

London Borough of Camden

Cumulative Impact Assessment: Research Report

October 2023

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1. EXECUTIVE SUMMARY

1.1. Overview of the project

- The London Borough of Camden commissioned independent, specialist researchers to undertake a review of the two cumulative impact policies in the borough, Seven Dials and Camden Town. The purpose of the review is to assist the Licensing Committee of the London Borough of Camden to determine whether it is appropriate to publish a cumulative impact assessment in one or more areas of the borough. The review was conducted using a varied methodology including:
 - Crime and ASB mapping
 - Analysis of CCTV provisions and data
 - London Ambulance Service and hospital data
 - Noise and cleansing data
 - Street drinking
 - Licensed premises data
 - Public consultation
 - Stakeholder interviews
 - Observation fieldwork
- Qualitative data analysis compared the most recent complete 12-month period (September 2022 to August 2023) with the financial year immediately preceding the Covid-19 pandemic (April 2019 to March 2020). This approach was chosen to avoid comparisons with data from periods when many licensed premises were closed due to Covid-19 restrictions, as the April 2019 to March 2020 period was minimally affected by lockdowns.
- The locations included in this review include:
 - Camden Town (current cumulative impact policy in place)
 - Seven Dials (current cumulative impact policy in place)
 - Fitzrovia (no current cumulative impact assessment in place)
 - Kings Cross/St Pancras/Euston (no current cumulative impact assessment in place)
 - Kentish Town (no current cumulative impact assessment in place)
 - Kilburn (no current cumulative impact assessment in place)
 - Hampstead and Swiss Cottage (no current cumulative impact assessment in place)
- Fitzrovia, Kings Cross/St Pancras/Euston, Kentish Town, Kilburn, Hampstead and Swiss Cottage are collectively referred to as Areas of Interest (Aols) for the purpose of this report.

1.2. Findings

General

- Police recorded Night-Time Economy (NTE) crime in the borough in 2022/23 increased by 1.2% (n.140) compared to 2019/20. The increase is largely driven by theft, which saw a 9.1% increase (n. 510). This contrasts with a national decrease in police recorded theft offences, with 11% fewer theft offences recorded in the year ending March 2023 compared with March 202. Excluding theft offences, the borough saw a 3.3% (n.370) reduction in all other crime types between the two periods.
- Overall, the number of incidents recorded by CCTV that could reasonably be linked to the licensed / night time economy is low in Camden, particularly when compared to the larger numbers of incidents that are recorded by the police. The reasons for this are complex (e.g. recording practices and consistency, staff resources), but overall only Camden Town has any notable clustering of incidents, and even then, it is low and mostly concentrated around Inverness Street.
- There were only seven licensed premises locations with more than ten commercial noise complaints over a two-year period captured by the LB Camden noise recording system. None of the locations were in close proximity to each other, so this data does not present any evidence of cumulative impact from noise produced by licensed premises.
- The number of alcohol-related ambulance callouts per month is not high, even pre-Covid. In 2022, there appears to have been a significant and consistent fall in alcohol-related ambulance callouts in Camden. There is, however, a strong correlation between the geographical density of licensed premises operating beyond framework hours and the number of alcohol-related ambulance callouts.
- In the borough as a whole, 83.2% of new premises applications between January 2017 and December 2022 were wholly or partially approved, compared with 83.3% in the Camden Town CIP area and 76.0% in the Seven Dials CIP area. Approval rates are therefore similar within the Camden Town CIP area compared with the whole borough, and only around 10% lower in the Seven Dials CIP area.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment relating to any area of the borough. Residents in Camden Town, Seven Dials, Kentish Town and Fitzrovia all expressed a strong desire to publish a CIA in the area in which they reside. Despite several attempts, no interview was held with residents from Kilburn, King's Cross/St Pancras/Euston or Swiss Cottage and South Hampstead.
- There are many alternative approaches available to LB Camden and partners to manage challenges within its night time centres and facilitate opportunities for improvements identified in this review. Suggested alternative approaches and relevant case studies have been presented at the end of this report.

Camden Town

- A wide variety of stakeholders referenced the historical significance of Camden Town's night time offer during the research. It is also felt that the current night time offer does not reflect this and instead lacks the diversity and quality that once made it stand out.
- Camden Town is predominantly made up of wet-led premises and lacks alternatives such as restaurants and LGBTQIA+ premises. Residents suggested that the current offer leads to excessive levels of intoxication.
- The recorded NTE crime in Camden Town CIP area was 7.7% (n. 126) higher in 2022/23 compared with 2019/20. This was driven in the most part by theft offences, which increased by 43.4% (n.273). Excluding these offences, the Camden Town CIP area saw a 9.1% (n. 147) decrease in all other offences between the two periods analysed.
- Violent offences recorded at night in Camden Town increased by 2.4% between the two periods analysed, while nationally a comparative figure is 20.0%. Drugs offences recorded between 18:00 and 05:59 have fallen by 54.3% and NTE Anti-Social Behaviour (ASB) by 24.6%.
- Camden Town is the area in the borough where the largest number of CCTV incidents are recorded that can be reasonably linked to the NTE and licensed premises customers. However, even here there are relatively few over the course of three years (2021 to 2023): 156 to 323 per year (an average of 3.0 to 6.2 per week). Those that do occur are mainly linked to occasional violence and drug dealing. Inverness Street and the London Underground Station are the most frequently cited locations.
- London Ambulance Services alcohol-related callouts in the Camden Town CIP area between 2019 and 2022 was 12.0 per hectare (the average number of callouts per hectare in Camden over this same period was 0.9). This is similar to the Seven Dials CIP area.
- However, the absolute number of alcohol-related callouts between 2019 and 2022 in Camden Town CIP was 1,085 or 18.4% (of the 5,891 borough total), which is significantly higher than Seven Dials CIP (where it was 420).
- However, initiatives (such as Ask for Angela and the Safe Point) and other improvements that have been implemented in Camden Town were noted and commended by both the researchers and stakeholders alike.
- Of the seven licensed premises locations with more than ten commercial noise complaints over a two-year period in LB Camden, three were in the Camden Town CIP area (14, 14 and 13 complaints respectively across a 24-month period), with none in proximity to each other. This data therefore does not present any evidence of cumulative impact from noise produced by licensed premises.
- As well as the homogenised offer, stakeholders reported issues around Camden Town underground station, the design of which prevents it from servicing the passenger levels without negative impacts on the surrounding area, its residents and businesses. This

issue is exacerbated at night as one of the entrances to the station is closed leading to crowding that is not currently proactively managed.

- Both stations in Camden Town are street drinking hotspots. Public drinking occurs around the existing cumulative impact policy area but is predominantly concentrated here. It was noted that issues around public drinking have improved compared to the historical situation. This crowding and public drinking leads to increased litter, something that appears to be an issue across Camden Town due to a disjointed approach to managing it.
- In terms of those with street-based lifestyles, there are some street drinking locations at the periphery of the Camden Town CIP, but these appeared well cleansed by the council's environment team.
- The number of *new* licences granted between January 2017 and December 2022 in the Camden Town CIP area was 182. This was an approval rate of 83.3% - one percentage point above the borough figure of 83.2%. The number of *major* variations granted was 80. This was an approval rate of 76.3% - around one percentage point higher than the borough figure. The number of *minor* variations granted was 56. This was an approval rate of six percentage points higher than the borough figure. Overall, relatively, more applications were granted in the Camden Town CIP area than the borough average over this period.
- Residents feel strongly that a cumulative impact assessment for Camden Town is necessary. The reasons given all relate to addressing existing issues in the area, such as noise. None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in Camden Town.
- Other stakeholders felt that a CIA should not be published for Camden Town, or if one is published, to reduce it from its current size so that it is focused on the hotspot areas. Many non-resident stakeholders believe the current cumulative impact policy discourages investment and new openings in Camden Town, which exacerbates the lack of diversity in the offer.

Seven Dials

- Seven Dials has a strong food-led offer and an attractive streetscape however there is very little in the way of an offering outside of food. This is particularly noticeable beyond 23:00 as most of the premises close, leaving very little to do in the area. Where there are later opening premises, it was apparent that door staff were exceptionally well trained, supporting vulnerable people to get home safely and generally ensuring good dispersal from the area. This was also true on peak nights, for example on St Patrick's Day where additional door staff, marshals and other support tools were employed to keep people safe.
- There is a difference in offer, visitors and behaviour in the central parts of the existing cumulative impact policy area compared with the outskirts. Centrally, there are very few issues around street drinking, dispersal and litter. However, on the Charing Cross Road

border, some of these issues are present. This is most noticeable late at night around the part of Tottenham Court Road Station within Camden. Dispersal there is poor, leading to noise from crowds building up, street drinking, drug dealing and litter.

- The Seven Dials area saw an increase in police recorded NTE crime of 28.5% (n. 312), driven in the main by theft, which increased by 46.9% (n.348). Excluding theft offences, Seven Dials recorded 3.3% fewer NTE offences in 2022/23 compared with 2019/20.
- Seven Dials recorded 10.4% (n.24) fewer NTE violent offences in 2022/23 than in 2019/20, and NTE related ASB fell by 40.2% (n.35).
- There is very little CCTV evidence suggesting problems in Seven Dials. Over a three-year period (2021 to 2023) the number of incidents per year is estimated at between 6 and 66. Virtually all of these take place in the north and west of the current CIP area (around New Oxford Street, Holborn / Kingsway and Bloomsbury, not inside Seven Dials itself). There is no specific indecent type that prevails.
- London Ambulance Services alcohol-related callouts in the Seven Dials CIP area between 2019 and 2022 was 12.2 per hectare (the average number of callouts per hectare in Camden over this same period was 0.9). This is similar to the Camden Town CIP area. In absolute figures, 420 (7.1%) of the borough's 5,891 alcohol-related call outs over four years (2019-22) were in this area.
- There is very limited evidence of street drinking in the Seven Dials CIP area. Most of the drinking hotspots in the south of the borough are to be found further to the east in the Bloomsbury area, e.g. Tavistock Square, Bloomsbury Square and also in Lincoln's Inn Fields.
- The number of *new* licences granted between January 2017 and December 2022 in the Seven Dials CIP area was 121. This was an approval rate of 76% (around seven percentage points below the borough figure of 83.2%). The number of *major* variations granted was 29. This was an approval rate of 65.5% - ten percentage points lower than the borough figure. The number of *minor* variations granted was 52. This was an approval rate of seven percentage points higher than the borough figure. Overall, proportionally fewer significant applications were granted in the Seven Dials CIP area than the borough average over this period, albeit a substantially larger proportion of minor variations were granted.
- Again, residents groups were the only stakeholders to strongly call for a cumulative impact assessment for Seven Dials. As with Camden Town, the reasons given related to existing issues in the area, such as noise. The impact of additional outdoor dining was highlighted as a particularly big driver of the increase in noise issues in Seven Dials.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in Seven Dials. Other stakeholders expressed a desire not to publish a cumulative impact assessment, the strength of feeling was even greater than that in Camden Town. Reasons given again included the costs of obtaining a licence with a cumulative impact assessment in place would be prohibitive to new,

innovative entrepreneurs that would bring much-needed diversity to the area. Many stakeholders believe that the current cumulative impact policy area for Seven Dials is too large and if a new cumulative impact assessment is published, the boundary should be revised to capture the areas where any negative impact can be evidenced.

Fitzrovia

- Similarly to Seven Dials, Fitzrovia has an exceptional food-led offer, summarised in the Business Improvement District's marketing claim "*eat your way around the world in Fitzrovia*". The food-led offer also creates a similar situation to that in Seven Dials where most premises close at 23:00hrs. Dispersal from premises appeared to be relatively calm when the researchers were conducting observational fieldwork here.
- Residents don't take issue with most types of premises in the area but are concerned by the noise generated by the footfall they bring. One of the biggest concerns around noise is around the outdoor eating "streateries" that have been installed. There is worry about the levels of noise that are generated through their use. The researchers, as well as other stakeholders, also noted that they do not fit in aesthetically with the strong streetscape in Fitzrovia.
- In Fitzrovia, the overall volume of NTE related offences has decreased by 2.7% (n. 38) in 2022/23 from 2019/20 volumes. The volume of offences of each type remains broadly similar between the two periods, except for violent offences, which saw a 20.9% (n.52) reduction.
- There is very little CCTV evidence suggesting problems in Fitzrovia. Over a three-year period (2021 to 2023) the number of incidents per year is estimated at between 12 and 42. Virtually all these take place on Tottenham Court Road not inside Fitzrovia itself. There is no specific indecent type that prevails.
- Fitzrovia has an above average density of alcohol-related call outs, relative to the borough, but it is less intense than Camden Town and Seven Dials. The alcohol-related call outs appear to be mostly concentrated on the Tottenham Court Road / New Oxford Street corner rather than internally within Fitzrovia. This is likely due to the food-led offer and limited number of premises open beyond the framework hours in Fitzrovia proper.
- There is very limited street drinking in Fitzrovia, although Whitfield Gardens is used as a street drinking hotspot and on the night of the observational fieldwork there was a noticeable increase in street drinking litter in the area.
- Residents groups were the only stakeholders to support a cumulative impact assessment for Fitzrovia, the reasons given related to existing issues in the area, such as noise.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in Fitzrovia.

Kings Cross/St Pancras/Euston

- The area around the major train stations in LB Camden sees many people pass through on their way to other parts of the borough and city. The visually impressive public realm,

such as Coal Drops Yard, presents visitors with a positive welcome to Camden, however at night increased amounts of litter across the area distract from this. No visible policing was present on the night of the audit, which would have been beneficial given the high footfall through the area.

- For the King's Cross/St Pancras/Euston area of interest, the overall volume of NTE related offences has reduced by 1.8% (n. 16) between 2019/20 and 2022/23. This was driven by reductions in theft (14.6%, n.71) and NTE related ASB (24.3%, n.44) but was offset somewhat by an increase in violent offences (19.8%, n50).
- Euston and Kings Cross/St Pancras (and the Granary Square and new development area to the north), have alcohol-related ambulance callouts that are higher than the borough median, though they are not of the scale of Camden Town and Seven Dials.
- There is some modest CCTV evidence suggesting problems in Kings Cross/St Pancras/Euston. Over a three-year period (2021 to 2023) the number of incidents per year is estimated at between 30 and 114 (an average of between 0.6 and 2.2 per week). The main incident types captured on CCTV were snatch thefts (particularly around Euston) and violence and nuisance behaviour in the street drinking hotspots to the south of Kings Cross.
- The wider Kings Cross area is a hotspot for street drinking (by those with street-based lifestyles) and public drinking (those using the NTE). Street drinking is a significant issue in Argyle Square and it appears linked to incidents of disorder in the area that are picked up by CCTV. Public drinking, including people leaving premises with open containers, appeared to be a particular issue around the station itself, Pentonville and Grays Inn Road, which is further evidenced by large quantities of broken glass in the street at night.
- Premises in the area suggested that the establishment of a Pubwatch Scheme and more information about expected passenger numbers and other relevant local intelligence would be useful to support safety and management of premises and in turn, the area.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in this area. Despite repeated attempts, it was not possible to speak to residents groups in Kings Cross/St Pancras/Euston to obtain a view from residents as to whether it would be appropriate to publish a Cumulative Impact Assessment for the area.

Kentish Town

- Kentish Town stood out for having a really strong early evening offer. The high street was still busy and vibrant around 18:30 with a variety of premises open and a diverse group of users in the area. It was apparent that litter was becoming an issue already at the time, with what appeared to be a disjointed approach to the management of commercial waste and time of operation of cleansing teams.
- The late-night offer in Kentish Town, whilst varied and interesting, did not appear busy. The O2 Forum here was noted as a standout premises in the borough by several

stakeholders, both for the variety of events put on and for its community engagement work. Overall, the review found few issues in this part of the borough.

- The volume of police recorded NTE related crime in Kentish Town is much lower than the CIP areas or the above areas of interest. In the 12 months from 1st September 2022, Kentish Town recorded an average of 2.8 NTE offences per week.
- There is very little CCTV evidence suggesting problems in Kentish Town. Over a three-year period (2021 to 2023) the number of incidents per year is estimated at between 0 and 18. There is no apparent pattern to the types of incidents captured here.
- There is a slight increase, above borough average, in levels of LAS alcohol-related call outs to the Kentish Town Road, but the difference is minor.
- There is limited street or public drinking in Kentish Town, with only occasional street drinking detritus seen during the observations.
- As with residents groups in other parts of the borough included in this review, residents were the only stakeholders to support a cumulative impact assessment for Kentish Town, with the reasons given again being related to existing issues in the area, such as noise.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in this area of interest.

Kilburn

- Kilburn High Road has a broad range of uses that encompasses both independents and national chains. Whilst having a strong daytime offer, licensed and gambling premises make up a significant part of the land use here and it is busy at nearly all times of the day, albeit quieter after midnight.
- Post-midnight the key uses are late night refreshment venues. It has a significant number of pubs, some on the corners of residential side roads.
- The volume of police recorded NTE related crime in Kilburn is much lower than the CIP areas or the above areas of interest of Fitzrovia and Kings Cross/St Pancras/Euston. In the 12 months from 1st September 2022, Kilburn recorded an average of 3.0 NTE offences per week.
- There is virtually negligible CCTV evidence suggesting problems in Kilburn. Over a three-year period (2021 to 2023) the number of incidents per year is estimated at between 6 and 12.
- There is little evidence of LAS alcohol-related call outs to Kilburn or the Kilburn High Road being significant.
- There is limited street or public drinking on Kilburn High Road itself, with only occasional drinking detritus seen during the observations in Kilburn Grange park.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in Kilburn. Despite repeated attempts, it was not possible

to speak to residents groups in the area to obtain a view from residents as to whether it would be appropriate to publish a Cumulative Impact Assessment in Kilburn.

Swiss Cottage and South Hampstead

- The volume of police recorded NTE related crime in Kilburn is much lower than the CIP areas or the above areas of interest of Fitzrovia and Kings Cross/St Pancras/Euston. In the 12 months from 1st September 2022, Kilburn recorded an average of 3.4 NTE offences per week.
- As part of the review, observational fieldwork was carried out at these locations, interviews were conducted with local stakeholders and data relevant to these areas was analysed. The predominantly residential make-up of these areas presented little of note in terms of findings relevant to the review.
- The largest number of noise/environmental health complaints in Camden between January 2021 and December 2022 was in relation to a late-night food premises. This equated to 16 complaints with the majority of these being about food smells.
- There is negligible CCTV evidence suggesting any problems in Swiss Cottage and South Hampstead. In 2021 and 2022 no incidents were captured. In 2023 the number of incidents estimated over the year is six.
- There is some increased LAS alcohol-related call out activity along the Finchley Road, but it is very moderate relative to other parts of the borough, such as Camden Town, Seven Dials, Euston /Kings Cross / St Pancras and Tottenham Court Road area.
- There are no significant street drinking hotspots here and there was no drinking detritus seen during the observations.
- None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in Swiss Cottage and South Hampstead. It was not possible to speak to residents groups in the area to obtain a view from residents as to whether it would be appropriate to publish a Cumulative Impact Assessment in this area, although repeated attempts to do so were made.

2. INTRODUCTION

2.1. Cumulative impact

2.1.1. What is cumulative impact?

- 2.1.1.1. Section 5A of the Licensing Act 2003 (2003 Act) allows a licensing authority to publish a cumulative impact assessment (CIA) if it considers that the number of premises licences and club premises certificates in a defined area is such that it is likely that granting further relevant authorisations would be inconsistent with its duty to promote the four licensing objectives.
- 2.1.1.2. A CIA must set out the evidence for the authority's opinion expressed in the assessment.
- 2.1.1.3. What is meant by "cumulative impact" is explained in the guidance issued under Section 182 of the 2003 Act (the S182 Guidance):

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

2.1.2. What is a cumulative impact assessment?

- 2.1.2.1. Prior to 2018, “cumulative impact” and cumulative impact policies (CIPs) did not have a statutory basis, they were only described in the S182 Guidance.
- 2.1.2.2. In 2016, the Government published its Modern Crime Prevention Strategy which included a range of measures to prevent alcohol-related crime and disorder. One of these was to put CIPs “on a statutory footing, to strengthen the ability of authorities to control the availability of alcohol and reduce alcohol-related crime and disorder, as well as providing industry with greater clarity about how they can be used”.
- 2.1.2.3. The CIP scheme previously set out in the S182 Guidance, was replaced by the new statutory scheme for CIAs contained in section 5A of the 2003 Act, which came into force on 6 April 2018.
- 2.1.2.4. Below is the description of CIAs provided in the S182 Guidance:

- 14.24 A cumulative impact assessment (CIA) may be published by a licensing authority to help it to limit the number or types of licence applications granted in areas where there is evidence to show that the number or density of licensed premises in the area is having a cumulative impact and leading to problems which are undermining the licensing objectives. CIAs relate to applications for new premises licences and club premises certificates and applications to vary existing premises licences and club premises certificates in a specified area.
- 14.25 Section 5A of the 2003 Act sets out what a licensing authority needs to do in order to publish a CIA and review it, including the requirement to consult with the persons listed in section 5(3) of the 2003 Act. The 2003 Act does not stipulate how the CIA should be used once published, because the requirements for determining applications for new licences or variations are the same in areas with a CIA as they are elsewhere, as set out in sections 18, 35, 72 and 85 of the Act. However, any CIA published by a licensing authority must be summarised in its statement of licensing policy. Under section 5(6D) a

Continued overleaf...

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

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

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

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

2.1.2.5. A CIA is a discretionary means by which a licensing authority may control the number of new licensed premises within a defined geographical area and restrict the alteration of existing premises within the CIA area. It is not a measure that will address relevant issues from existing licensed premises. Those issues would need to be dealt with using other powers, such as an application to review an individual premises licence.

2.1.2.6. The steps to be followed in considering whether to publish a CIA are summarised in the S182 Guidance:

- Identify concern about crime and disorder; public safety; public nuisance or protection of children from harm in a particular location.
- Consider whether there is good evidence that crime and disorder or nuisance are occurring, or whether there are activities which pose a threat to public safety or the protection of children from harm.

- If there is evidence that such problems are occurring, identify whether these problems are being caused by the customers of licensed premises, or that cumulative impact is imminent.
- Identify the boundaries of the area where problems are occurring (this can involve mapping where the problems occur and identifying specific streets or localities where such problems arise).
- Consult those specified in section 5(3) of the 2003 Act. As with consultations in respect of the licensing policy statement as a whole, it is for each licensing authority to determine the extent of the consultation it should undertake in respect of a CIA (subject to the statutory requirements).
- For the purposes of the consultation provide the persons specified in section 5(3) with the following information:
 - the reasons why it is considering publishing a CIA;
 - a general indication of the part or parts of its area which it is considering describing in the assessment;
 - whether it considers that the assessment will relate to all premises licence and club premises certificate applications and variation applications, or only to those of a particular kind described.
- Subject to the outcome of the consultation, include and publish details of the CIA, including the evidence in support of the assessment and the particular kinds of premises the assessment relates to. Licensing authorities are not restricted to using general terms such as on-trade, off-trade and late-night refreshment providers, and can apply their own descriptions such as vertical-drinking bars and nightclubs if appropriate.
- Summarise the licensing authority's opinion in light of the evidence of cumulative impact (or any revision to an existing opinion) in the licensing policy statement and explain within the policy statement how the authority has had regard to any CIAs it has published under section 5A. The summary within the licensing policy statement should include but is not limited to the nature of the problems identified and the evidence for such problems; the geographical extent of the area covered by the assessment; the types of premises described in the assessment; and the types of applications for which it would likely be inconsistent with the licensing authority's duty to promote the licensing objectives to grant.

2.1.2.7. As noted in the S182 Guidance, there must be an evidential basis for the decision to publish a CIA. Evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the relevant problems identified in the specific area to be covered by the CIA.

- 2.1.2.8. A CIA may relate to all relevant authorisations or only to relevant authorisations of a particular kind, as described in the assessment. As such, it could include all licensed premises, or it may only include off-licences, or only the on-trade or specific descriptions of on-licensed premises (for example, nightclubs).
- 2.1.2.9. When considering the evidence base for publishing a CIA, a licensing authority should consider the contribution to cumulative impact made by different types of premises within its area, in order to determine the appropriateness of including different types of licensed premises within the CIA.
- 2.1.2.10. A CIA does not change the fundamental way that licensing decisions are made. As with all licensing applications under the 2003 Act, if there are no representations, the licensing authority must grant the application in terms that are consistent with the operating schedule submitted.
- 2.1.2.11. The CIA must stress that it does not relieve responsible authorities (or any other persons) of the need to make relevant representations where they consider it appropriate to do so for the promotion of the licensing objectives. Anyone making a representation may base it on the evidence published in the CIA, or the fact that a CIA has been published.
- 2.1.2.12. It remains incumbent on all responsible authorities and other persons to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing.
- 2.1.2.13. When representations are received, there is a fundamental difference between CIPs and CIAs. Under the previous scheme contained in the S182 Guidance, the effect of adopting a special policy created a rebuttable presumption that applications for the grant or variation of premises licences or club premises certificates which were likely to add to the existing cumulative impact would normally be refused or subject to certain limitations, That presumption has not been replicated in the statutory scheme contained in section 5A of the 2003 Act and it does not therefore apply to a CIA.
- 2.1.2.14. Notwithstanding receipt of any representations, it is possible for the licensing authority to grant an application relating to premises in a CIA area where it considers it is appropriate and where the applicant can demonstrate that they would not be adding to the cumulative impact.
- 2.1.2.15. A licensing authority must review a CIA within three years to establish if there continues to be evidence to justify the retention of a CIA. The authority must publish a statement on whether it remains, or no longer remains of the opinion set out in the CIA.
- 2.1.2.16. Having published a CIA a licensing authority must have regard to the assessment (provided it is still in existence) when it next reviews its statement of licensing policy.

- 2.1.2.17. The absence of a CIA does not prevent any responsible authority or other person making representations on an application for the grant or variation 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, In each case it would be incumbent on the person making the representation to provide relevant evidence of cumulative impact.
- 2.1.2.18. The researchers remain impartial in the pursuance of the research. It is for the elected members sitting on the licensing committee to decide whether or not to publish a cumulative impact assessment after considering the available evidence and consulting those individuals and organisations listed in section 5(3) of the 2003 Act and any others.

2.2. Introduction to the research

- 2.2.1.1. The London Borough of Camden commissioned specialist researchers to undertake a review of the two Cumulative Impact Policies (CIPs) in the borough, Seven Dials and Camden Town.
- 2.2.1.2. The aim of the review was to assist the Licensing Committee to determine whether these policies are still relevant, in the light of the amended statutory requirements, and to highlight any changes that could be implemented to better support the four objectives of the Licensing Act. These objectives are:
- the prevention of crime and disorder
 - public safety
 - the prevention of public nuisance
 - the protection of children from harm.
- 2.2.1.3. The review recognised that Seven Dials and Camden Town represents the economic heart of licensed and entertainment premises in Camden, and that pubs and other licensed premises play an important role in their local communities. It found that by minimising the regulatory burden on businesses the local authority could encourage innovation and support responsible premises.
- 2.2.1.4. The review also considered the impact of COVID-19 and the prevailing cost of living crisis and other challenges facing businesses in these areas.
- 2.2.1.5. The borough recognised that work was underway to develop an ENTE strategy for the borough by the innovative business team, supported by a specialist consultancy. The cumulative impact review project team engaged with the innovative business team and ENTE strategy researchers at an early stage to identify where the ENTE strategy research could add value to the cumulative impact review and maximise the use of resources by avoiding duplication.

2.3. Methodology

- 2.3.1.1. This report aims to provide the Licensing Committee with information to assist them to decide whether to effectively retain or vary the two CIPs by publishing new Cumulative Impact Assessments or remove them completely. To achieve this, a mixed-method approach was used that involved both qualitative and quantitative data collection techniques.
- 2.3.1.2. The detailed methodological approach to each set of data is set out at the start of each section. The data is organised into the following sections:
- Crime and ASB mapping
 - CCTV
 - London Ambulance Service data
 - Noise and cleansing
 - Street drinking
 - Licensed premises data
 - Public consultation and stakeholder interviews
 - Observation fieldwork.

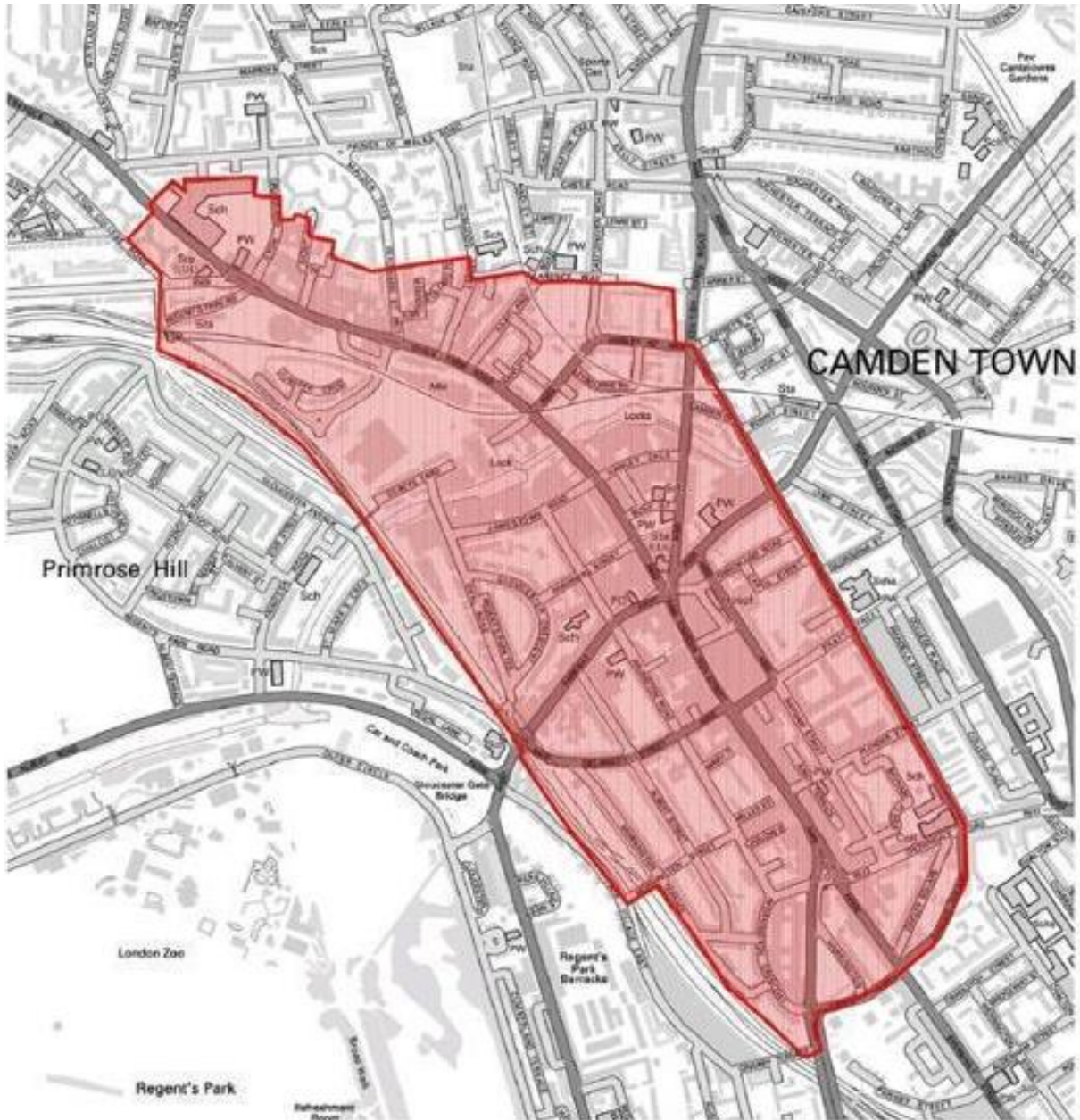
3. FINDINGS

3.1. Context

3.1.1. The existing Cumulative Impact Policy Areas

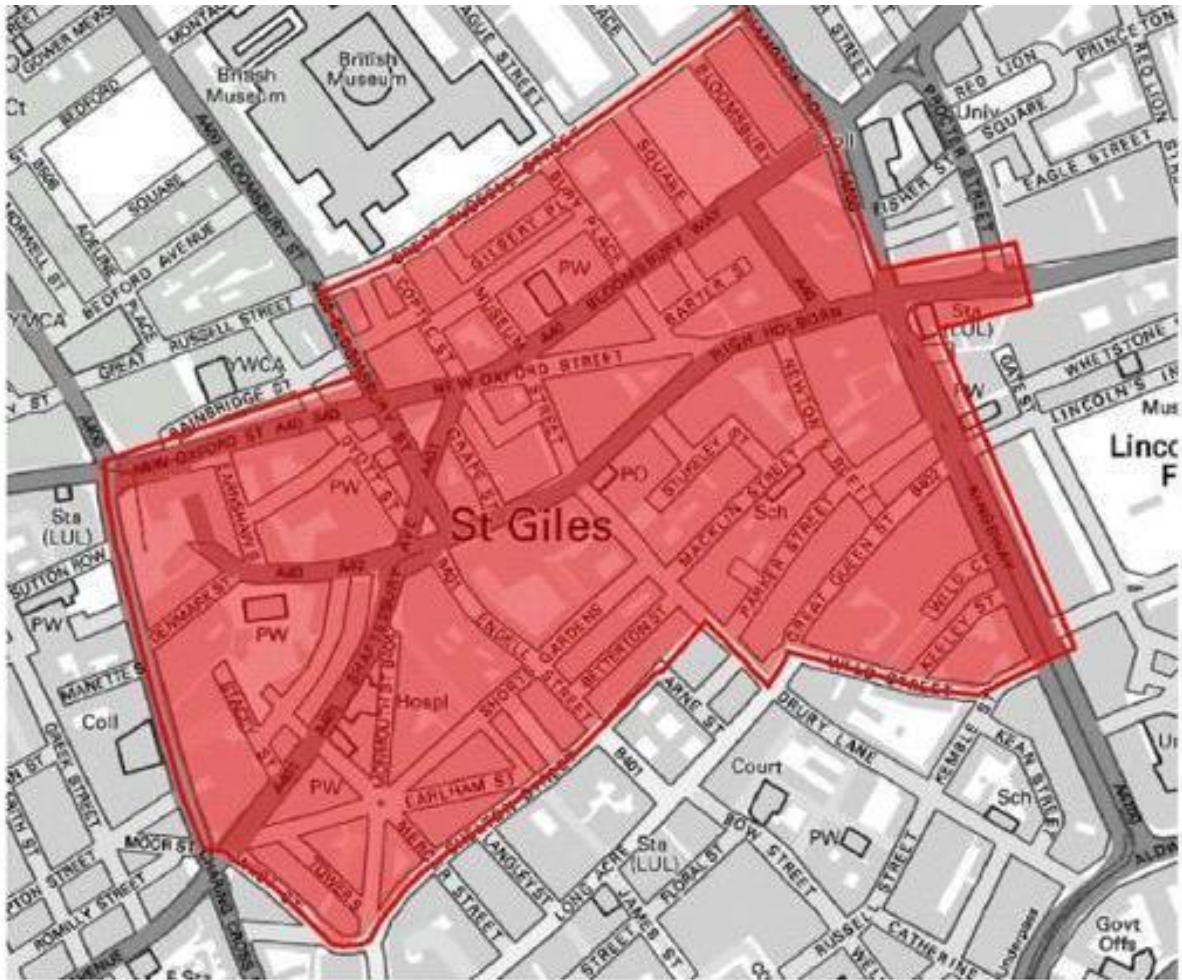
3.1.1.1. The maps below show the two existing cumulative impact policy areas adopted in 2022 by the Council in its *Statement of Licensing Policy 2022-2027*.

Figure 1. Camden Town Cumulative Impact Policy Area



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Figure 2. Seven Dials Cumulative Impact Policy Area



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3.2. Crime and ASB

3.2.1. Introduction

- 3.2.1.1. Crime and ASB data and its mapping are probably the most important part of any cumulative impact review, albeit this is not explicitly set out in the S182 Guidance. It is important because it is consistently collected over a period of years which allows the most effective temporal and spatial analysis.
- 3.2.1.2. This consistency is important for elected members when gauging whether they feel cumulative impact exists in an area.
- 3.2.1.3. However, there are limitations on the data, even if it is of high quality. For example, much crime is not reported (see below) so the impacts are likely to be greater than shown, particularly on lower-level crimes such as anti-social behaviour.

3.2.2. Methodology

- 3.2.2.1. The researchers put in a structured data request to the community safety team at Camden Council, who was able to secure data from the Metropolitan Police Service. This data was then anonymised, and analysis undertaken. The data was also used to produce *hotspot maps* that provide the location and intensity of the incidents.
- 3.2.2.2. The offence types (crime types) requested included violence offences, sexual offences, robbery, theft from the person, criminal damage, public fear, alarm or distress and drugs offences.
- 3.2.2.3. Due to the sensitive nature of the offences, the location coordinates for sexual offences were not provided. Because of this, only a percentage change comparison between the boroughs and the CIP areas and areas of interest has been included.
- 3.2.2.4. The ASB incident types requested included rowdy or inconsiderate behaviour, drugs incidents, noise, street drinking, alcohol related, licensing related, criminal damage and street drinking.
- 3.2.2.5. Only offences and incidents that took place between 18:00 and 05:59 were included in this report. As a collective, these are those crimes and incidents that are most likely to be associated with the night-time economy, the customers of licensed premises and street drinking. **It is important to note that not all crimes and ASB incidents within these hotspots will be related to the negative impact of users of licensed premises.**
- 3.2.2.6. Ordinarily, analysis would be undertaken on the intervening years between any cumulative impact reports, as well as the most recent twelve-month period. In

the intervening period between the implementation of the most recent cumulative impact policies in Camden Town and Seven Dials, however, the impact of Covid 19 lockdowns and restrictions on many months during that period prevents robust year-on-year comparisons from being made.

- 3.2.2.7. The analysis of police recorded crime and ASB in this report therefore focuses on the financial year leading up to the Covid pandemic (April 2019 to March 2020), when only a handful of days were impacted by the Covid lockdown, and the most recent complete twelve-month period at the date of this report (September 2022 to August 2023). This reflects a similar approach as that of the Office of National Statistics (ONS) over the same period of discounting twelve-month periods significantly affected by Covid when drawing analytical comparisons.
- 3.2.2.8. The data was requested for the whole of Camden borough and then disaggregated into the two existing CIP areas in Camden Town and Seven Dials, as well as several other 'areas of interest': Fitzrovia, Kings Cross/St Pancras/Euston, Kentish Town, Kilburn and Hampstead/Swiss Cottage. These are useful both to understand change in crime and disorder and ASB in these locations and as 'control' comparators for the two existing CIP areas.
- 3.2.2.9. It is important to note that areas of "heat" on the hotspot maps for each offence will represent different volumes of offences in each instance. This is because the "hot spots" shown on each map are simply the areas of greatest concentration of those offences on that specific map, rather than comparatively between two or more maps.
- 3.2.2.10. A map showing 100,000 offences will have hot spots, as will a map showing 1,000 offences. Depending on the location of those offences, both maps may even look similar, although they represent very different volumes of crime. Hot spot mapping therefore helps to contextualise location of crime, where the tables, graphs and narrative provided seek to provide information on the volume, proportion in each area, and changes in such over time.

3.2.3. Findings

- 3.2.3.1. The findings below are set out by offence and ASB type. Where it is helpful, incident types have been grouped together to create a more complete picture. For example, the section on drugs includes all NTE drugs-related offences and NTE drugs-related ASB incidents.

3.2.4. All crime

- 3.2.4.1. The following tables, charts and hotspot maps set out the key changes over time for *all crime* groups (between 18:00hrs and 05:59hrs) that may be *relevant* to the clustering of licensed premises, their customers and the operation of the NTE.

