



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: Re: Application for review of a Premises Licence under the Licensing Act 2003 – S & M Food and Wines, CR4 3NH

Application Reference	LN/000000974
Premises address	227 London Road, Mitcham, CR4 3NH
Ward	Cricket Green
Summary of the application	<p>Current License: Supply of alcohol off the premises, Monday to Saturday 08:00 - 23:00, Sunday 10:00-22:30</p> <p>Review requested due to breach of a licence condition: Selling two cans of lager (abv 9%) at 00:00hrs which is outside of their licensed hours.</p>

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>

S&M Food and Wines 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:

- 108 alcohol related incidents, 21 of which were under the age of 26
- 46 assaults
- 8 head injuries
- 21 least serious injuries, which are often used as a proxy for alcohol related violence

In addition there were also 80 bus driver reported anti social behaviour incidents within 500 meters of the proposed premises.

S & M Food and Wines is located in Cricket Green, an area where the data shows that there are high levels of crime and alcohol related harm. It is the ward with the highest level of deprivation in Morden, and also has the highest levels of alcohol related harm in 8-17 and 18-25 year olds. It ranks highest in the borough for sexual assault, anti-social behaviour and criminal damage, and second in the borough for assaults and all violence.

While these incidents do not relate to this specific premises, 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 conceptions¹.
- 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-licence density increases the general availability of alcohol in the home and through friends, family and from passers-by²
- As highlighted above, Cricket Green has the highest rates of alcohol related illness in 8-17 year olds compared to all other wards in the borough.
- The premises is located within 500 metres of 8 schools, and is in the top 1% of areas in the borough for schools within 300-500m.

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, considering the large impact that alcohol has on the local 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 S & M Food and Wine.

Yours sincerely,

Rebecca Spencer

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

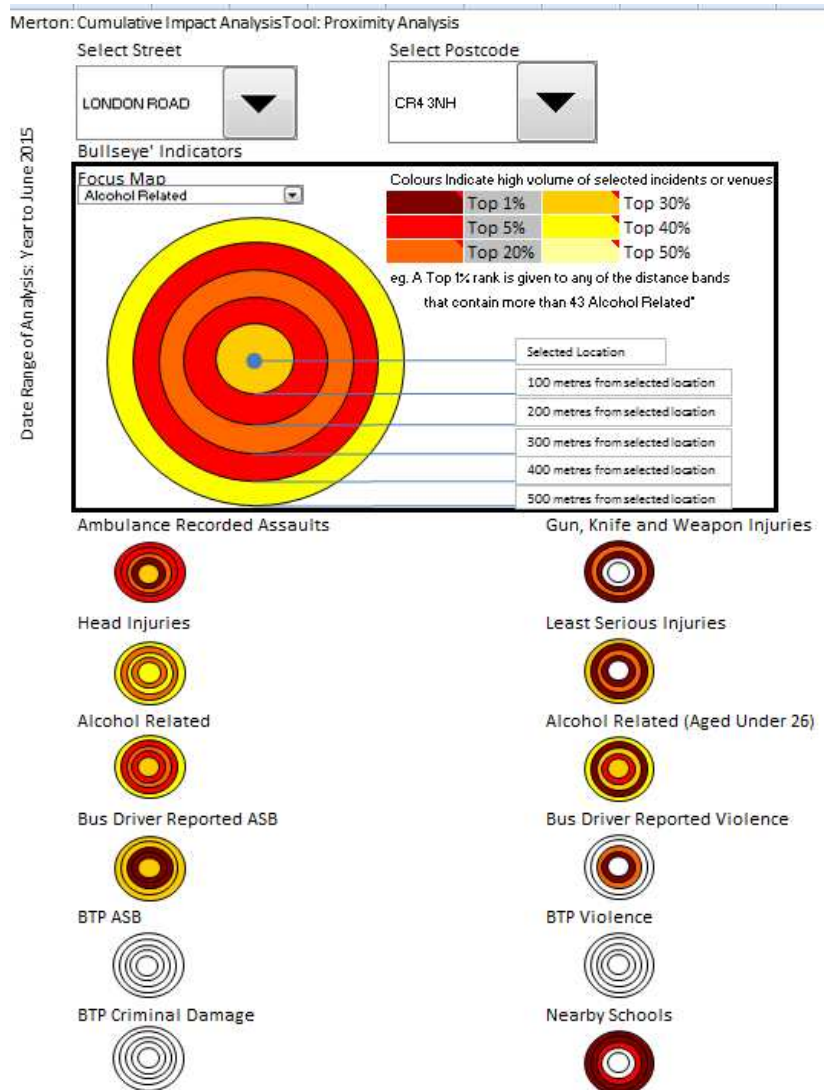
Health Improvement Officer

On behalf of Public Health Merton

LBM Public Health preliminary data scan for the following premises:

S & M Food and Wines, 227 London Road, Mitcham, CR4 3NH.

A. SafeStats bullseye dashboard for London Road, CR4 3NH:



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

- 108 alcohol related incidents within 500m of this postcode in the year to June 2015; 21 alcohol related incidents in those aged under 26 years old.
- Within 200m of the postcode: particularly high volume of alcohol-related incidents in those under 26 years old (top 5% rank in the borough).
- Within 200m of the postcode: particularly high volume of head injuries – 8 in the year to June 2015 (top 20% rank in the borough).

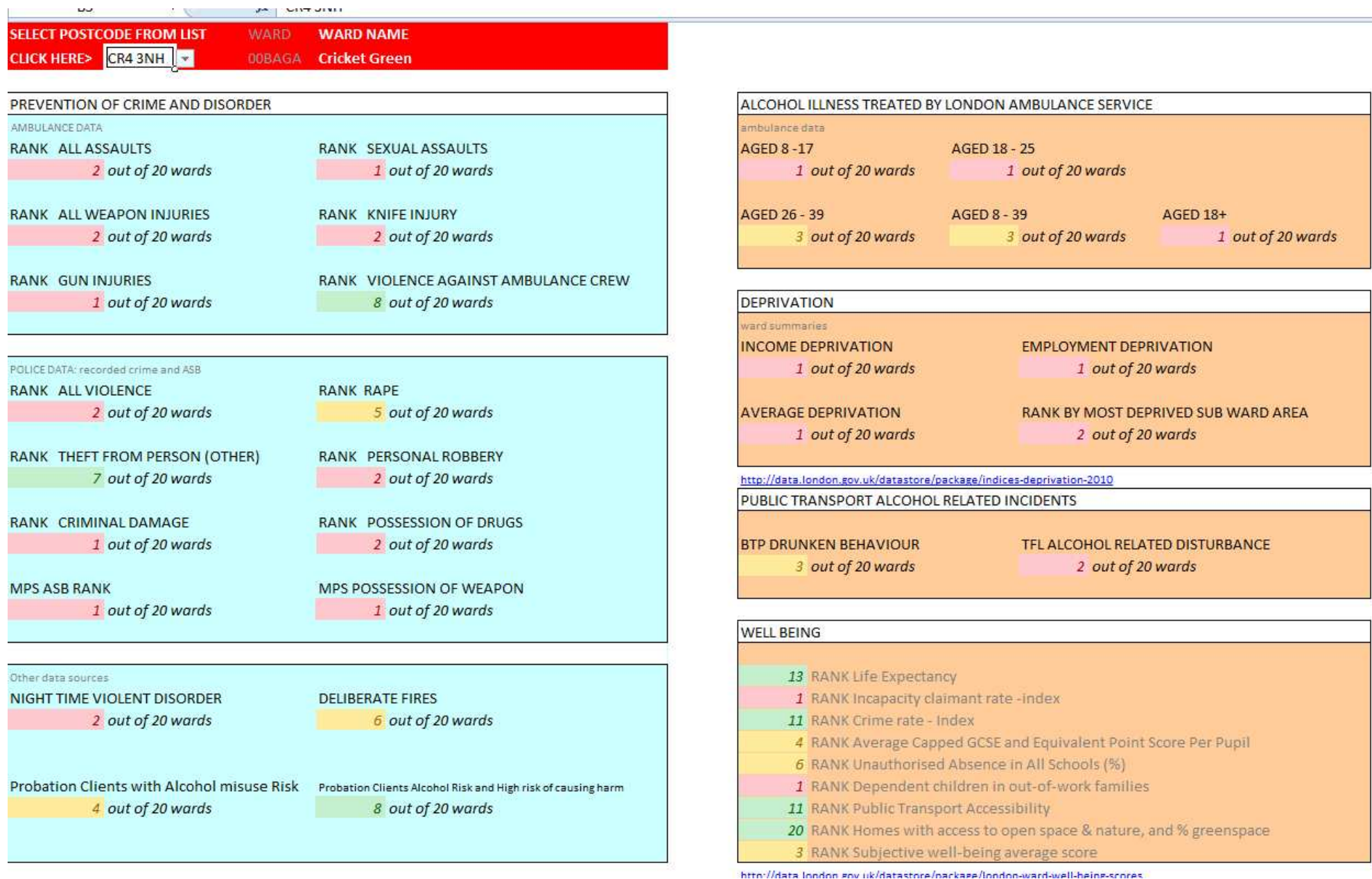
TRAFFIC LIGHT DATA (PTO):

