Brent Cumulative Impact Zone Review

This paper outlines proposals for the review of the Cumulative Impact Zones (CIZs) in the London Borough of Brent.

Introduction

Brent Council in line with many Licensing Authorities introduced a Cumulative Impact Policy for ten areas within the borough. That Policy formed part of its Statement of Licensing Policy.

The Cumulative Impact Policy was published in January 2020 and created a rebuttable presumption against granting off-licences premises licences for alcohol in those areas. Cumulative impact has been used as a term to describe the stress that a large number of licensed premises can have on crime and disorder, nuisance and the demand on local services. Guidance issued by the Secretary of State under section 182 of the Licensing Act 2003 describes cumulative impact as "…the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area."

It is often not that licensed premises on their own are operating in a way that is detrimental to the licensing objectives, but it is the accumulation of the premises and the people attending them that creates the increased problems and demands on services. Under the Licensing Act 2003 (the 'Act'), the London Borough of Brent recognises that a significant number and type of licensed premises in a particular area may lead to problems of crime, disorder and nuisance and notes that in accordance with the Home Office Statutory Guidance to the Act, the cumulative impact of such premises on the promotion of the licensing objectives is a proper matter for the Council to consider.

Under the Licensing Act 2003 the Licensing Authority (the Council) is required to publish a statement on licensing policy every 5 years. The Act has four licensing objectives:

- Prevention of Crime & Disorder
- Promotion of Public Safety
- Prevention of Nuisance
- Protection of Children from Harm

A policy must take into account any Cumulative Impact Assessment (CIA) published under section 5A of the Act. In the Act, cumulative impact is described as "**the potential impact on the promotion of licensing objectives of a significant number of licensed premises concentrated in one area**". A licensing authority can publish a CIA to help it limit the number or types of licence applications granted in areas where there is evidence demonstrating the number or density of licensed premises is having cumulative impact, circumstances which undermine the licensing objectives. In cumulative impact areas, there is a presumption that the licensing authority will refuse or impose limitations on applications which are likely to add to the cumulative impact unless the applicant can demonstrate that there will be no negative cumulative impact on the licensing objectives.

Within three years of the publication of its CIA, the Authority has a duty to consider if it remains of the opinion that it is likely that it would be inconsistent with the authority's duty to promote the licensing objectives to grant premises in the relevant areas.

If the Authority remains of the opinion that the number of off-licences with premises licences in the relevant areas is such that it is likely that it would be inconsistent with the authority's duty to promote the licensing objectives to grant any further premises licences, or variations

of those licences, in those areas then a revised CIA must be published and contain a statement to that effect.

If the authority is no longer of the opinion that it would be inconsistent with the authority's duty to promote the licensing objectives to grant any further premises licences in respect to off-licences in the relevant areas, then it should issue a statement to that effect.

The Licensing Authority must consult in the same way as it would for reviewing its Statement of Licensing Policy. Therefore, the Licensing Authority must consult those specified in section 5(3) of the Licensing 2003, and subject to the outcome of the consultation, include and publish details of the Cumulative Impact Assessments in their Statement of Licensing Policy. Those who must be consulted are:

a) the chief officer of police for the licensing authority's area,

b) the fire and rescue authority for that area, i.e. the Fire Brigade

c) The Council's Director of Public Health,

d) such persons as the licensing authority considers to be representative of holders of premises licences issued by that authority,

e) such persons as the licensing authority considers to be representative of holders of club premises certificates issued by that authority,

f) such persons as the licensing authority considers to be representative of holders of personal licences issued by that authority, and

g) such other persons as the licensing authority considers to be representative of businesses and residents in its area.

Research Approach

The aim of this assessment is to identify locations across the London Borough of Brent where there is an emerging and/or are likely to negatively impact the promotion of the licensing objectives.

A data-led approach has been adopted to offer a transparent, consistent and replicable approach to evaluating the prevalence and degree of cumulative impact. However this approach does come with limitations, such as:

- Intelligence requirements cannot be met by existing data sets (due to lack of access, availability or suitability)
- Data sets offer limited insights (lacking spatial, temporal or descriptive granularity)
- Data may be collected for other purposes, such as operational service delivery, and is not always amenable to more strategic analysis (e.g. offers only a partial view of service demand or capturing limited categories)
- At the time of developing this assessment the Metropolitan police are reviewing partnership access and currently limited access to data, so public data has had to be used in most instances. Main source has been crimemap software available online.

In order to identify and assess potential areas of cumulative impact across the whole borough we have used two key data sets from Anti Social Behaviour (ASB) related offences recorded to Brent and also public available police data.

The recording of alcohol related criminal behaviour is not consistently reported via the Metropolitan Police and therefore this has been included alongside 4 other key reporting types:

- Anti Social Behaviour
- Public Order offences
- Robbery
- Violence and Sexual offences.

