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Please ask for/reply to: Michael Goddard

Your Ref:
Our Ref:
Date: 30 December 2020

Dear Stakeholder,

Consultation on Review of Cumulative Impact Zones within the London Borough of Croydon's Statement of Licensing Policy – Statutory Three Year Review Of Cumulative Impact Under Licensing Act 2003

In February 2018, the Council published its revised Statement of Licensing Policy under the Licensing Act 2003 ('the Act'). A copy of the current document can be found at: [\(link\)](#). I am writing to seek your views regarding a Statutory Review of the council's Cumulative Impact Zones within the current Statement of Licensing Policy. I should point out that the Council is not reviewing its Statement of Licensing Policy as yet, however part of the Statement of Licensing Policy provides details of four specific areas within the borough which have been identified as Cumulative Impact Zones, and it is on these zones we are seeking your views on cumulative impact as detailed below.

A licensing authority may publish a document ("a cumulative impact assessment") stating that the licensing authority considers that the number of relevant authorisations, (such as premises licenses) in respect of premises (all premises or of a particular type) 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 under the Licensing Act 2003 (Section 4(1)) to grant any further relevant authorisations in respect of premises in that part or those parts. A cumulative impact assessment must set out the evidence for the authority's opinion as set out in the cumulative impact assessment.

The four Cumulative Impact Zones (CIZ) in Croydon are areas where evidence has indicated that the number, type and density of licensed premises for off-sale consumption of alcohol (off sales) is having a detrimental impact on the licensing objectives.

The current Cumulative Impact Zones which include off licences, shops and supermarkets selling alcohol for consumption off the premises are as follows:

- I. Along the Brighton Road; South End; High Street, George Street corridor, from the Royal Oak Centre on Brighton Road, Purley to the junction of George Street and Cherry Orchard Road in Central Croydon
- II. Along the London Road/Streatham High Road corridor, in 3 sections; from the junction of London Road and Tamworth Road in West Croydon to the j/w Canterbury Road; from the j/w Broughton Road to the j/w Melrose Avenue and; from the j/w Northborough Road to the borough boundary with London Borough of Lambeth
- III. Along the Brigstock Road and High Street, Thornton Heath corridor, from the junction of Brigstock Road and London Road in Thornton Heath to the junction of High Street, Thornton Heath and Whitehorse Lane
- IV. Along the length of Central Parade, New Addington

Where the Licensing Authority has assessed cumulative impact and put cumulative impact zones in place, it has a responsibility to carry out a review of those zones every three years to assess whether cumulative impact remains an issue. If so, the authority must then produce and publish a Cumulative Impact Assessment. If the authority does not consider that such zones should be retained, it is required to publish a statement to that effect.

Ordinarily, throughout the course of 2020, the Council would have been gathering evidence about impacts of licensed premises in the borough which could either indicate there was the continued need for a cumulative impact assessment in the areas currently identified as cumulative impact zones, or indicate that there were no longer any issues with cumulative impact in those areas. Data gathered would also be used to assess whether or not cumulative impact presents an issue in any other areas in the borough, which could indicate a need for additional areas or types of premises to be included within the cumulative impact assessment.

Covid-19 measures required significant changes to people's behaviour during 2020 - business activity and people's movements have been restricted and disrupted. As a result, it is considered that any assessment of the effects of cumulative impact within the borough, and indeed any criminal and anti-social behavior linked to premises licensed for 'Off' sales, would not provide the accurate or robust data needed to determine whether cumulative impact is still an issue, or if any new areas should be considered.

The licensing authority must meet its statutory obligations to consider whether or not to retain existing CIZs. However, due to the impact Covid-19 has had on people's movements and behaviour in 2020, the Council, as licensing authority has decided to undertake a consultation on the proposal that we 'roll forward' our cumulative impact zones (and therefore the cumulative impact assessment). Under this proposal the council would carry out a comprehensive review at a later stage when there is a more accurate picture of whether or not cumulative impact remains an issue or has become an issue in other areas of the Borough.

Your response to this consultation will help the Council to undertake this consideration. The Council must review its overarching Statement of Licensing policy in 2022 and it will, at the same time review the cumulative impact areas within it. The Council will then produce a Cumulative Impact Assessment, if appropriate, or may decide to gather evidence and review cumulative impact separately, before that.

Please let us know your views on our proposal to “roll forward” Croydon’s four existing Cumulative Impact Zones. This consultation starts on 30 December 2020 and runs for seven weeks until 17 February 2021.

Before responding, you may find it helpful to read, in particular, paragraphs 4.17 – 4.36 and appendices 1-5 of the current Statement of Licensing Policy ([link](#)) which details the current CIZs and send us your comments on the proposal. **Please email your comments to licensing@croydon.gov.uk.**

To be taken into account, your comments need to be received by no later than **5pm on 17 February 2021**.

If you require this information in a different format, please contact the council’s licensing team on 020 8760 5466 or licensing@croydon.gov.uk .

Yours faithfully,

A handwritten signature in black ink, appearing to read "David Wood", with a long, sweeping underline that extends to the right.

Councillor David Wood
Cabinet Member for Communities, Safety & Resilience