- Cricket Green is ranked 1st out of 20 wards in Merton for alcohol illness treated by London Ambulance service in those aged 18-25 years old, and 2nd out of 20 wards for assaults, including sexual assaults.

Type of data (incidents) <i>in the year to September 2014</i>	Total within 500m
Ambulance recorded assaults	46
Gun, Knife and Weapons injuries	5
Head injuries	8
Least serious injuries	21
Alcohol related	108
Alcohol related (aged under 26)	21
Bus driver reported ASB	80
Bus driver reported Violence	3

BTP ASB	0
BTP Violence	0
BTP Criminal Damage	0
Nearby schools	8

B. SafeStats traffic light dashboard for postcode CR4 3NH:



APPENDIX 2: Public Health data on alcohol in Merton & Cricket Green (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:

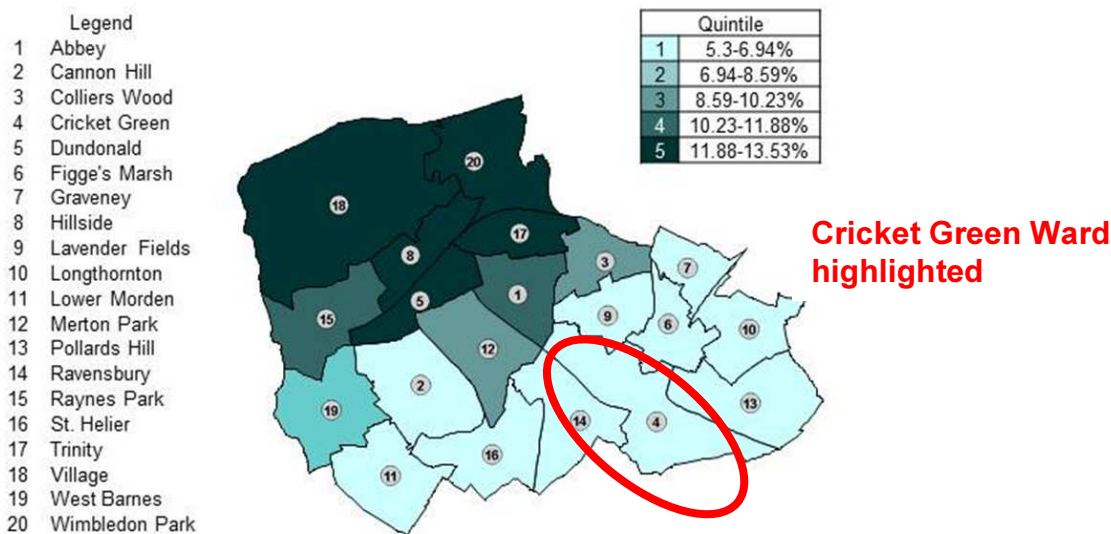
- Male mortality chronic liver disease (104/326)
- Female alcohol-specific hospital admissions (106/326)
- Male alcohol-specific hospital admissions (109/326)
- Male alcohol-attributable hospital admissions (151/326)
- Alcohol-related violent crimes (192/326)
- Alcohol-related sexual offences (208/326).

