

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:	Little Europe Store
Address of premises:	2 St. Martin’s Street, PE1 3BD
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>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 in 2016 and 2018.</p> <ul style="list-style-type: none"> The Peterborough Licensing Policy, section 11.4, 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’. The Peterborough Licensing Policy, section 11.10, also states that ‘Applicants will need to address the special policy issues in their operating schedules in order to rebut such a presumption.’ There is no information included in the application which suggests that this premises would not add to the cumulative impact on the licensing objectives. In my opinion, this does not therefore justify the licensing authority to depart from its special policy (and grant the licence) – see 11.12 of the Peterborough Licensing Policy. <p>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.</p> <ul style="list-style-type: none"> A considerable body of research examines the relationship between alcohol outlet density (AOD) and alcohol-related harms; this shows that 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 suicides¹. 	

¹ 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 harm².
- 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-specific mortality is significantly worse in Peterborough than the national 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.

Although alcohol-related hospital admissions have recently decreased, alcohol continues to have a key impact on the health of Peterborough residents, as demonstrated by the indicators shown in table 1 below which are all significantly worse than the national average.

Also of note is the high volume of pure alcohol sold through the off-trade which is currently 7.2 litres per adult, compared with a national average of 5.5 litres per adult.

TABLE 1: 'Red' Alcohol Indicators from Local Alcohol Profile, Peterborough (Source: Local Alcohol Profiles, Public Health England, accessed 1 March 2019)

Indicator	Time Period	Peterborough	England	Peterborough Status
2.01 Alcohol-specific mortality (Persons), directly standardised rate per 1,000	2015-17	13.8	10.6	Statistically significantly higher (worse) than England
3.01 Mortality from chronic liver disease (Persons), directly standardised rate per 1,000	2015-17	15.8	12.2	Statistically significantly higher (worse) than England
3.01 Mortality from chronic liver disease (Persons), directly standardised rate per 1,000	2015-17	22.3	16.0	Statistically significantly higher (worse) than England
10.05 Admissions episodes for intentional self-poisoning by and exposure to alcohol (Narrow) (Male) , directly standardised rate per 1,000	2017/18	55.1	39.5	Statistically significantly higher (worse) than England
12.01 - Alcohol related road traffic accidents, crude rate per 1,000	2014-16	38.9	26.4	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

² 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.

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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