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Licensing Team  
Environmental Health  
Arun District Council  
West Sussex  
BN17 5LF

30<sup>th</sup> March 2023

Dear Sir or Madam,

**Re: Justin Retail Ltd T/A Premier, 220 - 222 Chichester Road, Bersted, Bognor Regis, West Sussex, PO21 5BE**

The West Sussex County Council (WSCC) Public Health Directorate wishes to support the application by Trading Standards to review the licence of: Justin Retail Ltd T/A Premier, 220 – 222, Chichester Road, Bersted, Bognor Regis, West Sussex, PO21 5BE

The Public Health Directorate concurs that the Licensing Objectives of:

- (1) The Prevention of Crime and Disorder
- (4) The Protection of Children from Harm

are not being promoted, as demonstrated by the illegal sale of alcohol to a person under the age of 18, as part of a Trading Standards 'test purchase' operation.

The sale of alcohol to children is of extreme concern, considering the strong evidence demonstrating the harms caused by alcohol to children and young people. It is noted that Trading Standards had recently given verbal and written advice about the sale of age restricted products to the member of staff who sold the alcohol to the underage Trading Standards volunteer. This advice had not been acted upon. Which indicates a lack of effective training at the premises and suggests a disregard for the law. The WSCC Public Health Directorate is aware of breaches of licence at another premises where the same Designated Premises Supervisor (DPS) is responsible. Therefore, the WSCC Public Health Directorate supports the recommendations made in the representation by Trading Standards.

**Supporting evidence**

**Harms, caused by alcohol, to children and young people**

In 2009, the Chief Medical Officer of England published official guidance on alcohol aimed specifically at children and young people<sup>1</sup>. It recommends that an alcohol-free childhood is the healthiest and best option<sup>2</sup>. The guidance is based on a body of evidence that alcohol consumption during any stage of childhood can have a harmful effect on a child's development.

<sup>1</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294441/Alcohol_consumption_by_children_and_young_people.pdf)

<sup>2</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/294441/Alcohol_consumption_by_children_and_young_people.pdf)

Furthermore, alcohol use during the teenage years is related to a wide range of health and social problems, and young people who begin drinking before the age of 15 are more likely to experience problems related to their alcohol use<sup>3</sup>. Drinking at a young age, and particularly heavy or regular drinking, can result in physical or mental health problems, impair brain development, and put children at risk of alcohol-related accident or injury. More broadly it is also associated with missing or falling behind at school, violent and antisocial behaviour, and unsafe sexual behaviour<sup>4</sup>.

According to guidance provided on NHS.UK, the health risks associated with drinking alcohol before the age of 18 are as follows:

- Drinking alcohol can affect the normal development of vital organs and functions in children under 18, including the brain, liver, bones and hormones.
- Beginning to drink before age 14 is associated with increased health risks, including alcohol-related injuries, involvement in violence, and suicidal thoughts and attempts.
- Drinking at an early age is also associated with risky behaviour, such as violence, having more sexual partners, pregnancy, using drugs, employment problems and drink driving<sup>5</sup>.

### **National prevalence of alcohol use by children and young people**

National data indicates that alcohol remains the substance most commonly used by young people. In a 2021 national survey, 40% of pupils said they had ever had an alcoholic drink<sup>6</sup>, a figure which may be broadly applied to the West Sussex population of young people.

### **Local alcohol-related hospital admissions among children and young people**

Each year in West Sussex, there are more than 60 alcohol-specific hospital admissions (where the hospital admission is wholly attributable to alcohol) among under 18s. The rate of these admissions in West Sussex (36.9 per 100,000 population, 2018/19-2020/21) is significantly higher than that rate for England overall (29.3 per 100,000)<sup>7</sup>.

The comparable rate for Arun district is 57.7 admissions per 100,000 under 18s. This is the highest rate out of the seven district and boroughs in West Sussex. Furthermore, Arun has the third highest rate of any local authority in the South East region and is also significantly higher than the national rate.

### **Under 18s using specialist alcohol treatment services in West Sussex**

The latest data for 2020/2021 shows that 40% of under 18s in the West Sussex specialist children and young people's drug and alcohol service were receiving treatment for alcohol-related substance misuse.

Given the harm caused to children and young people by alcohol in West Sussex and high rate of alcohol harm in young people in Arun District, it is especially disappointing to note that staff at Justin Retail sold alcohol to a child. It is clear that, although Challenge 25 signage is displayed on the premises, it is not being adhered to. This suggests, at best, a lack of effective staff training or, at worst, a disregard for the responsibility to promote the licensing objectives.

In summary, the WSCC Public Health Directorate supports the suggestion made by Trading Standards for the Licensing Committee to consider revocation of the alcohol licence. At a minimum

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<sup>3</sup> [Alcohol consumption by children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/alcohol-consumption-by-children-and-young-people)

<sup>4</sup> [Part 5: Alcohol drinking prevalence and consumption - NHS Digital](https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/)

<sup>5</sup> <https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/>

<sup>6</sup> [Part 5: Alcohol drinking prevalence and consumption - NHS Digital](https://www.nhs.uk/common-health-questions/childrens-health/should-my-child-drink-alcohol/)

<sup>7</sup> [Local Alcohol Profiles for England - Data - OHID \(phe.org.uk\)](https://phe.org.uk/data/local-alcohol-profiles-for-england)

we would respectfully suggest that the committee consider removal of the current DPS and suspension of the alcohol licence for a period sufficient to allow for a new DPS to be put in place and for full staff re-training in age-restricted sales, Challenge 25 and refusing alcohol sales to underage children. We believe these measures to be necessary, proportionate and reasonable in order to prevent further crime and disorder and to protect children from harm.

Yours sincerely,



Holly Yandall  
Public Health Lead for Alcohol and Drugs

**On behalf of the Director of Public Health**