

## Cumulative Impact Assessment

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.
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.
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 CIA 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.
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.

### The steps taken to develop the Special Policy on Cumulative Impact

5. At its meeting on [25th October 2023](#), the Licensing Committee agreed that a Cumulative Impact Assessment (CIA) should be carried out for Wandsworth Borough. This agreement was reflected in the revised Statement of Licensing Policy (Paragraph 10.1), which was approved by the Committee and adopted by Full Council on 22<sup>nd</sup> May 2024.

6. On 16<sup>th</sup> July 2024, the Licensing Committee approved the data streams to be explored to establish a robust evidence base for adoption of a Cumulative Impact Policy (CIP) for the Borough. The Licensing Committee also approved a list of exceptions to the CIP taking into consideration the Nighttime Strategy for Wandsworth. A copy of the information considered by this Committee is available in the report of the Licensing Committee of the 16<sup>th</sup> of July 2024, available on request or on the Council's website [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk).
7. On 23<sup>rd</sup> October 2024, the Licensing Committee received a verbal update on preliminary data and progress made towards the CIA for the London Borough of Wandsworth.
8. Granular data analysis for the CIA was fully completed and presented to the Licensing Committee on 29<sup>th</sup> January 2025. The data compiled for the full CIA research report plotted the density of licensed premises in the Borough against police, ASB, ambulance and noise data which was obtained between April 2023 and March 2024. Additional data collected included number of Fixed Penalty Notices issued, street drinking hot spot areas within the Borough, surveys from key stakeholders and fieldwork research, which included observations of cumulative impact in the key areas of interests in the Borough. The committee considered the CIA evidence and were of the view that there was sufficient evidence available to support introducing a CIP in Tooting Broadway and Clapham Junction, for the 'off' sales of alcohol only ('Off' licence) and Putney High Street for premises predominately providing late night refreshments (LNRs) only (The sale of hot food and drinks only between 23:00 hours and 05:00 hours). A full consultation to the proposed CIA was then carried out with residents and businesses in the Borough and their representatives, as well as with the responsible authorities under the Licensing Act 2003. A copy of the evidence considered by the Committee is available in the report of the Licensing Committee of the 29<sup>th</sup> January 2025, available on request or on the Council's website [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk).
9. A further meeting of the Licensing Committee was held on the 8<sup>th</sup> July 2025, when the results of the consultation were fully considered and the areas where a special policy on Cumulative Impact will apply were agreed. A copy of the evidence considered by this Committee and minutes of the discussion are available on request or on the Council's website [www.wandsworth.gov.uk](http://www.wandsworth.gov.uk).
10. The Council's Statement of Licensing Policy will incorporate the newly approved Special Policy on Cumulative Impact at the next review of the Licensing Policy.
11. **Cumulative Impact Assessments (CIA) and Cumulative Impact Policy (CIP)**
  - 11.1.1 Having regard to the Cumulative Impact Assessment, a Special Policy on Cumulative Impact will apply to the areas as listed in the following sections. The separate areas where Cumulative Impact Assessments have been published are referred to as Cumulative Impact Zones (CIZ).
  - 11.2 The Cumulative Impact Policy, in conjunction with the Cumulative Impact Assessment has the following effect:

- a) The CIP creates an evidential presumption: namely. that it is likely that applications for the grant of any further relevant authorisations in the areas identified in the CIA would negatively impact on the licensing objectives.
- b) It is for an applicant to rebut that presumption.
- c) Those making representations against an application for a further relevant authorisation in respect of premises located in an area the subject of a CIP are not required to adduce evidence that there would be negative cumulative impact if the application were granted. The policy presumption applies whether or not they adduce evidence.
- d) The likely negative impact presumed by the Policy is not limited to an impact on the immediate vicinity of the premises the subject of an application but extends to the whole of the CIA areas.

### **Cumulative Impact Assessments (CIA)**

12. A Special Policy on Cumulative Impact will apply to the following areas:

#### **13. Tooting Broadway Cumulative Impact Zone**

13.1 The area included in Tooting Broadway Cumulative Impact Zone (CIZ) is shown in Figure 1(a) below and Figure 1(b) shows the roads/streets located in the CIZ.

13.2 The special policy for Tooting Broadway relates to the sale of alcohol for consumption 'off' the premises only ('Off' licence). This applies to all applications for new off licence or variation applications that increase the hours or capacity of the premises.

