

MINUTES OF THE SPECIAL LICENSING SUB COMMITTEE MEETING HELD ON THURSDAY, 20TH MAY, 2021, 7.00 - 9.00 PM

PRESENT: Councillor Gina Adamou (Chair), Councillor Viv Ross, and Councillor Yvonne Say.

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings and this information was noted.

2. APOLOGIES FOR ABSENCE

There were no apologies for absence.

3. URGENT BUSINESS

It was noted that, it being a special meeting of the Sub-Committee, under Part Four, Section B, Paragraph 17 of the Council's Constitution, no other business would be considered at the meeting.

4. DECLARATIONS OF INTEREST

There were no declarations of interest.

5. SUMMARY OF PROCEDURE

The Chair provided a summary of the procedure for the meeting.

6. APPLICATION FOR A NEW PREMISES LICENCE AT GETIR UK LTD, UNIT 5, 2 OVERBURY ROAD, TOTTENHAM, LONDON N15

At the outset of the item, Chris Knight (Licensing Agent) stated that he had not received a copy of the representation from Public Health and from two of the residents. The Licensing Officer noted that all of the representations had been included in the agenda pack. It was confirmed that the representations had been received within the required time limits and so were valid for consideration.

Daliah Barrett, Licensing Officer, introduced the report which presented an application for a new premises licence for GETIR UK LTD, Unit 5, 2 Overbury Road, Tottenham, London, N15. It was explained that the application requested a licence for the sale of alcohol off the premises through online sales only from 0000 to 0000 hours on Monday-Sunday; the site would not be open to the public but deliveries could be made at any time and there would be 24 hour access for staff and delivery couriers.

The Licensing Officer explained that the applicant had accepted the conditions proposed by the Licensing Authority, Police, and Trading Standards and that these were set out in full in the report. It was stated that other representations had been received from Public Health and four other persons, including Councillor Barbara Blake, and these were set out in full in the report. It was also noted that the relevant laws and guidance were listed in the report, from section 3 onwards.

It was noted that the premises were located in an industrial, mixed use unit. The Licensing Officer was satisfied that the application process had been followed, including all the necessary advertisement requirements.

It was explained that the Committee could grant the licence subject to mandatory and other conditions, exclude from the scope of the licence any of the licensable activities to which the licence related, refuse to specify a person in the licence as the premises supervisor, or reject the application. It was added that the licensing authority's determination of the application was subject to a 21 day appeal period.

In response to questions from the Committee, it was noted that:

- The representations from the Licensing Authority, Police, and Trading Standards had been withdrawn following the agreement of proposed conditions. The remaining representations were from Public Health and four other persons, including one from Cllr Barbara Blake.

There were no questions from objectors.

The Committee received representations from objectors:

- Councillor Barbara Blake noted that she would not read out the submissions in full but that she would like to highlight the key concerns of local residents. She explained that there was anti-social behaviour in the area which included street drinking. She stated that there had been an increase in traffic in the area, along Hermitage Road and Vale Road in particular, and vehicles often went through the traffic barrier which was a safety concern. Councillor Barbara Blake noted that the applicant had a comprehensive training programme but it was not clear that this training informed motorcyclists not to drive through the barriers.
- She stated that the applicant would 'endeavour' to use electric or non-motorised vehicles for deliveries but that, due to the speed of expansion, this may not be possible. Councillor Barbara Blake noted that the lack of timescales or guarantees was concerning and that, although she wanted to support businesses, the applicant had not contacted her to discuss the local issues for residents. She highlighted that she did not want the concerns about the sale of alcohol, street drinking, and underage drinking to be dismissed as these were significant issues in Haringey. She stated that the applicant had not explained when the increased deliveries would happen or when alcohol was more likely to be sold. She added that there were concerns that the sale of alcohol between 11pm-6am would cause nuisance to residents as there would be additional bikes and alcohol sales at any time.
- It was noted that there would be a Challenge 25 condition but it was felt that this was very difficult in practice and there were concerns about how this would be enforced. Councillor Barbara Blake stated that local residents were concerned

about this application and that the proposals did not go far enough in providing reassurance and protection; she asked the Committee to oppose the application.

