



London Borough of Wandsworth

Environment and Community Services

Cumulative Impact Assessment: Research Report

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London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Index of Sections		Page No.
Part One	Summary of Report	4
Section 1	Executive Summary	4
Section 1.2	Conclusions: Summary by themes	5
Section 1.3	Recommendations	8
Part Two	Overview Of Cumulative Impact Assessments (CIAs)	10
Section 2	Introduction	10
Section 2.2	Definition	10
Section 2.3	Historical context	11
Part Three	Other Legislative and Policy Context	13
Section 3.1	CIA Evidence Requirements	13
Section 3.2	Consultation for Cumulative Impact Policy	14
Section 3.2	Key evidence types for CIAs	14
Section 3.4	Statutory obligations	15
Section 3.5	Current status in Wandsworth	15
Section 3.5.2	Evidence collection for CIA	16
Section 3.5.3	Exceptions to CIA, as approved by Wandsworth Licensing Committee on 16/07/2024	16
Section 3.5.4	Consultation process	18
Section 3.5.5	Financial implications	18
Section 3.5.6	Introduction to research	18
Section 3.5.7	Scope	19
Section 3.5.8	Objectives	19
Section 3.5.9	Local Licensing Policy	19
Section 5.9.2.	Relevant Local Strategies	20
Section 5.9.2.2	Night Time Strategy for London Borough of Wandsworth	20
3.5.9.3	Other relevant strategies	22
Part Four	Research report by MAKE Associates and Six Till Six	23
Section 4 (a)	Methodology	23
Section 4.1	Engagement	23
Section 4.2	Crime and ASB data	23
Section 4.3	Local Ambulance Service data	24
Section 4.4	Noise data	24
Section 4.5	Street drinking data	25
Section 4.6	Licensed Premises data	25
Section 4.7	Fieldwork	26
Section 4(b)	Assessment of Cumulative Impact	27
Section 4.8	Number of licensed premises in the borough	27
Section 4.9.1	Crime in the Borough	28
Section 4.9.1.6	Crime Heat Maps for Areas with a Density of Licensed Premises	30
Section 4.9.1.8	Key insights in crime data	33
Section 4.9.2	ASB in the Borough	35
Section 4.9.2	ASB Heat Maps for Areas with a Density of Licensed Premises	36
Section 9.2.11	Summary of Crime and ASB findings	42

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Section 4.10	Ambulance data: Headline findings	45
Section 4.11	Noise: Headline findings	48
Section 4.12	Street drinking: Headline findings	48
Section 4.13	Fixed Penalty Notices data	50
Section 4.14	Fieldwork observations	51
Section 4.15(c)	Stakeholder consultation	53
Section 4.15.2	Hierarchy of challenges from the met police	54
Section 4.15.3	Specific issues by location	54
Section 4.15.4	Police support for CIAs	54
Section 4.15.5	Primary concern for Putney members	55
Section 4.16	Conclusions	55
Part Five	Alternative/Complementary Approaches to a CIA	56
Section 5.1 (a)	Statement of Licensing Policy considerations	56
Section 5 (b)	General considerations	58
Section 5 (c)	Alternative approaches to managing issues	59
Part Six	Recommendations	64
Section 6.5	Recommended CIAs in the Borough of Wandsworth	64
Appendices	Appendix	65
Appendix A	Rough outline of the suggested CIA and the road names for the proposed Cumulative	65
Appendix B	Proposed CIAs and road names in the Borough of Wandsworth	67

1. Executive Summary

The Licensing Authority has carried out Cumulative Impact research for the London Borough of Wandsworth following a request to do so by the Licensing Committee.

At its meeting on 25th October 2023, the Committee agreed that research into cumulative impact should be carried out for Wandsworth Borough. This agreement was reflected in the revised Statement of Licensing Policy (Paragraph 10.1), which was approved by the Committee and adopted by Full Council on 22nd May 2024.

As a Licensing Authority, the Council is required to ensure that any decision relating to premises licence applications for the sale of alcohol, regulated entertainment or late-night refreshments is appropriate for the promotion of the four licensing objectives:

- the prevention of crime and disorder
- public safety
- the prevention of public nuisance
- the protection of children from harm

The purpose of the Cumulative Impact research is to assist the Licensing Committee of the London Borough of Wandsworth in determining if there is sufficient evidence to consult on publishing one or more Cumulative Impact Assessments in the borough. 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.

A Cumulative Impact Assessment, if approved, must be reviewed every three years.

The evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the particular problems identified in the specific area to be covered by the CIA.

The Licensing Authority commissioned independent, specialist researchers to undertake cumulative impact research in the borough. The cumulative impact research was conducted using a varied methodology, including:

- Crime and ASB mapping
- London Ambulance Service callouts and hospital admissions data
- Noise and other complaints relating to licensed premises
- Street drinking information
- Licensed premises data
- Pre-consultation with Ward Members and Responsible Authorities
- Observation fieldwork (overnight audits).

1.2 Conclusions

Summary by themes

1.2.1 Licensed Premises

1.2.1.1 The research analysed the borough as a whole and five 'areas of interest' in particular. These 'areas of interest' broadly follow the number and density of licensed premises where there are elevated levels of crime and disorder and ASB, which may be linked to these clusters of licensed premises. The 'areas of interest' do not match ward boundaries (in fact they often cover more than one ward) or formal town centre boundaries, e.g. as set out in the Local Plan.

1.2.1.2 The highest concentrations of licensed premises in the borough are within the Putney (191) and Clapham Junction (124) areas of interest. This is followed by Wandsworth Town (112), Balham (89) and Tooting Broadway (84) areas of interest. A more detailed analysis of the number and type of licensed premises is shown on page 25 and 27 of this report.

1.2.2 Crime and Disorder

1.2.2.1 During the period from 1 December 2023 to 30 November 2024, a total of 5,110 crimes were recorded across the whole borough. The top five crime hotspots recorded by the Metropolitan Police were theft (1116), public order offences (904), violence against the person (872), arson and criminal damage (751), drugs offences (614) and robbery (437).

1.2.2.2 The whole borough hotspot map of criminal offences indicates several clusters of offences across a 12-month period as shown below:

- (a) Clapham Junction (600 incidents)
- (b) Putney (576 incidents)
- (c) Tooting Broadway (555 incidents)
- (d) Wandsworth High Street (338 incidents)
- (e) Central Balham (288 incidents)

1.2.2.3 ASB Incidents

1.2.2.4 ASB incidents indicate several clusters of incidents across a 12-month period as shown below:

- (a) Clapham Junction (828 incidents)
- (b) Tooting Broadway (508 incidents)
- (c) Wandsworth High Street (374 incidents)
- (d) Putney (276 incidents)

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

(e) Central Balham (254 incidents)

- 1.2.2.5 Key insights to the hotspot areas shows Clapham Junction with the highest proportion followed by Tooting Broadway then Putney and Balham.
- 1.2.2.6 The police, public health and community safety stakeholders support the introduction of cumulative impact assessments (CIAs) to help mitigate pressures on local resources. Tooting Broadway was identified as the primary location where a CIA would be most effective, followed by Clapham Junction as a secondary priority.
- 1.2.2.7 Aggressive begging, alcohol-related violence and post-11 pm dispersal from venues and takeaways were cited as key challenges.
- 1.2.2.8 Primary concerns for Putney members were Putney High St. Members report concerns about assault, noise, intoxication and vandalism, particularly after venues close. There are concerns around overcrowding, unpredictable behaviour, noise, litter and road safety.
- 1.2.2.9 The number of late-night food venues is a particular concern, together with nightclubs and pubs. Police report aggressive begging, off licences and rough sleeping is an issue around Putney Station (also seen on observations).

1.2.3 Ambulance callouts for alcohol-related incidents

- 1.2.3.1 The ward containing the **Tooting Broadway** area of interest had the highest volume of alcohol-related ambulance callouts, followed by the wards containing the **Putney** area of interest and then the wards containing the **Clapham Junction** area of interest.
- 1.2.3.2 The highest number of alcohol related call outs in the borough of Wandsworth took place during the hours of 23:00 and 01:00 hours, followed closely by 22:00 and 00:00 hours. This is particularly evident on a Saturday night when almost a quarter (23%) of all alcohol related call outs took place during the hours of 23:00 and 01:00 hours. However, alcohol related call outs that took place Monday-Thursday were highest during the hours of 19:00 to 20:00 hours.
- 1.2.3.3 The highest number of assaults against the person (Includes Aggravated Bodily Harm and Grievous Bodily Harm) took place in the early afternoon with 15:00-16:00 hours having the highest number of callouts, followed by 14:00-15:00 hours. However, just over a fifth of all assault callouts on a Saturday take place between 23:00 hours pm and 01:00 hours. Around 70% of all assault-injury flagged calls took place between 14:00 and 01:00 hours.

1.2.4 Environmental Concerns:

- 1.2.4.1 During the period April 2023 and March 2024 Wandsworth Council recorded 1,720 licensing complaints relating to existing licensed premises. Balham,

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Thamesfield (which contains part of the **Putney** area of interest) and Battersea Park had the highest number of public nuisance complaints and other complaints relating to licensed premises, followed by Lavender (which contains part of the **Clapham Junction** area of interest), Wandsworth Town and St Marys.

1.2.4.2 The fieldwork observations showed that noise and littering were significant issues across town centres, particularly in Tooting Broadway, Putney and Clapham Junction. Poor street lighting and inadequate public toilet provision exacerbated safety concerns, particularly for women and vulnerable groups.

1.2.5 Stakeholder Consultation

1.2.5.1 The police, public health and community safety stakeholders highlighted Tooting Broadway as the most resource-intensive area, followed by Clapham Junction.

1.2.5.2 Aggressive begging, alcohol-related violence and post- 23:00 hours dispersal from venues and takeaways were cited as key challenges.

1.2.5.3 Ward Councillors in the **Putney** area of interest report concerns about assault, noise, intoxication and vandalism, particularly after venues close. There are concerns around overcrowding, unpredictable behaviour, noise, litter and road safety. The number of late-night food venues is a particular concern, together with nightclubs and pubs. Police report aggressive begging, off licences and rough sleeping is an issue around Putney Station (also seen on observations

1.2.6 Specific issues identified by Location are shown below:

- Tooting Broadway and Putney Station: Aggressive begging is a recurring concern, particularly in these areas.
- Putney (all areas): Rough sleeping, often linked to begging and the presence of off-licences, contributes to ongoing challenges.
- Tooting Broadway: The concentration of off-licences facilitates 'pre-loading' and 'side-loading' behaviours, exacerbating issues around alcohol-related crime and antisocial behaviour. Late-night food premises are an additional factor post-23:00 hours.
- Northcote Road: The dispersal of patrons from the cluster of licensed premises poses challenges.

1.2.7 Fixed Penalty Notices

1.2.7.1 Between 01/04/2023 and 31/03/2024, the police issued a total of 239 anti-social behaviour (ASB) notices ,16 community warning notices (CWNs) and 6 community protection notices (CPNs).

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

1.2.7.2 The Wards of Nine Elms and Lavender (which contains part of the **Clapham Junction** area of interest) had the highest number of ASB notices, followed by Battersea Park, Thamesfield (in which part of the **Putney** area of interest is located) and Tooting Broadway.

1.2.8 Street Drinking

1.2.8.1 The key locations for street drinking by those with street-based lifestyles (who will mostly have acquired alcohol from local off-licences) are Clapham Junction area (31% (n.8) of all hotspots), Tooting (23% (n.6) of all hotspots) and Putney (15% (n.4) of all hotspots). Most hotspots are on or near to clusters of off-licensed premises in high streets, rail stations and the public realm.

1.2.9 Fieldwork Observations

1.2.9.1 The fieldwork research revealed issues of intoxicated behaviour, littering and poor dispersal management in town centres.

1.2.9.2 Well-managed venues demonstrated that effective security and dispersal policies can mitigate cumulative impact.

1.3 Recommendations

1.3.1 Having reviewed the information contained in this report and taking into consideration the relevant principles, it is recommended that on balance, there is sufficient compelling evidence to justify the publication of a Cumulative Impact Policy to promote any of the licensing objectives in some parts of the borough of Wandsworth.

1.3.2 Whilst Clapham junction is highlighted as having the highest number of criminal and anti-social behaviour (ASB) offences, as well as the highest concentration of licensed premises, it is recognised as a major transport hub in the borough connecting to other destinations. Therefore, some incidents may not be directly linked to 'on' licensed premises or late-night refreshments venues. However, it is acknowledged that high levels of streets drinking in the area may be associated with nearby 'off' licences.

1.3.3 The Licensing Committee is asked to consider introducing a cumulative impact policy in the following areas of the Borough:

- **Tooting Broadway** area of interest - Sale of alcohol for consumption 'off' the premises only ('Off' licence)
- **Clapham Junction** area of interest - Sale of alcohol for consumption 'off' the premises only ('Off' licence)

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- **Putney High Street** area of interest – Premises providing Late Night Refreshments only (The sale of hot food and drinks only between 23:00 hours and 05:00 am).

1.3.4 If approved, the Licensing Authority will carry out a twelve week (three months) public consultation on the proposed Cumulative Impact Assessment.

1.3.5 If the Licensing Committee decides to consult on publishing one or more cumulative impact assessments for the areas as set out above, it should consider what the boundaries would be. A robust way of doing this is to use the crime and disorder and ASB maps where the hotspots show a concentration of incidents, combined with concentrations of licensed premises shown within each area of interest.

2. Introduction

2.1 Overview of Cumulative Impact Assessments (CIAs)

2.1.1 As of 6th April 2018, Cumulative Impact Assessments (CIAs) were introduced under Section 5A of the Licensing Act 2003 (“the Act”) via Section 141 of the Policing and Crime Act 2017. The Act sets out what a Licensing Authority must do in order to introduce a Cumulative Impact Policy (CIP), including collecting, publishing, and consulting on the evidential basis for its policy and the requirement to review the CIA (including public consultation) every three years.

2.1.2 Licensing authorities must follow statutory requirements to implement a Cumulative Impact Policy (CIP), including:

- Collecting and publishing evidence.
- Conducting public consultations.
- Reviewing the CIA every three years.

2.2 Definition:

2.2.1 Cumulative impact refers to the potential impact on the promotion of the licensing objectives due to the number of licensed premises concentrated in one area. This cumulative impact may be caused despite the best efforts of responsible licence holders and is not an indication of poorly managed premises. It is instead the combined effect of multiple premises in close proximity, and the numbers of customers being attracted to an area and their behaviour.

2.2.2 What is meant by “cumulative impact” is explained in the guidance issued under Section 182 of the 2003 Act (the S182 Guidance) as follows:

- *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*

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

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.*
- *4.23 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.*

2.3 Historical Context

2.3.1 Before 2018:

2.3.1.1 Prior to 2018, there was no statutory basis for a Council to introduce a cumulative impact policy. Licensing Authorities instead relied on Section 182 Government Guidance which stated that a significant number of licensed premises concentrated in one area was a proper matter for the Licensing Authority to take into account when developing its policy statement. This allowed an Authority to adopt a specific 'cumulative impact' policy for areas of their borough if they considered that the number, type, or density of licensed premises in one area was high or exceptional and serious problems of nuisance or disorder could occur outside or some distance from premises.

2.3.1.2 In 2016, Modern Crime Prevention Strategy was published by the Government. This included a range of measures to prevent alcohol-related crime and disorder. One of these was to put Cumulative Impact Policies "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".

2.3.2 Post 2018:

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

2.3.2.1 The Cumulative Impact Policy as previously set out in the Section 182 Guidance, was replaced by the new statutory scheme for CIAs as contained in section 5A of the 2003 Act, which came into force on 6 April 2018.

2.3.2.2 CIAs are described in Section 182 Guidance as follows:

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

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

*CIA*s do not apply to *TEN*s; 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

3.0 Legislative Requirements

3.1 *CIA* Evidence Requirements

3.1.1 The Act sets out what a licensing authority must do to publish a cumulative impact assessment, including publishing the evidential basis for its opinion, the requirement to consult and with whom and the need to review the cumulative impact assessments (including public consultation) every three years. The evidence underpinning the publication of the *CIA* must be suitable as a basis for a decision to refuse an application or impose conditions.

3.1.2 The evidence of cumulative impact on the promotion of the licensing objectives needs to relate to the problems identified in the specific area to be covered by the *CIA*. The steps to be followed in considering whether to publish a *CIA* are summarised in Section 182 Guidance, as follows:

- (a) Identify concern about crime and disorder; public safety; public nuisance or protection of children from harm in a particular location.
- (b) 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.
- (c) 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.

3.2 Consultation

3.2.1 Before adopting a Cumulative Impact Policy, the Licensing Authority is required to consult with the following:

- the chief officer of police for the area;
- the fire and rescue authority for the area;
- each local authority's Director of Public Health in England (DPH);
- persons/bodies representative of local premises licence holders;
- persons/bodies representative of local club premises certificate holders;
- persons/bodies representative of local personal licence holders; and
- persons/bodies representative of businesses and residents in its area.

3.2.2 In addition, the licensing authority can determine the extent of the consultation it should undertake in respect of a CIA (subject to the statutory requirements).

3.2.3 The Cumulative Impact Policy, in conjunction with the Cumulative Impact Assessment has the following effect:

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

3.3 Key Evidence Types

3.3.1 CIAs may relate to all relevant authorisations or only to authorisations of a kind described in the assessment e.g. for premises selling alcohol for consumption off the premises only.

3.3.2 When considering the evidence base for publishing a CIA, a licensing authority should also 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.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- 3.3.3 The evidence underpinning the publication of the CIA must be suitable as a basis for a decision to refuse an application and must be sufficiently robust to withstand any appeal against the decision of the Licensing Sub Committee by a licence applicant to a court.
- 3.3.4 The CIA to refuse an application can only be invoked if the Licensing Authority receives representations from residents, any persons, or responsible authorities under the Licensing Act 2003 regarding the granting of a new premises licence application or variation of an existing licence. If there are no representations, the Licensing Authority must grant the application in terms that are consistent with the operating schedule submitted.
- 3.3.5 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. 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.
- 3.3.6 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.

3.4 Statutory Obligations

- 3.4.1 CIAs must be part of the authority's Statement of Licensing Policy.
- 3.4.2 A licensing authority must consult on its CIA and must review it every 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.
- 3.4.3 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.

