

From: Russ.Stevens@met.police.uk <Russ.Stevens@met.police.uk>

Sent: 10 August 2020 13:47

To: [REDACTED]

Cc: [REDACTED]

Subject: RE: Review of Merton Licensing Policy comments plesae

Hi Helen,

I had discussed the policy review a few times with Barry Croft prior to Lockdown, and he told me that Police stats had already been obtained. I'll see if I have an email confirming this and from where the stats were coming from.

I can interpret the figures from a Police perspective if you have them.

Please say if you do still need crime figures and I will arrange the research, and then comment accordingly. This is what I had initially expected would be required, and was surprised (and relieved) when Barry said otherwise.

From my observations and experience over the last 4 years, there is clear evidence that the CIZs have been effective in Mitcham and Wimbledon town centres. ASB and crime associated with street drinking in Mitcham town centre remains a problem and I often make representations to block applications for new Premises Licences within the zone. The most recent being in May for a new off-licence only two doors from another where there are already 10 off-licence shops within 300m. I also have an interesting letter from a local resident commenting on the positive effects of the obvious enforcement of the CIZ.

Wimbledon Town Centre, prior to Lockdown, required constant management to control ASB and crime. Whilst there has been some mild departure from the policy, the CIP has enabled us to heavily restrict new licences to negate the risk of further impact on crime and ASB.

Wimbledon Village has not suffered from crime or ASB associated with the cumulative effect of multiple premises selling alcohol. Alcohol related crime in this area is extremely low considering the presence of several bars and restaurants, and ASB complaints have only ever been about individual premises. Numerous ASB complaints have been received about the one premises that remained open (legally for takeaways) during Lockdown due to perceived breaches of COVID guidance, and complaints are still being received due to customers standing on the pavements.

The Tennis Championships fortnight is traditionally our NTE's busiest period and crime/ASB does increase, but not excessively. Footfall is significantly reduced at all other times. There have been departures from the current policy in the village, notably new Premises Licences at the Ivy Restaurant and Megan's, and neither have had any effect on crime or ASB. I can see no justification to keep the current CIP in the village, and it's existence does not assist in the management of crime/ASB in that area.

All the best

Russ

Russ STEVENS PC3852SW P191701

Merton Licensing | Wimbledon Police Station | Metropolitan Police Service
[REDACTED]

Public Health Response to Statement of Licencing Policy and Cumulative Impact Consultation

Purpose

As a responsible authority for licencing in Merton the Director of Public Health (“Public Health”) has a statutory role to promote the licencing objectives, with particular consideration for the impact of alcohol availability on the health and wellbeing of the community. In fulfilment of this role, this document provides Public Health’s response to the proposed update to Merton’s statement of licensing policy for the period 2021-2026. This includes proposed changes to the current special policies on cumulative impact.

Public Health Principles

Working in partnership and across boundaries for the improvement of population health by addressing the wider determinants of health and embedding health in all policies are key public health principles in Merton. These are emphasised in the Merton Health and Wellbeing Strategy 2019-2024 and were applied in the review of the proposed statement of licensing policy. Reducing the harmful effects of alcohol consumption, substance misuse, violence and injury are public health priorities relevant to the licencing process.

Public Health Response

The response is divided into (1) general points, outlining the overall position of Public Health with regards to the proposal; and (2) specific points, in which suggestions are made for changes or additions to the text in the statement of licencing policy. Public health data referenced in this response are summarized in the appendices.

General Points:

1. Public Health is in support of the proposed the statement of licencing policy for Merton but would propose a number of changes to the text (see “Specific Points”).
2. Public Health is in support of the continuation of a cumulative impact zone (CIZ) in Mitcham Town Centre, which is restricted to off-premises sales, based on data presented in the Merton Cumulative Impact Analysis. Public Health data provide further support for cumulative impact with high levels of hospital admissions for alcohol related conditions in the wards which fall into the CIZ. For example, Cricket Green has the highest standardised admission ratio (SAR) for alcohol attributable conditions in Merton (102.0) and is higher than the average for England (100.0).
3. Similarly, Public Health is in support of the continuation of the cumulative impact zone (CIZ) in Wimbledon Town Centre on the basis of the density of premises and crime data presented in the cumulative impact analysis. Available public health data do not appear to show a cumulative impact on health, however, with hospital admissions for alcohol related conditions in the wards within this CIZ all relatively low compared to the English average and East Merton wards. For example, Dundonald has a SAR for alcohol attributable conditions of just 57.9.

4. Public Health is in support of the discontinuation of the CIZ in Wimbledon Village. The data presented in the cumulative impact analysis do not support a cumulative impact on the licencing objectives in this area and alcohol-related hospital admissions in Village Ward are the lowest in the Borough.
5. The cumulative impact analysis found that the high density of licenced premises in Morden Town Centre (31 premises) coincided with high levels of violence, anti-social behaviour and ambulance call outs in the wards connected to it. These data show comparable or higher rates than wards containing Wimbledon and Mitcham Town Centres. For example, Merton Park and Ravensbury saw the joint second highest number of ambulance call outs for assault in the Borough between April 2019 and March 2020 with a high density of violent incidents specific to Morden Town Centre. In the 2019 residents' survey, Ravensbury had the highest number of concerns about anti-social behaviour in the borough with particular concerns around people being drunk and rowdy in public places. Additionally, public health data on hospital admissions for alcohol related conditions in Ravensbury and St Helier are also among the highest in the borough (appendix 2). As such, there is evidence for a cumulative impact on licencing objectives and public health outcomes in this area. However, Morden Town Centre is part of a planned redevelopment project and it is important that any actions to tackle these issues are fully evidence-based and would not interfere with planning. As such, while a CIZ covering Merton Town Centre is not appropriate at this time, Public Health proposes that an audit of this area and consultation with local residents be undertaken. This would be similar to that undertaken in Mitcham Town Centre in 2015 and would aim to inform the next review of cumulative impact in three years.

Specific Points:

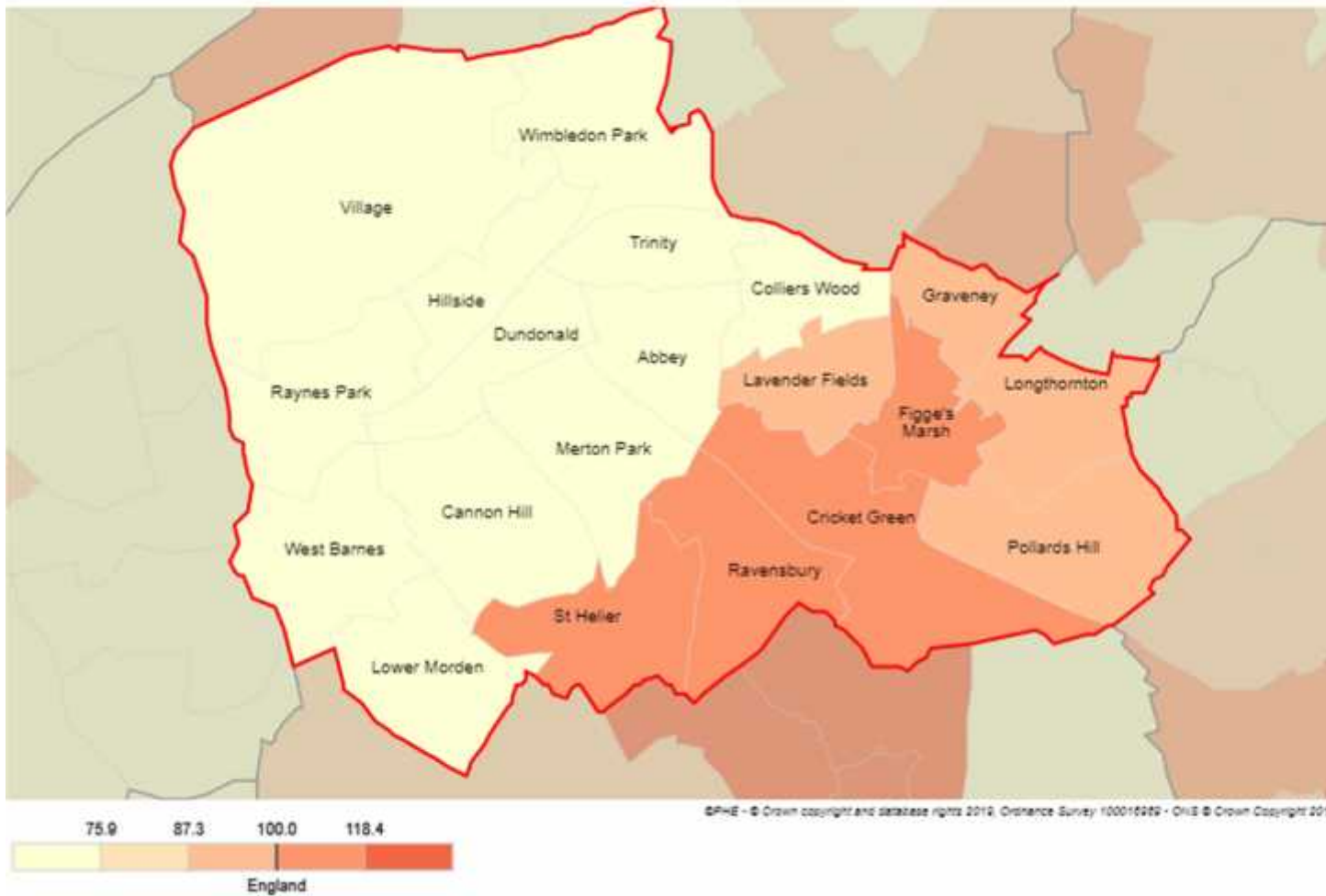
A summary of the recommended changes to the text of the Statement of Licencing Policy are below. Specific suggested wording can be found in appendix 3.

1. **Section 1.9** - additional wording around the role of Public Health.
2. **Section 2** – additional sub-section after sub-section 2.3 summarising the relevant public health data for Merton related to alcohol licencing.
3. **Section 4.5** – addition of a bullet point with wording around the importance of partnership working both between responsible authorities and with the community in order to encourage a holistic approach to licencing which upholds the licencing objectives while also promoting the Council's strategic objectives.
4. **Section 9** – additional sub-section between 9.7 and 9.8, highlighting the specific importance public health data in the assessment of cumulative impact.
5. **New section** – additional section following sections 11-14, which relate to individual licencing objectives, for public health. This would acknowledge that public health is not a licencing objective but would state that health related data will always be considered where they relate to the licencing objectives. It would also encourage applicants to consider health impacts of proposed activities and provide guidance for health-related considerations when completing operating schedules.

Appendix 1: Map of Merton Wards showing data for hospital admissions for alcohol-related conditions

NB: "Narrow definition" indicator includes admissions to hospital where the primary diagnosis was an alcohol-related condition, or a secondary diagnosis was an alcohol-related external cause during the period 2013/14 to 2017/18.

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	Figge'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)

Appendix 3: Recommendations for text changes and additions to the Statement of Licencing Policy

Section 1.9 - additional wording around the role of Public Health

“The Council recognises the links between excessive alcohol consumption and poor health. In addition, alcohol is associated with a wide range of criminal offences including drink driving, being drunk and disorderly, criminal damage, assault and domestic violence. In young people, alcohol is associated with anti-social behaviour and teenage conception. **It is therefore essential to consider health-related harms where they are relevant to the promotion of the licencing objectives.** Whilst public health is not a licencing objective ~~and cannot be taken strictly into account when deciding applications,~~ The Director of Public Health is a Responsible Authority under the Act and is able to make representations in its own right or through supporting other representations. The Public Health team is able to bring data and evidence from the health sector into the licencing process in order to support the promotion of the licencing objectives, in particular the prevention of crime and disorder and the protection of children from harm.”

Section 2 – additional sub-section after sub-section 2.3 summarising the relevant public health data for Merton related to alcohol licencing

“The 2019 Joint Strategic Needs Assessment reported a significant level of alcohol related harm in Merton, with approximately 42,000 estimated to be drinking at harmful levels. Alcohol consumption is a key risk factor for the main causes of ill health and premature death in Merton, including cancer and circulatory disease, making tackling overconsumption a key public health priority. In the period 2018/19, there were 40.8 alcohol-related deaths per 100,000 population, which is higher than the London benchmark although lower than the English average. Additionally, the rate of alcohol-related hospital admission in Merton has recently increased from between 1800 and 1900 per 100,000 between 2011/12 and 2016/17 up to 2358 per 100,000 in 2018/19.

The impacts of alcohol on health are not distributed evenly across the borough with higher rates of hospital stays for alcohol related harm in the East of the Borough compared to the West. Areas of Merton with high numbers of licensed premises generally have a higher number of alcohol- and assault-related ambulance call-outs.”

Section 4.5 – addition of a bullet point with wording around the importance of responsible authorities working together in partnership in order to promote a holistic approach to licencing which upholds the licencing objectives while also promoting the Council’s strategic objectives.

“The council acknowledges the importance of partnership working in the licencing process. Individual responsible authorities work together in partnership as well as in partnership with other persons, bodies or businesses in the community in order to maintain a holistic approach to licencing which upholds the licencing objectives while also promoting the Council’s strategic objectives.”

Section 9 – additional sub-section between 9.7 and 9.8, highlighting the added importance of public health data in assessing the cumulative impact of premises;

“Public health data are particularly suitable for the analysis of cumulative impact within an area, as well as the assessment of a licence application where it relates to a premises within an existing cumulative impact area. For example, in situations where a high level of alcohol related ambulance activity occurs in conjunction with alcohol related violent crime.”

New section – additional section following sections 11-14, which relate to individual licencing objectives, for public health. This would acknowledge that public health is not a licencing objective but would state that health related data will always be considered where they relate to the licencing objectives. It would also encourage applicants to consider health

impacts of proposed activities and provide guidance for health-related considerations when completing operating schedules.

“Although the protection and improvement of public health is not a licensing objective, alcohol related harm is a cause for concern in Merton (see section 2). Public health data will therefore always be considered where relevant to the promotion of the licensing objectives.

The council expects applicants to consider the health impacts of their proposed activities. Therefore, in determining a licence application where relevant representations have been made, the Licencing Authority will consider the adequacy of the measures taken to limit health impacts relating to the licencing objectives. In particular, the licencing authority may consider the following best practice measures:

-) Restricting special offers such as cheap shots, ‘happy hours’, ‘buy one, get one free’, ‘buy two glasses of wine and get the whole bottle’. This slows down consumption, the rate at which blood alcohol concentrations increase and the peak levels are reached by drinkers. Rapidly ascending and high blood alcohol concentrations are associated with violence and uninhibited behaviour.
-) aligning price with alcohol by volume (ABV)
-) ensuring that non-alcoholic drinks are significantly cheaper than alcoholic drinks
-) increasing seating for customers to reduce intensive drinking
-) reducing the volume of music as loud music can increase alcohol consumption
-) actively promoting designated driver schemes where a driver is offered discounted or free non-alcoholic drinks
-) making food available in late venues
-) starting the sale of alcohol later in the day and not aligning it purely with opening hours
-) not advertising alcohol in the shop window
-) storing alcohol behind the shop counter
-) not using display boards or other advertising on the shop floor
-) not selling single cans of alcohol
-) not selling single bottles of beer, and other alcohol beverages such as cider, under 1 litre
-) not selling beer or cider over 5.5% ABV
-) not selling alcohol where they could attract under age purchasers”

From: [REDACTED]

Sent:

To: [REDACTED]

Cc:

Subject: Response to CIZ analysis 2021

Sent on behalf of Merton Conservatives

Dear Sheila,

Please find our response below, can you confirm receipt?

Merton Conservatives acknowledge that the Cumulative Impact Analysis has been developed in response to the change in the rules governing Cumulative Impact Zones (CIZ) by the Home Office in 2018 and welcome the work that has been done to focus on reducing crime and anti-social behaviour. We note that as a result of the change in governing rules of CIZ regrettably there is insufficient evidence to justify an application to renew the CIZ in Wimbledon Village. However, the three town centres are the main focus of ambulance call outs, violence and anti-social behaviour. As such, the potential for alcohol related anti-social behaviour and crime to rise in Wimbledon Village remains. If there was a sharp upswing in anti-social behaviour then we would support immediate measures to suppress this – which would include an application for the re-introduction of a CIZ if the evidence is there to support one as set-out in the new Home Office guidance as well as the introduction of a public space protection order (PSPO) or other measures to combat anti-social behaviour. We further note that Morden town centre is not included in the analysis, yet it clearly has a large level of violence and anti-social behaviour. While the council does not wish to include Morden in the CIZ analysis at this time, we support further action, including a PSPO, being taken to remove the potential for anti-social behaviour.

All the best,

[REDACTED]

From [REDACTED]

Sent: 03 September 2020 16:18

[REDACTED]

ts

Subject: Wimbledon Village CIZ - Belvedere Estate Residents' Association response

Dear Ms Brass, Stephen and Councillors,

I attach hereto the Belvedere Estate Residents' Association response to the proposal to cancel the CIZ status of Wimbledon Village regarding licensing. We are totally against removal of the CIZ and therefore 'Strongly Disagree' that there is no evidence to retain the Village CIZ. We do, however, 'Strongly Agree' that the Town Centre CIZ is retained.

The entire BERA Committee of 8 people live in Village Ward. If you have any queries whatsoever please do not hesitate to contact me.

With Kind Regards,

[REDACTED]

BELVEDERE ESTATE RESIDENTS’ ASSOCIATION RESPONSE TO:-

“CONSULTATION, LICENSING POLICY 2021-2026 AND CUMULATIVE IMPACT ASSESSMENT” IN RESPECT OF WIMBLEDON VILLAGE

The designation of Wimbledon Village as a “Cumulative Impact Zone” has served us well in protecting the amenities of the residents when licensing applications have been considered, and, in our view, has enabled a fair balance to be achieved between the interests of the residential and business communities, who are inextricably linked as in many instances BERA residents live above many of the businesses including licensed premises.

We believe the recommendation for the removal of the designation of Wimbledon Village as a Cumulative Impact Zone for the purposes of Merton’s Licensing Policy is not justified because:

1. CIZ designation for Wimbledon Village since 2006 has had a beneficial effect in preventing an increase in the number of licensed premises in the Zone and in ensuring that residents’ concerns about controlling nuisance etc. are properly addressed in licensing applications. (Most applicants apply speculatively at first for late night opening every night). Removal of the designation will reverse these benefits and will have a long lasting and detrimental impact upon the character of the Village (eg Open Season on new applications for late night opening, new premises opening etc, etc.)
2. When Megan’s and more recently Carmona, both on Village High Street applied for their respective licenses, they agreed to the ‘usual’ Village opening hours etc. despite initially requesting much longer hours to serve alcohol. This was sorted out by a few emails and in a matter of days without the need for a specific Licensing meeting.
3. The Cumulative Impact Assessment upon which the recommendation is based relies heavily upon an analysis of data relating to Crime and Disorder incidents. These are not relevant to the Wimbledon Village CIZ which was designated in response to incidents of Public Nuisance. The Prevention of Crime and Disorder and the Prevention of Public Nuisance are separate but distinct

Licensing Objectives which are of equal value when considering a CIZ designation. They have not been given equal weight in the Assessment.

4. The survey evidence cited in the assessment reporting residents' views on perception of crime, personal safety and other considerations was from a 2019 sample survey across the Borough. It gives neither a representative view in the Village Ward (the sample was too small) nor is it relevant in the context of Village CIZ licensing matters as respondents weren't asked about licensing related issues including their experience of nuisance incidents.

5. By their nature, incidents of Public Nuisance (such as noise and antisocial behaviour) tend not to be reported by residents nor require intervention by the police or other authorities so the absence of incident data should not justify an assumption that there have been no nuisance issues. Residents living in and around the Village say that they do experience ongoing nuisance issues (eg late night noise and disturbance, littering, parking problems and some antisocial behaviour) even if they have not reported them to the authorities. I have spoken to many residents just recently to get a feel for the current situation and I hope that they will personally send you an outline of the specific instances. I will therefore just re-iterate one issue on behalf of residents at Bluegates, Belvedere Drive. Although not on either the High Street or Church Road where the majority of licensed premises are situated, and also a considerable distance from the main thoroughfare, many residents hear late night revellers as they walk from the Village down Wimbledon Hill Road, dropping litter in their wake. Were the Village licensed premises allowed to open later then this would represent an even greater disturbance as it could be in the early hours of the morning, resulting in serious sleep deprivation for many which is not good for general or mental health.

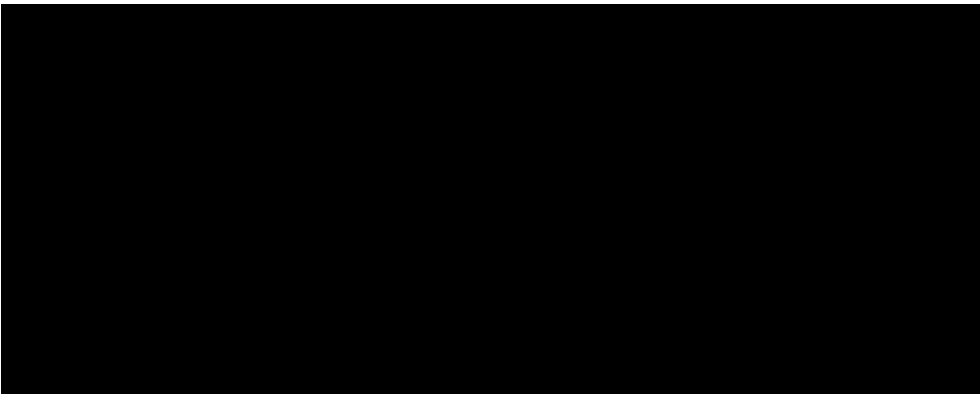
There is no doubt that things have improved within the CIZ since 2006 however there is a developing and ongoing issue with open air drinking (possibly underage?) and partying on Rushmere. There was a major incident at the end of June when Police and Ambulances were called so that will have been logged so presumably you will already be aware of that. We have no idea where the alcohol is being bought but the simple point is that The Common adjoins a CIZ which includes off licenses and restaurants/pubs/bars with off sales licences. This type of incident could

become more frequent if the CIZ were removed and therefore alcohol was more readily available for a longer number of hours.

To Conclude therefore, the Belvedere Estates Residents' Committee "Strongly Disagrees" that there is no evidence to retain the Village CIZ.

