

GREATER MANCHESTER POLICE - REPRESENTATION

About You

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About the Premises

Application Reference No.	LPA 293348
Name of the Premises	N & W Convenience Store
Address of the premises including postcode	Unit 3, 163-165 Great Ducie Street, Manchester, M3 1FF

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 application for a premises licence in relation to the above premises.

The grounds for the objection are the Prevention of Crime and Disorder, the Prevention of Public Nuisance, Public Safety and the Protection of Children from Harm.

The premises are situated a 5-minute walk from the Booth Centre, which is a charity premises attended by members of the homeless community, many of whom have alcohol related problems and some of whom drink alcohol on the streets, at all times of the day and night.

Having this premises selling alcohol 24 hours a day in such close-proximity is highly likely to see street drinkers attracted to the premises in the early hours, as no other premises in the area sell alcohol around the clock.

The Strangeways area also suffers from high levels of anti-social behavior and street drinking and the local policing team is working hard to address these issues.

Therefore, the hours requested by the applicant for 24 hour alcohol sales are not suitable for a premises in this particular area as the access to alcohol around the clock will almost certainly exacerbate these issues.

Manchester City Councils own Statement of Licensing Policy states:

7.36 Where the licensing authority's discretion is engaged, premises applying for early morning daytime hours to sell alcohol will be given particular consideration in relation to their proximity to schools, play areas, nurseries, children's centres and other youth amenities to protect children from harm, as well as groups (such as persons who are alcohol-dependent) who could become more vulnerable or present a greater risk of crime, disorder and public safety issues as a result of excessive alcohol consumption or who may be drawn to particular premises if they are licensed to sell alcohol at earlier times. Where its discretion is engaged, the licensing authority will give consideration to the general demand for alcohol treatment in an area as a proxy indicator of problems.

Therefore GMP ask that this application is refused.



Licensing & Out of Hours Compliance Team - Representation

Name	Wayne Adams
Job Title	Neighbourhood Compliance Officer
Department	Licensing and Out of Hours Compliance Team
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Premise Details	
Application Ref No	REF: 293348
Name of Premises	N & W Convenience Store
Address	Unit 3, 163-165 Great Ducie Street, Manchester, M3 1FF

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 (LOOHT) team have assessed the likely impact of the granting of this application taking into account a number of factors, including the nature of the area in which the premises is located and any potential risk the granting of this licence could lead to issues of public nuisance.

The application for the Premises Licence requests sale by retail of alcohol and opening hours to the public as the following:

Monday	0700hrs – 0659hrs
Tuesday	0700hrs – 0659hrs
Wednesday	0700hrs – 0659hrs
Thursday	0700hrs – 0659hrs
Friday	0700hrs – 0659hrs
Saturday	0700hrs – 0659hrs
Sunday	0700hrs – 0659hrs

This is in direct contravention of the hours that have been stipulated by Manchester City Council's Planning Department for the premises which are set out as follows:

Monday	1100hrs – 2300hrs
Tuesday	1100hrs – 2300hrs
Wednesday	1100hrs – 2300hrs
Thursday	1100hrs – 2300hrs
Friday	1100hrs – 2300hrs
Saturday	1100hrs – 2300hrs
Sunday	1100hrs – 2300hrs

The applicant has also submitted an operating schedule to meet the requirements of the four Licencing Objectives as outlined within the Licensing Act 2003, the requirements of which are as follows:

1. Prevention of Crime and Disorder
2. Public Safety
3. Prevention of Public Nuisance
4. Protection of Children from Harm

However, Licensing and Out of Hours feel that the applicant has been vague in their submission and the content of their operating schedule is woefully inadequate for the proposed premises given the location in which it is to be sited and the proposed operational hours.

Furthermore, as the applicant has stated that they are proposing to utilise 36% of the premises footprint for the provision of liquor over the proposed operational hours, Licensing and Out of Hours are concerned that this provision is going to have an adverse effect on the local and transient population. **Section 7.36 of the Statement of Licensing Policy 2021 – 2023 (Proximity to Sensitive Issues)** states that:

“Where the licensing authority’s discretion is engaged, premises applying for early morning daytime hours to sell alcohol will be given particular consideration in relation to their proximity to schools, play areas, nurseries, children’s centres and other youth amenities to protect children from harm, as well as groups (such as persons who are alcohol-dependant) who could become more vulnerable or present a greater risk of crime, disorder and public safety issues as a result of excessive alcohol consumption or who may be drawn to particular premises if they are licensed to sell alcohol at earlier times”

This piece of legislation is highly relevant to Licensing and Out of Hours objection of this licence as Coffee 4 Craig, Unit 5, 153 Great Ducie Street, Manchester, M3 1FB is in close proximity to the proposed premises. Coffee 4 Craig is a charitable organisation that assist’s members of the Street Homeless Community who in some cases have ongoing alcohol, drug or societal dependencies or who are “clean” from such dependencies to restore their independence, provide hope and a fresh start in life. Licensing and Out of Hours does not feel that the granting of this licence would assist these members of society positively.