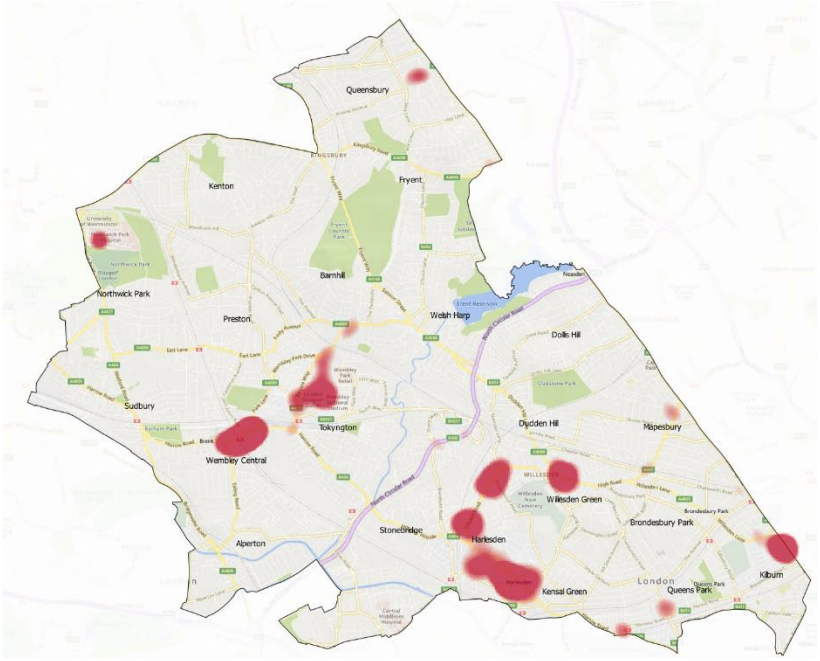
Additionally COVID has impacted on data with a reduction of recorded crime during the 'lockdown' periods of COVID restrictions, unless otherwise stated data used is between July 2019 and June 2022. This is to ensure a consistent approach and not a short period of time which may provide inconsistent approaches.

COVID restrictions reduced traditional street crime and this is reflected in both robbery and public order offences recorded over this period. Brent saw an overall reduction in all reported crime over the Covid 'lock down' periods.

London Borough of Brent

Every year the Safer Brent Partnership produces a Strategic Assessment which looks at all aspects of crime and community safety issues. The most recent assessment was developed in April 2022 for the calendar year of 2021, below are some of the key information around d overall crime:

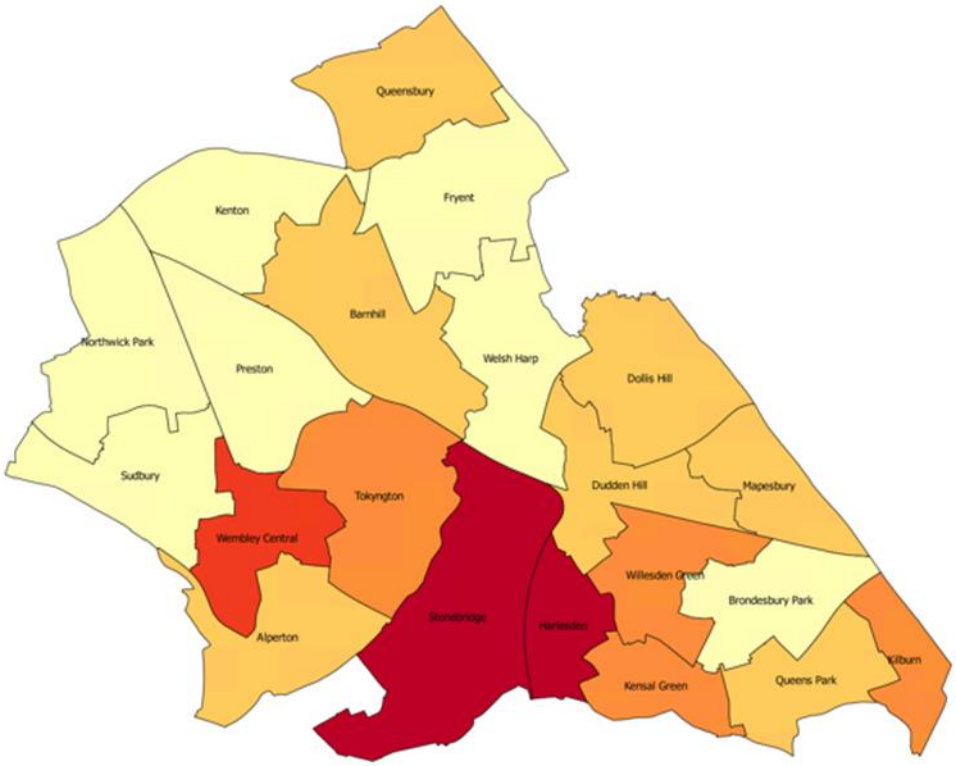
- Brent is among the top 20 safest Boroughs in London. The overall crime rate in 2021 was 82 crimes per 1000 people. This compares favourably to London's overall crime rate of 87 per 1000 residents
- Brent was one of 16 local authorities to record a reduction in Total Notifiable Offences (TNO) in 2021.
- This reduction is particularly marked in boroughs with significant night-time economies or tourist attractions and likely due to the COVID restrictions.
- Brent recorded a decrease of 2.3% in TNOs compared with 2019.
- Hotspot areas are largely unchanged from 2020 and for the last previous 3 years. The only significant change is that the areas immediately around Wembley Stadium and Arena are again a crime hotspot – this is due to the return of events after Covid restrictions were lifted.
- Hotspots are often reflective of areas that have high levels of gang activity and deprivation – this applies to South Kilburn and Harlesden.
- Other areas are crime hotpots due to high levels of footfall – Wembley High Road and Willesden High Road. The map below highlights this.



This can be further broken down by Ward by the total number of offences in each ward. The darker shade on the map highlights the high all crime reported.

