

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
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Date: 12/11/2018

Re: Application for a Premises License under the Licensing Act 2003- Convenience store, 37-39 Upper Green East, Mitcham, London, CR4 2PF

License Number	WK/201807603
License Type	Off license
Ward	Figges Marsh

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 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 (off the premises) from 07:00 to 01:00 Monday to Thursday, 07:00 to 02:00 Friday to Saturday and 07:00 to 01:00 Sunday. Public Health is seriously concerned about this application to sell alcohol off the premises for the following reasons:

- The premises is located within a Cumulative Impact Zone, an area which has been identified by the Council as presenting serious issues regarding crime and anti-social behavior from street drinkers.
- The applicant is seeking to sell alcohol from very early in the morning into the early hours of the following day which will have negative impacts on the public's health and on the potentially positive effects that the surrounding neighbourhood can have on people's wellbeing and health.

- Public health data shows areas for concern within the premises postal code

Introduction and Background

Tackling alcohol misuse is central to achieving the outcomes in Merton’s Health and Wellbeing Strategy. Merton’s Health and Wellbeing Strategy is currently being refreshed and the Health and Wellbeing Board have agreed four overarching themes of: Start Well; Live Well; Age Well; in a Healthy Place. The Healthy Place theme is an integral part of the first three themes, and the aim is to focus on what a healthy place looks like that will help individuals and communities in Merton to flourish and live healthy lives.

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, CR4 2 PF

- Bus driver reported violence falls in the **top 5%** of the borough
- Bus driver reported anti-social behaviour falls in the **top 20%** of the borough
- Gun, knife and weapon injuries fall in the **top 30%** of the borough
- Head injuries fall in the **top 30%** of the borough
- Ambulance recorded assaults fall in the **top 40%** of the borough

Issues with crime and violence continue to occur in the wider area surrounding the premises postcode CR4 2PF. For example, between 200m and 300m of the postcode

- Bus driver reported anti-social behaviour falls in the **top 5%** of the borough
- Bus driver reported violence falls in the **top 5%** of the borough
- Alcohol related incidents fall in the **top 20%** of the borough
- Gun, knife and weapon injuries fall in the **top 30%** 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

There is evidence of serious neighbourhood issues in the area in which the applicant is seeking a premises license; residents living in this area are significantly more likely to report noisy neighbours, loud parties, people using or dealing drugs and groups hanging out in the streets.

- The recent [Annual Residents Survey for Merton](#) (2017) highlights that 17% of residents in this area of the borough are very worried or fairly worried about people being drunk and rowdy in public places. 23% are very concerned or fairly concerned about groups hanging around in the

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

streets, and 15% 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.
- Within the borough, there is an element of variance in the degree of alcohol harm between different wards. Figges Marsh, 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.**⁷
- The crime rate in Figges Marsh is 95 offences per 1,000 population in 2017. This is higher than the Merton value, which is 65 offences per 1,000 population.⁸ The highest number of offences recorded is 'violence against the person'.

3. Prevention of public nuisance

- The premises in concern are located in the **Cumulative Impact Zone (CIZ)** of Mitcham Town Centre; an area where it is recognised that there is a problem with the impact of alcohol on public nuisance, particularly with regard to street drinking.

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

- The premises postcode, CR4 2PF, is within walking distance of at least two schools, including St Mark's Primary School and St Thomas of Canterbury Catholic Primary School, and is likely to be on the route to and from school for children.
- The premises postcode, CR4 2PF is a short 5 minute walk (0.2 miles) from Mitcham Common, a large public open space frequented by children, young people and older people.
- The population of Figges Marsh is different to other wards in Merton in that there are a higher proportion of young people (0-29 years) living in the area.

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

⁷ https://www2.merton.gov.uk/figges_marsh_ward_health_profile.pdf

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

Conclusion

There is strong 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/201807603 be rejected.

Yours Sincerely,

Natalie Lovell

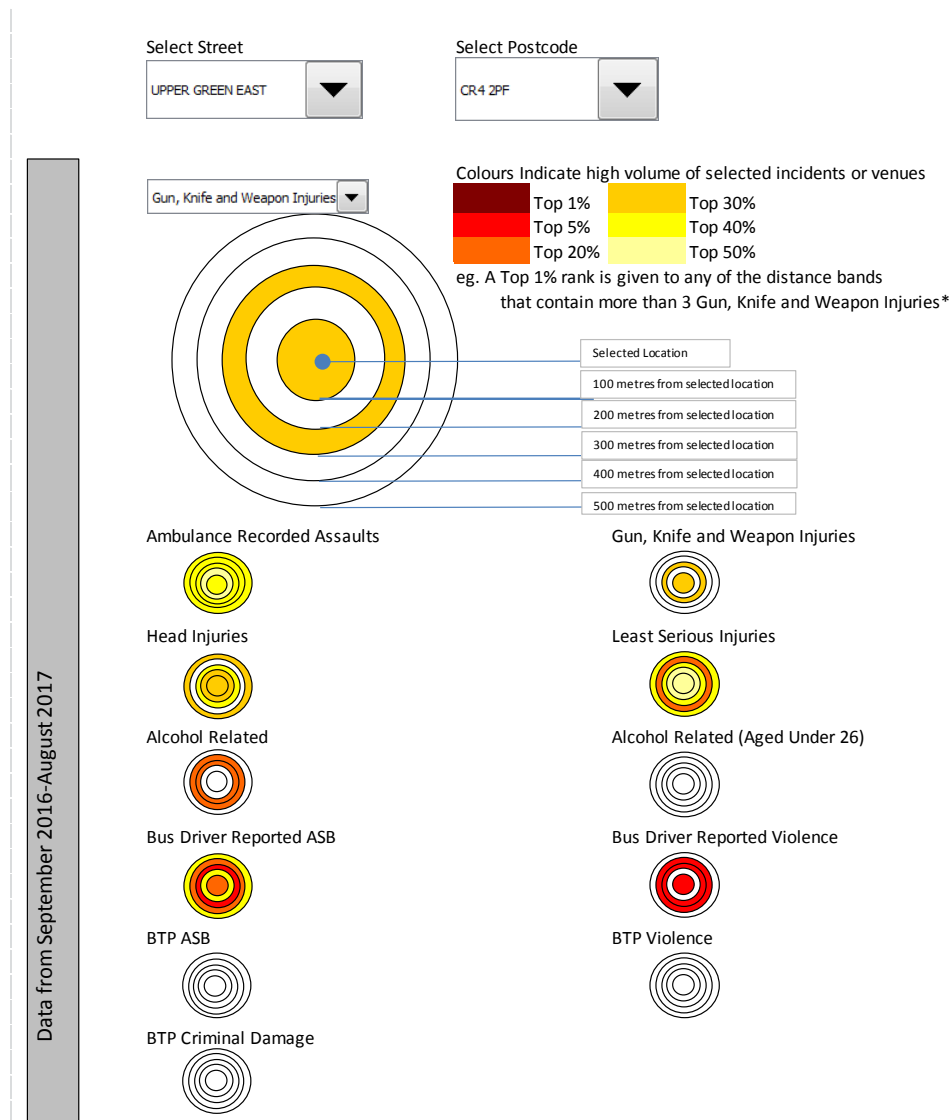
Signed electronically

Natalie Lovell

Healthy Places Officer

On behalf of Dr Dagmar Zeuner, Director of Public Health

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