



Representations on a Current Application for a Grant/Variation/Review of a Premises Licence or Club Premises Certificate under The Licensing Act 2003

Before completing this form please read the Guidance Notes at the end of the form

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I/We (Insert name)

Wish to make representation about the application for variation/grant for a premises licence/club premises certificate (delete as applicable)

PART 1 – PREMISES OR CLUB PREMISES DETAILS

Postal Address of Premises or Club Premises, or if none, ordnance survey map reference or description Gateshead Service Station, Sunderland Road, Gateshead,	
Post Town Gateshead	Post Code NE10 0NR

Name of premises licence holder or club holding club premises certificate (if known) TG Convenience Stores Limited
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Number of premises licence or club premise certificate (if known)
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PART 2 – DETAILS OF PERSON MAKING REPRESENTATION

- | | Please
Tick ✓ |
|--|--------------------------|
| 1) A responsible authority (please complete (C) below) | ✓ |
| 2) A member of the club to which this representation relates (please complete (A) below) | <input type="checkbox"/> |
| 3) Other persons (Please complete (A) or (B) below) | <input type="checkbox"/> |

(A) DETAILS OF INDIVIDUAL MAKING REPRESENTATION (fill in as applicable)

Mr Mrs Miss Ms Other Title (for example, Rev)

Surname

First Names

I am 18 years old or over Yes (Please Tick)

Current Address	<input type="text"/>		
Post Town	<input type="text"/>	Post Code	<input type="text"/>

Daytime contact telephone number

E-mail address (optional)

(B) DETAILS OF OTHER PARTY MAKING REPRESENTATION (e.g Body or Business)

Name and Address

Telephone Number (If any)	<input type="text"/>
E-Mail address (optional)	<input type="text"/>

(C) DETAILS OF RESPONSIBLE AUTHORITY MAKING REPRESENTATION

Name and Address Alice Wiseman Director of Public Health Gateshead Council Regent Street Gateshead NE8 1HH
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Telephone Number (If any)	0191 433 2777
E-Mail address (optional)	

This representation relates to the following licensing objective(s)

- | | Please
Tick ✓ |
|--|-------------------------------------|
| 1. The Prevention of Crime and Disorder | <input type="checkbox"/> |
| 2. Public Safety | <input checked="" type="checkbox"/> |
| 3. The Prevention of Public Nuisance | <input checked="" type="checkbox"/> |
| 4. The Protection of Children From Harm | <input checked="" type="checkbox"/> |

Please state the ground(s) for representation (please read guidance note 1)

This representation is made in my capacity as Director of Public Health for the Borough of Gateshead.

The Director of Public Health in Gateshead is concerned that the application for 24-hour alcohol sales at TG Convenience Stores Limited are not in accordance with the promotion of the licensing objectives.

Since 2013 Directors of Public Health have been 'responsible authorities' under the Licensing Act 2003. The role of the Director of Public Health is to help promote the health and wellbeing of the local populations they serve. The Public Health approach to reducing harms arising from alcohol misuse is to encourage and promote responsible drinking and protect young people from related harm. This is an expansive remit that influences a wide range of circumstances, including local licensing arrangements. Similarly, the licensing regime is concerned with the promotion of the licensing objectives, which collectively seek to protect the quality of life for those who live, and work in the vicinity of licensed premises, and those who socialise in licensed premises.

International evidence suggests that making it less easy to buy alcohol, by reducing the number of outlets selling it in a given area and the days and hours when it can be sold, is an effective way of reducing alcohol-related harm (NICE, PH24). Control policies in this area (regulating availability) reflect the theory that if alcohol is less easy to obtain, alcohol consumption and harm will decrease (Public Health England, 2016).

Rising consumption has been attributed to the increased affordability, availability and promotion of alcohol, along with a greater social acceptance of regular drinking and a tolerance of drunkenness. Increased availability of alcohol has come about through the progressive relaxation of the licensing regime. The contributory role that alcohol plays in a wide range of adverse social consequences is also increasingly recognised with links to crime, social disorder, fire fatalities, violence, domestic

violence, child neglect and work-related problems. Poorer populations and communities experience a disproportionately greater level of alcohol-attributable harm.

