



CAMBRIDGE CITY COUNCIL STATEMENT OF LICENSING POLICY

Cambridge is a unique blend of market town, sub-regional centre, national and international tourist attraction and centre of excellence for education and research. It is a city of great beauty and is renowned for the unique qualities of its streets, spaces and buildings.

Cambridge City Council (the Licensing Authority), in association with local partnerships, wants Cambridge to be vibrant, socially mixed, safe, convenient and enjoyable, where all residents feel integrated into the life of the City and a part of its success.

It is recognised that licensed entertainment provides a valuable contribution towards the economy of Cambridge and we seek to balance the needs of local business holders and licensees, whilst protecting those of local residents.

1. Introduction

1.1 This Licensing Policy Statement has been produced in accordance with the requirements of the Licensing Act 2003 ('the Act') and is in line with guidance issued under Section 182 of the Act.

1.2 The policy relates to all those licensing activities identified as falling within the provisions of the Act, namely: -

- Retail sale of alcohol
- Supply of alcohol by or on behalf of a club, or to the order to a member of the club
- The provision of regulated entertainment
- The provision of late night refreshment

1.3 The policy relates to all licensed premises.

1.4 The Licensing Authority will take the policy into account where its discretion is engaged.

1.5 There is no provision for a licensing authority itself to make representations, and in the absence of any relevant representations in

respect of an application, the authority is obliged to issue the licence on the terms sought.

- 1.63 -Nothing in this policy prevents each licence application being considered on its own merits nor will undermine any person from applying for a variety of permissions under the Act.
- 1.74 The Licensing Authority may depart from this policy if the individual circumstances of any case merit such a decision in the interest of the promotion of the licensing objectives. Full reasons will be given for departing from the policy.

2. Objectives

2.1 The Licensing Authority has a duty under the Act to carry out its licensing functions by promoting the licensing objectives, which are: -

- The prevention of crime and disorder
- Public safety
- The prevention of public nuisance, and
- The protection of children from harm.

Each objective has equal importance.

2.2 In carrying out its licensing functions, the Licensing Authority must also have regard to the licensing objectives, its Policy Statement and any statutory guidance under the Act and is bound by The Human Rights Act 1998. The Council must also fulfil its obligations under section 17 of the Crime and Disorder Act 1998 to do all that it reasonably can to prevent crime and disorder in Cambridge.

2.3 It is recognised that the licensing function is only one means of securing the delivery of the above objectives and should not be seen as a means for solving all problems within the community. However, the licensing function is an important means of achieving the objectives. The Licensing Authority will continue to work in partnership with its neighbouring authorities, the police, other agencies, local liaison groups, businesses and individuals towards the achievement of the licensing objectives through good practice.

2.4 The Licensing Authority will expect individual applicants to address the licensing objectives in their operating schedule having regard to the type of premises, the licensable activities to be provided, the operational procedures, the nature of the location and the needs of the local community. Applicants should include in their operating schedule the steps which they consider necessary to promote the licensing objectives. If the steps are insufficient, or if the information given in the operating schedule does not enable a responsible authority or

interested party to assess whether the steps proposed are satisfactory, it is more likely that relevant representations will be received, usually leading to a contested hearing. Applicants are specifically referred to Annex D of the Guidance issued by the Secretary of State under section 182 of the Licensing Act 2003. This Annex sets out pools of conditions relating to each of the licensing objectives. Applicants are encouraged to consider the conditions and include such of them as are relevant in their operating schedule. The Guidance is at www.culture.gov.uk.

3. Consultation

3.1 In preparing this policy statement the Licensing Authority has consulted with the following:

- the Chief Officer of Police for Cambridgeshire
- the Chief Officer of the Cambridgeshire Fire and Rescue Service
- persons/bodies representing local holders of premises licences
- persons/bodies representing local holders of club premises certificates
- persons/bodies representing local holders of personal licences
- persons/bodies representing businesses and residents in the City of Cambridge
- the child protection agency
- other organisations as appear to the Licensing Authority to be affected by licensing matters, including local community, cultural, educational and entertainment organisations.

3.2 We have considered the views of all those consulted prior to determining this policy.

4. Fundamental Principles

4.1 Licensing is about regulating licensable activities on premises, such as qualifying clubs, pubs and temporary events which fall within the terms of the Act. Any conditions imposed will focus on matters that individual licensees and others in possession of relevant authorisations are able to control.

4.2 In addressing these matters, the Licensing Authority will primarily focus on the direct impact the activities taking place at the licensed premises will have on those living, working or engaged in normal activity in the area concerned.

4.3 Licensing law is not the primary mechanism for the general control of nuisance and anti-social behaviour by individuals once they are away

from the licensed premises and, therefore, beyond the direct control of the individual, club or business holding the licence, certificate or permission concerned. Nonetheless, it is a key aspect of such control and licensing law will always be part of a holistic approach to the management of the evening and night-time economy in Cambridge.

5. The cumulative impact of a concentration of licensed premises

5.1 Cumulative impact is the potential impact on the promotion of the licensing objectives of a significant number of licensed premises concentrated in one area e.g. the potential impact on crime and disorder or public nuisance.

5.2 The cumulative impact of licensed premises on the promotion of the licensing objectives is a matter which the Licensing Authority can take into account. This should not, however, be confused with 'need' which concerns the commercial demand for a particular type of premises e.g., a pub, restaurant or hotel. The issue of 'need' is therefore primarily a matter for the market to decide and does not form part of this licensing policy statement.

5.3 The Licensing Authority can only adopt a special policy on cumulative impact if there is evidence that a significant number of licensed premises concentrated in one area is causing a cumulative impact on one or more of the licensing objectives. The Licensing Authority will keep the situation as to whether an area is nearing this point under review.

5.4 The absence of a special policy does not prevent any responsible authority or interested party making representations on a new application for the grant or variation of a licence on the grounds that the premises will give rise to a detrimental cumulative impact on one or more of the licensing objectives in a particular area.

5.5 The Licensing Authority has received ~~a~~ representations from Cambridgeshire Constabulary that within the Cambridge Leisure Park ~~and~~ Cambridge City Centre and Mill Road areas a high concentration of licensed premises has produced a detrimental impact upon the licensing objectives.

5.6 In response to this representation the Licensing Authority has undertaken the following steps in considering whether to adopt a special policy on cumulative effect within this statement of licensing policy:

- Identified concern about crime and disorder or public nuisance
- Considered whether there is good evidence that crime and disorder are happening and are caused by customers of

licensed premises and that the risk of cumulative impact is imminent

- Identified the boundaries of the areas where problems are occurring
- Consulted with those specified in section 5(3) of the Licensing Act 2003, on the proposal for a special policy in relation to new applications and variations to existing premises licences and club premises certificates and considered the outcome of the consultation

5.7 Having considered the available evidence and undertaken consultation, the Licensing Authority considers that it is appropriate and necessary to control cumulative impact. The Licensing Authority is adopting a special policy relating to cumulative impact to the areas set out in paragraph 5.8 below.

Special Policy on Cumulative Effect

5.8 The Licensing Authority is adopting a special policy relating to cumulative impact in relation to the areas of the City:

- Within the city centre marked on the map at Appendix 1
- At the Cambridge Leisure site marked on the map at Appendix 2.
- ~~With effect from 22 May 2008~~ The entire length of Mill Road Cambridge (excluding Brookfields)

5.9 The evidence for this special policy is set out in Appendix 3

5.10 This special policy creates a rebuttable presumption that applications within the areas set out in paragraph 5.8 for new premises licences or club premises certificates or variations that are likely to add to the existing cumulative impact will normally be refused, if relevant representations are received about the cumulative impact on the licensing objectives, unless the applicant can demonstrate why the operation of the premises involved will not add to the cumulative impact already being experienced.

5.11 Applicants will need to address the special policy issues in their operating schedules in order to rebut such a presumption.

5.12 Despite the presumption against grant, responsible authorities and interested parties will still need to make a relevant representation before the Licensing Authority may lawfully consider giving effect to its special policy i.e. if no representation is received, the application must be granted (subject to such conditions as are consistent with the operating schedule and any mandatory conditions required by the Licensing Act 2003). Responsible authorities and interested parties can make a written representation referring to information which had been before the Licensing Authority when it developed its statement of licensing policy.

5.13 The Licensing Authority recognises that a special policy should never be absolute. The circumstances of each application will be considered properly and applications for licences and certificates that are unlikely to add to the cumulative impact on the licensing objectives may be granted. After receiving representations in relation to a new application or for a variation of a licence or certificate, the licensing authority will consider whether it would be justified in departing from its special policy in the light of the individual circumstances of the case. The impact can be expected to be different for premises with different styles and characteristics. If the Licensing Authority decides that an application should be refused, it will still need to show that the grant of the application would undermine the promotion of the licensing objectives and that necessary conditions would be ineffective in preventing the problems involved.

5.14 This special policy will not be used:

- as a ground for revoking an existing licence or certificate when representations are received about problems with those premises
- to justify rejecting applications to vary an existing licence or certificate except where those modifications are directly relevant to the policy (as would be the case with an application to vary a licence with a view to increasing the capacity limits of the premises) and are strictly necessary for the promotion of the licensing objectives
- to include any provisions for a terminal hour in any particular area which might impose a fixed closing time akin to that under the 'permitted hours' provisions of the Licensing Act 1964
- to impose quotas - based on either the number of premises or the capacity of those premises - that restrict the consideration of any application on its individual merits or which seek to impose limitations on trading hours in particular areas. Quotas have no regard to individual characteristics of the premises concerned. Proper regard will be given to those differences and the differing impact they will have on the promotion of the licensing objectives

5.15 This special policy will be reviewed regularly to assess whether it is still needed or should be expanded

Other mechanisms for controlling cumulative impact

5.16 Once away from the licensed premises, a minority of consumers will behave badly and unlawfully. However, there are other mechanisms, both within and outside the licensing regime, that are available for addressing such issues. For example:

- planning controls
- positive measures to create a safe and clean environment in partnership with local businesses, transport operators and others
- the provision of CCTV and ample taxi ranks

- powers to designate parts of the city as places where alcohol may not be consumed publicly
 - confiscation of alcohol from adults and children in designated areas
 - police enforcement of the law with regard to disorder and anti-social behaviour, including the issuing of fixed penalty notices
 - police powers to close some premises for up to 24 hours on the grounds of disorder, the likelihood of disorder or excessive noise
 - the power of police, local businesses or residents to seek a review of the licence or certificate
 - enforcement action against those selling alcohol to people who are drunk.
- 5.17 The above can be supplemented by other local initiatives that similarly address these problems, for example, through the Cambridge Community Safety Partnership in line with the strategic objectives for crime and disorder reduction within the City.

