

APP 2

Statement of licensing Policy consultation responses

Subject/Page	Recommendations	Response /Impact on policy	Impact on policy
Public Health Recommendations			
SOLP Layout	Alcohol health data is updated: <u>–</u> ‘the significant negative impact of alcohol on our residents, reflected in hospital admissions and deaths from alcohol related illnesses, alcohol induced crime and domestic violence’ <u>–</u> ‘6,113 patients in Haringey were identified by their GP with Alcohol abuse or dependency. This is significantly higher compared to the North Central London (NCL) average. However, this is based on recording at GP practices, so the true prevalence is expected to be higher’ - Haringey has the twelfth lowest rate among all London boroughs and Haringey has the fourth lowest rate of alcohol-related hospital admissions of all five NCL boroughs. Alcohol is responsible for more than 7,000 deaths annually and it accounts for 167,000 years of life lost due to premature mortality.	All matters from Public Health are noted and updated data accepted into the Policy.	All Public Health data updated in policy. Some data points to Haringey/Green Lanes and High Road N17 being areas of very high alcohol consumption above the UK level. Note this is due to these locations being areas for large events taking place, hence the reason why the figures are skewed.

	The economic burden on the NHS is substantial, with an estimated cost of over £4 billion per year The rate of hospital admissions for alcohol-specific conditions was 2.5 times higher in males than in females. At ward level in Haringey, significant variations are evident relating to hospital admissions for alcohol specific conditions during 2023/24. These variations generally correlate with patterns of deprivation across the borough as shown on the map (Figure 1.) In 2023/24, Hornsey ward had the highest Indirectly Standardised Ratio (ISR) for alcohol-specific hospital admissions at 144, indicating that admissions were 44% higher than the Haringey average. Tottenham Hale and White Hart Lane wards also had higher admission ratios with ISRs of 139 and 133, respectively. - Children's Services carry out assessments for Children in Need (CIN) in the borough. During these assessments, a range of factors affecting the child are recorded. In 2024, parental alcohol misuse was the most frequently identified factor, appearing in 7% of assessments (175 cases). Furthermore, Haringey adults in specialist alcohol treatment 15% (n=60)		
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	were parents living with children, and 9% (n=35) were parents not living with children. - Data on alcohol consumption in children and young people is limited to national and local surveys conducted in schools. Results from the NHS Survey on smoking, drinking and drug use among young people shows that there has been a decline in alcohol consumption amongst young people in England over the last 20 years.		
Inclusive Economy	A reference to Haringey's Inclusive Economy Framework – Opportunity Haringey – would be useful in this section. As would how the policy/Haringey deals with markets and outdoor dining applications so businesses are clear from the outset. The reference to the role of hospitality and cultural/events businesses in the economy could be strengthened, given the forthcoming opportunities presented by the Borough of Culture and Euro '28 Men's Football tournament. Also fully support the statements that 'entertainment and night time economies make a valuable contribution to economic	This is not relevant to the Policy. Pavement licences are mentioned but only in so far as it relates to the licensable activity of alcohol sales in these outside spaces. Markets are not licensed under LA03. Individuals who wish to offer a licensable activity under LA03 such as sale of alcohol/late night refreshment are able to apply for necessary licenses alongside requiring a Street Trading licence. Not a Policy matter	No Change to Policy No Change to Policy