TNO by Ward

Ward	TNO	% of total
Stonebridge	2627	9.5%
Harlesden	2253	8.1%
Wembley Central	1897	6.8%
Willesden Green	1612	5.8%
Tokyngton	1570	5.7%
Kensal Green	1505	5.4%
Kilburn	1500	5.4%
Dudden Hill	1384	5.0%
Mapesbury	1349	4.9%
Queensbury	1278	4.6%
Alperton	1166	4.2%
Barnhill	1145	4.1%
Queens Park	1131	4.1%
Dollis Hill	1111	4.0%
Welsh Harp	1032	3.7%
Preston	991	3.6%
Brondesbury Park	924	3.3%
Sudbury	874	3.2%
Northwick Park	868	3.1%
Fryent	839	3.0%
Kenton	656	2.4%



Similarly when comparing this with the available data where alcohol has been reported, noting that accuracy of police reporting is limited regarding alcohol related crime, there is a similarity between the top 6 Ward areas. There is a significant drop from 7 Ward onwards.

Any assessment and recommendation should ensure that a specific focus is given to these 6 ward areas as part of any CIZ review and proposal. Data provided in table below is from 01 July 2021 – 30 June 2022.

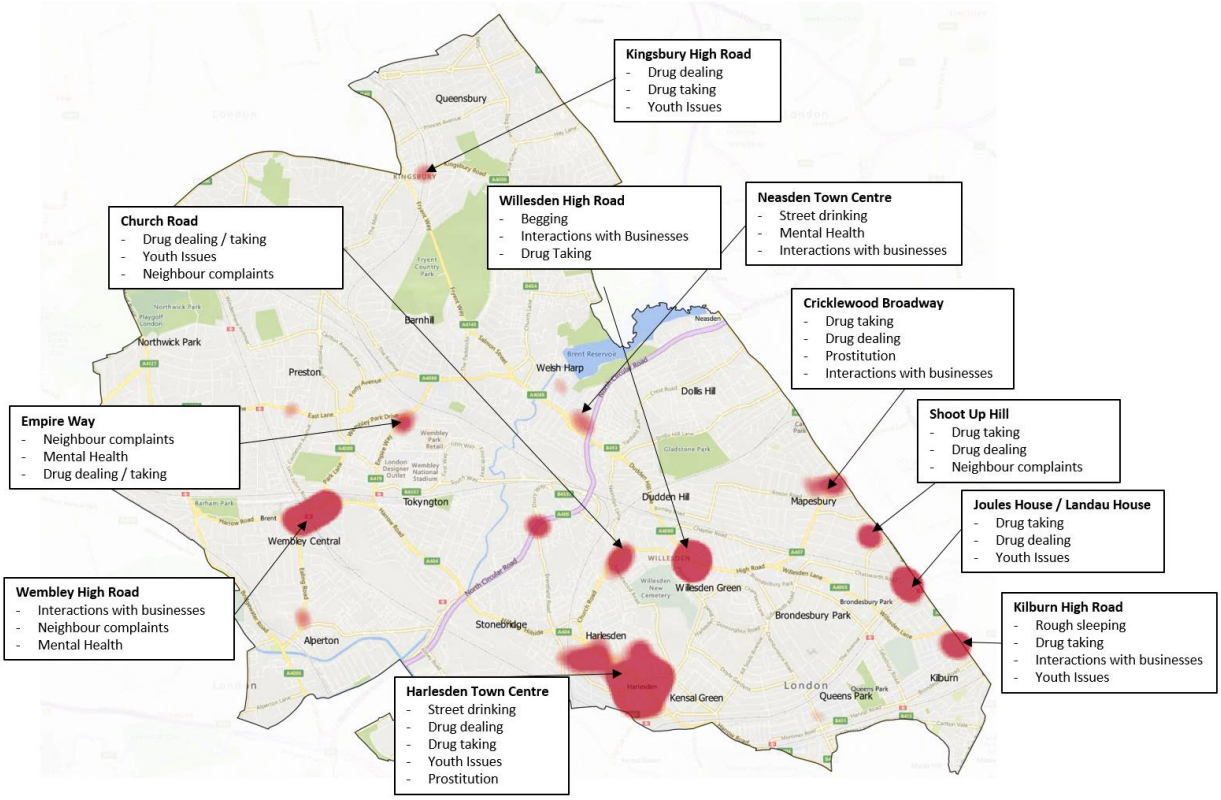
Ward	Police reports with alcohol reported	TNO Positioin
Wembley Central	63	3
Willesden Green	61	4
Tokyngton	58	5
Stonebridge	55	1
Harlesden	52	2
Kensal Green	36	6
Alperton	36	11
Kilburn	36	7
Northwick Park	34	19
Dudden Hill	33	8
Welsh Harp	33	15
Sudbury	31	18
Queensbury	30	10
Barnhill	29	12
Kenton	27	21
Queens Park	25	13
Mapesbury	24	9
Fryent	23	20
Preston	23	16
Brondesbury Park	22	17
Dollis Hill	18	14

ASB in Brent:

ASB is highlighted as a key concern for residents of Brent. ASB has increased across the Borough, and nationally. Locally, this could be down to increased reporting and an escalation in open drug markets and the impact of gang activities in Brent. Visible evidence of disorder through unchallenged ASB leads to less secure communities, and can impact negatively on feelings of safety and mental health. Environmental ASB is expensive to react to and leads communities to consider their neighbourhoods negatively, which in turn leads to social disorganisation.

When considering population, Brent had a slightly higher than average ASB incidents per 1000 population in 2021 compared with the rest of London. The average was 37.49 incidents per 1000 people with Brent at 39.35 calls per 1000 people.

