

## Background

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The Licensing Act 2003 regulates the sale of alcohol, provision of entertainment and provision of late night refreshment (sale of hot food or drink after 11pm). Section 5 of the Licensing Act 2003 requires licensing authorities to prepare and publish a Statement of Licensing Policy every three years. The council's first Statement of Licensing Policy was adopted by council on 12<sup>th</sup> January 2005 and was initially reviewed every three years, however in April 2012, the Police Reform and Social Responsibility Act changed the length of the lifetime of a policy from three to five years.

The Statement of Licensing Policy is due to be reviewed and consulted upon this year, with a new policy in place for January 2019.

At Licensing Committee in January 2018, Members resolved to form a working group of five members of the Licensing Committee to work with officers to review the Statement of Licensing Policy prior to public consultation in June to August of this year. The working group looked at the Cumulative Impact Policy and all six cumulative impact areas specified within it, as well as local licensing guidance and other more general matters.

## The law

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Prior to 2018, cumulative impact was a concept introduced in the Government's Section 182 Guidance issued under the Licensing Act 2003. It provided a rebuttable presumption for the refusal of licence applications in areas where the impact of an accumulation of licensed premises had a negative effect on the promotion of the licensing objectives. This is in contrast to the otherwise permissive regime under the Licensing Act 2003.

Many local authorities introduced cumulative impact policies and described areas in their policies as cumulative impact zones, stress zones or concentration zones. In Leeds the cumulative impact policy was included in the Statement of Licensing Policy with six areas being described as falling under this policy. Nationally, cumulative impact policies are popular and well supported by Licensing Committees and, on appeal, by Magistrates Courts. However, until 2018, they were only a concept in the guidance and had no statutory basis. There were no guidelines on the level of evidence required. Local authorities called for cumulative impact policies to be introduced into the law so they have a legal footing.

In the Policing and Crime Act 2017 the Government took the step of doing just that. The legislation states that a licensing authority may publish a document ("a cumulative impact assessment") stating that it considers that the number of premises licences or club premises certificates is at such a level that it would be inconsistent with the promotion of the licensing objectives to grant any further licences or certificates in that area and restrict changes to licensable activities of existing licences.

A cumulative impact assessment must set out the evidence for the authority's opinion and before publishing it, the licensing authority must consult with people affected by the assessment, including the responsible authorities, businesses and the public. The assessment must be reconsidered every three years and any review must be consulted upon before deciding whether it remains or can be removed. A licensing authority must publish any revision of a cumulative impact assessment along with the evidence.

The impact of this step is to put cumulative impact policies within the primary legislation, with a prescribed method for implementing a cumulative impact assessments and to provide some guidance regarding the source and level of evidence required to put a policy in place. This part of the Policing and Crime Act 2017 was commenced in April 2018. Amended S182 Guidance was published at the same time.

## In Practice

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In publishing a cumulative impact assessment the council is setting down a strong statement of intent about its approach to considering applications for the grant of variation of premises licences or club premises certificates in the areas described. The council must have regard to the assessment when determining or revising the statement of licensing policy and must have regard to the policy and the section 182 guidance when making determinations.

The cumulative impact assessment does not change the fundamental way in which licensing decisions are made and it is open to the council to grant an application where it is appropriate and where the applicant can demonstrate through the operating schedule that they would not add to the cumulative impact. Applications in areas which are covered by a cumulative impact assessment should therefore give consideration to potential cumulative impact issues when setting out the steps that will be taken to promote the licensing objectives.

A cumulative impact policy does not lead to an automatic blanket ban on the grant of licences and the council can only consider using a cumulative impact assessment to refuse an application if relevant representations are made. Where no representation is received the council must grant the licence.

A cumulative impact assessment does not relieve responsible authorities, local residents and residents groups or any other person of the need to make representations where they consider it appropriate so that the licensing objectives are promoted. Anyone making a representation can base it on the information provided in this assessment, or even just on the fact that an assessment has been published. It remains the responsibility of anyone making a representation to ensure it can withstand the scrutiny to which they will be subjected to at a hearing.

## History of Cumulative Impact in Leeds

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In 2005 Leeds City Council developed the first licensing policy. During the consultation the council received a number of requests for a cumulative impact policy and the evidence was gathered for the city centre and Headingley. A third area was considered along the Woodhouse corridor as there was concern that by restricting the availability of licences in the city centre and Headingley, applicants would instead apply for licences in the area in between. During the consultation there was also strong support for Chapel Allerton to be included in the cumulative impact policy. Evidence was gathered and this fourth area was proposed on the basis of crime and disorder and public nuisance.

In 2007 the council received a request to include Hosforth due to nuisance issues on Town Street. Evidence was gathered and a draft policy was consulted upon and included in the policy.

In 2010 officers reviewed all five areas with West Yorkshire Police, ward members and residents. Officers attended a number of community meetings, and area committees to ensure that the current policy was still supported. The outcome of this review were a number of changes to the scope of the current areas:

- City centre changed from named streets to an area
- Headingley increased to include Hyde Park
- Horsforth increased to include New Road Side
- Reference to licence applications for variations to existing licences included in all five cumulative impact areas
- Late opening restaurants and takeaways added to city centre, Headingley, Chapel Allerton and Horsforth.

A further review was undertaken in 2012:

- City centre became zoned with one red zone around the Call Lane/Lower Briggate/Duncan Street/Assembly Street area to be reviewed annually and the boundary changed as needed
- Headingley to include off licences operating after midnight
- No change to Woodhouse, Chapel Allerton or Horsforth

The annual review of the city centre in 2015 added a second red zone to the north of the city centre.

In 2016 Armley was identified as an area suffering from antisocial behaviour displayed by groups of men standing and drinking in the street. It could be reasonably expected that these people were drinking alcohol purchased on Town Street and so a new area was described covering Armley Town Street and Branch Road and relating just to off licences.

By the review in 2018 the council had identified six areas which were suffering from cumulative impact and the Policy included:

- Area 1 – City Centre
- Area 2 – Headingley and Hyde Park
- Area 3 – Woodhouse
- Area 4 – Chapel Allerton
- Area 5 – Horsforth
- Area 6 – Armley

## Review of the Cumulative Impact Assessment

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It is the intention of the council to review this cumulative impact assessment every three years. Because of the dynamic nature of the city centre, it may be necessary to review the city centre evidence annually and to produce a separate cumulative impact assessment for that area.

