



## **Licensing Sub Committee Hearing Panel**

Date: Monday, 30 January 2023

Time: 10.00 am

Venue: Council Antechamber, Level 2, Town Hall Extension

Everyone is welcome to attend this committee meeting.

### **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 entrances of the Extension.**

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

---

Councillors - Andrews, Evans and Lyons

## Agenda

---

**1. Urgent Business**

To consider any items which the Chair has agreed to have submitted as urgent.

**2. Appeals**

To consider any appeals from the public against refusal to allow inspection of background documents and/or the inclusion of items in the confidential part of the agenda.

**3. Interests**

To allow Members an opportunity to [a] declare any personal, prejudicial or disclosable pecuniary interests they might have in any items which appear on this agenda; and [b] record any items from which they are precluded from voting as a result of Council Tax/Council rent arrears; [c] the existence and nature of party whipping arrangements in respect of any item to be considered at this meeting. Members with a personal interest should declare that at the start of the item under consideration. If Members also have a prejudicial or disclosable pecuniary interest they must withdraw from the meeting during the consideration of the item.

**4. Application for a New Premises Licence - Merkur Slots, 67 Deansgate, Manchester, M3 2BW**

5 - 136

The report of the Director of Planning, Building Control and Licensing is enclosed.

**5. Application for a New Premises Licence - Go Local, 210 Wilmslow Road, Manchester, M14 6LF**

137 - 296

The report of the Director of Planning, Building Control and Licensing is enclosed.

## Information about the Committee

---

The Licensing Sub-Committee Hearing Panel fulfills the functions of the Licensing Authority in relation to the licensing of premises.

A procedure has been agreed which governs how the Panel will consider such applications.

Decisions made by the Panel will be under delegated authority and will not require to be referred to the Council for approval. Meetings are controlled by the Chair, who is responsible for seeing that the business on the agenda is dealt with properly.

Copies of the agenda are published on the Council's website. Some additional copies are available at the meeting from the Governance Support Officer.

The Council is concerned to ensure that its meetings are as open as possible and confidential business is kept to the strict minimum. When confidential items are involved these are considered at the end of the meeting at which point members of the public are asked to leave.

Smoking is not allowed in Council buildings.

Joanne Roney OBE  
Chief Executive  
Level 3, Town Hall Extension,  
Albert Square,  
Manchester, M60 2LA

## Further Information

---

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

Callum Jones  
Tel: 0161 234 4940  
Email: [callum.jones@manchester.gov.uk](mailto:callum.jones@manchester.gov.uk)

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

This page is intentionally left blank

**Manchester City Council  
Report for Resolution**

**Report to:** Licensing Subcommittee Hearing Panel – 30 January 2023

**Subject:** Merkur Slots, 67 Deansgate, Manchester, M3 2BW  
Application ref 280378, Premises Licence (new), class C05 Bingo

**Report of:** Director of Planning, Building Control & Licensing

---

**Summary**

Application for the grant of a new premises licence made under the Gambling Act 2005, which has attracted objections.

**Recommendations**

That the Panel determine the application.

---

**Wards Affected:** Deansgate

---

**Contact Officers:**

Name: Fraser Swift  
Position: Principal Licensing Officer  
Telephone: 0161 234 1176  
E-mail: premises.licensing@manchester.gov.uk

Name: Helen Howden  
Position: Technical Licensing Officer  
Telephone: 0161 234 4294  
E-mail: premises.licensing@manchester.gov.uk

---

**Background documents (available for public inspection):**

- Manchester City Council statement of Gambling Policy 2019 – 20211
- The Gambling Act 2005

**1. Introduction**

- 1.1. On 17/ 9/2022, an application for the grant of a Premises Licence under the Gambling Act 2005 was made in respect of, Merkur Slots, 67 Deansgate, Manchester, M3 2BW in the Deansgate ward of Manchester.
- 1.2. A 28-day public consultation exercise was undertaken in accordance with Gambling act 2005 regulations; requiring the application to be advertised by the displaying of a notice at or on the premises and a notice published in a newspaper or similar circulating in the local area.
- 1.3. Where an application is made to a licensing authority for a premises licence, an interested party or responsible authority in relation to the premises may make representations in writing to the licensing authority.
- 1.4. Relevant representations have been received in respect of this application and so it must be determined by a Licensing Hearing Panel in accordance with the Council’s Constitution.

**2. The Application**

- 2.1. A copy of the application is attached at **Appendix 1**.
- 2.2. The applicant is Merkur Slots UK Limited.
- 2.3. The activity applied for is Bingo.
- 2.4. The applicant has provided the following documents which are attached at **Appendix 2**:
  - Local Area Risk Assessment
  - Copy of Merkur Slots UK Limited’s Operational Standards
  - Copy of Merkur Slots UK Limited’s ‘Working Together’
- 2.5. A location map of the premises is attached at **Appendix 3**

**3. Relevant Representations**

- 3.1. A total of four relevant representations were received in respect of the application (**Appendix 4**).
- 3.2. Representations were received from the following:
  - The Licensing Authority
  - Greater Manchester Police
  - Manchester City Council Licensing and Out of Hours Compliance Team
  - Manchester City Council Public Health Team
- 3.3. Summary of the representations

Below is a summary of representations received only. Copies of the representations are included for members and other interested parties, to refer to as necessary, at **Appendix 4**.

Party	Grounds of representation	Recomm-
-------	---------------------------	---------

		<b>ends</b>
<b>Licensing Authority</b>	<p>The Licensing Authority has concerns that granting this licence in its current form would not be "in accordance with" Social Responsibility Code 9.1.2 – Bingo.</p> <p>These concerns are elaborated on under a number of headings, the main points of which are summarised as:</p> <ul style="list-style-type: none"> <li>• Substantive facilities for non-remote bingo - The proposal does not appear to provide substantive facilities for non-remote bingo.</li> <li>• Gaming machines -it is essential to know the degree of gaming machine provision, as this has a direct correlation with the number of 'harder' gaming machines that can be provided in this premises, which in turn, has an impact on the risks posed to the licensing objectives. The representation references the Council's Licensing policy and is not satisfied that points made within it are addressed.</li> <li>• Supervision - The risk assessment fails to adequately "assess the level of risk" of the hazards identified. Failing to adequately assess the level of risk compromises the ability to define "suitable supervision" as required by the Social Responsibility Code of Practice.</li> <li>• Aim to permit principle and ability to request further details – the licensing authority is entitled to request such information from operators as they may require to make effective licensing decisions. The representation finishes by asking a number of questions to ascertain in detail how the premises will operate – for example what machines will be in place and how will the premises will be laid out; how and where will people play bingo; the ratio of types of machines; controls in place; and staffing and security arrangements.</li> </ul>	Not stated, further information asked for
<b>Greater Manchester Police</b>	<p>The application doesn't specify the times that the premises will be open or the times that licensable activities will be taking place making it difficult to determine the impact that the premises will have in the area.</p> <p>The risk assessment states that there will be times when the premises will be single staffed. GMP don't think that a single staff member is sufficient to operate the premises in this area.</p> <p>There no mention of security staff which causes GMP concern particularly when the premises is single staffed.</p> <p>Given the nature of the area, GMP would look for a more</p>	Refuse

	robust Risk Assessment which includes security and no single staffing to satisfy our concerns.	
<b>Licensing and Out of Hours Compliance Team</b>	<p>The risk assessment has failed to identify factors in the area that this team considers relevant. These factors include the levels of anti-social behaviour and criminal activity, drinking and drug dealing in the vicinity, and an alleyway next to The Slug and Lettuce which is close to the proposed premises.</p> <p>No conditions are proposed in relation to the use of SIA registered door staff, despite reference being made to the use of panic alarms giving direct contact with the police. Single staffing is also a concern - the applicant has not demonstrated how leaving one member of staff on the premises will be able to deal with people who are involved in anti-social behaviour and/or criminality, along with preventing entry for anyone under the age of 18 and identify vulnerable people who are at risk and/or experiencing problem gambling.</p> <p>LOOH are not confident that consideration has been given to the local area with regard to the issues of anti-social behaviour/criminality, the night time economy and public sector resources.</p>	Refuse
<b>Public Health Team</b>	<p>The public health team consider that the application does not sufficiently demonstrate consistency with the objective of protecting children and other vulnerable persons from being harmed or exploited by gambling. Points made on the representation are as below. The representation is accompanied by a report which highlights evidence relating to gambling harms in Manchester and the contribution impact in granting this application is likely to have on vulnerable groups.</p> <ul style="list-style-type: none"> <li>• The application does not adequately assess the potential risks to the local population in relation to harms from gambling.</li> <li>• Insufficient detail of the number and type of 'gaming machines' which are considered to be one of the most harmful gambling products suggests there will be an increased exposure to harmful gambling products to the local population.</li> <li>• The provisions in place for age verification do not provide the necessary detail and assurance that under 18's will not participate in gambling.</li> <li>• The application does not provide details to support mitigation in the eventuality of risks to staff safety.</li> <li>• Individuals seeking treatment support for gambling harms is significantly lower in relation to those experiencing harms; and additional exposure to</li> </ul>	Not stated



	harmful gambling products is likely to negatively impact on these numbers.	
--	--	--

- 3.4. Agreements have not been reached between the parties
- 3.5 Following the end of consultation, the applicant has provided an updated Local Area Risk Assessment and has offered additional conditions. This information is included at **Appendix 5**.
4. **Key Policies and Considerations**
- 4.1. In exercising their functions under the Gambling Act 2005, licensing authorities must have regard to the licensing objectives in relation to premises licences, temporary use notices and certain permits.
- 4.2. Those objectives are:
- a) preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
  - b) ensuring that gambling is conducted in a fair and open way
  - c) protecting children and other vulnerable persons from being harmed or exploited by gambling
- 4.3 Section 153 of the Act provides that in exercising its functions under Part 8 of the Act (premises licensing and provisional statements), the Licensing Authority shall aim to permit the use of premises for gambling in so far as it thinks that to do so is:
- a) in accordance with relevant codes of practice issued by the Gambling Commission;
  - b) in accordance with guidance issued by the Commission;
  - c) reasonably consistent with the licensing objectives (subject to (a) and (b) above); and
  - d) in accordance with the Licensing Authority Statement of Policy published by the authority (subject to (a) to (c) above).
- 4.4 Section 153 applies to a licensing authority's relevant functions under Part 8 of the Act (ie applications for the grant, variation, transfer, reinstatement or review of premises licences and provisional statements). Its effect is that, whilst in such circumstances there is a presumption in favour of permitting the relevant premises to be used for gambling, the licensing authority may not do so unless satisfied that such use would be in accordance with the guidance issued by the Gambling Commission, any relevant Commission code of practice and its own statement of licensing policy as well as reasonably consistent with the licensing objectives.
- 4.5 In reaching a view that the grant of a licence is in accordance with such guidance, code of practice or policy statement, a licensing authority is, in common with all such public authority decision makers, under a duty to act fairly and rationally.
- 4.6 In cases where an authority is concerned whether a grant would be in accordance with, for example, the Guidance issued by the Gambling Commission, this can be resolved by the imposition of appropriate licence conditions.
- 4.7 In the unlikely event that a licensing authority perceives a conflict between a provision of a Commission code of practice or the Guidance issued by the Gambling Commission and its own policy statement or view as to the application

of the licensing objectives the structure of section 153 makes it plain that the Commission's codes and Guidance take precedence.

- 4.8 Section 153 also makes it clear that in deciding whether to grant a licence, a licensing authority must not have regard to the expected demand for gambling premises that are the subject of the application.
- 4.9 All licensing determinations should be considered on the individual merits of the application.
- 4.10 The Panel's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve. Findings on any issues of fact should be on the balance of probability.
- 4.11 It is important that a licensing authority should give comprehensive reasons for their decision in anticipation of any appeals.
- 4.12 Failure to give adequate reasons could itself give rise to grounds for an appeal.
- 4.13 **Manchester Statement of Gambling Policy**
- 4.14 The Licensing Authority is required to take into account the following when taking decisions in respect of premises licences:
- a) Relevant Gambling Commission Codes of Practice
  - b) Relevant Gambling Commission Guidance
  - c) Reasonable consistency with the Licensing Objectives (subject to a and b)
  - d) Our gambling policy (subject to a – c)

It is important for us to have clear guidelines as to how we will make decisions about premises licence applications. In this way we can be consistent and ensure the committee have clear reasons for decisions taken. Each application for a premises licence will be considered on its merits; applicants are expected to show how they will address the licensing objectives, in order to be granted a licence. Where applicants fail to demonstrate this, licence conditions can be imposed or the application rejected.

- 4.15 The location of gambling premises The location of gambling premises will be considered when determining whether the location of proposed gambling premises is acceptable (with or without conditions) in light of the licensing objectives. Relevant considerations to the location of the premises will be set out in the local area profile but applicants are not restricted to those matters and it is proper that they address all matters they consider appropriate for the licensing objectives. They may also wish to liaise with the responsible authorities, local residents, councillors and businesses in considering whether any additional matters may be relevant. The Licensing Authority will not have regard to demand in assessing the suitability of location for gambling premises.
- 4.16 We will expect operators to take account of the risk factors identified in the local area profile but also to undertake their own assessment into the local area as circumstances can change over time. Operators should identify the relevant risks and put in place appropriate safeguards relative to them. Equally, risk

assessments for existing premises should take into account previous experience of operating and react accordingly. In any case, the local risk assessment should demonstrate how vulnerable people shall be protected.

We will expect risk assessments to also consider local levels of:

- Deprivation

- Crime and disorder

- Demographics in relation to vulnerable groups

- The location of services for children such as schools, leisure centres, entertainment venues, and other areas where children will gather and any regular/seasonal variations e.g weekends, school holidays.

Operators are encouraged to have regard to the local area risks identified in conjunction with the general considerations set out at 4.6 and specific considerations for individual premises types below to put in place appropriate safeguards for the promotion of the licensing objectives. For example, in areas of elevated risk or areas experiencing issues of crime or antisocial behaviour, a high ratio of staffing or increased security measures may be appropriate.

**4.17 The Panel is asked to determine the application.**

This page is intentionally left blank

**Application for a premises licence  
under the Gambling Act 2005 (standard form)**

**PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST**

If you are completing this form by hand, please write legibly in block capitals using ink. Use additional sheets if necessary (marked with the number of the relevant question). You may wish to keep a copy of the completed form for your records.

Where the application is—

- In respect of a vessel, or
- To convert an authorisation granted under the Betting, Gaming and Lotteries Act 1963 or the Gaming Act 1968,

the application should be made on the relevant form for that type of premises or application.

**Part 1 – Type of premises licence applied for**

Regional Casino <input type="checkbox"/>	Large Casino <input type="checkbox"/>	Small Casino <input type="checkbox"/>
Bingo <input checked="" type="checkbox"/>	Adult Gaming Centre <input type="checkbox"/>	Family Entertainment Centre <input type="checkbox"/>
Betting (Track) <input type="checkbox"/>	Betting (Other) <input type="checkbox"/>	

Do you hold a provisional statement in respect of the premises? Yes  No

If the answer is “yes”, please give the unique reference number for the provisional statement (as set out at the top of the first page of the statement):

**Part 2 – Applicant Details**

If you are an individual, please fill in Section A. If the application is being made on behalf of an organisation (such as a company or partnership), please fill in Section B.

**Section A**

**Individual applicant**

1. Title: Mr  Mrs  Miss  Ms  Dr  Other (please specify)

2. Surname: \_\_\_\_\_ Other name(s): \_\_\_\_\_

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence]*

3. Applicant's address (home or business – *[delete as appropriate]*):

Postcode:

4(a) The number of the applicant's operating licence (as set out in the operating licence):

4(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made:

5. Tick the box if the application is being made by more than one person.

*[Where there are further applicants, the information required in questions 1 to 4 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Section B****Application on behalf of an organisation**

6. Name of applicant business or organisation: **Merkur Slots UK Limited**

*[Use the names given in the applicant's operating licence or, if the applicant does not hold an operating licence, as given in any application for an operating licence.]*

7. The applicant's registered or principal address:

**Seebeck House,  
1A Seebeck Place,  
Knowlhill,  
Milton Keynes**

Postcode: **MK5 8FR**

8(a) The number of the applicant's operating licence (as given in the operating licence):

**003266-N-103444**

8(b) If the applicant does not hold an operating licence but is in the process of applying for one, give the date on which the application was made: **N/A**

9. Tick the box if the application is being made by more than one organisation.

*[Where there are further applicants, the information required in questions 6 to 8 should be included on additional sheets attached to this form, and those sheets should be clearly marked "Details of further applicants".]*

**Part 3 – Premises Details**

10. Proposed trading name to be used at the premises (if known): **Merkur Slots**

11. Address of the premises (or, if none, give a description of the premises and their location):

**67 Deansgate,  
Manchester**

Postcode: **M3 2BW**

12. Telephone number at premises (if known):

13. If the premises are in only a part of a building, please describe the nature of the building (for example, a shopping centre or office block). The description should include the number of floors within the building and the floor(s) on which the premises are located.

**Ground floor high street location.**

14(a) Are the premises situated in more than one licensing authority area?

**Yes/No** *[delete as appropriate]*

14(b). If the answer to question 14(a) is yes, please give the names of all the licensing authorities within whose area the premises are partly located, **other than the licensing authority to which this application is made:**

#### Part 4 – Times of operation

15(a). Do you want the licensing authority to exclude a default condition so that the premises may be used for longer periods than would otherwise be the case? **Yes/No** *[delete as appropriate]* *[Where the relevant kind of premises licence is not subject to any default conditions, the answer to this question will be no.]*

15(b). If the answer to question 15(a) is yes, please complete the table below to indicate the times when you want the premises to be available for use under the premises licence. **N/A**

	<i>Start</i>	<i>Finish</i>	<i>Details of any seasonal variation</i>
Mon			
Tue			
Wed			
Thurs			
Fri			
Sat			
Sun			

16. If you wish to apply for a premises licence with a condition restricting gambling to specific periods in a year, please state the periods below using calendar dates: **N/A**

#### Part 5 – Miscellaneous

17. Proposed commencement date for licence (leave blank if you want the licence to commence as soon as it is issued): *(dd/mm/yyyy)*

18(a). Does the application relate to premises which are part of a track or other sporting venue which already has a premises licence? **Yes / No** *[delete as appropriate]*

18(b). If the answer to question 18(a) is yes, please confirm by ticking the box that an application to vary the main track premises licence has been submitted with this application.

19(a). Do you hold any other premises licences that have been issued by this licensing authority?

**YES** *[delete as appropriate]*

19(b). If the answer to question 19(a) is yes, please provide full details:

Merkur Slots 44-50 Portland Street, Manchester M1 4QU BINGO247236

20. Please set out any other matters which you consider to be relevant to your application:

**The Applicant operates a national estate of licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. Substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.**

**The operator has full authority to provide licensed bingo by the provision of an Operating Licence granted by the Gambling Commission. The UK's Gambling Regulator has therefore approved the measures implemented to ensure that effective anti-money laundering procedures are implemented, and policies have been developed to ensure responsible trading in accordance with the gambling legislation, the licensing objectives and the licence conditions and code of practice.**

**A copy of The applicants Operational Standards has been provided in support of the application and full copies of the Applicant's policies and procedures are available, if required.**

**A copy of The applicants 'Working Together' document has also been supplied in support of the application, which provides an overview of the licensee's proposed operation.**

#### **Part 6 – Declarations and Checklist (Please tick)**

We confirm that, to the best of our knowledge, the information contained in this application is true. We understand that it is an offence under section 342 of the Gambling Act 2005 to give information which is false or misleading in, or in relation to, this application.

We confirm that the applicant(s) have the right to occupy the premises.

Checklist:

- Payment of the appropriate fee has been made/is enclosed
- A plan of the premises is enclosed
- We understand that if the above requirements are not complied with the application may be rejected
- We understand that it is now necessary to advertise the application and give the appropriate notice to the responsible authorities

#### **Part 7 – Signatures**

21. Signature of applicant or applicant's solicitor or other duly authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:



Print Name: [REDACTED]

Date: 15/09/2022

Capacity: [REDACTED]

22. For joint applications, signature of 2nd applicant, or 2nd applicant's solicitor or other authorised agent. If signing on behalf of the applicant, please state in what capacity:

Signature:

Print Name: \_\_\_\_\_

Date: \_\_\_\_\_

Capacity: \_\_\_\_\_

*[Where there are more than two applicants, please use an additional sheet clearly marked "Signature(s) of further applicant(s)". The sheet should include all the information requested in paragraphs 21 and 22.]*

*[Where the application is to be submitted in an electronic form, the signature should be generated electronically and should be a copy of the person's written signature.]*

### Part 8 – Contact Details

23(a) Please give the name of a person who can be contacted about the application:

[REDACTED]

23(b) Please give one or more telephone numbers at which the person identified in question 23(a) can be contacted:

[REDACTED]

24. Postal address for correspondence associated with this application:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

25. If you are happy for correspondence in relation to your application to be sent via e-mail, please give the e-mail address to which you would like correspondence to be sent:

[REDACTED]

I, [REDACTED] refer to the following:-

1. Letter to Council dated 15/09/2022
2. Application Form
3. Notice of Application
4. A copy of Licensing Plan
5. Layout plan for illustrative purposes only
6. Payment made via phone
7. Local Area Risk Assessment
8. Copy of Merkur Slots UK Limited's Operational Standards
9. Copy of Merkur Slots UK Limited's 'Working Together'

I FURTHER CERTIFY that I have served documents 1 - 9 upon the following:-

1. Premises Licensing, Manchester City Council, Level 1, Town Hall Extension, Albert Square, PO Box 532, Manchester, M60 2LA

I FURTHER CERTIFY that I have served a true copy of documents 1 & 3 upon the following:-

2. Greater Manchester Police, City of Manchester Partnership, 1st Floor, Manchester Town Hall Extension, Lloyd Street, Manchester, M2 5DB
3. HM Revenue & Customs, Business, Tax and Customs, HM Revenue and Customs, BX9 1GL
4. Greater Manchester Fire & Rescue Service, Manchester Central Fire Station, Thompson Street, Manchester, M4 5FP
5. The Gambling Commission, 4th Floor, Victoria Square House, Victoria Square, Birmingham, B2 4BP
6. Manchester Safeguarding Children Board, Manchester City Council, Level 4, Town Hall Extension, PO Box 532, Town Hall, Manchester, M60 2LA
7. Manchester Local Planning Authority (Premises Licences), Manchester City Council, Po Box 463, Town Hall, Manchester, M60 3NY
8. Licensing and Out of Hours Team (Gambling Licences), Level 1, Town Hall Extension, Lloyd Street, Manchester, M2 5DB

I effected service by sending the said documents to the licensing department by email and the other authorities by first class post addressed to them 15/09/2022

SIGNED... [REDACTED] .....DATED.....15/09/2022.....

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

# Merkur Slots, 67 Deansgate, Manchester M3 2BW

## Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	67 Deansgate, Manchester M3 2BW
Local Authority:	Manchester City Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-025 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	[REDACTED]
Date of Assessment:	5.08.2022
Review Date:	On opening in conjunction with staff

## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots a former Café Nero coffee shop on Deansgate one of the main throughfare roads in the city centre. Deansgate has a mixture of retail, food and leisure outlets. The premise being located at the end closest to the main shopping areas of the city.
Establishments of note:	Manchester Crown Court, Crown Square, Barcroft St, M3 3EB, Manchester Magistrates' Court, Crown Square, Wood St, M60 1PR
Adjoining premises:	Rush Hairdressers, former BarBurritto (currently unoccupied)
Crime statistics:	In the year ending December 2021, the crime rate in Manchester was higher than the average crime rate across similar areas such as Blackpool Liverpool Birmingham. (police.uk). Crime data for greater Manchester is missing since July 2019 due to an IT systems error so only historical data over 3 years old is available. (Streetcheck.co.uk)
Population:	86.2% of households are in Higher and intermediate managerial, administrative, or professional positions and Supervisory, clerical, and junior managerial/administrative/professional positions. Across the UK as a whole, the gender split is roughly equal at 49% male, 51% female. This address in Manchester Central constituency is broadly in line with those figures, with 54% male. There is a wide variety of age groups in the area the main groups in the bracket 25-44 with 81.3% being single. (streetcheck.co.uk)
Culture:	As whole, the UK population claims itself as approximately 86% white, with this area being 80% white. 6.6% of the population are of mixed ethnicity and 5.6% are Chinese. In this area (Deansgate, Manchester), 67% of the residents were born in England, which is significantly below the English average. (streetcheck.co.uk)
Unemployment:	In the year 2021 75.9% of the area's population were economically active compared to 78.4% in GB. 69.1% of the economically active were employed. Unemployment was 6.6% compared to 4.6% in the northwest and 4.4% in GB. Of those economically inactive 29.7% were students, 20.9% long term sick and 5% retired. (nomis)
Deprivation:	According to the 2019 Index of Multiple Deprivation (IMD), Manchester ranks 6 out of 326 local authorities in England, where 1 is the most deprived. 43% of Manchester's LSOAs are in the most deprived 10% in England on the IMD. Within Manchester itself Deansgate is ranked at 29 out of 32 with 24.1% of the areas population deprived, Miles Platting and Newton Heath have the highest % - 62.7. (IMD 2019)
Local Police:	Greater Manchester Police City Centre, Town Hall, Lloyd St, M60 2LA

**The Gambling Act 2005 sets out the three licensing objectives (LO), which are:**

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- Ensuring that gambling is conducted in a fair and open way.
- Protecting children and other vulnerable people from being harmed or exploited by gambling.

**Localised Risks to the Licensing Objectives**

This Local Area Risk assessment takes into consideration Manchester City Council local authority Statement of Gambling Principles and Manchester City Council Intelligence Hub.

**Environmental Factors**

In preparing this assessment Merkur Slots has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
<p>Protecting children and other vulnerable people from being harmed or exploited by gambling</p>	<p><b>Unemployment:</b> In the year 2021 75.9% of the areas population were economically active compared to 78.4% in GB. 69.1% of the economically active were employed. Unemployment was 6.6% compared to 4.6% in the north west and 4.4% in GB. Of those economically inactive 29.7% were students, 20.9% long term sick and 5% retired. (nomis)</p> <p><b>Deprivation:</b> According to the 2019 Index of Multiple Deprivation (IMD), Manchester ranks 6 out of 326 local authorities in England, where 1 is the most deprived. 43% of Manchester's LSOAs are in the most deprived 10% in England on the IMD. Within Manchester itself Deansgate is ranked at 29 out of 32 with 24.1% of the areas population deprived, Miles Platting and Newton Heath have the highest % - 62.7. (IMD 2019)</p> <p><b>Schools and Education</b> The University of Law, 2 New York St, M1 4HJ Sola Fide Trust, Church House, 90 Deansgate, M3 2GH The School of Journalism, 16-18 Albert Square, M2 5PE Abbey College, 5-7 Cheapside, M2 4WG Chetham's School of Music, Long Millgate, M3 1SB MC Academy, Royal Buildings, 2 Mosley St, M2 3AN International British Theatre School, 61 Mosley St, M2 3HZ Britannia English School, 12 Charlotte St, M1 4FL</p>	<p><b>Age Verification</b> <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Manchester Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

The Manchester College, St Johns Centre, Quay St, M3 3BE  
 Manchester Central College, 1 Harter St, M1 6HY  
 The University of Manchester, Oxford Rd, M13 9PL  
 Manchester Metropolitan University, All Saints Building, M15 6BH  
 Screen and Film School Manchester, Unit 6 & 8, Left Bank, New Quay St, M3 3AN

#### **Community Centres and Youth Centres**

Chabad In The City, 36 John Dalton St, M2 6LE  
 Young Manchester, Centurion House, 129 Deansgate, M3 3WR  
 YMCA, Liverpool Rd, M3 4JR  
 UK Care and Secure Transport Services, 91 Princess St, M1 4HT

#### **Parks, play grounds and sports/leisure facilities**

Saint John's Gardens, Lower Byrom St, M3 4AP  
 Roman Gardens, Duke St, M3 4JL  
 Castlefield Urban Heritage Park, Duke St, M3  
 Bannatyne Health Club and Spa, Sunlight House, Quay St, M3 3JZ  
 Livingwell Health Club, 303 Deansgate, M3 4LQ  
 The Y Club, Liverpool Rd, M3 4JR  
 Parsonage Gardens, St Mary's Parsonage, M3 2LF

#### **Vulnerable and addiction support services**

The Diocese of Manchester, Church House, 90 Deansgate, M3 2GH  
 Mothers' Union Manchester, 3, Church House, 90 Deansgate, M3 2GH  
 Adult and Young People's Drug and Alcohol Service, Zion Community Centre, 339 Stretford Rd, Hulme, M15 4ZY  
 Back on Track, 20 Swan St, M4 5JW

#### **Homeless shelters and food banks**

Shelter, 5 Samuel Ogden St, Greater, M1 7AX  
 Street Support Network, M1 2HY  
 Coffee4Craig Street Kitchen, 42-46 Victoria St, M3 1ST  
 Centrepoint, 52 Oldham St, M4 1LE  
 Embassy Village, Egerton St, M15 4NU  
 Barnabus, 45 Bloom St, M1 3LY  
 Lifeshare Ltd, First floor, 27 Houldsworth St, M1 1EB  
 Depaul UK The St Peter's House, Oxford Rd, M13 9GH  
 The Men's Room, Raven House, 113 Fairfield St, M12 6EL  
 Manchester South Central Foodbank, St Edmund's Church, Alexandra Road South, M16 8EZ and Unit 3, Wesley Centre, Royce Road Corner of, Old York St, Hulme, M15 5BP  
 Manchester Central Foodbank, Oxford Rd, M13 9PG

#### **Medical Centres, Care Homes and Mental Health facilities**

City Health Walk In Centre, 14 Cross St, M2 7AE  
 The Medical Centre, 17 St John St, M3 4DR  
 The Doctors Clinic, Ground Floor, London Doctors Clinic, Optimised Personal Wellness, Lower, 64 Bridge St, M3 3BN  
 City Health Walk In Centre, 32 Market St, M1 1PL

Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies – Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.

Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.

All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

Results of age verification checks and third-party results are shared with the Gambling Commission.

Proof of Age scheme in place with application forms available in the venue.

The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.

We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' <https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019>

#### **Vulnerability**

Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).



