

# The negative impact of late alcohol sale and excessive alcohol consumption to public health related harm

Evidence review paper - Last updated on April 8<sup>th</sup> 2019

## Summary of evidence

This briefing paper summarise the evidence from a number of scientific studies from the UK and from high-income countries that strongly suggest that increases in heavy drinking have marked negative consequences on both physical and mental health. A number of studies have shown that longer on-premise alcohol availability leads to overall increases in alcohol consumption in the form of heavy drinking and that this, in turn, has detrimental effects on individual mental and physical health through increased heavy drinking. There is also a clear association between alcohol outlet density and violence and that suggest that the issues of alcohol availability and access are important to the prevention of alcohol-related problems within communities.

In light of this evidence, several scientific reviews have concluded that restricting the hours of alcohol sales is an effective strategy for reducing excessive alcohol consumption and related harms.

## UK studies

Two related issues in public policy with respect to alcohol are how increased availability influences consumption and what effect excess consumption has on individual health outcomes. A review paper from Green et al (2015)<sup>1</sup> examined one particular source of variation in availability, bar opening hours, and how this influences consumption, physical and mental health. Authors focused on the extension of opening hours in England and Wales that occurred in 2005, and reported various sources of evidence demonstrating a marked increase in consumption, which appears to be concentrated in heavy drinking.

Within the UK, extensions of the hours of alcohol sales have been associated with increased per capita consumption of beer, increases in the number of alcohol-related diagnoses in hospitals, and increases in violent crime. Within London, increases in alcohol-related overnight attendances to the ED and alcohol-related admission rates were associated with the 2005 implementation of the 2003 Act. A study by Newton et al (2007)<sup>2</sup> reported that overnight alcohol related emergency attendances to St Thomas' hospital increased significantly (as consequence of injury and assault) after the introduction of new alcohol licensing legislation. If reproduced over longer time periods and across the UK as a whole, the additional burden on emergency care could be substantial.

Excessive alcohol consumption has a substantial impact on public health services. A key element determining alcohol availability is alcohol outlet density. A national small-area level ecological study (Maheswaran et al; 2018)<sup>3</sup> investigated the relationship between on-trade and off-trade outlets and hospital admission rates found that higher densities of on-trade outlets (pubs, bars and nightclubs; restaurants licensed to sell alcohol; other on-trade outlets) and convenience stores were associated with higher admission rate ratios for acute and chronic wholly attributable conditions.

The main finding of another study conducted in Wales (Fone et al; 2016)<sup>4</sup> was that change in walking outlet density was associated with alcohol-related harms: consumption, hospital admissions and violent crime against the person each tracked the quarterly changes in outlet density.

## International studies

Evaluations of alcohol policy changes demonstrate that restriction of trading hours of both 'on'- and 'off'-licence venues can be an effective means of reducing rates of alcohol-related harm. Despite this, the effects of different trading hour policy options over time, accounting for different contexts and demographic characteristics, and the common co-occurrence of other harm reduction strategies in trading hour policy initiatives, are difficult to estimate.

A number of international studies has shown that each additional 1-hour extension to the opening times of premises selling alcohol was associated with a 16% increase in violent crime (Rossow & Norstrom 2012)<sup>5</sup> and a 34% increase in alcohol-related injuries (de Goeij, Veldhuizen, Buster & Kunst, 2015)<sup>6</sup>.

A review of evidence by Hahn et al (2010)<sup>7</sup> found that increasing the hours when alcohol may be served in on-licensed premises by at least two hours a day increased alcohol-related harms. According to criteria adopted by the US government's Community Guide to identify effective health-related programmes, on grounds of alcohol-related harm, these findings are sufficient to support resistance to attempts to add two hours or more a day to permitted alcohol sales hours.

*Take-away alcohol and alcohol consumption:* A systematic review and meta-analyses by Sherk et al (2018)<sup>8</sup> looked at the effect of changes in the physical availability of take-away alcohol on per capita alcohol consumption. Meta-analyses studying the effect of adding one additional day of sale found that this was associated with per capita consumption increases of 3.4% for total alcohol, 5.3% for beer, 2.6% for wine, and 2.6% for spirits. Authors concluded that restricting the physical availability of take-away alcohol would be expected to result in improvements to public health.