6. Licensing Hours

- 6.1 Flexible licensing hours for the sale of alcohol can help to ensure that concentrations of customers leaving premises simultaneously are avoided. This can help to reduce the potential for disorder and disturbance. Licensing hours should not inhibit the development of a thriving and safe evening and night-time economy. This is important for investment, local employment, tourism and local services associated with the night-time economy. Providing customers with greater choice and flexibility is an important consideration, but should always be balanced carefully against the duty to promote the four licensing objectives and the rights of local residents to peace and quiet.
- 6.2 Shops, stores and supermarkets will generally be permitted to provide sales of alcohol for consumption off the premises at any times when the retail outlet is open for shopping, unless representations raise good reasons based on the licensing objectives, for restricting those hours, for example, a limitation may be appropriate following police representations in the case of shops known to be a focus of disorder and disturbance.
- 6.3 The Licensing Authority will deal with the issue of licensing hours on the individual merits of each application. However the presumption will be to grant the hours requested unless objections to those hours have been raised by responsible authorities or interested parties on the basis of the licensing objectives. When issuing a licence, stricter conditions on noise control are likely to be imposed in the case of premises which are situated in predominantly residential areas. However, this should not limit opening hours without regard to the individual merits of any application.

7. Children and Licensed Premises

- 7.1 There are a great variety of premises for which licences may be sought including theatres, cinemas, restaurants, pubs, nightclubs, cafes, take aways, community halls and schools. Access by children to any premises will not be limited unless it is considered necessary for the prevention of physical, moral or psychological harm to them.
- 7.2 Conditions requiring the admission of children to any premises cannot be attached to licences or certificates. Where no licensing restriction is necessary, this should remain a matter for the discretion of the individual licensee or club or person who has been given a temporary event notice.
- 7.3 When deciding whether to limit access to children, the Licensing Authority will consider each application on its merits. Particular areas that will give rise to concern in respect of children, would include premises –
- where entertainment or services of an adult or sexual nature are commonly provided
 - where there is a strong element of gambling on the premises
 - with a known association with drug taking or dealing
 - where there have been convictions of members of the current staff at the premises for serving alcohol to minors or with a reputation for underage drinking
 - where the supply of alcohol for consumption on the premises is the exclusive or primary purpose of the services provided at the premises.
- 7.4 The range of alternatives which may be considered for limiting access to children where that is necessary for the prevention of harm to children are:
- limitations on the hours when children may be present
 - age limitations (below 18)
 - limitations on the exclusion of the presence of children under certain ages when particular specified activities are taking place
 - requirements for accompanying adults
 - full exclusion of those people under 18 from the premises when any licensable activities are taking place
 - limitations on the parts of premises to which children might be given access.
- 7.5 In the case of premises which are used for film exhibitions conditions will be imposed restricting access only to those who meet the required age limit in line with any certificate granted by the British Board of Film Classification or, in specific cases, a certificate given to the film by the Council itself.

- 7.6 The Licensing Authority recognises the Office of Children and Young People's Services (Social Care) of Cambridgeshire County Council as being competent to advise on matters relating to the protection of children from harm.
- 7.7 The Licensing Authority commends the Portman Group Code of Practice on the Naming, Packaging and Promotion of Alcoholic Drinks. The Code seeks to ensure that drinks are packaged and promoted in a socially responsible manner and only to those who are 18 years old or older.

8. Licence Conditions

- 8.1 A key concept of the Act is for conditions to be attached to licences and certificates, which are tailored to the individual style and characteristics of the premises and events concerned. This is essential to avoid the imposition of disproportionate and overly burdensome conditions on premises where there is no need for such conditions.
- 8.2 The Licensing Authority cannot attach conditions to premises licences and club premises certificates unless they are considered necessary for the promotion of the licensing objectives. The Licensing Authority may only attach conditions (except for statutory mandatory conditions and conditions drawn from the operating schedule) if relevant representations have been received. ~~The Licensing Authority may only attach conditions (except for conditions drawn from the operating schedule) if relevant representations have been received.~~ Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.
- 8.3 Where appropriate, the Licensing Authority will draw upon pools of conditions issued under the Act and attach necessary and proportionate conditions (see paragraph 2.4). Blanket standard conditions will not be imposed.
- 8.4 The model conditions cover, among other things, issues surrounding –
- crime and disorder,
 - public safety (including fire safety and means of escape)
 - theatres and cinemas (promotion of public safety)
 - public nuisance
 - protection of children from harm.
- 8.5 Crime Prevention: conditions attached to premises licences and club premises certificates will, so far as possible, reflect local crime prevention strategies e.g. the provision of closed circuit television cameras in certain premises.

8.6 In deciding what conditions should be attached to licences and certificates to promote the licensing objectives, the Licensing Authority will be aware of the need to avoid measures which might deter live music, dancing or theatre by imposing indirect costs of a substantial nature. Only necessary, proportionate and reasonable conditions will be imposed on such events. Where there is any indication that such events are being deterred by licensing requirements, the policy will be revisited with a view to investigating how the situation might be reversed.

8.7 Applicants should consider the measures which they propose to control noise nuisance from the premises or from departing customers. Depending on the individual circumstances, this may include:

- Sound limitation devices
- Acoustic lobbies
- Acoustic double glazing
- Noise insulation
- Specifying non amplified or acoustic music only
- Notices requesting customers to leave quietly
- A dedicated taxi service
- Use of door supervisors at exit points
- A winding down period during which music is turned down and lights up, alcohol service ceases and sales of food and hot and cold soft drinks continues and requests are made for customers to leave quietly.

9. Integrating Strategies and the avoidance of duplication

9.1 By consultation and liaison, the Licensing Authority will secure the proper integration of this licensing policy with local crime prevention, planning, transport, tourism, race equality and equal opportunity schemes, cultural strategies and any other plans introduced for the management of the city and the night-time economy. Many of these strategies directly impact upon the four licensing objectives.

9.2 Transport: Where any protocols to be agreed with the police identify a particular need to disperse people from the city swiftly and safely to avoid concentrations which could lead to disorder and disturbance, the Licensing Authority will aim to inform those responsible for providing local transportation so that arrangements can be made to reduce the potential for problems to occur.

9.3 Tourism, employment, planning and building control: The Council's Licensing Committee will receive, when appropriate, reports on -

- the needs of the local tourist economy for the area to ensure that these are reflected in their considerations

- the employment situation in the area and the need for new investment and employment where appropriate.
- 9.4 Planning, building control and the licensing regimes will be separated to avoid duplication and inefficiency. Licensing applications will not be a re-run of the planning application and will not cut across decisions taken by the planning committee or following appeals against decisions taken by that committee. When a terminal hour has been set as a condition of planning permission that is different from the licensing hours, the applicant must observe the earlier of the two closing times.
 - 9.5 So far as is possible, the policy is not intended to duplicate existing legislation and regulatory regimes that already place obligations on employers and operators.
 - 9.6 Cultural strategies: The Licensing Authority will monitor the impact of licensing on the provision of regulated entertainment, and particularly live music and dancing. As part of implementing cultural strategies, proper account will be taken of the need to encourage and promote a broad range of entertainment, particularly live music, dancing, circus activity, street art and theatre, including the performance of a wide range of traditional and historic plays for the wider cultural benefit of the community which also balances the evening economy. The Licensing Authority will balance the prevention of disturbance in neighbourhoods with these wider cultural benefits, particularly the cultural benefits for children. Only necessary, proportionate and reasonable conditions will be imposed on such events.
 - 9.7 The absence of cultural provision in any area can lead to young people being diverted into anti-social activities that damage local communities and the young people involved themselves.
 - 9.8 Cambridge City Council has an important role in coordinating events in the City and to ensure that cultural diversity thrives. The Council currently has five licensed open spaces. These are: Parkers Piece; Jesus Green; Midsummer Common; Coldhams Common and the grounds of Cherry Hinton Hall.
 - 9.9 Promotion of Racial Equality: The Race Relations Act 1976, as amended by the Race Relations (Amendment) Act 2000, places a legal obligation on public authorities to have due regard to the need to eliminate unlawful discrimination; and to promote equality of opportunity and good relations between persons of different ethnicity.
 - 9.10 Applicants will be encouraged to make themselves aware of any relevant planning and transportation policies, tourism and cultural strategies or local crime prevention strategies and to have taken these into account, where appropriate, when formulating their operating schedule.

9.11 The Licensing Authority will have regard to equality and will expect an applicant to meet their statutory obligations in this area and not unlawfully discriminate or refuse service on grounds of race, gender, disability or age, or display discriminatory signs.

10. Licence Reviews

10.1 The process set out in the Licensing Act 2003 for reviewing premises licences represents a key protection for the community where problems associated with the licensing objectives are occurring after the grant or variation of a premises licence.

10.2 The Licensing Authority cannot itself initiate the review process. Only responsible authorities and interested parties (i.e. local residents, local organisations and councillors) can apply for the review of a licence.

