

Cumulative Impact Analysis

1. Introduction

Cumulative Impact is defined as the potential impact on the promotion of the licensing objectives of a number of licenced premises concentrated in one area. In some areas where the number, type or density of licensed premises is high, or exceptional, serious problems of nuisance, crime or disorder may occur within or some distance away from the area.

A Cumulative Impact Assessment may be published by a Licensing Authority to help it to limit the number or type of applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives.

The Policing and Crime Act 2017 sets out what a licensing authority must do in order to publish a cumulative impact assessment (CIA). This includes publishing the evidential basis for its opinion and consulting on this evidence. A cumulative Impact Assessment must be published, and consulted upon, every three years. The evidence underpinning the publication of the CIA must be suitable as a basis for a decision to refuse an application or impose conditions.

The evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the particular problems identified in the specific area to be covered by the CIA. The Secretary of State's Guidance provides a list of Information which licensing authorities may be able to draw on when considering whether to publish a CIA including

- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
- statistics on local anti-social behaviour offences;
- health-related statistics such as alcohol-related emergency attendances and hospital admissions;
- environmental health complaints, particularly in relation to litter and noise;
- complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
- residents' questionnaires;
- evidence from local and parish councillors;
- evidence obtained through local consultation;
- Underage drinking statistics.

This report lays out the evidence underpinning the proposal to:

- retain the two existing cumulative impact areas, Wimbledon Town Centre and Mitcham Town Centre;
- remove the existing zone, Wimbledon Village, from the Assessment

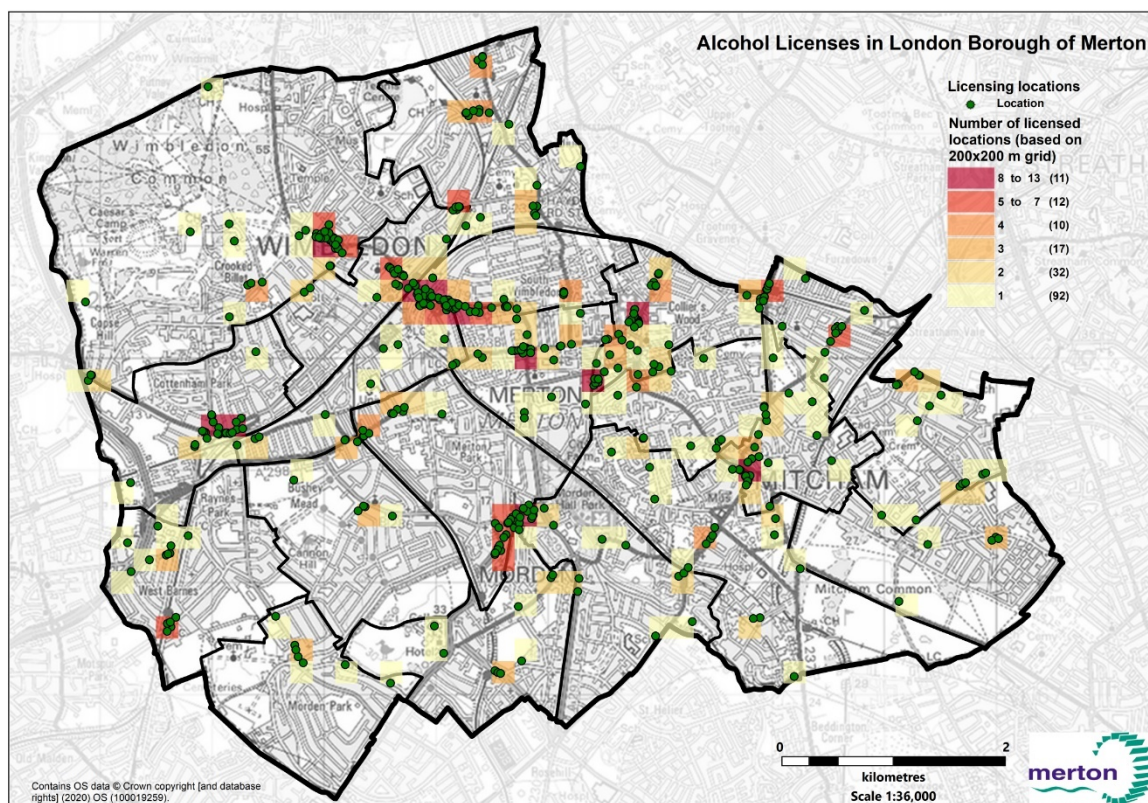
- not include any other area of the borough in the Cumulative Impact Assessment at this time.

2. Council Wards



3. Licensed premises

There are currently 426 licensed premises in Merton. The borough has five main commercial centres; Colliers Wood, Mitcham, Morden, Raynes Park and Wimbledon. From the map it can be seen that the highest concentrations of licensed premises lie within these commercial centres with Wimbledon commercial centre having the most licensed premises in the borough. However, it should be noted that not all these premises have licences to sell alcohol, some may be licensed to sell hot food only after 23.00 hours or to provide only public entertainment. A more detailed analysis of the number and type of licensed premises in each of the three existing Cumulative Impact Zones are shown later.



4. Residents Survey 2019

The London Borough of Merton carried out a survey of 1,000 local residents aged 18+ and 271 young people aged 11-17 between February 4th and April 5th, 2019. The survey explored resident perceptions of their local area and council services and, amongst other matters, measured perceptions of the local safety, levels of anti-social behaviour, and community cohesion within the borough.

The survey results show that most Merton residents are satisfied with their local area as a place to live both during the day (98%) and at night (84%). Feelings of safety in local areas after dark and during the day remain relatively high. There has been an increase, since the previous survey carried out in 2017, in residents perceiving people using or dealing drugs as a problem (11% to 20%) but decrease in people being drunk or rowdy in public spaces (17% to 13%)

Responses to the question: How safe or unsafe do you feel when outside in your local area...?		
Proportion feeling unsafe by ward		
Ward	% feeling unsafe after dark	% feeling unsafe during the day
Abbey	1	0
Cannon Hill	0	0
Colliers Wood	13	2
Cricket Green	0	0
Dundonald	0	0
Figges Marsh	10	4
Graveney	17	0
Hillside	0	0
Lavender Fields	2	0
Longthorton	16	0
Lower Morden	0	0
Merton Park	12	2
Pollards Hill	10	2
Ravensbury	0	2
Raynes Park	0	0
St Helier	7	0
Trinity	3	0
Village	4	0
West Barnes	16	0
Wimbledon Park	0	0

