

Cumulative Impact Assessment

1. Cumulative Impact is defined as the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area. In some areas where the number, type or density of licensed premises is high, or exceptional, serious problems of nuisance, crime or disorder may occur within or some distance away from the area.
2. A Cumulative Impact Assessment may be published by a Licensing Authority to help it to limit the number or type of applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives.
3. The Policing and Crime Act 2017 (Section 141) sets out what a Licensing Authority must do in order to publish a Cumulative Impact Assessment (CIA). This includes publishing the evidential basis for its opinion and consulting on this evidence. A CIA must be published, and consulted upon, every three years. The evidence underpinning the publication of the CIA must be suitable as a basis for a decision to refuse an application or impose conditions.
4. The evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the particular problems identified in the specific area to be covered by the CIA. The Secretary of State's Guidance provides a list of Information which licensing authorities may be able to draw on when considering whether to publish a CIA including:
 - local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
 - statistics on local anti-social behaviour offences;
 - health-related statistics such as alcohol-related emergency attendances and hospital admissions;
 - environmental health complaints, particularly in relation to litter and noise;
 - complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
 - residents' questionnaires;
 - evidence from local and parish councillors;
 - evidence obtained through local consultation;
 - Underage drinking statistics.

The steps taken to develop the Special Policy on Cumulative Impact

5. Whilst the Statement of Licensing Policy has incorporated a Special Policy on Cumulative Impact since 2006, this has been reviewed periodically as required by the Act, including the last review carried out in 2023 to take into account the changes brought about by the Policing and Crime Act 2017.

6. For this review, a report was compiled that plotted the density of licensed premises in the borough against police, ambulance and noise data obtained between April 2021 and March 2024. This was mapped and analysed and presented to the Regulatory Committee on the 20th June 2024. Of the two existing areas where a special policy was in place, the Committee were of the view that there was strong evidence to indicate that two should remain in place. A full consultation was then carried out with residents and businesses in the borough, or their representatives, as well as with the responsible authorities under the Licensing Act 2003. A copy of the evidence considered by this Committee is available in the report of the Regulatory Committee of the 20th June 2024, available on request or on the Council's website www.richmond.gov.uk.
7. A further meeting of the Regulatory Committee was held on the 8th October 2024 when the results of the consultation were fully considered and the areas where a special policy on Cumulative Impact will apply were agreed. A copy of the evidence considered by this Committee and minutes of the discussion are available on request or on the Council's website www.richmond.gov.uk.

8. Cumulative Impact Assessments (CIA) and Cumulative Impact Policy (CIP)

- 8.1.1 Having regard to the Cumulative Impact Assessment, a Special Policy on Cumulative Impact will apply to the areas as listed in the following sections. The separate areas where Cumulative Impact Assessments have been published are referred to as Cumulative Impact Zones (CIZ).
- 8.2 The Cumulative Impact Policy, in conjunction with the Cumulative Impact Assessment has the following effect:
 - a) The CIP creates an evidential presumption: namely. that it is likely that applications for the grant of any further relevant authorisations in the areas identified in the CIA would negatively impact on the licensing objectives.
 - b) It is for an applicant to rebut that presumption.
 - c) Those making representations against an application for a further relevant authorisation in respect of premises located in an area the subject of a CIP are not required to adduce evidence that there would be negative cumulative impact if the application were granted. The policy presumption applies whether or not they adduce evidence.
 - d) The likely negative impact presumed by the Policy is not limited to an impact on the immediate vicinity of the premises the subject of an application but extends to the whole of the CIA areas.

Cumulative Impact Assessments (CIA)

9. A Special Policy on Cumulative Impact will apply to the following areas:

10. Richmond Town Centre

10.1 The area included in the Richmond Town Centre CIA is shown in Figure 1 below.

10.2 The special policy relates to all applications for new licences or variations that increase the hours or capacity or add licensable activities.

10.3 Richmond Town Centre lies primarily within South Richmond Ward but also extends into North Richmond Ward. It is a vibrant area with a diverse offering of entertainment venues. It has the highest concentrations of licensed premises in the borough.