- Peter Simon, Hermitage New River Residents' Association Chair, noted that residents lived amongst a warehouse district and encouraged business in the area but they did not feel that a 24 hour licence for the sale of alcohol was appropriate in a highly residential area. It was explained that the access to the site was through the residential areas and that the delivery drivers did not avoid the barriers in these areas. It was stated that the scooters used for deliveries were noisy and that this noise was amplified in residential streets.
- It was commented that residents frequently raised issues relating to drinking, drugs, and anti-social behaviour on the street. It was added that warehouse parties were an issue locally and that the area currently had a blanket anti-social behaviour order.
- Maria Ahmad, Public Health, explained that they had concerns in relation to three of the licensing objectives as set out in the report. It was noted that Haringey had 356 adults in the alcohol treatment service and that there had been 79 alcohol-specific hospital admissions in 2019-20, with approximately 25% of ambulance callouts between 11pm-5am. It was explained that there had been an increase in drinking during the Covid-19 pandemic and that online delivery services were a convenient way for problem drinkers and young people to access alcohol easily.
- It was stated that the applicant's business would be able to deliver alcohol quickly and without any limit and it was considered that this would have a negative impact on the most vulnerable in the area. It was added that there had been an increase in alcohol delivery sales and that a number of drinking issues were linked to this.
- It was noted that there was no 24 hour online delivery service for the sale of alcohol in the area and that Public Health did not support the application for a 24 hour licence. It was explained that Public Health would like to see the hours restricted to 12am (midnight). It was also requested the delivery drivers received additional training, particularly in relation to public nuisance. It was accepted that the business model was that of an online supermarket but that Public Health felt that a reduction of hours and additional training for delivery drivers was required in order to promote the licensing objectives.

In response to questions from the Committee, the following responses were provided:

- It was understood that the company was currently trading and that the sale of alcohol might not lead to a significant increase in moped movements. Peter Simon was not sure if the applicant had already started trading from the site but noted that Getir scooter traffic had increased significantly in the last six weeks.
- It was noted that, in accordance with the proposed conditions, the applicant would only be permitted to deliver to an address and it was enquired how this would lead to increased street drinking. Peter Simon acknowledged that he did not know the full details of the processes but stated that it was often easy to get around those sorts of restrictions; it was suggested that it might be possible to have something delivered to a doorstep or front garden.
- It was confirmed that residents did not have any issues with the applicant in particular and would not oppose the licence application for the sale of alcohol if it was reduced to 6am-11pm.

- Public Health stated that they did not want to prevent businesses operating but that they were concerned about the level of alcohol consumption and noise, particularly as Haringey sold the most litres of alcohol per adult in London. They confirmed that their representations would be withdrawn if the hours for the sale of alcohol were reduced.
- In relation to the warehouse parties mentioned, Peter Simon stated that there were a number of warehouses in the area that provided six to eight bedroom dwellings. They were likely house parties but they were loud and disturbed residents and there were concerns that the easy delivery of alcohol at any time would increase these issues.
- It was confirmed that there were proposed conditions which would require all deliveries to be made to a residential or business address. It was added that the verification process took place at the point of sale and also upon delivery.
- It was not believed that there were any other premises in the area with a licence for 24 hour off sales.

The representatives for the applicant, Chris Knight (Licensing Agent), Anna Cosgrave (Head of UK Counsel for Getir), Sofia Koleva (Regional Manager for Getir), Ali Al-Mehdar (Site Manager for Getir). Chris Knight explained that the Getir business and operating model was quite established in the marketplace and in London and it involved selling convenience items from a number of small delivery hubs. It was commented that the hubs were small and belonged to Getir, the staff and drivers were provided by Getir, and everything was managed by senior Getir staff; the process was controlled from beginning to end and third party contractors were not used. It was noted that customers needed to create an account with the Getir app, which involved verification of address and age, and orders were made through that account.

Chris Nixon noted that some questions had been raised in relation to training. It was explained that every member of staff went through a comprehensive training regimen; this included road safety where drivers' suitability to represent the company was tested by a team of trainers whose sole job was to provide training and refresher training. It was noted that drivers undertook rigorous training and testing using Getir vehicles before they were permitted to undertake deliveries. It was stated that this went above and beyond the training programmes of other delivery companies.

Chris Nixon noted that the applicant would be adopting a Challenge 25 policy and that the training provided for staff included testing with refresher training at intervals. Staff were trained on the proper handing over of alcohol to an adult at the designated address and, if it could not be ascertained that the recipient was over 18 or if the recipient was drunk, the alcohol sale would be refused and the products would be returned to the store.

