

Cumulative Impact Assessment (CIA) Data Report – 2023 renewal



Introduction and background to this Data Report

- The purpose of this data analysis is to inform the decision-making process in relation to renewing the Borough's Cumulative Impact Assessment (CIA). After publishing a CIA, the licensing authority must, within three years, consider whether it remains of the opinion set out in the assessment. This decision making process, after data analysis and consultation, could result in growth of the CIA area, a reduction in the area, or cessation of the policy altogether. Guidance on CIA can be found in Section 14.20 of the Section 182 Statutory Guidance [Revised Guidance issued under section 182 of the Licensing Act 2003 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/guidance/section-182)
- The concept of "Cumulative impact" has been used by licensing authorities within their statements of licensing policy since the commencement of the 2003 Act. Cumulative impact assessments were introduced in the 2003 Act by the Policing and Crime Act 2017, with effect from 6 April 2018. ***Cumulative impact is the potential adverse impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area.*** We often refer to this as 'saturation'.

What is a Cumulative Impact Assessment (CIA)?

- As a Licensing Authority the council is required to ensure that any decision relating licence applications for the sale of alcohol, regulated entertainment or late-night refreshment is consistent the four 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.***
- Each licence application must be considered on its merits however it is recognised that in some areas the cumulative affects effects of multiple premises in a specific area or locality may have the potential to undermine one or more of the licensing objectives. Where this is the case, the council may introduce a cumulative impact policy.
- A cumulative impact policy creates the ***presumption that new and variation applications for premises that are likely to add to the cumulative impact will normally be refused*** unless the applicant is able to comprehensively demonstrate in their operating schedule that granting the application will not undermine one or more of the licensing objectives – known as a rebuttal presumption.
- The cumulative impact policy to refuse an application can only be invoked if the council receives representations from residents, interested parties or responsible authorities regarding the granting of a new premises licence of varying an existing licence. It does not prevent applications in the areas, and each case will be decided on its own merits, but applicants will have to comprehensively demonstrate in their application that it will not add to existing problems in the area.

Current areas covered by Newham's Cumulative Impact Policy

- The current policy covers large swathes of the borough (**figure 1**) including areas around Stratford, Plaistow, Barking Road, Romford Road, Upton Park, East Ham, Manor Park, Forest Gate, the ExCel Centre and North Woolwich. This can be seen on an interactive map at [Cumulative impact zones \(CIZ\) - interactive premises checker map – Newham Council](#)

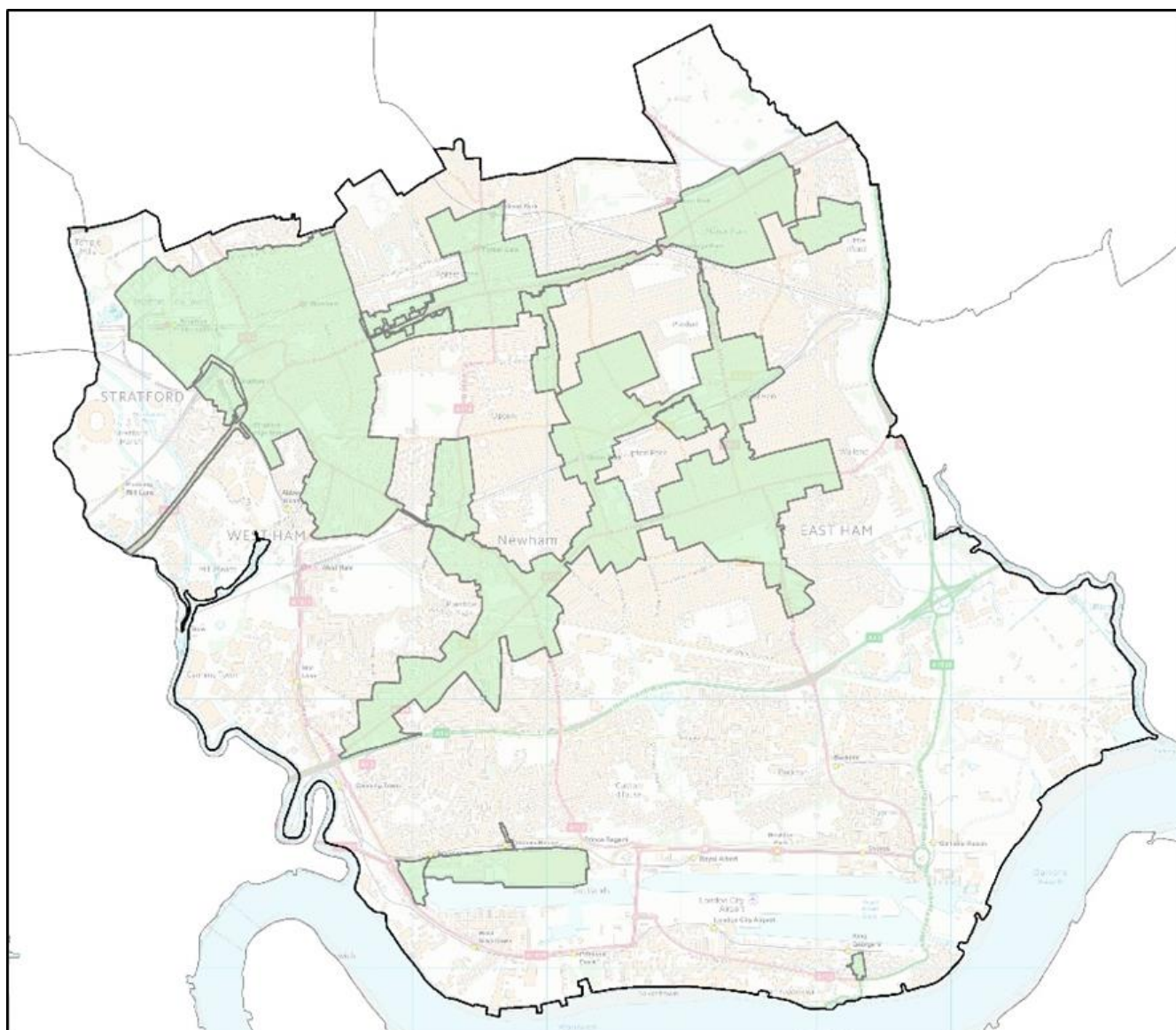


Figure 1 – current extent of the cumulative impact policy, note the substantial coverage of large swathes of the borough including whole roads such as Barking Road and Romford Road, and the ExCel exhibition centre which is an area of low crime and significant footfall and business, with a potential for an increased night time and licensed economy, including hospitality

Is a CIA approach an outdated tool?