The map below shows the hotspots of ASB in Brent. All the hotspots of ASB are in or adjacent to town centres. For each hotspot, the main ASB concerns are highlighted. Town centre areas continue to be affected by abusive or difficult residents with mental health or substance misuse issues including alcohol.



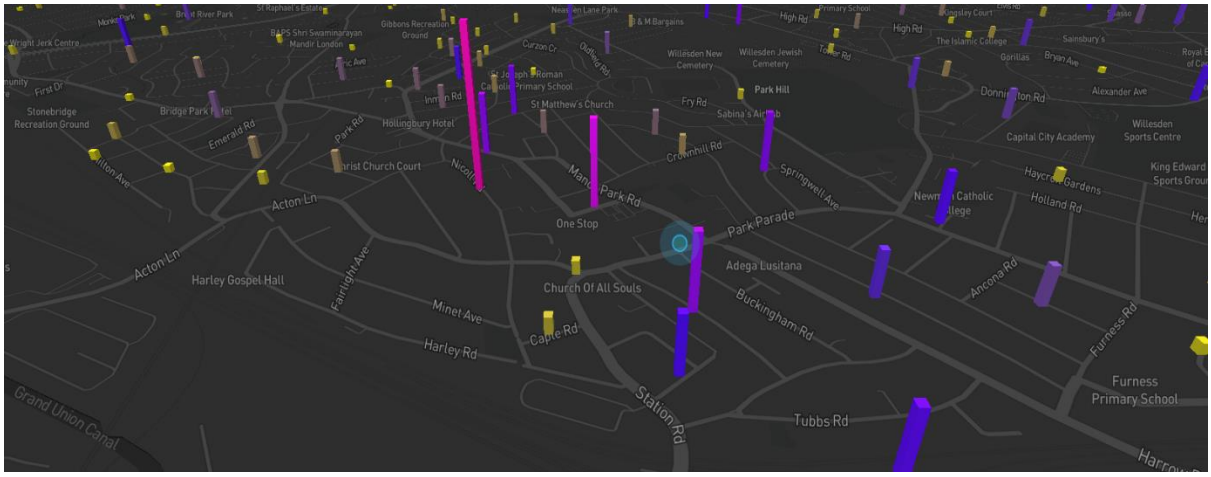
Data captured outlined in this document has been mapped and shown sufficient evidence to implement CIZs in the specified areas. In particular crime data and evidence shows a correlation between concentrations of off licences and anti-social behaviour where alcohol is often a significant issue.

The maps used below show reported crime data (Total Notifiable Offences) by postcode. This also protects victims of crime in order that they cannot be identified to low numbers of reporting when broken down lower.

Harlesden

Harlesden town centre consists of a series of parades of shops that run along Craven Park, Craven Park Road, Park Parade and High Street Harlesden. The town centre falls between, Harlesden and Kensal Green ward and is one of the most deprived areas in the borough. Harlesden Town Centre is a hotspot for alcohol flagged calls to the Police for crime and antisocial behaviour and street drinking. The data shows the whole of the town centre suffers from high levels of alcohol related issues, including residential street off the main town centre such as Rucklidge Avenue, Wendover Road, Buckingham Road and St Albans Road.

Harlesden Town Centre is also the primary hotspot for reports of street drinking to police. All other town centres in Brent suffers from street drinking; however, in parts of Harlesden such as Craven Park Road and High Street, the street drinking interrelates with drug misuse and violent crime.



The higher the bar the higher the reporting of the chosen dataset is in the area.

Crime Type	Number of reports
ASB	184
Public Order	28
Robbery	22
Violence/Sexual	87
TOTAL	321

The streets to be included in Harlesden are:

- Craven Park Road
- Craven Park
- Nicoll Road
- High Street
- Park Parade
- Manor Park Road
- Wendover Road

Wembley Central (Wembley High Road/North End of Ealing Road)

Wembley Central is a ward which includes two busy shopping parades on Wembley High Road and the north end of Ealing Road. Wembley central has areas of low to medium levels of deprivation.

Wembley Central is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour. The data shows the whole of the High Road from Ealing Road to Wembley Triangle experiencing high levels of crime associated with alcohol.

During the period of July 2019 and June 2022;

Crime Type	Number of reports
ASB	118
Public Order	39
Robbery	18
Violent/Sexual	104
TOTAL	279