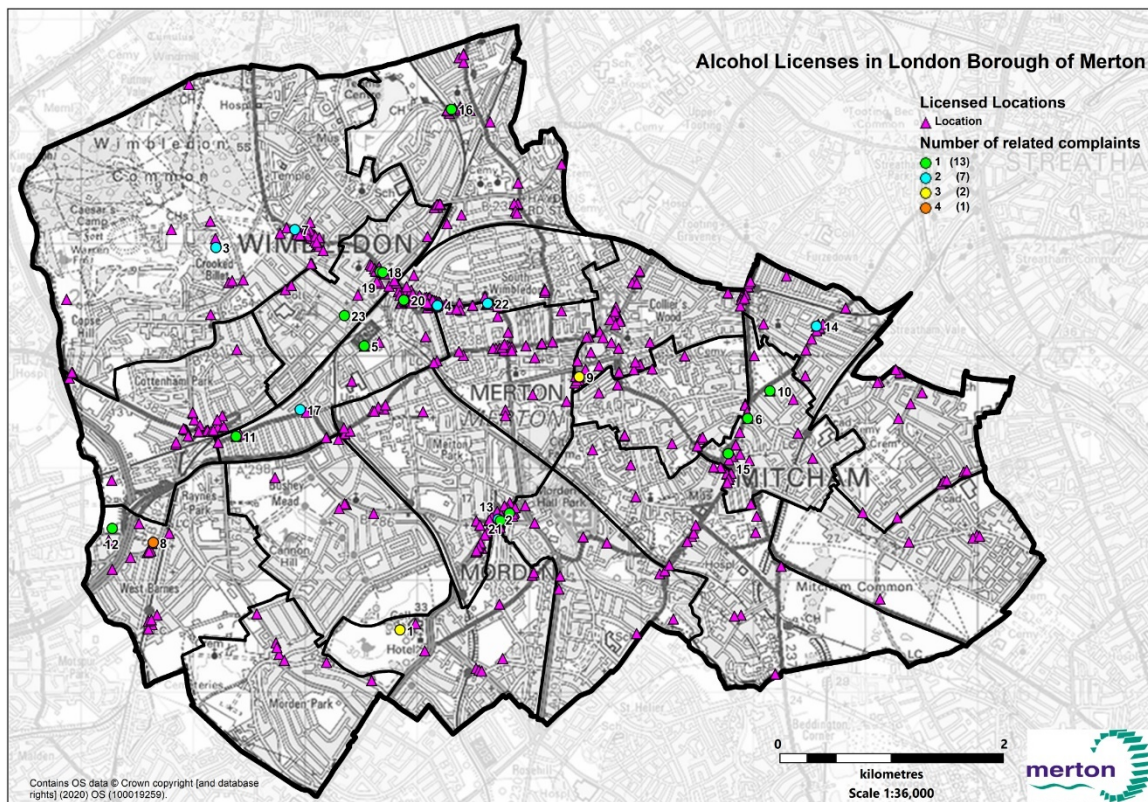
Responses to the question: Thinking about the area how much of a problem do you think each of the following is?			
Ward	Anti-social behaviour	People drunk or rowdy in public places	Groups hanging around the streets
Abbey	19	30	19
Cannon Hill	0	0	0
Colliers Wood	14	17	19
Cricket Green	25	2	5
Dundonald	12	0	6
Figges Marsh	21	27	20
Graveney	38	39	34
Hillside	11	4	10
Lavender Fields	41	13	14
Longthorton	26	13	13
Lower Morden	18	15	9
Merton Park	18	10	33
Pollards Hill	11	4	9
Ravensbury	45	37	35
Raynes Park	4	1	0
St Helier	22	19	25

Trinity	11	15	20
Village	9	0	14
West Barnes	14	3	10
Wimbledon Park	20	1	6

Residents living in Cannon Hill, Raynes Park and Village report fewer problems with anti-social behaviour, people being drunk and rowdy and groups hanging around their streets than residents living elsewhere. Residents of Graveney, Ravensbury, Abbey and Figges Marsh report the highest levels of concern about people being drunk or rowdy in public places.

5. Noise and other complaints relating to licensed premises

Between March 2019 and April 2020 Merton Council received 37 complaints relating to 23 licensed premises or events in the borough. The number of complaints is low and generally confirms the view that the majority of residents in the borough are satisfied with the licensing arrangements in the borough.



6. Trading Standards – Test Purchases

Between April 2019 and January 2020 Merton Trading Standards conducted 56 test purchases across the borough for alcohol and tobacco sales. In 8 cases a sale of alcohol was made to a young person without any request for identification. All test purchases are carried out in premises selling alcohol for consumption off the premises.

7. Ambulance call outs

The number of alcohol –related ambulance callouts in Merton varies by time of day. Ambulance callouts for alcohol peaks between 6 and 7 pm and again between 11pm and midnight, whilst ambulance callouts for assaults begin to see an upward trend from 5pm and peak between 10pm and 11pm. Calls significantly drop off after 2am. There appears to be a strong link between ambulance call outs and hours granted for the sale of alcohol.

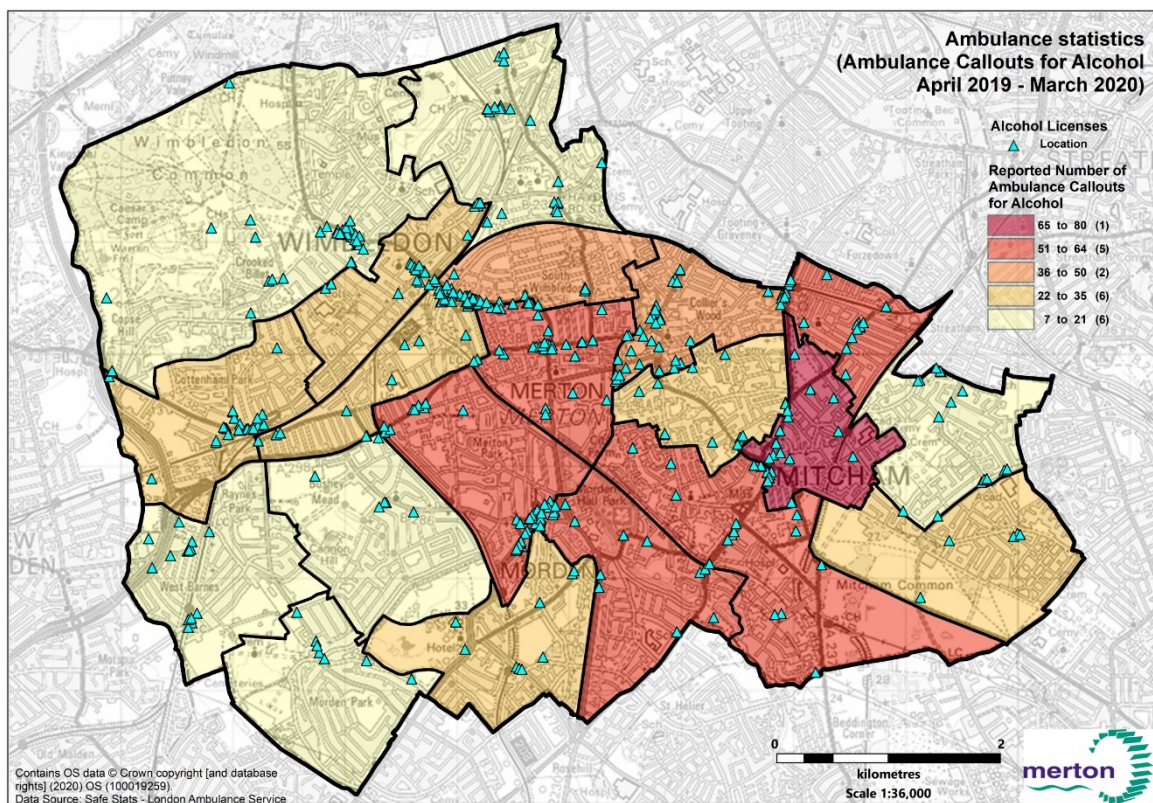
Figges Marsh, Abbey, Cricket Green, Graveney, Merton Park, Ravensbury and Trinity Wards have the highest ambulance call outs for alcohol, with Figges Marsh Ward having the highest level of ambulance callouts for assaults.

