

Meeting: Full Council

Date: 6th March 2024

Wards: All

Subject: Three yearly review of the Council's Cumulative Impact Assessment as required under the Licensing Act 2003

Lead officer: Dan Jones, Executive Director of Environment, Civic Pride and Climate

Lead member: Councillor Edith Macauley, Chair of the Licensing Committee

Forward Plan reference number: N/A

Contact Officer: Caroline Sharkey, Licensing Manager, London Boroughs of Merton, Richmond upon Thames and Wandsworth Joint Regulatory Services Partnership and Guy Bishop Senior Lawyer Litigation and Planning Team.

Recommendations:

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- A. To adopt the Council's Cumulative Impact Assessment 2024-2027 as required under Section 5 of the Licensing Act 2003, as approved by Members of the Licensing Committee on 22nd February 2024. October 2020.
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1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 Section 141 of the Policing and Crime Act 2017 came into force on 6 April 2018 and gave cumulative impact assessments (CIAs) a statutory basis in the Licensing Act 2003. The Act sets out what a licensing authority must do in order to introduce a Cumulative Impact Policy, 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. A Cumulative Impact Assessment must be included as part of the Authority's Licensing Policy.

2. DETAILS

2.1 Consultation

The Licensing Authority is required to consult on its proposed CIA 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.
- 2.2 Their views must be given appropriate weight when the Cumulative Impact Policy is determined. Subject to the statutory requirements; it is for each Licensing Authority to determine the extent of the consultation having regard to the cost and time.
- 2.3 At the Licensing Committee meeting of [17th October 2023](#), the Committee considered the available evidence of cumulative impact in the Borough. The Committee approved for consultation a general indication of the parts of the Borough where it believes that the number or density of licensed premises is having a cumulative impact leading to problems which are undermining the licensing objectives. The Cumulative Impact Analysis produced **at Appendix B** included the reasons for this belief and whether the special policy would relate to all premises licences and club premises certificates or only to those of a particular kind. The Committee also approved a list of conditional exceptions to the Cumulative Impact Assessment for both Wimbledon Town Centre and Mitcham Town Centre, produced **at Appendix A**.
- 2.4 The public consultation of the Cumulative Impact Analysis took place between 23rd October 2023 and 15th January 2024. The consultation that was carried out included directly contacting Responsible Authorities, solicitors who regularly represent licensees in the Borough, trade associations, Ward Councillors residents' associations and other stakeholders who receive email notification of applications received by the Licensing Authority. In addition, electronic copies of the consultation documents were published on the Council's website. The consultation was also publicised in the e-newsletter and on social media by the Council. The consultation responses are produced **at Appendix C**.

Cumulative Impact Policy (CIP) and Assessments

- 2.5 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 badly managed premises. It is instead the combined effect of multiple premises in close proximity, and the overall numbers of customers being attracted to an area. Initially there was no statutory basis for a Council to introduce a cumulative impact policy, instead relying on 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 particular 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.

- 2.6 Under the amendments to the Licensing Act 2003 ("the 2003 Act"), Cumulative Impact Assessments ("CIA") were given a statutory basis, and the Government believed that this would assist transparency in decision making. Under the 2003 Act, therefore, a licensing authority can publish a CIA to help limit the number or types of licence applications granted where there is evidence showing that the number or density of premises in an area is having a cumulative impact and leading to problems which are undermining the licensing objectives. The 2003 Act sets out what a licensing authority needs to do to publish a CIA. This includes consulting with residents and businesses in the borough and reviewing the Assessment every three years to ensure that it is current and remains rooted in strong evidence.
- 2.7 The 2003 Act requires that when determining or revising its Statement of Licensing Policy, the Licensing Authority must have regard to any CIA it has published. The Statement of Licensing Policy must summarise any CIA that has been published, and explain how the Licensing Authority has had regard to the CIA. This is incorporated into the Statement of Licensing Policy as the Cumulative Impact Policy ("CIP"), which is often referred to as a Special Policy.
- 2.8 The Cumulative Impact Policy, in conjunction with publishing a 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.
- 2.9 A cumulative impact assessment must set out the evidence for the authority's opinion. The evidential basis must show that there is a link between the issues of concern in an area and the concentration of a number of licensed premises or licensable activities in that area.
- 2.10 Cumulative Impact Assessments 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. An Authority must consult on its assessment and must review it every three years as stated above. 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.