Furthermore, there are already two late night licenses in operation in the same block that this premises intends to operate from. The combined dispersal from this group of premises, although staggered throughout the course of the night is likely to lead to an increase in disorder within the local community.

Secondary to Section 7.36, it is also evidential that the proposed hours will have a negative impact on the local area and its residential population. In respect of this I refer the Licensing Committee to **Section 7.33 of the Statement of Licensing Policy 2021-2023 (The proximity of the premises to local residents and other local businesses, particularly in relation to the potential for nuisance)** where:

“Later hours will generally be more appropriate within the city centre than other areas due to the developed infrastructure in respect of managing a later night-time economy, such as the comprehensive integrated CCTV network, increased access to public transport, cleansing services, and a more visible enforcement presence. In mixed-use environments, such as the city centre, noisier impacts are not always derived from actions of a small number of excessively antisocial individuals but can also come from large numbers of people going about the business of having a good time. While such environments will not be expected to be completely noise-free and peaceful environments, the authority considers that noise affecting residential properties should remain within tolerable levels such that home life remains viable and restful sleep a possibility.”

Considering the above legislation and the negative effect that the presence of this premises will have on the local residential population and those members of society that need support for their alcohol, drug or societal addictions, Licensing and Out of Hours are recommending that the granting of this licence is refused.

Recommendation:

Refuse Application

INSERT NAME OF RESPONSIBLE AUTHORITY - **REPRESENTATION**

About You	
Name	Submitted on behalf of David Regan, DPH
Address including postcode	Department of Public Health Manchester City Council Manchester Town Hall Albert Square M60 2LA
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Contact Telephone Number	

About the Premises	
Application Reference No.	293348
Name of the Premises	N & W Convenience Store
Address of the premises including postcode	N & W Convenience Store, Unit 3, 163-165 Great Ducie Street, Manchester, M3 1FF

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.	
The department of Public Health would like to submit a representation against the above licence application. Public Health have concerns that approving this licence to allow the sale of alcohol 24 hours a day in Cheetham could harm the local population, exacerbate inequalities in the city, and compromise the following licencing objectives:	
<ol style="list-style-type: none">1. Prevention of crime and disorder2. Prevention of public nuisance	

3. Protection of children from harm

Research has shown there is a link between the increased availability of alcohol through extended opening hours and increased alcohol consumption. However, the impacts of alcohol consumption in a population are not felt equally across society. Increased levels of deprivation are associated with increased levels of alcohol-related harm. Manchester is ranked the 6th most deprived local authority in England. Cheetham is the 14th most deprived ward in Manchester, and there are higher than average levels of deprivation in this part of the city when compared to regional and national averages. Therefore, residents from Manchester and Cheetham are more likely to be vulnerable to alcohol-related harms.

The approval of a licence that allows the sale of alcohol 24 hours a day does not foster a supportive environment for people who are dependent on or misuse alcohol and need to reduce their drinking. The location of this premises is just a 7-minute walk away from the Change Grow Live Carnavorn Street Hub, where vulnerable adults and young people attend to access support services and treatment for alcohol misuse. Though the rate of people seeking treatment for alcohol misuse in Cheetham is not higher when compared to other wards, many people suffering harm due to alcohol misuse do not enter treatment. This is well recognised in areas in which a larger proportion of the local population follow religions that prohibit consumption of alcohol, such as Cheetham. This is thought to be secondary to increased stigma associated with acknowledging there is a problem and seeking treatment. Therefore, the treatment numbers for Cheetham may not necessarily reflect the level of hidden harm being experienced by residents who are dependent on alcohol but have not sought treatment. This hidden harm extends beyond the individual who misuses alcohol and negatively impacts the family unit and wider community. When a child lives with a parent or guardian who misuses alcohol, this is termed an adverse childhood experience. The cumulative impact of this trauma can have long-term consequences for a child's physical and mental health. Therefore, approving a licence that will increase alcohol consumption in the population, and increase the likelihood of adults dependent on alcohol relapsing or consuming more alcohol, will undermine the licensing objective to protect children from harm.

Children may also come to harm if they can purchase alcohol from this premises. Though the applicant does stipulate they will operate a challenge 25 policy, the proximity of this premises to the Manchester College, a higher education setting that has pupils as young as 16 in attendance, means there is likely to be a high footfall of young people coming to this premises, increasing the likelihood of underage purchases, particularly when operating such extended hours.

