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Date 17th December 2020

Re: Representation from the Population Health Department at Tameside Council regarding the review of Premise application from: Trading Standards, Tameside Council regarding the Alcohol License at (off licence) JIts Super Shop, 21 Market Street, Stalybridge, Tameside SK15 2AL

Introduction

As a Responsible Body under the 2003 Licensing Act, the Population Health Team at Tameside Council would like to raise a representation as part of the review of JIts Super Shop, 21 Market Street, Stalybridge, SK15 2AL

The representation primarily relates to:

- the prevention of crime and disorder
- public safety
- the protection of children from harm

Our Approach

The Population Health Team at Tameside Council has begun screening every new licence application or application for a licence 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 March 2020
- Alcohol Related Hospital Admissions –3 year period 1st April 2017 to 31st March 2020
- Weekend A&E Attendances between 0000hrs and 0500hrs – Tameside ICFT, Statistics for the 1 year period 1st April 2019 to 31st March 2020.
- Alcohol related Crime – Greater Manchester Police data from 1st April 2019 until 31st March 2020.
- Alcohol related Domestic Violence - Greater Manchester Police data from 1st April 2019 until 31st March 2020.
- Alcohol related Anti-Social Behaviour Incidents - Greater Manchester Police data from 1st April 2019 until 31st March 2020.
- A decision has been made to make a representation in relation to this specific review because of concerns relating to alcohol harm, the prevention of crime and disorder, public safety and the prevention of public nuisance.

The information below highlights the alcohol harm for the LSOA that Jits Super Shop operates in using postcode SK15 2AL

ENTER POSTCODE
SK15 2AL
or
ENTER LSOA CODE
E01006060

INDICATORS	WEIGHTING
Alcohol Specific Hospital Admissions	33.3%
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

E01006060

INDICATOR	VALUE	Z-SCORE	TAMESIDE RANK
Density of Licensed Premises (per 1000 population)	11.8	2.63	4
Alcohol Specific Hospital Admissions (DSR per 100,000 Population)	1532.0	1.24	17
Weekend A&E attendances (12-05 AM)	548.1	2.49	2
Alcohol Related Crimes	18.8	1.51	7
Alcohol and Domestic Violence Associated Crimes	2.8	2.25	3
Alcohol Related Anti-Social Behaviour incidents	26.3	1.08	2

Alcohol Harm in relation to SK15 2AL (LSOA E01006060)

Tameside has some of the highest levels of Alcohol-related Harm in England.

The levels of existing Alcohol-related harm in this LSOA within which sits SK15 2AL are within the top 10% quintile with overall high levels of alcohol harm compared to other LSOAs within Tameside.

In this LSOA there are 17 on licensed premises. This means that it has a high density of licensed premises with 11.8 licensed premises per 1000 residents and has the 4th highest level of licensed premises in Tameside.

The rate of weekend A&E attendances in this LSOA is the 2nd highest out of 141 Tameside LSOAs and in 2019 the **rate of alcohol related A&E attendances was more than twice as high as the Tameside average.**

The rate of alcohol specific hospital admissions in this area was the 17th highest out of 141 LSOAs in Tameside in 2019 the **rate of alcohol specific hospital admissions was significantly worse and nearly 2 times higher than the Tameside average.**

Alcohol related crime in this LSOA is 7th highest in the borough with alcohol related domestic assaults being the 3rd highest in the borough out of 141 LSOA areas. **The rate of alcohol related crime is significantly higher than the Tameside average**

Risks of Tobacco and Alcohol to Children and Young People

There is a wide range of evidence demonstrating the harms of tobacco and alcohol on the health of children and young people, which are one of the primary rationales behind age-restrictions for the purchase of tobacco and alcohol in England.

Guidance from the National Institute for Health and Care Excellence (NICE) outlines that children become addicted to nicotine very quickly and are likely to continue smoking into adulthood. Because the risk of disease is related to the length of time a person has smoked, people who take up smoking before the age of 18 face a greater risk of developing lung cancer and heart disease. Tobacco can also have adverse developmental impacts on children and young people such as impairing lung growth and causing asthma-related symptoms. While smoking rates generally have reduced in recent years, there are still thought to be as many as 1 million young adults in England who smoke. Also, in children and young people, those who purchase tobacco from a shop are likely to pass these on to other young people with over 50% of young people who smoked reporting that they purchased cigarettes from friends. In a wider sense, it should also be noted that Tameside experiences long-term adverse health impacts from smoking across the population with latest data showing that we have the 6th highest smoking related death rate in the country (Public Health Outcomes Framework).

Similar guidance from NICE also outlines alcohol harms for children and young people. Consumption of alcohol in childhood directly damages health. It can affect the normal development of vital organs and functions including the brain, liver, bones and hormones. Early-age alcohol consumption is also associated with wider factors such as violence, drug-use and mental health issues. While the proportion of school-aged children who have never drunk alcohol has risen in recent years, research also suggests that those who are drinking are drinking more alcohol and therefore experiencing a higher degree of harm – the North West is one of the worst affected areas. In a wider sense, it should also be noted that Tameside experiences long-term adverse health impacts from alcohol across the population with latest data showing that we have the 8th highest alcohol-related death rate in the country (Public Health Outcomes Framework).