A recent study by Atkinson et al (2018)<sup>9</sup> using an agent-based simulation model, suggested that restricting trading hours of licensed venues reduces rates of alcohol-related harm and extending trading hours of bottle shops increases rates of alcohol-related harm. The model can estimate the effects of a range of policy options.

A number of international bodies, including the World Health Organisation, have recommended the control of hours of alcohol sales as a means to reduce alcohol misuse and alcohol-related harms. (Stockwell & Gruenewald 2004<sup>10</sup>; Popova et al. 2009<sup>11</sup>).

A review of evidence (Fitterer et al, 2015)<sup>12</sup> suggested that despite, some uncertainties particular studies showed that even modest policy changes, such as 1% increases in alcohol price, 1 h changes to closing times, and limiting establishment densities to <25 outlets per postal code substantively reduce violent crime.

### Public health approach:

We in the Public Health team at Southwark Council are heeding this advice by recommending stronger policies to reduce alcohol misuse and alcohol-related harm. Indeed, **stronger policies have been associated with a reduced likelihood of youth drinking and youth binge drinking, and binge drinking in the general population** (Xuan et al. 2015)<sup>13</sup>. One of our recommendations is that the hours of alcohol sales be restricted. We are seeking a terminal hour of 00:00 for all off-licenses.

**We would recommend some restriction on high-strength beers, lagers, and ciders, given that many purchasers of these drinks are alcohol misusers, and that one of these drinks exceeds the NHS's Safer Drinking Guidelines.**

The NHS's Safer Drinking Guidelines state that males should not regularly drink more than 3-4 units of alcohol, and that females should not regularly drink more than 2-3 units. We decided to ask for the 5% because:

- One 330mL bottle of 5% beer/lager/cider contains 1.7 units of alcohol
- One 440mL can of 4.5% beer/lager/cider contains 2 units of alcohol
- One 440mL can of strong beer/lager/cider contains 4.5 units of alcohol

## References:

<sup>1</sup> Green CP, Hollingsworth B, Navarro M. Longer opening hours, alcohol consumption and health. Economics working paper series 2015/029. [http://eprints.lancs.ac.uk/76985/4/LancasterWP2015\\_029.pdf](http://eprints.lancs.ac.uk/76985/4/LancasterWP2015_029.pdf)

<sup>2</sup> Newton A, Sarker SJ, Pahal GS, et al. Impact of the new UK licensing law on emergency hospital attendances: a cohort study. *Emerg Med J.* 2007; 24(8): 532–534.

<sup>3</sup> Maheswaran R, Green MA, Strong M, et al. Alcohol outlet density and alcohol related hospital admissions in England: a national small-area level ecological study. *Addiction.* 2018;113(11):2051-2059.

<sup>4</sup> Fone D<sup>1</sup>, Morgan J, Fry R, Rodgers S, et al. Change in alcohol outlet density and alcohol-related harm to population health (CHALICE): a comprehensive record-linked database study in Wales. Southampton (UK): *NIHR Journals Library*; 2016.

<sup>5</sup> Rossow I, Norstrom T. The impact of small changes in bar closing hours on violence. The Norwegian experience from 18 cities. *Addiction* 2012, 107 (3): 530-7.

<sup>6</sup> de Goeij MC, Veldhuizen EM, Buster MC, Kunst AE The impact of extended closing times of alcohol outlets on alcohol-related injuries in the nightlife areas of Amsterdam: a controlled before-and-after evaluation. *Addiction.* 2015;110(6):955-64.

<sup>7</sup> Hahn RA<sup>1</sup>, Kuzara JL, Elder R, et al. and Task Force on Community Preventive Services. Effectiveness of policies restricting hours of alcohol sales in preventing excessive alcohol consumption and related harms. *Am J Prev Med.* 2010; 39(6):590-604.

