



# Havering

L O N D O N   B O R O U G H

## LICENSING SUB-COMMITTEE MAGS NEWSAGENT

### AGENDA

<b>10.30 am</b>	<b>Monday 22 September 2025</b>	<b>Council Chamber - Town Hall</b>
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Members 3: Quorum 2

**COUNCILLORS:**

Philippa Crowder (Chairman)  
Jane Keane  
Christine Smith

**For information about the meeting please contact:**

**Taiwo Adeoye - 01708 433079  
taiwo.adeoye@onesource.co.uk**

**Please would all Members and officers attending ensure they sit in their allocated seats as this will enable correct identification of participants on the meeting webcast.**

***Under the Committee Procedure Rules within the Council's Constitution the Chairman of the meeting may exercise the powers conferred upon the Mayor in relation to the conduct of full Council meetings. As such, should any member of the public interrupt proceedings, the Chairman will warn the person concerned. If they continue to interrupt, the Chairman will order their removal from the meeting room and may adjourn the meeting while this takes place.***

***Excessive noise and talking should also be kept to a minimum whilst the meeting is in progress in order that the scheduled business may proceed as planned.***

### **Protocol for members of the public wishing to report on meetings of the London Borough of Havering**

Members of the public are entitled to report on meetings of Council, Committees and Cabinet, except in circumstances where the public have been excluded as permitted by law.

Reporting means:-

- filming, photographing or making an audio recording of the proceedings of the meeting;
- using any other means for enabling persons not present to see or hear proceedings at a meeting as it takes place or later; or
- reporting or providing commentary on proceedings at a meeting, orally or in writing, so that the report or commentary is available as the meeting takes place or later if the person is not present.

Anyone present at a meeting as it takes place is not permitted to carry out an oral commentary or report. This is to prevent the business of the meeting being disrupted.

Anyone attending a meeting is asked to advise Democratic Services staff on 01708 433076 that they wish to report on the meeting and how they wish to do so. This is to enable employees to guide anyone choosing to report on proceedings to an appropriate place from which to be able to report effectively.

Members of the public are asked to remain seated throughout the meeting as standing up and walking around could distract from the business in hand.



## **AGENDA ITEMS**

### **1 APOLOGIES FOR ABSENCE AND ANNOUNCEMENT OF SUBSTITUTE MEMBERS**

(if any) - receive

### **2 DISCLOSURE OF INTERESTS**

Members are invited to disclose any interest in any of the items on the agenda at this point of the meeting.

*Members may still disclose any interest in an item at any time prior to the consideration of the matter.*

### **3 CHAIRMAN'S ANNOUNCEMENT**

The Chairman will announce details of the arrangements in case of fire or other events that might require the meeting room or building's evacuation.

### **4 REPORT OF THE CLERK (Pages 5 - 10)**

Procedure for hearing attached – Licensing Act 2003

### **5 APPLICATION TO VARY A PREMISES LICENCE - MAGS NEWSAGENT 63 CHIPPENHAM ROAD, ROMFORD, RM3 8HL (Pages 11 - 66)**

Documents attached

**Zena Smith**  
**Head of Committee and Election Services**



## LICENSING SUB-COMMITTEE

22 September 2025

## REPORT

**Subject Heading:**

**Procedure for the Hearing:  
Licensing Act 2003**

**Report Author and contact details:**

**Taiwo Adeoye – Committee Officer -  
01708 433079**

Members are advised that, when considering an application to vary a premises licence, the following options are available to them by virtue of the Licensing Act 2003, Part 3, section 35, paragraphs 3 and 4:

"Where relevant representations are made, the authority must

- (a) hold a hearing to consider them, unless the authority, the applicant and each person who has made such representations agree that a hearing is unnecessary, and
- (b) having regard to the representations, take such steps as it considers necessary for the promotion of the licensing objectives.

The steps are:

- a) modify the conditions of the licence
- b) reject the whole or part of the application

and for this purpose, the conditions of the licence are modified if any of them is altered or omitted or any new condition is added."

The Sub-Committee will also wish to note that, if none of these steps is required, the application must be granted.

Assuming that the Sub-Committee is satisfied that a hearing is required, then the following procedural steps are recommended. The Licensing Act 2003 (Hearings) Regulations 2005 will govern the arrangements for the hearing of the application now under consideration. This report accords with the requirements of that Act and the Regulations, and in particular Regulations 21-25 (procedure at the hearing).

## **1. Membership of the Sub-Committee:**

- 1.1 The Sub-Committee comprises three members of the Licensing Committee, with a quorum of two members. **Unless there are objections, in the absence of three members, the hearing shall proceed with the quorum of two.**
- 1.2 A members of the Licensing Committee will be excluded from hearing an application where he or she:
  - 1.2.1 has considered an application in respect of the premises in the previous 12 months as a Member of the Regulatory Services Committee; or
  - 1.2.2 is a Ward Councillor for the Ward in which the premises, subject to the application, are located; or
  - 1.2.3 is a Ward Councillor for a Ward which is likely to be affected by the application or;
  - 1.2.4 has a personal interest in the application.

## **2. Roles of other participants:**

- 2.1 The Legal Advisor is not a party to the hearing. The role of the Legal Advisor is to provide legal advice relating to the application and submissions.
- 2.2 The Clerk is not a party to the hearing. The role of the Clerk is to record the hearing and the decisions of the Sub-Committee, and ensure efficient administration

## **3. Location and facilities:**

- 3.1 All hearings will be heard at the Havering Town Hall unless otherwise directed.
- 3.2 Interpreters will be provided by the Council on request, provided notice is given at least five working days before the hearing.

#### **4. Notification of attendance:**

- 4.1 The Chairman will enquire of the parties who is in attendance and the parties will indicate their names (and, where relevant, whom they represent). A register will be circulated before the commencement of the hearing on which the applicant, his/her advisers and companions and all interested parties (and/or their representatives) will be asked to record their attendance.

#### **5. Procedural matters:**

- 5.1 Prior to the commencement of the hearing, the Chairman of the Sub-Committee will orally inform the parties whether their applications to have certain people attend the hearing (e.g. witnesses) have been granted or refused. Note this relates to people other than those attending on behalf of a party in the capacity as a representative of the party.
- 5.2 Prior to the commencement of the hearing the Chairman of the Sub-Committee will outline the procedure to be followed at the hearing. This will normally be as follows:

##### **Introduction of the application:**

The Licensing officer will outline:

- details of the application and relevant representations received from the parties;
- relevant legislation;
- relevant Licensing Policy; and
- the time limit in which the Council must reach a determination.

##### **Documentary evidence:**

- Documentary or other information in support of applications, representations or notices should be provided to the Clerk of the Sub-Committee at least 5 clear working days before the hearing. If this information is produced at the hearing it will only be taken into account by the Sub-Committee if the Sub-Committee and all the parties consent to its submission. Permission to have this information included in the hearing should be requested at the beginning of the hearing before any oral submissions have been made.
- Statements made by people in support of a party's representation who are not present at the hearing, must be signed by the maker, dated and witnessed by another person. The statement must also contain the witness's full name and occupation.

**Representations:**

- The chairman will invite each of the parties at the hearing or their representative sequentially to address the Sub-Committee and call any person/s to whom permission has been granted to appear. Each party will be allowed a maximum period of 10 minutes in which to address the Sub-Committee and call persons on his/her behalf.
- This 10-minute period is where each party has the opportunity to orally address the Sub-Committee and clarify any points in which the Sub-Committee has sought clarification prior to the hearing. This 10-minute period should be uninterrupted unless a member of the Sub-Committee or Legal Advisor considers that the speaker is making submissions that are irrelevant, frivolous or vexatious.
- Members of the Sub-Committee may ask questions of any party, at any time during the proceedings. Time taken in dealing with a Member's question will not be taken into account in determining the length of time available to the party in question to make their representation.

The sequence in which each of the parties will be invited to address the Sub-Committee will normally be in the order of:

- the Chief Officer of Police;
- the Fire Authority;
- the Health and Safety at Work Enforcing Authority;
- the Local Planning Authority;
- the Local Environmental Health Authority;
- the Local Weights and Measures Authority;
- the Authority Responsible for the Protection of Children from Harm;
- a navigation or other authority responsible for waterways; and
- any other party that has submitted representations in respect of the application, certificate, notice or other matter appearing before the Sub-Committee;
- the party that has submitted the application, certificate, notice or other matter appearing before the Sub-Committee.

At the discretion of the Sub-Committee the above order may be varied.

**Cross-Examination:**

Where witnesses have been permitted by the Sub-Committee to speak at the hearing on behalf of a party, permission must be sought from the Sub-Committee before another party can ask the witness questions. This process of questioning is normally referred to as cross-examination. The Sub-Committee will allow cross-examination only



where it is necessary to assist it in considering the representations or application.

**Relevance:**

Information submitted at the hearing must be relevant to the applications, representations, or notice and the promotion of the licensing objectives. The Chairman of the Sub-Committee is entitled to exclude any information it considers to be irrelevant whether presented in written or oral form. The licensing objectives are:

**The prevention of crime and disorder;**

**Public safety;**

**The prevention of public nuisance; and**

**The protection of children from harm.**

**6. Failure of parties to attend the hearing:**

- 6.1 If a party, who has not given prior notice of his/her intention not to attend the hearing, is absent from the hearing the Sub-Committee may either adjourn the hearing or hold the hearing in the party's absence. Where the hearing is held in the absence of a party, the Sub-Committee will still consider the application, representation or notice submitted by that party.

**7. Adjournments and extension of time:**

- 7.1 The Sub-Committee may adjourn a hearing to a specified date or extend a notice period except where it must make a determination within certain time limits in the following specific applications:
- Review of premises licences following closure orders where the Sub-committee must make a determination within 28 days of receiving notice of the closure order.

**8. Sub-Committee's determination of the hearing:**

- 8.1 At the conclusion of the hearing the Sub-Committee will deliberate in private accompanied by the Clerk and the Legal Advisor who will be available to assist the Sub-Committee with any legal problems but will not participate in any decision making of the Sub-Committee.

- 8.2 The Sub-Committee will normally make its determination at the end of the hearing. The notice of the decision of the Sub-Committee will be circulated to all participants within five working days of the hearing.
- 8.3 Where all parties have notified the Sub-Committee that a hearing is not required the Sub-Committee must make its determination within 10 working days of being given notice that the hearing is not required.

**9. Power to exclude people from hearing:**

- 9.1 The public are entitled to attend the hearing as spectators. However, the Sub-Committee may exclude any person from the hearing including any person assisting or representing a party where:
- it considers that the public interest would be best served by excluding the public or the individual person from the hearing; or
  - that person is behaving in a disruptive manner. This may include a party who is seeking to be heard at the hearing. In the case where a party is to be excluded, the party may submit to the Sub-Committee in writing any information which they would have been entitled to give orally had they not been required to leave the hearing.

