

APPENDIX C

Exeter City Council – Licensing Act 2003

REPRESENTATION FORM

This representation is made about the premises to be licensed as detailed below:

Your full name	[REDACTED]
The name of the organisation / body you represent (if appropriate)	[REDACTED]
Postal address	[REDACTED]
Email address	[REDACTED]
Contact telephone number	[REDACTED]

Name of the premises you are making a representation about	Newham Stores (Exeter) Limited
Address of the premises you are making a representation about	12/13 South Street, Exeter, EX1 1DZ

Your representation must relate to one of the four Licensing Objectives

<i>Licensing Objective</i>	<i>Yes Or No</i>	<i>Please detail the evidence supporting your representation or the reason for your representation. Please use separate sheets if necessary</i>
To prevent crime and disorder	Yes	<p>My observation of the nighttime economy in the city centre, Queen Street, High Street, Cathedral Yard, Gandy Street etc. is that excessive overnight alcohol consumption frequently results in impaired judgment, vandalism, smashed bottles, littering, public urination and violent assault – both at, and when people return from, their gathering places / parties as well as increased incidences of domestic violence. Domestic violence is particularly harmful to women, and results in chronic trauma to the children who witness it which aside from the human cost may lead to long term significant burden upon public services. ias.org.uk research shows that alcohol is a factor in the majority of nighttime and weekend violent incidents.</p> <p>The extension of the hours and the convenience of delivery (with groceries) from this prominent and well known city centre location will I believe make the problem worse. People who were drinking earlier in the evening may be hungry and want to order groceries, either because the earlier drinking displaced eating or because of elapsed time since the last meal, and the consequent ordering of groceries is likely to be a driver for opportunistic ancillary overnight purchase of more alcohol due to impaired judgement. Convenience of home delivery will overcome natural deterrence to excess consumption of alcohol due to weather and lack of effort motivation.</p> <p>Although delivery may be available from other establishments, this would require some research and initiative, whereas from personal experience as a parent, and from observing behaviours in the shop itself, the Newham Stores central location is a well understood and well known brand that particularly and specifically attracts underage, street attached, vulnerable and alcohol addicted people and the convenience and primacy of its</p>

		<p>prominent city centre location adds to the likelihood of inappropriate alcohol consumption during hours that will add to and compound the existing problems.</p>
<p>Public safety</p>	<p>Yes</p>	<p>My observation of the nighttime economy in the city centre, Queen Street, High Street, Cathedral Yard, Gandy Street etc. is that excessive overnight alcohol consumption frequently results in impaired judgment, vandalism, smashed bottles, littering, public urination and violent assault – both at, and when people return from, their gathering places / parties as well as increased incidences of domestic violence. Domestic violence is particularly harmful to women, and results in chronic trauma to the children who witness it which aside from the human cost may lead to long term significant burden upon public services. ias.org.uk research shows that alcohol is a factor in the majority of nighttime and weekend violent incidents.</p> <p>The extension of the hours and the convenience of delivery (with groceries) from this prominent and well known city centre location will I believe make the problem worse. People who were drinking earlier in the evening may be hungry and want to order groceries, either because the earlier drinking displaced eating or because of elapsed time since the last meal, and the consequent ordering of groceries is likely to be a driver for opportunistic ancillary overnight purchase of more alcohol due to impaired judgement. Convenience of home delivery will overcome natural deterrence to excess consumption of alcohol due to weather and lack of effort motivation.</p> <p>Although delivery may be available from other establishments, this would require some research and initiative, whereas from personal experience as a parent, and from observing behaviours in the shop itself, the Newham Stores central location is a well understood and well known brand that particularly and specifically attracts underage, street attached, vulnerable and alcohol addicted people and the convenience and primacy of its prominent city centre location adds to the likelihood of inappropriate alcohol consumption during hours that will add to and compound the existing problems.</p>
<p>To prevent public nuisance</p>	<p>Yes</p>	<p>My observation of the nighttime economy in the city centre, Queen Street, High Street, Cathedral Yard, Gandy Street etc. is that excessive overnight alcohol consumption frequently results in impaired judgment, vandalism, smashed bottles, littering, public urination and violent assault – both at, and when people return from, their gathering places / parties as well as increased incidences of domestic violence. Domestic violence is particularly harmful to women, and results in chronic trauma to the children who witness it which aside from the human cost may lead to long term significant burden upon public services. ias.org.uk research shows that alcohol is a factor in the majority of nighttime and weekend violent incidents.</p> <p>The extension of the hours and the convenience of delivery (with groceries) from this prominent and well known city centre location will I believe make the problem worse. People who were drinking earlier in the evening may be hungry and want to order groceries, either because the earlier drinking displaced eating or because</p>

