



City of
Stoke-on-Trent

Licensing Act 2003

Cumulative Impact Assessment for the City Centre

2021 - 2024

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Review: as required or every three years

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	Introduction
	The concept of 'cumulative impact' has been used by licensing authorities within their statements of licensing policy since the commencement of the 2003 Licensing Act. 'Cumulative impact assessments' were introduced in the 2003 Act by the Policing and Crime Act 2017, with effect from 06 April 2018. Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area.
	Cumulative Impact Assessment
	In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak time or when queuing at fast food outlets or for public transport.
	Queuing in itself may lead to conflict, disorder and anti-social behaviour. Moreover, large concentrations of people may also attract criminal activities such as drug dealing, pick pocketing and street robbery. Local services such as public transport, public lavatory provision and street cleaning may not be able to meet the demand posed by such concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport.
	A cumulative impact assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence 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. Cumulative impact assessments 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.
	Legal Requirements
	In carrying out its duties under the Licensing Act 2003 Stoke on Trent City Council has a duty to promote the four licensing objectives, namely: <ul style="list-style-type: none"> • The Prevention of crime and disorder • Public safety • The prevention of public nuisance • The protection of children from harm
	One of the Council's key objectives is to seek a reduction in crime and disorder throughout Stoke-on-Trent, consistent with its statutory duty under section 17 of the Crime and Disorder Act 1998, and an improvement in local amenity through the reduction of anti-social behaviour.
	The Council will also pay due regard to the Guidance issued under Section 182 of the Licensing Act 2003.

	Reasons for Cumulative Impact Assessment
	The Council considers that the number of premises licenses and/or club premises certificates in Hanley City Centre and Burslem town centre is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.
	In 2013 a task and finish group examined the night time economy in the city centre and observed the effect the concentration of licensed premises in that area were having on the licensing objectives. At the conclusion of their work they recommended that the council ' <i>consult formally on adopting a Cumulative Impact Policy (CIP) for the city centre</i> '.
	In November 2013, Cabinet considered the task and finish recommendations and agreed that consultation upon a CIP should be conducted. They commented that ' <i>This will assist to restrict future licences in areas of the city centre where there is a concentration of bars. It will also assist and encourage different night time businesses to set up in the city centre to diversity the offer to satisfy unfilled demand among families and more mature age groups</i> '.
	As a result of the above, the Statement of licensing policy that was adopted on 01 November 2014, effective from 01 January 2015, included a cumulative impact area for the City Centre.
	The City Centre has remained a cumulative impact area since 2015.
	The Council is aware of the link between an increase in licensed premises within the city centre and the potential for violent crimes and anti-social behaviour.
	As a consequence of the number of late-night premises within the city centre, the Council and Staffordshire Police have adopted many special measures to deal with any resulting crime and anti-social behaviour. These have included additional police resources at times of peak demand, supporting a street pastor's scheme, and playing an active role in supporting a business led Nightlife Partnership aimed at reducing crime.

	Evidence
	<p>Staffordshire Police have requested that we retain the cumulative impact area for the City Centre.</p> <p>Sgt 4594, Philip Fearn has submitted the figures attached as Appendix 2, and would point out that Covid-19 has affected the environment for licensed premises.</p> <p>Sgt James Finn from the Licensing Unit at Staffordshire Police has submitted the below:</p> <p>The provision of the Cumulative Impact Policy for the areas of Hanley & Burslem Town Centres (subsequently changing to Cumulative Impact Assessments if retained) have been relied upon when relevant to prevent a further rise in crime and disorder in the late night economy in relation to licensed premises. Of note this has only been used when relevant and has not been utilised to prevent economic growth within the town. All applications are assessed on their own merits and there have been a number of licensed premises, for example, in the Piccadilly area of Hanley Town Centre, which through engagement with the applicant have been granted a Premises Licence without the need for a hearing following Police representations. These businesses continue to flourish largely with no calls for service to the Police.</p> <p>A crucial element to these new businesses, which largely have a terminal hour of midnight, offer a different product than traditional late night economy including the provision of food. This is a completely different business model than the late night economy with vertical drinking, no food provision and a customer base largely of 18-25 year olds.</p> <p>It is these late night venues which largely contribute to town centre violence, the number of which have reduced to what it was historically, however, it was Trinity St when Hanley Town Centre was last assessed as the most violent street in Staffordshire. The reason this assessment was made was on receipt of an application for an already existing licensed premises with a terminal hour of 0300hrs for licensable activity and 0330hrs for opening to the public that wished to extend its hours.</p> <p>This premises was already suffering from incidents of violence and a lack of compliance with conditions attached to the operating schedule of the Premises Licence, and was subsequently objected to by the Police and the application was refused at a hearing before the licensing subcommittee.</p> <p>The above two examples show that through correct usage of the model and assessment of each application on its own merits that a balanced approach is shown by the Police allowing for both businesses to come to the town centre and flourish without impacting on the already existing issue of violence and disorder, and those which can be shown to have a detrimental impact are prevented when appropriate from further negatively contributing.</p>

