

Responsible Authority:	Haringey Public Health, London Borough of Haringey
Date:	08/04/2020
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Public Health representation relation to:

**APPLICATION FOR A NEW PREMISES LICENCE (TIME LIMITED) – THE OPEN ARMS,
FINSBURY PARK, LONDON N4 2NQ
ON 19TH MAY TO 19TH SEPTEMBER 2021**

Supply of Alcohol

Wednesday to Sunday 1200 to 2100 hours

Bank Holiday Mondays 1200 to 2100 hours

For consumption **ON** and **OFF** the premises

Hours open to the public

Wednesday to Sunday 1200 to 2130 hours

Bank Holiday Mondays 1200 to 2130 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 variation of premises license at: **The Open Arms, Finsbury Park, London, N4 2NQ**

Public Health has specific concerns around the provision of alcohol being served in the park and its impact on the following licensing objectives:

- Crime and Disorder
- Public Safety
- 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. 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 in Finsbury Park, which is located on the southern boundary of the London Borough of Haringey, adjacent to the London Boroughs of Islington and Hackney and sits in Harringay ward. The red cross shows where the proposed premises will be located, closer to the children and young people’s play area (Richard Hope Play Space and Main Play Areas).



Source: Haringey Finsbury Park: Park Management Plan 2020

Crime and disorder

The proportion of all ambulance callouts that are alcohol related in the LSOA was higher than the borough average. There have been 51 Alcohol-specific hospital admissions within the LSOA of the premises (SafeStats, Ambulance Callout Data, Nov 2019- October 2020). We already know from the data street-drinking within and around Finsbury Park is a major concern.

In Finsbury Park, there were 855 crime reported in the last 2 years (2019-2021), of which 485 (57%) were anti-social behaviour. This type of crime is associated with alcohol intake and pose a risk to the safety of the general public including children and young people who also use the park. As 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 is having an adverse effect across Haringey. An increase in street drinking and ASB is related to the increase and easy availability of high strength cheap alcohol. Super strength ciders, larger and beer which are 6.5% Alcohol by Volume (ABV) and above are one of the most harmful forms of alcohol and this is a real concern from a public safety perspective.

Increases in heavy drinking have marked negative consequences on both physical and mental health. A number of studies have shown that longer on-premise alcohol availability leads to overall increases in alcohol consumption in the form of heavy drinking and that this, in turn, has detrimental effects on individual mental and physical health through increased heavy drinking. There is also a clear association between alcohol outlet density and violence and that suggest that the issues of alcohol availability and access are important to the prevention of alcohol-related problems within communities.

Public Safety

As the COVID restrictions are easing more people will be accessing parks especially during the summer period, we will be seeing an increase in the number of visitors in the park and the event itself will generate even more people into the area. A robust COVID risk assessment is necessary for this application.

Protecting Children from Harm

The prevalence of street-drinking within Finsbury Park is a significant concern as it can contribute to crime and anti-social behaviour in the area, resulting in littering from drinking. Children and families use the Main play areas and Richard Hope Play Space frequently, these areas are located near the proposed premises. As the lockdown eases and we approach the summer period we will see an increase in families accessing the parks. The event will not be ticketed and fenced; therefore, the bar will be open to the public. Customers will be able to carry alcohol outside the seated area and drink elsewhere in the park, we are concerned this may raise safeguarding issues as well as increasing the likelihood of anti-social behaviour and other incidents. The applicant has not considered the layout of this event thoroughly in these current times. This undermines our Place Priority: *"A place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green."*

Note: The applicant will ensure a fence will be set around the fully perimeter of the licensed area, as stated in their additional conditions.

Recommendations

After reviewing the application, we believe there is further protection/security needed to protect the public from alcohol-related harm and COVID and ensure the licensee is promoting the licensing objectives, crime and disorder, public safety and the protection of children from harm.

The Public Health team have reviewed the COVID risk assessment submitted by the applicant on 21st May 2021, and we would like to include further recommendations below:

1. Regular lateral flow testing is being requested for all staff. Staff should be made aware this can be done at home or at a rapid lateral flow test sites. More information on the location and access to Lateral Flow Device test kits please visit this link <https://www.haringey.gov.uk/news-and-events/coronavirus-covid-19-haringey-together/health-advice/covid-19-testing-haringey>
2. Wearing masks: Staff should always wear masks within their working areas.
3. Toilets cleaned regularly and being spaces apart to support with safe queuing and use.

Due to Open Arms being based in a park, also partnering with organisations that have children, young people and vulnerable adults we recommend the following:

- Develop an organisation safeguarding policy
- Managers and staff to have safeguarding training,
- Develop a reporting mechanism within their organisation
- Have knowledge of local safeguarding reporting procedures
- <https://www.haringey.gov.uk/children-and-families/childrens-social-care/child-protection>
- <https://www.haringey.gov.uk/social-care-and-health/safeguarding-adults>

We are happy to see the applicant has accepted our conditions below to minimise any potential harm to our residents:

Crime and Disorder and Public safety

- 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.
- 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.

- Ensuring there are sufficient bins within the event space so litter can be discarded appropriately as the consumption of alcohol and discarding of cups/cans outside of the area causes a nuisance to residents, people and families who live near or visit the park.

Protecting children from harm

- The licensee shall adopt the 'Challenge 25 policy' and promote it on their premises through the prominent display of posters.
- Only a passport, photo-card driving licence, Armed Forces ID cards or a proof of age card bearing the official "PASS" accreditation hologram should be accepted as proof of age.
- 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 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.
- More robust security to prevent alcohol from being consumed near and in areas children and young people play and use.