

## APPENDIX C - REDACTED RESPONSES TO CONSULTATION

**Luke Catchpole**

---

**From:** [REDACTED]  
**Sent:** 16 May 2017 10:49  
**To:** [REDACTED]  
**Subject:** Draft Statement of Licencing Policy

Sir,

A sensible and balanced policy.

My comment is that outside commercial premises selling alcohol, there can be a problem with littering and general mess from discarded cans, food etc. Can a requirement be placed on licence holders to clear up the mess resulting from their business? Events in public areas, eg.

Jesus Green, should be managed by operators that are required to clear up after events rather than relying on the Council to clear up mess.

Regards

--

[REDACTED]

[REDACTED]  
**Subject:** Re: REMINDER: Customer Awareness: Safeguarding, Equality and Protection training - Friday 7th July

Hi [REDACTED]

The course was useful in a number of respects.

It occurs to me, however, that the Council has a large number of licensees and personnel for whose protection (e.g. against theft ('running'), assault etc.) it appears to take no responsibility. Instead, it shrugs this off as a police matter.

This may be so but it could help if a Council Policy were drafted to the effect that the Council will not tolerate theft, assault, abuse etc. against personnel/ licensees and such document were made public.

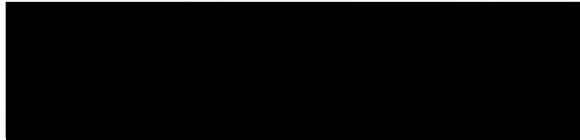
I understand that Officers are unwilling and perhaps unable to deal with such matters but a statement of Council's position in the Press and broadcast in repeat mode every so often may, in a simple way, act as a deterrent, raise licensee morale and help reduce the nonsense which traders have, on a regular basis, to endure,

Best wishes,

[REDACTED]

[REDACTED]

Please reply to:



26 May 2017

Licensing Team  
Environmental Services  
PO Box 700  
Cambridge  
CB1 0JH

Dear Sir or Madam

RE: **Licensing Policy consultation response**

I write in my capacity as Area Commander of Cambridge Police.

I have read the Cambridge City Council Draft Statement of Licensing Policy and am pleased that this makes suitable consideration around the key objectives of Prevention and Detection of Crime and Disorder, Public Safety, Prevention of Public Nuisance and Preventing Children from Harm.

In terms of my specific focus, my feedback surrounds Section 5 of the Draft: The Cumulative Impact of a Concentration of Licensed Premises.

I am pleased that you have used the Police analytical document that shows levels of crime related to Licensed Premises (Appendix 3 in the Draft). It is my view that the Cumulative Impact Policy is both necessary and proportionate to prevent crime, disorder and nuisance, promote public safety and prevent children from harm. Unfortunately, violent crime and alcohol related anti-social behaviour remains a significant issue for both the Police and Local Partners to address. We continue to spend considerable time, effort and resource tackling this. The Special Policy on Concentration of Premises is seen as a vital tool in preventing further escalation of crime and disorder levels.

The only question I would raise is whether it is proportionate to maintain the Zone for the whole length of Mill Road? Whilst our data shows levels of alcohol related crime and disorder incidents of over one a week in Romsey, this is noticeably fewer than the lower end of Mill Road. Whilst there is certainly an issue with alcohol related disorder incidents in the section of Mill Road South of the Railway Line, it is not at the levels seen in other parts of the Zone.

My conclusion is that it is my view that the Special Policy works and should continue to form part of the City Council's Statement of Licensing Policy.

Yours faithfully

Superintendent Jon Hutchinson  
Local Area Commander  
Cambridge City



## ALMR response to Cambridge consultation on licensing policy

The ALMR welcomes the opportunity to respond to the draft licensing policy.

### Who we are

The Association of Licensed Multiple Retailers (ALMR) is the leading organisation representing the eating and drinking out sector across the UK. Our membership includes pubs, restaurants, bars, nightclubs and coffee shops. The ALMR represents over 90% of all managed pubs in the UK as well as leading casual dining chains and world-renowned nightclubs.

Two-thirds of our members are small independent companies operating 50 outlets or fewer under their own branding, but our membership also includes some of the largest high street operators including: JD Wetherspoon, Casual Dining Group and Carluccio's, with well-known branded outlets such as: All Bar One, Slug & Lettuce, TGI Fridays, Wahaca, Wagamama and Harvester.

### The eating and drinking out sector across the UK

Operators in the sector generate £63bn in turnover (an increase of 37% since 2010) and contribute £32bn GVA (+63% since 2010), pay a third of turnover in taxes and invest £4.4bn pa in our high streets and local communities.

The sector supports 1.6m jobs (+18% since 2010), creates 1 in 7 of all new jobs and has grown at 6.5% pa since 2010 (9.3% pa for restaurants).

### Overall approach to licensing

The ALMR believes the Licensing Act works at its best when industry and local authorities work closely together. In addition to the regulatory powers that local authorities have, individual premises, and groups of premises, can contribute to a safer, more enjoyable licensed sector. Dialogue between LAs and licensed premises should therefore be the mechanism to tackle any issues related to alcohol misuse.

This is supplemented in many areas by partnership schemes, where local businesses collaborate to create a more positive environment in local communities. Schemes such as Best Bar None, local pubwatches, Purple Flag schemes, Community Alcohol Partnerships and Business Improvement Districts (BIDs) all demonstrate a proactive approach from business to improving the local area and preventing alcohol misuse.

