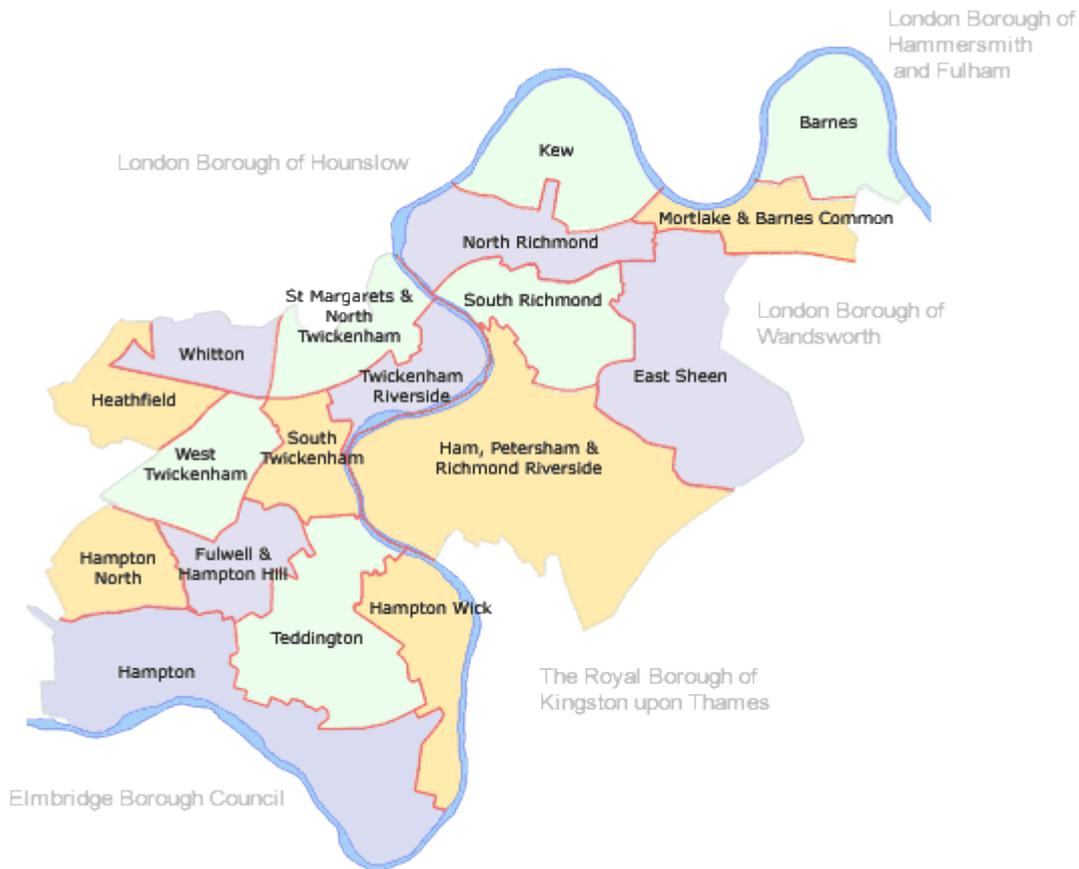


Cumulative Impact Analysis

1. Introduction

- 1.1 Cumulative Impact is defined as the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area. In some areas where the number, type or density of licensed premises is high, or exceptional, serious problems of nuisance, crime or disorder may occur within or some distance away from the area.
- 1.2 A Cumulative Impact Assessment may be published by a Licensing Authority to help it to limit the number or type of 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.
- 1.3 The Policing and Crime Act 2017 (Section 141) sets out what a Licensing Authority must do in order to publish a Cumulative Impact Assessment (CIA). This includes publishing the evidential basis for its opinion and consulting on this evidence. A cumulative Impact Assessment must be published, and consulted upon, every three years. The evidence underpinning the publication of the CIA must be suitable as a basis for a decision to refuse an application or impose conditions.
- 1.4 The evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the particular problems identified in the specific area to be covered by the CIA. The Secretary of State's Guidance provides a list of Information which licensing authorities may be able to draw on when considering whether to publish a CIA including:
- local crime and disorder statistics, including statistics on specific types of crime and crime hotspots;
 - statistics on local anti-social behaviour offences;
 - health-related statistics such as alcohol-related emergency attendances and hospital admissions;
 - environmental health complaints, particularly in relation to litter and noise;
 - complaints recorded by the local authority, which may include complaints raised by local residents or residents' associations;
 - residents' questionnaires;
 - evidence from local and parish councillors;
 - evidence obtained through local consultation;
 - Underage drinking statistics.
- 1.5 This report lays out the evidence that indicates that:
- the Cumulative Impact Policy for Richmond Town Centre should be retained.
 - the Cumulative Impact Policy for Twickenham Town Centre should be retained.
 - no other area of the borough should be included in the Cumulative Impact Assessment at this time.

2. Council Wards

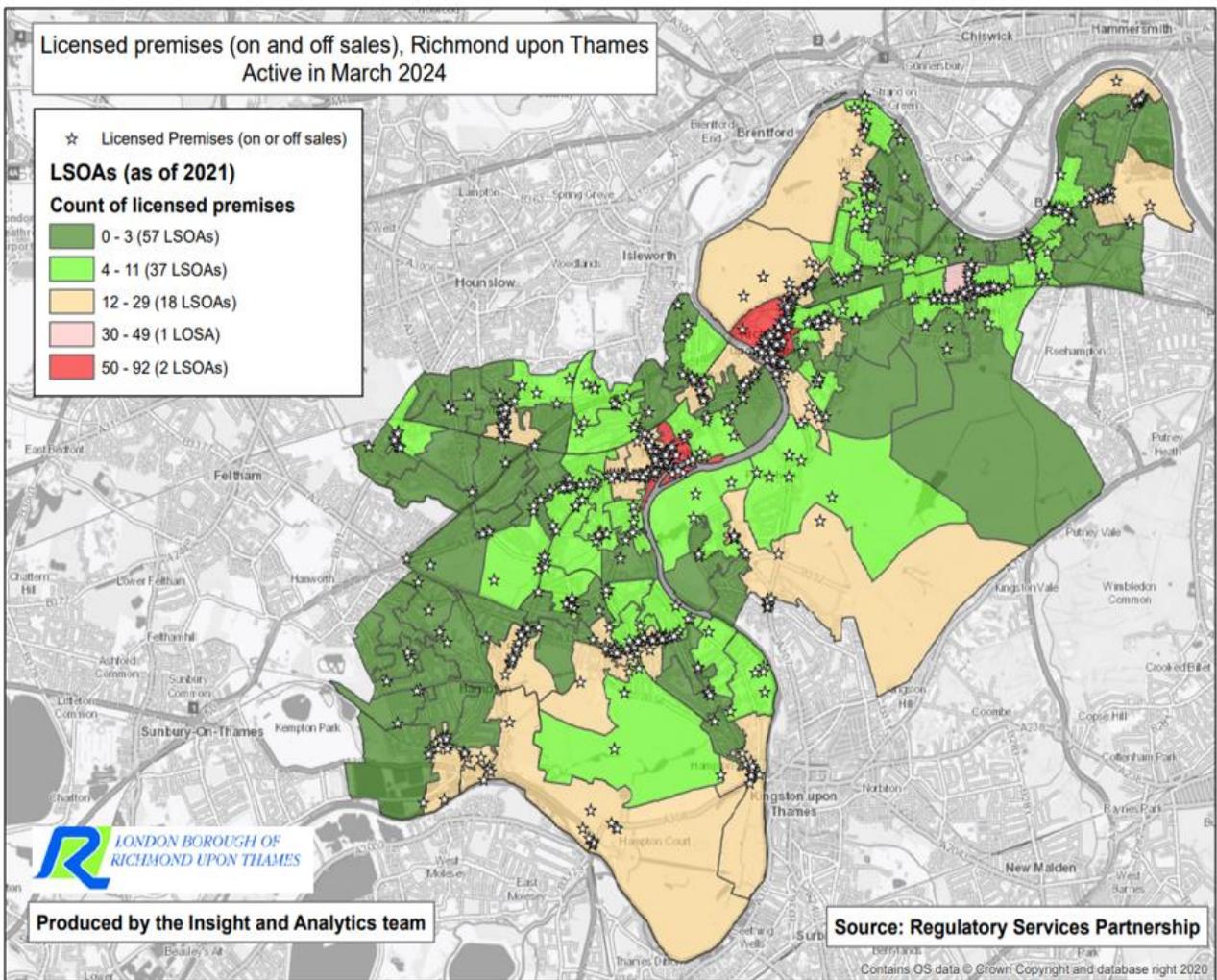


3. Licensed Premises

There are currently some 794 licensed premises in the London Borough of Richmond upon Thames. The borough has five main commercial centres; Richmond, Twickenham, Teddington, East Sheen and Whitton. The busiest of these areas is South Richmond. From the table and map shown below, it can be seen that the highest concentrations of licensed premises lie within Richmond and Twickenham commercial centres. The next most concentrated area is Teddington and East Sheen. It should be noted that not all these premises have licences to sell alcohol, some may be licensed to sell hot food only after 23.00 hours or to provide only public entertainment. A more detailed analysis of the number and type of licensed premises in each of the two existing Cumulative Impact Zones are shown later.