**10. Recording of proceedings:**

- 10.1 A written record of the hearing will be produced and kept for 6 years from the date of the determination of the hearing.

**11. Power to vary procedure:**

- 11.1 The Sub-committee may depart from following any of the procedures set out in this document if it considers the departure to be necessary in order to consider an application, notice or representation.



Licensing Officer's Report

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# LICENSING SUB-COMMITTEE

# REPORT

22 September 2025

Subject heading:

Mags Newsagent

63 Chippenham Road Romford

RM3 8HL

Variation of a premises licence

Report author and contact details:

Paul Jones, Public Protection Officer

[licensing@havering.gov.uk](mailto:licensing@havering.gov.uk)

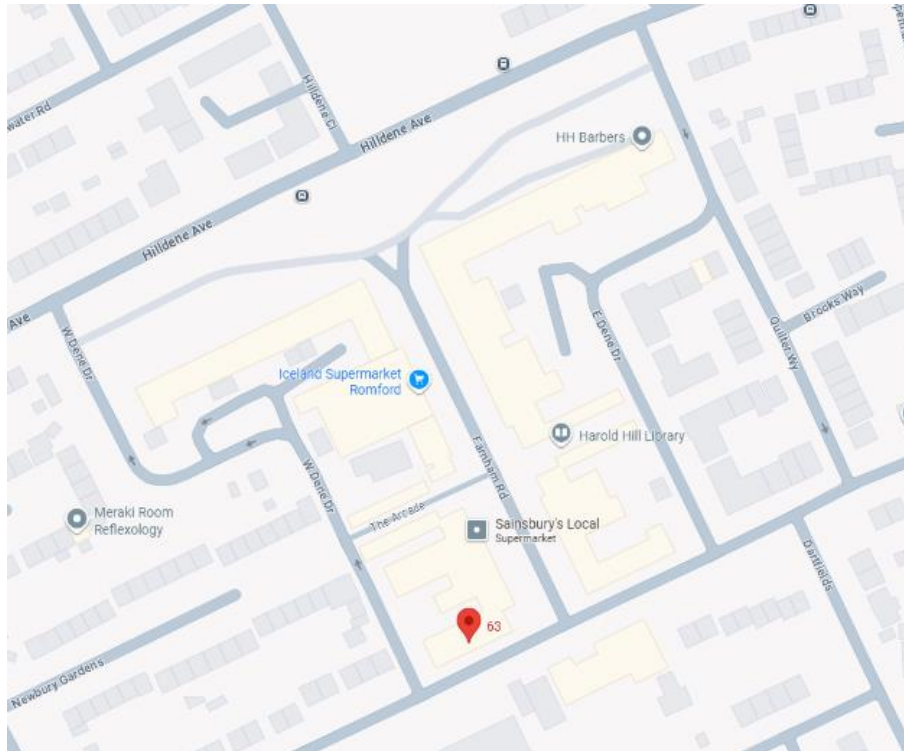
01708 432777

This application to vary a premises licence is made by Mr Pankajkumar Raojibhai Patel under section 34 of the Licensing Act 2003. The application was received by Havering's Licensing Authority on 29<sup>th</sup> July 2025.

## Geographical description of the area and description of the building

Mags Newsagent is located in a parade of commercial units close to the Hilldene shopping parade. The area in which this premises is located is deemed a cumulative impact zone further to alcohol supplies by the Licensing Authority. Above the premises are located residential properties. The area may therefore be considered one of mixed use.





### Details of the application

The premises licence currently permits off-supplies of alcohol from 08:00 to 19:00 Monday to Saturday and 08:00 to 15:00 Sunday.

The application seeks to extend the alcohol supply hours from 08:00 to 21:00 Monday to Sunday.

The application also wishes to modify annex 2 condition 6 as follows:

- No high strength beers, lagers, and ciders above 8% ABV shall be stocked or sold at the premises.

The application also wishes to add the following condition to the ambit of the licence:

- Cans and bottles will be labelled with the address and name of the premises so as to enable tracing of any street drinking, littering or other anti-social behaviour that may be tied to alcohol purchased from the premises.

### Summary

There were no representations against this application from residents or neighbouring businesses.

There were two representations against this application from responsible authorities, namely the Licensing Authority and the Police.



## Part A

Premises licence number

28185

### Part 1 – premises details

Postal address of premises

Mags Newsagents  
63 Chippenham Road Romford RM3 8HL

Where the licence is time limited the dates

Not applicable

Licensable activities authorised by the licence

Supply of alcohol

The times the licence authorises the carrying out of licensable activities

Monday to Saturday – 08:00 to 19:00  
Sunday – 08:00 to 15:00

The opening hours of the premises

Monday to Saturday – 06:00 to 19:00  
Sunday – 06:30 to 15:00

Where the licence authorises supplies of alcohol whether these are on and/or off supplies

Off supplies only

### Part 2

Name, (registered) address, telephone number and email (where relevant) of holder of premises licence

Mr Pankajkumar Raojibhai Patel

1 of 6

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Registered number of holder

Not applicable

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Name, address and telephone number of designated premises supervisor where the premises licence authorises for the supply of alcohol

Mr Pankajkumar Raojibhai Patel

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Personal licence number and issuing authority of personal licence held by designated premises supervisor where the premises licence authorises for the supply of alcohol

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Annex 1 – mandatory conditions

1. No supply of alcohol may be made under the premises licence:
  - (a) at a time when there is no designated premises supervisor in respect of the premises licence, or
  - (b) at a time when the designated premises supervisor does not hold a personal licence or his personal licence is suspended.
2. Every supply of alcohol under the premises licence must be made or authorised by a person who holds a personal licence.
3. (1) The premises licence holder or club premises certificate holder must ensure that an age verification policy is adopted in respect of the premises in relation to the sale or supply of alcohol.  
(2) The designated premises supervisor in relation to the premises licence must ensure that the supply of alcohol at the premises is carried on in accordance with the age verification policy.  
(3) The policy must require individuals who appear to the responsible person to be under 18 years of age (or such older age as may be specified in the policy) to produce on request, before being served alcohol, identification bearing their photograph, date of birth and either—
  - (a) a holographic mark, or
  - (b) an ultraviolet feature.
4. A relevant person shall ensure that no alcohol is sold or supplied for consumption on or off the premises for a price which is less than the permitted price.
5. For the purposes of the condition set out in paragraph 4 —
  - (a) “duty” is to be construed in accordance with the Alcoholic Liquor Duties Act 1979;
  - (b) “permitted price” is the price found by applying the formula —
$$P=D+(D \times V)$$

where —

- (i) P is the permitted price,
- (i) D is the amount of duty chargeable in relation to the alcohol as if the duty were charged on the date of the sale or supply of the alcohol, and
- (iii) V is the rate of value added tax chargeable in relation to the alcohol as if the value added tax were charged on the date of the sale or supply of the alcohol;

2 of 6

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**Annex 1 – mandatory conditions – contd.**

- (c) “relevant person” means, in relation to premises in respect of which there is in force a premises licence —

    - (i) the holder of the premises licence,
    - (ii) the designated premises supervisor (if any) in respect of such a licence, or
    - (iii) the personal licence holder who makes or authorises a supply of alcohol under such a licence;
  - (d) “relevant person” means, in relation to premises in respect of which there is in force a club premises certificate, any member or officer of the club present on the premises in a capacity which enables the member or officer to prevent the supply in question; and
  - (e) “value added tax” means value added tax charged in accordance with the Value Added Tax Act 1994.
6. Where the permitted price given by paragraph (b) of paragraph 5 would (apart from this paragraph) not be a whole number of pennies, the price given by that sub-paragraph shall be taken to be the price actually given by that sub-paragraph rounded up to the nearest penny.
7. (1) Sub-paragraph (2) applies where the permitted price given by paragraph (b) of paragraph 5 on a day (“the first day”) would be different from the permitted price on the next day (“the second day”) as a result of a change to the rate of duty or value added tax.
- (2) The permitted price which would apply on the first day applies to sales or supplies of alcohol which take place before the expiry of the period of 14 days beginning on the second day.

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**Annex 2 – conditions consistent with the operating schedule**

- 1. All staff shall be provided with training in relation to the licensing objectives that are commensurate with their duties. This shall include the individual’s responsibilities, age verification and licensing offences, as appropriate. Details of the training shall be recorded in a personnel file or log book and shall be refreshed at regular intervals.
- 2. A personal licence holder shall be present on the premises and supervise the sale of alcohol throughout the permitted hours for the sale of alcohol.
- 3. Facilities for depositing litter and the collection of litter generated by customers purchasing food and drink shall be available and maintained.
- 4. The premises licence holder shall install, operate and maintain a comprehensive digital colour CCTV system to the satisfaction of the Police. All public areas of the licensed premises including entry and exit points shall be covered. The CCTV system shall record clear images permitting the identification of individuals and in particular enable facial recognition images (a clear head and shoulder image) of every person entering and leaving in any light condition.

3 of 6

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5. The CCTV system shall continually record whilst the premises are open for the provision of licensable activity and during all times when customers remain on the premises. All CCTV equipment must have a constant and accurate time and date generation. All recordings shall be stored for a minimum period of 31 days with date and time stamping on the recorded image. CCTV recordings shall be made available immediately upon the request of an authorised officer of a responsible authority throughout the entire 31 day period. The CCTV system shall be capable of downloading images to a recognisable viewable format. The CCTV system shall capture a minimum of 4 frames per second. The CCTV system shall be fitted with security functions to prevent recordings being tampered with, i.e. password protected.
6. **No high strength beers, lagers or ciders above 6% ABV shall be stocked or sold at the premises.**
7. No single cans of beer, lager or cider may be sold.
8. No spirit miniatures (5cl or 50ml) may be sold.
9. A suitable intruder alarm and panic button shall be fitted and maintained.
10. All reasonable precautions shall be made to keep the public safe on the premises.
11. A fire risk assessment shall be carried out by a competent person and staff shall be trained in fire safety procedures.
12. There shall be a sufficient number of fire exits for the premises.
13. Staff shall be trained in food safety procedures and food safety management documentation will be kept.
14. No person shall be allowed to open any alcoholic beverage or any glass bottled beverage on or in front of the premises.
15. All alcohol stored/sold at the premises must be sourced from a wholesaler registered with HMRC and in possession of an AWRS Unique Reference Number.
16. An incident log shall be kept at the premises and made available for inspection on request to an authorised officer or the Police which shall record the following:
  - (a) all crimes reported to the venue
  - (b) all ejections of patrons
  - (c) any complaints received
  - (d) any incidents of disorder
  - (e) all seizures of drugs or offensive weapons
  - (f) any faults in the CCTV system
  - (g) any refusal of the sale of alcohol
  - (h) any visit by a relevant authority or emergency service
17. A notice asking customers to leave quietly from the premises shall be displayed by the exit/entrance.
18. All deliveries shall take place during the normal working day, i.e. 09:00 to 18:00 daily.
19. Persons identified as drinking alcohol in the immediate area around the premises whether or not they have purchased alcohol from the premises shall be requested to leave the area and if they refuse to do so a report shall be made to the Police. Any person who refuses to leave the area or is identified as causing anti-social behaviour shall be subject to a ban from the premises.

