

# APPENDIX B

## Brent Cumulative Impact Zone proposals

### **Purpose of the paper**

This paper outlines proposals for Cumulative Impact Zones (CIZs) in Brent. It consists of two sections

- Section 1 outlines the proposals, rationale and the process that is required for the implementation of the CIZs;
- Section 2 provides the background and summary document to be used as part of the proposed public consultation (which will take place as part of the public consultation for the Statement of Licensing Policy).

## Section 1: Outline for implementing Cumulative Impact Policies in Brent

Cumulative Impact Zones are a tool outlined in the Licensing Act 2003 to address specific issues where authorising of further licences in a specific area may undermine the promotion of the licensing objectives. As part of the review of the current Licensing Policy the Council is proposing to introduce ten (10) CIZs to address anti-social behaviour related to the sale of alcohol through off-licences.

To implement a CIZ the proposal must contain the purpose of the CIZ, the evidence to support this purpose, and clarity as to which forms of licence it relates to. There also must be a consultation with stakeholders outlined in the Licensing Act 2003 covering the following:

- (a) the reasons why it is considering publishing a cumulative impact assessment;
- (b) a general indication of the part or parts of its area which it is considering describing in the assessment;
- (c) whether it considers that the assessment will relate to all relevant authorisations or only to relevant authorisations of a particular kind.

### Proposal

It is proposed that the Council implements CIZs in the following areas (more detail for these areas and maps outlining the specific areas are in Section 2 of this paper):

- Harlesden;
- Wembley Central;
- Ealing Road;
- Kilburn High Road;
- Willesden High Road;
- Neasden Town Centre;
- Kingsbury
- Queensbury Station Parade
- East Lane; and,
- Sudbury Town – Harrow Road and Watford Road.

The Council will implement CIZs that covers:

- New applications for off-licences; and,
- Applications for variations for off-licences that lead to increased availability of alcohol (e.g. longer hours of operation, or larger premises, amongst other matters to be determined by the Council on a case by case basis).

### Rationale

The Council's current Policy came into effect 7th January 2016 at this time no Cumulative Impact Zones were identified. Since publishing the Policy there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas/neighbourhoods generating complaints from residents, councillors and the Police. This is undermining the licensing objectives. In addition, it has potential to undermine the vitality of Brent's town centres.

Data captured from various sources including alcohol related police and ambulance call outs has been mapped and shown sufficient evidence to implement CIZs in the specified areas.

In particular crime data and evidence shows a correlation between concentrations of off-licences and alcohol related anti-social behaviour.

The Licensing Policy is now being reviewed to help address the increase in alcohol related crime and harms. This provides an opportunity to implement and consult on new CIZs. Therefore, the proposal for the areas affected is to implement CIZs specifically covering the application for new off-licences or variations to existing off-licences.

## **Summary of each proposed CIZ**

### **Harlesden**

Data shows that this area has high levels of alcohol related crime and disorder and ambulance call outs. Therefore, it is proposed that a CIZ be introduced for off-licences for the following streets; Craven Park, Craven Park Road, Park Parade and High Street Harlesden.

### **Wembley Central**

Data highlights the level of alcohol related issues associated with street drinking and anti-social behaviour in this area. The presence of large capacity major events and venues can exacerbate these issues and also make the need to address them more important for the benefit of visitors and residents in this area. It is proposed that a CIZ be introduced for off-licences on Harrow Road and Wembley High Road from Waverley Ave junction of Harrow Road up the junction of Napier Road.

### **Ealing Road**

There are low level anti-social behaviour issues related to street drinking such as urination, defaecation etc. in this area. It is one of the areas where highest number of warning letters and fixed penalty notices have been issued to street drinkers. Further evidence has been provided by residents in the form of petition received during one of the licensing hearings. Therefore, it is proposed that a CIZ be introduced for off-licences on Ealing Road from the junction of High Road Wembley up to the junction of Bridgewater Road. The CIZ area includes Atlip Road, Mount Pleasant Road up to the junction of Orchard Close, Montrose crescent, Union Road and Coronet Parade.

### **Kilburn High Road**

This area is a hot spot for alcohol flagged Police call outs and high levels of alcohol related crime. Therefore, it is proposed a CIZ for off-licences be introduced along Kilburn High Road & Cricklewood Broadway from the junction of Temple Road to the junction of Cambridge Avenue.

### **Willesden High Road**

This area has high levels of alcohol related ambulance call outs as well as associated crime along its entire length. Therefore, it is proposed that a CIZ be introduced for off-licences on High Road, Willesden, NW10 from the junction of Church Road up to the junction of Walm Lane and Willesden Lane.

### **Neasden Town Centre**

There is a suitable level of evidence and justifies introducing a CIZ for off-licences. It is an area of high harm crime. It is proposed that a CIZ be introduced for the whole of the Neasden Town Centre, including Neasden Lane North, Neasden Lane, Blackbird Hill and Birse Crescent.

### **East Lane**

This area generates a large volume of complaints from residents and ward members regarding street drinking and the associated litter. In addition, there are 5/6 off-licences in a relatively small parade of shops adding to the concentration of issues. The introduction of a Public Space Protection Order for street drinking has not addressed the street drinking issues experienced by local residents. Therefore, a CIZ for off-licences is proposed for East Lane from the junction of Watford Road to the junction of Preston Road.

### **Sudbury Town – Harrow Road and Watford Road**

This relatively small town centre has a relatively high number of alcohol related ambulance call outs and anti-social behaviour. The Licensing service also receives high volumes of calls regarding street drinking. It is proposed that a CIZ be introduced for off-licences on Harrow Road from the junction of Sudbury Roundabout (adjacent to District Road) up to the junction of Chestnut Avenue, along Watford Road up to the junction of Homefield Avenue

### **Kingsbury**

Kingsbury town centre is a busy shopping parade on both sides of a main road.

Kingsbury is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour and alcohol related ambulance call outs within Brent. Recently, there has been an increase in criminality in the area where groups of people drink on the street, resulting in threatening and intimidating behaviour. This has resulted in high volumes of complaints from local residents and businesses. Therefore, it is proposed that CIZ be introduced for Kingsbury Road from Kingsbury Roundabout (including small stretch of Fryent Way) to the junction with Church Lane.

