

Cumulative Impact Policy

Additional Information from Derbyshire Constabulary

Additional information to support the introduction a Cumulative Impact policy within Derby City Centre including Off - Licences

Title of paper:	Additional information to support the introduction a Cumulative Impact policy within Derby City Centre including Off - Licences.
Author:	Inspector Stephen Fairbrother Derbyshire Constabulary
Date:	18 th August 2011
Brief outline of content The paper explores the necessity for Off Licences to be included within a proposed Cumulative Impact policy within Derby City Centre.	
It is recommended that Derby City Council adopt a cumulative impact policy for the City Centre that includes Off Licences.	

Policy Context

The Licensing Act 2003 specifies four licensing objectives, as detailed below:

- The prevention of crime and disorder.
- Public safety.
- The prevention of public nuisance.
- The protection of children from harm.

Cumulative Impact is not mentioned specifically in the Licensing Act 2003. However, the Secretary of States Guidance sets out, in Chapter 13, information regarding the cumulative impact of a concentration of licensed premises. Cumulative Impact is the potential to impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. Cumulative Impact policies are considered appropriate in areas where the number, type and density of premises selling alcohol are unusual and serious problems of nuisance and disorder may be arising or have begun to arise outside or some distance from licensed premises. For example, concentrations of young drinkers can result in queues at fast food outlets and for public transport. Queuing in turn may be leading to conflict, disorder and antisocial behaviour. While more flexible licensing hours may reduce this impact by allowing a more gradual dispersal of customers from premises, it is possible that the impact on surrounding areas of the behaviour of the customers of all premises taken together will be greater in these cases than the impact of individual premises.

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Local Authorities may, within their Licensing Policy Statements, adopt a special policy with respect to "Cumulative Impact". A Policy of this kind reverses the presumption that all applications will normally be granted, except for relevant representations and creates a rebuttable presumption that applications for new premises licences, club premises certificates or variations that are likely to add to the existing cumulative impact, thereby increasing the levels of crime and disorder currently being experienced, will normally be refused.

The Secretary of States Guidance issued under Section 182 paragraph 13.33 states "It would **normally not be justifiable** to adopt a special policy on the basis of a concentration of shops, stores or supermarkets selling alcohol for consumption off the premises. Special policies will usually address the impact of a concentration of licensed premises selling alcohol for consumption on the premises." Further to my previous application dated the 3rd November 2010, I suggest that this does not automatically mean that off licences cannot be included when there is a justifiable argument for their inclusion within a special policy.

THE PROPOSAL

Current Position

On the 18th July 2011, the General Licensing Committee met to consider a previous application, dated the 3rd November 2011, to introduce a Cumulative Impact Policy. A Cross party working group had previously met to consider the information contained in the application and the comments that had been received during the consultation process. The Cross party working group had made recommendations to the Committee which were considered. A discussion followed about the merits of the inclusion of Off Licences premises within the proposed Cumulative Impact policy. It was felt that the justifications for the inclusion were, at best, inconclusive and members expressed a desire for detailed evidence on the impact of the City Centre Off Licences on the four licensing objectives before taking a final decision.

Reasons for the CIP approach

No cumulative impact policy (CIP) should be adopted unless there is a sound reason to do so. The Police have undertaken research in respect of Derby City centre as defined by the Inner Ring Road to identify the correlation of the high concentration of Off licensed premises and high levels of crimes and that contribute to the offence types that are associated with the night-time economy. The majority of Off licensed premises in Derby City centre are well run, however the sheer volume and concentration of premises within the City Centre is having a negative impact on the licensing objectives.

The Council, acting as the Licensing Authority for Derby, can consider the evidence of crime and the concentration of Off licensed premises within the City Centre. The Council needs to be satisfied that it is appropriate and necessary to adopt a CIP in the City centre in order to promote the licensing objectives.

