

Cumulative Impact Assessment: December 2022

Part 1

Cumulative impact has been used as a term to describe the stress that a large number of licensed premises can have on crime and disorder, nuisance and the demand on local services. The statutory guidance describes cumulative impact as "...the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area." It is often not that licensed premises on their own are operating in a way that is detrimental to the licensing objectives, but it is the accumulation of the premises and the people attending them that creates the increased problems and demands on services.

Under the Licensing Act 2003 (the 'Act'), the London Borough of Croydon recognises that a significant number and type of licensed premises in a particular area may lead to problems of crime, disorder and nuisance and notes that in accordance with the Home Office Statutory Guidance to the Act, the cumulative impact of such premises on the promotion of the licensing objectives is a proper matter for the Council to consider.

As per the requirements of Section 5 of the Licensing Act 2003, the Council has published a Statement of Licensing Policy setting out how it will undertake its functions & responsibilities under the Act and paragraphs 4.17 to 4.35 inclusive and Appendices 2 to 5 in that document cover the issues of Need and Cumulative Impact – see copy of the current policy document at this link – [Statement-of-Licensing-Policy-Effective-date01-02-2023.pdf \(croydon.gov.uk\)](https://www.croydon.gov.uk/media/1000000/Statement-of-Licensing-Policy-Effective-date01-02-2023.pdf)

Cumulative impact areas in 5 parts of the borough were established in 2005 and 2013. Following a review in 2017, one of those cumulative impact areas was removed but the remaining four were retained. The one area was removed on the basis that it was no longer appropriate.

As is required, the Council undertook a further consideration of its approach to cumulative impact to decide whether any changes were required to cumulative impact areas.

In 2022, the Council was required to undertake a statutory 5 year review of its licensing policy and also undertook a review of the cumulative impact areas in existence. Data was gathered and based on that, between 4 October and 15 November 2022, the Council undertook a consultation in accordance with Section 5 but also Section 5A of the Licensing Act 2003 with proposals to maintain the current position in respect of the four existing cumulative impact areas in the Borough (cumulative impact areas 1-4) and in addition, proposed the introduction of a new, 5th cumulative impact area (CIA) in the South Norwood area. As with the other 4 existing CIA's, the new one was to be specific to premises authorised solely for the sale of alcohol 'off' the premises such as from off-licenses, shops, stores and supermarkets.

The outcome of the consultation, which supported the proposals, was reported to Licensing Committee and following consideration by the Licensing Committee on 29 November 2022 the recommendations as contained in that report were approved by the Full Council at their meeting on 14 December 2022 - see link to report here: [Agenda for Council on Wednesday, 14th December, 2022, 6.30 pm | Croydon Council](#)

Accordingly, the Cumulative Impact Areas for the Borough are as set out in the Licensing Policy and are detailed in paragraph 4.23 below and the evidence base for this is set out in Part 2 of this Cumulative Impact Assessment and at Appendices 2 to 5 of the Council's Statement of Licensing Policy

The Council has now produced and published this Cumulative Impact Assessment which refers to the relevant sections in the Council's published Statement of Licensing Policy.

Following the decision by the Licensing Committee and approval of the Statement of Licensing Policy by Full Council, both the Statement of Licensing Policy and this Cumulative Impact Assessment confirm that in light of the evidence in Part 2 and the outcome of the Consultation:

1. The Licensing Authority remains of the opinion that the number of relevant authorisations in respect of premises in the parts of its area described in the assessment as cumulative impact areas 1- 4 as part of the Statement of Licensing Policy 2023-2028 is such that it is likely that it would be inconsistent with the authority's duty under section 4(1) of the Licensing Act 2003 to grant any further relevant authorisations in respect of premises in those parts.
2. The Licensing Authority is of the opinion that the number of relevant authorisations in respect of premises in the parts of its area described in the assessment as cumulative impact area 5 as part of the Statement of Licensing Policy 2023-2028 is such that it is likely that it would be inconsistent with the authority's duty under section 4(1) of the Licensing Act 2003 to grant any further relevant authorisations in respect of premises in those parts.

For ease, the relevant sections from the policy which address cumulative impact are reproduced below –

NEED and CUMULATIVE IMPACT ASSESSMENT

- 4.17 The Council will not take 'need' into account when considering an application, as this concerns 'commercial demand' and is a matter for the planning process and the market.
- 4.18 However, the Council recognises that a significant number and type of licensed premises in a particular area may lead to problems of crime, disorder and nuisance and notes that in accordance with the Statutory Guidance to the Act, their cumulative impact on the promotion of the licensing objectives is a proper matter for the Council to consider. For example, national analysis of alcohol sales data (sales in the on and off trade) has shown a positive association at local authority level between off-trade sales and alcohol-specific hospital admissions.

4.19 Where the Council recognises that there is such a cumulative effect it will consider adopting a specific Cumulative Impact Assessment for that area, if this is shown to be necessary. Reducing availability, affordability and attractiveness are some of the most effective ways to reduce alcohol-harm and related crime.

4.20 In these circumstances, the Council may consider that the imposition of conditions is unlikely to address the apparent problems and may consider the adoption of a special policy whereby there will be a presumption that new premises licence or club premises certificate applications, or applications to materially vary a premises licence, will be refused. A material variation may be, for example, an increase in permitted hours or to add a licensable activity onto a premises licence.

4.21 Based on the Statutory Guidance to the Act, in deciding whether to adopt such a Policy in an area, the Council will consider the following:

- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots
- statistics on local anti-social behaviour offences
- the density and number of current premises selling alcohol
- Alcohol use and misuse in Croydon's population
- Claimants of benefits due to alcoholism
- Alcohol specific hospital admissions for under 18's
- Ambulance incidents and dispatches
- Alcohol related road traffic accidents
- Statistics on alcohol related emergency attendances and hospital admissions
- Mortality
- Complaints recorded by the local authority
- Evidence from local councillors and
- Evidence obtained through local consultation.

4.22 There are concerns about parts of the borough which experience high levels of alcohol related crime and alcohol related hospital admissions and where it is clear that the density of shops selling alcohol for consumption off the premises is significantly higher than in other parts of the borough.

