

**List of persons/bodies consulted**

All responsible Authorities  
Ward and Parish Councillors  
Police and Crime Commissioner  
Community Associations  
Residents Associations  
Portman Group  
Institute of Licensing  
Both local MP's  
ACRE (Action with communities in Rural England)  
Association of Licensed Multiple Retailers  
British Beer and Pub Association  
Drink Aware  
Drink Sense  
Peterborough Prevention & Enforcement Services  
Peterborough Chamber of Commerce

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## Consultation on the Licensing Cumulative Impact Policy

Peterborough City Council are consulting on the current Cumulative Impact Policy in place for Millfield New England area known as 'Op Can Do' and invite your comments.

The consultation will run from 6 August 2018 to 23 September 2018. Should you wish to respond and make comment, please ensure that you do so prior to the end of the consultation period, to ensure your comments can be properly considered, prior to determination.

Any person who wishes to respond to the consultation may do so in the following manner:

In writing to: Peterborough City Council, Licensing Team Consultation Officer, Sand Martin House, Bittern Way, Fletton Quays, Peterborough, PE2 8TY

Or by email to: [lpc@peterborough.gov.uk](mailto:lpc@peterborough.gov.uk)

Please note: We are unable to accept verbal responses, however, should any person require any further information or clarification on the Cumulative Impact policy or the consultation process, please call 01733 747474.

Your comments will assist the council in determining if the current cumulative impact policy is still relevant to the present day situation in the Op Can Do area. A cumulative impact policy must be evidence based, therefore if the evidence no longer supports the policy, the policy must be removed from the overarching Statement of Licensing Policy, or amended in line with the evidence provided to address the current situation and problems identified.

Comments must relate to the effect that licensed premises are having, positive and/or negative and must relate to at least one of the four licensing objectives, which are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

Please be aware that comments which just state '*we do not need any more licensed premises in this area*' are not considered valid under the Licensing Act 2003. 'Need' concerns commercial demand and is a matter for the planning authority and market to determine.

The current cumulative impact policy including plan and named streets affected, can be found within section 11 of the overarching Statement of Licensing policy at the end of the link below.

<https://www.peterborough.gov.uk/business/licences-and-permits/licensing-act/>

The council determined to introduce the Cumulative Impact policy in the Op Can Do area in 2013, (following a consultation and review of the evidence received), as it could no longer be satisfied that the granting of further licenses in this area, would be consistent with the authority's duty to promote the licensing objectives. (See link below for further information)

<http://democracy.peterborough.gov.uk/ieListDocuments.aspx?CId=142&MId=2936&Ver=4>

A Cumulative Impact policy helps 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. It creates a rebuttable presumption, meaning that applications which receive valid objection(s) are unlikely to be granted, unless the applicant can demonstrate that the granting of the application will not further add to the issues identified.

A review of the Statement of Licensing Policy, including the Cumulative Impact policy took place in 2015. Sufficient evidence existed at that time to indicate that the cumulative impact policy was still required and the policy remained in place. (See link below for further information)

<http://democracy.peterborough.gov.uk/ieListDocuments.aspx?CId=142&MId=3528&Ver=4>

Following the introduction of the Policing and Crime Act 2017, the council is required to review the cumulative impact policy every three years, to ensure it remains relevant to the current situation in the identified area.

(Continued over)

Your views and comments are invited, to enable the council to determine if the current cumulative impact policy is still relevant to the present day situation in the Millfield New England area known as Op Can Do. This is your opportunity to inform the council about how you are affected positively or negatively, by licensed premises in this area.

You may be of the opinion that the policy should remain in place as you continue to experience problems relevant to the accumulation of licensed premises in this area. If so, it would be helpful if you could include details of what you experienced, including if and who you reported the problem to, including any reference number you were given.

Or, you may have the opinion that licensed premises have a beneficial effect on the area and in general. That the issues previously raised to implement the policy no longer exist, therefore, the cumulative impact policy should no longer apply. This would mean that applications in the Op Can Do area would be subject to the same determination process as applications elsewhere in Peterborough.

You may have the opinion that a cumulative impact policy is still required, but is currently too wide and should not apply to a type of premises. For example, premises which provide licensable activities on the premises, as they can promote community cohesion and are under the control of the licence holder. So the policy should be amended and targeted to only apply to applications which provide off sales of alcohol and late night refreshment off the premises, or that it should only apply to new applications which include the sale of alcohol, etc. as they will exacerbate existing issues.

All responses will be properly considered along with any supporting statistical and evidential data, prior to determination of the policy.

Please note:

- Cumulative Impact policies relate to new and variation applications and cannot be used to revoke existing authorisations.
- Each application is determined on its own merits.
- Section 14.39 of Section 182 guidance states:  
*'When publishing a CIA a licensing authority is required to set out evidence of problems that are being caused or exacerbated by the cumulative impact of licensed premises in the area described. The evidence is used to justify the statement in the CIA that it is likely that granting further premises licences and/or club premises certificates in that area (limited to a kind described in the assessment), would be inconsistent with the authority's duty to promote the licensing objectives.'*

Please read the consultation document and respond prior to 23 September 2018 with your comments.

## 11. CUMULATIVE IMPACT

- 11.1 The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter which the Council can consider within its licensing policy statement. This should not, however, be confused with 'need' which concerns the commercial demand for a particular type of premises, e.g. a pub, restaurant or hotel. The issue of 'need' is therefore primarily a matter for the market to decide and does not form part of this licensing policy statement.
- 11.2 The licensing authority can only adopt a special policy on cumulative impact if there is evidence that a significant number of licensed premises concentrated in one area is causing a cumulative impact on one or more of the licensing objectives.
- 11.3 Following concerns as to the perceived saturation of licensed premises in the area known as Op Can Do attached as Appendix 1 with a list of streets attached as Appendix 2, the licensing committee approved the consultation of a review of the Statement of Licensing Policy to include a special policy in that area.
- 11.4 The following steps were undertaken by the licensing authority in considering whether to adopt a special policy on cumulative impact for the Op Can Do area:
- Identified concern about the negative impact on the licensing objectives
  - Considered whether there is evidence to support the concerns identified that crime and disorder and nuisance is occurring and is associated with licensed premises
  - Consulted with those specified in section 5(3) of the Licensing Act 2003, on the proposal for a special policy in relation to new applications and variations to existing premises licences and club premises certificates and considered the outcome of the consultation
  - Having considered the available evidence and undertaken consultation, the licensing authority determined that it is appropriate to control cumulative impact.

### **Special Policy on Cumulative Effect**

- 11.5 The Licensing Authority has adopted (following a meeting of the full council on 17 April 2013) a special policy relating to cumulative impact in respect to all licensed premises for the Op Can Do area. The special policy took effect on 18 April 2013.
- 11.6 This special policy creates a rebuttable presumption that applications within the Op Can Do area for new premises or club premises certificates or variations that are likely to add to the existing cumulative impact will normally be refused, if relevant representations are received about the cumulative impact on the licensing objectives, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced.
- 11.7 Applicants will need to address the special policy issues in their operating schedules in order to rebut such a presumption.
- 11.8 Despite the presumption against grant, responsible authorities and/or other persons will still need to make a relevant representation before the licensing authority may lawfully consider giving effect to its special policy i.e. if no representation is received, the application must be granted (subject to such conditions as are consistent with the Licensing Act 2003). Responsible authorities and other persons can make a written representation referring to information, which had been before the licensing authority when it developed its statement of licensing policy.
- 11.9 This licensing authority recognises that a special policy should never be absolute. The circumstances of each application will be considered properly and applications for licences and certificates that are unlikely to add to the cumulative impact on the licensing objectives may be granted. After receiving representations in relation to a new application or for a variation of a licence or certificate, the licensing authority will consider whether it would be justified in departing from its special policy in the light of the individual circumstances of the case. The impact can be expected to be different for premises with different styles and characteristics. If the licensing authority decides that an application should be refused, it will still need to show that the grant of the application would undermine the promotion of the licensing objectives and that appropriate conditions would be ineffective in preventing the problems involved.
- 11.10 A special policy will not be used as a ground for revoking an existing licence or certificate when representations are received about problems with those premises.

- 11.11 The “cumulative impact” on the promotion of the licensing objectives of a concentration of multiple licensed premises should only give rise to a relevant representation when an application for the grant or variation of a licence or certificate is being considered.
- 11.12 A review must relate specifically to individual premises, and by its nature, “cumulative impact” relates to the effect of a concentration of many premises. Identifying individual premises in the context of a review would inevitably be arbitrary.
- 11.13 A special policy relating to cumulative impact cannot justify, and will not include provisions for a terminal hour in a particular area or impose quotas - based on either the number of premises or the capacity of those premises.
- 11.14 This special policy will be reviewed regularly in line with the statutory requirements to review the Statement of Licensing Policy unless the licensing authority deems it appropriate to review in the interim period. Consultation will take place with those identified in 5.2 of the policy, responses can be based on intelligence such as;
- Health data including wider public health and local alcohol profiles for England (LAPE) data [www.lape.org.uk](http://www.lape.org.uk)
  - Data on alcohol related and alcohol specific hospital admissions, alcohol related deaths in the local area and the number of people in a structured alcohol treatment service.
  - Data about crime and disorder or nuisance occurring, or whether activities are a threat to public safety or children from harm.
  - If problems are occurring, to identify whether these problems are being caused by customers of licensed premises, or that the risk of cumulative impact is imminent.
  - Complaints and calls for service from residents or businesses
- 11.15 The absence of a special policy however, does not prevent any responsible authority or other persons making representations on a new application for the grant of a licence on the grounds that the premises will give rise to a negative cumulative impact on one or more of the licensing objectives.
- 11.16 Once away from licensed premises, a minority of consumers will behave badly and unlawfully. The licensing policy is part of a much wider strategy for addressing these problems. Other mechanisms both within and outside the licensing regime are available for addressing such issues. For example:
- Planning controls
  - Positive measures to create a safe and clean town centre environment in partnership with local businesses, transport operators and other departments of the local authority
  - The provision of CCTV surveillance in town centres, ample taxi ranks, provision of public conveniences open late at night, street cleaning and litter patrols.
  - Powers of local authorities to designate parts of the local authority area as Public Spaces Protection Orders. Confiscation of alcohol from adults and children in designated areas.
  - Police enforcement of the general law concerning disorder and antisocial behaviour, including the issuing of fixed penalty notices.
  - Prosecution for the offence of selling alcohol to a person who is drunk (or allowing such a sale).
  - Powers to close down instantly premises or temporary events to prevent a nuisance or disorder from continuing, recurring or occurring.
  - The power for responsible authorities and other persons to seek a review of a premises licence or club premises certificate.
- 11.17 The above may be supplemented by other local initiatives that seek to address these problems, for example through Safer Peterborough Partnership, in line with the strategic objectives for crime and disorder reduction in the city.

