



Public Health
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

Direct Line: 020 8545 4834

Date: 01/11/2017

To: Licensing Department
London Borough of Merton
Merton Civic Centre
London Road
Morden SM4 5DX

**Re: Application to Vary the Premises Licence under the Licensing Act 2003
Morden Food Centre 17 Morden Court Parade Morden Surrey SM4 5HJ – Premises Licence No.
LN/000002629**

The application received seeks to extend the sale by retail of alcohol for consumption off the premises, and to extend the opening and closing times allowing for the premises to open over a seven day period as follows:

Monday to Thursday 07:00 to 02:00 hours

Friday and Saturday 07:00 to 03:00 hours

Sunday 08:00 to 00:00 (midnight).

The current hours for the sale by retail of alcohol for consumption off the premises, and the opening and closing times on premises licence LN/000002629, are as follows:

Sale by Retail of Alcohol and Opening and Closing Times

Monday to Saturday 08:00 to 00:00 (midnight).

Sunday 09:00 to 23:00 hours.

As a responsible authority under 2012 amendment to the Licensing Act 2003, the Director of Public Health for Merton wishes to make representation to the application on all four licensing objectives:

- 1. The prevention of crime and disorder**
- 2. Public safety**
- 3. Prevention of public nuisance**
- 4. The protection of children from harm**

Tackling alcohol misuse is central to achieving the outcomes in Merton's Health and Wellbeing Strategy: giving every child a healthy start in life, supporting people to improve their health, improving wellbeing, resilience and connectedness, and reducing the gap in life expectancy between the east and west of the borough. We want to create an environment and a culture in the borough that prevents problem drinking from starting and provides early help for people who are struggling. One of the ways we will be doing this is ensuring health and wellbeing considerations are presented for consideration in licensing decisions, in order to tackle alcohol-related crime and anti-social behaviour, ensure public safety and prevent harm to children.

The Merton Joint Strategic Needs Assessment (JSNA) chapter on alcohol sets out a summary of the available evidence on alcohol-related behaviours and consequences, as background to the importance of tackling alcohol effectively in the borough: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

1. The prevention of crime and disorder

Local data attached in the appendix reveals the following:

- 'Alcohol Related Issues' within 100m of the premises postcode was ranked in the top 20% for the borough.
- The ward in which the premises is located (Merton Park) ranked 5th out of 20 wards in the borough for ambulance-treated alcohol-related illness in adults.

This data suggests an existing significant impact of alcohol consumption in the local area. While the above data does not relate to these specific premises, it is likely that the granting of this variation as requested, particularly the increase in hours where alcohol will be sold, will contribute to the above trends relating alcohol to crime and disorder.

National and international scientific evidence shows the following:

- Overall, more alcohol is consumed when it is easily available.¹
- An increase in alcohol sales is strongly linked to an increase in drinking-related damage, for instance injuries and assaults.²
- Harmful use of alcohol is a major contributor to violence: alcohol use commonly precedes aggressive behaviour, and harmful drinking is associated with being both a perpetrator and a victim of violence³
- Reducing the availability of alcohol through regulating sales outlets, hours and prices can substantially decrease violence.³

2. Public Safety

Data on assaults, violence, and knife and gun injuries attached in Appendix 1 paint a picture of the impact of alcohol consumption in this specific area on both public safety and nuisance.

¹ Alcohol Concern UK (2012) Response to The Government's Alcohol Strategy (March 2012)

² Popova et al 2009, Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol & Alcoholism* Vo. 44, No. 5, pp. 500-516

³ WHO 2009 Preventing violence by reducing the availability and harmful use of alcohol

3. Prevention of public nuisance

- 'Alcohol-related disturbance reported by TFL': Merton Park was ranked 4th out of 20 wards for this, and 2nd out of 20 wards for 'BTP-reported drunken behaviour'. The Northern line joined the Night Tube in November 2016, and the premise in concern is located less than 200m away from Morden tube station. The extension of its opening hours up to 3 am on Friday and Saturday means alcohol would be available to those coming off the tube, thereby potentially encouraging them to stay out longer and continue drinking. This would further exacerbate the pre-existing issues highlighted above.

4. The protection of children from harm

In younger people, risky drinking behaviour is associated with anti-social behaviour and teenage conceptions⁴ .