4.23 As a result, the Council has considered it appropriate to designate, the following five areas within Croydon as being subject to a Cumulative Impact Assessment in respect of off licences and shops and supermarkets selling alcohol for consumption off the premises:

- i. Cumulative impact area 1: Along the Brighton Road; South End; High Street, George Street corridor, from the Royal Oak Centre on Brighton Road, Purley to the junction of George Street and Cherry Orchard Road in Central Croydon

- ii Cumulative impact area 2: Along the London Road/Streatham High Road corridor, in 3 sections; from the junction of London Road and Tamworth Road in West Croydon to the j/w Canterbury Road; from the j/w Broughton Road to the j/w Melrose Avenue and; from the j/w Northborough Road to the borough boundary with London Borough of Lambeth
- iii Cumulative impact area 3: Along the Brigstock Road and High Street, Thornton Heath corridor, from the junction of Brigstock Road and London Road in Thornton Heath to the junction of High Street, Thornton Heath and Whitehorse Lane
- iv Cumulative impact area 4: Along the length of Central Parade, New Addington
- v. Cumulative impact area 5: Along the length of High Street, South Norwood from the junctions with Oliver Grove and Station Road to the junction with Lancaster Road and along the length of Portland from the junction with High Street to the junction with Spring Lane, Woodside

4.24 The effect of a Cumulative Impact Assessment for each of the areas listed above is that where relevant representations are received on any new applications for a premises licence to sell alcohol off the premises, or on a material variation to an existing such premises licence there will be a presumption under the assessment that the application will be refused. A material variation would be, for example, an increase in permitted hours for the sale of alcohol or to add the sale of alcohol off the premises as a licensable activity to the premises licence.

4.25 The Cumulative Impact Assessment is intended to be strict, and will only be overridden in genuinely exceptional circumstances. However, the Licensing Authority will not apply these policies inflexibly. It will always consider the individual circumstances of each application; even where an application is made for a proposal that is apparently contrary to policy.

4.26 It is not possible to give a full list of examples of when the council may treat an application as an exception. However, in considering whether a particular case is exceptional, the Licensing Authority will consider the reasons underlying the assessment.

4.27 The Licensing Authority will not consider a case to be exceptional merely on the grounds that the premises have been or will be operated within the terms of the conditions on the licence, or that are or will be generally well managed because of the reputation or good character of the licence holder or operator. This is expected in the conduct of all licensed premises. Moreover, licences are for premises and can be easily transferred to others who intend to operate within the scope of the licence and its conditions.

- 4.28 The Council will review the assessment regularly to see whether the cumulative impact areas have had the effect intended and whether they are still needed or whether they need expanding.
- 4.29 The Council will not use this assessment and areas solely:
- As the grounds for removing a licence when representations are received about problems with existing licensed premises, or,
 - To refuse modifications to a licence, except where the modifications are directly relevant to the policy, for example where the application is for an extension in permitted hours or to add a licensable activity.
- 4.30 The Council recognises though that where no relevant representations are made in relation to an application in a cumulative impact area, the application must be granted in terms consistent with the applicants operating schedule.
- 4.31 The Council recognises that the diversity of premises selling alcohol, serving food and providing entertainment covers a wide range of contrasting styles and characteristics and will have full regard to those differences and the differing impact these will have on the local community.
- 4.32 Where an application is made for a new or transfer and variation of a licence, in respect of premises that have closed and been unused and that closure was to a relevant extent as a consequence of crime and disorder and/or nuisance issues at the premises, the Council would expect the applicant to make clear in their operating schedule how they will ensure the prevention of crime and disorder and prevention of public nuisance objectives will be met, bearing in mind any previous crime and disorder/nuisance concerns there may have been.
- 4.33 It therefore also recognises that, within the Cumulative Impact assessment areas, it may be able to approve licences that are unlikely to add significantly to the existing problems, and will consider the circumstances of each individual application on its merits.
- 4.34 The Council acknowledges that the licensing function cannot be used for the general control of anti-social behaviour by individuals once they are beyond the direct control of the licensee of any premises concerned and that apart from the licensing function, there are a number of other measures available for addressing issues of unruly behaviour that can occur away from licensed premises.
- 4.35 In recognising the importance of such measures, the Council will continue to seek further improvements to those already achieved in respect of planning controls and working in partnership with local businesses and transport operators on a number of measures to create a safe and clean environment in the following areas:
- Provision of extensive CCTV and radio communication systems

- Improvements to street lighting
- Rubbish collection and street cleaning
- Provision of better late night bus, tram, rail and taxi/minicab services
- Provision of Police Officers/street and litter wardens
- Designation of areas within the borough, as part of a Public Space Protection Order, where alcohol may not be consumed publicly and monitoring the possible need for future designations in other parts of the borough*
- Working in partnership with Croydon Borough Police on law enforcement issues relating to disorder and anti-social behaviour. These include the use of powers to issue fixed penalty notices, prosecuting those selling alcohol to people who are underage and/or drunk, confiscating alcohol from adults and children in designated areas and instant closure of licensed premises or temporary events on the grounds of disorder, or likelihood of disorder or excessive noise from the premises
- Working in partnership with Licensees and expecting them to support existing and future agreed measures set up to promote the strategic objectives for crime and disorder reduction within the Borough
- Acknowledging the powers of the police or other responsible authorities, or a local resident or business under the 2003 Act, to seek a review of the licence or certificate

*Would existing licence/certificate holders and new applicants please note that a number of areas within the borough of Croydon may lie within Public Space Protection Orders (PSPO's) that may control the consumption of alcohol in public areas. Please contact the Council's licensing team if you wish to discuss how such orders may affect licensed premises.