13.3 Tooting Broadway is a vibrant area with a diverse offering of restaurants, cafes, bars and 'off' licences. At its heart lies Tooting and Broadway markets, which are lively hubs with a diverse offering of a range of food stalls, entertainment, independent shops, cafes, restaurants and boutiques, reflecting the area's multicultural community. Tooting Broadway has been identified as having a high concentration of licensed premises in the ward.

13.4 The Cumulative Impact Assessment report identified that Tooting Broadway faces acute challenges with alcohol-related violence, theft, antisocial behaviour (ASB) and public nuisance during late-night hours, exacerbated by a concentration of off-licences and late-night refreshment premises. Street drinking hotspots were identified in Tooting Broadway, concentrated near off-licensed premises. These hotspots were linked to visible litter, rough sleeping and associated ASB. The area records high levels of crime, anti-social behaviour and ambulance call outs. The Metropolitan Police, Public Health and community safety stakeholders highlighted Tooting Broadway as the most resource-intensive area.

13.5 In view of the problems identified with street drinking around Tooting Broadway hotspot areas and having regard to the data on levels of crime, anti-social behaviour, ambulance call outs and hospital admissions for alcohol related conditions, the Authority approved the special policy on cumulative impact in

Tooting Broadway areas of interest, which relates to applications for off-sales of alcohol.

13.6 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 “off-sales” premises licences in Tooting Broadway CIA. The authority considers that the number of “off-sales” premises licences in Tooting Broadway CIA is such that it’s likely that granting further licences would be inconsistent with the authority’s duty to promote licensing objectives. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, alcohol ancillary to the main business activity e.g. florist providing champagne with flowers or cheese shop selling wine to accompany cheese. For this reason, applications for “off sales” of alcohol 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:

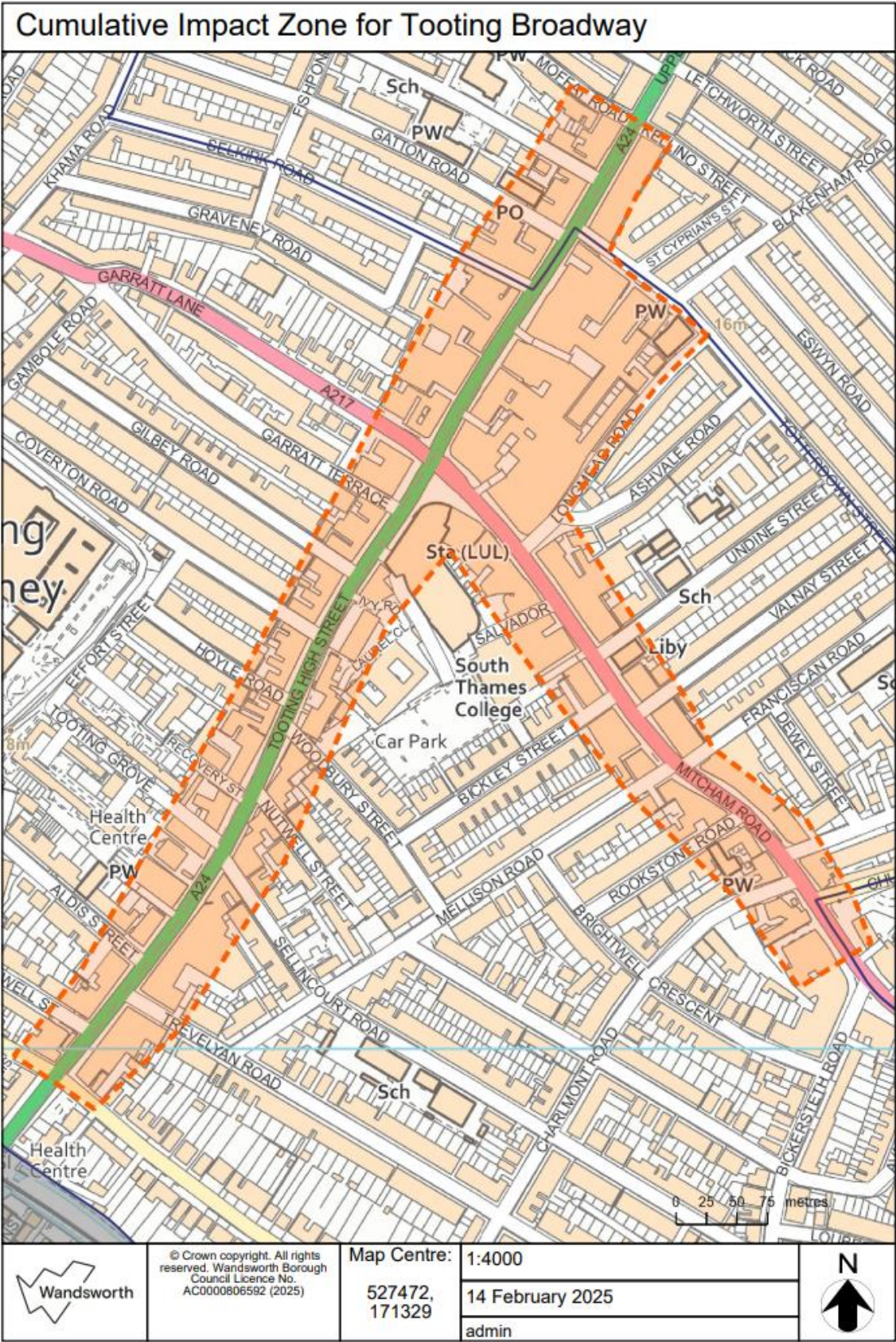
### 13.7 Exceptions to Tooting Broadway CIZ