<sup>8</sup> Sherk A, Stockwell T, Chikritzhs T, et al. Alcohol Consumption and the Physical Availability of Take-Away Alcohol: Systematic Reviews and Meta-Analyses of the Days and Hours of Sale and Outlet Density. *J Stud Alcohol Drugs* 2018;79(1):58-67.

<sup>9</sup> Atkinson JA, et al. Impacts of licensed premises trading hour policies on alcohol-related harms. *Addiction* 2018; 113(7): 1244–1251.

<sup>10</sup> Stockwell T, Gruenewald P. Controls on the physical availability of alcohol. In: Heather N, Peters TJ, Stockwell T, editors. International handbook of alcohol dependence and problems. *Chichester, UK: Wiley*; 2004. 699–719.

<sup>11</sup> Popova S, Giesbrecht N, Bekmuradov D, Patra J. Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol* 2009; 44:500–16.

<sup>12</sup> Fitterer JL, et al. A Review of Existing Studies Reporting the Negative Effects of Alcohol Access and Positive Effects of Alcohol Control Policies on Interpersonal Violence. *Front Public Health.* 2015; 3: 253.

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<sup>13</sup> XuanZ, Blanchette JG, Nelson TF, et al. Youth drinking in the United States: relationships with alcohol policies and adult drinking. *Pediatrics peds*.2015-0537.

## Impact of noise disturbance on sleep and health

**Summary of the evidence:** one of the negative repercussions of the Night Time Economy is noise pollution. Noise disturbances can occur in many ways e.g, from within licensed premises (e.g., music too loud), around licensed premises (e.g, by those queuing to get in) or more generally by people moving in/around/out of the NTE area.

Noise disturbance can lead to disturbed or fragmented sleep, which has a detrimental effect on health and wellbeing for all the population and especially children and young people. Fragmented sleep can result in short and long term health implications including; cognitive dysfunction, abnormal growth hormone release, increase of diastolic BP and increased risk of accidents, as well as lower vigilance and lower quality of life overall. This issue is particularly an issue where licenced businesses are located in residential areas.

Given the existing and compelling evidence, It is important for councils to effectively enforce noise regulations available to them in the planning permission stage, licensing stage and in the developed/operating stages

Consuming/drinking alcohol in the night-time economy (NTE) can have many benefits including a more productive economic activity and employment and social cohesion (bringing people together); however it can also come with costs, including crime, fear of crime, alcohol-related ambulance call outs/A&E admissions, public nuisance and light and noise pollution.

There are many reasons for this, One example of the potential negative impact of the NTE is relating to g. noise pollution, for example, occurs because the trading times in the NTE conflict with many people's daily routine/sleep.<sup>i</sup>

Although residential properties situated within the area of the NTE can reduce crime, this particular urban setting can also contribute to the number of people disturbed by noise. Some noise is to be expected in areas with a high concentration of NTE activities and will be factored into peoples' decision to move to the area and price that they pay to reside there. However, those in social housing or longstanding residents who moved to the area prior to the NTE development may have no choice in the matter. As such, there is a need to ensure that the levels of noise associated with the NTE are minimised e.g, by encouraging patrons to disperse from the area after closing times (rather than loitering).

Noise disturbances can occur in many ways e.g, from within licensed premises (e.g., music too loud), around licensed premises (e.g, by those queuing to get in) or more generally by people moving in/around/out of the NTE area. Noise does not necessarily occur in the same areas as crime and disorder. Much of the noise disturbances associated with the NTE tend to come "more from large numbers of people going about the business of having a good time"<sup>ii</sup>.

As explained above, the impact opening hours has on night time noise is important to take into account when considering new licensing applications. Noise from events in premises and the dispersal of those leaving an event will contribute to the disturbance of residents in surrounding areas, particularly at night. Therefore, applications requesting hours outside those stated in the Southwark Licensing Policy, within residential areas, may considerably contribute to night time noise and negatively impact sleep.