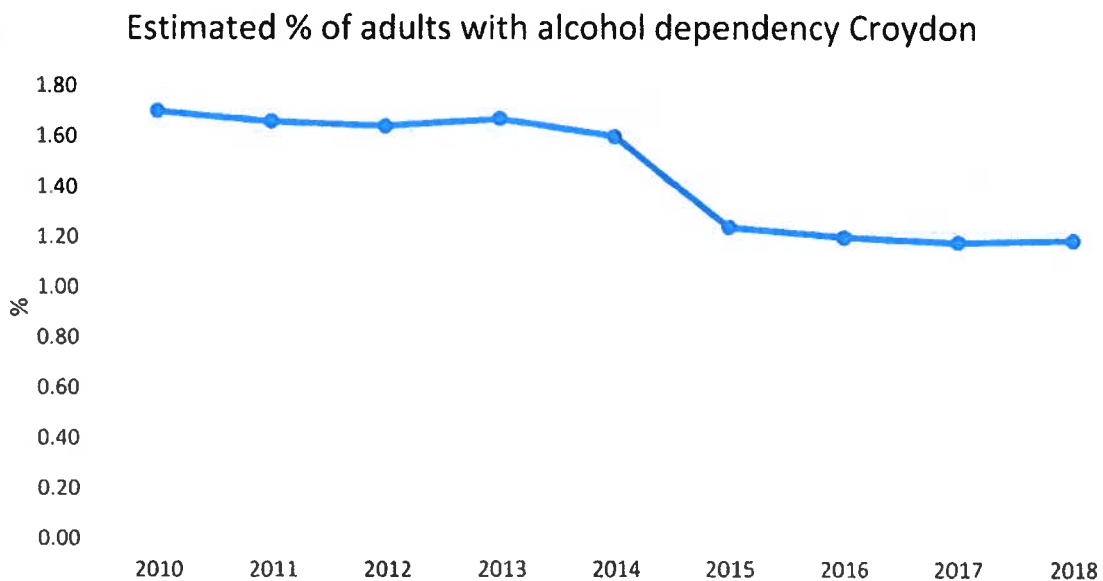
Part 2:

Evidence and Data

Alcohol use

Between 2,718 and 4,485 adults in Croydon were estimated to be alcohol-dependent in 2018-19, between 0.9% and 1.5% of the adult population¹

When looking at trend data, the estimated percentage of adults with alcohol dependency appears to have decreased in recent years.



21% of adults in Croydon abstain from alcohol. 8.6% binge drink on their heaviest drinking day and 15.8% drink more than 14 units of alcohol a week as estimated by the Health Survey for England (2015-18).²

Between 2.4%-4.6% of 15-year-olds in Croydon were regular drinkers, as estimated by The What About Youth survey in 2015.³

Off licenses

As at June 2022, there are 473 premises in Croydon licensed to sell alcohol to drink off the premises (off-licenses). This is equal to a rate of 1.95 off-license premises for every 1,000 people estimated to be living in Croydon and 2.6 per 1,000 of the adult 18+ population.⁴

¹ Public Health England. 2018-19 Estimates of alcohol dependent adults, based on 2014 Adult Psychiatric Morbidity Survey. <https://www.gov.uk/government/publications/alcohol-dependence-prevalence-in-england>

² OHID, Local Alcohol Profiles for England. <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

³ OHID, Child and Maternal Health. <https://fingertips.phe.org.uk/profile/child-health-profiles>

⁴ ONS. 2020 mid-year population estimates. Off-licence numbers taken from local council licensing team.

In 2014, a total of 1,398,180 litres of alcohol were through the off trade, this is equivalent to 4.9 litres per adult (aged 18+).²

PHE analysis of alcohol sales data (sales in the on and off trade) has shown a positive association at local authority level between off-trade sales and alcohol-specific hospital admissions. No association was found for on-trade sales.

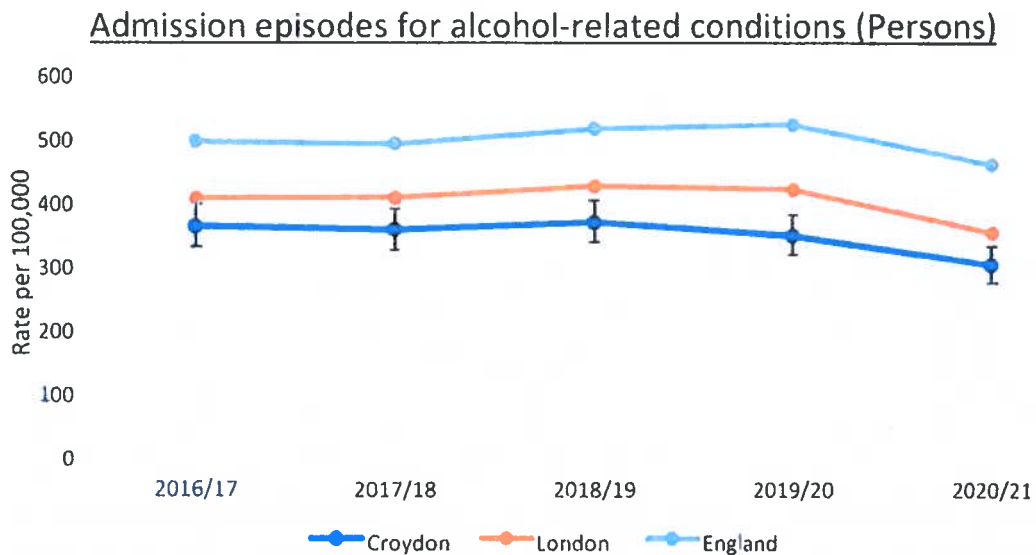
Alcohol-related Road traffic accidents²

26 road traffic accidents in Croydon in 2014-16 were alcohol related. This is a rate of 9.4 per 1,000 road accidents. This is a similar rate to London (10.7) and lower rate than England (26.4).

Hospital admissions²

In 2020/21 there were 1,051 admissions to hospital for alcohol-related conditions (narrow definition). This is a rate of 298 per 100,000 population, lower than the rates seen across England (456) and London (348). 22% of these admissions were in people under 40 years of age, 53% in people aged 40-64 years and 25% in people aged 65 or above. In all age groups the rate of hospital admissions for alcohol related conditions is higher in males than females.