Figure 3. ALL relevant night-time (18:00 – 05:59) crime in Camden, 2019/20 and 2022/23

	NTE all offences 2019/2020	% whole borough offences 2019/2020	NTE all offences 2022/2023	% whole borough offences 2022/2023	% change 2019/2020 vs. 2022/2023
Whole borough	11,359	-	11,499	-	+1.2%
Camden Town	1637	14.4%	1763	15.3%	+7.7%
Seven Dials	1093	9.6%	1405	12.2%	+28.5%
Fitzrovia	1384	12.2%	1346	11.7%	-2.7%
KX / St Pancras/ Euston	880	7.7%	864	7.5%	-1.8%
Hampstead / Swiss Cottage	158	1.4%	176	1.5%	+11.4%
Kentish Town	131	1.2%	145	1.3%	+10.7%
Kilburn	146	1.3%	158	1.4%	+8.2%

Figure 4. ALL relevant night-time (18:00-05:59) crime in the London Borough of Camden 2019-20

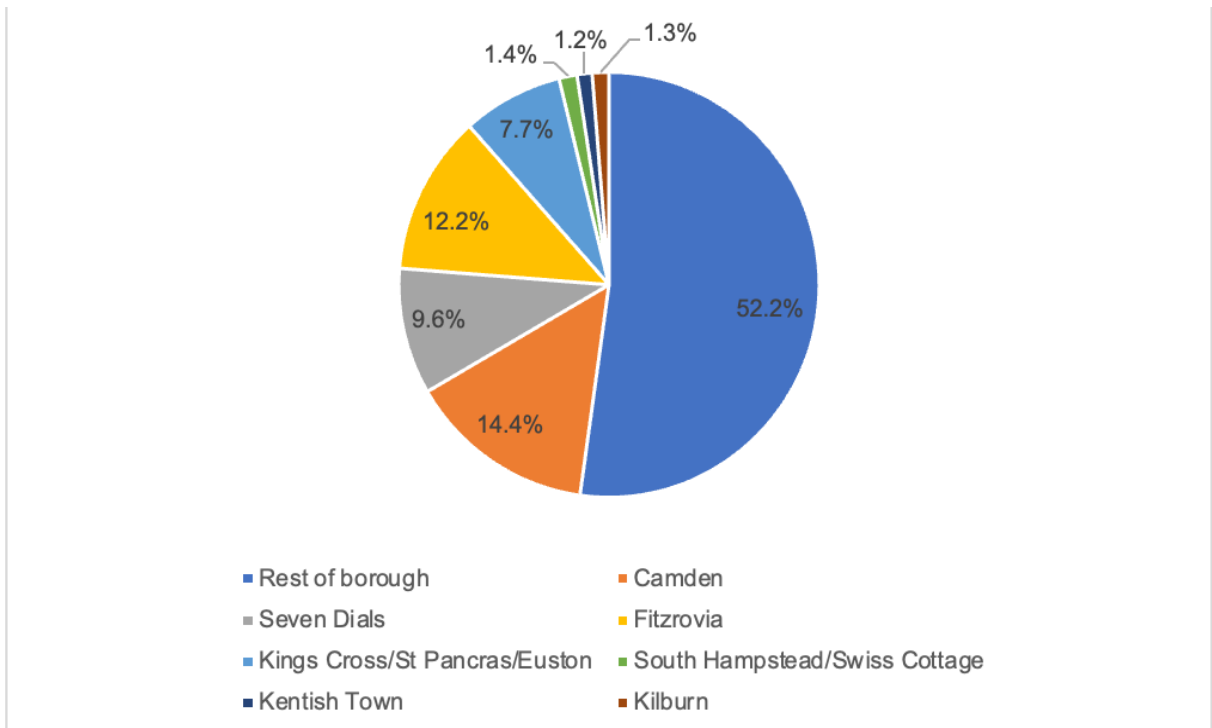


Figure 5. ALL relevant night-time (18:00-05:59) crime in the London Borough of Camden 2022/23

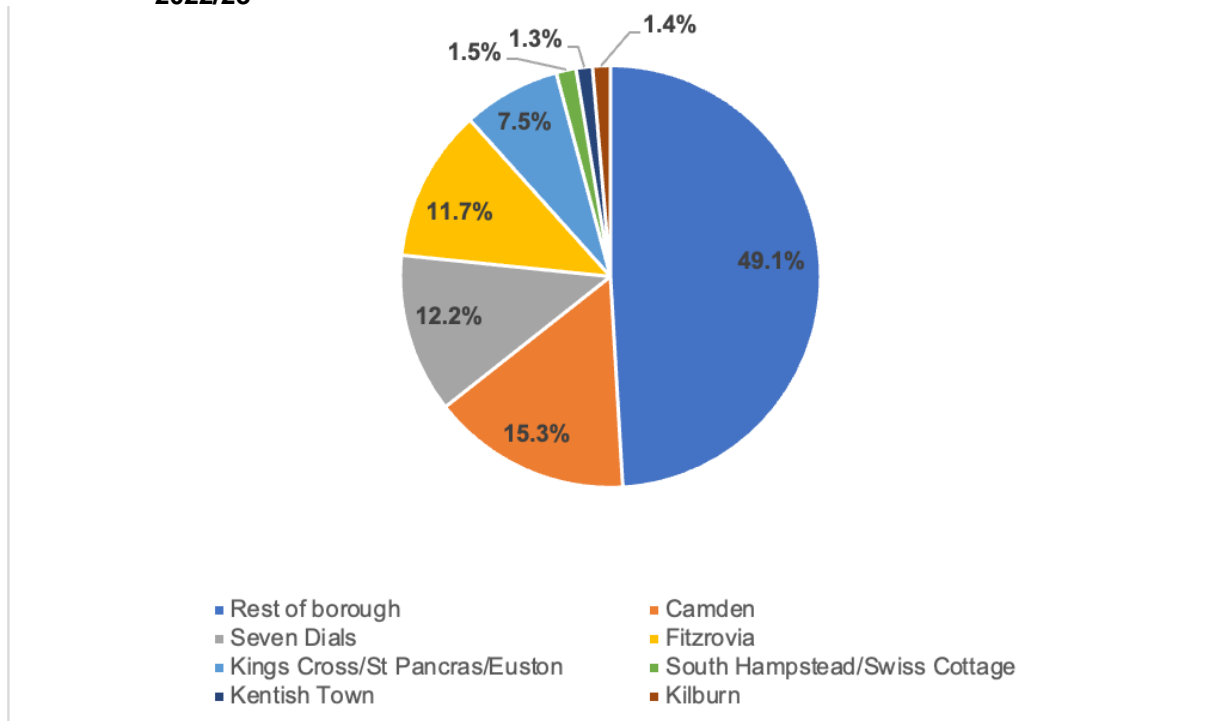
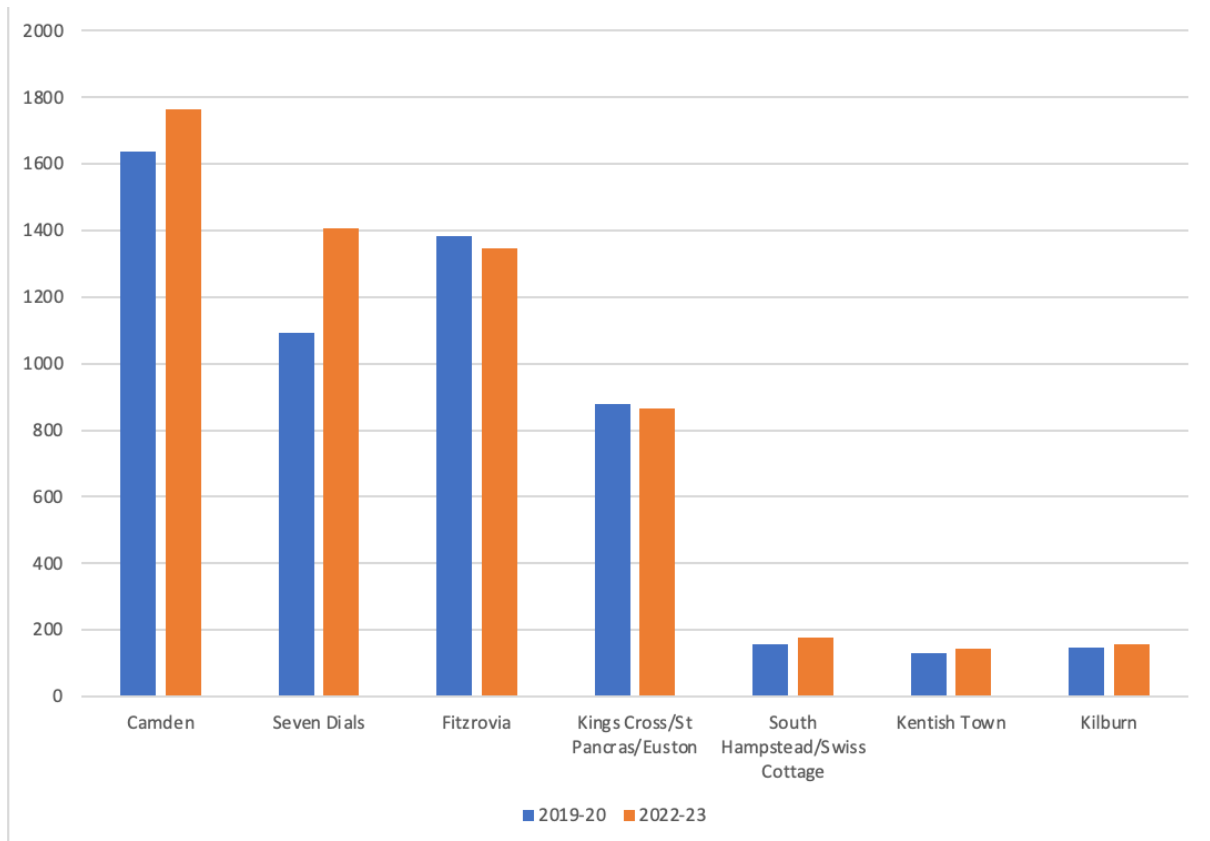


Figure 6. Comparison of ALL relevant night-time crime (18:00-05:59) 2019/20 vs 2022/23



- 3.2.4.2. Police recorded *all crime* at night in the borough, and which *may* have a link to the NTE and licensed premises customers, increased in 2022/23 by +1.2% (n.140) compared to 2019/20.
- 3.2.4.3. The increase was largely driven by *theft*, which saw a +9.1% increase (n. 510). Excluding *theft* offences, the borough saw a -3.3% (n.370) reduction in all other crime types between the two periods.
- 3.2.4.4. Recorded *all crime* at night, and which *may* have a link to the NTE and licensed premises customers, in the Camden Town CIP area was +7.7% (n. 126) higher in 2022/23 compared with 2019/20.
- 3.2.4.5. This again was driven in most part by *theft* offences, which increased by +43.4% (n.273). Excluding these offences, the CIP area saw a -9.1% (n. 147) decrease in all other offences between the two periods.
- 3.2.4.6. The picture is similar in Seven Dials CIP area, which saw an increase in police recorded *all crime* at night, and which *may* have a link to the NTE and licensed premises customers, of +28.5% (n. 312), This was driven in the main by *theft*, which increased by +46.9% (n.348). Excluding *theft* offences, Seven Dials recorded -3.3% fewer relevant night-time *all crime* offences in 2022/23 compared with 2019/20.
- 3.2.4.7. For the Fitzrovia and King's Cross/St Pancras/Euston areas of interest, the overall volume of *all crime* at night in the borough, and which *may* have a link to the NTE and licensed premises customers, has reduced between the two periods analysed by -2.7% (n. 38) and -1.8% (n. 16) respectively.
- 3.2.4.8. The volume of police recorded *all crime*, which *may* have a link to the NTE and licensed premises customers, in the other areas of interest (Aols) is much lower than the above areas. In the 12 months from 1st September 2022, Hampstead/Swiss Cottage recorded an average of 3.4 relevant offences per week (176 in the year), Kentish Town recorded 2.8 (145) and Kilburn 3.0 (158).

Figure 7. Density of ALL relevant night-time crime (18:00-05:59) in Camden, 1st April 2019 to 31st March 2020

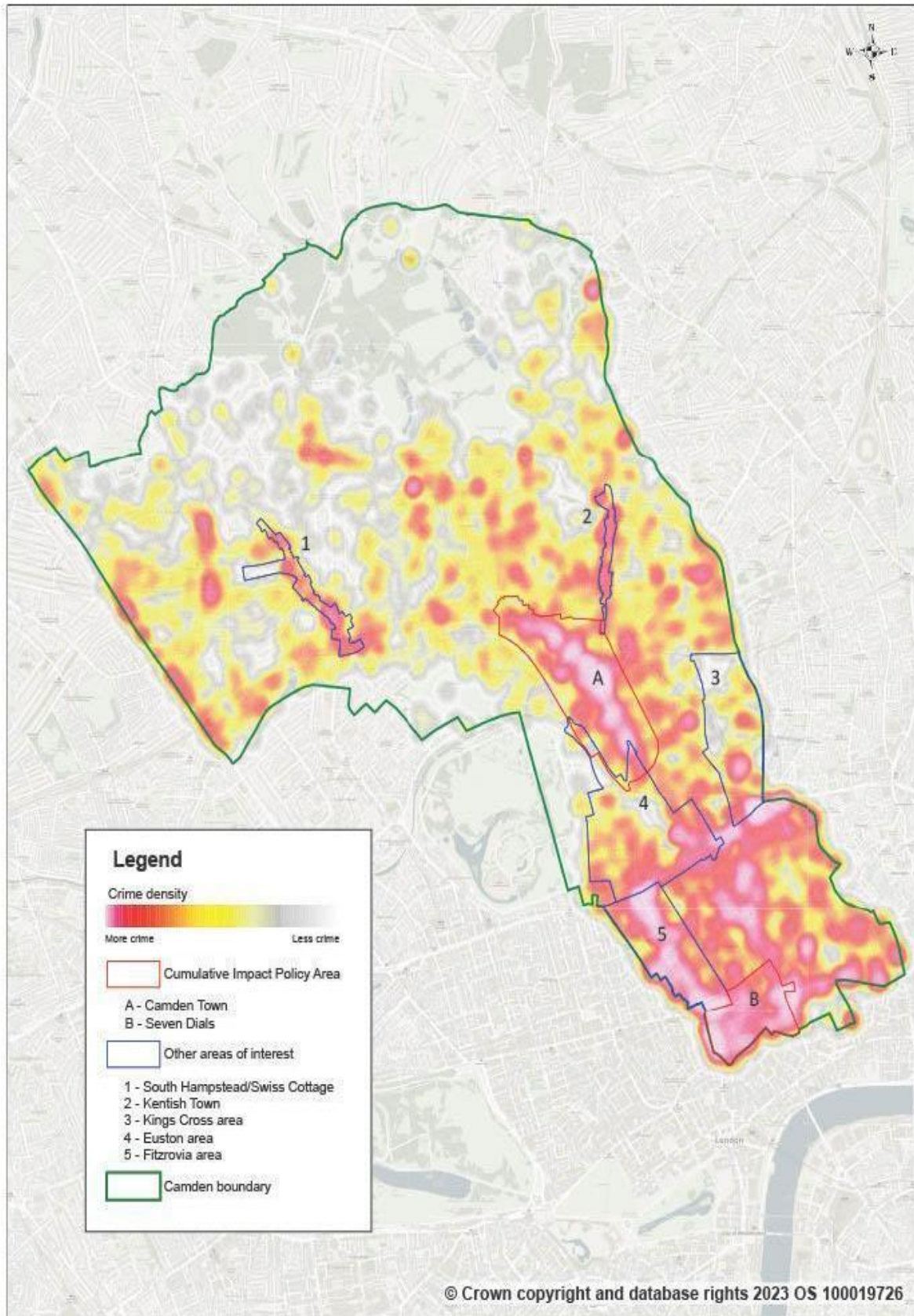
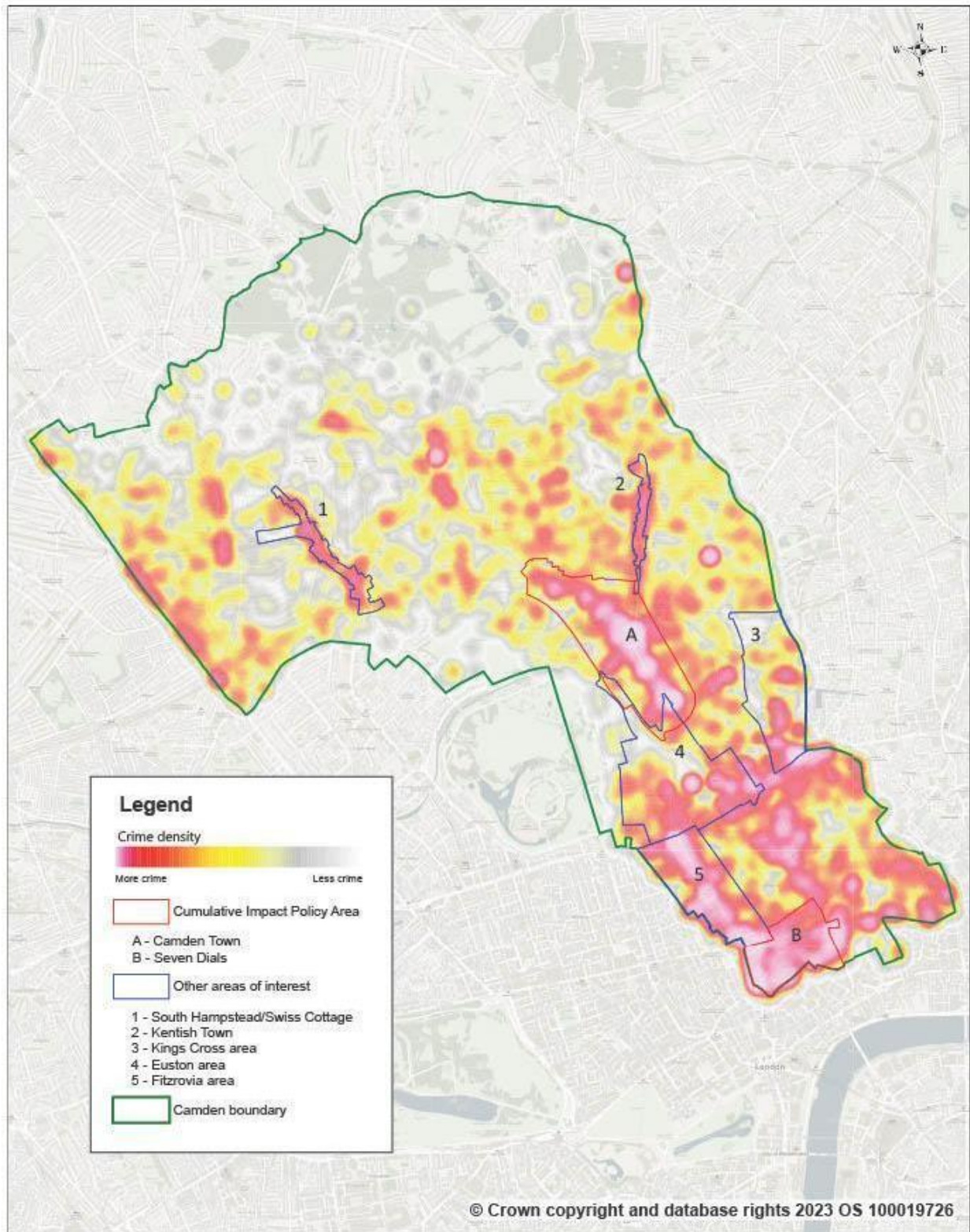


Figure 8. Density of ALL relevant night-time crime (18:00-05:59) in Camden, 1st September 2022 to 31st August 2023



3.2.5. Violence offences

3.2.5.1. The following tables, charts and maps set out the key changes over time for *violent crime* types (between 18:00 and 05:59) that *may* be associated with the clustering of licensed premises, their customers and the operation of the NTE.

Figure 9. All relevant night-time (18:00 – 05:59) VIOLENCE offences in Camden, 2019/20 and 2022/23

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Whole borough					
Violence without injury	1745	-	1769	-	+1.4%
Violence with injury	1087	-	1115	-	+2.6%
Homicide	4	-	0	-	Reduction
Robbery	887	-	679	-	-23.4%
Total	3723	-	3563	-	-4.3%
Camden Town					
Violence without injury	265	15.2%	224	12.7%	-15.5%
Violence with injury	234	21.5%	237	21.3%	+1.2%
Homicide	1	25%	0	-	Reduction
Robbery	88	9.9%	143	21.1%	+62.5%
Total	588	15.8%	604	17.0%	+2.7%
Seven Dials					
Violence without injury	83	4.8%	75	4.2%	-9.6%
Violence with injury	62	5.7%	67	6.0%	+8.1%
Homicide	0	0.0%	0	-	-
Robbery	85	9.6%	64	9.4%	-24.7%
Total	230	6.2%	206	5.8%	-10.4%
Fitzrovia					
Violence without injury	101	5.8%	75	4.2%	-25.7%
Violence with injury	58	5.3%	44	3.9%	-24.1%
Homicide	0	0.0%	0	-	-
Robbery	90	10.1%	78	11.5%	-13.3%
Total	249	6.7%	197	5.5%	-20.9%
KX / St Pancras/ Euston					
Violence without injury	117	6.7%	157	8.9%	+34.2%
Violence with injury	74	6.8%	92	8.3%	+24.3%
Homicide	1	25.0%	0	-	Reduction
Robbery	60	6.8%	53	7.8%	-11.7%
Total	252	6.8%	302	8.5%	+19.8%
Hampstead/S. Cottage					
Violence without injury	28	1.6%	39	2.2%	+39.3%
Violence with injury	13	1.2%	16	1.4%	+23.1%
Homicide	0	0.0%	0	-	-
Robbery	15	1.7%	10	1.5%	-33.3%
Total	56	1.5%	65	1.8%	+16.1%

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Kentish Town					
Violence without injury	29	1.7%	25	1.4%	-13.8%
Violence with injury	23	2.1%	24	2.2%	+4.3%
Homicide	0	0.0%	0	-	-
Robbery	10	1.1%	8	1.2%	-20%
Total	62	1.2%	57	1.6%	-8.1%
Kilburn					
Violence without injury	35	2.0%	37	2.1%	+5.7%
Violence with injury	16	1.5%	25	2.2%	+56.2%
Homicide	0	0.0%	0	-	-
Robbery	5	1.6%	11	1.5%	+120.0%
Total	56	1.5%	73	2.0%	+30.4%

Figure 10. All relevant night-time (18:00-05:59) VIOLENCE offences in Camden 2019/20

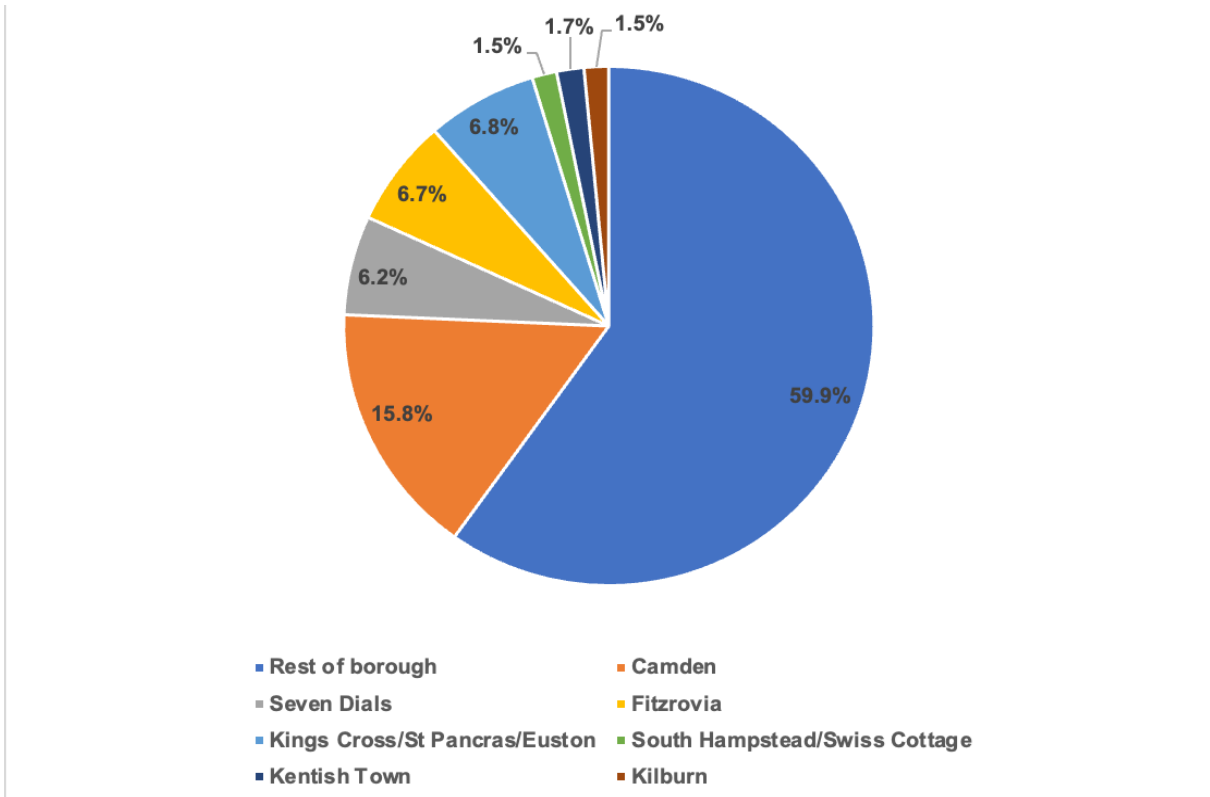


Figure 11. All relevant night-time (18:00-05:59) VIOLENCE offences in London Borough of Camden 2022/23

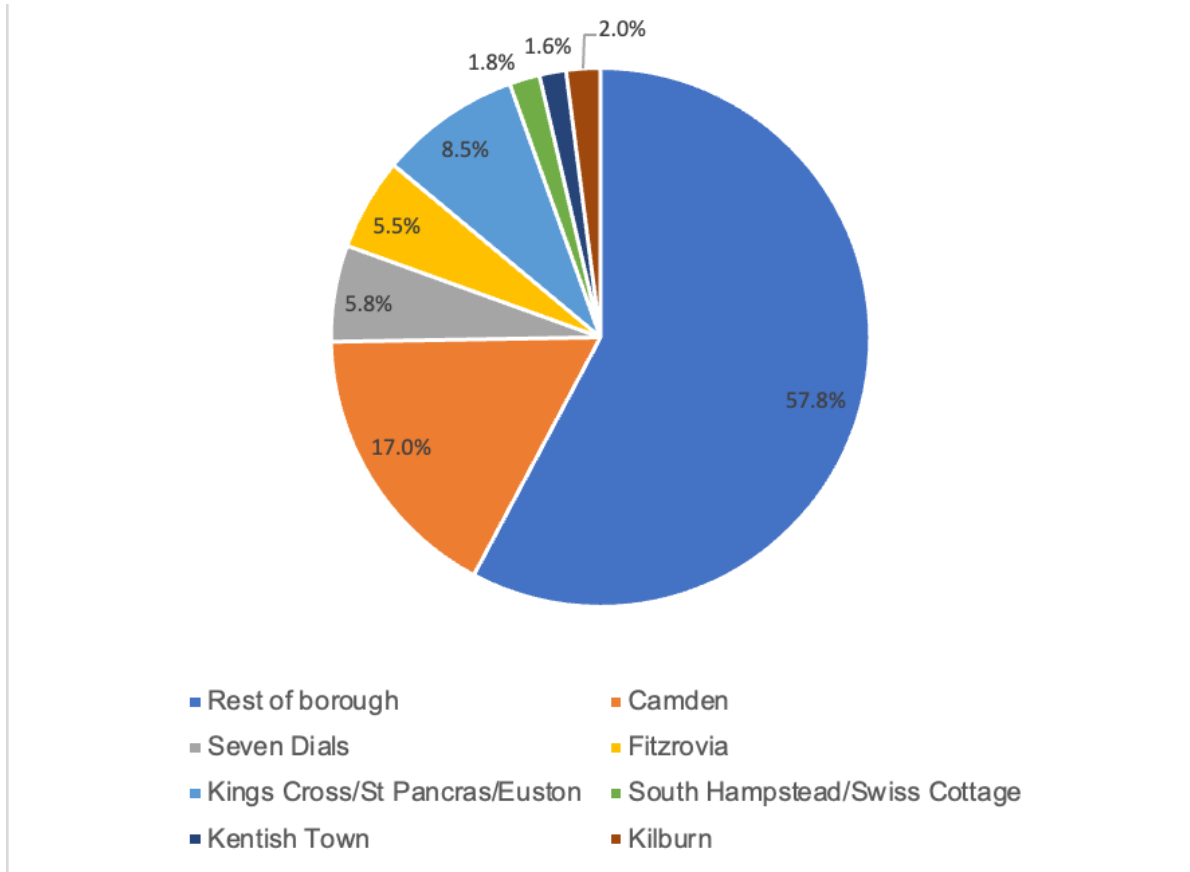
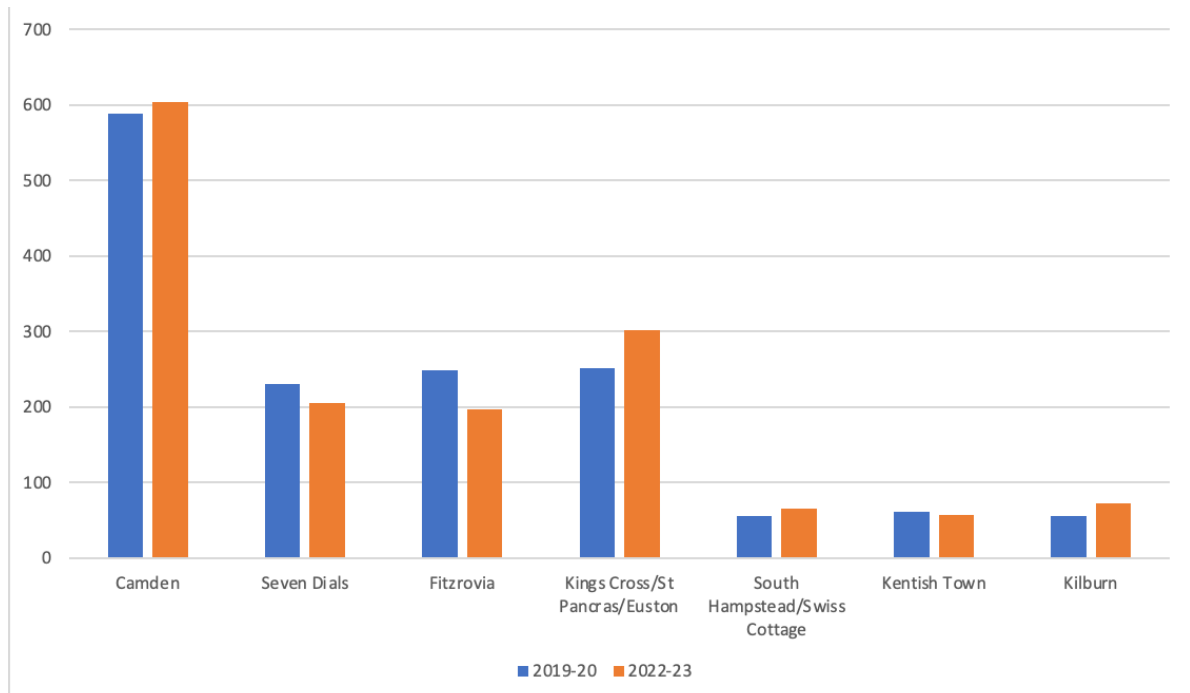


Figure 12. Comparison of all relevant night-time VIOLENCE offences (18:00-05:59) 2019/20 vs 2022/23



- 3.2.5.2. Nationally, the police recorded 2.1 million offences of *violence against the person* in the year ending March 2023 ([ONS 2023](#)). This was a +20% rise compared with the year ending March 2020 (1.8 million offences). The LB Camden saw a -4.3% decrease in *violent offences* between similar time periods.
- 3.2.5.3. Across the UK, in the year ending March 2023 *violence with injury* was +6.0% higher (573,791 offences) than levels recorded in the year ending March 2020 (540,870 offences). Across the LB Camden, *violence with injury* increased by +2.6% (n.28), albeit this is less than half the national percentage increase between these periods.
- 3.2.5.4. In addition, in the year ending March 2023 *violence without injury* increased nationally by +14.0% to 828,673 offences compared with the year ending March 2020 (728,265 offences). *Violence without injury* increased by +1.4% (n.24) across the borough in 2022/23, just a tenth of the national increase of +14.0% for the period.
- 3.2.5.5. Between 2020 and 2023 in Camden Town *violence without injury* fell by -15.5% (n. 41), bucking the national trend. *Violence with injury* increased by +1.2% (although this represents just 3 additional crimes), which is significantly below national trends.
- 3.2.5.6. Between 2020 and 2023 Seven Dials has seen a decrease of -9.6% for *violence without injury*, however this equates to just 8 fewer crimes between the two periods. *Violence with injury* increased by +8.1% over this period, although this increase represents only 5 more crimes than in 2019/2020.
- 3.2.5.7. Reported incidents of *robbery* have fallen significantly by -23.4% across the borough (n.208) between 2020 and 2023. Most of the locations of focus for this report experienced a significant reduction in robbery offences between the two 12-month periods of comparison.
- 3.2.5.8. Camden Town, however, experienced a +62.5% (n.55) increase in *robbery* offences in 2022/2023 compared with 2019/2020. Kilburn saw a +120.0% increase in *robbery*. However, these figures represent an increase of only 6 actual offences because the total is already very low.

Figure 13. Density of all relevant night-time VIOLENCE, ROBBERY AND PUBLIC ORDER offences (18:00-05:59) in Camden, 1st April 2019 to 31st March 2020

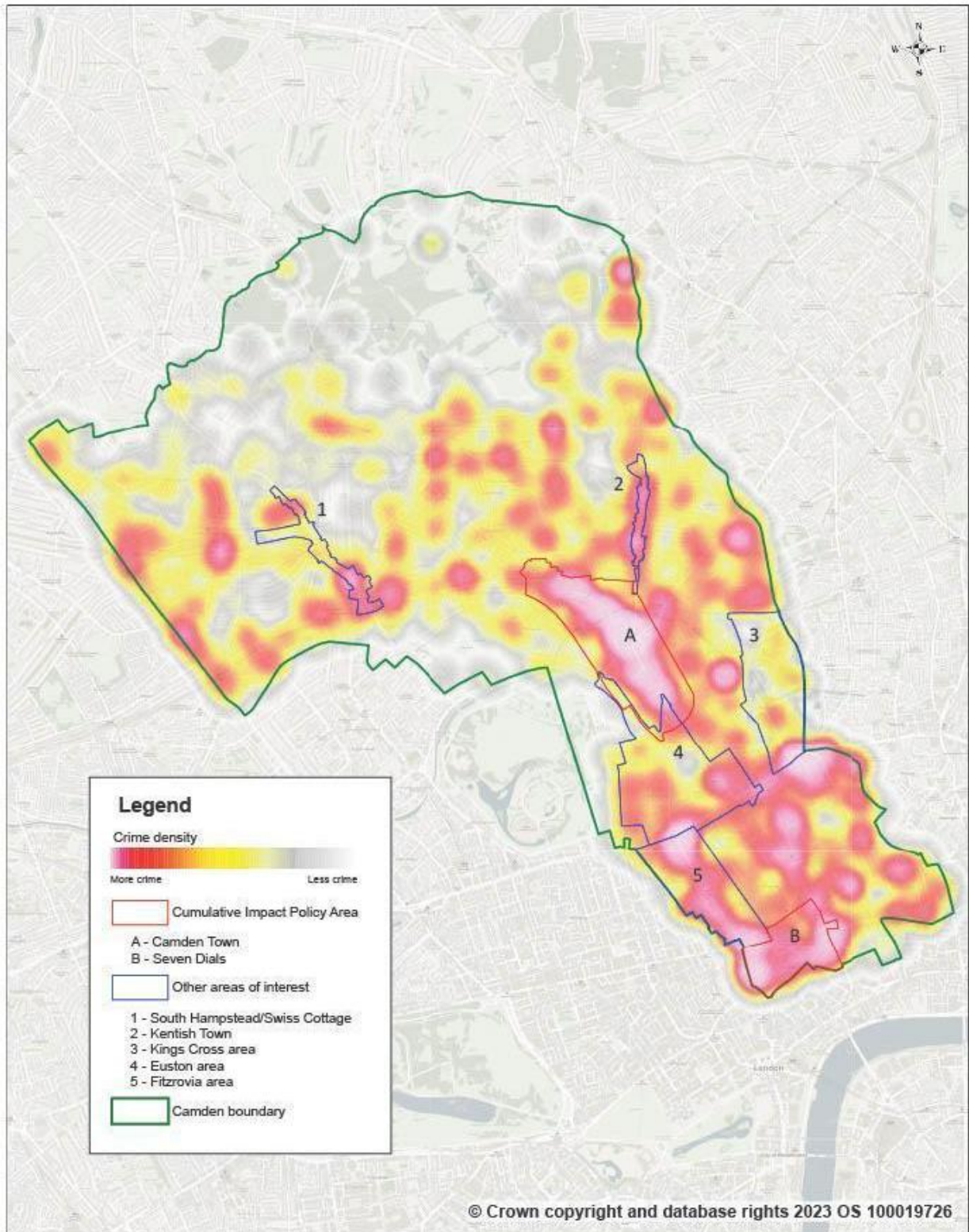
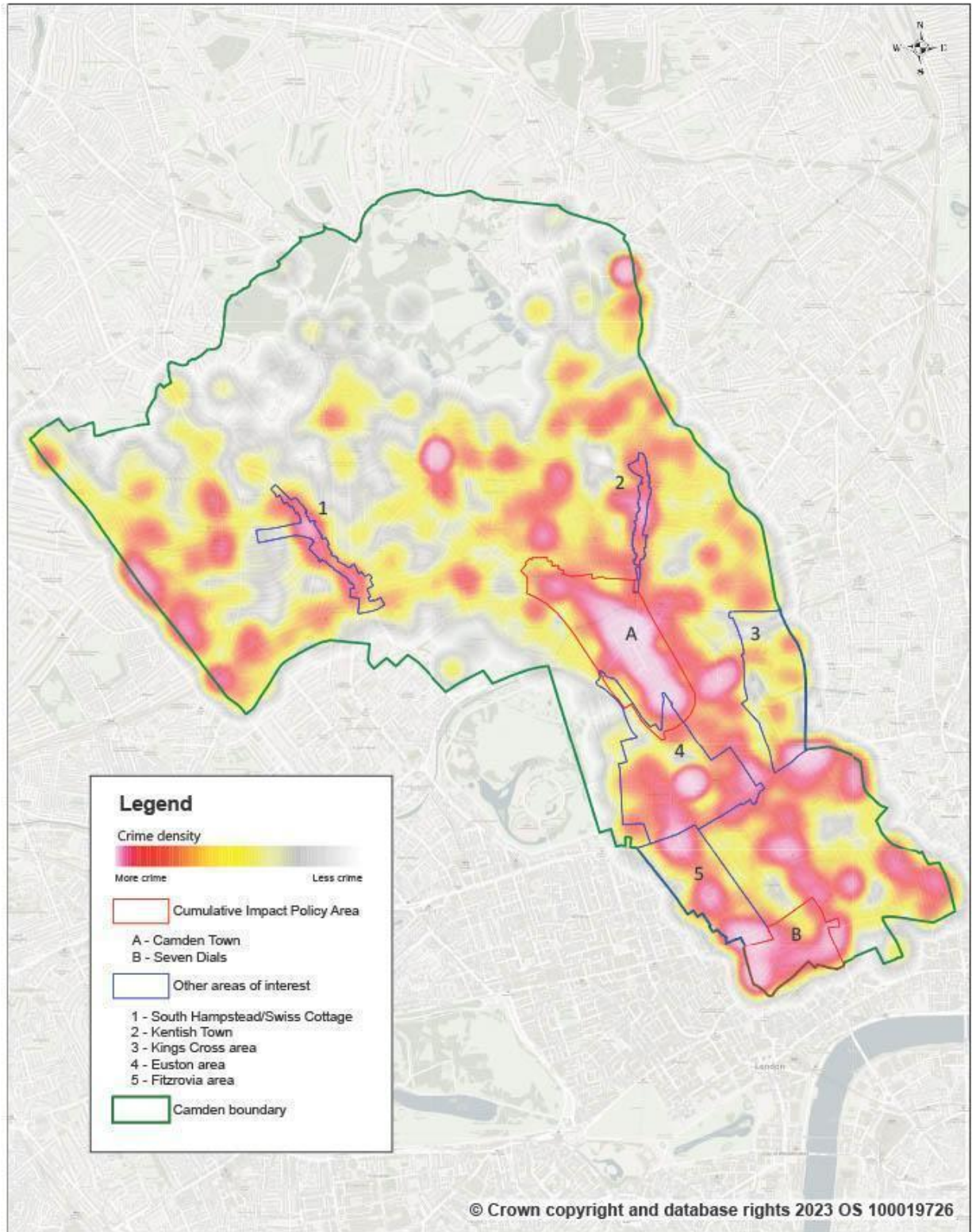


Figure 14. Density of all relevant VIOLENCE, ROBBERY AND PUBLIC ORDER offences (18:00-05:59) in Camden, 1st September 2022 to 31st August 2023



3.2.6. Sexual offences

- 3.2.6.1. Due to the sensitive nature of this offence type, specific location markers are not provided by the MPS for *sexual offences*. However, the ward name was provided and the ward that most closely represented the areas of concern in this report were chosen to obtain a very approximate picture of any change in the number of *sexual offences* in the areas between the two periods.
- 3.2.6.2. The analysis in the table below therefore only includes a comparison between the percentage increase/decrease in the number of *sexual offences* seen in the whole borough against that of those wards selected to represent the CIP areas and areas of interest.

