Cumberland
Road Middlesbrough
TS5 6PN

Drawing Type	NEW
Store Type	Standard
Store Size	565qft
Building Size	
Drawn By	Sam Fenton
Scale @ A2	1:40.641
Date	20.04.2026
Revision	V1
Signed Off	NO

- Notes
- Push Kit System
 - 9 Facings
 - SOL14216 X 1
 - Biscuit Mini Riser
 - 800x40m
 - PD560801522C2 X100
 - Polywicker Basket
 - Brown
 - SOL14199 X 6
 - Impulse Basket
 - with Wooded surround
 - 179434/PD X 1
 - A3 Snap Frame Black
 - UCN25510A3/PD
 - A4 Holder L Shaped
 - 70.50.0124-20/PD
 - Base Plinth Box of 8
 - PD/993637
 - Telescopic A4 POS Holder
 - Black SMM01130
 - Ridge Trays
 - 570x420 2 x 10
 - Ice Cream
 - Acrylic Shelves 570x450
 - CDD4994/PD

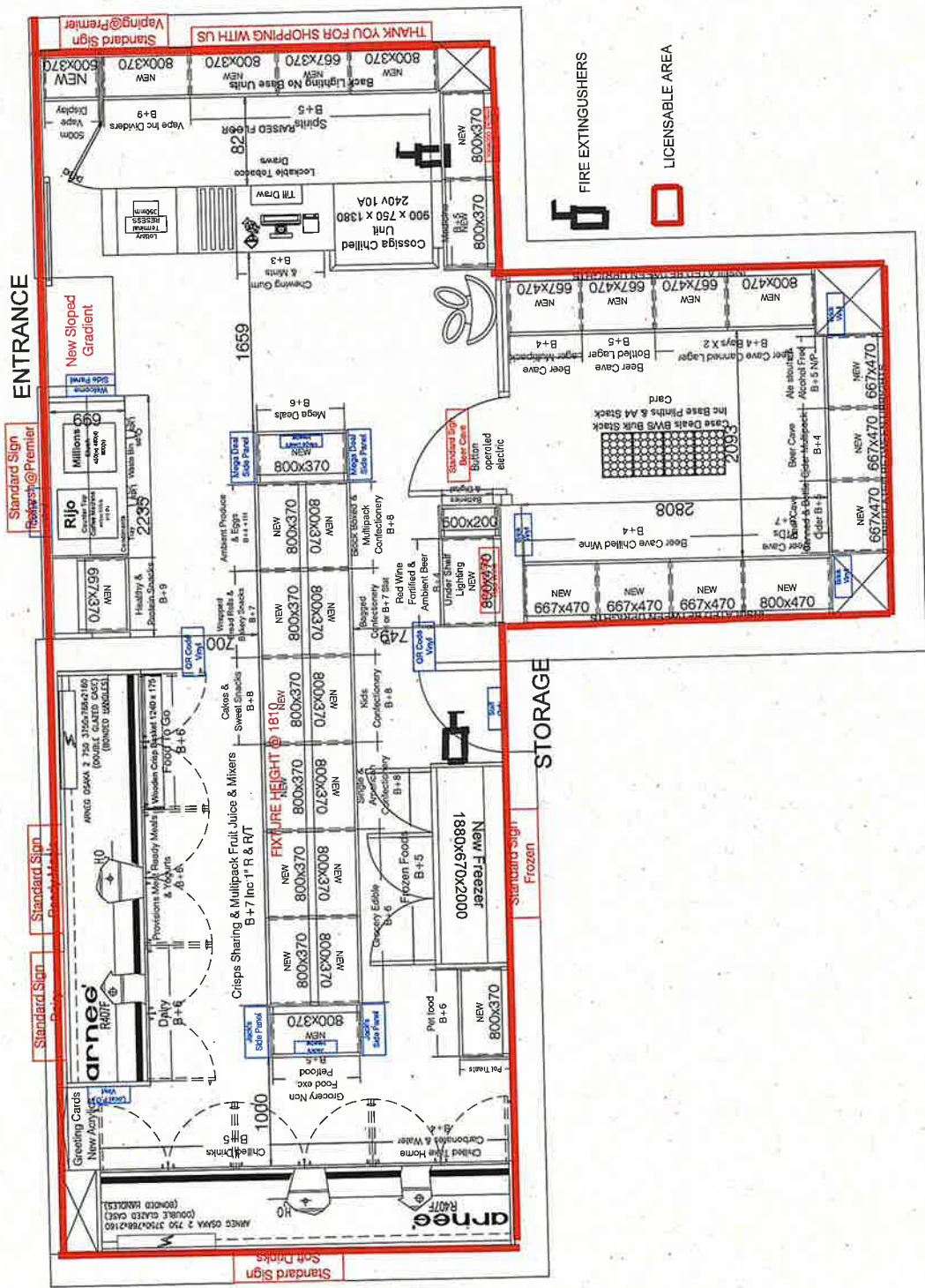
All dimensions are shown in millimeters unless stated otherwise. It must be checked by the shopfitter prior to construction that the drawings are in accordance with the specification and that all other relevant drawings, documents & specifications. All works to be carried out by a qualified shopfitter in accordance with the manufacturer's instructions. The liability of this drawing must be checked by a qualified shopfitter, who should ensure that the drawing meets all the required legislation. Booker Limited & the shopfitter shall not be responsible for any errors or omissions. For any queries please contact the Merchandising & Development department or the relevant member of the project team.

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BOOKER

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Judith Catchpole

From: [REDACTED]
Sent: Thursday, 28 May 2026 23:37
To: Licensing
Subject: Stop & shop

You don't often get email from [REDACTED] [Learn why this is important](#)

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. If in doubt contact ICT Services via the YourICT link on The Bridge.

Good morning

Under stand that stop and shop 59 Cumberland road middlesbrough ts5 6pn owner are hoping for booze licence this in residential area and have young children around we have shops who have licence to sell alcohol within 5 minutes walk this just create young youths to be hanging around at the shop we all ready have trouble with speeding motorists so I firmly a pause granting licence and refit we had no letter re this matter just happened to pick it up on line

Regards
T Evans

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Judith Catchpole

From: [REDACTED]
Sent: Thursday, 28 May 2026 08:13
To: Licensing
Subject: Fwd: Convenience Store 57-59 Cumberland Road Middlesbrough. TS5 6PN

Follow Up Flag: Follow up
Flag Status: Flagged

You don't often get email from [REDACTED] [Learn why this is important](#)

CYBER SECURITY WARNING: This email is from an external source - be careful of attachments and links. If in doubt contact ICT Services via the YourICT link on The Bridge.

