



Working together for a safer London

Licensing Authority
London borough of Havering
Mercury House, Mercury Gardens
Romford
RM1 3SL

PC 118 KD David Fern
Romford Police Station
19 Main Road
Romford,
Essex
RM1 3BJ

Telephone:01708 432781
Email:David-
anthony.fern@met.police.
uk
Date: 5th September 2012

Dear Sirs,

Police wish to make representation against the application for a new premises licence for Station lane Express, 89 Station Lane, Hornchurch RM12

The applicant has failed to state why this application is exceptional and why it should be considered within a saturation area. Police feel the applicant has not fully addressed the licensing objectives, the prevention of crime and disorder, public nuisance and protecting children from harm.

The premises falls within the saturation area of St Andrews ward, this area is highlighted as being under stress. An area under stress is caused by the cumulative effect of the concentration of licensed premises, there are now thirty three (33) such licensed premises with the capacity for off sales within the St Andrews Ward.

There are two (4) nearby off licences to this purposed store less then a five minute walk.

- Marmaris 181 High Street, Hornchurch.
- Barrels 144 Station lane Hornchurch.
- COSTCUTTER, 18A Station Lane, Hornchurch.
- Centre News 169 high Street, Hornchurch.

This is not by far the amount of stores located near the premises but simply a five minute walking radius of the purposed store.

This application is far from exceptional and does not provide anything different within the ward of St Andrews.

The plan enclosed in the application clearly shows the volume of alcohol the shop intends to sell. This amount of floor space dedicated to alcohol sales would not help the current situation of alcohol related violence and disorder within the St Andrews ward. It would appear from the plans that alcohol sales could well be the main driver in this stores profit. This would lead to disorder and anti social behaviour within close proximately of the premises.

The current lay out of the shop.



The hours requested in this application would also impact of the crime prevention and disorder aspect along with public nuisance. This ward suffers from pre loading issues associated with off licenses; where by subjects purchase cheap alcohol and drink it often in the street, prior to entering a licensed premises bar/club. So allowing another off license would certainly add to a cumulative impact within the zone. The night time economy appears to start earlier in the evening within this ward compared to other parts of the borough.

This store is also surrounded by residential premises including directly above the store. Premises that open late for licensable activity often attract anti social behaviour directly outside. This could be from drinking alcohol, groups congregating and proxy sales, whereby adults purchase alcohol for minors without realising they are committing offences.

Protecting children from harm: Hornchurch is particularly a concern to police for under age sales from off licences along with proxy sales. There are several schools and colleges within walking distance in the area. Children create problems at many bus stops in the day time from anti social behaviour along with attempting and obtaining alcohol. Police have worked closely with Havering councils trading standards officers whereby a series of test purchases operations have been conducted and the level of failure is above national average. It is vital that stores provide adequate training and invested in selling alcohol responsibly. I would purpose any store in this area should have a personal licence holder on the premises at all times. It's also important to maintain a clear view of the alcohol to prevent theft. We have also found that shops which operate a clear window policy, which allows staff to monitor the activity of children and youths outside the store, can often deter proxy sales. Police appreciate that often children look older and judgment of age can be difficult and, for this reason the police would like to see a challenge 25 policy adopted across the ward.

The prevention of crime and disorder: disorder generally comes from under age sales and the annoyance to the community of being asked to purchase items for young children outside the premises. Adults often do not understand the offences they are committing, thus creating crime and disorder. The younger generations are often unaware of how they are perceived under the influence of alcohol and, how their disorderly behaviour and conduct can often offend and create public nuisance. This is not exclusive to the younger generation many people under the influence of alcohol are totally unaware of how their behaviour is perceived by others. This ward over the last few years as certainly attracted a more anti social and disorderly crowd.

Off licences tend to offer cheaper alcohol and this was highlighted in the Prime Minister alcohol strategy report. There is strong link between price and consumption. Off licences tend to offer heavy discounts and drinks promotions, all which impact on excessive alcohol consumption. This creates further issues of crime and disorder along with public nuisance in the street and the surrounding area. Allowing these premises to be licensed police feel would impact on the licensing objective crime and disorder and add more problems to this area. This could be by simply allowing additional premises to be licensed slightly off the main street, creating a larger zone for disorder and fueling the intake and availability of alcohol.

