

Licensing Sub-Committee

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Licensing Sub-Committee

Section 1 - Licensing Officers Report



**LICENSING
SUB-COMMITTEE**

REPORT

10 11 2011

Subject Heading:

Premises licence application for J & B Convenience Store, 182 South Street, Romford RM1 1TR

Report Author and contact details:

Paul Campbell – Licensing Officer
01708 432777
licensing@havering.gov.uk

This application for a premises licence is made by C S Jacks Limited under section 17 of the Licensing Act 2003. The application was received by Havering's Licensing Authority on 22nd September 2011.

Geographical description of the area and description of the building

The premises is a ground floor shop with a single shop frontage onto South Street Romford. It was an empty premises and is being refurbished as a convenience store.

The application is for a premises licence within the Romford Ring Road and as such is subject to the London Borough of Havering saturation policy.

The premises is situated on the west side of South Street about 200 metres south of Romford Train Station and 120 metres north of the Romford Ring Road. The shop is directly next to the garden entrance to Gibson Court where a number of the representations come from; this is a recessed, covered, gated entrance with electronic key pad entry system for the residents. Gibson Court is a block of 49 apartments for elderly people. Other properties in the vicinity of the premises are a mixture of commercial and residential properties.

The premises is within easy walking distance of public transport links and Romford Town Centre.

A map of the area is attached to assist the committee.

Licensing Sub-Committee, 10th November 2011

Details of the application

Supply of Alcohol (off supplies only)		
Day	Start	Finish
Monday to Sunday	06:00hrs	00:00hrs

Seasonal variations & Non-standard timings

There are no seasonal variations or non-standard timings applied for in this application.

Comments and observations on the application

A request was made to the applicant's agent for the newspaper advertisement on 21/10/11 but had not been seen at the time of writing this report. The notice on the premises was inspected by the licensing officer and checked to be in place for the correct period.

Summary

There were 26 valid representations against this application from interested parties.

There was one representation against this application from responsible authorities (Metropolitan Police)

Details of representations

Valid representations may only address the following licensing objectives:

- The prevention of crime and disorder
- The prevention of public nuisance
- The protection of children from harm
- Public safety

Interested parties' representations

The representations from the interested parties mainly fall under the headings of The Prevention of Public Nuisance and Public Safety.

Responsible Authorities' representations

The police representation outlines details relating to the four licensing objectives

There were no representations from the following responsible authorities:

- Public Health
- The London Fire and Emergency Planning Authority
- The Health & Safety Enforcing Authority
- The Trading Standards Service
- Planning Control & Enforcement
- Children & Families Service

Licensing Sub-Committee

Appendix 1 - Copy of the Application

J & B CONVENIENCE STORE
10709



**Application for a premises licence to be granted
under the Licensing Act 2003**

PLEASE READ THE FOLLOWING INSTRUCTIONS FIRST

Before completing this form please read the guidance notes at the end of the form.
If you are completing this form by hand please write legibly in block capitals. In all cases ensure that your answers are inside the boxes and written in black ink. Use additional sheets if necessary.

You may wish to keep a copy of the completed form for your records.

I/We C S JACKS LIMITED

(Insert name(s) of applicant)

apply for a premises licence under section 17 of the Licensing Act 2003 for the premises described in Part 1 below (the premises) and I/we are making this application to you as the relevant licensing authority in accordance with section 12 of the Licensing Act 2003

Part 1 – Premises Details

Postal address of premises or, if none, ordnance survey map reference or description J&B CONVENIENCE STORE 182 SOUTH STREET			
Post town	ROMFORD	Post code	RM1 1TR
Telephone number at premises (if any)			
Non-domestic rateable value of premises		£10250	

Part 2 - Applicant Details

Please state whether you are applying for a premises licence as

Please tick yes

- a) an individual or individuals * please complete section (A)
- b) a person other than an individual *
- i. as a limited company please complete section (B)
 - ii. as a partnership please complete section (B)
 - iii. as an unincorporated association or please complete section (B)
 - iv. other (for example a statutory corporation) please complete section (B)
- c) a recognised club please complete section (B)
- d) a charity please complete section (B)

- e) the proprietor of an educational establishment please complete section (B)
- f) a health service body please complete section (B)
- g) a person who is registered under Part 2 of the Care Standards Act 2000 (c14) in respect of an independent hospital please complete section (B)
- h) the chief officer of police of a police force in England and Wales please complete section (B)

* If you are applying as a person described in (a) or (b) please confirm:

Please tick yes

- I am carrying on or proposing to carry on a business which involves the use of the premises for licensable activities; or
- I am making the application pursuant to a
 - statutory function or
 - a function discharged by virtue of Her Majesty's prerogative

(A) INDIVIDUAL APPLICANTS (fill in as applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input checked="" type="checkbox"/>	Please tick yes
Current postal address if different from premises address					
Post Town				Postcode	
Daytime contact telephone number					
E-mail address (optional)					

SECOND INDIVIDUAL APPLICANT (if applicable)

Mr <input type="checkbox"/>	Mrs <input type="checkbox"/>	Miss <input type="checkbox"/>	Ms <input type="checkbox"/>	Other Title (for example, Rev)	
Surname			First names		
I am 18 years old or over				<input type="checkbox"/>	Please tick yes

Current postal address if different from premises address			
Post Town		Postcode	
Daytime contact telephone number			
E-mail address (optional)			

(B) OTHER APPLICANTS

Please provide name and registered address of applicant in full. Where appropriate please give any registered number. In the case of a partnership or other joint venture (other than a body corporate), please give the name and address of each party concerned.

Name C S JACKS LIMITED
Address 1 ST FLOOR 2 WOODBERRY GROVE NORTH FINCHLEY LONDON N12 0DR
Registered number (where applicable) 06837385
Description of applicant (for example, partnership, company, unincorporated association etc.) A PRIVATE LIMITED COMPANY
Telephone number (if any)
E-mail address (optional)

Part 3 Operating Schedule

When do you want the premises licence to start?

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

If you wish the licence to be valid only for a limited period, when do you want it to end?

Day	Month	Year
<input type="text"/>	<input type="text"/>	<input type="text"/>

Please give a general description of the premises (please read guidance note1)
A PURPOSE BUILT BRIVK PREMISES OPERATING AS A GENERAL CONVENIENCE STORE

If 5,000 or more people are expected to attend the premises at any one time, please state the number expected to attend.

What licensable activities do you intend to carry on from the premises?

(Please see sections 1 and 14 of the Licensing Act 2003 and Schedules 1 and 2 to the Licensing Act 2003)

Provision of regulated entertainment

Please tick yes

- a) plays (if ticking yes, fill in box A)
- b) films (if ticking yes, fill in box B)
- c) indoor sporting events (if ticking yes, fill in box C)
- d) boxing or wrestling entertainment (if ticking yes, fill in box D)
- e) live music (if ticking yes, fill in box E)
- f) recorded music (if ticking yes, fill in box F)
- g) performances of dance (if ticking yes, fill in box G)
- h) anything of a similar description to that falling within (e), (f) or (g) (if ticking yes, fill in box H)

Provision of entertainment facilities:

- i) making music (if ticking yes, fill in box I)
- j) dancing (if ticking yes, fill in box J)
- k) entertainment of a similar description to that falling within (i) or (j) (if ticking yes, fill in box K)

Provision of late night refreshment (if ticking yes, fill in box L)

Supply of alcohol (if ticking yes, fill in box M)

In all cases complete boxes N, O and P

M

Supply of alcohol Standard days and timings (please read guidance note 6)			Will the supply of alcohol be for consumption (Please tick box) (please read guidance note 7)	On the premises	<input type="checkbox"/>
				Off the premises	<input checked="" type="checkbox"/>
				Both	<input type="checkbox"/>
Day	Start	Finish	State any seasonal variations for the supply of alcohol (please read guidance note 4)		
Mon	06.00	00.00			
Tue	06.00	00.00			
Wed	06.00	00.00			
Thur	06.00	00.00			
Fri	06.00	00.00			
Sat	06.00	00.00			
Sun	06.00	00.00			
			Non standard timings. Where you intend to use the premises for the supply of alcohol at different times to those listed in the column on the left, please list (please read guidance note 5)		

State the name and details of the individual whom you wish to specify on the licence as premises supervisor

Name MR JOSEPH JACKSON-COLE	
Address 13 WELLER HOUSE WINGFIELD STREET BUCKLAND PORTSMOUTH	
Postcode	PO1 4PA
Personal Licence number (If known) TBA	
Issuing licensing authority (If known) PORTSMOUTH CITY COUNCIL	

N

Please highlight any adult entertainment or services, activities, other entertainment or matters ancillary to the use of the premises that may give rise to concern in respect of children (please read guidance note 8)

O

Hours premises are open to the public Standard days and timings (please read guidance note 6)			<u>State any seasonal variations</u> (please read guidance note 4)
Day	Start	Finish	
Mon	00.00	23.59	
Tue	00.00	23.59	
Wed	00.00	23.59	
Thur	00.00	23.59	<u>Non standard timings. Where you intend the premises to be open to the public at different times from those listed in the column on the left, please list</u> (please read guidance note 5)
Fri	00.00	23.59	
Sat	00.00	23.59	
Sun	00.00	23.59	

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

a) General – all four licensing objectives (b,c,d,e) (please read guidance note 9)

The DPS fully understands his roles and responsibilities concerning the four licensing objectives obtained within the 2003 Licensing Act, a comprehensive breakdown of these objectives and how to ensure they are met are detailed below. The DPS attended the APLH level 2 training programme and his personal licence will be issued by Portsmouth City Council. The DPS will take full responsibility of ensuring all staff are trained and have full knowledge of all licensing issues concerning them under the 2003 Licensing Act including the Challenge 25 rule.

b) The prevention of crime and disorder

The client will have installed to the premises a CCTV digital recording system with a minimum of 31 days recording capability to ensure the prevention of crime & disorder which will cover both internal and external areas. The CCTV will follow the DCMS guidelines for camera systems in licensed premises and will be in accordance with Police recommendations. All members of staff shall be trained to deal with suspicious customers efficiently. All CCTV recordings shall be available to local Police immediately upon request. One member of staff shall be trained to keep the CCTV in full working order at all times. Any alcoholic drinks purchased in the shop shall be for consumption off and away from the premises and strict enforcements shall be in place to ensure this is always adhered to.

c) Public safety

The installed and approved CCTV digital recording system of the premises with a minimum of 31 days recording capability, will monitor all public safety issues. The DPS will be responsible for conducting a Fire Risk Assessment and also a Health & Safety Risk Assessment for the licensed premises. All notices in relation to public health & safety will be displayed at the premises. The DPS will also ensure the premises will be operated in line with the Health & Safety Act and any environmental health issues will be the responsibility of both the licence holder for the premises and the DPS.

d) The prevention of public nuisance

The DPS/Premises licence holder fully understands that it is their duty to prevent their business causing any nuisance to any local residents or businesses. They will monitor the external premises area in relation to any anti-social behaviour or public nuisance. The premises will only accept trade deliveries or rubbish collections during normal working hours. The DPS will also monitor the exterior of the premises to ensure litter is kept to a minimum. In the event of any anti-social behaviour both inside and outside of the premises, the DPS will make any CCTV recordings available to the local Police immediately.

e) The protection of children from harm

The DPS will be responsible for ensuring all staff working within the premises will be fully trained and aware of the Challenge 25 Rule. The premises will only accept valid forms of identification such as photo driving licence, passport and home office approved ID cards displaying the national proof of age standard scheme (PASS hologram). All customers who look under the age of 25 shall be challenged to prove their identity when purchasing alcohol. The premises will also have a refusals register, which will be kept at the premises at all times and all refusals by any member of staff shall be recorded. The register will be made available to Responsible Authorities on request.