- a) Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
  - i. Specialist premises selling alcohol ancillary to main activity of business e.g. florist providing champagne with flowers, cheese shop selling wine to accompany cheese.
  - ii. Conditions that no beer, lager, cider, ale or spirit mixers with an Alcohol By Volume (ABV) content of above 5.5% will be sold or offered for sale.
  - iii. Instances where the applicant is applying for a new licence on substantially similar terms to a licence, they have recently surrendered for a premises of comparable size in the cumulative impact policy area.

13.8 Examples of factors that will not be considered as exceptional for ‘off’ licence applications include but are not limited to:

- a) that the premises will be well managed and run.
- b) that the premises will be constructed to a high standard.
- c) that the applicant operates similar premises elsewhere without complaint.

### Fig 1 (a). Tooting Broadway Cumulative Impact Zone



**Fig 1(b). Tooting Broadway Cumulative Impact Zone**

| ROAD NAME           |
|---------------------|
| Aldis Street        |
| Ashvale Road        |
| Bickley Street      |
| Blackshaw Road      |
| Broadwater Road     |
| Carlwell Street     |
| Charlmont Road      |
| Church Lane         |
| Coverton Road       |
| Franciscan Road     |
| Garratt Lane        |
| Garratt Terrace     |
| Gatton Road         |
| Gilbey Road         |
| Hoyle Road          |
| Kellino Street      |
| Longley Road        |
| Longmead Road       |
| Mellison Road       |
| Mitcham Road        |
| Moffat Road         |
| Nuttwell Street     |
| Recovery Street     |
| Rookstone Road      |
| Salvador            |
| Selkirk Road        |
| Sellincourt Road    |
| Tooting Grove       |
| Tooting High Street |
| Totterdown Street   |
| Trevelyan Road      |
| Undine Street       |
| Valnay Street       |
| Woodbury Street     |

#### 14. Clapham Junction Cumulative Impact Zone

14.1 The area included in the Clapham Junction CIZ is shown in Figures 2(a) below and Figure 2(b) shows the roads/streets located in the CIZ.

14.2 The special policy for Clapham Junction relates to the sale of alcohol for consumption 'off' the premises only ('Off' licence). This applies to all applications for new off licence or variation applications that increase the hours or capacity of the premises.

14.3 Clapham Junction Town Centre falls within Falconbrook Ward. It is a vibrant and popular area that offers a unique blend of shopping, dining, and a diverse entertainment. It is one of the busiest town centres in Wandsworth. It is

commonly known as one of south west London's shopping and entertainment destinations.

14.4 Clapham Junction is also best known for its busy railway station near St John's Hill in the south-west of Battersea in Wandsworth. It is not in Clapham; the area around the station is commonly identified as Clapham Junction. Many rail routes from London's two busiest termini, Waterloo and Victoria, funnel through the station making it one of the busiest in Europe by number of trains using it, more than one hundred an hour outside peak periods. Each day, thousands of people pass through the railway station and people from across the Borough and beyond come to live, work, visit and shop in there. Clapham Junction has been identified as having a high concentration of licensed premises in the Borough.

