

Brent Cumulative Impact Assessment Review 2022 Consultation Report

Introduction

A public consultation on the Brent's review and proposals for Cumulative Impact Zones (CIZs) took place from 1 September to 30 September 2022. Residents and/or businesses were invited to give their views and thoughts by completing an online survey. Emails and letters were sent to all the licensees and agents for their views. The questions asked how strongly participants agreed or disagreed with the current CIZs and the proposal to introduce two new CIZs. These participants were able to download and read draft copies of the proposals for Cumulative Impact Zones (CIZs) in Brent.

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

Consultation Findings

A total of 23 responses were received, 22 through the online survey and one written submission. The first question asked participants to tell if they are responding to 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	73.9%
Owner / manager / employee of a licensed premises	0	0%
Owner / manager / employee of a non-licensed premises	0	0%
Brent business	0	0%
Other	6	26.1%
Not Answered	0	0%

Below are the responses collected to certain key questions.

Question 3 - Do you agree or disagree with continuing with the current CIZ

	Agree	Disagree	N/A
Harlesden	87%	4.3%	8.7%
Wembley Central	78.3%	13%	8.7%
Ealing Road	78.3%	13%	8.7%
Kilburn High Road	82.6%	8.7%	8.7%
Willesden High Road	82.6%	8.7%	8.7%
Neasden Town Centre	82.6%	8.7%	8.7%
East Lane	78.3%	8.7%	13%
Queensway	78.3%	8.7%	13%
Kingsbury Station Parade	82.6%	8.7%	8.7%
Sudbury Town	87%	4.3%	8.7%

Question 4 - Do you feel that the evidence provided for the 10 current CIZ areas sufficiently outlines the issues to be addressed in terms of crime and disorder and anti-social behaviour?

Yes – 78.3%

No – 21.7%

Free text responses

Question 5. If you disagreed with any of the existing 10 CIZs please explain why and identify and additional evidence you would like us to consider.

Comment	Response
This is more of a social and cultural problem which would need to be implied closer. In the case of what was mentioned, increase police [presence] or community police officers would be more desirable.	Noted
East Lane has only a limited amount of premises that are currently or will be in the future, licensed. It [is] not the same type of area as those other 9 areas and doesn't have the same negative issues.	Noted
Evidence is not tailored specifically enough to local areas, needs and impacts. Appears to be too broad brush.	Noted
Just because someone buys alcohol in one place doesn't mean they cannot drink it elsewhere.	Noted
The CIZ should also be considered in respect to 'on licences'. We have seen from experiences at the Euros and certain concert or boxing events that many instances of ASB can be directly attributed to 'on licence' premises. The PSPO and it's slightly dubious controls over 'off licences' on event days and alcohol sales are already very tough but controls over 'on licence' premises are not equal.	Noted
Harlesden CIZ should include Station Road	Noted- Requested further evidence from Community Safety team
Crime [is] not related to alcohol shops	Noted
Event days - the cost of alcohol at a game is £6.75 a pint. Although I completely understand concerns not everyone who wants a drink [on] the	Noted

way to a game is causing an issue or unable to use a bin	
Shoot Up Hill should be part of the Cricklewood Broadway CIZ. Not Neasden. More geographically logical as Shoot Up Hill becomes Cricklewood Broadway. Harlesden Road should be added to Willesden. There is only one shop with a licence at 144. Litter from street drinkers is an issue.	Changes made to zones.
East Lane has a completely different structure and demographic	

Question 6. The proposed new areas for CIZs are Wembley Park and Cricklewood Broadway. Do you feel that the evidence provided sufficiently outlines the issues to be addressed in terms of crime and disorder and anti-social behaviour?

Yes - 87%

No – 13%

Question 7. If you answered No above, please explain your answer.

Comments	Responses
This is more of a social and cultural problem which starts at home. In comparison, other nations where drinking is allowed on public streets do not have such a disorder.	Our policy cannot address this issue
Not enough evidence of direct cause of crime and disorder.	Comment is noted. No changes are required in the CIZ policy
There are obvious ASB issues around Wembley Park that predominantly occur during large events at Wembley Stadium. Since the EUROs final the PSPO in respect to 'street drinking has been enforced when, previously it wasn't. I would expect that there should be clear evidence available to support the new Wembley Park CIZ. With this in mind I must ask why Olympic Way and Wembley Boulevard are not in the proposed CIZ? There are many licenced premises on both Olympic Way and Wembley Boulevard and more units and buildings are being built and or opened on a weekly basis. Many of these are likely to apply for new premise licences or where	Comment noted. Olympic Way and Wembley Boulevard now included in CIZ.

existing premises may also asked for variations to extend hours etc.	
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Question 8. Do you agree or disagree that the proposed two new areas should be in a Cumulative Impact Zones?

A Agree - 78.3%

B Disagree 21.7%

Question 9. If you disagreed in question 8 please can you explain why, highlighting which area you are disagreeing with?

