



Licensing Act 2003

Cumulative Impact Assessment for the City Centre

2025-2028

Published:

Review:

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	Introduction
	<p>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.</p>
	Cumulative Impact Assessment
	<p>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.</p>
	<p>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.</p>
	<p>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.</p>
	Legal Requirements
	<p>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:</p> <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
	<p>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.</p>
	<p>The Council will also pay due regard to the current version of the Guidance issued under Section 182 of the Licensing Act 2003 by the Home Office.</p>

	Reasons for Cumulative Impact Assessment
	The Council considers that the number of premises licenses and/or club premises certificates in Hanley City 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 'consult formally on adopting a Cumulative Impact Policy (CIP) for the city centre'.
	In November 2013, Cabinet considered the task and finish recommendations and agreed that consultation upon a CIP should be conducted. They commented that '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'.
	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 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>PS 413, Jim Finn has submitted the figures attached as Appendix 2.</p> <p>Sgt James Finn from the Licensing Unit at Staffordshire Police has submitted the below:</p> <p>Hanley Town Centre is the focal hub for some daytime (retail) and most night-time economy within the wider city of Stoke on Trent. The area is made up of several different ward areas within the City which encircle the town centre, these being Burslem, Middleport, Northwood, Shelton, Sneyd Green The night time economy in the Town Centre attracts visitors, not only from within the City but also from North Staffordshire (Newcastle and the Moorlands) and Longton, Fenton and sometimes as far south as Stone. There are several good transport links to other towns nearby all of which contribute to the night time economy.</p> <p>Whilst there are licenced premises elsewhere in the City, it is the Town Centre which is by far the busiest area and contributes significantly more to the associated crime and disorder than anywhere else in terms of disorder, violence, VAWG and drugs.</p> <p>For the most part crime and disorder attributed to the night time economy takes place as bordered by the Hanley ring road, A50 / A5008 / Hasselle St / Century St and the A5006 (Please see map below).</p> <p>There are currently 126 licensed premises in Hanley Town Centre made up of 83 on licence premises, 16 off licence premises and 27 late night refreshment premises. This gives a varied mix of businesses involved within both the daytime and night time economy. The venues close between 2300 – 0400hrs but many utilise temporary event notices (TENS to extend their licence, sometimes until as late / early as 0600hrs).</p> <p>It is observed through discussion with premise managers that licensed premises will employ discretion and close earlier than their normal licensing hours where it is financially advantageous for them to do so.</p> <p>Friday and Saturday nights traditionally see the most patrons attending the town with average numbers beginning to increase steadily from 6pm and peaking around 2230 - 2300hrs.</p> <p>Venues that close between 0200 – 0300hrs will see exiting patrons often gathered in number on Trinity St, Stafford and Brunswick St</p> <p>Representations have been made via the support of Staffordshire Police Licensing Team in recent years to a number of Premise Licence Holders, and Designated Premise Supervisors (DPS) relating to poor license observations, drunkenness of patrons, drug possession / supply, violence and related criminality.</p>

It is anticipated that in the wake of a POST-COVID19 environment that an increase for later trading hours for alcohol licensing will be applied for by both existing and new businesses. Such applications would be subject to very close scrutiny and liaison with Staffordshire Police Licensing and Local Authority Licensing teams.

Public / Private Transport

With the support of the local authority, both private hire and hackney carriage services are pooled at an appropriate regulated location, however there is also an accumulation to unofficial parking on Hope St, outside Gossip nightclub as it is the norm that a high number of the late revellers will finish their night at this location.

Daytime provisions operate within agreed bus routes, and taxi ranks

Policing

Night time economy is policed using a bespoke “Safer Nights” operation. This runs from 1800hrs – 0300hrs every Saturday and Sunday evening and is supported by both Response and Neighbourhood shifts where appropriate. There is a Sgt allocated to the Operation each night.

The aims of the operation are as follows:

- The overall intention of Operation Safer Nights is to provide a safe environment for all to lawfully enjoy Hanley Town Centre’s night time economy.
- Identify vulnerable persons and safeguard them through engagement and advice.
- Identify predatory behaviour by potential perpetrators and prevent offences through early positive interventions.
- Proactively support and enforce licensing objectives for licensed premises.
- Support partner agencies with coordinated activities.
- Gather information and intelligence to support future operations
- Proactive policing of the town centre delivering early intervention measures to prevent offences and robustly deal with any person committing any offence.

A sec 34 authority is authorised for each weekend and tends to run alongside the Operation hours unless there is further intel / information to suggest it should be extended (Christmas / New Year’s Eve etc).

