

1. WIMBLEDON TOWN CENTRE CUMULATIVE IMPACT ZONE

(a)

Please tell us to what extent you agree or disagree that the Council should retain its special policy on cumulative impact in Wimbledon Town Centre to include all licence types?		
72 respondents		
Response	Number of respondents	% of respondents
Strongly agree	48	65%
Agree	14	19%
Disagree	1	1%
Strongly disagree	0	0%
Don't know	9	13%

(b)

Please tell us to what extent do you agree or disagree to the list of exceptions to the special policy on cumulative impact in Wimbledon Town Centre.		
72 respondents		
Response	Number of respondents	% of respondents
Strongly agree	9	13%
Agree	16	22%
Disagree	8	11%
Strongly disagree	26	36%
Don't know	13	18%

(c)

Please tell us if you have any comments about the Wimbledon Town Centre Cumulative Impact Zone? (Free text)	
Comments	Response
1(a) There is no need to license sale of alcohol after 1am. Westside tennis club, otherwise great, became noisier in the evenings (after 8pm) with the players becoming too excited about their games.	<ul style="list-style-type: none"> Noted. Before a premises licence can be granted, the applicant is required to prominently display a notice (on a pale blue paper) on the premises

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<p>(b) Are there any measures the council can impose to reduce that i.e. requesting the club to plant trees around their perimeter for noise reduction</p>	<p>containing a summary of the application for 28 consecutive days to allow any person to make a representation. For a representation to be considered as relevant the person making the representation is required to demonstrate to the Licensing Authority that granting the application would undermine any of the four licensing objectives under the Licensing Act 2003, namely, the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. The applicant is required to advertise the application in a local newspaper. A copy of the application is also sent to Responsible Authorities under the Licensing Act 2003 to comment on the application.</p> <ul style="list-style-type: none"> • If a relevant representation is received which cannot be resolved to the satisfaction of all parties, the matter is referred to the Licensing Sub Committee to determine the best course of action with the view to promoting the four licensing objectives (The prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm). • People living across the borough are encouraged to contact the Council’s noise service if they experience noise nuisance from any premises. Relevant enforcement action can be taken which may include additional conditions to be added to the premises by way of variation of a premises licence. The Council Environmental Health Section (Noise and Nuisance Team) works collaboratively with Licensing Officers to resolve issues relating to public nuisance emanating from a licensed premises.
<p>2. As a resident of Compton Road, Wimbledon I think that the Council should retain its present Cumulative Impact Zone, however if the Council considers the new list of exceptions, this new exception policy, will have an adverse impact on the present Cumulative Impact Zone and on our life as residents. It is important that a careful balance is retained.</p>	<ul style="list-style-type: none"> • Noted. • The cumulative impact policy to refuse an application can only be invoked if the Licensing Authority receives representations from residents, any persons or responsible authorities under the Licensing Act 2003 regarding the granting of a new premises licence application or variation of an existing licence. If a relevant representation is received, the matter is referred to the Licensing Sub Committee to determine the best course of action. Each application would be considered on its own relative merits with the view to promote the Licensing Objectives.

