

Report No.
ES20119

London Borough of Bromley

PART ONE - PUBLIC

Decision Maker: GENERAL PURPOSES AND LICENSING COMMITTEE

Date: 21th September 2021

Decision Type: Non-Urgent Non-Executive Key

Title: LICENSING ACT 2003 – AMMENDMENT TO THE STATEMENT OF LICENSING POLICY FOR 2021 TO 2026. CUMULATIVE IMPACT ASSESSMENT.

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Chief Officer: Colin Brand Director: Environment and Public Protection

Ward: All Wards

1. Reason for report

- 1.1 Section 5 of the Licensing Act 2003 requires a licensing authority to prepare and publish a statement of its licensing policy (SLP) at least every five years. During the five-year period, the policy must be kept under review and the licensing authority may make any revisions to it as it considers appropriate.
- 1.2 The draft SLP for Bromley Council was duly consulted on, and became effective on 7th January 2021, and will expire in January 2026. The SLP contains a Cumulative Impact Policy (CIP) that covers two areas, these being Beckenham and Bromley Town Centres. Government legislation in the form of the Policing and Crime Act 2017 changed, it now requires a Cumulative Impact Assessment (CIA) to be carried out to support any CIP that is contained within a Licensing Authority's SLP.
- 1.3 On 30th Sept 2020 the General Purposes and Licencing Committee (GP&LC) approved the Licensing Policy and with the CIPs in place and the CIA for consultation, to ascertain whether the evidence supported the retention, extension and or removal of the CIP within the SLP. This report outlines the response to the consultation on the draft CIA (Appendix A).

2. RECOMMENDATIONS

That the Committee

- 2.1 Consider the evidence received during the consultation
- 2.2 Approve the CIA, and retain the CIP for Beckenham and Bromley Town Centres within the Councils SLP 2021 to 2026 (option A section 3.10).
- 2.3 Authorise Officers to update the SLP accordingly.
- 2.4 Recommendation to Full Council of the decision taken by GP&L Committee

Impact on Vulnerable Adults and Children

1. Summary of Impact: This CIA is required to be undertaken to support any CIP in place within the borough boundaries. The Licensing Policy is required to be in place under the Licensing Act 2003. Within the Licensing Act 2003 it requires under section 4(2) specifically to promote 4 licensing objectives, one of which is the protection of children from harm.

Corporate Policy

1. Policy Status: Existing Policy:

The Council has adopted a statement of its licensing policy under the Licensing Act 2003 for the period 2021 to 2026, which remains valid until 7th January 2026

2. BBB Priority: Children and Young People Excellent Council Quality Environment Safe Bromley Vibrant, Thriving Town Centres Healthy Bromley Regeneration

Financial

1. Cost of proposal: No Cost
2. Ongoing costs: Non-Recurring Cost
3. Budget head/performance centre: Public Protection & Enforcement Portfolio Budget
4. Total current budget for this head: £
5. Source of funding: Revenue Budget

Personnel

1. Number of staff (current and additional): 1 Licensing Officer supported by 3.5 FTE admin support
2. If from existing staff resources, number of staff hours: Not applicable

Legal

1. Legal Requirement: Statutory Requirement: Section 5 (as amended) of the Licensing Act 2003 requires the Council as the Licensing Authority to determine and publish its policy every 5 years. Section 182 Guidance issued under the Licensing Act 2003 (revised 2018) requires the Licensing Authority at section 14.24 to consider publishing its CIA to support the CIP in place. Consultation was undertaken in accordance with section 5 of the Licensing Act 2003.
 2. Call-in: N/A
-

Procurement

1. Summary of Procurement Implications: Not applicable
-

Customer Impact

1. Estimated number of users/beneficiaries (current and projected): All businesses and organisations with the London Borough of Bromley that hold Licenses issued under the Licensing Act 2003, their customers and residents who live in close proximity.
-

Ward Councillor Views

2. Have Ward Councillors been asked for comments? YES. All Ward Members were notified and asked to comment on the policy prior to its adoption on 20th October 2021.

3. COMMENTARY

- 3.1 Bromley Council has included a special policy of Cumulative Impact (CIP) within its Statement of Licensing Policy (SLP) since 2003, that covers 2 areas, these being Beckenham and Bromley Town Centres.
- 3.2 These were introduced following evidence provided by the Metropolitan Police, which demonstrated that were adversely affected by an increase in crime, disorder and antisocial behaviour due to a large number of licensed premises being concentrated within these areas.
- 3.3 Cumulative impact is the potential impact that a significant number of licensed premises concentrated in one area, can have on the promotion of the licensing objectives. Where an application is made for a licensed premises within an area covered by a CIP, and the application is subject to representations, then it is the policy of the Council to refuse a licence where it determines that by granting the application it would contribute to the cumulative impact on the area. Licensed premises are any premises authorised by a Premises licence or Club Premises Certificate to carry on any licensable activity, including the sale of alcohol for consumption on and off the premises, and the provision of late-night refreshment.
- 3.4 A CIP is not a means of automatic refusal to grant or vary a licence. When an application for a new license (or a variation) is received for a premises that is located within an area covered by a CIP, and if a valid representation is received, it then becomes the applicant's responsibility to prove how their application for a new or varied licence will not adversely impact on the licensing objectives in respect of the Night Time Economy cover by the CIP's. As such, there is

a rebuttable presumption that any new applications, or applications to substantially alter existing permissions, will be refused unless the applicant can demonstrate to the Authority that the proposals will not add to the existing problems in the area

- 3.5 The existing Cumulative Impact areas are detailed at Appendix A
- 3.6 The introduction of the Cumulative Impact Assessment (CIA) was formally added to the Licensing Act 2003 (LA2003) by the Policing and Crime Act 2017 (PACA2017), with effect from 6 April 2018. Due to this recent amendment to the LA2003 Act, the Council, as the Licensing Authority, must look to review the CIA Policy every 3 years to ensure all evidence is relevant to the current issues.
- 3.7 Whilst the data available supported the retention of the CIP at the time of the review of the SLP, the formal production of the CIA was delayed as result of the Covid Pandemic, as officers who ordinarily would undertake this work, were redeployed to deliver to COVID enforcement functions. The CIA has now been completed, and this report presents the results, which formally support the decision of full Council taken on 20th October 2020 to adopt the current SLP 2021 to 2026, which included a CIP covering Beckenham and Bromley Town Centres.

Consultation of the Assessment

- 3.8 In preparing this CIA, consultation took place between October 2020 and April 2021; consideration of the retention of the existing CIP areas formed a part of the consultation on the wider policy and respondents were asked specifically whether the Cumulative Impact Area should remain, be expanded, contracted or removed. As part of the consultation, the Council is required by the LA2003 to consult the following groups of people:
- Representatives of local business
 - Local residents and their representatives
 - Representatives of local Premises Licence holders
 - Representatives of local Club Certificate holders
 - Representatives of local Personal Licence holders
 - Local licensing solicitors
 - Charitable organisations that deal with the social impact of alcohol misuse
 - The Responsible Authorities namely:
 - Metropolitan Police
 - London Fire Brigade
 - Environmental Health
 - Health & Safety
 - Safeguarding Children & Adults
 - Planning
 - Director of Public Health
 - Trading Standards
 - Home Office (Immigration Services)

Consultation Outcome

- 3.9 There were no responses relating to the CIPs in place. The responsible authorities, who supplied data in the production of this assessment were all in favour of retaining the existing Cumulative Impact Areas. As such, no amendments to the CIP were made. (See Appendix A Executive Summary)

Options

- 3.10 The Licensing Authority is required to consider the evidence received during the consultation and reach its determination. After considering the evidence, the Authority may determine to
- A. Keep existing Cumulative Impact Areas without the need for amendment.
 - B. Increase an existing Cumulative Impact Area or create a new one based on the evidence and define the location accordingly
 - C. Reduce an existing Cumulative Impact Area and specify which streets are no longer subject to cumulative impact and the reasons why
 - D. Determine that an entire Cumulative Impact Area is no longer required and provide reasons for this opinion.

Chosen Open

- 3.11 As all responses supported the retention of the CIP without any extension, the preferred option is 'A'.

Next Steps

- 3.12 The Decision of GP&L to support the recommendation at "A" would then be passed to Full Council to agree the amendment of the current Licensing Policy to include this CIA.

4 IMPACT ON VULNERABLE ADULTS AND CHILDREN

- 4.1 The Licensing regime provides for additional controls through specific permissions to undertake activities. Both the Licensing Act 2003 and Gambling Act 2005 contain licensing objectives which seek to protect particular vulnerable groups. In the case of the Licensing Act 2003, there is a specific licensing objective that seeks to protect children from harm whereas the licensing objectives under the Gambling Act 2005 are wider and seek to protect children and vulnerable adults from being harmed or exploited.
- 4.2 Businesses and the Council are required to promote these objectives in the way they operate or make decisions.
- 4.3 Details of applications under both Acts are referred to the appropriate safeguarding teams for comment.

5 POLICY IMPLICATIONS

- 5.1 Both the Licensing Act 2003 and the Gambling Act 2005 require the Council to prepare, consult on and publish statements of their licensing policy. These must be reviewed at least every 5 years under the Licensing Act and 3 years under the Gambling Act.
- 5.2 Members should make decisions in accordance with these policies but are free to depart from them with good reason.

6 FINANCIAL & LEGAL IMPLICATIONS

- 6.1 The Council is required to prepare and publish a statement of its Licensing Policy for a period of 5 years This was completed and agreed on the 12th October 202 and became effective from 7th January 2021 to 7th January 2026.

Non-Applicable Sections:	Personnel and Procurement implications
Background Documents: (Access via Contact Officer)	Soft File Computer based records

Appendix A

Cumulative Impact Assessment

London Borough of Bromley

Statement of Licensing Policy

2021-26

Cumulative Impact Assessment

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1 Executive Summary

2 Background

1. This cumulative impact assessment (CIA) was undertaken alongside the London Borough of Bromley's *Statement of Licensing Policy 2021-2026*.
2. Cumulative impact is a proper matter that a licensing authority (Bromley Council in this case) can consider under the *Licensing Act 2003* and its accompanying *Guidance (Section 182, revised 2018)*. Cumulative impact is best summarised as

An area where a concentration of licensed premises, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the prevention of crime and disorder, public safety, the prevention of nuisance and the protection of children from harm.
3. Under the Policing and Crime Act 2017, cumulative impact policies were put on a statutory footing (not simply as a reference in the S182 Guidance) and the duty to undertake a cumulative impact assessment made a legal requirement should a licensing authority seek to introduce or retain a cumulative impact policy.

3 Findings – Licensed premises

4. There are 901 licensed premises in the borough. Of these, a disproportionately large amount, 97 and 64 respectively, are located in the Bromley and Beckenham CIP areas.
5. The borough is approximately 152km² in size. The Bromley CIP area is approximately 0.6km² and the Beckenham CIP area is approximately 0.2km². This means the average density of licenees is 5 per km² across the borough. In Bromley CIZ area the density is 159 per km². and in Beckenham it is 305 per km². There is significant accumulation of premises in these two CIP areas.

4 Findings – Crime & disorder and public nuisance

6. Overall, crime and disorder and public nuisance recorded on the Metropolitan Police recording system are much higher in the two town wards (*Bromley Town* and *Copers Cope* in Beckenham) which contain the two CIP areas than the borough average.
7. **Serious violent and sexual crimes** are, respectively, 4x and 2x higher per km² in Bromley and Beckenham town centre wards than the borough average.
8. Recorded **drugs crimes** are, respectively, 10x and 2x higher per km² in Bromley and Beckenham town centre wards than the borough average.
9. Recorded **robberies** are, respectively, up to 12x and 3x higher per km² in Bromley and Beckenham town centre wards than the borough average.
10. Recorded **theft from the person** are, respectively, up to 24x and 3x higher per km² in Bromley and Beckenham town centre wards than the borough average.