Hello

I wish to object to the licencing application for the above named premises in respect of the Sale of Alcohol from 6am-11pm daily.

I am a local resident and feel this will lead to an increase in drunkenness, anti-social behaviour, public order offences, increased littering and will impact on the safety of those living in the area. In an area already impacted by off road motorbikes and blatant drug dealing, shoplifting and homelessness, access to the purchasing of alcohol I feel will damage the once quiet residential area further,

Submitted for you consideration.

Kind regards

This page is intentionally left blank

KEERTHATHANA ARULTHAS
CUMBERLAND CONVENIENCE STORE
57-59 Cumberland Road
Middlesbrough
TS5 6PN

Dated: 03 June 2026

Dear Madam,

Licensing Act 2003

**Premises: CUMBERLAND CONVENIENCE STORE, 57-59 CUMBERLAND ROAD,
Middlesbrough, TS5 6PN**

With reference to your application for a licence under the Licensing Act 2003, and as a designated 'Responsible Authority', I wish to advise you that it is my intention to make a representation against your application. My reasons for making the representation are attached.

A Licensing Officer will contact you in due course regarding the arrangements for a hearing of your application before the Licensing Sub-Committee, as applicable.

If you would like to discuss this matter, please do not hesitate to contact me.

Yours faithfully,



Lindsay Clode
Senior Public Health Officer
Licensing
Middlesbrough Council
PO Box 500, Middlesbrough, TS1 9FT
lindsay_clode@middlesbrough.gov.uk

Middlesbrough Council
The Licensing Act 2003 - Responsible Authority (RA) Representation

Name of RA Representative: Lindsay Clode

Address: Public Protection Service, Civic Centre, Middlesbrough.

Email: lindsay_clode@middlesbrough.gov.uk **Tel** 07889923524

Licence holder details

Name and Address of Premises

Address: CUMBERLAND CONVENIENCE STORE, 57-59 CUMBERLAND ROAD,
MIDDLESBROUGH, TS5 6PN

Name of licence holder or club holding club premises certificate (if known)

KEERTHTHANA ARULTHAS

Number of premises licence or club premise certificate (if known)

Representation

It is my opinion that the application fails to adequately satisfy the following licensing objectives:

x	Prevention of Crime and Disorder
x	Prevention of Public Nuisance
x	Public Safety
x	Protection of Children from Harm

Grounds for representation (including details of any previous representations)

Evidence presented by Middlesbrough Council, Responsible Authority for Public Health, in relation to the application made by Mrs KEERTHTHANA ARULTHAS, the applicant and Premises Licence holder for premises situated at 57-59 CUMBERLAND ROAD, MIDDLESBROUGH, TS5 6PN, under the Licensing Act 2003

As the representative of the Responsible Authority for Public Health, I make this representation against this Premises Licence application on the grounds of Crime and Disorder, Prevention of Public Nuisance, Public Safety and Protection of Children from Harm.

The application made is for the grant of a new premises licence from 06:00 – 23:00 hours seven days a week for the supply of alcohol. Mrs Keerththana Arulthas, the proposed Premises Licence holder and Designated Premises Supervisor for the business, makes the application.

There are a number of concerns regarding the current application made to Middlesbrough Council's Licensing Authority and it is our opinion that the granting of these premises off licence will have a negative impact on all four of the licensing objectives.

Middlesbrough has two Cumulative Impact Policies (CIP). CIP 1 covers On licensed premises in a designated area of Middlesbrough Town Centre. CIP 2 covers Off licence premises, across 8 ward areas including Central, Newport, North Ormesby, Park, Longlands and Beechwood, Berwick Hills & Pallister, Brambles & Thorntree, Park End & Beckfields.

In both CIP areas there are high proportions of alcohol related crimes, wholly attributable hospital admissions and crime and disorder incidents recorded. This, together with the high density of licence premises in both areas has evidenced the need for Cumulative Impact Policies.

The Proposed licensed premises is situated on 57-59 Cumberland Road, Middlesbrough, TS5 6PN. In the Park ward area of Middlesbrough. Park ward is one of the 8 wards listed in the CIP 2. Park ward also borders Central, Newport, Longlands & Beechwood wards which are also listed in CIP 2.

It is our opinion that the granting of this licence will negatively impact on all four licensing objectives.

Currently, there are 10 off licensed premises operating in the Park ward area of Middlesbrough. The nearest premises to the proposed address is approximately 200 meters away, on Cumberland Road, 3 in Linthorpe Village and 3 on Eastbourne road.

Public Health has a duty to consider the wider impacts of alcohol availability, including health harms, community safety, and health inequalities

Allowing another alcohol premises to operate between the hours of 6am – 11pm daily makes alcohol more readily available and will not only exacerbate some of the alcohol related issues already experienced, it will also add unnecessary pressures to our emergency services including NHS Accident and Emergency departments, ambulance services and Police.

Following receipt of the application submitted by a representative of ARKA LICENSING CONSULTANTS on behalf of Mrs Keerthana Arulthas a number of concerns were raised in regard to experience, capacity, and the competence of the proposed Designated Premises Supervisor (DPS).

A meeting was scheduled by Fiona Helyer Middlesbrough Council Principal Licencing Officer for Friday May 22nd May at 09:30 to discuss the application. All parties including, Mrs Keerthana Arulthas, Mr Suresh from Arka licensing consultants and PC Roberts from Cleveland police Licencing were invited to the meeting however due to the applicant and Licencing consultant failing to attend, the meeting was re scheduled for Wednesday 27th May 2026 at 1pm.

During the meeting held on Wednesday 27th May 2026, concerns were raised and discussed regarding the area in which the premises are situated, the levels of crime and anti-social behaviour experienced and the associated alcohol related harm. There were also concerns raised around the experience, capacity and competence of Keerthana Arulthas and her being proposed as the Designated Premises Supervisor (DPS) given that she is already named as the DPS at two other licenced premises.

During the meeting the following points were discussed:

- Business model including operational procedures and staffing
- Alcohol availability and products for retail
- DPS's capacity and understanding of their role.
- Cumulative Impact Areas
- Operating schedules and conditions put forward by the applicant within the application.
- Right to work

During the meeting and due to a number of questions asked of Mrs Keerthana Arulthas there were further concerns raised around her experience and knowledge of the Licensing Act.

Alcohol is readily available in Middlesbrough and can be purchased from a number of different alcohol premises including off licences, supermarkets and premises offering alcohol delivery services. Middlesbrough experiences a number of issues including incidents of alcohol related crime and disorder and anti-social behaviour that impact on many lives. Such issues also impact negatively on our local NHS services including James Cook Accident & Emergency departments, Police and ambulance services.