Figure 15. All relevant night-time (18:00 – 05:59) SEXUAL offences in Camden, 2019/20 vs 2022/23

% change 2019/20 vs 2022/23							
Whole borough	Camden Town	Seven Dials	Fitzrovia	KX / St Pancras/ Euston	H'stead/ Swiss Cottage	Kentish Town	Kilburn
+23.7% (n.78)	+80.0% (n.24)	-27.8% (n.10)	+38.2% (n.13)	+25.0% (n.6)	+20.0% (n.1)	+29.2% (n.7)	-9.1% (n.1)

- 3.2.6.3. In the year ending March 2023, there were 195,315 *sexual offences* recorded nationally by the police, which was a +20% increase from the year ending March 2020 ([ONS, 2023](#)).
- 3.2.6.4. In 2023 the London Borough of Camden, there were +23.7% more *sexual offences* recorded by the police in the 2022/23 period than in 2019/20.
- 3.2.6.5. The three areas relevant to this report that had significantly higher increases than the borough-wide increase were: Camden Town (+80.0% increase, equating to 24 additional offences in the ward used as an indicator for this area), Fitzrovia (+38.2%, 13 offences) and Kentish Town (+29.2%, 7 offences).
- 3.2.6.6. MPS or Camden Council internal analysis of *sexual offences* in the CIP areas and areas of interest would enable specific location markers to be used on the data, providing more detailed insights.

3.2.7. Theft

3.2.7.1. The following tables, charts and maps set out the key changes over time for all those *theft* types (between 18:00hrs and 05:59hrs) that are commonly associated with the clustering of licensed premises, their customers and the operation of the NTE.

Figure 16. All relevant night-time (18:00 – 05:59) THEFT in Camden, 2019/20 and 2022/23

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Whole borough					
Other theft	3405	-	3556	-	+4.4%
Theft from person	2182	-	2541	-	+16.5%
Total	5587	-	6097	-	+9.1%
Camden Town					
Other theft	409	12.0%	413	11.6%	+1.0%
Theft from person	220	10.1%	489	19.2%	+122.3%
Total	629	11.3%	902	14.8%	+43.4%
Seven Dials					
Other theft	423	12.4%	595	16.7%	+40.7%
Theft from person	319	14.6%	495	34.9%	+55.2%
Total	742	13.3%	1090	36.5%	+46.9%
Fitzrovia					
Other theft	647	19.0%	650	18.3%	+0.5%
Theft from person	396	18.1%	394	15.5%	-0.5%
Total	1043	18.7%	1044	17.1%	+0.1%
KX/St Pancras/ Euston					
Other theft	316	9.2%	213	6.0%	-32.6%
Theft from person	171	7.8%	203	8.0%	+18.7%
Total	487	8.7%	416	6.8%	-14.6%
Hampstead/S. Cottage					
Other theft	54	1.6%	34	1.0%	-37.0%
Theft from person	17	0.8%	49	1.9%	+188.2%
Total	71	1.5%	83	1.4%	+16.9%
Kentish Town					
Other theft	21	0.6%	34	1.0%	+61.9%
Theft from person	21	1.0%	24	0.9%	+14.3%
Total	42	0.8%	58	1.0%	+38.1%
Kilburn					
Other theft	37	1.1%	35	1.0%	-5.4%
Theft from person	11	0.5%	19	0.7%	+72.7%
Total	48	0.9%	54	0.9%	+12.5%

Figure 17. All relevant night-time (18:00-05:59) THEFT offences in Camden 2019/20

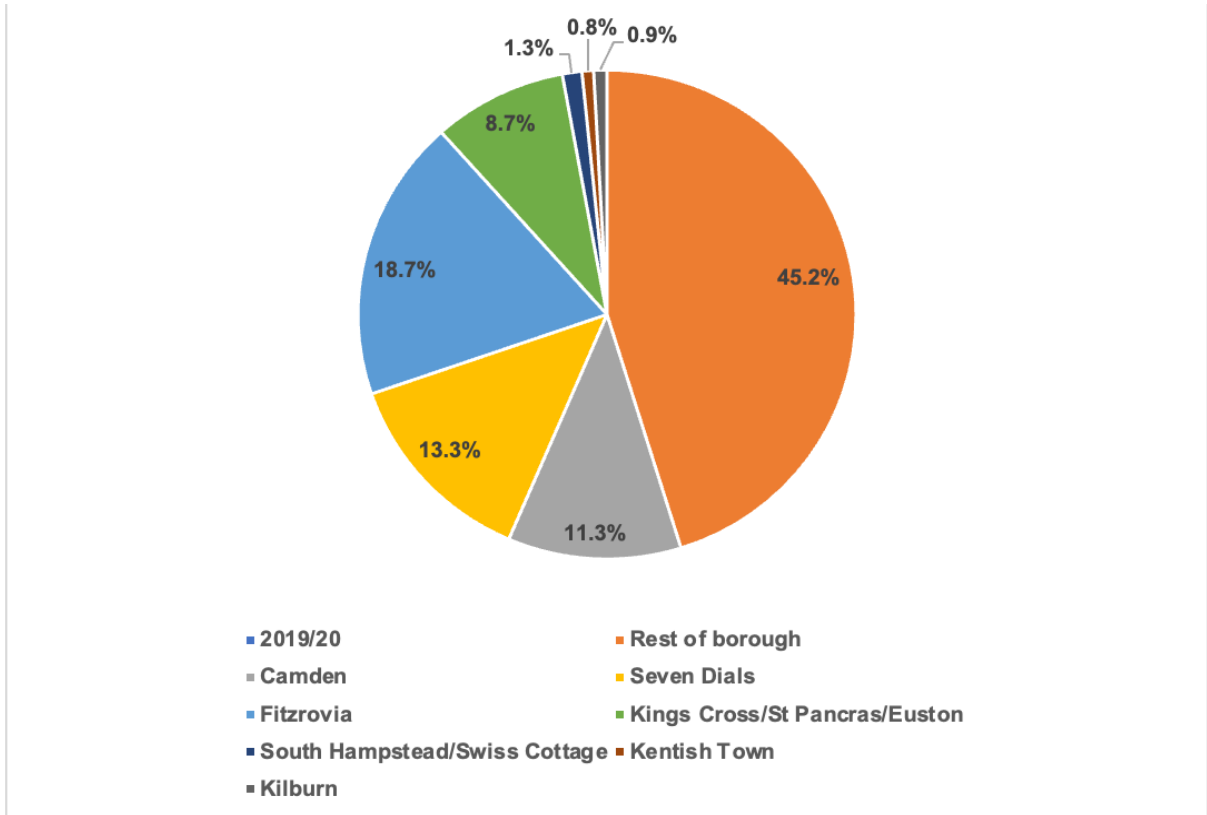


Figure 18. All relevant night-time (18:00-05:59) THEFT offences in Camden 2022/23

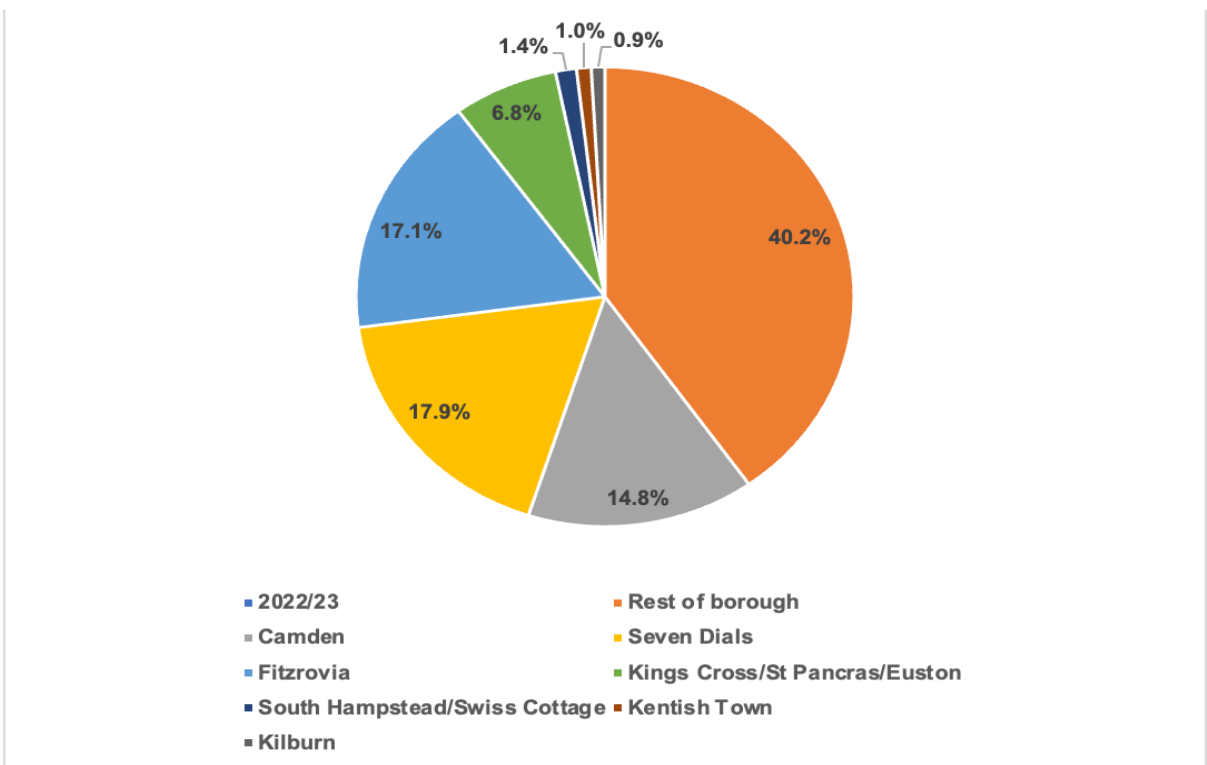
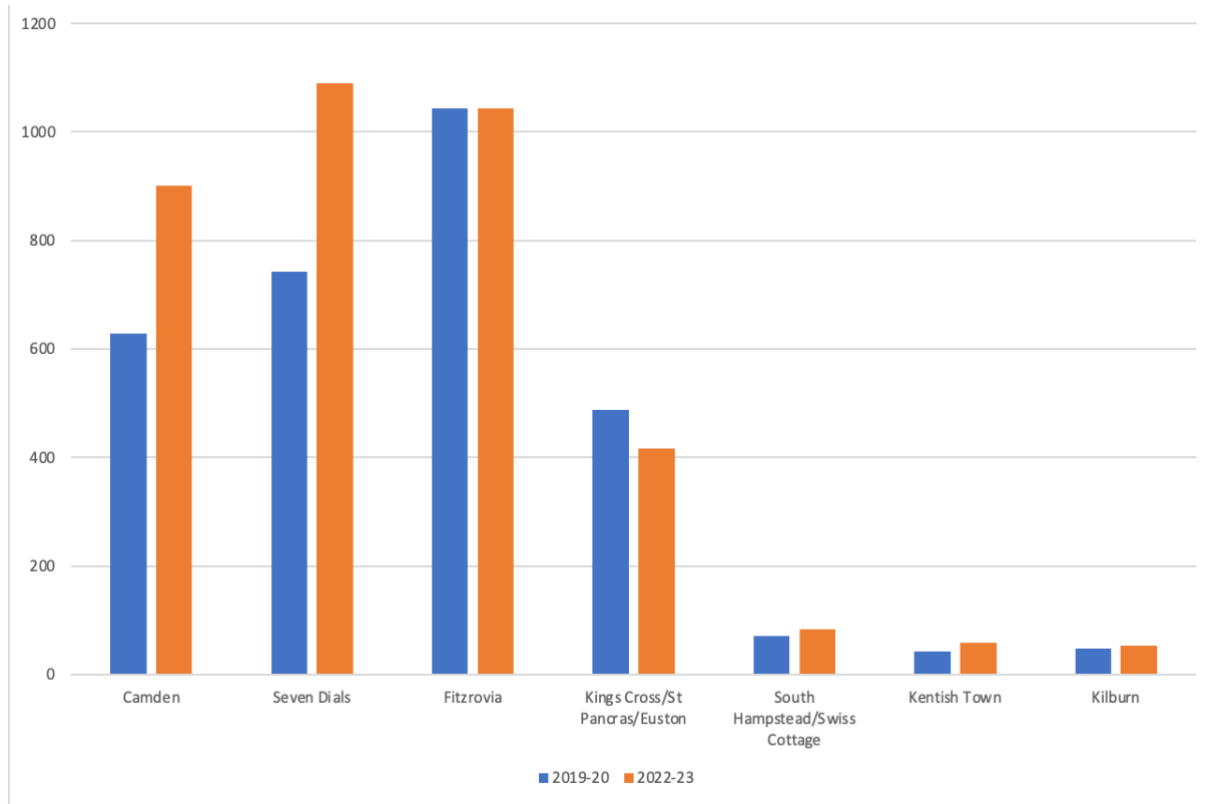


Figure 19. Comparison of all relevant night-time THEFT offences (18:00-05:59) 2019/20 vs 2022/23



- 3.2.7.2. Nationally there were 2.7 million incidents of *theft* estimated by the Crime Survey for England and Wales (CSEW) for the year ending March 2023. This was a -20% decrease compared with the year ending March 2020 (3.3 million offences). This large fall was seen across most sub-categories, including *theft from the person* (-33%) and *other theft of personal property* (-31%). [ONS Yr End 2023](#)
- 3.2.7.3. The whole borough recorded +103% more *other theft* offences than the London average for 2023, and +193% more *theft from the person* offences ([Crimerate, 2023](#)). *Theft from person* and *other theft* are the two offence types driving the increase in police recorded NTE crime, with +16.5% (n. 359) and +4.4% (n.151) increases respectively.
- 3.2.7.4. Camden Town and Seven Dials both saw significant increases in *theft from person* offences between the years analysed, with increases of +122.3% (n.269) and +55.2% (n.176) respectively. Seven Dials also saw a significant increase in *other theft* offences (+40.7%, n. 172). Camden Town saw a negligible increase of +1.0% (n.4) in this offence.
- 3.2.7.5. Fitzrovia experienced a greater proportion of the borough's *theft* offences than Camden Town in both years analysed, however the volume of crime between the two years was broadly similar.

- 3.2.7.6. King's Cross/St Pancras/Euston saw an overall decrease in *theft* offences of -14.6% (n.71), however this included a reduction in *other theft* offences (-32.6%, n. 103) but an increase in *theft from the person* offences (+18.7%, n.32).
- 3.2.7.7. Hampstead / Swiss Cottage also saw an increase in *theft from the person* offences (+188.2%, n.32) and a reduction in *other theft* (-37.0%, n.20).
- 3.2.7.8. The volume of offences recorded by the MPS in Kilburn and Kentish Town were relatively low, preventing meaningful analysis of this offence type.

Figure 20. Density of relevant night-time THEFT offences (18:00-05:59) in Camden, 1st April 2019 to 31st March 2020

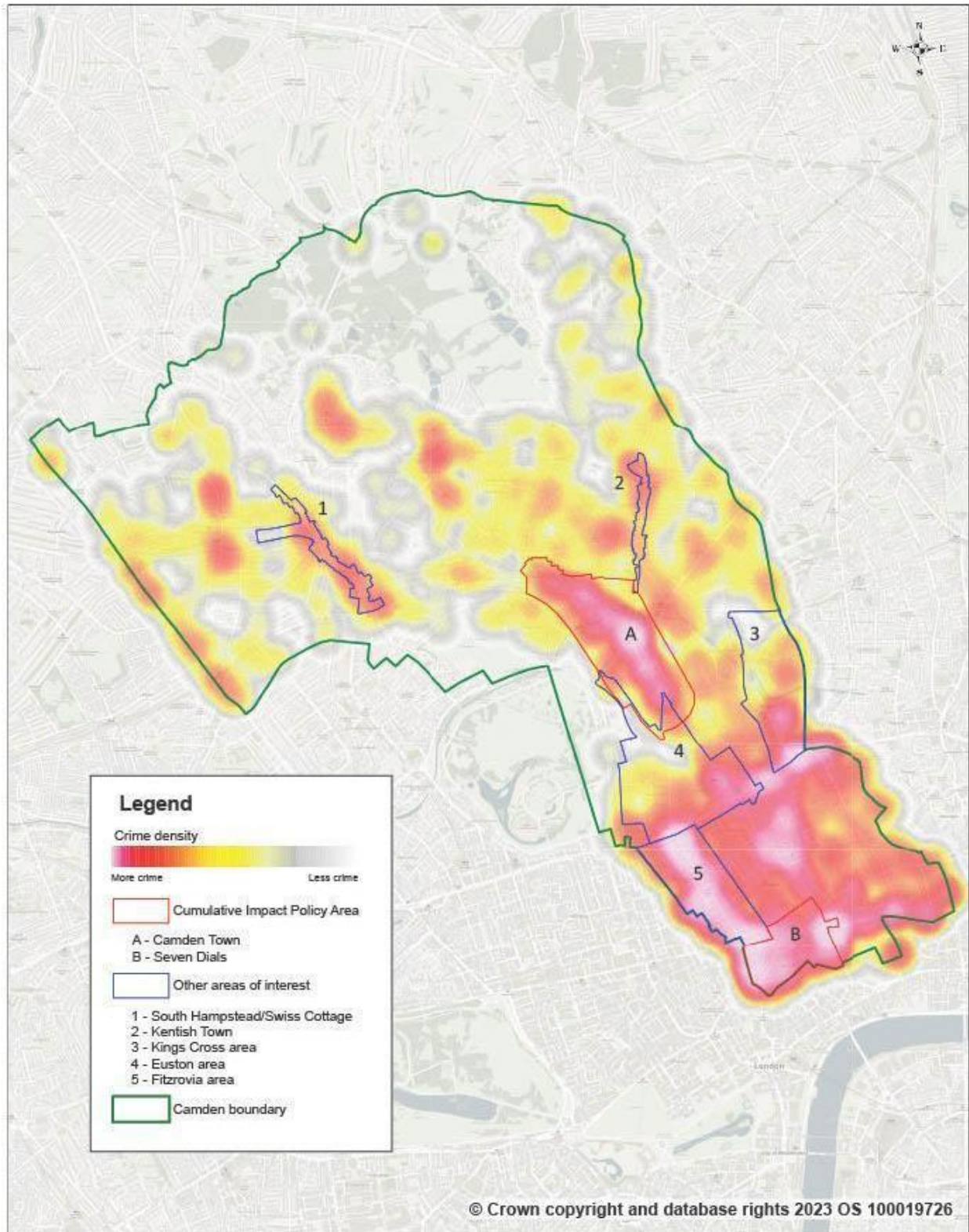
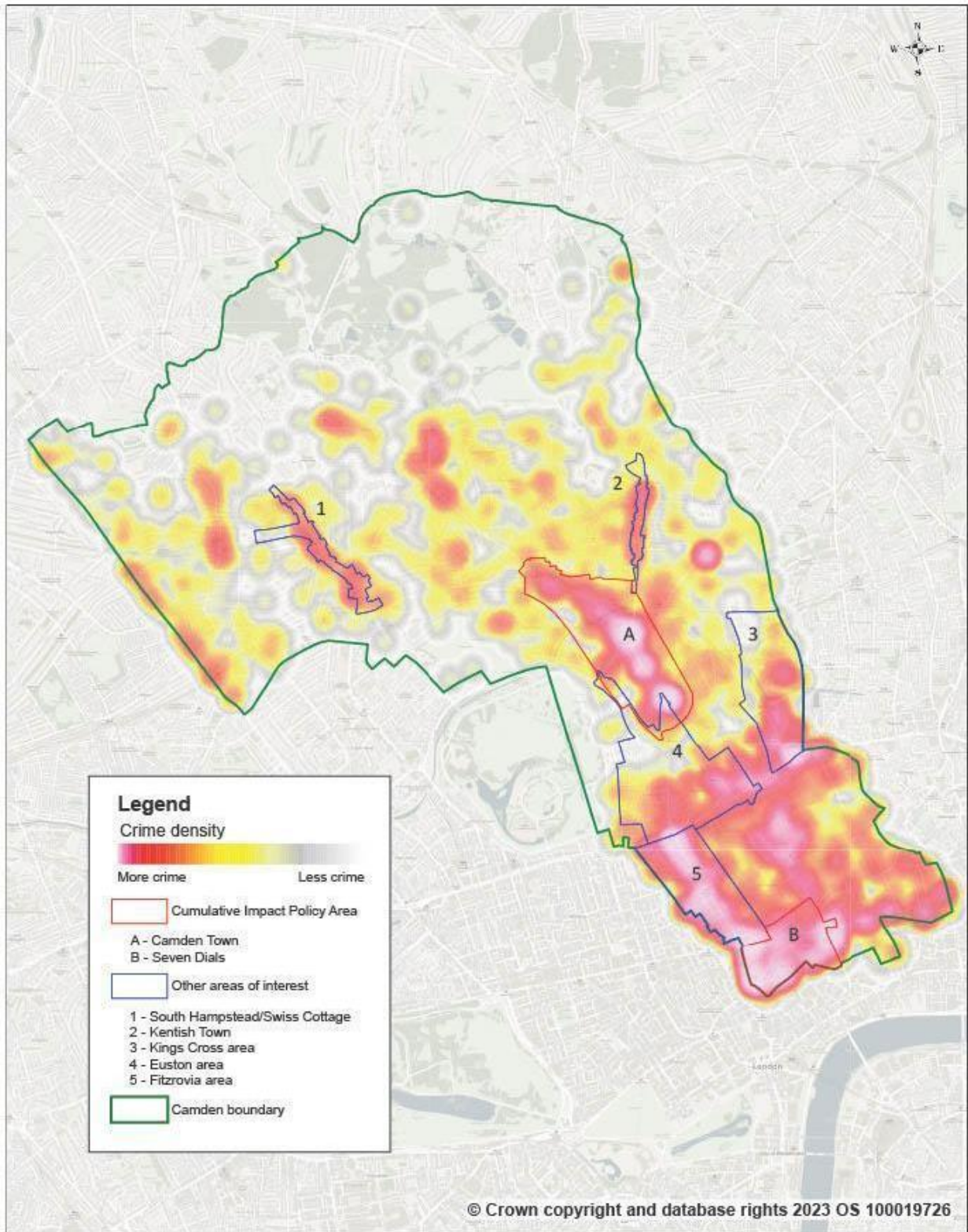


Figure 21. Density of relevant night-time THEFT offences (18:00-05:59) in Camden, 1st September 2022 to 31st August 2023



3.2.8. Criminal damage

3.2.8.1. The following tables, charts and hotspot maps set out the key changes over time for those relevant *criminal damage* types (between 18:00hrs and 05:59hrs) that are commonly associated with the clustering of licensed premises, their customers and the operation of the NTE.

Figure 22. All relevant night-time (18:00–05:59) CRIMINAL DAMAGE offences in Camden, 2019/20 and 2022/23

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Whole borough	754	-	811	-	+7.6%
Camden Town	84	11.1%	86	10.6%	+2.4%
Seven Dials	42	5.6%	51	6.3%	+21.4%
Fitzrovia	48	6.4%	3	5.3%	-10.4%
KX / St Pancras/ Euston	44	5.8%	58	7.2%	+31.8%
Hampstead/S. Cottage	14	1.9%	15	1.8%	+7.1%
Kentish Town	10	1.3%	8	1.0%	-20.0%
Kilburn	7	0.9%	18	2.2%	+157.1%

3.2.8.2. There were +7.6% (n. 57) more NTE *criminal damage* offences recorded across the borough in 2022/23 compared with 2019/20.

3.2.8.3. The largest increases by volume *criminal damage* offences were seen in Kings Cross/St Pancras/Euston (n.14, +31.8% increase), Kilburn (n. 11, +157.1% increase) and Seven Dials (n. 9, +21.4% increase).

3.2.8.4. In all areas analysed, only two experienced more than one NTE *criminal damage* offence per week on average; Camden Town (1.7 per week on average) and King’s Cross/St Pancras/Euston (1.2).

Figure 23. Density of relevant night-time CRIMINAL DAMAGE offences (18:00-05:59) in Camden, 1st April 2019 to 31st March 2020

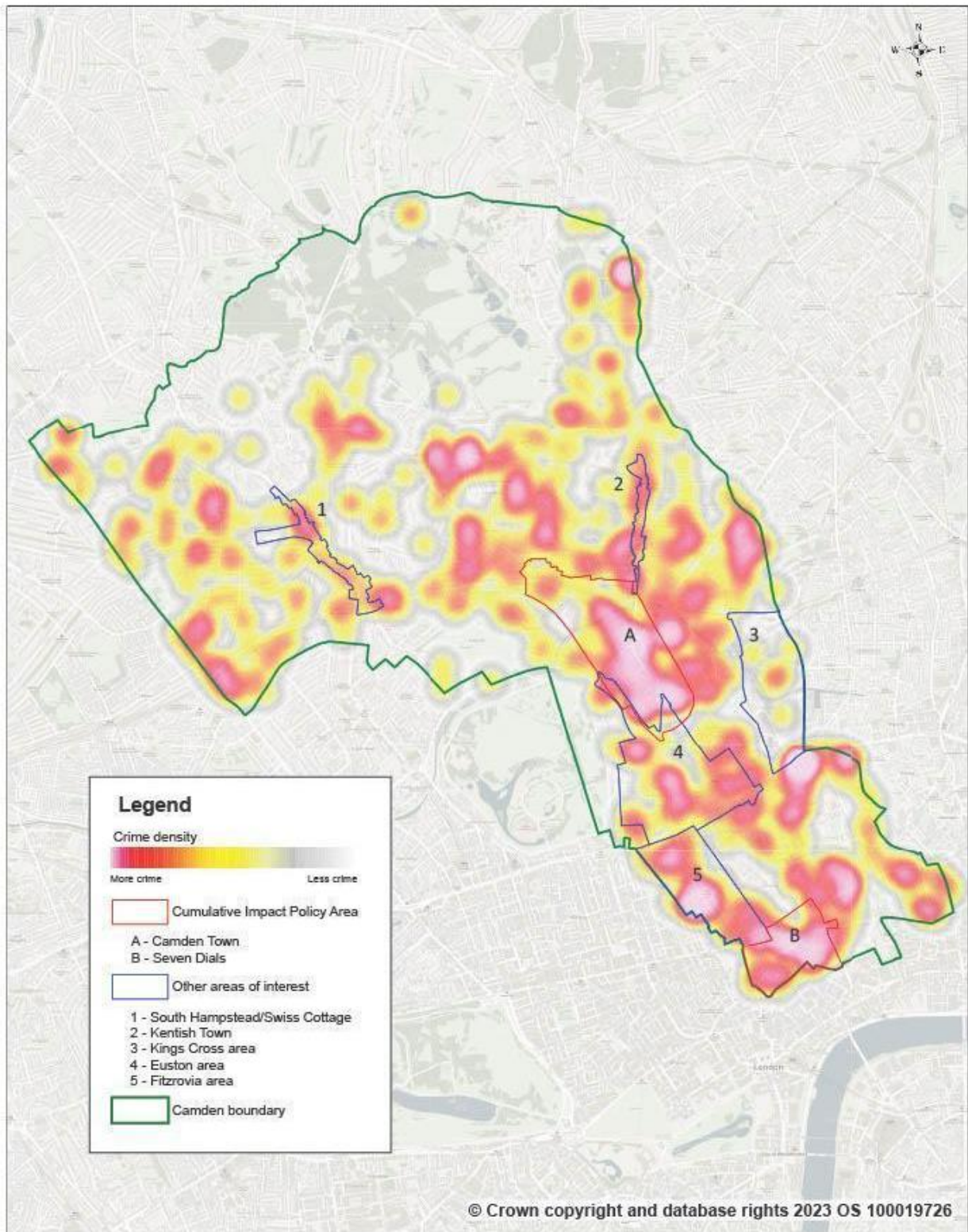
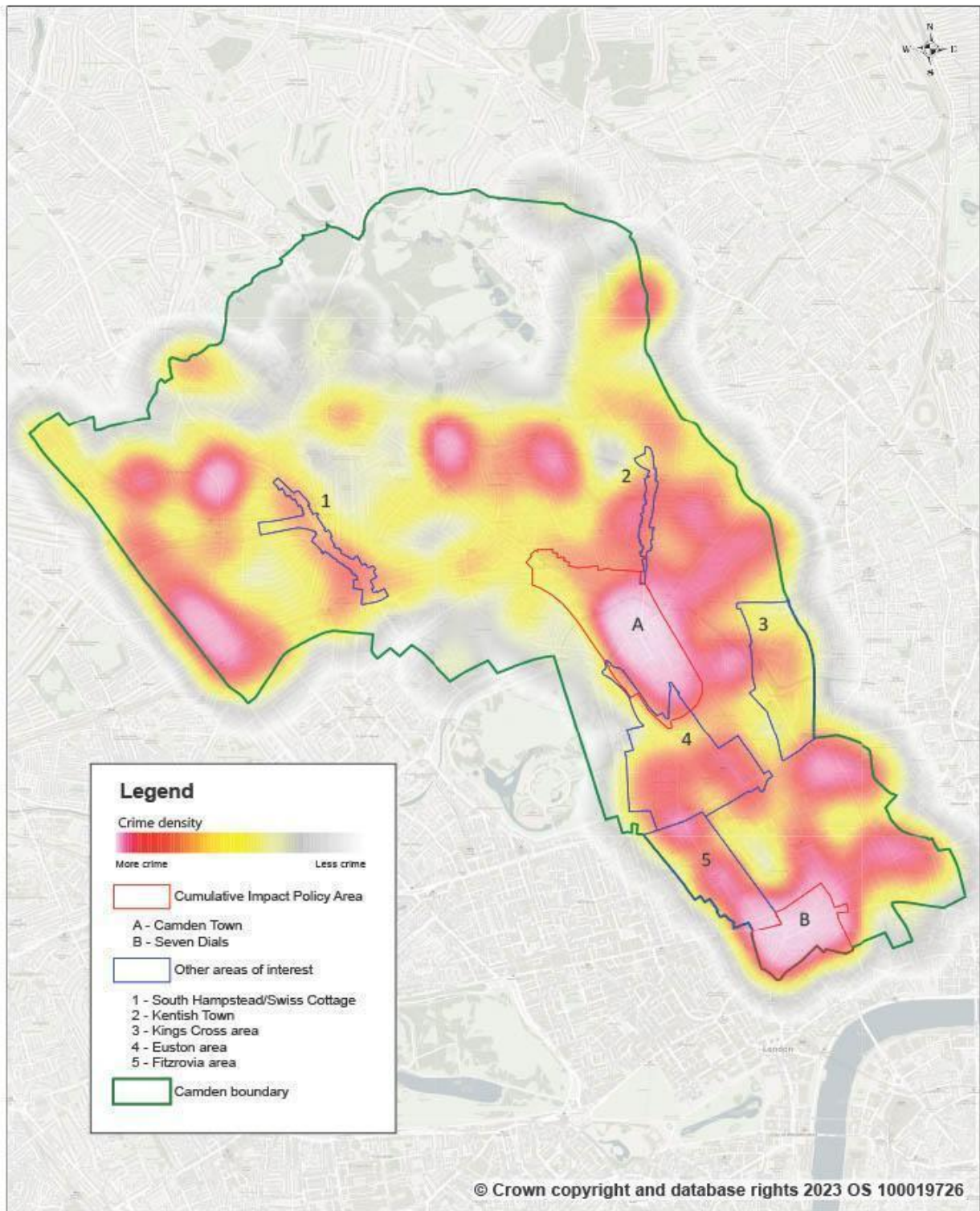


Figure 24. Density of relevant CRIMINAL DAMAGE offences (18:00-05:59) in Camden, 1st September 2022 to 31st August 2023



3.2.9. Public fear, alarm or distress

3.2.9.1. The following tables, charts and hotspot maps set out the key changes over time for all those relevant *public fear, alarm or distress* crime types (between 18:00hrs and 05:59hrs) that may be associated with the clustering of licensed premises, their customers and the operation of the NTE.

Figure 25. All relevant night-time (18:00–05:59) PUBLIC FEAR, ALARM OR DISTRESS offences in Camden, 2019/20 and 2022/23

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Whole borough	410	-	490	-	+19.5%
Camden Town	73	17.8%	60	12.2%	-17.8%
Seven Dials	23	5.6%	32	6.5%	+39.1%
Fitzrovia	32	7.8%	44	9.0%	+37.5%
KX / St Pancras/ Euston	25	6.1%	34	6.9%	+36.0%
Hampstead/S. Cottage	2	0.5%	12	2.4%	+500.0%
Kentish Town	4	1.0%	13	2.7%	+225.0%
Kilburn	20	4.9%	11	2.2%	-45.0%

3.2.9.2. There were +19.5% (n. 80) more night-time *public fear, alarm or distress* offences recorded across the borough in 2022/23 compared with 2019/20.

3.2.9.3. The biggest increase of *public fear, alarm or distress* by volume was seen in Fitzrovia (n.12, +37.5% increase). Seven Dials, King’s Cross/St Pancras/Euston and Kentish Town each saw an increase of 9 offences, equating to an increase of +39.1%, +36.0% and +225.0% respectively. These appear to be large increases, but it is difficult to draw statistically sound conclusions from such a small volume of offences.

3.2.9.4. In all areas analysed, only Camden Town experienced more than one NTE Public Fear, Alarm or Distress offence per week on average (1.2 offences per week on average).

3.2.10. Drugs offences and drug-related ASB

3.2.10.1. The following tables, charts and hotspot maps set out the key changes over time for all those *criminal drugs offences* and *ASB drug-related types* (between 18:00hrs and 05:59hrs) that are commonly associated with the clustering of licensed premises, their customers and the operation of the NTE.