### **Queensbury Station Parade**

Queensbury Station Parade is a parade of shops, businesses and restaurants surrounding the green in an area of Medium levels of deprivation (Index of Multiple Deprivation 2015 Map 1). There are 10 licensed premises in this small parade. Residents, commuters and those using the area are confronted by large numbers of individuals drinking on the green for long periods resulting in individuals shouting, littering and urinating in front of the public (including young children attending the local nursery) etc. A large number of people looking for casual labouring work congregate on Honeypot Lane. Those individuals who are not successful in securing work for the day buy drinks from off-licences and drink on the green throughout the day. Complaints of street drinking and an unpleasant environment created by a large number of individuals has had an impact on the vitality of this small area which is surrounded by residential premises. Complaints of street drinking are high but this is not reflected in calls to police. The area is not a hotspot for violent offences but there was a murder in the reporting period.

### **Next Steps**

The next step is for the following section to be included as part of the public consultation on the Statement of Licensing Policy. The next section is also included in the Statement of Licensing Policy as Appendix 6.

## Section 2: Proposed Cumulative Impact Policies for Brent (Consultation document)

### Introduction

The Council has determined that issues relating to the sale of alcohol from off-licences, specifically relating to crime and anti-social behaviour linked with street drinking, necessitate the introduction of Cumulative Impact Zones (CIZs). The areas in which these specific issues have been identified are:

- Harlesden;
- Wembley Central;
- Ealing Road;
- Kilburn High Road;
- Willesden High Road;
- Neasden Town Centre;
- Kingsbury
- Queensbury Station Parade
- East Lane; and,
- Sudbury Town – Harrow Road and Watford Road.

### What is a CIZ?

Cumulative Impact Zones are a tool outlined in the Licensing Act 2003 to address specific issues where the authorising further licences in a specific area may undermine the promotion of the licensing objectives.

A CIZ is an area in which any new licence or variation to an existing licence that increases the scope for the sale of alcohol within the specified area will not be granted unless the applicant can evidence that the operation of the licence or licence variation will not contribute to the issues identified in the CIZ.

The effect of adopting a CIZ is to “create a rebuttable presumption” that applications for licences which are likely to add to the existing cumulative impact will normally be refused (or subject to certain limitations) unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives. CIZs have proved to be a useful tool for tackling alcohol related crime and anti-social behaviour for other licensing authorities. In May 2017, Parliament noted that there are now over 200 cumulative impact policies in England and Wales.

### Why have CIZs in Brent?

The Council’s current Licensing Policy came into effect 7th January 2016. Crime and complaints assessments in 2015, did not identify any requirement for a CIZs. However, since 2016 there has been a significant and notable increase in alcohol related crime and anti-social behaviour which is having an adverse impact in some areas and neighbourhoods generating complaints from residents, councillors and the Police. This is undermining the licensing objectives and also has potential to undermine the vitality of Brent’s town centres.

Data captured from various sources including alcohol related police and ambulance call outs have been mapped and have shown suitable evidence to implement CIZs in the specified areas. In particular crime data and evidence shows a correlation between concentrations of off-licences and alcohol related anti-social behaviour, particularly that associated with street drinking.

## Which types of licences will this effect?

The proposed CIZs will only affect applications that relate to off-licences or variations to existing off-licences. This is specifically to address the public nuisance and crime and disorder objectives that are caused through activities such as street drinking

## The proposed CIZ areas

### *Harlesden*

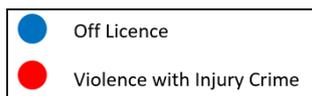
Harlesden town centre consists of a series of parades of shops that run along Craven Park, Craven Park Road, Park Parade and High Street Harlesden. The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough.

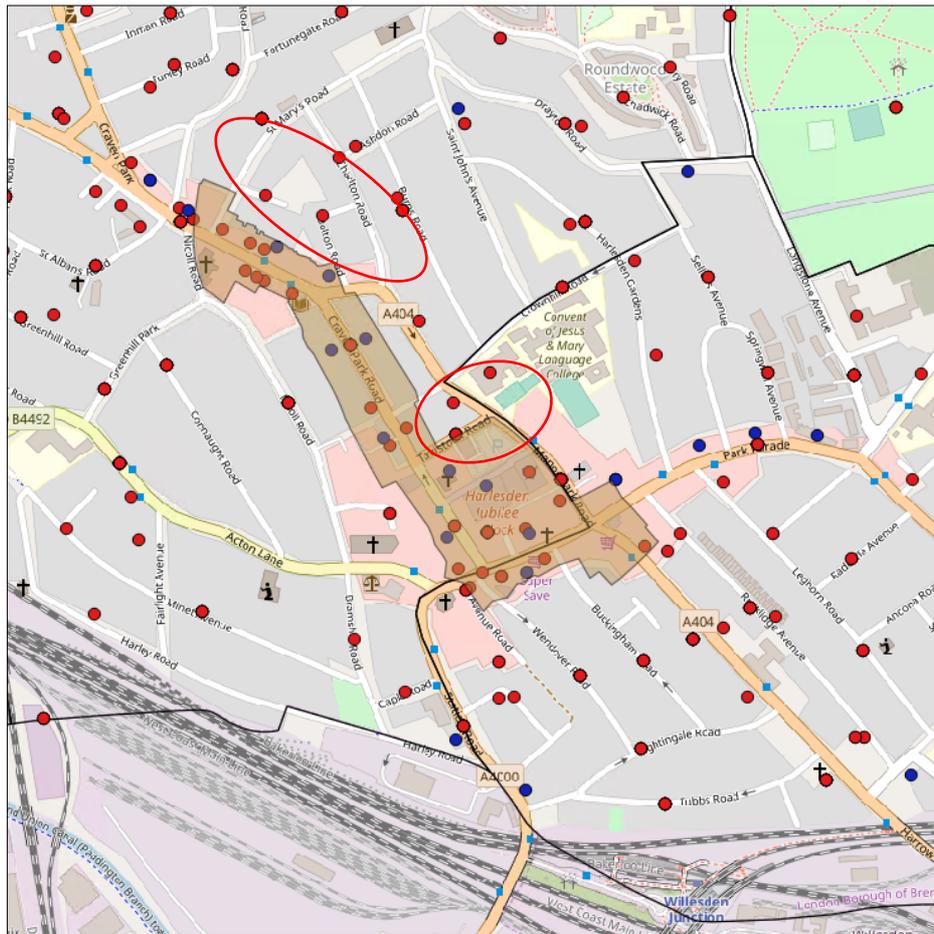
Harlesden Town Centre is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour. It is also a hotspot for ambulance calls where the victim has sustained an injury. The data shows the whole of the town centre suffers from high levels of alcohol related issues, including residential street off the main town centre such as Rucklidge Avenue, Wendover Road, Buckingham Road and St Albans Road.