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**Annex 2 – conditions consistent with the operating schedule – contd.**

- 20. A record of banned individuals shall be maintained in the premises and all staff made aware of the persons who are currently banned so that entry may be refused. The record shall be kept available for inspection while the premises are open for trading. A record of banned individuals shall be maintained in the premises and all staff made aware of the persons who are currently banned so that entry may be refused. The record shall be kept available for inspection while the premises are open for trading.**
- 21. A 'Challenge 25' scheme shall be adopted in compliance with the age verification conditions: customers who appear under 25 years of age shall be required to prove their age when purchasing alcohol. Suitable forms of identification shall be a passport, a 'PASS' card or other identification recognised by the licensing authority in its statement of licensing policy.**
- 22. Prominent, clear notices about the supply of alcohol to minors and the relevant offences involved shall be displayed at the premises.**
- 23. All reasonable steps shall be taken by the venue to prevent customers congregating outside the premises.**
- 24. Crime prevention notices and advice shall be displayed (if advised by the Metropolitan Police) in order to support crime prevention initiatives.**
- 25. Appropriate signage shall be displayed in prominent positions informing customers they are being recorded on CCTV.**

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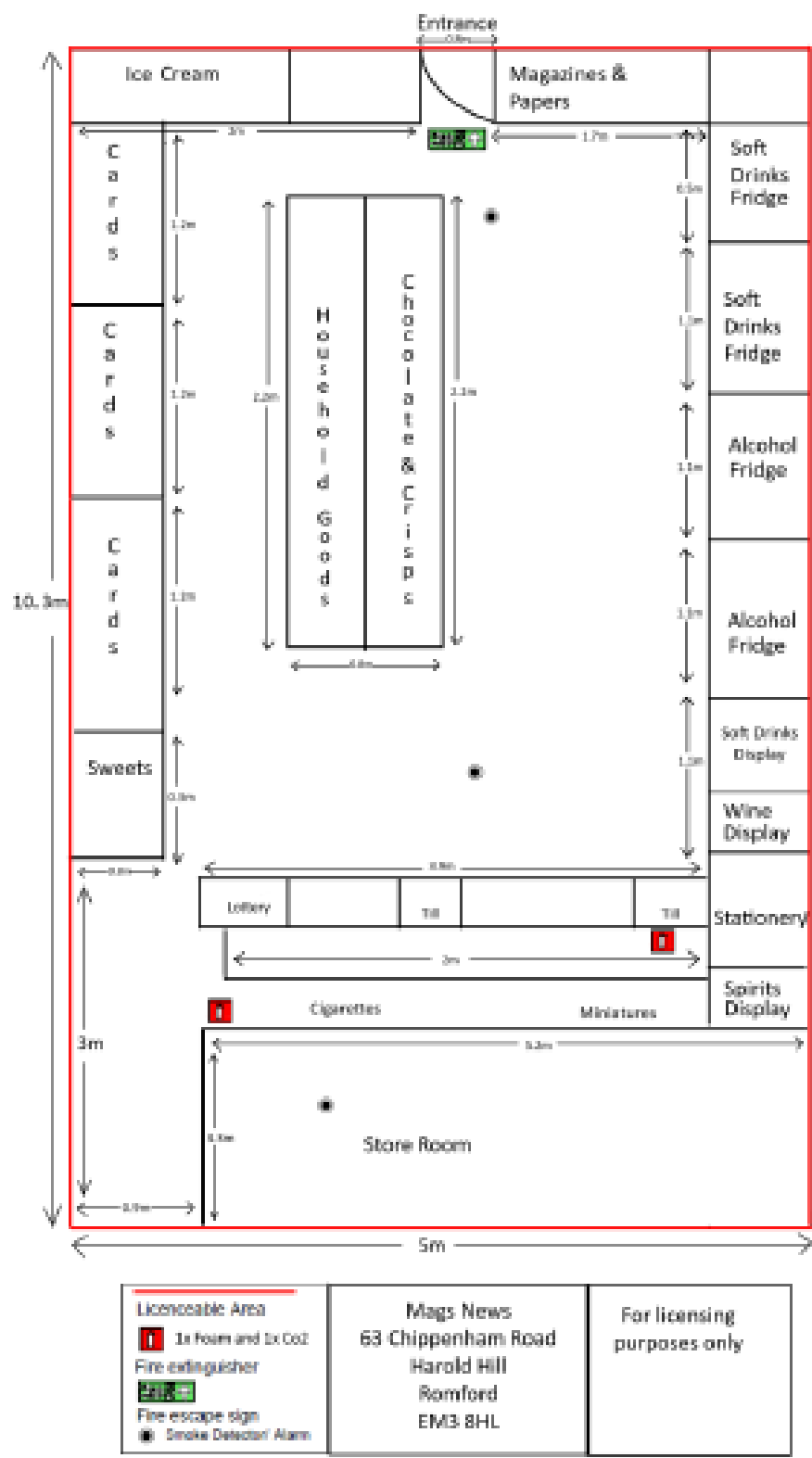
**Annex 3 – conditions attached after a hearing by the Licensing Authority**

**Not applicable**

**5 of 6**

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Annex 4 – premises plan





## Part B

### Premises licence summary

Premises licence number

28185

### Premises details

Postal address of premises

Mags Newsagents  
63 Chippenham Road Romford RM3 8HL

Where the licence is time limited the dates

Not applicable

Licensable activities authorised by the licence

Supply of alcohol

The times the licence authorises the carrying out of licensable activities

Monday to Saturday – 08:00 to 19:00  
Sunday – 08:00 to 15:00

The opening hours of the premises

Monday to Saturday – 06:00 to 19:00  
Sunday – 06:30 to 15:00

Where the licence authorises supplies of alcohol whether these are on and / or off supplies

Off supplies only

Name, (registered) address of holder of premises licence

Mr Pankajkumar Raojibhai Patel

Registered number of holder

Not applicable

1 of 2

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Name of designated premises supervisor where the premises licence authorises for the supply of alcohol

**Mr Pankajkumar Raojibhai Patel**

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State whether access to the premises by children is restricted or prohibited

**Not restricted**

**2 of 2**

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COPY



**Havering**  
L O N D O N   B O R O U G H

Copy of Application

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\* required information

## Section 1 of 18

You can save the form at any time and resume it later. You do not need to be logged in when you resume.

System reference

Not Currently In Use

This is the unique reference for this application generated by the system.

Your reference

You can put what you want here to help you track applications if you make lots of them. It is passed to the authority.

Are you an agent acting on behalf of the applicant?

☒ Yes ☐ No

Put "no" if you are applying on your own behalf or on behalf of a business you own or work for.

### Applicant Details

\* First name

Pankajkumar Raojibhai

\* Family name

Patel

\* E-mail

patel62pankaj@gmail.com

Main telephone number

Include country code.

Other telephone number

☐ Indicate here if the applicant would prefer not to be contacted by telephone

Is the applicant:

- ☐ Applying as a business or organisation, including as a sole trader
- ☒ Applying as an individual

A sole trader is a business owned by one person without any special legal structure. Applying as an individual means the applicant is applying so the applicant can be employed, or for some other personal reason, such as following a hobby.

*Continued from previous page...*

### Address

* Building number or name	<input type="text" value="69"/>
* Street	<input type="text" value="Chippenham Road, Harold Hill"/>
District	<input type="text"/>
* City or town	<input type="text" value="Romford"/>
County or administrative area	<input type="text"/>
* Postcode	<input type="text" value="RM3 8HL"/>
* Country	<input type="text" value="United Kingdom"/>

### Agent Details

* First name	<input type="text" value="Arlene"/>
* Family name	<input type="text" value="auf der Mauer"/>
* E-mail	<input type="text" value="admtraining58@gmail.com"/>
Main telephone number	<input type="text" value="07950685397"/>
Other telephone number	<input type="text"/>

Include country code.

☐ Indicate here if you would prefer not to be contacted by telephone

Are you:

- ☐ An agent that is a business or organisation, including a sole trader
- ☒ A private individual acting as an agent

A sole trader is a business owned by one person without any special legal structure.

### Your Address

Address official correspondence should be sent to.

* Building number or name	<input type="text" value="8"/>
* Street	<input type="text" value="Oxford Road"/>
District	<input type="text"/>
* City or town	<input type="text" value="Harrow"/>
County or administrative area	<input type="text"/>
* Postcode	<input type="text" value="Ha1 4JF"/>
* Country	<input type="text" value="United Kingdom"/>

## Section 2 of 18

### APPLICATION DETAILS

*Continued from previous page...*

**This application cannot be used to vary the licence so as to extend the period for which the licence has effect or to vary substantially the premises to which it relates. If you wish to make that type of change to the premises licence, you should make a new premises licence application under section 17 of the Licensing Act 2003.**

I/we, as named in section 1, being the premises licence holder, apply to vary a premises licence under section 34 of the Licensing Act 2003 for the premises described in section 2 below.

\* Premises Licence Number

Are you able to provide a postal address, OS map reference or description of the premises?

☒ Address    ☐ OS map reference    ☐ Description

### Postal Address Of Premises

Building number or name

Street

District

City or town

County or administrative area

Postcode

Country

### Premises Contact Details

Telephone number

Non-domestic rateable value of premises (£)

## Section 3 of 18

### VARIATION

Do you want the proposed variation to have effect as soon as possible? ☒ Yes    ☐ No

Do you want the proposed variation to have effect in relation to the introduction of the late night levy?

☐ Yes    ☒ No

You do not have to pay a fee if the only purpose of the variation for which you are applying is to avoid becoming liable to the late night levy.

If your proposed variation would mean that 5,000 or more people are expected to attend the premises at any one time, state the number expected to attend

**Describe Briefly The Nature Of The Proposed Variation** **Page 27**

**Continued from previous page...**

Describe the premises. For example the type of premises, its general situation and layout and any other information which could be relevant to the licensing objectives. Where your application includes off-supplies of alcohol and you intend to provide a place for consumption of these off-supplies, you must include a description of where the place will be and its proximity to the premises.