		<p>of elapsed time since the last meal, and the consequent ordering of groceries is likely to be a driver for opportunistic ancillary overnight purchase of more alcohol due to impaired judgement. Convenience of home delivery will overcome natural deterrence to excess consumption of alcohol due to weather and lack of effort motivation.</p> <p>Although delivery may be available from other establishments, this would require some research and initiative, whereas from personal experience as a parent, and from observing behaviours in the shop itself, the Newham Stores central location is a well understood and well known brand that particularly and specifically attracts underage, street attached, vulnerable and alcohol addicted people and the convenience and primacy of its prominent city centre location adds to the likelihood of inappropriate alcohol consumption during hours that will add to and compound the existing problems.</p>
<p>To protect children from harm</p>	<p>Yes</p>	<p>As a parent I have had repeated experience of young people visiting this specific premises late at night to obtain alcohol. This results in them being disorderly, becoming ill, vomiting and being hung over, which is disadvantageous to their goals and wellbeing, and creates nighttime disturbance with banging doors and prolongs drunken socialising beyond its natural limits. The extension of the hours and the convenience of delivery (with groceries) will I believe make the problem worse. Purchasing of groceries by young people who have not eaten because they have been drinking alcohol earlier, is actually likely to be a driver for opportunistic ancillary overnight purchase of more alcohol due to opportunity, suggestibility and impaired judgement. Convenience of home delivery will overcome weather and effort motivation deterrence. My observation of the nighttime economy in the city centre, Queen Street, High Street, Cathedral Yard, Gandy Street etc. is that excessive overnight alcohol consumption frequently results in impaired judgment, vandalism, smashed bottles, littering, public urination and violent assault when people return from their gathering places / parties. The extension of the hours and the convenience of delivery (with groceries) will I believe make the problem worse. People who were drinking earlier in the evening may be hungry and want to order groceries, either because the earlier drinking displaced eating or because of elapsed time since the last meal, and the consequent ordering of groceries is likely to be a driver for opportunistic ancillary overnight purchase of more alcohol due to impaired judgement. Convenience of home delivery will overcome weather and effort motivation deterrence.</p> <p>Although delivery may be available from other establishments, this requires some research whereas from personal experience as a parent, and from observing behaviours in the shop itself, the Newham Stores central location attracts young and alcohol addicted people and the convenience adds to the likelihood of inappropriate alcohol consumption.</p> <p>It is also likely that younger children in the home will be subject to disrupted sleep and exposure to noise and domestic violence as a result of the particular likelihood of</p>

	overnight alcohol purchase from this establishment due to its prominent location and already well known and established identity as a place for purchase of late night alcohol.
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If you are making a representation against a new application or full variation, please suggest any conditions that could be added to the licence to remedy your representation (or other suggestions you would like the Licensing Sub Committee to take into account).	I considered this, but I do believe lack of resources to enforce specific licensing conditions would render such variations of condition ineffective.
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Signed: [REDACTED]

Date: 5 February 2026

Please see notes on reverse

NOTES

If you are making a representation in relation to a 'new' premises or a 'full variation' please read the following notes:

1. If you do make a representation you will be able to attend a meeting of the Licensing Authority's Committee and any subsequent appeal proceeding. If you do not attend, the Committee will consider any representations that you have made in your absence.
2. This form must be returned within the statutory period of 28 days following submission of a valid application to the Licensing Authority.
3. You may make a representation wherever you live in relation to the premises but your representation must be relevant.
4. Representations can only relate to the four licensing objectives.
5. Your representation will be passed to the applicant, to allow them the opportunity of addressing your concerns. Your representations will be published in the report available to the Licensing Committee, which will be publicly available.
6. Please return this form when completed to:

Licensing, Exeter City Council, Civic Centre, Paris Street, Exeter EX1 1JN

Alternatively, you can email it to licensing.team@exeter.gov.uk.

If you are making a representation in relation to a 'minor variation' please read the following notes:

1. If you do make a representation, you should be aware that the application will be determined by an Officer. There will be no hearing and there is no right of appeal.
2. This form must be returned within the statutory period of 10 working days following submission of a valid application to the Licensing Authority.

3. You may make a representation wherever you live in relation to the premises but your representation must be relevant.
4. Representations can only relate to the four licensing objectives.
5. Please return this form when completed to:

Licensing, Exeter City Council, Civic Centre, Paris Street, Exeter EX1 1JN

Alternatively, you can email it to licensing.team@exeter.gov.uk.