3.5 Current Status in Wandsworth

3.5.1 Licensing Committee Decision:

- 3.5.1.1 On 23rd October 2023, the committee approved the initiation of a Cumulative Impact Analysis for the Wandsworth Borough.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

3.5.1.2 A comprehensive review of potential Cumulative Impact Areas will be conducted, with evidence sources outlined in the next section of this report.

3.5.2 Evidence Collection for CIA

3.5.2.1 Data Sources

- **Licensed Premises:**
 - Locations and types of licences (Source: Wandsworth Council records).
- **Crime and Disorder:**
 - Violence against persons (VAP) data (Source: Police CRIS system).
 - Alcohol-related anti-social behaviour (ASB) reports.
- **Health and Safety:**
 - Ambulance callouts for alcohol-related incidents (Source: LAS data).
 - Alcohol-related mortality rates and deprivation levels.
- **Environmental Concerns:**
 - Noise complaints and litter data (Source: Wandsworth Council).
- **Community Insights:**
 - Surveys of residents and stakeholders.
 - Data on women's safety at night.

- **Fixed Penalty Notices**
- **Street Drinking information**

- **Fieldwork.**

3.5.3 Exceptions to Cumulative Impact Assessment

3.5.3.1 The following exceptions to any CIAs published by the licensing authority were approved by the London Borough of Wandsworth Licensing Committee on Tuesday 16th July 2024.

3.5.3.2 Premises Selling Alcohol for Consumption 'On' and 'Off' the Premises or Late-Night Refreshments

- a. Premises that are not alcohol-led and
 - i. support the people visiting the area during the day; and/or
 - ii. support the wider cultural offering in the area

- b. Small premises that only intend to operate during daytime hours, e.g. those with a capacity of fifty persons or less who only intend to operate until 11pm.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- c. Premises that are not alcohol led and intending to open at night after 11pm, where:
 - (a) A comprehensive operating schedule is offered to demonstrate that there will be no negative cumulative impact, and which offers a positive contribution to the Nighttime Economy, which may include:
 - i. Providing safe spaces for people late at night.
 - ii. Providing a robust Dispersal Policy to ensure minimum disruption to residents, using staff and door security outside the premises, directing customers in an orderly manner away from the premises and remaining outside until all customers have left the vicinity
 - iii. The adequacy of the applicant's proposals to prevent crime and disorder utilising CCTV and door supervisors as necessary
 - iv. Providing robust staff training manuals and code of conduct to delivery drivers/riders for premises that are applying to primarily offer a delivery service, to minimise noise and disturbance
 - v. Providing clear robust management plans for outdoor areas of licensed premises to reduce noise, odour, and smoke pollution to residents.
 - vi. A strong commitment to preventing violence against women and promoting women's safety at night, with steps to include and sufficient numbers of appropriately trained staff, and
 - vii. Robust steps are proposed to prevent vertical drinking with restaurant style conditions to restrict alcohol to be ancillary to the service of meals.
 - d. Instances where the applicant is applying for a new licence on substantially similar terms to a licence they have recently surrendered for a premises of comparable size in the cumulative impact policy area

3.5.3.3 Examples of factors the Licensing Authority will not consider as exceptional include but are not limited to:

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

3.5.3.4 Premises Selling Alcohol for Consumption 'off' the Premises

- a) Applications with comprehensive operating schedules that meet all the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- i. Specialist premises selling alcohol ancillary to main activity of business e.g., florist providing champagne with flowers, cheese shop selling wine to accompany cheese
- ii. conditions that no beer, lager, cider, ale or spirit mixers with an Alcohol By Volume (ABV) content of above 5.5% will be sold or offered for sale.
- iii. Instances where the applicant is applying for a new licence on substantially similar terms to a licence, they have recently surrendered for a premises of comparable size in the cumulative impact policy area.

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

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

3.5.4 Consultation Process

3.5.4.1 Stakeholders:

- Police, fire, public health officials and community representatives, persons/bodies representative of local premises licence holders; persons/bodies representative of local club premises certificate holders; persons/bodies representative of local personal licence holders;
- All Ward Councillors and local MPs
- Organisations such as the British Transport Police and NHS trusts.
- Wandsworth Safeguarding Adults Board, Wandsworth Health and Wellbeing Board, Public Health and Planning; Southwest London and St Georges Mental Health NHS Trust.
- Faith Groups.

3.5.4.2 Public Engagement:

- A 12-week public consultation will be held, supported by online postings and community surveys.

3.5.5 Financial Implications

- No financial impact is anticipated; costs will be met through licence fees.

3.5.6 Introduction to the Research

3.5.6.1 The purpose of this research report is to set out any relevant evidence that has been collected or provided during the course of this research project to assist the Licensing Committee to decide whether the impact of the number and concentration

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

of licensed premises within specific areas of Wandsworth is such that it is appropriate to publish a cumulative impact assessment for one or more areas of the borough.

3.5.6.2 The introduction and recommendations have been prepared by Caroline Sharkey, Licensing Manager for Wandsworth Council. The research and analysis included in this report was carried out by independent consultants.

3.5.7 Scope

3.5.7.1 This assessment focuses on the geographical area of the London Borough of Wandsworth, with particular attention to areas identified as having a high density of licensed premises. These areas include the town centres and hospitality hubs of Wandsworth High Street, Putney High Street, Clapham Junction, Tooting Broadway and Central Balham, all of which include a number of pubs, bars, nightclubs and restaurants. The scope covers all types of licensed premises under the Licensing Act 2003, including those licensed for the sale of alcohol, provision of late-night refreshment and regulated entertainment.

3.5.8 Objectives

5.5.8.1 The main objectives of this research into cumulative impact are:

- To analyse the current situation regarding the number and type of licensed premises in the designated areas of Wandsworth.
- To evaluate the cumulative impact of these premises on crime and disorder, public safety, public nuisance and the protection of children from harm.
- To gather and incorporate feedback from key stakeholders, including residents, businesses and statutory bodies such as the local authority and Met Police.
- To provide an evidence base to inform Wandsworth Council's licensing committee in relation to its decision on whether to consult on publishing a cumulative impact assessment.

3.5.9 Policy Context

3.5.9.1 Local Licensing Policy

3.5.9.1.1 Wandsworth Council's current licensing policy sets out the approach to managing the sale of alcohol, provision of late-night refreshment and regulated entertainment within the borough. The policy emphasises the importance of balancing the needs of the local economy and the night-time economy with the necessity to protect residents and visitors from adverse impacts associated with a high concentration of licensed premises.

3.5.9.1.2 Key components of Wandsworth Council's licensing policy include:

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- Encouraging responsible management and operation of licensed premises.
- Implementing measures to prevent crime and disorder.
- Ensuring public safety through adherence to licensing conditions.
- Reducing public nuisance by managing noise and anti-social behaviour.
- Protecting children from harm by restricting access to licensed premises and ensuring compliance with age verification policies.

3.5.9.2 Relevant Local Strategies

3.5.9.2.1 In addition to the statement of licensing policy, several local strategies and initiatives intersect with the objectives of the CIA, including:

3.5.9.2.2 Night Time Strategy for London Borough of Wandsworth

Night Time, Our Time: A Night Time Strategy for Wandsworth was published in November 2023 and aims to:

- Enhance the vibrancy and economic vitality of Wandsworth's night-time economy.
- Promote a diverse range of night-time activities that are safe and inclusive.
- Support local businesses, cultural venues and community events.
- Improve infrastructure and public services to ensure a pleasant night-time experience.

3.5.9.2.3 Considerations: *Night Time, Our Time: A Night Time Strategy for Wandsworth*

- *Night Time, Our Time: A Night Time Strategy for Wandsworth* aims to create an inclusive, vibrant, and safe night-time environment while fostering economic growth, cultural richness, and community well-being. When deciding whether to consult on a Cumulative Impact Assessment (CIA), the following ambitions of the strategy may be useful to consider:

a) Restricting licensing flexibility:

- The strategy promotes diverse activities at night, including cultural, retail and leisure uses. A CIA's stricter licensing controls might deter new businesses, particularly independent operators that may not be able to afford the additional legal costs that CIAs can incur, limiting the diversity of night-time offerings.

b) Economic growth:

- The strategy underscores the economic importance of the night economy, estimated at £1 billion annually. A CIA might slow the growth of sectors like hospitality and entertainment by imposing barriers to obtaining licences, potentially reducing investment and employment opportunities.

c) Balance between safety and vibrancy:

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- CIAs aim to improve safety by reducing incidents tied to alcohol-related antisocial behaviour. However, stringent controls could discourage the late-night economy's vibrancy, potentially leading to underutilised areas and a perception of reduced night-time vitality.

d) Conflicts with transport and accessibility goals:

- Reduced licensing opportunities may undermine efforts to create hubs of activity, which the strategy identifies as crucial for public transport utilisation and the safety of night workers and patrons.

e) Impact on high streets and local centres:

- The strategy advocates extending hours and promoting night-time use of high streets. As a CIA applies to licensing variations as well as new applications, CIAs could discourage businesses from pursuing extended operations, limiting the potential revitalisation of these spaces.

3.5.9.2.4 However, in support of *the Night Time, Our Time: A Night Time Strategy for Wandsworth*, the Council has stated in its Statement of the Licensing Policy that the Licensing Authority will encourage applications for premises where a comprehensive operating schedule is offered to demonstrate that there will be no negative impact to the local area and which offers a positive contribution to the Night Time Economy, which may include:

- Providing safe spaces and safe havens for people late at night.
- Policies and proposals on how customers will arrive and leave the premises and the use of public transport, taxis etc.
- Providing a robust Dispersal Policy to ensure minimum disruption to residents, using staff and door security outside the premises, directing customers in an orderly manner away from the premises and remaining outside until all customers have left the vicinity.
- The adequacy of the applicant's proposals to prevent crime and disorder utilising CCTV and door supervisors as necessary.
- Providing clear robust management plans for outdoor areas of licensed premises to reduce noise, odour, and smoke pollution to residents.
- Providing robust staff training manuals and code of conduct to delivery drivers/riders for premises that are applying to primarily offer a delivery service, to minimise noise and disturbance.
- A strong commitment to preventing violence against women and promoting women's safety at night, with steps to include sexual harassment awareness and sufficient numbers of appropriately trained staff.
- Robust steps are proposed to prevent vertical drinking with restaurant style conditions to restrict alcohol to be ancillary to the service of meals, and
- Ensure robust measures are implemented to ensure safety of staff whilst on the premises.

3.5.9.3 Other Relevant Strategies:

- **Community Safety Strategy:** Aims to reduce crime and anti-social behaviour within the borough.
- **Public Health Strategy:** Focuses on reducing alcohol-related harm and promoting health and well-being.
- **The Local Plan:** Sets out policies and guidance for the development of the borough over the plan period of 2023 to 2038. It sets out the Council's proposed Vision, Objectives and Spatial Strategy.

3.5.9.3.1 These strategies provide a broader context for understanding the cumulative impact of licensed premises and highlight the integrated approach required to address the associated challenges effectively.

4. Research into Cumulative Impact

4(a) Methodology

4.1 Engagement

4.1.1 In September 2024, a series of interviews were conducted with key stakeholders, including representatives from the Police, Community Safety, Rough Sleeping services and Public Health, to gather their perspectives on whether cumulative impact is evident in any areas of Wandsworth. These discussions provided valuable insights into the interplay between licensed premises, local safety and public health concerns, contributing to a comprehensive understanding of the borough's unique challenges and priorities.

4.2 Crime and ASB data

4.2.1 The crime and ASB data analysed for this research is 'recorded' crimes. This differs from 'reported' (which, for varied reasons, may not always be recorded). The incidents may or may not have resulted in prosecution or conviction. Recorded data is used because it is the most representative of what is happening in terms of 'real world' incidents.

4.2.2 However, it should also be noted that the results of the most recent Crime Survey of England and Wales, reporting on the year ending March 2024, identified that only about 40% of crime and ASB is reported to police, and reporting rates vary by incident type. ASB is particularly underreported, and only 15-20% of victims of sexual violence report it to the police.

4.2.3 Yet, despite this, it remains reasonable to say that recorded crime and ASB data is the best measure of any possible cumulative impact because it is the most consistently recorded data that exists for the purposes of conducting cumulative impact research.

4.2.4 All crime and ASB types are anonymised and nearly all of these come with an *easting* (X) and *northing* (Y) location. This allows the mapping of the recorded offences at a very small scale. However, *sexual offences*, due to the sensitivity of the data, are only provided at ward level. As a result, these maps are very broad, and it is therefore not possible to offer the granular detail seen in the other crime categories.

4.2.5 For the purposes of this cumulative impact research report, crime and ASB incidents have been analysed over seven days and related to incidents occurring between 1st December 2023 and 30 November 2024.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- 4.2.6 The approach started with a total figure for *overall* crime in the borough and then reduced this to those incident types that may be linked to the operation of licensed premises or the behaviour of their customers within their vicinity.
- 4.2.7 Crime and ASB types were excluded that are not reflective of issues relating to licensed premises and/or street drinking and the evening/night-time economy. For example, types of *theft* (such as ‘blackmail’) or ‘vehicle offences’ have been removed. Likewise, ‘arson’ or certain *violence against the person* (VAP) offences (such as ‘sending letters with the intention to cause distress or anxiety’) have also been removed.
- 4.2.8 Therefore, the figure for crime within this CIA report is not the total figure of all crimes with the London Borough of Wandsworth but rather the crime that is relevant to consider in relation to cumulative impact, as per the government guidance on this subject.

4.3 London Ambulance Service data

- 4.3.1 This section is based on ambulance call-out data to Wandsworth borough between 1st April, 2023 and 31st March 2024 provided by the London Ambulance Service (LAS). Unfortunately, this is provided to a limited level of granularity and only at lower super output area (LSOA) geography through the MOPAC / GLA SafeStats platform. This is to protect patient confidentiality.
- 4.3.2 LAS data has been filtered to only include those ‘alcohol-related’ callouts that are also marked ‘paramedic derived’. This is almost certainly an *underestimate* of callouts due to alcohol, as evidence suggests that paramedics often mark down the primary reason for the callout – assault, collapse, fall, etc., but don’t have time to fill out the secondary details about whether they believe that alcohol was involved.
- 4.3.3 LAS data also includes *all* alcohol-related ambulance callouts so there may be multiple alcohol-related ambulance callouts to the same incident included.
- 4.3.4 The LAS data available on SafeStats is still based on the LSOA boundaries from 2011. The corresponding ward boundaries are also from before the boundary changes took place in Wandsworth in 2022. However, this does not materially alter the overall findings.
- 4.3.5 The LAS data does not give eastings and northings, so it is not possible to ascertain if, for example, an alcohol-related ambulance callout is to a residential property or to another location.

4.4 Noise data

- 4.4.1 The noise data used in this report was sourced from the London Borough of Wandsworth for the period 1st April 2023 to 31st March 2024. This data was

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

provided to the council's Insight and Analytics Team by the Regulatory Services Partnership. The data was delivered in both tabular and mapped formats; however, raw data was not made available for this analysis.

- 4.4.2 In addition to the council-provided noise data, this section incorporates data derived from Anti-Social Behaviour (ASB) records supplied by the Metropolitan Police Service. While this supplementary data offers additional context, it is important to note that noise-related incidents are not consistently reported to the police, which introduces further limitations. Furthermore, it is possible that some noise complaints may have been reported to both the council and the police, leading to potential duplication.
- 4.4.3 The noise data presented in this report provides some insights into noise-related incidents within the borough; however, it is not comprehensive.

Consequently, while the data contributes to understanding noise-related issues, it should be interpreted as indicative rather than exhaustive.

4.5 Street drinking data

- 4.5.1 The researchers requested a list of sites from the Community Safety team in Wandsworth where those with street-based lifestyles regularly congregate to create 'street drinking hotspots'. These were then mapped against off-licence locations. (Street drinkers with street-based lifestyles tend to buy alcohol close to where they drink it, often within 100 metres).
- 4.5.2 It is important to note that not every street drinking hotspot is known to the community safety team and police. Based on the researchers' experience elsewhere, there are likely to be a number of other smaller and/or more hidden hotspots. Those mapped tend to be those that are most high profile, create the most challenges and require the greatest attention to detail for cleansing of street drinking detritus (cans, bottles, wrappers), bedding and human waste removal.

4.6 Licensed premises data

- 4.6.1 The figures for premises numbers come from the council's licensing database.
- 4.6.2 This data presented does not include gambling premises (unless they have an alcohol or entertainment licence, e.g. a casino).
- 4.6.3 Food premises are only included if they have an alcohol or entertainment licence, or in the case of takeaways, if they have a *late-night refreshment* licence (LNR) which is required to serve hot food and / or hot drink between 11pm and 5am.
- 4.6.4 There are some restaurants or takeaways in Wandsworth that offer takeaway/delivery hot food, but which cease trading before 11pm. Whilst these do not require a licence for late night refreshment, problems may still occur in the evening.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- 4.6.5 The total also includes all *off-licences* such as supermarkets, corners stores and shops licensed to sell alcohol, but does not duplicate an on-premises, such as a *pub* that is licensed for off-sales.
- 4.6.6 There are a host of '*other*' licensed places in the borough which do not fall into the 'traditional' licensed categories. These can include anything from sports stadia to colleges or church halls, as well as wholesalers and home delivery services that operate out of storage units, which is a growing national trend. It also includes open venues, such as public spaces and parks.
- 4.6.7 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.
- 4.6.8 Also, there may be premises that hold a licence but are not currently trading. This type of licence is still counted as 'live'.
- 4.6.9 Finally, all the classifications are made by the researchers to understand the balance in each location. They are not official legal classifications and there may be some premises that cross licence types, e.g. a takeaway that has seating, is still considered a takeaway if it appears to be predominantly trading as a late night refreshment premises.

4.7 Fieldwork

- 4.7.1 Two overnight audits took place on 13th and 14th September 2024. The approach to field observations for cumulative impact is for two researchers to walk around a pre-existing route covering the town centre of interest. This is then repeated until the last venues close, usually around 02:00 to 03:00 hours.
- 4.7.2 The researchers visited Tooting and Balham over the course of one night, and then Putney and Clapham Junction on the other night, alternating between the locations over the two nights of seven hours. These were the areas that provisional crime and ASB analysis and interviews with the stakeholders, such as the police, public health and licensing, had suggested were the areas where any negative impacts around licensed premises and their customers were most likely to be found.
- 4.7.3 Whilst on the observational routes, the researchers noted the behaviour of customers at licensed premises and their door supervisors (at those premises that have them), as well as any interactions between these participants in the evening and night-time economy and other users of the public realm.
- 4.7.4 The observations also focus on how customers of licensed premises behave in the public realm away from premises. Key behaviours that may indicate cumulative impact (and would adversely affect the licensing objectives) are shouting or chanting, littering, drunkenness, vomiting, urination, public defecation, aggressive behaviour, intimidation and hate crime and any form of violence.