Map Showing Current CI Policy Area in Green

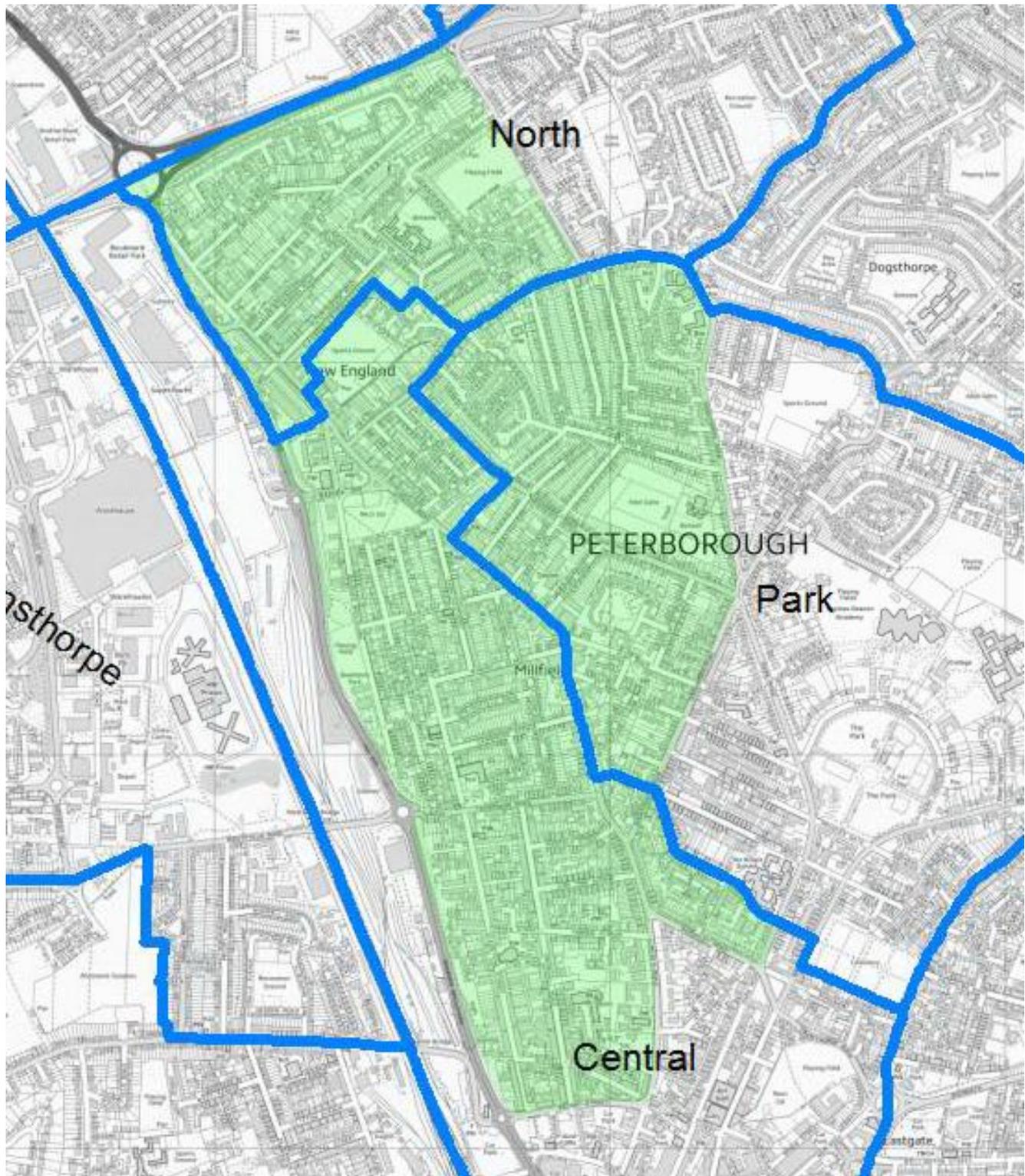


Table of Street Names Within the Current CI Area

Streets in the Op Can Do area		
Alexandra Road	Keats Way	1-359 Dogsthorpe Road
Allen Road	Keeton Road	40 - 50 Bright Street
Alma Road	Kipling Court	Beckets Close
Bamber Street	Lammas Road	Berry Court
Beech Avenue	Lawn Avenue	Boswell Close
Belham Road	Lime Tree Avenue	Burghley Mansions
Bourges Boulevard	Lincoln Road	Burns Close
Brassey Close	Link Road	Burrows Court
Brownlow Road	Lister Road	Carl Hall Court
Burghley Road	Lynton Road	Caroline Court
Burmer Road	Maskew Avenue	Cecil Pacey Court
Cambridge Avenue	Norfolk Street	Century Square
Cecil Road	North Street	Claridge Court
Chantry Close	Northfield Road	Coleridge Place
Chaucer Road	Norton Road	Connaught Mews
Church Walk	Nursery Close	Cromwell Court
Clare Road	Occupation Road	Dogsthorpe Grove
Clarence Road	Park Road	Dyson Close
Cobden Avenue	Parliament Street	Gillwell Mews
Cobden Street	Peveril Road	Gray Court
Cowper Road	Pope Way	Hamilton Court
Craig Street	Portland Avenue	Ingleborough
Cromwell Road	Russell Street	Johnson Walk
Crown Street	Scotney Street	Kimbolton Court
Dryden Road	Searjeant Street	Lincoln Gate
Eaglesthorpe	Shakespeare Avenue	Loire Court
English Street	Sheridan Road	Manor House Street
Exeter Road	Silverwood Road	Old Court Mews
Fitzwilliam Street	Springfield Road	Oxford Road
Foxdale	St James' Avenue	Parkodi Court
Fulbridge Road	St Mark's Street	Popley Court
Geneva Street	St Martins Street	'Raedwald Court
Gilpin Street	St Paul's Road	Rock Road
Gladstone Street	Stone Lane	Rosehall Court
Granville Street	Summerfield Road	Russell Mews
Green Lane	Taverners Road	Salaam Court
Hankey Street	Tennyson Road	Shelley Close
Harris Street	Thistle Moor Road	St Marks Apartments
Henry Court	Towler Street	St Marks Court
Henry Street	Vere Road	St Martins Mews
Herrick Close	Victoria street	The New Haven
Highbury Street	Warbon Avenue	Tom Lock Court
Windmill Street	Waterloo Road	up to 135 Park Road
Bamber Court	Wilberforce Road	Victoria Place
Walpole Court	York Road	

**NOTICES**

**Peterborough City Council**

Notice is given that the Council of the City of Peterborough has made Orders pursuant to section 14 of the Road Traffic Regulations Act 1984:

**The City of Peterborough Through Traffic Order 2018**  
 Temporary Prohibition of Through Traffic Order 2018  
 The effect of which is to stop any vehicle from proceeding along the road known as Peterborough Road as between The Green and Manor Farm Lane.  
 The Council is satisfied that traffic should be prohibited on proposed works being executed on the above road, the alternative route for vehicles affected by this order is via Peterborough Road, Love's Hill, Castor Road, Stamford Road, Helpston Road, Main Street, Peterborough Road and Viasa.  
 The proposed Order will come into force on the 13 August 2018 and will continue until the reinstatement works have been completed or until the 12 August 2019, whichever is the earlier. Closure dates will be confirmed locally on site.  
 It is anticipated that the works will take place between the 13 August 2018 and the 14 August 2018.  
 For further information please contact Auna Carr on 01522 341598.

**The City of Peterborough School Road Order 2018**  
 Temporary Prohibition of Through Traffic Order 2018  
 The effect of which is to stop any vehicle from proceeding along the road known as School Road as between the road known as School Road as between Stamford Road and Millstone Lane.  
 The Council is satisfied that traffic should be prohibited on proposed works being executed on the above road, the alternative route for vehicles affected by this order is via Stamford Road, Bainton Road, Jack Haws Lane and Viasa.  
 The proposed Order will come into force on the 13 August 2018 and will continue until the Stop Tap Repair works have been completed or until the 12 August 2019, whichever is the earlier. Closure dates will be confirmed locally on site.  
 It is anticipated that the works will take place between the 13 August 2018 and the 15 August 2018.  
 For further information please contact Karen Thompson on 01522 341600.

**The City of Peterborough School Lane Order 2018**  
 Temporary Prohibition of Through Traffic Order 2018  
 The effect of which is to stop any vehicle from proceeding along the road known as School Lane as between West End Road and High Street.  
 The Council is satisfied that traffic should be prohibited on proposed works being executed on the above road, the alternative route for vehicles affected by this order is via West End Road, Castle End Road, High Street and Viasa.  
 The proposed Order will come into force on the 13 August 2018 and will continue until the Patching works works have been completed or until the 12 August 2019, whichever is the earlier. Closure dates will be confirmed locally on site.  
 It is anticipated that the works will take place between the 13 August 2018 and the 14 August 2018.  
 For further information please contact Martin Benn on 01733 453531.

**The City of Peterborough West End Lane Order 2018**  
 Temporary Prohibition of Through Traffic Order 2018  
 The effect of which is to stop any vehicle from proceeding along the road known as West End Lane as between Tuckers Hook and Castle End Road.  
 The Council is satisfied that traffic should be prohibited on proposed works being executed on the above road, the alternative route for vehicles affected by this order is via Tuckers Hook, High Street, Castle End Road and Viasa.  
 The proposed Order will come into force on the 15 August 2018 and will continue until the Patching works works have been completed or until the 14 August 2019, whichever is the earlier. Closure dates will be confirmed locally on site.  
 It is anticipated that the works will take place between the 15 August 2018 and the 17 August 2018.  
 For further information please contact Martin Benn on 01733 453531.

**A copy of the Orders can be inspected at the following locations:**  
 Town Hall, Bridge Street, during normal office hours.  
 Destination Centre, Bridge Street or Central Library, Broadway, during normal opening times.  
 Simon Machen Director of Growth and Regeneration, 9 August 2018  
 RC2

**highways england**

**ROAD TRAFFIC REGULATION ACT 1984 - SECTION 14(1)(b) THE A1 TRUNK ROAD (CARPENTER'S LODGE JUNCTION, CITY OF PETERBOROUGH) TEMPORARY PROHIBITION OF TRAFFIC ORDER 201**

NOTICE IS HEREBY GIVEN that Highways England Company Limited (a) intends to make an Order on the A1 Trunk Road near Wothorpe to allow for traffic to travel in safety during the Burghley Horse Trials.

The traffic safety measures would require slip road closures which would be implemented any time between the hours of 7am and 12 midday, and from 1pm to 8.30pm between Thursday 30 August and Sunday 2 September 2018.  
 The effect of the Order would be to close the A1 northbound and southbound exit slip roads leading to the B1081 Lordon Road, at Carpenter's Lodge Junction during the times specified above.  
 The slip road closures would only be implemented to relieve traffic flow on the A1 and would be monitored and removed as soon as traffic flows reach an acceptable level. Northbound traffic wishing to use the slip road would continue north to exit the A1 at its junction with the A6121, then continue their journey using the A6121. Southbound traffic would be diverted via Barnack Drift and the B1443.

When traffic volumes are high, nearside lane closures would be in operation to allow the unrestricted access for traffic wishing to join the A1, except for at its junction with Withering Ford Road, Barnack, where access to the southbound carriageway of the A1 would be prohibited.  
 Any vehicle being used for police, fire and rescue authority, ambulance purposes and for traffic officer purposes would be exempt from the closures.  
 The slip road closures and diversion routes would be clearly signposted throughout the event.  
 The Order would come into force on 28 August 2018 and may continue in force for a maximum duration of eighteen months or until the event detailed above has ended, whichever is the earlier.

**Mrs V Tomkins, Highways England Company Limited**  
 (a) Registered in England and Wales under company no. 9346363. Registered office Bridge House, Walnut Tree Close, Guildford, Surrey, GU1 4LZ.  
**General enquiries** relating to this notice may be made in writing to Antony Rogers at Highways England Company Limited, Woodlands, Manton Lane, Bedford, MK41 7LW, by email to antony.rogers@highwaysengland.co.uk or by telephoning 0300 470 4690.

**NETWORK RAIL INFRASTRUCTURE LIMITED TRANSPORT AND WORKS ACT 1992**

Notice is hereby given under section 14(1)(a) of the Transport and Works Act 1992 (the 'Act') that the Secretary of State for Transport has determined under section 13(1) of the Act to make with modifications the Network Rail (Werrington, Grade Separation) Order (the Order). The Order was applied for by Network Rail Infrastructure Limited ('Network Rail') of 1 Eversholt Street, London, NW1 2DN.

The Order will authorise Network Rail to construct, maintain and operate a grade separated junction in the form of a "dive under" beneath the East Coast Main Line at Werrington Junction. The scheme would allow trains to transfer between the Stamford Lines and the Great Northern Great Eastern Line without crossing the East Coast Main Line on the level. The scheme is required to increase capacity on the East Coast Main Line. The Order will also authorise the compulsory acquisition and temporary use of land for the purposes of the scheme. Copies of the Order, once made, may be obtained from the Stationery Office or through booksellers.

The Secretary of State has, pursuant to section 14(1)(a) of the Act, given notice of this determination by way of a decision letter dated 24 July 2018, copies of which may be obtained from the TWA Orders Unit, Department for Transport, General Counsel's Office, Zone 1/18, Great Minster House, 33 Horseley Road, London SW1P 4DR. That letter gives the reasons for the determination and the considerations upon which it is based; information about the public participation process; and information regarding the right to challenge the validity of the determination and the procedures for doing so. It also describes the main adverse environmental effects possible, remedy any major adverse environmental effects. Winckworth Sherwood LLP, Solicitors and Parliamentary Agents, Minerva House, 5 Montague Close, London SE1 9BB, on behalf of Network Rail Infrastructure Limited, 9 August 2018

**Goods Vehicle Operator's Licence**

ANDREW WALKER trading as HARRY YEARSLEY LTD of YEARSLEY GOLD STORE, UNIT 7, FARADAY AVENUE, HAMS HALL, BIRMINGHAM, B46 1AL is applying for a licence to use HARRY YEARSLEY LTD, FELTON PARKWAY, PETERBOROUGH, PE7 3AG as an operating centre for 10 goods vehicles and 20 trailers. Owners or occupiers of land (including buildings) near the operating centre(s) who believe that their use or enjoyment of that land would be affected, should make written representations to the Traffic Commissioner at Hillcrest House, 386 Harehills Lane, Leeds, LS9 6NF, stating their reasons, within 21 days of this notice. Representatives must at the same time send a copy of their representations to the applicant at the address given at the top of this notice. A Guide to Making Representations is available from the Traffic Commissioner's office.

**Peterborough City Council**

**The City of Peterborough Through Traffic Order 2018**

Notice is given that the Council of the City of Peterborough intends in not less than seven days to make an Order pursuant to section 14 of the Road Traffic Regulations Act 1984, the effect of which is to stop any vehicle from proceeding along the roads as outlined in the Frank Perkins Parkway (LED) schedule below.  
 The Council is satisfied that traffic should be prohibited on proposed works being executed on the above road, the alternative routes for vehicles affected by this order are outlined in the schedule below.

Scheme Location	Diversion Route	Working Hours	Expected Works duration
A1139 Frank Perkins Parkway Junction 7 Off slip	Parwell Way, Oney Road and Eastfield Road	2000 -0600	From 20/8/18 for 70 nights
A1139 Frank Perkins Parkway Junction 7 On slip and Beongale	Oney Road, Eastfield Road and Beongale	2000 -0600	From 20/8/18 for 70 nights
A1139 Frank Perkins Parkway from J5 to J8 northbound	A1260 Nene Parkway, A47 Soke Parkway and A15 Paston Parkway	2000 -0600	From 20/8/18 for 70 nights
A1139 Frank Perkins Parkway from J8 to J5 Southbound	A15 Paston Parkway, A47 Soke Parkway, A1260 Nene Parkway	2000 -0600	From 20/8/18 for 70 nights

The proposed Order will come into force on the 20 August 2018 and will continue until the works have been completed or until the 19 August 2019, whichever is the earlier. Closure dates will be confirmed locally on site. It is anticipated that the works will take place between the 20 August 2018 and the 26 October 2018.  
 A copy of the Order can be inspected at the following locations:  
 Town Hall, Bridge Street, during normal office hours.  
 Destination Centre, Bridge Street or Central Library, Broadway, during normal opening times.  
 For further information please contact Martin Brooker on 01733 452691  
 Simon Machen Director of Growth and Regeneration 19-077 RC1 09 August 2018

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# Peterborough Cumulative Impact Assessment Review, September 2018

## 1. Introduction & Purpose

The Licensing Act 2003 and associated revised guidance issued under section 182<sup>1</sup> provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken in relation to licensable activities, which are defined by the Act as:

- The sale by retail of alcohol
- The supply of alcohol by or on behalf of a club to, or to the other of, a member of the club
- The provision of regulated entertainment
- The provision of late night refreshment

The statutory objectives, each of which are of equal importance, are:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- The protection of children from harm

The Act allows for licensing authorities to undertake a Cumulative Impact Assessment (CIA) to help it to limit the number or types of license 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 in a specified area. It is noted within the Act that, in some areas, the type or density of premises licensed to sell alcohol can lead to problems of nuisance and/or disorder, anti-social behaviour and higher rates of crime. Licensing authorities may therefore undertake a CIA in order to adopt a Cumulative Impact Policy (CIP) for a given area, creating a rebuttable presumption that applications for new premises licenses or major variations of existing licenses will be refused if representations are made about the likely impact of the proposals on the licensing objectives. This effectively requires the applicant to demonstrate that the operation of the premises will not add to the cumulative impact already prevalent within the area.

