

Cumulative Impact Assessment 2018

Licensing Act 2003



Background

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 12th 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

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

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

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

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

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

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.

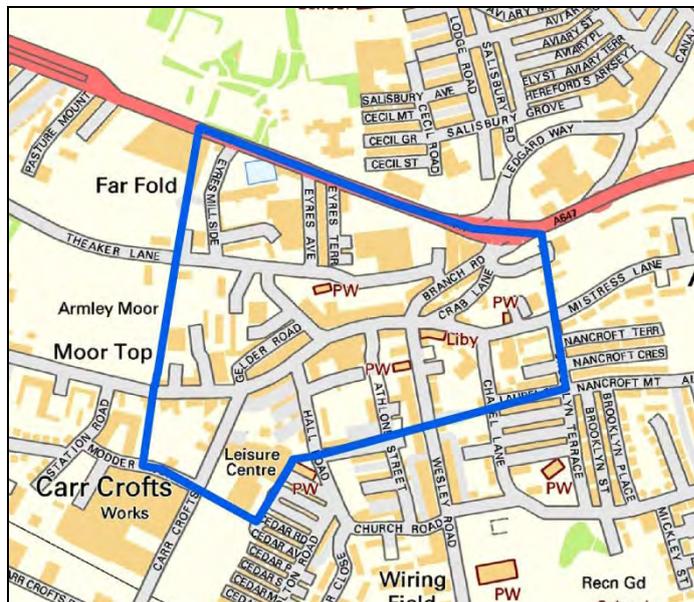
Police Statistical Data

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.

Armley

This area relates to the main shopping areas of Armley, known as Armley Town Street and Branch Road.



In recent years Armley has been highlighted due to levels of deprivation, poor health outcomes and, more recently, an increase of disorder in the main shopping areas.

In 2014 the council recognised this as an area that would benefit from Local Licensing Guidance due to poor health outcomes of people living in LS12. This gives potential businesses extra information about the problems in Armley and encourages new businesses to think about the impact they are having in the area.

In the last few years residents have reported to the local councillors and MP their concerns about large groups of mostly male street drinkers gathering on Town Street. Residents find this intimidating and have reported feeling that this area is becoming a no-go zone. West Yorkshire Police, Leeds Antisocial Behaviour Team and the council are working with these two groups to stop the antisocial behaviour and have issued injunctions to stop a number of people from coming back to Town Street.

In the cumulative impact area, by the end of 2016, there were a total of 12 premises licensed to sell alcohol for consumption off the premises (convenience stores, mini-markets and off licences) and 6 premises licensed to sell alcohol for consumption on the premises (pubs, bars and clubs).

At the same time licensed premises have increased reports of antisocial behaviour, disorder and domestic violence have also increased in the wider Armley area.

In areas where there is an excessive accumulation of on-licensed premises, it is easy to provide a direct correlation between those premises and crime and disorder in the area, through an analysis of the operating hours of the premises and the peak times for incidents and calls for service.

It is harder to provide a direct correlation between the accumulation of off licensed premises and disorder in the same way as people are not drinking on the premises where they purchased the alcohol, and may delay drinking the alcohol until they arrive at home.

However in this area there is an issue with people drinking on the street and causing disorder and anti-social behaviour issues. West Yorkshire Police have identified that smaller independently owned off licences in the area are selling strong and cheap alcohol popular with street drinkers as they are finding bottles and cans as litter that are only available in certain shops. However as the shops aren't committing any offences selling these products they would not be subject to enforcement action.

Common sense would denote that new off licensed premises opening in the area where street drinking and the associated anti-social behaviour is most problematic would add to the problems already being experienced in the area and this view is supported by officers from LASBT and West Yorkshire Police.

It is the council's policy, on receipt of relevant representations to refuse all applications (new and variation) for premises licences which authorise the sale of alcohol for consumption off the premises in the cumulative impact area. It is for the applicant to demonstrate that their application would not add to the cumulative impact of such licensed premises in the Armley area.

Evidence

Licensing Statistics

The number of off licences in the Armley area has steadily increased over the last ten years. This table show the number of licences issued as at 1st January each year.