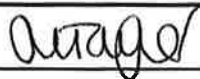
Please tick yes

- I have made or enclosed payment of the fee
- I have enclosed the plan of the premises
- I have sent copies of this application and the plan to responsible authorities and others where applicable
- I have enclosed the consent form completed by the individual I wish to be premises supervisor, if applicable
- I understand that I must now advertise my application
- I understand that if I do not comply with the above requirements my application will be rejected

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

Part 4 – Signatures (please read guidance note 10)

Signature of applicant or applicant's solicitor or other duly authorised agent (See guidance note 11). **If signing on behalf of the applicant please state in what capacity.**

Signature	
Date	20/09/2011
Capacity	Licensing Consultants on behalf of Client

For joint applications signature of 2nd applicant or 2nd applicant's solicitor or other authorised agent. (please read guidance note 12). **If signing on behalf of the applicant please state in what capacity.**

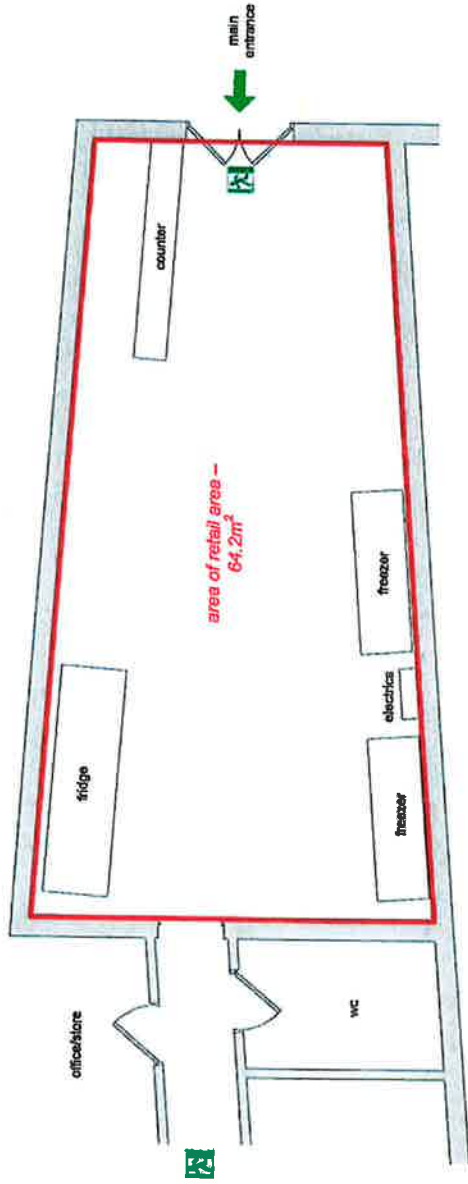
Signature	
Date	
Capacity	

Contact name (where not previously given) and postal address for correspondence associated with this application (please read guidance note 13)			
Personal Licence Training Ltd Unit 3 The Oaks Clews Road			
Post town	Redditch	Post code	B98 7ST
Telephone number (if any)	01527 544 780		
If you would prefer us to correspond with you by e-mail your e-mail address (optional) jo.taylor@personallicensetraining.co.uk			

Notes for Guidance

1. 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.
2. Where taking place in a building or other structure please tick as appropriate. Indoors may include a tent.
3. For example the type of activity to be authorised, if not already stated, and give relevant further details, for example (but not exclusively) whether or not music will be amplified or unamplified.
4. For example (but not exclusively), where the activity will occur on additional days during the summer months.
5. For example (but not exclusively), where you wish the activity to go on longer on a particular day e.g. Christmas Eve.
6. Please give 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.
7. If you wish people to be able to consume alcohol on the premises please tick on, if you wish people to be able to purchase alcohol to consume away from the premises please tick off. If you wish people to be able to do both please tick both.
8. Please give 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, the presence of gaming machines.
9. Please list here steps you will take to promote all four licensing objectives together.
10. The application form must be signed.
11. An applicant's agent (for example solicitor) may sign the form on their behalf provided that they have actual authority to do so.
12. Where there is more than one applicant, both applicants or their respective agents must sign the application form.
13. This is the address which we shall use to correspond with you about this application.

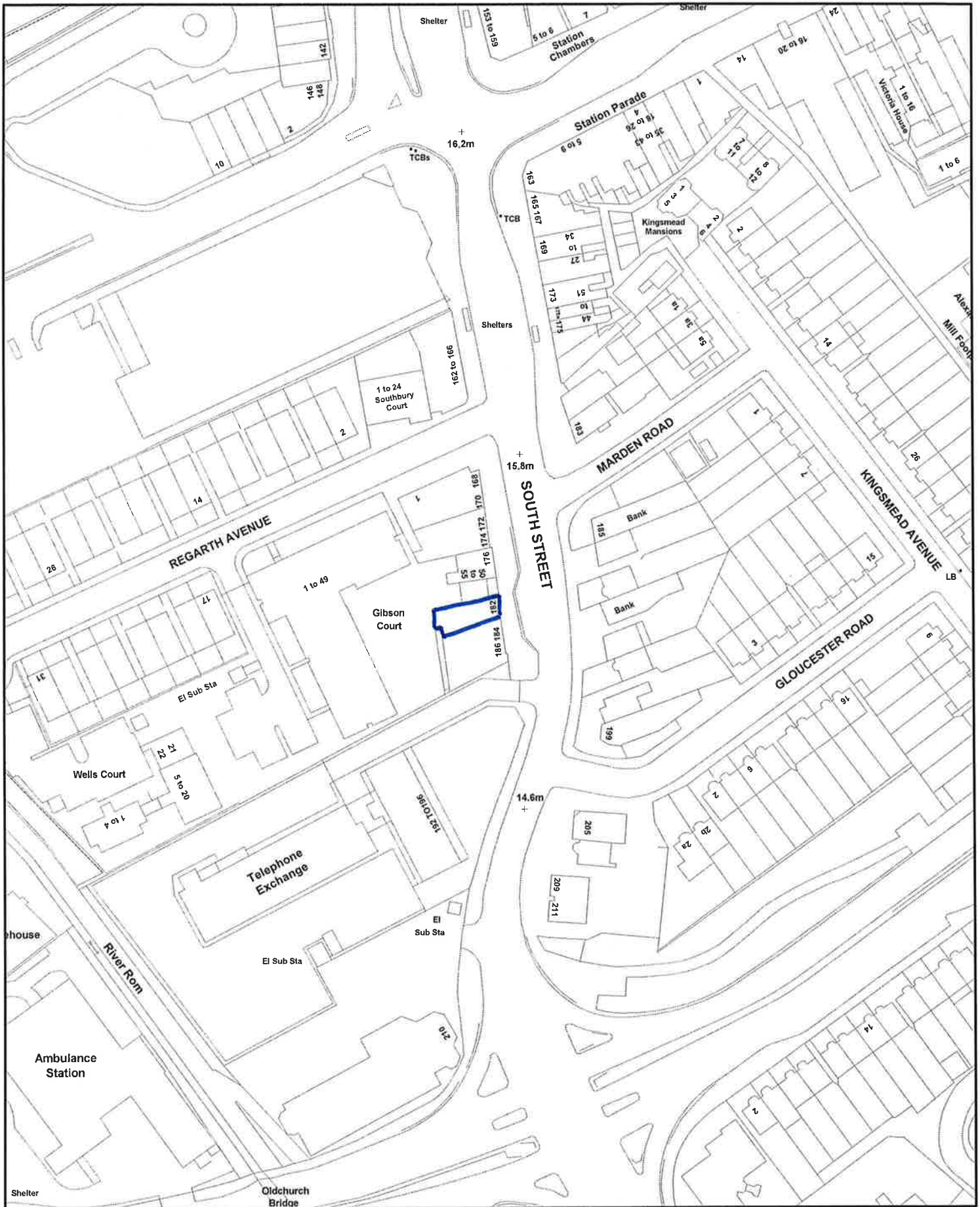
DRAWING SYMBOLS	
	Fire Exit
	CCTV
	Licensed Area



Drawing No. 002475	Drawing: Licensing Plan	Project: J + B Convenience Store, 182 South Street, Romford. RM1 1TR	Date 08.09.2011	Sheet 1 of 1
UK Surveyors Ltd www.uksurveyors.net djr@uksurveyors.net Mobile: 07814-452536 Office: 01543-22915			Do not scale off this plan	
			Drawn By: DLR	Scale 1:100 @ A4

Licensing Sub-Committee

Appendix 2 - Map of local area

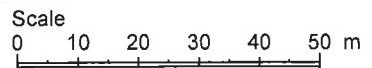


J & B Convenience Store

Map Reference: TQ5188SW



Scale @ A4 1:1250
Date: 21/10/2011



Havering
LONDON BOROUGH

London Borough of Havering
Town Hall, Main Road
Romford, RM1 3BD
Tel: 01708 434343

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Licensing Sub-Committee

Appendix 3 - Representations

41 GIBSON COURT

REINHOLD AVENUE

ROSEBUSH RMI. IAS.

DEAR MR. [unclear]

RE PREMISES APPLICATION FOR [unclear]
3000 182 SOUTH STREET ROSEBUSH

THE SIGN IS TO BE LOCATED IN THE FRONT OF
OUR GLASSY PORCH DEVELOPMENT. NEXT TO
OUR COMMERCIAL SIGNAGE UNDER AN ARCH
WHICH I FEAR MAY BECOME A IDEAL PLACE FOR
ANYONE TO TRAMP IF BUILT FROM THE SIGN

I WOULD LIKE TO OBJECT ON THREE
OBJECTIVES IN YOUR LETTER

- 1/ THE PREVENTION OF CRIME AND DISORDER
- 2/ THE PREVENTION OF PUBLIC NUISANCE
- 3/ PUBLIC SAFETY

WE MOVED HERE TO HAVE A HAPPY RETIREMENT
BUT UNFORTUNATELY THIS IS CAUSING SOME
WORRY

YOURS FAITHFULLY

[Signature]

MR & MRS D WHITEHEAD

From: Councillor Andrew Curtin
Sent: 19 October 2011 17:17
To: Paul Campbell
Subject: Objection to application number 10709

Dear Paul,

The above application relates to J and B Convenience Store at 182 South Street, Romford, RM1 1TR, which is in my Ward.

I wish to object to the application under all 4 criteria permissible under the Licensing Act.

INCREASE IN CRIME AND DISORDER.

There are already a number of other off licences in a very small area in this part of Romford. Adding another premises licensed to sell alcohol would be likely to lead to increased competition for business, including increased competition to sell alcohol to passers by. This would be likely to mean that retailers sought to sell alcohol at reduced prices, thus increasing the irresponsible consumption of alcohol in the area with a resultant increase in disorder in the area.

PUBLIC NUISANCE.