It is our opinion that the granting of this licence would further undermine the Crime and Disorder, Prevention of public nuisance, Public Safety and protection of Children from harm licensing objectives and will exacerbate the problems already experienced.

Further evidence will be submitted prior to any future licensing sub-committee hearing.

Signed:



Dated 03.06.2026



Keerththana Arulthas
Cumberland Convenience Store
57-59 Cumberland Road
Middlesbrough
TS5 6PN

Dated: 04.06.26

Dear Madam,

LICENSING ACT 2003

**Premises: Cumberland Convenience Store, 57-59 Cumberland Road,
Middlesbrough, TS5 6PN**

With reference to your application for a premises licence under the Licensing Act 2003, and as a designated 'Responsible Authority' acting on behalf of Licensing, I wish to advise you that it is my intention to make a representation against your application. My reasons for making the representation are attached.

An Officer will contact you in due course regarding the arrangements for a hearing of your application before the Licensing Sub-Committee, as applicable.

If you would like to discuss this matter, please do not hesitate to contact me.

Yours faithfully,

A handwritten signature in black ink, appearing to read "Fiona Helyer".

Fiona Helyer
Principle Public Protection Officer
Licensing

Middlesbrough Council
The Licensing Act 2003 - Responsible Authority (RA) Representation

Name of RA Representative: Fiona Helyer

Address: Public Protection, Middlesbrough Council, PO Box 500, Middlesbrough, TS1 9FT.

Email: EHTS@middlesbrough.gov.uk **Tel** 01642 728717

Licence holder details

Name and Address of Premises – Cumberland Road Convenience Store

Address: 57-59 Cumberland Road, Middlesbrough TS5 6PN

Name of licence holder or club holding club premises certificate (if known)
Mrs Keerththana Arulthas

Number of premises licence or club premise certificate (if known)

Representation

It is my opinion that the application fails to adequately satisfy the following licensing objectives:

x	Prevention of Crime and Disorder
x	Prevention of Public Nuisance
x	Public Safety
x	Protection of Children from Harm

Grounds for representation (including details of any previous representations)

Evidence presented by Middlesbrough Council, Responsible Authority for Licensing, in relation to the application made by Mrs Keerththana Arulthas, the applicant and Premises Licence holder for premises situated at 57-59 Cumberland Road, Middlesbrough, under the Licensing Act 2003.

As the representative of the Responsible Authority for Licensing, I make this representation against this Premises Licence application on the grounds of Crime and Disorder, Public Safety, Prevention of Public Nuisance and Protection of Children from Harm.

The application made is for the grant of a new off premises licence for the supply of alcohol from 0600 – 2300 seven days a week. The application is made by Mrs Keerththana Arulthas, the proposed Premises Licence Holder and nominated persons for the position of the Designated

Premises Supervisor.

There are a number of concerns regarding the current application made to Middlesbrough Council's Licensing Authority and it is our opinion that the granting of these premises off licence will have a negative impact on the Crime and Disorder, Public Safety and Protection of Children from Harm licensing objectives.

In Middlesbrough there are high levels of alcohol related crime and disorder and wholly attributable hospital admissions recorded. This, together with the high density of licensed premises has evidenced the need for two Cumulative Impact Policies.

Middlesbrough has two Cumulative Impact Policies (CIP). CIP 1 covers on licensed premises in a designated area of Middlesbrough Town Centre. CIP 2 covers off licence premises across 8 ward areas including Central, Newport, North Ormesby, Park and Longlands and Beechwood, Berwick Hills & Pallister, Park End & Beckfields and Thorntree & Brambles Farm.

These premises are situated in the Park ward and sit within the CIP 2 policy area for off licensed premises. Park ward also borders with other areas in the CIP including Newport, Central and Longlands and Beechwood wards.

The premises are situated near other off licensed premises, one being approximately 200 meters away, situated on corner of Cumberland Road/Southwell Road, others can be located on Eastbourne Road and Linthorpe Village where there have been several issues reported including street drinking and begging and the availability of cheap high strength alcohol. These premises sit in the heart of a residential area where families and children live. This raises several concerns relating to Crime, ASB and Public Nuisance.

A meeting was held on Wednesday 27 June 2026 with the applicant and her licensing consultant Mr Suresh from Arka Licensing. PC Amy Roberts from Cleveland Police and Lindsay Clode from Middlesbrough Council's Public Health were also present. The meeting was to discuss the application as in my opinion the applicant had failed to demonstrate adequately in Part M of the application how this premises, if granted a licence, would not negatively impact further on the licensing objectives and the surrounding areas.

During the meeting discussions took place around the alcohol related crime and asb experienced in the area, including street drinking and the availability of cheap alcohol. This led to several questions being asked about the applicant's intention regarding the processes around the sale of alcohol and the products to be sold. Concerns were raised at the time regarding the proposed PLH and DPS already managing two other licensed premises, one in the Ayresome Street area of Middlesbrough where there had been several complaints/concerns received around young people accessing the premises. The other premises being situated with Redcar and Cleveland.

Throughout the meeting there appeared to be a clear lack of knowledge, experience and understanding of the licensing legislation and the issues experienced within this area by the applicant.

On Monday 1 June 2026 an email was received from Mr Suresh who apologised on behalf of the applicant, advising that there had been some noise issues during the meeting and she had not been able to hear the questions asked clearly. He suggested that this was the reason she had failed to answer the questions adequately.

The following offer was made to amend the application and add the following condition to relieve concerns around street drinking:

- To include a condition around no beers, lagers and ciders above 6.5% ABV.

Mr Suresh also confirmed that the applicant would be prepared to surrender her status as DPS for her other two premises to allow her to concentrate on this store.

Given that the premises are situated in Park ward, a ward which is covered by a Cumulative Impact Policy, we do not feel that the application and two additional proposed conditions go far enough to address our concerns. In addition, following our meeting and the discussions with the applicant, the Licensing Authority have no confidence in the proposed PLH and DPS.

It is our opinion that the granting of this licence would further undermine the Crime and Disorder, Public Safety, Public Nuisance and Protection of Children from Harm licensing objectives and will exacerbate the problems already experienced.

Further evidence will be submitted prior to any future licensing sub-committee hearing.

Signed:



Dated 04.06.26

Middlesbrough Council

www.middlesbrough.gov.uk

COMMUNITY PROTECTION SERVICES

Licensing

PO Box 65, Vancouver House, Gurney Street,
Middlesbrough TS1 1QP
Tel: (01642) 245432



Representations On A Current Application For A Grant/Variation of a Premises Licence Or Club Premises Certificate Under The Licensing Act 2003

Before Completing This Form Please Read The Guidance Notes At The End Of The Form

If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary. You may wish to keep a copy of the completed form for your records.

