APPENDIX D

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Our ref: JSR ANL MC 10015 827
Your ref:

1 June 2011

Dear Sirs

Jam House, 21 Hobson Street, Cambridge
New Premises Licence

We act on behalf of the Chief Constable of Cambridgeshire Constabulary in respect of the above matter.

Please find enclosed a copy of the Representations on behalf of Cambridgeshire Constabulary in opposition of the Application for a New Premises Licence.

Please do not hesitate to contact the writer should you wish to discuss this matter further.

Yours faithfully

Weightmans LLP

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Enclosure:

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The LICENSING ACT 2003
REPRESENTATION FORM FOR "RESPONSIBLE AUTHORITY"

Please delete as applicable: POLICE

Your name Job title	PC60 Peter Sinclair Licensing Officer, Southern Division
Postal Address (inc post code)	Police Station Parkside Cambridge CB1 1JG
Contact telephone number:	01223 823397
Mobile number	07738348577
Email address	Peter.sinclair@cambs.pnn.police.uk

Name of premises you are making a representation about:	The Jam House
Address of the premises you are making a representation about:	21 Hobson Street Cambridge CB1 1NW

This section is about your representation/s. They must relate to one or more of the Licensing Objectives. Please detail the evidence supporting your representation, (under the relevant headings) and the reasons for your representation/s. *It is important that you detail all matters that you wish to be considered. (Use additional sheets if necessary). Regulations provide that in considering representations the authority may take into account documentary or other information produced by the party either before the hearing or, with the consent of all parties, at the hearing.*

Which licensing objective(s) does your representation relate to?	Please see below
The prevention of crime and disorder See Below	Public safety See below
The prevention of public nuisance See Below	Protection Of Children from Harm N/A

Signed: Date: 1/6/2011

Prevention Of Crime & Disorder/Public Nuisance/Public Safety

This venue is situated in Hobson Street in the very heart of the City. It exits from St. Andrews Street which is one of the busiest through fares in the city and one with a high alcohol related incidents and crime rates. The premises are also situated within the Market Ward Accumulative impact area.

The premises in question is the old Gala Bingo Club the venue closed in 2009 after online Bingo and falling membership lead to its demise. The premises operated a membership scheme due to the fact that it was registered under Part 4 of the then Gaming Act of 1968. This meant that entry was strictly controlled through the membership scheme and the public were not at liberty to walk in to the venue off the streets. It also operated for the purpose of playing bingo and ancillary games and the provision of social activities. The maximum capacity set at the time was 700 when in truth it really achieved this number in recent years and has stated falling membership was a key factor in its closure plus the age profile of the majority of members was well beyond the intended use of this venue.

The City Centre Market area still remains a busy hotspot area in relation to alcohol related crime and disorder. There have been improvements in the area over several years but this is due to the fact that there has been a high level of Police and Partner activity and resources having been put in to the area such as Operation Sodium Patrols, Street Pastors and Taxi Marshalling. There has recently also been the formation of a City centre policing team consisting of a police sergeant, eight constables and six police support officers to deal with issues specific to the city centre. Their responsibilities focus on policing the retail trade issues during the day such as shoplifting, cycle theft and then the night time economy to deal with alcohol related anti social behaviour and crime on a 24/7 basis. Additionally, it is our view that the fact that there is accumulative impact zone and its continued adoption has also contributed. The Police do not want to see any of that good work undermined. This is of particular concern in the current climate of all constabulary measures where we may not be able to maintain the same level of commitment in that way in the future.

The Police are concerned over a number of issues in relation to this Application:

Number 1.
The Applicant has provided in their operating policy, which in our view is fairly standard, provisions we would expect for a large City Centre venue but no specific details to demonstrate how they propose to negate an increase in the negative impact other than adopting a series of generic conditions which would have little, if any, impact upon the actual operation in practice.

Number 2.
The plans show seating and tables for around 240. There is no indication at this stage of overall total capacity when standing, particularly if the furniture can be removed and stored away under the stage. This area could facilitate a large dancing/standing area fed by the bar areas when the sliding screens are pulled back. The proposed number of customers and any potential increase in numbers by creating a club style environment would also likely to have a negative impact in the venue and outside.

Number 3.

If granted it will be an additional draw of people in to the area particularly with the extended drinking hours for sale of alcohol which will increase the likelihood of further problems of disorder occurring in the venue and in this area.