It was noted that the applicant was a convenience item seller and that alcohol was a small but important part of their business model. The concerns raised were acknowledged but Chris Nixon stated that the busiest hours for the business were typically 5pm-9pm and the biggest product line in the later evenings was milk; as such, there was not a significant flow of traffic overnight. It was added that the applicant was an experienced operator and that, in previous applications, the concerns of late night nuisance relating to the business had not materialised. It was explained that the alcohol product lines were a small fraction of the business and the

main items were food, seasoning, small electronics, and toiletries; the applicant wanted to be able to deliver all products at all times to suit their customer base.

In relation to public safety, Chris Nixon argued that, where these sorts of business models were operated well, they helped to keep people safe. It was noted that the applicant had a verification process and did not deliver to parties, streets, or public locations. Chris Nixon stated that the application was for the sale of alcohol and licensing law required that the end customer was not underage or drunk; it was commented that, otherwise, the delivery of products was outside of the Licensing Sub-Committee decision. The concerns raised by Public Health were noted but it was highlighted that the applicant was an alcohol delivery company and there would be no sale of alcohol on the premises. It was noted that deliveries were made to customers' homes where they were permitted to do as they liked.

Chris Nixon explained that the applicant already delivered groceries and that the sale of alcohol within these deliveries would not change the business model or undermine the licensing objectives. It was stated that this was a new application and there was no evidential basis that there would be any issues. It was noted that the licensing regime was permissive and that the applicant had put measures in place to minimise the impact on the licensing objectives. It was added that there was training for delivery drivers and that each driver was monitored through a Getir app. The driving of delivery drivers was monitored centrally and individuals were inspected when any issues were raised. It was also noted that the licensable activity of the sale of alcohol did not relate to traffic and this was not a consideration in licensing law.

Chris Nixon stated that the applicant had only recently found out that there was a representation from Public Health but, following some discussions, a reduced list of conditions had been agreed as follows:

1. No super strength beer, lager or ciders above 6.5% ABV (alcohol by volume) or above shall be stocked or sold at the premises (except for premium specialist beers).
2. Alcohol shall be stored securely, when on premises, at all times.
3. If the recipient of a delivery of alcohol appears under 25 years of age, recognised photographic identification will be requested before any intoxicating liquor is handed over. Acceptable proof of age shall include identification bearing the customers photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport. *Chris Nixon noted that this was a replication of the Challenge 25 condition.*
4. No spirits shall be sold with an ABV (alcohol by volume) greater than 65%.
5. All staff engaged in the sale or supply of alcohol on the premises shall have received training in relation to the protection of children from harm (including under-age sales), how to recognise drunkenness and the duty not to serve drunk persons. Refresher training shall be carried out at least every six months. *It was noted that this condition was set out in the application but there had been an amendment from 12 months to six months.*
6. The company website/app will request confirmation of age on order booking, when an order for alcohol is made.

In response to questions from the Committee, the following responses were provided:

- It was noted that alcohol would not be delivered to any customers who were drunk or underage but it was enquired how this would be ascertained and whether the refusal record would include the name and address of the customer. Chris Nixon stated that the refusal log would include these details.
- It was noted that the Getir website currently stated that deliveries were from 8am-12am (midnight) and that objectors had suggested that they would accept the application if the hours were reduced. It was enquired whether the applicant would consider reducing the hours requested for the sale of alcohol to 8am-12am (midnight). Chris Nixon explained that the website times were specific to a customer's location and that the opening times for specific sites were sometimes subject to change. It was stated that the applicant would not agree to a reduction and did not consider that there was a justified reason to do so because the objections related to the operating hours rather than the sale of alcohol.
- It was enquired whether the applicant would use a testing regime in relation to underage customers. Chris Nixon explained that only the Police were permitted to conduct test purchasing with young people. It was noted that the applicant had an internal testing regime and monitoring measures.
- In response to a question about why the applicant had applied for 24 hour sales of alcohol, Chris Nixon explained that this was the applicant's market. It was noted that the applicant supplied small convenience packages at any time, primarily for late night workers, and they wanted to be able to cater for all sales. It was added that overnight deliveries and alcohol sales were a small but important market for the applicant. Chris Nixon also stated that there were measures in place to ensure responsible retailing, including volunteered and agreed conditions, and he believed that no other company in the local area had the same degree of training and control as the applicant.

