

Appendix B - Draft Cumulative Impact Assessment - Consultation Responses

Date/Source	Details of Representation	Response	Details of Amendment
<p>26.10.2023</p> <p>Alex Tomlinson, Poppleston Allen solicitors</p>	<p>Thank you for the below information in relation to the consultation on the Cumulative Impact Assessment.</p> <p>We note on the agenda 2.3 f) that Stuttgarter Strasse has been removed from the streets listed within the CIA.</p> <p>However, on the map of the draft CIA under Annex A it has been included within the red line.</p> <p>Could you clarify this matter for us please?</p>	<p>Agree</p>	<p>Stuttgarter Strasse removed from within the red line on the map annexed in the CIA.</p>
<p>20.01.2024</p> <p>Nick Newman, on behalf of the Cardiff Licensees Forum</p>	<p>The Forum committee and I are grateful to have had the opportunity to comment on the CIP Consultation document. My apologies for having let the time slip before responding.</p> <p>Apart from 1 considered response from a committee member (see below) the remainder are generally minded to agree that the CIP should remain in place. (In other times this might have been seen, or referred to as businesses seeking to create a 'closed shop' so as to prevent new competitors coming in to an area). With the caveat (which we think the document covers) to say that applications, or full variations are still considered 'on merit'</p> <p>However, the committee and I agree wholeheartedly that a very negative picture is portrayed of Cardiff's Night Time Economy (NTE) businesses particularly in a) the main Cumulative Impact Assessment Document and b) Appendix F, the policing overview of the NTE in Cardiff. In other settings (for example during Purple Flag assessments and</p>	<p>Comments noted in relation to the forum being in favour of the proposed Cumulative Impact Assessment.</p> <p>The draft Cumulative Impact Assessment (CIA) is a supplementary document to the Council's <u>Statement of Licensing Policy</u> and as such its scope is relatively narrow. A CIA is used to show that the number or density of licensed premises in an area are contributing to problems that undermine the licensing objectives.</p> <p>The draft CIA acknowledges that Cardiff's City Centre has a thriving day and nighttime economy, and that people are drawn to the City Centre for its numerous shops, bars, restaurants and entertainment venues. However, the intention of the document is to consider the negative impact from the number and density of licensed premises in order to justify the continuation of the policy. Whilst there is evidence of a downward trend in ASB incidents and referrals to A&E, there are still a significant number of negative issues attributed to the NTE that officers feel justifies the policy, but</p>	<p>N/A</p>

<p>accreditation visits), both Cardiff Council and SWP are to be found celebrating the partnership processes that go into making Cardiff City Centre one of the safest when compared to other, comparable UK city centre NTEs. However, in this consultation document, little, if any mention is made of the positive impact NTE businesses have on Cardiff specifically (in economic and employment terms) and Cardiff/Wales more generally in the sense that ours is an extremely welcoming and friendly city with a worldwide reputation.</p> <p>This negative view of NTE businesses is often seen across the media when it comes to reporting the sector. One of our committee members often says we're like the awkward relative that never gets invited to family occasions. This despite the fact that in statistical terms (I think I'm right in saying), the number of assaults/hospital visits directly attributable to on-licensed premises are in decline, and have been for some time. (Appendix A. Senior Partnership Analyst, Peter King: "Further analysis has been carried out by the Cardiff University Violence in Society Research Group into the number of patients attending A&E because of an assault. The following charts show weekly violence related attendances at Cardiff University Hospital Accident & Emergency Department it will be noted that since January 2000 there has been a steady decrease in the number of attendees".)</p> <p>In terms of the 'need' for a Cumulative Impact Policy, we are also of the view that the Council, in particular has it in its own gift to reduce alcohol-related street violence by desisting from granting off-licences in the city centre. From the CIP Assessment Document itself it is clear that on-licensed premises (Forum member businesses) can only be</p>	<p>this should not be taken as criticism of individual businesses.</p> <p>In response to the comment that "In terms of the 'need' for a Cumulative Impact Policy, we are also of the view that the Council, in particular has it in its own gift to reduce alcohol-related street violence by desisting from granting off-licences in the city centre". The CIA creates a rebuttable presumption that an application will be refused unless the applicant can successfully demonstrate that the premises will not add to the negative cumulative impact caused by the number and density of premises in the area. Where a CIA doesn't apply, there is a presumption to grant applications unless there is evidence that the application will undermine the licensing objectives, following a relevant representation. The CIA is to provide evidence that may assist an objection.</p> <p>Notwithstanding the above, the comments in relation to the positive impact that licensed premises have on the city centre are noted and will be considered when the overarching Statement of Licensing Policy is next reviewed.</p>	
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said to be referred to in bullet points 4 and 6 (below) and with regard to point 6, as already mentioned from Peter King's report, these instances are on a long-term decline

- Street drinking and associated anti-social behavior
- Crime hot spots as a consequence of late opening fast food premises
- Significant nuisance arising from Litter
- *Noise from licensed premises and on the street*
- An undue number of targeted thefts of personal belongings and sexual assaults being perpetrated against people under the influence of alcohol
- *An undue number of alcohol related injuries through violence or accidents resulting in attendance at the Emergency Unit or Alcohol Treatment Centre.*

Appendix F (p.3) refers to a figure of £8-13billion as a cost to the Police/taxpayer. The OBR estimates duty **alone** on alcohol sales for 2023-24 will be £13 billion. We do not seek to downplay the costs that can be associated with alcohol but our view is that on-licensed premises **in particular** are an entirely positive part of a thriving, internationally-renowned capital city. We are licensed, we are legal, and we are a more than significant employer

To conclude therefore. As a committee, we are in favour of the Cumulative Impact Policy. We are also in favour of more clearly defining anti-social/illegal acts attributed to 'alcohol' in such a way as to draw a distinction between those attributable to 'off-sales' versus those attributable to Forum member businesses (the 'on' trade)