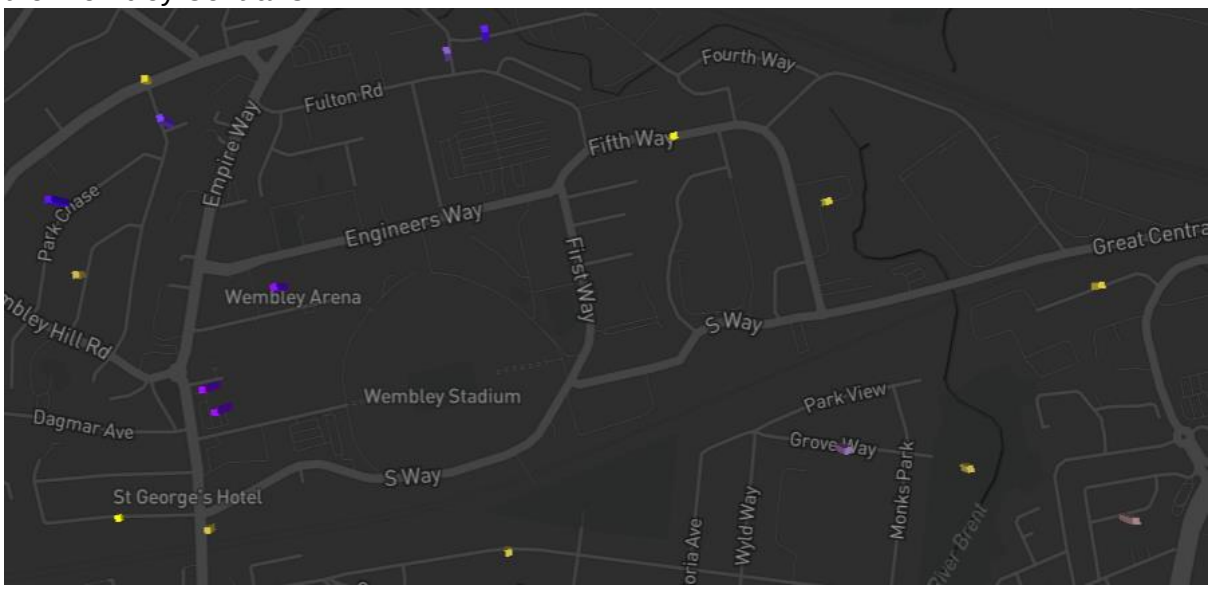
The streets to be included in Wembley Central are:

- High Road
- Lancelot Road
- Harrow Road
- Empire Way
- London Road
- Central Square

Wembley Park

Wembley Park will be a new CIZ which would include the new developments in the area. It includes the roads surrounding the Stadium. Due to the number of events and the increased number of shops the data shows there is a high level of ASB in the area.

This new area comprises of St John's Avenue and Park Lane which will be removed from the Wembley Central CIZ.



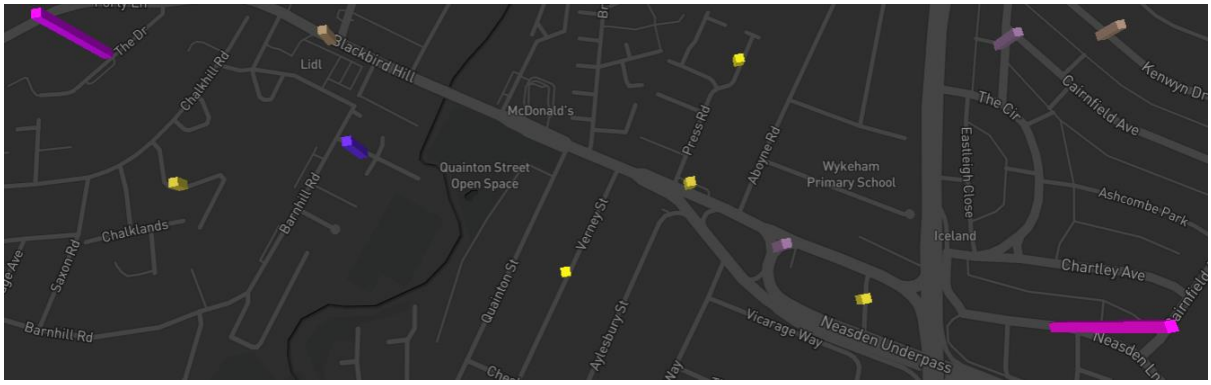
Crime Type	Number of reports
ASB	147
Public Order	15
Robbery	5
Violence/Sexual	99
TOTAL	266

The streets to be included in Wembley Park are:

- Empire Way
- South Way
- Wembley Hill Road
- Engineers Way
- Park Lane
- St Johns Avenue

Neasden Town Centre

Neasden town centre consists of a medium sized parade of shops that run along Neasden Lane which is just off the North Circular Road. The town centre is primarily in Dudden Hill ward and in an area of medium to high levels of deprivation. Neasden Town Centre is a hotspot for alcohol flagged calls to the Police but not for crime and anti-social behaviour. However, Neasden Lane North, just outside the town centre, is a hotspot for both.



