

Cumulative Impact Analysis

1. Introduction

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

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

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

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

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

This report lays out the evidence underpinning the proposal to:

- retain the two existing cumulative impact areas, Wimbledon Town Centre and Mitcham Town Centre:

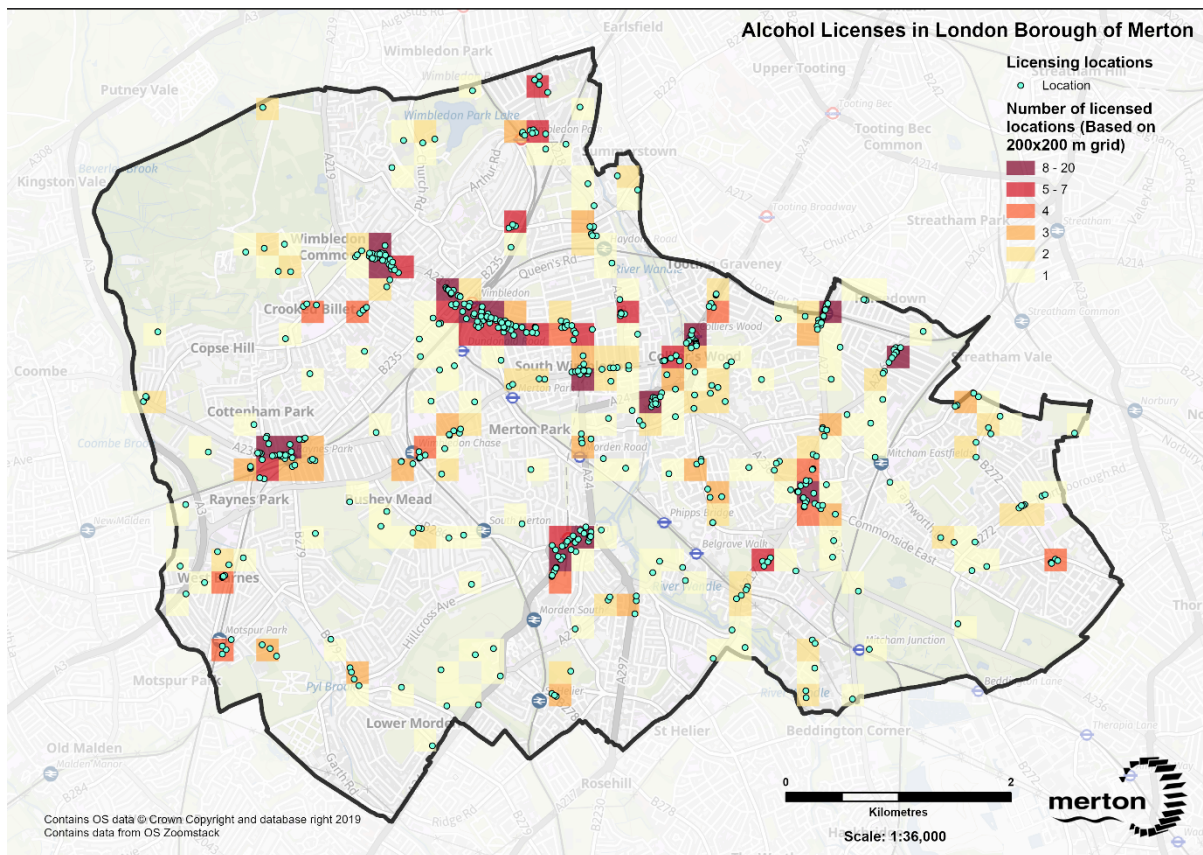
- not include any other area of the borough in the Cumulative Impact Assessment at this time.

2. Council Wards



3. Licensed premises

There are currently 559 licensed premises in Merton. The borough has five main commercial centres; Colliers Wood, Mitcham, Morden, Raynes Park and Wimbledon. From the map it can be seen that the highest concentrations of licensed premises lie within these commercial centres with Wimbledon commercial centre having the most licensed premises in the borough. However, it should be noted that not all these premises have licences to sell alcohol, some may be licensed to sell hot food only after 23.00 hours or to provide only public entertainment. A more detailed analysis of the number and type of licensed premises in each of the two existing Cumulative Impact areas are shown later.



4. Residents Survey 2021

The London Borough of Merton carried out a survey of 1,005 local residents aged 18+ and 110 young people aged 11-17 between April 6th and April 23rd May 2021. The survey explored resident perceptions of their local area and council services and, amongst other matters, measured perceptions of the local safety, levels of anti-social behaviour, and community cohesion within the borough.

The full survey results can be found on the Council's website:

<https://www.merton.gov.uk/council-and-local-democracy/performance/annual-residents-survey>

The survey results show that most Merton residents are satisfied with their local area as a place to live (86%). This represents a small but significant 3% fall compared to 2019. Feelings of safety in the local area have declined substantially compared to 2019, with just 63% saying that they feel safe going out after dark compared to 84% in 2019. Residents in South Wimbledon and South West Merton are more likely than average to feel very or fairly safe during the day. In contrast, East Merton and Mitcham residents are significantly more likely to feel unsafe. There is a high degree of variability between ward clusters in feeling safe after dark. In North Wimbledon, South Wimbledon and South West Merton around three in four residents feel safe, but in North East Merton and East Merton and Mitcham this drops to one in two or fewer.

Appendix B

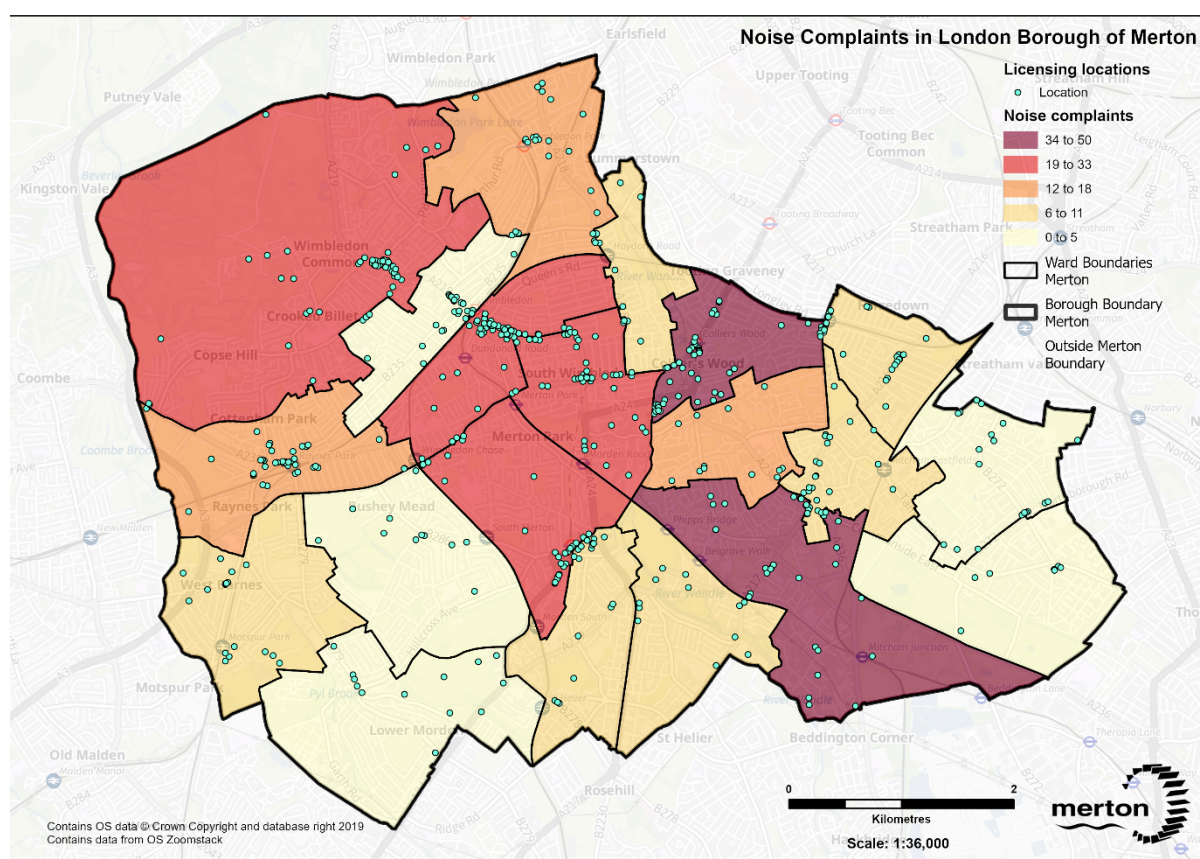
The survey results for young people shows that they are satisfied with their local area (89%) although this represents a 6% point decline on the score in 2019 (95%). Young residents are more positive compared to 2019 about Merton Council keeping them informed about what they are doing (47% cf. 34%) and involving young people when making decisions (36% cf. 23%). The survey result also shows that 'Merton Council does enough to protect young people' (60%).

