

Responsible Authority:	Haringey Public Health, London Borough of Haringey
Date:	03/06/2019
Name:	Maria Ahmad, Health Improvement Officer Marlene D'Aguilar, Health In All Policies Officer
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Public Health representation relation to: DOWN LANE STUDIOS, ASHLEY HOUSE, ASHLEY ROAD, LONDON, N17 9LZ

Supply of Alcohol

Monday to Tuesday	0900 to 2330 hours
Wednesday	0900 to 0245 hours
Thursday	0900 to 0345 hours
Friday to Saturday	0900 to 0545 hours
Sunday	0900 to 2345 hours

For the consumption ON the premises

Hours Open to Public:

Monday to Tuesday	0800 to 0000 hours
Wednesday	0800 to 0315 hours
Thursday	0800 to 0415 hours
Friday to Saturday	0800 to 0615 hours
Sunday	0800 to 0015 hours

I as a representative of the Director of Public Health act as the responsible authority under the Licensing Act 2003 and would like to make a representation regarding the application for a new premises license at: DOWN LANE STUDIOS, ASHLEY HOUSE, ASHLEY ROAD, LONDON, N17 9LZ

Public Health has concerns under the following licensing objectives:

- Public Safety
- Crime and disorder
- Protecting children from harm

Haringey: Alcohol and Health

Tackling alcohol misuse is key to achieving the outcomes in Haringey's Health and Wellbeing Strategy: giving every child the best start in life, reducing the gap in life expectancy between the east and west of the borough and improving mental health and well being. Part of achieving these involves community safety efforts to tackle alcohol crime and anti-social behaviour and ensuring health considerations are taken into account in any licensing decisions. We want to create a culture that prevents problem drinking from starting and provides help for people early on should they be struggling.

Haringey experiences some of the greatest levels of alcohol-related problems in London and the harm due to alcohol is a growing concern. In the five-year period of 2009/10 – 2014/15, alcohol related hospital admissions increased by 38% with the local cost of these admissions now estimated to be £7.5 million annually. During the same time period, the (DSR) rate of admissions per Haringey person also increased for

both men and women, 31% and 26% respectively. Across the borough, there are currently over 800 licensed premises for the sale and supply of alcohol and this figure continues to rise, with some areas of high-level clustering. Evidence shows that an increased number of alcohol outlets results in significant increases in alcohol consumption and alcohol-related harm (including injury, violence and medical harm). Antisocial behaviour associated with street drinking has been recognised as a concern in Haringey. Problems identified include; litter, noise, urination and intimidation all of which have a detrimental impact to the quality of life for residents.

Though many factors are known to contribute to the above, the licensing committee has direct influence over two: density of licensed premises and trading hours.

Local Context of the Premises

The premise is located on Ashley Road, a busy residential and commercial area of Haringey which will soon be subject to further residential developments as part of the Tottenham Hale area regeneration. On Ashley Road two proposals are underway; 183 new homes and another 98 new homes. There are three schools within 500m of the premises and the premise is located 0.2miles away from the Tottenham Hale station. Please see <https://www.talktottenhamhale.co.uk/> for Tottenham Hale Area Plan

The premises is also located less than 1km from the alcohol recovery service on Bruce Grove, aiming to rehabilitate those with drug and alcohol addiction.

The Tottenham Hale ward is an area with a high burden of crime and it is ranked the fourth highest of all Haringey wards. From April 2018 to March 2019, there were 3563-recorded crimes, of which 790 (22.17%) anti-social behaviour and 787 (22.09%) violence and sexual offences (Police UK, 2019). Tottenham Hale is ranked fourth most deprived ward in Haringey and this is amongst the 20% most deprived neighbourhoods in the country (London datastore, 2015). It is generally, where we have saturation and health conditions, which may be exacerbated by alcohol and lead to further health inequality.

Public Safety

There is already high availability of alcohol within LSOA of the premises; 3 off-licenses and 13 on-licenses of which 5 are open after midnight. The proportion of on-licences per 1000 residents in LSOA (3.6) is higher than the Haringey average (2.0).

The density of licensed premises and hours and days of sale are known to influence consumption and harm. There is a growing body of evidence that an increase number of alcohol outlets results in significant increases in both alcohol consumption and alcohol-related harm. There are also many studies that demonstrate changes in hours or days of trading can have a significant impact on volume of alcohol consumed and rates of alcohol related problems.¹

In 2017/2018 the LSOA ranked within the first quintile (of 144 LSOAs that comprise the borough) for alcohol related ambulance callouts. The proportion of all alcohol related callouts are between 11pm and 5am in LSOA is 69.7%.

¹ Popova, S., Giesbrecht, N., Bekmuradov, D. And Patra, J. Hours and days of sale and density of alcohol outlets: impact on alcohol consumption and damage: a systematic review. Alcohol and alcoholism 2009;44(5):500-516

Crime and Disorder

On or near Ashley Road there were 25 crimes in the past year (April 2018 to March 2019), of which 12 (48%) were anti-social behaviour and 3 (12%) were violent or sexual offences (Police.UK). These two types of crime are associated with alcohol intake and pose a risk to the safety of the general public including children. Alcohol is known to exacerbate the likelihood of wide range of criminal offences including anti-social behaviour, night-time violence and domestic abuse offences (GLA datastore, 2016).

In 2015, out of all 19 wards Tottenham Hale ranked for the following: British Transport Police Violence (2nd) and TFL Alcohol Related Disturbance (4th). There were 42 ambulance-recorded assaults within 500m of the premises from November 2017 October 2018 (SafeStats Ambulance data, Bullseye Tool 2019). This highlights Tottenham Hale has an issue with public transport alcohol related incidents.