- The COVID-19 pandemic and associated lockdowns and restrictions have had a devastating effect on the UK's night-time economy, with many businesses in the sector not surviving. The damage done has been compounded by the loss of EU labour markets and the escalating cost of living. While the sector has rebounded since the lifting in England of night-time economy restrictions in July 2021, many of those businesses that survived the last two years are struggling, with footfall and advanced bookings still much reduced compared to pre-pandemic levels.
- As a result of the above, there has been a national trend in reviewing and reducing, or removing altogether, cumulative impact policies. This reflects a change in the business landscape post pandemic, and large amounts of square footage available on most highstreets due to the significant decline in retail operations.
- This data analysis and policy review will therefore be undertaken with the above context in mind, as well as a recognition that cumulative impact policies may actually be a barrier to improving standards as their presence can prevent new operators giving little incentive for existing ones to improve their offer or reinvest.
- An example of a large urban area without a cumulative impact policy is Manchester City Centre, if there is no cumulative impact policy an application can still be judged as to whether it is going to promote the licensing objectives or whether it would have an adverse effect.
- This approach also aligns with a recent push on mediation and offering comprehensive pre-application advice for applicants by Newham's licensing team which has seen a reduction in sub-committee hearings (**figure 2**).



WE ARE SUPPORTING BUSINESSES.

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Need a Premises Licence?
Get help from our pre-application advice service

Should you or your business wish to supply alcohol, to provide recorded or live music, perform plays, exhibit films, host sporting events or even provide hot food and or drink late at night, in order to do so lawfully your business will need a Premises Licence.

Whether you are taking over an existing premises such as a bar, pub or restaurant, or are planning on building a new premises you must ensure you have the correct licence before you begin trading.

As part of the application process, the public or local residents and responsible authorities such as the police, local noise team and trading standards may make representation against your premises licence application during a 28 day public consultation period. Objections from any relevant parties will be considered by the local licensing committee.

The Licensing Team now offer a valuable pre-application advice service where we can discuss your business and put your requirements into a formal application which will address, not only the:

- **Four Licensing Objectives** (the Prevention of Crime and Disorder, Public Safety, the Prevention of Public Nuisance and the Protection of Children from Harm.)
- **Newham Licensing Policy**
- **Local Policies** (Cumulative Impact Zone)
- **Challenge 25 Scheme.**

We will help you with your premises plans and drawings and we can advise you on any changes you should consider in order to have the best chance of a successful application.

We offer not only expert advice but extremely competitive fees, on all of the following areas:

- Applications for a new Premises Licence
- Varying a Premises Licence
- Minor Variations of a Premises Licence
- Transfer of a Premises Licence
- Change of Designated Premises Supervisors
- Late Night Refreshment (including deliveries and takeaways)
- Club Premises Certificates
- Applications for Club Premises Certificate

CONTACT

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Figure 2 – pre-application advice for applicants, the introduction of this service in 2022 has led to a significant drop in cases going to sub-committee and an increase in mediation between responsible authorities and applicants, which has driven up standards and enabled responsible business to grow

Methodology of the data analysis to support the review

- Data used for this report covers the Financial Year 2022 – 23 (April 22 – March 23).
- Metropolitan Police Service (MPS) reported crime that was recorded as taking place at a Licensed Premises.
- MPS reported Computer Aided Dispatch (CAD) Callouts. This is most commonly where data for MPS reported Anti-Social Behaviour is recorded. For this report CAD data was obtained on closing/qualifying code where the code was rowdy/inconsiderate behaviour (202), street drinking (209) or alcohol related (600).
- London Ambulance Service (LAS) recorded callouts to alcohol related incidents. This data is stored on SafeStats, a data sharing portal from MOPAC for local authority use.
- Newham reported Anti-Social Behaviour recorded on Uniform where Street Drinking was used as a description.

MPS Reported Crime from Licensed Premises

- There were 158 offences over 2022 – 2023 with a venue type of Pub/Bar/Nightclub.
- Theft was the main driver of offences in these venues with the most common offence being other theft, followed by common assault, theft from the person was third.
- The main hotspot for offences on licences premises was in Stratford, this was followed by Canning Town (**figure 3**).
- Stratford's main crime issue was other theft, followed by common assault.
- Canning Town's main issue was also other theft, followed by an even spread of burglary, theft from the person and assault.

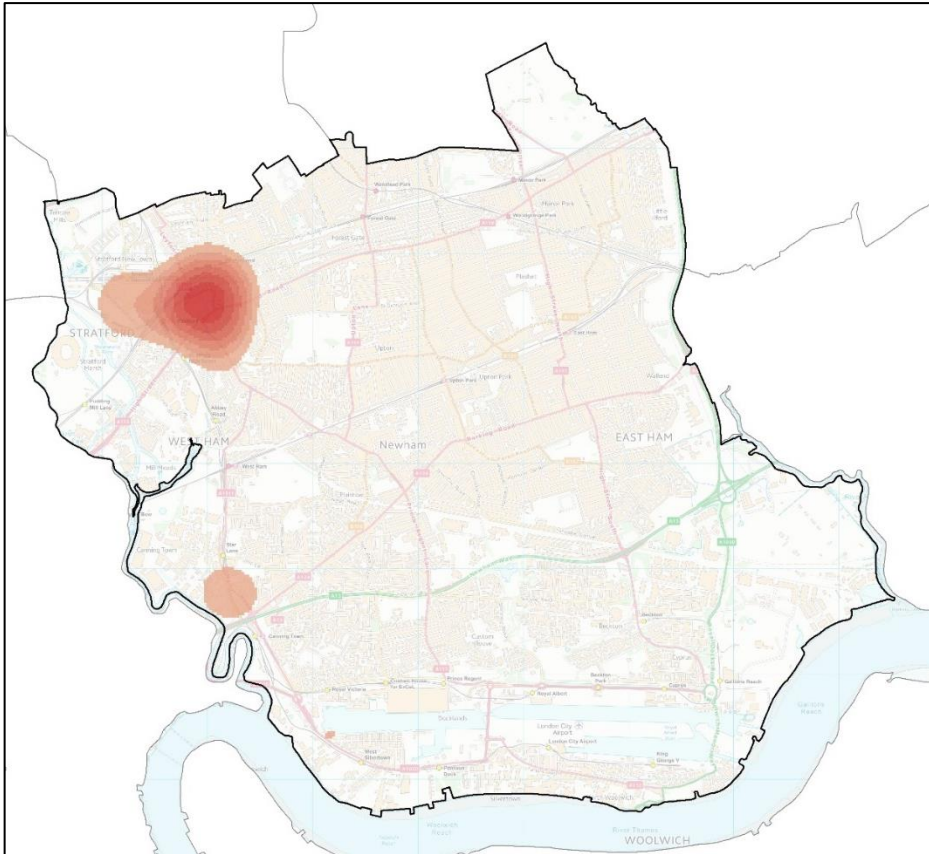


Figure 3 – the main hotspots for offences on licensed premises being Stratford and Canning Town

MPS Recorded CAD Callouts

- There were 8,237 CAD callouts to incidents. This is the first response system for the police and the best way of extracting anti-social behaviour information.
- 4,343 of these were related to rowdy/inconsiderate behaviour (4,223 incidents), street drinking (23 incidents) or alcohol related (406 incidents). Incidents can contain several codes so there is a chance of double counting.
- Hotspots in East Ham, Upton Park, Forest Gate, Stratford and Canning Town (**figure 4**).