With reference to the aforementioned legislation, Peterborough City Council adopted on 18/04/2013 a CIP to cover the geographical area of 'Op CanDo', an area within the centre of Peterborough known to have a number of socio-economic issues including relatively high rates of relative deprivation and high rates of crime. The 'Op CanDo' project commenced in 2011, with an aim to facilitate work between a number of agencies and voluntary bodies to improve living conditions within the area.

The first CIA relating to the CanDo area was in 2013 and an update was produced in 2015. This report constitutes a third CIA relating to this area, in response to the aforementioned revised guidance to the Licensing Act 2003 published in April 2018.

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<sup>1</sup> Home Office 'Revised Guidance issued under section 182 of the Licensing Act 2003, [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/705588/Revised\\_guidance\\_issued\\_under\\_section\\_182\\_of\\_the\\_Licensing\\_Act\\_2003\\_\\_April\\_2018\\_.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/705588/Revised_guidance_issued_under_section_182_of_the_Licensing_Act_2003__April_2018_.pdf)

This report contains data in relation to:

- Relative socio-economic deprivation
- Types and locations of licensed premises
- Alcohol-related police incidents and crime statistics
- Alcohol-related hospital admissions
- Additional health-related alcohol indicators

It should be noted within this report that data in relation to the consumption of alcohol and alcohol related incidents/crimes are known to be imperfect for a number of reasons. For example, reported alcohol consumption typically accounts for only 40-60% of total alcohol sales<sup>2</sup>, suggesting substantial under-reporting of true levels of alcohol consumption.

Accurate data relating to alcohol-related crime is also dependent on consistency of reporting and documenting across areas; evidence suggests that some groups are reticent to report alcohol related crime<sup>3</sup> and that reporting of incidents/crimes and accurate documentation pertaining to the involvement of alcohol where appropriate is not consistent<sup>4</sup>.

Alcohol misuse is the biggest risk factor for death, ill-health and disability among 15-49 year olds in the UK and the fifth biggest risk factor across ages<sup>5</sup>. Alcohol is a causal factor in more than 60 medical conditions including mouth, throat, stomach, liver and breast cancers, high blood pressure, cirrhosis of the liver and depression and accounts for over 1 million hospital admissions per year. In total, it is estimated that alcohol harms are estimated to the cost the NHS approximately £3.5 billion per year<sup>5</sup>.

With regards to crime, victims believe the offender to be under the influence of alcohol in approximately 53% of all violent incidents, with alcohol related crime in the UK estimated to cost between £8 billion and £13 billion per year<sup>5</sup>.

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<sup>2</sup> <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4320509/>

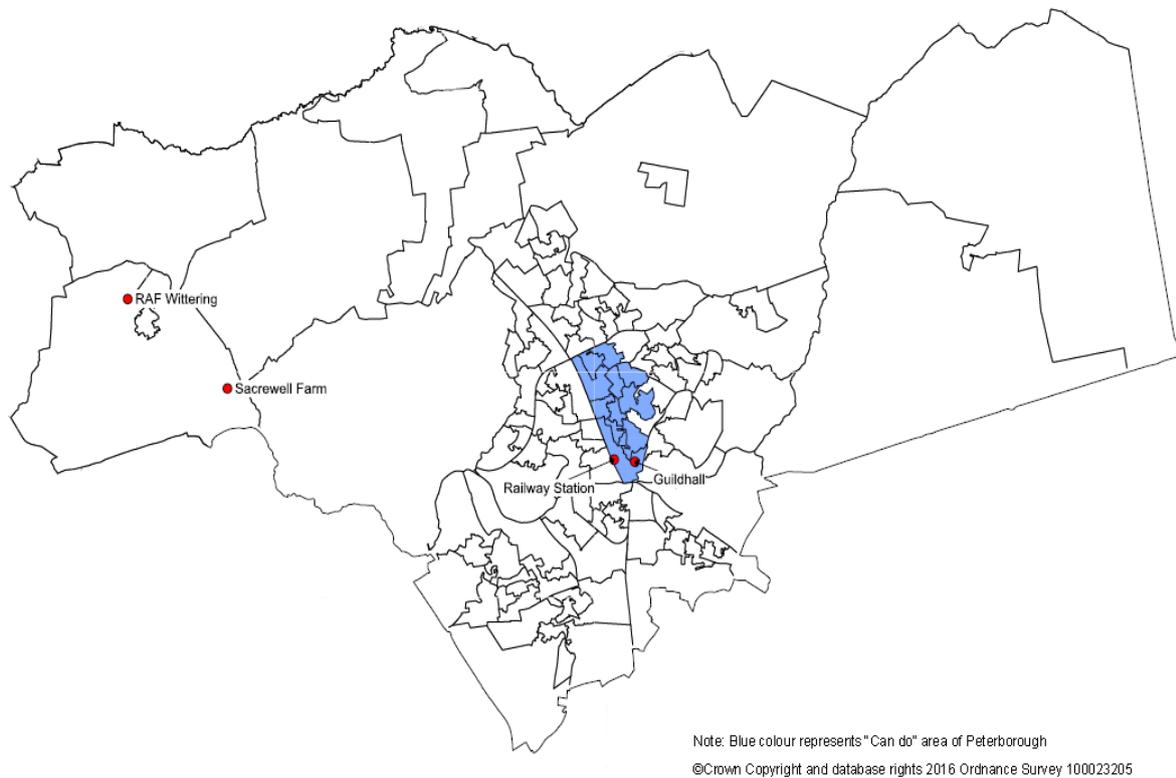
<sup>3</sup> <http://library.college.police.uk/docs/hoprbrf/brf701.pdf>

<sup>4</sup> <http://www.ias.org.uk/Alcohol-knowledge-centre/Crime-and-social-impacts/Factsheets/Alcohol-related-crime-in-the-UK-what-do-we-know.aspx>

<sup>5</sup> <https://www.alcoholconcern.org.uk/alcohol-statistics>

## 2. CanDo Area – Overview & Relative Deprivation

**Figure 1: Peterborough Lower Super Output Areas & CanDo Area**



**Source: Peterborough City Council Public Health Intelligence**

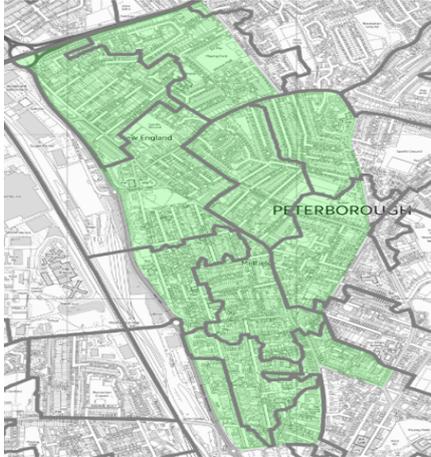
Lower Super Output Areas (LSOAs) are geographical areas with approximately 1,500 residents<sup>6</sup> that do not change over time and therefore allow for consistency of comparison across differing time periods. The majority of Peterborough's 112 LSOAs are within the urban, densely populated and relatively deprived centre of the city and of these, 11 overlap with the CanDo area, which encompasses elements of the Central, North and Park electoral wards. These 11 LSOAs are noted within the map above with blue shading and are mapped with a greater level of granularity in figure 2 below.

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[https://www.datadictionary.nhs.uk/data\\_dictionary/nhs\\_business\\_definitions/l/lower\\_layer\\_super\\_output\\_area\\_de.asp?shownav=1](https://www.datadictionary.nhs.uk/data_dictionary/nhs_business_definitions/l/lower_layer_super_output_area_de.asp?shownav=1)

**Figure 2: Peterborough CanDo Area LSOAs – Greater Granularity**



Source: Peterborough City Council Public Health Intelligence

**Figure 3: CanDo Area LSOAs – Index of Multiple Deprivation Rankings, 2015 - Overall**

LSOA code (2011)	Electoral Ward	IMD Score (Lower Score = Less Deprivation)	IMD Rank
E01015651	Park	17.6	40
E01015652	Park	31.0	67
E01015654	Park	39.7	82
E01015601	Central	41.1	85
E01015634	North	41.5	87
E01015599	Central	41.6	88
E01015632	North	43.4	92
E01015603	Central	47.8	99
E01015604	Central	47.9	100
E01015602	Central	47.9	101
E01015600	Central	48.1	102
<b>Peterborough Average</b>		<b>27.7</b>	-

Key: Peterborough LSOA Quintile Rankings

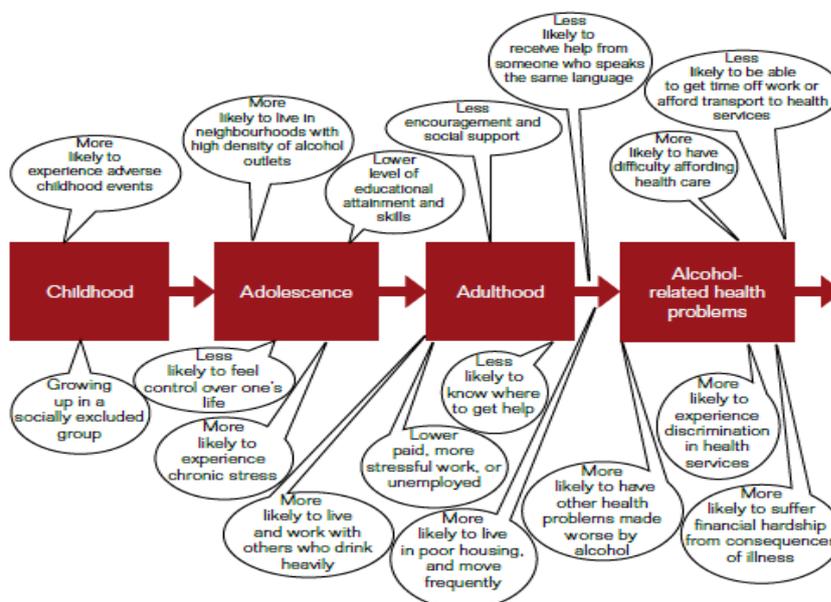
1-23 (In Least Deprived Quintile)	24-45	46-68	69-90	91-112 (In Most Deprived Quintile)
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Source: Index of Multiple Deprivation 2015

The Index of Multiple Deprivation (IMD), produced by the Department for Communities & Local Government in 2015<sup>7</sup> measure relative deprivation between small areas. Lower IMD scores indicate lower levels of relative deprivation whereas higher scores are indicative of higher levels of relative deprivation. As shown within figure 3, above, the CanDo area contains some of the most relatively deprived LSOAs in Peterborough, with 9 of 11 within the most deprived 40% of areas within the city.

The Institute of Alcohol Studies notes that the use of alcohol ‘can be seen as a contributing factor for almost 50% of the indicators within the Public Health Outcomes Framework for England. As such addressing alcohol-related harm could be a key route to improving public health and reducing general health inequalities’ and also that ‘lower socioeconomic status is associated with higher mortality for alcohol-attributable causes, despite lower socioeconomic groups often reporting lower levels of consumption’<sup>8</sup>. The figure below illustrates how inequities (differences in outcomes that are amenable through policy intervention and therefore deemed ‘unfair’) can compound over the course of a lifetime.

**Figure 4: The Compounding Effects of Inequities in Alcohol-related Harm over the Life Course**



Source: Alcohol and inequities, World Health Organization, [http://www.euro.who.int/\\_\\_data/assets/pdf\\_file/0003/247629/Alcohol-and-Inequities.pdf](http://www.euro.who.int/__data/assets/pdf_file/0003/247629/Alcohol-and-Inequities.pdf)

De Vocht et al (2016)<sup>9</sup> tested the impact of local alcohol licencing policies on reported crime rates in England and concluded that ‘local areas in England with more intense alcohol licencing policies and enforcement had a stronger decline in rates of violent crimes, sexual crimes and public order offences, at least in the period up to 2013, of the order of 4-6% greater compared with areas where these policies were not in place’ and also that ‘the intensity of local licencing policies and enforcement, defined as willingness to implement cumulative impact policies and refusal of licence applications, [is] associated with a stronger reduction in alcohol-related hospital admissions over time’.

