

|                                                     |                                                                                                                                                                                                                                                                                                               |
|-----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Responsible Authority:</b>                       | Haringey Public Health, London Borough of Haringey                                                                                                                                                                                                                                                            |
| <b>Date:</b>                                        | 25 <sup>th</sup> June 2026                                                                                                                                                                                                                                                                                    |
| <b>Name:</b>                                        | Maria Ahmad, Public Health Officer for Health Improvement<br>Marlene D'Aguilar, Health In All Policies Strategic Lead                                                                                                                                                                                         |
| <b>Contact:</b>                                     | <a href="mailto:Maria.Ahmad@haringey.gov.uk">Maria.Ahmad@haringey.gov.uk</a><br><a href="mailto:Marlene.DAguilar@haringey.gov.uk">Marlene.DAguilar@haringey.gov.uk</a>                                                                                                                                        |
| <b>Public Health representation in relation to:</b> | INTERNATIONAL SUPERMARKET, 455-457 HIGH ROAD, TOTTENHAM, LONDON, N17 6QB<br><br>Late Night Refreshment<br>Monday to Sunday 0000 to 2359 hours<br>Sale of Alcohol<br>Monday to Sunday 0000 to 2359 hours<br>Supply of alcohol OFF the premises.<br>Hours open to Public<br>Monday to Sunday 0000 to 2359 hours |

As a representative of the Director of Public Health we 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.

Public Health would like to address specific concerns on the following licensing objective(s):

- Prevention of Crime & Disorder
- Public Nuisance
- Protection of Children from Harm

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.

Public Health object to this application due to the proposed 24-hour and late-night availability of alcohol.

The premises is located on High Road N17, a busy pedestrian area serving a range of local shops. High Road N17 is a principal A-road with multiple bus stops in close proximity to the premises. There are several late-night off-licences, on-licensed premises, and gambling venues in the surrounding area, which contribute to increased footfall during late hours. There are currently no 24-hour off-licences in the vicinity. The grant of such hours at this location could set a precedent for other premises seeking to extend alcohol sales beyond midnight into the early hours.

The Metropolitan Police Service (MPS) Crime Prevention Environmental Visual Audit for St Loy's Road (junction with High Road N17) carried out by the Metropolitan Police's Crime Prevention unit identifies elevated levels of anti-social behaviour (ASB), including activity associated with street drinking and drug dealing. This activity has been noted on St Loy's Road, located approximately one street away from Forster Road and in close proximity to the proposed premises.

A pedestrian footpath runs behind residential properties on St Loy's Road, passing under a railway arch behind Tottenham Fire Station and connecting directly to Forster Road, a nearby residential street. The proposed premises are situated on High Road N17, close to these connecting side streets, creating a clear pedestrian link between the identified ASB location and the vicinity of the premises.

This connectivity increases movement between these locations and raises the potential for the displacement of anti-social behaviour into the immediate vicinity of the premises. As a result, local residents may be at risk of sleep disturbance and reduced wellbeing due to the dispersal of customers late at night. The cumulative impact of existing late-night uses further increases the likelihood of noise, disturbance, and anti-social behaviour affecting the area.

Evidence shows that extended hours of alcohol availability are associated with increased alcohol-related harm and public nuisance, particularly at closing times<sup>1</sup>.

### Public Health Evidence

The Lower Super Output Area (LSOA) in which the premises is located demonstrates several indicators associated with alcohol-related harm and wider health inequalities.

Using data from the **Alcohol Harms Licensing Toolkit (2024/25)**:

- There were **12 alcohol-related ambulance callouts** within the LSOA, comparable to the Haringey average.
- **66.7% of alcohol-related ambulance callouts occurred between 11:00pm and 5:00am**, placing the area within the **highest quartile** for late-night alcohol-related harm and indicating a disproportionate concentration of incidents during the night-time economy period.

---

<sup>1</sup> Dimova, E, et al, (2023) Exploring the influence of local alcohol availability on drinking norms and practices: A qualitative scoping review. Access: <https://pmc.ncbi.nlm.nih.gov/articles/PMC10946767/>

- The LSOA has a **higher-than-average density of licensed premises**, containing **4 on-licensed premises** and **17 off-licensed premises**.

