

[Redacted]

**From:** Ryan Hollings  
**Sent:** 14 November 2023 11:37  
**To:** Licensing; [Redacted]  
**Subject:** RE: Licensing Review - PRE1307 - Billa Mini Market, 90 Villers Street, Wolverhampton, WV2 4NX  
**Attachments:** PH Reps 14.11.23 - Billa Mini Market.docx

Sensitivity: PROTECT

Dear Licensing,

I write on behalf of Public Health as a Responsible Authority to submit supporting formal representations to the above application under the licensing objectives of

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

Public Health have very serious concerns regarding: prohibited items (single can sales of Super Strength Alcohol with an ABV 6.5% and over) were for sale (on multiple occasions), breaching current licence conditions. There is clear evidence to suggest that appropriate training has not been provided and those staff not being aware of incident/refusal book location.

As a Responsible Authority we would expect any business licensed premises, to act responsibly at all times and promote the key objectives of the Licensing Act 2003.

With breaches of the licensing conditions reported, Public Health is not reassured that the business is operating in adherence to the Licensing Act and therefore supports the Licensing Authority request to review the current licence.

I, or a suitable representative from Public Health, will be available to attend the hearing and provide further information as required.

Kind regards

Ryan

Ryan Hollings  
 Senior Public Health Specialist  
 Public Health

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██████████  
Licensing & Compliance Officer  
City of Wolverhampton Council

14<sup>th</sup> November 2023

Dear ██████████,

**Licensing Review - PRE1307 - Billa Mini Market, 90 Villers Street,  
Wolverhampton, WV2 4NX**

Thank you for your email dated 25<sup>th</sup> October 2023 in reference to the request made by the Licensing Authority to review the premises licence for Billa Mini Market.

I have reviewed the documentation put forward by the Licensing Authority and would support the request to review the premises licence under the licensing objectives of:

- The Prevention of Crime and Disorder
- Public Safety
- The Prevention of Public Nuisance
- The Protection of Children from Harm

The evidence put forward by the Licensing Authority is very concerning, prohibited items (single can sales of Super Strength Alcohol with an ABV 6.5% and over) were for sale (multiple occasions). In addition, no training (refresher) within last 6 months alongside no reported training in relation to challenge 25 and registered DPS confirming Billa Mini Market was not their shop.

The reported instances are shocking and shows a clear neglect of the licensing act 2003, not upholding the four licensing objectives, this is further exacerbated by the fact that no refusal book being provided upon initial request, in addition sale of age restricted items outside of the agreed hours of sale/supply of alcohol off the premises.

Super Strength alcohol sales are most commonly associated with street drinkers, although street drinkers do not aim to cause nuisance, research has identified repeated problems caused by street drinkers such as anti-social behaviour, low level crimes such as theft and littering. [street-drinking-supporting-evidence-and-best-practice.pdf \(apccs.police.uk\)](https://www.apccs.police.uk/street-drinking-supporting-evidence-and-best-practice.pdf)

It is the view of Public Health that any licensee who is not actively promoting the licensing objectives should be subject to review, particularly in view of the complex issues facing the area.

Yours sincerely

**Ryan Hollings**

Senior Public Health Specialist

E-mail: [REDACTED]