Ward	No. of licensed premises in March 2024
Barnes	41
East Sheen	61
Fulwell & Hampton Hill	36
Ham, Petersham & Richmond Riverside	46
Hampton	37
Hampton North	8
Hampton Wick & South Teddington	29

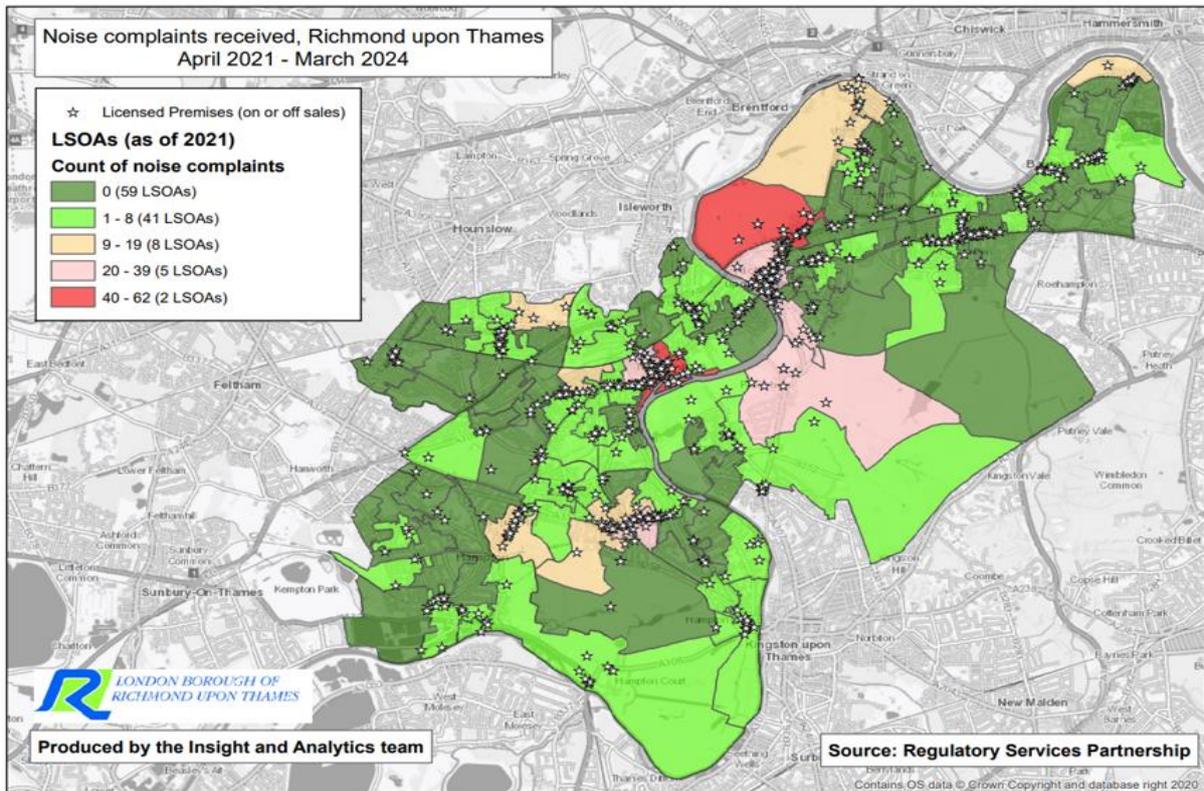
Heathfield	16
Kew	44
Mortlake & Barnes Common	32
North Richmond	36
South Richmond	118
South Twickenham	39
St Margarets & North Twickenham	37
Teddington	62
Twickenham Riverside	98
West Twickenham	25
Whitton	29
Total	794



4. Noise and other complaints relating to licensed premises

Between April 2021 and March 2024 Richmond Council recorded 511 licensing complaints relating to existing licensed premises. The table below shows that Twickenham Riverside and Teddington have the highest number of public nuisance complaints and other complaints relating to licensed premises, followed by North Richmond, Ham, Petersham and Richmond Riverside.

Ward	No. of noise complaints April 2021 – March 2024
Barnes	23
East Sheen	9
Fulwell & Hampton Hill	29
Ham, Petersham & Richmond Riverside	65
Hampton	14
Hampton North	4
Hampton Wick & South Teddington	11
Kew	28
Mortlake & Barnes Common	10
North Richmond	66
South Richmond	32
South Twickenham	25
St Margarets & North Twickenham	21
Teddington	69
Twickenham Riverside	79
West Twickenham	5
Whitton	21



5. Trading Standards – Test Purchases

Between April 2021 and March 2024, London Borough of Richmond upon Thames Trading Standards conducted 63 alcohol test purchases and challenge 25 age policy. Test Purchases (TPs) make up a large proportion of these than Challenge 25 (C25) age policy. Below is the breakdown of the results:

- 2021-22 there were 51 TPs with 10 sales
- 2022-23 there were 10 C25 TPs with 0 sales, and 36 U18 TPs with 3 sales
- 2023-24 there were 2 TPs with 0 sales

All test purchases are carried out in premises selling alcohol for consumption off the premises.

6. Non-Domestic Violence with injury reported to Police

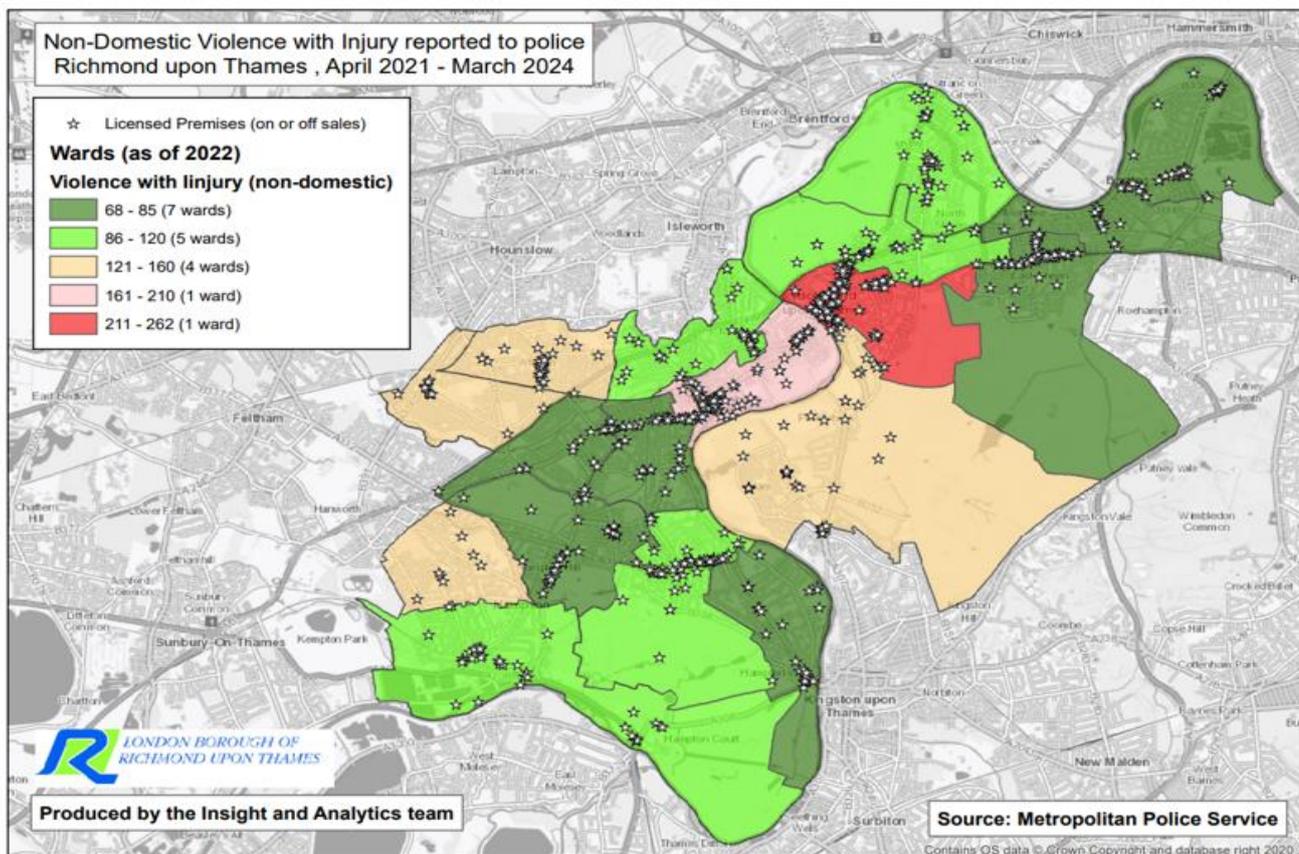
South Richmond has the highest levels of violence with injury (non-domestic) reports, followed by Twickenham Riverside. The table below shows the numbers of violence with injury (non-domestic) and a map of violence with injury (non-domestic) recorded by the Metropolitan Police between April 2021 and March 2024. The map provides a localised picture of police reports on violence (non-domestic) shown at Ward level analysis. The Wards of South Richmond and Twickenham Riverside had the highest number of callouts in 2021-2024. It indicates that the two existing Cumulative Impact Areas of Richmond Town Centre and Twickenham Town Centre lie within areas of the highest police callouts for violence with injury.