10.4 The Cumulative Impact Assessment identified that the South Ward has the highest recorded level of complaints to the police about violence with injury, assaults and anti-social behaviour, the highest number of ambulance call outs for assault and the second highest for ambulance call outs for alcohol. Although relatively low in numbers, the area also attracts a number of complaints to the Council's licensing team. Richmond Town Centre also records the highest incidence of assaults and anti-social behaviour. Richmond Town Centre has the highest density of licensed premises in the borough. Whilst levels of crime and anti-social behaviour across Richmond is low compared to other London boroughs, the high density of licensed premises in Richmond Town Centre is impacting adversely on crime and anti-social behaviour in the area.

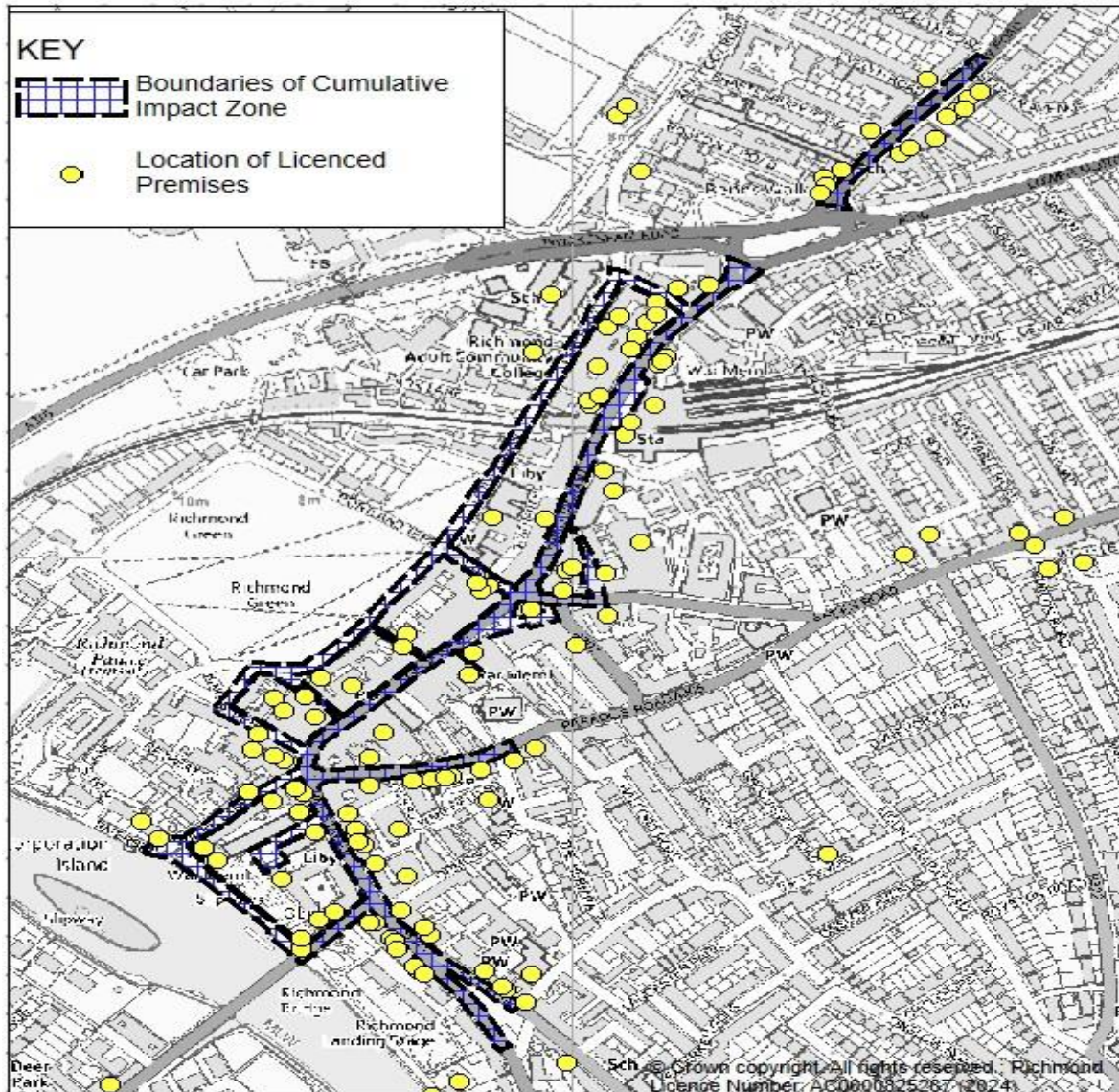
10.5 The Authority recognises that it must balance the needs of business with those of local residents. However, currently the number and type of premises are impacting negatively on the licensing objectives. In adopting the special policy, the authority is setting down a strong statement of approach to considering applications for the grant or variation of premises licences in the Richmond Town Centre CIA. The authority considers that the number of licensed premises in Richmond Town Centre Cumulative Impact Area is such that is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.

