

<b>Responsible Authority:</b>	Haringey Public Health, London Borough of Haringey
<b>Date:</b>	06/04/2022
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**APPLICATION FOR A PREMISES LICENCE – THE CAUSE, 15-19 GARMAN ROAD, TOTTENHAM, LONDON, N17 0UR**

**Supply of Alcohol**

Friday	1800 to 0545 hours
Saturday	0900 to 0545 hours
Sunday	0800 to 2245 hours

Supply of alcohol **ON** the premises.

**Bank holidays** from 18:00 hours on the day preceding to 23:00 hours the following day

**Hours open to Public**

Friday	1800 to 0615 hours
Saturday	0800 to 0615 hours
Sunday	0800 to 2315 hours

**Bank holidays** from 18:00 hours on the day preceding to 23:00 hours the following day.

We 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: THE CAUSE, 15-19 GARMAN ROAD, TOTTENHAM, LONDON, N17 0UR

The representation is made under the following licensing objectives:

- Prevention of Crime and Disorder
- Public Safety
- Public Nuisance
- Protecting Children from Harm

### **Local Context of the Premises**

The premises is located on Garman Road, within the Northumberland Park ward. Northumberland Park is the most deprived ward in the borough and is ranked 1st in London (out of 637 wards). It is approximately 0.2 miles from Northumberland Park station and a 192-bus stop is located on Watermead Way, 0.2 miles away from the premises. The surrounding area consists of industrial sites, several local businesses and residential areas.

There are 12 off-licenses and 4 on-licenses within the LSOA<sup>1</sup>, of which 4 off-licenses and 1 on-licence are open after midnight.

There is a community group in the vicinity of the premises, providing services for our most vulnerable:

- The Northumberland Neighbourhood Resources Centre (NRC) located on 177 Park Lane (0.5 mile, 10 mins walk) – this is a community space used by our most vulnerable as there is a high demand in this location. As part of the council's localities work, CCG are currently trialling use of the NRC as a North Tottenham hub – providing a range of different services from the council, NHS and partners.

The premises is also located near 2 primary schools:

Lea Valley Primary School (0.439 miles)

Harris Primary Academy Coleraine Park (0.472 miles)

### **Prevention of Crime and Disorder, Public Safety, Public Nuisance and Protecting Children from Harm.**

As stated by the applicant 15-19 Garman Road planning application was submitted to planning; *The demolition of the existing industrial buildings and redevelopment to provide a new building for manufacturing, warehouse or distribution with ancillary offices on ground, first and second floor frontage together with 10No. self-contained design studio offices on the third floor.*

The applicant has stated that planning has approved the development, however for the intended use above. The floor plans submitted do not appear to indicate a club type entertainment establishment and does not highlight where the licensed areas will be therefore, we are uncertain about the suitability of the site to be used as a night club which has the potential to cause nuisance, music/noise disturbances to surrounding properties, sleep disturbance, litter, and crowd gatherings.

Further to this, premises that operate late at night and early morning could potentially result in public nuisance and impact families living in the area. The events being held will attract more customers to the area. This type of premises can have a potential impact on a local community in the following ways; disturbance late at night from the departure and dispersal of patrons, disturbance from patrons outside, drunkenness problems associated with long hours and violence associated with alcohol consumption. Although, the operating schedule provides some information to address and promote the licensing objectives, we are not confident the applicant acknowledges the issues, which may arise from the premises being in the area and how an application for a night-club establishment seeks to make a positive contribution to the local community, demonstrating a commitment to both those living in the vicinity and the licensing objectives. Therefore, we ask the applicant to consider a reduction in the hours for the sale of alcohol.

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<sup>1</sup> LSOAs (Lower-layer Super Output Areas) are small areas designed to be of a similar population size, with an average of approximately 1,500 residents or 650 households.

### **Data/Evidence of alcohol-related harms in the area**

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/OHID, 2021).