Concerns regarding some issues like drug use/dealing and anti-social behaviour are more concentrated in specific areas, notably East Merton & Mitcham and South Mitcham & Morden.

Issue (% a problem)	Total	North Wimbledon	South Wimbledon	South West Merton	East Merton & Mitcham	South Mitcham & Morden	North East Merton
People using/dealing drugs	31%	21%	22%	16%	53%	41%	37%
Anti-social behaviour	30%	25%	16%	22%	43%	38%	37%
People drunk or rowdy in public places	23%	15%	23%	8%	42%	25%	27%

5. Noise and other complaints relating to licensed premises.

Between April 2020 and March 2023 Merton Council received 330 complaints relating to 159 licensed premises or events in the borough. The number of public nuisance complaints post COVID-19 has increased in the Borough. 80 complaints were received between 2020/21 relating to 41 licensed premises, in 2022/21 108 complaints relating to 58 licensed premises and in 2022/23 142 complaints relating to 60 licensed premises.



6. Trading Standards – Test Purchases

Between April 2020 and March 2023, Merton Trading Standards conducted 174 alcohol test purchases and challenge 25 age policy. Challenge 25 age policy make up a large proportion of these than underage sales of alcohol. Below is the breakdown of the results:

- April 2020 - March 2021 61 TPs with 52 sales
- April /2021 – March 2022 80 TPs with 39 sales
- April 2022 - March 2023 33 TPs with 1 sale

All test purchases are carried out in premises selling alcohol for consumption off the premises.

7. Ambulance call outs

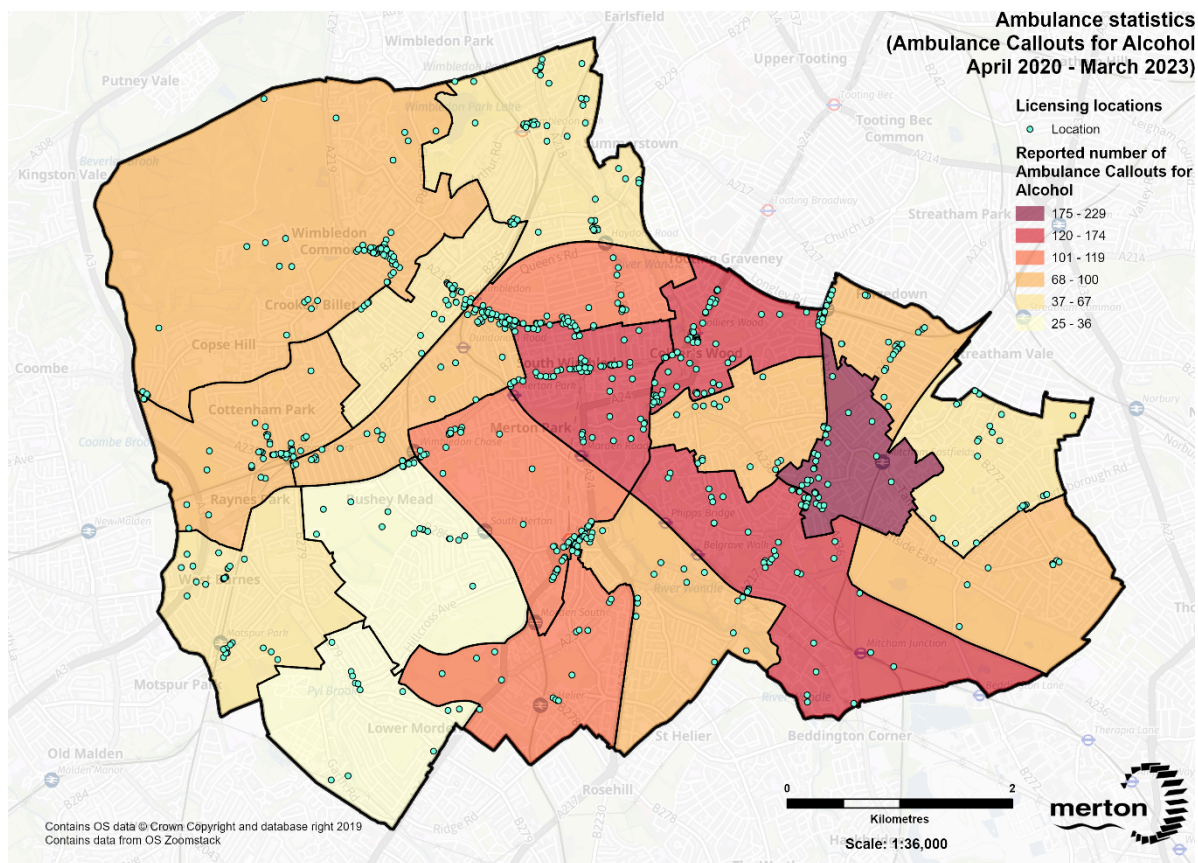
The number of alcohol –related ambulance callouts in Merton varies by time of day. Ambulance callouts for alcohol peaks between 1-2pm in day time, between 8pm and 9pm and again between 11pm and midnight, whilst ambulance callouts for assaults begin to see an upward trend from 4pm and peak between 10pm and 11pm. Calls significantly drop off from 3am. There appears to be a strong link between ambulance call outs and hours granted for the sale of alcohol.

Figges Marsh, Abbey, Colliers Wood and Cricket Green Wards have the highest ambulance call outs for alcohol over this period, with Figges Marsh also having the highest level of ambulance callouts for assaults.