<sup>7</sup> <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2015>

<sup>8</sup>

<http://www.ias.org.uk/uploads/pdf/IAS%20reports/IAS%20report%20Alcohol%20and%20health%20inequalities%20FULL.pdf>

<sup>9</sup> <https://jech.bmj.com/content/jech/71/2/137.full.pdf>

Figure 5: CanDo Area LSOAs – Index of Multiple Deprivation Rankings, 2015 – Individual Sub-Domains

LSOA code (2011)	LSOA name (2011)	Electoral Ward	Average of Ranks	Number of Ranks (of 16) in Worst	IMD	IDACI	IDAOP1	Income	Employment	Education, Skills & Training	Health Deprivation & Disability	Crime	Barriers to Housing & Services	Living Environment	Adult Skills Domain	CYP Sub-Domain	Geographical Barriers Sub-Domain	Wider Barriers Sub-Domain	Indoors Barriers Sub-Domain	Outdoors Barriers Sub-Domain
E01015651	Peterborough 012B	Park	48	1	40	33	39	39	44	50	19	64	11	86	69	27	20	59	79	95
E01015652	Peterborough 012C	Park	72	6	67	50	81	57	54	100	42	91	24	104	106	74	9	79	100	106
E01015654	Peterborough 012E	Park	78	5	82	78	86	76	74	66	101	110	34	107	70	58	7	90	108	104
E01015634	Peterborough 008E	North	80	7	87	93	98	91	84	101	76	105	55	59	102	90	27	91	56	68
E01015599	Peterborough 014A	Central	85	7	88	69	104	79	73	86	80	109	78	99	101	75	12	109	98	99
E01015632	Peterborough 010C	North	85	9	92	86	88	82	81	107	50	107	46	102	104	109	14	97	99	103
E01015601	Peterborough 012A	Central	86	8	85	67	111	84	67	102	75	97	74	106	109	73	2	110	103	105
E01015602	Peterborough 014C	Central	86	8	101	86	62	77	91	89	77	112	54	112	75	104	15	100	111	112
E01015604	Peterborough 010B	Central	91	9	100	76	112	95	83	112	79	88	82	95	112	111	3	112	89	102
E01015600	Peterborough 014B	Central	91	10	102	79	106	91	88	110	84	85	79	101	111	106	1	111	95	107
E01015603	Peterborough 010A	Central	93	10	99	89	102	90	77	108	78	103	75	110	107	107	18	107	110	108

Key: Peterborough LSOA Quintile Rankings

1-23 (In Least Deprived Quintile)	24-45	46-68	69-90	91-112 (In Most Deprived Quintile)
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Source: Index of Multiple Deprivation 2015

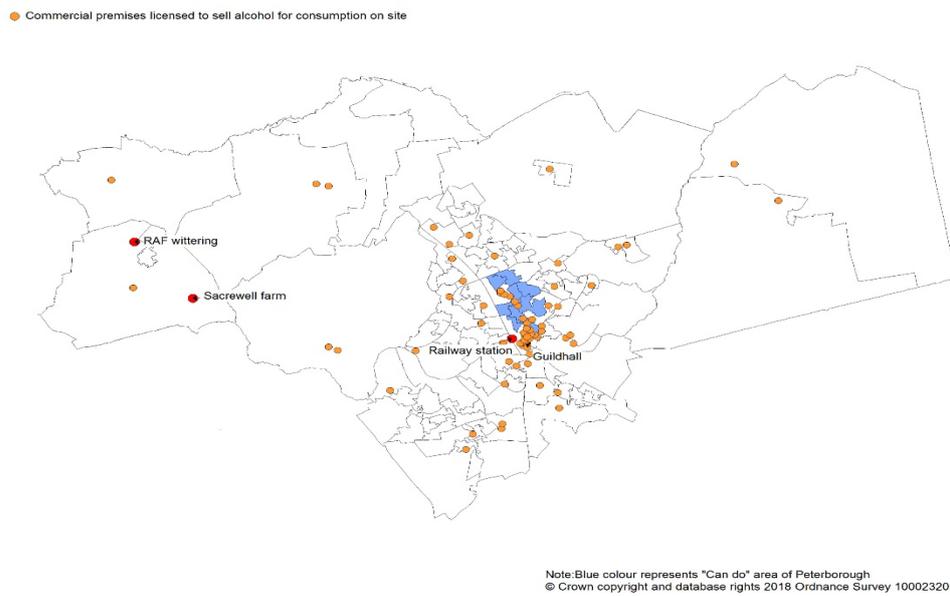
Overall IMD values are comprised of a number of sub-domains, which are listed within the figure above. Of note with reference to the licensing objectives within the Licensing Act 2003 is that all 11 LSOAs within this analysis are within the 40% of Peterborough LSOAs with worst outcomes for the 'Crime' IMD sub-domain, and 8 of 11 (72.7%) are within the worst 20% of Peterborough LSOAs for this sub-domain.

The figure above illustrates a wide level of relative deprivation within the CanDo area across a number of areas, the exception being the 'geographical barriers' sub-domain which measures proximity to local services such as GPs, schools, supermarkets and post offices, which are prevalent in large numbers within this area.

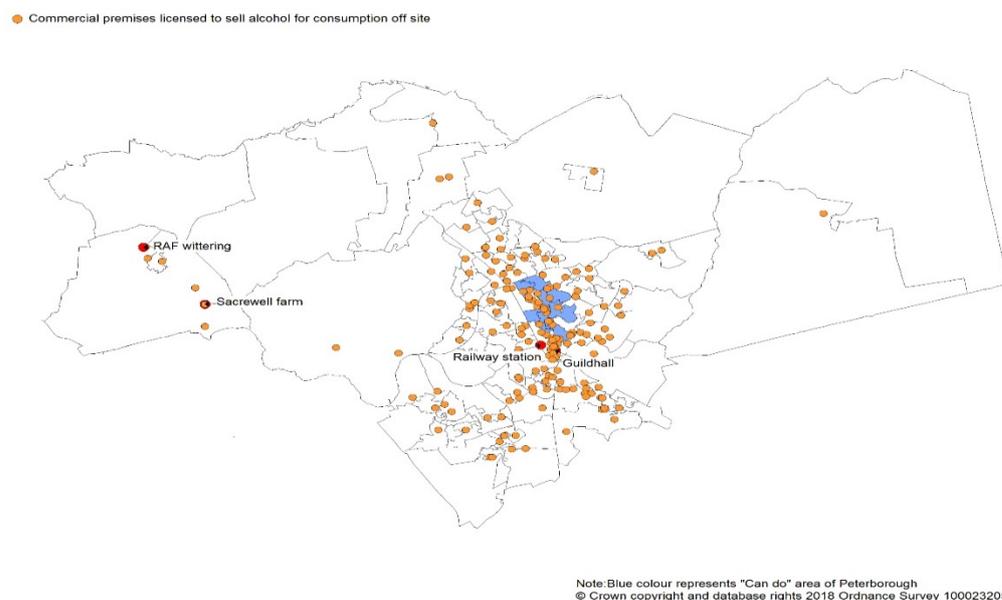
### 3. Overview of Licensed Premises

The four figures below show the locations of licensed premises in Peterborough (for sale for on-site consumption, off-site consumption, on-site and –offsite consumption and late night entertainment/refreshment license but no authorisation to sell alcohol).

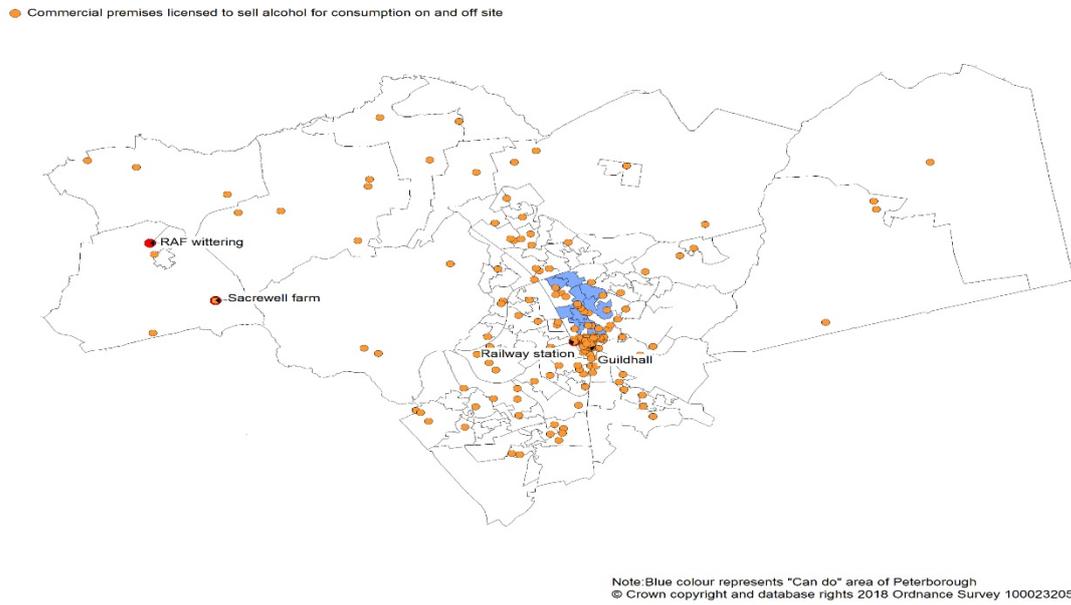
**Figure 6: Premises in Peterborough with a license to sell alcohol for on-site consumption**



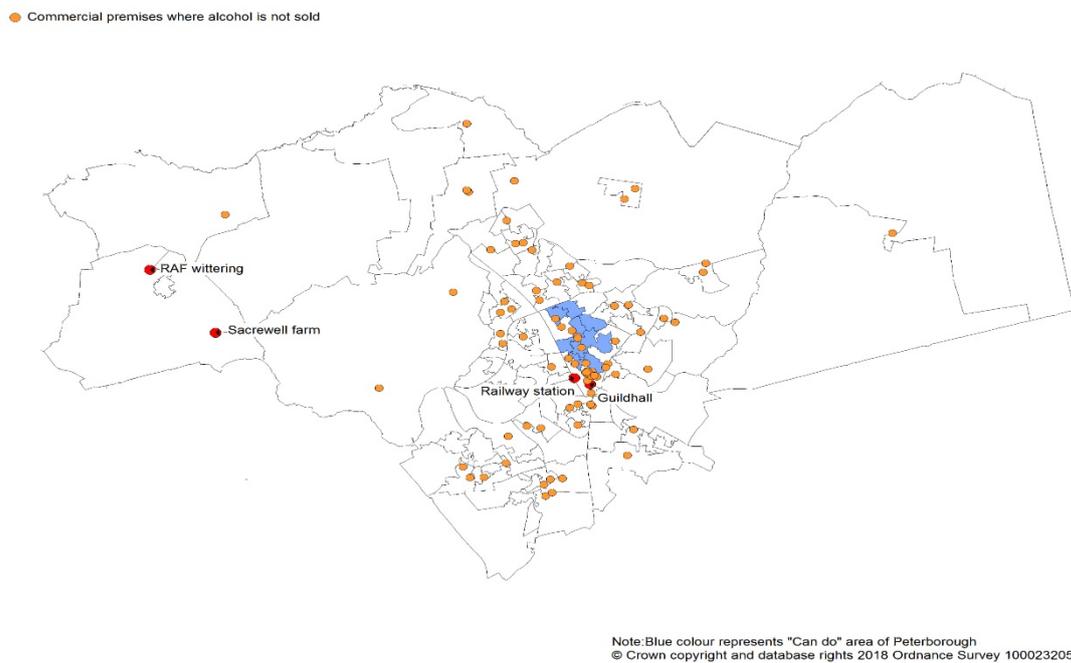
**Figure 7: Premises in Peterborough with a license to sell alcohol for off-site consumption**



**Figure 8: Premises in Peterborough with a license to sell alcohol for both on-site and off-site consumption**



**Figure 9: Premises in Peterborough with a late night entertainment/refreshment license but no authorisation to sell alcohol**



**Figure 10: CanDo Area Licensed Premises Data – 2015 – 2018 Comparison**

Type Of Premises	2015	2018	+/- Since CIA Renewal 2015 (Number)	+/- Since CIA Renewal 2015 (Percentage)
On License	12	14	2	16.7%
Off License	29	35	6	15.4%
On and Off Sales	16	24	8	25.8%
No Alcohol Sold	16	27	11	42.3%
Total	73	100	27	22.7%

Source: Peterborough City Council internal licensing data

Since the renewal of the last CIA in 2015, the number of premises licensed to sell alcohol in the CanDo area has increased from 73 to 100, an increase of 27 premises (22.7%). All types of license (license to sell alcohol for consumption on the premises, license to sell alcohol for consumption off the premises, license to sell alcohol both on and off the premises and no alcohol sold) have shown increases.

**Figure 11: CanDo Area LSOA Alcohol Licensing Data & Premises Selling Alcohol per Square Kilometre**

LSOA	LSOA Size (km/2)	License Type						All Premises Selling Alcohol per sq/km	Rank of All Premises Selling Alcohol per sq/km (1 = lowest, 112 = highest)
		On	Off	On and Off	Alcohol not sold	All Licences Held	All Premises Selling Alcohol		
E01015634	0.33	0	0	0	0	0	0	0	1=
E01015604	0.25	0	0	0	0	0	0	0	1=
E01015651	0.36	0	1	1	0	2	2	5.6	68
E01015654	0.59	1	2	4	0	7	7	11.9	98
E01015600	0.16	0	2	0	0	2	2	12.5	100
E01015632	0.29	0	2	2	1	5	4	13.8	102
E01015603	0.63	4	7	4	4	19	15	23.8	107
E01015652	0.26	1	5	2	3	11	8	30.8	108
E01015601	0.21	0	5	2	6	13	7	33.3	109
E01015599	0.9	13	11	33	9	66	57	63.3	111
E01015602	0.41	10	10	22	12	54	42	102.4	112
Total	4.39	29	45	70	35	179	144	32.8	-

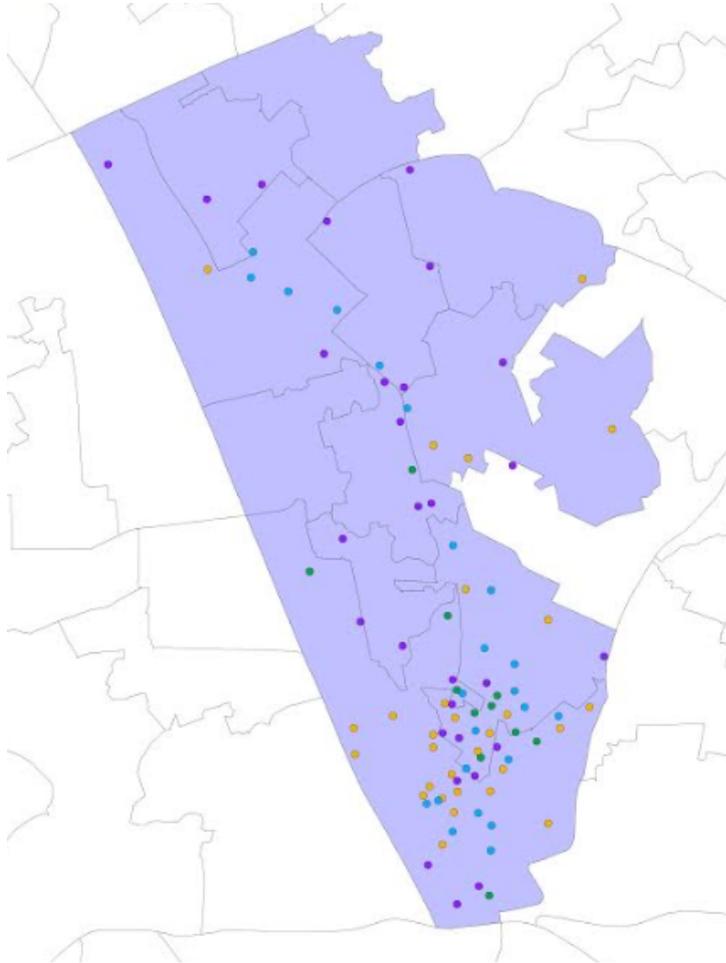
Source: Peterborough City Council internal licensing data

It should be noted that total licensing numbers within the figure above incorporate all licenses held within LSOAs that overlap with the CanDo area and therefore differ from values provided in figure 10, which refer specifically to the CanDo area.