Violence with Injury - Non-Domestic

Time Period: April 21 - March 24

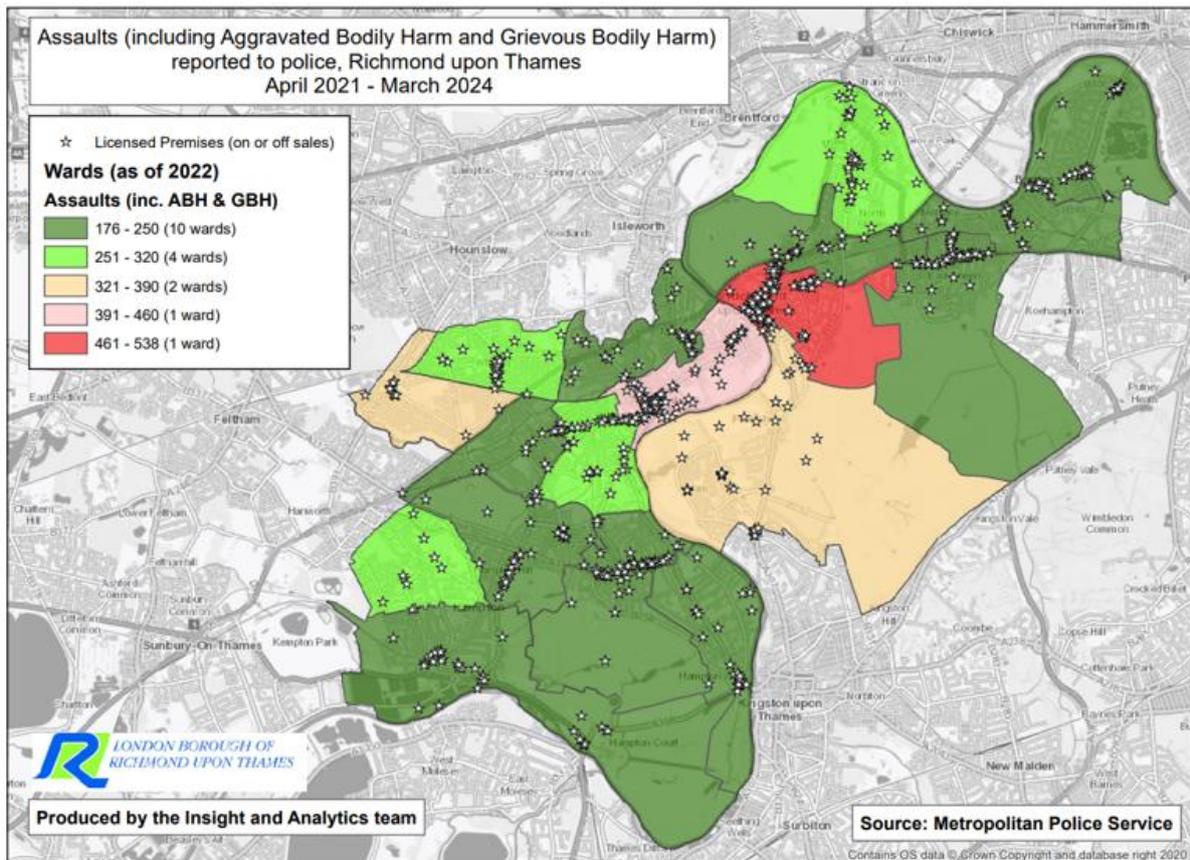
Data Source: Metropolitan Police Service (Ward level data)

Ward	No. of Violence With Injury Non-DA April 2021 – March 2024
Barnes	75
East Sheen	72
Fulwell & Hampton Hill	77
Ham Petersham & Richmond Riverside	126
Hampton	95
Hampton North	124
Hampton Wick & South Teddington	72
Heathfield	121
Kew	89
Mortlake & Barnes Common	83
North Richmond	105
South Richmond	262
South Twickenham	73
St Margarets & North Twickenham	92
Teddington	88
Twickenham Riverside	204
West Twickenham	68
Whitton	121



7. Assaults

The map below shows assaults against the person (Includes Aggravated Bodily Harm and Grievous Bodily Harm) recorded by the Metropolitan Police between April 2021 and March 2024 at Ward level analysis. This covers both domestic and non-domestic offences. The map shows that the highest areas for assaults recorded by the Metropolitan Police are in the two Existing Cumulative Impact Zones of Richmond and Twickenham Town Centres.



The table below shows the actual number of assaults reported to the police at Ward level analysis. The table shows assaults reported to the police from the 1st April 2021 to the 31st March 2024. The Wards of South Richmond and Twickenham Riverside had the highest number of recorded assaults, followed by Heathfield, Ham and Petersham and Richmond Riverside.

Assaults

Time Period: April 2021 - March 2024

Data Source: Metropolitan Police Service (Ward level data)

Ward	No. of Assaults (inc. ABH & GBH) April 2021 – March 2024
Barnes	176
East Sheen	211

Fulwell & Hampton Hill	189
Ham, Petersham & Richmond Riverside	322
Hampton	207
Hampton North	316
Hampton Wick & South Teddington	214
Heathfield	339
Kew	261
Mortlake & Barnes Common	240
North Richmond	244
South Richmond	538
South Twickenham	258
St Margarets & North Twickenham	236
Teddington	216
Twickenham Riverside	396
West Twickenham	231
Whitton	308

8. Anti-social behaviour (ASB) reported to the police

South Richmond and Twickenham Riverside Wards had the highest levels of ASB complaints reported to the police between 1st April 2021 and 31st March 2024. Below is a table and map of ASB complaints recorded by the Metropolitan Police between April 2021 and March 2024 at Ward level analysis. It confirms that the two existing Cumulative Impact Zones of Richmond Town Centre and Twickenham Town Centre lie within the areas of the highest ASB complaints.

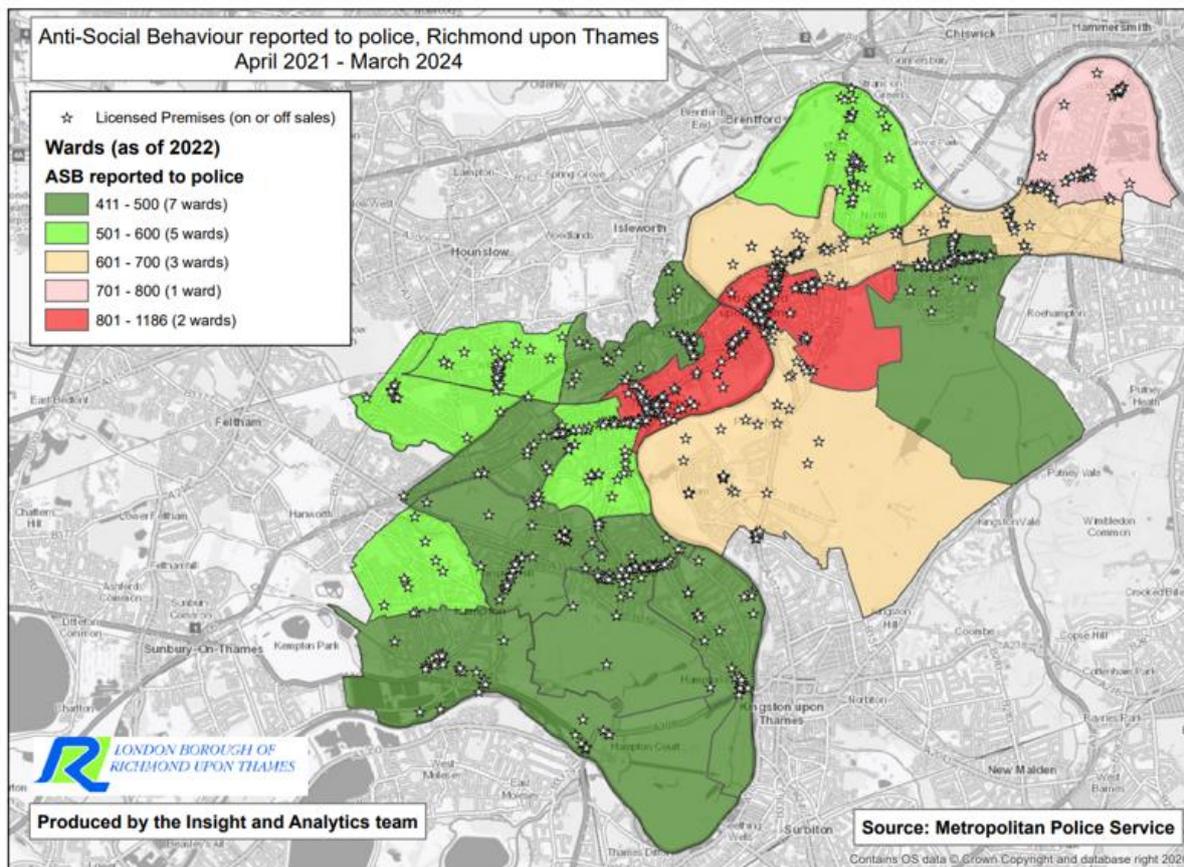
ASB nuisance, rowdy and inconsiderate behaviour

Time Period: April 2021 - March 2024

Data Source: Metropolitan Police Service (Ward level data)

Ward	No. of ASB reported to police April 2021 – Mar 2024
Barnes	710
East Sheen	458
Fulwell & Hampton Hill	470
Ham, Petersham & Richmond Riverside	641
Hampton	482
Hampton North	581
Hampton Wick & South Teddington	435
Heathfield	564
Kew	567
Mortlake & Barnes Common	626
North Richmond	604
South Richmond	1186
South Twickenham	511
St Margarets & North Twickenham	473

Teddington	480
Twickenham Riverside	856
West Twickenham	411
Whitton	505



9. Ambulance call outs

The tables and maps below show that South Richmond, South Twickenham and Twickenham Riverside have the highest ambulance call outs for alcohol, followed by Mortlake and Barnes Common, with Hampton and South Richmond having the highest level of ambulance callouts for assaults.

