

Dear Licensing Team

On behalf of the Croydon Healthy Behaviour Change Alliance, please find our response (attached) to the consultation on the London Borough of Croydon's Revised Licensing Policy under the Licensing Act 2003. The alliance met on 22<sup>nd</sup> October and the members present broadly approved of the proposals.

The Croydon Healthy Behaviour Change Alliance works to support and promote health improvement through positive behaviour change and healthier lifestyles. It is a multiagency group hosted by Public Health Croydon, which includes among its members:

Mike Robinson	Director of Public Health, NHS Croydon
Kate Woolcombe	Deputy Director of Public Health, NHS Croydon
Dr Sally Porter	Consultant in Addiction Psychiatry, SLAM
Katie Cuming	Public Health consultant
Jimmy Burke	Health Improvement Commissioner – Addictive Behaviours, Public Health
Melissa Vick	Health Improvement Practitioner – Healthy Lifestyles
Bevoly Fearon	Health Improvement Manager
Rob Brown	Sport and Physical Activity Team Manager, Croydon Council
Daniel Davis	Health Improvement Officer for School and Colleges, Croydon Council
Dr Ruth Clery	GP, Woodside group Practice
Andrew McCoig	Chief Executive, Local Pharmaceutical Committee
Aaron Watson	London Fire Brigade
Simon Townend	Head of Croydon Youth Services
Keith Stewart	DAAT Manager
Iain Bailey	Senior Trading Standards Manager
Tris Burls	Principal Officer Trading Standards
Shirley Johnstone	Adults Commissioner at DAAT
Jane Walker	Young People's Drug & Alcohol Team Consultant
Meena Patel	Health Champion and Public Representative
Leigh Rowland	Love Your Future Young People's Substance Misuse Service
Caroline Trevithick	Chief Inspector, Safer Neighbourhoods and Partnership
Tracy Steadman	NICE Coordinator, Croydon Public Health
Iain Bailey	Trading Standards, Croydon Council
Beata Tuszkiwicz-P	Smoking Cessation Network Manager, Public health Croydon
Rachel Nicholson	Health improvement manager - Health inequalities and mental well-being
Bernadette Alves	Consultant in Public Health

Regards

Jimmy

**Jimmy Burke**  
**Health Improvement Commissioner - Addictive Behaviours**

**CROYDON**

[www.croydon.gov.uk](http://www.croydon.gov.uk)

**Public Health Croydon**  
**Department of adult services, health and housing**  
**2<sup>nd</sup> floor, Zone D**  
**Bernard Wetherill House**

## QUESTIONNAIRE

### 1. Cumulative Impact Zones

- a) Do you have any views on the specific proposal to introduce Cumulative Impact Zones in all or any of the 4 areas of the borough set out above?

The proposed CIZ zones show some striking correlation with geographical areas statistically associated with alcohol-related harms, including crime deprivation, and we therefore believe they are appropriate.

- b) Do you believe that restricting the number of premises permitted to sell alcohol off the premises in the 4 areas will have a positive or a negative impact on crime and disorder and if so why?

As detailed in 'One on every corner - The relationship between off-licence density and alcohol harms in young people' (July 2011) findings suggest that the greater the availability of alcohol, the greater the risk of young people suffering alcohol harm. In that analysis a moderate but statistically significant relationship between the density of off-licensed premises and alcohol specific hospital admissions in young people under-18- years-old per 100,000 of population was uncovered.

Therefore, we believe that there is evidence to suggest that limiting access to alcohol through a reduction in off licenses can be an effective way of reducing alcohol-related harm to young people. The protection of children and young people is a licensing objective.

- c) Do you believe that introducing Cumulative Impact Zones as set out above will have any impact on existing premises currently permitted to sell alcohol off the premises and if so why?

We do not believe that there will be a significant impact on existing premises.

- d) Do you believe that introducing Cumulative Impact Zones as set out above will have any impact on existing premises currently permitted to sell alcohol off the premises and if so why?

(Repeated question)

### 2. Special Stress Areas

- a) Do you have any views on the special stress areas detailed above?

We believe the proposed special stress areas show some correlation with geographical areas associated with alcohol-related harms, including crime deprivation, and therefore seem appropriate.

### 3. Licensing Hours For Shops, Stores and Supermarkets

- b) Do you have any views on the Council's approach to licensing hours for shops, stores and supermarkets detailed above?

We believe the proposals as detailed in paragraph 4.2 above seem reasonable and proportionate.

### 4. General

- a) Do you have any other comments to make about the proposed revisions to the Licensing Statement?

**After the close of the consultation responses received will be reported to the Council's Licensing Committee for consideration and to seek a recommendation on adoption of the revised Licensing Statement to Full Council which will take the final decision.**

#### **End notes and references**

<sup>1</sup>Local Alcohol Profiles for England (September 2013)

<sup>2</sup> London Ambulance Service data provided by Safestats, GLA

<sup>3</sup> Alcohol-attributable fractions for recorded crime in England, by category. Source: Strategy Unit (2003b)

<sup>4</sup> One on Every Corner - The relationship between off-licence density and alcohol harms in young people. Alcohol Concern 2011

# Thomas & Thomas

Partners LLP

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Our ref: AT/TB

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08 November 2013

Dear Sirs

## **Consultation on the Licensing Act 2003 Policy – October 2013**

We act for Croydon Management Services, the Joint Venture Partnership of Westfield Shopping Towns Limited and Hammerson UK PLC (the "Partnership"). We refer to our original consultation response dated 22 April 2013, enclosed for reference.

The Partnership is considering the proposed changes to your statement of licensing policy, as published on your website in the current policy consultation. The Partnership is proposing to develop the land bounded within the area between Wellesley Road, George Street, North End and Poplar Walk. It falls within Fairfield ward and abuts Broad Green ward. The proposed development area is to the north of, although not within, the current Town Centre Special Saturation Policy Area. Further background information is set out in our original letter.