However, please note that we "Strongly Agree" to the retention of the Town Centre CIZ.

With regards,



PARKSIDE RESIDENTS' ASSOCIATION



Sheila Brass
Licensing Section
London Borough of Merton
Civic Centre
London Road
Morden, SM4 5DX

16 August 2020

Dear Ms Brass

Consultations: Licensing Policy 2021-2026 and Cumulative Impact Assessment

Thank you for the invitation to respond to the above Consultations.

We do not have any comments to make upon the suggested revisions to the draft Licensing Policy, other than in relation to the proposal to withdraw the designation of Wimbledon Village as a Cumulative Impact Zone ("CIZ") which is based upon the analysis in the Cumulative Impact Assessment ("CIA") circulated with the draft Policy.

We very much regret and strongly oppose the proposed withdrawal of the Village CIZ from the Licensing Policy due to take effect in 2021. We believe the proposal is not justified and do not accept the analysis in the CIA which supports this recommendation. Our reasons are set out below.

1. Background

1.1 The membership area of this Association, which comprises over 300 households, is to the north of Wimbledon Village. It includes Marryat Road and Parkside which adjoin Wimbledon Village High Street, Burghley Road which adjoins Church Road and Peek Crescent, Rushmere Place and Parkside Avenue which are all close to the Village. Residents within our membership area take a keen interest in the preservation of the amenities of Wimbledon Village for the benefit of the local community.

1.2 In 2004/2005 we, along with the Wimbledon Union of Residents Associations ("WURA") and other residents' groups, worked with Ward Councillors to contribute towards the formulation of Merton's Licensing Policy, and in particular the designations of Wimbledon Village and Wimbledon Town Centre as Cumulative Impact Zones. Since then we have continued to take an active interest in licensing matters and have reviewed all licensing applications which have been submitted within the Village CIZ.

1.3 The commercial elements of Wimbledon Village are laid out in a ribbon pattern along the High Street, Church Road and part of the Ridgway, all with residential roads behind them or directly adjoining. There are also a large number of flats at first and second floor level above many of these premises, especially on the High Street. With this proximity, many residents are therefore directly impacted by any noise, disturbance and nuisance issues which occur from the behaviour of customers of licensed premises.

1.4 The high concentration of licensed restaurants pubs and bars has had the effect of establishing Wimbledon Village as a popular "destination venue" attracting large numbers of visitors, especially at weekends. Many of them travel here by car and park in surrounding residential roads. In 2006 when the Council's Licensing Policy was first introduced, the CIZ designation was made in response to the negative impact of visitors' behaviour experienced by residents living around the Village. They had described instances of alcohol fuelled Public Nuisance occurring on a regular basis; examples included noisy, inconsiderate, and rowdy behaviour by groups and people who had had too much to drink, disturbance late at night (including sleep disturbance) from noise from visitors returning to their cars, shouting, slamming car doors etc., littering, antisocial parking preventing residents' access to their homes, damage to parked cars and unpleasant antisocial behaviour in the street and towards residents and their property.

1.5 In 2006, the incidents experienced in Wimbledon Village contrasted somewhat with those occurring in the Town Centre where the concentration of licensed premises is higher. Alcohol related incidents

reported in the Town also included criminal activity such as violence, assaults and antisocial behaviour which involved frequent police and ambulance call outs. Since Licensing Policy includes the Prevention of Crime and Disorder and the Prevention of Public Nuisance as separate Objectives it was concluded in 2006 that rather than having a single CIZ covering both Wimbledon Village and Wimbledon Town Centre there should be two separate Zones, albeit with boundaries that were almost contiguous, to reflect the fact that the justification for each designation responded to a different Objective.

2. Present Context

2.1 The designation of Wimbledon Village as a CIZ has undoubtedly had a beneficial effect for residents in helping to ensure that the overall number of licensed premises has not increased and in curtailing licensing applicants' efforts to secure generous late night extensions for alcohol sales (see below). However, our understanding is that nuisance remains an issue, particularly at weekends, for residents living in and close to the Village. Examples mentioned to us have included late night noise and disturbance, including from people enjoying licensed outdoor areas, or returning to their cars in residential roads and leaving noisily. Littering is also raised; as people leave the Village, empty or partly empty bottles of beer and/or wine are frequently left on pavements, often resulting in broken glass, and cans and bottles are sometimes thrown into gardens or stuffed into boundary hedges. Residents have also complained that visitor parking often means that if they return late they cannot find anywhere to park near their home or that antisocial visitor parking prevents access to their property. Damage to street furniture in the Village has also been mentioned as well as, on occasion, unpleasant anti-social behaviour by inebriated people.

2.2 In recent months, the government's Covid-19 restrictions have either prevented or severely limited opportunities for indoor social gatherings in licensed premises. As a result, one consequence of these restrictions has been the growing popularity of Wimbledon Common as an outdoor destination for visitors; it directly adjoins the Village CIZ and with no gates or fences it is one of the few open spaces in the local area which permits unrestricted access on a 24/7 basis. We understand that the numbers of visitors to the Common are now significantly higher than ever before and whilst many are coming in the daytime simply to walk, enjoy the open space and/or to take exercise, with the easing of restrictions to permit outdoor gatherings, there are increasing numbers who come later in the day and in the evenings to socialise and to eat and drink "al fresco"; we understand that gatherings where alcohol is available are regularly taking place. Many of these groups stay until late at night, making a lot of noise (music is often played) which travels widely into surrounding residential areas and when they go they leave large quantities of litter, including empty alcohol bottles and cans, both on the Common itself and in nearby roads. There has also been evidence of the use of recreational drugs. The age of the attendees is not known but it is possible that some will be under age. Police have also been called to the Common on several occasions. We do not know if arrests have been made but the fact that police intervention has been required at all is an indication of the serious concerns which this behaviour, invariably fuelled by alcohol, is causing.

2.3 Specifically, on 26th June 2020, a very large gathering took place on Rushmere which is one of the largest of the open areas on the Common and surrounded on three sides by houses. To quote (with her permission) from a report of the event at the time from one resident, [REDACTED], whose home in Parkside Avenue is some distance from Rushmere:

"tonight the noise was louder and more widespread and then at around 10pm the sirens from the emergency services eventually lured me to see what on earth was going on. I counted at least x3 ambulances, x6 police cars, x5 police Vans at the northern end of Rushmere. Groups of x8, x10, x12 young adults were dispersing in all directions away from the area. The Village was heaving of course, Friday nights normally attract a partying crowd."

There are concerns that due to ongoing closures of nightclubs and indoor party venues, and the lack of alternative, accessible open spaces in the wider area, it is likely that Rushmere will continue to attract similar gatherings in the future.

2.4 There are 5 shops in the Village CIZ which are licensed to sell alcohol for consumption off the premises. In addition many of the licensed restaurants, pubs and bars in the Village are also licensed to sell alcohol for consumption off the premises. A number of restaurants and cafes are also selling take away food. All are within very easy reach of Wimbledon Common, especially Rushmere.

2.5 As the data relied upon in the CIA considers incidents taking place between April 2019 and February/March 2020 there is no reference to any of the above events or their impact in the CIA's

analysis of the present circumstances relevant to the Wimbledon Village CIZ. These must be given due consideration.

3. Effects of the CIZ designation in Wimbledon Village and Implications of withdrawal

3.1 Since 2006 the overall number of licensed premises within the CIZ has not changed significantly although many of these premises have changed hands. There have been a number of licensing applications where incoming operators have sought to introduce new trading models with different opening hours. Typically, applicants have initially sought permission for late night opening until at least midnight every day except Sundays, but in all such cases, thanks to the CIZ designation, objections from residents have been given due weight and these proposals have been withdrawn or significantly curtailed. Late night opening (usually to midnight) if permitted at all has been restricted to Fridays and Saturdays and with a requirement that alcohol is only sold with table service meals. In some cases, the need for a Hearing before the Licensing Sub Committee has been avoided altogether because applicants have been prepared to negotiate with residents to agree suitably modified proposals which meet concerns raised.

3.2 Residents value the protection which the CIZ designation has provided. As noted above, the overall number of Licensed Premises in the Village has not changed significantly since 2006 and a degree of consensus now exists amongst operators as to the hours and terms for alcohol sales across the Village. Residents consider that a reasonable balance has been achieved between supporting the promotion of the business economy of the Village and the amenities of the residential community. At Hearings when applications have been contested, successive Licensing Sub Committees have reflected residents' concerns in their decisions. It should also be noted that the CIZ designation has been confirmed without question on each review of the Council's Licensing Policy.

3.3 With clear evidence that the CIZ has been working effectively to protect their interests and amenities, residents do not accept that there is no longer any need for that protection to continue. Given the approach commonly adopted by incoming operators to seek extensive late night opening permissions, residents have good reason to believe that this practice will continue, and will probably be encouraged, following any withdrawal of the CIZ designation. In any event, as Lockdown restrictions ease it seems inevitable that operators in the hospitality sector will want to maximise trading opportunities, including seeking longer opening hours. Inevitably, going forward, it will be far more difficult to challenge such proposals without the protective Policy restrictions which CIZ status affords. We are not reassured by the view in the CIA that despite the loss of CIZ status, each application would be considered "on its individual merits". Without a CIZ designation, the cumulative impact of the density of existing licensed premises in the vicinity will no longer be a relevant factor. In any event it seems self-evident that applicants will cite the withdrawal of the CIZ to demonstrate that the Council considers that within the Village there is insufficient evidence of nuisance etc to justify a restrictive approach to their application.

3.4 In addition, the retention of the Wimbledon Town Centre CIZ which the CIA recommends (and which we support) will only serve to create an unfortunate contrast in the context of Licensing issues if the Village CIZ is withdrawn. Operators will be encouraged to open in the Village rather than the Town to exploit the more flexible Licensing Policy terms which will apply, especially in relation to late night opening. More visitors will come, including late night revellers migrating up Wimbledon Hill from the Town to take advantage of the longer opening hours which will be available. In summary, the absence of CIZ controls in Wimbledon Village will only encourage a shift towards a new "night time economy" throughout the week. This will detrimentally affect residents and radically change the character of the Village for the worse.

4. The Cumulative Impact Assessment

4.1 Licensing Policy is framed to promote the Licensing Objectives which include the Prevention of Crime and Disorder and the Prevention of Public Nuisance. Each of the Licensing Objectives, whilst addressing distinct and separate issues, is of equal weight for the purposes of Policy formulation and implementation. Unfortunately in our view, the CIA's analysis appears to focus exclusively upon the incidents relevant to the Prevention of Crime and Disorder and presents an assessment of "evidence" relating to the Wimbledon Village CIZ in that context but no other. In our view this approach is flawed because it ignores the reasons, namely Public Nuisance incidents, for which as noted above, the Wimbledon Village CIZ was designated as a separate CIZ from the Town Centre.

4.2. The Licensing Objective of the Prevention of Public Nuisance needs more careful analysis than the CIA offers in the context of the Wimbledon Village CIZ. By their nature, the majority of instances of nuisance, in particular those described by Village area residents, such as late night noise, sleep disturbance, littering and antisocial behaviour, whilst distressing and sometimes resulting in damage to property, seldom cause physical harm to residents or lead to requests for the intervention of police, ambulance or other authorities. It therefore follows that the lack of data referencing nuisance incidents should not be taken as evidence that these nuisance incidents have not taken place; it merely shows that they have not been reported. Moreover, for the same reason the lack of data cannot justify an assumption that such incidents will not occur again. Given the density and popularity of Wimbledon Village's licensed premises, the continuing widespread availability of alcohol and the proximity of residential property it seems inevitable that there is an ongoing risk that these same nuisance incidents will continue to occur. That risk justifies a continuing response in the form of CIZ protection.

4.3 The analysis in the CIA of the Wimbledon Village CIZ is brief. It refers to data from police and ambulance call outs in Village Ward, referencing low recorded levels of incidents under these headings:

-) violence with injury – non domestic
-) ambulance call-outs for alcohol
-) ambulance call-outs for assaults, and
-) antisocial behaviour complaints to the police.

As these are all matters which would properly be considered as examples of Crime and Disorder for the purposes of Licensing Policy, the CIA suggests that the Ward's low levels of incidents in each case cannot justify continuing designation of Wimbledon Village as a CIZ. However, as noted above, since the Wimbledon Village CIZ was designated in response to issues of Public Nuisance, it seems wrong to consider, and with such great emphasis, evidence relating to a Licensing Objective which has not been relevant to the Village CIZ from the outset. The CIA offers little, if any, analysis of issues of Public Nuisance because no efforts have been made to investigate these matters with affected local residents until this Consultation.

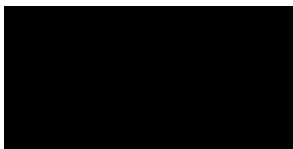
4.4 Due weight must however be given to the more recent incidents described above which have involved police and ambulance attendance on Wimbledon Common. These incidents post-date the information considered in the CIA but are directly relevant to any analysis of the impact of the widespread availability of alcohol in Wimbledon Village.

4.5 The residents' survey data relied upon in the CIA cannot in our view be considered as valid evidence that there is now a widespread acceptance that the Wimbledon Village CIZ designation is no longer necessary or wanted by local residents. The survey was a sample survey of residents across the whole borough which would only have included a small number of residents from Village Ward. There is nothing to suggest that this was a representative sample especially of those living in or around the Village who are directly affected by Nuisance issues. In any event, questions relating to perceptions of crime and disorder and, in that context, personal safety are not directly relevant in the context of the Village CIZ where the Prevention of Public Nuisance was the priority upon which the CIZ was founded. It would appear that no questions were asked relating to residents' experience of, or worries about ongoing levels of a range of public nuisance incidents which would justify a CIZ designation. In addition, as far as we are aware, when the CIA was being prepared, officers did not seek the views of WURA and/or of any local Residents' Association in relation to any of the issues under consideration.

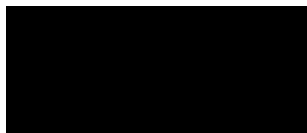
Conclusion

The beneficial effects of the CIZ designation in Wimbledon Village are much valued by residents and there are good reasons to believe that those benefits will be reversed if the designation is withdrawn. As the volume and density of licensed premises and the proximity of residents' homes remains unchanged since 2006, the vulnerability to alcohol fuelled nuisance incidents will continue. Accordingly, we do not believe that removing the designation of Wimbledon Village as a Cumulative Impact Zone for the purposes of Merton's Licensing Policy is justified. The designation should be renewed along with those for Wimbledon Town Centre and Mitcham.

Yours sincerely



PARKSIDE RESIDENTS' ASSOCIATION



Sheila Brass
Licensing Section
London Borough of Merton
Civic Centre
London Road
Morden, SM4 5DX

5 September 2020

Dear Ms Brass

Consultations: Licensing Policy 2021-2026 and Cumulative Impact Assessment

I refer to my representation dated 16th August 2020 (a copy of which is attached for ease of reference) when I listed this Association's objections to the proposal to withdraw the designation of Wimbledon Village as a Cumulative Impact Zone ("CIZ") in the revised draft of the Licensing Policy – a proposal which is based upon the analysis in the Cumulative Impact Assessment ("CIA") circulated with the draft Policy.

In view of the premise in the CIA that there is insufficient evidence to justify retaining the Wimbledon Village CIZ, which we refute, I wish to add this supplemental note to my representation with further comments relating to the Public Nuisance issues being experienced in the vicinity of the Village CIZ.

In paragraphs 2.2-2.5 inclusive of my representation I referred to an emerging issue of incidents of Public Nuisance taking place frequently on Wimbledon Common:

"... we understand that gatherings where alcohol is available are regularly taking place. Many of these groups stay until late at night, making a lot of noise (music is often played) which travels widely into surrounding residential areas and when they go they leave large quantities of litter, including empty alcohol bottles and cans, both on the Common itself and in nearby roads. There has also been evidence of the use of recreational drugs. The age of the attendees is not known but it is possible that some will be under age. Police have also been called to the Common on several occasions. We do not know if arrests have been made but the fact that police intervention has been required at all is an indication of the serious concerns which this behaviour, invariably fuelled by alcohol, is causing.

I also cited a specific alcohol related incident with large numbers of young people which involved police intervention and ambulance attendance on Rushmere Common late at night on 26th June.

Since my representation a number of residents have been in touch with me to confirm having witnessed this type of activity on many evenings and I understand that references have been made to them in representations submitted to you. However, it may well be the case that Council officers, including the Licensing team, may have been unaware of nuisance etc. incidents taking place on the Common because it is not Council owned land and there will have been no Council involvement in the response, as would occur if, say, the same incidents had taken place in Council owned parks or open spaces. Wimbledon and Putney Commons are owned on the community's behalf by Conservators and have charitable status; their management is funded by a Levy paid by local residents, donations and grants. When residents complain about nuisance incidents on the Commons, they contact the Conservators' Office not the Council, and it is the small staff of Rangers and Keepers who handle those issues (eg litter collection, damage repairs, cleaning etc) which do not involve police intervention.

This is a link to the recently published Minutes of the 2020 Annual Open Meeting reporting Questions and Answers to the Conservators. Please see in particular Questions 6 and 8, and the Officer replies, which relate specifically to the Nuisance issues I have described:

<https://www.wpcc.org.uk/downloads/annual-open-meeting-/wpcc-annual-open-meeting-ga-aom-july-2020-final.pdf>

In addition, this is a link to the Conservators' August 2020 Media Release which includes photographs of the litter after some of the late night partying which has taken place on Rushmere: <https://www.wpcc.org.uk/downloads/media-releases/wpcc-media-statement-august-2020.pdf>

The Commons are a unique and much valued resource for our community, free, open and accessible to all. The Covid-19 pandemic has highlighted the importance of exercise and outdoor activity for physical and mental health and the significant increase in visitor numbers underscores the valuable role which the Commons plays in supporting the community's response and long term recovery.

However, as the evidence I have shown above confirms, this important resource and amenity is being exploited, particularly late at night by groups of people, with antisocial behaviour and nuisance fuelled by alcohol, frequently taking place. The Village CIZ directly adjoins Rushmere Common and there are easily accessible routes along residential roads between Rushmere and the Village with its many off licences and licensed premises where off sales are permitted. Alcohol can easily be purchased. Drinking which starts in the Village can also continue, indefinitely and uninterrupted, on Rushmere and elsewhere on the Commons. The nuisance impacts not just on residents living around Rushmere (there are residential roads on three sides) but also on residents across a wide area in and around the Village because of the noise, antisocial behaviour etc which occurs as the partygoers eventually leave.

I have already noted in my original submission that the analysis of "evidence" considered in the CIA and upon which the recommendation to withdraw the designation of the Wimbledon Village CIZ is based, is flawed because no attempt has been made to investigate ongoing issues of Public Nuisance (which residents confirm take place). The Prevention of Public Nuisance (not the Prevention of Crime and Disorder) was the Licensing Objective upon which the CIZ designation was originally made. The CIA has also not addressed any of the Public Nuisance issues I have mentioned in this or my original submission in relation to Wimbledon Common. But they are directly relevant to the analysis which is required in any CIA. This significantly undermines the CIA's recommendation for withdrawal of the Village CIZ.

There may be a view that the current problems on the Commons are temporary and perhaps unique to the Covid-19 context. We disagree. Even if the gatherings and parties decline in colder weather it seems likely that it will be a considerable time, and well into the life of the renewed Licensing Policy, before indoor party venues for large groups will be permitted to operate on the terms enjoyed in the past. It will also be some time before public confidence in the safety of such venues is restored. In the meantime, as I have noted, the Commons are experiencing more visitors than ever before. As there will always be warm and/or dry evenings in every Spring, Summer and early Autumn, we have to accept that for some years to come, outdoor partying on the Commons will continue to be a popular option.

It is reasonable for the community to expect the Council to support and help to preserve and protect the unique amenities which the Commons offer to the community. Retaining the Wimbledon Village CIZ will play an important role in restricting the availability of alcohol from new venues and late at night which can then be consumed on the Commons. This is not the time to promote Public Nuisance by relaxing existing restrictions. Residents are looking for a clear signal that they have this support.

Please reject the CIA's recommendation and retain the Wimbledon Village CIZ.

Yours sincerely



WIMBLEDON UNION OF RESIDENTS' ASSOCIATIONS

7th September 2020

Ms Sheila Brass
Licensing Team
London Borough of Merton
Civic Centre
London Road
Morden
SM4 5DX

Dear Ms Brass,

Consultations - Licensing Policy 2021-2026 and Cumulative Impact Assessment

The Wimbledon Union of Residents' Associations ("WURA") has 22 member associations, together representing some 6000 residents, principally in Village and Hillside wards.

In responding to the above Consultations WURA wishes to register its strong objection to the proposal, recommended in the Cumulative Impact Assessment ("CIA"), to withdraw the Cumulative Impact Zone ("CIZ") designation for Wimbledon Village in the forthcoming Licensing Policy which will be introduced in January 2021. Licensing matters feature regularly in WURA agendas and WURA has regularly made representations in contested Licensing applications. In our view CIZ withdrawal will have significant and detrimental impact upon residents and upon the Village itself.

WURA works closely with the Village Business Association and other groups and bodies with a shared interest in supporting and promoting the Village but with the aim of ensuring that a fair balance is maintained between commercial interests and in protecting the amenities of residents.

For many years the high concentration of licensed restaurants pubs and bars in the Village has attracted large numbers of visitors, especially at weekends and many drive here and park in surrounding residential roads. Whilst recognising that these visitors contribute to the Village economy, it is very important to residents that the availability of alcohol from these premises is properly controlled in Licensing Policy.

During the consultations on Merton's first Statement of Licensing Policy in 2004/5, information provided by WURA on behalf of residents was instrumental in leading to the designation of the Village as a CIZ in the Policy in order to promote the Licensing Objective of the Prevention of Public Nuisance. Residents had cited many examples of alcohol related Public Nuisance incidents which were taking place regularly in and around the Village. These included inconsiderate, noisy and rowdy behaviour, by drinkers standing on pavements outside premises or as they moved from one venue to another, disturbance late at night as

residents were woken up by noise from visitors returning to their cars, shouting, slamming car doors etc., littering with broken glass often left on pavements, antisocial parking blocking access; and unpleasant antisocial behaviour in the street, and towards residents and their property.