The table and chart below show that levels of ambulance call outs for alcohol related incidents in Richmond begin to steadily increase from 12noon, peaking between 2-3pm (98 calls), then start to increase between 6pm and 8pm with (135 calls) and peaking at 10pm with 179 calls. Calls start to increase again between 11pm and 12am with 138 calls. Call numbers begin to decrease significantly after 2am.

The levels of ambulance call out for assaults related incidents in Richmond begin to steadily increase from 10am, peaking between 3pm and 4pm(46 calls), then start to increase again between 7pm and 10pm with 83 calls and again from 11pm and peaking at 12am with 100 calls. Call numbers begin to decrease significantly after 2am.

9.1 Ambulance call outs for alcohol

Time Period: April 2021 – December 2023

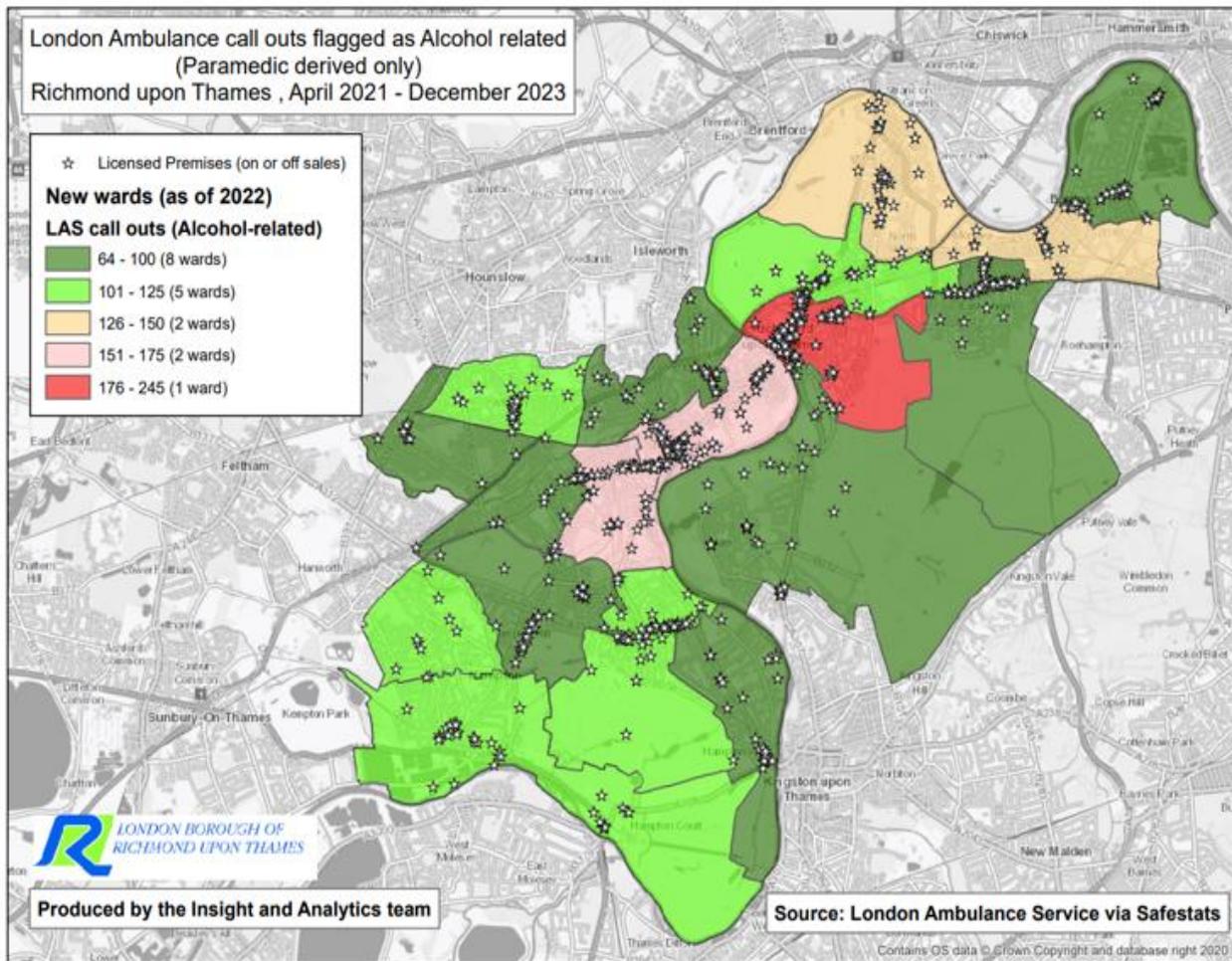
Data Source: London Ambulance Service via SafeStats

(See note below)

Current ward (as of 2022) (based on best fit to 2011 OA)	No. of LAS callouts Alcohol flagged Apr 2021 – Dec 2023
Barnes	67
East Sheen	77
Fulwell & Hampton Hill	64
Ham, Petersham & Richmond Riverside	98
Hampton	112
Hampton North	114
Hampton Wick & South Teddington	68
Heathfield	98
Kew	141
Mortlake & Barnes Common	145
North Richmond	115
South Richmond	245
South Twickenham	163
St Margarets & North Twickenham	94
Teddington	117
Twickenham Riverside	154
West Twickenham	80
Whitton	109

NOTE: Data has been filtered to only include those records in the ‘Alcohol related’ column that say “Paramedic Derived Only”.

LAS data downloaded includes all call outs so there may be multiple call outs to the same incident included. The LAS data available on safestats is still based on the ward structure that was in place before boundary changes took place in May 2022, as such the totals for the current wards have been calculated using a best fit look up of the 2011 Output Areas. London Ambulance service data on Safestats only goes to December 2023 (as of May 2024).

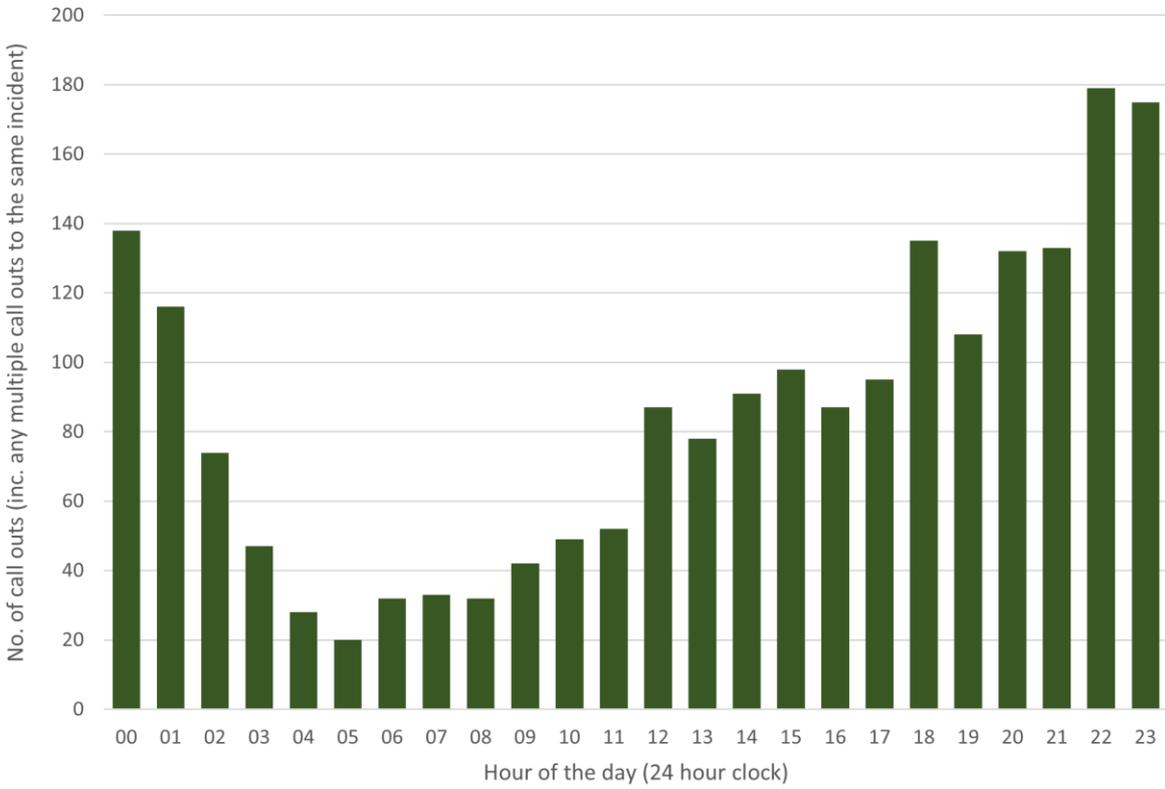


9.2 Alcohol related ambulance call outs in Richmond by hour day

Hour of the day	Alcohol related call outs (paramedic derived only)	Proportion of alcohol flagged calls
00	138	6.7%
01	116	5.6%
02	74	3.6%
03	47	2.3%
04	28	1.4%
05	20	1.0%
06	32	1.6%
07	33	1.6%
08	32	1.6%
09	42	2.0%
10	49	2.4%
11	52	2.5%
12	87	4.2%
13	78	3.8%