Conclusion

Overall, we have outlined that the sale of tobacco and alcohol to children is a serious issue due to the health impacts of tobacco and alcohol use in children and young people. We have also assessed this LSOA within which SK15 2AL sits, as having very high levels of alcohol-related harm for both health and crime. The review of this 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 resource.

The evidence would suggest that **reviewing the licence of these premises is appropriate for the following representations**

- **the prevention of crime and disorder**
- **public safety**
- **the protection of children from harm**

Yours Sincerely,

James Mallion
Public Health Consultant

References

- Bryden, A., Roberts, B., McKee, M. and Petticrew, M. (2012) '*A systematic review of the influence on alcohol use of community level availability and marketing of alcohol*', *Health and Place*, Vol. 18, pp.349-357.
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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.
- NICE (2014) Smoking: Preventing Uptake in Children and Young People. Public Health Guidance PH14. [2 Public health need and practice | Smoking: preventing uptake in children and young people | Guidance | NICE](#)

Dear Mike,

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 premises licence review at (Off License) Jits Super Shop, 21 Market Street, Stalybridge, SK15 2AL submitted to the Licensing Authority on 23 November 2020.

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 protection of children from harm.

The attached document in Appendix 1 is a letter outlining our findings including the evidence and data behind this in relation to the known harms of enabling children and young people to access tobacco and alcohol, as well as the existing level of alcohol-related harm in the area.

There is a wide range of evidence demonstrating the harms of tobacco and alcohol on the health of children and young people, which are one of the primary rationales behind age-restrictions for the purchase of tobacco and alcohol in England.

Guidance from the National Institute for Health and Care Excellence (NICE) outlines that children become addicted to nicotine very quickly and are likely to continue smoking into adulthood. Because the risk of disease is related to the length of time a person has smoked, people who take up smoking before the age of 18 face a greater risk of developing lung cancer and heart disease. Tobacco can also have adverse developmental impacts on children and young people such as impairing lung growth and causing asthma-related symptoms. While smoking rates generally have reduced in recent years, there are still thought to be as many as 1 million young adults in England who smoke. Also, in children and young people, those who purchase tobacco from a shop are likely to pass these on to other young people with over 50% of young people who smoked reporting that they purchased cigarettes from friends. In a wider sense, it should also be noted that Tameside experiences long-term adverse health impacts from smoking across the population with latest data showing that we have the 6th highest smoking related death rate in the country (Public Health Outcomes Framework).

Similar guidance from NICE also outlines alcohol harms for children and young people. Consumption of alcohol in childhood directly damages health. It can affect the normal development of vital organs and functions including the brain, liver, bones and hormones. Early-age alcohol consumption is also associated with wider factors such as violence, drug-use and mental health issues. While the proportion of school-aged children who have never drunk alcohol has risen in recent years, research also suggests that those who are drinking are drinking more alcohol and therefore experiencing a higher degree of harm – the North West is one of the worst affected areas. In a wider sense, it should also be noted that Tameside experiences long-term adverse health impacts from alcohol across the population with latest data showing that we have the 8th highest alcohol-related death rate in the country (Public Health Outcomes Framework).

See below a screenshot of the data for this area (SK15 2AL) which indicates the level of existing alcohol-related harm. The 6 individual indicators give an overall picture of alcohol-related harm in the Lower Super Output Area (LSOA). This tells us that this area has some of the highest levels of existing alcohol-related harm in the borough. Of particular note in the individual indicators: the density of licensed premises is 4th highest in the borough (out of 141 LSOAs); the rank for weekend alcohol-related A&E attendances (from midnight to 5am) in this

area is 2nd highest in the borough (out of 141 LSOAs), and more than double the Tameside average; the degree of alcohol related crime in this area is high with the 7th highest level of overall alcohol related crime in the borough and the 2nd highest rate of alcohol related antisocial behaviour incidents and the 3rd highest rate of alcohol related domestic abuse crimes (out of 141 LSOAs). This means that, compared to the rest of the borough, there is a high availability of alcohol in this area along with very high levels of impact on A&E and a very high rate of alcohol-related crimes.

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Alcohol Specific Hospital Admissions	33.3%
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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

E01006060

INDICATOR	VALUE	Z-SCORE	TAMESIDE RANK
Density of Licensed Premises (per 1000 population)	11.2	2.52	3
Alcohol Specific Hospital Admissions (DSR per 100,000 Population)	1532.0	1.24	17
Weekend A&E attendances (12-05 AM)	5485.1	2.44	2
Alcohol Related Crimes	18.8	1.51	7
Alcohol and Domestic Violence Associated Crimes	7.8	2.25	3
Alcohol Related Anti-Social Behaviour Incidents	20.9	2.28	2

Based on this information I would recommend reviewing the license for these premises as the evidence of under-age sales of alcohol and tobacco represents a direct risk of harm to children, which should be prevented. We have also presented evidence that indicates that there is a high degree of existing alcohol-related harm in this area, particularly in relation to crime and disorder, due to the high levels of alcohol-related crime; and public safety, due to the high levels of weekend night-time A&E attendances.