

## Policy 9: Cumulative Impact Policy

- Policy:** The Council has adopted a Cumulative Impact Policy to establish Cumulative Impact Zones for the following areas: Harlesden; Wembley Central; Ealing Road; Kilburn High Road; Willesden High Road; Neasden Town Centre; East Lane; Kingsbury; Queensbury Station Parade; Sudbury Town – Harrow Road and Watford Road; Wembley Park and Cricklewood Broadway. The Cumulative Impact Policy for these areas applies only to Off-Licences. Where an application for a new off-licence or for variations to off-licences is received (which would increase the sale of alcohol, including through longer hours), the presumption is that the application will be refused

The Council has established twelve (12) Cumulative Impact Zones (CIZs) in Brent. The purpose of these CIZs is to address levels of crime and disorder, and anti-social behaviour, particular that associated with street drinking. Therefore, the CIZs will specifically relate to applications and variations for off-licences.

The Cumulative Impact Policy will be reviewed every three years in line with requirements under the Licensing Act 2003, though the next review will take place in two years' time to bring it in line with the overall review of the Statement of Licensing Policy.

It is important to note that the CIZs adopted will not cause any existing licences to be changed. It can only apply to new applications and variations of existing licences. It is also not an absolute policy and where an applicant can satisfactorily evidence that their application or variation will not negatively impact on the licensing objectives the Licensing Authority will determine the application on its own merit.

The CIZs do not address the matter of the need for a premises. The need for premises is a commercial matter and is not a consideration for the Council in the discharge of its functions and this policy. Need is a matter for the planning authority and market forces.

It is also important to note that Policy 11: Voluntary ban on high strength sales is a separate policy and adoption of the voluntary condition(s) supported and encouraged in Policy 11 will not necessarily address the requirements under a Cumulative Impact Zone. Any licence application in a CIZ area will need to demonstrate with evidence that its operation will not add to any cumulative impacts that the CIZ is seeking to address.

See Appendix 6 for further details.

### ***Cumulative impact outside of Cumulative Impact Policy areas***

The Council recognises that the cumulative impact of licensed premises can be experienced by residents in areas where there is no current cumulative impact policy in place. Cumulative impact is not defined in the Licensing Act 2003 but is addressed in national guidance which defines it as "the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area". The guidance goes on to state that the cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for a licensing authority to consider in developing its licensing policy statement.

The Council will consider any representation that refers to the impact of a number of premises in an area. The absence of a special policy in an area will not prevent any Responsible Authority or other person from making representations on the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives in the area in question. Representations referencing cumulative impact need to be evidence based and

show how the present number of licensed premises are impacting on the objectives and demonstrate how a specific licensed premises in a particular area will add to those problems.

## Appendix 6: Cumulative Impact Zones

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 Road and Queensbury Station Parade;
- East Lane;
- Sudbury Town – Harrow Road and Watford Road;
- Wembley Park and
- Cricklewood Broadway.

### What is a CIZ?

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

A CIZ creates circumstances 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 to be addressed by 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 Zones (CIZs) in England and Wales.

### Why have CIZs in Brent?

The Council’s current Licensing Policy came into effect 6 January 2020 at this time there were ten CIZs identified. Since 2020 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 and neighbourhoods.

Data captured from various sources including alcohol related police 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.

In areas which benefit from 24-hour tube service the Council not only has to ensure a safe environment that also supports a vibrant, diverse and successful night time economy in Kilburn and Wembley. This involves promotion of on-licences for restaurants, music venues etc that

support the culture and economy of these areas, whilst tackling the negative impacts created by too many off-licences in any given area.

In January 2020 ten CIZ's were established in the following areas;

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

### **Which types of licences will this effect?**

The CIZs will only effect applications that relate to off-licences or variations to existing off-licences. This is specifically to address the public nuisance and crime and disorder (violence crimes in particular) that are caused through activities such as street drinking.

### **The Review of CIZ areas**

The maps below shows violence with injury crimes between 1 July 2021 and 30 June 2022.

The higher the bar the higher the reporting of the chosen dataset is in the area.

### **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 streets off the main town centre such as Rucklidge Avenue, Wendover Road, Buckingham Road and St Albans Road.

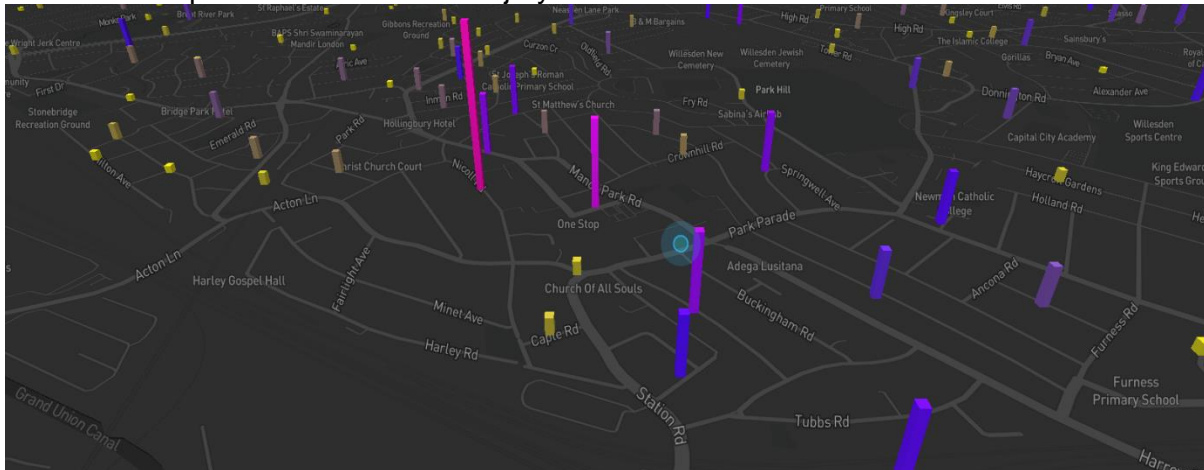
Harlesden Town Centre is also the primary hotspot for reports of street drinking to police. All other town centres in Brent suffers from street drinking; however, in parts of Harlesden such as Craven Park Road and High Street, the street drinking interrelates with drug misuse and violent crime.