Ambulance callouts for alcohol (Paramedic derived only)

Time Period: April 2020 - March 2023

Data Source: London Ambulance Service via SafeStats



Ward Name	Count
Abbey	174
Cannon Hill	25
Colliers Wood	150
Cricket Green	146
Dundonald	87
Figges Marsh	229
Graveney	90
Hillside	58
Lavender Fields	80
Longthornton	67
Lower Morden	36
Merton Park	119
Pollards Hill	85
Ravensbury	100
Raynes Park	76
St. Helier	118
Trinity	119
Village	87
West Barnes	52
Wimbledon Park	53

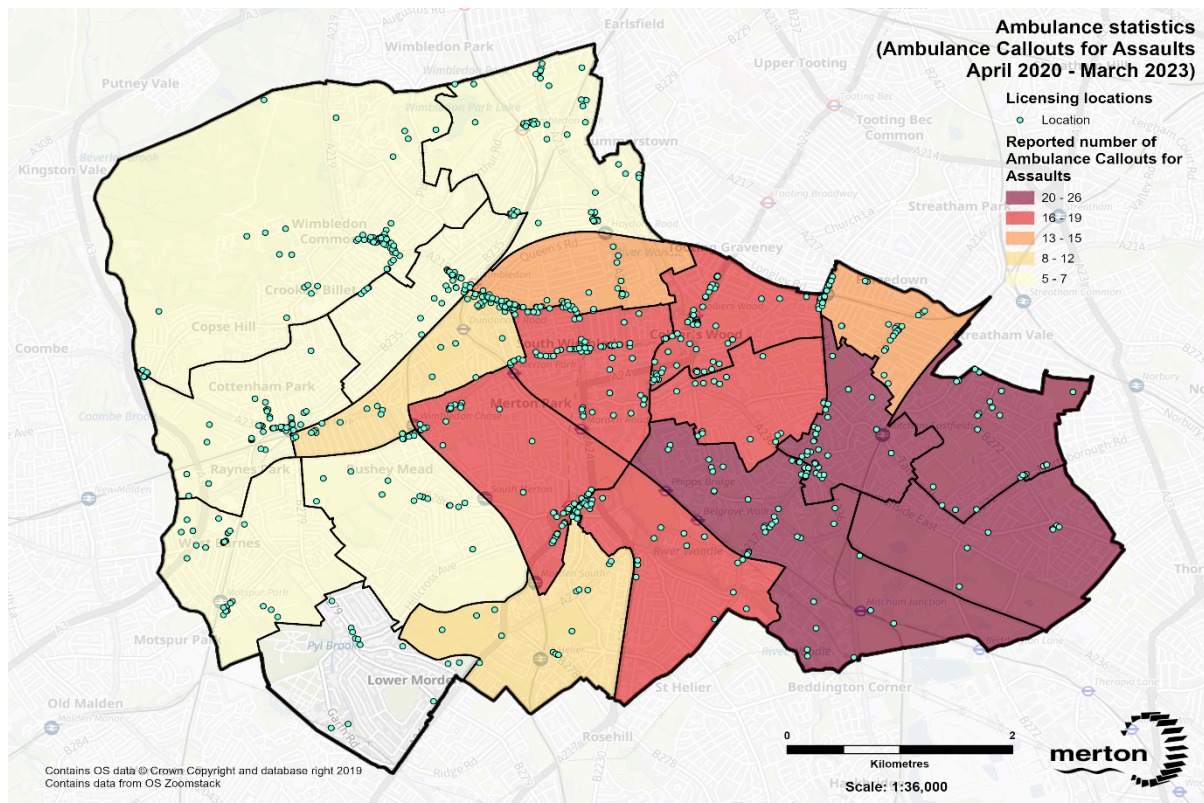
From 11am paramedic-derived calls for alcohol-related incidents begin to increase steadily, peaking between 1-2pm (93 calls), between 8pm and 9pm with 125 calls and again between 11pm and 12am with 139 calls.

Call numbers begin to decrease significantly after 2am.

Ambulance callouts for assaults (Caller derived)

Time Period: April 2020 - March 2023

Data Source: London Ambulance Service via SafeStats



Ward Name	Count
Abbey	19
Cannon Hill	5
Colliers Wood	17
Cricket Green	25
Dundonald	10
Figges Marsh	26
Graveney	14
Hillside	6
Lavender Fields	18
Longthornton	23
Merton Park	18
Pollards Hill	23
Ravensbury	18
Raynes Park	5
St. Helier	12
Trinity	15
Village	6

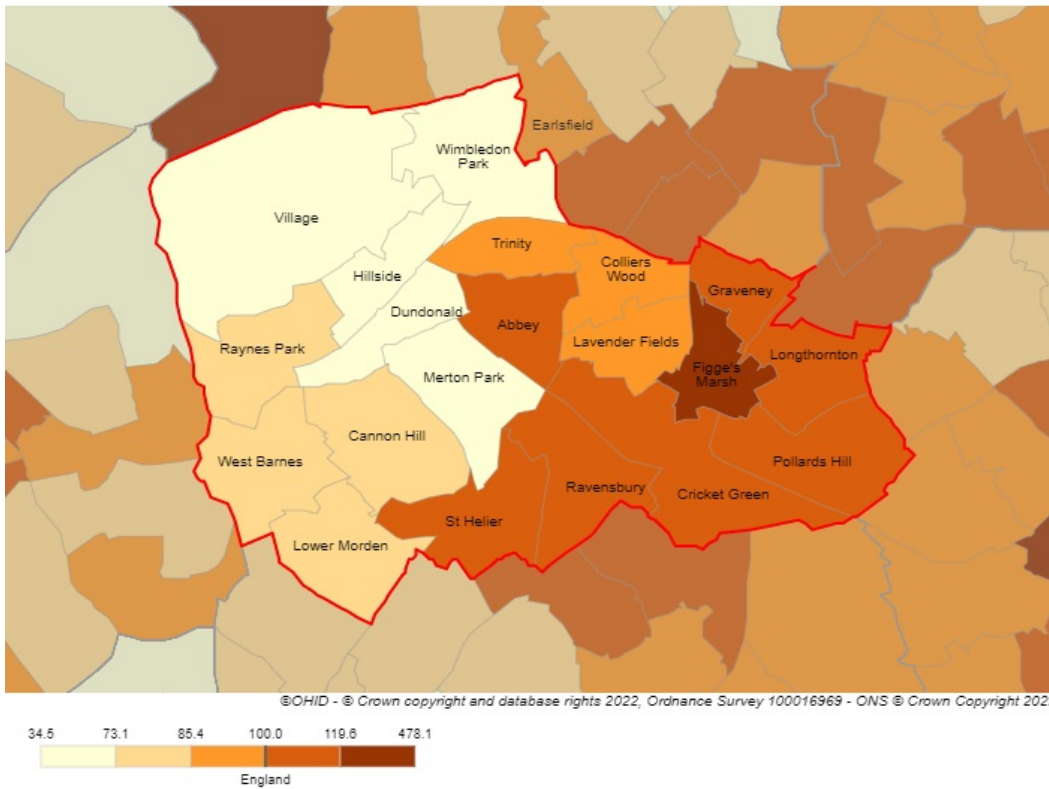
Caller-derived assaults see a peak between 12pm and 1pm with 14 calls across this three-year period, increasing steadily from 10am with further peaks between 4pm and 5pm (19 calls), 8pm and 9pm (20 calls) and between 10pm and 11pm (26 calls).

Call numbers fall significantly from 3am.