Mr. Patel seeks an extension of opening hours to 06:00 -21:00 and sale of alcohol hours to 08:00 - 21:00, and an increase to the permitted strength of cider for sale from 6% to 8% as to be competitive with neighbouring premises. Given that the area is located in a CIZ Mr.Patel would also like to amend existing conditions to include labelling of cans and bottles to enable tracing of any street drinking, littering or other anti-social behaviour that may be tied to alcohol purchased from the premises.

**Section 4 of 18**

**PROVISION OF PLAYS**

[See guidance on regulated entertainment](#)

Will the schedule to provide plays be subject to change if this application to vary is successful?

☐ Yes ☒ No

**Section 5 of 18**

**PROVISION OF FILMS**

[See guidance on regulated entertainment](#)

Will the schedule to provide films be subject to change if this application to vary is successful?

☐ Yes ☒ No

**Section 6 of 18**

**PROVISION OF INDOOR SPORTING EVENTS**

[See guidance on regulated entertainment](#)

Will the schedule to provide indoor sporting events be subject to change if this application to vary is successful?

☐ Yes ☒ No

**Section 7 of 18**

**PROVISION OF BOXING OR WRESTLING ENTERTAINMENTS**

[See guidance on regulated entertainment](#)

Will the schedule to provide boxing or wrestling entertainments be subject to change if this application to vary is successful?

☐ Yes ☒ No

**Section 8 of 18**

**PROVISION OF LIVE MUSIC**

[See guidance on regulated entertainment](#)

Will the schedule to provide live music be subject to change if this application to vary is successful?

☐ Yes ☒ No

**Section 9 of 18**

Continued from previous page...

PROVISION OF RECORDED MUSIC

[See guidance on regulated entertainment](#)

Will the schedule to provide recorded music be subject to change if this application to vary is successful?

☐ Yes
☒ No

Section 10 of 18

PROVISION OF PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will the schedule to provide performances of dance be subject to change if this application to vary is successful?

☐ Yes
☒ No

Section 11 of 18

PROVISION OF ANYTHING OF A SIMILAR DESCRIPTION TO LIVE MUSIC, RECORDED MUSIC OR PERFORMANCES OF DANCE

[See guidance on regulated entertainment](#)

Will the schedule to provide anything similar to live music, recorded music or performances of dance be subject to change if this application to vary is successful?

☐ Yes
☒ No

Section 12 of 18

PROVISION OF LATE NIGHT REFRESHMENT

Will the schedule to provide late night refreshment be subject to change if this application to vary is successful?

☐ Yes
☒ No

Section 13 of 18

SUPPLY OF ALCOHOL

Will the schedule to supply alcohol be subject to change if this application to vary is successful?

☒ Yes
☐ No

Standard Days And Timings

MONDAY

Start

08:00

End

21:00

Start

End

TUESDAY

Start

08:00

End

21:00

Start

End

Provide timings in 24 hour clock (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

**Continued from previous page...**

**WEDNESDAY**

Start  End

Start  End

**THURSDAY**

Start  End

Start  End

**FRIDAY**

Start  End

Start  End

**SATURDAY**

Start  End

Start  End

**SUNDAY**

Start  End

Start  End

Will the sale of alcohol be for consumption?

☐ On the premises ☒ Off the premises ☐ Both

If the sale of alcohol is for consumption on the premises select on, if the sale of alcohol is for consumption away from the premises select off. If the sale of alcohol is for consumption on the premises and away from the premises select both.

State any seasonal variations.

For example (but not exclusively) where the activity will occur on additional days during the summer months.

Non-standard timings. Where the premises will be used for the supply of alcohol at different times from those listed above, list below.

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

**Continued from previous page...**

Highlight any adult entertainment or services, activities, or other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children.

Provide information about anything intended to occur at the premises or ancillary to the use of the premises which may give rise to concern in respect of children, regardless of whether you intend children to have access to the premises, for example (but not exclusively) nudity or semi-nudity, films for restricted age groups etc gambling machines etc.

None

**Section 15 of 18**

**HOURS PREMISES ARE OPEN TO THE PUBLIC**

**Standard Days And Timings**

MONDAY

Start

End

Start

End

Provide timings in 24 hour clock (e.g., 16:00) and only give details for the days of the week when you intend the premises to be used for the activity.

TUESDAY

Start

End

Start

End

WEDNESDAY

Start

End

Start

End

THURSDAY

Start

End

Start

End

FRIDAY

Start

End

Start

End

SATURDAY

Start

End

Start

End

SUNDAY

Start

End

Start

End

State any seasonal variations.

For example (but not exclusively) where the activity will occur on additional days during the summer months.

**Continued from previous page...**

Non standard timings. Where you intend to use the premises to be open to the members and guests at different times from those listed above, list below.

For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.

Identify those conditions currently imposed on the licence which you believe could be removed as a consequence of the proposed variation you are seeking.

☒ I have enclosed the premises licence

☐ I have enclosed the relevant part of the premises licence

Reasons why I have failed to enclose the premises licence or relevant part of premises licence.

## Section 16 of 18

### LICENSING OBJECTIVES

Describe the steps you intend to take to promote the four licensing objectives:

a) General – all four licensing objectives (b,c,d,e)

List here steps you will take to promote all four licensing objectives together.

Amended to: Selling and the supply of alcohol will only be permitted between the following hours mon - sun 08:00 - 21:00

b) The prevention of crime and disorder

Amended to: No high strength beers, lagers, and ciders above 8% ABV shall be stocked or sold at the premises.

c) Public safety



***Continued from previous page...***

d) The prevention of public nuisance

Additional condition: Cans and bottles will be labelled with the address and name of the premises so as to enable tracing of any street drinking, littering or other anti-social behaviour that may be tied to alcohol purchased from the premises.

e) The protection of children from harm

**Section 17 of 18**

**NOTES ON REGULATED ENTERTAINMENT**

***Continued from previous page...***

In terms of specific **regulated entertainments** please note that:

- Plays: no licence is required for performances between 08:00 and 23.00 on any day, provided that the audience does not exceed 500.
- Films: no licence is required for 'not-for-profit' film exhibition held in community premises between 08.00 and 23.00 on any day provided that the audience does not exceed 500 and the organiser (a) gets consent to the screening from a person who is responsible for the premises; and (b) ensures that each such screening abides by age classification ratings.
- Indoor sporting events: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000.
- Boxing or Wrestling Entertainment: no licence is required for a contest, exhibition or display of Greco-Roman wrestling, or freestyle wrestling between 08.00 and 23.00 on any day, provided that the audience does not exceed 1000. Combined fighting sports – defined as a contest, exhibition or display which combines boxing or wrestling with one or more martial arts – are licensable as a boxing or wrestling entertainment rather than an indoor sporting event.
- Live music: no licence permission is required for:
  - o a performance of unamplified live music between 08.00 and 23.00 on any day, on any premises.
  - o a performance of amplified live music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
  - o a performance of amplified live music between 08.00 and 23.00 on any day, in a workplace that is not licensed to sell alcohol on those premises, provided that the audience does not exceed 500.
  - o a performance of amplified live music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
  - o a performance of amplified live music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school or (iii) the health care provider for the hospital.
- Recorded Music: no licence permission is required for:
  - o any playing of recorded music between 08.00 and 23.00 on any day on premises authorised to sell alcohol for consumption on those premises, provided that the audience does not exceed 500.
  - o any playing of recorded music between 08.00 and 23.00 on any day, in a church hall, village hall, community hall, or other similar community premises, that is not licensed by a premises licence to sell alcohol, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance from a person who is responsible for the premises.
  - o any playing of recorded music between 08.00 and 23.00 on any day, at the non-residential premises of (i) a local authority, or (ii) a school, or (iii) a hospital, provided that (a) the audience does not exceed 500, and (b) the organiser gets consent for the performance on the relevant premises from: (i) the local authority concerned, or (ii) the school proprietor or (iii) the health care provider for the hospital.

**Continued from previous page...**

- Dance: no licence is required for performances between 08.00 and 23.00 on any day, provided that the audience does not exceed 500. However, a performance which amounts to adult entertainment remains licensable.
- Cross activity exemptions: no licence is required between 08.00 and 23.00 on any day, with no limit on audience size for:
  - o any entertainment taking place on the premises of the local authority where the entertainment is provided by or on behalf of the local authority;
  - o any entertainment taking place on the hospital premises of the health care provider where the entertainment is provided by or on behalf of the health care provider;
  - o any entertainment taking place on the premises of the school where the entertainment is provided by or on behalf of the school proprietor; and
  - o any entertainment (excluding films and a boxing or wrestling entertainment) taking place at a travelling circus, provided that (a) it takes place within a moveable structure that accommodates the audience, and (b) that the travelling circus has not been located on the same site for more than 28 consecutive days.

**Section 18 of 18**

**PAYMENT DETAILS**

This fee must be paid to the authority. If you complete the application online, you must pay it by debit or credit card.

Variation Fees are determined by the non domestic rateable value of the premises.

To find out a premises non domestic rateable value go to the Valuation Office Agency site at [http://www.voa.gov.uk/business\\_rates/index.htm](http://www.voa.gov.uk/business_rates/index.htm)

Band A - No RV to £4300 - £100.00

Band B - £4301 to £33000 - £190.00

Band C - £33001 to £87000 - £315.00

Band D - £87001 to £125000 - £450.00\*

Band E - £125001 and over - £635.00\*

\*If the premises rateable value is in Bands D or E and the premises is primarily used for the consumption of alcohol on the premises then your are required to pay a higher fee

Band D - £87001 to £125000 - £900.00

Band E - £125001 and over - £1,905.00

If you own a large premise you are subject to additional fees based upon the number in attendance at any one time

Capacity 5000-9999 - £1,000.00

Capacity 10000-14999 - £2,000.00

Capacity 15000-19999 - £4,000.00

Capacity 20000-29999 - £8,000.00

Capacity 30000-39999 - £16,000.00

Capacity 40000-49999 - £24,000.00

Capacity 50000-59999 - £32,000.00

Capacity 60000-69999 - £40,000.00

Capacity 70000-79999 - £48,000.00

Capacity 80000-89999 - £56,000.00

Capacity 90000 and over - £64,000.00

\* Fee amount (£)

190.00

**ATTACHMENTS**

**AUTHORITY POSTAL ADDRESS**

**Continued from previous page...**

**Address**

Building number or name	<input type="text"/>
Street	<input type="text"/>
District	<input type="text"/>
City or town	<input type="text"/>
County or administrative area	<input type="text"/>
Postcode	<input type="text"/>
Country	<input type="text" value="United Kingdom"/>

**DECLARATION**

\* I/we understand it is an offence, liable on conviction to a fine up to level 5 on the standard scale, under Section 158 of the Licensing Act 2003, to make a false statement in or in connection with this application.