In the last 2 years there have been 156 violence with injury crimes in Harlesden Town Centre at an average of 6.5 crimes per month. This number counts only the incidents within the town centre as illustrated below. There are many more crimes around the perimeter of this area.

Harlesden Town Centre is also the primary hotspot for reports of street drinking to police. All other town centres in Brent suffers from street drinking; however, in parts of Harlesden such as Craven Park Road and High Street, the street drinking interrelates with street prostitution, drug misuse and violent crime.

The below map shows violence with injury crimes, and off licences in Harlesden (01/06/2017 to 31/05/2019):





The upper area highlighted in red show clusters of violent crimes around off licences on Craven Park, Craven Park Road, Park Parade, Station Road, Manor Park Road, Harlesden High Street, Harrow Road up to the junction of Kilburn Lane. The lower highlighted area shows a high concentration of off licences in the High Street area and violent crimes around them.

The streets to be included in Harlesden are:

- Craven Park Road
- Craven Park
- Nicoll Road
- High Street
- Park Parade
- Manor Park Road

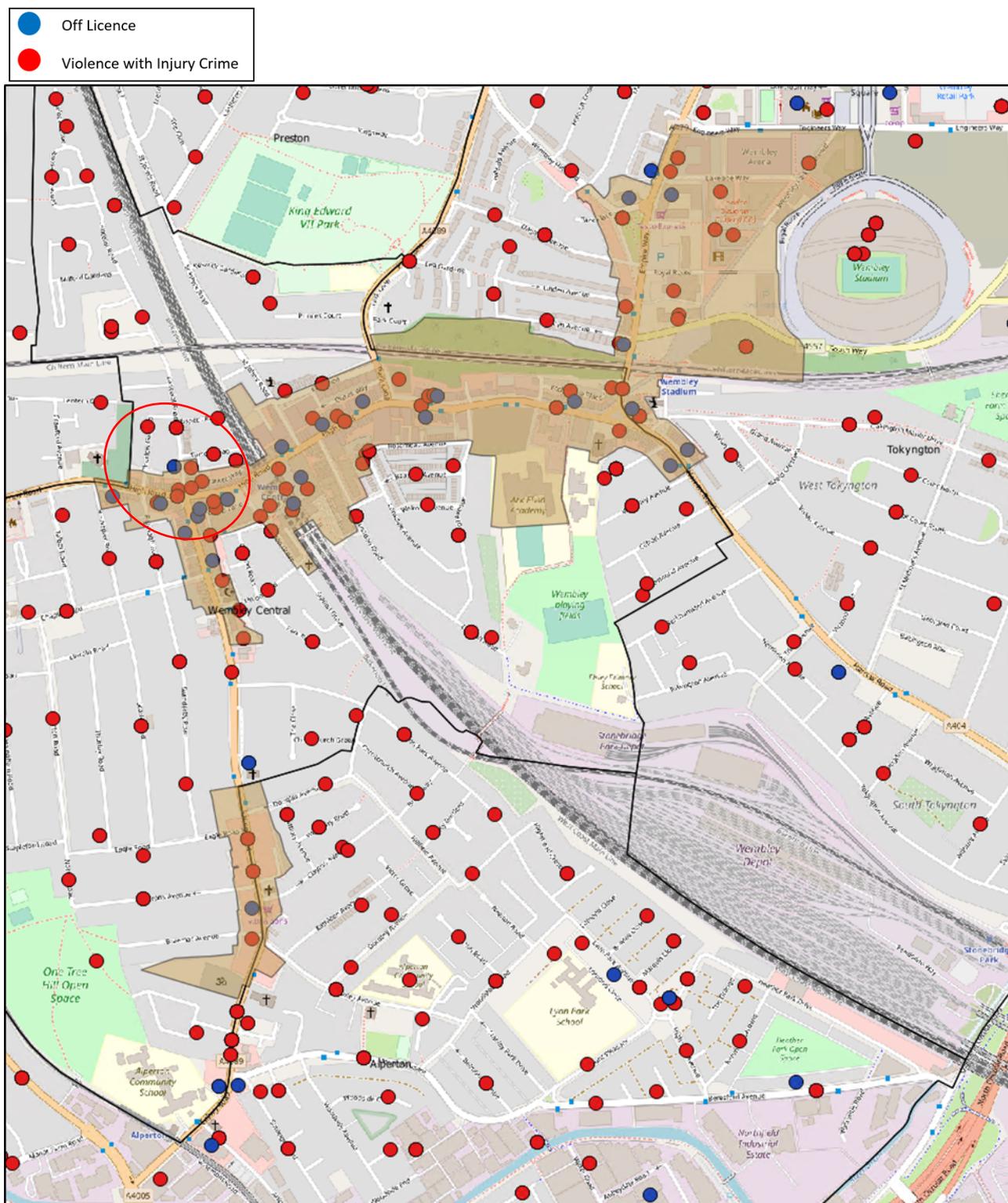
### ***Wembley Central (Wembley High Road/North End of Ealing Road)***

Wembley Central is a ward which includes two busy shopping parades on Wembley High Road and the north end of Ealing Road. Wembley central has areas of low to medium levels of deprivation.

Wembley Central is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour, and to the ambulance service for call outs. The data shows the whole of the High Road from Ealing Road to Wembley Triangle experiencing high levels of alcohol related issues.

In the last 2 years there have been 267 violent crimes in Wembley Central at an average of 11 crimes per month.

The below map shows violence with injury crimes, and off licences in Wembley (01/06/2017 to 31/05/2019)



The area highlighted in red shows clusters of violent crimes around off licences around the junction of Wembley High Road and Ealing Road. This is an area known for problematic street drinkers. It also has a high concentration of off licences.

The streets to be included in Wembley Central are:

- High Road
- Lancelot Road
- Harrow Road
- Empire Way
- St John's Avenue
- Park Lane
- London Road
- Central Square

### ***Neasden Town Centre***

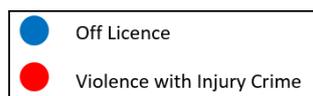
Neasden town centre consists of a medium sized parade of shops that run along Neasden Lane which is just off the North Circular Road. The town centre is primarily in Dudden Hill ward and in an area of medium to high levels of deprivation.