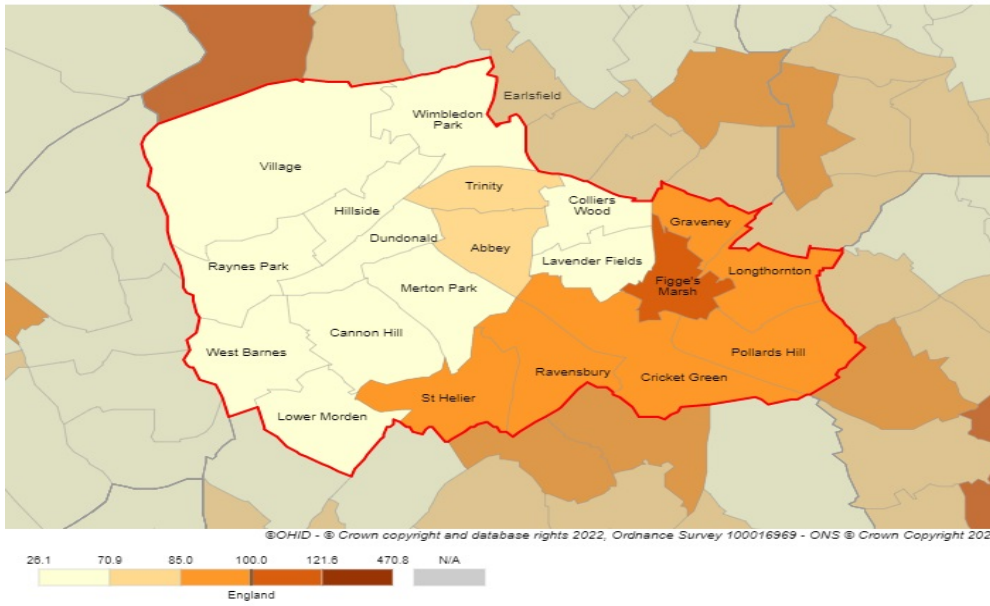
West Barnes	5
Wimbledon Park	7

8. Hospital admissions for alcohol related conditions

Hospital admissions for alcohol attributable conditions (Broad definition) (SAR) - Source: Hospital Episode Statistics (HES) NHS Digital



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



(C) Rank of Merton Wards for alcohol-related hospital admissions, broad and narrow definitions, during the period 16/17 to 20/21

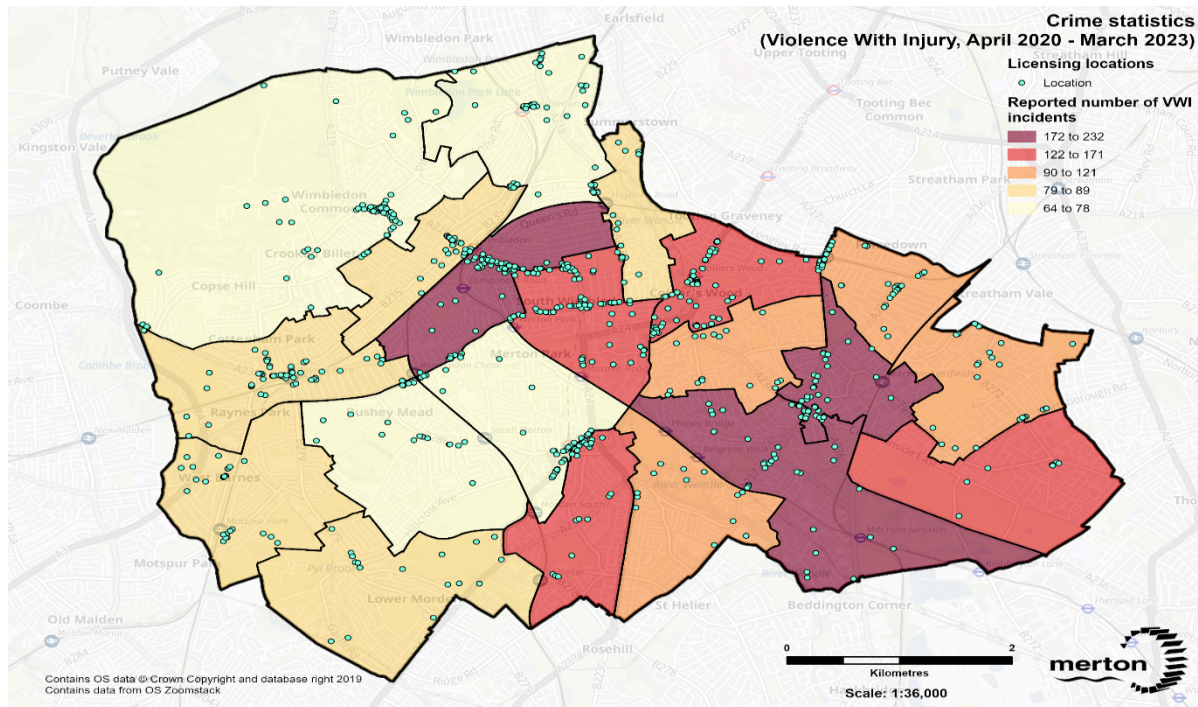
Ward	Hospital admissions for alcohol attributable conditions (Broad definition)	Hospital admissions for alcohol attributable conditions, (Narrow definition)
Abbey	100.7	81.2
Cannon Hill	79.1	67.5
Colliers Wood	86.5	67.6
Cricket Green	113	86.1
Dundonald	54.3	47
Figge's Marsh	122.5	102.9
Graveney	111.8	99.4
Hillside	68.7	61.5
Lavender Fields	95.5	64.5
Longthornton	104.1	98.3
Lower Morden	83.7	64.5
Merton Park	67.8	53.8
Pollards Hill	111.1	97.9
Ravensbury	101.4	89.5
Raynes Park	75	58.3
St Helier	118.5	98.3
Trinity	90.7	71.5
Village	59.9	53.2
West Barnes	79.8	64.7
Wimbledon Park	71.6	53.7

9. Violence with injury – non domestic

Cricket Green, Figges Marsh, Wimbledon Town and Dundonald wards have the highest levels of violence with injury (non-domestic) reports. The areas of the existing Wimbledon Town Centre CIZ and the Mitcham Town Centre CIZ were seen to have high levels of violence with injury – non domestic offences.

Time Period – April 2020 – March 2023

Data Source – Metropolitan Police Service



Ward Name	Non Domestic Abuse VWI Offs
Abbey	156
Cannon Hill	72
Colliers Wood	146
Cricket Green	232
Figge's Marsh	230
Graveney	113
Hillside	89
Lavender Fields	121
Longthornton	117
Lower Morden	82
Merton Park	78
Pollards Hill	171
Ravensbury	111
Raynes Park	89
St Helier	156
Village	64
Wandle	80
West Barnes	89
Wimbledon Park	75
Wimbledon Town &	224

