

## 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:** 22<sup>nd</sup> Dec 2015

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

### Re: Application for a new Premises Licence under the Licensing Act 2003 – Eastern European Food

Application number	WK/201509183
Applicant	DG E GD Ltd
Premises address	51 London Road, Tooting, London, SW17 9JR
Ward	Graveney
Summary of the application	<b>New off-licence:</b> Hours of sale: Monday – Sun 0800-2300

As a responsible authority under 2012 amendment to the Licensing Act 2003, Public Health Merton wishes to make representation to the application on all four of the four 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>

These premises are located in the proposed Mitcham CIZ, an area where there is a known level of alcohol related harm.

Although steps that the applicant plans to take to promote the licensing objectives are given in the application, in our opinion there are not sufficient measures suggested to mitigate the recognised problems within the vicinity, particularly given the request for off sales.

### **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 October 2015, the following incidents occurred within 500 meters of this postcode:

- 32 alcohol related incidents, 5 of which were under the age of 26
- 8 assaults
- 4 least serious injuries, which are often used as a proxy for alcohol related violence

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 (Appendix 2).

National and international scientific evidence shows the following:

- Overall, more alcohol is consumed when it is easily available.<sup>1</sup>
- An increase in alcohol sales is strongly linked to an increase in drinking-related damage, for instance injuries and assaults.<sup>2</sup>
- 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 violence<sup>3</sup>
- Reducing the availability of alcohol through regulating sales outlets, hours and prices can substantially decrease violence.<sup>4</sup>

#### **2. Public safety and**

#### **3. Prevention of public nuisance**

These premises are located in Graveney Ward, which ranks 2<sup>nd</sup> of all wards in Merton for antisocial behaviour, and 3<sup>rd</sup> for drunken behaviour reported by the British Transport Police.

In the year to October 2015, there were 17 recorded episodes of bus driver reported antisocial behaviour within 500m of the postcode of these premises.

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<sup>1</sup> Alcohol Concern UK (2012) Response to The Government's Alcohol Strategy (March 2012)

<sup>2</sup> 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 Vol. 44, No. 5, pp. 500-516

<sup>3</sup> WHO 2009 Preventing violence by reducing the availability and harmful use of alcohol

<sup>4</sup> WHO 2009 Preventing violence by reducing the availability and harmful use of alcohol

These premises are 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 and nuisance.

The data on antisocial behaviour above and in the Appendix paints a clear picture of the impact of alcohol consumption in this specific area .

#### **4. The protection of children from harm**

In younger people, risky drinking behaviour is associated with anti-social behaviour and teenage conceptions<sup>5</sup> .

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-by<sup>6</sup>

The premises is located within 500 metres of 3 schools.

#### **Conclusion**

The premises are located within the proposed Mitcham CIZ, an area where there is already a known level 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 new licence on the levels of alcohol-related crime and disorder and issues around public safety already seen in the area.

**RECOMMENDATION: 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.**

**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. Minimum unit pricing of 50p per unit for all alcohol sold.

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

<sup>6</sup> Alcohol Concern, One On Every Corner; [http://www.alcoholconcern.org.uk/wp-content/uploads/woocommerce\\_uploads/2014/12/one-on-every-corner.pdf](http://www.alcoholconcern.org.uk/wp-content/uploads/woocommerce_uploads/2014/12/one-on-every-corner.pdf)

4. 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.
5. 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.
6. No advertising of alcohol drinks or drink promotions visible from the street.
7. 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.