		2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
LS12 Postcode	On	50	49	44	41	41	42	38	40	36	34	35
	Off	43	49	51	54	56	56	57	57	61	57	60
Armley Ward	On	27	27	24	23	25	24	23	24	20	19	18
	Off	30	31	34	37	38	38	37	38	41	39	40
Cumulative Impact Area	On	7	7	6	6	6	6	6	8	6	5	5
	Off	5	5	7	8	9	9	9	11	12	12	12

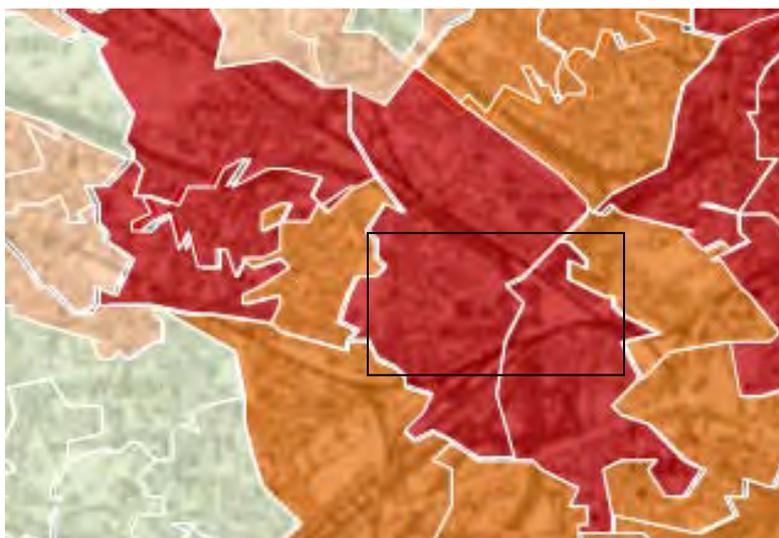
Since the cumulative impact area has been in place the council has received 3 applications for new premises licences and all 3 were refused.

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 Armley area. Dark red denotes the 15 highest ranked LSOAs, followed by dark orange, light orange and green being the lowest ranked LSOAs.



The council has reviewed 2 postcodes in the Armley area:

LS12 3AB – this is at the northern end of Town Street and includes Branch Road. It is within the Mistress Lane, Nancroft Lane, Brooklyns, Models LSOA. It is ranked 5th of all 482 LSOAs and is considered very high risk. This area is ranked highest in Leeds for the children not in education, employment or training. It also ranks high for alcohol related admissions to hospital (14th), density of off licences (6th), alcohol related antisocial behaviour (6th) and person seeking treatment for alcohol dependency (8th).

LS12 3HD – this is in the middle of Town Street. It is within the Carr Crofts, Cedars, Wesley Road LSOA. It is ranked 4th of all 482 LSOAs and is considered very high risk. This area is ranked highest in Leeds for the children not in education, employment or training. It also ranks high for alcohol related admissions to hospital (14th), density of off licences (6th), alcohol related antisocial behaviour (3rd) and person seeking treatment for alcohol dependency (14th).

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.

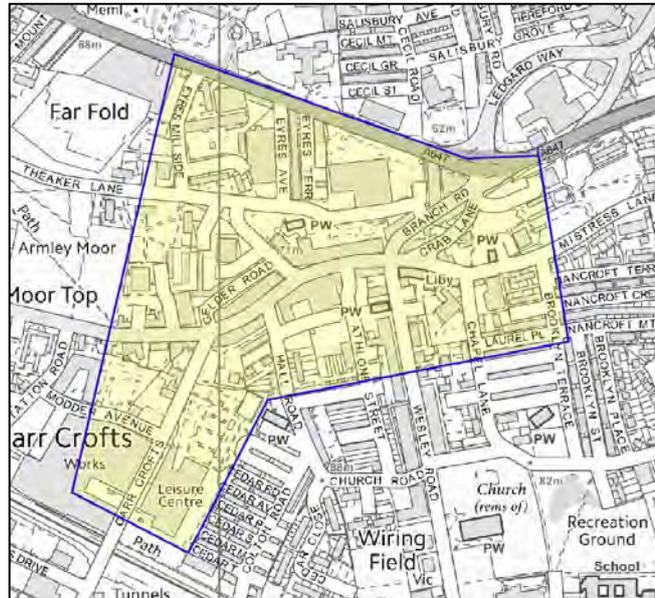
	LS12 3AB	LS12 3HD
	Top	Middle
Overall Ranking (out of 482)	5	4
Deprivation score	74	30
Alcohol specific hospital admissions - all ages	28	28
Alcohol related hospital admissions - all ages	14	14
Population aged 16 and under	60	116
Audit-C scoring >7 more units (GP recorded alcohol habit)	251	179
Looked After Children	45	45
NEET (Young people not in education, employment or training)	1	1
Youth offences	59	59
Education - % DID NOT achieve grade 9-5 in English and Maths	195	102
Alcohol Licensing - Off licensed premises density	6	6
Alcohol Licensing - On licensed premises density	29	34
Alcohol related Anti-Social Behaviour	6	3
Alcohol flagged total crime - excluding violent crime	36	26