The CIZ designation in the Village has been confirmed on each renewal of Merton's Licensing Policy (until now). It has undoubtedly had a beneficial effect in that the overall number of Licensed Premises has not changed and in contested Licensing Applications residents' objections have been given due weight with speculative requests for late night opening invariably refused or restricted to Fridays and Saturdays and tied to the provision of late night refreshment with table service. Residents feel that a fair balance has been achieved between the interests of the business and residential communities. This balance and community spirit is reflected by the fact that WURA is a prime mover on the Visit Wimbledon Village group which is chaired by Councillor Najeeb Latif and on which the council is represented by Paul McGarry. The aim of this group is to encourage commercial activity while maintaining the character of the village neighbourhood.

The principal argument in the CIA for withdrawing the Village CIZ is that there is insufficient evidence to justify its retention. However, it will be noted that the evidence cited in the CIA details records of low levels of incidents from police and ambulance call outs for alcohol related incidents which are typically examples of Crime and Disorder. The Village CIZ was not designated in response to Crime and Disorder issues and so it seems wrong that it should be assessed now against evidence of that nature. No evidence has been sought from residents to establish what nuisance issues are taking place, but the absence of such data does not justify the CIA's apparent assumption that Nuisance is not happening.

The Licensing Objectives include both the Prevention of Crime and Disorder and the Prevention of Public Nuisance and each is of equal weight when formulating and implementing Licensing Policy. The failure of the CIA to properly investigate and address Public Nuisance issues in response to which the Village CIZ was designated demonstrates to us that the analysis is flawed and should not be used to justify withdrawing the Village CIZ designation

Our understanding of the information to be addressed when preparing a CIA is that residents' experience should be considered. The CIA refers only to a sample survey from 2019 giving views from some residents on perceptions of crime and personal safety etc. As a sample survey it only included a very small number of Village area residents and crucially it did not address any nuisance issues which are key to the Village in a licensing context.

In fact, WURA's understanding is that nuisance, fuelled by alcohol, does continue to be an issue in the Village and surrounding area. Anecdotally, it has been reported to us (and noted in submissions on Licensing applications and in this consultation) that residents are still facing late night noise and sleep disturbance, antisocial behaviour, disturbance, littering and visitor parking issues. There have been reports of petty vandalism with damage to street furniture and to parked cars. Most of these incidents whilst very annoying, tend not to be reported to the police or the Council (as one resident put it "what could they do after the event anyway?") so it is not surprising that no records are available.

However, since late May, as Government lockdown restrictions have eased, many more visitors have been coming to enjoy the open spaces on Wimbledon Common, particularly Rushmere which adjoins the CIZ boundary. An emerging issue is the numbers of people who are using the Common for social gatherings and parties, especially late at night. Alcohol is being consumed, (including probably by people under age) music is often played and the noise and disturbance carries across a wide area including when the partygoers eventually leave. Some are lighting fires for barbecues, damaging woodland, grassland and plants etc. The Commons' staff have been struggling to cope with the large quantities of cans, bottles, broken glass and litter left behind from these parties. A particularly serious incident took place late at night on 26th June which involved the Commons staff calling in a large number of police and 3 ambulances.

I am a resident living close to Rushmere Common. I am also part of the team that looks after the gardens of the War Memorial. I walk across this area daily to the Village. I can personally attest to the antisocial behaviour and littering problem which is now taking place. There have been mountains of litter, most of it alcohol-related, for the staff and volunteers to clear such that the conservators of Wimbledon & Putney Commons have resorted to trying to raise additional emergency funding to cover the extra costs. I volunteer as a litter picker, work with the Conservators to address the litter problem etc and am a member of the Commons' Stakeholder Group which has regularly discussed this issue. This area needs all the help it can get to reduce the levels of public nuisance.

In addition, I can confirm from my own experience that residents witnessing these incidents will invariably report them to me and to the Conservators' office, not the Council as the Common is not Council land and the management is dealt with by Commons' staff in the first instance. It is unlikely that any records will be available to Council officers because the Council is not involved in the response.

The volume of this antisocial activity has been acknowledged on the Conservators' website: <https://www.wpcc.org.uk/downloads/annual-open-meeting-wpcc-annual-open-meeting-qa-aom-july-2020-final.pdf> (the minutes of the Q&A at the 2020 Open Meeting – questions 6 and 8 with residents asking about the response to the late night partying etc.) and: <https://www.wpcc.org.uk/downloads/media-releases/wpcc-media-statement-august-2020.pdf> (the August 2020 Media Release with photos of the litter after late night partying etc.)

As further evidence of the problem which is taking place on and around the Common, the Metropolitan Police have announced that an order (which gives police enhanced powers of crowd dispersal) is currently in place under S35 of the Anti-Social Behaviour, Crime and Policing Act 2014 until 20.30pm on 7th September "in view of large crowds holding unlicensed music events". The order, which will only have been required as serious disturbance is anticipated by police intelligence, includes Wimbledon Common, Southside Common, Parkside and other access routes to the Common.

There are 5 shops in the Village with off licences and the majority of the remaining licensed premises are also licensed to sell alcohol for consumption off the premises. Take away alcoholic drinks are on offer. In short, it is not difficult to buy alcohol in the Village to take away and drink on the Common at leisure, including until very late at night. Whilst it is likely

that in the colder months, these parties will be less frequent, there is every reason to assume that this popular activity will be revived next year and thereafter in warmer weather. As a free and accessible outdoor space with the opportunity to party until late at night the Commons has unique attractions especially if, post Covid-19 the safety and viability of indoor party venues remains in doubt.

The Wimbledon Village CIZ has worked well to protect residents' interests and amenities, but it is not accepted that this should mean that there is no longer any need for that protection to continue. One might say "it ain't broke, so don't fix it". Cancellation of the CIZ will in our view only encourage more applications for late night opening because of the less restrictive Licensing Policy provisions which will be in force. Incoming operators invariably apply, speculatively, for extensive late night opening permissions and post lockdown it is reasonable to assume that existing traders will want to maximise their trading opportunities with longer hours as well. This will adversely affect residents and will change the character of the Village. We are not reassured by the suggestion in the CIA that without CIZ protection each new application "will be considered on its merits". A key element of the special policy in a CIZ is the recognition of the cumulative (and negative) impact of the density of existing licensed premises, and not the merits of an individual applicant's proposal. Without a CIZ, as we understand it, that density and cumulative impact is not a relevant consideration. In any event if CIZ designation is withdrawn it seems likely that applicants will be quick to point out that in formulating the new Policy, the Council had satisfied itself (notwithstanding the evidence being provided in this Consultation) that residents' concerns were insufficient to justify a restrictive approach.

WURA supports the recommendation in the CIA that the Town Centre CIZ is retained, noting the incidents of crime and disorder that have been recorded. However, an unfortunate consequence, if the Village CIZ is removed, is that this will highlight the Village as an area where late night drinking will be permitted, encouraging a "night time economy". This is not what residents want for the Village as it will only serve to exacerbate the existing problems which residents have to deal with. It will also radically change the character of the Village for the worse. It is another reason to renew, not cancel the Village CIZ designation so that the town and the Village are operating on the same terms.

The beneficial effects of the CIZ designation in Wimbledon Village are much valued by residents and there are good reasons to believe that those benefits will be reversed if the designation is withdrawn. As the volume and density of licensed premises and the proximity of residents' homes remains unchanged since 2006, the vulnerability to alcohol fuelled nuisance incidents will continue. Accordingly, we do not believe that removing the designation of Wimbledon Village as a Cumulative Impact Zone for the purposes of Merton's Licensing Policy is justified. The designation should be renewed along with those for Wimbledon Town Centre and Mitcham.

Yours sincerely



5 September 2020

WEHRA Input: Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

This provides you with views of Wimbledon East Hillside Residents Association (WEHRA) on the draft **LB Merton Licensing Policy 2021-2026 and Cumulative Impact Assessment**.

WEHRA represents 800 households to the northeast of Wimbledon town centre. Our mission is 'to *preserve, protect and enhance our community*'. WEHRA worked with local councillors and the community to establish the town centre and village **Cumulative Impact Areas** alongside changes in Licensing away from the Magistrates Courts in the early 2000's. WEHRA designed a 'Disturbance Diary' system, whereby local people spent time in and recorded general incidents of un-neighbourly and/or bad behaviour by venue/by person, during evenings from 9 pm and into the night in the town, recording incidents by hour. WEHRA periodically revisits the Disturbance Diaries, when problems arise, such as when a venue(s) appears to be violating conditions of their Licence, or when litter and residue from the night time economy becomes a liability to community wellbeing.

We live in close proximity to licenced venues, and the CPZ parking charges on our roads expire at 6:30 pm. As a result, we have a large number of 'evening and late-night visitors' parking on our roads. Council Licensing Officers are well aware that our neighbourhood has many concerns with the existing Licencing Policy, as we have kept them informed, as incidents and problems arise.

Following are four major concerns with the draft Policy that we would like you to consider. Detailed comments follow, section by section, for consideration as amendments to the final published document. Thank you in advance for your time and consideration of our views.

TOPLINE CONCERNS WITH DRAFT LICENSING POLICY TO BE ADDRESSED

WEHRA has four major concerns with the draft Licencing Policy and Cumulative Impact Assessment, that we request be addressed prior to publication:

- 1) **We agree the Wimbledon town centre CIA must be continued. The volume of policing and litter issues alone is evidence of this need. We are concerned about the proposed removal of the Wimbledon Village CIA, as the recommendation is based on an incomplete summary of evidence, implying an absence of problems.** The fact is a significant concern with licenced premises exists in the Village with Public Nuisance. Has the Committee visited the Village recently or read in the press about serious, on-going problems in its public spaces? Evidence exists, but has not been included in the report, including total police/emergency services callouts, records of ASB/public nuisance from thousands of regular outdoor drinkers, many underage, that did not get a mentioned. See Detailed Comments below and PRA letter (Attachment A)
- 2) **We request the Council acknowledge the importance of day-parts in relation to Licenced premises. Generally, the ‘night-time economy’ that Merton Council talks about is a MYTH. In reality it is a DIS-ECONOMY.** A healthy mix of different venues allows manageable daytime, evening and night-time economies, serving different audiences at different times/days of the week. When that mix is out of balance, as regularly happens here, it can ruin a town. Finally, given the town is ‘one long high street’, with homes immediately behind commercial premises, most licenced activity should cease later-evening (11 pm) weekdays, and midnight on Saturday/Sunday. A robust economic assessment is needed to quantify the high economic and social costs of late-night activity, reducing revenues, and possibly even causing a net cost to the Council.
- 3) **Given the change in Licensing Policy requiring evidence of *serious problems*, we request the Licensing Officer provides a Council Website PORTAL for local residents, visitors and businesses to record evidence over time.** Such a File would allow robust monitoring of general problems associated with individual Cumulative Impact Areas and also the wider borough. Such a PORTAL would provide a helpful summary, over time, of general concerns with alcohol-related venues/visitors that affect local residents. To date we’ve been told to simply ‘keep a record ourselves.
- 4) **Police/Emergency callouts and Incident data provided in the draft Policy are incomplete and lack transparency.** WEHRA has statistics published over the years confirming the many problems with alcohol consumption in Merton. In the draft Policy 2021-2026 such evidence is thin on the ground, and maps difficult to read. The absence of a formal report undermines the argument to remove the Village CIA. All statistics available that are linked to overindulgence/alcohol, such as emergency services/NHS hospital ER/police/public health/street cleaning data - should be incorporated in the 2021-2026 Policy. This will confirm that Wimbledon town and Village warrant continuation as CIAs. Further, the ‘Residents Survey’ of 1,000 people of which one- third were under 18 (!) is a poor indication of satisfaction with current policy. The sample is not significant, not as reliable read of a population of over 200,000 people. The Council must conduct professionally designed surveys in future, or don’t bother undertake surveys at all.

FOLLOWING ARE FURTHER COMMENTS, BY SECTION:

Introduction (1.7)

The introductory paragraph is muddled and contradictory; it should be clear and specific. Surely the top priority for LB Merton is to ensure the well-being of all Merton's residents. Here is a suggested improvement:

Merton Council's strategic objective to make Merton a healthier place for all, by:

**Promoting a high quality, safe suburban environment,
Providing new homes and associated hard infrastructure and also a social infrastructure, and
Robustly mitigating and adapting to climate change and with improved air quality**

**Merton also has an obligation to ensure the borough is well-connected and accessible, and that it remains economically viable.
Merton will strive to build a stronger, more sustainable economy throughout the borough.**

Merton's Licensing Policy is an integral element of the Council's strategic objective.

Introduction (1.10)

This para is about the delicate balance between the rights of residents and the 'interests of commerce'. Language used should describe the primary stakeholders in Wimbledon and indeed other areas in Merton as **local residents**, not as 'commerce.' It is wrong to suggest that residential amenities should be compromised, and possibly further compromised, in the interest of 'commerce' related to alcohol/licensing activity. **The balance to be struck must be 'yes to commerce, without jeopardising existing residential amenities'.**

Please amend the first sentence suggesting it is right to "balance the interests of commerce with the rights of residents to enjoy their homes and locality without being unreasonably disturbed." Merton residents have a *human right to quiet enjoyment*. There is no such thing as 'being

unreasonably disturbed'. Eg: If a drunk parked his car outside my home, and then slams his door, shouts and vomits at 3 am, waking my household, it is a 'reasonable disturbance'. Please re-draft this sentence to include residents' right to quiet enjoyment.

Visitors come to Wimbledon because of the amenities presently available. If you – by your decisions - draw in more and more visitors principally for drinking/licenced activities, you change the nature and character of the area. Given Merton has 15 years' experience of the impact of licenced premises in Wimbledon town, we all know that generally means any more licenced premises will be to the detriment of local residents and local economy.

MetPolice can barely manage the later night activity that is operating here in Wimbledon town centre today. The street sweepers are exhausted after clearing away the food waste/vomit/broken bottles, even blood from our current late-night visitors. Until a better mechanism to control drinkers including those who abuse alcohol/drugs, no further change in the balance is possible.

We must ask the question: **Where is the council's economic review of the Dis-Economy of night-time activity in Wimbledon?** Calculate the cost of police time to attend to fights/accidents/burglaries/ASB, ambulances and emergency services personnel, St Georges' A&E is full of drunks/drug ODs from Wimbledon and other Merton town centres, damage to trees/public spaces, smashed plate glass windows (one is smashed every two weeks in the town, £2k/window). Damage to planters, trees and street furniture? One must ask - Have these data been intentionally omitted from this perhaps overly 'pro-alcohol' draft Licensing Policy?)

Here is a spreadsheet summarising the paucity of data provided in the draft Policy. From what we have seen in previous years, there is much more, comprehensive information that has been omitted from the report, and we request a full annual analysis, including totals of all police/emergency services incidents throughout our five wards.

	TOTAL 4					TOTAL	
	ABBAY	D'DONALD	HILLSIDE	TRINITY	TOWN		VILLAGE
Ambulance callouts for Alcohol	57	24	32	50	163	21	184
Ambulance callouts assaults	5	0	0	9	14	0	14

Violence w/ injury	49	35	25	72	181	18	199
Violence against person (NA)					80E		80
Anti-Social Behaviour	183	71	126	217	964	80	1044
Noise (comparable data NA)					40E		40
TOTAL BY WARD/AREA	296	130	183	348	957	119	1561
% OF TOWN INCIDENTS	31%	14%	19%	36%	100%		
% OF ALL WIMBLEDON*	21%	9%	13%	24%	66%	8%	100%

*excludes noise and violence against person (only averages provided by Police)

SOURCE: draft Policy (4/19-3/20)

1.11 “An effective Licensing Policy”

The suggestion here is pretty blunt: that the council’s licensing officer should aim to ‘increase the leisure industry provision’. Wimbledon town is a CIA because of the considerable damage licensed premises cause to the residential community. Until there is explicit evidence that existing Licence holders are able to control their drinkers, no further increase in licensed premises should be permitted. Please amend the language to reflect this specific problem, or delete the requirement to increase the leisure provision. This has not been agreed with residents, and it is not in the council’s gift to assert it. As central government asks, **Any decision is on a case by case basis.**

It looks as if **the rebuttable presumption in favour of refusal** for applications within a CIA has been deleted? For the record, as recently as 19 May 2019, the **rebuttable presumption** was very much in the Policy, as confirmed by Cllr Tobin Byers, chair, Licensing Committee. The interpretation may have shifted in the latest Home Office paper, but the language remains.

Email from T Byers to L Terrafranca, 19 May 2019

Many thanks for your email. I will pick and ensure it is dealt with.

In regards to your comment on the planning application, as you are probably aware there is a Cumulative Impact Zone covering the Wimbledon town centre area, so any application for a new premises licence (separate to the planning process) would have to overcome a rebuttable presumption against its granting, which is designed to address the very issue you raise.

Kind regards,
Tobin

**Councillor Tobin Byers
Cabinet Member for Adult Social Care and Health
Chair of the Health and Wellbeing Board**

2.2 "The Borough is ..."

The first paragraph confirms that Merton is predominantly a residential area. However, the assertion that the Village is 'half the size of the town' cannot be correct. The town has far more licenced premises, and many more at much later hours of operation than the Village. (Eg: Look at Ambulance callouts over a year. With 163 ambulances called for alcohol emergencies in Wimbledon town area, and just 21 for the Village. The capacity for alcohol/overindulgence in Wimbledon town is about eight times that of Wimbledon Village.

4.5 Main Principles

Bullet point 5: This suggests Merton's Licensing Policy is not the primary mechanism for general control of nuisance and anti-social behaviour. It is wrong to suggest no link exists between Licences and nuisance, ASB, violence, aggravated assault, theft, criminal damage etc. Please acknowledge that Licence holders are not always perfect in their control of nuisance, ASB and other criminal behaviour of their guests. And there must be a concession that the vast majority of evening/late evening/night time disturbances are very likely to be linked to the Licenced Premises an, for example, the thousands of visitors in the town.

Further clarity is required in this section on day-parts. The draft Policy describes 'a holistic approach to the management of the evening and night-time economy' in LB Merton. Yet no definition of what that holistic approach is. Please add a full paragraph in this document describing the principle dayparts for any food/drink operator. The **daytime** business brings the most footfall, the **evening** is primarily diners in restaurants, and the **night-time** is for repeat-drinking.

Daytime: 7 am until 5 pm. This is prime time for the coffee shops, cafes, lunch time/snack takeaways, tea shops, and restaurants/pubs

Local residents and incoming office workers are main users of these venues, as well as the thousand tourists/students/tennis and other visitors to Wimbledon

Evening: 5 pm until 11 pm. This is the casual dining venues, restaurants, cocktail bars and pubs
This sector is heavily used by both local residents and office workers, meeting up with friends prior to heading home outside the area

Night-time: 11 pm until 3:30* am (*the latest hour of operation in Wimbledon)
This group are primarily NOT WIMBLEDON RESIDENTS. This group from outside the area brings with it the greatest social cost to our community. Not just to local people/children trying to rest, but also to the emergency services, NHS resource and for on-going Policing. Add to that the daily short term damage (street litter/vomit/drug paraphernalia) and longer term damage – ripping up trees, pee/vomit/faecal matter et al in every dark corner of the town. And then all these negatives continuously spilling on to residential roads)
Note: 4-6 am is when all venues must be closed because the Police resources are diminished by this time, and the street sweepers and other maintenance must take place prior to the commuter/school flow commencing from 6 am, lasting until late morning.

Wimbledon demographics are made up of families and mature adults: primarily professionals, often dual-income households with all sorts of hardworking people in many diverse occupations from bankers, professors, doctors, consultants, solicitors, teachers, IT workers, to nurses/care workers, and many thousands of school kids. Most of these people must get up very early and all require a good night's sleep each and every night.

Local residents do not want Merton to be allowed a 'Main Principle' that can be used as a 'get out clause' for the council to wash their hands of responsibility for ensuring a healthy mix of community and commercial areas. Further, the current language could serve as an excuse to be careless and make mistakes by allowing more/too many licenced premises, operating too late into the night, causing too many policing/waste management/social problems. The overall responsibility for the success or failure of a commercial area is not random. The council and the town's BID LoveWimbledon take much credit for anything good in the town; they must also strive to control the considerable damage done in the town from alcohol-related activity, particularly the late night problems witnessed by CCTV cameras but seldom reported.

4.5 Main Principles – Bullet Point 8 – 'Pool of Model Conditions'

This proposal is wholeheartedly supported. We would like to see the draft of these Conditions. There is a great need to include community-serving conditions such as (to name just a few) ...

- Ensuring CCTV covers the entrance and any rear/side access/exit, and also CCTV of bar area and wide angle of venue; and if outside area, CCTV to monitor any untoward behaviour in that area (again, usually drugs)
- Readily sharing CCTV footage to assist Police in identifying drug dealers and other unsavoury activity that the venue and/or town may attract
- Commitment to sweep the frontage of the venue at the close of business each and every day, removing cigarette butts, litter and washing down any spilt coffee/drinks/other remains that are on their own footpath, including such unpleasantness as urine, vomit, blood if in evidence on the footpath outside the frontage of the venue
- Removing tables/chairs/glass/food waste when venue closes, including glasses/bottles left on adjoining windowsills and footpaths

8.4 Licensing Policy

Merton assumes it may grant licences for its own venues, yet Merton Council properties are technically owned by the people of Merton. Please would you modify the paragraph to read something like “any Licence holder will be required to follow the same procedures as any other Applicant, including written commitment to abide by the Conditions established with each individual licence and that a Condition would always be included to ensure no disturbance is caused by their guests, that would be allowed to occur for adjoining homeowners to the council premises”.

9. Cumulative Impact

We note the draft Policy includes the language “to give rise to **serious problems** of crime, disorder and/or public nuisance ...”

For the record, the words ‘**serious problems**’ do not necessarily mean things where blood is involved, like knife crime or GBH. Serious problems may include regular, on-going **Public Nuisance**. (The Licensing Act establishes that each of the four licensing objectives are of equal importance.) In Wimbledon town there is a tremendous QUANTITY and BREADTH of problems: noise, nuisance, litter, blood from fights, windows smashed, and urine et cetera, BECAUSE of so many venues and so many are 11 pm plus hours of operation, when fewer sober people are out to witness bad behaviour as it happens. In addition, we do have a significant number of VERY SERIOUS incidents in the town, and these are more often on Thursday/Friday/Saturday nights, and running into the early hours of the following morning.