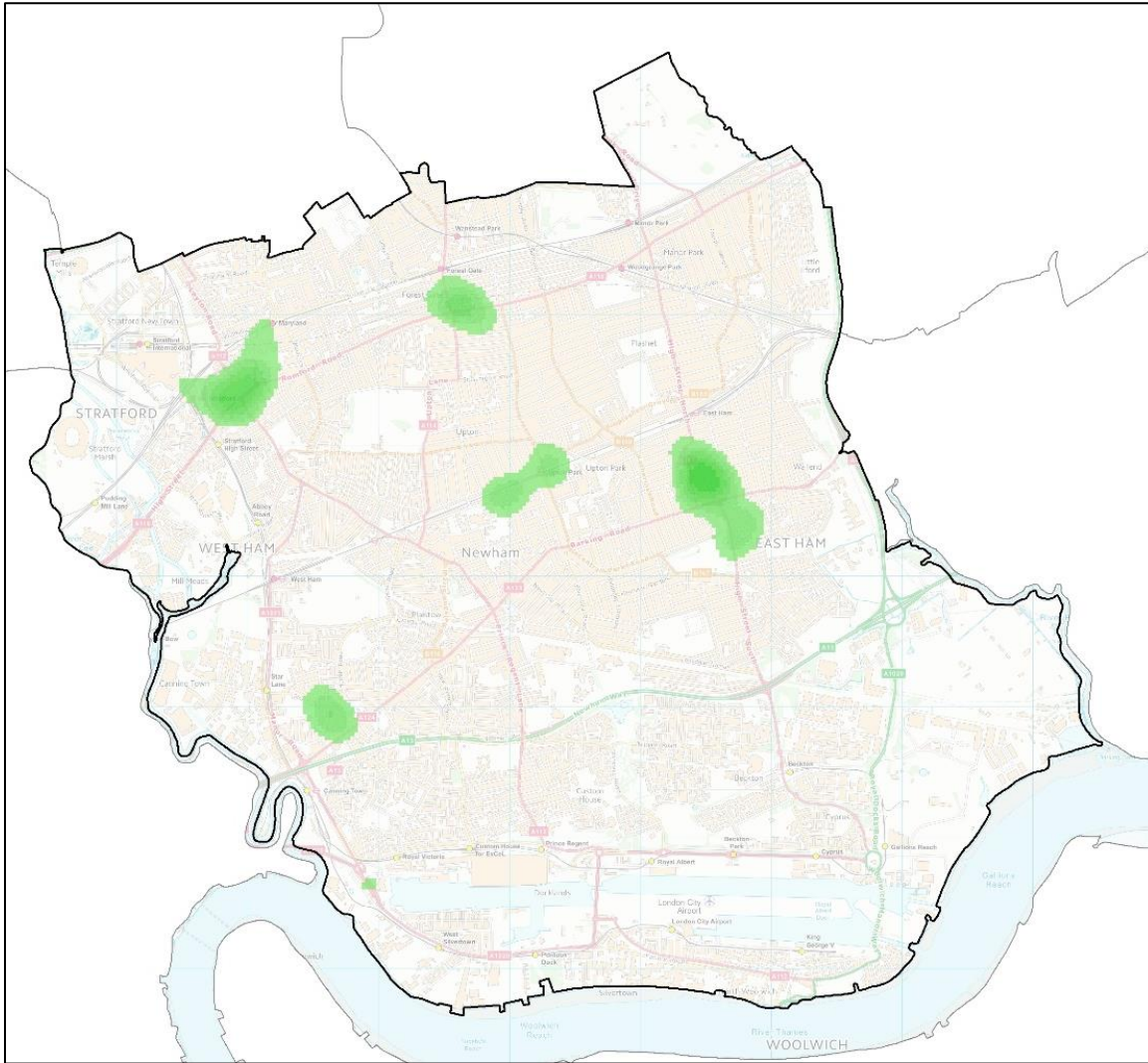


Figure 4 – CAD callout data from MPS in relation to alcohol related callouts, with hotspots in East Ham, Upton Park, Forest Gate, Stratford and Canning Town

- CAD callouts to street drinking had their main hotspot in East Ham (**figure 5**). This certainly backs up observational feedback from Community Safety enforcement officers, officers from Licensing & Regulation and the Mets Safer Neighbourhood Team, with a substantial project currently focussing on East Ham High Street North in relation to street drinking and ASB.
- Alcohol related CAD callouts had a large hotspot in East Ham followed by Forest Gate, Stratford and the area of Victoria Dock (**figure 6**). These areas are also corroborated with officer's observations, except the small area in Royal Victoria Dock which is thought to be associated with a residential address and not licensed premises.

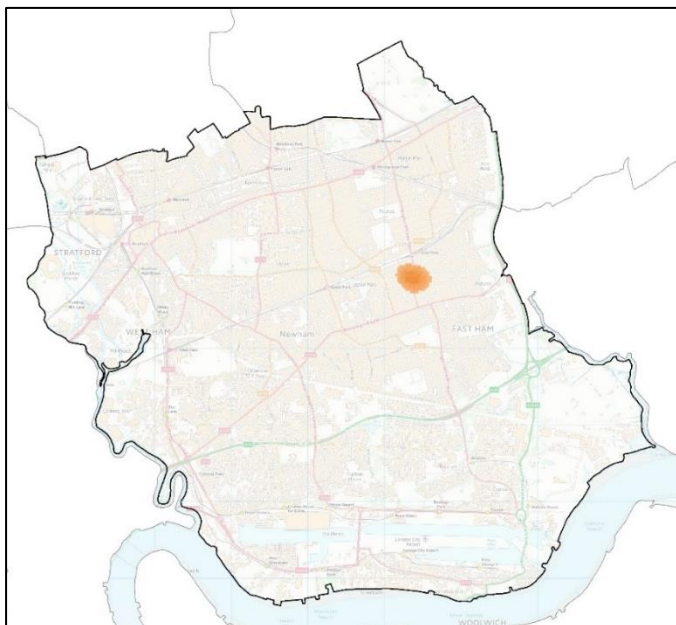
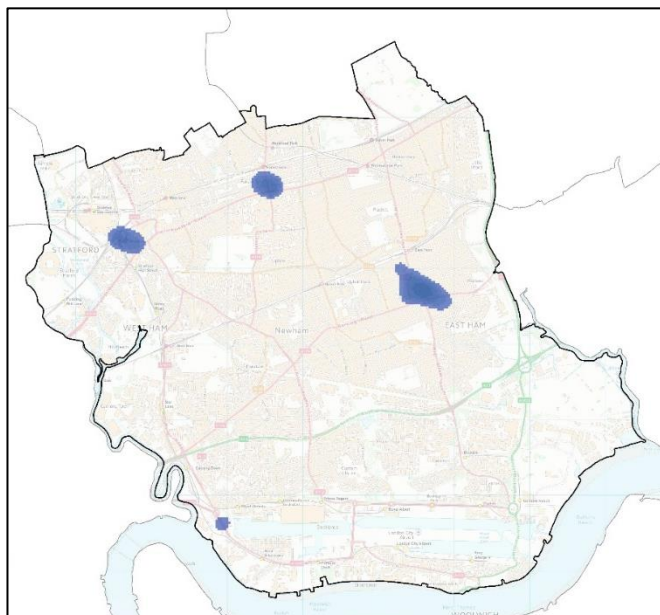