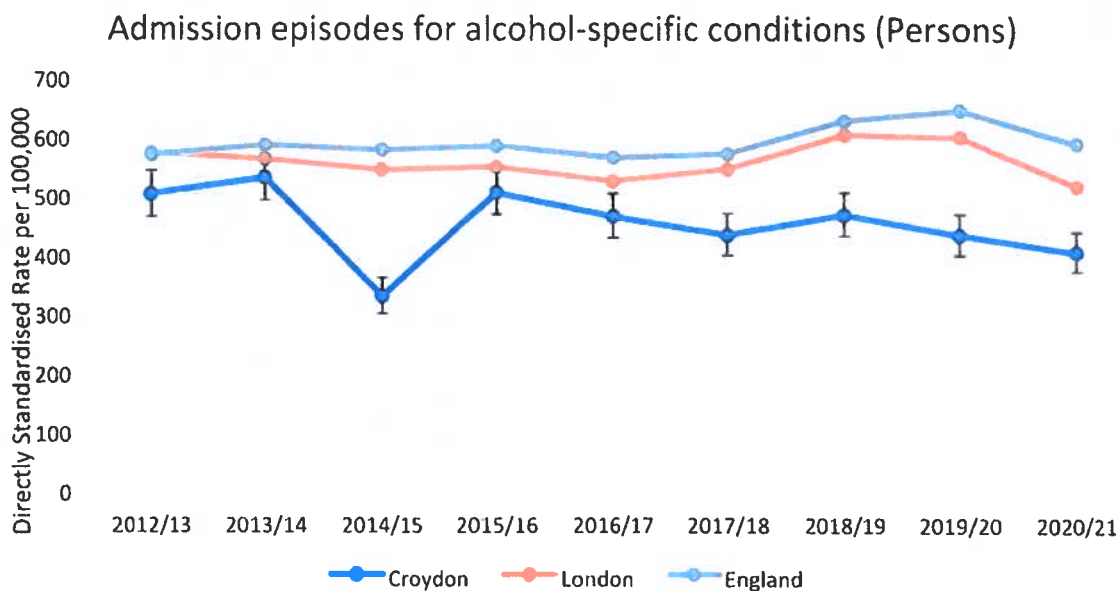
When looking at trend data admissions for alcohol related conditions in Croydon have been significantly decreasing and getting better in recent years.



<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2019estimates>

A further 1,440 admissions occurred in the same year for alcohol-specific conditions. This is a rate of 403 per 100,000 population, again lower than the rates seen across England (587) and London (515).

When looking at trend data, admissions for alcohol-specific conditions in Croydon have been significantly decreasing and getting better in recent years.



Mortality²

Latest data (2020) shows that Croydon had an alcohol-specific mortality rate of 10.6 and an alcohol-related mortality rate of 31.3. Rates are directly standardised per 100,000 population. Croydon alcohol-specific mortality rates were similar to both England (13.0) and London (9.9). Alcohol-related mortality rates in Croydon were similar to both England (37.8) and London (32.2). Alcohol-related mortality rates in Croydon were higher in males (46.9) than females (17.9) which were also similar to England and London.

When looking at trend data for alcohol specific mortality and alcohol related mortality in Croydon there is no significant change over the recent years.

Crime

Data⁵ shows that there is a strong relationship between alcohol and a range of crimes including violence. Alcohol-related crime is measured by the Metropolitan Police Service as notifiable crimes which have at least one of the following flags:

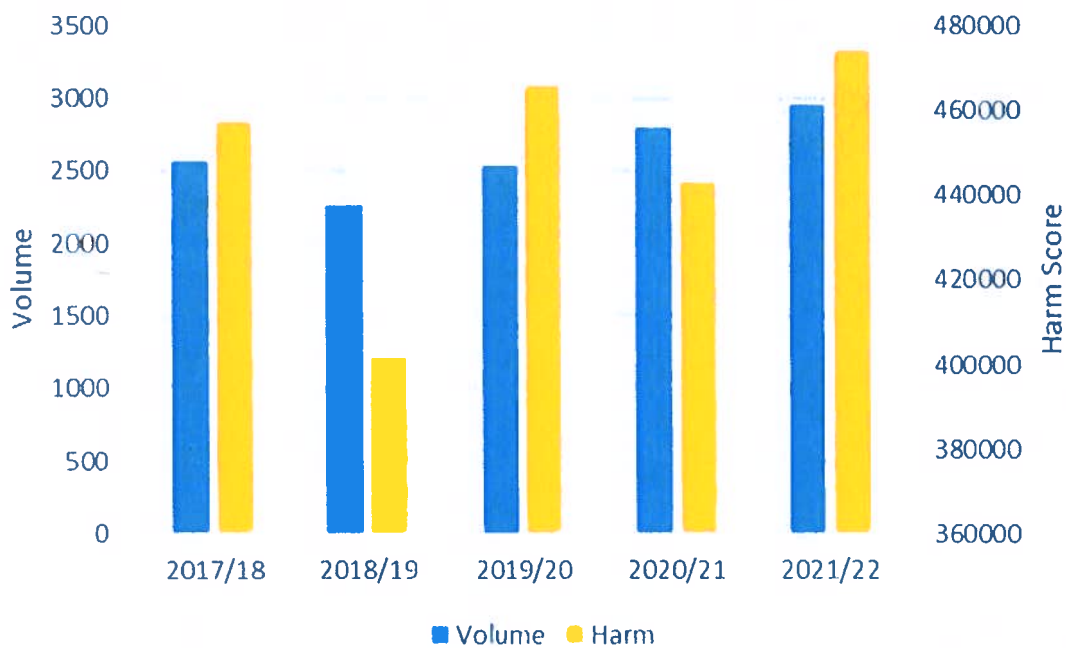
- Alcohol consumed at scene by suspect/accused.
- Suspect/accused had been drinking prior to committing offence.
- Victim had been drinking prior to the offence.

⁵ Crime Survey for England and Wales, nature of crime tables (violence)

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/natureofcrimetablesviolence>