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

Figure 1: Residents reporting drinking alcohol every day

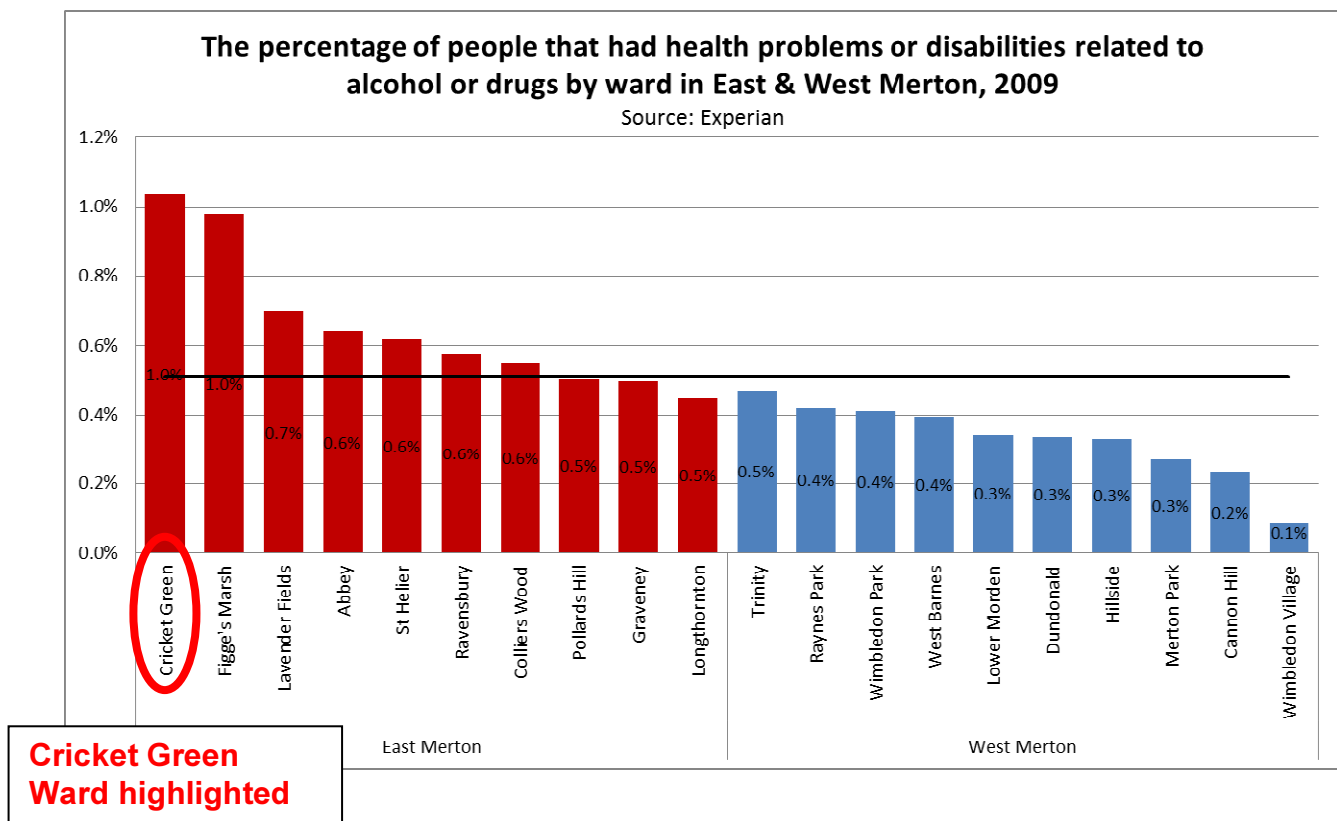
Expected Prevalence of Alcohol Consumption at Home in Merton by Ward: Once a Day or More.

Source: Experian Grand Index 2014



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

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



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.

