

**From:** [noreply@southampton.gov.uk](mailto:noreply@southampton.gov.uk)  
**To:** [Licensing Policy](#)  
**Subject:** Licensing Policy  
**Date:** 06 October 2015 12:13:20

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**Customer:** Simon Hill

**Email:** [REDACTED]

**Message:**

I would like to see Portswood district Centre included in the CIP, as there is already a proliferation of cafes and licenced premises and housing nearby with potential disturbance to residents.

**Phone:**

[REDACTED]

**From:** [noreply@southampton.gov.uk](mailto:noreply@southampton.gov.uk)  
**To:** [Licensing Policy](#)  
**Subject:** Licensing Policy  
**Date:** 06 October 2015 17:48:22

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**Customer:** Jerry Gillen

**Email:** [REDACTED]

**Message:**

On behalf of Highfield Residents Association and all local residents, I/we would ask to ask that Portswood is designated a Cumulative Impact Zone. We believe this would assist in controlling the ongoing spread of licensed premises and increased opening hours, all of which are having a detrimental affect on our area. thank you, Jerry Gillen, Vice Chairman

**Phone:**

[REDACTED]

**From:** [noreply@southampton.gov.uk](mailto:noreply@southampton.gov.uk)  
**To:** [Licensing Policy](#)  
**Subject:** Licensing Policy  
**Date:** 07 October 2015 12:46:45

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**Customer:** Councillor Matthew Claisse

**Email:** [REDACTED]

**Message:**

Bearing in mind the increased amount of late night opening in Portswood and increase in licensed premises in close proximity to residential areas, I ask that Portswood is designated as a CIZ. Regards Matthew Claisse

**Phone:**

[REDACTED]

**From:** [noreply@southampton.gov.uk](mailto:noreply@southampton.gov.uk)  
**To:** [Licensing Policy](#)  
**Subject:** Licensing Policy  
**Date:** 15 October 2015 22:52:30

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**Customer:** Christopher Pearce

**Email:** 

**Message:**

Re:Licensing Act 2003 statement of licensing policy My wife and I would like to see Portswood included as a geographic area for the Cumulative Impact Policy in the revised licensing policy effective from 7th January 2016. Although not in the main City Centre zone, there have been an increasing number of applications for licensed premises and variation of opening hours in this area, which is popular with students and young people. There is already significant noise, and anti social behaviour, as well as "no-go" areas, known by the police to be popular with drug users/dealers. We consider that the issue of further licences, or extension/variation of the existing licences without additional controls provided by being in a Cumulative Impact Zone will be detrimental to public safety and the prevention of public nuisance. We hope therefore, that you can include Portswood alongside Above Bar, London Road/Bedford Place and Bevois Valley as a zone in the revised Cumulative Impact Policy. Regards Chris and Bev Pearce



[REDACTED]  
Highfield  
Southampton  
SO17 1NU

15<sup>th</sup> October 2015

Southampton & Eastleigh Licensing Partnership  
PO Box 1767  
Southampton SO18 9LA

Dear Sirs

Re : Licensing Act 2003-Statement of Licensing Policy-January 2016-January 2021

I understand that the four key licensing objectives of 1) prevention of crime; 2) public safety; 3) prevention of public nuisance and 4) the protection of children from harm, are central to the Council's Statement of Licensing Policy.

I support the **Cumulative Impact Policy (CIP)** in certain areas to promote these objectives, and **would ask that Portswood District Centre ( Portswood Broadway) is added to and included in this list of zones, for the following reasons:**

1. Portswood Broadway is a small District Centre( DC) (approx 200-300 m long) surrounded almost entirely by residential areas. Any excessive noise and disturbance in the DC therefore, has a direct impact on residential amenity.
2. There has been a huge increase in licensed premises in the DC in the last two years. The Council's Licensing Map shows that there are now at least 20 licensed premises in the DC( including 2 public houses) plus 2 public houses ( the Richmond and the Gordon Arms) and 3 other licensed premises just outside it, at the southern end. Three of the four pubs close at well after midnight(as late as 1.30am) and one third of the other licensed premises- off-licences, restaurants, take- aways and cafes are open until at least midnight.  
It is now a common sight, to see people drinking in the DC and nearby residential roads.
- 3.The DC is there to serve the needs of the local community.The excessive number of licensed premises and high concentration of them- far denser than in Bevois Valley- is far greater than needed for local residents, and attracts people from outside the area, making it a late night eating and drinking venue. This has resulted in a huge increase in noise and disturbance and anti-social behaviour locally. Any further increase in licensed premises, at the current rate, would make matters much worse .
4. With the advent of several licensed premises south of the DC, there is a very real danger that, without any further restrictions, this would result in a continuous 'drinking corridor' from the DC to Bevois Valley, with attendant problems.
- 5, Portswood Residents Gardens Conservation Area is immediately adjacent to the DC, and already suffers from noise and disturbance from the DC, affecting its quiet amenity. Any further increase would completely undermine its special character , not

preserve or enhance it, and be contrary to the Council's Conservation Area Management Plan.