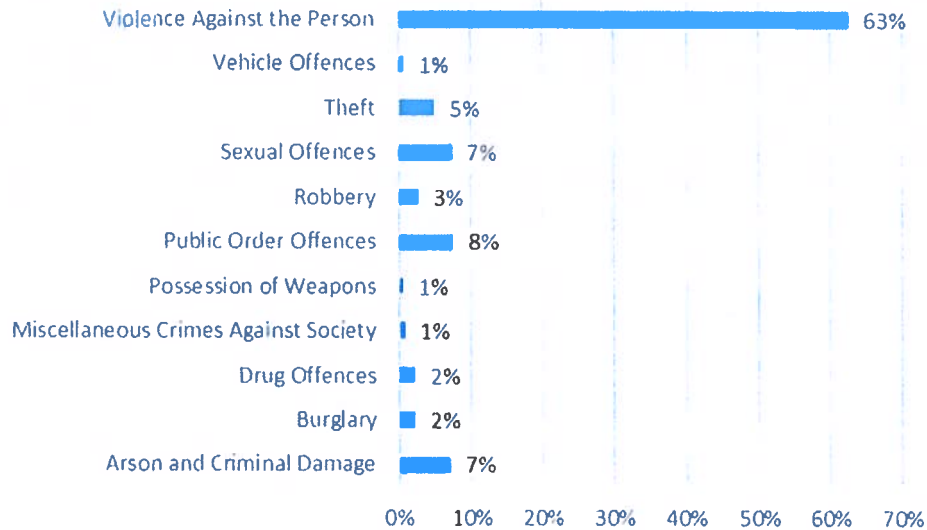
Also, there are specific alcohol-related crimes which are also included in the data (e.g., causing death by careless driving under influence of drink or drugs) and they are the only ones which are notifiable to the Home Office. As there is an issue of reliability of the above flags being recorded consistently, 'wildcards' are also used to identify crimes where alcohol featured e.g., searching for words including 'drunk', 'drinking alcohol' etc in the crime report. However, it must be emphasised that the following statistics on alcohol-related crime in the borough should be treated as the minimal number of crimes where alcohol featured.

The following graph shows the volume and harm⁶ of alcohol-related crime in the borough in the last five years. As shown there has been an overall increase in volume over the last five years and 2021/22 was the highest for alcohol-related crime. In regards to harm, even though this has fluctuated over the same period, 2021/22 was also the highest in five years.

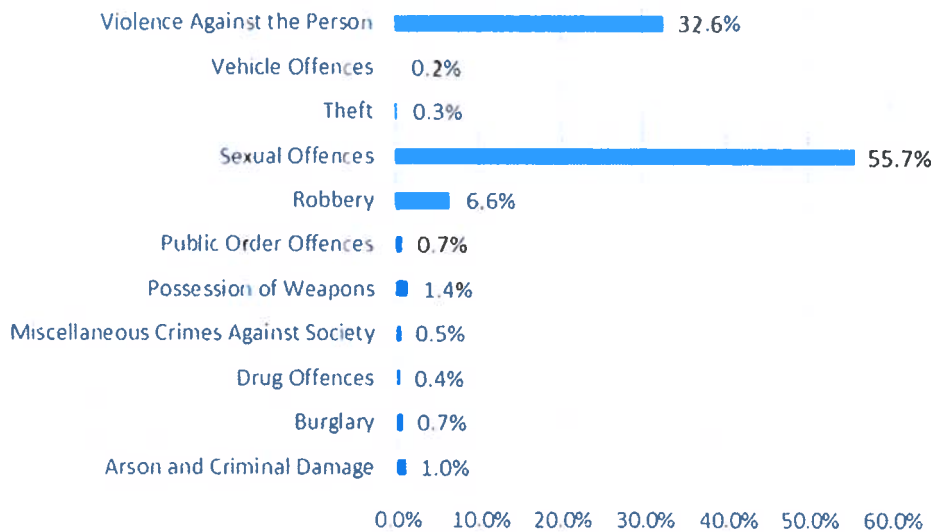


The following chart shows that over 60% of alcohol-related crime volume committed in the borough in 2021/22 was violence against the person. This is followed by 8% being public order offences.

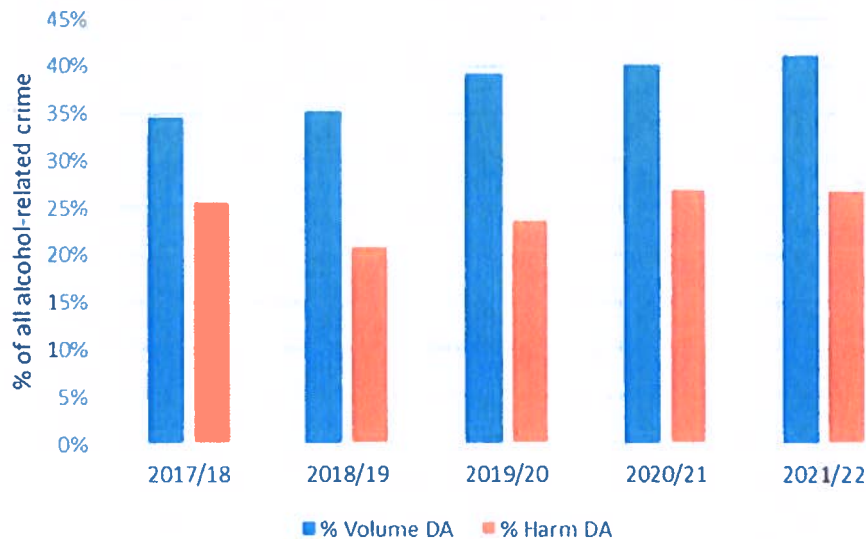
⁶ Crime Harm is measured using the Cambridge Crime Harm Index <https://www.crim.cam.ac.uk/research/thecambridgecrimeharmindex>



By looking at alcohol-related crime harm in the borough in 2021/22, over half of all harm committed were sexual offences and around a third was violence.



Alcohol-related crime is closely linked to domestic violence which has also seen higher levels of reported offences in Croydon. The following chart shows that the proportion of all alcohol-related crime volume which is flagged as domestic has been increasing year-on-year with over 40% of all crimes being domestic in 2021/22. In contrast, the proportion of all alcohol-related crime harm which was flagged as domestic as relatively stable over the last five years with it representing 27% in 2021/22.



In 2020/21, the Metropolitan Police Service recorded 34,068 crimes within Croydon, of which 11,645 were violence against the person (34.2% of all recorded crimes)⁷. The CSEW shows that, in 2017/18, 42% of the victims of violent incidents believed the offender(s) to be under the influence of alcohol. In Croydon this would result in a total of 4,891 offences of violence against the person were alcoholrelated.

