

M Squared Services Ltd.

66 Tithebarn Street
Poulton-le-Fylde
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3 August 2023

Prepared on behalf of;

Mr Emad Ramadan Abdelmaaboud Elsawi Hammouda Premises Licence Holder for King Kebab, 2 Dickson Road, Blackpool, FY1 2AA, Lic Number WA0239

Representation Against New Premises Licence

Applicant Details- Mr Ibrahim Samy Aboelmaged

Premises – 104- 106 Talbot Road, Blackpool, Lancashire, FY1 3AY

Activities – Late Night Refreshment

I am concerned about the Impact of the Prevention of Crime and Disorder Licensing Objective being undermined. The primary basis of the concern comes about due to the location of the premises and the times of the proposed operation.

Prevention of Crime and Disorder

The area sees customers arrive very late at night and all businesses operating at night must deal with the most problematic customer base. Most of the individuals already arrive in the locality heavily intoxicated and the policing tactics in this area have mainly been reactive rather than providing the high visibility presence that occurs at the West end of Queen Street.

This has been recognised and accepted over the last decade and almost every premises in the locality has prescriptive conditions to employ door staff at certain times of their operation. Even the takeaways are subject to strict controls which generally paints an abstract picture regarding the challenges for retailers and authorities alike.

I have operated my premises since October 2018 and the challenges with customers who behave in a disorderly manner happen every day. The weekends are the worst with scuffles and fights on Dickson Road occurring between 01.00hrs and 06.00hrs.

I employ a door supervisor from 03.00hrs in line with my Licence Conditions, many of my competitors have similar conditions but quite often I note that nearby premises with the same conditions neglect their legal responsibility and do not employ door staff. I have reported this concern to my landlord who in turn has reported the matter to the Police to be told by the call taker that it is not a Police responsibility to check on such matters and was a Council

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responsibility. The Police were clear say that they would assist the Council, but the matter needed to be reported to them.

We attempt to deal with matters of disorder that occur in the shop and have had to call the Police when situations are serious. One such example occurred approximately 6 months ago when a knife was pulled on my landlord. My landlord did not know the male, so this was not a personal issue. He called the Police, and it was over 45 minutes before they attended. This incident occurred early in the evening about 21,30hrs but demonstrates the type of incident that occurs in the locality.

Blackpool Council have a Cumulative Impact Assessment that was issued in 2021 and relies on data from 2019. The applicant's premises is approximately 50 metres from mine so sits within Talbot Ward and within the defined Cumulative Impact Area. The data from the 2021 CIA (Cumulative Impact Assessment is shown below)

Figure 4
Alcohol related incidents by hour
Talbot ward 01/01/19 to 31/12/19.
Source: Lancashire Constabulary

Time	Incidents	
00.00	38	
01.00	31	
02.00	29	
03.00	38	
04.00	21	
05.00	20	
06.00	5	
07.00	5	
08.00	6	
09.00	6	
10.00	8	
11.00	6	
12.00	6	
13.00	5	
14.00	6	
15.00	15	
16.00	12	
17.00	20	
18.00	12	
19.00	27	
20.00	25	
21.00	37	
22.00	29	
23.00	32	Total 438

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A recent hearing held by the Council saw the police update these statistics as part of their evidence, so the information is available to the public.

The updated statistic provided to the Council in December 2022 shows an increase in alcohol-related crime in Talbot Ward from 438 incidents (2019 data) to 693 (2022 data), this is a 58% increase.

Ward	No. of Alcohol related offences	% of Total
Claremont Ward	852	24%
Talbot Ward	693	19%
Bloomfield Ward	541	15%
Waterloo Ward	195	5%
Brunswick Ward	160	4%
Clifton Ward	123	3%
Warbreck Ward	113	3%
Park Ward	107	3%
Victoria Ward	98	3%
Marion Ward	85	2%
Ingthorpe Ward	80	2%
Tyldesley Ward	76	2%
Hawes Side Ward	69	2%
Norbreck Ward	64	2%
Squires Gate Ward	53	1%
Greenlands Ward	49	1%
Highfield Ward	46	1%
Layton Ward	45	1%
Stanley Ward	42	1%
Anchorsholme Ward	36	1%
Bispham Ward	34	1%
-	12	0%
Grand Total	3,573	100%

Whilst these statistics do not present the whole picture, they demonstrate that alcohol-related crime in Talbot Ward is increasing rather decreasing and from an operator's perspective I have noticed that our customer base is more argumentative, and unreasonable and displays of extreme violence such as the threat with a knife mentioned earlier are no longer a rare occurrence, especially in the earlier hours of the morning.

