



## **Licensing Sub Committee Hearing Panel**

Date: Wednesday, 27 September 2023  
Time: 10.20 am (or at the rise of the Licensing & Appeals  
Sub-Committee Hearing Panel)  
Venue: Council Antechamber, Level 2, Town Hall Extension

This is a **supplementary agenda** containing additional information about the business of the meeting that was not available when the agenda was published

### **Access to the Council Antechamber**

Public access to the Council Antechamber is on Level 2 of the Town Hall Extension, using the lift or stairs in the lobby of the Mount Street entrance to the Extension.  
**There is no public access from any other entrance of the Extension.**

## **Membership of the Licensing Sub Committee Hearing Panel**

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**Councillors** - Grimshaw, Flanagan and Hewitson

## Supplementary Agenda

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6. **Application for a Premises Licence Variation - Mini Megasave, 81 Cross Lane, Manchester, M18 8NY** 3 - 12  
Contains new information from Department of Public Health, Manchester.

## Further Information

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For help, advice and information about this meeting please contact the Committee Officer:

Ian Smith  
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This supplementary agenda was issued on **Wednesday, 20 September 2023** by the Governance and Scrutiny Support Unit, Manchester City Council, Level 2, Town Hall Extension (Library Walk Elevation), Manchester M60 2LA

## ***INSERT NAME OF RESPONSIBLE AUTHORITY -*** **REPRESENTATION**

<b>About You</b>	
Name	<i>Dr Laura Parker</i>
Address including postcode	4 <sup>th</sup> Floor Manchester Town Hall Extension Lloyd Street Manchester
Contact Email Address	Laura.parker@manchester.gov.uk
Contact Telephone Number	

<b>About the Premises</b>	
Application Reference No.	291601
Name of the Premises	<i>Mini Megasave</i>
Address of the premises including postcode	81 Cross Lane Manchester M18 8NY

<b>Your Representation</b>	
Please outline your representation below and continue overleaf. This should describe the likely effect of the grant of the licence on the licensing objectives on and in the vicinity of the premises in question.	
<p>This application is for an extension of operating hours to 24-hour sale of alcohol and for online delivery of alcohol. Public health feel that the granting of this licence in its current form could undermine the following licensing objectives:</p> <ol style="list-style-type: none"> <li>1. Prevention of crime and disorder</li> <li>2. Prevention of public nuisance</li> <li>3. Protection of children from harm</li> </ol>	

Gorton and Abbey Hey has the 4<sup>th</sup> highest deprivation score in Manchester, meaning it is in the top 20% of the most deprived neighbourhoods. Data from Change Grow Live (CGL), the drug and alcohol treatment provider for Manchester, also shows that Gorton and Abbey Hey has the 4<sup>th</sup> highest number of people currently in alcohol treatment, a rate of 69.9 per 10,000 people. Extended hours of operation may lead to increased consumption of alcohol in the population and residents from Gorton and Abbey Hey are more likely to be vulnerable to alcohol related harm.

Gorton and Abbey Hey already have a substantial number of premises that are open late at night and has the 6<sup>th</sup> highest percentage of premises licensed to operate late at night in the city. On Cross Lane alone there are already 2 other off licensed premises, a pub open until midnight, and a bar that is open until 2am. Existing research suggests that a higher density of alcohol licensed premises is associated with higher levels of binge drinking and violence. Data from the ONS also show the proportions of violent incidents that were alcohol-related increased as the afternoon and evening progressed, from 23% of violent incidents occurring between noon and 6pm, to 52% were between 6pm and 10pm and 83% occurred between 10pm and midnight. Therefore, granting the extension of hours could increase residents' exposure to violence and crime.

Children are at risk of alcohol related harm through both direct and indirect means. In Manchester, there were 135 alcohol-related hospital admission episodes in people under 18 recorded between 2018/19 to 2020/21. This translates to a rate of 36.6 per 100,000, statistically significantly higher than the national average (29.3 per 100,000). Data from 2018-2019 NDTMS (National Drug Treatment and Monitoring Services) also estimates 1692 adults dependent on alcohol live with children in Manchester, resulting in an estimated 2,770 - 3,008 children being directly impacted by alcohol misuse in the home. Furthermore, 794 children in need assessments performed in Manchester cited alcohol misuse by a parent as an issue. The application for online alcohol delivery does not provide enough information about the training of staff to ensure deliveries are not made to underage or intoxicated individuals. Furthermore, it is not stipulated that alcohol will not be delivered to house parties causing a public nuisance. Therefore, granting this application in its current form may result in additional alcohol-related harm to children and may also cause public nuisance.