Ambulance callouts for alcohol (Paramedic derived only)

Time Period: April 19 - March 20

Data Source: London Ambulance Service via SafeStats

Paramedic derived



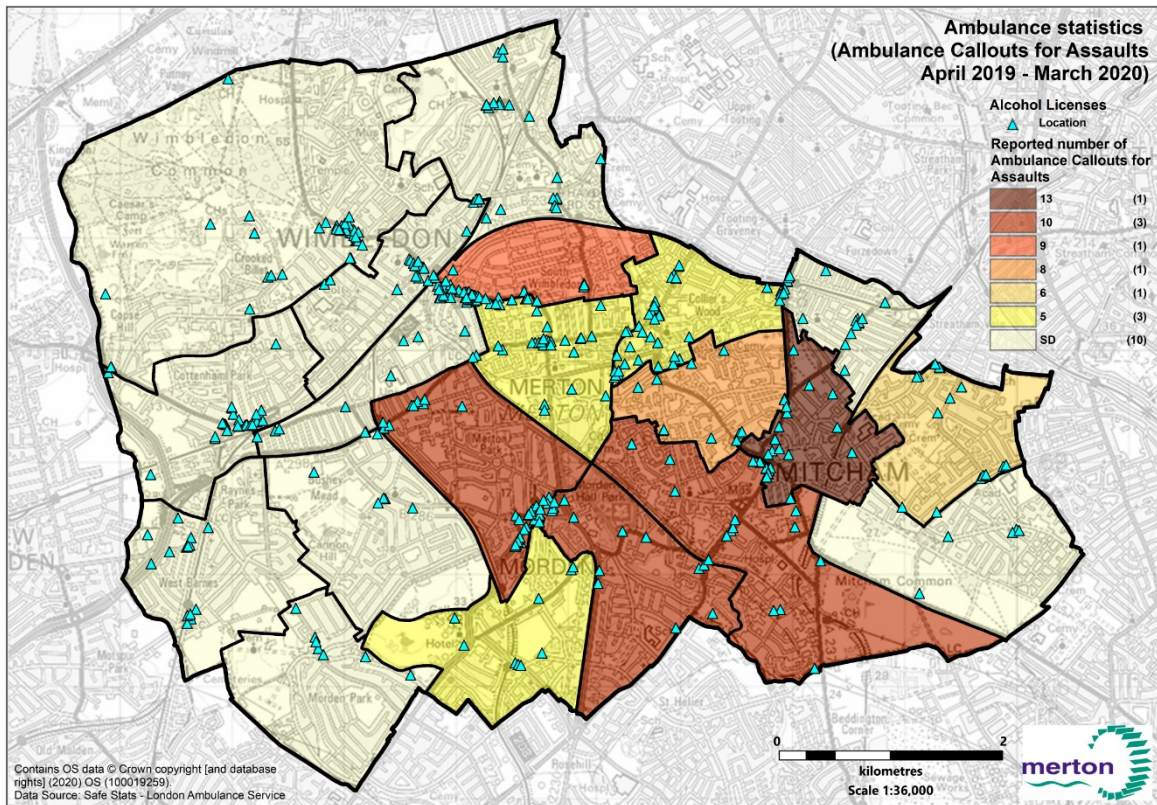
Ward Name	Count
Abbey	57
Cannon Hill	12
Colliers Wood	43
Cricket Green	54
Dundonald	24
Figge's Marsh	80
Graveney	52
Hillside	32
Lavender Fields	23
Longthornton	16
Lower Morden	7
Merton Park	52
Pollards Hill	30
Ravensbury	52
Raynes Park	22
St. Helier	27
Trinity	50
Village	21
West Barnes	11
Wimbledon Park	18

From 8am paramedic derived calls for alcohol begin to rise, peaking between 6-7pm with 50 calls and again between 11pm and 12am with 48 calls. Calls drop significantly after 2am.

Ambulance callouts for assaults (Caller derived)

Time Period: April 19 - March 20

Data Source: London Ambulance Service via SafeStats



SD= Supressed figure as it is less than 5

Ward Name	Count
Abbey	5
Cannon Hill	SD
Colliers Wood	5
Cricket Green	10
Dundonald	SD
Figge's Marsh	13
Graveney	SD
Hillside	SD
Lavender Fields	8
Longthornton	6
Lower Morden	SD
Merton Park	10
Pollards Hill	SD
Ravensbury	10
Raynes Park	SD
St. Helier	5
Trinity	9
Village	SD
West Barnes	SD
Wimbledon Park	SD

Caller derived assaults begin to see an upward trend from 5pm and peak between 10pm and 11pm with 13 calls. Calls significantly drop off after 2am.

