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Date 8th February 2021

Re: Representation from the Population Health Department at Tameside Council regarding the Premise application from: Audenshaw Service Station, Droylsden Rd, M34 5SP

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 24 hour alcohol license application for Audenshaw service station, Droylsden Rd, Audenshaw, M34 5SP

The representation primarily relates to:

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

Our Approach

The Population Health Team at Tameside Council has begun screening 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 October 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 Audenshaw Service Station, Droylsden Rd, M34 5SP is located.

ENTER POSTCODE
M34 5SP
or
ENTER LSOA CODE
E01005969

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

E01005969

INDICATOR	VALUE	Z-SCORE	TAMESIDE RANK
Density of Licensed Premises (per 1000 population)	2.3	-0.15	50
Alcohol Specific Hospital Admissions (DSR per 100,000 Population)	658.5	-0.29	77
Weekend A&E attendances (12-05 AM)	2327.3	-0.52	94
Alcohol Related Crimes	2.3	-0.52	107
Alcohol and Domestic Violence Associated Crimes	0.5	-0.51	91
Alcohol Related Anti-Social Behaviour Incidents	0.2	-0.43	123

Alcohol Harm In relation to M34 5SP (LSOA E01005969)

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

- 94th in borough for weekend A&E attendances
- 123rd in borough for alcohol related anti-social behaviour
- 91st for alcohol related domestic abuse
- 60th for density of licenced premises
- 107th for alcohol related crime
- 77th for alcohol specific hospital admissions

The results from the dashboard illustrate that the impact related to alcohol harm is relatively low in this LSOA, compared to the rest of the borough. However it does rank in the top 50% of areas in the borough based on the existing density of licensed premises.

Beyond the immediate area, this LSOA is surrounded by areas that have considerably higher levels of alcohol harm. Aldwyn (ranked 15th highest overall out of 141 LSOAs), Ryecroft (ranked 18th) and Moorside (ranked 49th). 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.

It should also be noted that 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 (2nd highest in Greater Manchester)
- Tameside has the 7th highest rate of alcohol sold through off trade in the country (highest in Greater Manchester)
- Tameside has the 10th highest level of dependant drinkers in the country (3rd highest in Greater Manchester) (Source: Public Health Outcomes Framework)

There is growing body of evidence which demonstrates that the availability of alcohol contributes to increased levels of alcohol related harm. It therefore follows 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 (Anderson, 2009).

There is extensive research highlighting that there is a direct link between density of licensed premises and alcohol-related harm in the surrounding environment (Livingston, 2011); (Richardson, 2014). This evidence suggests that the density and prevalence of alcohol retail outlets influences alcohol-related harms including: creating greater physical availability of alcohol within a local area; reducing the prices of alcohol products due to localised competition; and increasing the visibility of alcohol availability in the local area.

Some of the most recent research by Richardson et al (2014) highlighted that *"off-sales outlets have the greatest potential for alcohol-related harm, due to their cheaper product, large volumes obtainable, accessibility for under-age drinkers, and the absence of control over the final recipient"*.

Conclusion

Overall, we have assessed this LSOA within which M34 5SP sits, as having relatively low levels of alcohol-related harm compared to other parts of the borough for both health and crime, however nearby areas do experience much higher levels of harm. The wider alcohol-related harms experienced by people across Tameside should be considered, as well as the evidence suggesting that further increasing the density of licensed premises can increase alcohol related harms. 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 in the area and crime & disorder.

Yours Sincerely,

James Mallion
Public Health Consultant

References

- 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.
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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.

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 new off-license premises application at Audenshaw Service Station, Droylsden Road, M34 5SP submitted to the Licensing Authority on 12 January 2021.

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 and data behind this in relation to the existing level of alcohol-related harm in the area and our rationale for submitting this representation.

See below a screenshot of the data for this area (M34 5SP) 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 low level of alcohol related harm compared to the rest of the borough. However it does rank in the top 50% of areas in the borough based on the density of existing licensed premises (60th highest out of 141 LSOAs)

ENTER POSTCODE
M34 5SP
or
ENTER LSOA CODE
E01005989

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

E01005989

INDICATOR	VALUE	Z-SCORE	TAMESIDE RANK
Density of Licensed Premises (per 1000 population)	2.3	-0.16	50
Alcohol Specific Hospital Admissions (DSR per 100,000 Population)	559.6	-0.29	77
Weekend A&E attendances (12-05 AM)	2107.3	-0.52	94
Alcohol Related Crimes	2.3	-0.52	107
Alcohol and Domestic Violence Associated Crimes	0.5	-0.51	91
Alcohol Related Anti-Social Behaviour Incidents	0.8	-0.43	122

Beyond the immediate area, this LSOA is surrounded by areas that have considerably higher levels of alcohol harm. Aldwyn (ranked 15th highest overall out of 141 LSOAs), Rycroft (ranked 18th) and Moorside (ranked 49th). 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.

Given the increased availability of alcohol that this application represents, as it is a location easily accessible by car and also the request for a 24-hour license, 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.

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. This also relates to the wider and longer term harms of increased alcohol availability in the area which may increase alcohol visibility and could also drive down prices due to local competition. One insight from the research shows that *"off-sales outlets have the greatest potential for alcohol-related harm, due to their cheaper product, large volumes obtainable, accessibility for under-age drinkers, and the absence of control over the final recipient"*.

Overall, we have assessed this LSOA within which this premises is located, as having relatively low levels of alcohol-related harm compared to other parts of the borough for both health and crime, however nearby areas do experience much higher levels of harm. The wider alcohol-related harms experienced by people across Tameside should be considered as well, as the evidence suggesting that further increasing the density of off-sales premises can increase alcohol related harms in general. 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.

Based on this information I think it is appropriate to consider refusal of, or applying conditions to this new off-license premises application, as the evidence we have indicates that further increasing the density of licensed premises and the availability of alcohol, particularly a 24-hour license, could increase the level of alcohol-related harm.