The impact of alcohol on health is particularly severe. Haringey has the 8th highest rate of admissions in London. The LSOA in which the premises is located at has the highest rate of alcohol-specific hospital admissions than the borough average with **21 Alcohol-Specific Hospital Admissions** in the LSOA (Oct 2020 – Sept 2021). This has increased from the previous year, which saw 8 alcohol related ambulance call outs. The LSOA is **ranked 1<sup>st</sup> in alcohol-related ambulance call outs**. The proportion of all alcohol-related ambulance callouts in the LSOA (of the premises) **between 11pm and 5am is 33.3%** for the year 2020 to 2021 (SafeStats, Ambulance Callout Data). The high levels of ambulance related callouts reflect the increased pressure and cost to the NHS because of increase alcohol availability in this Ward and disproportionately places burden on the ambulance service for this Ward compared to others in the borough.

Northumberland Park Ward has second highest number of domestic abuse with 329 offences and 500 incidents reported last month (May 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.

The impact of the sale of high strength beers, lagers and ciders is having an adverse effect within the wards to the east of the borough, particularly the more deprived wards of Northumberland Park, Noel Park and Tottenham Green. These wards have seen an increase in street drinking and ASB as a result of the increase and easy availability of high strength cheap alcohol.

### **Comments on Staff Handbook**

Below are the additional actions we would like to see included in the staff handbook.

#### **3.18 Noise**

- Quiet areas provided (for patrons as well).
- Staff rotation between quiet and noisy areas.
- Staff trained in noise risks and the protective measures needed.

#### **5 Discipline & Appeals**

- Staff trained to spot potential agitators, defuse tense situations etc.
- Adequate number of trained, SIA badged security staff.

- Information sharing with police and other security staff at licensed premises in the area
- Staff trained in procedures re-entry, queuing, searches, etc and signs displayed for public.
- Ensuring overcrowding is not permitted in any area.
- Security staff aware of all exits.

## Recommendations

Public Health rejects this application as it is unclear from the submitted plans the premises suitability to be used as a night-club. The applicant must seek the correct planning permission for the intended use of a club entertainment establishment.

Public Health would like more information on the maximum numbers accommodated at the premises and a comprehensive risk assessment submitted to identify potential hazards to residents, vulnerable people, customers, and staff (e.g., noise, violence, poor ventilation, overcrowding, drugs) and what will be in place to manage the hazards. This will give greater confidence that the applicant acknowledges the potential issues, which may arise from the premises being located near local businesses and residential properties and there will be stringent mitigation measures in place.

If this licence is to be granted Public Health recommend that the following conditions are to be attached to minimise any potential harm to our local residents and vulnerable adults.

*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, Public Safety and Public Nuisance

1. Designated staff should be trained in Mental Health First Aid.  
<https://www.haringey.gov.uk/children-and-families/childrens-social-care/child-protection>
2. A direct telephone number for the Licence Holder/DPS of the premises shall be publicly available at all times. The number is to be made available to residents and businesses in the vicinity. Any complaints shall be remedied within 48 hours and details to be recorded in the incident book including the action taken by the Licence Holder/DPS  
<https://www.haringey.gov.uk/social-care-and-health/safeguarding-adults>
3. No person shall be allowed to enter or leave the premises whilst in the possession of any drinking vessel or open glass bottle, whether empty or containing any beverage.
4. Legible notices displayed at exits about noise when leaving the premises ('respecting needs of local residents and leaving the area quietly')
5. Litter – clearing public area immediately surrounding premise daily if consumption is taking place outside the premises.
6. Alcohol to be covered and secured outside of the hours of operation within the trading area.
7. 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.
8. High strength alcohol restriction: no spirits shall be sold with an ABV greater than sixty-five per-cent (65%), no super-strength beer, lagers or ciders of 6.5% ABV (alcohol by volume) or above shall be sold at the premises.

9. 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
10. 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.
11. A CCTV system shall be installed and be recording at all times licensable activities are taking place.
12. 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.
13. 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, 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.
14. The premises shall display prominent signage indicating that it is an offence to sell alcohol to anyone who is drunk.

#### Protection of children from harm

1. The licensee shall adopt the 'Challenge 25 policy' and promote it on their premises through the prominent display of posters.
2. 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.
3. 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.

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.