

COMMUNITY AND HOUSING DEPARTMENT

Simon Williams - Director



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

Direct Line: 020 8545 4834

Date: 11 December 2015

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

Re: Application for review of a Premises Licence under the Licensing Act 2003 – Ambaal Store, CR4 2AG

Application Reference	LN/000001460
Premises address	173 Streatham Road, Mitcham, CR4 2AG
Ward	Graveney
Summary of the application	Current License: Supply of alcohol off the premises, Monday to Saturday 08:00 - 23:00, Sunday 10:00-22:30 Review requested due to breach of a licence condition: Selling four cans of lager (abv 5.5%) at 23:35hrs which is outside of their licensed hours.

As a responsible authority under 2012 amendment to the Licensing Act 2003, Public Health Merton wishes to make representation to the application to review this licence on all four of the licensing objectives:

1. **The prevention of crime and disorder**
2. **Public safety**
3. **Prevention of public nuisance**
4. **The protection of children from harm**

Tackling alcohol misuse is central to achieving the outcomes in Merton's Health and Wellbeing Strategy: giving every child a healthy start in life, supporting people to improve their health, improving wellbeing, resilience and connectedness, and reducing the gap in life expectancy between the east and west of the borough. We want to create an environment and a culture in the borough that prevents problem drinking from starting and provides early help for people who are struggling. One of the ways we will be doing this is ensuring health and wellbeing considerations are presented for consideration in licensing decisions, in order to tackle alcohol-related crime and anti-social behaviour, ensure public safety and prevent harm to children.

The Merton Joint Strategic Needs Assessment (JSNA) chapter on alcohol sets out a summary of the available evidence on alcohol-related behaviours and consequences, as background to the importance of tackling alcohol effectively in the borough: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

Ambaal Store is located in the proposed Mitcham Cumulative Impact Zone (CIZ) which will come into force in January 2016, following the review of the borough's Statement of Licensing Policy in 2015. This new CIZ has been proposed due to recognition of the levels of alcohol-related harm in this area.

Evidence of detrimental impact on the licensing objectives:

1. The prevention of crime and disorder

Local data from the London Ambulance Service suggests that in the year to June 2015, the following incidents occurred within 500 meters of this postcode:

- 54 alcohol related incidents, 3 of which were under the age of 26
- 11 assaults
- 2 head injuries
- 3 least serious injuries, which are often used as a proxy for alcohol related violence

These incidents place the area in the top 30% in Merton for alcohol-related incidents.

This premises is in Graveney Ward which ranks 3rd in the borough for antisocial behaviour and sexual assaults. It also has the 5th highest level of alcohol related illness in over 18s compared to other wards in the borough.

While these incidents do not relate to this specific premise, the data presented above suggests an existing impact of alcohol consumption in the local area on levels of crime and disorder. Data sheets have been attached for the above data.

2. Public safety

- Premises is located in the proposed Mitcham CIZ, an area where it is recognised that there is already a problem with the impact of alcohol on public safety.
- The data on assaults, antisocial behaviour and violence above and in the Appendix paints a clear picture of the impact of alcohol consumption in this specific area on public safety. In addition, the recent Annual Residents Survey highlighted that nearly half of all residents in this area of the borough are very worried or fairly worried about people being drunk and rowdy (see Appendix).

3. Prevention of public nuisance

- Premises is located in the proposed Mitcham CIZ, an area where it is recognised that there is already a problem with the impact of alcohol on public nuisance
- The data on antisocial behaviour and theft above and in the Appendix paints a clear picture of the impact of alcohol consumption in this specific area on public nuisance. As above, the recent Annual Residents Survey highlighted that concern about people being drunk and rowdy is a concern in this area (Appendix).

4. Protection of children from harm

- In younger people, risky drinking behaviour is associated with anti-social behaviour and teenage conceptions.¹
- Young people are increasingly buying alcohol from friends or relatives, so implementation of laws preventing sales to minors does not necessarily reduce their access. Greater off-license density increases the general availability of alcohol in the home and through friends, family and from passers by.²
- The premises is located within 500 metres of 3 schools, and is in the top 5% of areas in the borough for schools within 300-400m.

