

APPENDIX B

From: Public Health Licensing
Sent: Thursday, August 01, 2019 1:38 PM
To: Regen, Licensing
Cc: Public Health Licensing; Shapo, Leidon
Subject: RE: Premier Peckham Local, 16 Peckham High Street, London, SE15 5DT

To Whom it may concern:

RE: Premier Peckham Local, 16 Peckham High Street, London, SE15 5DT

On behalf of the Director of Place and Wellbeing (incorporating the role of Director of Public Health) for Southwark (a responsible authority under the Licensing Act 2003) I wish to make a representation in respect of the above.

This representation is made in respect of the following licensing objective(s):

- Prevention of public nuisance
- Protection of Children from harm
- Prevention of crime and disorder
- Prevention of public nuisance

General Comments

The applicant requests a new application for the sale of alcohol and late night refreshments off the premises.

Requested hours of operation	Opening hours	Supply of Alcohol off the premises	Late night refreshments
Monday - Sunday	00:00 – 00:00	00:00 – 00:00	23:00 – 05:00

Concerns relating to this application

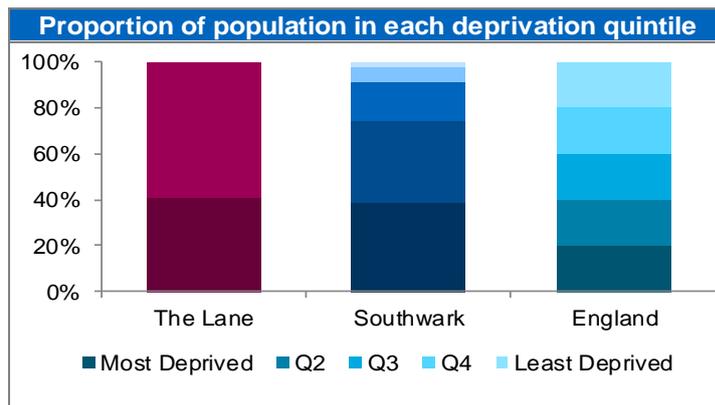
This premises is located within the Peckham Cumulative Impact Policy area (CIP), a geographical zone within which the current saturation of licensed premises is having a negative impact on the local area. These negative impacts include crime, anti-social behaviour and alcohol-related health harm. In my opinion, the applicant has not adequately rebutted the presumption that this premises will add to the cumulative impact of alcohol harms in the local area. This attached report shows that the Peckham CIP area contributes to 10.8% of Southwark's rowdy behaviour and street drinking, 6.1% of Southwark's Ambulance call-outs, and 10.4% of Southwark's non-domestic violence.

More specifically, this premises is located in The Lane ward, a ward with high levels of deprivation. Approximately 40% of residents are in the most deprived quintile and the other 60% of residents are in the second most deprived quintile (Figure 1). Additionally, almost a quarter of working age adults in The Lane ward are claiming out-of-work benefits. This is relevant because the evidence shows that deprived populations are disproportionately affected by alcohol related harm. This is corroborated by the high levels of alcohol-related ambulance call outs to this area, which is responsible for 7% of all alcohol-related

ambulance call outs in Southwark (240 in 2017 alone) and by a statistically significant higher standardised admission ratio for alcohol related harm compared to England (by 2%).

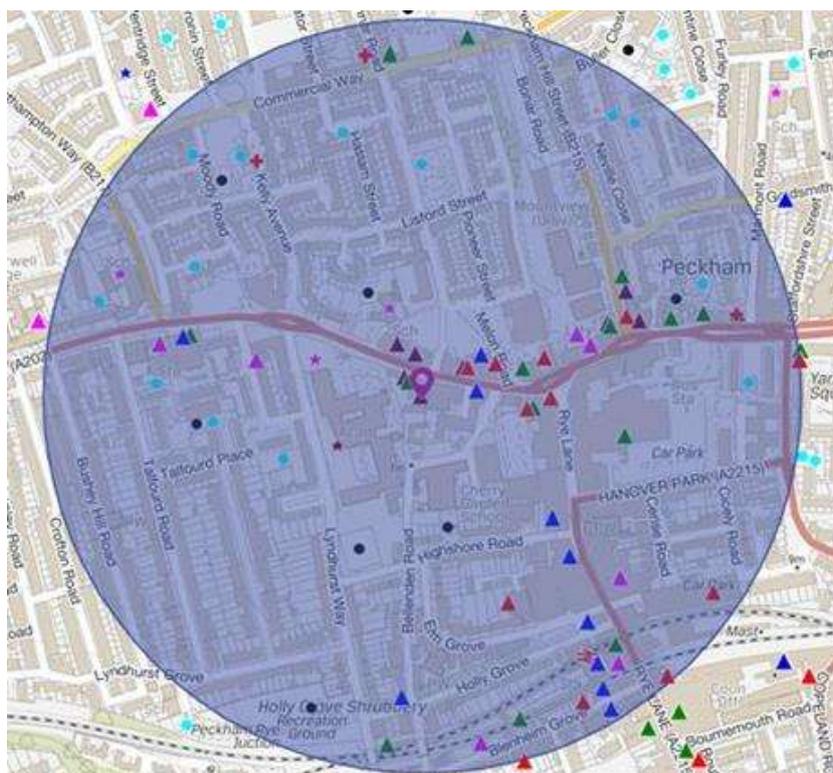
I also have concerns regarding the requested hours of operation and I would suggest a later start time for alcohol sales: early-morning alcohol purchasers are more likely to be alcohol misusers and may thereby contribute to antisocial behaviour such as street drinking. In fact, early morning drinking is considered one of the indicators for alcohol misuse that is regularly screened for in the AUDIT, CAGE and T-ACE Alcohol misuse screening questionnaires.

