

**Licensing Act 2003 – Representation in respect of Premises Licence**

Details of person or body making representation	
Your name:	Katie Johnson, Consultant in Public Health Peterborough City Council
Your address:	Sandmartin House Bittern Way Fletton Quays Peterborough PE2 8TY

Details of premises representation is about	
Name of premises:	Europoli Supermarket
Address of premises:	282 Lincoln Road PE1 2ND
Application no. (if known):	

Please tick one or more of the licensing objectives that your representation relates to:	
Prevention of crime and disorder	Yes
Public safety	Yes
Prevention of public nuisance	
Protection of children from harm	Yes

Please summarise your concerns about this application:	
<p><b>1. This representation is made on the basis that the above premises will sit within the ‘Op Can-Do’ cumulative impact area (CIA) which took effect on 18 April 2013, and reviewed and published on 7 January 2016.</b></p> <ul style="list-style-type: none"> <li>The Peterborough Licensing Policy 2015 states that the CIA policy ‘creates a rebuttable presumption that applications within the Op Can Do area for new premises or club premises certificates or variations that are likely to add to the existing cumulative impact will normally be refused, if relevant representations are received about the cumulative impact on the licensing objectives, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced.’</li> <li>The Peterborough Licensing Policy 2015 also states that ‘Applicants will need to address the special policy issues in their operating schedules in order to rebut such a presumption.’ The applicant does not make any reference to the premises being within the CIA and does not address these policy issues within their operating schedules.</li> <li>The CIA was subsequently reviewed and considered by the Licensing Act 2003 Committee in October 2018 which recommended retention of the CIA.</li> </ul>	
<p><b>2. The role of the DPH is to help promote the health and wellbeing of the local populations they serve. Promotion of the licensing objectives, which collectively seek to protect the quality of life for those who live and work in the vicinity of licensed premises and those who socialise in licensed premises is an important contributor to this.</b></p> <ul style="list-style-type: none"> <li>A considerable body of research examines the relationship between alcohol outlet density (AOD) and alcohol-related harms; this shows that <b>higher levels of AOD are associated with social disorder, greater alcohol consumption, alcohol related violence, injuries, alcohol-related road traffic crashes, sexually transmitted infections, child abuse and neglect, and suicides<sup>1</sup>.</b></li> </ul>	

<sup>1</sup> Public Health England, 2016. The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies – an evidence review.

- The National Institute for Health and Care Excellence (NICE) recommends that reducing the number of outlets selling in a given area is an effective way of reducing alcohol-related harm<sup>2</sup>.
- This evidence supports the restriction of the number of outlets within the Op Can Do CIA, within which this premises is located.

**Please give further details of why you believe this application will have an adverse effect on the licensing objectives.**

Although the protection of public health is not a discrete licensing objective, it can be pertinent to each of the licensing objectives. This representation is made on the basis that this application will have an adverse effect on the following licensing objectives:

**The prevention of crime and disorder:**

- Crime is an issue within the CIA; the Index of Multiple Deprivation (2015) shows that 8 out of the 11 LSOAs of the CIA are within the 20% worst in Peterborough for the crime sub-domain.
- There is a high density of premises selling alcohol in the CIA with five of the six LSOAs in Peterborough with the highest alcohol outlet density overlapping with the CIA. This application would further increase the density of premises selling alcohol in the area.
- As stated above there is a strong relationship between AOD and problems associated with social disorder which affects the health and wellbeing of the population.

**Public safety:**

- Alcohol-related hospital admissions for persons aged under 40 are significantly worse in Peterborough than the national average (see table 1 below) which demonstrates that alcohol is affecting the health and safety of Peterborough residents.
- Alcohol-related road traffic accidents in Peterborough are significantly greater than the national average indicating a clear public safety issue. There is evidence of a link between high AOD and alcohol-related road traffic accidents.
- This application would increase the AOD within the CIA which is known to be associated with a number of alcohol-related harms including alcohol-related road traffic accidents, injuries and violence.

**TABLE 1: Key Alcohol Indicators from Local Alcohol Profile, Peterborough** (Source: Local Alcohol Profiles, Public Health England)

Indicator	Time Period	Peterborough	England	Peterborough Status
10.06 - Hospital admission episodes for alcohol-related conditions (Narrow) - Under 40s, Persons, directly age-standardised rate per 100,000	2016/17	350	301	Statistically significantly higher (worse) than England
10.06 - Hospital admission episodes for alcohol-related conditions (Narrow) - Under 40s, Males, directly age-standardised rate per 100,000	2016/17	419	353	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Persons, directly age-standardised rate per 100,000	2016/17	71	47	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Males, directly age-standardised rate per 100,000	2016/17	55	40	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Females, directly age-standardised rate per 100,000	2016/17	88	54	Statistically significantly higher (worse) than England
9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Persons, directly age-standardised rate per 100,000	2016/17	1,211	1,127	Statistically significantly higher (worse) than England
9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Males, directly age-standardised rate per 100,000	2016/17	1,747	1,633	Statistically significantly higher (worse) than England

<sup>2</sup> National Institute for Health and Care Excellence, 2010. Public Health Guideline (PH24) – Alcohol-use disorders: prevention & National Institute for Health and Care Excellence 2014. Evidence update 54 – a summary of selected new evidence relevant to NICE public health guidance 24.

9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Females, directly age-standardised rate per 100,000	2016/17	778	718	Statistically significantly higher (worse) than England
12.01 - Alcohol related road traffic accidents, crude rate per 1,000	2014-16	46	27	Statistically significantly higher (worse) than England
17.01 - Volume of pure alcohol sold through the off-trade, crude rate (litres per adult)	2014	7.2	5.5	Statistically significantly higher (worse) than England

**The protection of children from harm:**

- Children are more vulnerable to alcohol related harm and may be affected in a number of ways including violence, financial problems, absenteeism from school, disrupted relationships and child maltreatment.
- This application would increase the AOD within the CIA; there is evidence that higher levels of AOD are associated with greater alcohol-related harm including those that affect children such as violence.

The applicant has not made reference that the premises sits within a CIA or demonstrated why the operation of the premises involved will not add to the cumulative impact in relation to the above licensing objectives.

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