

SUTHARSHINI LTD

Applicant

-and-

CHIEF CONSTABLE OF HUMBERSIDE POLICE

Respondent

**STATEMENT OF
ALISON KATE SAXBY**

Introduction

1. My name is Alison Saxby and I am a Licensing Officer in the Licensing Section of the Humberside Police based at Grimsby Police Station, Victoria Street, Grimsby. I cover the county of North East Lincolnshire. I am under the direction and control of the Chief Constable of Humberside Police ('the Chief Constable'). My duties include consideration of the impact of crime and disorder and the Chief Constable's response to licensing matters.
2. I have been a Licensing Officer since April 2018, prior to which I was a Finance Assistant for 4 years, a Public Service Officer for 2 years and an Anti Social Behaviour Researcher for 2 ½ years. I have worked for Humberside Police for 15 years, and I am familiar with problems of alcohol related crime and disorder in both in my current and previous roles. I hold a BIIAB Alcohol Practitioner qualification.
3. SUTHARSHINI LTD is the applicant for the Premises Licence applied for under Part 3 of the Licensing Act 2003 ('the Act') in respect of the premises known as Todays, situated at 93 Alexandra Road, Grimsby, North East Lincolnshire, DN31 1RF.

4. I make this statement in support of the Chief Constable's Objection to the application for a new Premises Licence under Section 18 of the Licensing Act 2003 and is in addition to those papers already served on the authority. The information in this statement is either within my personal knowledge or is taken from files maintained by the Chief Constable.

Background

5. The Applicant applied for a New Premises Licence on 11th July 2025, in accordance with Section 17 of the Licensing Act 2003. This was through an agent – JL Licensing.
6. The premises in question is situated in a primarily residential area, in Grimsby Town Centre.
7. The premises licence application requests the sale of alcohol Monday to Sunday 0600 to 0000 and Late Night Refreshment Monday to Sunday 2300 to 0000.

History

8. On 11th July 2025, the police received an application for a new premises licence.
9. During the application process, a range of factors are assessed to determine the necessary measures required to ensure the premises conditions uphold the 4 Licensing Objectives. This assessment includes evaluating the location of the premises, identifying any issues in the area and at the premises, any crime-related concerns and any unique issues specific to the area that need to be addressed. This also includes taking into account any initiatives in

the area to reduce specific problems. Each application is reviewed individually and considered on its own merits.

10. Part of the process includes liaising with the local policing team to discuss any concerns with the application or with approving the application, using their local knowledge of the area.
11. Humberside Police do not have an issue with the application being approved, and through liaison with the applicant's agent, a number of conditions have been agreed by both parties. **(EXHIBIT AKS/01)**
12. There are 3 conditions that have not been agreed on. These are:
 - Spirits with an ABV above 20% will be kept behind the counter or other Police approved secure display. Spirits will only be displayed, offered or sold in bottles no less than 35cl
 - The premise will not display, offer, or sell any beers, lagers, ciders or pre-mixed spirit drinks with an ABV in excess of 6.5 %.
 - All beer, lager and cider displayed for sale in cans will only be sold in minimum packs of 4 cans, there will be no sales of individual cans of beer, lager or cider.
13. Discussions with the Licensing Consultant, who has then spoken to the applicant have stated that they wish to sell high strength alcohol, and in fact premises in the area do sell this.
14. Whilst it is confirmed that some nearby premises do sell high strength alcohol, these licences were granted many years ago. Under the Licensing Act, conditions attached to an existing licence cannot be amended without a valid and legally justified reason.
15. What the Licensing Act does allow for, however, is for conditions to be placed on new applications in response to specific concerns in an

area. These additional conditions, which will be outlined in Annex 2, are designed to ensure the Licensing Objectives are upheld. These are over and above the Mandatory Conditions in Annex 1. A standard set of conditions are not applied across all licences, instead conditions are premises specific, and we ensure they are proportionate for the applicant and enforceable for the authorities, in order for the safe and compliant operation of a premises licence, and also to ensure it is futureproofed.