Additional local public health indicators demonstrate existing vulnerability in the borough:

- There are currently **457 adults receiving treatment for alcohol use in Haringey**.
- Haringey recorded **19 alcohol-specific deaths during 2025/26**.
- Between April 2026 and May 2026, **272 crime incidents were reported in Tottenham Central Ward**, representing a **30.5% increase** compared to the previous month.

Table 1. Police-recorded crime incidents reported immediately outside the premises location (Met Police Data, 2026).

| Month      | Total incidents | Crime categories                                                                |
|------------|-----------------|---------------------------------------------------------------------------------|
| March 2026 | 3               | Violence and sexual offences (2), Shoplifting (1)                               |
| April 2026 | 6               | Public order (2), Criminal damage and arson (1), Drugs (1), All other crime (2) |

Police-recorded incidents at the premises location increased from 3 to 6 between March and April 2026. The presence of public order, drug-related and violence-related offences indicates existing crime and disorder issues within the immediate vicinity of the premises.

### Vulnerabilities

This particular LSOA within the Tottenham Central Ward falls within the **10% most deprived areas in England** based on measures including income, employment, education, health, housing and access to services. This is particularly relevant as the Haringey Alcohol Strategy 2025–2029 identifies alcohol-related harm as disproportionately affecting residents living in the most deprived communities and recognises that alcohol use can compound existing vulnerabilities and health inequalities. Public Health therefore considers it important that licensing decisions take account of the potential impact on communities already experiencing significant disadvantage and alcohol-related harm.

- Napclan Pharmocare Pharmacy (less than 0.1 miles) provides services for individuals with health and substance misuse needs, and may therefore be frequented by vulnerable adults.
- The Grove drug support service (0.2 miles) provides support for individuals affected by substance misuse.

- BUBIC drug support service (0.2 miles) is a community-based drug and alcohol support service providing peer support, one-to-one advice, support for carers, and recovery-focused activities for individuals experiencing substance misuse.
- There are 10 educational establishments within approximately 0.55 miles of the premises, comprising 4 primary schools, 1 infant school, 1 junior school, 1 secondary academy, 1 sixth form institution and 2 further education colleges. This indicates a substantial presence of children and young people within the local area.

The premises is situated in close proximity to a number of services supporting individuals affected by substance misuse and related health issues. These locations may be frequented by vulnerable adults and are therefore relevant when considering the potential impact of increased alcohol availability on the local community.

### Conditions

If this application is to be granted, the Public Health team recommends that the following additional conditions be attached, in addition to those proposed within the operating schedule, to minimise any potential harm to our residents.

1. **Public Health recommends that the commencement time for alcohol sales be amended to 09:00 hours rather than 00:00 hours. This would reduce the overall availability of alcohol and limit access during the early morning period in an area already experiencing significant alcohol-related harm and high levels of deprivation.**
2. **Public Health also recommends that the terminal hour for alcohol sales be limited to 00:00 (midnight).**

This recommendation is made in light of local concerns relating to alcohol-related harm, street drinking, anti-social behaviour and crime. Local data indicates that 66.7% of alcohol-related ambulance callouts within the LSOA occur between 11:00pm and 5:00am, demonstrating a disproportionate concentration of alcohol-related harm during late-night hours.

Furthermore, evidence reviewed by Fitzgerald et al. (2024) indicates that reduced late-night trading hours are likely to reduce alcohol-related violence, while there is limited evidence that such measures adversely affect hospitality businesses.<sup>2</sup>

Whilst recognising the economic role of licensed premises, the available local and research evidence suggests that later alcohol availability may increase the potential for alcohol-related harms and undermine efforts to improve population health. Public Health therefore considers the proposed reduction in terminal hours to be appropriate and proportionate in

<sup>2</sup> Fitzgerald, N., et al. (2024) *Reducing alcohol harms whilst minimising impact on hospitality businesses: 'Sweetspot' policy options*. *International Journal of Drug Policy*, 129, Article 104465. Available at: <https://doi.org/10.1016/j.drugpo.2024.104465> (Accessed: 22 June 2026)

support of the licensing objectives of preventing crime and disorder, preventing public nuisance and protection of children from harm.