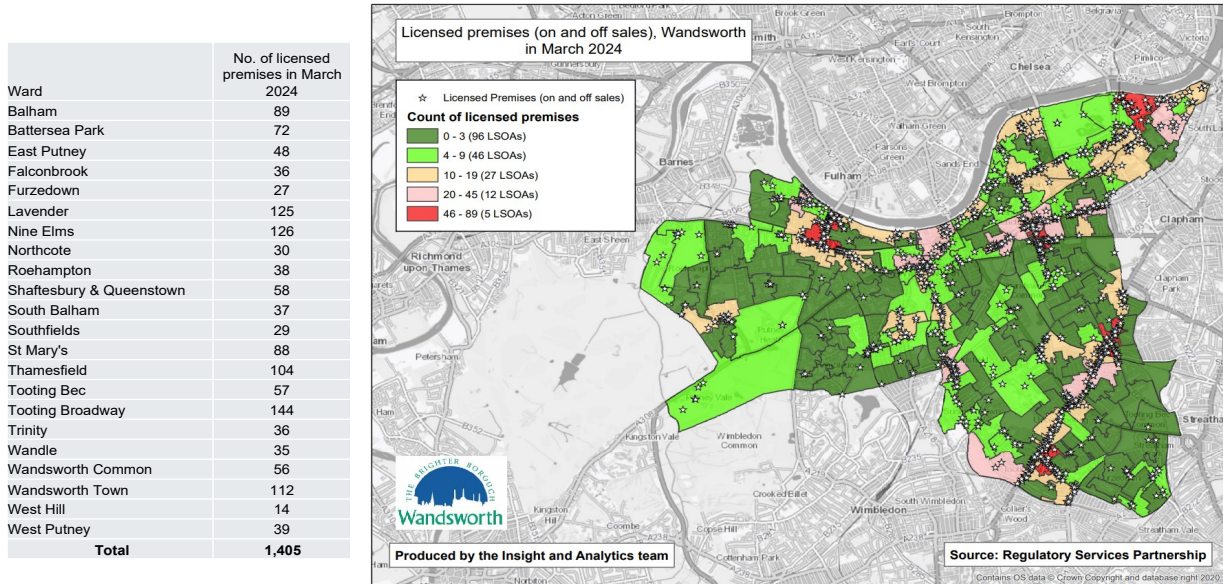
London Borough of Wandsworth: Cumulative Impact Research Report, 2024

4.7.5 Observations also note how customers of licensed premises move around the town and disperse at the end of the night, as well as how the public realm and transport infrastructure copes with the number of users and their behaviour.

4b. Assessment of Cumulative Impact

4.8 Licensed Premises March 2024

Official



4.8.1 The map above indicates how many licensed premises there are in each Local Super Output Area (LSOAs) in the London Borough of Wandsworth.

4.8.2 There are five areas with LSOAs that have the highest number of licensed premises according to the scale shown on the map (red areas on the map, indicating between 46 and 89 licensed premises). These red LSOAs fall within the five areas of interest listed in the table below.

4.8.3 The ‘areas of interest’ relate to clusters of LSOAs, rather than a group of entire wards. This is because there may be some LSOAs within the same ward where there are neither an accumulation of licensed premises, nor a significant volume of crime, and therefore would not be relevant for consideration in a CIA.

Area of interest	No. Premises licences
Balham	89
Tooting Broadway	84
Wandsworth Town	112
Clapham Junction	124
Putney	191

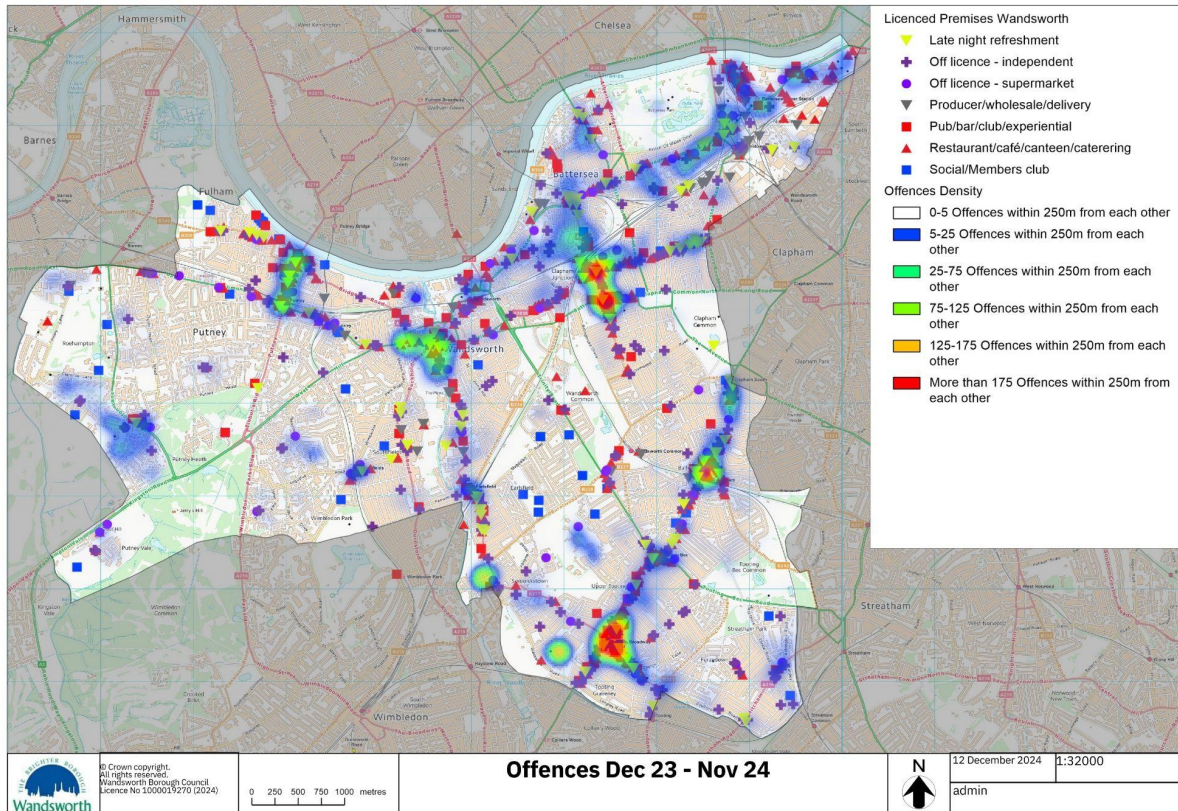
4.9 Crime and ASB

4.9.1 Crime in the Borough

4.9.1.1 In line with the methodology, all offences that could not definitively be considered relevant to a Cumulative Impact Assessment were removed from the dataset. However, some offences that remain may still not be directly relevant. For instance, while the dataset includes all recorded instances of sexual assault, not all of these will necessarily be alcohol-related incidents. It is not possible to determine which offences are alcohol-related, and as such, all have been included in the statistics presented.

4.9.1.2 Conversely, it is a recognised phenomenon that not all offences are reported, across all categories of crime. Taking these factors into account, it is not feasible to provide a completely accurate set of statistics relevant to cumulative impact considerations. Nonetheless, every effort has been made to present the most accurate and comprehensive picture possible, given the available data.

4.9.1.3 During the period from 1st December 2023 to 30th November 2024, a total of 5,110 crimes were recorded across the whole borough. The map below offers an overview of the locations and clustering of offences:

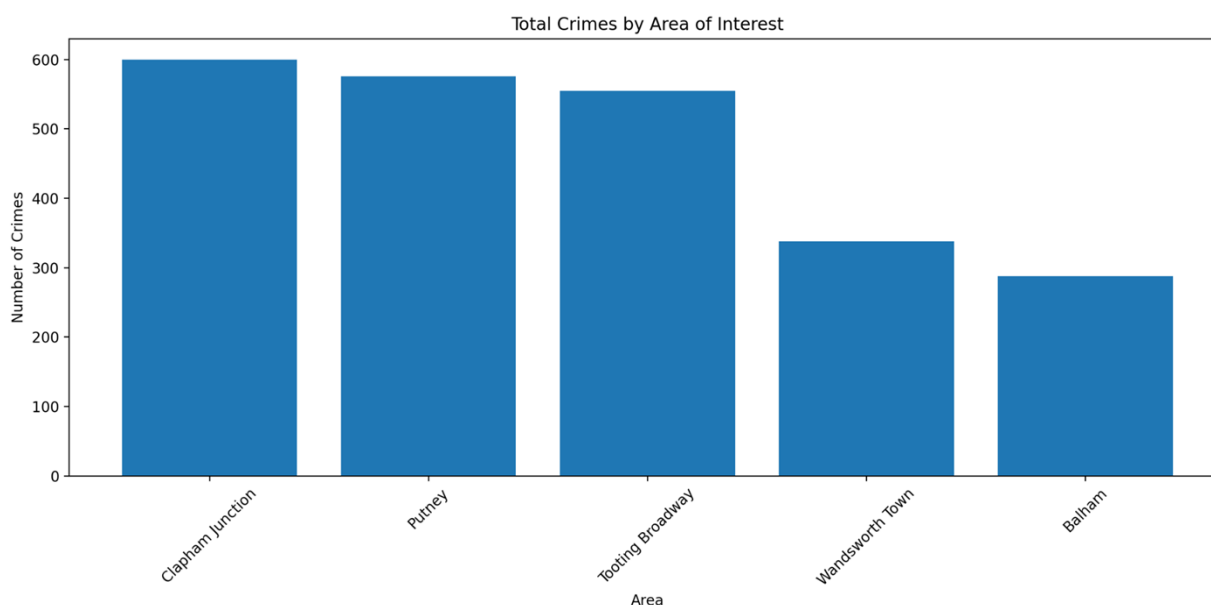


London Borough of Wandsworth: Cumulative Impact Research Report, 2024

4.9.1.4 The whole borough hotspot map of criminal offences indicates several clusters of offences across a 12-month period. These are:

1. Clapham Junction (600 incidents)
2. Putney (576 incidents)
3. Tooting Broadway (555 incidents)
4. Wandsworth High Street (338 incidents)
5. Central Balham (288 incidents)

4.9.1.5 This information is visualised below:



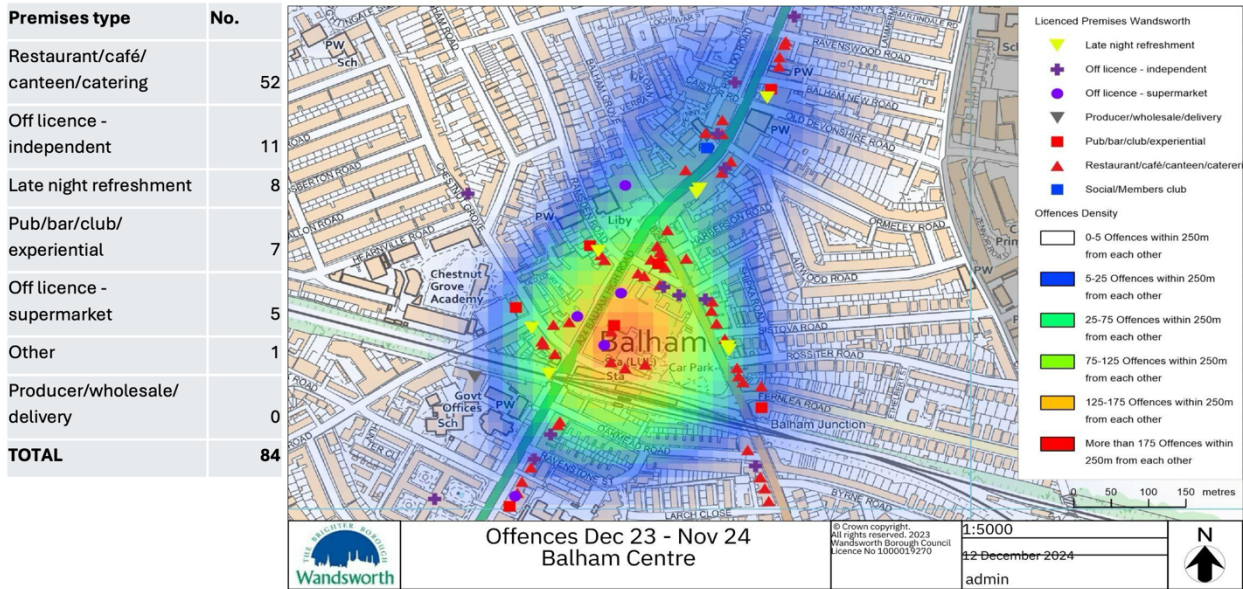
Crime Type	Clapham Junction	Putney	Tooting Broadway	Wandsworth Town	Balham	All of Borough
Theft	195	105	170	67	88	1116
Public Order Offences	106	119	86	63	56	904
Violence Against the Person	80	103	84	44	37	872
Arson and Criminal Damage	55	103	39	56	32	751
Drugs Offences	85	71	86	40	19	614
Robbery	54	37	51	31	42	437
Sexual Offences	0	25	22	15	8	260
Possession of Weapons	20	6	10	16	2	101
Other	5	7	7	6	4	55

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

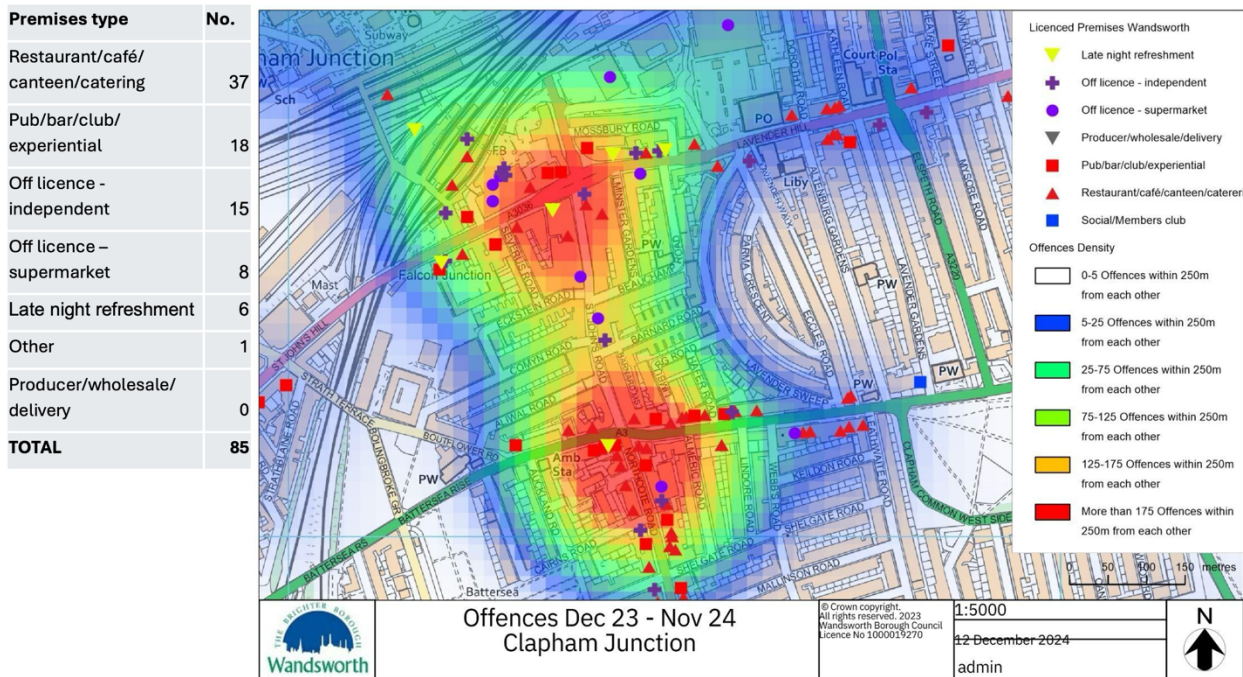
Total Offences	600	576	555	338	288	5110
% of Borough Crime	11.7%	11.3%	10.9%	6.6%	5.6%	100%