- 2.11 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
- 2.12 Each licence application must be considered on its own merits; however, it is recognised that in some areas the cumulative effects of multiple premises in a specific area or locality may have the potential to undermine one or more of the licensing objectives. Where this is the case, the council may introduce a cumulative impact policy.
- 2.13 The cumulative impact policy 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.
- 2.14 At the Licensing Committee meeting on 17th October 2023, the Committee reviewed the evidence regarding the number of licensed premises and the impact such premises were having on crime and disorder, nuisance and health (through ambulance call out figures) across the borough. It also reviewed the responses to the 2021 residents' survey which explored resident perceptions of their local area and council services. The Committee approved for consultation a general indication of the parts of the borough where it believed that the number or density of licensed premises was having a cumulative impact leading to documented problems which were undermining the licensing objectives. The Cumulative Impact Analysis included the reasons for this belief and whether the policy would relate to all premises licences and club premises certificates or only to those of a particular kind. The consultation revolved around the proposal that:
- There is sufficient evidence was available to support the retention of two of the existing cumulative impact areas, Wimbledon Town Centre and Mitcham Town Centre.
 - It is not appropriate at this time to include any other area of the borough in the Cumulative Impact Assessment.

3.0 Responses received to consultation on Cumulative Impact Assessment

Wimbledon Town Centre CIA, consultation response

- 3.1 72 people responded to the on-line consultation. Of these, 86% agreed or strongly agreed that there should be a special policy on cumulative impact in respect of Wimbledon Town Centre (a total of 62 people). 1 person disagreed with the policy and 13% indicated that they had no view on whether there should be a special policy in Wimbledon Town (9 people). In response to the question 'to what extent do you agree to the list of exceptions to the special policy on Wimbledon Town Centre cumulative impact?' 47% disagreed or strongly disagreed with the proposed list of exceptions (34 people recorded a view), 35% agreed or strongly agreed with the exceptions list (25 people in total) and 18% indicated that they had no view on whether the list of exceptions should be included (13 people).
- 3.2 The Public Health Team supports the continuation of the special policy on cumulative impact in Wimbledon Town Centre on the basis of the density of premises and crime data presented in the cumulative impact analysis. Public Health Team stated that controlling the supply of alcohol and ensuring that the supply of alcohol is conducted in a way which reduces any negative outcomes are important ways in which to reduce the overall burden of alcohol related harm on the local population. Public Health Team also supports the exceptions listed in the special policy.
- 3.3 The Metropolitan Police are in support that the Cumulative Impact Policy in Wimbledon Town Centre should continue due to the reasons demonstrated in the CIA report. The Town Centre remains one of the busiest areas in the Borough and the Metropolitan Police Service identifies that London Borough of Merton are taking steps to attract businesses that would benefit from the special exceptions in the policy.
- 3.4 The Environmental Health (Noise & Nuisance) service have reported that they have seen an increase in noise complaints in the two cumulative impact zones (Wimbledon Town Centre and Mitcham Town Centre) from licenced premises over the previous years and based on this evidence they see no reason not to retain the existing cumulative impact zones.
- 3.5 Safer Merton Anti-Social Behaviour Team believe that the cumulative Impact Zone in Wimbledon Town Centre has been managed effectively and with the help of other external key partners.
- 3.6 Merton Conservative Group raised concerns that from the datasets produced in the CIA analysis, that it was clear that the current arrangements are not working to protect residents from the adverse effects on alcohol consumption, primarily in South Wimbledon and Mitcham. The data produced by the Anti-Social Behaviour Team also indicates that the worse affected wards are in South Wimbledon, Colliers Wood and Mitcham. The data presented on these different types of alcohol driven anti-social behaviour has been reflected in

the 2021 residents' survey. Merton Conservative Group has requested that the Council takes stronger action that it has to date. Instead of offering exceptions to the Cumulative Impact Policy in Wimbledon, the council must come up with new strategies to keep Wimbledon and Mitcham residents safe and protect the public from the adverse effects of alcohol consumption.

