

Appendix Seven – CIA Consultation Written Responses and Summary Table

	Responder Description	Supports the Retention and Expansion of Brick Lane CIA (Y/N)	Support the Removal of Bethnal Green CIA (Y/N)	Comment	Page No.
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"> - Alcohol harms - Inequality - Cumulative Impact Zones: an opportunity for greater scrutiny of alcohol licences 	
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
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Alcohol harms

In England, among people aged 15 to 49 years, alcohol is the leading cause of ill-health, disability, and death^{1,2}. 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 cancer². 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 alcohol³. 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 2022⁴. 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 2022⁴. 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 year². There is some evidence that increases in alcohol availability locally is associated with increases not only in consumption, but also in alcohol-related harm⁵. 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 all⁶. There is evidence that binge drinking increases your risk of long-term health problems including becoming dependent on alcohol, alcohol-related cancer and heart disease⁷. Binge drinking can also affect memory and, in the longer term, can lead to serious mental health problems⁸, with some evidence showing it is linked to suicide⁹.

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 decreased¹⁰. 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 deprivation¹¹.¹² 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 outcomes¹³. 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 UK¹⁴. Furthermore, 44% of older people in Tower Hamlets live in low-income households, also the highest proportion in England¹⁵. 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 year¹⁶. In addition to the health harms associated with alcohol consumption, alcohol contributes to broader societal harms including crime, violence, anti-social behaviour and disorder¹⁷, 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 misuse¹⁸.

As part of the 2003 Licensing Act¹⁹, 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 sustained²⁰. 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 areas²¹. 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 NTE²². 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.