

# Brent Statement of Licensing Policy – Review 2019

## Consultation Report

### Introduction

A public consultation on the Brent’s draft Statement of Licencing Policy took place from 23 August to 4 October 2019. Residents and/or businesses were invited to give their views and thoughts on the draft policy by completing an online survey. Some 900 letters were sent to all the licensees and agents for their views. The questions asked how strongly participants agreed or disagreed with the principles and objectives of the draft policy. These participants were able to download and read draft copies of the policy and proposals for Cumulative Impact Zones (CIZs) in Brent.

A presentation on the draft policy and proposals for CIZs was given at the 2019 autumn round of Brent Connects meetings. Comments collected from these meetings have also been considered within the review of this policy.

This report contains all the data collected through this consultation. The data has also been filtered to show the responses to key questions from residents and licensed premises.

### Consultation Findings

A total of 35 responses were received, 32 through the online survey and three written submissions. The first question asked participants to tells if they are responding to the survey as a Brent resident, Owner / manager / employee of a licensed premises, Owner / manager / employee of a non-licensed premises, Brent business or other. Below is a breakdown of question 1.

Option	Total	Percentage
Brent resident	17	53.1%
Owner / manager / employee of a licensed premises	8	25%
Owner / manager / employee of a non-licensed premises	0	0%
Brent business	2	6.2%
Other	8	25%
Not Answered	0	0%

Below are the responses collected to certain key questions that have been filtered to show the opinion of residents and licensed premises.

### **Question 3 - Please tell us to what extent you agree or disagree with the following statements.**

	Residents (17)			Licensed Premises/Brent Business (10)		
	Agree	Disagree	N/A	Agree	Disagree	N/A
Brent has a good balance between the regulation of licensed business and the needs of residents.	18%	59%	23%	78%	0%	22%
Brent has a diverse, cultural entertainment offer to its residents and visitors.	18%	53%	29%	66%	17%	17%

The Licensing Policy will address the licensing objectives of: the prevention of crime and disorder; public safety; the prevention of public nuisance; and, the protection of children from harm.	53%	41%	6%	100%	0%	0%
The Licensing Policy will contribute to Brent's aspirations and Brent as a London Borough of Culture in 2020.	36%	41%	23%	89%	0%	11%
The 8 proposed Cumulative Impact Zones will help to reduce crime, nuisance and anti-social behaviour.	59%	29%	12%	89%	0%	11%
The Licensing Policy is accessible and easy to read.	24%	41%	35%	89%	11%	0%
The Licensing Policy is clear on the connections with the Mayor's Vision for London as a 24-hour City.	30%	35%	35%	78%	22%	0%
The Licensing Policy is clear on the process for applications.	36%	24%	40%	78%	11%	11%
The Licensing Policy is clear on the expectations of the Council regarding Temporary Events, particularly those in public spaces.	47%	18%	35%	100%	0%	0%
The Council's preferred hours are a good fit for Brent.	30%	42%	28%	78%	0%	22%

## Free text responses

### 1. Do you feel that the Licensing Objectives and the measures outlined to promote them are clear and achievable for applicants?

*Comment: 19 respondents responded Yes to the above question, 5 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response and proposed changes to Statement of Licensing Policy (SLP)
Yes, but the residents of the area are not clean people as most are street drinkers and homeless people and needs to be cleared up to make it a better environment for a greater people to come and live in the area and do shopping.	<i>SLP cannot address this issue.</i>

<p>I think for applicants it's probably clear however the measures and metrics in place to deduce whether that licensor is granted or declined isn't. How will you assess whether it affects the local residents - how do we have a say in this decision making that may affect our quality of life?</p>	<p><i>Each application has to be considered on its own merits which makes it difficult to set out a clear set of measures and metrics to make decisions. Every application will be different or have different requirements</i></p> <p><i>No change is proposed to the SLP.</i></p>
<p>The objectives are clear. If adhered to then the business should operate in an orderly and safe manner. A trained Licence holder will know these 4 objectives well and should strive to keep their business in check with them.</p>	<p><i>No changes are required in the SLP</i></p>
<p>The objectives of "the prevention of crime and disorder; public safety; the prevention of public nuisance; and, the protection of children from harm" is clear, but achievable is another question.</p>	<p><i>Comment is noted. No changes are required in the SLP</i></p>
<p>Yes, although I am concerned that some applicants take the license application process as of secondary importance to their business plans- even though they go hand in hand. I sense a certain ignorance of their licensing responsibilities and that the form filling and a licence fee is all that's needed.</p>	<p><i>This is a reasonable concern, the aim of the SLP is to provide the framework to have licensees well informed and enforcement processes clear and effective. No changes are required in the SLP.</i></p>
<p>The licensing objectives are clear. Perhaps these and measures to achieving them should be set out in a simpler format that's easier for applicants to digest?</p>	<p><i>This is a reasonable point. The SLP has a wide range to cover and it may be difficult to make it simpler. The aim of the policies is to provide simple, clear information about a range of approaches relating to the Licensing Objectives. Some of these are set out in the appendices. No change is proposed for the SLP.</i></p>
<p>I think that there should be a ban on new stores proposing to sell alcohol in the area. Stricter criteria are good, but we already suffer so much from drunken ASB. We do not need any more inducement for people to come here and yell all night. As I write, there are a group of drunk men outside yelling. It is really unpleasant and happens</p>	<p><i>The proposed policies, particularly the CIZs for off-licences are aimed at addressing some of this behaviour as is possible under the Licensing Act 2003. No change is proposed for the SLP.</i></p>