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	<ul style="list-style-type: none"> • If no representations are received, the Licensing Authority is legally required to grant the application in terms that are consistent with the operating schedule submitted by the applicant.
<p>3(a) As the number of licenced premises continue to grow at an increasing rate in Wimbledon, the need for a clear and robust Cumulative Impact Zone policy becomes ever more essential. The geography of Wimbledon, which is really a long high street, means that commercial premises are located cheek by jowl with many residential properties, therefore , it is essential that the impact of the growing number of licenced premises are managed effectively in terms of the noise, disturbance and public nuisance which they can easily generate if not clearly controlled and monitored. Therefore, we very much support the continuation of the CIZ, however, we consider that the new exceptions policy will undermine the effectiveness of the CIZ and urge you to maintain your current exceptions policy.</p> <p>(b) In addition to this, we would urge you to redefine your interpretation of daytime (REF: 3.2.b) to 9/10 pm rather than 11pm given the proximity of many of these licenced premises to family homes. We also do not see the relevance of ' former licence owners' as their new premises should be assessed on their new merits. (REF: 3.2.d) We would also comment that the conditions you quote on REF: 3.2.c are those that would be expected in the normal course of events and should be regarded as the basic standard not the basis of an exception.</p>	<ul style="list-style-type: none"> • People living across the borough are encouraged to contact the Council's noise service if they experience noise nuisance from any premises. Relevant enforcement action can be taken which may include additional conditions to be added to the premises by way of variation of a premises licence. The Council Environmental Health Section (Noise and Nuisance Team works collaboratively with Licensing Officers to resolve issues relating to public nuisance emanating from a licensed premises. • A conditional exception to the cumulative impact policy is proposed, with a time of 11pm. This does not mean every application before 11pm will be granted. As advised above, each application will still be considered on its own merits and on a case-by-case basis, and the Licensing Authority is empowered to refuse any application or restrict hours to earlier times if it is appropriate to do so when determining a contested application. • The time of 11pm is proposed in the Policy to be consistent when other relevant requirements that come into force at 11pm, and where trading after that hour has been considered to carry a greater risk of undermining the licensing objectives. This includes the requirement to be licensed for Late Night Refreshments between 11pm and 5am, and exemptions for Regulated Entertainment that is carried on before 11pm. • The Licensing Authority may propose an alternative time for the Cumulative Impact conditional exceptions but does not currently have evidence to demonstrate what alternative time would be more appropriate to promote the licensing objectives.
<p>4.By introducing the list of exceptions, I am concerned that some of the exceptions will effectively negate the cumulative impact zone, in particular the exceptions which relate to premises intending to open at night after 11pm. It would seem sensible to maintain the exceptions for premises that are not alcohol led and support daytime visitors.</p>	<p>Please refer to the response above.</p>

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<p>5. By now we have too many restaurants, bars etc. The local economy has become one-sided.</p>	<p>Noted. By adopting a Cumulative Impact Policy, the Council has recognised the potential impact on the promotion of the licensing objectives due to the number of licensed premises concentrated in one area. If relevant representations are received to premises licence applications, which cannot be resolved to the satisfaction of all parties, the application will be referred to the Licensing Sub Committee for determination as advised above.</p>
<p>6(a) Had thought key remit of CIZ was to CONTROL licensable activity in a delegated area. However, there seems to be a constant stream of licence applications, so the Town Centre (in particular) & even at base level of Wimbledon Hill are awash with licenced outlets. (b) NB Unable to comment on Question 2 as have no idea what the list of exceptions are. The background detail to allow respondents to make an informed comment is sparse in the extreme.</p>	<p>Noted. See above response.</p>
<p>7. Safer Merton Anti-Social Behaviour Team believe that it is currently been managed effectively and with the help of other external key partners</p>	<p>Noted.</p>
<p>8. I believe that the Council should be encouraged to maintain its existing exceptions policy that is limited to premises that are not alcohol led and support daytime visitors or the wider cultural offering (e.g., a concert hall, etc). In addition, the Council could add to an exception premises that operate in the daytime but defining as up to say 9pm. Former Licence Holders, however well behaved, still add to volume.</p>	<p>Noted. See above response</p>
<p>9. It is vital that the impact on local residents is kept under close scrutiny given the ever-increasing number of hospitality venues around Wimbledon.</p>	<p>Noted</p>
<p>10. It needs to be better policed for bad and anti-social behaviour.</p>	<p>Noted</p>
<p>11. Keep it as it currently is!</p>	<p>Noted</p>
<p>12. Licences should be severely restricted as the local impact and cost of drinking resulting in anti-social behaviour is unacceptable. I have had bricks through my front window, people urinating in my front garden, and people running up and down the cars parked in the road. All due to ant-social behaviour at closing time.</p>	<p>Noted. Residents are encouraged to report any anti-social behaviours issues linked to a licensed premises to the Council or Met Police for any criminal damage to property. Officers from the Council's Licensing Section work collaboratively with Responsible Authorities under the Licensing Act 2003 e.g., Met Police, Environmental Health Section (Noise and Nuisance Team) to resolve issues on licensed establishments that are causing crime and disorder and public nuisance to their neighbours. It should be noted that a premises licence can be reviewed at any time if there is evidence to demonstrate that the operation of a premises is undermining any of the four licensing objectives under the Licensing Act 2003.</p>