Between 1 July 2021 and 30 June 2022 there were 321 reports to the police, including 184 relating to anti-social behaviour, 28 relating to public order breaches and 87 reports relating to violence.

The streets to be included in Harlesden are:

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

The below map shows violence with injury crimes.



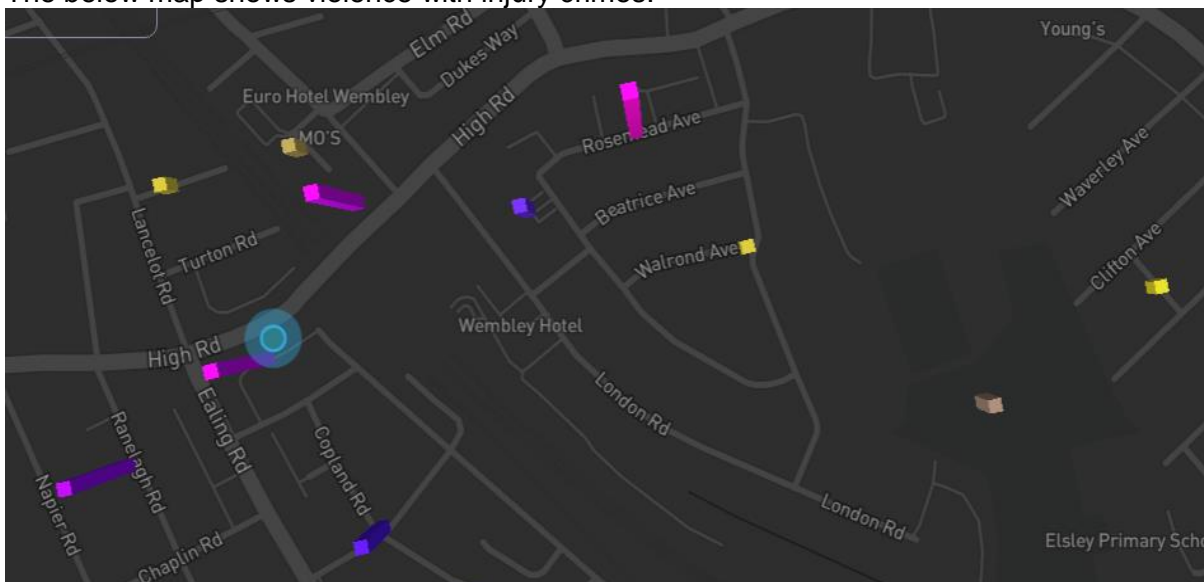
### Wembley Central (Wembley High Road/North End of Ealing Road)

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. The data shows the whole of the High Road from Ealing Road to Wembley Triangle experiencing high levels of alcohol related issues.

Between 1 July 2021 and 30 June 2022 there were 279 reports to the police, including 118 relating to anti-social behaviour, 39 relating to public order breaches and 104 reports relating to violence.

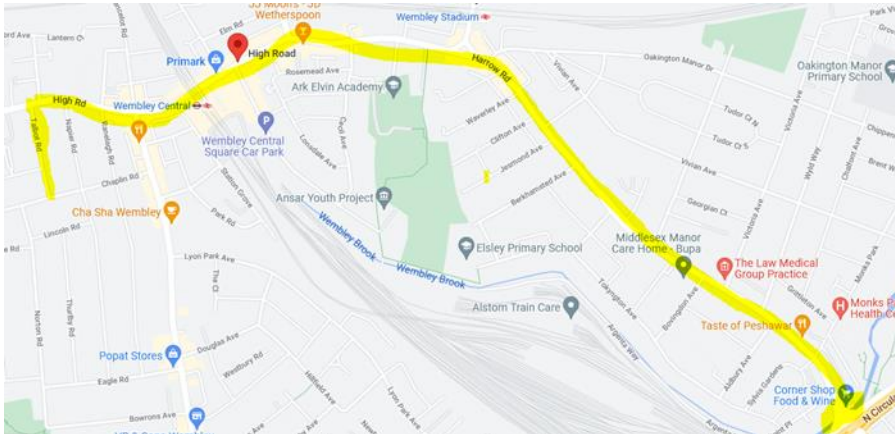
The below map shows violence with injury crimes.