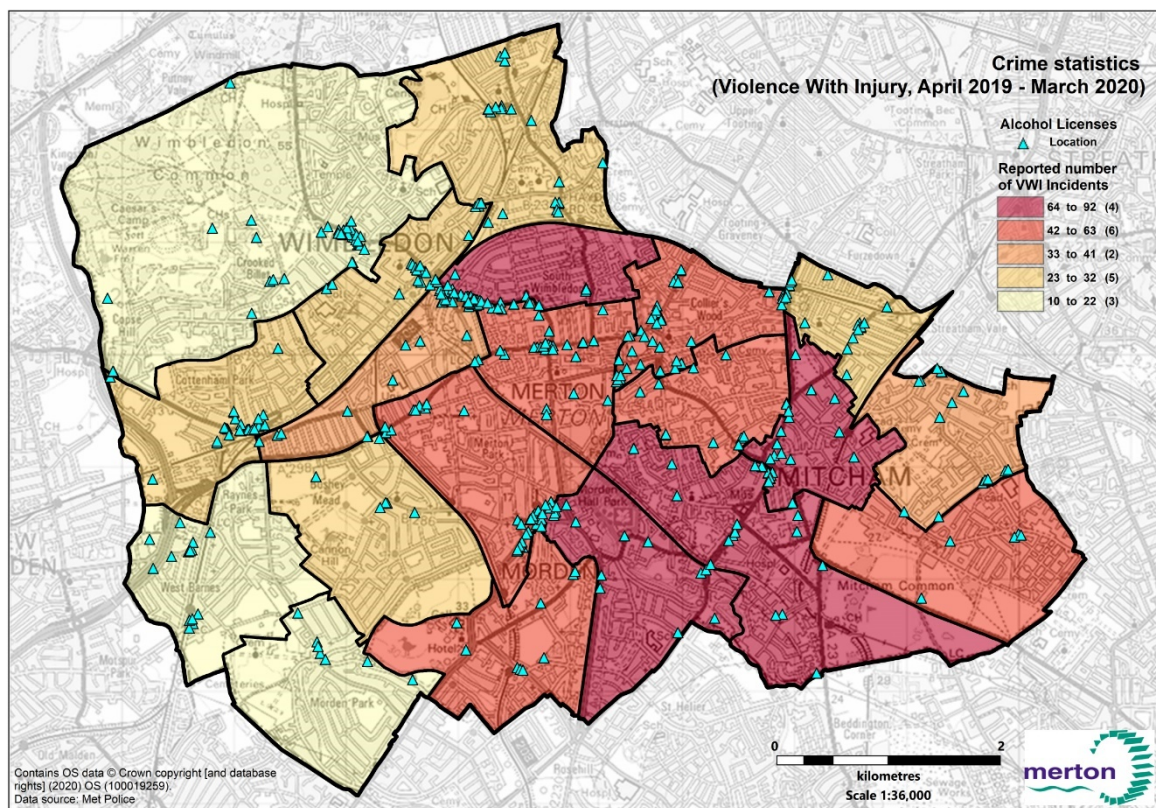
8. Violence with injury – non domestic

Trinity, Cricket Green and Figges Marsh Wards have the highest levels of violence with injury (non-domestic) reports. The areas of the existing Wimbledon Town Centre CIZ and the Mitcham Town Centre CIZ were seen to have high levels of violence with injury – non domestic offences. The area of the existing Wimbledon Village CIZ has the second lowest level of violence with injury in the Borough.

Violence with Injury - Non Domestic

Time Period: April 19 - March 20

Data Source: Metropolitan Police Service



Ward	Count
Abbey	49
Cannon Hill	24
Colliers Wood	52
Cricket Green	87
Dundonald	35
Figge's Marsh	92
Graveney	28

Hillside	25
Lavender Fields	42
Longthornton	33
Lower Morden	10
Merton Park	47
Pollards Hill	50
Ravensbury	64
Raynes Park	27
St Helier	47
Trinity	72
Village	18
West Barnes	20
Wimbledon Park	23

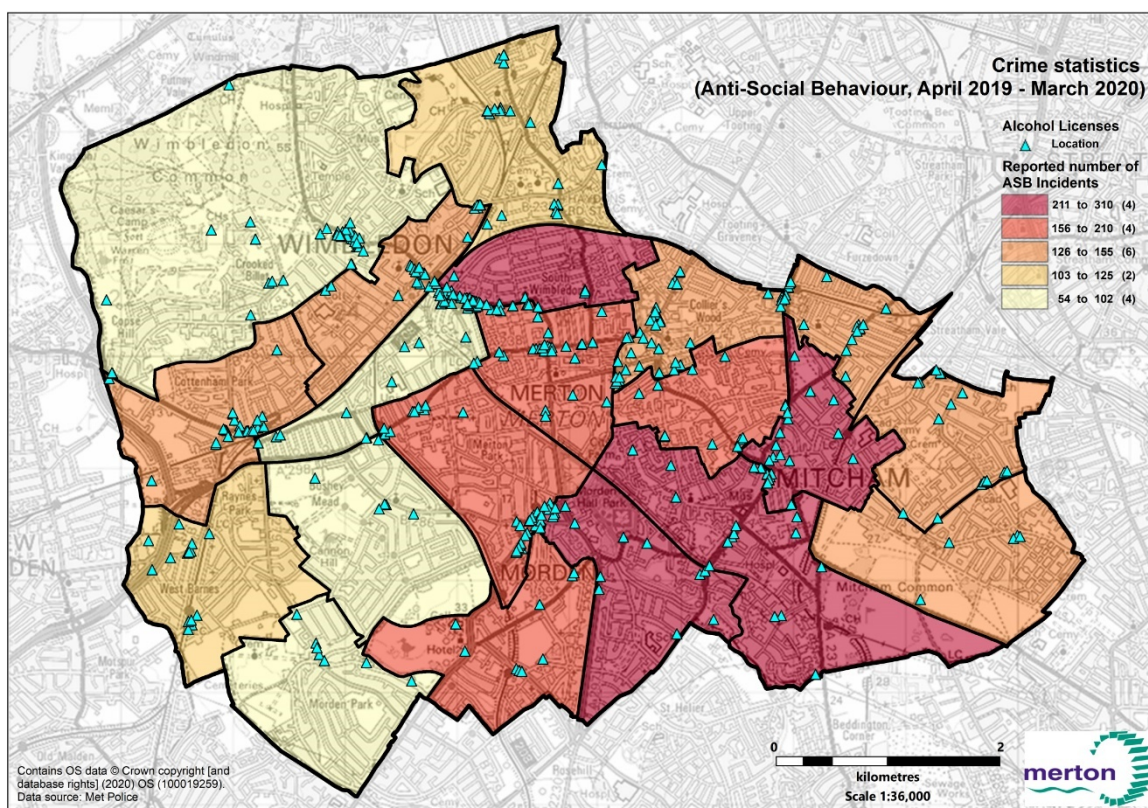
9. Anti-social behaviour

Trinity, Cricket Green and Figges Marsh and Ravensbury Wards have the highest levels of ASB complaints

ASB nuisance, rowdy and inconsiderate behaviour

Time Period: April 19 - March 20

Source: Metropolitan Police Service



Ward	Count
Abbey	183
Cannon Hill	54

Colliers Wood	135
Cricket Green	278
Dundonald	71
Figge's Marsh	310
Graveney	151
Hillside	126
Lavender Fields	156
Longthornton	142
Lower Morden	65
Merton Park	173
Pollards Hill	149
Ravensbury	211
Raynes Park	134
St Helier	157
Trinity	217
Village	80
West Barnes	103
Wimbledon Park	105