It should be noted that the Council and partner organisations already employ a range of mechanisms to prevent or limit cumulative impact relating to the problems arising from premises, and their customers behaving badly or unlawfully once away from the premises. The measures currently employed include the provision of night bus

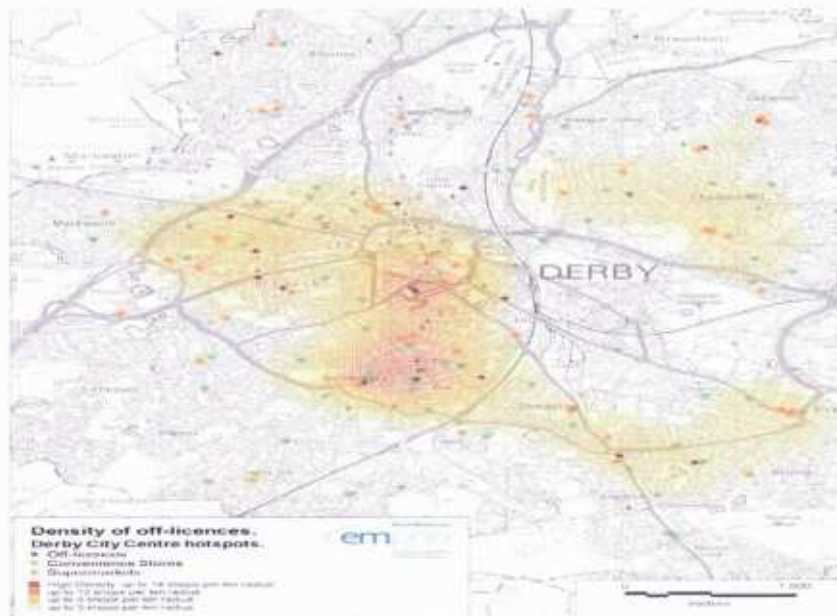
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services, the use of Taxi Marshals to supervise and control taxi ranks, the presence of Street Pastors in the town centre late at night at weekends to assist people who may be in difficulty, extensive CCTV coverage and monitoring of the town centre, regular joint enforcement operations, pro-active use of dispersal orders to improve the town centre environment and working in partnership with the Licensing Trade, namely Pubwatch and a recently formed Doorwatch.

Supporting evidence for CIP including Off licences

National Crime Survey Statistics have consistently demonstrated that around half of all violent crime and 90% of anti social behaviour is alcohol related. Alcohol is known to be a major cause in city centre assaults and domestic violence. Misuse of alcohol causes disorder, disrupts our communities and places a huge burden upon all emergency services. Nationally, around 39% of people arrested by Police are intoxicated at the point of arrest. Derby City Centre is no exception.

In the City, the rate of alcohol related hospital admissions (per 100,000 population) has increased year on year since 2002. The North West Public Health Observatory have previously classified Derby City as having the 2nd worst rate of alcohol related hospital admissions in the East Midlands and the 15th highest number of alcohol related hospital admissions in the country.



To create a simple measure of pub and club density against resident population the East Midlands Public Health Observatory (2011) has calculated the number of Off Licences in each Output Area (a level of geography provided by the Office for National Statistics which has an average of 400 residents) as demonstrated above.

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A detailed map of the current locations of all premises that hold a Derby City Premises Licence for the sale by retail of alcohol for consumption OFF the premises is attached as Appendix 1. This includes premises that may not immediately be identified as an Off Licence but hold a premises licences should their core business change. The proposed area for the Cumulative Impact policy is confined to the natural boundaries as recognised as the City Centre Inner Ring Road.

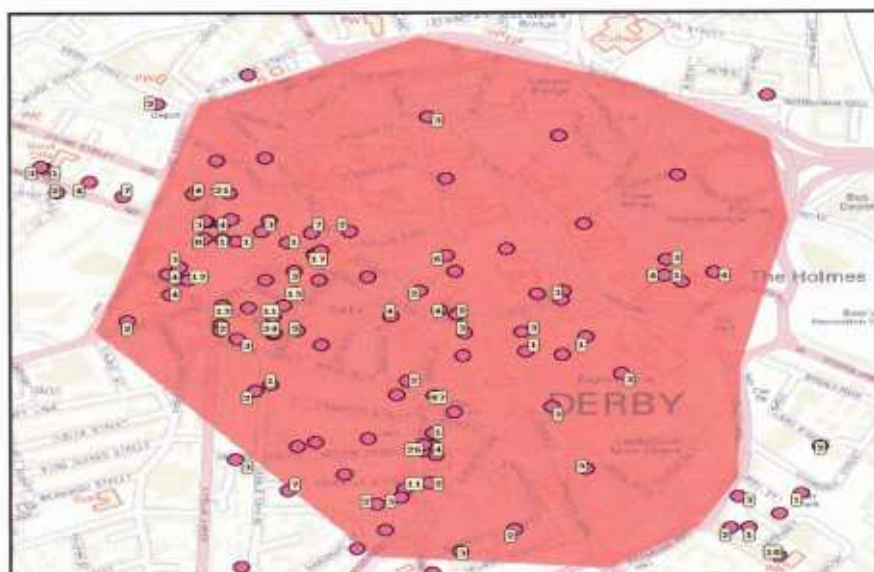
Analysis of ASB and Crimes within the Inner Ring Road

