

# Extraordinary Licensing Committee

## Agenda

**Tuesday, 22 October 2024 at 6.00 p.m.**  
**Committee Room - Tower Hamlets Town Hall,**  
**160 Whitechapel Road, London E1 1BJ**

### Members:

**Chair:** Councillor Peter Golds

Councillor Faroque Ahmed, Councillor Leelu Ahmed, Councillor Musthak Ahmed, Councillor Suluk Ahmed, Councillor Sabina Akhtar, Councillor Shahaveer Shubo Hussain, Councillor Ahmodul Kabir, Councillor Ahmodur Khan, Councillor Abdul Malik, Councillor Ana Miah, Councillor Abdi Mohamed, Councillor Rebaka Sultana, Councillor Bellal Uddin and 1 Vacancy

[The quorum for this body is 3 voting Members]

### Contact for further enquiries:

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<http://www.towerhamlets.gov.uk/committee>



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## **A Guide to Licensing Committee**

The Licensing Committee will determine Licensing policy/procedure (excluding the Council's Statement of Policy) as well as Licensing fees and charges.

The Committee will also establish a Licensing Sub-Committee to consider Licensing matters under the Licensing 2003 Act where representations have been made.

### **Public Engagement**

Meetings of the committee are open to the public to attend, and a timetable for meeting dates and deadlines can be found on the council's website.

# London Borough of Tower Hamlets

## Licensing Committee

Tuesday, 22 October 2024

6.00 p.m.

### APOLOGIES FOR ABSENCE

#### 1. DECLARATIONS OF INTEREST (PAGES 5 - 6)

Members are reminded to consider the categories of interest in the Code of Conduct for Members to determine whether they have an interest in any agenda item and any action they should take. For further details, please see the attached note from the Monitoring Officer.

Members are reminded to declare the nature of the interest and the agenda item it relates to. Please note that ultimately it's the Members' responsibility to declare any interests form and to update their register of interest form as required by the Code.

If in doubt as to the nature of your interest, you are advised to seek advice prior to the meeting by contacting the Monitoring Officer or Democratic Services

#### 2. ITEMS FOR CONSIDERATION

##### 2.1 Cumulative Impact Assessment Policy 2024 - 2027 (Pages 7 - 110)

#### **Next Meeting of the Licensing Committee**

Thursday, 16 January 2025 at 6.30 p.m. to be held in Committee Room - Tower Hamlets Town Hall, 160 Whitechapel Road, London E1 1BJ



# Agenda Item 1

## **DECLARATIONS OF INTERESTS AT MEETINGS– NOTE FROM THE MONITORING OFFICER**

This note is for guidance only. For further details please consult the Code of Conduct for Members at Part C, Section 31 of the Council's Constitution

### **(i) Disclosable Pecuniary Interests (DPI)**

You have a DPI in any item of business on the agenda where it relates to the categories listed in **Appendix A** to this guidance. Please note that a DPI includes: (i) Your own relevant interests; (ii) Those of your spouse or civil partner; (iii) A person with whom the Member is living as husband/wife/civil partners. Other individuals, e.g. Children, siblings and flatmates do not need to be considered. Failure to disclose or register a DPI (within 28 days) is a criminal offence.

Members with a DPI, (unless granted a dispensation) must not seek to improperly influence the decision, must declare the nature of the interest and leave the meeting room (including the public gallery) during the consideration and decision on the item – unless exercising their right to address the Committee.

**DPI Dispensations and Sensitive Interests.** In certain circumstances, Members may make a request to the Monitoring Officer for a dispensation or for an interest to be treated as sensitive.

### **(ii) Non - DPI Interests that the Council has decided should be registered – (Non - DPIs)**

You will have 'Non DPI Interest' in any item on the agenda, where it relates to (i) the offer of gifts or hospitality, (with an estimated value of at least £25) (ii) Council Appointments or nominations to bodies (iii) Membership of any body exercising a function of a public nature, a charitable purpose or aimed at influencing public opinion.

Members must declare the nature of the interest, but may stay in the meeting room and participate in the consideration of the matter and vote on it **unless:**

- A reasonable person would think that your interest is so significant that it would be likely to impair your judgement of the public interest. **If so, you must withdraw and take no part in the consideration or discussion of the matter.**

### **(iii) Declarations of Interests not included in the Register of Members' Interest.**

Occasions may arise where a matter under consideration would, or would be likely to, **affect the wellbeing of you, your family, or close associate(s) more than it would anyone else living in the local area** but which is not required to be included in the Register of Members' Interests. In such matters, Members must consider the information set out in paragraph (ii) above regarding Non DPI - interests and apply the test, set out in this paragraph.

### **Guidance on Predetermination and Bias**

Member's attention is drawn to the guidance on predetermination and bias, particularly the need to consider the merits of the case with an open mind, as set out in the Planning and Licensing Codes of Conduct, (Part C, Section 34 and 35 of the Constitution). For further advice on the possibility of bias or predetermination, you are advised to seek advice prior to the meeting.


### **Section 106 of the Local Government Finance Act, 1992 - Declarations which restrict Members in Council Tax arrears, for at least a two months from voting**

In such circumstances the member may not vote on any reports and motions with respect to the matter.

## **APPENDIX A: Definition of a Disclosable Pecuniary Interest**

(Relevant Authorities (Disclosable Pecuniary Interests) Regulations 2012, Reg 2 and Schedule)

Subject	Prescribed description
Employment, office, trade, profession or vacation	Any employment, office, trade, profession or vocation carried on for profit or gain.
Sponsorship	Any payment or provision of any other financial benefit (other than from the relevant authority) made or provided within the relevant period in respect of any expenses incurred by the Member in carrying out duties as a member, or towards the election expenses of the Member. This includes any payment or financial benefit from a trade union within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992.
Contracts	Any contract which is made between the relevant person (or a body in which the relevant person has a beneficial interest) and the relevant authority— (a) under which goods or services are to be provided or works are to be executed; and (b) which has not been fully discharged.
Land	Any beneficial interest in land which is within the area of the relevant authority.
Licences	Any licence (alone or jointly with others) to occupy land in the area of the relevant authority for a month or longer.
Corporate tenancies	Any tenancy where (to the Member's knowledge)— (a) the landlord is the relevant authority; and (b) the tenant is a body in which the relevant person has a beneficial interest.
Securities	Any beneficial interest in securities of a body where— (a) that body (to the Member's knowledge) has a place of business or land in the area of the relevant authority; and (b) either—  (i) the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body; or  (ii) if the share capital of that body is of more than one class, the total nominal value of the shares of any one class in which the relevant person has a beneficial interest exceeds one hundredth of the total issued share capital of that class.

Non-Executive Report of the:  <b>Licensing Committee</b>	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Tom Lewis Service Manager – Regulatory Services (Commercial)	<b>Classification:</b> Unrestricted
<b>Cumulative Impact Assessment Policy 2024 - 2027</b>	

<b>Originating Officer(s)</b>	<b>Tom Lewis</b> <b>Service Manager – Regulatory Services</b>
<b>Wards affected</b>	Spitalfields and Banglatown, Whitechapel, Weavers, and Bethnal Green West

## 1. Executive Summary

- 1.1 The Council as a Licensing Authority must review its Cumulative Impact Policies every 3 years. The Council has two Cumulative Impact Policies or Cumulative Impact Assessments (CIA) as they are now referred to in the legislation and government guidance. The Council’s first CIA in Brick Lane was introduced in November 2014, with the second CIA being introduced around Bethnal Green in November 2018.
- 1.2 The Cumulative Impact Assessment forms part of the Council’s Statement of Licensing Policy and therefore if the reviewed CIA Policy is adopted, then the Statement of Licensing Policy will be updated to reflect this change.
- 1.3 As part of the review of the Cumulative Impact Assessments a statutory consultation process took place between the 31<sup>st</sup> January and 25<sup>th</sup> April 2024. If the below recommendations are accepted, the reviewed Cumulative Impact Assessment, which forms part of the Statement of Licensing Policy, will ultimately go to full Council for adoption.

## 2. Recommendations:

The Licensing Committee is recommended to:

- 2.1 Note the proposed the reviewed Cumulative Policy, that will be put before full Council on 20<sup>th</sup> November 2024, and which can be found in **Appendix One**.

### **3. REASONS FOR THE DECISIONS**

- 3.1 The Council is statutorily required to review its Cumulative Impact Assessments every 3 years. As part of the review a statutory consultation must take place.

### **4. ALTERNATIVE OPTIONS**

- 4.1 This is a noting report.

### **5. DETAILS OF THE REPORT**

- 5.1 The Council's current Cumulative Impact Assessments for Brick Lane and Bethnal Green were adopted by Full Council in November 2020.
- 5.2 Tower Hamlets Council is defined as a Licensing Authority under the Licensing Act 2003. As a Licensing Authority we must review our Cumulative Impact Assessments every 3 years and publish the outcome of that review.
- 5.3 We must, as a minimum carry out the statutory consultation laid down in the Licensing Act 2003.
- 5.4 Following consultation, Cabinet must consider the revised Cumulative Impact Assessments (CIAs), which form part of the Statement of Licensing Policy. Full Council must make the final decision on whether to retain the reviewed Cumulative Impact Assessment Brick Lane and remove the CIA for Bethnal Green.
- 5.5 The Cumulative Impact Assessments (CIAs) seek to help reduce the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises is having a cumulative impact and leading to problems, which are undermining the licensing objectives:
- Prevention of crime and disorder,
  - Public safety,
  - Prevention of public nuisance,
  - Protection of children from harm.
- 5.6 CIAs can relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area.
- 5.7 The Statement of Licensing Policy is prescribed by central government in its guidance to Local Authorities. The policy produced must comply with guidance issued by central government. The current policy is compatible with this advice and guidance.
- 5.8 The review of the Brick Lane and Bethnal Green CIAs has taken account of the legislative changes that will affect the policy. The Policy has also been updated following the consultation.



## Consultation

5.9 All statutory consultees were consulted:

- a) the chief officer of police for the licensing authority's area,
- b) the fire and rescue authority for that area, i.e. the Fire Brigade
- c) The Council's Director of Public Health,
- d) such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority,
- e) such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority,
- f) such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority, and
- g) such other persons as the licensing authority considers to be representative of businesses and residents in its area.

5.10 As well as the above statutory consultees, and in connection with g) above, the main method of consultation was to direct residents and businesses to complete an online survey which was accessed via the Council's website (Let's Talk -). A printout of the page from website and online survey questions can be found in **Appendix Two**. The consultation ran from 31st January to 25th April 2024.

5.11 The full list of consultees is detailed in **Appendix Three**.

5.12 Online consultation received 318 visits, with 57 downloading the documents, and a total of 47 taking part in the survey. A Summary Report of the Online Survey Consultation can be found in **Appendix Four**.

5.13 The online survey asked 18 questions in relation to the review of the CIAs in Bethnal Green and Brick Lane. The tables below show the answers to the main important questions as a percentage for each CIA (Brick Lane and Bethnal Green).

Do you think that the Brick Lane Cumulative Impact Policy should be?					
	Retained and expanded as per the proposal detailed in the report	Retained in its current form (No change)	Retained and expanded further than detailed in the report	Retained but reduced	Removed
Brick Lane CIA (total responders = 47)	55.3%	23.4%	4.3%	6.4%	10.6%

Do you think that the Bethnal Green Cumulative Impact Policy should be??				
	Removed, as per the proposal detailed in the report	Retained in its current form	Retained and expanded	Retained but reduced
Bethnal Green CIA (total responders = 47)	40.4%	27.7%	27.7%	4.3%

- 5.14 The full Online Survey Responses Reports can be found in in **Appendix Five**. There were also fourteen (14) additional comments left by responders to the Online Survey. These additional comments can be read in their entirety in Appendix Five, however they have been tabulated in **Appendix Six**.
- 5.15 As well as the online responses, four (4) written responses were received via email. It should however be noted that one of these, which was from the Met Police Borough Commander was received after the closing date on the consultation on 3rd May 2024. This has been included in the responses as there is no clear reason not to include it given it was received very shortly after the close of consultation. It is clearly relevant to the issues and could be unfair if it were excluded.
- 5.16 The responses included one resident, one resident’s association and two responsible authorities. All four of them were in support of CIAs, however only two of the responses specifically mentioned whether they were in support of removal of the Bethnal Green CIA and retention of expansion of the Brick Lane CIA. Furthermore, two of these mentioned having another CIA around Ezra Street and Columbia Road. These written responses can be found in **Appendix Seven**, which includes a table summarising them.
- 5.17 As part of the consultation process the review of the Cumulative Impact Assessments (CIAs) was presented the Community Safety Partnership (CSP) meeting on 20th February 2024. CSP requested meetings to be held with Responsible Authorities. These meetings were held on 15th and 18th March 2024. Except for Public Health, no other responsible authorities invited attended these meetings.

#### Request for New/Extension of CIAs

##### Hackney Wick (New)

- 5.18 During the meeting with CSP on 20th February 2024 and at the meeting on 7th May 2024 Hackney Wick was raised in terms of whether a CIA could be introduced into this area. The Partnership group was advised that the current evidence does not support the introduction of the CIA within this area. **Appendix Eight** (Report: Review of the Cumulative Impact Policies (Licensing) in Brick Lane and Bethnal Green) contains hotspot maps produced from crime and 101 calls statics from the Metropolitan Police. These maps show the

hotspots from crime and 101 calls in Brick Lane and Bethnal Green CIAs are far higher than Hackney Wick. Moreover, the saturation of Licence Premises is less than the level of Bethnal Green CIA (approximately 48 premises), which this report is recommending to removed.

5.19 Although a CIA is not justified in this area the Council including, Regulatory Services (Commercial), Community Safety, and Parking are working with the Met Police to consider measures to prevent crime and disorder becoming a problem in this area.

Columbia Road and Bethnal Green (Extensions)

5.20 During the Consultation some of responses requested or referred to introducing areas of Columbia Road and Ezra Street as a CIA.

5.21 The review of the CIAs in Brick Lane and Bethnal Green did not include any proposal to extend into the areas around Columbia Road/Ezra Street. Therefore, to add a CIA as suggested would require another statutory consultation, where the Council would need to consider if there is good evidence that, in this case, crime and disorder or nuisance is occurring within the area.

5.22 This matter was raised previously when the current CIAs for Brick Land and Bethnal Green were reviewed in 2021. During this review it was investigated whether there was sufficient evidence to support the introduction of a further CIA within this area. The evidence did not support an introduction of a CIA within this area.

5.23 Figures 1 to 8 in Appendix 1 of **Appendix Eight** contains hotspot maps for 2020, 2021, 2022 and 2023 (end June), which show crimes reported and calls to police linked to the licensed trade for the whole borough. These maps have been taken from the Police Crime Report Analysis and Police Calls Analysis Report. These maps show that that areas around areas around Columbia Road and Ezra Street (top left of the maps between Brick Lane and Bethnal Green CIA) do not show significant hotspot relating to crime reports or police calls (101 calls).

5.24 The Table below shows the number of Licence Applications granted in the Columbia Road and Bethnal Green extensions. Please not that there were no applications granted in 2022 and 2023 (end of June).

5.25	5.26 2020	5.27 2021
5.28 Row Labels	5.29	5.30
5.31 Bethnal Green extension CIZ	5.32 2	5.33 3
5.34 Hearing grant with variation	5.35 1	5.36
5.37 Officer grant	5.38 1	5.39 3
5.40 Columbia Road extension CIZ	5.41 10	5.42 6
5.43 Hearing grant	5.44 2	5.45 2
5.46 Hearing grant with variation	5.47 3	5.48

5.49 Officer grant	5.50 5	5.51 4
5.52 Grand Total	5.53 12	5.54 9

5.55 This table shows that in comparison with Brick Lane CIA and Bethnal Green CIA, less licences are being granted in the proposed extension areas. (see Report in Appendix Eight (Report: Review of the Cumulative Impact Policies (Licensing) in Brick Lane and Bethnal Green). Moreover, the number of Licence as a total in these areas is far less than in the current CIAs. See figures below:

- Columbia Road extension = 30
- Bethnal Green extension = 14
- Brick Lane CIA = 244
- Bethnal Green CIA = 59

5.56 Based on the above it does not appear that there is currently a saturation of licensed premises in the area.

5.57 The tables below show the complaints received by the Environmental Health and Trading Standards Service in the Columbia Rad and Bethnal Green extensions between 2020 and 2023 (end of June).

#### Licensing Complaints

	2020	2021	2022	2023	Grand Total
Row Labels					
Bethnal Green extension CIZ	2	2	1		5
Columbia Road extension CIZ	20	18	9	4	51
<b>Grand Total</b>	<b>22</b>	<b>20</b>	<b>10</b>	<b>4</b>	<b>56</b>

#### Noise Complaints

	2020	2021	2022	2023	Grand Total
Row Labels					
Bethnal Green extension CIZ	1	4	2	1	8
Columbia Road extension CIZ	3	5	3	3	14
<b>Grand Total</b>	<b>4</b>	<b>9</b>	<b>5</b>	<b>4</b>	<b>22</b>

5.58 Though there is a similarity in the Columbia Road extension, this is for Licensing Complaints only and only for Bethnal Green, which this report is proposing to remove. In general complaints received in the Brick Lane and Bethnal Green CIA are considerably more than can be seen here Appendix Eight (Report: Review of the Cumulative Impact Policies (Licensing) in Brick Lane and Bethnal Green).

5.59 In conclusion there is not saturation of licensed premises within these proposed extensions. Therefore, with this and complaints and crime and 101 calls hot spot maps there is not sufficient evidence to support the introduction of CIAs in these areas.

## Conclusion

- 5.60 The Consultation Report of the Review of the Cumulative Impact Policies (Brick Lane and Bethnal Green), found in appendix Eight outlines the evidence in regard to the CIAs, and considers figures from the crimes reported and 101 call data for Bethnal Green CIA with those in Brick Lane CIA. This shows that within the Brick Lane CIA crime and calls to the police via 101 are significantly higher than those in Bethnal Green CIA. The difference is even more apparent when looking at the hotspot maps in Figures 1 to 8 in Appendix 1 of this Report. These show the hotspot maps of the whole borough for 2020, 2021, 2022 and 2023 (end June) crimes reported, and 101 Calls received linked to the licensed trade, which have been taken from Police Crime Report Analysis and Police Calls Analysis Report. The area around Brick Lane is significantly greater in terms of saturation of licensed premises and the hotspots of crimes and calls to police linked to the licence trade than other areas of the borough including the Bethnal Green CIA. Furthermore, the Hot Spot Maps within the above-mentioned report show evidence to increase the area of the Brick Lane CIA to its southeastern edge.
- 5.61 Considering the above and the consultation responses there is sufficient evidence to retain and expand the CIA in Brick Lane. Conversely, there is insufficient evidence to retain the CIA around Bethnal Green.
- 5.62 Finally, it should be noted that the Brick Lane CIA was expanded in 2018 on its northwestern edge in order to meet with the London Borough of Hackney's Shoreditch CIA.

## **6. EQUALITIES IMPLICATIONS**

- 6.1 There are no adverse equalities implications.

## **7. OTHER STATUTORY IMPLICATIONS**

- 7.1 Best Value: recent legislation, such as the Localism Act 2010 has encouraged communities and the Local Authority to work in partnership. The Cumulative Impact Assessment in Brick Lane will assist in a reduction of enforcement and regulatory action, thus reducing costs for these Services.
- 7.2 Risk Management: there will be two days, 18th and 19th November 2024, where the Council will effectively not have a Cumulative Impact Policy. This means that there will be no rebuttable presumption that an application being heard by the Licensing Sub-Committee will be refused unless it can be shown that there will be no negative cumulative effect on the licensing objectives in the CIAs. However, residents and responsible authorities can still use the evidence supporting the CIA for Brick Lane within their objections to applications within this CIA zone.
- 7.3 Crime Reduction: One of the key licensing objectives this policy considers is the prevention of crime and disorder associated with Licensed Premises. The policy

supports and assists with crime and disorder reduction by placing greater controls upon those licences that are granted in the CIA. This is achieved by licences having more stringent license conditions added by either the applicant or the Licensing Sub-Committee.

- 7.4 Safeguarding: The Statement of Licensing Policy which this Policy is an appendix of, takes into account the safeguarding of children and violence against women and children.

## **8. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 8.1 There are no additional resource implications arising from this report. Resources required to fulfil Councils duties in respect of Licensing process and Cumulative Impact Assessments will be met from existing budgets.

## **9. COMMENTS OF LEGAL SERVICES**

- 9.1 Section 4(1) of the Licensing Act 2003 (“the Act”) requires licensing authorities to carry out their functions under the Act with a view to promoting the four licensing objectives: the prevention of crime and disorder; public safety; the prevention of public nuisance; the protection of children from harm.
- 9.2 Section 5 requires the authority to publish a statement of licensing policy every five years. The current policy came into force on 1st November 2023 and will last until 31st October 2028.
- 9.3 Section 5A of the Act permits an authority to publish a cumulative impact assessment stating that it considers the number of relevant authorisations (premises licences and club premises certificates) in respect of premises in one or more parts of its area as described in the assessment is such that it is likely that the grant of further relevant authorisations in respect of premises in that part or those parts would be inconsistent with its duty under section 4(1). Section 5A(7) provides that where a licensing authority has published a cumulative impact assessment it must, within three years, consider whether it remains of the opinion stated in the assessment. Essentially, this means that it is the concentration of licensed premises in an area giving rise to an impact on one or more of the licensing objectives, rather than being capable of being attributed to any specific licensed premises. The effect of such a policy, if approved, is to reverse the presumption in favour of granting an application relating to a premises within the area. The applicant is required to demonstrate that the grant of their application will not adversely impact upon one or more of the licensing objectives. It should be noted that this does not negate the need for a relevant representation to be made in order to engage the policy. If no such representation is made, the application would fall to be granted under delegated powers.
- 9.4 Before deciding whether it remains of that opinion, the licensing authority is required to consult with the statutory consultees listed in s.5(3), which includes the chief officer of police for the area, the fire and rescue authority, those who the authority considers to be representative of holders of premises licences,

personal licences and club premises certificates issued by the authority, and such other persons as the licensing authority considers to be representative of businesses and residents in its area. The report evidences that the consultation requirements have been complied with.

- 9.5 With respect to the consultation the following principles must be applied:
- the consultation should take place when proposals are still at a formative stage;
  - the proposer must give sufficient reasons for any proposal to allow for intelligent consideration and response;
  - adequate time must be given to both consider and respond to the proposal;
  - the product of the consultation must be conscientiously taken into account when the decision is made.

These requirements have been met.

- 9.6 If the authority is no longer of the opinion that the assessment should remain in force, it must publish a statement to that effect. If the authority's opinion is not changed, it must revise the cumulative impact assessment so as to include a statement to that effect and set out the evidence why the authority remains of that opinion. The authority must publish any revision of a cumulative impact assessment. It is noted that the recommendations are to retain and expand the Brick Lane CIZ and to remove the Bethnal Green CIZ in its entirety.

- 9.7 Paragraphs 14.20 to 14.46 of the Secretary of State's guidance issued under section 182 of the Licensing Act 2003 addresses issues of cumulative impact and the steps to be taken in both adopting an assessment and reviewing an existing assessment. Paragraphs 14.29 to 14.33 set out the need for a robust evidential basis for such an assessment. There is sufficient evidence upon which the Council can decide to extend the Brick Lane CIA and to remove the Bethnal Green CIA.

Section 149 of the Equality Act 2010 requires public authorities, when carrying out its functions, to have "due regard" to this duty. This requires the authority to have regard to the need:

- to eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Equality Act 2010;
- to advance equality of opportunity between persons sharing a relevant protected characteristic (such as age, race, or disability) and those that do not;
- to foster good relations between persons sharing a relevant protected characteristic and those that do not.

- 9.8 The duty does not require the authority to achieve a particular result. The duty must be considered at the time that the decision is made and must be conducted with rigour, with an open mind, and not considered to be merely a box-ticking exercise. It is noted that an Equalities Impact Assessment has been carried out and has not indicated any specific equality issues arising.

## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- Lead Member 1-1 Environment and Climate Emergency - Cllr Kabir Hussain - 22 November 2023

### **Appendices**

#### **10. APPENDICES**

Appendix One:	Reviewed CIA Policy Statement
Appendix Two:	Let's Talk Consultation Webpage and Online Survey Questions
Appendix Three:	List of Consultees
Appendix Four:	Summary Online Consultation Report
Appendix Five:	Full Online Consultation Reports
Appendix Six:	Table of Online Survey Additional Comments
Appendix Seven:	Written Consultation Responses and Summary
Appendix Eight:	Consultation Report of the Review of the Cumulative Impact Policies (Brick Lane and Bethnal Green)
Appendix Nine:	Equalities Impact Analysis Screening

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#### **Local Government Act, 1972 Section 100D (As amended)**

#### **List of "Background Papers" used in the preparation of this report**

List any background documents not already in the public domain including officer contact information.

- Crime Report Analysis 2020 – 2023
- Police Calls Analysis 2020 - 2023



## **Appendix One – Reviewed Cumulative Impact Policy Statement**

### **9 Special Cumulative Assessment Policy**

- 9.1 The Licensing Authority has adopted a special policy relating to cumulative impact within the area of Brick Lane.

**This special policy creates a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates, which are likely to add to the existing cumulative impact, will normally be refused following the receipt of representations unless the applicant can demonstrate in the operation schedule that there will be no negative cumulative impacts with one or more of the licensing objectives.**

- 9.2 The Council reviewed the Special Cumulative Impact Policy in 2024 and, following consultation, decided to retain and expand the area of the Brick Lane CIA to its southeastern edge. This was because the Council was of opinion that the concentration of licensed premises within Brick Lane area in 9.14 (Figure One) below, was having a cumulative impact on the licensing objectives of crime and disorder and prevention of public nuisance.
- 9.3 The review further found that following consultation, the Council was no longer of the opinion that the grant of further relevant authorisations in respect of premises within the Bethnal Green area would be inconsistent with its duty under section 4(1) of the Licensing Act 2003.

#### **Review of Cumulative Impact Assessment (CIA) - Supporting Evidence**

- 9.4 In determining the Council's CIA for the area of Brick Lane (Figure One) the Council considered the following evidence:
- Police data gathered from Crime Reports and Calls to 101 Service linked to Licence trade in the borough for 2020 to 2023 (end of June).
  - London Ambulance Service (LAS) Call Out Data linked to alcohol for the borough for 2020 to 2023 (end of June).
  - Complaint data from Environmental Health and Trading Standards relating to Noise and Licensing for 2020 to 2023 (end of June).
  - Hot spot maps with following layers for data collected between 2020 and 2023 (end of June) linked to Licence trade/alcohol:
    - Licensed Premises locations,
    - Police Crime and 101 data,
    - LAS Call out data,
    - Environmental Health and Trading Standards complaint data.
  - Licence Application data for the defined areas for 2020 to 2023
  - Results of the Consultation, that included Survey data and comments and written responses.

This evidence is published on our website [\[add link to Council Hearing\]](#).