10.3 The Licensing Authority will work in partnership with responsible authorities to achieve the promotion of the licensing objectives and will encourage responsible authorities to give licensees early warning of any concerns identified at a premises.

10.4 When a review has been requested the role of the Licensing Authority will be to administer the process and determine its outcome at a hearing.

10.5 The Licensing Authority may decide that no action is necessary if it finds that the review does not require it to take any steps necessary to promote the licensing objectives. In appropriate cases the Authority may issue an informal warning to the licence holder and/or recommend improvement within a particular period of time. Any warnings or recommendations will be issued in writing.

10.6 Where the Licensing Authority considers that action under its statutory powers is necessary it may take any of the following steps:

- to modify the conditions of the premises licence (which includes adding new conditions or any alteration or omission of an existing condition);
- to exclude a licensable activity from the scope of the licence;
- to remove the designated premises supervisor;
- to suspend the licence for a period not exceeding three months;
- to revoke the licence.

10.7 In cases where the crime prevention objective is being undermined the Licensing Authority will give serious consideration to revoking the licence even in the first instance.

11. Enforcement

110.1 The Licensing Authority intends to establish protocols with the police and any other relevant enforcement body on enforcement issues. These protocols will provide for the targeting of agreed problem and high-risk premises, which require greater attention, while providing a lighter touch approach in respect of low risk premises which are well run.

110.2 In general, action will only be taken in accordance with the Council's enforcement policy, as adopted at the time, which reflects ~~the~~ the Council's obligations relating to enforcement agreed principles, and is which are consistent with the ~~Enforcement Concordat policy or the Regulators Compliance Code~~ once this replaces the Enforcement Concordat. To this end, the key principles of consistency, targeting, transparency openness, and proportionality, clear standards and practices, courtesy and helpfulness and training will be maintained. ~~The Regulators Compliance Code is likely to place new obligations on enforcement agencies that may include supporting economic process, risk assessment, information and advice, inspections, data requirements, compliance and enforcement actions and accountability.~~ Cambridge City Council's enforcement policy is available on our website www.cambridge.gov.uk

124. Administration, exercise and delegation of functions

124.1 The functions of the Licensing Authority under the Act may be carried out by the Licensing Committee, by a Sub-Committee or by one or more officers acting under delegated authority.

124.2 Many of the decisions and functions will be largely administrative in nature. In the interests of speed, efficiency and cost-effectiveness these will, for the most part, be delegated to officers.

132. Effective Date and Review

132.1 This policy statement will ~~take~~ take effect on 7th January 2011~~08~~, ~~and was amended with effect from 22nd May 2008 to add Mill Road to the special policy on cumulative impact.~~

132.2 The policy statement will be kept under review and will remain in existence for a period of up to 3 years. It will be subject to review and further consultation before 7th January 2014~~4~~, or as required by law.

143. Contact details, advice and guidance

143.1 Applicants can obtain further details about the licensing and application processes, including application forms and fees from:

website: www.cambridge.gov.uk

e-mail: licensing@cambridge.gov.uk
telephone: 01223 457879
fax: 01223 457909
office location: Licensing, Environmental Services, Cambridge
City Council, ~~Mandela House PO Box 700,~~
~~4, Regent Street,~~ Cambridge, CB12 0JH-4BY

14.2 The Licensing Authority has also published further documents to accompany this policy containing additional details about each type of application and the review process. These can be viewed at <http://www.cambridge.gov.uk/ccm/navigation/business/business-and-street-trading-licences/entertainment-licences/> (to confirm/update)

14.3 This policy can be made available in large print on request and similarly translations can be made available in a variety of languages. Please contact us for further help or assistance.

14.4 The Council, Police and Fire Authorities will be willing to give advice and guidance to applicants.

14.5 Informal discussion is encouraged prior to the application process in order to resolve any potential problems and avoid unnecessary hearings and appeals.

15. Responsible Authorities are: - (for sending copies of applications)

The Chief Officer of Police

The Chief Officer, Cambridgeshire Constabulary, Southern Division,
Police Station, Parkside, Cambridge, CB1 1JG
Telephone: 01223 823397 Fax: 01223 823232

The Fire Authority

The Chief Fire Officer, Cambridgeshire Fire & Rescue Service,
Cambridge Fire Station, Parkside, Cambridge, CB1 1JF.
Attention: Licensing
Telephone: 01223 376200 Fax: 01223 376229
e-mail: alanpi@cambsfire.gov.uk

Health & Safety

The Food & Occupational Safety Team, Environmental Services,
Cambridge City Council, Mandela House, 4, Regent Street, Cambridge,
CB2 1BY
Telephone: 01223 457900 Fax: 01223 457909
e-mail: env.health@cambridge.gov.uk

Planning

Environment & Planning, Cambridge City Council, The Guildhall,
Cambridge, CB2 3QJ

Telephone: 01223 457100 Fax: 01223 457109

e-mail: planning@cambridge.gov.uk

Environmental Services

The Environmental Protection Manager, Environmental Services,
Cambridge City Council, Mandela House, 4, Regent Street, Cambridge,
CB2 1BY

Telephone: 01223 457890 Fax: 01223 457909

e-mail: env.health@cambridge.gov.uk

Child Protection

Audit Manager, Child Protection and Review Unit, Licensing
Applications, Box SS1035, 18-20 Signet Court, Swann's Lane,
Cambridge, CB5 8LA

Telephone: 01223 718637 Fax: 01223 718153

e-mail: peter.wilson@cambridgeshire.gov.uk

Trading Standards

Cambridgeshire County Council, PO Box 450, Cambridge City, CB3
6ZR

e-mail: trading.standards@cambridgeshire.gov.uk

In addition, for vessels:

Environment Agency

The Team Leader, Great Ouse & Stour Waterways, The Environment
Agency, Kingfisher House, Goldhay Way, Orton Goldhay,
Peterborough, PE2 5ZR.

Telephone: 01733 464072

e-mail: enquiries@environment-agency.gov.uk, quoting Great Ouse &
Stour Waterways

Conservators of the River Cam

~~Clerks to the Conservators of the River Cam, Archer & Archer Solicitors~~

~~Clerks, Market Place, Ely, Cambridgeshire, CB7 4QN~~

~~Telephone: 01353 662203 Fax: 01353 667714~~

~~e-mail: info@archerandarcher.co.uk —~~

The River Manager

Conservators of the River Cam

Baits Bite Lock, Fen Road, Milton, Cambridge, CB4 6AF

Telephone/Fax 01223 863785

e-mail river.manager@camconservators.org.uk

Maritime & Coastguard Agency

Surveyor in Charge, Harwich Marine Office, Maritime & Coastguard Agency, East Terrace, Walton-on-Naze, Essex, CO14 8PY

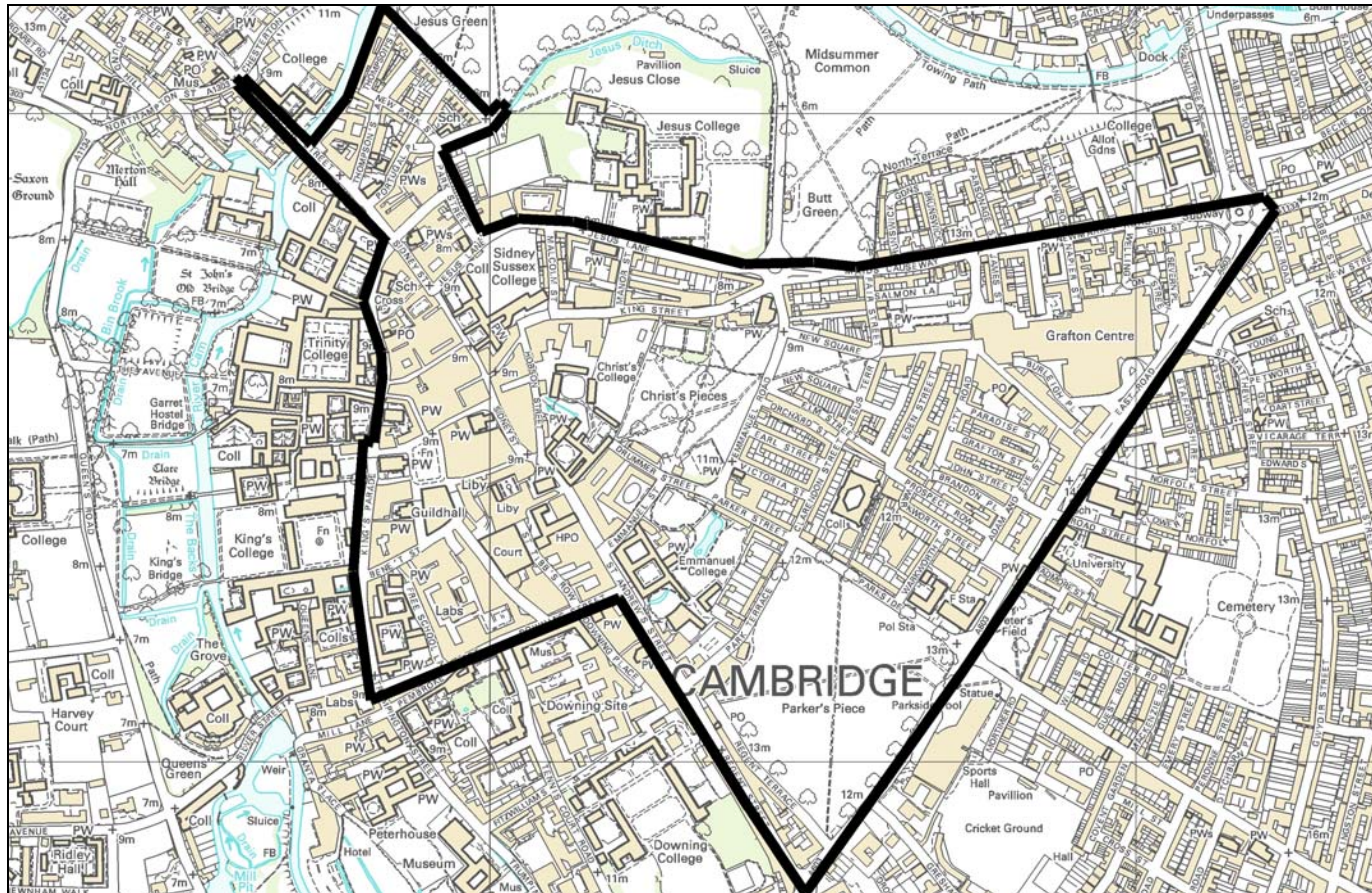
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~~Informal discussion is encouraged prior to the application process in order to resolve any potential problems and avoid unnecessary hearings and appeals.~~

Appendix 1
Cumulative Impact Area City Centre



Appendix 3

Violent Crime and Anti-Social Behaviour in Cambridge City Sector April 2004 to March 2007

Summary

Cambridge City centre is suffering a disproportionate amount of violent crime and ASB for its geographical size. Temporal analysis shows this can be linked to the night time economy. A Cumulative Impact area in the City Centre has been identified which incorporates 90% of ASB and violent crime.