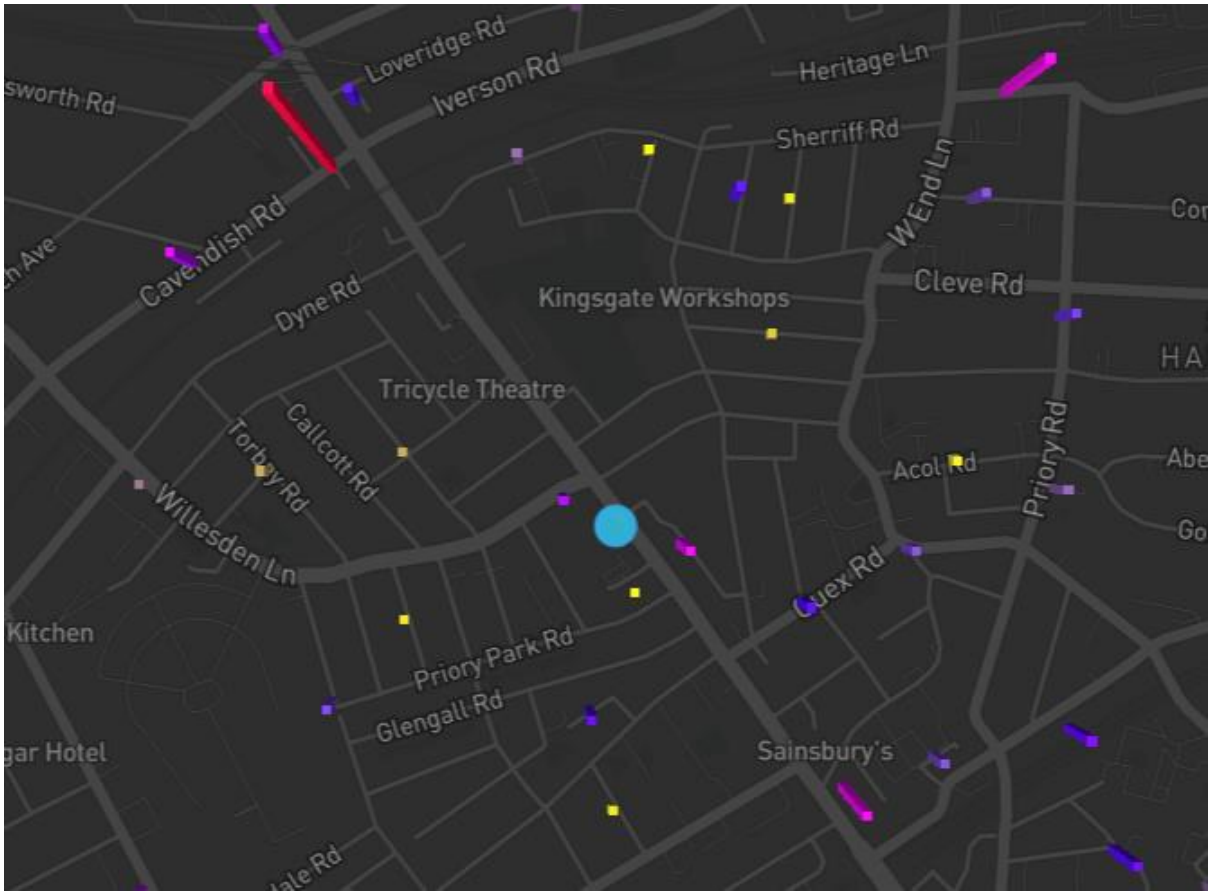
Crime Type	Number of reports
ASB	91
Public Order	27
Robbery	13
Violence/Sexual	81
TOTAL	212

The streets to be included in Neasden Town Centre are –

- Neasden Lane
- Neasden Lane North
- Blackbird Hill
- Birse Crescent
- Forty Lane (up until the road ‘The Paddocks’)
- Shoot Up Hill

Kilburn High Road

Kilburn High Road is a busy large shopping parade, which runs along the border of Brent and Camden. Kilburn High Road is predominately in an area of medium levels of deprivation apart from South Kilburn Estate, which has high levels of deprivation Kilburn High Road is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour.



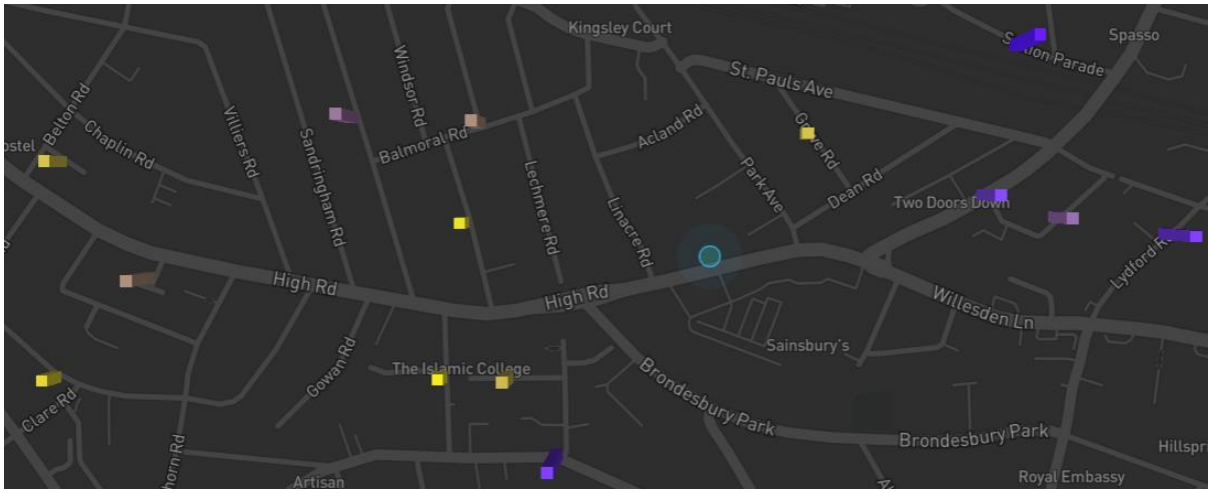
Crime Type	Number of reports
ASB	263
Public Order	58
Robbery	10
Violence/Sexual	225
TOTAL	556

The streets to be included in Kilburn are:

- Kilburn High Road
- Glengall Road
- Willesden Lane
- Cambridge Avenue
- Priory Park Road
- Cavendish Road
- Iverson Road

Willesden High Road

Willesden is busy large parade of shops in Willesden Green Ward. High Road, Willesden is in an area of medium to high levels of deprivation. High Road, Willesden is a hotspot for alcohol flagged calls to the Police for crime and ASB. The data shows the alcohol related issues are primarily just outside the town centre around the junction of High Road, Willesden and Pound Lane.