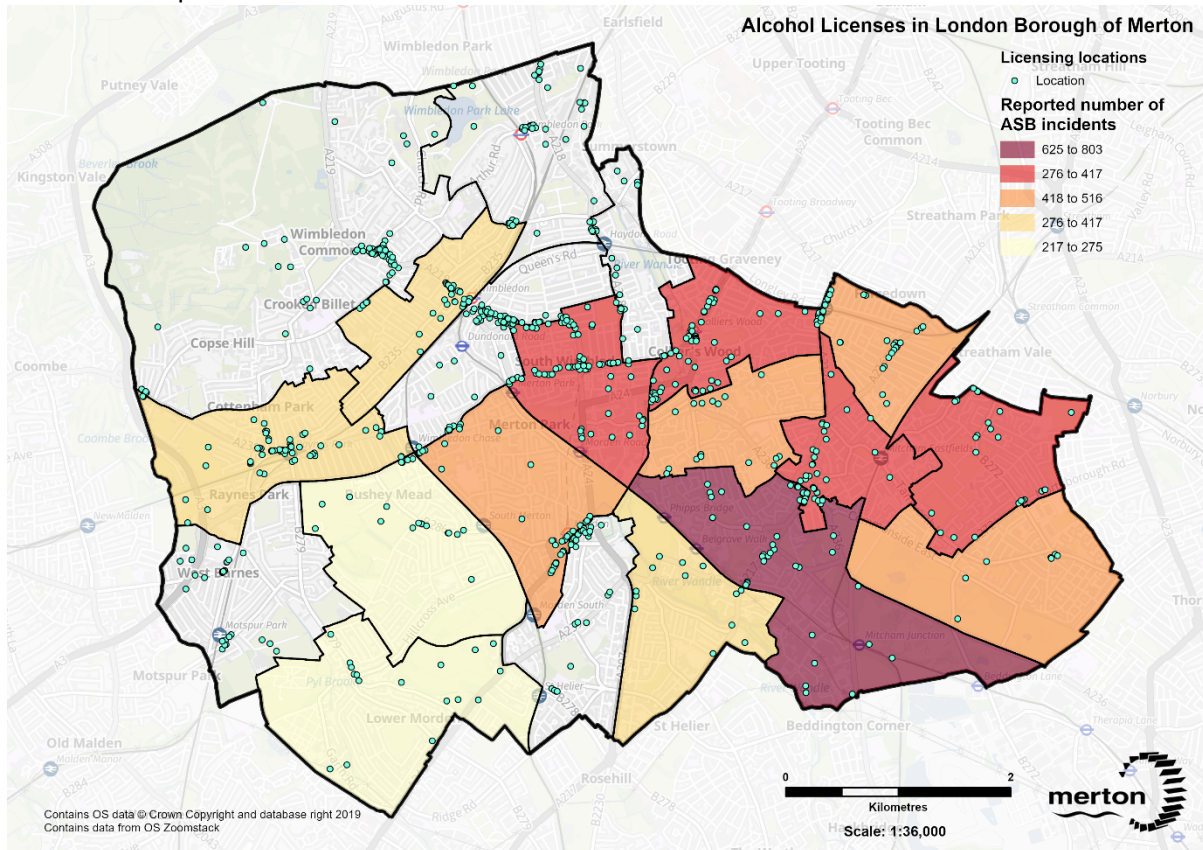
Anti-social behaviour, rowdy and inconsiderate behaviour

Cricket Green, Wimbledon Town & Dundonald, Figges Marsh and Colliers Wood Wards have the highest levels of ASB complaints.

ASB nuisance, rowdy and inconsiderate behaviour

Time Period: April 2020 - March 2023

Source: Metropolitan Police Service



Ward Name	ASB Calls
Abbey	543
Cannon Hill	217
Colliers Wood	624
Cricket Green	803
Figge's Marsh	563
Graveney	494
Hillside	340
Lavender Fields	515
Longthornton	556
Lower Morden	275
Merton Park	490
Pollards Hill	516

Ravensbury	404
Raynes Park	417
St Helier	477
Village	392
Wandle	217
West Barnes	336
Wimbledon Park	403
Wimbledon Town &	677

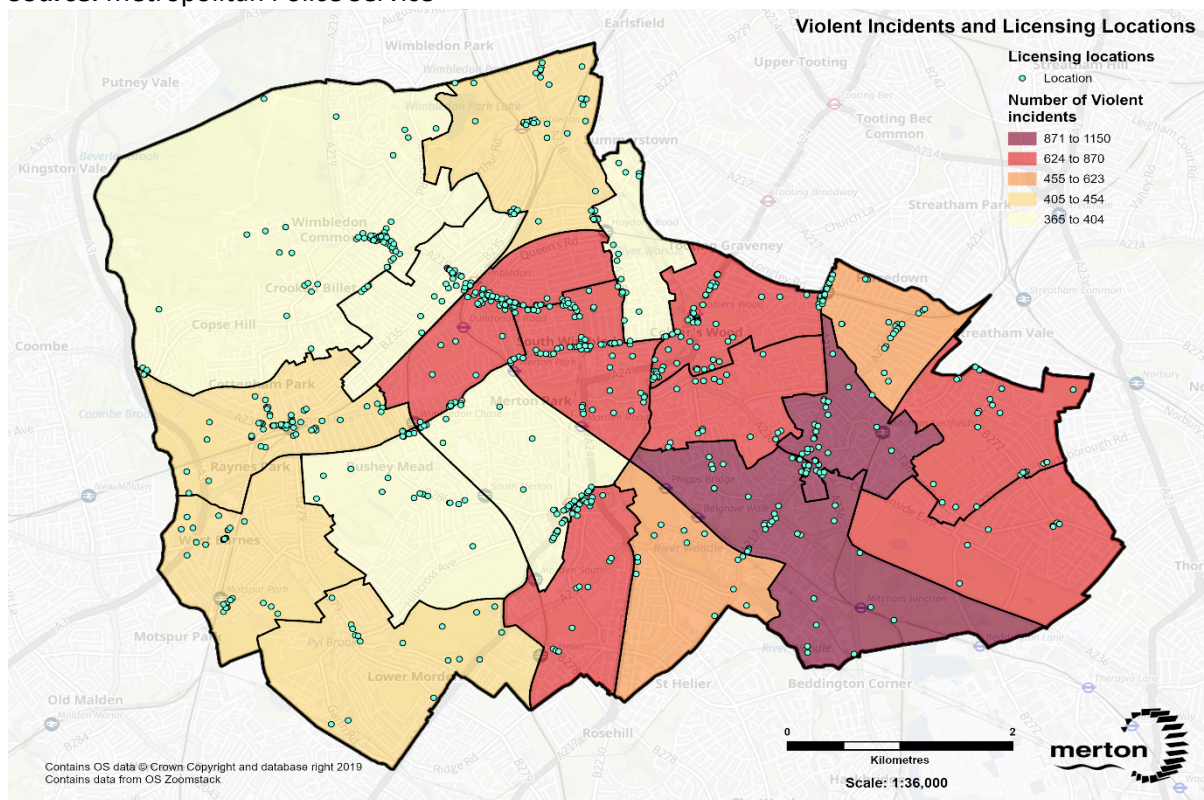
10. Violence against the person

Below is a map of violence against the person (with and without injury) recorded by the Metropolitan Police between April 2020 and March 2023 boundaries. This includes domestic and non-domestic calls. The map provides a more localised picture of police reports on violence than shown in the Ward analysis above but confirms that the two existing Cumulative Impact Areas of Wimbledon Town Centre and Mitcham Town Centre lie within areas of the highest police callouts for violent incidents.