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13. More anti-social behaviour, drinking/drunken already being seen and vomit on streets. No more licences needed to encourage this.	Noted
14. Need to ensure not many late licences for bars and not many betting shops	Noted. The regulation of Betting Shops is controlled under the Gambling Act 2005 and not the Licensing Act 2003.
15. Resident need to be consulted fully.	Noted.
16. Retaining the CIZ without the exceptions (which exceptions would really negate CIZ) is vitally important given the nuisance caused by ever growing number of hospitality venues licensed to serve alcohol. There is increasing drunkenness and disorderly behaviour in the area.	See above response.
17. The plan to demolish a central part of Wimbledon, opposite the station, replacing it with much larger construction, is not helping the residents and businesses in that town.	The Council local plan is considered by the Planning Authority.
18 (a) The proposed expanded exceptions policy would negate the effect of the CIA as it i) refers to 'daytime' premises as those operating until 11pm - impact (noise, disturbance, crime etc) often occurs from 10pm ii) refers to 'small' premise as 50 or less iii) contains an exception for premise operating post 11pm simply requiring measures such as door staff, CCTV which are 'normal' requirements for licensed bars, nightclubs etc. (b) The executions policy should be reconsidered and limited, for example to seated restaurants serving alcohol post 11pm.	Please refer to the response above.
19. There has been an increase in noise complaints in the cumulative impact area from licenced premises and therefore there the existing cumulative zone should be retained.	Noted
20. This CIA is extremely important to retain. The Town Centre needs to be analysed on a cumulative basis given the high number of similar retail types - especially alcohol sales and restaurants.	Noted
21. Too many shops have closed and then reopened as bar or restaurant. Very noise at night.	Noted. People living across the borough are encouraged to contact the Council's noise service if they experience noise nuisance from any premises
22. We need to have more places for entertainment in the evening in Wimbledon	Noted
23. (a) We often empty cans, smoking and drug garbage and public urination and vomit around the public library & St Marks Church. St Marks Place is unusable as a street on warm evenings because it is used by the Alexandra as a licensed premises.	

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<p>(b) Wimbledon library regularly hosts events with music that disrupts the nearby residential community.</p> <p>(c) I enjoy a drink too - but want to live and work in a community that offers multiple kinds of activities, not only alcohol.</p>	
<p>24. (a) Wimbledon town and Hillside have increasing numbers of licensed premises, and this will further increase with the addition of two hotels (Bank Buildings, with a roof terrace, the old Lidl building, possibly with a roof terrace.</p> <p>(b) The proposed new exceptions would massively weaken the ability of the council to control alcohol sale and distribution in the area, which is potentially damaging to the neighbourhood, where residential accommodation sits cheek by jowl with a increasing number of off sales and hospitality offerings.</p>	<p>See comments above re: Cumulative Impact Policy (CIP) and how applications within the CIP are determined.</p> <p>See above comments.</p>
<p>25. Wimbledon Town Centre has become too noisy and too dirty. Dangerous place now.</p>	<p>Noted. People living across the borough are encouraged to contact the Council's noise service if they experience noise nuisance from any premises. Contact the Met police for issues relating to crime and disorder.</p>
<p>26. We are awash with licensed premises with more applying (seemingly) every week. Residents awake to find vomit/bottles by the side of the road ...sometimes even in their front gardens. Premises might close at set time, but customers meander back (chatting) to their cars parked in nearby roads so there is a lot of late-night noise.</p>	<p>Noted. See comments and advice provided above.</p>
<p>Comments from Responsible Authorities under the Licensing Act 2003</p>	
<p>Merton Public Health supports the ongoing use of a CIZ in Wimbledon town centre as controlling the supply of alcohol and ensuring that the supply of alcohol is conducted in a way which reduces any negative outcomes are important ways in which to reduce the overall burden of alcohol related harm on the local population. The Public Health Team supports the exceptions.</p>	<p>Noted</p>
<p>The Metropolitan Police Service are in support that the CIZ remains in place in Wimbledon Town Centre due to the reasons demonstrated in the report. The town centre remains one of the busiest areas in Merton Borough and The MPS identifies that LBM are taking steps to attract businesses that would benefit from the special exceptions in the policy.</p>	<p>Noted</p>
<p>The Environmental Health (Noise & Nuisance) Team; There has been seen an increase in noise complaints in the two cumulative impact zones (Wimbledon Town Centre and Mitcham Town Centre) from licenced</p>	<p>Noted</p>

premises over the previous years and based on this evidence they see no reason not to retain the existing cumulative impact zones.	
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2. MITCHAM TOWN CENTRE CUMULATIVE IMPACT ZONE

