

About the Institute of Alcohol Studies

The Institute of Alcohol Studies (IAS) is an independent institute bringing together evidence, policy and practice from home and abroad to promote an informed debate on alcohol's impact on society. Our purpose is to advance the use of the best available evidence in public policy decisions on alcohol.

Consultation Response

Question 1. What are the strengths of London's night-time economy? In other words, what is good about London at night?

London has a dining scene and cultural offer that is unrivalled in the UK, as befits a Capital City and also a Global City. This is fueled in large part by an internationalism not experienced elsewhere in the UK. Internationalism and cosmopolitanism create opportunities for the evening and night-time economy that are not apparent in many parts of the UK, but are a feature of 21st Century Global Cities. In particular, international visitors and a cosmopolitan citizenry create audiences for types of activity that would be considered 'too niche' or 'unsustainable' elsewhere. A key niche, already being exploited, is the development of attractions at night that involve drinking no alcohol at all, such as clusters of unlicensed restaurants, cafes and food-market pop-ups, museum, gallery and gym openings, theatre performances and outdoor events. IAS strongly supports the increasing need for public policy to facilitate alternatives to alcohol-centred nightlife that reflect London's status as a destination that supports the lifestyle choices of all residents and visitors.

The up-take of Cumulative Impact Policies and Late-Night Levy schemes across London is, we believe, supportive of the strategic aim of diversifying the evening and night-time economy; placing checks and balances on the development and proliferation of the type of post-midnight operating alcohol-fuelled business models that generate the most harmful social effects for individuals and the greatest negative impacts on the urban environment for residents and visitors. London Boroughs should be supported in their ability to use such 'place management' tools to best effect by matching particular aspects of alcohol and licensing policy to identified needs in specific locations.

Transport has improved. Night Tube has provided better connectivity between nightlife hubs. This generally assists safer, more affordable and rapid journeys for people on nights out and night workers. Nonetheless, as a result of experience now gained of securing the network, British Transport Police have recently warned of the potential dangers faced by intoxicated lone travellers who may face victimization by sexual predators who exploit their vulnerability whilst traveling on the service. BTP also highlight that intoxicated persons are taking personal safety risks whilst under the influence of alcohol which could give rise to serious injuries to self and others.¹

It is clear that the wider social, environmental and service-provision impacts of Night Tube are not fully understood. This is a key theme of public policy for the night-time city and there is a

¹ Simpson, F. 2018. Don't fall asleep on the Night Tube: police chief's warning to lone travellers. Retrieved from: <https://www.standard.co.uk/news/crime/dont-fall-asleep-on-the-night-tube-senior-police-officer-warns-londoners-a3730091.html>. Accessed 8 February 2018.

need for thorough on-going monitoring and independent evaluation of Night Tube which reflects its role as a large scale non-piloted 'social experiment'. There is an opportunity to showcase London to the rest of the world as a 'best practice' example of managing the ENTE. However, on-going monitoring and sustained support for the safety and security of the Night Tube service are necessary to effectively demonstrate this.

Question 2. What are the weaknesses of London's night time economy? In other words, what is not good about London at night? What does it lack?

Notwithstanding our comments in relation to Q1 regarding the unique non-alcohol attractions which exist in London, there remains an unmet need for more social spaces and attractions that offer alternatives to alcohol-centred activities at night; and especially in the late-night, post-23:00 hours, period. Such spaces would offer a more relaxed social atmosphere and levels of comfort for, for example, business travellers, workers, families and minority ethnic groups and have the associated effects of encouraging a broader range of street life, vibrancy and spending habits. A large-scale street observation study commissioned by the City of Westminster in 2014 set out to record various measures of 'pro-social' and 'anti-social' behaviour within 10 locations across the West End at night throughout the evening, night-time and late-night periods.² The study found that:

"Drunkenness and the actions, behaviour and sounds associated with it had higher average incidences per hour and increased in prevalence throughout the 10-hour recording period... Urination in a public place also increased in the post-midnight period. Street drinking was predominately an evening and late-evening activity, reducing after midnight.

"Drunkenness Sound" and "Drunkenness Action" categories recorded as pro-social were noted, with less degree of temporal divergence, across the 10-hour period than those recorded as anti-social. Levels of anti-social drunkenness were generally much lower in the evening than at night, with two isolated exceptions linked to unseasonably hot weekend weather and the events calendar. Levels of prevalence for pro-social drunkenness reduced with the lateness of the hour. Similarly the conviviality of groups of visitors was, on average, high in the evening period. This reduced steeply as the hours then progressed.