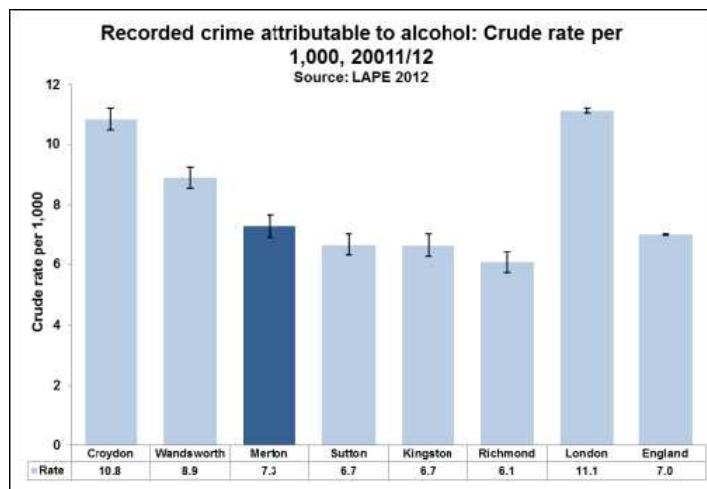
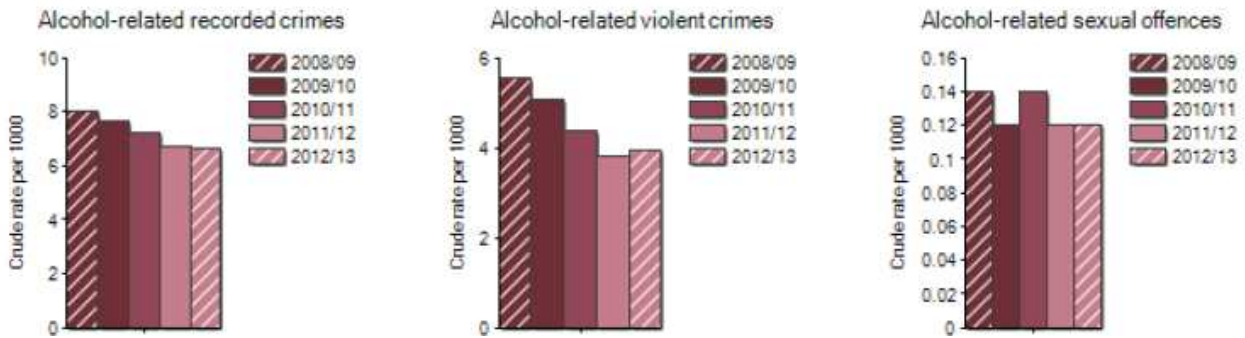
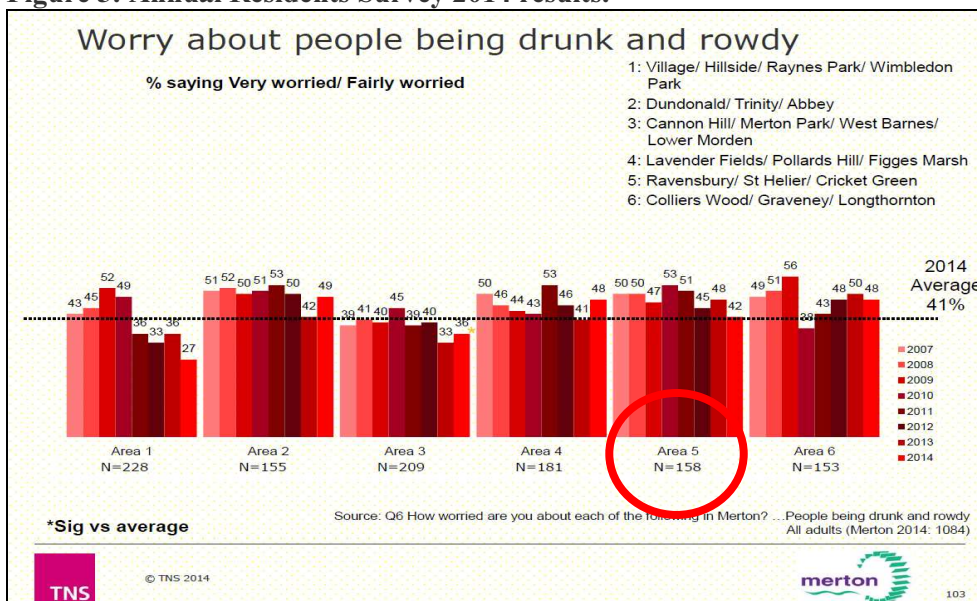


Figure 4: Alcohol-related crimes in Merton, 2008-09 to 2012-13.



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 Cricket Green Ward is highlighted: in 2014 an above average number (42%) 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>