In addition to this, the area around the Old Cattle Market should also be considered for a cumulative impact zone. (see Map 2). This is because the numbers of offences there are increasing and it is suffering a disproportionate amount in comparison with its geographical size.

Link between the night-time economy and violence and ASB

The night-time economy is a setting in which violent crime commonly occurs. Incidents are often clustered within small, well-defined areas of late night entertainment districts and can sometimes be linked to specific premises. A substantial proportion of this violence involves people who have been drinking¹. National research shows that:

- In nearly half (44%) of all violent incidents, victims believed offenders to be under the influence of alcohol.
- This figure rose to 54% in cases of 'stranger violence'².

Table to show the number of violent crimes and anti-social behaviour incidents in the 3 requested areas over the period.

Location	Offence	2004/2005	2005/2006	2006/2007	Total
City Centre	Violent Crime	389	597	762	1748
	ASB	721	1490	1979	4190
	Total	1110	2087	2741	5938
Old Cattle Market Area	Violent Crime	76	76	70	222
	ASB	153	199	288	640
	Total	229	275	358	862
Cambridge City Sector	Violent Crime	3114	2254	2471	7839
	ASB	7060	7191	9350	23601
	Total	10174	9445	11821	31440

¹ Findings 214, Violence in the night-time economy: key findings from the research. 2004.

² Figures from British Crime Survey 2005/2006, taken from www.homeoffice.gov.uk

(Please note that figures provided do not include offences of criminal damage).

- Between 2004 – 2007 the number of offences committed within the City Centre increased by 146%.
- 19% of all violent crime and ASB that occur within Cambridge City Sector take place in the City Centre. This is disproportionate, considering that geographically the City Centre comprises only 4% of Cambridge City Sector.³
- 3% of violent crime and ASB occurs at the Old Cattle Market Area, again this is disproportionate considering the geographical size of the area.
- The number of offences committed within the City Centre and Old Cattle Market area is increasing year on year at a higher rate than offences across Cambridge City Sector.
- 71% of the incidents reported were given the final call type of rowdy or inconsiderate behaviour⁴.
- After the changes to the pub licensing laws offence levels fell for a couple of months, however they then climbed to a level higher than prior to the changes.

Cambridge City Centre

- 58% of violent crimes and 54% of anti-social behaviour incidents occur over the weekend (Friday, Saturday and Sunday), which can be associated with the night time economy and drinking in the City Centre.
- Violent crimes and ASB peaked between 7pm – 1am which again is associated with the night time economy.
- The most commonly occurring violent crime types were ABH, common assault and harassment causing alarm or distress. It is low level violent offences such as these which are most commonly associated with the night time economy.

Area highlighted as a potential cumulative impact zone

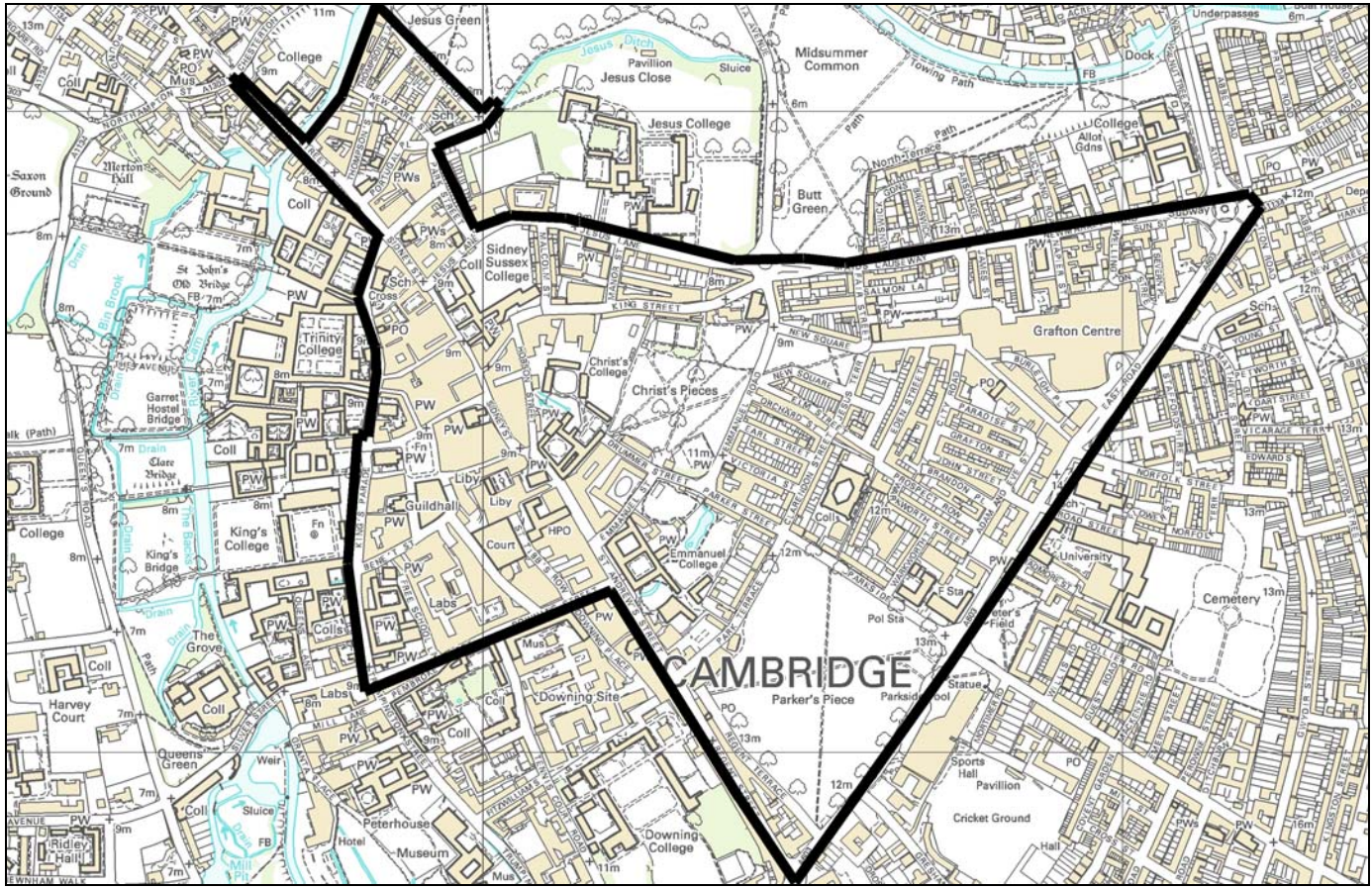
The City Centre is the hotspot for offences within the whole of Cambridge City. This led to the identification of a cumulative impact area outlined on Map 1.

Approximately 90% of all violence and 91 % of ASB within the city centre occurs within the area in Map 1 (this includes both sides of the road boundaries).

- This area contains all of the City Centre Nightclubs, including: Ballare, Twentytwos, the Fez club, the Soul Tree and the Kambar.
- Included within the area are also a number of the bars and pubs in the city centre, including: the Regal, the Bath House, the Cow, the B Bar, Ta Bouche and the Slug and Lettuce.
- The main taxi rank is located on Sidney Street.
- Two night time fast food vendors operate on the Market Square, with the Fez Club, Ta Bouche and the B bar located on Market Passage.