<p>often. There are already too many shops selling to street drinkers.</p>	
<p>On balance, we do not believe that the measures outlined are entirely clear or achievable for applicants. In addition to the specific questions later in this response, we note the following:</p> <p>Part 2, Section 9 – equal reference should be made to the Challenge 21 scheme. This is the scheme supported and used by most pubs, that helps them to ensure under-age sales of alcohol are prevented.</p> <p>Policy 11 – this policy fails to identify any specific type of venue and so presumably applies to all licensed premises. As it stands, the phrase “high strength” is undefined by the Council, making it unenforceable. Reference is made to 6%ABV without categorically saying this is the definition to be used. There is no reference to volume either, and therefore based on this wording, and pub that chooses to sell any alcohol over 6% could be penalised despite not being in breach of any legislation. This is unreasonable.</p> <p>Policy 17 – we support this policy, and the specific inclusion of PubWatch.</p> <p>Policy 18 – it is not appropriate to include a health-related policy in this proposed Statement. Health is not a feature of the Licensing Objectives. If any health evidence is being presented as a justification for a licensing policy or requirement, then the final paragraph in this policy is essential, namely that the evidence must relate directly to one of the Licensing Objectives.</p>	<p><i>We support the Challenge 25 scheme as best practice. No change proposed for the SLP.</i></p> <p><i>The phrase ‘High strength’ is generally well understood. The policy is encouraging voluntary application of a scheme. It is not possible to apply a blanket definition or approach as each application must be considered on its own merits, applying a blanket definition may also be contrary to competition legislation.</i></p> <p><i>At no point in the policy is it proposed to penalise any applicant that does not apply a high strength condition. No change is proposed to the SLP.</i></p> <p><i>The decision on what should be included in the SLP is for the Council to determine. Furthermore, the Director of Public Health is a responsible authority and the s182 guidance notes the expectation that hospital and ambulance data will be used where appropriate. The last sentence of this policy ensures that the approach is in line with the Act and with guidance. No change is proposed for the SLP.</i></p> <p><i>The Council supports the Challenge 25 scheme as the best practice approach. The policy aims to encourage applicants to adopt what the Council considers to be best</i></p>

<p>Policy 22 – Challenge 21 should also be identified as a valid and effective age-verification framework. Preferential reference to Challenge 25 implies that it is the only suitable scheme whereas Challenge 21 is successfully used by the majority of pubs.</p> <p>Policy 26 – sales that are paid by credit card are sales that are made on credit. The wording of this policy would prevent sales that are paid by credit card.</p>	<p><i>practice. No change is proposed for the SLP.</i></p> <p><i>The wording states ‘no provision of credit for sales’ with credit cards the provision of credit is being provided by the credit card company not the licensee. No change is proposed for the SLP.</i></p>
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**2. Do you feel that the draft Licensing Fees Policy are reasonable and clearly stated?**

*Note: the responses provided for this question were repeats of the above responses.*

**3. Is the Council approach regarding Temporary Events Notices outlined in the draft Licensing Policy reasonable and likely to promote the Licensing Objectives?**

*Comment: 18 respondents responded Yes to the above question, 5 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
<p>No - this is not reasonable. The approach should be more lenient.</p>	<p><i>The approach aligns with the requirements of the Licensing Act and section 182 guidance. No change is proposed for the SLP.</i></p>
<p>The council have clearly expressed their views. The applicant has their part to play. If the applicant works with the Council they should be able to host a safe controlled event, whatever the purpose or function for the relevant application.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>The approach is reasonable and likely to promote the licensing objectives.</p>	<p><i>No change is proposed for the SLP.</i></p>

