

Mr Abuzar Naveed
Lifestyle Express
22-24 Princes Road
Middlesbrough
TS1 4BB

Dated: 19 August 2022

Dear Sir,

LICENSING ACT 2003

Premises: 22-24 Princes Road, Middlesbrough, TS1 3AA

I am writing to advise you that as the Responsible Authority for Public Health a representation has been made to the Licensing Authority in support of the review application made by Cleveland Police in respect of the above premises.

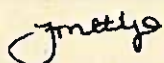
This representation is made in relation to the crime and disorder, public safety, public nuisance and protection of children from harm licensing objectives. There are a number of areas of concern regarding these premises including whether or not the person named on the licence as the designated premises supervisor is indeed in day to day control of the premises and authorising the sale of alcohol.

The operator of the premises has failed to comply with the law in relation to Licensing Act 2003 and they have failed to comply with licensing conditions which are in place to promote the licensing objectives.

There are also concerns around the availability and sale of cheap strong alcohol to those that are vulnerable and the high levels of alcohol related crime and ASB that is being reported in and around the area that these premises are situated.

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

Yours faithfully,



Public Health Officer
Alcohol Control

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

Name of RA Representative: Fiona Helyer

Address: Public Health and Public Protection Service, Civic Centre, Middlesbrough.
Email: EHTS@middlesbrough.gov.uk **Tel** 01642 728717

Licence holder details

Name and Address of Premises

Address: 22-24 Princes Road, Middlesbrough TS1 4BB

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

Mr Abuzar Naveed

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

Lifestyle Express (now known as Princes Rd Convenience Store
MBRO/PR0415/063483

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)

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, Public Safety, Prevention of Public Nuisance and Protection of Children from Harm.

This representation is made to support the review application made by the Police that this licensed premises is being operated in such a manner which presents a risk to the safety of the public and does not support the prevention of crime and disorder, public safety, prevention of public nuisance and the protection of children from harm licensing

objectives.

This store is situated in Newport ward, one of the most deprived areas in Middlesbrough, with high unemployment rates, poor education attainments and poor standards of living, all of which contribute to poor health and wellbeing within families and communities.

Alcohol related crime and poor health standards are visible in this area, with a high density of licensed premises, high levels of alcohol related crime and anti-social behaviour and some of the cheapest alcohol being made readily available for our most vulnerable members of society.

Historically, Newport ward was named within Middlesbrough Council's cumulative impact policy for off licensed premises which lapsed in March 2022. This policy will be reviewed in the near future and evidence is being compiled for Newport ward to be included in any future cumulative impact policy that is agreed and implemented.

Between November 2019 and January 2020 several meetings were held between Police, Public Health, Licensing and Neighbourhood Safety Officers with the named Premises Licence Holder and Designated Premises Supervisor, Mr Abuzar Naveed. These meetings were to discuss a number of complaints that had been received from residents and local businesses involving alcohol related crime and disorder, anti-social behaviour, street drinking and harassment caused to those living or visiting businesses in close proximity to the premises.

In November 2019 an action plan was put in place in an attempt to resolve the issues reported which all parties present at the meeting agreed to. Exhibit Ref FMH/1.

The action plan detailed several points for action that needed to be completed by Mr Naveed in hope that such would stop and prevent the issues experienced in the area from reoccurring. The actions within the plan were monitored by Officers and within a number of weeks there was a significant reduction in the number of complaints being received and in alcohol related crime and ASB being reported in the area.

Meetings with all parties concerned continued, the last one being held in January 2020. Due to the Covid pandemic these premises closed its doors for business and remained closed, opening its doors again between April and August 2021.

In August 2021 Public Health representatives attended the premises to carry out the alcohol survey that had been completed similarly over the past few years. Exhibit ref FMH/2. At this time a male named Mr Zafar Iqbal presented himself as the new premises licence holder and designated premises supervisor, advising officers that he had taken over the lease for the premises and that he was now in day to day control of the premises.

A conversation took place between Public Health Officers and Mr Iqbal around the issues and concerns that had been experienced in the area prior to the Pandemic. Mr Iqbal reassured Officers that alcohol sales would not be the domineering factor in his business

and that his concentration would be around the sales of groceries and household goods.

Following a number of further complaints received more recently from the Council's neighbourhood safety team, again around alcohol related crime and anti-social behaviour including street drinking and harassment, alarm and distress caused to residents and business owners, I attended the premises on Friday 15 July 2022 in company with PC Thorpe from Cleveland Police and Nicola Kenny, a Middlesbrough Council Neighbourhood Safety Officer.

Whilst waiting for officers to arrive at the premises, people were observed drinking outside of residential premises, directly opposite the shop. They were all intoxicated, talking loudly, swearing and acting in a drunken manner. Officers also witnessed an incident involving a drunken female member of this group who approached a lone female walking in the street. The drunken female began to shout, waving her arms in the air before pushing the female and accusing her of stealing from her. This incident was diffused by Police Officers in attendance resulting in the street drinkers being dispersed.

Officers attended the premises and spoke to Mr Iqbal who advised once again that he was the owner of the business, had taken on the lease for the premises and was paying the rent. He confirmed that Mr Abuzar Naveed, the person named on the premises licence as the premises licence holder and designated premises supervisor was no longer in day to day control of the premises and that it was he who was authorising the sale of alcohol.

Alcohol being sold from the premises at the time included the sale of Perry items. A condition of the premises licence includes that 'No Perry will be stocked or sold from the premises at any time'. Displaying and selling such products from the premises is a clear breach of licensing conditions.

There were other products of note that would be deemed as attractive to those who are vulnerable through alcohol dependency. These included a number of strong white ciders and super strength products that were being sold for as little as £1.00 per 500ml can. Whilst at the premises a number of people entered the store purchasing such products. The majority of these people were intoxicated and vulnerable due to their alcohol dependency.

Whilst at the premises a request was made to view CCTV footage to check that the condition was being complied with. Mr Iqbal was unable to demonstrate this as he was unable to operate the system.

As a result of information received, Mr Iqbal was advised to stop selling alcohol from the premises as it was suspected that there was no designated premises supervisor in place authorising the sale of such products.