<p>           Doctorcall Regents Park Clinic, 4 Exchange St, M2 7HA            Samedaydoctor, Fabric Building 30 Queen Street, M2 5HX            City Centre Therapy, 82 King St, M2 4WQ            D R Downes, 244 Deansgate, M3 4BQ            The BDD Therapy Clinic, 5th Acresfield St Ann's Square M2 7HA            Meridian, Milton Hall, 244 Deansgate, M3 4BQ            Pall Mall Medical, 61 King St, M2 4PD            Tegg children hospital, 11 Kennedy St, M2 4AT            Bupa Health Centre, 4 Marble St, Spring Gardens, M2 1FB            Hospitals, 43A Brown St, M2 2JJ         </p> <p> <b>Pawnbrokers and Loan Shops</b>            Prestige Pawnbrokers, 243 Deansgate, M3 4EN            Ramsdens, 1 King St, M2 6AW            Mays Pawnbrokers &amp; Jewellers, 3 Exchange St, M2 7EA            Manchester Credit Union, Queens Court, 24 Queen St, M2 5HX         </p> <p> <b>Gambling premises</b>            Manchester235, 2 Watson St, M3 4LP            Genting Casino, 110 Portland St, M1 4RL            Grosvenor Casino, 35/39 George St, M1 4HQ            Casino Circle, Steam Packet House, 72-76 Cross St, M2 4JG            Bongos Bingo, Albert Hall, 27 Peter St, M2 5QR            Napoleons Casino, 57 Portland St, M1 3HP            Nobles Amusements, M1 4AJ            The Printworks, 27 Withy Grove, M4 2BS            Admiral Casino, Wellington House, 39 Piccadilly, M1 1LQ            Pound Bingo, The Copper Room, Deva Centre, M3 7BG            Bingo Balls, Unit 21-22, The Printworks, M4 2BS            William Hill, 47 Deansgate, M3 2AY            Betfred, 38 King St W, M3 2WZ            Betfred, 133 Deansgate, M3 3WR            Ladbrokes, 15 Cross St, M2 1WE            William Hill, 40, 42 Oxford St, M1 5EJ            William Hill, 30 High St, M4 1QB            Betfred, 8 High St, M4 1QB            Betfred, 10 Mosley St, M2 3AQ            Paddy Power, F2, City Tower, 44 Parker St, M1 4BD            Betfred, 14 Nicholas St, M1 4EJ            William Hill, 40, 42 Oxford St, M1 5EJ         </p> <p> <b>Public Houses and Alcohol Licensed Premise</b>            The Botanist, 78 Deansgate, M3 2FW            The Moon Under Water, 68-74 Deansgate, M3 2FN            Slug &amp; Lettuce, 64-66 Deansgate, M3 2EN            Roxy Ball Room, 76-78 Deansgate, M3 2FN            Be At One, 80 Deansgate, M3 2ER            Point Blank, Basement, 78, Deansgate, M3 2FW            The Liquor Store, Maybrook House, 40 Blackfriars St, M3 2EG            Arcane, 2 S King St, M2 6DQ            The Sawyer'S Arms, 138 Deansgate, M3 2RP         </p>	<p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Merkur Slots, Manchester will support the promotion of the NHS Northern Gambling Service within the premises and guide any vulnerable people or those at risk of harm from gambling towards this support service.</p> <p>Merkur Slots will incorporate reference to the NHS Northern Gambling Service in its employee Safeguarding Vulnerable People from Gambling Harm training modules.</p> <p><b>Customer interaction</b> Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p><b>Player Protection</b> <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p>
---	--

	<p>The Lost Dene, 144 Deansgate, M3 3EE  The Bridge Tavern, 58 Bridge St, M3 3BW  BOX, 125 Deansgate, M3 2BY  Panacea, 14 John Dalton St, M2 6JR  Black Sheep, 2-4 St Ann St, M3 2BW  Revolution, Arkwright House, Parsonage Gdns, M3 2LF  Dirty Martini, 1 Peter St, M2 5QR  Bar Hütte, 235 Deansgate, M3 4EN  Yours Restaurant &amp; Bar, 82 Deansgate, M3 2ER  Las Iguanas, 84 Deansgate, M3 2ER  Rosa's, The Old Courthouse, 184 Deansgate, M3 3WB  Motley, 115 Deansgate, M3 2NW  Tast Catala, 20-22 King St, M2 6AG  Gaucho, 2A St Mary's St, M3 2LB  Bem Brasil, King St W, M3 2GQ  La Viña, 105/107 Deansgate, M3 2BQ  San Carlo, 42 King St W, M3 2WY  Australasia, 1 The Avenue, Deansgate, M3 3AP  Hawksmoor, 184, 186 Deansgate, M3 3WB  Topkapi Palace, 205 Deansgate, M3 3NW  El Rincon de Rafa, 244 Deansgate, M3 4BQ  Siam Smiles, 253, Deansgate, M3 4EN  Cibo, Unit 4, Great Northern Warehouse, M3 4EN  Hilton, 303 Deansgate, M3 4LQ  Club Liv, 111A Deansgate, M3 2BQ  Tesco Express, Maybrook House, 50-52 Deansgate, M3 2FE  Sainsbury's, 130-136 Deansgate, M3 2GQ  SPAR, 8 St Mary's Gate, M1 1PX</p> <p><b>Residential Areas</b>  Deansgate is a predominantly nonresidential road in the city centre. The surrounding areas have several new residential areas, mainly apartment blocks privately owned or rented.</p> <p><b>Bus stops and other Transport links</b>  Free City centre buses run along Deansgate in addition to regular Bus services across the city and surrounding areas.  Tram Stops at Castlefield, Exchange Square, St peters Square  Deansgate Train Station, M3 4LG</p> <p><b>Locally Identified Premises</b>  Everyman St. John's, ABC Buildings, 23 Quay St, M3 4AS (cinema)  Science and Industry Museum, Liverpool Rd, M3 4FP  Castlefield Visitors Centre, M3 4JR  Castlefield Bowl, Rice St, M3 4JR  Manchester Central Convention Complex, Windmill St, M2 3GX  John Rylands Research Institute &amp; Library, 150 Deansgate, M3 3EH  National Football Museum, Todd St, M4 3BG  Manchester Central Library, St Peter's Square, M2 5PD  The Portico Library, 57 Mosley St, M2 3HY  Manchester City Council, Town Hall, Albert Square, M2 5DB</p>	<p>Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.</p> <p>'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.</p> <p>Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.  Socially Responsible messaging is implemented on all digital B3 and Cat C machines.</p> <p>All machines display Gamble Responsibly stickers with helpline contact details.</p> <p>Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.</p> <p>The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.</p> <p><b>Deprivation</b>  Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm</p> <p>Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.</p> <p><b>Homelessness</b>  Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.</p> <p>Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Staff are trained how to manage situations with homeless people seeking refuge.</p> <p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
--	---	--

	<p>Royal Exchange Theatre, St Ann's Square, M2 7DH</p> <p><b>Regular Festivals, Town Events and Mass Gatherings</b>          Many festivals and events are held in and around the City Centre throughout the year – including Pride, Christmas Markets, concerts at The Ethiad and Old Trafford, large sporting events. Music events and concerts at Castlefields and The Arena.</p>	
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b>          In the year ending December 2021, the crime rate in Manchester was higher than the average crime rate across similar areas such as Blackpool Liverpool Birmingham. (police.uk). Crime data for greater Manchester is missing since July 2019 due to an IT systems error so only historical data over 3 years old is available. (Streetcheck.co.uk)</p> <p><b>Local Police:</b>          Greater Manchester Police City Centre, Town Hall, Lloyd St, M60 2LA</p> <p><b>Public Houses and Alcohol Licensed Premise</b>          The Botanist, 78 Deansgate, M3 2FW          The Moon Under Water, 68-74 Deansgate, M3 2FN          Slug &amp; Lettuce, 64-66 Deansgate, M3 2EN          Roxy Ball Room, 76-78 Deansgate, M3 2FN          Be At One, 80 Deansgate, M3 2ER          Point Blank, Basement, 78, Deansgate, M3 2FW          The Liquor Store, Maybrook House, 40 Blackfriars St, M3 2EG          Arcane, 2 S King St, M2 6DQ          The Sawyer'S Arms, 138 Deansgate, M3 2RP          The Lost Dene, 144 Deansgate, M3 3EE          The Bridge Tavern, 58 Bridge St, M3 3BW          BOX, 125 Deansgate, M3 2BY          Panacea, 14 John Dalton St, M2 6JR          Black Sheep, 2-4 St Ann St, M3 2BW          Revolution, Arkwright House, Parsonage Gdns, M3 2LF          Dirty Martini, 1 Peter St, M2 5QR          Bar Hütte, 235 Deansgate, M3 4EN          Yours Restaurant &amp; Bar, 82 Deansgate, M3 2ER          Las Iguanas, 84 Deansgate, M3 2ER          Rosa's, The Old Courthouse, 184 Deansgate, M3 3WB          Motley, 115 Deansgate, M3 2NW          Tast Catala, 20-22 King St, M2 6AG          Gaucho, 2A St Mary's St, M3 2LB          Bem Brasil, King St W, M3 2GQ          La Viña, 105/107 Deansgate, M3 2BQ          San Carlo, 42 King St W, M3 2WY          Australasia, 1 The Avenue, Deansgate, M3 3AP</p>	<p><b>Premise Security and violence in the workplace</b>  <i>Poor security control measures which may increase vulnerability to crime</i>  <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Manchester is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Manchester will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>General Crime and Disorder</b>  <i>To identify aggressive customers to prevent crime and disorder</i>  <i>Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p>

Hawksmoor, 184, 186 Deansgate, M3 3WB  
 Topkapi Palace, 205 Deansgate, M3 3NW  
 El Rincon de Rafa, 244 Deansgate, M3 4BQ  
 Siam Smiles, 253, Deansgate, M3 4EN  
 Cibo, Unit 4, Great Northern Warehouse, M3 4EN  
 Hilton, 303 Deansgate, M3 4LQ  
 Club Liv, 111A Deansgate, M3 2BQ  
 Tesco Express, Maybrook House, 50-52 Deansgate, M3 2FE  
 Sainsbury's, 130-136 Deansgate, M3 2GQ  
 SPAR, 8 St Mary's Gate, M1 1PX

**Pawnbrokers and Loan Shops**  
 Prestige Pawnbrokers, 243 Deansgate, M3 4EN  
 Ramsdens, 1 King St, M2 6AW  
 Mays Pawnbrokers & Jewellers, 3 Exchange St, M2 7EA  
 Manchester Credit Union, Queens Court, 24 Queen St, M2 5HX

**Gambling premises**  
 Manchester235, 2 Watson St, M3 4LP  
 Genting Casino, 110 Portland St, M1 4RL  
 Grosvenor Casino, 35/39 George St, M1 4HQ  
 Casino Circle, Steam Packet House, 72-76 Cross St, M2 4JG  
 Bongos Bingo, Albert Hall, 27 Peter St, M2 5QR  
 Napoleons Casino, 57 Portland St, M1 3HP  
 Nobles Amusements, M1 4AJ  
 The Printworks, 27 Withy Grove, M4 2BS  
 Admiral Casino, Wellington House, 39 Piccadilly, M1 1LQ  
 Pound Bingo, The Copper Room, Deva Centre, M3 7BG  
 Bingo Balls, Unit 21-22, The Printworks, M4 2BS  
 William Hill, 47 Deansgate, M3 2AY  
 Betfred, 38 King St W, M3 2WZ  
 Betfred, 133 Deansgate, M3 3WR  
 Ladbrokes, 15 Cross St, M2 1WE  
 William Hill, 40, 42 Oxford St, M1 5EJ  
 William Hill, 30 High St, M4 1QB  
 Betfred, 8 High St, M4 1QB  
 Betfred, 10 Mosley St, M2 3AQ  
 Paddy Power, F2, City Tower, 44 Parker St, M1 4BD  
 Betfred, 14 Nicholas St, M1 4EJ  
 William Hill, 40, 42 Oxford St, M1 5EJ

**Residential Areas (impacted by Anti Social Behaviour)**  
 Some low level crime and anti-social behaviour takes place in the car park, on the street, and under the railway bridges close to Deansgate Station, but it is a generally quiet area unlike outside Deansgate Locks.

The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).

Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.

Merkur Slots Manchester will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.

#### **Anti-social behaviour outside the premise**

Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.

Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.

Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.

Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

#### **Money Laundering**

*Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.*

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

There are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Manchester will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarms will be installed.

		<p>Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.</p> <p><b>Alcohol and Drugs</b>          Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.          'No Alcohol Allowed' signage on the door.</p> <p>Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.</p> <p>Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.</p> <p>Maglock systems will be deployed during times of public houses closing.</p> <p><b>Money Lending</b>          Money lending is not tolerated within our premises.</p> <p>Suspicious of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.</p>
<p>Ensuring that gambling is conducted in a fair and open way</p>		<p><b>Bingo/Gaming Machine and Supervision</b>          The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of G-Tab tablets offering a range of Bingo products and Live calling. G Tabs are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b>  <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p>

		<p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaints portal used to collate and manage responses. 4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b> Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
Other	<p><b>Places of worship and Religious Buildings</b> St Mary's RC Church, 17 Mulberry St, M2 6LN Saint Ann's Church, St Ann St, M2 7LF Church of Trisha Paytas, 13 Peter St, M2 5QR Audacious Church, Trinity Way, M3 7BD City Church Manchester, Central Building, Oldham St, M1 1JQ Methodist Church, Central Buildings, Oldham St, M1 1JQ Anglican Diocese of Manchester, 51 W Mosley St, M2 3HQ Cross Street Chapel, Cross St, M2 1NL Fourth Church Of Christ Scientist, 42 Peter St, M2 5GP The Covenant Nation, 235 Deansgate, Manchester M3 4EN Church Of Scientology, 258 Deansgate, M3 4BG Manchester Cathedral, Victoria St, M3 1SX The Spirit of Life, 90 Deansgate, M3 2GH</p>	<p><b>Ethnicity and Local Area Demographic</b> Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b></p>

		<p>Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bi monthly and Compliance Auditors twice yearly.</p> <p><b>COVID 19</b> All staff receive training on COVID-19 guidelines.</p> <p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
--	--	---



Merkur Slots Manchester Premise Layout

Premise level:	Merkur Slots Manchester is a ground floor premises with ancillary floors above.
Premise frontage:	Merkur Slots Manchester will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<p>Merkur Slots Manchester floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> <li>- TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
Floor layout:	Merkur Slots Manchester floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Manchester will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of Tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Manchester will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Page 39

**Additional Comments**

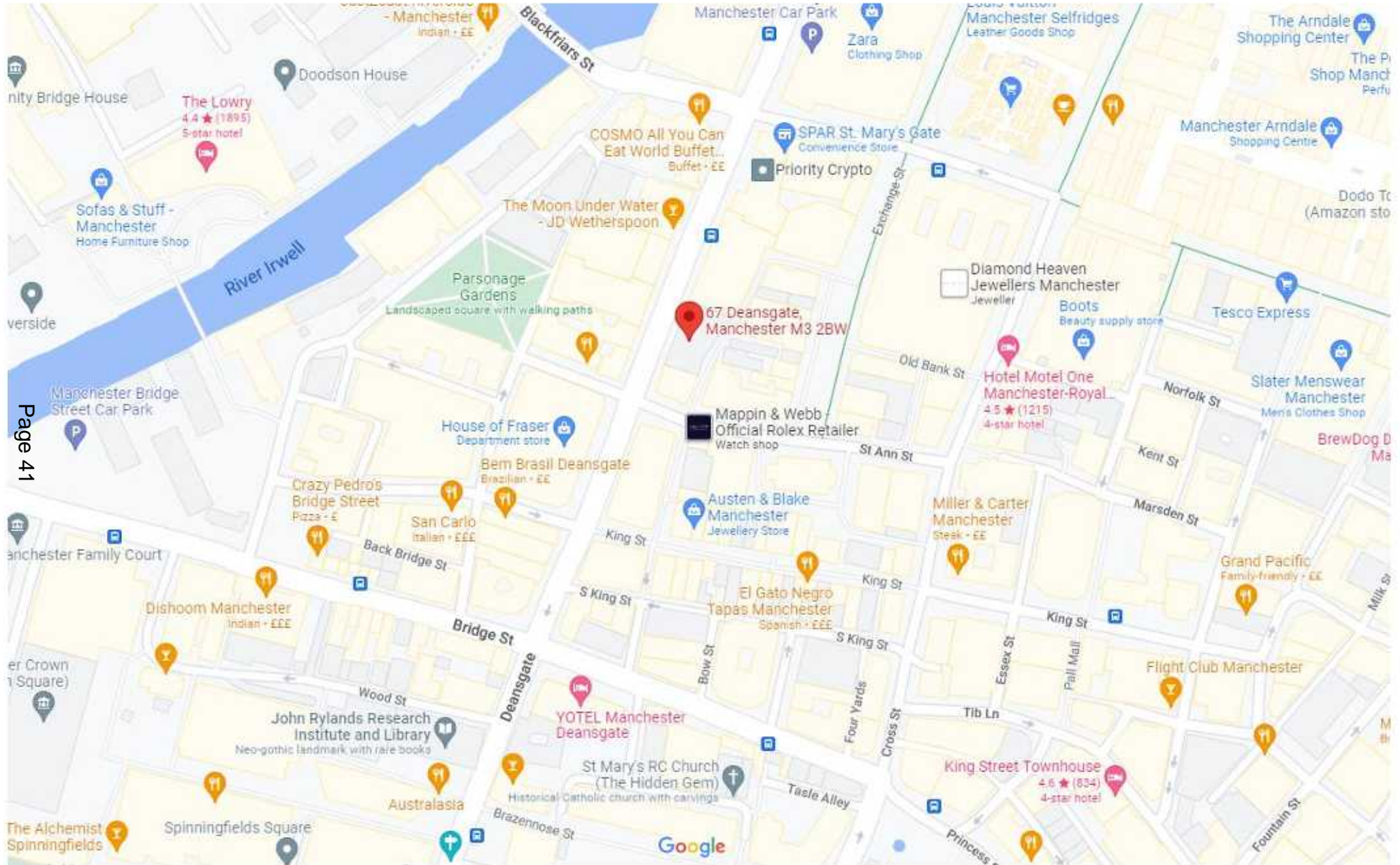
I have worked in the Gaming Industry for 27 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. Local Merkur venues and L&D department will ensure the team in any new locations are fully trained and supported before the opening and during its first trading months. When I was asked to produce the Local Area Risk Assessment to accompany the License Application for Merkur Slots Manchester, I researched the area, used my knowledge of the area as I had been the Area Manager for the Cashino in Eccles and also am familiar with Merkur venues in Farnworth and Bolton. I then visited the area on 5.8.22 before completing my report. The area around the premise was busy with shoppers, tourists and people relaxing in the bars and restaurants.

This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual" to be found in the premise and in our Player Protection Framework. The company also carries out premise's security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore, identification of issues relating to gambling related harm are based on individual customer behaviour even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	
Signature:	
Date:	5.08.2022

# Merkur Slots, 67 Deansgate, Manchester M3 2BW



Merkur Slots, 67 Deansgate, Manchester M3 2BW – Shop frontage example



Page 42

Appendix 4, Item 4

## THE LICENSING OBJECTIVES UNDER THE GAMBLING ACT 2005

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

**Objective 1** - Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.

- Merkur Slots UK Limited is aware that it must notify the Gambling Commission should we suspect that offences under the Gambling Act 2005 are being committed.
- Merkur Slots UK Limited complies with the Commission's advice on the Proceeds of Crime Act 2002.
- Merkur Slots UK Limited has completed its own Business Anti-money laundering risk assessment, local area risk assessments and implements anti-money laundering policies and procedures.
- If we suspect anyone of using our premises for the furtherance of criminal activity (for instance drug dealing, using counterfeit money, selling suspected stolen property and criminal damage) we will contact the police immediately, report to our Head of Compliance and record the instance in the AML and Incidents modules of the electronic Smart Tablet system.
- All Merkur Slots UK Limited premises operate digital CCTV and customer areas are supervised.
- Merkur Slots operates a group-wide Security Alert system where incidents are shared instantly with all licenced premises. We have an internal Fraud Measures Team that respond to and investigate incidents. As a BACTA member, we receive nationwide Security Alerts, which are circulated via the Security Alert system to all licenced premises.
- All Merkur Slots premises provide a static alarm system which is also supported by Staff Guard, a nationwide security company that offers 24hr support via a monitoring centre with fully trained operatives who advise on difficult situations and escalate appropriately.
- Merkur Slots UK Limited has an extensive security, audit and money laundering team monitoring employees and customer activity.
- All Merkur Slots employees complete six-monthly refresher training which covers this licencing objective; anti-money laundering policies and procedures; and guidance on the Proceeds of Crime Act 2002.
- Merkur Slots operate a robust late night working policy, which is fully supported by a full-time Night Manager.

- Merkur Slots does not operate a single-manning policy between 8pm and close, however, should an emergency occur a 'locked door' and 'keep in touch' policy is implemented.

**Objective 2** - Ensuring that gambling is conducted in a fair and open way.

- Our gaming rules are prominently displayed in each of our licensed premises.
- Our employees have a full understanding of machine gaming rules.
- We encourage customer-facing employees to use positive discretion to resolve customer issues at a local level, where possible.
- Our Customer Complaints procedure is displayed prominently in every venue. Where customer disputes cannot be resolved satisfactorily, we refer all potential disputes to our appointed Alternate Dispute Resolution provider (IBAS).
- All venue managers attend our National Training Centre for a thorough induction programme prior to taking on responsibility of their own venue and team.
- All licensed premises employees receive induction and six-monthly refresher training during the course of their employment to ensure that potential issues can be addressed at the earliest opportunity.

**Objective 3** - Protecting children and other vulnerable persons from being harmed or exploited by gambling

- All our licensed premises are strictly adult only and we provide appropriate notification on entry, on all marketing material and throughout our premises.
- We operate a Think 25 policy as standard and all employees are trained to request a photographic form of identity if they suspect that a customer is under age. All challenges are recorded on our Smart Tablet system under Age Verification Checks and Check Policy are our third-party independent partner for compliance testing.
- All licensed premise employees receive induction and six-monthly refresher training during the course of their employment on social responsibility and safeguarding children and vulnerable people, with a particular focus on the prevention of harm.
- We prominently display information throughout our licensed premises on responsible gambling and provide details of organisations that can provide support and guidance such as BeGambleAware.
- Playright is installed in all licensed premises - this is a self-help App available to customers to enable them to manage spend and play time.
- Socially Responsible messaging is implemented on B3 and Category C digital machines.
- All licensed premise employees are trained to identify potential at risk customers and conduct effective interactions. Customer interactions are recorded on the Interactions module on the electronic Smart Tablet and reviewed centrally by the Compliance team.
- We implement a self-exclusion policy throughout our licensed premises and operate a Smart Tablet system for recording self-exclusions, reinstatements and breaches. We are also members of the Bingo Association Multi-Operator Self-exclusion Scheme.



# OPERATIONAL STANDARDS

- The layout of our premises is designed to facilitate customer supervision by employees.
- We provide an annual donation in support of research, education and treatment of problem gambling.

All three licensing objectives are embedded at all levels within the organisation via training both on-line and face to face, during Operational meetings, Business Bulletin communications, Compliance/Audit visits and annual conferences.

# WORKING TOGETHER



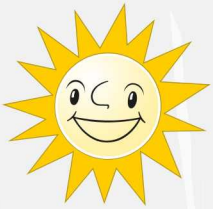
Accredited by the Global Gambling Guidance Group

**THE MERKUR FAMILY**



# PART OF THE GAUSELMANN GROUP

## A Strong Partner For More Than 60 Years



**MERKUR  
CASINO**

Merkur Casino UK, formerly Praesepe, is a subsidiary of the family run Gauselmann Group who are based in Espelkamp (Germany). Over the last 60 years the group has grown to operate more than 700 venues across Europe under the Merkur Brand. Millions of enthusiastic guests at home and abroad know our logo. The laughing MERKUR Sun is a guarantor for the best entertainment.

Merkur Casino UK employs over 1,600 people (61% Female) over 3 Bingo Clubs, over 180 High Street gaming centres and 3 Family Entertainment Centres under two main brands.



**61% of employees are female**  
**39% of employees are male**

Merkur Slots is the main UK brand. All Merkur Casino and Casino Gaming venues will be rebranded into this new name over time. Our venues represent the very best in terms of exciting 'slot gaming' entertainment through delivering to our customers the latest in venue product and atmosphere. These venues are known for their highly trained teams and first class face to face service.

Merkur Bingo clubs, formerly Beacon Bingo, are very important to our customers in their local communities. Our teams strive to deliver not just great service but a Bingo experience which focusses on ambience, safety and fun in a modern environment. The flagship venue at Cricklewood, in North London, is the largest in Europe.



**MERKUR  
SLOTS**



**MERKUR  
BINGO**

# HIGH STREET BINGO



## What is it?

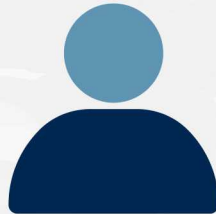
Bingo is one of the UK's favourite pastimes and Praesepe is one of the UK's largest operators of licensed bingo and arcade premises. Our High Street Bingo Venues:



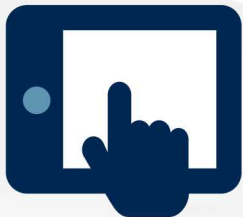
Offer more local, convenient locations to play Bingo rather than travelling to larger clubs.



Our teams remain with the customers on the venue floor rather than behind a counter.



Our customers can attend and play bingo at any time with the numbers auto-called.



The market on the high street has evolved with venues now providing Electronic Bingo Tablets.

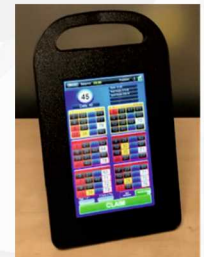


Bingo is available for play from 9am until midnight.

Our Bingo terminals offer B3, Cat C and Cat D products with an average stake of between 30-40p stake.



## Bingo Terminals





# RESPONSIBILITY IS THE FOUNDATION OF OUR BUSINESS

## Think 25 Messaging



## Players in Venue



## We Are Not A Problem

Being a responsible operator is high priority across the Gauselmann group and in the UK, Merkur Casino is always looking at ways to adhere to the three licensing objectives as technology and customer behaviour changes.

### GAMBLING COMMISSION

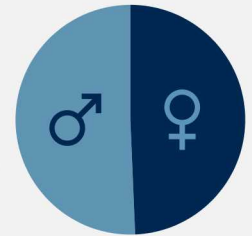
Merkur Casino is regulated by the Gambling Commission and Licensing Authorities



We do not sell or serve alcohol in our venues. We provide complimentary refreshments, teas and coffees, to customers. Our staff will not allow anyone into the premises who appears to be intoxicated.



We are immensely proud of the fact that we have never had a licence revoked or even reviewed. Incidents are extremely rare. We simply do not generate noise and anti-social behaviour.



Our venues operate a Think 25 policy whereby any persons who look under 25 have to produce a form of photo ID.



Our venues appeal to all ages with our membership gender database split of 52 % Male / 48% Female



Our venues have 3 external age tests per year with a compliance rate of over 94% for the last 3 years, compared to other leisure and gambling sectors that sit around 80%.

# SOCIAL RESPONSIBILITY MEASURES IN PLACE



## In Venue

Operationally we have a number of measures in place to protect our customers. Throughout the business Merkur Casino also has a number of socially responsible gambling tools, and management and training initiatives that include:



All staff complete on-boarding and six-monthly refresher training on "The Essentials of Compliance and Social Responsibility" and "Safeguarding Children and Vulnerable People".



Dedicated Learning & Development Team and National training centres.

IHL SMART tablet in every venue for the recording of customer interactions, self-exclusions, incidents and alerts.



All data is centrally reviewed and evaluated by an independent Audit/Compliance team.



Six monthly compliance audits to help identify training needs in venue.

Local Area Risk Assessments are updated annually to identify any changes in the local area.



PlayRight app installed in all venues that is a self-help tool for customers to manage their gambling.

## Compliance



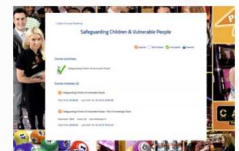
## Training Centre



## PlayRight App



## Online Training



# SOCIAL RESPONSIBILITY MEASURES IN PLACE



## Machine Messaging



## Customer Interaction Training



## All Levels

We provide an annual assurance statement to the Gambling Commission. This officially details the Board's commitment to the company values, purpose and culture and the accountability placed on delivery of the licensing objectives.



The statement contains information on how we operate effective governance, regulatory risk management, compliance controls, social responsibility and safer gambling initiatives.



It is also an opportunity to set out any initiatives relating to significant changes being introduced to improve control systems, risk-management, governance and safer gambling. Our recent commitments include: Socially Responsible Machine Messaging; Customer Set Your Limits; SMART Alert application to report criminal activity; opening our Second National Training Centre; Think 25 messaging and Customer Interaction Training.



Merkur Casino UK received the international certificate of accreditation from the Global Gambling Guidance Group (G4). Our Merkur 360 programme showcases how we are continually improving our social responsibility commitments throughout all levels of the business.

Merkur Casino UK also engages with the Bingo Association, Bacta and Gambling Business Group bodies.



- Senior Manager representation Divisional meetings.
- Operations Director is the Chair for division 3 representing Adult Gaming Centres.
- Member of the National Council.
- Head of Compliance is Vice Chair of the Social Responsibility Committee.
- Operations Director and Head of Compliance are Directors.
- Head of Compliance is a member of the Social Responsibility Committee.

# BENEFITS TO THE HIGH STREET

Appendix A



## Benefits for your High Street include:



Over 90% of new Merkur Slots venues occupy former vacant units.



Investment from £100,000 to £250,000 in long-standing vacant venues.



Linked trips with other shops helping to support other businesses.



Local jobs for between 6 and 12 people depending on the hours of operation.



Increased footfall to the High Street.



We provide an important natural surveillance on the high street, particularly late into the evenings.

# COMMUNITY & CHARITY

## Merkur Initiative

Supporting Local Charities and Good Causes

Amongst other charities, some of your donations have helped:



Merkur Casino UK has raised in excess of  
£1.2 million for good causes since 2005

### Please contact us

For press enquiries:

email [martha@sourcemc.co.uk](mailto:martha@sourcemc.co.uk)

phone +44 (0) 7796 614137

Merkur Casino UK

Seebeck House

1A Seebeck Place

Knowlhill

Milton Keynes

MK5 8FR

phone 01908 351200

email [info@merkur-casino.com](mailto:info@merkur-casino.com)



This page is intentionally left blank



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

Merkur Slots  
 67 Deansgate, Manchester, M3 2BW  
 Premises Licensing  
 Manchester City Council

© Crown copyright and database rights 2018.  
 Ordnance Survey 100019568.



<b>PREMISE NAME:</b>	Merkur Slots
<b>PREMISE ADDRESS:</b>	67 Deansgate, Manchester, M3 2BW
<b>WARD:</b>	Deansgate
<b>HEARING DATE:</b>	30/01/2023

This page is intentionally left blank

**From:** Fraser Swift <fraser.swift@manchester.gov.uk>

**Sent:** 13 October 2022 17:01

**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>

**Subject:** Premises Licence - New, Bingo: 7PA280378/HH, Merkur Slots, 67 Deansgate, Manchester, M3 2BW (Deansgate)

I am submitting this representation in my capacity as the Licensing Authority Responsible Authority.

A local Licensing Authority is required to carry out its function – including considering applications for Premises Licences – to have regard to any code of practice under Section 24 and any guidance document under section 25 issued by the Gambling Commission (GLA), including the provisions of that code and the principles contained in that guidance.

In exercising its functions under the Act, s.153 states that the licensing authority shall aim to permit the use of premises for gambling in so far as it thinks it:

- a. in accordance with any relevant code of practice under s.24
- b. in accordance with any relevant guidance issued by the Commission under s.25
- c. reasonably consistent with the licensing objectives (subject to a and b above)
- d. in accordance with the licensing authority's statement of licensing policy (policy statement) (subject to a to c above).

Currently, I do not believe granting the licence would be consistent with these.

Re (b) above, the Commission has the power to issue two types of code of practice. The first is a social responsibility (SR) code.

Social Responsibility Code 9.1.2 - Bingo

1. Gaming machines may be made available for use in licensed bingo premises **only where there are also substantive facilities for non-remote bingo**, provided in reliance on this licence, available in the premises.
2. Facilities for gambling must only be offered **in a manner which provides for appropriate supervision of those facilities by staff at all times.**
3. Licensees must ensure that **the function along with the internal and/or external presentation of the premises are such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities.**

(emphasis added)

Having had regard to the information submitted in the application, I have concerns that granting this licence would not be "in accordance with" this code:

### ***Substantive facilities for non-remote bingo***

The proposal does not appear to provide substantive facilities for non-remote bingo. The premises appears from the indicative layout to be substantially gaming machines.

### ***Gaming machines***

s172(7), as amended, of the Gambling Act 2005 provides that the holder of a bingo premises licence may make available for use a number of category B gaming machines not exceeding 20% of the total number of gaming machines on the premises, and no restriction on the number of category C or D machines. Regulations state that category B machines at bingo premises are restricted to sub-category B3 (SI 2007/2158: Categories of Gaming Machine Regulations 2007 ) (but not B3A) and B4 machines.