Conclusion

We support the review of this license. We believe that adherence to the existing conditions placed on the license is important in limiting any adverse consequences of the license on the objectives of the prevention of crime and disorder, public safety, the prevention of public nuisance and the prevention of harm to children.

With this in mind, and considering the impact that alcohol has on the nearby area, the new Mitcham CIZ coming into force in January 2016, and the infringement of current licensing conditions by the license holder, we would recommend revoking the current license for Ambaal Stores.

Yours sincerely,

Rebecca Spencer
Health Improvement Officer

On behalf of Public Health Merton

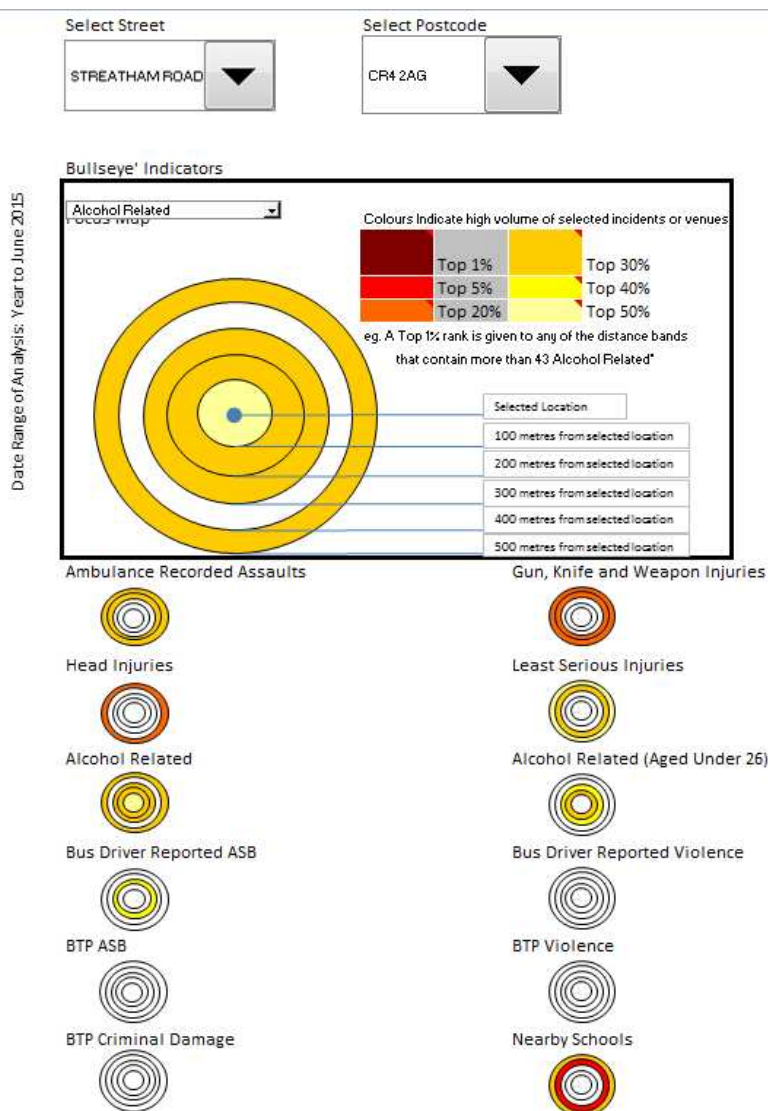
¹ Merton JSNA: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

² Alcohol Concern, One On Every Corner; http://www.alcoholconcern.org.uk/wp-content/uploads/woocommerce_uploads/2014/12/one-on-every-corner.pdf

LBM Public Health preliminary data scan for the following premises:

Ambaal Store, 173 Streatham Road, Mitcham, CR4 2AG

A. SafeStats bullseye dashboard for Streatham Road, CR4 2AG:



Headlines related to postcode: BULLSEYE DATA (this page):

- 51 alcohol related incidents within 500m of this postcode in the year to June 2015; 3 alcohol related incidents in those aged under 26 years old.
- Within 500m of the postcode: incidents of head injuries – 2 in the year to June 2015 (top 20% rank in the borough).

TRAFFIC LIGHT DATA (PTO):

- Graveney Ward is ranked 5th out of 20 wards in Merton for alcohol illness treated by London Ambulance service in those aged 18+, and 3rd out of 20 wards for sexual assaults.