Any review of the cumulative impact assessment will follow the same process:

- A call for evidence, sent to all responsible authorities and other interested parties through the Licensing Enforcement Group
- The request of police crime statistics specifically for the area in questions and the thorough examination of the evidence to determine if there is evidence of cumulative impact
- Liaison with the responsible authorities to gather further evidence through complaint statistics or other formal and informal action taken
- Consultation with ward members, through the Community Committees, local businesses and responsible authorities
- The Cumulative Impact Assessment will be approved by Licensing Committee
- Any amendments which require the removal or addition of cumulative impact areas will necessitate a revision of the Statement of Licensing Policy

## 2018 Review of the Cumulative Impact Areas

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This cumulative impact assessment has been carried out in accordance with Section 5A of the Licensing Act 2003.

The council issued a Call for Evidence through the Licensing Enforcement Group which comprises of responsible authorities and other interested agencies. Following this call for evidence West Yorkshire Police provided crime statistical data for each of the existing cumulative impact areas. The reports were analysed by officers from Entertainment Licensing and discussed with the Police Licensing Team and a provisional cumulative impact assessment was drawn up for each of the areas for further discussion. A more complete cumulative impact assessment was completed for the City Centre in line with the usual practice of reviewing the city centre figures each Autumn.

A working group comprising of Area Officers and Ward Members from Gipton and Harehills and Burmantofts and Richmond Hill wards requested that the licensing authority investigate a possible cumulative impact area for Harehills, specifically around Harehills Road and Harehills Lane. This work commenced in February 2018.

Following on from the 2017 review of the City Centre Cumulative Impact Area, Licensing Committee, at their meeting in January 2018, formed a working group of members of the Licensing Committee, officers from Entertainment Licensing, Legal Services and West Yorkshire Police to review the current cumulative impact areas, and to review the use of the Local Licensing Guidance. The working group agreed to further research amendments to the cumulative impact areas as follows:

- City Centre – remove the green area, contract the amber area to the areas where the night time economy is the most active, change the scope of the cumulative impact area in the red zone to put emphasis on operation during peak hours.
- Headingley – split the Headingley cumulative impact area into two. One are to be focused on North Lane, removing the top and bottom of the Otley run, and a second area focused round Hyde Park and Brudenell but concentrating on late night refreshment and night time opening off licences.
- Woodhouse Corridor – to be removed
- Chapel Allerton and Horsforth – cumulative impact areas to be removed and replaced with Special Area Policies
- Armley – to remain as it is currently.

The working group discussed Local Licensing Guidance which seeks to give applicants further guidance about localities in inner Leeds. These documents include information about the localities but is now out of date. The working group considered whether to refresh the data, or whether to include the concept in the policy and to provide data sources where applicants can search for the most up to date data available. The second approach was preferred.

Officers were tasked with drawing up these proposals and to start pre-consultation work with the locality teams and community committees, as well as the responsible authorities.

The Locality Team for Harehills and Gipton met along with elected members and officers from West Yorkshire Police, Environmental Health, Public Health and Entertainment Licensing in February 2018. The group discussed the tenet of cumulative impact assessments, the legislative changes which set a higher bar for evidence and the evidence we already gather. The group resolved to look at the current evidence, undertake some community engagement, build up the evidence to be used when making representations to applications in the Harehills area and then to meet at a later date to review this information to establish if a cumulative impact area should be progressed. It is likely that

the timescales are too short to allow for inclusion in the 2019-2023 policy, but could be added at a later date.

The Licensing Committee Working Group met in February 2018 and examined a comparison of the crime statistics for the city centre, Headingley, Chapel Allerton, Horsforth and Woodhouse. As the Armley cumulative impact area is based on antisocial behaviour it is hard to draw a direct comparison with the other areas.

However the Working Group agreed to progress the changes to the cumulative impact areas as outlined in the first meeting, and a draft policy be prepared and presented to Licensing Committee prior to going out to a public consultation. It was agreed that meetings would be held with the local ward members for Horsforth and Chapel Allerton, after the election in May.

Officers met with the three ward members for Chapel Allerton in May 2018 to discuss cumulative impact in Chapel Allerton. Officers explained that the evidential bar had been raised. Ward members expressed disappointment that the cumulative impact policy (as it was previously called) had not delivered the results that were expected and that licences had been granted in the area. Officers and ward members discussed alternatives including local licensing guidance or a special area policy. Discussion took place around whether this policy could be used in making licence determinations and in negotiations with applicants, but could also provide some guidance to other regulatory schemes, such as planning. It was agreed that specific resident consultation was important and that a public meeting be arranged in September during the public consultation on the Statement of Licensing Policy where residents would be able to air their views on licensing in Chapel Allerton.

Meetings have taken place between officers from Entertainment Licensing and Public Health to progress the development of a Licensing Matrix. This would be a tool that could be used by the licensing authority to provide additional data for licensing policy reviews and responsible authorities when making representations to licensing applications. This tool was completed and presented to Licensing Committee in July 2018.

In July 2018 a draft Cumulative Impact Assessment was compiled using licensing statistics, the Public Health Licensing Matrix, the West Yorkshire Police crime statistic reports, as well as information provided by Ward Members and residents. The outcome of this assessment is the following areas to be described as cumulative impact areas:

- City Centre – including two red zones
- Headingley
- Hyde Park
- Armley
- Harehills

The following areas to cease being considered as suffering from cumulative impact, however to be reviewed again should it become apparent to ward members, area teams and residents:

- Chapel Allerton
- Horsforth
- Woodhouse Corridor

## Types of Evidence

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### **Alcohol Licensing Data Matrix**

Public Health were made a Responsible Authority in 2011. However, in the absence of Health as a Licensing Objective, it is very challenging for Public Health to engage meaningfully within the licensing process. Nevertheless, Public Health England and the Local Government Association strongly acknowledge and support the importance of public health input into licensing and have encouraged the development of innovative ways to influence the process within the restrictive boundaries of the Licensing Act 2003.