Yours sincerely,

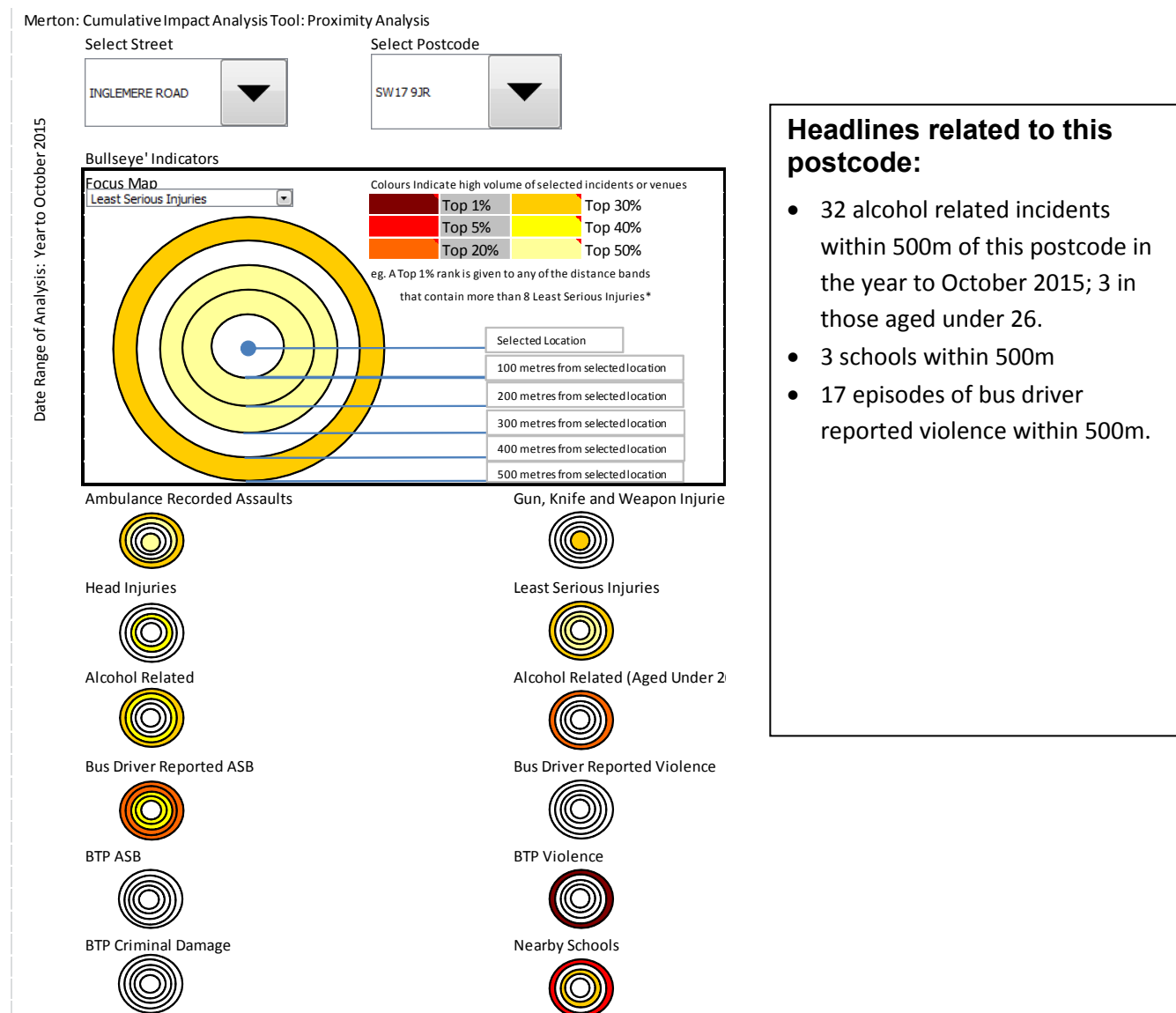
Dr Eleanor Curtis  
Public Health Registrar

On behalf of Merton Public Health team

## Appendix 1: LBM Public Health preliminary data scan for the following premises:

### Eastern European Food

#### A. SafeStats bullseye dashboard for Inglemere Road, SW17 9JR<sup>##</sup>:



Type of data (incidents)	Total within 500m
Ambulance recorded assaults	8
Gun, Knife and Weapons injuries	1
Head injuries	1
Least serious injuries	4
Alcohol related	32
Alcohol related (aged under 26)	3
Bus driver reported ASB	17
Bus driver reported Violence	0
Nearby schools	3

\* in the year to October 2015

<sup>##</sup> Street name used is different from address- Bullseye data did not recognise postcode and street combination. Inglemere Road is nearby street very close to premises, postcode is the same.