The Partnership is grateful for the Council's consideration of their submissions in respect of the previous consultation on the introduction of Cumulative Impact Zones (CIZ) within the Borough. The Partnership supports the Council in its efforts to improve the amenity of the Borough and hopes to work closely with the Council in the future.

Although the plans and CIZ boundaries provided in the current consultation document are not clear, it is our understanding that the proposed Westfield development area is no longer subject to a proposed CIZ. If this understanding is correct, the Partnership's primary concerns have now been addressed. If the proposed Westfield development area is still subject to a CIZ policy, the Partnership maintains its position and all the submissions set out in our original letter.

In any event, the lack of clarity and detail in respect of the revised CIZ areas and boundaries remains a concern and may prevent the Council from effectively consulting on or implementing the CIZ proposals.

Thank you for your consideration of this consultation response. Please do not hesitate to contact us if you would like to discuss further or arrange a meeting with my client.

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Pending receipt of any further information or maps, our client reserves the right to adduce further evidence or submissions as may be appropriate.

Yours faithfully



**Thomas & Thomas Partners LLP**

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email: [athomas@tandtp.com](mailto:athomas@tandtp.com)

Encl.

**Goddard, Michael**

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**From:** LICENSING  
**Sent:** 08 November 2013 17:17  
**To:** Goddard, Michael  
**Subject:** FW: Licensing Policy Revision For the Attention of Simon Hoare  
**Attachments:** LicPolRevConDocOct13 (2).docx; LicPolRevConDocOct13 questionnaire (2).docx

**From:** Linda Arthur [REDACTED]  
**Sent:** 08 November 2013 16:55  
**To:** LICENSING  
**Subject:** Licensing Policy Revision For the Attention of Simon Hoare

Dear Simon

Thank you for your letter, inviting the South Croydon to comment on the proposed licensing policy revision in certain areas of Croydon.

Please find attached the completed comments questionnaire.

Kind Regards

**Linda Arthur**  
**Chair**  
**South Croydon Business Association**  
[REDACTED]



## QUESTIONNAIRE

### 1. Cumulative Impact Zones

- a) Do you have any views on the specific proposal to introduce Cumulative Impact Zones in all or any of the 4 areas of the borough set out above?

The South Croydon Business Association (SCBA) is generally in favour of the proposals to introduce a CIZ in the Restaurant Quarter area, but only with regard to Off Sales of alcohol. The SCBA recognises that there is a problem with street drinkers and recovering alcoholics in care homes in the area, who rely on the purchase of cheap alcohol from off-licences and supermarkets. There is also a significant problem with pre-drinking that has an impact on the bars and restaurants in the area, as customers are using the availability from off-licences and supermarkets for cheap alcohol to start the night out and result in binge drinking.

- b) Do you believe that restricting the number of premises permitted to sell alcohol off the premises in the 4 areas will have a positive or a negative impact on crime and disorder and if so why?

In the Restaurant Quarter, the SCBA consider that the number of off-licences and supermarkets permitted to sell alcohol off the premises should be restricted. It is difficult to determine whether this will have a positive impact, but it is highly unlikely to have a negative impact.

- c) Do you believe that introducing Cumulative Impact Zones as set out above will have any impact on existing premises currently permitted to sell alcohol off the premises and if so why?

The SCBA do not believe that this will impact on existing premises.

- d) Do you believe that introducing Cumulative Impact Zones as set out above will have any impact on existing premises currently permitted to sell alcohol off the premises and if so why?

Same as c)

## 2. Special Stress Areas

- a) Do you have any views on the special stress areas detailed above?

No

## 3. Licensing Hours For Shops, Stores and Supermarkets

- b) Do you have any views on the Council's approach to licensing hours for shops, stores and supermarkets detailed above?

Although it is a positive move to reduce the hours that cheap alcohol is available to be purchased from off-licences and supermarkets, the SCBA does not feel that this goes far enough.

To be able to purchase alcohol at 8.00 am is, we feel unnecessary. Street drinkers and other alcohol dependents will find it an advantage to have easy access to alcohol at all times during their waking hours, but this is not a benefit to them, or to the area. Alcohol dependent people are unlikely to be able to be in possession of alcohol without consuming it, and therefore they need the all day availability of off-licences and supermarkets to constantly supply their addiction.

The SCBA recommends that further reductions in the hours that off-licences and supermarkets are licensed would be appropriate.

## 4. General

- a) Do you have any other comments to make about the proposed revisions to the Licensing Statement?

The SCBA is of the opinion that these revisions are a small step in the right direction, but wish to comment on the following:

- This reduction in the availability of cheap alcohol may help to reduce some street drinking and pre-loading, which in turn may help to reduce the statistical evidence of alcohol related crime. However, it should be made very clear that this should apply only to the off trade and it is important that this does not impact on the responsible approach to alcohol retailing that is practiced by the on trade in the Restaurant Quarter.
- It is important that the proposed revisions to Croydon Council's Statement of Licensing Policy should be supported by greater police presence in the Restaurant Quarter and environs to further reduce the incidence of alcohol related crime.
- Croydon Council should also consider the number of alcohol dependent



residents in the South Croydon area when taking into consideration the number of off licences and supermarkets in the area, who sell alcohol. Care homes specialising in rehabilitation should not be concentrated in any one area and the care providers should be made responsible for ensuring that those who are in their care are not causing difficulties in the area, particularly where alcohol is concerned.

- It should also be noted that we were unable to look at the statistical evidence noted on the following page in the references, as the sites are secure and the information is unavailable to the general public. We are therefore unable to be certain that the statistical evidence is correct.