Violence against the person

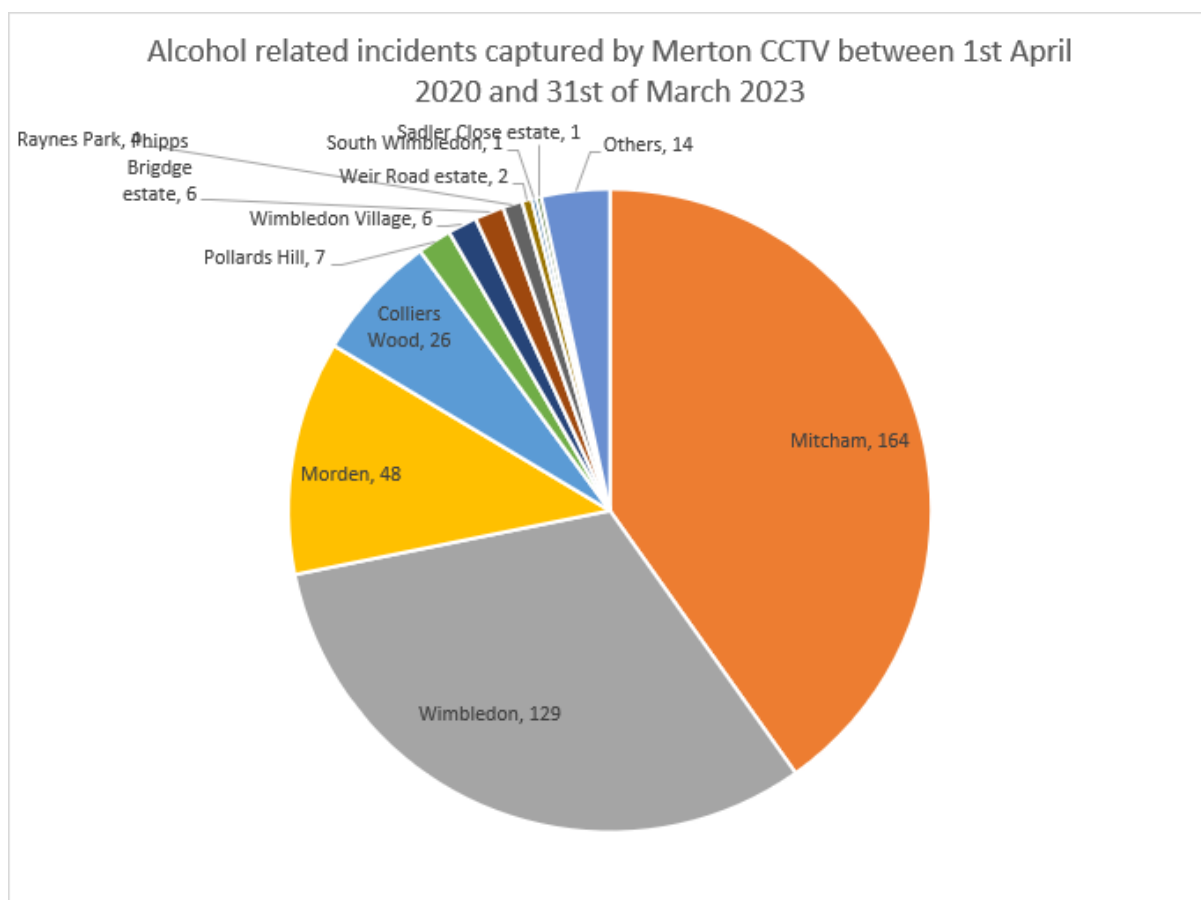
Time Period: April 2020 – March 2023

Source: Metropolitan Police Service



Ward Name	11 Violence Against the Person Offs	Violence with Injury Offs	Violence without Injury Offs
Abbey	719	234	485
Cannon Hill	365	118	247
Colliers Wood	711	231	480
Cricket Green	1120	357	763
Figge's Marsh	1150	357	792
Graveney	623	192	431
Hillside	390	128	262
Lavender Fields	746	220	526
Longthornton	783	214	569
Lower Morden	454	128	326
Merton Park	404	106	297
Pollards Hill	870	288	581
Ravensbury	576	185	391
Raynes Park	453	141	312
St Helier	707	237	470
Village	385	106	279
Wandle	398	130	268
West Barnes	436	132	304
Wimbledon Park	430	142	288
Wimbledon Town & Dundonald	783	264	518

12. Alcohol related incidents captured by Merton CCTV



13. Meet Street Pastors for Wimbledon Town Centre and Mitcham

Alcohol related incidents	2
ASB nuisance drunk and disorderly, rowdy and inconsiderate behaviour	19
Violence against the person	3

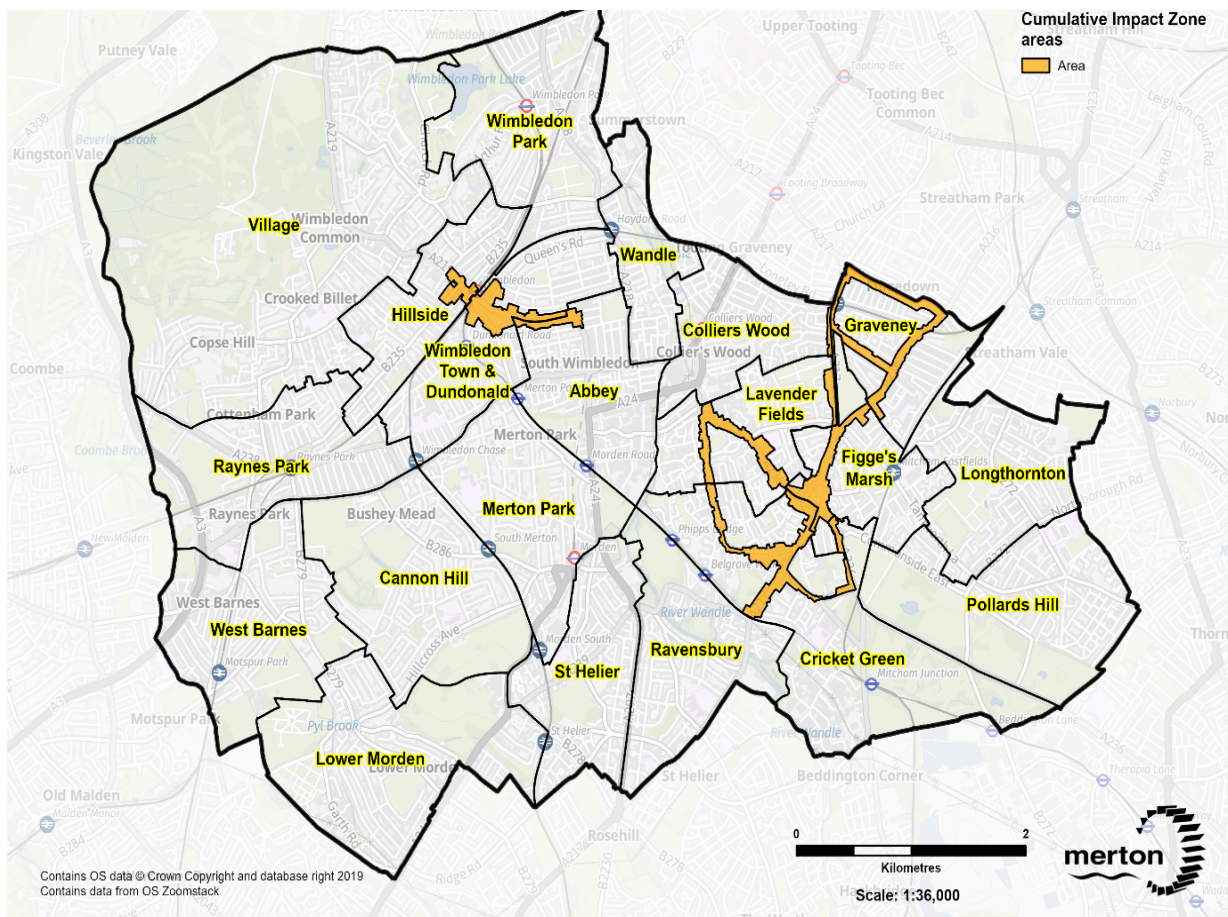
14. Merton Council Antisocial Behaviour Team Data