☐ Ticking this box indicates you have read and understood the above declaration

This section should be completed by the applicant, unless you answered "Yes" to the question "Are you an agent acting on behalf of the applicant?"

* Full name	<input type="text"/>
* Capacity	<input type="text"/>
Date (dd/mm/yyyy)	<input type="text"/>

Once you're finished you need to do the following:

1. Save this form to your computer by clicking file/save as...
2. Go back to <https://www.gov.uk/apply-for-a-licence/premises-licence/havering/change-1> to upload this file and continue with your application.

Don't forget to make sure you have all your supporting documentation to hand.

**IT IS AN OFFENCE, UNDER SECTION 158 OF THE LICENSING ACT 2003, TO MAKE A FALSE STATEMENT IN OR IN CONNECTION WITH THIS APPLICATION. THOSE WHO MAKE A FALSE STATEMENT MAY BE LIABLE ON SUMMARY CONVICTION TO A FINE OF ANY AMOUNT.**



## Representations from Responsible Authorities

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### **Licensing Act 2003 Responsible Authority representation**

**This representation is made by a responsible Authority for the London Borough of Havering concerning an application for a temporary event notice for the premises as detailed below.**

**Premises Name and address:** Mags News, 63 Chippenham Rd, Harold Hill, Romford, RM3 8HL

**Your Name:** Oisin Daly

**Organisation name/name of body you represent:** London Borough of Havering/Licensing

**Your Address:** C/O, Town Hall, Main Road, Romford, Essex, RM1 3BD

**Email:** Oisin.daly@haverling.gov.uk

**Contact telephone number:** 01708 432555

**Summary of Objection:** Objection to an application for a variation to a premises licence as if granted likely to undermine the licensing objectives of the prevention of crime and disorder and public nuisance.

#### **Policy Considerations:**

##### **10. Special Cumulative Impact Policy for Gooshays**

10.1 Unlike Hornchurch and Romford, Gooshays is not a major night time economy. A cumulative impact policy was adopted for this area under the previous Statement of Licensing Policy adopted on 7th January 2016

10.2 In the Havering Community Safety Partnership report, London Borough of Havering Non Domestic Abuse Violence with Injury Problem Profile, May 2018 Gooshays was identified as the ward with second highest amounts of VWI reports to the police in 2017.

10.3 As this area does not house a night time economy environment it is important to understand why this area ranks high in the number of incidents. It also shows as a hotspot in London Ambulance assault data. A hypothesis is that this area is one of Havering's areas which has the lowest deprivation index and thus this has an impact of the level of violent crime experienced in this area.

10.4 One hotspot was identified within the Gooshays ward where incidents appeared linked to licensed premises. This was the Farnham Road/ Hildene Avenue where a number of assaults were reported within licensed retail establishments.

10.5 On the basis of the above evidence the Licensing Authority is of the view that the number, type and density of premises selling alcohol for consumption off the premises around the Farnham Road/Hildene Avenue area is having a cumulative impact and undermining the licensing objectives and a cumulative impact policy has been adopted in this area. It is likely that granting further licences would be inconsistent with the authority's

duty to promote the licensing objectives and a cumulative impact policy has been adopted in this area.

10.6 None of the premise identified in the report relate to on sales or late night refreshment and therefore the cumulative impact policy for the Gooshays area is restricted to off sale premises only.

Figure 4 Gooshays Cumulative Impact Zone



## 12. Licensing Hours

12.1 When dealing with new and variation applications the Licensing Authority may give more favourable consideration to applications with the following closing times:

Public Houses and Bars 23:00 hours Sunday to Thursday Midnight Friday and Saturday

Nightclubs 01:00 hours Sunday to Thursday 02:00 hours Friday and Saturday

Restaurants and Cafes 23:00 hours Sunday to Thursday Midnight- Friday and Saturday

**Off licences 23:00 Monday to Sundays**

Hot food and drink supplied by takeaways, fast food premises Midnight- Sunday to Thursdays 01:00 Friday and Saturday



Hotel residents only 24 hours sale of alcohol for on sales only

12.2 Consideration will also be given to the type of area that the premises is located in with regulated activities normally being permitted until 23.30 in residential areas and 00.30 in mixed use areas.

12.3 The above hours are a guide and each application will be considered on it's own merits.

## Representation

This representation against the application is primarily based on the fact that the premises is situated within a mixed use area within the CIZ for Harold Hill and the crime and disorder and public nuisance licensing objectives are likely to be undermined.

The zone was designated in recognition of the issues faced in the demographics and how alcohol is a contributor to street drinking within the area.

Harold Hill is the most deprived area of the borough and unfortunately also one of the most deprived across London. ([PUBLIC Cabinet Report Farnham Hildene Chippenham Rd and Abercrombie Hostel March 2021 Cabinet Report.pdf](#))

With deprivation comes reduced quality of life, education and tendencies towards substance misuse, including alcohol.

I sit on a multi-agency combatting drugs panel of health professionals from across the borough. Harold Hill is a regular discussion point and there are several schemes ongoing with an intention to improve outcomes for residents and reduce dependency on substances including alcohol.

I have also been present on several multi-agency days of action in Harold Hill, concentrating on the parade of shops in the area. There has been, and continues to be, an issue with street drinking in the area.

The local authority has no objection to increase in hours as requested in the variation.

The point of contention within this application relates to the strength of beers lagers and ciders increasing to 8% ABV rather than the current 6%.

There have been numerous studies, which indicate that selling higher strength beers, lagers and ciders impact on the licensing objectives. I have attached the Local Government Associations guidance on "Reducing the strength" schemes and how lowering the ABV in an area can assist in reducing the risk of the licensing objectives being undermined.

High strength alcohol is a draw to those dependent on alcohol. With the dependency comes a desire to consume alcohol that is higher in strength to further intoxication. This manifests itself in street drinking. Congregations of dependent individuals are likely in public spaces, especially near premises who are selling high strength beers. Those congregations will likely be more intoxicated and contribute to nuisance and ASB in the area.

It is worth noting that the premises licence has only been in force since May 2025, the offending condition above was offered by the applicant at the time of the application.

This is the second variation application in that time with the first rejected due to a failure to advertise correctly.

Following that rejection I emailed the agent for the applicant and informed them although they could apply again, the Licensing Authority would likely have concerns:

*"Good Morning,*

*I'm afraid I have already informed authorities that the application was rejected so you'll need to reapply.*

*However, it is likely that even with a new application there could be representations.*

*The area is a CIZ with a specific issue of street drinking. The licence has only been in place for a matter of months and the applicants seeks to provide high strength alcohol in order to be competitive in the market place without due regard to the issues faced in the area.*

*I have cc'd in the Met Police as well. You may wish to advise your client accordingly."*

The applicant has offered a condition relating to individual labelling of products as mitigation for the increase in the ABV. I am of the view that this does not address the issue and is impractical to apply for licence holders.

Placing stickers on all cans and bottles is an onerous task which has limited effect, condensation from cold products once taken out of a fridge into a warmer environment will occur and stickers can become loose.

Labelling of all alcoholic products seeks to identify offenders after an offence has occurred. The Licensing Act is about prevention and the condition offered does not follow that principle.

If the applicant wishes to add that as a condition then the authority would not object, however, the view of the licensing authority is that it will not mitigate the impact of the proposed increase in ABV.

## **Conclusion**

The licensing authority is making representation that if the application is granted in it's current format then there is a likelihood that the licensing objectives will be undermined.

The applicant has not sufficiently demonstrated through their operating schedule that the premises acknowledge the cumulative impact within the area nor offered any conditions that could be appropriate to uphold the licensing objectives.

The authority respectfully request that the committee consider the partial refusal of this application, specifically the condition requesting the increase in the ABV of beers, lagers

and ciders..

**Complaint and Inspection History (if applicable)**

**N/A**

**Other documents attached**

N/a

Signed

*Oisin Daly*

Dated: 22<sup>nd</sup> August 2025



Licensing Authority  
London Borough of Havering

PC Ellis Grote  
East Area Licensing Team  
Romford Police Station  
19 Main Road  
Romford  
Essex  
RM1 3BJ

Telephone: 01708 779162

Email: [REDACTED]

[www.met.police.uk](http://www.met.police.uk)

Your ref: Premises License  
Variation, Mags News

Date: 26/08/2025

Dear Sir/Madam,

**Subject: Objection to part of Premises License variation – Mags News, 63 Chippenham Rd, Harold Hill, Romford, RM3 8HL**

In relation to the application received, Metropolitan Police would like to object part of the application. The licensing objectives that Police are objecting under are as follows: Prevention of Crime and Disorder, Public Safety and the Prevention of Public Nuisance. The part we wish to object to is to Increase the permitted strength of cider for sale from 6% to 8%.

Chippenham Road houses the busiest shopping area in the Harold Hill and Harold Wood towns and sits within the Gooshays Cumulative Impact Zone, there are a number of food stores, convenience stores, health stores and various other stores. Mainly during the summer this area has a lot of issues with street drinkers and homeless in the area drinking alcohol and generally causing anti social behaviour, mainly using the seated areas around Hilddene Avenue and Farnham Road. Having been a response team officer for a number of years in the London Borough of Havering, I have responded to a number of occasions where street drinkers, due to their levels of intoxication have caused ASB, committed public order offences, violent crimes, shoplifted and in many occasions, had to be attended to by the London Ambulance Service due to being drunk and incapable. Having stronger alcohol at affordable prices will have a negative effect on the local community, as street drinkers are often alcohol or drug

dependant and use stronger and cheaper alcohol as an affordable way to drink and become intoxicated, stronger alcohol makes it easier for them to drink themselves to the point where they are sometimes completely unresponsive and put themselves at great risk.

Whilst Police welcome additional measures the labelling of cans and bottles to enable tracing this appears labour intensive and isn't a preventative measure unless those with the containers are stopped by Police or Council officers.

I have also spoken to the local DWO for Heaton Ward, who shares the same opinion as myself in that having higher strength alcohol more available and affordable will have a negative impact on the local business and community.

Police ask the sub committee to reject the aforementioned section of this application.

Yours Sincerely,

E GROTE

PC Ellis GROTE  
Licensing Officer

# Reducing the strength

Guidance for councils considering setting up a scheme







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# Introduction

Councils have multiple roles in relation to the sale, consumption and impact of alcohol in their local areas. As licensing authorities, they are responsible for authorising the sale of alcohol by licensed premises in accordance with the four licensing objectives, a role that extends to working in partnership with businesses, the police and others to ensure that alcohol is enjoyed safely and responsibly. Since 2013, when responsibility for public health returned to councils, they have also assumed responsibility for reducing the harmful health impacts of alcohol misuse on individuals and communities. The challenge for councils is to find the right balance between these different objectives.