- 3.7 The majority of those that responded to the consultation were broadly in agreement that the special policy on cumulative impact should continue in Wimbledon Town Centre. However, 47% disagreed with the exceptions listed for the special policy.
- 3.8 A copy of the responses received were provided to the Licensing Committee.
- 3.9 At the Licensing Committee meetings on [28th June](#) and [17th October 2023](#), members acknowledged the significant impact of COVID on the high street and nighttime economy. For these reasons, members approved to expand the conditional list of exceptions to Wimbledon Town Centre cumulative impact policy were a new/existing business model demonstrated in their application that their proposed operating schedule would not have an adverse impact on the licensing objectives. Members also noted that a cumulative impact policy to refuse an application can only be invoked if the Licensing Authority receives a relevant representation under the Licensing Act 2003. Each application referred to the Licensing Sub Committee would still be considered on its own merits and on a case-by-case basis, and the Licensing Authority is still empowered to revoke a licence, refuse any application or restrict hours to earlier times if it is appropriate to do so when determining a contested application, with the view to promote the licensing objectives.
- 3.10 The existing CIA for Wimbledon Town Centre provides the below conditional exceptions:
- 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
- 3.11 Wimbledon Town Centre is a vibrant part of the borough with a diverse entertainment offering. Not all types of licensed premises will negatively impact on the area and the existing policy addresses this. The Committee may wish to acknowledge this and expand on the following wording to the Policy with a new list of conditional exceptions:
- 3.12 The Licensing Authority recognises that it must balance the needs of business with those of local residents. However, currently the number and type of premises are impacting negatively on the licensing objectives. In adopting the special policy, the authority is setting down a strong statement of approach to considering applications for the grant or variation of premises licences and club premises certificates in the Wimbledon Town Centre CIA. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics. For example,

whilst large nightclubs or late-night bars and public houses might add to the problems of cumulative impact, a small restaurant or theatre may not. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

- 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.
- 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

3.13 Examples of factors we 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

- 3.14 Having considered the evidence from the Cumulative Impact Analysis and the responses to the public consultation, the Licensing Committee decided that the special policy on cumulative impact should be retained for Wimbledon Town Centre with the additions to the list of conditional exceptions.

Mitcham Town Centre CIA, consultation responses

- 3.15 66 people responded to the on-line consultation. However, 11% disagreed or strongly disagreed with the CIA (7 people) and 29% indicated that they had no view on whether there should be a CIA in Mitcham Town Centre (19 people). Of those that recorded a view (a total of 40 people), 60% were in favour of a special policy on Cumulative Impact relating to 'off' sales of alcohol in Mitcham Town Centre. In response to the question 'to what extent do you agree or disagree to the list of exceptions to the special policy on cumulative impact in Mitcham Town Centre?' 33% disagreed or strongly disagreed with the proposed list of exceptions (22 people recorded a view), 32% agreed or strongly agreed with the exceptions list (21 people in total) and 55% indicated that they had no view on whether the list of exceptions should be included (23 people).
- 3.16 In response to the question 'to what extent do you agree or disagree that the Mitcham Town Centre cumulative impact zone should be extended to other licence types?' 44% of those who had a recorded a view felt that it should be extended (a total of 28 people recorded a view), 14% disagreed or strongly disagreed (10 people in total) and 64% indicated that they had no view on whether to extend CIZ to other types of licences (59 people). 1 response stated that the Cumulative Impact Zone should only cover different licence types that enhance the overall area. Alcohol-related licences will generally lead to anti-social behaviour.
- 3.17 The Director of Public Health supports the continuation of the special policy on cumulative impact in Mitcham Town Centre, which is restricted to off-premises sales, based on data presented in the Merton Cumulative Impact Analysis. However, Public Health Team have also stated that consideration should be given to extending the Cumulative Impact Zone (CIZ) to cover on-licensed premises. This would align the CIZ with the Wimbledon CIZ and will ensure the Council can prevent any escalation in problems caused by an increase in sales from on-licensed premises. .
- 3.18 The Metropolitan Police are in support that the CIA remains in place in Mitcham Town Centre due to the reasons demonstrated in the report. The town centre still experiences high levels of street drinking causing ASB in Merton Borough. The Metropolitan Police Service identifies that Merton Council is taking steps to attract businesses that would benefit from the special exceptions in the policy and could be beneficial to the local area and residents in return.
- 3.19 Safer Merton Anti-Social Behaviour Team stated that the cumulative impact zone in Mitcham is working effectively and with the help of other partnership schemes within the area, we are seeing a massive drop in Alcohol related Anti-social behaviour.