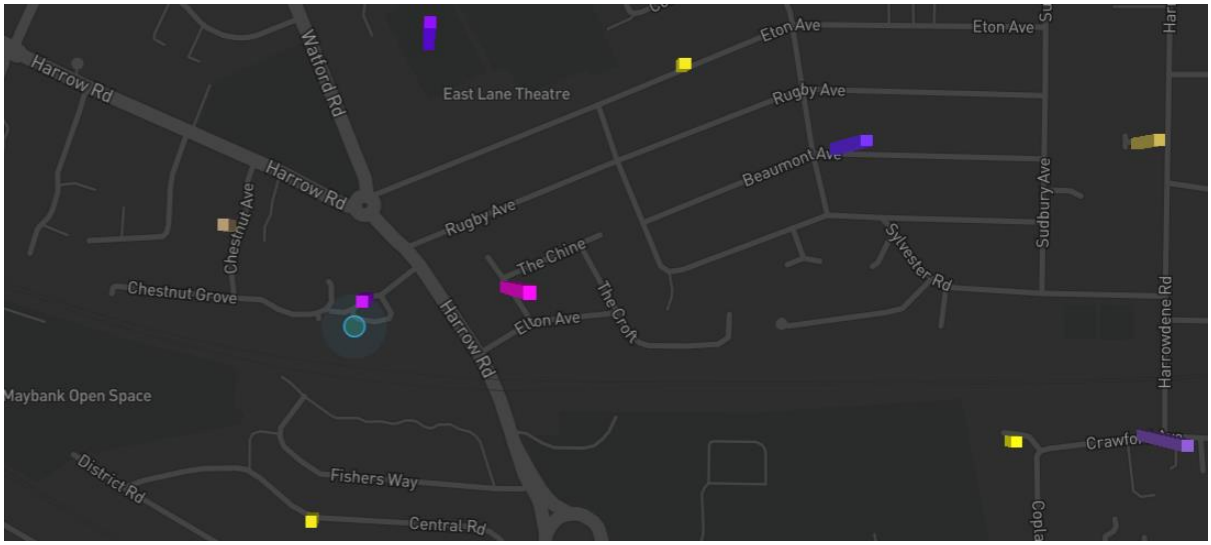
Crime Type	Number of reports
ASB	93
Public Order	31
Robbery	10
Violence/Sexual	106
TOTAL	240

The streets to be included in High Road, Willesden are:

- High Road
- Chapter Road
- Dudden Hill Lane
- Walm Lane
- Station Parade
- Willesden Lane
- Pound Lane

Sudbury Town Centre

Sudbury Town Centre is a medium sized shopping parade in an area of low levels of deprivation. Sudbury Town Centre is a minor hotspot for alcohol related police calls within Brent. Calls are generally related to the area from the roundabout at Butler's Green to the junction of Sudbury Crescent and Harrow Road.



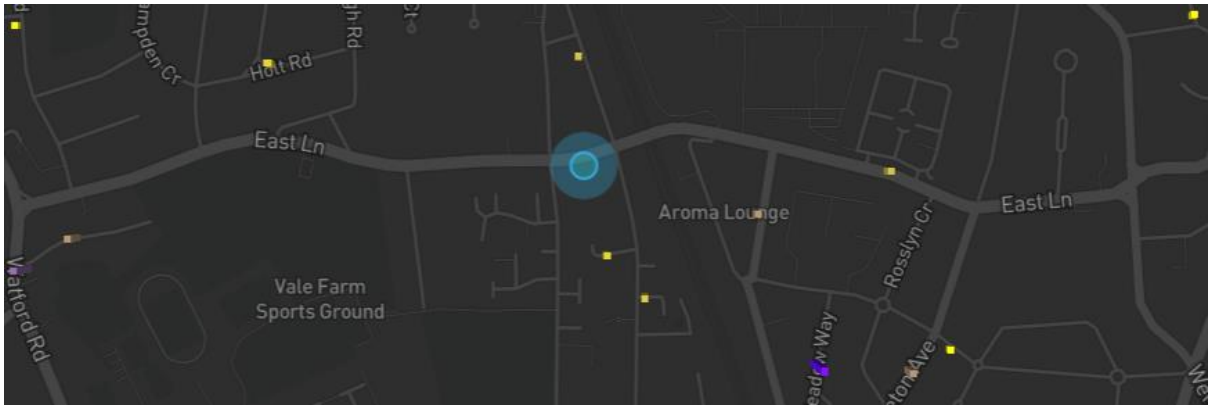
Crime Type	Number of reports
ASB	114
Public Order	20
Robbery	3
Violence/Sexual	72
TOTAL	209

The streets to be included in Sudbury Town Centre are:

- Harrow Road
- Watford Road
- District Road

East Lane

East Lane in North Wembley is a small sized shopping parade in an area of Medium levels of deprivation. East Lane is not a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour. Recent data has shown a reduction in this area, however historically this has been a challenging location and sits between 2 other CIZ locations.