Joe Holford, Senior Public Health Officer at Stoke-on-Trent City Council has submitted the following:

Alcohol is a causal factor in more than 60 medical conditions, including circulatory and digestive diseases, liver disease, a number of cancers and depression. Alcohol is the leading risk factor for ill-health, early mortality and disability among people aged 15-49 years in the UK. Alcohol-related harm falls disproportionately on families from lower socio-economic groups.

In support of the cumulative impact assessment the Joint Strategic Needs Assessment 2020 for Stoke-on-Trent highlights the detrimental impact of alcohol use has on our communities. Binge drinking can lead to injuries, anti-social behaviour and other harm to communities. Alcohol misuse also causes losses to business and the local economy through absenteeism, poor performance and workplace accidents. Alcohol also causes harm to others. It is associated with family and relationship problems, and is a significant contributory factor in offences of violence and disorder including domestic violence.

Latest data from the Local Alcohol Profiles for England show that (when compared with England) Stoke-on-Trent had significantly higher levels of the following:

- All age alcohol-related mortality (2018)
- All age alcohol-specific mortality (2016-18)
- All age mortality from chronic liver disease (2016-18)
- All age hospital admissions for alcohol-specific conditions (2018/19)
- All age hospital admissions for alcohol-related conditions (2018/19)
- Admissions for alcohol-related conditions - ages 40-64, 65 and over (2018/19)
- Admissions to hospital due to alcohol for a range of conditions such as circulatory disease, mental and behavioural disorders, and intentional self-poisoning are all significantly higher locally.

In regards to monitoring the number of take away establishments in the town centres of Hanley & Burslem the JSNA further supports the cumulative impact assessment as is evidenced below with the local data.

Poor diet (and obesity) are the leading causes of premature death and mortality, and are associated with a wide range of diseases including circulatory disease and some cancers. The costs of diet-related chronic diseases to the NHS are considerable. Average intakes of saturated fat, sugar, and salt are above recommended levels, while intakes of oily fish, fibre and some vitamins and minerals remain below recommendations.