According to the World Health Organisation (WHO) (2011), fragmented sleep can result in short and long term health implications including; cognitive dysfunction, abnormal growth hormone release, increase of diastolic BP and increased risk of accidents<sup>iii</sup>. Certain groups of people are more vulnerable to noise including children, chronically ill and elderly people and shift workers (WHO, 2011). Naturally, children spend more time in bed than adults and are more exposed to night time noise (WHO, 2011). Sleep is a vital part of daily life and children in particular need uninterrupted sleep for growth and cognitive development<sup>iv</sup>. Disturbances during the night result in fragmented sleep and chronic partial sleep deprivation induces tiredness, lower vigilance and reduces daytime performance and overall quality of life<sup>v</sup>. This can have a detrimental impact on early childhood development and education, which negatively affects lifelong achievement and health (WHO, 2011).

For adolescents, psychosocial health, school performance, and risk-taking behaviors are impacted by sleep disruption. Behavioral problems and cognitive functioning are associated with sleep disruption in children. For those with underlying medical conditions, sleep disruption may diminish the health-related quality of life of children and adolescents and may worsen the severity of common gastrointestinal disorders<sup>vi</sup>

Sleep is an essential part of a healthy lifestyle and is recognised as a fundamental right under the European Convention on Human Rights (European Court of Human Rights, 2003). Night noise guidelines for Europe, set out by WHO, suggest the best protective measures to reduce sleep disturbance include the reduction of events or noise levels, or both (WHO, 2011). Children have no control over where they live. It is the council's obligation to take measures against negative impacts of night time noise in residential areas, to provide a healthy and supportive environment which maximises the health and wellbeing of children in the local area.

It is important for councils to effectively enforce noise regulations available to them in the planning permission stage, licensing stage and in the developed/operating stages. This applies to protect both the properties in the direct vicinity of the premise as well as those on the pedestrian or vehicle routes used by customers when entering/leaving. It may also be necessary to ensure licensed premises have a clear strategy to disperse customers.

To ensure night time noise is kept to a minimum, new licensing applications within residential areas should be restricted to hours within the recommended guidelines in Southwark's Licensing Policy.

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<sup>i</sup> Wickham M. Alcohol consumption in the night-time economy. GLAEconomics.2012 (working paper 55)

[https://www.london.gov.uk/sites/default/files/gla\\_migrate\\_files\\_destination/alcohol\\_consumption\\_0.pdf](https://www.london.gov.uk/sites/default/files/gla_migrate_files_destination/alcohol_consumption_0.pdf)

<sup>ii</sup> *Ibidem*

<sup>iii</sup> World Health Organisation (WHO) Europe. (2011). Burden of disease from the environmental noise: quantification of healthy life years lost in Europe

<sup>iv</sup> Van Kamp, I at al, 2013, The effect of noise disturbed sleep on children's health and cognitive development; Journal of the Acoustical Society of America

<sup>v</sup> Passchier-Vermeer, W. (2003) Night-time noise events and awakening. TNO report 2003-32, Delft, The Netherlands

<sup>vi</sup> Medic G, Wille M, Hemels MEH. Short-and long- term health consequences of sleep disruption. Nat Sci Sleep. 2017; 9: 151–161.

----- Forwarded message -----

From: [REDACTED]  
Date: Thu, Aug 1, 2019 at 6:04 PM  
Subject: Our conversation today  
To: [Clizia.deidda@southwark.gov.uk](mailto:Clizia.deidda@southwark.gov.uk) <[Clizia.deidda@southwark.gov.uk](mailto:Clizia.deidda@southwark.gov.uk)>

Hi Clizia,

Thanks again for your time today. So glad that we were able to alleviate your concerns. Below I have put in writing what we discussed:

- We are no longer pursuing any extension to our opening hours and are happy to keep them as is.
- We will be happy just to bring our licensable activities in line with our current opening hours. (Accommodating 20 minutes “drinking up time” with reference to Sales of Alcohol)
- As with the other reps, we agree on a capacity increase to 200 persons on the basis that it brings people in off the street and in to a controlled environment, whilst still allowing a buffer of 39 persons (15% of recommended capacity) to accommodate guests inside.