## Brick Lane Cumulative Impact Assessment (CIA)

- 9.5 The Licensing Authority is of the view that the number, type and density of premises selling/supplying alcohol for consumption on and off the premises and/or the provision of late night refreshment in the Brick Lane Area (highlighted in Figure One of para 9.14 below) is having a cumulative impact on the licensing objectives. Therefore, it is likely that granting new licences, and significant variations of existing licences, would be inconsistent with the authority's duty to promote the licensing objectives. Thus, it has declared a cumulative impact assessment within this area.
- 9.6 The Brick Lane CIA aims to manage the negative cumulative impact of the concentration of licensed premises in this area and the stresses that the saturation of licensed premises has had on the local amenity, environmental degradation and emergency and regulatory services in managing this impact.
- 9.7 The effect of this CIA will apply to the following types of applications:
- New Premises Licences applications,
  - New Club Premises Certificates applications
  - Provisional Statements,
  - Variation of Premises Licences and Club Premises Certificate applications (where the modifications are relevant to the issue of cumulative impact for example increases in hours or capacity).

However, it will only apply where the application seeks to permit the Licensable activities of:

- the sale or supply of alcohol for consumption on or off the premises, and/or,
  - the provision of late night refreshment.
- 9.8 **This Policy will be strictly applied and where relevant representations are received, the presumption of the Council is that the application will be refused. Applicants will need to demonstrate that there are exceptional circumstances and that granting their application will not negatively add to the cumulative effect on the Licensing Objectives within the Brick Lane CIA if they wish to rebut this presumption.**
- 9.9 The CIA creates a rebuttable presumption that where relevant representations against applications within the CIA zone are received by one or more of the responsible authorities, and/or other persons (e.g. Councillors, Members of the Public), the application will be refused.
- 9.10 Where representations have been received in respect to applications within the CIA zone the onus is on the applicant to adequately rebut the presumption.

9.11 It must be stressed that the presumption created by this CIA does not relieve responsible authorities or other persons of the need to make a representation. If there are no representations, the licensing authority must grant the application in terms that are consistent with the operating schedule submitted, in line with their delegated authority.

9.12 This special policy is not absolute, and the Licensing Authority recognises that it needs to balance the needs of businesses with local residents. The circumstances of each application will be considered on its merits and the Licensing Authority shall grant applications when representations are not received. The applicant should demonstrate that the operation of the premises will not add to the cumulative impact on one or more of the following licensing objectives:

- Prevention of Crime and Disorder;
- Prevention of Public Nuisance.

Therefore, applicants will be expected to comprehensively demonstrate why a new or varied licence will not add to the cumulative impact. They are strongly advised to give consideration to mitigating potential cumulative impact issues when setting out steps they will take to promote the licensing objectives in their operating schedule.

9.13 The Cumulative Impact Assessment (CIA) will not be used to revoke an existing licence or certificate and will not be applicable during the review of existing licences.

#### **Possible exceptions to the Brick Lane Cumulative Impact Assessment (CIA)**

- Applications for licences for small premises with a capacity of fifty persons or less who only intend to operate within framework hours, and that;
  - Only have consumption of food (late night refreshment) and/or drink (alcohol) on the premises only,
  - and,
  - Have arrangements to prevent vertical drinking, for example fully seated venues,
  - Only provide Off sales of food (late night refreshment) and/or drink (alcohol) for delivery (i.e. not for take away),
- Applications for licences that are not alcohol led (e.g. Hairdressers wanting to provide alcohol to clients during their hair cut/treatments),
- Applications for licences where the applicant has recently surrendered a licence for another premises of a similar size and providing similar licensable activities in the CIA Area.

The Licensing Authority will **not** consider the following as possible exceptions:

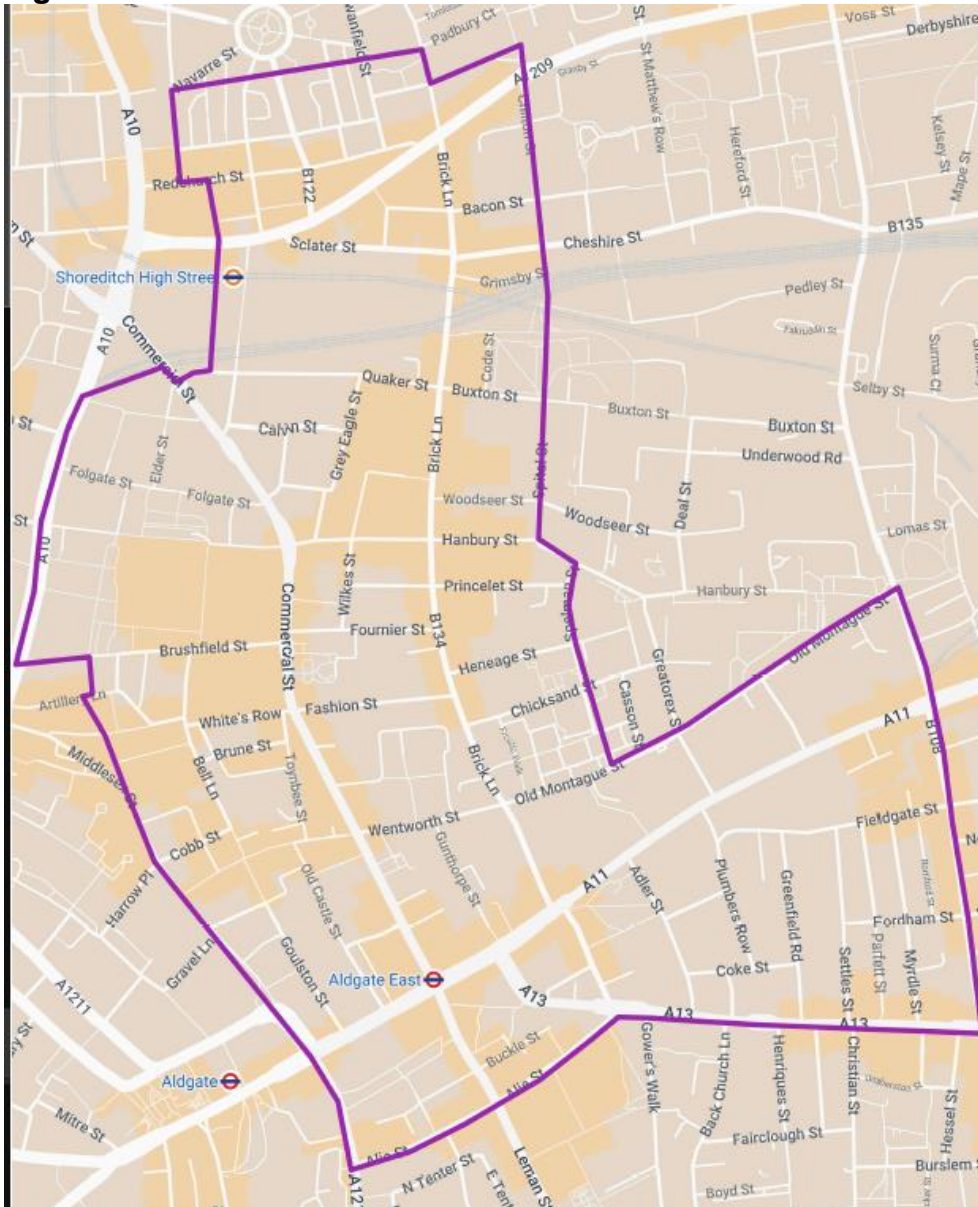
- that the premises will be well managed and run,

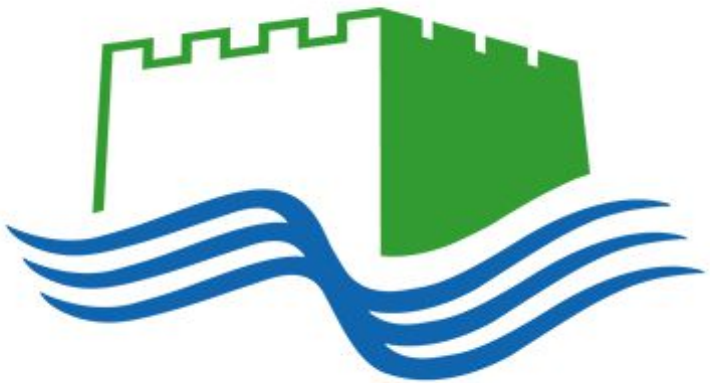
- that the premises will be constructed to a high standard,
- that the applicant operates similar premises elsewhere without complaint.

## The Cumulative Impact Assessment (CIA) Area for the Brick Lane

9.14 The Cumulative Impact Assessment Areas are detailed in the maps below.

**Figure One – Brick Lane CIZ**




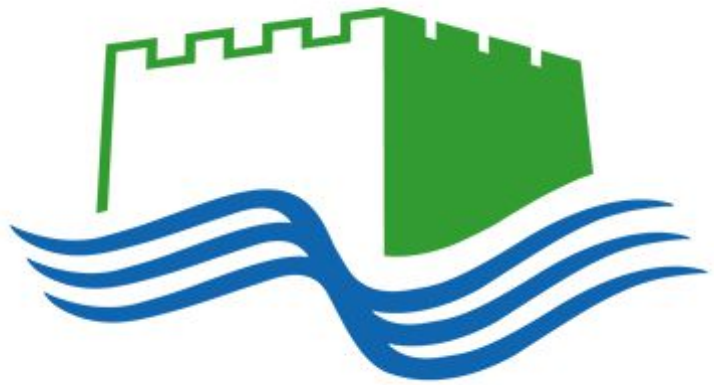


## TOWER HAMLETS

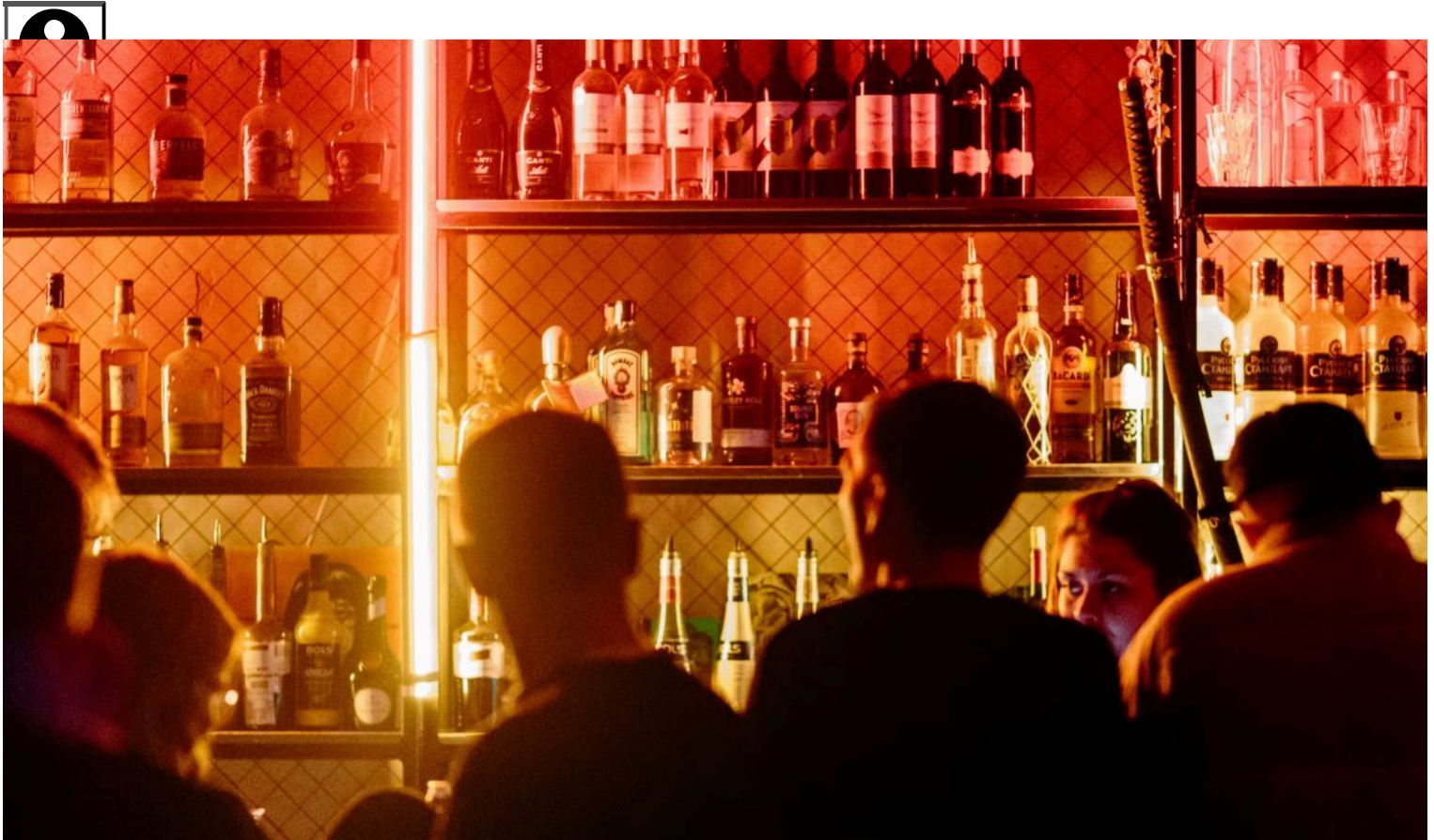
- Home
- All consultations
- Council website
  - News and events
  - Council meetings
  - Our approach to consultation and engagement
  - Past consultations (before March 2020)
  - Planning applications
- You said, we did
- Contact us

Search

-  Tom Lewis
  - My Account
  - Edit project
  - Projects
  - Dashboard
  - Logout



**TOWER HAMLETS**



[Home](#) / [Cumulative Impact Policy Review 2024](#)

# Cumulative Impact Policy Review 2024



The Council is consulting on the future of the Cumulative Impact Policy, whereby it looks at limiting the number of alcohol, and late night refreshment licences within specific areas of Brick Lane and Bethnal Green.

This consultation is required before the Council decides whether to revoke the designations or continue with them.

**The consultation surveys for Bethnal Green and Brick Lane will run for 12 weeks commencing on 31st January 2024 and finishing on 25th April 2024 at 23:59 hours.**

The objective of the Cumulative Impact Policy is to reduce crime and disorder and public nuisance in areas with a high saturation of licensed premises.

Having a Cumulative Impact Policy means that people wishing to apply for a new or variation of a licence to sell alcohol and/or provide late night refreshment (hot food/drink between 11pm and 5am) must demonstrate that they will not add to or have a cumulative effect on issues such as public nuisance and crime and disorder in the designated areas.

Essentially it means that any applicant that wishes to apply for a licence under the Licensing Act 2003 within a Cumulative Impact Zone must prove that they will not add to the detriment of the area.

In November 2014, the current Cumulative Impact Policy was designated in and around the Brick Lane area. In 2018 second designation was introduced in Bethnal Green. The reason the Council chose to introduce these policies in Tower Hamlets was due to the saturation of licensed premises within this area, alcohol related crime and disorder and public nuisance that was shown to be linked to licensed premises. We now have to consider whether to keep, amend or remove one or both of these policies.

The Cumulative Impact Policy for Brick Lane has been in place now for seven years, and in Bethnal Green for two years. Since its introduction incidents of crime and antisocial behaviour linked to licensed premises within these areas have seen a reduction, though, there has been a slight increase since 2020.

The [Review of the Cumulative Impact Policies \(Licensing\) in Brick Lane and Bethnal Green report](#) looks at the data relating to Crime/Anti-social Behaviour, London Ambulance Call Outs, and Complaints received by the Council between 2020 to end of June 2023. The report and [GIS Data Map](#) shows that the evidence supports the retention of and expansion of the Brick Lane Cumulative Impact Assessment (CIA) at its southern edge, and the removal of the Bethnal Green CIA.

You may also wish to see the [Minutes and Report of the Cabinet Meeting on 17<sup>th</sup> November 2021](#) where the previous Cumulative Impact Assessments for Brick Lane and Bethnal Green were retained.

The current Cumulative Impact Policy for Brick Lane and Bethnal Green can be found in Appendix 5 of the [Council's Statement of Licensing Policy 2023 – 2028](#).

In connection with this statutory consultation, we are seeking your views for the Brick Lane and Bethnal Green areas.





BRICK LANE...

CLOSED: This survey has concluded.

## Cumulative Impact Policy Review Survey


47 responses

Take Survey

Page last updated: 07 May 2024, 11:15 AM

### Review of the Cumulative Impact Policies (Licensing) in Brick Lane and Bethnal Green

 [CIA,Consultation,Report,23,v1,pdf \(1,88 MB\) \(pdf\)](#)

### GIS Data Map

 [GIS Data Map](#)

[Terms and conditions](#)

[Privacy policy](#)

[Moderation policy](#)

[Accessibility](#)

[Technical support](#)



[Site map](#)

[Cookie Policy](#)





**London Borough of Tower Hamlets**

**Statement of Licensing Policy, Cumulative Impact Policy Review Consultation 2024**

**Survey Questions**

1. In general, what effect would you say the Cumulative Impact Policies have had on the areas?


**B**   *I*   U   ☰   🔗   🖼️   </>

- Positive 
- Negative 
- None (no effect) 
- Don't know 


## 2 Brick Lane Cumulative Impact Policy

3. Do you think that the Brick Lane Cumulative Impact Policy should be?


**B** *I* U    


Retained and expanded as per the proposal detailed in the repo 


*Skip to Q4*

Retained in its current form 

*Skip to Q4*

Retained and expanded further than detailed in the report 

Retained but reduced 

Removed 

3.1. If you think that the Brick Lane Cumulative Impact zone should be reduced, Please detail the extent of the reduction?

**B** *I* U    

e.g. Participant long response

3.2. If you think that the Brick Lane Cumulative Impact area/zone should be expanded, please detail the extent of the expansion

**B** *I* U    

e.g. Participant long response

#### 4 Brick Lane Cumulative Impact Area - Crime, Disorder and Noise Nuisance

5. How often do you visit licensed premises in Brick Lane Cumulative Impact area?

**B** *I* U    

- At least once a week 
- At least once every 2 weeks 
- At least once a month 
- Less than once a month 
- Less than every 6 months 
- Less than once a year 
- Hardly ever 

6. Which of the following best describes you in reference to the the Brick Lane Cumulative Impact Area?

**B** *I* U    

Customer/visitor



Worker



Local Resident



7. Have you experienced crime and disorder or noise nuisance that could be reasonably linked to premises licensed to sell alcohol within the Brick Lane Cumulative area?

**B** *I* U    

Yes - Crime and disorder only



Yes - Noise nuisance only



Yes - Crime and disorder and noise nuisance



Not experienced any crime and disorder or noise nuisance







*Skip to Q10*

8. What type of premises in the Brick Lane Cumulative Impact Area was the crime and disorder linked to?

Please select all appropriate:





**B** *I* U    

- Pub, Bar etc. - Alcohol to be drunk on the premises 
- Off Licence - Alcohol to be drunk away from the premises 
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Aw 
- Don't know 

9. What type of premises in the Brick Lane Cumulative Impact Area was the noise nuisance linked to?

Please select all appropriate:

**B** *I* U    

- Pub, Bar etc. - Alcohol to be drunk on the premises 
- Off Licence - Alcohol to be drunk away from the premises 
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Aw 
- Don't know 

## 10 Bethnal Green Cumulative Impact Policy

11. Do you think that the Bethnal Green Cumulative Impact Policy should be?

**B** *I* U    

Removed, as per the proposal detailed in the report



*Skip to Q12*

Retained in its current form



Retained and expanded



Retained but reduced





11.1. If you think that the Bethnal Green Cumulative Impact zone/area should be retained and reduced, please detail reasons for retaining and reducing the zone, and the extent of the reduction.

**B** *I* U    

e.g. Participant long response

11.2. If you think that the Bethnal Green Cumulative Impact area/zone should be retained and expanded, please detail the reasons for retaining and expanding the zone, and the details of the expansion.

**B** *I* U    

e.g. Participant long response

11.3. If you think that the Bethnal Green Cumulative Impact area/zone should be retained in its current form, please details the reasons for retaining it.

**B** *I* U    

e.g. Participant long response

## 12 Bethnal Green Cumulative Impact Area - Crime, Disorder and Noise Nuisance

13. How often do you visit licensed premises in Bethnal Green Cumulative Impact area?

**B** *I* U    

At least once a week



At least once every 2 weeks



At least once a month



Less than once a month



Less than every 6 months



Less than once a year



Hardly ever



14. Which of the following best describes you in reference to the the Bethnal Green Cumulative Impact Area?

**B** *I* U ☰ ▾ 🔗 🖼️ </>

Customer/visitor



Worker



Local Resident



15. Have you experienced crime and disorder or noise nuisance that could be reasonably linked to premises licensed to sell alcohol within the Bethnal Green Cumulative area?

**B** *I* U ☰ ▾ 🔗 🖼️ </>

Yes - Crime and disorder only



Yes - Noise nuisance only



Yes - Crime and disorder and noise nuisance



Not experienced any crime and disorder or noise nuisance



*Skip to Q18*

16. What type of premises in Bethnal Green Cumulative Impact area was this was the crime and disorder linked to?

Please select all appropriate:

**B** *I* U ☰ ▾ 🔗 🖼️ </>

- Pub, Bar etc. - Alcohol to be drunk on the premises 
- Off Licence - Alcohol to be drunk away from the premises 
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Away 
- Don't know 

17. What type of premises in the Bethnal Green Cumulative Impact Area was the noise nuisance linked to?

Please select all appropriate:

**B** *I* U ☰ ▾ 🔗 🖼️ </>

- Pub, Bar etc. - Alcohol to be drunk on the premises 
  - Off Licence - Alcohol to be drunk away from the premises 
  - Late Night (after 11pm) Hot Food Café/Restaurant or Take Away 
  - Don't know 
- 
- Other (please specify)

18. If wish to make further comments please detail them below or alternatively email the Licensing Team via [Licensing@towerhamlets.gov.uk](mailto:Licensing@towerhamlets.gov.uk).

---

**B** *I* U    

e.g. Participant long response

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## **Appendix Three – List of Consultants**

### **Reviewed Cumulative Impact Assessment (CIA)**

1. Metropolitan Police Borough Commander - Tower Hamlets
2. Director of Public Health, London Borough of Tower Hamlets
3. London Fire Brigade
4. All Licensees holding a Premises License or Club Premises Certificate
5. All Holders of Personal Licensed with the London Borough of Tower Hamlets
6. Deputy Mayor for Policing and Crime (MOPAC)
7. Trading Standards, Environmental Health and Trading Standards, London Borough of Tower Hamlets
8. Environmental Protection (Noise), Environmental Health and Trading Standards, London Borough of Tower Hamlets
9. Licensing and Safety Team, Environmental Health and Trading Standards, London Borough of Tower Hamlets
10. Child Protection, London Borough of Tower Hamlets
11. Development Control, London Borough of Tower Hamlets
12. Tidal River Thames Port of London Authority
13. Navigation Authority Canal & River Trust
14. Health and Safety Executive (HSE)
15. Maritime & Coastguard Agency
16. Home Office Immigration Enforcement
17. Ezra Street Residents Association
18. Spitalfield Residents Association (SPIRE)
19. St Georges Residents Association
20. Institute of Licensing (IoL)
21. Council of Mosques
22. Adult Care, London Borough of Tower Hamlets
23. UK Hospitality
24. Best Bar None (BBN)
25. Beer in the Evening
26. GLA and Night Tzar
27. Safer Neighbourhoods Board
28. London Borough's of Hackney, Newham, Southwark, Lewisham
29. Royal Borough of Greenwich
30. City of London
31. Licensing Committee Members
32. Arts Parks and Events, London Borough of Tower Hamlets
33. Community Safety, London Borough of Tower Hamlets
34. Growth & Economic Development, London Borough of Tower Hamlets
35. MASH (Child Safeguarding), London Borough of Tower Hamlets
36. Democratic Services, London Borough of Tower Hamlets
37. Legal Services, London Borough of Tower Hamlets
38. Violence Against Women and Girls (VAWG) Team, London Borough of Tower Hamlets
39. National Society for the Prevention of Cruelty to Children (NCPCC)
40. NHS Tower Hamlets Clinical Commissioning Group
41. Young Mayor, London Borough of Tower Hamlets#
42. Pub Watch Chairs (Brick Lane, Bethnal Green, Hackney Wick, Canary Wharf).