Checks were later made with the Council's Licensing team and it was confirmed that a transfer application had not been received by the licensing authority transferring the premises licence to Mr Iqbal, nor had there been an application to vary the Designated

Premises Supervisor.

On Tuesday 19 July 2022 officers from Middlesbrough Council's Licensing and Public Health attended the premises to carry out a full licensing inspection to ensure that all conditions of the premises licence were being complied with. Officers were unable to establish whether the CCTV system was recording and retaining footage as Mr Iqbal and other staff were unable to demonstrate this once again.

During the visit Officers were shown copies of the refusals book, incident log and staff training records. Photographs were taken by officers at the time to evidence what had been produced as the training records were limited, there were no incidents recorded in the incident book and there were limited refusal entries. A number of photos were also taken of the alcohol products containing high ABV content on sale at the time (Exhibit ref FMH/3).

Whilst at the premises I contacted Mr Naveed by telephone and held a brief conversation with him before passing the telephone to Tim Hodgkinson, Middlesbrough Council's Licensing Manager. Mr Naveed told me that he was still the named Premises Licence Holder and Designated Premises Supervisor and that he was still in day to day control of the premises.

Several customers, all of whom were intoxicated entered the store while officers were present, asking for the cheap cans of white cider. Mr Iqbal advised them that he was no longer selling them. One male was carrying a lit cigarette and was asked to put it out. He began asking questions and started to express his opinion, raising his voice about not being able to buy the cans of cider that he wanted.

On Wednesday 20 July 2022 Police, Licensing and Public Health officers attended the premises and met Mr Naveed, Mr Iqbal was also present. During this visit to the premises it was identified that the refusals log and staff training records had been amended. Photographs were taken of the amendments (exhibit FMH/4) and the books/documents were later seized by Police. Both Mr Naveed and Mr Iqbal were unable to demonstrate that the CCTV was recording and retaining evidence. Mr Naveed advised that there had been a power cut days earlier but was unable to provide any details of the work that had been carried out on the CCTV system.

Once again there were several vulnerable people coming in to the store, all of whom were intoxicated and wanting to purchase the cheap cans of white cider. A female known to neighbour safety officers as being alcohol dependant purchased a bottle of wine instead.

Later the same day Mr Naveed at Council Offices at Civic Centre, Middlesbrough where he met with Police, Licensing, Public Health and Neighbour Hood Safety Officers. During the meeting Mr Naveed confirmed that he no longer held the lease for the business at 22-24 Princes Road and that Mr Iqbal had taken the lease over April 2021. He confirmed that he did not manage or pay the staff working at the premises nor did he order and pay for any stock. He advised that he attended the premises approximately twice a week for a period of 1-2 hours to make sure that everything was in order. He also advised that he

currently works a part time job elsewhere.

A copy of the lease was requested and has since been received. It confirms that Mr Zafar Iqbal is named as the lease holder for the premises. Mr Naveed advised that he had agreed to remain on the premises licence as the named premises licence holder and designated premises supervisor until a transfer application was completed.

The Licensing Act clearly sets out the role of a designated premises supervisor (DPS) and states that the DPS is the person who has day-to-day responsibility for the running of the business. The person chosen to be designated premises supervisor (DPS) will act as primary contact for local government and the police. They must understand the social issues and potential problems associated with the sale of alcohol, and also have a good understanding of the business itself.

There are concerns around whether Mr Naveed is in day to day control due to the lack of presence, authority and control that he has displayed at the premises and also his lack of knowledge and understanding of the issues surrounding the premises. The breaches of licensing conditions that have been identified are also of concern. Illegality in one area of the law may demonstrate a willingness to contravene other areas of legislation including the sale of alcohol to drunken/vulnerable people.

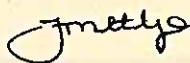
Responsibility in the operation of a licensed premises and the sale of alcohol from a licensed premises is paramount in this ward. It is the responsibility of the Premises Licence Holders/Designated Premises Supervisors and staff working at the premises to ensure that they uphold the licensing objectives. Conditions attached to the Premises Licence must be complied with at all times as this gives the assurance that the law is complied with, the licensing objectives are being promoted and any risks to members of the public are reduced.

Given the number of complaints received from residents and nearby businesses it is apparent that there is a clear lack of control at the premises which has resulted in the licensing objectives, namely crime and disorder, public safety, prevention of public nuisance and protection of children from harm being undermined.

This representation is made to support the review application made by the Police to ensure that that this licensed premise does not continue to operate in such a manner which presents a risk to the safety of the public and undermines the licensing objectives.

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

Signed:



Dated 19.08.22

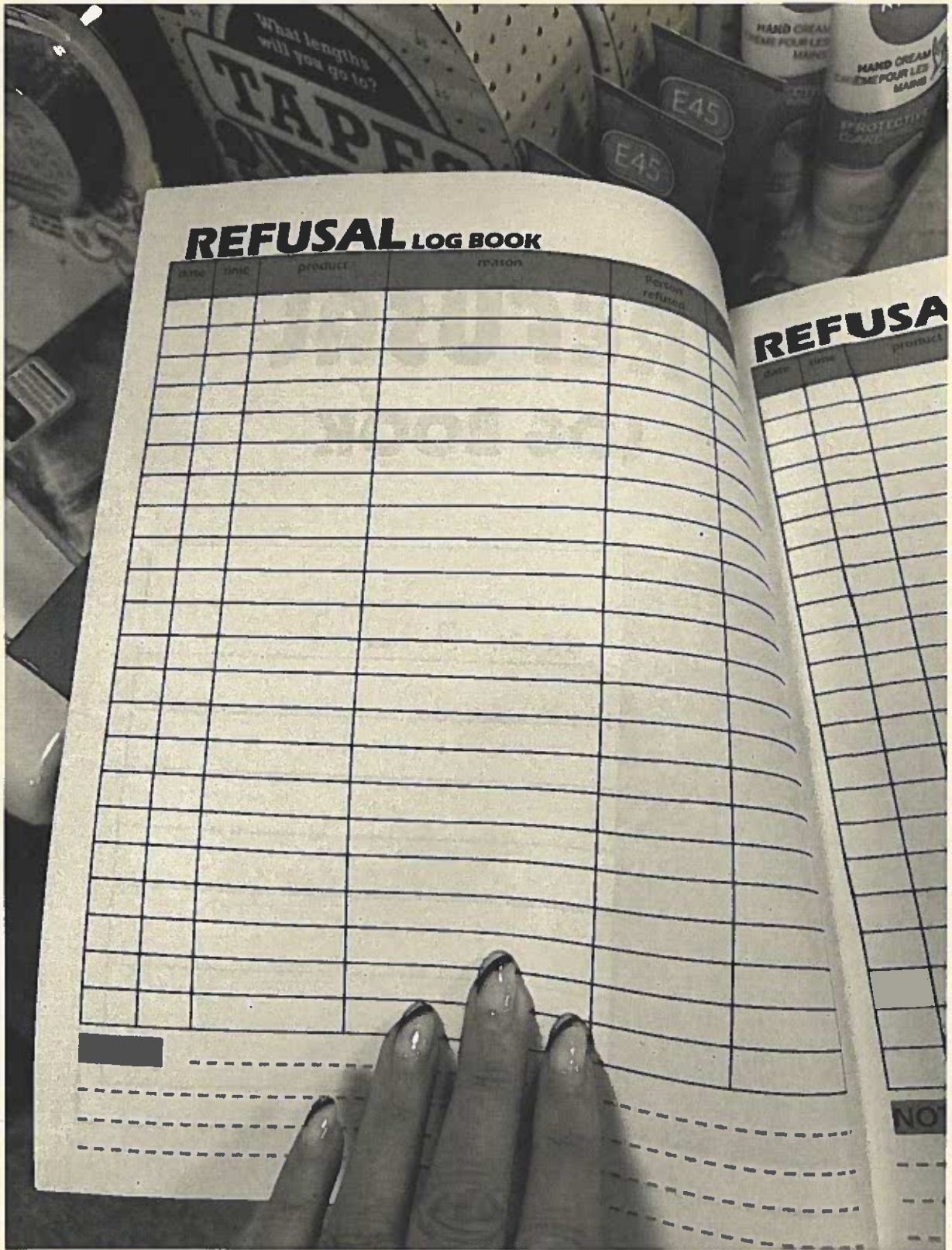
Action Plan for Premier Store, Princes Road, Middlesbrough

Action	Lead	Progress	Status
<p>1. To monitor and record any incidents or activity in the incident book relating to alcohol related crime and anti-social behaviour that occurs internally and externally. All details will be recorded including the time and date of the incident and what action was taken by the member of staff on duty.</p>			
<p>2. To record any refusals of alcohol sales in the stores refusals book, including the name of person being refused if known and the time and date</p>			
<p>3. To display Challenge 21 posters in and around the store</p>			
<p>4. To ensure that Part B of the Premises Licence is on display within the store and to keep Part A in a place known to staff for the purpose of a licensing inspection.</p>			
<p>5. To produce a barring system that includes the use of a book for recording names of person barred from the premises, date barred and reasons why, how long they will be barred for.</p>			
<p>6. All staff will be trained on the use of the CCTV monitoring system enabling them to show Police, licensing or any of the other responsible authorities CCTV footage if the need arises.</p>			
<p>7. Staff training records will be monitored and kept up to date by the premises licence holder. These will be kept on the premises for the purpose of licensing inspections</p>			

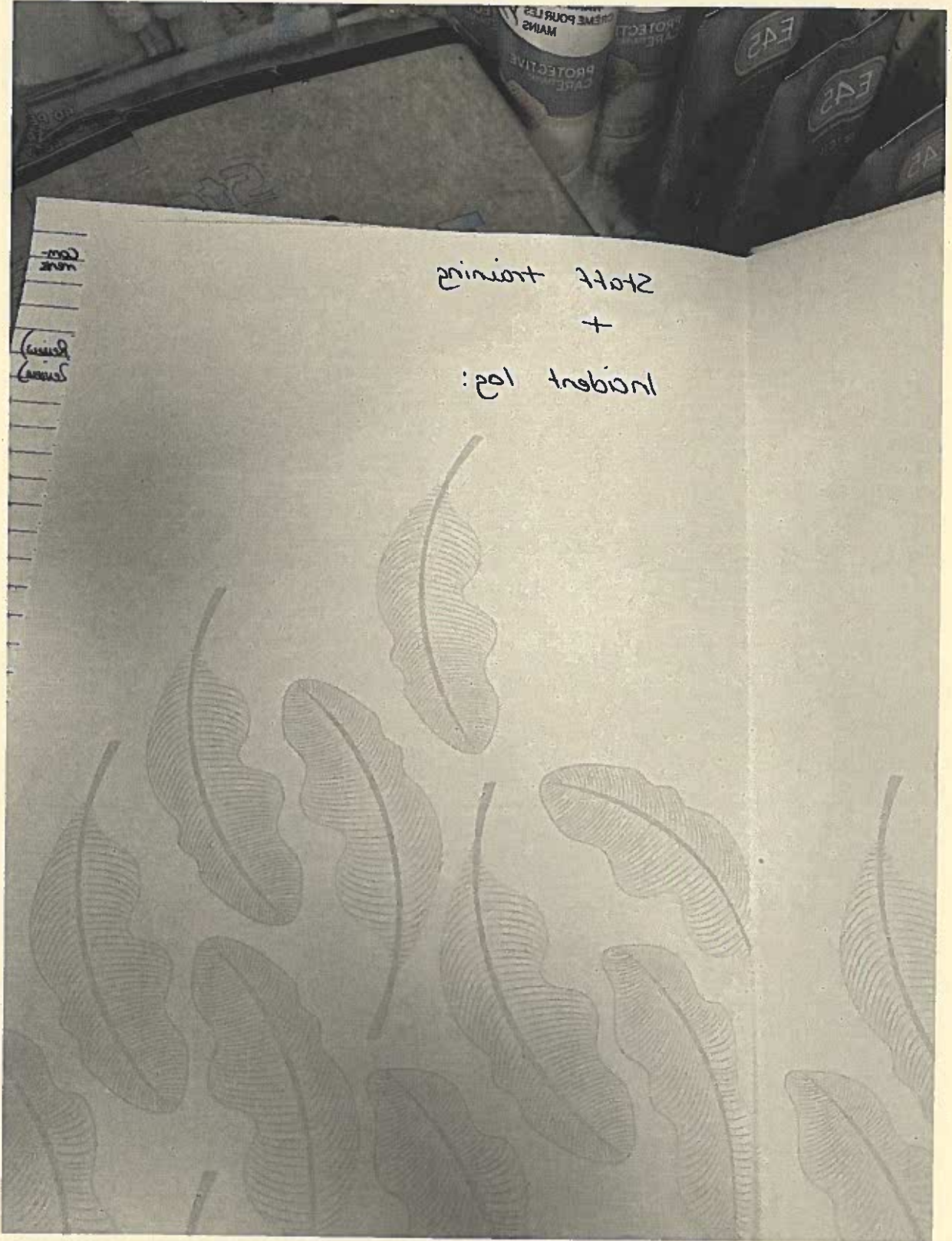
Action Plan for Premier Store, Princes Road, Middlesbrough

