

## APPENDIX 2

### Statement of licensing Policy consultation responses

Subject/Page	Recommendations	Response /Impact on policy	Impact on policy
<b>Public Health Recommendations</b>			
SOLP Layout	<p>For easier read and clarity on licensing functions in the council</p> <ul style="list-style-type: none"> <li>Table suggesting closing times of licensed premises – restaurants and cafes, public houses, hotel bars, nightclubs, off-licenses, takeaways, cinemas and theatres, events in Town centres, local centres and residential areas. Example: Southwark Licensing Policy (page 38)</li> <li>Table of delegations of licensing functions to licensing committee, sub-committees and officers. Example: Southwark statement of Licensing Policy (page 25), City of Westminster statement of licensing policy (page 87)</li> </ul>	<p>Both Southwark and Westminster have Cumulative Impact areas or stress area within their Licensing policy due to their high volume of licensed premises in given areas. Suggested closing times is there as part of their CIP.</p> <p>Haringey do not have the same infrastructure in this regard. Haringey had also set out ‘suggested’ operating times in an earlier SOLP but has since removed the table some years ago. The policy wording relation to hours can be found at 7.8</p> <p>Suggested closing times may also be seen as a predetermination to an application.</p> <p>The table of delegations remains in the SOLP and has been updated.</p>	No change in policy
Partnership working with Responsible Authorities	Clear section on partnership working with responsible authorities included in the Statement of Licensing Policy. There needs to be a visible mention of our partnership	Alcohol consumption is not a licensable activity. The Haringey Licensing Partnership Meeting was previously active but did not meet the needs of the other	No Change in policy.

	<p>approach in our council for the community to be aware that we are actively looking at license premises. Following on from Schools Superzones focus groups, parents and teachers have raised their concerns on the alcohol consumption levels in the borough and would like to see the council is working to strengthen our licensing and improving community safety.</p> <p>As a recommendation, we should hold Haringey Licensing Partnership meetings, there are examples of this happening in other boroughs of London such as Greenwich and Southwark. This is a great way to promote our partnership working with licensing, health, trading standards, planning, and policing. Partners can work better together to respond to vulnerability, complex social need and rebalance our approach towards more prevention and early intervention to reduce the need for crisis response.</p> <p>The Haringey Licensing Partnership Meetings should be held regularly as agreed with all members and outline clear roles of each responsible authority.</p> <p>These meetings will:</p> <ul style="list-style-type: none"> <li>• Agree a list of priority premises</li> </ul>	<p>RAs. The Police. EHO Noise, Trading Standards and Licensing Authority RA are all well versed on matters to consider in relation to licensing applications.</p> <p>The Responsible Authorities must consider an application from their own perspective and make relevant representation if they consider it necessary and be able to support and defend the representations they make.</p> <p>The meetings can be supported again going forward but do not need to be included in the policy as they would be seen as an operational tool.</p> <p>The LA will not pre- determine applications</p>	<p>Will resume quarterly meetings with RAs</p>
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	<ul style="list-style-type: none"> <li>• Decides partnership response to promote the licensing objectives in relation to the priority premises</li> <li>• Considers and agrees actions on applications currently being consulted on</li> <li>• Considers and agrees actions on all applications to be decided at forthcoming licensing committee hearings</li> <li>• Considers licensing training needs for safer neighbourhood team officers and communications with safer neighbourhood panels</li> <li>• Considers and agrees on appropriate communications in relation to current activity.</li> </ul>		
Alcohol delivery-online businesses	<p>We have seen alcohol businesses becoming online and this is likely to increase. There needs to be conditions for consideration by any potential applicant which may include (but are not exhaustive):</p> <ul style="list-style-type: none"> <li>• age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.</li> <li>• CCTV system in place</li> <li>• The premises shall operate as a delivery-only business. The premises shall not be</li> </ul>	This does not belong in the policy, this list of model conditions can be kept by the RAs and can be considered adding where appropriate on any relevant premises licence application form.	No Changes required to policy