## B. SafeStats traffic light dashboard for postcode

### USER INPUT

SELECT POSTCODE FROM LIST

WARD

WARD NAME

CLICK HERE>

SW17 9JR

00BAGD

Graveney

### PREVENTION OF CRIME AND DISORDER

#### AMBULANCE DATA

RANK ALL ASSAULTS  
11 out of 20 wards

RANK SEXUAL ASSAULTS  
7 out of 20 wards

RANK ALL WEAPON INJURIES  
7 out of 20 wards

RANK KNIFE INJURY  
5 out of 20 wards

RANK GUN INJURIES  
1 out of 20 wards

RANK VIOLENCE AGAINST AMBULANCE CREW  
12 out of 20 wards

#### POLICE DATA: recorded crime and ASB

RANK ALL VIOLENCE  
11 out of 20 wards

RANK RAPE  
6 out of 20 wards

RANK THEFT FROM PERSON (OTHER)  
8 out of 20 wards

RANK PERSONAL ROBBERY  
4 out of 20 wards

RANK CRIMINAL DAMAGE  
13 out of 20 wards

RANK POSSESSION OF DRUGS  
10 out of 20 wards

MPS ASB RANK  
2 out of 20 wards

MPS POSSESSION OF WEAPON  
6 out of 20 wards

#### Other data sources

NIGHT TIME VIOLENT DISORDER  
14 out of 20 wards

DELIBERATE FIRES  
19 out of 20 wards

Probation Clients with Alcohol misuse Risk  
9 out of 20 wards

Probation Clients Alcohol Risk and High risk of causing harm  
1 out of 20 wards

MERTON 'Traffic Light Dashboard' to: October 2015

### ALCOHOL ILLNESS TREATED BY LONDON AMBULANCE SERVICE

#### ambulance data

AGED 8 - 17  
16 out of 20 wards

AGED 18 - 25  
7 out of 20 wards

AGED 26 - 39  
9 out of 20 wards

AGED 8 - 39  
9 out of 20 wards

AGED 18+  
16 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  
3 out of 20 wards

TFL ALCOHOL RELATED DISTURBANCE  
12 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.<sup>8</sup> 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:

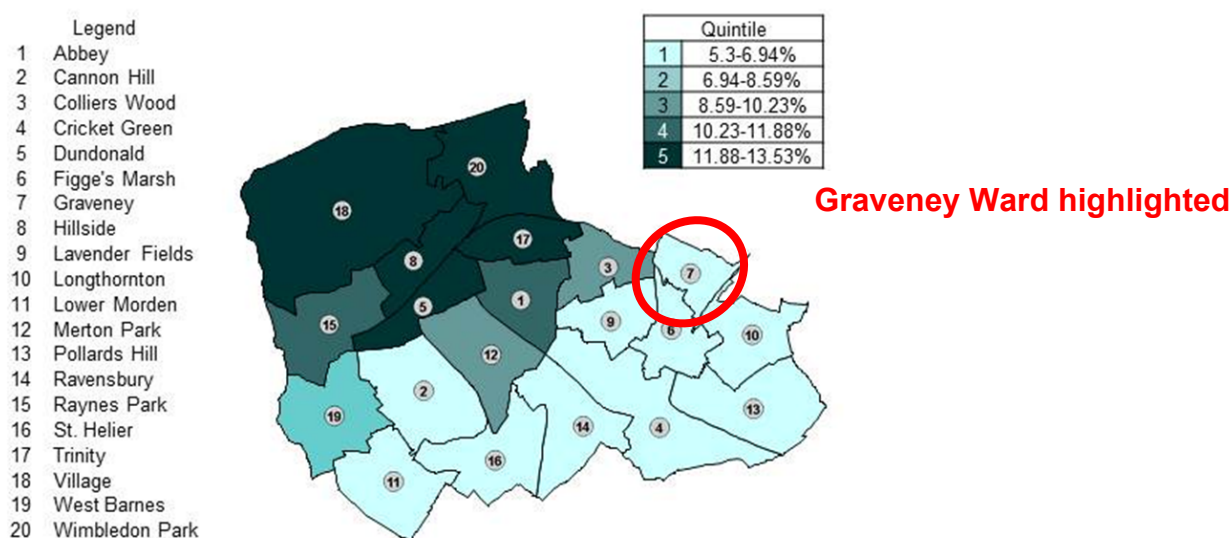
- Male mortality chronic liver disease (104/326)
- Female alcohol-specific hospital admissions (106/326)
- Male alcohol-specific hospital admissions (109/326)
- Male alcohol-attributable hospital admissions (151/326)
- Alcohol-related violent crimes (192/326)
- Alcohol-related sexual offences (208/326).