Out of 20 wards, the premises' ward is ranked 5th in the borough for alcohol illness treated by London Ambulance Service in underage drinkers (ages 8-17). The premises is located in the top 30% of areas in the borough for schools within 100m-500m, and is likely to be on the route to and from school for many children.

Conclusion

The applicant states a number of steps they will take to promote the licensing objectives; however we believe that these will not be sufficient to prevent an additional impact of the proposed change in licence on pre-existing the levels of alcohol-related crime and disorder and issues around public safety already seen in the area.

Therefore we would recommend that the Committee reject the application for a variation to this premise licence.

Yours sincerely,

Dr Rooah Omer

On behalf of Dr Dagmar Zeuner, Director of Public Health Merton

⁴ Merton JSNA: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

Appendix 1

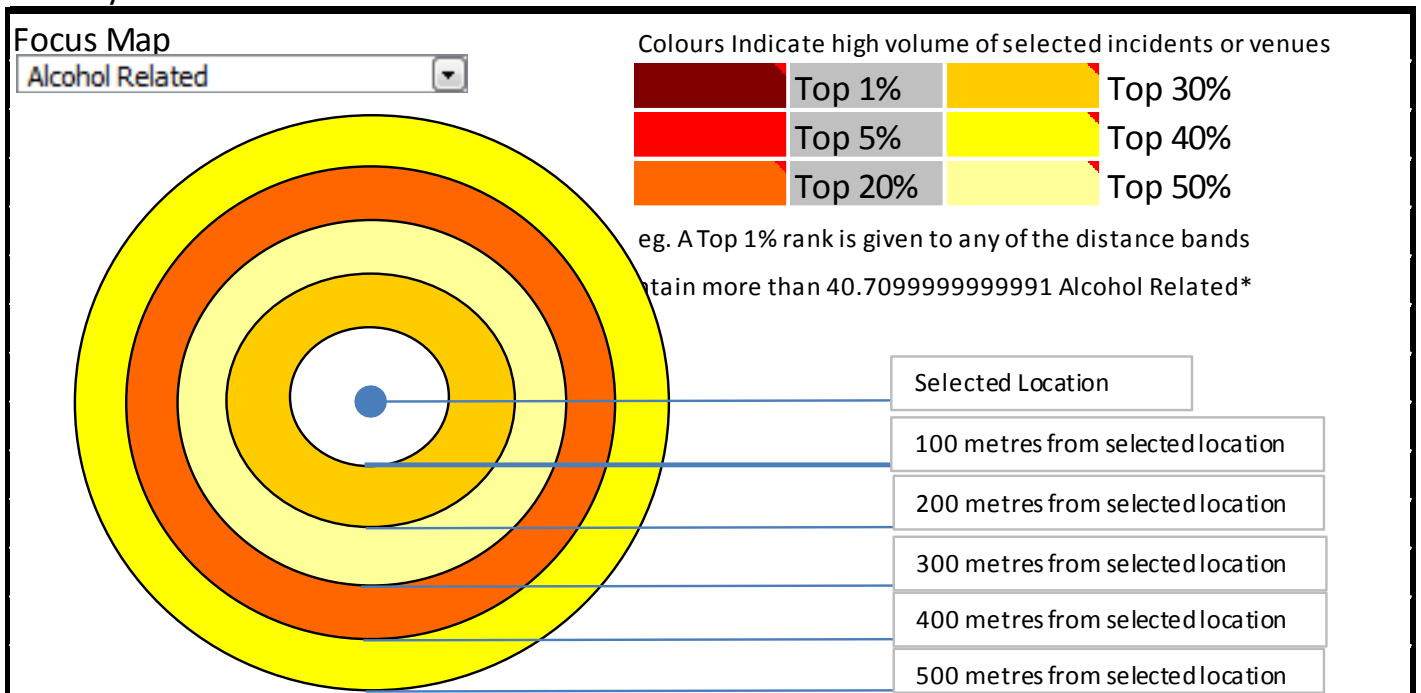
MERTON 'Traffic Light Dashboard' to: October 2015

