

## **Appendix B**

### **Responsible Authority /Public Health Representations**

Fancy Delivery Uk Limited  
Elco House  
22-24 Homecroft Road  
Wood Green  
London N22 5EL

Your Ref:  
Our Ref: Licensing  
Date: 20<sup>th</sup> August 2021

### REPRESENTATION LETTER

Dear Sir/Madam,

#### LICENSING ACT 2003 – Licence Application - Fancy Delivery UK Limited, Elco House, 22-24 Homecroft Road, Wood Green, London N22 5EL

I have considered the application and feel that the conditions offered do not fully address the licensing objectives of Public Safety and reducing Crime & Disorder adequately. I believe that the following wording should be imposed

- Staff making the deliveries of alcohol must be at least 18 years of age.
- Alcohol can only be delivered to a residential or business address not a public place.
- Delivery staff will not deliver to any person anywhere other than a residential/business address given when the order was placed.
- Any deliveries containing alcohol where the recipient is unable to provide identification and proof of age will be terminated.
- Residents are not caused nuisance or disturbed by any delivery service providers, drivers do not congregate on residential roads.
- Toilet facilities are provided for drivers at the premises,
- All delivery services are provided in a courteous, safe and respectful manner, and
- All deliveries are provided in accordance with the law on road use, parking and licensing., that is no vehicles to be parked on the footway.
- A record of orders shall be kept which shall include the customer's name & address. In accordance with data protection regulations, this log shall be made available to Police and local authority officers on request.
- 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.).

- All customers shall be contacted in writing (e.g. e-mail or text or App Notification) to notify them that an order has been placed, with the date, and if possible approximate time, of the expected delivery.
- Couriers delivering orders shall keep records requiring signature upon delivery in a form that can be captured and fed back to the licence holder.
- If the recipient of a delivery of alcohol appears under 25 years of age, recognised photographic identification will be requested before any intoxicating liquor is handed over. Acceptable proof of age shall include identification bearing the customers photograph, date of birth and integral holographic mark or security measure. Suitable means of identification would include PASS approved proof of age card, photo-card driving licence and passport.

If you have any further questions, please do not hesitate to contact me

Yours sincerely

Phil Cone

**Licensing Enforcement Officer**

<b>Responsible Authority:</b>	Haringey Public Health Team, London Borough of Haringey
<b>Date:</b>	09/09/2021
<b>Name:</b>	Maria Ahmad, Public Health Officer, Health Improvement Marlene D'Aguilar, Health in All Policies Officer

We as a representatives 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: **Fancy Delivery UK Limited, Elco House, 22-24 Homecroft Road, London N22 5EL**

Public Health has concerns under the following Licensing Objectives:

- **Public Safety**
- **Public Nuisance**
- **Protection of Children from Harm**

#### **Local context**

The premises is located within the Woodside ward in a highly residential area. The premises is located on Homecroft Road. With 16,075 residents, Woodside's population is larger than either the average Haringey (14,243) or London (13,919) ward.

There are already 11 on-licences and 3 on off-licenses in the LSOA (Lower Super Output Area).

The premises is also located near 5 schools and colleges;

Lordship Lane Primary School (0.169 miles)  
 Noel Park Primary School (0.570 miles)  
 Woodside High School (0.271 miles)  
 St Thomas More Catholic School (0.555 miles)  
 St Thomas More Catholic School Sixth Form (0.555 miles)

There are 3,276 children (ages 0-17 years) living in this ward, which is ranked 7<sup>th</sup> highest ward.

#### **Public Safety, Public Nuisance and Protection of Children from Harm**

Haringey sells the most litres of alcohol per adult in all of London, 35% more than the London average. There is no 24-alcohol delivery service within the area and allowing this 24-hour application to go forward will set a precedent to more 24-hour alcohol delivery services. This will adversely impact public health and safety concerns in the area. 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 increased 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.

A Public Health England report shows a **34% increase in the number of people drinking over 50 units a week during lockdown**. The feeling of stress, anxiety and isolation have pushed some people in becoming dependent on alcohol to cope or self-medicate, and those in recovery returning back into their old destructive habits of substance misuse. Drinkers consuming alcohol confined in home settings may also

cause an escalation of harm to those in the household environment including domestic violence and child maltreatment. Woodside is ranked third in the number of domestic and sexual violence incidents. We are concerned the increased accessibility with lack of regulatory control will cause higher levels of alcohol consumption among some groups and therefore, it is paramount more than ever to address safeguarding issues and protect our vulnerable communities e.g., children aged under 18 and problem drinkers. Online alcohol delivery services have become a convenient way for problem drinkers and children aged under 18 to easily access alcohol and we must ensure effective measures are put in place to protect our community against alcohol-related harms. Further to this, we must have measures in place to reduce the delivery of alcohol to people already intoxicated. The Public Health team has concerns that granting a 24-hour license could exacerbate this.