8. The premises licence holder will research alternative alcohol products to stock and sell from the premises to prevent the sale of white ciders that have an alcohol content of 7.5% and above.			
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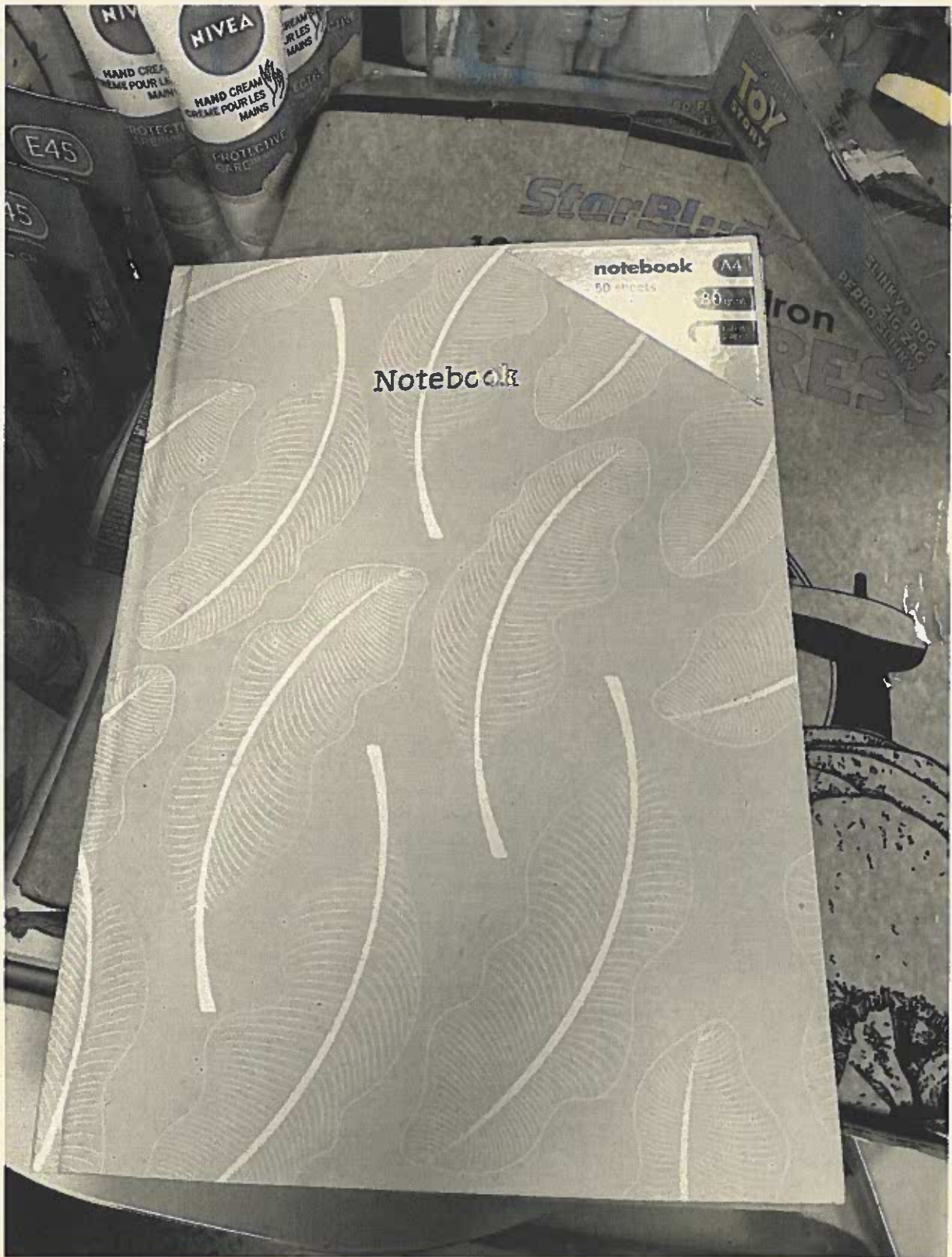
Name of Premise Licence Holder
22-24 Princes Road
AULTON PARADE
Signed:
Date: 29/10/19
Name of Officer present
Scott Lawrence
Signed:
Date: 29/10/19