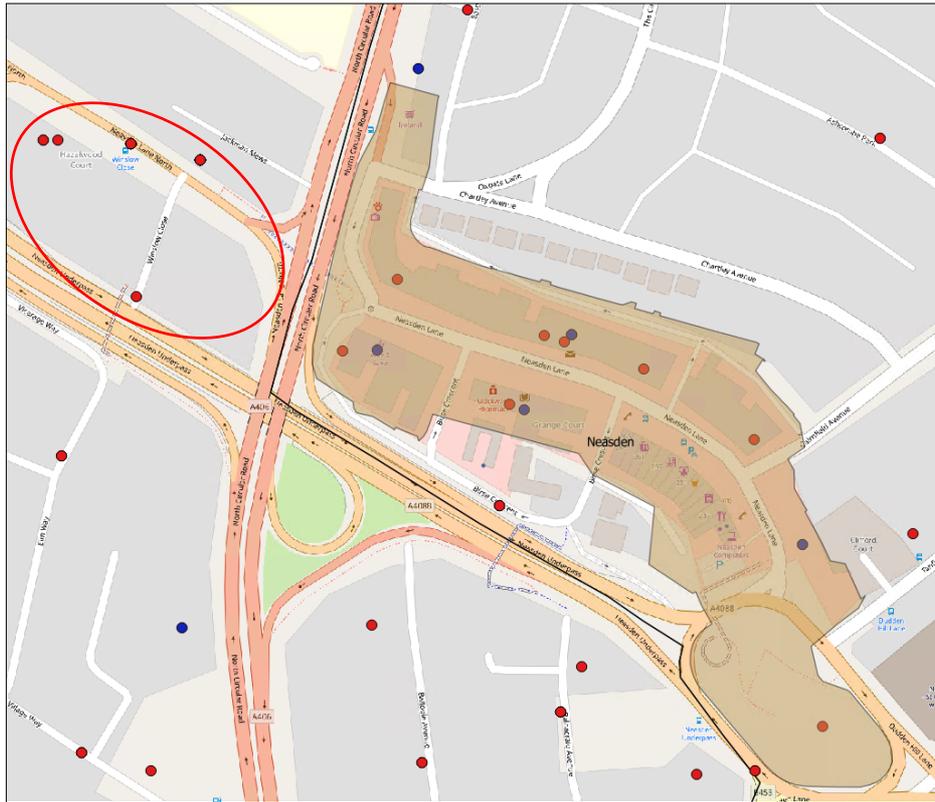
Neasden Town Centre is a hotspot for alcohol flagged calls to the Police but not for crime and anti-social behaviour. However, Neasden Lane North, just outside the town centre, is a hotspot for both.

In the last 2 years there have only been 9 violence with injury crimes in Neasden Town Centre at an average of less than 1 crime per month. However, there have been many more violent crimes in the areas surrounding the town centre such as Neasden Lane North.

Changes in demographics in Neasden have seen a change in the street drinking profile, which ranges from social to problematic street drinking.

The below map shows violence with injury crimes, and off licences in Neasden (01/06/2017 to 31/05/2019)





The streets to be included in Neasden Town Centre are -

- Neasden Lane
- Neasden Lane North
- Blackbird Hill
- Birse Crescent

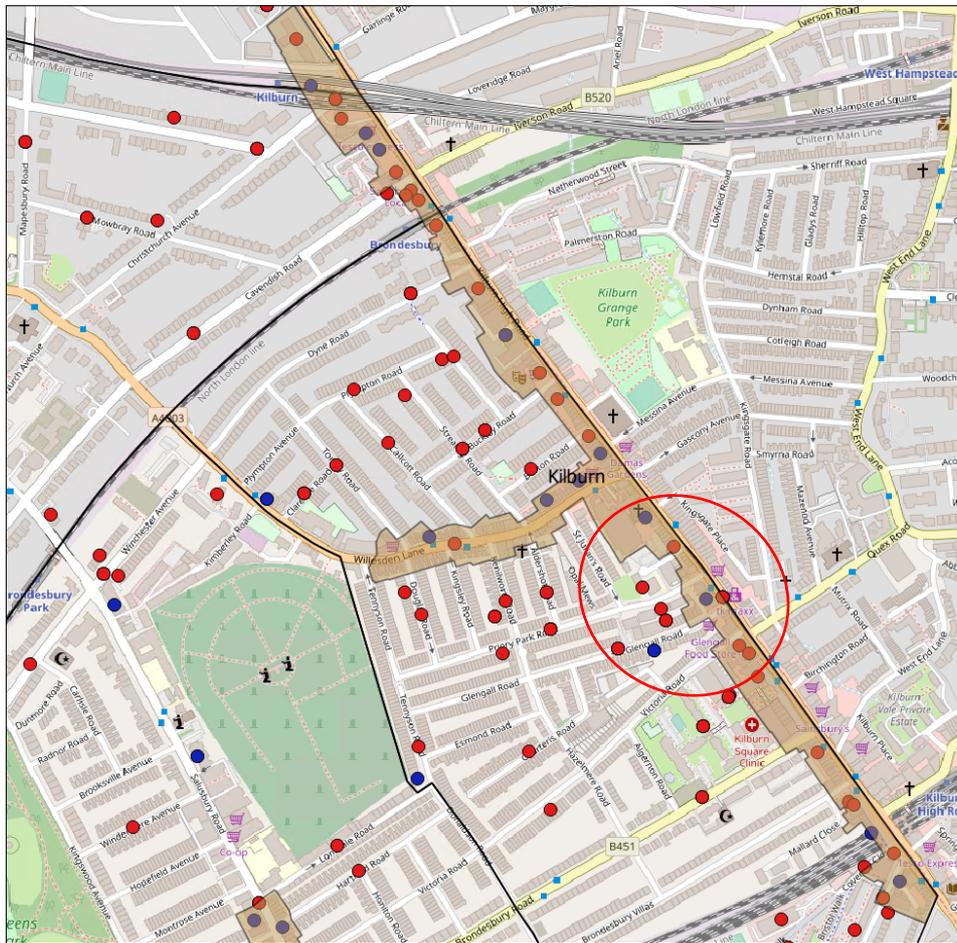
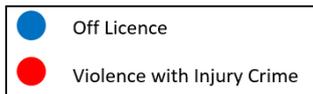
### ***Kilburn High Road***

Kilburn High Road is a busy large shopping parade, which runs along the border of Brent and Camden. Kilburn High Road is predominately in an area of medium levels of deprivation apart from South Kilburn Estate, which has high levels of deprivation

Kilburn High Road is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour, and to the ambulance service for call outs. The data shows the alcohol related issues are primarily between the junctions of Willesden Lane and Victoria Road with Kilburn High Road and where high numbers of Police and ambulance calls are present.