Generally, yes, although the rules of TEN's is somewhat confused and often results in a muddled and incorrect application form. Despite these errors, they are occasionally accepted as valid applications	<i>All applications are scrutinised before processing to ensure that the application is filled out correctly.</i>
Yes temporary events are not the problem	<i>No change is proposed for the SLP.</i>
Yes, I'd prefer to see something stricter	<i>No change is proposed for the SLP.</i>
<p>No, for the following reasons:</p> <ul style="list-style-type: none"> <li>• It is unreasonable to object to late TENs purely on the principle that is submitted later than a standard TEN.</li> <li>• The policy as proposed implies that by submitting a TEN close to the 10-day deadline will prejudice the outcome of that application. The licensing framework allows for applications to be submitted up to 10 days before and therefore there should be no suggestion that “early” applications will receive a preferential consideration.</li> </ul>	<p><i>TEN applications are dealt with in accordance with the section 182 guidance issued by the Home Office.</i></p> <p><i>The Policy does not imply preferential treatment.</i></p> <p><i>Receipt of Early applications may help resolve outstanding issues with responsible authorities quicker so that the applicant can have ample time to implement measures that may be required.</i></p> <p><i>Some changes have been made in the SLP.</i></p>
From a public health perspective, it would be useful to gain more information regarding how the Council's approach regarding TENs would likely promote Licensing Objectives that are particularly related to protecting the health of visitors and residents (i.e. alcohol induced harm).	<p><i>Public Health are not a statutory consultee on TEN applications.</i></p> <p><i>However, where these concerns arise engagement between public health and licensing authority officials tries to address these concerns.</i></p>

**4. Does the draft Policy 12 on street drinking address issues of public nuisance in a reasonable and effective way?**

*Comment: 16 respondents responded Yes to the above question, 11 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
<p>yes. but Brent need to be more stricter on street drinkers</p>	<p><i>Public Space Protection Order is in place for street drinking. The SLP proposes CIZ where the presumption would be to refuse any new off-licences in CIZ areas.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>No. People with problematic drinking will not be affected by this authoritarian policy.</p>	<p><i>The policy is intended to tighten up licensing aspects of the issue. People with problematic drinking problems are usually referred to appropriate support agencies.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>yes but it must be implemented and enforced</p>	<p><i>Agreed.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>No. Licensees will say they have no control on what people do once they leave their store. Therefore - the council / residents need to review and make the decision on whether this facility or type of store already exists in the area and what impact it's having. In my opinion, until we get control on the current situation - no choice should be given to shops being open after 9pm and selling alcohol at night. There needs to be a cap or reversal on licenses.</p>	<p><i>The aim of the policy is to reduce licensee's contribution to the conditions that facilitate street drinking. The CIZ's are aimed to create a cap on off-licences in areas where there are problems.</i></p> <p><i>Problems that exist need to be addressed by enforcement.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>Street drinking is part of a much bigger picture. It impacts on so many people. This proposed policy will provide clarity as to the councils intentions and is robust where enforcement may be required.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>Causes of street drinking is far more complex than "Reducing the strength approaches having voluntary bans on high strength low cost alcohol.</p> <ul style="list-style-type: none"> <li>· Visible labels identifying the premises.</li> <li>· Use of different coloured or labelled bags for sales of alcohol.</li> <li>· Ensuring street drinkers do not</li> </ul>	<p><i>The policy operates within the limits of the Licensing Act 2003 and the Guidance issued by the Home Office. Substance misuse services provide support to those with addiction and mental health support. It is unable to address the issues raised by this submission.</i></p> <p><i>No change is proposed for the SLP.</i></p>