The site is directly next to residential properties at Gibson Court in South Street. Gibson Court is purpose built accommodation for older people. The application would be likely to result in a significant increase in nuisance experienced by residents here. There would be great increase in noise and rubbish resulting from people accessing and leaving the proposed store right by the entrance to the Gibson Court residential complex. People would be likely to gather in the area thinking they can purchase alcohol at the premises, with resultant onstreet noise and disturbance making a very negative impact on residents' general amenity and quality of life. The addition of yet another premises licensed to sell alcohol in this particular area, in addition to those within very close distance which already have a licence, would be likely to result in the area becoming known as an area in which there are many shops selling alcohol and therefore attracting more people for that purpose, again resulting in an increase in noise and nuisance for residents in the immediate vicinity. There is an entryphone controlled entry to Gibson Court immediately adjacent to the proposed site. The entrance is recessed. The application at this particular site would be likely to result in an increase in people sheltering in this recess, perhaps consuming alcohol, and causing nuisance to elderly residents here by pressing numbers on the entry phone system.

PUBLIC SAFETY.

Romford Town Centre has a clearly evidenced Saturation Policy, demonstrating that only exceptional new applications for alcohol licenses should be granted. This is not such an application. One of the reasons why there is a Saturation Policy is to enable the police to promote public safety in Romford. Romford has a number of pubs and clubs in it. For public safety reasons (as well as to prevent public nuisance and reduce the risk of crime and disorder) the aim is to create circumstances in which people disperse and return home quickly after these pubs and clubs close. The local authority, working in partnership with the police, aims to avoid facilities and uses which would attract people to remain in the town centre rather than returning straight home after their evening out. This application would result in a facility which would be likely to distract people (who may already be drunk leaving pubs and clubs) from returning straight home, encouraging them to purchase more drink and thus become a danger to themselves and others. The site is next to a bus stop and near a major public transport interchange, thus increasing the chances that people would see it and be attracted in to it, rather than going straight home. The congregation of people on this busy road would be likely to place them in greater danger, by virtue of revellers straying into the path of traffic on the road. It would also act against the aim of encouraging people to leave the town centre quickly and directly after their evening out which lays behind the

Paul Campbell

From: Councillor Frederick Thompson
Sent: 11 October 2011 13:30
To: Licensing; Paul Campbell
Subject: J&B Convenience Store 182 South Street Romford RM1 1TR, Application 10709

7a Balgores Crescent,
Romford,
Essex, RM2 6AB

Dear Licensing Officers,

With reference to the application for a premises licence for the J & B Convenience Store to sell alcohol Monday to Sunday 06.00 to 00.00 (midnight) I wish to object. Romford Town Centre already has too many licensed premises but I wish to object on the grounds of public safety because its proposed hours facilitate the objectionable habit called pre-loading where visitors to nightclubs buy and consume usually high strength alcohol prior to entering aforesaid nightclubs to avoid buying what would usually be a lot dearer unit for unit. Besides the obvious dangers of quick inebriation it damages public safety through health effects.

I further object on the basis of public nuisance. The premises are close by retirement flats housing a large number of the elderly who already suffer from noise nuisance and this outlet may well act as a draw holding people in the area longer than presently occurs.

The police are already overstretched late at night in Romford and Hornchurch Town Centres and I fear that this lessens the necessary protection of children from harm as under 18 year old teenagers will be more able to pressure passing adults into making illegal purchases for them. There is also an increased risk of young shoplifters in the later hours.

Regards,

Cllr. Frederick Thompson
Tel: 01708 747993
Cell: 07895 096 765

For Personal Attention
of Paul Campbell

A. J. REDNALL
36, Gibson Court
Rearth, Ave.
Rotherham RM11 1TS
19/10/2011



Dear Sirs,

Re application of new premises licence
for convenience store also selling
Alcohol between 6 AM and 12 midnight
daily
The address of 182 South St. Rotherham

I wish to object most strongly to
the issue of a licence for the above
premises. I believe this is for 24 hours
a day and to include the sale of alcohol.

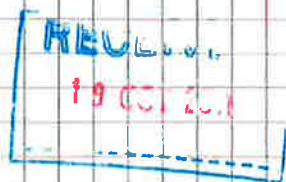
My objections are.

- ① There are already far too many
similar shops/stores in the immediate
area as expressed in South Street, Lida, and
Victoria Road.
- ② It is quite clear that another shop
selling alcohol will only increase
the problems of the police in extending
Area problems from the Town Centre where
many of the problems are Alcohol related.
- ③ I am particularly concerned as I
live at Gibson Court and I am
already scared to go out in the evening
because of people in groups and the
noise for drug
Most of the residents at Gibson Court
have the same fears. We are all old
retired people.
- ④ If opposition to the application is NOT
accepted please restrict sale of alcohol
between 11 AM to 9 PM.

- ⑤ If possible refuse licence for sale of alcohol.
- ⑥ If alcohol licence granted ensure that law is adhered to with regard to sale to children of alcohol.
- ⑦ The shop should be adequately staffed and that ground outside is kept clear of cars, rubbish, etc.

To sum up I am against the issue of a licence for yet another convenience store and particularly where permission is given for the sale of alcohol.

Yours faithfully
P. B. [Signature]



Mrs J Blackie
Flat 40
Gibson Court
Rogarth Avenue
ROMFORD
Essex
RM1 3AJ



01708 733976

With Reference to your letter 10th October 2011

J-B CONVENIENCE STORE

182 South Street. Romford RM1 1TR

Yates is next door to our garden gate in South Street, which is a quite area we have no clubs, Pubs, and the shops close at 6-0 pm, Over the road by the bus stop is a ~~License~~ convenience shop,

We do not need a shop next door open from 10-0 am - midnight. From 9.0 pm onwards the owner would hope to sell a large amount of alcohol to JUSTIFY staying open. Staff how many working? wages lights heating etc? This would need a large amount of customers, who will be outside our gate, using our back way maybe our garden, and if we come home late? what then?

Close the shop at 6-0 pm No alcohol

Please

Jasmine Blackie



PAUL CAMPBELL.
LICENSING OFFICER.
MERCURY HOUSE.
ROMFORD. RM1 3SL

MRS & MRS BLOOM
29 GIBSON COURT
REGARTH AVENUE
ROMFORD
ESSEX RM1 1AJ

19th OCTOBER 2011

DEAR MR CAMPBELL,

J & B CONVENIENCE STORE 182 SOUTH STREET
ROMFORD. RM1 1TR. LICENSING ACT. 2003

IN REPLY TO YOUR LETTER DATED 22 SEPT
IN CONNECTION WITH THE ABOVE LICENSING ACT.
AS THIS SHOP IS NEXT DOOR TO OUR
RETIREMENT HOME MY WIFE & I ARE CONCERNED
REGARDING OUR SECURITY AS WE HAVE TO TAP IN
A CODE NUMBER TO ENTER OUR PREMISES, WHICH
IS IN FULL VIEW OF EVERYONE LOITERING OUTSIDE
THE GATE.

ALSO WE CONSIDER THAT THERE ARE
ALREADY TOO MANY SHOPS & STORES IN ROMFORD SELLING
ALCOHOL & FEEL THAT THIS LICENCE SHOULD BE DENIED.

YOURS TRULY.

J. Bloom & J. Bloom

12, Gibson Court,
Regent Avenue,
Rempford,
Essex. RM1 1HQ

Dear Mr Campbell,
Re. License Application

I am responding to your
letter 22-9-11, re the above
license application.

I would like to object to
the application to the shop
next to our front gate, which
is set in a porch, as is
easy to climb over to get
into the grounds of our
apartments

Yours Sincerely
Mrs. A. Broomfield

**From; Mrs E Brown
25 Gibson Court
Regarth Avenue
Romford
RM1 1AJ**

18th October 2011

London Borough of Havering

Your Ref; PPC/010709

For the attention of Mr Paul Campbell

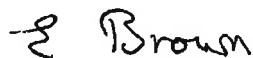
Dear Mr Campbell,

With regard to the application for an alcohol licence and 24 hour shop for 182 South Street, Romford, I am a resident in a retirement complex, and although my postal address is Regarth Avenue, the main pedestrian access for the flats is via South Street, immediately adjacent to number 182.

My main objection to the granting of a late an alcohol licence and 24 hour shop opening is on the grounds of a public nuisance. I stongly feel that elderly people using the entrance would feel intimidated if people are hanging around outside the shop, particularly late at night, and especially if the shop's customers had already been drinking!

I do not think it is an appropriate use of retail space immediately next to the entrance of a retirement complex.

Yours faithfully



Mrs E Brown

**From; Mrs P Brown
24 Gibson Court
Regarth Avenue
Romford
RM1 1AJ**

18th October 2011

London Borough of Havering

Your Ref; PPC/010709

For the attention of Mr Paul Campbell

Dear Mr Campbell,

With regard to the application for an alcohol licence and 24 hour shop for 182 South Street, Romford, I am a resident in a retirement complex, and although my postal address is Regarth Avenue, the main pedestrian access for the flats is via South Street, immediately adjacent to number 182.

My main objection to the granting of a late an alcohol licence and 24 hour shop opening is on the grounds of a public nuisance. I stongly feel that elderly people using the entrance would feel intimidated if people are hanging around outside the shop, particularly late at night, and especially if the shop's customers had already been drinking!

I do not think it is an appropriate use of retail space immediately next to the entrance of a retirement complex.

Yours faithfully



Mrs P Brown



JAY'S HEEL BAR
169 SOUTH ST
ROMFORD
ESSEX
RM8 1PS

Havering London Borough
Housing & Public Protection
London Borough of Havering
Mercury House
Mercury Gardens
Romford RM1 3SL

Date 17/10/11.

**Premises Licence Application – J&B Convenience Store, 182 South Street,
Romford RM1 1TR**

We wish to object to the above application on the following grounds:

There are two convenience stores (Londis) and MAD along with ALDI supermarket in the Romoford South Street already with off-sale licenses

1) There is also two public houses- all sited in the commercial part of the town. With these 5 premises already with licences, we really do not feel there is a need for yet another business selling alcohol.

3) We are really concerned that the availability of an off-sales license at these premises would attract additional rowdy behaviour outside the South Street late at night.

We hope the council will understand our real concerned will reject the application totally

Yours faithfully





16 Gloucester Road
Romford
RM1 1QJ

18th October 2011

Licencing Authority
London Borough of Havering
Mercury House
Mercury Gardens
RM1 3HP

Re J& B Convenience Store (CS Jacks Limited) – 182 South Street, Romford RM1 1TR
Application for Permit for Sale of Alcohol from 6-am to 12-Midnight Daily

Dear Sirs,

I am aware of the application for a permit for sale of alcohol from 6am to 12 midnight at 182 South Street Romford.

I feel that I must object in the strongest possible terms to this application.

There is already a problem with people drinking street late and night in this area. I live in Gloucester Road which is very close to the proposed store at 182 South Street; indeed we will be one of the nearest side streets. We frequently find cans and bottles discarded and strewn in the pavements in Gloucester Road through youths and others drinking in the street.

There is already sufficient supply of alcohol from the Londis and other establishments in South Street.

A late licence to sell alcohol from the proposed store up to midnight will only increase the degree of on street and underage drinking.

A decision to make alcohol available to people leaving the clubs and pubs in further up South Street at that time of night can only cause an increase in lawlessness and drunken behaviour and would be highly inadvisable in my view.

The local residence will **not** benefit from such late off-licence services. The only 'community' that this late licence will service are drunken clubbers passing through South Street; this will be to the detriment of local residence.

I would ask the Licencing Authority to reject the licence application, either completely or at the very least to limit the hours of sale of alcohol to more sensible hours.