11. Recorded **public order offences** are, respectively, up to 6x and 2x higher per km² in Bromley and Beckenham town centre wards than the borough average.
12. Recorded **antisocial behaviour public nuisances** are, respectively, up to 6x and 3x higher per km² in Bromley and Beckenham town centre wards than the borough average.
13. In terms of **alcohol related violent crime**, Bromley Town Centre ward has the highest number of incidents of the borough's 22 wards. Beckenham is fifth.
14. Between March 2019 and February 2021, the borough average was 2.5 **alcohol related violent crimes** per km². However, in Bromley Town ward the rate of alcohol-related violent crimes per is 15 per km². In Beckenham it was 8 per km². This is 6x and 3x the borough average respectively.
15. In both town centres, the number of alcohol-related violent crime incidents fell substantially between March 2020 and February 2021 when much of the night-time economy was shuttered for most of this period.

5 Findings – CCTV data

16. CCTV camera data for 2018-2020 was analysed for Bromley Town Centre and Beckenham Town Centre.
17. In 2019 there were **2,063 recorded incidents in Bromley town centre**. Of these, 60% took place in the night-time hours and 41% could be linked to customers of licensed premises, the night-time economy, alcohol consumption, drug dealing, or begging associated with licensed premises.
18. In 2020 however, when much of the night-time economy was shuttered by Covid regulations for the majority of March to December, whilst the overall number of incidents in Bromley Town Centre rose from 2,063 to 3,621, the number of cumulative impact-related incidents fell to 440 (from 840 in 2019). This is a significant reduction in cumulative impact incidents when the night-time economy was closed.
19. This trend was mirrored in Beckenham where cumulative impact-related incidents fell by 50% - from 282 in 2019 to 141 in 2020.

6 Findings – London Ambulance Service callouts

20. Over the past four years, Bromley Town Centre ward (in which the CIP area sits) received 9x the borough average of **assault** callouts in the night-time economy per km². In Beckenham it was 7x the borough average.
21. In the Bromley Town ward ambulance call outs for **alcohol related** incidents were 8x the borough average per km². In Beckenham it was 4x the borough average.

7 Findings – Noise nuisance

22. **Noise in the street** complaints to the council by ward between 2018-21 showed that Bromley and Beckenham town centre wards and are ranked 1 and 2 respectively out of the 22 wards, albeit numbers are small.

8 Findings – Residents’ survey

23. Analysis was undertaken of the most recent annual residents’ survey of those questions which are linked to the presence and clustering of night-time or licensed premises, such as, **sexual crime, robbery, begging, groups loitering** and **drug use**. Residents of Bromley Town CIP area were *more likely* than the borough as a whole to say that these crimes or nuisance were a *fairly big* or *very big* problem locally. This was also true for **alcohol-related disorder** for residents within the Bromley Town CIP area than the borough average.
24. The number of respondents from Beckenham CIP area was too small to analyse.

9 Findings – Public health

25. Overall, the public health data is too general to pinpoint exact outcomes, but it does show that Bromley and Beckenham town wards both have higher than average alcohol-related negative indicators, such as harmful and hazardous drinking and hospital admissions.

10 Conclusion

26. Overall, there is a strong link between the high density clustering of premises in the two existing CIP areas of Bromley and Beckenham town centres and the presence of much higher than borough average levels of **crime and disorder** and **public nuisance**. Residents in Bromley CIP area also have greater than average concerns about **crime and disorder, public nuisance** and **public safety**. More research is required on the **protection of children from harm**.

11 Background

12 What is cumulative impact?

27. 'Cumulative impact', as defined by the S182 Guidance issued under the Licensing Act 2003 (revised 2018) is best summarised as follows: an area where a concentration of licensed venues, however small in number or well managed individually, causes problems or 'cumulative impact' beyond their immediate premises. In doing so, their impact must compromise one or more of the four licensing objectives, which are: the *prevention of crime and disorder, public safety*, the *prevention of public nuisance* and the *protection of children from harm*.
28. Examples of cumulative impact can be burdens on public transport, the police and cleansing teams or increases in crime or nuisance that impacts upon other public space users, deters non-users or affects residents or businesses.
29. The exact wording from the *Section 182 Guidance* (revised 2018) is shown below.

- 14.20 The concept of "Cumulative impact" has been described within this guidance and used by licensing authorities within their statements of licensing policy since the commencement of the 2003 Act. 'Cumulative impact assessments' were introduced in the 2003 Act by the Policing and Crime Act 2017, with effect from 6 April 2018. Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area.
- 14.21 In some areas where the number, type or density of licensed premises, such as those selling alcohol or providing late night refreshment, is high or exceptional, serious problems of nuisance and disorder may arise outside or some distance from those premises. Such problems generally occur as a result of large numbers of drinkers being concentrated in an area, for example when leaving premises at peak times or when queuing at fast food outlets or for public transport.
- 14.22 Queuing in itself may lead to conflict, disorder and anti-social behaviour. Moreover, large concentrations of people may also attract criminal activities such as drug dealing, pick pocketing and street robbery. Local services such as public transport, public lavatory provision and street cleaning may not be able to meet the demand posed by such concentrations of drinkers leading to issues such as street fouling, littering, traffic and public nuisance caused by concentrations of people who cannot be effectively dispersed quickly.
- 14.23 Variable licensing hours may facilitate a more gradual dispersal of customers from premises. However, in some cases, the impact on surrounding areas of the behaviour of the customers of all premises taken together will be greater than the impact of customers of individual premises. These conditions are more likely to arise in town and city centres, but may also arise in other urban centres and the suburbs, for example on smaller high streets with high concentrations of licensed premises.

30. If the Council (which is also the licensing authority) is satisfied that there is cumulative impact, i.e., problems that cannot be dealt with at the individual premises level, it may introduce a cumulative impact policy (CIP) which is an area (or Cumulative Impact Policy area) with boundaries. In this area it then becomes the applicant's responsibility to prove how their application for a new or varied licence *won't* impact on the licensing objectives. This is a reversal of the usual principle where a responsible authority, such as the council,

police or community, has to prove that a new or varied licence *will* cause problems. It is sometimes known as the 'rebuttal presumption'.

31. Since 2018 it has been a requirement under the law for councils to review any cumulative impact areas at least every three years and to prepare a Cumulative Impact Assessment (CIA), i.e., evidence base, to support any retained or expanded CIP area. This document fulfils that purpose.

13 What is a cumulative impact assessment?

32. Below is the exact wording from the *Section 182 Guidance* (revised 2018) regarding the cumulative impact assessment.

14.24 A cumulative impact assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area.

14.25 Section 5A of the 2003 Act sets out what a licensing authority needs to do in order to publish a CIA and review it, including the requirement to consult with the persons listed in section 5(3) of the 2003 Act. The 2003 Act does not stipulate how the CIA should be used once published, because the requirements for determining applications for new licences or variations are the same in areas with a CIA as they are elsewhere, as set out in sections 18, 35, 72 and 85 of the Act. However, any CIA published by a licensing authority must be summarised in its statement of licensing policy. Under section 5(6D) a

licensing authority must also have regard to any CIA it has published when determining or revising its statement of licensing policy.

14.26 The CIA must include a statement saying that the licensing authority considers that the number of premises licences and/or club premises certificates in one or more parts of the area described is such that it is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives. As part of the publication a licensing authority must set out the evidential basis for its opinion.

14.27 CIAs may relate to premises licensed to carry on any licensable activity, including the sale of alcohol for consumption on or off the premises, and the provision of late night refreshment. This includes late night refreshment providers which are not licensed to sell alcohol. A CIA may relate to all premises licences and club premises certificates in the area described in the assessment or parts thereof, or only to premises of a particular kind described in the assessment. For example, it may be appropriate for the licensing authority to only include off-licences or nightclubs within the scope of its assessment. The licensing authority must make clear, when publishing its CIA, which premises types it applies to. CIAs do not apply to TENs; however it is open to the police and environmental health authority (as relevant persons) to refer to evidence published within a CIA when objecting to a TEN.

14.28 While the evidence underpinning the publication of a CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions, it does not change the fundamental way that decisions are made under the 2003 Act. Each decision in an area subject to a CIA therefore still needs to be made on a case-by-case basis and with a view to what is appropriate for the promotion of the licensing objectives. Importantly, the publication of a CIA would not remove a licensing authority's discretion to grant applications for new licences or applications to vary existing licences, where the authority considers this to be appropriate in the light of the individual circumstances of the case.

14 Methodology

33. The methodological approach to each type of data is shown at the start of each section. The S182 *Guidance* suggests the following sources of data be considered as part of the cumulative impact assessment.

- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
- statistics on local anti-social behaviour offences;
- health-related statistics such as alcohol-related emergency attendances and hospital admissions;
- environmental health complaints, particularly in relation to litter and noise;
- complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
- residents' questionnaires;
- evidence from local and parish councillors; and
- evidence obtained through local consultation.

34.

14 Findings: Licensed premises data

15 Background

35. There are 901 licenced premises (including club premises certificates) in Bromley borough
36. This does not include gambling premises (unless they have an alcohol or entertainment licence, e.g., a casino). Likewise, food premises, unless they have an alcohol or entertainment licence, are not included. In the case of takeaways, these are only classed as a licensed premise if they have a late-night refreshment licence (LNR).
37. The total also includes all off-licences, but does not duplicate the on-premises licence of, for example, a pub that has the ability to offer off-sales.

16 Findings

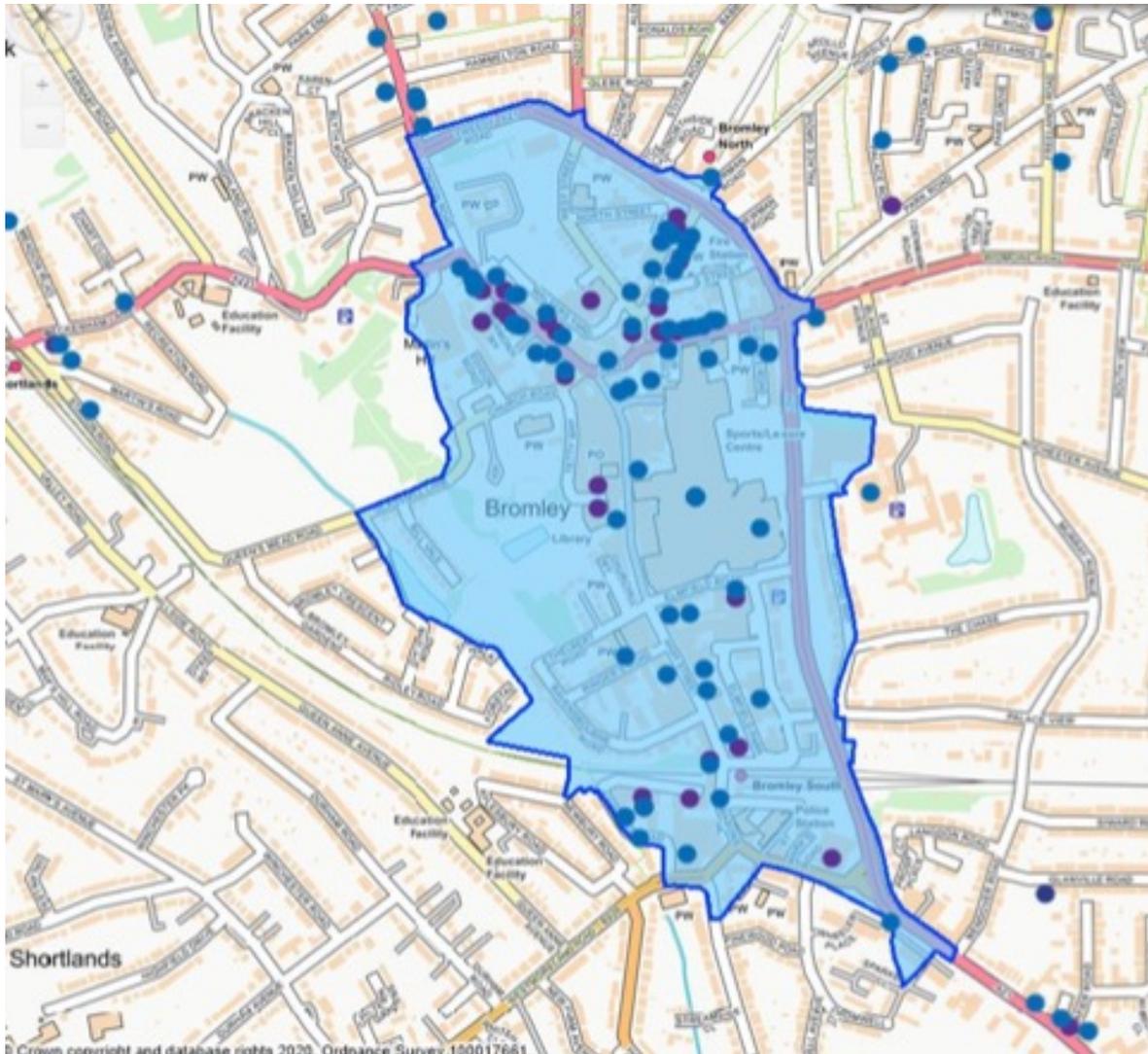
Figure 1 Number and type of premises in Bromley and Beckenham CIPs