Figure 5 – CAD callouts to street drinking, hotspot in East Ham (High Street North)

Figure 6 – CAD callouts (alcohol related), hotspots in East Ham, Forest Gate and Stratford



London Ambulance Service (LAS) Callouts to Alcohol Offences

- 2022/23 saw 1,178 alcohol related callouts from the ambulance service. This is a small decrease from 2021/22 which saw 1,684.
- 343 of these were due to people being unconscious or fainting followed by 112 falls. These were also 2 of the chief complaints reported during 2021/22.
- This data is stored differently to other sources in the report. Instead of coordinates for hotspots it has to be mapped to local geographies which calculated how many incidents have taken place within this area.

- Hotspots were in Stratford, East Ham, along Barking Road particularly around Canning Town towards Plaistow and around Newham University Hospital (the hospital data is due to an offence being recorded at hospital due to a victim being in hospital but the location of the incident being uncertain so can be discounted for this report) (**figure 7**).

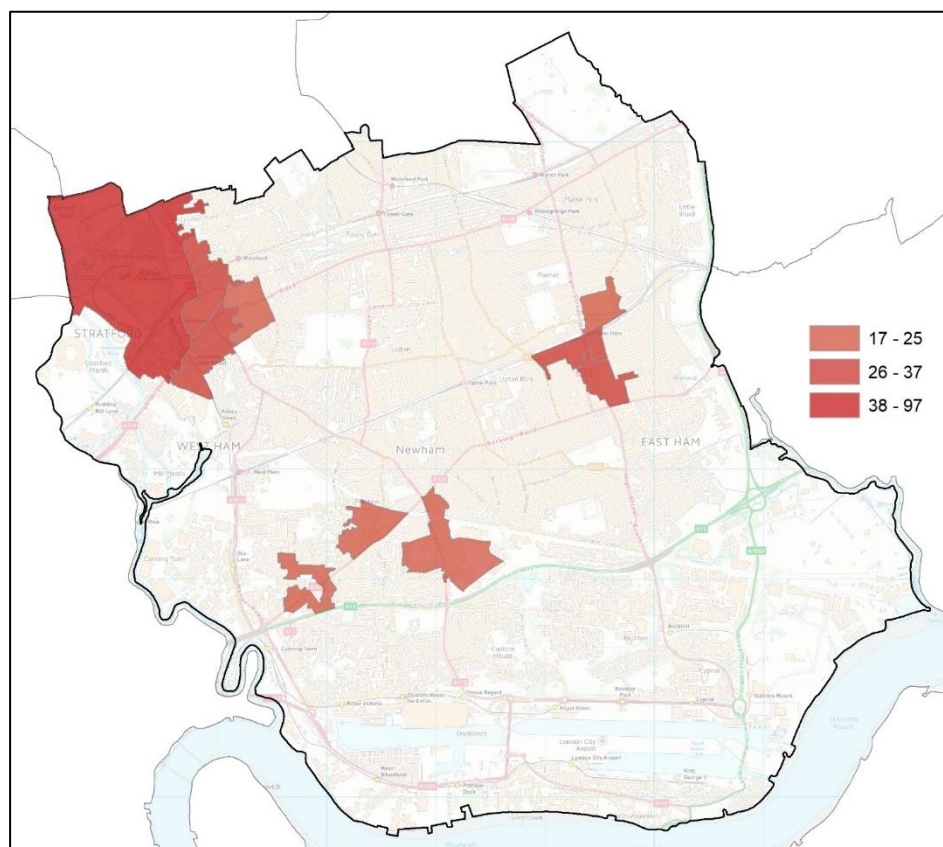


Figure 7 – alcohol related callouts from the ambulance service, hotspots being Stratford, East Ham, along Barking Road particularly around Canning Town towards Plaistow

- Since the pandemic there has been evidence to show an increase in drinking at home, with Government data showing an accelerated increase post pandemic in alcohol-related hospital admissions and deaths. Therefore, health related data may not reflect consumption of alcohol on licensed premises [Monitoring alcohol consumption and harm during the COVID-19 pandemic: summary - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/monitoring-alcohol-consumption-and-harm-during-the-covid-19-pandemic-summary)

Anti-Social Behaviour Reported to Newham in Regard to Street Drinking

- Newham community safety team responded to 93 street drinking complaints a decrease from 109 the year before (**figure 8**).
- Hotspots were located around Upton Park, where Green Street meets Barking Road and Central Park. The Central Park hotspot is in relation to a known group of street drinkers around the Cenotaph.

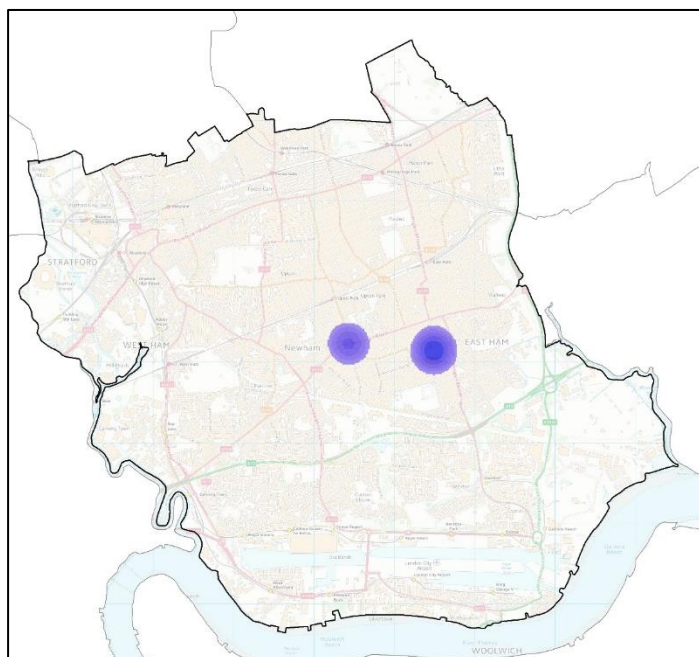


Figure 8 – street drinking complaints to the Council, hotspots in Upton Park and Central Park

Figure 9 – current PSPO signage



- The Borough has a borough wide Public Space Protection Order (PSPO) covering street drinking which is an effective tool in its own right to deal with problematic street drinking (**figure 9**). No person shall refuse to stop drinking alcohol or hand over containers (sealed or unsealed) which are believed to contain alcohol, when required to do so by an authorised officer/person. It's important to note that officers will only enforce this prohibition when people drinking alcohol are currently or likely to cause anti-social behaviour. This PSPO does not prohibit drinking in public places but gives the police and other authorised persons the power to confiscate alcohol, issue a fixed penalty of up to £100 or (if taken to court) a fine of up to £1000.
- Street drinking is a significant problem, and officer observations would imply there is an underreporting of the issue. As well as a cumulative impact policy, other more appropriate tools like the PSPO are in place to address concerns in an area where there may be problems with street drinkers, but no significant cluster of licensed premises i.e. off licences, to justify being captured in the cumulative impact area.