These findings are consistent with the results of research in UK cities exploring ENTE patron drinking patterns, which suggest that average consumption of alcohol as measured in units increases as nights progress, with associated negative outcomes across a range of health and criminal justice measures".

Spaces to find non-alcoholic refreshment, such as late-opening coffee bars, would strongly support the later opening of retail outlets, theatres and other cultural attractions, allowing London's potential as an inclusive night-time social hub to really 'come alive'. Venues that do not serve alcohol or hot food to takeaway after 23:00 would not be required to pay the Late-Night Levy in those Boroughs operating such schemes, as they would be exempt under the

² City of Westminster. 2017. Evening and Night Time Economy. Retrieved from: <https://www.westminster.gov.uk/evening-and-night-time-economy>. Accessed 8 February 2018. p. 8.

relevant legislation.

Central nightlife hubs in London tend to lack the clear programme of annual supporting open-air events for different audiences that sometimes exist in regional cities across the UK, elsewhere in Europe and internationally. Where these do exist, Business Improvement Districts often provide the impetus. The 'Lumiere London' light festival, which recently completed its second year, is an excellent example of what can be achieved through partnership work; other central events include the Charlotte Street food festival and the Store Street night-time street party (part of the Bloomsbury Festival). More broadly, however, few Business Improvement Districts in London have a clear night-time focus. Such focus, together with the introduction of new BIDs, should be promoted in order to help deliver the necessary supportive services, including open air events, to help attract new audiences and make the night-time street environment safer, more attractive, and sustainable.

In recent years, many small music and comedy venues, especially in Westminster, but also in Camden, Hackney, Lambeth, Islington, The City and other areas have faced closure or crippling costs associated with rising property values, rent rises, business rate increases and other market pressures driven directly, or more indirectly, by the re-development of properties and land for residential uses. IAS broadly supports the current Planning (Agent of Change) Bill, which aims to place the onus upon property developers to take into account *existing* music venues in the area of a proposed development. Similarly, we support, in principle, the use of 'Asset of Community Value' allocations in Planning, as methods of preserving those night venues that are recognized by communities to be distinctive, genuine and valuable 'cultural assets'.

Question 3. What are the threats to London's night time economy? In other words, are there issues or trends we will have to address in the short, medium or long term?

Inequality and homogenization

Property values, rental and business rates increases continue to squeeze out many forms of non-mainstream, lower profits, premises such as LGBTQI+ venues, live music venues, EDM nightclubs and local cinemas. Such venues are important because they drive innovation and diversification in the night-time economy / cultural industries and crucially, in terms of the licensing objectives, they provide night-time entertainment that is not centred around alcohol consumption. Replacements are often residential developments, or chain bar / restaurant offers from larger companies who can benefit from economies of scale. The lack of affordable space for small business start-ups and independents drastically reduces the opportunities for creative activities in night-time venues, which support the UK music and fashion industries, amongst others. The 2017 Treasury recalculation of 'rateable values' affected small and medium-sized businesses in some boroughs dramatically, with steep rises in property values since the last calculation of 'business rates' in 2008. London Borough of Hackney has consulted on proposals for a Discretionary Business Rates Relief scheme for allocating financial support to businesses

that have seen a significant increase in their Business Rates for 2017/18.³

This is an approach we believe the GLA should support as part of its vision for a sustainable, diverse and creative night-time economy.

Gentrification of the night-time economy effectively excludes lower-income groups on the basis of high cost of products and services and admissions policies. It has been further suggested that BME groups in London have both a lower than average income and therefore less disposable income to spend⁴ and a tendency to drink less than White audiences, possibility for cultural reasons.⁵

These factors may make events for BME audiences less attractive business propositions for licensed premises which derive most of their income from alcohol sales (admissions fees often going to the event promoters).⁶ Furthermore, some door staff / management / door ‘pickers’ arguably operate door policies that unfairly discriminate on the basis of race and other “protected characteristics” and are therefore potentially open to challenge under the Equality Act 2010. In 2015, West End nightclub DSTRKT had protests outside its doors regarding this issue. The protests gained much support on social media, including from prominent London-based BME recording artists; many posts shared similar experiences and the issues continue to be discussed as concerns for Londoners.⁷

Discriminatory door policies are long-standing and fundamental issues that the night-time industries need to address, the underlying reasons for which have been explored in several academic studies, such as the work of Hobbs et al.⁸ and Hadfield analysing door policies in West End nightclubs.⁹