Type of data (incidents) <i>in the year to June 2015</i>	Total within 500m
Ambulance recorded assaults	11
Gun, Knife and Weapons injuries	2
Head injuries	2
Least serious injuries	3
Alcohol related	51
Alcohol related (aged under 26)	3
Bus driver reported ASB	1

Bus driver reported Violence	0
BTP ASB	0
BTP Violence	0
BTP Criminal Damage	0
Nearby schools	3

B. SafeStats traffic light dashboard for postcode CR4 2AG:

[SELECT POSTCODE FROM LIST](#) WARD: **CR4 2AG** WARD NAME: **Graveney**
[CLICK HERE>](#) 00BAGD:

PREVENTION OF CRIME AND DISORDER	
AMBULANCE DATA	
RANK ALL ASSAULTS 10 out of 20 wards	RANK SEXUAL ASSAULTS 3 out of 20 wards
RANK ALL WEAPON INJURIES 6 out of 20 wards	RANK KNIFE INJURY 6 out of 20 wards
RANK GUN INJURIES 1 out of 20 wards	RANK VIOLENCE AGAINST AMBULANCE CREW 11 out of 20 wards

POLICE DATA: recorded crime and ASB	
RANK ALL VIOLENCE 11 out of 20 wards	RANK RAPE 10 out of 20 wards
RANK THEFT FROM PERSON (OTHER) 7 out of 20 wards	RANK PERSONAL ROBBERY 1 out of 20 wards
RANK CRIMINAL DAMAGE 10 out of 20 wards	RANK POSSESSION OF DRUGS 12 out of 20 wards
MPS ASB RANK 3 out of 20 wards	MPS POSSESSION OF WEAPON 6 out of 20 wards

Other data sources	
NIGHT TIME VIOLENT DISORDER 15 out of 20 wards	DELIBERATE FIRES 19 out of 20 wards
Probation Clients with Alcohol misuse Risk 5 out of 20 wards	Probation Clients Alcohol Risk and High risk of causing harm 18 out of 20 wards

ALCOHOL ILLNESS TREATED BY LONDON AMBULANCE SERVICE		
ambulance data		
AGED 8 - 17 12 out of 20 wards	AGED 18 - 25 7 out of 20 wards	
AGED 26 - 39 4 out of 20 wards	AGED 8 - 39 4 out of 20 wards	AGED 18+ 5 out of 20 wards

DEPRIVATION	
ward summaries	
INCOME DEPRIVATION 9 out of 20 wards	EMPLOYMENT DEPRIVATION 10 out of 20 wards
AVERAGE DEPRIVATION 9 out of 20 wards	RANK BY MOST DEPRIVED SUB WARD AREA 11 out of 20 wards

<http://data.london.gov.uk/datastore/package/indices-deprivation-2010>

PUBLIC TRANSPORT ALCOHOL RELATED INCIDENTS	
BTP DRUNKEN BEHAVIOUR 4 out of 20 wards	TFL ALCOHOL RELATED DISTURBANCE 15 out of 20 wards

WELL BEING	
15	RANK Life Expectancy
11	RANK Incapacity claimant rate -index
6	RANK Crime rate - Index
13	RANK Average Capped GCSE and Equivalent Point Score Per Pupil
11	RANK Unauthorised Absence in All Schools (%)
10	RANK Dependent children in out-of-work families
13	RANK Public Transport Accessibility
3	RANK Homes with access to open space & nature, and % greenspace
5	RANK Subjective well-being average score

<http://data.london.gov.uk/datastore/package/london-ward-well-being-scores>

APPENDIX 2: Public Health data on alcohol in Merton & Graveney ward (premises location):

Nationally, alcohol is the leading risk factor for preventable death in 15-49 year olds. Nine million adults now drink at levels that increase the risk of harm, of whom 1.6 million show signs of alcohol dependence. The number of people dying due to liver disease in England is rising, in contrast to other major causes of disease that have been declining.³ The harm of alcohol falls not just on individuals and their health, but on society as a whole. Alcohol misuse is associated with a wide range of criminal offences, including drink driving, being drunk and disorderly, criminal damage, assault and domestic violence, all of which can also indirectly impact on health. In younger people, risky drinking behaviour is associated with anti-social behaviour and teenage conceptions.

