

Appendix Six - Written Responses

Community Safety Service: Response

Request to include information on Martyn's Law and the new Protect duty likely to come into force in 2024/25, and to ask licence holders/applicants to consider the ACT e-learning Training provided the Police.

Community Safety – Violence Against Women and Girls (VAWGs) and Hate Crime Team: Response

Fantastic that the council are including misogyny in this policy and trying to protect women from misogyny. These are welcome additions to the licensing policy.

Request to add that Licensees are encouraged to sign the Tower Hamlets No Place for Hate Organisational Pledge which can be found via www.towerhamlets.gov.uk/hatecrime.

Resident 1: Response

My main concern - and that of neighbours in RavenscroŌ Street and Ezra Street - is the noise generated by people drinking on the street or in the park at night who use restaurants or pubs and bars that have outside tables. Others see the drinking going on in the street and join them and licensed premises have capitalised on this in the summer months.

Resident 2: Response

The consumer's interests and protection must be paramount priorities for public authorities. I believe that the LBTH and other local authorities should have enforcement powers to compel businesses operating within their areas to be obliged to take responsibility for all aspects e.g. adequate heating, ambience, appropriate billing ,disability adaptations , fire security etc. In other words, I am surprised that you do not have sufficient powers to uphold a full range of consumer entitlements!

I also know from my own experience in dealing with business and licensing of residential properties, local authorities are pro- active on compliance and rightly so!!

The same principle should apply to catering businesses.

My understanding of the responses from the LBTH is that the current premises licensing policy does not provide adequate protection for consumers. The information is self-explanatory within the attachment.

Port of London Authority: Response

Thank you for consulting the Port of London Authority (PLA) on the London Borough of Tower Hamlets Statement of Licensing Policy Review Consultation 2023. I have now had the opportunity to review the consultation documents and can confirm the PLA has no comments to make.

Metropolitan Police: Response

I have reviewed the proposed Tower Hamlets licensing policy and have consulted with my Licensing Officers who have requested some changes to the policy. I have considered these proposed changes and I feel that they would go further to assist venues in upholding the Licensing objectives and will also assist my officers when working with venues.

The changes bring clarity to what is expected of venues when conducting risk assessments for their activities and enables them to bring about steps to mitigate risk, working with my Licensing Team where appropriate.

The changes put the emphasis on venues to have suitable egress plans to ensure that their customers can leave the area safely at the conclusion of an event.

The Night Time Economy is an important part of Tower Hamlets which is constantly evolving as new venues open and attract new people to the borough and therefore the Licensing Policy must evolve with it.

Changes requested:

9.2 Crime and Disorder

When addressing crime and disorder the applicant should identify any particular risks (having regard to their particular type of premises and / or activities) which are likely to adversely affect the promotion of the crime and disorder licensing objective. The applicant should also list such steps that are required to deal with these identified issues. Both risks and mitigating steps should be included within the applications operating schedule. Where the Metropolitan Police, acting as a responsible authority, makes recommendations in respect of an application relating to the licensing objectives the Licensing Authority would expect the applicant to incorporate these into their operating schedule.

25.1 Risk Assessments

When the Licensing Authority's discretion is engaged it expects applicants to have regard to the advice of the Metropolitan Police in relation to the licensing objective of the prevention of crime and disorder. Therefore, it recommends for significant events (please see note below for definition), a comprehensive risk assessment is undertaken by premises licence holders to ensure that crime and disorder and public safety matters are identified and addressed. Completing of such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should consider the provision and numbers of SIA security, search, ejection policy and entry and egress plans. Such risk assessments should be written down, stored for a year and made available to Responsible authorities upon request. Accordingly, for premises that wish to stage promotions, or events (as defined below) the Licensing Authority expects that applicants carry out the Risk Assessment and debrief processes and when relevant include in their Operating Schedule.

Licence Holders should discuss their Risk assessments with Metropolitan Police at least 14 days prior to the proposed event.