Operational Type	Bromley CIP Premises	Bromley CIP %	Beckenham CIP Premises	Beckenham CIP %
Cinema/ theatre	4	4%	1	2%
Hotel	1	1%	0	0%
Late Night Refreshment	5	5%	3	5%
Nightclub	2	2%	2	3%
Off-licence	14	14%	13	20%
Other	5	5%	1	2%
Pub or Bar	14	14%	7	11%
Café-restaurant	45	46%	36	56%
Retailer	6	6%	0	0%
Sports / leisure club	1	1%	1	2%
Total	97	100%	64	100%

38. There are 97 physical licensed premises in Bromley and 64 in Beckenham.
39. The main differences between the two locations (beyond Bromley having around 52% more premises than Beckenham) is that Beckenham has a greater % of off-licences (20% vs 14%) and a higher proportion of cafes and restaurants (56% vs 46%). This is largely due to the number of 'other' and non off-licence retailers with alcohol licences in Bromley.
40. Relative to other borough's CIP zones of similar sizes, both towns have relatively few late night refreshment / takeaway premises but do have higher numbers of cafés and restaurants. The number of nightclubs and pubs / bars is fairly typical for these size town centres in outer London.
41. Below are maps showing the locations of the licensed premises within each town centre CIZ and the hinterland for context.

- 42. Due to the density of premises in both towns, some indicators are 'stacked' on top of each other due to the mapping software.
- 43. The blue indicators shows new licences, and the purple indicators show premises with recent minor variations.

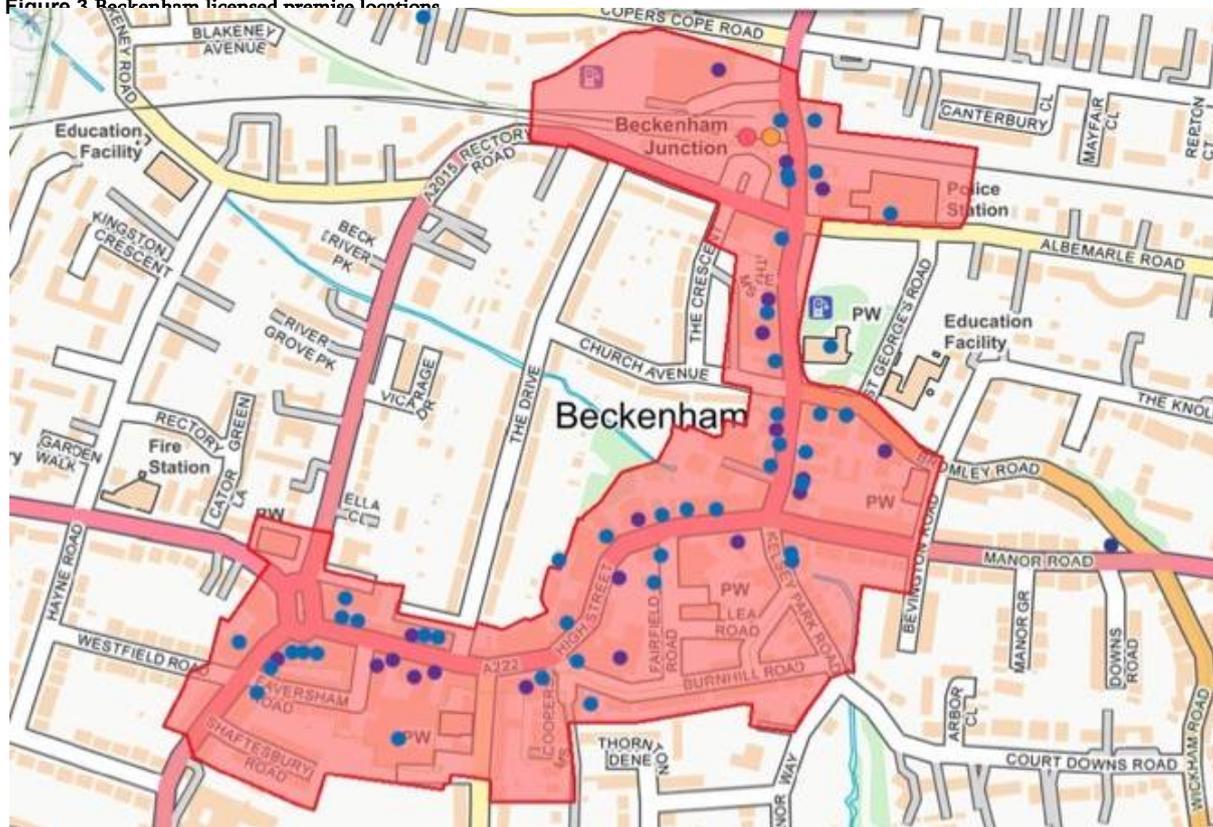
Figure 2 Bromley licensed premise locations



- 44. The majority of Bromley's licensed premises are located in a large cluster to the north of the town centre on East Street, West Street, the High Street (north) and the Market Square. There is a relatively empty area in the retail heart of the town and a smaller cluster to the south of the town around Bromley South rail station.
- 45. The map makes immediately apparent the large number of premises within the CIP and the boundary provides a natural fit with those premises. Outside of the CIP the number and density of premises drops off rapidly.

46. In future iterations, when Metropolitan Police analysts are available, more precise hotspot analysis within the CIP would be helpful. It is highly probable that the elevated levels of crime, disorder and nuisance are linked to the clusters of the licensed premises, but this iteration of the CIP study cannot categorically evidence this.

Figure 3 Beckenham licensed premise locations



47. Beckenham's licensed premises are spread more evenly throughout the town centre than those of Bromley with small clusters around Beckenham Junction Station, the central High Street and the western end of the High Street where it meets the War Memorial roundabout.
48. As with Bromley, the map makes immediately apparent the large number of premises within the CIP and the boundary provides a natural fit with those premises. Outside of the CIP the presence of premises drops off almost entirely (2 premises only). This is even more stark a contrast than with Bromley.

17 Comparative premises density

49. To understand premises density across the borough vs the two cumulative impact zones the size of each area was measured and factored against the number of premises within that footprint.

Figure 4 Comparative premises density

	Bromley Borough	Bromley CIP	Beckenham CIP
Number of premises	901	97	64
Area km sq	150.2	0.61	0.21
Premises per km sq	6	159	305

50. The densities are hugely different within the CIP areas to the borough as a whole.

51. The borough premises density is 6 licences per km². Bromley CIP area has 27 times this density of premises per unit of area and Beckenham is 51 times this licence density. Licence density alone is not the only indicator of cumulative impact, but it is a pre-requisite.

18 Findings: Observational fieldwork

19 Background

52. Due to Covid restrictions during the research period, it was not possible undertake observational fieldwork to catalogue incidents over a series of representative nights (usually this would be around 12 to 18 days and nights). It is recommended that this is undertaken for the 2024 CIA.
53. However, site visits were made on two weekend days and nights in June when the town was partially opened (no nightclubs or vertical drinking was operational). The purpose was for the researchers to understand how the two towns work in terms of passenger flow, licensed venue clustering, urban design, CCTV coverage and residential proximity. Images with notes are shown below.

20 Observations - Beckenham

Figure 5 Adjacent to the Beckenham War Memorial roundabout licensed cluster are a large number of residential streets and routes home from the town centre



Figure 6 Tangential residential streets and routes home are a regular feature along the High Street



Figure 7 Numerous parts of Beckenham High Street suffer from narrow pavements and pinchpoints which are not suited to a busy night-time economy and where licensed venues disgorge directly onto the pavements



Figure 8 Sections of Beckenham High Street have benefitted from temporary pavements widening during the pandemic by removing parking. If made permanent this may help reduce pinchpoints and alcohol-related crime and disorder in the night-time economy



Figure 9 Sections of Beckenham High Street have benefitted from temporary pavements widening during the pandemic by narrowing roads. If made permanent this may help reduce pinchpoints and alcohol-related crime and disorder in the night-time economy



Figure 10 As well as residential side streets and apartments above shops in the High Street within the Beckenham CIP, the town also has new residential developments near to transport hubs which attract customers from night-time economy venues nearby late at night



21 Observations - Bromley

Figure 11 Bromley town centre CIP is divided into three sections – the southern rail station end where there is a small cluster of licensed venues (below), the central retail heart (which has fewer licensed venues) and the northern end of the town where the largest cluster of premises is located.



Figure 12 The Bromley town centre north public realm investment has created a much better environment for operators and visitors (day and night) and there are relatively few pinchpoints. However, there are residential streets around the north of the town centre.

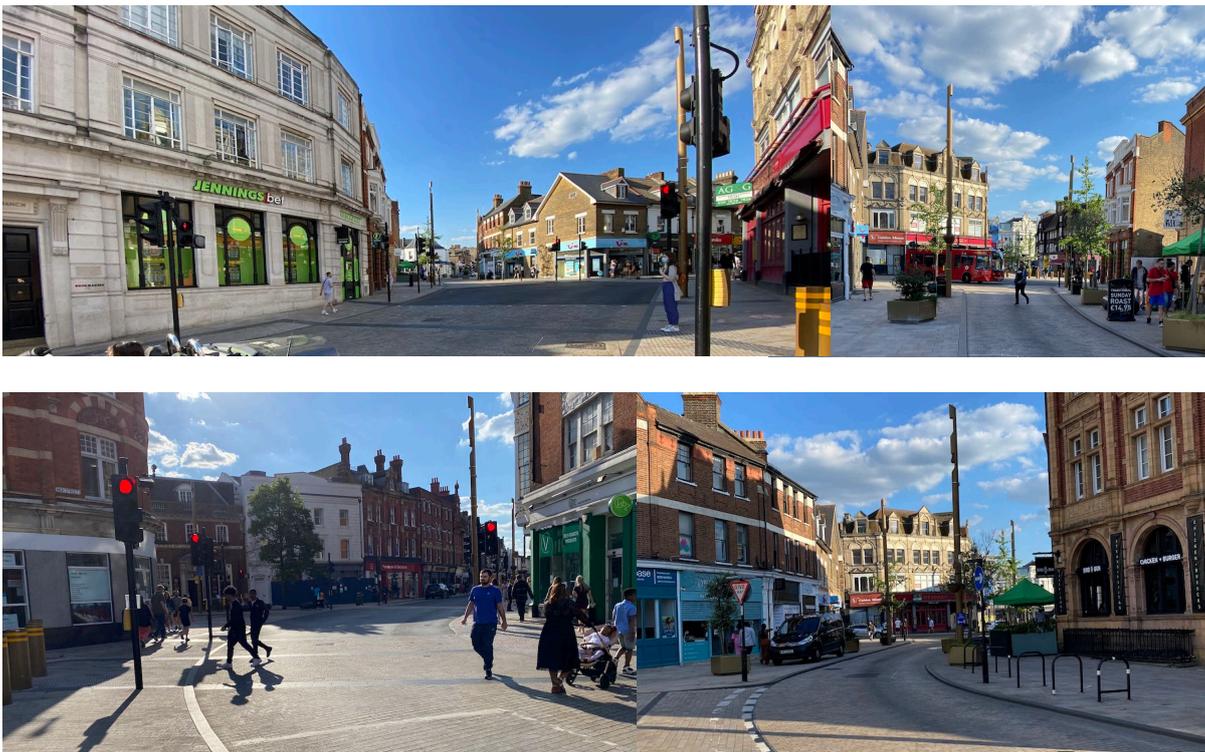


Figure 13 The Bromley town centre north section of the CIP has the greatest concentration of licensed venues in the Borough. Within an area that is 0.2km² approximately 65 of Bromley town centre' CIP's 97 licences are located. This density is similar to central London areas such as Soho and Shoreditch.