It should be noted that it is not just the town that has serious problems associated with licensed premises. Wimbledon Village continues to have very many problems linked to alcohol consumption, and there are thousands of visitors who buy alcohol and consume it not just in pubs and restaurants, but also in all of the public spaces and open spaces throughout Wimbledon, leaving behind bottles, cans, food waste, human waste, drug paraphernalia, etc. **These regular disturbances seem to have been ignored by this draft Policy and must be mentioned in the final approved Policy 2021-2026.** The pandemic is forcing thousands of drinkers onto the Common and on the large grassy acres around Rushmere Pond, where it is openly acknowledged as a significant, serious and on-going public drinking problem as relates to the CIA. It was disappointing that in the Licensing meeting of 9 June 2020 not one member mentioned this serious problem when voting on removing the Village CIA. Have any in the Committee been to the Village or on the common during the lockdown?! The Village CIA should not be eliminated; instead due recognition is needed, of the ongoing problems of Public Nuisance, Public Safety and Protection of Children from Harm from drinking – if only from those thousands (including underage) drinking in public open spaces.

Finally, a Council member of some authority aspires to increase revenue from the Village's bars/restaurants/pubs/off-licensees by inviting 'even more leisure/commercial activity'. See Merton **Youtube** Channel <https://www.youtube.com/watch?v=Y8Ae-A0-yNU> This person does not understand why a Cumulative Impact Area is set up and for what reasons CIAs are kept in place. It is disappointing that committee had to take time to consider removing the CIA for both Wimbledon Village and Wimbledon town, despite the thousands of problems well documented by emergency services, with ambulance callouts, hundreds of policing problems, crime and disorder related to overindulgence in drink/drugs, smashed plate glass frontages, tree branches broken off, other bad behaviour, including much of it on the doorstep of local residents, who are trying to get a good night's sleep. It would be appropriate that the person apologises for not understanding his role on the Licensing Committee – an independent body of Councillors and professionals charged with administering Policy, not re-inventing it.

Further justification for retaining Wimbledon Village CIA is outlined in the attached representation from PRA, a strong Village RA, and member of the Union of Wimbledon RAs. WEHRA supports PRA's rationale for continuation of the Village CIA from Merton's (for PRA Representation, see Attachment A). It would be a grave mistake to remove the Village CIA, given the on-going problems of Public Nuisance and Protection of Children from Harm.

9.2 Summary of CIA's in Merton – Recommendation should be amended to Retain all three CIAs, including Wimbledon Village

Given Home Office changes to the Licensing Act, and shift in interpretation of how a CIA operates, it would be wrong to remove the Village CIA without careful study over a period of 2/3 years, of all aspects of Public Safety, Public Nuisance and Protection of Children from Harm by analysing results of statistical data from the NHS, police and the council waste management team

There is insufficient evidence to justify discontinuing the CIA in Wimbledon Village, especially given the vast social and economic changes brought about by the Covid-19 pandemic, and corresponding need for residents and visitors to socialise outdoors, not just for their own health and wellbeing, but for the mental health of the entire population. We have been locked up for most of 2020, and local/national government should not be jail keepers for its citizens. (See **Attachment B**: BRS Brothers Licence Application, and letter from PC Stevens outlining problems with off-licences near to large open spaces. This is relevant to outdoor drinking problems regularly experienced in Wimbledon Village.)

It must also be noted: There is a large new SPAR grocery/off-licence about to open in Wimbledon Village a few paces from Wimbledon Common, and they plan to apply for a License to sell value- priced wine/beer/spirits in newly converted premises (former LK Bennett clothing). They are hoping you will withdraw the CIA so they are free to sell whatever they choose. The SPAR situation is yet another reason the CIA must be continued during 2021-2026. When the pandemic has passed, and perhaps if SPAR and the other two discount grocery/off-licences - Tesco and Co-Op - have all been in operation for a few years, only then might a new assessment of the CIA be conducted. It is wrong to do so today.

Lastly, WEHRA requests the Licensing Officer be permitted to open a Cumulative Impact Area 'LICENSING COMPLAINTS FILE'. This would be a Council Website PORTAL (ie: not linked to any specific premises, simply filed by the Cumulative Impact Area, and otherwise by Ward).

This would be a GENERAL file, listed for the public to send in their comments/concerns/complaints related to general LICENSING ISSUES in the Borough. There could be a dedicated file for each of the Council's three CIAs, and when the Licensing Officers receive emails/letters relating to CIAs but not to specific Licence Holders, these documents would be retained, stored chronologically, year by year. Given the changes in the ways CIA are to be managed, this would provide the Licensing Officer and Licensing Committee a formal procedure to monitor qualitatively the volume and breadth of 'general complaints, problems, concerns' related to Licensing industry in any given area. Here's an example of what type of information might be recorded in the File:

From: 

Date: 

To: publicspace@merton.gov.uk

Dear Public Spaces, Dear Case Officer,

Outside Wimbledon Library this morning are three big fresh dumps of vomit from Friday night's drunks.

Would you kindly jet wash the footpaths ASAP. It smells bad, and visitors to the town are put off.

The Planning Officer is reminded that Wimbledon already has too many late night venues, and the Council's street cleansing resources are sorely inadequate.

 WEHRA planning and licensing officer



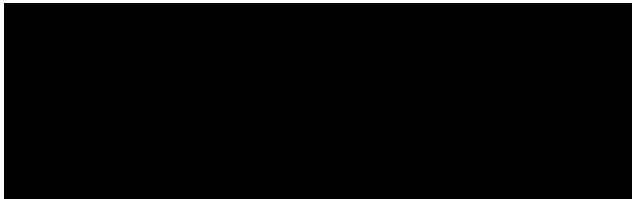
And this charming sight was on the footpath on Wimbledon Hill Road as I walked to church recently. It looks as if a drinker had been wearing a mask and had to vomit. He/she used the mask. This shows what was left on the footpath – It was disgusting, and nobody was willing to clear it away. Eventually I kicked it into the gutter



At present the Officer regularly asks individuals who provide such concerns that they should keep their own files. Surely the Council's best interest would be to keep a master file, if only to be able to represent qualitative concerns from local residents, for use when future draft Policies need updating.

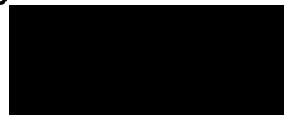
The reason we have a Cumulative Impact Area is because there are problems in a specific area. In order to keep track of the quantity and quality of concerns within a CIA, it would be very helpful to have a dedicated web-page on the Council website, to gather this important information for use when considering issues/renewal of CIAs. **Thank you for agreeing to make this an easy, yet important addition to the draft Planning Policy 2021-2026.**

If you have read this complete document, thank you very much for your time. Before closing, WEHRA wishes to acknowledge the terrific work done by Ms Macdonald, Merton Licensing Officer, Licencing PC Russ Stevens and the NHS and street cleansing Teams who strive to keep us all safe. Thank you all, and to the whole Licensing Team, for your help in ensuring all Merton communities are kept safe, happy and healthy.



Attachment A: PRA Representation to retain CIZ in Wimbledon Village, reprinted by permission

PARKSID CIATION



Sheila Brass, Licensing Section
London Borough of Merton
Civic Centre
London Road
Morden, SM4 5DX

16 August 2020

Dear Ms Brass

Consultations: Licensing Policy 2021-2026 and Cumulative Impact Assessment

Thank you for the invitation to respond to the above Consultations.

We do not have any comments to make upon the suggested revisions to the draft Licensing Policy, other than in relation to the proposal to withdraw the designation of Wimbledon Village as a Cumulative Impact Zone (“CIZ”) which is based upon the analysis in the Cumulative Impact Assessment (“CIA”) circulated with the draft Policy.

We very much regret and strongly oppose the proposed withdrawal of the Village CIZ from the Licensing Policy due to take effect in 2021. We believe the proposal is not justified and do not accept the analysis in the CIA which supports this recommendation. Our reasons are set out below.

1. Background

1.1 The membership area of this Association, which comprises over 300 households, is to the north of Wimbledon Village. It includes Marryat Road and Parkside which adjoin Wimbledon Village High Street, Burghley Road which adjoins Church Road and Peek Crescent, Rushmere Place and Parkside Avenue which are all close to the Village. Residents within our membership area take a keen interest in the preservation of the amenities of Wimbledon Village for the benefit of the local community.

1.2 In 2004/2005 we, along with the Wimbledon Union of Residents Associations (“WURA”) and other residents’ groups, worked with Ward Councillors to contribute towards the formulation of Merton’s Licensing Policy, and in particular the designations of Wimbledon Village and Wimbledon Town Centre as Cumulative Impact Zones. Since then we have continued to take an active interest in licensing matters and have reviewed all licensing applications which have been submitted within the Village CIZ.

1.3 The commercial elements of Wimbledon Village are laid out in a ribbon pattern along the High Street, Church Road and part of the Ridgway, all with residential roads behind them or directly adjoining. There are also a large number of flats at first and second floor level above many of these premises, especially on the High Street. With this proximity, many residents are therefore directly impacted by any noise, disturbance and nuisance issues which occur from the behaviour of customers of licensed premises.

1.4 The high concentration of licensed restaurants pubs and bars has had the effect of establishing Wimbledon Village as a popular “destination venue” attracting large numbers of visitors, especially at weekends. Many of them travel here by car and park in surrounding residential roads. In 2006 when the Council’s Licensing Policy was first introduced, the CIZ designation was made in response to the negative impact of visitors’ behaviour experienced by residents living around the Village. They had described instances of alcohol fuelled Public Nuisance occurring on a regular basis; examples included noisy, inconsiderate, and rowdy behaviour by groups and people who had had too much to drink, disturbance late at night (including sleep disturbance) from noise from visitors returning to their cars, shouting, slamming car doors etc., littering, antisocial parking preventing residents’ access to their homes, damage to parked cars and unpleasant antisocial behaviour in the street and towards residents and their property.

1.5 In 2006, the incidents experienced in Wimbledon Village contrasted somewhat with those occurring in the Town Centre where the concentration of licensed premises is higher. Alcohol related incidents reported in the Town also included criminal activity such as violence, assaults and antisocial

behaviour which involved frequent police and ambulance call outs. Since Licensing Policy includes the Prevention of Crime and Disorder and the Prevention of Public Nuisance as separate Objectives it was concluded in 2006 that rather than having a single CIZ covering both Wimbledon Village and Wimbledon Town Centre there should be two separate Zones, albeit with boundaries that were almost contiguous, to reflect the fact that the justification for each designation responded to a different Objective.

2. Present Context

2.1 The designation of Wimbledon Village as a CIZ has undoubtedly had a beneficial effect for residents in helping to ensure that the overall number of licensed premises has not increased and in curtailing licensing applicants' efforts to secure generous late night extensions for alcohol sales (see below). However, our understanding is that nuisance remains an issue, particularly at weekends, for residents living in and close to the Village. Examples mentioned to us have included late night noise and disturbance, including from people enjoying licensed outdoor areas, or returning to their cars in residential roads and leaving noisily. Littering is also raised; as people leave the Village, empty or partly empty bottles of beer and/or wine are frequently left on pavements, often resulting in broken glass, and cans and bottles are sometimes thrown into gardens or stuffed into boundary hedges. Residents have also complained that visitor parking often means that if they return late they cannot find anywhere to park near their home or that antisocial visitor parking prevents access to their property. Damage to street furniture in the Village has also been mentioned as well as, on occasion, unpleasant anti-social behaviour by inebriated people.

2.2 In recent months, the government's Covid-19 restrictions have either prevented or severely limited opportunities for indoor social gatherings in licensed premises. As a result, one consequence of these restrictions has been the growing popularity of Wimbledon Common as an outdoor destination for visitors; it directly adjoins the Village CIZ and with no gates or fences it is one of the few open spaces in the local area which permits unrestricted access on a 24/7 basis. We understand that the numbers of visitors to the Common are now significantly higher than ever before and whilst many are coming in the daytime simply to walk, enjoy the open space and/or to take exercise, with the easing of restrictions to permit outdoor gatherings, there are increasing numbers who come later in the day and in the evenings to socialise and to eat and drink "al fresco"; we understand that gatherings where alcohol is available are regularly taking place. Many of these groups stay until late at night, making a lot of noise (music is often played) which travels widely into surrounding residential areas and when they go they leave large quantities of litter, including empty alcohol bottles and cans, both on the Common itself and in nearby roads. There has also been evidence of the use of recreational drugs. The age of the attendees is not known but it is possible that some will be under age. Police have also been called to the Common on several occasions. We do not know if arrests have been made but the fact that police intervention has been required at all is an indication of the serious concerns which this behaviour, invariably fuelled by alcohol, is causing.

2.3 Specifically, on 26th June 2020, a very large gathering took place on Rushmere which is one of the largest of the open areas on the Common and surrounded on three sides by houses. To quote (with her permission) from a report of the event at the time from one resident, Mrs SJ Holden, whose home in Parkside Avenue is some distance from Rushmere:

"tonight the noise was louder and more widespread and then at around 10pm the sirens from the emergency services eventually lured me to see what on earth was going on. I counted at least x3 ambulances, x6 police cars, x5 police Vans at the northern end of Rushmere. Groups of x8, x10, x12 young adults were dispersing in all directions away from the area. The Village was heaving of course, Friday nights normally attract a partying crowd."

There are concerns that due to ongoing closures of nightclubs and indoor party venues, and the lack of alternative, accessible open spaces in the wider area, it is likely that Rushmere will continue to attract similar gatherings in the future.

2.4 There are 5 shops in the Village CIA which are licensed to sell alcohol for consumption off the premises. In addition many of the licensed restaurants, pubs and bars in the Village are also licensed to sell alcohol for consumption off the premises. A number of restaurants and cafes are also selling take away food. All are within very easy reach of Wimbledon Common, especially Rushmere

2.5 As the data relied upon in the CIA considers incidents taking place between April 2019 and February/March 2020 there is no reference to any of the above events or their impact in the CIA's analysis of the present circumstances relevant to the Wimbledon Village CIZ. These must be given due consideration.

3. Effects of the CIZ designation in Wimbledon Village and Implications of withdrawal

3.1 Since 2006 the overall number of licensed premises within the CIZ has not changed significantly although many of these premises have changed hands. There have been a number of licensing applications where incoming operators have sought to introduce new trading models with different opening hours. Typically, applicants have initially sought permission for late night opening until at least midnight every day except Sundays, but in all such cases, thanks to the CIZ designation, objections from residents have been given due weight and these proposals have been withdrawn or significantly curtailed. Late night opening (usually to midnight) if permitted at all has been restricted to Fridays and Saturdays and with a requirement that alcohol is only sold with table service meals. In some cases, the need for a Hearing before the Licensing Sub Committee has been avoided altogether because applicants have been prepared to negotiate with residents to agree suitably modified proposals which meet concerns raised.

3.2 Residents value the protection which the CIA designation has provided. As noted above, the overall number of Licensed Premises in the Village has not changed significantly since 2006 and a degree of consensus now exists amongst operators as to the hours and terms for alcohol sales across the Village. Residents consider that a reasonable balance has been achieved between supporting the promotion of the business economy of the Village and the amenities of the residential community. At Hearings when applications have been contested, successive Licensing Sub Committees have reflected residents' concerns in their decisions. It should also be noted that the CIZ designation has been confirmed without question on each review of the Council's Licensing Policy.

3.3 With clear evidence that the CIA has been working effectively to protect their interests and amenities, residents do not accept that there is no longer any need for that protection to continue. Given the approach commonly adopted by incoming operators to seek extensive late night opening permissions, residents have good reason to believe that this practice will continue, and will probably be encouraged, following any withdrawal of the CIZ designation. In any event, as Lockdown restrictions ease it seems inevitable that operators in the hospitality sector will want to maximise trading opportunities, including seeking longer opening hours. Inevitably, going forward, it will be far more difficult to challenge such proposals without the protective Policy restrictions which CIZ status affords. We are not reassured by the view in the CIA that despite the loss of CIZ status, each application would be considered "on its individual merits". Without a CIZ designation, the cumulative impact of the density of existing licensed premises in the vicinity will no longer be a relevant factor. In any event it seems self-evident that applicants will cite the withdrawal of the CIZ to demonstrate that the Council considers that within the Village there is insufficient evidence of nuisance etc to justify a restrictive approach to their application.

3.4 In addition, the retention of the Wimbledon Town Centre CIZ which the CIA recommends (and which we support) will only serve to create an unfortunate contrast in the context of Licensing issues if the Village CIZ is withdrawn. Operators will be encouraged to open in the Village rather than the Town to exploit the more flexible Licensing Policy terms which will apply, especially in relation to late night opening. More visitors will come, including late night revellers migrating up Wimbledon Hill from the Town to take advantage of the longer opening hours which will be available. In summary, the absence of CIZ controls in Wimbledon Village will only encourage a shift towards a new “night time economy” throughout the week. This will detrimentally affect residents and radically change the character of the Village for the worse.

4. The Cumulative Impact Assessment

4.1 Licensing Policy is framed to promote the Licensing Objectives which include the Prevention of Crime and Disorder and the Prevention of Public Nuisance. Each of the Licensing Objectives, whilst addressing distinct and separate issues, is of equal weight for the purposes of Policy formulation and implementation. Unfortunately in our view, the CIA’s analysis appears to focus exclusively upon the incidents relevant to the Prevention of Crime and Disorder and presents an assessment of “evidence” relating to the Wimbledon Village CIZ in that context but no other. In our view this approach is flawed because it ignores the reasons, namely Public Nuisance incidents, for which as noted above, the Wimbledon Village CIZ was designated as a separate CIZ from the Town Centre.

4.2. The Licensing Objective of the Prevention of Public Nuisance needs more careful analysis than the CIA offers in the context of the Wimbledon Village CIZ. By their nature, the majority of instances of nuisance, in particular those described by Village area residents, such as late night noise, sleep disturbance, littering and antisocial behaviour, whilst distressing and sometimes resulting in damage to property, seldom cause physical harm to residents or lead to requests for the intervention of police, ambulance or other authorities. It therefore follows that the lack of data referencing nuisance incidents should not be taken as evidence that these nuisance incidents have not taken place; it merely shows that they have not been reported. Moreover, for the same reason the lack of data cannot justify an assumption that such incidents will not occur again. Given the density and popularity of Wimbledon Village’s licensed premises, the continuing widespread availability of alcohol and the proximity of residential property it seems inevitable that there is an ongoing risk that these same nuisance incidents will continue to occur. That risk justifies a continuing response in the form of CIZ protection.

4.3 The analysis in the CIA of the Wimbledon Village CIZ is brief. It refers to data from police and ambulance call outs in Village Ward, referencing low recorded levels of incidents under these headings:

- violence with injury – non domestic
- ambulance call-outs for alcohol
- ambulance call-outs for assaults, and
- antisocial behaviour complaints to the police.

As these are all matters which would properly be considered as examples of Crime and Disorder for the purposes of Licensing Policy, the CIA suggests that the Ward’s low levels of incidents in each case cannot justify continuing designation of Wimbledon Village as a CIZ. However, as noted above, since the Wimbledon Village CIZ was designated in response to issues of Public Nuisance, it seems wrong to consider, and with such great emphasis, evidence relating to a Licensing Objective which has not been relevant to the Village CIZ from the outset. The CIA offers little, if any, analysis of issues of Public Nuisance because no efforts have been made to investigate these matters with affected local residents until this Consultation.

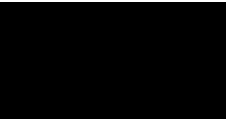
4.4 Due weight must however be given to the more recent incidents described above which have involved police and ambulance attendance on Wimbledon Common. These incidents post-date the information considered in the CIA but are directly relevant to any analysis of the impact of the widespread availability of alcohol in Wimbledon Village.

4.5 The residents' survey data relied upon in the CIA cannot in our view be considered as valid evidence that there is now a widespread acceptance that the Wimbledon Village CIZ designation is no longer necessary or wanted by local residents. The survey was a sample survey of residents across the whole borough which would only have included a small number of residents from Village Ward. There is nothing to suggest that this was a representative sample especially of those living in or around the Village who are directly affected by Nuisance issues. In any event, questions relating to perceptions of crime and disorder and, in that context, personal safety are not directly relevant in the context of the Village CIZ where the Prevention of Public Nuisance was the priority upon which the CIZ was founded. It would appear that no questions were asked relating to residents' experience of, or worries about ongoing levels of a range of public nuisance incidents which would justify a CIZ designation. In addition, as far as we are aware, when the CIA was being prepared, officers did not seek the views of WURA and/or of any local Residents' Association in relation to any of the issues under consideration.

Conclusion

The beneficial effects of the CIZ designation in Wimbledon Village are much valued by residents and there are good reasons to believe that those benefits will be reversed if the designation is withdrawn. As the volume and density of licensed premises and the proximity of residents' homes remains unchanged since 2006, the vulnerability to alcohol fuelled nuisance incidents will continue. Accordingly, we do not believe that removing the designation of Wimbledon Village as a Cumulative Impact Zone for the purposes of Merton's Licensing Policy is justified. The designation should be renewed along with those for Wimbledon Town Centre and Mitcham.

Yours sincerely



Attachment B: Recent Licensing Hearing for BRS Brothers, Mitcham (CIA) with Licensing PC Stevens' letter clearly identifying Police difficulty supervising off-licenses, particularly when near to public open space, in this case Wimbledon Common

Here's the link: <https://democracy.merton.gov.uk/mgAi.aspx?ID=14398>

BRS Brothers, 256 London Road, Mitcham, CR4 3HD

- Meeting of Licensing Sub-Committee, Wednesday 6 May 2020 1.00 pm (Item 4.)



The Licensing Department
The London Borough of Merton Merton Civic Centre,
London Road,
Morden
SM4 5DX

Wimbledon Police Station 15-23 Queens Road London
SW19 8NN

Telephone: Email: Rus

17th March 2020

SW BCU
VW - Merton Borough
VW - Wimbledon Police Station

Re:- Application for Premises Licence at 256 London Road, Mitcham. CR4 3HD

Dear Sir/Madam,

On 27th February 2020, an application was received from Mr Surjit Ram Chopra for a new Premises Licence under Section 17 of the Licensing Act 2003.