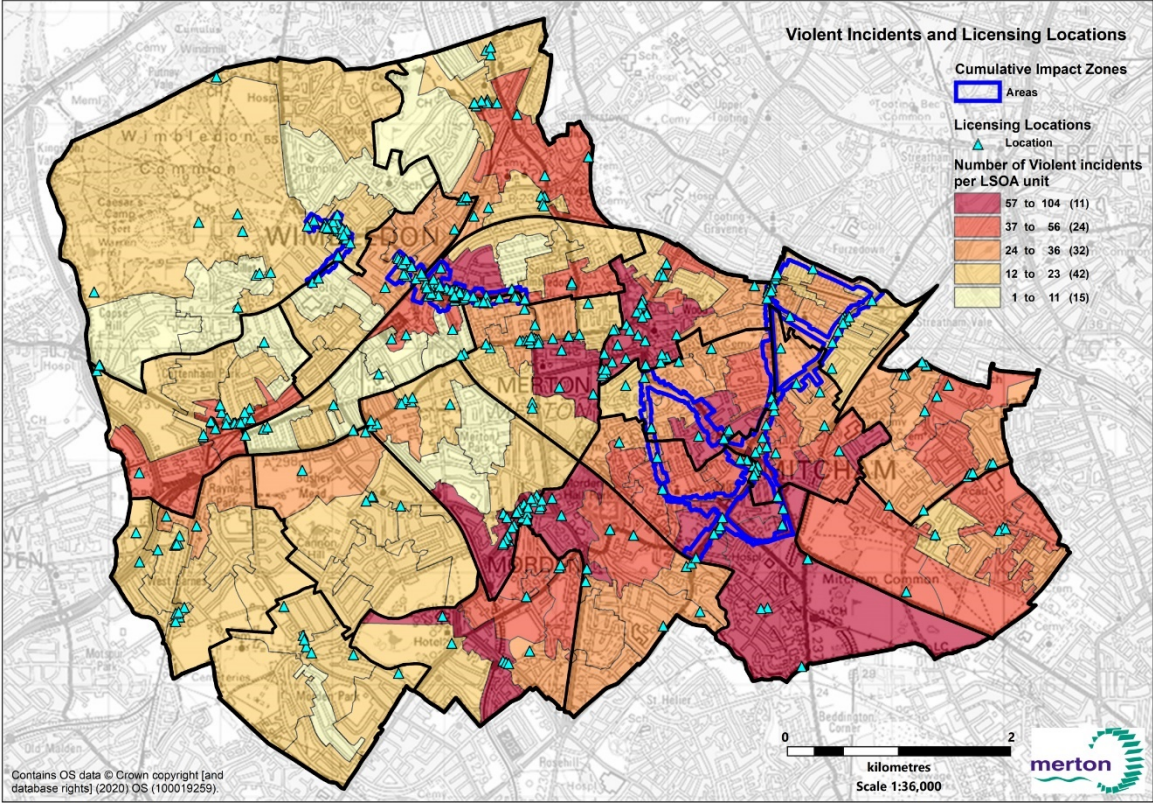
10 Violence against the person

Below is a map of violence against the person (with and without injury) recorded by the Metropolitan Police between April 2019 and February 2020 (11 months) by Lower Layer Super Output Area (LSOA) boundaries. This includes domestic and non-domestic calls. The map provides a more localised picture of police reports on violence than shown in the Ward analysis above but confirms that the two existing Cumulative Impact Areas of Wimbledon Town Centre and Mitcham Town Centre lie within areas of the highest police callouts for violent incidents, whilst the Wimbledon Village CIZ is in an area where there are relatively low police callouts for violence against the person.

Violence against the person

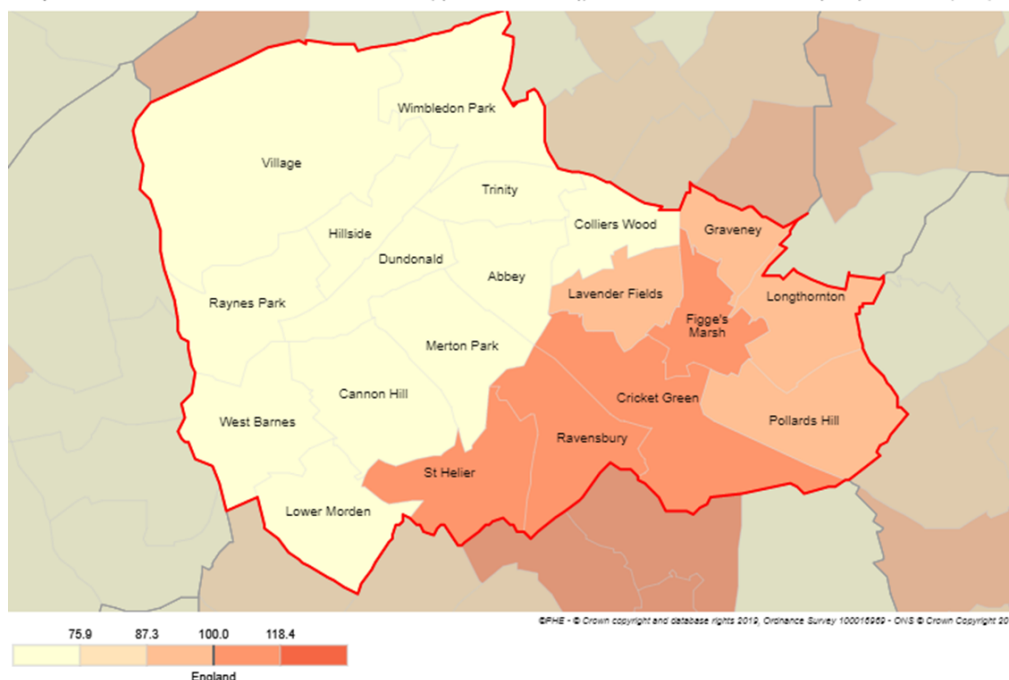
Time Period: April 19 - February 20

Source: Metropolitan Police Service via the London Data store



11. Hospital admissions for alcohol related conditions

Hospital admissions for alcohol attributable conditions, (Narrow definition), standardised admission ratio (SAR) - Source: Hospital Episode Statistics (HES) NHS Digital



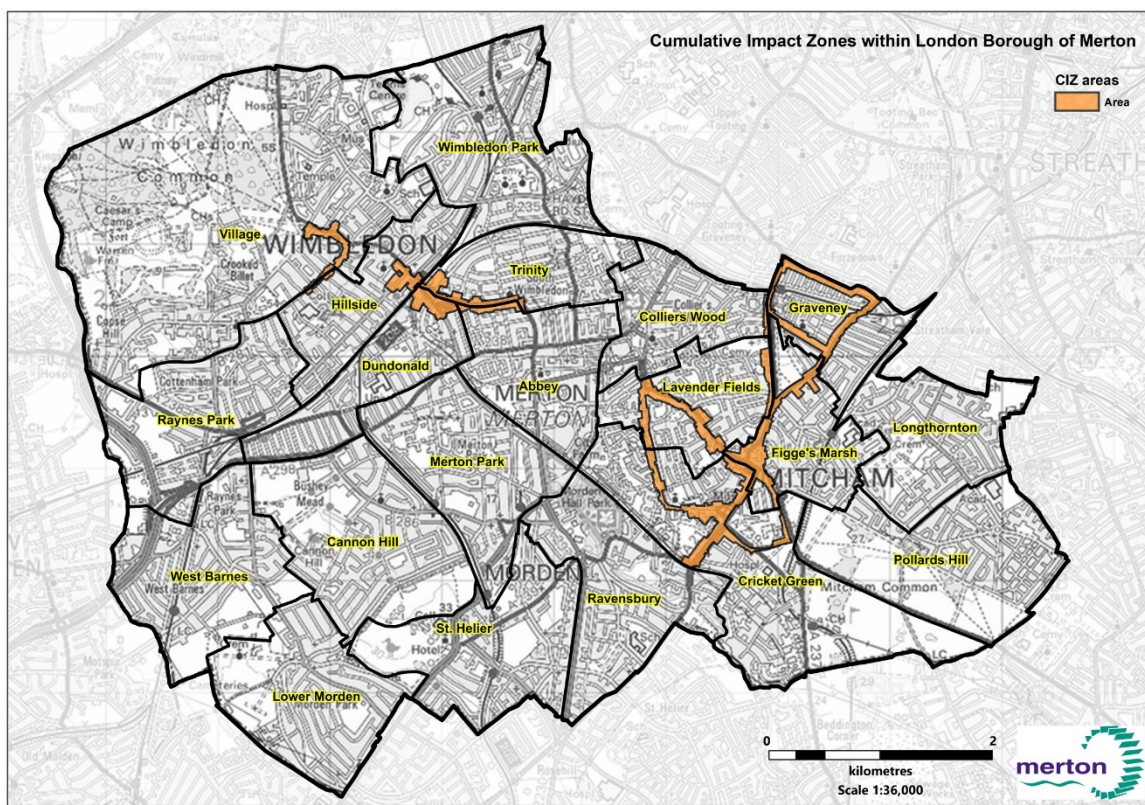
Appendix 2: Rank of Merton Wards for alcohol-related hospital admissions during the period 2013/14 to 2017/18