Racial discrimination has no place in the 21st Century night-time economy. There are serious issues of social integration at stake. As Guardian journalist Jesse Bernard writes, with: “...gentrification disproportionately affecting marginalized communities in boroughs such as Newham, Hackney and Haringey, poor Londoners are being pushed to outer boroughs such as Merton, Croydon and Bexley, away from a vibrant club culture”.¹⁰

If the GLA ‘Night Vision’ is to be achieved, there needs to be a Code of Practice which licensed venues adopt concerning admissions policy and “protected characteristics”. This Code of practice must be supported by universally-applied mandatory training on non-discriminatory

³ Hackney Council. 2017. Discretionary Business Rates Relief Consultation 2017/18. Retrieved from: <https://consultation.hackney.gov.uk/revenues-benefits/discretionary-business-rates-relief-consultation-2/results/18854705-final---business-rates-drr-consultation-report.pdf>. Accessed 8 February 2018.

⁴ Bernard, J. 2018. Form 696 is gone – so why is clubland still hostile to black Londoners?. Retrieved from: <https://www.theguardian.com/music/2018/jan/31/form-696-is-gone-so-why-is-clubland-still-hostile-to-black-londoners>. Accessed 8 February 2018.

⁵ BBC News. 2015. Binge-drinking continues to fall in young adults. Retrieved from: <http://www.bbc.co.uk/news/health-31452735>. Accessed 8 February 2018.

⁶ Bernard, J. 2018. Form 696 is gone – so why is clubland still hostile to black Londoners?. Retrieved from: <https://www.theguardian.com/music/2018/jan/31/form-696-is-gone-so-why-is-clubland-still-hostile-to-black-londoners>. Accessed 8 February 2018.

⁷ Pulse Radio. 2017. London Mayor to Investigate SoHo Nightclub DSTRKT's Blatantly Racist Door Policy. Retrieved from: <https://pulseradio.net/articles/2017/02/london-mayor-to-investigate-dstrkt-nightclub-s-allegedly-racist-door-policy>. Accessed 8 February 2018.

⁸ Hobbs, D., 2003. Bouncers: Violence and governance in the night-time economy. Oxford University Press on Demand.

⁹ Hadfield, P., 2008. From threat to promise: Nightclub ‘security’, governance and consumer elites. *The British Journal of Criminology*, 48(4), pp.429-447.

¹⁰ Bernard, J. 2018. Form 696 is gone – so why is clubland still hostile to black Londoners?. Retrieved from: <https://www.theguardian.com/music/2018/jan/31/form-696-is-gone-so-why-is-clubland-still-hostile-to-black-londoners>. Accessed 8 February 2018.

practice and the law, for staff working in licensed premises and for security personnel trained and certified by the SIA. The training requirement and Code of Practice should be included in Local Authority 'Statements of Licensing Policy'.

At a broader level, the problems of homelessness and begging are very apparent in many areas of active nightlife in London. The night-time industries could play a greater role in providing forms of assistance to the homeless communities in their midst and could lobby for change, such as more outreach services and hostel provision. Street-drinking often amplifies the plight of the homeless. Licensed off-sales providers should avoid selling alcohol to all customers who appear to be drunk, including homeless people, in accordance with s141 of the Licensing Act 2003. There is a need for Police and Councils to do more to advise retailers on these matters and where necessary to take enforcement action under the Licensing Act.¹¹

Underlying these issues is the tendency for alcohol-dependent street drinkers to seek out the cheapest 'hits' of strong alcohol available to them. This was an issue raised as part of the Government-Industry 'Responsibility Deal' and led to the development of 'Reducing The Strength' (RtS) initiatives, whereby Local Authorities and Public Health Teams encourage off-licences not to sell beer or cider of 6.5% ABV or above as a voluntary undertaking. The Local Government Association has produced guidance for councils considering setting up such schemes.¹²

In the absence of a national Minimum Unit Price (MUP) for alcohol, the GLA should support Local Authorities to set up RtS schemes in street drinking 'hot spots', as part of the toolkit of responses to reducing alcohol-related harms amongst London's street drinking population.