The application can be summarised as follows:-

A convenience and mobile phone repair shop at BRS Brothers, 256 London Road, Mitcham CR4 3HD. To sell alcohol from 8am to 11pm daily, for consumption off the premises.

Police wish to make strong objections to this application with regard to all four of the licensing objectives namely:

The Prevention of Crime and Disorder
The Prevention of Public Nuisance
Public Safety
The Protection of Children from Harm

The premises is situated in Mitcham town centre, close to a public green, the Clock Tower, and street market. Mitcham town centre is within the Mitcham Cumulative Impact Zone, the policy specifically relating to Off-Licences. 256 London Road is in the very centre of the CIZ, in an area where crime and anti-social behaviour from street drinkers is a serious problem. Police Officers and Council Wardens deal with incidents of crime and ASB within the immediate vicinity on a daily basis. There are regular incidents of urinating in public, littering, verbal abuse from intoxicated street drinkers who loiter in Mitcham town centre close to the many shops that sell alcohol. Approximately 50m from 256 London Road is Mitcham Clock Tower, this historic landmark is surrounded by benches that have become adopted by street drinkers, behind the benches are bushes that street drinkers use to hide their cans and bottles, and discard them when empty. Members of public, including children feel intimidated and are sometimes verbally abused as they walk past. The local shops report regular petty thefts and loss of business due to street drinkers loitering close by. Despite vast sums of money being spent on the regeneration of Mitcham town centre there is still an overwhelming feeling of poverty and crime in the area due to the constant presence of drunks.

Mitcham town centre does not need, and could not cope with another Off-Licence. At last count there were 10 shops within 300 metres of Mitcham News that are licensed to sell alcohol, all of which cumulatively contribute to alcohol related crime and ASB. There is an existing off-licence shop only 3 doors away at No 250 London Road.

Relevant Crimes recorded in the immediate vicinity over last twelve months:

Assault on female by drunk male whilst sitting outside
Shoplifting of wine
Shoplifting of spirits
Personal robbery of drunk victim

Victim drinking alone outside, robbed and stabbed
Shoplifting of alcohol
Threatening and abusive behaviour from drunks outside
Alcohol related affray

Victim assaulted by street drinkers
Shoplifting of alcohol
Abusive and threatening drunk male in shop
Serious sexual assault
Assault, drunk victim hit over head with bottle, group of drunk suspects
Shoplifting bottles of wine

Shoplifting bottles of spirits
Drunk male assaulted
Shoplifting bottles of spirits
Drunk male abusive, threatening and throwing chairs

It is my absolute belief that any additional shop premises selling alcohol in Mitcham Town Centre

WILL contribute to and exacerbate the existing problems of crime and anti-social behaviour. If BRS

Brothers are granted a Premises Licence, they will increase the quantity and availability of alcohol consumed in the street, and will therefore proportionately increase crime and ASB.

There has not been any pre-application contact with the Metropolitan Police regarding this application. S182 Licensing Act 2003 (Home Office Guidance) encourages early consultation with the Police, and it is normal and sensible procedure to attempt discussion with the Police prior to submission of a Licensing Application. As a result, the application makes no attempt to address the Cumulative Impact Policy. I have had a brief email conversation with the applicant's agent during the consultation period, but due to late receipt of the application and Coronavirus related sickness, a site meeting has not been possible.

I have received a number of offered conditions from the applicant but I do not believe that any of these address the CIP.

The Metropolitan Police strongly urges the sub-committee to reject this application.

Yours Faithfully

Russ Stevens PC 3852SW 191701 Licensing Officer

End

From: [Redacted]

Sent: 07 September 2020 08:45

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: Councillor David Simpson <David.Simpson@merton.gov.uk>; Elizabeth Macdonald <Elizabeth.Macdonald@merton.gov.uk>; Democratic Services <DemocraticServices@merton.gov.uk>

Subject: #Section35 in place for #WIMBLEDON VILLAGE - Input for draft Licensing Policy 2021-2026

URGENT - PLEASE READ

This provides further evidence of serious, ongoing problems associated with drink/alcohol/overindulgence in the Village. It is wrong to remove the CIA in Wimbledon Village, particularly during this very challenging period as we all battle with not just economic uncertainty, also a global pandemic.

Unprecedented times, and not such a time to withdraw support for ANY community's safety and wellbeing. Thank you for retaining the Village CIA, and for more carefully studying all CIAs in future, with a better provision of existent data, by also gathering information on general licensing concerns via a dedicated council Drwebsite PORTAL.

Yours sincerely,

[Redacted Signature]



[View on Nextdoor](#)



[PCSO Dave Haywood, Merton Police](#) PUBLIC SERVICE

S.35 authorised for Wimbledon Common + Parkside, Southside Common, Woodhayes rd, Copse Hill, Coombe Lane, Kingston Bypass, Roehampton Vale + Kingston rd till 20:30 hour on the 7th Sept. This is due to large groups holding unlicensed music events

[Crime and Safety · 6 Sep to subscribers of Merton Police](#)



[Thank](#)



[Private message](#)

[View or reply](#)

[Redacted Content]

From: [REDACTED]
Sent: 07 September 2020 13:56
To: [REDACTED] la.Brass@merton.gov.uk>
Cc: [REDACTED]
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

We live in Wimbledon Village, [REDACTED]. We have been living here since 2006 and are now joining the long list of residents who are strongly opposed to the intended removal of the CIZ status of Wimbledon Village.

We believe the recommendation for the removal of the designation of Wimbledon Village as a Cumulative Impact Zone for the purposes of Merton's Licensing Policy is not justified because:

1. CIZ designation for Wimbledon Village since 2006 has had a beneficial effect in preventing an increase in the number of licensed premises in the Zone and in ensuring that residents' concerns about controlling nuisance etc. are properly addressed in licensing applications. (Most applicants apply speculatively at first for late night opening every night). Removal of the designation will reverse these benefits and will have a long lasting and detrimental impact upon the character of the Village (eg Open Season on new applications for late night opening, new premises opening etc, etc.)
2. The Cumulative Impact Assessment upon which the recommendation is based relies heavily upon an analysis of data relating to Crime and Disorder incidents. These are not relevant to the Wimbledon Village CIZ which was designated in response to incidents of Public Nuisance. The Prevention of Crime and Disorder and the Prevention of Public Nuisance are separate but distinct Licensing Objectives which are of equal value when considering a CIZ designation. They have not been given equal weight in the Assessment.
3. The survey evidence cited in the assessment reporting residents' views on perception of crime, personal safety and other considerations was from a 2019 sample survey across the Borough. It gives neither a representative view in the Village Ward (the sample was too small) nor is it relevant in the context of Village CIZ licensing matters as respondents weren't asked about licensing related issues including their experience of nuisance incidents.
4. By their nature, incidents of Public Nuisance (such as noise and antisocial behaviour) tend not to be reported by residents nor require intervention by the police or other authorities so the absence of incident data should not justify an assumption that there have been no nuisance issues. Residents living in and around the Village say that they do experience ongoing nuisance issues (eg late night noise and disturbance, littering, parking problems and some antisocial behaviour) even if they have not reported them to the authorities.

There is no doubt that things have improved within the CIZ since 2006 however there is a developing and ongoing issue with open air drinking (possibly underage?) and partying on Rushmere. There was a major incident at the end of June when Police and Ambulances were called so that will have been logged. We have no idea where the alcohol is being bought but the simple point is that The Common adjoins a CIZ which includes off licenses and restaurants/pubs/bars with off sales licences. This type of incident could become more frequent if the CIZ were removed and therefore alcohol was more readily available for a longer number of hours.

We hope that Merton Council will refrain from taking this to the next level, i.e. remove the CIZ status for Wimbledon Village.

Sincerely Yours,

A solid black rectangular redaction box covering the signature.

From [REDACTED]

Sent: 27 July 2020 21:04

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila,

We live in the Village Ward and fully agree with the Parkside residents Association objections to the cancellation of the Wimbledon Village CIZ protection.

The PRA committee's view is that the Council's proposal is ill-conceived:

-) The lack of recorded incident data is unsurprising; the Village CIZ was designated in response to nuisance and antisocial behaviour issues, many of which, by their nature, are not reported to the police or the Council but they are still legitimate concerns for protection in a licensing policy. (The "Prevention of Public Nuisance" is one of the stated Objectives in Licensing legislation.)
-) In any event, lack of recorded data is more likely to be a reflection of the effectiveness of the CIZ. Given the numbers of licensed premises in the Village, the risks of late night noise, nuisance and antisocial behaviour will continue and may escalate unless properly controlled by CIZ protection.
-) Withdrawing CIZ protection risks bringing unwelcome change to the Village. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. Do we want the Village to have a "vibrant night time economy" - which is how Wimbledon Town Centre's late night alcohol related problems are frequently, if somewhat euphemistically, described?
-) An important change of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in licensing policy.

We look forward to you reconsidering the current proposal.

Kind regards,

[REDACTED]

From: [REDACTED]

Sent: 06 September 2020 23:03

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass

I am a resident in the Wimbledon Village Ward. I understand that the Council is considering the removal of the special status of a Cumulative Impact Zone which has been applied to Wimbledon Village since 2005. I would strongly object to the removal of the CIZ as a resident for the following reasons:

∩The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.

∩The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.

∩The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.

∩Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.

∩An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

∩Residents living in and around the Village are concerned about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on

Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

- Furthermore, since the easing of lockdown since May/June, there has been a marked increase in litter and food waste around the Common, especially around the Rushmere Pond area, particularly alcoholic glass bottles and cans which are hazardous to children and animals. The imminent opening of a new SPAR convenience store on the High Street which is right next to the Common will also encourage this problem.

As a result I strongly object to the removal of the existing CIZ status and would request that these issues are considered by the Council.

Thank you



From [REDACTED]
Sent: 15 August 2020 08:55
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: CIZ and Wimbledon Village

I am in complete agreement with the points covered by the Chairman of the Parkside Residents Association ([REDACTED]) with regard to any possible changes to the current CIZ rulings with regard to licensing in Wimbledon Village. There has been an improvement in the Village, particularly at night and noticeably at weekends, since the CIZ came into force. I live close to the Rose & Crown Pub and I am confident in saying that I believe they would not want the opportunity to extend their hours other than at the special arrangements normally allowed during the Wimbledon fortnight. My address is [REDACTED] and name

[REDACTED]

From: [REDACTED]
Sent: 06 September 2020 15:02
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

I am writing as a resident on [REDACTED], Wimbledon Village.

I wish to lodge my objection to the removal of the Wimbledon Village CIZ.

The very fact that it has been working, and has seen the reduction of incidents, is the reason why it should remain. The village continues to be a very vibrant area, because commercial and residential inhabitants are able to live side by side under the protections that CIZ has provided.

Please do reconsider the removal of the Wimbledon Village CIZ.

Many thanks.

[REDACTED]

From: [REDACTED]

Sent: Wednesday, August 12, 2020 4:14:31 PM

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment.

Dear Ms Brass,

I am writing to you both as a long term resident (since 1994) in [REDACTED] in the Village Ward and also as [REDACTED] of Moorgate Estates Limited - the owners of a number of commercial and residential buildings in the Village including 70, High Street (the recently refurbished Clock Tower following a lightning strike in July 2019), 65/65 High Street, 76 High Street, 4 Church Road and 1/13 Church Road inclusive.

All these holdings make us one of the larger, if not the largest, Village commercial landlords and we accordingly have a very particular interest in both preserving the unique atmosphere of the Village and also in securing its future long term success and economic viability.

I have spent many years supporting initiatives to enhance the popularity of Wimbledon Village with both residents and visitors alike and I was accordingly very disturbed to read that consideration is being given to the cancellation of its "Cumulative Impact Zone" status.

Since 2005 this status has gone a long way towards creating the environment so loved by all users of the Village – allowing a wide variety of licensed premises and restaurants of varying types (5 pubs of different sizes and styles, some 20 restaurants and a number of off licenses/ convenience stores- more than enough for the most dedicated bon viveur or partygoer by any standards) whilst retaining a modicum of peace for those residential occupiers and owners living in close proximity.

It is interesting that over the last few years the incidence of complaints about night time behaviour from residents of residential properties in our ownership at 70 and 76 High Street has increased dramatically- by and large all the usual alcohol fuelled culprits found in less controlled areas such as noise, violence, theft, urination, plant box destruction etc, etc.

When something as unique as the Village exists why risk reducing it to the levels so sadly found in other parts of the Borough by removing a CIZ status that has served the area so well.

Could I ask you to reflect on the contents of this email and not be influenced by other views which may be less concerned with the destruction of quality of life and more interested with reducing everything to the same less unique level – I assure you this will not result in a happier environment for all Village users and will probably result in a poorer environment for future generations whether visitors or residents.

I am happy to meet both you and the Licensing committee to discuss if you feel it would be helpful.

Yours Sincerely,

[REDACTED]

From [REDACTED]
Sent: 07 September 2020 11:36
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: CIZ Review

CONSULTATION, LICENSING POLICY 2021-2025 and CUMULATIVE IMPACT ASSESSMENT

In the matter of the Council's imminent review of cumulative impact zones, may I offer the following specific thoughts for the Licencing Committee's consideration.

As a Wimbledon resident who has lived for forty years directly between two of the Village's most popular public houses, namely *The Hand In Hand* and *The Crooked Billet*, I can attest to the benefits of the CIZ with the issues of nuisance and late-night noise, both being considerably less of a problem than they were prior to the CIZ's inception.

When any difficulties do arise, we tend to address them directly with the pub managements in the confidence that we have the strength of the CIZ behind us. Consequently the data regarding nuisance and noise which may inform the Committee's decisions in this review would be unlikely to reflect any such complaints, though they are surely still legitimate concerns within Licensing Policy, and sufficient to justify continuing CIZ protection.

The Committee may also care to take into consideration the marked increase in customer numbers since an extension to The Crooked Billet pub in 2014 and a more recent and substantial extension to The Hand In Hand in 2019. That, plus the continuing attraction of the Crooked Billet Green and The Common in fine weather, regularly makes for a large volume of customers within what is a relatively small residential area.

Also, with the current economic challenges facing so many businesses, there is no reason for us to be overconfident that the pubs will not seek licence extensions or other variations, and without the protection of the CIZ our amenities as residents would enjoy less priority than the provisions currently afford us.

I would suggest that the current CIZ is working well here, and performing as the Council intended it to, and that to remove it now could upset the fair balance which exists between the interests of local residents, the pubs and other businesses in the Village Ward.

Thank you for your consideration of these points, which I hope may be helpful.

Yours sincerely,

[REDACTED]

7th September, 2020

From: [REDACTED]
Sent: 07 September 2020 14:47
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment”

Good afternoon,

I am writing in support of your proposal to lift the special status CIZ Wimbledon Village has. The village is such a wonderful place, and whilst we need to respect it's heritage, we need to ensure the future and the challenges that high streets currently presents. It's upsetting to see so many shops and businesses struggling and even closing down.

I was born and am still a resident in Wimbledon village for over 40 years and I feel that the area is desperate for more bars which would attract more visitors and can only thrive with more drinking establishments, especially during Wimbledon fortnight. Wimbledon village is up there as one of the greatest high streets in the country but it's deeply lacking bars, and too many charity shops. I feel this would be an excellent law change to allow more.

Regards,

[REDACTED]

From: [REDACTED]

Sent: 02 September 2020 12:22

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: CIZ WIMBLEDON VILLAGE

Dear Ms Brass

I am a resident of [REDACTED] adjacent to the Hotel du Vin and object to the removal of CIZ designation in the village for all the reasons set out below.

In addition, since the Covid 19 epidemic the adjacent Cannizaro and Village Green have become a widely used leisure destinations particularly at weekends, the former served by the Hotel. If restrictions are lifted this would invite behaviour which would seriously impact the whole area of West Side Common which is after all a Conservation and Residential Area and part of Wimbledon Common. You may recall a few years ago we had to take action with the Hotel to restrain its activities in the Orangery and Car Park related to their events activity, late night drinking, rowdyism and noise and this within the prevailing CIZ restraints.

The argument that there hasn't been any complaints is de facto a recognition that its working not a justification for change. What conceivable justification is there for lifting it?

Yours Faithfully

[REDACTED]

Village area Residents' Associations believe that the proposal to cancel the Wimbledon Village CIZ designation is not justified. These are the main reasons:

-) The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.
-) The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.
-) The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.
-) Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.
-) An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

- J Residents living in and around the Village have spoken of their concerns about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

From [REDACTED]

Sent: 03 September 2020 10:09

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: Councillor Thomas Barlow <Thomas.Barlow@merton.gov.uk>; Councillor Andrew Howard <Andrew.Howard@merton.gov.uk>; Councillor Najeeb Latif <Najeeb.Latif@merton.gov.uk>

Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

Dear Ms Brass

I am astonished to learn that the Council is considering dropping the CIZ for the Village Ward, advancing as a reason "that the CIZ has been successful"! For that success to continue and the Village to remain as pleasant an environment as it has been, the CIZ also needs to continue and I object strongly to its proposed cessation.

[REDACTED]

From [REDACTED]
Sent: 10 August 2020 18:11
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Merton Council Licensing Policy

Dear Ms Brass

The proposed changes to the Merton Council Licensing Policy have come to our attention.

We are writing to object to the proposal as the current situation which has been in place is working satisfactorily, and any relaxation or policy will simply bring us back to the original issues, which in turn will require further mitigation. Furthermore, to attempt any infrastructure changes during a serious pandemic is most definitely not a good idea.

The efficiently working system which you have implemented does not require change.

Many thanks for your consideration.

Yours sincerely,

[REDACTED]

From: [REDACTED]
Sent: 03 September 2020 10:52
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila Brass,

Living in a cul de sac very close to Wimbledon Village High St, we residents witnessed some very unsavoury events towards the end of the lockdown. Takeaway drink was freely being sold, though there were no public toilets. The result was people relieving themselves on our grass verge, and/or sitting drinking on it.

Please consider very carefully the possible outcome of offering licences for late night drinking!

I understand the need for extra business in the village, but due to the above experience of drunken behaviour, I regret that I must object.

[REDACTED]

From: [REDACTED]
Sent: 06 September 2020 09:37
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: CIZ Consultation Licencing Policy 2021-2026. Cumulative Impact Assessment

Dear Ms Brass

I object very strongly to the change of the Licencing policy in Wimbledon Village.
I am a resident in the Village ward and object for the following key reasons:

The current policy has had some success - a reason to keep it not remove it.

There have been considerable problems with alcohol related gatherings on the Common;
particularly adjacent to the Village.

The different policy for Wimbledon Town and Village will result in more alcohol related
gatherings in the Village as people move to the Village to take advantage of the different
policies.

I would much appreciate you taking notice of these comments.

Regards

[REDACTED]

From [REDACTED]
Sent: 02 September 2020 11:18
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: The importance of maintaining the CIZ status of Wimbledon Village

Dear Ms. Brass,

We are very concerned indeed that there is even a suggestion of removing the Cumulative Impact Zone in Wimbledon Village. We have been shocked enough to see the terrible amounts of rubbish on the Common from late night drinking and anything that can be done to lower this and maintain the status quo, or improve it, in Wimbledon Village is vital. We should point out that in more than 15 years in this area, we have never seen a policeman in the village, except going through it in a car at vast speed with the sirens blaring.

We are residents here and the impact of removing the CIZ would be enormous for the following reasons:

-) The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.
-) The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.
-) The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.
-) Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as

well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.

) An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

) We hate to see and hear nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

Please ensure this CIZ protection is maintained.

Yours sincerely,

A black rectangular box redacting the signature of the sender.

From: [REDACTED]

Sent: 02 September 2020 10:55

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

As a resident in Wimbledon Village I am writing to object to the proposed withdrawal of CIZ licensing status for the Village area, especially in comparison to preserving such status in neighbouring Wimbledon Town Centre.

Such a proposal is obviously likely to shift late night drinking and carousing, with all its associated anti-social repercussions, towards the Village area. Why should we Village residents bear the brunt and suffer accordingly? What right has the Council to force such a change upon us?

If your response is that our local businesses need such a relaxation in order to flourish then I would counter that these are not desirable local businesses to have in such a residential area as ours, and would be no loss to the Village if they closed down.

If anything, we need tighter regulations of these types of business, not looser. We already suffer from late night noise from the likes of Hemingways et al. Their clientele is not comprised of locals making use of a local amenity, but people from outside the area who have no regard for those living here. I make no excuses for having what could be seen as a NIMBY attitude towards this subject. There are areas of London where late night activity and noise is the norm, where the majority of the population is young and keen to participate in such activity - Wimbledon Village isn't one of them.

If you want to relax the licensing policy you should arrange to rent a flat in the High Street, or next door to Hemingways, and live there for a while so as to experience what you've inflicted on the Village.

Regards

[REDACTED]

From [REDACTED]

Sent: 03 September 2020 11:30

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: Councillor Andrew Howard <Andrew.Howard@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment”

Dear Sheila Brass

I am writing in response to the above consultation and, specifically the proposal to remove the CIZ status of Wimbledon village. I am a resident of the Village ward. I write to oppose the proposal to remove the CIZ status on the following grounds:

1. The Council's argument for the proposal appears to be that there no longer is a need for the CIZ to be retained because of the lack of notified incidents. This seems illogical on two counts. First, it suggests that the CIZ status has been effective. Second, the low number of reported incidents refers to crime rather than nuisance, which will impact residents but is unlikely to be reported.
2. The number of residential roads surrounding the village and the number of residences on the High Street and Church Road mean that there are many residents vulnerable to the noise and associated nuisance from alcohol related issues.
3. The number of licensed premises in Wimbledon Village is at least as high as when the CIZ was first implemented and therefore remains appropriate.
4. There appears to be an issue with alcohol related gatherings on the Common near Rushmere. Removing the CIZ will only accentuate the problem.

I accept that, as we come out of lockdown, the hospitality businesses need support but there needs to be a balance with the needs of local residents. The removal of the CIZ in Wimbledon Village is a step too far in this balancing act.

I shall therefore be grateful if you will retain the CIZ in Wimbledon Village and recognise its effectiveness.