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Conclusions and recommendations for the 2023 CIA renewal

- Looking at the combination of alcohol related issues within Newham there are some reoccurring hotspots, as shown in **figure 10**.
- ***A CIZ needs to cover East Ham and Stratford. This has hotspots for multiple sources used in the report.***
- ***Forest Gate, Upton Park and Canning town should also be included.***
- Areas covered should not be rigid to the hotspot areas but include a few streets around it to try and protect against dispersing the problems to surrounding areas, and to provide a clear and logical boundary to the area.

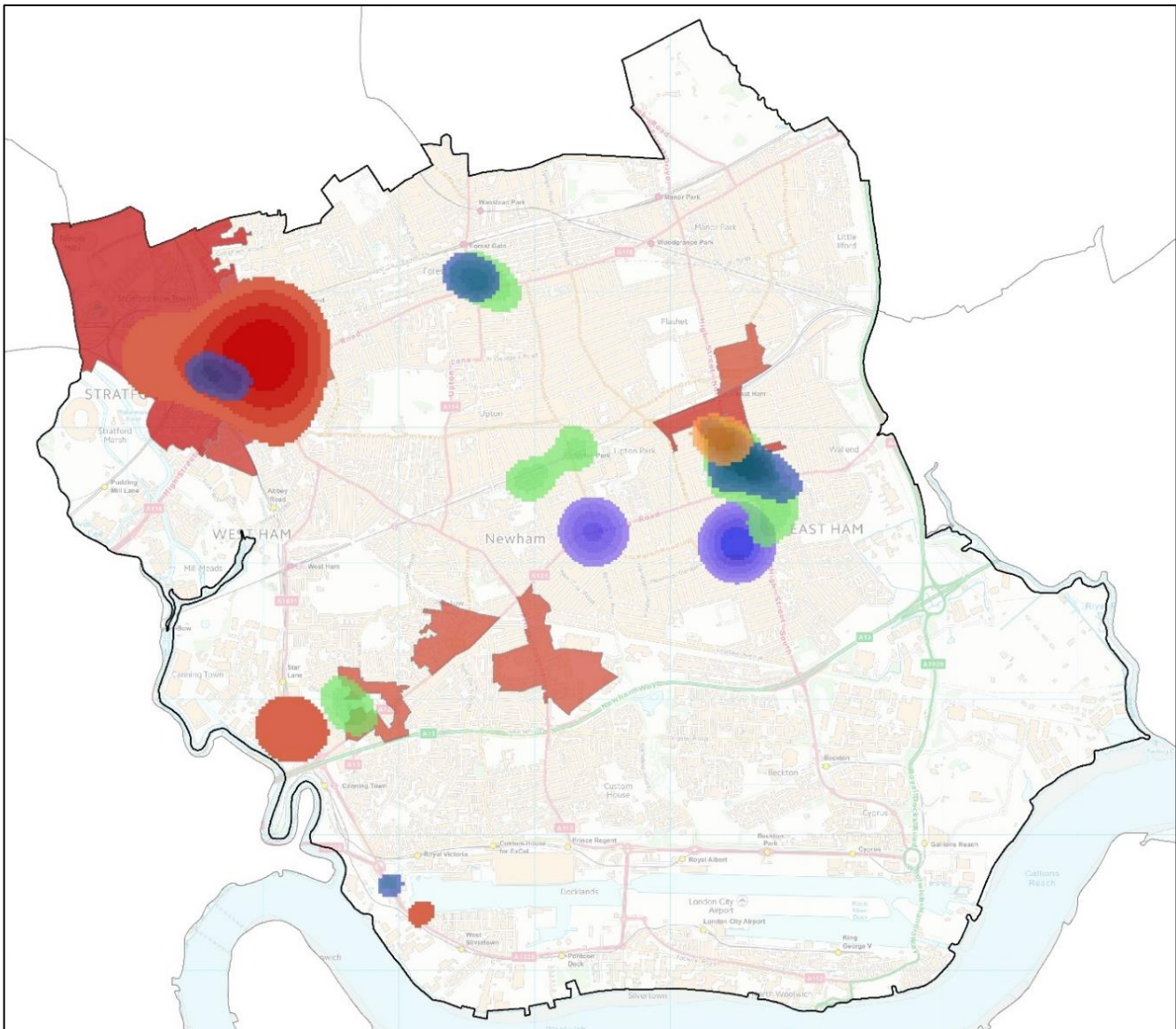


Figure 10 – combined alcohol related harms data hotspots

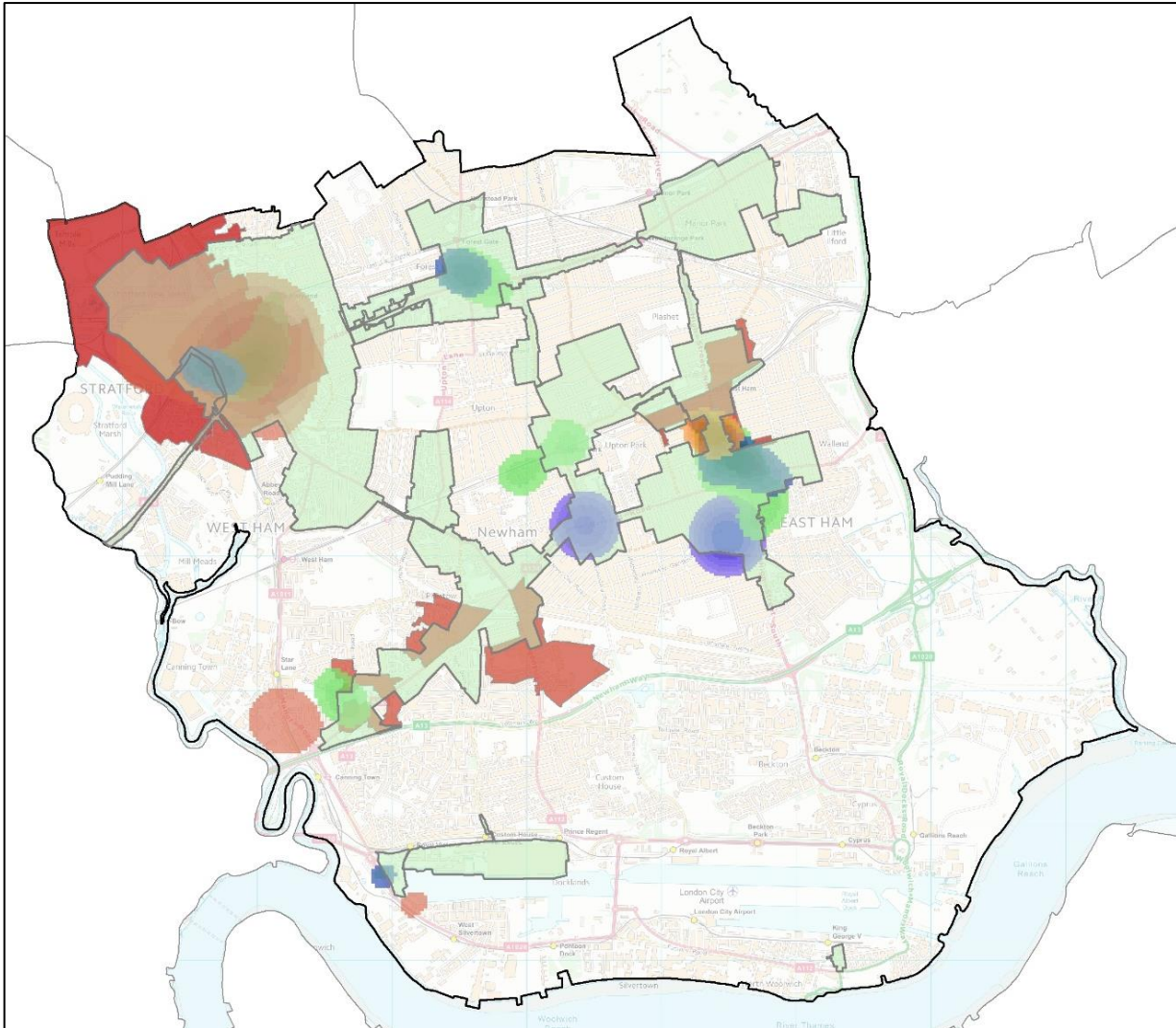


Figure 11 – overlaying the existing cumulative impact assessment over the various hotspots

- Overlaying the existing cumulative impact assessment over the various hotspots shows that most hotspots are currently within existing areas (**figure 11**).
- There are some areas that need amending. ***Canning Town has some hotspots heading towards Star Lane that are currently not within the policy and should be included.*** This covers a significant growth in licensed premises and the night time economy in this area which historically is light industrial, which has led to noise and litter complaints and safeguarding concerns especially around violence against women and girls (VAWG) reduction due to lack of street lighting and CCTV infrastructure. Over 40 CAD reports were logged from January 2023 regarding thefts and pickpockets when people are leaving night clubs around Stephenson Street and Bidder Street which resulted in joint police and licensing visits and signage put up in the area (**figure 12**).
- ***There are also significant areas that should be removed such as parts of Upton Park, North Woolwich, Plaistow, parts of Romford and Barking Road, Manor Park and particularly around the ExCel exhibition centre, which are not hotspots for any offences used in this***

analysis. If they do not contain any evidence of alcohol related disorder, then it is hard to justify their inclusion in a zone.



Figure 12 – warning signage for nightclub customers in and around Star Lane & Canning Town – a new proposed addition to the cumulative impact policy

Proposed new Cumulative Impact Assessment to be taken to consultation

- Taking all data analysis into account the proposed new area is shown in **figure 13**. This has been ***expanded to encompass the hotspots in Canning Town (Star Lane) and Upton Park*** while ***removing areas where there are no longer significant issues***. This is a ***significant shift in policy equating to around a 40% reduction in the area covered*** by the cumulative impact policy.
- This change recognises street drinking is a significant borough problem, although greatly declined in recent years thanks to effective partnership work. Other more appropriate tools like the PSPO are in place to address concerns in an area where there may be problems with street drinkers, but no significant cluster of licensed premises i.e. off licences, to justify being captured in the cumulative impact area.
- Significant areas of regeneration have been removed including of note East Village and Chobham Manor (E20), along with long stretches of commercial roads such as Barking Road and Romford Road in-between significant urban areas, and most importantly the area around the ExCel exhibition centre which is an area with the upcoming Eastern Extension to ExCel where it is envisaged there will be a growing licensed sector in the coming years.

- These changes are in line with a more progressive approach post the COVID-19 pandemic where there is a national push to support the licensed sector and the night time economy, and the areas proposed are more targeted and evidence based which increases the weighting they have and therefore their effectiveness. This approach balances the need to support business with ensuring that the licensing objectives are upheld and that residents' lives are not affected by issues such as unacceptable noise, littering and ASB.
- The licensing team in parallel to this proposed renewed CIA area will also continue to focus on mediation and pre-application advice to drive up standards, whilst freeing up resources for more effective enforcement where there are areas of non-compliance, in partnership with the licensing police and other partners.
- It is important to note that there must be an **evidential basis** for the decision to publish a CIA, hence the tight and refined overlaying of the proposed cumulative impact assessment area over the various hotspots supported by the most recent data.