Alcohol misuse in Derby generally contributes to a disproportionate level of recorded crime, violent crime, and domestic and sexual violence. The amount of Anti Social Behaviour and Crime which have occurred within the Inner Ring Road specifically around street drinking, drunken behaviour and crimes linked to alcohol, focused between the period 04 August 2010 – 04 August 2011. The table below breaks down how many ASB and crimes there have been which are linked to alcohol over the last 12 months:

Incident Type	04 Aug 10 to 04 Aug 11
ASB	398
Crimes	642
GRAND TOTAL	1040

Anti Social Behaviour

The map below highlights where the ASB incidents have occurred over the past 12 months which are alcohol related:



The below analysis relates to the ASB which has occurred within the above red shaded area.

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The table below shows a breakdown of how many ASB incidents occurred over each month covered:

Month	Count
August 10	56
September 10	42
October 10	31
November 10	26
December 10	16
January 11	32
February 11	22
March 11	37
April 11	25
May 11	33
June 11	36
July 11	39
August 11	3

Peak day analysis established that Tuesday was the peak day when 77 incidents were reported, followed by Friday when 75 ASB incidents were reported. The peak time occurred between 13:00hrs to 17:59hrs. There were smaller peaks which occurred from 10:00hrs to 12:59hrs and 18:00hrs to 19:59hrs.

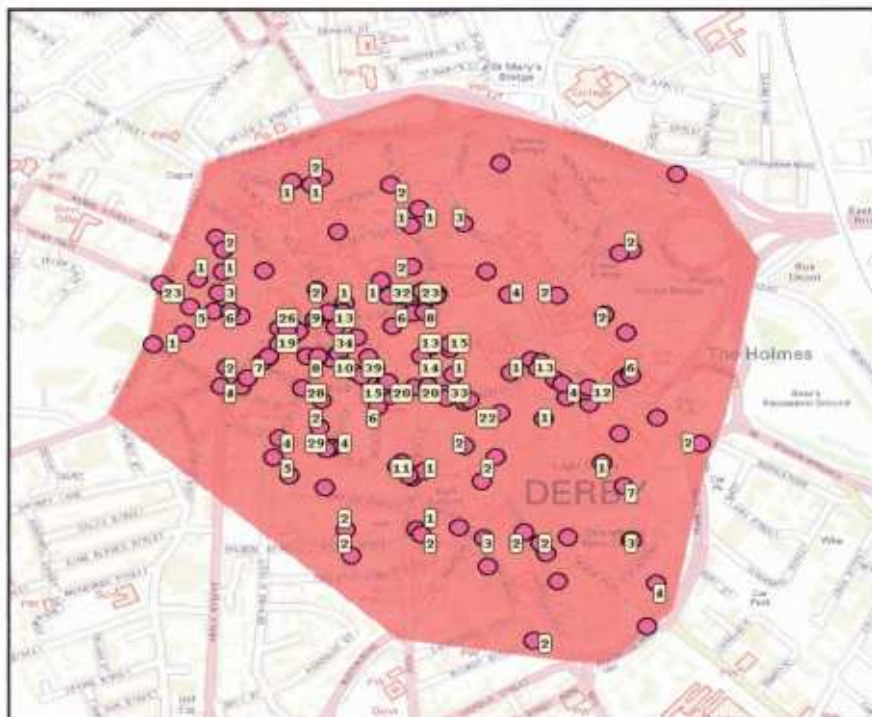
The table below shows a breakdown of the repeat locations for where alcohol related ASB has been reported on 7 or more occasions:

Location	Count
Green Lane	92
Cavendish Court, Cavendish Street	18
Night Shelter, Milestone House, 93 Green Lane	17
Beckett Street	13
Newland Street	12
Seymours Bar, 11 Cheapside	11
Job Centre Plus, Forester House, Beckett Street	11
Job Centre, Forester House, Beckett Street	9
Bar One, 1 Newland Street	9
Heritage Gate, Friary Street	7
Degge Street	7

The majority of the above locations are known for problems with City Centre Street Drinkers that purchase their alcohol, legally whilst sober, from City Centre Off Licences and then continue to cause problems after their consumption. 239 incidents of street drinking were made between 04/ 08/2010 to 31/03/2011.