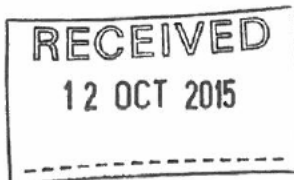
I should be obliged if you would take these comments into account in reviewing the current policy.

Yours faithfully

Mrs J W Jameson

Cc Cllr M. Claisse

Statement of licensing policy 2016-2021 Consultation,  
Licensing,  
Southampton City Council,  
PO Box 1767,  
Southampton, SO18 9LA



[REDACTED]  
Highfield,  
Southampton,  
SO17 1NW

6.10.15

Dear Sirs,

**Ref. Licensing Act 2003 & adoption of Statement of Licensing Policy  
for the period 2016-2021.**

We fully support the continued application of the Cumulative Impact Policy (CIP) to the 3 main zones of Bevois Valley, Bedford Place/London Road and Above Bar.

**We would ask for Portswood District Centre & Portswood High Street to be added also and included in the list of Cumulative Impact Policy (CIP) zones**

for the following reasons :-

(1) The City Council needs to adhere to its accepted licensing objectives, which include the prevention of crime & disorder, upholding public safety and the prevention of public nuisance.

(2) Portswood District Centre is situated within a densely populated residential area, there being little commercial usage other than the retail outlets on either side of Portswood Broadway. The surrounding residential area is consequently particularly vulnerable to excessive noise & disturbance arising from the DC, especially from its night time economy.

(3) There is already a disproportionately high number and concentration of licensed premises in the limited area of the DC - public houses, snack bars, "take-aways" and restaurants. The number of these has increased explosively during the last 2-3 years.

At the present time there are 4 public houses within the 2-300 metre stretch of road that compromises the DC, (3 of the 4 opening after midnight) together with another 4 bars or pubs within a 300 metre radius.

In addition, there are 21 licensed premises, comprising 6 licensed restaurants, 7 off-licenses and 8 licensed snack-bars & "take-aways", a third of which open until after midnight.

(4) The already excessive number and concentration of eating establishments and public houses, detailed above, already greatly exceed the number necessary to satisfy the requirements of the local community, for which the DC is designated. They act as a focus to attract customers from other parts of the city to indulge in late night eating and drinking and their numbers already cause noise, disturbance and anti-social behavior. The continued granting of licences at the present rate will further exacerbate the problems.

(5) Danger of joining up of Portswood DC and Bevois valley.  
The opening of La Baronia Mexica restaurant some 200-300 metres from Portswood DC acts as a bridge with Bevois valley which is a similar distance away. Without restrictions on further licensed premises there is the very great danger of Portswood DC & Bevois valley joining up to form one large and continuous late night rendezvous for eating and drinking with all the associated problems.

(6) Portswood Resients Gardens Conservation Area (PRGCA). Portswood DC abuts immediately onto the PRGCA. The noise & disturbance associated with it, especially at night, adversely affect the amenities of the CA. The DC certainly does not preserve nor enhance the amenities of the CA and as such are at variance with the City Council's accepted Management Plan for the CA

For these reasons we would ask for Portswood DC & Broadway to be added to & included in the list of Cumulative Input Policy (CIP) zones.

Thank you,

Yours sincerely,



For Planning Group,  
Portswood Residents Gardens Conservation Area.

cc. Councillor Matthew Claisse

## **SOUTHAMPTON CITY COUNCIL : LICENSING POLICY STATEMENT CONSULTATION**

### **SUBMISSION BY HIGHFIELD RESIDENTS' ASSOCIATION AND PORTSWOOD CENTRAL RESIDENTS' ASSOCIATION.**

Highfield Residents Association and Portswood Central Residents Association, which together represent the communities on either side of Portswood Road, strongly urge that the Bevois Valley Stress Area under Cumulative Impact Policy 1 be extended to include Portswood Road as far north as the junction with Highfield Avenue and St Denys Road. Alternatively that a new Stress Area covering Portswood Road/Portswood High Street be established.