The Licensing Act allows for the application of conditions, adapted to individual premises. We understand that these have a role to play where there are specific issues but it is important that blanket conditions are not applied. It is also critical that conditions that add extra costs to businesses are carefully considered before they are applied. Conditions should only be used as a last resort, where they are specifically required for an individual property and must be proportionate.

Overall the local authority should recognise the economic and social value that licensed premises can offer and ensure that the licensing policy does not reduce the benefit that the local area gains from this sector. In fact, the local authority should be actively considering how to further the economic interests of local businesses.

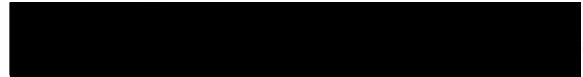


Specific points about the Cambridge licensing policy

Looking at the revised Cambridge licensing policy the ALMR is broadly positive about the approach that the local authority has taken and has some additional points below.

- The cumulative effect policy identified from paragraph 5.8 onwards appears detrimental to the areas affected, deterring investment. We would recommend that this is removed or amended to emphasise a presumption of the granting of new licences unless there are specific reasons not to do so. This will promote a diverse landscape of licensed premises.
- The promotion of the use of conditions only when appropriate to an individual premise is very welcome, as is the recognition that conditions do inevitably impose additional costs (8.1 to 8.4). However, we would caution against the specific identification of CCTV as a condition.
- The focus on integrating strategies, particularly around tourism and the licensed sector, is very important. The appreciation of the night-time economy as a whole, and the cultural diversity that this can deliver, is another positive sign (section 9).
- The decrease in incidents reported in Appendix 3 does not appear to tally with the expected results of a cumulative impact policy which would take a much longer time to deliver results. We would suggest that other factors are more important here and that this should not be used to justify the continuation of the cumulative impact policy.
- The reduction in alcohol-related crime is very welcome and should be celebrated.

Date: 6<sup>th</sup> August 2017





My ref:  
Your ref:

Date: 7<sup>th</sup> August 2017

Contact:  
Telephone:  
E Mail:



Public Health Directorate  
Box no: SCO2213  
Scott House  
5 George Street  
Huntingdon  
Cambridgeshire  
PE29 3AD

## **Re: Statement of Licensing Draft Policy (Cambridge City)**

Thank you for inviting Cambridgeshire County Council to respond to the consultation on the statement of licensing Policy for Cambridge City Council. As you will be aware, since April 2013 Directors of Public Health (DPH) have been included as Responsible Authorities under the Licensing Act 2003. The role of the DPH is to help promote the health and wellbeing of the local populations they serve. Promotion of the licencing objectives, which collectively seek to protect the quality of life for those who live and work in the vicinity of licensed premises and those who socialise in licensed premises is an important contribution to this.

Please find below our comments on the draft policy for your consideration. These comments have been formulated in part, from Public Health England guidance and examples of good practice from elsewhere.

### **Section 5 – The cumulative impact of a concentration of licensed premises (pg5)**

Public Health welcome the City Council's adoption of the Cumulative Impact policy and view this as an effective measure of addressing the potential impact on the health related harms associated with harmful use which can be evidenced in areas that have a high concentration of licensed premises. I

Could consideration be given for inclusion of a statement on all the responsible authorities and perhaps a specific reference to Health becoming a responsible authority. Wording may state, for example:

'County Council Directors of Public Health (DPH) are now responsible authorities with all of the powers and responsibilities this brings. This Licensing Authority acknowledges that the DPH will be useful in providing evidence of alcohol- related health harms when there is a revision of policy particularly in relation to cumulative impact policies or early morning restriction orders. This Licensing Authority envisages that DPH's will also be useful in providing evidence such as alcohol-related A & E admissions or ambulance service data that might be directly relevant to an application under the Act.'

We would welcome further discussion with the licensing team as to how public health could support the use of the cumulative impact policy within Cambridge City Council. We have



recently had some success with representations made against licensing applications within Fenland District Council's Cumulative Impact Zone. This has supported the aims of the policy in regards to reducing the number of licensed premises in a specific geographical area and the potential impact of increased crime, disorder and the negative health impacts associated with these high density areas.

### **Section 7 – Children & Licensed Premises**

Please consider the following additions to Section 7.5

- Where there is a known association with the provision of illicit tobacco and alcohol
- Where the supply of alcohol is in close proximity to services where young vulnerable people may frequent.

Please consider inclusion of further examples of control measures that impact on health and wellbeing that could be included in this section e.g.

- Avoid promotions that target the sales of alcohol at very young people e.g. alcopops

### **Section 9 – Integrating Strategies and the avoidance of duplication (pg. 11)**

The statement of licensing policies will have links to the Health & Wellbeing Board Cambridgeshire Health & Wellbeing Strategy 2012-17 (currently being refreshed) but please consider reference to how health and wellbeing strategies can directly impact and support the council's licensing policy.

### **Section 15 - Responsible Authorities (pg .16)**

Public Health:

The Director of Public Health, C/O Head of Public Health Programmes, Cambridgeshire County Council, Scott House, Box No SCO 2213,5 George Street, Huntingdon. PE29 3AD



Child Protection:

Child Protection Services, Licensing Applications, OCYPS, PO Box 144, St Ives, Cambs, PE27 9AU

Tel: 0345 045 5203

[Referralcentre2.children@cambridgeshire.gov.uk](mailto:Referralcentre2.children@cambridgeshire.gov.uk)

Thank you for taking the time to consider these comments, we look forward to receiving the final document.

Yours sincerely



Head of Public Health Business Programmes