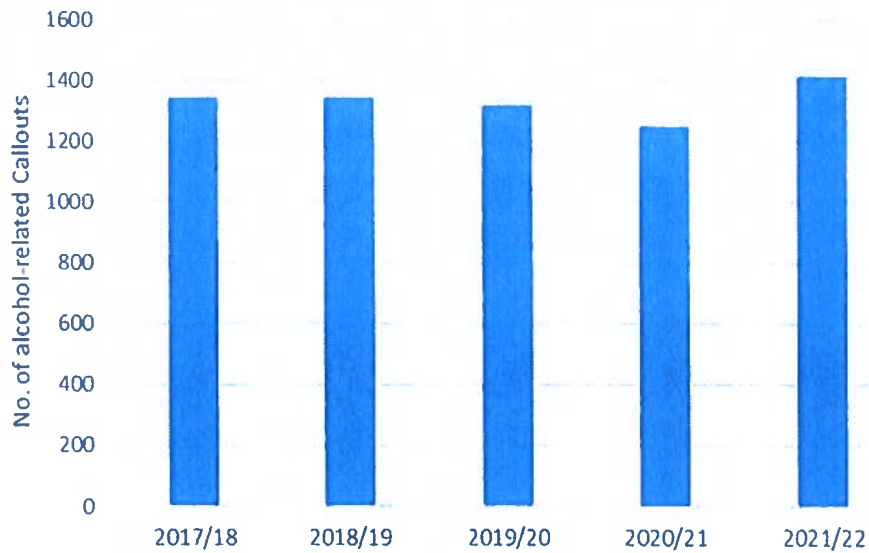
London Ambulance Service – Alcohol-related Callouts⁸

In 2021/22 there were 1,415 alcohol-related callouts to the London Ambulance Service – the highest in the last five years. Also, 2021/22 saw the only year-on-year increase over the same period with callouts rising to 13%. This large increase can be partly attributed to Covid-19 and the consequential government restrictions where many businesses were closed for substantial periods of time. Therefore, by comparing 2021/22 to 2019/20, there was still an 8% increase in callouts.

⁷ Crime Statistics in Croydon in 2021/22 published by the Metropolitan Police Service

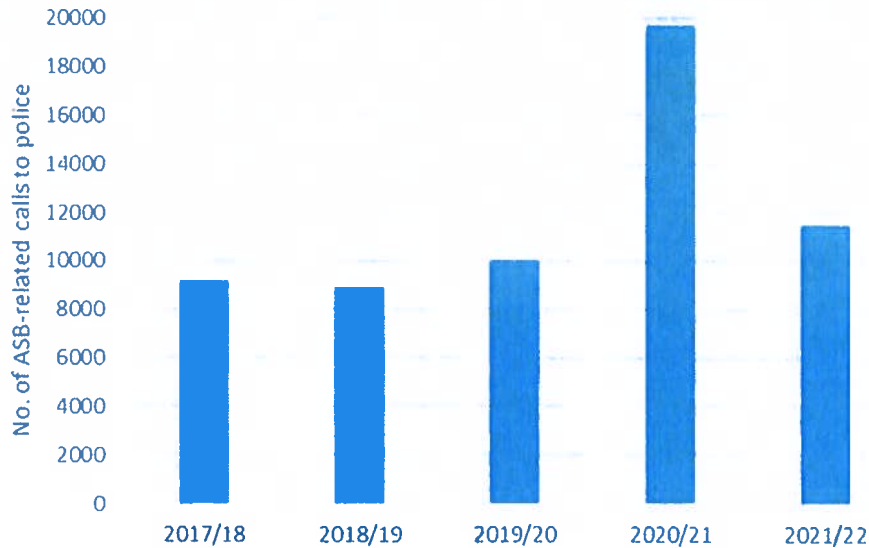
https://public.tableau.com/shared/RMW9PB8ZH?display_count=y&origin=viz_share_link&embed=y

⁸ London Ambulance Service incidents and Dispatches figures from Greater London Authority SafeStats tool, <https://www.london.gov.uk/what-we-do/research-and-analysis/safestats?source=vanityurl>. The same tool used to identify antisocial behaviour incidents from London Ambulance Service, British Transport Police, London Fire Brigade, Metropolitan Police Service and Transport for London. SafeStats contains non-official data for the purposes of operational and strategic insight and is accurate only at the point in time that it is received by SafeStats therefore there are caveats regarding the accuracy of this data.



Anti-social Behaviour⁸

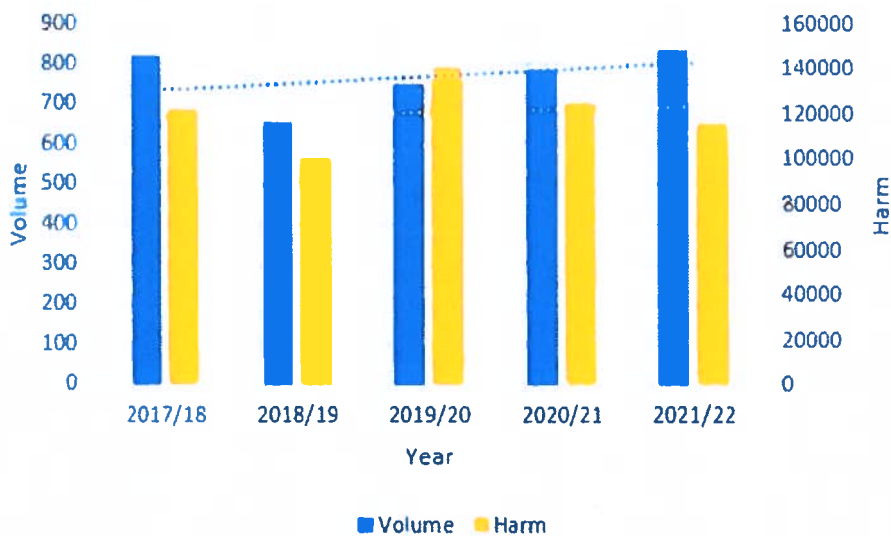
Another reliable indicator of identifying the level of alcohol-related nuisance or disorder is by looking at anti-social behaviour in the borough. In 2021/22 there were 10,087 calls of anti-social behaviour (ASB) made to the police in Croydon. This is a 42% decrease compared to the year before. However, it must be noted that incidents linked to Covid-19 restrictions are recorded as ASB (e.g. lack of social distancing, no mask wearing etc.) therefore this was the main contributor for the large number of calls in 2020/21 as shown in the following chart.



Even though Covid-19 related calls partly contribute to the number of calls in 2021/22, there were much less restrictions in place compared to the year before. Therefore, a fairer comparison is comparing 2021/22 to 2019/20, where there was a 15% increase in incidents.

