

PUBLIC HEALTH

ASHTON-UNDER-LYNE · AUDENSHAW · DENTON · DROYLSDEN · DUKINFIELD · HYDE · LONGDENDALE · MOSSLEY · STALYBRIDGE

Debbie Watson
Director of Public Health
Public Health

Tameside One, Market Place
Ashton-under-Lyne, Tameside. OL6 6BH

www.tameside.gov.uk

e-mail : [REDACTED]

Call Centre 0161 342 8355

Doc Ref
Ask for James Mallion
Direct Line [REDACTED]
Date 16th January 2024

Re: Representation from the Public Health Department at Tameside Council regarding the application for a new premises license at Asda Express PFS, Stamford Street, Stalybridge SK15 1LH.

Introduction

As a Responsible Body under the 2003 Licensing Act, the Public Health Team at Tameside Council would like to raise a representation as part of application for a new premises license at Asda Express PFS, Stamford Street, Stalybridge SK15 1LH.

The representation primarily relates to:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance

Our Approach

The Public Health Team at Tameside Council screens every new license application or application for a license review/variation against a series of measures to enable the identification of applications that could have a significant adverse impact on the local community.

This screening is undertaken through a locally developed triage toolkit and ranks the 141 Lower Super Output Areas (LSOA's) in Tameside against a number of Alcohol Harm indicators and then provides an overall ranking.

The rankings are underpinned by robust official data sets as follows:



- Density of Licensed Premises – Tameside Council information as of November 2022
- Alcohol Related Hospital Admissions –3 year period 1st Jan 2018 to 31st Dec 2020
- Weekend A&E Attendances between 0000hrs and 0500hrs – Tameside ICFT, Statistics for the 1 year period 1st Jan 2020 to 31st Dec 2020.
- Alcohol Related Crime – Greater Manchester Police data from 1st October 2022 until 30th September 2023.
- Alcohol Related Domestic Violence - Greater Manchester Police data from 1st October 2022 until 30th September 2023.
- Alcohol related Anti-Social Behaviour Incidents - Greater Manchester Police data from 1st October 2022 until 30th September 2023

The information below highlights the alcohol harm for the LSOA that SK15 1LH is located in.

ENTER POSTCODE	INDICATORS	WEIGHTING
SK15 1LH		
or		
ENTER LSOA CODE	Alcohol Specific Hospital Admissions	33.3%
E01006066	Weekend A&E attendances (12-05 AM)	33.3%
	Alcohol Related Crimes	11.1%
	Alcohol and Domestic Violence Associated Crimes	11.1%
	Alcohol Related Anti-Social Behaviour Incidents	11.1%

RESULTS FOR SELECTED LSOA

E01006066

		VALUE	Z-SCORE	TAMESIDE RANK
INDICATOR	Density of Licensed Premises (per 1000 population)	5.6	0.94	11
	Alcohol Specific Hospital Admissions (DSR per 100,000 Population)	1833.2	0.69	33
	Weekend A&E attendances (12-05 AM)	2605.6	0.93	20
	Alcohol Related Crimes	7.7	-0.17	67
	Alcohol and Domestic Violence Associated Crimes	5.6	0.16	57
	Alcohol Related Anti-Social Behaviour Incidents	2.8	0.34	29
OVERALL SCORES	Unweighted Composite Score for LSOA	-	0.40	35
	Weighted Composite Score for LSOA	-	0.58	26

Alcohol Harm in relation to SK15 1LH (LSOA E01006066)

Results show that out of 141 LSOAs across Tameside this LSOA ranks

- 20th in borough for weekend A&E attendances
- 29th in borough for alcohol related anti-social behaviour
- 57th for alcohol related domestic abuse
- 11th for density of licenced premises
- 67th for alcohol related crime
- 20th for alcohol specific hospital admissions

The results from the dashboard illustrates that impact related to alcohol harm is relatively high within this LSOA, and it should also be noted that the ranking of neighbouring LSOAs is higher, displaying high levels of existing alcohol-related harms in the wider area. The immediate area around SK15 1LH has a particularly high ranking around the density of existing licensed premises. This indicates a high level of alcohol availability in this area already.

Tameside has some of the highest levels of alcohol harm in England and locally across Greater Manchester.

- Tameside has the 2nd highest alcohol mortality rate in Greater Manchester

- Tameside has the highest rate of alcohol sold through off trade in Greater Manchester and the 7th highest rate in England
- Tameside has the 3rd highest level of dependant drinkers in Greater Manchester and 10th highest in England.

There is growing body of evidence which demonstrates that the availability of alcohol contributes to increased levels of alcohol related harm, which is relevant for the area around this premises (SK15 1LH), as it has a relatively high level of alcohol related harm compared to the rest of the borough, including the 11th highest density of existing licensed premises in the borough.

Beyond the immediate area around SK15 1LH, this LSOA is surrounded by areas that have even higher levels of alcohol harm. The factors contributing to alcohol harm in these areas could be impacted by residents having easier access to alcohol from this premises, as people will be easily able to travel here from outside the immediate area.