In the last 2 years there have been 36 violence with injury crimes in Kilburn High Road at an average of 1.5 crimes per month.

The below map shows violence with injury crimes, and off licences in Kilburn (01/06/2017 to 31/05/2019)



The streets to be included in Kilburn are:

- Kilburn High Road
- Glengall Road
- Willesden Lane
- Cambridge Avenue
- Priory Park Road

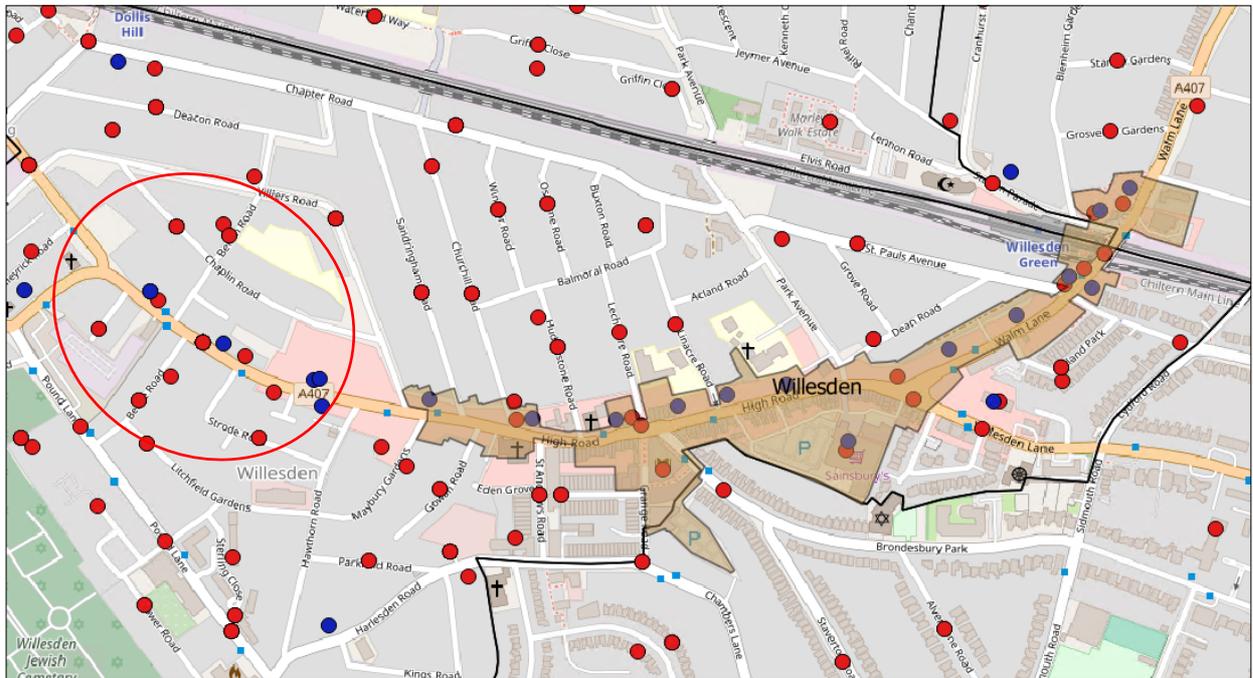
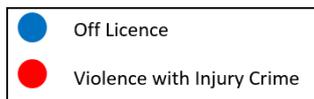
### ***High Road, Willesden***

High Road, Willesden is busy large parade of shops in Willesden Green Ward. High Road, Willesden is in an area of medium to high levels of deprivation.

High Road, Willesden is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour, and to the ambulance service for call outs. The data shows the alcohol related issues are primarily just outside the town centre around the junction of High Road, Willesden and Pound Lane where high numbers of alcohol related police calls are present.

In the last 2 years there have been 37 violent crimes in High Road, Willesden at an average of 1.5 crimes per month.

The below map shows violence with injury crimes, and off licences in Willesden (01/06/2017 to 31/05/2019)



The streets to be included in High Road, Willesden are:

- High Road
- Chapter Road
- Dudden Hill Lane
- Walm Lane
- Station Parade
- Willesden Lane

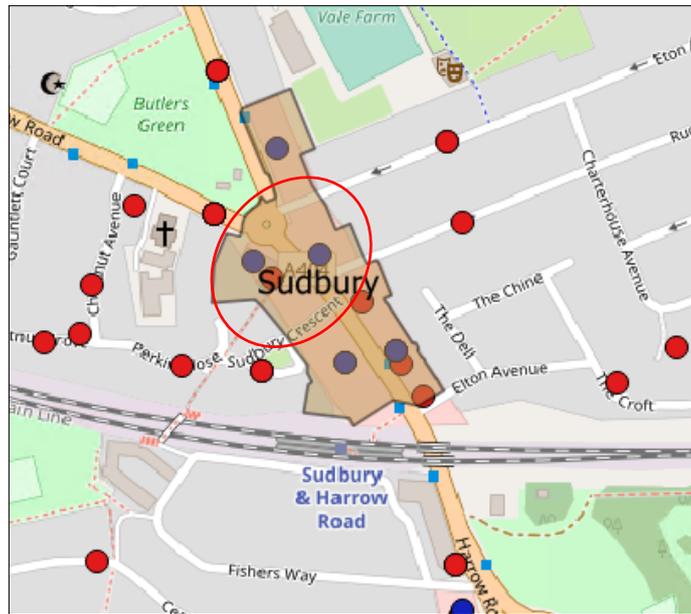
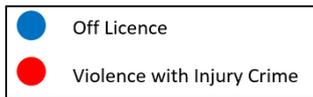
### **Sudbury Town Centre**

Sudbury Town Centre is a medium sized shopping parade in an area of low levels of deprivation.

Sudbury Town Centre is a minor hotspot for alcohol related police calls within Brent. Calls are generally related to the area from the roundabout at Butler's Green to the junction of Sudbury Crescent and Harrow Road.