Figure 14 However, around and within the Bromley town centre north section of the CIP there is also a large amount of residential accommodation



22 Findings: Crime & disorder and public nuisance

23 Background

54. The Metropolitan Police were unable to provide analyst capacity to support the study. This means that the study has relied upon the SafeStats crime dashboard. A FoI request was also put in for alcohol related data.
55. SafeStats is the online crime statistics portal developed by the Mayor of London, GLA and MOPAC for London borough community safety partnerships to analyse a number of crime related data sets for their area and for comparative purposes. The largest data sets are those anonymised from CRIS (the Met's Crime Reporting Information System), but there are also data sets from British Transport Police and London Ambulance Service call outs.
56. In addition to the SafeStats data, in order to gain a more nuanced picture of the type of incident in the two CIP areas and how this might or might not constitute cumulative impact, anonymised CCTV data was produced for the two areas. This is shown in the following section.

24 SafeStats data

57. The challenge with the Metropolitan Police data within SafeStats - in its application for understanding cumulative impact - is that it does not disaggregate by the hour, or by day of week. It can only be divided by year, month and type of crime. Therefore, for the purposes of this study we have had to use the data
58. Before presenting the findings, for comparative purposes, an analysis was undertaken of both the size of each ward and its population. This is important as it gives a way of comparing **incident density** and **crime per capita**.
59. In terms of area, Bromley Town ward is 3.7km² which is **2.5%** of the borough's total area. Beckenham Copers Cope is similar though slightly smaller at 3.3km² and **2.2%** of the borough's total footprint. The average ward is 6.8km² and thus makes up **4.6%** of the borough's total footprint.
60. It is important to note that Bromley Town and Copers Cope wards do not match the exact boundaries of the current CIP areas. The CIP areas, whilst at the heart of each ward, are considerably smaller. This is because data is only available at this level – data is not provided by SafeStats at CIP level across London.
61. To this end, the figures thus presented here are highly conservative and defensible. In reality, the comparative figures for density of crime are likely to be much higher for each CIP. This is because the ward figures also cover the residential areas that make up the bulk of each ward. The majority of the licensed premises in each ward are located within the respective CIP area. Future analysis, when Metropolitan Police analysts are available, should seek to examine the crime data only for the CIP areas.
62. The population of each ward using the council's own most recent population estimates is as follows: Bromley Town 18,600 and Beckenham Copers Cope 15,950. **This is 5.8% and 5.0% of the borough's total population** respectively.

63. The higher than average size of population reflects the higher density of the two areas being town centres rather than the more suburban wards in the borough. For comparison, the average size Bromley borough ward, at 6.8km², is around twice the footprint of Bromley Town and Beckenham Copers Cope. The population level is relatively similar given the average in the borough is around 14,500.
64. All figures that are more than 10% higher than the borough average are shown in **red**. Those in **orange** are within 10% above or below the borough average. Those in **green** are those figures for CIP wards where crime and nuisance incidents are lower than the borough average by 10%.
65. As can be seen from the majority of indicators for both Bromley Town ward CIP and Coper's Cope ward CIP, the figures are higher than the borough averages. Sometimes substantially so.

25 Violent and sexual offences

66. The table below shows the most serious offences recorded violent and sexual offences for the past four years.
67. These indicators are often used by the Home Office and police forces as a proxy for night-time economy and alcohol-related crime, albeit it is important to note that not all of these incidents will have taken place at night or in or around or by customers of licensed premises. But as noted above, there will be many incidents which are not reported (albeit underreporting is by its nature lower for the most serious offences).

Figure 15 VIOLENT AND SEXUAL offences in Bromley and Beckenham, 2017 to 2020

Violent & Sexual Offences	2017	2018	2019	2020
Bromley	705	661	726	680
as % of Borough	11.1%	10.3%	10.8%	10.3%
Beckenham	364	391	340	301
as % of Borough	5.7%	6.1%	5.0%	4.6%
Bromley Borough	6372	6421	6749	6579
Ward average	290	292	307	299
No Wards	22	22	22	22

68. Overall, *recorded* violent crime and sexual offences in Bromley town centre ward have remained relatively consistent over the past 4 years at around 690 per year (between 10-11% of all those recorded in the borough).
69. There are more than twice as many violent crime and sexual offences in the Bromley town centre ward as the borough average, despite the ward being around half the size of the borough average. This means that, per km², violent crime and sexual offences in the Bromley town centre ward are 4x higher per unit of area, than the borough average.
70. There was a small reduction in recorded violent crime and sexual offences in the Bromley town centre ward during 2020 when there were substantial restrictions in trading for night-time economy licensed premises for much of the year.
71. Beckenham Copers Cope ward experiences around half the number of violent crime and sexual offences compared to Bromley Town. However, it is still above the borough ward average and given that Copers

Cope is half the size of the average ward. This means that the rate of violent crime and sexual offences per km² in Beckenham is around twice the Bromley borough average.

26 Drugs offences

72. Below are the drugs offences recorded in the two CIP wards for the past four years. Drugs offences include both the dealing of drugs and the possession of them. By the nature of this crime, the figures will only represent a very small proportion of drug possession and supply incidents.

Figure 16 DRUGS offences in Bromley and Beckenham, 2017 to 2020

Drugs	2017	2018	2019	2020
Bromley	97	146	215	276
<i>as % of Borough</i>	17.1%	22.0%	21.0%	23.3%
Beckenham	27	28	52	63
<i>as % of Borough</i>	4.8%	4.2%	5.1%	5.3%
Bromley Borough	567	664	1025	1185
Ward average	26	30	47	54
No Wards	22	22	22	22

73. Bromley Town Centre ward has by far the highest levels of drugs offences in the borough, with an average over the past four years of over 20% of all incidents. These have grown year on year. Even during the lockdown dominated year of 2020 these peaked at almost a quarter of all the borough's offences. This reflects the use of drugs within the night-time and licensed economy, but also their consumption in public spaces. This is reflected in the CCTV incidents (see next chapter) which show frequent drug taking in locations from parks to car parks.
74. Given the Bromley Town ward is around half the size of the average ward in Bromley borough, this means that recorded drugs offences here in 2020 were around 10x the ward average per km².
75. Beckenham town centre ward is much closer to the borough ward average in absolute numbers of drugs offences, albeit the numbers of recorded offences grew substantially in the last two years. However, as with Bromley Town, Beckenham is much smaller than the average ward, so drug offences were around 2x the borough average per km².

27 Robbery

76. Robbery includes what is commonly known as mugging. This is different from theft from the person (see below) because it is aggravated, often using threats of violence the implicit or explicit presence of a weapon.

Figure 17 ROBBERY offences in Bromley and Beckenham, 2017 to 2020

Robbery	2017	2018	2019	2020
Bromley	148	101	119	99
<i>as % of Borough</i>	24.8%	23.0%	24.3%	19.9%
Beckenham	35	18	29	21
<i>as % of Borough</i>	5.9%	4.1%	5.9%	4.2%
Bromley Borough	597	440	489	497
Ward average	27	20	22	23
No Wards	22	22	22	22

77. Bromley Town ward has a substantial minority of all the robbery incidents that take place in the borough, ranging from 20% in 2020 to almost a quarter four years ago.
78. Given a large amount of robbery is opportunistic and linked to the presence of people in town centres, this is unsurprising. However, there is a strong known link to victims being users of the night-time economy (albeit this is not the only setting in which it takes place, e.g., robbery in parks during daylight are common, as are people walking home from transport hubs on their return from work at night).
79. Given Bromley centre town ward is geographically around half the size of the borough's average ward, this means that the incident ratio per km² is around 10 to 12x the borough average over the last four years.
80. Beckenham town centre ward has been around or significantly above the borough average for robbery incidents in absolute terms across all of the past four years. However, it is around a quarter to a fifth of the levels of Bromley town centre ward. Yet because of its small size of Copers Cope, the per km² ratio varies between 2 and almost 3 times the borough ward average.
81. There has been a reduction in 2020 in both towns compared to 2017 and 2019 (although). This may be due to the, but it is not possible to tell without the detail of each crime.

28 Theft from the person

82. Theft from the person includes the lifting of bags, laptops, wallets and purses and very commonly mobile phones, as well as pickpocketing. In most cases the difference between robbery is clear, as there is no violence or threat of violence towards the individual in theft from the person, though the difference can sometimes be subtle. Theft from the person is prolific in the night-time economy and licensed premises because this is an area where people do leave their personal items unattended or are intoxicated and less careful than they may otherwise be.

Figure 18 THEFT FROM THE PERSON offences in Bromley and Beckenham, 2017 to 2020

Theft from Person	2017	2018	2019	2020
Bromley	101	126	245	171
<i>as % of Borough</i>	34.6%	41.9%	57.2%	56.3%
Beckenham	28	36	28	8
<i>as % of Borough</i>	9.6%	12.0%	6.5%	2.6%
Bromley Borough	292	301	428	304
Ward average	13	14	19	14
No Wards	22	22	22	22

83. Bromley Town Centre wards has been by far the biggest locus for theft from the person in the borough over the past four years. Indeed, in the past two years over half of all recorded offences in the borough took place in Bromley Town Centre ward.
84. Taking into account the small size of the Bromley Town Centre ward, there were on average 22xs as many incidents of theft per the person per km² here in 2020 than the average Bromley borough ward and 24x more in 2019 per km².
85. Beckenham town centre ward suffered significantly less theft from the person than Bromley Town Centre, but has over three of the four years studied still been substantially above the borough average, only falling under the average in 2020.
86. Beckenham town centre ward has averaged 25 thefts recorded each year over the past four years, against a ward average of 15. Given the small size of this ward this still means that the number of incidents per km² here is 3.4 times that of the borough average.

29 Public order

87. Public order is not a crime that is dominated by the night-time economy offences like many of those above, as it can include rioting, religious or race hatred of certain types, harassment and public disorder. But because it does include drunk and disorderly offences, affray, mass brawls (where there is a threat to the wider public in addition to any individual charges) - offences that are typically found in the night-time economy - public order was considered worthy of examination.

Figure 19 PUBLIC ORDER offences in Bromley and Beckenham, 2017 to 2020

Public Order	2017	2018	2019	2020
Bromley	225	222	212	221
<i>as % of Borough</i>	16.2%	15.0%	13.7%	13.7%
Beckenham	64	59	73	64
<i>as % of Borough</i>	4.6%	4.0%	4.7%	4.0%
Bromley Borough	1390	1476	1546	1614
Ward average	63	67	70	73
No Wards	22	22	22	22

88. Bromley Town Centre ward has substantially higher levels of public order offences than Bromley borough average. Incidents have remained remarkably consistent around 220 per year, though as a proportion of the borough these have fallen slightly in the last two years.
89. Given the small nature of the Bromley Town Centre ward, in relative terms over the past four years it has around 6x the borough ward average of public order offences per km².