14.5 The Cumulative Impact Assessment identified that Clapham Junction register high levels of crime and disorder, ASB, noise, littering (empty bottles and cans) and was ranked top 3 for ambulance call outs. The CIA identified Clapham Junction as a key location for street drinking by those with street-based lifestyles (who will mostly have acquired alcohol from local off-licences). The hotspots areas identified were linked to visible litter, rough sleeping and associated ASB. The police, public health and community safety stakeholders highlighted Clapham Junction as one of the most resource-intensive area in the Borough.

14.6 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 "off-sales" premises licences in Clapham Junction CIA. The authority considers that the number of "off-sales" premises licences in Clapham Junction CIA is such that it's likely that granting further licences would be inconsistent with the authority's duty to promote licensing objectives. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example, alcohol ancillary to the main business activity e.g. florist providing champagne with flowers or cheese shop selling wine to accompany cheese. For this reason, applications for "off sales" of alcohol 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:

#### 14.7 **Exceptions to Clapham Junction CIZ**

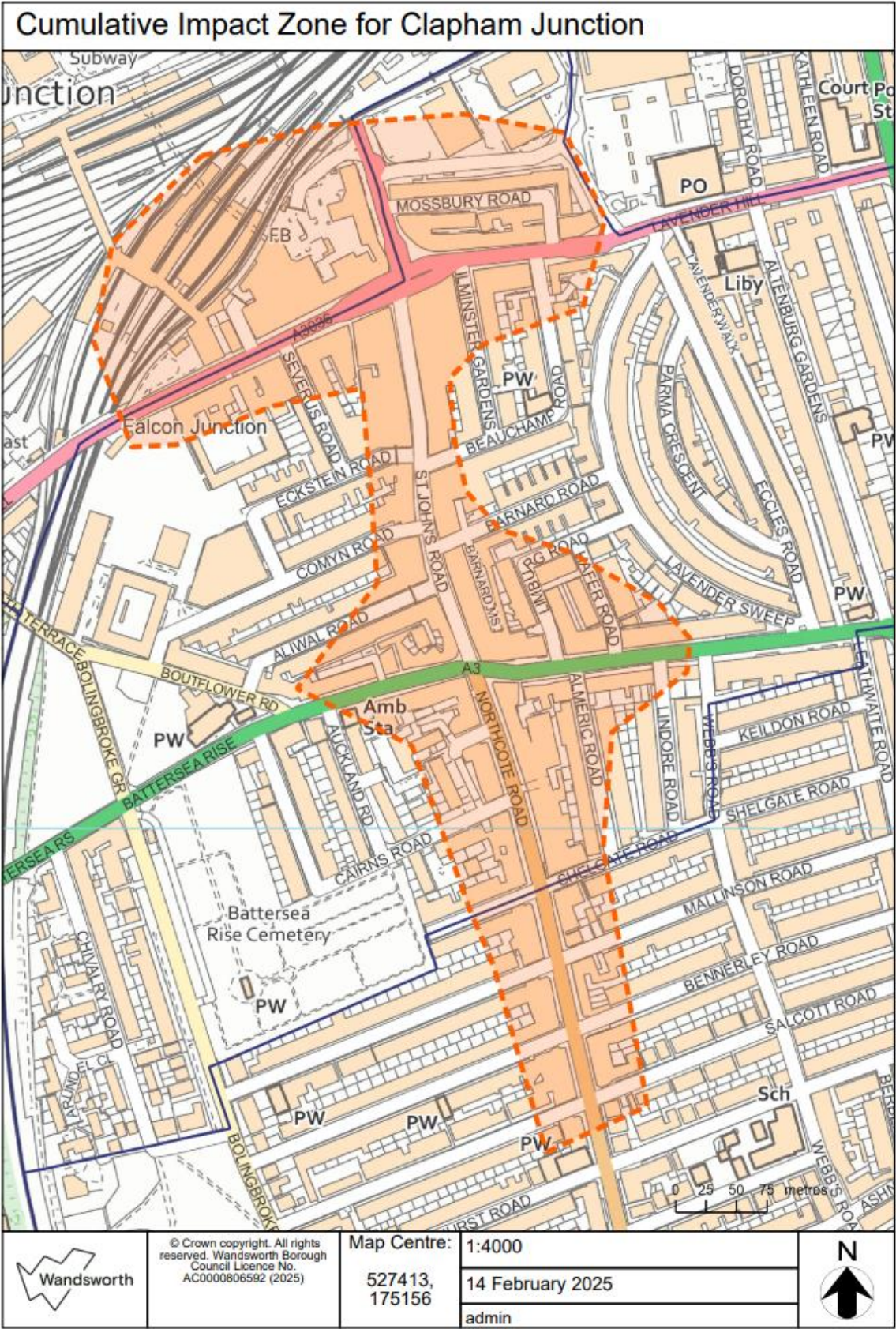
- a) Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:
  - i. Specialist premises selling alcohol ancillary to main activity of business e.g. florist providing champagne with flowers, cheese shop selling wine to accompany cheese.
  - ii. Conditions that no beer, lager, cider, ale or spirit mixers with an Alcohol By Volume (ABV) content of above 5.5% will be sold or offered for sale.