Data show that five of the six LSOAs in Peterborough with the highest number of premises licensed to sell alcohol per square kilometre all overlap with the Cando area, as noted within the table above (LSOAs with ranks of 107, 108, 109, 111 & 112). LSOA E01015602 has 42 premises licensed to sell alcohol and a total area size of 0.41 sq/km, which equates to 102.4 premises licensed to sell alcohol per square kilometre.

There is clear evidence that levels of public violence and disorder are correlated with the density of licensed premises<sup>10</sup>, therefore the very high density of existing licensed premises in the CanDo area is directly relevant to the licensing objectives.

**Figure 12: CanDo Area LSOAs – Licensed Premises by Type**



Source: Peterborough Public Health Intelligence/Peterborough City Council Internal Licensing Data

The map above shows the location of all licensed premises within the CanDo area, illustrating the density of licensed premises within the area, particularly towards the south of the locality boundary.

**In total, there are 179 licensed premises within the CanDo area, comprised of:**

**29 premises licensed to sell alcohol for consumption on the premises (blue dots)**

**45 premises licensed to sell alcohol for consumption off the premises (purple dots)**

**70 premises licensed to sell alcohol for consumption both on and off the premises (yellow dots)**

**35 premises with a late night entertainment/refreshment license but no authorisation to sell alcohol (green dots)**

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<sup>10</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/733108/alcohol\\_public\\_health\\_burden\\_evidence\\_review\\_update\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733108/alcohol_public_health_burden_evidence_review_update_2018.pdf)

#### 4. Alcohol-related Incidents & Crime

Caution is advised when interpreting alcohol-related crime data as analysis relies upon the robust and consistent application of ‘alcohol markers’ across differing areas. An alcohol marker is a flag applied to an incident where alcohol is noted to be involved. Consideration should also be given with regards to related offences which may show a duplicate alcohol presence - for example, if an offender is arrested for an offence and then found to be in possession of cannabis, this report would include two individual offences with an alcohol marker applied.

It should be noted that within the below data, ‘CanDo Area’ is used to denote the sum total of three areas used in Cambridgeshire Constabulary police reporting: ‘North’, ‘Park’ and ‘East Central North’. These three areas include the CanDo area but are not exactly coterminous to the CanDo area and therefore the true number of incidents/crimes noted as being within CanDo will be smaller than presented within this dataset.

Alcohol-related incidents refer to a request for police services where alcohol is noted to be a related cause, whereas alcohol-related crime refers to incidents where sufficient evidence is obtained to proceed with prosecution.

**Figure 13: Alcohol-related incidents reported in CanDo & Peterborough, 2013/14 – 2017/18**

Area						% Change 13/14 - 17/18
	13/14	14/15	15/16	16/17	17/18	
CanDo Area	788	702	753	742	625	-20.7%
Other Areas of Peterborough	2,978	2,587	2,755	3,237	3,017	1.3%
Total	3,766	3,289	3,508	3,979	3,642	-3.3%

Source: Cambridgeshire Constabulary internal data

The number of alcohol-related incidents in the CanDo area of Peterborough has reduced between 2013/14 and 2017/18 from 788 to 625, a reduction of 20.7%. Over the same time period, there was an increase in alcohol-related incidents reported in all other areas of Peterborough of 1.3% (from 2,978 to 3,017). The overall number of alcohol-related incidents in Peterborough has fallen over this period by 3.3% (from 3,766 to 3,642). In 2013/14, the CanDo area accounted for 20.9% of all alcohol-related incidents in Peterborough (788/3,766), whereas in 2017/18 this percentage has reduced to 17.2% of all alcohol-related incidents (625/3,642). This is due to the substantial decrease in incidents within the CanDo area whereas the number of incidents within other areas of Peterborough has remained relatively stable over this period.

**Figure 14: Alcohol-related crime reported in CanDo & Peterborough, 2013/14 – 2017/18**

Area						% Change 13/14 - 17/18
	13/14	14/15	15/16	16/17	17/18	
CanDo Area	71	246	301	324	270	280.3%
Other Areas of Peterborough	387	1,211	1,720	1,869	1,821	370.5%
Total	458	1,457	2,021	2,193	2,091	356.6%

Source: Cambridgeshire Constabulary internal data

Alcohol-related crime in Peterborough has increased between 2013/14 and 2017/18, both within the CanDo area and within other areas of Peterborough. Within the CanDo area, the observed increase is 280.3% (From 71 to 270 crimes), whereas in all other areas of Peterborough, the increase is larger (370.5%, from 387 to 1,821 crimes). The overall increase for Peterborough is therefore

356.6% (from 458 to 2,091 crimes). Although alcohol-related crime has increased in the CanDo area, the increase has been greater in other areas of Peterborough.

The centre of Peterborough, including the CanDo area, is the subject of a Public Space Protection Order (PSPO) as a result of observed high levels of anti-social behaviour within the area. The PSPO application made by Peterborough City Council specifically references a number of issues prevalent within the area that effect quality of life, health and wellbeing, including anti-social behaviour specifically caused by the use of alcohol, anti-social behaviour caused by groups, begging, urination/defecation in open spaces, unauthorised and unsafe cycling, littering and spitting.

It was noted within this PSPO application that between the dates of 01/01/2014 and 26/07/2016, there were 946 reported anti-social behaviour incidents reported to the police in relation to the city centre of Peterborough, of which 268 (28.3%) were related to alcohol.

## 5. Alcohol-related Hospital Admissions

**Figure 15: Alcohol-related hospital admissions, Greater Peterborough General Practices, 2016/17 – 2017/18**

General Practice	Ward - Geographically Located Within	Ward - Majority Population Registered Within	2016/17				2017/18			
			Number of admissions	Directly age-standardised rate per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval	Number of admissions	Directly age-standardised rate per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval
Ailsworth Medical Centre	Glington & Wittering	Glington & Wittering	14	332.9	180.9	560.1	9	198.0	89.9	376.6
Boroughbury Medical Centre	Central	Data not held	143	578.9	487.6	682.2	162	668.2	569.1	779.6
Botolph Bridge Community Health	Fletton	Fletton	14	251.5	129.7	433.5	17	271.0	141.6	457.1
Bretton Medical Practice	Bretton North	Bretton North	74	674.6	527.2	849.9	59	539.2	408.5	697.9
Central Medical Centre	Park	Data not held	47	536.7	366.1	748.9	47	656.5	444.3	920.3
Dogsthorpe Medical Centre	Welland	Welland	11	270.6	106.4	529.2	19	652.3	342.0	1,090.0
Hampton Health	Orton & Hampton	Orton & Hampton	37	913.0	583.8	1,333.7	19	302.7	160.3	503.4
Hodgson Medical Centre	Werrington North	Werrington North	<5	60.6	12.0	177.5	6	137.5	45.3	308.3
Huntly Grove Practice	Park	Park	8	407.0	173.2	805.6	8	371.2	150.7	747.1
Jenner Health Centre	N/A (Outside Peterborough UA)	N/A (Outside Peterborough UA)	23	300.9	189.4	453.2	19	245.2	147.2	383.6
Minster Practice	Park	Data not held	14	361.9	196.7	608.5	14	332.2	180.6	558.7
Nene Valley Medical Practice	Orton Longueville	Orton Longueville	42	349.7	250.6	474.6	43	371.1	267.0	501.9
Old Fletton Surgery	Fletton	Fletton	58	497.1	376.5	643.8	74	624.1	488.9	784.9

General Practice	Ward - Geographically Located Within	Ward - Majority Population Registered Within	2016/17				2017/18			
			Number of admissions	Directly age-standardised rate per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval	Number of admissions	Directly age-standardised rate per 100,000	Lower 95% Confidence Interval	Upper 95% Confidence Interval
Orton Bushfield Medical Practice	Orton Waterville	Orton Waterville	30	576.4	385.8	827.0	31	592.2	397.2	847.3
Oundle	N/A (Outside Peterborough UA)	N/A (Outside Peterborough UA)	33	302.9	203.7	431.6	35	305.4	208.7	430.0
Parnwell Medical Centre	East	East	43	483.0	348.5	651.9	41	506.5	361.5	689.6
Paston Health Centre	Paston	Paston	85	651.7	518.5	808.2	78	594.3	467.2	744.7
New Queen Street Surgery	N/A (Outside Peterborough UA)	N/A (Outside Peterborough UA)	75	424.5	333.5	532.5	79	437.8	346.3	545.9
The Grange Medical Centre	West	West	12	513.0	242.2	931.0	11	572.8	271.8	1,046.6
Thistlemoor Medical Centre	North	North	86	476.7	364.6	608.4	76	444.9	342.8	566.1
Thomas Walker	Park	Park	45	651.9	474.5	873.4	34	476.4	328.8	667.2
Thorney	Eye & Thorney	Eye & Thorney	22	260.7	162.9	395.2	25	315.7	203.7	466.7
Thorpe Road Surgery	West	West	19	350.3	208.0	551.1	22	346.5	214.2	528.6
Wansford Surgery	N/A (Outside Peterborough UA)	N/A (Outside Peterborough UA)	25	303.1	194.9	449.0	10	124.7	57.6	232.8
Welland Medical Practice	Dogsthorpe	Dogsthorpe	13	330.2	165.9	579.4	22	730.3	438.1	1,132.5
Westgate	Central	Central	31	276.0	181.4	399.9	54	477.2	351.2	631.4
Westwood Clinic	Ravensthorpe	Ravensthorpe	50	1,079.8	792.9	1,434.0	44	950.0	683.3	1,284.1
Yaxley Group Practice	N/A (Outside Peterborough UA)	N/A (Outside Peterborough UA)	57	364.6	275.8	472.7	40	257.4	183.7	350.9
Greater Peterborough	-	-	1,114	455.0	428.3	482.9	1,098	442.7	416.6	470.1

Source: Hospital Episode Statistics

Key:

Ward contains parts of CanDo Area
Statistically significantly lower (better) than Greater Peterborough average
Statistically similar to Greater Peterborough average
Statistically significantly higher (worse) than Greater Peterborough average

The figure above shows directly age-standardised alcohol-related hospital admission rates for patients registered with Greater Peterborough GPs for 2016/17 and 2017/18. Direct age-standardisation is a statistical process whereby the potentially confounding effects of age differences between populations are eradicated via reference to a standard population (in this case,

the European Standard Population<sup>11</sup>.) Green shading refers to a directly age-standardised rate that is statistically significantly lower (better) than the Greater Peterborough average, whereas conversely, red shading illustrates a directly age-standardised rate that is statistically significantly higher (worse) than the Greater Peterborough average.

An alcohol-specific admission is defined as an admission to hospital where the primary diagnosis or any of the secondary diagnoses are an alcohol-attributable code.

Orange shading illustrates that a GP is either geographically located within or has a majority population registered within a 'CanDo area' electoral ward (Central, Park or North).

Seven GPs are geographically located within either Central, Park or North: Boroughbury Medical Centre, Central Medical Centre, Huntly Grove Practice, Minster Practice, Thistlemoor Medical Centre, Thomas Walker and Westgate. Of these practices, we also hold data that indicate that four practices have a majority of their registered population living within either Central, Park or North: Huntly Grove, Thistlemoor, Thomas Walker and Westgate.

Of these practices, Westgate has a statistically significantly low directly age-standardised rate of admissions for 2016/17 and is statistically similar to the Greater Peterborough average for 2017/18. Boroughbury Medical Centre is statistically significantly higher than the Greater Peterborough average for both 2016/17 and 2017/18. Boroughbury Medical Centre also has the highest observed number of admissions of any practice within Greater Peterborough for each year, with 143 admissions in 2016/17 and 162 in 2017/18. The Institute for Economic Affairs estimated the average cost of an alcohol-related hospital admission in 2015 to be £2,525 in 2015<sup>12</sup>. Applying bank of England inflation rates of 1.7% between 2015 and 2016 and 5.4% between 2015 and 2017, this equates to a 2016/17 average cost of £2,567.93 and a 2017/18 average cost of £2,661.35.

Alcohol-related hospital admissions for Boroughbury Medical Centre therefore accounted for a cost of (£2,567.93 x 143) £367,213.99 in 2016/17 and (£2,661.35 x 162) £431,138.70 in 2017/18, an overall total of £798,352.69, illustrating the cost to the local economy of high levels of alcohol consumption in and around areas of Peterborough including the CanDo area.

It should be noted that caution should be exercised in drawing correlation between alcohol-related hospital admissions and issues relevant to the licensing objectives, as perpetrators of alcohol-related incidents/crimes, irrespective of location, may be registered with any GP within the area.

