

Responsible Authority:	Haringey Public Health, London Borough of Haringey
Date:	13/11/2019
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Public Health representation relation to: ARDA STORE, 40 TILSON ROAD, TOTTENHAM, LONDON, N17 9UY

Supply of Alcohol

Monday to Sunday 0700 to 2300 hours

For consumption OFF the premises

Opening Hours

Monday to Sunday 0700 to 2300 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: ARDA STORE, 40 TILSON ROAD, TOTTENHAM, LONDON, N17 9UY

The representation is made under the following licensing objectives:

- **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 wellbeing. 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 directly standardised 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 premises is located within a busy residential area. There is a children's centre and one primary school located within 500 meters of the premises (SafeStats, 2016). There are already 2 off licences located within 250 meters of the premises.

Crime and disorder:

In Tottenham Hale there were 253 crimes per 1,000 residents between February 2017 and January 2019. This was higher than both the Haringey and London levels (224 per 1,000 residents and 187 per 1,000 residents respectively), and is the fourth highest rate of all Haringey wards. The rate of crime in Haringey is more than 19% above the London rate (Tottenham Hale Ward Profile, 2019).

The LSOA (small geographical area) in which the premise is located saw 6 alcohol related ambulance callouts in 2017/18. On Tilson Road there were 31 crimes in the past year (June 18 to May 2019), of which 12 (39%) were violent or sexual offences and 3 (10%) were anti-social behaviour (Police.UK).

This premises is located in the east of the borough where the impact of the sale of high strength beers lagers and ciders is having an adverse effect. The increase in street drinking and anti-social behaviour as a result of the increase and easy availability of these high strength cheap alcohol is being seen within the wards in the east of the borough. Supplying alcohol at cheap prices does not help to prevent anti-social behaviour and undermines the public health message.

Protecting Children from Harm

Due to the premises situated within a busy residential area and two schools located nearby including a children's centre and primary school (4 min walk away). Hartington park is located 0.2 miles from the premises with a playground and multi-use games area to the south of the park, which is popular among school children.

Recommendation:

After reviewing the application, we believe that due consideration had not been given to the licensing objectives of crime and disorder and public safety and that there is sufficient reason for an inclusion of additional conditions.

If this licence is to be granted, Public Health recommends that the following conditions are to be attached, along with the conditions submitted by the applicant, in order to minimise any potential harm to our residents:

Furthermore, please note that the stipulated conditions might (as well) be replicated in the applicants' form, still Public Health wants to ensure that the correct wording is in place.

Prevention of crime and disorder

- Alcohol to be covered when it is not on sale – the retailer should have lockable roller shutter fridges or stand alone fridges that are lockable. “Outside of the hours authorised for the sale of alcohol, all alcohol within the trading area is to be secured behind locked grills/screens or secured behind locked cabinet doors to the satisfaction of the Police or Licensing Authority”
- Spirits are best kept behind the staff at the counter and therefore must be handed over to the customer and allows for there to be more interaction with the seller and the customer.
- 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.
- The licensee should join the responsible retailers scheme.
- High strength alcohol sale restriction: no spirits shall be sold with an ABV (alcohol by volume) greater than 65%, no super-strength beer, lagers or ciders of 6.5% ABV 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
- Any CCTV footage shall be made available to Police or an officer from the local authority as soon as practicable, but in any event within three (3) days upon request, providing the request is within data protection regulations.
- A CCTV system shall be installed and be recording at all times licensable activities are taking place.
- The CCTV shall cover at least the entry/exit of the licensable area. The system shall record for a minimum of thirty (30) days on a system with adequate storage for this purpose.
- All staff involved in the sale or supply of alcohol shall be trained in the law about the sale of alcohol. This includes conditions on the premise licence, operation of the CCTV system, recognising signs of drunkenness upon delivery, how to refuse service and the premises duty of care. Training shall be regularly refreshed and at no greater than 6 monthly intervals and shall be logged. Training records shall be made available for inspection upon request by a police officer or an authorised officer of the Council.

Protection of children from harm

- 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 adopt the ‘Challenge 25 policy’ and promote it on their premises through the prominent display of posters.
- A refusals log must be kept and made immediately available on request to the police or an authorised council officer. The refusal log shall record any actions that appear to be needed to protect young people from harm. The log must record all refused sales of alcohol and include the following:
 - a) the identity of the person who refused the sale;
 - b) the date and time of the refusal;
 - c) the alcohol requested and reason for refusal.