The time at which alcohol is available is rarely measured, however, it is recognised (PHE, 2016) that purchasing alcohol at 6.00am has different implications to purchasing for consumption at 6.00pm and it is acknowledged that longer serving hours cause greater alcohol related harm (PHE, 2016). A number of international studies have shown that each additional 1-hour extension to the opening time of a premises selling alcohol was associated with a 16% increase in violent crime (Rossow & Norstrom 2012) and a 34% increase in alcohol related injuries (de Goeij, Veldhuizen, Buster & Kunst, 2015). The Felling ward already has significant issues in relation to alcohol related crime and violent crime and the evidence suggests that the extensive hours asked for in this application would exacerbate this. The rates of alcohol related anti-social behaviour in the area around the premises are also some of the worst in the borough as are alcohol related ambulance call outs.

Early morning purchasers are more likely to be alcohol misusers and may thereby contribute to antisocial behaviour such as street drinking. In fact, early morning drinking is considered one of the indicators for alcohol misuse (this is screened for within the AUDIT alcohol misuse screening questionnaire). I would also suggest that the times purchase later in the day reflect the current availability for off sales in the locality so as not to increase the likelihood of additional alcohol related harm.

Those who are alcohol-dependent drink regularly to keep any withdrawal symptoms away, drinking early, or first thing in the morning (to avoid withdrawal symptoms). However, due to their physical dependence they may not appear to be drunk, and are served. However, they are still at serious risk of developing conditions due to heavy drinking (liver damage, cirrhosis, and cancers). The levels of wholly attributable hospital episodes for the Felling ward which clearly show the level of alcohol related harm in the area. The hospital admissions for this ward are more than double the rate for Gateshead as a whole.

Additionally, the premises is situated within a 10 minute walk to two schools. It is likely that children will live close to the premises and are likely to be negatively impacted as a result. For example, early in the morning children could be exposed to street drinking on their way to school.

I have concerns regarding the hours of alcohol sales requested and I would be willing to meet with the applicant to discuss licence conditions that we feel would help to satisfy the promotion of the licensing objectives in this locality.

Please provide as much information as possible to support the representation

(Please read guidance note 2)

The premises is located in the Felling ward, which is a ward with high levels of deprivation with 82.6% of the residents of this ward are within the 20% of the most deprived area. This compares to a Gateshead average of 24.9%. This is relevant as the evidence shows that deprived populations and communities experience a disproportionately greater level of alcohol-attributable harm (AFS and SHAAP, 2011)

The Director of Public Health objects to the variation to this licence as it does not support the licensing objective, specifically the promotion of public safety, prevention of public nuisance and the protection of children from harm. The sale of alcohol during these extended hours would further contribute to the level of alcohol related harm experienced in this ward.

The Felling ward is subject to some of the highest rates of alcohol related harm in the borough:

- Highest rate of wholly attributable alcohol related hospital admissions (1757 DSR per 100,000 compared with 852 for Gateshead as a whole)
- 4th highest rate of alcohol related ambulance call outs, 7.4 per 1,000 population (6.1 per 1000 for Gateshead)
- 2nd highest rates of alcohol related crime and alcohol related sexual offences, 3rd highest rate alcohol related violent crime
- Local evidence shows a substantial level of alcohol related harm at LSOA levels in this locality

The harm experienced across Gateshead is highlighted in the following statistics:

- Gateshead currently has the 3rd highest rate of alcohol related admissions (persons, narrow) to hospital in England
- Since 2008/09 the rate of admissions to hospital for alcohol related conditions has increased by 25.4%
- Gateshead has the 2nd highest rate for alcohol related hospital admissions in the North East
- Since 2008/09 the rate of admissions to hospital for alcohol related conditions for females has increased by 33.2%. The projected trend is for this indicator to continue to increase.