4.9.1.6 Crime Heat Maps for Areas with a Density of Licensed Premises

(a) Central Balham



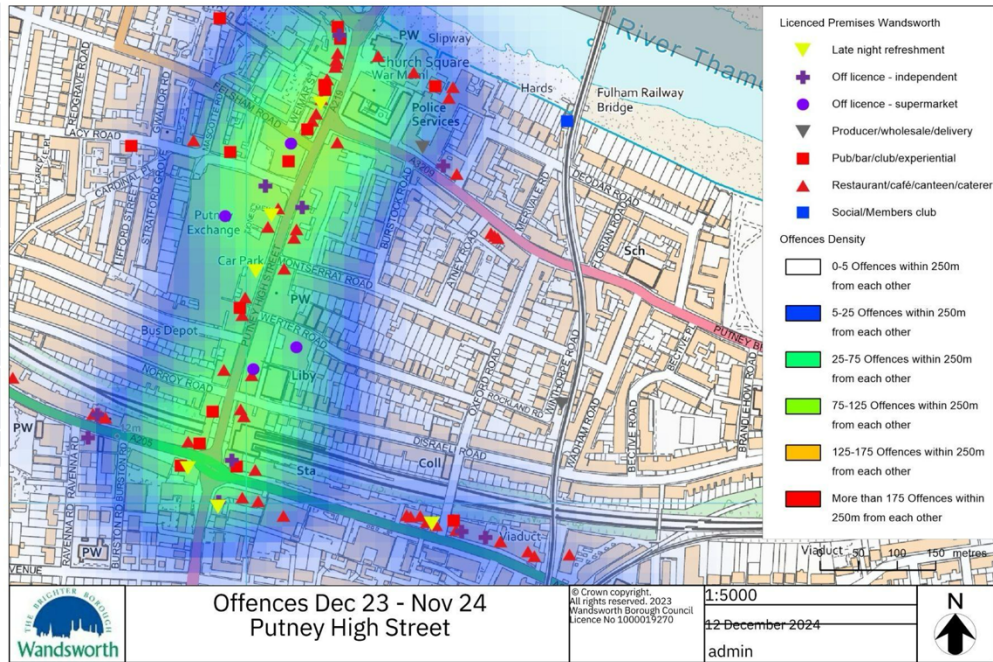
(b) Clapham Junction



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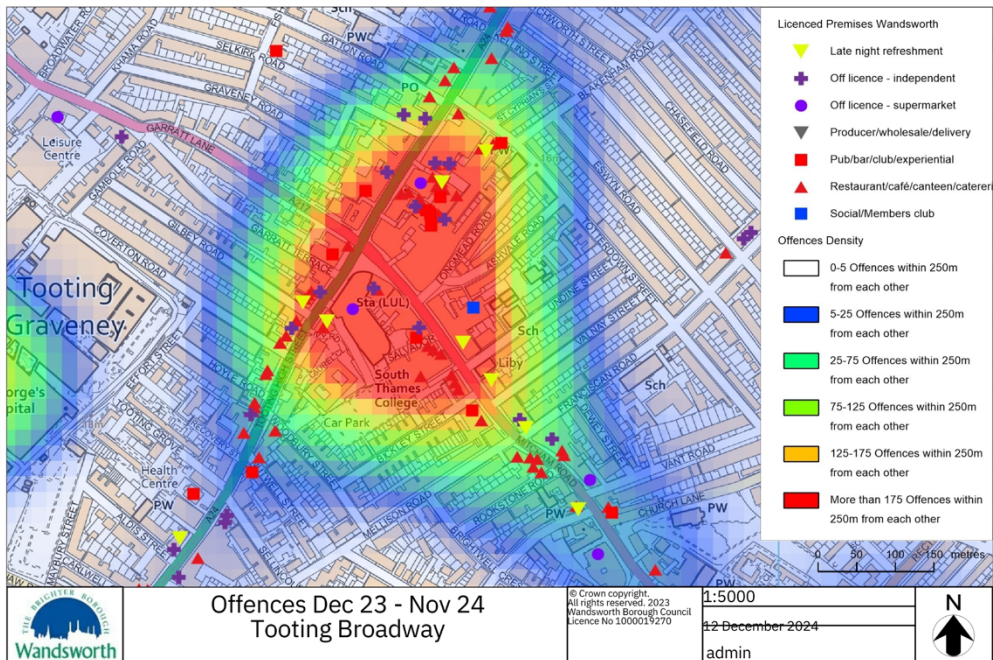
(c) Putney

Premises type	No.
Restaurant/café/canteen/catering	35
Pub/bar/club/experiential	14
Off licence - independent	6
Late night refreshment	5
Off licence – supermarket	4
Other	3
Producer/wholesale/delivery	1
TOTAL	68



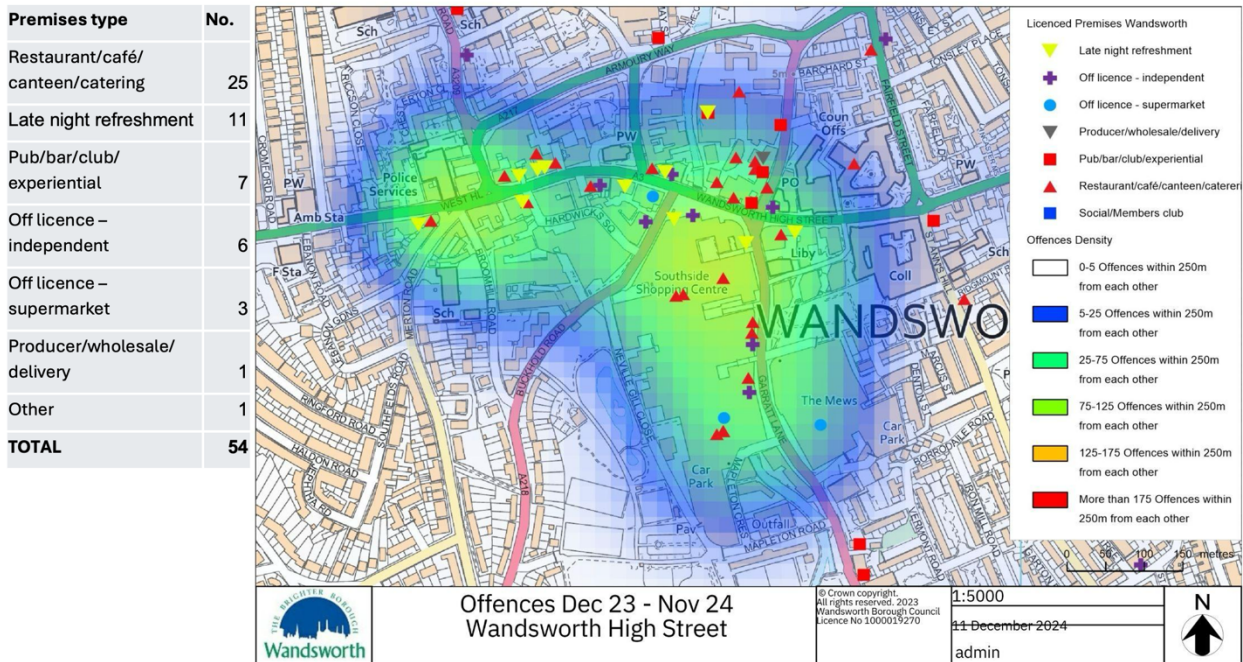
(d) Tooting Broadway

Premises type	No.
Restaurant/café/canteen/catering	56
Off licence - independent	10
Pub/bar/club/experiential	9
Late night refreshment	6
Off licence – supermarket	2
Other	1
Producer/wholesale/delivery	0
TOTAL	84



London Borough of Wandsworth: Cumulative Impact Research Report, 2024

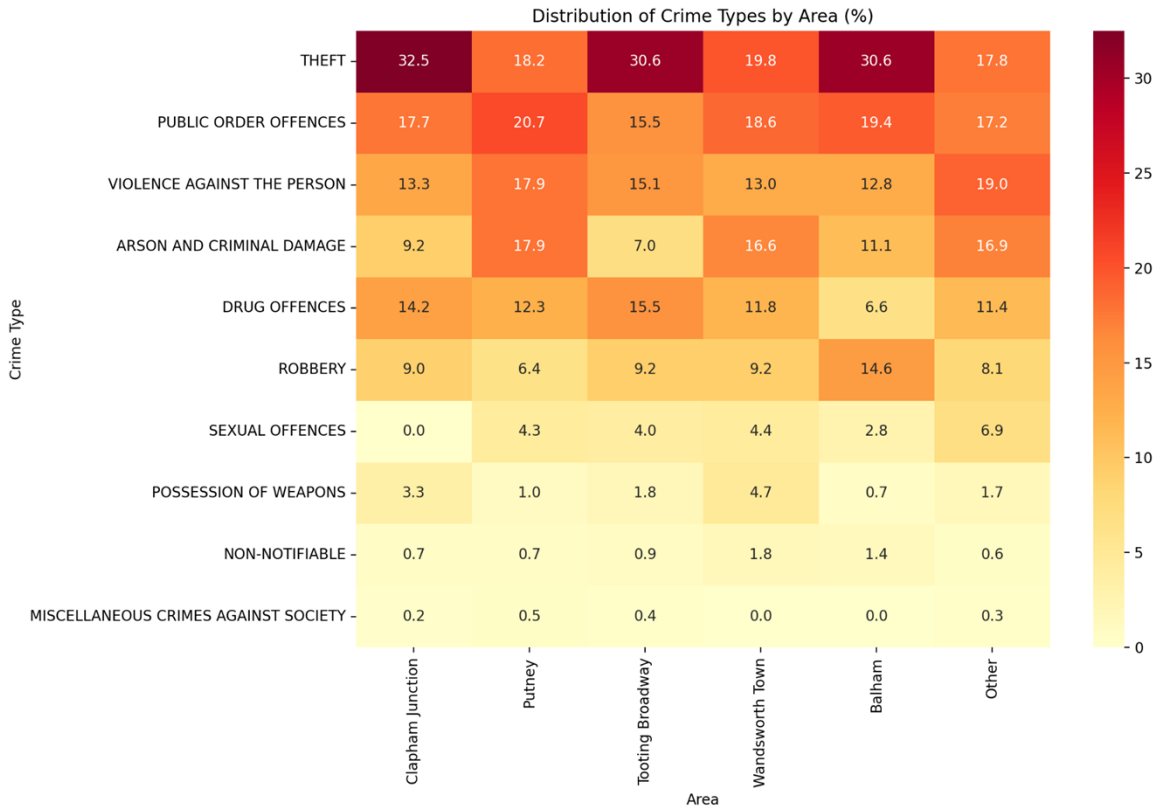
(e) Wandsworth Town



Crime Distribution Matrix:

4.9.1.7 The crime distribution matrix below helps to visualise the most prevalent relevant offence types in each area of interest. The numbers in each cell show what percentage that particular crime type makes up of all crimes in that area, while the colour intensity indicates the percentage, with darker red indicating a higher percentage.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024



4.9.1.8 Key insights:

(a) Theft

- Clapham Junction has the highest proportion (32.5%).
- Tooting Broadway (30.6%) and Balham (30.6%) are also areas where theft is a large proportion of the offences.
- Putney (18.2%) and Wandsworth Town (19.8%) see significantly lower proportions of theft than the other three areas of interest.
- All five areas of interest see proportionately more theft as a percentage of overall offences than the borough average (17.8% of offences).

(b) Public Order

- This makes up the highest proportion of crime in Putney (20.7%). This is the only area of interest where Public Order incidents are more prevalent than theft.
- In Tooting Broadway, Public Order offences are less prevalent than the borough average, with only 15.5% of offences in Tooting Broadway being Public Order offences (17.2 across the borough).

(c) Violence Against the Person

- This is relatively consistent across all areas of interest, with Putney having the highest proportion of all areas of interest (17.9%) and Balham the lowest (12.8%).

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- Interestingly, all areas of interest experiences a lower proportion of Violence Against the Person offences than the borough average (19.0%).

(d) Arson and Criminal Damage

- This offence type shows significant variation with the highest proportion being in Putney (17.9%) and the lowest in Tooting Broadway (7.0%).
- Again, all areas of interest were lower than the borough average of 16.9%, except for Putney.

(e) Drugs Offences

- The highest concentrations of drugs offences are found in Tooting Broadway (15.5%) and Clapham Junction (14.2%).
- They are notably lower in Balham (6.6%). This is the only area of interest where drugs offences made up a smaller proportion of offences than the borough average of 11.4%.

(f) Robbery

- The highest proportion of robbery offences in an area of interest is in Balham (14.6%). It is the only area of interest that is significantly higher than the borough average of 8.1% of offences.
- The lowest proportion of robberies were seen in Putney (6.4%).

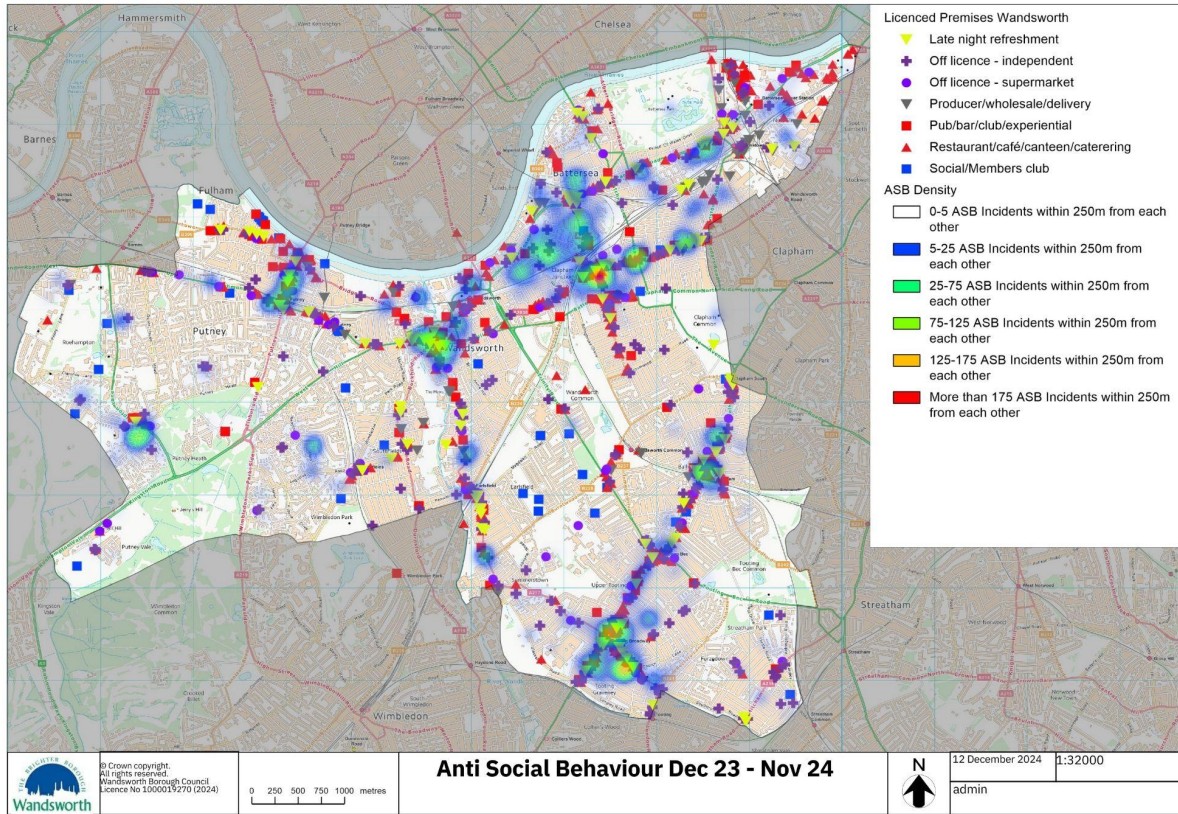
(G) Less frequent crimes

- All other crimes generally make up less than 5% of crimes in each area. These show more variation partly because the small numbers make percentages more volatile.

(h) Character of crime in each area

- Clapham Junction and Tooting Broadway show similar patterns with high theft percentages.
- Putney shows a more even distribution across the major crime types.
- Balham has a distinctive pattern with high theft and robbery percentages.
- Wandsworth Town shows relatively balanced percentages across crime types.

4.9.2 ASB in the Borough

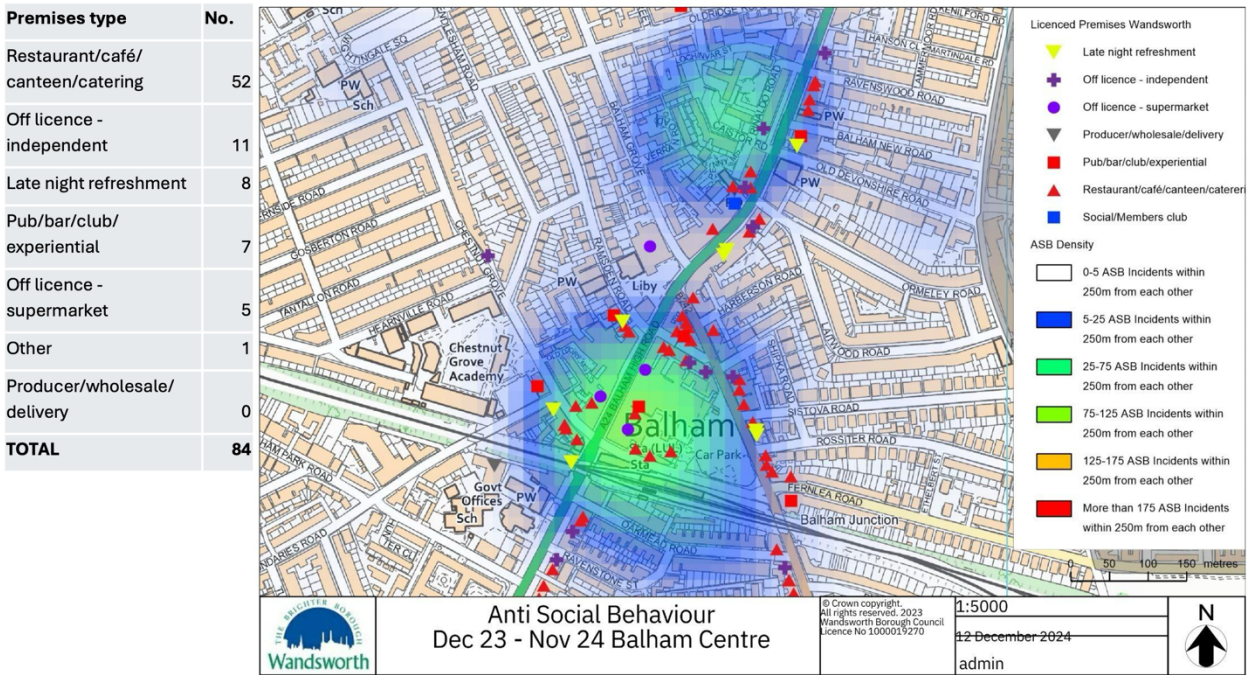


4.9.2.1 The whole borough hotspot map of ASB incidents indicate several clusters of incidents across a 12-month period. These are:

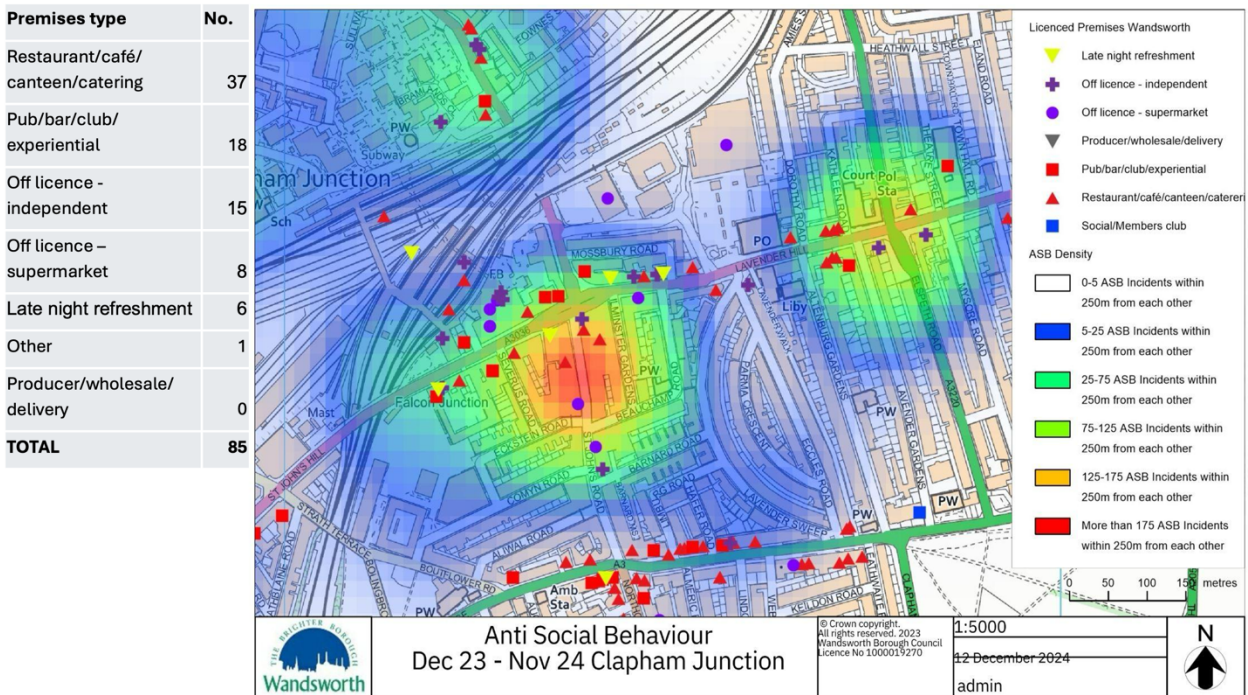
1. Clapham Junction (828 incidents)
2. Tooting Broadway (508 incidents)
3. Wandsworth High Street (374 incidents)
4. Putney (276 incidents)
5. Central Balham (254 incidents)

4.9.2.2 ASB Heat Maps for Areas with a Density of Licensed Premises

(a) Central Balham

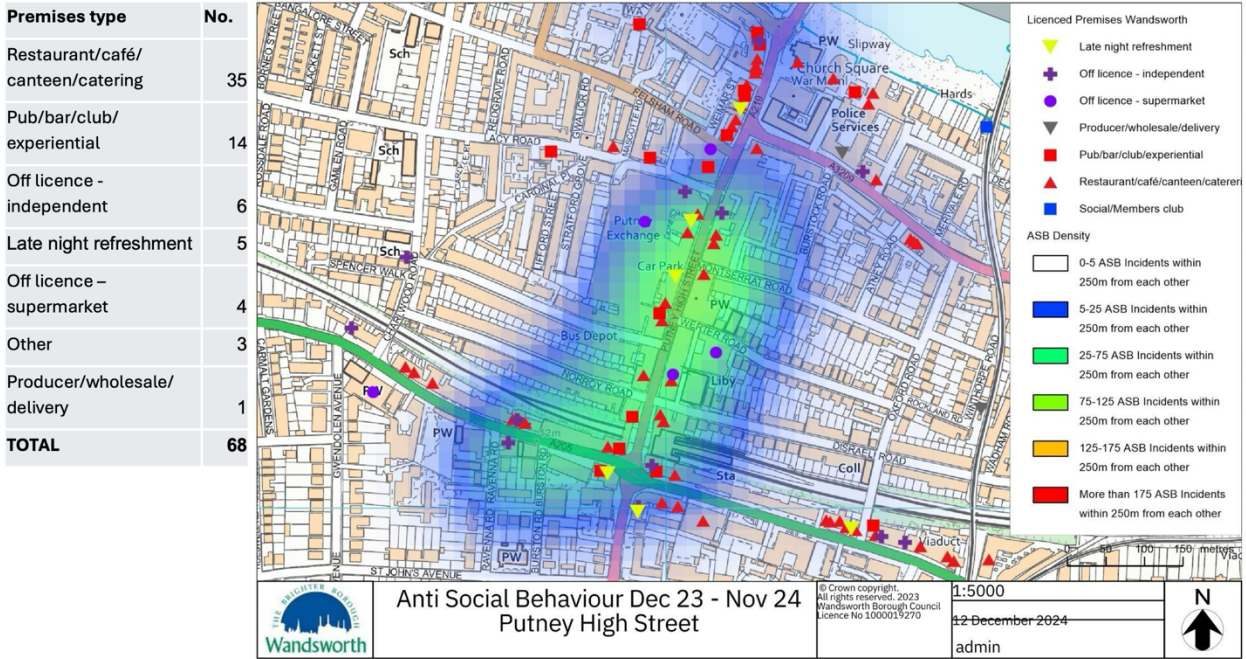


(b) Clapham Junction

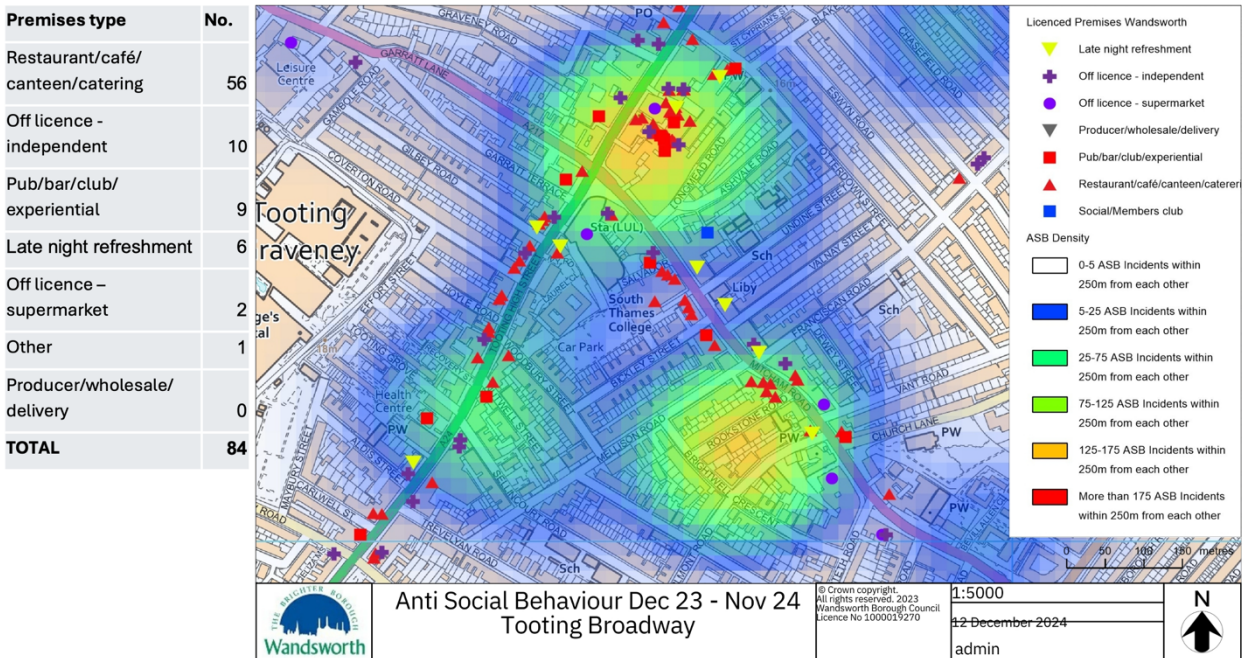


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(c) Putney

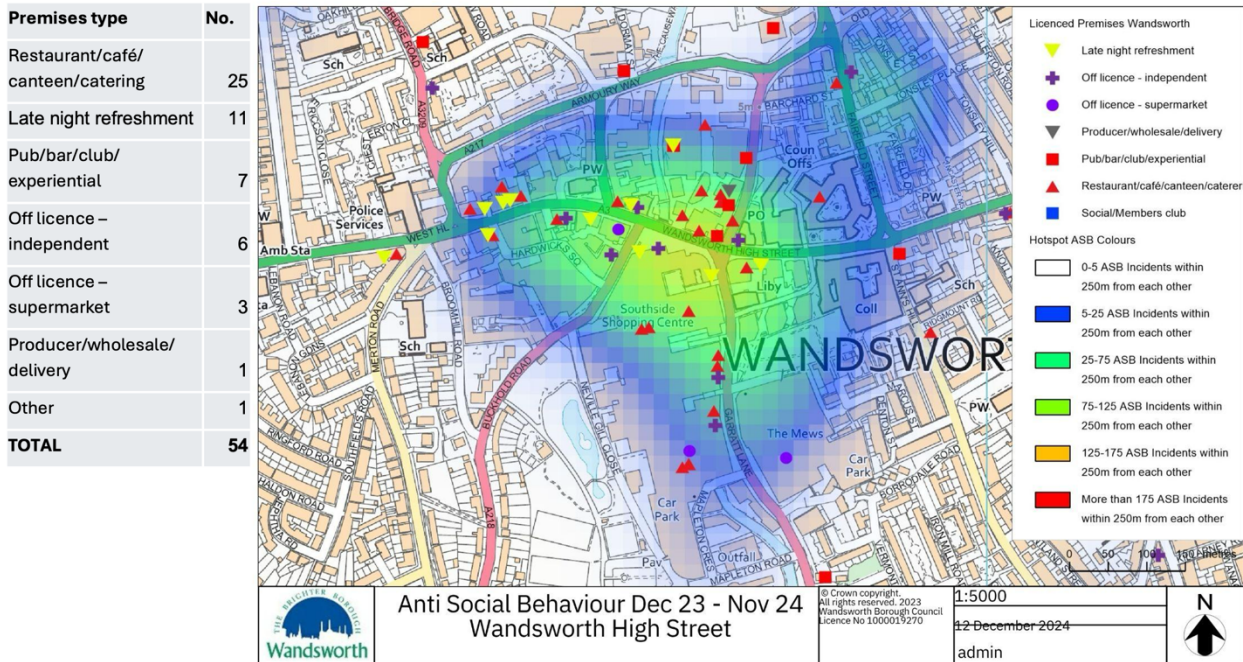


(d) Tooting Broadway

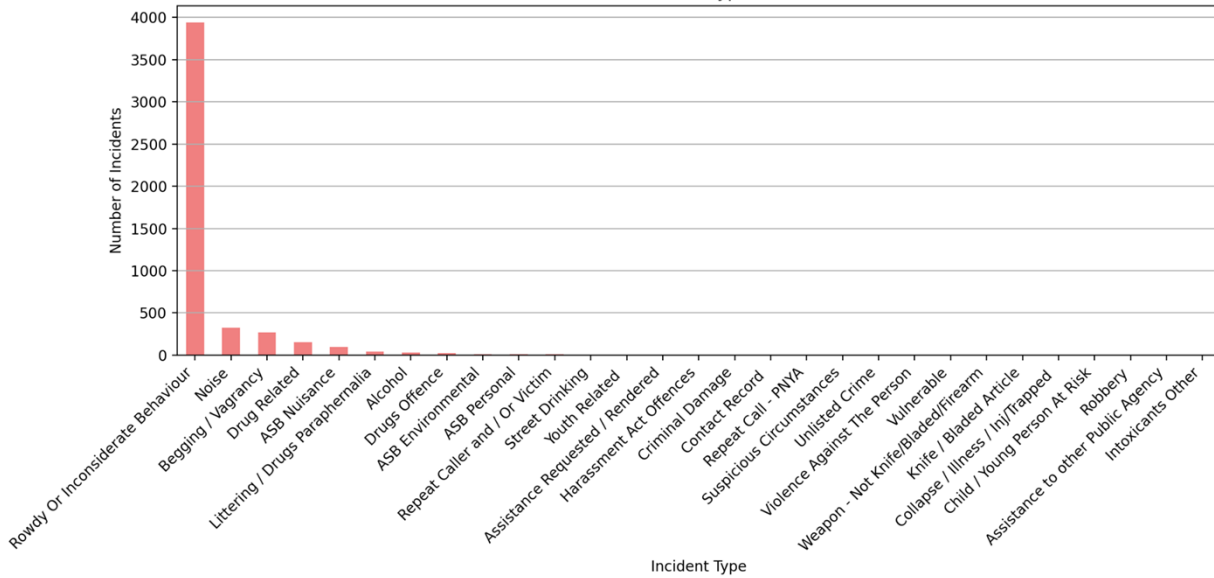


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(e) Wandsworth Town



Distribution of Incident Types in Wandsworth



4.9.2.3 The most common incident types are:

- Rowdy or Inconsiderate Behaviour (3,943 incidents)
- Noise (322 incidents)
- Begging / Vagrancy (267 incidents)
- Drug Related (155 incidents)

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- ASB Nuisance (96 incidents)

4.9.2.4 It should be noted that the noise incidents recorded are only the instances that this issue was reported to the Met Police, not via the council, which is analysed separately in the dedicated noise section below. The number of noise incidents is therefore greater than that represented in this ASB section of the report.

4.9.2.5 All other ASB incident types occurred less than once per week on average across the whole borough.

4.9.2.6 Area ASB Focus: Clapham Junction

4.9.2.6.1 Clapham Junction had 828 incidents across the 12 month period analysed. The top three incident types are shown below. Rowdy or inconsiderate behaviour accounts for most incidents. There are an average of 53.1 incidents of this type recorded per month. The next two most prevalent ASB incident types are Begging/Vagrancy, with an average of 7.3 recorded incidents per month, and Noise, with an average of 4.5 recorded incidents per month.

4.9.2.6.2 The peak hour for incidents in this area is 11:00 hours with 53 incidents (6.4% of the area's incidents). As part of the analysis process, the ASB categories that do not correlate to alcohol were removed, but all those that may involve alcohol were included in the analysis. Given that the peak time of day is 11:00 hours, if these incidents do involve alcohol - and there is no way we are able to discern this - then the alcohol would likely have been purchased through an off licence rather than in an on-licensed premises, since most on-licensed premises are not open for long before 11:00 hours.

Incident type	Number of incidents	% of ASB incidents
Rowdy or Inconsiderate Behaviour	637	76.9%
Begging/Vagrancy	87	10.5%
Noise	54	6.5%

4.9.2.6.3 There are four locations in the Clapham Junction area at which more than 2 incidents a month take place. These are:

- Santander - around the bank/bike hire station (95 incidents in the 12-month period)
- Lavender Hill Police Station (77 incidents)
- Inside Clapham Junction station (32 incidents)
- Near 65 Dorothy Road (residential address - 25 incidents)

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

4.9.2.7 Area ASB Focus: Tooting Broadway

4.9.2.7.1 Tooting Broadway had 508 incidents across the 12-month period analysed. The top three incident types are shown below. Rowdy or inconsiderate behaviour accounts for the vast majority of most incidents. There are 34.7 incidents of this type recorded per month. The next two most prevalent ASB incident types are Drugs and Begging/Vagrancy, with around 2 incidents each recorded per month.

4.9.2.7.2 The peak hour for incidents in this area is 17:00 with 40 incidents (6.4% of the area's incidents).

Incident type	Number of incidents	% of ASB incidents
Rowdy or Inconsiderate Behaviour	416	81.9%
Drugs	27	5.3%
Begging/Vagrancy	23	4.5%

4.9.2.7.3 There are three locations in the Tooting Broadway area at which more than 2 incidents a month take place. Where these relate to a licensed premises, targeted support might be appropriate to consider. These are:

- Near 28 Rookstone Road (residential address - 82 incidents in 12 months)
- Near 38 Tooting High Street - possibly The Castle Public House (72 incidents)

4.9.2.8 Area ASB Focus: Wandsworth Town

4.9.2.8.1 Wandsworth Town had 374 incidents across the 12 month period analysed. The top three incident types are shown below. Again, rowdy or inconsiderate behaviour accounts for the vast majority of incidents. There are 25.3 incidents of this type recorded per month. The next two most prevalent ASB incident types are Noise (2.0 incidents per month) and Begging/Vagrancy (1.4 incidents per month).

4.9.2.8.2 The peak hour for incidents in this area is 16:00 hours with 35 incidents (9.4% of the area's incidents).

Incident type	Number of incidents	% of ASB incidents
Rowdy or inconsiderate behaviour	304	81.3%
Noise	24	6.4%
Begging/vagrancy	17	4.5%

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

4.9.2.8.3 There are two locations in Wandsworth Town at which more than 2 incidents a month take place. These are:

- Southside Shopping Centre near or in Gymnasium (25 incidents in 12 months)
- The Ram Inn (24 incidents)

4.9.2.9 Area ASB Focus: Putney

4.9.2.9.1 Putney had 276 incidents across the 12-month period analysed. The top three incident types are shown below. There are 18.8 recorded incidents of Rowdy or Inconsiderate Behaviour per month, which accounts for over 80 percent of incidents. Noise incidents are recorded at an average of 1.4 incidents per month, and Begging/Vagrancy at 1.1 incidents on average per month.

4.9.2.9.2 The peak hour for incidents in this area is 17:00 hours with 30 incidents (10.9% of the area's incidents).

Incident type	Number of incidents	% of ASB incidents
Rowdy or inconsiderate behaviour	226	81.9%
Noise	17	6.2%
Begging/vagrancy	13	4.7%

4.9.2.9.3 Putney is in close proximity to two major football club stadia - Chelsea's Stamford Bridge and Fulham's Craven Cottage. It can therefore experience greater volumes of footfall on match days. The ASB incidents for the year were analysed to review whether there was a greater number of incidents on the days where either football stadium hosted a match, or on the day of the Oxford-Cambridge boat race, which attracts spectators at pubs along the Putney riverbank. The analysis revealed that the only incident type that experienced a significant increase was Noise. On non-match days, there are an average of 0.08 noise incidents per day. On the 'special event' days, noise complaints rose around three-fold to 0.25 incidents per day. All other ASB incidents either reduced or stayed at a similar level.

4.9.2.9.4 There are two locations in the Putney area at which more than 2 incidents a month take place. These are:

- Putney High Street near The Exchange Shopping Centre (35 incidents in 12 months). Of these incidents, 30 were Rowdy or Inconsiderate Behaviour, 4 were Begging/Vagrancy and one was Drugs related. 21 incidents took

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

place in 'daytime' hours of 6:00 hours to 18:00 0, and 14 took place in 'nighttime' hours of 18:00 hours to 06:00 hours.

- Witham House, Enterprise Way (residential flat block area - 25 incidents)

4.9.2.10 Area ASB Focus: Balham

4.9.2.10.1 Balham had 276 incidents across the 12 month period analysed. The top three incident types are shown below. There are 16.9 Rowdy or Inconsiderate Behaviour incidents recorded per month, and this is again the highest volume incident type. The next two most prevalent ASB incident types are Noise (1.5 incidents per month) and Begging/Vagrancy (1.3 incidents per month).

