

Date: 16/06/2025

Our Ref: [REDACTED]

Email: [REDACTED]

Public Health
Box No: ALC2629
New Shire Hall
Enterprise Campus, Emery Crescent
Alconbury Weald

Cambridge City Licensing Authority

By email: licensing@cambridge.gov.uk

Dear Licensing Authority

Licensing Act 2003 – Responsible Authority Representation

Name and address of premises for which the representation is being made:

The C Bar, 112 Mill Road and 1a Devonshire Road, Cambridge.

Cambridgeshire Council as a responsible authority is making a representation on all four licensing objectives:

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

Cambridge City Licensing Authority has published a Cumulative Impact Assessment, dated March 2024. At paragraph 3.1 it states that "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".

Notwithstanding, at paragraph 3.4 it states that "the absence of a Cumulative Impact Assessment does not prevent any responsible authority or other person 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".

At paragraph 4.1, it confirms that the Licensing Authority has published a Cumulative Impact Assessment in relation to specific areas of the City, which includes the entire length of Mill Road, Cambridge (excluding Brookfields).

The premises has its main entrance off Mill Road and subsidiary entrance off Devonshire Road. It is considered therefore that the premises falls within the Mill Road Cumulative Impact Area/Zone (CIZ). Mill Road is located within the Petersfield Ward for Cambridge City. According to Appendix 4 of the Cumulative Impact Assessment, dated March 2024, Petersfield Ward has 79 licensed premises.

Paragraph 4.9 of the Cumulative Impact Assessment document states "An applicant wishing to obtain a new licence or vary a licence for premises, within the cumulative impact area, will be expected to demonstrate through the operating schedule, the steps that they intend to

take so that the Council and responsible authorities can be satisfied that granting a new or varied licence will not add to the cumulative impact already being experienced". Paragraph 4.10 of the same document states "The onus is on the applicant to demonstrate to the responsible authorities the suitability of how their proposal will not add to the cumulative impact".

In our opinion the applicant has not demonstrated under any of the licensing objectives how their establishment will not add to the cumulative impact in the Mill Road CIZ.

The prevention of crime and disorder

This premise sits within a cumulative impact zone. Nationally we are aware:

- 42% of violent offenders are believed to be under the influence of alcohol (source <https://www.gov.uk/government/publications/police-led-alcohol-intervention-checklist-and-toolkit>, published 20 July 2023), rising to 64% in incidents of "stranger" violence (source [Violent Crime and Sexual Offences - Alcohol-Related Violence - Office for National Statistics](#)).
- 40% of secondary school-age children have been involved in some form of violence because of alcohol (source <https://www.gov.uk/government/publications/police-led-alcohol-intervention-checklist-and-toolkit>, published 20 July 2023)
- 39% of sexual assaults are estimated to have taken place when the offender has been under the influence of alcohol, and 39% when the victim has been drinking (source [Alcohol, sexual assault and harassment | Drinkaware](#)).

Locally:

- Alcohol related crimes in the Petersfield Ward, which includes Mill Road, shows that there were 69 incidents recorded between April 2022 and March 2023 (source Appendix 4 of the Cambridge City Cumulative Impact Assessment, dated 2024).

The applicant has submitted an application form and plans of the premises but has not provided any detailed actions in regard to upholding this licensing objective, other than stating that there will be 'strict security'. Public Health consider that the applicant has not provided robust evidence to demonstrate the suitability of their proposal and how it will not add to the cumulative impact already experienced in the area.

Recommendations

- For the applicant to implement a Refusal register.
- For the applicant to implement an incident book.
- Training for staff to be aware and look out for vulnerable people and implement 'Ask Angela' scheme.

Public safety

This premise sits within a cumulative impact zone and we know nationally:

- 42% of violent offenders are believed to be under the influence of alcohol (source <https://www.gov.uk/government/publications/police-led-alcohol-intervention-checklist-and-toolkit>, published 20 July 2023), rising to 64% in incidents of "stranger" violence (source [Violent Crime and Sexual Offences - Alcohol-Related Violence - Office for National Statistics](#)).

Locally

- Alcohol related incidents in the Petersfield Ward, which includes Mill Road, shows that there were 77 incidents recorded between April 2022 and March 2023 (source Appendix 4 of the Cambridge City Cumulative Impact Assessment, dated 2024).

The applicant has submitted an application form and plans of the premises but has not provided any detailed actions about upholding this licensing objective, other than stating that there will be a 'security team in place'. Public Health consider that the applicant has not provided robust evidence to demonstrate the suitability of their proposal and how it will not add to the cumulative impact already experienced in the area.

Recommendations

- For the applicant to consider the use of CCTV in and around the premises.
- Ensuring appropriate limits on the maximum capacity of the premises.
- Ensuring fire safety procedures are in place.
- Ensuring appropriate access for emergency services such as ambulances.
- Ensuring appropriate and frequent waste disposal, particularly of glass bottles and glasses.
- Ensuring the safety of people when leaving the premises e.g. provision of late-night transportation, clear display of taxi firms operating in the area.

The prevention of public nuisance

The public health team is concerned about the impact of alcohol misuse and the public nuisance it causes. Other public nuisance concerns relating to noise pollution, odours and litter, and light pollution can be conditioned and regulated under other legislative regimes.

The applicant, on the submitted form, has not provided any detailed actions about upholding this licensing objective, other than stating that 'with the help of professional security team'. Public Health consider that the applicant has not provided robust evidence to demonstrate the suitability of their proposal and how it will not add to the cumulative impact already experienced in the area.

Recommendations

- The licensee promotes responsible drinking practices and discourages binge drinking e.g. sensible pricing policy.

The protection of children from harm

The applicant has submitted an application form and plans of the premises but has not provided any detailed actions about upholding this licensing objective, other than stating that there will be a 'no one under the age of 18 allowed into the premises without parents.'

It is recognised that the applicant has attempted to address the licensing objective around prevention of children from harm. However, the legal position in regard to the proposals the applicant has put forward is.

- All venues wishing to sell or are selling alcohol will have to be signed up to the Challenge 25 proof of age scheme or similar scheme.

Public Health consider that the applicant has not provided robust evidence to demonstrate the suitability of their proposal and how it will not add to the cumulative impact already experienced in the area.

Recommendations

- That the premises licence holder ensures that there are no specific promotions targeting alcohol products at young people e.g. alco-pops drinks or very cheap alcohol sales.
- Refusal register.
- There will be an unimpeded view of the street from the service counter/ till area as to prevent proxy sales.

Summary

The role of public health is to promote the health and wellbeing of the local populations we serve and has close affiliation with the licensing objectives. The licensing regime is concerned with the promotion of the licensing objectives, which seek to protect the quality of life for those who live and work in the vicinity of licensed premises. We welcome Cambridge City Council's use of a "cumulative impact zone" in Mill Road.

We consider licensing legislation to be an important contributor to reducing harm by restricting availability of alcohol and safeguarding the public, including the young and vulnerable. We therefore as a first option oppose this license application in the Cumulative Impact Assessment area. The opening of an additional Licenced Premise has the potential to make it more challenging to achieve the objectives in this policy. The Cambridge City Cumulative Impact Assessment contains a rebuttal presumption that applications will normally be refused if appropriate representations are made. This Public Health representation argues the The C Bar, 112 Mill Road/1a Devonshire Road, Cambridge lacks material evidence to rebut the CIZ presumption.

Yours sincerely



Dallas Owen (Senior Public Health Manager – Health in All Policies)

**On behalf of,
Sally Cartwright, Director of Public Health**