My objection to this variation is supported by the growing knowledge of the role of alcohol in a wide range of acute and chronic disorders, and a greater understanding of its negative social impacts. Licensing is and always has been a whole population intervention which should be employed to

protect our population from harm.

According to estimates from Balance, alcohol related harm in Gateshead costs around £401 per head (taking into account costs to the NHS, crime and licensing, social services and the workplace). The cost per head across the North East is £386 and across England it is £363 per head.

In the Balance 2013 North East Alcohol Behaviour and Perceptions Survey 71% of responders in Gateshead thought it was completely unacceptable to buy alcohol from a garage forecourt.

Further supplementary evidence will be provided to support this representation.

References

- AFS & SHAAP (2011) Re-thinking alcohol licensing
- de Goeij MC, Veldhuizen EM, Buster MC, Kunst AE The impact of extended closing times of alcohol outlets on alcohol-related injuries in the nightlife areas of Amsterdam: a controlled before-and-after evaluation. *Addiction*. 2015;110(6):955-64.
- NICE. Public health guideline (PH24). *Alcohol-use disorders: prevention*
- Public Health England (2016) *The public health burden of alcohol and the effectiveness and cost effectiveness of alcohol control policies: an evidence review*. London: Public Health England.
- Rossow I, Norstrom T. The impact of small changes in bar closing hours on violence. The Norwegian experience from 18 cities. *Addiction* 2012, 107 (3): 530-7.

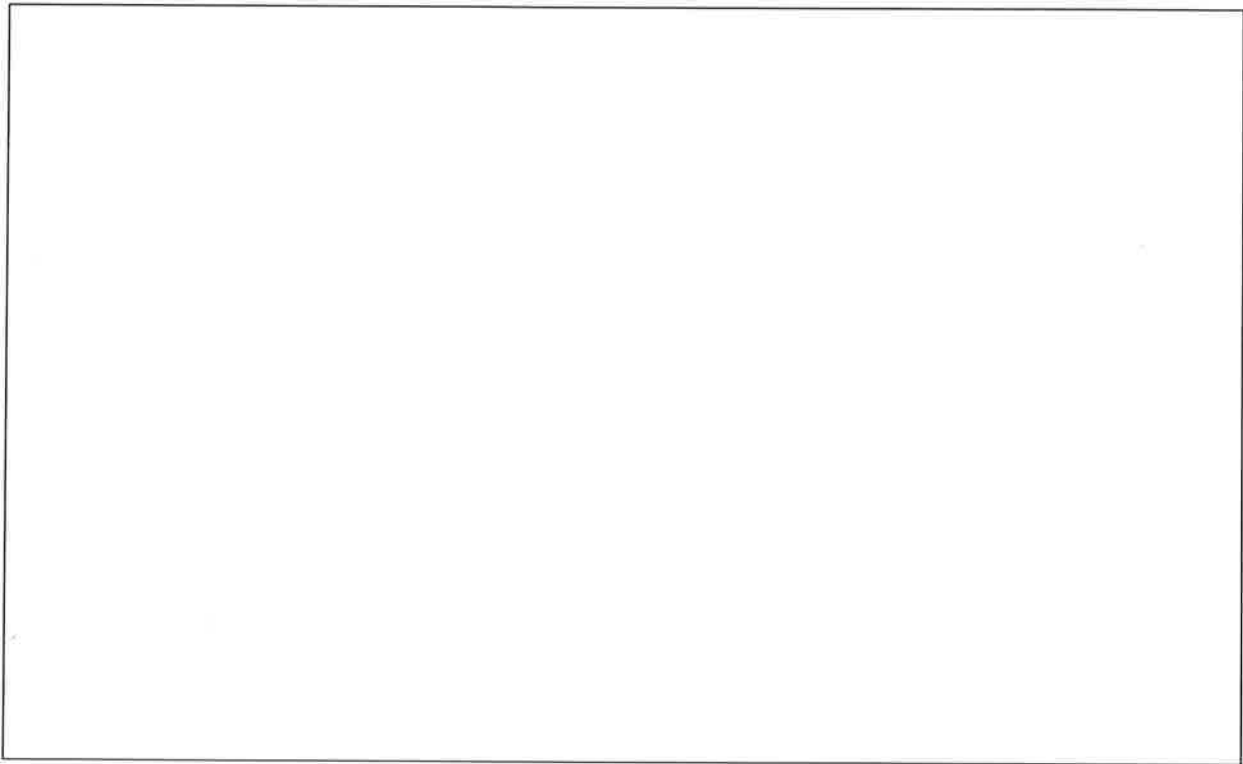
Please
Tick ✓

Have you made any representation relating to these premises before?