CCTV

The majority of local businesses operate their own private and independent CCTV systems in addition to a Local Authority owned system of CCTV cameras. The provision of a downlink and viewing of that Local Authority CCTV is made available to Officers 24 hours a day for investigative purposes.

Crime and antisocial behaviour

The data in the following tables have been sourced from the officially reported incidents. This data is a useful indicator of the frequency and volume of incidents and the impact that the night time economy has on the local community.

The data shows the figures for the City Centre area which is the closest we can get to accurate data for the Town Centre but sometimes shows crime and disorder slightly more widely than just the area within the ring road.

CRIME	July – Dec 2022	Jan – Jun 2023	July – Dec 2023	+ / - In the last 6 months	+ / - % In the last 6 months
VIOLENCE	261	254	317	+63	+19%
ROBBERY	15	24	32	+8	+25%
SEXUAL OFFENCES	69	49	46	-3	-6%
PUBLIC ORDER	150	193	264	+71	+27%
CRIMINAL DAMAGE	83	74	104	+30	+29%
DRUGS CRIME	14	23	45	+22	+49%

ASB	July – Dec 2022	Jan – Jun 2023	July – Dec 2023	+ / - In the last 6 months	+ / - % In the last 6 months
E1, E2, E3	326	247	295	+48	+16%

In the most recent 6-month period the Town Centre has experienced a sharp increase of all crime types and antisocial behaviour (with the exception of sexual offences).

The following table provides data relating to total incidents in the SCB* area (Hanley Town Centre) over the last year. It indicates not only a high number of incidents such a specific area but also shows the seasonal increases.

Jan	529
Feb	530
March	586
April	626
May	677
June	692
July	750+ (STORM won't display more than 750 incidents and manual record
Aug	750+ searching would be required).
Sept	750+
Oct	750+
Nov	750+
Dec	750+

This shows a significant increase from Jan – Dec in terms of both incident numbers and crime (as per the previous table).

CONCERNS

There is a consistent theme of crime and antisocial behaviour impacting on both the daytime and night time economy.

Figures show an increase in all crime types associated with the night time economy, including violence, public order, but with the exception of sexual offences. This may well be due to some of the excellent work being done with regard to VAWG.

The local policing team is engaged in weekly collaborative Safer Nights policing operations which involves, as well as public and business engagement, high visibility patrolling and positive action approach to arresting perpetrators, which is a labour-intensive approach to reducing crime and disorder.

CONCLUSION

As part of a wider approach to tackling the causes of the crime and disorder, it is recommended that the Cumulative Impact Assessment policy is maintained in Hanley.

New businesses are warmly welcomed by the local policing team and will be afforded equal levels of support and intervention where needed to tackle crime and disorder. However, it is considered appropriate that those new business that are likely to contribute to crime and disorder are scrutinised in line with this legislation to ensure that the correct steps are taken to prevent a further rise in crime within the City Centre.

Public Health state that 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 a 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 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 OHID show that (when compared with England) Stoke-on-Trent had statistically higher levels of the following:

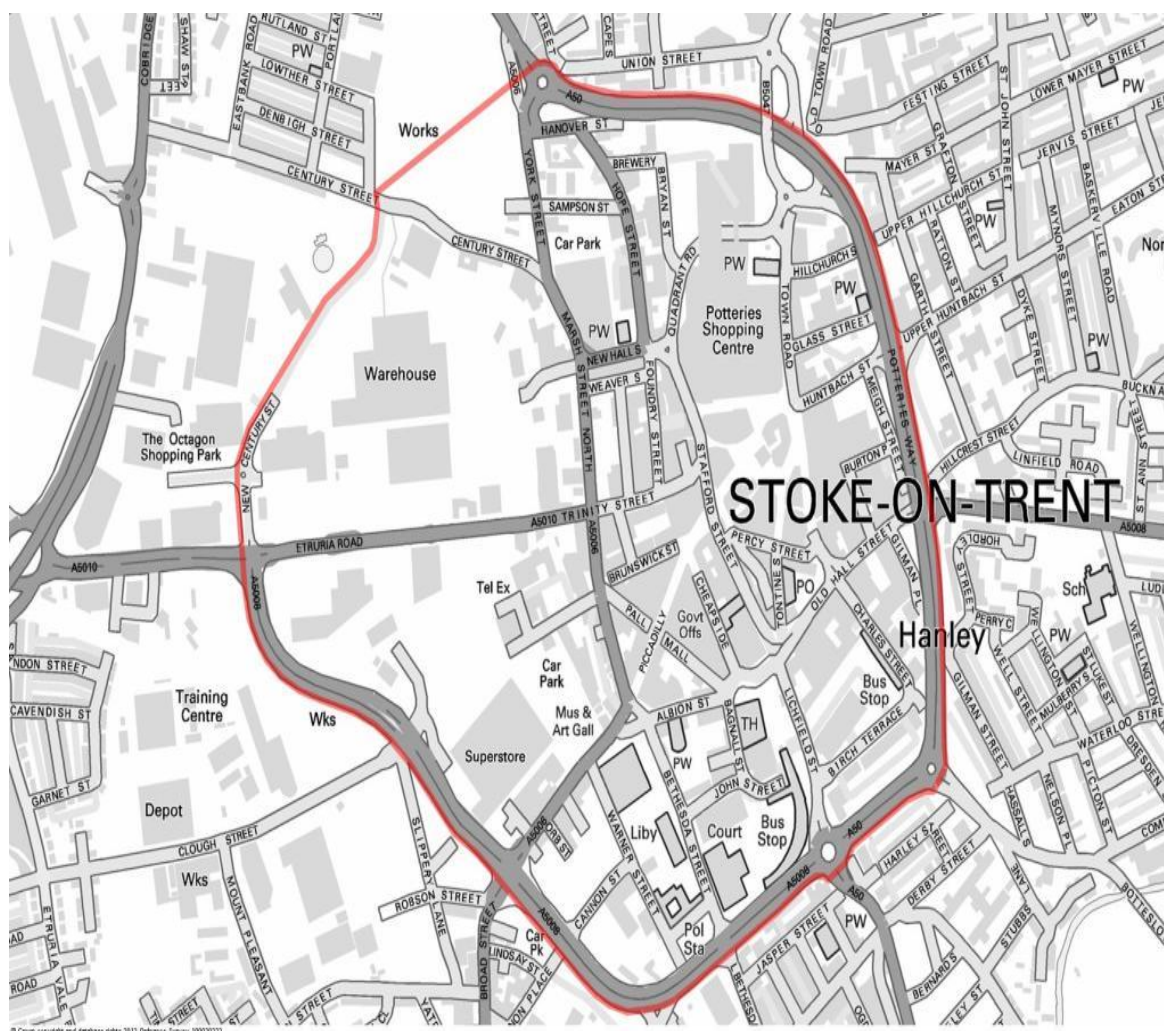
- All age alcohol-related mortality – ranked 25th out of 153 upper tier local authorities (2023)
- Alcohol-specific mortality – ranked 11th out of 153 upper tier local authorities (2023)
- All age mortality from chronic liver disease – ranked 21st out of 153 upper tier local authorities (2023)
- All age hospital admissions for alcohol-specific conditions – ranked 39th out of 153 upper tier local authorities (2023/24)
- All age hospital admissions for alcohol-related conditions – ranked 2nd out of 153 upper tier local authorities (2023/24)

	<ul style="list-style-type: none"> Admission episodes for mental and behavioural disorders due to use of alcohol – ranked 17th out of 153 upper tier local authorities (2023/24) <p>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.</p> <p>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.</p> <p>In 2024, there were 142.5 per 100,000 fast food outlets in Stoke-on-Trent (compared with 115.9 per 100,000 in the UK).</p> <p>Data from the Active Lives Survey found that just over a fifth (22.2%) of adults aged 16 and over reported that they had eaten the recommended five portions of fruit and vegetables in Stoke-on-Trent in 2022/23. This was lower than the England average of 31%.</p> <p>This means locally that around 162,870 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 areas where there is already a high density of either establishments
	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 2.
	Summary
	<p>The licensing authority is of the opinion that existing cumulative impact policy has previously promoted the diversity of the City Centre and has resulted in more food led, day time and early evening venues as opposed to late night vertical drinking establishments.</p> <p>The last few years have been difficult for the City Centre, but we have seen some new premises opening in the last few months.</p>

	<p>The policy will apply both to premises making new applications and existing premises applying to vary their existing premises licence.</p> <p>It will cover all premises licences, including those for the sale of alcohol off the premises and late night refreshment.</p>
<p>Areas covered by Cumulative Impact Assessment</p>	
	<p>The area covered by the cumulative impact assessment for the City Centre is detailed in the map contained at Appendix 1.</p>

Cumulative Impact Area

Appendix 1: City Centre – area inside red boundary line



Appendix 2: Consultation

- Staffordshire Police Licensing.
- Staffordshire Fire and Rescue Service (Licence Applications).
- Head of Child Protection (Licence Applications).
- Lead Officer (Trading Standards).
- Lead Officer (Environmental Health),
- Planning, (Licence Applications).
- Directorate of Public Health.
- Lead Officer (Health and Safety).
- Alcohol Licensing Team, Home Office.
- All licensed premises in Hanley (as defined by the map)
- Nightlife Partnership