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**METROPOLITAN  
POLICE**

**TOTAL POLICING**

TERRITORIAL POLICING

## Representations On Behalf Of The Commissioner For The Metropolitan Police

### Police Objection

#### **Application for a variation of a Premises Licence**

**Collect & Go Wine  
882 London Road  
Thornton Heath  
Croydon  
CR7 7PB**

- **Prevention of Crime and Disorder**

These representations are based on Croydon Councils Statement of Licensing Policy published in 2013.

They are based on the principals set out in the policy taking into account the measures set out between 4.10 to 4.31

This application is for a material variation to increase the hours by which alcohol may be sold off the premises. The application is for an extra 2 hours Monday to Sunday midnight until 2am.

This off-licence falls directly in the middle of an area of London Road designated as a Cumulative Impact Zone, starting at Broughton Road to the south and ending at Melrose Avenue to the north. It is in plain sight of 3 other licensed premises authorised for the sale of alcohol off premises.

Whilst this premises itself is not the generator of crime and disorder it is widely accepted that there is a direct link to the supply and availability of alcohol to crime, disorder and anti- social behaviour. It is my submission that you cannot reduce this if the availability of alcohol is increased in areas already designated as areas of saturation.

Below is an extract from Croydon Council's Statement of Licensing Policy. It is based on statistics which are a couple of years out of date but it is clear that current statistics are likely to paint a more disturbing picture.

*Croydon experiences significant crime problems from alcohol related crime. Out of 326 local authority areas in England, Croydon is ranked 298 for all alcohol related crimes<sup>i</sup> (where 1 is the best and 326 the worst). It is also rated 282 out of 326 for both alcohol-related violent crimes and for alcohol-related sexual offences<sup>1</sup>.*

*Over the last three years the number of alcohol related ambulance call outs in Croydon has increased from 1947 calls in 2010-11 to 2194 calls in 2011-12 and 2493 calls in 2012-13. Out of a total of 33 London boroughs, Croydon has the 6<sup>th</sup> highest ambulance call outs related to alcohol<sup>ii</sup>.*

*Data<sup>iii</sup> shows that there is a strong relationship between alcohol and a range of crimes including violence (see Appendix 7). Alcohol is a factor in:*

*37% of cases of violence against a person  
17% of burglaries  
13% of cases of theft and handling of stolen goods  
47% of robberies*

*There is evidence<sup>iv</sup> of a clear positive relationship between increased premises density and alcohol consumption in adults and young people. The evidence shows that increases in alcohol outlet density tends to be associated with not only an increase in alcohol consumption, but also alcohol related crime and violence and under 18 alcohol specific hospital admissions.*

*The majority of Croydon residents aged 16 and over are thought to drink alcohol at levels that are unlikely to cause harm (lower risk). However, estimates suggest that around 18% of Croydon residents who do drink alcohol do so at increasing risk levels, and 7% drink at higher risk levels<sup>1</sup>.*

*It is not only the amount of alcohol consumed that increases the risk of harm. Binge drinking, which refers to a pattern of drinking in which a person consumes at least twice the daily recommended amount of alcohol in a single drinking session, can cause acute intoxication and lead to problems such as accidents, injury and violence. Nationally, Croydon is ranked the seventh worst borough for binge drinking and it also ranks twice the London average<sup>1</sup>.*

*Over the last seven years, drinking behaviour has changed where more people*

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*now purchase alcohol from supermarkets and shops. Croydon has seen a 12% increase in the number of off licences and a 20% decrease in the number of pubs<sup>v</sup>. This indicates a significant shift in sales of alcohol from the "on" trade to the "off trade". The Licensing Authority wish to ensure that the policy recognises this shift in drinking patterns. There is a good evidence base<sup>vi</sup> that effective interventions to reduce the negative impacts of alcohol are those that restrict the ease of acquiring alcohol itself . This can be achieved by increasing the cost of alcohol but also reducing the hours and days of sale and by restricting the number of outlets.*

*In a recent (August 2013) business and consumer survey conducted by the Croydon Town Centre Business Improvement District<sup>vii</sup>, street drinking was identified as a problem by 28% of consumers of whom 5% thought that it was a priority to improve. This view was shared by local businesses for whom street drinking at night was also a cause for concern with 71% considering this as needing improvement or a priority; street drinking during the day, while less pronounced in terms of responses was also a concern at 65%*

This application is not based on any aspect of diversity or cultural need, therefore the Metropolitan Police request that this application be refused.

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Licensing Officer  
Croydon Police Station

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