3.20 The majority of those that responded to the consultation were broadly in agreement that the special policy on cumulative impact should continue. Although a number of respondents indicated that the policy should be widened to include all licenced premises there is no clear evidence given to support such a move. The current Cumulative Impact Assessment for Mitcham Town Centre only applies to premises licence applications for 'off' sales of alcohol and does not contain any exceptions to the policy. The policy works effectively well in conjunction with other multi-agency partnership schemes within the area to prevent anti-social behaviour and street drinking. Safer Merton Anti-Social Behaviour Team have commented that they are seeing a massive drop in Alcohol related Anti-social behaviour in Mitcham Town Centre. A copy of all the responses received were provided to the Licensing Committee.

3.21 The Licensing Authority is aware that not all types of licensed premises will negatively impact on the area and the existing policy addresses this. For example, alcohol ancillary to the main business activity e.g. florist providing champagne with flowers or cheese shop selling wine to accompany cheese. The Committee may wish to acknowledge this and expand on the following wording to the Policy with a new list of conditional exceptions:

3.22 The Licensing Authority recognises that it must balance the needs of business with those of local residents. However, currently the number and type of premises are impacting negatively on the licensing objectives. In adopting the special policy, the authority is setting down a strong statement of approach to considering applications for "off" sales of alcohol for the grant or variation of premises licences and club premises certificates in the Mitcham Town Centre. However, the Authority recognises that the impact of premises can be different for premises with different styles and characteristics of their business model. For this reason, applications with comprehensive operating schedules that meet the following criteria may be able to demonstrate that there will be no negative cumulative impact on one or more of the licensing objectives:

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

i. Specialist premises selling alcohol ancillary to main activity of business e.g., florist providing champagne with flowers, cheese shop selling wine to accompany cheese.

ii. Premises that can demonstrate that the risk of alcohol purchased from the premises being consumed on the street is minimal due to the nature and type of alcohol being sold, which could include the following:

I. conditions restricting the sale of high strength alcohol, single cans and miniatures.

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. I

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.

3.23 Examples of factors we 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

3.24 Having considered the evidence from the Cumulative Impact Analysis and the responses to the public consultation, the Licensing Committee decided that the special policy on cumulative impact should be retained for Mitcham Town Centre relating to off-sales only. The Licensing Committee also approved a new list of conditional exceptions the special policy.

4.0 Introducing a special policy on cumulative impact elsewhere in the borough-consultation responses

4.1 9 people responded to the online consultation in relation to considering cumulative impact in other areas of the borough. Below is a summary of responses received:

- There is no need for more cumulative impact zones elsewhere in the borough (1 response).
- There seems to be a development of many similar retail types in Morden and given the terminus of the northern line, there may be a missed opportunity without a good CIA (1 response).
- 1 response suggested to consider Raynes park but there was no explanation for this.
- Wimbledon Village to be considered because of too many hospitality venues and occasional anti-social behaviour, but especially during Wimbledon tennis fortnight and major football tournaments (2 responses)
- Safer Mertons Anti-Social Behaviour Team believe that Morden Town Centre could benefit from cumulative impact zone because of the sudden increase in rough sleepers and street drinkers in the area.
- Public Health Team stated that they have not recently conducted a review of the spread of alcohol related harms across Merton
- Merton Conservative supports the immediate adoption of measures to tackle anti-social behaviour in other local centres of the borough such as Wimbledon Village, Colliers Wood, Morden and Raynes Park if evidence emerges to support such measures, or local residents demand them due to increases in incidents of anti-social behaviour.

4.2 A copy of all the on-line responses received were provided to the Licensing Committee.

5.0 DECISION

- 5.1 Members of the Licensing Committee decided to approve the draft Cumulative Impact Assessment attached at Appendix A with a recommendation for adoption by full Council.