<p>congregate outside the premises.</p> <ul style="list-style-type: none"> <li>· Ensuring drinkers do not consume alcohol on the premises, also not having the paraphernalia to allow that (e.g. Single plastic drinking vessels or bottle openers near the till area).</li> <li>· No sale of miniatures.</li> <li>· Keeping the premises locality clear of litter"</li> </ul> <p>An effective way to deal with street drinking would be to have a clear social care or mental health policy.</p>	
<p>Doesn't go far enough. This is a major issue in Cricklewood and needs firm immediate action including arrests and prosecutions</p>	<p><i>The aim of the policy is to reduce licensee's contribution to the conditions that facilitate street drinking. The CIZ's are aimed to create a cap on off-licences, in the parts of the borough where there is evidence of undermining the licensing objectives. No change is proposed for the SLP.</i></p>
<p>As I understand a number of these steps outlined in the Policy are already in place, yet the problems of street drinking persists. So, much of the success of the new policy will depend on enforcement. If there's not enough police and enforcement officers to actually follow through, the new policy will be equally ineffective. In addition to this, there are already too many 'problem' bar, pubs and off-licences in Willesden Green that are contributing to the issues of crime and street drinking etc. Targeting the existing outlets is as important as tackling new license applications. What steps are being taken in this respect?</p>	<p><i>The aim of the policy is to reduce licensed premises contribution to the conditions that facilitate street drinking. The CIZ's are aimed to create a cap on off- licences so that they do not add to the problems that already exist.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>I'd prefer to see something stricter and start addressing smoking in public, which is not just a nuisance, but a public health assault &amp; a key cause of litter.</p>	<p><i>The aim of the policy is to reduce licensee's contribution to the conditions that facilitate street drinking. The CIZ's are aimed to create a cap on off- licensees in the parts of the borough</i></p>

	<i>they cover. No change is proposed for the SLP.</i>
It is far too weak to be effective. A voluntary scheme will be insufficient, there also needs to be a ban on new shops selling alcohol, the existing ones sell to street drinkers and should not be allowed to continue doing this. Because there is no police presence in Neasden, the PSPO is not enforced and street drinkers stand around yelling all night. Having to put up with groups of drunk, out of control men loitering in the street all night is deeply unpleasant and also unsafe. Policy 12 is a good start but by itself it is insufficient to end this ongoing problem.	<i>The aim of the policy is to reduce licensee's contribution to the conditions that facilitate street drinking. The CIZ's are aimed to create a cap on licensees in the parts of the borough they cover.</i>  <i>No change is proposed for the SLP.</i>
No, for the following reason: • There is too little detail on how areas will be identified (e.g. What are the criteria? Who decides? Is there a process to appeal designation? How often will the designation be reviewed?) The absence of details such as this will make the policy difficult to enforce and is likely to lead to confusion amongst licence-holders and enforcers, which in turn will lead to challenges.	<i>The areas have been identified using crime data and alcohol flagged ambulance call out data.</i>  <i>The aim of the policy is to reduce licensee's contribution to the conditions that facilitate street drinking and ASB. Decisions on how this applies will be on a case by case basis. The CIZ's are aimed to create a cap on licensees in the parts of the borough they cover.</i>  <i>The CIZ's have to be reviewed within 3 years.</i>  <i>No change is proposed for the SLP.</i>
Yes, more evidence could be included in regards to the health/social effects of street drinking, i.e. hospital admissions.	<i>It may be difficult to link this sort of evidence specifically to street drinking rather than drinking more generally.</i> <i>No change is proposed for the SLP.</i>

**5. Does the draft Policy 21 on delivery services address issues of crime and disorder, public nuisance and the protection of children in a reasonable and effective way?**

*Comment: 17 respondents responded Yes to the above question, 4 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
It doesn't at all. Very daft policy - make believe.	<i>Similar policies have been used in other areas successfully. No change is proposed for the SLP.</i>
I couldn't quite see it but very often trucks delivering food pallets to Way to Save in Neasden come at random times of the evening. The noise of the tail lift and crates being unloaded / loaded is very disturbing when trying to sleep. Please could you be more clear on delivery trucks in your policy - not to be done after 9pm and before 7am.	<i>This matter should be dealt with by Nuisance Control team.  No change is proposed for the SLP.</i>
There is only so much that can be done as prevention. That said everyone has a role to play. The council has clearly indicated its view on Public Safety.	<i>No change is proposed for the SLP.</i>
Doesn't go far enough. More action needed.	<i>Within the remit of the SLP this policy goes about as far as is possible. No change is proposed for the SLP.</i>
As above. A number of the crime and disorder hotspots urgently need more CCTV cameras and police presence. The businesses that Are making money from and contributing to this problem should be actively involved in resolving them. For example, gambling outlets should have CCTV and better lighting as a standard. Pubs, bars off-licences and gambling shops in particular should be contributing funds towards more security staff/policing in the area.	<i>No change is proposed for the SLP.</i>
I'd prefer to see something even more strict, but a start	<i>No change is proposed for the SLP.</i>
It would be useful to include reference to the Challenge 21/25 framework as an existing and effective approach to age-verification.	<i>This is included.  No changes proposed for the SLP.</i>

**6.Does the draft Policy 24 on a minimum unit price address issues of crime and disorder, public nuisance, and protection of children in a reasonable and effective way?**