Number 4.
It is inevitable that the door staff will need to react and deal with the increased number of intoxicated persons arriving from other venues and in an intoxicated state attempting to gain entry and problems of crime disorder, nuisance and public safety arising as a result of their entry being refused.

Number 5.
This is already a tight pinch point area within the City, there is a likelihood of more problems occurring when the venue closes at 00.30 hours and the net effect of allowing 240 plus customers, possibly more, exiting the premises on to the streets condensed in to a relatively confined area and in to surrounding passageways could lead to further problems occurring in the street and nearby vicinity adding to a negative impact.

Number 6.
There is the possibility of the premises becoming a 'feeder bar' for other local venues which already operate extended licensing hours with patrons who are "in drink" or "inebriated" attempting to gain entry to those adjacent premises causing confrontation with the staff and door staff adding to the negative impact.

Number 7.
Depending on the numbers of persons exiting the area at a similar time it may also over burden the nearby City Taxi Ranks causing frustration and confrontation again adding to the accumulative impact in this area.

Number 8.
Despite this being in the City Centre there are a number of residential areas in close proximity to the venue where persons will be sleeping. With increased patrons attending the area on foot and in vehicles both coming to, dropping off, picking up and going from the premises and disbursing away from the venue there is a likelihood of disturbance of those residents in close proximity to the venue.

Number 9.
The Police must also consider the effects long term if the Applicant manages to secure a new licence for the venue, future pressure due to market forces could result in this venue morphing in to something entirely different. Experience shows us that it will make it very difficult, over a period of time, to resist such modifications once a licence has been granted.

Number 10.
For the above reasons the Police's view is that the venue providing the sale of alcohol in the area would act as an additional draw to the area and issues will occur at the premises and in the vicinity of the premises. Given that the onus of demonstrating no negative impact falls on the Applicant it is difficult to see how they could ever, in practice, overcome this particular issue in relation to the premises of this type, regardless of the procedures in place and the manner in which the premises are operated and it is LIKELY to add to the existing accumulative impact.

The grant of such a licence would have a negative accumulative impact and would result in adverse consequences for the prevention of crime disorder.

The grant of such a licence would have a negative accumulative impact and would result in adverse consequences for the prevention of public nuisance.

The grant of such a licence would have a negative accumulative impact and would result in adverse consequences for the prevention of public safety.

Furthermore, the Police believe that we would be failing in our obligations under Section 17 of the Crime Disorder Act 1998 as amended when exercising the functions to give due regard to the likely effect of the exercise of those functions on, and the need to do all that they reasonably can to prevent, crime, disorder, anti-social and other behaviour adversely effecting the local environment, including the misuse of drugs, alcohol and other substances in its area.

Evidence adduced in support of such representations may comprise of, although not exclusively, first hand knowledge of Officers involved in policing the area, statistical analyses of crime, disorders and incidents of anti-social behaviour, as well as Police records from the Commanding and Control Logs, Police Crime files, statements and/or CCTV footage.

In regard to the accumulative impact areas the guidance further states:

Effect of Special Policies

13.29. *"The effect of adopting a special policy of this kind is to create a rebuttable presumption at applications for new premises, licence or public premises certificates or variations that are likely to add to existing accumulative impact will normally be refused following relevant representations, unless the applicant can demonstrate in their operating schedule that there will be no next of accumulative impact on one or more of the licensing objectives"*

Conclusion:

Cambridgeshire Constabulary would have no objection to the premises reopening in its former guise as a Club offering the game of bingo to its member. The proposed use would attract an entirely different audience which, the Police are confident, would exacerbate the serious problems that they already experience on a very regular basis in this particular location. For that reason we maintain our objection to the proposal.

Signed: P. Sinclair Date: 1/6/2011

Creating a safer
Cambridgeshire

Licensing Act 2003

Delegation of responsibilities by the Chief Officer of Police

In accordance with the provisions of the Licensing Act 2003 I hereby delegate authority to Divisional Commanders and to Divisional Superintendents to develop policies and procedures and to exercise all powers vested in the Chief Constable of Cambridgeshire Constabulary. Such delegation to include the power to delegate specific tasks to licensing constables and support staff.

This delegation shall remain in force unless otherwise notified.

Signed

Simon Parr
Chief Constable
Cambridgeshire Constabulary

Dated 7/9/10