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

**Figure 1: Residents reporting drinking alcohol every day**

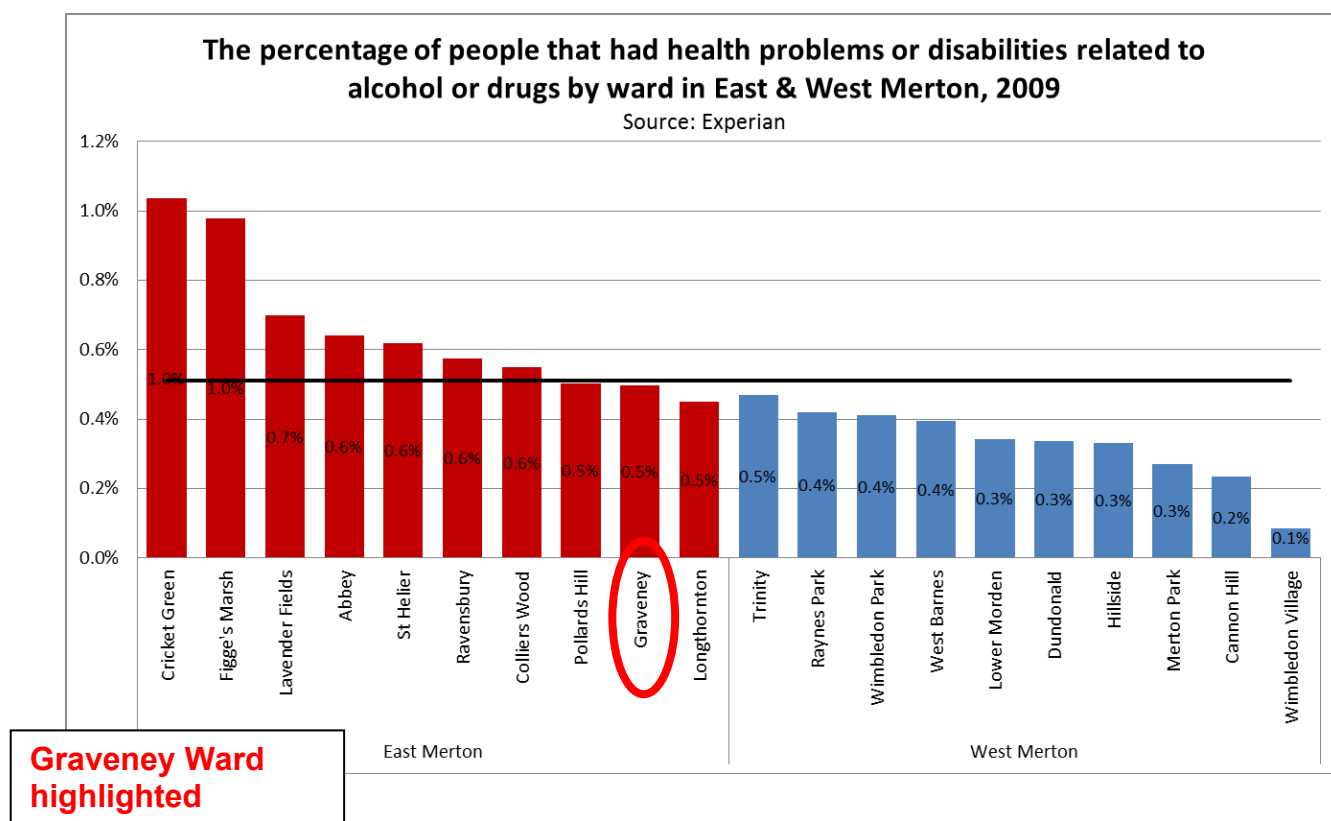
### Expected Prevalence of Alcohol Consumption at Home in Merton by Ward: Once a Day or More.

