APPENDIX B

Statement of Licensing Policy - Cumulative Impact Area Consultation Comments

Question: Do you agree that the CIAs are sufficient?

Option	Total number of Respondents	Percent of Respondents
Strongly agree	12	29.91%
Agree	14	32.56%
Neither agree nor disagree	2	4.65%
Disagree	5	11.36%
Strongly disagree	6	13.95%
Not applicable	3	6.98%
Not Answered	1	2.33%

Total number of respondents = 43

Who	Position	Comment	Officer response
A licensed business - The Kernel Brewery Ltd	Neither agree or disagree		

Other – a pub company	Not applicable	Cumulative Impact Areas are generally viewed as stifling to investment and can, where applicable to all types of premises, be a detriment to both the day and night time economies. Where such policies exist they should be tailored to the specific premises types that directly cause issues, and in review of such policies local authorities should be encouraged to interrogate the data provided in more detail than just the headline figures with particular focus on how the data has been recorded.	The crime data used to assess the current CIA Policy has been carefully scrutinised by the Members of the Licensing Committee. At present, the Policy does in places, differentiate between different types of premises. For example, in the Camberwell CIA, restaurants (those serving a table meal with alcohol only) are not subject to the Policy.
Cllr Graham Neale Ward: St George's	Strongly disagree	The violence at the Maldona Way *[sic]* arches is abhorrent. Little is being done to address this on-going problem.	The respondent refers to Maldonado Walk in Elephant and Castle. At present the crime data does not support the introduction of a CIA Policy in the Elephant and Castle locality. It should be noted that antisocial behaviour in the street should be reported to the Police.
Member of the Public 1	Strongly disagree	Too much alcohol and noise around in this area *[Elephant and Castle]*, especially throughout summer, day and night	At present the crime data does not support the introduction of a CIA Policy in the Elephant and Castle locality.
Member of the Public 2	Strongly disagree	I strongly feel that Elephant and Castle should be added as a CIA. I live in Draper Estate. As the number of licensed premises has increased, especially in Maldonado Walk, so has the amount of anti-social behaviour and serious crime. In that small enclave (Maldonado Walk) we have had 2 stabbing and one murder in last 18 months. Every week we have anti-social behaviour including fights, shouting, drunkenness and noise. I lived here for 38 years so I am used to noise as elephant and castle is a noisy area. However, these premises do not manage security at all, (hence stabbings and murder) and make virtually no effort in dispersing people quietly. We could not possibly have any further licensed premises here so we need the elephant and castle to be made CIA.	At present the crime data does not support the introduction of a CIA Policy in the Elephant and Castle locality. It should be noted that antisocial behaviour in the street should be reported to the Police. If serious crime is associated to a specific premises, the Police have powers to initiate an expedited review process that could see the premises licence amended or even revoked. Residents also have the ability to initiate reviews of any particular premises licence, should they feel that the licence holder is failing to promote one or more of the four licensing objectives. Please see: https://www.southwark.gov.uk/business/licences/business-premises-licensing/alcohol-late-night-refreshment-and-entertainment-licences/review-of-an-existing-premises-licence

Member of the Public 3	Strongly disagree	I live in elephant and castle overlooking Eagle Yard, where occasional stabbings and regular late night antisocial behaviour, unsupervised children outside late at night, and license breaches are a material issue.	See above.
A licensed business - Hiver	Strongly agree	The three current CIAs are much needed & serve a useful purpose. I personally don't see the need to extend them or add any further ones.	Comment noted.
Member of the Public 4	Strongly agree	Such a policy does have benefits as it draws special attention and scrutiny to applications in densely licensed areas, but Southwark doesn't need any more designated areas as this starts to strangle the growth of small businesses - which surely the Council has a duty to promote. I would even consider getting rid of them completely to encourage going out options for residents as visitors to the borough.	Comment noted. The option to remove all CIA Policies is an option available to the Licensing Committee.
Other	Unanswered	Require better regulation and enforcement - at present public nuisance continues for local residents as the local area (Thames path through Bankside) is super-saturated with licensed premises and subject to noise, litter, public urination, vomiting, etc.	Comment noted.
Member of the Public 5	Strongly agree		
Member of the Public 6	Disagree	We need more areas covered.	Comment noted. All CIAs have been reassessed as part of this consultation process and at this time, there is insufficient evidence to change them.
Member of the Public 7	Agree	I live to the west of Blackfriars road and the CIA has had a very positive impact (apart from the slightly silly name) as we really have a lot of bars and they are too often a disturbance to residents.	Comment noted.