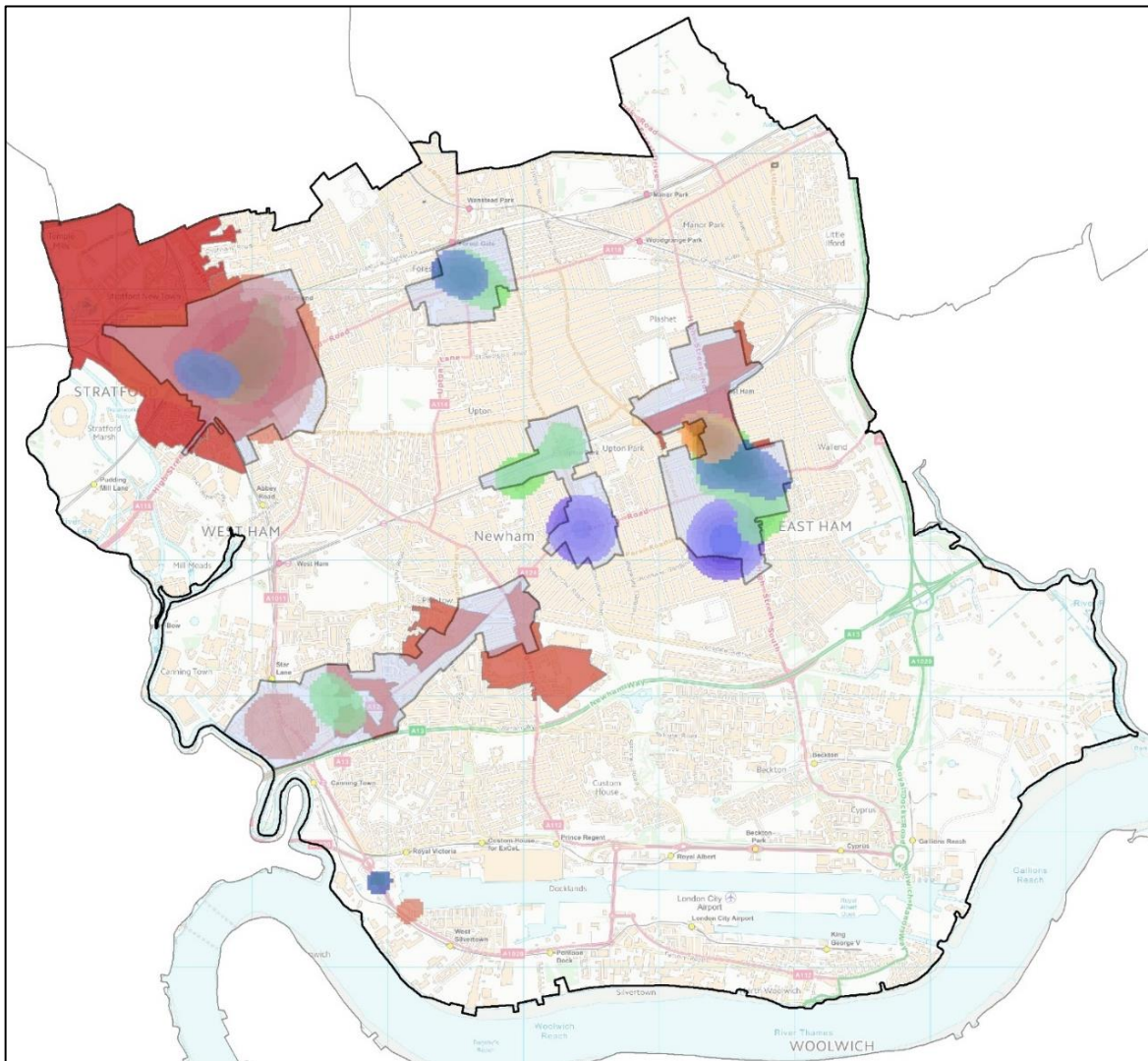
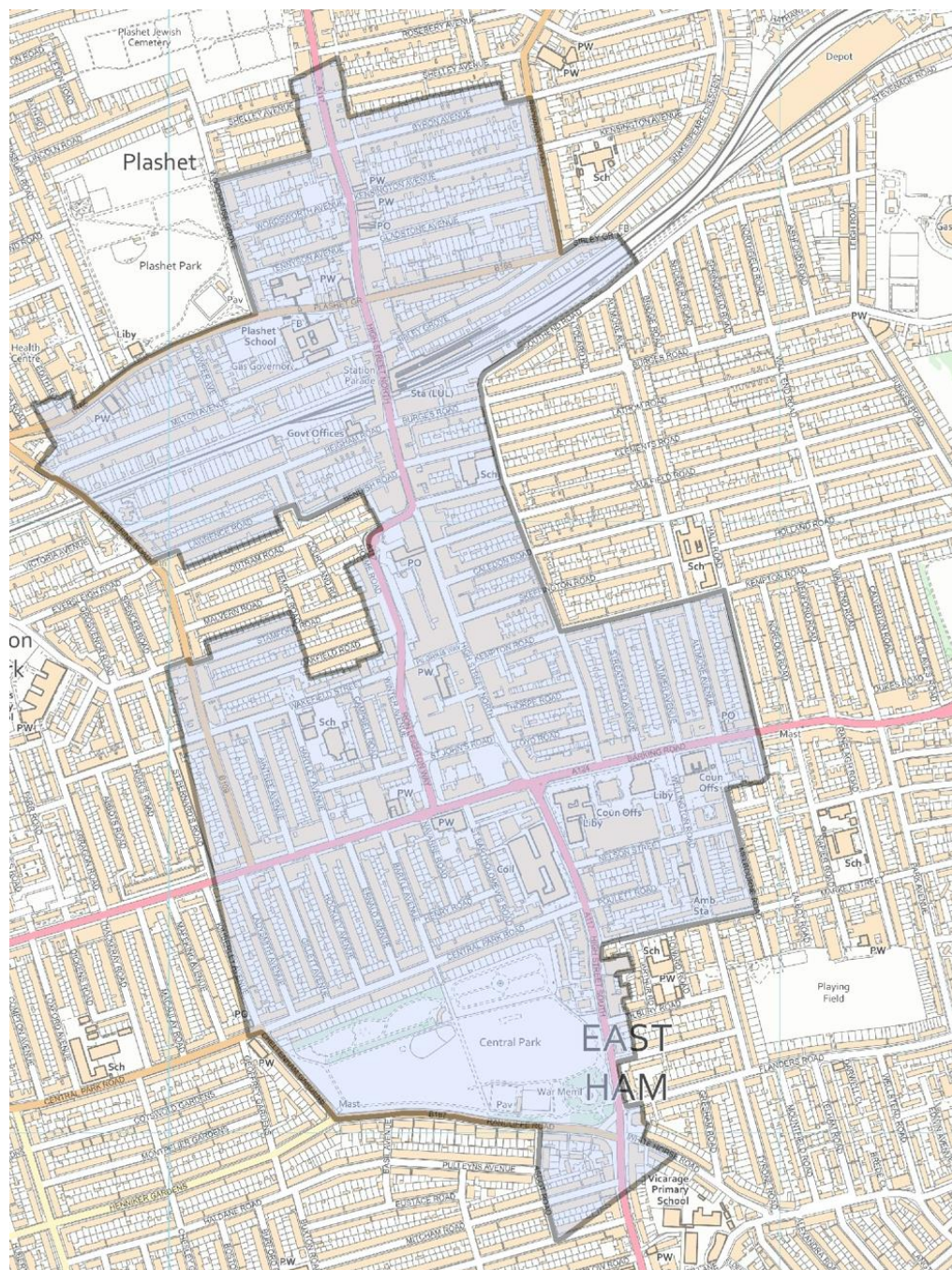