90. Beckenham town centre ward is much closer to the borough average number of public order incidents, with two of the four years being lower by more than 10%. However, given the small size of the ward this still means that, per km², this is more than 2x the number of public order crimes recorded per km².

30 Anti-social behaviour

91. ASB, like public order, is a crime that is highly prevalent in the night-time economy where the consumption of alcohol exacerbates or lowers the threshold at which such negative behaviour takes place, but it is also found in other settings, notably retail and public place and areas where youth crime is prevalent.
92. ASB is wide ranging and sometimes includes crimes which have been initially recorded as ASB, such as criminal damage. The Home Office divides ASB into four categories: misuse of *public space*; *disregard for personal / community wellbeing*; *acts directed at people* and *environmental damage*.
93. ASB in 2020 is quite a different picture to previous years with over twice the average number of incidents in the borough. Research from other London boroughs suggests that this has been fueled by reports of those not observing Covid guidelines in parties, illegal house parties and raves, as well as unlawful behaviour in public spaces given the increases in public drinking when pubs, bars and restaurants and nightclubs were shut.

Figure 20 ASB offences in Bromley and Beckenham, 2017 to 2020

ASB	2017	2018	2019	2020
Bromley	753	753	938	1638
<i>as % of Borough</i>	13.2%	14.9%	16.1%	15.1%
Beckenham	364	340	414	732
<i>as % of Borough</i>	6.4%	6.7%	7.1%	6.8%
Bromley Borough	5708	5048	5822	10815
Ward average	259	229	265	492
No Wards	22	22	22	22

94. The Bromley Town Centre ward has consistently been the ward with the largest amount of recorded ASB in the last four years in Bromley Borough, having around 15% of all incidents. This is 6x the ward average per km².
95. Beckenham has significantly lower ASB than Bromley Town Centre ward, but this is still much higher than the borough ward average (approximately 1.5x). By km² this works out at around 3x the borough average.

31 Alcohol related violent crime

96. An analysis of alcohol-related recorded crime was undertaken following a freedom of information request to the Metropolitan Police.

97. It is important to note here because of the poor recording standard for alcohol crime, the overall number of incidents will be much higher. The reason for this is that officers rarely and, in some cases, never add the alcohol maker to the main reason for arrest. Alcohol markers, even for drunk and disorderly offences, are not automatically added.
98. This is also true of alcohol related hospital admissions, which studies have shown are a true fraction of the real total because the admissions where alcohol was involved (except those where alcohol was the main reason for admission) are rarely accurately captured.
99. As a result, this should be considered with caution in terms of overall figures which are small. But the data that has been provided (see following table) does show that Bromley Town Ward has almost twice the number of incidents as its next closest next ward (Cray Valley East). Beckenham's Coper Cope town centre is fifth.

Figure 21 Alcohol-related violent crimes by ward marked as alcohol related 2019-2021

Ward	Mar 2019-Feb 20	Mar 2020-Feb 2021	Two year total
Bromley Town	31	23	54
Cray Valley East	17	14	31
Crystal Palace	17	13	30
Plaistow and Sundridge	19	9	28
Copers Cope	16	9	25
Penge and Cator	11	13	24
Orpington	15	8	23
Hayes and Coney Hall	15	5	20
Mottingham and Chislehurst North	11	9	20
Petts Wood and Knoll	10	9	19
Bromley Common and Keston	7	10	17
Clock House	8	7	15
Cray Valley West	14	\'	14
Kelsey and Eden Park	7	7	14
Chislehurst	8	4	12
Farnborough and Crofton	6	4	10
Darwin	5	1	6
Bickley	3	3	6
West Wickham	3	3	6
Biggin Hill	2	2	4
Chelsfield and Pratts Bottom	0	2	2
Shortlands	1	0	1
Grand Total	226	155	381

100. It is worth noting that the number of alcohol-related violent crimes fell in nearly all wards in 2020/2021 when the night-time economy and licensed venues were shuttered for most of the year, particularly at night with curfews and venues only able to operate at a fraction of normal capacity and offer table service only.
101. When considering the number of incidents per unit of area, over the two years the borough average is 2.5 alcohol-related violent crimes per km². However, Bromley Town Ward is smaller than the average ward and here the rate of alcohol-related violent crimes per is 15 per km². In Beckenham the rate is alcohol-related violent crimes is 8 per km². This is 6x and 3x the borough average respectively.

32 Findings: CCTV data

102. CCTV data was anonymised and passed to the researchers. This gives descriptions of each incident recorded by CCTV operatives.
103. It is important to note that CCTV data cannot be seen as a 'census' of all crime and disorder or public nuisance taking place in the two CIP area town centres under consideration. There are a number of reasons for this, and these are as follows.
104. Whilst there are 34 main council cameras in Bromley town centre and 12 in Beckenham, they cannot possibly cover every location and every simultaneous incident. There are limits on what one operator can record at any one time, and they must also prioritise.
105. Most serious incidents of violence, robbery and disorder will be seen or reported to the CCTV control room by either the police or the security at licensed premises. However, the much larger number of low level incidents that are taking place will either be missed by operators or not prioritised because the operator needs to focus on the most serious incident at any time.
106. It is not possible, without having a team of observers on every street corner to capture closer to 100% of incidents (a census), to understand what the proportion of *all* incidents CCTV operators record. Experience in this kind of research tells us it will be many times the actual number recorded.
107. It is also worth noting that CCTV cameras are sometimes not working, obscured due to trees or buildings and times when the operator may not be there.
108. However, as a two year programme of data collection that gives a very significant and robust picture of the type of crime and disorder and public nuisance that is taking place, and crucially, at what times of days and days of the week it is taking place, the data is robust.
109. Also, noise incidents are not captured. Other cumulative impact studies, where field observation has taken place, show that noise is a major public nuisance issue for residents in and around the night-time economy and clusters of licensed premises. As such this element will be missing from the CCTV data.
110. In terms of how the data was analysed, the 6,831 incidents from 2018 and 2019 were manually reviewed and included or excluded based on whether they were night-time economy associated or with a direct connection to the cumulative impact of licensed premises. The following criteria was used for cumulative impact:
- Was there a mention of somebody entering, leaving a licensed premises (this includes late night refreshment places as well as pubs, bars, restaurants etc.)
 - Was somebody demonstrably drunk or exhibiting intoxicated behaviour (alcohol or durn) in the town centre?
 - Was there a fight, altercation, theft use of drugs that could be linked to users of the night-time economy?
 - Was there begging associated with licensed venues specifically or targeting of the users of the night-time economy who would not be there if there were not clusters of licensed premises.

- Any other incident that has a reasonable connection to the customers of the night-time economy and licensed venues, whether as perpetrator or victim of crime.

111. It is important to note that in many instances it is not possible (by the very nature of CCTV data) to categorically prove that each incident is *absolutely* linked to a licensed premises in the town centre or not. The 'balance of probability' has been used based on the fine grain detail of the individual reports. For example, if someone is staggering around in the street, whether day or night, they will likely have been drinking alcohol. In the evening and at night this tends to be people who will have had most or all of their alcohol in the towns' pubs, bars and clubs (although they may have pre-loaded with alcohol from venues not in the town centre).
112. It is also worth noting how cumulative impact is to be interpreted (beyond the broad statement in the Guidance) is not proscribed in detail by law. If there is a negative externality from the presence of licences, then it does not matter whether or not it is a serious crime. If someone's action creates a negative impact of any kind, then it can be seen as cumulative impact.
113. So, for example, whilst an incident may take place inside a venue (and is thus in the first instance it is the responsibility of that licensee), nearly every one of these incidents has an impact beyond the venue. So, for example, aggressive or violent inside a pub becomes cumulative impact once they are ejected onto the street. If a police vehicle or ambulance is despatched to bring someone out, simply the presence of these vehicles is likely to have a significant impact on whether local residents think their town centre is safe, pleasant or a place they want to go out in (*public safety*).
114. This is also the case with begging. Beggars are generally begging first and foremost for money, alcohol, drugs or food, but their presence in the evening and night-time economy has become (as can be seen in these statistics) an increasing presence over the past decade in the night-time economy. They are attracted specifically by customers of pubs, bars and restaurants and, even if not aggressively begging, this is an issue of *public nuisance* and *public safety*. However, begging during the day around shops has been explicitly excluded.
115. Drug dealing is another area where there is considerable room for interpretation. During the day Bromley in particular has significant drug dealing and drug use. However, it at this time of day it does not appear to be linked to customers of licensed premises. However, most incidents after 6pm and before 6am would not be happening in the two town centres if there were not a night-time economy in them. These incidents are therefore included.
116. Overall, the definition of cumulative impact for this study is anything that could negatively affect the four licensing objectives that takes place because, on the balance of probability, there is a cluster of licensed premises in each town.

33 Findings

117. Overall, there were more 3x the number of overall incidents captured in Bromley than Beckenham in 2019 (2,063 vs 622). This is unsurprising because the town centre is considerably larger.
118. However, there are other reasons linked to the fine grain of the data why Bromley has such a high number. A very large number of incidents are linked to the Glades shopping centre, and a much larger number of

individuals attracted to Bromley town centre who are rough sleepers and who frequently beg and have alcohol and / or drug dependency issues.

Figure 22 BROMLEY CCTV CI incidents 2019 & 2020

Bromley	2019 total	2019 NTE	2019 CI	2020 total	2020 NTE	2020 CI
January	193	76	40	263	123	43
February	212	105	81	375	192	72
March	212	138	102	332	152	45
April	139	87	68	244	118	21
May	134	80	58	207	95	17
June	126	83	56	292	130	15
July	201	130	82	352	177	36
August	191	111	75	375	226	51
September	157	113	73	253	150	37
October	135	89	64	353	183	46
November	196	118	67	245	107	23
December	167	108	74	330	149	34
Total	2063	1238	840	3621	1802	440
<i>Percentages</i>	<i>100%</i>	<i>60.0%</i>	<i>40.7%</i>	<i>100%</i>	<i>49.8%</i>	<i>12.2%</i>

119. There was a very significant increase in Bromley's total incident count in 2020 from 2019 (up from 2,063 to 3,621 – a 76% increase). This is despite the two lockdowns which affected not only the night-time economy but also non-essential retail which is a key part of Bromley town centre's land use. It is impossible to be absolutely certain, but analysis of the individual incidents suggests that there was considerably more low level anti-social behaviour recorded in 2020. (NB the number of CCTV incidents relating to lack of social distancing was limited so it is not this that drove up numbers).

120. In terms of all night-time incidents (between 6pm and 6am) there was a less substantial increase in incidents in Bromley between 2019 and 2020 of 46%.

121. However, of greatest significance to this cumulative impact study is the huge fall (from 840 to 440) incidents that can be classified as cumulative impact between 2019 (when the town was operating normally in terms of licensed premises) and 2020 when the pandemic restrictions impacted. It is clear than when the pubs, bars, restaurants and clubs were restricted in capacity and closed for long periods for all 9 months in the case of nightclubs), that cumulative impact fell substantially.

122. The table below shows Beckenham's figures.

Figure 23 BECKENHAM CCTV CI incidents 2019 & 2020

Beckenham	2019 total	2019 NTE	2019 CI	2020 total	2020 NTE	2020 CI
January	68	51	28	18	16	12
February	22	18	12	35	33	22
March	30	25	17	45	33	19
April	32	25	15	28	20	5
May	45	36	22	49	31	12
June	58	51	32	45	37	10
July	51	44	26	59	32	14
August	57	42	27	62	40	12
September	90	67	40	42	22	9
October	56	35	21	43	28	10
November	68	51	28	50	34	7
December	45	33	14	49	36	9
Total	622	478	282	525	362	141
<i>Percentages</i>	100%	76.8%	45.3%	100%	69.0%	26.9%

123. The trend for a reduction in CI-related incidents in 2020 is mirrored (ablet not quite as extremely) in Beckenham, with a fall from 45% of all incidents in 2019 to 27%. The reason that the fall is not so extreme is that there was a small fall in overall incidents in Beckenham (rather than the substantial increase seen in Bromley).