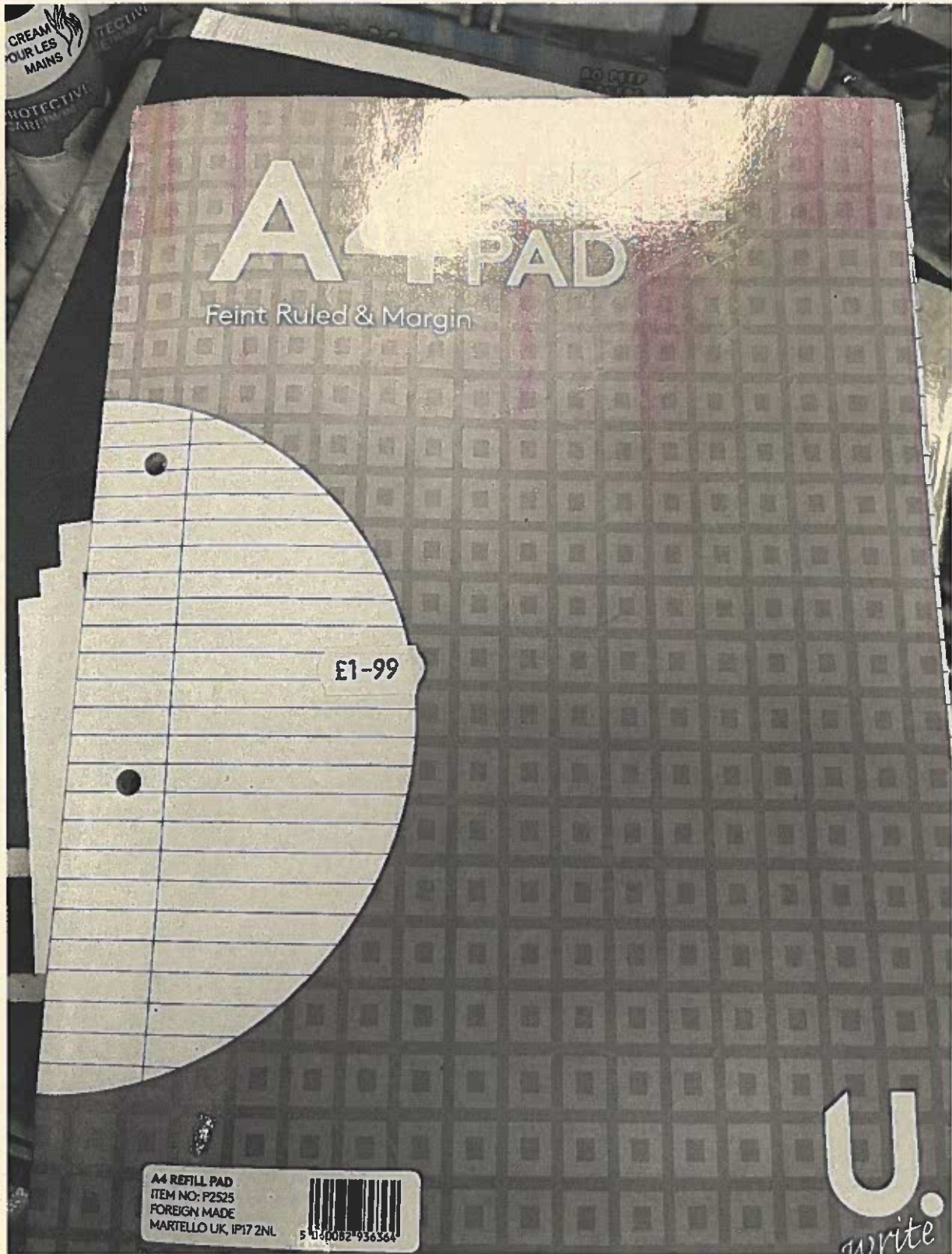


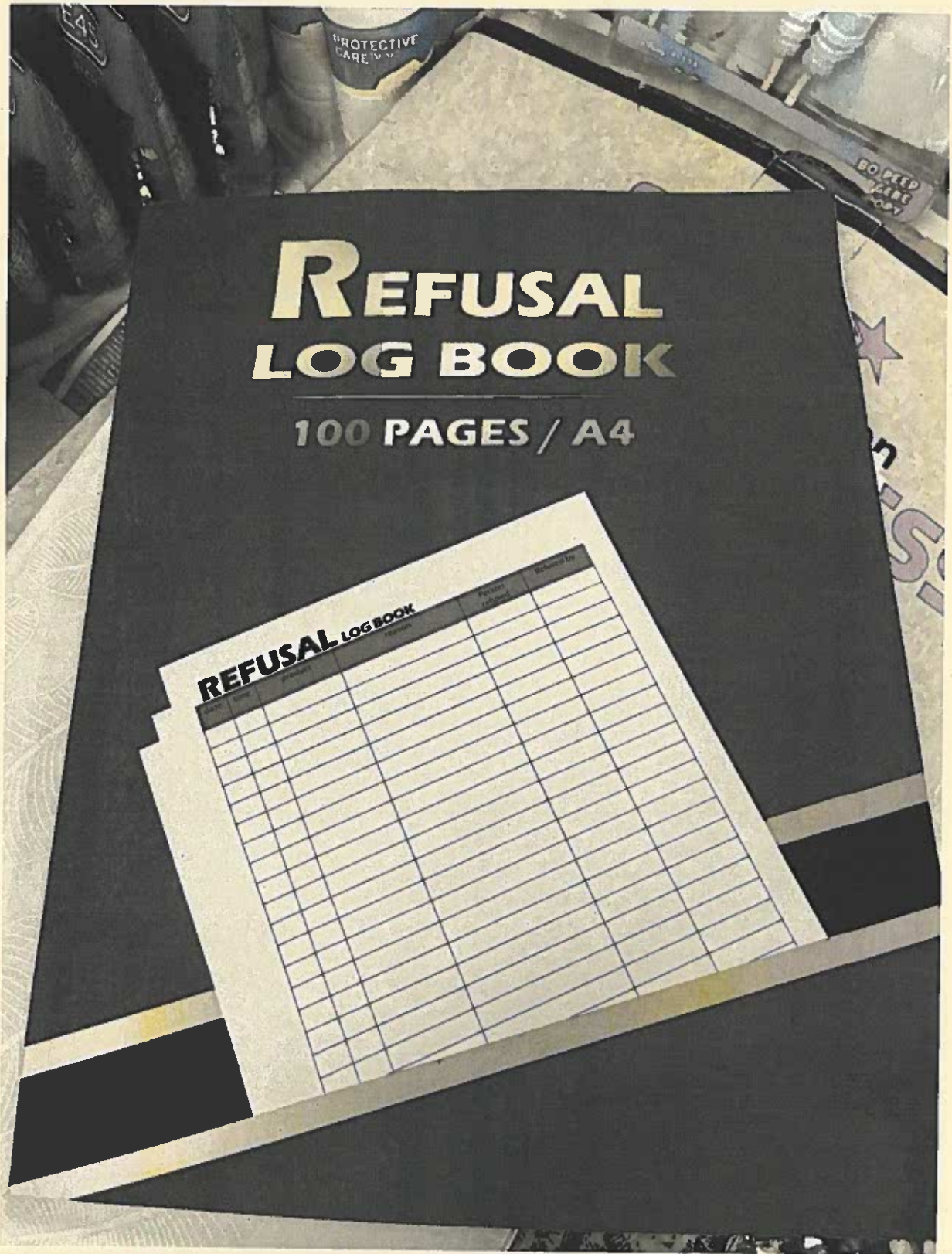


Staff training
+
Incident log:

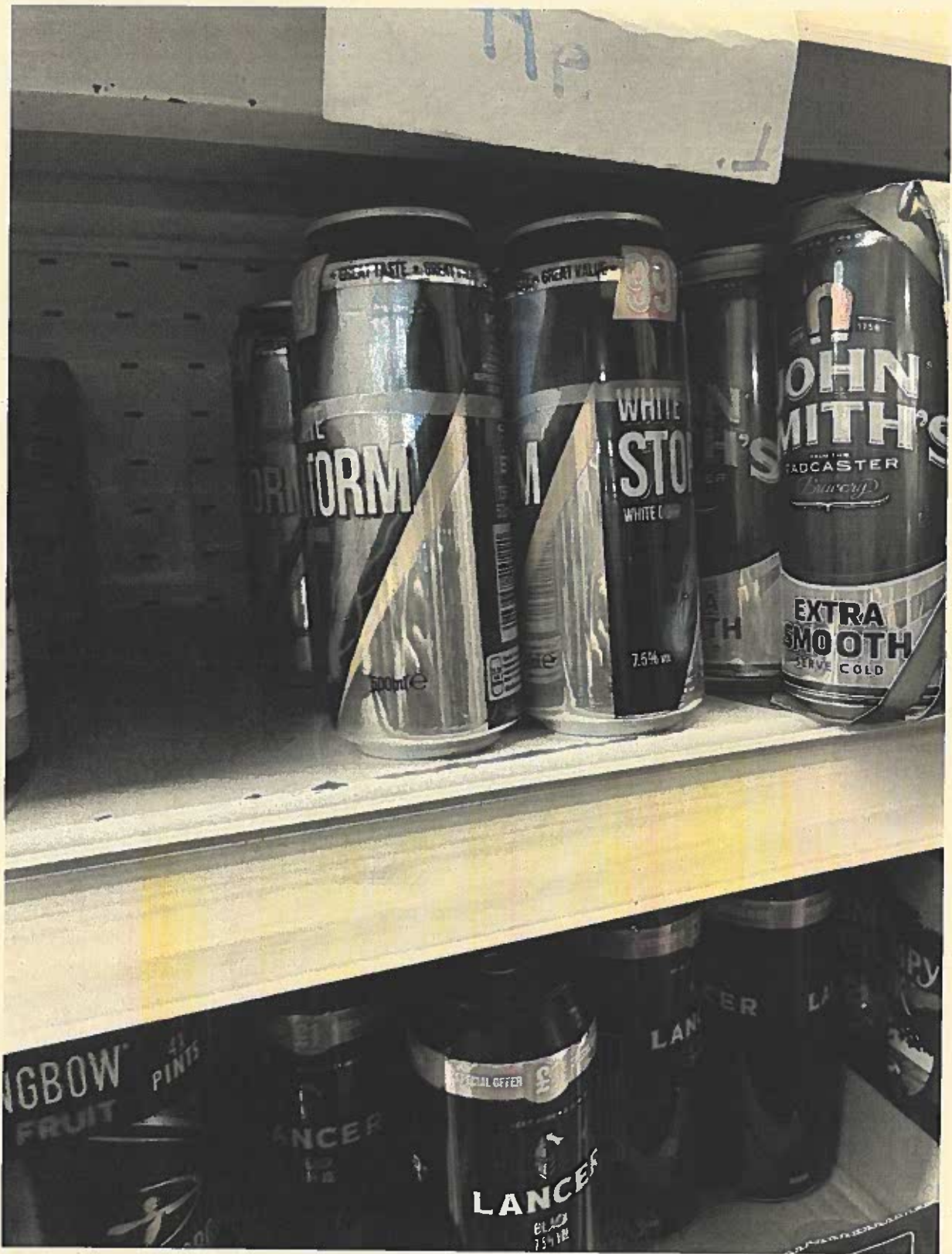


Staff name	training Completed	trained by	Date	Signed comments
ZAFAR IQBAL	✓	A. NAVEED	June 21	PP
ANEES IQBAL	✓	A. NAVEED	June 21	PP
SAMYUKTHA GOPAL	✓	P. GOPAL	08/20/22	P. Gopal (Review)
MICHAEL DASS	✓	P. GOPAL	08/20/22	P. Gopal (Review)





















STELLA .440
4 FOR £5.00
£1.31 EACH

CARLING FRESH
4 FOR £5.49



REFUSAL LOG BOOK

Date	Time	Product	Reason	Person refused	Refused by
02/08/21		Cigarettes	too young (no id)	M	Z.106AL
17/08/21		Alcohol	A NO id	F	Z.106AL
28/08/21		Alcohol	NO id	M	Z.106AL

Date	Time	Product	Reason	Person Refused	Refused by
July 3rd 21	9:00pm	cigarette	no id	Male	Z.106AL
16/08/21	16:30	cigarette	no id	Female	Z.106AL
3/08/21	17:35	alcohol	no id	Female	Z.106AL
23/09/21	19:50	alcohol	no id	Male	P.106AL
11/10/21	21:25	cigarettes	no id	Male	Z.106AL
3/11/21	18:30	matches	no id no id underage	Male	Z.106AL
18/12/21	17:50	alcohol	drunk	Male	Z.106AL
20/12/21	19:43	alcohol	no id	Female	Z.106AL