Rank	Ward	Hospital stays for alcohol related harm - Narrow definition (95% Confidence Interval)
1	Cricket Green	102 (91.3, 113.5)
2	Ravensbury	100.9 (89.6, 113.2)
3	Figue's Marsh	100.8 (90, 112.5)
4	St Helier	100.5 (89.6, 112.5)
5	Lavender Fields	96.5 (85.6, 108.5)
6	Longthornton	95.5 (84.6, 107.3)
7	Pollards Hill	91.4 (80.9, 102.9)
8	Graveney	89.1 (78.5, 100.7)
9	Abbey	75.2 (65.5, 85.8)
10	Trinity	73.8 (64.1, 84.7)
11	Lower Morden	73.7 (64, 84.5)
12	Cannon Hill	71.7 (62.2, 82.2)
13	Colliers Wood	71 (61.7, 81.3)
14	Merton Park	69.2 (59.9, 79.6)
15	West Barnes	62.2 (53.5, 71.9)
16	Hillside	59.2 (50.4, 69.2)

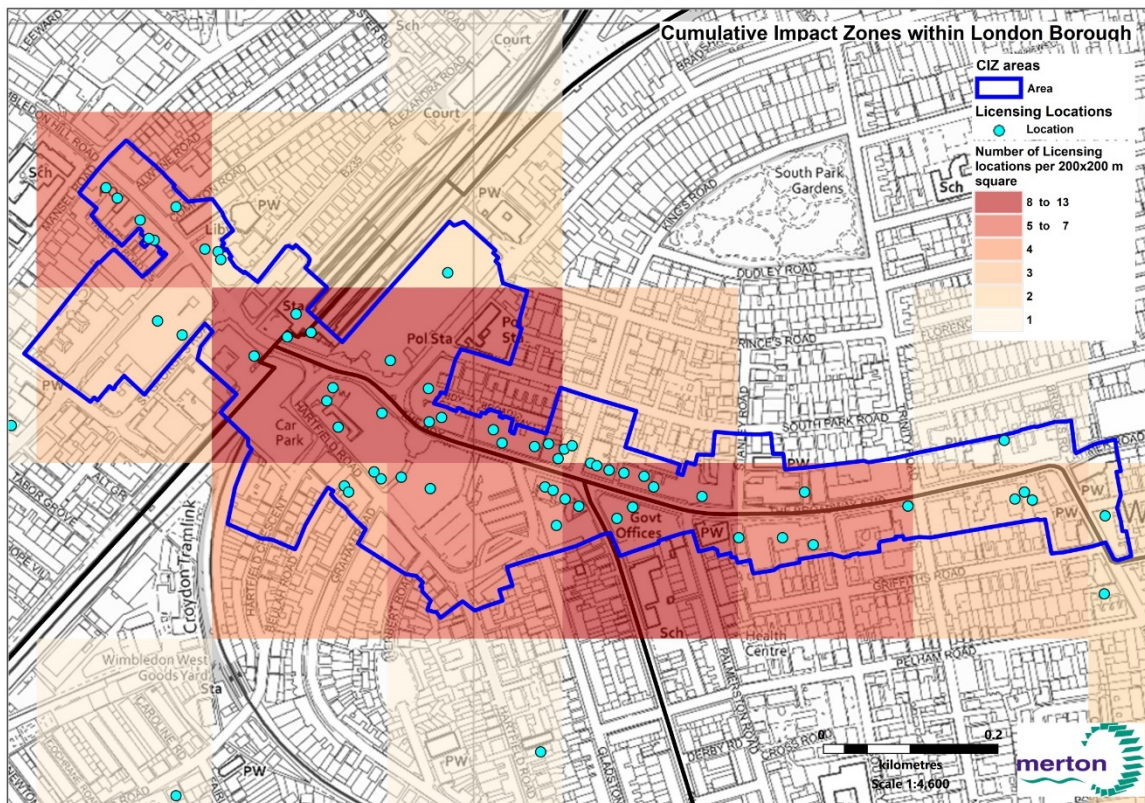
17	Raynes Park	59 (50.6, 68.5)
18	Dundonald	57.9 (49.1, 67.8)
19	Wimbledon Park	53.2 (45.2, 62.1)
20	Village	50 (41.8, 59.2)

12. Current Cumulative Impact Zones

Currently there are 3 Cumulative Impact Zones in the Borough. Two, Wimbledon Village and Wimbledon Town Centre were adopted in 2006, shortly after the implementation of the Licensing Act 2003. The third zone, Mitcham Town Centre was approved in 2015. The areas covered by the current policy are shown in the map below.



13. Wimbledon Town Centre CIZ



Active licences within Wimbledon Town Centre CIZ

Type	Number
Cinema/Theatres	4
Bar/Club/Pub	15
Restaurants	30
Convenience stores/supermarkets/off licence	11
Hotels	2
Takeaways/premises selling late night food only (no alcohol)	7

Maximum terminal hour for the sale of alcohol in premises within the Wimbledon Town Centre CIZ

Total number of premises	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 02.00 hours	Terminal hour 02.01 hours – 03.00 hours	No restriction
62	28 (45%)	23 (37%)	7 (11%)	3 (5%)	1 (2%)