16. When determining appropriate conditions for a premises, the following factors are considered:

- i. The nature of the business
- ii. The proposed hours of operation
- iii. The location of the premises, including the surrounding area
- iv. The details provided in the operating schedule in the application
- v. The local issues and priorities
- vi. Any relevant recent or ongoing initiatives
- vii. Crime and disorder issues in the area
- viii. Potential impact on local residents
- ix. Anything further of relevance specific to the application

17. When this application was received, there were no concerns with the application being submitted, the applicant or the DPS. The proposed operating hours were also not queried as other premises operate until the same time in residential areas with no issues reported. An operating schedule was provided, however there were several changes that were necessary due to some of the proposed conditions being duplicated having been covered by legislation or Mandatory (Annex 1) conditions. Other conditions were not considered to be sufficient and required strengthening to fully support the Licensing Objectives.

18. Agreements were gained between Humberside Police and JL Licensing for the majority of the conditions, however agreement could not be reached on 3 conditions:

- Spirits with an ABV above 20% will be kept behind the counter or other Police approved secure display. Spirits will only be displayed, offered or sold in bottles no less than 35cl
- The premise will not display, offer, or sell any beers, lagers, ciders or pre-mixed spirit drinks with an ABV in excess of 6.5%.
- All beer, lager and cider displayed for sale in cans will only be sold in minimum packs of 4 cans, there will be no sales of individual cans of beer, lager or cider.

19. These conditions were requested and deemed necessary due to the premises' proximity to Grimsby Town Centre, and in an area where street drinkers are known to use as a through road to get to the town centre. It is known that the street drinkers like to purchase high-strength alcohol to then consume in the centre, such as in St James Square, which can then contribute to incidents of anti-social behaviour or criminal activity. This is not just happening in the daytime – they also congregate in an evening, which can have an impact on the Night Time Economy area of town. Additionally, Minors have also been provided with high strength alcohol that has been purchased from these premises.

20. Visits have been conducted to premises both in the Town centre and on the outskirts of the area to advise of these concerns by Police Licensing Officers, Council Licensing Officers and local Neighbourhood officers. Warning letters have been issued, minor variations have been submitted after being requested by Humberside Police where it has been proven that street drinkers have been served, and premises have taken positive action to try to

reduce these sales to create a safe environment for all who attend the area. **(EXHIBIT AKS/02)**

21. Two current initiatives in the area that are supported by Humberside Police, North East Lincolnshire Council and other partner agencies include Operation Mastery and West Marsh Safer Streets. **(EXHIBIT AKS/03)**
22. Safer Streets is a government initiative aimed at reducing crime and increasing public confidence. Its objective is to halve knife crime and violence against women and girls, however it also emphasises reducing town centre criminality, shop theft, street crime and anti-social behaviour.
23. It is a long-term partnership-based approach working to ensure lasting change in communities.
24. Operation Mastery has been active in Grimsby Town Centre since early 2024, and continues to operate successfully. In August 2025, the operation received further funding from the Police and Crime Commissioner (PCC) to extend the work further into the West Marsh Ward Area.
25. Operation Mastery has been highlighted by the National Police Chiefs Council (NPCC) as an early adoption of Safer Streets.
26. The Local Police Inspector for the area has stated that the proposed conditions align with and support this initiative to ensure we continue to build resilience within the community and reduce crime.
27. Due to the ongoing work, the Inspector has agreed that by applying these conditions to the licence now will ensure communities (including partnerships) can continue to tackle alcohol related anti-social behaviour and prevent any associated violence. This also includes safeguarding those purchasing the alcohol as they may find themselves becoming victims of crime.