Figure 26. All relevant night-time (18:00–05:59) DRUG OFFENCES AND DRUG-RELATED ASB in Camden, 2019/20 and 2022/23

	Incidents 2019/ 2020	% whole borough incidents 2019/ 2020	Incidents 2022/ 2023	% whole borough incidents 2022/ 2023	% change 19/20 vs. 22/23
Whole borough					
Possession of drugs	830	-	368	-	-55.7%
Drug trafficking	55	-	170	-	+209.1%
ASB “drugs offence”	98	-	50	-	-50.0%
ASB “drug related”	302	-	250	-	-17.2%
Total	1285	-	838	-	-34.8%
Camden Town					
Possession of drugs	255	30.7%	86	23.4%	-66.3%
Drug trafficking	8	1.0%	25	14.7%	+212.5%
ASB “drugs offence”	12	12.2%	5	10.0%	-58.3%
ASB “drug related”	49	16.2%	32	12.8%	-34.7%
Total	324	25.2%	148	17.7%	-54.3%
Seven Dials					
Possession of drugs	41	4.9%	21	5.7%	-48.8%
Drug trafficking	15	27.2%	2	1.2%	-86.7%
ASB “drugs offence”	3	3.1%	12	24%	+300.0%
ASB “drug related”	28	1.28%	17	6.8%	-39.3%
Total	87	6.8%	52	6.2%	-40.2%
Fitzrovia					
Possession of drugs	12	1.4%	14	3.8%	-16.7%
Drug trafficking	0	0.0%	4	2.4%	Increase
ASB “drugs offence”	6	6.1%	2	4.0%	-66.7%
ASB “drug related”	7	2.3%	10	4.0%	+42.9%
Total	21	1.6%	30	3.6%	+42.9%
KX / St Pancras/ Euston					
Possession of drugs	69	8.3%	39	10.6%	-43.5%
Drug trafficking	3	5.4%	15	8.8%	+400.0%
ASB “drugs offence”	5	5.1%	6	12%	+20.0%
ASB “drug related”	30	9.9%	21	8.4%	-30.0%
Total	181	14.1%%	137	16.3%	-24.3%
Hampstead/S.Cottage					
Possession of drugs	13	1.6%	1	0.2%	-92.3%
Drug trafficking	2	3.6%	0	0.0%	Decrease
ASB “drugs offence”	0	0.0%	0	0.0%	-

	Incidents 2019/ 2020	% whole borough incidents 2019/ 2020	Incidents 2022/ 2023	% whole borough incidents 2022/ 2023	% change 19/20 vs. 22/23
ASB “drug related”	0	0.0%	1	0.4%	Increase
Total	22	1.7%	5	0.6%	-77.3%
Kentish Town					
Possession of drugs	12	1.4%	15	4.1%	+25.0%
Drug trafficking	1	1.8%	0	0.0%	Decrease
ASB “drugs offence”	0	0.0%	0	0.0%	-
ASB “drug related”	0	0.0%	0	0.0%	-
Total	13	1.0%	15	1.8%	-15.4%
Kilburn					
Possession of drugs	5	0.6%	2	0.4%	-60.0%
Drug trafficking	4	3.6%	0	0.0%	Reduction
ASB “drugs offence”	0	0.0%	0	0.0%	-
ASB “drug related”	1	0.3%	1	0.4%	-
Total	10	0.8%	5	0.6%	-50.0%

Figure 27. All relevant night-time (18:00-05:59) DRUG OFFENCES AND DRUG-RELATED ASB in Camden 2019/20

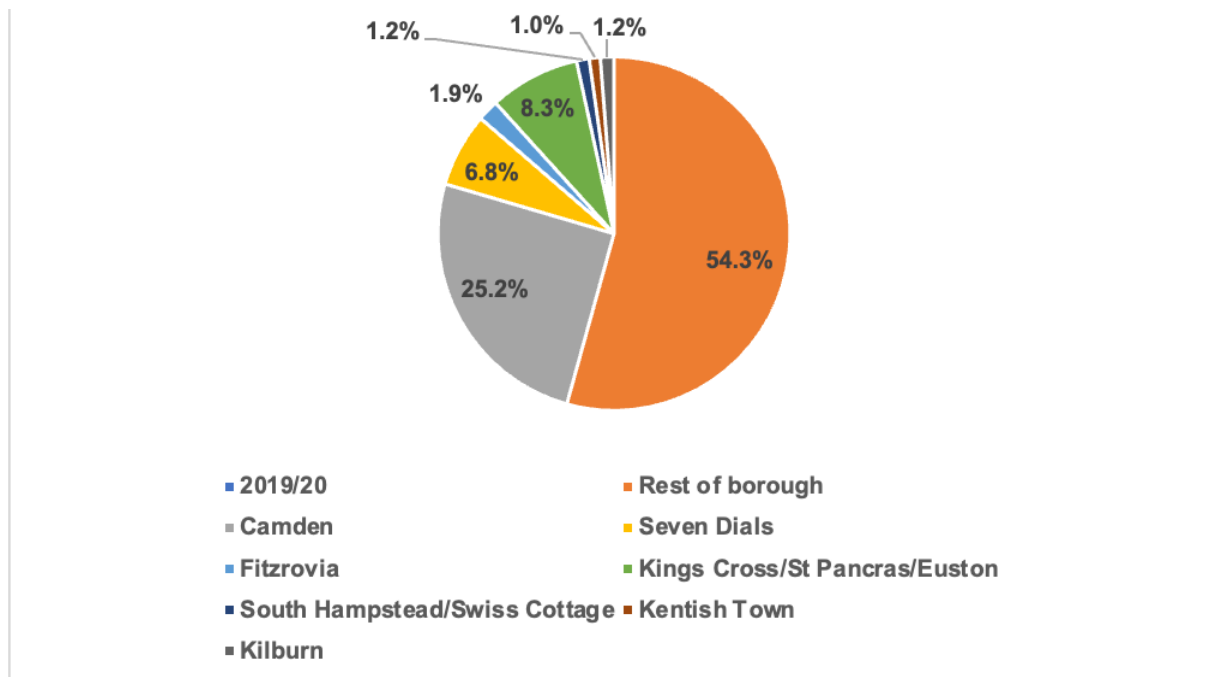


Figure 28. All relevant night-time (18:00-05:59) DRUG OFFENCES AND DRUG-RELATED ASB in Camden 2022/23

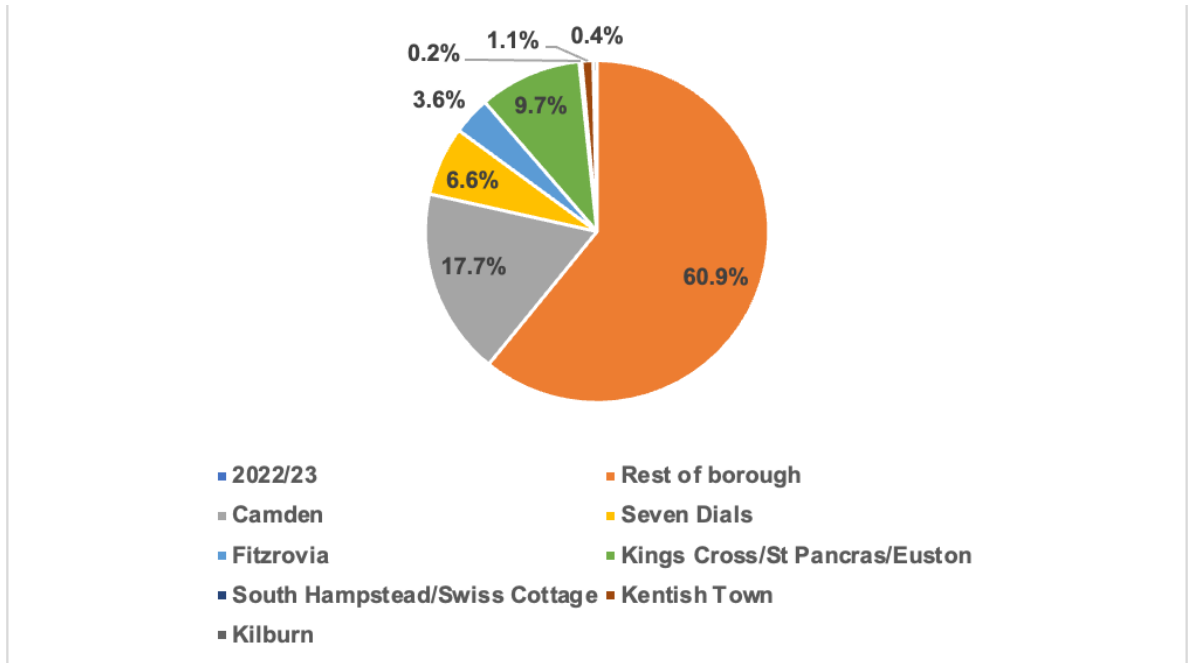
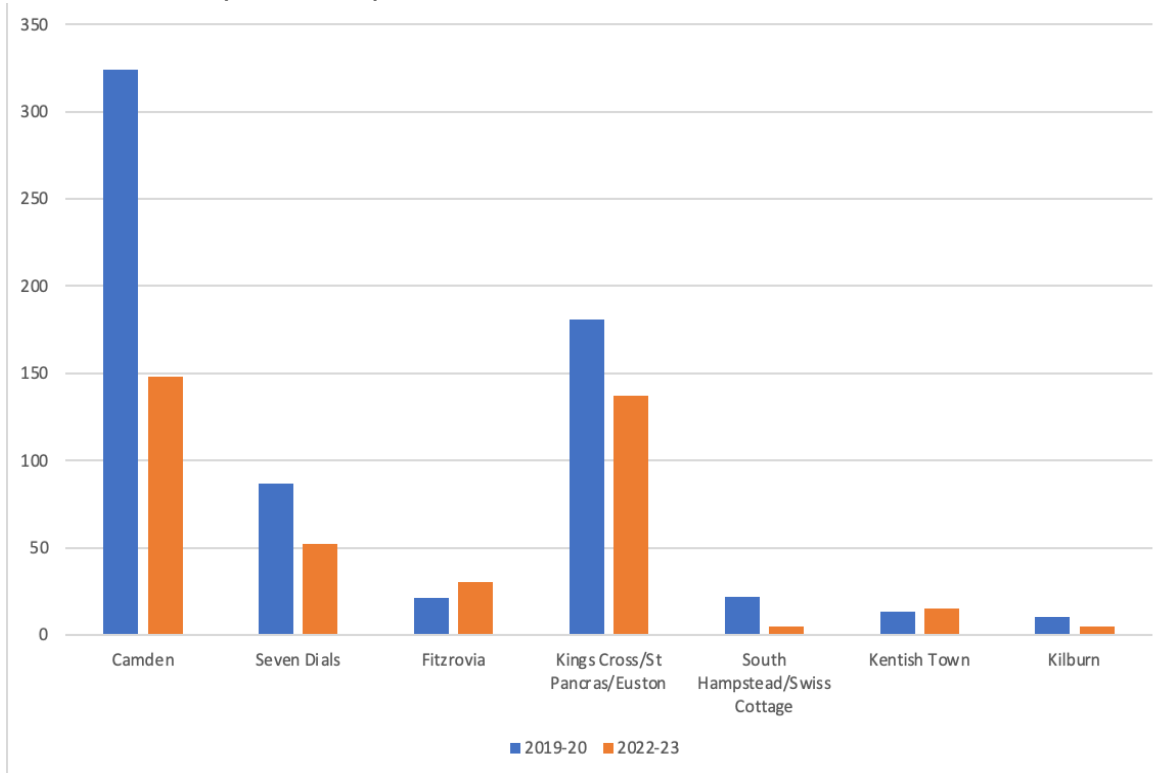


Figure 29. Comparison of all relevant night-time DRUG OFFENCES AND DRUG-RELATED ASB (18:00-05:59) 2019/20 vs 2022/23



- 3.2.10.2. Camden as a borough has seen a reduction of drug offences and drug related ASB of -34.8% when comparing the twelve-month period in 2019/2020 to that of 2022/2023.
- 3.2.10.3. Camden Town saw an overall reduction in offences by -54.3%, driven by the large reduction in possession of drugs (-66.3% reduction, n.169). This was somewhat offset by a significant increase in drug trafficking offences (increase of 212.5%, n.17) which may be due to a change in enforcement focus.
- 3.2.10.4. Seven Dials experienced a -40.2% (n.35) fall in overall offences with reductions in all but the “ASB drugs offence” category.
- 3.2.10.5. Although Seven Dials sees a large increase in *drugs offences* in percentage terms (+300.0%), the number of incidents has increased from just 3 in 2019/20 to 12 in 2022/23, so the volume is not significant enough to indicate any significant drugs issue here.
- 3.2.10.6. The overall picture in relation to drugs offences and incidents in both CIP areas appears to have improved in 2022/23 when compared with 2019/20.
- 3.2.10.7. Drugs related incidents in the Areas of Interest have seen an overall reduction in all but Fitzrovia. However, the +42.9% increase in offences seen here equates to only 9 incidents in total, so the volume is too low to indicate any significant drugs issues in this area.
- 3.2.10.8. Of all the Areas of Interest, King’s Cross/St Pancras/Euston has the highest volume of drugs offences, but it has also seen an overall decrease of -24.3% (n.44) in the years analysed.

Figure 30. Density of relevant night-time DRUG OFFENCES AND DRUG-RELATED ASB (18:00-05:59) in Camden, 1st April 2019 to 31st March 2020

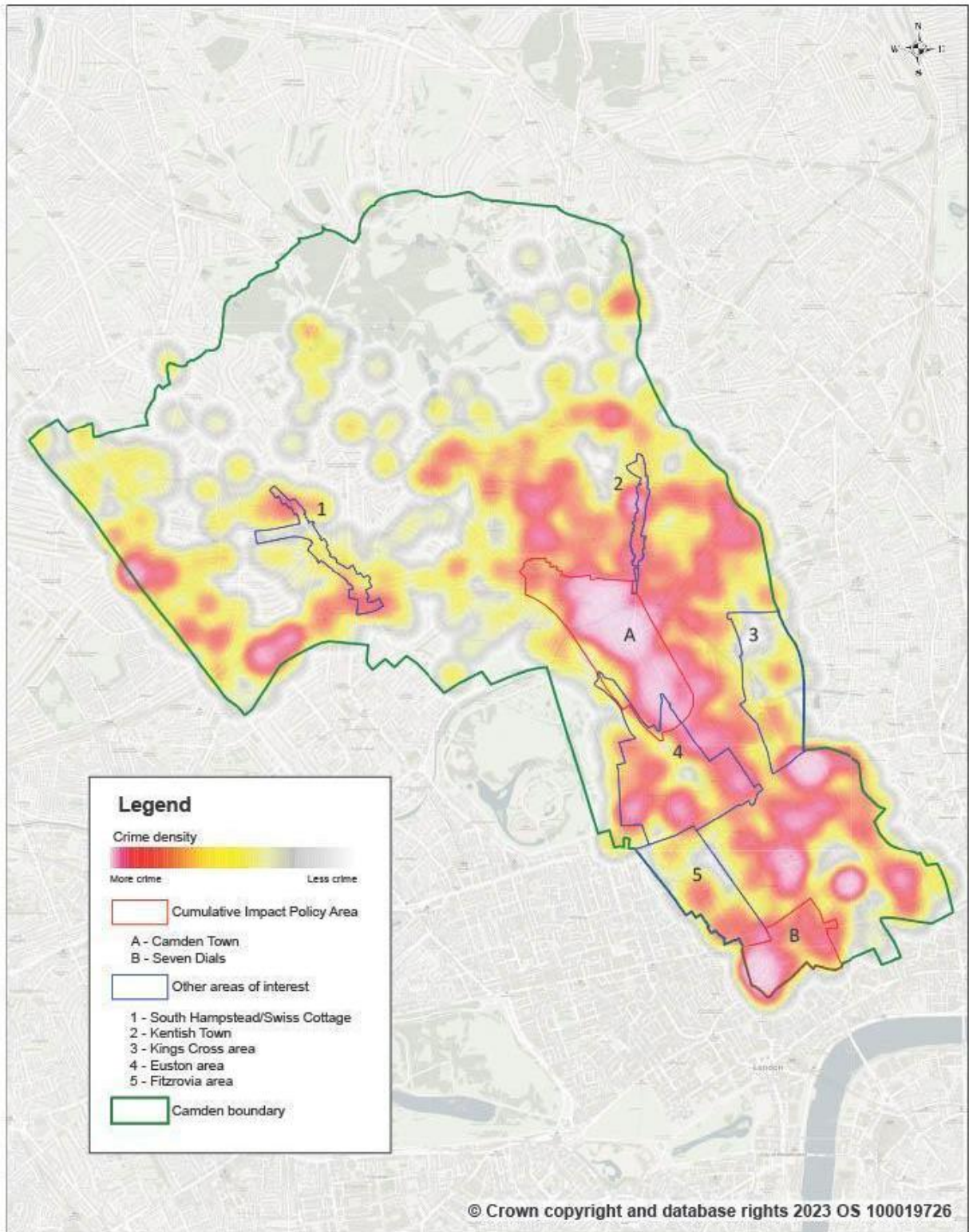
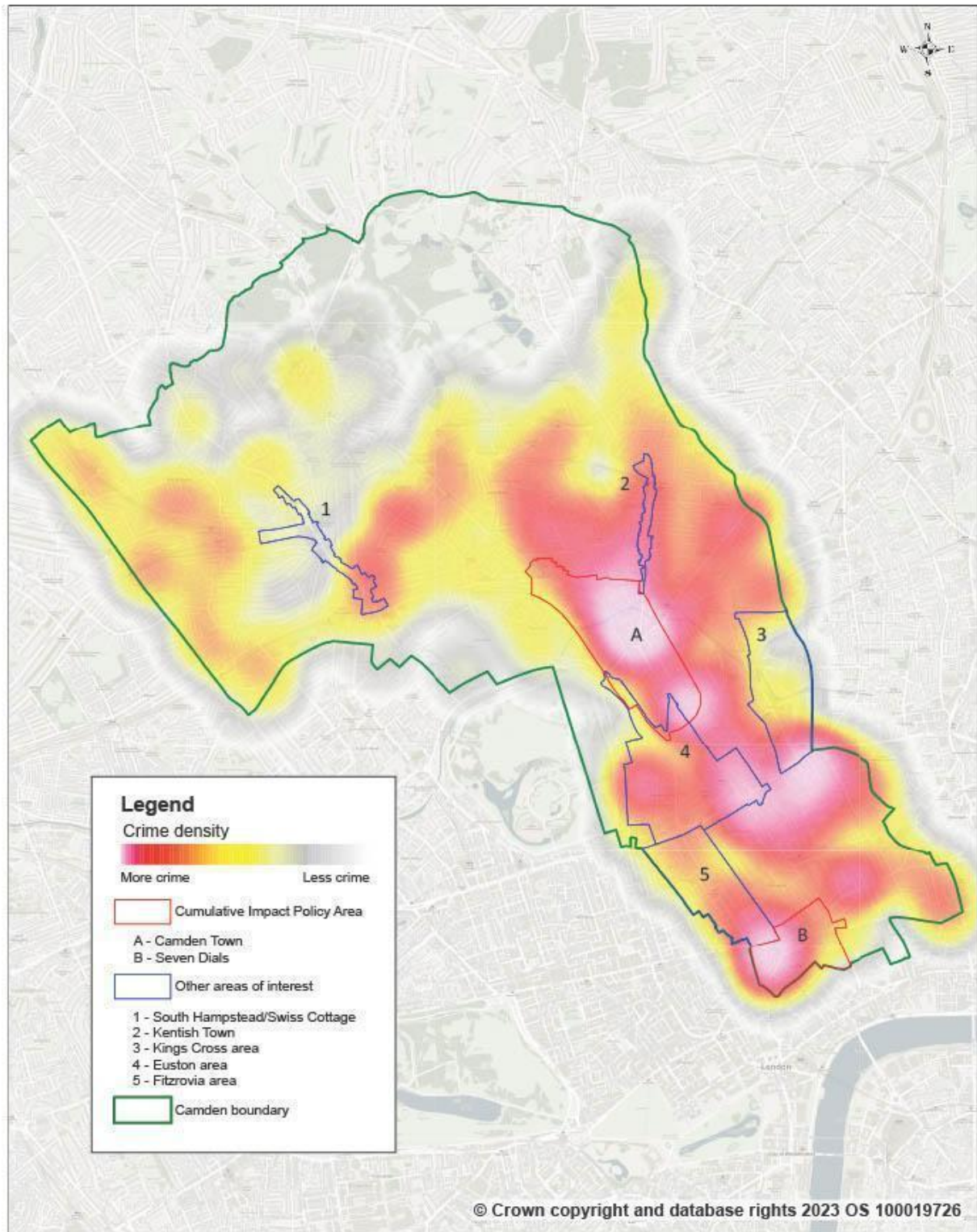


Figure 31. Density of relevant night-time DRUG OFFENCES AND DRUG-RELATED ASB (18:00-05:59) in Camden, 1st September 2022 to 31st August 2023



3.2.11. Other NTE-relevant ASB

3.2.11.1. The following tables, charts and hotspot maps set out the key changes over time for all those ASB incident types (between 18:00hrs and 05:59hrs) that *may* be associated with the clustering of licensed premises, their customers and the operation of the NTE.

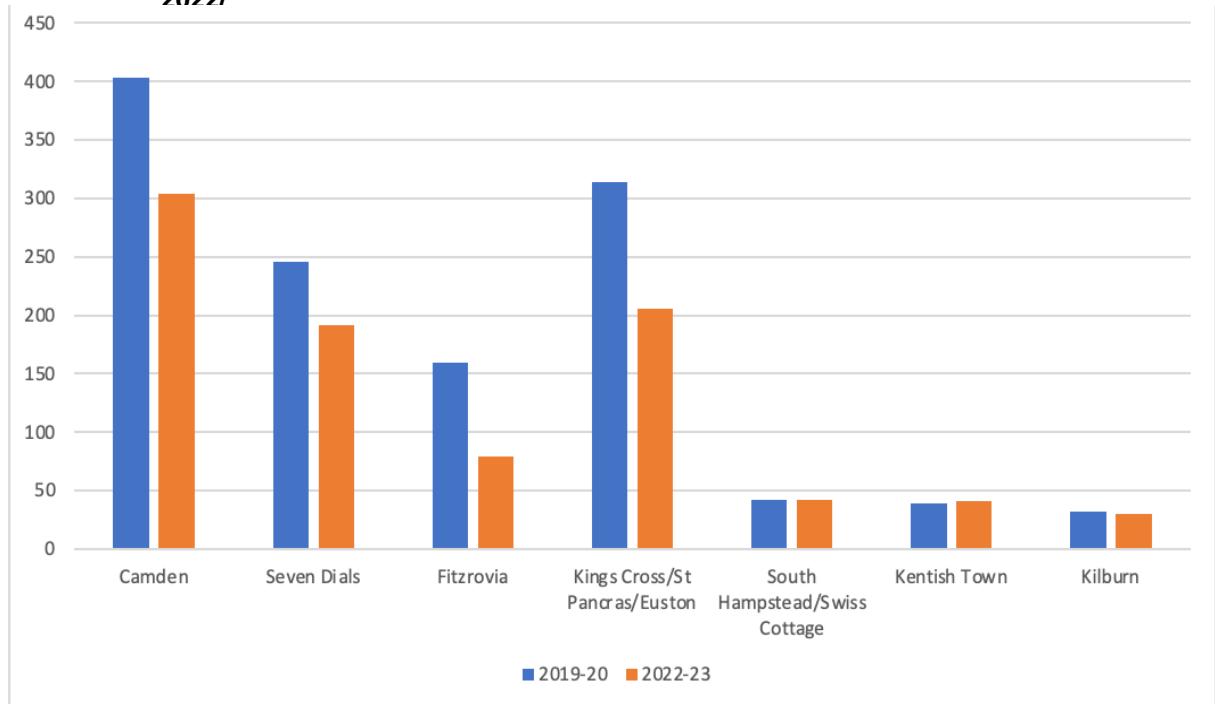
Figure 32. All relevant night-time (18:00–05:59) OTHER NTE-RELEVANT ASB in Camden, 2019/20 and 2022/23

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
Whole borough					
Rowdy or inconsiderate	2690	-	2057	-	-23.5%
Begging/vagrancy	222	-	150	-	-34.4%
Noise	303	-	181	-	-40.3%
Alcohol	31	-	12	-	-61.3%
Street drinking	10	-	2	-	-80.0%
Vulnerable	2	-	3	-	Increase
Licensing	0	-	1	-	Increase
Total	3258	-	2406	-	-26.2%
Camden Town					
Rowdy/inconsiderate	349	13.0%	270	11.2%	-22.6%
Begging/vagrancy	19	8.6%	11	7.3%	-42.1%
Noise	35	11.6%	21	11.6%	-40.0%
Alcohol	5	16.0%	2	16.7%	-60.0%
Street drinking	0	0	0	0%	-
Vulnerable	0	0	0	0%	-
Licensing	0	-	0	0%	-
Total	403	12.4%	304	12.6%	-24.6%
Seven Dials					
Rowdy or inconsiderate	214	8.0%	171	8.3%	-20.0%
Begging/vagrancy	21	9.5%	17	11.3%	-19.0%
Noise	10	3.3%	4	2.2%	-60.0%
Alcohol	1	3.2%	0	0.0%	Reduction
Street drinking	0	0.0%	0	0.0%	-
Vulnerable	0	0.0%	0	0.0%	-
Licensing	0	-	0	0.0%	-
Total	246	7.6%	192	8.0%	-22.0%
Fitzrovia					
Rowdy or inconsiderate	125	4.7%	60	2.9%	-52.0%
Begging/vagrancy	19	8.6%	13	8.7%	-31.5%
Noise	10	3.3%	6	3.3%	-40.0%
Alcohol	2	6.5%	0	0.0%	Decrease
Street drinking	2	20.0%	0	0.0%	Decrease
Vulnerable	1	50.0%	0	0.0%	Decrease
Licensing	0	-	0	0.0%	-
Total	159	4.9%	79	3.3%	-50.3%

London Borough of Camden: *Cumulative Impact Assessment Research Report, 2023*

	Offences 2019/ 2020	% whole borough offences 2019/ 2020	Offences 2022/ 2023	% whole borough offences 2022/ 2023	% change 19/20 vs. 22/23
KX / St Pancras/ Euston					
Rowdy or inconsiderate	287	110.0%	174	8.5%	-39.4%
Begging/vagrancy	29	13.0%	21	14.0%	-27.6%
Noise	22	7.3%	10	5.5%	-54.5%
Alcohol	1	3.2%	1	8.3%	-
Street drinking	2	20.0%	0	0.0%	Reduction
Vulnerable	0	0.0%	0	0.0%	-
Licensing	0	-	0	0.0%	-
Total	314	9.6%	206	8.6%	-34.4%
Hampstead/S. Cottage					
Rowdy or inconsiderate	39	10.5%	34	1.7%	-12.8%
Begging/vagrancy	0	0.0%	5	3.3%	Increase
Noise	3	1.0%	2	1.1%	Reduction
Alcohol	0	0.0%	0	0.0%	-
Street drinking	0	0.0%	1	50.0%	Increase
Vulnerable	0	0.0%	0	0.0%	-
Licensing	0	-	0	0.0%	-
Total	42	8.8%	42	1.8%	-
Kilburn					
Rowdy or inconsiderate	33	1.2%	38	1.8%	+1.7%
Begging/vagrancy	3	0.1%	2	1.3%	Reduction
Noise	2	0.7%	1	0.6%	Reduction
Alcohol	1	3.2%	0	0.0%	Reduction
Street drinking	0	0.0%	0	0.0%	-
Vulnerable	0	0.0%	0	0.0%	-
Concern for safety	0	0.0%	0	0.0%	-
Licensing	0	-	0	0.0%	-
Total	39	15.9%	41	1.7%	+5.1%
Kentish Town					
Rowdy or inconsiderate	25	0.9%	24	1.2%	-4.0%
Begging/vagrancy	3	1.35%	4	2.7%	Increase
Noise	2	0.7.0%	2	1.1%	-
Alcohol	2	6.45%	0	0.0%	Decrease
Street drinking	0	0%	0	0.0%	-
Vulnerable	0	0.0.0%	0	0.0%	-
Licensing	0	-	0	0.0%	-
Total	32	1.0%	30	1.3%	-6.3%

Figure 33. Comparison of all relevant OTHER NTE-RELATED ASB (18:00-05:59) 2019/20 vs 2022/



3.2.11.2. Over the period the borough has seen a reduction of Other NTE related ASB of -26.2% (n. 852). Every area of the borough above, except one, has experienced a reduction, including both the Camden Town (-24.6%, n.99) and Seven Dials (-22.0%, n.57) Cumulative Impact Policy areas.

3.2.11.3. The only area that has seen an increase is Kilburn with a +5.1% increase. This equates to only 2 incidents in total, so the volume is too low to indicate a significant night-time and NTE-related ASB issue in Kilburn.

3.2.11.4. The police recorded 1.0 million incidents of ASB nationally in the year ending March 2023. This was a -25% decrease compared with the year ending March 2020 (1.4 million incidents). The reduction seen in the borough and its CIP areas is therefore broadly on par with the national trend.

3.4. CCTV data

3.4.1. Introduction

- 3.4.1.1. CCTV data gives us a snapshot picture of what is really taking place in the public realm and how customers are using the night-time economy, the impact of licensed premises and how street drinkers are behaving when out and about using public space, both in the CIP areas and other town centres in the borough. These incidents are captured by CCTV operators in CCTV incident logs.
- 3.4.1.2. The data captures events that are, unless very serious, mostly not recorded by the police because the level of the incident is too low for them to be reported. However, they do have the potential to constitute cumulative impact and in particular affect the licensing objectives of crime and disorder, public safety and public nuisance and, to a lesser extent, protecting children from harm.

3.4.2. Methodology

- 3.4.2.1. CCTV data was mined from two sample periods of two months - April and May - in 2021, 2022 and 2023. April and May were chosen as May 2023 was the most recent data available at the time of the research. Two months were chosen for each year as a sampling period as the process of coding up individual incidents is painstaking and to view all months for the available years would require more resources than were available in the project.
- 3.4.2.2. 2021, 2022 and 2023 were chosen because for these three years the way the operators collected data was consistent. Prior to 2021 the system and recording methods were different so comparisons would be less reliable.
- 3.4.2.3. The anonymised data gives descriptions of each incident recorded by CCTV operatives in Camden. This is then coded by the researchers.
- 3.4.2.4. It is important to note that CCTV data cannot be seen as a 'census' of all *crime and disorder or public nuisance* taking place in the town centre or the existing cumulative impact policy areas. The reasons for this are set out in the following paragraphs.
- 3.4.2.5. There are approximately 1,450 council or TfL highway camera locations in the London Borough of Camden (excluding those inside public buildings and car parks).
- 3.4.2.6. However, despite the large number of cameras, they cannot possibly cover all locations and every simultaneous incident. There are also limits on what one CCTV operator can record at any one time, and they must prioritise when there may be multiple incidents happening.#

- 3.4.2.7. Most serious incidents of violence, robbery and disorder will be seen or reported to the CCTV control room by either the police on patrol or the security at licensed premises. However, a larger number of low-level incidents that are taking place will either be missed by operators or not prioritised because the operator needs to focus on the most serious incident at any one time.
- 3.4.2.8. It is also worth noting that CCTV cameras may not sometimes be operational or may be obscured due to trees or buildings. It is important to mention that noise incidents are not captured by CCTV. As such, this element will be missing from the CCTV data.
- 3.4.2.9. In summary, it is reasonable to say that the CCTV data is a substantial under-reporting of what is taking place in terms of *crime and disorder* and *public nuisance* in the public realm.
- 3.4.2.10. However, the three two-month periods of data collection do give a significant picture of the *type* of *crime and disorder* and *public nuisance* that is occurring in the two existing CIP areas and the other Aols. The data for the purposes here is therefore sufficiently robust.
- 3.4.2.11. It is worth noting that the volume of incidents in the months chosen - April and May - are not atypical across the year (i.e. unusually high or low). There are also no seasonal trends to the Camden data, e.g. some festive periods and peak summer periods are as high as these months, but others are lower.
- 3.4.2.12. All CCTV records were manually reviewed by the researchers and a decision made to include or exclude based on whether they were night-time economy associated or had a reasonable correlation with the cumulative impact of licensed premises within the existing CIP areas and the other town centres. The following criteria was used for cumulative impact:
- Was there a mention of somebody causing a problem when entering, leaving a licensed premises (this includes late night refreshment places as well as pubs, bars, restaurants etc.)
 - Was somebody demonstrably drunk or exhibiting intoxicated behaviour (alcohol or drunk) in any location?
 - Was there a fight, altercation, theft or use of drugs that could be reasonably linked to users of the night-time economy?
 - Was there begging associated with licensed venues specifically or targeting of the users of the night-time economy who would not be there if there were not clusters of licensed premises?
 - Any other incident that has a reasonable connection to the customers of the night-time economy and licensed premises, whether as a perpetrator or as a victim of crime.

3.4.2.13. It is important to note that in many instances it is not possible (by the very nature of CCTV data) to prove that each incident is *absolutely* linked to a licensed premises or not. The ‘balance of probability’ has been used, based on the fine grain detail of the individual reports. If someone is staggering around in the street, whether day or night, it has been assumed that they have been drinking alcohol, albeit there may be another cause, such as illegal drugs or a medical condition.

3.4.2.14. A final point of importance is that by definition the council has installed cameras where it feels they are most needed. Thus, they are over-represented in high crime and incident locations. The data is not directly compatible between locations but gives an idea of where council and police resources are being deployed to manage the impacts of the NTE, where the customers of licensed premises who have misused alcohol or have become a victim of crime and where associated issues such as drug selling are most common.

3.4.3. Findings

3.4.3.1. The table below sets out the three years’ worth of relevant incidents from the sample periods of April and May from 2021-23.

Figure 34. CCTV findings: sample incidents, 2021, 22 and 23

	Camden Town	Seven Dials	Fitzrovia (TCR)	Kentish Town	Kilburn	S Cottage /S H’sstead	KX / St Panc / Euston	Total CIPs / Aols	Total Camden
Apr-21	10	0	1	0	0	0	2	13	146
May-21	16	1	1	0	1	0	3	22	156
Apr-22	17	1	0	0	0	0	2	20	74
May-22	9	2	2	1	0	0	1	15	55
Apr-23	27	7	3	1	1	0	7	46	162
May-23	27	4	4	2	1	1	12	51	164

3.4.3.2. During the two sample months in May and June over the three-year periods a significant finding is that the CCTV appears in Camden to capture a relatively low proportion of the incidents that are reported to the police (albeit many of the most serious incidents are captured in the records).

3.4.3.3. There are reduced incidents in 2022. In 2023 they return to 2021 levels.

- 3.4.3.4. Camden Town CIP has the most incidents captured but this may be in part due to the high camera and operator focus in this area. These incidents are predominantly fighting and drug dealing. Inverness Street is the most frequently appearing location in the records followed by locations such as Camden Town Tube, Parkway and the markets, all of which have a relatively small number of incidents captured.
- 3.4.3.5. Kings Cross. St Pancras and Euston is the area of interest with the next largest number of incidents. Here there are a mix of incidents including drunken behaviour, fighting, though relatively limited drug dealing. The area to the south of Kings Cross Station which has known street drinking hotspots is an area where cameras pick up frequent incidents of fighting and drunk and disorderly behaviour.
- 3.4.3.6. Of those incidents that are recorded taking place in the Seven Dials CIP area, none are in Seven Dials itself. They tend to be on the northern periphery around Bloomsbury and New Oxford Street.
- 3.4.3.7. In the sample of incidents reviewed, there were virtually no incidents recorded for Fitzrovia and all but one of the 11 that were recorded over the three sample periods took place on the periphery on Tottenham Court Road. There was only one incident recorded in 'inner' Fitzrovia.
- 3.4.3.8. In all the other areas of interest the CCTV incidents tend to be much more daytime. This may be linked to the absence in these areas of a significant late-night economy. The number of incidents within the CIP areas and Aols - as a proportion of overall incidents recorded by the CCTV in the borough - are relatively small (albeit they rise to about one third of the total 2023).
- 3.4.3.9. The table below grosses up the two-month sample in each year to give an overall indication of the number of incidents that are captured each year by CCTV. Given that there are few seasonal variations this is reasonable.

Figure 35. CCTV findings sample generalised up for the whole of 2021, 2022 and 2023

	Camden Town	Seven Dials	Fitzrovia (TCR)	Kentish Town	Kilburn	S Cottage /S H'stead	KX / St Panc / Euston	Total CIPs / Aols	Total Camden
2021	156	6	12	0	6	0	30	209	1807
2022	156	18	12	6	0	0	18	209	772
2023	323	66	42	18	12	6	114	580	1951

- 3.4.3.10. In 2021 and 2023 there were up to almost 2,000 estimated incidents per year observed on CCTV in Camden. Of these, around a tenth in 2021 and just over a quarter in 2023 could be reasonably linked to licensed premises, their customers and the NTE. In 2022 this was much lower - around 800 but the proportion in the CIP area/AoIs was around a quarter of incidents in the borough.
- 3.4.3.11. Whilst this number appears large at first sight, in reality, it is actually rather low, with only around 4 incidents a week in 2021 and 2022 in the CIP area/AoIs and around 9 in 2023. Given these are the heart of the borough's NTE and street drinking hotspots, this is much lower than might be expected.

3.4.4. Summary

- 3.4.4.1. Overall, the number of incidents recorded by CCTV that could be reasonably linked to the licensed / NTE economy is low in Camden, particularly when compared to the larger numbers of incidents that are recorded by the police. The reasons for this are complex (e.g. recording practices and consistency, staff resources and the conservative attribution of incidents in this cumulative impact review), but overall only Camden Town has any notable clustering of incidents, and even then, it is low and mostly concentrated around Inverness Street.
- 3.4.4.2. Below is a redacted sample of the types of incidents recorded by CCTV operators.

Figure 36. CCTV records - sample of typical incidents

Location	Landmark(s)	Incident/Activity & Outcome
Euston Road	[Betting shop]	Drunk homeless male refusing to leave shop
Camden High Street	Outside bank	Two females fighting. One arrested for GBH
Camden High Street	[Late venue]	Fight outside [redacted venue]
Camden High Street	Bookshop	3 drunk people having an argument in the street. Observed until police attended. No arrests.
Kingsway	Holborn Tube Station	Report of male with a bottle threatening people. Area search. Male now outside of the supermarket. Police on scene. Male last seen Endell Street
Camden High Street	Buck Street	Couple arguing. Police on scene. After a struggle, both parties were arrested, male was taken to hospital with facial injuries.
Chalk Farm road	[Redacted pub]	Fight outside [redacted pub] Chalk Farm Road. Male seen fighting with 4-5 females. One female received an injury to head in a struggle. Male ran off down Ferdinand Street after losing his top. Fight caught on CCTV.
Camden High Street	[Redacted club/bar]	Report of fight outside [redacted bar]. Security seen giving first aid to male on the floor. Police on scene. Male taken to hospital
Camden High Street	[Redacted club/bar]	Report of distressed female in Camden High Street outside [redacted club/bar]. female found outside of fast food LNR. Female taken home by police.
Camden High Street	[Redacted club/bar]	Report of assault outside the [redacted club/bar]. Suspect spotted by CCTV. Male detained by police. Male arrested for assault.
Camden High Street	Underhill Passage	Male found unconscious at location. Playback shows male being assaulted at 01:11hrs. Male was later arrested on Arlington Road for GBH. Victim taken to hospital with head injuries.
Tottenham Court Rd/New Oxford Street	Outside theatre	Drunk male collapsed.
Endell Street	Endell Street	20 Drunk males seen throwing bottles and rubbish on Endell Street. CCTV scanned the area, unable to locate the males.
Camden High Street	Camden Town Tube Station	Report of a group of males masked up with weapons. Police on scene. All calm. Drug dealers.
Camden high street	Camden Town Tube Station	Male arrested for drunken behaviour at the location.

Location	Landmark(s)	Incident/Activity & Outcome
Camden High Street	Kentish Town Road	Fight happening in the street, CCTV monitoring.
Camden High Street	Camden Town Tube Station	CCTV located three males on electric bikes committing robberies on Camden High Street.
Camden High Street	Jamestown Road	5 males in their 50s drunk and disorderly urinating through [business] letter box.
Camden Town	Kentish Town Road	Male outside [redacted bar] threatening people.
Eversholt street	[Redacted club/bar]	Fight happening outside [venue]
Camden High Street	N/A	CCTV located 4 males robbing a victim of his mobile phone on Camden High Street
Camden High Street	[Redacted club/bar]	Male inebriated / intoxicated - causes ASB at Food & Wine opposite Crowndale centre/traffic lights.
Tottenham Court Road	[Redacted fast-food venue]	Monitoring a drunk male staggering around
Inverness Street	N/A	Bar security detained customer - Lawful eviction.
Camden High Street	Bus stop Y	Report of assault outside [redacted shop]. Male hit over head minor cuts; none life changing. Police & ambulance on scene
Charring Cross Road	Redacted shop	Fight at location. 2 males detained for common assault. One of the males was also arrested for being drunk.
Tottenham Court Road	New Oxford Street	Monitoring police chasing suspect for phone snatches in the area.
Camden High Street	HSBC Bank	CCTV located a fight taking place on the street. Police were informed and one male was arrested. Other male sustained injuries.
York Way	[Redacted fast-food venue]	Monitoring police arrest of a female for DV assault and being drunk and disorderly.
Kings Cross Road/ Grays Inn Rd	[Redacted bar / club venue]	Stabbing incident. 2 x males were stabbed at the location. Police and LAS attended. Both individuals suffered non-life threatening and non-life changing injuries.
Camden High Street	Bank	Male injured with a lot of blood around by the bank
Inverness street	[Redacted bar / club venue]	Male slashed with a knife to the hand at [redacted bar / club venue]

Location	Landmark(s)	Incident/Activity & Outcome
Tottenham Court Road	New Oxford Street	Male seen attacking others and was shirtless. CCTV monitoring and male was stopped and arrested for sexual assault.
Tottenham Court Road	N/A	Drug dealer seen by CCTV concealing a large bundle of class A drugs.
Camden High Street	[Redacted pub]	Female kicking off and making racist comments to door staff
Camden High Street	[Redacted pub]	Female victim headbutted outside the [Redacted pub]
Holborn	Underground Station	ASB - drunk male causing seen in the station, broke bottle on the floor BTP arrested him.
Euston Road	[Redacted pub]	Disturbance in [redacted pub] - six drunk males refusing to leave
inverness Street	N/A	Report of large fight in Inverness Street. Fight not seen as security had already broken it up
Camden High Street	Redacted bar	Drunk female in the street being assisted by officers.
Euston Road	Kings Cross Station	Report of assault on male. Play back shows assault at 02:16 hrs.
Pentonville Road	[Redacted fast-food restaurant]	CCTV located a robbery outside [redacted fast-food restaurant]. Group of males robbed two males of a mobile. Suspect dumped the phone and was detained by police.
Camden High Street	Inverness Street	CCTV Located a fight taking place between 3 males on Camden High street.
Tottenham Court Road	[Redacted pub]	Male assaulted with a head injury. Police on scene.
Crowndale Road	[Redacted bar / club venue]	CCTV located a male being robbed in the street outside [Redacted bar / club venue].
Inverness Street	[Redacted bar / club venue]	1x male stabbed.
Inverness Street	N/A	Fight between two males. One male questioned by police. Second male last seen fleeing down Arlington Road
Camden High Street / Britannia Junction	Bank	Female seen throwing rubbish all over the place. Police on scene. Female taken home by police after questioning

3.6. London Ambulance Service data

3.6.1. Introduction

3.6.1.1. The purpose of analysing ambulance data is to understand any relationship between clusters of licensed premises and alcohol-related call outs that may suggest negative impact.