Please let me know if I've missed anything.

Kind regards

[REDACTED]

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**From:** Deidda, Clizia  
**Sent:** Friday, August 02, 2019 2:40 PM  
**To:** [REDACTED]  
**Cc:** [REDACTED] McArthur, Wesley  
**Subject:** RE: TOLA, 56 Peckham High Street, SE15 5DP

Dear [REDACTED],

Thank you for your email.

I have considered what we discussed yesterday and given that (i) you are no longer pursuing any extension to your opening hours and that (ii) Environmental Health has deemed a capacity of 200 persons safe, I am now in a position to withdraw my original representation.

Kind Regards,

**Clizia Deidda**

Public Health Policy Officer (Mental Health, Substance Misuse & Healthcare) | Public Health Division

Place and Wellbeing Department | London Borough of Southwark

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# MEMO: Licensing Unit

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To	Licensing Unit	Date	27 June 2019
Copies			
From	Jayne Tear	Telephone	020 7525 0396
Email	jayne.tear@southwark.gov.uk		

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Subject Re: Tola, 56 Peckham High Street, London, SE15 5DP  
- Application to vary a premises licence

I write with regards to the above application to vary a premises licence submitted by Treadgold Limited under the Licensing Act 2003, which seeks the following licensable activities:

- To change the layout of the premises as per the plan provided within the application
- To extend live music; recorded music and performance of dance and anything of a similar description to live music, recorded music and performance of dance (all indoors) on Monday and Tuesday from 23:00 to 00:00; on Wednesday and Thursday from 23:00 to 03:30 the following day, on Friday and Saturday from 03:00 to 05:00 the following day and on Sunday from 03:00 to 04:00 the following day
- To reduce late night refreshment (indoors) by 1 hour on Friday from 3:00 to 02:00 the following day
- To extend supply of alcohol (on the premises) on Friday and Saturday from 03:00 to 04:30 the following day and on Sunday from 00:30 to 04:00 the following day
- Overall opening times shall be on Monday and Tuesday from 10:00 to 03:00 the following day; Wednesday and Thursday from 10:00 to 03:30 the following day, on Friday and Saturday from 10:00 to 05:00 the following day and on Sunday from 10:00 to 04:00 the following day

## Non Standard Timings requested

- That on New Years Eve all licensable activities shall be allowed from the end of permitted hours on New Years Eve to the start of permitted hours on New Years Day
- That on New Years Eve opening hours shall be allowed from the end of permitted hours on New Years Eve to the start of permitted hours on New Years Day

## To remove the following conditions from the premises licence:

- 122** - No person under fourteen shall be in the bar of the licensed premises during the permitted hours unless one of the following applies
- a. He is the child of the holder of the premises licence
  - b. He resides in the premises, but is not employed there
  - c. He is in the bar solely for the purpose of passing to or from some part of the premises which is not a bar and to and from which there is no other convenient means of access or egress
  - d. The bar is in railway refreshment rooms or other premises constructed, fitted and intended to be used bona fide for any purpose to which the holding of the licence is ancilla. In this condition "bar" includes any place exclusively or mainly used for the consumption of intoxicating liquor. But an area is not a bar when it is usual for it to be, and it is, set apart for the service of table meals and alcohol is only sold or supplied to persons as ancillary to their table meals

- 847** - That alcohol shall not be displayed for sale and covered from view after the terminal time for the sale of alcohol.
- 848** - That Mr J K (known to authorities) shall no longer be allowed to have control or involvement in the management or day to day running of the premises.
- 345** - No service of liquor other than to members, their bona fide guests and members of other snooker and pool clubs operated by the company. No person to be admitted to membership without such application being displayed within the club for 48 hours

To amend the following conditions on the premises licence

- 307** - That the maximum number of persons permitted on the ground floor of the premises at any one time shall not exceed one hundred (100)

To be extended to 250 persons, although it is confusing in the application as 250 is written but it is also stating 229 in brackets, so I would the applicant to clarify this.