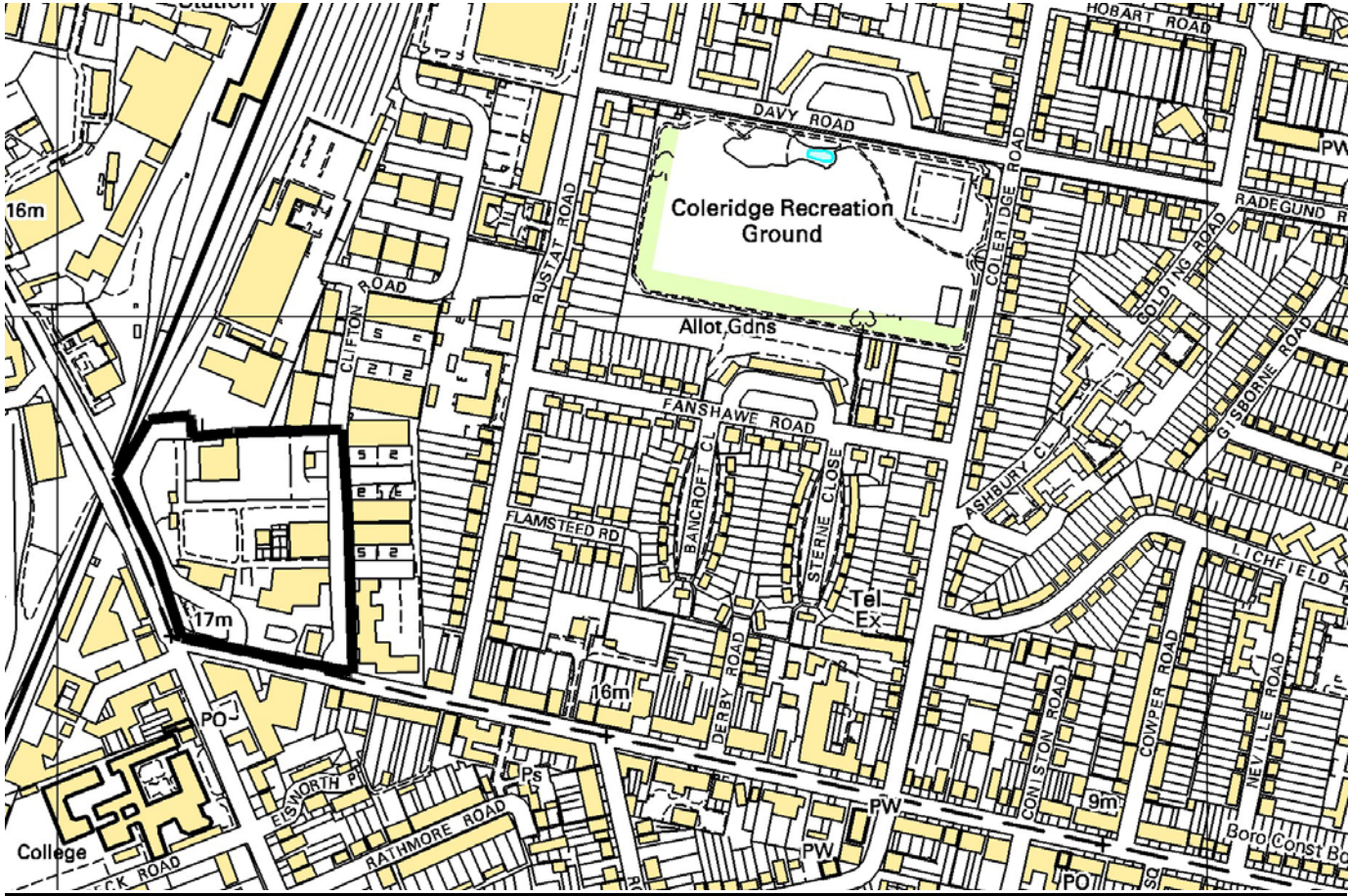
³ Cambridge City Sector 4070 Hectares; Market Ward 169 Hectares

⁴ Reports of rowdy behaviour and general nuisance in a public place or in any place to which the public have access. Not to be used in circumstances that amount to a domestic incident or notifiable crime. The category will include: shouting and swearing; rowdy noisy behaviour; drunken behaviour; climbing on buildings, throwing stones, letting down tyres, playing football or other 'games' in inappropriate areas, urinating in public, impeding access to communal areas. (summary of NSIR category description)



Cumulative Impact Area City Centre

Cumulative Impact Area. Old Cattle Market



Mrs Christine Allison
The Licensing Officer
Environmental Services
Mandela House
4 Regent Street
Cambridge CB2 1BY



17th September 2007

Dear Mrs Allison

Licensing Act 2003 - Response to Consultation on the review of the Statement of Licensing Policy and the inclusion of a Cumulative Impact Policy

I strongly recommend that the Licensing Authority establish a cumulative impact policy covering the areas of the Cambridge Leisure Park and Cambridge city centre. In both these areas a high concentration of licensed premises has produced a negative impact upon the Licensing Objectives, in particular the prevention of crime and disorder, public safety, and the prevention of public nuisance.

Cambridge City Centre

The proposed cumulative impact area within Cambridge city centre accounted for 21% of all violent crime, criminal damage, and anti-social behaviour occurring between 2006 and 2007 in Cambridge City. Offences peak between Saturday night and the early hours of Sunday morning, and 53% of offences and incidents recorded occur between Friday and Sunday. This concentration of offences over the weekend period provides a strong link with excessive alcohol consumption; at least 33% of all peak-time offences and incidents within the proposed impact area are alcohol related.

Cambridge Leisure Park

The proposed cumulative impact area at the Leisure Park accounted for 1% of all violent crime, criminal damage and anti-social behaviour between 2006 and 2007 in Cambridge City. This small percentage of overall crime represents a significant level given the size of the area; the Leisure Park was subject to 48.7 such offences per hectare, when the

overall level across the city was 3.4 offences per hectare. Again offences peak over the weekend, and a minimum of 20% of peak-time offences and incidents are alcohol related.

A further piece of analytical work has been completed entitled 'Violent Crime, Criminal Damage, and ASB in Cambridge City 2004 -2007 Evidence for a Cumulative Impact Policy'. The acquisition of new software, and the incorporation of evidence from the East of England Ambulance service has enabled the production of a more in depth analysis of potential areas where the concentration of licensed premises is likely to impact negatively upon the Licensing Objectives. This document is attached and adds further weight to our initial submission that the city centre and Cambridge Leisure Park areas are subject to high levels of alcohol related disorder, violent crime and anti-social behaviour, and that this impact is linked to the concentration of licensed premises.

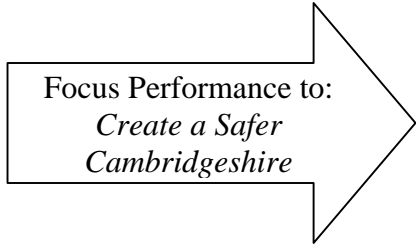
Mill Road

There is also clear evidence presented within the same document that Mill Road suffers a similarly disproportionate level of alcohol related disorder and crime linked to the density of licensed premises in the area; Mill Road contains some 40 licensed premises. This road accounted for 3% of all violent crime, criminal damage and anti-social behaviour between 2006 and 2007 in Cambridge City. Once again the area covered by the road renders such a level of crime disproportionate, being subject to 38.3 offences per hectare. Offences peak over the weekend, and at least 27% of peak-time offences are alcohol related. Mill Road has previously been identified as suffering the highest rate of violence against the person, hate crime, and anti-social behaviour in Cambridge City. It is also the case that this area is subject to alcohol related anti-social behaviour linked to the street life community, and that for several years it has been necessary to impose a Dispersal Order. Based upon this above evidence I further request that, following any further consultation necessary, the committee consider including the entire length of Mill Road within a Cumulative Impact Policy.

I am confident that the adoption of a cumulative impact policy will assist our continued work in partnership to create a safer, pleasanter, environment for those working, living, and visiting our city.

Yours Sincerely

Rob Needle
Chief Superintendent
Divisional Commander



Focus Performance to:
*Create a Safer
Cambridgeshire*



Violent crime, criminal damage and ASB in Cambridge City 2004-2007

Evidence for a Cumulative Impact Policy V4

Background

The Licensing Act 2003 provides a clear focus on the promotion of four statutory objectives which must be addressed when licensing functions are undertaken. They are:

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

In areas where there is a significant concentration of licensed premises and there is sufficient evidence of negative impact on the statutory objectives The Licensing Act gives provision for the adoption of a Cumulative Impact Policy. The effect of adopting such a policy is to create a rebuttable presumption that applications for new premises licenses or major variations will be refused if representations are made about the likely impact of the proposals on the licensing objectives. This effectively requires the applicant to demonstrate that the operation of the premises involved will not add to the cumulative impact already being experienced.

Purpose

The purpose of this report is to provide evidence to Cambridge City Council Licensing Committee of defined areas within Cambridge City Centre where there are significant levels of crime and disorder that can be reasonably attributed to a high concentration of licensed premises within the area.

Methodology & Data Sources

The location of all licensed premises in Cambridge City was sourced from the licensed premises database by PC Pete Sinclair licensing officer. Licensed premises analysed included licensed public houses, restaurants, off-licences, café/take-aways, leisure/cinema/sports, clubs, wine bars, schools/colleges and hotels. It did not include betting shops, amusement arcades, conference centres, village/community halls and 'other' licensed premises. The licensed premises were mapped enabling the concentration of premises and proximity to crime and disorder hotspots to be ascertained.

Violent crime and criminal damage offences and anti-social behaviour incidents that occurred between 01/04/2004 and 31/03/2007 were extracted from the Force data warehouse using i2 workstation.

These records were then mapped using Blue 8 software to show the locations of the highest concentrations of offences and incidents in Cambridge City. The data was subsequently analysed for temporal and other offence/incident patterns.

Ambulance pick-up data was sourced from the East of England Ambulance Service concerning ambulance callouts involving assaults and overdoses⁵ between 01/01/2003 and 05/10/2006. This data was mapped and analysed.

The Local Authority Alcohol Profiles for the East of England produced by the Eastern Region Public Health Observatory provided estimates around levels of binge drinking and alcohol-related hospital admissions in Cambridge between 2002 and 2004.

⁵ Relating to alcohol and/or drugs

1. Licensed Premises in Cambridge City

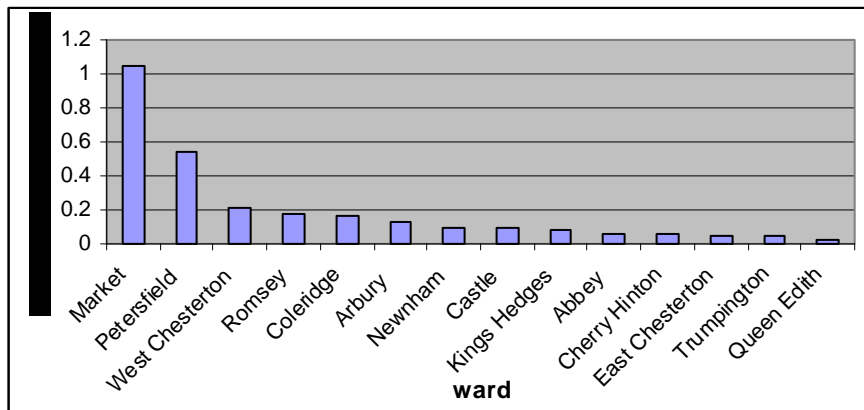
1.1) Market Ward

There are 532 licensed premises⁶ within Cambridge City.