#### **Other Media Channels:**

43. Members Bulletin
44. Business Support New Letter

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# Summary Report

26 February 2020 - 02 July 2024

## Let's Talk Tower Hamlets

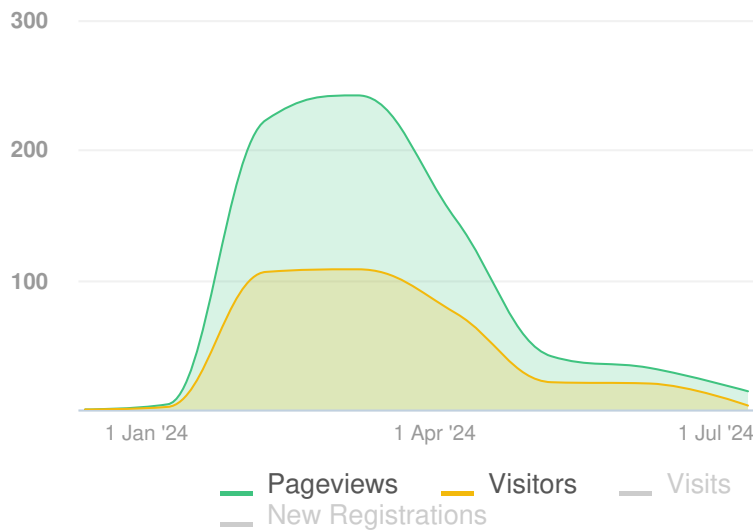
PROJECTS SELECTED: 1

Cumulative Impact Policy Review 2024

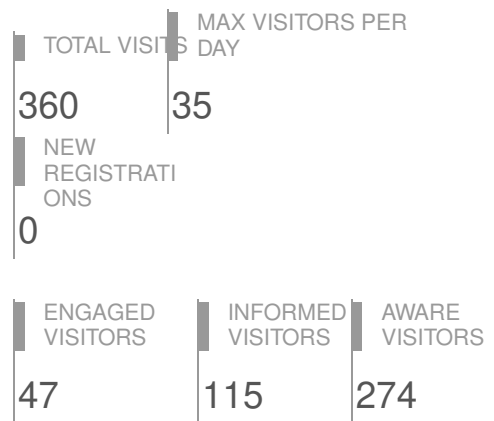
FULL LIST AT THE END OF THE REPORT



### Visitors Summary



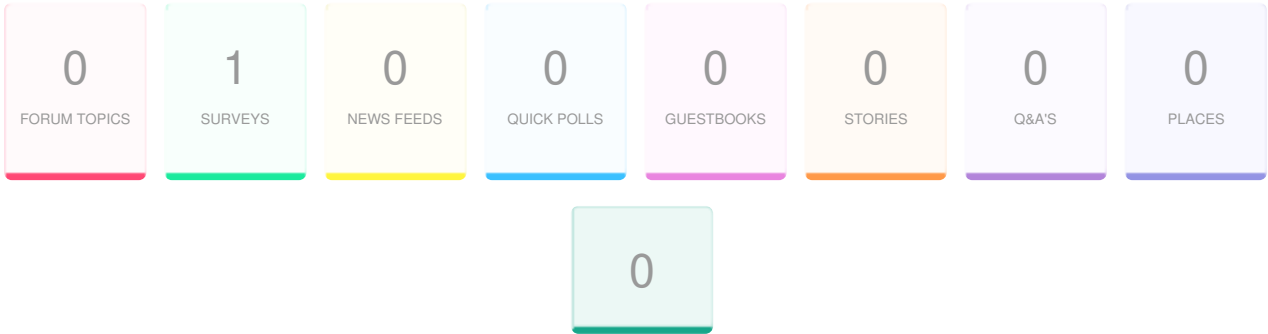
### Highlights



## PARTICIPANT SUMMARY

<b>ENGAGED</b>	<b>47 ENGAGED PARTICIPANTS</b>			(%)
<b>INFORMED</b>	Registered	Unverified	Anonymous	
	Contributed on Forums	0	0	0
	Participated in Surveys	1	0	46
	Contributed to Newsfeeds	0	0	0
<b>AWARE</b>	Participated in Quick Polls	0	0	0
	Posted on Guestbooks	0	0	0
	Contributed to Stories	0	0	0
	Asked Questions	0	0	0
	Placed Pins on Places	0	0	0
	Contributed to Ideas	0	0	0
<i>* A single engaged participant can perform multiple actions</i>				<i>* Calculated as a percentage of total visits to the Project</i>
Cumulative Impact Policy R... 47 (17.2%)				
<b>ENGAGED</b>	<b>115 INFORMED PARTICIPANTS</b>			(%)
<b>INFORMED</b>	Participants			
	Viewed a video	0		
	Viewed a photo	0		
	Downloaded a document	52		
<b>AWARE</b>	Visited the Key Dates page	0		
	Visited an FAQ list Page	0		
	Visited Instagram Page	0		
	Visited Multiple Project Pages	68		
	Contributed to a tool (engaged)	47		
<i>* A single informed participant can perform multiple actions</i>				<i>* Calculated as a percentage of total visits to the Project</i>
Cumulative Impact Policy R... 115 (42.0%)				
<b>ENGAGED</b>	<b>274 AWARE PARTICIPANTS</b>			
<b>INFORMED</b>	Participants			
	Visited at least one Page	274		
<b>AWARE</b>				274
	<i>* Aware user could have also performed an Informed or Engaged Action</i>			
Cumulative Impact Policy R... 274				
				<i>* Total list of unique visitors to the project</i>

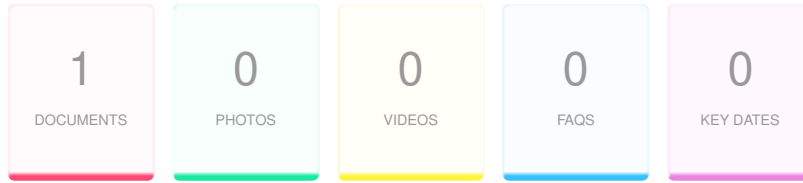
## ENGAGEMENT TOOLS SUMMARY



SURVEYS SUMMARY	
1	Surveys
47	Contributors
47	Submissions

TOP 3 SURVEYS BASED ON CONTRIBUTORS
<p><b>47</b> Contributors to Cumulative Impact Policy Review Survey</p>

## INFORMATION WIDGET SUMMARY



DOCUMENTS	
1	Documents
52	Visitors
63	Downloads

TOP 3 DOCUMENTS BASED ON DOWNLOADS
63 Downloads CIA.Consultation.Report.23.v1.pdf

## TRAFFIC SOURCES OVERVIEW

REFERRER URL	Visits
www.google.com	77
lnks.gd	30
www.towerhamlets.gov.uk	19
www.bing.com	14
android-app	1
content.govdelivery.com	1
duckduckgo.com	1
l.instagram.com	1
researchbriefings.files.parliament.uk	1
www.google.co.uk	1

## SELECTED PROJECTS - FULL LIST

PROJECT TITLE	AWARE	INFORMED	ENGAGED
Cumulative Impact Policy Review 2024	274	115	47

# Cumulative Impact Policy Review Survey

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## **SURVEY RESPONSE REPORT**

26 February 2020 - 01 May 2024

### **PROJECT NAME:**

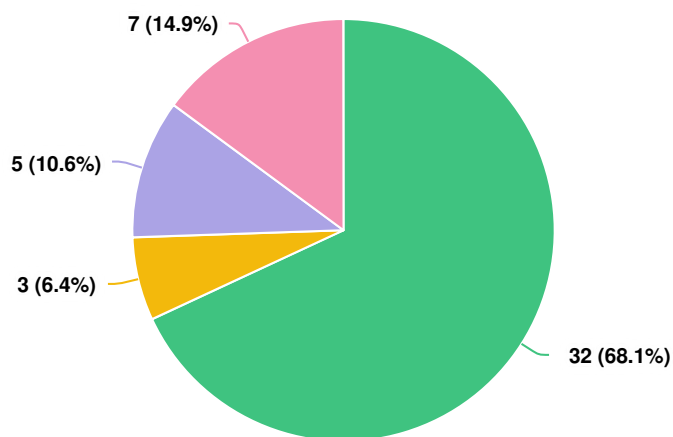
Cumulative Impact Policy Review 2024



SURVEY QUESTIONS



**Q1** | In general, what effect would you say the Cumulative Impact Policies have had on the areas?

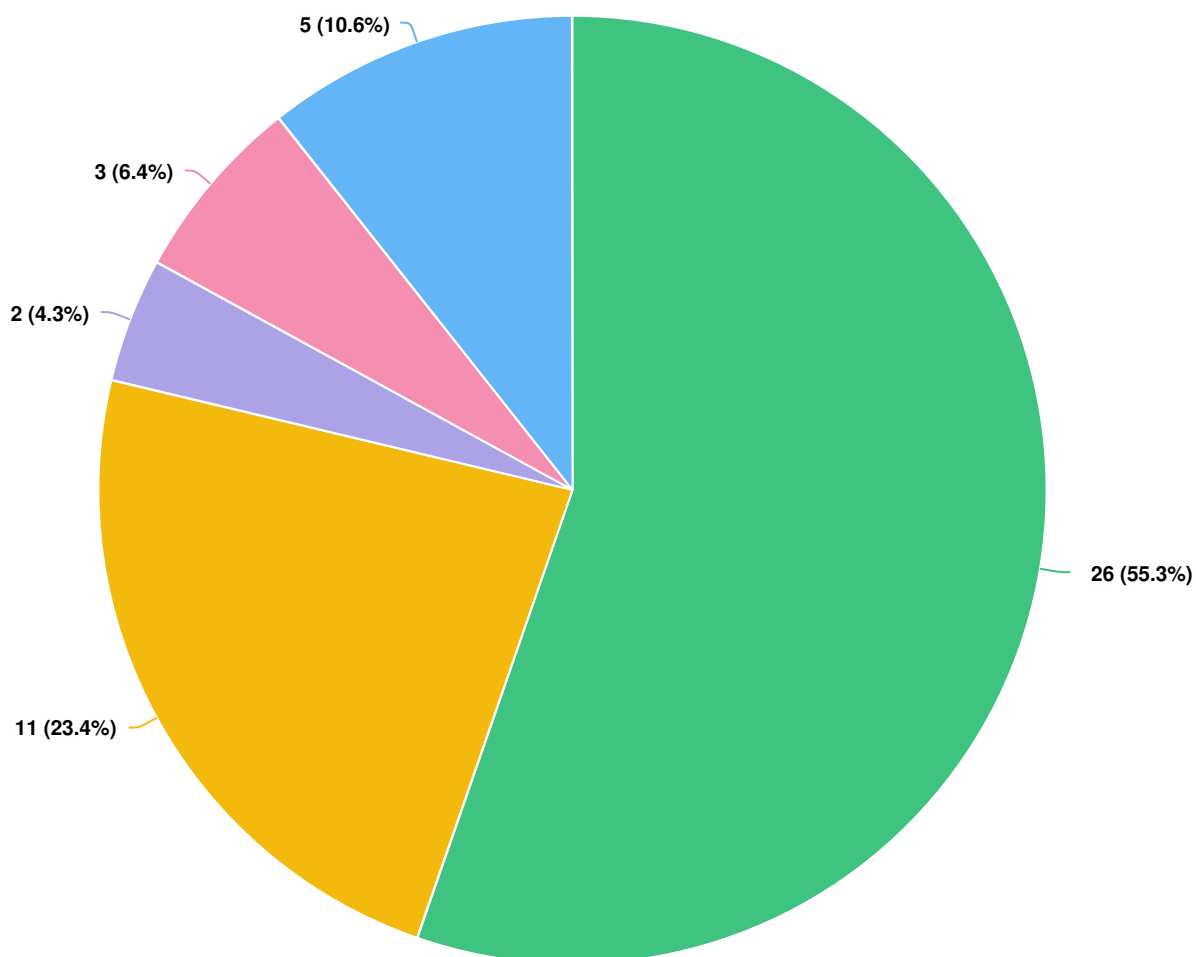


**Question options**

- Positive
- Negative
- None (no effect)
- Don't know

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q2** Do you think that the Brick Lane Cumulative Impact Policy should be?



**Question options**

- Retained and expanded as per the proposal detailed in the report
- Retained in its current form
- Retained and expanded further than detailed in the report
- Retained but reduced
- Removed

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q4 | If you think that the Brick Lane Cumulative Impact area/zone should be expanded, please detail the extent of the expansion**

Anonymous

4/22/2024 09:46 AM

no bars serving after 11 p.m. - very stringent noise restrictions -  
garbage must be picked up during normal hours and not left on the  
streets - a consistent police Presence

Anonymous

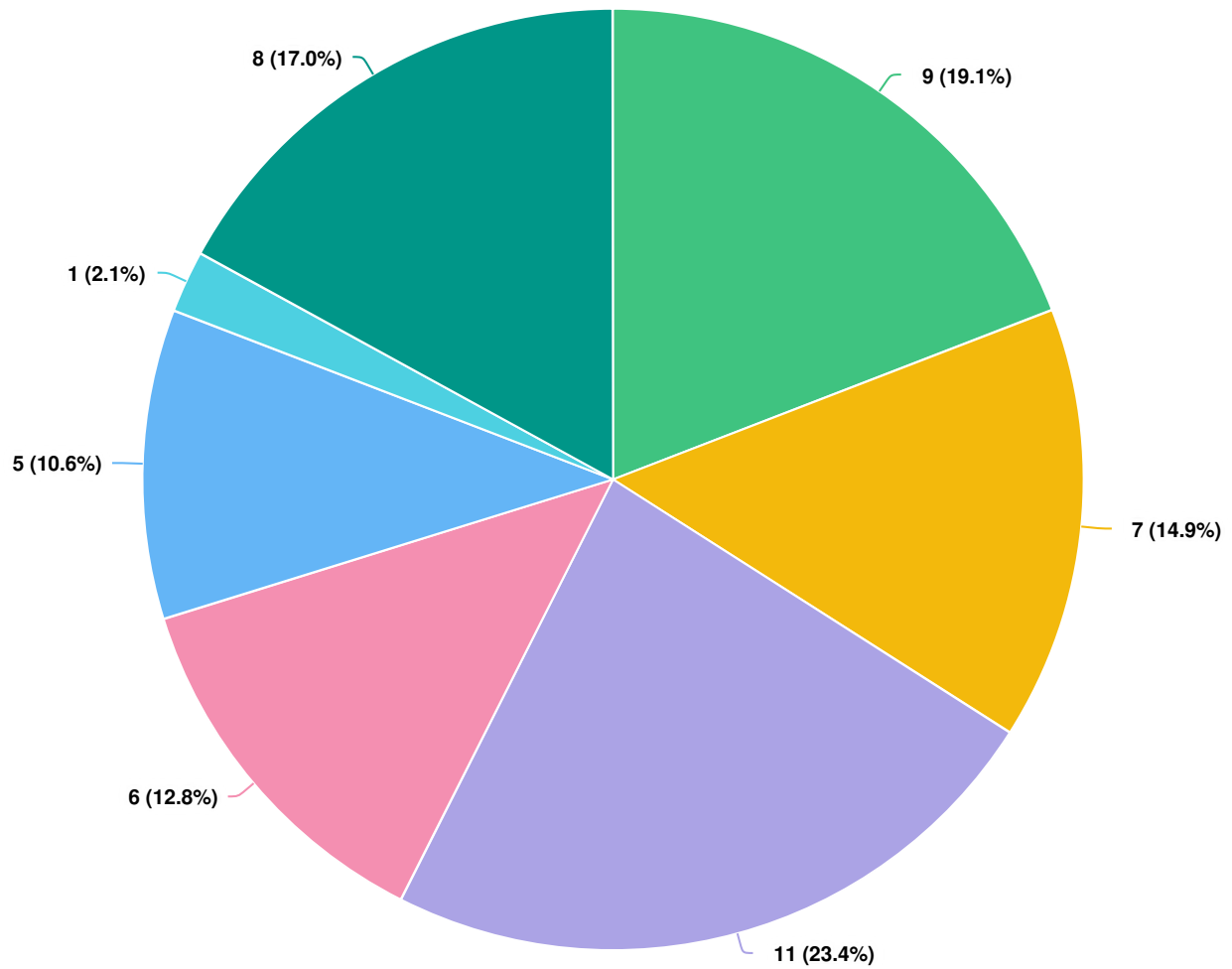
4/23/2024 10:04 PM

This should included new road and whitechapel road

**Optional question** (2 response(s), 45 skipped)

**Question type:** Essay Question

**Q5** How often do you visit licensed premises in Brick Lane Cumulative Impact area?

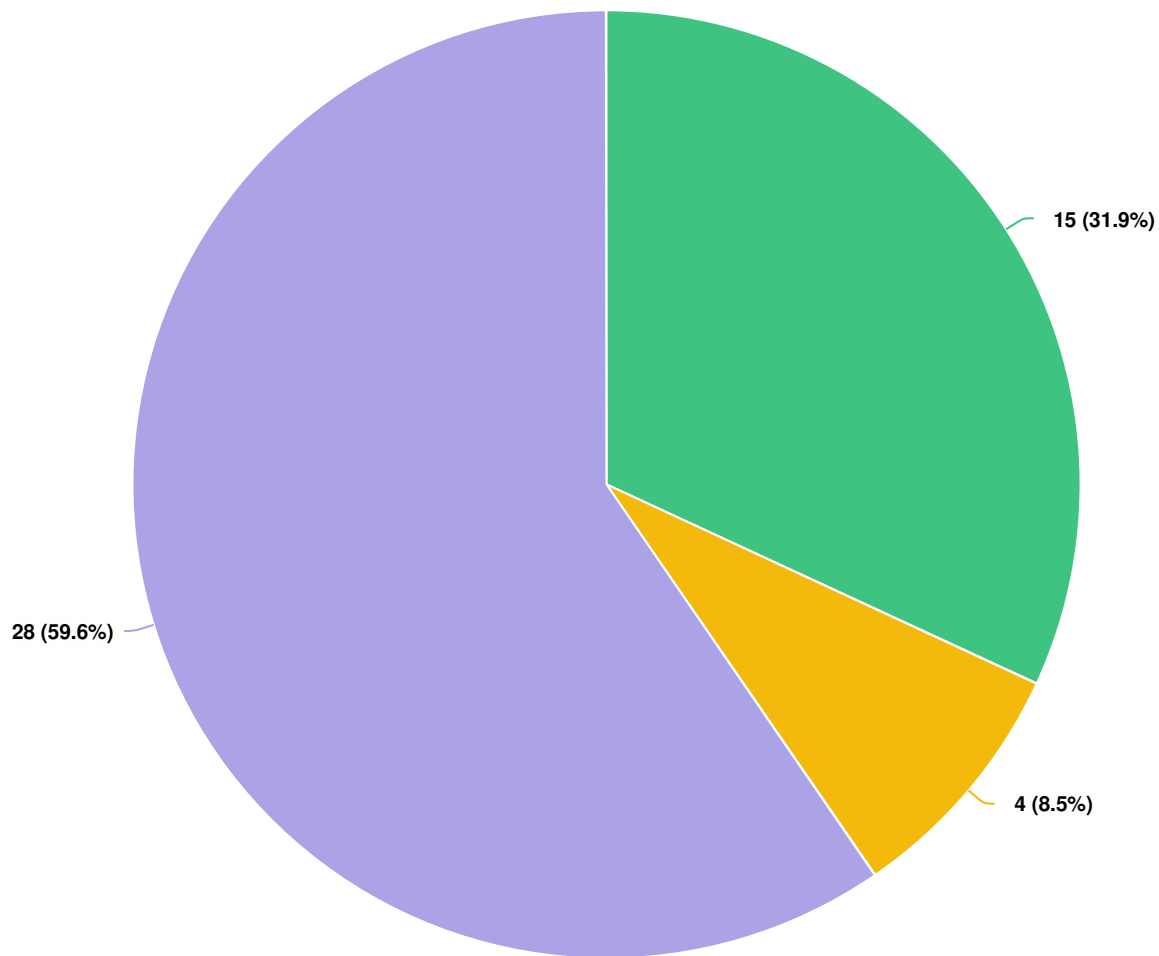


**Question options**

- At least once a week
- At least once every 2 weeks
- At least once a month
- Less than once a month
- Less than every 6 months
- Less than once a year
- Hardly ever

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q6** Which of the following best describes you in reference the the Brick Lane Cumulative Impact Area?

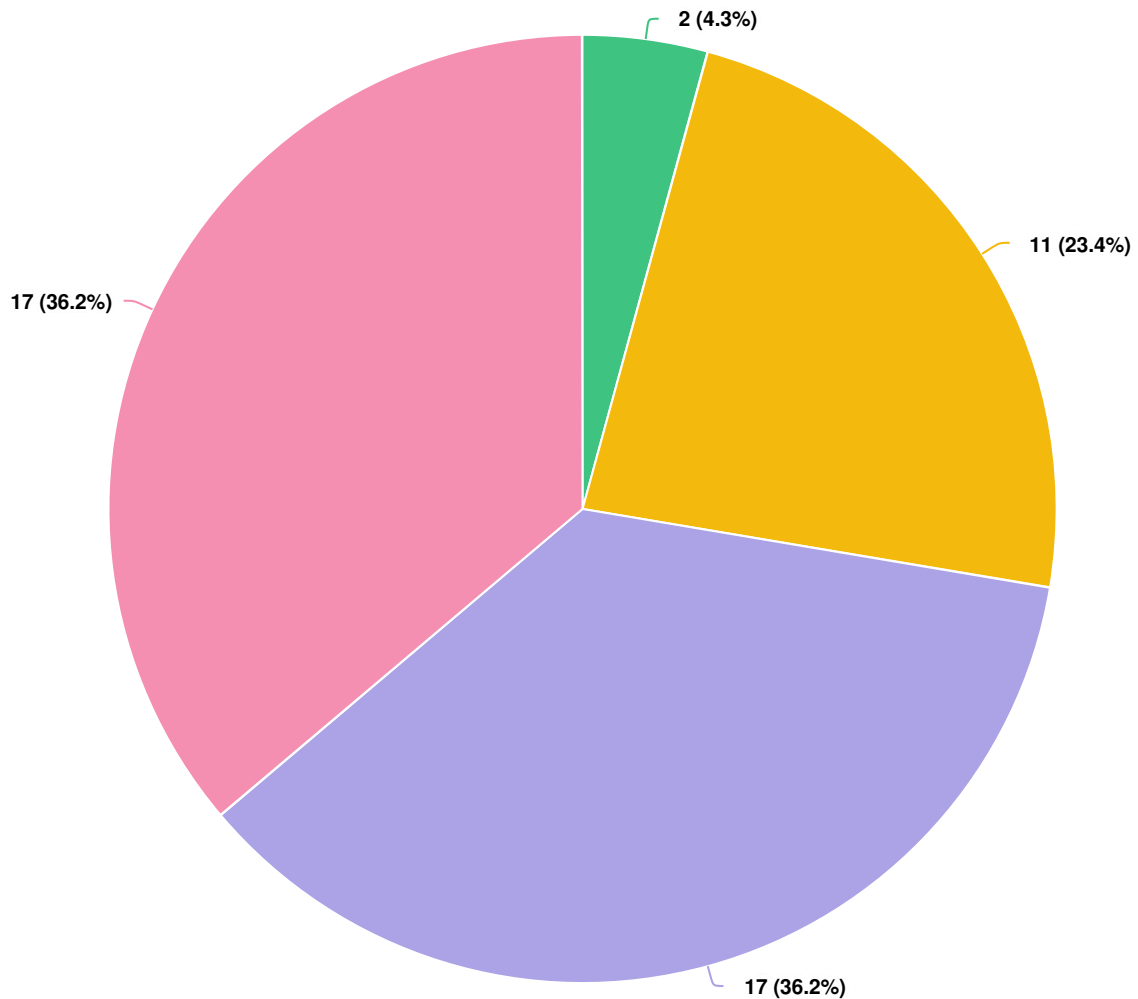


**Question options**

- Customer/visitor
- Worker
- Local Resident

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q7 | Have you experienced crime and disorder or noise nuisance that could be reasonably linked to premises licensed to sell alcohol within the Brick Lane Cumulative area?**

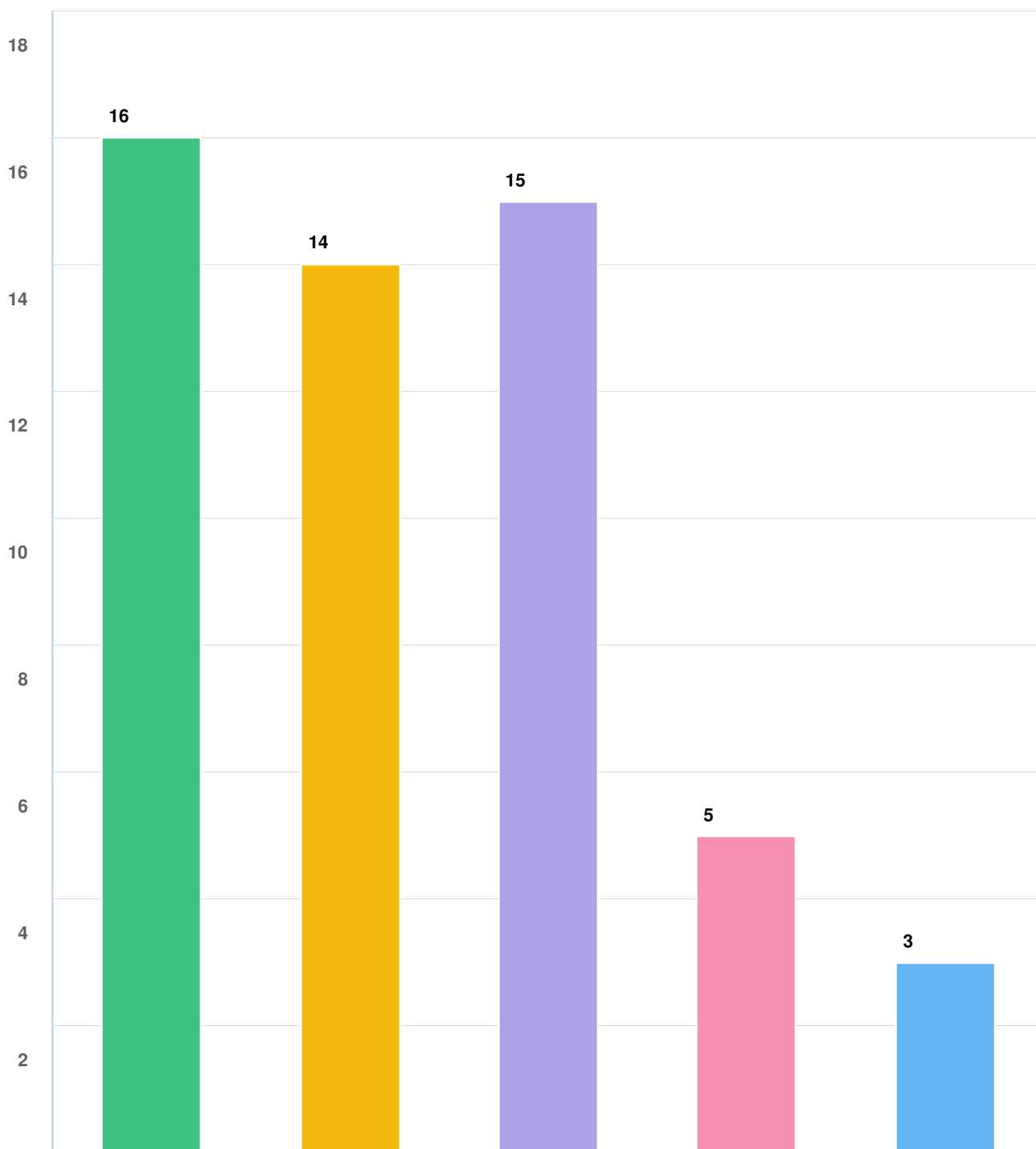


**Question options**

- Yes - Crime and disorder only
- Yes - Noise nuisance only
- Yes - Crime and disorder and noise nuisance
- Not experienced any crime and disorder or noise nuisance

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q8** What type of premises in the Brick Lane Cumulative Impact Area was the crime and disorder linked to? Please select all appropriate:

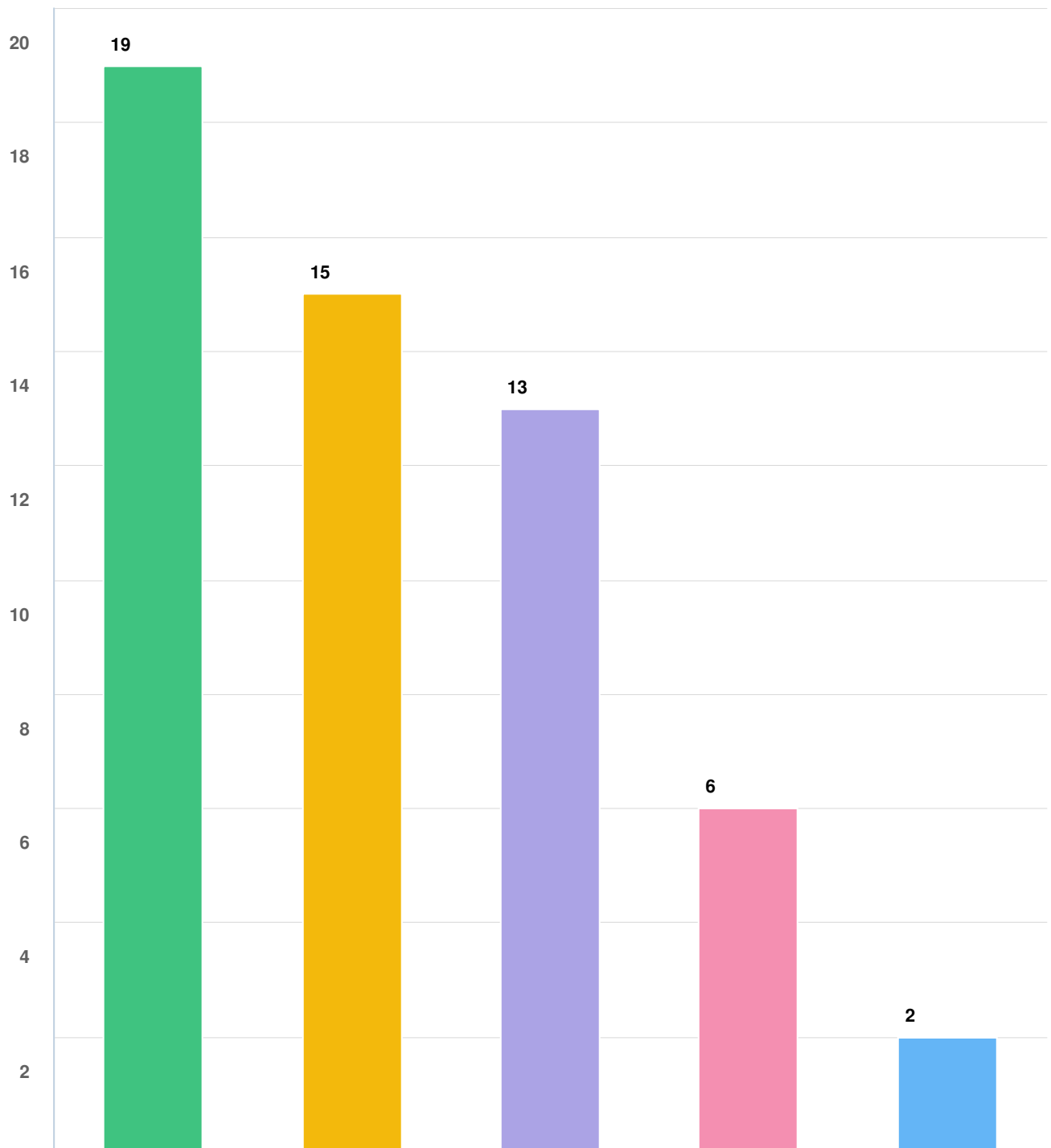


**Question options**

- Pub, Bar etc. - Alcohol to be drunk on the premises
- Off Licence - Alcohol to be drunk away from the premises
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Away
- Don't know
- Other (please specify)

Optional question (29 response(s), 18 skipped)  
Question type: Checkbox Question

**Q9** What type of premises in the Brick Lane Cumulative Impact Area was the noise nuisance linked to? Please select all appropriate:



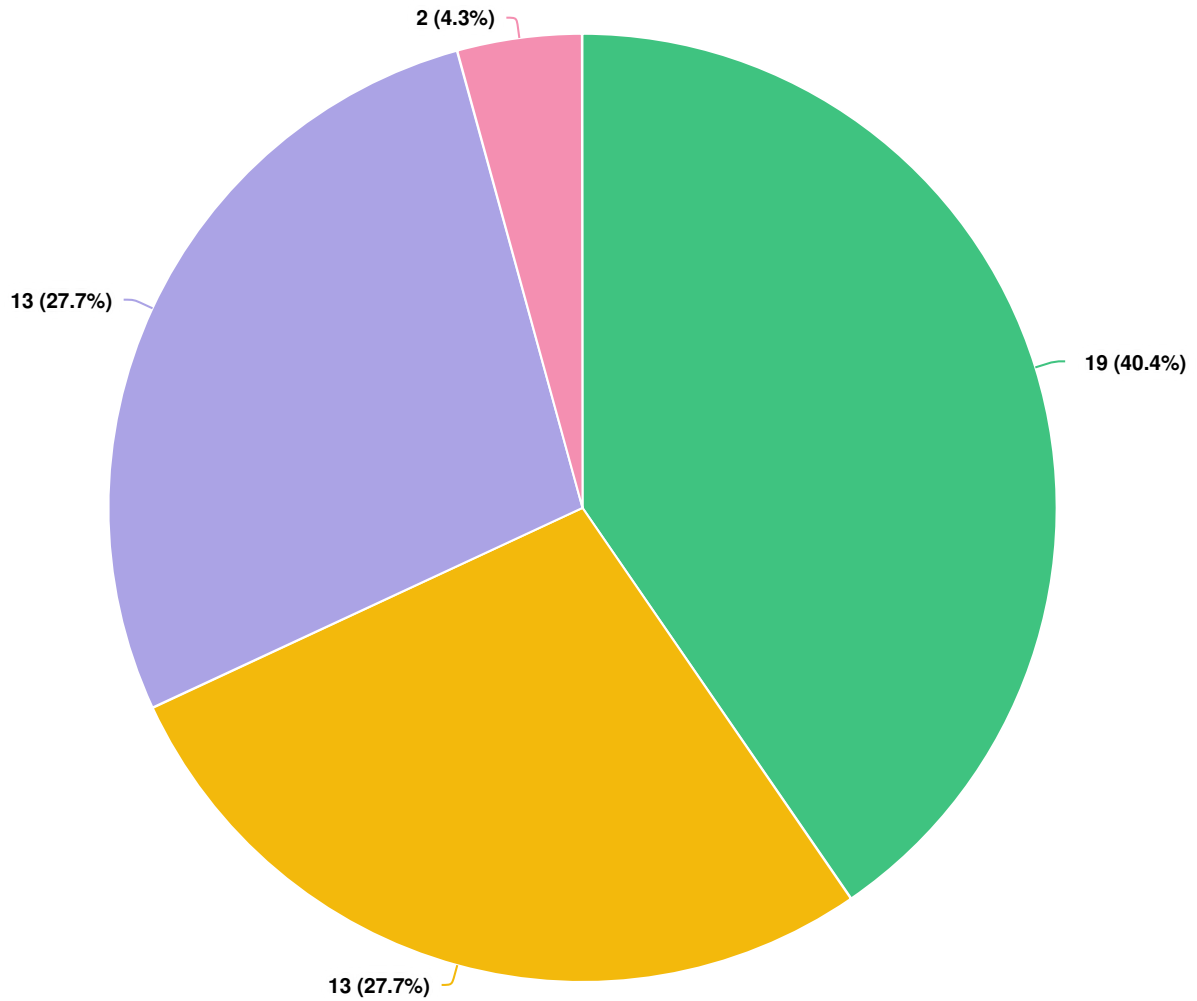
**Question options**

- Pub, Bar etc. - Alcohol to be drunk on the premises
- Off Licence - Alcohol to be drunk away from the premises
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Away
- Don't know
- Other (please specify)

Optional question (30 response(s), 17 skipped)  
Question type: Checkbox Question



**Q10 | Do you think that the Bethnal Green Cumulative Impact Policy should be?**



**Question options**

- Removed, as per the proposal detailed in the report
- Retained in its current form
- Retained and expanded
- Retained but reduced

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q11** | If you think that the Bethnal Green Cumulative Impact zone/area should be retained and reduced, please detail reasons for retaining and reducing the zone, and the extent of the reduction.

Anonymous

Too much late night noise and people urinating in public

4/20/2024 04:21 PM

**Optional question** (1 response(s), 46 skipped)

**Question type:** Essay Question

**Q12** | If you think that the Bethnal Green Cumulative Impact area/zone should be retained and expanded, please detail the reasons for retaining and expanding the zone, and the details of the expansion.

Anonymous

Expanded to mile end

2/09/2024 06:47 PM

Anonymous

Oval space surroundings should be included

2/14/2024 10:32 PM

Anonymous

Bethnal Green has become a hotspot for ASB/crime late at night in particular. The area has a lot of visitors from out of the borough as well due to the night time economy and close border with Hackney. The expansion should act as a parallel action to the flourishing of the night time economy in the area-Due diligence and consideration should be given to any new applicants who would like to obtain new licenses.

2/19/2024 05:15 PM

Anonymous

To 'Ensure & Make safe" all members community

3/13/2024 11:30 PM

Anonymous

There are many residential areas in this area and it is having a detrimental effect on residents as crime and anti social behavior has risen at an alarming rate, during the day as well as night. Any potential new licensing premises will be an extra attraction for crime.

3/14/2024 10:08 PM

Anonymous

extend north to include the areas around CH station & Hackney Road/Mare Street. More development has taken place over the last few years (not just housing but new businesses) which if not monitored carefully could lead to a resurgence of ASB incidents.. No

3/15/2024 11:19 AM

more licenses are required - there is sufficient options already in place. Not a great look in Tower Hamlets (or anywhere for that matter) to see discarded bottles/glasses/food rubbish every morning left strewn around, not to mention the other unmentionable things left by 'people enjoying a night out but who cant use toilet facilities'. I wilfully don't frequent establishments in my area because I'm fearful of ASB - no more licenses please

Anonymous

3/15/2024 06:14 PM

We live in Weavers ward and had many problems in the past with licensed premises on Ezra Street/Columbia Road and surrounding areas as it encouraged street drinking and noise. There is still a major problem with drinking and noise in Ravenscroft Park. We would be against any increase in licensed premises or hours of opening and drinking outside premises. We are in a block of flats where residents range in age from 3 to 84 and we do not want any increase in people drinking in the streets or park.

Anonymous

3/28/2024 09:54 AM

People should be feeling safe while out with they friends or family. By keeping this policy live and expanding it to make even bigger impact on safety issues will do good for our communities.

Anonymous

4/19/2024 08:15 PM

To help reduce crime, disorder and nuisance in the area that can be attributed to the sale of alcohol.

Anonymous

4/20/2024 04:58 PM

Still late night noise and drunken street behaviour and drug dealing

Anonymous

4/21/2024 10:42 PM

The are seems to be becoming a destination area for large groups of young drinkers, especially from Thursday night Amd through the weekend.

Anonymous

4/23/2024 10:04 PM

Too many small business linked to rubbish everywhere -& drug usage

**Optional question** (12 response(s), 35 skipped)

**Question type:** Essay Question

**Q13** | If you think that the Bethnal Green Cumulative Impact area/zone should be retained in its current form, please details the reasons for retaining it.

Anonymous

3/13/2024 02:58 PM

Allot of people drunk in the night, making noise and fighting it's hard to sleep sometimes and it's quite scary at times as fights become quite violent due to people being drunk

Anonymous

3/14/2024 05:41 PM

Because it gives the Licensing Authority greater control over the maintenance of regulations

Anonymous

3/14/2024 10:59 PM

it is necessary to provide as much protection as possible to residents and visitors

Anonymous

3/15/2024 12:57 PM

It has made a difference to local residents, even if not perfect.

Anonymous

3/25/2024 07:41 AM

Because it gives a guidance for people to follow people need rules to follow and law.

Anonymous

4/20/2024 07:14 PM

It maintains control, removal could lead to increase in disruptive behaviour

Anonymous

4/22/2024 11:08 AM

Prevents ASB

Anonymous

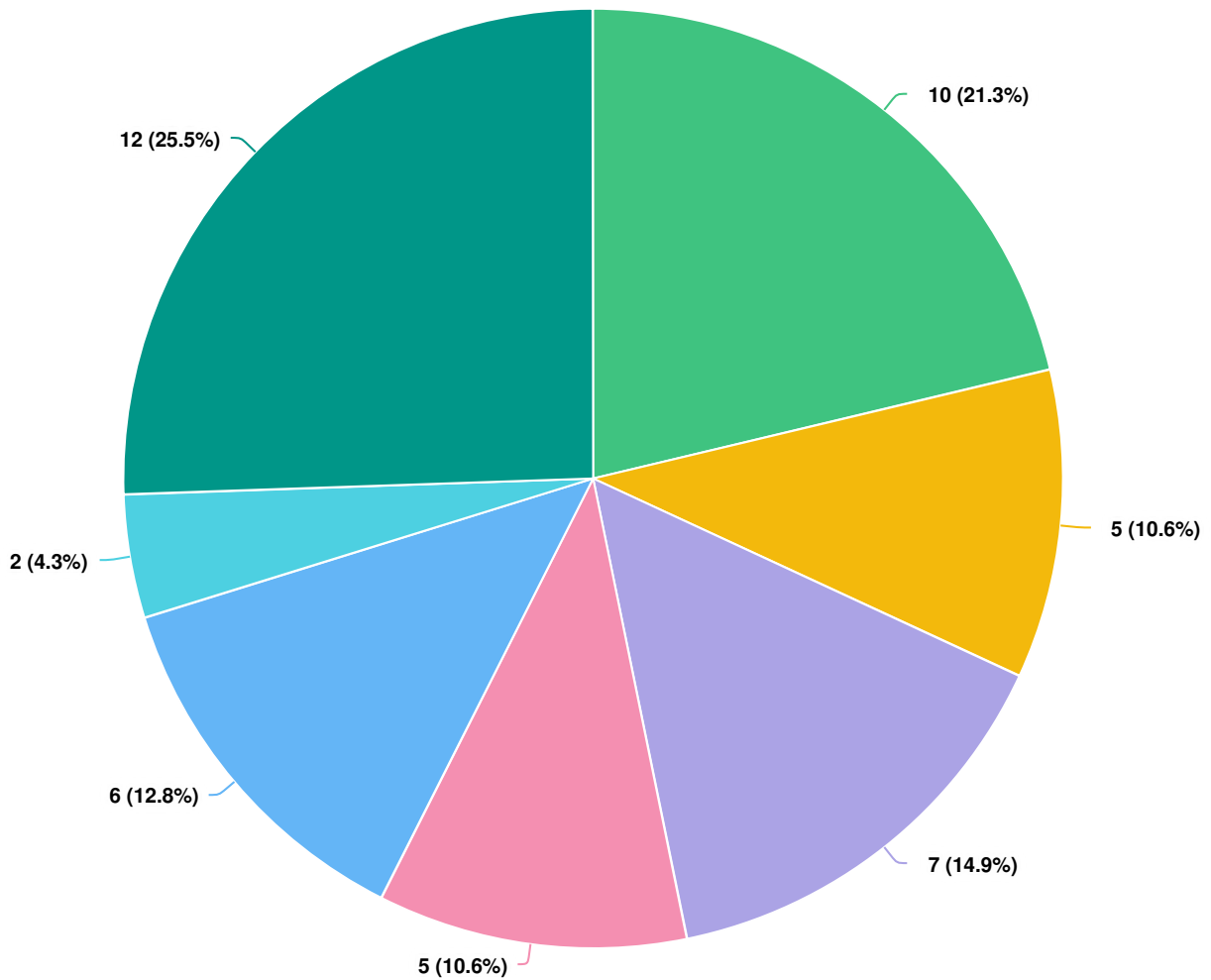
4/22/2024 07:41 PM

While precise data may not support maintaining it in its current form, I would propose that it is exactly this policy which keeps this otherwise vulnerable area in check.

**Optional question** (8 response(s), 39 skipped)

**Question type:** Essay Question

**Q14 | How often do you visit licensed premises in Bethnal Green Cumulative Impact area?**

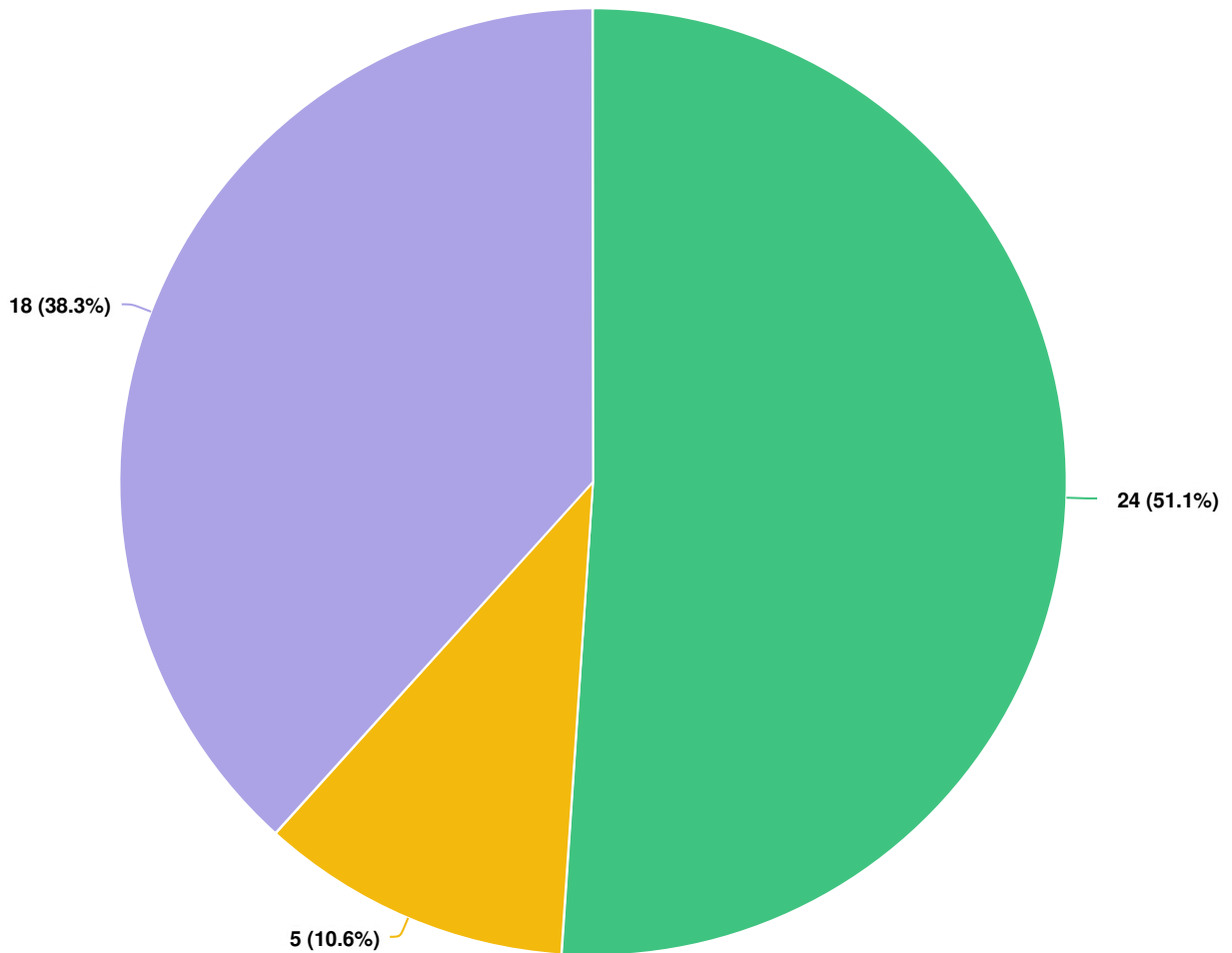


**Question options**

- At least once a week
- At least once every 2 weeks
- At least once a month
- Less than once a month
- Less than every 6 months
- Less than once a year
- Hardly ever

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q15** Which of the following best describes you in reference the the Bethnal Green Cumulative Impact Area?

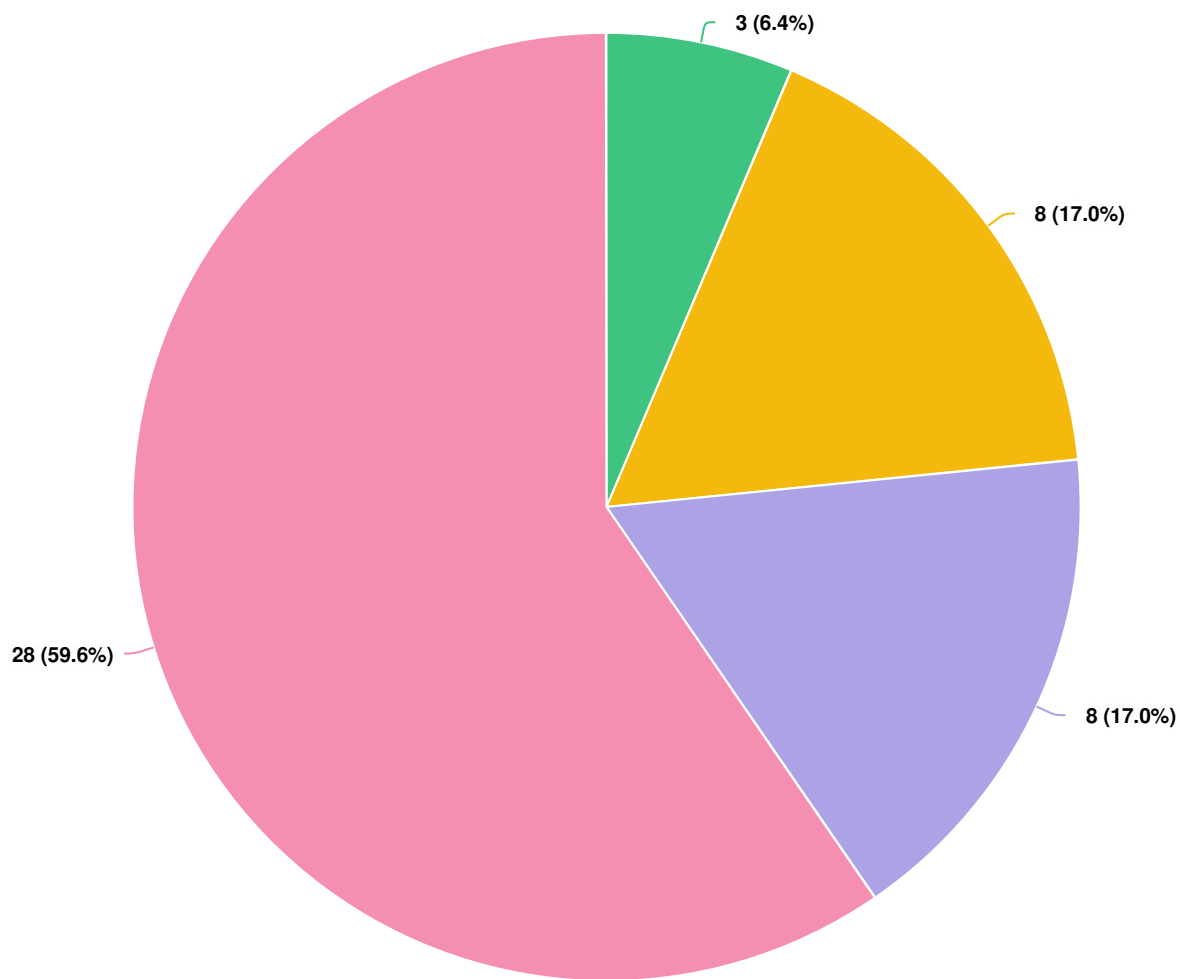


**Question options**

- Customer/visitor
- Worker
- Local Resident

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q16** | Have you experienced crime and disorder or noise nuisance that could be reasonably linked to premises licensed to sell alcohol within the Bethnal Green Cumulative area?

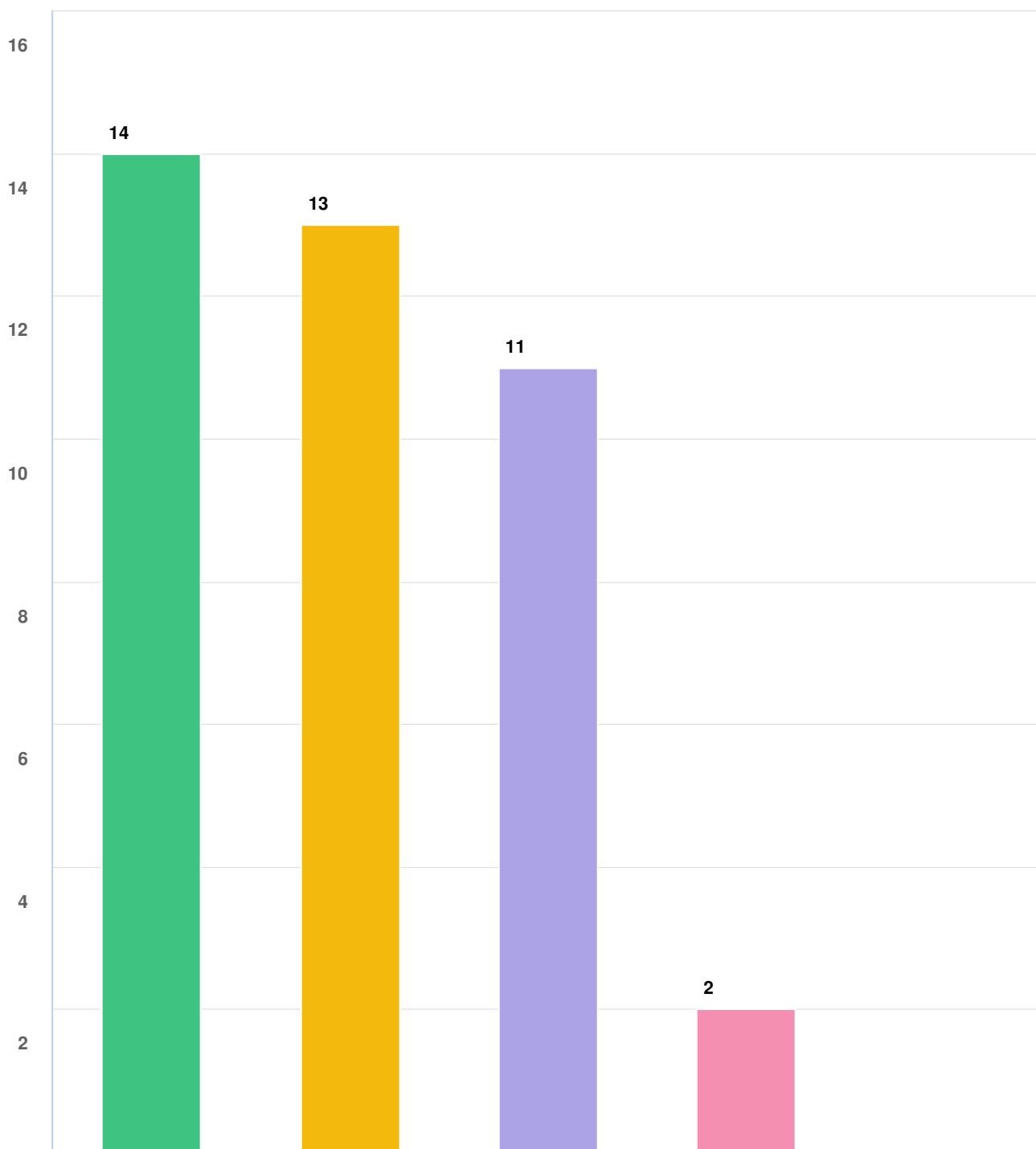


**Question options**

- Yes - Crime and disorder only
- Yes - Noise nuisance only
- Yes - Crime and disorder and noise nuisance
- Not experienced any crime and disorder or noise nuisance

Mandatory Question (47 response(s))  
Question type: Dropdown Question

**Q17** What type of premises in Bethnal Green Cumulative Impact area was this was the crime and disorder linked to? Please select all appropriate:



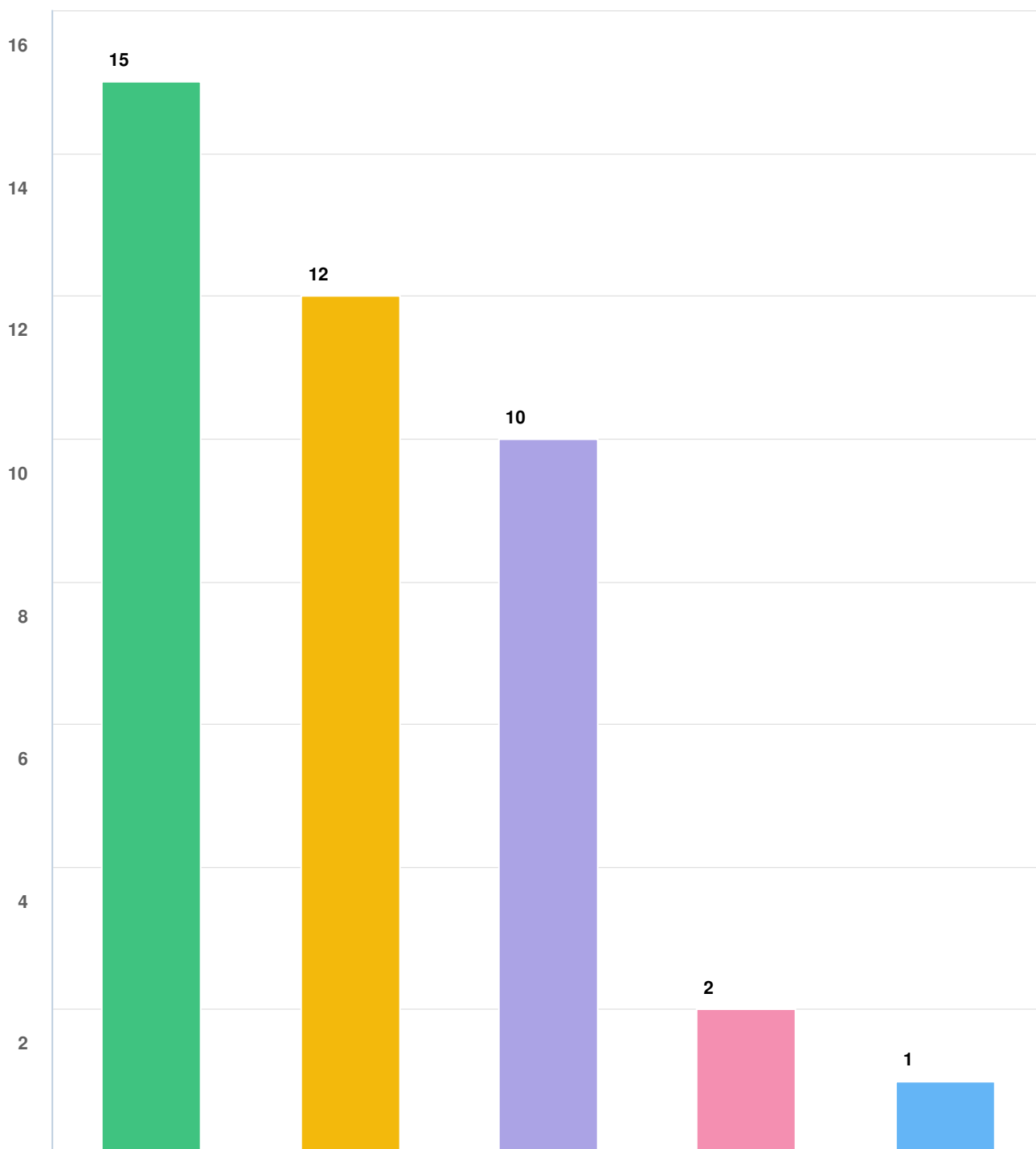
**Question options**

- Pub, Bar etc. - Alcohol to be drunk on the premises
- Off Licence - Alcohol to be drunk away from the premises
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Away
- Don't know
- Other (please specify)

Optional question (19 response(s), 28 skipped)  
Question type: Checkbox Question



**Q18 | What type of premises in the Bethnal Green Cumulative Impact Area was the noise nuisance linked to? Please select all appropriate:**



**Question options**

- Pub, Bar etc. - Alcohol to be drunk on the premises
- Off Licence - Alcohol to be drunk away from the premises
- Late Night (after 11pm) Hot Food Café/Restaurant or Take Away
- Don't know
- Other (please specify)

Optional question (19 response(s), 28 skipped)  
Question type: Checkbox Question

**Q19 | If wish to make further comments please detail them below or alternatively email the Licensing Team via [Licensing@towerhamlets.gov.uk](mailto:Licensing@towerhamlets.gov.uk).**

Anonymous

2/09/2024 06:06 PM

Licensing premises are far less than before.therefore the impact had been reduced

Anonymous

2/10/2024 12:48 AM

No

Anonymous

2/14/2024 10:32 PM

Please don't remove the CI for Bethnal Green and the oval space areas must be included. So much crime here

Anonymous

2/19/2024 02:48 PM

Cumulative impact policies are a blunt tool. They discourage applicants and new concepts from coming to the area and should be avoided in favour of making good, robust licensing decisions on the merits of particular applications.

Anonymous

3/13/2024 01:51 PM

The area has developed due to the varied and interesting nightlife. To place undue burdens on businesses will ensure that they move to another area (which is what is happening).. london needs a nighttime economy to ensure that it flourishes and provides much needed income and vibrancy which was lacking when this was a run down area. This is the goose that is laying golden eggs and we do not want to kill it. I understand there is noise and antisocial behaviour associated with the nighttime economy but this needs to be managed as part of an overall policy of crime reduction. We should not place undue burdens on business as we are entering a/escaping from a recession and escaped from the tail end of Covid. There is some undue nuisance prevalent when there are late night establishments, but this can be managed appropriately rather than having a sledgehammer approach to the issue.

Anonymous

3/14/2024 10:08 PM

It is disappointing to hear that any rules will be relaxed. It seems that residents are not a priority, only commercial opportunities which the residents have to suffer the consequences.

Anonymous

3/15/2024 06:14 PM

It would be good if regular visits could be made by council officials to Ravenscroft Park late at night to appreciate the level of noise emanating from there and spilling onto the streets around.

Anonymous

3/28/2024 09:54 AM

N/A

Anonymous

3/30/2024 11:14 AM

As a resident of the Brick Lane area for 27 years, I have seen a significant reduction in crime, disorder and night-time noise since the introduction of the LBTH Cumulative Impact Policy some years ago.. When I moved here in 1997 I could not sleep in the main bedroom at the front of the house because of loud drunken people in the street but it has changed hugely for the better following the introduction of the CIP and I am now able to sleep in peace and comfort. It is very important for local residents that the CIP be retained and if possible extended. PLEASE keep the policy going.

Anonymous

4/18/2024 10:48 AM

As a local resident in the Spitalfields area the CIA has made a real difference over the past years in reducing the number of issues especially from noise and ASB and given residents the means to ensure licence controls are attached to new licences. Please keep the CIA in place especially as more and more food and beverage places open, which is a good thing but it needs to have controls to ensure local residents aren't affected by noise and ASB

Anonymous

4/18/2024 01:07 PM

As tourism increases during the summer months in the Spitalfields/Brick Lane enclave - noise and ASB increases over weekends, evenings and early morning. I have been a resident of Spitalfields for over 20 years and the CIA contributes to a more controllable situation in these very popular and trendy neighbourhoods. With more large building projects planned in the Goods Yard and Brick Lane the CIA is and will become ever more necessary in refraining from turning these areas into only bar/restaurants venues all with alcohol licences

Anonymous

4/20/2024 07:16 PM

The present CIA is obviously working as there has a very minimum of problems. Keep it as it is

Anonymous

4/22/2024 07:41 PM

The existence and maintenance of the CIA's is a vital componet to balancing the commercial and residential needs of the stated areas. It has been instrumental for resident associations and SPIRE who tirelessly look to strike the right balance with a need for commerce and maintain an enjoyable and safe area to live.

Anonymous

4/23/2024 10:04 PM

We have small businesses littering all over Tower hamlets - they are not being accountable - the rat problem is out of control and the noise pollution is high - with reving cars and huge groups congregating

outside bubble tea houses late at night

**Optional question** (14 response(s), 33 skipped)

**Question type:** Essay Question

## **Appendix Six – CIA – Table of Online Survey Additional Comments**

		<b>Summary of Comment</b>
1.	Anonymous	Licensing premises reduced and thus the impact has reduced.
2.	Anonymous	No.
3.	Anonymous	Bethnal Green CIA must be kept and expanded to include Oval Space.
4.	Anonymous	CIA are a blunt tool and discourage applicants and new concepts from coming to the area. CIA should be avoided in favour of robust licensing decisions based merits of particular applications.
5.	Anonymous	London needs a nighttime economy, which provides income and vibrancy.  CIA place undue burden, any noise/ASB associated with nighttime economy can be managed by via appropriate policies rather than CIAs. Particularly in view of the recession following the Covid Pandemic.
6.	Anonymous	CIAs should be kept resident should be priority rather than commercial opportunities which causes consequences for residents.
7.	Anonymous	Regular visits should be made to Ravenscroft Park during late at night due to noise issues, which emanating onto the streets around.
8.	Anonymous	N/A
9.	Anonymous	Keep CIA in Brick Lane. It has a positive effect on the peaceful enjoyment of residents' homes. It is very important for residents that the CAI be retained and if possible extended.
10.	Anonymous	CIA around Spitalfields has made a real difference over the past years in reducing noise and ASB. It gives residents the means to ensure licence controls are attached to new licences.  Concern that CIA should stay especially as more and more food and beverage premises open, which is a good thing provided they are controlled to reduce any impact on residents in regard to noise and ASB.
11.	Anonymous	Brick Lane CIA has contributed to more control over licence premises and should be kept. This assist in preventing noise and ASB especially during summer month when tourism increases.
12.	Anonymous	CIA is working because there are very minimum problems. Keep as it is.
13.	Anonymous	Maintenance of CIAs is vital to balancing the commercial and residential needs of the stated areas. It is instrumental in assisting Resident Associations to strike the right balance with a need for commerce and

		maintain an enjoyable and safe area to live.
14.	Anonymous	Some businesses are causing littering all over Tower hamlets who are not being accountable. The rat problem is out of control and the noise pollution is high, and revving cars and huge groups congregating outside bubble tea houses late at night.

## Appendix Seven – CIA Consultation Written Responses and Summary Table

	<b>Responder Description</b>	<b>Supports the Retention and Expansion of Brick Lane CIA (Y/N)</b>	<b>Support the Removal of Bethnal Green CIA (Y/N)</b>	<b>Comment</b>	<b>Page No.</b>
1	Responsible Authority (Police)	Yes	Yes	<p>Bethnal Green CIA – agree with recommendations – data shows a decrease in crimes reported and call outs for Police/London Ambulance Service (LAS), which shows the positive effect the CIA's have had.</p> <p>Brick Lane CIA - Brick Lane continues to be a hot spot for crime/ASB, and the data show increasing call outs/crimes to the area where the proposed expansion lies. It therefore is proportionate to incorporate this area into the Brick Lane CIA.</p> <p>It is important that we continue to monitor areas like Hackney Wick and Canary Wharf. If demand on emergency services as well as crime trends continue an upward trajectory then measures like CIA's must be considered.</p>	3
2	Responsible Authority (Public Health)	Yes	Yes	<p>Data shows that there is a high density of licenced premises in the Brick Lane CIA, alongside licenced trade related police call outs/crime. This is not the case in the Bethnal Green CIA. Given that CIAs are implemented where adverse effects of alcohol availability can be demonstrated, it is reasonable to support the recommendation to remove the Bethnal Green CIA and extend the Brick Lane CIA.</p>	4-7

				Public Health supports the increased scrutiny of alcohol license requests that the cumulative impact policy allows, for the following reasons: <ul style="list-style-type: none"> <li>- Alcohol harms</li> <li>- Inequality</li> <li>- Cumulative Impact Zones: an opportunity for greater scrutiny of alcohol licences</li> </ul>	
3	Residents Association - ARESTA (Ezra Street Residents Association)	Yes	Yes	Support keeping CIAs and expanding them where needed.  Area around Columbia Road, Ezra Street and Ravenscroft Park should be considered as an CIA. Expanded licensing in recent years has added to already high problems of public nuisance, crime and disorder. The are opposed to any more licenses being granted.	8
4	Resident	Yes, in keeping the CIA		Area round Ezra Street/Ravenscroft Street has had many problems in the past. I am against any increase of licensed premises or extension of licensed hours in the area. Noise and street drinking is an increasing problem in the summer months.	9

Full responses can be found below numbered as they appear in this table above.



## **1. Responsible Authority (Met. Police – Borough Commander) – Written Response**

Having examined the data contained in the report we agree with the recommendations of Tower Hamlets Council to remove the Bethnal Green Cumulative Impact Area (CIA) and increase the size of the Brick Lane CIA. The data shows a welcome decrease in both crimes reported and reductions in call outs for both Police and LAS in both areas, which we believe shows the positive effect the CIA's have had.

We recognise that the night time economy is dynamic and changes quickly as new venues open up and cultural trends change. Therefore it is important that we continue to monitor areas like Hackney Wick and Canary Wharf where we are seeing new venues open up, increased footfall, and thousands of new residential properties being built. There is also an increasing number calls to Emergency services, and an increase in crimes in these areas, although from a low base. If demand on emergency services as well as crime trends continue an upward trajectory then measures like CIA's must be considered.

The Shoreditch area including Brick Lane continues to be a hot spot for crime and anti-social behaviour, and the data show increasing call outs and crimes to the area around Aldgate East and Whitechapel which is part of the increased Brick Lane CIA. It therefore is proportionate to incorporate this area into the existing Shoreditch / Brick Lane CIA.

The decrease in crimes and ASB linked to the CIA in Bethnal Green is welcome and we agree that it is no longer proportionate to main the CIA in that area, of course we will look at crimes in this area to see if there is any negative reaction to this.

We therefore agree with Tower Hamlets Councils recommendations regarding the Cumulative Impact Assessment review.

## **2. Responsible Authority (Director of Public Health) – Written Response**

The Tower Hamlets Public Health team offers this response to the Cumulative Impact Policy Review 2024 consultation.

Cumulative Impact Zones (CIZ) are a useful tool to control the availability of alcohol in problem areas. However, the public health evidence suggests that this tool is often poorly utilised. Data provided by Tower Hamlets Council as part of this consultation shows that there is a high density of licenced premises in the Brick Lane CIZ, alongside licenced trade related police call outs and crime, this is not the case in the Bethnal Green CIZ. There have only been ten licences granted in the Bethnal Green zone over the past three years, in comparison to 56 in the Brick Lane CIZ. Given that CIZs are implemented where adverse effects of alcohol availability can be demonstrated, it is reasonable to support the Alcohol Licensing Team's recommendation to remove the Bethnal Green CIZ and extend the Brick Lane CIZ.

Aside from the data provided with the consultation, Public Health supports the increased scrutiny of alcohol license requests that the cumulative impact policy allows, for the following reasons:

- Alcohol harms
- Inequality
- Cumulative Impact Zones: an opportunity for greater scrutiny of alcohol licences  
Public Health Tower Hamlets: Consultation Response

### **Alcohol harms**

In England, among people aged 15 to 49 years, alcohol is the leading cause of ill-health, disability, and death<sup>1,2</sup>. All major systems in the human body are affected by alcohol consumption. The effects vary according to several factors, including age, gender, body mass index (BMI), pattern and volume of alcohol consumption, and the length of time someone has been consuming alcohol. The health effects of alcohol can be acute, for example poisoning or injury, and chronic, for example liver cirrhosis, cardiovascular disease or female breast cancer<sup>2</sup>. Alcohol is a major cause of hospital admission - as either a consequence of acute alcohol intoxication or of alcohol misuse over time. In 2021/22 there were 342,795 hospital admissions in England where a diagnosis was attributable to alcohol<sup>3</sup>. Since 2019, alcohol-related mortality in England has been increasing, from 36.5 per 100,000 in 2019 to 39.7 per 100,000 in 2022<sup>4</sup>. Tower Hamlets has higher alcohol related mortality than both London and England, with 48.2 per 100,000 people dying of alcohol-related conditions in 2022<sup>4</sup>. Alcohol misuse across the UK is a significant public health problem with major health and social ramifications and economic consequences estimated at between £21 and £52 billion a year<sup>2</sup>. There is some evidence that increases in alcohol availability locally is associated with increases not only in consumption, but also in alcohol-related harm<sup>5</sup>. It is therefore in the interest of individuals and of society that careful consideration is given to alcohol licence requested in areas that already have a proliferation of licenced premises.

Binge drinking carries many risks, including short-term harms like accidents or injuries which increase between two to five times as a result of drinking between 5 and 7 units of alcohol in a single drinking session, compared with not drinking any alcohol at all<sup>6</sup>. There is evidence that binge drinking increases your risk of long-term health problems including becoming dependent on alcohol, alcohol-related cancer and heart disease<sup>7</sup>. Binge drinking can also affect memory and, in the longer term, can lead to serious mental health problems<sup>8</sup>, with some evidence showing it is linked to suicide<sup>9</sup>.

A recent drug and alcohol needs assessment by the Centre for Public Innovation found that there has been an increase in the percentage of Tower Hamlets adults binge drinking (drinking heavily over a short space of time) on their heaviest drinking day from 11.9% in 2011-14 to 19.5% in 2015-18, higher than London and national rates. Tower Hamlets residents who reported drinking more than the current Chief Medical Officer guidelines (14 or more 3 units/week) increased to 22% in 2015-18, whereas trends in drinking patterns in London and England have decreased<sup>10</sup>. Although data is not available post-2018, given the evidence that binge drinking comes with increased health risk, it is reasonable to more carefully scrutinise licence applications in areas where there is a saturation of alcohol serving premises, which the Cumulative Impact Policy allows Tower Hamlets Council to do.

### Inequality

The impact of harmful drinking and alcohol dependence is much greater for those in the lowest income bracket and those experiencing the highest levels of deprivation<sup>11</sup>.<sup>12</sup> Income is also associated with health, people in the bottom 40% of the income distribution are almost twice as likely to report poor health than those in the top 20%. This is particularly the case for poverty, and even more so for persistent poverty, both of which are associated with worse health outcomes<sup>13</sup>. This is particularly relevant for Tower Hamlets: in 2021/22, after housing costs, 47.5% of children in Tower Hamlets were living in poverty, equivalent to 14 children in a class of 30, the highest level of child poverty in the UK<sup>14</sup>. Furthermore, 44% of older people in Tower Hamlets live in low-income households, also the highest proportion in England<sup>15</sup>. The London Borough of Tower Hamlets has a duty of care to its residents and so must ensure the alcohol environment is as safe as possible, particularly given the levels of poverty and therefore existing health inequity.

### Cumulative Impact Zones: an opportunity for greater scrutiny of alcohol licences

The night time economy (NTE) is a term that encompasses many different activities, for example, theatre, pubs, restaurants and clubs. NTEs are an important part of our towns and cities and are estimated to bring in over £60 billion to the UK economy every year<sup>16</sup>. In addition to the health harms associated with alcohol consumption, alcohol contributes to broader societal harms including crime, violence, anti-social behaviour and disorder<sup>17</sup>, many of which occur within the context of the NTE. As licensing authorities, councils play an important role in regulating the NTE and good alcohol licensing practice is an important part of how we can address alcohol misuse<sup>18</sup>.

As part of the 2003 Licensing Act<sup>19</sup>, the government introduced a cumulative impact assessment (CIA) as a tool for licensing authorities to limit the growth of licensed premises (both on and off-licences) in a problem area. Cumulative Impact Policies strengthen the powers of local authorities to reject licence applications for retail alcohol sales in cumulative impact zones (CIZs), where adverse effects of alcohol availability can be demonstrated. This provision provides Public Health with an opportunity to contribute their expertise.

A natural experiment, following the introduction of CIZs in the London Borough of Islington found that there were short-term decreases in rates of alcohol licences granted but these reductions were not sustained<sup>20</sup>. Another study found a similar picture – using 10 years of licensing data from Southwark, changes in the issuing of licenses were examined the introduction of three CIZ, relative to control areas. The study found that there was no evidence that the establishment of CIZs resulted in a reduction of the number of successful licence applications, it also found that there was no discernible effect on the relative proportion of licence applications receiving objections in these areas<sup>21</sup>. A 2019 study, however, suggested that CIZs may play a more nuanced role in shaping local alcohol environments – with CIZ implementation associated with greater increases in number of eateries relative to the control area. They concluded that CIZs may be useful as policy levers to shape local alcohol environments to support the licensing goals of specific geographical areas and diversify the NTE<sup>22</sup>. This suggests that if implemented well, CIZ's could be an effective tool ensuring greater scrutiny of licence applications in these areas.

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### **3. ARESTA (Ezra Street Residents Association) – Written Response**

Cumulative Impact Assessment Review 2024

I am writing in response to your consultation on the above. I SUPPORT keeping Cumulative Impact zones and expanding them where needed. The area around Columbia Road, Ezra Street and Ravenscroft Park should be considered as an CIZ.

I am a resident of Columbia Road and Ezra Street to which expanded licensing in recent years has added to already high problems of public nuisance, crime and disorder. My home is now surrounded by seven licensed premises as my immediate neighbours and I would be opposed to any more licenses being granted. We can experience disturbing levels of noise at night and also on Sunday as the market closes in the early evening - a vendor on Ezra Street plays music consistently at very high volume creating a street party atmosphere. This gets exaggerated in the summer when crowds are higher. The crowds of the market and amount of alcohol being sold for consumption on the streets makes a toxic mixture.

Please add this letter to your survey.

#### **4. Resident – Written Response**

Thank you for letting myself and the local neighbourhood know of the review of the Cumulative Impact Assessment survey and for inviting my comments about the consultation report.

As a local person who both lives and works in the neighbourhood I am very much in favour of keeping the Cumulative Impact Policy. As you may know the area round Ezra Street/Ravenscroft Street has had many problems in the past so I am against any extension of licensed premises in the area and any extension of licensing hours for any premises in the area. While social and environmental problems of noise and street drinking (particularly at night) are not so prevalent in the winter months they tend to increase alarmingly during the spring, summer and autumn months. These are the months when drinking and shouting in Ravenscroft Park can continue until the early hours of the morning. As my family and I live opposite Ravenscroft park we have been affected by this noise on frequent occasions and I would like to remind the social and environment authorities at Tower Hamlets about this ongoing problem.

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**Report: Review of the Cumulative Impact Policies (Licensing) in Brick Lane and Bethnal Green**

**Executive Summary**

The Council as the Licensing Authority must consider whether it remains of the opinion as stated in the Cumulative Impact Assessments (CIAs) for Brick Lane and Bethnal Green that these areas are 'saturated with licensed premises.' Licensed premises are those authorised to sell alcohol or the provision of late-night refreshment (sale of hot food after 11pm).

The current cumulative impact policies provide for a rebuttable presumption that the Council will not issue any new licences under the Licensing Act 2003 within the designated areas due to a 'saturation' of licences, due to elevated levels of crime and anti-social behaviour.

The Council currently has two Cumulative Impact Policies or Cumulative Impact Assessments (CIA). The Brick Lane CIA has been in place for nearly nine years and the Bethnal Green CIA has been in place for nearly five years.

A statutory consultation is required to decide on the future of these two CIA, the options are:

- i. Retain both Cumulative Impact Assessments,
- ii. Remove both CIA's,
- iii. Remove Cumulative Impact Assessment for Bethnal Green and retain the one for Brick Lane,
- iv. Remove Cumulative Impact Assessment for Brick Lane and retain the one for Bethnal Green,
- v. Reduce one or both Cumulative Impact Assessment,
- vi. Expand one or both Cumulative Impact Assessment.

Evidence supports the retention of the CIA Brick Lane, with limited evidence to support the Bethnal Green CIA, it is recommended to remove the Bethnal Green CIA. Furthermore, the evidence from the Metropolitan Police's Crime Report and Calls Analysis reports provides evidence for an expansion of the Brick Lane CIA (at the southern end).

The Council is required, before making a decision to carry out a consultation of businesses and other interested parties to seek views if licensed premises could cause exceptional problems of nuisance, disturbance and/or disorder outside or away from those licensed premises as a result of their combined effect.

Currently there are approximately 59 licensed premises in Bethnal Green CIA, and 244 licensed premises in the Brick Lane CIA.

### **Background and Current Position**

The Council agreed for the current CIA's to run for the statutory term of three years from 18<sup>th</sup> November 2021.

#### Brick Lane CIA

Since its introduction in 2014 incidents of crime and antisocial behaviour linked to licensed trade within Brick Lane Cumulative Impact Assessment (CIA) have seen a reduction despite fluctuating figures.

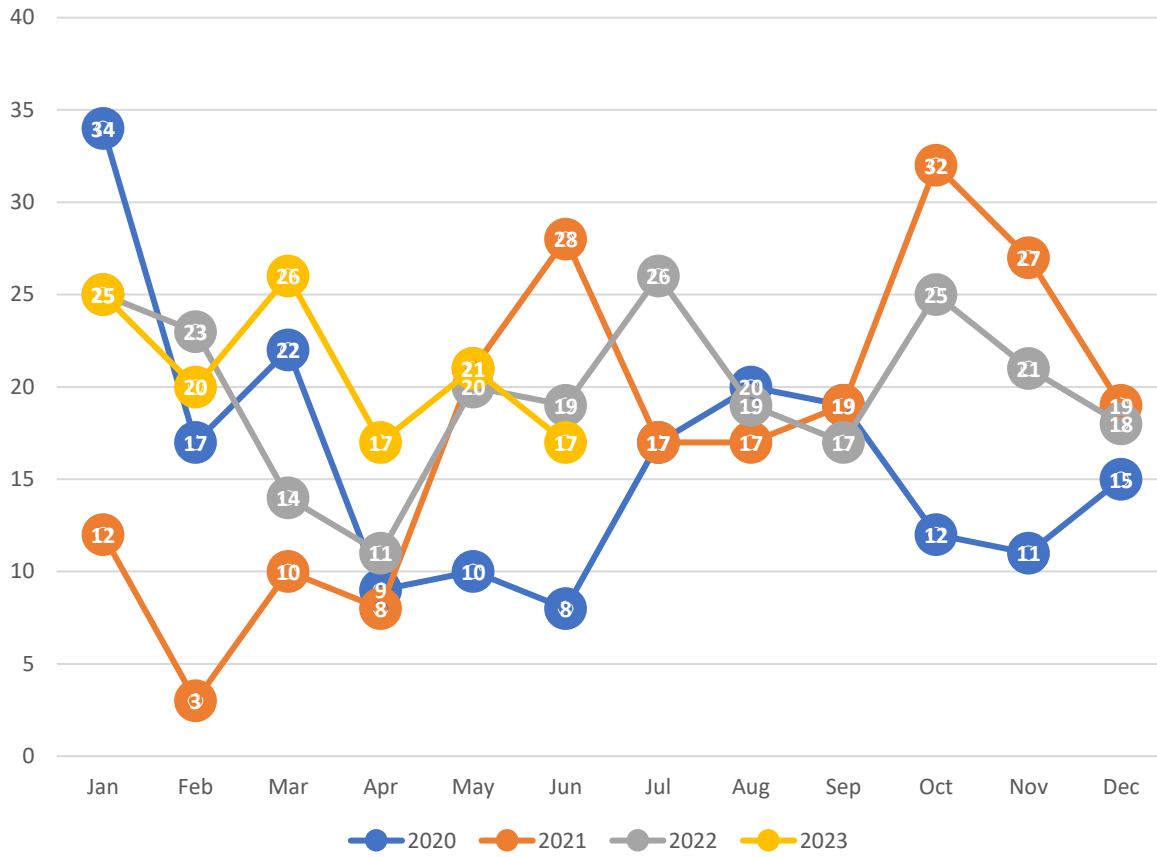
Reports produced by the Metropolitan Police into the Reported Crimes and Police Calls show that incidents of crime and police calls (reporting issues such as antisocial behaviour to the police) linked to the licence trade between 2020 and 2023 (end June) have increased slightly from levels seen in 2017 and 2018.