14	91	4.4%
15	98	4.8%
16	87	4.2%
17	95	4.6%
18	135	6.6%
19	108	5.2%
20	132	6.4%
21	133	6.5%
22	179	8.7%
23	175	8.5%

Alcohol related call outs in Richmond by hour of the day
 April 21 to December 2023



From 12noon paramedic-derived calls for alcohol-related incidents begin to increase steadily, peaking between 2-3pm (98 calls), between 6pm and 9pm with 135 calls and again between 10pm and 12am with 179 calls.

Call numbers begin to decrease significantly after 2am.

9.3 Ambulance call outs for Assaults

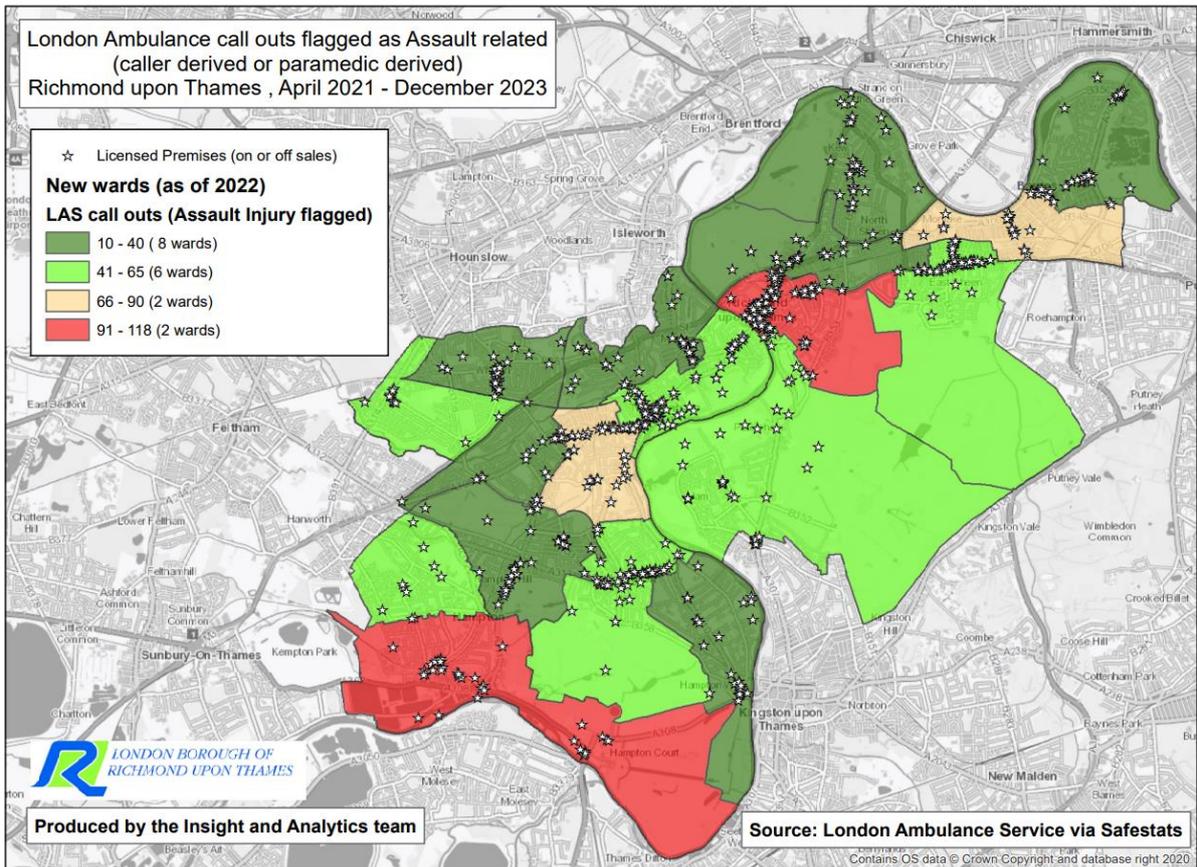
Time Period: April 2021 – December 2023

Data Source: London Ambulance Service via SafeStats

(See note below)

Current ward (as of 2022) (based on best fit to 2011 OA)	No. of LAS callouts Assault-Injury flagged Apr 2021 - Dec 2023
Barnes	10
East Sheen	46
Fulwell & Hampton Hill	35
Ham, Petersham & Richmond Riverside	43
Hampton	118
Hampton North	46
Hampton Wick & South Teddington	34
Heathfield	60
Kew	38
Mortlake & Barnes Common	74
North Richmond	32
South Richmond	97
South Twickenham	82
St Margarets & North Twickenham	35
Teddington	45
Twickenham Riverside	53
West Twickenham	27
Whitton	40

Note: Data has been filtered to include those call outs flagged as “Assault Injury” either caller or paramedic derived. “Assault Injury is a SafeStats-generated category, containing dispatches where callers and/or paramedics have described/recorded patient(s) requiring medical assistance due to the effects of an assault. Entries for this category are therefore shown as 'caller-derived' or 'paramedic-derived' depending on the fields from which the information was retrieved. For more information on the methodology used to create this category, please click [here](#).” LAS data downloaded includes all call outs so there may be multiple call outs to the same incident included. The LAS data available on safestats is still based on the ward structure that was in place before boundary changes took place in May 2022 so the totals for the current wards have been calculated using a best fit look up of the 2011 Output Areas. London Ambulance service data on Safestats only goes to December 2023 (as of May 2024).

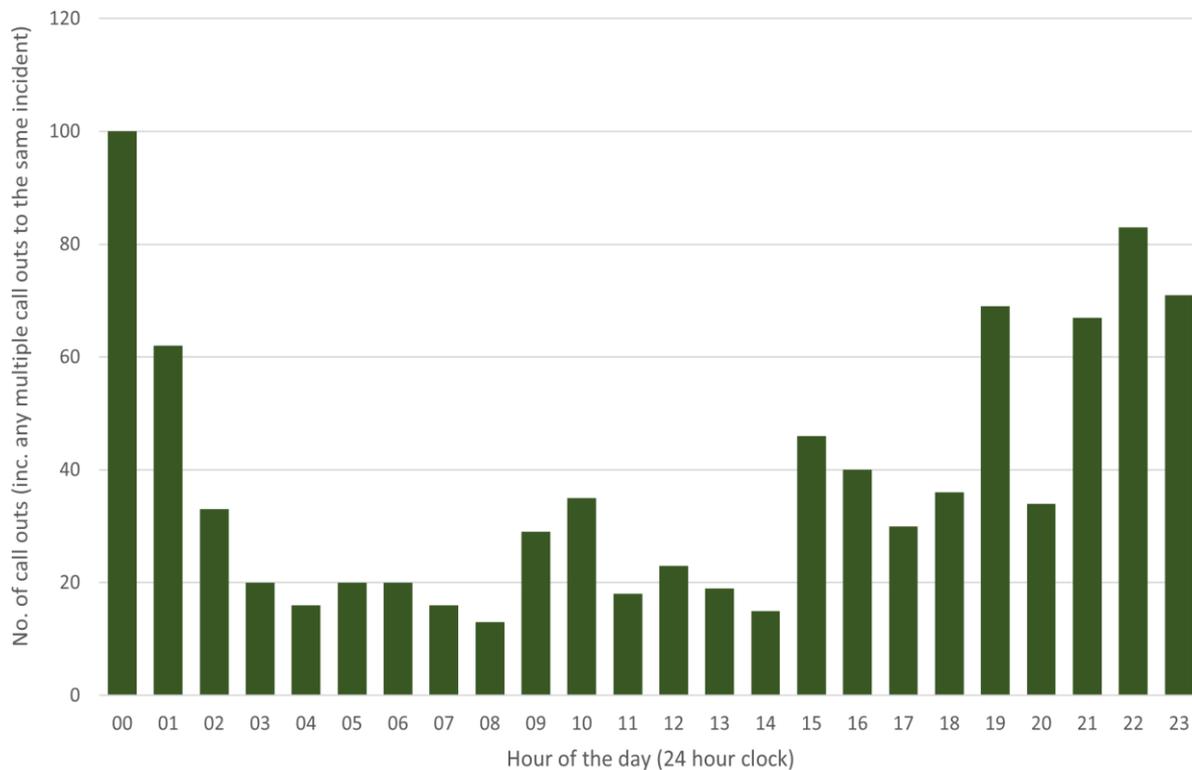


9.4 Assaults related ambulance call outs in Richmond by hour day

Hour of the day	Assault relate call outs (caller and paramedic derived)	Proportion of assault flagged calls
00	100	10.9%
01	62	6.8%
02	33	3.6%
03	20	2.2%
04	16	1.7%
05	20	2.2%
06	20	2.2%
07	16	1.7%
08	13	1.4%
09	29	3.2%
10	35	3.8%
11	18	2.0%
12	23	2.5%
13	19	2.1%
14	15	1.6%
15	46	5.0%
16	40	4.4%
17	30	3.3%