I (Insert name)

PC 2495 ROBERTS

Wish to make representation about the application for variation/grant for a premises licence/club premises certificate (delete as applicable)

PART 1 – PREMISES OR CLUB PREMISES DETAILS

Postal Address of Premises or Club Premises, or if none, ordnance survey map reference or description	
Post Town MIDDLESBROUGH	Post Code
Name of premises licence holder or club holding club premises certificate (if known)	
N/A	
Number of premises licence or club premise certificate (if known)	

PART 2 – DETAILS OF PERSON MAKING REPRESENTATION

I am

Please
Tick ✓

- | | | |
|----|---|--------------------------|
| 1) | an interested party (please complete (A) or (B) below) | <input type="checkbox"/> |
| | a) a person living in the vicinity of the premises | <input type="checkbox"/> |
| | b) a body representing persons living in the vicinity of the premises | <input type="checkbox"/> |
| | c) a person involved in business in the vicinity of the premises | <input type="checkbox"/> |
| | d) a body representing persons involved in business in the vicinity of the premises | <input type="checkbox"/> |
| 2) | a responsible authority (please complete (C) below) | x |
| 3) | a member of the club to which this representation relates (please complete (A) below) | <input type="checkbox"/> |

(A) DETAILS OF INDIVIDUAL MAKING REPRESENTATION (fill in as applicable)

Mr Mrs Miss Ms Other Title (for example, Rev)

Surname

First Names

I am 18 years old or over Yes (Please Tick)

Current Address			
Post Town		Post Code	

Daytime contact telephone number

E-mail address (optional)

(B) DETAILS OF OTHER PARTY MAKING REPRESENTATION (e.g. Body or Business)

Name and Address

Telephone Number (If any)	
E-Mail address (optional)	

(C) DETAILS OF RESPONSIBLE AUTHORITY MAKING REPRESENTATION

Name and Address CHIEF CONSTABLE OF CLEVELAND POLICE C/O POLICE CONSTABLE 2495 ROBERTS MIDDLESBROUGH DISTRICT H/Q BRIDGE STREET WEST MIDDLESBROUGH TS2 1AB
--

Telephone Number (If any)	01642 303175
E-Mail address (optional)	

This representation relates to the following licensing objective(s)

Please
Tick ✓

- | | | |
|----|--------------------------------------|--------------------------|
| 1. | The prevention of crime and disorder | X |
| 2. | Public safety | <input type="checkbox"/> |
| 3. | The prevention of public nuisance | X |
| 4. | The protection of children from harm | <input type="checkbox"/> |

Please state the ground(s) for representation. (please read guidance note 1)

Cleveland Police have received an application made under the Licensing Act 2003 for a premise licence to be granted at CUMBERLAND CONVENIENCE STORE, 57-59 CUMBERLAND ROAD, MIDDLESBROUGH, TS56PN. The applicant is seeking the provision of the sale of alcohol from 0600hrs until 2300hrs, seven days a week.

Cleveland Police submit representations to this application for the following reasons:

Given that this is a brand-new application for a licence to sell alcohol at an existing business, the full effects that this alcohol licence will have on the premise and the local community cannot be measured at this time, however, the area in which the premise is situated in is in close proximity to residential properties and a school.

Middlesbrough has two cumulative impact policies in force at the moment, one for on licensed premises and one for off licensed premises. In both cumulative Impact Policy areas, there are already high levels of alcohol related crime and disorder and anti-social behaviour. This Proposed premise sits in the area that has the Cumulative Impact Policy in force for off licensed premises, as this premise will operate from the Park ward.

As evidenced by the need for Cumulative Impact policies, Middlesbrough already suffers from high levels of alcohol related crime and disorder and anti-social behaviour and Cleveland Police are firmly of the belief that another off licensed premise will only exacerbate the existing problems, by making alcohol more readily available to persons who have may already be intoxicated and to vulnerable persons. This is particularly concerning considering more and more people are consuming more alcohol at home.

A meeting was arranged for Police, Public Health and Council Licensing with the agent and the applicant, but this had to be re-arranged due to technical difficulties. During the second meeting, on Wednesday 27th June 202, it became apparent that whilst conversations were being held the applicant and proposed designated premise supervisor didn't seem to understand what was expected as part of her role, she couldn't answer simple questions and due to this we the Police don't have confidence in her to run this new premise properly. She is also currently the Designated

premise supervisor of two other stores, one of which we as responsible authorities had concerns over. For someone who had recently completed her personal licence course, she didn't seem to have a grasp of some of the more key aspects of licensing or the knowledge to answer the questions we posed.

On Monday 1st June 2026 the agent sent an email apologising for his client, advising there was some difficulty during the meeting and couldn't hear the questions clearly that were being asked and the agent has suggested that this is why she didn't answer them correctly. They did suggest the following changes to help meet the concerns we raised.

1. Applicant will only be the DPS to this store - Not others - There will be a variation application be processed this week.
2. Applicant agreed to have condition on ABV of 6.5% on beers, ciders and lagers. This is to address the street drinking concern raised.

Cleveland Police do not believe that this application adequately address's the licensing objectives and the issue of this premise being in an area which already has a Cumulative impact policy in place. Neither do we have any confidence in the proposed designated premise supervisor in upholding the licensing objectives.

Please provide as much information as possible to support the representation. (Please read guidance note 2)
Further evidence will be submitted prior to any future licensing sub-committee hearing

Please
Tick ✓

Have you made any representation relating to these premises before?

Day	Month	Year
-----	-------	------

If Yes, please state the date of that representation

--	--	--	--	--	--	--	--

If you have made representation before relating to these premises please state what they were and when you made them.

How We Collect And Use Information

By completing this document you give Middlesbrough Council the authority to collect and retain information about you for the purpose of the application. In order to process the application we may need to check this information with other enforcement agencies, local authorities or government departments.

We must protect the public funds we handle and so we may use the information you have provided on this form to prevent and detect fraud. We may also share this information with other enforcement agencies including those organisations which handle public funds. Middlesbrough Council will not disclose information about you unless the law permits.

Middlesbrough Council is the Data Controller for the purposes of the Data Protection Act. If you want to know more about the information the Authority holds about you or the way the Authority uses that information please contact the Information Security Officer, PO Box 17, Melrose House, 1 Melrose Street, Middlesbrough, TS1 2YW.

Part 3 – Signatures (Please read guidance note 3)

Signature of representative or representative's solicitor or other duly authorised agent. (See guidance note 4) If signing on behalf of the representative please state in what capacity.