176 (33%) of Cambridge City licensed premises are found in Market ward which encompasses the main city centre area of Cambridge.

Analysing the number of licensed premises per hectare by ward in Cambridge City shows that Market beat has double the density of licensed premises to any other ward in Cambridge City (1.0 per hectare). The second highest ward for density of licensed premises is Petersfield (0.5). All other wards have a density of less than 0.25 licensed premises per hectare.

Fig.1 Licensed premises per hectare by ward in Cambridge City August 2007



The grid analysis⁷ map on the following page (see Fig. 2) illustrates the areas of highest density of licensed premises. This illustrates that the main hotspot area for licensed premises is the central area of Market ward.

The boxed area is then magnified in Figure 3 to show a dot map of the licensed premises in that area.

⁶ This includes licensed public houses, restaurants, off-licences, café/take-aways, leisure/cinema/sports, clubs, wine bars, and hotels. This does not include betting shops, amusement arcades, conference centres, village/community halls and 'other' licensed premises.

⁷ Map divided into squares of 900m for purpose of analysis.

Fig.2 Grid analysis of licensed premises within Cambridge City August 2007.

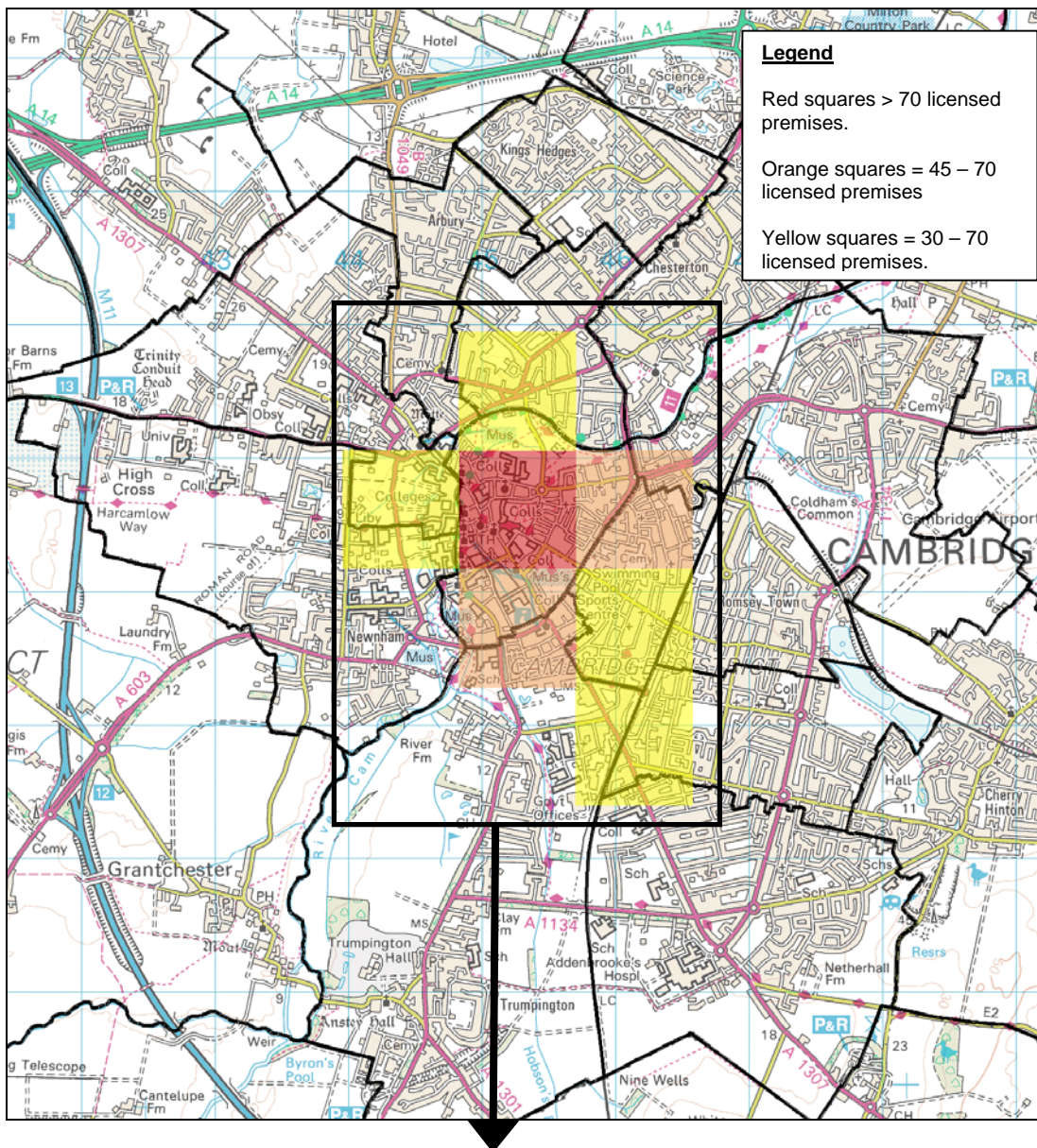


Fig.3 Licensed premises within Market ward and surrounding area August 2007

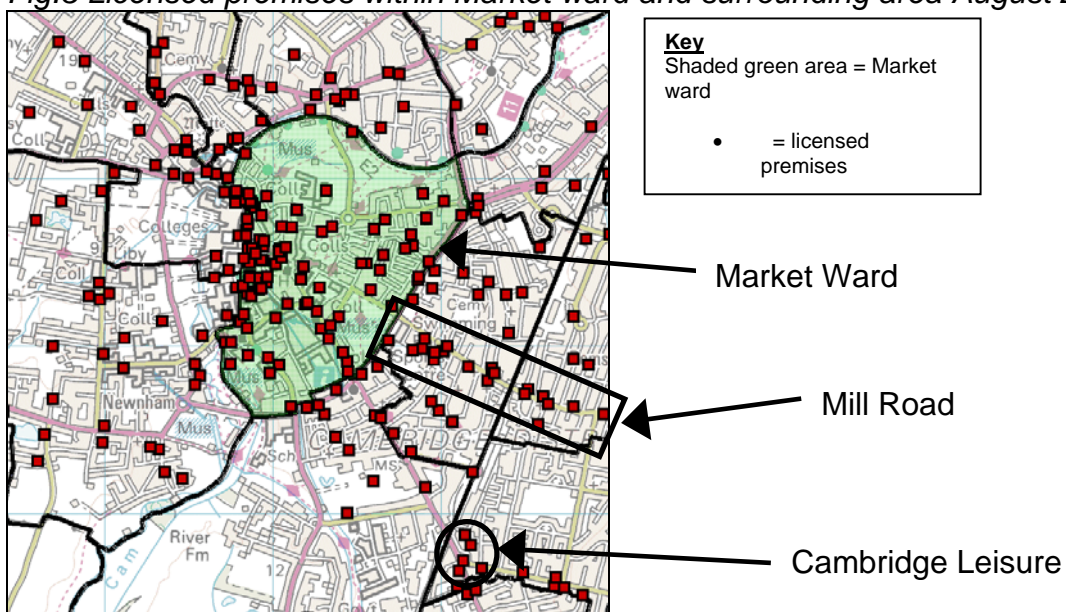
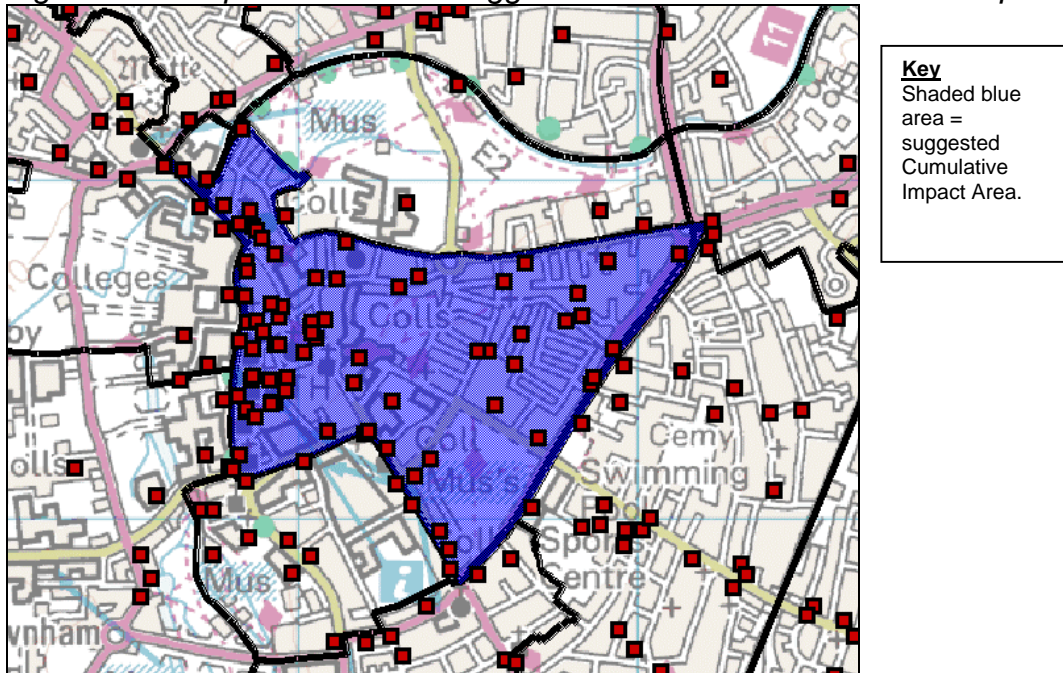


Figure 3 illustrates that the majority of the licensed premises in Market ward are clustered in the area bounded by Sidney Street, Kings Parade and Benet Street. There is also a high density of licensed premises along Regent Street and St Andrews Street.