*Comment: 17 respondents responded Yes to the above question, 8 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
<p>COMPLETELY OPPOSE THIS POLICY. THIS IS AN ATTACK ON THE POOR. THERE IS NO EVIDENCE A MINIMUM UNIT PRICE WILL AFFECT ANY OF THOSE ISSUES YOU CLAIM. IT WILL JUST INCREASE THE PRICE FOR EVERYONE. 70p PER UNIT IS FAR TO HIGH. THIS IS PURITANISM BY THE BACK DOOR.</p>	<p><i>The evidence is in place and links are provided to it in the policy. Modelling evidence also shows that it is unlikely to impact more on low income moderate drinkers</i></p> <p><i>Changes have been made to the SLP</i></p>
<p>No, it penalises ordinary residents who want a social drink.</p>	<p><i>The evidence is in place and links are provided to it in the policy. Modelling evidence also shows that it is unlikely to impact more on low income moderate drinkers. Changes have been made to the SLP</i></p>
<p>No. Minimum price for alcohol of 70P per unit is not reasonable or effective.</p>	<p><i>The evidence is in place and links are provided to it in the policy. Modelling evidence also shows that it is unlikely to impact more on low income moderate drinkers. Change have been made to the SLP.</i></p>
<p>No. It is a lunatic idea.</p>	<p><i>The evidence is in place and links are provided to it in the policy. Modelling evidence also shows that it is unlikely to impact more on low income moderate drinkers.</i></p> <p><i>Changes have been made to the SLP</i></p>
<p>Isn't this way too low? We want to discourage the buying of alcohol especially in the evening / night. So if the licenses are amended so no-one can sell in the evening - fine. But if yes - then this is too accessible.</p>	<p><i>The modelling evidence undertaken by Sheffield University only goes up to 70p per unit. Without modelling for any higher level we believe there is insufficient evidence to apply a higher MUP. Changes have been made to the SLP</i></p>
<p>Time will tell with this matter. As long as all responsible parties</p>	<p><i>Changes have been made to the SLP.</i></p>

<p>adhere to the strategy then I cannot see any issues.</p>	
<p>Any minimum unit price must reflect the consensus which is 50p per unit as in Scotland and not 70p per unit. The draft policy is unclear how a minimum unit price would address issues of a) crime and disorder b) public nuisance, and c) protection of children and would benefit from further information as to research which show this is reasonable or effective.</p> <p>As the causes of a) crime and disorder b) public nuisance c) protection of children are much more complex than the price of alcohol. Alcoholism affects both rich and the poor.</p>	<p><i>The evidence is in place and links are provided to it in the policy. Modelling evidence also shows that it is unlikely to impact more on low income moderate drinkers. There is no consensus nationally re level of MUP, Sheffield modelling covered 50p, 60p and 70p. Changes have been made to the SLP</i></p>
<p>It should help to combat these issues.</p>	<p><i>Changes have been made to the SLP</i></p>
<p>This is a good start but needs to be enforced</p>	<p><i>Changes have been made to the SLP</i></p>
<p>Minimum unit prices should be increased significantly, if we are serious about discouraging street drinking and protecting the young. At present this is a token gesture. Cheap and easy access to any drug (alcohol happens to be legalised), will only support the drug problem.</p>	<p><i>The modelling evidence undertaken by Sheffield University only goes up to 70p per unit. Without modelling for any higher level we believe there is insufficient evidence to apply a higher MUP.</i></p> <p><i>Changes have been made to the SLP</i></p>
<p>No, for the following reasons:</p> <ul style="list-style-type: none"> <li>• Policies of MUP are typically applied as a means of addressing health issues due to excessive alcohol consumption. Public health is not one of the Licensing Objectives, and it is therefore unreasonable to apply such a policy for Licensing purposes.</li> <li>• England does not have legislation that requires MUP, and therefore any venue that is licensed to sell alcohol should not be compelled to apply such a policy. Making the use of the policy “voluntary” does not hide</li> </ul>	<p><i>Evidence from both real life research and modelling has shown impacts on crime and disorder as well as health impacts.</i></p> <p><i>The policy does not compel, only encourages the voluntary setting of an MUP. Changes have been made to this policy to address some of these matters.</i></p>

the fact that there will be clear disbenefits for any premise that does not adopt such a policy even though there is no legal requirement to do so.	
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**7. Does the draft Policy 25 on the provision of licences for schools and community centres address issues of public nuisance in a reasonable and effective way?**