Alcohol flagged violent crime	12	12
Drunk and disorderly or over prescribed limit	27	17
Clients who use alcohol services	8	14
Licensing risk scores	42	122

Police Report

West Yorkshire Police produce a statistical report titled “Armley CIP area: Analysis: Crime and Nuisance Related Calls for Service October 2012 to December 2017” dated 14th March 2018 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 has been commissioned to analyse crimes and nuisance incidents both alcohol related and non-alcohol related to support the continuation of the cumulative impact area. The report analyses crime and nuisance incidents for the period 01/10/2012 – 31/12/2017 on the area shown.



Summary

- During the examined period 01/10/2012 – 31/09/2017 total crime in the Armley ward has risen year on year; this was also the trend within the Armley cumulative impact area.
- Offences in the Armley cumulative impact area peaked during July 2015 and were lowest in January 2015. The average per month was 32 crimes. The largest increase was during Oct 2015 – Sep 2016 compared with the previous 12 months.
- Overall Shoplifting recorded the highest number of offences within the Armley cumulative impact area, followed by Violence without injury, Other Theft, Criminal Damage and Violence with injury. Shoplifting and Criminal Damage were the crime types that increased year on year.
- Overall Violence with injury and Violence without injury recorded the highest number of offences that were related to alcohol. The top two occurrence types were Assault and Domestic Crime. Assault on a person thereby occasioning them actual bodily harm recorded the highest number of offences followed Assault by beating. 109 crimes (5%) of crimes recorded were flagged as alcohol related. Alcohol related crimes peaked during October 2016 – September 2017.
- There were 139 (7%) crimes that were recorded at licensed premises within the cumulative impact area. The top two crimes types were Violence with injury and Violence without injury. Offences peaked during October 2014 – September 2015 and October 2015-September 2016.
- Analysis of the crime types generally linked to Licensed Premises namely, Violence with injury, Violence without injury, Public Order offences, Robbery, Other Theft and Theft from Person increased year on year. Overall for these crime types, the area of concern is in the vicinity of Town Street, followed by Theaker Lane.

- The peak time for Violence with injury and Violence without injury within the cumulative impact area was between 15:00 – 00:00. The most prevalent day was Saturday.
- Alcohol related crimes were centred on or in the vicinity of Town Street. Further offending was around Crab Lane, Theaker Lane and Burnsall Grange. The peak time was between 20:00 – 00:00. There was a smaller peak between midnight and 03:00. Saturday was the most prevalent day.
- There are concerns relating to the reliability of the alcohol related flag and the use of the flag when crimes are recorded. In the majority of other theft crimes, it was alcohol that had been stolen rather than being a contributory factor in the commission of the offence. On reviewing the data, it was also evident that not all offences involving the influence of alcohol was recorded with an alcohol related flag.
- The number of Nuisance related calls for services have fluctuated during the examined period, peaking during October 2016 – September 2017. Nuisance related calls peaked during August 2017.
- Alcohol related nuisance recorded the highest number Nuisance related calls, followed by Youth Nuisance. Alcohol related nuisance peaked during October 2013 – September 2014, then remained at similar levels during the last three year period. The main issue has been with street drinkers in the area of Town Street and Hall Road. These two streets contributed to 59% of all Alcohol related nuisance within the cumulative impact area.
- The number of domestic related calls for service have fluctuated during the examined period, peaking during October 2014- September 2015. Domestic Incidents (non-crime) were located mainly around Burnsall Grange, Wesley Road, Westerly Rise and Stocks Hill. 32% calls referred to the suspect/s being under the influence of ‘alcohol’, in ‘drink’ or ‘drunk’. Overall the peak time was 16:00 -22:00. Peak times for incidents where the offender was under the influence of ‘alcohol’, in ‘drink’ or ‘drunk’ were between 20:00 - 21:00 and 23:00 - 02:00.