There is scope for developing innovative approaches in this area, and many examples of projects seeking to address these objectives. One such project is an approach to tackling the harmful effects of strong and low cost alcohol products through 'Reducing the Strength' campaigns.

Reducing the Strength refers to initiatives designed to tackle the problems associated with street drinking by removing from sale low price high-strength alcohol products through voluntary agreements with local retailers. Suffolk was the first area to adopt the approach back in 2012 and since then a number of other places have followed. The models used vary from place-to-place, but tend to target alcohol products above 6.5 per cent alcohol by volume (abv), although some have focused on a slightly lower abv or lower cost products.

The early success of the scheme in Suffolk generated significant interest in Reducing the Strength schemes, with former Crime Prevention Minister Norman Baker MP praising councils' 'initiative and determination to find ways to tackle the harms associated with high volume super-strength alcohol.' However, there have also been a number of concerns raised about them, particularly by retailer and producer associations.

The primary concerns raised have been whether such schemes breach competition law and/or whether councils have breached the Licensing Act by seeking to put in place blanket licensing conditions. Concerns have also been raised about whether more recent schemes have adopted the evidence based, holistic approach of the original Suffolk scheme, which aimed to tackle a particular problem in a specific area through a joined up approach with other agencies. Finally, there are concerns about unintended consequences, such as the removal of products that were not a target for such schemes.

The aim of this guidance is to help ensure that Reducing the Strength schemes are designed and established in a way that addresses these concerns and complies with relevant legislation. We have worked closely with industry associations, as well as the Competition and Markets Authority, to understand the risks associated with these schemes and identify how they can be best addressed, so that anyone implementing a Reducing the Strength scheme can do so on a fully informed basis and taking account of best practice drawn from elsewhere, in particular Suffolk and Portsmouth, who have shared case studies for this document.

In producing this guidance, we are not seeking to encourage councils to adopt Reducing the Strength schemes; individual councils and their partners will reach their own decisions based on local circumstances, and the decisions reached will vary from place to place. However, in light of ongoing concern about these schemes among some sections of the industry, and the risk that a producer trade body may yet seek to challenge these schemes in court, we urge any council that is considering embarking on a Reducing the Strength scheme to familiarise themselves with the issues outlined in this document and seek their own legal advice before implementing a Reduce the Strength scheme.

# Alcohol consumption and street drinking

Councils face a challenge in terms of their public health role and alcohol. On the one hand, the vast majority of people who enjoy alcohol do so responsibly and without causing immediate harm to either themselves or others. Furthermore, alcohol and the wider hospitality industry make an extremely significant contribution to the national and local economies through bars, pubs, clubs and restaurants.

Yet there is also a clear body of evidence demonstrating that drinking habits are harming the nation's health as well contributing to problems on the streets of towns and cities. The Health and Social Care Information Centre estimates that about 1.6 million adults in England are dependent on alcohol, and alcohol misuse can lead to a wide range of conditions, including cancer, heart disease, strokes and, of course, liver disease. It is also believed to be a factor in about half of all violent crime and domestic abuse and is estimated to cost the country £11 billion a year in terms of criminal justice (or £21 billion when health and loss of productivity is taken into account).

To balance these two realities, the most effective approach for councils to take in managing alcohol will be to use their health and licensing roles to target specific issues and problems arising from the consumption of alcohol, rather than taking a universal approach that affects those who are drinking responsibly. Reducing the strength schemes are a good example of this targeted approach and are one of a range of tools used to tackle alcohol related harm.

## Defining street drinking

A street drinker is defined as a person who drinks heavily in public places and, at least in the short term, is unable or unwilling to control or stop their drinking, has a history of alcohol misuse and often drinks in groups for companionship (Lamb, 1995). People who are street drinkers are likely to be at increased risk of causing harm to themselves or others and may be involved in antisocial behaviour such as begging, or rowdy drunken behaviour that can be intimidating or even violent. Street drinkers are often, although not exclusively, associated with homelessness; homeless charity Thames Reach has stated that strong and cheap alcohol is responsible for more deaths among the homeless than heroin or crack cocaine combined.<sup>1</sup>

Street drinking can have an extremely damaging impact on local communities and peoples' perception of them, including on businesses in close proximity to places where street drinkers congregate.

Street drinkers often consume high strength alcohol. The definition of high strength varies, but for the purposes of Reducing the Strength schemes has tended to refer to products from around 6.5 per cent abv upwards. There is a wide range of beers available around the 8 to 9 per cent abv mark – as well as a number of high-strength white ciders – and a single 500ml can of high strength lager can contain over four units of alcohol, more than the daily lower risk drinking guidelines for both men and women. A recent ruling by the Portman Group Independent Complaints

<sup>1</sup> [www.thamesreach.org.uk/news-and-views/campaigns/super-strength-drinks](http://www.thamesreach.org.uk/news-and-views/campaigns/super-strength-drinks)

Panel<sup>2</sup> found that 500ml cans of 9 per cent abv Tennents Super 'encouraged immoderate consumption', as a single can contained more than the government guidelines and contents are encouraged to be consumed by one person in one setting. The product was therefore found to breach Rule 3.2 (f) of the Portman Group Code, which states that 'a drink, its packaging or promotion should not encourage illegal, irresponsible or immoderate consumption, such as binge drinking, drunkenness or drink-driving.' Consequently, licensees have been asked not to place orders for stocks of the product after 31 December 2014

The Portman Group issues alerts with their latest decisions, and councils may wish to sign-up for these alerts and encourage local retailers to do the same.

Clearly, not all high-strength products are consumed in the same way. A number of high-strength products are targeted at the luxury end of the market and are rarely associated with street drinking and/or alcohol-related violence. Any scheme will need to make provision to exclude premium and craft products that are not associated with street drinking or other anti-social behaviour being targeted by schemes.

However, low price high-strength products are most commonly associated with street drinkers and rough sleepers, and are therefore linked to some of the specific issues experienced by these groups and the communities where they are based.

## Tackling street drinking

Initiatives to deal with street drinking have included controlling mechanisms such as by-laws, public space protection orders, or anti-social behaviour orders. The government's public health responsibility deal – its voluntary partnership with industry – is also having an influence. In July 2014, it was announced that from December 2014 those

signing up to the agreement would not sell alcohol products with more than four units per 440ml can. Tesco and Morrisons were among the early retailers to sign up, although it is unclear what level of support there is in the wholesale retail market, which supplies the vast majority of off licence premises.

### **A partnership approach: the Responsibility Deal**

The Responsibility Deal aims to tap into the potential for businesses and other influential organisations to make a significant contribution to improving public health by developing a more collaborative approach to tackling the challenges caused by our lifestyle choices.

Since its launch in March 2011, the Public Health Responsibility Deal has harnessed the potential for businesses to play their part in shaping an environment which supports people to make healthier choices. To date, over 600 companies have made commitments covering alcohol, food, health at work and physical activity.

However, it is local initiatives that can really tackle problems associated with street drinking, through a series of targeted measures involving a range of different services or interventions. Since many street drinkers will be alcohol dependent or have entrenched problems with alcohol misuse, effective solutions will include the offer of support services to tackle alcohol dependency.

For example, Suffolk's approach to street drinking involved the provision of treatment, education and alternative accommodation in addition to removing selected products from the shelves. It is this comprehensive package that has achieved the significant reductions in street-drinking and alcohol-related violence in the town; one measure in isolation would not have been as effective.

<sup>2</sup> [www.portmangroup.org.uk/docs/default-source/complaint-decisions/rab-flyer\\_tennentssuper-vfinalA7E479E8F3F8.pdf?sfvrsn=2](http://www.portmangroup.org.uk/docs/default-source/complaint-decisions/rab-flyer_tennentssuper-vfinalA7E479E8F3F8.pdf?sfvrsn=2)

# Setting up a ‘Reducing the Strength’ project

## Core principles of good schemes

There are many shared characteristics of successful Reducing the Strength schemes, but they can be summarised under three broad headings.

### **Using the evidence base to agree clear, targeted objectives**

The most effective schemes will be underpinned by a clear, localised evidence base that provides the rationale for both the scheme and its specific objectives, in terms of targeting particular issues, products or areas. Starting with a solid evidence base will also enable councils and their partners to monitor the impact of the scheme and evaluate its success.

### **Engaging and communicating**

Good schemes will be characterised by early and ongoing communication with partners such as the police, public health teams and local support services / third sector organisations (eg, those working with the homeless, or people with substance addictions), as well as with local businesses, who are pivotal to a scheme’s success. Treating businesses as partners, managing the competition law risk to them and understanding businesses’ concerns and constraints are all important elements of a scheme.

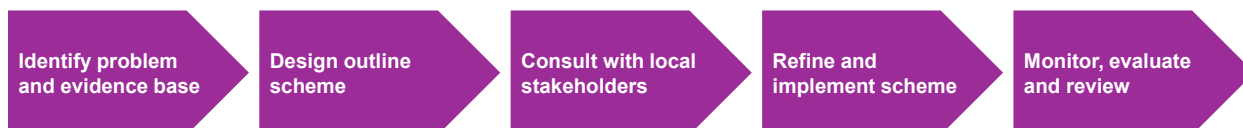
### **Taking a holistic approach**

The original Suffolk scheme was a success in part because it applied a comprehensive approach to tackling street drinking, rather than using a single isolated measure. Schemes are more likely to be successful

if they apply a range of different tools in a collaborative, comprehensive approach to the problem of street drinking, based on engaging with and involving the partners identified above.

# Designing and launching a scheme – step by step guide

There are five key steps to launching a Reducing the Strength scheme:



## Identify problem and evidence base

- **Determine whether there is a problem that needs addressing, what it is and what the evidence shows.** The areas that have shown most interest in Reducing the Strength are ones where street drinking and anti-social behaviour are serious problems in specific places. If this is an issue in your area, the council and partners are already likely to know where the problems are, but a review of crime statistics and homeless reports as well as A&E figures will help to evidence this. You may want to use the metrics available on LG Inform<sup>3</sup> to profile your area and compare with other areas with similar demographics.
- **Talk to businesses, the public and local partners (including the police, health teams and charities) to see if they identify the same problems, and what solutions they might suggest.** What are the issues of concern to local residents and businesses? Are there other issues that could be tackled at the same time as the issue you want to address? What support might others be able to provide? If there is a local Business Improvement District, can it provide support in any way?
- **Consider alternative approaches that may be cheaper, easier, and more practical for retailers and other stakeholders.** For example, if a small number of street drinkers have been identified, would it be possible to work with retailers to ensure that those individuals are not served?
  - For instance, a recent survey by the Association of Convenience Stores (ACS) found that retailers often felt intimidated, or risked physical assault, if they refused to sell to a person who was drunk. Provision of community safety and policing support may help them to refuse sales, immediately improving the situation on the streets; Usdaw's 'Freedom from fear' campaign also has some useful information on this.<sup>4</sup> Your local pubwatch, Purple Flag Board, Community Alcohol Partnership or Chamber of Commerce may be a good starting point for addressing these issues.
  - Similarly, there are many other schemes that can be effective at tackling issues such as underage sales, violence in licensed premises, or reducing conflict at closing time. These schemes are outside the scope of this guide, but more information can be found on the British Beer and Pub Association website [www.beerandpub.com/industry-briefings/local-alcohol-partnerships](http://www.beerandpub.com/industry-briefings/local-alcohol-partnerships).