4.9.2.10.2 The peak hour for incidents in this area is 19:00 hours with 22 incidents (8.7% of the area's incidents).

Incident type	Number of incidents	% of ASB incidents
Rowdy or inconsiderate behaviour	203	79.9%
Noise	18	7.1%
Begging/vagrancy	16	6.3%

4.9.2.10.3 There are two locations in the Balham area at which more than 2 incidents a month take place. These are:

- Near Oliver Bonas - possibly Hagen & Hyde public house (30 incidents in the 12 month period analysed)
- Caistor Road (residential area - 24 incidents)

4.9.2.11 Summary of Crime and ASB Findings

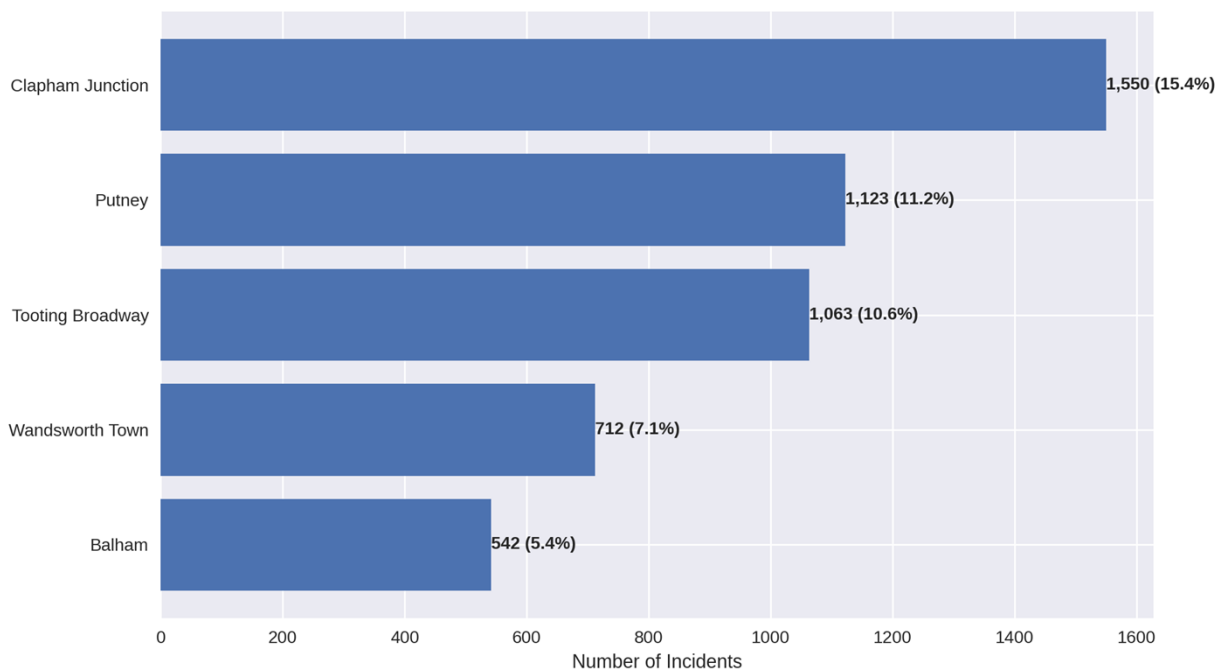
4.9.2.11.1 The table below combines all potentially relevant crime and ASB incidents in each area of interest, to provide a more cohesive overview. The size of each area is also provided in square kilometres, plus the incidents per kilometre, so that the volume of incidents can be considered in a proportionate way.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Area	Total Incidents	% of Borough	Size (km ²)	Incidents/km ²
Clapham Junction	1550	15.4%	2.01	771.1
Putney	1123	11.2%	5.2	216.0
Tooting Broadway	1063	10.6%	1.8	590.6
Wandsworth Town	712	7.1%	1.9	374.7
Balham	542	5.4%	1.7	318.8

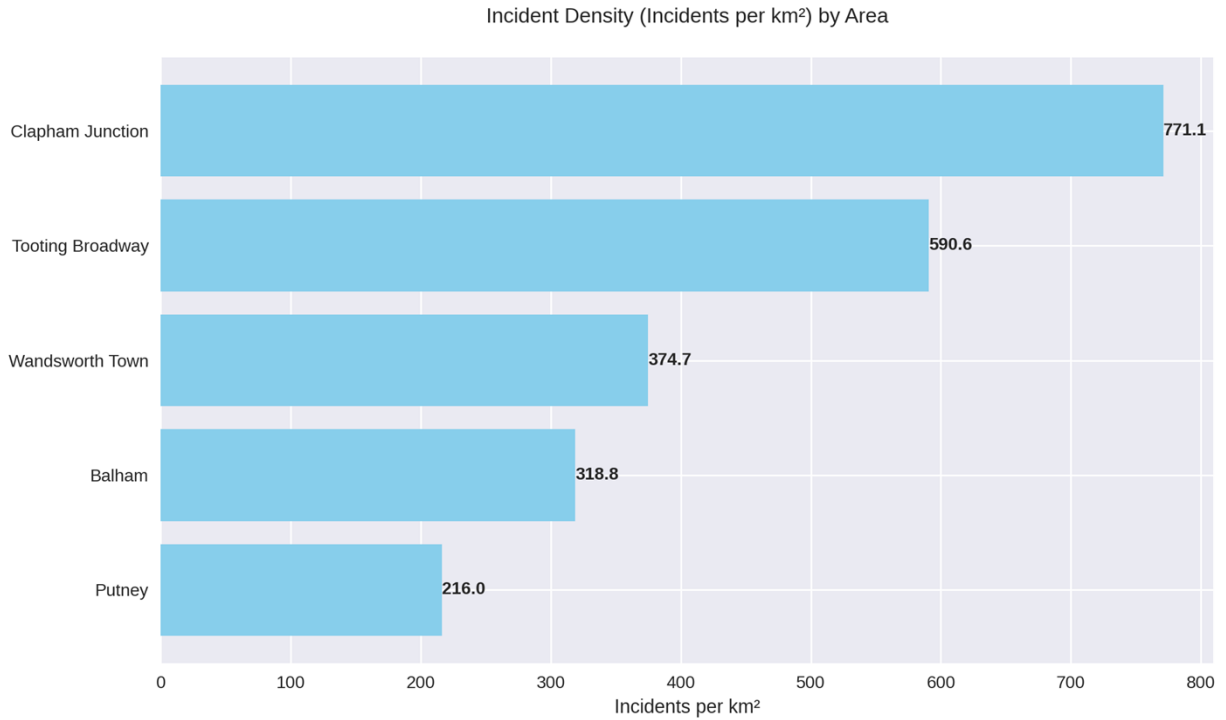
4.9.2.11.2 The following chart shows the total combined incidents by area, together with the percentage of all borough incidents that are within that area of interest.

Total Combined Incidents by Area



4.9.2.11.3 The chart below shows the incident density within each area of interest. This is important to consider because, while Putney for example has the second highest number of incidents, it is also by far the largest area analysed. For context, the average incident density across the whole borough of Wandsworth is 145.7 incidents by km².

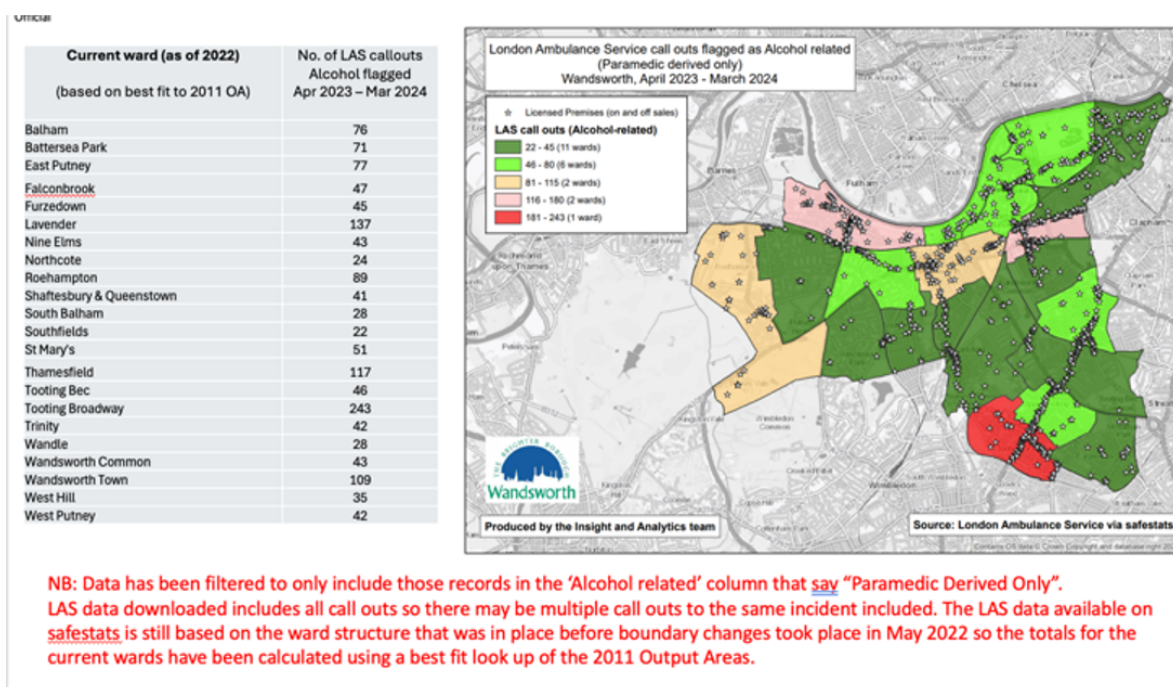
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4.9.2.11.4 The table and chart clearly show that:

- Clapham Junction has by far the highest density of incidents at 771.1 per km².
- Tooting Broadway has the second-highest density at 590.6 per km².
- Wandsworth Town and Balham have moderate densities.
- Putney, despite having a high total number of incidents, has the lowest density due to its larger geographical area.

4.10 Ambulance Data: Headline findings



4.10.1 The ambulance data was provided to the researchers at ward level only, so ward clustering that most closely related to areas of interest was used in the table below – for example, for Putney, the wards of Thamesfield, East Putney and West Putney were used.

Ward clusters most closely relating to areas of interest	No. LAS alcohol flagged callouts	% of whole borough total
Tooting Broadway	243	16.7%
Putney	236	16.2%
Clapham Junction	184	12.6%
Balham	146	10.0%
Wandsworth Town	109	7.5%
Whole Borough Total	1,456	100%

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Official

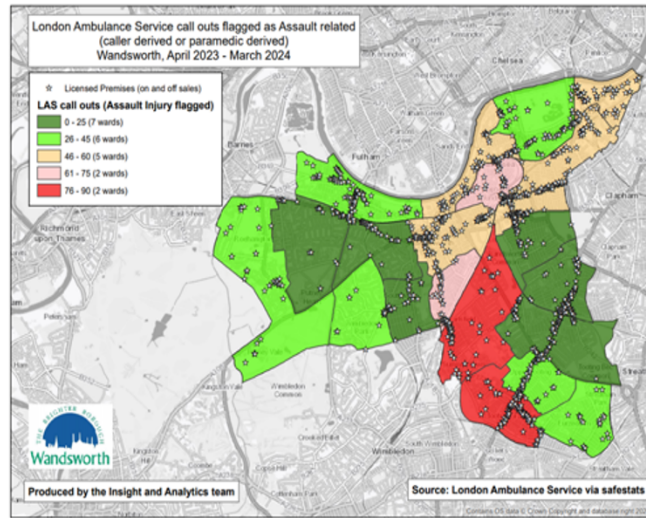
Hour of the day	Alcohol relate call outs (paramedic derived only)	Proportion of alcohol flagged calls
00	96	6.6%
01	103	7.0%
02	72	4.9%
03	42	2.9%
04	34	2.3%
05	19	1.3%
06	15	1.0%
07	15	1.0%
08	30	2.0%
09	19	1.3%
10	43	2.9%
11	34	2.3%
12	49	3.3%
13	65	4.4%
14	56	3.8%
15	74	5.1%
16	60	4.1%
17	63	4.3%
18	90	6.1%
19	89	6.1%
20	92	6.3%
21	87	5.9%
22	98	6.7%
23	119	8.1%



The highest number of alcohol related call outs over the 12 month period took place during the hours of 11pm and 1am, followed closely by 10pm and 12am. This is particularly evident on a Saturday night when almost a quarter (23%) of all alcohol related call outs took place during the hours of 11pm and 1am. However, alcohol related call outs that took place Monday-Thursday were highest during the hours of 7pm to 8pm.

Official

Current ward (as of 2022) (based on best fit to 2011 OA)	No. of LAS callouts Assault-Injury flagged Apr 2023 – Mar 2024
Balham	15
Battersea Park	41
East Putney	21
Falconbrook	73
Furzedown	27
Lavender	49
Nine Elms	50
Northcote	16
Roehampton	43
Shaftesbury & Queenstown	51
South Balham	9
Southfields	12
St Mary's	49
Thamesfield	31
Tooting Bec	26
Tooting Broadway	90
Trinity	15
Wandle	68
Wandsworth Common	79
Wandsworth Town	51
West Hill	36
West Putney	22

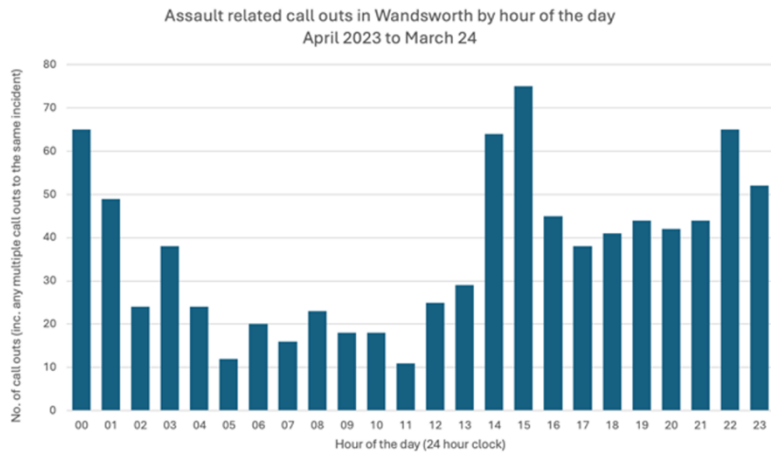


NB: Data has been filtered to include those call outs flagged as "Assault Injury" either caller or paramedic derived. "Assault Injury is a SafeStats-generated category, containing dispatches where callers and/or paramedics have described/recorded patient(s) requiring medical assistance due to the effects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

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

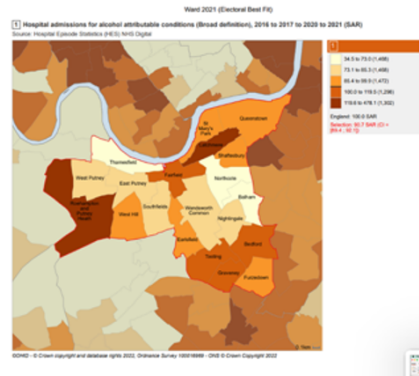
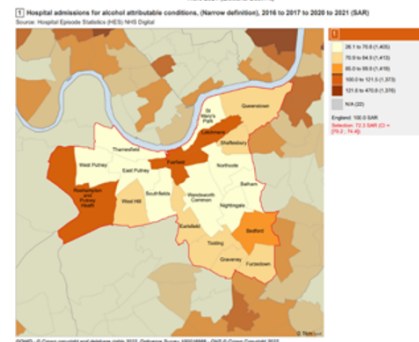
Official

Hour of the day (caller and paramedic derived)	Assault relate call outs	Proportion of assault flagged calls
00	65	7.4%
01	49	5.6%
02	24	2.7%
03	38	4.3%
04	24	2.7%
05	12	1.4%
06	20	2.3%
07	16	1.8%
08	23	2.6%
09	18	2.0%
10	18	2.0%
11	11	1.2%
12	25	2.8%
13	29	3.3%
14	64	7.3%
15	75	8.5%
16	45	5.1%
17	38	4.3%
18	41	4.6%
19	44	5.0%
20	42	4.8%
21	44	5.0%
22	65	7.4%
23	52	5.9%



The highest number of assault-injury flagged call outs over the 12-month period took place in the early afternoon with 3-4pm having the highest number of callouts, followed by 2pm-3pm. However, just over a fifth of all assault callouts on a Saturday take place between 11pm and 1am. Around 70% of all assault-injury flagged calls took place between 2pm and 1am.