Armley Ward

Year	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Oct 12 - Sep 13	222	225	214	240	172	210	184	253	251	221	239	236	2667
Oct 13 - Sep 14	225	243	245	218	218	275	211	219	227	233	271	271	2856
Oct 14 - Sep 15	241	288	280	274	219	273	310	321	348	353	314	299	3520
Oct 15 - Sep 16	293	382	352	403	321	359	333	375	391	411	391	410	4421
Oct 16 - Sep 17	448	393	432	473	377	385	385	425	385	393	347	366	4809
Total	1849	1937	1908	1608	1307	1502	1423	1593	1602	1611	1562	1582	19484

Crime in the Armley ward between October 2012 and December 2017

Armley cumulative impact area

Year	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Oct 12 - Sep 13	13	21	19	26	22	30	20	22	27	16	25	19	260
Oct 13 - Sep 14	21	28	26	24	19	30	22	28	32	21	23	26	300
Oct 14 - Sep 15	31	33	22	11	17	37	44	32	25	53	39	30	374
Oct 15 - Sep 16	26	40	36	45	51	50	25	42	43	50	43	42	493
Oct 16 - Sep 17	24	38	50	51	52	45	38	42	47	49	41	39	516
Total	158	186	182	157	161	192	149	166	174	189	171	156	2041

Crime in the Armley cumulative impact area between October 2012 and December 2017

	Oct 12-Sep 13	Change +/-	% Change	Oct 13-Sep 14	Change +/-	% Change	Oct 14-Sep 15	Change +/-	% Change	Oct 15-Sep 16	Change +/-	% Change	Oct 16-Sep 17
All Crime	260	40	15%	300	74	25%	374	119	32%	493	23	5%	516

Year on Year comparison per year (October to September period)

Year on Year Comparison

Crime Category	Oct 12-Sep 13	Change +/-	% Change	Oct 13-Sep 14	Change +/-	% Change	Oct 14-Sep 15	Change +/-	% Change	Oct 15-Sep 16	Change +/-	% Change	Oct 16-Sep 17	Total
Shoplifting	91	3	3%	94	26	28%	120	37	31%	157	5	3%	162	640
Violence Without Injury	14	10	71%	24	24	100%	48	-3	-6%	45	25	56%	70	213
Other Theft	34	2	6%	36	-6	-17%	30	17	57%	47	-18	-38%	29	189
Criminal Damage	27	2	7%	29	3	10%	32	7	22%	39	9	23%	48	185
Violence With Injury	17	7	41%	24	0	0%	24	26	108%	50	2	4%	52	178
Burglary - Business & Community	16	-1	-6%	15	-3	-20%	12	16	133%	28	9	32%	37	114
Public Order Offences	6	5	83%	11	9	82%	20	13	65%	33	-1	-3%	32	111
Theft From Motor Vehicle	14	0	0%	14	5	36%	19	3	16%	22	-4	-18%	18	92
Possession Of Drugs	10	-4	-40%	6	3	50%	9	-1	-11%	8	1	13%	9	42
Robbery	3	3	100%	6	2	33%	8	1	13%	9	-3	-33%	6	33
Theft From The Person	3	3	100%	6	6	100%	12	-9	-75%	3	3	100%	6	32
Burglary - Residential	2	1	50%	3	-2	-67%	1	12	1200%	13	-5	-38%	8	27
TOMV / TWOC	4	1	25%	5	-1	-20%	4	1	25%	5	0	0%	5	26
Sexual Offences	1	5	500%	6	0	0%	6	-4	-67%	2	6	300%	8	24
Vehicle Interference	0	4		4	-3	-75%	1	7	700%	8	-6	-75%	2	17
Possession Of Weapons	0	2		2	3	150%	5	-2	-40%	3	1	33%	4	16
Arson	4	-4	-100%	0	2		2	2	100%	4	1	25%	5	15
Trafficking In Controlled Drugs	1	-1	-100%	0	4		4	-2	-50%	2	0	0%	2	9
Rape	1	0	0%	1	0	0%	1	0	0%	1	1	100%	2	7
All Crimes	260	40	15%	300	74	25%	374	119	32%	493	23	5%	516	2041

Year on Year comparison of each crime type per year (October to September period)

Alcohol Related Crimes

Crime Category	Oct 12-Sep 13	Change +/-	% Change	Oct 13-Sep 14	Change +/-	% Change	Oct 14-Sep 15	Change +/-	% Change	Oct 15-Sep 16	Change +/-	% Change	Oct 16-Sep 17	Total
Violence With Injury	4	2	50%	6	3	50%	9	-5	-56%	4	4	100%	8	33
Violence Without Injury	3	4	133%	7	3	43%	10	-5	-50%	5	3	60%	8	33
Criminal Damage	2	3	150%	5	-5	-100%	0	5		5	-1	-20%	4	17
Public Order Offences	1	-1	-100%	0	3		3	-1	-33%	2	3	150%	5	12
Shoplifting	2	-1	-50%	1	0	0%	1	-1	-100%	0	1		1	5
Other Theft	1	-1	-100%	0	0		0	0		0	1		1	2
Robbery	0	1		1	-1	-100%	0	0		0	1		1	2
Burglary - Business And Community	0	0		0	0		0	1		1	-1	-100%	0	1
Burglary - Residential	0	0		0	0		0	0		0	1		1	1
Possession Of Weapons	0	0		0	0		0	0		0	1		1	1
Rape	0	0		0	0		0	1		1	-1	-100%	0	1
Sexual Offences	0	1		1	-1	-100%	0	0		0	0		0	1
Total	13	8	62%	21	2	10%	23	-5	-22%	18	12	67%	30	109