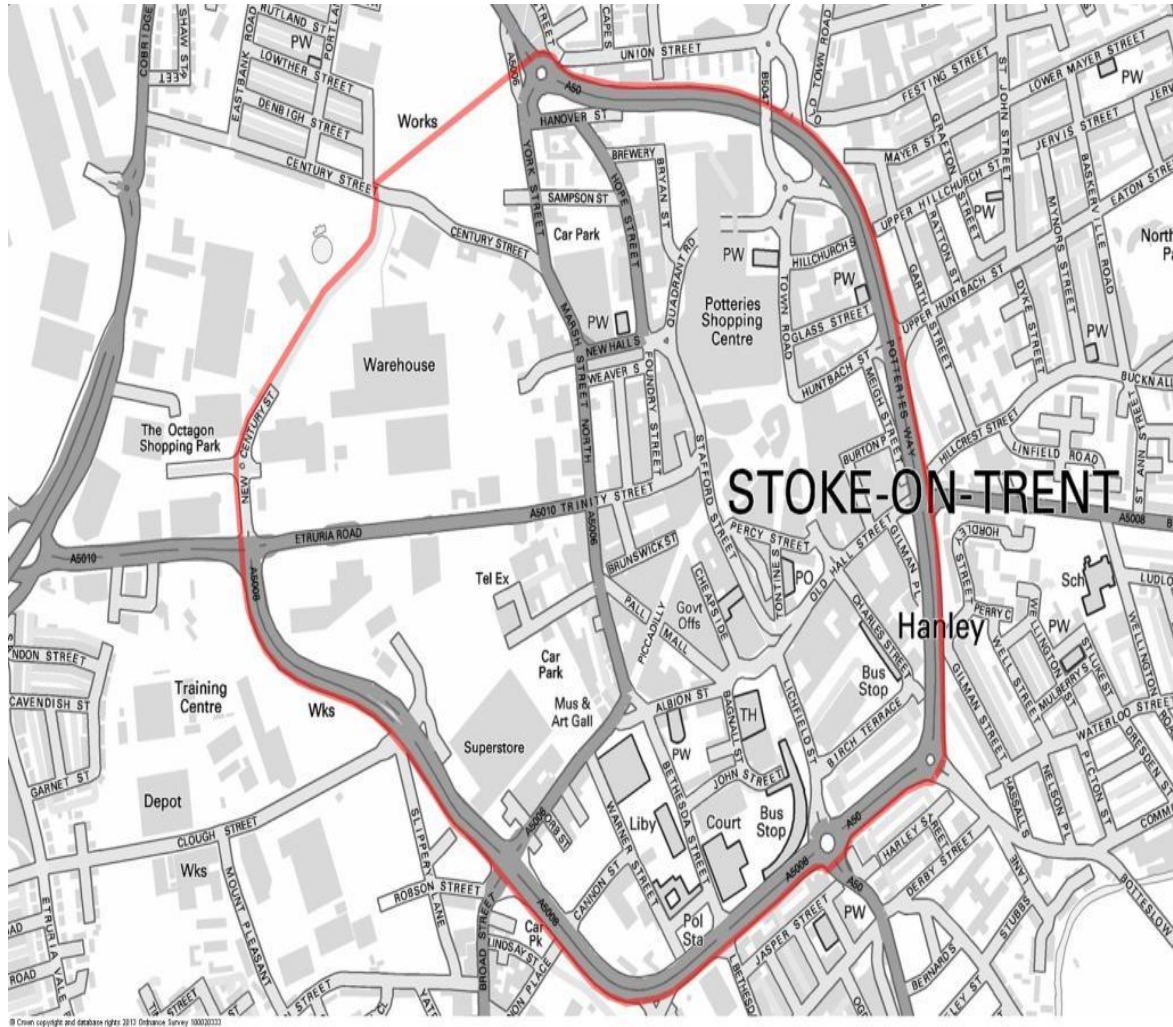
In 2019, 53.0% of food outlets in Stoke-on-Trent were classified as fast food outlets (compared with 37.5% in the UK).⁷⁵ Between 2010 and 2019, the average number of fast food outlets across the city increased from 48.5 (per 100,000) to 68.4.

Data from the Active Lives Survey found that just under half (48.5%) of adults aged 16 and over reported that they had eaten the recommended five portions of fruit and vegetables (on a usual day) in Stoke-on-Trent in 2018/19.⁷⁶ This was lower than the England average of 54.6%.

	<p>This means locally that around 105,000 adults (aged 16 and over) are <i>not</i> eating the recommended five portions of fruit and vegetables on a daily basis in the city.</p> <p>Public Health would advise of the detrimental impact of any fast food take away establishment & new alcohol related premise applications in the community settings below:</p> <ul style="list-style-type: none"> • locations where children and young people congregate such as schools, community centres and playgrounds • areas with high levels of obesity, deprivation and general poor health
	Review
	The cumulative impact assessment will be subject to regular review as required and as a matter of course every three years.
	Consultation
	When reviewing the cumulative impact assessment, consultation, as laid out in the Licensing Act 2003 S5A (5) will be under taken. Details of all groups formally consulted are set out in Appendix 3.
	Summary
	The licensing authority is of the opinion that existing cumulative impact policy has promoted the diversity of the City Centre and as a direct result resulted in more food led, day time and early evening venues as opposed to late night vertical drinking establishments.
	<p>The policy will apply both to premises making new applications and existing premises applying to vary their existing licence.</p> <p>It will cover all premises licences, including those for the sale of alcohol off the premises and late night refreshment.</p>
	Areas covered by Cumulative Impact Assessment
	The area covered by the cumulative impact assessment for the City Centre is detailed in the map contained at Appendix 1.