	growth’ and ‘that an effective licensing policy can ensure that neighbourhoods have a vibrant entertainment and night time offer’. We would be keen to hear more about the support to speak to applicants early and in educating them on how to avoid alcohol related problems and preventing the need for enforcement, which is welcomed. The new Business Forum can also help with messaging on this. ‘The Licensing Policy seeks to encourage premises that will extend the diversity of entertainment and attract a wider range of participants rather than premises mainly or exclusively focussed on the sale of alcohol’ is very much in line with the recommendations of the Wood Green NTE report. 5 Planning, Regeneration and Building Regulations regimes Under this section ‘This Authority will look to ensure proper integration with the planning regime’, it would be good to explore in practical terms how this can be done. Might there be scope to coordinate initial responses (with Inclusive Economy	We generally encourage operators to read the advice on the website and on GOV.UK. if they have any additional queries, they can contact us to discuss. Businesses are also well signposted to various licensing agents/solicitors etc through hospitality trade information. This is set out in the policy. There is of course scope for Inclusive Economy to be involved in outreach to help build and shape the borough’s economy, a byproduct of which may well be applications for licensing of licenseable activities. Planning is however already a Responsible Authority under the regulations; Inclusive Economy is not. Representations can only be considered in the application process insofar as they relate to one of the four Licensing Objectives:	No change to policy No change to policy
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	support) to streamline the application processes/make it easier for businesses?	• the prevention of crime and disorder • the promotion of public safety • the prevention of public nuisance; and • the protection of children from harm The application process itself is laid down by law and it is not open to the Council to streamline it any significant way. If an RA or residents make a valid representation it is shared with the applicant by law and they are able to respond in their own way as to how they will allay the concerns raised or meet the requirements set out by the RA. Both parties are assisted by Licensing which takes a neutral stance throughout the process. If the parties cannot reach agreement, then the matter is taken to the LSC for determination. The two regimes (Licensing and Planning) are two separate statutory systems with their own statutory rules, criteria, policies and guidance, looking at different aspects of similar proposals, and where the Council is the decision-maker in both cases. They involve consideration of different (albeit related) matters. Because of this, it will not be the case that the same decisions will always be made. While both systems may be made aware of the decisions made by the other, they do not bind each other or create any presumption that a particular decision will be made. From a licensing perspective we advise	
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		applicants, Responsible Authorities and Persons making representations to concentrate on the considerations material to the licensing or planning decision (as the case may be) in hand.	
	5.10 Late Night Economy 'Premises trading beyond midnight pose the greatest risk of undermining the licensing objectives. We want to positively support well managed businesses that will contribute to the borough's growing vibrant and diverse evening economy.' It would be helpful to explore how businesses can be positively supported, through access to advice/training perhaps? – worth adding a reference to Ask for Clive as specifically related to LGBTQ+ patrons.	The Licensing role is about the business demonstrating how they will be upholding and promoting the four licensing objectives. We provide extensive advice/guidance in the policy under each of the objectives and examples of potential conditions to mention in the Operating schedule	No change to policy
	2. VAWG How might licensed alcohol-led businesses notify authorities if they or their staff suspect	Noted Materially different considerations apply to Haringey and Hackney	No change to policy