*Comment: 17 respondents responded Yes to the above question, 4 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
In a time when Educational facilities are being pressurised into making use of their halls to generate additional income I am pleased to see the council have featured this topic. As with previous answers there is a great deal of responsibility with hosting events at venues such as these. With each application the applicant must understand this point in the policy.	<i>No change is proposed for the SLP.</i>
"Ensuring appropriate time for cleaning and making good of the venue" is a reasonable requirement, but denying schools the opportunity to have licensable activities at times when children are not on the premises is not reasonable or effective. Schools should be able to hold events on Sundays or on Evenings and use provisions of a license to sell alcohol and generate income if they so desire. It is possible to clean and make good of a venue after the event and before children arrive at a school. If the council believes otherwise, officers should clearly demonstrate that it is not possible to clean and make good a venue	<p><i>Most of the policy requires applicants to demonstrate the approaches they will take to cleaning and making good after an event. In terms of the objection to Sunday during school term, we believe that the precautionary approach in relation to protecting children from harm is appropriate.</i></p> <p><i>No change is proposed for the SLP.</i></p>

after an event has occurred. Most events run by schools will be related to the parent teacher association raising money with a cheese and wine evening or a play. There will be no problem with schools getting the places organised and clean again.	
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**8. Is the draft Policy 20 on dispersal and entry to licensed premises sufficient to address issues created by dispersal and entry into licensed premises?**

*Comment: 17 respondents responded Yes to the above question, 4 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
No - how will this be monitored? What action will the council do? Is there a 2 strike warning system for example: If there is reason to believe that your premises is linked to street drinking - this is a strike - a written warning is issued. If this happens more than twice then your license to sell alcohol is revoked totally.	<i>This is an operational matter.</i>  <i>No change is proposed for the SLP.</i>
If the points are applied it should minimise complaints and in return the reputation of a venue/premises should be a positive one.	<i>No change is proposed for the SLP.</i>
For the council to hold licence holders liable for patrons once they have left the immediate vicinity of their premises, is neither reasonable, proportionate or realistic. Disturbance caused away from premises is a matter for police and the council cannot hold license holders liable.	<i>This policy does not holder licensees liable, it outlines approaches they can put in place to minimise the likelihood of disturbances.</i>  <i>No change is proposed for the SLP.</i>
Not enough. Needs to be fully enforced	<i>This is an operational matter.</i>  <i>No change is proposed for the SLP.</i>

AS above. More CCTV, Police presence and shorter licensing hours. We don't need half a dozen off licenses and bars with late licenses.	<i>This is an operational matter. No change is proposed for the SLP.</i>
No, for the following reason: • The policy uses the phrasing “if linked to the operation of the premises” is too vague and could be used for spurious reasons to take action on a venue. A premises’ operations will typically be within the law and licensing requirements. Consideration should be given to clarifying this phrasing, such as “if linked to the illegal operation of the premises” or “if linked to the operation of the premises being counter to the Licensing Objectives”.	<i>This phrasing has been changed in the draft SLP to reflect this comment.</i>

**9. The CIZ areas include (list of the 10 areas), do you feel that the evidence provided sufficiently outlines the issues to be addressed in terms of crime and disorder and anti-social behaviour?**

*Comment: 16 respondents responded Yes to the above question, 10 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
NO. Just because there has been X amount of incidents of violence - does not mean alcohol is the reason for them.  Putting Neasden as a CIZ when you state yourself there are limited incidents there compared to some of the other areas shows that you don't care about the evidence.  For Willesden - the time frame of 2 years is vast. Ridiculous.	<i>No change is proposed for the SLP.</i>
Neasden town centre should include Birse Crescent which a haven for people to consume the	<i>Birse Crescent will be included. No change is proposed for the SLP.</i>

<p>alcohol they have bought from the high street. This street should be flagged for consumption and gathering of people that may lead to anti-social behaviour.</p>	
<p>Yes. The evidence submitted is based on fact. Clearly in those areas listed there is work to still do.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>The data proposed to justify the CIZ does not reasonably justify the establishment of the zones. Crime, disorder and anti-social behaviour happen for much more complex reasons than the amount of incidents over the course of years.</p>	<p><i>Agree. The data used is linked to alcohol flagged data.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>Yes, but should continue to be reviewed to ensure the areas are relevant to the CIZ and adjustments made as needed.</p>	<p><i>The CIZs are now required to be reviewed every 3 years or earlier.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>No. More direct action needs to be taken. More enforcement. Greater police presence in problem areas.</p>	<p><i>This is an operational matter.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>Willesden Green High Road as well as Walm Lane suffer the effects of too many off licenses, gambling outlets, bars and pubs which are simply fuelling the problems of drugs, crime and antisocial behaviour. Residents and other responsible businesses have been the paying the price for the Councils failure to tackle these issues over the years. There is more evidence that demonstrates not only a couple of off licenses at one end of Willesden Green are causing problems, but that a number of other businesses contribute to ongoing issues along the high road (at the Library, Lechmere and Linacre rd) and on Walm lane.</p>	<p><i>This may be a matter for further consideration and inclusion at a later point.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>I'd prefer this be all areas.</p>	<p><i>This is not possible under the legislation, and not considered to appropriate for all areas of Brent. No change is proposed for the SLP.</i></p>