The additional event/promotion specific risk assessment is for where the venues have events/promotions with different artistes or DJs than their usual DJ/Artistes.

The Premises Licence Conditions proposed by can be recommended as part of a pool of model conditions in appendix 3. They will not be imposed on any licence as a condition, unless as suggested in the applicants operating schedules, or the licensing authority is engaged, i.e. where relevant representations for any application are received. If conditions are to be applied, they will have to be relevant and proportionate to the matters raised in representations.

Definition of a 'Significant Event'

A significant event will be deemed to be: any occasion in a premises licensed under the provisions of the Licensing Act 2003, where there will be a live performer(s) – meaning musicians, DJs, MCs or other artist; that is promoted in some form by either the venue or an outside promoter; where entry is either free, by invitation, pay on the door or by ticket.

Licensees are advised to consult the local Metropolitan Police Licensing Unit to clarify whether their proposed event is significant.

26.6 Temporary Event Notices Process

Risk Assessments: In order to assist the Metropolitan Police, we would strongly urge that Risk Assessments are either included with the TEN submission or sent to the Police via the details in Council's Responsible Authority list on their website. Such risk assessments need to include a description of the event, any risks identified with the event such as increased possibility of intoxicated customers, underage attending the event, or perceived drug use, and any mitigating steps that have implemented to address the identified risks. Where promoted music events are taking place at the premises such a risk assessment should include checking previous venues where the artists / performers / promoters have performed recently to see if there have been any issues, and any social media sites to check for any potential problems such as a young audience. The risk assessment should also consider the provision and numbers of SIA security, search, ejection policy and entry and egress / dispersal plans.

Environmental Health – Noise Team: Response

Prevention of Public Nuisance

Licensed premises, especially those operating late at night and in the early hours of the morning, can cause a range of nuisances impacting on people living, working or sleeping in the vicinity of the premises.

Like many London boroughs, Tower Hamlets has many areas of the borough where businesses and residents are “cheek by jowl” with each other. Thus, the correct balance needs to be adopted ensuring residents are not **unduly** disturbed by licensed premises, whilst ensuring this does not stifle growth in the licence trade.

Though all licensed premises must promote the licensing objectives, and thus actively try to prevent public nuisance being caused by their licensable activities, there are some factors that this Licensing Authority would expect **to** applicants to consider and where appropriate address in their operating schedule. These are:

- a) Music/performances
Measures to reduce impact of noise on residents
- b) Queue management
Measure to prevent obstruct access to properties, pavements.
Measure to reduce the impact of people noise on residents
- c) Ingress and Egress
Measure to prevent people noise during ingress and egress
- d) Use of outside areas (see 11.7 below)
- e) Deliveries, particularly pick-ups by vehicles
Measures to prevent noise/fumes from engines, drivers (including smoking),
- f) Bottle disposal
Done at reasonable time to prevent impact on residents **e.g. between 8am and 8pm**
- g) Litter
Measures to prevent littering around the venue from patrons

The Licensing Authority appreciates that it would not be necessary or appropriate for all applications to have measures to prevent the above issues. Nevertheless, we will take a strong view on applications for licences that are in close proximity to residential premises, and whose **intended** use has a higher likelihood of causing public nuisance. This also includes those applications in areas covered by a Cumulative Impact **Zones (CIZ)**. Especially where the applications falls outside the scope of any exceptions to such **CIZs**.

The Licensing Authority, where its discretion is engaged, will consider, where appropriate, attaching conditions to licences and permissions to prevent the

problems identified listed above, or any other conditions it considered appropriate and proportionate to promote the licensing condition of prevention of public nuisance.

Street Furniture – placing of street furniture, which includes advertising boards, on the highway can cause a public nuisance by way of obstruction or encourage consumption of alcohol on an unlicensed area. The Licensing Authority expects applicants to have ensured that they fully comply with the Councils rules relating to authorisation of obstructions on the highway, and that the required authorisations are obtained prior to submitting a licence application. Where proportionate and appropriate, and its discretion is engaged, the Licensing Authority will impose conditions in relation to street furniture, including on private land.