	someone is a victim of domestic abuse. In Hackney for instance, to be an accredited Hackney Nights business they need to take a zero tolerance approach to hate, harassment and any form of violence against women. - is there a possibility of a 'high standards of management' accreditation (like Hackney Nights) and to add something like 'can demonstrate a zero-tolerance approach to hate, harassment or any form of violence against women' in to the policy text? It does mention Best Bar None further into the policy, but it would be good to explore something Haringey specific. 17 – do we currently have any areas of local saturation, or areas close to becoming so? If so, should we make reference to them? Major Events at THFC/FP – is there a specific reason Alexandra Palace is also not referenced? Is this due to its distance from residences/businesses, so different issues apply? Are there any issues that do apply?	Hackney has an issue of over saturation of late night venues that are alcohol led and licenses sex entertainment venues; whereas Haringey has a food led evening economy and does not licence sex entertainment venues. (NB: Haringey has rolled out Ask for Angela and Safe Space in conjunction with the Police). Anyone applying for a Premises Licence is already signing up to say that they are going to conduct their business with regard to the four licensing objectives. Haringey operates the Responsible Retailer Scheme which at the moment targets Off licences and supermarkets as we have high numbers of these types of premises and they are able to sign up to various codes of conduct under that scheme. It can be extended to other alcohol licensed premises but will need resourcing/budget. No, we are not declaring any areas of saturation under a Cumulative Impact Assessment at this time. Imposing a CIA on an area means that new business will find it very difficult to obtain a licence and existing business variation of their existing licence to get later hours as there is a presumption of refusal once a CIA is declared. this was referring to major events in particular so events over 15k capacity – AP is normally 10k, but I will include them as they hold the annual outdoor Kaleidoscope	No change to policy Already includes AP but made that clearer. No change to policy
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	Under Venue Safety – Martyn’s Law references need to be updated to reflect its passing. 23 Guide to Licensing Policy Is there scope for Licensing to adopt the same approach to Planning and have an officer dedicated to a ‘pre-application’ stage, even at a charge, so when the full application comes in all of the groundwork has been done first. This will also help the applicant / business understand their roles and responsibilities through educating (as mentioned earlier in the policy) rather than wait until they do something wrong - and have this added to section 23.	event now since the policy was last done. Amendment made to policy. this is mentioned under Venue Safety and Assessment of Risk at Venues and Events Understanding of roles and responsibilities is an ongoing conversation that we have with business. Often businesses that pay a licensing agent or solicitors to submit an application for them do not fully understand what they have been signed up for or even read the terms of their licence once they receive it. The conversation about roles and responsibilities is an ongoing one for us on a day to day basis with businesses. Businesses are provided with help and advice free of charge prior to submitting an application. That does not stop representations from being made against the application. We have looked at the possibility of offering a paid for advisory, but this would need to undertaken by staff that was not administering the application process and presenting any contested application to the Licensing Sub Committee. Additional resource would be required in the team.	No change to policy
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	Contact Details – RPH reference needs updating.	The business operator may still do something wrong once the licence is granted. The enforcement process then kicks in, a business is first spoken, and officers discuss at length with the licence holder what is going wrong and the impact it is having on nearby residents/ any breach of licence condition and objectives. This is followed up with an advisory letter. Further complaints will lead to a warning letter. If the issues continue then the business is put on notice for a review and or prosecution. These actions may take place over a few weeks or months depending on the severity of the problems that is being caused. RA addresses updated	Amendments made.
Residents			
	On High Streets and retail parks, the Council need to be more supportive of businesses who want to extend their hours and help build a stronger night time economy in Haringey. There should be a note to support these areas.	<i>The approach aligns with the requirements of the Licensing Act and section 182 guidance. No change is proposed for the SLP.</i>	<i>No change is proposed for the SLP</i>
	More support needs to be provided to long established licensed premises.	<i>No change is proposed for the SLP. The approach aligns with the requirements of the Licensing Act and section 182 guidance. No change is proposed for the SLP.</i>	<i>No change is proposed for the SLP</i>
	The policy seems more weighted to greater protective measures than increasing the economic benefits from the hospitality sector. It needs a better overall balance. There is little analysis of the	Policy is not about economic gain <i>The Policy does not imply preferential treatment.</i>	<i>No change is proposed for the SLP</i>