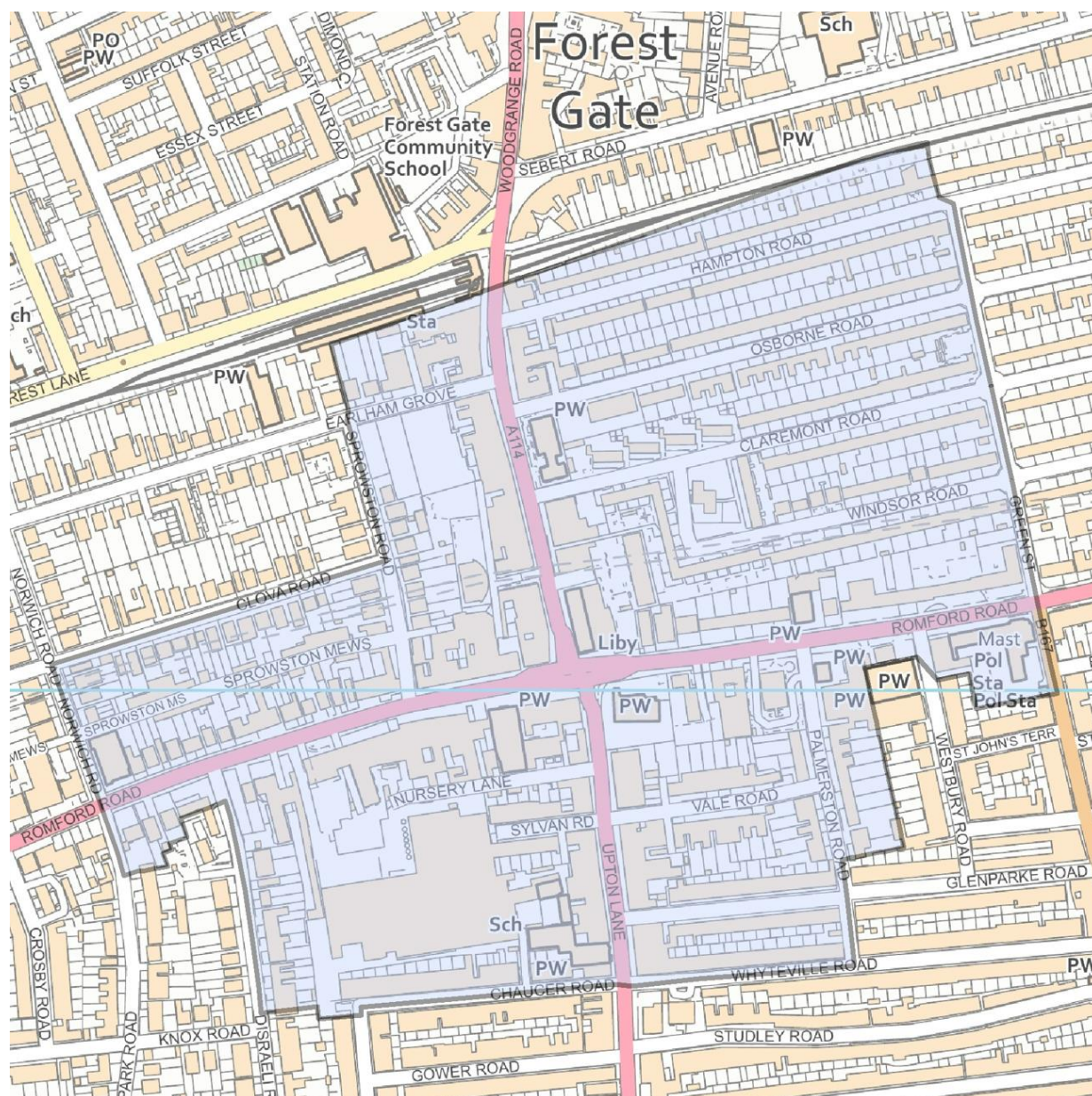