Category 'B' gaming machines can be categorised as 'harder' forms of gambling due to the combination of higher staking and event frequency. This is why they are confined to venues for which consumers attend for the purpose of gambling or for whom the prospect of such gambling facilities being available can reasonably be expected.

Therefore, it is essential to know the degree of gaming machine provision, as this has a direct correlation with the number of 'harder' gaming machines that can be provided in this premises, which in turn, has an impact on the risks posed to the licensing objectives.

I have concerns that presentation of the premises are not such that a customer can reasonably be expected to recognise that it is a premises licensed for the purposes of providing bingo facilities. The venue is laid out with gaming machines throughout its footprint, which appears to be the predominate offer.

The Council's Licensing Policy states:

*6.16 As the licensing authority, we will need to satisfy ourselves that a premises applying for or licensed for bingo is operating or will operate in a manner which a customer would reasonably be expected to recognise as a premises licensed for the purposes of providing facilities for bingo. Equally, we must ensure that a premises licensed for the purposes of providing facilities for bingo is operating as such and is not merely a vehicle to offer higher stake and prize gaming machines.*

*6.17 Therefore, we will expect operators (as part of their application) to provide information on:*

- *any times they intend to provide gaming machines at any times that bingo facilities are not provided*
- *how the premises will be recognised as a premises licensed for providing facilities for bingo*
- *A breakdown of gaming machine numbers (by category)*

*6.18 The licensing authority is concerned that later opening hours will attract the more vulnerable, such as those who are intoxicated or who have gambling addictions. The licensing authority will expect applicants can demonstrate that robust measures will be in place to protect the vulnerable and the additional hours are not being sought to take advantage of the gaming machine entitlement.*

These points have not been satisfactorily addressed.

### **Supervision**

For operators to effectively minimise the risk to the licensing objectives their gambling premises pose, appropriate supervision of the gambling facilities is central.

Without appropriate supervision, operators would be unable, for instance, to prevent underage access, identify and act upon indicators of harm or prevent their facilities being used for or in connection with crime.

*To contain the unavoidable risk to the licensing objectives associated with gaming machines, premises which offer machines must be appropriately supervised. (GLA 18.26)*

The use of the word 'appropriately' recognises that the arrangements for supervision will differ depending on factors including, but not limited to, the size, layout and profile of premises, business levels and the manner in which facilities are offered; for instance anonymously or through membership/account-based play, as well as the location on gambling facilities provided.

There is an exemption from the PSIA licensing requirement for in-house employees working as door supervisors at casino and bingo premises. S.178 defines door supervision as requiring someone to be responsible for 'guarding the premises against unauthorised access or occupation, against outbreaks of disorder or against damage'. However, it is not clear from the risk assessment, the extent to which security personnel will be provided and whether these will be SIA licensed persons.

The risk assessment fails to adequately "assess the level of risk" of the hazards identified i.e. it fails to decide how likely it is that someone could be harmed and how serious it could be. This is also an expectation of risk assessments in the Council's Gambling Policy. Failing to adequately assess the level of risk compromises the ability to define "suitable supervision" as required by the SR Code of Practice above.

The risk assessment fails to adequately identify and assess relevant risks. The [Gambling Harms in Manchester – Strategic Needs Assessment](#) identifies local relevant considerations. An example is that it states "Of all age groups, young people aged 16-24yrs have the highest prevalence of 'at risk' gambling despite having the lowest participation in gambling". This venue is located in a prominent night time economy/leisure area, typically frequented by younger adults the vast majority will have been consuming alcohol and may be intoxicated. These elevated risks both in relation to vulnerability and security demonstrates that

The layout appears to provide an open access counter with lack of secure protective facilities for staff, which gives rise to concerns over the facilities for ensuring their wellbeing and enabling effective supervision.

### ***Aim to permit principle and ability to request further details***

The Gambling Commission's Guidance advises that the 'aim to permit' framework provides wide scope for licensing authorities to impose conditions on a premises licence, reject, review or revoke premises licences where there is an inherent conflict with the relevant codes of practice, relevant guidance issued by the Commission, the licensing objectives or the licensing authorities own policy statement.

To reflect the breadth of licensing authority discretion, they are entitled to request such information from operators as they may require to make effective licensing decisions. The Act requires that an application must be accompanied by a minimum level of information (detailed in [Part 7](#) of this guidance). In the Commission's view, however, this does not preclude reasonable requests from licensing authorities for additional information to satisfy themselves that their licensing decision is reasonably consistent with the licensing objectives and the Commission's codes.

Therefore, I would be grateful if the applicant could advise on the following points:

1. The numbers of tablets (if any) and traditional slot machines is the venue intending to have available for use?
2. Participation rates in bingo vs gaming machine activity at equivalent venues
3. Where in the premises will people play bingo?
4. What controls will be in place to prevent machines being played on tablets at the same time as bingo content?
5. Clarification on the Proposed Machine Plan (details are illegible)
6. Ultramax(?) / Aurora(?) Spacers – are these infill machines?
7. Which terminals are bingo terminals?

8. The categories of each individual machine shown in the layout, including details of machine types including any infill machines
9. How will bingo be provided?
10. Where in the premises will people play bingo?
11. What controls will be in place to prevent machines being played on tablets at the same time as bingo content?
12. What is the estimated ratio of bingo income vs gaming machine income?
13. Confirmation of what times gaming machines will be available for play
14. Confirmation on proposed staffing arrangements, including anticipated deployments and security arrangements

Regards

**FRASER SWIFT**

Principal Licensing Officer

**Licensing Unit**

Growth and Development

Manchester City Council, Level 1, Town Hall Extension, Manchester, M60 2LA

email: [fraser.swift@manchester.gov.uk](mailto:fraser.swift@manchester.gov.uk)

tel: 0161 234 1176



**GREATER MANCHESTER POLICE - REPRESENTATION**

<b>About You</b>	
Name	<b>PC Alan Isherwood</b>
Address including postcode	1 <sup>st</sup> Floor Manchester Town Hall Extension Lloyd Street Manchester
Contact Email Address	alan.isherwood@gmp.police.uk
Contact Telephone Number	<b>0161 856 6017</b>

<b>About the Premises</b>	
Application Reference No.	<b>280378</b>
Name of the Premises	<b>Merkur Slots</b>
Address of the premises including postcode	67 Deansgate, Manchester M3 2BW

<b>Your Representation</b>
<p>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> <p>Please accept this as formal notification of the Greater Manchester Police objection to the premises licence in relation to the above premises on the grounds of Preventing Gambling being a source of Crime or Disorder, being associated with Crime and Disorder, or being used to support Crime.</p> <p>The application doesn't specify the times that the premises will be open or the times that licensable activities will be taking place which makes it difficult to determine the impact that the premises will have in the area. The Deansgate area changes in demographic throughout the day so knowing the hours of operation is vital to GMP.</p> <p>The risk assessment contained within the application states that there will be times when the premises will be single staffed and GMP are concerned that this will leave the single staff member vulnerable as the nearby Parsonage Gardens is a hot spot for Crime and Anti-Social behaviour and GMP don't think that a single staff member is sufficient to operate the premises in this area.</p> <p>There is also no mention of security staff contained within the application and again this causes GMP some concern as it isn't clear how undesirable people will be stopped from entering the premises and causing issues inside, especially if it is during a period when the premises is single staffed.</p> <p>Deansgate itself is one of the busiest thoroughfares within the City Centre and attracts a large footfall and unfortunately within this are persons who would seek to cause anti-social behaviour and commit crimes and GMP would look for a more robust Risk Assessment which includes security and no single staffing to satisfy our concerns.</p> <p>We therefore ask that this application is refused.</p>



**MANCHESTER  
CITY COUNCIL**

**Licensing & Out of Hours Compliance Team - Representation**

Name	Sandra Dawson
Job Title	Neighbourhood Compliance Officer
Department	Licensing and Out of Hours Compliance Team
Address	Level 1, Town Hall Extension, Manchester, M60 2LA
Email Address	sandra.dawson@manchester.gov.uk
Telephone Number	0161 234 1220

**Premise Details**

Application Ref No	REF 280378
Name of Premises	Merkur Slots
Address	67 Deansgate, Manchester, M3 2BW

**Representation**

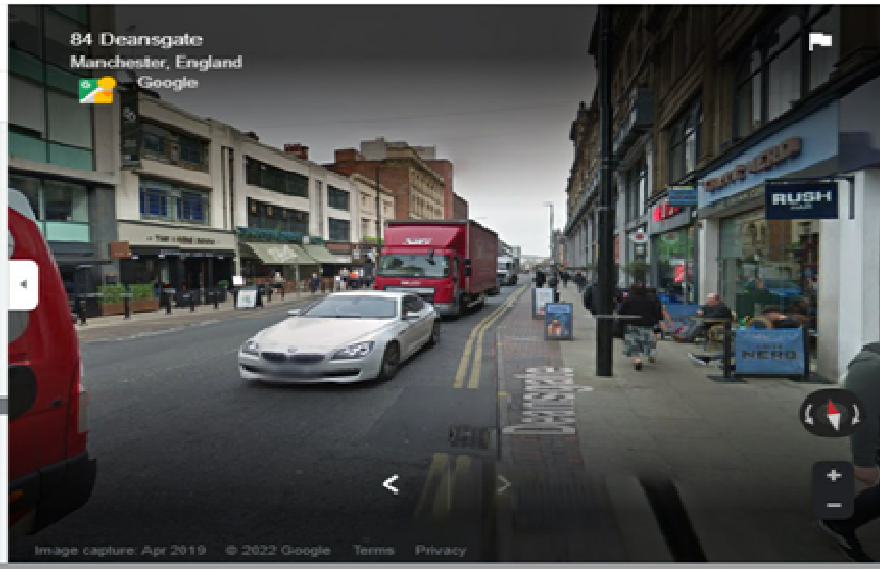
Outline your representation regarding the above application below. This representation should describe the likely effect of the grant of the licence/certificate on the licensing objectives and on the vicinity of the premises.

The Licensing and Out of Hours team have assessed the likely impact of granting a gambling licence at the above premises, taking into account a number of factors and the licensing objectives.

The Licensing and Out of Hours (LOOH) team has given consideration to Manchester City Council's Statement of Licensing Policy 2021-2026, with particular reference to 2.11 Manchester Community Safety Strategy Priority 4 Protecting vulnerable people, and 7.12 and 7.14 Evidence of pre-existing problems in the area and 7.17 Proximity of takeaways and off-licences to nightlife entertainment areas. Consideration has also been given to 'Gambling Harms in Greater Manchester' a Strategic Needs Assessment dated May 2022.

The premises wish to operate as a licensed bingo premises which include the provision of bingo tablets and Bingo Plus and Bingo Express terminals. The applicant advises that substantive facilities for non-remote bingo will be made available in accordance with legislative provisions.

The premises is located on Deansgate in the premises previously occupied by Caffe Nero. The premises is located on one of the main thoroughfares in the city centre, with high footfall and it is proposed that this part of Deansgate will be pedestrianised, which could lead to an even higher footfall due to less traffic. The immediate area is predominantly hospitality, with a mix of late night bars, restaurants and takeaways. A hotel is undergoing a refurbishment nearby, and there is also residential accommodation nearby.



There have been issues of both anti social behaviour and criminal activity in Parsonage Gardens, resulting in a number of arrests for drug dealing. LOOH have received complaints of anti social behaviour from local residents and have pro-actively monitored the area with the Anti Social Behaviour Action Team and GMP. LOOH have observed in the gardens during the day and night, both drinking and using drugs. Homeless community in the gardens approach it through an alleyway next to The Slug and Lettuce on Deansgate, which is close to the proposed premises. Their risk assessment has failed to identify this as a relevant risk.

The applicant does not state what times the premises will be open to the public. The applicant does not propose any conditions in relation to the use of SIA registered door staff but reference is made to the use of panic alarms giving direct contact with the police. They also state that they will at times operate with a single staff member. I have concerns that there are insufficient details provided to demonstrate adequate control and supervision of the venue, both in relation to security and safeguarding.

The LOOH team have concerns that the granting of this licence, in its current form, could undermine the licensing objectives.

Given the lack of any consideration for SIA registered door staff and the premises potentially being open 24 hours per day, they could have issues with people who currently use Parsonage Gardens for anti social behaviour and criminality and also people leaving licensed premises.

The 'Gambling Harms in Greater Manchester' which I exhibit as SD1, strategic Needs Assessment states that 1 in 15 Greater Manchester residents are experiencing the harmful impacts of gambling, there are 18,100 adults experiencing problem gambling, over half of the population of Greater Manchester have participated in some form of gambling in the past year and people who gamble in Greater Manchester are at higher risk of experiencing harms, Greater Manchester Police respond to at least one incident each week where serious concern has been raised of a risk of suicide directly associated with gambling.

The applicant states that it will not allow people under the age of 18 onto the premises, will operate a Challenge 25 policy, provide training and guidance to Merkur Slots staff on vulnerability, including addictive gambling, mental health and alcohol/drugs issues, yet propose having a single staffing system when they feel it is appropriate. The applicant has not demonstrated how leaving one member of staff on the premises will be able to deal with people who are involved in anti social behaviour and/or criminality, along with preventing entry for anyone under the age of 18 and identify vulnerable people who are at risk and/or experiencing problem gambling. LOOH are not confident that consideration has been given to the local area, in terms of a real knowledge of the potential impacts that could occur, having regard to the current issues of anti social behaviour/criminality, the night time economy and public sector resources.

LOOH are not satisfied, given that no conditions have been offered, to uphold the three licensing objectives and have little, if any, regard to the Statement of Licensing Policy, the 'Gambling Harms in Greater Manchester' or any serious consideration to the impact that the grant of this licence would have on the local area.

Recommendation: Refuse Application

Date: 14 October 2022

Public Health Team (Manchester City Council) would like to make a representation in relation to the below application for a new gambling premise licence:

**Premises: Merkur Slots, 67 Deansgate, Manchester, M3 2BW**

**Ward: Deansgate**

**Reference: 7PA280378**

The application does not sufficiently demonstrate consistency with the following licencing objective:

- **Protecting children and other vulnerable persons from being harmed or exploited by gambling'**

The attached report highlights evidence relating to gambling harms in Manchester and the contribution impact in granting this application is likely to have on vulnerable groups.

In summary,

- The application does not adequately assess the potential risks to the local population in relation to harms from gambling as described in section 1 of the report.
- Insufficient detail of the number and type of 'gaming machines' which are considered to be one of the most harmful gambling products suggests there will be an increased exposure to harmful gambling products to the local population.
- The provisions in place for age verification do not provide the necessary detail and assurance that under 18's will not participate in gambling.
- The application does not provide details to support mitigation in the eventuality of risks to staff safety.
- Individuals seeking treatment support for gambling harms is significantly lower in relation to those experiencing harms; and additional exposure to harmful gambling products is likely to negatively impact on these numbers.

## Public Health Evidence in Response to Gambling Licence Application – Deansgate

14 October 2022

Contact: Naaira Zaman

### Introduction

This brief report summarises available evidence on gambling harms in response to a recent application for a new gambling premise licence in Deansgate. The report refers to information and data detailed in the Greater Manchester (GM) Strategic Needs assessment on Gambling Harms. (1)

#### 1. Context - Gambling Harms

It is estimated that 18,100 adults in Greater Manchester are experiencing problem gambling. This is a conservative estimate and is 1.5 times higher than the national average. 97,400 adults in Greater Manchester who gamble and are classified 'at low or moderate risk' (4.3%). 1 in 15 residents in Greater Manchester are experiencing the harmful impacts of gambling. For every person directly affected by their own gambling it is estimated that an average of six others are indirectly affected.

In Manchester, this equates to 3,500 adults experiencing problem gambling; 23,900, adults who gamble classified 'at low or moderate risk', with an estimated 35,300 individuals experiencing gambling related harms.

Students residing in halls are excluded from gambling prevalence statistics. In 2019, a NUS survey found three in five students reported to have gambled in the last 12 months with 16% of students who gamble identified as experiencing harms or addiction.

Although the legal age for gambling in the UK is 18 (except for football pools, society lotteries and category D gaming machines such as penny falls or crane grabs) 11% of children aged 11-16 in the UK have gambled in the last week, and 36% in the last 12 months according to national research (2) This is higher than smoking tobacco cigarettes or taking illegal drugs.

People who gamble in Greater Manchester are significantly more likely to experience problem gambling and harms because of their gambling. Some of these reasons include

- Greater Manchester has a younger population
- High levels of social economic exclusion compared to the national average
- More likely to; participate in more harmful products and gamble on a higher number of activities.

The GM strategic Needs assessment includes 'electronic gaming and slot machines' in gambling products considered to be most harmful. GM residents are more likely to report on gambling, which include Bingo, Electronic gaming machines in bookmakers (sometimes known as FOBTs – Fixed Odds Betting Terminals), Betting on sports events, Online gambling (including slots, casino or bingo games), Scratch cards.

Manchester's Gambling policy (2022-25) references groups that could be considered more vulnerable to problem gambling as follows:

- Younger people, including students
- Those who are unemployed and/or with constrained financial circumstances

- Those from minority ethnic groups
- Those under the influence of alcohol or drugs
- Problem gamblers seeking treatment
- Homeless people
- Those living in areas of greater deprivation
- Those with other mental health issues and substance abuse/misuse disorders
- Those with poorer intellectual functioning
- Custodial and non-custodial offenders

## **Reasons**

### **Assessment of local risk in relation gambling harms**

Manchester is the sixth-most deprived local authority in England. Research suggests that people living in the most deprived communities are nearly twice as likely to participate in gambling and are seven times more likely to experience problem gambling, compared with those living in the least deprived communities. Some of our most deprived communities are also likely to be significantly impacted by the cost-of-living crisis, resulting in further deprivation.

Deansgate is a popular ward within city centre owing to a range of amenities and facilities located within or near the ward. This results in high footfall not only from residents within the city of Manchester, but also visitors from Greater Manchester and beyond.

The Public Health Team do not feel the applicant has adequately assessed the potential risk to the local population in relation to harms from gambling with reference to the information section one.

### **Age verification checks**

Manchester has a relatively young population including a significant student population which are either residing or commuting into the city. We know that young people aged 16-24 are most at risk from harm from gambling despite having lower participation rates. Additionally, Fruit or slot machines were the second most popular gambling activity reported amongst 11–16-year-olds. (2)

It is understood that under 18's will not have access to the premise, but the application does not make clear who will be conducting age verification checks, at which intervals and the regularity of these checks.

A National test purchase exercise found that 84% of licensed premises failed to prevent under-18's from gambling on fruit and slot machines, with many young people citing this as their first experience of participating in gambling.

### **Exposure to the most harmful products**

Although the premises is classed as a 'bingo premises' it will also include machines. Electronic gaming and slot machines are considered to be one of the most harmful gambling products. The application does not make clear the number and type of machines which will be available for use and subsequently will need to be risk assessed accordingly. The application also references use of non-remote bingo via tablets and clarity is needed on whether they also offer gaming machine content.

Additionally, the variation of different category machines, alongside non-remote Bingo and Electronic Bingo, suggests individuals will be exposed to a higher number of gambling products of which some are considered to be most harmful.

### **Staff safety**

Assessment of the different demographics of populations during the day and night-time economy have not been considered. The application states that 'our teams remain with customers on the venue floor rather than behind a counter'. Anecdotal analysis suggests incidents on gambling licensed premises may be increasing and therefore a balance between customer interaction and staff safety requires appropriate mitigation.

### **Treatment support**

The application mentions the promotion of treatment support services, however, the number of people experiencing harms from gambling is significantly underrepresented when looking at individuals seeking treatment. Data from Beacon Counselling Trust (April 2016-March 2021) shows that on average 72 people access specialist gambling support each year in Manchester (3,500 estimated to experiencing problem gambling in Manchester)

Manchester City Council in conjunction with key partners supported the opening of new gambling treatment and support clinic, located at Change Grow Live's Phoenix Mill site in April 2022. This offers free and confidential support for residents that need help or advice on gambling or the impact of gambling.

Granting a new licence in this area would undermine the efforts made to date to reduce harms and potentially lead to mixed messages for residents.

### **Summary**

Given the evidence reviewed, it is likely that the addition of this gambling establishment in Manchester would put the local population, including children, at increased risk of harm from gambling and counteract some of the progress made in supporting residents over the last 12 months.

Based on the evidence outlined above, Public Health feel that the application is not consistent with licencing objective of the 'Protecting children and other vulnerable persons from being harmed or exploited by gambling'

### **References**

- (1) [Gambling Harms in Greater Manchester – Strategic Needs Assessment \(greetermanchester-ca.gov.uk\)](https://www.greetermanchester-ca.gov.uk)
- (2) [Young People and Gambling 2019 - Gambling Commission](#)



**From:** [REDACTED]  
**Sent:** 16 January 2023 11:20  
**To:** Fraser Swift <fraser.swift@manchester.gov.uk>; Sandra Dawson <sandra.dawson@manchester.gov.uk>; Naaira Zaman <Naaira.Zaman@manchester.gov.uk>; PH Regulatory <phregulatory@manchester.gov.uk>; Julie Jerram <julie.jerram@manchester.gov.uk>  
**Cc:** Premises Licensing <Premises.Licensing@manchester.gov.uk> [REDACTED]  
[REDACTED] alan.isherwood <alan.isherwood@gmp.police.uk>  
**Subject:** Merkur Slots, Deansgate, Manchester - New Bingo Premises Licence Application  
PCX:000085000000358  
**Importance:** High

Dear all,

I hope you are well and happy new year.

As you know the hearing is now fast approaching on the 30<sup>th</sup> December.

Please see attached an updated Local Area Risk Assessment, which has been updated to reflect the current streetscape and following comments in your representations, and comments and discussions from the meetings with PC Isherwood and Fraser and Sandra.

I have spoken with my client with regards to the concerns raised in the objections, and in order to try and alleviate concerns, we are happy to offer the below additional conditions in addition to what is already submitted to add to the premises licence application:

1. *For 3 months from the date the premises is open to the public, the date to be confirmed in writing to the Licensing Authority, a SIA licensed door supervisor shall be on duty from 21:00 until close on Fridays and Saturdays. Following the initial 3-month period, the requirement for door staff shall be risk assessed and cognisance taken of police advice.*
2. *'There shall be no pre-planned single staffing at the premises from 20:00 until closing. Should the premises be single staffed after this time, the magnetic door locking system must be in constant use.*

The reason for the wording of condition 1 is that the Gambling Act does not permit minor variations, so any condition amendments would need a full variation. Therefore, we have drafted the condition as so to fall away automatically, after a 3-month trial period.

As you will appreciate, my client wants to retain the flexibility of a licence with no restriction on hours, as this provides us the ability to manage the demand for the site and adjust our opening hours accordingly.

I look forward to any comments you may have, and me and [REDACTED] will be in touch further this week regarding your objections.

Many thanks

[REDACTED]

# Merkur Slots, 67 Deansgate, Manchester M3 2BW

## Local Area Risk Assessment

Trading Name:	Merkur Slots
Premise	67 Deansgate, Manchester M3 2BW
Local Authority:	Manchester City Council
Premise Licence No:	New application
Operator Licence No:	000-003266-N-103444-025 (Merkur Slots UK Limited)
Company Details:	Merkur Slots UK, 1a Seebeck House, Seebeck Place, Knowlhill, Milton Keynes MK5 8FR Premise Licence Holder: Merkur Slots UK Limited
Name and Title of Assessor:	[REDACTED]
Date of Assessment:	.2022
Review Date:	On opening in conjunction with staff

Page 9 of 98

## Local Area Profile Risk Factors

Local Risk Profile:	Merkur Slots a former Café Nero coffee shop on Deansgate one of the main throughfare roads in the city centre. Deansgate has a mixture of retail, food and leisure outlets. The premise being located at the end closest to the main shopping areas of the city. Visits were made to the location during daytime and weekend evenings to assess Deansgate area at varying times. During daytime hours the area consisted of shoppers, local office workers in addition to some tourists visiting the local leisure premises. On the evening of Friday 16 <sup>th</sup> September, the entire city Centre was very busy with a George Ezra concert taking place in addition to the usual weekend visitors. The area is very similar to that of several Merkur Slots venues such as Argyle Street - Glasgow, New Street - Birmingham, Cornmarket - Derby where during the daytime is mainly shoppers, local workers and those out for leisure and then changes to a more vibrant and livelier feel in the evenings and later at night. Merkur has a lone worker Risk Assessment and will complete a Security Risk Assessment once a venue has opened and has real experience if trading in the area.
Establishments of note:	Manchester Crown Court, Crown Square, Barcroft St, M3 3EB, Manchester Magistrates' Court, Crown Square, Wood St, M60 1PR
Adjoining premises:	Rush Hairdressers, former Bar Burritto (currently unoccupied)
Crime statistics:	In the year ending December 2021, the crime rate in Manchester was higher than the average crime rate across similar areas such as Blackpool Liverpool Birmingham. (police.uk). Crime data for greater Manchester is missing since July 2019 due to an IT systems error so only historical data over 3 years old is available. (Streetcheck.co.uk)
Population:	86.2% of households are in Higher and intermediate managerial, administrative, or professional positions and Supervisory, clerical, and junior managerial/administrative/professional positions. Across the UK as a whole, the gender split is roughly equal at 49% male, 51% female. This address in Manchester Central constituency is broadly in line with those figures, with 54% male. There is a wide variety of age groups in the area the main groups in the bracket 25-44 with 81.3% being single. (streetcheck.co.uk)
Culture:	As whole, the UK population claims itself as approximately 86% white, with this area being 80% white. 6.6% of the population are of mixed ethnicity and 5.6% are Chinese. In this area (Deansgate, Manchester), 67% of the residents were born in England, which is significantly below the English average. (streetcheck.co.uk)
Unemployment:	In the year 2021 75.9% of the area's population were economically active compared to 78.4% in GB. 69.1% of the economically active were employed. Unemployment was 6.6% compared to 4.6% in the northwest and 4.4% in GB. Of those economically inactive 29.7% were students, 20.9% long term sick and 5% retired. (nomis)
Deprivation:	According to the 2019 Index of Multiple Deprivation (IMD), Manchester ranks 6 out of 326 local authorities in England, where 1 is the most deprived. 43% of Manchester's LSOAs are in the most deprived 10% in England on the IMD. Within Manchester itself Deansgate is ranked at 29 out of 32 with 24.1% of the areas population deprived, Miles Platting and Newton Heath have the highest % - 62.7. (IMD 2019)
Local Police:	Greater Manchester Police City Centre, Town Hall, Lloyd St, M60 2LA
Visit with Key Representation Stakeholders	<p><b>PC Isherwood</b></p> <p>At 11pm on Saturday 26<sup>th</sup> November 2022 [REDACTED] – Area Manager met with PC Alan Isherwood at his request to observe the level of activity nighttime activity on Deansgate. [REDACTED] met at 9pm and stayed until half past midnight walking Deansgate and areas such as Parsonage Green off the main road. It was extremely busy with the run up to Christmas, the World Cup and the traffic congestion due to the works to convert Deansgate to one way. PC Isherwood explained that Friday and Saturday nights were the very busiest and that his concerns were around</p> <ol style="list-style-type: none"> <li>1. Local drug dealers, who try to sell drugs to the queues waiting to enter bars and clubs trying to enter the premises</li> <li>2. Drunk people trying to enter the premises</li> <li>3. Vulnerable and homeless trying to enter the premises</li> <li>4. Single Manning</li> <li>5. 24/7 trading</li> <li>6.</li> </ol> <p>He advised;</p> <p>Merkur Slots would benefit from an SIA Guard at the premises on Friday and Saturday nights and that there should be no single manning for an initial period of 3 months after which it could be reviewed based on the activity that had been observed during this time.</p>



**The Gambling Act 2005 sets out the three licensing objectives (LO), which are:**

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
- Ensuring that gambling is conducted in a fair and open way.
- Protecting children and other vulnerable people from being harmed or exploited by gambling.

**Localised Risks to the Licensing Objectives**

This Local Area Risk assessment takes into consideration Manchester City Council local authority Statement of Gambling Principles and Manchester City Council Intelligence Hub.

**Environmental Factors**

In preparing this assessment Merkur Slots has considered the relevance of environmental factors. In this context, environmental factors include the physical location of schools, playgrounds, residential areas, other retail premises and locations (bus stations, tube stations) which influence footfall. We have set out below our position on risk in this area:

Licensing Objectives	Local Risks	Control Measures
Page 101 Protecting children and other vulnerable people from being harmed or exploited by gambling	<p><b>Unemployment:</b>                      In the year 2021 75.9% of the areas population were economically active compared to 78.4% in GB. 69.1% of the economically active were employed. Unemployment was 6.6% compared to 4.6% in the north west and 4.4% in GB. Of those economically inactive 29.7% were students, 20.9% long term sick and 5% retired. (nomis)</p> <p><b>Deprivation:</b>                      According to the 2019 Index of Multiple Deprivation (IMD), Manchester ranks 6 out of 326 local authorities in England, where 1 is the most deprived. 43% of Manchester's LSOAs are in the most deprived 10% in England on the IMD. Within Manchester itself Deansgate is ranked at 29 out of 32 with 24.1% of the areas population deprived, Miles Platting and Newton Heath have the highest % - 62.7. (IMD 2019)</p> <p><b>Schools and Education</b>                      The University of Law, 2 New York St, M1 4HJ                      Sola Fide Trust, Church House, 90 Deansgate, M3 2GH                      The School of Journalism, 16-18 Albert Square, M2 5PE                      Abbey College, 5-7 Cheapside, M2 4WG                      Chetham's School of Music, Long Millgate, M3 1SB                      MC Academy, Royal Buildings, 2 Mosley St, M2 3AN                      International British Theatre School, 61 Mosley St, M2 3HZ                      Britannia English School, 12 Charlotte St, M1 4FL</p>	<p><b>Age Verification</b>  <i>Ensuring Under 18's do not have access to licensed premises</i></p> <p>All Merkur Slots venues are strictly adult only (over 18's only).</p> <p>Gambling is an age restricted product and Merkur Slots operates a 'Think 25' policy.</p> <p>Age verification is embedded in training platforms and responsible gambling policies.</p> <p>Over 18's notices are displayed on the entrance.</p> <p>Think 25 advertising is prominently displayed throughout the premise.</p> <p>Merkur Slots Manchester Premise frontage will be of a style which obscures the interior with no advertising depicting images that may appeal to children.</p> <p>Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>Merkur Slots operate a comprehensive Think 25 Policy, age verification checks are carried out and recorded, any person unable or unwilling to verify their age with appropriate ID will be told to leave, if they have managed to play machines, their staked money will be returned to them.</p>

Appendix 8, Item 4

The Manchester College, St Johns Centre, Quay St, M3 3BE  
 Manchester Central College, 1 Harter St, M1 6HY  
 The University of Manchester, Oxford Rd, M13 9PL  
 Manchester Metropolitan University, All Saints Building, M15 6BH  
 Screen and Film School Manchester, Unit 6 & 8, Left Bank, New Quay St, M3 3AN

#### **Community Centres and Youth Centres**

Chabad In The City, 36 John Dalton St, M2 6LE  
 Young Manchester, Centurion House, 129 Deansgate, M3 3WR  
 YMCA, Liverpool Rd, M3 4JR  
 UK Care and Secure Transport Services, 91 Princess St, M1 4HT

#### **Parks, play grounds and sports/leisure facilities**

Saint John's Gardens, Lower Byrom St, M3 4AP  
 Roman Gardens, Duke St, M3 4JL  
 Castlefield Urban Heritage Park, Duke St, M3  
 Bannatyne Health Club and Spa, Sunlight House, Quay St, M3 3JZ  
 Livingwell Health Club, 303 Deansgate, M3 4LQ  
 The Y Club, Liverpool Rd, M3 4JR  
 Parsonage Gardens, St Mary's Parsonage, M3 2LF

#### **Vulnerable and addiction support services**

The Diocese of Manchester, Church House, 90 Deansgate, M3 2GH  
 Mothers' Union Manchester, 3, Church House, 90 Deansgate, M3 2GH  
 Adult and Young People's Drug and Alcohol Service, Zion Community Centre, 339 Stretford Rd, Hulme, M15 4ZY  
 Back on Track, 20 Swan St, M4 5JW

#### **Homeless shelters and food banks**

Shelter, 5 Samuel Ogden St, Greater, M1 7AX  
 Street Support Network, M1 2HY  
 Coffee4Craig Street Kitchen, 42-46 Victoria St, M3 1ST  
 Centrepoint, 52 Oldham St, M4 1LE  
 Embassy Village, Egerton St, M15 4NU  
 Barnabus, 45 Bloom St, M1 3LY  
 Lifeshare Ltd, First floor, 27 Houldsworth St, M1 1EB  
 Depaul UK The St Peter's House, Oxford Rd, M13 9GH  
 The Men's Room, Raven House, 113 Fairfield St, M12 6EL  
 Manchester South Central Foodbank, St Edmund's Church, Alexandra Road South, M16 8EZ and Unit 3, Wesley Centre, Royce Road Corner of, Old York St, Hulme, M15 5BP  
 Manchester Central Foodbank, Oxford Rd, M13 9PG

#### **Medical Centres, Care Homes and Mental Health facilities**

City Health Walk In Centre, 14 Cross St, M2 7AE  
 The Medical Centre, 17 St John St, M3 4DR  
 The Doctors Clinic, Ground Floor, London Doctors Clinic, Optimised Personal Wellness, Lower, 64 Bridge St, M3 3BN  
 City Health Walk In Centre, 32 Market St, M1 1PL

Age verification test purchasing, and mystery shopper visits are frequently carried out by 3rd party companies - Check Policy and Store Checker. Age verification tests for 2019/2020 resulted in a pass rate of 96.09% which is 20% higher than the industry average, all venues receive 3 or 4 random test visits per year.