Regards

[REDACTED]

From: [REDACTED]
Sent: 07 September 2020 15:08
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc:
Subject: Wimbledon Village CIZ

Dear Sirs

As a village ward resident , I wish to object to the proposal to cancel the CIZ relating to Wimbledon village

1 . The CIZ has worked well since introduced ; it is no longer a late night drinking arena with loud and antisocial behaviour, but any change in the status would immediately open the Village to a change of tide , and the danger of reverting to the position that previously appertained, and caused the introduction of the CIZ in the first place

2. The first point, above , is accentuated by the proposal to , correctly, retain the CIZ for the Wimbledon Town Centre; this is completely illogical , and would inevitably have the result of pushing antisocial elements “ up the hill “

3. Post covid first lockdown we are seeing a wholly different situation on Wimbledon Common , around “ Rushmere” , and just of the central Village ; large groups gather in the late evenings, no social distancing, cans and other debris left for the wardens to clear ; any lessening of restrictions will inevitably accentuate this trend , encourage the borderline criminal fraternity, and seriously affect the whole area

4. When covid ends, and Britain returns to normal, London want our tourists back : Wimbledon village is one of the six London villages , with attractive buildings, character shops, scenic pubs, and “go to” restaurants, and an atmosphere that we must do everything to encourage . It is a jewel in Merton’s crown to be massaged and cultivated, not treated , as present , with disproportionately highly priced and inconvenient parking restrictions, unsympathetic planning decisions, and no concern for the wider environment.

5. Any such proposal should be supported by an uptodate and specifically targeted survey of local residents; nothing of this kind has been taken ; yet the Council then seek to rely on an old and peripheral survey, not representing even a handful of affected Village ward residents

I urge the Council to make a fair and reasonable assessment of the position , and continue the CIZ for at least a further five years

Yours faithfully

[REDACTED]

-----Original Message-----

From [REDACTED]

Sent: 02 September 2020 16:50

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Cumulative Impact Assessment

We live in the Village Ward and object to Merton Licensing Authority removing the above CIA, simply to increase the sale of alcohol through extended licensing Underage Drinking on the Common will be a problem.

[REDACTED]

From: [REDACTED]
Sent: Monday, August 31, 2020 2:45:39 PM
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2012-26 and Cumulative Impact Assessment

Dear Ms.Brass

I am writing to object to the the proposed changes to the Licensing Policy in Wimbledon Village, which I believe could have adverse consequences for the Village if the special status as a "Cumulative Impact Zone" is withdrawn. This designation has served us well in protecting the amenities of residents when licensing applications have been considered, and in my view has enabled a fair balance to be achieved between the interests of the residential and business communities.

In my opinion this is a backward step, particularly with COVID-19 and the possibility of future coronavirus pandemics occurring. The council should be taking a responsible approach to limiting late opening hours. This not only applies to keeping the existing licensing hours in Wimbledon Village as they are, but the Council should reduce elsewhere to be in line. Many people in this country are concerned about health issues, be it coronavirus, alcoholism or violence in out streets late at night. There is a not only a cost to peoples health from late opening, neighbourhood noise and local violence but a financial cost to the police and public services at a time when they are already stretched.

The fact that there has not been crime and disorder incidents, alcohol-related ambulance call outs or complaints to environmental health issues etc highlights the success of the Council's Licensing Policy in Wimbledon Village and is a very good reason why the status-quo should be maintained and introduced to other areas of the Borough, particularly in family areas like Wimbledon Village.

I therefore feel that Merton Council should be taking a lead on social issues, particularly in light of the current pandemic to act responsibly in the interests of residents and importantly public services in keeping the current Licensing Policy in Wimbledon Village and bringing other areas in the Borough into line too.

Kind regards

[REDACTED]

From
Sent:

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021 - 2026 and Cumulative Impact Assessment

Dear Ms. Brass,

We are residents of the Village ward and fully agree with the Parkside Residents' Association objections to the cancellation of the CIZ protection in Wimbledon Village.

The PRA Committee's view is that the Council's proposal has not been thought through.

- J The lack of recorded data is not surprising. The CIZ in the Village was designated in response to antisocial behaviour and nuisance issues in the Village. Most of these incidents are not reported to the police/Council but they are nonetheless legitimate concerns for protection in a licensing policy. The 'prevention of Public Nuisance' is one of the objectives stated in the Licensing legislation.
- J Lack of recorded data is most likely to be a result of the effectiveness of the CIZ. There are a number of licensed premises in the Village and therefore the risk of late night noise, antisocial behaviour and nuisance will continue and it is more than likely will escalate if not controlled by the CIZ protection.
- J The withdrawal of the CIZ protection risks bringing unwanted change to the Village. There are a number of empty units in the High Street which are more likely to attract more restaurants than shops, if the CIZ protection is removed we could see more licences being granted and late night extensions for alcohol sales to enhance their income. We do not want to have a 'vibrant night time economy' in the Village if this bring with it late night alcohol related problems experienced in Wimbledon Town Centre.
- J This is an important change and should be supported by evidence from residents in the affected area. No survey has been undertaken. The Council is relying on responses to questions about general perceptions of safety gathered from a 2019 borough wide sample survey which included a very small number of residents in the Village Ward and made no reference to the proposed changes in the licensing policy.

We ask the Council to reconsider the proposal.

Yours sincerely,

From [REDACTED]

Sent: 03 August 2020 07:45

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

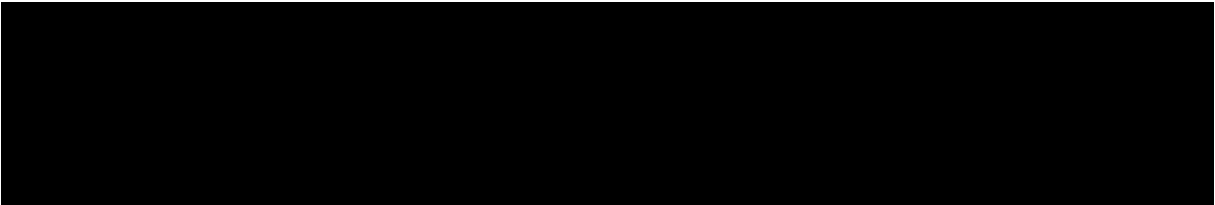
Hi Sheila,

Hope you are well.

I live at [REDACTED] in Wimbledon Village. I'm slightly concerned about the proposed changes to the licensing rules in our area and think it will adversely impact the local area.

A summary of my rationale is below:

- I believe the lack of recorded nuisances and antisocial behaviour issues in Wimbledon Village show's how the current process works highly effectively and it is a further argument for not changing the licensing policy.
- this will provide unwelcome change to the Village. I understand that a lot of the premises are empty but we should be trying to fill them with local shops not restaurants.
- The late night extension of alcohol sales will change the feel of the village. It could lead to noise and unwanted disturbances in the village at night.



From [REDACTED]

Sent: 05 September 2020 22:07

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 Wimbledon Village

Dear Ms Brass,

With regard to the consultation on the above, we are strongly of the opinion that the CIZ arrangements currently in place in Wimbledon Village should be retained.

We believe that it offers a fair balance between the interests of local business, the opportunities for visitors and the local community.

Recent problems associated with the unlimited use of the Common has resulted in local difficulties and increased costs to the local conservators. This would be further evidenced in the village in the event that the open times of facilities were extended, bearing in mind the CIZ in neighbouring areas.

With thanks.

[REDACTED]

From: [REDACTED]
Sent: 07 September 2020 13:36
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Wimbledon Village Farmers Market - Amazing

Hi Sheila,

I hope you had a great weekend. I just wanted to write to you and say what a great job has been done with the new location for the Farmers Market in Wimbledon Village.

As lovely as the old market was, being able to spread out into the street gave the market, the stalls and importantly the village a whole new energy, one that hopefully will continue as we see a resurgence in visitors to our amazing little community following the pandemic – we definitely need it!

I understand from some of my friends that there is a proposal to extend the licencing laws too – something I whole heartedly back. We need to drive more people back to the village, move with the times and embrace a little change, while continuing to offer an authentic experience people want to come back too. It can only benefit every other outlet in the village in my opinion, in a time when we all need to stand together.

Thank you for your hard work, it certainly had an impact on me and will hopefully continue to drive positive change in the village.

Kind Regards

[REDACTED]

From: [REDACTED]

Sent: 02 September 2020 19:18

To: Sheila Brass Sheila.Brass@merton.gov.ukpos

Subject: Consultation, Licensing Policy 2021 - 2026, Retention of CIZ in Wimbledon Village

Dear Ms. Brass,

It has been brought to my attention that there is a proposal for businesses in Wimbledon Village to be dropped from the CIZ classification. As a long-standing resident of the village, having moved into my present house ([REDACTED] in 1966) I strongly object to such a move. The reason that there has been a relatively small amount of crime in this area is precisely because the CIZ classification has been in force so why abandon a successful system?

Having lived in Wimbledon village for over 50 years now I note with some dismay the increase in population, in buildings where there is no parking provided, in the volume of traffic. Surely it is high time to enforce protection of the establishments where alcohol is provided rather than throw it to the wind. Since Covid we have seen increasing numbers gathering on Wimbledon Common round the Rushmere pond, leaving quantities of litter. Now that pubs and restaurants are beginning to open up it is to be hoped that those gathering on the Common and bringing their own drinks will move to these establishments. Wimbledon village is a popular area, especially at the weekend. I should feel reassured if the CIZ classification were retained in order to protect us from potential hooligans.

I would add that not every petty crime or noisy behaviour is brought to the attention of the police. Plenty of minor crimes and disturbances occur without the involvement of the authorities. That does not make them any less of a nuisance to the many elderly, like myself, who live in this hitherto quiet, leafy suburb.

I have been the object of a minor theft when my handbag was stolen from my house some years ago. It was later discovered empty in an adjoining garden and was clearly the result of someone from the local pub, the Swan in the Ridgway, having gone in search of cash. This is the sort of crime we would like to feel we are protected from.

So please, please retain the CIZ in Wimbledon Village.

Yours,

[REDACTED]

From:

Sent: 07 September 2020 13:01

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Re: Consultation on Village Ward's CIZ.

Dear Ms. Brass,

As a resident of the Village Ward, I ask you to please note my objection to the proposal to end the inclusion of the ward in the CIZ.

It ain't broke, so *please* - don't fix it.

Yours sincerely,

A solid black rectangular box used to redact the sender's name and signature.

From [REDACTED]

Sent: Wednesday, August 19, 2020 10:58:39 AM

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

Dear Ms Brass,

I have lived in the Village for 37 years.

I also spent my school years here.

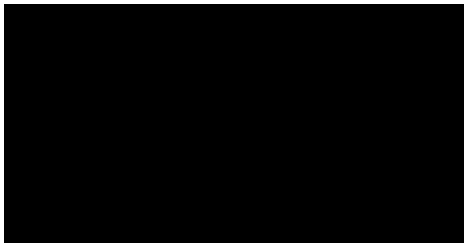
Over that time, the nature of the Village has changed substantially. What has been particularly noticeable is that the number of quick-service restaurants has multiplied enormously. These facilities appear to be just one stop on rounds of drinking that young people now frequent. These are not restaurants where patrons spend an evening dining (and drinking) and then return home.

Particularly on Fridays and Saturdays, there seem to be fairly continuous pub-crawls.

It is perhaps not surprising that the Council does not feel there is a problem with anti-social behaviour and crime. Residents have given up reporting vandalism, car break-ins and anti-social behaviour resulting from the influx of drinkers, as the police seem to be more concerned with appearing "cool" and "woke" than tackling problems. Rest assured, anti-social behaviour and crime are still prevalent.

So, I think the relative calm achieved by the current arrangements should be maintained

Best regards,



From: [REDACTED]
Sent: 04 September 2020 18:50
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc: [REDACTED]
Subject: PROPOSAL TO CANCEL THE CIZ (CUMULATIVE IMPACT ZONE) STATUS OF THE VILLAGE REGARDING LICENSING

Dear Sheila Brass

We feel that the proposed removal of the designation of Wimbledon Village as a Cumulative Impact Zone regarding Licensing, should not go ahead for the following reasons:

The residential hinterland of the Village is currently protected by the CIZ from excessive nuisance, crime and disorder. This should continue. To remove its protection will, over time lead to more crime, nuisance and disturbance as more premises will inevitably be granted licences. To say that there are insufficient cases of crime, nuisance and disturbance to justify its retention seems illogical - surely that is the reason for its retention so that these cases of crime, nuisance and disturbance are kept in check otherwise they will gradually increase as more licences are granted.

Merton Council on the one hand want to protect borough residents from nuisance and disturbance from non-residents by for example Low Traffic Neighbourhoods and then on the other hand it wants to reduce protection for residents by withdrawing for example the CIZ. This doesn't make sense.

Kind regards

[REDACTED]

From [REDACTED]

Sent: 07 September 2020 18:21

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Re: Licensing Policy - An Important Consultation on Changes

Hi Sheila,

I have just seen [REDACTED] email below and wanted to echo his thoughts on the subject matter. It's so important locals speak up in support of you at this time.

As a proud female business owner I understand it's vitally important we stick together and encourage investment into the area. Ideally from independent entrepreneurs but investment non the less during these unprecedented times. Wimbledon Village, as along with all high streets in the UK, has been going through change. Modern technology has been chipping away at the historical shopping habits of consumers over the last few years and it is changing the very fabric of the way we use our local amenities.

The service industry plays a significant role in changing the future of the High Street, it has to evolve and restaurants, pubs and bars alike should be encouraged. Locals will visit a thriving high street especially if there is a variety of different options during their leisure time. We need to act quickly and encourage new and fresh investment into the area before it is too late. We also need put a stop to greedy landlords charging rental prices that price out independent entrepreneurs but perhaps that challenge comes at later stage.

I have lived here for over 10 years and during this time this has been a safe environment for women to live and work. I do get frustrated when I hear people exaggerating the noise, the increases in traffic and the minor disturbances which are common place in any suburb of any village or town anywhere in the world. It's a nonsense to say Wimbledon isn't safe. It's time we opened up the village up to new ideas, new ventures, we want positive change. We want new people to visit and even live here.

I fully support the proposal to extend licencing laws and would actively spend my money in the Village to support it through these challenging time. I wish you well with your endeavours.

Regards

[REDACTED]

----- Forwarded message -----

From: [REDACTED]

Date: Mon, 7 Sep 2020, 10:23

Subject: Licensing Policy - An Important Consultation on Changes

To: <sheila.brass@merton.gov.uk>

Good morning Sheila,

Yesterday we attended the newly located Sunday's farmers market on the Wimbledon Village High Street and I was delighted to see high levels of footfall and bustling activity on a sunny autumnal day. It made for such a positive experience and I was encouraged for local shops, bars and restaurants thriving and villagers clearly enjoying themselves and spending money.

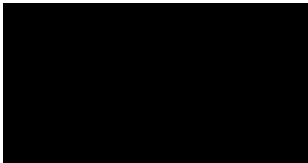
With Covid, and the challenges that obviously presents, it's upsetting to see so many shops struggling and even closing down. I have lived here for over 20 years and have never seen so many empty shops in Wimbledon Village. It's worrying. Yesterday I was with a large group of friends, all professionals in their relative fields (some travelling here on a sunny day) all commenting on the need to spend locally to invest in the greater good of their local community.

I see your proposal to extend licencing laws and commend you. It's exactly what we need. We need footfall, we need newcomers visiting our High Street and enjoying it. We need to make it attractive again to visit. The village is such a wonderful place, and whilst we need to respect it's heritage, we need to embrace the future. An increase in F&B outlets will move the village forwards and help the local community. In my opinion, it's also wrong that that a large pub company has been allowed to monopolise an entire area and is able to exploit the locals through an inflated pricing strategy, discouraging local spend no doubt. Lifting over cautious restrictions will encourage competition, improve standards and increase the chances of people visiting our high street. It will help us to save our High Street and protect the local community.

Thank you for you hard work and commitment to improving Wimbledon Village. We need to change and adapt to the times we are in and I am delighted you are helping us.

I wish you well, don't give up!

Best regards,



From [REDACTED]

Sent: 18 Aug

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

Merton Council – Licensing Policy Review Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

We understand that the Council is reviewing its Licensing Policy and one specific cause for concern is the cancellation of the special status which Wimbledon Village has enjoyed since 2005 as a “Cumulative Impact Zone” (CIZ).

As we understand it a CIZ in a Licensing Policy means the amenities of residents are given priority and that applicants for new licences and/or late night extensions to permitted hours to sell alcohol have to justify their proposals as a special case.

The overall number of licensed premises in Wimbledon Village has changed little since 2005 and it has enabled our and other residents’ associations to ensure that late night opening is controlled to minimise any disturbance, nuisance and undue noise for residents. Some applications for new licences have been refused. Others, for late night extensions during the week, have been withdrawn in negotiation or refused at Hearings. Friday or Saturday night extensions have usually been limited to midnight and linked to service of meals. A consensus has been established which has achieved a fair balance between the interests of the business and residential communities. Put simply, the CIZ has worked and this protection has been important to the Village.

The Council's main case for cancelling the Village CIZ is that there is insufficient evidence of crime and disorder incidents, alcohol-related ambulance call outs or complaints to environmental health services etc. to justify continuing the CIZ protection. The most obvious reason for this lack of recorded incident data is unsurprising as it reflects the effectiveness of the CIZ.

The Village CIZ was designated in response to nuisance and antisocial behaviour issues. By their nature, many of these issues are not reported to the police or the Council but they are still legitimate concerns for protection in a licensing policy. (The “Prevention of Public Nuisance” is one of the stated Objectives in Licensing legislation.)

Withdrawing CIZ protection risks bringing unwelcome change to the Village. Without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. The Village is not suitable for a “vibrant night-time economy” as Wimbledon Town Centre’s is described. It is disturbing to note that, by contrast, the Council is proposing that Wimbledon Town Centre’s CIZ, established at the same time as the Village CIZ, should be retained

As the new Policy will operate for the next five years it is right that we should look ahead, basing our views on what we would like for the Village in an environment where we can enjoy the best it has to offer.

The Covid19 situation has obviously changed everyone’s perception and the hospitality industry is having to re-open in a new era of social distancing. Therefore, we feel the proposed changes in licensing policy should be supported by survey evidence from all residents in the affected area. It is incorrect for the Council, especially now in the light of Covid19, to rely on information gathered from responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents.

Yours sincerely,

From [REDACTED]

Sent: 07 September 2020 16:13

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: FW: Licensing Policy - An Important Consultation on Changes CIZ 2021 - 2026

Dear Ms Brass

I am responding to the email below which I received from [REDACTED]

I am appalled that the Council are considering amending the licence in relation to Wimbledon Village. I agree with every word Clive has set out below.

The existing policy has worked well. It is utterly ludicrous to suggest that because it has worked well we no longer need it. We might have had a foretaste through the lock-down period of what might happen if the licence were to be removed.

I live in [REDACTED] just off the Common and we have been subjected to nightly disturbance and noise from, mainly youngsters buying alcohol and then "partying" into the late hours on the Common close to the Village. The next day the locals are asked to volunteer to clear up the disgusting litter they leave, locals who I would point out have already paid for the upkeep of the Common.

Due to the vast numbers of non-locals massing on the Common during lock-down I and many of my neighbours were simply unable to use the Common. Quite disgraceful.

Yours sincerely

From [REDACTED]

Sent: [REDACTED]

To: [REDACTED]

Subject: Fw: Licensing Policy - An Important Consultation on Changes

Sent from my BlackBerry — the most secure mobile device — via the EE Network

From: [REDACTED]

Sent: 1 September 2020 19:56

To: [REDACTED]

[REDACTED] - An Important Consultation on Changes

An Important Consultation on Changes to Licensing Policy

Dear Residents,

The Council is reviewing its Licensing Policy and consulting on proposed changes. One proposal is to cancel the special status which the Village has enjoyed since 2005 (when Merton's Licensing Policy was first introduced) as a "Cumulative Impact Zone" (CIZ), whilst retaining Wimbledon Town Centre's CIZ which was established at the same time.

What is a CIZ? Areas with a high concentration of licensed premises which collectively attract large numbers of visitors are at greater risk from the alcohol related problems (ranging from crime to nuisance and antisocial behaviour) which Licensing laws seek to control. So when such an area is designated as a CIZ in a Licensing Policy the amenities of residents are given priority; applicants for new licences and/or late night extensions to permitted hours to sell alcohol have to justify their proposals as a special case.

How has the CIZ worked for Wimbledon Village? The Village CIZ designation was made because of the incidence of nuisance, noise, disturbance and antisocial behaviour experienced by residents. Since then, CIZ protection has been important; the overall number of licensed premises has changed little and when challenging licensing applications, residents' associations have been able to ensure that late night opening is controlled to minimise nuisance etc. Some applications for new licences have been refused. Others, for late night extensions during the week, have been withdrawn in negotiation or refused at Hearings and Friday or Saturday night extensions have usually been limited to midnight and linked to service of meals. A consensus has been established which has achieved a fair balance between the interests of the business and residential communities. Put simply, the CIZ has worked.

Why is it proposed to cancel the Village CIZ? The Council's main case for the cancellation is that there is now insufficient evidence of incidents of crime and disorder, alcohol-related ambulance call outs or complaints about noise and disturbance to environmental health services etc. to justify continuing the CIZ protection.

Village area Residents' Associations believe that the proposal to cancel the Wimbledon Village CIZ designation is not justified. These are the main reasons:

- J The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.
- J The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case

in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.

) The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.

) Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.

) An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

) Residents living in and around the Village have spoken of their concerns about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

As we emerge from lockdown with the hospitality industry having to re-open in a new era of social distancing, some of the issues which this consultation is addressing may seem rather remote. However, the timing of this review is unavoidable and as the new Policy will operate for the next five years it is right that we should look ahead, basing our views on what we would like for the Village in an environment where we can enjoy the best it has to offer.

If the Council is to reconsider this proposal it will want to hear from as many Village area residents as possible. If you agree with the objections summarised above, and/or have your own thoughts to add, you can send your comments in an email to the Licensing Officer, Sheila Brass sheila.brass@merton.gov.uk quoting "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment" and confirming that you live in the Village Ward. Alternatively you can complete the Council's online questionnaire headed "Review of Cumulative Impact Zones 2021" (which also refers to the proposed retention of the CIZ in Wimbledon Town Centre and another in Mitcham) via this link:

<https://consult.merton.gov.uk/kms/dmart.aspx?LoggingIn=tempVar&strTab=PublicDMart&noip=1>

The consultation ends on 7 September 2020

From: [REDACTED]
Sent: 07 September 2020 11:55
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Re: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear members of Merton Council Licensing Committee,

I have been a resident of Wimbledon Village Ward for 28 years, and I am [REDACTED] Wimbledon Village Ward Safer Neighbourhood Police Panel. It is in both capacities I write to oppose the proposed removal of the Cumulative Impact Zone (CIZ) which was granted to the Village in 2006 in response to a large amount of nuisance, noise and antisocial behaviour.