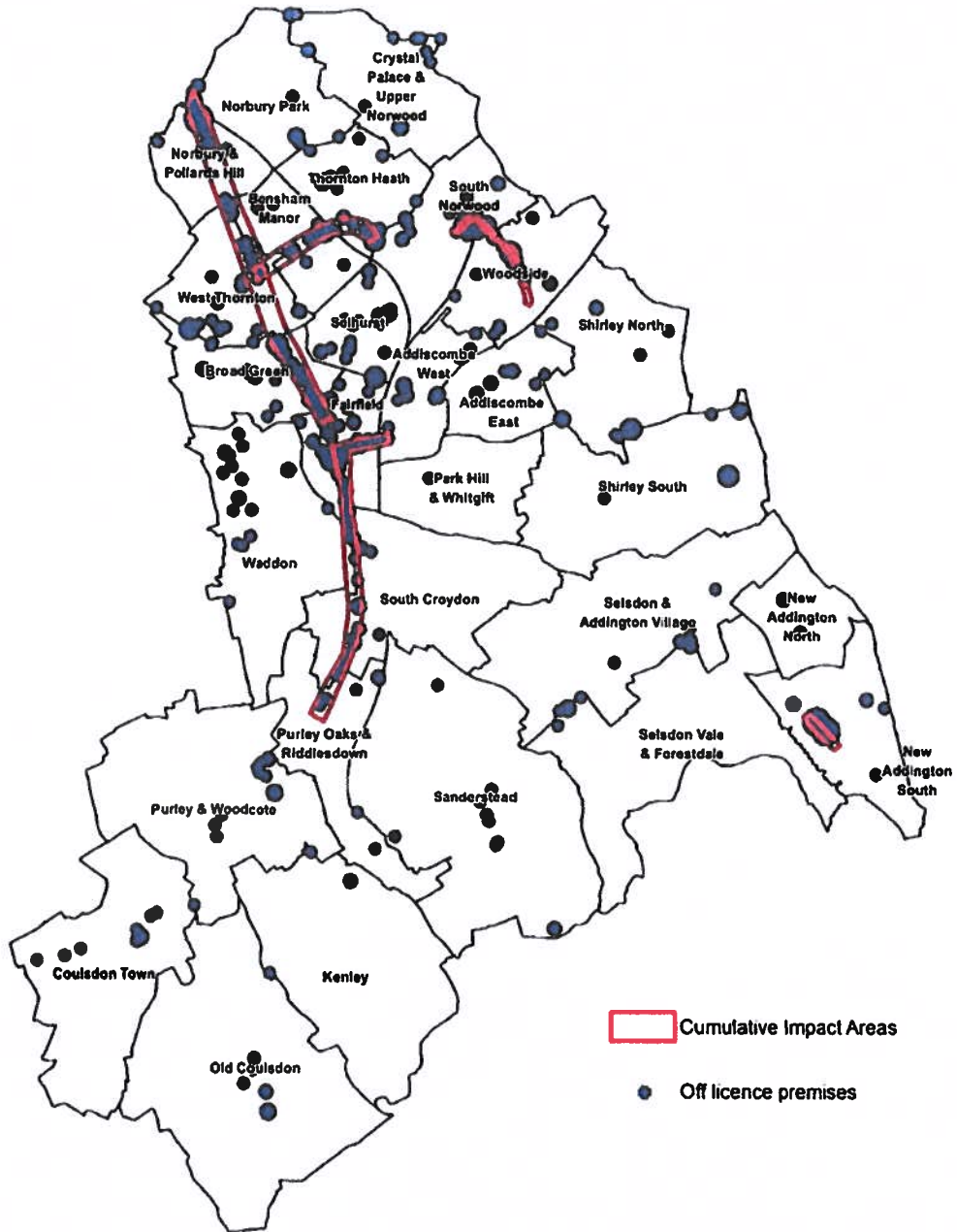
The current CIA's together have seen the highest volume of alcohol-related offences in 2021/22 in the last five years. This is measured by identifying the number of offences in a 150m area of the CIA's. The volume of offences has risen for the third consecutive year. By comparing 2021/22 to the year before there has been a 6% increase in the number of offences. By comparing 2021/22 to 2019/20 (pre-covid year) there has been an 11% increase.

By looking at harm in the current CIA's, it has fallen for the second consecutive year and it is at its second lowest in 2021/22 in the last five years. In 2021/22, alcohol-related harm dropped by 7% compared to the year and compared to 2019/20 (pre-covid year) it has dropped by a fifth (20%).