6.0 ALTERNATIVE OPTIONS

- 6.1 None for the purposes of this report.

7.0 CONSULTATION UNDERTAKEN OR PROPOSED

- 7.1 A twelve week (three month) public consultation was undertaken on the proposed Cumulative Impact Analysis.

8.0 Timetable

- 8.1 Following adoption by full Council the Cumulative Impact Assessment 2024-2027 will be published on the Council's website and will take effect from 7th March 2024.

9.0 FINANCIAL, RESOURCE AND PROPERTY IMPLICATIONS

- 9.1 None for the purposes of this report.

10.0 LEGAL AND STATUTORY IMPLICATIONS

- 10.1 As set out the report, Section 141 of the Policing and Crime Act 2017 amended section 5 of the Licensing Act 2003 placing the requirement of a cumulative impact assessment ("CIA") on a statutory footing, instead of the adoption of Cumulative Impact Zones and Policies, as part of the licensing authority's Statement of Licensing Policy.

- 10.2 Section 5A(1) of the Licensing Act 2003 (as amended) states:

"A licensing authority may publish a document ("a cumulative impact assessment" stating that the licensing authority considers that the number of relevant authorisations in respect of premises in one or more parts of its area described in the assessment is such that it is likely that it would be inconsistent with the authority's duty under section 4(1) to grant any further relevant authorisations in respect of premises in that part or those parts."

- 10.3 A cumulative impact assessment must set out the evidence for the authority's opinion as set out in the assessment in accordance with subsection (1) above and must be summarised in the Statement of Licensing Policy.
- 10.4 Before introducing a Cumulative Impact Assessment the Licensing Authority is required to undertake a formal public consultation process and a CIA can only be introduced where it is supported by evidence. Paragraphs 14.29 to 14.33 of the Home Office Guidance issued under section 182 of the Licensing Act 2003 sets

out what evidence and other matters the Licensing Authority may wish to consider.

11.0 HUMAN RIGHTS, EQUALITIES AND COMMUNITY COHESION IMPLICATIONS

11.1 These are statutory functions and are applied globally.

12.0 CRIME AND DISORDER IMPLICATIONS

12.1 The service has a statutory duty to contribute to the reduction of crime and disorder within the London Borough of Merton under Section 17 Crime and Disorder Act 1988. The prevention of crime and disorder is also one of the licensing objectives as defined in the Licensing Act 2003 and in the Council's current Statement of Licensing Policy.

By examining issues raised such as the possible adoption of a Cumulative Impact Assessment covering specific areas of the borough the licensing authority is contributing to that commitment.

13.0 RISK MANAGEMENT AND HEALTH AND SAFETY IMPLICATIONS

13.1 All risk and health and safety implications have been considered when compiling this report. None are apparent.

14.0 APPENDICES – THE FOLLOWING DOCUMENTS ARE TO BE PUBLISHED WITH THIS REPORT AND FORM PART OF THE REPORT

14.1 Appendix A –Draft Cumulative Impact Assessment for Wimbledon Town Centre and Mitcham Town Centre

14.2 Appendix B – CIA Analysis

14.3 Appendix C – CIA Consultation responses

15.0 BACKGROUND PAPERS - THE FOLLOWING DOCUMENTS HAVE BEEN RELIED ON IN DRAWING UP THIS REPORT BUT DO NOT FORM PART OF THE REPORT

15.1 The Licensing Act 2003
<https://www.legislation.gov.uk/ukpga/2003/17/contents>

15.2 Revised guidance issued under section 182 of the Licensing Act 2003, effective from 20th December 2022.
<https://www.gov.uk/government/publications/explanatory-memorandum-revised-guidance-issued-under-s-182-of-licensing-act-2003>

15.3 House of Commons Library Briefing Paper: Alcohol Licensing, Cumulative Impact assessments
<https://researchbriefings.files.parliament.uk/documents/CBP-7269/CBP-7269.pdf>

15.4 Merton Council Statement of Licensing Policy
<https://www.merton.gov.uk/system/files?file=licensing20policy202021-2026.pdf>

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