More broadly, the introduction of a national MUP would be a less resource intensive and likely more effective way of achieving similar outcomes. In Public Health England's 2016 review of various alcohol control policies, they noted that 20 years after implementation, a 60p MUP would be modelled to save 1,166 lives and prevent 17,040 alcohol-related hospital admissions. These would be concentrated amongst the heaviest drinkers, such as the street drinkers discussed here.¹³

Liveability

London has a large residential population, even in the most central areas, with people living in and amongst commercial nightspots. This is true, not only of long-standing 'urban villages' in prime Central London, but also in key night locations such as Brixton, Dalston, Vauxhall, and Kentish Town. In the latter 'Urban Centres', the residential presence often existed long before the rise of the night-time economy and residents may have experienced areas change around them, sometimes detrimentally in the case of late-night noise, waste management and feelings of personal security. The attractions of London as a diverse and liveable city are under threat if

¹¹ Alcohol Policy UK. 2011. Report says alcohol enforcement laws are not fully used, but enforcement alone is not the solution. Retrieved from: www.alcoholpolicy.net/2011/11/enforcement-alone-wont-solve-underage-drinking-problem.html. Accessed 8 February 2018.

¹² Local Government Association. 2016. Reducing the strength: Guidance for councils considering setting up a scheme. Retrieved from: <https://www.local.gov.uk/sites/default/files/documents/reducing-strength-guidanc-795.pdf>. Accessed 8 February 2018.

¹³ Public Health England. 2016. The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An evidence review.

the appeal of living near to urban ‘high streets’ is undermined by the business activities and incoming patrons of the night-time economy. Incompatibility of lifestyles is one of the factors that can drive wider social divisions, as expressed in the media discourses that pit ‘east enders’ v ‘hipsters’.

In relation to liveability and environmental quality, it is important to remember that the Councils have chronic issues to deal with in regards to street cleansing and removing litter. These require extra resources and, in areas of intensive night-time leisure use, must be completed in the early hours of the morning.

The London Borough of Hackney's 2017-18 Licensing Consultation is supported by a ‘Cost v Benefit Analysis’ conducted by Ortus Economic Research. A headline finding of which is, as follows:

“The results for economic Costs v Benefits of the Evening and Night-time Economy (ENTE) “...show that for every £1 of cost bourn by the public purse it receives £3.97 in revenues. Thus, the ENTE can be said to generate a return of four times the costs incurred. Total revenues for Hackney [as a geography] are estimated at £93m and the costs £24m for 2015.

However, the position is complicated by an asymmetry between the destination of relevant costs and revenues. Specifically, local ENTE costs are met by three main parties; the Council, the Metropolitan Police Service and the National Health Service (especially by Emergency Medicine and Ambulance Services), whereas the majority of revenues accrue outside the Borough to HM Treasury. This means that from a local authority perspective, the ENTE generated costs of £3.6m, while returning only £2.1m in 2015.”¹⁴

Costs of alcohol misuse to the NHS

With regard to ‘Health Costs’, the report goes on to state:

“The Hackney ENTE is estimated to cost the NHS around £1.3 million per year due to acute responses to drink-related issues between the hours of 6pm and 6am. The majority of this comes from increased pressure on A&E departments due to drink-related issues (£876k based on London averages) while an additional £440k is estimated to be spent on ambulance call outs for ENTE related incidents.”¹⁵

It is important to remember that these are the estimated costs for one Borough. The broad impacts of alcohol-related assaults, accidents and acute alcohol poisoning on health and

¹⁴ Hackney Council. 2017. Hackney’s Evening and Night Time Economy – a Cost Benefit Analysis. Retrieved from: https://consultation.hackney.gov.uk/licensing/licensing-policy-consultation/supporting_documents/Evening%20and%20Night%20Time%20Economy%20%20a%20Cost%20Benefit%20Analysis.pdf. Accessed 8 February 2018. p. 2.

¹⁵ Hackney Council. 2017. Hackney’s Evening and Night Time Economy – a Cost Benefit Analysis. Retrieved from: https://consultation.hackney.gov.uk/licensing/licensing-policy-consultation/supporting_documents/Evening%20and%20Night%20Time%20Economy%20%20a%20Cost%20Benefit%20Analysis.pdf. Accessed 8 February 2018. p. 35.

emergency services nationwide have been well-documented.¹⁶

A report by the London Health Observatory in 2012 calculated that 89% of alcohol-specific hospital admissions in London were emergency response and that the total London-wide cost of alcohol-specific admissions was £51m.¹⁷

London Ambulance Service (LAS) have a web-page dedicated to providing the public with information on 'alcohol-related 999 incidents' which notes the following:

"In 2013/14 our staff dealt with 71,868 patients who'd had too much to drink - that's six per cent of our total workload. Although during some hours of Friday and Saturday nights more than one in five 999 calls is down to alcohol.

The boroughs with the highest proportion of these calls are Westminster and Camden.