We ask that an extension of operating hours is not granted. We also ask that further information is provided by the applicant regarding the training to be given to delivery staff prior to granting a licence for online delivery, which, if successful, should be limited to current operating hours (Mon – Sun 8am-10pm). This should include assurances that deliveries are refused in situations where there is evidence of alcohol-related nuisance or disorder or where people appear drunk. In addition to ensuring alcohol is delivered to the same person who placed the order, the application should also clearly state delivery drivers will adhere to the Challenge 25 scheme to ensure anyone under 25 will need to provide documented proof that they are aged 18 years or over and that delivery drivers will only accept proof of age from the following documents - a passport, photo card driving licence, an EU/EEA national ID card or similar document, an HM Forces warrant card, or a card bearing the PASS hologram. A refusals log should also be kept by delivery drivers. This must include the date and time of the incident, a description of the customer, the name of the staff member who refused the sale, and the reason the sale was refused. All entries must be made within 24 hours of the refusal and the record must be made available for inspection and copying within 5 working days of a request by an officer of a Responsible Authority.

**Dear Sir/Madam**

**Re: Representation from the Public Health Department at Manchester City Council regarding the application for Mini Megasave application number 291601**

I, Dr Laura Parker, on behalf of Public Health and the Director of Public Health, have made a representation in relation to the application for an extension of hours to an existing licence for the premises at 81 Cross Lane, Manchester, M18 8NY.

Public health recognises the important role that licensed, and off-licensed premises play in the local economy and for local residents. However, based on the latest available evidence summarised in the attached report, we feel that the granting of this license in its current form could undermine the following licensing objectives:

1. **Prevention of crime and disorder**
2. **Prevention of public nuisance**
3. **Protection of children from harm**

The application, if successful, would enable the sale of alcohol 24 hours a day, both in store and via online delivery, in an area of Manchester that already suffers disproportionately from the effects of alcohol-related harm. I am concerned that approving the proposed extension of hours would not only undermine the above licence objectives but will negatively impact and significantly disadvantage the local community. This could exacerbate inequalities in our city and undermine the core principles and values of the city's action plan to tackle said inequalities, "Making Manchester Fairer" (1).

Yours Sincerely,

Dr Laura Parker  
Public Health Registrar

## REPORT

**Public Health Evidence in Response to Licence Application 291601****19/09/2023****Prepared by: Dr Laura Parker****Introduction**

This brief report is in response to a recent application for a premise licence variation to sell alcohol 24 hours a day, to include provision for online sales, from Mini Megasave in Gorton and Abbey Hey, Manchester. The report includes a summary of the available evidence on alcohol-related harm and specific concerns linked to the licensing objectives.

**Alcohol-Related Harms in Manchester and Abbey Hey**

Previous research has shown there is a link between increased availability of alcohol and increased alcohol consumption (2,3). However, the impacts of alcohol consumption in a population are not felt equally across society. Increased levels of deprivation are associated with increased levels of alcohol-related harm. Higher rates of deaths from alcohol and higher rates of alcohol-related hospital admissions have been reported in more deprived areas, despite similar or lower levels of alcohol consumption when compared to less deprived areas (4,5). In the UK, alcohol-specific mortality was reported as 5.5 times higher in the most deprived communities, despite a higher proportion of the population from the least deprived communities drinking above recommended limits (6,7).

The extent of place-based deprivation is calculated using a range of metrics including health, crime, income, employment, housing, and education. Manchester is ranked the 6<sup>th</sup> most deprived local authority in England (8) and of all 32 wards in Manchester, Gorton and Abbey Hey has the 4<sup>th</sup> highest deprivation score, meaning it is in the top 20% of the most deprived neighbourhoods. Therefore, residents from Manchester, and in particular Gorton and Abbey Hey, are more likely to be vulnerable to alcohol-related harms.