34 Findings: London Ambulance Service

35 Background

124. Ambulance call outs for assaults in the night-time economy and alcohol-related illnesses are a recognised indicator of cumulative impact, though it is impossible with the alcohol element to know that every person who is picked up was using a licensed premises (be it on-premises like a pub or nightclub, and off-premises like off-licence or supermarket or late night refreshment premises).
125. Because London Ambulance Service (LAS) data on Safe Stats (unlike Met Police data) can be analysed by time of day, and day of week, the study uses only Friday and Saturday night callouts from 9pm to 6am the following morning. This deliberately underestimates the number of callouts overall and is a conservative technique that reduces to a minimum any incidents that are not related to licensed premises or the night-time economy. For example, domestic violence in residential settings within the town (albeit alcohol from off-licence or supermarket may have been an aggravating factor in these incidents).
126. To get as close as possible to the nature of each incident, each call out was manually reviewed and the researchers sought to eliminate any that were unlikely to be linked to licenced premises or the consumption of alcohol in the town centre.
127. There will be a very large number of incidents which ambulances were called out to but where alcohol was not recorded by the paramedics. As a result, the figures below are likely to be a *significant* underestimate of the true picture of alcohol and assaults in the two towns.

36 Ambulance assault callouts

128. The table below shows the number of assault callouts likely to be linked to licence premises and the night-time economy over the past four years.

Figure 24 LAS ASSAULT call outs, Bromley Town Centre and Beckenham Copers Cope wards (Weekends 9pm-6am)

LAS - Assault Call Outs	2017	2018	2019	2020
Bromley	43	34	41	19
as % of Borough	20.9%	21.4%	27.7%	16.7%
Beckenham	25	14	9	17
as % of Borough	12.1%	8.8%	6.1%	14.9%
Bromley Borough	206	159	148	114
Ward average	9	7	7	5
No Wards	22	22	22	22

129. In Bromley Town Centre ward, incidents were fairly consistent over the years 2017 to 2019 but halved in 2020. An average of 22% of all the borough's LAS assault call outs take place in Bromley Town Centre ward.

130. Given that the Bromley Town Centre ward covers just 2.5% of the borough, this means that the ward receives 9x the borough average of assault call outs linked to the licensed and night-time economy per km².
131. Beckenham town centre ward also has considerably more assault ambulance call outs than the borough average. As the ward is small, in relative terms, the number of assault call outs per km² is therefore 7x the borough average.

Figure 25 LAS ALCOHOL illness call outs Bromley Town Centre Ward CIP and Beckenham Copers Cope ward CIP

LAS - Alcohol Call Outs	2017	2018	2019	2020
Bromley	68	47	58	29
<i>as % of Borough</i>	21.1%	16.2%	21.2%	16.3%
Beckenham	32	28	23	13
<i>as % of Borough</i>	9.9%	9.7%	8.4%	7.3%
Bromley Borough	322	290	273	178
Ward average	15	13	12	8
No Wards	22	22	22	22

132. In the Bromley Town ward ambulance call outs for alcohol related incidents on weekend nights are very similar to the assault call outs, with an average of 18% of the borough's ambulance trips over the past four years.
133. This is a figure of 8x the borough average per km² .
134. Beckenham is lower than Bromley, at around a tenth of all the alcohol call outs in the borough. But again, this substantially above the borough average and about 4x the borough ward average per km².
135. In terms of alcohol-related call outs, which are more particular closely linked to the night-time economy, the number of call outs in Bromley was 50% lower in 2020 (when the night-time economy was mostly shuttered) than the previous three year average.
136. In Beckenham the number of call outs was 54% lower in 2020 than the average number of call outs over the previous three year average.

37 Findings: Noise nuisance

137. Analysis was undertaken of the council's Noise Reporting Database for examples of noise pollution and public nuisance for 2019 which may be substantially or partly linked to the licensed economy.
138. It should be noted that, as evidenced in other CIP studies (e.g., Hounslow, Richmond, Hammersmith and Fulham), reported incidents will be a tiny fraction of those taking place during the same time period when those locations are under field observation. However, when considered cumulatively, this can still have a significant negative impact on the community and residential wellbeing.
139. There are 20 noise used in noise reporting in Bromley. Of these, **three** may be linked to the presence of licensed premises, events and the night-time economy and which have meaningful data attached to them. These are 'Noise in the street', 'Noise from licensed premises' and 'Noise from live concerts'.
140. The records are from 1st January 2018 to 14th May 2021.
141. It is important to note that not all of these complaint categories are uniquely cumulative impact problems. Noise coming from customers who have left premises and are in the street outside or walking home can be very much considered cumulative impact.
142. However, noise coming from a licensed premises, whilst it can have an impact on neighbours, cannot in the strictest terms be considered cumulative impact (as it should be dealt with by the authority on a case-by-case premises basis).
143. However, a resident near the town centre may be kept awake or have their quality of life impacted upon by the general travel of sound from a cluster of licences premises where it is hard to pin down a specific source. To this end it is for the purposes of this research reasonable to at least reference these to licensed premises or events.

Figure 26 Noise IN THE STREET complaints by ward 2018-21

WARD	COMPLAINTS
BROMLEY TC	31
COPERS COPE	13
CRYSTL	12
BROCOK	10
CHIS	10
CRAYWW	10
PENCAT	9
WESTWK	8
CRAYVE	7
KELEDN	6
PLASUN	6
BIGHIL	5
CLOCK	5
HAYCON	5
ORPTON	5
MOTCHN	4
CHEPRB	3
FARCRT	3
BICK	2
DARWIN	2
SHORT	2
PETSWK	

144. Overall numbers of noise in the street reports were relatively low. However, Bromley Town and Copers Cope were the two highest wards, with Crystal Palace next. It is worth noting that it is not possible to ascribe every incident in this category to the customer of a licensed premises. However, these incidents are highest in the two wards that cover the CIP areas with by far the largest concentrations of licensed premises in the borough.

Figure 27 Noise from LICENSED PREMISES complaints by ward 2018-21

WARD	COMPLAINTS
COPERS COPE	108
CHIS	40
KELEDN	38
CLOCK	37
BROMLEY TC	31
PLASUN	24
DARWIN	13
PENCAT	12
HAYCON	9
CRYSTL	8
PETSWK	8
WESTWK	7
BICK	5
BROCOK	4
FARCRT	4
CRAYVE	3
ORPTON	3
MOTCHN	2
BIGHIL	1
CHEPRB	0
CRAYWW	0
SHORT	0
	357

145. Noise from licensed premises is one of the most consistent forms of noise nuisance in the borough to be reported to the authority.
146. The highest by some distance in Beckenham's Copers Cope ward which contains the Beckenham town centre CIP area (109 complaints), suggesting there is a consistent noise nuisance problem here which may be linked to a small number of premises.
147. It is worth noting that the current Beckenham town centre CIP, whilst nearly all within Copers Cope ward, does include a small area of Clock House ward (around the War Memorial). There are a small number of pubs in this corner. It is also a major meeting place and a place where people walk home from pubs and bars in the town centre. Given that Clock House ward has the fourth most complaints (just ahead of Bromley TC), it may well be that there is a cumulative premises noise problem around this agglomeration of licensed premises.
148. Bromley Town ward is the fifth most complained about ward for licensed premises noise. However, Unlike Copers Cope and Clock House, there are far less residential streets surrounding Bromley town centre CIP area and its pubs and bars. Therefore, it could be that either most licensed premises in Bromley Town have been well managed from a noise perspective, or that even if there are some that do have noise issues, there are simply not enough residents nearby to generate a large number of complaints. Without observation work this is impossible to establish.

Figure 28 Noise from CONCERTS complaints by ward 2018-21

WARD	COMPLAINTS
CRYSTL	19
BROMLEY TC	4
CHIS	3
COPERS COPE	2
HAYCON	2
KELEDN	2
CLOCK	1
CRAYVW	1
DARWIN	1
BICK	0
BIGHIL	0
BROCOK	0
CHEPRB	0
CRAYVE	0
FARCRT	0
MOTCHN	0
ORPTON	0
PENCAT	0
PETSWK	0
PLASUN	0
SHORT	0
WESTWK	0
Total	35

149. Noise from concerts is much lower than the other two categories and mostly likely linked to events in Crystal Palace Park impacting on its neighbours.

38 Findings: Residents' survey

39 Background

150. In 2020, the Council undertook its annual online survey of around 1,100 residents. There are key *public safety, crime and disorder* and *public nuisance* questions within the survey. The survey returned relatively modest samples at ward level. By analysing the postcode of each anonymised respondent, it was possible to geo-locate each resident within or outside the existing CIP areas.
151. There were 38 respondents from within the Bromley Town CIP, but only 4 within the Beckenham CIP. To this end, only Bromley Town has been analysed. Even then, this number should be considered with caution as it is not robust enough to be statistically significant. However, despite the small sample, it does provide a valuable insight into how residents within the CIP feel about key issues linked to the presence of a night-time economy and the clustering of licensed premises.
152. From the survey questions that were extracted, there is a strong known link between negative behaviour and the cumulative impact of licensed venues and the night-time economy.
153. It is worth remembering that the survey results are based on respondents' feelings and experiences.* This does not constitute actual incidents, albeit it is no less important for this. (*Although questions in the survey do then ask why respondents felt that way and often the reason they gave their answer is that they were a victim of crime themselves or that their family was a victim).
154. It is also worth noting that the level of crime, ASB, noise etc. acceptable to many of those living in town and city centre settings is likely to be higher to those living in a quieter suburb. That is, town and city centre residents (as a cohort) are generally more prepared to put up with the negatives of living in these locations as they feel the benefits outweigh them (e.g., being close to shops and services, transport hubs, social life etc).
155. Areas where Bromley Town CIP residents felt significantly *more concerned* or *more afraid* than the borough average are highlighted in **pink**. The areas where they are significantly *less concerned* or *less afraid* are shown in **blue**.
156. Overall, there is a strong indication that, regardless of any 'urban tolerance phenomenon', residents in the Bromley Town CIP area do have more concerns and experiences of crime, ASB and public nuisance relative to the presence of a night-time economy than those in quieter areas of the borough.
157. In terms of specific findings, for those questions which are linked to the presence and clustering of night-time or licensed premises, such as, **sexual crime, robbery, begging, groups loitering** and **drug use**, residents of the Bromley Town CIP area were *more likely* than the borough as a whole to say that these crimes or nuisance were a *fairly big* or *very big* problem locally.
158. This was also true for **alcohol-related disorder** for residents within the Bromley Town Centre CIP area compared to the borough generally.

159. The only area where the borough as a whole returned more negative results than Bromley Town Centre CIP area was around feelings of safety. This may indicate the ‘urban tolerance phenomenon’ noted above.
160. (NB it is important to note that the survey does cover other crimes that are not linked to the licensed venues and the night-time economy which may also affect how respondents felt, e.g., car crime, burglary etc.)