Our figures are based on information given at the time the 999 call is received in our control room, or where alcohol is recorded by our frontline staff as being the main reason for us being needed to treat a patient.

What this means is that the figures don't take into account other incidents, such as assaults, minor falls and other injuries, that may have happened because someone had been drinking".¹⁸

In 2017, the LAS gave evidence to the All-Party Parliamentary Group on Alcohol Harm's 'Inquiry into the Impact of Alcohol on the Emergency Services' citing data from 2015 to indicate that the burden of calls was increasing:

"From April to September 2015 the LAS attended 20,777 Category A alcohol-related incidents, that's almost 71% of the total Category A alcohol-related incidents we were attending back in 2010/2011 in just 5 months".¹⁹

In a press release made as part of the LAS 'Getting Drunk is Not a Game' campaign of December 2016, Dr Fenella Wrigley, Medical Director at LAS stated:

"Every ambulance crew responding to someone who has simply had too much to drink, is an ambulance crew not responding to an ill or injured person who needs them.

"Patients reported to be collapsed and unconscious trigger the fastest ambulance response. It's not possible to tell over the phone whether they have a serious illness or injury, or have simply had too much to drink, so we have to prioritise them immediately.

¹⁶ IAS. 2015. Alcohol's impact on emergency services. Retrieved from: http://www.ias.org.uk/uploads/Alcohols_impact_on_emergency_services_full_report.pdf. Accessed 8 February 2018.

¹⁷ Baker, A., Lodge, H. and Jacobson, B., 2012. Closing time Counting the cost of alcohol-attributable hospital admissions in London. London: London Health Observatory.

¹⁸ London Ambulance Service. n.d. Alcohol-related 999 incidents. Retrieved from: http://www.londonambulance.nhs.uk/news/alcohol-related_calls.aspx#alcoholcalls. Accessed 8 February 2018.

¹⁹ Alcohol Concern. 2016. The Frontline Battle: An Inquiry into the Impact of Alcohol on Emergency Services by the All-Party Parliamentary Group on Alcohol Harm. Retrieved from: <https://www.alcoholconcern.org.uk/Handlers/Download.ashx?IDMF=1ba9e142-7fa9-4dbf-a052-91de000813c5>. Accessed 8 February 2018. p. 16

*“Meanwhile, other patients such as a child with a broken arm, an uninjured elderly faller or someone involved in a road traffic collision will wait longer for an ambulance”.*²⁰

These factors underpin our suggestions elsewhere in this consultation response as to the need to diversify London’s night-time economy offer and move away from alcohol-led activities, toward a broader range of possibilities for London’s nightlife.

‘Alcohol Treatment Centres’

In order to deal with times of peak demand associated with heavy drinking, the NHS and partner agencies around the UK have developed a number of initiatives to ease the pressure of alcohol-related calls on ambulance and A&E services. These include schemes, which provide public facilities in and amongst night-time economy areas, staffed by medically qualified personnel.

Alcohol Treatment Centres, also known as Alcohol Intoxication Management Services (AIMS) provide an alternative to A&E departments and ambulance assistance for patients who have had too much to drink, helping to free up hospital beds. As was raised in the All-Party Parliamentary Group on Alcohol Harm report previously mentioned: “Every alcohol-related attendance entails both resource and financial costs. Financially, the mean cost per alcohol related attendance was estimated at £249; and the cost to those admitted to hospital was £851.”²¹ Furthermore, a proportion of police officers on duty at night at any one time will be called upon to deal with taking people who have been drinking to hospital.

There is evidence from a Cardiff trial that AIMS can be successful in easing pressure on public services and assisting nightlife patrons.²² However, establishing and sustaining a scheme requires significant investment and on-going commitment, including for the evaluation and measurement of local impacts arising from a scheme’s implementation. A team from the universities of Sheffield and Cardiff are currently conducting an ‘Evaluating the Diversion of Alcohol-Related Attendances’ (EDARA) UK-wide project, comparing six cities that have AIMS with six cities that do not. The work involves an ethnographic study, records patient experiences in both AIMS and A&Es, assesses impact on key performance indicators in healthcare and evaluates the cost-effectiveness of AIMS.²³

It will be important for the GLA to follow the results of this evaluation. The EDARA project will be reporting later this year and will hopefully bring together examples of projects which may encourage adoption of these type of initiatives, as the uptake of AIMS across boroughs has so far been limited. There have recently been just two schemes: in Clapham and in Kingston - the Soho Alcohol Recovery Centre having closed. If AIMS are judged to be cost-effective and useful

²⁰ London Ambulance Service. 2016. Getting drunk is not a game, says London Ambulance Service’s festive campaign. Retrieved from: http://www.londonambulance.nhs.uk/news/news_releases_and_statements/getting_drunk_is_not_a_game_s.aspx. Accessed 8 February 2018.