The streets to be included in Wembley Central are:

- High Road
- Lancelot Road

- Harrow Road – (Wembley- North of the North Circular)
- London Road
- Central Square
- Wembley Park Drive



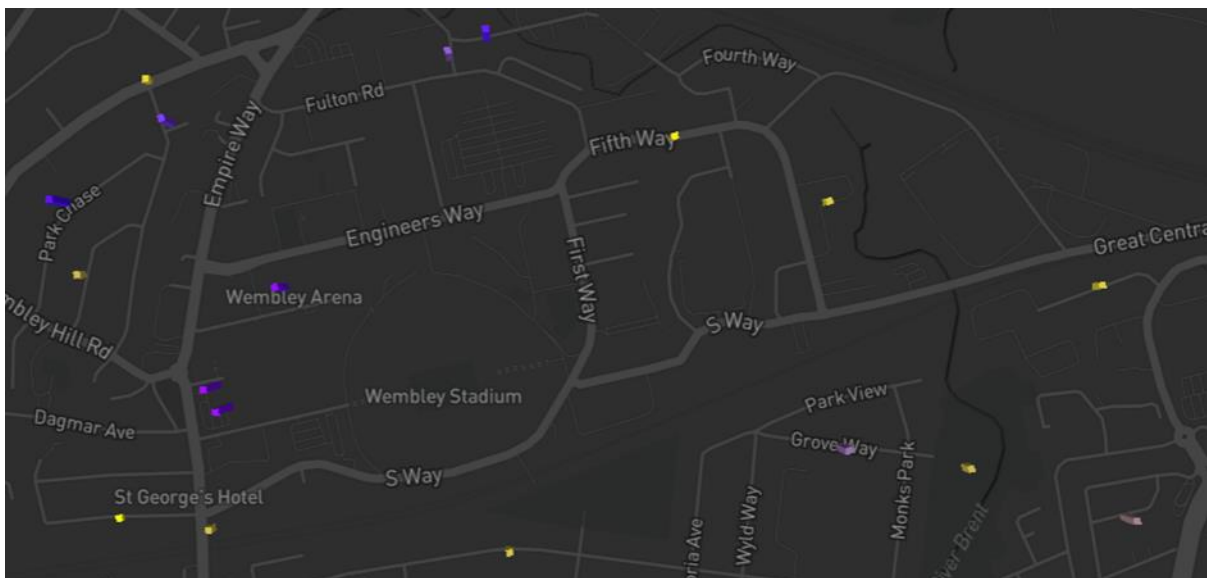
## Wembley Park

Wembley Park is a new CIZ which would include the new developments in the area. It includes the roads surrounding the Stadium. Due to the number of events and the increased number of shops the data shows there is a high level of ASB in the area.

This new area comprises of St John's Avenue and Park Lane which will be removed from the Wembley Central CIZ.

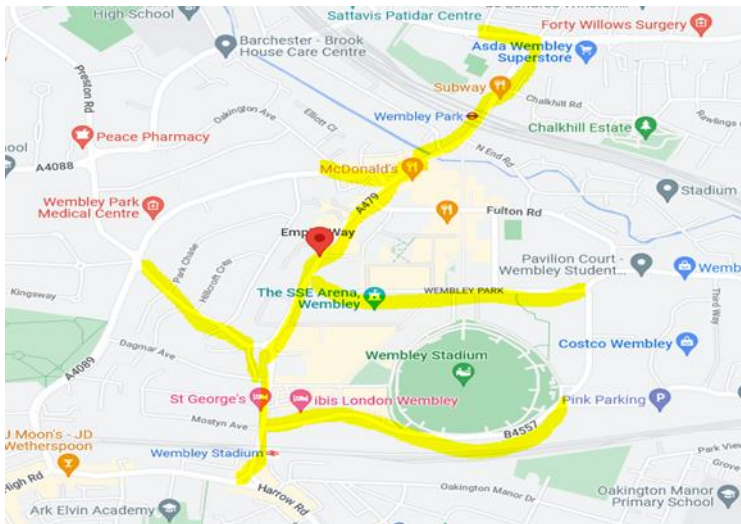
Between 1 July 2021 and 30 June 2022 there were 266 reports to the police, including 147 relating to anti-social behaviour, 15 relating to public order breaches and 99 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included in Wembley Park are (starting at junction of Barn Rise & Forty Avenue to Wembley Triangle) are:

- Empire Way
- South Way
- Wembley Hill Road
- Engineers Way
- Grand Parade (Forty Lane)
- Olympic Way
- Bridge Road
- Wembley Park Drive



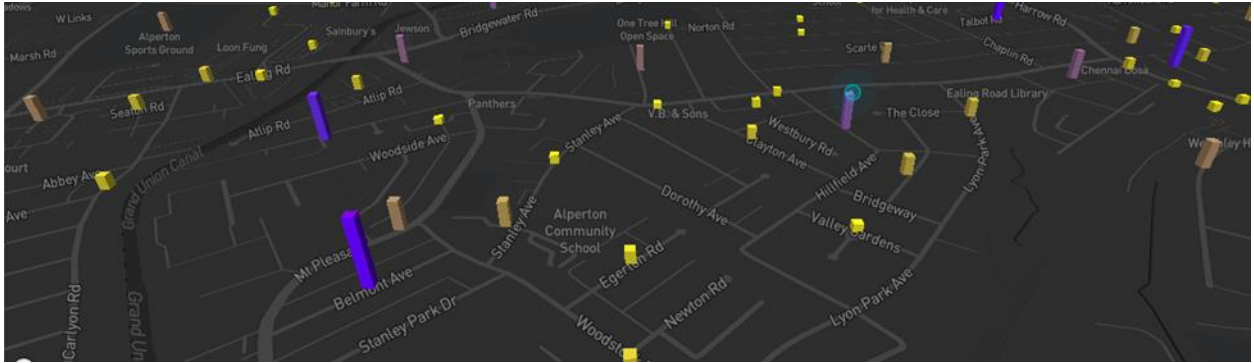
## Ealing Road

Ealing Road from the junction of High Road Wembley up to the junction of Bridgewater Road.