<p>No, it is not sufficient. It is so unpleasant for residents to be constantly subjected to the noise of people drinking on the street and shouting all night. It is impossible to sleep through and really damages quality of life.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>There is very little evidence of a significant problem presented for some of the ten areas, notably – Neasden Town Centre, Sudbury Town Centre, East Lane and Kingsbury. On the basis of what has been presented, the decision to make these areas CIZs is questionable.</p> <p>Equally, the proposed policy highlights that there has been a “significant and notable increase in alcohol related crime and anti-social behaviour” since 2016, yet there is no evidence provided to support that statement. Any figures provided only go back two years, and there is no pre-2016 evidence provided as a comparison.</p> <p>There is also no evidence presented that compares those areas that are proposed CIZs with the Borough as a whole or Greater London – so it is not clear that the selected areas present a problem that is any worse than other areas.</p> <p>Appendix 6 presents various maps that seek to illustrate the proposed areas. However, it is not clear what the significance of the red-ringed areas are. The enclosed areas do not appear to be any worse in terms of the number of instances than the areas beyond the red-ring. If these are meant to be “hotspots”, the basis for their selection is not clear.</p>	<p><i>No change is proposed for the SLP</i></p>

<p>It is also not clear of the relationship in each map between the red-ringed area and the orange-shaded areas. In some instances, the red-ring is not within or connected to the shaded areas and so it is unclear how the CIZ has been determined based on the “hotspot” presented. It makes the decision of the extent of the CIZ appear somewhat arbitrary.</p>	
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**10. Given the issues and the purpose of the CIZs do you feel the purpose is appropriate to reduce the impact of crime and disorder and anti-social behaviour in the proposed CIZ areas is appropriate?**

*Comment: 20 respondents responded Yes to the above question, 5 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
<p>NO. CIZ won't work.</p>	<p><i>Evidence shows that well applied and enforced CIZs do have an impact on violent crime and hospital admissions. No change is proposed for the SLP.</i></p>
<p>When you say 'purpose' do you mean policies put forward? Well I think what's missing is the governance piece - how is it going to be measured - following issuance. reviewed every 3months? But I do believe this is a start and I'd like to see how affective this would be to create the preventative measures.</p>	<p><i>The CIZs are now required to be reviewed every 3 years or earlier.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>If all the relevant partners work together and the responsible persons with licensed venues then yes I do believe the CIZs can work.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>It is appropriate but I don't think that the measures suggested will be sufficient to resolve the problem.</p>	<p><i>Evidence shows that well applied and enforced CIZs do have an impact on violent crime and hospital admissions. No change is proposed for the SLP.</i></p>

<p>CIZs should be used only on the basis of evidence, and in conjunction with other measures.</p>	<p><i>Evidence shows that well applied and enforced CIZs do have an impact on violent crime and hospital admissions. No change is proposed for the SLP.</i></p>
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**11. The CIZs relate to applications for off-licences, do you feel this is the most appropriate way to use the CIZs to address the issues?**

*Comment: 19 respondents responded Yes to the above question, 5 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comment	Response
<p>Yes, I do believe one root is the alcohol sold to people. However, there is another piece which is more of a grey area - drugs. This is where council need to work better with the Met Police on having a focal point on one zone every week or bi-weekly. As the drugs in the area do the same - create anti-social behaviour.</p>	<p><i>This is an operational matter.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>Yes. In some business areas there are too many licensed premises. Some are adhering to the licensing objectives yet unfortunately some aren't. With the CIZs any new applications will be managed from the form to a decision in a controlled manner and any decision will be made for the community's benefit.</p>	<p><i>No change is proposed for the SLP.</i></p>
<p>Scapegoating off-licenses when crime happens for much more complex reasons than the action of a shop.</p>	<p><i>The evidence gathered suggests that this is one aspect of the issue and that this is one aspect of the approaches to address it.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>Needs to target all alcohol vendors including supermarkets</p>	<p><i>The CIZs do target supermarkets.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>As Above. It's not just off licenses causing problems, but late night bars and some pubs that attract a certain crowd</p>	<p><i>The aim of the CIZ policy is to address issues most closely related with off-licences. Other policies aim to address issues associated with on-licences.</i></p> <p><i>No change is proposed for the SLP.</i></p>