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<sup>11</sup> <https://www.causesofdeath.org/docs/standard.pdf>

<sup>12</sup>

[http://www.iea.org.uk/sites/default/files/publications/files/DP\\_Alcohol%20and%20the%20public%20purse\\_63\\_amended2\\_web.pdf](http://www.iea.org.uk/sites/default/files/publications/files/DP_Alcohol%20and%20the%20public%20purse_63_amended2_web.pdf)

## 6. Additional Public Health Data – Alcohol-related Health Outcomes in Peterborough

**Figure 16: Key Alcohol Indicators from Local Alcohol Profile, Peterborough**

Indicator	Time Period	Peterborough	England	Peterborough Status
10.06 - Hospital admission episodes for alcohol-related conditions (Narrow) - Under 40s, Persons, directly age-standardised rate per 100,000	2016/17	350	301	Statistically significantly higher (worse) than England
10.06 - Hospital admission episodes for alcohol-related conditions (Narrow) - Under 40s, Males, directly age-standardised rate per 100,000	2016/17	419	353	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Persons, directly age-standardised rate per 100,000	2016/17	71	47	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Males, directly age-standardised rate per 100,000	2016/17	55	40	Statistically significantly higher (worse) than England
10.05 - Hospital admission episodes for intentional self-poisoning by and exposure to alcohol conditions (Narrow) - Females, directly age-standardised rate per 100,000	2016/17	88	54	Statistically significantly higher (worse) than England
9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Persons, directly age-standardised rate per 100,000	2016/17	1,211	1,127	Statistically significantly higher (worse) than England
9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Males, directly age-standardised rate per 100,000	2016/17	1,747	1,633	Statistically significantly higher (worse) than England
9.03 Hospital admission episodes for alcohol-related cardiovascular disease conditions (Broad) - Females, directly age-standardised rate per 100,000	2016/17	778	718	Statistically significantly higher (worse) than England
12.01 - Alcohol related road traffic accidents, crude rate per 1,000	2014-16	46	27	Statistically significantly higher (worse) than England
17.01 - Volume of pure alcohol sold through the off-trade, crude rate (litres per adult)	2014	7.2	5.5	Statistically significantly higher (worse) than England

Source: Local Alcohol Profiles for England, Public Health England, <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

The table above outlines 10 indicators within Public Health England’s ‘Local Alcohol Profiles for England’ where Peterborough’s outcome is statistically significantly higher (therefore worse) than the England average. These data demonstrate that Peterborough currently has statistically significantly high rates of:

- Hospital admissions for alcohol-related conditions in under 40s (all persons and males only)
- Hospital admissions as a result of intentional self-poisoning by and exposure to alcohol conditions (all persons, males only and females only)
- Hospital admissions for alcohol-related cardiovascular disease conditions (all persons, males only and females only)
- Alcohol related road traffic accidents
- The volume of pure alcohol sold through ‘the off-trade’ (e.g. supermarkets, independent retailers rather than bars/restaurants) is statistically significantly higher in Peterborough than England

As noted within the two figures below, Peterborough is the only area within the East of England region to have a statistically significantly high directly age-standardised rate of hospital admission episodes for alcohol-related conditions (narrow) in under 40s for all persons and for males.

**Figure 17: Admission Episodes for Alcohol-related Conditions (Narrow) – Under 40 (Persons), 2016/17, East of England Local Authorities**

**10.06 - Admission episodes for alcohol-related conditions (Narrow) - Under 40s (Persons) 2016/17**

Directly standardised rate - per 100,000

Area	Recent Trend	Count	Value	95% Lower CI	95% Upper CI
England	–	81,162	301	299	303
East of England region	–	7,358	263	257	269
Thurrock	–	162	191	162	222
Hertfordshire	–	1,216	218	205	230
Central Bedfordshire	–	300	233	208	261
Southend-on-Sea	–	203	247	214	284
Essex	–	1,686	264	252	277
Cambridgeshire	–	873	275	257	294
Norfolk	–	1,053	281	264	299
Suffolk	–	886	289	270	308
Bedford	–	235	298	261	338
Luton	–	383	306	276	338
Peterborough	–	360	350	314	388

Source: Calculated by Public Health England: Risk Factors Intelligence (RFI) team using data from NHS Digital - Hospital Episode Statistics (HES) and Office for National Statistics (ONS) - Mid Year Population Estimates.

Source: Local Alcohol Profiles for England, Public Health England, <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

**Figure 18: Admission Episodes for Alcohol-related Conditions (Narrow) – Under 40 (Male), 2016/17, East of England Local Authorities**

**10.06 - Admission episodes for alcohol-related conditions (Narrow) - Under 40s (Male) 2016/17** Directly standardised rate - per 100,000

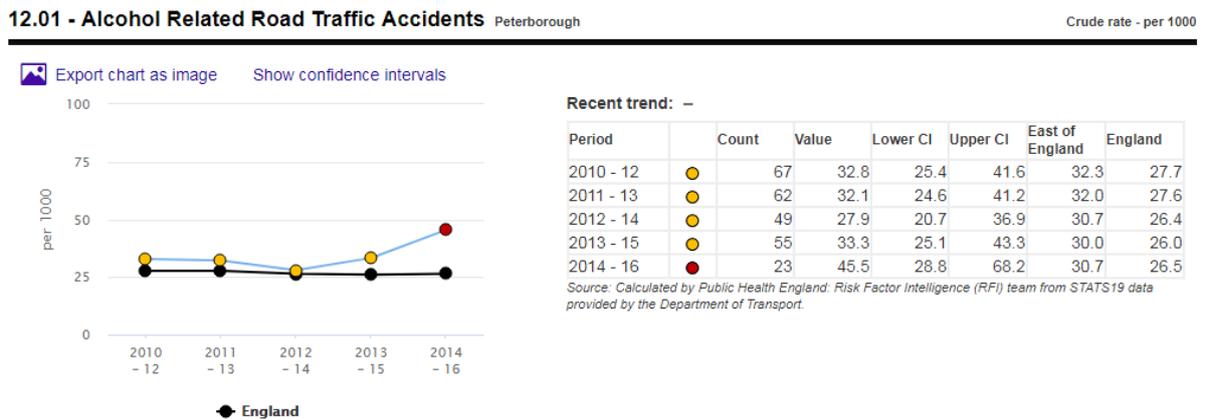
Area	Recent Trend	Count	Value	95% Lower CI	95% Upper CI
England	–	47,957	353	350	356
East of England region	–	4,227	300	291	309
Thurrock	–	104	254	207	308
Hertfordshire	–	738	268	249	288
Central Bedfordshire	–	169	263	224	306
Southend-on-Sea	–	108	266	218	322
Essex	–	926	291	272	310
Cambridgeshire	–	497	306	279	334
Norfolk	–	610	322	297	349
Suffolk	–	479	304	277	333
Bedford	–	148	381	322	447
Luton	–	227	352	307	401
Peterborough	–	221	419	365	478

Source: Calculated by Public Health England: Risk Factors Intelligence (RFI) team using data from NHS Digital - Hospital Episode Statistics (HES) and Office for National Statistics (ONS) - Mid Year Population Estimates.

Source: Local Alcohol Profiles for England, Public Health England, <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

The table below illustrates that, for the 2014-16 pooled period, the crude rate per 1,000 accidents of alcohol-related road traffic accidents in Peterborough (defined as an accident in which at least one driver failed a breathalyser test) rose to be statistically significantly higher than the national average for the first time. The observed number of such instances fell between 2013-15 and 2014-16 from 55 to 23, but as a proportion of all accidents, the number defined as alcohol-related has risen in Peterborough.

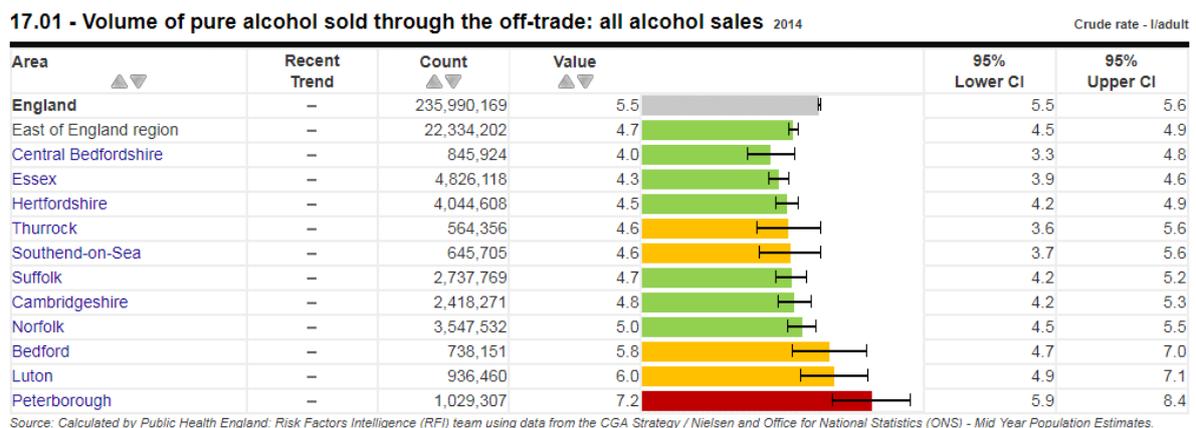
**Figure 19: Alcohol Related Road Traffic Accidents, Peterborough Trend, 2010-12 – 2014-16**



Source: Local Alcohol Profiles for England, Public Health England, <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

Peterborough is also the only area within the East of England region with a statistically significantly high volume of pure alcohol sold through the off-trade relative to England. In Peterborough, the crude rate of such sales is 7.2 litres per adult, compared to the national average of 5.5 litres.

**Figure 20: Volume of Pure Alcohol Sold through the Off-Trade: 2014, East of England Local Authorities**



Source: Local Alcohol Profiles for England, Public Health England, <https://fingertips.phe.org.uk/profile/local-alcohol-profiles>

Report prepared by:  
Public Health Intelligence  
Peterborough City Council  
September 2018

**APPENDIX E**

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**Peterborough**

**PE1 2QT**

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**07572 463536**

Peterborough City Council  
Licensing Team Consultation Officer  
Sand Martin House  
Bittern Way  
Fletton Quays  
Peterborough  
PE2 8TY

17<sup>th</sup> September 2018

Dear Sir/Madam

As one of the Ward councillors for the Op Can Do Area (Park Ward), and on behalf of the Labour Councillors in Park, Central, and North Wards; I am writing to you to express my great concern about any relaxation of the Cumulative Impact Policy for this area.

I receive frequent complaints from local residents about the negative impact of the sale and consumption of cheap alcohol on the quality of life in the surrounding area, and how this contributes to anti-social behaviour and crime. Unfortunately, many of the incidents referred to have not been reported to the Police or have not been responded to by them. However, they are very real and are having a negative impact on the lives of local residents.

Of particular concern are off-sales of cheap alcohol, canned and bottled beers and spirits. The ease of availability means that people are able to buy large quantities of alcohol and consume these in the streets and local greenspaces. It is my understanding that there are 35 off licences and a further 24 on & off sales outlets. This is way in excess of what could be considered an appropriate density.

The presence of drunk individuals can be intimidating for people, particularly when their behaviour is aggressive and unpredictable. It is having a negative impact on the use of public spaces such as Victoria Gardens and Central Park, where groups of drinkers are now a common sight.

I have received a number of reports from local residents of street drinkers urinating in public (both in local streets in the Millfield area and in Central Park), and my own experience bears this out as being a growing problem.

In some cases those buying and/or drinking this alcohol are also drug users, and this is exacerbating the problem.

The associated littering is now a problem of epidemic proportions. Throughout the Ward, streets are full of discarded cans and bottles. Despite the best efforts of the Amey street cleansing team and litterpicks coordinated by Park Ward Labour Councillors and community associations including Community First; we are losing the battle.

I consider it essential that the Cumulative Impact Policy remains in place. Clearly, the bulk of the problems outlined above are associated with “off sales and late night refreshment”, as opposed to “licensable activities on the premises”, and so retaining controls over the former would be my red line. Local residents expect nothing less of their local councillor than to stand up for them on this issue.

Yours faithfully,

**Cllr Richard Ferris**

**Park Ward Labour Team**

**On behalf of the Labour councillors listed:**

**Councillor Shaz Nawaz, Park Ward**

**Councillor Aasiyah Joseph, Park Ward**

**Councillor Mohammed Jamil, Central Ward**

**Councillor Amjad Iqbal, Central Ward**

**Councillor Mahboob Hussain, Central Ward**

**Councillor Ansar Ali, North Ward**

A Cumulative Impact Policy (CIP) is defined within Section 182 Guidance to the Licensing Act 2003; Section 14 – Statement of Licensing Policy; Paragraphs 14.20 to 14.46.

A CIP has been adopted by the Local Authority since 2013 and covers the CAN-DO area. This is the second review of this Policy. The Constabulary has been consulted on this Policy and has worked with partners in formulating this review document.

Local Authority Licensing & Police Licensing along with other partners such as Trading Standards, UKBA and HMRC have worked together to improve standards within the CAN-DO area specifically around alcohol licensing, and enforced against the sale of counterfeit and illicit alcohol & cigarettes, forced labour or employing illegal immigrants and subsequent tax evasion.

Following the introduction of the CIP in 2013 Local Authority Licensing & Police Licensing carried out comprehensive compliance inspections of all licensed premises within the CAN-DO area offering advice and guidance, and taking action where necessary to deal with licensees not complying with the licensing objectives. This early intervention sent out a clear message that any sales of alcohol in contravention of the licensing objectives or condition set on the Premises License would be dealt with pro-actively in accordance with the Licensing Act 2003.

Progressively over the years a new standard was set within alcohol licensing within the CAN-DO area, which has been maintained by the partnership between responsible authorities and licensees. Mediation with prospective applicants has led to significant improvements in the standard of license applications such that conditions are being set that would suggest that the premises would not impact or contribute towards the cumulative impact in the area. Where applicants weren't so informed or co-operative, representations have been made and sent to the Licensing Sub-Committee for them to make the final determination.

It is clear from the introduction of the CIP that application submissions and operating standards have significantly improved. We now see that applicants are routinely adding a condition where beer, lager or cider above 6.5% Abv would not be sold at the premises, a reduction in operating hours and significant CCTV conditions.

The Police Licensing, Local Authority Licensing and partners continue to monitor and regulate licensing within the CAN-DO area amongst other areas. I believe this course of action, supported by the CIP has allowed us to define a set standard and maintain it, and as such we have seen a positive uptake from Licensees and their contracted representatives.

The CIP sets a rebuttable presumption that applications for the grant or variation of premises licenses or club premises certificates which are likely to add to the existing cumulative impact will normally be refused or subject to certain limitations (following valid representation), unless the applicant can demonstrate within the operating schedule that there will be no negative cumulative impact on one or more of the licensing objectives. A valid representation must be made before a Sub-Committee with adequate information or evidence so that they can make an informed decision around refusing or accepting the application.

Routinely Police Licensing will mediate with applicants, in partnership with other responsible authorities, and where the desired standards are met, such that it is believed that the applicant will not impact on the cumulative problems, will not make any representation.