Test purchase fails are reviewed within 48 hours by the Area Manager, this involves reviewing CCTV footage of the incident and implementing appropriate training or where necessary disciplinary action.

All age verification checks are recorded on the IHL SMART Tablet AV App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.

Results of age verification checks and third-party results are shared with the Gambling Commission.

Proof of Age scheme in place with application forms available in the venue.

The children and young persons gambling participation survey shows that the number of 11-16 years olds that say they have gambled on fruit machines of whatever kind in an arcade, pub or club is around 2%. Of those around a half to two-thirds do so legally on Category D fruit machines which are located in FECs or holiday parks, where any play will be of short duration (as families will be on a day trip or holiday), in venues which they can only access with their parents, and in premises licensed to offer Category Ds which are as a result tightly-regulated.

We also know from a study by Professor David Forrest and Dr Ian McHale that whilst adolescents at the coast are more likely to participate in gambling activities than those that do not, they are no more likely to be problem gamblers than those that do not live at the coast. This is an important finding. Many people cite early exposure to gambling as a cause of later gambling problems. There is no evidence of a causal link. As David Forrest stated at conference in Toronto in 2012 'marginal gamblers induced to participation by ease of access do not appear prone to problem gambling and more children gambling does not carry through to more children being problem gamblers. Panic about arcades does not appear justified' <https://www.gamblingcommission.gov.uk/PDF/Young-People-Gambling-Report-2019>

#### **Vulnerability**

Training and guidance are given to Merkur Slots staff on vulnerability (the inability or limited ability of people to control their actions). This includes addictive gambling, mental health, alcohol or drugs issues.

Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).

<p>           Doctorcall Regents Park Clinic, 4 Exchange St, M2 7HA            Samedaydoctor, Fabric Building 30 Queen Street, M2 SHX            City Centre Therapy, 82 King St, M2 4WQ            D R Downes, 244 Deansgate, M3 4BQ            The BDD Therapy Clinic, 5th Acresfield St Ann's Square M2 7HA            Meridian, Milton Hall, 244 Deansgate, M3 4BQ            Pall Mall Medical, 61 King St, M2 4PD            Tegg children hospital, 11 Kennedy St, M2 4AT            Bupa Health Centre, 4 Marble St, Spring Gardens, M2 1FB            Hospitals, 43A Brown St, M2 2JJ         </p> <p> <b>Pawnbrokers and Loan Shops</b>            Prestige Pawnbrokers, 243 Deansgate, M3 4EN            Ramsdens, 1 King St, M2 6AW            Mays Pawnbrokers &amp; Jewellers, 3 Exchange St, M2 7EA            Manchester Credit Union, Queens Court, 24 Queen St, M2 SHX         </p> <p> <b>Gambling premises</b>            Manchester235, 2 Watson St, M3 4LP            Genting Casino, 110 Portland St, M1 4RL            Grosvenor Casino, 35/39 George St, M1 4HQ            Casino Circle, Steam Packet House, 72-76 Cross St, M2 4JG            Bongos Bingo, Albert Hall, 27 Peter St, M2 5QR            Napoleons Casino, 57 Portland St, M1 3HP            Nobles Amusements, M1 4AJ            The Printworks, 27 Withy Grove, M4 2BS            Admiral Casino, Wellington House, 39 Piccadilly, M1 1LQ            Pound Bingo, The Copper Room, Deva Centre, M3 7BG            Bingo Balls, Unit 21-22, The Printworks, M4 2BS            William Hill, 47 Deansgate, M3 2AY            Betfred, 38 King St W, M3 2WZ            Betfred, 133 Deansgate, M3 3WR            Ladbrokes, 15 Cross St, M2 1WE            William Hill, 40, 42 Oxford St, M1 5EJ            William Hill, 30 High St, M4 1QB            Betfred, 8 High St, M4 1QB            Betfred, 10 Mosley St, M2 3AQ            Paddy Power, F2, City Tower, 44 Parker St, M1 4BD            Betfred, 14 Nicholas St, M1 4EJ            William Hill, 40, 42 Oxford St, M1 5EJ         </p> <p> <b>Public Houses and Alcohol Licensed Premise</b>            The Botanist, 78 Deansgate, M3 2FW            The Moon Under Water, 68-74 Deansgate, M3 2FN            Slug &amp; Lettuce, 64-66 Deansgate, M3 2EN            Roxy Ball Room, 76-78 Deansgate, M3 2FN            Be At One, 80 Deansgate, M3 2ER            Point Blank, Basement, 78, Deansgate, M3 2FW            The Liquor Store, Maybrook House, 40 Blackfriars St, M3 2EG            Arcane, 2 S King St, M2 6DQ            The Sawyer'S Arms, 138 Deansgate, M3 2RP         </p>	<p>All staff complete on boarding and 6 monthly refresher training which includes Safeguarding Children and Vulnerable People and Customer Interaction.</p> <p>Staff are trained how to deal with vulnerable customers and how to make effective interactions, any difficult cases are referred to our compliance team for review and resolution.</p> <p>Merkur Slots take 'know your customer' seriously including affordability checks, engaging with customer on products to enabled an informed choice and take a risk-based approach to harm minimization.</p> <p>Merkur Slots, Manchester will support the promotion of the NHS Northern Gambling Service within the premises and guide any vulnerable people or those at risk of harm from gambling towards this support service.</p> <p>Merkur Slots will incorporate reference to the NHS Northern Gambling Service in its employee Safeguarding Vulnerable People from Gambling Harm training modules.</p> <p><b>Customer Interaction</b> Merkur Slots provide comprehensive customer interaction training, instruction and supporting policies to all staff in this area (via training platforms, training centres and Compliance Manual).</p> <p>Staff are provided with the training to enable them to provide guidance on safer and responsible gambling.</p> <p>Staff are trained on conducting effective customer interactions, identifying behavioural changes and how to identify and interact with players who exhibit signs of developing problems with their gambling.</p> <p>Staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant.</p> <p>Customer interactions may result in the customer being guided to gambling support services such as Gamcare encouraged to use a self-help tool to assist them with managing their gambling behaviour, such as the Playright App or Self-Exclusion.</p> <p>All customer interactions are recorded on the IHL SMART Tablet Interaction App, this data is collated centrally and regularly reviewed by an independent team of compliance auditors.</p> <p><b>Player Protection</b> <i>To identify signs associated with problem gambling and people who may be at risk of gambling related harm</i> <i>Failure to provide information to customers on responsible gambling</i> <i>Failure to maintain and administer the self-exclusion process, including breaches and reinstatement reviews</i></p>
---	--

The Lost Dene, 144 Deansgate, M3 3EE  
 The Bridge Tavern, 58 Bridge St, M3 3BW  
 BOX, 125 Deansgate, M3 2BY  
 Panacea, 14 John Dalton St, M2 6JR  
 Black Sheep, 2-4 St Ann St, M3 2BW  
 Revolution, Arkwright House, Parsonage Gdns, M3 2LF  
 Dirty Martini, 1 Peter St, M2 5QR  
 Bar Hütte, 235 Deansgate, M3 4EN  
 Yours Restaurant & Bar, 82 Deansgate, M3 2ER  
 Las Iguanas, 84 Deansgate, M3 2ER  
 Rosa's, The Old Courthouse, 184 Deansgate, M3 3WB  
 Motley, 115 Deansgate, M3 2NW  
 Tast Catala, 20-22 King St, M2 6AG  
 Gaucho, 2A St Mary's St, M3 2LB  
 Bem Brasil, King St W, M3 2GQ  
 La Viña, 105/107 Deansgate, M3 2BQ  
 San Carlo, 42 King St W, M3 2WY  
 Australasia, 1 The Avenue, Deansgate, M3 3AP  
 Hawksmoor, 184, 186 Deansgate, M3 3WB  
 Topkapi Palace, 205 Deansgate, M3 3NW  
 El Rincon de Rafa, 244 Deansgate, M3 4BQ  
 Siam Smiles, 253, Deansgate, M3 4EN  
 Cibo, Unit 4, Great Northern Warehouse, M3 4EN  
 Hilton, 303 Deansgate, M3 4LQ  
 Club Liv, 111A Deansgate, M3 2BQ  
 Tesco Express, Maybrook House, 50-52 Deansgate, M3 2FE  
 Sainsbury's, 130-136 Deansgate, M3 2GQ  
 SPAR, 8 St Mary's Gate, M1 1PX

#### Residential Areas

Deansgate is a predominantly nonresidential road in the city centre. The surrounding areas have several new residential areas, mainly apartment blocks privately owned or rented.

#### Bus stops and other Transport links

Free City centre buses run along Deansgate in addition to regular Bus services across the city and surrounding areas.  
 Tram Stops at Castlefield, Exchange Square, St Peter's Square  
 Deansgate Train Station, M3 4LG

#### Locally Identified Premises

Everyman St. John's, ABC Buildings, 23 Quay St, M3 4AS (cinema)  
 Science and Industry Museum, Liverpool Rd, M3 4FP  
 Castlefield Visitors Centre, M3 4JR  
 Castlefield Bowl, Rice St, M3 4JR  
 Manchester Central Convention Complex, Windmill St, M2 3GX  
 John Rylands Research Institute & Library, 150 Deansgate, M3 3EH  
 National Football Museum, Todd St, M4 3BG  
 Manchester Central Library, St Peter's Square, M2 5PD  
 The Portico Library, 57 Mosley St, M2 3HY  
 Manchester City Council, Town Hall, Albert Square, M2 5DB

Staff are aware of the importance of social responsibility and are trained to advise customers on gambling responsibly and the identification of potential gambling harm.

'Stay in Control' Posters and Leaflets containing the Gamcare helpline number are in prominent locations within the premise and in private areas, such as customer toilets.

Merkur Slots will actively seek to support and be involved in any local initiatives targeted at reducing harm caused by gambling.  
 Socially Responsible messaging is implemented on all digital B3 and Cat C machines.

All machines display Gamble Responsibly stickers with helpline contact details.

Senior Management are members of the Bingo Association Executive and Socially Responsible Committees and BACTA Divisional and Socially Responsible Committees. They take the opportunity to actively participate with these trade bodies, collaborating with other operators to promote responsible gambling initiatives including the development of an Accredited Gamcare training programme and the Machine Messaging trial and evaluation.

The Gamcare Helpline Annual Statistics 2020 reported that calls received from people experiencing problems with their gambling were low in High Street Arcade Gaming Machines at 3% compared to Betting Shop Gaming Machines at 15%. The vast majority of calls were received from people within the on-line sector.

#### Deprivation

Whilst the premise may be near or in an area of relative deprivation, Merkur Slots takes the view that individual customers must be treated holistically, and the information provided in this document are designed to identify individuals that could potentially be at risk of gambling related harm

Merkur Slots operates on the basis that its controls and best practice is always adopted therefore, it is not a question of degrees of vigilance being implemented in different areas.

#### Homelessness

Some premises are used by the homeless for warmth and company. Merkur Slots treats all customers with dignity and has a clear policy on begging.

Staff are trained to deal with vulnerable people in a sympathetic manner, any difficult cases are referred to our compliance team for review and resolution.

Staff are trained how to manage situations with homeless people seeking refuge.



	<p>Royal Exchange Theatre, St Ann's Square, M2 7DH</p> <p><b>Regular Festivals, Town Events and Mass Gatherings</b>          Many festivals and events are held in and around the City Centre throughout the year – including Pride, Christmas Markets, concerts at The Ethiad and Old Trafford, large sporting events. Music events and concerts at Castlefields and The Arena.</p>	<p>A line of contact will be created with local high-risk premises, homeless shelters, foodbanks to provide social responsibility information.</p>
<p>Preventing gambling being a source of crime or disorder, being associated with crime and disorder or being used to support crime</p>	<p><b>Crime statistics:</b>          In the year ending December 2021, the crime rate in Manchester was higher than the average crime rate across similar areas such as Blackpool Liverpool Birmingham. (police.uk). Crime data for greater Manchester is missing since July 2019 due to an IT systems error so only historical data over 3 years old is available. (Streetcheck.co.uk)</p> <p><b>Local Police:</b>          Greater Manchester Police City Centre, Town Hall, Lloyd St, M60 2LA</p> <p><b>Public Houses and Alcohol Licensed Premise</b>          The Botanist, 78 Deansgate, M3 2FW          The Moon Under Water, 68-74 Deansgate, M3 2FN          Slug &amp; Lettuce, 64-66 Deansgate, M3 2EN          Roxy Ball Room, 76-78 Deansgate, M3 2FN          Be At One, 80 Deansgate, M3 2ER          Point Blank, Basement, 78, Deansgate, M3 2FW          The Liquor Store, Maybrook House, 40 Blackfriars St, M3 2EG          Arcane, 2 S King St, M2 6DQ          The Sawyer'S Arms, 138 Deansgate, M3 2RP          The Lost Dene, 144 Deansgate, M3 3EE          The Bridge Tavern, 58 Bridge St, M3 3BW          BOX, 125 Deansgate, M3 2BY          Panacea, 14 John Dalton St, M2 6JR          Black Sheep, 2-4 St Ann St, M3 2BW          Revolution, Arkwright House, Parsonage Gdns, M3 2LF          Dirty Martini, 1 Peter St, M2 5QR          Bar Hütte, 235 Deansgate, M3 4EN          Yours Restaurant &amp; Bar, 82 Deansgate, M3 2ER          Las Iguanas, 84 Deansgate, M3 2ER          Rosa's, The Old Courthouse, 184 Deansgate, M3 3WB          Motley, 115 Deansgate, M3 2NW          Tast Catala, 20-22 King St, M2 6AG          Gaucho, 2A St Mary's St, M3 2LB          Bem Brasil, King St W, M3 2GQ          La Viña, 105/107 Deansgate, M3 2BQ          San Carlo, 42 King St W, M3 2WY          Australasia, 1 The Avenue, Deansgate, M3 3AP</p>	<p><b>Premise Security and violence in the workplace</b>  <i>Poor security control measures which may increase vulnerability to crime</i>  <i>Failure to protect employee and customers from harm during the hours of late-night opening</i></p> <p>Merkur Slots Manchester is subject to a separate security risk assessment, local factors are considered, and proportionate control measures/physical security measures are installed.</p> <p>Merkur Slots Manchester will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by staff when working in the service area. Ability to review CCTV remotely and provide footage to relevant parties when required.</p> <p>Floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilets can be observed and staff will regularly patrol the gaming floor to supervise and interact with customers to identify underage or vulnerable persons.</p> <p><b>Late Night Operation</b>          Maglock systems are available for staff to deploy at any point in time to protect against crime or disorder and are always deployed during times of public houses closing.</p> <p>Dedicated Regional Night Managers are employed to support venues with security incidents.</p> <p>Area Manager's operate a late night rota system to monitor the 'late night contact number' so venues always have an Operational Manager to call upon for any issues during late night operation.</p> <p>The premise and staff are protected by a Staffguard security system, Maglock and intruder alarms are installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police</p>

	<p>Hawksmoor, 184, 186 Deansgate, M3 3WB  Topkapi Palace, 205 Deansgate, M3 3NW  El Rincon de Rafa, 244 Deansgate, M3 4BQ  Siam Smiles, 253, Deansgate, M3 4EN  Cibo, Unit 4, Great Northern Warehouse, M3 4EN  Hilton, 303 Deansgate, M3 4LQ  Club Liv, 111A Deansgate, M3 2BQ  Tesco Express, Maybrook House, 50-52 Deansgate, M3 2FE  Sainsbury's, 130-136 Deansgate, M3 2GQ  SPAR, 8 St Mary's Gate, M1 1PX</p> <p><b>Pawnbrokers and Loan Shops</b>  Prestige Pawnbrokers, 243 Deansgate, M3 4EN  Ramsdens, 1 King St, M2 6AW  Mays Pawnbrokers &amp; Jewellers, 3 Exchange St, M2 7EA  Manchester Credit Union, Queens Court, 24 Queen St, M2 5HX</p> <p><b>Gambling premises</b>  Manchester235, 2 Watson St, M3 4LP  Genting Casino, 110 Portland St, M1 4RL  Grosvenor Casino, 35/39 George St, M1 4HQ  Casino Circle, Steam Packet House, 72-76 Cross St, M2 4JG  Bongos Bingo, Albert Hall, 27 Peter St, M2 5QR  Napoleons Casino, 57 Portland St, M1 3HP  Nobles Amusements, M1 4AJ  The Printworks, 27 Withy Grove, M4 2BS  Admiral Casino, Wellington House, 39 Piccadilly, M1 1LQ  Pound Bingo, The Copper Room, Deva Centre, M3 7BG  Bingo Balls, Unit 21-22, The Printworks, M4 2BS  William Hill, 47 Deansgate, M3 2AY  Betfred, 38 King St W, M3 2WZ  Betfred, 133 Deansgate, M3 3WR  Ladbrokes, 15 Cross St, M2 1WE  William Hill, 40, 42 Oxford St, M1 5EJ  William Hill, 30 High St, M4 1QB  Betfred, 8 High St, M4 1QB  Betfred, 10 Mosley St, M2 3AQ  Paddy Power, F2, City Tower, 44 Parker St, M1 4BD  Betfred, 14 Nicholas St, M1 4EJ  William Hill, 40, 42 Oxford St, M1 5EJ</p> <p><b>Residential Areas (impacted by Anti Social Behaviour)</b>  Some low level crime and anti-social behaviour takes place in the car park, on the street, and under the railway bridges close to Deansgate Station, but it is a generally quiet area unlike outside Deansgate Locks.</p>	<p><b>General Crime and Disorder</b>  <i>To identify aggressive customers to prevent crime and disorder  Awareness of local crime issues in the local area</i></p> <p>We have reviewed the Police.UK hot-spot mapping for the local policing neighbourhood and are aware of the areas of Recorded Crime, Vulnerable People and Vulnerable Places and are very mindful of the potential damage associated with problem gambling. We will make every effort to liaise with local Police over reducing our involvement in any incident.</p> <p>Staff are trained to identify suspicious activity and have the ability to interrogate real-time machine data to identify criminal activity and fraudulent incidents which are logged and escalated where appropriate.</p> <p>All incidents are recorded on the IHL SMART Tablet Incident App inc. crime reference number where applicable.</p> <p>Staff are trained on how to deal with aggressive customers and situations which may also require police assistance.</p> <p>The company operate an internal security alert system and are registered with trade associations for crime bulletins (Bingo Association and BACTA).</p> <p>Machine data is captured in real-time and full secure cash reconciliation is completed on a weekly basis, the machine exceptions are monitored by a centrally based income protection team and all exceptional cash losses are investigated by the internal audit compliance team.</p> <p>Merkur Slots Manchester will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing crime and/or disorder and will engage in the sharing of information with other businesses to support the local community.</p> <p><b>Anti-social behaviour outside the premise</b>  Whilst Public Nuisance is not a Licensing Objective and the Gambling Commission has made clear that 'disorder' means serious disorder, Merkur Slots recognise that public nuisance can escalate in certain circumstances and as a corporate citizen, it has a responsibility to work in partnership with local residents and authorities to reduce environmental impacts.</p> <p>Staff are aware to monitor the outside of the premise and surrounding area for anti-social behaviour and take appropriate steps within reason to minimise the risks. The CCTV monitor on the central desk allows staff to view the exterior at all times.</p> <p>Incidents of anti-social behaviour are recorded on the IHL SMART Tablet Incident App.</p> <p>Staff are trained to be extra vigilant where there is clear evidence of continued anti-social behaviour occurring in the vicinity and encourages a partnership approach with local authorities.</p>
--	---	---

Where short term risk is created by young people congregating nearby or attempting to enter the premise staff are trained to closely monitor the entrance. In extreme cases the maglock system would be deployed.

#### **Money Laundering**

*Failure to identify the occurrence to launder money on our premises (e.g. dyed stained notes, fake notes, foreign coins) and to adhere to reporting policies and procedures.*

Merkur Slots has a designated Anti Money Laundering Officer (AMLO) and AML polices with clear escalation and reporting processes.

There are pawnbrokers and loan shops in the vicinity, staff are trained to monitor and record customer behaviour, spend and time spent gambling and customer interactions are used to assess customer source of funds/income where relevant, enhanced scrutiny will be implemented where concerns of criminal activity or association of are suspected. Any suspicious activities are reported to the nominated officer who will report to NCA where appropriate.

IHL SMART Tablet AML App is used to record AML incidents with emails alerts sent directly to the AMLO.

Security alerts and photos of suspects are shared with other operators. CCTV systems available for additional monitoring of activity and MARS (machine data capture system) provides individual transactions and fraud alerts for suspicious activity.

Anti-fraud analysis on MARS (machine data capture system) identifies suspicious gaming activity.

Adequate staff will always be maintained and subject to regular review and risk assessment.

Merkur Slots, in line with many businesses on the high street will at times operate with a single staff member. Such times when Merkur Slots choose to single man is strictly controlled and are never planned to happen from 8pm until 6am.

In considering when it is appropriate for a venue to operate with one member of staff Merkur Slots will primarily consider the security of the employees by reviewing customer levels, cash control needs and the activity within the local area such as licensed premises closing times.

Any period of single-staffing is managed by the lone-working policy, locked door policy, remote monitoring of CCTV and keeping in touch policy.

Merkur Slots Manchester will operate TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built-in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.

As such staff are based predominately on the venue floor and have very little need to work in a back area, any back-office work is planned when the venue is closed (cash collections) or where customer numbers are low and sufficient staff available.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management who require very limited access due to the TITO and GeWeTe management of cash within the venue.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed. Staffguard provides instant access to live security support and there are panic alarms giving direct contact with the Police.

Venue and machine keys are secured in a time delay safe accessible only by Duty Management.

The premise and staff will be protected by a Staffguard security system, Maglock and intruder alarm will be installed.

Staff are trained to deal with incidents of a criminal nature and aggressive persons. There are support mechanisms available to staff, including counselling and an Employee Assistance Programme.

#### **Alcohol and Drugs**

Anti-social behaviour caused by alcohol is not tolerated within our premises and there are comprehensive security and reporting processes to escalate, report and deal with any issues as they arise.

'No Alcohol Allowed' signage on the door.

Drug misuse is not tolerated within the premise and in locations where there is heightened risk, the toilets are locked with access monitored and controlled by the staff.

Staff are aware to refuse access to any person who is or appears to be under the influence of alcohol or drugs, or adopting anti-social behaviour, any such incident will be logged on the IHL SMART Tablet Incident App and depending on severity will be reported to the police.

Staff are trained to be extra vigilant where there is clear evidence of street drinking in the vicinity and encourages a partnership approach with local authorities.

Maglock systems will be deployed during times of public houses closing.

#### **Money Lending**

Money lending is not tolerated within our premises.

Suspensions of organised money lending by illegal money lenders are escalated to the audit compliance team and onwards to local authority money lending teams.

<p>Ensuring that gambling is conducted in a fair and open way</p>		<p><b>Bingo/Gaming Machine and Supervision</b>  The premise will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of Bingo Tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one. Tablet systems now account for most of the bingo play in venues of all sizes.</p> <p><b>Customer Complaints</b>  <i>Failure to prevent customers complaints and disputes regarding gambling within our premises. Failure to resolve customer's complaints and disputes regarding our gambling premises.</i></p> <p>Merkur Slots operate a clear customer complaints policy both within venues and via a customer complaints link on the website. Complaints management policy in place for written, telephone and complaints received via the 'customer complaints' link on company website.</p> <p>The Company Code of Practice and Complaints and Disputes Policy will be displayed on the Customer Information Board at the entrance with leaflets available within the premise - ADR provider is IBAS.</p> <p>Complaint's portal used to collate and manage responses.  4 stage complaints procedure with ADR entity Independent Betting Adjudication Service Ltd (IBAS) for unresolved complaints. Staff are trained and encouraged to use positive discretion to resolve customer complaints in venue.</p> <p><b>Marketing</b>  Merkur Slots promote responsible gambling and social responsibility throughout all marketing campaigns. Marketing and Promotional activity complies with LCCP and standards set by the Committee of Advertising Practice (CAP) and the Broadcast Committee of Advertising Practice (BCAP).</p> <p>External windows will have digital marketing screens which will display safer gambling messages, No Under 18's allowed, Think 25, Bingo Played Here, opening times and promotional activity.</p> <p>All marketing campaigns are reviewed for appropriateness before being launched. No advertising is used that depicts images that may appeal to children.</p>
---	--	---

<p>Other</p>	<p><b>Places of worship and Religious Buildings</b>                  St Mary's RC Church, 17 Mulberry St, M2 6LN                  Saint Ann's Church, St Ann St, M2 7LF                  Church of Trisha Paytas, 13 Peter St, M2 5QR                  Audacious Church, Trinity Way, M3 7BD                  City Church Manchester, Central Building, Oldham St, M1 1JQ                  Methodist Church, Central Buildings, Oldham St, M1 1JQ                  Anglican Diocese of Manchester, 51 W Mosley St, M2 3HQ                  Cross Street Chapel, Cross St, M2 1NL                  Fourth Church Of Christ Scientist, 42 Peter St, M2 5GP                  The Covenant Nation, 235 Deansgate, Manchester M3 4EN                  Church Of Scientology, 258 Deansgate, M3 4BG                  Manchester Cathedral, Victoria St, M3 1SX                  The Spirit of Life, 90 Deansgate, M3 2GH</p>	<p><b>Ethnicity and Local Area Demographic</b>                  Merkur Slots does not discriminate on the ground of ethnic or social demographic.</p> <p>Local area profiles which detail deprivation, social, ethnic or population may be used as part of the risk assessment in relation to gambling related harm in conjunction with the company standard controls.</p> <p>Merkur Slots takes a holistic approach to customers and is aware that the Equality Act precludes the exclusion of any group for generalised reasons.</p> <p>Merkur Slots will participate with any local/town centre scheme and actively seek to support and be involved with any local initiatives targeted at reducing deprivation (crime/employment/health) and engage in the sharing of information.</p> <p><b>Training &amp; Social Responsibility</b>                  Merkur Slots take responsible gambling and social responsibility seriously, ensuring all staff are fully trained to carry out their roles in a responsible manner.</p> <p>Merkur Slots have attained Responsible Gambling Accreditation from the G4 Global Gambling Guidance Group.</p> <p>Merkur Slots work with YGAM (Young Gamers and Gamblers Education Trust) to deliver City and Guilds accredited training on vulnerable and gambling harm to all levels of management.</p> <p>There are two National Training Centres and a dedicated Learning and Development Team.</p> <p>Bingo Association, Gamcare Accredited training completed by members of management.</p> <p>All staff complete on boarding and 6 monthly refresher training: The Essentials of Compliance, Safeguarding Children and Vulnerable People Age Verification and Customer Interaction.</p> <p>Staff are aware of the importance of social responsibility, trained to advise customers of gambling responsibly and identifying potential problem gamblers.</p> <p>Compliance and Social Responsibility Folder and Player Protection Framework containing policies and procedures is available to all staff. Venue Mangers review compliance logs monthly, Area Managers Bimonthly and Compliance Auditors twice yearly.</p> <p><b>COVID 19</b>                  All staff receive training on COVID-19 guidelines.</p>
--------------	--	---

		<p>Control measures clearly displayed at the entrance, temperature checks prior to entry and hand sanitisers available on entrance and throughout premise.</p> <p>Masks made available to customers.</p> <p>Appropriate social distancing signage throughout the gaming area and maximum capacity limits enforced.</p> <p>COVID-19 Daily Check, B3 Ratio Check and Customer Track and Trace will be recorded on the IHL SMART Tablet.</p>
--	--	---

Merkur Slots Manchester Premise Layout

Premise level:	Merkur Slots Manchester is a ground floor premises with ancillary floors above.
Premise frontage:	Merkur Slots Manchester will be a property will be of a style which obscures the interior with digital Marketing Screens displaying safer gambling messages, no under 18's, opening times. Marketing and promotions will comply with LCCP and standards set by the Committee of Advertising Practice (CAP) and Broadcast Committee of Advertising Practice (BCAP).
Counter Position:	<p>Merkur Slots Manchester floor layout will be of the design to avoid blind spots and enable supervision of entrances and machines from the central service area and staff will regularly patrol the gaming floor to supervise and interact with customers and identify underage or vulnerable persons.</p> <p>The central service area serves as the main support area for staff to manage the venue without having to leave the floor:</p> <ul style="list-style-type: none"> <li>- TiTo machines with a central redemption change machine GeWeTe, the GeWeTe is fitted with a duress code facility and built in time delay. Staff do not carry cash floats and only management can open the gaming machines and change machines.</li> <li>- Beverage and snacks are provided from the service area</li> <li>- IHL SMART Tablet located on the service desk provides the facility to record age verification checks, customer interactions, incidents, self-exclusions, reinstatements, track and trace and general venue management checklists</li> <li>- The CCTV monitor on the central desk allows staff to view the exterior at all times.</li> </ul>
Floor layout:	Merkur Slots Manchester floor layout will be designed to avoid blind spots to enable the active management and observation of customers entering and leaving the premises, from the central service area the entrances, machines and toilet can be observed and staff will regularly patrol the gaming floor and interact with customers allowing identification of underage and vulnerable persons. 'Stay in Control' Posters and Leaflets will be located in prominent locations within the premise.
Machine Positions:	<p>Merkur Slots Manchester will operate under a Bingo Licence, with proprietary bingo equipment, and a range of category B3 (max stake £2/prize £500), C (max stake £1/prize £100) and D (max stake 10p/prize £5) machines (company average stake is 30/40p).</p> <p>Bingo will be available by means of Tablets offering a range of Bingo products and Live calling. Bingo Tablets are linked to Merkur bingo venues and other operators across the country and allow customers to play Bingo including the National Game which is played twice per day in the venue when customer numbers are as low as one.</p>
Hidden Areas:	Merkur Slots Manchester will be fitted with a HD CCTV system with coverage of all public areas including all entry and exits points, CCTV will be clearly advertised to customers with screens visible by employees when working in the service area.

Page 112



Additional Comments

I have worked in the Gaming Industry for 27 years in operations as a venue manager for 4 years and area manager for 20 years before moving to the Audit and Compliance department in 2019, prior to which I was in retail management. During my time in the industry, I have managed venues and areas in many locations from market towns such as Loughborough to large cities like Glasgow and Luton. Local Merkur venues and L&D department will ensure the team in any new locations are fully trained and supported before the opening and during its first trading months.