Public Health has access to numerous key data sources which are not easily accessible by other Responsible Authorities, which can be used to inform the licensing process to help to identify potentially harmful applications and provide the evidence base to support associated decisions. Public Health England has published national guidance on how local Public Health teams can best utilise this data to influence the licensing process. The development of a data matrix which combines and analyses multiple key data sources is a method already used in other Local Authorities including Wigan, Wolverhampton and Cornwall.

In Leeds with the support of Entertainment Licensing, Public Health has developed a local version of a data matrix which risk rates Lower Super Output Areas (LSOA) across Leeds, based on potential alcohol related harm. Data sources have been chosen due to their relevance to the licensing objectives. Any LSOA in Leeds can be inputted into the matrix, which then provides a comparative citywide "harm ranking".

**Data Sources** - Data sources have been chosen to correspond with the four licensing objectives. Alcohol-related health data has been included as this is an important addition and can be used to 'set the scene' of the wider alcohol-related harm in an area. This is in line with recommendations from Public Health England.

**Weighting of Data** - All data sources are not equally important in respect of the licensing objectives. Therefore, based on knowledge and experience of the Responsible Authorities, each data set has been given a different weighting which will affect how much it contributes to the overall ranking. The citywide ranking of each individual data set is not affected by this.

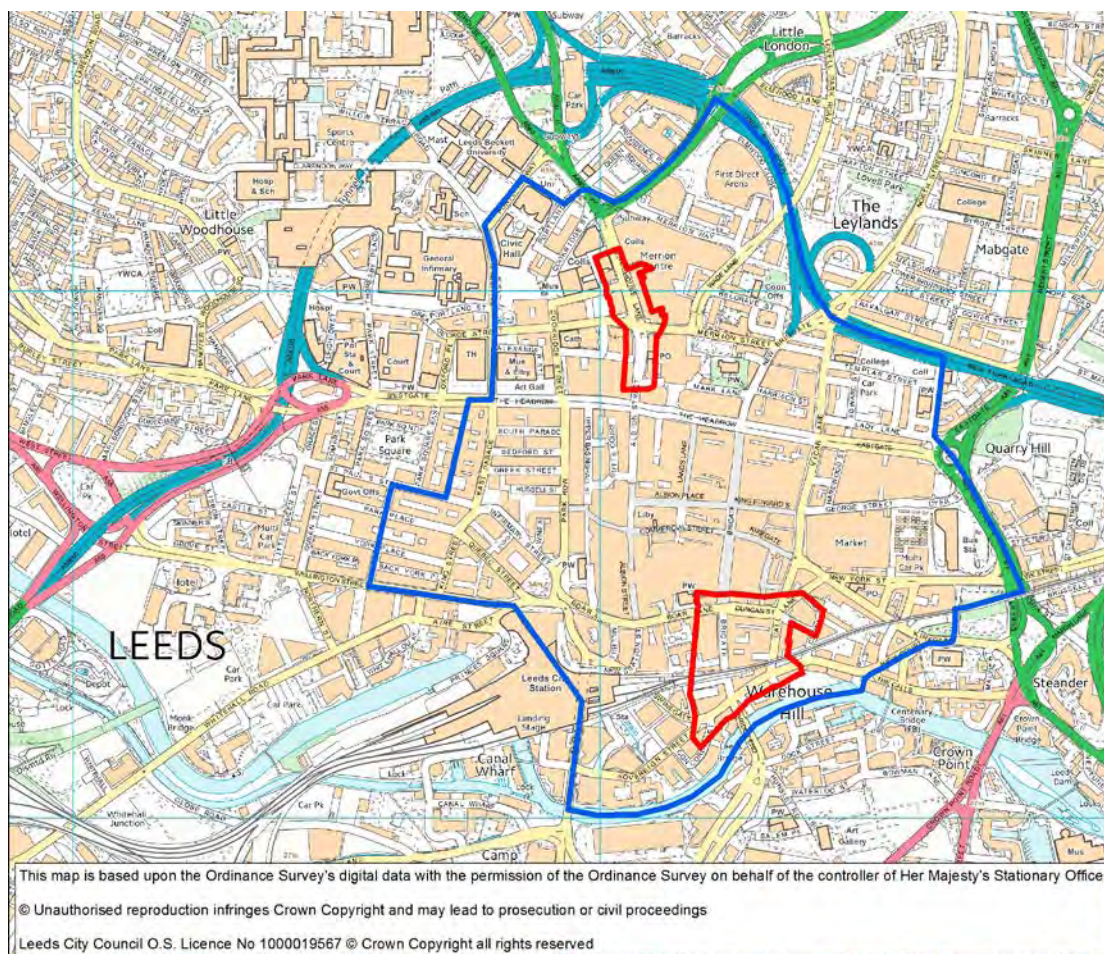
### **Police Statistical Data**

The Leeds District Analysis Unit has provided a statistical crime report for each of the assessed areas. These reports include, as a minimum, crime typically associated with the consumption of alcohol such as affray, assault, drunk and disorderly, public order offences, robbery, theft from person and theft non-specific. Each of the reports is slightly different and uses crime figures from different time periods. The Police have provided analysis for the statistics in their conclusions. Where appropriate the report may give information regarding peak hours and days for crime.

The council has used extracts from the crime reports to aid the assessment. The complete crime reports are available from Entertainment Licensing.

## City Centre

The city centre cumulative impact area relates to the city centre. It is placed within the Little London & Woodhouse and Hunslet & Riverside wards.



West Yorkshire Police has shared information and statistics that show that the nature of the city centre is such that the cumulative impact of licensed premises leads to problems that aren't experienced in other parts of the city and this can be attributed to the density of licensed premises in specific areas. The number and close proximity of venues on a street can result in difficulties in identifying individual premises as causing problems and so action planning and reviewing individual licences is not possible.

The closure or opening of businesses can have a dramatic effect on reported crime and incidents in an area. While problems at individual premises are dealt with using action planning and the review process, there are areas in Leeds city centre which become saturated as new businesses open or existing businesses change their style of operation. In addition the council recognises that a previous problem area can be improved by the introduction of new styles of business types and seeks to encourage this.