Crime data submitted by the Police Licensing Officer is limited and may not reflect a true and accurate picture of how alcohol is impacting the area that is CAN-DO. CAN-DO fits within 3

larger Police sectors namely North, Park and Central North. The data provided is a percentage data picture for the combined sectors rather than CAN-DO alone. We can see that alcohol related incidents have significantly reduced, whereas alcohol related crime has increased, more so in other areas of Peterborough compared to CAN-DO.

This increase may be due in part to the Police Licensing drive internally to ensure crimes and incidents are accurately tagged with alcohol markers, and the improvement in Police Crime / Incident reporting standards.

Police Licensing has seen a marked decline in information and intelligence, incidents and crimes directly attributed to licensed premises. Whilst residents may be anecdotally informing other partners, this information is not being relayed back to the Licensing Authority and as such providing the valuable information / intelligence needed to proactively deal with problem premises. This may be because it is not being flagged in a specific way that would make it easier to find or that the general public are not routinely reporting problems directly to the Police. For example 'Street Drinking' reported to the Police between 01/04/2016 and 04/10/2018 amounts to 16 reports within Central North. We know that this is not an accurate figure. Similarly when we look at alcohol related violent crime the majority come back to residential or street addresses and do not directly correlate to a specific licensed premises.

Cambridgeshire Constabulary have been part of a CIP working group in relation to this review and have provided available data which has been included in the Cumulative Impact Assessment Review September 2018 document.

# Peterborough City Council Consultation on the Licensing Cumulative Impact Policy – August 2018



## Introduction

The British Beer & Pub Association is the UK's leading organisation representing the brewing and pub sector. Our members account for 90% of the beer sold in the UK and own around 20,000 of Britain's pubs.

The pub plays a vital role in community cohesion and social life in Britain. They remain one of the few places where communities can come together to socialise. The British pub has been part of people's lives for hundreds of years. First and foremost, they are businesses which serve their local communities and contribute much to the social life of each and every community. The pub sector has enormous potential to generate economic growth and create jobs. It can also play an important part in local regeneration projects and has been at the heart of the regeneration of many of our key towns and cities over the last fifteen years. A major study undertaken by Oxford Economics in 2018 clearly identifies the significant local impact of brewing and pubs. Currently over £1.5 billion is invested in the pub sector per annum. Indeed, pubs are labour-intensive businesses so this investment directly correlates to jobs. Pubs employ 600,000 people across the UK, often providing vital work in small towns and villages. Indeed, 45% of those employed in the sector are aged 16-24 providing a vital route to work and first career-step for many young people.

Across Britain, 30 million people visit Britain's pubs each month, with over 15 million people drinking beer.

## BBPA's Concerns and Objections to the Proposed Renewal of the Cumulative Impact Policy (CIP)

We are concerned that the proposal to renew the policy in place for the Millfield New England area without a proper examination of the statistical evidence for its continued existence and the impact of it on the late-night economy and, by direct link, the retail economy generally.

A licensing authority can only adopt, or continue to apply, a special policy on cumulative impact if there is evidence that a significant number of licensed premises concentrated in one area is causing a cumulative impact on one or more of the licensing objectives.

The consultation document recognises that any decision to continue the CIP must be evidence-based, and that if the evidence no longer supports the CIP, it should be removed from the Statement of Licensing Policy. However, the consultation does not set out any evidence for the continuation, neither in terms of its impact to date nor any need for it to remain in place.

Instead the consultation invites opinion as to the effectiveness or otherwise of the CIP. Subjective, personal opinion in itself does not constitute evidence for the purposes of considering the renewal the CIP. If the purpose of the consultation is actually a call for evidence, that purpose has not been made clear. We note that the Council's intention is to present any evidence collected via this consultation to the Licensing Committee, but failure to present that evidence to a wider audience removes the opportunity for interested parties to comment upon or challenge that evidence.

In offering an opinion, the BBPA would confirm that as noted in the Introduction above, pubs have many beneficial effects, both societal and economic, for the communities in which they are located. Un-evidenced renewal of the CIP would limit these benefits and particularly investment potential and the associated job creation.

The consultation (paragraph 11.16) sets out a number of other mechanisms for ensuring that the Council's licensing policy objectives can be achieved. Again, in the absence of evidence that supports the renewal of the CIP, we would consider that the existing mechanisms are adequate without the need for the CIP.

In the absence of evidence and a case supported by that evidence, we feel that the Council can have no other option than to remove the CIP. On that basis the BBPA objects to the renewal of the CIP.

**BBPA contact re this response:**

**Andrew Green, Policy Manager – Pub Operations**

**[agreen@beerandpub.com](mailto:agreen@beerandpub.com) / 0207 627 9144**

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The area of Millfield and New England which is also known as the CanDo area has been an area prone to suffer from the effects of alcohol-related anti social behaviour for many years, with Designated Public Places Orders (DPPO) implemented initially in 2007 and then added to/extended up to 2011.

DPPOs were orders that were applied for by Local Authorities but enforced by the Police. Officers were authorised to instruct individuals to surrender or dispose of their alcohol or disperse from an area if they were consuming alcohol and their behaviour was having or was likely to cause harassment, alarm and distress. However in 2014 the ASB, Crime & Policing Act introduced Public Spaces Protection Orders which replaced DPPOs. This new tool has enabled local authorities to implement orders with restrictions that can be used to tackle a number of quality of life issues (alcohol still included) and also enables LAs to authorise council officers to enforce breaches of the orders. In early 2017 Peterborough City Council's Prevention & Enforcement Service consulted on proposals to implement a PSPO for the Millfield, New England, Eastfield and Embankment area of the city.

Research found that during 1/1/2014-26/7/16, there were 2,546 reported ASB incidents to the Police in relation to the proposed Millfield, New England, Eastfield and Embankment PSPO area, 537 of which were alcohol related incidents. Alcohol related anti-social behaviour can include (but is not limited to):

- Causing harassment, alarm and distress
- Urination and defecation
- Littering
- Noise
- Excessive consumption of alcohol can also be contributing factors to criminal damage, begging and public order offences.

Further research identified that Millfield and New England (Central and Park wards) were within the top 15 LSOA areas in Peterborough for anti-social behaviour in 2016 (the Special Policy on Cumulative Effect for Millfield and New England was implemented in April 2013).

In January 2017 a public consultation was launched to see if there was support to replace the previous DPPOs within the Millfield and New England areas with a PSPO that could tackle a wider range of quality of life issues including alcohol-related ASB. There were a total of 51 respondents to the PSPO consultation survey who were asked questions in relation to each specific proposed condition. Responses were received with the vast majority in favour of each of the proposed conditions. 96% of respondents were in favour of a PSPO to be used to deter people urinating and defecating in a public place and 92% were in favour of the proposal to allow officers to disperse groups causing harassment, alarm or distress. 90% of respondents were supportive of the proposed condition to tackle littering and spitting. 88% were in favour of the use of a PSPO to control anti-social behaviour from people who have been consuming alcohol. Following consultation the PSPO for Millfield, New England, Eastfield and Embankment was implemented in June 2017.

Since the implementation of the CIA in 2013, our service has responded to the following alcohol related ASB issues:

1. The historical Clock Tower near the Triangle was boarded up following complaints to ward councillors, Police and the Council concerning people congregating and drinking, urinating, defecating within the recesses of the clock tower.
2. Complaints have been received by the Salvation Army charity shop on Lincoln Road in relation to staff and customers being accosted by drunks congregating in the bus shelter outside the store, as well as entering the store being abusive and inappropriate in their behaviour towards female staff.
3. Residents and ward councillors regularly report that Gladstone Park is being misused by drinkers and drug users.
4. The impact of street drinking, drugs and prostitution is regularly experienced by residents in the Burghley Rd area.

Other factors to consider:

1. From anecdotal information we are aware that issues concerning alcohol-related ASB are still occurring within the Millfield and New England area, but there is significant under reporting.
2. The frequency of cleansing for streets and open spaces in the CIA area is significantly higher in comparison to other areas of the city. This is partly attributable to the amount of alcohol related litter (bottles, cans) which pose a safety risk and degrade the area.
3. There is the concern that if the CIA is not continued in this area, there will not be the Police resources to tackle any increase in anti-social behaviour or crime in this area. Policing in the CanDo area has reduced from a dedicated team comprising a Sgt, 4 PCs and a team of PCSOs to a team which now comprises a Sgt, 2 PCs and a team of PCSOs which are tasked to Police the City Centre and whole of the PE1 area. Policing priorities and tasking has also changed considerably since the implementation of the CIA.

It is the recommendation of the Prevention & Enforcement Services that the existing CIA continues in the Millfield and New England area.

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**Dr Liz Robin**  
**Director of Public Health**  
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 Sand Martin House  
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 PE2 8TY

*By Email*

21<sup>st</sup> September 2018

Dear Licensing Team,

Thank you for your recent communication regarding the consultation on the Licensing Cumulative Impact Policy. As you will be aware, since April 2013, Directors of Public Health (DPH) have been included as Responsible Authorities under the Licensing Act 2003. Although the protection of public health is not a discrete licensing objective, it can be pertinent to each of the licensing objectives. The role of the DPH is to help promote the health and wellbeing of the local populations they serve. Promotion of the licencing objectives, which collectively seek to protect the quality of life for those who live and work in the vicinity of licensed premises and those who socialise in licensed premises is an important contribution to this.

I am writing in support of the continuation of the Cumulative Impact Policy (CIP) in place for the 'Op Can-Do' area of Peterborough. These comments have been formulated using relevant data and evidence, and guidance from Public Health England.

### **The impact of alcohol on health and wellbeing of Peterborough residents:**

Public Health England's evidence of review of the impact of alcohol and the effectiveness of alcohol control policies<sup>1</sup> states that alcohol is now the leading risk factor for ill-health, premature death and disability in people aged between 15 and 49, the fifth leading risk factor for ill-health across all age groups. Alcohol is known to be a cause of over 200 health conditions and has a number of social negative impacts, including loss of earnings or unemployment, family or relationship problems and problems with the law. Many of these harms affect both the drinker and those around them, including families, friends and strangers.

These harmful effects place considerable economic burden on the government and health system, and individuals affected; the Cabinet Office estimate placed the economic costs of alcohol in England at around £21 billion in 2012.

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<sup>1</sup> Public Health England, 2016. The Public Health Burden of Alcohol and the Effectiveness and Cost-Effectiveness of Alcohol Control Policies – an evidence review.



There are inequalities associated with alcohol-related harm, with children and young people with lower socioeconomic status all experiencing higher levels of alcohol-related harm. In the English population, rates of alcohol-specific and related mortality increase as levels of deprivation increase and alcohol-related liver disease is strongly related to socioeconomic gradient. This is particularly important in Peterborough which is one of the 20% most deprived districts/unitary authorities in England and where approximately 19% (8,500) of children live in low income families<sup>2</sup>. Inequalities also exist within Peterborough, with men living on average 8.4 years longer in the least deprived areas than those in the most deprived areas, including those within the current CIP area.

### **The link between alcohol outlet density and alcohol-related harms:**

A considerable body of research examines the relationship between alcohol outlet density (AOD) and alcohol-related harms. This shows that areas with more deprivation tend to have greater AOD which means that regulating the local availability of alcohol has the potential to reduce health inequalities<sup>1</sup>, which supports the use of the CIP in the 'Op Can-Do' area which has high levels of deprivation.

There is strong evidence for a relationship between AOD and problems associated with social disorder<sup>1</sup>. Although the relationship between AOD and alcohol consumption and alcohol-related harm is more complex and largely obtained from other countries, a number of systematic reviews have identified that higher levels of AOD are associated with greater alcohol consumption, alcohol related violence, injuries, alcohol-related road traffic crashes, sexually transmitted infections, child abuse and neglect and suicide. This evidence supports the use of policies, such as cumulative impact policies, to limit AOD within areas, particularly those of high deprivation, such as the 'Op Can-Do' area.

In addition, the National Institute for Health and Care Excellence (NICE) public health guideline on the prevention of alcohol-use disorders<sup>3</sup>, concludes that reducing the number of outlets selling it in a given area and the days and hours when it can be sold, is an effective way of reducing alcohol-related harm. The guidelines recommend that a cumulative impact policy should be used where an area is saturated with licensed premises and the evidence suggests that additional premises may affect the licensing objectives.

### **The need for a cumulative impact policy in the 'Op Can-Do' area:**

I support the need for a CIP in the 'Op Can-Do' area in line with the following licensing objectives:

#### **(i) *The prevention of crime and disorder:***

There is a high density of premises selling alcohol in the 'Op Can-Do' area with five of the six LSOAs in Peterborough with the highest alcohol outlet density overlapping with the 'Op Can-Do' area. There is strong evidence for a relationship between AOD and problems associated with social disorder<sup>1</sup> which affects the

<sup>2</sup> Public Health England, 2018. Local Authority Health Profile – Peterborough.

<sup>3</sup> National Institute for Health and Care Excellence, 2010. Public Health Guideline (PH24) – Alcohol-use disorders: prevention & National Institute for Health and Care Excellence, 2014. Evidence update 54 – a summary of selected new evidence relevant to NICE public health guidance 24.

health and wellbeing of a local population. The Index of Multiple Deprivation (2015) (IMD) shows that 8 out of the 11 LSOAs of the 'Op Can-Do' area are within the 20% worst in Peterborough for the crime sub-domain. In addition, the 'Op Can-Do' area is within an area subject to a Public Space Protection Order as a result of high levels of anti-social behaviour within the area. Minimising growth of AOD in this area is therefore important in preventing crime and disorder, and protecting the health and wellbeing of the local population.

**(ii) Public safety:**

Alcohol-related hospital admissions are a significant issue in Peterborough with many of the associated public health indicators being worse in Peterborough than the England average. This demonstrates that alcohol is affecting the health and safety of Peterborough residents. Alcohol related-road traffic accidents are statistically significantly worse than the England average indicating a clear public safety issue associated with alcohol in Peterborough. Minimising the availability of alcohol, especially in areas of high AOD such as the 'Op Can-Do' area, is therefore important to protect the health and safety of Peterborough residents and visitors.