28. The Inspectors statement further states that the alcohol being sold at the premises may be detrimental to the objectives of the Safer Streets initiative, specifically reducing crime. So far, the operation has seen positive results:

- Anti-social behaviour has reduced by 14%
- Alcohol related ASB has reduced by 51%
- All crime has reduced by 5% between 2023 and 2025
- Violence leading to injury has reduced by 23%
- Sanctions (out-of-court disposals, rehabilitation, charges, summons etc) have increased by 40%

29. Further information provided by the local Sergeant explains that there are a core group of people that drink frequently in the town centre, which attracts further people to join. This contributes to causing public nuisance and disorder, and on occasion, violent crime. **(EXHIBIT AKS/04)**

30. Whilst he has been working, along with his team and seen by CCTV operators, this group usually consume high-strength alcohol, which they have regularly been seen to leave the town centre to where other stores are located, and return to the town centre with further high-strength alcohol. It is believed that they are purchasing it from these stores on the outskirts. Work is ongoing with premises on the stepped approach in order to reduce these opportunities.

31. By applying the conditions, this aligns with the problem-solving profile to prevent anti-social behaviour, crime and disorder, by making it more difficult for those who wish to purchase these items and cause problems.

32. The initiative is also supported by local councillors. Councillor Wheatley has stated that herself and the second West Marsh Councillor, have been actively working to combat the impact that

litter caused by street drinkers is having in the area and has expressed concern regarding the premises opening. **(EXHIBIT AKS/05)**

33. It is her belief that the contested conditions are entirely reasonable and will demonstrate a willingness to trade in a responsible community minded manner. She further explains that by not agreeing them is against the aims and objectives of the council and the community.
34. Cllr Wheatley highlights that there is a lot of investment in the town centre, including new leisure facilities being built to attract families into the town centre. She has expressed concern that the sales of single cans contributes to antisocial behaviour and the potential for underage drinking, which is against the welcoming environment that is being aimed for.
35. Recently, North East Lincolnshire Council have committed to becoming a Marmot Place. This adopts the principles developed by Professor Sir Michael Marmot and the UCL Institute of Health Equity. Public Health Management explain that Marmot Places are local areas committed to reducing health inequalities by applying principles outlined in the research on the social detriments of health. This approach promotes fairer opportunities for health and wellbeing through targeted interventions, community engagement and system wide collaboration. The main aim of being a Marmot Place is to ensure that every resident can live a longer, healthier life, regardless of their socioeconomic background. **(EXHIBIT AKS/06)**
36. Public Health continue to explain that one area of concern within Marmot Place initiatives is the consumption of high-strength beers and ciders, particularly among individuals experiencing homelessness, addiction or mental health challenges. It is explained that due to the products being cheap and widely available it can

exacerbate existing vulnerabilities and contribute to cycles of harm, hospitalisation and disengagement from support services

37. One part of what Public Health Teams within Marmot Place are working towards is to engage retailers and licensing authorities to explore local restrictions or voluntary agreements around the sale of high-strength products. This is to aim to create safer environments and reduce preventable harm.
38. The Marmot Place approach also encourages partnership working, including with retailers, to address the disproportionate harm caused by high-strength alcohol.
39. Public health further explain that the availability of cheap, high-strength beers, ciders and spirits are linked to increased rates of liver disease, hospital admissions and anti-social behaviour. By allowing the high-strength alcohol to be sold, it is accessible to those that may be classed as vulnerable, including young people, those with an alcohol dependence and people in lower socioeconomic groups.
40. Public health experts argue that reducing the affordability and availability of alcohol is one of the most effective strategies to reduce harm. This is linked to the Marmot Place principles. Without these conditions, this is undermining what is trying to be achieved in the area. It allows alcohol to be purchased cheaply, encourages impulse/opportunistic drinking and makes it easier to drink in public spaces, contributing to anti-social behaviour and community disruption
41. Humberside Police are not seeking to stop the sale of alcohol in the premises. A large number of conditions have been agreed to allow this to happen. Whilst the majority of customers will no doubt be purchasing the alcohol to consume in their own home or in a responsible way, the concern is the impact of another shop selling

the desirable alcohol to those that will consume alcohol in areas that partnerships are trying to keep clear of this behaviour. The majority of customers are not attracted to the alcohol that we are seeking to remove from the premises.