Fly Posting – The Council has experienced problems with "fly posting" in relation to venues that offer entertainment. Fly posting is the unauthorised posting of posters / advertisements etc. Where it considers it proportionate and appropriate, and its discretion is engaged, the Licensing Authority will attach conditions relating to the control of fly posting to ensure that venues clearly prohibit all fly posting in their contract terms with others and they effectively enforce this control.

Beer Gardens and outside areas – since the ending of the restrictions imposed during the Coronavirus pandemic, we have seen an increase the use of outside areas. This has also been encouraged by Government under the Business and Planning Act 2020. We want to strike the right balance between allowing businesses to thrive whilst still protecting residents of the borough being **unduly** disturbed by the night time economy. Hence, we would encourage applicants address this concern in their operating schedule by detailing what mitigating measures they intend adopt to reduce any disturbance the use of the outside area is likely to have on neighbouring residents. Such measures could include:

- limiting the amount of patrons permitted in the outside area, and/or,
- **restricting use of areas after certain time**
- ceasing its use after a certain time.

Where disturbance of residents from outside areas is likely, and where its discretion is engaged, this Licensing Authority may add conditions limiting the numbers of person permitted to use any outside areas, and/or seek to cease the use of any outside areas after 21:00 hours.

Party Boats - An increasing number of complaints have been received in London Boroughs that border the River Thames in relation to "Party Boats", which use the River. In respect of this we would encourage applicants for Party Boats to consider adopting the "Boat" conditions, listed in our Model Conditions in Appendix 2, where appropriate to promote the Licensing Objective of Prevention of Public Nuisance. Furthermore, where disturbance of residence from these party boats is likely, and where its discretion is engaged, this Licensing Authority may add one or more of the boat conditions from our Model Conditions.

Public Health Tower Hamlets: Consultation Response

Consultation name:	Statement of Alcohol Licensing Policy Review Consultation
Date	20 th April 2023
For	Tower Hamlets, Environmental Health and Trading Standards
From	Somen Banerjee, Director of Public Health
Author:	Sarah Metcalfe, Programme Officer for Healthy Environments, Public Health
CC	Katy Scammell, Associate Director of Public Health

Tower Hamlets Public Health Division supports the draft statement of alcohol licensing policy. Below outlines the evidence linked to this policy and provides a number of evidence-based recommendations to strengthen it.

Alcohol as a public health issue

In England, among people aged 15 to 49 years, alcohol is the leading cause of ill-health, disability, and death^{1,2}. All major body systems are affected by alcohol consumption. The effects vary according to several factors including age, gender, body mass index (BMI), pattern and volume of alcohol consumption and the length of time someone has been consuming alcohol. The health effects of alcohol can be acute, for example poisoning or injury, and chronic, for example liver cirrhosis, cardiovascular disease or female breast cancer². It is a major cause of hospital admission, as either a consequence of acute alcohol intoxication or of alcohol misuse over time. In 2019/20 there were 280,000 hospital admissions in England where the main reason was attributable to alcohol, this is 2% higher than in 2018/19 and 8% higher than in 2016/17³. Alcohol misuse across the UK is a significant public health problem with major health and social ramifications and economic consequences estimated at between £21 and £52 billion a year².

The impact of harmful drinking and alcohol dependence is much greater for those in the lowest income bracket and those experiencing the highest levels of deprivation. This is

known as the 'alcohol-harm paradox' and the reasons for this relationship are not fully understood. People on a low income do not tend to consume more alcohol than people from higher socio-economic groups. The increased risk is likely to relate to the effects of other issues affecting people in lower socio-economic groups. In England, the areas with the lowest rates of alcohol related mortality are mainly found in the south and the highest rates are situated predominantly within the Northwest – correlating with levels of deprivation. In the UK, alcohol-related deaths for the most deprived decile were 53% higher than the least deprived in 2013⁴. Tackling alcohol related harm is a route to tackling health inequalities in general.