PREVENTION OF CRIME AND DISORDER	
AMBULANCE DATA	
RANK ALL ASSAULTS 14 out of 20 wards	RANK SEXUAL ASSAULTS 7 out of 20 wards
RANK ALL WEAPON INJURIES 12 out of 20 wards	RANK KNIFE INJURY 5 out of 20 wards
RANK GUN INJURIES 1 out of 20 wards	RANK VIOLENCE AGAINST AMBULANCE CREW 15 out of 20 wards

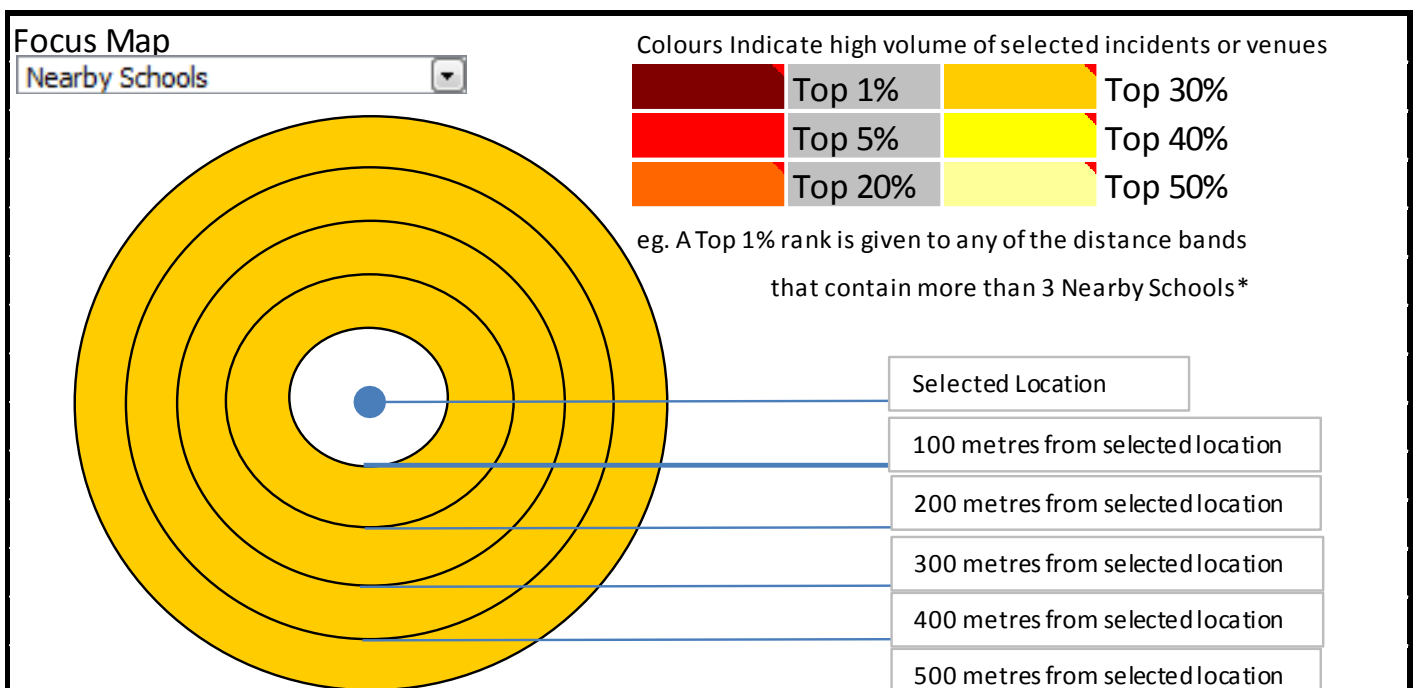
ALCOHOL ILLNESS TREATED BY LONDON AMBULANCE SERVICE		
ambulance data		
AGED 8 - 17 5 out of 20 wards	AGED 18 - 25 6 out of 20 wards	
AGED 26 - 39 7 out of 20 wards	AGED 8 - 39 7 out of 20 wards	AGED 18+ 5 out of 20 wards

PUBLIC TRANSPORT ALCOHOL RELATED INCIDENTS	
BTP DRUNKEN BEHAVIOUR 2 out of 20 wards	TFL ALCOHOL RELATED DISTURBANCE 4 out of 20 wards

Bullseye' Indicators



Date range of Analysis: Year to October 2015.



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