- 844** -That the door supervisors shall be provided with and shall use a mechanical counting device to record the number of patrons entering and leaving the premises so the capacity of the premises is known at all times and does not exceed the limit of 100 patrons.

If the accomodation limit is to change the above conditon will also change accordingly.

There is conflicting information within the description of the application as at point 2 it states that the application wishes to extend the opening hours on Wednesday and Thursday to 04:00 but in the opening hours box it states 03:30.

My representation is submitted under the prevention of crime and disorder and the prevention of public nuisance licensing objectives and has regard to the Southwark Statement of Licensing Policy 2019 – 2021

The premises is situated in Peckham Major Town Centre and under the Southwark Statement of Licensing policy 2019 - 2021 **the appropriate closing times for Night Clubs (with sui generis planning classification) Monday to Thursday is 01:00 hours and for Friday and Saturday 03:00 hours and for Sunday 00:00 hours**

This premises also falls within the Peckham Cumulative Impact (CIP) Area.

Section six of the policy (from page 32) deals with Southwark's local cumulative impact policies. This premises sits in the Peckham area as defined in paragraph 148 of the policy and as a night club/bar this premises falls into the class of premises in 149 of the policy.

Therefore under 130 of the policy there is a rebuttable presumption that applications for new premises licences/variations that are likely to add to the existing cumulative impact will normally be refused or subject to certain limitations. In such circumstances, it is for the applicant to demonstrate that the application will not, if granted, further contribute to the negative local cumulative impact on any one or more of the licensing objectives.

The applicant has not addressed the presumption to refuse this application within the operating schedule. I would recommend refusal of this application unless the applicant can demonstrate that the premises will not be contributing to crime and disorder and public nuisance within the policy area.

The premises licence historically has hours generous hours granted. These hours in excess of what is deemed appropriate for this area within the current licensing policy. Furthermore the operating schedule wants to double the accommodation limit and asks to remove conditions that were put on by the licensing sub-committee to promote the prevention of crime and disorder and the prevention of

public nuisance and yet does not offer any suitable conditions to replace them or promote the licensing objectives. I therefore recommend that the application is refused.

I therefore submit this representation and welcome any discussion with the applicant.

I reserve the right to submit further comments should more information be provided.

Southwark's Statement of Licensing Policy 2016 – 2020 can be found on the following link:

<https://www.southwark.gov.uk/business/licences/business-premises-licensing/licensing-and-gambling-act-policy>

Jayne Tear  
Principal Licensing officer  
In the capacity of the Licensing Responsible Authority

On Thu, Jun 27, 2019 at 7:08 PM [REDACTED] wrote:

Hello Jayne,

Thank you for making a representation.

We were fully expecting this application to go to sub-committee and are actually welcoming the opportunity to discuss the requested changes face to face. As I'm sure you are aware, we began operating at 56 Peckham High St at the end of 2017 and so a chance to properly introduce ourselves is long overdue.

I have attempted to conciliate with one of your colleague's but have found rather a lot to be misunderstood and so think a chance to meet and discuss at sub-committee would be the most productive.

I hope you agree and look forward to meeting you soon.

Kind regards

[REDACTED]  
Managing Director  
[REDACTED]

Treadgold Ltd  
[REDACTED]  
[REDACTED]  
[REDACTED]



56 Peckham High Street, London, SE15 5DP  
[REDACTED]

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[REDACTED]  
[REDACTED] Wednesday, July 31, 2019 1:56 PM

**To:** Tear, Jayne

**Cc:** Regen, Licensing; McArthur, Wesley; [REDACTED]

**Subject:** Re: REPRESENTATION RE TOLA

Hello again Jayne,

As I am sure you are aware we have delayed our subcommittee hearing until the 20th of August 2019.

One of the key reasons was to allow the opportunity for us to meet with all representatives. We have made fantastic progress with the reps we have met with so far. We have met and conciliated with 2, both of whom have now withdrawn their representations. Although I understand that it is unlikely a