In response to questions from objectors, the following responses were provided:

- It was suggested that the applicant was experienced as an operator and it was enquired how long they had been operating in the UK. Anna Cosgrave explained that Getir had been operating globally for about five years and in the UK since November 2020.
- It was stated that the applicant would not deliver to parties and it was enquired whether a delivery would be made to a resident of a warehouse whilst they were having a party. Chris Nixon explained that this was a difficult question as it was the retailer's role to ensure a responsible sale but not to decide whether a party was appropriate. It was noted that a sale of alcohol could be refused if a customer was drunk.
- There were some reports from residents that Getir delivery drivers were not abiding by traffic laws, including a recent incident where a driver had ignored a no entry sign, and confirmation was sought that the training programme included road traffic signage. Chris Nixon stated that no evidence of this was provided in the papers and that this should not be considered. He noted that drivers received extensive training and that he would be able to discuss any issues with residents after the hearing.
- In relation to a question about the delivery of alcohol, Chris Nixon stated that the transportation of the alcohol was not covered in licensing law. The licence to sell alcohol related to the premises and the retailer was required to ensure a responsible sale of alcohol but the delivery was incidental.

- It was noted that the applicant would 'endeavour' to use quieter bikes but there were concerns that this would be secondary to the expansion of the business. Chris Nixon noted that the applicant aimed to operate with only non-motorised vehicles but that there was often insufficient supply to meet demand. He explained that 'endeavour' meant that the applicant would use non-motorised vehicles in the first instance but that it may not be possible to use these exclusively. It was added that, if motorised vehicles were used, they would be used during the day and e-scooters would be reserved for late night trading.
- It was confirmed that, when drivers were not making deliveries, they would be located inside the premises, as shown on the plan in the agenda pack.
- It was enquired how long the training programme was and Chris Nixon explained that drivers were shadowed by a trainer and were put through, effectively, another driving test. It was noted that the drivers did not always use motorised vehicles but that all drivers undertook the same training regimen. It was stated that there was a very high standard of training and that a failure to meet the required standards could result in dismissal. It was added that compliance with the traffic rules was monitored through the app by a dedicated team who would take action if there were any issues. It was confirmed that drivers were trained and tested over a two week period.
- It was noted that, at this site, the maximum capacity of drivers would not likely exceed 13. It was added that this would be during peak hours, typically 5pm-9pm, and that there would normally be one or two drivers.
- It was noted that Sofia Koleva, Regional Manager, would be appointed as the Designated Premises Supervisor (DPS) initially. However, once the store was operational, the DPS would be transferred to the site manager who would have control of the site and would not be responsible for multiple sites.
- The Licensing Officer clarified that, following an earlier question about the refusals record, the conditions required the date and time of the refusal and the member of staff refusing a sale but did not require the name and address of the customer to be noted. It was enquired whether the applicant would agree to include the name and address of the customer. Chris Nixon stated that the applicant did not want this condition to be amended.
- The Licensing Officer noted the written materials suggested that third party deliveries may be used but that the applicant's representatives had stated that no third party deliveries would be used. Chris Nixon noted that, if a driver was not directly employed, they would still be trained and tested to the same level as a fully employed driver. It was clarified that third party deliveries would be sourced from a pool of approved and trained drivers and this was not similar to other delivery companies.

The objectors were invited to summarise. Councillor Barbara Blake noted that the application would extend the possible drinking hours in the area. She stated that heavy drinkers were attracted to the night time economy and the Institute of Alcohol Studies found that night time economy drinkers consumed more alcohol in general and drank above average for their age group. It was commented that a significant number of people in the borough had alcohol dependency issues and that this should be taken into consideration when an organisation proposed to sell alcohol that could be easily delivered to people's homes. It was stated that, although no photo evidence was submitted, delivery drivers were ignoring safety barriers in residential areas and there were concerns that the applicant's extensive training programme was not

effective. Councillor Barbara Blake considered that granting the proposed licence to sell alcohol overnight, despite the conditions, would result in problems for residents living in the area and the Committee was asked to oppose the application.