42. Mention has been made during discussions regarding the cost of living and people's spending habits being different. This has been taken into account as one of the proposed conditions is to only stock spirits with an ABV of 20% or over in 35cl bottles or over. This condition is usually considered at 70cl, but due to the area, taking into account the residents, disposable income and the potential impact, it has been deemed reasonable to allow slightly smaller bottles for sale. However below this will be attractive to street drinkers and underage.
43. It has also been requested to consider allowing high strength alcohol to be sold in a minimum of 2 cans. This is not an acceptable proposition as some drinkers will purchase 2 cans at a time. It is still contributing to the issues in the area that Partnerships are trying to eradicate. It also allows the temptation to override the system and sell in the single cans. If items are prepacked in a pack of four, it is easier to manage to ensure the packs are not split. It also makes it more difficult for people to conceal items.
44. There is also concern that those that purchase the high-strength alcohol may congregate near to the premises or cause unnecessary nuisance for the residents in the area by attending frequently.
45. The high strength caffeinated spirit mix drinks, such as Dragon Soop at 7.5% are desirable to minors, so it is proposed these are included in the condition in order to Protect Children from Harm. One of the new developments close to the location is a Youth Zone. This is for those aged 8-19, which is extended to those aged 25 with additional needs. This is developed to be a collaborative charity, including the private sector, the local authority, young people and the community

so there is a safe and inclusive space to attend. This is situated at the top of Alexandra Road, the same road that the shop is on.
(EXHIBIT AKS/07)

46. Young people will be attending the Youth Zone 7 days a week. They will be attending from all over the area, and they do not need to be exposed to persons consuming high strength alcohol in the street. They do not need to be in fear of persons acting in an antisocial manner due to drinking high strength alcohol, or fear becoming a victim of crime for the same reasons. They also do not need to have the opportunity to purchase this or have it purchased for them. They should be able to attend the premises, and return home, safely.

Submissions

47. It is clear from the information provided, the ongoing partnership working, the investment in the area and the reduction in incidents from the ongoing initiatives in the area that a lot of work is being successfully completed to reduce crime and anti-social behaviour. It is believed that by allowing the premises to sell single cans that are attractive to the street drinkers and underage (who may be provided it by others, causing a proxy sale) will undermine the Prevention of Crime and Disorder.
48. Police, Councillors, Public Health, North East Lincolnshire council and other agencies are all working together to reduce the impact of alcohol in public areas and are continuing to apply for and successfully receive funding to assist with this. By allowing the licence to be granted without the proposed conditions will undermine the ongoing work by the partnership. We need to ensure these measures are put in place now to work with the partners, and not wait until further issues are raised about the concerns about high-strength alcohol – the issue is already present, and we need to do what we can to prevent the issue escalating. Work has been, and

still is, ongoing in the area to try and reduce the issues caused by sales of these items, when the information is provided. The issue is when the information is not provided as to where the sales are from, but the impact of the sales is becoming more detrimental to the area. By preventing it at this stage will show that consideration has been shown to the locality, and that it isn't just an economic decision to make money by the applicant.

49. The view of the Chief Constable is that given the proximity to the town centre, the issues currently known about in the vicinity of the premises, the level of ongoing partnership work in the area that has reduced crime, the ongoing investment to ensure a family friendly level of incidents/crime in the area, that the premises licence should be granted with the previously agreed conditions and the 3 contested conditions. This is the only way that we can ensure the four licensing objectives will not be undermined.

50. The Chief Constable requests that the Licensing Committee consider the points made within this statement and asks that they approve with all requested conditions. If this cannot be achieved, it is requested that the application is refused.

I believe the contents of this statement to be true.

Signed:
Mrs Alison Saxby

Dated: 22/08/2025.....