

**COMMUNITY AND HOUSING DEPARTMENT**

Department of Public Health

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

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

*Direct Line:* 020 8545 4834

*Date:* 20/09/2017

**Re: In support of a Metropolitan Police review of a premises license under Section 51 of the Licensing Act 2003**

**Sleeico Ltd, 288 London Road, Mitcham, CR4 3NB.**

License Number	LN/000002093
Name of Premise License Holder	Kandiah Arasalingam
License Type	Off-License
Ward	Cricket Green

As a responsible authority under the 2012 amendment to the Licensing Act 2003, the Director of Public Health for Merton wishes to support the review submitted by the Metropolitan Police for this premises license, on all 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**

Public Health is requesting this license review for the following reasons:

- Evidence of irresponsible trade and breaching of licensing objectives
- Public health data shows some areas for concern within the premises postal code.

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.

Public Health strives to create an environment and a culture in the borough that prevents problematic drinking from early on, and provides early help for those who require it.

A crucial element of tackling alcohol-related harm is ensuring that health and wellbeing considerations are met by premises licensed to sell alcohol within the borough, in order to prevent 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>.

## **Evidence of detrimental impact on the licensing objectives**

### **1. The prevention of crime and disorder**

The link between alcohol and violence has been recognized as far back as the 4th century BC. Alcohol-related violence causes substantial injury and death.<sup>1</sup>

Local data reveals that in the year August 2015 to October 2016, the following incidents of concern occurred within the vicinity of the premises' postcode:

- Ambulance-recorded assaults within 200m of the premises post code fall in the top 30% for the borough.
- Figures for gun, knife and weapon injuries within 200m of the premises postcode fall in the top 30% for the borough.
- Bus-driver reported violence within 300m of the premise postcode falls in the top 5% for the borough.<sup>2</sup>

This data suggests a significant impact of alcohol consumption in the local area. While the above data does not relate to the specific premise, any premises that supplies alcohol in the area will be contributing to the trends relating alcohol to crime and disorder. This is especially pertinent in this case where there is evidence of irresponsible trade and breaching of licensing objectives.

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<sup>1</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC3170096/#R2>

<sup>2</sup> Safestats Merton. Data from Aug 2015-July 2016, accessed September 2017.

## 2. Public safety

- The Metropolitan police have received numerous complaints from neighbouring residents with regards to anti-social behaviour caused by customers of the premises concerned. This includes complaints of street drinking and drug use, verbal abuse, fighting and use of offensive language, and public urination. Residents have reported that they live in fear of abuse and feel helpless in being unable to protect their children from being exposed to the above harms.
- The recent Annual Residents Survey for Merton (2017) highlights that 17% of residents in this area of the borough are very worried or fairly worried about people being drunk and rowdy in public places. 23% are very concerned or fairly concerned about groups hanging around in the streets, and 15% of residents are very concerned or fairly concerned about people using or dealing drugs.<sup>3</sup> The Metropolitan police have recorded incidents on which they found customers of the premises in concern smoking cannabis in the back of the property.
- In terms of alcohol harm overall, in 2012, Merton ranked 55 out of 326 local authorities. This is to say that over 83% of boroughs in England have less alcohol harm overall than Merton. Within the borough, there is an element of variance in the degree of alcohol harm between different wards. Cricket Green, where this premises is located, has a higher admission ratio of hospital stays for alcohol-related harm than Merton, London, and England.
- The crime rate in Cricket Green is 6.5 offences per 1000 population. This is higher than the Merton value, and the highest number of offences recorded is 'anti-social behaviour'.<sup>4</sup> There is well-established link between alcohol misuse and anti-social behaviour.

## 3. Prevention of public nuisance

- The premises in concern are located in the Cumulative Impact Zone (CIZ) of Mitcham Town Centre, an area where it is recognised that there is a problem with the impact of alcohol on public nuisance. The premise owner signed the Responsible Retailers agreement to self-regulate the sale of high-strength beers and ciders, an attempt to mitigate the effects of alcohol on street drinking. However, records from the Metropolitan police reveal that this has not been implemented, and on a police visit to the premise following the signing of the agreement, almost all beer and cider stock on display was high in strength. In August 2017, the premises in concern sold alcohol to an undercover police officer outside of their licensed hours, which highlights an area of major concern.
- As described in Section 2, the Metropolitan police have received numerous complaints from neighbouring residents with regards to anti-social behaviour and public nuisance caused by customers of the premises in concern.

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<sup>3</sup> [https://www2.merton.gov.uk/residents\\_survey\\_research\\_report\\_2017.pdf](https://www2.merton.gov.uk/residents_survey_research_report_2017.pdf)

<sup>4</sup> [https://www2.merton.gov.uk/cricket\\_green\\_ward\\_health\\_profile.pdf](https://www2.merton.gov.uk/cricket_green_ward_health_profile.pdf)

#### 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>. It is therefore paramount that we protect our youths from the harm associated with the illegal selling of alcohol to those underage.
- Local data from the London Ambulance Service show that within 200m of the premises postcode there is particularly high volume of alcohol-related incidents in those less than 26 years of age (this falls in the top 20% rank in the borough).
- There are two schools located within 500m and 800m respectively of this premises, and this premises is likely to be on the main route home for many children from school.

While the London Ambulance Service data is not specific to the premises, there is a documented incident by the Metropolitan Police where the premises sold alcohol to an undercover officer out of licensed hours, which illustrates poor control measures and irresponsible selling.

#### Conclusion

The premises in concern have failed to display that they are a responsible retailer, despite numerous interactions with the Metropolitan police. In conjunction with the evidence revealing serious concerns about alcohol harm in the local population, we believe that the licensed premises are not running at a satisfactory enough level to prevent crime and disorder, assure public safety, prevent public nuisance, and protect children from harm. Therefore, we request that the Premise License LN/000002093 be revoked.

Yours sincerely,



Signed Electronically

Dr Rooah Omer

Specialty Registrar in Public Health

On behalf of Dr Dagmar Zeuner, Director of Public Health

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