Maria Ahmad, Public Health, noted that there were concerns that the application would make it very convenient for the most vulnerable communities to access alcohol quickly and in unlimited amounts. It was considered that this would have a negative impact and Public Health was proposing two additional conditions relating to the reduction in hours for the sale of alcohol and additional training for delivery drivers to uphold the licensing objectives.

In summary, the representatives of the applicant stated that the concerns discussed were often raised by local residents whenever a new operation was started and that the applicant took reasonable and proportionate measures which meant that none of these concerns had materialised so far. Chris Nixon stated that a reduction of hours had been suggested but that the applicant did not agree that this was justified or evidenced as appropriate. It was commented that delivery was incidental and that alcohol would only be delivered to homes. The difficulties faced by residents were appreciated and it was acknowledged that there may be issues but it was stated that the responsibility for retailers was for the sale, rather than the consumption, of alcohol. The applicant's representatives stated that the application should be judged on its own merits and the applicant considered that it was proportionate and fair with the proposed conditions.

At 8.35pm, the Committee adjourned to consider the application.

RESOLVED

The Special Licensing Sub-Committee carefully considered the application for a new premises licence at GETIR UK LTD, Unit 5, 2 Overbury Road, Tottenham, London, N15. In considering the application, the Committee took account of the London Borough of Haringey's Statement of Licensing Policy, the Licensing Act 2003, the Licensing Act 2003 section 182 Guidance, the report pack, and the written and verbal representations made at the hearing by the applicant and their representatives and by objectors.

Having considered the application and heard from all the parties, the Committee decided to grant the application for a new premises licence with the following conditions:

Operating times:

Supply of Alcohol for delivery only:

Monday to Sunday 0000 to 0000 hours **online sales only**

Supply of alcohol **OFF** the premises

Hours open to the public:

No public access

The Committee imposed the following conditions:

1. No members of the public will be allowed on the premises.
2. Drivers will await deliveries by waiting in an internal section of the premises until such time as a delivery is ordered. Staff on site will ensure that no excessive noise is created by the drivers when leaving, entering or smoking outside the Premises.
3. A digital CCTV system must be installed in the premises complying with the following criteria:
 - (a) Cameras must be sited to observe the entrance doors from both inside and outside.
 - (b) Cameras on the entrances must capture full frame shots of the heads and shoulders of all people entering the premises i.e. capable of identification.
 - (c) Provide a linked record of the date, time of any image.
 - (d) Provide good quality images - colour during opening times.
 - (e) Have a monitor to review images and recorded quality.
 - (f) Be regularly maintained to ensure continuous quality of image capture and retention.
 - (g) Member of staff trained in operating CCTV at venue.
 - (h) Digital images must be kept for 31 days. The equipment must have a suitable export method, e.g. CD/DVD writer so that Police can make an evidential copy of the data they require. Copies must be available within a reasonable time to Police on request.
4. An incident log shall be kept at the premises, it will be in a hardback durable format handwritten at the time of the incident or as near to as is reasonable and made available on request to the Police, which will record the following:
 - (a) All crimes reported to the venue.
 - (b) Any complaints received.
 - (c) Any incidents of disorder.
 - (d) Any faults in the CCTV system.
 - (e) Any visit by a relevant authority or emergency service.
5. The premises will be maintained in a safe manner at all times.
6. All exits will be kept unobstructed, easy to open and clearly signed.
7. Notices will be displayed asking staff to leave the premises quietly and to have respect for local residents.
8. Delivery of alcohol will be refused whereby the driver considers the person receiving the delivery to be under the influence of alcohol or drugs.
9. No alcohol will be supplied to the public at the premises.