	<p>open to the general public and shall be used for the dispatch of alcohol only. There is to be no collection by the public of their orders from either the premises or the building(s) containing the premises.</p> <ul style="list-style-type: none"><li>• Alcohol must only be sold for consumption off the premises and shall only be supplied in sealed containers.</li><li>• All sales of alcohol to individuals (rather than businesses) must be paid for at the time of ordering: debit or credit card, electronic payment such as PayPal, etc.</li><li>• A record of orders shall be kept which shall include the customer's name &amp; address. In accordance with data protection regulations, a record of sales and deliveries will be kept and made available for inspection by the Police, Licensing Authority or officers from the Trading Standards team for 6 months from the date of delivery or refusal of alcohol.</li><li>• The delivery of alcohol shall be made only to a residential or business address, which the customer uses in a residential or official capacity. The delivery of alcohol shall not be made or completed to a person in a public place (street corner, park, bus stop, etc.)</li><li>• Online sales of alcohol shall be made via the CallValidate age verification system provided by CallCredit, or any similar</li></ul>	<p>We would not support conditioning a direct company for the applicant to have to sign up to (CallValidate)</p>	
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	<p>system that can verify a customer's age to the same degree as the CallValidate system. Similar systems shall include, but not be restricted to, Experian ProveID, Capita Identity Solutions, GB Group ID3Global LV, and LexisNexis TraceSmart.</p> <ul style="list-style-type: none"><li>• All customers shall be contacted in writing (e.g. e-mail or text) to notify them that an order has been placed, with the date, and if possible approximate time, of the expected delivery.</li><li>• Couriers delivering orders shall require a signature from the recipient upon delivery in a form that can be captured and fed back to the licence holder in a way that follows social distancing government guidelines. The only exception to this requirement is when prior delivery arrangements to a safe place have been made in writing by the customer.</li><li>• No spirits shall be sold with an ABV greater than sixty-five per-cent (65%).</li><li>• Alcoholic beverages shall not be delivered less than twenty-four (24) hours after the order has been placed.</li><li>• Delivery riders must be instructed to abort delivery where that sale is believed to be a "street sale" or to an open space. All such instances will be recorded in the refusals/incidents log.</li></ul>		
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	<p>For restaurants/takeaways:</p> <ul style="list-style-type: none"> <li>• The alcohol delivery service will be ancillary to the provision of takeaway food. All alcohol deliveries must be accompanied by an order for food, the food contingent of the delivery being a minimum of [£X].</li> <li>• All forms of advertising and promotional literature dealing with the delivery service (including internet sites and flyers/leaflets) will clearly and prominently state that alcohol will only be delivered together with an order for food, the food contingent of the total delivery being a minimum of [£X]. It will also advise of the premises 'Challenge 25' policy, which forms of approved ID will be accepted and that failure to show the required form of ID will result in non-delivery of the alcohol. This will be reiterated at the point of sale e.g. through an online ordering website/platform</li> </ul>		
Responsible Retailers scheme	Promote RRS especially where premises are in 200m of schools/colleges.	This is an activity that officers from PH and Trading Standards are able to undertake. The Responsible Retailer scheme is mentioned in the policy but is not mandatory.	No changes required to policy
Early Morning Restriction Orders	We should strongly consider incorporating this in our policy	No reason provided to explain why this should be incorporated.	No changes required to policy

		An EMRO restricts the time after which alcohol may be sold or supplied, with the time being set by the Licensing Authority being between midnight and 6am.	
Public Nuisance (page 32)	Licence holders and applicants are encouraged to consider whether early morning alcohol deliveries and collections at their premises could potentially result in public nuisance and to introduce measures to minimise the impact where appropriate.	This is already a matter considered by the EHO Noise and Licensing Authority RA	No changes required to policy
Closing hours of premises in relation to existing off-licenses or premises	In an area where there are already several existing off-licences or where the premises is situated within a parade with another off licence and where representations are received about negative impact on the licensing objectives of a further premises, the application may be refused on these grounds or restrictions placed on the terminal hour to reflect opening hours of other shops	No cumulative impact policy in place to support this stance.	No change in policy
Community Involvement	Consider how community can be involved in the representations and petitions	Already included in the process	No change to policy
The prevention of Crime and disorder (page 22) – Tottenham Hotspurs stadium	It should be noted that the area around the Tottenham Hotspurs stadium during match days may suffer the most crime and disorder issues. This is an area with several number of schools surrounding and furthermore this is located in an area of deprivation. It is crucial that the police and Tottenham Hotspur work in partnership to reduce the scale of alcohol consumption prior to kick off. There is a strong indication in other boroughs that the police have experienced a high percentage of	The Stadium already holds a Premises Licence and PH like all the other RAs could have made relevant representation during the application stage.  All the pubs in the Stadium footprint have specific conditions about the times of alcohol sales on a match day and the use of SIA. The no street drinking zone is also invoked on match days to a higher level to ensure patrons are not out on the street drinking at the pubs.	No change to policy

	<p>those arrested or ejected have consumed alcohol in or near to the ground. Given the high profile nature of matches at Tottenham Hotspurs and the possible spike in crime and disorder and alcohol consumption, the licensing policy should reflect the unique circumstances. The applicants are expected to identify issues that may rise to crime and disorder problems on match days and where appropriate and relevant to include measures to deal with such issues in their operating schedule.</p> <p>In the Schools Superzones focus groups, we had a number of parents raising concerns on alcohol consumption, particularly on match days. In the evaluation report, it is stated that the problem of ASB appears to be exacerbated following football matches at Tottenham Hotspur stadium. The majority of parents that mention match days noted that there were multiple stewards patrolling the high street following matches, however, there seems to be a particular issue with ASB and lack of stewards on the side streets.</p> <p style="padding-left: 40px;">[“There is a lot of visibility of people in hi-vis on the high road on match days, but slightly off the high road, you don’t get that much visibility”- Parent, Holy Trinity primary</p> <p>Notably, there was also an excess of litter on the streets including cans and bottles. There appeared to be a lack of civic pride, with many</p>	<p>Conditions are applied by the Police and Licensing Authority on premises in the immediate football footprint.</p>	
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people fly tipping and throwing litter on the streets without care. Many Parents also mentioned they would frequently hear people swearing on the streets and they did not want to expose their children to this.