- iii. Instances where the applicant is applying for a new licence on substantially similar terms to a licence, they have recently surrendered for a premises of comparable size in the cumulative impact policy area.

14.8 Examples of factors that will not be considered as exceptional for 'off' licence applications include but are not limited to:

- a) that the premises will be well managed and run.
- b) that the premises will be constructed to a high standard.
- c) that the applicant operates similar premises elsewhere without complaint.

**Fig 2(a). Clapham Junction CIZ**



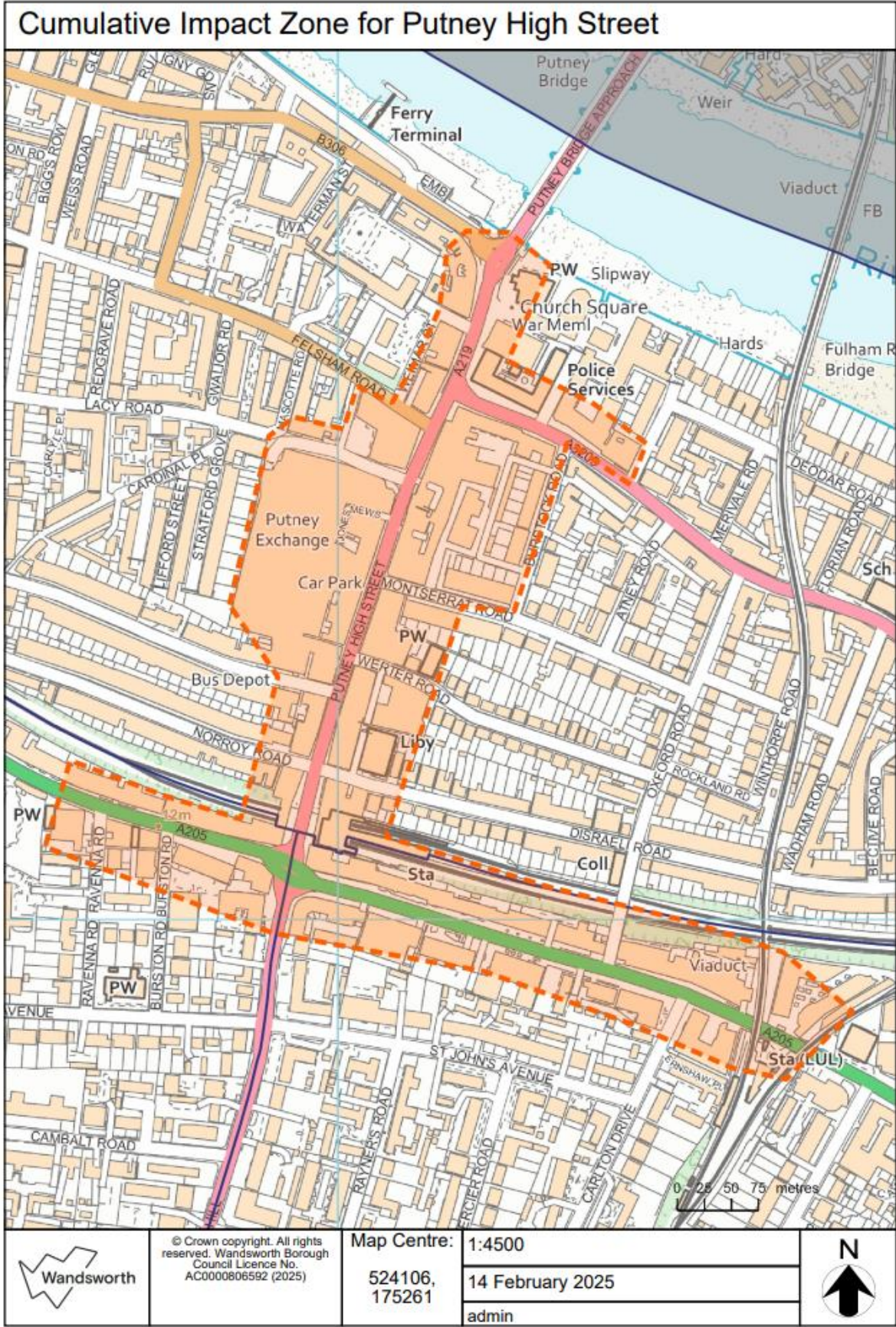
**Fig 2(b). Clapham Junction CIZ**

| ROAD NAME         |
|-------------------|
| Abyssinia Road    |
| Aliwal Road       |
| Almeric Road      |
| Barnard Road      |
| Beauchamp Road    |
| Bennerley Road    |
| Cairns Road       |
| Comyn Road        |
| Eckstein Road     |
| Falcon Lane       |
| Falcon Road       |
| Hafer Road        |
| Ilminster Gardens |
| Junction Approach |
| Lavender Hill     |
| Limburg Road      |
| Lindore Road      |
| Mallinson Road    |
| Mossbury Road     |
| Northcote Road    |
| Prested Road      |
| Salcott Road      |
| Severus Road      |
| Shelgate Road     |
| St Johns Hill     |
| St Johns Road     |

## 15. Putney High Street Cumulative Impact Zone

- 15.1 The area included for Putney High Street CIZ is shown in Figure 3(a) below and Figure 3(b) shows the roads/streets located in the CIZ.
- 15.2 The special policy for Putney High Street relates to premises providing Late Night Refreshments only (The sale of hot food and drinks between 23:00 hours and 05:00 am). This applies to all applications for new or variations of premises licences that increase the hours or capacity.
- 15.3 Putney High Street is in Putney Ward. The High Street is well known for its vibrant lively atmosphere, diverse shopping options, bars, restaurants, cinemas, takeaways, and markets.