18	36	3.9%
19	69	7.5%
20	34	3.7%
21	67	7.3%
22	83	9.1%
23	71	7.8%

Assault related call outs in Richmond by hour of the day
April 21 to December 2023



From 10a, paramedic-derived calls for assault-related incidents begin to increase steadily, peaking between 3-4pm (46 calls), between 7pm and 10pm with 83 calls and again from 11pm and peaking 12am with 100 calls.

Call numbers begin to decrease significantly after 2am.

9.4 Hospital admissions for alcohol related conditions

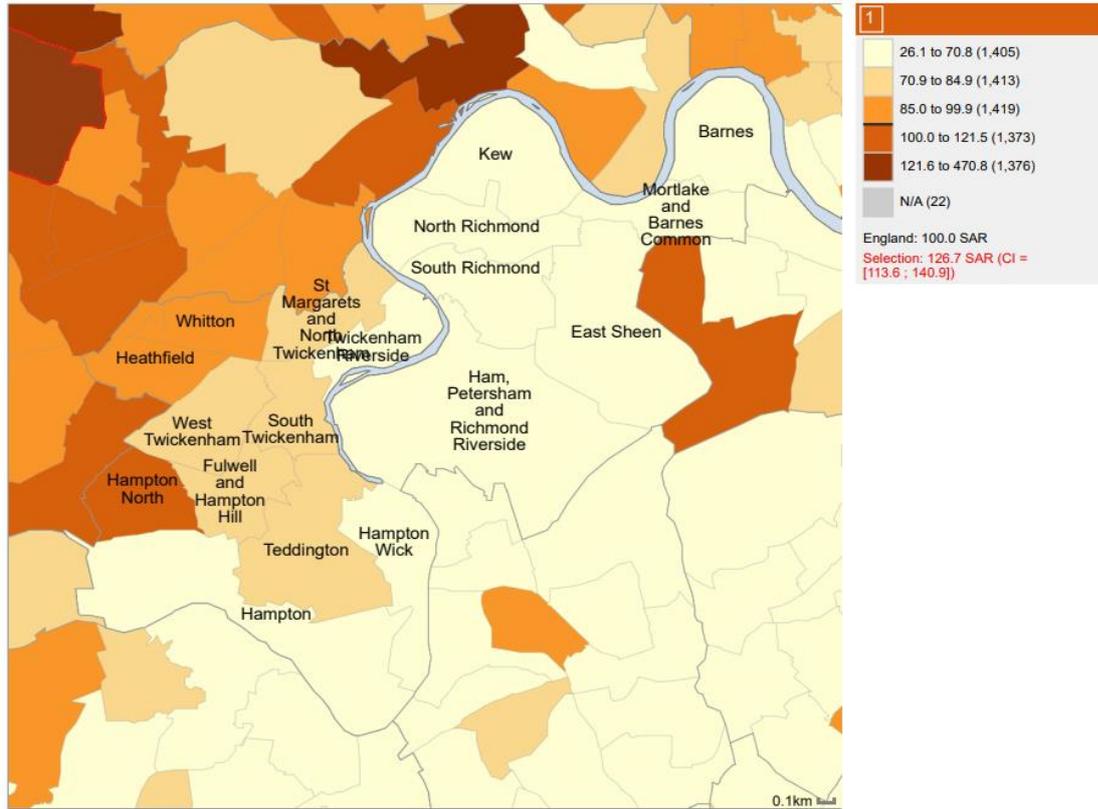
Ward (Pre 2022)	Hospital admissions for alcohol attributable conditions, (Narrow definition)	Hospital admissions for alcohol attributable conditions, (Broad definition)
Barnes	53.1	71.5
East Sheen	43.7	52.3
Fulwell and Hampton Hill	79.1	84.9
Ham, Petersham and Richmond Riverside	60.5	75
Hampton	65.3	77.2
Hampton North	111.9	122.9
Hampton Wick	65.1	78.5
Heathfield	96.9	104.5
Kew	68	71.4
Mortlake and Barnes Common	61	70.9
North Richmond	63.4	81.6
St Margarets and North Twickenham	71.9	80.9
South Richmond	51.8	62.4
South Twickenham	72.3	76.7
Teddington	78	84.3
Twickenham Riverside	68.4	69.2
West Twickenham	81.9	101.2
Whitton	89.5	108.7

Rank of Richmond Wards for alcohol-related hospital admissions, broad and narrow definitions, during the period 16/17 to 20/21

Ward 2021 (Electoral Best Fit)

1 Hospital admissions for alcohol attributable conditions, (Narrow definition), 2016 to 2017 to 2020 to 2021 (SAR)

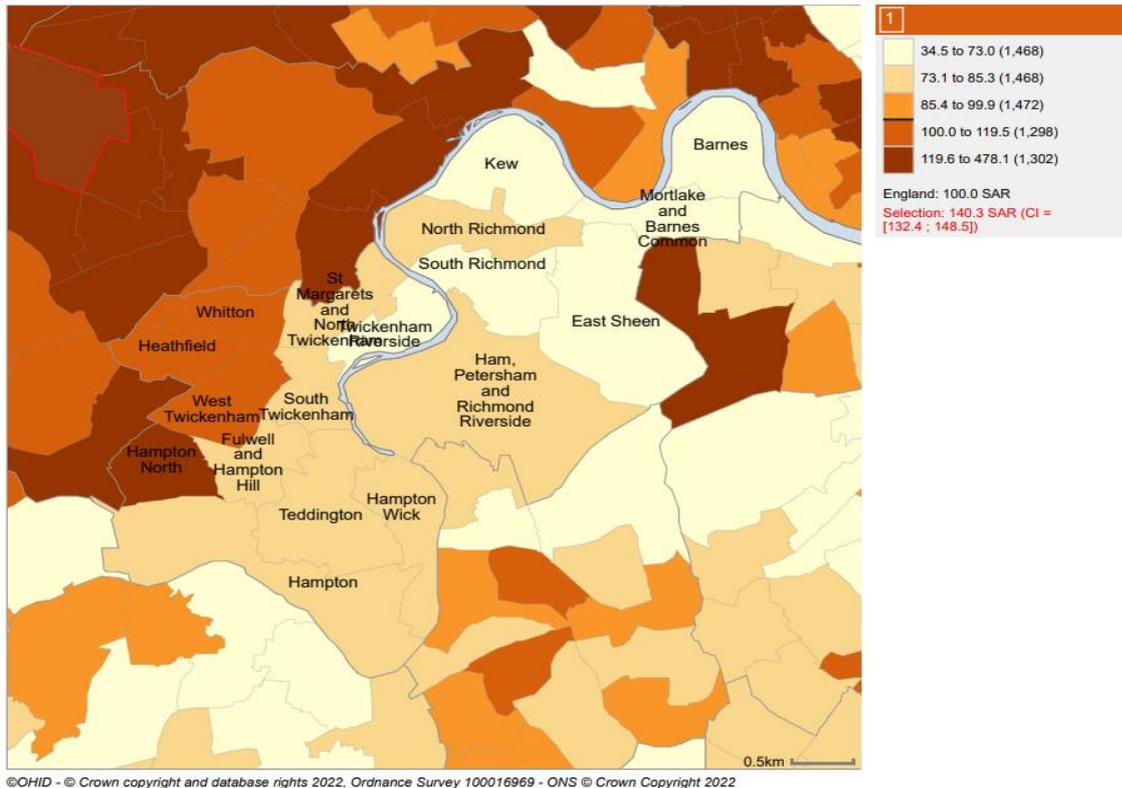
Source: Hospital Episode Statistics (HES) NHS Digital