Year on Year comparison of alcohol related crimes per year. (October to September)

Licensed Premises

Crime Category	Oct 2012 - Sep 2013	Oct 2013 - Sep 2014	Oct 2014 - Sep 2015	Oct 2015 - Sep 2016	Oct 2016 - Sep 2017	Oct 2017 - Dec 2017	Total
Violence With Injury	6	4	8	11	12	4	45
Violence Without Injury	1	2	6	3	6	3	21
Other Theft	4	2	6	4		2	18
Burglary - Business & Community	2	1		6	5		14
Criminal Damage	3	2		4	4		13
Public Order Offences	3		2	4	2	1	12

Theft From The Person	1	1	1	1	1	1	6
Theft From Motor Vehicle			1	1	1		3
Arson				1	1		2
Tomv / Twoc			1		1		2
Possession Of Drugs					1		1
Trafficking In Controlled Drugs			1				1
Sexual Offences					1		1
Total	20	12	26	35	35	11	139

Crimes type that occurred at Licensed Premises between 01/10/2012 - 31/12/2017

During the five year period Shoplifting recorded the highest number of offences within the Armley cumulative impact area, followed by Violence without injury, Other Theft, Criminal Damage and Violence with injury. The largest increase was during October 2015 – September 2016 compared with the previous 12 months. Shoplifting and Criminal Damage were the crime types that increased year on year.

Overall Violence with injury and Violence without injury recorded the highest number of offences that were related to alcohol. 109 crimes (5%) of crimes recorded within the analysed area were flagged as alcohol related.

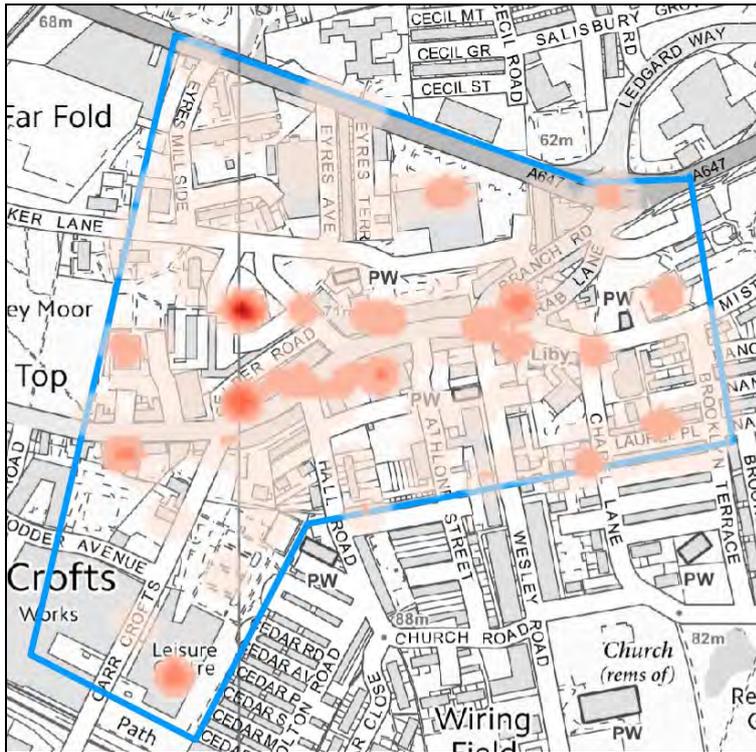
There were 139 (7%) crimes that were recorded at licensed premises within the cumulative impact area. The top two crimes types were Violence with injury and Violence without injury. Offences peaked during October 2014 – September 2015 and October 2015 – September 2016.

The crimes that may be linked to licensed premises are generally Violence with injury, Violence without injury, Public Order offences, Robbery, Other Theft and Theft from Person.