3.6.2. Methodology

3.6.2.1. Ambulance call-out data is provided to a limited level of granularity by the London Ambulance Service (LAS). It is only provided through the SafeStats platform at lower super output area (LSOA) geography. This is to protect patient confidentiality.

3.6.2.2. And, whilst there is reasonable reliability of this dataset, there are some limitations and quirks that must be considered when reading the data.

3.6.2.3. In theory, LAS paramedics apply an alcohol 'flag' to all "all attendances to incidents or injuries where alcohol is determined as a factor". Those incidents that the LAS includes in this data will therefore incorporate those callouts where the patient has themselves become so intoxicated that they required assessment or treatment, or where they have been the victim of crime whilst they or the perpetrator has been intoxicated *in the view of the paramedics doing the recording*.

3.6.2.4. However, there is known under-attribution of alcohol in recording by paramedics (not just in London) when assessing those patients that they are called to attend. This may be due to several factors, such as paramedics being new to the job, a lack of appropriate training, a lack of consistency in recording, the discretion to flag alcohol or not to flag and, most importantly, the paramedics' primary responsibility of focusing on the patient and thus prioritising their welfare, often in difficult situations, over the completion of forms.

3.6.2.5. For example, a recent study by Manca F et al (2021) Estimating the Burden of Alcohol on Ambulance Callouts through Development and Validation of an Algorithm Using Electronic Patient Records manually reviewed all ambulance attendance records for a defined period at weekends in a specific location (not London). This found that the number of call outs likely to be alcohol-related at weekends between 6pm and 6am was at least 27%. This was a significant increase over previous studies which typically suggested that the figure was around 10%. This study included call outs to domestic locations.

3.6.2.6. Whilst this study's results cannot be seamlessly transferred to LAS data recording practices, it is reasonable to suggest that, particularly at weekends, figures may be higher than those shown in the tables below.

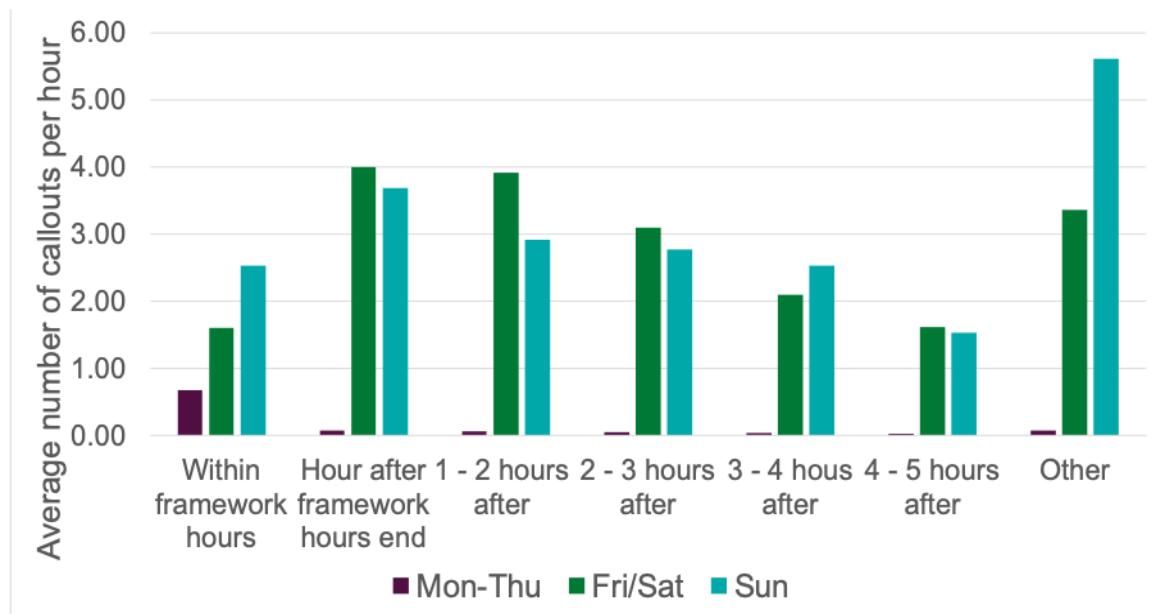
3.6.2.7. Secondly, it is important to state that not all LAS alcohol-related call outs are for those patients using licensed premises in the borough (either on or off premises). There are other potential causes. For example, domestic violence where the seriousness of the assault has been magnified by alcohol consumption (responsibility always remains with the perpetrator) and where the perpetrator’s alcohol has not been bought locally. Alternatively, there are those socialisers or clubbers who arrive in Camden having become intoxicated elsewhere and who may end up in an incident such as a pedestrian-vehicle collision or victim of an assault or robbery.

3.6.2.8. It is impossible to be more precise in this analysis than to say that the LAS attendance has taken place in Camden and to give its time and location.

3.6.3. Findings

3.6.3.1. The chart below shows the number of hourly alcohol-related ambulance call outs to Camden Ambulance call outs during framework hours, then in hourly periods after the latest framework hour (e.g., midnight on a Saturday) and then those ‘other’ call outs 5 hours after the last framework hours but before the next framework hour commences again.

Figure 37. Average number of alcohol-related callouts per hour during and after framework hours 2019 to 2022

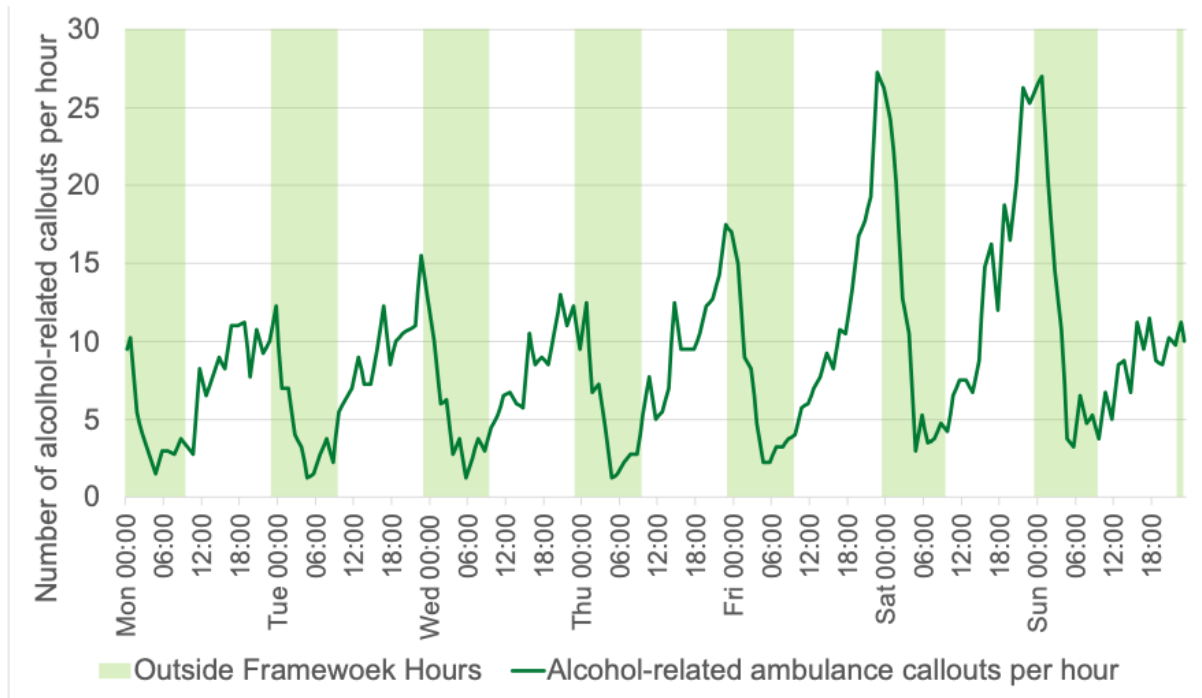


3.6.3.2. For information, framework hours in Camden are currently:

- Monday to Thursday 10:00am until 11:30pm (13.5 hours / 56% of 24hr day)
- Friday and Saturday 10:00am until midnight (14 hours / 58% of 24hr day)
- Sunday 11:00am until 10:30pm (12.5hrs / 52% of 24hr day).

- 3.6.3.3. Overall, alcohol-related ambulance call outs are relatively low within framework hours in Camden - at less than one per hour from Monday to Thursday (average).
- 3.6.3.4. Alcohol-related ambulance call outs during framework hours on Saturday are more than double the rate of call outs during the week (at 1.6 per hour).
- 3.6.3.5. Sunday has the highest number of alcohol-related ambulance call outs to Camden within framework hours. This is the busiest day of the week in terms of the borough's night-time economy. This is predominantly due to the early hours of Sunday morning following on from Saturday being the big night out in the borough, rather than Sunday afternoon or Sunday evening drinking.
- 3.6.3.6. In the hour following the end of framework hours, alcohol-related ambulance call outs jump significantly on the weekend nights to around 4 call outs per hour.
- 3.6.3.7. However, for Monday to Thursday there are negligible alcohol-related ambulance call outs. This remains true for the six hours following the end of framework hours between Monday and Thursday.
- 3.6.3.8. This mostly likely reflects the user patterns and footfall volume of the night-time economy in terms of weekend activity.
- 3.6.3.9. Unlike during the week, at the weekend there are considerably elevated numbers of alcohol-related call-outs post-framework hours (i.e., between midnight and 5am). In the first two hours after framework hours (i.e., from midnight to 2am) there are around 4 call outs per hour. This then declines to 1.5 call outs per hour on average between 4am and 5am.
- 3.6.3.10. The *other* category includes the period starting five hours *after* the last framework hour (i.e., 3:30am Sunday, 4:30am weekdays and 5am Saturday morning / Sunday morning) and until the start of framework hours again.
- 3.6.3.11. For example, on Sunday 'other' covers the time from 5am to 11am. This suggests a high number of ambulance call outs during the early part of Sunday morning. This is likely to be a combination of those still out in the night-time economy till a very late hour (Camden Town for example still sees many people on the street past 5am) and potentially those who have carried on drinking at home (with alcohol that *may or may not* have been purchased in the borough's 24-hour off-licences).
- 3.6.3.12. The following chart shows a time-series analysis of the same data as above.

Figure 38. Number of hourly ambulance call outs by day of week and time of day, 2019 -22



- 3.6.3.13. This chart also allows us to see the breakdown of alcohol-related ambulance call outs by day of week during the week. It shows a slight build-up of callouts during the week, peaking at the end of Friday night before midnight and just after midnight Saturday morning. This pattern is then repeated for the same 11pm to 1am on Saturday / Sunday.
- 3.6.3.14. The chart shows a clear temporal pattern of a moderate rise in alcohol-related ambulance call outs during the 6am to 6pm period, but then a spike in alcohol-related call outs begins around 6pm and this is most pronounced on Friday and Saturday nights.
- 3.6.3.15. After framework hours there is a rapid drop off in alcohol-related call outs down to a consistent low point at around 6am each morning – regardless of the day of the week.
- 3.6.3.16. The following charts show the number of alcohol-related call outs to Camden by month and year, allowing the impact of the pandemic to be seen in some detail.

Figure 39. Trend in alcohol-related LAS call outs by day of week and time of day, 2019-22.

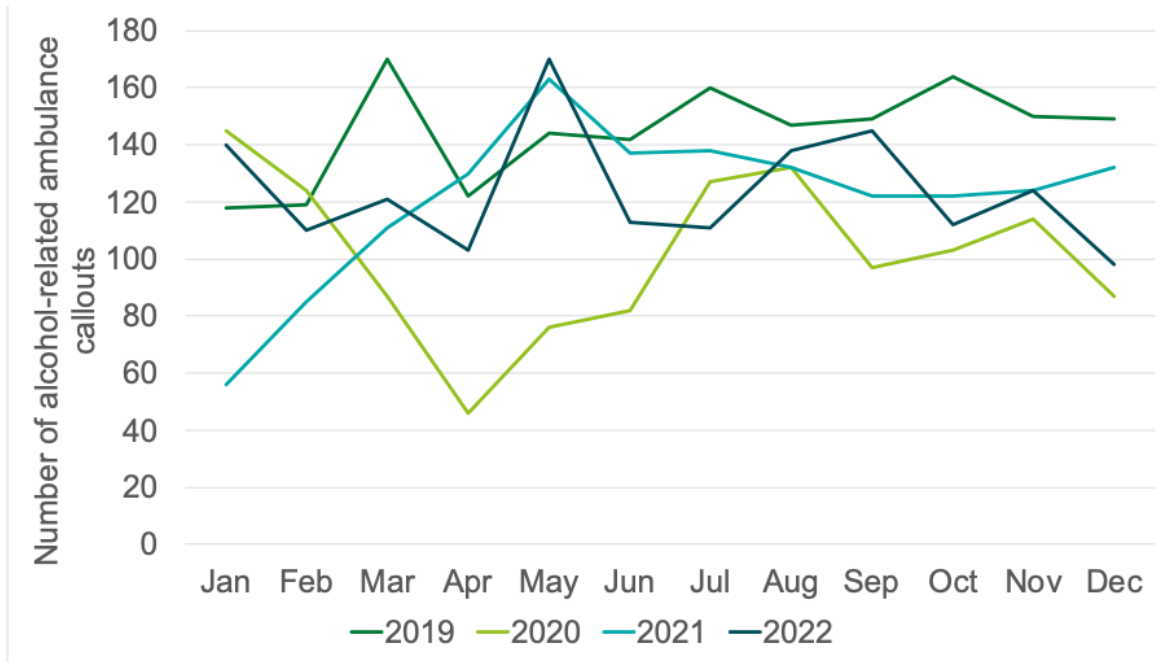


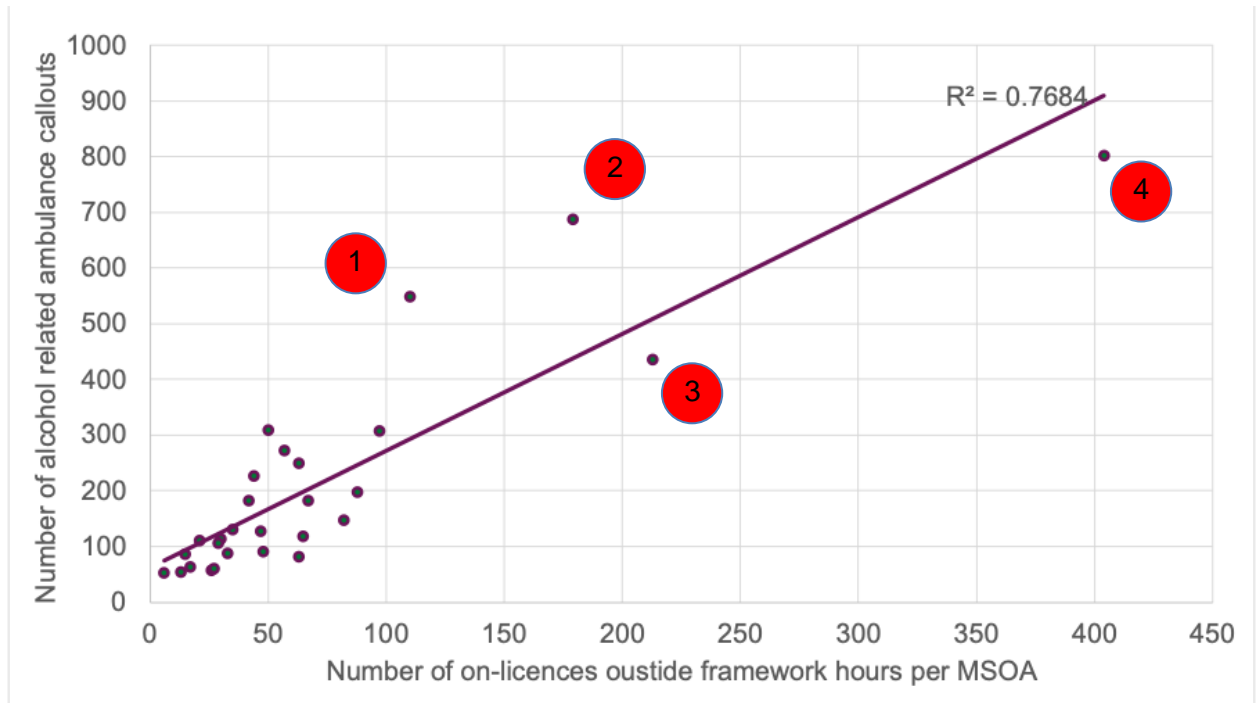
Figure 40. No. of hourly alcohol-related LAS call outs by day of week & time of day, 2019-22

Month	2019	2020	2021	2022
Jan	118	145	56	140
Feb	119	124	85	110
Mar	170	87	111	121
Apr	122	46	130	103
May	144	76	163	170
Jun	142	82	137	113
Jul	160	127	138	111
Aug	147	132	132	138
Sep	149	97	122	145
Oct	164	103	122	112
Nov	150	114	124	124
Dec	149	87	132	98
Total	1734	1220	1452	1485

- 3.6.3.17. The headline pattern is that the pandemic lockdowns appear to have had a considerable impact on alcohol-related ambulance call outs in Camden (a significant reduction of -30% between 2020 and 2019).
- 3.6.3.18. However, alcohol was still available in off-licences and supermarkets, as well as through home delivery during the pandemic and academic research shows that overall alcohol consumption remained at similar levels* in England despite the closure of on-premises such as pubs, restaurant, bars in nightclubs, i.e. with increased home drinking making up the missing on-premises consumption (*Ref. Hardy et al, 2022, *The impact of changes in COVID-19 lockdown restrictions on alcohol consumption and drinking occasion characteristics in Scotland and England in 2020: an interrupted time-series analysis*).
- 3.6.3.19. The explicit reasons for this fall in alcohol-related call outs are not known, but it may be that emergency services being overwhelmed dealing with Covid cases meant people with other problems such as those linked to alcohol were less likely to call 999. However, it is defensible to say that when licensed premises are closed the number of alcohol-related ambulance call outs falls significantly, even when societal alcohol consumption remained broadly the same.
- 3.6.3.20. In 2020 the chart shows there is an immediate impact on alcohol-related call outs when the country locks down on March 26th. alcohol-related call outs then start rising moderately in April but stay at a much lower than historical level till the end of June.
- 3.6.3.21. Towards the end of June there is a sharp rise that takes call outs back up to these near historical levels seen in 2019. This coincides with the relaxing of the 2m social distancing rule on 23rd June 2020 and the opening of pubs on 4th July.
- 3.6.3.22. At the end of August, local lockdowns commenced and in September the 'rule of six' and the 10pm curfew were introduced. At that time the data above shows that there is another drop off in alcohol-related ambulance admissions. Given that alcohol-related ambulance callouts peak in Camden on weekends between 11pm and 1am, these falls, whilst not causal, are strongly associated with the restrictions imposed on the operation of on-licensed premises at that time.
- 3.6.3.23. There was a small rise in alcohol-related ambulance callouts in October 2020. However, during November England went into a second national lockdown and in December 2020 London went back into a local lockdown (19th December, tier 4). This essentially cancelled the Christmas and New Year season for the on-licensed trade. At that time there was an accompanying fall in alcohol-related ambulance call outs in Camden.
- 3.6.3.24. On 6th January 2021 there was the third national lockdown. This appears to have impacted alcohol-related alcohol ambulance call outs in Camden as they fall to less than 60 a month.

- 3.6.3.25. During February and March 2021 there was a notable increase in alcohol-related alcohol ambulance call outs in Camden, despite the hospitality and night-time economy remaining shuttered. This suggests that whilst the NTE has a significant impact on alcohol-related call outs (as shown by the hourly data previously) there are other contributors, e.g., drinking in public and drinking at home, which when done to excess still required significant paramedic attendance.
- 3.6.3.26. In April 2021 pub gardens were allowed to open in England, and on 17th May indoor drinking in on-licence premises (excluding nightclubs, theatres etc.) were also allowed to open. This also combined with times when councils supported outdoor drinking, eating and streateries under the provisions contained in the Business and Planning Act 2020.
- 3.6.3.27. At this point – May 2021 - the number of alcohol-related alcohol ambulance call outs in Camden rises rapidly to its highest level in 2021 at around 160 a month.
- 3.6.3.28. In June, as all restrictions are lifted, there is a small fall in alcohol-related ambulance call outs and they then remain at a consistent level from June to December 2021, averaging around 120-140 callouts a month.
- 3.6.3.29. The opening of nightclubs on 19th July 2021 appears to have had no impact on the number of alcohol-related ambulance call outs in Camden. This is also reflective to some degree of the peak time for alcohol-related calls outs – weekends between 11pm and 1am, rather than the 1am to 5am peak operational time of nightclubs in the borough.
- 3.6.3.30. Overall, in 2022, there is a notable fall across the year in alcohol related ambulance call outs in Camden compared to 2019 (120 a month versus 150 a month pre-pandemic). There is one exception - a peak in May.
- 3.6.3.31. It is too early, and the analysis is insufficiently granular, to draw statically significant conclusions, but this may be the new norm. That is, there are now fewer alcohol-related ambulance callouts in Camden as a matter of course, and that the impact of alcohol sales and consumption has lessened their impact on the LAS, relative to when the CIPs were last reviewed.
- 3.6.3.32. The following section explore the correlation between outlet density and ambulance call outs
- 3.6.3.33. The following chart examines any statistical correlation between the number of alcohol-related alcohol ambulance call outs in Camden relative to the density of licensed outlets operating *beyond framework hours*.
- 3.6.3.34. (NB. The analysis uses the medium super output area level area of geography. An MSOA is an area within a borough that on average has around 7,800 residents or 2000 households. There are 28 MSOAs in Camden).

Figure 41. Number of alcohol-related ambulance call outs against premises density 2019 to 2022 by MSOA



3.6.3.35. Overall, there appears to be a strong correlation between the density of licensed premises operating beyond framework hours and the number of alcohol-related ambulance callouts.

3.6.3.36. Those MSOAs with less than 100 licensed premises operating beyond framework hours (which is all but four MSOAs in Camden) tended to have fewer than 300 alcohol-related ambulance call outs over four years. Indeed, the median of these MSOAs is around 150 alcohol-related ambulance call outs over the period.

3.6.3.37. However, there are four MSOAs with significantly higher levels of alcohol-related ambulance call outs.

3.6.3.38. MSOA 4 has around 400 licences and has the highest number of alcohol-related ambulance call outs at approximately 800 over the past four years. However, this MSOA is still *beneath* the line, so whilst in absolute terms it is high in ambulance call outs, in relative terms it is below the median. MSOA 4 is shown below and covers a substantial amount of the Seven Dials CIP area (but also includes some areas beyond the CIP area).

Figure 42. MSOA 4 boundary with highest absolute number of ambulance call outs in Camden.



- 3.6.3.39. MSOA 3 has the second highest number of licensed premises operating beyond framework hours of any MSOA in Camden, but like MSOA 4 above, is below the median line for the number of ambulance call outs.
- 3.6.3.40. MSOA 3 covers a large part of Fitzrovia, including Goodge Street, Tottenham Court Road up to Warren Street and a small part of Bloomsbury. This area may have a 'below median' number of incidents per licensed premises (operating after framework hours) because the types of premises are heavily skewed towards food rather than drinking and late-night entertainment. None of this is in either of the existing cumulative impact policy areas.
- 3.6.3.41. The two MSOA outliers (numbers 1 and 2) above the median line where the ratio of alcohol-related ambulance call outs to licensed premises (operating outside framework hours) are high both in absolute terms and but also in relative terms.
- 3.6.3.42. MSOA 1 covers the area to the east of Euston, all of St Pancras, Kings Cross (front of station) and Somers Town. None of this is in a CIP area. The boundaries are shown below.

Figure 43. MSOA 1 boundary – Euston, St Pancras, Kings Cross and Somers Town



3.6.3.43. Of all the four MSOAs with high numbers of alcohol-related call outs, MSOA 2 has the highest number of call outs relative to number to licensed premises. This is the MSOA that makes up a significant part of the Camden Town CIP.

Figure 44. MSOA 2 boundary – Camden Town CIP (share of)



3.6.3.44. However, whilst there is a clear correlation between premises density and alcohol-related ambulance call outs, the relationship is broadly proportionate. That is, the line does not follow an exponential curve but a relative one and there are few outliers.

3.6.3.45. To further understand if the relationship between premises density and alcohol-related ambulance call outs is statistically significant, a ‘regression analysis’ analysis was undertaken. This regression analysis gives us an R2 number. This is known as the ‘coefficient of determination’. In plain language, the R2 number tells us how well a pattern is explained by the variables being analysed. The closer the number towards 1, the greater the correlation between the variables. For example, an R2 figure of 0.50 in this study would suggest that half of alcohol-related ambulance callouts are explained by the density of licences outside framework hours.

3.6.3.46. In this case the regression analysis gave a figure of 0.7684. This means that more than 75% of the relationship between alcohol-related ambulance call outs is explained by the density of licences outside framework hours. This is a high level of correlation. Typically, statisticians would use the following table as a guide to statistical robustness (with a degree of interpretation based on what it is that is being studied).

Figure 45. Level of correlation given by the ‘R2’ number

R-Squared	Interpretation
0.75 - 1	Significant amount of variance explained
0.5 - 0.75	Good amount of variance explained
0.25 - 0.5	Small amount of variance explained
0 - 0.25	Little to no variance explained

3.6.3.47. The following table shows the density of licensed premises per hectare and also the density of alcohol-related (AR) call outs per hectare. Each Camden MSOA is shown and separate from this is the data for the two existing CIPs.

Figure 46. Alcohol-related call outs shown by density per hectare

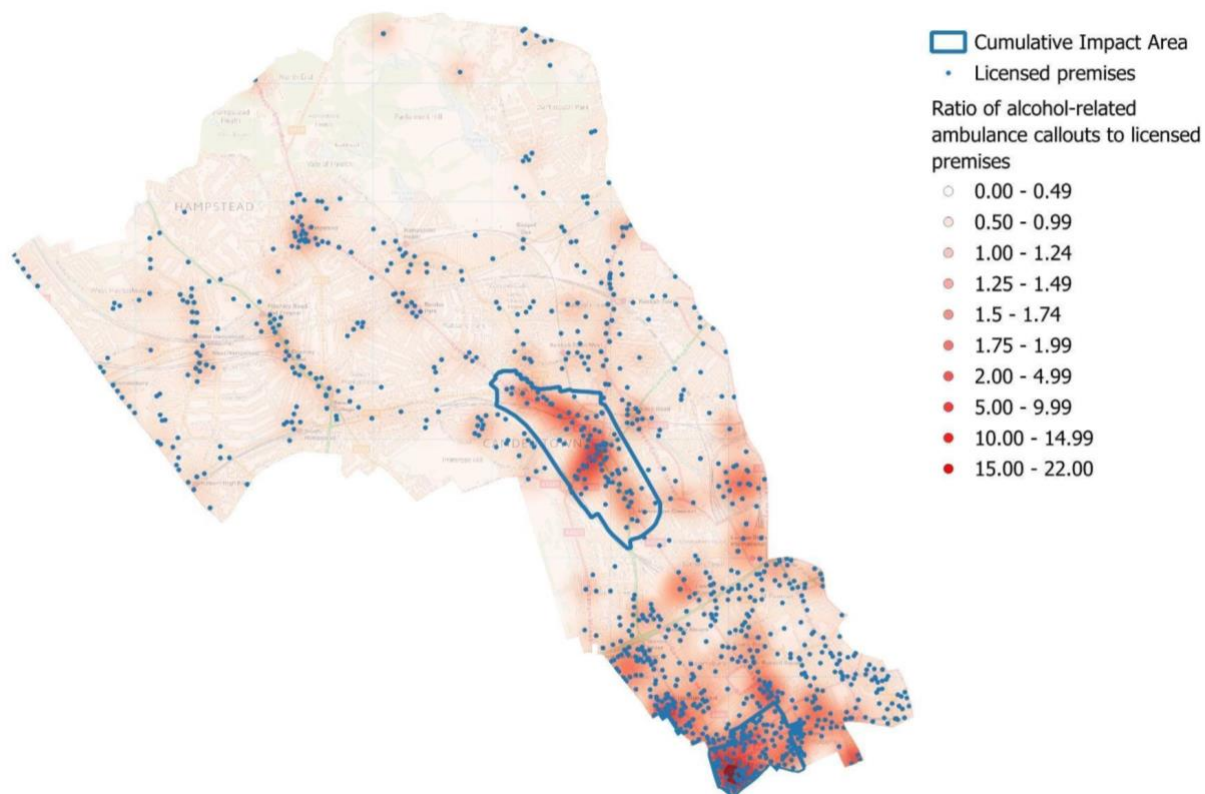
MSOA	No of premises	AR Callouts 2019-22	Premises per ha	AR callouts per ha
Seven Dials CIA	253	420	7.4	12.2
Camden Town CIA	273	1085	3.0	12.0
E02000189	63	250	2.1	8.5
E02000193	404	802	3.7	7.4
E02000186	179	687	1.8	6.9
E02000191	213	436	3.3	6.7
E02000188	50	309	1.0	6.1
E02000187	110	549	1.1	5.7
E02000190	67	182	1.8	4.9
E02000192	88	197	2.0	4.6
E02000177	44	227	0.8	4.3
E02000184	57	273	0.9	4.1
E02000183	97	308	1.3	4.0
E02000172	42	182	0.6	2.7
E02000178	35	131	0.6	2.3
E02000180	30	113	0.6	2.3
E02000185	29	106	0.6	2.2
E02000175	82	147	1.2	2.1
E02000174	21	111	0.4	2.0
E02000168	65	118	1.0	1.7
E02000171	15	86	0.3	1.7
E02000176	17	64	0.4	1.6
E02000179	27	61	0.7	1.6
E02000173	48	91	0.6	1.2
E02000182	33	88	0.4	1.1
E02000181	6	52	0.1	1.0
E02000170	26	58	0.3	0.7
E02000169	13	54	0.1	0.5
E02000166	47	127	0.2	0.4
E02000167	63	82	0.3	0.4
LBC Total / Average	1971	5891	0.9	2.7

3.6.3.48. In summary, the two CIPs have a substantially higher density of alcohol-related call outs per hectare - around 12. This is 50% higher than the highest individual MSOA in Camden (8.5).

Correlation between outlet density and ambulance call outs: heatmaps

3.6.3.49. Heatmaps give a useful spatial overview of the tabular data. The map below shows the where the clustering of LAS alcohol-related callouts take place with the borough’s licensed premises placed over the top.

Figure 47. LAS call out density, layered with licensed premises locations, 2019-22



3.6.3.50. As per the previous table, the Seven Dials CIP area shows the greatest clustering of both premises and LAS callouts for alcohol, albeit these call outs are most densely concentrated in the south west (e.g. Charing Cross Road side) of the area. The area to the east of the CIP sees far fewer call outs.

3.6.3.51. Camden Town also has a high density of callouts, but this is very much along the High Street. The periphery of this CIP has often negligible amounts of LAS alcohol-related callout activity.

3.6.3.52. There are two other areas that received above average numbers of LAS callouts for alcohol related incidents. These 'warmspots' are to the north west of the Seven Dials CIP area. This is around Tottenham Court Road and the eastern side of Fitzrovia, and the other is around Kings Cross / St Pancras / Euston to the east of the borough.

3.6.4. Summary

3.6.4.1. In summary, there is a strong correlation between the geographical density of licensed premises operating beyond framework hours and the number of alcohol-related ambulance callouts. This is particularly true of the Camden Town and Seven Dials CIPs but also of Tottenham Court Road, the Euston / Kings

Cross / St Pancras area and around Lincoln's Inn Fields and Camden's part of this legal area of London.

- 3.6.4.2. This pattern is reinforced by the fall in alcohol-related ambulance callouts during Covid in 2020 when on-licensed premises were substantially shuttered.
- 3.6.4.3. However, the degree to which alcohol-related ambulance callouts fell when on-premises in Camden were closed was a long way from 100%, meaning those call outs that continued to take place have come from those consuming alcohol from off-licences and supermarkets delivery services (which may or may not have been bought within Camden) and at house parties.
- 3.6.4.4. It should be borne in mind that, overall, the number of alcohol-related ambulance callouts per month are not high, even pre-Covid.
- 3.6.4.5. In 2022, there appears to have been a significant and consistent fall in alcohol-related ambulance callouts in Camden. Whether this fall is permanent will be important to monitor in the context of the two existing CIP areas.

3.7. Noise

3.7.1. Introduction

- 3.7.1.1. Noise pollution, particularly when people are trying to sleep, is a significant health hazard. The World Health Organisation set guidelines for Europe for a maximum of 70db.
- 3.7.1.2. However, 70db is just a starting point. The physical and mental health harms created by noise are also highly context dependent. Certain frequencies, and the intent behind the noise, are areas less understood but increasingly understood to be critical factors in any health harms. These are all relevant to night-time economies in particular.
- 3.7.1.3. In cumulative impact areas, noise is one of the least considered and most difficult to measure public nuisance issues that may constitute cumulative impact when linked to clusters of licensed premises and their customers. Key noise factors are customers leaving a licensed premises or on moving between premises or to transport hubs. Increasingly this can also include food and drink delivery couriers.
- 3.7.1.4. It is important to set out that noise emanating from a specific licensed premises is not cumulative impact. This should be dealt with at the premises level through, in the first instance, mediation and then through the enforcement if mediation fails. Camden Council already follows this approach.
- 3.7.1.5. For the purposes of this study, cumulative impact noise can only be a public nuisance when generated by the customers or deliveries of two or more licensed premises where it is impossible to identify where an individual licence holder is at fault.
- 3.7.1.6. Crucially in Camden (like most boroughs) the council does not specifically collect noise complaints related to noise from customers on the street. The only way to acquire this data would be to ask residents who say they are suffering from cumulative street noise to diarise or record it. Whilst residents in Camden, like many boroughs, may have done this relative to certain premises, no study exists that could be used to underpin an assessment of noise cumulative impact.
- 3.7.1.7. Another source of data could be to introduce a new recording category for 'street-based noise' for the noise service to record, even if it would not warrant a noise officer visit. Presently this does not happen - complaints are only recorded against specific premises, which as noted above are not cumulative impact.
- 3.7.1.8. Therefore, noise data was sourced from the EHO noise team simply for the purposes of identifying where problem premises are. This may give us some

indication of where residents are suffering from non-cumulative impact noise pollution and thus where the night-time economy is at its most intense. It should be used as a guide only and not as evidence of cumulative impact.

3.7.2. Methodology

- 3.7.2.1. Data for commercial noise complaints recorded by the local authority between January 2021 and December 2022 was provided to the researchers for analysis.
- 3.7.2.2. The commercial noise complaints recorded by Camden, as in most local authorities, has limitations. For example, it doesn't show multiple complaints on the same day about the same location, as they are all coded to the first case reference. It is therefore impossible to understand how many complaints were received in any given night about the same premises, although it does enable an understanding of how many nights across the time period *at least* one noise complaint was made about the location.
- 3.7.2.3. This is important, particularly in the context of Seven Dials CIP, where some residents have objected to late licences based on noise disruption to sleep.

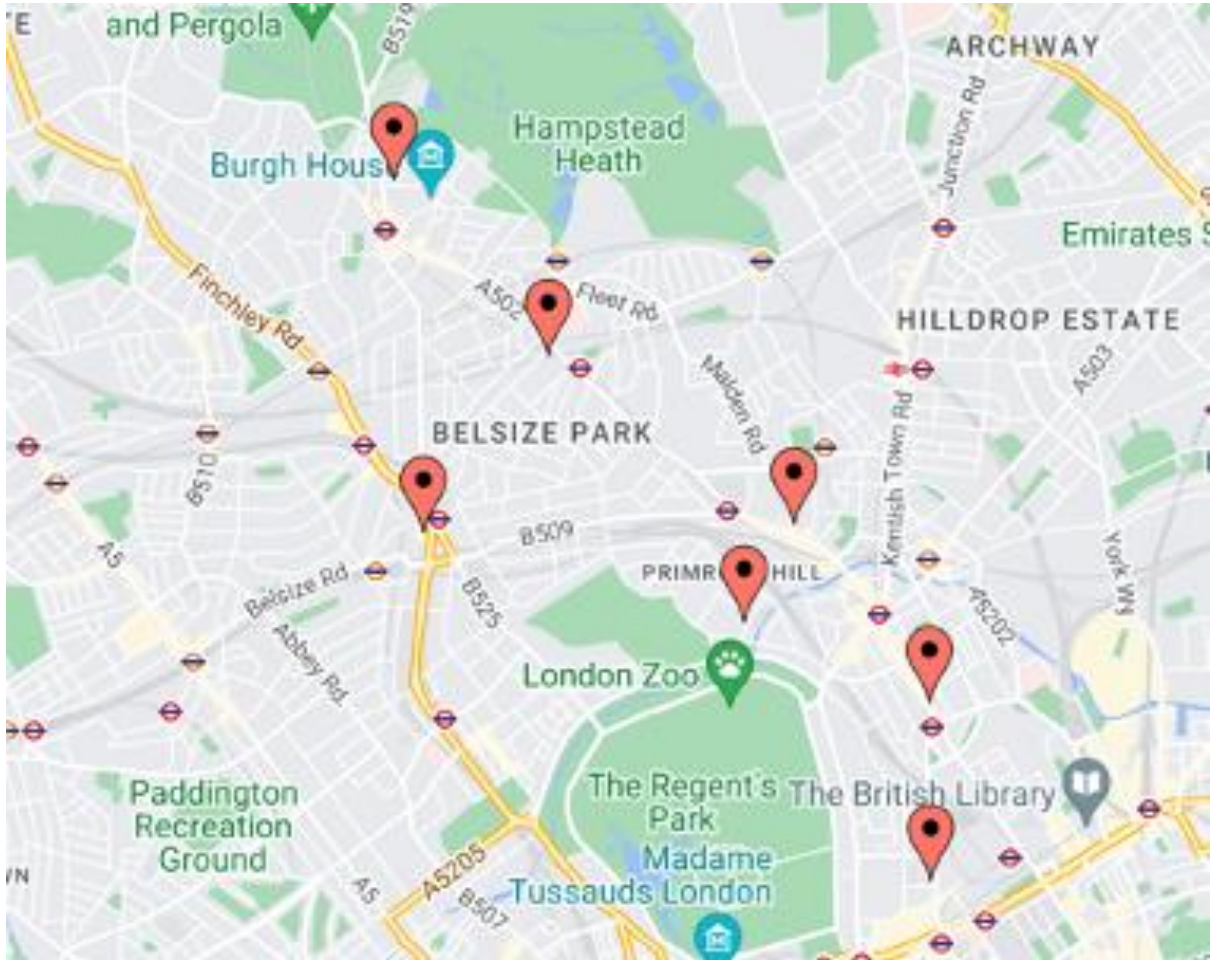
3.7.3. Findings

- 3.7.3.1. During the 24-month period, a total of 1,320 commercial noise complaints were reported. However, it should be noted that of these complaints, 345 (26.1%) complaint records did not capture the postcode information. Therefore, the figures reported for some areas may be higher than stated in this analysis.
- 3.7.3.2. Analysis of the data that did capture postcode information revealed that only 9 licensed premises locations in the borough attracted 10 or more noise complaints over the 24-month period. These postcodes are shown below.

Figure 48. Commercial noise/environmental health complaints Jan 2021 to Dec 2022

Postcode	No. complaints	Venue	CIP or Aol area
NW3 6HY	16 (11 about smell)	Swiss Cottage Editions (Deliveroo)	Swiss Cottage CIP
NW1 8ER	14	Spiritual Bar	Camden Town CIP
NW1 0JH	14	Jinli Chinese Restaurant	Camden Town Aol
NW1 8JR	13	The Albert Pub	Camden Town CIP
NW3 1JD	11	Duke of Hamilton Pub	N/A
NW1 3EL	10	Mestizo Mexican Restaurant	N/A
NW3 4QP	10	Fambula Garden	N/A

Figure 49. Map of locations of more than 10 commercial noise / environmental health complaints 2021-2022



3.7.3.3. The analysis and map show that the only significant levels of commercial noise complaints from licensed premises in Camden are concentrated in seven locations and relate to specific businesses that are not in close proximity to each other, and therefore could not be described as having a cumulative effect on noise. It may therefore be considered more appropriate to manage these issues through a targeted, partnership approach that tackles the specific causes of these issues, rather than a blanket policy approach which penalises a larger number of businesses.