West Yorkshire Police have provided a crime report for 2016-17 which shows that the crime levels in the city continue to rise. In the past year recorded crimes have increased by 15% across the city centre. Assaults and theft from person offences have seen the highest increases and robbery offences have changed the most. All offences have increased. Assaults and non-specific theft are the highest associated with licensed premises and increased the most in the last year.



Assault continues to be the highest alcohol related crime, followed by drunk and disorderly offences. While drunk and disorderly offences decreased, public order offences increased.

There are two distinct areas in the city where extra police resources are deployed on a regular basis. These areas are the Call Lane area and the Albion Street/ Woodhouse Lane area. With the support of LeedsBID, BACIL and Leeds City Council, street marshals, or evening ambassadors, patrol these two areas as it has been recognised that incidents on the street require extra attention and that early intervention can prevent an escalation in the severity of incidents on the street.

The issues with disorder in the street on Call Lane has led to a road closure between 11pm and 5am on the Friday, Saturday and Sunday night which took effect in October 2015. The sheer numbers of people, often intoxicated, in the street during these hours highlights the need for the overall capacity of the red area to decrease, not increase.

The council continues to receive applications within the areas designated as red. There has been a trend for existing operators to apply for minor and full variations to bring into use unlicensed areas. In all cases the premises licence holder has undertaken to keep their capacity the same. However this trend for increasing the licensed area is concerning as the ability to control capacity is difficult. Any application seeking an increase in floor space, even without an increase in stated capacity, can expect close scrutiny.

The council has designated two zones in the city centre as 'red'. These are areas that are considered highly saturated and that are experiencing particularly high levels of crime, disorder and/or nuisance. An application received from premises located in the two red areas, and operating during the peak hours, can expect to receive representations from West Yorkshire Police and the Licensing Authority that recommend refusal. The responsible authorities are unlikely to negotiate conditions or additional measures on licences in the red area, as the impact on the licensing objectives is at such a level that the area cannot support any more premises opening or extending their operation.

Any variation that will effectively increase the occupancy of premises will be viewed in a similar light to a new application as it may increase the available capacity in the same way a new premises in that area would, which in the red area would be unacceptable. Similarly new businesses seeking to introduce a new concept, and so attract different people into the area, may be acceptable elsewhere in the city centre but in the red area the problems are exacerbated by the sheer number of people on the street during the peak hours and introducing a new or extended business, even with a different concept, would add to the impact rather than reduce it.

Management controls such as door staff will not be adequately effective in preventing an increase in the number of people within the red zone.

In the rest of the city centre cumulative impact area, the council will expect applicants to offer additional measures tailored to the problems in that area. Applicants are strongly advised to consult with West Yorkshire Police and the licensing authority during their application process. By working together, the responsible authorities and businesses can establish working practices that reduce crime and disorder and so benefit the long term aims of the city to be a vibrant, thriving economy.

Extra scrutiny is given to applications in these areas which appear to adopt a number of different styles during their trading. For example businesses that purport to be food led but seek late opening hours may be judged to be predominantly alcohol led due to their late night activities. It is for the applicant to demonstrate how their business will not add to the cumulative impact of licensed premises in that area through their operating schedule.



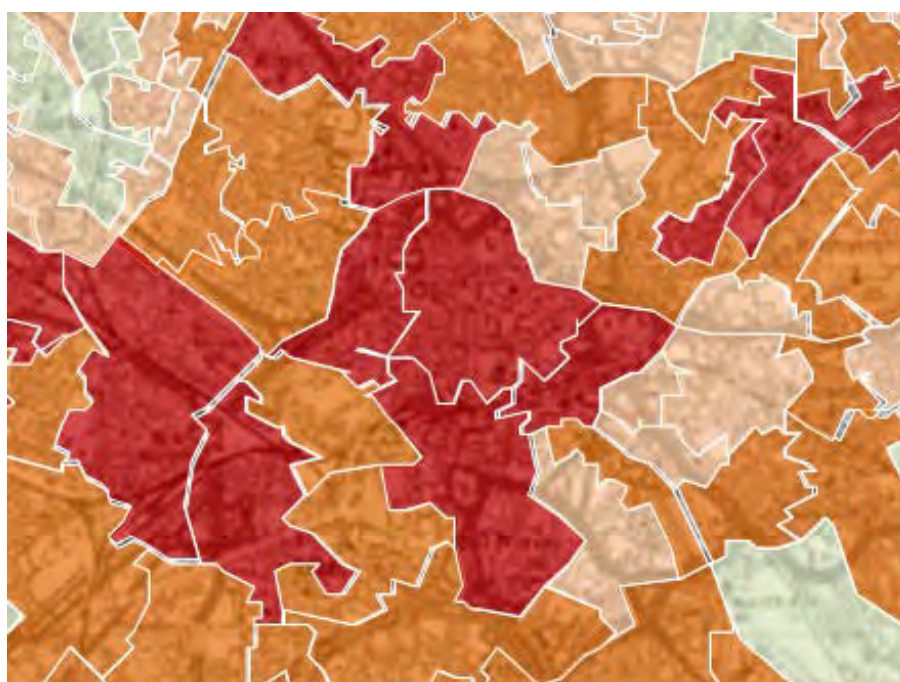
## Evidence

### Alcohol Licensing Data Matrix

A LSOA is Lower Layer Super Output Areas are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. Public Health have produced and maintain a licensing matrix which rank LSOAs (lower level super output area) against each other.

By entering postcodes the matrix displays the ranking of this postcodes LSOA against certain data sets. This allows responsible authorities and the licensing authority to establish the problems being experienced in the LSOA.

This map shows the city centre area. Dark red denotes the highest ranked LSOAs, followed by dark orange, light orange and green being the lowest ranked LSOAs.



The council has reviewed 3 postcodes in the city centre:

LS1 1UR – this is the area around the Civic Hall and includes The Headrow and Albion Street. It is within the City Centre, Headrow LSOA. It is ranked joint 2<sup>nd</sup> highest of all 482 LSOAs and is considered very high risk. This is the description given to the top 15 LSOAs for risk. This area is ranked highest in Leeds for alcohol specific hospital admission, alcohol related hospital admission, density of off licences, density of on licences, alcohol related antisocial behaviour, alcohol flagged non-violent crime, alcohol flagged violent crime and drunk/disorderly or over the prescribed limit.