The increased availability of alcohol from this premises, particularly the application for a 24-hour off-sale license, will increase alcohol availability and potentially increase the risk of alcohol related harms, which is a matter of public safety. The prospect of passing trade and customers from wider areas could also potentially increase the risk of public nuisance and crime & disorder in the area.

Further evidence also demonstrates that increasing the availability of alcohol, particularly via off-sales premises, contributes to increased levels of alcohol related harm. This could relate to direct harm where alcohol is immediately consumed prior to or when driving a motor vehicle at a premises of this nature, frequently visited by people driving. Wider evidence also suggests that alcohol available to be purchased and then immediately consumed either prior to or when driving a motor vehicle, or indeed by passengers within the vehicle, is likely to increase the risk of harm.¹

Conclusion

Overall, we have assessed this LSOA within which SK15 1LH sits, as having high levels of alcohol-related harm. The review of this application for a new licence at these premises needs to consider this harm to individual health and that of the local population and consider the impact on local health services, in particular the local A&E department as well as that of the local police and community safety resources.

The evidence would suggest that **representation from public health around the application for a new licence at these premises is appropriate for the following representations**

- **the prevention of crime and disorder**
- **public safety**
- **the prevention of public nuisance**

Yours Sincerely,

James Mallion
Assistant Director of Public Health

¹ Anderson, P., Chisholm, D. and Fuhr, D., C. (2009) Effectiveness and cost-effectiveness of policies and programmes to reduce the harm caused by alcohol, Lancet, 373, pp2234-46.

References

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- Theall, K.P., Scribner, R., Cohen, D. Blunthenthal, R.N., Schonlau, M. and Lynch, S. (2009) '*The neighbourhood alcohol environment and alcohol-related morbidity*', *Alcohol and Alcoholism*, Vol. 44, pp. 491-499.

I, James Mallion on behalf of Public Health in their capacity as a Responsible Authority under the Licensing Act 2003 make representation in relation to the new off-license premise application at Asda Express PFS, Stamford Street, Stalybridge SK15 1LH submitted to the Licensing Authority on 16 January 2024.

In relation to the above application, I have enclosed some information and comments below.

The representation relates primarily to: the prevention of crime and disorder; public safety; and the prevention of public nuisance.

The attached document in Appendix 1 is a letter outlining our findings including the evidence behind this in relation to the known harms of alcohol and a range of alcohol related indicators of harm in the immediate area around SK15 1LH (the lower super output area (LSOA)) which includes alcohol related hospital activity, density of licensed premises and alcohol related crimes and antisocial behaviour incidents.

See below a screenshot of the data for this area (SK15 1LH), which indicates the level of existing alcohol-related harm in the Lower Super Output Area (LSOA). This tells us that this area has a relatively high level of alcohol related harm compared to the rest of the borough, ranked 26th out of 141 LSOAs making this area in the top fifth of the borough for existing alcohol harms. This area also ranks particularly highly for the individual measures of alcohol harm including the density of existing licensed premises (11th highest out of 141 LSOAs in the whole borough); and weekend night-time A&E attendances (20th highest out of 141 LSOAs).

ENTER POSTCODE
SK15 1LH
or
ENTER LSOA CODE
E01006066

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Given the high density of existing licensed premises in this area, the wider alcohol harms across the borough should also be considered. Tameside has some of the highest levels of alcohol harm in England and locally across Greater Manchester. Tameside has the 8th highest alcohol related death rate in the country; 7th highest rate of alcohol sold through off trade in the country; and 10th highest level of dependant drinkers in the country. This demonstrates the high level of harm and the impact that alcohol has across our wider population in Tameside. This can be directly seen in the area around SK15 1LH with high levels of weekend night-time A&E attendances, which has an impact on public services.

Of particular concern with this application is the request for a license to sell alcohol 24 hours a day. A wide body of evidence demonstrates that the increased availability of alcohol contributes to increased levels of alcohol related harm, particularly from off-license sales. Given that this area already has a high density of licensed premises, increasing availability over 24 hours will provide residents with easier access to alcohol, as people will be easily able to travel here from outside the immediate area, which further increases the risk of harm. It should also be noted that the areas immediately surrounding SK15 1LH have even higher measures of alcohol related harm, and this 24 hour license at a petrol filling station may also increase alcohol availability and the potential for harms in these areas.

Given that this premises is also a petrol filling station, it is relevant to consider wider evidence which suggests that alcohol available to be purchased and then immediately consumed either prior to or when driving a motor vehicle, or indeed by passengers within the vehicle, is likely to increase the risk of harm. These issues are a matter of public safety. The nature of this premises and the extensive hours of alcohol sale mean that the prospect of passing trade and customers from wider areas could potentially increase the risk of public nuisance and crime & disorder in the area, particularly during the hours when other premises are not open to sell alcohol.

Based on the evidence and information presented in this representation and the attached Appendices, and given the nature of the premises and proposed hours of sale, I would recommend refusal of this application, or at least a reduction in the proposed hours of sale alongside any further measures to support the licensing objectives, particularly in relation to the prevention of crime and disorder; public safety; and the prevention of public nuisance.