There were 2,286 alcohol-related admission episodes in Manchester recorded from 2021-2022 (9), which translates to a directly standardised rate of 554 per 100,000 (9). This is significantly higher than both the national (494 per 100,000) and regional (511 per 100,000) average (9). Data from Change Grow Live (CGL), the Drug and Alcohol Treatment provider for Manchester, has shown, out of all 32 wards, Gorton and Abbey Hey have the 4<sup>th</sup> highest number of people in Alcohol Treatment (10). We have an excellent service supporting residents through alcohol treatment in Manchester, and one service user told our service provider: *“My whole experience from the initial meeting to this day has been nothing but positive and professional, but also incredibly caring and supportive.”* (11). However, approving licences that allow the provision of alcohol 24 hours a day, to include door to door delivery, increases the availability of alcohol and does not foster a supportive environment for people who are dependent on alcohol and need to reduce their drinking. Research has shown the 24-hour provision of alcohol

facilitated drinking, particularly for those who already drank heavily or have a history of alcohol dependence (12-14).

Many people suffering harm due to alcohol misuse do not enter treatment; therefore, the treatment numbers for Gorton and Abbey Hey may not necessarily reflect the level of hidden harm being experienced by residents who may be dependent on alcohol but have not presented for treatment. Alcohol-related harm also extends beyond the individual, impacting both the family unit and wider community.

### Location and Licensed Premises Density

Existing research suggests that a higher density of alcohol licensed premises is associated with higher levels of binge drinking and violence (15,16). In Gorton and Abbey Hey there are already 63 licensed premises. This results in a licence density of 16.2 establishments per 10,000 residents and 29.6 establishments per Sq Km. 46% of licensed premises in Gorton and Abbey Hey already operate with late-night opening. Therefore, approving the extension of hours would further saturate this market and compound existing problems associated with late night opening. Figure 1 shows the location of the premises for which the application has been submitted in relation to other licensed premises.

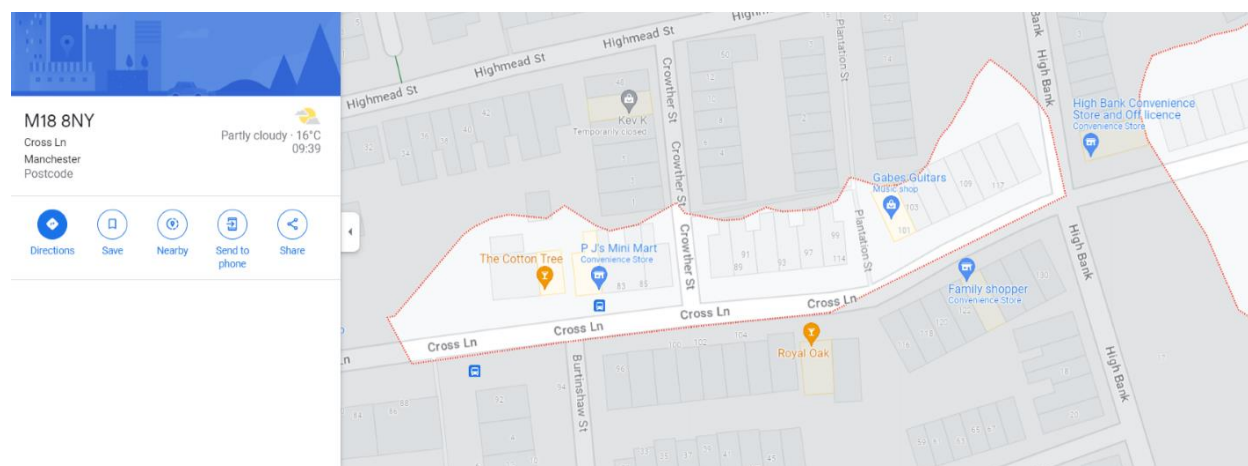


Figure 1: Map showing location of of the premises for which the application has been submitted in relation to other licensed premises

The area also has 94.4 households per 10,000 residents living in temporary accommodation, the 3<sup>rd</sup> highest rate in Manchester. Research has shown that homelessness and alcohol misuse are linked, thus individuals residing in temporary accommodation may be more vulnerable to alcohol-related harm (17,18). Therefore, granting approval for the sale of alcohol 24 hours a day in this area is likely to cause disproportionately more harm to the local community, concerns echoed by local residents in their own representations.