The CIZ has been effective for the Village, and nuisance calls and antisocial behaviour appear to have decreased. Surely this means the CIZ is working, and should not be justification for its removal.

Our local Safer Neighbourhood police team have worked closely over the years with licensed premises to actively discourage the sales of liquor to underage children, and have had success in doing so. They also work hard making sure that the Village is a safe place for residents and visitors alike. Having more licensed premises will make their job more difficult, and residents' lives more inconvenienced.

Despite the hard work of our police and the Wimbledon Common Rangers, Rushmere Pond remains a place where people congregate and drink in evenings, often resulting in crime and antisocial behaviour, not to mention trash which is generated and left behind. On an evening this past June, numerous police response cars and ambulances had to intervene, and although the sheer number of response vehicles was higher than usual, it was not an unusual occurrence. Removing the CIZ would only increase drinking in the Village and contribute to more issues on the Common.

There are empty units in Wimbledon Village. It would be a shame if those spaces were filled by restaurants and bars, rather than shops which would be useful for residents.

A decision this impactful should not be undertaken without consulting the residents who will be affected by it. It is my understanding the Council is relying on a borough wide survey which few Village residents responded to, and made no reference to changes in Licensing policy.

Without CIZ protection, the nature of the Village could be materially changed, to the detriment of the residents, businesses and police. Please keep it in place.

Yours truly,

[REDACTED]

Wimbledon Village Ward Safer Neighbourhood Police Panel

From [REDACTED]

Sent: 30 July 2020 17:02

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila,

I am writing to support the Parkside Residents Association (PRA) objections to the cancellation of the Wimbledon Village CIZ protection.

In addition to the points made by the PRA committee, I would like to add that:

-) Any extension of licensing the Village would 100% lead to more anti-social behaviour. To counter this, the police would have to guarantee an increased number of resources to the Village, which given resource restraints, is unlikely to happen. The police have struggled to handle the increase of anti-social behaviour during these sunny-noschool-furloughed days, yet alone with an extended licening period. This is not to criticise the police, but a realistic comment on the police's limited resources.
-) The Village is called the Village, because of its unique Village characteristics. Extended licensing is totally contrary to a Village feel which is not about a "vibrant nightlife".
-) A decision needs to be made on facts and data, which must be drawn from Village residents, rather than the wider borough, which has different characteristics.

Please reconsider the current proposal which would have a very detrimental impact on the Village, which plays an important role in positioning the borough as a positive and attractive place for residents, businesses and visitors.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 03 September 2020 23:48
To:
Cc: [REDACTED]
Subject: Proposals to lift the CIZ for Wimbledon Village

Dear Sheila,

I am writing to strongly object to the proposal to lift the CIZ in Wimbledon village. As both a resident and a former Chairman of the Councils Licensing Committee I am well apprised of the need to retain CIZ, both for the benefit of village residents and to retain the character of this well loved part of the borough.

The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.

The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was specifically designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.

- Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.

- An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

- Residents living in and around the Village have spoken to me of their concerns about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is absolutely not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

Yours faithfully

From [REDACTED]

Sent: 25 August 2020 11:47

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultations; Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass

We live in [REDACTED], close to Wimbledon Village, and are frequent users of the amenities that the Village has to offer as well as the Commons nearby.

We are strongly opposed to the removal of the Village CIZ from the Licensing Policy which is due to take effect in 2021. The analysis in the CIA refers to data from the police and ambulance services regarding the low level of call outs to the Village but this, surely, is evidence of the effectiveness of the Village's CIZ status not a reason to remove it.

In fact there has been a considerable increase in late night disturbance, more recently, thanks to the Covid 19 lock downs and consequent heavy use of the Commons areas nearest to the Village for late night partying. The availability of alcohol into the night would only exacerbate this problem.

If the CIZ for the Village is removed, and that for the Town retained, it would, in effect, promote the Village as a late night drinking destination. This would be a wholly undesirable label to put on one commercial street in the heart of a residential community and the consequences for the families living here would be wholly unacceptable.

Yours sincerely

[REDACTED]

From: [REDACTED]

Sent: 02 September 2020 08:50

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: proposal to remove the current CIZ for Wimbledon Village

Dear Sheila,

We are writing to express our strong objection to removing the current CIZ for Wimbledon Village.
Being residents of the Village for many years we find no valid reason for the proposed change.

Sincerely yours,

[REDACTED]

From: [REDACTED]
Sent: 06 August 2020 12:44
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc: [REDACTED]
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms. Brass

I wish to comment on and object to the above proposals in so far as they impact Wimbledon Village.

My wife and I fully support the position of the Parkside Residents' Association and I am copying my e-mail to them.

CIZ protection has been important to the Village. The overall number of licensed premises has changed little since 2005 and it has ensured that late night opening is controlled to minimise undue noise, disturbance and nuisance for residents such as us. Some applications for new licences have been refused. Others, for late night extensions during the week, have been withdrawn in negotiation or refused at Hearings and Friday or Saturday night extensions have usually been limited to midnight and linked to service of meals. A consensus has been established which has achieved a fair balance between the interests of the business and residential communities. Put simply, the CIZ has worked and for us reduced significantly the late night crime, disturbances and litter thrown into our garden.

The Council's main case for cancelling the Village CIZ is that there is insufficient evidence of crime and disorder incidents, alcohol-related ambulance call outs or complaints to environmental health services etc. to justify continuing the CIZ protection (note. this seems to ignore the recent drunk fuelled raves around Rushmere Pond on Wimbledon Common – see below).

In our view the Council's proposal is ill-conceived:

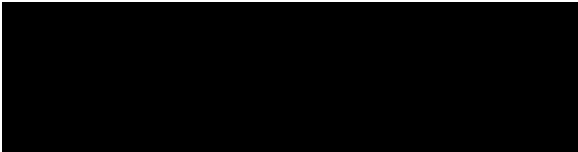
-) The lack of recorded incident data is unsurprising; the Village CIZ was designated in response to nuisance and antisocial behaviour issues, many of which, by their nature, are not reported to the police or the Council but they are still legitimate concerns for protection in a licensing policy. (The "Prevention of Public Nuisance" is one of the stated Objectives in Licensing legislation.)
-) In any event, lack of recorded data is more likely to be a reflection of the effectiveness of the CIZ. Given the numbers of licensed premises in the Village, the risks of late night noise, nuisance and antisocial behaviour will continue and may escalate unless properly controlled by CIZ protection.
-) Withdrawing CIZ protection risks bringing unwelcome change to the Village. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. Do we want the Village to have a "vibrant night time economy" - which is how Wimbledon Town Centre's late night alcohol related problems are frequently, if somewhat euphemistically, described?
-) An important change of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in licensing policy.

In addition the proposal does not seem to take into account in any way the significant increase in COVID -19 risks that removing the CIZ in Wimbledon Village would bring. It is already clear that COVID-19 will be with us for many years to come even if a vaccine is feasible next year. Increasing

the number of licensed premises can only increase the risk of a breakdown in social distancing and a local pandemic outbreak. The Council will certainly be aware of the drunken, drug fuelled and violent raves that have already taken place around Rushmere Pond on Wimbledon Common in close proximity to Wimbledon Village that have consumed valuable emergency services resources -police and ambulance – and have led to injuries and at least one death. We believe that before going ahead with these proposals the Council is under an obligation (possibly a legal one) to undertake a COVID-19 risk assessment and publish it.

We therefore strongly oppose the lifting of the CIZ for Wimbledon Village.

Sincerely



From: [REDACTED]

Sent: 03 September 2020 11:10

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2012 - 26 and Cumulative Impact Assessment

Dear Sheila Brass,

As a resident of Wimbledon Village Ward, I consider removal of CIZ status potentially harmful to the character of this neighbourhood.

Furthermore, should CIZ status in the Town Centre be retained, the results are obvious: drinkers migrate to Wimbledon Village where they spill easily onto the Common.

This can lead to rowdy behaviour, drug taking, discarded litter, which has to be cleared by the Council & possible Police involvement.

All this could follow from one misconceived decision by the Council to remove CIZ status from Wimbledon Village.

It is hard to see the merits of any such proposal.

[REDACTED]

From [REDACTED]

Sent: 03 September 2020 11:57

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass

“Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment”

I am writing to strongly support the objections you have received from the various Wimbledon Village and surrounding Residents' Associations and Residents themselves, to the cancellation of the Wimbledon Village CIZ protection.

-) Should the CIZ in the Village be cancelled, there is no doubt this would lead to far more anti-social behaviour.
-) Police resources are already under huge pressure and given the current restraints on their resources, it is unlikely there would be capacity to counter this.
-) We have already witnessed the huge problems arising from 'parties' on Wimbledon Common during the current Covid crisis and sadly the police have struggled to contain these due to being so under-resourced. The police are doing a fantastic job but sadly, their hands are tied due to lack of finance etc.
-) The Village is called The Village due to its unique features. The Village is not a place for exciting nightlife and entertainment and this is why the Village has such a special feel. This is also why the Village attracts so many residents, businesses and visitors.
-) The decision must be based on the feedback from the residents of the Village and surrounding area. This cannot be taken from facts and figures from Merton Borough as a whole which has quite different areas, with completely different characteristics.
-) The Council's reasoning that the Village's anti-social behaviour is under control, hence the abandonment of the scheme does not make sense. The reason the anti-social behaviour is under control is precisely because of the implementation of the CIZ.
-) Prior to the implementation of the CIZ the anti-social behaviour was far worse, hence the Village's 2005 inclusion in the scheme – it speaks for itself!

Please reconsider the current proposal which would have an extremely detrimental impact on the Village – please safeguard its unique atmosphere and the well-being of the residents and those who visit it.

Thank you.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: Wednesday, August 19, 2020 6:38:48 PM
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, licensing policy 2021-2026 and cumulative impact

The PRA committee's view is that the Council's proposal is ill-conceived:

-) The lack of recorded incident data is unsurprising; the Village CIZ was designated in response to nuisance and antisocial behaviour issues, many of which, by their nature, are not reported to the police or the Council but they are still legitimate concerns for protection in a licensing policy. (The "Prevention of Public Nuisance" is one of the stated Objectives in Licensing legislation.)
-) In any event, lack of recorded data is more likely to be a reflection of the effectiveness of the CIZ. Given the numbers of licensed premises in the Village, the risks of late night noise, nuisance and antisocial behaviour will continue and may escalate unless properly controlled by CIZ protection.
-) Withdrawing CIZ protection risks bringing unwelcome change to the Village. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. Do we want the Village to have a "vibrant night time economy" - which is how Wimbledon Town Centre's late night alcohol related problems are frequently, if somewhat euphemistically, described?
-) An important change of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in licensing policy.

I look forward to you reconsidering the current proposal.

[REDACTED]

-----Original Message-----

From: [REDACTED]
Sent: 28 July 2020 17:08
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Cumulative Impact Zone - Wimbledon Village

Dear Sheila,

We are residents in the Village Ward.

I am writing to you to ask you to reconsider removing the Cumulative Impact Zone from Wimbledon Village.

Since it's inception in the area the locality has improved notably in the evenings and weekends.

I am unaware of the statistics but as a resident I view the area as much improved.

It would be regrettable if this improvement were to be lost.

Kind regards



Sent from my iPad

-----Original Message-----

From: [REDACTED]

Sent: 04 September 2020 13:11

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila,

We believe the proposal to cancel the Wimbledon Village CIZ designation would not be in the interests of local residents or the long term success of Wimbledon village as a whole.

The CIZ has been successful in reducing the amount of crime and alcohol related incidents in the village and we would very much like it to continue.

It has been noticeable that the late night noise level in the area opposite our house around Rushmere Pond has increased and we are deeply concerned that this and the associated littering would markedly increased if the CIZ was removed.

Best regards,

[REDACTED]

From: [REDACTED]
Sent: 27 July 2020 17:13
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila,

I am a resident in the Wimbledon Village ward, resident at [REDACTED]
[REDACTED].

I have learnt through my membership of the Parkside Residents Association of the above consultation. I would just like to register my concern at the possible cancellation of the Village's status as a CIZ. Before this was the case the level of late night noise was noticeably higher (living where we do we are on the route home for many pedestrian drinkers coming from the areas further up Parkside towards Tibbetts Corner); since the Village has been a CIZ this has been much reduced. With the number of licensed premises in the Village the risk of anti-social behaviour would be greatly increased by extension of licensing hours and I strongly support the views of the Parkside Residents Association on this issue. As always it is a question of balance when licensed premises are close to otherwise quiet residential neighbourhoods and I would support the maintenance of the Village with its special character as a CIZ, even more so should at the same time the CIZ status of Wimbledon Town Centre be retained (which would just drive all the drinkers up the hill and into the Village!).

I hope these observations are helpful.

Kind regards

[REDACTED]

From:

Sent: 07 September 2020 10:02

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

Dear Ms Brass

We live in the Village Ward [REDACTED] and are responding to the ongoing Consultation on Changes to Licensing Policy. In essence, we strongly believe the "Cumulative Impact Zone ("CIZ") for Wimbledon Village should be retained. In particular:

-) The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.
-) The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.
-) The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature, tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.
-) Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.
-) An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.
-) Residents living in and around the Village have spoken of their concerns about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

Kind regards,

[REDACTED]

From: [REDACTED]
Sent: 02 September 2020 16:09
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment”

Dear Sheila Brass

Thank you for the chance to comment on the proposal to end the CIZ for Wimbledon Village.

I feel that this would be a mistake and I offer three reasons.

I understand that the justification for the change is at least in part because the earlier imposition of the CIZ resulted in a reduction of associated problems, and that therefore it is no longer needed. That seems to me a strange form of logic. If there was a problem and the CIZ removed it, then that is in itself a powerful reason to retain the CIZ to ensure that the problem does not return, not to remove it.

I understand that it is not proposed that CIZ status be removed from Wimbledon Town. That is a recipe for the transfer of the problem up the hill, is it not?

Finally, with the current atmosphere of uncertainty resulting from Covid, which has as you will be aware led to unwelcome drinking on parts of the Common near the Village, this is surely not the time to ease control of alcohol consumption, probably anywhere, and certainly not in or around Wimbledon Village.

In summary, this is not a good idea and one which I believe does not reflect the wishes of the affected population, surely the prime consideration.

Sincerely

[REDACTED]

From: [REDACTED]
Sent: 28 July 2020 09:03
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

I am a resident of Wimbledon Village and I live within earshot of the Village high street in [REDACTED]. I am writing to strongly object to the proposal to stop Wimbledon Village being a cumulative impact area.

The cumulative impact zone (CIZ) is essential to protect Wimbledon Village from becoming a late night drinking/eating destination. Whilst it is essential for any high street to have a vibrant bar and restaurant scene, if licensing of late night venues is allowed, the incidence of noise, crime and nuisance will increase and safety will be compromised. I have no doubt that these matters have been kept under control to date because of the CIZ being in place. I also believe that if the CIZ is removed, more bars and restaurants will be attracted to the area, forcing out other shops (which will upset the balance of the types of proprietors on the high street) and making the village a destination for late night revellers.

I hope that this e mail helps to persuade you of the ridiculousness of the suggestion to remove the CIZ. Currently the Village feels a safe place to be at night and removal of the CIZ allowing late night drinking will obviously jeopardise safety, increase noise levels, crime and anti-social behaviour, and generally ruin the atmosphere of the Village. The Village is in the middle of a residential area and the late night noise levels which will necessarily increase with the removal of the CIZ will severely disturb many quiet roads (including mine) on a nightly basis.

Yours sincerely,

[REDACTED]

From: [REDACTED]
Sent: 03 September 2020 10:51
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc: [REDACTED]
Subject: Consultation, Licensing policy 2021-2026 and Cumulative Impact Assessment

For the attention of Sheila Brass, Licensing Officer, Merton Council

3 September 2020

Dear Ms Brass

We are writing to object to the Council's proposed cancellation of the Cumulative Impact Zone (CIZ) in Wimbledon Village and to ask that the Council keep the Village CIZ.

We are [REDACTED]
[REDACTED] runs parallel to the High Street. Our house is [REDACTED] but within earshot of the High Street, which in happier times, pre-Covid 19, was a thriving commercial area with a fair share of cafes, restaurants and pubs.

It was also a civilised entertainment area largely because the CIZ ensured that premises supplying alcohol and/or playing loud music did not operate into the early hours of the morning. Thanks to the CIZ, a balance was achieved pre-Covid between the commercial interests of the High Street and the interests of residents who need to sleep at night.

We have read the Council's Cumulative Impact Analysis and it now appears that the Council is proposing to scrap a measure that has worked well for the Village on the flimsiest of evidence in times of great uncertainty.

The document makes no case for there being any demand to end the CIZ. Instead, the Council relies on favourable incident statistics and vague assertions of residents' level of contentment with life in Wimbledon Village to justify a change of policy that has worked well for 15 years. It takes no account of the fact that residents need to sleep well at night.

We have lived in this house long enough to remember conditions in the 2005-6 period, before the CIZ began to work effectively and when there was a proliferation of bars and other establishments in the Village operating to around midnight. If you search your files you will find that [REDACTED] wrote to the Council's licensing department on January 15th 2006 to report as follows: "Since the beginning of the year, one or the other of us has been woken on successive Saturday mornings between 00.30 and 01.00 AM by loud voices, the clattering of high heels, and the banging of car doors as the clients of some of Wimbledon Village's many licensed premises have come along [REDACTED] to find their transport home."

This is what we can expect if the CIZ is scrapped. We realise that the Council is obliged by the terms of the Licensing Act 2003 to review its licensing policy at this time. With many

Village retail outlets and cafes now closed as a result of the pandemic, we can understand why the Council might want to encourage the hospitality industry to take up vacant premises so as to boost employment and business rate income.

But the midst of a pandemic is surely the worst possible time to contemplate a radical change in the conditions created by the CIZ which have hitherto proved beneficial for residents -- who are also council tax payers.

Please remember that you are setting policy for a five year period to 2026. Although the hospitality trade is in a terrible state at present, we cannot assume that these conditions will last for ever. A Covid vaccine or other public health intervention may restore conditions in which running a bar late at night will again be a very profitable enterprise. And in those conditions, the Village would again emerge as catnip for people in the sector anxious to recoup revenues and profits lost during the crisis by seeking late night licenses.

You may think this vision far-fetched. But back in 2005, the Village was threatened with widespread "alcoholisation" as businesses vied to apply for licenses to sell alcohol and provide entertainment into the early hours of the morning.

Again, if you look into your files, you will find that on the 25th August 2005, ■ wrote to the Council's licensing department to protest about a specific application to extend alcohol consumption into the early hours of the morning. ■ letter contained the following paragraphs which should give you an idea of what could happen if the CIZ is abolished and the Covid-19 crisis eases. Referring to individual establishments, ■ wrote:

"A walk along the High Street in the Village reveals the following applications:

- i) SW19 – Alcohol and entertainment until midnight during the week and 1AM at weekends.
- ii) The Common Room. Alcohol and entertainment until 2AM.
- iii) The Dog and Fox, including Bayee Village and Finches. Alcohol, live music and dancing until midnight Sunday to Wednesday, until 1AM Thursday to Saturday, and until 2 AM on around 30 days a year.
- iv) The Rose and Crown. Alcohol and entertainment until midnight Sunday to Thursday, 1AM Friday and Saturday and 2AM on more than 40 days a year.
- v) The Brewery Tap. Alcohol until midnight Sunday to Thursday and 1AM Friday and Saturday."

Fortunately, the Council at that time listened to our plea and those of other Village residents and introduced the CIZ. Please do not undo that good work by scrapping the CIZ today. It is a policy that has worked and which should be retained.

We will copy this email to the Village Ward councillors.

Yours sincerely

From: [REDACTED]

Sent: 02 September 2020 15:23

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

Dear Sheila Brass,

With reference to the above consultation on changing the Licensing Policy 2021-2026, I would like to mention that this would have a devastating effect on the area around The Village. Only recently we had a group of very drunk noisy men shouting down along The Ridgway from The Village, bashing things insight and dismantling the big public bins and throwing them into the roads and pavements. If the policy was changed can you imagine what chaos would occur. Very frightening for anybody travelling home late at night and disturbing much needed sleep too.

Regards,

[REDACTED]

From: [REDACTED]

Sent: 06 September 2020 19:59

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

[REDACTED]

Dear Sheila

I wanted to say that I agree with all the points made by my local residents association (BERA) with respect to the proposal to remove the CIZ designation for Wimbledon Village. These are listed below. We live near the village (19 years) and I can vouch for the positive effect of introducing the CIZ designation in 2006, and the fact that despite this we still get incidents of public nuisance. The consequences of removing it for local residents would be detrimental, and only benefit the profits of pubs and other bars. Please protect your local residents who are at the core of maintaining a clean and safe and civil neighbourhood.

Best regards

[REDACTED]

1. CIZ designation for Wimbledon Village since 2006 has had a beneficial effect in preventing an increase in the number of licensed premises in the Zone and in ensuring that residents' concerns about controlling nuisance etc. are properly addressed in licensing applications. (Most applicants apply speculatively at first for late night opening every night). Removal of the designation will reverse these benefits and will have a long lasting and detrimental impact upon the character of the Village (eg Open Season on new applications for late night opening, new premises opening etc, etc.)

2. The Cumulative Impact Assessment upon which the recommendation is based relies heavily upon an analysis of data relating to Crime and Disorder incidents. These are not relevant to the Wimbledon Village CIZ which was designated in response to incidents of Public Nuisance. The Prevention of Crime and Disorder and the Prevention of Public Nuisance are separate but distinct Licensing Objectives which are of equal value when considering a CIZ designation. They have not been given equal weight in the Assessment.

3. The survey evidence cited in the assessment reporting residents' views on perception of crime, personal safety and other considerations was from a 2019 sample survey across the Borough. It gives neither a representative view in the Village Ward (the sample was too small) nor is it relevant in the context of Village CIZ licensing matters as respondents weren't asked about licensing related issues including their experience of nuisance incidents.