²¹ Alcohol Concern. 2016. The Frontline Battle: An Inquiry into the Impact of Alcohol on Emergency Services by the All-Party Parliamentary Group on Alcohol Harm. Retrieved from: <https://www.alcoholconcern.org.uk/Handlers/Download.ashx?IDMF=1ba9e142-7fa9-4dbf-a052-91de000813c5>. Accessed 19 February 2018. p. 14

²² Brewster-liddle, J., Parsons, W. and Moore, S., 2013. Setting Up An Alcohol Treatment Centre. *Emergency Nurse*, 21(6), pp.14-18.

²³ Irving, A., Goodacre, S., Blake, J., Allen, D. and Moore, S.C., 2017. Managing alcohol-related attendances in emergency care: can diversion to bespoke services lessen the burden?.

interventions, who will provide the leadership, finance and staffing for local multi-agency partnership initiatives? Schemes are often locally run and agreed, and financial and staffing pressures on the public sector can make it difficult for partners to commit the resources.

The Clapham scheme ('Clapham Night Hub') is supported by the 'This Is Clapham' BID; however, not all areas have BIDs and other sustainable funding streams would need to be established. It is important that the Night Vision for London acknowledges that some people's drinking on a night out is problematic for their own health and the safety of others. If AIMS are judged to be effective it seems fair and right that night venues and other drinks retailers share the cost of supporting these customers through access to AIMS, funded through the vehicle of BIDs, Late-Night Levies, or voluntary bespoke arrangements.

Crime, disorder and public nuisance

The evidence-base for responses must be location-specific and interventions targeted.

When considering policies and strategies for the night-time economy it is important to note that national, regional and city-wide trends in alcohol consumption and in alcohol-related crime, disorder and public nuisance are not appropriate reference points for action. City-wide trends mask the central issues of concern for harm reduction partnerships which, if responses to such problems are to be effective, must focus on the pattern of incidents, social situations and licensing landscape to be found in particular places at particular times. These 'hot spots' and 'hot times' can often be as specific as to relate to problems in and around one particular venue, or small cluster of venues. On other occasions, the issues may be more cumulative and relate to the sheer number of licensed premises and night-time patrons. Assessing appropriate responses to such challenges requires local intelligence / evidence-gathering and a consideration of the most appropriate tools for targeted action.

There have been a number of calls for London-wide adoption of the 'Cardiff Model' of centrally collecting and sharing data from hospital emergency departments and police to inform policy development and improve strategies to reduce alcohol-related harm. This was a key policy recommendation of a 2015 'Night-Time Economy Cost v Benefit' study commissioned by the City of Westminster,²⁴ as well as being a recommendation for enhanced data sharing to facilitate more targeted policy interventions nationally, as highlighted by a recent review of approaches to control the 'physical availability of alcohol' in the UK and Australia conducted by IAS in collaboration with the Australian organization, Foundation for Alcohol Research and Education (FARE).²⁵

There have been improvements in data sharing between individual A&E departments, Community Safety Partnerships and the MPS locally. The London Information Sharing to Tackle Violence (ISTV) programme is a two-year initiative coordinated by the Mayor's Office for Policing and Crime (MOPAC) and funded through the 2015/16 Home Office Innovation Fund.

²⁴ City of Westminster. 2017. Evening and Night Time Economy. Retrieved from: <https://www.westminster.gov.uk/evening-and-night-time-economy>. Accessed 8 February 2018. S59, p. 12.

²⁵ Foster, J., Harrison, A., Brown, K., Manton, E., Wilkinson, C., and Ferguson, A. 2017. Anytime, Anyplace, Anywhere?. Retrieved from: <http://www.ias.org.uk/uploads/pdf/IAS%20reports/rp25052017.pdf>. Accessed 8 February 2018.

The programme seeks to develop more effective data sharing between Community Safety Partnerships, health services and other partners. ISTV collates and analyses anonymised A&E data to inform community safety strategies and resourcing decisions across partner agencies. The data is shared monthly and included in the pan-London 'SafeStats database', which is made available as an on-line Portal for partners.²⁶ SafeStats facilitates more detailed analysis and mapping of the A&E data alongside a range of other data, such as police crime data and TfL incident data.²⁷

It is very important for the GLA to support the on-going development of this data sharing initiative as part of its Night Vision. IAS recommends the inclusion of licensing statistics provided by the Boroughs to allow further accurate triangulation of data sets to understand the potential sources of localized alcohol-problems.