Yours sincerely

Nigel Cole

Nigel.cole@btinternet.com
07780 990 448

From: Licensing
Sent: 20 October 2011 08:53
To: Paul Campbell
Subject: FW: PPC/010709 - J&B Convenience Store - Premises Licence Application 182 South Street Romford - Attn Paul Campbell

Importance: High
Sensitivity: Confidential

From: Jackie Connolly
Sent: 19 October 2011 20:20
To: Licensing
Subject: PPC/010709 - J&B Convenience Store - Premises Licence Application 182 South Street Romford - Attn Paul Campbell
Importance: High
Sensitivity: Confidential

To Whom It May Concern,

My name is Mrs Margaret Connolly and I live at 55 Gibson Court , Regarth Avenue, Romford Essex RM1 1AJ.

I received a letter from you recently but due to the death of my husband on 1st October I have only just had the opportunity to respond.

I am writing to formally lodge an objection to the above premises licence application. I am emailing [via my daughter's email account] due to the fact that the deadline for objections is 20th October 2011.

The proposed premises address is directly below the block of flats in which I have lived for the last 10 years. It is a retirement complex and all the residents are aged 60+ and by definition, more vulnerable than some other residents in Romford.

My objections are as follows:

due to the fact that there will be alcohol sold from early morning to midnight every day of the week I am extremely concerned that there will be an increase in petty crime and disorder due to the fact that there will be people buying alcohol and potentially drinking nearby - i.e. in our retirement complex which is directly next to and below the proposed premises.

I am concerned that children, often in groups, will use the store, potentially buying alcohol; this could result in public disorder, petty vandalism, anti-social behaviour and intimidatory behaviour towards members of the public in the vicinity including me and other residents of Gibson Court. This threat to public safety really concerns me.

I feel that there are too many stores of this type in Romford, for example there are at least three in the very near vicinity of this proposed site,(not to mention a large number of pubs and clubs) all selling alcohol. I feel that another outlet will merely attract more young people to the store and potentially increase the likelihood of creating a public nuisance, with increased levels

of noise and litter pollution.

Aside from that there is the issue of protection of children; they do not need to be exposed to yet another place where they could potentially be able to purchase cigarettes, alcohol and potentially be targeted by unsuitable members of the local community.

I hope that you will seriously consider my objections. If you wish to discuss further please contact me at my home address.

Many thanks

Margaret Connolly
19th October 2011

For the attention of Paul Campbell – London Borough of Havering

19th October 2011

Re: J & B Convenience Store

182 South Street Romford RM1 1TR

Further to the correspondence with regard to C S Jacks Limited application for a new premises licence at the above premises which I received from Dave Leonard, Havering Borough Police.

I would like to make representation against this application.

My Company has been based at 185 South Street Romford for the past 10 years I therefore have extensive knowledge of the area and experience, in more recent years, of the potential for anti-social behaviour which the Borough and Police have worked so hard to alleviate.

I feel that a store which is open 24 hours a day and permitted to sell alcohol between 6am to 12 midnight daily, would act as a public nuisance in terms of the amount of increased litter. This already is an ongoing problem for me.

It would be detrimental in relation to maintaining crime and disorder as there are already a significant number of pubs and clubs within the vicinity and this would provide yet another opportunity and venue for people to purchase alcohol. I have already had damage to the external part of my business premises on a number of occasions, due to irresponsible behaviour of people when they are waiting for cabs and the cab company happens to be next door.

My understanding also is that there is a curfew in this area and so how does the 24 hours a day application comply with this?

I am very mindful of how vulnerable and isolated local businesses felt in South Street during the recent riot disturbances and therefore would not want to encourage or agree to Businesses moving in the area which would threaten public safety and I feel that this application would due to the opening hours and sale of alcohol.

Finally, I feel that there are already more than a sufficient amount of businesses in South Street providing exactly the same services and goods as this application and at competitive prices. An additional convenience store is not needed and has the potential to create unfair and unhealthy competition to existing businesses in what is already a difficult economic climate.

This application I believe does not provide any added value to either the local community or local businesses.

Thank you for allowing me the opportunity to express my concerns.

Peter Connor

Partner/Director

Maybrick Property Maintenance

185 South Street

Romford

RM1 1QA



Mrs. R. Drew
42 Gibson Court
Regarth Avenue
Romford
Essex RM1 1AJ

19th October 2011

London Borough of Havering
Licensing Authority
Mercury House
Romford
Essex RM1 3BB

Dear Sir/Dear Madam,

I strongly object to the opening of a convenience store at 182 South Street Romford selling alcohol from 6am to 12 midnight daily.

This store would be adjacent to Gibson Court, a premises housing retired persons, which has a covered entrance to the premises gateway. This would facilitate a hide away where alcohol could be consumed prior to going into the late opening pubs and clubs and increasing the, unfortunate, use of this area in which to urinate. I feel this would cause unnecessary concern for the residence of Gibson Court and become a public nuisance.

I sincerely hope that this application is denied.

Yours faithfully,

R. Drew
R. Drew (Mrs)

11, Gibson Court
Rogarth Avenue.
Romford.
Essex.
RM1 1AJ.
19th October 2011.



Dear Sir,

Re your letter regarding licence application at premises 182, South Street. I live at retirement flats behind these premises, & am on the ground floor.

I object to licences, because of public nuisance, & public safety. I feel it's going to cause lots of young people hanging about South Street, & particularly round our entrance gate in the evening & late at night.

As my windows look onto the back of these premises, I feel worried about my safety, & the noise it will cause. I chose to come to live in these retirement flats as I am almost 90 years of age, & I thought it would be quiet & peaceful.

Yours faithfully,
Mrs. G. Fincham

10 Gibson Court
Regarth Avenue
Romford
RM1 1AJ

Public Protection
Housing & Public Protection
London Borough of Havering
Mercury House
Mercury Gardens
Romford
RM1 3SL

16th October 2011



Dear Mr Campbell ,

Re: Premises Licence Application- J & B Convenience Store, 182 South Street, Romford RM1 1TR

I am responding to your letter dated 22nd September 2011, regarding the above Premises Licence Application.

I would like to object to the application on three of the four objectives in your letter, namely;

- The Prevention of Crime and Disorder.
- The Prevention of Public Nuisance.
- Public Safety.

The shop in question is to be located in the block forming the front of our elderly person's complex and is positioned next to the gates to our communal gardens. The gates are set back, under an arch, in the block and gives a perfect hide-away for youths/young men to congregate whilst drinking the alcohol purchased from the convenience store.

My fear is that this will lead to drunkenness around the entrance to our complex and further, to men climbing the gates and gaining access to the gardens. My flat is on the ground floor with windows, including my bedroom, directly onto the gardens.

I am so worried about this that should you grant the licence I feel I could not stay here and would have to sell the home that I love. I thought Havering Council was anti street drinking and would not grant more licences to encourage it, especially one so close to vulnerable elderly people.

I know there are many other residents here who feel the same as I do and I urge you not to grant this licence.

Yours faithfully,

A handwritten signature in blue ink that reads "P Gosling". The letter "P" is written in a simple, blocky style, while "Gosling" is written in a more fluid, cursive script.

Mrs P Gosling

Public Protection
Housing & Public Protection
London Borough of Havering
Mercury House
Mercury Gardens
Romford
RM1 3SL

14 Gibson Court
Regarth Avenue
Romford
RM1 1AJ
19-10-11

Dear Mr Campbell

Re. Premises Licence Application - J & B Convenience Store
182 South Street, Romford RM1 1TR

In response to the above application I am strongly objecting to the following three objectives

The Prevention of Crime and Disorder
The Prevention of Public Nuisance
Public Safety.

The shop in question is immediately adjoining the gated entrance to our elderly persons accommodation. We already experience groups of people congregating in front of these gates and dread to think of alcohol consumption, in front of these gates adding to the problem.

Hoping you will consider our concerns most carefully

Yours truly

D. F. Green (Mrs)



FLAT 32 GIBSON CT.
REGARDH AOB
ROMFORD, ESSEX
RM1 1AJ

Havering London Borough
Housing & Public Protection
London Borough of Havering
Mercury House
Mercury Gardens
Romford RM1 3SL

Date 17/10/11

**Premises Licence Application – J&B Convenience Store, 182 South Street,
Romford RM1 1TR**

We wish to object to the above application on the following grounds:

There are two convenience stores (Londis) and MAD along with ALDI supermarket in the Romford South Street already with off-sale licenses

1) There is also two public houses- all sited in the commercial part of the town. With these 5 premises already with licences, we really do not feel there is a need for yet another business selling alcohol.

3) We are really concerned that the availability of an off-sales license at these premises would attract additional rowdy behaviour outside the South Street late at night.

We hope the council will understand our real concerned will reject the application totally

Yours faithfully

J.M. Kwan



FLAT 32 GIBSON CT.
REGARTH AVE
ROMFORD, ESSEX RM11AJ
14TH OCTOBER 2011

(Your REF. 763/11)?

MR. PAUL CAMPBELL

LOCAL AUTHORITY LICENSING OFFICER

LONDON BOROUGH OF HAVERING,

HOUSING AND PUBLIC PROTECTION,

5TH FLOOR MERCURY HOUSE,

MERCURY GARDENS, ROMFORD,

ESSEX. RM1 3SL

Dear Sir,

Re: J & B CONVENIENCE STORE, 182 SOUTH ST, ROMFORD
RM1 1TA

We have no objection to the above store selling newspapers and normal goods, what we do not want is a licence for the sale of alcohol to be granted to the above address.

We have lived in our retirement flat in Gibson Ct. for nearly ten years. During that time our entrances and grannets have been

littered with beer bottles, cans and spirit bottles. We have had drunks, vomit, plus people urinating in our entrances. All of which has been very frightening for us when going out and returning during the day & evening.

We would respectfully ask you not to allow J. & B. Convenience store to add to our present problems.

Sincerely,

A. J. Kiwan (A. J. Kiwan)

J. N. Kiwan (J. N. Kiwan (Mrs))

19th. Oct. 2011

Flat 28, Gibson Court
Regent Ave. RM1.1PF

Mr. Campbell.

Dear Sir.

Re: Licence Application for 182. South Street
as stated in your letter dated 22nd Sept 2011
This shop is located next to the front gates
of the retirement apartments which is
home to myself and about sixty other
residents. We feel that if the licences which
are requested is granted it will severely
reduce our safety and peaceful way of
life by increasing Crime, Disorder and
Public Nuisance, while reducing
Public Safety. The gateway to our gardens
is situated under an archway which
lies several feet from the roadway
providing the perfect place for groups
to gather to drink and use for a
public toilet. I sincerely urge you not
to grant this licence.

Yours faithfully. J.F. Morgan (Mrs)



2 GIBSON COURT
REGARTH AVENUE
ROMFORD - RM11 1AJ

13/10/11

Dear Sir,

I was astounded to receive your notice of application for an alcohol licence for an intended store right next to our retirement flats containing fragile, disabled & easily frightened residents.

In this particular area have enough disturbance from drinkers. Beer cans and bottles appear in our gardens which could not be possibly blown in by the wind.

Our South Street entrance is set back from the pavement & it was found necessary to have a security light fitted after residents were frightened by drinkers using the area.

I feel, as do other residents,

that the situation will be exacerbated by adding another alcohol outlet right next door.

There are already three convenience stores selling alcohol within 200 yards of the proposed shop apart from licensed restaurants.

The government is increasingly concerned over Britain's drinking problems & it seems madness to add to them.

There are too many sources of alcohol in Romford, I think this application should be refused.

Yours faithfully

R M Smith

Mrs. Ruth Askeith,
43, Gibson Court,
Regent Ave.
Romford.
RM1 1AJ.

19/10/11

Dear Mr. Campbell,

Re. Premises Licensing Application J+B Convenience Store,
182, South Street, Romford, RM1 1TR.

