

**PLEASE NOTE: ALL REPRESENTATIONS AND SUPPORTING EVIDENCE MUST BE SUBMITTED TO MANCHESTER CITY COUNCIL WITHIN 28 DAYS, STARTING THE DAY AFTER THE PREMISES IN QUESTION MAKES AN APPLICATION (TO FIND OUT THE CLOSING DATE CALL THE LICENSING UNIT ON 0161 234 4512)**

<b>ABOUT YOU</b>		PLEASE NOTE: LICENSING OFFICERS, LICENSING COMMITTEE MEMBERS AND THE APPLICANT CAN VIEW THE INFORMATION PROVIDED ON THIS FORM
<b>Your first name (required)</b>	<b>Your last name (required)</b>	
Bernard	McMenamin	
<b>Your address including postcode (required)</b>		
Trading Standards Service 1 Hammerstone Road Manchester M18 8EQ		
<b>Contact email address</b>	<b>Contact phone no</b>	
Bernard.McMenamin@manchester.gov.uk	0161 234 1589	

<b>ABOUT THE PREMISES</b>
<b>Application Ref No. (if known):</b>
LPA 291659
<b>Name of the Premises about which you would like to make a representation:</b>
Union East Tower
<b>Address of the Premises (including postcode if known):</b>
Union East Tower, Water Street, Manchester, M3 4JQ

<b>YOUR REPRESENTATION</b>
<b>Please outline your representation below and continue overleaf. This should be the likely effect of the grant of the licence / certificate on the licensing objectives on and in the vicinity of the premises in question. (Please continue on a separate sheet of paper if necessary)</b>
<p>The Trading Standards Team have assessed the likely impact of the granting of this application taking into account a number of factors, including the conditions offered and times applied for and any potential risk that the granting of this application could lead to issues which do not uphold the licensing objectives specifically the protection of children from harm.</p> <p>The application is for a residential apartment block with a reception area and first floor amenity area selling alcohol via a vending machine on ground floor near reception area.</p> <p>When considering the application, the Trading Standards Team have given consideration to Manchester City Councils Statement of Licensing Policy 2021 – 2026.</p> <p>The original application addresses few points relating to the Licensing Objectives especially in protecting children from harm. Although staff training is offered in the application, point 1. Is to clarify when training is refreshed.</p> <p>Giving consideration to the above application, the Trading Standards Team therefore recommend that the following conditions are applied to the licence.</p>

1. All staff engaged in the sale of alcohol will be trained with regards to the Challenge 25 policy and sales by proxy. This training will be documented, and training should be refreshed at no greater than 6 monthly Intervals.
2. The Premises Licence Holder will ensure that signage demonstrating the Challenge 25 policy as well as selling alcohol to children by proxy are placed at the entrance to the premises as well as being displayed in all areas serving alcohol.

**Supporting Evidence:** In addition to your own written / oral testimony to the Licensing Sub-Committee, you may wish to provide evidence to support your representation. You will need to show how this evidence relates to the premises in question. Examples of supporting evidence include oral testimony, written testimony, noise records, video or photographic material, crime and disorder data, other statistical data, reports etc.)

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

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

<b>About the Premises</b>	
Application Reference No.	291659
Name of the Premises	<i>Union East Tower</i>
Address of the premises including postcode	Union East Tower Water Street Manchester M3 4JQ

<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>This application is for a licence to sell alcohol using an alcohol vending machine that operates 24 hours a day in the reception of Union East Tower.</p>
<p>Public health feel that the granting of this licence in its current form could undermine the following licensing objectives:</p>

1. Prevention of crime and disorder
2. Protection of children from harm

Deansgate is the ward with the highest licensed premises density in the city; there are 255.8 licensed premises per km and 257.9 licensed premises per 10,000 residents. Deansgate also has the 5<sup>th</sup> highest percentage of licensed premises open late at night. Within a 10-minute walk of the building for which this application has been submitted, there are already 5 supermarkets (all of which serve alcohol until 11pm), 2 off licensed premises, and numerous bars, pubs, and restaurants, all of which serve alcohol. Existing research suggests that a higher density of alcohol licensed premises is associated with higher levels of binge drinking and violence. Data from the ONS also show the proportions of violent incidents that were alcohol-related increased as the afternoon and evening progressed, from 23% of violent incidents occurring between noon and 6pm, to 52% were between 6pm and 10pm and 83% occurred between 10pm and midnight. Therefore, granting a licence for the sale of alcohol 24-hours a day in Deansgate may increase overall alcohol consumption in the population, and increase consumption late at night, thus increasing residents' exposure to violence and crime.

In Manchester, there were 135 alcohol-related hospital admission episodes in people under 18 recorded between 2018/19 to 2020/21. This translates to a rate of 36.6 per 100,000, statistically significantly higher than the national average (29.3 per 100,000). The application states "*All alcohol vending machine transactions will be verified by residents' key fobs containing the users age and name*". However, no additional ID check is requested by the machine distributing the alcohol. Therefore, someone could take the key fob of a resident and use this to acquire alcohol without needing to provide recognised forms of ID eg : a passport, photo card driving licence, an EU/EEA national ID card or similar document, an HM Forces warrant card, or a card bearing the PASS hologram. Therefore, granting a licence for the sale of alcohol via a vending machine in this manner may increase the risk of underage drinking.

The application also states "*The reception will be staffed 24/7 and each receptionist will be trained on the sale of alcohol and how to deactivate the alcohol vending machine*". However, no detail has been provided about what this training entails. It is also not necessary for the person attempting to buy alcohol to approach the receptionist to access the vending machine, and thus the receptionist must assess age and intoxication/ vulnerability from a distance. The vending machine is to be "deactivated" by the receptionist once they notice someone underage or intoxicated is trying to access the alcohol or if they are leaving reception. The need for the receptionist to deactivate the vending machine as an extra step increases the risk of the vending machine being left activated inappropriately and thus the sale of alcohol to underage or intoxicated individuals. The receptionist will also be a lone worker, and this may put them at risk if they attempt to prohibit the sale of alcohol to someone who is already intoxicated. Data from 2018-2019 NDTMS (National Drug Treatment and Monitoring Services) estimates 1692 adults dependent on alcohol live with children in Manchester, resulting in an estimated 2,770 - 3,008 children being directly impacted by alcohol misuse in the home. Furthermore, 794 children in need assessments performed in Manchester cited alcohol misuse by a parent as an issue. Granting a licence for the sale of alcohol via a vending machine may increase the alcohol consumption of individuals dependent on alcohol, lead to more hazardous patterns of drinking, and therefore may subject vulnerable children to indirect alcohol related harm.