In addition to being able to purchase alcohol from the shop 24 hours a day, the licence application requests permission to provide online delivery services 24 hours a day. A recently published scoping review that considered the public health impacts of the online delivery of fast food and alcohol found

that “Services that deliver alcohol on-demand can also subvert current alcohol access restrictions, particularly through poor age verification processes” indicating “that on-demand services are likely to be worsening existing health issues and inequities for consumers, due to enhanced access” (19). Moreover, research from New Zealand found the use of online alcohol delivery services was associated with heavier drinking patterns and the purchase of alcohol when respondents said they otherwise would have stopped drinking (20). Given the way app technology works, any online alcohol deliveries are more likely to be to the local area, thus increasing alcohol consumption in the local population and, again, disadvantaging the local community that is already suffering from a disproportionate level of alcohol-related harm.

## Crime and Disorder

Alcohol and violence are intricately linked. Victims of violent crime perceived the offender or offenders to be under the influence of alcohol in over half of all violent incidents reported in the Crime Survey for England and Wales (21). The survey also reported 70% of violent incidents that occurred in the evening or night were alcohol-related (21).

The proportions of violent incidents that were alcohol-related reported in the survey increased as the afternoon and evening progressed. 23% of violent incidents occurring between noon and 6pm involved alcohol, whereas 52% between 6pm and 10pm, 83% between 10pm and midnight, and 84% between midnight and 6am (21), depicted in the graph below (Figure 2).

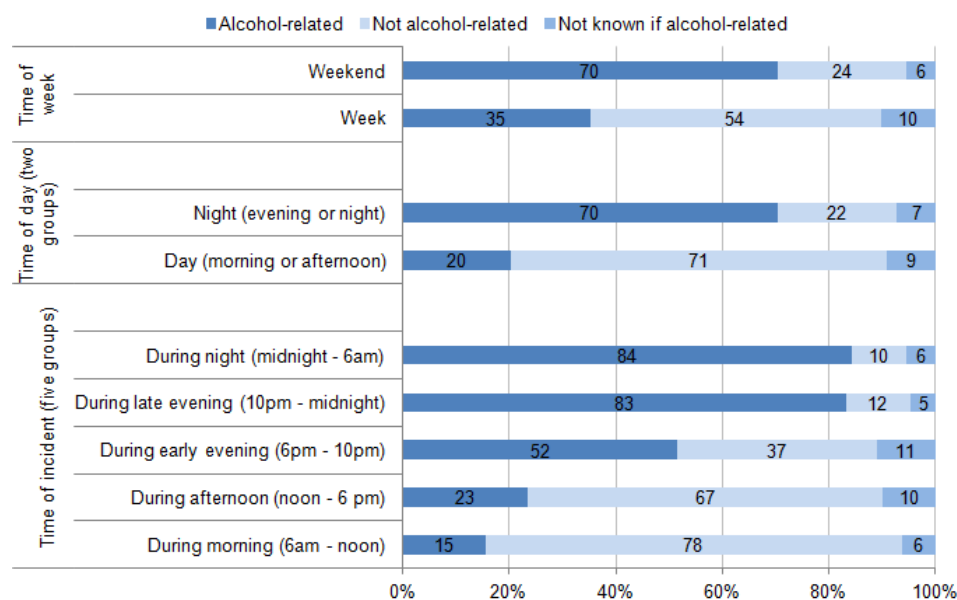


Figure 2: Timing of violent incidents, according to whether victim perceived offender(s) to be under the influence of alcohol, combined data for 2012/13 and 2013/14 CSEW (REF 21 ONS)

In addition to an increased frequency of violent crime, the survey reported that when injuries were sustained, these were typically more severe in incidents of alcohol-related violence compared with other violent incidents (21). Victims in alcohol-related violent incidents were more likely to have



received cuts, to have suffered concussion, or to have experienced a loss of consciousness because of the incident (21).

Research findings have also raised concerns there is an association between the increased availability and consumption of alcohol, seen for example during premier league football matches, and increased incidences of domestic violence, most recently described in a report exploring the reported number of incidents of domestic abuse following football matches in Manchester (22).