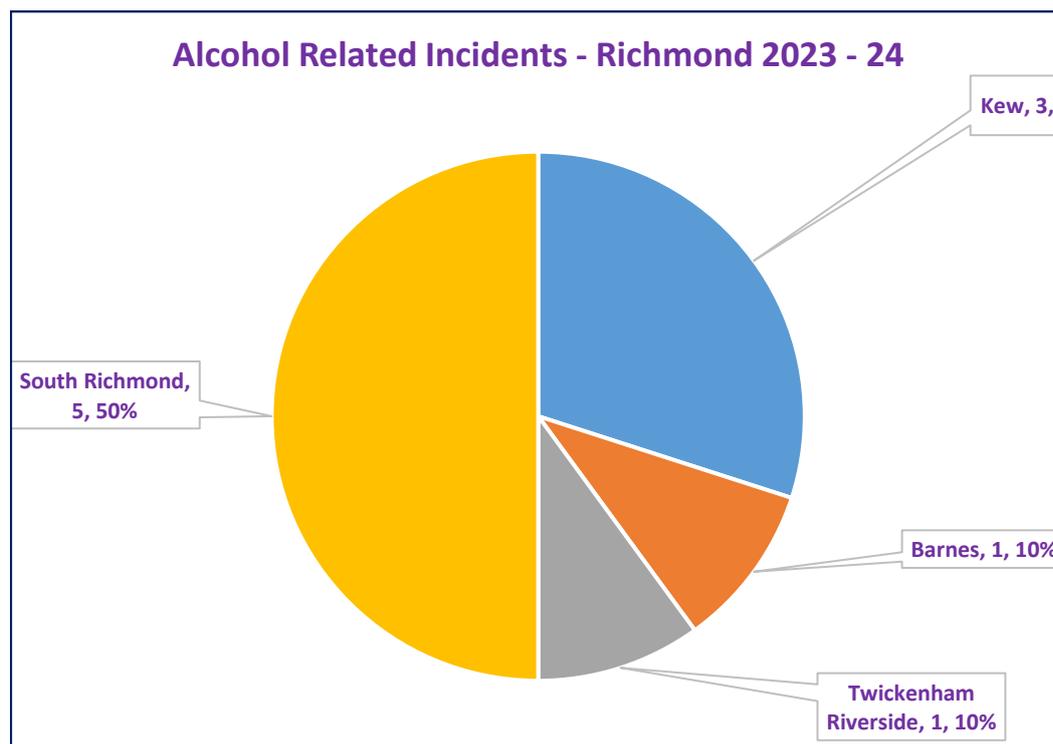
Ward 2021 (Electoral Best Fit)

1 Hospital admissions for alcohol attributable conditions (Broad definition), 2016 to 2017 to 2020 to 2021 (SAR)

Source: Hospital Episode Statistics (HES) NHS Digital



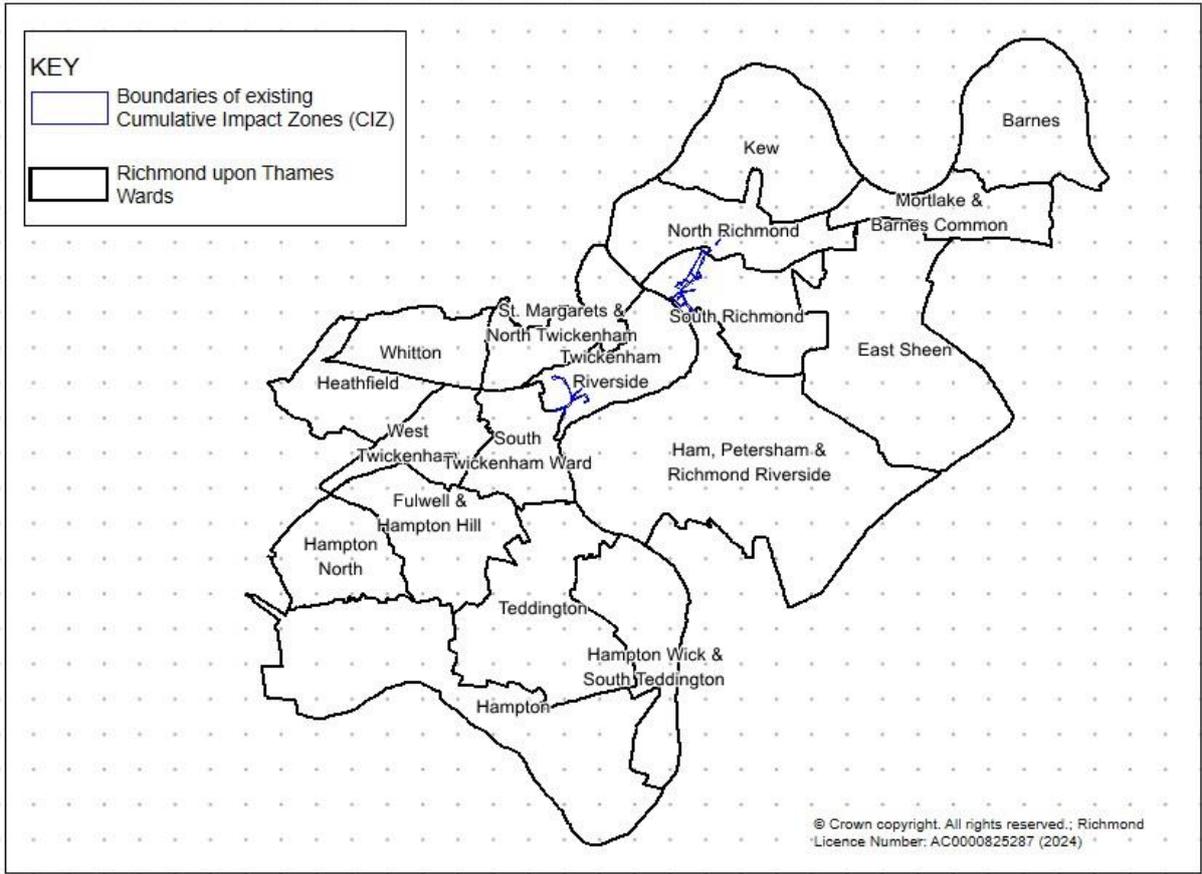
10. Richmond CCTV - Alcohol related incidents April 2023 – March 2024



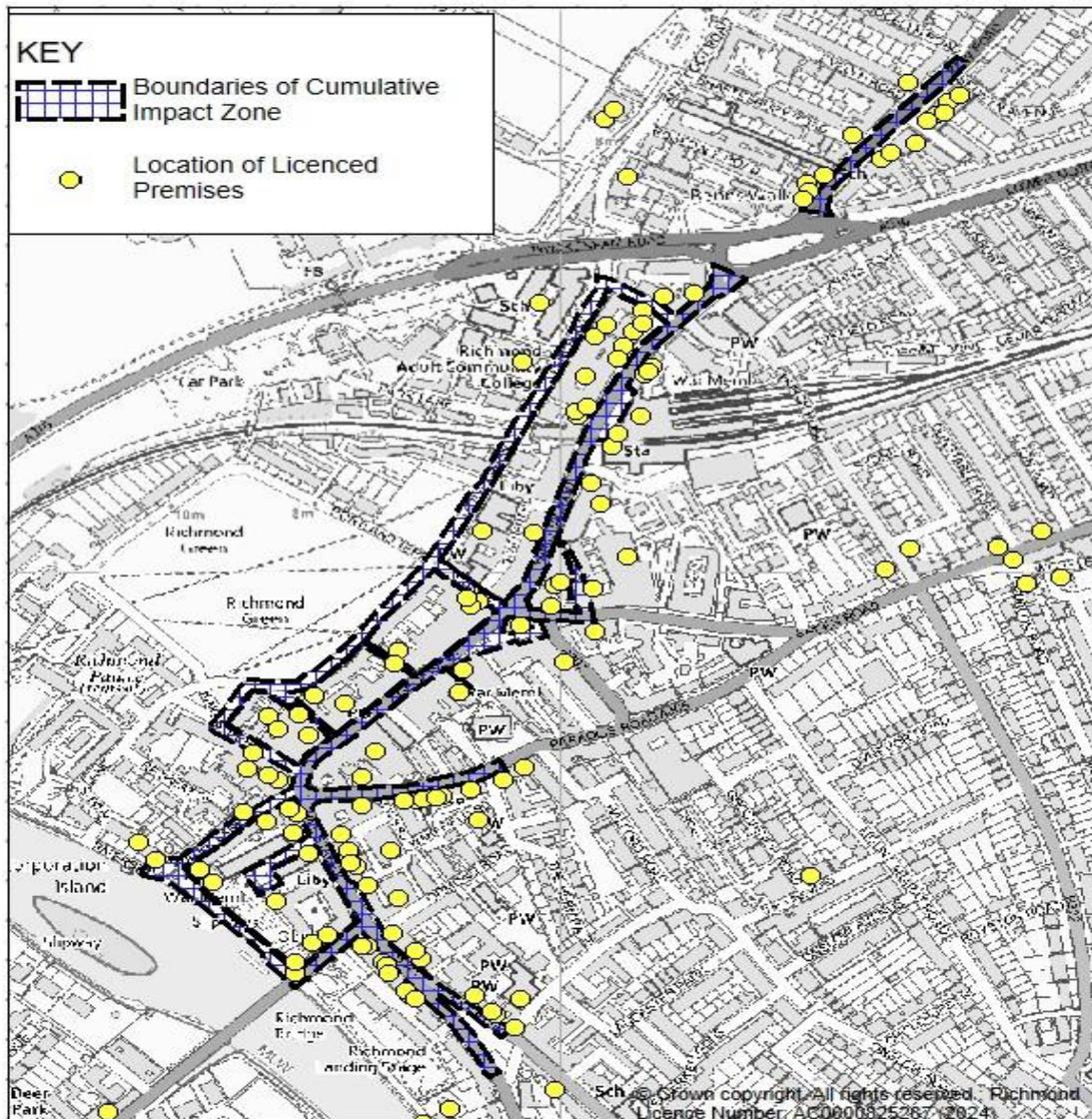
Richmond 2023 - 24	Total
Kew	3
Barnes	1
Twickenham Riverside	1
South Richmond	5
Total	10

11. Current Cumulative Impact Zones

Currently there are 2 Cumulative Impact Zones in the Borough, Richmond Town Centre and Twickenham Town Centre. Both were adopted in 2005 when the Licensing Act 2003 came into force. The areas covered by the current policy are shown in the maps below.