The night time economy (NTE) is a term that encompasses many different activities, for example, theatre, pubs, restaurants and clubs. NTEs are an important part of our towns and cities and are estimated to bring in over £60 billion to the UK economy every year⁵. In addition to the health harms associated with alcohol consumption, alcohol contributes to broader societal harms including crime, violence, anti-social behaviour and disorder⁶, many of which occur within the context of the NTE⁷. As licensing authorities, councils play an important role in regulating the NTE and good alcohol licensing practice is an important part of how we can address alcohol misuse⁸.

Tower Hamlets context

A recent drug and alcohol needs assessment by the Centre for Public Innovation found that there has been an increase in the percentage of Tower Hamlets adults binge drinking (drinking heavily over a short space of time) on their heaviest drinking day from 11.9% in 2011-14 to 19.5% in 2015-18, higher than London and national rates. Tower Hamlets residents who reported drinking more than the current Chief Medical Officer guidelines (14 or more units/week) increased to 22% in 2015-18, whereas trends in drinking patterns in London and England have decreased. Binge drinking carries many risks, including short-term harms like accidents or injuries which increase between two to five times as a result of drinking between 5 and 7 units of alcohol in a single drinking session, compared with not drinking any alcohol at all⁹. There is evidence that binge drinking increases your risk of long-term health problems including becoming dependent on alcohol, alcohol-related cancer and

heart disease³. Binge drinking can also affect memory and, in the longer term, can lead to serious mental health problems¹⁰, with some evidence showing it is linked to suicide¹¹.

In 2019/20, 28% of children in Tower Hamlets were living in a low-income family. Once housing costs are considered, 56% of children were living in a low-income family – equivalent to 17 children in a class of 30, the highest level of child poverty in the UK. Over the past 5 years, the number of children estimated to be living in low-income families in Tower Hamlets increased by more than 6000. Furthermore, 44% of older people in Tower Hamlets live in low-income households, also the highest proportion in England¹². As mentioned above, the impact of harmful drinking and alcohol dependence is much greater for those experiencing deprivation¹². The London Borough of Tower Hamlets has a duty of care to its residents and so must ensure the alcohol environment is as safe as possible.

Alcohol and licencing: national and local policy

It is the duty of all licensed premises to create a safe and secure environment for their customers and to take steps to promote all four of the licensing objectives¹³:

- Prevention of crime and disorder
- Public safety
- Prevention of public nuisance
- Protection of children from harm

Following revisions to the Licensing Act for England and Wales¹³, the Police Reform and Social Responsibility Act¹⁴ saw health authorities (and specifically Directors of Public Health) in England designated a statutory role as a 'responsible authority' (RA) in the licensing process.

The Tower Hamlets Partnership Substance Misuse Strategy 2020-25¹⁵ highlights the overall aim of reducing drug and alcohol-related harms to individuals, families and communities in Tower Hamlets and to enable more residents to recover from problematic substance misuse. It identifies three key priority areas:

1. Early intervention and prevention

2. Effective evidence-based treatment and recovery support
3. Reducing drug and alcohol-related crime and anti-social behaviour through enforcement and regulation

Tackling inequality by building a strong, inclusive and fair borough is the key objective for the Tower Hamlets Local Plan 2031; with themes focusing on improving the health and wellbeing of our local population and creating strong, resilient and safe communities. Creating safe, social spaces is a key focus of our Health and Wellbeing Board.