(a)

Please tell us to what extent you agree or disagree that the Council should retain its special policy on cumulative impact in Mitcham Town Centre to include only off license premises?		
66 respondents		
Response	Number of respondents	% of respondents
Strongly agree	28	42%
Agree	12	18%
Disagree	4	6 %
Strongly disagree	3	5%
Don't know	19	29%

(b)

Please tell us to what extent you agree or disagree to the list of exceptions to the special policy on cumulative impact in Mitcham Town Centre.		
66 respondents		
Response	Number of respondents	% of respondents
Strongly agree	9	14%
Agree	12	18%
Disagree	8	12%
Strongly disagree	14	21%
Don't know	23	35%

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(c)

To what extent do you agree or disagree that the Mitcham Town Centre cumulative impact zone should be extended to other license types?		
66 respondents		
Response	Number of respondents	% of respondents
Strongly agree	18	27%
Agree	11	17%
Disagree	7	11%
Strongly disagree	3	3%
Don't know	59	64%

(d)

If you would like the cumulative impact zone in Mitcham town centre to cover different licence type, please tell us which licences you think it should cover and what evidence do you have for this?
(Free text)
Comments
Consideration should be given to extending the CIZ to cover on-license premises. This would align the CIZ with the Wimbledon CIZ and will ensure the Council can prevent any escalation in problems caused by an increase in sales from on-licenses.
Mitcham needs anything, literally ANYTHING, to make it more attractive to people who have jobs & want to spend their money locally. The CIZ should only cover different licence types that enhance the overall area. Alcohol-related licences will generally lead to anti-social behaviour. How is this going to be policed?
No this part of the borough is too much of a high crime area

(e)

Please tell us if you have any comments about the Mitcham town centre Cumulative Impact Zone?	
(Free text)	
Comments	Response
Keep the CIZ	Noted
1. Mitcham Town Centre urgently needs time, money and resources to make it a more attractive place for business and social engagement. Currently, when passing through it (as there's nowhere nice to stop inside it), you are	Noted

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<p>confronted by the sense that it is a socio-economically poor area, where non-tax paying, benefit-claiming, fly-tipping individuals go with no pride, no sense of ownership and absolutely zero ambition to make it better. It's really such a shame</p>	
<p>2. Safer Merton Anti-Social Behaviour Team - The cumulative impact zone in Mitcham is working effectively and with the help of other partnership scheme within the area, we are seeing a massive drop in Alcohol related Anti-social behaviour.</p>	<p>Noted</p>
<p>3.(a) The idea that an existing license holder, however responsible (or not) should be able to expand their alcohol offering without consideration by the licensing committee strikes me as unwise - sometimes proliferation will be damaging to the neighbourhood however good the existing license holder.</p> <p>(b) I have no objection to florists being able to sell champagne, but I would not be equally sanguine about party shops being able to sell alcohol, for example, and I think it is better for the council to retain its powers and exercise discretion appropriately, rather than to reduce the powers it has to protect Mitcham centre where necessary.</p>	<ul style="list-style-type: none"> • An existing licence holder can apply to vary their licence to change their operating schedule. The applicant is legally required to advertise the application at the premises (on a pale blue notice) for 28 consecutive days to allow any person to make a representation. For a representation to be considered as relevant, the person making the representation is required to demonstrate to the Licensing Authority that granting the application would undermine any of the four licensing objectives under the Licensing Act 2003, namely, the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm. The applicant is also required to advertise the application in the newspaper. A copy of the application is also sent to Responsible Authorities under the Licensing Act 2003 to comment on the application. • If a relevant representation is received which cannot be resolved to the satisfaction of all parties, the matter is referred to the Licensing Sub Committee to determine the best course of action with the view to promoting the four licensing objectives. • If there are no representations, the Licensing Authority is legally required to grant the application in terms that are consistent with the operating schedule submitted by the applicant.
<p>Comments from Responsible Authorities under the Licensing Act 2003</p>	
<p>4. The Metropolitan Police Service are in support that the CIZ remains in place in Mitcham Town Centre due to the reasons demonstrated in the report. The town centre still experiences high levels of street drinking causing ASB in Merton Borough. The MPS identifies that LBM are taking steps to attract businesses that would benefit from the special exceptions in the policy and could be beneficial to the local area and residents in return.</p>	<p>Noted</p>
<p>5. The Director of Public supports the continuation of the special policy on cumulative impact in Mitcham Town Centre, which is</p>	<p>Noted.</p>