The Cumulative Impact Policy shifts the burden to the applicant to produce an application

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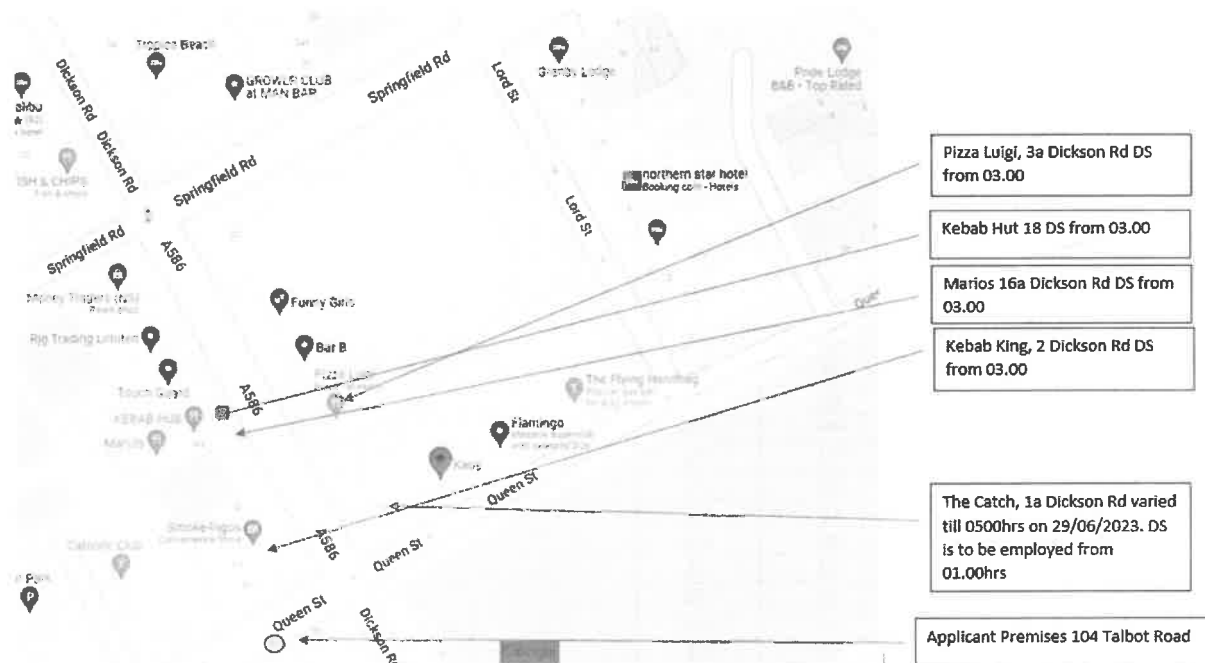
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that will not have a significant impact on the cumulative impact already being experienced in the area. The Licensing Policy suggests this should be done through the operating schedule and risk assessment process if it is used.

My representative viewed the original application on the 2nd of August 2023 at the Council's offices, it was clear it has been drafted by someone with limited knowledge of the regulations, the policy or statutory guidance. The first attempt would appear to fall short of offering an operating style that could be considered robust. For example, the original application makes no mention of the employment of door staff at all. If they had researched the area at all and the conditions in place at nearby premises, they would have understood the importance of such a measure.



Whilst the premises are located on Talbot Road, it is at the top end close to the junction of Dickson Road, which will add to the problems already being experienced in the area.

I understand that there is a school of thought that having more premises in a troublesome area can dilute problems and spread them over a wider area but the whole concept of cumulative impact is the Council have already declared that this area is suffering from a concentration of premises and to add more to an area is likely to be problematic. At that point, an applicant is

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expected to set out why his or her operation will not have a significant impact on the issues already occurring.

The timings requested on the application are much the same as all the other takeaways in the area and seek a terminal hour of 5 am, the layout of the premises is approximately 10m x 4.7m and no fixed seating is indicated on the plan. Therefore, all the issues that occur at every other takeaway in the area are likely to occur here.

Prepared by

Mark Marshall FCILEX
Director

A handwritten signature in black ink, appearing to read 'M. Marshall'.

3rd August 2023