The estimated prevalence of binge drinking is 13.8% compared with 14.3% in London and 20.0% nationally. However, this masks differences across the borough. Estimated levels of the adult population drinking at 'increasing risk' (21%) and 'higher risk' (7.2%) are above London average, and again, drinking patterns vary across the borough.

In terms of alcohol harm overall, in 2012 Merton ranked 55 out of 326 local authorities (Local Alcohol Profiles for England, LAPE 2012) but was in the higher percentiles for:

- Male mortality chronic liver disease (104/326)
- Female alcohol-specific hospital admissions (106/326)
- Male alcohol-specific hospital admissions (109/326)
- Male alcohol-attributable hospital admissions (151/326)
- Alcohol-related violent crimes (192/326)
- Alcohol-related sexual offences (208/326).

The amount of harm caused by alcohol also varies across the borough.

Figure 1: Residents reporting drinking alcohol every day

Expected Prevalence of Alcohol Consumption at Home in Merton by Ward: Once a Day or More.

Source: Experian Grand Index 2014

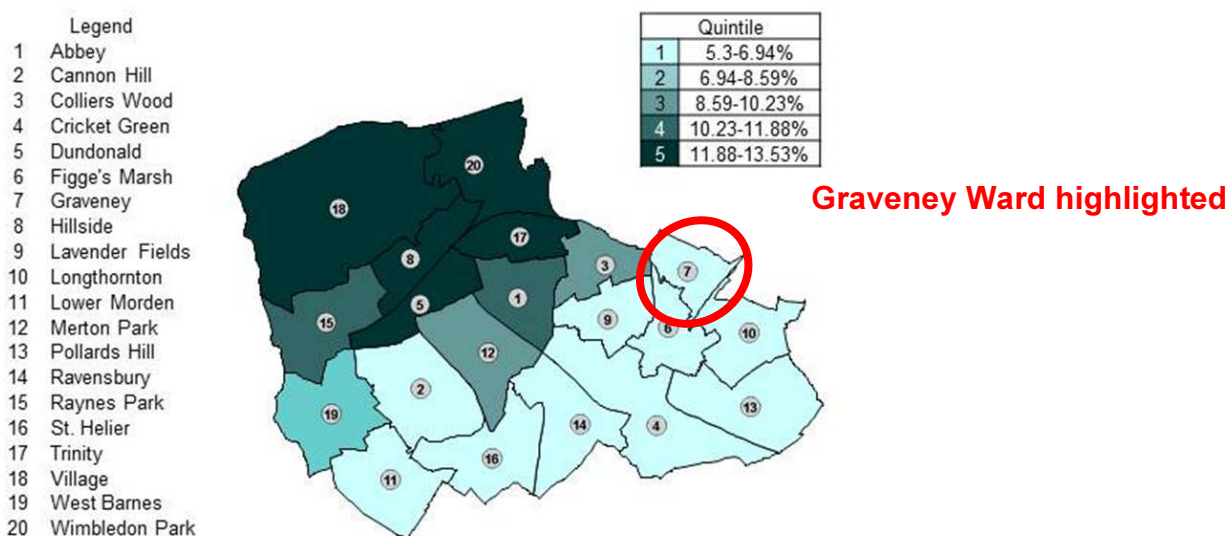
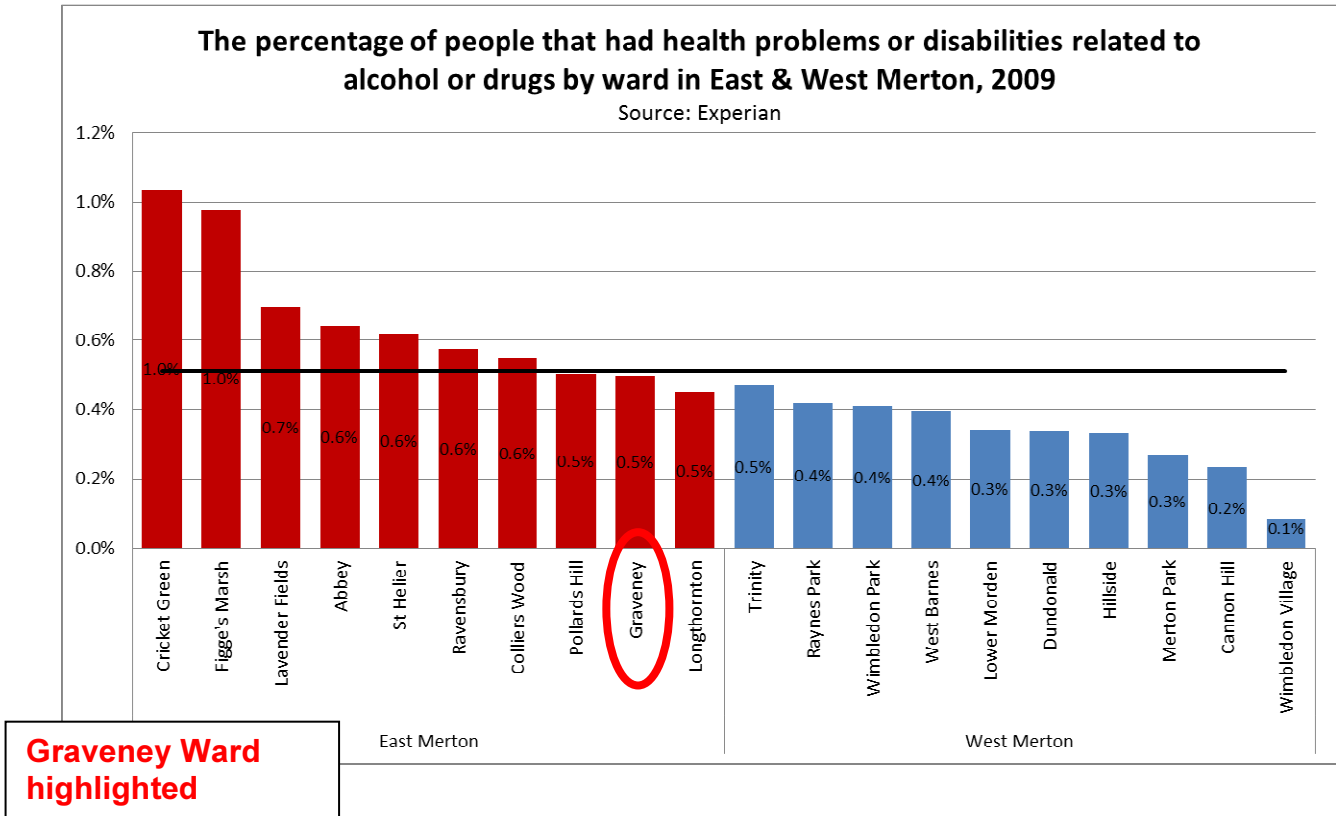