If Yes, please state the date of that representation

Day		Month		Year			

If you have made representation before relating to this premises please state what they were and when you made them.



How We Collect And Use Information

The information collected, on this form and from supporting evidence, by Gateshead Council will be used to process your application. The information may be passed to other Enforcement Agencies as permitted by law.

We may check information provided by you, or information about you provided by a third party, with other information held by us. We may also get information from certain third parties, or give information to them to check the accuracy of information, to prevent or detect crime, or to protect public funds in other ways, as permitted by law. These third parties include Government Departments and local authorities.

We will not disclose information about you to anyone outside Gateshead Council nor use information about you for other purposes unless the law permits us to.

Gateshead Council is the Data Controller for the purposes of the Data Protection Act 1998. If you want to know more about what information we have about you, or the way we use your information, you can ask at Civic Centre, Regent Street, Gateshead, NE8 1HH

Part 3 – Signatures (Please read guidance note 3)

Signature of representative or representatives solicitor or other duly authorised agent. (See guidance note 4) If signing on behalf of the representative please state in what capacity.

Signature	<i>Alan Wiseman</i>	Date	
Capacity	Director of Public Health		

Contact name (where not previously given) and address for correspondence associated with this representation. (Please read guidance note 5)	
Post Town	Post Code

Telephone Number (if any)	
E-mail Address (optional)	

Notes for Guidance

1. The ground(s) for representation **must** be based on one or more of the licensing objectives.
2. Please list any additional information or details for example dates of problems, which are included in the grounds for representation, if applicable.
3. The representation form must be signed.
4. A representative's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
5. This is the address which we shall use to correspond with you about this representation.
6. For further information about the Licensing Act 2003 please contact: The Licensing Act Section, Development & Public Protection, Civic Centre, Regent Street, Gateshead Tyne and Wear NE8 1HH
Tel: 0191 433 3918 or 0191 433 3178



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I/We (Insert name)

Wish to make representation about the application for variation/grant for a premises licence/club premises certificate (delete as applicable)

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Post Town Gateshead	Post Code NE10 0NR.

Name of premises licence holder or club holding club premises certificate (if known) TG Convenience Stores Limited
--

Number of premises licence or club premise certificate (if known) 00CH 04454
--

PART 2 – DETAILS OF PERSON MAKING REPRESENTATION

- | | Please Tick ✓ |
|--|-------------------------------------|
| 1) A responsible authority (please complete (C) below) | <input checked="" type="checkbox"/> |
| 2) A member of the club to which this representation relates (please complete (A) below) | <input type="checkbox"/> |
| 3) Other persons (Please complete (A) or (B) below) | <input type="checkbox"/> |

(A) DETAILS OF INDIVIDUAL MAKING REPRESENTATION (fill in as applicable)

Mr Mrs Miss Ms Other Title (for example, Rev)

Surname

First Names

I am 18 years old or over

Yes (Please Tick)

Current Address	<input type="text"/>		
Post Town	<input type="text"/>	Post Code	<input type="text"/>

Daytime contact telephone number

E-mail address (optional)

(B) DETAILS OF OTHER PARTY MAKING REPRESENTATION (e.g Body or Business)

Name and Address

Telephone Number (If any)	<input type="text"/>
E-Mail address (optional)	<input type="text"/>

(C) DETAILS OF RESPONSIBLE AUTHORITY MAKING REPRESENTATION

Name and Address Central Area Command Etal Lane Police Station, Etal Lane, Westerhope, Newcastle upon Tyne , NE5 4AW http://www.northumbria.police.uk/contact