	present economic benefits the licenced sector brings to Haringey. For example no statistics on how many jobs the sector creates through its 120 pubs and related small brewery sector (e.g Bohem, Redemption, Goodness, and Jiddlers Tipple etc) that supply many of the bars. I'd estimate over 2,000 people in full and part time employment. Some acknowledgement of the economic challenges the hospitality sector is facing at present. Haringey has lost 40 % of its pubs since 2000. CAMRA statistics show one pub is closing for good each week. This is caused by higher costs minimum wage and NI increases, inflation, ongoing impact of Covid period when pubs couldn't trade effectively for over a year, changed drinking habits (it is much cheaper to buy alcohol in supermarkets) and less disposable income. With a fragile economic sector more controls will add greater pressure and may lead to more business failures. The policy should acknowledge that many of the antisocial issues are caused by the sale of cheap alcohol in supermarkets and not from well managed licenced premises with effective management. Pubs are a controlled environment and much better places for the public to drink than on the streets. There needs to be action by the government to ensure lower rates of duty apply to alcohol consumed in pubs so the price differential is reduced between them and shops and Haringey should support	<i>Receipt of Early applications may help resolve issues with responsible authorities quicker so that the applicant can have ample time to implement measures that may be required.</i> <i>No change is proposed for the SLP.</i>	<i>No change is proposed for the SLP</i>
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	this aim. The policy seems to be grudging about Government and the Mayor of London's policy to encourage more alfresco drinking that was encouraged by the Business and Planning Act 2020. Haringey doesn't seem to want to embrace this and make it work sensibly. Also I worry (as the Night Time Economy rep for Tottenham Traders Partnership) that there is nothing in the policy to promote this part of the economy and the culmulative greater restrictions will add further to the demise of this part of the licensed sector. I think there is a deficit in the night time economy in Haringey. There are fewer and fewer late venues so this negatively impacts on the economic benefits from people coming into the borough. Contrast Haringey with Camden, Hackney/Shoreditch, Brixton etc. The night time economy needs to be developed in a sensitive way. We'll have people coming to the Rebel Borough and finding there is no where to go later on. When we close our pub by 11 we often have groups who want to go on somewhere else but we have to say there is nothing nearby. One of the key issues around disorder arising from licenced premises relates to a single group in the community - the traveller community. Socialising with alcohol is ingrained in their culture. Unfortunately this can lead to anti social		<i>No change is proposed for the SLP</i>
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	behaviour. The North Eight pub losing its licence illustrates the issues. ***** *** Personal details have been removed *** can brief you on this. Haringey should try and address how this issue can be managed. The negative views arising from the problems with this group perhaps mean there is a tendency to apply greater controls to the whole of the licensed sector which is unfortunate and disproportionate for the rest of us who operate bars.		
	There is too much rubbish drinking bottles left outside on streets and parks and drunk people especially during events. Businesses should be responsible to keep areas around theirs shops clean .	Noted. License holders are encouraged to prevent nuisance.	<i>No change is proposed for the SLP</i>
	There are too that are open late into the night in my area (Bruce Grove). There needs to be a better balance between public health and recreation. I use my local licensed premises (shops, pubs, restaurants and other venues) but more safeguards are required to protect the most vulnerable and prevent escalation of health and social issues. Venue licences should be considered in context of what else is in the area. In Bruce Grove we have a high concentration of betting shops combined with shops that	Noted	<i>No change is proposed for the SLP</i> <i>No change is proposed for the SLP</i>

	are selling cheap alcohol 24 hours a day or late into the night/morning. This is a really harmful combination. We don't need more shops offering cheap alcohol to vulnerable people. Alcohol licences need to be particularly restricted when in the context of gambling. There is plenty of research showing the harm related to this and public health measures are incredibly effective at reduce risk from both alcohol and gambling. You need to look at the ratio of premises serving alcohol after 11pm, particularly in areas that are quite deprived. Bruce Grove needs particular attention. It is right next to the drug and alcohol treatment service. There are so many shops selling alcohol late at night. People go in for substance use treatment and they come out into an area flooded with triggers 24 hours. When I walk down Tottenham High Road, there are so many people who are experiencing homeless and clearly drinking cheap alcohol from these establishments. They struggling to regulate their emotions and often get involved in arguments etc. Why increase the risk with an already vulnerable population? Please start putting restrictions on licences for shops selling alcohol after 10pm in areas of high deprivation.	Noted	<i>No change is proposed for the SLP</i>
	Non-pub licensed premises should be differentiated from pubs (which should	Noted	<i>No change is proposed for the SLP</i>

	have more leeway, as they are an institution important for social bonds). Limiting betting shops and the kind of betting machines in those shops is as important.		
	Wood Green is filled with money laundering cafes, barbers and low quality shops something needs to be improved to stop supporting crime		<i>No change is proposed for the SLP</i>
	Greater checks on retail premises selling alcohol at night.	Noted	<i>No change is proposed for the SLP</i>
	Speaking for Woodgreen, Tottenham. The variety is poor. And not always welcoming. It has some. But being honest, I for a more special evening, I would venture to Hackney or Islington. A lot of Haringey lacks a spark. Not in my experience. I have frequented many bars/pubs. I have not witnessed much anti-social behavior. Speaking of Tottenham. Look at places which are generally very popular. True Craft on West Green road. Very busy. The High Cross. The Palm. The Post Bar is OK, but is Latin music led so tend to visit infrequently. There isn't that type of hipster type bar which could have live music. What is also lacking is that intimate type bistro affair. So I heard (not sure if true) that you knocked back licensing for With milk. A popular cafe on Philip Lane. If that turned to a more wine bar type affair after 3pm,	Noted Noted. This policy does not deal with street trading matters.	<i>No change is proposed for the SLP</i> <i>No change is proposed for the SLP</i>