Member of the Public 8	Agree		
Member of the Public 9	Disagree	Borough area is growing so quickly that other areas need to be considered	Please note that there is already a CIA Policy in place across Borough and Bankside.
Member of the Public 10	Disagree	More control and fewer licenses - we are beyond saturation	Comment noted.
Member of the Public 11	Disagree	The number of late night venues serving alcohol has a direct impact on how much a neighbourhood feels safe for residents. Particularly for families and female residents outside at night.	Comment noted.
Member of the Public 12	Agree	Should be sufficient, not sure how to make sure within the current CIA that existing licensed premises be considerate of residential areas for example The Gladstone often has live band acts that are very loud and also customers who spill over in the street drinking outside our residential building and causing noise, particularly in summer.	Comment noted. This consultation is to consider the Borough-wide Statement of Licensing Policy, rather than to deal with complaints regarding specific premises. There is a formal complaint procedure that can be followed for Enforcement Officers to investigate potential breaches. Noise complaints should be made to the Southwark Noise Team as and when they occur to: 0207 525 5777. A premises is not permitted to cause a statutory noise nuisance.
Member of the Public 13	Strongly disagree	The existing CIAs must be retained. In Bankside the high concentration of premises already has a negative impact on residents. I am fearful that the situation will rapidly get worse if the CIA is removed. I think this type of approach should be extended to other areas that have concentrations of licenced premises.	The current CIAs have been reviewed and at this time, there is insufficient evidence to amend or extend the existing boundaries.
Other (resident)	Agree	There are already many licensed premises and I am concerned if new ones are approved. There is already material noise and nuisance - with further concern at number of party boats stopping at Bankside Pier.	Comment noted.
Other (resident)	Strongly agree	There are many licensed premises already, increasing them risks undermining the area as a family tourist area and a residential area.	Comment noted.

Other (resident)	Strongly agree	No more bars or restaurants are necessary. There are plenty to choose from already for all occasions	Comment noted.
Member of the Public 14	Not applicable	I think they should be removed.	The current CIAs have been reviewed and at this time, there is insufficient evidence to amend or extend the existing boundaries.
Member of the Public 15	Strongly agree		
Other (resident)	Disagree	These are needed to curb antisocial behaviour in residential areas.	Comment noted.
Member of the Public 16	Agree	The CIA for Borough and Bankside is an important defence against an indiscriminate increase in the number of licensed premises. This is an important and historic area which attracts many visitors. Without careful oversight and control, the unique atmosphere of the riverside paths and buildings will be lost forever. Too many licensed premises will quickly result in a change to this peaceful and safe community.	Comment noted.
Member of the Public 17	Agree	The pubs around here *[SE1]* have too many people standing outside blocking the pavements, I often can't walk down Weston Street for the amount of people spilling out of The Rose. Pubs should be responsible for having their own area and keeping people off the public highways!	This consultation is to consider the Borough-wide Statement of Licensing Policy, rather than to deal with complaints regarding specific premises. There is a formal complaint procedure that can be followed for Enforcement Officers to investigate potential breaches.
Other (resident)	Strongly agree		
Member of the Public 18	Strongly agree		
Member of the Public 19	Agree	I am a resident of Borough and Bankside and agree that the cumulative impact assessment is important.	Comment noted.
Member of the Public 20	Agree		

Other (resident)	Strongly agree		
Other (resident)	Strongly agree		
Other (resident)	Strongly agree	There are already too many licensed premises on Borough High Street. On a Friday and Saturday night the streets are disgustingly full of rubbish from night time revellers. It's horrible to live on this street which is constantly filthy.	Comment noted, though the area is already under a CIA Policy. Complaints in relation to street cleanliness can be made to the Council's Street Care Team: https://www.southwark.gov.uk/street-care/litter-on-streets-and-estates
Member of the Public 21	Agree	I would not want to see removal of existing CIAs within the Southwark area	Comment noted.
Member of the Public 22	Agree	I would not want the CIA to be removed.	Comment noted.
Member of the Public 23	Strongly disagree	With all the building work and lack of demand for retail and office space there is a risk that landlords/owners will let to licensed premises that can afford the rents but that will disrupt life for people who have made Southwark their home, not their night out.	Comment noted.
Member of the Public 24	Agree		
Member of the Public 25	Strongly agree		
Member of the Public 26	Neither agree nor disagree	I am a resident in SE1 and the current CIA in the Borough Bankside area is essential and must be retained	Comment noted.
Member of the Public 27	Agree		
Member of the Public 28	Agree		

Cllr David Watson Ward: Borough and Bankside	Agree	Borough and Bankside is a vibrant destination for visitors but also home to some 7000 residents. The interests of those living, working and enjoying the area need to be properly balanced and the cumulative impact area helps establish some welcome fundamental parameters. The impacts of late night opening, noise disruption, alcohol abuse and alcohol-fuelled antisocial behaviour are stark for visitors and residents alike. But residents particularly expect the Council and other authorities to take reasonable measures to promote safe, clean and community-oriented public spaces. This means not adding to existing ample, arguably saturated, provisions of licensed premises for the sale of alcohol, late night refreshment, entertainment and activities. All of which contribute to alcohol-related crime and disorder, and of course a more broadly intimidating and rubbish-strewn local environment. The analysis undertaken by the Strategic Director of Environment, Neighbourhoods and Growth of the latest statistics support retention of the existing Borough and Bankside CIA. Borough and Bankside is among the highest wards in Southwark for crime and has a high footfall throughout the week due to hosting the main commercial and tourist area in the borough. As the Licensing committee report notes, higher numbers of alcohol related crime and disorder are therefore more likely. Borough and Bankside experiences notably higher Rowdy Behaviour & Street Drinking ASB calls, Alcohol-related ambulance call-outs and Alcohol flagged violent crime.	Comment noted. All CIAs have been reassessed as part of this consultation process and at this time, there is insufficient evidence to change them.

		I would urge the Council to retain the existing Borough and Bankside CIA.	
Member of the Public 29	Not applicable	All CIAs should be removed, the hospitality industry needs all the help it can get.	Comment noted.

Comments on responses:

- No comments to be actioned.