Granting approval for extension of hours may increase alcohol consumption in the population and increase the number of people consuming alcohol late at night. This in turn may subject residents and visitors to an increased risk of alcohol-related violence and crime, including domestic abuse.

### **Public Nuisance**

The application does not provide assurances that the delivery of alcohol late at night will not cause public nuisance. A judgement passed by Julia Newton (District Judge for the Magistrates Courts) in September 2021 upheld the findings of an earlier hearing at Camden council in August / Sept 2020, that rejected the application for 24-hour alcohol delivery in the area, highlighting concerns of noise nuisance at the point of delivery and an acknowledgement that the area local to the shop will be disproportionately impacted due to the way the apps work. (23)

In their Statement of Licensing Policy, Manchester City Council stipulates that applicants must provide assurance that there will not be deliveries of alcohol to addresses already causing public nuisance, such as house parties (24). However, no such assurances have been provided in this application.

### **Protection of Children from Harm**

Children are at risk of alcohol-related harm through both direct and indirect means.

In Manchester, there were 135 alcohol-related hospital admission episodes in people under 18 recorded between 2018/19 to 2020/21 (9). This translates to a rate of 36.6 per 100,000, statistically significantly higher than the national average (29.3 per 100,000) (9). The process described by the applicant for the delivery of alcohol ordered online does not stipulate that delivery drivers will perform a challenge 25 assessment to those they are delivering alcohol to, nor does it state that they will refuse the delivery of alcohol to those who cannot produce valid forms of identification or are found to be intoxicated. This means safeguards to prevent the sale of alcohol to those aged under 18 or intoxicated are insufficient. From the same judgement mentioned earlier in the report, Julia Newton (District Judge Magistrates Court) also highlighted concerns regarding alcohol deliveries, namely about the lack of control the applicant has over the delivery drivers and therefore the risk that alcohol could be sold to people who were intoxicated or underage (23). These concerns are further supported by research from Wrexham Glyndŵr University which found that in 72% of cases where alcohol was ordered for delivery the alcohol was handed over to the 18- and 19-year-old test purchasers without the delivery driver seeking proof of age (25).

Children who do not consume alcohol themselves may also experience alcohol-related harm through indirect means. Data from 2018-2019 National Drug Treatment and Monitoring Services (NDTMS) estimates 1692 adults dependent on alcohol live with children in Manchester (26), resulting in an estimated 2,770 - 3,008 children being directly impacted by alcohol misuse in the home (26). Furthermore, 794 children in need assessments performed in Manchester cited alcohol misuse by a parent as an issue (26). Living with an adult who misuses or is dependent on alcohol is regarded as an 'Adverse Childhood Experience' (ACE) (27). As previously described, allowing the sale of alcohol 24 hours a day may facilitate heavier drinking, particularly in those with a history of alcohol dependence, and thus increases the risk of children in the local population experiencing ACEs. In 2019, Manchester City Council published a strategy outlining how it wished to approach ACEs and become a trauma informed city (28). Granting this license may therefore not only undermine the licensing objective to protect children from harm but undermines the ACE-aware and trauma informed city strategy.

As previously mentioned, there is a concern that increased alcohol consumption due to increased availability of alcohol may result in increased incidences of domestic violence. Local data gathered in 2019 showed that 1 in 4 incidents of domestic abuse in Manchester occurred in the presence of a child (29). Witnessing and experiencing domestic abuse can have significant physical and mental health impacts on both adults and children (30). Exposure to domestic violence has also been identified as an ACE (27). Therefore, granting this application and increasing the availability of alcohol by allowing the sale of alcohol 24 hours a day may lead to increased domestic abuse, causing harm to any children who are subjected to or witness such abuse. Again, this not only undermines the licensing objective to protect children from harm but undermines the ACE-aware and trauma informed city strategy (28).

### **Summary**

The council has a committed action plan related to "Making Manchester Fairer" (1). However, given the evidence outlined above, I am concerned that approving the extension of hours to allow the sale and door to door delivery of alcohol 24 hours a day in this area could harm the local population, exacerbate inequalities in the city, and compromise the following licencing objectives:

- 1. Prevention of crime and disorder**
- 2. Prevention of public nuisance**
- 3. Protection of children from harm**

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