This is an area with medium to high levels of deprivation and is a hotspot for alcohol related calls to police. This area is also a high reporting area for street drinking and ASB related reports to Brent Council.

Between 1 July 2021 and 30 June 2022 there were 183 reports to the police, including 72 relating to anti-social behaviour, 11 relating to public order breaches and 91 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included are:

- Altip Road
- Mount Pleasant Road up to the junction of Orchard Close
- Montrose Crescent
- Union Road
- Coronet Parade
- Heather Park Parade
- Mount Pleasant

### Neasden Town Centre

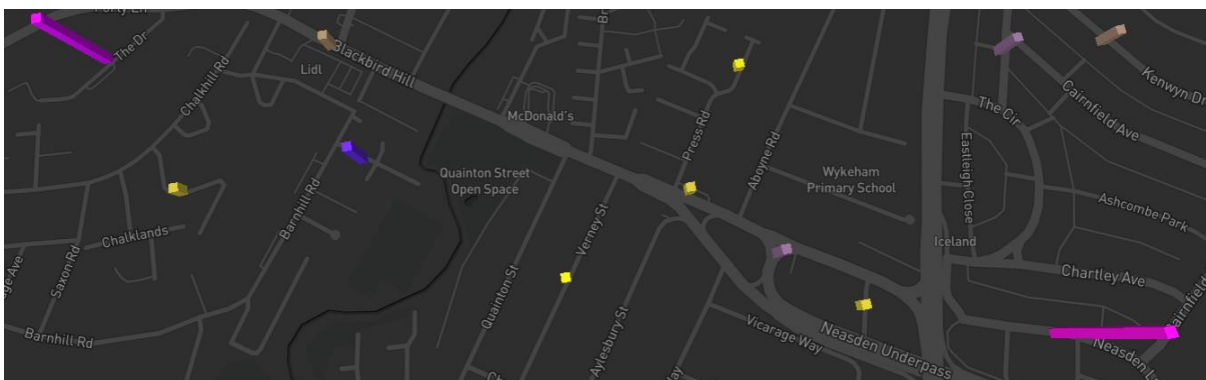
Neasden town centre consists of a medium sized parade of shops that run along Neasden Lane which is just off the North Circular Road. The town centre is primarily in Dudden Hill ward and in an area of medium to high levels of deprivation.

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.

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

Between 1 July 2021 and 30 June 2022 there were 212 reports to the police, including 91 relating to anti-social behaviour, 27 relating to public order breaches and 81 reports relating to violence.

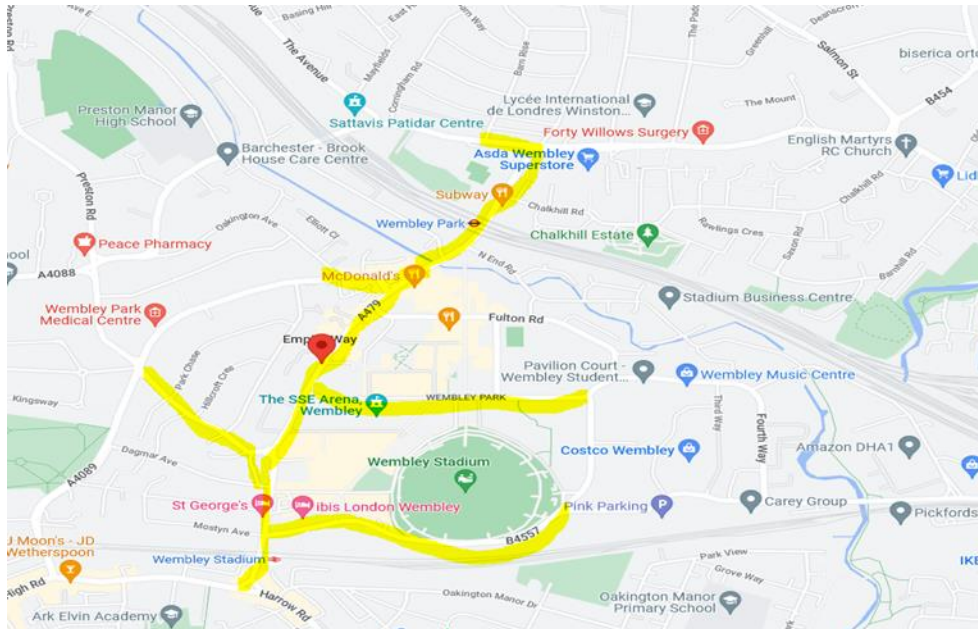
The below map shows violence with injury crimes.