**(iii) The protection of children from harm:**

Children and young people are more vulnerable to alcohol related harm. Families may be affected by alcohol in a variety of ways including violence, financial problems, absenteeism from school and disrupted relationships, and there is a strong relationship between alcohol misuse and child maltreatment<sup>1</sup>. A number of studies have identified that higher levels of AOD are associated with greater alcohol related consumption and alcohol-related harm, including those that affect children, such as violence. Minimising the growth of AOD in the 'Op Can-Do' area, an area of high deprivation in Peterborough, is therefore important to protect children from harm.

**Summary:**

Alcohol can have significant negative health, social and economic impacts on communities, many of which are heightened in areas of high alcohol outlet density, such as the 'Op Can-Do' area. In addition, there are inequalities associated with alcohol-related harm, with more deprived communities, such as those in the 'Op Can-Do' area experiencing greater levels of harms. In line with the licensing objectives outline above, I therefore support the continuation of the cumulative impact policy in this area and would urge the licensing authority to consider the use of cumulative impact policies in other areas where a need is identified, including areas with high alcohol outlet density and high levels of deprivation.



**Dr Liz Robin MBBS FFPH  
Director of Public Health  
Peterborough City Council**



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28th September 2018

Dear Licensing Committee/Team

My post is Head of Community Resilience and Integration, Cambridgeshire County Council and Peterborough City Council. I lead a team of Community Connectors whose main task is to keep close link with community groups with a view to improve community cohesion and prevent community tensions, where practicable.

I am making this submission as part of Cumulative Impact Policy review in Op Can-Do area.

The area has probably highest ratio of licensed premises selling alcohol in proximity of residential area in Peterborough. I understand the density is very high and in some context equates to 102.4 premises licensed to sell alcohol per square km (LSOA E1015602).

Bulk of Cohesion Team time which I lead is spent in engagement with community groups in Can-Do area as this area has disproportionate level of social challenges including fly tipping, drugs, substance abuse, alcohol abuse, overcrowdedness, domestic violence, hate crime and consequential community tensions. -

It is important to note that we work very closely with community and it is very clear that bulk of these issues go unreported for a variety of reasons including English language skills, lack of confidence in police or council capability to deal with the issues, frustrated acceptance of the undesirable situation etc. Some of these issues are directly linked to lack of available resources to deal or respond to the public complaints or given lower priority of response in comparison with other more serious issues.

I have attended resident meetings where residents openly commented about people urinating in their front gardens at night.

People in the area are fed up with the situation and those who can leave opt to move from the neighbourhood. Census figures are supportive of high level of 'White flight' which is referred to number of White British leaving certain areas.

The situation over the past years have relatively stabilised with the implementation of cumulative impact policy and the local residents are undoubtedly concerned that any relaxation will escalate the deterioration in their neighbourhood. Hence to my understanding, it is not surprising that 8 out of 9 Councillors in Can Do area have sent in their submission objecting to any such relaxation. Two of the most active resident groups in the area including Millfield and New England Regeneration Partnership (which works closely with Victoria Park Residents Association) and Community First have also raised objection to such relaxation.

Data can never tell the full story as it depends upon what is captured or what can be captured.

Qualitative evidence is crucial in making any decision in such matters and local councillors would be best in place to reflect such community concerns.

Should the Licensing Committee wish to have direct understanding of the residents' concerns, Cohesion Team would be happy to arrange a tour or community based event in Can-Do area.

One key factor which must be borne in mind is the impact of any such relaxation on the limited resources available to tackle social issues including policing, environment and road safety issues.

I am happy to attend Licensing Committee and share my views further.

Kind regards,

Jawaid Khan

The Licensing Team  
Peterborough City Council  
Bayard Place  
Peterborough

21<sup>st</sup> September 2018

Dear Sir/Madam

## **COMMULATIVE IMPACT CONSULTATION**

### **REPRESENTATION FROM MANERP AND COMMUNITY FIRST**

We represent the Millfield & New England Regeneration Partnership (MANERP) and also Community First on licensing matters. MANERP and Community First represents residents and businesses in the Millfield and New England areas of Peterborough.

The Millfield and New England area of Peterborough has had for several years a history of anti-social behaviour fuelled by alcohol and drug abuse. This has been exacerbated by the rapid growth of a number of outlets retailing alcohol by means of “off-sales.”

The area is also within the boundary of the “Can-Do” initiative which has brought together the city council, police, NHS, Resident Associations and other partner agencies to jointly combat the serious issues being faced in this area. The whole area is very sensitive and volatile because of the ease of access to the purchase of alcohol often sold at a low price in order to attract customers or to be competitive.

As the Millfield and New England area has a phenomenal number of outlets selling alcohol “off-sales” which has contributed significantly to anti-social behaviour in the area which impact on all the Licensing Objectives in one way or another. The current joint partnership between Peterborough City Council, Cambridgeshire Police and other partner agencies through the “Can-Do” initiative has highlighted the need to actually reduce the number of outlets and hours that alcohol can be freely purchased, if it is to make any headway towards the goals that it is striving to achieve. If the C.I. Policy is terminated, it is our view that this would have a seriously detrimental impact on everything that has been achieved over the past few years that the policy has been in force in the area.

The area has the highest density in terms of number of alcohol selling outlets in proximity of residential areas in Peterborough and the negative implications of street drinking and consequentially the area was designated a Public Spaces Protection Order.

The extent of frustration of long-time residents in the area is high as they have been deeply affected by alcohol related behaviour including dumped alcohol cans and bottles, people urinating in streets or in resident's front gardens, noise created by shouting and irrational behaviour and more. Children cannot play safely in front

gardens and the level of alcohol related noise impacts on children's sleeping patterns which has an impact on their studies in many cases.

These factors have had its impact resulting in a significant level of 'White flight' from this area as proven by the Census results. The remaining numbers of long term residents are deeply concerned but unable to seek help especially with drastically reduced policing resources. Hence there is very low confidence to report such matters to police, that is if they are able to wait for long time prior to someone answering calls on 101.

All these factors mean that there is a high level of fear of crime in the area and unless people have choice, they would avoid the vicinity of Lincoln Road at late night hour due to rowdy behaviour of drunk people in the street. Many local residents would avoid the area at any time unless they have to come or pass through.

With this and the current Cumulative Impact Policy in mind, we also make this representation under all of the Licensing Objectives set out in the Licensing Act 2003, namely;

- a) The prevention of crime and disorder
- b) Public safety
- c) The prevention of public nuisance
- d) Protection of children from harm

The MANERP's and Community Firsts' primary aim is to try to regenerate an area that has been sadly neglected for many years. The largest single problem of all revolves around the ease, low cost but above all, availability at which alcohol can be purchased and subsequently abused. The impact on the area is huge and is a cause of concern for all the statutory agencies and bodies.

Since its' introduction the Cumulative Impact Policy there has been a small but nonetheless noticeable improvement in the Millfield and New England area. However, if the policy is terminated there is every probability that the problems that were responsible for the C.I. Policy's' introduction in the first will return. This will place a higher burden on the police, the council and the NHS as well as the associated strain that residents and businesses will have to suffer.

We therefore ask that the Cumulative Impact Policy be renewed.

Yours Sincerely

**BRIAN W J GASCOYNE BEM**  
On behalf of the Millfield and New England Regeneration Partnership

**MOHAMMED SAEED**  
On behalf of Community First

To: Licensing Team, Peterborough City Council

**Representation from:** Cate Harding, PCC Community Capacity Manager & Programme Lead for the CAN Do Regeneration Programme

**Re: Cumulative Impact - Policy Consultation**

**Context - Extract from CAN Do Programme Strategy (2011)**

“Peterborough is a city with incredible potential – it has a rich diversity of communities and some fantastic open spaces and public realm. In addition, it has an effective transport network (it is just 50 minutes from the capital), and a rich heritage and history. All of this combines to create the city’s unique identity.

Peterborough also has some incredible partnerships across the public, private and not for profit sectors as well as with many of our communities. There is tangible evidence that these partnerships really do deliver positive results for the city’s communities and local residents.

However much there is to celebrate and build upon, Peterborough is also facing some significant challenges. Community tensions remain high in some parts of the city and health inequalities are higher than the national average with some stark contrasts across city wards. In addition, educational attainment is below average and the overall level of community cohesion, pride and aspiration is lower than desirable.

One of the communities facing most challenge is that based in and around the Gladstone, Millfield and New England community. These three adjacent neighbourhoods span the Central, North and Park Wards and are made up of largely Victorian homes. The area was once regarded as a good place to live and work, where people took pride in their neighbourhood and where neighbours looked out for one another. The area was served by a vibrant high street of local shops, pubs and community venues. Traffic flowed freely and safely alongside pedestrians using the wide pavements. What little open space there was in this predominantly urban area was treasured, valued and looked after by communities that made extensive use of it.

Today, the area paints a very different picture. The population has increased significantly and the area is typically the focal point for many of the city’s new arrival residents who have come to Peterborough from overseas in search of work. Inward migration into the area has been significant over recent years. Alongside this, the population churn has been equally significant and the combination of these two factors has resulted in residential overcrowding and a community that is becoming increasingly fragmented with inherent tensions. The high street, Lincoln Road, is choked with traffic visiting the many retail and other businesses that have grown up over the past few years. Whilst on the face of it this retail and business growth appears positive, the area has become saturated with licensed premises offering access to cheap alcohol. This, in turn, is leading to high levels of alcohol related crime and anti-social behaviour and has a negative impact on health and family life. Alcohol is also a contributory factor to environmental crime such as littering and graffiti. The cumulative effect results in a real feeling from many residents that the area is no longer safe.”

## Background

The above challenges faced by residents across this relatively compact area generated the launch of the **Operation CAN Do Programme** in September 2011, jointly led by Peterborough City Council and Cambs Police.

The programme was designed to be highly ambitious and to take a holistic view of all activities and resources invested by partners across the area. This would provide a framework to ensure services are co-ordinated effectively, and appropriately delivered, to meet the needs of the community.

This multi agency approach launched with partners (primarily Peterborough City Council, Police and Public Health) committing to transform the area over a generation. The programme has a phased 10 year vision to tackle the many challenges faced in the area and bring about transformational change to improve the quality of life, outlook and aspirations of local people.

**Phase 1:** Years 1-2 High vis zero tolerance enforcement and regulation activities

**Phase 2:** Years 3-6 Mainstreaming service provision to tackle root causes of challenges in the area to enable sustainable solutions

**Phase 3:** Years 7-10 Physical Regeneration of public realm, community facilities and public open spaces

To date activity has been focused on enforcement and regulation, bringing the communities and statutory authorities together to tackle 'here and now' issues such as the following priorities identified by the community, which has proved highly successful.

- Heightened community tension
- Crime and Anti Social Behaviour
- Poor quality housing stock & high levels of HMOs
- **Alcohol & Licensing issues**
- Parking
- Growth level of dissatisfaction from communities

Partners and communities lobbied for the introduction of a Cumulative Impact policy which was adopted by full council on 17/4/13. The Cumulative Impact policy was introduced in recognition of the saturation of licensed premises (in particular off-sales) in this area, the consequence of which was having a negative impact on all of the licensing objectives:

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance
- Protection of children from harm

To compliment the monitoring opportunities the policy provided, partners also undertake outreach projects to engage with the general public including people drinking on the streets of the area. Key learning points identified by partners following this activity include:

- drinking in public places is a social norm for many young Eastern Europeans
- mistrust of statutory services among some recent arrivals

- the levels of street alcohol use in Millfield appears to have decreased most likely as a consequence of the PSPO (formerly DPPO)
- displacement of street drinkers from the Op CAN do area to other areas
- Cumulative Impact Policy (CIP) significantly strengthens the ability to limit the number of licensed premises in the neighbourhood.
- national licensing legislation puts enabling economic activity above interests of local communities

### **Current Position**

A SWOT analysis undertaken with local people in phase 2 of the programme highlights that people who live and work in the area wish to turn the weaknesses in the area into strengths by harnessing the power and diversity of the local community. They wish to see new businesses spring into life alongside more established local companies providing new, secure and worthwhile employment. The resultant renewed vibrancy is considered an essential grounding for reducing community tensions and lowering the levels of crime.

It is encouraging to see that locally there is an ever growing network of community groups and social activists who, whilst sometimes cynical, nervous or frustrated by promises in the past that have failed to deliver, continue to be up for the challenge on working together to bring about positive change for the area.

We need to restore and nurture the community's confidence and trust as the area does continue to present a number of complex, multi-layered challenges - the saturation of alcohol off sales remaining one of them. However, there remains the massive potential for these challenges to be converted into innovative, new approaches to delivering a focused, bottom-up portfolio of solutions. The imminent introduction of the Peterborough Integration Strategy, of which the CAN Do Programme is integral, that the Peterborough Together Partnership is developing will bring many new opportunities to achieve this.

Securing £7.5m of capital investment for the area 2017-2020 has enabled the phase 3 objectives for the CAN Do programme to be fulfilled. The community are urging partners to deliver something radically different and impactful for the area. The community wants to celebrate the area's uniqueness and turn the challenges of a diverse community into a significant opportunity to transform it into a destination point where people want to live, work and visit.

### **Concluding statement**

Despite the introduction of the CIP in 2013, alcohol remains very accessible in the CAN Do area. It is accepted that the CIP is limited in its ability to fully tackle the issues presented in the area and it is for this reason that all partners need to remain vigilant to ensure that high standards are maintained by licensees already present in the area.

The current crime statistics show a reduction in alcohol related crime but we are aware via public feedback, community groups and from what is visible on the street, that it is an under-reported issue that continues to affect the quality of life for people living in the area.

But this only emphasises further that we need to embrace every means and tool available to us if we are to have any control or impact in our efforts to bring about the improvements needed and not weaken our ability to do so. It is important that partners not renege on their commitment to see the programme through to its conclusion as it is only with continued shared resources, will and initiatives that a successful outcome can be achieved.

The community-based drive and will to bring about positive change in the area is what made the CAN Do programme become a reality. The foundations are in place to fulfil the original ambition and enable the residents of the CAN-do area to attain a greater quality of life through improved health and well-being, increased economic opportunity and an enhanced physical environment.

For this reason and to retain the trust in the community we urge the the Cumulative Impact policy is continued.