With reference to your letter dated 22/10/11 regarding
the above Premises Licensing Application.

I object to the application on three of the four
objectives in your letter:-

1. Public Safety,
2. Prevention of Public
3. Prevention of Crime + Disorder / Nuisance.

This shop is immediately adjacent to Gibson Court
and would cause many problems for all
of the elderly people living here.

Many of our residents are most concerned
over this and I would urge you not to
grant this license

Yours faithfully
Ruth Askeith (Mrs)

10-10-11



Mrs. T. Pritchard
298, Collier Row Lane
Romford
ESSEX RM5 3NL.

Dear Sirs

RE: JT B CONVENIENCE STORE
182, South Street, Romford, RM1 1TR

I am writing on behalf of my mother, Mrs. Kathleen McMonagle, who is an 80yr old lady and a resident of Gibson Court Romford, which is a retirement complex, where the majority of the residents are between 70 and 90yrs of age, and is situated in the same block as the above premises.

My Mother and a great number of her neighbours are extremely worried with regards to the above property being granted a licence to sell alcohol, as the entrance to their homes is directly next to the entrance of the said premises. These old Age Pensioners already feel vulnerable and afraid walking in and out of their homes due to the close proximity to Romford Station and all the premises that are already selling alcohol.

Granting a licence to this convenience store to sell alcohol will only make

P.T.O

on already bad situation much worse
and create even more crime and disorder
in this already volatile area.

Surely the ~~last~~ last thing that is needed
in the area is more anti social
behaviour, and granting this alcohol
licence on the doorstep of these
old Age Pensioners, is really not
the thing to be doing.

yours sincerely.

Teresa Pritchard

17th October 2011

I telephoned and spoke to Mrs Teresa Pritchard today she informed me that her mother who lives at 23 Gibson Court is unable to express herself in writing because of her age and has asked her to write an objection for her.

She told me that the concerns expressed in the representation are those of her mother

Therefore I have accepted the representation as valid.

Paul Campbell
Licensing Officer



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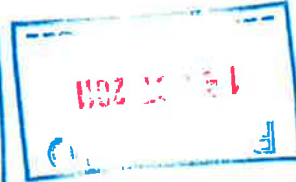
visit www.kslthomasinsurance.com for more details

Tel: 0845 4565640 / 01708 762950 / 01708 762945 / 01708 743688 Fax: 01708 750239

Office Hours: Monday-Friday 9.00-5.30pm Saturday 9.00-12.00 noon

13 October 2011

FAO Paul Campbell
London Borough of Havering
The Housing & Public Protection Office
5th Floor
Mercury House
Mercury Gardens
Romford
RM1 3SL




Dear Mr Campbell

I am writing this letter to object to a licence application that C S Jacks, J & B Convenience Store, 182 South Street, Romford, RM1 1TR has applied for.

My business is opposite these premises and not only is the area saturated with these grocery shops selling alcohol, I feel that another shop of this type would not only be a public nuisance to the retirement complex, Gibson Court and other surrounding homes and businesses, it could also increase Crime and Disorder at our end of South Street.

Furthermore the car park to the rear of our premises is regularly used by late night revellers using it as a place to drink, eat and relieve themselves. Our premises have also suffered vandalism and a further retail outlet of this nature would surely make matters worse for all at this end of South Street.

Yours faithfully



Mr R Thomas



Mr & Mrs A. Waddingham
30 Gibson Court
Regarh Avenue
Romford
RM1 1AJ

Dear Mr. Campbell
I will write
my objectives, after I have
made my comments.

My husband and
I. 79 & 80 years old, bought
a flat for safety having
a convenience store with an
alcohol permit 6 AM. 12 PM next
door to our flats is not good.

We have H. stores
all selling alcohol very near we
do not need another one.

Public safety

" nuisance.

crime & disorder.

I do hope you will take notice.

Yours sincerely

A. Waddingham

19-10-2011

MR & MRS WATSON
19 GIBSON COURT
ROMFORD
RM1 1AJ

Dear Mr Campbell,

Re premises application
J & B Convenience Store 182 South St. Romford.

I would like to object to the application on three objectives in your letter

THE PREVENTION OF CRIME AND DISORDER
THE PREVENTION OF PUBLIC NUISANCE
PUBLIC SAFETY

The shop is located in the block forming the front of our Elderly persons complex and is next to the gates of our communal gardens. The gates are under an arch and gives a perfect hide-away for youths and young people to congregate whilst drinking the alcohol purchased from the store

Licensing Sub-Committee

Appendix 4 - **Representations from Responsible Authorities**



METROPOLITAN
POLICE

Working together for a safer London

**The Licensing Authority
London Borough of Havering
Mercury House, Mercury Gardens,
Romford, Essex
RM1 3SL**

Your Reference:

Our Reference:

**Dave Leonard PC231KD
Romford Police Station
19 Main Road
Romford,
Essex
RM1 3BJ**

Telephone: 01708 432781

Fax: 01708 432554

Email:

haveringpolice@met.police.uk

Dave.Leonard@met.police.uk

Date: 18th October 2011

Dear Sir,

Re- Application For A New Premises Licence
J&B Convenience Store, 182 South Street, Romford RM1 1TR

With reference to the above, the Police *wish to make representation* against the application received on 26th September 2011 for a new premises licence registered by CS JACKS LTD.

The police make representation to this as the applicant has not satisfactorily addressed the steps he intends to take to promote the four licensing objectives particularly when addressing the prevention of crime & disorder and the protection of children from harm. This in turn is likely to lead to further public nuisance and public safety issues arising.

Owing to the significant number of licensed premises already operating within the ring road of Romford town centre it has been identified by the Local Authority as subject of a saturation policy. This, in turn, leads to a further concern that an increase in off-licensed premises in a condensed area has the potential to encourage irresponsible drinks promotions and pricings in order for businesses to remain competitive. I have now had the opportunity to discuss this application with Mr Joseph Jackson Cole and have advised him of the Police concerns and of their intention to make a representation. Mr Cole indicated to me that he has no previous experience of running an off-licence and when asked what percentage of store coverage would be dedicated to alcohol products he stated that it would amount to no more than 5%. I would be very surprised if that was the case. Mr Cole did inform me that there will be shutters installed to safeguard the alcohol products out of hours. However, Mr Cole admitted that he was not from the area and did suggest that he and his partner may be flexible towards revised opening hours. Mr Cole stated that there will be at least two members of staff working at all times *in addition* to himself or his business partner who, incidentally, is not currently a personal licence holder but is, apparently, in the process of applying for one.

This application is by no means the poorest I have received and the applicant's agent addresses a number of steps that he will undertake to address the promotion of the four licensing objectives. However, a professional template application package being produced does not always reflect the actual reality of the application in question nor does it guarantee the capabilities of their client. Many of the proposals made by the applicant to promote the licensing objectives require further clarification. For example, undertakings given relating to CCTV systems can be meaningless if not applied to guidelines that are capable of withstanding scrutiny. This template does not address the staffing levels nor, indeed, their competency at a venue that has declared an intention to remain open 24hrs a day. Whilst the hours for licensable activity being asked for are limited to 12 midnight, there is no written mention of what measures are being taken to make it clear to the customer that alcohol is not for sale between 0000hrs-0600hrs.

The premises are close to the very hectic transport infrastructure in and around Romford Railway Station and its bus terminus. During the weekdays the vicinity is highly populated with children commuting to and from school throughout Havering and beyond. This automatically lends the premises to being a potential source for young people to obtain alcohol. It is imperative that robust measures are taken to ensure the responsible supply of *all* age restricted products in this vicinity. Experience has shown that the off-licensed premises that struggle to comply with promoting the four licensing objectives in Havering are often those staffed with untrained or incompetent people who have little or no knowledge or understanding of their responsibilities to the local community. An assurance by the applicant to ensure that at least one personal licence holder is working on the premises at all times that alcohol is on display for sale may allay some of the concerns raised by this application.

The Romford Town Centre team, the Safer Neighbourhood Ward Teams and the Safer Transport Team are regularly tasked to deal with anti-social behaviour and disorder issues arising from irresponsible and/or excessive alcohol consumption, particularly during the evening hours. It must be pointed out that the current trends don't necessarily always point to irresponsible sales. There is just as much concern that they are obtaining alcohol by ulterior means, be it by theft or by proxy sales made by irresponsible adults or older looking group members.

Havering Borough Council has already identified Romford town centre as a crime 'hot spot' area and made it subject to an order being satisfied that;

(a) Nuisance or annoyance to members of the public or a section of the public; or

(b) disorder;

has been associated with the consumption of [alcohol]¹ in that place.

It is a Designated Public Place under s.13(2) of the Criminal Justice & Police Act 2001.

This creates powers for Police to deal with possession of and drinking alcohol within the area. It also makes it an offence to fail to hand over alcohol to a police officer when so required.

There is considerable local concern surrounding the levels of crime and disorder in this area. The Romford Town Centre Safe & Sound Group partnership including the Metropolitan Police, Havering Council, and local businesses is working to tackle these problems. This premises is situated within close proximity of the Romford Station transport hub and a number of late-night refreshment outlets.

• **The Prevention of crime and disorder.**

Havering Council has made Romford town centre a Designated Public Place to deal with disorder that is linked to the consumption of alcohol. The grant of another Premises Licence authorising the sale of alcohol for consumption off the premises has the potential to worsen the situation. Many assaults and offences of criminal damage are generally linked to alcohol and the existing licensed premises have significant levels of reported crime. However, referring to crime figures in this instance would not necessarily reflect reliably because many of the public disorder incidents that occur on a weekly basis in and around this area very often go unreported. That is an entirely different scenario from saying nothing happens. *Having said that, the police accept that no current alcohol related disorder is attributable to this venue but we must also point out that it is not currently open or trading.*

• **The Prevention of Public Nuisance**

Disturbance calls to police are at significant levels in this locality and an additional alcohol outlet has the potential to add to this problem, particularly one where the operator has not identified sufficient, clear steps to support the Licensing Objectives. Irrespective of the *licensable* hours being applied for, I would expect any sincere applicant who intends to remain open for twenty-four hours on a daily basis to offer a practical and acceptable operating schedule that takes into account the effect his business will have on those residing in the immediate proximity. After all, the applicant is proposing to operate as a *convenience* store.

• **The Protection of Children from Harm**

The premises are close to the very hectic transport infrastructure in and around Romford Railway Station and its bus terminus. During the weekdays the vicinity is highly populated with children commuting to and from school throughout Havering and beyond. This automatically lends the premises

to being a potential source for young people to obtain alcohol. It is imperative that robust measures are taken to ensure the responsible supply of *all* age restricted products in this vicinity. Experience has shown that the off-licensed premises that struggle to comply with promoting the four licensing objectives in Havering are often those staffed with untrained or incompetent people who have little or no knowledge or understanding of their responsibilities to the local community. An assurance by the applicant to ensure that at least one personal licence holder is working on the premises at all times that alcohol is on display for sale may allay some of the concerns raised by this application.

- **Public Safety**

Many residents, businesses and visitors to the area have the perception that Romford town centre is subject to a significant level of crime & disorder. When combined with the existing licensed premises, this licence, if granted, has the potential to have a *negative cumulative impact* on Public Safety.

Observations and Recommendations

The police cannot support the application for another premise to supply alcohol in South Street.