The map overleaf highlights where alcohol related crimes have occurred within the Inner Ring Road. The crimes have been identified by using the force crime tag 'alcohol related incidents' and also the custom searches have been searched.

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The below analysis relates to crimes which have occurred within the above red shaded area.

The table overleaf shows a break down of the months for when the crimes have occurred during the period covered:

Month	Count
August 2010	68
September 2010	53
October 2010	65
November 2010	54
December 2010	46
January 2011	57
February 2011	56
March 2011	51
April 2011	46
May 2011	41
June 2011	47
July 2011	49
August 2011	4

Peak day analysis highlights that Sunday is the peak day for when crimes occur within the area. During Sunday 34% of crime occurred within the area; this was followed by Saturday when 26% of crime occurred. Overall during these two days

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61% of crime occurred within the area. Within the proposed area of City using the Inner Ring Road as a boundary, there were 340 assaults during 01/04/11 to 31/07/11. During the same period in 2010 there were 337 assaults.

The table below highlights the top crimes which have been frequently committed (11 offences or more) during the period covered:

HO Code	Offence	Count
008/06	ABH S47 (Not Racial/ Religious)	295
105/01	Common Assault (Not Racial/ Religious)	108
46	Theft from Shop	38
008G/01	Minor Malicious Wounding S20 Without Intent (Not Racial/ Religious)	21
058B	Damage to Non Dwelling	17
058C	Damage to Vehicle	15
125/11	Public Order S4 (Not Racial/ Religious)	13
39	Theft From Person	13
049/10	Other Theft	13
008F/01	Serious Wounding/ GBH S20 Without Intent (Not Racial/ Religious)	13
066/01	Affray (Other Offences Against the State and Public Order)	11
005/01	Wounding with Intent to do GBH (S18)	11

The table below highlights the top locations (10 offences or more) of where the offences are occurring:

Locations	Count
Wardwick (507)	28
Blue Note Club Ltd, 14a Sadler Gate	23
Victoria Street (506), 2 to 12	22
Tesco Metro, 7-11 St Peters Street	22
Colyear Street (507), Nightclub side	22
Curzon Street (507), all other properties	19
Victoria Street (508), 15 to 35	18
Syn, Colyear Street	18
Coyote Wild, Victoria Street	17
Sadler Gate (505), 1 to 30	16
Tiga/ Monroe's/ Fever, 7-11 Wardwick	15
St James Street	14
Friar Gate (514), all 27 to 102	14
Jimmys, 5 St James Street	13
Sadler Gate (506), 31 to 55	12
Market Place (506), all 1 to 13	12
Morledge (503)	11
Becket Street (507)	10

It can be clearly inferred from the above analysis that alcohol is a main factor within the City Centre area for ASB and crimes, in particular violent crime. It is therefore appropriate that all steps are taken to ensure that alcohol is sold responsibly whether from a premises licensed for 'The sale by retail of alcohol for consumption ON and

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OFF the premises' or for 'The sale by retail of alcohol for consumption OFF the premises'.

The Derby City Anti-Social Behaviour Manager is concerned that the increasing number of off-licences is adversely affecting crime, public safety and increasing complaints of anti-social behaviour for street drinking. A copy of his full letter is attached as Appendix 2.

Street drinking is a seasonal problem which in his opinion is worsening. ASB referrals received for street drinking from April - June 2009 compared to April - June 2011 have risen from 50 to 214 incidents. An increase of 328% in two years.

In 2010 there were about 20 hardcore street drinkers across the city who refused to engage in services, caused problems on a daily basis and of which a number received Anti Social Behaviour Orders. A combination of service providers has targeted these drinkers and their negative impact has been very much curtailed. The nature of street drinking has recently changed in a very short space of time requiring an alternative approach. Between December 2010 and June 2011, a total of 252 ASB referrals for street drinking involving 176 different individuals were made. 48% of the referrals were also in receipt of drug treatment services.