Signature	PC 2495 ROBERTS	Date	
Capacity	LICENSING SUPPORT CONSTABLE		

Contact name (where not previously given) and address for correspondence associated with this representation. (Please read guidance note 5)

Middlesbrough Police HQ,
Bridge Street West,

Post Town	Post Code
Middlesbrough	TS2 1AB

Telephone Number (if any)	01642 303175
E-mail Address (optional)	

Notes for Guidance

1. The ground(s) for representation must be based on one of the licensing objectives.
2. Please list any additional information or details for example dates of problems, which are included in the grounds for representation, if applicable.
3. The representation form must be signed.
4. A representative's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
5. This is the address, which we shall use to correspond with you about this representation.
6. Information on the Licensing Act 2003 is available at www.middlesbrough.gov.uk and you are advised to read any relevant guidance leaflets before completing this form.

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Public Protection Service

**Licensing Act 2003 – Application for a Premises Licence
Premises – Cumberland Convenience Store, Cumberland Road,
Middlesbrough****Additional evidence of Fiona Helyer, Principal Licensing Officer acting on
behalf the Licensing Authority.**

Further to my representation submitted on 4 June 2026 I would like to add the following:-

A check of licensing records relating to these premises show that these premises have been previously licensed. The premises were subject to a licence review in 2015 following an application made by Cleveland Police, due to concerns relating to drugs and underage sales. The licence was subsequently revoked by the Licensing Sub-Committee. While this does not relate to the current applicant, the previous issues remain relevant to the locality.

Due to the concerns raised within my representation that includes insufficient detail being provided in Part M of the Premises Licence application which helps to demonstrate how the applicant would promote the licensing objectives and not further undermine them, a meeting was arranged with the applicant and her licensing consultant, Mr Suresh (Arka Licensing). The initial meeting on 22 May 2026 did not take place however, a further meeting on 27 May 2026 was attended by the applicant Mrs Arulthas, Mr Suresh her licensing consultant, Cleveland Police, and Public Health representatives.

During that meeting, concerns were discussed regarding alcohol-related crime and anti-social behaviour in the area. Questions were asked about the proposed business model, including operational hours, staffing, training, and the role of the DPS. The applicant's responses were very vague, and she appeared not to fully understand the questions.

Concerns were raised regarding Mrs Arulthas acting as both PLH and DPS, as she currently holds these roles at two other premises, including one in Ayresome Street, Middlesbrough, where complaints have been received regarding underage access, and another in the Redcar and Cleveland area.

Overall, there appeared to be a lack of knowledge and understanding demonstrated by Mrs Arulthas of the licensing legislation, her role and responsibilities being the Designated Premises Supervisor and any of the local issues.

On 1 June 2026, Mr Suresh emailed me to apologise on behalf of the applicant, suggesting that noise issues had affected communication during the meeting as Mrs



Public Protection Service

Arulthas was unable to hear what was being asked. To relieve some of the concerns, he proposed an additional condition be added to the licence if granted:

- No beers, lagers, or ciders above 6.5% ABV.

He also advised that the applicant relinquish her DPS role at the other two premises to focus on this business.

Following consultation with Police and Public Health, I emailed Mr Suresh on 2 June 2026 to advise that these proposals did not address the concerns, and a representation would be made regarding this application.

Due to a request made by Mr Suresh for a further meeting to take place, I arranged a meeting which was held on 9 June 2026 with all relevant parties in attendance including Police and Public Health representatives. At this meeting, further discussions took place regarding the business model, including:

- £80,000 investment
- 15-year lease
- Proposed operating hours
- Staffing (four staff: two full-time, two part-time)
- Introduction of a "beer cave"
- Types and pricing of alcohol

The applicant advised that she was currently on maternity leave and that her husband would manage day-to-day operations in the interim, at both premises including Ayresome Street. She advised that the premises within Redcar and Cleveland had been sold. She also advised that she had never managed a premises or staff before and that she would not be keeping the existing staff, she would be employing people known to her from the Coventry and Northampton areas.

Further questions were asked regarding the role of a DPS, licensing legislation, and cumulative impact policies. The applicant again failed to demonstrate sufficient knowledge or understanding, instead referring generally to compliance measures such as Challenge 25, training and CCTV. She advised that she would not sell alcohol to intoxicated individuals and would only serve customers she considered to be "responsible." However, when asked to clarify what she meant by "responsible," she was unable to provide any further explanation.

During the meeting, Mr Suresh proposed several additional conditions. These included a restriction preventing the sale of single cans of beer, lager, and cider, and a requirement that a personal licence holder be present on the premises at all times during opening hours. He also indicated that he was willing to discuss the proposed trading hours with the applicant, although he did not specify any alternative hours for licensable activities.



Public Protection Service

Given that the premises are located within the Park Ward, which is subject to a Cumulative Impact Policy, it is considered that both the application and the additional conditions proposed do not sufficiently address the concerns of the Licensing Authority. Furthermore, the Licensing Authority has no confidence in the proposed Designated Premises Supervisor (DPS) and Personal Licence Holder (PLH) to effectively promote the licensing objectives.

It is the opinion of the Licensing Authority that granting this application would undermine the licensing objectives, specifically the prevention of crime and disorder, public safety, the prevention of public nuisance, and the protection of children from harm and the proposed operation would exacerbate the existing issues already experienced within this locality.

Signed:

A handwritten signature in cursive script, appearing to read "Jmetts".

Dated 22.06.26

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**Public Protection Service**

Additional Evidence presented by Middlesbrough Council, Responsible Authority for Public Health, against the application for a premises licence in respect of premises situated at Cumberland Convenience Store, 57-59 Cumberland Road, Middlesbrough, TS5 6PN

Further to the representation and evidence submitted on behalf of Middlesbrough Council's Public Health with regard to the above application, on the grounds of the prevention of crime and disorder, prevention of public nuisance, public safety, and the protection of children from harm. I wish to add the following:

The application made is for the grant of a new premises licence from 06:00 – 23:00 hours seven days a week for the supply of alcohol. Mrs Keerthhana Arulthas, the proposed Premises Licence holder and Designated Premises Supervisor for the business, makes the application.

There are a number of concerns regarding the current application made to Middlesbrough Council's Licensing Authority and it is our opinion that the granting of these premises off licence will have a negative impact on all four of the licensing objectives.

Middlesbrough has two Cumulative Impact Policies (CIP). CIP 1 covers on licensed premises in a designated area of Middlesbrough Town Centre. CIP 2 covers Off licence premises, across eight ward areas including Central, Newport, North Ormesby, Park, Longlands and Beechwood, Berwick Hills & Pallister, Brambles & Thorntree, Park End & Beckfields.