Maximum Terminal hour for the sale of hot food and drink only

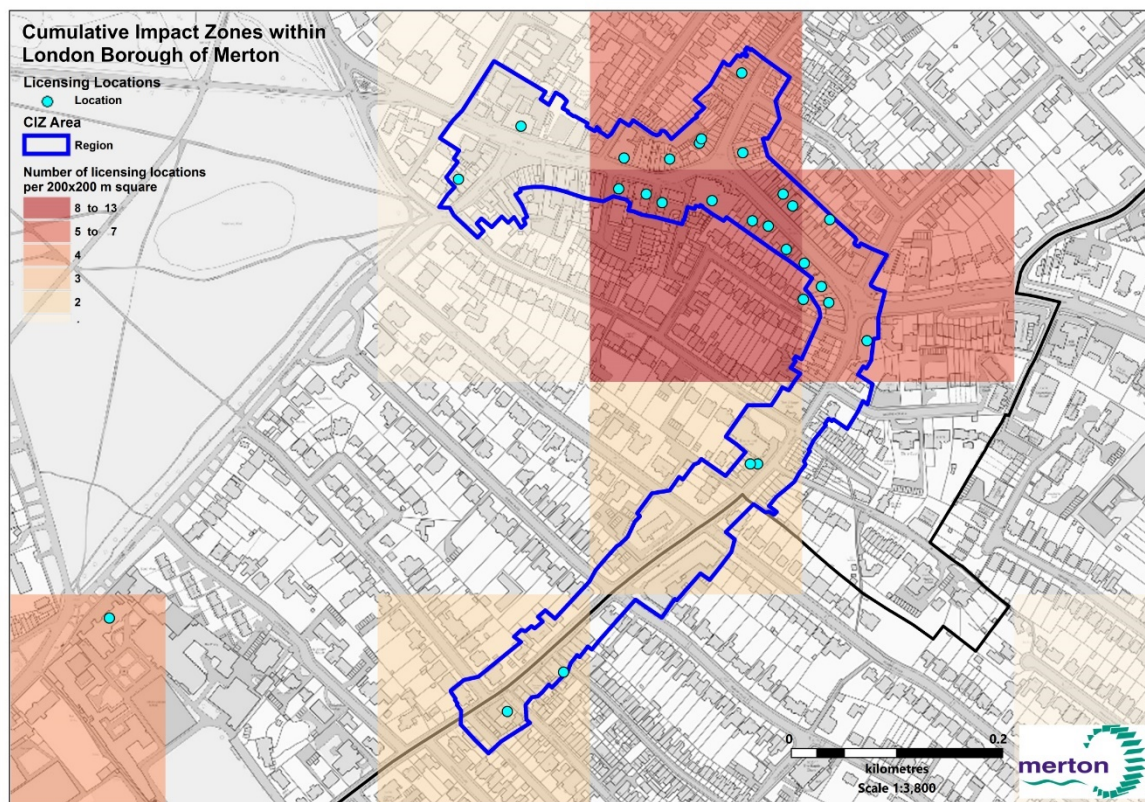
Total number of premises	Terminal hour up to 01.00	Terminal hour 01.01-02.00 hours	Terminal hour 02.01 – 03.00 hours	Terminal hour 03.01 hours – 04.00 hours
7	1	4	1	1

Wimbledon Town Centre CIZ falls within four Wards, Hillside, Trinity, Abbey and Dundonald. It has the highest concentrations of licensed premises in the borough.

Residents of Trinity and Abbey Wards register high levels of concern regarding people being drunk and rowdy in public spaces and general anti-social behaviour. These Wards have high levels of complaints to the police about anti-social behaviour, as well as high levels of ambulance call outs for alcohol and assaults and police call outs for violence – non domestic. Although relatively low in numbers, the area also attracts a number of complaints to the Council’s licensing and noise teams. It is clear, therefore, that the area has a high density of licensed premises which is adversely impacting on crime and anti-social behaviour in the area. It is proposed that Wimbledon Town Centre retains the special policy with regard to Cumulative Impact as any increase in premises numbers or hours will add to the existing relatively high levels of crime and anti-social behaviour in the area, particularly later into the evening.

In publishing this cumulative impact assessment the authority is setting down a strong statement of approach to considering applications or the grant or variation of premises licences in the Wimbledon Town Centre CIZ. The authority considers that the number of premises licences in the Wimbledon Town Centre CIZ is such that it is likely that granting further licences would be inconsistent with the authority’s duty to the licensing objectives.

11. Wimbledon Village CIZ



Active licences within Wimbledon Village CIZ

Type	Number
Pubs/Bars	5
Restaurants	18
Convenience stores/supermarkets/off licence	5
Takeaways/premises selling late night food only (no alcohol)	0

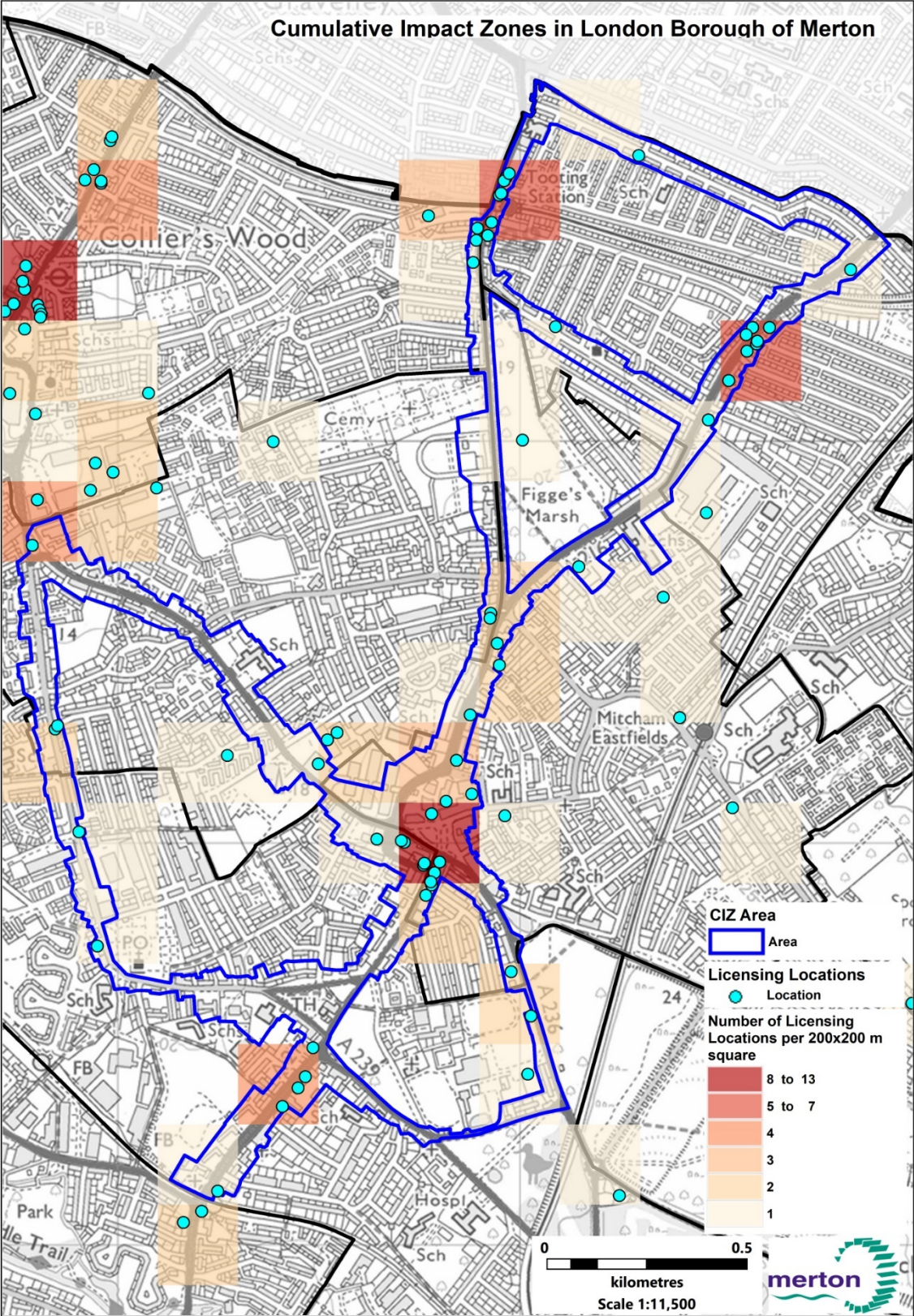
Maximum terminal hour for the sale of alcohol in premises within the Wimbledon Village CIZ

Total number of premises	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 02.00 hours	Terminal hour 02.01 hours – 03.00 hours	No restriction
28	18 (64%)	9 (32%)	1 (4%)	0	0

The majority of the Wimbledon Village CIZ lies within Village Ward. This Ward has the second lowest level of violence with injury – non domestic reports in the Borough, the 6th lowest level of ambulance callouts for alcohol and one of the lowest levels of ambulance callouts for assaults. It ranks the fourth lowest Ward for Anti-Social behaviour complaints to the police. Information from the residents' survey indicates that residents of Village Ward generally feel safe and do not see that there is a problem with drunkenness and rowdy behaviour in the borough.