- 15.4 The Cumulative Impact Assessment identified that Putney High Street register a high volume of alcohol related ambulance callouts and reported concerns on assaults, noise, littering and vandalism. Putney ward councillors also reported concerns about assault, noise, intoxication and vandalism, particularly after venues close. There were concerns around overcrowding, unpredictable behaviour, noise, litter and road safety. The CIA identified that the number of late-night food venues on Putney High Street was of a particular concern.
- 15.5 The Authority recognises that it must balance the needs of business operators with those of local residents. However, currently the number and type of premises are impacting negatively on the licensing objectives. In adopting the special policy, the authority is setting down a strong statement of approach to considering applications for the grant or variation of premises licences providing Late Night Refreshments only, on Putney High Street CIZ. The authority considers that the number of licensed premises providing Late Night Refreshments only on Putney High Street Cumulative Impact Area is such that is likely that granting further licences would be inconsistent with the authority's duty to promote the licensing objectives.

**Fig 3(a). Putney High Street CIZ**



**Fig 3(b). Putney High Street CIZ**

| ROAD NAME           |
|---------------------|
| Brewhouse Lane      |
| Burstock Road       |
| Burston Road        |
| Carlton Drive       |
| Chelverton Road     |
| Deodar Road         |
| Disraeli Road       |
| Felsham Road        |
| Lacy Road           |
| Lower Richmond Road |
| Mascotte Road       |
| Montserrat Road     |
| Norroy Road         |
| Oxford Road         |
| Putney Bridge Road  |
| Putney High Street  |
| Putney Hill         |
| Ravenna Road        |
| Upper Richmond Road |
| Walkers Place       |
| Weimar Street       |
| Werter Road         |