The streets to be included in Neasden Town Centre are:

- Neasden Lane
- Neasden Lane North
- Blackbird Hill
- Forty Lane (up until the road 'The Paddocks')



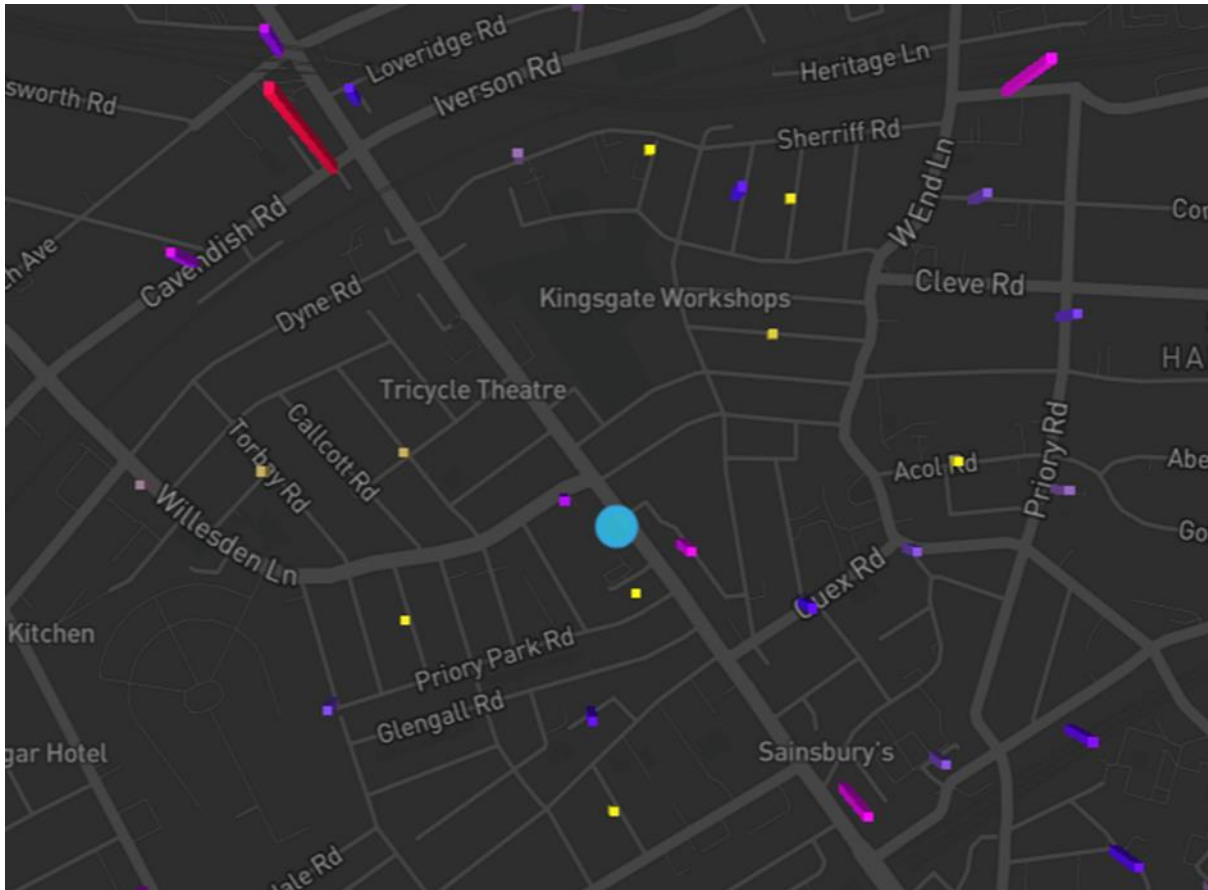
### **Kilburn High Road**

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.

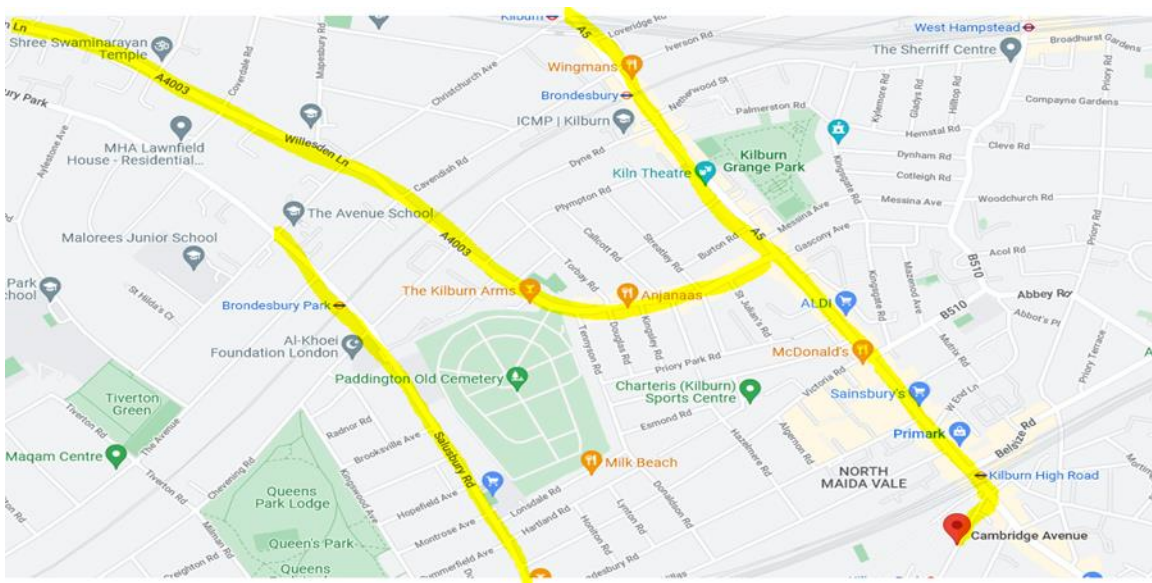
Between 1 July 2021 and 30 June 2022 there were 556 reports to the police, including 263 relating to anti-social behaviour, 58 relating to public order breaches and 225 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included in Kilburn are:

- Kilburn High Road (starting at Christchurch Avenue to Cambridge Avenue)
- Glengall Road
- Willesden Lane
- Cambridge Avenue
- Salisbury Road

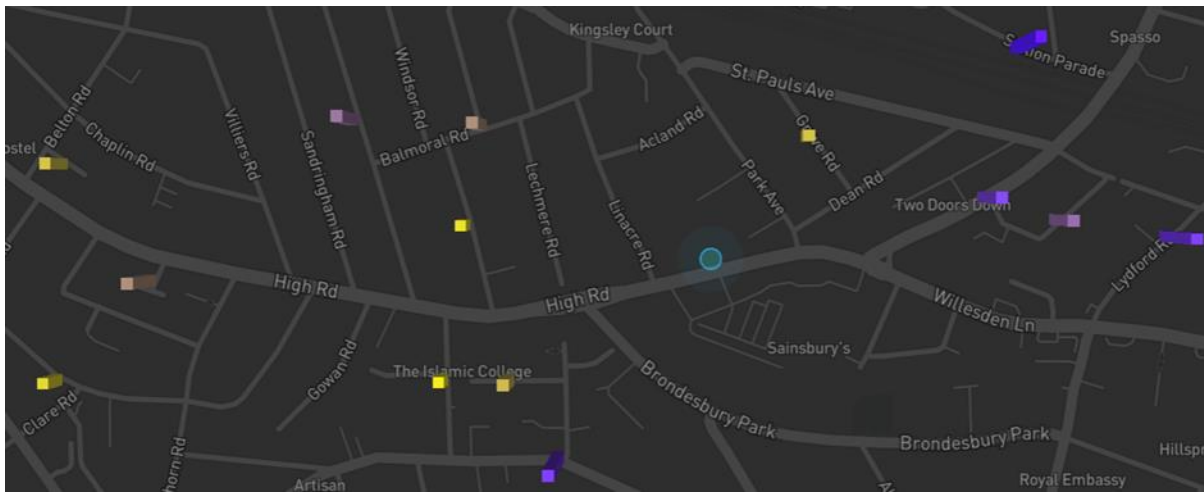


## High Road, Willesden

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 ASB. The data shows the alcohol related issues are primarily just outside the town centre around the junction of High Road, Willesden and Pound Lane.

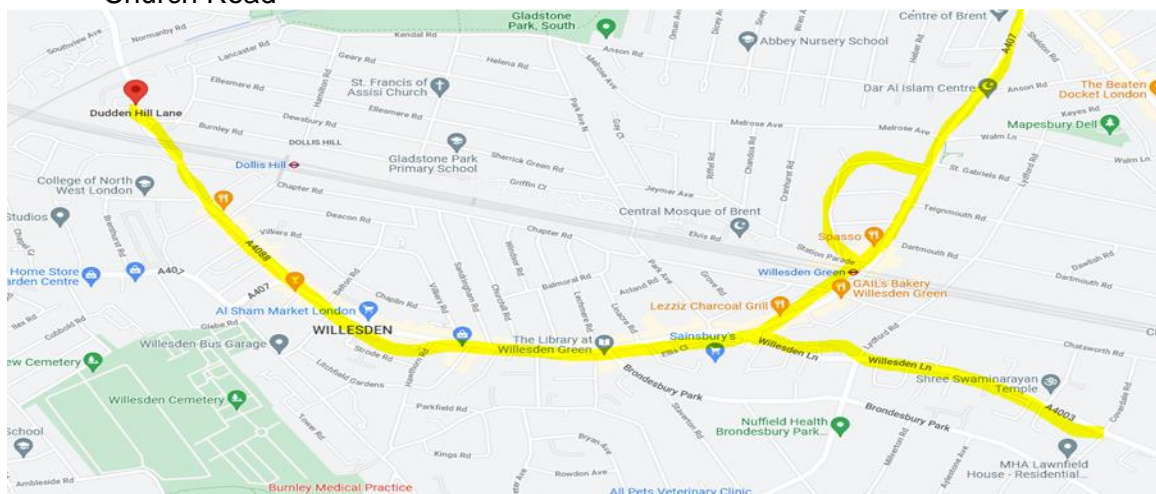
Between 1 July 2021 and 30 June 2022 there were 240 reports to the police, including 93 relating to anti-social behaviour, 31 relating to public order breaches and 106 reports relating to violence.

