

Responsible Authority:	Haringey Public Health, London Borough of Haringey
Date:	25/06/2019
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Public Health representation relation to: SEVEN BROTHERS MINIMARKET, 72-76 HIGH ROAD, TOTTENHAM, LONDON, N15 6JU	
Supply of Alcohol	
Monday to Sunday	24 hours
For consumption OFF the premises	
Opening Hours	
Monday to Sunday	24 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: SEVEN BROTHERS MINIMARKET, 72-76 HIGH ROAD, TOTTENHAM, LONDON, N15 6JU

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 the High Road, near a residential area of Haringey. It is located 0.2 miles away from South Tottenham station and less than 0.1 mile away from a primary school.

The Seven Sisters ward is an area with a high burden of crime. From May 2018 to April 2019, there were 2118-recorded crimes, of which 430 (20.30%) anti-social behaviour and 466 (22.00%) violence and sexual offences (Police UK, 2019).

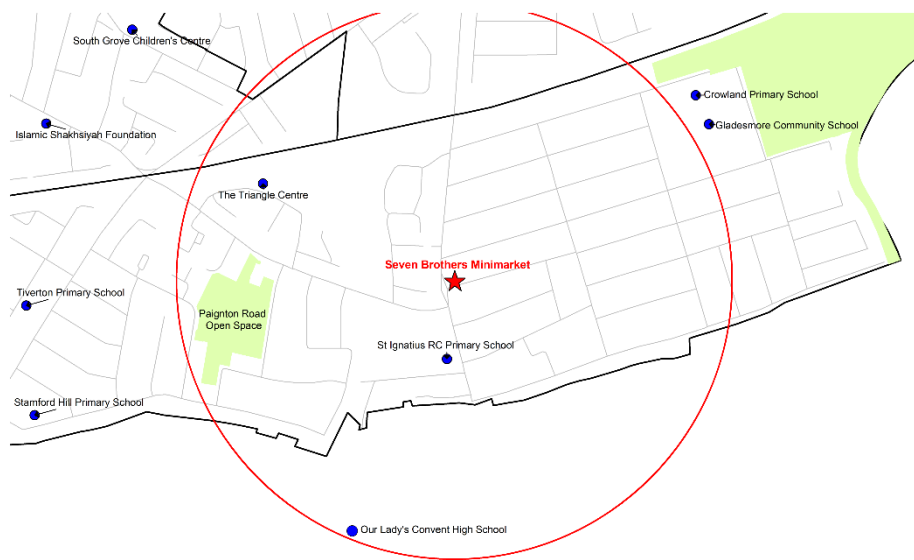


Figure 1: Map showing schools and children's centres and play areas within 500m radius of Seven Brothers Minimarket

Public Safety

There is already availability of alcohol within LSOA of the premises; 4 on-licenses and 3 on-licenses of which none are open after midnight or late hours. The density of licensed premises and hours and days of sale are known to influence consumption and harm. There are 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 50.0%. This is significantly higher than the borough average.

Crime and Disorder

On or near High Road there were 46 crimes in the past year (April 2018 to March 2019), of which 10 (22%) were anti-social behaviour, 5 (11%) were public order and 5 (11%) were violent or sexual offences (Police.UK). Anti-social behaviour and violence or sexual offences are associated with alcohol intake and

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

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).

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

Seven Sisters ward has amongst the largest proportion of 0.19 year olds of all Haringey wards (32.7%), and among the smallest proportions of those age 45-64 (18.4%) and aged 65+ (7.5%) (Haringey Ward Profile: Seven sisters, 2017). There are three education establishments within 500m of the premises including a primary school (1 min walk), secondary school and a children's centre (see Figure 1) (SafeStats London, 2016). In 2017/18, on the High Road, Alcohol related ambulance callouts totalled 121, of which 5 involved a young person under 18 years of age within the 500m of the premises.

Recommendation

Although the applicant has considered the licensing objectives of crime and disorder, public safety and protecting children from harm. The licensing hours to serve alcohol 24 hours goes against what is stated in the policy especially in an area where there is high alcohol related ambulance callouts and anti-social behaviour. There is no 24 hours premises in the area and if the extension of the licensing hours were to be granted, Public Health would like to know additional steps the applicant would take to protect children from harm and demonstrate how they will not add to this level of impact of alcohol on the licensing objective.

If the conditions listed fails to minimise any potential harm to our local residents and there are a number of complaints from residents and schools, we would recommend a revision of the license.

Public Health recommend that the following conditions are to be attached (in addition to those listed in the existing operating schedule).

Prevention of crime and disorder & public safety

- The licensee should continue the responsible retailers plus scheme:
 - 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 irresponsible sales / 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
- All staff shall be trained in recognising signs of drunkenness, how to refuse service and the premises duty of care. Training shall be regularly refreshed and at no greater than 6 monthly intervals
- The premises shall display prominent signage indicating that it is an offence to sell alcohol to anyone who is drunk.
- There shall be no self-service of spirits on the premises.

Protecting children from harm

- The licensee shall require staff to note any refusals to sell to young people in a refusals log. The refusals log shall be checked and signed monthly by the designated premises supervisor. The refusals log shall be made available for inspection upon request by the licensing team, police or trading standards.
- Age-restricted products training shall cover the following steps: the assessment of age; how and when to challenge for proof of age; acceptable proof of age and how to check it; and recording refusals.
- The licensee shall ensure that staff are trained on relevant matters including the conditions on the premises licence; age restricted products; and (if they are ever left in charge of the shop) the operation of the CCTV system and how to deal with visits from authorised officers. The licensee shall keep records of training and instructions given to staff, detailing the areas covered, and make them available for inspection upon request by authorised officers. Staff shall sign to confirm that they have received and understood the training.

These conditions are designed to ensure that the licensee takes appropriate steps to promote and uphold all four licensing objectives. We believe that all licensees who are fulfilling their duty to promote the licensing objectives will be already complying with many of these conditions. These are the type of precautions needed to meet Haringey's Statement of Licensing Policy requirement of a high standard of management.