Crime Type	Number of reports
ASB	84
Public Order	5

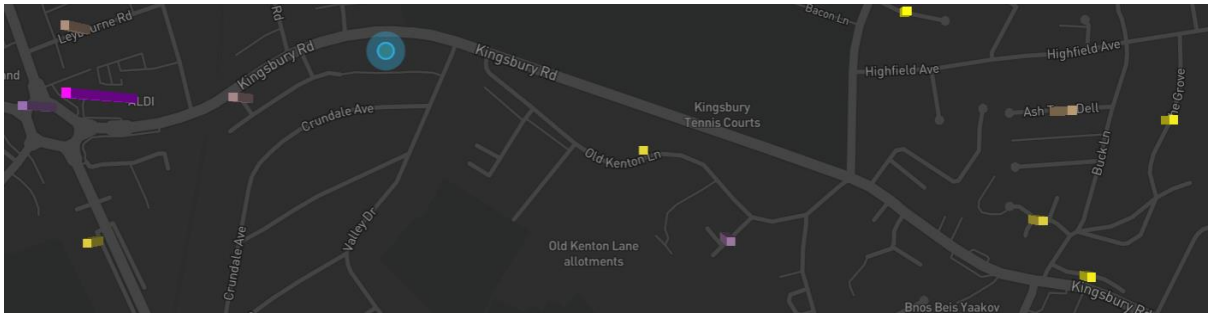
Robbery	0
Violence/Sexual	31
TOTAL	120

The streets to be included in East Lane are:

- East Lane
- Sudbury Avenue

Kingsbury

Kingsbury town centre is busy shopping parade on both sides of a main road in an area of low to medium levels of deprivation. Kingsbury is a hotspot for alcohol flagged calls to the Police for crime and anti-social behaviour in the north of the Borough. The hotspot area is around the London Underground station.



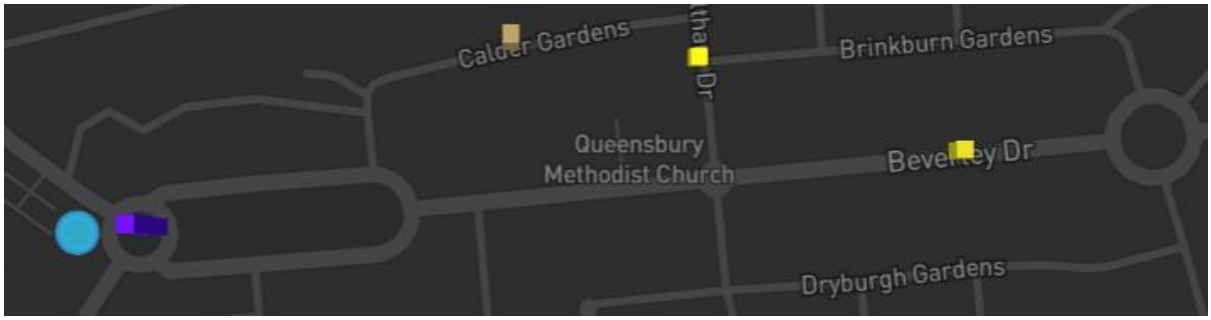
Crime Type	Number of reports
ASB	73
Public Order	11
Robbery	6
Violence/Sexual	68
TOTAL	158

The streets to be included in Kingsbury are:

- Kingsbury Road
- Edgware Road
- Church Lane
- Hay Lane
- Kenton Road
- Berkeley Road

Queensbury

Queensbury station parade is a parade of shops, businesses and restaurants surrounding a green public area in an area of Medium levels of deprivation. Incidents of street drinking are high perception wise, although they are not reflected in calls to police. This is a significantly smaller geographical area compared to other CIZs.



Crime Type	Number of reports
ASB	14
Public Order	4
Robbery	1
Violence/Sexual	24
TOTAL	43

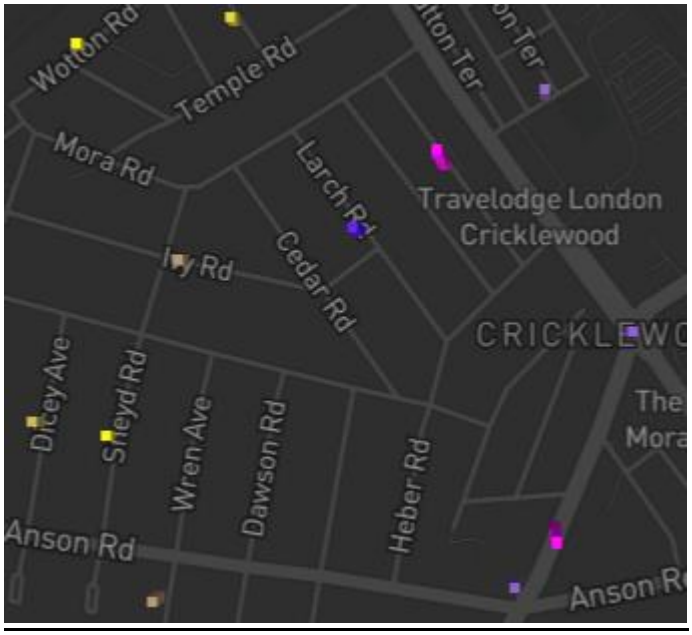
The streets to be included in Queensbury is:

- Queensbury Station Parade
- Beverley Drive

Cricklewood Broadway

Cricklewood Broadway is a busy High Street with a variety of shops on one side of the Broadway which is in Brent. The data shows that there is a high level of ASB.

This will be a new CIZ for Brent.



Crime Type	Number of reports

ASB	149
Public Order	2
Robbery	6
Violence/Sexual	81
TOTAL	238

The streets to be included in Cricklewood Broadway is:

- Cricklewood Broadway
- Anson Road
- Shoot up Hill
- Chichle Road

Recommendations

It is recommended that the Council continues to have in place the current ten CIZs. These are in the following areas;

Harlesden

Wembley Central

Ealing Road

Kilburn High Road

Willesden High Road

Neasden Town Centre

East Lane

Kingsbury

Queensbury Station Parade

Sudbury Town – Harrow Road and Watford Road.

The Council also recommends that two new CIZs are implemented in Wembley Park and Cricklewood Broadway.