3.7.3.4. It is also important to note, however, that the actual figures for noise complaints in some areas may be slightly higher than what is reported here, due to missing postcode information.

3.7.4. Summary

3.7.4.1. There were only seven licensed premises locations with more than ten commercial noise complaints over a two-year period in LB Camden, one in the

South Hampstead/Swiss Cottage area of interest (16 complaints, with 11 being about smells) and three in the Camden Town CIP area (14, 14 and 13 over the two-year period), with the remainder located outside of the areas considered in this report.

- 3.7.4.2. None of the locations were in close proximity to each other, so this data does not present any evidence of cumulative impact from noise produced by licensed premises.
- 3.7.4.3. This is not to say that there is not a perceived noise issue by residents, just that the qualitative data captured within Camden Council's noise recording system does not support this.

3.8. Cleansing and environmental grime

3.8.1. Introduction

- 3.8.1.1. It is essential to residents, visitors and businesses that the streets of Camden are kept as clean as possible. Cleansing is a significant element of council resource related to the licensed economy, particularly the night-time economy (late night refreshment - spilt food and discarded packaging, urination, vomit, garbage bags kicked open by users) and to clear up street drinking detritus that would not be required if the licensed economy was not present.
- 3.8.1.2. Cleansing is a challenging area to disaggregate the take on the borough's service by users of the night-time economy, but the CIP makes a first attempt for Camden to do this.

3.8.2. Methodology

- 3.8.2.1. The Camden Environmental Services examined its staff rota for 2022 to identify the additional staff hours required to support the night-time economy and cleansing relative to street drinking detritus removal. Unlike many night-time economy areas with BIDs, the BIDs in Camden do not appear to provide a supplementary street cleansing service and it is solely the council that provides this function.

3.8.3. Findings

- 3.8.3.1. The largest additional requirement placed on Environmental Services by the licensed economy is the need for additional cleansing of Seven Dials and Camden Town due to the impact of the night-time economy. Specific tasks include additional street cleansing in the early mornings to remove street-based detritus from night-time economy users and the requirement to empty litter bins that are fuller than in other areas with little or no night-time economy.
- 3.8.3.2. It should be noted that the environmental street cleansing teams are out from 6pm to 10am regardless of the night-time economy and this cost for dealing with the day and evening economy has not been considered here as it is too complex to disaggregate.
- 3.8.3.3. Service records show that, on average, it takes two additional hours from one operative to bring the two CIP areas up to standard on Friday, Saturday and Sunday mornings (over and above the standard cleansing that would be undertaken on a weekday).
- 3.8.3.4. If the two CIP areas did not take as long to clean, the cleansing operative could be cleaning other areas of the borough. Thus, there is a *fiscal* cost and an *opportunity* cost.

- 3.8.3.5. A cleansing operative costs Camden £17.26 outside of core hours (the service is contracted to Veolia). The operatives' additional hours are between 6am and 8am in these two areas on these three days of the week (Friday to Sunday). Thus £17.26/hour for the additional operative, is for 2 hours, 3 days a week, 52 weeks a year.
- 3.8.3.6. Therefore, annually in each CIP area it costs Camden: £17.26 x 2 hours x 3 days per week x 52 weeks = £5,385.
- 3.8.3.7. For Seven Dials and Camden Town Camden Cumulative Impact Assessment areas combined, this equals an annual additional early morning cleansing cost of £10,770.
- 3.8.3.8. The council has also detailed an additional cleansing operative for three hours daily to tackle the impact in Camden Town and Seven Dials of the licensed economy during the day and early evening.
- 3.8.3.9. This additional service equates to £11.51 (daytime cleansing operative cost) x 3 (hours) x 7 (days) x 52 (weeks) and thus a total of £12,567 for each area.
- 3.8.3.10. Taking the £12,568 per area annually and multiplying this for both Camden Town and Seven Dials, the annual additional cost for evening cleansing is £25,137.
- 3.8.3.11. The Camden Environmental Team therefore estimates that the total (minimum) impact for the additional cleansing for the licensed and evening / night-time economy in Seven Dials and Camden Town combined over a typical year is £35,908.
- 3.8.3.12. The overall annual cleansing budget for Camden is £16.7m. This is broken down into £10.7m for street cleansing and £6.0m for litter bin emptying and street sweeping etc. (The totals do also include cleansing provided for markets, parks cleansing, fly tips, winter maintenance, graffiti etc.) As such the additional burden of cleansing the two existing CIP areas is a negligible figure in terms of the overall spend (around 0.2%).

3.8.4. Summary

- 3.8.4.1. Overall, the council provides additional resources for cleansing the two existing CIP areas, both first thing in the morning and during the evening. However, this remains a small percentage of the overall budget for cleaning the borough's streets.

3.9. Street drinking

3.9.1. Introduction

- 3.9.1.1. Street drinking and street drinkers can be a significant source of cumulative impact. Firstly, this can be in terms of public nuisance (blocking pathways, street drinking detritus - often linked with drug taking paraphernalia, noise in parks and other public places, aggressive begging). Secondly, it can also be in terms of crime and disorder (fighting amongst street drinkers, public place urination, aggression towards other members of the public). Thirdly, it can affect feelings of public safety, i.e., the impact of the first two on how residents and visitors feel when out and about in Camden.
- 3.9.1.2. There are two main types of street drinking. The first is by those who have serious alcohol (and drug) dependency issues and who may be rough sleeping, homeless or have a street-based lifestyle.
- 3.9.1.3. The other source can be those using the borough's night-time economy who are 'pre-loading' (drinking before going out) or 'side-loading' (drinking between venues to save money on drinks prices once inside venues).
- 3.9.1.4. The challenges with the latter are that they often leave large quantities of bottles which are both a litter nuisance (and require removal by the cleansing services) and which can be a significant health hazard when smashed. In terms of crime and disorder, discarded bottles can also be used as a weapon.

3.9.2. Methodology

- 3.9.2.1. The researchers interviewed the police support officer for street-based individuals and other council officers - e.g. from the Parks Team, to understand where the street drinking hotspots were located in Camden. These were then mapped against off-licence locations against certain crime types and locations of known street drinking hotspots. (Street drinkers with street-based lifestyles tend to buy alcohol close to where they drink it, often within 100 metres).
- 3.9.2.2. It is important to note that not every street drinking hotspot is known to the police and council parks team. Based on the researchers' experience elsewhere, there are likely to be a number of other smaller and/or more hidden hotspots. Those shown below tend to be those that are most high profile, create the most challenges and require the greatest attention to detail for cleansing and detritus removal.
- 3.9.2.3. As well as the known sites, the researchers visited other key public spaces during the day when on observation fieldwork duty to understand whether there are sites that appear to be unknown to the council.

3.9.3. Findings

3.9.3.1. Below are the sites identified by the council and MPS as regular street drinking hotspots.

Figure 50. Known street drinking hotspots in Camden

	Camden Council / MPS Hotspot	Street drinkers	Street drinking detritus
1	Crabtree Fields	No	Yes (moderate)
2	The Warren	No	Yes (minimal)
3	Whitfield	Yes	Yes
4	St Giles' in the Fields Churchyard	No	No
5	St Andrew's Gardens	No	Yes
6	Argyle Square	Yes	No
7	Camden Gardens	No	Yes (minimal)
8	College Gardens	No	Yes (minimal)
9	St Martin's Garden	Yes	No
10	Harrington Square	Yes	Yes (minimal)
11	St Benet's Churchyard	No	No
12	Falkland Place	No	No
13	Kilburn Grange	Possible	Yes (moderate)
14	Lincolns Inn Fields	Yes	No
15	Tavistock Square	No	No
16	Bloomsbury Square	No	No
	Sites visited by researchers	Street drinkers	Street drinking detritus
A	Bedford Square – No (closed)	No	No
B	Russel Square – No	No	No
C	Woburn Square – No	No	No
D	Gordon Square – No	No	No
E	Brunswick Square – No	No	No
F	Coram Field – No (closed)	No	No
G	Vernon Square	Yes	Yes (moderate)
H	St Pancras Church – No	No	No
I	Oakley Square – No	No	No

3.9.3.2. The headline finding is that the hotspots are generally very well cleaned by the council. In the researchers' experience of studying street drinking in other boroughs, the standard of street drinking detritus removal and general cleanliness is exceptionally high.

3.9.3.3. Of the 16 known sites, only six had street drinking detritus anywhere within them at the time of visit. And of these, four were minimal (the odd bottle or can by a bench) and only two had more than a few cans or bottles (moderate).

- 3.9.3.4. The researchers visited another nine sites whilst observing in the area as part of their wider observations (A to I). Of these nine 'control' sites, only one had any notable street drinking detritus - Vernon Square in the Kings Cross area.
- 3.9.3.5. As is the researchers' experience, the majority of street drinkers observed were not causing issues, with only one set of drinkers behaving aggressively towards the public and passers-by or creating an unsafe feeling environment/public nuisance.
- 3.9.3.6. It is important to note that this research is a snapshot in time. The persistent evidence of cleansing required by the Council and the outreach work being done by the police street population officer is evidence that there is a problem in the borough, but that the council's response is effective and limits the impact of the problem on visitors and residents.

3.9.4. Summary

- 3.9.4.1. Some street drinking does take place in the borough and can sometimes be problematic in terms of the behaviour of street drinkers to each other and to other members of the public. However, compared to other boroughs, the problem is relatively limited.
- 3.9.4.2. Camden Council has an effective cleansing regime with its contractors to ensure that street drinking detritus in parks and public spaces is addressed before it reaches a critical mass. Again, this is not the same with all London boroughs.

3.10. Licensed premises

3.10.1. Background

- 3.10.1.1. The following section sets out the number of licences currently in operation in the borough and within the two CIP areas of Seven Dials and Camden Town.
- 3.10.1.2. Originally, it was intended to apply a unique approach to verifying the opening hours being used by a premises (not just its authorised hours) and this was to be carried out by Camden's licensing and enforcement officers by visiting every premises in the borough. The purpose behind this innovation was to collate even more up-to-date information than is captured by the council's licensing register and which would be of use to the council and partners in planning and its evening and night-time strategy,
- 3.10.1.3. This process also intended to examine the use of outside space at licensed premises, social responsibility standards of licensed premises and customer age/gender profile. The review was also intended to consider whether a particular premises type contributed positively or negatively to the ENTE strategy objectives of safe, inclusive, diverse, and celebratory environments.
- 3.10.1.4. However, due to resource issues within Camden Council's licensing team in 2023, this was not possible. However, the researchers do recommend that this is a worthwhile future exercise and that, should the council be able to secure the resources, it would benefit both future iterations of the licensing policy and measuring the impact of the council's concurrent evening and night-time economy strategy and its aims to diversify the borough's ENTE.

3.10.2. Methodology

- 3.10.2.1. It is worth noting that a *lapsed* licence does not mean a premises cannot continue to operate as a legal but unlicensed venue (e.g., a restaurant not now serving alcohol) or seeking to operate again as a licensed venue in the future.
- 3.10.2.2. This licence total does not include gambling premises (unless they have an alcohol or entertainment licence, e.g., a casino). Likewise, food premises, unless they have an alcohol or entertainment licence, are not included. In the case of takeaways, these are only classed as licensed premises if they have a late-night refreshment (LNR) licence for the sale of hot food or hot drinks between 11pm and 5am.
- 3.10.2.3. It is worth noting that there are many restaurants in Camden that *do* offer takeaway hot food, but cease trading before 11pm, being either licensed or unlicensed for alcohol and / or entertainment. Whilst these do *not require* a licence for LNR, problems may still occur around their takeaway service.
- 3.10.2.4. The total number of licences also includes all off-licences but does not duplicate the on-premises licence of, for example, a pub that can offer off-sales.

3.10.3. Findings

Overall number and type of premises

- 3.10.3.1. In September 2023 there were 1,712 licensed premises in Camden. Duplicates, suspensions or lapsed licences have been excluded. This also does not include temporary event notices.
- 3.10.3.2. The rate of lapsed licences and suspensions has been higher than normal, which reflects national trends, brought about through difficult trading conditions due to Covid, the cost-of-living crisis and the associated financial hardships for the licensed industry.
- 3.10.3.3. This figure of 1,712 for 2023 includes 464 premises located in the Camden Town CIP area and 361 located in the Seven Dials CIP area.

Figure 51. Licensed premises clustering across LB Camden

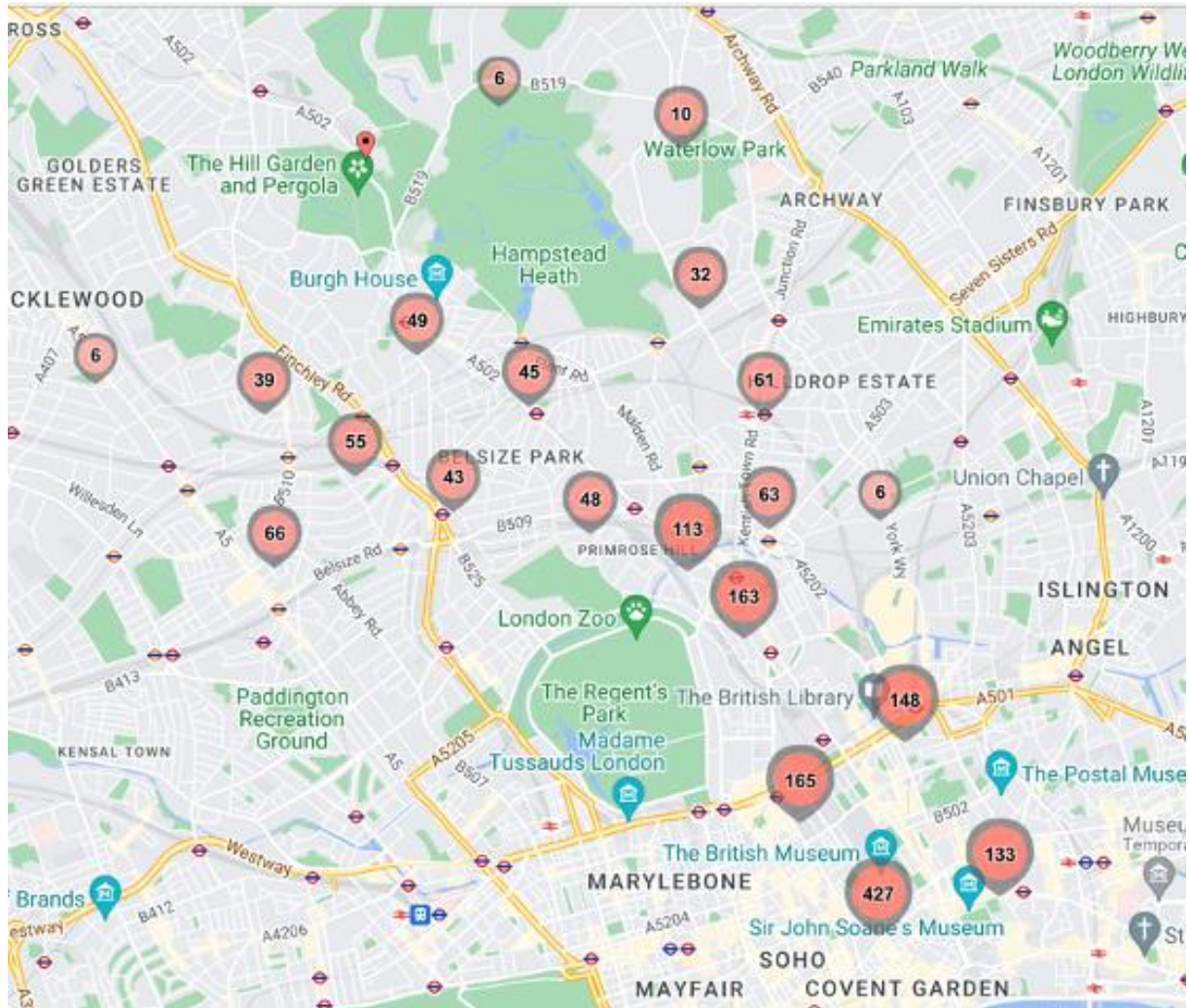


Figure 52. Licensed premises clustering around Camden Town CIP Area

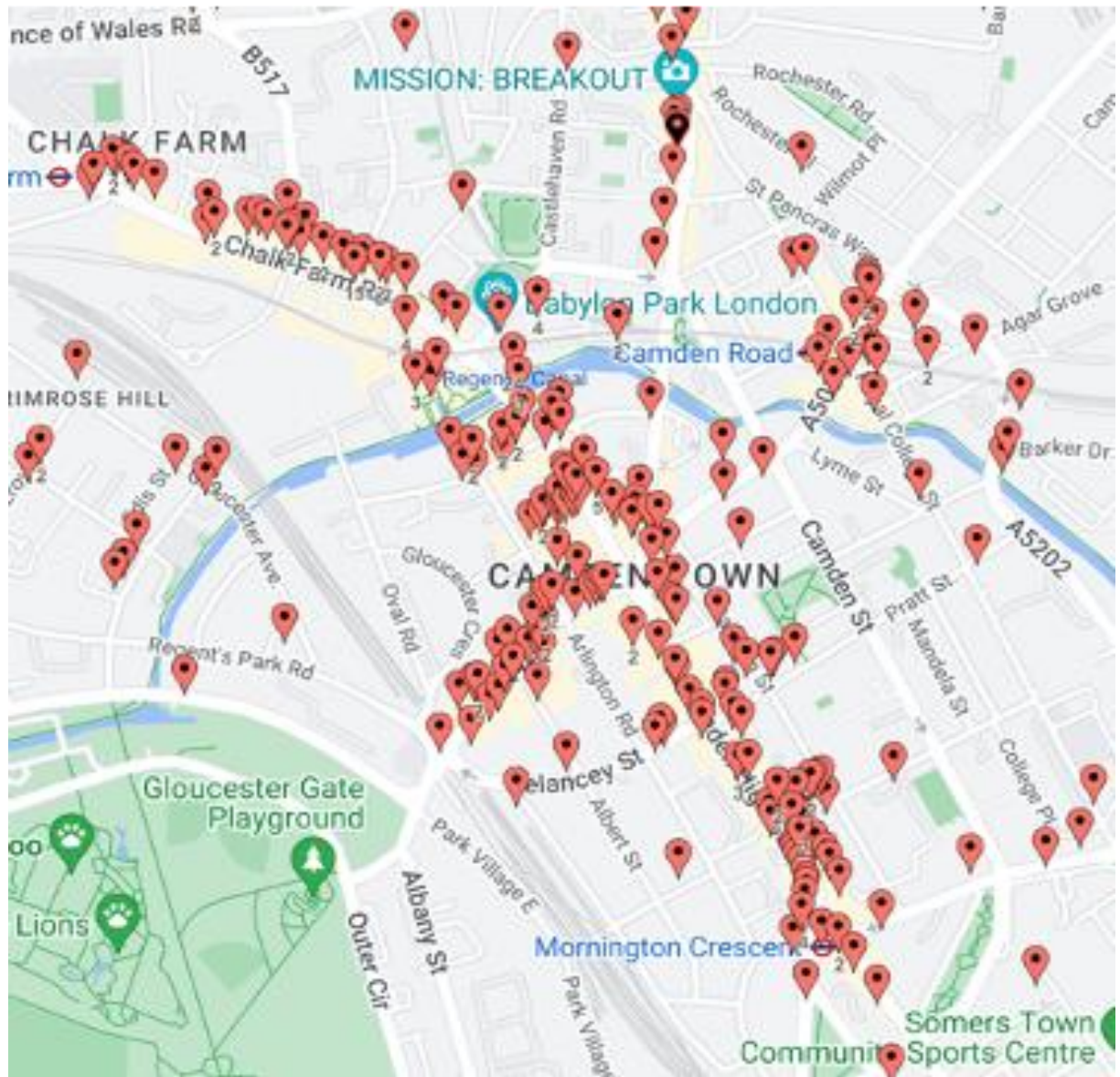


Figure 53. Licensed premises clustering around Seven Dials CIP Area

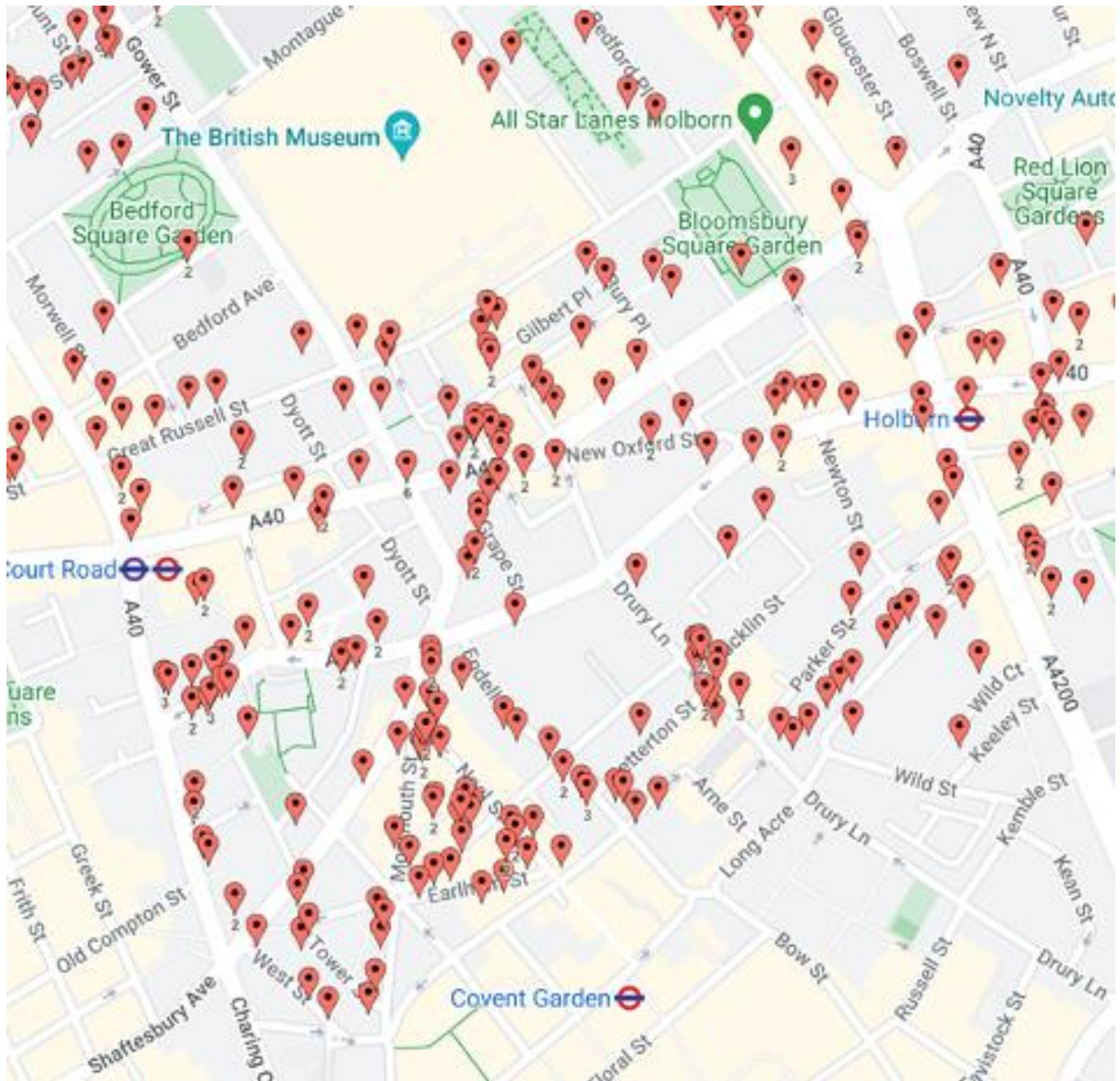


Figure 54. Licensed premises clustering around Fitzrovia area of interest

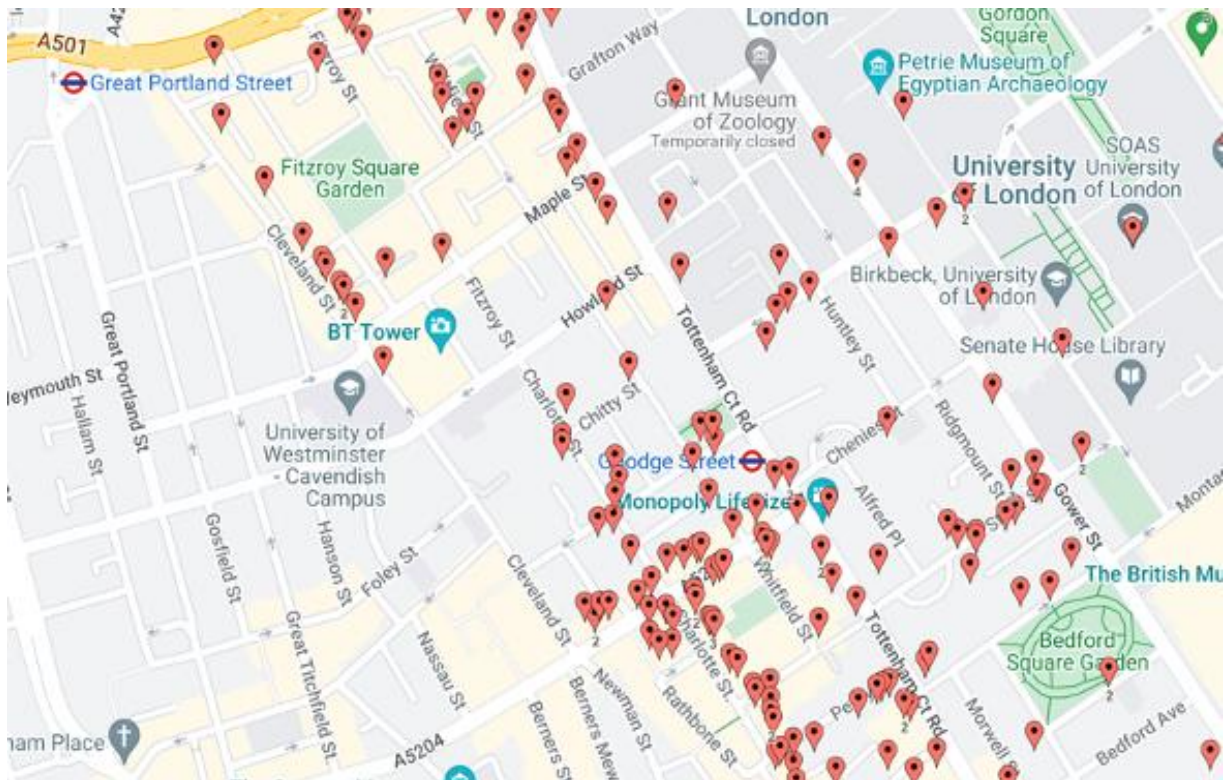


Figure 55. Licensed premises clustering around King's Cross/St Pancras/Euston area of interest

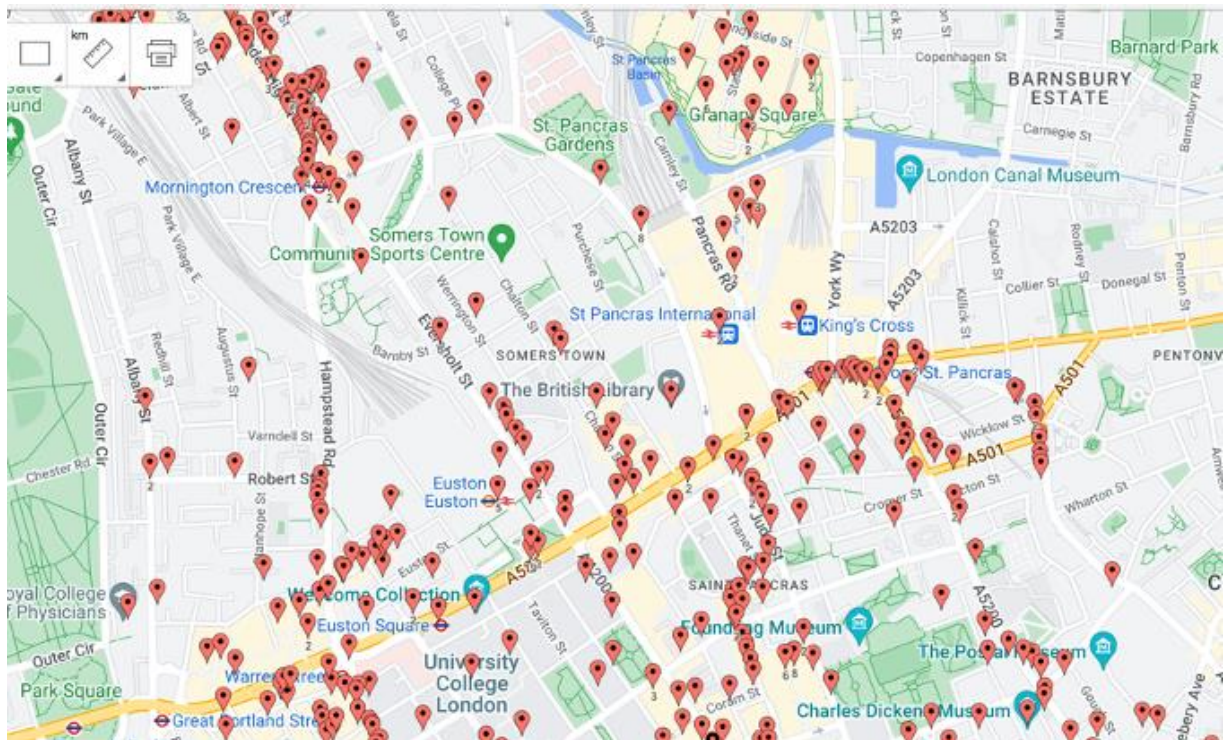


Figure 56. Licensed premises clustering around South Hampstead/Swiss Cottage area of interest

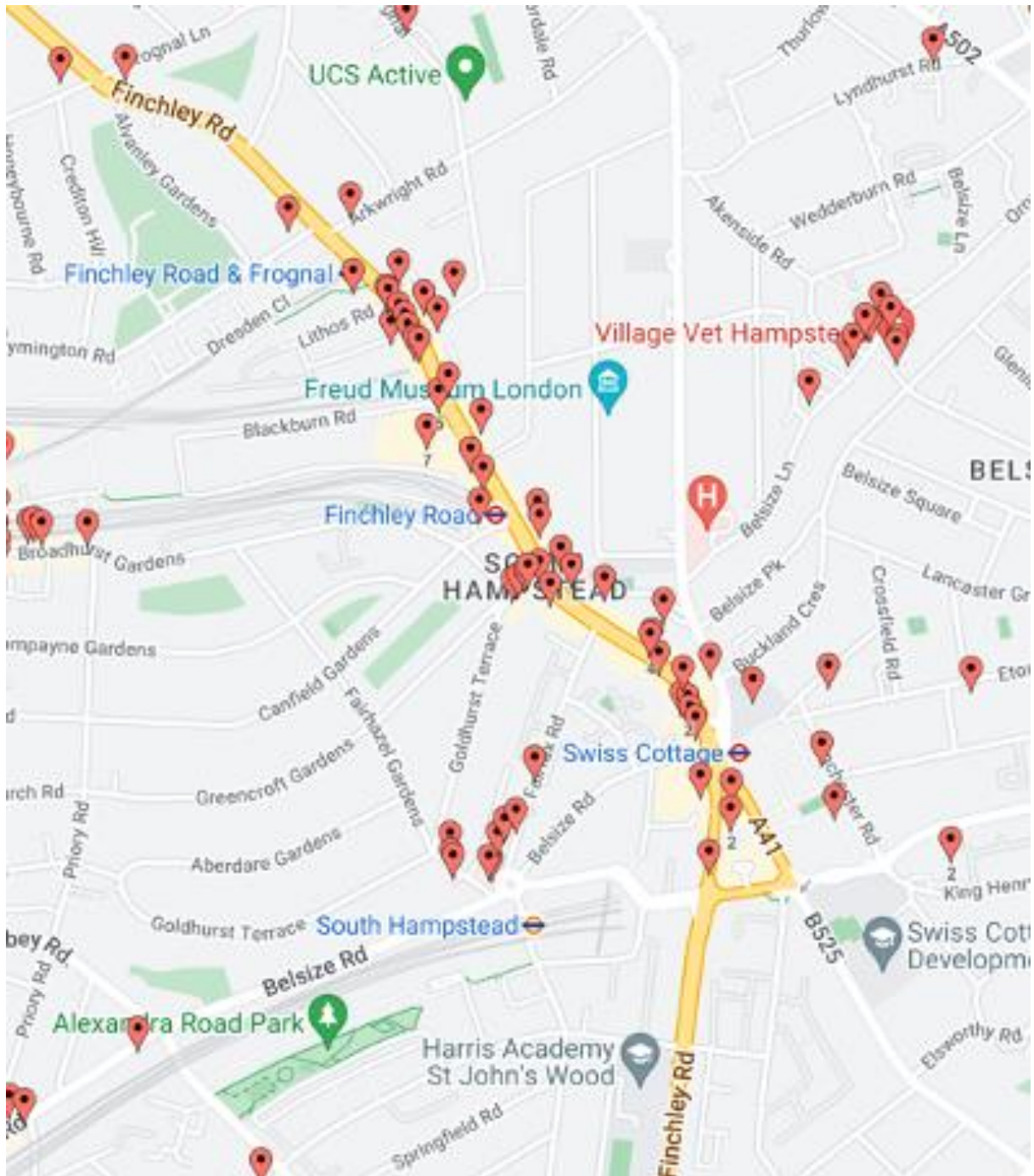


Figure 57. Licensed premises clustering around Kilburn area of interest

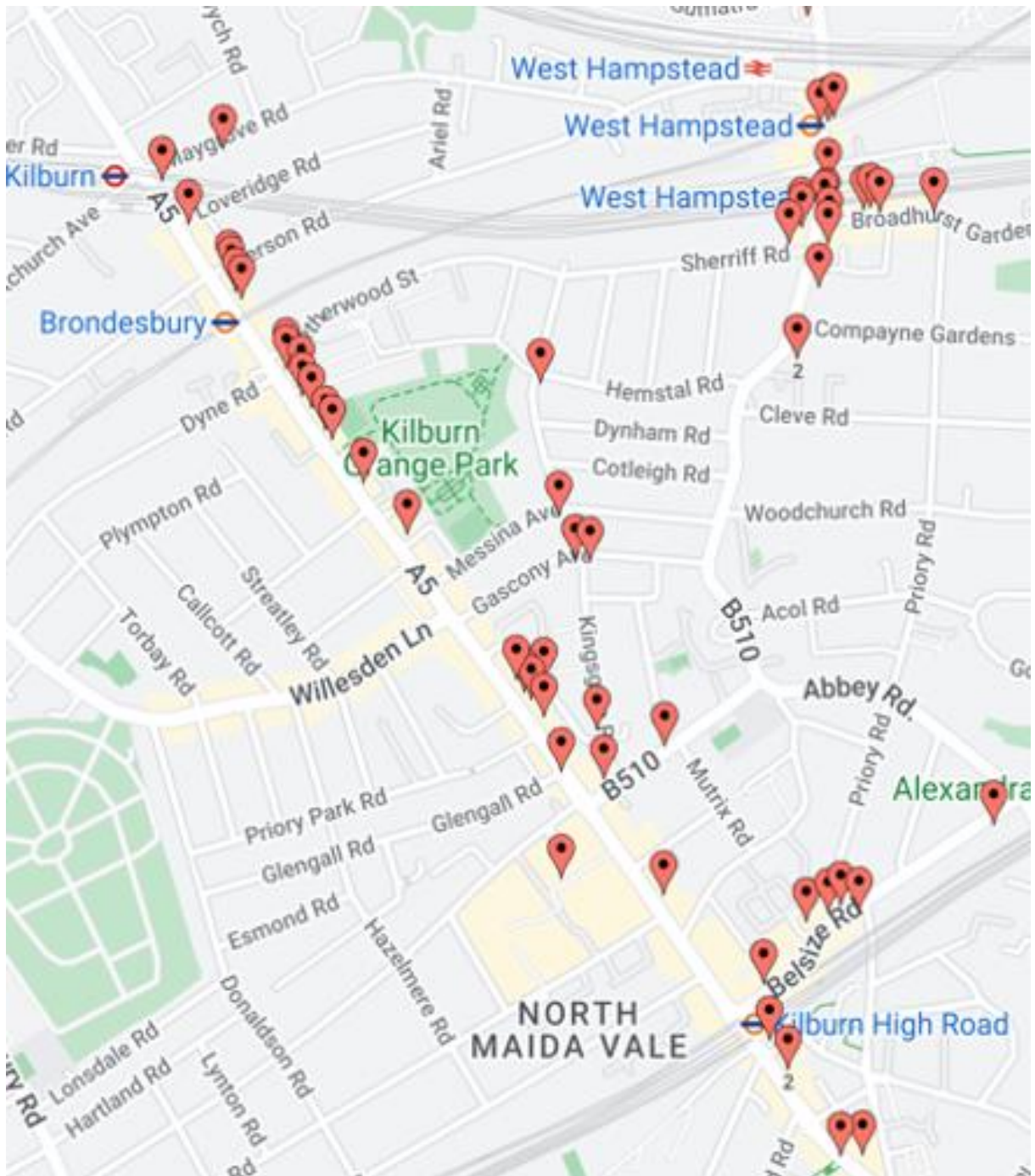


Figure 58. Licensed premises clustering around Kentish Town area of interest

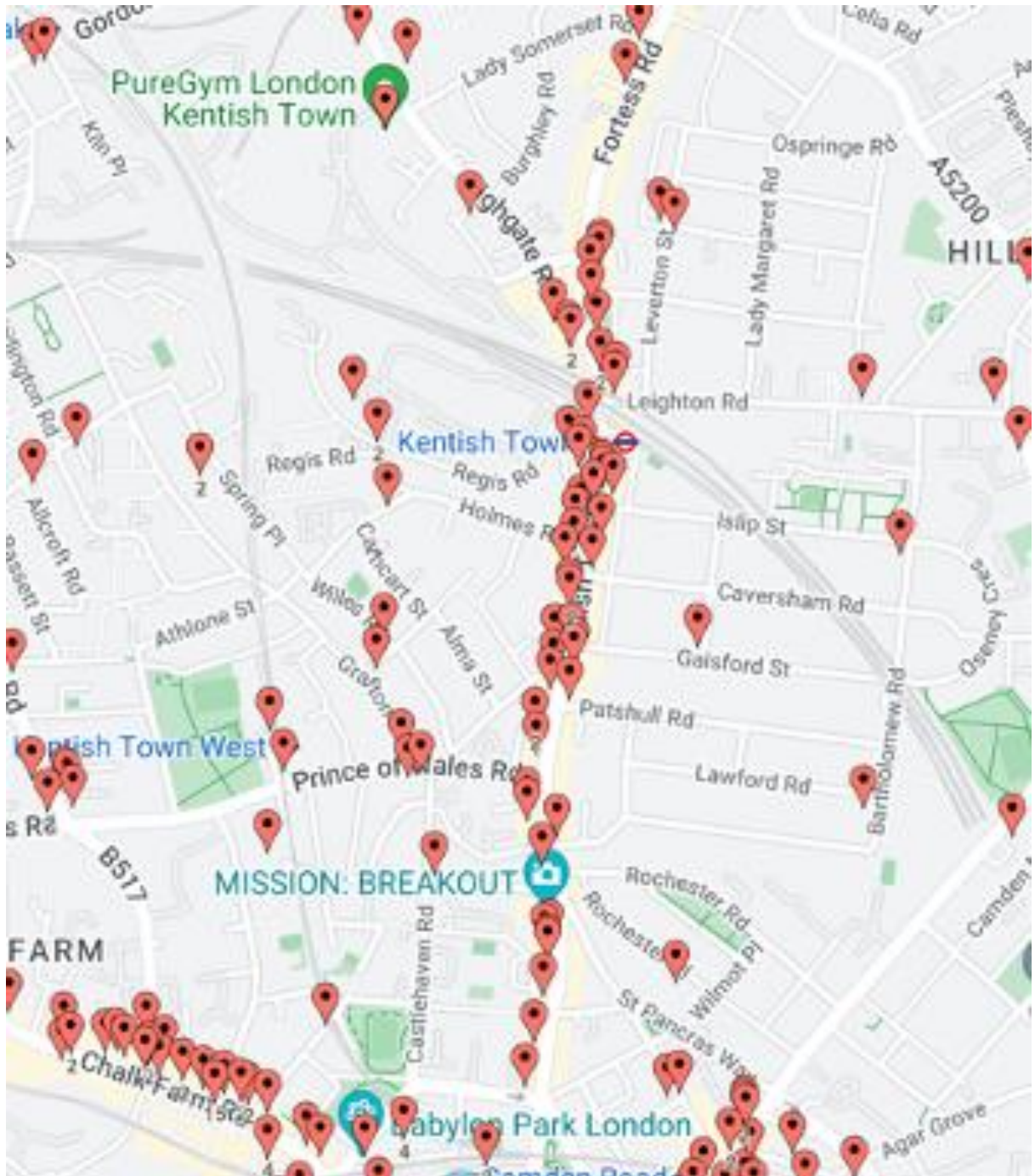


Figure 59. Breakdown of premises numbers by type 2023

Premises Type	2023	% of 2023
E38 Restaurant/Cafeteria (Alcohol)	591	34.5%
E36 Public House	276	16.1%
E35 Off Licence/Wines & Spirits	251	14.7%
E39 Other	162	9.5%
E30 LA2003 Premise	93	5.4%
E37 Restaurant/Cafeteria (no Alcohol)	85	5.0%
E34 Hotel	74	4.3%
E20 Night Club	26	1.5%
E33 Park/open space	26	1.5%
E40 Educational Building	25	1.5%
E11 Concert Hall/Live Music	20	1.2%
E25 Theatre	19	1.1%
E08 Cinema	15	0.9%
E10 Community Centre/Church Hall	11	0.6%
E09 Members Club	10	0.6%
E18 Museum	9	0.5%
E47 Serviced apartments	7	0.4%
E41 Sex Entertainment Venue	3	0.2%
E01 Amusement Arcade	1	0.1%
E02 Art & Craft/Models	1	0.1%
E12 Dance School/Studio	1	0.1%
E16 Library	1	0.1%
E43 Gambling - Betting Shop	1	0.1%
E44 Gambling - Bingo	1	0.1%
E45 Gambling - Casino	1	0.1%
F29 Restaurant/Cafe (Non-Licensed)	1	0.1%
F99 Newsagents/Tobacco + Fireworks	1	0.1%
Blank/Unassigned	12	0.7%
TOTAL	1.712	100%

3.10.3.4. 'Other' is a broad category including the following types of licence: sports clubs, social clubs, public spaces, beauty services, works canteens, wedding venues, garden centres, offices and co-working spaces, wholesalers, shops (that are not off licences) and so on. There is no known evidence, either in Camden or elsewhere, that these sorts of premises contribute to cumulative impact.