This area includes a significant number of public houses and other alcohol outlets, as well as take-away and food outlets, many of which have late-night licences.

It is an area heavily frequented by students of the University of Southampton who are disproportionately the victims of criminal acts as well as perpetrators of anti-social behaviour, especially noise related nuisance under the influence of alcohol, to the regular and considerable detriment of the surrounding neighbourhoods. We note references in the Hampshire Constabulary evidence linking offences in the City Centre to the student cycle (e.g. 2 (a) (i) and G.31.B Continuation Sheet no. 2) and would submit that this applies also to Portswood.

In our experience all four licensing objectives, and especially the first three, apply.

We would also urge that the ordering of the sentences in para. 1, Vision Statement, be reversed, to lead with 'To ensure Southampton is a safe and pleasant city to live, work and visit.'

Adrian Vinson

Highfield Residents' Association Committee Member for Planning and Licensing

Portswood Central Residents' Association Committee Member for Planning and Licensing

**From:** [Derrick, Gavin](#)  
**To:** [Bates, Phil](#)  
**Cc:** [Sanders, Mitch](#); [King, Dan](#); [Roberts, Justin](#); [Wicks, Sharman](#)  
**Subject:** RE: Statement of licensing policy  
**Date:** 13 October 2015 14:12:06

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Phil,

As discussed the community safety team are looking to introduce a public spaces protection order (PSPO) in Portswood to control street drinking (and begging).

As part of the preparation work for the PSPO, the neighbourhood police team based at Portswood police station, have provided evidence of the link between the consumption of alcohol by street drinkers and anti-social behaviour in the locality.

The introduction of the PSPO may be complemented by including these parts of Portswood in a cumulative impact area, providing additional control on the number of premises selling alcohol.

Regards

Gavin Derrick  
Regulatory Services (Environmental Health and Community Safety)  
**Southampton City Council**  
Tel: 023 8091 7537  
Mob: 07823 552749

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**From:** Sanders, Mitch  
**Sent:** 13 October 2015 13:33  
**To:** Derrick, Gavin <[Gavin.Derrick@southampton.gov.uk](mailto:Gavin.Derrick@southampton.gov.uk)>; King, Dan <[Dan.King@southampton.gov.uk](mailto:Dan.King@southampton.gov.uk)>  
**Cc:** Bates, Phil <[Phil.Bates@southampton.gov.uk](mailto:Phil.Bates@southampton.gov.uk)>  
**Subject:** FW: Statement of licensing policy

Gavin/Dan, please see the urgent request for evidence below from Phil – can you help?  
Mitch.

Mitch Sanders  
Head of Regulatory & City Services  
Southampton City Council  
023 8083 3613  
[mitch.sanders@southampton.gov.uk](mailto:mitch.sanders@southampton.gov.uk)

**From:** [King, Dan](#)  
**To:** [Bates, Phil](#)  
**Cc:** [Sanders, Mitch](#)  
**Subject:** FW: Statement of licensing policy  
**Date:** 13 October 2015 14:23:24

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Hi Phil,

Mitch has forwarded your e-mail to me. I just wanted to flag with you that we are currently working on the Safe City Strategic Assessment which will look at the impact of alcohol and crime in the city. In addition an alcohol health needs assessment is currently being undertaken by the public health team. Both of these pieces of work should be complete in November and may be helpful for your work. If you would like further details, please let me know.

Kind regards,

Dan King  
Public Health Strategic Analysis Manager  
**Southampton City Council**  
(023) 8083 2493  
E-mail: [dan.king@southampton.gov.uk](mailto:dan.king@southampton.gov.uk)  
NHS secure e-mail: [dan.king@nhs.net](mailto:dan.king@nhs.net)  
GCSX secure e-mail: [dan.king@southampton.gcsx.gov.uk](mailto:dan.king@southampton.gcsx.gov.uk)

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**From:** Sanders, Mitch  
**Sent:** 13 October 2015 13:33  
**To:** Derrick, Gavin <[Gavin.Derrick@southampton.gov.uk](mailto:Gavin.Derrick@southampton.gov.uk)>; King, Dan <[Dan.King@southampton.gov.uk](mailto:Dan.King@southampton.gov.uk)>  
**Cc:** Bates, Phil <[Phil.Bates@southampton.gov.uk](mailto:Phil.Bates@southampton.gov.uk)>  
**Subject:** FW: Statement of licensing policy

Gavin/Dan, please see the urgent request for evidence below from Phil – can you help?  
Mitch.

