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Dear Licensing,

Variation for Premises Licence for Bell Green Food and Wine, 66 Bell Green Sydenham SE26 4PZ

As a responsible authority, the Interim Director of Public Health is writing to make representation against the sale of premium and craft beers, stout and cider above 6.5% ABV (alcohol by volume) for a premises licence in respect to Bell Green Food and Wine under the following licensing objectives:

- 1) The prevention of crime and disorder
- 2) Public safety
- 3) The prevention of public nuisance
- 4) The protection of children from harm

Alcohol misuse is a strong contributory factor to alcohol related harm including in a wide range of offences, including crime and violent crime:

- public order offences (often antisocial in nature, these can involve disorderly groups of people; rowdy, threatening and abusive behaviour; and urinating in public)
- criminal damage
- minor and serious assaults
- violent offences
- traffic offences

There are clear links between alcohol consumption and crime, particularly for alcohol related violence. According to the British Crime Survey 2014/15, victims believed the offender to be under the influence in over half of all violent incidents (47%) of violent offences.

The government's alcohol strategy 2012 addresses alcohol related disorder and violence that affects communities and aims to support them to tackle local problems. The strategy also recognises that Local Authorities are best placed to tackle alcohol related issues through restricting opening and closing times.¹

The National Institute for Health and Care Excellence (NICE) demonstrates that making it less easy to buy alcohol, by reducing the days and hours when it can be sold, is an effective way of reducing alcohol-related harm.²

¹ The Government's Alcohol Strategy – March 2012

² Alcohol Use Disorders: Preventing Harmful Drinking - NICE Guidelines (PH24) 2010

Public Health England's ³ evidence review includes details of initiatives undertaken to restrict the sale of high strength alcohol. Evidence suggests that this has led to a decrease in alcohol-related crime in the intervention area.

Lewisham Borough has signed up to the School Superzones pilot project, established in the context of the London Health and Social Care Devolution Memorandum of Understanding (London Devolution). The aim of the project is to create a healthier and safer environment for children to live, learn and play, by creating 'superzones,' a 400m radius around schools within which actions are taken to protect children's health and encourage healthy behaviours through interventions that target: unhealthy food and drink sales, advertisements, alcohol, smoking, gambling, air quality, physical inactivity and crime. In Lewisham, our pilot School Superzone is around Haseltine Primary School in Bellingham ward. Bell Green Food and Wine is within the 400m radius of Haseltine School.

According to the most up to date data available:

- Bell Green Food and Wine, 66 Bell Green Sydenham is located in Bellingham Ward in Neighbourhood 4 in Lewisham.
- Bellingham Ward ranks 5th highest out of 18 wards in Lewisham for Criminal Damage (Other); 6th highest for All Violence recorded out of 18 wards.
- Bellingham Ward ranks 5th highest out of 18 wards in Lewisham for Alcohol Illness treated by an Ambulance for 18 years and above.

According to the Greater London Authority (GLA) Cumulative Impact Analysis Tool – February 2019,

- There were a large number of Ambulance Recorded Assaults (74), Alcohol Related Incidents (128), Alcohol Related Incidents aged under 26 years (18) and Bus Driver Reported Anti-Social Behaviour (40) within a 500m radius of Bell Green Food and Wine. The majority of these incidents are concentrated between 200m-500m away from the location.

Therefore, I urge giving careful consideration to increasing the sale of alcohol above 6.5% ABV (alcohol by volume) within this area.

Yours sincerely

Catherine Mbema
Interim Director of Public Health

³ The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies: An evidence review