Furthermore, the impact of the sale of high strength beers, lagers and ciders are 6.5% alcohol by volume (ABV) and above is having an adverse effect across Haringey. The increase and easy availability of these, one of the most harmful forms of alcohol, is related to an increase in street drinking and ASB.

Protecting Children from Harm

There are three schools within 500m of the premises, including an all-through school and two nurseries. (SafeStats London, 2016). The premise is located 0.1 miles from Down Lane Park, which is open 24 hours. To the south of the park lies a children's playground, a mini BMX track and a new natural play area, which is popular among families and school children. Furthermore, there will be an increase in the population of young people in the area due to the regeneration in the area; this should also be considered in the application.

Alcohol related ambulance callouts totalled 33 in 2017/2018, of which 4 involved a young person under 18 years of age within the LSOA.

In 2017/18, near Ashley road opposite the premise there were 18 callouts of incidents involving patients under the age of 26 occurring within 500m of the premises (SaferStats Bullseye Tool, 2019).

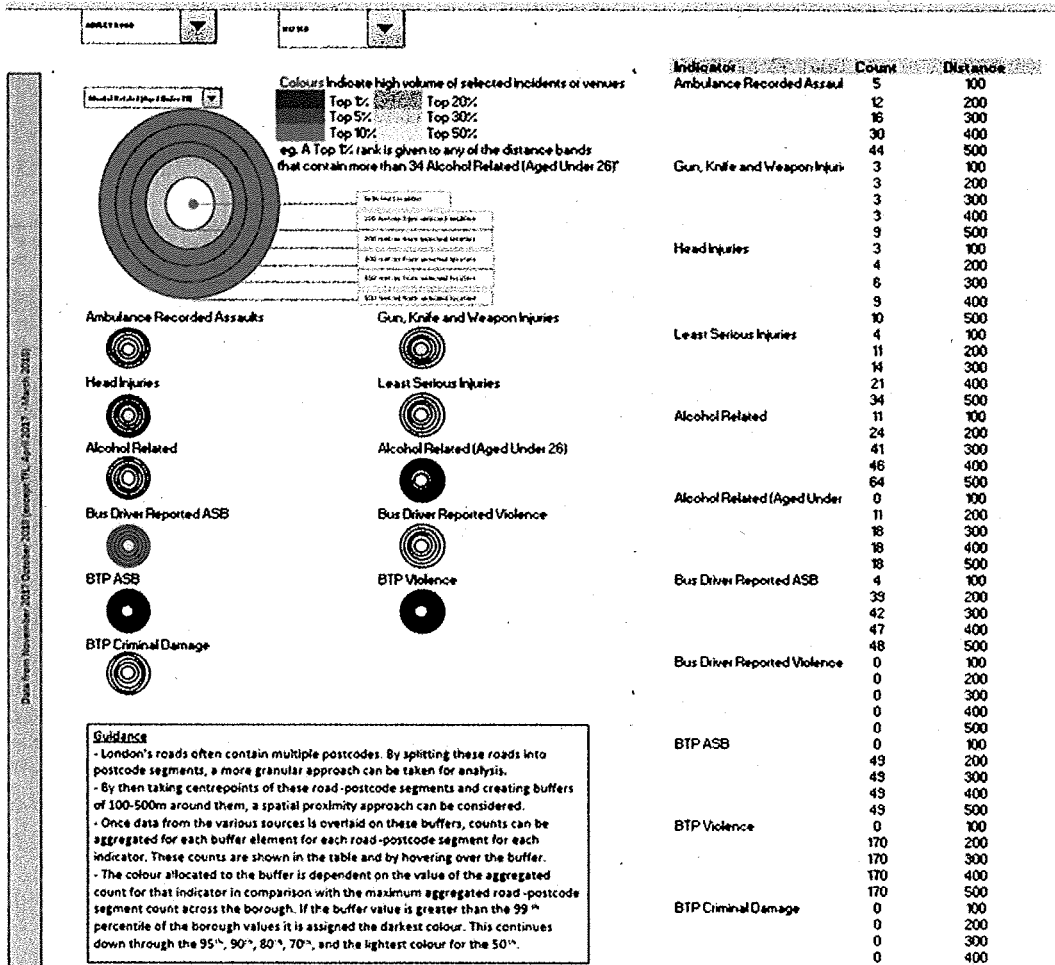


Figure 1: Bulls eye analysis showing ranked volume of incidents or venues within 500 meter radius of post code opposite the premises (SafeStats, 2016)

Recommendation

After reviewing the application, we believe that due consideration had not been given to the licensing objectives of crime and disorder, public safety and protecting children from harm. The application is limited in content and fails to demonstrate how they will not add to this level of impact of alcohol on the licensing objectives and deal with various issues that will soon prevail in the regeneration area.

Public Health therefore recommends that the application is only to be granted if subject to:

1. Reduction of hours to what the Haringey Statement of Licensing (2016 – 2021) recommends. Alcohol sales are restricted to midnight on Friday and Saturday and 23.30 Sunday – Thursday.
2. Further assessment and consultation into the long-term impact of this business as this area will have new residents and businesses over time as it is located in a regeneration area.
3. Inclusion of the following additional conditions to the license to minimise any potential harm:

- High strength alcohol sale restriction: no super-strength beer, lagers or ciders of 6.5% ABV (alcohol by volume) or above shall be sold at the premises
 - No promotion of super-strength alcohol (above 6.5% ABV) and single cans (i.e. buy one get one free) OR there shall be no promotional sales of alcohol at the premises where alcohol is sold at a price lower than that at which the same or similar alcoholic drinks are sold, or usually sold, on the premises
- There shall be no self-service of spirits on the premises.

(Challenge 25 policy, CCTV, refusals book and training requirements as per application)