Applications and variations analysis

3.10.3.5. The table below shows the number of new premises licence applications in the whole of the borough and in the two current CIP areas between 1st January 2017 and 8th December 2022. This was provided by the Camden Council licensing team.

Figure 60. New premises licence application data 2017-22

New Premises Licence	Whole borough	Camden Town SPA	Seven Dials SPA
In Progress	11	2	1
Partially Approved	55	17	19
Approved	632	143	73
Representation Received	1	0	0
Hearing Date Scheduled	12	4	0
Refused	14	2	3
Rejected	38	15	7
Withdrawn	63	9	18
Grand Total	826	192	121
% wholly or partially approved	83.2%	83.3%	76.0%
% refused or rejected	6.3%	8.9%	8.3%

3.10.3.6. This data demonstrates that in the borough, 83.2% of new premises applications were wholly or partially approved, compared with 83.3% in the Camden Town CIP area and 76.0% in the Seven Dials CIP area. Approval rates are therefore similar within the Camden Town CIP area compared with the whole borough, and only around 7% lower in the Seven Dials CIP area.

3.10.3.7. The table below shows the number of full variation licence applications in the whole of the borough and in the two current CIP areas between 1st January 2017 and 8 December 2022. This was provided by the Camden Council licensing team and only shows reliable data. The data quality has been assessed ONLY on the 'application outcome' category code. The accuracy is 99%.

Figure 61. Full variation application data 2017-2022

Full Variation Application OUTCOME	Whole borough	Camden Town SPA	Seven Dials SPA
In Progress	2	1	3
Partially Approved	12	2	16
Approved	228	59	3
Representation Received	2	2	1
Hearing Date Scheduled	2	1	6
Refused	7	2	0
Rejected	29	7	0
Withdrawn	36	6	0
Grand Total	318	80	29
% wholly or partially approved	75.5%	76.3%	65.5%
% refused or rejected	11.3%	11.3%	0.0%

3.10.3.8. This data demonstrates that in the borough, 75.5% of full variation applications were wholly or partially approved, compared with 76.3% in the Camden Town CIP area and 65.5% in the Seven Dials CIP area. Approval rates are therefore similar within the Camden Town CIP area compared with the whole borough, and only around 13% lower in the Seven Dials CIP area.

3.10.3.9. The table below shows the number of minor variation licence applications in the whole of the borough and in the two current CIP areas between 1st January 2017 and 8 December 2022. This was provided by the Camden Council licensing team and only shows reliable data. The data quality has been assessed ONLY on the 'application outcome' category code. The accuracy is 98.5%.

Figure 62. Minor variation application data

Minor Variation Application Outcome	Whole borough	Camden Town SPA	Seven Dials SPA
In Progress	10	1	1
Partially Approved	2	0	1
Approved	315	48	44
Refused	18	3	3
Rejected	42	4	2
Withdrawn	11	0	1
Grand Total	398	56	52
% wholly or partially approved	79.6%	85.7%	86.5%
% refused or rejected	15.1%	12.5%	9.6%

3.10.3.10. This data demonstrates that across the whole borough, 79.6% of minor variation applications were wholly or partially approved, compared with 85.7% in the Camden Town CIP area and 86.5% in the Seven Dials CIP area. Approval rates are therefore around 7% higher in the Camden Town CIP area compared with the whole borough, and only around 9% higher in the Seven Dials CIP area.

3.10.4. Summary

3.10.4.1. New licences were approved over 2017-22 at a similar rate in Camden Town CIP area to the borough average. It was slightly less in Seven Dials CIP area. The trend was the same for full variations. This is the reverse of what may be expected in CIP areas.

3.10.4.2. Minor variations were approved at a higher level (by around six to seven percentage points) in both CIP areas than the borough as a whole.

3.11. Public consultation and stakeholder interviews

3.11.1. Introduction

3.11.1.1. One of the driving principles of this review was to ensure that consultation was as broad and in depth as possible with the project team interviewing a wide variety of stakeholders. A total of 64 stakeholders were contacted and 43 interviews were conducted.

3.11.2. Methodology

3.11.2.1. A long list of around 50 stakeholders was developed between the Council and the research team. A small number of further interviewees were introduced by these initial 'gatekeepers' as the research process unfolded.

3.11.2.2. The final sample size for the interviews was 43 participants. This is a very large number and represents a significant commitment by Camden Council to engaging with those who may be affected by the CIPs and/or a stakeholder in the wider licensed economy.

3.11.2.3. The interviews comprised a mix of the following:

- Residents associations
- Community associations
- Business Improvement Districts
- Trade associations
- Pubs and bars
- Restaurants
- Land owners
- Licensing solicitors
- Local authority stakeholders
- Police
- Transport representatives
- Disability representatives

3.11.2.4. Input from several groups representing the LGBTQIA+ community was sought but not achieved.

3.11.2.5. The interviews were semi-structured, allowing for flexibility in the questioning process to enable the participants to provide detailed and relevant responses.

3.11.2.6. The interviews were all conducted online, and each lasted between 30 and 90 minutes. All the interviews were recorded, where participants were agreeable, and transcribed verbatim for analysis. They remain anonymised for the purposes of the research and only anonymised quotes are used to make both specific where the person cannot be identified.

3.11.3. Findings

3.11.3.1. Views about the borough and the night-time economy

All area commentary

- 3.11.3.2. None of the responsible authorities interviewed considered it necessary to publish a cumulative impact assessment in any area of the borough.
- 3.11.3.3. Residents in all areas where it was possible to interview residents were supportive of a cumulative impact assessment being published in their area, however in each case the reason given was to address existing issues, which a CIA is not able to do.
- 3.11.3.4. Many interviews cited standout premises in the borough, including The Curzon Cinema, The Roundhouse, and the O2 Forum Kentish Town, among others. There was a widely held view that it is important to retain Camden's heritage, for example protecting live music, the independent businesses and local culture.
- 3.11.3.5. There is a strong feeling that Camden is a real community which must be nurtured, and the value of the NTE should be promoted. For example, it is important to protect the area throughout the developments that are taking place (e.g., HS2). Cllr Simpson was recognised specifically by several stakeholders in relation to his business-friendly approach in this regard, for which interviewees were very grateful.
- 3.11.3.6. Many stakeholders held the view that arts and cultural venues, restaurants, independent small cafes, and restaurants and family-focused venues have a positive impact on the community, while late-night wet-led venues and refreshment venues, issues with the gig economy, and off-licences are perceived to have a negative impact.
- 3.11.3.7. The NTE offer in the borough is currently not accessible and representative of its community including residents and students, nor is it very diverse. *"If there is no solid offer made available in Camden it will lose its identity over time and people will not be attracted to the area."* - licensed premises operator. Stakeholders suggest that the borough is missing a small plate, wine and nibbles offer. In some areas the policies and approaches that are being applied do not encourage diversification. Many interviewees reported that encouraging a more diverse offer could help improve feelings of safety at night, as it would also encourage a more diverse audience that is less focussed on alcohol.
- 3.11.3.8. Drunk and disorderly individuals were reported to be an issue by the majority of resident groups across the borough. It was stated that these also added to feelings of being unsafe at night. These groups reported crime and ASB as an issue, with many stating that alternative activities for the young people responsible for some low-level issues could help reduce these issues. More

visible police presence was mentioned by many of the stakeholders interviewed, although resource challenges were also recognised.

- 3.11.3.9. Safety and feelings of safety at night across the borough was reported by many different stakeholders as an important ongoing priority for stakeholders to promote.
- 3.11.3.10. Noise was an issue mentioned by the majority of resident groups interviewed. Some licensed premises interviewed made reference to the fact that some noise complaints received were from individuals that moved into the locality recently, with the premises in existence before the residents moved into the area.
- 3.11.3.11. The interviews indicate that litter is a big issue across the borough and that public realm improvements are needed. "I think cleanliness needs to be at the heart of it because otherwise your town centres are not a place that people feel welcomed." - landowner. "There is loads of litter in Camden Town and it's just awful." - Camden Town resident.
- 3.11.3.12. There is a lack of public toilets open at night. There are also concerns about street urination and the need for premises to take more responsibility for cleaning their frontages.
- 3.11.3.13. Drug use on-street was reported by several stakeholders across all areas of the borough.
- 3.11.3.14. There is a need for better public transport, including improved wayfinding. Noise around public transport hubs, particularly at the end of the night, is a concern.
- 3.11.3.15. Stakeholders suggest that businesses should have a responsibility to get their staff home safely and public transport should be more flexible to reflect new trends.
- 3.11.3.16. Issues presented by food delivery drivers day and night were noted by stakeholders across all areas of the borough. These included noise, litter and street urination.

Specific items highlighted: Camden Town

- 3.11.3.17. The findings highlight the public perception that the offer in Camden Town has gone from being quirky and unique to becoming uninspired, mainly focusing on vertical drinking. *"I've lived here for about 22 years now and it used to be quirky. The market used to be quirky, you'd go into the market and there'd be different things. There were antique shops and things with products that were different and one-off type things. Now it's [Camden Town] just run down."* - Camden Town resident.

- 3.11.3.18. This view was echoed by other stakeholders who highlighted how Camden's NTE and licensed sector is an historically important part of the borough that should be protected. There are too many licensed premises, and the late-night offer is poor, leading to noise issues, aggressive begging and rough sleeping. It was expressed that Camden Town lacks a good restaurant offer despite it being a good place for unique restaurants to experiment with their menu.
- 3.11.3.19. An increased capacity of Camden Town station would be of benefit, as the transport hubs in Camden cannot cope with the volume of passengers passing through. In addition, TfL will shut down escalators in Camden Town station creating large queues on the street without any management system or communication. As a result, people go into local licensed premises seeking information and to use their toilets. It was reported that this seems to happen every weekend.
- 3.11.3.20. Street drinking was identified as an issue by a number of stakeholders, with the caveat that it has nonetheless improved compared to the historical situation.
- 3.11.3.21. Several stakeholders noted the positive activity around the safety of women at night in Camden Town and the benefits of this. The police support various approaches such as welfare and vulnerability training, and the Ask for Angela scheme.

Specific items highlighted: Seven Dials

- 3.11.3.22. While Seven Dials offers a strong food-led offer, it lacks a post-11pm offer due to the policy and framework hours. The borough's retail offer is on the decline, and staff and supply chain issues are affecting businesses. The offer is not diverse enough, and stakeholders suggest the need for more freedom to host events to increase diversity.
- 3.11.3.23. “[Seven Dials] has become very, very food focused because if you want to get a new licence in Seven Dials, you've essentially got to be a restaurant. So, there's a lot of restaurants which is a good thing. We like the restaurants, but there needs to be a bit more variety.” - Seven Dials based solicitors.

Specific items highlighted: Fitzrovia

- 3.11.3.24. There is a high-quality leisure and hospitality offer in Fitzrovia, although it is mainly food led. The area attracts few complaints from residents regarding individual premises. Concerns are related more to the growth in the number of licensed premises generally and the increased noise impact of customers leaving them, as well as those using the 'streateries'.

Licensing specific findings: licensees

- 3.11.3.25. Insights would be useful to help premises with planning, such as general expected passenger numbers from the main transport hubs of Euston, Kings Cross and St Pancras.
- 3.11.3.26. More visible policing was desired by the premises interviewed, and more notice of licensing meetings, which can be held at short notice presenting attendance challenges as rotas are planned at least two weeks in advance.
- 3.11.3.27. Pre-planning and information around big match days is very good from the police and licensing teams, with presence from both being visible and valued.
- 3.11.3.28. The impression by operators in Camden Town is that they are no longer being treated as a cumulative impact area, as many licences are being granted in that area.
- 3.11.3.29. The police in Camden Town used to issue monthly emails which were “unbelievably helpful”. These stopped when they were challenged by some operators who did not want their premises to be named in them.
- 3.11.3.30. It would be useful for the borough to publish more information about how the funds raised by the Late Night Levy are spent.
- 3.11.3.31. A Pubwatch group in the Euston area was mentioned as an aspiration.

Camden’s approach to licensing

- 3.11.3.32. A regular comment made was the need for any policy to strike a balance between the needs of businesses and those of residents. The Statement of Licensing Policy could include positive statements about what is welcome in the borough, to make investors feel welcome. “There should be a note in the policy to say we welcome inclusive and diverse premises.” - a BID CEO. Encouraging supporting representations would also be a positive, business friendly approach. “The policy should encourage responsible operators and be expressed in positive terms.” - Licensing solicitor.
- 3.11.3.33. The view was expressed by several interviewees that there needs to be clearer communication between planning and licensing departments. “If planning permission has been granted for a development which is then the subject of a licensing application, why should there not be a positive representation supporting the licence application from the planning authority (they are a responsible authority).” - licensing solicitor.
- 3.11.3.34. One licensing solicitor suggested that the council’s regeneration team should be involved in the development of the new Statement of Licensing Policy.

- 3.11.3.35. Several residents hold the view that Camden is too “generous” with granting licences, with one stating that the licensing authority applies conditions when it should instead consider not granting the licence at all.
- 3.11.3.36. Interviewees expressed that resourcing issues can result in “blunt instruments” such as framework hours being applied too rigidly, without full consideration of other factors such as the individual merits of an application or the positive track record of the applicant.
- 3.11.3.37. More discussion between stakeholders such as residents, businesses and statutory bodies was felt to be a helpful approach to addressing some of the issues and potential problems with licensed premises and the NTE. It was suggested that consultation with residents could be conducted to develop a uniform pool of potential conditions that is acceptable to all parties. It was also recognised that a holistic, partnership approach would be helpful, and that the responsibility for addressing the concerns in the borough should not rest on the licensing authority alone.
- 3.11.3.38. A resident commented: *“One change is councillors are more approachable and make more effort,”* citing an example of local councillors sitting on community groups.
- 3.11.3.39. Joint visits between agencies have been tried as an approach but has not always worked as well as intended.
- 3.11.3.40. It was suggested by several stakeholders that there is a need for greater collaboration between neighbouring boroughs, as in many cases a core night time economy location can straddle two areas, requiring a joined-up management approach. Seven Dials and Soho (Westminster Council) is a good example.
- 3.11.3.41. It was suggested that flexibility could be applied to the licensing approach to support recovery. “Planning policies have SPDs (Supplementary Planning Documents), licensing could benefit from something like this so that licensing can more rapidly respond to changes.” - landowner. Flexibility was mentioned by several interviewees, with policies and approaches to enable and encourage to “have a go” at different concepts and encourage innovation to help the borough diversify its offer.
- 3.11.3.42. One licensing professional commented that seasonality should be considered within the Statement of Licensing Policy.
- 3.11.3.43. Another reported that Deliveroo and other bike riders are causing complaints which the authorities are looking to control through conditions on premises licences, however it is difficult for operators to control the delivery operatives.

- 3.11.3.44. The framework hours applied were welcomed by some interviewees such as some resident group representatives, some of which reported a desire for these to be adhered to more stringently by the licensing authority. Other groups such as landowners reported that framework hours acted as a deterrent to potential investors, and it was suggested that they could at least be extended “to support business recovery”.
- 3.11.3.45. More localised, place specific approaches to licensing and wider challenges and issues would be welcomed by many of the stakeholders interviewed. This would create a targeted approach to problem premises, groups and individuals, rather than blanket policies that affect all businesses.
- 3.11.3.46. One stakeholder stated: “there’s too much of a focus on the application process and not on maintaining good management after this.”

Cumulative impact policy areas

- 3.11.3.47. The consensus from residents was that the cumulative impact policy areas should be retained.
- 3.11.3.48. The view from most other stakeholders was that it was not the correct instrument to address the opportunities for improvement that the borough has in terms of the night time economy and licensing related problems. It was also stated by several licensing professionals that CIP areas do not encourage proper consideration of the merits of an application.
- 3.11.3.49. Many of the interviewees with licensing expertise suggested that the purpose and function of a cumulative impact policy area is widely misunderstood by other stakeholders, and so the desire expressed to retain these is borne out of the desire to address issues which could more usefully be addressed through other means.
- 3.11.3.50. It was mentioned by landowners and licensing solicitors that there are examples of businesses choosing not to apply for a licence in the areas with the CIPs in place - they act as a deterrent to potential investors. *“Operators will ask about an area where they are considering the acquisition of new premises. When they are told that there is a cumulative impact policy in place, they go elsewhere unless they have a licence in the area which they can surrender.”* - licensing solicitor.
- 3.11.3.51. It was reported by the same stakeholder types that CIPs can be particularly challenging for independent operators, who have limited resources and are not able to challenge licensing policies.
- 3.11.3.52. It was reported that policies can foster a lack of innovation, as they can protect the existing businesses from healthy competition from new incoming licensed premises, which makes existing premises complacent and the offer feel “tired”.

“A cumulative impact policy merely maintains the status quo. It is a barrier to new ideas and competition. There is no pressure on existing premises to up their game.” - Licensing solicitor. Licensing solicitors cited examples of premises that either failed to gain a licence or obtained a licence with untenable conditions, causing them to fail as a business and close down, leaving a vacant premises.

- 3.11.3.53. It was mentioned by one interviewee that the CIPs have not been amended since the introduction of the night tube. Should the policies be retained or amended, this should be taken into consideration.
- 3.11.3.54. Most stakeholders except residents suggested that if the policies were retained, the areas should be reduced. Seven Dials in particular was believed to be far too big an area. Camden Town should be focussed more accurately around hotspot areas of concern. *“The licensing regime is sufficient without cumulative impact policies. It allows for the refusal of applications or conditions to be attached to a licence if sufficient evidence exists. All the necessary controls exist within the current legislation without the need for restrictive cumulative impact policies.”* - licensing solicitor.
- 3.11.3.55. It was also suggested by one licensing professional that if the special policies are retained, there should be an exemption created to provide for a special policy to be dis-applied if a development obtains planning permission prior to applying for a new licence. This would provide more flexibility.

3.12. Observation fieldwork

3.12.1. Introduction

- 3.12.1.1. Observation of the licensed economy is a method of triangulating what the empirical data shows and what stakeholders have also told the researchers about key issues that may be related to cumulative impact. It is a well-established research tool that has been used in previous cumulative impact research by Camden, Hackney, Westminster, and Hammersmith and Fulham amongst others.
- 3.12.1.2. Observation also provides insight into low level anti-social behaviour (that is not captured in official statistics).

3.12.2. Methodology

- 3.12.2.1. The process involves experienced field researchers observing the behaviour of customers, the operation of licensed premises and their staff, the impact on the public realm, and transport hubs and so on. In addition to seeking to understand any issues that might constitute cumulative impact, in this study the researchers also looked to identify areas where the council, police, businesses and partners could implement measures to support the management of the night-time economy in the two CIP areas (and more generally across the borough). These can be found in the considerations section.
- 3.12.2.2. Site visits to both existing CIP areas (Camden Town and Seven Dials) were undertaken on two nights each on weekend nights (one Friday and Saturday each). Single evening and night visits were also made to areas of interest, including Fitzrovia, Kings Cross / St Pancras / Euston, Kentish Town, Kilburn, South Hampstead / Swiss Cottage.
- 3.12.2.3. Known street drinking hotspots (provided by Camden Council and the Metropolitan Police Service) were also visited during the day to identify any activity or street drinking detritus.
- 3.12.2.4. The duration of the visits was dependent on the times that each location was predominantly operational until. For example, in Camden Town this was until 4am. And, albeit there is some activity here beyond this time, the majority of activity has concluded by around 3am with limited dispersal continuing afterwards (with the operation of a few premises and the Night Tube).
- 3.12.2.5. In Seven Dials / Covent Garden, despite the closure of most licences at 11pm, observations continued until after 2am due to the presence of a handful of 2am venues, to enable the researchers to examine the impact of customer dispersal on noise.

- 3.12.2.6. Other locations, such as Kentish Town, Kilburn and Fitzrovia ceased well before 1am, with very few exceptions.
- 3.12.2.7. Brief visits were made in the mid to early evening to Swiss Cottage / South Hampstead, Belsize Park and Primrose Hill for exploratory purposes. However, there was little, or no activity related to the licensed premises to report here that could realistically constitute cumulative impact.
- 3.12.2.8. Photographs of all relevant incidents, user behaviour, flashpoints, good practice and poor practice that took place were taken (where it was safe to do so) and notes were made throughout the observations.
- 3.12.2.9. The street drinking hotspots provided by the council and the Metropolitan Police Service were also visited for verification. It is important to note that street drinkers are known to be nomadic and rotate around these hotspots. So, whilst some street drinkers were observed, the numbers were limited. This is normal in this type of research.

3.12.3. Findings

Camden Town CIP Area

Observation session 1: Friday 24th / Saturday 25th February

- 3.12.3.1. The first night of observational fieldwork in Camden Town was conducted on Friday 24th February. The weather was dry and cold until it began to rain at 01:50hrs. The following observations were made.
- 3.12.3.2. Observations were made of the poor smoking area and queue management outside several premises on the High Street and overcrowding outside a different premises (name withheld) nearby at 21:32hrs. This forces passers-by (other visitors, residents etc.) into the road which is highly dangerous. Better queue management would address this.
- 3.12.3.3. Door staff at a late bar were observed laughing at an intoxicated woman stumbling down the street at 22:02hrs rather than intervening or offering help.
- 3.12.3.4. There was considerable evidence of street drinking and cannabis use on Inverness Street Market at 01:15hrs.
- 3.12.3.5. Public transport and tube stations were identified as hotspots for street drinking, and there was evidence of street urination, vomit and litter on the streets in Camden Town throughout the night.
- 3.12.3.6. It was clear as the night went on that there was a disjointed approach to waste management and litter in Camden Town. Earlier in the evening the streets were cleaned after the intense day trading session of shops and until around 21:00hrs the town was relatively clean.

- 3.12.3.7. There was no uniform police patrol presence (or street pastors type scheme) seen during night, and there was an increased presence of people with a street-based lifestyle and begging incidents as the night went on. They were mostly polite but occasionally some were aggressive.
- 3.12.3.8. There were multiple instances observed of attempted drug dealing throughout the night, with one dealer believing the researchers to be police officers and exclaiming “*welcome to Camden officers!*”, potentially highlighting a lack of respect perpetrators have for the police.
- 3.12.3.9. Public nuisance was observed from amplified busking at Camden Tube Station at 21:00hrs.
- 3.12.3.10. Crowding and increased drunken presence were observed in Camden Town from 00:26 onwards.

Observation session 2: Saturday 18th / Sunday 19th March

- 3.12.3.11. The second visit to Camden Town took place on Saturday 18th March (similar weather). It was slightly less busy overall than it was on the previous observation night.
- 3.12.3.12. The majority of the observations made on the previous visit were reconfirmed. This is important as it demonstrates that none were outliers and generally typical of Camden at night. In particular, those observations of the condition of the public realm and aspects such as queue management and the issues around the train stations were reinforced.
- 3.12.3.13. Most of the noise and public nuisance issues could not be attributed to licensed venues themselves, with multiple instances of amplified activity occurring at Camden Town Station throughout the night from buskers.
- 3.12.3.14. Street drinking and detritus left behind from night-time economy users was noticeably worse on the second night visit. Even in the early evening, around 16:00 (near Mornington Crescent Station) and late at night (on the Canal Towpath around 01:20hrs. Littering, including off-licence sales of alcohol vessels, was considerable.
- 3.12.3.15. Litter was once again a problem across Camden town, but street cleansing teams were observed early in the night, and it appeared to be somewhat better than the previous visit overall.
- 3.12.3.16. Multiple instances of crime and disorder were observed again, with attempted drug dealing being a common occurrence throughout the night.
- 3.12.3.17. An altercation was also observed on Camden High Street at 22:50hrs where it appeared a knife was drawn. Prior to this incident no police presence had been

observed across both audits. Once a passing police van was flagged and officers were informed (by the researchers) of what appeared to have happened, there was an increased presence of police vans throughout the night and officers on foot were observed questioning someone outside Camden Town Station at 00:53hrs.

- 3.12.3.18. From a diversity perspective, in Camden Town there was a clear lack of licensed premises catering for an LGBTQI+ audience, echoing some of the comments made in interviews about a lack of diversity in the borough's offer.

Seven Dials CIP Area

Observation session 1: Saturday 11th / Sunday 12^t March

- 3.12.3.19. The first date of observation of Seven Dials was Saturday the 11th of March. The weather was mostly dry and very cold with sporadic light rain throughout the night.
- 3.12.3.20. Queue management and dispersal is generally very strong throughout the area thanks to clearly well-trained door staff. There are a limited number of outliers where this is not the case.
- 3.12.3.21. Most notably, dispersal from a premises near Tottenham Court Road Station at 00:00hrs was very poor leading to large crowds accumulating, street drinking and widespread drug dealing and use occurring. NOx was being retailed openly and balloon sellers are using 5g chip and pin machines to sell to customers exiting premises in this area. There is a clear divide between the interior of the Seven Dials CIP area and the area on the periphery bounded by Charing Cross Road, which has much greater parallels to Soho.
- 3.12.3.22. On the whole, street drinking doesn't appear to be a major issue in most of the Seven Dials CIP area, there were a few instances where this was observed (Charing Cross Road) but it certainly seems less of a problem compared to other areas in the borough.
- 3.12.3.23. The public realm in Seven Dials is well maintained throughout the night, and litter, whilst still present, is not as prevalent here as in other parts of the Borough, e.g. Camden Town and Kings Cross. That being said, there still appears to be a disjointed approach to waste management and street cleansing with evidence of street urination still seen too.
- 3.12.3.24. The evening offer in Seven Dials is really strong but heavily food led and with little choice for users post-11pm.

Observation session 2: Friday 17th / Saturday 18th March

- 3.12.3.25. The second night audit of the Seven Dials was conducted on Friday 17th March, St Patrick's Day. The weather was mild, with sporadic light rain.
- 3.12.3.26. Seven Dials was busy most of the night due to St Patrick's Day, but venues had taken measures to prepare for this including hiring additional marshals and door staff and increasing the capacity of outside areas where possible.
- 3.12.3.27. As per the first audit, the management of licensed premises, including dispersal from them, appeared to be very strong. The same issues around dispersal at Tottenham Court Road Station were noted, with people loitering and high quantities of litter being present (it is likely that much of this is from NTE users from Soho and the Westminster part of the West End as there are far fewer fast-food venues in the Camden area).
- 3.12.3.28. One aspect noted as part of the audit was how the rain changed the area's user behaviour. Those drinking outside at premises scrambled to get inside and when this was full, they took their drinks off the premises in search of cover.
- 3.12.3.29. Street drinking was observed less during this visit; however, litter and street drinking detritus (including broken glass) was more present.
- 3.12.3.30. There were also more instances of street urination or evidence of this having happened as the night continued.
- 3.12.3.31. In terms of public nuisance, one of the main causes of noise throughout the night was the unlicensed rickshaws that were targeting custom from people leaving licensed premises.
- 3.12.3.32. Generally unlicensed taxis were not observed playing for hire, however there was one incident where an unlicensed taxi stopped to pick up two women before speeding off when they refused.

Kentish Town

Observation session 1: Friday 24th February

- 3.12.3.33. The audit of Kentish Town took place on Friday 24th February (Alternating circuits until midnight with Camden Town after which Camden Town became the focus); the weather was dry and cold throughout the night. Kentish Town was also visited on Saturday 18th March, when it was raining lightly on occasion, however there was nothing new of note compared to the first visit.
- 3.12.3.34. In the early evening at 18:45hrs, Kentish Town Road was busy and lively with lots of people and business activity.

- 3.12.3.35. By this time, it was already clear however that, whilst the mix of uses (hospitality, leisure, functional retail, community, health services) is excellent and there is a range of users of the Kentish Town Road, there was already a problem with the levels of litter on the street – both from customers and businesses.
- 3.12.3.36. Later in the night Kentish Town Road was much quieter, the pubs in the area were also relatively quiet on the whole. There was very little to note in the way of public nuisance or crime and disorder.
- 3.12.3.37. At 23:20hrs there was a group of men who had come from playing sports (identifiable through their clothing and sports equipment) who were being unreasonably loud. There was also a small amount of noise from a pub (name withheld) where there were people using the outdoor area. At this pub, a customer was also able to leave with an open bottle at 23:47. This same customer then proceeded to urinate in the street shortly after this.

Kings Cross / St Pancras / Euston:

Observation session 1: Sat 25th February

- 3.12.3.38. Saturday 25th February: Kings Cross. The weather was cold and dry, and there were many football fans present due to the Carabao Cup Final.
- 3.12.3.39. Several aspects were observed such as licensed premises and customers around them, off-licences and street drinking, public transport and tube stations, street scene, crime and disorder, public nuisance, and public safety.
- 3.12.3.40. There is a lack of any notable quality food and drink offer beyond fast food and off-licences in the area after 23:00hrs, despite many people.
- 3.12.3.41. There was a large queue outside of one premises in the Euston area which was blocking the pavement.
- 3.12.3.42. There was considerable begging, street urination, litter, and vomit on the streets,
- 3.12.3.43. There was a surprisingly limited police presence despite the large number of football fans dominating the public space, albeit the Carabao Cup Final was to take place the following day.
- 3.12.3.44. One of the main observations made on this audit was the high levels of casual street drinking and excessive litter because of this behaviour and the high footfall through the area. This was not just from the football fans but other users of the area's NTE. There were significant incidents of broken glass alcohol bottles identified on all streets around the area of interest, but particularly around Grays Inn Road and Pentonville Road. This became progressively worse as the night progressed with smashed glass on both the pavements and

the drainage channels of the highway. This poses a risk to pedestrians, cyclists and vehicles.

- 3.12.3.45. The Scala was not open on this first night, so there was no late-night offer.
- 3.12.3.46. The report also notes the presence of football fans and their chanting around the Kings Cross area.
- 3.12.3.47. The public realm was generally well-lit, and there were pop-up activities e.g. curling at Coal Drops Yard.

Observation session 2: Sun 26th February

- 3.12.3.48. Sunday 26th February (Additional Day), there was a visible police presence outside a premises on Chalton Street with 12 officers and 3 vans conducting liaison work.
- 3.12.3.49. Street drinking from football fans was still observed. There was still litter, particularly cans, but much less than before. The area was described as busy and bouncing.
- 3.12.3.50. Cleansing outside Kings Cross Station was good, but an electric junction box on York Road was still littered. A British Transport Police officer was seen inside a fast-food restaurant near Kings Cross Station where two people were observed drinking.
- 3.12.3.51. There was police presence at Kings Cross, and evidence of street urination was observed at Kings Cross Underground. Football fans were seen coming out of one pub chanting, with a prominent police presence. There were reports of unruly behaviour and chanting outside pubs near Euston and Kings Cross Station.

Fitzrovia

Observation session 1: Friday 10th March

- 3.12.3.52. Friday 10th March: Fitzrovia. The weather was cold and dry throughout the night.
- 3.12.3.53. The area has a diverse range of restaurants and licensed premises. The Tottenham Court Road and Whitfield Street areas were slightly crowded, but there was no noise build-up on Goodge Street.
- 3.12.3.54. Evidence of street drinking was found on Coalville Place, Tottenham Court Road and Hanway Street.
- 3.12.3.55. One pub's customers had left glassware in the 'streatery'.

- 3.12.3.56. A lot of places closed at around 11pm, particularly pubs; one cocktail bar was open until 1am. The street scene was great, but the aesthetics of the streateries do not fit with the quality of the rest of the environment.
- 3.12.3.57. The Whitfield Gardens is an excellent space but was covered with litter, including some limited street drinking detritus.
- 3.12.3.58. Limited public nuisance noise emitted from the crowd that were drinking in the outside area of a pub and a group of three men were shouting on Rathbone Street.
- 3.12.3.59. The lighting in Whitfield Gardens helps create a sense of public safety.

South Hampstead/Swiss Cottage/Primrose Hill

Observation session 1: 11th February

- 3.12.3.60. The South Hampstead and Swiss Cottage area of interest was visited in the evening on the 11th of February, with additional observations of the Primrose Hill and Belsize Park area included due to their proximity to the main area of interest.
- 3.12.3.61. There is very little late-night activity in any of these areas and, as such the visit commenced at 7pm and was terminated at 11.30pm when most venues e.g., neighbourhood pubs had closed. There are some fast food (late night refreshment) premises in the main AoI which are both independent and chain (e.g. KFC, McDonald's and Subway) that do stay open later and in Swiss Cottage there is a Middle Eastern/shisha venue that trades into the early hours. However, there were no negative impacts observed relating to any of these premises.
- 3.12.3.62. The Swiss Cottage and Finchley Road area is predominantly a local neighbourhood high street, but one which is dominated by the A41 dual carriageway, and the leisure and retail offer is very much secondary to vehicular traffic.
- 3.12.3.63. The mix of uses are predominantly daytime with banks, personal services (gyms, hair stylist, beauty bars) and cafes, albeit there are some evening uses, including restaurants, interspersed between these daytime uses. There are many small national chain supermarkets with off-licence permissions but these close around 10pm to 11pm and there are very few independent off-licences of the type that tend to have later licences to sell alcohol.
- 3.12.3.64. On arrival at 7pm the area was reasonably busy and in a transitional period as locals were leaving the area via the underground stations (Finchley Road and Swiss Cottage). The street scene was extremely clean and stayed this way throughout the evening.

- 3.12.3.65. The researcher walked to the south of the area and observed venues such as the Old Swiss Cottage pub and the cinema. These two venues represent the natural southern boundary of this area in terms of licensed venues, after which the area becomes more residential as it moves towards central London.
- 3.12.3.66. There were no issues from any of the premises or their customers in this area. It is also worth noting that virtually all the pavements in this area are substantially wider than highways guidance and thus there was never any issue with congestion. It would take a massive uplift in users of the area at night to generate any issues of footway congestions. This is unlikely to happen.
- 3.12.3.67. At this point the researcher moved to Primrose Hill, observing here from 8.10pm to 8.40pm. The area is a mix of traditional and gastropubs and upmarket restaurants serving a predominantly local crowd of affluent individuals. The key road for licensed premises is Regent's Park Road, albeit there is a scattering of neighbourhood pubs on some of the side roads.
- 3.12.3.68. In summer this area is known for its outdoor seating and café culture but in February it was not possible to assess the impact of this as it was too cold for alfresco dining.
- 3.12.3.69. On the evening the researcher spent around 30 minutes in this location, and whilst the venues were all busy inside, there was no impact of the customers in the street, from shouting, screaming or even talking loudly when walking between venues or arriving and leaving.
- 3.12.3.70. Walking through to Belsize Park, a similarly affluent residential area, there are a similar number of premises here to Primrose Hill. Again, many are dispersed with two small clusters near to Belsize Underground Station on Haverstock Hill and then in the village centre around Belsize Lane and Belsize Terrace. Both locations have a mix of restaurants (mostly independent), the occasional pub and off licence. In both areas there was no sign of any negative impact by customers moving to or from the premises (which were busier in the village than on Haverstock Hill) and no impact on the public realm.
- 3.12.3.71. Moving towards South Hampstead and arriving just before 9pm a group of five men were observed shouting and entering the Overground station on Loudoun Road at 8.57pm. They appeared intoxicated but were the only intoxicated individuals observed up until this time.
- 3.12.3.72. In and around this area there was the occasional restaurant open on Fairhazel Gardens and Fairfax Road, but this area remained quiet on both this visit and the later return walkaround.
- 3.12.3.73. Statistics suggest that there is an elevated amount of crime and disorder issues around South Hampstead (albeit only relative to the other areas such as Swiss Cottage and Primrose Hill rather than busy NTE areas such as Camden Town

and Seven Dials) where levels are substantially higher. However, there was no evidence seen here to suggest that there are any significant issues linked to licensed premises. There are few late-night refreshment premises, no late-night pubs and bars nor many off-licences and mostly it appeared to be just locals using the restaurants. There was no litter, and the streets were well maintained.