Figure 1 – Proportion of population in each deprivation quintile in The Lane, Southwark and England



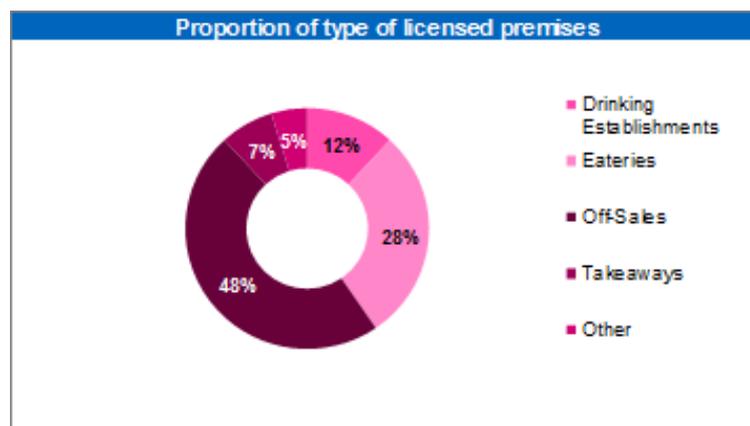
Additionally, the premises is located within a 10 minute walk from three primary schools and one secondary school (Figure 2). It is therefore likely that children will live close to this premises and are likely to be negatively impacted. For example, early in the morning, children could be exposed to street drinking on their way to school. In addition to this, this premises is in close vicinity of numerous other licensed establishments and a large proportion of these are off licences. In fact, 48% of all licensed premises in The Lane are off-sales (Figure 3).

Figure 2 – Map excerpt showing the location of various points of interests within a walking distance from the premises



-  Licensed premises - Drinking Establishments
-  Licensed premises - Eateries
-  Licensed premises - Off-Sales
-  Licensed premises - Other
-  GP surgery
-  School phase of education - Primary

Figure 3 – Number of licensed premises in The Lane



The request to serve late night refreshments until 05:00 also raises concerns due to the potential to generate public nuisance and in relation to the prevention of crime and disorder.

As per the Home Office's guidance, the provision of late night refreshment is regulated primarily because it is often linked to alcohol-fuelled crime and disorder in the night-time economy. Furthermore, it has been shown that late night food takeaways can generate crime and disorder due to large numbers of intoxicated individuals congregating in and around the venue. Furthermore, customers going in and out of the shop in the early hours of the morning may result in noise nuisance for those individuals living in the residential units above the shop or in its immediate vicinity. As per the second report attached, sleep disturbance can have a significant impact on health.

Recommendations

Given the evidence provided above, in my opinion the applicant has not adequately rebutted the presumption that this premises will add to the cumulative impact of alcohol harms in the local area and I thus recommend this application be rejected in its current state.

Should the Sub-Committee decide to grant this Premises Licence, I recommend that the hours be amended to:

Requested hours of operation	Opening hours	Supply of Alcohol off the premises	Late night refreshments
Monday - Sunday	07:00 – 00:00	11:00 – 00:00	23:00 – 00:00

The proposed changes are made in order to (i) protect local children who may come into contact with individuals buying alcohol from the premises or intoxicated on their way to school, and (ii) to reduce the means of access to alcohol for alcohol dependent residents/visitors, for whom early morning drinking could be particularly harmful.

Also, I recommend that:

- No beers, lagers, ciders or similar alcohols to be sold in cans with an Alcohol By Volume (ABV) in excess of 6.5% or in bottles larger than 750ml with an ABV in excess of 6.5% and that any off sales of alcohol shall be provided in sealed containers and taken away from the premises
- No alcohol may be stored or displayed within 2 metres of the entrance/exit of the shop (except behind a manned counter)'.

If you have any further questions, please do not hesitate to contact me.

Yours sincerely,

Clizia Deidda

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

Place and Wellbeing Department | London Borough of Southwark

160 Tooley Street | London SE1P 5LX

T: 0207 525 7707 | M: 07710 179 570

E: Clizia.deidda@southwark.gov.uk

www.southwark.gov.uk