Total Crimes and Calls to police in 2017 were 357 and in 2018 this was 362.

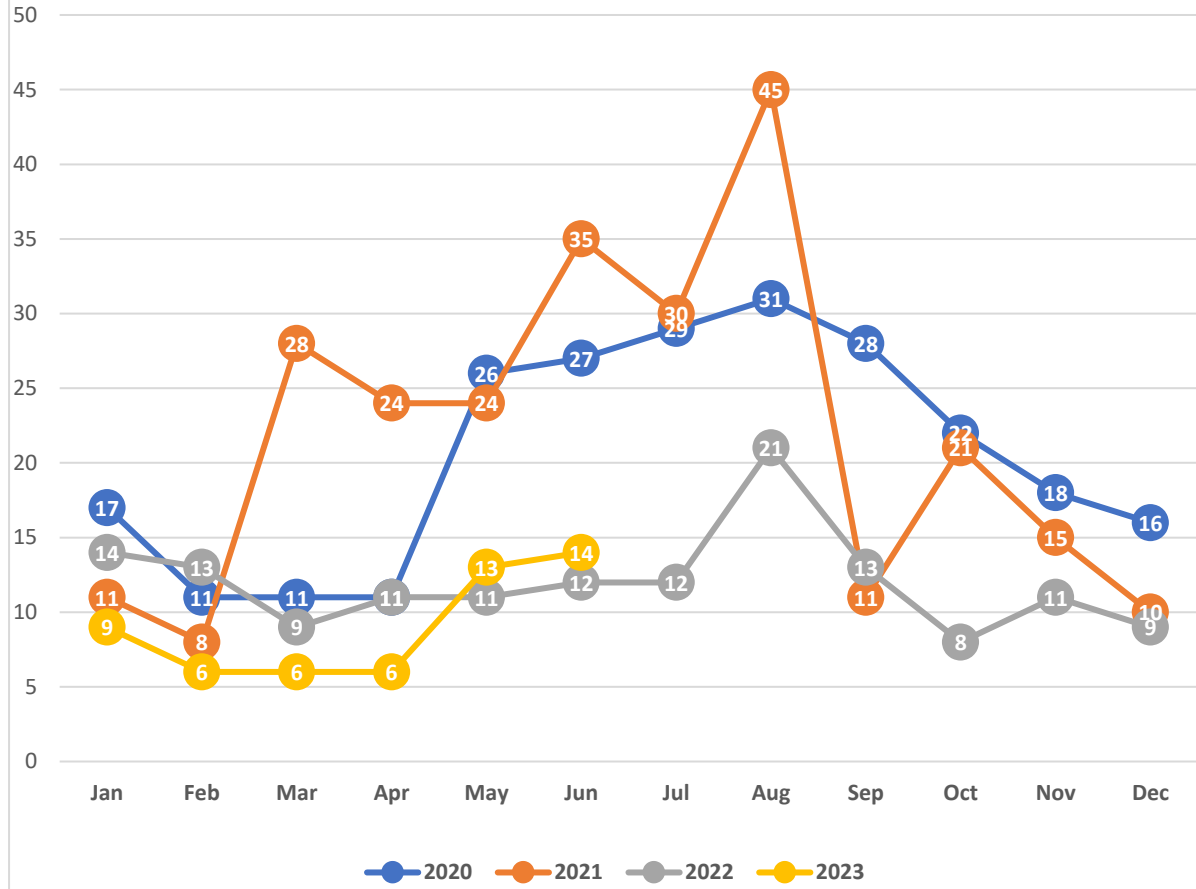
Total crimes and police calls in 2020 to 2023 have reduced except for an increase in 2022 where these peaked at 474.

The charts below demonstrate crimes reported within the CIA have increased slightly, with the calls received by the police showing a decrease.

## Crime Trends CIZ Brick Lane Comparison 2020-2023



## Calls Trends Brick Lane CIZ Comparison 2020 to 2023



Figures 1 to 8 in Appendix 1 contains hotspot maps for 2020, 2021, 2022 and 2023 (end June), which show crimes reported and calls to police linked to the licensed trade for the whole borough. These maps have been taken from the Police Crime Report Analysis and Police Calls Analysis Report. These maps show that the area around the Brick Lane CIA to consistently have greatest crimes and police calls hotspot density with the largest saturation of licensed premises.

Data from Environmental Health and Trading Standards Service between 2020 and 2023 (June) shows complaints received by the Licensing Team have increases since 2020, when the last review of the CIAs was completed. In contrast though Complaints to the Noise Team have decreased over the same period, with a significant decrease is significant in 2023 with only 6 complaints between January and June 2023 linked to the license trade.

Row Labels	2020 (calendar year)	2021 (calendar year)	2022 (calendar year)	2023 (to 28 <sup>th</sup> June)
Brick Lane CIA Noise Complaints	14	30	18	6
Brick Lane CIA Licensing Complaints	73	172	107	50

On a borough wide basis, the Spitalfields & Banglatown and Weavers wards, where the Brick Lane CIA falls within, remain consistently one of the highest wards for licensing complaints. This can be seen in Figures 9 to 12 in appendix 1. This illustrates that these wards have consistently attracted more complaints than other wards in the borough, particularly in regard to Spitalfields and Banglatown, which has the highest complaint consistently over 2020 to 2023.

Noise Complaints: though Spitalfields and Banglatown and Weaver Wards are still having more complaints compared the other wards such as Bow East and Bethnal Green West have received consistently more complaints over the years. This is shown in figures 13 to 16 in appendix 1.

Data from London Ambulance Service (LAS) Call Out Data linked to the Licensed Trade, found in figures 17 to 20 in appendix 1, also shows Spitalfields and Banglatown consistently being one of the Wards to receive higher numbers of call outs. Furthermore, Weavers Ward, though not receiving as many as Spitalfields and Banglatown ward, consistently receives higher call outs than other wards. This is the same for 2020 to 2022, with 2023 appearing to no calls received within Weavers Ward.

The tables below show the number of applications received between 2020 and June 2023 spit by calendar year. This shows that most of the application (38 out of the 63 received) received between 2020 and 2023 (end June) received objections and were decided by the Licensing Sub-Committee.

Count of date	Year			Grand Total
	2020	2021	2022	
<b>Application Granted/Refused etc</b>				
Granted by Officer (no objections or Objections withdrawn)	11	6	8	25
Granted at hearing of Licencing Sub-Committee	8	14	9	31
<b>Total Granted</b>	<b>19</b>	<b>19</b>	<b>17</b>	<b>56</b>
<b>Total Refused (Refused at hearing of Licencing Sub-Committee)</b>	<b>5</b>	<b>1</b>	<b>1</b>	<b>7</b>

It is important to note when considering the above table that the levels of application (new and variations) received in the borough have gone up since 2019.

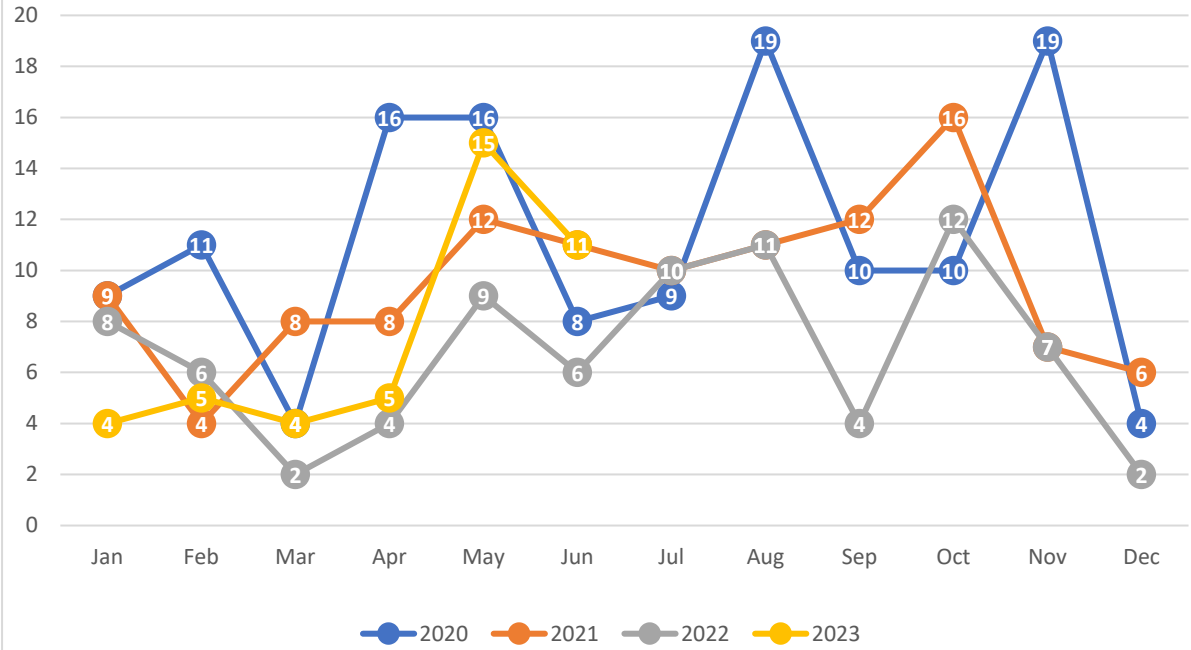
Year	Number Applications received within Tower Hamlets (New and Variations)
2017	141
2018	145
2019	152
2020	160
2021	215
2022	183
2023 (end June)	82

### Bethnal Green CIA

This CIA was introduced in November 2018. Since this time incidents of crimes and antisocial behaviour linked to the licensed trade has gone up significantly from figures seen in 2017, 2018 and 2019, which saw figures of 186, 158 and 180 respectively. Looking at figures from the charts below this significant increase is only in regard to 2020 and 2021 where the total crimes and calls to police equal 267 and 239 respectively.

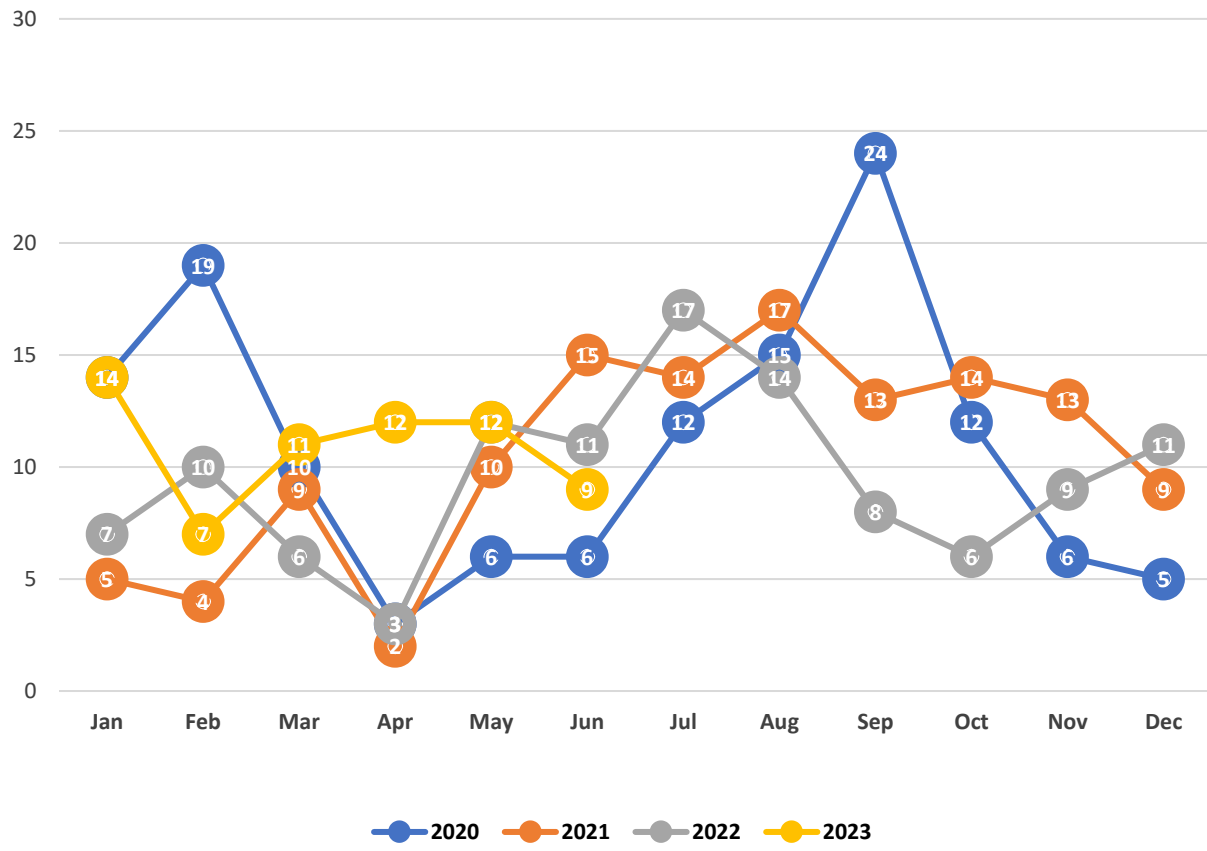
In 2022 the figure drops to 195, which is more in line with those figures seen between 2017 and 2019. There is a slight drop in crimes and calls to police linked to the licensed trade within this CIA.

### Calls Trends Bethanl Green CIZ Comparison 2020 to 2023





### Crime Trends CIZ Bethnal Green Comparison 2020-2023



It is also worth considering the above figures with those found in Brick Lane CIA, which are significantly higher than those found in Bethnal Green CIA. The difference is even more apparent when looking at the hotspot maps in Figures 1 to 8 in Appendix 1.

These show the hotspot maps of the whole borough for 2020, 2021, 2022 and 2023 (end June) crimes reported and calls to police linked to the licensed trade, which have been taken from Police Crime Report Analysis and Police Calls Analysis Report.

The area around Brick Lane is significantly greater in terms of saturation of licensed premises and the hotspots of crimes and calls to police linked to the licence trade.

Bethnal Green in comparison does not appear greater than other areas, because the maps seem to indicate that there are other pockets of the borough with similar hotspot densities and numbers of licensed premises.

The below table shows complaints received by the Environmental Health and Trading Standards Service. These appear to have been in the most part consistent, although both appear to be reducing looking at 2023's figures.

	<b>2020 (Calendar Year)</b>	<b>2021 (Calendar Year)</b>	<b>2022 (Calendar Year)</b>	<b>2023 (end June)</b>
Bethnal Green CIA Noise Complaints	20	33	18	3
Bethnal Green CIA Licensing Complaints	18	21	24	9

On a borough wide basis, the main wards that the Bethnal Green CIZ falls within (Weavers and Bethnal Green West), do receive higher numbers of complaints than other wards. Moreover, in 2023 (figure 16) Bethnal Green West does have the highest number of noise complaints. This can be seen in Figures 9 to 16 in Appendix 1.

Data from London Ambulance Service (LAS) Call Out Data linked to the Licensed Trade generally echoes the data seen in the Licensing and Noise complaints. See figures 17 to 20 in Appendix 1. Again, St Peter's (known as Bethnal Green West on Councils databases) and Weavers Wards receive higher numbers of call outs than other wards, except in 2023 where Weavers ward is absence from charts.

In terms of licence and variation of licence applications granted within the Bethnal Green CIZ area this have been decreasing significantly since 2020, with the majority receiving representations. This can be seen in the tables below.

The tables below show the number of applications received between 2020 and June 2023 spit by calendar year. This shows the total number of licences granted have decreased year on year since 2020. It also shows that of the most (9 out of 13 received) applications received between 2020 and 2023 (end June) received objections and were decided by the Licensing Sub-Committee.

Count of date	Year			Grand Total
	2020	2021	2022	
<b>Application Granted/Refused etc</b>				
Granted at hearing of Licencing Sub-Committee	5	1		6
Granted by Officer (no objections or Objections withdrawn)	1	2	1	4
<b>Total Granted</b>	<b>6</b>	<b>3</b>	<b>1</b>	<b>10</b>
<b>Total Refused (Refused at hearing of Licencing Sub-Committee)</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>3</b>

It is important to note when considering the above table that the levels of application (new and variations) received in the borough have gone up since 2019.

Year	Number Applications received within Tower Hamlets (New and Variations)
2017	141
2018	145
2019	152
2020	160
2021	215
2022	183
2023 (end June)	82

## Options

The Cumulative Impact Assessments have had a positive impact on the areas. This is supported by the number of licences receiving objections thus being determined by Licensing Sub-Committee, which gives a greater degree of community scrutiny.

However, one thing that cannot be shown within the statistics is the greater controls place upon those licences that are granted, either via Licensing Sub-Committee or via Licensing Officers under delegated authority.

These licences have more stringent conditions added which means that the areas have not seen any large-scale late-night bars, pubs or clubs being granted.

Many of the licences granted since the last review in 2021 often prohibit vertical drinking and/or require the sale of alcohol to be axillary to food.

There is sufficient evidence to support retaining the Cumulative Impact Assessment (CIA) around Brick Lane, and to extend the area to the southern edge of the zone.

There is insufficient evidence to retain the Bethnal green CIA.

The consultation proposal is to remove Bethnal Green CIA and extent Brick Lane CIA as per the below:

Figure 1: Current Brick Lane CIA

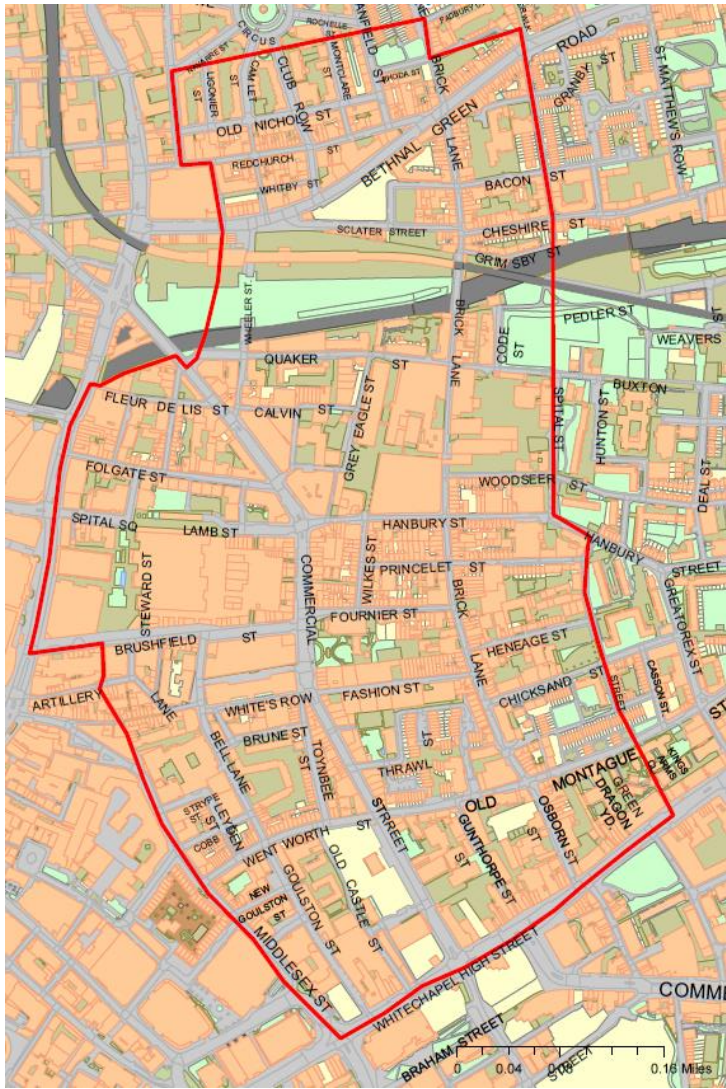
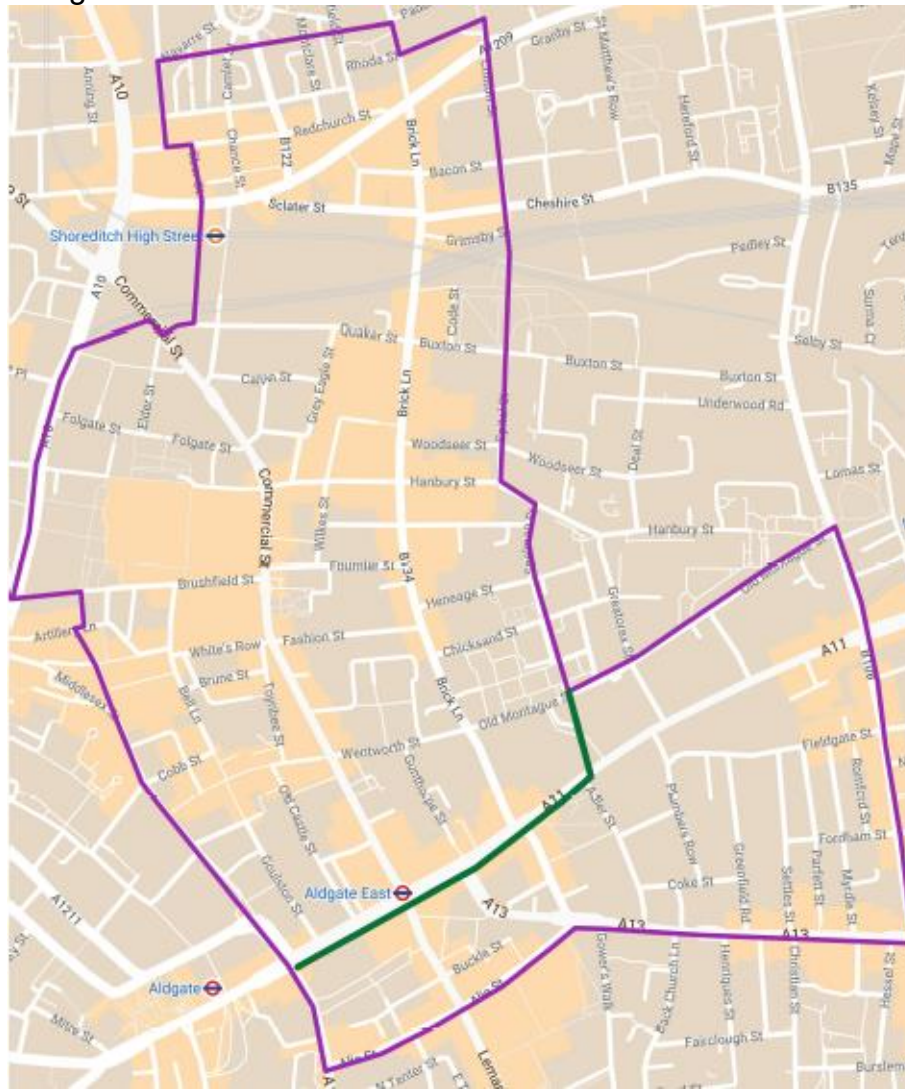


Figure 2: Proposed extension of Brick Lane CIA (the green line represents the edge of the current CIA)



## **Appendices**

Appendix 1 (Hotspot Maps, and Charts)