- 3.12.3.74. At 9.15pm the researcher returned to Swiss Cottage and Finchley Road and observed this area for almost an hour. There were only three incidents of note. At 9.35pm group of six men who were clearly intoxicated singing rugby songs (there were rugby internationals on this day). They were walking along Finchley Road before disappearing into the Underground Station. At 9.56pm a man was seen shouting at his female partner in a highly aggressive manner. There was no violence, but it was extremely intimidating, and both appeared to be highly intoxicated. After three minutes they walked north along Finchley Road. At 10.01pm a man peeled away from a group of four other men who were shouting and clearly intoxicated. He urinated against the wall on the side road next to the HSBC building.
- 3.12.3.75. At 10:10pm the researcher repeated the round of observations as per the route noted above, returning to Primrose Hill and Belsize Park and then to South Hampstead. There were no further incidents to report. The areas were no busier than earlier in the evening and the streetscape remained clean and there was a convivial atmosphere in all three locations.
- 3.12.3.76. On returning to Swiss Cottage and Finchley Road at 10:55pm the researcher spent the remaining time observing the area. The only incident of note was a group of four intoxicated men and women emerging from Swiss Cottage tube station. They were loud and shouting at each other but did not use any of the areas. In relation to the fast food (LNR) premises located here, there were no issues (and all were still open). The area is simply not very busy at this time of night.
- 3.12.3.77. At 11.30pm, with the area quiet but for the people entering and exiting the two tube stations, the research was concluded.

Kilburn

Observations session 1: Saturday 12th February

- 3.12.3.78. The focal point of Kilburn is Kilburn High Road. It is a long high street (almost 2.7km). The western side is in Brent and the eastern side in Camden. The southern end of it progresses into Maida Vale in Westminster so the observations covered the stretch from Kilburn Underground station at the north and Greville Place in the south where Camden ends. There are three stations: one Underground (Kilburn) and two Overground (Brondesbury and Kilburn High

Road) serving the area. None were particularly busy or congested at any time during the observations.

- 3.12.3.79. For the purposes of this research, the area was observed in its totality because in the mind of most visitors it will be considered a single destination. However, the observations are clearly marked on which side of the road and thus which borough they took place in.
- 3.12.3.80. Kilburn High Road is an intense high street with a broad range of uses that encompasses both independents and national chains. Whilst having a strong daytime offer, licensed and gambling premises make up a significant part of the land use here and it is busy at nearly all times of the day, albeit quieter after midnight.
- 3.12.3.81. Post-midnight the key uses are fast food (late night refreshment) venues. It has a significant number of pubs, some on the corners with side roads (which are mostly residential). They vary from a more contemporary offer to old fashioned 'boozers'.
- 3.12.3.82. The clientele in the area appears to be mostly local as there are no significant NTE attractions to bring in an out-of-town crowd. There are two exceptions to this: the Kiln Theatre and Mean Fiddler live music venue on the Brent side. Both are important cultural venues but small and there was no impact on the public realm from them on the night.
- 3.12.3.83. Whilst there are some signs of 'gentrification' it remains a gritty high street with few vacancies and busy pavements. Many of the food shops / off-licences are open late and people were buying groceries and fresh food, e.g. halal meat in these until well into the evening.
- 3.12.3.84. On the Camden side there are 13 fast food (LNR) premises, 6 pubs, 10 restaurants (most provide takeaway) and 8 off-licences (including supermarkets). On the Brent side there are 19 fast food (LNR) premises, 6 pubs, 10 restaurants and 10 off-licences. Both sides of the street have similar levels of licensed premises. The total number of these main licence types gives an idea of how intense the round the clock experience is on the High Road. This does not include any licensed community uses or those licences for beauty parlours, hair stylists etc.
- 3.12.3.85. Overall, the area felt safe, there is very little intoxication visible and there was no drug use. The pavements were not as clean as Seven Dials, Fitzrovia and Swiss Cottage for example, but they were still clean by inner London 'high street' standards, and this reflects the intense nature of this high street's use by its customers. There were very few refuse bags left out into the evening.
- 3.12.3.86. The researcher arrived at 7pm. It was dry thorough the night but cold. This did not seem to affect the volumes of people using the street, which was busy

throughout the observation. The observation continued until 12:15am to identify any issues with later opening pubs and fast-food operations. Because the road is linear and there is very little activity on side roads, the route involved simply repeating a north to south traverse three times throughout the evening.

- 3.12.3.87. In this early part of the evening the pubs were busy as were the fast-food venues. There are significant issues with congestion of Deliveroo / Uber Eats / independent riders outside some of the more popular restaurants and fast-food venues in this central part. This was seen between 7pm and around 9pm. This is compounded by the limited width of the pavements here and limited parking for bikes / mopeds. This causes some negative impact and at 7.25pm there was an altercation between a Deliveroo rider and a pedestrian near the corner of the High Road and Victoria Road near a fast-food restaurant.
- 3.12.3.88. As the night progressed there was more fast-food litter dropped, particularly outside the larger chain venues, but overall, the street does not suffer from littering linked to LNR premises in the same way as those hubs of vertical drinking do when customers have left and are having their post-alcohol kebab or fried chicken.
- 3.12.3.89. There was no visible policing (nor any incidents to respond to), but this was not required based on the researchers' experience. There were only three further incidents of note linked to alcohol-led licensed premises on Camden's side – all pubs – during the night. These were: at 8:09pm at a pub in the centre of the High Road a man came out and urinated in the Brondesbury Medical Centre alleyway (on Brent side). At 9.53pm another man came out of another pub in this central area and urinated against the railing of Kilburn Grange Park. The third incident was at 11.55pm when a group of two men left a pub in the south of the High Road and were shouting obscenities, mostly into the night, but occasionally at passers-by.
- 3.12.3.90. At 10.46pm there was a scuffle outside the fast-food premises at the corner of the High Road and Victoria Road between a group of four young men. It was unclear if they were friends or strangers, but it was not serious and passed off quickly with both parties walking off in the same direction and was certainly not worthy of calling the police. The observations concluded at 12:15am.
- 3.12.3.91. Overall, the observations showed that there are some isolated and sporadic issues linked to the customers of specific licensed premises. This might be expected given the sheer volume of licensed premises across both boroughs in the High Road. Yet the number of incidents relative to the number of premises was extremely low. The area is simply a very busy mixed-use area, with high bus and private traffic on what are mostly dual carriageways. In this sense it shares many characteristics with other London local high streets, such as Streatham, Leighton or Peckham.

4. Conclusions

4.1. Summary by themes

4.1.1. Crime & disorder

4.1.1.1. Police recorded NTE crime in the borough in 2022/23 increased by 1.2% (n.140) compared to 2019/20. The increase is largely driven by theft, which saw a 9.1% increase (n. 510). Excluding theft offences, the borough saw a 3.3% (n.370) reduction in all other crime types between the two periods.

4.1.1.2. The fieldwork observations showed that drug use and dealing is a significant problem in Camden Town and also around Tottenham Court Road to clubgoers.

4.1.2. Ambulance and NHS impact

4.1.2.1. Overall, the number of ambulance call outs are relatively low in Camden, even in the CIP areas. They are only partially correlated with the locus of the night-time economy in the borough (e.g. parts of Camden Town), but also in locations such as Somers Town. They are not correlated with any part of the Seven Dials CIP area (even though this includes Charing Cross Road and Tottenham Court Road Station).

4.1.3. Noise

4.1.3.1. Data is not currently collected by Camden for on-street noise; thus, it is not possible to identify whether ambient noise hotspots exist, and thus whether any are inside the existing CIP areas or in other locations.

4.1.3.2. The Seven Dials CIP has been predominantly justified on the basis of noise impacting on residential amenity and thus the licensing objective of public nuisance (as opposed to crime and disorder or public safety as in Camden Town CIP). No quantitative data presented for this report supported a significant impact from noise, however residents in Covent Garden cited this as their number one concern.

4.1.3.3. Where noise records do exist, they are linked to complaints about individual licensed premises. Of these, three premises in the Camden Town CIP area have 14, 13 and 13 complaints recorded against them from January 2021 to December 2022, albeit they are some distance apart and hence there is no cumulative impact indicated. One premises in Swiss Cottage recorded 16 complaints; eleven of these were about smells emanating from the late-night food premises into a residential dwelling. Residents in Fitzrovia also named noise as the primary issue in the night time economy.

- 4.1.3.4. Noise from premises does not appear to be a major issue, and from fieldwork observations there was only limited evidence of noise caused from dispersal.
- 4.1.3.5. On-street observations did indicate some noise from a small subsection of those using the night-time economy in Camden Town and Kings Cross, and to a lesser extent Seven Dials, but this was low relative to other parts of central London in the researchers' experience.

4.1.4. Cleansing and night-time place management

- 4.1.4.1. Litter, both caused by premises and customers, is an issue across the borough that needs addressing. The build-up of litter across the night may influence the behaviour of individuals using the borough - this was clearly seen when comparing places with less litter with those with more.
- 4.1.4.2. Overall, the council provides additional resources for cleansing the two existing CIP areas, both first thing in the morning and then during the evening. However, this remains a small percentage of the overall budget for cleaning the borough's streets.
- 4.1.4.3. Street urination is a significant issue in both Camden Town and Kings Cross.
- 4.1.4.4. Broken alcohol bottles (from users of the night-time economy not street-based drinkers) are a very significant issue in Kings Cross, and to a lesser extent Camden Town.
- 4.1.4.5. Camden Town and Tottenham Court Road tube stations are significant hotspots for litter, drunkenness and congregations of those with street-based lifestyles.

4.1.5. Street drinking

- 4.1.5.1. Street drinking by those with street-based lifestyles (who will mostly have acquired alcohol from local off-licences) is a mild to moderate issue in Camden, certainly relative to some other London boroughs. It appears to be relatively well managed by the relevant stakeholders and the cleansing teams are very good at removing detritus.

4.1.6. General observations

- 4.1.6.1. Management of premises overall appears to be very strong across the borough, particularly around dispersal. There are some outliers, and these could be supported through refresher training, partnership work and/or management plans.
- 4.1.6.2. Issues with drunken behaviour on the street do not appear to be common, when they do occur there could be improved management of, or support for, the intoxicated individuals.

- 4.1.6.3. There is very little uniform presence in the borough at night, particularly foot patrols, which negatively affects feelings of safety and allows drug dealing and other anti-social issues to persist. At peak times (such as football matches) or when there is an incident there is an increased police presence.

4.1.7. Cumulative impact

- 4.1.7.1. A cumulative impact assessment must be based on evidence which demonstrates that one or more of the licensing objectives is being undermined by the behaviour of customers from licensed premises within a defined geographical area.
- 4.1.7.2. This report demonstrates that there is only support for a cumulative impact assessment from residents, but none of the other stakeholders, including the responsible authorities, consider it necessary to publish a cumulative impact assessment in Camden.
- 4.1.7.3. It is interesting to note that the issues raised by the residents in their support of a cumulative impact assessment relate to existing issues, such as noise and antisocial behaviour. These are all issues that can be addressed using existing measures available under the Licensing Act 2003 and other legislation (see section 5). They will not be addressed by the publication of a cumulative impact assessment as this will only be capable of dealing with future applications.
- 4.1.7.4. The decision as to whether to publish a cumulative impact assessment is the responsibility of the Licensing Committee, following consideration of all relevant information including the consultation responses. The decision must be evidence-based and capable of standing up to scrutiny by any external interested parties.

4.2. Overall conclusion

4.2.1. Principles

- 4.2.1.1. A licensing authority has a general duty to administer the Licensing Act 2003 in a way that is fair, reasonable and proportionate.
- 4.2.1.2. It is also a fundamental principle of the 2003 Act that a licensing authority must carry out its functions under the Act with a view to promoting the licensing objectives.
- 4.2.1.3. The Act provides a licensing authority with the discretion to publish a cumulative impact assessment (CIA) stating that the licensing authority considers that the number of relevant authorisations (i.e., premises licences or club premises certificates) in one or more parts of its area is such that it is likely that it would be inconsistent with the authority's duty to promote the licensing objectives to

grant any further relevant authorisations in respect of premises in that part or those parts.

- 4.2.1.4. A CIA must set out the evidence for the authority's opinion, in order to comply with the statutory requirements.
- 4.2.1.5. Each responsible authority will be an expert in their respective field, and in some cases, it is likely that a particular responsible authority will be the licensing authority's main source of advice in relation to a particular licensing objective. For example, the police have a key role in managing the night-time economy and should have good working relationships with those operating in their local area. The police should usually therefore be the licensing authority's main source of advice on matters relating to the promotion of the crime and disorder licensing objective. However, it remains incumbent on all responsible authorities to ensure that their representations can withstand the scrutiny to which they would be subject at a hearing (para 9.12, S182 Guidance).
- 4.2.1.6. The evidence underpinning the publication of a CIA should generally be suitable as the basis for a decision to refuse an application or impose conditions (para. 14.28, S182 Guidance).
- 4.2.1.7. Evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the relevant problems identified in the specific area to be covered by the CIA (para. 14.29, S182 Guidance).
- 4.2.1.8. After considering the available evidence and consulting relevant individuals and organisations, a licensing authority may be satisfied that it is appropriate to publish a CIA. The CIA should also be considered alongside local planning policy and other factors which may assist in mitigating the cumulative impact of licensed premises (para. 14.33, S182 Guidance).
- 4.2.1.9. The opinion expressed by a licensing authority in a CIA will continue to apply for a maximum period of three years from the date of publication of the CIA. Within that period, anyone making a representation against a relevant application relating to premises within the CIA area may rely on the evidence contained in the CIA, or the fact that a CIA has been published (para 14.41, S182 Guidance).
- 4.2.1.10. The statutory guidance also refers to other mechanisms for controlling cumulative impact. To enable the general public to appreciate the breadth of the strategy for addressing problems caused by a minority of consumers who may behave badly, statements of licensing policy may indicate the other mechanisms both within and outside the licensing regime that are available for addressing such issues (para 14.47, S182 Guidance).

4.2.2. Evidence

- 4.2.2.1. Police recorded NTE crime in the borough in 2022/23 increased by 1.2% compared to 2019/20. The increase is largely driven by theft, which saw a 9.1% increase. Excluding theft offences, the borough saw a 3.3% reduction in all other crime types between the two periods.
- 4.2.2.2. While the statistic relating to theft offences in the borough may be a concern, the research found no evidence to demonstrate that the increase in such offences has been caused by the customers of licensed premises in the borough.
- 4.2.2.3. The number of incidents recorded by CCTV that could be reasonably linked to the licensed / NTE economy is low in Camden. For example, in Camden Town, the area with the most logged night-time CCTV incidents, this amounts to less than one report a night in the 2023 data.
- 4.2.2.4. Overall, in 2022, there has been a fall in alcohol-related ambulance call outs in Camden compared to 2019. Indications are that there are now fewer alcohol-related ambulance call outs in Camden, and that the impact of alcohol sales and consumption has lessened their impact on the LAS, relative to when the CIPs were last reviewed.
- 4.2.2.5. There were only seven licensed premises locations with more than ten commercial noise complaints over a two-year period in Camden. None of the locations were in close proximity to each other, so this data does not present any evidence of cumulative impact from noise produced by licensed premises. It should be noted that no reliable data is currently captured that relates to 'noise in the street', that may be linked to the customers of licensed premises.
- 4.2.2.6. Some street drinking does take place in the borough and can sometimes be problematic in terms of the behaviour of street drinkers to each other and to other members of the public. Whilst it is possible that some of the alcohol consumed by these street drinkers has been bought at off-sales premises in the borough, there is no direct evidence linking these premises' customers directly to any street drinking hotspots.
- 4.2.2.7. Residents were strongly in favour of retaining the existing CIPs, but that view was not supported by the responsible authorities.
- 4.2.2.8. Data for the period 2017-2022 demonstrates that in the borough as a whole, 83.2% of new premises applications were wholly or partially approved, compared with 83.3% in the Camden Town CIP area and 76.0% in the Seven Dials CIP area. Approval rates are therefore similar within the Camden Town CIP area compared with the whole borough, and only around 7% lower in the Seven Dials CIP area. The trend was the same for full variations.

- 4.2.2.9. This suggests that the Licensing Committee considers each case on its own merits and there has been insufficient evidence in the majority of cases to justify a decision to refuse the application.

4.2.3. Opinion

- 4.2.3.1. Having reviewed the information contained in this report and taking into consideration the relevant principles, the authors are of the view that, on balance, there is insufficient compelling evidence to justify the publication of a CIA to promote any of the licensing objectives in any part of the borough of Camden.
- 4.2.3.2. This is not to say that the borough is free from issues relating to the way in which specific licensed premises are currently being operated and which may have an adverse effect upon one or more of the licensing objectives. This was the impression given by some residents.
- 4.2.3.3. However, those issues would not be addressed by the publication of a CIA. They are best dealt with by a partnership approach utilising other initiatives or measures that are readily available (see section 5, below).

5. Points for consideration

5.1. Introduction

5.1.1. Context

- 5.1.1.1. An innovative part of the Camden cumulative impact review requirement was to provide a potential suite of alternative methods to manage the impact of licensed premises should the borough's Licensing Committee decide that, on balance, insufficient evidence exists to support a CIA to be published for Camden Town, Seven Dials and/or the other areas of interest.
- 5.1.1.2. The thematic sections below set out several approaches that are utilised elsewhere in London and the rest of the UK, that could be taken by the London Borough of Camden to address the findings of this research where there is evidence of some negative impact from the customers of licensed premises on the licensing objectives.
- 5.1.1.3. It is important to note that LB Camden would benefit from considering many of these policy and project interventions regardless of whether the Committee decide to publish any CIAs.

5.2. Points by theme

5.2.1. Statement of Licensing Policy considerations

- 5.2.1.1. **1. A “joined-up” policy**
In a future Statement of Licensing Policy (SoLP), ensure that the policy makes meaningful and specific reference to the relationships between planning and licensing, such as in relation to any noise-related considerations, as set out in the S182 guidance. [Coventry City Council](#) make explicit reference to the relationship between licensing, planning and other regulatory authorities in its Statement of Licensing Policy.
- 5.2.1.2. **2. Set out a licensing vision**
Set out a vision for the new licensing policy, linked to night-time strategy engagement, to inform applicants of what Camden Council is looking to achieve through licensing in each part of the borough. Use language that makes those that invest in the borough's hospitality, leisure, arts and culture economy feel valued and welcome, which could encourage investment. Make positive statements about the borough's ambition to become more diverse and inclusive in terms of its licensing and its night-time economy. [Bedford Council](#) has recently achieved this in its 2024-27 SoLP.
- 5.2.1.3. **3. Flexibility to deal with new and urgent issues**
Include a statement in the SoLP to the effect that the council will not only keep

the SoLP under review, but it may also introduce additional policies/guidance on specific issues as and when they arise. This will provide the flexibility to deal with urgent issues (e.g. drink spiking) rather than undertake the longer process of formally reviewing the SoLP. Although they would not form part of the SoLP, the council will make licensees aware of these documents and expect them to comply with them in the interests of promoting the licensing objectives.

5.2.1.4. **4. Incorporate positivity**

Whilst challenges do exist with some licensed premises, the vast majority are overwhelmingly valued by the community for their economic, cultural and social value. The council should set out in the SoLP that it also encourages representations of support for licensing applications, as these are rarely received. This was noted in written evidence from [Devon Licensing Officers Group](#) to the House of Lords Select Committee on the Licensing Act 2003.

5.2.1.5. **5. Licence application database and new application emails**

Ensure that the relevant details of current licence applications are readily available and easily accessible on the council's website. Additional information can be made available to subscribers. For example, [Westminster City Council](#) has a weekly newsletter that informs subscribers about all licence applications received, refused and granted.

5.2.1.6. **6. Consider model conditions**

Introduce a pool of 'model conditions' to allow a wider range of more relevant and appropriate conditions that Licensing Committee members may select from on a case-by-case basis. Consult with responsible authorities, residents and businesses to develop these. The [London Borough of Barking and Dagenham](#) recently reviewed its Statement of Licensing Policy for 2022-2027 and added in an appendix of model conditions that was not present in the 2017-2022 policy. Should Camden wish to do this, including the businesses and residents in the development of these would be a truly innovative approach.

5.2.1.7. **7. Tailored core hours**

Should the council wish to retain core hours, it should consider developing a more evidence-based core hours policy by geography and licence type, in consultation with residents, businesses and other relevant stakeholders. [Westminster City Council](#) reviewed its core hours policy framework in 2020 to relate to the premises use type. Camden Council could do this and add in nuanced spatial boundaries to reflect the nature of neighbourhoods.

5.2.1.8. **8. A licensing charter**

Develop a licensing charter that licensees are encouraged to sign up to, with commitments to policies, procedures and positive contributions to reducing negative impacts such as crime, ASB and noise, ensuring these commitments are reasonable and within the licensee's control. [Islington Council's Licensing Authority](#) and the Police have recently developed a Licensees' Charter to

recognise high standards of management. [Westminster City Council](#) has also developed a charter to support premises to come up with innovative ways to reduce any potential negative impacts of their operations.

5.2.1.9. **9. Take a targeted approach to enforcement**

The licensing policy could be firmer on enforcement, stating what operators can expect if their premises are not compliant. It could make it clear that badly managed venues may be subject to reviews and the range of options available. This would be helpful as, currently, reviews tend to seek revocation rather than any of the other options. [Haringey Council](#) has a section on its website that details their enforcement approach and the different options they can use. This is also referenced in its Statement of Licensing Policy. Data could be used to target support for those businesses that require it most, for example [Leeds City Council](#) has developed a Licensing Matrix that demonstrates where a locality is at risk of health harms from licensing activity by ranking localities against each other through comparing different data sets.

5.2.1.10. **10. Evidence-based decisions**

Because, currently, a licensing officer in Camden is required to oppose applications in one of the two CIP areas, it is accepted that there is “a game to be played”. In each case, it is necessary to get a sense of the strength of the objection from the licensing officer. If the council decides to publish any CIAs, ensure that each case is dealt with on its own merits and any representations are only made where there is an evidential basis to support them. This is in the spirit of the legislation.

5.2.1.11. **11. If any CIA is published, consider innovative flexibility**

If the council decides to publish any CIAs, an exemption for a CIA to be dis-applied if a development obtains planning permission prior to applying for a new licence could be provided.

5.2.1.12. **12. It is possible to consider cumulative impact without a CIA**

Should the existing CIP areas not be replaced with CIAs, the Statement of Licensing Policy could state that any responsible authority or other person may make representations on an application for the grant or variation 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, However, in each case it would be incumbent on the person making the representation to provide relevant evidence of cumulative impact (see paragraph 14.42 *S182 Guidance*).

5.2.1.13. **13. Consider carefully how the policy impacts on potential diversification**

During development of the SoLP, consider its effect on different business types that would bring a more diverse offer into the borough, and look to remove any obvious barriers or build in flexibility where possible. Working alongside regeneration colleagues may help to develop a more inward investment and diversification positive policy. [Brighton & Hove Council](#) have developed a

tourism strategy that uses licensing legislation as one of the tools to achieve a balanced night-time economy.

5.2.1.14. **14. Consider all relevant factors in policy decisions**

Ensure that the new SoLP and how it is followed in decisions takes factors that may help mitigate any negative impact into consideration. Examples might include the Night Tube, seasonality, local BID support for the NTE, policing plans, noise mitigation, operational management plans / dispersal plans, etc.

5.2.1.15. **15. Agent of change (licensing)**

[The London Plan sets out the 'agent of change' principle](#) which protects existing land uses against complaints from incoming users, e.g., an historic pub from noise complaints from a new residential block (or vice versa). Agent of change is also in national planning guidance. Agent of change has also now been included in the revised S182 guidance issued by Home Office in December 2022 and should be strongly referenced in the new Camden Statement of Licensing Policy, including how the council plans to use it to protect both licensed venues and residential amenity.

5.2.1.16. **16. Move to licensing sub-committee deliberations in private**

Currently, members of the licensing sub-committee conduct deliberations in public. This creates a situation that can undermine the integrity of the system. The council should consider moving the decision-making aspect of a hearing to private. Transparency can be maintained when the detailed reasons are given for decisions on licensing applications in accordance with the statutory duty.

5.2.1.17. **17. Operational management plans and dispersal plans**

Capital Shaftesbury and other large landowners insist on their hospitality businesses having an operational management plan (OMP) to mitigate risk. Residents in parts of Camden request that licensees have an effective dispersal plan as part of their licence conditions. The council should support the much wider spread use of these for those licensed premises that are likely to have a detrimental impact on any of the four licensing objectives.

5.2.2. **General considerations**

5.2.2.1. **18. Enhancing communication and partnerships with businesses**

Consider reviewing the approach taken to licensed premises with a view to enhancing communication and working in partnership with operators of licensed premises, particularly when introducing new initiatives. If businesses are actively involved in schemes, they place more value on them.

5.2.2.2. **19. Use of data in creating policies**

Camden could usefully draw on a broader range of data types when developing policies (as is the approach in the borough's Night-time Strategy). Wherever possible, the SoLP should be supported by relevant evidence.

5.2.2.3. **20. Apply a ‘Night Test’ when developing policies**

It may be useful to use the [Night Test](#) when implementing any policy that may have an impact on the viability of the evening and night time economy, as recommended by the London at Night Commission. This will shortly be encouraged in all boroughs by the Mayor of London alongside the GLA’s own policies.

5.2.2.4. **21. Planning service support of granted applications**

Camden’s planning department could provide a representation in support of a licence application where they have granted planning permission on the same (or very similar) terms being applied for.

5.2.2.5. **22. Cross-borough collaboration**

Consider how the London Borough of Camden could work with neighbouring boroughs with the common objective of addressing issues in NTE areas that straddle two boroughs (e.g., Westminster in the West End; Brent in Kilburn). [The Licensing Partnership](#) is an example of how local authorities in the Kent area are working together on licensing matters. In Nottinghamshire, all seven local authority areas meet monthly to discuss collaborative approaches to licensing related matters.

5.2.2.6. **23. Communication with residents on policies and approaches**

When implementing new policies or approaches, ensure these are explained fully to all stakeholders. For example, should one or more of the CIP areas not be replaced by a CIA, it will be important to explain to residents, who are generally in favour of the current CIPs, that the issues they experience do not justify the publication of a CIA and will be dealt with by other appropriate and proportionate measures. How can they expect to receive progress updates with these and how can they ask questions or express any concerns? In 2022, [Cheshire East Council](#) produced a communications strategy to maximise their reach and effectiveness of communication between stakeholders including residents and businesses.

5.2.2.7. **24. Encouraging diversity, e.g., independent businesses**

Measures such as free pre-application support, providing forms and guidance in different languages to support entrepreneurs with English as a second language and enabling licensing applications to be submitted and paid seamlessly online could remove unnecessary barriers for businesses that would bring diversity to the borough. Camden is already experimenting with this and has been granted money from the Mayor’s Night-time Fund to develop a better experience for businesses. This could be supported on an ongoing basis. [Waltham Forest Council](#) has a Night Time Economy Business Application Toolkit that pools together all relevant guidance into one place.

5.2.2.8. **25. Toilet provision**

As is not unusual in current times, public toilet provision at night in the London

Borough of Camden is not sufficient to cope with the requirement. Implementing a community toilet scheme may help to address this issue. It was reported by one interviewee that Camden does have a community toilet scheme, so it may be that this needs the focus to grow and become effective. [Bristol City Council](#) has been able to expand their Community Toilet Scheme and have a guidance page for businesses to find out more about it. Derry-Londonderry introduced a '[Community Toilet Scheme](#)' in April 2018 which allows the public to use a premises toilet without having to make a purchase.

5.2.2.9. **26. Cleansing & trade waste issues**

A review of the cleansing regime in London Borough of Camden is needed. Despite some positive ad hoc work by the council's waste team, the presentation of the borough in night-time economy hours is not in line with the council's aspirations for the borough at night. Bristol has created a [Clean Streets Strategy](#), working with residents, community groups, businesses and other stakeholders supported by targeted enforcement action.

5.2.2.10. **27. Transport and dispersal**

Conduct a needs analysis in relation to the public transport provision in the borough, particularly in Camden Town, matching provision to demand. Some work to understand the feasibility of expanding the capacity of Camden Town station and greater use of Mornington Crescent would be beneficial. Encourage partnership work and active conversations with businesses to support them with the impacts they currently experience due to the lack of capacity at this station.

5.2.2.11. **28. Protecting the cultural asset that is London Borough of Camden**

Consider how the London Borough of Camden and its wider hospitality, leisure and night-time economy can be protected through the developments taking place (e.g. HS2). Approaches such as Pub Protection Policies could be used to protect businesses as recommended in the [London Plan](#) (Policy HC7 Protection of Public Houses). This was expressly mentioned by several stakeholders that were interviewed for this report. Some London boroughs have incorporated this in their local plan e.g. [Lambeth Local Plan 2021](#).

5.2.2.12. **29. Transparency of the Late-Night Levy**

The local authority and police colleagues could consider publishing regular updates on how the Late Night Levy funds are spent. [The City of London](#) produces an annual report detailing how much the levy is generated and what this has been spent on.

5.2.2.13. **30. Better internal communication**

Suggestions were made for a more joined-up approach between responsible authorities, for example between planning and licensing. [Coventry City Council \(p31\)](#) has co-located their planning and licensing teams in the same office to ensure better internal communication and collaboration. Hammersmith & Fulham have also just co-located licensing and planning services to ensure a

more cohesive approach to decision-making (within the legal limitations of each regime). This approach could avoid the situation where the applicant's planning conditions and licensing conditions list different terminal hours, for example.

5.2.3. Alternative approaches to managing issues

5.2.3.1. 31. Fostering partnerships

Taking a partnership approach to addressing issues was supported by many interviewees, which is also generally considered best practice in licensed/night time economy management.

Encouraging regular dialogue to discuss and mediate solutions to issues such as noise and litter and foster common understanding between businesses, residents, statutory bodies and other relevant stakeholders would be welcomed by interviewees. This could be through a forum hosted by the local authority, for example, introducing and resourcing night-time partnerships that have responsibility for managing the night-time economy locally (could be initially for Camden Town and Seven Dials).

5.2.3.2. 32. Night-time audits and walks

Night time economy partnership walks with various partners (police, council residents, BIDs, landowners) can also be useful. The [Heart of London Business Alliance \(pg.76\)](#) conducts regular stakeholder night walks to enhance partnership working and understanding of what is working and what is not at night.

5.2.3.3. 33. Business Improvement Districts

BIDs are excellent partnership initiatives that often implement creative solutions to address many of the issues identified in this report. Not all parts of the London Borough of Camden have a BID in place, so these could be developed in areas where they do not exist currently. The list of BIDs in the London Borough of Camden is shown below:

- [Camden Town Unlimited](#)
- [Euston Town BID](#)
- [The Fitzrovia Partnership](#)
- [Central District Alliance](#)
- [Hatton Garden BID](#)

5.2.3.4. 34. Capable guardians

Consider additional uniformed presence to address issues where there are insufficient police, for example the [Fitzrovia Partnership](#) fund [My Local Bobby](#) to patrol the area.

- 5.2.3.5. **35. Safe place (currently introduced)**
Continue the Camden Town Safe Space. Benefits include safety and support for patrons, supporting the Violence Against Women and Girls agenda, reducing the strain on blue light services, and many more. Camden should consider how to make this sustainable in the long term, e.g., by making the financial case to the local NHS Trust. The [SOS Bus in Colchester](#) has been successful in securing financial support for a number of years from the local NHS Trust.
- 5.2.3.6. **36. Camden Night-Time Strategy (under development)**
Develop a night-time strategy that identifies a vision for the type of night-time economy the borough wants and where, how to seize the benefits of the NTE, how to deliver more effective partnership working, and how it will mitigate negative impacts. The [Greater London Authority](#) has produced guidance on developing a night time strategy. The strategy must have the weight of the council behind it to ensure delivery, alongside the commitment of named delivery partners.
- 5.2.3.7. **37. Radio schemes**
Introduce a radio scheme for licensed premises specific to key leisure/hospitality/NTE clusters. Where these already exist, look at how they can be bolstered to provide the most benefit. Where police resources are stretched, ensuring that there is an effective connection between the business radio scheme and the CCTV control room, and in turn CCTV and the police, can be invaluable. A strong example of effective radio scheme is Nottingham BID's [Digital Radio System](#).
- 5.2.3.8. **38. Vulnerability training**
Support cohesive roll out of [Ask for Angela](#)/vulnerability training across the borough. Promote the excellent, simple [Transport for London bystander intervention campaign](#) to residents, visitors, workers and other communities in Camden.
- 5.2.3.9. **39. Pubwatch**
Where a licensed business forum does not exist in an area with clustering of premises, e.g. Euston, a [Pubwatch](#) could be set up to empower licensees to work together to address issues. These fora can provide excellent opportunities for communication and partnership working between businesses and other key stakeholders in the locality. To ensure maximum effectiveness, it is important that meetings have regular attendance from the local authority, police and other key partners.
- 5.2.3.10. **40. Purple Flag**
Consider seeking [Purple Flag](#) accreditation, initially for Camden Town and Seven Dials. Purple Flag is the gold standard scheme for holistic management of the night-time economy. It assesses places against the following five themes:

- Wellbeing
- Movement
- Appeal
- Place
- The policy envelope

5.2.3.11. **41. Night time Champion**

Introduce a night-time champion/representative to both champion the Camden night time economy but also mediate licensed premises/resident disputes. The Government of New York City have set up [Mediating Establishment and Neighbourhood Disputes \(MEND\) NYC](#), a city-wide initiative that provides free mediation and conflict resolution services to address a number of neighbourhood disputes, including:

- Quality-of-life issues between residents and businesses
- Negotiation between commercial tenants and landlords
- Neighbouring business to business misunderstandings

5.2.3.12. **42. Best Bar None**

Introduce [Best Bar None](#), the industry and Home Office supported best practice accreditation scheme for licensed premises, that encourages continual improvement in operating standards through partnership working.

5.2.3.13. **43. Street drinking**

Implement some targeted initiatives that have helped other towns and cities to reduce street drinking, such as bottle marking, awards schemes, training and the prevention of some alcohol types being sold e.g., white ciders. The Association of Police and Crime Commissioners have produced [this guidance document of best practice](#) for tackling street drinking. The [Reducing the Strength](#) campaign is a multifaceted approach whereby retailers are encouraged to not stock strong strength lagers, beers and ciders (usually associated with street drinking) whilst partners provide strategic support measures that has seen success reducing street drinking in other areas.

Newcastle, England: The Newcastle Best Bar None scheme is a program that promotes responsible alcohol sales and consumption in the city's licensed premises, including off-licenses. The program involves training and support for bar staff and off-license owners, as well as targeted enforcement of public drinking laws to reduce alcohol-related disorder.

Nottingham, England: The Nottingham Alcohol Harm Reduction Strategy includes a program called the Off-Licence Award Scheme, which provides training and support to off-licence staff to promote responsible alcohol sales and

reduce the likelihood of alcohol-related disorder. The program also includes targeted enforcement of public drinking laws and collaboration with local businesses to promote responsible drinking.

Wakefield, England: The Wakefield Alcohol Partnership is a collaboration between local authorities, police, health services, and community organisations aimed at reducing alcohol-related harm in the Wakefield district. The partnership focuses on prevention, early intervention, and enforcement to reduce the impact of alcohol-related harm on individuals and the community. The partnership also works with local businesses, including off-licences, to promote responsible alcohol sales and consumption.

Dublin, Ireland: The Safer Streets Initiative is a partnership between the Dublin City Council, the police, and local businesses aimed at reducing public disorder and anti-social behaviour related to street drinking. The initiative involves the installation of CCTV cameras, increased police presence, and targeted enforcement of public drinking laws, as well as education and outreach programmes to promote responsible drinking.

Melbourne, Australia: The City of Melbourne has implemented a programme called the Late-Night Alcohol Management Strategy, which aims to reduce the negative impact of alcohol-related violence and anti-social behaviour in the city's entertainment districts. The programme includes initiatives such as the provision of water stations, free public transport, and a partnership with licensed venues to promote responsible drinking.

Seattle, USA: In Seattle, the Law Enforcement Assisted Diversion (LEAD) program aims to reduce the harm caused by alcohol and drug addiction by diverting low-level offenders away from the criminal justice system and into community-based services. The programme involves collaboration between police officers, social workers, and community organizations to provide support and services to individuals struggling with addiction.

Vancouver, Canada: The Downtown Eastside Second Generation Strategy is a comprehensive programme aimed at addressing the complex issues of poverty, addiction, and homelessness in Vancouver's Downtown Eastside neighbourhood. The programme includes initiatives such as the provision of affordable housing, harm reduction services, and addiction treatment programmes, as well as increased police presence and targeted enforcement of public drinking laws.

Some initiatives that work with off-licences (retailers that sell alcohol for off-premises consumption) to reduce street drinking include:

Edinburgh, Scotland: The Edinburgh Alcohol Partnership is a collaboration between local businesses, the police, and other stakeholders aimed at reducing alcohol-related harm in the city. The partnership includes an Off-Licence Initiative that provides training and support to off-licence staff to promote responsible alcohol sales and reduce the likelihood of alcohol-related disorder.

Auckland, New Zealand: The Auckland Council has implemented a programme called the Liquor Licensing Trust that aims to reduce alcohol-related harm by promoting responsible alcohol sales and consumption. The programme involves collaboration between the council, off-licence owners, and community organizations to promote best practices in alcohol sales, reduce the availability of cheap alcohol, and promote responsible drinking.

- 5.2.3.14. **44. Camden and Inner London Licensee Association (CILLA)**
Ensure that CILLA is supported to be as effective as it can be, e.g. licensing officers encouraging venue attendance, police, council & BID attendance at every meeting, identify a local licensing solicitor to attend and provide any pertinent updates.
- 5.2.3.15. **45. Regular, location-specific communication**
The monthly emails that used to be sent out by the police with specific information that helped businesses plan and made them aware of emerging issues could be reinstated, without venues being named, which was the reason they stopped. They could be sent with wider partnership input e.g. details of relevant BID initiatives, licensing updates from the local authority (local issues or national legislation), details of expected passenger numbers through the national rail stations in the borough. This could become a really “business friendly” tool.
- 5.2.3.16. **46. Increase environmental health activity**
Increase the resources to support more environmental health activity such as proactive walk rounds, potentially in partnership with other agencies such as the police.
- 5.2.3.17. **47. Night Hosts**
Night hosts or a similar role could help to manage a range of issues and support these with partnership work. Westminster City Council has relaunched its successful [Night Stars](#) scheme with a team of volunteers who conduct this work. Reliance on volunteers can be a challenge, especially post Covid, so Camden’s approach will need to consider this.
- 5.2.3.18. **48. Noise around transport hubs**
Some “capable guardians” should be introduced to help manage the noise/queuing issues outside public transport hubs at night (this could be incorporated as part of the Night Hosts approach). Many towns and cities across the UK use taxi marshals to manage queuing and potential disorder at transport

hubs, the marshals also provide a welcoming and reassuring presence at night. This would be particularly beneficial to Camden Town.

5.2.3.19. **49. Noise and other issues caused by food delivery drivers**

Avoid introducing standard licence conditions to deal with these situations, as the licensed premises do not have any control over the delivery firm drivers. Instead, work with the delivery companies to address the issues that their operatives create. Islington has recently supported the roll out of “[Wings](#)”, an ethical food delivery service model where the riders – who are employed – must undergo training on how to mitigate their actions on residents and other public realm users.

5.2.3.20. **50. Late Night Levy**

It may be useful to review how the late night levy is used, to understand if there are initiatives or approaches that are not currently being funded that could support the reduction of the concerns identified in the night time economy. Camden may wish to consider using the funds in a similar way to Hackney with its [Hackney Nights](#) programme and night-time coordinator. This seeks to improve the borough’s NTE experience for customers, residents, businesses and the responsible authorities through training and standards for venues and marketing and communications campaigns to the public.

5.3. Data considerations

5.3.1.1. **51. Borough-wide licence premises census**

Camden Council should ensure its innovative proposed ‘licence census’ is completed in 2023. The data from this will be vital to reviewing the SoLP, the progress against the night-time strategy and other borough policies such as the Local Plan.

5.3.1.2. **52. Noise data**

Revisit the council’s noise recording practices and processes to allow more specific data to be collected about where noise is happening, what the sources are and thus support more granular future analysis. Currently, it is not possible to understand where on-street noise is a significant problem, for example.