The below map shows violence with injury crimes.



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

- High Road
- Dudden Hill Lane
- Walm Lane
- Station Parade
- Willesden Lane
- Pound Lane
- Church Road



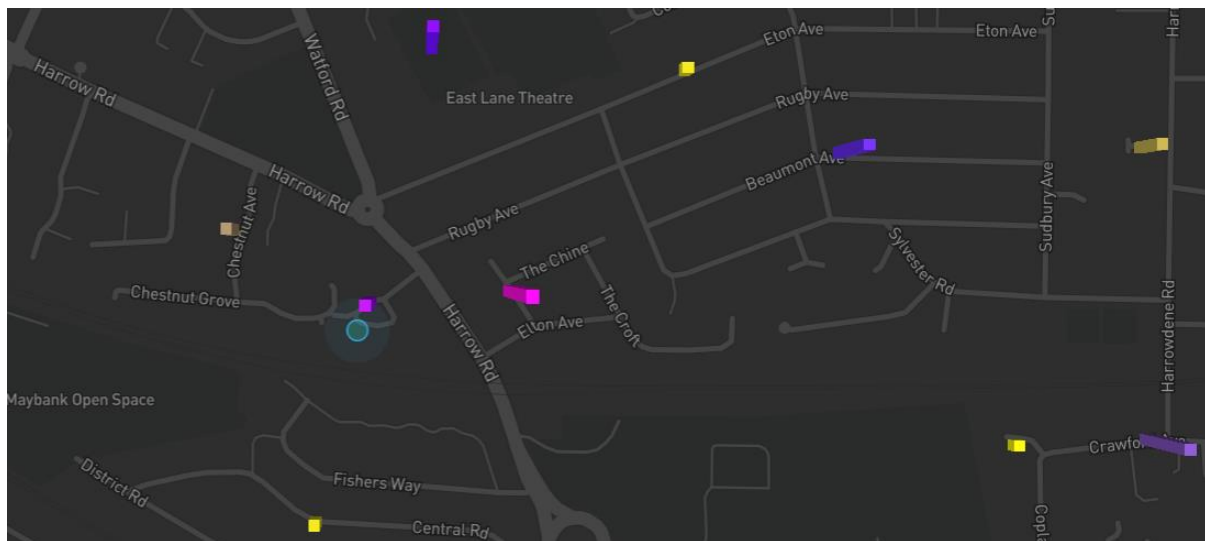
### Sudbury Town Centre

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.

Between 1 July 2021 and 30 June 2022 there were 209 reports to the police, including 114 relating to anti-social behaviour, 20 relating to public order breaches and 72 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included in Sudbury Town Centre are:

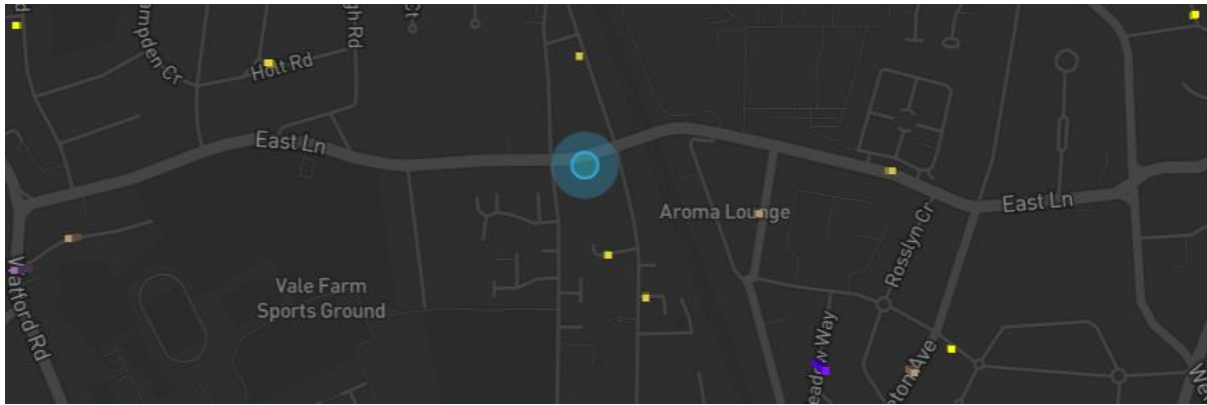
- Sudbury Town Centre (junction of Sudbury Roundabout (adjacent to District Road) up to the junction of Chestnut Avenue, along Watford Road up to the junction of Homefield Avenue)
- Harrow Road - North of the North Circular
- Watford Road

### 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. Recent data has shown a reduction in this area, however historically this has been a challenging location and sits between two other CIZ locations.

Between 1 July 2021 and 30 June 2022 there were 120 reports to the police, including 84 relating to anti-social behaviour, 5 relating to public order breaches and 31 reports relating to violence.

The below map shows violence with injury crimes.