One way to access sustainable funding streams for local action in the crucial post-midnight period is the Late-Night Levy. LNLs have been adopted, or are being considered, by a number of Boroughs, led by Islington whose experience, since introducing the Levy in 2014, has been self-reported as positive, particularly in funding an enhanced uniformed presence on the street and a 'first response vehicle' providing basic medical care; initiatives used in conjunction with best practice schemes and improved licensing procedures. Section 142 and Schedule 18 of the Policing and Crime Act 2017 have made LNL powers more flexible, allowing authorities to introduce the LNL in, for example, specific streets, rather than having to introduce it for the whole of the local authority area, as was previously the case. A further key change is that the LNL has been extended to also apply to premises that are permitted to offer late-night refreshment, for example takeaways (the LNL previously only applied to premises selling alcohol). Premises only serving hot non-alcoholic drinks are excluded (an important and we feel, enlightened, approach).

The GLA may consider lobbying for LNL legislation to be further altered to reflect the relative 'risk' presented by venues, incorporating venue capacity and differentiated scale for closing times (between midnight and 06:00) into the fees charged to particular businesses, rather than a single cost for all venues remaining open after midnight (as discussed in the IAS/FARE report previously mentioned).²⁸ Risk assessment scaling could also be informed by the results of Cardiff Model / ISTV data-sharing, as to the key locations for alcohol-related assaults. One common criticism of area-wide powers such as LNL is that they are blunt instruments, which fail to differentiate between different licensed premises. Venue risk assessments combining ISTV data with other indicators would allow more targeted use of public resources and could be combined with reduced Levy payments or exemptions for lower-risk premises. IAS believes such approaches are likely to improve the effectiveness of LNLs and encourage their wider uptake in London and elsewhere.

IAS believes that the initial signs of LNL's success as a tool of public protection are positive; however, firm evidence as to associated reductions in alcohol-related harms are lacking. The

²⁶ Mayor of London. n.d.. Contact and Access. Retrieved from: <https://www.london.gov.uk/what-we-do/research-and-analysis/people-and-communities/strategic-crime-analysis/contact-and-access>. Accessed 8 February 2018.

²⁷ Mayor of London. n.d.. Information Sharing to Tackle Violence. Retrieved from: <https://www.london.gov.uk/what-we-do/mayors-office-policing-and-crime-mopac/data-and-statistics/information-sharing-tackle>. Accessed 8 February 2018.

²⁸ Foster, J., Harrison, A., Brown, K., Manton, E., Wilkinson, C., and Ferguson, A. 2017. Anytime, Anyplace, Anywhere?. Retrieved from: <http://www.ias.org.uk/uploads/pdf/IAS%20reports/rp25052017.pdf>. Accessed 8 February 2018. pp. 24-8.

schemes should be subject to rigorous independent evaluation, alongside the various industry-funded 'best practice' schemes. Corporate Social Responsibility schemes, such as Purple Flag, are used in conjunction with LNLs, or as an alternative to LNLs and are widely promoted; they have not, however, been independently evaluated despite being in existence, in some cases, for over a decade.

Alcohol-related harms can be reduced through greater use of licensing advice, warnings and review proceedings for licensed retailers in the off- and on-trade. Home Office statistics on alcohol and late-night refreshment licensing released in October 2017 show that nationally, 600 reviews were completed for premises thought to be causing problems aligned to the licensing objectives, a decrease of 14% from the previous year, as part of a decline in reviews of more than 50% from 1,300 in 2010 when the data collection began.²⁹ Why the number of reviews has declined so dramatically can only be speculated upon. Whether the continued pressure seen on Local Authority and police budgets resulting in fewer licensing roles and resources has been a significant factor is hard to determine, as is any link to overall downward trends in violent crime, or possible improvements in operator practices. An informative debate between experts as to possible reasons for the decline was recently published on the Alcohol Policy UK blog.³⁰

IAS would urge local partnerships and licensing professionals to take note of the issues raised in this debate. Harm reduction partnerships in London must ensure that any pattern of reductions in the number of reviews is not due to regulatory inactivity, as there will continue to be a need to challenge and occasionally to 'weed out' bad operators.

