

13th of June 2022.

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Licensing
Regulatory Services
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Dear Licensing Committee,

Re: Licensing application, Euro Store, 10a Dogsthorpe Road – 117540 – Formal Response from the Director of Public Health.

As Director of Public Health, I would like to submit a representation in respect of the above Euro Store premises licence application. The application relates to premises located within the Cumulative Impact (CI) area of Peterborough included in the Cumulative Impact Policy (CIP) adopted in 2020.

The original application for Euro Store did not make any reference to the fact the premises falls in the CI area, nor did it include sufficient measures to mitigate the impacts

However, I am aware that the Cambridgeshire Constabulary has discussed a number of mitigations with the Euro Store representative but there is evidence that these would not remove the substantial risk of poor health and community safety outcomes if the application is granted.

The CIP was introduced in recognition of the saturation of premises in the CI area. When the policy was agreed in 2020 there were a total of 85 Licensed premises in the CI area, of which thirty were off sales only and a further nineteen were on and off sales. The area is also characterised by high levels of deprivation, alcohol related hospital admissions, alcohol related anti-social behaviour and related issues of criminality.

My key concerns set out below reflect these factors.

Levels of deprivation in the area and the impact of Outlet Density.

The proposed premises' location is in Central Ward which is among the 20% of the most deprived wards in England. Out of the twenty-two wards in Peterborough, Central Ward is the fifth most deprived and nearby Dogsthorpe Ward is the most deprived ward in Peterborough. See Table 1 below for local rankings on the Index of Multiple Deprivation:

Table 1: Index of Multiple Deprivation ranking for Peterborough wards.

Local Authority	Ward Name	IMD Score	IMD Quintile_19_P_C	IMD 2080_19_P_Only
Peterborough	Dogsthorpe	42.58	1 - Most deprived	Most deprived 20%
Peterborough	Orton Longuev	42.144	1 - Most deprived	Most deprived 20%
Peterborough	North	41.039	1 - Most deprived	Most deprived 20%
Peterborough	Bretton	40.083	1 - Most deprived	Most deprived 20%
Peterborough	Central	39.402	1 - Most deprived	Most deprived 20%
Peterborough	Paston and Wa	35.919	2	Least deprived 80%
Peterborough	East	34.931	2	Least deprived 80%
Peterborough	Ravensthorpe	34.054	2	Least deprived 80%
Peterborough	Fletton and Sta	25.316	2	Least deprived 80%
Peterborough	Park	24.456	3	Least deprived 80%
Peterborough	Stanground Sou	24.451	3	Least deprived 80%
Peterborough	Eye, Thorney a	21.707	3	Least deprived 80%
Peterborough	West	19.843	3	Least deprived 80%
Peterborough	Fletton and Wc	19.632	3	Least deprived 80%
Peterborough	Orton Watervil	19.616	4	Least deprived 80%
Peterborough	Hampton Vale	17.737	4	Least deprived 80%
Peterborough	Gunthorpe	16.879	4	Least deprived 80%
Peterborough	Werrington	16.514	4	Least deprived 80%
Peterborough	Hargate and He	14.295	5 - Least deprived	Least deprived 80%
Peterborough	Barnack	11.68	5 - Least deprived	Least deprived 80%
Peterborough	Wittering	11.225	5 - Least deprived	Least deprived 80%
Peterborough	Glinton and Ca	10.348	5 - Least deprived	Least deprived 80%

There is extensive research which examines the relationship between alcohol outlet density (AOD) and alcohol-related harms.¹ This shows that areas with more deprivation tend to have greater AOD. Regulating the local availability of alcohol has the potential to address harms. The relationship between AOD and alcohol consumption and harm is complex but a number of systematic reviews have identified that higher levels of AOD are associated with greater alcohol consumption, alcohol related violence, injuries, alcohol-related road traffic crashes, sexually transmitted infections, child abuse, neglect, and suicide. The CIP was set up in recognition of the impact of alcohol misuse in the local area.

In addition, the ²National Institute for Health and Care Excellence (NICE) guideline on the prevention of alcohol-use disorders and the supporting evidence base ³ concludes that reducing the number of outlets in a given area and the days and hours when it can be sold, is an effective way of reducing alcohol-related harm. The guidelines recommend that a CIP should be used where an area is saturated to help protect the health and well being of the population but also it contributes to the achievement of the key licensing objectives.

Alcohol Related Hospital Admissions

The figures in Table 2 show alcohol related hospital admissions for the residents of central ward. In terms of numbers of admissions, Central Ward has the highest recorded numbers of admissions for alcohol specific conditions of all Peterborough wards for 2020/21 and 2021/22. There were 206 alcohol specific admissions to hospital for Central Ward residents during this 2-year period.

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

² National Institute for Health and Care Excellence, 2010. Public Health Guideline (PH24) – Alcohol-use disorders: Prevention

³ National Institute for Health and Care Excellence, 2014. Evidence update 54 – a summary of selected new evidence relevant to NICE public health guidance 24.

Ward level rates per 100,000 for alcohol related hospital admissions in 20/21 (England rates are not yet available for 2021/2022) for Peterborough as a whole were below the England average. However, in Central Ward the rate was more than double the Peterborough average and significantly higher than in England. This is a concerning public health issue and demonstrates the impact of alcohol misuse and importantly highlights why having an Impact Area in Central Ward is so important.

Table 2: Alcohol Related Admission rates

Area	2020/21		
	Rate	Lower CI	Upper CI
Central Ward	1,031	852	1,234
Peterborough	481	450	513
England	587	585	589
Rate - DSR per 100,000			
* data for England 2021/22 not yet available			

Alcohol Related Anti-Social Behaviour

I also note the letter sent in response to the Euro Store application from the Councils Prevention and Enforcement Team. This highlights local issues including:

- The historical Clock Tower near the Triangle was boarded up following complaints to Ward Councillors, the Police and the Council about people congregating, drinking, urinating, and defecating within the recesses of the clock tower.
- Resident and ward councillors regularly report that the area around Gladstone Park is being misused by drinkers and drug users.
- Residents and Ward Councillors have previously raised issues in relation to street drinking in Victoria Gardens and Century Square.
- Businesses on Lincoln Road have previously raised concerns about individuals intoxicated and entering their premises or congregating in groups in the streets, which causes concern for staff and customer safety.
- The service has recently received reports of street drinking in nearby alleyways such as Kings Walk and nearby streets such as Green Lane, Granville Street, All Saints Road, Burghley Rd, Broadway Cemetery as well as in Dogsthorpe Road itself, where the premises are to be situated.
- From anecdotal information the service the Prevention and Enforcement Team is aware that issues concerning alcohol-related Anti-Social Behaviour (ASB) are still occurring within the Millfield and New England areas, but there is significant under reporting to the Council and Police.
- The frequency of cleansing for streets and open spaces in the area is higher in comparison to other areas of the city. This is partly attributable to the amount of alcohol related litter (bottles, cans) which pose a safety risk and blight the area.

Despite the mitigations proposed by Cambridgeshire Constabulary's Licensing Officer and agreed with the applicant I remain concerned about the impact of another licence being granted in the CI.

It is highly likely that it will have a negative impact on health and wellbeing and impact on the following four licensing objectives.

- The prevention of crime and disorder
- Public safety

- Prevention of public nuisance
- Protection of children from harm

Therefore, my recommendation as Director of Public Health is that this licence is not granted.

Yours sincerely,

Jyoti Atri
Director of Public Health.
Peterborough City Council