Objection: Newham Stores

From [REDACTED]

Date Fri 06-Feb-26 10:00

To Licensing Team <licensing.team@exeter.gov.uk>

Cc [REDACTED]

Dear team

Licensing Objection: Newham Stores (Exeter) Limited, Proposed Off-Sales of Alcohol 2am–6am (delivery collection)

[REDACTED] object to this application on the grounds that extending off-sales of alcohol between 2am and 6am is likely to undermine the following Exeter City Council licensing objectives of :

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

The proposed operating model—late-night off-sales for delivery riders—creates significant and predictable risks to community safety, particularly for women and children, and increases the likelihood of alcohol-related domestic abuse and night-time disorder.

1. Prevention of Crime and Disorder

Extending the time and increasing availability of alcohol throughout the night is contrary to achieving this licensing objective. Off-sales purchased after pubs close are a known driver of continuation of drinking at home, escalation of intoxication and increased likelihood of violent incidents. Analysis of COVID-era restrictions (on-trade closures vs off-trade availability) shows that reducing certain forms of availability changes patterns of alcohol-related violence, indicating that availability and timing of sales are important levers for violence prevention [Oxford Academic](#).

Late-night availability of alcohol enables continuation of drinking after returning home, escalation of conflict during the highest-risk hours (11pm–3am, extending into early morning), increased severity of violence in the home. Allowing alcohol sales until 6am directly increases the likelihood of alcohol-fuelled harm to women, who are disproportionately the victims of domestic abuse.

Late-night off-sales are strongly associated with increased violence and disorder. Research consistently shows that alcohol availability during late-night hours increases the frequency and severity of alcohol-related violence. The majority of violent incidents in England and Wales occur at night and are alcohol-related—around 61% of night-time violent incidents (10pm–6am) and 62% of weekend violent incidents are linked to alcohol. [ias.org.uk](#)

A 2023 Institute of Alcohol Studies and University of Liverpool study found that when pubs and bars were closed during COVID-19 lockdowns, alcohol sold via off-trade (shops and supermarkets) remained a crucial driver of violent incidents — including domestic violence. Public Health England related academic work shows that alcohol increases both the occurrence and the severity of domestic violence, particularly in home-drinking contexts. [Home drinking during and post-COVID-19: Why the silence on domestic violence? - The University of Liverpool Repository](#)

2. Public Safety

While we do not know where the deliveries will be, anecdotally - having spoken to delivery bikers, we do know that it is just as likely to be a very local delivery, as it to be delivered elsewhere in the city. So it cannot be proven that there won't be a very local impact in the city centre, nor that those who are drinking will do so at home and stay at home.

International and UK studies consistently show that areas with dense licensed premises and extended late-night opening have higher levels of violence and disorder in town and city centres. [JRep - Nottingham Trent University ias.org.uk](#). The store is in the Exeter Cumulative Impact Zone where there are a variety of sales models which significantly increases the availability of alcohol in this area which has suffered from serious ASB, and violence against women at night.

Concentrated late-night availability of alcohol, on or off sales, is strongly associated with higher levels of assault, disorder, and police demand. The tight implementation of licensing policies is recommended by the College of Policing in order to reduce violence against women: [Reducing violence in the night-time economy | College of Policing](#)

Delivery removes safeguards, unlike in-person sales, delivery bypasses face-to-face assessment of intoxication, enables alcohol to be supplied to individuals already drunk and removes the ability to refuse service based on behaviour or vulnerability. This undermines public safety and increases the risk of harm.

3. Prevention of Public Nuisance

Delivery-based collection increases the risk of public nuisance and impact on resident amenity:

- Riders arriving at 2–6am increase the likelihood of noise e.g. door slamming, engine noise etc, disturbance, and may congregate outside the premises, there are flats opposite the shop.
- There is no effective way to evidence who has purchased and who ultimately consumes the alcohol.
- Alcohol can be delivered to unsafe or unsuitable environments, including homes where domestic abuse is already a risk factor.

This sales model is fundamentally different from traditional off-sales, where customers are physically present and age-verified.

4. Protection of Children from Harm

Children are directly harmed by alcohol-related domestic abuse. Alcohol misuse is a factor in around 40% of cases involving children in need. Evidence shows a substantial share of domestic violence is alcohol-related, and changes in alcohol availability—including late-night off-sales—affect patterns of violence in the home, with direct consequences for children's safety and wellbeing." [Oxford Academic](#)

Late-night drinking increases the risks to children including exposure to domestic violence, emotional

and psychological harm, unsafe home environments, neglect due to parental intoxication. Allowing alcohol to be purchased at 2–6am may increase the likelihood that children will be present during or affected by alcohol-fuelled conflict.

We therefore request refusal of the application in full.

best wishes

[REDACTED]

[REDACTED]

Household support information for support bills and essentials: [Household Support Fund - Household Support Fund 7 - Exeter City Council](#)

Promoted by [REDACTED] c/o Exeter City Council, Paris Street, Exeter. EX11JN