The premises is also only a short walk from several homeless support services. People who are homeless are at higher risk of alcohol misuse and dependence. The provision of alcohol 24 hours a day in this area, where there will be many vulnerable people, may result in people relapsing and purchasing alcohol when the support services are not open. Therefore, approval of this licence in this location is likely to put vulnerable people at risk. There is also

the risk that the congregation of people at a 24 hour off licence late at night, throughout the night and into the early hours of the morning to purchase and consume alcohol could cause a public nuisance. Concerns have also been raised by law enforcement suggesting this area is a hotspot for anti-social behaviour, and thus approval of such a licence will only compound pre-existing issues in this area, causing further distress to local residents.

Alcohol and violence are linked. Victims of violent crime perceived the offender or offenders to be under the influence of alcohol in over half of all violent incidents reported in the Crime Survey for England and Wales. The survey also reported 70% of violent incidents that occurred in the evening or night were alcohol-related. The proportions of violent incidents that were alcohol-related increased as the afternoon and evening progressed. 23% of violent incidents occurring between noon and 6pm involved alcohol, whereas 52% between 6pm and 10pm, 83% between 10pm and midnight, and 84% between midnight and 6am. Allowing the sale of alcohol for 24 hours a day therefore increases the risk of more violent crime and thus undermines the licensing objective to prevent crime and disorder. Cheetham has the 12th highest number of offences where alcohol involvement was flagged in the City. 40% of these offences were domestic violence.

Research conducted in Greater Manchester demonstrates a clear link between increased alcohol consumption and increased incidences of domestic violence. Witnessing domestic abuse is yet another adverse childhood experience. Exposing children to an increased risk of domestic violence by allowing the sale of alcohol 24 hours a day, again, undermines the licensing objective to protect children from harm.

In summary, numerous concerns have been raised on review of this application. On review of the available evidence, to approve a licence for the sale of alcohol 24 hours a day in this area could cause harm to the local population and undermine the licensing objectives to; prevent crime and disorder, to prevent a public nuisance, and to protect children from harm. The department of public health therefore request this application is refused.



**MANCHESTER
CITY COUNCIL**

Neighbourhoods Team - Representation

Name	Michael Ripley
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Department	North Neighbourhood Team
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Email Address	Michael.ripley@manchester.gov.uk
Telephone Number	07929 823349

Premise Details

Application Ref No	293348/PW5
Name of Premises	N & W Convenience Store
Address	Unit 3, 163-165 Great Ducie Street, Manchester, M3 1FF

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 North Neighbourhoods Team (NNT) have assessed the likely impact of the grant of this premises license, 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. and the ability to uphold the four licensing objectives: specifically, the public nuisance objective.

The premises would be on Great Ducie Street, a main arterial route to the city centre of Manchester. The surrounding area is a mix of residential, commercial and industrial properties. Gurdwara Sri Guru Harkrishan Sahib temple is to the rear of the premises and faces the proposed outdoor area, the new Manchester College is approximately 330 Meters from the premises and Cheetwood primary school is approximately 400 meters from the premises. The premises itself is located close to the AO Arena, being approximately 400 meters from the premises. This has a capacity of 21,000 at maximum and is one of the largest live venue arenas in the country.

The applicant has submitted a basic operating schedule with this application on how they intend to uphold the licensing objectives; however a number of the conditions offered are not sufficient for the opening hours given its location just outside of the City Centre and given its siting detailed above.

The Council's Statement of Licensing Policy 2021 – 2026 states that license conditions will :

- Be Precise and enforceable
- Be tailored to the individual type, location and characteristics of the premises and events concerned

We would hold that the conditions are not robust , clear or detailed enough in nature given its location and characteristics as a 24 hour premises. We do not feel it has taken into account any of these factors and that the conditions are intentionally vague.

There have been two late night licenses recently granted in the same block that this premises intends to operate from. We are concerned that by granting this license, dispersal from these premises will be difficult to manage and dwell in this area increased, leading to a likelihood of disorder. We are further concerned that three late night licenses in this area, all in the same block, is wholly too much outside of a city centre setting and give its location on a main arterial route.

The four licensing objections are ;

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

The front of this premises is covered by a loading / waiting ban, and there has been no consideration given over to how vehicles, deliveries from and servicing will operate to this premises without causing disruption to the main arterial route to and from the city centre and prevent public nuisance.

The premises has also given over 36% of its available floor plan to alcohol sales. We would hold that this is excessive given its location near schools and colleges and does not uphold the protection of children from harm or the prevention of crime and disorder.

The premises has not stipulated any mention of SIA approved security staff on site which we would expect as a minimum given the hours that it seeks to open and its location so close to the City Centre.

Lastly, the premises has not obtained requisite planning material in the form of a material change of use to operate the premises in this manner. There has also been no planning application submitted in order to support the material changes to the building that this application has stipulated.

Recommendation: Refuse Application