Whilst there is a concentration of licensed premises along Wimbledon High Street there is little evidence to support the view that this is giving rise to high levels of crime, disorder or nuisance. Residents do not highlight a problem in the area and generally feel safe in their neighbourhood. It is therefore recommended that Wimbledon Village be removed from the Council's special policy on cumulative impact. However, it should be noted that this removal does not mean that all applications for new or varied licences will be automatically granted. Like all other areas of the borough not included in the policy, each application must be looked at on its individual merits and may be refused if there is good evidence to do so.

12. Mitcham Town Centre CIZ



Active licences within Mitcham Town Centre CIZ

Type	Number
Bar/Club/Pub	10
Restaurants	4
Convenience stores/supermarkets/off licence	38
Sports venue/open spaces	2
Takeaways/premises selling late night food only (no alcohol)	6

Maximum terminal hour for the sale of alcohol in premises within the Mitcham Town Centre CIZ

Total number of premises	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 02.00 hours	Terminal hour 02.01 hours – 03.00 hours	No restriction
52	36(69%)	7(13%)	8(15%)	0	1(2%)

Maximum Terminal hour for the sale of hot food and drink only

Total number of premises	Terminal hour up to 01.00	Terminal hour 01.01- 02.00 hours	Terminal hour 02.01 – 03.00 hours	Terminal hour 03.01 hours – 05.00 hours
6	2	1	1	2

The Cumulative Impact Zone covering Mitcham Town Centre and surroundings was approved in 2015. The Mitcham Cumulative Impact Zone is restricted to 'off – premises' sales only, as the evidence did not suggest that 'on- premises' sales needed to be included. The Mitcham Town Centre Cumulative Impact Zone mainly falls within four Wards, Graveney, Figges Marsh, Lavender Fields and Cricket Green

The decision to adopt a special policy on Cumulative Impact for Mitcham Town Centre and the area to be included was based on information provided by Public Health which included an audit of the area carried out by a team of Youth Inspectors (YIs) and the results of a consultation carried out with local residents in early September 2015.

On 19/20 August 2015, a team of Youth Inspectors (YIs) walked the area covered by the then proposed Cumulative Impact Zone (CIZ) around Mitcham. They noted whether premises they passed sold alcohol or fast food, and the appearance of stores and streets, noting any antisocial behaviour or litter. The Youth Inspectors noted 165 retail outlets in the Mitcham Cumulative Impact Zone area. Of these, 44 (27%) were places to buy food ingredients, 26 (16%) were fast food outlets, 3 (2%) were restaurants, 6 (4%) were cafes, 6 (4%) were pubs, 6 (4%) were betting shops

and 2 (1%) were payday loan shops. The rest (72, 44%) were a mix of other uses, for example estate agents, hairdressers, garages.

Of the 44 places to buy food ingredients (i.e. convenience stores, corner shops, grocers, off-licenses, supermarkets), at least 80% (35/44) appeared to sell alcohol. Alcohol is therefore available in at least a fifth (21%, 35/165) of all premises noted by the YIs. They also noted 6 pubs in the proposed CIZ area. Of the 35 convenience stores or supermarkets that sold alcohol: at least 57% (20/35) sold super strength alcohol (i.e. beer or cider of 6.5% ABV or more); a third (31%, 11/35) did not (4 unknown). The majority (83%, 29/35) sold single cans (5 did not, 1 unknown)

In early September 2015 a consultation was carried out of residents in the area. A total of 192 people participated in the consultation. One third of respondents (64) felt that Mitcham Town Centre had too many alcohol shops. Among responses relating to the alcohol environment were concerns about street drinkers. Over half of respondents also felt that the area was littered, with comments regarding broken glass and beer cans on the streets. There was significant mention of anti-social behaviour and crime and safety during the night, with 117 and 94 respondents respectively reporting these as a concern.

Unfortunately, it has not been possible as planned, to carry out another survey of the area to compare the findings with those of 2015. However, the number of licensed premises selling alcohol off the premises remain at a similar level to that found in 2015 (38 premises selling alcohol for consumption off the premises in 2020 compared to 35 noted in 2015). The difference in numbers is likely to be due to a difference in assigning premises to a particular category rather than to a real increase in numbers.

Residents of the four Wards in which the Mitcham Town Centre CIZ lies express high levels of concern about anti-social behaviour, people being drunk and rowdy in public places and people hanging around the streets. The area also records high levels of crime, anti-social behaviour and ambulance call outs.

In September 2019, a report the Head of Community Safety presented a report to the Overview and Scrutiny Panel which included information on street drinking delivery and Public Place Protection Order Enforcement. The report stated that the majority of enforcement action on street drinking was taking place in and around the wards of Figges Marsh and Cricket Green, with proactive enforcement around Mitcham Town Centre which had resulted in a reduction in visible street drinking in Mitcham Town Centre but with an element of displacement.

In view of the continuing problem with street drinking around Mitcham Town Centre and in light of the actual and perceived problems associated with alcohol in the area it is proposed to retain the Mitcham Town Centre special policy on cumulative impact with no amendments to the area or to the type of premises to be included in the policy.

In publishing this cumulative impact assessment the authority is setting down a strong statement of approach to considering applications or the grant or variation of "off-sales" premises licences in the Mitcham Town Centre CIZ. The authority

considers that the number of “off-sales” premises licences in the Mitcham Town Centre CIZ is such that is likely that granting further licences would be inconsistent with the authority’s duty to the licensing objectives.

This CIA does not, however, fundamentally change the way that licensing decisions are made. It is therefore open to the licensing authority to grant an application where it considers it appropriate and where the applicant can demonstrate in the operating schedule that they would not be adding to the cumulative impact.

The cumulative impact assessment does not relieve responsible authorities or any other persons of the need to make relevant representations where they consider it appropriate to do so for the promotion of the licensing objectives. Anyone making a representation may base it on the evidence published in the cumulative impact, or the fact that a CIA has been published.

13. Inclusion of new areas in the Cumulative Impact Assessment.

The area around Morden Town Centre has a high concentration of licensed premises which coincides with higher levels of crime, anti-social behaviour and ambulance call out in the borough. However, this area is covered by the Council’s regeneration plans and it would, therefore, not be appropriate at this time to include this area in the Council’s Cumulative Impact Assessment.