When I was asked to produce the Local Area Risk Assessment to accompany the License Application for Merkur Slots Manchester, I researched the area, used my knowledge of the area as I had been the Area Manager for the Cashino in Eccles and also am familiar with Merkur venues in Farnworth and Bolton. I then visited the area on 5.8.22 in the daytime before completing my report. The area around the premise was busy with shoppers, tourists and people relaxing in the bars and restaurants.



I additionally made a visit on the evening of Friday 16th September; the entire city Centre was very busy with a George Ezra concert taking place in addition to the usual weekend visitors and those on night outs. The area is very similar to that of several Merkur Slots venues such as Argyle Street - Glasgow, New Street - Birmingham, Cornmarket - Derby where during the daytime it is mainly shoppers, local workers and those out for leisure and then changes to a more vibrant and livelier feel in the evenings and later at night. I am familiar with these type of locations as during my 20 years of working in operations I have been the Area Manager responsible for all these City Centre venues which in my experience are very similar to the Deansgate area. Venues are staffed to appropriate levels to prevent underage access, identify, and act upon indicators of harm or prevent their facilities being used for or in connection with crime.

Merkur has a Lone Worker Risk Assessment and will complete a Security Risk Assessment once a venue has opened and has real experience of trading in the area assessing the results of such an assessment and taking appropriate measures based on findings.

Page 16

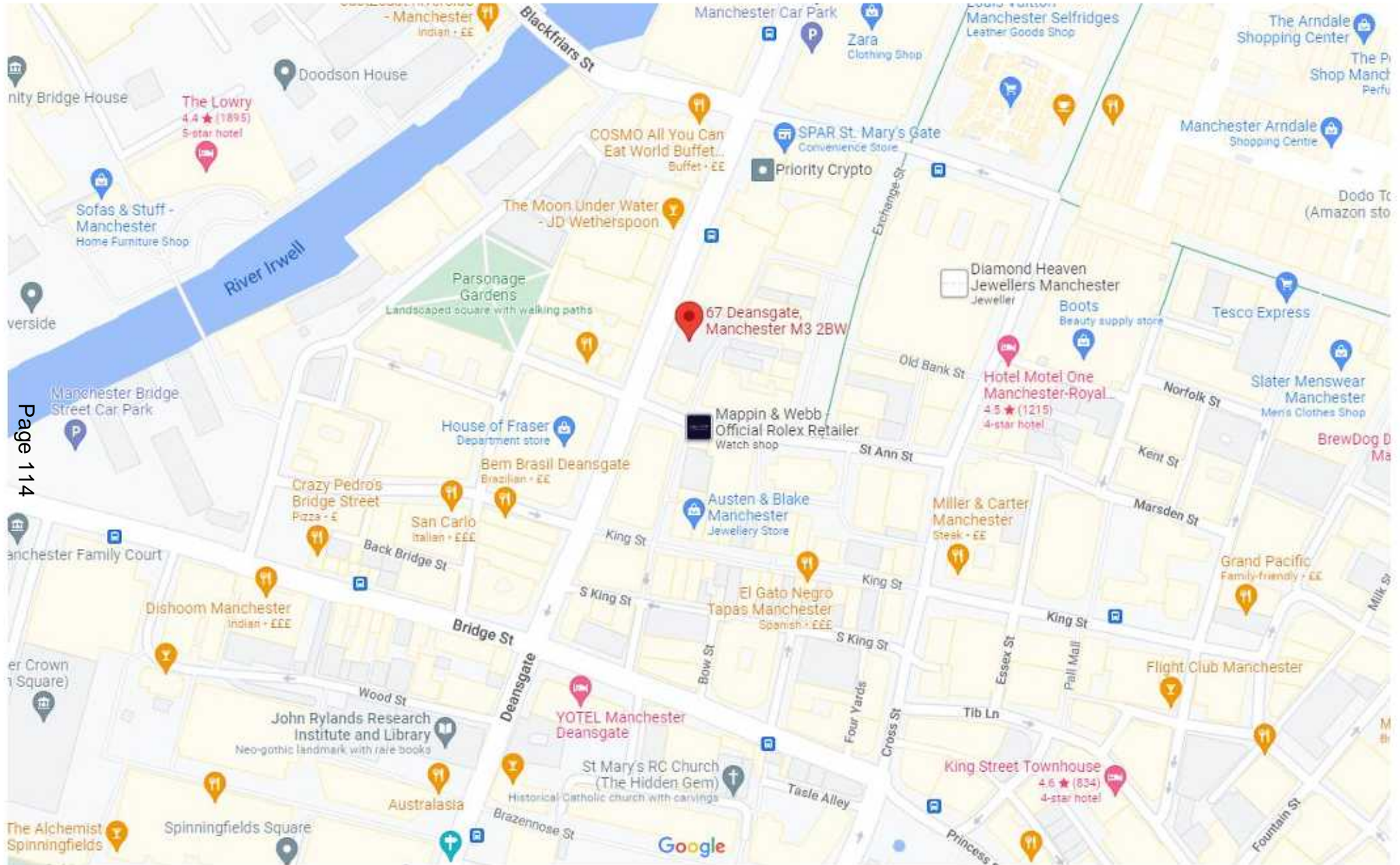
This document provides an assessment of risk at premise level relating to the provision of these facilities for gambling. Merkur Slots is a national operator and employs several standard policies, procedures and control measures across all premises. These issues are clearly articulated in the "Compliance Manual" to be found in the premise and in our Player Protection Framework. The company also carries out premise's security risk assessments (available on request) and health and safety risk assessments which inter alia relate to the objective of keeping crime out of gambling.

Where relevant, Merkur Slots has also considered any substantive local risks identified in a wide range of policy statements related to gambling and local area profiles specifically related to gambling. However, the company does not operate discriminatory policies against any identified groups based on social demographic or ethnic origin. Therefore, identification of issues relating to gambling related harm are based on individual customer behaviour even where particular groups are identified through research at being at greater risk of gambling related harm.

Assessors Name:	
Signature:	
Date:	5.08.2022

Appendix 8, Item 4

# Merkur Slots, 67 Deansgate, Manchester M3 2BW



Merkur Slots, 67 Deansgate, Manchester M3 2BW – Shop frontage example



Page 115

Appendix 8, Item 4



By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

**Manchester City Council  
Report for Resolution**

**Report to:** Licensing Subcommittee Hearing Panel – 30 January 2023

**Subject:** Go Local, 210 Wilmslow Road, Manchester, M14 6LF – App ref: Premises Licence (new) 280605

**Report of:** Director of Planning, Building Control & Licensing

**Summary**

Application for the grant of a premises licence which has attracted objections.

**Recommendations**

That the Panel determine the application.

**Wards Affected:** Fallowfield

<b>Manchester Strategy Outcomes</b>	<b>Summary of the contribution to the strategy</b>
A thriving and sustainable City: supporting a diverse and distinctive economy that creates jobs and opportunities	Licensed premises provide a key role as an employer, in regeneration, and in attracting people to the city. The efficient processing of applications as well as effective decision making in respect of them, plays an essential role in enabling businesses to thrive and maximise contribution to the economy of the region and sub-region.
A highly skilled city: world class and home grown talent sustaining the city's economic success	An effective Licensing regime will enable growth in our City by supporting businesses who promote the Licensing Objectives.
A progressive and equitable city: making a positive contribution by unlocking the potential of our communities	The Licensing process provides for local residents and other interested parties to make representations in relation to licensing applications. Representations have to be directly related to the licensing objectives.
A liveable and low carbon city: a destination of choice to live, visit and work.	An effective licensing system supports and enables growth and employment in our City with neighbourhoods that provide amenities suitable to the surrounding communities.
A connected city: world class infrastructure and connectivity to	

drive growth	
--------------	--

**Full details are in the body of the report, along with any implications for:**

Equal Opportunities Policy  
Risk Management  
Legal Considerations

---

**Financial Consequences – Revenue**

None

**Financial Consequences – Capital**

None

---

**Contact Officers:**

Name: Fraser Swift  
Position: Principal Licensing Officer  
Telephone: 0161 234 1176  
E-mail: [fraser.swift@manchester.gov.uk](mailto:fraser.swift@manchester.gov.uk)

Name: Helen Howden  
Position: Technical Licensing Officer  
Telephone: 0161 234 4294  
E-mail: [premises.licensing@manchester.gov.uk](mailto:premises.licensing@manchester.gov.uk)

---

**Background documents (available for public inspection):**

- Manchester City Council Statement of Licensing Policy 2016 - 2021
- Guidance issued under section 182 of the Licensing Act 2003, April 2017
- Licensing Act 2003 (Hearings) Regulations 2005
- Any further documentary submissions by any party to the hearing



## 1. Introduction

- 1.1 On 06/12/2022, an application for the grant of a Premises Licence under s17 of the Licensing Act 2003 was made in respect of Go Local, 210 Wilmslow Road, Manchester, M14 6LF in the Fallowfield ward of Manchester. A location map and photograph of the premises is attached at **Appendix 1**.
- 1.2 A 28-day public consultation exercise was undertaken in accordance with Licensing Act 2003 regulations; requiring the application to be advertised by the displaying of a blue notice at or on the premises, a notice published in a newspaper or similar circulating in the local area, and details of the application published on the Council's website.
- 1.3 Representations may be made for or against an application during the consultation period. To be 'relevant' and, therefore, able to be taken into account in determining the application, they must be about the likely effect of the grant of the premises licence on the promotion of the licensing objectives. Where representations are made by persons who are not a responsible authority, they must not be frivolous or vexatious.
- 1.4 Relevant representations have been received in respect of this application and so it must be determined by a Licensing Hearing Panel in accordance with the Council's Constitution.

## 2. The Application

- 2.1 A copy of the application is attached at **Appendix 2**.
- 2.2 The applicant is Kwik E Mart MCR Limited.
- 2.3 The description of the premises given by the applicant is:

The premises will be a new convenience store where all types of convenience products will be sold including fresh & frozen food, toiletries, household, newspapers etc. Other services will also be offered to customers such as the ability to pay bills & collect/send packages. Alcohol is not the intended focus of the business there is an expectation that alcohol sales will have a limited impact on the area as local people are expected to on the whole purchase alcohol along with other products.

In terms of addressing the licensing objectives, this premises will be brand new and subject to significant investment which will involve the installation of high spec equipment such as CCTV, electronic refusals register and till prompts. In addition to that, in order to mitigate any risk from the sales of alcohol and its impact on the licensing objectives a number of robust conditions, which reflect the expected policies and procedures to be operated within the business, have been included as part of this application

- 2.4 The proposed designated premises supervisor is:

Nishant Ambalal Talpara

**2.5 The licensable activities applied for:**

**Provision of late night refreshment:**

Mon to Sun 11pm to midnight

The provision of late night refreshment will take place indoors.

**The supply of alcohol for consumption off the premises only:**

Mon to Sun 8am to midnight

**Opening hours:**

Mon to Sun 8am to midnight

2.5.1 In accordance with the Live Music Act 2012 and Deregulation Act 2015, performances of Live Music and Recorded Music between the hours of 0800 and 2300 hours have been deregulated and so should not be regarded as licensable activities for the purposes of this application.

2.5.2 Any further details provided relating to any of the individual licensable activities are specified on the application form at **Appendix 2**.

**2.6 Activities unsuitable for children**

2.6.1 The applicant has not highlighted 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.

**2.7 Steps to promote the licensing objectives**

2.7.1 The applicant proposes to promote the licensing objectives by taking the steps identified in the operating schedule.

2.7.2 These steps must be translated into conditions by the licensing authority to be included in any granted premises licence, unless the conditions are modified by the Panel following consideration of relevant representations. These conditions are set out in the Schedule of Conditions at **Appendix 4**.

**2.8 Further documentation accompanying the application**

2.8.1 No further documents have been submitted by the applicant in support of the application.

**3. Relevant Representations**

3.1 A total of seven relevant representations were received in respect of the application (**Appendix 3**). The personal details of all members of the public have been redacted. Original copies of these representations will be available to the Panel at the hearing.

Responsible Authorities:

- Greater Manchester Police;

- MCC Licensing and Out of Hours Compliance Team;

Other Persons:

- Residents and residents groups x 4
- Business x 1

3.2 Summary of the representations:

Party	Grounds of representation	Recomm - ends
<b>GMP</b>	<p>The premises is close to residential properties, in an area with a large number licensed premises and with one of the largest student populations in Europe.</p> <p>Existing problems of littering, noise disturbance and anti-social behaviour are likely to be exacerbated by a further premises. This will also undermine the hard work of the local Neighbourhood Policing Team.</p> <p>The applicant has not demonstrated how grant of this application will not add to the cumulative issues within the area. MCC's licensing policy states that a genuinely exceptional case would need to be shown. Clear reasons would be expected to be given to demonstrate why the operation of the premises will not add to the cumulative impact already being experienced.</p> <p>GMP have submitted the Licensing Policy Committee – 21 January 2013 in support of their representation (“Review of the Impact of Licensed Premises in Fallowfield – Consultation Analysis”)</p>	Refuse
<b>Licensing and Out of Hours Compliance (LOOH)</b>	<p>The first point made by GPM above is reiterated</p> <p>The application has not addressed the special policy or demonstrated how premises will not add to the cumulative impact already being experienced.</p> <p>The application does not specifically deal with the issues that Fallowfield disproportionately suffers from including preloading with drinks enroute to licensed premises, drunkenness, litter from discarded drinks containers and ASB.</p> <p>The lack of detail in the application raises concerns that the public nuisance and public safety licensing objectives will also be undermined. LOOH raise specific points about issues they would expect to see covered in the operating schedule - staff training, risk assessments, emergency procedures are just some examples.</p>	Refuse
<b>RES 1</b>	<p>The premises currently opens until the early hours and is “Surounded (sic) with students creating problems and making noises”.</p> <p>Concerns are raised that the premises is not well-run, and that “They do not have right system in place”, with concerns</p>	Not stated

	<p>raised about how rubbish is stored and disposed, and that the premises is creating public nuisance.</p>	
<b>RES 2</b>	<p>A long-term resident who lives in very close proximity to the premises, which is also very near to “the late-night New Zealand Wines off licence”</p> <p>The objector describes the area as “now nothing more than a party/club fested, drunken drugged up conurbation, that’s really fit for no human life or existence, becoming one giant noise fest; people to and fro, taxis to and fro, shouting, screeching, hollering, yelling, “music” pumping out ad finitum (sic), from early evening until 6am in the morning.” These issues have led to extreme sleep deprivation. The area also suffers from street begging, and now rat infestation. A further premises is likely to draw more people to the area and will exacerbate these issues.</p> <p>The area is subject to a Designated Public Place Order, likely to be breached far more regularly, creating more work for local police officers.</p> <p>There have been a number of serious widely reported incidents in the area. This objector has personally experienced vandalism to his own property 8 times. One incident, apparently by drunken students, was witnessed on CCTV.</p>	Refuse
<b>RES 3</b>	<p>The area has a “very large transient population including huge numbers of Students in the 19 to 21 year old age group” and has become well known for student house parties and the problems surrounding them (noise, litter and ASB). The area has become a late night hang out, rather than a ‘balanced’ and ‘sustainable’ community. A further premises will add to this.</p> <p>“Students often pre-load before going out for an evening and often buy more alcohol on their way home, fueling (sic) drunken behaviour - littering from takeaway wrappers, cans, bottles, excessive noise eg shouts, screams, singing, sports chants etc”. Residents are at end of their tether. As long term residents choose to leave the area becomes even more transient, anonymous and dangerous with an increase in extremely vulnerable people (ex alcoholics, the homeless, ex offenders etc.)</p> <p>Serious violent crime in the area has increased and is likely to exacerbated. Young people have “a completely false sense of security believing that Fallowfield is ‘a student village’ and that it is an extension of the Owens’ Park Campus”</p> <p>We see no exceptional reason to depart from this policy. This is not a case for compromise.</p>	
<b>RES 4</b>	<p>Comments made that the area has a “massive” student population, that the objection made is the second made for an alcohol licence in the last fortnight, and that further licensed</p>	Refuse

	<p>premises 'undoubtedly' add to existing problems"</p> <p>Details are given of existing nuisance experienced: "Everyday occurrences include broken glass on surrounding pavements, vomit, litter and noise from patrons drinking in outside areas. Noise of patrons going to and from premises also creates a lot of sleep disturbance for residents." The objection comments that "young people make off licences a real 'go to place' for last minute purchases of alcohol for pre drinks social parties, drinking at bus stops as money saving ways of getting in a few drinks before paying bar prices and of course the infamous Fallowfield house parties which cause much distress to many residents."</p> <p>Recent serious violent incidents in the area have been on the national news, with a further stabbing in the past few days, further increasing concerns regarding public safety.</p> <p>There are no exceptional reasons given by the applicant to deviate from the cumulative impact. At all residents' meetings, "residents recount incidents of noise and anti-social behaviour which often relates to the consumption of alcohol in bars and clubs as well as on-street drinking and house partying. This has a terrible effect of many of us and affects our sleep, health and well being. Alcohol is a root cause of many of these problems."</p>	
<b>BUS 1</b>	<p>This representation describes the premises as being in close proximity to students' living accommodation, both on and off campus.</p> <p>Concerns about a likely increase in existing problems of public nuisance in the wider area are reiterated, along with concerns relating to public safety following recent serious incidents including a student having been murdered.</p> <p>The university "is working hard to resolve issues that surround the studentification agenda to promote better community relations. An Off-Campus Student Affairs Officer works hard with other agencies to tackle these issues. A common complaint received from local residents is the problem of anti-social behaviour after students have attended venues. The work that the University has invested in this will be potentially damaged if another outlet within Fallowfield has the capacity to supply alcohol for consumption off the premises until midnight after students will have left other local venues."</p>	<b>Refuse</b>

3.3 No conditions have been proposed by objectors so there are none from objector to include in the Schedule of Conditions at **Appendix 4**.

#### 4. **Key Policies and Considerations**

##### 4.1 **Legal Considerations**

4.1.1 Hearings under the Licensing Act 2003 operate under the Licensing Act 2003 (Hearings) Regulations 2005.

#### 4.2 **New Information**

4.2.1 In accordance with Regulation 18 of the Licensing Act 2003 (Hearings) Regulations 2005, the authority may take into account documentary or other information produced by a party in support of their application, representations or notice either before the hearing or, with the consent of all parties, at the hearing.

#### 4.3 **Hearsay Evidence**

4.3.1 The Panel may accept hearsay evidence and it will be a matter for the Panel to attach what weight to it that they consider appropriate. Hearsay evidence is evidence of something that a witness neither saw nor heard, but has heard or read about.

#### 4.4 **The Secretary of State's Guidance to the Licensing Act 2003**

4.4.1 The Secretary of State's Guidance to the Licensing Act 2003 is provided for all parties involved in licensing. It is a key medium for promoting best practice, ensuring consistent application of licensing powers across England and Wales and for promoting fairness, equal treatment and proportionality.

4.4.2 Section 4 of the 2003 Act provides that, in carrying out its functions, a licensing authority must 'have regard to' guidance issued by the Secretary of State under section 182. The Guidance is therefore binding on all licensing authorities to that extent. However, the Guidance cannot anticipate every possible scenario or set of circumstances that may arise and, as long as licensing authorities have properly understood this Guidance, they may depart from it if they have good reason to do so and can provide full reasons.

4.4.3 Departure from the Guidance could give rise to an appeal or judicial review, and the reasons given will then be a key consideration for the courts when considering the lawfulness and merits of any decision taken.

#### 4.5 **Manchester Statement of Licensing Policy**

4.5.1 Section 4 of the 2003 Act provides that, in carrying out its functions, a licensing authority must 'have regard to' its statement of licensing policy.

4.5.2 The Licensing Policy sets out the vision the licensing authority has for the regulation of licensed premises throughout Manchester and outlines the standards expected in order to ensure the promotion of the licensing objectives in the city. The Panel may depart from the policies should it consider doing so would benefit the promotion of the licensing objectives. Reasons are to be given for any such departure from the Policy.

4.5.3 Section 4 of the Policy (Operation of the Policy) sets out how the Licensing Policy is intended to be used in practice for licence applications and licensed premises.

- 4.5.4 Relevant to this application and the grounds of the representations made, the Panel are recommended to have regard to the following sections of the Policy:

**Section 5: Special Policy Area**

The premises is located within the following special policy area:

Fallowfield and Wilmslow Road

The effect of the Special Policy is that the Council will refuse applications for a new Premises Licence or Club Premises Certificate, or variation of an existing licence or certificate, whenever it receives relevant representation, unless an applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced. In relation to variations, this includes any variation that seeks to add a licensable activity, increase the capacity/size of a licensed premises, or extend the hours for licensable activities, but will usually exclude minor variations.

**Section 6: What we aim to encourage**

This section identifies certain types of venues and initiatives the licensing authority aims to encourage in order to promote an inclusive evening and night-time economy not simply focused on the consumption of alcohol. We aim to encourage:

- Premises that will extend the diversity of entertainment and attract a wider range of participants
- Live music, especially original material, which will provide a range of live performances and styles of music, provided that such entertainment does not undermine the licensing objectives
- National cultural institutions, global sports events and cultural festivals
- Non-drink-led premises, including restaurants, cafes, theatres and cinemas
- Communication and integration with local residents and businesses through licensees consulting with those in the local area prior to an application
- Participation in Pubwatches, off licence forums and other crime-reduction partnerships
- Engagement with the NITENET radio scheme and DISC secure information sharing platform by city centre venues through the Cityco Manchester Business Crime Reduction Partnership
- Designing out crime in the layout of the premises

**Section 7: Local factors**

This section sets out key issues that applicants are expected to take into account relevant to the individual characteristics of the premises when preparing their operating schedule and address any local factors relevant to their premises.

Having regard to the grounds of the representations made, the Panel are recommended to have regard to the following Factors:

- Evidence of pre-existing problems in the area
- Consistency with relevant Council strategies

- The proximity of the premises to local residents and other local businesses, particularly in relation to the potential for nuisance
- Ability to clean and maintain the street scene

### ***Section 8: Manchester's standards to promote the licensing objectives***

This section identifies the standards that the licensing authority expects of licensed premises in Manchester. It is recognised that not all standards will be appropriate to apply in every situation to every premises, and applicants are not obliged to include all standards in their operating schedule. The degree to which standards would be appropriate is expected to be proportionate to the risk posed against the promotion of the licensing objectives having regard to the individual circumstances of the premises. The standards are not exhaustive and the licensing authority will have regard to any relevant issues raised in any representation that may fall outside them.

MS2 Effective general management of the premises

MS5 Prevent on-street consumption of alcohol

MS8 Prevent noise nuisance from the premises

MS10 Operate effective cleansing arrangements, including ensuring the premises and surrounding area are kept clean and free of litter, and adequate arrangements for the secure and responsible storage of refuse

### **Conclusion**

- 4.6 A licensing authority must carry out its functions under this Act ("licensing functions") with a view to promoting the licensing objectives:
- the prevention of crime and disorder
  - public safety;
  - the prevention of public nuisance; and
  - the protection of children from harm.
- 4.7 In considering the matter, the Panel should take into account any representations or objections that have been received from responsible authorities or other persons, and representations made by the applicant or premises user as the case may be. In reaching the decision, regard must also be had to relevant provisions of the national guidance and the Council's licensing policy statement.
- 4.8 Having regard to the representations, the Panel must take such of the steps set out below that it considers appropriate for the promotion of the licensing objectives:
- To grant the licence subject to:
    - the conditions consistent with the operating schedule accompanying the application, which the Panel may modify to such extent as they consider appropriate, and
    - any mandatory conditions that must be included in the licence;
  - To exclude from the scope of the licence any of the licensable activities to which the application relates;
  - To refuse to specify the person proposed in the application as the designated premises supervisor;

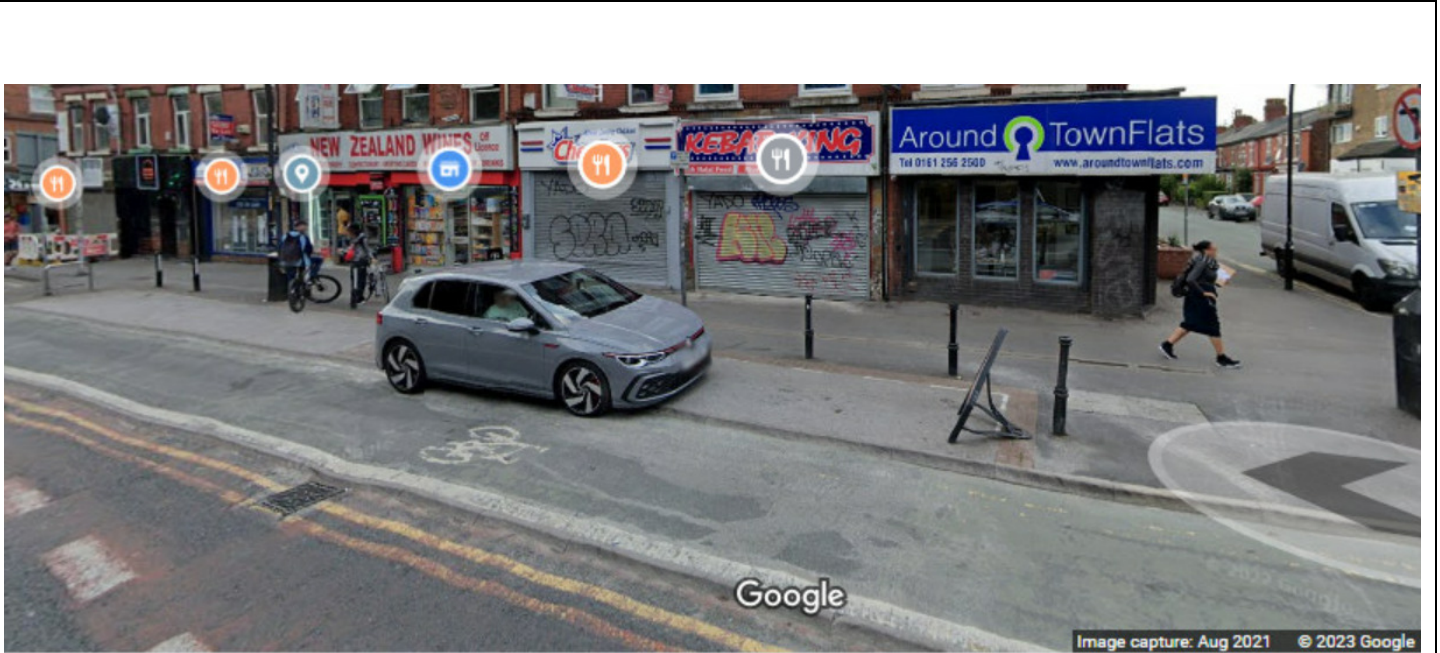


- d) To reject the application.
- 4.9 The conditions consistent with the operating schedule may be modified to alter or omit any of them or to add any new condition, including restricting the times at which licensable activities authorised by the licence can take place.
- 4.10 All licensing determinations should be considered on the individual merits of the application.
- 4.11 The Panel's determination should be evidence-based, justified as being appropriate for the promotion of the licensing objectives and proportionate to what it is intended to achieve. Findings on any issues of fact should be on the balance of probability.
- 4.12 It is important that a licensing authority should give comprehensive reasons for its decisions in anticipation of any appeals. Failure to give adequate reasons could itself give rise to grounds for an appeal.
- 4.13 **The Panel is asked to determine the application.**

This page is intentionally left blank

Go Local  
 210 Wilmslow Road, Manchester, M14 6LF  
 Premises Licensing  
 Manchester City Council

© Crown copyright and database rights 2018. Ordnance Survey100019568.



<b>PREMISE NAME:</b>	Go Local
<b>PREMISE ADDRESS:</b>	210 Wilmslow Road, Manchester, M14 6LF
<b>WARD:</b>	Fallowfield
<b>HEARING DATE:</b>	30/01/2023

This page is intentionally left blank

**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** Kwik E Mart MCR Ltd

*(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			
Go Local 210 Wilmslow Road Fallowfield			
<b>Post town</b>	Manchester	<b>Postcode</b>	M14 6LF
Telephone number at premises (if any)			
Non-domestic rateable value of premises		£11,500	

**Part 2 - Applicant details**

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

- |  |                                     |                             |
|--|-------------------------------------|-----------------------------|
| a) an individual or individuals *                    | <input type="checkbox"/>            | please complete section (A) |
| b) a person other than an individual *               |                                     |                             |
| i as a limited company/limited liability partnership | <input checked="" type="checkbox"/> | please complete section (B) |
| ii as a partnership (other than limited liability)   | <input type="checkbox"/>            | please complete section (B) |
| iii as an unincorporated association or              | <input type="checkbox"/>            | please complete section (B) |
| iv other (for example a statutory corporation)       | <input type="checkbox"/>            | please complete section (B) |
| c) a recognised club                                 | <input type="checkbox"/>            | 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 type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
<b>Surname</b>			<b>First names</b>		
<b>Date of birth</b> I am 18 years old or over				<input type="checkbox"/> Please tick yes	
<b>Nationality</b>					
Current residential address if different from premises address					
Post town				Postcode	
<b>Daytime contact telephone number</b>					
<b>E-mail address (optional)</b>					

**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)	
-----------------------------	------------------------------	-------------------------------	-----------------------------	--------------------------------	--

<b>Surname</b>		<b>First names</b>	
<b>Date of birth</b> over		I am 18 years old or	<input type="checkbox"/> Please tick yes
<b>Nationality</b>			
Current postal address if different from premises address			
Post town		Postcode	
<b>Daytime contact telephone number</b>			
<b>E-mail address (optional)</b>			

**(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 Kwik E Mart MCR Ltd
Address 210 Wilmslow Road Manchester M14 6LF
Registered number (where applicable) 14242575
Description of applicant (for example, partnership, company, unincorporated association etc.)  Limited company
Telephone number (if any)
E-mail address (optional)

**Part 3 Operating Schedule**

When do you want the premises licence to start?

DD	MM	YYYY
04	01	2023

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)

The premises will be a new convenience store where all types of convenience products will be sold including fresh & frozen food, toiletries, household, newspapers etc. Other services will also be offered to customers such as the ability to pay bills & collect/send packages. Alcohol is not the intended focus of the business there is an expectation that alcohol sales will have a limited impact on the area as local people are expected to on the whole purchase alcohol along with other products.

In terms of addressing the licensing objectives, this premises will be brand new and subject to significant investment which will involve the installation of high spec equipment such as CCTV, electronic refusals register and till prompts. In addition to that, in order to mitigate any risk from the sales of alcohol and its impact on the licensing objectives a number of robust conditions, which reflect the expected policies and procedures to be operated within the business, have been included as part of this application.