The Police respectfully request that the Licensing Sub-Committee refuse this application. We draw attention to its own 'Statement of Licensing Policy 2010' with reference to the 'Saturation Policy for Romford within the ring road'

Licensing Policy 018

It is the LLA's policy to refuse applications in Romford within the ring road for pubs and bars, late night refreshment premises offering hot food and drink to take away, off licences and premises offering facilities for music and dancing other than applications to vary hours with the regard to licensing policy 012

- 4.12 The Council acting as Licensing Authority is applying special policies relating to cumulative impact as outlined in revised DCMS guidance (paragraphs 13.2-13.39). These areas have been identified as under stress because of the cumulative effect of the concentration of licensed premises which has led to serious problems of disorder and/or public nuisance affecting residents, visitors and other businesses. The evidence for this is set out in Appendix 7 and 8
- 4.13 The LLA will apply these policies flexibly. It will always consider individual circumstances of each application, even where an application is made for a proposal that is contrary these policies.
- 4.14 It is not possible to give a full list of examples of when the council may treat an application as an exception. However, in considering whether a particular case is exceptional, the LA will consider the reasons underlying the Stress area special policies on cumulative impact.
- 4.15 The LLA will not consider a case to be exceptional merely on the grounds that the premises have been or will be operated within the terms of the conditions on the licence, or that are or will be generally well managed. This is expected in the conduct of all licensed premises.

It is my concern that this geographical location in the 'hot-spot' of Havering is wholly unsuitable to supply alcohol in an off-premises capacity. The greater percentage of incidents of disorder, or potential disorder, during the night time entertainment period tend to emanate in and around the vicinity of the bus terminal to the south of Romford Station. This area is the natural gathering point towards the end of the evening's activities because of its accessibility to the transport and fast food takeaway venues.

It must be pointed out that no off-licensed premises in Romford remains open for twenty-four hours and I suggest that is for very good reason. Sainsbury's in the Brewery has a licence until midnight but shuts at 10pm as does Asda, despite having a 24hr licence. People using the Town centre into the early hours of the morning go to eat and/or drink and/or be entertained. They do not go to shop. These popular superstores recognize this and do not choose to open up to those persons leaving the pubs and clubs. One has to ask the question what kind of customer base will the applicant be serving to into the early hours of the morning? There is ample access to alcohol in the pubs and clubs in town into the early hours. It is my concern that this venue will become the port of call to those who have been refused entry elsewhere or, perhaps, have even been ejected from licensed premises.

New research commissioned by *ALCOHOL CONCERN* (please see attached) shows a positive link between the density of off-licensed premises and harm from alcohol in underage drinkers.

The study *ONE ON EVERY CORNER* finds that, excluding London, on average a 2:1 relationship exists between the number off-licences per 100,000 of population and hospital admissions by underage drinkers for alcohol specific admissions such as alcohol poisoning or intoxication. For every two off-licences per 100,000 of population there was one under-18 year old per 100,000 of population being admitted to hospital due to drinking according to the analysis, meaning that on average in areas with a higher concentration of off-licences, there are higher numbers of young people going to hospital as a result of drinking.

The findings also suggest that nearly 10% of all alcohol specific hospital admissions for under-18s in England, excluding London, are directly attributable to the concentration of off-licences in a local area. Of the 19,367 children and young people admitted to hospital for alcohol specific reasons between 2006 and 2009, over 1,900 of these admissions could therefore be directly attributable to the number of off-licenses in the young persons area.

In 2009 there were over 49,000 off-licensed premises in England and Wales - an increase of more than 25% over the past 30 years. Off-licence sales are the predominant direct and indirect source of access to alcohol for young people under 18 years old. The report states that the general availability of alcohol through greater number of off-licences may increase the volume of alcohol in the home, as well as friends' access to alcohol. This also increases the number of opportunities for under-18s to 'shoulder-tap', asking someone else to buy alcohol for them outside retail outlets as well as direct underage purchase by minors. This ultimately translates into increased drinking and harms.

The report argues that Government needs to introduce measures that reduce the general availability of alcohol by controlling off licence density and warns that simply relying on better enforcement of existing regulation banning the sale of alcohol to minors may not therefore be enough protection. Although in England councils can set up 'saturation zones' in local areas to restrict new licenses, licensees can appeal. There is currently no public health objective on licensing in England, while there is in Scotland.

Alcohol Concern Chief Executive, Don Shenker said:

"It is a sobering thought that the numbers of off-licences in any one area has an impact on under-18s drinking and ending up in hospital. It is a failing of the current system that so many licences are being granted without due consideration to young people's health."

"Local licensing committees are currently operating with one arm tied behind their backs. Current licensing legislation does not give licensing committees enough power to restrict high density of licensed premises. A new health objective should be included in the Licensing Act to enable local authorities to refuse new licenses in order reduce alcohol-related harm and protect young people."

In its current format, the Police ask that the Licensing Committee refuse to grant a premises licence. It is our contention that this application is not exceptional in accordance with the London Borough of Havering's 'Statement of Licensing Policy 2010' relating to a saturation policy. However, if following a compelling and exceptional presentation by the applicant, the Licensing Committee are minded to grant a licence, the police would ask that further consideration is given to attaching the following recommendations, taken from the guidelines set by the London Borough of Havering 'Statement of Licensing Policy 2010 Pool of Conditions' (below) to ensure that a minimum standard of expectation is robustly adhered to.

CD1 All staff shall be suitably trained for their job function for the premise. The training shall be written into a programme, ongoing and under constant review, and must be available to a relevant Responsible Authority when called upon.

We ask that a personal licence holder is on the premises at all times that alcohol is on display for sale.

Protection of Children from Harm.

Proof of Age

All operators and staff have both a duty and responsibility to ensure that only those who are of age are provided with intoxicants.

CDGPG3 Prominent clear notices shall be displayed at the point of entry to the premises and in a suitable location at any points of sale, advising customers that they may be asked to produce evidence of their age.

CDGPG11 All members of staff at the premises shall seek "credible photographic proof of age evidence" from any person who appears to be under the age of 18 years and who is seeking to purchase alcohol. Such credible evidence, which shall include a photograph of the customer, will include a passport, photographic driving licence, or Proof of Age card carrying a "PASS" logo.

CDGPG12 All occasions when persons have been refused service shall be recorded in writing and kept at the premises for six months.

CDGPG13 Prominent, clear notices shall be displayed at the premises about the supply of alcohol to minors and the relevant offences involved.

THE POLICE ARE ENCOURAGED TO SEE THAT THE APPLICANT WILL OPERATE A CHALLENGE 25 SCHEME. A STRICT ID PROTOCOL IS VERY NECESSARY IN THIS INSTANCE. A REFUSALS REGISTER SHOULD BE KEPT AND DETAILS OF PERSONS REFUSED THE SALE OF INTOXICATING LIQUOR ENTERED IN AN INCIDENT LOG. DETAILS TO INCLUDE DATE & TIME, DESCRIPTION & APPARENT AGE OF PERSON REFUSED AND SALE REFUSED.

CCTV

The presence of a properly specified and fully operational CCTV system can make an important contribution towards public safety and the prevention of crime. It will also assist in the investigation and identification of those involved should an incident occur immediately outside or inside licensed premises. Conditions may not just require CCTV on the premises, but also specify the precise location of each camera, the requirement to maintain all equipment in working order, retain a System File and to secure recordings for an appropriate period of time.

An 'Operational Requirement' (OR) should be drawn up for each CCTV system to ensure that it is fit for purpose. Advice on how to complete an 'OR' can be found in the Home office Scientific Development Branch (HOSDB) publication 55/06 'CCTV Operational Requirements Manual'. The Havering Police Crime Prevention Office will provide individuals conducting risk assessments when preparing operating schedules with advice relevant to current standards. At the time of publication these are provided for in the HOSDB publication 09/05 'UK Police Requirements for Digital CCTV Systems.

CD16 ***A properly specified and fully operational CCTV system shall be installed or the existing system maintained to a satisfactory standard. The system will incorporate a camera covering each of the entrance doors and be capable of providing an image which is regarded as 'identification standard' of all persons entering and/or leaving the premises. All other areas of risk identified in the Operational Requirement shall have coverage appropriate to the risk.***

CD17 ***The installation or upgrading of any CCTV system shall comply with current best practice. In addition the documentation listed below shall be included in a 'System File' which is readily available for inspection by the relevant authority;***
Site plan showing position of cameras and their field of view.
Code of Practice.
Performance specification e.g. storage capacity, image file size, IPS for each camera and purpose of each camera position
Operational requirement.
Incident log.
Maintenance records including weekly visual checks.

- CD18** *To obtain a clear head and shoulders image of every person entering the premises on the CCTV system, persons entering the premises should be asked to remove headwear, unless worn as part of religious observance.*
- CD19** *The CCTV system shall incorporate a recording facility and all recordings shall be securely stored for a minimum of one calendar month. A system shall be in place to maintain the quality of the recorded image and a complete audit trail maintained. The system will comply with other essential legislation, and all signs as required will be clearly displayed. The system will be maintained & fully operational throughout the hours that the premises are open for any licensable activity.*
- CD20** *The positions of all CCTV cameras shall be clearly shown on a set of plans which should form part of the 'System File'. Any alteration to the system should only be carried out after consultation with and written approval of Havering Police and the Licensing Authority.*
- CD21** *A staff member from the premises who can operate the CCTV system shall be on the premises at all times when the premises is open to the public. This staff member shall be able to show Police recent data or footage with the absolute minimum of delay when requested.*

The police accept that one must address the application, as required, on its individual merits but it is our contention that this application needs to be **exceptional** in order to justify the need for a saturation policy.

And, perhaps, this can only be resolved by presenting the application in its entirety before a Licensing Sub-Committee.

If I can be of any further assistance in this matter please do not hesitate to contact me in the Licensing Office at Mercury House on 01708 432781.

Yours sincerely,



Dave Leonard
Licensing Officer
Havering Borough Police

The Importance of Reducing the Availability & Supply of Alcohol to under 18s: The harmful consequences of young people's drinking

The underage consumption of alcohol not only affects the young person, it also has a huge impact on their families, relationships and the rest of society. As well as the increased health risks, other societal costs include poor school attendance and educational attainment, antisocial behaviour, violence and accidents. The London Borough of Havering is committed to ensuring that the whole community is aware that it is in all of our interests to take action to reduce the availability and harm that alcohol can cause among young people who drink.

1. Underage Drinking

Findings from Crime and Justice Survey (2004), 'Underage Drinking' indicates that the majority of underage drinkers who attempted to buy alcohol from licensed premises were successful (84%) and 14% had been successful more than 11 times. Among those aged 16–17 years, the figures were even higher with nearly all successfully purchasing from a shop (96%) or pub (98%) at least once. Of those 16 and 17-year-olds who had successfully purchased alcohol, many had purchased alcohol more than 11 times in bars and clubs and from shops (66% and 39%). Moreover, young people aged 16–24 years are significantly more likely than people in other age groups to consume more than twice the recommended sensible drinking limit.

2. Crime and antisocial behaviour

Underage drinking and drinking by young adults is perceived as a real problem by the public. Over half of those who reported witnessing drunken or rowdy behaviour said it was due to young people drinking in the streets and other public places. This public concern and anxiety is reinforced by the facts. Drinking among young people under the age of 18, especially frequent drinking, is associated with criminal and disorderly behaviour. Nearly half of all 10–17-year-olds who drink once a week or more admitted to some sort of criminal or disorderly behaviour: around two-fifths reported getting into an argument and about a fifth stated they had got into a fight during or after drinking. In addition, of the offences reported by young people under the age of 18, 37% were committed by those who drank once a week or more.