3 [www.local.gov.uk/about-lginform](http://www.local.gov.uk/about-lginform)

4 [www.usdaw.org.uk/campaigns/freedom-from-fear](http://www.usdaw.org.uk/campaigns/freedom-from-fear)



- A sound evidence base is essential for most licensing decisions or partnership work, and you may be able to use the evidence to introduce a cumulative impact policy, late-night levy, or even build the case for a health objective in the Licensing Act 2003.
- **Weigh up your options for addressing the issues and decide whether Reducing the Strength is the best solution.**

### Design outline scheme

- If you decide there is a role for Reducing the Strength in your area, you should use the available evidence, supported by early discussions with local partners and businesses, to **design an outline approach** covering the:
  - **street drinkers and problem drinkers you are seeking to influence**
  - **products** being consumed by street drinkers
  - **places where these products are available** – including retail outlets but also the black market and informal supply that could be missed by focusing only on shops
  - **geographic area you wish to apply this to**
  - **proposed terms** you would like people to sign up to eg, voluntary removal/ targeted licensing conditions etc
  - different **elements of the scheme that will support the product-focused element** eg, outreach support for street drinkers, detox programmes, alcohol nurses in A&E etc.
- You will need to be clear **about the products that evidence indicates are associated with the local problems you are trying to address.**
  - For example, before establishing their scheme, **Suffolk mapped out which specific products were associated with street drinking or incidents of violence** and was consequently able to narrow down their action to target a very specific, evidence-based set of high strength products. Other high-strength products, mostly those at the luxury end, were therefore exempted from the scheme as they didn't contribute to street drinking or violence.
- Similarly, **Portsmouth identified products found at the scene of violent crimes, domestic abuse and alcohol related disorder**, all of which had an ABV of 6.5 per cent or higher. Their work with the homeless and homeless charity Centrepont also identified that homeless people are more likely to drink alcohol from plastic bottles and cans, due to the risks of glass packaging breaking in areas where they plan to sleep or being used as a weapon.
- **It would be sensible to conduct a similar review of products as part of the design stage of a Reducing the Strength scheme.**
- Equally, the available evidence should be used to help **identify the specific geographical area that the scheme will focus on.** In some places, this may be just a few places within a much wider area; alternatively, there may be a rationale for taking a broader approach. The key issue is that the evidence supports your approach, as this is likely to increase participation in the scheme. You should also consider the risk of displacing the problem, either to different locations or on to different products.
- A third key feature of **the scheme will be the approach you are expecting to take with local retailers;** while some places have opted for a simple voluntary removal of certain products, others have sought to add this as a condition to licences.
  - **Businesses may have different views about whether they wish to participate in the scheme and whether or not they are happy to add a formal condition to their licence.** If you can, it will help to take a flexible approach on this – verbal agreements have worked in many places and formal conditions may not be necessary.



- Based on earlier and ongoing discussions with partners, **you should identify the additional elements of the scheme that will help achieve the overall objective**, whether that is support and/or enforcement by licensing teams and the police; health and third sector support for individuals used to accessing these product; or retailers being given support or training or retailers helping to train one another etc. There may be other things that retailers can do to support these objectives if you discuss this with them and give them the opportunity.
- When you have an outline approach, you should **seek legal advice**. The next section of this guide sets out the main issues you will need to consider under Competition Law and the Licensing Act, but **you will always need to obtain your own legal advice and undertake a risk assessment to ensure the detail of your scheme is legal in relation to both**.
- You may wish to **develop a brand for the scheme, as well as a communications plan to implement once the scheme is formally launched**. In order to avoid breaching competition law, it would be prudent to ensure these are not actually used until the scheme has been launched – more detail is provided on this in the following section.
  - The communications plan **should communicate what you are trying to do**. Use launch events, meet retailers face-to-face, talk to community groups and work with local media. You need to explain your reasoning to your residents, and secure their support for what you are doing. Councillors will be key players in achieving this.
- Schemes should be designed so that the **objectives are clear and measurable** and you should agree at the outset how the scheme, supported by the enforcement of current policies and licensing conditions, can help to meet these objectives. The design process should also include **identifying measures or metrics to evaluate the success of the scheme once it is finalised**.

## Consult with local stakeholders

- It is **advisable to engage with local retailers and businesses throughout the design process, and you may also wish to build in a formal consultation process when you have an outline design of the scheme**. The most successful approach with retailers is likely to be one that sets out the evidence base and rationale for what you are trying to, and treats them as a partner in the scheme that actively encourages feedback. **Equally, it is important to engage with local partners including the police, health services, support agencies and the third sector** to get their involvement and buy in upfront. These partners will be crucial to ensuring that complementary elements of the approach, particularly in terms of support for street-drinkers, can be provided. Additionally, partners can also provide additional resource in terms of engaging with local businesses.

## Refine and implement scheme

- Following consultation with local stakeholders, you may wish to refine the scheme before it is formally launched.
- The first and most important step in implementing the scheme is **working with local businesses to encourage them to participate**. Outlining the potential benefits to businesses from the scheme, rather than just the wider objectives, is likely to be helpful; evidence from earlier schemes suggests that there can be significant benefits to businesses, their staff and families, as well as the wider community.
  - It is important to **recognise that different businesses take decisions in very different ways, and that this will affect how individual stores are able to respond to the proposal**. Some retailers will be able to take a local decision on whether or not they participate; others may need to seek a view from a regional or national head office. In all cases, locally focused evidence of why the scheme is being proposed will increase the likelihood of a decision to participate.

- Similarly, it is also important **to understand the different ways that supplier logistics work**. When taking decisions about what products to stock, some retailers are able to differentiate stock in different places; others cannot. This helps to explain both why it may be difficult or time-consuming for some local retailers to take decisions on certain types of products, and also why some producers are very concerned about this type of scheme.

### **The business rationale for participating in Reducing the Strength schemes**

Licensees who support the positives associated with the campaign recognise the huge benefits that can result from removing low price products from their shelves. For example:

- retailers engaged in schemes have reported dramatic drops in verbal abuse experienced by staff
  - retailers have reported a reduction in assaults on staff
  - retailers report improved community relations as disruptive customers no longer access their shops
  - retailers have reported a reduction in risk of breaching licensing conditions by not selling alcohol to drunken people
  - retailers have reported increased takings as alcohol for sale has higher profit margin
  - retailers have reported happier customers as groups of drunken individuals are no longer in vicinity of shops
  - retailers have reported a reduction in the incidence of shoplifting.
- In some schemes, face to face engagement with retailers has proved to be an effective way of encouraging them to participate in the scheme; in other places, the approach has been to send letters to different tiers of management at local companies. **The**

**approach that you take to encouraging participation may be determined by the resources available and the breadth of the scheme; however, whichever approach you choose, it is sensible to consider how it is likely to be perceived by businesses.**

### **When is a voluntary scheme not voluntary?**

Concerns have been raised by sections of the industry that supposedly voluntary schemes have involved councils or their partners trying to force or even bully businesses to participate in local Reducing the Strength schemes.

Fostering a partnership approach with local retailers in relation to these schemes should help to avoid this, but you should consider how your approach to retailers might be perceived, and potentially who is best placed to make it (council officers, police, etc), in order to avoid accusations of forcing retailers to participate.

Some retailers may believe that the risk of participating in the scheme is too great, or may simply not want to, and they are entitled to reach that decision. This should not necessarily be interpreted as meaning they are not committed to partnership working, and should not mean that they are treated differently by licensing officers or the police, unless there is evidence linking problems to specific premises that have not signed up to the scheme.

- **The formal launch of the scheme needs to be handled carefully, as this is one of the areas where it would be possible to inadvertently breach competition law.**

In broad terms, while there is no problem under competition law with having a visible brand and communications, these should only be used in the sense that they identify participants once the scheme has been formally launched. Naming or identifying individual participants before the scheme

is up and running could be deemed to be encouraging agreements between retailers by influencing the decision of others to participate in the scheme.

#### Monitor, evaluate and review scheme

- Once the scheme has been launched, the onus is on the council and its partners to support it. **Don't be afraid to get tough if problems linked to certain products persist:** there is scope to use the powers police and local authorities have, such as designated public place orders, dispersal or confiscation powers and drinking banning orders. Similarly, if a voluntary ban is not proving to be effective and there are specific problems that can be linked back to specific premises, you could add conditions to licences: Suffolk have done this in relation to a small number of premises. However, **do not apply Reducing the Strength conditions as part of a blanket approach, even if local retailers ask for this to create a level playing field: conditions should always be directly relevant to the individual premises.**
  - **Don't be afraid to alter the scheme to ensure the maximum impact.** However, in doing so, you should keep an open door: **always be prepared to discuss the issues with retailers, community members, councillors, the media and partner agencies.**
- **You should monitor progress against the key objectives and track changes to the evidence base over time.** It will be important for both the lead council, partner agencies and the public to understand the effect the scheme is having; additionally, government has indicated that it is helpful to have evidence about whether these schemes are effective.

## Checklist/summary

- identify problem
- research evidence base and confirm problem / options with partners
- evaluate options
- agree solution.

#### If solution is Reducing the Strength:

- conduct competition law self-assessment
- secure legal advice
- brief councillors
- engage industry, police and charities
- plan branding and launch event
- plan monitoring and evaluation
- launch scheme
- review scheme against milestones and metrics.