40 Findings – Most serious crimes

161. Residents were asked about their experiences of the most serious crimes in their local area.

Figure 29 Bromley Town CIP residents’ experiences of most serious crimes

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Criminal damage - Borough	3.9%	43	34.4%	379	36.1%	398	16.9%	186	9.2%	101	1103
Criminal damage - Bromley CIP	2.6%	1	35.8%	14	34.2%	13	13.2%	5	13.2%	5	38
Robbery - Borough	2.3%	25	21.7%	240	32.5%	360	30.4%	337	13.3%	147	1107
Robbery - Bromley CIP	2.6%	1	15.8%	6	44.7%	17	23.7%	9	13.2%	5	38
Sexual related crime - Borough	7.3%	80	24.6%	271	13.0%	144	3.1%	34	52.2%	576	1104
Sexual related crime - Bromley CIP	7.9%	3	21.1%	8	18.4%	7	5.3%	2	47.4%	18	38

162. In terms of **criminal damage** there was little between Bromley Town CIP residents and the rest of the borough when it came to those saying that it was a *fairly big* or *very big* problem.
163. There was more of a difference regarding **robbery**. This is not exclusively a night-time or licensed economy cumulative impact issue but one which does have a strong correlation with these settings and customer vulnerability. Almost 70% of Bromley Town CIP respondents said they felt robbery a *fairly* or *very big* problem compared to around 63% borough-wide.
164. **Sexual-related crime** is particularly significant within the late night and licensed economy. Almost a quarter of Bromley Town CIP respondents said they felt it a *fairly* or *very big* problem compared to around 16% borough-wide.

41 Findings – Anti-social behaviour

165. Residents were then asked about their experiences of ASB and public nuisance in their local area. Below are the three incidents that are strongly correlated with the evening and night-time economy and the co-presence of licensed premises.

Figure 30 Bromley Town CIP residents’ experiences of ASB and nuisance

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Begging - Borough	15.1%	168	45.7%	508	25.2%	280	11.1%	123	3.3%	37	1112
Begging - Bromley CIP	2.6%	1	44.7%	17	18.4%	7	34.2%	13	0.0%	0	38
Groups loitering - Borough	7.2%	80	34.0%	378	34.7%	386	19.8%	220	4.5%	50	1112
Groups loitering - Bromley CIP	2.6%	1	23.7%	9	44.7%	17	26.3%	10	2.6%	1	38
Noise nuisance - Borough	25.1%	278	46.7%	518	14.6%	162	6.0%	67	8.1%	90	1110
Noise nuisance - Bromley CIP	26.3%	10	44.7%	17	15.8%	6	2.6%	1	10.5%	4	38

166. **Begging** is a particularly significant problem within the late night and licensed economy (see also CCTV data). Whilst not illegal (unless prohibited by a PSPO) aggressive begging is a significant, intimidatory and harassing practice and deters both residents and visitors from using town centres. There was a very large discrepancy between Bromley Town CIP respondents and the rest of the borough. 34% of the former said it was a *very big* problem locally compared to around 11% borough-wide.

167. **Groups loitering** is commonly associated with the evening and town centre locations, where alcohol consumption may be a significant issue, albeit they can also be an issue for residents during the day. There is clearly a significant issue in Bromley Town CIP relative to the remainder of Bromley borough given 71% said it was a *fairly* or *very big* problem compared to around 55% borough-wide.
168. There was little difference when it came to **noise nuisance** for borough-wide respondents or Bromley CIP residents specifically. This reflects the noise data findings in the previous section.

42 Findings – Drug use

169. Residents were then asked about their experiences of **drug use** and crime and public nuisance related to the sale and consumption of drugs in their local area. Below are the drugs-related incidents that are known to be correlated with the evening and night-time economy and the cumulative presence of certain types of licensed premises.

Figure 31 Bromley Town CIP residents' experiences of drug use, dealing and paraphernalia

Crime, ASB or concern in past year	Not a problem	Not very big	Fairly big	Very big	Don't know	Total					
Drug use behaviour - Borough	8.7%	96	29.8%	331	27.2%	302	14.6%	162	19.7%	219	1110
Drug use behaviour - Bromley CIP	5.3%	2	21.1%	8	28.9%	11	23.7%	9	21.1%	8	38
Drug para - cannisters - Borough	8.6%	96	29.1%	323	30.4%	338	20.2%	225	11.7%	130	1112
Drug para - cannisters - Bromley CIP	2.6%	1	28.9%	11	36.8%	14	18.4%	7	13.2%	5	38
Drug possession - Borough	7.4%	82	21.6%	239	22.1%	245	13.7%	152	35.3%	391	1109
Drug possession - Bromley CIP	5.3%	2	15.8%	6	21.1%	8	21.1%	8	36.8%	14	38
Drug use - Borough	7.29%	81	19.5%	217	26.7%	297	16.1%	179	30.3%	337	1111
Drug use - Bromley CIP	7.9%	3	15.8%	6	18.4%	7	28.9%	11	28.9%	11	38
Drug supply - Borough	7.85%	87	18.7%	207	24.3%	269	17.9%	198	31.3%	347	1108
Drug supply - Bromley CIP	5.3%	2	21.1%	8	15.8%	6	21.1%	8	36.8%	14	38

170. **General drug-use behaviour** was considered a *very big issue* for 24% of Bromley Town residents relative to 15% of borough wide respondents.
171. The rise in NOx **drug cannister** usage in the night-time economy has been a feature of the past decade with used capsules found in drainage gutters, public spaces and private gardens in or near to the centre of London's night-time economies. Whilst possibly dangerous to the user, residents in particular object to them - despite the minimal harm to them personally - because of the visual impact on their neighbourhood. Thus, their symbolic effect is greater than the inconvenience of their physical disposal. There is relatively little between the Bromley CIP residents (55%) and those across the borough (51%) saying they were *fairly big* or a *very big* problem.
172. Whilst **drug possession** is highly associated with the night-time economy and drug use around licensed premises, it is hard for locals to actually 'experience' drug possession so this should be taken with caution. However, of those who live in the Bromley Town CIP area 21% vs 14% the borough average said that drug possession was a *very big* problem.
173. **General drug use** is easier for residents to identify – given they may see it in their street or the town centre or find the paraphernalia afterwards. Of those who live in the Bromley Town CIP area, 29% vs 16% the borough average said that drug use was a *very big* problem where they lived. This is a significant finding.
174. This was also similar for **drug supply**, which resident may see taking place on street corners and alleyways in their neighbourhood. This can be linked with those users of the evening and night-time economy purchasing drugs before or during nights out. 21% of Bromley Town CIP respondents vs 18% boroughwide said it was a *very big* problem.

43 Findings – Alcohol misuse

175. Residents were then asked about their experiences of **alcohol** misuse and crime, as well as public nuisance related to the sale and consumption of alcohol in their local area. Below are the alcohol-related incidents that are strongly correlated with the evening and night-time economy and the co-presence of licensed premises.

Figure 32 Bromley Town CIP residents' experiences of alcohol use and crime and public nuisance

Crime, ASB or concern in past year	Not a problem		Not very big		Fairly big		Very big		Don't know		Total
Alcohol disorder - Borough	9.6%	106	38.6%	427	25.7%	284	9.0%	100	17.2%	190	1107
Alcohol disorder - Bromley CIP	5.3%	2	28.9%	11	39.5%	15	10.5%	4	15.8%	6	38
Street drinking - Borough	9.6%	106	38.6%	427	25.7%	284	9.0%	100	17.2%	190	1107
Street drinking - Bromley CIP	0.0%	0	52.6%	20	28.9%	11	5.3%	2	13.2%	5	38
Underage drinking - Borough	10.7%	119	33.4%	370	17.0%	189	5.5%	61	33.4%	370	1109
Underage drinking - Bromley CIP	0.0%	0	39.5%	15	18.4%	7	2.6%	1	39.5%	15	38
Underage alcohol sales - Borough	13.0%	144	27.1%	300	8.6%	95	3.2%	35	46.1%	532	1106
Underage alcohol sales - Bromley CIP	5.3%	2	28.9%	11	7.9%	3	0.0%	0	57.9%	22	38

176. In terms of the alcohol-related crime and public nuisance experiences of residents, there were only small differences between residents of Bromley Town CIP area and the borough as a whole, with the exception of **alcohol-related disorder**. This is the indicator most linked to the night-time economy and for this 50% of Bromley Town CIP respondents said it was *fairly big* or a *very big* problem compared to 35% of borough-wide respondents.

44 Findings – Feelings of safety

177. Residents were asked about **how safe they felt** in their local area **during the day** and **after dark**.

Figure 33 Bromley Town CIP residents' feelings of safety

Feelings of safety in local area	Very safe		Fairly safe		Fairly unsafe		Very unsafe		DK / don't go out		Total
When outside after dark alone - Borough	6.9%	77	47.2%	527	29.9%	334	14.3%	160	1.6%	18	1116
When outside after dark alone - Bromley CIP	15.8%	6	39.5%	15	39.5%	15	0.0%	0	5.3%	2	38
When outside in daylight alone - Borough	37.6%	420	50.5%	563	8.9%	99	2.8%	31	0.3%	3	1116
When outside daylight alone - Bromley CIP	28.9%	11	57.9%	22	13.2%	5	0.0%	0	0.0%	0	38

178. In all of the previous questions, and where there is a clear difference, Bromley Town CIP respondents said they are more likely than the borough average to experience crime and disorder and public nuisance with known links to the licensed and night-time economy. However, this is not the case for those that feel *very unsafe* when out **after dark alone** in the town. At this time of the day, Bromley Town CIP respondents feel a little *safer* than the borough as a whole.

179. Yet **during the day** Bromley Town CIP respondents also feel a little *more unsafe* than the borough as a whole.

Figure 34 Bromley Town CIP residents' feelings of safety

Overall crime and ASB	Much greater		Slightly greater		About same		Slightly lower		Much lower		Total
Crime compared to last year - Borough	22.6%	251	42.3%	470	33.0%	367	2.3%	25	0.2%	2	1112
Crime compared to last year - Bromley CIP	15.8%	6	34.2%	13	50.0%	19	0.0%	0	0.0%	0	38
ASB compared to last year - Borough	22.7%	251	38.4%	425	36.2%	401	2.4%	27	0.5%	5	1107
ASB compared to last year - Bromley CIP	25.6%	10	35.9%	14	38.5%	15	0.0%	0	0.0%	0	39

180. Overall, Bromley Town CIP area respondents were less likely than borough-wide respondents to say that **crime over the previous year** had got worse. This obviously covers a wide range of crimes, not just those associated with the night-time economy and licensed premises.

181. There were no significant differences within the figures for **ASB over the previous year** between Bromley Town CIP area and borough-wide respondents.

45 Findings: Public health

46 Context

182. Public Health is a statutory consultee under the Licensing Act 2003.
183. Overall, as the following data shows, across most indicators, Bromley has above London and above UK levels of alcohol harms within the community.
184. Whilst public health is not one of the four licensing objectives in England and Wales (unlike Scotland), public health are able to object to licences and respond to licensing policy.
185. This is most likely to be relevant on the basis of three of the four licensing objectives: *crime and disorder* (i.e., alcohol-related violence requiring hospital admissions) and *public safety* (fear of those who have consumed too much alcohol, for example in the street or in a domestic setting) and *protection of children from harm* (underage alcohol consumption and its negative individual health, crime and societal outcomes).
186. In the case of Bromley, there are above average figures in most alcohol indicators, particularly around children's accessing, consuming and treatment requirements for alcohol.
187. Bromley Public Health provided the following position statement on alcohol and alcohol-related harm in the borough.

47 Background

188. Alcohol plays an important social and economic role in society and most people who do drink enjoy alcohol without harm. However, excessive alcohol use can have a harmful effect on individuals, their families and the communities. There are huge costs to the UK economy with alcohol named as the most dangerous drug in the UK in 2009.
189. The health harms associated with alcohol consumption are widespread in every area of England, including Bromley. Nationally there are an estimated 10.4 million adults (Health Survey for England) drinking at levels that cause at least some level of risk to their health. Alcohol related harms are broad ranging and health-related problems include hypertension, cardiovascular disease, cancer, liver disease, *mental illness*, *accidents in the home and on the road*, *violence* and *premature death*. (italics those that would be considered relevant to the Licensing Act 2003 and its four licensing objectives).

48 Bromley Primary Care analysis

190. In 2013 GP data on the alcohol units consumed by people on the Bromley practice disease register were extracted and analysed. This analysis showed that between 2008 and 2013 38% (n=125,470) of patients in Bromley had their alcohol values recorded. These values were analysed into hazardous and harmful drinking categories. Comparisons were made between levels of deprivation using the indices of multiple deprivation (IMD) for that ward as a measure. There is no reason for us to believe that, overall, this has changed significantly since the data was collected.