In both CIP areas there are high proportions of alcohol related crime and anti-social behaviour attributable to hospital admissions. This, together with the high density of licence premises in both areas has evidenced the need for Cumulative Impact Policies.

The Proposed licensed premises is situated at 57-59 Cumberland Road, Middlesbrough, TS5 6PN in the Park ward area of Middlesbrough. Park ward is one of the eight wards listed in the CIP 2. Park ward also borders Central, Newport, Longlands & Beechwood wards which are also listed in CIP 2.

Public Health data indicates that Park Ward is within the top 20% for most deprived ward areas nationally. It is our opinion that the granting of this licence will negatively impact on all four licensing objectives.

Information received from Middlesbrough Neighbourhoods Safety officers indicates that in the last 12 months there have been 39 recorded incidents on Cumberland

Road, representing an 18% increase compared to the previous year. Cumberland Road is recorded as having the highest number of incidents within the Park Ward area. The types of incidents reported at this location include violence offences, stalking and harassment, public order offences and shoplifting and theft. This data highlights a concentration of crime and disorder issues in the immediate vicinity of the premises. This suggests that the area is already developing as a hotspot, where additional licensed activity will contribute to further escalation.

There are currently seven off-licensed premises operating within the Park Ward area of Middlesbrough. However, one of these premises is currently suspended due to the non-payment of its annual fee and is therefore not authorised to sell alcohol at present. The nearest licensed premises to the proposed address is located approximately 200 metres away at 100 Cumberland Road. A map showing all off-licensed premises within Park Ward, together with five premises located within the neighbouring Linthorpe Ward area, is provided at Appendix 1.

It is important to recognise that residents living in close proximity to these premises are already experiencing the adverse effects of existing levels of crime and disorder and anti-social behaviour. Any increase in exposure to such activity is likely to exacerbate feelings of fear, anxiety, and reduced personal safety, particularly given the rising number of incidents recorded on Cumberland Road. This has the potential to further undermine residents quality of life and negatively impact their ability to enjoy their homes and surrounding neighbourhood in a safe and secure environment.

Allowing another alcohol premises to operate between the hours of 6am – 11pm daily makes alcohol more readily available and may lead to an increase alcohol related issue. This may add unnecessary pressures on emergency services including NHS Accident and Emergency departments, ambulance services, and Police.

As part of the Public Health Alcohol Availability Survey completed in June 2026, it has been identified that alcohol with a high ABV content is being sold in the Park ward area for as little as 27 pence per unit. This is of significant concern given the position of the UK Chief Medical Officers guidelines that states “the price of alcohol is an important determinant of how much people drink and the level of harm they experience.” In Scotland and Wales a Minimum Unit Price of 65 pence per unit for the sale of alcohol has been adopted to help alleviate the harms caused by the consumption of alcohol.



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Public Health has a statutory duty to consider the wider impacts of alcohol availability on population health, community safety and health inequalities. Middlesbrough includes areas of significant deprivation, characterised by poorer living conditions, lower educational attainment and higher unemployment, which are strongly associated with poorer health outcomes. Alcohol- and drug-related crime and adverse health outcomes are disproportionately concentrated within the borough's most deprived wards.

Park Ward falls within this cohort and experiences multiple, overlapping socioeconomic and health inequalities. Evidence demonstrates that alcohol-related harm, vulnerability and dependency are more pronounced in areas where there is the availability of cheap, high-strength alcohol, disproportionately impacting vulnerable individuals and contributing to ongoing community harm.

Alcohol is already widely accessible across Middlesbrough through off-licensed premises, supermarkets and alcohol delivery services. The availability of low-cost, high-strength products encourages consumption based on intoxication value rather than quality, leading to binge drinking, increased alcohol dependence and repeat alcohol-related harm.

High-strength alcohol also significantly increases the risk of alcohol-related liver disease (ARLD), including liver cirrhosis and pancreatitis. Alcohol is classified by the World Health Organization's International Agency for Research on Cancer (IARC) as a Group 1 carcinogen, meaning there is sufficient evidence that it causes cancer in humans. Alcohol consumption increases the risk of multiple cancers, including cancers of the liver, oesophagus, mouth, throat, bowel, breast and stomach.

Following receipt of the application submitted by Mr Suresh, a representative of ARKA LICENSING CONSULTANTS, on behalf of Mrs Arulthas a number of concerns were raised in regard to the application made and the area where the premises are situated.

A meeting was scheduled by Fiona Helyer Middlesbrough Council Principal Licencing Officer for Friday May 22nd May at 09:30 to discuss the application. All parties including, Mrs Arulthas, Mr Suresh from Arka licensing consultants and PC Roberts from Cleveland police Licencing were invited to the meeting however, due to the applicant and Licencing consultant failing to attend, the meeting was rescheduled for Wednesday 27th May 2026 at 1pm.

During the meeting concerns were raised and discussed regarding the area in which the premises are situated, the levels of crime and anti-social behaviour experienced and the associated alcohol related harm. There were also concerns raised around



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the experience, capacity and competence of Mrs Arulthas and her being proposed as the Designated Premises Supervisor (DPS) given that she is already named as the DPS at two other licenced premises.

During the meeting, the following points were discussed:

- Business model including operational procedures and staffing.
- Alcohol availability and products for retail
- DPS's capacity and understanding of their role.
- Cumulative Impact Areas
- Operating schedules and conditions put forward by the applicant within the application.
- Right to work

During the meeting and due to a number of questions asked of Mrs Arulthas there were further concerns raised around her experience and knowledge of the Licensing Act and managing off licensed premises.

On 2 June 2026, Mr Suresh of Arka Licensing Consultants requested an in-person meeting with his applicant. This was subsequently arranged for 9 June 2026 at Middlesbrough Town Hall.

The meeting was attended by the applicant and her consultant, alongside representatives from Police Licensing, Middlesbrough Licensing, and Public Health. This provided an opportunity to meet Mrs Arulthas in person and to gain further insight into her proposed plans for the premises. The same lines of questioning from the previous meeting were explored in order to assess any progression in her knowledge and understanding.

Despite this further opportunity, the concerns previously raised were not alleviated. During questioning, Mrs Arulthas was unable to sufficiently address these concerns or demonstrate the required level of knowledge and experience that you would expect of a proposed PLH/DPS.

The applicant stated she would be the sole person managing the premises, she also advised that she has never managed licensed premises and has no managerial experience, her only experience being as a sales assistant since 2021.