A report from the Centre for Alcohol Policy Research (CAPR) at La Trobe University highlighted the risks posed by the sudden growth in online alcohol sales and delivery, finding that high levels of risky drinking is associated with rapid delivery service.

It should also be noted that Haringey has a high proportion of adults in the alcohol treatment services. There are currently 356 adults in our alcohol treatment services with an additional 230 adults starting their treatment in 2019-20 (Public Health England, 2021).

There has been **73 Alcohol-Specific Hospital Admissions in the Woodside ward** of which **8** were in the LSOA of the premises (April 20 – March 21). The proportion of alcohol related ambulance callouts in the LSOA (of the premises) **between 11pm and 5am was 38.5%** for the year 2019-20 (SafeStats, Ambulance Callout Data, April 2020 - March 2021). The high levels of ambulance related callouts reflect the increased pressure and cost to the NHS because of the increase in alcohol availability in this ward and disproportionately places burden on the ambulance service for this ward compared to others in the borough.

Woodside ward has the third highest number of domestic abuse with 225 offences and 336 incidents reported in the last year (September 2021, The Mayor's Office for Policing and Crime). There is evidence that suggest alcohol played a role in 55% of domestic violence cases among these victims. Another study published by the Institute of Alcohol Studies (IAS) showed that victims of domestic abuse were twice as likely to consume alcohol than their partner who perpetuated the abuse.<sup>1</sup>

The impact of the sale of high strength beers, lagers and ciders is having an adverse effect within the wards to the East of borough. The wards have seen an increase in street drinking and ASB as a result of the increase and easy availability of high strength cheap alcohol.

Premises that operate alcohol deliveries late at night and early morning could potentially result in public nuisance and impact families in the local residential area. Delivery mopeds generate noise, which can increase noise levels in a residential area and parking mopeds near homes could disrupt people walking by. Therefore, we must introduce measures to minimise the impact where appropriate.

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<sup>1</sup> [Domestic Abuse and Women's Alcohol Issues](#)

## **Recommendations:**

Public Health reject a 24-hour alcohol license. We do not find it reasonable for alcohol to be sold after midnight hours in a highly residential area. It is not a matter of convenience and availability as there are sufficient premises to meet demand for alcohol with many off licences and on license premises located close by. We are not confident online supermarkets are able to regulate discounts/promotions on alcohol on their overall shopping basket which may include alcohol, unlike visiting stores who do not provide this incentive. Public Health recommend the hours of alcohol supply to be reduced to Monday-Sunday 9am to midnight. We believe the following provide grounds to shorten the hours:

1. Deliveries will be made in residential areas near several schools (5 schools and colleges within 0.5 miles) and this will have an impact on night-time noise especially within this residential area.
2. There has been **73 Alcohol-Specific Hospital Admissions** within the ward and 5 near to the premises.
3. We do not have any 24-hour online alcohol service delivery in the area. If we allow a 24-hour application to go forward, this will give precedent to further 24-hour alcohol businesses opening in the areas, which will adversely impact public health and safety concerns..
4. Increased noise levels in residential area from delivery mopeds will cause noise disturbances in the neighbourhood.

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.

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.

*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.*

- There must be a designated resting area within the premises with toilet facilities for delivery drivers.
- 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 where alcohol is sold at a price lower than that at which the same or similar alcoholic drinks are sold, or usually sold.
- The premise shall not be open to the general public and no collection shall be made by the public outside of the alcohol hours requested. Alcohol shall only be supplied in sealed containers.
- Alcohol shall be stored securely, when on premises, at all times.
- A record of orders shall be kept electronically which shall include the customer's name & address. In accordance with data protection regulations, this log shall be made available to Police and local authority officers on request.
- 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.).
- 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.
- The courier shall request form of identification on age restricted products.

- High strength alcohol restriction: no spirits shall be sold with an ABV greater than sixty-five percent (65%), no super-strength beer, lagers or ciders of 6.5% ABV (alcohol by volume) or above shall be sold at 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.
- The premises shall display prominent signage (i.e. online) indicating that it is an offence to sell alcohol to anyone who is drunk.

#### Protection of children from harm

- The applicant must ensure age verification takes place before the customer is sold alcohol and adopts the present age verification methods/systems utilised by online traders.
- The licence holder has to ensure all delivery drivers are given Challenge 25 training, the till prompts and receipts have a check ID tick box once the ID has been seen. The DPS or store manager must check frequently to ensure drivers are requesting ID on all orders purchasing alcohol.
- A refusals log must be kept and made immediately available on request to the police or an authorised person. 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.