# Appendix 1

## Reported Crimes Hotspot Maps from Crime Report Analysis produced by the Metropolitan Police

Figure 1: 2020

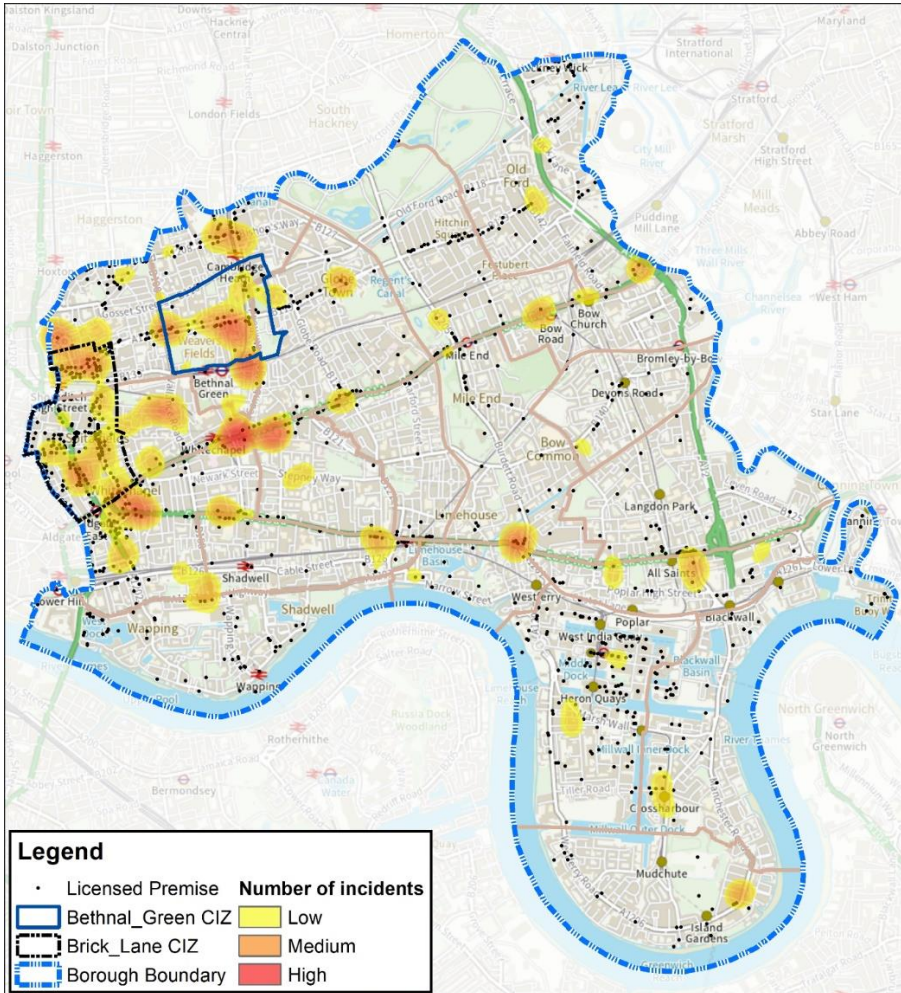


Figure 2: 2021

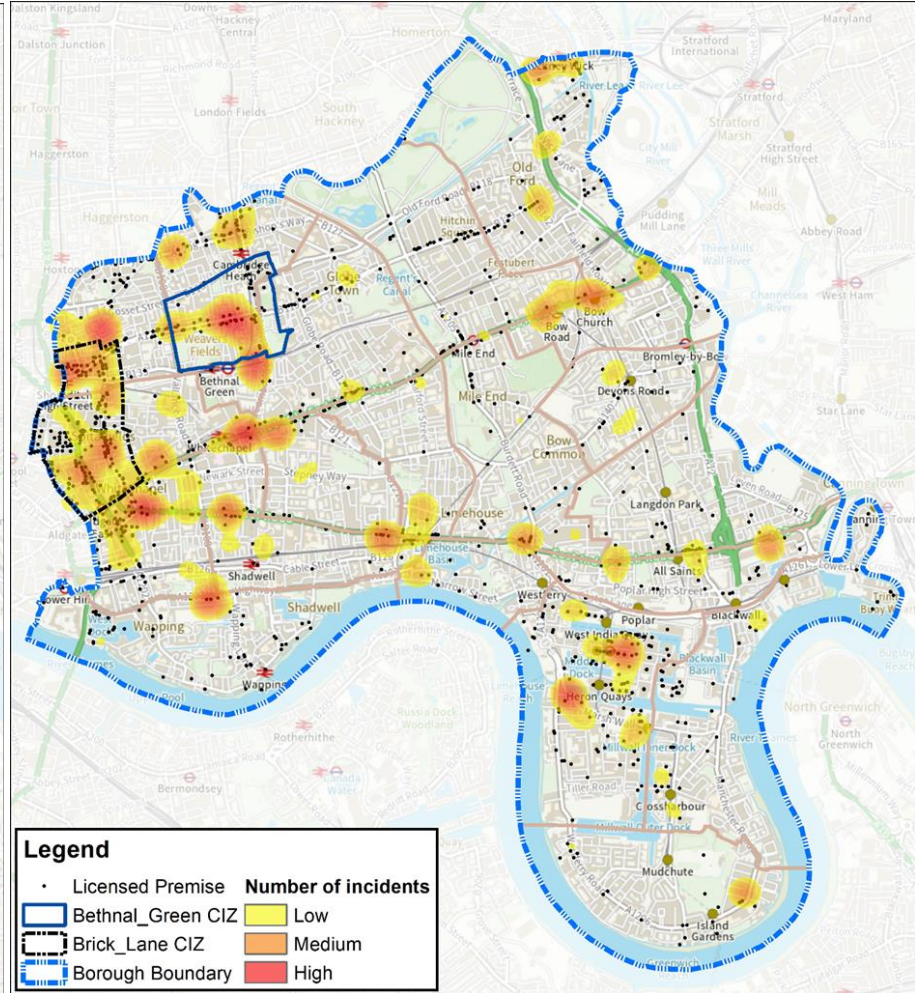


Figure 3: 2022

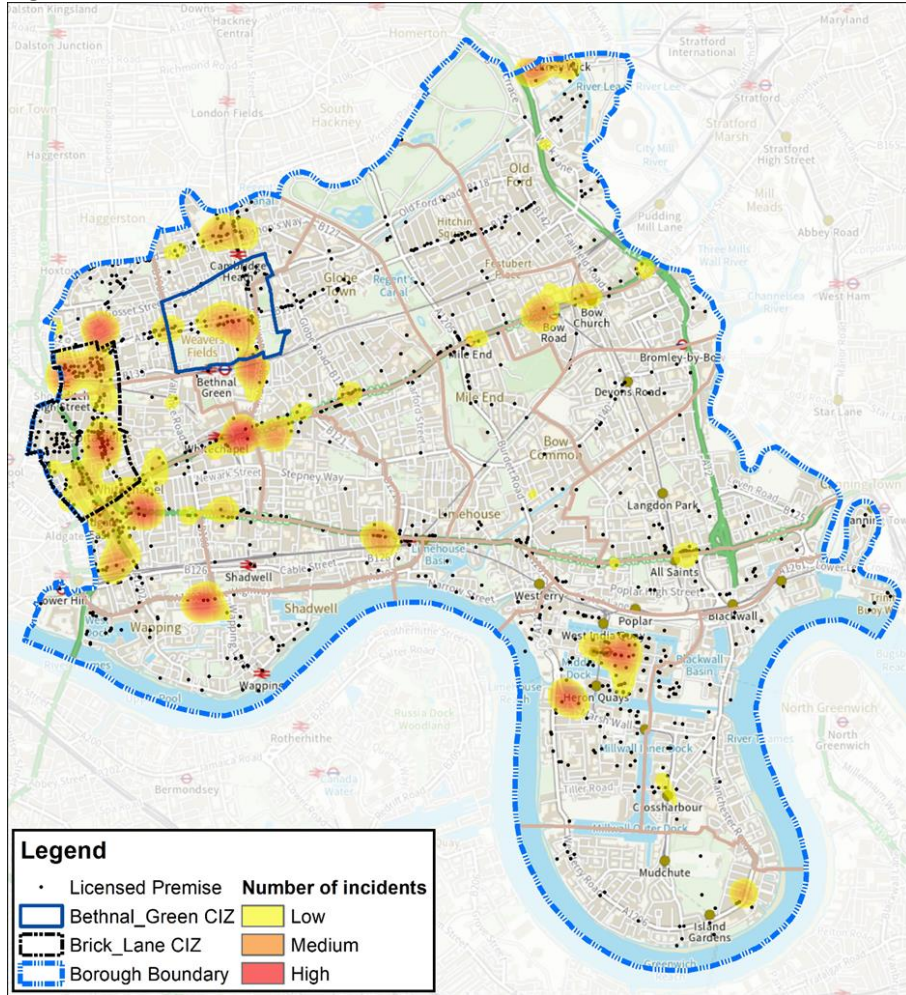
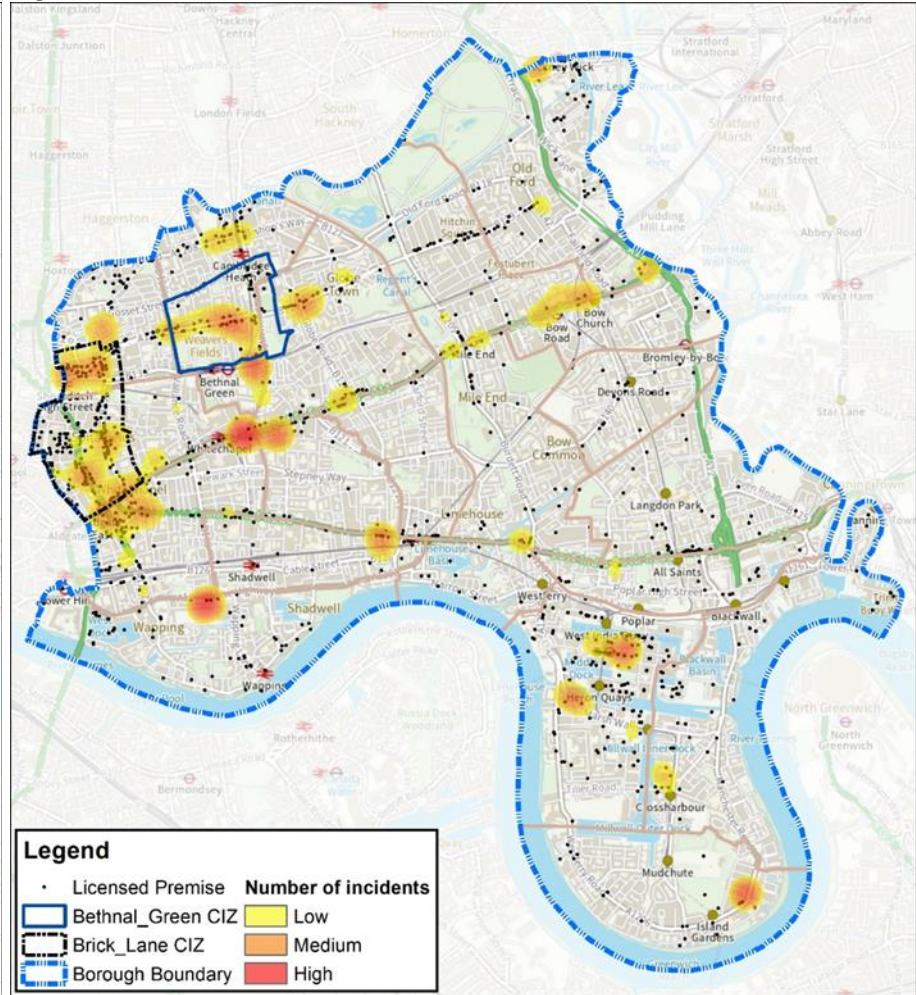


Figure 4: 2023 (end June)





Police Calls Hotspot Maps from Police Calls Analysis Report produced by the Metropolitan Police

Figure 5: 2020

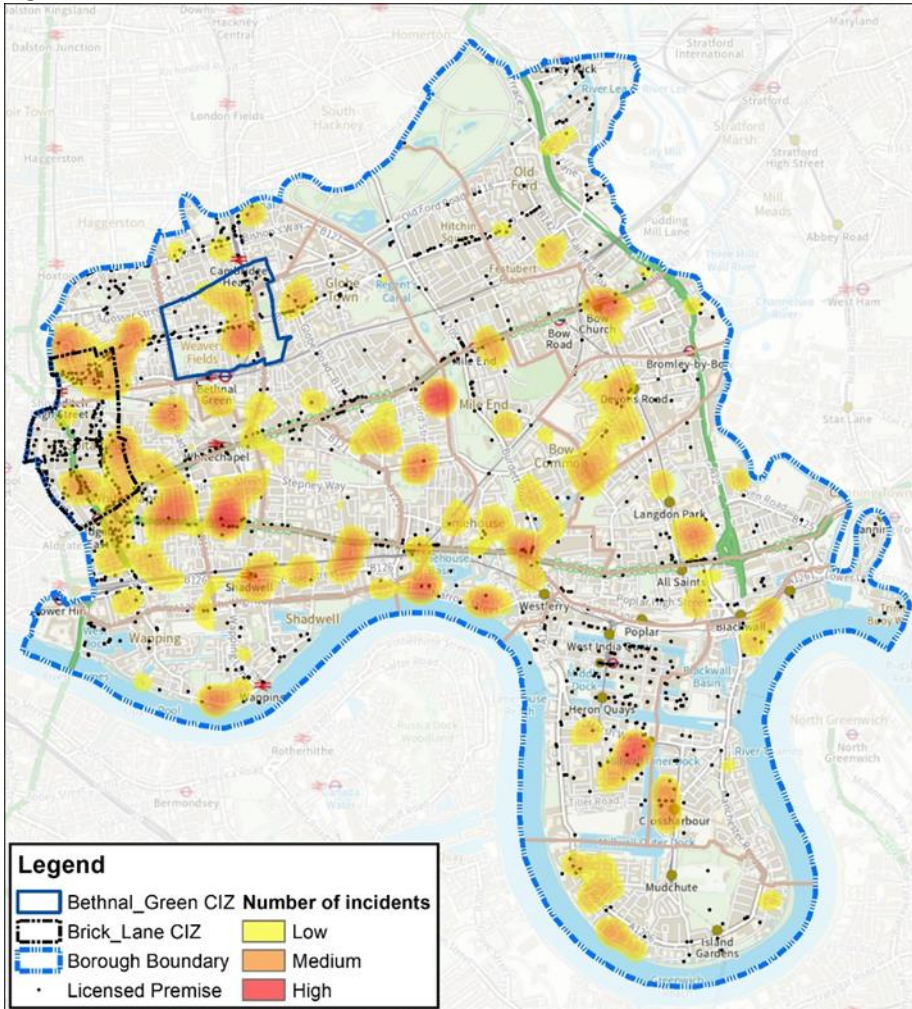


Figure 6: 2021

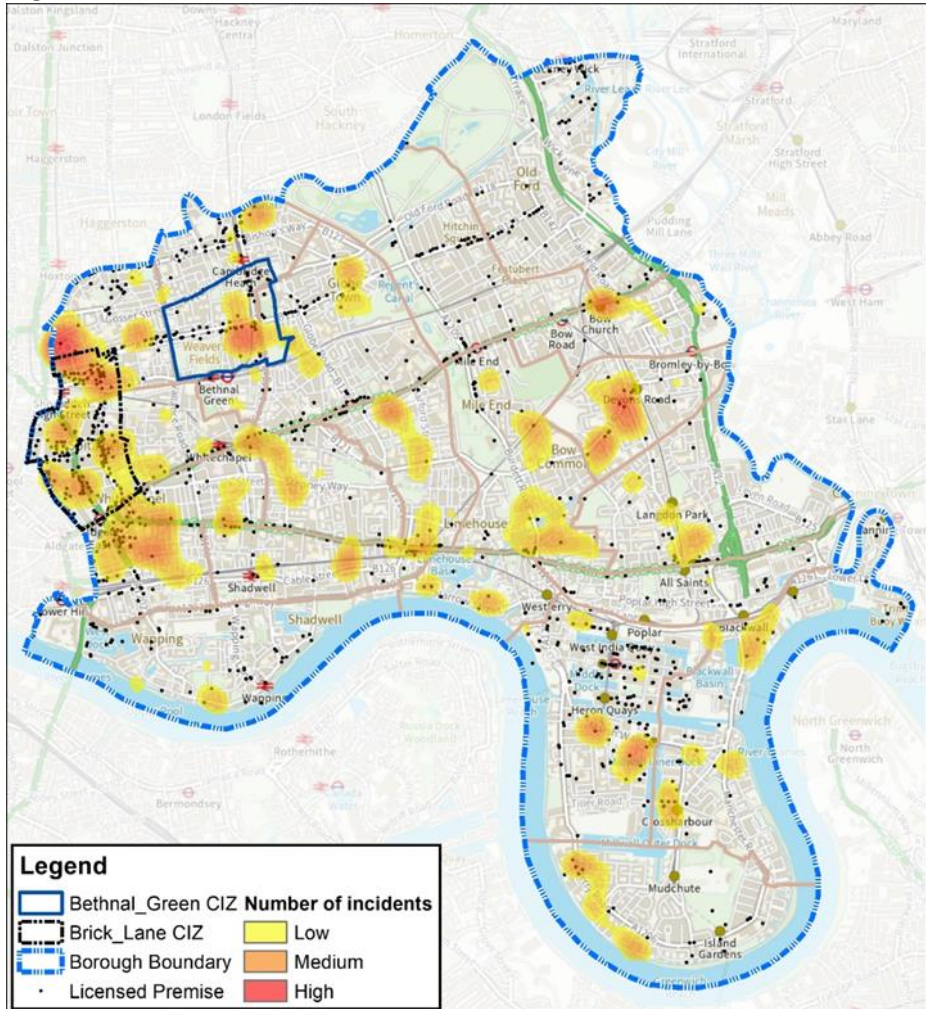


Figure 7: 2022

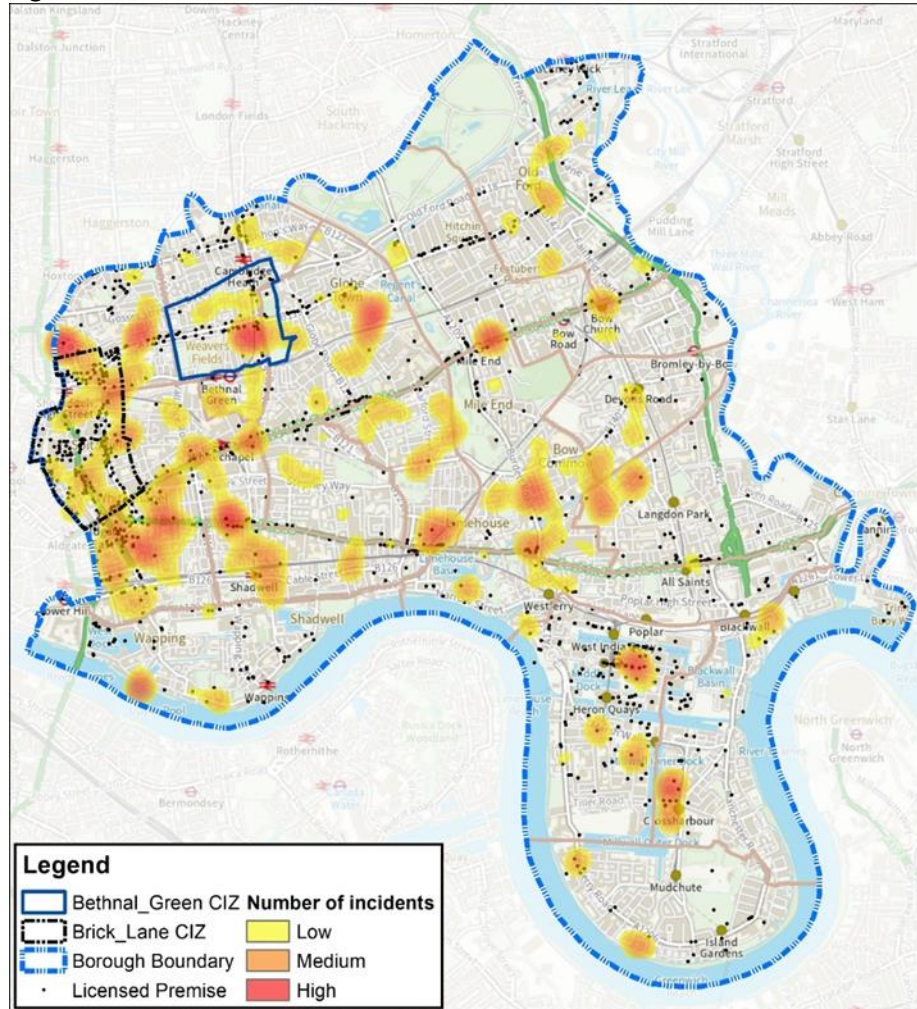
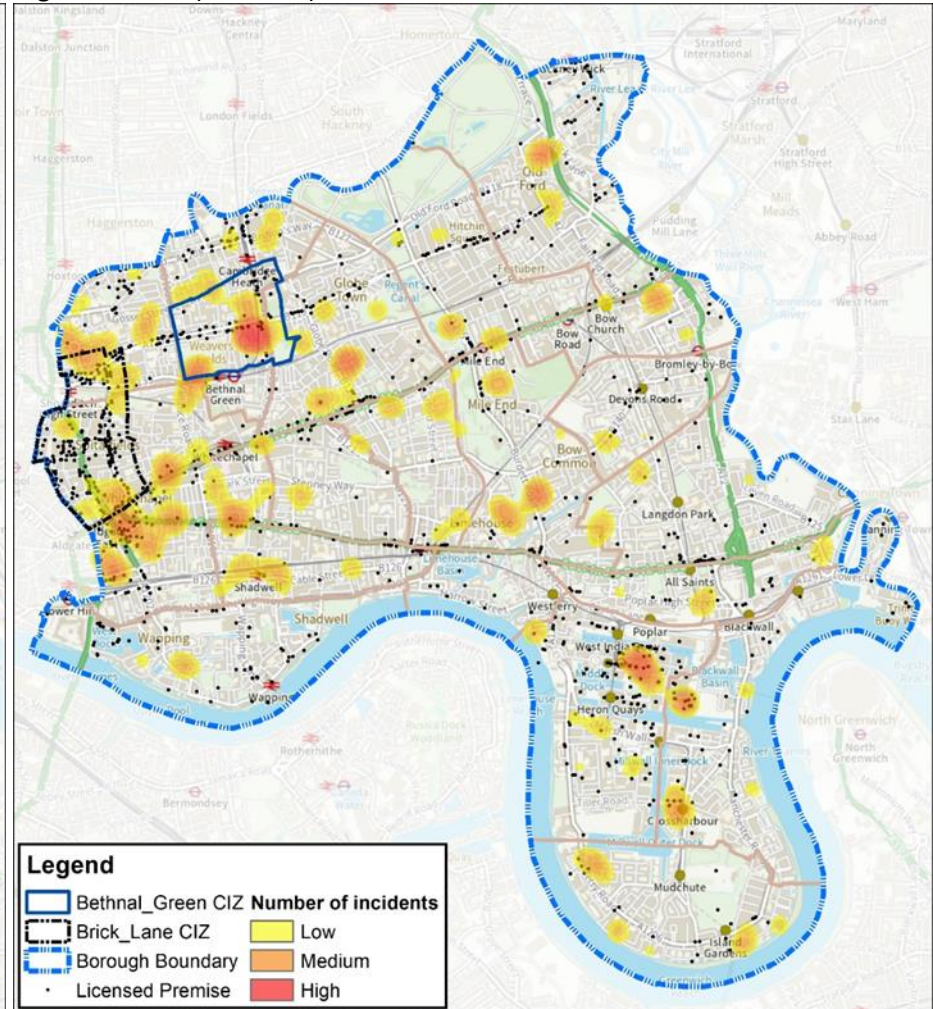


Figure 8: 2023 (end June)



Licensing and Noise Complaint received by Environmental Health and Trading Standards Service