Sharing data to reduce alcohol-related harms

Using data to support licensing decisions to reduce crime and violence is well established. An example of this is The Cardiff Model which involves systematically collecting data on violence. This data is then used to conduct research to establish the factors that increase or decrease the risk of violence, using the information generated to design, implement and evaluate and then scale up interventions shown to be effective, turning surveillance data into action¹⁶. Research into the model found that most violent incidents which result in emergency hospital treatment are not known to the police¹⁶. By combining Emergency Departments (ED) data and police data, it is easier to build an accurate picture to direct prevention efforts. This model has been used in South Wales, where the dataset was analysed on a weekly basis and enabled the redeployment of police resources to violence hotspots in the NTE. The local authority also made changes to licencing – restricting opening hours and even revoking certain establishment’s licenses where data showed that they were not working to prevent violence and promote the licensing objectives¹⁶.

Information Sharing to Tackle Violence (ISTV) is a small, anonymised dataset, overseen by MOPAC and collected by Emergency Departments in England and Wales. The data is shared with local Community Safety Partnerships on a regular basis. ISTV is a development of the Cardiff Model. Data shared is as follows:

- time and date of the incident
- time and date of arrival in A&E

- specific location of the incident
- primary means of assault (for example a weapon or body part used)

The ISTV data is available to Tower Hamlets Community Safety Partnerships and can be used to support licensing in the borough, however, the quality and accuracy of the data collected is not always sufficient to support analysis and mapping. We also note capacity pressure within data analytics teams meaning regular analysis of the data is not always possible. Tower Hamlets has used data to map violence in the past - a 2019 Tower Hamlets needs assessment found time trends for violence in those younger than 16 years, with peaks on weekdays related to school closure, and violence affecting young people aged 16–24 years occurring later in the evening. This paper also estimated the cost of violence in the borough to be over £100 million per year¹⁷. Although there is evidence to show that data sharing and mapping can support licensing activities, more resource needs to be invested to ensure the data collected is of the best quality and that there are skilled analysts who can translate data into rationale for action.

Cumulative Impact Zones

As part of the 2003 Licencing Act¹³, the government introduced a cumulative impact assessment (CIA) as a tool for licensing authorities to limit the growth of licensed premises (both on and off-licences) in a problem area – Cumulative Impact Policies strengthen the powers of local authorities to reject licence applications for retail alcohol sales in cumulative impact zones (CIZs), where adverse effects of alcohol availability can be demonstrated. This provision provides Public Health with an opportunity to contribute their expertise. Tower Hamlets has two Cumulative Impact Zones (CIZs) – Brick Lane and Bethnal Green.

A natural experiment, following the introduction of CIZs in the London Borough of Islington found that there were short-term decreases in rates of alcohol licences granted but these reductions were not sustained¹⁸. Another study found a similar picture – using 10 years of licensing data from Southwark, changes in the issuing of licenses were examined the introduction of three CIZ, relative to control areas. The study found that there was no evidence that the establishment of CIZs resulted in a reduction of the number of successful

licence applications, it also found that there was no discernible effect on the relative proportion of licence applications receiving objections in these areas¹⁹. A 2019 study, however, suggested that CIZs may play a more nuanced role in shaping local alcohol environments – with CIZ implementation associated with greater increases in number of eateries relative to the control area. They concluded that CIZs may be useful as policy levers to shape local alcohol environments to support the licensing goals of specific geographical areas and diversify the NTE²⁰.

The evidence for CIZs is mixed. They are, after all, just a tool and it is Tower Hamlets' responsibility to use this tool most effectively, ensuring greater scrutiny of licence applications these areas.

The Director of Public health as a responsible licensing authority

The 2003 Licencing Act designated public health as a 'Responsible Authority'. This gave public health the right to review and comment on applications for alcohol licences alongside other professional bodies with a more established licensing remit, including trading standards, environmental protection, children's services, licensing, police and others. This has provided Public Health with a mechanism to review alcohol licence applications, make representations (or objections) as appropriate, and offer recommendations for how – and whether – licences to sell alcohol should be granted⁸. These representations must demonstrate if proposed or existing licensed premises undermines one or more of the four licensing objectives.