The number of referrals does not automatically mean there are 176 prolific street drinkers, but it highlights the growing trend to consume alcohol on the streets of Derby by a wider group of people. The most significant source of this alcohol is purchased from off-licenses. The hotspot areas of Friargate, Green Lane, Babington Lane and Beckett Street have off-licenses on those streets or in the immediate vicinity.

Practical experience of a generic street drinker is that there preference is not to buy their alcohol from a chain superstore but from a local trusted licensee within a short distance of their accommodation or public meeting place. It is then the norm for the same alcohol to be consumed in the street.

A letter is attached (Appendix 4) from the interim joint director of Public Health for NHS Derby City and Derby City Council quantifying the significant health problems within the City caused by excessive alcohol consumption.

Derby City has recently witnessed Premises Licences for two new off-licence establishments being granted despite the submission of numerous objections from a broad cross section of 'responsible' agencies and interested parties. Both premises were within a short walking distance of Milestone House that caters for people with addictions that include alcohol dependency. The Padley Centre and the Job Centre on Gower Street are also within walking distance of both premises. Centenary House (another 'alcohol dependency centre') is also located nearby. Both premises are either resided in or frequented by the local street drinkers and rough sleepers.

Evidence does exist that Street Drinkers purchase their alcohol from the small Off Licences within the City Centre but not necessarily committing any offences. Licensing offences are only committed should they breach a pre existing specific licensing condition or when attempting to purchase alcohol whilst drunk. What is 'drunk' tends to be a very subjective test. Is there a correlation between the increases of ASB referrals received for Street Drinkers to the increasing concentration of Off Licences within the City Centre? No research has actually been performed in this

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Derby is not unique that begging can provide a ready source of income for Street Drinkers, who in turn then purchase their alcohol from the many Off Licences within the immediate vicinity. Careful consideration needs to be given in respect of what image do we really want to present of our City Centre? I further question how would the current situation fair on an assessment for a potential Purple Flag award?

Derby City Centre Night Time Economy (NTE) CIP Area

The proposed City Centre CIP Area totals 90.3 hectares, which represents 1.2% of the total area of the City. The total number of premises that hold Derby City Premises Licences for the sale by retail of alcohol for consumption OFF the premises within the same proposed CIP is demonstrated on the attached map as Appendix 1.

The map includes premises that may not immediately be identified as an Off Licence but hold such a premises licences should their core business change and they wish to operate as such. This presents a real risk if there was no conditions present on the current licence that prevents the sale of alcohol unless it is ancillary to their current core business. The actual number of Off Licences within the proposed inner ring road, only represents 6% of the total number of licensed premises within Derby City Council boundaries.

Examples of the inclusions of Off Licences within a CIP around the Country

The National Guidance under the Licensing Act suggests that Local Authorities can, within a cumulative impact area, adopt a policy of refusing all new licences subject to relevant representations being made. The following Local Authorities have confirmed that they have already adopted a special policy that includes Off Licence for the same reason that Derby City experiences:

- Brighton,
- Blackpool
- Royal Borough of Kingston on Thames
- Camden,
- Westminster,
- Lambeth
- Shepard's Bush,
- Ealing
- Cambridge,
- Hereford
- Aldershot
- Wigston, Leicester
- Leicester City Centre,
- Bournemouth
- Torbay

It is interesting to note that Brighton & Hoves' Cumulative Impact policy was tested in July 2011 when Sainsbury's appealed against the Local Authority who refused a new off-licence application in the heart of the Cumulative Impact policy. The appeal with Council's Council representing Sainsbury and Brighton & Hove City Council was

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drinking, proxy purchasing, dispersal issues, preloading and excessive drinking and related disorder".

Witnesses, Police, Councillors, and local residents gave evidence including the local A & E Consultant who presented his evidence along the lines of protecting children from harm. The Magistrates dismissed the appeal and the premises remain unlicensed. The Council were awarded £25k costs. The same store is currently their only premise without a licence in the Country.

The proposed policy including Off Licences

Any new applications for premises seeking 'The sale by retail of alcohol for consumption OFF the premises' (Off Licences) will only be granted where it is demonstrated that they will not add to cumulative impact and that they will comply with the other provisions of Derby City licensing policy. Where such compliance is demonstrated, as a minimum standard to support the four licensing objectives, suggested licensing conditions are attached at Appendix 3. Crime statistics demonstrate that Night Time crime levels significantly increase. Therefore, the policy is recommended to refuse applications involving such sales beyond 10pm.