3. Education & Relationships

There are strong links between high levels of youth alcohol consumption and other risk-taking behaviours such as unprotected sex, illegal drug misuse, truancy and exclusion. For example, among 14–15-year olds, those who have drunk in the last month are more likely to engage in sexual activity. Moreover, young people are the group least likely to use a contraceptive or a condom or access sexual health advice thus putting them at higher risk of sexually transmitted infections or becoming pregnant (the UK has the highest rates of infections and under-18 conceptions in Europe). Furthermore, alcohol consumption can also have adverse effects on school performance, with drinking being seen to be both a result and a cause of school failure, truancy and exclusion.

4. Illness, Injuries & Hospital Admissions

Among young people who drink, those who report frequent binge drinking and frequent drinking are most likely to report injuries whilst under the influence of alcohol. Only a small proportion of those young people who drink alcohol are admitted to hospital, but the number of hospital admissions related to alcohol consumption has been increasing among young people in England in recent years. Deaths from liver cirrhosis have risen in the 25–34 age group and this is thought to be a consequence of increased drinking starting at an earlier age. People who go on to become dependent on alcohol in later life often start drinking before the age of 14.

References:

Safe. Sensible. Social: The Next Steps in the Alcohol Strategy, 2007, HO & DoH

Sex, Drugs, Alcohol and Young People: A review of the impact drugs and alcohol have on young people's sexual behaviour, 2007, Independent Advisory Group on Sexual Health & HIV

Daren Mulley, DAAT, 25.04.08

One on every corner

The relationship between off-licence density and alcohol harms in young people



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Alcohol Concern
Making Sense of Alcohol

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The impact of alcohol availability on children and young people

England is a country that increasingly chooses to drink at home. This is due, at least in part, to the difference in price between alcohol bought from on and off-licensed premises. Over the past 30 years there has been more than a 25% increase in the number of off-licensed premises, such as convenience stores and supermarkets that sell alcohol for consumption elsewhere¹. Off-licensed sales are the predominant direct and indirect source of access to alcohol for young people under-18-years-old² and growing international evidence links off-licence density with various negative alcohol-related consequences^{3 4 5}.

Alcohol Concern's Youth Policy project commissioned Dr Nikki Coghill, Senior Research Fellow at the University of the West of England, to conduct some statistical analysis into the density of off-licensed premises and alcohol harms in young people in selected areas of England. As far as we are aware, this is the first study of its kind in this country to

focus on the links between off-licence density and harms in under-18s. The analysis uncovered a moderate but statistically significant relationship between the density of off-licensed premises and alcohol specific hospital admissions in young people under-18-years-old per 100,000 of population. Our findings suggest that the greater the availability of alcohol, the greater the risk of young people suffering alcohol harm. Therefore, the changing nature of where we buy and consume alcohol may have an impact on the risk of harms to young people. Limitations in the recording of alcohol-related conditions in hospitals and A&E departments means that the results from this study are likely to be an under-representation of the true picture of harms impacting on young people. Effective harm prevention therefore not only requires targeting education, information and support at an individual level among young people, but control of the concentration of alcohol outlets at a community level.

Our findings suggest that the greater the availability of alcohol, the greater the risk of young people suffering alcohol harm. Therefore, the changing nature of where we buy and consume alcohol may have an impact on the risk of harms to young people.

The impact of alcohol availability on children and young people

Key findings

Statistical analysis was undertaken of the alcohol specific hospital admissions data for persons under-18-years-old per 100,000 of population (a national alcohol indicator) and the density of off-licensed premises by local authority per 100,000 of population. Off-licence density was calculated using off-sales licensing data and Office of National Statistics population estimates. In England, excluding London, there was a moderate but statistically significant relationship between the number of off-licensed premises and underage alcohol specific admissions to hospital. No statistical relationship between off-licence density and harms in young people was found in data from the London boroughs resulting in their exclusion from the findings. This anomaly is likely to be because young people in London consistently consume less alcohol than the average in England and with a lower frequency⁶.

The analysis showed that nearly 10% of all alcohol specific hospital admissions in England, excluding London, are directly

attributable to off-licence density; meaning availability rather than any other external factor is the cause of one in ten of such harms. In England, excluding London, between 2006 and 2009, 19,367 children and young people under-18-years-old were admitted to hospital with alcohol specific conditions⁷. Our research indicates that over 1900 of those admissions could be directly attributable solely to the density of off-licensed premises in the young person's local area.

Further analysis using linear regression modelling found that nationally on average every two extra off-licences per 100,000 of population results in one alcohol specific hospital admission of a person under-18-years-old per 100,000 of population. In general, as the density of off-licences in an area increases, so do alcohol specific admissions in young people. There is, however, variation by region. Table 1 is a selection of areas with some of the highest and lowest levels of off-licence density.

In general, as the density of off-licences in an area increases, so do alcohol specific [hospital] admissions in young people.

Methodological qualification

This study does not set out to establish cause and effect, rather it aims to highlight, for the first time in England, the positive relationship between density of off-licensed premises and harm amongst under-18s; a cohort supposedly protected by existing alcohol licensing regulation. The study does not take into account on-trade density because evidence suggests licensed premises such as pubs are less likely avenues of alcohol access for underage drinkers than off-licensed premises⁸. The study assumes a consistent average of young people per 100,000 of population across all areas and is not adjusted for variance.

Please note this is not a complete picture; comparable density and harms data (where we were able to match licensing authority with local health authority boundaries) was only available for 214 of the 293 English authorities - excluding London - that published alcohol indicator data in the Local Alcohol Profiles for England (LAPE). Representing almost three-quarters (73%) of the total areas published for England this is a figure sufficiently robust to draw strong conclusions.

Limitations in recording alcohol harm

This relationship needs to be interpreted in light of the fact that it is based only on alcohol specific* harms, such as alcohol poisoning, and excludes conditions related to alcohol** such as head injuries or sprains resulting from alcohol-related assaults or falls, or attendances that are dealt with only at A&E. In addition, hospital admissions that are specific to alcohol consumption may not necessarily be recorded as such. They are often only recorded according to the treatment provided and not the cause of the event. Weaknesses in the recording of the causes of admission in hospital settings mean that the relationship between off-licence density and harm is likely to be stronger than our available data demonstrated. Importantly, this study did not attempt to calculate the numerous other negative consequences associated with alcohol such as crime, violence or traffic accidents.

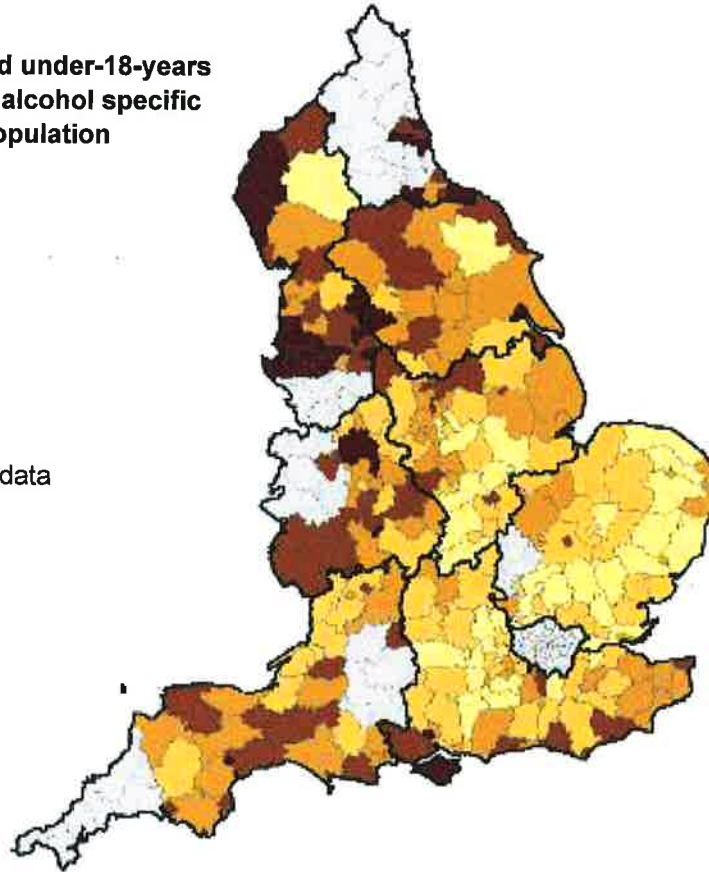
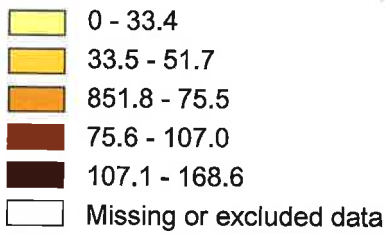
Table 1: A selection of areas with the some of the highest and lowest off-licence density and harms in young people compared with the average for England

Local Authority	Off-licence density [†]	Alcohol specific under-18s hospital admissions [‡]
Salford	135.5	117.0
Lincoln	116.4	107.0
Gateshead	114.3	114.8
England average	62.9	79.4
Tunbridge Wells	48.3	48.4
Swale	35.6	57.7
Malvern Hills	26.7	82.4

[†] Per 100,000 population [2009]

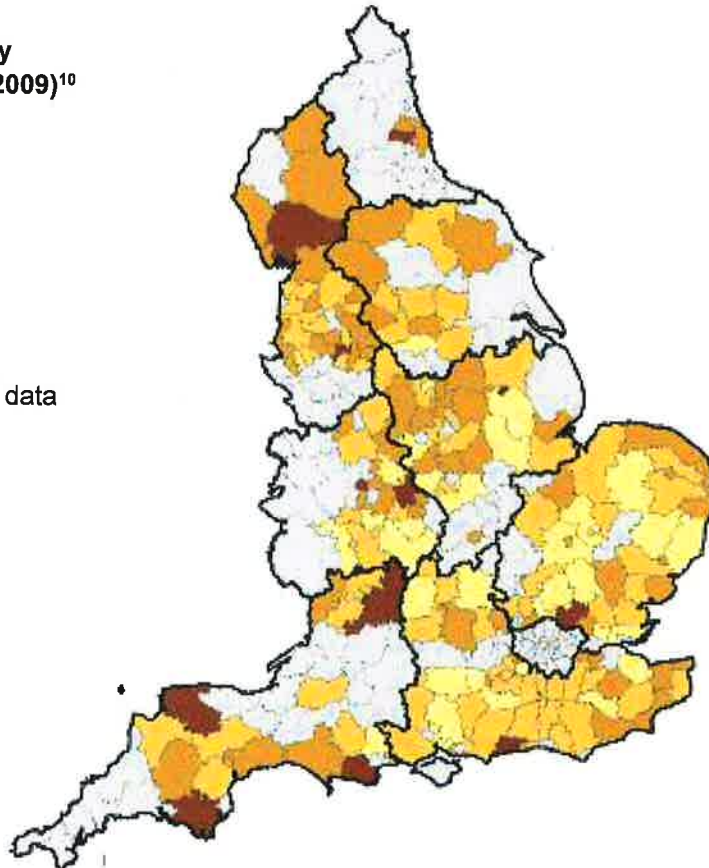
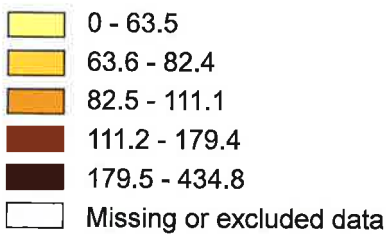
[‡] Crude Rate per 100,000 population [2006/07 to 2008/09]

Map 1: Young people aged under-18-years admitted to hospital with alcohol specific conditions per 100,000 population (2006/07 to 2008/09)⁹



Map Boundaries: Crown Copyright

Map 2: Off-licence density per 100,000 population (2009)¹⁰



Map Boundaries: Crown Copyright

At a local level

By way of illustration, the following tables provide a more detailed breakdown of data for selected local authorities in greater Manchester with high off-licence density and high levels of alcohol harm in young people. Table 2 shows off-licence density and young people's alcohol specific admissions in Salford, Tameside and Wigan respectively compared with the national average.