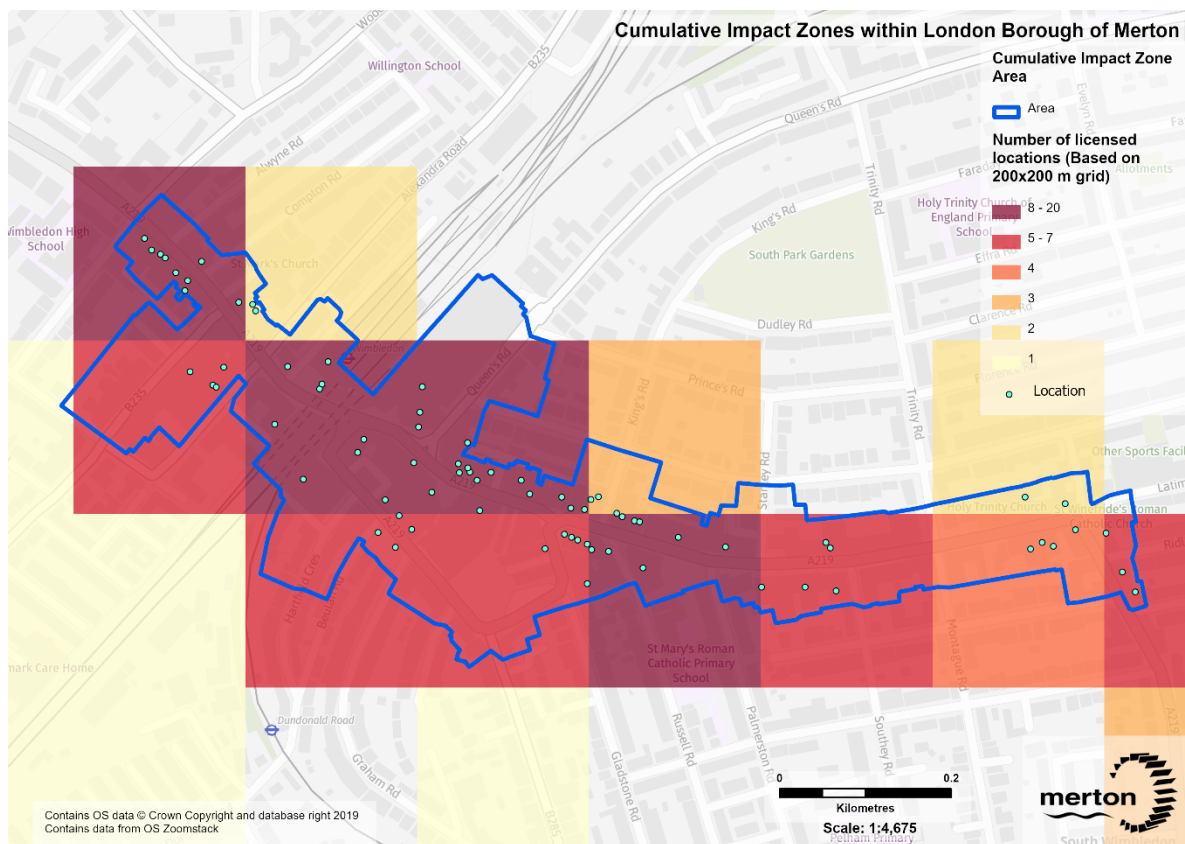
April 2022 – March 2023 alcohol related (including street drinking):

WARD	No of Reports
Abbey	8
Cannozn Hill	1
Colliers Wood	11
Cricket Green	13
Dundonald	5
Figges Marsh	29
Graveney	42
Hillside	6
Lavender Fields	6
Longthornton	21
Lower Morden	2
Merton	2
Merton Park	5
Pollards Hill	12
Ravensbury	5
Raynes Park	1
St Hellier	5
Trinity	9
Village	2
West Barnes	2
Wimbledon Park	3
Wimbledon Town & Dundonald	3
TOTAL	193

15. Current Cumulative Impact Zones

Currently there are 2 Cumulative Impact Zones in the Borough. Wimbledon Town Centre was adopted in 2006, shortly after the implementation of the Licensing Act 2003 and Mitcham Town Centre was approved in 2015. The areas covered by the current policy are shown in the map below.



16. Wimbledon Town Centre CIZ

(a) Active licences within Wimbledon Town Centre CIZ

Type	Number
Cinema/Theatres	4
Bar/Club/Pub	19
Restaurants	34
Convenience stores/supermarkets/off licence	15
Hotels	4
Takeaways/premises selling late night food only (no alcohol)	7

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

Total number of premises	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 02.00 hours	Terminal hour 02.01 hours – 03.00 hours	No restriction
76	39 (51%)	21 (28%)	12 (16%)	3 (4%)	1 (1%)

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

Total number of premises	Terminal hour up to 01.00	Terminal hour 01.01-02.00 hours	Terminal hour 02.01 – 03.00 hours	Terminal hour 03.01 hours – 05.00 hours
7	2	1	2	2

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

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

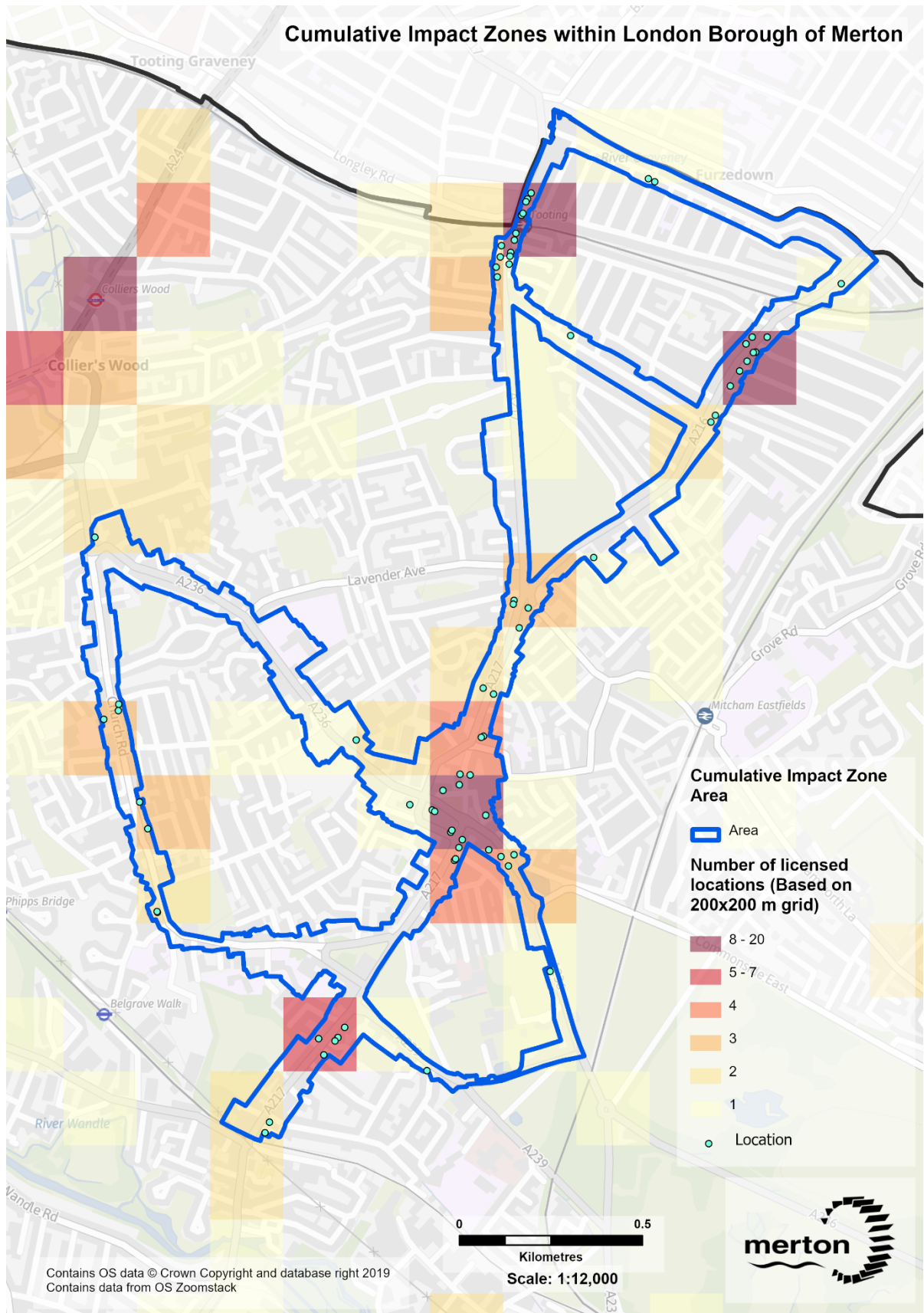
In publishing this cumulative impact assessment, the authority is setting down a strong statement of approach to considering applications or the grant or variation of premises licences in the Wimbledon Town Centre CIZ. The authority considers that the number of licensed premises in Wimbledon Town Centre Cumulative Impact Area is such that is likely that granting further licences would be inconsistent with the authority’s duty to promote the licensing objectives. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, whilst large nightclubs or late night bars and public houses might add to the problems of cumulative impact, a small restaurant or theatre may not. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