Figure 9

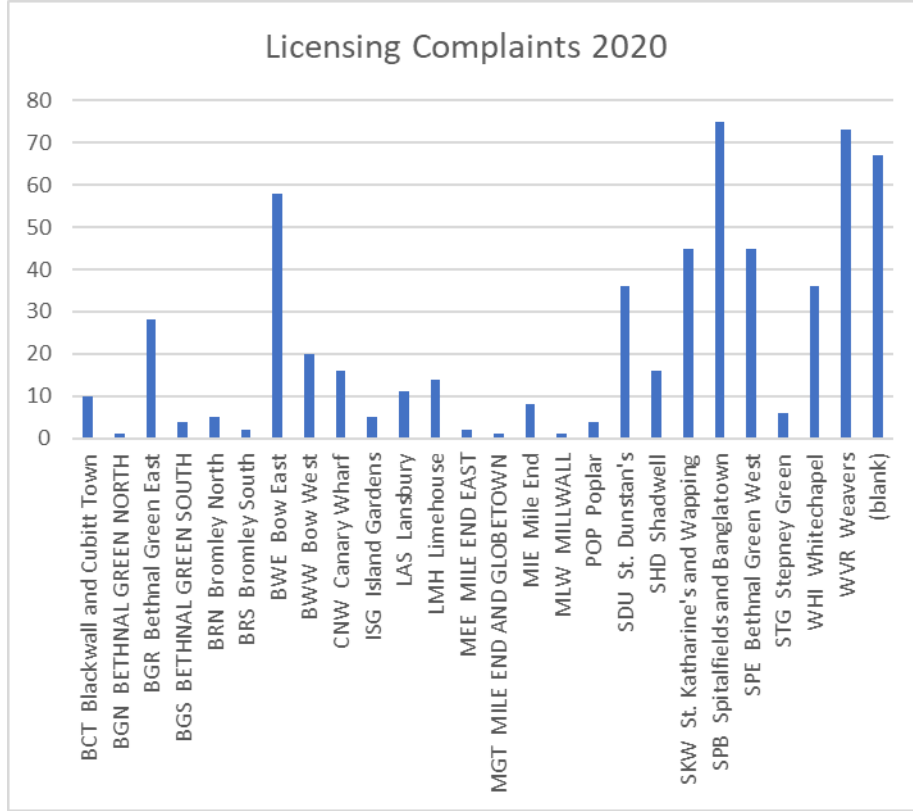


Figure 10

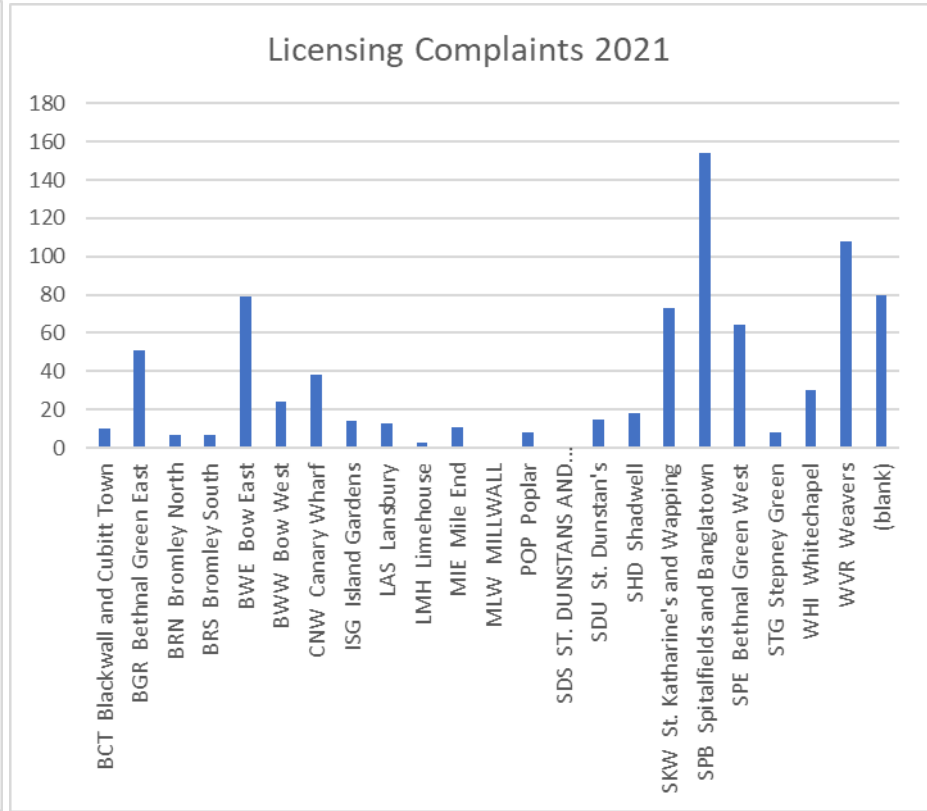


Figure 11

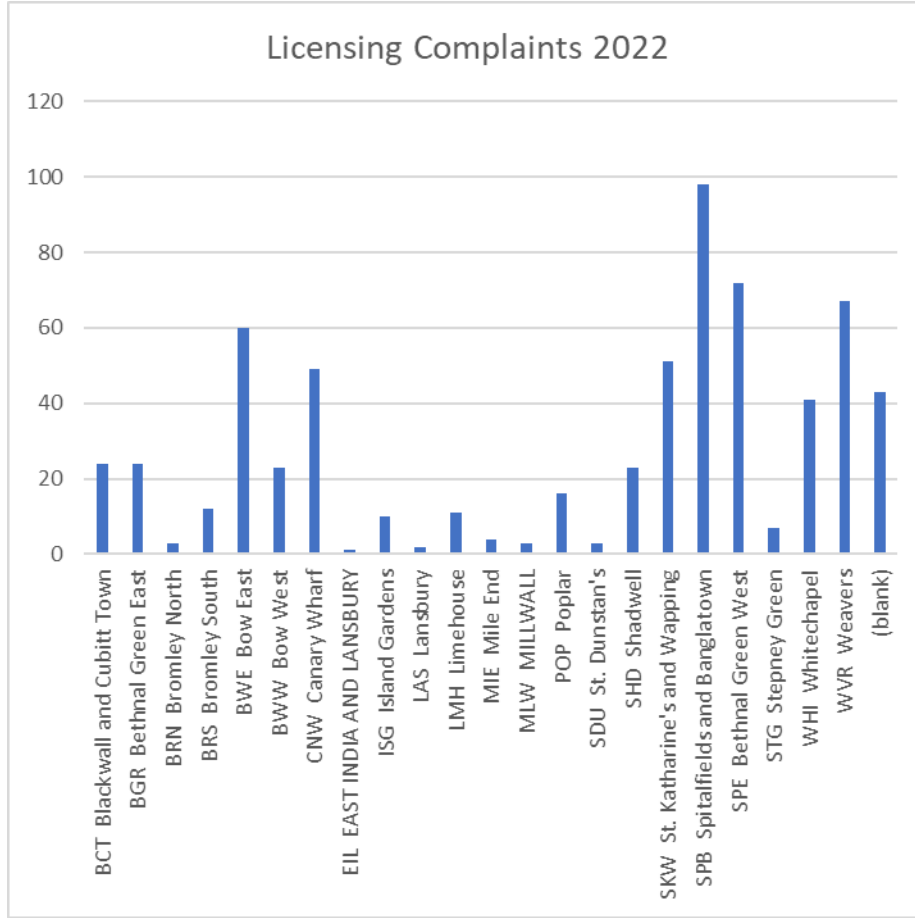


Figure 12

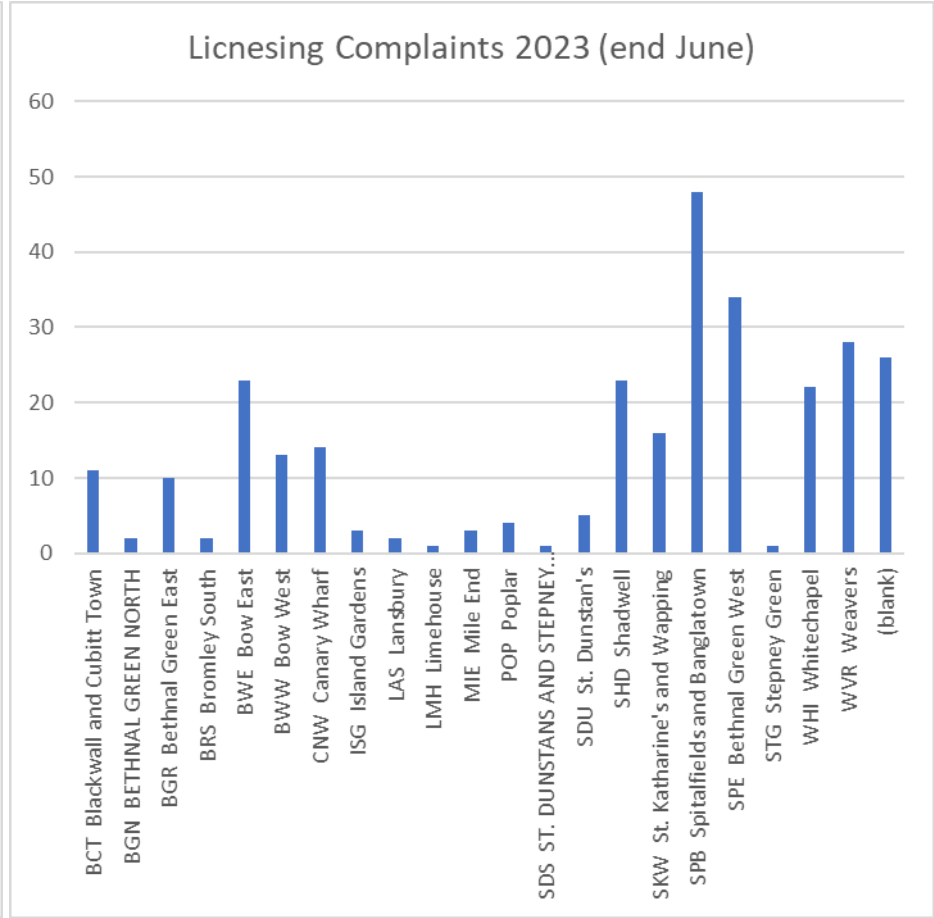


Figure 13

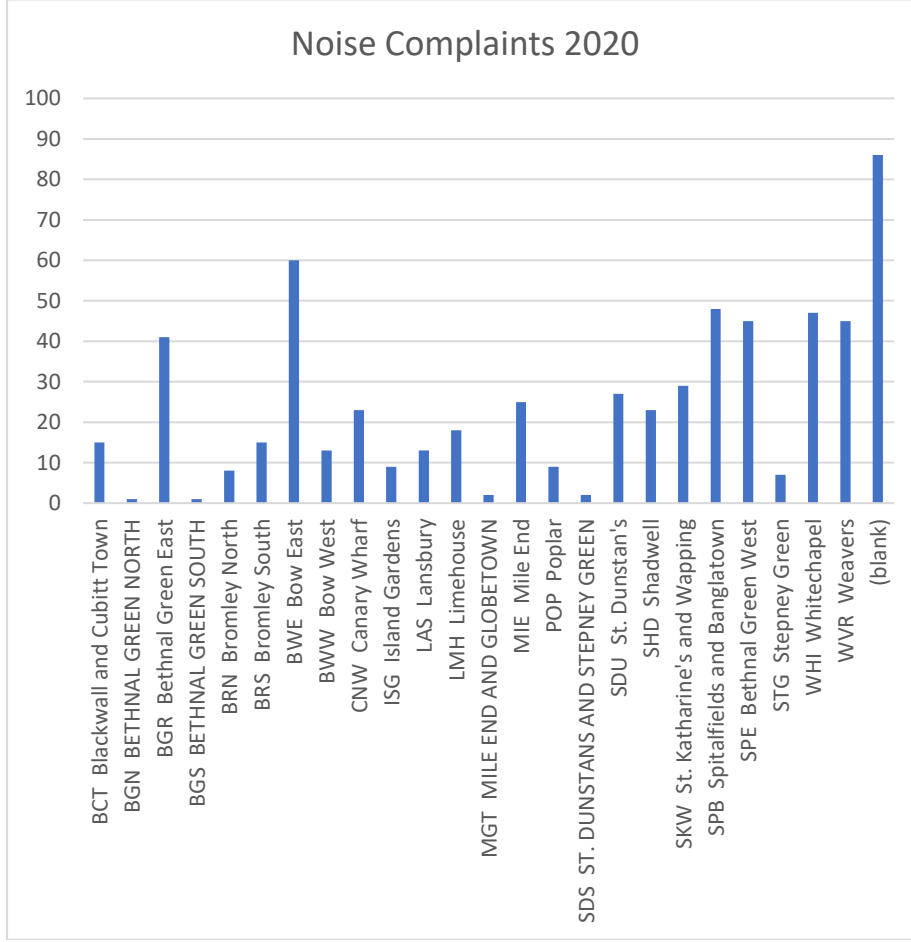


Figure 14

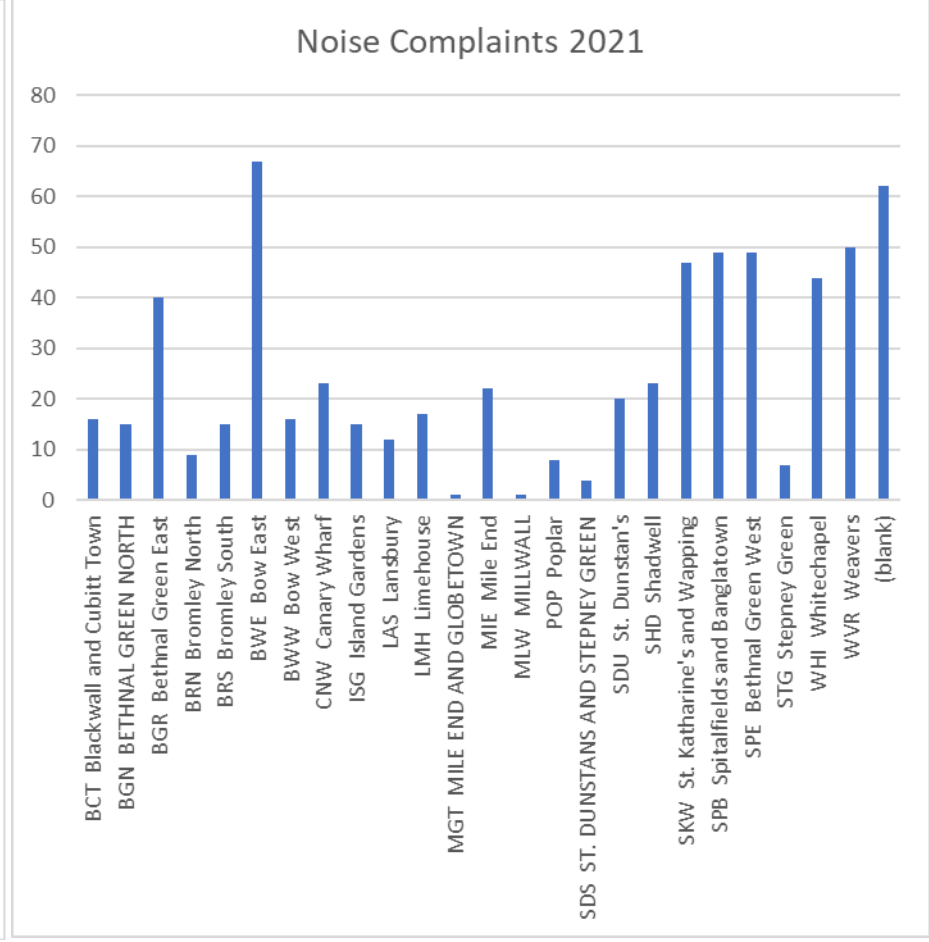


Figure 15

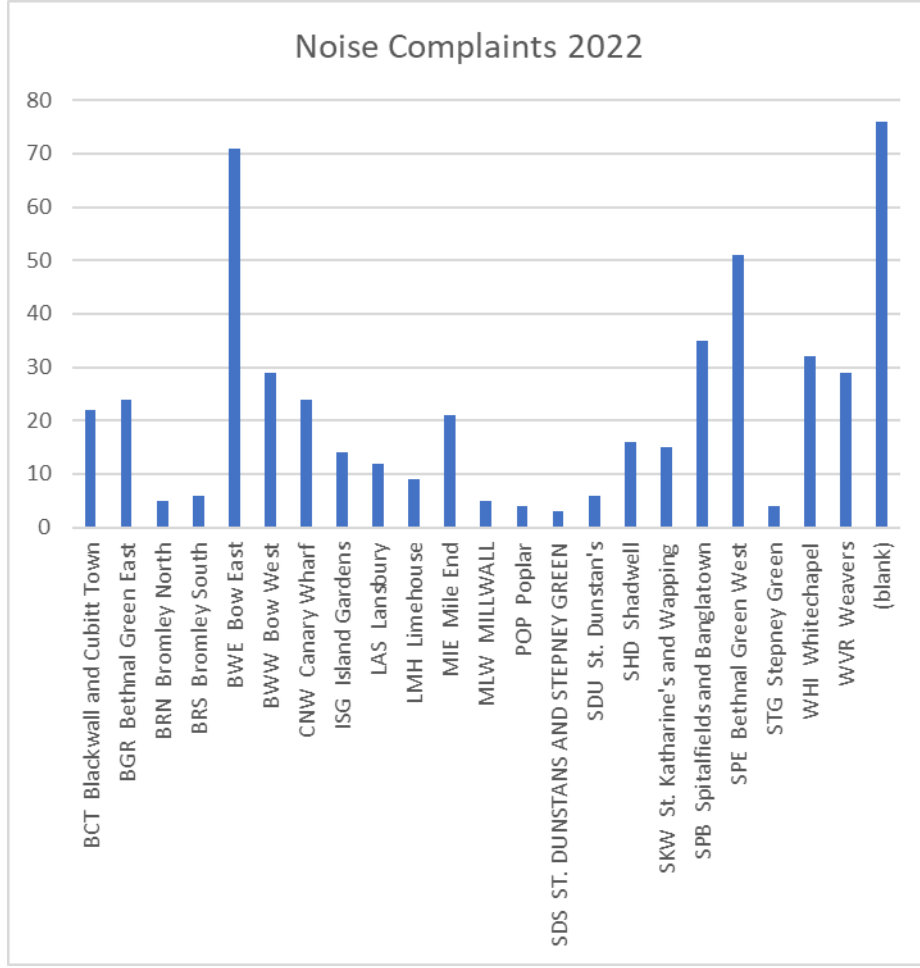
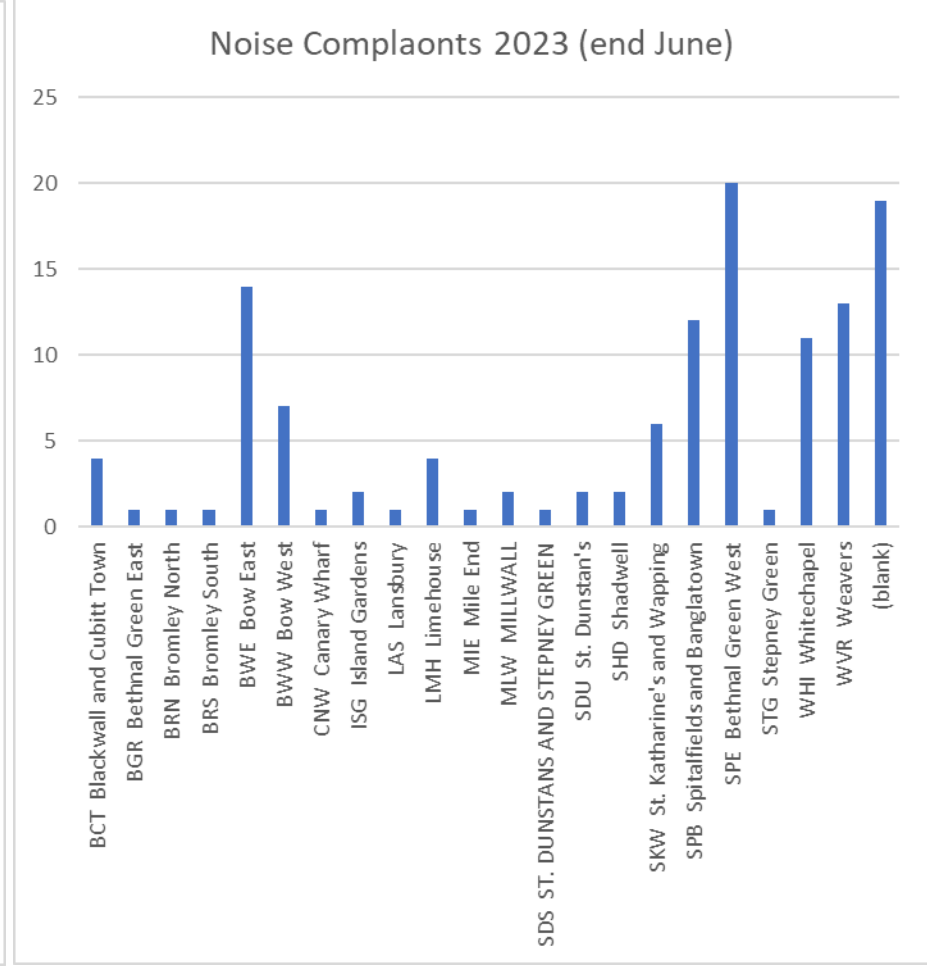


Figure 16



London Ambulance Call Outs linked to Licensed Trade

Figure 17

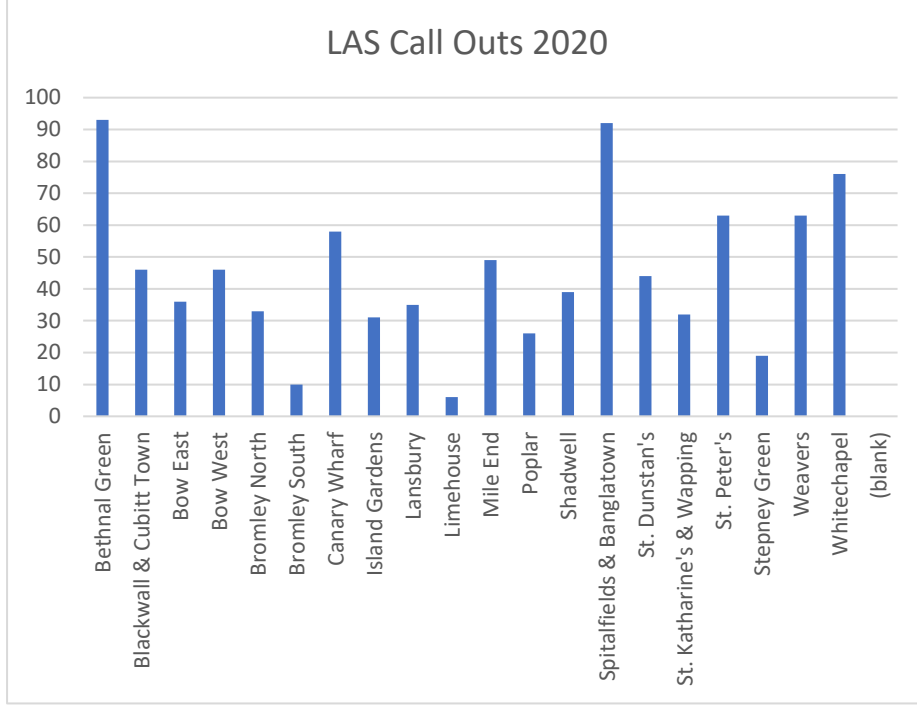


Figure 18

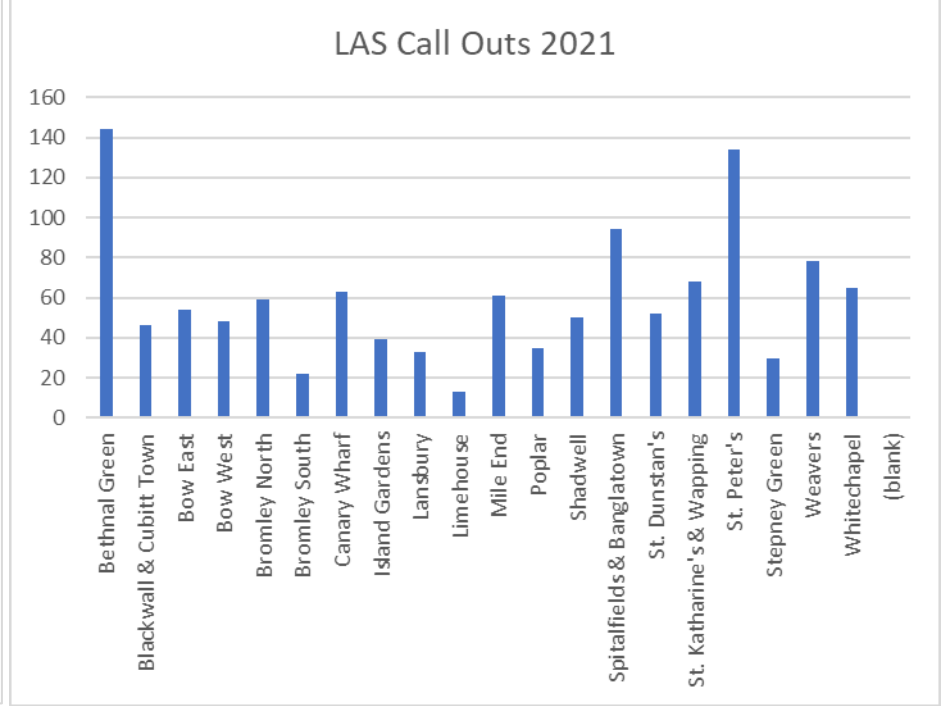


Figure 19

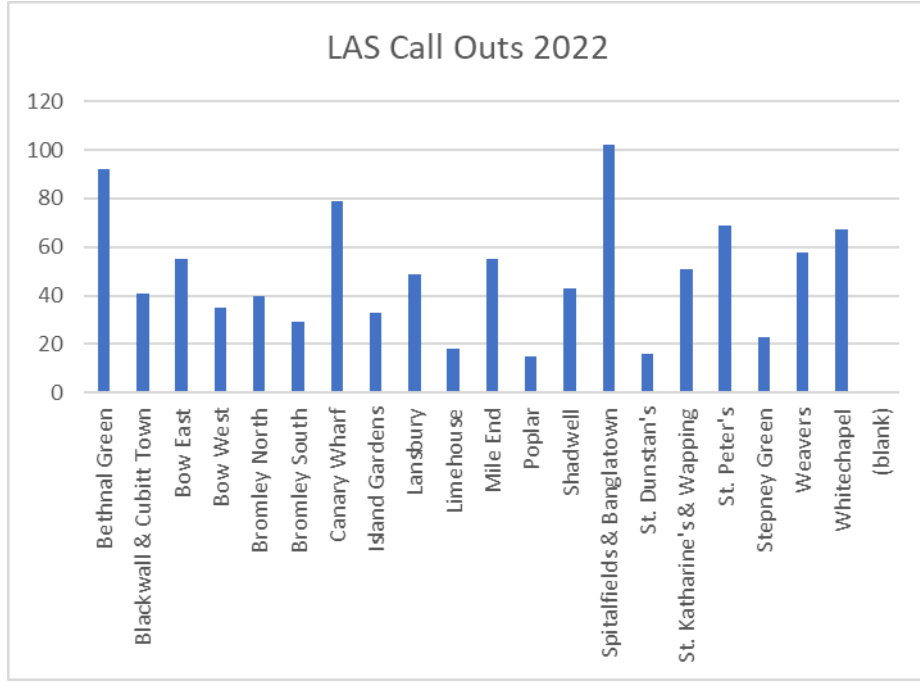
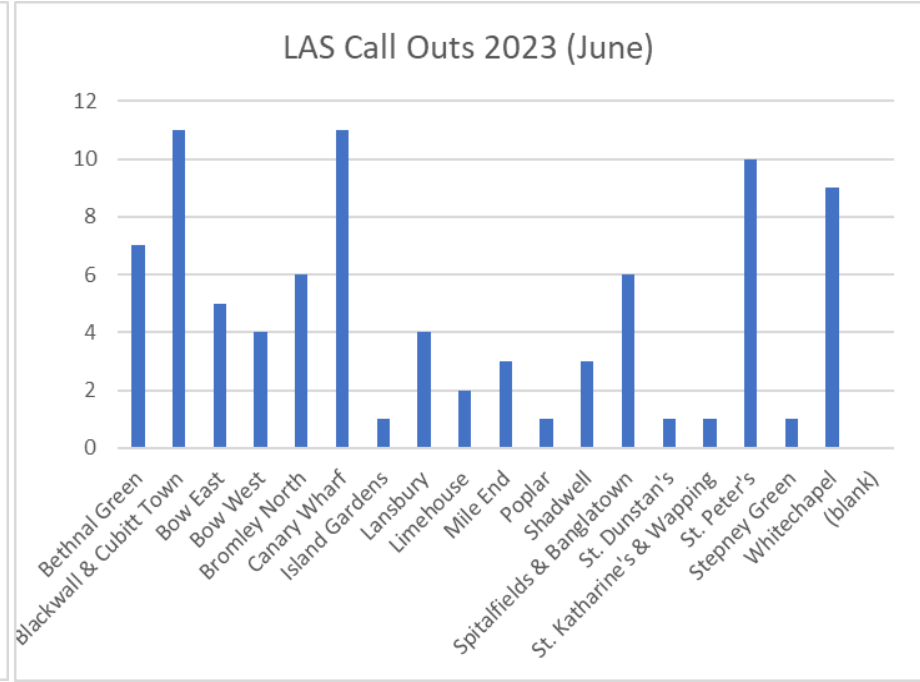


Figure 20





## Equality Impact Analysis Screening Tool

### Section 1: Introduction

<b>Name of proposal</b> For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Cumulative Impact Assessment Policy 2024 - 2027
<b>Service area and Directorate responsible</b>
Communities/Public Realm
<b>Name of completing officer</b>
Tom Lewis, Service Manager, Regulatory Services (Commercial)
<b>Head of Service</b>
Tom Lewis, Service Manager, Regulatory Services (Commercial)

**The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:**

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

### Section 2: Summary of proposal being screened

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

This is a Policy that the Council introduce under the Licensing Act 2003. The Council must review its Cumulative Impact Policies every 3 years.

The Council has two Cumulative Impact Policies or Cumulative Impact Assessments (CIA). The Council's first CIA in Brick Lane has been in place now for approximately 7 years and the second one, which is in Bethnal Green has been in place for 3 years.

The review of these CIAs considers:

- Retaining the Brick Lane CIA (Cumulative Impact Assessments), and expanding it to its south and southeastern edge,
- Removing the Bethnal Green CIA (Cumulative Impact Assessments)

The Cumulative Impact Assessments (CIAs) seek to help reduce the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises is having a cumulative impact and leading to problems, which are undermining the licensing objectives:

- Prevention of crime and disorder,
- Public safety,
- Prevention of public nuisance,
- Protection of children from harm.

In considering the policy in view of the Equality Act 2010, though there could be a view that there may be an effect on religious/belief the reason for the policy is statutory. The Policy sits alongside the Council's Statement of Licensing Policy 2022 – 2028, which includes Equality and Inclusion in Licensed Venues and discusses PSED and links the policy to the Council's Equality Policy, it does not appear that there are likely to be any adverse effects on people who share Protected Characteristics as defined by the 2010 Act.

### Section 3: Equality Impact Analysis screening

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?</p> <p>Please consider the impact on overall communities, residents, service users and Council employees.</p> <p>This should include people of different:</p>	Yes	No	Comments
<ul style="list-style-type: none"> <li>▪ Sex</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ Age</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

<ul style="list-style-type: none"> <li>▪ <b>Race</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ <b>Religion or Philosophical belief</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ <b>Sexual Orientation</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ <b>Gender re-assignment status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ People who have a <b>Disability</b> (physical, learning difficulties, mental health and medical conditions)</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ <b>Marriage and Civil Partnerships status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>▪ People who are <b>Pregnant and on Maternity</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<p>You should also consider:</p> <ul style="list-style-type: none"> <li>▪ <b>Parents and Carers</b></li> <li>▪ <b>Socio-economic status</b></li> <li>▪ People with different <b>Gender Identities</b> e.g. Gender fluid, Non-binary etc.</li> <li>▪ Other</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Analysis is required**. The only exception to this is if you can 'justify' the discrimination (Section 4).

## Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the council to implement this activity	<input type="checkbox"/>

## Section 5: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

### Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Comments

The decision-making body is recommended to consider:

- Retaining the Brick Lane CIA (Cumulative Impact Assessments), and expanding it to its south and southeastern edge,
- Removing the Bethnal Green CIA (Cumulative Impact Assessments)

This is a Policy that the Council introduce under the Licensing Act 2003. The Council must review its Cumulative Impact Policies every 3 years.

The Cumulative Impact Assessments (CIAs) seek to help reduce the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises is having a cumulative impact and leading to problems, which are undermining the licensing objectives:

- Prevention of crime and disorder,
- Public safety,
- Prevention of public nuisance,
- Protection of children from harm.

This policy creates a rebuttable presumption that applications for licences under the Licensing Act 2003 in areas covered by the policy, which are likely to add to the existing cumulative impact, will normally be refused following the receipt of representations unless the applicant can demonstrate in the operation schedule that there will be no negative cumulative impacts with one or more of the licensing objectives.

A statutory consultation process commenced on 31<sup>st</sup> January and 25<sup>th</sup> April 2024.

The policy will be agreed by the full Council.

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