# Legal issues

## Legal considerations – competition law and the Licensing Act

### Competition law and Reducing the Strength schemes

It is highly unlikely that a council, in the context of introducing a Reducing the Strength scheme, will be deemed to be acting as an ‘undertaking’ within the meaning of the law (including the Competition Act 1998 and the corresponding articles on the Treaty of the Functioning of the European Union). Competition law only applies to ‘undertakings’, broadly defined as firms or other entities that are engaged in commercial activity. Therefore, the activities of **councils and their staff themselves, in this context, are unlikely to be caught by Competition Law specifically.**

**Local retailers, however, clearly are undertakings within the meaning of competition law. They must, therefore, ensure that they are not engaging in anti-competitive behaviour otherwise they could face significant penalties, including significant fines.** Specifically, this means that they must not engage in restrictive agreements or concerted practices, within the meaning of competition law. Since many of the retailers that councils would like to involve in local schemes may be smaller businesses that do not have detailed knowledge of competition law, councils have a duty of care to ensure that they are not asking them to breach the law and/or do not put them in a position where they might inadvertently do so. Moreover, it is possible that if a local authority encouraged or facilitated breaches of competition law, this could, in certain

circumstances, possibly lead to a breach of European Union law by that authority.

While there is a certain competition law risk to retailers arising from some aspects of Reducing the Strength schemes, the risk is manageable if councils build in certain features to their schemes. **The key point is to ensure that retailers are aware they must make individual and independent decisions about whether to participate in such schemes. Specifically they should avoid engaging in any form of co-ordinated action or in agreements or concerted practices that would reduce or prevent competition between them. In particular, retailers should avoid discussing or sharing sensitive commercial information (eg about prices, costs, volumes, future commercial strategies) with competitors.**

This risk is mostly likely to emerge at the start-up of a scheme, as you work with retailers to seek their participation, and should be considered in the design and implementation of the scheme. **The easiest way to avoid this risk is to engage bilaterally with individual retailers, rather than with groups of retailers together.** This may have other benefits, in terms of being a more effective approach in terms of engaging retailers. However, it is a resource intensive approach. If you do decide to meet with retailers jointly in the course of setting up a scheme, it would be sensible to **set out the competition law risk upfront**, including what is not permitted during the meeting (eg sharing of commercially sensitive information between competitors). You should then ensure that you:

- set out the intended approach
- set out why this is being done

- set out what the benefits to the area/ residents/businesses will be (ie the public policy message)
- offer the opportunity to ask questions
- **close down any conversation which appears to give rise to coordination** (eg a retailer indicating during the meeting, in front of its competitors, its future commercial strategy regarding high-strength alcohol).

**But do not:**

- invite people to indicate publically if they will sign up to the scheme there and then. It is acceptable to ask them to inform you privately if they will join up, but a public commitment in advance of a scheme being launched could be interpreted as collusion
- inform retailers, collectively or individually, of other businesses that have indicated they will, or might, join the scheme.

It is also **sensible to be mindful of the competition law risk when thinking about communicating the launch of the scheme**. It is fine to hold a launch event and develop branding for the scheme and once the scheme is live, you may wish to name businesses involved and provide branding and promotional materials for participating businesses to display if they wish. However, **participating businesses should not be named or advertise their participation before the scheme is formally launched. Councils should also avoid encouraging people to sign up by naming (or mentioning in bilateral discussions with retailers) other businesses which are participating or plan to participate** – retailers should be convinced to join by the public policy message only.

These actions should help to protect retailers from falling foul of competition law. It would be sensible to demonstrate, as part of a due-diligence approach, that you have considered and taken account of these issues through a simple competition law self-assessment undertaken during the design stage.

Guidance on competition issues regarding Reducing the Strength and competition law more generally is available on the CMA website<sup>5</sup>.

## Licensing conditions and Reducing the Strength schemes

If you are including a licensing approach in your scheme, you can only do what is permitted by the Licensing Act 2003. Although appropriate in individual circumstances, Reducing the Strength conditions on licences should be approached with caution and never as part of a blanket approach. Two key considerations are that:

- conditions should promote the licensing objectives.
- standard conditions should be avoided: conditions should relate to individual premises.

If these two criteria are met, then the wording of the clause should be carefully considered. It must be:

- appropriate
- proportionate
- understandable
- achievable
- enforceable
- not duplicated in other primary legislation
- **individual and tailored to the premises**
- self-contained.

<sup>5</sup> <https://www.gov.uk/government/collections/competition-and-consumer-law-compliance-guidance-for-businesses>



# Case studies



## **Suffolk – perhaps more than any other area – has led the way with tackling the consumption of high-strength, cheap alcohol.**

The campaign was launched in Ipswich in September 2012 in a partnership between Suffolk County Council, Ipswich Borough Council, Suffolk Constabulary and the East of England Co-operative Society after complaints from the public and businesses that street drinking was getting out of hand.

The scheme is three-pronged. Off licences have been asked to agree to stop selling cheap high-strength alcohol of 6.5 per cent abv and above, while the police have taken action where regular street drinking causes disturbances and the county council has invested in outreach workers to encourage drinkers into treatment.

The campaign was kick-started with a launch event for retailers at Ipswich Town Football Club where a short film was shown about the damaging effects of street drinking from an individual's and a business' point of view. The latter included such issues as loss of custom from people being put off by street drinkers congregating outside shops. This event was accompanied by media coverage and followed up by the partners visiting local businesses to discuss the benefits of supporting the campaign.

The responsible authorities have also used the licensing process to nudge retailers into taking part. When applications are approved the council visits businesses to ask them to consider signing up to the campaign outlining the benefits to the local area and potential gains for traders – although the scheme remains voluntary. The only situations where the council might impose restrictions on the sale of cheap strong alcohol are if there is evidence of sales of high-strength alcohol to drunk persons, which is an offence, and/or there is a direct link to problems in the wider area which can be attributed to such. In these cases competition law does not apply and a restriction on sale of certain products can be enforced. However, this has only been used four times.

The campaign has proved incredibly successful. Ninety out of 138 off-licence premises have signed up, including big chains like Tesco, Sainsbury's and Morrisons.

In terms of street drinking; numbers have dropped from a total of 70 individuals before the campaign was launched to just over 20. Street drinker events – defined as incidents in which the public have contacted the police – fell by nearly 25 per cent in the year after the launch of the campaign.

This success has led to the initiative being expanded to other urban areas in Suffolk, such as Lowestoft.

Public health engagement manager Simon Aalders says: "We have been delighted with how it has worked out. The most important principle is that you work together. The police have a dedicated officer for the campaign, while public health has funded two outreach workers for it. One type of intervention alone

– enforcement, restricting supply or enhanced treatment – doesn't work, for schemes to be successful all three elements must be implemented. You will need to have medium to long term commitment from all partners.”

Mr Aalders believes the effect has been more far-reaching than the initial aim of the scheme, as cheap high-strength alcohol is not just consumed by street drinkers. Sales figures from the East of England Co-operative Society, before it became involved, show in some very deprived areas sales of 6.5 per cent abv and above accounted for nearly a fifth of alcohol sales. The Co-op and other stores have observed that profits from alcohol sales have not decreased as consumers purchase different, weaker alcohol products. The premium alcohol product market remains unchanged.

He also says the campaign seems to have changed behaviour. “People haven't just switched to the next strongest brand, for example 6.4 per cent, but actually to 3 or 4 per cent abv brands.”

# Case studies



**Portsmouth is one of the UK's most densely populated areas. With more than 180 off licences in the city, people are never far from somewhere they can buy a drink.**

But the easy availability of alcohol is causing problems. Over 40,000 people – one in four adults – drink at harmful levels and alcohol-related admissions are well above the national average. Overall alcohol misuse is estimated to cost the city £74 million a year.

Like many areas, Portsmouth has tried a combination of education and sensible drinking promotion as well as using dispersal orders to tackle anti-social behaviour.

But last autumn the Safer Portsmouth Partnership decided to take a different tack by targeting the sale of high-strength alcohol.

The Reducing the Strength campaign focuses on the cheap sales of beers, lagers and ciders over 6.5 percent abv.

Retailers were initially sent questionnaires by the council officer and police officer who run the scheme. But after little response the two officers started visiting shops to discuss the plans face-to-face.

This proved more effective. Six months over half of the city's 180+ off-licences had signed up and agreed not to sell the high-strength alcohol. Some of the agreements have been made verbally, while others have agreed to have written conditions on their licences.

Exceptions are made for premium products, such as speciality ales and ciders.

Importantly, in communication with retailers, Portsmouth has been very aware of its competition law responsibilities. No confidential retailer information has been shared and it has been clear throughout that it is for the retailers themselves to determine whether or not to sign up to the scheme

Community safety project officer Rob Anderson-Weaver, who leads the project for Portsmouth City Council's Safer Portsmouth Partnership, says: "Once we got out there we found retailers were much more open to discussing the idea. We talked to them about the effect this high-strength alcohol has. It is not just the street drinking, but the health impact. These shops are part of the community and when we put it to them we found many were willing to take it on board."

To ensure that all businesses are treated equally, Portsmouth has started suggesting during the licensing process that people sign-up too. The aim now is to try to have 100 retailers signed up by the end of the year.



# Want to know more?

**Competition and Markets Authority (CMA)**

[www.gov.uk/government/publications/high-strength-alcohol-schemes-competition-law-advice](http://www.gov.uk/government/publications/high-strength-alcohol-schemes-competition-law-advice)

**Suffolk's Reducing the Strength campaign**

[www.suffolk.police.uk/safetyadvice/personalsafety/alcoholawareness/reducingthestrength.aspx](http://www.suffolk.police.uk/safetyadvice/personalsafety/alcoholawareness/reducingthestrength.aspx)

**LG Inform**

[www.local.gov.uk/about-lginform](http://www.local.gov.uk/about-lginform)

**Local alcohol profiles for England**

[www.lape.org.uk](http://www.lape.org.uk)

**Street level crime maps for England and Wales**

[www.police.uk](http://www.police.uk)

**Alcohol Strategy (published by the Home Office in 2012)**

[www.homeoffice.gov.uk/drugs/alcohol-strategy](http://www.homeoffice.gov.uk/drugs/alcohol-strategy)

**Public Health Responsibility Deal pledge relating to high-strength alcohol**

<https://responsibilitydeal.dh.gov.uk/pledges/pledge/?pl=54>

**Government guidance on 'below cost sales'**

[www.gov.uk/government/publications/banning-the-sale-of-alcohol-below-the-cost-of-duty-plus-vat](http://www.gov.uk/government/publications/banning-the-sale-of-alcohol-below-the-cost-of-duty-plus-vat)

**Local alcohol partnerships**

[www.portmangroup.org.uk/responsibility-programmes/landing\\_page/local-partnerships](http://www.portmangroup.org.uk/responsibility-programmes/landing_page/local-partnerships)

**Safer Portsmouth Partnership**

[www.saferportsmouth.org.uk](http://www.saferportsmouth.org.uk)

[reducingthestrength@hampshire.pnn.police.uk](mailto:reducingthestrength@hampshire.pnn.police.uk)



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