Mitch Sanders  
Head of Regulatory & City Services  
Southampton City Council  
023 8083 3613  
[mitch.sanders@southampton.gov.uk](mailto:mitch.sanders@southampton.gov.uk)

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**From:** [Wicks, Sharman](#)  
**To:** [Bates, Phil](#)  
**Subject:** RE: Statement of licensing policy  
**Date:** 16 October 2015 08:35:23

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Hi Phil,

[REDACTED]

In relation to the CIP - I don't actually think there will be sufficient evidence to support this in Portswood. We are carrying out a lot of work with a view to supporting a PSPO which will be essentially to address the problem with street drinkers/beggars, however there is not really an issue in relation to the amount of licensed premises in the area, or do they really contribute to the problems we have. I have spoken to the rest of the team for that area and they tend to agree so probably agree that it will need to be put to rest for now as we do not have the evidence to support it.

Kind regards,  
Sharman

Inspector 5582 Sharman Wicks  
Southampton North Neighbourhood Policing Team  
Hampshire Constabulary, Portswood Police Station,  
St Denys Road, Southampton, SO17 2GN  
Internal: 765 4721128  
<http://www.hampshire.police.uk/internet/my-neighbourhood/southampton/southampton-north/>  
<https://mobile.twitter.com/SouthamptonCops>  
<http://intranet/Intranet/DCC/PIMs.htm>

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**From:** Bates, Phil [mailto:[Phil.Bates@southampton.gov.uk](mailto:Phil.Bates@southampton.gov.uk)]  
**Sent:** 13 October 2015 17:45  
**To:** Wicks, Sharman  
**Subject:** RE: Statement of licensing policy

Hi Sharman,

[REDACTED]

No need to deliver all of the evidence now. If there is an indication of a problem then I can advise it is work in progress and we will look to see if there is evidence to support a new CIP area and we can work on this in time. If it is clear there is insufficient evidence then let me know and I can put it to rest now.

Thanks

**Phil Bates**  
Licensing Manager  
Legal and Democratic Services  
Southampton and Eastleigh Licensing Partnership  
Southampton City Council  
phone: 023 8083 3523  
fax: 023 8083 4061  
e-mail: [phil.bates@southampton.gov.uk](mailto:phil.bates@southampton.gov.uk)  
web: [www.southampton.gov.uk/licensing](http://www.southampton.gov.uk/licensing) and [licensing.eastleigh.gov.uk](http://licensing.eastleigh.gov.uk)  
post: Licensing - Southampton City Council  
PO Box 1767, Southampton. SO18 9LA

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**From:** Fulton, James



**Bates, Phil**

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**From:** [REDACTED]  
**Sent:** 23 September 2015 13:37  
**To:** Licensing Policy  
**Subject:** Statement of Licensing Policy.

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From : Lorraine Barter [REDACTED] Polygon Southampton SO15 2FY

#### COMMENTS

#### PARAGRAPH :

3.9

There are far more students than quoted, I would say more than 45,000 and most live in houses close to the Night Time Economy hubs, therefore the rest of the residents there have to cope with house noise as well as street noise.

There needs to be special control polices for bars near to or next to student ghettos.

3.16 and 3.17

Disgraceful situation is ongoing and surley proves that too many alcohol venues allowed in the past ?.

4.6

How can more alcohol venues and premises possibly benefit the community ?

Utter nonsense. It only benefits the Council through business tax ?

4.8

A vocal minority--- this group or person/persons is likely to be the brave citizen or citizens remaining in the Night time Economy areas, Council obviously will not receive many objection letters from people so exhausted by 25 years or more sleep deprivation and stress that they do not even have the strength to write their own names and addresses.

Such people and their voices need to be taken seriously as those on the Licensing Panel do not know what it is like to live close to bars and clubs, as well as being in a student ghetto. The two things combined are unbearable.

5.5

Do not allow late night uses at the Cultural Quarter, consider the flat householders there.

5.7

How do we know that there are or will be any extra police on the streets paid for by the Levy ?

Where can we find the evidence ? Will it make any difference ?

5.12 If there are or have been various schemes why then are things still so bad ?

Are the schemes quite useless ? It would seem so.

5.16 Far too many off licences have been allowed, must be no more in Shirley , this is a drinking hot spot and will become more dangerous.

5.17 Complete nonsense- an earlier terminal hour at off licences near to Night Time Economy areas will be useless, the customers will buy their drinks hours or days in advance and store them at home/buy from big supermarkets in the city centre.

5.18 TENS- they should not be allowed at all near to venues close to flats/houses- Carlton Place, Bedford Place, Upper and Lower Banister Street, even London Road is becoming heavily residential.