12. Richmond Town Centre existing CIZ



Within the Richmond Town Centre Cumulative Impact Zone 120 premises hold a premises licence or club premises certificate under the Licensing Act 2003.

Active licences within Richmond Town Centre CIZ

Type	Number
Cinema/Theatres	5
Bar/Club/Pub	32
College/University	1
Restaurants	53
Café's/delicatessen	4
Convenience stores/supermarkets/off licence	17
Hotels	1
Hairdressers	1
Community Hall	1
Takeaways/premises selling late night food only (no alcohol)	5

Maximum terminal hour for the sale of alcohol in premises within the Richmond Town Centre CIZ

Total number of premises	Terminal hour before 23.00 hours	Terminal hour up to 23.00 hours	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 01.00 hours	Terminal hour 01.01 hours – 02.00 hours	Beyond 02.00 hours
115	19 (17%)	36 (31%)	43 (37%)	12 (10%)	5 (4%)	0

Maximum Terminal hour for the sale of hot food and drink only

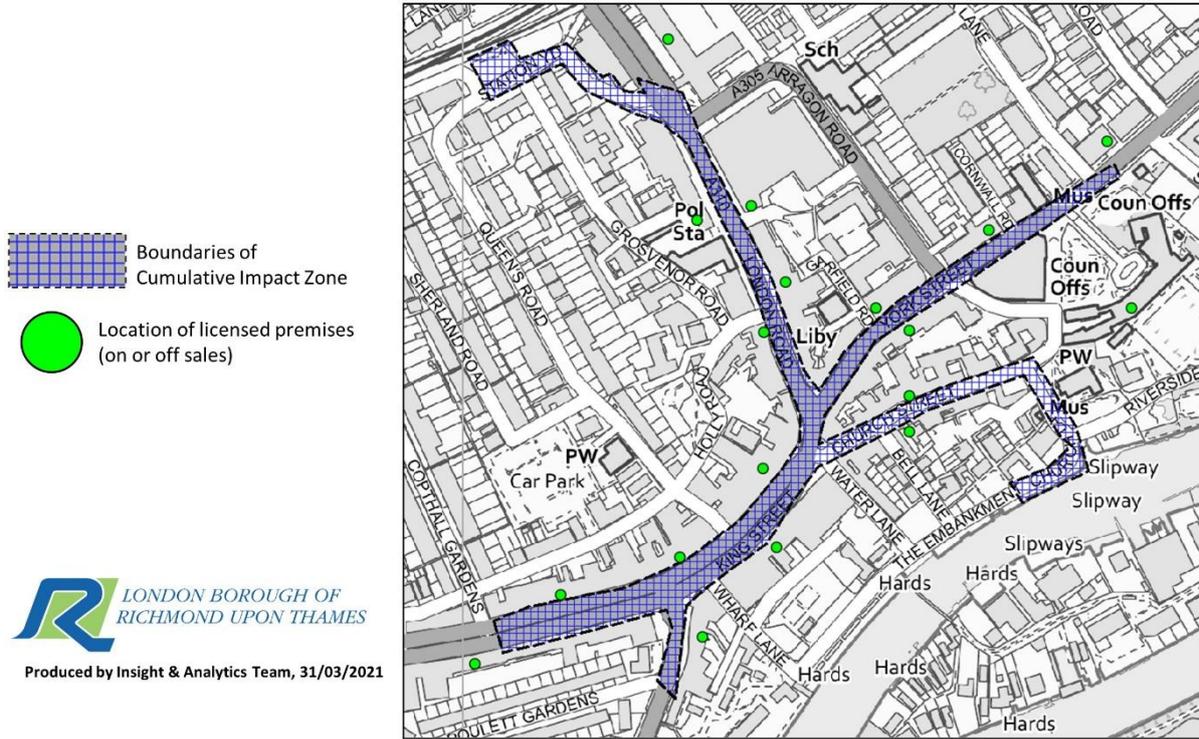
Total number of premises	Terminal hour up to 00.00 (Midnight)	Terminal hour up to 01.00	Terminal hour 01.01-02.00 hours	Terminal hour 02.01 – 03.00 hours
4	1	1	1	1

Richmond Town Centre Cumulative Impact Zone largely falls within South Richmond Ward

This Ward has the highest recorded level of complaints to the police about violence with injury, assaults and anti-social behaviour, the highest number of ambulance call outs for assault (together with Hampton Ward) and the second highest for ambulance call outs for alcohol. Although relatively low in numbers, the area also attracts a number of complaints to the Council’s licensing team. Richmond Town Centre also records the highest incidence of assaults and anti-social behaviour. Richmond Town Centre has the highest density of licensed premises in the borough. Whilst levels of crime and anti-social behaviour across Richmond is low compared to other London boroughs, the high density of licensed premises in Richmond Town Centre is impacting adversely on crime and anti-social behaviour in the area. It is proposed, therefore, that the evidence suggests that Richmond Town Centre retains the special policy with regard to Cumulative Impact as any increase in premises numbers or hours will add to the existing relatively high levels of crime and anti-social behaviour in the area, particularly later into the evening.

In publishing this cumulative impact assessment, the authority is setting down a strong statement of approach to considering applications or the grant or variation of premises licences in the Richmond Town Centre Cumulative Impact Area. The authority considers that the number of premises licences in Richmond Town Centre is such that it is likely that granting further licences would be inconsistent with the authority’s duty to the licensing objectives. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example whilst large nightclubs or late night bars and public houses might add to the problems of cumulative impact, a small restaurant or theatre may not. For this reason, applications with comprehensive operating schedules that meet the following criteria

Cumulative Impact Zone, Twickenham Town Centre



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Active licences within Twickenham Town Centre Cumulative Impact Zone

Type	Number
Pubs/Bars	13
Restaurants	34
Convenience stores/supermarkets/off licence	16
Café's/delicatessens	1
Office	1
Private members club/ sports club	2
Takeaways/premises selling late night food only (no alcohol)	5

Maximum terminal hour for the sale of alcohol in premises within the Twickenham Town Centre CIZ

Total number of premises	Terminal before 23.00	Terminal hour up to 23.00	Terminal hour 23.01 – 00.00 hours	Terminal hour 00.01 – 01.00 hours	Terminal hour 01.01 hours – 02.00 hours	Beyond 02.00 hours
67	10 (15%)	21 (31%)	23 (34%)	10 (15%)	2 (3%)	1 (1%)

Maximum Terminal hour for the sale of hot food and drink only

Total number of premises	Terminal hour up to Midnight	Terminal hour 01.01-02.00 hours	Terminal hour 02.01 – 03.00 hours
5	1	2	2

The Twickenham Town Centre CIZ lies within Twickenham Riverside Ward. Plans to redevelop Twickenham Riverside are well advanced with provision for new open spaces, restaurants, housing and offices opening up to the River Thames. This redevelopment is designed to be family friendly and it is anticipated that it will be an attraction for visitors, thus changing the dynamic of the area.

This Ward currently has the second highest level of complaints to the police about violence with injury (non-domestic) and assaults. The Ward also records high levels of anti-social behaviour and ambulance call outs. Twickenham Town Centre also records the second highest rates of violence with injury (non-domestic), assaults and anti-social behaviour. Twickenham Town Centre has the second highest density of licenced premises in the borough. The high density of licensed premises in Twickenham Town Centre is impacting adversely on crime and anti-social behaviour in the area.

It is proposed, therefore, that the evidence suggests that Twickenham Town Centre retains the special policy with regard to Cumulative Impact as any increase in premises numbers or hours will add to the existing relatively high levels of crime and anti-social behaviour in the area, particularly later into the evening.

In publishing this cumulative impact assessment, the authority is setting down a strong statement of approach to considering applications or the grant or variation of premises licences in the Twickenham Town Centre Cumulative Impact Area. The authority considers that the number of premises licences in Twickenham Town Centre is such that it is likely that granting further licences would be inconsistent with the authority's duty to the licensing objectives.

However, as with Richmond Town Centre CIA, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

Premises that are not alcohol led and

- i. support the people visiting the area during the day;
- ii. support the ethos of a family friendly area; and/or i
- iii. support the wider cultural offering in the area

14. Inclusion of new areas in the Cumulative Impact Assessment.

There is no other area of the borough where there is any clear link between a high density of licensed premises and high levels of crime and disorder, anti-social behaviour and ambulance call outs.