LS1 4DT – this is the area around City Square. It is within the City Station, Bridgewater Place, Great Wilson Street LSOA. It is ranked 6 of all 482 LSOAs and is considered very high risk. This is the description given to the top 15 LSOAs for risk. This area scores top for alcohol specific hospital admission, alcohol related hospital admissions, density of off licence, and second for density of on licensed premises, alcohol flagged total crime excluding violent crime, alcohol flagged violent crime, and drunk/disorderly or over prescribed limit.

LS1 6RY – this is at the most easterly side of the city centre. It is within the Quarry Hill, Kirkgate, The Calls LSOA. It is ranked 1 of 482 LSOAs and is considered high risk. This is the description given to the top 15 LSOAs for risk. This area scores top for alcohol specific hospital admission, alcohol related hospital admissions, % of children who did not achieve 9-5 in English and Maths, density of off licence, and second for density of on licensed premises. It was ranked 4<sup>th</sup> for alcohol flagged non-violent crime, alcohol flagged violent crime, and drunk/disorderly or over prescribed limit.

This table shows the ranking for each of the data sets. Dark red denotes super high, dark orange for high, light orange for medium, and green for low.

	LS1 1UR	LS1 4DT	LS1 6LY
	Headrow, Albion Street Briggate	City Square, Station	Quarry Hill, Kirkgate, The Calls
Overall Ranking (out of 482)	2	6	1
Deprivation score	177	249	159
Alcohol specific hospital admissions - all ages	1	1	1
Alcohol related hospital admissions - all ages	1	1	1
Population aged 16 and under	477	464	478
Audit-C scoring >7 more units (GP recorded alcohol habit)	21	227	17
Looked After Children	277	277	277
NEET (Young people not in education, employment or training )	22	22	22
Youth offences	272	272	272
Education - % DID NOT achieve grade 9-5 in English and Maths	465	465	1
Alcohol Licensing - Off licensed premises density	1	1	1
Alcohol Licensing - On licensed premises density	1	2	3
Alcohol related Anti-Social Behaviour	1	4	2
Alcohol flagged total crime - excluding violent crime	1	2	4
Alcohol flagged violent crime	1	2	4
Drunk and disorderly or over prescribed limit	1	2	4
Clients who use alcohol services	-	-	66
Licensing risk scores	1	2	3

## Police Statistics

West Yorkshire Police has produced a crime report “*Leeds City Centre: Night Time Economy Related Crime*” dated September 2017 which has been referred to when reviewing this area. Extracts from this report are included below. A full copy of the report is available from Entertainment Licensing.

This report is referred to as the Police Report in this document. It uses reported crime figures from 01/09/2015 – 31/08/2017. The police report only compares statistics from the last two years, as the statistics are not comparable going further back than that due to the changes in the way in which crime is recorded. The following data tables and key findings (signified by bullet points) have been extracted from the police report.

This table shows the breakdown of occurrence type 01/09/2015 – 31/08/2017

Occurrence Type	01/09/2015 31/08/2016	01/09/2016 31/08/2017	Change +/-	% Change
Affray	38	52	14	37%
Assault	1300	1524	224	17%
Drunk And Disorderly	255	267	12	5%
Public Order	291	389	98	34%
Robbery	95	146	51	54%
Theft From Person	1168	1453	285	24%
Theft Non Specific	1518	1554	36	2%
<b>Total</b>	<b>4665</b>	<b>5385</b>	<b>720</b>	<b>15%</b>

This table shows the offences flagged as licensed premises involved 01/09/2015 – 31/08/2017

Occurrence Type	01/09/2015 31/08/2016	01/09/2016 31/08/2017	Change +/-	% Change
Affray	3	4	1	33%
Assault	251	263	12	5%
Drunk And Disorderly	15	15	0	0
Public Order	11	21	10	91%
Robbery	2	1	-1	-50%
Theft From Person	488	453	-35	-7%
Theft Non Specific	537	586	49	9%
<b>Total</b>	<b>1307</b>	<b>1343</b>	<b>36</b>	<b>3%</b>

This table shows the offences flagged as alcohol involved 01/09/2015 – 31/08/2017

Occurrence Type	01/09/2015 31/08/2016	01/09/2016 31/08/2017	Change +/-	% Change
Affray	14	18	4	29%
Assault	331	347	16	5%
Drunk And Disorderly	203	180	-23	-11%
Public Order	39	59	20	51%
Robbery	11	15	4	36%
Theft From Person	43	35	-8	-19%
Theft Non Specific	27	20	-7	26%
<b>Total</b>	<b>668</b>	<b>674</b>	<b>6</b>	<b>1%</b>

This table shows the offences during the DTE (06:00 – 17:59) between 01/09/2015 – 31/08/2017

Occurrence Type	01/09/2015 31/08/2016	01/09/2016 31/08/2017	Change	% Change
Affray	6	10	4	67%
Assault	288	320	32	11%
Drunk And Disorderly	35	30	-5	-14%
Public Order	149	214	65	44%
Robbery	29	38	9	31%
Theft From Person	352	599	247	70%
Theft Non Specific	674	705	31	5%
<b>Total</b>	<b>1533</b>	<b>1916</b>	<b>383</b>	<b>25%</b>

This table shows the offences during the NTE (18:00 – 05:59) between 01/09/2015 – 31/08/2017

Occurrence Type	01/09/2015 31/08/2016	01/09/2016 31/08/2017	Change +/-	% Change
Affray	32	42	10	31%
Assault	1012	1204	192	19%
Drunk And Disorderly	220	237	17	8%
Public Order	142	175	33	23%
Robbery	66	108	42	64%
Theft From Person	816	854	38	5%
Theft Non Specific	844	849	5	5%
<b>Total</b>	<b>3132</b>	<b>3469</b>	<b>337</b>	<b>11%</b>

The tables clearly show that there has been an increase in crime across the city centre again this year. The police report conclusions state:

- An analysis of the examined offences shows overall offending in the City Centre has increased by 15% compared with the previous examined period.
- During 01/09/2016 and 31/08/2017, Assaults and Theft from Person offences have seen the highest increases in terms of volume compared with the previous year. Robbery offences have experienced the greatest percentage change. All examined offences experienced an increase in volume.

