

Adrian Overton

Licensing Officer

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Your ref:

Our ref:

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Dear Mr Overton,

I am writing in my position as Licensing Sergeant for Hammersmith and Fulham Borough Police in response to your consultation for a Cumulative Impact Policy for the area of Shepherds Bush and its environs. Police fully support the Licensing Authorities proposals in introducing this policy and believe that it will have a positive impact on the reduction of crime and disorder in the Shepherds Bush Area. This is based on the following key areas.

Shepherds Bush Geographical Area

The area of Shepherds Bush is geographically centred around Shepherds Bush Green. This area is a landmark on the borough. This area has historically provided the borough of Hammersmith and Fulham with its most challenging policing neighbourhood. This neighbourhood has a broad spectrum of policing concerns which range from street drinking, drug issues, the policing of a Queens Park Rangers Football Club and the arrival of Europe's largest shopping centre. Within this tapestry of policing issues there lies the issue of alcohol related crime and disorder. The area has 36 premises that can be described as pubs/bars/clubs and a further 114 premises that account for off licence, restaurants and take away food outlets. This forms a considerable network of licensed premises that cater for most preferences. Police believe that there is no further need for alcohol led premises in Shepherds Bush.

Police Crime Data

Shepherds Bush Green is a borough 'hotspot' for crime. The area is lined by licensed premises that provide both on and off sales. Police are of the opinion that the number of premises in this area is sufficient to meet the needs of patrons.

Police data regarding crime in licensed premises has been provided to the licensing authority. Police data shows crime linked to 36 licensed premises across the last five years. The data shows the following points that are relevant to the licensing objectives. The data demonstrates that the key type of offences committed in licensed premises relate to theft and assault.

In terms of theft, this has largely been theft of unattended personal property from patrons of establishments. From viewing a cross section of crime reports these offences generally involve drunken victims having their property removed from their person or taken whilst left unattended in the premises. This contributes to a considerable number of total offences across the borough.

In terms of assaults, these range from common assaults through to grievous bodily harm. These are serious offences where victims have been attacked within premises. This data does not account for incidents of assault that have occurred directly after persons leaving premises.

The data demonstrates that a large proportion of offences occur between 1900 and 0400 hours. These are the time periods when licensed premises are at their busiest. These are also the time periods when police resources are most stretched. Any addition to the number of premises would increase the demand on police resources.

Off licence Sales

During the Crime Summit in March 2011 key feedback was provided to police regarding licensing issues around off licences in Shepherds Bush. There were clear community concerns raised about the sale of alcohol to street drinkers in Shepherds Bush and the after hours unlicensed sale of alcohol. These concerns are corroborated by recent police proactive action and intelligence received. The impact of this on crime and disorder is significant in the Shepherds Bush area.

By operating late hours off licences continue to provide alcohol to customers who continue to drink after the closure of on licensed premises. These persons continue to drink without the limitations and the safety measure provided by on licensed premises. This is witnessed and dealt with on a regular basis by the local safer neighbourhood team. There are a considerable number of off licences premises in the Shepherds Bush area. In an area where the re-occurring community complaint is that of street drinking on Shepherds Bush Green and its environs, police believe it would be responsible to include off sales within this policy. This would also assist with the successful policing of the premises that already exist.

Take Away Food outlets

The area of the proposed Cumulative Impact Policy contains a considerable number of take away food outlets. Police believe that it would be reasonable for premises with a late night refreshment licence to be included within the Cumulative Impact Policy. These premises contribute to crime and disorder in the area and nuisance behaviour. The premises provide for the sale of food stuffs after licensed premises close. This encourages persons to remain in the area rather than dispersing. As a result, flashpoints occur between drunk people. These flashpoints occur in premises which are generally small in size, short in staff numbers and without regulated security staff. As a result the area around Shepherds Bush Green, Uxbridge Road and Goldhawk Road is considerably affected by crime and nuisance behaviour associated with these premises. Local residents regularly complain to police regarding issues surrounding take away food outlets in this area. Police believe that to include this type of premises within the Cumulative Impact Policy would be both timely and reasonable.

Police Resources

Hammersmith and Fulham Borough Police have a dedicated Safer Neighbourhood Team in Shepherds Bush. This team works with the community and take their priorities from the community. Street drinking and alcohol led crime is one of the ward priorities. The local policing team deals with this proactively through the use of controlled drinking legislation and proactive patrolling. This stretches police resources. It takes police officers away from dealing with other ward and borough issues. Any increase, in any form, of licensed premises will continue to put pressure on police resources. By limiting the growth of licensing activity in this area the cumulative impact policy would in turn provide an effective safe guard against any unnecessary and further increase of crime and it's associated nuisance behaviour. Police resources are committed to deal with the boroughs licensing issues as they are, any further increase will begin to undermine results achieved to date.

Fulham CIP

In August 2010 police responded to the Licensing Authorities *Statement of Licensing Policy*. In this response police welcomed the possibility of a Cumulative Impact Policy being developed in the Shepherds Bush Area. Police are supportive of the proposal for Shepherds Bush. The benefits of a Cumulative Impact Policy on the borough can be seen in the Fulham Broadway area. In Fulham the benefits have been significant. The policy works alongside the controlled drinking zone and safer neighbourhood policing in order to prevent any further saturation of the area, allowing police and partner agencies to effectively deal with the issues that already exist without the addition or complication of further issues. This has been applied to both on and off licenses. The policy has contributed to a reduction in alcohol related offences in the area. Furthermore, it has contributed to a change in the style of drinking in the vicinity of Fulham Broadway. Police would note that premises are now largely food led rather than led by vertical drinking considerations. In the opinion of police this has contributed to a change in the character of patrons using Fulham Broadway and assisted in a reduction in crime.

In summary, Police fully support the introduction of a Cumulative Impact Policy in the Shepherds Bush Area. Police regard this as a policy, which alongside controlled drinking legislation and Safer Neighbourhood policing, has the potential to have a positive effect on the reduction of crime in the Shepherds Bush area. A CIP has been proven to work in other parts of the borough, and police would argue that any introduction of this policy in Shepherds Bush would have a greater impact than in Fulham. Police Crime data demonstrates that drink related offences in Shepherds Bush are of a considerable quantity and timing to justify the police support of this policy. Police resources are currently stretched in dealing with the amount of premises that are already licensed in the Shepherds Bush area. Any further saturation of the area would reasonably be expected to increase crime and disorder and have a negative effect on residents, visitors, workers and businesses that are already present in the area.

Submitted for your information and consideration

Stuart Ratcliffe

Licensing Sergeant

Hammersmith and Fulham Borough Police