[ “it was a surprise to me... seeing this carton outside your house filled with empty bottles, somebody passing might be thinking that I’ve been drinking... because it’s just outside my house, it’s embarrassing as well, after these matches they need to control this... on the High St and our street also, there are lots of cans and bottles” -Parent, Welbourne primary

More stewarding on side streets need to be included.

Applicant should consider the following conditions:

Restricting alcohol sales in relation to designated special events, eg. football matches

Prior to any ‘designated sporting event’ (as defined in the Sporting Events Control of Alcohol Act 1985)] the premises licence holder shall ensure that:

	<ul style="list-style-type: none"><li>• Alcohol sales in respect of cans of beer or cider are limited to no more than four cans per person for a minimum of four hours before the commencement of the relevant designated [special] [sporting] event</li><li>• No sales of alcohol in bottles or glass containers are made in the period four hours before the commencement of the designated [special] [sporting] event</li><li>• Alcohol sales cease for a period of one hour immediately before the commencement of the relevant designated [special] [sporting] event</li><li>• On any day where there is a relevant designated [special] [sporting] event taking place, the premises will not externally advertise as a result of a local store promotion the availability of beer or cider in such a way as to be likely to be the sole inducement to attract persons to the premises who are either attending the designated [special] [sporting] event or in the vicinity of the premises as a result of the designated [special] [sporting] event</li><li>• All members of staff working at the premises are informed of this condition prior to taking up employment</li><li>• On the day of the relevant designated [special] [sporting] event, upon the direction of a police officer/stewards, using the grounds of the prevention of</li></ul>		
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	<p>crime and disorder or public safety, the premises will immediately cease to sell alcohol until further directed.</p> <ul style="list-style-type: none"> <li>• Drinks shall only be supplied in polypropylene or similar plastic made of recyclable materials and all bottled drinks shall be poured into such drinking vessels before being handed to the customer.</li> <li>• Registered door staff shall be employed to control the entry and exits to the premises and to manage any licensed outside area(s).</li> </ul>		
<p>Restaurants and takeaways (alcohol)</p>	<p>The premises must only operate as a restaurant:</p> <ul style="list-style-type: none"> <li>• in which customers are seated at a table</li> <li>• which provides food in the form of substantial table meals that are prepared on the premises and are served and consumed at the table using non-disposable crockery</li> <li>• which do not provide any takeaway service of food or drink for immediate consumption, and</li> <li>• where alcohol must not be sold, supplied, or consumed on the premises, otherwise than to persons who are taking substantial table meals and provided always that the consumption of alcohol by such persons is ancillary to taking such meals.</li> </ul>	<p>These are model conditions and it is for the RAs to consider if and when they are used or appropriate to be submitted for a given application.</p>	<p>No change to policy</p>

	<ul style="list-style-type: none"> <li>Sales of alcohol for consumption off the premises shall only be supplied with, and ancillary to, a takeaway meal.</li> </ul>		
The Protection of Children from Harm (pg 48)	The applicant may consider restricting licensing hours in the early morning during school run for premises in close proximity to schools to protect children from harm	<p>We would ask for evidence of children being harmed before imposing this.</p> <p>The Section 182 Guidance advises of the following: The protection of children from harm includes the protection of children from moral, psychological and physical harm. This includes not only protecting children from the harms associated directly with alcohol consumption but also wider harms such as exposure to strong language and sexual expletives (for example, in the context of exposure to certain films or adult entertainment). Licensing authorities must also consider the need to protect children from sexual exploitation when undertaking licensing functions.</p>	No change to policy
<b>Ladder Community Safety Partnership</b>			
	<p><u>Map of the Wards in the borough</u></p> <p>It might be worth pointing out that for the bulk of the period covered by this document a new configuration of Wards/names will be applicable,</p>	Policy can be updated to reflect these changes a later date	No change to policy

	having been determined by the Boundary Commission. This could comprise a simple statement to that effect, or a map of the new divisions/names or both.		
<b>Overview &amp; Scrutiny</b>	Request for a piece of work to be undertaken to look at bring in a cumulative impact policy relating off licences in the borough	The current policy is not seeking to do this but can look to gather information and report back to Regulatory and O&S in Summer 2021.	No change to policy