Crime Category	Oct 2012 - Sep 2013	Oct 2013 - Sep 2014	Oct 2014 - Sep 2015	Oct 2015 - Sep 2016	Oct 2016 - Sep 2017	Oct 2017 - Dec 2017	Total
Violence without injury	14	24	48	45	70	12	213
Other theft	34	36	30	47	29	13	189
Violence with injury	17	24	24	50	52	11	178
Public order offences	6	11	20	33	32	9	111
Robbery	3	6	8	9	6	1	33
Theft from the person	3	6	12	3	6	2	32
Total	77	107	142	187	195	48	756

Violent Crime, Robbery, Public Order Offences, Other Theft and Theft from Person per year

Hotspot mapping relating to Violent Crime, Public Order, Robberies, Other Theft and Theft from Person offences in the Armley cumulative impact area between 01/10/12 - 31/12/2017.



Overall offences were centred on or in the vicinity of Town Street and Theaker Lane.

Violent Crime was clustered around Town Street. Further offending was in the area of Burnsall Grange, Theaker Lane, Crab Lane and Branch Road. Within the crime type Violence with injury and Violence without injury, the top two occurrence types were Assault and Domestic Crime. Assault on a person thereby occasioning them actual bodily harm recorded the highest number of offences followed Assault by beating. The peak time for Violence with injury and Violence without injury was between 15:00 – 00:00. The most prevalent day was Saturday.

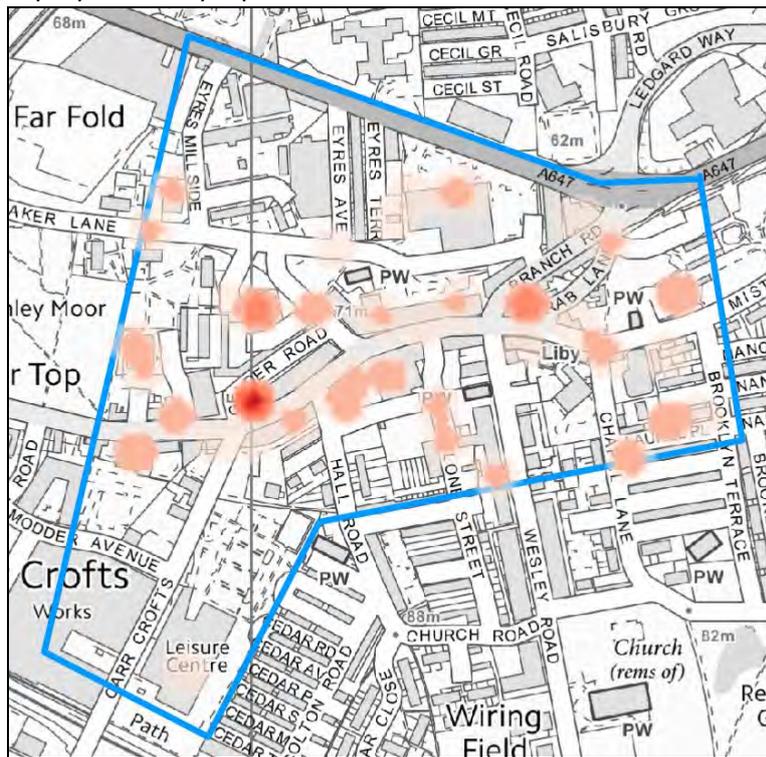
Other Theft offences were clustered around Town Street, Carr Crofts (Leisure Centre), Burnsall Grange and Stocks Hill. The peak time was between 12:00 – 16:00. Monday – Thursday were the risk days.

Theft from Person offences were primarily along Town Street and the most common MO was to ‘snatch’ or ‘grab’ the victim’s bag or mobile phone. The peak times were between 22:00 – 00:00 and 14:00 – 17:00. Friday, Saturday, Sunday and Monday were the risk days

Robberies were located mainly along Theaker Lane and Town Street. The peak times were between 15:00 - 17:00 and 00:00 - 03:00. Monday, Tuesday and Sunday were the risk days.

Public Order offences were predominantly on Town Street. The peak time for all Public Order offences were between 15:00 – 21:00. The most prevalent day was Saturday.

Hotspot mapping relating to alcohol related crimes in the Armley cumulative impact area between 01/10/2012 - 31/12/2017



Alcohol related crimes were centred on or in the vicinity of Town Street. Further offending was around Crab Lane Theaker Lane and Burnsall Grange. The peak time was between 20:00 – 00:00. There was a smaller peak between midnight and 03:00. Saturday was the most prevalent day.

The top two occurrence types were Assault and Domestic Crime. Assault a person thereby occasioning them actual bodily harm recorded the highest number of offences followed Assault by beating.