Comment	Response
All this won't reduce anything only place more wood to the fire	Comment noted
Wembley Central event day exemption	Comment noted
Needs shops	Comment noted

Question 12. 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?

A Yes - 78.3%

B No - 21.7%

Do you think there are additional areas that should be considered for a CIZ?

Comment	Responses
Preston Road	Noted for next review
Bridge Road – Barnhill Burnt Oak Broadway - Queensbury Church Road – Roundwood Honeypot Lane - Queensbury Heather Park Drive – Alperton Mount Pleasant – Alperton Olympic Way – Wembley Park Ward Salisbury Road – Kilburn Wembley Hill Road – Tokyngton Ward Wembley Park Drive – Preston	Some have been added to the existing CIZs.

Other comments;

Comments	Response
The data appears to come from crime reports that are available to the public. This would have come from crime reports that were taken by police. Many ASB calls do not result in crime reports as ASB is not a recordable crime in most cases. It would be beneficial to gain another layer of data of calls to police relating to ASB to see if these correspond with the TNO data in the proposal.	Comments noted
Anecdotally it is known crime is under reported, especially 'low level' ASB. This is due to residents giving up on reporting to the police because no action is taken. The under reporting masks to real level of ASB that then escalates to more serious crime. Hence the police stats do not reflect the real crime situation which then impacts on deciding which areas are included in CIZ.	Comments noted
Minimum Unit Pricing should be mandatory for new/reviewed licences with a CIZ.	Comments noted
It no longer matches ward boundaries which may confuse people.	Comments noted
I agree with the need. I just think that on an event day people shouldn't be stopped from having a good time just because others have caused an issue. The limited selling just means that customers are able to be charged an extortionate fee at the event	Comments noted
CIAs are a sop to crime and disorder reduction. For example, we could just ban all licenced premises and that would then reduce crime?! This is not an adequate response to the issues residents' experience.	Comments noted

Cumulative Impact Assessment Consultation Questions 2022

1. Are you a:

- Brent resident
- Owner / manager / employee of a licensed premises
- Owner / manager / employee of a non-licensed premises
- Other, please specify: _____

2. Please give your postcode: _____

3. Do you agree or disagree with continuing with the current CIZ

	Agree	Disagree	Don't Know
Harlesden	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wembley Central	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ealing Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Kilburn High Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Willesden High Road	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Neasden Town Centre	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
East Lane	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Queensbury	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Agree	Disagree	Don't Know
Kingsbury Station Parade	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sudbury Town	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

4. Do you feel that the evidence provided for the 10 current CIZ areas sufficiently outlines the issues to be addressed in terms of crime and disorder and anti-social behaviour?

A Yes

B No

5. If you disagreed with any of the existing 10 CIZs in Question 3, please explain why and identify any additional evidence you would like us to consider.

6. The proposed new areas for CIZs are Wembley Park and Cricklewood Broadway. Do you feel that the evidence provided sufficiently outlines the issues to be addressed in terms of crime and disorder and anti-social behaviour?

A Yes

B No

7. If you answered No above, please explain your answer.

8. Do you agree or disagree that the proposed two new areas should be in a Cumulative Impact Zones?

A Agree

B Disagree

9. If you disagreed in question 8 please can you explain why, highlighting which area you are disagreeing with?

10. Given the purpose of the CIZs in limiting the number of premises selling alcohol in specific areas, do you feel this is appropriate to reduce the impact of crime and disorder and anti-social behaviour in these areas?

A Yes

B No

11. If you answered No above, please explain your answer.

12. 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?

A Yes

B No

13. If you answered No above, please explain your answer.

14. Do you think there are additional areas that should be considered for a CIZ?

A Yes

B No

15. If you answered Yes above, please explain which additional area(s) should be included in the Cumulative Impact Assessment, providing their boundaries and the evidence to support your view.

16. Please use the space below for any other comments you wish to make about the Cumulative Impact Assessment:

3. Attachments

Please attach any written submissions or additional evidence you would like to be considered as part of the consultation process.

4. About you

So we can best understand our service users and residents please complete this optional information about you. All information is used under the strict controls of the 1998 Data Protection Act:

17. What is your age?

A 0-15

B 16-24

C 25-34

D 35-44

E 45-54

F 55-64

G 65+

H Prefer not to say

18. Do you consider yourself to be disabled?

A Yes

B No

C Prefer not to say

19. What is your ethnicity?

A Asian or Asian British

B Black or Black British

C White or White British Other ethnic group

D Other ethnic background

E Prefer not to say

20. What is your gender?

A Female

B Male

C Non-binary

D Prefer not to say

21. Is your gender identity different to the sex you were assumed to be at birth?

A Yes, it's different

B No, it's the same

C Prefer not to say

22. What is your sexual orientation?

A Bisexual

B Lesbian or gay woman

C Gay man

D Heterosexual or straight

E Other

F Prefer not to say

23. What is your religion or belief?

A No religion or belief

B Buddhist

C Christian

D Hindu

E Jewish

F Muslim

G Sikh

H Other

I Prefer not to say

Thank you for taking part in this questionnaire.