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)  | <input type="checkbox"/> |
| b) films (if ticking yes, fill in box B)  | <input type="checkbox"/> |
| c) indoor sporting events (if ticking yes, fill in box C)   | <input type="checkbox"/> |
| d) boxing or wrestling entertainment (if ticking yes, fill in box D)  | <input type="checkbox"/> |
| e) live music (if ticking yes, fill in box E)   | <input type="checkbox"/> |
| f) recorded music (if ticking yes, fill in box F)   | <input type="checkbox"/> |
| g) performances of dance (if ticking yes, fill in box G)  | <input type="checkbox"/> |
| h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H) | <input type="checkbox"/> |



**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**

<b>Plays</b> Standard days and timings (please read guidance note 7)			<b><u>Will the performance of a play take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	<b><u>Please give further details here</u></b> (please read guidance note 4)		
Mon					
Tue			<b><u>State any seasonal variations for performing plays</u></b> (please read guidance note 5)		
Wed					
Thur			<b><u>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</u></b> (please read guidance note 6)		
Fri					
Sat					
Sun					

**B**

<b>Films</b> Standard days and timings (please read guidance note 7)			<b>Will the exhibition of films take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
Day	Start	Finish		Both	<input type="checkbox"/>
Mon			<b>Please give further details here</b> (please read guidance note 4)		
Tue			<b>State any seasonal variations for the exhibition of films</b> (please read guidance note 5)		
Wed			<b>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</b> (please read guidance note 6)		
Thur					
Fri					
Sat					
Sun					

C

<b>Indoor sporting events</b> Standard days and timings (please read guidance note 7)			<b><u>Please give further details</u></b> (please read guidance note 4)
Day	Start	Finish	
Mon			
Tue			<b><u>State any seasonal variations for indoor sporting events</u></b> (please read guidance note 5)
Wed			
Thur			<b><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></b> (please read guidance note 6)
Fri			
Sat			
Sun			

**D**

<b>Boxing or wrestling entertainments</b> Standard days and timings (please read guidance note 7)			<b><u>Will the boxing or wrestling entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish			
Mon			<b><u>Please give further details here</u></b> (please read guidance note 4)		
Tue					
Wed			<b><u>State any seasonal variations for boxing or wrestling entertainment</u></b> (please read guidance note 5)		
Thur					
Fri			<b><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></b> (please read guidance note 6)		
Sat					
Sun					

**E**

<b>Live music</b> Standard days and timings (please read guidance note 7)			<b>Will the performance of live music take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
<b>Day</b>	<b>Start</b>	<b>Finish</b>	<b>Please give further details here</b> (please read guidance note 4)		
Mon					
Tue					
			<b>State any seasonal variations for the performance of live music</b> (please read guidance note 5)		
Wed					
Thur					
			<b>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</b> (please read guidance note 6)		
Fri					
Sat					
Sun					

**F**

<b>Recorded music</b> Standard days and timings (please read guidance note 7)			<b><u>Will the playing of recorded music take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
<b>Day</b>	<b>Start</b>	<b>Finish</b>	<b><u>Please give further details here</u></b> (please read guidance note 4)		
Mon					
Tue			<b><u>State any seasonal variations for the playing of recorded music</u></b> (please read guidance note 5)		
Wed					
Thur			<b><u>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</u></b> (please read guidance note 6)		
Fri					
Sat					
Sun					

## G

<b>Performances of dance</b> Standard days and timings (please read guidance note 7)			<b><u>Will the performance of dance take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Mon			<b><u>Please give further details here</u></b> (please read guidance note 4)		
Tue			<b><u>State any seasonal variations for the performance of dance</u></b> (please read guidance note 5)		
Wed			<b><u>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</u></b> (please read guidance note 6)		
Thur					
Fri					
Sat					
Sun					

**H**

<b>Anything of a similar description to that falling within (e), (f) or (g)</b> 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	<b><u>Will this entertainment take place indoors or outdoors or both – please tick</u></b> (please read guidance note 3)	Indoors	<input type="checkbox"/>
Mon				Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Tue			<b><u>Please give further details here</u></b> (please read guidance note 4)		
Wed					
Thur			<b><u>State any seasonal variations for entertainment of a similar description to that falling within (e), (f) or (g)</u></b> (please read guidance note 5)		
Fri					
Sat			<b><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></b> (please read guidance note 6)		
Sun					



## I

<b>Late night refreshment</b> Standard days and timings (please read guidance note 7)			<b>Will the provision of late night refreshment take place indoors or outdoors or both – please tick</b> (please read guidance note 3)	Indoors	<input checked="" type="checkbox"/>
Day	Start	Finish		Outdoors	<input type="checkbox"/>
				Both	<input type="checkbox"/>
Mon	23:00	24:00	<b><u>Please give further details here</u></b> (please read guidance note 4)		
Tue	23:00	24:00			
Wed	23:00	24:00	<b><u>State any seasonal variations for the provision of late night refreshment</u></b> (please read guidance note 5)		
Thur	23:00	24:00	None		
Fri	23:00	24:00	<b><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></b> (please read guidance note 6)		
Sat	23:00	24:00	None		
Sun	23:00	24:00			

**J**

<b>Supply of alcohol</b> Standard days and timings (please read guidance note 7)			<b>Will the supply of alcohol be for consumption – please tick</b> (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	<b>State any seasonal variations for the supply of alcohol</b> (please read guidance note 5)		
Mon	08:00	24:00	None		
Tue	08:00	24:00			
Wed	08:00	24:00			
Thur	08:00	24:00	<b>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</b> (please read guidance note 6)		
			None		
Fri	08:00	24:00			
Sat	08:00	24:00			
Sun	08:00	24:00			

**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 Nishant Ambalal Talpara	
Date of birth [REDACTED]	
Address [REDACTED] [REDACTED]	
Postcode	[REDACTED]
Personal licence number (if known) 9711/1	
Issuing licensing authority (if known) Birmingham City 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

<b>Hours premises are open to the public</b> Standard days and timings (please read guidance note 7)			<p><b>State any seasonal variations</b> (please read guidance note 5)</p> <p>None</p>
Day	Start	Finish	
Mon	08:00	24:00	
Tue	08:00	24:00	
Wed	08:00	24:00	
Thur	08:00	24:00	
			<p><b>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</b> (please read guidance note 6)</p> <p>None</p>
Fri	08:00	24:00	
Sat	08:00	24:00	
Sun	08:00	24:00	

**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)

On first appointment, all staff employed at the premises will receive training on the Licensing Act 2003 including input on preventing underage sales, preventing sales of alcohol to people who are drunk and any other relevant matters. Training shall be regularly refreshed at no less than annual intervals. The training must be recorded and be accessible on the premises and made available for inspection upon request of a Police Officer or an authorised officer of the licensing authority or (in the case of online training) within 48 hours.

**b) The prevention of crime and disorder**

A CCTV system will be in operation at the premises and recorded images shall be retained for a period of 31 days. CCTV images will be provided to the police and other responsible authorities as soon as practicable and in any case within 48 hours of a request for such images, subject of the provisions of the DPA.

**c) Public safety**

An incident register will be maintained at the premises and made available to the authorities on request.

**d) The prevention of public nuisance**

A register of refusals of alcohol will be maintained at the premises. The register will be made available for inspection by the Police and other responsible authority

**e) The protection of children from harm**

The premises will adopt a 'Challenge 25' policy. This means that if a customer purchasing alcohol appears to be under the age of 25, they will be asked for proof of their age, to prove that they are 18 years or older.

Posters will be on display advising customers of the 'Challenge 25' policy.

The only forms of identification that will be accepted will bear their photograph, date of birth and a holographic mark and/or ultraviolet feature. Examples of appropriate identification include a passport, photocard driving licence, military ID, and Home Office approved proof of age ID card bearing the PASS hologram.

**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 (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.**

<b>Declaration</b>	<ul style="list-style-type: none"> <li>• [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 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).</li> <li>• 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</li> </ul>
--------------------	---

	work relating to a licesable activity) and I have seen a copy of his or her proof of entitlement to work, if appropriate (please see note 15)
Signature	[REDACTED]
Date	05.12.22
Capacity	[REDACTED]

**For joint applications, signature of 2<sup>nd</sup> applicant or 2<sup>nd</sup> 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	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 14)			
[REDACTED]			
[REDACTED]			
Post town	[REDACTED]	Postcode	[REDACTED]
Telephone number (if any)	[REDACTED]		
If you would prefer us to correspond with you by e-mail, your e-mail address (optional)			
[REDACTED]			

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank



**From:** Alan Isherwood <Alan.Isherwood@gmp.police.uk>

**Sent:** 04 January 2023 08:24

**To:** [REDACTED]

**Cc:** Central Licensing <CentralLicensing@gmp.police.uk>

**Subject:** RE: OBJECTION FROM GMP - LPA 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF

Hi [REDACTED]

We will refer to the document 'Review of the Impact of Licensed Premises in Fallowfield – Consultation Analysis' which is the evidence used by MCC when the decision was made to implement the Special Policy. I have attached a copy of this document.

Kind Regards

Alan

**From:** [REDACTED]

**Sent:** 03 January 2023 09:20

**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>; [REDACTED]

[REDACTED]

**Cc:** alan.isherwood <alan.isherwood@gmp.police.uk>; GMP Licensing <centrallicensing@gmp.police.uk>

**Subject:** RE: OBJECTION FROM GMP - LPA 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF

Hi Alan,

Thanks for your rep.

Could you please provide me with the evidence the police will be relying on to support their objection?

Thanks,

[REDACTED]

**From:** Premises Licensing <Premises.Licensing@manchester.gov.uk>

**Sent:** 02 January 2023 22:59

**To:** [REDACTED]

**Cc:** alan.isherwood <alan.isherwood@gmp.police.uk>; GMP Licensing <centrallicensing@gmp.police.uk>

**Subject:** OBJECTION FROM GMP - LPA 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF

Dear [REDACTED]

Please find attached a representation as above. I've copied PC Isherwood who submitted the representation in on this email.

Kind regards, [REDACTED]

Premises Licensing  
Growth and Development  
Manchester City Council  
Level 1 Town Hall Extension

**Manchester City Council  
Report for Resolution**

**Report to:** Licensing Policy Committee – 21 January 2013

**Subject:** Review of the Impact of Licensed Premises in Fallowfield – Consultation Analysis

**Report of:** The Strategic Director of Neighbourhood Services

---

**Purpose of Report**

This report presents the Committee with the results of the public consultation on proposed special policies in areas of Fallowfield, Old Moat, Withington and Levenshulme wards, and requests the Committee to consider whether any such special policies should be recommended to Full Council to be adopted.

**Recommendations**

The Committee is asked to:

1. Consider the proposed policy approaches detailed in Section 7 of this report and determine the special policy as set out in Appendix 8, subject to any amendments considered appropriate for the promotion of the licensing objectives by the Committee.
  2. Incorporate within the special policy the considerations and reasons of the Committee in reaching its decision in accordance with (1) above.
  3. Recommend to Council that they adopt the special policy, as determined by the Policy Committee in accordance with (1) and (2) above, for incorporation within the Council's Statement of Licensing Policy.
  4. Request that the following areas of land are proposed for inclusion within the special policy area as part of the next review of Licensing Policy:
    - a) The undeveloped land at corner of Egerton Road and Clifton Avenue.
    - b) The land at the rear of the Ram and Shackle including the Ram Lodge.
  5. Request officers to undertake an annual review of levels of alcohol-related crime, general crime and antisocial behaviour, in both the special policy area and Withington.
- 

**Wards Affected: Fallowfield, Withington, Old Moat, Levenshulme**

Community Strategy Spine	Summary of the contribution to the strategy
Performance of the economy of the region and sub region	Licensed premises provide a key role as an employer, in regeneration, and in attracting people to the city. The proposed Special Licensing Policy will play an essential role in establishing that only such premises that are able to demonstrate that they shall not add to existing cumulative impact shall be licensed in the special policy areas, which will positively contribution to the economy of the region and sub-region.
Reaching full potential in education and employment	Licensed premises offer employment and training opportunities for local people, particularly those who are young.
Individual and collective self esteem – mutual respect	
Neighbourhoods of Choice	The proposed Special Licensing Policy will play an essential role in establishing only those premises that are able to demonstrate that they shall not add to existing cumulative impact shall be licensed in the affected areas, thereby ensuring the promotion of the licensing objectives, namely the prevention of crime and disorder, the prevention of public nuisance, public safety, and the protection of children from harm .

**Full details are in the body of the report, along with any implications for:**

- Equal Opportunities Policy
- Risk Management
- Legal Considerations

---

**Financial Consequences – Revenue**

None

**Financial Consequences – Capital**

None

---

### Contact Officers:

Name: Jenette Hicks  
Position: Licensing Unit Manager  
Telephone: 0161 234 4962  
E-mail: [j.hicks1@manchester.gov.uk](mailto:j.hicks1@manchester.gov.uk)

Name: Fraser Swift  
Position: Principal Licensing Officer  
Telephone: 0161 234 1176  
E-mail: [f.swift@manchester.gov.uk](mailto:f.swift@manchester.gov.uk)

### Background documents

The following documents disclose important facts on which the report is based and have been relied upon in preparing the report. Copies of the background documents are available up to 4 years after the date of the meeting. If you would like a copy please contact one of the contact officers above.

The Licensing Act 2003 Amended Guidance issued under Section 182 of the Licensing Act 2003, October 2012  
Review of the Impact of Licensed Premises in Fallowfield and Withington, Licensing Policy Committee, 19 March 2012  
Original Response documents to the Public Consultation

#### 1 Introduction

- 1.1 On 19 March 2012, the Licensing Policy Committee considered a report entitled 'Review of the Impact of Licensed Premises in Fallowfield and Withington' detailing evidence of crime and disorder and nuisance in certain areas of Fallowfield, Withington and Wilmslow Road.
- 1.2 The Committee requested that officers consult on a proposed amendment to the Council's Statement of Licensing Policy, namely that a special policy is adopted that would create a presumption that in three distinct areas identified as 'Fallowfield', 'Withington' and 'Wilmslow Road' (as shown in the consultation response document at Appendix 1), applications for new premises licences, club premises certificates or variations to those authorisations would normally be refused, following relevant representations, unless the applicant can demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives.
- 1.3 The consultation sought views on the proposed special policy for the areas of Fallowfield, Withington and Wilmslow Road, including:
  - Whether there should be a special policy for the identified areas
  - The boundary of any areas for which a special policy should have effect
  - The extent of the special policy in any such areas
- 1.4 The consultation lasted 12 weeks between 1 June and 24 August. Consultation documents (at Appendix 1) were sent to all holders of premises licences and club premises certificates within the boundaries of the proposed areas, local resident associations, Ward Members, trade representatives. The

consultation documents were also made available online at the Public Consultations page of the Council's website and an online response facility was also made available. A representative of the Licensing Unit attended local residents and Pubwatch meetings to raise awareness of the proposed policy and the consultation.

## 2 Responses to the Consultation

- 2.1 A total of 73 responses were received during the consultation period. No responses were received out of time.
- 2.2 The majority (68%) of respondents were local residents with a total of 50 responses.
- 2.3 Only 2 responses (3%) were received from the licensed trade, both from [REDACTED], from McDonalds – an individual response and one on behalf of McDonalds, Nandos, and Subway.
- 2.4 'Other' respondents consisted of Greater Manchester Police, South Manchester Regeneration Team, Public Health Manchester, University of Manchester Residential Services, University of Manchester Students' Union, Corridor Manchester, Manchester Metropolitan University, the Student Safety Tactical Partnership.
- 2.5 Responses were received as below:

Respondent Type	Total	Percentage
Local Resident	50	68%
Ward Councillor	6	8%
Residents Association	4	5%
Local Business (licensed)	2	3%
Local Business (not licensed)	1	1%
Other	8	11%
Local Resident & Local Residents Association	1	1%
Local Resident & Local Business	1	1%
Total	73	100%

- 2.6 Summary details of all responses are attached at Appendix 2. Some responses did not answer the consultation questions as specifically posed, but where an answer to a consultation question could properly be inferred from their response, it has been recorded as though it were a direct response. Where no answer could properly be inferred, it was recorded as 'Not stated'.
- 2.7 Appendix 3 contains details of the actual responses received to the consultation. The original responses shall be made available at the Committee hearing.
- 2.8 The responses in respect of each individual area are considered in more detail below. Proposals how to address issues arising out of those responses are detailed in section 7.

**3 Fallowfield**

- 3.1 Detailed below are the responses to the questions proposed in the consultation in respect of the defined 'Fallowfield' area.

<b>Q1. Do you consider that a special policy should be adopted in respect of the cumulative impact of licensed premises within the identified area of Fallowfield?</b>		
	Number of Responses	Percentage of responses
Yes	69	95%
No	3	4%
Not stated	1	1%

- 3.2 Clearly, there is overwhelming support for a special policy in Fallowfield, with 95% of respondents agreeing that it should implemented. Reasons given commonly refer to the increase in problems over the years associated with licensed premises, such as vandalism, noise nuisance, and litter.

***“The steady growth in the number of licensed premises and the relentless extension of their licensing hours during the last 9 years has led to a significant increase in noise nuisance, vandalism, and alcohol induced anti-social behaviour which has severely affected local residents and blighted our local environment.”***

**(Resident)**

***“There are already many bars in the area. Drinkers leaving these bars affect the residents with night time noise, antisocial behaviour - eg, tipping bins over, etc.”***

**(Resident)**

***“I have lived in Fallowfield for 37 years and since 24hr licensing has come into force there is a much greater amount of disturbance at night from drunken people leaving bars at 3,4 and 5am in the morning. The proliferation of bars has also led to an increase in rubbish accumulation of bottles and cans in the street. The disturbances and nuisances occur through the week and are not confined to the weekend drinking.”***

**(Resident)**

- 3.3 The 3 responses that did not consider a special policy should be adopted were the 2 licensed trade responses (McDonalds, Mcdonalds / Nandos / Subway), and the University of Manchester Students Union.
- 3.4 In giving the reasons for their responses, McDonalds and Mcdonalds / Nandos / Subway, only make reference to their objections being in relation to the special policy incorporating late night refreshment.

***“The adoption of a cumulative impact policy which restricts the operating hours of hot-food premises would be a disproportionate***

**response. This will negatively impact on local businesses whilst doing little to tackle the problems arising from existing premises.”**

**(McDonalds)**

- 3.5 The response from the Students Union considers that the policy would be detrimental to the local economy and disputes the policy would have any positive impact on the local issues identified in the original report considered by the committee.

**“As the policy would only affect licensees wishing to enter the area, and not those who are already trading (apart from the refusal of amendments to pre-existing licenses), encouragement of Best Practice would be lost and a competitive market that encourages best practice would essentially be closed to new (and potentially more responsible) traders. The policy would not help residents who are already being affected by the cumulative effect of licensed trade within Fallowfield and Withington. As this policy by-passes restriction on licensed trade to those already trading, then issues of noise and anti-social behaviour already being felt are not tackled.”**

**(Students Union)**

<b>Q2. Do you agree with the boundary of the area "Fallowfield" being subject to a special policy?</b>		
	<b>Number of Responses</b>	<b>Percentage of responses</b>
Yes	62	85%
No	5	7%
Not stated	5	7%
Neutral	1	1%

- 3.6 The vast majority (62/73) stated in their responses that they agreed with the proposed boundary although 12 actually proposed changes to the boundary.
- 3.7 3 were for the Fallowfield Campus to be included. Where given, the reasons for doing so by both were ‘for completeness’.
- 3.8 6 respondents proposed that the currently undeveloped land at the corner of Egerton Road and Clifton Avenue be included (Note: this same section of land is often referred to the ‘St John’s site’ as it was a former St John’s Ambulance base. It has also been included in another 7 responses for within the policy boundary for ‘Wilmslow Road’)
- 3.9 A photograph showing this proposed land is included at Appendix 5.

Where given, the reason for including this area is in because of the potential for development of the land with licensed premises.



***“However, I would welcome the inclusion of the St. John site, since any undeveloped land could be used in the future to sell alcohol.”***

**(Resident)**

<b>Q3. Do you consider that this (policy) approach in 'Fallowfield' is:</b>		
	<b>Number of Responses</b>	<b>Percentage of responses*</b>
Not required at all	1	1%
Too restrictive	2	3%
Just right	66	90%
Not stated	4	5%
* Due to the rounding of numbers when calculating as percentages, the total only tallies 99%		

- 3.10 90% of respondents felt that the proposed policy approach in Fallowfield was 'just right'. Reasons commonly given were that it was due to there being already too many late night licensed premises:

***“The Fallowfield districted reached saturation point some time ago, focus may now be shifted to quality establishments.”***

**(Fallowfield Councillor)**

***“This policy is long overdue. Fallowfield centre is already over saturated with licensed hours in licensed premises and just cannot be allowed to develop further in this direction. This policy will help to stop the problems linked to this situation getting worse.”***

**(Resident)**

***“The area would become even more problematic if more licensed premises were allowed to open or extend their hours, so this policy is very much needed.”***

**(Greater Manchester Police)**

- 3.11 However, it was recognised by some respondents that exceptions to the policy could be appropriate in certain circumstances:

***“I would welcome any new businesses, including bars, that won't have a negative impact on the area. If they can't demonstrate that they won't, then I don't want them here.”***

**(Resident)**

***“there needs to be more variety in provision in this area, to dilute the anti social behaviour that arises from mono-culture. Restricting more very similar licences will make it less likely that worse behaviour ensues.”***

**(Resident)**

- 3.12 Alternatively, the Students Union considered the special policy as 'not required at all':

**“...the Students’ Union is not convinced that the policy proposed will affect the areas identified in any concrete way – until the policy is amended to be of more public benefit, it remains unclear that there is any need for this policy at all. Amendment could change the Students’ Union’s position on this.”**

**(Students Union)**

- 3.13 Additionally, McDonalds considered the policy as ‘too restrictive’ in respect of it incorporating late night refreshment:

**“The adoption of a special policy which covers hot food premises will limit the ability of local businesses to expand to meet demand at a time when authorities, at all levels, should be doing everything they can to encourage businesses to grow.”**

**(McDonalds)**

<b>Q4. Do you consider that there should be amendments to the special policy for 'Fallowfield'?</b>		
	<b>Number of Responses</b>	<b>Percentage of responses</b>
Yes	44	60%
No	25	34%
Not stated	4	5%

- 3.14 Of the 44 responses stating that there should be amendment to the policy, 36 (82%) proposed that Temporary Event Notices shall also be captured under the special policy. However, Temporary Event Notices cannot be incorporated within a Cumulative Impact Policy. The s182 Guidance states (my emphasis):

**13.29 “The effect of adopting a special policy of this kind is to create a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates which are likely to add to the existing cumulative impact will normally be refused or subject to certain limitations, following relevant representations, unless the applicant can demonstrate in the operating schedule that there will be no negative cumulative impact on one or more of the licensing objectives.”**

- 3.15 By its nature, “cumulative impact” relates to the effect of a concentration of many premises (Guidance 13.36). Temporary Event Notices are unlikely to cause a cumulative, ongoing impact due to the fact that they are time-limited one-off events, restricted in number and so unlikely to create a ‘cumulative’ ongoing effect.
- 3.16 2 responses proposed that the policy should incorporate a review of all existing licensed premises within the area. However, a special policy cannot have such an effect and so this proposal cannot be considered. The s182 Guidance states:

**“13.36...The “cumulative impact” on the promotion of the licensing objectives of a concentration of multiple licensed premises should only give rise to a relevant representation when an application for the grant or variation of a licence or certificate is being considered. A review must relate specifically to individual premises, and by its nature, “cumulative impact” relates to the effect of a concentration of many premises. Identifying individual premises in the context of a review would inevitably be arbitrary.”**

3.17 1 response failed to state their proposed amendment.

3.18 2 answers were repeated references to suggested boundary changes they had addressed in Question 3. 2 responses (Mcdonalds, Mcdonalds / Nandos / Subway) proposed that Late Night Refreshment should not be included, and the Students Union proposed that the policy should incorporate an annual review mechanism and weight to be given to proposed operators incorporating best practice and corporate responsibility schemes:

***“1) An annual report should be incorporated into the review process outlining the effectiveness of the proposed policy.***

***2) The review of the policy should be set annually to ensure its responsiveness to turbulent market conditions.***

***3) The review of the policy should incorporate consultation with public stakeholders to ensure its accountability, and that is working to solve the issues that it is intended for.***

***4) Weight for new representations for licensing, which is still allowable within the policy, should be given to businesses that propose abidance to best practice and social corporate responsibility schemes.”***

**(Students Union)**

3.19 In relation to the recommendation (1) by the Students Union, 13.31 of the s182 Guidance advises:

**“Once adopted, special policies should be reviewed regularly to assess whether they are needed any longer or if those which are contained in the special policy should be amended.”**

3.20 Therefore, a review of the effectiveness of any special policy should be incorporated consistent with the Guidance and Members may wish to consider the review frequency of any special policy imposed.

**4 Withington**

- 4.1 Detailed below are the responses to the questions proposed in the consultation in respect of the defined 'Withington' area.

<b>Q5. Do you consider that a special policy should be adopted in respect of the cumulative impact of licensed premises within the identified area of Withington?</b>		
	Number of Responses	Percentage of responses
Yes	68	93%
No	4*	5%
Not stated	1	1%

- 4.2 It is possible that one of the four 'No' responses was made in error as it is inconsistent with the remainder of the response which indicated support for a policy (Response no. 44 from [REDACTED]), however even if it was not made in error it would not significantly affect the above percentages.
- 4.3 93% of respondents agree with a special policy being implemented in Withington. Reasons given included the number of existing premises in Withington, as well as the potential of Withington 'becoming like' Fallowfield:

***"Withington has too many bars and pubs in a small area. This causes us residents problems on our streets."***

**(Resident)**

***"Without a CIP which includes Withington, there is a real danger that the problems currently generated in Fallowfield could migrate south along Wilmslow Road to Withington. Also, existing licensed premises could seek extended hours: increasing existing problems in adjacent streets."***

**(Resident)**

***"Withington and Fallowfield are closely linked. Withington already has a number of late night drinking licenses and approaches made to me as a Ward Councillor in recent years from some bar owners indicate that late licenses will be retained and could easily be expanded to longer opening hours if a cumulative impact policy is not in place for Withington, particularly if cumulative impact policies are in place for the other parts of the Fallowfield, Wilmslow Road, Withington corridor."***

***Withington Village serves a well developed residential area which includes flats and houses in the Village centre itself and a concentration of drinking and drinking related establishments with late hours in Withington would add to the frequent problems of anti-social noise nuisance, vandalism, damage, litter, waste and other nuisance already reported by local residents in this area through the Withington Civic Society, which I regularly attend, and through individual cases."***

**(Withington Ward Councillor)**

- 4.4 21 of those in support of the policy gave no reason for why they considered it should be adopted. Several responses either referred to their earlier reasons for Fallowfield being subject to the policy or gave identical reasons.
- 4.5 Although there was general support for a policy, some responses acknowledged that the level of problems in Withington was not as severe as experienced in Fallowfield.

***“As for Fallowfield, altho' because there are not the 'halls' in Withington, I think the problem is not quite so bad.”***

**(Resident)**

***“As for Fallowfield, this is essentially a residential area. At the moment, though I think the degree of licensed premises in Withington isn't an issue but if a policy is implemented in Fallowfield, without one in Withington, that could change.”***

**(Anonymous)**

- 4.6 The 3 against (aside from [REDACTED]) are the same as per Fallowfield i.e. McDonalds, Mcdonalds / Nandos / Subway, and the Students Union. The reasons being the same as they gave against the policy proposal for Fallowfield, as detailed earlier in the report.

<b>Q6. Do you agree with the boundary of the area 'Withington' being subject to a special policy?</b>		
	Number of Responses	Percentage of responses
Yes	61	84%
No	7	10%
Not stated	4	5%
Neutral	1	1%

- 4.7 84% agree with the proposed boundary. The response from McDonalds was recorded as 'neutral'. The joint response from Mcdonalds / Nandos / Subway did not state an opinion on this point. The Students Union was the only respondent against a policy in this area to state that they did not agree with the boundary:

***“Due to the far lower amount of licensed activities within the boundaries marked as 'Withington' and the area marked as 'Wilmslow Road', it is unclear what the local authority believe to be a defined saturation point, or indeed, when cumulative impact becomes problematic: either only the main Fallowfield area should be regulated, due to its high amount of licensed trade, or all boundaries should be dealt with as one entity.”***

**(Students Union)**

- 4.8 There were 6 respondents who wish to see a special policy implemented for Withington but disagree with the proposed boundary, although 1 of these responses refers to the undeveloped land in Fallowfield, and so is included in relation to the Fallowfield boundary instead. Therefore, it is considered that there are 5 actual proposed amendments. All propose the extension of the boundary southwards to include extra licensed premises within the boundary:

***“The area identified does take in the bulk of licensed premises in the area but not all as there are some to the south of the current border as far as Cotton Lane.”***

**(Residential Services, University of Manchester)**

***“I would take the boundary down as far as the Christie site to include Red Lion and rank of shops opposite. I suspect some of these are struggling to survive and could be replaced by off-licences.”***

**(Resident)**

<b>Q7. Do you consider that this (policy) approach in 'Withington' is:</b>		
	<b>Number of Responses</b>	<b>Percentage of responses</b>
Not required at all	1	1%
Too restrictive	8	11%
Just right	61	84%
Not stated	3	4%

- 4.9 84% consider the policy approach as just right. The reasoning is typically that the policy would act as a preventative measure:

***“There are already several bars in Withington. I have seen the negative effects that increasing the numbers of drinking places has had in Fallowfield - on the community etc and would not like Withington to suffer in the same way.”***

**(Resident)**

***“At the moment, the mix of licensed premises to other premises in the village centre is right for the health of the centre as a mixed provision for the people of Withington as a whole. Increasing the number of licensed premises will unbalance the centre and change its character, reducing the attractiveness of Withington as a place to live and work.”***

**(Resident)**

***“It is vital that alcohol related problems do not accumulate rapidly in this area - which is likely to happen without a cumulative impact policy.”***

**(Withington Councillor)**

- 4.10 The Students Union state they consider that the proposed policy approach is not required at all and have regard to the lower levels of licensed premises and related problems in the area.

- 4.11 Of the 8 who consider the approach 'too restrictive', it is possible one response (no. 44) is made in error as the reasons are not consistent with the answer. The 2 responses from Mcdonalds and Mcdonalds / Nandos / Subway also consider the approach too restrictive, in respect of its inclusion of late night refreshment, for the same reasons given as for Fallowfield:

***"It would have a disproportionate economic impact on our businesses. The adoption of a special policy which covers hot food premises will limit the ability of local businesses to expand to meet demand at a time when authorities, at all levels, should be doing everything they can to encourage businesses to grow. We want to do everything we can to ensure the impact we have on the local community is positive. We are enthusiastic about the idea of working with the local community to try to find a workable solution, rather than increasing regulation on local business."***

**(Mcdonalds / Nandos / Subway)**

- 4.12 However, there are 5 persons who consider the approach as 'too restrictive' but that are also in favour of a special policy for Withington:

***"Withington is struggling as a viable, attractive district centre and so, whilst a CIP is essential, it should not be so restrictive as to deter an entrepreneur who wanted to open, e.g. a restaurant. Therefore, any new applications should be considered on their merits, but with an 11pm finish in all cases."***

**(Resident)**

***"Marginally too restrictive. But I would support it so long as there were no escalation of restrictions. I would for example support new license (sic) applications for licensed restaurants and also perhaps for small venues in this District Centre. I would not support any arbitrary curfew either for proposed new premises or for reviews or variation requests. That could kill this Village which would benefit from development of a balanced, food-led, live entertainment-enhanced night time economy. A1 and A2 retail could even move into Copson Street to allow the High Street to develop a nice evening bustle cf Burton Road, cf Chorlton. Withington High Street has arguably suffered by a moratorium on hot food takeaway licences and more generally the old A3 class."***

**(Withington Ward Councillor)**

***"I am concerned that a blanket policy will discourage regeneration within the Withington District Centre. Could I suggest that new licence applications within the area be considered on their merits bearing in mind their location (whether on Wilmslow Rd or a side street of Wilmslow Rd), the size of the premises applying, its proposed use (pub, bar, restaurant, cafe-bar, takeaway, off-licence) and its hours of operation."***

**(Withington Ward Councillor)**

***“We are concerned that a blanket policy may discourage regeneration within the Withington District Centre. We suggest that any new applications within the area should be considered on their merit with a presumption of an 11pm deadline should a licence be granted. Should a change of ownership occur in a premises which currently has a licence later than 11pm we would want the licence reviewed with a presumption that it would be rolled back to 11pm at that point.”***

**(Withington Civic Society)**

***“I am concerned that a blanket policy may discourage regeneration within the Withington District Centre and suggest that any new applications within the area should be considered on their merit bearing in mind the following factors: location (whether on Wilmslow Road or one of the side streets), size of premises, proposed use (pub, bar, restaurant, cafe, takeaway, off-licence) and hours of operation.”***

**(Old Moat Ward Councillor)**

- 4.13 Most of those responses that recommended a different approach (to the one originally proposed in the consultation) seek to include flexibility within the policy to enable ‘desirable’ operations according to their respective merits. Therefore, there is appetite within some for further licensed premises to be permitted in Withington subject to limitations.
- 4.14 Most of the respondents who consider the approach for Withington as ‘too restrictive’ and wish to see more scope available are persons / organisations with a special interest to Withington i.e. Withington councillors, Withington Civic Society although there are also a similar number of other Withington residents and a Withington Councillor who consider that the policy as originally proposed is ‘just right’.
- 4.15 A terminal hour of 11pm is proposed for new licences by a Withington residents and the Withington Civic Society. A licensing policy can incorporate an approach regarding licensed hours and the strategy it considers appropriate for the promotion of the licensing objectives in its area. In determining appropriate strategies around licensed opening hours, licensing authorities cannot seek to restrict the activities of licensed premises where it is not appropriate for the promotion of the licensing objectives in doing so.
- 4.16 However, there is no reason given by the Withington Civic Society why 11pm should be imposed on all new licences or why that time would be appropriate for the promotion of the licensing objectives. Additionally, it is not possible to review all existing licences or to ‘roll back’ hours to 11pm upon the transfer of a licence, as also proposed in their response.