Calls for Service

Total calls for service in the Armley ward between 01/10/2012 - 31/12/2017

Year / Month	Total
Oct 12 - Sep 13	9,890
Oct 13 - Sep 14	10,837
Oct 14 - Sep 15	10,857
Oct 15 - Sep 16	11,302
Oct 16 - Sep 17	11,115

Total Calls for service within the Armley cumulative impact area

Year / Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Oct 12 - Sep 13	64	71	57	58	51	60	73	53	46	57	75	55	720
Oct 13 - Sep 14	52	71	54	54	55	60	64	56	71	68	87	77	769
Oct 14 - Sep 15	80	48	52	40	42	45	72	55	75	94	91	65	759
Oct 15 - Sep 16	101	69	59	69	49	62	68	68	61	74	79	83	842
Oct 16 - Sep 17	91	60	67	67	64	72	58	64	66	85	89	71	854

Total calls for service in the Armley cumulative impact area between 01/10/2012 - 31/12/2017

Nuisance Calls for Service (Disposition Codes 801, 802,803, 804, 805)

Year / Month	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Total
Oct 12 - Sep 13	15	10	7	9	7	9	12	12	6	10	12	9	118
Oct 13 - Sep 14	5	8	7	5	7	13	13	17	4	12	17	18	126
Oct 14 - Sep 15	6	6	6	4	2	2	6	2	16	18	17	11	96
Oct 15 - Sep 16	15	10	9	3	7	13	18	12	8	18	21	11	145
Oct 16 - Sep 17	17	7	15	6	7	12	13	11	16	21	30	15	170

The breakdown of Nuisance related calls by month between 01/10/2012 - 31/12/2017

Nuisance related calls for services have fluctuated during the examined period, peaking during October 2016 – September 2017. Nuisance related calls peaked during August 2017. Nuisance behaviour was the most recorded ASB type as shown the table below.

ASB Type	Oct 12 - Sep 13	Oct 13 - Sep 14	Oct 14 - Sep 15	Oct 15 - Sep 16	Oct 16 - Sep 17
Nuisance	93	100	83	125	154
Personal	15	18	12	12	12
Environment	8	5	1	8	3
Personal (Hate)	2	1			
Nuisance (Hate)		2			1
Total	118	126	96	145	170

Year on Year comparison of ASB related calls

ASB Qualifier	Oct 12 - Sep 13	Oct 13 - Sep 14	Oct 14 - Sep 15	Oct 15 - Sep 16	Oct 16 - Sep 17
Alcohol	33	64	51	54	50
Youth Related	33	25	18	39	63
Adult Nuisance - Non Alcohol Related	26	24	7	20	30
Neighbour Related	18	9	8	10	11
Nuisance Motorcycle/Quad Bike	1	1	6	11	8
Littering/Drugs Paraphernalia	4		3	6	3
Fireworks/Snowballing	2	1		4	2
Nuisance Car/Van	1	2	3	1	3
Total	118	126	96	145	170

ASB related calls broken down by qualifier

Alcohol related nuisance recorded the highest number of calls for service, followed by Youth Nuisance. Alcohol related nuisance peaked during October 2013 - September 2014, and then remained at similar levels during the last three year period. Youth related nuisance peaked during October 2016 – September 2017.

Alcohol Related Nuisance

The main issue has been with street drinkers in the area of Town Street and Hall Road. Town Street and Hall Road contributed to 59% of all Alcohol related nuisance within the cumulative impact area. There have been report of lone males causing a nuisance, being abusive and urinating in the street as well as groups of males and females. Groups of males and some females gather in the area to drink alcohol. Generally the groups are described as aged between 30 and 40 years old. The street drinkers become highly intoxicated, are aggressive to shop owners/customers and on occasions have been laid out on the floor outside businesses. The groups of drinkers sometimes become involved in verbal disagreements, resulting on occasions into violence. There have been safeguarding concerns with males in the road putting themselves and drivers at risk. The street drinkers were reported to put their alcohol into soft drinks bottles and coffee cups, due to the area being a designated non-drinking zone. There were also reports of fighting inside and outside licensed premises. Incidents occurred throughout the day and night time. The peak time was between 14:00 – 18:00.

Geo - Spatial Analysis: Nuisance

Area of concern for Nuisance Related calls for service in the Armley cumulative impact area between 01/10/12 - 31/12/2017

Within the Armley cumulative impact area, the main cluster of Nuisance related calls was centred on Town Street and Hall Road.