The area suggested for the Cumulative Impact Policy by Inspector Porter and PC Sinclair is shown below in Figure 4. The area encompasses the main city centre area following the boundary of Gonville Place, East Road, Maids Causeway, Jesus Lane, Park Street, Pak Parade, Quayside, Magdalene Street, Kings Parade, Downing Street, St Andrews Street, and Regent Street. A comprehensive list of streets enclosed by the area can be found in Appendix A.

Fig.4 Licensed premises within suggested Market ward Cumulative Impact Area



Of note the area contains:

- 153 licensed premises in 89 hectares (1.7 premises per hectare) - this equates to 87% of all licensed premises within Market ward in 53% of the area.
- All of the City Centre nightclubs (6) – Ballare, Fez Club, Soul Tree, Club 22, Niche (Pure), Kamar.
- 34 pubs/bars including large chain premises such as The Regal (Wetherspoons) and the Slug and Lettuce and smaller independent venues.
- 56 restaurants/cafes.
- 8 take-aways including two fast food vans located on Market Square.
- 12 Cambridge University college bars.
- 2 main taxi ranks (Sidney Street and Drummer Street).

1.2) Mill Road

49% of all licensed premises in Petersfield are on Mill Road (25). A further 15 licensed premises are located on the Romsey section of Mill Road. This gives Mill Road a total of 40 licensed premises and a density of 4.0 licensed premises per hectare. The majority of these licensed premises are made up of off-licences (15), restaurants (10) and cafés/take-aways (7).

Mill Road has historically been known as an area where street-life individuals congregate and may drink/take drugs and cause disorder. This has resulted in this area being

subject to a Section 30 dispersal order which has subsequently been extended to cover a large area of the City Centre.

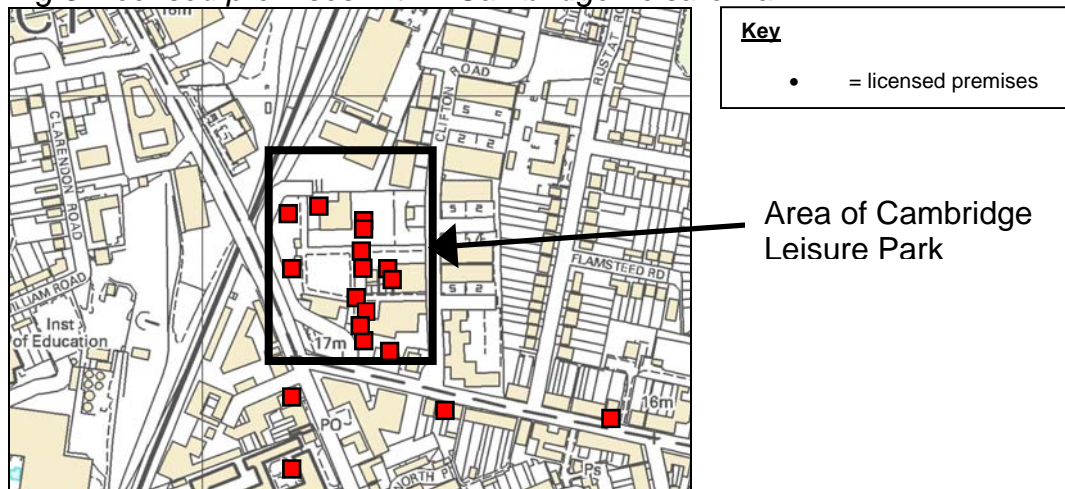
1.3) Cambridge Leisure Park

Another area of Cambridge City with a particularly high density of licensed premises is Cambridge Leisure Park. The leisure park contains 15 licensed premises in an area of 3 hectares giving a density of 5.0 licensed premises per hectare.

The licensed premises break down as follows:

- 1 nightclub - The Junction.
- 4 bars – Nusha, Travel Lodge bar, bowling alley bar, Cineworld bar.
- 8 restaurants/cafes.
- 1 kebab van located in bus lay-by outside Leisure Park on Cherry Hinton Road.
- 1 theatre – The Junction Theatre.

Fig 5 Licensed premises within Cambridge Leisure Park



NB: Map taken from Force Blue 8 mapping system which does not have up to date layout of Leisure park.

The table below indicates that the suggested Cumulative Impact Area (CIA) Mill Road and the Leisure Park all have a significantly higher density of licensed premises per hectare than Cambridge City.

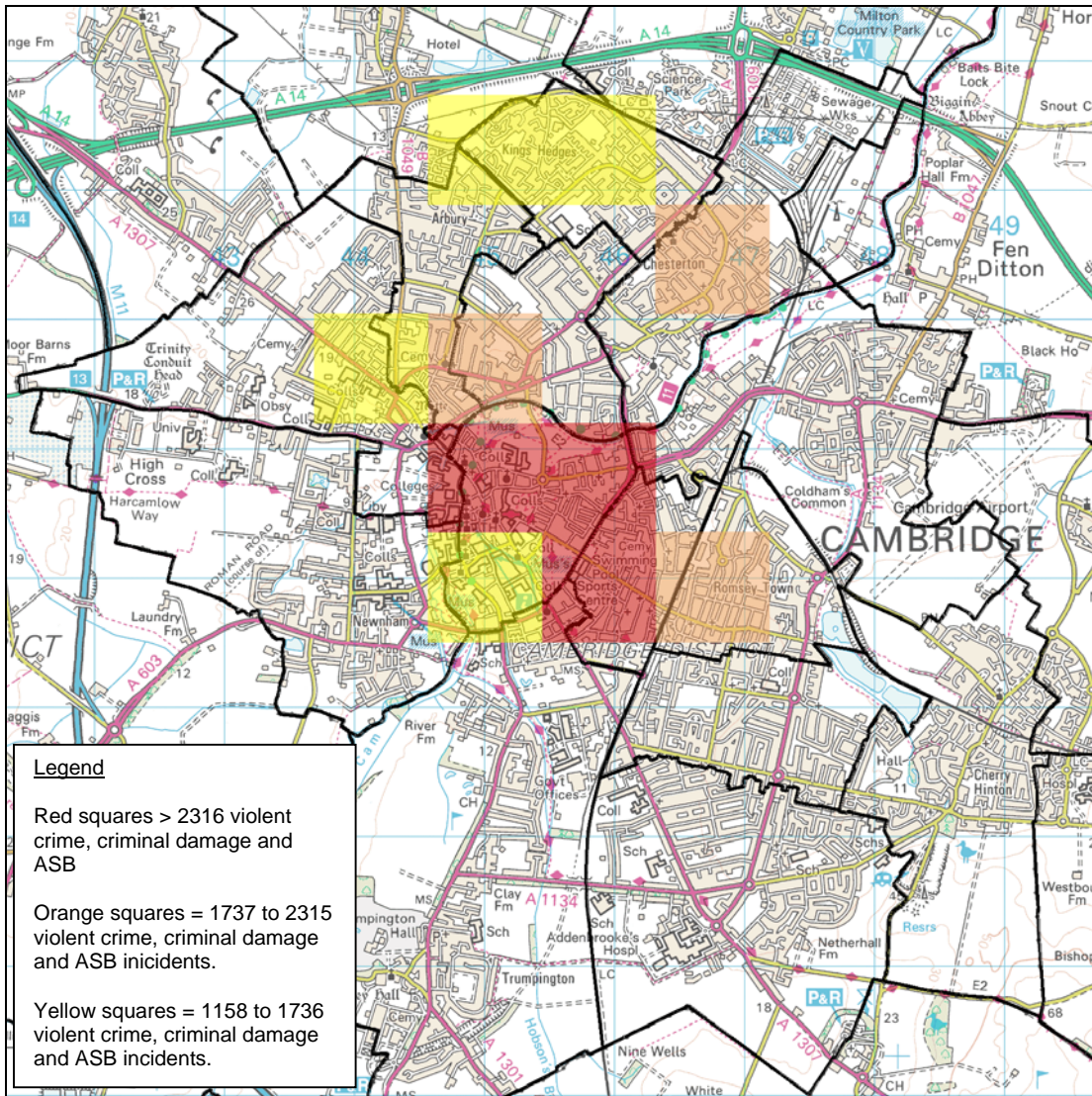
Fig 6. Licensed premises per hectare in Cambridge City 2006/07

Area	Number licensed premises	Size of area (hectares)	Licensed premises per hectare 2006/07
Cambridge City	532	4070	0.1
Market Ward	176	169	1.0
Suggested Cumulative Impact Area (in Market Ward)	153	89	1.7
Mill Road	40	10	4.0
Cambridge Leisure Park	13	3	5.0

2. Violent crime, criminal damage and anti-social behaviour in Cambridge City

The grid analysis below indicates the main hotspot for violent crime, criminal damage and anti-social behaviour offences over the past three years was in Market beat. There is also hotspot over a section of Petersfield beat. This is due to Mill Road (see below for further explanation).

Fig 7 Grid analysis of violent crime, criminal damage and anti-social behaviour in Cambridge City 2004/05 to 2006/07



The table below shows criminal damage, violent crime and ASB data for three years for the identified areas. Key findings from this table are as follows:

- Violent crime and criminal damage offences have generally reduced from 2004/05 to 2005/06 and then slightly increased from 2005/06 to 2006/07 across Cambridge City and areas shown in above table⁸.
- Anti- social behaviour incidents have generally increased year on year since 2004/05.
- The suggested CIA made up 82% of violent crime, criminal damage and anti-social behaviour in 2006/07 in Market ward and 21% of violent crime, criminal damage and anti-social behaviour in 2006/07 in Cambridge City⁹.