4. By their nature, incidents of Public Nuisance (such as noise and antisocial behaviour) tend not to be reported by residents nor require intervention by the police or other authorities so the absence of incident data should not justify an assumption that there have been no nuisance issues. Residents living in and around the Village say that they do experience ongoing nuisance issues (eg late night noise and disturbance, littering, parking problems and some antisocial behaviour) even if they have not reported them to the authorities.

-----Original Message-----

From: [REDACTED]

Sent: 01 September 2020 12:02

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass,

I feel most strongly that the CIZ designated for Wimbledon Village is maintained. There are quite enough licensed premises in the Village and with good weather the spill of imbibers onto pavements etc. is noisy and obstructive. Even this year, despite Covid-19, `Hemingways` at the bottom Of Lancaster Road is a case in point.

Yours sincerely,

[REDACTED]

From: [REDACTED]

Sent: 06 September 2020 11:50

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: RE: Licensing Policy Consultation - Proposed Changes to CIZ Wimbledon Village

Dear Sheila

It is my understanding that it is the Council's intention to cancel CIZ for Wimbledon Village on the grounds that there is insufficient evidence of incidents of crime and disorder, alcohol-related ambulance call outs or complaints about noise and disturbance to environmental health services etc. to justify continuing the CIZ protection. I have some concerns about this proposed change and hope that you will decide to continue with CIZ as it exists.

My husband & I have been fortunate to live [REDACTED] for past 26 years. When the Hotel du Vin started trading on Westside Common, a new license was issued to deal with the constant noise nuisance to local residents during events and afterwards in the carpark & on the Common.

Even with this more restrictive license in place, we have continued to experience noise nuisance problems, as recently as August last year. These were reported to Environmental Health & dealt with by Andrew Small. These are not reported crimes. This year has obviously been more peaceful for residents as weddings have not been permitted because of the Covid-19 virus.

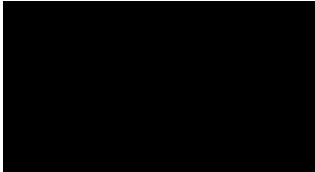
We are aware that the Hotel can apply to change the license at any time and that there is no obligation to notify neighbours as with planning changes.

I am sure you are aware that the existing license states that the 'Premise is an hotel and as such is open to the public 24 hours every day'. It also allows the hotel to 'supply alcohol on & off the premises to residents and guests 24 hours every day'. None of this is reassuring in terms of removal of CIZ for the neighbourhood.

In addition, prior to pubs re-opening, there was huge increase in noise nuisance & litter problems with the park & Common around Rushmere Pond, being used in the evenings mostly by youngsters with nowhere to go. It is of concern with no CIZ that Village will become the go to destination and social distancing will ignored and uncontrolled/uncontrollable. The rangers are having to spend increased time & money unnecessarily cleaning up litter & other mess left on the Common by late night ravers. The fence at the entrance to Cannizaro Park was damaged, the noticeboard was destroyed as was one of the statues along with various bollards. Again, litter and vandalism are not generally reported as crimes. I have attached a couple of photos.

I do hope that the decision will be to maintain the exiting CIZ balancing needs of business and local residents, to ensure that the Village & Common do not become a late night party venue as a result of the removal of Village CIZ and maintenance of the CIZ in Wimbledon Town Centre and Mitcham.

Regards









From: [REDACTED]

Sent: 17 August 2020 15:05

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Sheila

I live in the Wimbledon Village Ward.

I am in full support of the Cumulative Impact Zone remaining in Wimbledon Village area to maintain the benefit of the CIZ which by the quoted lack of incidents is clearly doing its job.

I can foresee no purpose in its removal and create the potential for Police and Emergency services to become involved in an area where the CIZ has clearly had a positive impact.

The council has a responsibility to safeguard the health and wellbeing of its residents.

This includes the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. All of these would be in danger threat should the CIZ be removed.

Yours sincerely

[REDACTED]

-----Original Message-----

From: 

Sent: 07 September 2020 23:09

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021 - 2026 and Cumulative Impact Assessment Wimbledon Village

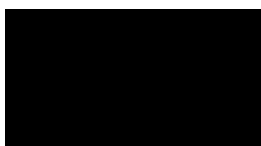
Attention of Licensing Officer, Ms Sheila Brass

Dear Madam

I do not agree with the proposal to take Wimbledon Village out of the CIZ for the following reasons:-

- 1 The CIZ in Wimbledon Village has worked well and this supports keeping CIZ here rather than removing it
2. There are many licensed premises in Wimbledon Village as well as flats above commercial premises and residential roads throughout the Village. Residents need the protection of the CIZ designation to minimise alcohol related noise, disturbance and nuisance.
3. If Wimbledon Village ceases to have CIZ status when Wimbledon Town Centre has CIZ then The Village will attract more late night drinkers with added noise and problems for residents
4. There is a danger that more licences and late night extensions will be granted in the Village. This will attract even more drinking places in the Village rather than shops. The result would be detrimental to residents and would adversely impact the whole character of the Village.
5. Residents in the Village have not been specifically surveyed by the Council on these CIZ proposals.

Based on the above I request that Wimbledon Village remains a Cumulative Impact Zone.



Sent from my iPad

From: [REDACTED]
Sent: 07 September 2020 14:46
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative impact Assessment

Dear Ms Brass

I write as a Village resident [REDACTED] to register some objections to the proposal to cancel the CIZ that has protected the Village since 2005.

The lack of recorded incident data illustrates the effectiveness of the CIZ policy, reducing the possible incidence of noise, anti-social behaviour and alcohol-related late-night nuisance.

There have been sufficient incidents of urination in gardens and doorways to indicate that without CIZ controls on late-night openings of bars and restaurants the bad behaviour of customers would be an even worse issue.

Wimbledon Town Centre has plenty of such problems even with a CIZ. The removal of such protection from the Village, with the likelihood of vacant retail spaces being converted into hospitality venues, carries the certainty, more than just the risk, of the Village becoming a focus for late-night revelry and resulting inconsiderate and anti-social conduct. Why should Village residents and Council employees be expected to clear up the inevitable resulting mess, of litter, ordure, urine and vomit in the streets?

There is no justification for this change of policy, not even as an experiment. There are already sufficient bars and restaurants in the Village as well as in the Town to cater for potential customers and to generate income and profits without increasing numbers of such establishments or permitting late-night operations. It would be a disgrace if the Village CIZ were to be withdrawn without consideration of the probable increased call on police and ambulance services to deal with resulting disorder and accidents.

I ask, even urge, that the withdrawal of CIZ status from the Village be abandoned and that the area remains a CIZ for at least the period under review.

Yours sincerely

[REDACTED]

From: [REDACTED]

Sent: 03 September 2020 17:28

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Cc: [REDACTED]

Subject: Consultation Licensing Policy 2021-2026 / Cumulative Impact Assessment / Wimbledon Village

We wish to object to the proposal by Merton Council to cancel the Wimbledon Village CIZ. We entirely concur with & adopt the reasons given by the Parkside Residents Association opposing cancellation.

We confirm we live in the Village Ward at the address given below.

[REDACTED]

From: [REDACTED]
Sent: 03 September 2020 12:25
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

I understand that there is a proposal to withdraw the CIZ status for Wimbledon Village.

I well remember the village before the introduction of the zoning and how unpleasant it very frequently was for local residents in late evening mostly because it attracted young people from far and wide who had no local interest, cared nothing for local people and inflicted noisy, drunken behavior late into the night, left the village in a mess the next morning and seemed to make drug dealing a normal street corner activity.

Following its introduction the situation became and has remained – for the most part but not always – more tolerable. The introduction of the zone took a long time to achieve, was opposed by those with vested interests – vested interests who would do the same to try to prevent the CIZ reintroduction were it ever lost and who feel absolutely no duty of care towards or interest in the lives of local residents.

The village has more than enough places to drink and eat – probably too many which is at the expense of a more balanced mix of shops and similar premises. In the evenings and at weekends particularly, it attracts visitors from many, many miles around. This may help those who have a vested interest in removing the CIZ but neither justifies additional licensed premises nor longer opening hours for existing licensed premises.

As a local resident I can see no reason to change the zoning and object strongly to the proposal which is a retrograde step and against the interest of local people. Their lives and views should be paramount.

[REDACTED]

From: [REDACTED]

Sent: 06 September 2020 23:00

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment (Wimbledon Village Ward)

Dear Ms Brass

Thank you for the opportunity for providing feedback for the consultation in respect of the Wimbledon village CIZ. I am a resident in the Wimbledon Village Ward. I understand that the Council is considering the removal of the special status of a Cumulative Impact Zone which has been applied to Wimbledon Village since 2005. I would strongly object to the removal of the CIZ as a resident for the following reasons:

1. The CIZ works well in the Village; this is a reason for its retention, not its removal. In the same way that laws are not repealed in peaceful areas to see if there will be an increase in crime.
2. in respect of criminality, I assume the local police support the removal of the CIZ? If they do not then there is no reason for its removal. Any increase in crime is unwanted and a burden on the police. The police (not to mention the NHS) have already enough to do with drink related crime.
3. If the Wimbledon Town CIZ is retained while that of the Village is removed, the result will be to funnel late night drinking to the Village.
4. With Covid-19, promoting late night drinking is unhelpful for a number of reasons not least social distancing will either be out of doors which will add to the late night noise or indoors where it will be non-existent.
5. The extension of licensing will not create new jobs in Wimbledon, it will simply increase the profits of a small number of pubs and bars.

I have set these and other points in more detail below for your consideration:

The present system works. Why change it? The commercial premises in Wimbledon Village are surrounded by residential roads and there are also flats above many of the units in the High Street and Church Road. As was the case in 2005 there are many residents who are vulnerable to the noise, disturbance, nuisance and other alcohol related issues caused by the behaviour of customers of licensed premises. Given the density of licensed premises the risks of these incidents occurring will continue and may escalate unless properly controlled by CIZ protection.

The Council's case refers to low levels of recorded incident data in Village Ward but the data cited references incidents which are primarily examples of crime and disorder. This low incidence is not surprising because the Village CIZ was designated in response to issues of nuisance and antisocial behaviour rather than crime and disorder. The majority of nuisance etc. incidents, by their nature,

tend not to be reported to the police or the Council but they are still legitimate concerns for protection in a Licensing Policy.

)Withdrawing CIZ protection in the Village whilst retaining it for the Town Centre also risks promoting the Village as a destination where late night drinking is encouraged. There are empty units in the High Street which could attract yet more restaurants rather than shops; without CIZ protection we could see more licences being granted as well as late night extensions for alcohol sales to boost trade. This would materially change the character of the Village for the worse and to the detriment of residents.

)An important proposal of this nature should be supported by survey evidence from residents in the affected area. No such survey has been undertaken; instead the Council is relying upon responses to questions about general perceptions of safety obtained from a 2019 borough wide sample survey which included only a very small number of Village Ward residents and made no reference to proposed changes in Licensing Policy.

)Residents living in and around the Village have spoken of their concerns about nuisance, noise and disturbance, littering, parking problems etc especially at weekends. An emerging local issue however is the frequency of noisy, late night gatherings on Rushmere on Wimbledon Common where alcohol is consumed and excessive amounts of litter are left behind. This is not the time to introduce relaxations in Licensing Policy which will lead to an increase the availability of alcohol in the Village.

As a result I strongly object to the removal of the existing CIZ status and would request that these issues are considered by the Council.

Thank you for your attention,



From: [REDACTED]

Sent: 06 September 2020 15:57

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

“Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment”

To The Licensing Officer, Sheila Brass

I have read of the proposals to remove the CIZ designation for Wimbledon Village and am appalled. I live in [REDACTED], within the conservation area in [REDACTED] and which is included in the Village Ward

The pressure in the Village from applicants wishing to open licensed premises was mounting for many years prior to the CIZ designation, to the extent that they now dominate the area. The introduction of the CIZ in 2006 has been helpful as at the very least it has enabled residents (including me; I have given evidence at several hearings) to make representations relating particularly to the question of late night openings, the achievement of which has been one of the primary objectives of applicants.

The issue of crime and anti-social behaviour, largely fuelled by alcohol, is also of vital concern to me and many other residents. I have certainly experienced a great deal of casual and very inconsiderate behaviour. Screaming as groups walk home or to their cars, banging doors and revving unnecessarily loudly, well into the small hours. The roads immediately surrounding the High Street are essentially residential. Late night noise is unnecessary and unreasonable. Rubbish, including broken bottles, is dumped in my front garden for me to walk on as I go out in the morning. Not infrequent keying of my car at night. Just malicious damage from which the culprit gains nothing except presumably some curious satisfaction from inconveniencing me and increasing my insurance premium. The relationship between this and the overwhelming prevalence of licensed premises is clearly evident.

The incidence of problems relating to noise, drunken and anti-social behaviour is so commonplace that experience shows that reporting such matters rarely results in any effective action. So statistics regarding reported incidents are misleading as to the situation on the ground.

The designation of the Village as a CIZ is about the only weapon in the hands of residents in challenging yet further growth in the damage done to our welfare and our living environment. To deprive us of that would be wrong. I am sure that there are plenty of businesses in the Village who must suffer, as we residents, from the petty vandalism and more serious crimes which impact on their insurance and repair costs. Costs which they could well do without in these times of retail strain.

For these reasons I am strongly opposed to the withdrawal of the CIV designation from Wimbledon Village while supporting the retention of that for the Town Centre.

From [REDACTED]

Sent: 02 September 2020 15:59

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass

As a resident of [REDACTED], I am writing to object to the proposal that the Cumulative Impact Zone for Wimbledon Village be cancelled.

It has worked quite well until now in controlling adverse and unruly behaviour, precisely because it was in place, and relaxation can only have a negative impact.

We can see from the recent behaviour on and around Wimbledon Common, especially close to Rushmore Pond, that the wider zone needs to be closely monitored, and ending the CIZ would push things in the wrong direction.

Kind regards

[REDACTED]

From [REDACTED]
Sent: 07 September 2020 20:42
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc: [REDACTED]
Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

I am a resident of Wimbledon Village and have lived in [REDACTED] for the past 32 years. I wish to object to the suggestion that the current village CIZ designation should be withdrawn. CIZ protection has been important and was originally introduced because of the incidence of nuisance, noise disturbance and anti social behaviour experienced by residents of Wimbledon village.

Since then CIZ protection has worked. The argument for the cancellation of this CIZ is that there is insufficient incidence of crime and disorder, alcohol related ambulance call outs and complaints about noise and disturbance to environmental health services and the police to justify continuing the CIZ protection. This is an entirely circular argument. The reason for the absence of such disruption is because the CIZ exist and its withdrawal would have a major impact I believe on life in the village.

There are currently a number of premises in the village which are vacant and might therefore attract applications to become licensed premises. This is not the time, I believe, to introduce a significant relaxation in licensing policy which will lead to an increase of the availability of alcohol in the village.

For these reasons I strongly believe that the current policy should be maintained and there should be not relaxation of the existing policy

Yours sincerely

[REDACTED]

From: [REDACTED]
Sent: Monday, August 31, 2020 8:50:29 PM
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment

Dear Ms Brass

I am writing in to express my ongoing support of the CIZ in Wimbledon Village.

The High Street area of the village is a mix of licensed premises, shops and residential properties. The bars, pubs and restaurants are a great draw for visitors but they come with associated problems of noise, disruption and rubbish. The CIZ offers the residents some protection from an increased number of premises or those opening later. I believe that the current licensing arrangements offer a good status quo between the businesses and residents in the area.

I believe that the survey used as evidence in this decision is based on too small sample size of village residents to be meaningful. I also understand that the respondents were not asked about licensing related matters, such as nuisance incidents. Such surveys may also under-represent the local concern as I believe that many low-level incidents such as noise complaints or rubbish are never reported officially to the council or police. A full review of the CIZ should be completed before its removal is considered, with feedback from a large number of residents, particularly those in streets that are close to the High Street.

I believe that without powerful evidence there is no justification in removing the CIZ designation for Wimbledon Village.

kind regards

[REDACTED]

Sent from [Mail](#) for Windows 10

From:

Sent: 02 September 2020 09:49

To: Sheila Brass <Sheila.Brass@merton.gov.uk>

Subject: Licensing Policy

The CIZ has worked effectively in the Village; this is a justification for its retention, not its removal.

I have read other reasons for keeping the CIZ which I agree with.

Sincerely

A solid black rectangular box used to redact the sender's name and signature.

From: [REDACTED]
Sent: 07 September 2020 15:04
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Subject: "Consultation, Licensing Policy 2021-2026 and Cumulative Impact Assessment"

Dear Sheila

I am emailing in support of Merton Council's proposal to lift the CIZ around Wimbledon Village.

As a resident now living centrally in the heart of the Village who has lived in the area for 15 years I can say I have seen shops, bars, restaurants and businesses open and close with alarming frequency over the past few years. It is my view that any move to bring more bars or restaurants into the village will serve to increase footfall and will benefit all businesses and retail outlets alike.

The Village is a safe, friendly place and we have very little problem with antisocial behaviour - my husband and I welcome new visitors and look forward to supporting new businesses in the future.

Kind regards

[REDACTED]

From: [REDACTED]
Sent: 06 September 2020 20:32
To: Sheila Brass <Sheila.Brass@merton.gov.uk>
Cc: Licensing <Licensing@merton.gov.uk>
Subject: Consultation, Licensing policy 2021-2026 and Cumulative Impact Assessment

For the attention of Sheila Brass, Licensing Officer, Merton Council

Dear Ms Brass,

I am writing to object to the Council's proposed cancellation of the Cumulative Impact Zone (CIZ) in Wimbledon Village and to ask that the Council keep the Village CIZ.

I am [REDACTED] and have lived at [REDACTED] for the last 33 years. [REDACTED] the Dog and Fox Hotel which has recently been refurbished to accommodate another dozen hotel rooms and entertainment areas, this is particularly concerning for me. Should the CIZ be removed this would allow the playing of loud music, loud voices and alcohol related disturbances to impact on my sleep as well as on other residents [REDACTED].

I strongly support and endorse [REDACTED] objections sent to you in their email of 3rd September 2020 and appeal to the Council to retain the CIZ as it stands at present.

Yours sincerely

[REDACTED]

From: [REDACTED]
Subje [REDACTED] **d Cumulative Impact**
Assessment
Date: 3 September 2020 at 10:51:24 BST
To:
Cc: [REDACTED]

For the attention of Sheila Brass, Licensing Officer, Merton Council

3 September 2020

Dear Ms Brass

We are writing to object to the Council's proposed cancellation of the Cumulative Impact Zone (CIZ) in Wimbledon Village and to ask that the Council keep the Village CIZ.

We are [REDACTED]. We live at [REDACTED] in a street that mainly runs parallel to the High Street. Our house is [REDACTED] but within earshot of the High Street, which in happier times, pre-Covid 19, was a thriving commercial area with a fair share of cafes, restaurants and pubs.

It was also a civilised entertainment area largely because the CIZ ensured that premises supplying alcohol and/or playing loud music did not operate into the early hours of the morning. Thanks to the CIZ, a balance was achieved pre-Covid between the commercial interests of the High Street and the interests of residents who need to sleep at night.

We have read the Council's Cumulative Impact Analysis and it now appears that the Council is proposing to scrap a measure that has worked well for the Village on the flimsiest of evidence in times of great uncertainty.

The document makes no case for there being any demand to end the CIZ. Instead, the Council relies on favourable incident statistics and vague assertions of residents' level of contentment with life in Wimbledon Village to justify a change of policy that has worked well for 15 years. It takes no account of the fact that residents need to sleep well at night.

We have lived in this house long enough to remember conditions in the 2005-6 period, before the CIZ began to work effectively and when there was a proliferation of bars and other establishments in the Village operating to around midnight. If you search your files you will find that we wrote to the Council's licensing department on January 15th 2006 to report as follows: "Since the beginning of the year, one or the other of us has been woken on successive Saturday mornings between 00.30 and 01.00 AM by loud voices, the clattering of high heels, and the banging of car doors as the clients of some of Wimbledon Village's many licensed premises have come along Homefield Road to find their transport home."

This is what we can expect if the CIZ is scrapped. We realise that the Council is obliged by the terms of the Licensing Act 2003 to review its licensing policy at this time. With many Village retail outlets and cafes now closed as a result of the pandemic, we can understand why the Council might want to encourage the hospitality industry to take up vacant premises so as to boost employment and business rate income.

But the midst of a pandemic is surely the worst possible time to contemplate a radical change in the conditions created by the CIZ which have hitherto proved beneficial for residents -- who are also council tax payers.

Please remember that you are setting policy for a five year period to 2026. Although the hospitality trade is in a terrible state at present, we cannot assume that these conditions will last for ever. A Covid vaccine or other public health intervention may restore conditions in which running a bar late at night will again be a very profitable enterprise. And in those conditions, the Village would again emerge as catnip for people in the sector anxious to recoup revenues and profits lost during the crisis by seeking late night licenses.

You may think this vision far-fetched. But back in 2005, the Village was threatened with widespread "alcoholisation" as businesses vied to apply for licenses to sell alcohol and provide entertainment into the early hours of the morning.

Again, if you look into your files, you will find that on the 25th August 2005, we wrote to the Council's licensing department to protest about a specific application to extend alcohol consumption into the early hours of the morning. Our letter contained the following paragraphs which should give you an idea of what could happen if the CIZ is abolished and the Covid-19 crisis eases. Referring to individual establishments, we wrote:

"A walk along the High Street in the Village reveals the following applications:

i) SW19 – Alcohol and entertainment until midnight during the week and 1AM at weekends.

ii) The Common Room. Alcohol and entertainment until 2AM.

iii) The Dog and Fox, including Bayee Village and Finches. Alcohol, live music and dancing until midnight Sunday to Wednesday, until 1AM Thursday to Saturday, and until 2 AM on around 30 days a year.

iv) The Rose and Crown. Alcohol and entertainment until midnight Sunday to Thursday, 1AM Friday and Saturday and 2AM on more than 40 days a year.

v) The Brewery Tap. Alcohol until midnight Sunday to Thursday and 1AM Friday and Saturday."

Fortunately, the Council at that time listened to our plea and those of other Village residents and introduced the CIZ. Please do not undo that good work by scrapping the CIZ today. It is a policy that has worked and which should be retained.

We will copy this email to the Village Ward councillors.

Yours sincerely

