

COMMUNITY AND HOUSING DEPARTMENT

Department of Public Health

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

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

Direct Line: 020 8545 4577
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Date: 22/08/2018

Re: Application for a Premises License under the Licensing Act 2003- Time in RO, 20-22 Abbotsbury Road, Morden, London, SM4 5LQ

License Number	WK/201804508
License Type	On license
Ward	Ravensbury

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

1. **The Prevention of Crime and Disorder**
2. **Public Safety**
3. **Prevention of Public Nuisance**
4. **The Protection of Children from Harm**

The applicant is seeking to sell alcohol (on the premises) from 08:00-22:00hrs Mon-Thu, 08:00-04:30hrs Fri, 08:00-05:00hrs Sat and 08:00-01:00hrs Sun. Public Health is concerned about this application to sell alcohol on the premises for the following reasons:

- Public health data shows some areas for concern within the premises postal code
- Proximity of the premises to public spaces that are valued by Merton residents

Introduction and Background

Tackling alcohol misuse is central to achieving the outcomes in Merton's Health and Wellbeing Strategy.

A crucial element of tackling alcohol-related harm is ensuring that health and wellbeing considerations are met by premises licensed to sell alcohol within the borough, in order to prevent alcohol-related crime and anti-social behaviour, ensure public safety, and prevent harm to children.

Alcohol misuse is currently one of the biggest Public Health issues in the U.K., and it imposes a huge burden on our society.



Irresponsible drinking costs the taxpayer a staggering **£21 billion a year**.¹



Alcohol is currently the **biggest risk factor** for death, ill-health, and disability among 15-49 year olds in the UK.²



The cost of alcohol-related conditions to the NHS is **£3.5 billion** annually.³



Alcohol is a contributing factor in **75% of stabbings**, and **60-70% of murders**.⁴

¹ Home Office, 2012.

² . Strang, J., Drummond, C., McNeill, A. et al (2014) Addictions, dependence and substance misuse
In: Davies, S Annual Report of the Chief Medical Officer 2013: Public Mental Health priorities:
investing in the evidence.

³ <https://www.alcoholconcern.org.uk/alcohol-statistics>. Accessed April 2018

⁴ British Medical Association (BMA)

Evidence of detrimental impact on the licensing objectives

1. The prevention of crime and disorder

The link between alcohol and violence has been recognized as far back as the 4th century BC. Alcohol-related violence causes substantial injury and death.⁵

Local data suggests there is a serious issue with crime and violence in the area surrounding the premises postcode.

Within **100m** of the premises postcode, SM4 5LQ,

- Ambulance recorded assaults fall in the **top 50%** of the borough

Within **200m** of the premises postcode, SM4 5LQ,

- Head injuries incidents fall in the top **40%** of the borough
- Bus driver reported anti-social behaviour (ASB) falls in the **top 5%** of the borough
- BTP ASB falls in the **top 20%** of the borough
- BTP criminal damage falls in the **top 5%** of the borough
- Bus driver reported violence falls in the **top 5%** of the borough
- BTP violence falls in the **top 5%** of the borough

The above data suggests there is a significant impact of alcohol consumption in the local area. While the above data does not relate to the specific premise, any premises that supplies alcohol in the area will be contributing to the trends relating alcohol to crime and disorder.

2. Public safety

- The recent [Annual Residents Survey for Merton](#) (2017) highlights that:
 - 19% of residents in this area of the borough are very worried or fairly worried about people being drunk and rowdy in public places;
 - 28% are very concerned or fairly concerned about groups hanging around in the streets; and

⁵ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3170096/#R2>

- 18% of residents are very concerned or fairly concerned about people using or dealing drugs.⁶
- The recent Annual Residents Survey for Merton (2017) also highlights that crime is the second highest issue (after gangs) that young people in Merton are personally most concerned about, with almost a quarter (24%) of young people citing it as an issue.
- In terms of alcohol harm overall, in 2012 Merton ranked 55 out of 326 local authorities and was in the higher percentiles for:
 - Male mortality chronic liver disease (104/326)
 - Female alcohol-specific hospital admissions (106/326)
 - Male alcohol-specific hospital admissions (109/326)
 - Male alcohol-attributable hospital admissions (151/326)
 - Alcohol-related violent crimes (192/326)
 - Alcohol-related sexual offences (208/326)⁷
- Within the borough, there is an element of variance in the degree of alcohol harm between different wards. Ravensbury where this premises is located, has a higher admission ratio of hospital stays for alcohol-related harm than the figure for Merton and that for London.⁸
- The crime rate in Ravensbury is 70.7 offences per 1,000 population in 2017. This is higher than the Merton value, which is 65.1 offences per 1,000 population. The highest number of offences recorded is 'violence against the person'.⁹

3. Prevention of public nuisance

- The recent [Annual Residents Survey for Merton](https://www2.merton.gov.uk/residents_survey_research_report_2017.pdf) (2017) highlights that **22%** of residents in Ravensbury, where this premises postcode is located, are very concerned or fairly concerned about noisy neighbours or loud parties in the area.
- The premises location is 0.2 miles (about a 3 minute walk) from Morden Station, the last stop of one of five London tube lines which run a 24-hour service on Fridays and Saturdays. This poses a serious public nuisance risk as Morden Town Centre is mostly residential and yet this current application could lead to more antisocial behaviour and crime, already a serious issue in the area.

4. The protection of children from harm

The creation of healthy places is crucial to ensuring future generations have the best possible chance at a healthy future. This is not only essential for individual wellbeing, but also for society as a whole. A healthy place means an environment that makes the healthy choice the easy choice (for example, limiting fast food outlets and sales of alcohol near

⁶ https://www2.merton.gov.uk/residents_survey_research_report_2017.pdf

⁷ <https://www2.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

⁸ https://www2.merton.gov.uk/ravensbury_ward_health_profile.pdf

⁹ https://www2.merton.gov.uk/ravensbury_ward_health_profile.pdf

schools and public spaces), and that protects children from being exposed to antisocial behaviour and crime on their streets and public transport. However:

- Compared to Merton, Ravensbury, where the premises postcode is located, has a higher proportion of young people (aged 10-24 years), who must be protected from alcohol- related harm¹⁰
- The premises postcode, SM4 5LQ is a short 4 minute walk (0.2 miles) from Morden Hall Park, a large public open space frequented by children, young people and older people

Conclusion

There is evidence revealing serious concerns about alcohol harm in the local population, and the location of the premises in concern is that which serves potentially vulnerable individuals. Therefore, we request that the application for a premises license WK/201804508 be rejected.

Yours Sincerely,
Natalie Lovell

Signed electronically
Natalie Lovell
Healthy Places Officer
On behalf of Dr Dagmar Zeuner, Director of Public Health

¹⁰ https://www2.merton.gov.uk/ravensbury_ward_health_profile.pdf

APPENDIX



All Infographics on page 2 from Noun Project artists, accessed at <https://thenounproject.com/>

Credits:

£ icon by Chameleon Design

Heart icon by Ben Davis

Criminal icon by Bakunetsu Kaito

Ambulance icon by dDara