There is potential for using Statements of Licensing Policy and specifically Cumulative Impact Policies more strategically to shape night-time development, for example, through the use of 'Core Hours' policies which restrict new alcohol-led ventures after midnight, whilst permitting new ventures which have a different 'functionality'. This would have the positive effect of diversifying the late-night economy in ways that help promote the Licensing Objectives.

Community involvement in licensing and planning proposals that potentially affect residents and local 'quality of life' should be enhanced. Residents should be provided with access to legal resources and advice to ensure that they are fully included and informed and can meaningfully engage with these locally impactful processes.

In locations where issues associated with public drunkenness remain chronic, local partnerships across London may seek to develop sustainable funding vehicles such as Late-Night Levy or BIDs where money and expertise is used to support AIMS, street warden/pastor type-patrols and other forms of place management to support public safety and security. These additional 'eyes on the street' would also assist with the prevention of terrorism, street robbery and other forms of serious crime.

Question 4. What are the opportunities for London's night time economy? In other words, how

²⁹ Alcohol Policy UK. 2017. Licensing figures 2017: premises called to review - why the decline? Retrieved from: <http://www.alcoholpolicy.net/2017/10/licensing-figures-2017-premises-to-review-why-decline.html> Accessed 19 February 2018.

³⁰ Alcohol Policy UK. 2017. What's behind declining licensing reviews? Expert opinions. Retrieved from: <http://www.alcoholpolicy.net/2017/11/declining-licensing-reviews-expert-opinions.html>. Accessed 8 February 2018.

could London improve its night time offer? What should we be looking to develop?

More active promotion of diverse entertainment offers and evening/night-time retail.

Annual programme of public events in central areas and urban centres with joined-up promotion.

Improved street lighting and more CCTV at bus stops.

Planning and licensing to support the establishment of non-alcoholic and non-takeaway social spaces after 23:00 hrs, especially in current 'hot spots'.

Ways to encourage and reward existing alcohol-led venues to re-model their business plans and broaden their appeal by diversifying the core functionality of what they do (not merely 're-branding' themselves as restaurants/café bars in order to receive more favourable licensing conditions).

Question 5. What innovations, or ideas from other cities, would make London better at night? This might include commercial opportunities, ideas for events or marketing, initiatives to protect residents, visitors or workers, or ways to improve standards. If you have examples of good practice, we would like to know about them.

The two-night 'Light Night' festival in Leeds is now in its 14th year, with proven success in attracting new audiences to the city at night; principally families with young children and teenagers.^{31, 32}

Question 6. In July, the Mayor published his Vision for London as a 24-Hour City. It contains ten principles for the development of London at night. What do you like or not like about the vision? Are the ten principles right? What would you add or exclude, and why?

London at night will:

1. Be a global leader.
2. Provide vibrant opportunities for all Londoners, regardless of age, disability, gender, gender identity, race, religion, sexual orientation or means.
3. Promote all forms of cultural, leisure, retail and service activity.
4. Promote the safety and wellbeing of residents, workers and visitors.
5. Promote welcoming and accessible nightlife.
6. Promote and protect investment, activity and entrepreneurship.

³¹ BBC News. 2017. Leeds lit up by 13th annual Light Night spectacle. Retrieved from: <http://www.bbc.co.uk/news/uk-england-leeds-41525510>. Accessed 8 February 2018.

³² Families Online. 2017. What's On: Light Night Leeds 2017 for Families. Retrieved from: <https://www.familiesonline.co.uk/local/leeds/in-the-know/whats-on-light-night-leeds-2017-for-families>. Accessed 8 February 2018.

7. Promote domestic and international visits to London.
8. Be strategically located across London to promote opportunity and minimise impact.
9. Become a 24-hour city that supports flexible lifestyles.
10. Take account of future global and domestic trends in leisure, migration, technology, employment and economics.

Responses:

Principle 3: Promoting ‘all forms’ of cultural, leisure, retail and service activity could be problematic if the form in question threatens the success of pursuing the other visions for the city. Discovering what not to promote would become apparent following the type of evidence-based risk-assessment suggested in answer to Q.3 above. However, experience suggests this is likely to be ‘alcohol-focused/alcohol-led’ activities in the midnight-06:00 period.

Principles 4 and 9: It is not sufficient to merely promote the ‘safety and wellbeing’ of residents, workers and visitors and to support flexible lifestyles. It would be more ambitious and appropriate to support the city as a liveable place for families, workers and visitors.

Suggested Principle:

Promote the natural and physical environment of London by maintaining clean air, clean streets and reducing noise and light pollution.

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