⁸ With the exception of violent crime in Cambridge Leisure Park which has increased year on year since 2004/05 and criminal damage in Market ward and suggested Cumulative Impact Area which has decreased year on year since 2004/05.

⁹ Cumulative impact area makes up just 2% of Cambridge City area.

- Mill Road made up 3% of all violent crime, criminal damage and anti-social behaviour in 2006/07 in Cambridge City. In previous analysis Mill Road was identified as the top street for BCS comparator crime, violence against the person, hate crime and ASB and second for criminal damage in Cambridge City¹⁰.
- Cambridge Leisure Park made up 1% of all violent crime, criminal damage and anti-social behaviour in 2006/07 in Cambridge City.
- Assault occasioning actual bodily harm (ABH) was the most common offence type making up 38% of offences in the suggested CIA, Mill Road and Cambridge Leisure Park. ABH, public order offences and common assaults made up 80% of the total violent crime in these areas.

Fig 8 Violent crime, criminal damage and anti-social behaviour in Cambridge City 2004/05 to 2006/07

Area	Offence	2004/05	2005/06	2006/07
Cambridge City	Violent Crime	3114	2302	2471
	Criminal damage	2205	2060	2187
	Anti-social behaviour	7060	7191	9350
		12379	11553	14008
Market ward	Violent Crime	830	616	776
	Criminal damage	369	261	247
	Anti-social behaviour	1554	1570	1939
		2753	2447	2962
Suggested Cumulative Impact Area (in Market Ward)	Violent Crime	642	456	551
	Criminal damage	291	192	186
	Anti-social behaviour	1308	1336	1706
		2241	1984	2443
Mill Road	Violent Crime	76	44	87
	Criminal damage	43	35	35
	Anti-social behaviour	235	211	261
		354	290	383
Cambridge Leisure Park	Violent Crime	27	32	34
	Criminal damage	19	9	13
	Anti-social behaviour	41	58	99
		87	99	146

¹⁰ BCS crime, violence against the person and hate crime measured between 01/06/2006 to 31/05/2007. ASB measured between 01/01/2007 and 20/06/2007.

Although the total number of offences and disorder is relatively low in the Mill Road and Leisure Park these figures become more meaningful when the size of the areas is taken into account.

The table below illustrates that although Cambridge Leisure Park may have less offences than the other areas analysed, it has the highest number of offences and disorder per hectare. The table also illustrates the high offences and disorder per hectare for the suggested CIA and Mill Road.

Fig 9 Violent crime, criminal damage and anti-social behaviour per hectare in Cambridge City 2006/07

Area	Offences and disorder¹¹ 2006/07	Size of area (hectares)	Offences and disorder per hectare 2006/07
Cambridge City	14008	4070	3.4
Market Ward	2962	169	17.5
Cumulative Impact Area (in Market Ward)	2443	89	27.4
Mill Road	383	10	38.3
Cambridge Leisure Park	146	3	48.7

Grid analysis of ambulance pick-up data concerning ambulance callouts involving assaults and overdoses¹² between 01/01/2003 and 05/10/2006 for Cambridge City shows the hotspot areas mirror those for the violent crime, criminal damage and anti-social behaviour incidents for the City i.e. hotspots in Market ward, Petersfield and Mill Road area.

Analysing the number of ambulance pick-ups per hectare as shown below once again illustrates that although the Leisure Park has the smallest absolute number of ambulance pick ups it has over 20 times the number per hectare than Cambridge City as a whole. There are also high numbers of ambulance pick ups per hectare in the suggested CIA and Mill Road.

Fig. 10 Ambulance pick ups per hectare in Cambridge City 01/01/2003 to 05/10/2006

¹¹ Violent crime and criminal damage offences and anti-social behaviour incidents.

¹² Alcohol or drug related.

Area	Number ambulance pick ups	Size of area (hectares)	Number ambulance pick-ups per hectare
Cambridge City	4159	4070	1.0
Cumulative Impact Area (in Market Ward)	996	89	11.2
Mill Road	77	10	7.7
Cambridge Leisure Park	64	3	21.3

3. Alcohol-related offences and disorder

So far in this document it has been shown that those areas with a high density of licensed premises also have a high density of violent crime, criminal damage and anti-social behaviour offences. It is important to establish whether this correlation suggests a causal link between the presence of a high density of licensed premises and high levels of offences and disorder. It is therefore necessary to establish the level of offences and disorder that are alcohol-related.

National research¹³ indicates that a substantial proportion of violence involves people who have been drinking:

- In nearly half (44%) of all violent incidents, victims believed offenders to be under the influence of alcohol. This figure rose to 54% in cases of ‘stranger violence’.
- This figure is likely to be elevated in late-night entertainment districts.

Research from the Eastern Region Public Health Observatory¹⁴ states that levels of alcohol-related hospital admissions and the percentage of binge drinkers is higher in Cambridge City than the average for England¹⁵. The research suggests that this is due to Cambridge being a University city with a high population of young adults. This could potentially make Cambridge City more vulnerable to alcohol-related crime and disorder. Unfortunately there is no accurate marker in Cambridgeshire Constabulary for alcohol-related offences and incidents. The most accurate way we therefore have of establishing a causal link is by looking at the peak times and days of week that offences occurred. It can be inferred that offences and incidents occurring late at night/early hours of the morning are more likely to be alcohol-related - especially those occurring on Friday and Saturday nights.

Another method to establish alcohol-related offences/incidents is to search the notes pages for words that would suggest alcohol use i.e. “drunk”, “alcohol”, “intoxicated” and “drinking”. It must be remembered however that there will be offences/incidents where alcohol was involved but this was not noted in the incident notes and also offences/incidents where the person reporting would not know whether alcohol was involved or not. We would therefore suggest that such measurements of the level of alcohol-related offences would be a minimum and are an under estimate of the true situation.

¹³ Figures taken from the British Crime Survey 2005/2006 from www.homeoffice.gov.uk

¹⁴ Local authority alcohol profiles for the East of England www.erpho.org.uk

¹⁵ Alcohol-related admissions for males standardised rate 826 per 10,000 for England – Cambridge approx 900 per 10,000 (2002-2004). Binge drinking estimates average for England 18.2%, average for Cambridge approx. 21%.

The table below shows the peak time, day of week and minimum % offences and incidents alcohol-related for the areas specified. It can be seen that the proposed Cumulative Impact Area (in Market ward), Mill Road and Cambridge Leisure Park have a significantly higher minimum percentage of alcohol-related offences/incidents than the remainder of Cambridge City. The proposed Cumulative Impact Area in Market ward has the highest percentage of alcohol-related offences/incidents. This is not surprising as this area contains the highest number of licensed premises and is the main late night entertainment district in Cambridge City.

The peak times and days of week for offences/incidents to occur are in line with the hypothesis that a significant proportion are alcohol related as i.e. over the weekend period.

Fig. 11 Peak time and minimum % offences and incidents alcohol-related in Cambridge City 2006/07

Area	Minimum no. and % offences and incidents alcohol-related¹⁶	Peak time for offences and disorder	Peak day for offences and disorder
Cambridge City	18% (2542)	21:00 to 24:00 hrs	Saturday night/early hours Sunday morning
Market Ward	29% (864)	20:00 to 22:00hrs and 00:00 to 03:00hrs	Saturday night/early hours Sunday morning
Cumulative Impact Area (in Market Ward)	33% (2810)	22:00 to 03:00 hrs	Saturday night/early hours Sunday morning
Mill Road	27% (104)	22:00 to 02:00 hrs	Saturday night/early hours Sunday morning
Cambridge Leisure Park	20% (27)	22:00 to 03:00 hrs	Saturday night/early hours Sunday morning

¹⁶ Calculated by searching notes for mention of 'alcohol', 'drinking', drunk' or 'intoxicated'.

4. Conclusion

Areas of high density of licensed premises in Cambridge City are the Cumulative Impact area identified in Market ward, Mill Road and Cambridge Leisure Park. These areas also have a high density of violent crime, criminal damage and anti-social behaviour. It can be shown that a significant proportion of these offences and incidents are likely to be alcohol-related and therefore directly linked to the density of licensed premises.

It is therefore recommended that a Cumulative Impact policy is adopted for the following areas:

- Previously identified area of Market ward
- Mill Road
- Cambridge Leisure Park

Appendix A

Streets in suggested Cumulative Impact Area Market Ward			
Adam and Eve Street	Eden Street	Malcolm Street	Quayside
All Saints Passage	Elm Street	Manor Street	Regent Street
Beaufort Place	Emmanuel Street	Market Hill	Regent Terrace
Belmont Place	Fair Street	Market Passage	Round Church Street
Benet Street	Fitzroy Lane	Market Street	Salmon Lane
Brandon Place	Fitzroy Street	Melbourne Place	Severn Place
Burleigh Place	Free School Lane	Napier Street	Short Street
Burleigh Street	Gonville Place	New Park Street	Sidney Street
Calrendon Street	Grafton Street	New Square	St Andrews Street
Camden Court	Green Street	Newmarket Road	St Johns Road
Causeway Passage	Guildhall Place	Orchard Street	St Marys Street
Christ Church Street	Hobson Street	Paradise Street	St Tibbs Row
Christs Lane	Hobsons Passage	Park Parade	Sun Street
City Road	James Street	Park Street	Sussex Street
Corn Exchange Street	Jesus Lane	Park Terrace	Thompson's Lane
Crispin Place	John Street	Parkside	Trinity Street
Dover Street	King Street	Parsons Court	Warkworth Street
Downing Street	Kings Parade	Peas Hill	Warkworth Terrace
Drummer Street	Lower Park Street	Petty Cury	Wellington Street
Earl Street	Magdalene Street	Portugal Place	Willow Place
East Road	Maids Causeway	Prospect Row	Willow Walk