<b>Q8. Do you consider that there should be amendments to the special policy for 'Withington'?</b>		
	Number of Responses	Percentage of responses
Yes	46	63%
No	24	33%
Not stated	3	4%

- 4.17 The majority of responses (63%) did seek amendments to the special policy; the most popular of which was the inclusion of Temporary Event Notices within the ambit of the policy, which was requested in 39 responses (representing 85% of the 63 who wished to see changes).
- 4.18 Again, changes were requested by the Students Union (review of the effectiveness of the policy) and McDonalds, Mcdonalds / Nandos / Subway (late night refreshment to be excluded), as per Fallowfield.
- 4.19 The remaining changes repeated proposals already covered in Q7 such as incorporating a standard terminal hour of 11pm, and considering cases according to their specific merits.

**5 Wilmslow Road**

- 5.1 Detailed below are the responses to the questions proposed in the consultation in respect of the defined 'Wilmslow Road' area.

<b>Q9. Do you consider that a special policy should be adopted in respect of the cumulative impact of licensed premises within the identified area of Wilmslow Road?</b>		
	Number of Responses	Percentage of responses
Yes	68	93%
No	3	4%
Not stated	2	3%

- 5.2 All respondents with the exception of 2 local residents stated an answer, with all responses in favour a special policy for this area, except for the Student Union and Mcdonalds, Mcdonalds / Nandos / Subway. The objections were broadly on the same basis as per Fallowfield and Withington.
- 5.3 Reasons given by those in favour of the policy commonly referred to the problems experienced in Fallowfield and Withington, as well as issues directly related to the proposed area:

***"This stretch of Wilmslow Road is densely populated on either side of the proposed zone and links up the 2 other areas of Fallowfield and Withington."***

**(Greater Manchester Police)**

***"This area has a lot of noisy activity especially on Friday and Sat. nights from students who are drinking, moving from Fallowfield pubs to their houses. Although there are not many shops and pubs in this stretch some of the properties could be converted into clubs if restrictions on development in Fallowfield and Withington took effect."***

**(Resident)**

***"The licensed premises in this area to impact on our daily lives, especially the Ram and Shackle. The constraints of a CIP therefore do need to be applied here as well as in Fallowfield."***

**(Resident)**

***"Over recent years I have received many complaints from Old Moat ward residents about the problems of noise and anti-social behaviour that are caused by the patrons of the bars and pubs on this stretch of Wilmslow Road as they make there (sic) way home at all times of the night. These premises, although small in number, are operating grossly excessive hours. Taken together with the cumulative impact of the bars and pubs in Fallowfield, the nuisance caused extends well beyond the vicinity of the individual premises."***

**(Old Moat Councillor)**

<b>Q10. Do you agree with the boundary of the area 'Wilmslow Road' being subject to a special policy?</b>		
	Number of Responses	Percentage of responses
Yes	60	82%
No	7	10%
Not stated	5	7%
Neutral	1	1%

- 5.4 Again, the majority (82%) agrees with the proposed boundary. The response from McDonalds was recorded as 'neutral'. The joint response from Mcdonalds / Nandos / Subway did not state an opinion on this point. The Students Union was the only respondent against a policy in this area to state that they did not agree with the boundary:

***“Due to the far lower amount of licensed activities within the boundaries marked as ‘Withington’ and the area marked as ‘Wilmslow Road’, it is unclear what the local authority believe to be a defined saturation point, or indeed, when cumulative impact becomes problematic: either only the main Fallowfield area should be regulated, due to its high amount of licensed trade, or all boundaries should be dealt with as one entity.”***

**(Students Union)**

- 5.5 13 replies proposed the extension of the land at the rear of the Ram and Shackle premises. Photographs of this land are attached at Appendix 5. Part of the land is the beer garden of the Ram and Shackle. Although the land is not licensed for any licensable activities, given that it forms part of a prominent alcohol-led licensed premises that is within the proposed area boundary, the Committee may wish to include it within the boundary of the special policy so that the whole curtilage of the Ram & Shackle is included in the policy. The remainder of the land refers to 'The Ram Lodge', which is a hostel and is not currently licensed. Photographs of this property are attached at Appendix 6. Members may wish to propose including this property within the boundary of the special policy given its proximity to the special policy area and its relationship with the Ram & Shackle.

***“All land within the curtilage of the Ram and Shackle i.e. up to Mitford Road should be included in order to curb any potential expansion of licensing activities on the Mitford side of the premises.”***

**(The South East Fallowfield Residents Group)**

***“But, there is land at the back of the Ram and Shackle which this pub owns which is not included. Any future expansion of this pub could therefore be outside the remit of a CIP. This land should therefore be included.”***

**(Resident)**

- 5.6 7 proposed the inclusion of the undeveloped land at Egerton Road/Clifton Avenue, which is the same land requested by 6 others in relation to the Fallowfield boundary. Therefore a total of 13 respondents proposed that this land be included within the proposed special policy.

***“The former St John's plot on the corner of Clifton Avenue and Egerton Road. The future of this area is not, as yet, completely finalised e.g. no building work has begun. Prevention is necessary, making sure that no licensed premise can be built here. Also land behind the Ram and Shackle on the corner of Wilmslow and Brook Roads needs to be protected as far as Mitford Road.”***

**(Resident)**

- 5.7 Members may wish to consider whether the land, given its potential for development, should be incorporated within the special policy boundary.

<b>Q11. Do you consider that this (policy) approach in 'Wilmslow Road' is:</b>		
	Number of Responses	Percentage of responses
Not required at all	1	1%
Too restrictive	2	3%
Just right	65	89%
Not stated	5	7%

- 5.8 Of those who expressed an opinion, all, with the exception of the Students Union and Mcdonalds (2), considered that the proposed policy approach was 'just right'. 19 of those in favour of the proposed approach referred to the reasons for Fallowfield and/or Withington. Others referred to number of bars in the area and that in the area but 26 did not give a reason for their answer. 2 considered that all existing licences to come under the policy should be reviewed.

***“Need to reduce anti social behaviour and late night noise and litter.”***

**(Resident)**

***“If there are more bars along this road, Withington and Fallowfield will become a huge drinking area and this will make the problems associated with binge drinking much worse for people who live here.”***

**(Resident)**

- 5.9 The reasons given by the Students Union (offers no solution) and Mcdonalds, Mcdonalds / Nandos / Subway (disproportionate) were the same as for the Fallowfield and Withington areas.

<b>Q12. Do you consider that there should be amendments to the special policy for 'Wilmslow Road'?</b>		
	Number of Responses	Percentage of responses
Yes	45	62%
No	24	33%
Not stated	4	5%

- 5.10 Similar to Fallowfield and Withington, the majority of the changes (39) sought were to include Temporary Event Notices within the remit of the policy. 2 responses also sought a review of all existing licences via the policy.
- 5.11 All of the proposed changes (and reasons for them) are consistent with those requested for Fallowfield and Withington. The same principles apply in that Temporary Event Notices cannot, come under the remit of a special policy relating to cumulative impact, nor can such a policy seeks reviews of licences.
- 5.12 The reasons given by the Students Union (a performance review mechanism should be built in) and Mcdonalds (2) (removal of late night refreshment) were the same as for the Fallowfield and Withington areas.

## **6 General Comments**

- 6.1 The final consultation question posed was to allow for any other general comments the respondent wanted to make.
- 6.2 The vast majority stated that they were supportive of the policy proposals. Even the main objectors to the policy proposals (McDonalds, McDonalds / Nandos / Subway, the Students Union) acknowledged that there are issues within the areas to be addressed, although they do not consider the proposed approach as being an appropriate one.

***"I am the franchisee for the McDonald's restaurant on Wilmslow Road Fallowfield, which falls under the area defined as 'Wilmslow Road' in the consultation.***

***I hold the McDonald's franchise for nine restaurants across the area. Over the past four years I have invested over £500,000 in improving the Wilmslow Road restaurant for the benefit of my customers and the wider community.***

***Across my business I employ over 700 staff, 85 of whom work in my Wilmslow Road restaurant and a large number of whom are long-standing employees, who have been promoted through the ranks. 90% of my staff live within 2 miles of the Wilmslow Road restaurant are therefore not only employed in my area, they live in the community too. As local residents they are passionate as I am about giving back to the community. Through our support of local causes we ensure that our restaurant has a positive impact on the local area.***

***Both as a local businessman and through local engagement with the local community, I recognise that the concentration of licensed premises in the area designated by the consultation has been linked by many to alcohol-fuelled anti-social behaviour.***

***My restaurant is predominately a dine-in restaurant; less than 10% of our business between the hours of 6am and midnight is take away business. Our restaurant therefore mitigates anti-social behaviour and noise issues in the area. It does this not only by containing customers on site, reducing the likelihood of them contributing to in-street anti-social behaviour, but also by serving to mitigate the effects of alcohol in customers due to the food they consume.***

***I understand the concerns raised by the consultation. However, it is my belief that we have the opportunity to positively manage the impact of hot food licensed premises in the area, such as my own, without restricting our potential to grow, while also meeting the concerns of the local community.***

***My team and I do and will continue to do everything we possibly can to***

***ensure the impact we have on the local community is positive. We are very enthusiastic about the idea of working with the local community to try to find a workable solution; rather than increasing regulation on local businesses.”***

***(Mcdonalds)***

***“As the group (of hot food businesses, who operate in the area that is subject to the consultation) has only recently been formed our plans for addressing the litter issues are still in the very early stages, however we plan to report the results of our initiative to the Licensing Unit of Manchester City Council in advance of the unit reporting its findings from the consultation to the Licensing Policy Committee.***

***We propose a trial period for the 'Litter Action Zone', after which period we would present the results of our action for the consideration of the Licensing Policy Committee.”***

***(Mcdonalds / Nandos / Subway)***

***“The Students’ Union does admit that there are specific issues relating to the Studentification of Fallowfield, and the subsequent relational issues between long-standing residents and the student community that this entails: there should be space for the Local Authority to more robustly deal with licensing issues within this community. The Students’ Union, however, does not agree that the special policy being suggested is the fairest way of dealing with these issues going forwards, and believe that the policy may actually have a regressive effect on the area, for reasons listed in response to Question 1. We do not, however, oppose the concept of Fallowfield being regulated, and for issues that develop to be more pro-actively dealt with.”***

***(Students Union)***

- 6.3 Most comments were in support of the Policy and included details of some of the wider issues associated with the local night time economy:

***“Fully supportive of the CIP; absolutely essential for this area because the number of licensed premises has become excessive in recent years and the licensing objectives are being undermined by the saturation of alcohol outlets.”***

***(Resident)***

***“The excessive drunkenness in these areas has to be stopped. This policy is one potentially useful tool which could begin to restore some peace to local residents and some dignity to our city.”***

***(Resident)***

***“We fully support the Cumulative Impact Policy for all three proposed areas of Fallowfield & Withington because there are so many problems associated with the excessive number of bars, clubs and off licenses in this student dominated area.”***

***(Fallowfield Residents Association)***

***“There is general agreement among the citizens in the areas that restriction needs to be placed on the influence of excessive alcohol consumption on our environment. The proposals represent part of the potential solution to the problem.”***

***(Resident)***

***“Fallowfield has been my home for 20 years. I am a very heavy sleeper and don't tend to get disturbed by noisy drunks at night but the rest of my family are often woken up. I think the off licenses in particular make night time drinking on the streets the cause of a lot of anti social behaviour. I support the special policy for all three areas of Fallowfield and Withington.”***

***(Resident)***

***“I would fully support the implementation of this policy and I unreservedly applaud MCC for taking this initiative. I and my family enjoy living in Fallowfield, we do not wish to move away, and will continue to battle on to make this area a pleasant place to live. But on many occasions local residents feel absolutely powerless/impotent in trying to combat to cope with living in an environment where alcohol 'Rules OK'.”***

***(Resident)***

***I would beg the board to pass this plan. We as residents are DESPERATE and need your help and support to prevent us having to move out of homes that we love on account of the impact of the alcohol availability in the area. Please help us.***

***(Resident)***

***“... Alcohol related problems have significantly increased in recent years since the change in licensing laws in 2003. This student dominated area has changed in character because of the large rise in late night licensed premises which allow and encourage young people to drink to excess. The rise in middle-of-the-night anti social behaviour such as bins being overturned and drunken singing outbursts have gone hand in hand with the rise in alcohol outlets. Community Guardians have consistently opposed new license applications and variations to extend licenses but because there is little proof tying anti social behaviour to a particular premise, it has been difficult to prevent the escalation of such clubs and bars in Fallowfield. We have been asking for a Cumulative Impact Policy for many years and feel it is well overdue. The granting of the Cumulative Impact Special Policy for these three areas would bring some relief to residents and we sincerely hope that the Policy will be adopted.”***

***(Fallowfield Community Guardians)***

***“... We believe that the Council's proposal for a new policy is a logical and practical step to address the issues of crime, disorder and public nuisance in Fallowfield, Withington and Wilmslow Road and we support the implementation of such a policy.”***

***(Corridor Manchester)***



***“Late night alcohol fueled anti social behaviour increases the need for additional street cleansing at weekends due to full wheelie bins being overturned.***

***All three areas suffer from heavy litter caused by fast food takeaways. The recycling bins are constantly full, and bags and rubbish left at the side of the containers look unsightly.***

***MCC has to dispatch additional resources to address the proportionately greater amount of litter generated in the three areas. This includes;-***

- Two pedestrian litter pickers 5 days per week. (7 hours per day)***
- 1 man plus vehicle to tidy up around recycle bins. (2 hours per day)***
- 2 men plus compactor (1 hour per day) to remove black bags e.g.***
- Litter bins require emptying daily.”***

***(██████████ on behalf of the Student Safety Tactical Action Partnership)***

***“It is estimated that approximately 90,000 adults in Manchester drink at increasing or higher risk levels, and that there are around 13,000 dependent drinkers of the city. Alcohol misuse can impact on physical and mental health and wellbeing, crime and antisocial behaviour, homelessness, worklessness, and poor outcomes for children. The Local Alcohol Profile for England indicates that physical health problems related to alcohol misuse are worse in Manchester when compared to regional and national averages. Data collected as part of the Manchester Royal Infirmary’s A&E Alcohol Liaison Project indicates high numbers of alcohol-related A&E attendances from areas to the south of the city centre i.e. postcode areas M13 and M14. A recent (2011) University of Manchester survey of 800 students carried out on behalf of NHS Manchester and Greater Manchester Police indicated that 75% of respondents lived in the Fallowfield/Withington areas of the city. Nearly half (49%) of all students surveyed said they go out drinking/partying in Fallowfield on a weekly basis. Of the students who were aware of how much they drank on an average night out, 76% reported binge drinking (defined as more than double their daily limit in a single session). 62% reported that they themselves or a friend had been victims of crime while living in Manchester with nearly half (47%) believing that alcohol had played a role in these crimes.”***

***(Public Health Manchester)***

## **7 Proposed Revisions to the Policy**

7.1 Proposals made in response to the consultation that are not achievable under a special policy (for reasons outlined in the preceding paragraphs of this report) shall not be considered. They are:

- 1. The inclusion of Temporary Event Notices**
- 2. Review of all existing licences**
- 3. Roll-back of existing hours**

7.2 Members are asked to consider the following proposals (further details of which are set out in paragraphs 7.3 onwards) to the special policies made in response to the consultation:

### **1. Boundary Changes:**

**a) Inclusion of Fallowfield Campus**

**b) Inclusion of undeveloped land at corner of Egerton Road and Clifton Avenue**

**c) Inclusion of land at the rear of the Ram and Shackle**

**d) Extension of the Withington boundary southwards:**

- i. To include that part of Withington ward (and therefore all the licensed premises therein)**
- ii. As far as the Christie site to include Red Lion and rank of shops opposite. I suspect some of these are struggling to survive and could be replaced by off-licences**
- iii. As far as Cotton Lane**
- iv. To include the rest of the Withington Ward as there are a number of licensed premises within the area currently excluded**
- v. To include the licensed premises at the southern end of the Village with the boundary being at the southern edge of Withington Ward**

**e) To amalgamate the boundaries**

**2. To make the special policy for Withington less restrictive**

**3. Remove Late Night Refreshment**

**4. Not adopt a special policy in any areas**

## **1. Boundary Changes**

7.3 Boundary changes proposed in responses to the consultation shall be considered individually. The addition of areas would require further consultation with the landowners or operators of any licensed premises within the area prior to any decision being made to include that area.

### **a) Inclusion of Fallowfield Campus**

7.4 In response to this proposal, whilst the campus does include licensed premises that students, both on and off campus, can access, it is considered that the campus premises shall fall outside of the proposed special policy. It is not considered that they impact upon the cumulative impact issues being experienced in the area and there is no evidence to suggest it is necessary for the promotion of the licensing objectives. Therefore, it is not proposed to amend the boundary to include this area.

7.5 It is not considered that there is a risk of cumulative impact issues arising as a result of the University Campus, which does not contribute the same issues as by the concentrations of commercial premises in the area.

7.6 Therefore, it is not recommended that this land be included within the special policy area.

### **b) Inclusion of undeveloped land at corner of Egerton Road and Clifton Avenue**

7.7 Currently there is planning permission for a residential development on the land. If the area were to be developed to include commercial uses, it would be sensible to include the land within the special policy.

7.8 However, members may wish to consider whether the land, given its potential for development, should be incorporated within the special policy boundary.

7.9 The property currently has planning permission as a residential development but no work has commenced. The Planning department have advised that commercial development of this area of land would be unlikely to be permitted.

7.10 However, given the proximity of this land to the proposed special policy areas of Fallowfield and Wilmslow Road, and whilst there is the possibility of potential for commercial development, it is recommended that should the special policy be implemented for the Fallowfield and Wilmslow Road areas, a recommendation is made to incorporate this land within a subsequent review of the policy upon consultation with the landowner.

### **c) Inclusion of land at the rear of the Ram and Shackle**

7.11 The area identified is two-fold. One section is part of the 'beer garden' of the Ram and Shackle. The remaining section of land relates to the Ram Lodge, a hostel, associated with the Ram and Shackle.

- 7.12 The Committee may wish to ensure that the special policy area incorporates the whole of the Ram and Shackle boundary. It is recommended that should the special policy be adopted for the Wilmslow Road area, a recommendation is made to incorporate this land within a subsequent review of the policy upon consultation with the landowner.
- 7.13 Given the current nature of the Ram Lodge, it is considered that there is no immediate need for it to be incorporated within the special policy. However, having regard to its inter-relationship with the Ram and Shackle, which is a prominent alcohol-led licensed premises with the proposed special policy area, the Committee may consider it prudent for the Ram Lodge to be incorporated within the policy to prevent development of it into a licensed premises, which could potentially undermine the policy.
- 7.14 Therefore, it is recommended that should the special policy be implemented for the Wilmslow Road area, a recommendation is made to seek to incorporate this land within the Special Policy, upon consultation with the landowner. It is proposed this would be conducted as part of the forthcoming review of the full Licensing Policy,, which will incorporate the provisions of the Police Reform and Social Responsibility Act 2011 and Live Music Act 2012.

**d) Extension of the Withington boundary southwards:**

- i. To include that part of Withington ward (and therefore all the licensed premises therein)**
  - ii. As far as the Christie site to include Red Lion and rank of shops opposite. I suspect some of these are struggling to survive and could be replaced by off-licences**
  - iii. As far as Cotton Lane.**
  - iv. To include the rest of the Withington Ward as there are a number of licensed premises within the area currently excluded.**
  - v. To include the licensed premises at the southern end of the Village with the boundary being at the southern edge of Withington Ward.**
- 7.15 There is currently no evidence to demonstrate that there are cumulative impact issues arising in any of these identified areas or that there is a genuine risk of them arising. The reasons given for these areas are as a 'catch-all' to ensure that all licensed (and potential licensed) premises are captured. However, a special policy is not a general policy but must be one targeted to address specific problems of cumulative impact i.e. "the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area". It is not considered that there is a significant number of licensed premises (or risk of there being) at this stage, and so it is not proposed to extend the boundary to include these premises.

**e) Amalgamate the boundaries**

- 7.16 In their response, the Students Union proposed that either only the main Fallowfield area should be regulated, due to its high amount of licensed trade, or all boundaries should be dealt with as one entity.

- 7.17 It is recommended that where a special policy takes an identical approach in respect of multiple adjoining areas, those areas are amalgamated into one area that is subject to the special policy. It is proposed that this amalgamated area is named as 'Fallowfield/Wilmslow Road'.

## **2. To make the special policy for Withington less restrictive**

- 7.18 Two Withington Councillors, one Old Moat Councillor and the Withington Civic Society stated in their responses to the consultation that they considered the proposed approach in Withington as too restrictive. Whilst supportive of a special policy, there was concern that the policy approach originally proposed could be so restrictive as to be a potential threat to necessary regeneration.

***“Withington is struggling as a viable, attractive district centre and so, whilst a CIP is essential, it should not be so restrictive as to deter an entrepreneur who wanted to open, e.g. a restaurant.”***  
***(Withington Civic Society)***

***“Marginally too restrictive. But I would support it so long as there were no escalation of restrictions. I would for example support new license applications for licensed restaurants and also perhaps for small venues in this District Centre. I would not support any arbitrary curfew either for proposed new premises or for reviews or variation requests. That could kill this Village which would benefit from development of a balanced, food-led, live entertainment-enhanced night time economy.”***  
***(Withington Councillor)***

***“I am concerned that a blanket policy will discourage regeneration within the Withington District Centre. Could I suggest that new licence applications within the area be considered on their merits bearing in mind their location (whether on Wilmslow Rd or a side street of Wilmslow Rd), the size of the premises applying, its proposed use (pub, bar, restaurant, cafe-bar, takeaway, off-licence) and its hours of operation”***  
***(Withington Councillor)***

- 7.19 Whilst it is important to note that a special policy does not represent an 'iron curtain' that prohibits all further licensed premises, it is accepted that a special policy could be seen as a possible deterrent for potential new operators. However, a special policy must be considered having regard to whether it is appropriate in order to ensure the promotion of the licensing objectives within the area rather than just economic reasons.
- 7.20 It is recognised that the current number of licensed premises and related problems in Withington are at a much lower level than those in Fallowfield, and whilst respondents to the consultation are concerned with a risk of potential displacement from Fallowfield if Withington is not subject to a special policy, there is also support for additional licensed premises to be permitted provided the premises are of an acceptable nature dependent upon its merits.

- 7.21 Having regard to the current relatively low level of issues in Withington and its lower number of licensed premises, it is considered that there is not the need for a special policy that exists in other areas. This is also demonstrated by the appetite by some for more licensed premises, subject to limitations. Consideration of the individual merits of an application can already be achieved by the existing general Statement of Licensing Policy through consideration of the Key Factors, which if implemented, should ensure that only such applications consistent with promoting the licensing objectives are granted where relevant representations are made.
- 7.22 Cumulative Impact is considered in the Guidance as “the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area...In some areas, where the number, type or density of premises selling alcohol is high or exceptional, serious problems of nuisance and disorder may be arising or have begun to arise some distance from the premises.”
- 7.23 Whilst concerns were raised over the potential impact of the policy upon regeneration of the area, the issue is whether the policy is appropriate for the promotion of the licensing objectives. The concerns by respondents typically refer to the risk of Withington becoming problematic. However, it is generally recognised that the Withington area is not currently experiencing cumulative impact and so a special policy is not, at this point, necessary or proportionate.
- 7.24 Therefore, it is proposed that Withington is not subject to a special policy at this time. Instead, the issues in the area will be continued to be monitored, particularly for potential displacement from Fallowfield, and the policy situation be reviewed if there is evidence of cumulative impact issues are beginning to arise.

### **3. Remove Late Night Refreshment**

- 7.25 It is not proposed to remove late night refreshment from the special policy in any area. It is not considered that a ‘Litter Action Group’ justifies a departure from the original policy proposal and its reasons.

### **4. Not adopt a special policy in any areas**

- 7.26 The Students Union argue that the policies offer no resolution to the problems being experienced in the areas and may harm the future economic position in Withington and Fallowfield. A special policy addressing cumulative impact will not offer a remedial effect in isolation. What it can provide is to prevent the worsening of the situation within the defined area by controlling the growth of licensed premises within the area and ensuring that only premises able to demonstrate that they will not add to the local cumulative issues, would be granted. At the same time, enforcement activity can focus on existing problematic premises, which should help to achieve a reduction in the existing problems within an area.

- 7.27 In respect of the potential harm to the economy, as previously mentioned, the focus on whether a special policy is appropriate must be on ensuring the promotion of the licensing objectives rather than economic aims.
- 7.28 The responses in support of the policy demonstrate that the general consensus is that the problems, particularly the Fallowfield and Wilmslow Road, are at a level now that it is necessary to prevent the worsening of the situation, and so the policy is needed. There are also concerns over the potential of Withington developing into a problem.
- 7.29 As previously stated, it is now proposed that a special policy is not implemented in Withington. However, the arguments by the Students Union do not justify departing from the special policy in Fallowfield and Wilmslow Road.
- 7.30 Although the levels of problems are lower in Wilmslow Road area, it immediately adjoins the most problematic area of Fallowfield. Therefore, it is appropriate that this area is subject to the special policy as it is likely to be the highest risk of experiencing displacement from Fallowfield given its direct proximity.
- 7.31 **Consequently it is proposed that only the Fallowfield and Wilmslow Road areas are subject to the special policy in the original terms proposed but that those areas are merged into one single area, to be known as "Fallowfield/Wilmslow Road" (Appendix 7).**
- 7.32 **A draft revised Special Policy in accordance with the above provisions is attached at Appendix 8**

## **8 Reasons for the proposed policy approach**

- 8.1 The predominant concentration of licensed premises is within the Fallowfield area. This area suffers from the greatest levels of crime (both general and alcohol-related) compared to surrounding areas, which is demonstrated in the Cumulative Impact Analysis (Appendix 5 of The Review of the Impact of Licensed Premises in Fallowfield and Withington considered by the Licensing Policy Committee on 19 March 2012). The levels of crime recorded with an alcohol marker have risen annually between 2009 and 2011, of which there is the strongest concentration in the late evening and early hours of the morning. The degree of ASB recorded in the area is also significantly disproportionate compared to the rest of the former B & C policing divisions, since conjoined to form the E Division. Between 2009 and 2011, the average rate of ASB per square kilometre in the E Division was 343 incidents per square kilometre compared to an average of 2180 incidents per square km in Fallowfield. Similarly, ASB levels peak during the late night/early morning, and correlate with the closing times of alcohol-led licensed premises.
- 8.2 The complaints from local residents of anti-social behaviour, received both prior to and in response to the policy consultation, repeatedly cite problems of noise, vandalism and antisocial behaviour from persons going out to and returning from licensed premises, including complaints of pre-loading and drunkenness. Additionally, there was evidence of litter caused as a result,

including discarded alcohol containers and takeaway wrappers in the street. Extra street cleaning services are required in the local area as a result of the disproportionate levels of litter, particularly caused by the high numbers of late night takeaways in Fallowfield. Problems of pre-loading en route to licensed premises persist despite the existence of a Designated Public Place Order for Fallowfield.

- 8.3 Therefore, the policy in Fallowfield aims to prevent further alcohol-related crime and antisocial behaviour arising in the area from the customers of licensed premises (including any premises that might act as a flashpoint), particularly during such hours with higher levels of crime, antisocial behaviour and hours likely to affect the ability of local residents to get a good night's sleep. Additionally, premises that are likely to contribute to litter problems in the area, particularly in relation to pre-loading en route to licensed premises, and hot food takeaway wrappers at the end of the night.
- 8.4 Within the Wilmslow Road area, there are far fewer licensed premises. However, alcohol-related crime has continued to rise between 2009 and 2011. Given the area's direct proximity to Fallowfield as well as having regard to the similar nature of existing premises in Wilmslow Road to those in Fallowfield, it is correct that this area is also covered under the policy. This approach is also strongly supported in the responses received the public consultation, which cite similar problems to those experienced in Fallowfield.
- 8.5 The aims of the policy are to reduce levels of crime and antisocial behaviour with the areas, especially those that are alcohol-related and during the early hours of the morning. The reasons for this approach are set out above and supported by the evidence presented at Appendices 2-10 in the Review of the Impact of Licensed Premises in Fallowfield and Withington considered by the Licensing Policy Committee on 19 March 2012 and responses to the public consultation. These aims will support the Aspirations for our Neighbourhoods as set out in Section 7 of the Council's Statement of Licensing Policy 2011-14.

## 9. Conclusion

- 8.6 The Committee is asked to:
1. Consider the proposed policy approaches detailed in Section 7 of this report and determine the special policy as set out in Appendix 8, subject to any amendments considered appropriate for the promotion of the licensing objectives by the Committee..
  2. Include within the special policy the considerations and reasons of the Committee in reaching its decision in accordance with (1) above.
  3. Recommend to Council that they adopt the special policy, as determined by the Policy Committee in accordance with (1) and (2) above, for incorporation within the Council's Statement of Licensing Policy



4. Recommend that the following areas of land are proposed for inclusion within the special policy area as part of the next review of Licensing Policy:
  - a) The undeveloped land at corner of Egerton Road and Clifton Avenue
5. The land at the rear of the Ram and Shackle including the Ram LodgeRequest officers to undertake an annual review of levels of alcohol-related crime, general crime and antisocial behaviour, in both the special policy area and Withington.

## **9 Contributing to the Community Strategy**

### **(a) Performance of the economy of the region and sub region**

Licensed premises provide a key role as an employer, in regeneration, and in attracting people to the city. The proposed Special Licensing Policy will play an essential role in establishing that only such premises that are able to demonstrate that they shall not add to existing cumulative impact shall be licensed in the special policy areas, which will positively contribution to the economy of the region and sub-region.

### **(b) Reaching full potential in education and employment**

Licensed premises offer employment and training opportunities for local people, particularly those who are young.

### **(c) Individual and collective self-esteem – mutual respect**

### **(d) Neighbourhoods of Choice**

The proposed Special Licensing Policy will play an essential role in establishing only those premises that are able to demonstrate that they shall not add to existing cumulative impact shall be licensed in the affected areas, thereby ensuring the promotion of the licensing objectives, namely the prevention of crime and disorder, the prevention of public nuisance, public safety, and the protection of children from harm

## **10 Key Policies and Considerations**

### **(a) Equal Opportunities (b) Risk Management**

### **(c) Legal Considerations**

10.1 There are no other legal implications to consider.

# GREATER MANCHESTER POLICE - REPRESENTATION

## About You

Name	PC Alan Isherwood
Address including postcode	Manchester Town Hall Extension Lloyd Street Manchester M2 5DB
Contact Email Address	alan.isherwood@gmp.police.uk
Contact Telephone Number	0161 856 6017

## About the Premises

Application Reference No.	LPA 280605
Name of the Premises	<b>Go Local</b>
Address of the premises including postcode	<b>210 Wilmslow Road, Manchester M14 6LF</b>

## Your Representation

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.