In Scotland, there is a fifth licensing objective: "Protecting and improving public health". Researchers have found that, due to this additional objective, Scottish public health teams feel more empowered and more able to influence licensing outcomes, conversely, English public health teams felt limited in their licencing role⁸. This same study also identified that, across the 24 London local authorities studied, there was a range of ways in which different teams contributed to the licensing process. The capacity to undertake licensing work varied from 0 to >9 hours per week. Some public health teams screened licence applications so

that they reviewed only in areas with existing high availability of alcohol or where vulnerable groups were deemed to need protection.

In a government guide to how public health teams can support licensing policy it is stated 'Public health teams are experts in the public health field and are responsible for presenting the public health perspective to other responsible authorities and decision makers'²¹. There are various approaches public health teams can take to their contribution to the licensing process and, with finite resource, time spent on licensing work must be balanced with the other needs of the borough.

Community Alcohol Partnership

The Tower Hamlets Community Alcohol Partnership (CAP) in Lansbury was a local partnership of the council (public health, DAAT, trading standards, licensing), police, alcohol retailers, housing associations, schools, health providers and community groups (Safe East, Poplar Harca, Spotlight) to reduce alcohol harm among young people by preventing underage drinking and associated anti-social behaviour. The core activities focussed on education, positive activities for young people (e.g. cooking programme, gardening), enforcement, retail best practice and engagement. This previously ran in Tower Hamlets, however the contract ended in March 2021. This programme was managed by one CAP co-ordinator within the licensing team, which Public Health previously funded as an FTE post. This work was supplemented with work carrying out activities such as outreach, doing visits to local retailers (e.g. bars), carrying out award ceremonies for local retailers for highlighting good practice. They set up competitions to for providers to do no or low alcohol offers within the premises in which they would be given certificates. Some high-level outcomes of the CAP include over 400 pupils from 5 schools engaged in sexual exploitation and grooming workshops where alcohol was used as an example of a grooming tool; designated premises supervisors were held more accountable which led to a 100% pass rate in test purchases for alcohol in the CAP area; Tesco agreed to provide a free responsible retailers training for all off licenses across the borough although there was a poor attendance from off-licenses; improvement in year 11 pupils' awareness on effects of alcohol improved compared to

previous year. Nationally, there is a growing evidence base surrounding CAP that they help to reduce alcohol-related crime and disorder, including in under 18s.

Public health recommendations – relevant to the licencing objectives

We support the reviewed statement of licensing policy and recommend the following additions are made to strengthen it:

1. Data suggests that binge drinking in Tower Hamlets is increasing. To mitigate this harmful drinking, we would recommend that emphasis be placed on enforcement and reviews of premises that are found to be selling alcohol to people already drunk.
2. The public health evidence suggests that data sharing between EDs, police and the council can reduce violent crime. The statement of alcohol licensing policy describes in section 18 and 27, collaboration between police, licensing teams and other RAs. This joint working could be enhanced by including local EDs and ambulance services. Hospital and ambulance conveyance data on alcohol related attendances and violence in the NTE can contribute to identifying if the Crime Prevention objective is being undermined. For this to be successful in Tower Hamlets, data analyst capacity will need to be increased to enable the translation of this data into action. Capacity and training also need to be developed in ED administration staff to ensure the data collected is of good quality. This could be overseen by the Alcohol Liaison Nurse team within Bart's NHS trust.
3. CIZs are a useful tool to control the availability of alcohol in problem areas. However, the public health evidence suggests that this tool is often poorly utilised. A review could be conducted to evaluate the success of the current CIZs in Tower Hamlets to identify ways in which the implementation of the CIZs could be strengthened.
4. Public health is well placed to play a role in licensing decisions. This role could include supporting the access to data and analysis.
5. Tower Hamlets could explore opportunities to fund a co-ordinator within the Licensing Team to re-introduce the Community Alcohol Partnership scheme ensuring that it is tailored to fit the local community needs.

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