Mrs Arulthas advised that there would be four staff employed at the premises, two full time and two part time members. At present Mrs Arulthas is on maternity leave and has approximately 6 months remaining. There are some concerns around staffing due to Mrs Arulthas indicating that she would not be retaining the existing



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staff, she would be replacing them with people that currently live outside of the Middlesbrough area. She also indicated that her husband who currently manages premises at 108 Ayresome street will oversee this premises whilst she is on maternity leave.


Mrs Arulthas was asked about the role of a DPS and what her responsibilities would be. She advised that she would be delivering all staff training at the premises including Challenge 25, however she was unable to provide a clear and concise explanation of her day-to-day responsibilities which raises concerns around her legal obligations and proactive management control in what may be deemed as a high-risk area.

During the meeting Mr Suresh proposed several additional conditions including that a personal license holder will be on duty at all times the premises are open, not to permit the sale of single cans of beers, lagers and ciders. He also confirmed that

they would not sell beers, lagers and ciders with an ABV content of 6.5% or above. He confirmed that alcohol will be stored in an electrically operated beer cave.

Whilst some of these conditions may assist in promoting the licensing objectives, we consider that any policies, procedures and resources proposed at this late stage in the process are unlikely to be effective, given the lack of knowledge, understanding and experience demonstrated by Mrs Arulthas, together with the limited knowledge of the local area that the staff she intends to employ are likely to possess.

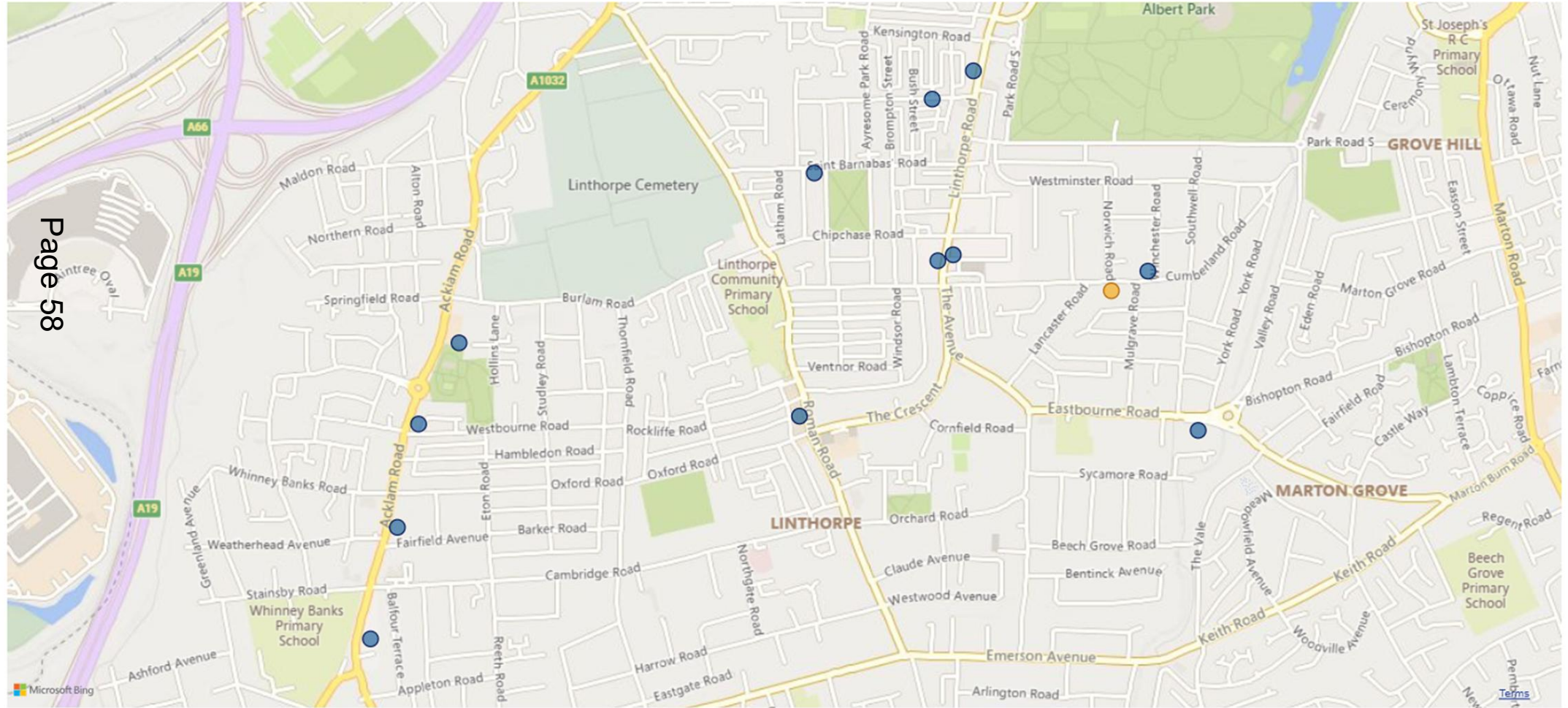
Representatives of Public Health believe that the granting of this licence for the sale of alcohol in Park ward will further undermine the licensing objectives in an area that already experiences high levels of alcohol related crime and disorder, anti-social behaviour and associated health harms.


Signed: 

Dated 22.06.2026

Off License Proposed Application

Proposed application ● N/A ● proposed application



RESTRICTED (when complete)			
WITNESS STATEMENT			
Criminal Procedure Rules, r 27. 2; Criminal Justice Act 1967, s. 9; Magistrates' Courts Act 1980, s.5B			
URN			
Statement of: Amy ROBERTS			
Age if under 18: 0-18 (if over 18 insert "over 18") Occupation: Police Constable			
This statement (consisting of 5 page(s) each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated in it anything which I know to be false or do not believe to be true.			
Signature 	:A Roberts		Date: 23/06/2026
Tick if witness evidence is visually recorded <input type="checkbox"/> (supply witness details on rear)			

I am Police Constable 2495 Roberts with Cleveland Police, currently stationed at Middlesbrough Police Office and attached to the Force Licensing Unit. Part of my role as a Licensing Support Officer is to monitor licensed premises within all four districts of Cleveland Police, focusing on the Middlesbrough area, ensuring that they are trading within the spirit of the four licensing objectives. We will ask that they will not have an adverse effect on the surrounding community or have a negative impact on crime and disorder, public safety or public nuisance objectives and will prevent harm to children.

This statement is in relation to a new application received from Middlesbrough Council regarding Cumberland Convenience Store, 57-59 Cumberland Road, Middlesbrough, TS5 6PN. The applicant is seeking to carry out the licensable activity of the sale of alcohol from 0600 hours to 2300 hours, seven days a week.