<p>I think that the measures suggested are fine but more action should be taken too to stop existing licensed premises selling to street drinkers. The only way to stop this is to get police down to enforce the PSPO, at the moment it is flouted.</p>	<p><i>The street drinking PSPO policy and operational practice aim to address these issues.</i></p> <p><i>No change is proposed for the SLP.</i></p>
<p>If the aim is to prevent street drinking, then the scope of the CIZs certainly should not be extended beyond off-licences. It should be appreciated that a CIZ can have the effect of offering a degree of protection to existing licensed premises (which may be acting in a manner that fails to meet the Licensing Objectives) whilst preventing new and perhaps better-managed businesses from setting up and providing competition.</p>	<p><i>This may be an unintended consequence of the CIZs.</i></p> <p><i>However, operational enforcement is in place to address any licensee not promoting the licensing objectives.</i></p> <p><i>No change is proposed for the SLP.</i></p>

**12. Do you feel that all other efforts that could reasonably be made to address the issues have been made?**

*Comment: 15 respondents responded Yes to the above question, 10 responded No and the remainder either responded Don't Know or had a mixed response (dealt with the in the comments below.*

Comments	Response
<p>NO. The council has consistently cut services that are preventative of crime.</p>	<p><i>This is outside of the remit of the SLP.</i></p> <p><i>No changes are proposed for the SLP.</i></p>
<p>No. There is already a street drinking PSPO which is great but it is not enforced. Go to Craven Park Road any day and it is full of street drinkers</p>	<p><i>This is an operational matter.</i></p> <p><i>No changes are proposed for the SLP.</i></p>
<p>There is another piece that needs to be addressed which is more of a grey area - drugs. This is where council need to work better with the Met Police on having a focal point on one zone every week or</p>	<p><i>This is outside of the remit of the SLP.</i></p> <p><i>No changes are proposed for the SLP.</i></p>

<p>bi-weekly. As the drugs in the area do the same - create anti-social behaviour. Last night I had no sleep as there were people under our balcony - outside Costa coffee until 5am. They were being loud / smoking and these 3 individuals are known to hang around and cause disturbance. They should be on CCTV cameras. Unfortunately we would need to change behaviour through negative reinforcement - with the Polices help.</p>	
<p>Yes, with regards to the relevant authorities. The operators must remember they have their part to play also.</p>	<p><i>No changes are proposed for the SLP.</i></p>
<p>No discussion of Social Care, homeless and Mental Health services efforts that have been made to try and address the issue.</p>	<p><i>This is outside of the remit of the SLP. No changes are proposed for the SLP.</i></p>
<p>Yes, within the confines of staffing. It would appear austerity and staff numbers in proactively tackling licensing concerns has had a drastically negative impact on ensuring licensing objectives are being upheld.</p>	<p><i>This is outside of the remit of the SLP. No changes are proposed for the SLP.</i></p>
<p>Street drinkers (and drug users) are responsible for damaging public property. This ranges from breaking shop windows, to damaging street furniture (road signs etc), to breaking plants and trees, to vomiting and urinating in plant pots, on pavements and at the station. As well as criminal activity, theft, aggressive and intimidating behaviour towards residents etc. Again residents and responsible businesses are paying a hefty price to support these individuals and their behaviour in the community. It is unreasonable and cannot be tolerated.</p>	<p><i>This is outside of the remit of the SLP. No changes are proposed for the SLP.</i></p>

<p>I honestly don't care. Change needs to happen so happy for any movement forward</p>	<p><i>No changes are proposed for the SLP.</i></p>
<p>No, I don't. The council have tried to do what they can but they are very understaffed. The police are very under-resourced too but I have been asking them for years to send officers down to tackle the street drinking. I think it is the same small group of men very often, if the police attended a few weekends in a row to tell them not to come back then maybe that would have an impact. At the moment they are allowed to get away with making our lives a misery.</p>	<p><i>This is outside of the remit of the SLP. No changes are proposed for the SLP.</i></p>
<p>It is not possible to tell from the proposed policy what other efforts have been made to address the issues. No evidence is presented of other efforts and their impact. Ostensibly it appears that CIZs are being used as a single measure.</p>	<p><i>No changes are proposed for the SLP.</i></p>