Recommendation

Where a significant number of licensed premises - whether selling alcohol for consumption on or off the premises – are concentrated in any area, this can undermine the four licensing objectives. This cumulative impact has the potential to create dispersal problems as large numbers of people leave clubs, pubs and other late night venue establishments at the same time in the same immediate area. Off Licences generally sell cheaper alcohol than Public Houses and can supply alcohol to any individuals walking between licensed premises, waiting at a taxi, bus queue, or at a Late Night Refreshment take away. All of the aforementioned are vulnerable as flash points for public disorder and violence.

Off licences can heighten the risk of street drinking, proxy purchasing, dispersal issues, 'pre-loading' and excessive drinking and related incidents of crime and disorder in any City Centre. It is therefore recommended that Derby City Council adopt a cumulative impact policy for the City Centre that includes Off Licences.



Inspector Stephen Fairbrother
Derby Division Police Licensing Enforcement

Appendix 2

Derby City & Neighbourhood Partnerships
3rd Floor, St Peter's House
Gower Street
Derby, DE1 1SB

FAO Insp. S Fairbrother
Licensing
Derbyshire Police Constabulary
St. Mary's Wharf Police Station
Derby

Our Reference

Date
9th August 2011

Contact
Craig Keen

email
craig.keen@derby.gov.uk

Telephone *Fax*
01332 256840 01332 256928

Dear Inspector Fairbrother

Re: Cumulative Impact Zone – Off Licences

I am representing Derby City & Neighbourhood Partnerships and would formally like to comment as an 'interested party' to the inclusion of off-licence premises as part of the Cumulative Impact Zone (CIZ) currently under consideration.

I am the lead officer responsible for reducing complaints of anti-social behaviour for Derby City Council. One of the most regular complaints received by the anti-social behaviour team is in relation to street drinking with particular hotspots located on Friargate, Becket Street, Green Lane and Babington Lane areas.

Let me be clear; in my opinion the increasing number of off-licences is adversely affecting crime, public safety and increasing complaints of anti-social behaviour for street drinking. I've made several appearances at Licensing Committee hearings to make this point. Street drinking is a seasonal problem and the problem is getting shockingly worse. ASB referrals received for street drinking from April - June 2009 compared to April - June 2011 have risen from 50 to 214 incidents.

services. This is not to say we now have 176 prolific street drinkers, but it highlights the growing trend to consume alcohol on the streets of Derby by a wider group of people. Undoubtedly, and I cannot say this strongly enough, the most significant source of this alcohol is purchased from off-licenses.

It should not come of any surprise or be regarded as coincidence the hotspot areas of Friargate, Green Lane, Babington Lane and Beckett Street have off-licenses on those streets or in the immediate vicinity.

Again, let's be clear; a typical street drinker's preference is not to buy their alcohol from a Tesco's or Asda but from a local trusted licensee within a short distance of their accommodation or public meeting place. It is the norm for this alcohol to be consumed in the street.

A lack of funds to purchase this much need alcohol is also the catalyst for begging in the city centre to which the Police have responded with special Operations. In the early evening I've witnessed young people coming into the city, getting off buses at the new bus station and heading straight to the Spar shop. Here they formed an orderly queue to purchase alcohol which was then consumed on the streets in the city centre on the way to the venue of their choice.

The density of licensed premises in Derby city centre places the city fifth in the UK behind London, Newcastle, Nottingham and Leeds. I question the need for additional sources of alcohol from off-licenses and other outlets in such a limited geographical area. The introduction of a CIZ tests alleged need typically promoted by breweries and retailers.

Much has been done in partnership with the police and others to combat increased complaints of anti-social street drinking, such as the installation of mobile CCTV in hotspot locations resulting in numerous arrests. However, we should be focused on prevention rather than reaction to the problem once it manifests itself on our streets.