Source: Experian Grand Index 2014



<sup>8</sup> 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.**

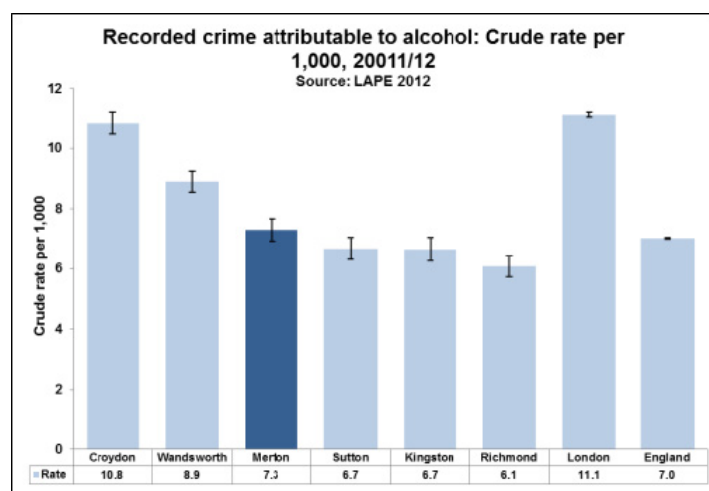
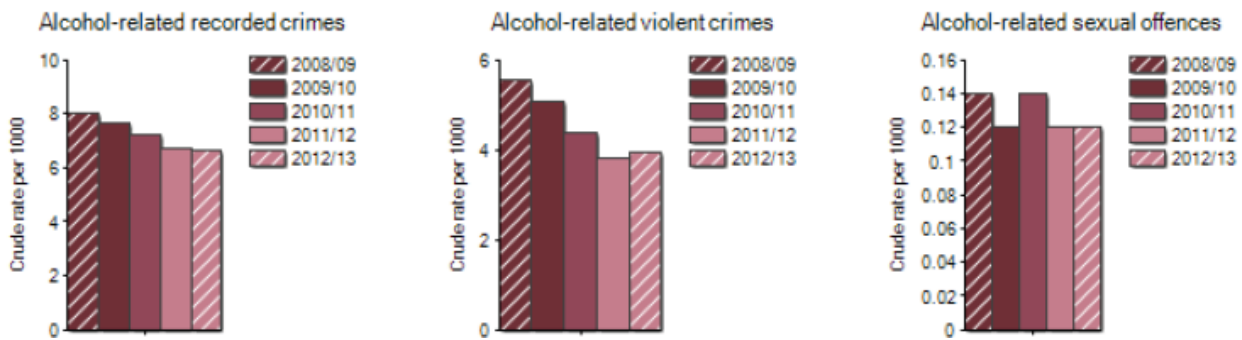


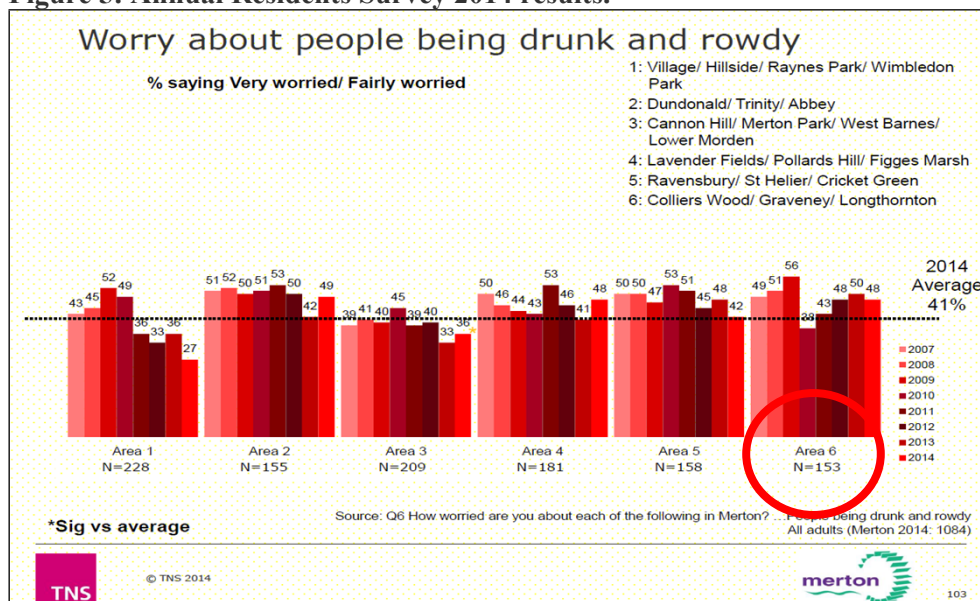


Figure 4: Alcohol-related crimes in Merton, 2008-09 to 2012-13.



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 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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