

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: 20 October 2015

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

Re: Public Health response to application for a Premises Licence under the Licensing Act 2003- Mitcham News, 25 Upper Green East, Mitcham, CR4 2PE

Application Ref	WK/201504285
Applicant	Navinchandra Patel
Premises address	25 Upper Green East
Ward	Figge's Marsh
Summary of the application	Newsagents. New off-licence application Monday – Sat 0530-2300 Sun 0630-2200

As a responsible authority under 2012 amendment to the Licensing Act 2003, the Director of Public Health for Merton wishes to make representation to the application on two of the four licensing objectives:

- 1. The prevention of crime and disorder**
- 2. Public safety**
- 3. Prevention of public nuisance**

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>

1. The prevention of crime and disorder

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

- 112 alcohol related incidents, 19 of which were in those under the age of 26
- 46 assaults
- 8 head injuries
- 20 least serious injuries, which are often used as a proxy for alcohol related violence

This data suggests an existing significant impact of alcohol consumption in the local area. While the above data does not relate to these specific premises, it is likely that the granting of this variation as requested, particularly the increase in hours where alcohol will be sold, will contribute to the above trends relating alcohol to crime and disorder.

National and international scientific evidence shows the following:

- Overall, more alcohol is consumed when it is easily available.¹
- An increase in alcohol sales is strongly linked to an increase in drinking-related damage, for instance injuries and assaults.²
- Harmful use of alcohol is a major contributor to violence: alcohol use commonly precedes aggressive behaviour, and harmful drinking is associated with being both a perpetrator and a victim of violence³
- Reducing the availability of alcohol through regulating sales outlets, hours and prices can substantially decrease violence.⁴

2. Public Safety and

3. Prevention of public nuisance

Mitcham News is located within the proposed Mitcham cumulative impact zone, an area where it is recognised that there is already a problem with the impact of alcohol on public safety and public nuisance. The data above on assaults and violence above and in Appendix 1 paints a picture of the impact of alcohol consumption in this specific area on both public safety and nuisance.

4. The protection of children from harm

¹ Alcohol Concern UK (2012) Response to The Government's Alcohol Strategy (March 2012)

² Popova et al 2009, Hours and days of sale and density of alcohol outlets: impacts on alcohol consumption and damage: a systematic review. *Alcohol & Alcoholism* Vo. 44, No. 5, pp. 500-516

³ WHO 2009 Preventing violence by reducing the availability and harmful use of alcohol

⁴ WHO 2009 Preventing violence by reducing the availability and harmful use of alcohol

In younger people, risky drinking behaviour is associated with anti-social behaviour and teenage conceptions⁵.

Mitcham News is located within 500 metres of 3 schools, and is in the top 1% of areas in the borough for schools within 300m.

Conclusion

The premises above is situated within the proposed Mitcham Cumulative Impact Zone, an area where there is evidence of a high amount of alcohol-related harm. The applicant states a number of steps they will take to promote the licensing objectives; however we believe that these will not be sufficient to prevent an additional impact of the proposed license for sale of alcohol on the levels of alcohol-related crime and disorder and issues around public safety already seen in the area.

Therefore we would recommend that the Committee reject the application for an off-licence on these premises.

If the Committee approves the license, we would recommend that the Committee restricts the license operating hours to between 11am and 11pm daily, rather from 5.30am to 11pm Monday to Saturday and 6.30am to 10pm Sunday as requested.

We would also recommend that if the Committee approves the application, the following conditions are applied to the licence to further promote the prevention of crime and disorder and to promote public safety:

1. No super-strength beer, lagers or ciders, or spirit mixtures above 5.5% ABV (alcohol by volume) or above shall be sold at the premises.
2. No single cans or bottles of beer, lager cider or spirit mixtures shall be sold at the premises.
3. No more than 15% of the sales area shall be used at any one time for the sale, exposure for sale, or display of alcohol.
4. There shall be no promotional sales of alcohol at the premises where alcohol is sold at a price lower than that at which the same or similar alcoholic drinks are sold, or usually sold, on the premises.
5. No advertising of alcohol drinks or drink promotions visible from the street.
6. CCTV should be installed, monitored and where required made available to Police and other legal authorities, and staff operating the CCTV system must be fully trained and familiar with responsibilities and legal requirements in respect of operating such a system.

⁵ Merton JSNA: <http://www.merton.gov.uk/health-social-care/publichealth/jsna/lifestyle-risk-factors/adults-substance-misuse/alcohol-jsna.htm>

Yours sincerely,

Dr Eleanor Curtis
Specialty Registrar in Public Health

On behalf of Dr Kay Eilbert, Director of Public Health

Appendix 1

Merton: Cumulative Impact Analysis Tool: Proximity Analysis

Select Street

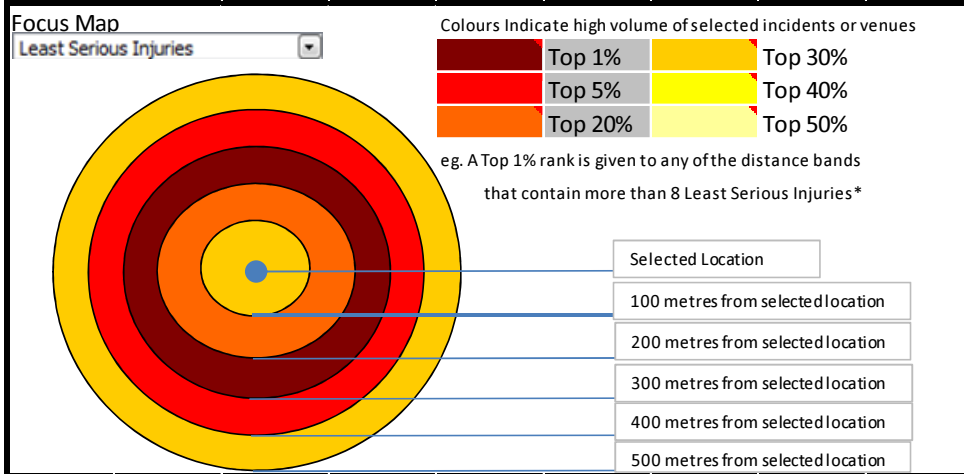
UPPER GREEN EAST

Select Postcode

CR4 2PE

Date Range of Analysis: Year to June 2015

Bullseye' Indicators



Ambulance Recorded Assaults



Gun, Knife and Weapon Injuries



Head Injuries



Least Serious Injuries



Alcohol Related



Alcohol Related (Aged Under 26)



Bus Driver Reported ASB



Bus Driver Reported Violence



BTP ASB



BTP Violence



BTP Criminal Damage



Nearby Schools



Mock up data

On licenses



Off licenses



Both On and Off



All Licensed Premises