Cumulative Impact Area

Appendix 1 – City Centre – area inside red boundary line



Appendix 2 – Staffordshire Police Figures

Daytime – Hanley Town Centre, data submitted 04 September 2020.

Incident Description	Last 12 months - Last Year	Last 12 months - This Year	% change	YTD - Last Year	YTD - This Year	% change	Last 3 months - Last Year	Last 3 months - This Year	% change	Last 30 Days
Violence/Harassment	192	175	-9%	74	45	-39%	46	35	-24%	13
Public Order	41	44	7%	19	22	16%	10	19	90%	6
Rape/Sexual Offences	43	20	-53%	18	6	-67%	9	4	-56%	1
Robbery	21	17	-19%	11	6	-45%	5	3	-40%	1
Domestic/Family Incident	59	56	-5%	23	14	-39%	16	8	-50%	5
ASB	564	362	-36%	213	124	-42%	129	68	-47%	20
Criminal Damage	Copy 36	40	11%	14	12	-14%	8	9	13%	5
Drugs Info/Supply/Poss/Other	30	7	-77%	4	1	-75%	2	1	-50%	1
Vehicle Crime	16		-100%	2		-100%				
Other Incident	2,893	1,926	-33%	1,179	572	-51%	699	397	-43%	136
Total Incidents	3,895	2,647	-32%	1,557	802	-48%	924	544	-41%	188

Night Time – Hanley Town Centre, data submitted 04 September 2020.

Incident Description	Last 12 months - Last Year	Last 12 months - This Year	% change	YTD - Last Year	YTD - This Year	% change	Last 3 months - Last Year	Last 3 months - This Year	% change	Last 30 Days
Violence/Harassment	252	145	-42%	110	28	-75%	61	24	-61%	11
Public Order	60	51	-15%	19	13	-32%	13	10	-23%	4
Rape/Sexual Offences	26	20	-23%	12	4	-67%	8	4	-50%	2
Robbery	11	10	-9%	3	3	0%	2	2	0%	1
Domestic/Family Incident	40	26	-35%	19	9	-53%	13	6	-54%	4
ASB	251	161	-36%	87	34	-61%	52	17	-67%	10
Criminal Damage	Copy 16	15	-6%	4	5	25%	2	4	100%	1
Drugs Info/Supply/Poss/Other	22	5	-77%	3	1	-67%	2	1	-50%	1
Vehicle Crime	5		-100%							
Other Incident	823	600	-27%	322	186	-42%	205	128	-38%	54
Total Incidents	1,506	1,033	-31%	579	283	-51%	358	196	-45%	88

Appendix 3: Consultation

- Staffordshire Police Licensing, Early Intervention & Prevention Unit, Staffordshire Police Headquarters, Block 9, Ground Floor, Weston Road, Staffordshire, ST18 0YY
- Staffordshire Fire and Rescue Service (Licence Applications), Lower Bethesda Street, Hanley, Stoke-on-Trent, ST1 3RP.
- Head of Child Protection (Licence Applications), Stoke on Trent City Council, Floor 2, Civic Centre, Glebe Street, Stoke on Trent, ST4 1HH
- Lead Officer (Trading Standards), Public Protection, Hanley Town Hall, Albion Street, Hanley, Stoke-on-Trent, ST1 1QL.
- Lead Officer (Environmental Health), Public Protection, Hanley Town Hall, Albion Street, Hanley, Stoke-on-Trent, ST1 1QL.
- Planning, (Licence Applications), Stoke-on-Trent City Council, 3rd Floor, Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH.
- Directorate of Public Health, Stoke-on-Trent City Council, Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH
- Lead Officer (Health and Safety), Public Protection, Hanley Town Hall, Albion Street, Hanley, Stoke-on-Trent, ST1 1QL.
- Alcohol Licensing Team, Home Office, Lunar House, 40 Wellesley Road, Croydon, Croydon, CR9 2BY.