High harm crime is low, in the last 2 years there have been 4 violence with injury crimes in Sudbury Town Centre.

The below map shows violence with injury crimes, and off licences in Sudbury (01/06/2017 to 31/05/2019)



The streets to be included in Sudbury Town Centre are:

- Harrow Road
- Watford Road
- District Road

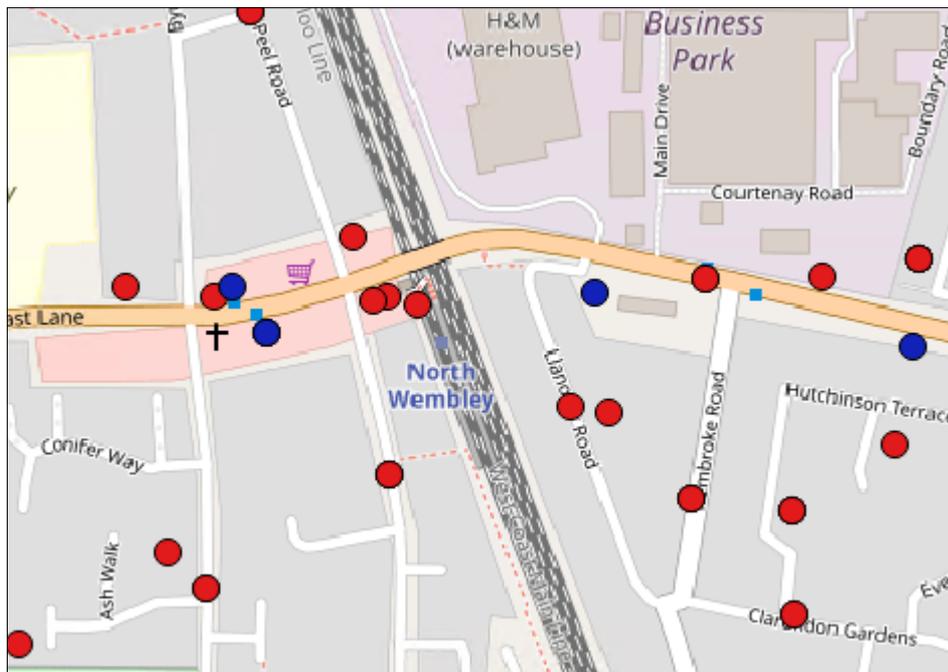
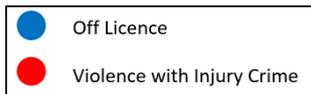
### ***East Lane***

East Lane in North Wembley is a small sized shopping parade in an area of Medium levels of deprivation.

East Lane is not a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour or alcohol related ambulance call outs within Brent.

However, the area has seen an increase in groups drinking in the area, particularly in the summer months causing anti-social behaviour.

The below map shows violence with injury crimes, and off licences in East Lane (01/06/2017 to 31/05/2019):



The streets to be included in East Lane are:

- East Lane
- Sudbury Avenue

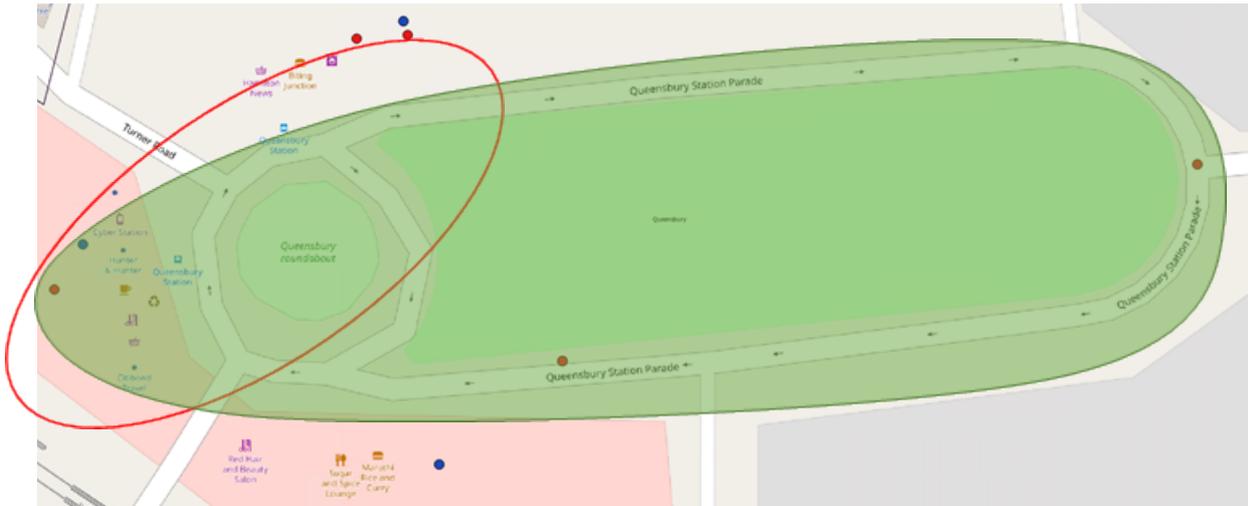
### ***Kingsbury***

Kingsbury town centre is busy shopping parade on both sides of a main road in an area of low to medium levels of deprivation.

Kingsbury is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour and alcohol related ambulance call outs within Brent. The hotspot area circled is around the London Underground station.

The below map shows violence with injury crimes, and off licences in Kingsbury Town Centre (01/06/2017 to 31/05/2019):





The street to be included in Queensbury is:

- Queensbury Station Parade

**Please note:**

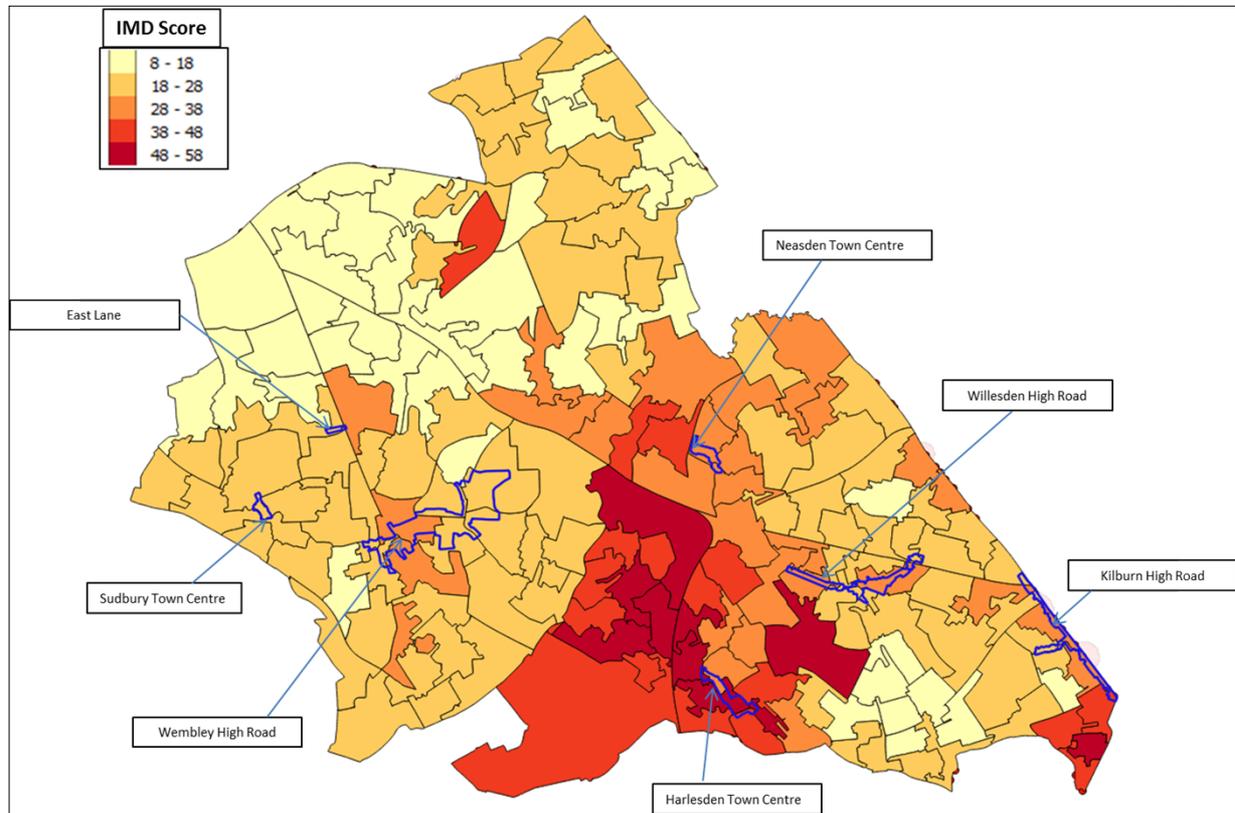
Any premises that are physically located, whereby any part of a building faces onto any of the above main roads and although the address does not form part of the above named road, it will be included in the CIZ. For e.g. a premises building that is positioned on the corner of Ealing Road and Braemar Avenue but where the address is Braemar Avenue, this premises will be included in the CIZ.



## Appendix: Reference maps

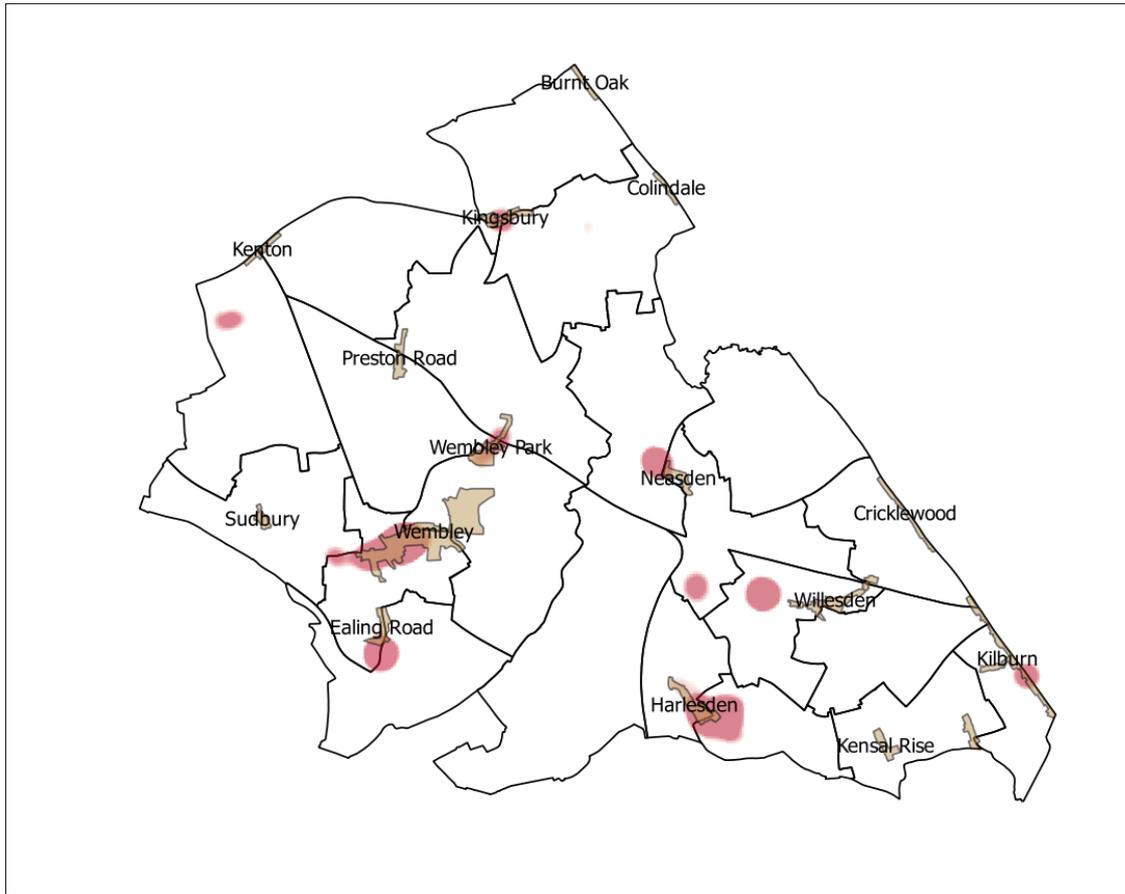
### Map 1

Brent Index of Multiple Deprivation (IMD) score 2015 by Lower Super Output Areas in comparison to the discussed areas.