16.1 Exceptions to Wimbledon Town Centre CIZ

- a. Premises that are not alcohol led and

- i. support the people visiting the area during the day; and/or
 - ii. support the wider cultural offering in the area
 - b. Premises that are not alcohol led and
 - i. support the people visiting the area during the day; and/or
 - ii. support the wider cultural offering in the area
 - c. Small premises that only intend to operate during daytime hours, e.g. those with a capacity of fifty persons or less who only intend to operate until 11pm.
 - d. Premises intending to open at night after 11pm, where:
 - (a) A comprehensive operating schedule is offered to demonstrate that there will be no negative cumulative impact and which offers a positive contribution to the Night Time Economy, which may include:
 - i. Providing safe spaces for people late at night.
 - ii. Providing a robust Dispersal Policy to ensure minimum disruption to residents, using staff and door security outside the premises, directing customers in an orderly manner away from the premises and remaining outside until all customers have left the vicinity.
 - iii. The adequacy of the applicant's proposals to prevent crime and disorder utilising CCTV and door supervisors as necessary.
 - iv. Providing robust staff training manuals and code of conduct to delivery drivers/riders for premises that are applying to primarily offer a delivery service, to minimise noise and disturbance.
 - v. Providing clear robust management plans for outdoor areas of licensed premises to reduce noise, odour, and smoke pollution to residents.
 - vi. A strong commitment to preventing violence against women and promoting women's safety at night, with steps to include and sufficient numbers of appropriately trained staff, and
 - vii. Robust steps are proposed to prevent vertical drinking with restaurant style conditions to restrict alcohol to be ancillary to the service of meals.
 - e. Instances where the applicant is applying for a new licence on substantially similar terms to a licence they have recently surrendered for a premises of comparable size in the cumulative impact policy area
- 16.2 Examples of factors we will not consider as exceptional include but are not limited to:
- a) that the premises will be well managed and run
 - b) that the premises will be constructed to a high standard
 - c) that the applicant operates similar premises elsewhere without
 - d) complaint

17. Mitcham Town Centre CIZ



Active licences within Mitcham Town Centre CIZ

Type	Number
Bar/Club/Pub	10
Restaurants	5
Convenience stores/supermarkets/off licence	47
Sports venue/open spaces	0
Takeaways/premises selling late night food only (no alcohol)	11

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

Total number of premises	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 02.00 hours	Terminal hour 02.01 – 03.00 hours	No restriction
62	39(63%)	12(19%)	8 (13%)	2 (3%)	1(2%)

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

Total number of premises	Terminal hour up to 01.00	Terminal hour 01.01- 02.00 hours	Terminal hour 02.01 – 03.00 hours	Terminal hour 03.01 hours – 05.00 hours
11	4	3	1	3

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

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

On 19/20 August 2015, a team of Youth Inspectors (YIs) walked the area covered by the then proposed Cumulative Impact Zone (CIZ) around Mitcham. They noted whether premises they passed sold alcohol or fast food, and the appearance of stores and streets, noting any antisocial behaviour or litter. The Youth Inspectors noted 165

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retail outlets in the Mitcham Cumulative Impact Zone area. Of these, 44 (27%) were places to buy food ingredients, 26 (16%) were fast food outlets, 3 (2%) were restaurants, 6 (4%) were cafes, 6 (4%) were pubs, 6 (4%) were betting shops and 2 (1%) were payday loan shops. The rest (72, 44%) were a mix of other uses, for example estate agents, hairdressers, garages.

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

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

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

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

In September 2023, the Head of Community Safety presented a report to the Overview and Scrutiny Commission which included information on street drinking delivery and Public Place Protection Order Enforcement. The report stated that in July 2023, the Council looked at available evidence, the results of a consultation with the public, Police and community representatives and an equalities impact assessment and implemented a borough wide PSPO to address alcohol related ASB. This included the PSPO which operated in five wards in the east of the borough (Cricket Green, Figges Marsh, Graveney, Lavender Fields and Ravensbury). The borough wide Order will be in place until July 2026. A summary of the Annual Residents Survey (last conducted in 2021) showed that residents in Mitcham saw being drunk or rowdy as a problem. Residents also expressed concerns about alcohol related ASB and street drinking.

In view of the continuing problem with street drinking around Mitcham Town Centre and in light of the actual and perceived problems associated with alcohol in the area it is proposed to retain the Mitcham Town Centre special policy on cumulative impact with no amendments to the area or to the type of premises to be included in the policy. In publishing this cumulative impact assessment the authority is setting down a strong statement of approach to considering applications or the grant or variation of “off-sales” premises licences in the Mitcham Town Centre CIZ. The authority considers that the number of “off-sales” premises licences in the Mitcham Town Centre CIZ is such that is likely that granting further licences would be inconsistent with the authority’s duty to promote the licensing objectives.

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

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

As stated above the current Cumulative Impact Assessment for Mitcham Town Centre only applies to applications for the off sales of alcohol, However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, alcohol ancillary to the main business activity e.g. florist providing champagne with flowers or cheese shop selling wine to accompany cheese. For this reason, applications for “off-sales” of alcohol with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

17.1 Exceptions to Mitcham Town Centre CIZ

- a) Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
 - i. Specialist premises selling alcohol ancillary to main activity of business e.g., florist providing champagne with flowers, cheese shop selling wine to accompany cheese.
 - ii. Premises that can demonstrate that the risk of alcohol purchased from the premises being consumed on the street is minimal due to the nature and type of alcohol being sold, which could include the following:
 - i. conditions restricting the sale of high strength alcohol, single cans and miniatures.
 - ii. conditions that no beer, lager, cider, ale or spirit mixers with an Alcohol By Volume (ABV) content of above 5.5% will be sold or offered for sale.

- iii. Instances where the applicant is applying for a new licence on substantially similar terms to a licence, they have recently surrendered for a premises of comparable size in the cumulative impact policy area
- 17.2 Examples of factors we will not consider as exceptional include but are not limited to:
- e) that the premises will be well managed and run
 - f) that the premises will be constructed to a high standard
 - g) that the applicant operates similar premises elsewhere without complaint