Figure 2: Residents with health problems or disabilities caused by alcohol or drugs

³ PHE (2014) From evidence into action: opportunities to protect and improve the nation's health



In terms of all alcohol-related crime, Merton with a rate of 7.3 recorded crimes per 1,000 populations was higher than the neighbouring boroughs Sutton (6.7) and Kingston (6.7) and the England average of 7 but lower than the London average of 11.1 (LAPE 2012). See Figure 2. Figure 3 shows that the trend has generally been downward.

Figure 3: Recorded crime attributable to alcohol, Merton compared with South West London, London overall, England, 2011-12.

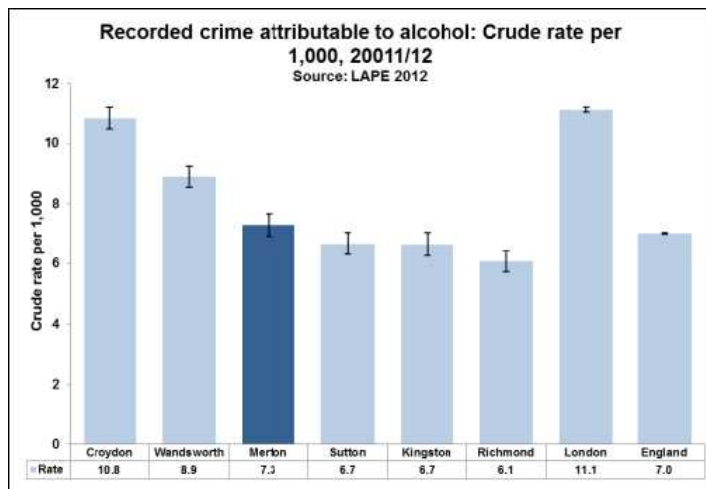
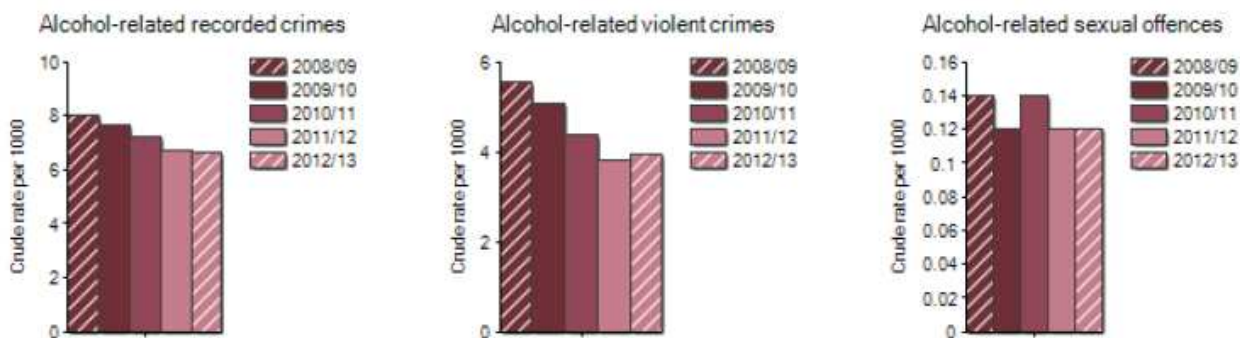
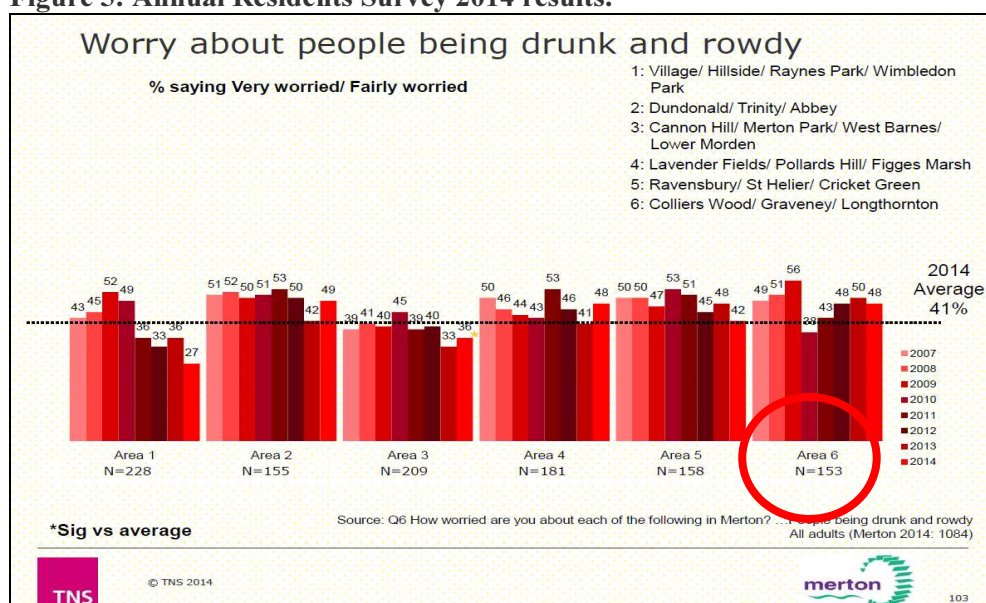


Figure 4: Alcohol-related crimes in Merton, 2008-09 to 2012-13.



However, the 2014 Annual Residents Survey highlighted that residents are still concerned about crime, anti-social behaviour and people being drunk and rowdy – see Figure 4:

Figure 5: Annual Residents Survey 2014 results.



Area which includes Graveney Ward is highlighted: in 2014 an above average number (48%) of local residents are very worried or fairly worried about people being drunk and rowdy.

For more information see the Merton Joint Strategic Needs Assessment (JSNA) chapter on alcohol: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

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