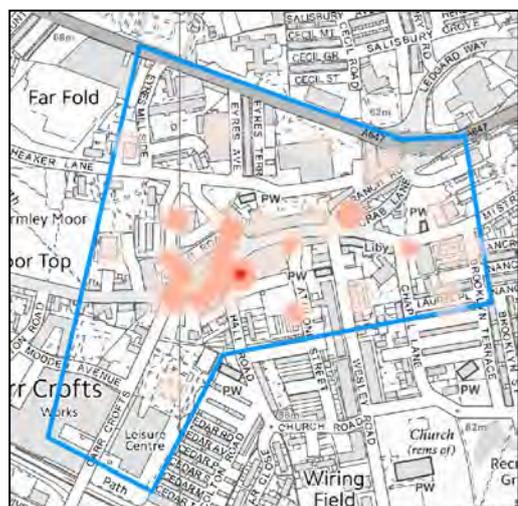
Alcohol related nuisance was the main issue (see below map) followed by Youth Nuisance. The peak time for all Nuisance related calls was between 16:00 – 21:00.



Area of concern for Alcohol related nuisance in the Armley cumulative impact area between 01/10/2012 - 31/12/2017

The main cluster for Alcohol related nuisance was in the vicinity of Town Street and Hall Road. The peak time in this area was between 14:00 – 17:00.

There was also a cluster around Crab Lane. On Crab Lane alcohol related nuisance occurred between 17:00 - 01:00, peaking between 20:00 - 00:00.

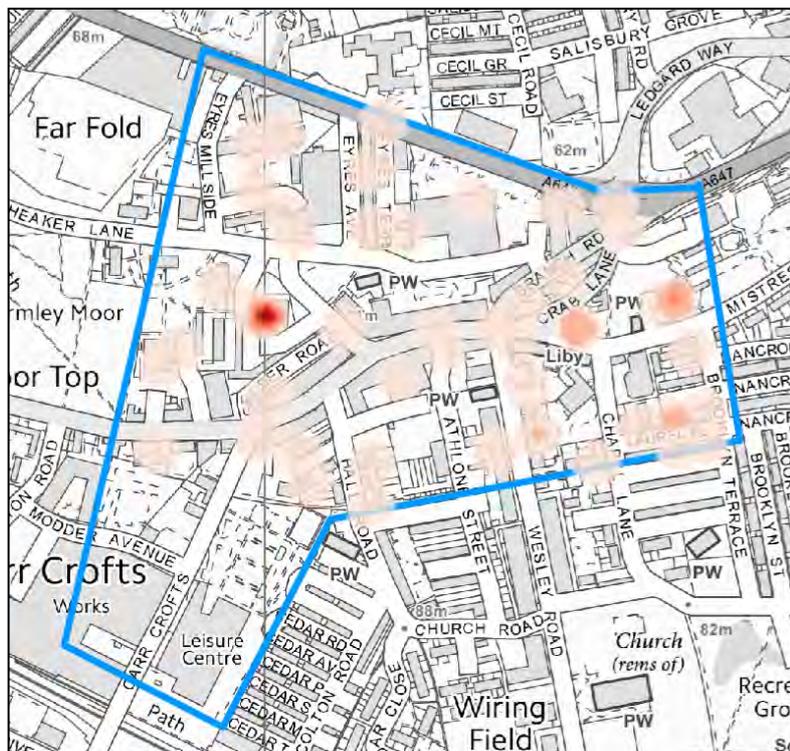


Domestic Incidents (Code 620 non crime) Incident Analysis

Incident Type	Oct 12 - Sep 13	Oct 13 - Sep 14	Oct 14 - Sep 15	Oct 15 - Sep 16	Oct 16 - Sep 17
DOMESTIC (NON CRIME)	33	32	38	22	27

The number of domestic related calls for service have fluctuated during the examined period. Incidents remained at similar levels during the first two year periods, then peaked during October 2014 - September 2015. Incidents were lowest during October 2015 – September 2016, then increased during October 2016 – September 2017. 32% calls referred to the suspect(s) being under the influence of ‘alcohol’, in ‘drink’ or ‘drunk’. Overall the peak time was between 16:00 -22:00. Peak times for incidents where the offender was under the influence of ‘alcohol’, in ‘drink’ or ‘drunk’ were between 20:00 - 21:00 and 23:00 – 02:00.

Hotspot mapping for Domestic Related incidents recorded in the Armley cumulative impact area between October 2012 and December 2017



Domestic Incidents (non-crime) were located mainly around Burnsall Grange, Wesley Road, Westerly Rise and Stocks Hill. The majority occurred at residential addresses. There were number of repeat addresses during the examined period. 5% were recorded at licensed premises within the cumulative impact area.

Conclusion

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.