<p>restricted to off-premises sales, based on data presented in the Merton Cumulative Impact Analysis. However, Public Health Team have also stated that consideration should be given to extending the Cumulative Impact Zone (CIZ) to cover on-licensed premises. This would align the CIZ with the Wimbledon CIZ and will ensure the Council can prevent any escalation in problems caused by an increase in sales from on-licensed premises.</p>	
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3. INTRODUCING A SPECIAL POLICY ON CUMULATIVE IMPACT IN ANOTHER AREA OF THE BOROUGH

<p>Please tell us where you think new cumulative impacts zones should be and what evidence you think there is for this? (Free text)</p>	<p>Comments</p>
<p>No need.</p>	
<p>Around Morden station - again there seems to be development of many similar retail types and given the terminus of the northern line, there may be a missed opportunity without a good CIA in place.</p>	
<p>Safer Merton Anti-Social Behaviour Team believe that Morden Town Centre could benefit from cumulative impact zone because of the sudden increase in rough sleepers and street drinker in the area.</p>	
<p>Perhaps Raynes Park?</p>	
<p>I think for any Town Centres, the new cumulative impacts zones need to be very carefully considered. We already have high levels of anti-social and unruly behaviour at night-time in our town centres, driven by alcohol and drugs. Who is going to police the rules? Who is going to clear up the vomit and rubbish, the morning after? Think carefully before letting this genie out of the bottle...!</p>	
<p>Just have Lidl's and Aldi's in Mitcham town centre for cumulative zones.</p>	
<p>Wimbledon village - again too many hospitality venues and charity shops</p>	
<p>Wimbledon Village. Occasional anti-social behaviour, but especially during Wimbledon tennis fortnight and major football tournaments.</p>	
<p>Merton Council Public Health Team have not recently conducted a review of the spread of alcohol related harms across Merton</p>	

RESPONSE STATISTICS:

91% of those that answered stated that they lived in the borough (50 respondents).

11% of those that answered stated that they were replying on behalf of a resident or community organisation (6 respondents).

No responses were received from a business or commercial organisation

Responses from Responsible Authorities under the Licensing Act 2003:

- **Metropolitan Police**
- **Public Health Authority**
- **Environmental Health Pollution (Noise and Nuisance)**

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From: Alan Gibbs

Sent: Monday, January 15, 2024 4:59 PM

To: Licensing Licensing@merton.gov.uk

Subject: Review of cumulative impact assessments

Sent on behalf of the Conservative Group

From the evidence presented in the consultation report it is clear that the current arrangements are not working to protect residents from the adverse effects on alcohol consumption, primarily in South Wimbledon and Mitcham.

The report shows a clear correlation between the locations of licensed premises and noise complaints, alcohol related ambulance call outs, ambulance call outs for assaults, hospital admissions for alcohol related conditions, violence with injury (non-domestic), anti-social behaviour and violence. This is also confirmed by the data from the Anti-social Behaviour Team which shows that the worse affected wards are in South Wimbledon, Colliers Wood and Mitcham.

The data presented on these different types of alcohol driven anti-social behaviour has been reflected in the 2021 residents' survey. This survey shows that people in Merton feel far less safe going out after dark than they did when asked the same question in 2019, with a 21% drop in the two years between the surveys. Additionally, a general feeling of the area being unsafe is far more pronounced in Mitcham and the East of the borough which are known hotspots for alcohol fuelled disorder.

Clearly the council needs to take stronger action that it has to date. Instead of attempting to go into reverse gear by offering exemptions to the CIZ in Wimbledon, the council must come up with new strategies to keep Wimbledon and Mitcham residents safe and protect the public from the adverse effects of alcohol consumption. The council must look at tightening the existing regulation and consider what more can be done to combat alcohol related anti-social behaviour which has continued to create negative consequences for Merton residents.

Merton Conservative would also support the immediate adoption of measures to tackle anti-social behaviour in other local centres of the borough such as Wimbledon Village, Colliers Wood, Morden and Raynes Park if evidence emerges to support such measures, or local residents demand them due to increases in incidents of anti-social behaviour.