

## Appendix 1

### **Review of the Cumulative Impact Policy 2017-2019**

Section 182 Guidance issued by the Secretary of State defines Cumulative Impact:

13.20 "Cumulative impact" is not mentioned specifically in the 2003 Act. In this Guidance, it means the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area. The cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for a licensing authority to consider in developing its licensing policy statement. Cumulative impact policies (CIP) may relate to premises licensed to carry on any licensable activity, including the sale of alcohol for consumption on or off the premises, and the provision of late night refreshment. This includes late night fast food outlets which are not licensed to sell alcohol.

As you are aware, Eastbourne Borough Council has for a number of years retained a policy that aims to reduce the impact from the proliferation of licensed premises within the Cumulative Impact Zone (CIZ):

I would urge committee to further consider the following points raised by the Secretary of States Guidance:

13.27 In order to identify the areas in which problems are occurring, information about specific incidents can be mapped and, where possible, a time analysis undertaken to identify the key areas and times at which there are specific issues.

13.32 Once adopted, special policies should be reviewed regularly to **assess whether they are needed any longer** or if those which are contained in the statement of licensing policy should be **amended**.

Therefore a **comparative temporal data analysis** should be collated that documents the number, nature and density of licensed premises in the CIZ commencing from before the inception of the policy to date. In conjunction with this, incidents of; crime, noise disturbance and hospital admissions *directly attributed* to licensed premises can be plotted alongside to measure the effect of the policy on reducing such incidents\*.

Subsequently committee will then be better informed as to the impact of the policy on licensed premises and the reduction of incidents. Importantly it will provide evidence whether or not there is indeed a cumulative impact of licensed premises in the area. If the evidence determines that there is *not* a cumulative impact, or that it is only experienced within a *smaller area* of the CIZ, then committee must have regard to the Secretary of States Guidance and amend accordingly to support parliamentary intent.

A study will assist Committee in understanding that if there is *not* a cumulative impact (i.e. the number/nature and effect of licensed premises has declined) then to retain the policy will have a detrimental impact on the growth of new business opportunities within the town. In this regard committee should be mindful of the current Statement of Licensing Policy pp 15 - 19 and especially:

6.3 The Policy supports the Eastbourne Tourism Strategy. It recognises the benefits for the local economy of creating a safe and more attractive town centre. The Licensing Committee may receive any reports relevant to the needs of the local economy for the area in order to ensure that it considers all relevant matters. It may also receive information relating to the employment within the Borough, and the *demand for new investment and employment* where appropriate.

Committee may also be interested in the trends nationally in relation to demographic alcohol consumption and associated retail habits:

<http://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/bulletins/opinionsandlifestylesurveyadultdrinkinghabitsingreatbritain/2014>

- Almost *1 in 5 higher earners* drink alcohol on at least 5 days a week.
- *Young people are less likely* to have consumed alcohol in the last week than those who are older.
- A higher percentage of drinkers in Wales and Scotland drink over the recommended weekly amount in one day.
- Wine is the most popular choice of alcohol.

Drinking habits have changed significantly since the inception of the Cumulative Impact Policy and hence a study of the local nature of licensed premises will assist in determining whether this is also a local trend.

\*In short I would urge committee to commission an in depth study of Eastbourne Boroughs Councils Cumulative Impact policy since inception to determine whether it is still required or requires adaptation.