	then great. And why licensing would be denied is weird. The Tottenham Market. The previous person who ran the market told me that you offer just 6 week licenses to traders. That may have changed now. It deters traders. Other boroughs offer a one year license which they can use as they wish.		
	I think more should be done to promote the growth of the night time economy. For example, more venues/businesses/events can be licenced to be open for longer than they are currently in the evening/night; without extending their alcohol licences for longer/during the extended times they're open for. - specifically: regarding "prevention of crime..." section, said plastic glasses/vessels should be made of reusable and/or recyclable plastics/materials - generally: personal motor vehicle parking related to these licenses should be more strictly regulated and charged at higher prices	Noted Noted	No change to policy
	'Residents and businesses can play an important role in the licensing process'. However there are inadequate arrangements for informing the community, which could easily be improved. Local residents and businesses only get to know about applications if they see the A4 notice	<i>The policy approach aligns with the requirements of the Licensing Act and section 182 guidance. No change is proposed for the SLP.</i>	<i>No change is proposed for the SLP</i>

	or the publication in the press. There is no notification to neighbours as for planning applications. This could easily be improved by allowing residents and businesses to be included, on application, in the circulations to ***** mentioned Such an arrangement should be introduced in this policy.		
	Not an issue in my experience. But there is always the caveat that venues are properly managed Important for the local economy and for the financial viability of community organisations/sports clubs.	Noted	
	Through out the borough. You current policy is to grant licence to each and every retail business a licence, especially one that remains open 24/7 and to venues where there is no suitable parking, causing congestio and anti social behavoiur Have stronger enforcement. No licenced premises at or near transport hubs.schools	<i>The approach aligns with the requirements of the Licensing Act and section 182 guidance. No change is proposed for the SLP.</i>	<i>No change is proposed for the SLP</i>
	Yes, I had a read through the draft Licensing Policy, and I was concerned that real strict checks should be enforced at stripteases venues, making sure the people striping off are fully in control of their decisions and in their proper mind agreed do do so, and NOT as slave labour. Best that police interviews and issue	Noted	<i>No change is proposed for the SLP</i>

	councillors and then join the licensing who are either against drinking or who are prejudice in the first place. Also councillors have no experience of venue ownership which makes them clueless. Also a lot of licensing officers have serious chips on their shoulders.		
	Sort out those cafes that have groups men sitting outside so fearful for young women	Noted	<i>No change is proposed for the SLP</i>
	It seems to continue the current trend of the council trying to dictate how residents can live their lives whilst making things more difficult and restricted for businesses. It stinks of another money-grab to charge businesses money for nothing. Haringey seems determined to push an ethnic gentrification scheme- enacting policies to favour upper-middle class work-from-home types and force out the lower classes, tradesmen and those from the 'unsavoury' countries whose culture and businesses seem to be unwelcome here. This policy will be used to discriminate against businesses/venues that don't appeal to the limited new gentrified base and try to force an unwelcome cultural dogma which is well beyond the councils remit. The council is there to serve the people, not dictate to them	Noted Noted	<i>No change is proposed for the SLP</i> <i>No change is proposed for the SLP</i>
	Licences for Music festivals in Finsbury park should be terminated due to noise and inability to use the park by locals.	Noted	<i>No change is proposed for the SLP</i>

Overview & Scrutiny			
	- Who had been involved in the consultation phase along with themselves to which they heard the police, Public Health, businesses, trade associations, resident associations and community groups were also consulted. - Whether the policy would be reviewed again within the five-year period following enforcement to which they were informed it would and in particular once Martins Law is enforced. - What provision would be made for events at Tottenham stadium and Finsbury park which they learned that there was a specific section focussed on larger events and venues in the borough and that this is a public safety protection order outside of the premises and retailers are reminded to be mindful about how they retail alcohol responsibly on match days. - Whether there was enough resource in the borough to manage the		No change to policy for any matters from O&S.

	enforcement of the policy and the scrutiny panel heard, in order to manage limited resources they worked closely with the police Public Health and the Anti-social Behaviour Team and the intel from residents and elected councillors was invaluable.		
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