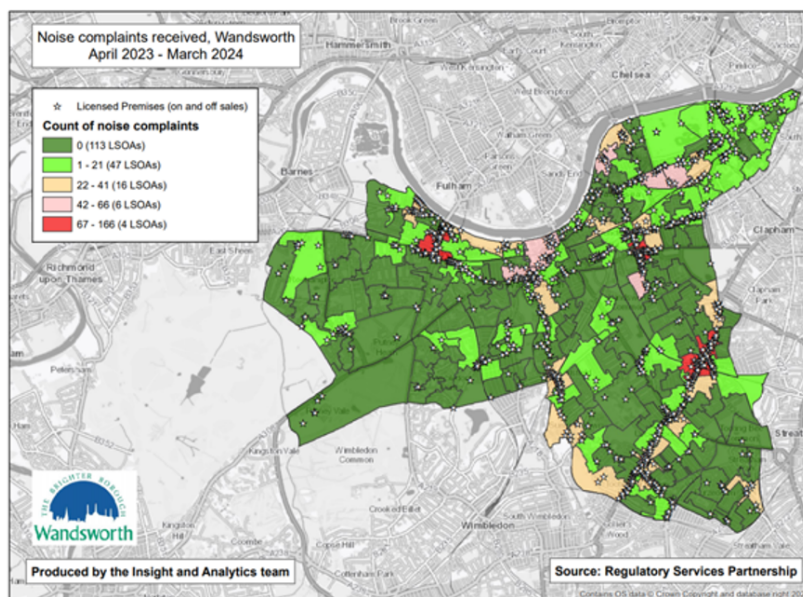
Ward (Pre 2022)	Hospital admissions for alcohol attributable conditions, (Narrow definition)	Hospital admissions for alcohol attributable conditions, (Broad definition)
Balham	59.7	68.7
Bedford	94.2	112.6
Earlsfield	76.5	91.9
East Putney	57.1	75.4
Fairfield	101.6	101.2
Furzedown	75.8	96.0
Graveney	82.4	101.2
Latchmere	108.5	135.3
Nightingale	64.1	78.8
Northcote	51.0	63.7
Queenstown	72.1	95.3
Roehampton and Putney Heath	102.1	123.7
St Mary's Park	54.7	87.9
Shaftesbury	75.9	99.0
Southfields	55.3	75.5
Thamesfield	43.1	58.8
Tooting	84.4	103.3
Wandsworth Common	54.2	74.1
West Hill	81.4	96.1
West Putney	63.9	83.6



4.11 Public Nuisance

Noise: Headline findings

Ward	No. of noise complaints Apr '23 – Mar '24
Balham	334
Battersea Park	175
East Putney	4
Falconbrook	48
Furzedown	32
Lavender	152
Nine Elms	24
Northcote	48
Roehampton	14
Shaftesbury & Queenstown	51
South Balham	66
Southfields	13
St Mary's	124
Thamesfield	233
Tooting Bec	46
Tooting Broadway	108
Trinity	3
Wandle	35
Wandsworth Common	56
Wandsworth Town	132
West Hill	2
West Putney	20



Area of interest	Reports	% of total
Balham	438	25.5%
Putney	243	14.1%
Tooting (combined)	186	10.8%
Clapham Junction	172	10.0%
Wandsworth Town	132	7.7%
Total borough reports	1,720	

4.12 Street Drinking: Headline findings

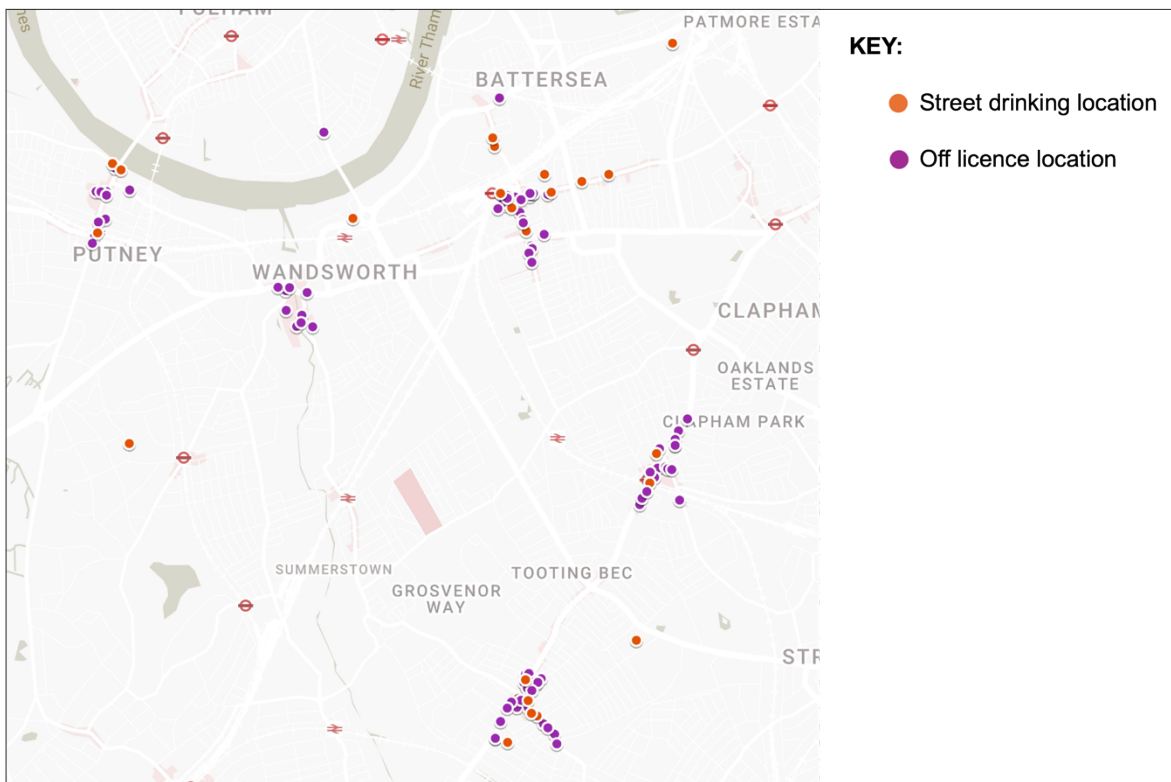
Areas	Hotspots
Clapham Junction	8
Tooting	6
Putney	4
Battersea	2
Balham	2
Lavender Hill	2
Northcote Road	1

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Southfields	1
Total Hotspots	26

- Key locations for street drinking are Clapham Junction area of interest (31% (n.8) of all hotspots), Tooting area of interest (23% (n.6) of all hotspots) and Putney area of interest (15% (n.4) of all hotspots).
- Wandsworth has very limited issues with street drinking in parks and housing estates relative to other London boroughs the researchers have studied.
- Most hotspots are on or near to clusters of off-licensed premises in high streets, rail stations and the public realm.
- Wandsworth, with 26, has less street drinking hotspots than Hounslow (113, in just five wards) and Hackney (33), but more than Camden (17) and Bromley (12).
- This is 'quantitative' not 'qualitative' data, so does not assess the impact of these street drinkers on other residents, environmental 'grime' and business trading environment.

4.12.1 Street Drinking Sites and Off Licence Locations



London Borough of Wandsworth: Cumulative Impact Research Report, 2024

4.13 Fixed Penalty Notices

4.13.1 Between 01/04/2023 and 31/03/2024, the police issued a total of 239 anti-social behaviour (ASB) notices ,16 community warning notices (CWNs) and 6 community protection notices (CPNs).

4.13.2 The Wards of Nine Elms and Lavender had the highest number of ASB notices, followed by Battersea Park, Thamesfield and Tooting Broadway.

4.13.3 The map below offers an overview of the locations.

WARD	ASB Notices	CPW	CPNs
Balham	10	0	0
Battersea Park	26	5	0
East Putney	1	0	0
Falconbrook	6	1	0
Furzedown	3	0	0
Lavender	27	0	0
Nine Elms	51	0	0
Northcote	2	0	0
Roehampton	13	3	1
Shaftesbury & Queenstown	19	1	1
South Balham	5	1	1
Southfields	2	0	0
St Mary's	4	1	0
Thamesfield	24	0	0
Tooting Bec	6	1	1
Tooting Broadway	21	1	0
Trinity	2	0	1
Wandle	2	0	0
Wandsworth Common	2	0	0
Wandsworth Town	1	1	1
West Hill	2	1	0
West Putney	10	0	0
TOTAL	239	16	6

4.14 Fieldwork Observations

4.14.1 Clapham Junction

4.14.1.1 Busy venues & street drinking: The London and South Western Pub was busy with proper door supervision, but street drinking from groups using public spaces as makeshift bars was observed.

4.14.1.2 Litter & intoxication: The area around The Falcon Pub and Clapham Junction was littered with empty bottles and cans, with groups of intoxicated young men moving between venues.

4.14.1.3 Dispersal issues: Streets near The Clapham Grand smelled of urine post-dispersal, with a lack of security staff monitoring the adjacent areas.

4.14.1.4 Safety concerns: Poor street lighting around Fitness First gym and areas nearby made them feel unsafe, with high intoxication levels and chaotic behaviour observed.

4.14.1.5 Open drug use: Open drug use was witnessed outside a pub in the area during dispersal.

4.14.1.6 Crowd control issues: Venues along Battersea Rise and Northcote Road struggled with crowd management, with groups blocking pavements and stepping into traffic.

4.14.1.7 Traffic hazards: The junction between Northcote Rd and Battersea Rise was particularly hazardous with intoxicated pedestrians walking into oncoming traffic.

4.14.1.8 Chaotic dispersal: Some venues had chaotic dispersal with people wandering into the road and unlicensed taxis picking up customers.

4.14.1.9 No visible police: There was no visible police presence or capable guardianship, contributing to a sense of unchecked behaviour.

4.14.1.10 Comparison to Old Street: Suggested that lessons could be learned from Old Street, where visible staff presence and crowd control measures at road junctions helped manage behaviour and safety.

4.14.2 Tooting Broadway

4.14.2.1 Lighting & safety concerns: Several areas, particularly near Mitcham Rd and Tooting Rail Station, were poorly lit, making them feel unsafe.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- 4.14.2.2 Well-managed venues:** The Ramble Inn, Goldfinch Wine Bar, and other venues had good management, contributing to a safe environment.
- 4.14.2.3 Rough sleeping & homelessness:** Some homelessness was observed, particularly near Tooting Library, but no aggressive behaviour was reported.
- 4.14.2.4 Mixed venue atmospheres:** Broadway Market was chaotic but popular, with concerns about lack of ID checks and a young, possibly underage, intoxicated crowd.
- 4.14.2.5 Crime & disorder:** Instances of petty crime (like phone theft) and concerns about young people interacting with suspicious older men were noted around market dispersal.
- 4.14.2.6 Dispersal chaos:** Markets saw chaotic dispersal, with intoxicated patrons, broken glass, and lack of security management at closing.
- 4.14.2.7 Late-night nuisance:** Fast food outlets and off-licences attracted intoxicated young crowds, creating nuisance and vulnerability to crime.
- 4.14.2.8 Recommendations:** Markets should enhance ID checks, security presence, dispersal policies, and cleanliness to reduce negative impact.

4.14.3 Central Balham

- 4.14.3.1 Clean & safe:** Balham felt safe, clean, and welcoming, with a calm atmosphere despite busy bars and restaurants.
- 4.14.3.2 Drinking & litter:** Some signs of outdoor drinking, but issues were minimal and isolated. Vomit was seen near Balham Station.
- 4.14.3.3 Loud venues:** Tapjax was loud but had a friendly, well-managed crowd. Exhibit Pub was well-supervised.
- 4.14.3.4 Lack of door supervisors:** Few venues had visible door staff, except for The Exhibit and The Bedford, which were well-managed.
- 4.14.3.5 Homelessness:** Homeless individuals noted near Balham Library, with no security present.
- 4.14.3.6 Crowd Demographic:** Predominantly people in their 20s and early 30s. The area seemed to self-regulate with little trouble.

4.14.4 Putney

- 4.14.4.1 Lively evening start:** Putney was lively with mixed generational groups, friendly atmosphere, clean and well-lit streets, though some bins were overfilled.
- 4.14.4.2 Street drinking & homelessness:** Minor signs of street drinking in Church Square, and homeless individuals noted near Putney Station. However, the situation improved later in the night.
- 4.14.4.3 Quiet venues:** Several venues like The Rocket, Boathouse, and Upper Richmond Road restaurants were quiet, though East Putney Tavern was busy and well-managed.
- 4.14.4.4 Well-managed bars:** Simmons Bar, Be At One, and The Fez were well-managed with visible security, and no issues at dispersal. The Fez's smoking area slightly obstructed pavement access.
- 4.14.4.5 Police incident:** One venue had a police presence due to a male being arrested and a female requiring medical attention. This was the only notable disturbance.
- 4.14.4.6 Crowd & atmosphere:** Younger crowds gathered at the lower part of Putney High Street, while the Upper Richmond Road area attracted an older crowd and was quieter.
- 4.14.4.7 Safe environment:** Overall, Putney felt safe, with signs of drunkenness but nothing alarming. Public transport, including night buses, was reliable.

4c Stakeholder Consultation

4.15.1 Engagement: Headline findings

- 4.15.1.1** Engagement with ward members, police, community safety teams, rough sleeping services, and public health stakeholders provided qualitative and anecdotal insights into the challenges posed by the borough's licensed economy and its impact on local resources. Nine of the borough's 58 ward councillors contributed information and anecdotal evidence based on constituent feedback, which was considered in this research.
- 4.15.1.2** The number of off-licences borough-wide was identified as problematic, with Tooting facing particularly acute challenges related to their proliferation.

4.15.2 Hierarchy of Challenges from the Met Police:

4.15.2.1 Primary Challenge: Tooting Broadway

Tooting Broadway was highlighted as the primary area of concern for the police, particularly for its impact on resources. Key issues include alcohol-related violence, sexual offences, theft from vulnerable individuals, and aggressive begging. These incidents are most prevalent during the late-night hours between 22:00 hours and 02:00 hours on Fridays and Saturdays. Additional problems arise around late-night food premises operating after 23:00 hours. Overall, this area represents the greatest demand on police resources during the weekend.

4.15.2.2 Secondary Challenge: Clapham Junction Area

Clapham Junction, excluding Lavender Hill, was identified as the second most significant challenge. Issues are linked to the expansion of the night-time economy, the area's large transient population, and incidents of alcohol-related violence against individuals. These problems occur "around the clock, most days," contributing to persistent pressure on local resources.

4.15.2.3 Tertiary Challenges

Balham, Tooting Bec, Putney High Street, Northcote Road, and Wandsworth Town were flagged as additional areas of concern, though at a lower level than Tooting Broadway and Clapham Junction.

4.15.2.4 Low-Priority Areas

Lavender Hill and Battersea were noted as areas of low priority in relation to the challenges of the licensed economy.

4.15.3 Specific Issues by Location

- Tooting Broadway and Putney Station: Aggressive begging is a recurring concern, particularly in these areas.
- Putney (all areas): Rough sleeping, often linked to begging and the presence of off-licences, contributes to ongoing challenges.
- Tooting: The concentration of off-licences facilitates 'pre-loading' and 'side-loading' behaviours, exacerbating issues around alcohol-related crime and antisocial behaviour. Late-night food premises are an additional factor post-23:00 hours.
- Northcote Road: The dispersal of patrons from the cluster of licensed premises poses challenges.

4.15.4 Police Support for Cumulative Impact Assessments

4.15.4.1 The police support the introduction of cumulative impact assessments (CIAs) to help mitigate pressures on local resources. Tooting Broadway was identified as

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

the primary location where a CIA would be most effective, followed by Clapham Junction as a secondary priority. While CIAs for tertiary locations could also provide benefits, these were considered a lower priority.

4.15.5 Primary Concerns for Putney Members:

4.15.5.1 Putney High St. Members report concerns about assault, noise, intoxication and vandalism, particularly after venues close. There are concerns around overcrowding, unpredictable behaviour, noise, litter and road safety.

4.15.5.2 The number of late-night food venues is a particular concern, together with nightclubs and pubs. Police report aggressive begging, off licences and rough sleeping is an issue around Putney Station (also seen on observations).

4.16 Conclusions

4.16.1 The research section of this report has identified patterns of cumulative impact in the London Borough of Wandsworth, focusing on the relationship between the density of licensed premises, crime, antisocial behaviour (ASB) and public nuisance. Key conclusions are as follows:

4.16.2 Areas of Concern:

- **Tooting Broadway** and **Clapham Junction** emerged as the primary areas experiencing impact due to a high density of licensed premises, crime and antisocial behaviour.
- **Tooting Broadway** faces acute challenges with alcohol-related violence, theft and public nuisance during late-night hours, exacerbated by a concentration of off-licences and late-night refreshment premises.
- **Clapham Junction** experiences high volumes of ASB, particularly rowdy behaviour and public intoxication, with dispersal issues contributing to further nuisance and safety concerns.

4.16.3 Crime and ASB Density:

- Clapham Junction recorded the **highest incident density** (771 incidents/km²), followed by Tooting Broadway (590/km²). These densities are well above the borough average (145/km²), highlighting the disproportionate impact in these areas.
- Crime hotspots included violent offences, theft, public order incidents and drug-related offences, particularly near key transport hubs and nightlife clusters.

4.16.4 Public Nuisance:

- Noise and littering were significant issues across town centres, particularly in **Tooting Broadway, Putney** and **Clapham Junction**.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- Poor street lighting and inadequate public toilet provision exacerbated safety concerns, particularly for women and vulnerable groups.

4.16.5 Street Drinking:

- Street drinking hotspots were identified across the borough, concentrated near off-licensed premises, particularly in areas such as Clapham Junction and Tooting Broadway. These hotspots were linked to visible litter, rough sleeping and associated ASB.

4.16.6 Ambulance Callouts:

- **Tooting Broadway** area of interest had the highest volume of alcohol-related ambulance callouts, followed by **Putney** and then **Clapham Junction** areas of interest.

4.16.7 Stakeholder Insights:

- Police, public health and community safety stakeholders highlighted **Tooting Broadway** as the most resource-intensive area, followed by **Clapham Junction**.
- Aggressive begging, alcohol-related violence and post-23:00 hours dispersal from venues and takeaways were cited as key challenges.
- Issues in **Putney** were highlighted by several Ward Councillors in the area. Issues highlighted include overcrowding, unpredictable behaviour, noise, litter and road safety, with specific concerns around the number of late night refreshment premises, nightclubs and pubs in the area.

4.16.8 Field Observations:

- On-site audits revealed issues of intoxicated behaviour, littering and poor dispersal management in town centres.
- Well-managed venues demonstrated that effective security and dispersal policies can mitigate cumulative impact.

5. Alternative/Complementary Approaches to a CIA**5.1 (a) Statement of Licensing Policy considerations****5.1.1. Flexibility to deal with new and urgent issues**

Add a statement to the SoLP confirming that the council will not only keep the SoLP under review but may also issue additional policies or guidance on specific issues as they arise. This approach allows flexibility to address urgent matters, such as drink spiking, without the need for a full review of the SoLP. While these documents would sit outside the SoLP, the council can share them with licensees and outline its expectations for compliance in support of the licensing objectives.

5.2 Licence application database and new application emails

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

5.3 Tailored guide hours

If the council wishes to retain guide hours, it might consider developing a more evidence-based core hours policy based on geographical area and licence type, in consultation with residents, businesses, and other relevant stakeholders. [Westminster City Council](#) reviewed its core hours policy framework in 2020 to align with the type of premises use. Wandsworth Council could adopt a similar approach, incorporating more nuanced spatial boundaries to reflect the character of different neighbourhoods.

5.4 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.

5.5 It is possible to consider cumulative impact without a CIA

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, regardless of whether a CIA is published. 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*). Unlike a CIA, which must only consider cumulative impacts from sources within the borough of Wandsworth, evidence of cumulative impact in a representation could be included from across the border into another borough.

5.6 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.

5.7 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 Business Improvement District (BID) support for the NTE, policing plans, noise mitigation, operational management plans/dispersal plans, etc.

5.8. 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 Wandsworth (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.

5b General considerations

5.9 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.

5.10 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.

5.11 Planning service support of granted applications

Wandsworth'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.