NOTE

2.106AL
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20
FIT
HEALTH





REFUSAL LOG BOOK

date	time	product	reason	Person refused	Issued by
06/07/19	09:00	cigarette	no id	Male	Z. 10/000
16/07/19	16:30	cigarette	no id	Female	Z. 10/000
21/07/19	17:55	alcohol	no id	Female	Z. 10/000
23/07/19	18:30	alcohol	no id	Female	Z. 10/000
10/08/19	12:25	cigarettes	no id	Male	P. 10/000
31/08/19	18:30	matches	no id	MALE	Z. 10/000
10/09/19	17:50	alcohol	drunk	MALE	Z. 10/000
20/09/19	19:43	alcohol	no id	MALE	Z. 10/000
				Female	Z. 10/000

REFI

date	time
02/08/19	
17/08/19	
25/08/19	

Date

July

16/08

NOTE

REFUSAL LOG BOOK

date	time	product	reason	Person refused	Refused by
06/08/21		Cigarette	too young (no id)	M	Z.108AL
17/08/21		Alcohol	A no id	F	Z.108AL
26/08/21		Alcohol	no id	M	Z.108AL

Date	time	Product	Reason	Person Refused	Refused by
July 3rd 21	9:00pm	cigarette	no id	Male	Z.108AL
16/08/21	16:30	cigarette	no id	Female	Z.108AL
3/08/21	17:55	alcohol	no id	Female	Z.108AL
3/09/21	19:50	alcohol	no id	Male	Z.108AL
11/08/21	21:25	cigarettes	no id	Male	Z.108AL
3/11/21	18:30	matches	no id no id underage	Male	Z.108AL
18/12/21	17:50	alcohol	drunk	Male	Z.108AL
20/12/21	19:43	alcohol	no id	Female	Z.108AL

NOTE

Additional Evidence presented by Middlesbrough Council, Responsible Authority for health, against the application for a premises licence in respect of premises situated at 22-24 Princes Road, Middlesbrough the Licensing Act 2003

Further to the representation and evidence submitted on behalf of Middlesbrough Council's Public Health on 19 August 2022 in respect of The Princes Road Convenience Store I wish to add the following:

The impact of alcohol misuse is broad, often hidden and adversely affects individuals, families and communities in many ways, with the harm being disproportionately greater for vulnerable and disadvantaged communities. It impacts upon a number of Council services as well as the NHS, Police, Criminal Justice System, Education, Voluntary and Community sector.

The cost of alcohol misuse was estimated to cost the economy in England up to £25 billion per year and for Middlesbrough a total of £56.5 million which included costs relating to health, social care, crime and licensing. It costs the NHS over £3.5 Billion year.

More than 9 million people in England drink more than the recommended daily limits. 24.3% adults in Middlesbrough drink more than 14 units alcohol week, with 19.9% adults identified as binge drinking.

People in Middlesbrough are more likely to die of alcohol related conditions or specific reasons compared to England or the region.

In 2020, Middlesbrough had an alcohol-related mortality rate per 100,000 of 55.9 per 100,000 which was higher than the North East rate of 49 per 100,000, significantly higher than the England rate of 37.8 and the 6th highest nationally. The rate of hospital admissions for alcohol-related conditions in 2020/21 was also significantly higher in Middlesbrough compared to England with a rate of 1,957 per 100,000 compared to 1,500 nationally.

The rate of admission episodes for alcohol-specific conditions in under 18s for the period 2018/19 – 20/21 was 35.6 per 100,000, higher than the England rate of 29.3 per 100,000.

Middlesbrough has the second highest rate in the North East for the number of premises licensed to sell alcohol per square kilometre with a rate of 7.7, significantly higher than the England rate of 1.3.

This store is situated in Newport ward, one of the most deprived areas in Middlesbrough, with high unemployment rates, poor education attainments and poor

standards of living, all of which contribute to poor health and wellbeing within families and communities. It is licensed for the off sale of alcohol from 7am – 10pm seven days a week.

Alcohol related crime and poor health standards are visible in this area, with a high density of licensed premises, high levels of alcohol related crime and anti-social behaviour and some of the cheapest alcohol being made readily available for our most vulnerable members of society.

Historically, Newport ward was named within Middlesbrough Council's cumulative impact policy for off licensed premises which lapsed in March 2022. This policy is being reviewed and evidence is being compiled for Newport ward to be included in any future cumulative impact policy that is agreed and implemented.

Newport ward remains one of the most deprived wards in Middlesbrough that has suffered over a number of years and continues to do. The facts are that this area still has a high density of licensed premises, high levels of alcohol related crime and disorder and anti-social behaviour and a high prevalence of alcohol related harm.

The following table shows the distribution of all licensed premises and off licensed premises in Middlesbrough. Both Newport and Central wards, highlighted in yellow are adjoining wards and have the highest number of off licensed premises out of the 20 wards in Middlesbrough.

Wards	Number of licensed premises in Middlesbrough	Number of off licensed premises in ward areas
Acklam	16	3
Ayresome	6	4
Berwick Hills & Pallister	14	7
Brambles & Thorntree	17	7
Central	180	27
Coulby Newham	15	6
Hemlington	8	3
Kader	5	5
Ladgate	8	4
Linthorpe	12	6
Longlands & Beechwood	19	8
Marton East	10	2
Marton West	4	1
Newport	54	19
North Ormesby	26	10
Nunthorpe	4	2

Park	52	11
Park End & Beckfield	19	12
Stainton & Thornton	4	1
Trimdon	3	3
<i>Total Number of licensed premises</i>	476	141

The following table shows alcohol related crimes for all 20 ward areas in Middlesbrough over a 3 year period from 2018/2019/2020. Throughout this period Newport ward had the second highest levels recorded. The adjoining Central ward had the highest levels of alcohol related crime recorded across the three years.