10.6 However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, whilst large nightclubs or late-night bars and public houses might add to the problems of cumulative impact, a small restaurant or theatre may not. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

Premises that are not alcohol led and

- i. support the people visiting the area during the day; and/or
- ii. support the ethos of a family friendly area; and/or

Fig - 1 Richmond Town Centre CIA.



11. Twickenham Town Centre

11.1 The area included in the Twickenham Town Centre CIA is shown in Figure 2 below.

11.2 The special policy relates to all applications for new licences or variations that increase the hours or capacity or add licensable activities.

11.3 Twickenham Town Centre lies within Twickenham Riverside Ward. Plans to redevelop Twickenham Riverside are well advanced with provision for new open spaces, restaurants, housing and offices opening up to the River Thames. This redevelopment is designed to be family friendly, and it is anticipated that it will be an attraction for visitors, thus changing the dynamic of the area.

- 11.4 This Ward has the second highest level of complaints to the police about violence with injury (non-domestic) and assaults. The Ward also records high levels of anti-social behaviour and ambulance call outs. Twickenham Town Centre has the second highest density of licenced premises in the borough. The high density of licensed premises in Twickenham Town Centre is impacting adversely on crime and anti-social behaviour in the area.
- 11.5 The Authority recognises that it must balance the needs of business with those of local residents. However, currently the number and type of premises are impacting negatively on the licensing objectives. In adopting the special policy, the authority is setting down a strong statement of approach to considering applications for the grant or variation of premises licences in the Twickenham Town Centre CIA. The authority considers that the number of licensed premises in Twickenham Town Centre Cumulative Impact Area is such that is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives
- 11.6 However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, whilst large nightclubs or late-night bars and public houses might add to the problems of cumulative impact, a small restaurant or theatre may not. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:


Premises that are not alcohol led and


- i. support the people visiting the area during the day; and/or
- ii. support the ethos of a family friendly area; and/or
- iii. support the wider cultural offering in the area.

Fig - 2 Twickenham Town Centre CIA.

Official

Cumulative Impact Zone, Twickenham Town Centre

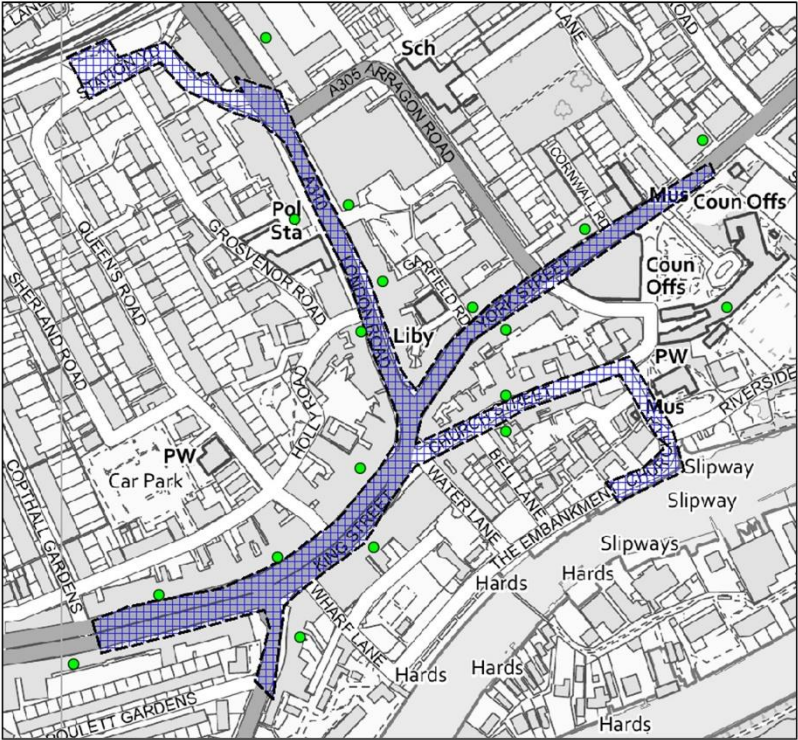
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Boundaries of
Cumulative Impact Zone
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Location of licensed premises
(on or off sales)



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