Cumberland Convenience Store, 57-59 Cumberland Road, Middlesbrough is situated on a busy residential road, with a mixture of residential, business premises and a primary school which is just a 6-minute walk away. Middlesbrough has two cumulative impact policies in force at this time, one which references on licensed premises and one which

Continuation statement of:

mentions off licensed premises. In both cumulative impact areas, there are already high levels of alcohol related crime and disorder and anti-social behaviour all of which are noted in the Cumulative Impact Policies. This proposed site sits in an area that is within the park ward of the cumulative impact policy. This shows that this area already suffers from high levels of alcohol related crime, disorder and anti-social behaviour. Cleveland Police are of the firm belief that another off licensed premise selling alcohol will only exacerbate the existing problems, by making alcohol more readily available to persons who may already be intoxicated and to vulnerable persons. This is particularly concerning considering more people are consuming their alcohol at home.

Any premises with a premise licence has certain obligations with regards to all the four licensing objectives and the conditions laid down therein. The Applicants agent has offered some conditions in the application which we do not feel goes far enough to address all four licensing objectives taking in to consideration the area in which the store is situated and the issues that area historically and currently has.

The area that the store sits within unfortunately suffers from anti-social behaviour (ASB) and sporadic disorder as well as other incidents. The area also has an issue with street drinking, and whilst this is not of epidemic levels it is of concern and doesn't help the current problems in the area. We find that the street drinkers will always favour single cans of cheaper high ABV alcohol especially ciders / perry and lagers. Many of which come in 500mls plus volume and are cheap to buy in and retail. This is a trend not just in this area but across the Cleveland Police Area. On the same road in close proximity to this premise is a property that houses individuals that have recently been released from prison, and these individuals some of whom are known to be battling with alcohol and substance

Continuation statement of:

abuse and with the premise being so close it could only be a temptation to those suffering and could inevitably lead to the behaviour we are trying to avoid. Also as stated by PCSO MUSGRAVE in her email, Exhibit AR/1 that there are already current problems in the areas of Eastbourne Road and Linthorpe Rad, both of which are situated only 5 mins walk, which with a new premise able to sell alcohol could exacerbate issues resulting in a rise in crime, ASB and drug dealing.

Interrogation of the police systems show that there has been a steady flow of reported incidents of not only crime but also ASB, within the area the store is situated in. It also highlights a number of these incidents being directly linked to alcohol related issues and include people being intoxicated in public, drinking alcohol in the street, those under the influence begging, drug dealing / taking, shouting and swearing in the street. Shoplifting is one of the highest reported alcohol related crimes in the area

A meeting was arranged for Police, Public Health and Council Licensing with the agent and the applicant, but this had to be re-arranged due to technical difficulties. During the second meeting, on Wednesday 27th June 2026, it became apparent that whilst conversations were being held the applicant and proposed designated premise supervisor didn't seem to understand what was expected as part of her role, she couldn't answer simple questions and due to this we the Police don't have confidence in her to run this new premise properly. She is also currently the Designated premise supervisor of two other stores, one of which we as responsible authorities have had concerns over. For someone who had recently completed her personal licence course, she didn't seem to have a grasp of some of the more key aspects of licensing or the knowledge to answer the questions we posed.

Continuation statement of:

On Monday 1st June 2026 the agent sent an email apologising for his client, advising there was some difficulty during the meeting and couldn't hear the questions clearly that were being asked, and the agent has suggested that this is why she didn't answer them correctly. They did suggest the following changes to help meet the concerns we raised.

1. Applicant will only be the DPS to this store - Not others - There will be a variation application be processed this week.
2. Applicant agreed to have condition on ABV of 6.5% on beers, ciders and lagers. This is to address the street drinking concern raised.

On Tuesday 9th June 2026, a further meeting was held in person this time with the agent and the applicant / proposed designated premise supervisor so that it gave them an opportunity to discuss points that were not covered well in the team's meeting on 27th May 2026. During the meeting they offered up the mentioned condition around no sale of high strength ABV and suggested no sale of single cans to address the concerns around attracting street drinkers to the store. They also advised they would offer a condition that when the store is open a personal licence holder will be on duty. They advised that they had sold a premise in another area and the husband of the proposed DPS is going to run the other store within Middlesbrough to allow the proposed DPS to concentrate on this store. They stated that they are going to have 2 full time and 2 part time members of staff but are going to bring in new staff once they take over that are coming from Northampton / Coventry area. Although there is no problem with this it raises concerns as they won't know the local people or have any experience of the local area and the problems that it faces.

Continuation statement of:

I do have further concerns with this application and proposed DPS as, although she has recently undertaken her personal licence course, (I believe this was in November 2025), her knowledge of the licensing objectives and roles and responsibilities that a DPS undertakes seems very limited. I would have expected after the first meeting on 27th May, that the knowledge around the objectives and what is expected could have been answered, but the applicant struggled to answer the simple questions posed. Having experience of working in a shop that sold alcohol since 2021 as a sales assistant should give anyone some knowledge around alcohol sales. I am not sure if this is because she didn't explain herself clearly or if it was just poor knowledge and understanding.

Cleveland Police do not believe that this application adequately address's the licensing objectives and the issue of this premise being in an area which already has a Cumulative impact policy in place. Neither do we have any confidence in the proposed designated premise supervisor in upholding the licensing objectives. Due to our concerns, we have unfortunately no other option but to bring it before the licensing committee to decide what is appropriate for this application.

CUMBERLAD ROAD

From MUSGROVE, Leah (C6559) <Leah.MUSGROVE@cleveland.police.uk>

Date Mon 22/06/2026 13:20

To ROBERTS, Amy (P2495) <Amy.Roberts3@cleveland.police.uk>

Hello,

Just a quick email in relation to some pointers I would like to make you aware of in relation what type of issues an alcohol license in this location would cause to the area.

Over the road there is a probation house which usually houses people with alcohol and substance abuse, This is meters away from this store and would encourage their behavior onto the street.

Also I believe this would encourage street drinkers from the EASTBOURNE ROAD and LINTHOPRE ROAD area to congregate outside this store in the large pavement area. Inevitably crime in the vicinity will rise due to street drinkers behavior such as drug dealing to these undesirables.

I hope this helps, if you need anything else from me please let me know.

Kind regards,

C6559 Leah Musgrove
Police Community Support Officer

Middlesbrough District HQ | Bridge Street West | Middlesbrough | TS2 1AB

Telephone: 01642 303192

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“Delivering outstanding policing for our communities”

POLICING CLEVELAND TOGETHER



PROTECT
PEOPLE



PROTECT
COMMUNITIES



TACKLE
CRIMINALS



BE THE BEST
WE CAN BE

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