Councilor Wood recently highlighted to me concerns by residents of urination in streets and a general deterioration of the public realm, I have also witnessed groups drinking and congregating in the streets with very little concern for others. This includes blocking pavements, shouting, behaving in an unruly manner and disorderly conduct. All of this can create no go areas for others and a feeling of intimidation. Police believe that a driver in this behaviour is alcohol and the availability of it.

My experiences of retailers in off licenses are that they over promise and generally under deliver. This could coincide with the higher failure rates in this borough of under age sales. They tend to be profit lead and not community lead, hence creating issues for the police, be it in the street or at home.

I have been to this shop and spoke to the applicant who appeared to have very little knowledge of the area and the associated problems, including the details of the saturation policy. The applicant did produce a refusal log although there were no entries in the log. The premise has been trading for approximately two months under its current ownership and as a convenience store.

Police could not support this application for the granting of a new licence to an area under stress. Police feel that granting such a licence would go against the licensing objectives mentioned in this report.

The crime figures recently presented at the Safe and sound partnership scheme show an increase in violent crime in the ward of St Andrews, serious wounding was up 225% 2011 - 2012. This indicates the levels of violence police are presented with and why the policy of saturation is still valid. There was an increase in both ABH and GBH towards the end of the reporting year 2011 - 2012.

A recent report shows that in London there was 156, 017 people admitted to hospital last year with drink problems compared with 146, 391 the year before. Experts warn that cheap alcohol is still to blame for people developing liver problems and drink related health problems.

If the committee is in support of the application against the Police representation, the police would seek to impose robust conditions and request a reduction in trading hours.

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. Refresher training should be every 6 months on the responsible sale of alcohol.

CD6 A Premises Daily Register shall be kept at the premise. This register will be maintained and kept for a minimum of 12 months. This register should record the name of the person responsible for the premise on each given day. The Premises Daily Register shall record all calls made to the premises where there is a complaint made by a resident or neighbour of noise, nuisance or anti social behaviour by persons attending or leaving the premises. This shall record the details of the caller, the time and date of the call and the time and date of the incident about which the call is made and any actions taken to deal with the call. The Premises Daily Register will be readily available for inspection by an authorised Person throughout the trading hours of the premise. The Premises Daily Register will also record all incidents in relation to the use of any force by staff, It shall record the time and date of the occurrence, name or brief description of the person removed, and details of the staff involved.

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 should be 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 and 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.

CDGPG3 A proof of age scheme, Challenge 25, shall be operated at the premises where the only acceptable forms of identification are recognised photographic identification card, such as a driving licence or passport.

CDGPG4 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.

CDGPG12 All occasions when persons have been refused service shall be recorded in writing and kept at the premises for 12 months.

Designated Premises supervisor, Premises licence holders and other members of their staff must keep a register detailing when alcohol and cigarettes have attempted to be purchased by someone suspected as being underage. This register should detail the person who refused the sale, the date and time and the product subject to the attempted purchase, details surrounding the attempted purchase and detail/description of the person attempting the purchase.

This register should be available to all staff selling age restricted products, for their referral prior to them starting work each day. The register should be available for inspection by a Trading Standards officer, police officer or Licensing officer.

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

The front window of the store must be kept clear from any promotional posters or anything similar, staff are require to monitor outside the store to prevent any proximity sales. Warnings should be given to adults about the offence of buying alcohol for those under 18 if suspected.

A personal licence holder will be on duty at times during licensable activity.

The maximum floor space shall be 10 % of the store indicated on a map. No alcohol can be place or stacked any where else in the store, except in the storage area out of the public view.

The premises shall not stock an Beers, Ciders, lagers and spirt mixed drinks with an ABV over 5.2 %.

The premises shall not stock any cans/bottles of lager, cider, beer or sprint based mixers unless they are in packs of four or more.

No bottles of wine or spirits less than 75cl shall be sold on the premises.

Any till used at the premises for serving customers must operate with a prompt, requiring the server to certify the age of the customer purchasing any alcoholic product.

The police licensing officer will continue to work with the applicant and any representative in an effort to develop the business and the community.

If I can be of any further assistance in this matter please do not hesitate to contact me in the licensing office.

Yours sincerely

David Fern
Police licensing Officer
Havering Borough.