The street to be included in East Lane is:

- East Lane

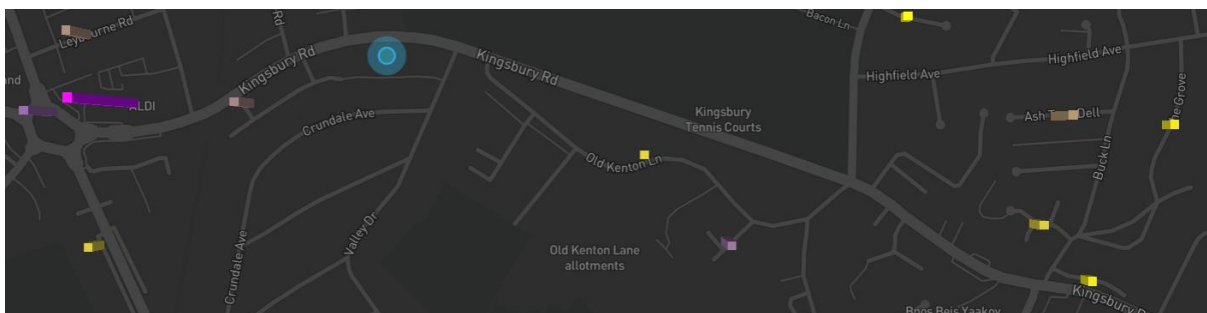
### **Kingsbury**

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 in the north of the Borough. The hotspot area circled is around the London Underground station.

Between 1 July 2021 and 30 June 2022 there were 158 reports to the police, including 73 relating to anti-social behaviour, 11 relating to public order breaches and 68 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included in Kingsbury are:

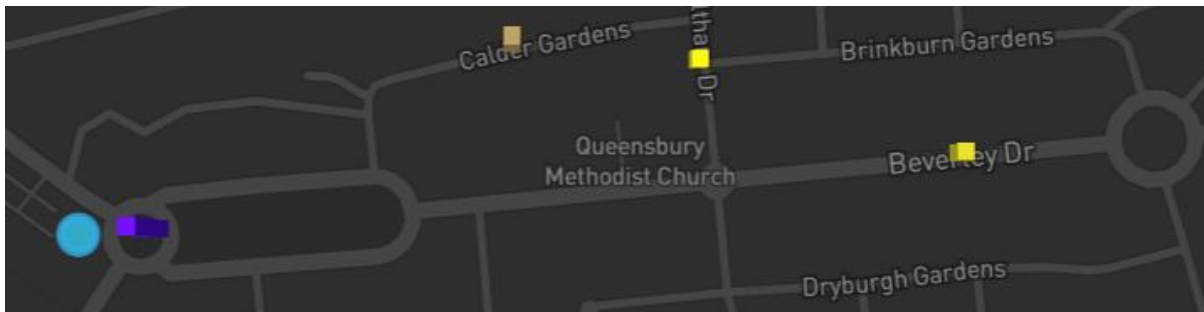
- Kingsbury Road
- Edgware Road
- Church Lane
- Hay Lane
- Kenton Road
- Fryent Way up to Wyndale Avenue

### **Queensbury**

Queensbury station parade is a parade of shops, businesses and restaurants surrounding a green public area in an area of Medium levels of deprivation. Incidents of street drinking are high perception wise, although they are not reflected in calls to police. This is a significantly smaller geographical area compared to other CIZs.

Between 1 July 2021 and 30 June 2022 there were 43 reports to the police, including 14 relating to anti-social behaviour, 4 relating to public order breaches and 24 reports relating to violence.

The below map shows violence with injury crimes.



The streets to be included in Queensbury are:

- Queensbury Station Parade
- Burnt Oak Broadway
- Honeypot Lane

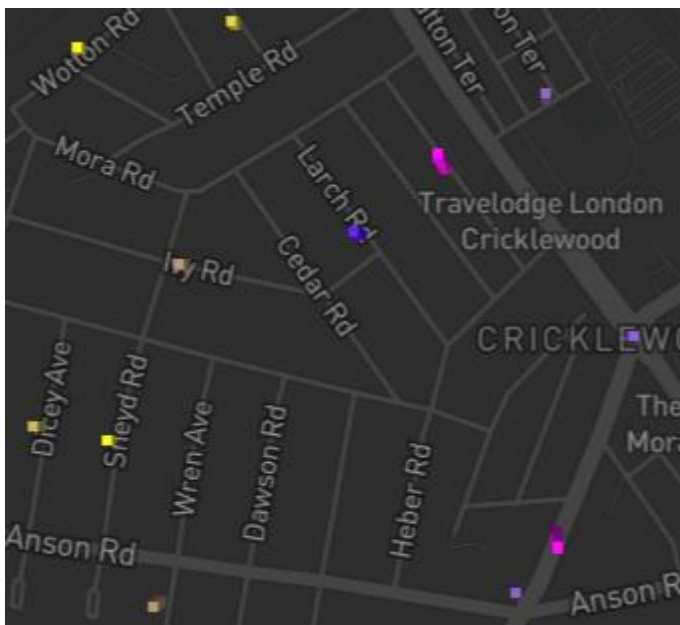
### **Cricklewood Broadway**

Cricklewood Broadway is a busy High Street with a variety of shops on one side of the Broadway which is in Brent. The data shows that there is a high level of ASB.

This is a new CIZ for Brent.

Between 1 July 2021 and 30 June 2022 there were 238 reports to the police, including 149 relating to anti-social behaviour, 2 relating to public order breaches and 81 reports relating to violence.

The below map shows violence with injury crimes.



The street to be included in Cricklewood Broadway is:

- Cricklewood Broadway