191. Some of the highest rates of hazardous alcohol consumption were recorded in Orpington and Bromley Town Centre. The map below was produced to identify the hotspots of hazardous alcohol consumption.

192. Bromley Town Centre (Bromley CIP area) and Copers Cope (Beckenham CIP area) are high or above average.

Figure 35 Rates of Hazardous Drinking (per 1,000) by Bromley Ward

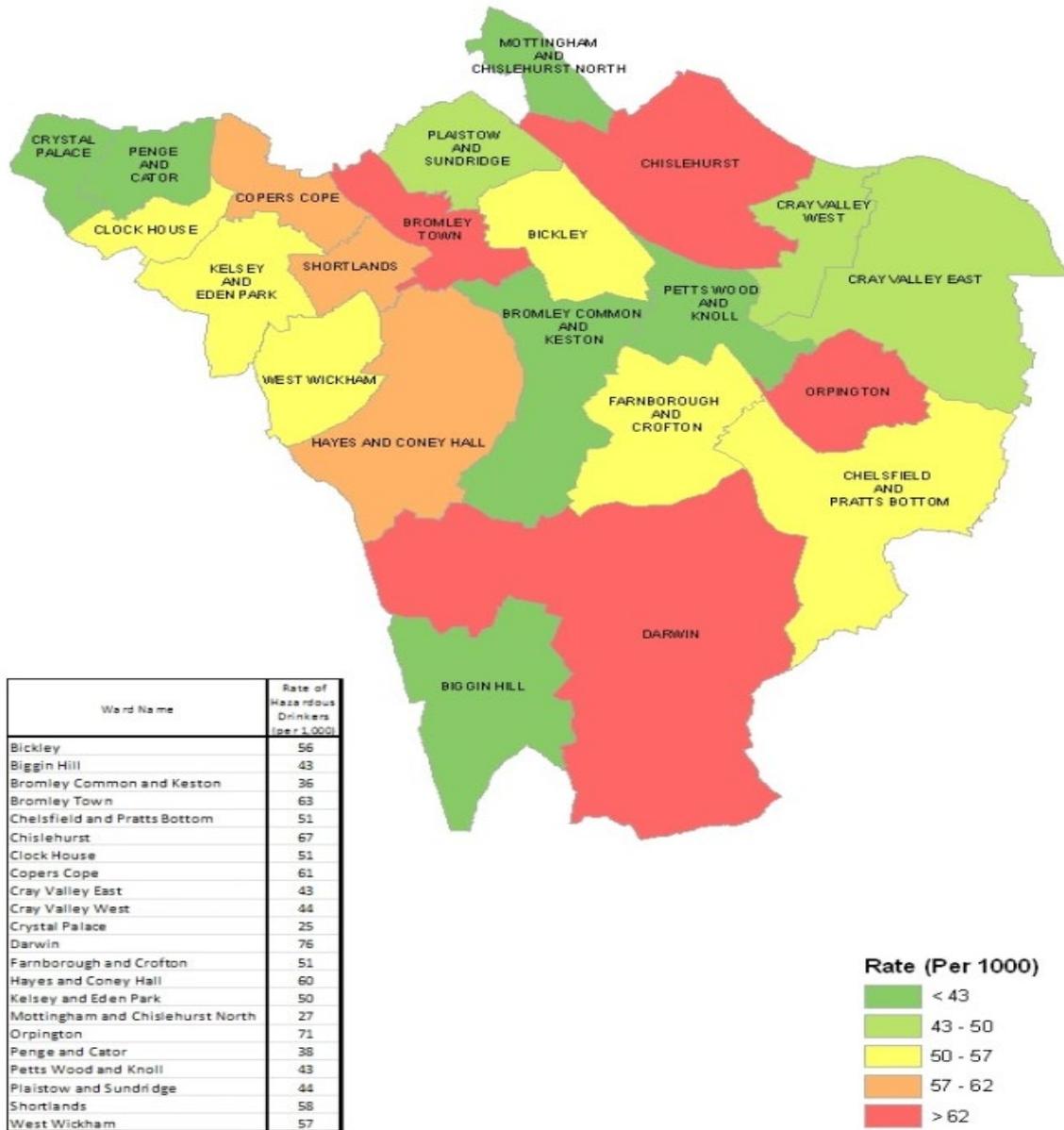
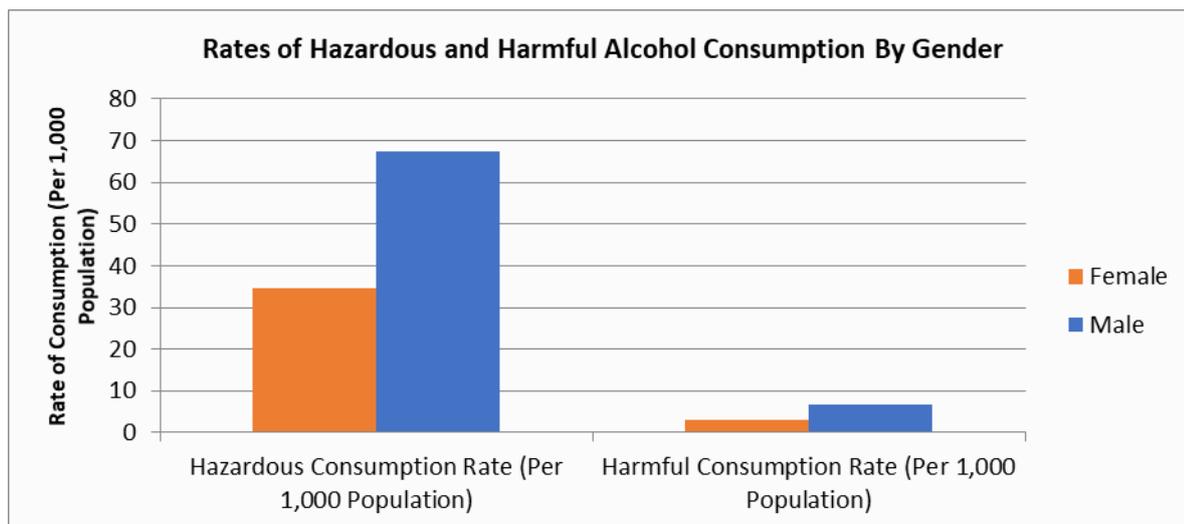


Figure 36 Rates of Hazardous and Harmful Alcohol consumption by gender, 2013



193. Hazardous drinking in Bromley affects both males and females but is particularly prevalent amongst men.

49 Harmful drinking

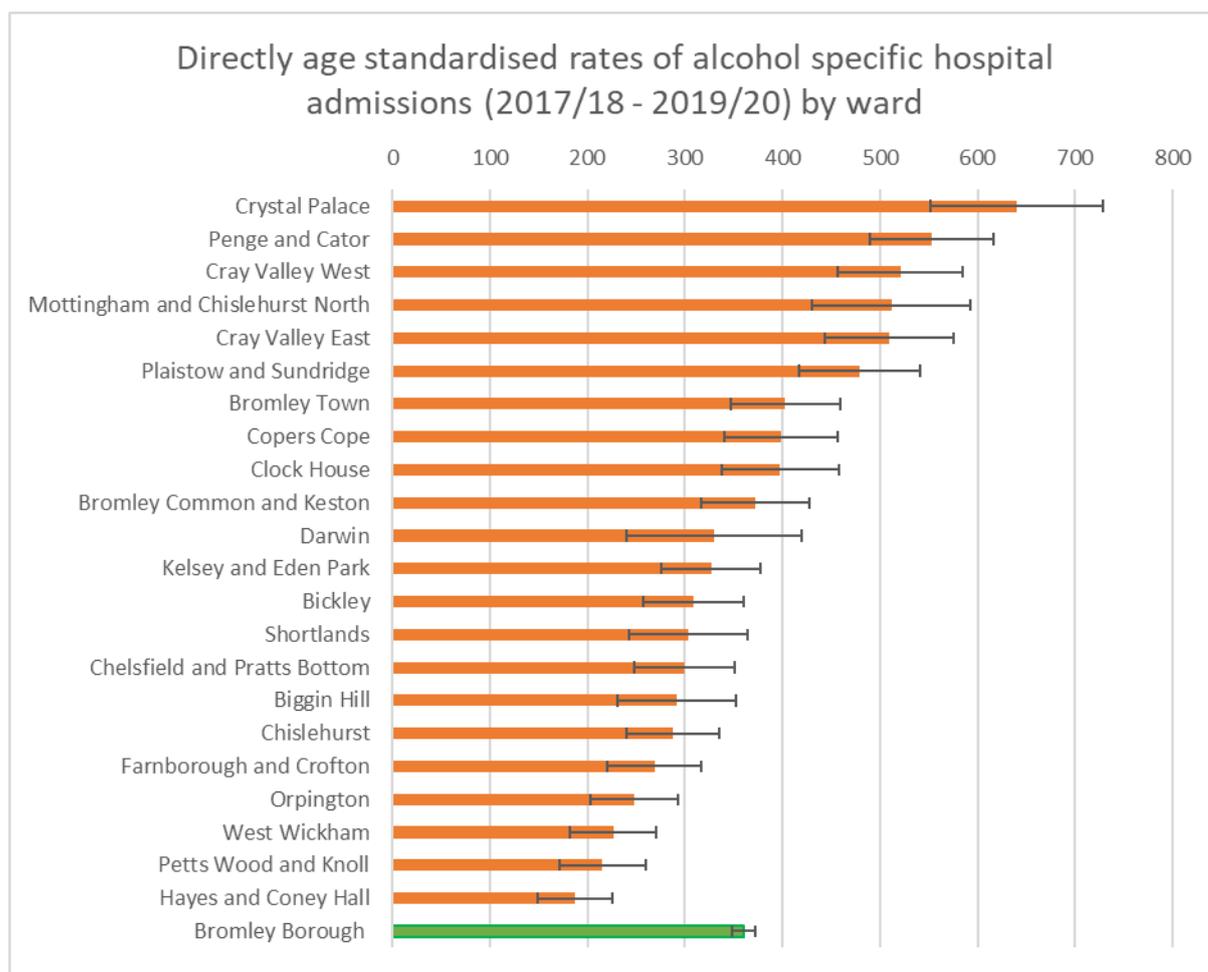
194. Alcohol-related harm is determined by the volume of alcohol consumed *and* the frequency of drinking occasions. As such, the risk of harm is directly related to levels and patterns of consumption. PHE assert that there can be a considerable lag between alcohol consumption and alcohol-related harms, particularly for chronic conditions where the lag can be many years. However, in terms of impact on violence in domestic settings and the night-time economy the role of alcohol is more immediate.

195. In January 2016 the Chief Medical Officer issued revised guidance on alcohol consumption, which advises that in order to keep to a low level of risk of alcohol-related harm, adults should drink no more than 14 units of alcohol a week. The table illustrates that in comparison to the national average, there is a higher percentage of adults in Bromley exceeding the 14-unit recommendation.

Figure 37 2011-2014 Health Survey for England data

	Bromley %	National %
Proportion of adults who abstain from drinking alcohol	12.5	15.5
Proportion of adults drinking less than 14 units per week	57	59.1
Proportion of adults drinking more than 14 units per week	30.7	25.7

Figure 38 Figure 4. HES Alcohol-specific Hospital Admissions 2017-20 by Bromley Ward



196. The above table indicates a strong relationship was between harmful drinking and deprivation.

References:

1. Bromley Annual Public Health Report - Burden of Alcohol Consumption (2014)
2. Health Survey for England (2015)
3. HES (Hospital Episode Statistics), NHS Digital
4. Public Health Commissioning Packs – Adult Alcohol Commissioning Support Pack (2020-21).