Please accept this as formal notification of the Greater Manchester Police objection to the premises licence application in relation to the above premises.

The grounds for the objection are the Prevention of Crime and Disorder and the Prevention of Public Nuisance.

The premises are situated on Wilmslow Road, Fallowfield which is one of the main arterial routes into and out of Manchester City centre.

It is in close proximity to residential properties and is also in an area where there are a large number of bars, public houses, off licenses, late night refreshment outlets and one of the largest student populations in Europe.

Specifically, the application is seeking to allow the provision of alcohol and late-night refreshment until 0000 hours 7 days a week

The Wilmslow Road corridor suffers from littering, noise disturbance and other anti-social behaviour and to allow a further outlet for alcohol in this area is likely to exacerbate these problems and undermine the hard work of the local Neighbourhood Policing Team.

The area where the premises are situated is subject to a Cumulative Impact Policy due to the problems in the area, many of which are noise, littering and anti-social behaviour related.

There is therefore a strong presumption against further alcohol selling premises in this area and GMP can see no reason why this should not be the case with this application. The applicant has not demonstrated how by having another such premises in this area they will not add to the cumulative issues within the area.

MCC's licensing policy states that a genuinely exceptional case would need to be shown. The reasons for this exception should be shown within the operating schedule and must demonstrate that there will be no harm to the licensing objectives, including from departing customers.

While the contents of the operating schedule are a matter for the applicant, where there is objection to a schedule that departs from the Policy, the licensing subcommittee hearing an opposed application will normally expect to be given a good reason for the departure if it is to be asked to make an exception to the Policy.

The effect of the Special Policy is that the Council will refuse applications for a new Premises Licence or Club Premises Certificate, or variation of an existing licence or certificate, whenever it receives relevant representation, unless an applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced

Greater Manchester Police would therefore ask that the application be refused.



**MANCHESTER  
CITY COUNCIL**

**Licensing & Out of Hours Compliance Team - Representation**

Name	Stuart Alderson
Job Title	Neighbourhood Compliance Officer
Department	Licensing and Out of Hours Compliance Team
Address	Level 1, Town Hall Extension, Manchester, M60 2LA
Email Address	Stuart.alderson@manchester.gov.uk
Telephone Number	07971384324

Premise Details	
Application Ref No	M280605
Name of Premises	Go Local
Address	210 Wilmslow Road, Manchester, M14 6LF

Representation
<p>Outline your representation regarding the above application below. This representation should describe the likely effect of the grant of the licence/certificate on the licensing objectives and on the vicinity of the premises.</p> <p>Licensing and out of hours team have assessed the likely impact of the granting of this licence taking into account a number of factors, including the nature of the area in which the premises is located, the hours applied for and any potential risk that the granting of this licence could lead to issues of public nuisance.</p> <p>This premises is situated close to the centre of one of the largest populations of students in Europe. This concentration of students and the high number of licensed premises within the Fallowfield area means this area suffers from greater levels of crime (both general and alcohol-related) compared to surrounding areas, which was demonstrated in the Cumulative Impact Analysis. Due to this cumulative impact the Fallowfield special policy area was formed and included in the council's statement of licensing policy. Kwik-E-Mart is within this special policy area and as such section 5.7 of the statement of licensing policy 2021-2026 applies (see below).</p> <p><i>5.7 The effect of the Special Policy is that the Council will refuse applications for a new Premises Licence or Club Premises Certificate, or variation of an existing licence or certificate, whenever it receives relevant representation, <u>unless an applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced.</u></i></p> <p>This application does not demonstrate how they will not add to the cumulative impact or specifically deal with the issues that Fallowfield disproportionately suffers from including preloading with drinks enroute to licensed premises, drunkenness, litter from discarded drinks containers and ASB.</p> <p><i>5.10 Applicants in respect of premises located in the geographical area defined above will <u>need to address the implications of the Special Policy in their operating schedule in order to rebut this presumption.</u></i></p>

The applications operating schedule does not address the implications of the Special policy.

Manchester City Councils statement of licensing policy states in the special policy are there be a “Strong presumption against” granting an alcohol licence to an off licence and “A genuinely exceptional case would need to be shown. The reasons for the exception should be shown in the operating schedule, and must demonstrate that there will be no harm to the licensing objectives”

The application does not show a genuinely exceptional case to depart from policy. They do not offer anything unique as there 2 other large convenience stores/off licences, Midway Wines and New Zealand Wines, selling similar products already on the same stretch of Wilmslow Rd.

The application does not comprehensively demonstrate how the premises will not undermine the public nuisance licensing objective.

They have not offered any means of dealing with issues of noise nuisance arising from customers arriving, departing or congregating outside, especially late at night. This is a significant problem in this area. There are residential flats above this shop as well as the other shops in this row and to rear of the shops is a very densely populated residential area (see map below). We are already dealing with a local resident’s noise complaint regarding this premises as well as other noise complaints for neighbouring premises. Increasing the availability of alcohol is likely to compound this issue as well as other issues of ASB.

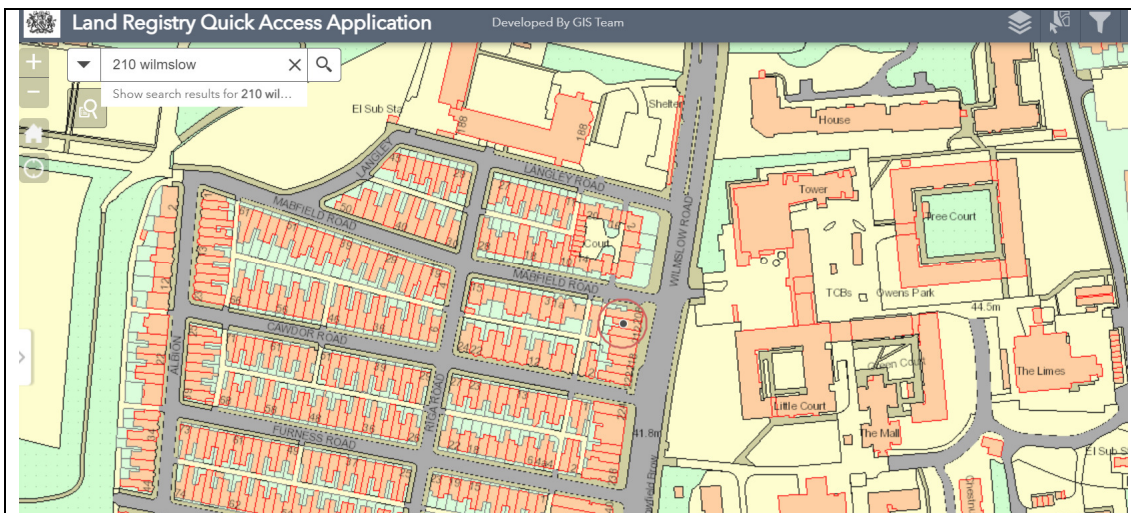
They have offered no plan as to how to prevent issues with on street drinking. They have not addressed how they plan to deal with litter or refuse from their premises, although we have found out that they do have a commercial waste contract. Commercial waste left outside premises overnight for collection is a major cause of night time litter and adds significantly to the cost of street cleaning and should be addressed in the application, but is not.

The lack of detail in the application regarding public safety raises concerns they will undermine this licensing objective.

Procedures are expected to be in place at the premises to initiate 999 calls when an emergency concerning a person’s physical safety is in progress, but nothing like this is offered within the application.

There is no mention of any planning or staff training on how to deal with an emergency or the availability of fire fighting equipment.

There is no mention in the application of any risk assessment having been carried out and whether they intend to employ security. Only from contacting the applicant and asking them have we found out they are planning to employ security.



In conclusion the application has not addressed the special policy or displayed how they will not add to the cumulative impact already being experienced, so there is no reason to depart from the council's policy. Also the lack of detail in the application raises concerns they will undermine the public nuisance and public safety licensing objectives therefore we recommend this application is refused.

Recommendation: Refuse Application

From: [REDACTED]  
Sent: 30 December 2022 05:31  
To: Premises Licensing <Premises.Licensing@manchester.gov.uk>  
Subject: Re: Go Local 210 Wilmslow Road.

Dear [REDACTED]

I confirm this place is open later than 11PM everyday they should have CCTV can be confirmed through.

I do object their Licence application as if they cannot follow Laws and Rules now they will be problem for the Area in future.  
any business which is open after 11PM needs permission to stay open but they donot have and they are open from last few months till 4AM in the morning.

They Also sell Lauging Gas you should do something about that too. Their is takeaway Called OMG right next to them they sell too.

If you need anymore information from me i am here to help

Regards

[REDACTED]

On Wed, Dec 28, 2022 at 11:51 AM Premises Licensing  
<[Premises.Licensing@manchester.gov.uk](mailto:Premises.Licensing@manchester.gov.uk)> wrote:

Dear [REDACTED]

Thank you for your email.

Kwik E Mart MCR Limited have applied for a licence to sell alcohol and supply hot food at 210 Wilmslow Road up to midnight each day.

A licence has not yet been granted so they should not be selling alcohol or supplying food any later than 11pm.

I will pass your email on to our compliance team and ask them to investigate.

Can you please confirm that your email below is an objection to the licence application?

Regards

[REDACTED]

---

**From:** [REDACTED]  
**Sent:** 25 December 2022 02:48  
**To:** Premises Licensing <[Premises.Licensing@manchester.gov.uk](mailto:Premises.Licensing@manchester.gov.uk)>  
**Subject:** Go Local 210 Wilmslow Road.

Hi My Dear,  
I have to Bring Some Concerns in your light about the new place being opened in my neighbor hood.  
KWIK E MART  
210 Wilmslow Road  
Fallowfeild Manchester  
M14 6ZU

1st of All My question to you how they are Allowed to open 24 Hours Without permission.  
i have seen them every day open 4AM in the morning. Suronded with students creating problems and making noises ?

I have done bit of research and found out this place is selling all sorts of illegal stuff. Nitrous oxide canisters. smartwhip they have car outside to deliver too. Selling illegal vapes to students without checking ID.

There are Already 4 more Off licences in this area we do not need another one specially who is there on planed crime to sell laughing Gas.

The person who serves behind the counter almost drunk should be check randomly.

Being a local [REDACTED] i would recommend this place should not get licence till Midnight.

They do not have right system in place,  
they do not have commercial rubbish collecting bins using council bins.  
they are creating public nuisance.  
its dangerous for children as they donot have strict policy to sell tobacco products and selling laughing gas, they will sell to underage too.

My eyesight no good, i might have done some writng errors my applogies.

[REDACTED]



**From:** [REDACTED]  
**Sent:** 02 January 2023 19:03  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Cc:** [REDACTED]  
[REDACTED]

**Subject:** Premises Licence (new) 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF, (Fallowfield ward)

Your Ref: Premises Licence (new) 280605/HH1: Go Local, [210 Wilmslow Road, Manchester, M14 6LF, \(Fallowfield ward\)](#)

To whom it may concern;

I am a long-term resident of [REDACTED] and I am objecting to the request for a new off license, with opening hours to sell alcohol 8am until midnight, 7 x days a week at "Go Local", [210 Wilmslow Road, Manchester, M14 6LF, \(Fallowfield ward\)](#)

These premises (210 Wilmslow Road, Manchester, M14 6LF, that is) are situated on Wilmslow Road, Fallowfield, which is one of the main arterial routes into and out of Manchester City centre.

It is in very close proximity to [REDACTED] and local residential properties and is also in an area where there are several bars, public houses & off licenses and one of the largest student populations in Europe.

This new "Go Local" off licence, would be very near the late-night New Zealand Wines off licence which already has an unbelievable small hour 2am licence (granted before the Cumulative Impact Policy was established) We do not need yet another off licence, *at all* (at any opening hour window)

Make no mistake; The "Fallowfield Brow area" (an area encompassing a canopy of 7 x streets. 5 x streets moving South to North & 2 x streets East to West, of which this new Off License "Go Local" lies in the centre of), is now nothing more than a party/club fested, drunken drugged up conurbation, that's really fit for no human life or existence, becoming one giant noise fest; people to and fro, taxis to and fro, shouting, screeching, hollering, yelling, "music" pumping out ad finitum, from early evening until 6am in the morning.

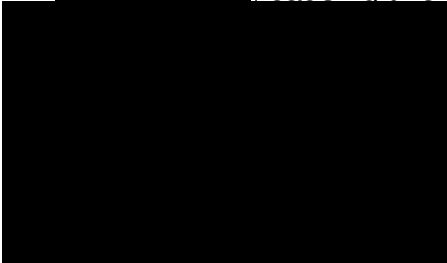
There is a very real danger that this party/club fested, drunken drugged up zombified mass, will descend on these premises with a view to purchasing more alcohol and, highly likely that the area outside the premises will become yet another zone where noisy, inebriated humans (and I use that term loosely) gather to drink alcohol, with people spilling out onto the busy thoroughfare of Wilmslow Road, putting themselves and others at risk. Also, as the area is subject to a Designated Public Place Order it is likely that this order will be breached far more regularly, creating more work for the local police officers.

This will create added noise disturbance which will obviously be extended beyond what is already being suffered by the local residents.

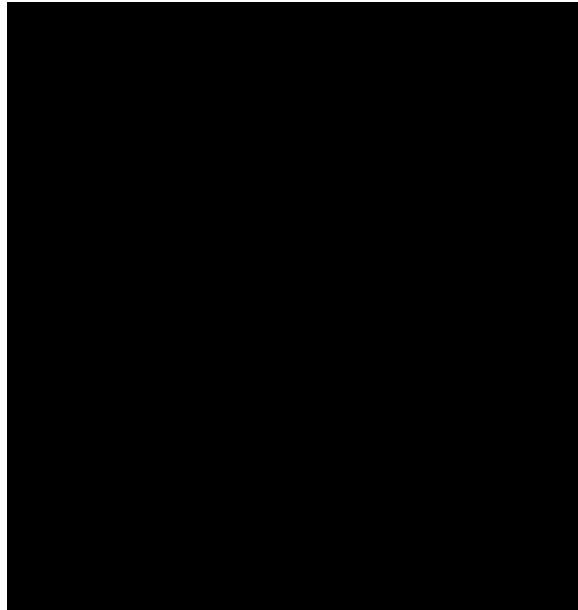
The Wilmslow Road corridor already suffers from begging, street drinking and other alcohol related anti-social behaviour and to allow yet another premises a license to sell alcohol, will undoubtedly exacerbate these problems.

The request for a fresh alcohol licence and late-night opening hours, particularly in the light of what's been happening in the near vicinity in Fallowfield (a murder, serious assaults etc), quite frankly, beggars' belief. Just another cynical, uncaring, feckless outfit then, out to exploit the get down 24/7 party/club zombie liquor saturated wallets and purses that totter around the M14 streets.

In addition, In the [REDACTED] years that I've purchased my car, [REDACTED] it has been "hit/vandalised" 8 x times. Here's one incident and most pertinent to this application; a cctv still of a pair of drunken students smashing into the [REDACTED], causing two huge dents in it [REDACTED]



With all the garbage that pervades the area, we have a rat infestation (in all the years that I've lived here, we've never had that before) I've already spent £42 for a 5 x visit Pest Control event, which was back in October 2022 and now? .. absolutely no surprise at all .. they're back (see picture below from Boxing day in my back yard – 26-12-22) and I'm now booking yet another £42 visit from Pest Control. Garbage from Mr "Go Local" will only add to the overload.



Personally? I am at the very end of my tether in this Fallowfield Brow area; suffering from extreme sleep deprivation, being awoken in the small hours from the transient noise (much of it, created by patrons of drinking emporiums and off licences that provide the liquor of which "Go Local" would be yet another addition to the issues) pervading the streets here and wading through the mountains of garbage, filth, graffiti, herds of drug dealers and rats.

The Wilmslow Road area of Fallowfield has a Cumulative Impact Policy (What this means is that this area has been identified as one in which there is a concentration of licensed premises which is deemed maximum for an area to contain and that the hours in which premises can open and supply alcohol are already at the earliest and latest times acceptable for the area) this extension is only going to add to problems of drunken street noise and nuisance.

Manchester City Council do not create Cumulative Impact Zones lightly and quite frankly, the last thing that the Wilmslow Road/"Brow" area of Fallowfield needs is yet another off licence and becoming a magnet for persons "pre-loading" and "post loading" / going to and leaving, the other establishments in the area and causing further suffering to the local residents.

I would be very grateful if the good members of the committee could consider these points,

Yours sincerely,

[Redacted signature block]



**From:** [REDACTED]  
**Sent:** 02 January 2023 11:19  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Subject:** Fwd: Premises Licence (New) 280605/HH1. Go Local, 210 Wilmslow Road, M14 6LF. Fallowfield Ward.

Hello,

I'm sorry I forgot to add [REDACTED]  
[REDACTED] at the bottom of this email.

Sent from my iPhone

Begin forwarded message:

**From:** [REDACTED]  
**Date:** 2 January 2023 at 10:48:28 GMT  
**To:** Premises Licensing <premises.licensing@manchester.gov.uk>  
**Subject: Premises Licence (New) 280605/HH1. Go Local, 210 Wilmslow Road, M14 6LF. Fallowfield Ward.**

Dear Sirs/Madam,

I am writing on behalf of [REDACTED] Residents Group to object in the strongest terms to the above new licence for alcohol and late opening hours for night time refreshment.

This new convenience store lies in the heart of Fallowfield District Centre's cumulative impact policy area (CIP). The CIP was introduced in 2013 because of evidence which showed that the type and density of licensed premises in the area were negatively impacting on the licensing objectives. The CIP was reviewed and reinstated in 2021 because it was shown that the problems still persist.

The CIP states that there should be no new licences (or variations) within the designated area unless the applicant can show that 'they will not add to the cumulative impact' therefore any risk that a new licence could add to the impact - to whatever degree - should result in the licence application being dismissed in full. This is not a case for compromise.

We note the applicant states that

'the purchase of alcohol is not the intended focus of the business, there is an expectation that alcohol sales will have a limited impact on the area as local people are expected to, on the whole, purchase alcohol along with other products'.

We think that this does not recognise the fact that this area has a highly unusual demographic with a very large transient population including huge numbers of students in the 19 to 21 year old age group. According to research carried out by Wonkhe, in the 2018/19 academic year there were 11,195 students in the M14 6 postcode (i.e. in the immediate locale of this convenience store) and the shop is only metres away from a block of 7 streets known as Fallowfield brow which is home to one of the most densely student populated areas in the city, if not the country. As a consequence, our area has become well known for student house parties and the problems surrounding them (noise, litter and ASB), it is also well known that students often pre-load before going out for an evening and, if there is easy availability, they will often buy more alcohol on their way home which fuels drunken behaviour - inebriated people are often not fastidious when it comes to disposing of takeaway wrappers, cans and bottles and they often make really excessive noise - shouts, screams, singing, sports chants etc. I would like to point out that we are not anti student per se, many local residents were students ourselves, have student aged children, work in the educational sector etc however this behaviour arises because of the huge numbers of young people living away from home for the first time and having easy access to drink/drugs etc here.

The knock on effect of this behaviour is that it impacts on other residents' lives and has been the reason why many (many) long term, vested, (council tax paying) residents have reluctantly moved away and many others talk about being at the very end of their tether.

As long term residents leave, the area becomes even more transient and anonymous... and dangerous. For example Airbnb and other short term accommodation providers have moved in, in addition to the student landlords. Some of these short term stay providers accommodate extremely vulnerable people with complex care needs, including ex alcoholics, the homeless, ex offenders etc and the late night economy on this stretch of road has resulted in it becoming a late night hang out. The core strategy mentions a desire to create 'balanced' and 'sustainable' 'neighbourhoods of choice' and enforcing the CIP is one of the key ways we can work towards achieving this.

Aside from the very obvious distress this ASB causes we have also become increasingly worried by an increase in serious violent crime in the area which often happens in the early hours - in particular the tragic murder of a student in October 2022 who was walking home at 2am after a house party and was stabbed on the

stretch of road where this new convenience store is sited. There was also another violent attack here a few weeks ago and there have been other serious, violent incidents in the last year, including 2 that directly involved residents in our group.

We live in a residential area, NOT a city centre and yet we now have more than 50 late night licensed premises on a stretch of road which is just under 0.4 miles (less than 10 minute's walk). This is a higher density than most town, and even city, centres have and we simply don't have the public resources to police this, especially at the moment. The result is that drunken/drugged up people are often roaming the streets in the early hours, many of whom are young and have a completely false sense of security believing that Fallowfield is 'a student village' and that it is an extension of the Owens' Park Campus. I had a conversation with 2 students at the beginning of the autumn term and they told me exactly that. In this fragile environment, alcohol/drug fuelled arguments can quickly escalate and also criminals can - and do - take advantage. Criminal and ASB figures in central Fallowfield is in fact the reason why we have a Cumulative Impact Policy area.

This area needs to retain and encourage more long term residents to move here, not just to make the area more functional and cared for but also, and very importantly, because long term residents help to keep an area safe. The anonymity and transience here is leading to increased lawlessness and we are not just talking about what some people might think of as 'minor' ASB but also serious criminal offences.

At every residents' meeting I have attended, all these issues are raised... constantly. We therefore ask the applicant to take these matters on board and withdraw this licence application. I realise they perhaps haven't understood the unusual circumstances here because it is so abnormal and extreme. It seems the applicant doesn't view alcohol, or the late opening hours as crucial to their business and it is simply a small 'add on' so it should be possible to run the store without this licence.

If this application isn't withdrawn we urge the panel to reject it in full at the hearing.

A clear message needs to be sent that central Fallowfield is not a free for all and that the CIP is taken seriously and cannot be circumnavigated.

As long term residents, we have seen the problems escalate here over many years and have felt powerless - this has coincided with the rise in the transient population and numbers of licensed premises. Really sadly, when many of us heard of the recent tragic events, we were not surprised and unless and until we see firm action across the board (including the enforcement of the CIP) we will continue to see this.

A final point I would like to highlight relates to definition of our area; Fallowfield. The fact that the original Fallowfield district centre which dates back to Victorian/Edwardian times (and what I have referred to as Central Fallowfield) has been crudely divided into 3 wards (Withington, Old Moat and Fallowfield) means that the stats relating to our neighbourhood are skewed and council officers and councillors have tended not to look at the area - and it's problems - as a whole. I don't think we can ignore this any longer.

Yours faithfully,

██████████

Reference:

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/university-student-19-centre-fallowfield-25370499.amp>



**From:** [REDACTED]  
**Sent:** 29 December 2022 19:18  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Cc:** alan.isherwood <alan.isherwood@gmp.police.uk>; Fraser Swift <fraser.swift@manchester.gov.uk>; [REDACTED]  
**Subject:** Premises Licence (new) 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF, (Fallowfield ward)

Dear Sirs

I am writing on behalf of [REDACTED] as agreed at our meeting on [REDACTED]. We wish to strongly object to the application for an alcohol licence and late night opening hours at 210 Wilmslow Road, M14 6XQ.

The main reason for our objection is that the current number of licensed premises in Fallowfield District Centre (54 licensed premises) already cause residents many problems; in particular in terms of noise, nuisance, littering, criminal damage and anti social behaviour. This is in fact the second objection for an alcohol licence in the last fortnight. Our area has so many licenced premises applications and this puts an onus on residents at a busy time of year. These alcohol related anti-social problems have been going on for years and are so pronounced that a cumulative impact policy zone has been assigned to Fallowfield District Centre to try and prevent further problems. The CIP was introduced in 2013 and remains in place following a review in 2021. The Go Local Convenience store (formerly Kebab King) falls within this CIP zone. Adding another off licence will undoubtedly add to the existing problems.

This premises falls within the M14 6 subpostcode which has a massive student population unlike most other suburbs of Manchester. In 2018/19 there were 11,195 students and this is likely to be higher now due to the expansion of Owen's Park by more than 1000 bedspaces and the intensification of HMOs due to permitted development. The proximity of these premises to so many young people make off licences a real 'go to place' for last minute purchases of alcohol for pre drinks social parties, drinking at bus stops as money saving ways of getting in a few drinks before paying bar prices and of course the infamous Fallowfield house parties which cause much distress to many residents.

We consider that another source of alcohol will definitely add to the cumulative impact. Other nearby off licences have caused problems over many years, including New Zealand Wines (granted a 2am licence before the Cumulative Impact Policy), Gaffs (licence revoked), Fallowfield Convenience Store (licence revoked), Midway Wines granted licence to midnight before CIP, application to extend hours refused in 2019. Examples of problems at some of these premises include:

**Breaking: New Zealand Wines has been raided by the police and is now under criminal investigation**

<https://thetab.com/uk/manchester/2018/10/07/breaking-new-zealand-wines-has-been-raided-by-the-police-and-is-now-under-criminal-investigation-37430>

**Police seize nitrous oxide during Wilmslow Road raid**

The premises was reportedly 'openly selling' the drug to local residents

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/fallowfield-drugs-police-nitrous-oxide-15254084>

**An ode to Gaffs: the pride and joy of Fallowfield**

<https://thetab.com/uk/manchester/2017/02/28/ode-gaffs-pride-joy-fallowfield-25968>

There are no exceptional reasons given by the applicant to deviate from the cumulative impact policy. policy. MCC Statement of Licensing Policy 2021-2026 recommends refusal ***"The effect of the Special Policy is that the Council will refuse applications for a new Premises Licence or Club Premises Certificate, or variation of an existing licence or certificate, whenever it receives relevant representation, unless an applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced"***

We believe that the licensing objectives will be undermined if another off licence is added to the existing licensed premises. Considerable problems exist for residents and relate to public nuisance, crime and disorder and public safety. Everyday occurrences include broken glass on surrounding pavements, vomit, litter and noise from patrons drinking in outside areas. Noise of patrons going to and from premises also creates a lot of sleep disturbance for residents.

Fallowfield has also recently been in the national news following the murder of a student in the early hours of the morning at the end of October 2022. Another serious incident occurred a few days ago when a male in his 40s was assaulted and required surgery. In our experience of living in this area, we know that the consumption of alcohol and drugs exacerbates the problems which create so much anti social behaviour.

**University student stabbed to death in Fallowfield**

<https://www.independent.co.uk/news/uk/greater-manchester-police-cpr-manchester-crimestoppers-university-b2211285.html>

**Investigation underway as man left needing surgery following 'serious assault'**

<https://www.manchestereveningnews.co.uk/news/greater-manchester-news/investigation-underway-man-left-needing-25784666>

Our group have been meeting monthly since 2006 and at all of our meetings residents recount incidents of noise and anti social behaviour which often relates to the consumption of alcohol in bars and clubs as well as on-street drinking and house partying. This has a terrible effect of many of us and affects our sleep, health and well being. Alcohol is a root cause of many of these problems. **World Health Organisation research highlights that: "Restriction of availability has been assessed as a highly cost-effective best-buy intervention...Countries are recommended to regulate... to reduce the hours of sale (a highly cost-effective measure) and density of outlets."** <https://www.who.int/initiatives/SAFER/alcohol-availability>

Residents in our group are suffering immense stress and strain from living close to Fallowfield District Centre.

We do not have a problem with the premises being operated as a convenience store but we completely oppose the request for the sale of alcohol as this will undoubtedly add to the cumulative problems that already exist. We see no exceptional reason to depart from this policy and for all the reasons outlined above we request that this application be refused and that the Cumulative Impact Policy be upheld

Yours

██████████  
██  
██

---

**From:** [REDACTED]  
**Sent:** 03 January 2023 12:54  
**To:** Premises Licensing <Premises.Licensing@manchester.gov.uk>  
**Subject:** Premises Licence (new) 280605/HH1: Go Local, 210 Wilmslow Road, Manchester, M14 6LF, (Fallowfield ward)

I am writing as Director of Residential and Sport Services at the University of Manchester to express opposition to the proposed application for the provision of late night entertainment Monday to Sunday from 11pm to midnight and for the supply of alcohol for consumption off the premises from Monday to Sunday from 8am to midnight. I hope this application will be refused on the grounds that this could create additional public nuisance in the area.

The supporting reasons for this objection are as follows:

There are a number of University of Manchester students living in Halls of Residence and private rented sector properties in immediate proximity to these premises. As an institution the University of Manchester works hard to encourage our students to behave responsibly in the local community. To provide students resident in Halls and in the private sector access to a premises serving alcohol for consumption off the premises until midnight would greatly undermine the work undertaken to ensure responsible behaviour. I believe that if the premises were granted this licence to allow the supply of alcohol off premises until midnight would contribute to the problems that exist in the local area surrounding noise, litter and anti-social behaviour. It should be noted that there have been incidents in the immediate vicinity of these premises in recent weeks including the tragic murder of a student and serious assault.

Secondly Fallowfield is in a special Cumulative Impact Policy zone owing to the problems associated with the consumption of alcohol. There is already numerous premises supplying alcohol in Fallowfield for consumption both on and off premises and I do not think that allowing this outlet to supply alcohol in Fallowfield for consumption off the premises is required or desirable.

Thirdly as an institution the University of Manchester is working hard to resolve issues that surround the studentification agenda to promote better community relations. An Off-Campus Student Affairs Officer works hard with other agencies to tackle these issues. A common complaint received from local residents is the problem of anti-social behaviour after students have attended venues. The work that the University has invested in this will be potentially damaged if another outlet within Fallowfield has the capacity to supply alcohol for consumption off the premises until midnight after students will have left other local venues.

In conclusion I would like to emphasise that I am opposed to the granting of this variation to the licence to allow this new licence at these premises for the provision of late night entertainment Monday to Sunday from 11pm to midnight and for the supply of alcohol for consumption off the premises from Monday to Sunday from 8am to midnight. I trust my views will be reported to the Licensing Committee.

Yours sincerely,

[REDACTED]

[REDACTED] Director of Residences & Sport  
The University of Manchester

[REDACTED]  
[www.manchester.ac.uk/sport](http://www.manchester.ac.uk/sport) | [www.accommodation.manchester.ac.uk](http://www.accommodation.manchester.ac.uk)

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank

## Schedule of Licence Conditions

Conditions consistent with the operating schedule	Agreed	Proposed by
<ol style="list-style-type: none"> <li>1. On first appointment, all staff employed at the premises will receive training on the Licensing Act 2003 including input on preventing underage sales, preventing sales of alcohol to people who are drunk and any other relevant matters. Training shall be regularly refreshed at no less than annual intervals. The training must be recorded and be accessible on the premises and made available for inspection upon request of a Police Officer or an authorised officer of the licensing authority or (in the case of online training) within 48 hours.</li> <li>2. A CCTV system will be in operation at the premises and recorded images shall be retained for a period of 31 days. CCTV images will be provided to the police and other responsible authorities as soon as practicable and in any case within 48 hours of a request for such images, subject of the provisions of the DPA.</li> <li>3. An incident register will be maintained at the premises and made available to the authorities on request.</li> <li>4. A register of refusals of alcohol will be maintained at the premises. The register will be made available for inspection by the Police and other responsible authority</li> <li>5. The premises will adopt a 'Challenge 25' policy. This means that if a customer purchasing alcohol appears to be under the age of 25, they will be asked for proof of their age, to prove that they are 18 years or older.</li> <li>6. Posters will be on display advising customers of the 'Challenge 25' policy.</li> <li>7. The only forms of identification that will be accepted will bear their photograph, date of birth and a holographic mark and/or ultraviolet feature. Examples of appropriate identification include a passport, photocard driving licence, military ID, and Home Office approved proof of age ID card bearing the PASS hologram.</li> </ol>	N/A	Applicant
<b>No conditions have been proposed by objectors</b>		

This page is intentionally left blank