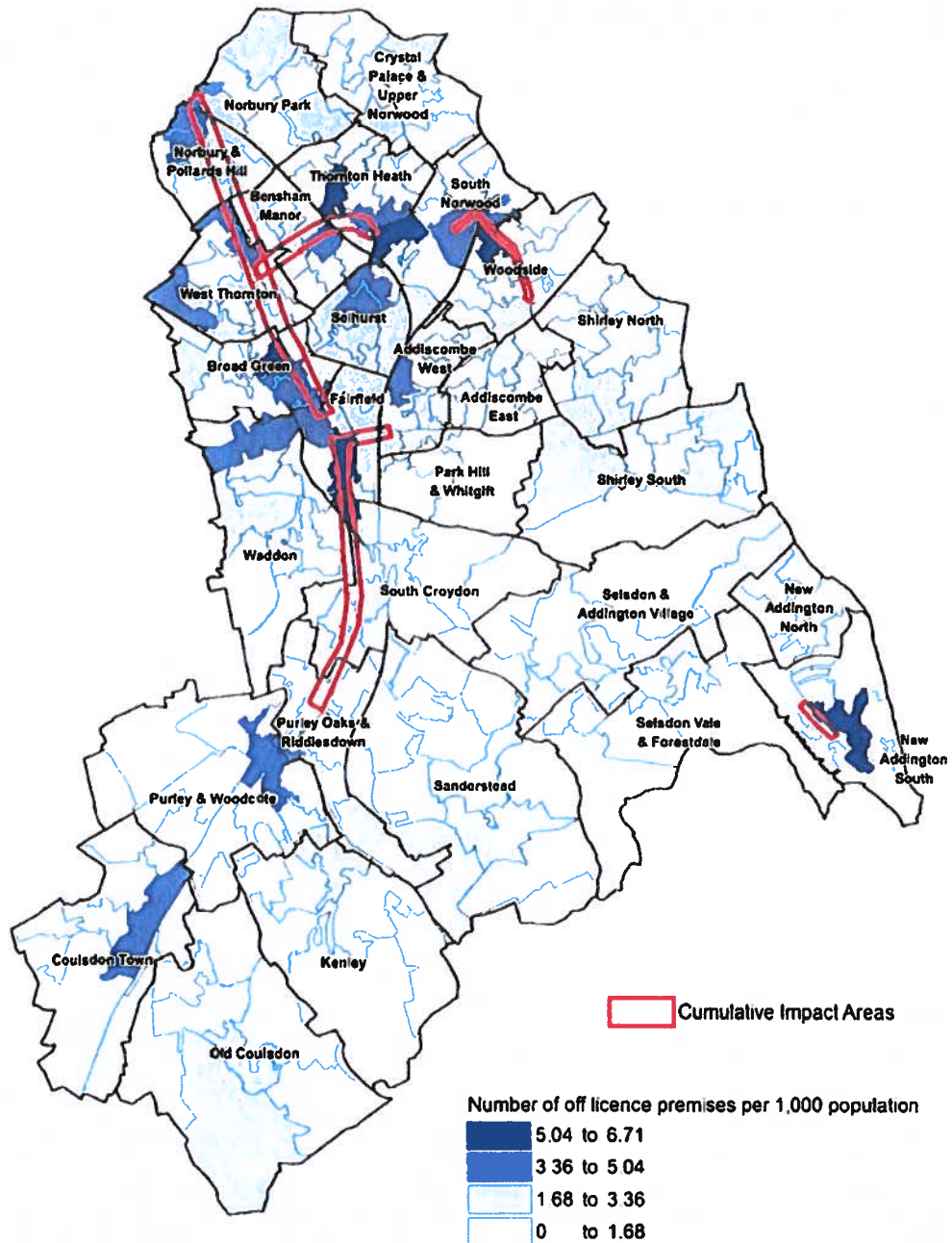
In respect of the proposed new South Norwood CIA, both alcohol-related volume and harm have been at their highest in this area in 2021/22 over the five year period. By comparing 2021/22 to the year before, volume has gone up 62% and harm has gone up 294%. By

Off Licence Premises in Croydon



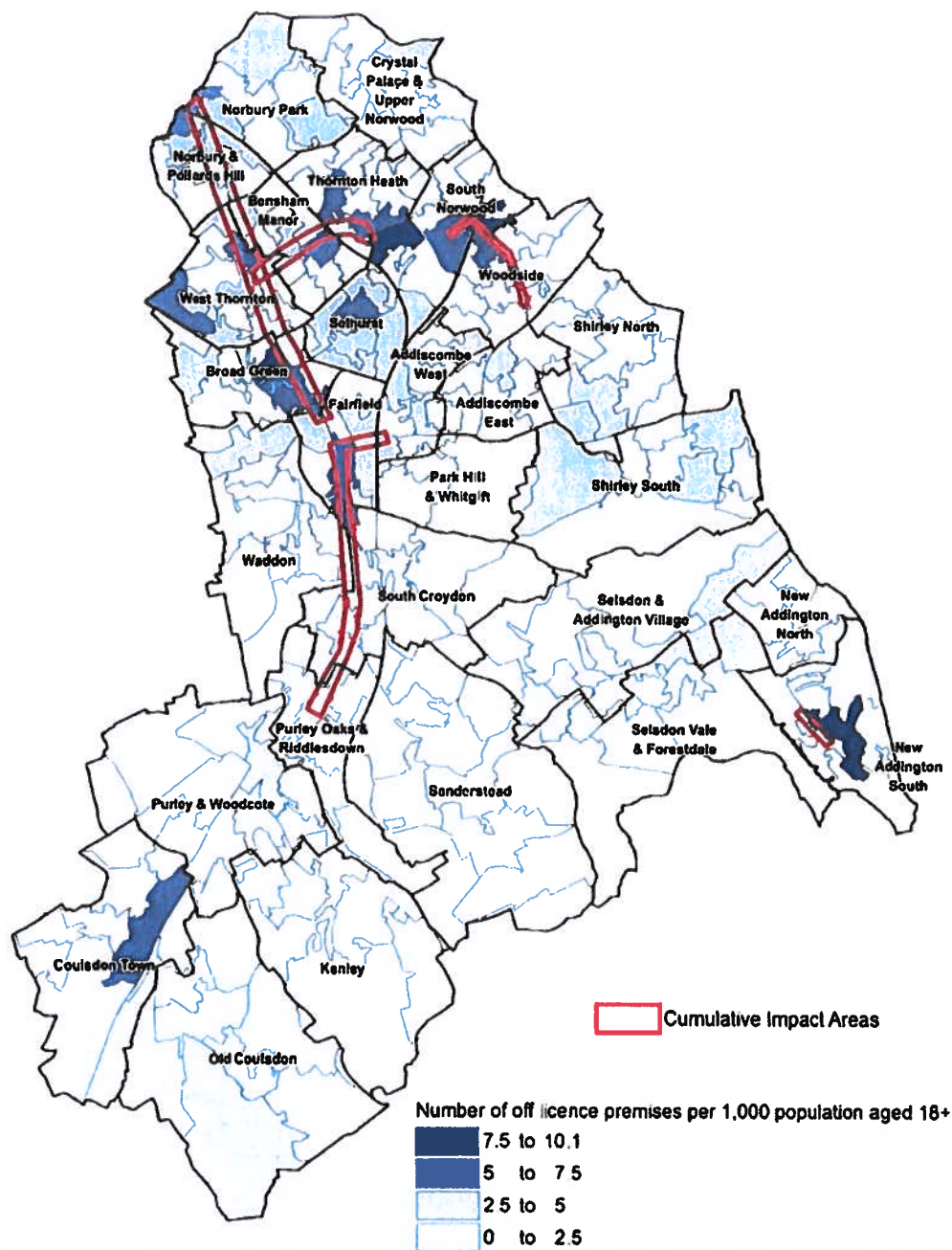
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Off Licence Premises in Croydon: rate of premises per 1,000 population



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Off Licence Premises in Croydon: rate of premises per 1,000 population aged 18+



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