5.12 Cross-borough collaboration

Consider how the London Borough of Wandsworth could work with neighbouring boroughs for example Lambeth 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.

5.13 Toilet provision

As is not unusual in current times, public toilet provision at night in the London Borough of Wandsworth 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 Wandsworth 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.

5.14 Cleansing

A review of the cleansing regime after dark in Tooting would be a positive step. Other town centres in the borough, e.g. Balham, Clapham Junction / Lavender Hill and, particularly Putney, are generally much cleaner in the evening than Tooting. It is important that Tooting has the same excellent standards of public services and infrastructure that the other town centres receive. Bristol has created a [Clean Streets Strategy](#), working with residents, community groups, businesses and other stakeholders supported by targeted enforcement action that could be a useful way of addressing Tooting's issues. .

5.15 Lighting

There are a number of areas within nearly all of the town centres where lighting council be improved. This would aid the licensing objective of public safety (particularly of women and girls) and would discourage public urination and predatory crime. Tooting is in particular need of attention, as the field observations showed that there were both street and TfL Highways lighting that were out, creating an intimidating walk between different parts of the town.

5.16 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.

5c. Alternative approaches to managing issues

5.17 Fostering partnerships

Taking a partnership approach to addressing issues was supported by many interviewees, which is also generally considered best practice.

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 partnerships that have responsibility for managing relationships with hospitality locally.

5.18 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 Wandsworth have a BID in place, so these could be developed in areas where they do not exist currently and create a strong night-time programme of business support and interventions. The BIDs in the London Borough of Wandsworth are currently: Putney, Wandsworth Town and Clapham Junction.

5.19 Capable guardians

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

5.20 Safe Space/Street volunteers

Putney has Street Angels operating on a Friday night, but would like to expand to Saturday, too. Tooting could benefit from a 'safe space'. Benefits of safe spaces include safety and support for patrons of the NTE, supporting the Violence Against Women and Girls agenda, reducing the strain on blue light services, and allowing door staff to focus their job. If introduced, Wandsworth should consider how to make this sustainable in the long term, e.g., by making the financial case to the local NHS Trust, GLA and BID. The [SOS Bus in Colchester](#) has been successful in securing financial support for a number of years from the local NHS Trust.

5.21 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](#)

5.22 Vulnerability training

Continue to 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 Wandsworth.

5.23 Pubwatch

Where a licensed business forum does not exist in an area with clustering of premises, a [Pubwatch](#) could be set up to empower licensees to work together to address issues. These forums 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.

5.24 Purple Flag

Consider seeking [Purple Flag](#) accreditation, initially for Putney. 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

5.25 Night time Champion

Introduce a night-time champion/representative to both champion the Wandsworth hospitality sector 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

5.26 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.

5.27 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.

5.28 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-licences. 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.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

- 5.29 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.
- 5.30 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.
- 5.31 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.
- 5.32 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.
- 5.33 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.
- 5.34 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.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

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

5.35 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.

5.36 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.

37. Regular, location-specific communication

Regular email communications/newsletters 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.

5.38 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.

Data considerations

5.39 Noise data

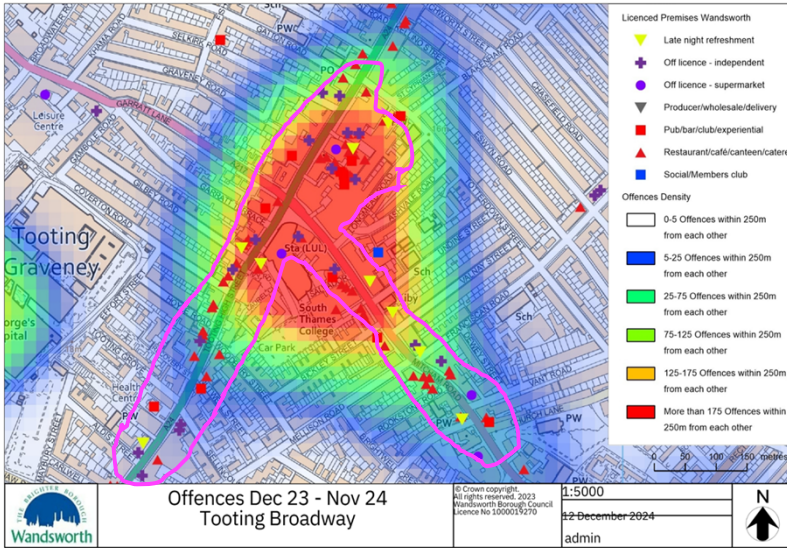
Revisit the council’s noise recording practices and processes to allow more specific data to be collected about where noise is happening, what the sources are and thus support more granular future analysis. At the moment, for example, it is not possible to understand where on-street noise is a significant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

6. Recommendations

- 6.1 Having reviewed the information contained in this report and taking into consideration the relevant principles, it is recommended that on balance, there is sufficient compelling evidence to justify the publication of Cumulative Impact Policy to promote any of the licensing objectives in some parts of the borough of Wandsworth.
- 6.2 Tooting Broadway was highlighted as the primary area of concern for the police, particularly for its impact on resources. Key issues include alcohol-related violence, sexual offences, theft from vulnerable individuals, and aggressive begging. It had the highest volume of alcohol related ambulance callouts. Additionally, the number of off-licences borough-wide was identified as problematic, with Tooting facing particularly acute challenges related to their proliferation.
- 6.3 Putney had a high volume of alcohol related ambulance callouts and reported concerns on assault, noise and vandalism.
- 6.4 Whilst Clapham junction is highlighted as having the highest number of criminal and anti-social behaviour (ASB) offences, as well as the highest concentration of licensed premises, it is recognised as a major transport hub in the borough connecting to other destinations. Therefore, some incidents may not be directly linked to 'on' licensed premises or late-night refreshments venues. However, it is acknowledged that high levels of streets drinking in the area may be associated with nearby 'off' licences.
- 6.5 The Licensing Committee is asked to consider introducing a cumulative impact assessment in the following areas of the Borough:
- **Tooting Broadway area** - Sale of alcohol for consumption 'off' the premises only ('Off' licence)
 - **Clapham Junction area** - Sale of alcohol for consumption 'off' the premises only ('Off' licence) in the following locations:
 - **Putney High Street area** – Premises providing Late Night Refreshments only (The sale of hot food and drinks only between 23:00 hours and 05:00 hours).
- 6.6 If approved, the Licensing Authority will carry out a twelve week (three months) public consultation on the proposed Cumulative Impact Assessment.

Appendix A

Tooting Broadway



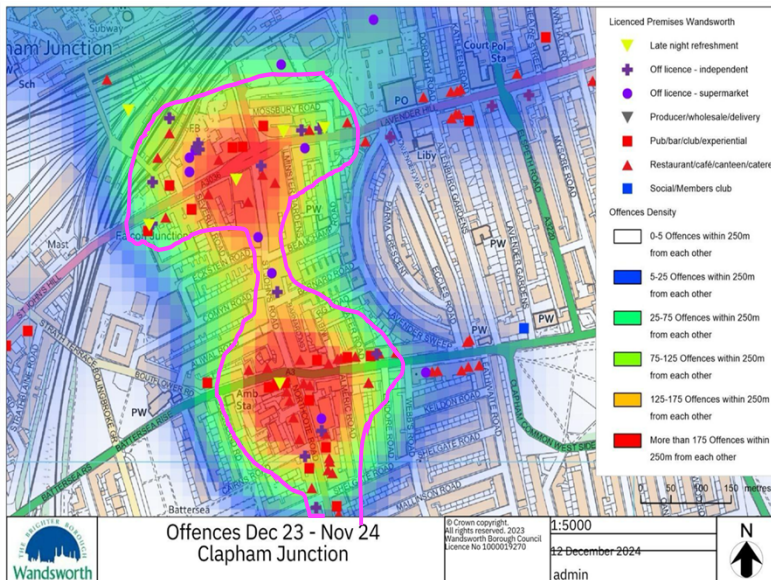
The pink line indicates the rough outline of suggested CIA.

It includes:

- Tooting High Street south end from the crossroads with Blackshaw Road and Longley Road, to the north end at the crossroads with Moffat Road and Kellino Street.
- All of Tooting Broadway market
- Mitcham Road from the very north end down to just south of Church Lane (near Iceland).

Please note, exact area to be decided by Licensing Committee then drawn up professionally by GIS Team.

Clapham Junction



The pink line indicates the rough outline of suggested CIA.

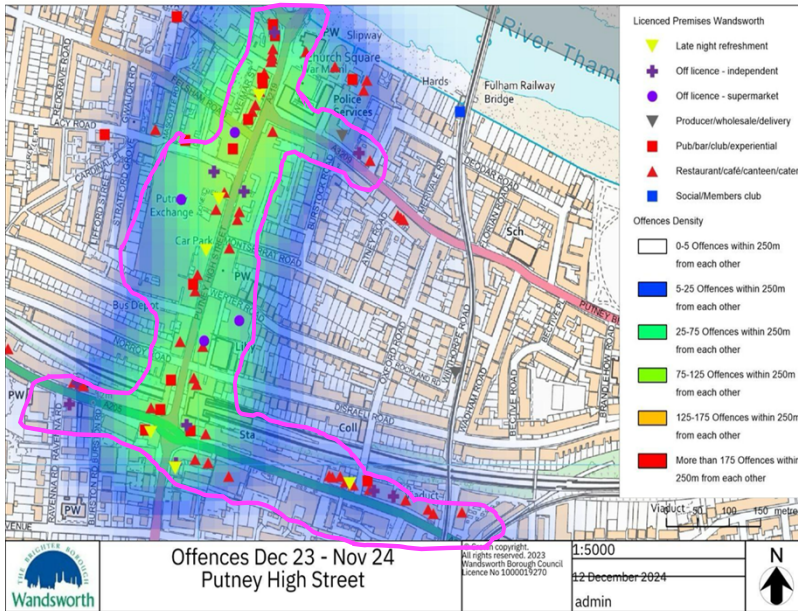
It includes:

- South section of Falcon Road
- East section of St John's Hill
- West section of Lavender Hill
- St John's Road
- A section of Battersea Rise
- North section of Northcote Road
- Battersea Rise, east and west of where it intersects with St John's Road/Northcote Road

Please note, exact area to be decided by Licensing Committee then drawn up professionally by GIS Team.

London Borough of Wandsworth: Cumulative Impact Research Report, 2024

Putney



The pink line indicates the rough outline of suggested CIA.

It includes:

- Putney High Street from Putney Bridge at the north end to just over Upper Richmond Road (South Circular) junction, including Putney Exchange.
- A short section of the west end of Putney Bridge Road.
- Part of Upper Richmond Road (South Circular), from close to Putney Arts Centre to the west to near Putney East station to the east.

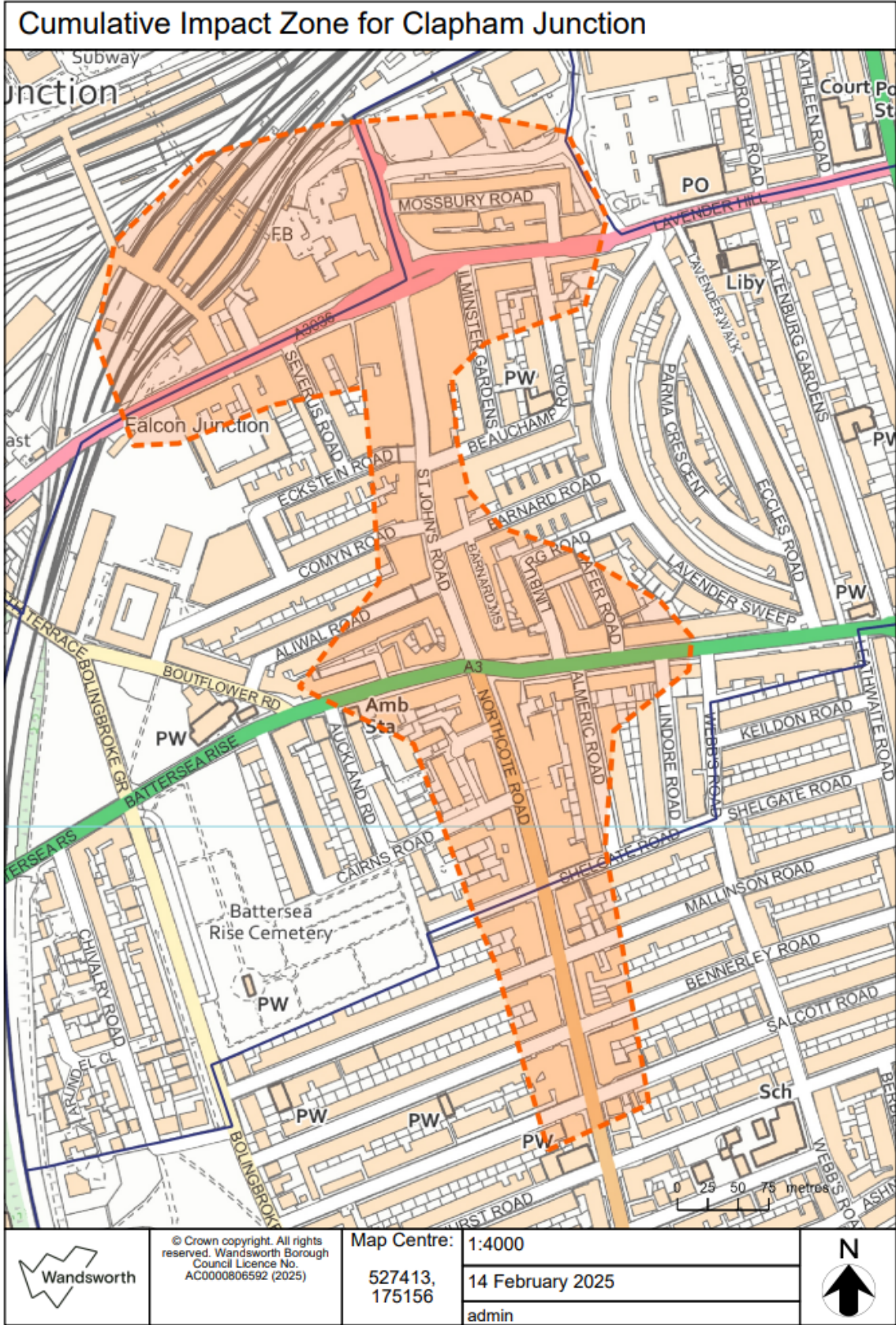
Please note, exact area to be decided by Licensing Committee then drawn up professionally by GIS Team.

Appendix B



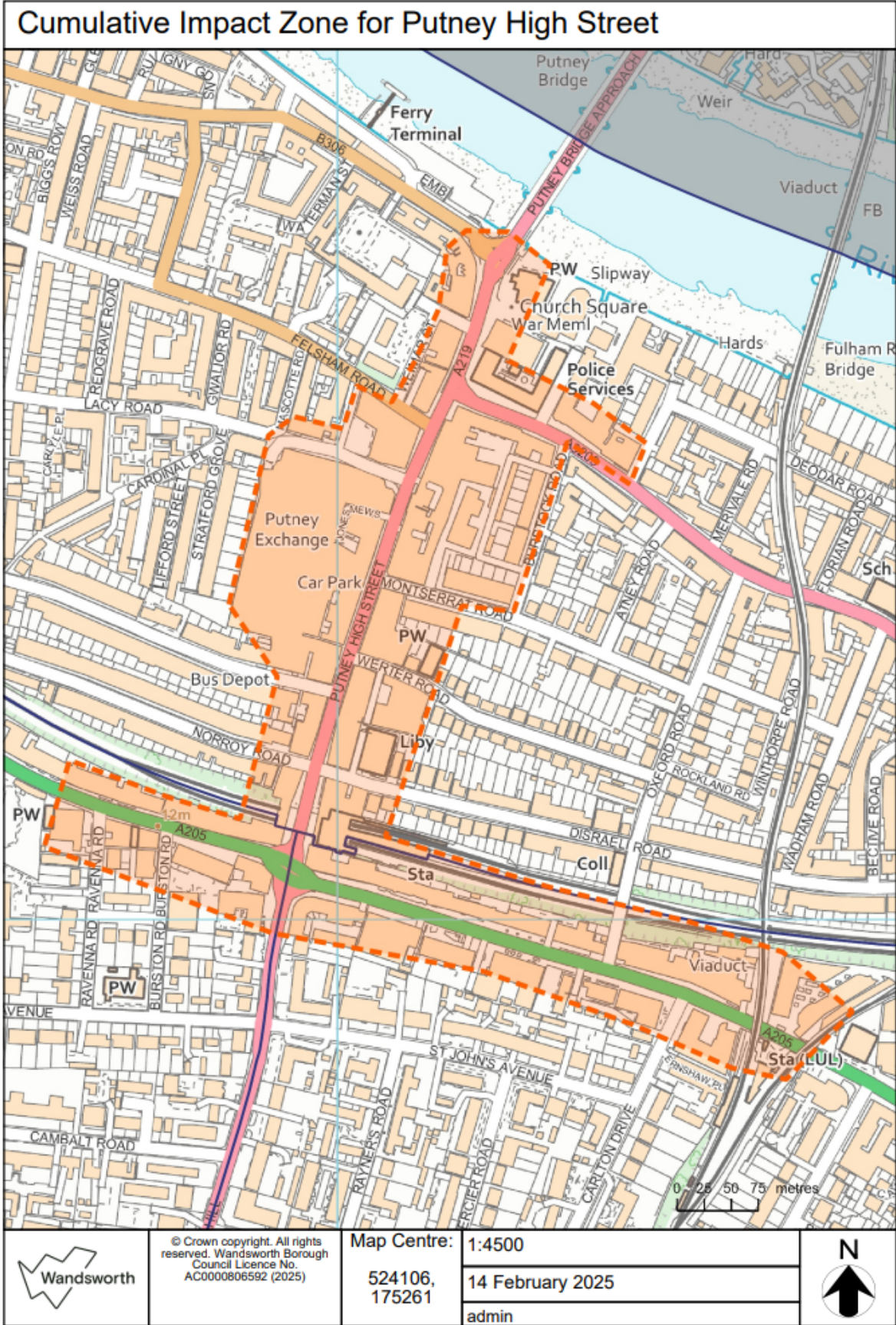
Tooting Broadway Cumulative Impact Zone

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



Clapham Junction Cumulative Impact Zone

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



Putney High Street Cumulative Impact Zone

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