**Map 2**

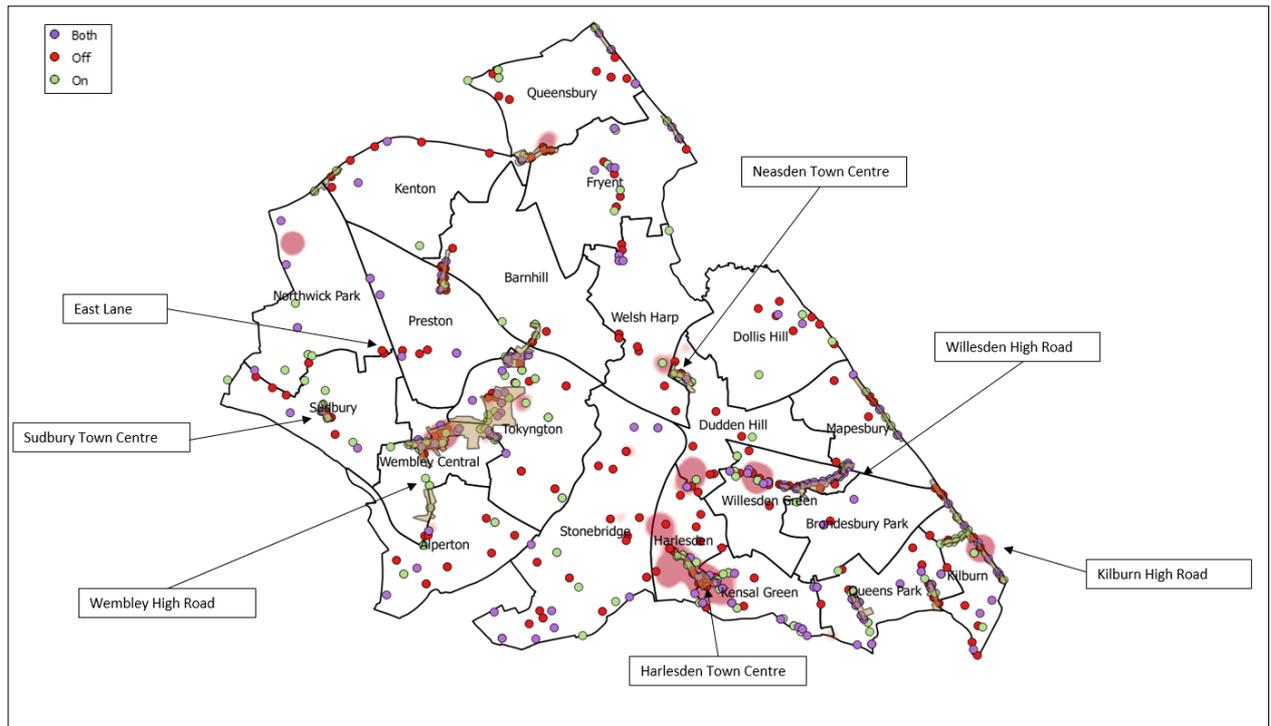
Hotspots in Brent in Ambulance and Police alcohol flagged call out data in comparison to Brent's town centres.



Alcohol-related ambulance and Police calls between 01/06/2017 to 31/05/2019

### Map 3

Hotspot of violence with injury crimes compared to discussed areas and licensed premises.

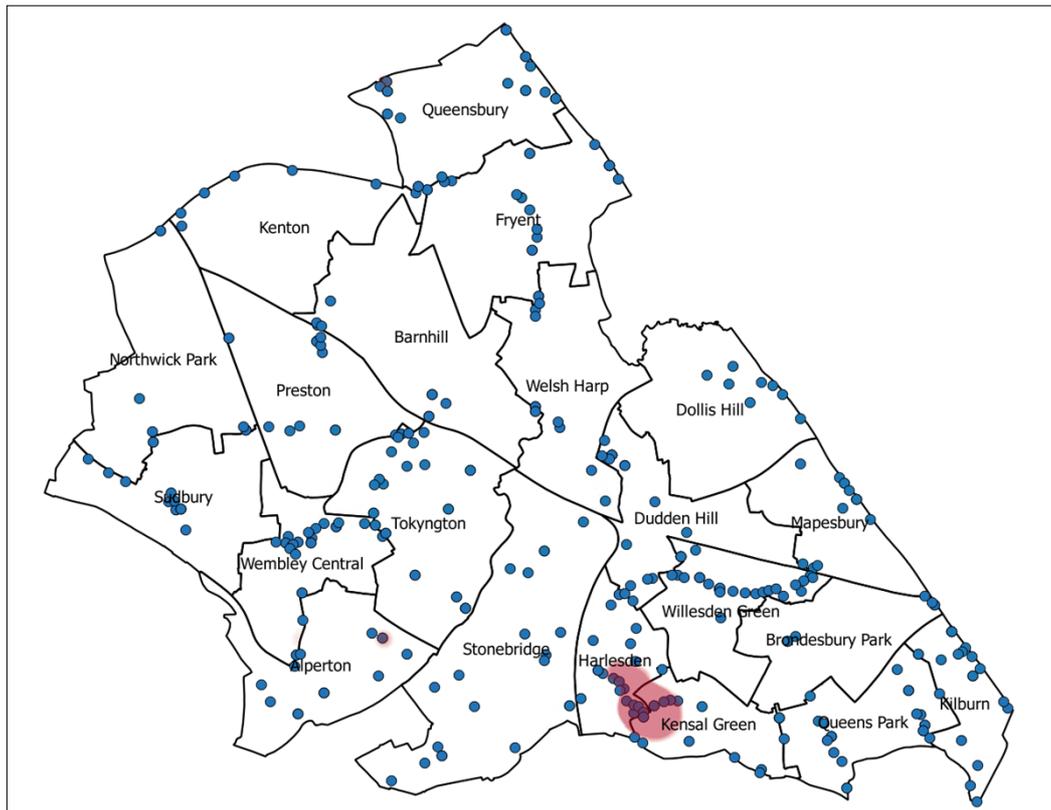


All violence with injury crimes between 01/06/2017 and 31/05/2019

## **Map 4**

### ***Street Drinking Hotspots***

There are relatively few calls to police specifically about street drinking. This may be because they are recorded as other ASB types such as littering or noise. Between 01/06/2017 and 31/05/2018, there were only 53 calls to police. The following year, there were 142. This represents an increase of 168%. Part of this increase may be attributed to callers being aware of the borough wide PSPO on drinking in public which came into effect in October 2017.



Calls to police specifically related to street drinking between 01/06/2017 and 31/05/2019