#### Street Level Data

The tables below relate to Leeds City Centre night time economy offending only (18:00 to 05:59) and show the top ten streets and the top ten streets of increasing concern for the night time economy offending. The table shows the percentage of the street compared with the city centre total.

Top 10 Street Names	2015 - 2016	% of City 2015-2016	2016 - 2017	% of City 2016 -2017	Change +/-
BRIGGATE	572	18.3%	574	17%	2
CALL LANE	531	17%	565	16.8%	34
ALBION STREET	263	8.4%	294	8.7%	31
WOODHOUSE LANE	213	6.8%	248	7.3%	35
BOAR LANE	140	4.5%	178	5.2%	38
COOKRIDGE STREET	99	3.2%	116	3.4%	17
THE HEADROW	88	2.8%	109	3.2%	21
MERRION STREET	113	3.6%	98	2.9%	-15
GREAT GEORGE ST	76	2.7%	95	2.8%	19
HEATONS COURT	72	2.3%	79	2.3%	7

Top 10 Street Names Of Increasing Concern	2015 - 2016	% of City 2015-2016	2016 - 2017	% of City 2016-2017	Change +/-
CALL LANE	531	17%	565	16.8%	34
ALBION STREET	263	8.4%	294	8.7%	31
WOODHOUSE LANE	213	6.8%	248	7.3%	35
BOAR LANE	140	4.1%	178	5.2%	38
THE HEADROW	88	2.6%	109	3.2%	21
GREAT GEORGE ST	76	2.2%	95	2.8%	19
LOWER BRIGGATE	27	0.8%	45	1.3%	18
PARK ROW	21	0.6%	40	1.1%	19
KIRKGATE	27	0.8%	34	1%	7
PARK ROW	21	0.6%	40	1.2%	19

These tables show the top streets 01/09/2015 – 31/08/2017 during the night time economy.

These tables clearly show that the Briggate and Call Lane areas are responsible for 34% of crime reported in the city in the last year. 16% of crime was reported in the other red area of Albion Street/Woodhouse Lane. This has not changed in the last year.

The police report conclusions were:

- Briggate, Call Lane, Albion Street and Woodhouse Lane are the top streets for offending in the night time economy for both examined periods. These streets are located within the two city centre cumulative impact area red areas, supporting the view that both red areas should be maintained.

### Red Area Comparisons

The stated crime figures and time analysis is taken from offences occurring within the red outlining square, between 18:00 – 05:59. Assaults, theft from person, theft non-specific, robbery and sexual offences have been included in this analysis.

#### Call Lane Red Area



<p>NTE: Year 2015 – 2016 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 420</li> <li>▪ Robbery: 27</li> <li>▪ Sexual Offences: 23</li> <li>▪ Theft From Person: 487</li> <li>▪ Theft Non Specific: 382</li> </ul> <p style="text-align: center;">Total: 1339</p> <p>Time Analysis: Peak Time: 00:00 – 05:00</p> <p>Risk days: Thursday, Friday, Saturday</p>	<p>NTE: Year 2016– 2017 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 495 (15% increase)</li> <li>▪ Robbery: 37 (27% increase)</li> <li>▪ Sexual Offences: 31 (16% increase)</li> <li>▪ Theft From Person: 472 (3% decrease)</li> <li>▪ Theft Non Specific: 422 (9% increase)</li> </ul> <p style="text-align: center;">Total: 1457 (8% increase)</p> <p>Time Analysis: Peak Time: 23:00 – 04:00</p> <p>Risk days: Thursday, Friday, Saturday, Sunday</p>
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Call Lane red area for the period 01/09/15 - 31/08/16 and 01/09/16 - 31/08/17

The police report conclusions were:

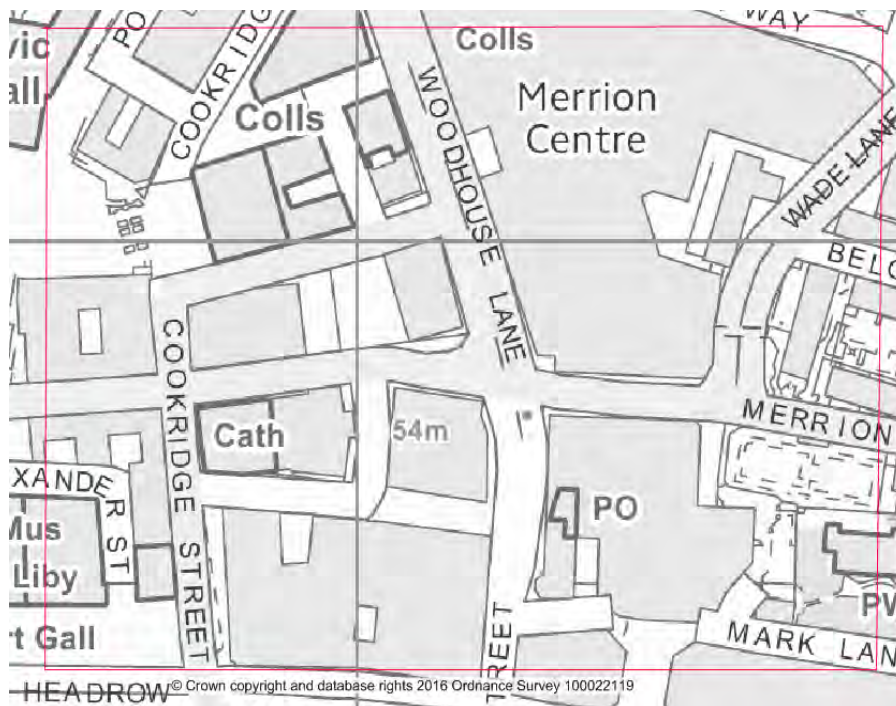
- The Call Lane red area remains the predominant hot-spot area. Geo-spatial analysis shows the main risk area within the city centre is the area of Call Lane and Briggate. The highest concentration of offences remains in this area and has slightly extended compared with the previous 12 months, but still falling within the existing designated area. The peak time for offending in the Call Lane area is now 23:00 - 04:00.
- Within the Call Lane area, all the examined offences namely Assaults, Robberies, Sexual Offences and Thefts have increased during 2016 and 2017 with Assaults, Robberies and Theft offences seeing the largest increase.