Telephone Number (If any)	101 or text 07786 200 814 ; For the deaf and hard of hearing Minicom 01661 820 915 or text 07786 200815
E-Mail address (optional)	6544@northumbria.pnn.police.uk

This representation relates to the following licensing objective(s)

	Please Tick ✓
1. The Prevention of Crime and Disorder	✓
2. Public Safety	✓
3. The Prevention of Public Nuisance	<input type="checkbox"/>
4. The Protection of Children From Harm	✓

Please state the ground(s) for representation (please read guidance note 1)

An existing premises licence is in place to allow the provision of late night refreshment daily between the hours 23:00-05:00.

In addition to mandatory conditions further x8 conditions are attached to the existing premises licence:

1. *A CCTV system will be installed, or the existing system maintained, such system to be fit for purpose.*
2. *The CCTV system shall be capable of producing immediate copies on site. Copies of recordings will either be recorded on good quality video tape or digitally on to CD/DVD or other equivalent medium.*
3. *Any recording will be retained and stored in a suitable and secure manner for a minimum of 14 days and shall be made available, subject to compliance with Data Protection legislation, to the Police for inspection on request.*
4. *The precise positions of the camera may be agreed, subject to compliance with Data Protection legislation, with the Police from time to time.*
5. *The system will display, on any recording, the correct time and date of the recording.*
6. *The CCTV system will be maintained and fully operational throughout the hours that the premises are open for any licensable activity.*
7. *The premises licence holder will at all times maintain adequate levels of staff. Such staff levels will be disclosed, on request, to the Licensing Authority and Police.*
8. *Adequate waste receptacles for use by customers shall be provided in and immediately outside the premises.*

The applicant is seeking to vary the existing premises licence to allow the sale of alcohol off the premises 24 hours daily.

Northumbria Police have great concerns, that the grant of this licence will undermine the licensing objectives of prevention of crime and disorder, public safety & prevention of children from harm.

Please provide as much information as possible to support the representation

(Please read guidance note 2)

With respect of the application we note the following:

Additional Conditions

Section 16 of the application 'LICENSING OBJECTIVES' invites the applicant to describe the steps they intend to take to promote the four licensing objectives. It has been noted that section b) The prevention of crime and disorder section was left blank.

Adult Entertainment

The applicant provided information in section 14 of the application form 'ADULT ENTERTAINMENT' to inform that "The premises sells alcohol and other age restricted products". The applicant does not expand on the type of products sold that may give rise to concern in respect of children nor does he identify additional steps in section e) The Protection of children from harm to promote this licensing objective with respect to adult entertainment.

Primary Use

Gateshead Council's statement of licensing policy S.8.22 suggests that the applicant sets out in their operating schedule that they will submit data supporting the "primary use other than a garage". There has been no attempt made by the applicant to satisfy the authorities that the Primary Use will be met should alcohol be sold from the premises.

Prevention of crime and disorder, public safety and protection of children from harm

Due to the location the premises are situated and the type of operation proposed Northumbria Police are not satisfied that the licensing objectives of prevention of crime and disorder, public safety and protection of children from harm will be promoted.

Supplementary information will follow.

Please
Tick ✓

Have you made any representation relating to these premises before?

If Yes, please state the date of that representation

Day		Month		Year			

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Part 3 – Signatures (Please read guidance note 3)

Signature of representative or representatives solicitor or other duly authorised agent. (See guidance note 4) If signing on behalf of the representative please state in what capacity.

Signature		Date	30 th July 2019
Capacity	Chief Inspector 7778 Stephen Wykes		

Contact name (where not previously given) and address for correspondence associated with this representation. (Please read guidance note 5)

Ivana Draper 6544
Northumbria Police Licensing Co-ordinator

Post Town Gateshead	Post Code NE8 1BN
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Telephone Number (if any)	n/a
E-mail Address (optional)	6544@northumbria.pnn.police.uk

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