Figure 13 – the extend of the proposed CIA area. This consists of 5 distinct areas being East Ham, Forest Gate, Stratford, Upton Park and Canning Town & Star Lane

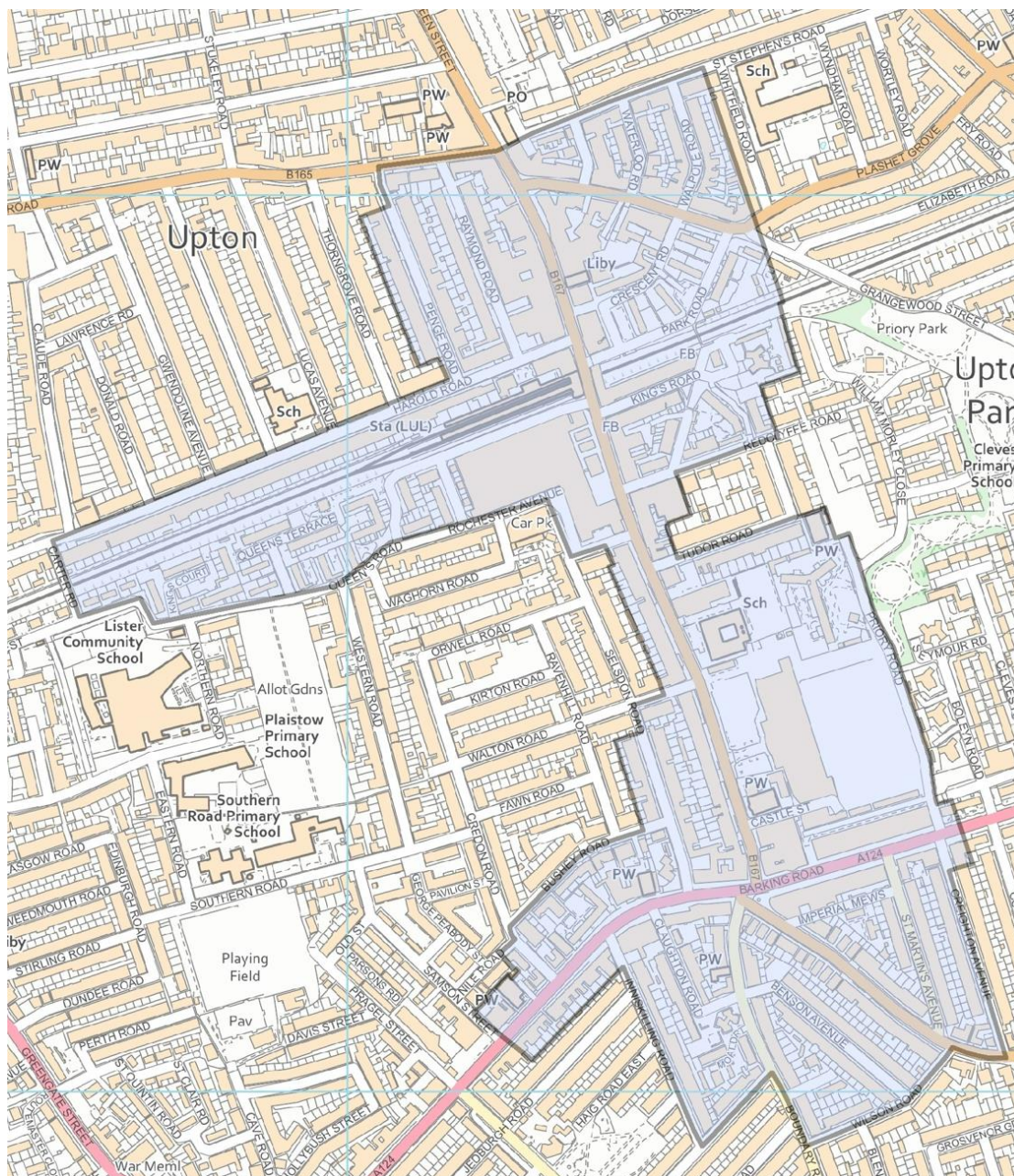
East Ham Cumulative Impact Area



Forest Gate Cumulative Impact Area



Upton Park Cumulative Impact Area



Canning Town & Star Lane Cumulative Impact Area