Table 2: Off-licence density per 100,000 of population and alcohol specific admissions of persons under-18-years per 100,000 of population

Local Authority	Off-licence density	Alcohol specific under-18s hospital admissions
Salford	135.5	117.0
Tameside	98.0	123.4
Wigan	88.7	121.4
England average	62.9	79.4

Levels of consumption

Significant numbers of young people regularly drink in all three local authorities increasing the risk of other alcohol-related negative consequences (see Table 3).

Table 3: Frequency of alcohol consumption amongst 14 to 17 year olds (2009)¹¹

Local Authority	Drinking twice a week or more (%)	Drinking once a week (%)	Drinking 1-3 times a month (%)	Drinking less than once a month (%)	Never drink (%)
Salford	17	21	20	25	17
Tameside	19	19	23	21	18
Wigan	18	21	24	23	14

Associated risks

There are a range of associated risks related to excessive alcohol consumption. In particular there are a number of possible links between teenage conception and alcohol consumption¹². Table 4 shows that the rate of teenage conceptions in Salford, Tameside and Wigan (59, 60 and 50 per 1000 of population respectively) is well above the national average (40 per 1000).

Table 4: Rate of conceptions amongst 15 -17 year olds per 1000 of the population (2004 – 2008)¹³

Local authority	2004	2005	2006	2007	2008
Salford	57	61	59	62	59
Tameside	54	60	54	55	60
Wigan	51	59	53	54	50
England average	42	41	41	42	40

Growth in off-licence trade

Over recent years there has been a shift towards drinking at home that has contributed to the falling number of pub-goers. This is explained, at least in part, by the disparity in price between on and off-licensed trade; alcohol bought from off-licences now costs on average around one third of the cost of alcohol bought from pubs and other on-trade premises¹⁴. In the UK, sales from off-licensed premises now account for nearly 50% of all alcohol consumption¹⁵. Since 1992, the volume of alcoholic drinks brought into the home in the UK has increased from 527ml per person per week to 706 ml in 2008 whilst the amount of alcohol sold by the on-trade has dropped by 40 per cent between 2001 and 2008¹⁶. In England and Wales the number of off-licensed premises has risen significantly over the last 40 years¹⁷ fuelled by the expansion of supermarket premises. (See table 5). Greater numbers of off-licensed premises lead to an increasingly competitive alcohol market-place resulting in still lower prices. In these circumstances an increase in consumption, and therefore alcohol harms, would be expected¹⁸.

Greater off-licence density may increase the volume of alcohol in the home, as well as friends' and family's access to alcohol and the number of opportunities for shoulder-tapping. These ultimately translate into increased harms...

How young people access alcohol

For young people under-18, greater off-licence density does not necessarily translate into increased opportunity for the direct purchase of alcohol. Rather, greater off-licence density increases the general availability of alcohol in the home and through friends, family and from passers-by – through what is known as 'shoulder-tapping' outside alcohol retail outlets. In fact the proportion of young people who regularly bought alcohol from an off-licence has declined since 1996, from 27% to 15% in 2008. However, this is matched by an increase in the proportion who said they usually bought it from a friend or relative, from 9% in 1998 to 24% in 2008¹⁹. Stricter enforcement and implementation of laws banning the sale of alcohol to minors does not necessarily reduce the access or availability of alcohol to young people. Research shows that the most common ways for young people aged 11-15 years to access alcohol were being given it by friends (24% of those surveyed) or parents (22%); asking someone else to buy alcohol (18%); or taking alcohol from home with permission (14%). For older pupils surveyed, home was still an important source of alcohol – 36% of 15 year olds had been given alcohol by parents and 25% had taken it from home – but they were much more likely to have obtained it from friends (50%) or to have asked someone else to buy it for them (41%) than younger pupils²⁰. Greater off-licence density may increase the volume of alcohol in the home, as well as friends' and family's access to alcohol and the number of opportunities for shoulder-tapping. These ultimately translate into increased harms including alcohol specific hospital admissions. Thus rigorous enforcement of the Licensing Act which bans the sale of alcohol to minors may only have a limited impact on the general access and availability of alcohol to young people.

Growing evidence

A growing body of international evidence underlines the risks associated with greater off-licence density for both young people and young adults. In the US, alcohol outlet density has been significantly linked to the initial likelihood and frequency of obtaining alcohol through various sources including retail outlets, shoulder-tapping, home or family members²¹. In New Zealand, increased off-licence density has been linked to the quantities of alcohol consumed by teenage drinkers²². Other studies indicate that greater regulation of alcohol outlet density may be a useful public health tool for reducing consumption and related harms²³. Alcohol Concern's Youth Policy project findings highlight the clear need for further culturally relevant research in England that explores the relationship between off-licence density and harm in young people and feeds into harm-reducing public health strategies.

Lacking the powers to sufficiently control licence density

Current licensing legislation obliges licensing committees to approve all new licence applications and extensions unless particular concerns about possible contravention of licensing objectives have been raised. There is no licensing objective in England and Wales to protect public health. In practice, this means that there is little licensing committees can do to circumvent a high density of licensed premises. Although local authorities can introduce saturation policies to prevent further licences being granted in high-density areas, this is not statutory and decisions to decline new licences can be overturned on appeal.

there is little licensing committees can do to circumvent a high density of licensed premises

Table 5: Off-licensed premises including supermarkets in England and Wales²⁴

	1910	1930	1950	1970	1989	2009
Number of off-licensed premises	24,438	22,166	23,532	27,910	45,507	49,074

Conclusion and recommendations

Conclusion

Demonstration of the positive relationship between off-licence density and harms in underage drinkers in England, excluding London, suggests that the current availability of alcohol shapes the risk a young person faces as they grow up. One in ten alcohol specific hospital admissions - such as alcohol poisoning - may be attributable to the density of off-licensed premises locally. Unfortunately, the narrowness of alcohol specific hospital admission codes means this is likely to be a considerable under-representation of underage harm. More accurate and consistent recording of alcohol-related conditions in hospitals and A&E departments would reveal a truer picture of the relationship between harms and off-licence density. These findings suggest that there may be consequences to the changing patterns of where we buy and consume alcohol: increasingly in the home, which is a reflection of the growth in off-licensed premises.

Relying simply on better enforcement of regulation banning the sale of alcohol to minors may not therefore be enough protection as young people access alcohol through the home, friends and family. It is likely to be the greater general availability of alcohol, attributable to local off-licence density that has a direct impact on the risks of harm that a young person faces. Clearly more research is needed to better understand this correlation, but the challenge for government is how to respond to this in policy terms to protect young people.

Recommendations

- Government should fund further research into the relationship between alcohol harm in young people and alcohol outlet density. There is a clear need for culturally relevant research findings to feed into harm-reducing public health strategies.
- A new health objective should be included in the Licensing Act to enable local authorities to reduce alcohol-related harm. Health-harms data should always feed into licensing decision-making and licensing authorities must be given the power to proactively refuse new applications/extensions on the basis of local health considerations.
- Government should develop and introduce standard systems to more effectively measure and record the levels of alcohol-related harm for all patients in both accident and emergency departments and via hospital admissions. This will allow for improved analysis of alcohol-related harm.

Footnotes and references

- * A number of conditions are defined as wholly attributable to alcohol consumption. These conditions and their ICD-10 codes are as follows; Alcohol-induced pseudo-Cushing's syndrome (E24.4); Mental and behavioural disorders due to use of alcohol (F10; combines ICD 9 codes for alcoholic psychosis, alcohol dependence and alcohol abuse); Degeneration of nervous system due to alcohol (G31.2); Alcoholic polyneuropathy (G62.1); Alcoholic myopathy (G72.1); Alcoholic cardiomyopathy (I42.6); Alcoholic gastritis (K29.2); Alcoholic liver disease (K70); Chronic pancreatitis (alcohol induced) (K86.0); Ethanol/methanol poisoning (T51.0, T51.1); Toxic effect of alcohol, unspecified (T51.9); Accidental poisoning by and exposure to alcohol (X45)
- ** Each alcohol-related admission is assigned an attributable fraction that represents the proportion of admissions that can be attributed to alcohol and is based on a review of the available research. These conditions and their ICD-10 codes are as follows; E24.4 Alcohol-induced pseudo-Cushing's Syndrome; I47-I48 Cardiac arrhythmias; F10 Mental and behavioural disorders due to use of alcohol; I60-I62, I69.0-I69.2 Haemorrhagic stroke; G31.2 Degeneration of nervous system due to alcohol; I63-I66, I69.3, I69.4 Ischaemic stroke; G62.1 Alcoholic polyneuropathy; I85 Oesophageal varices; G72.1 Alcoholic myopathy; K22.6 Gastro-oesophageal laceration/haemorrhage syndrome; I42.6 Alcoholic cardiomyopathy; K73, K74 Chronic hepatitis, not elsewhere classified and Fibrosis and cirrhosis of liver; K29.2 Alcoholic gastritis; K85, K86.1 Acute and chronic pancreatitis; K70 Alcoholic liver disease; L40 excluding L40.5 Psoriasis; K86.0 Chronic pancreatitis (alcohol induced); O03 Spontaneous abortion; T51.0 Ethanol poisoning; V02-V04 (.1, .9), V06.1, V09.2, V09.3 Pedestrian traffic accidents; T51.1 Methanol poisoning § Road traffic accidents (driver/rider); T51.9 Toxic effect of alcohol, unspecified; V90-V94 Water transport accidents; X45 Accidental poisoning by and exposure to alcohol; V95-V97 Air/space transport accidents; C00-C14 Malignant neoplasm of lip, oral cavity and pharynx; W00-W19 Fall injuries; C15 Malignant neoplasm of oesophagus; W24-W31 Work/machine injuries; C18 Malignant neoplasm of colon; W32-W34 Firearm injuries; C20 Malignant neoplasm of rectum; W65-W74 Drowning; C22 Malignant neoplasm of liver and intrahepatic bile ducts; W78-W79 Inhalation of gastric contents/Inhalation and ingestion of food causing obstruction of the respiratory tract; C32 Malignant neoplasm of larynx; X00-X09 Fire injuries; C50 Malignant neoplasm of breast; X31 Accidental excessive cold; G40-G41 Epilepsy and Status epilepticus; X60-X84, Y10-Y33 Intentional self-harm/Event of undetermined intent; I10-I15 Hypertensive diseases X85-Y09 Assault

- 1 British Beer and Pub Association (2010) *Statistical Handbook*, Brewing Publications Limited, London
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One on every corner

The relationship between off-licence density
and alcohol harms in young people

Written by the Alcohol Concern Youth Policy Project,
funded by Comic Relief and the Tudor Trust

Acknowledgements

The Alcohol Concern Youth Policy project would like to gratefully
acknowledge the contribution of Dr Nikki Coghill, Senior Research
Fellow at the University of the West of England.

Alcohol Concern

Alcohol Concern is the national agency on alcohol misuse
campaigning for effective alcohol policy and improved services for
those people whose lives are affected by alcohol-related problems

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Published by

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