Not only have the overall crimes increased by 8%, the peak times have lengthened again this year to 11pm to 4am. The risk days have changed so that Saturday/Sunday is the highest with Thursday and Friday also high. Most worrying is the 15% increase in assault and 16% increase in sexual offences. This shows not only how important it is that the number of people using this area during the night time does not increase but that it would be desirable for the number of people using this area during peak hours to reduce. Therefore any change to the current licences, either new premises or any increase in the operation of the existing premises should not have the effect of increasing visitors to the area. Furthermore the council will be investigating ways in which assault and theft can be reduced, in liaison with the operators and agencies.

Any operator seeking a variation to their current licence must be mindful of the problems being experienced in the area and must ensure that the additional measures they offer will result in no impact on the licensing objectives. A responsible operator will always be seeking ways in which they can contribute to the efforts made to reduce the crime statistics, and would not be satisfied with merely maintaining the status quo.



Albion Street / Woodhouse Lane Red Area



<p>NTE: Year 2014 – 2015 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 225</li> <li>▪ Robbery: 3</li> <li>▪ Sexual Offences: 7</li> <li>▪ Theft From Person: 126</li> <li>▪ Theft Non Specific: 150</li> </ul> <p>Total: 511</p> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 00:00 – 04:00</li> <li>▪ Secondary peak: 23:00 – 00:00</li> </ul> <p>Risk days: Monday, Friday, Saturday</p>	<p>NTE: Year 2015 – 2016 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 251 (9% increase)</li> <li>▪ Robbery: 8 (63% increase)</li> <li>▪ Sexual Offences: 14 (100% increase)</li> <li>▪ Theft From Person: 151 (17% increase)</li> <li>▪ Theft Non Specific: 147 (2% decrease)</li> </ul> <p>Total: 514 (10% increase)</p> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 01:00 - 0300</li> <li>▪ Secondary : 23:00 – 04:00</li> </ul> <p>Risk days: Monday, Tuesday, Thursday</p>
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Map showing the Albion Street red area for 01/09/15 - 31/08/16 and 01/09/16 - 31/08/17

The police report conclusions were:

- Within the Albion Street / Woodhouse Lane Red area, the hot-spot areas have remained the same in both examined periods, specifically the bottom of Woodhouse Lane and top of Albion Street. During the period 2016 to 2017, the peak time is shown as between 01:00 – 03:00.

The licensing authority has received one application to lengthen hours in the last year which was granted at a licensing subcommittee hearing. However the overall 10% increase in crime and the lengthening of the peak hours is worrying.



As with the Call Lane/Lower Briggate area this shows not only how important it is that the number of people using this area during the night time does not increase but that it would be desirable for the number of people to reduce. Therefore any change to the current licences, either new premises or any increase in the operation of the existing premises should not have the effect of increasing visitors to the area.

Furthermore the council will be investigating ways in which assault and theft can be reduced, in liaison with the operators and agencies.

Cross Belgrave Street / Merrion Street / New Briggate:

The following area is not a designated 'red area' in the existing cumulative impact area; although, it has been noted as an emerging area of popularity during the 'Night Time Economy'.



<p>NTE: Year 2015 – 2016 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 108</li> <li>▪ Robbery: 8</li> <li>▪ Sexual Offences: 8</li> <li>▪ Theft From Person: 96</li> <li>▪ Theft Non Specific: 112</li> </ul> <p>Total: 332</p> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 01:00 – 04:00</li> <li>Secondary peak: 23:00 – 00:00 and 04:00 – 05:00</li> </ul> <p>Risk days: Thursday, Friday and Saturday</p>	<p>NTE: Year 2016 – 2017 (Sept – Aug)</p> <p>Crime:</p> <ul style="list-style-type: none"> <li>▪ Assault: 57 (47% decrease)</li> <li>▪ Robbery: 8 (no change)</li> <li>▪ Sexual Offences: 7 (12% decrease)</li> <li>▪ Theft From Person: 50 (48% decrease)</li> <li>▪ Theft Non Specific: 48 (59% decrease)</li> </ul> <p>Total: 170 (48% decrease)</p> <p>Time Analysis:</p> <ul style="list-style-type: none"> <li>▪ Peak: 00:00 – 04:00</li> <li>Secondary peak: 23:00 – 00:00 and 04:00 – 05:00</li> </ul> <p>Risk days: Friday and Saturday</p>
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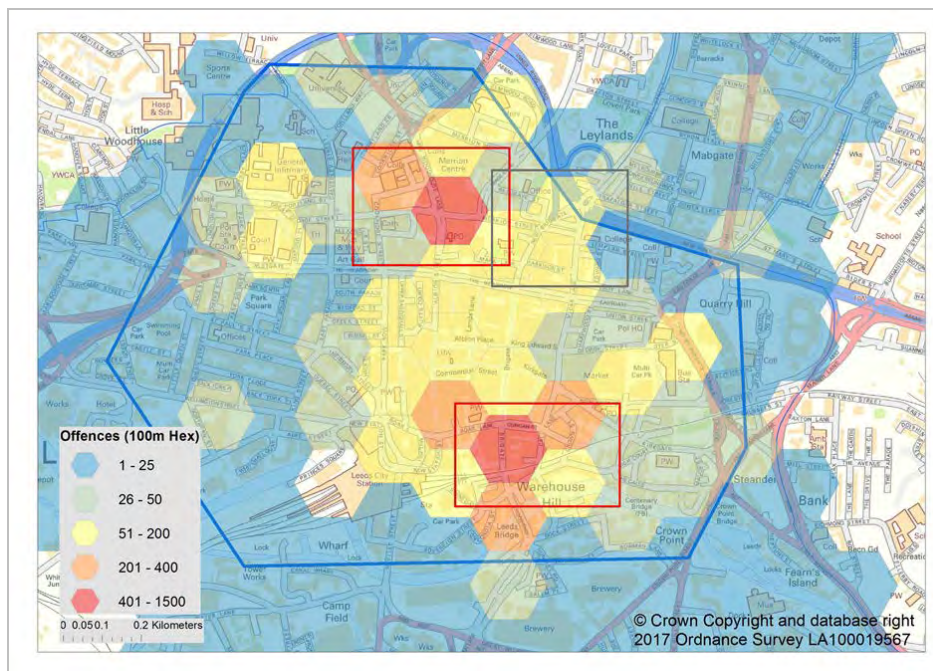
Map showing New Briggate area for the period 01/09/15 - 31/08/16 and 01/09/16 - 31/08/17

The police report conclusions were:

- The Cross Belgrave Street/Merrion Street/New Briggate areas were noted as an emerging area of concern for the period 2015 – 2016 however several associated offence types have seen reductions over the last 12 month period.