10. All sales of alcohol for consumption off the premises shall be in sealed containers only and shall not be consumed on the premises.
11. When a delivery is to be carried out by an employed driver:
 - (a) A Challenge 25 scheme shall be operated, whereby if supply of alcohol is to any person who appears to be under the age of 25 years of age, they will be required to produce on request an item which meets the mandatory age verification requirement and is either a:
 - (i) Proof of age card bearing the PASS Hologram;
 - (ii) Photocard driving licence;
 - (iii) Passport; or
 - (iv) Ministry of Defence Identity Card
 - (b) All staff engaged in the sale or supply of alcohol on the premises shall have received training in relation to the protection of children from harm (including under-age sales), how to recognise drunkenness and the duty not to serve drunk persons. Refresher training shall be carried out at least every six months.
 - (c) Training records shall be kept on the premises (or otherwise be accessible on the premises) for a minimum of 12 months and made immediately available to police, trading standards or licensing authority staff upon reasonable request.
 - (d) A refusals record shall be maintained at the premises which details all refusals to supply alcohol. Each entry shall, as a minimum, record the date and time of the refusal and the name of the staff member refusing the supply.
12. Notwithstanding Conditions above; where third party couriers are employed for deliveries these third parties shall maintain their own Challenge 25 Policies & age verification training.
13. When using third party couriers, all consignments of alcohol will be dispatched through reputable couriers only who have robust age verification systems in place.
14. In order that residents are not caused nuisance or disturbed by any delivery service providers:
 - (a) Drivers do not congregate on residential roads.
 - (b) Toilet facilities are provided for drivers at the premises.
 - (c) All delivery services are provided in a courteous, safe and respectful manner.
 - (d) All deliveries are provided in accordance with the law on road use, parking and licensing.
15. A record of orders shall be kept which shall include the customer's name & address. In accordance with data protection regulations, this log shall be made available to Police and local authority officers on request.
16. The delivery of alcohol shall be made only to a residential or business address, which the customer uses in a residential or official capacity. The delivery of alcohol

shall not be made or completed to a person in a public place (street corner, park, bus stop, etc).

17. All customers shall be contacted in writing (e.g. e-mail or text) to notify them that an order has been placed, with the date, and if possible approximate time, of the expected delivery.
18. Couriers delivering orders shall keep record require a signature from the recipient upon delivery in a form that can be captured and fed back to the licence holder. The only exception to this requirement is due to social distancing measures.
19. If the recipient of a delivery of alcohol appears under 25 years of age, recognised photographic identification will be requested before any intoxicating liquor is handed over. Acceptable proof of age shall include identification bearing the customers photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.
20. No super-strength beer, lagers or ciders over 6.5% ABV (alcohol by volume) or above shall be stocked or sold at the Premises (except for premium specialist beers).
21. Alcohol shall be stored securely, when on premises, at all times.
22. No spirits shall be sold with ABV (alcohol by volume) greater than 65%.
23. The company website/ app will request confirmation of age on order booking, when an order for alcohol is made.

Reasons

The Committee gave serious consideration to the concerns raised by the objectors. The Committee sympathised with the objectors but considered that there was insufficient evidence to demonstrate that the new premises licence application would undermine the promotion of the licensing objectives. It was noted that it would not be fair to attribute existing issues in the area to this application and there was no compelling evidence that this application in particular would result in public nuisance or public health issues.

The Committee acknowledged the concerns raised by Public Health. It was noted that the issues raised, although serious, related to the wider area and local issues in general. It was considered that the concerns were not directly linked to the applicant or the application in question and there was no evidence that the licensable activities applied for would undermine the licensing objectives. The Committee also noted that the issues raised in the representation from Public Health might be given more weight when the premises were the point of sale to the public and/ or the point of consumption of alcohol but that, in this case, there would be no public access to the premises and deliveries would only be made to residential or business addresses.

The Committee considered whether it would be appropriate and proportionate to reduce the hours for the sale of alcohol within the application, which had been suggested by a number of the objectors. The Committee acknowledged that the applicant had agreed to a number of conditions, including no public access to the premises, arrangements for delivery drivers when not making deliveries, a requirement that deliveries were made to home or business addresses only, and verification requirements for age and address at the point of registration and delivery. It was also noted that the business supplied groceries online with the option to purchase alcohol and that, although the business could operate 24 hours a day, the primary period of operation was normally between 5pm and 9pm and there were generally few deliveries throughout the night. It was also commented that issues raised in relation to deliveries were not specific to the sale of alcohol as they would also apply to the sale of groceries which was not a licensable activity. The Committee was satisfied that the application and the proposed conditions would promote the licensing objectives and considered that there were insufficient grounds which demonstrated that it would be appropriate and proportionate to seek a reduction in the hours for the sale of alcohol.

Appeal Rights

This decision is open to appeal to the Magistrates Court within the period of 21 days beginning on the day upon which the appellant is notified of the decision. This decision does not take effect until the end of the appeal period or, in the event that an appeal has been lodged, until the appeal is dispensed with.

CHAIR: Councillor Gina Adamou

Signed by Chair

Date