Many of the business on Green Lane have had their security improved to help reduce the increased fear of crime. Typically, this has included the installation

Appendix 3

CONDITIONS RELATING TO THE PREVENTION OF CRIME AND DISORDER

1. The Designated Premises Supervisor (DPS) will, within 3 months of the date of this decision, attain a qualification, namely, either the BIIAB National Certificate or the CPL qualification for Designated Premises Supervisors (a specialised course for DPS's which the Sub-Committee considers to be necessary and proportionate to impose, taking account of the unique issues arising within the area of the premises);
2. The Premises Licence Holder (PLH) and DPS shall ensure that a minimum of one person who possesses a personal licence is present on the premises whenever they are open for licensable activities;
3. Alcohol shall not be sold in single units, save for wines and spirits. For the avoidance of doubt, no sale or supply of individual cans or bottles of alcohol shall be made from the premises;
4. Save for wines and spirits, no alcohol sold or supplied from the premises shall contain an alcohol by volume (ABV) rating equal or greater than 5.7%;
5. Alcohol spirits shall be located and sold only from behind the counter.
6. Training shall be provided to all staff involved in the sale of alcohol. Initial training shall be provided upon commencement of employment, such training to include details of the law relating to the sale of alcohol, and any in-house systems or procedures that staff are required to adhere to. Refresher training shall be provided at regular intervals, or as appropriate, and in any event at least once every six months. Written records detailing the extent of training provision for each individual member of staff shall be retained on the premises for a minimum of one year and shall be produced on request to a police constable or other authorised person, as defined within section 13 of the Licensing Act 2003.
7. A DPS shall ensure that all staff involved in the sale of alcohol are provided with

10. All refusals of sales on alcohol shall be recorded in a refusals book/register. The register shall, as minimum measures, record the date and time of refusal, as well as provide details of the nature of the refusal, and the name of the point of sale personnel who refused the sale. The register shall be retained for a period of one year from the date of the last entry. The refusals book/register shall be produced on request to a police constable or other authorised person, as defined within section 13 of the Licensing Act 2003.
11. At least once a week, the DPS or other authorised personnel shall;
 - Examine the record and compare any changing refusals patterns on a weekly basis, including any patterns that may be unique to individual point of sale personnel
 - Indicate in writing any action taken in relation to the examination
 - Sign off/endorse the record to indicate that the two preceding bullet point measures have been undertaken
12. A digital CCTV recording system shall be installed on the premises. The system shall be kept secure, to be accessed only by the PLH or other specifically designated member of staff.
13. All authorisations for the purposes of paragraphs 11 and 12 must be in writing and shall be retained on the premises at all times, and shall be produced on request to a police constable or other authorised person, as defined within section 13 of the Licensing Act 2003.
14. The CCTV system installed at the premises shall be positioned so as to secure sufficient coverage over all internal and external parts of the premises to which the public have access. The system installed shall also be capable of enabling the premises' personnel to monitor the premises both internally and externally by way of a monitor strategically positioned inside the premises.
15. The CCTV system installed at the premises must be operational at all times when the premises are open for licensable activities. It must be maintained in

the retrieval, if a cost is incurred, will be met between the agencies requiring the image).

18. All digital recordings shall be made in real time i.e. no time lapse recordings shall be made.
19. The DPS will take steps to secure that groups of people do not congregate outside the premises to the annoyance of the general public. Any such steps will be recorded in a 'Condition 10 Register'. The register shall be produced on request to a police constable or other authorised person, as defined within section 13 of the Licensing Act 2003.
20. As far as practicable, all alcoholic stock shall be marked so as to be identifiable from the Store in question.

CONDITIONS RELATING TO THE PROTECTION OF CHILDREN FROM HARM

21. A 'Challenge 25' age policy in relation to the sale and/or supply of alcohol shall be applied to the premises.
22. A refusals book will be operated at the point of sale in accordance with paragraph 10.

Appendix 4



NHS Derby City and NHS Derbyshire County

FAO Stephen Fairbrother
Inspector – Licensing and Operational Support
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22 August 2011

Dear Inspector Fairbrother

Re: Application to Operate Off Licences within the Inner Ring Road

The proximity of the applicant's premises is of particular concern because only yards away there is a homeless people's hostel (Padley Centre).

Milestone House is another homeless people provision which is located in Green Lane, Derby, which again would only be a matter of a few hundred yards from the applicant's premises. Milestone House houses a significant number of service users with alcohol and drug related issues.

The granting of this licence in what is an already highly saturated area in terms of access to alcohol, would potentially contribute to the rising number of alcohol related assaults, public nuisance and a significant amount of alcohol related health and well-being issues.

Should you require further clarification re the comments expressed I can be contacted at the above address.

Yours sincerely