AR-Crime			
Ward	2017-18	2018-19	2019-20
Acklam	11	21	13
Ayresome	30	47	48
Berwick Hills & Pallister	91	135	155
Brambles & Thortree	119	151	133
Central	458	516	447
Coulby Newham	49	45	47
Hemlington	48	80	68
Kader	26	17	19
Ladgate	37	44	46
Linthorpe	28	29	25
Longlands & Beechwood	107	155	142
Marton East	17	27	12
Marton West	8	16	13
Newport	223	261	262
North Ormesby	86	115	114
Nunthorpe	8	8	7
Park	99	109	81
Park End & Beckfield	79	129	133
Stainton & Thornton	11	8	9
Trimdon	11	9	18
Unknown Ward	1	4	3
<i>CIP Zone</i>	278	287	218
All AR-Crimes (not inc CIP)	1547	1926	1795

Newport has the 2nd highest concentration of licensed premises. The adjoining Central ward has the highest concentration of licensed premises including on/off licences, pubs/clubs, restaurants, hotels and late night refreshment venues. The number of licensed premises in both Newport and adjoining Central ward equates to nearly 50% of all licensed premises in Middlesbrough.

The following table shows alcohol related anti-social behaviour for all 20 ward areas in Middlesbrough over a 3 year period from 2018/2019/2020. Newport ward, which borders Central ward, had the second highest levels recorded. Central ward had the highest levels of alcohol related Anti-Social Behaviour (ASB) across the three years.

AR-ASB			
Ward	2017-18	2018-19	2019-20
Central	361	373	241
Newport	124	134	109
Longlands & Beechwood	76	69	50
Park End & Beckfield	46	57	30
North Ormesby	59	50	33
Park	80	55	30
Berwick Hills & Pallister	46	50	36
Brambles & Thorntree	45	53	22
Hemlington	40	27	27
Ladgate	20	16	13
Coulby Newham	25	22	12
Kader	12	12	4
Acklam	21	14	9
Marton East	20	13	5
Ayresome	10	15	13
Marton West	5	13	10
Linthorpe	13	4	13
Trimdon	12	9	7
Nunthorpe	7	4	3
Stainton & Thornton	4	9	4
Unknown Ward	1	3	0
<i>CIP Zone</i>	<i>287</i>	<i>308</i>	<i>193</i>
All AR-ASB (not inc CIP)	1027	1002	671

Alcohol related crime and ASB has a significant impact on our NHS services including local A&E departments.

The Hospital Intervention Liaison Team (HILT) sits within Accident and Emergency unit James Cook Hospital to assess those patients accessing the hospital with drug and/or alcohol issues. They engage, support and make referrals into community services where needed.

Between April 21 and March 2022 HILT assessed 819 patients in total from the Middlesbrough area.

The following table shows the number of patients living in both Newport and Central wards of Middlesbrough (postcode starting with TS1) that were assessed by HILT in JCUH during this period.

Patients living in TS1 identified as suitable for HILT	116
Alcohol Only	75
Presenting with both Alcohol & Drug misuse	41

Throughout 2020 and to date there has been an alarming rise in the numbers of people choosing to drink at home during the Covid-19 pandemic.

An alcohol study completed in 2021 by Teesside Universities researchers with Middlesbrough residents across all ward areas, provides evidence that people in Middlesbrough are drinking more at home due to the pressures and anxiety brought on by the Covid-19 pandemic, including, financial pressures, unemployment, social isolation and daily routines being disrupted. For whatever reason, it is believed that alcohol in many of these cases was being used as a coping mechanism.

Between February and September 2020 deaths caused by alcohol hit a new record high in England and Wales and high-risk drinking increased by almost 90%. It was estimated there were 8 million people drinking at higher risk levels, with alcohol treatment services struggling to cope.

Between 1 May 2020 and 18 November 2020 there were 9 deaths recorded in Middlesbrough where alcohol had been a contributing factor. A further 43 drug related deaths were recorded between 8 January 2021 – 14 April 2022 in Middlesbrough, where alcohol was the sole or additional contributing factor. Almost 50% (19 deaths) were recorded from both Newport and Central wards.

- A proportion of individuals were alone in a property at time of death
- These deaths occurred during a period where pubs have been closed.
- The number of arrests of some individuals also indicate a potentially different user group/cohort.
- Cocaine or prescription medicines were often quoted alongside alcohol use. It's rare that a drug related death has a single substance detected so it is likely alcohol has been taken alongside other drugs.

In 2021 Middlesbrough Council's Alcohol and Substance Misuse treatment services were working with approximately 1,360 clients. During 2020 there was a steady increase in the numbers accessing services for the following reasons:

- Those that had been abstinent for a number of years had relapsed
- Those using opioids/non opioids where alcohol had also become a problem
- Those processed through the Criminal Justice System for alcohol related crime and issued an Alcohol Treatment Referral (ATR).

A review of alcohol treatment and recovery services in Middlesbrough has been completed and a new integrated service continues to provide specialist treatment and aftercare for those suffering with alcohol dependency whilst focusing around the hidden harms often associated with alcohol consumption including domestic abuse and homelessness.

Over the past few years there has been an increase in the levels of alcohol related domestic abuse right across the UK. Such incidents often result in injury which not only impacts on a person's physical health but can have a long lasting impact on mental health and wellbeing, including for those who are witness to such incidents of violence.

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 making it easy for those who are vulnerable and suffering with alcohol addiction to access.

Survey work carried out in Middlesbrough 2015/16 found that alcohol was being sold as cheaply as 13p/unit. A more recent survey completed in 2021/22 shows a slight rise, increasing the unit cost to 18p.

This increase falls in line with a number of factors including; the introduction of the cumulative impact policy in 2016 for off licensed premises, reviewing licenses of problematic premises, working alongside retailers to promote responsible retailing and imposing or agreeing conditions that help to limit the sales of cheap, strong alcohol products especially in areas that suffer from high levels of alcohol related crime and disorder, anti-social behaviour and health harms.

Responsibility in the operation of a licensed premises and the sale of alcohol are paramount. It is imperative that staff in control of any licensed premises act responsibly to ensure that their premises manage the sale of alcohol, their customers and any vulnerability issues accordingly.

In our opinion the applicant has failed to demonstrate this and has undermined the licensing objectives.

Signature:

metty

Dated: 23 September 2022