This area has seen a dramatic decrease in the number of reported crimes, meaning it is no longer an area of emerging concern. It now sits at the bottom of the table of Top 10 street names in the Police Report. As such, unless it appears as a hotspot in the future, this area sits in the amber area.

### City Centre Hotspots



This map shows the overall spread of night-time offences across the area. The 100m Hex grid shows that the main “hotspot” areas detailed previously (shown as red rectangles on the map) cover the main areas of concern, and that the “emerging” area identified previously (grey rectangle) is no longer covering a major offence hotspot. There are also no “new” areas of concern (that would be orange or red) outside the current localities.

### Road Traffic Incidents

The below table shows the breakdown of Road Traffic Incidents 01/09/2015 - 31/08/2017 in the city centre.

Incident Type	DTE		NTE	
	2015-2016	2016-2017	2015-2016	2016-2017
Highway Disruption	132	142	86	68
OPL	11	10	34	47
Road Related Offence	62	93	68	67
RTC - Damage Only	316	332	165	181
RTC - Serious Injury	8	14	6	6
RTC - Slight Injury	96	107	54	44
<b>Total</b>	<b>625</b>	<b>698</b>	<b>413</b>	<b>413</b>

## Day Time Economy – Top Streets

The below tables show the top ten streets and the top ten streets of increasing concern for road traffic incidents during the daytime economy.

Top Ten Street Names	2015 - 2016	2016 - 2017	Change
THE HEADROW	26	43	17
A58	26	40	14
WELLINGTON ST	26	37	11
A58(M)	21	31	10
INNER RING ROAD	25	30	5
GREAT GEORGE ST	17	29	12
WOODHOUSE LANE	22	24	2
CROWN POINT RD	17	23	6
ALBION STREET	15	22	7
CLAY PIT LANE	14	20	6

Top 10 Street Names Of Increasing Concern	2015 - 2016	2016 - 2017	Change
THE HEADROW	26	43	17
A58	26	40	14
WELLINGTON ST	26	37	11
A58(M)	21	31	10
GREAT GEORGE ST	17	29	12
ALBION ST	15	22	7
CLAY PIT LANE	14	20	6
A61	11	17	6
GEORGE ST	6	11	5
BOAR LANE	8	12	4

These tables show the top streets 01/09/2015 – 31/08/2017 or road traffic incidents during the day time economy.

The police report conclusions were:

- During the NTE the main hot-spots for Road Related Incidents were around The Headrow, Woodhouse Lane and Albion Street with a smaller concentration around Boar Lane and Wellington Street.

## Conclusion

The licensing authority conclusions are that the City Centre should remain as a cumulative impact area. The area should be altered to contract the area to mirror that shown in the heat map on page 17. The red zones to remain in place and reviewed annually by analysing the crime statistics provided by West Yorkshire Police, or by another reporting mechanism should the Police be unable to provide these statistical reports in the future.

The assessment in this area will relate to all applications whose licensable activities fall within the peak times as described in this assessment. Any application received which is located in the red zone can expect to receive representations from West Yorkshire Police and the Licensing Authority and applicants should give consideration to potential cumulative impact issues when setting out the steps that will be taken to promote the licensing objectives.

## Conclusion

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This cumulative impact assessment has been carried out in accordance with Section 5A of the Licensing Act 2003. The council intends to publish the cumulative impact assessment because it considers that the number of relevant authorisations in respect of premises in one or more parts of its area described in the assessment is such that it is likely that it would be inconsistent with the authority's duty to grant any further relevant authorisations in respect of premises in that part or those parts.

In order to identify the areas that should be included in this assessment, and the types of authorisations that the assessment should relate to, the council completed the following actions:

The council issued a Call for Evidence through the Licensing Enforcement Group which comprises of responsible authorities and other interested agencies. Following this call for evidence West Yorkshire Police provided crime statistical data for each of the existing cumulative impact areas.

A number of working groups met to discuss the individual areas that are being assessed. The outcome of these meetings, the analysis of the police crime statistics, licensing statistics and the use of the Licensing Matrix provided by Public Health has led to the following conclusions:

- City Centre – remove the green area, contract the amber area to the areas where the night time economy is the most active, change the scope of the cumulative impact area in the red zone to put emphasis on operation during peak hours.
- Headingley – split the Headingley cumulative impact area into two. One are to be focused on North Lane, removing the top and bottom of the Otley run, and a second area focused round Hyde Park and Brudenell but concentrating on late night refreshment and night time opening off licences.
- Woodhouse Corridor – to be removed
- Chapel Allerton and Horsforth – cumulative impact areas to be removed and replaced with Special Area Policies
- Armley – to remain as it is currently
- Harehills – to introduce Harehills Lane and Harehills Road as a cumulative impact area, based on crime and disorder, public nuisance and the protection of children from harm, due to the increase in off licensed premises and the increase in all crime over the last 12 months and the high proportion of violent crime.

The reason why the council is considering publishing a cumulative impact assessment is because the licensing objectives are being affected by the cumulative impact of licensed premises as indicated by the Police Statistical Report, the Alcohol Licensing Data Matrix and evidence provided by ward members, responsible authorities and residents:

- City Centre
- Headingley
- Hyde Park
- Armley
- Harehills

In general the assessment relates to both premises licences and club premises certificates unless expressly stated otherwise in the specific area assessment.

The council is required to consult upon this Cumulative Impact Assessment before publication, and this will be undertaken alongside the consultation for the Statement of Licensing Policy 2019-2023.