6.14

TAKE AWAYS Litter bins do not solve the problem, take away food is still being consumed as far away as my road and Carlton Road, Archers Road and Commercial Road.

7.28 Licensed Premises - Planning Controls - What controls ?

There are no numerical controls- planning officers /Panel will say the market must find its own level and applications are judged on their merits, - even when obviously the proposed venue has no merits.

Regarding the consultation being open to residents , I feel that few will plough through it and in the areas alongside closely packed pubs, bars and clubs no residents associations survive, the committees and most members have fled and incomers see no point in replacing them , speaking up against bar owners and solicitors/barristers with years of experience of getting their own way.

In fact it is ironic that the worse the night time situation is the fewer objections there will be, for the reasons described above.

No matter how robust the policy, the Southampton situation is still going to be an absolute disgrace.

I feel sorry for the Council if Government legislation prevents them from making refusals to more drinking establishments and I feel even more sorry for the city dwellers who have to cope with it.

I may add more thoughts as they come to me before the end of the consultation period.

Thanking you

Lorraine Barter

**From:** [Stewart Morris](#)  
**To:** [Licensing Policy](#)  
**Subject:** Fw: STATEMENT OF LICENSING POLICY  
**Date:** 20 September 2015 16:44:18

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From : Mr Stewart Morris [REDACTED] Polygon Southampton SO15 2FY

COMMENTS :

Paragraph

3.5 Seven new restaurants and cafes, make sure they do not become noisy bars.

3.9 There are more students than quoted, in fact I would say more than 45,000 and most live in houses close to the NTE hubs.

Hence so much street noise and drunken mayhem at night.

3.16 and 3.17 Disgraceful situation and proves that too many alcohol venues allowed in the past.

4.6 How can more alcohol venues and premises possibly benefit the community ?

Ridiculous.

4.8 A vocal minority--- this faction is quite likely to be the brave citizens remaining in the NTE areas, you cannot expect to get

many objection letters from people so exhausted by 25 years sleep deprivation that they do not even have the strength to write their own names.

These people and their voices indeed to be taken seriously.

5.5 Do not allow late night uses at the Cultural Quarter, consider the flat dwellers there.

5.7 How do we know that there are any extra police on the streets paid for by the Levy ?  
Where can we find the evidence ?

5.12 If there are or have been various schemes why are things still so bad ? Are the schemes useless ? It would seem so.

5.16 Too many off licences have been allowed, no more in Shirley please, this is a drinking hot spot and will become dangerous.

5.17 Such nonsense- an earlier terminal hour at off licences near to NTE areas will be useless, the customers could buy their drinks hours in advance

and store them at home/buy from big supermarkets a mile or more away.

5.18 TENS- they should not be allowed at all near to venues close to flats/houses- Carlton Place, Bedford Place, Upper and Lower Banister Street, even London Road is becoming heavily residential.

6.14

TAKE AWAYS Litter bins do not solve the problem, take away food is still being consumed as far away as my road and even Archers Road.

7.18 Cultural Quarter - judged in its merits- there are no merits to drinking hole near to flats.

7.28 Licensed Premises - Planning Controls - there are no controls- planning officers /Panel could say the market must find its own level and applications judged on their merits, - even when clearly the proposed venue has no merits.

Furthermore, no matter how robust or well versed the policy is, it will not protect citizens from harm if the Panel decide to believe the applicants/their representatives rather than the long suffering residents who have first hand experience of the horrific NTE use affects.

**From:** [Dave Griffiths](#)  
**To:** [Licensing Policy](#)  
**Subject:** Statement of Licensing Policy  
**Date:** 20 September 2015 16:24:23

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Dear Sirs

I would like to make a submission to the above policy.

In general I have no problem with the sale of alcohol from licensed premises. What I do not think is right that you can have a concentration of so many in one area.

One of the down sides which we do see in the ward of Freemantle is the number of people from the Baltic region who have a tradition of drinking on the streets. They think that we have the same tradition over here in England, going back the sale of alcohol was strictly regulated, especially after and during the First World War, and again during the Second World War when they did not want people working in the ammunitions industries going back to work, either slightly drunk or drunk. Hence the licencing laws that were introduced.

The people from Baltic region drink on the street here, do not take their empty bottles or empty cans of larger home they just leave them on the street, or like in the raised bedding that belongs the guest house on the corner of Stafford Road, and Howard Road, they leave them in bedding. Which in turn makes the area look untidy, and encourages other drinkers to do the same.

The other gathering spot is the back of dance school on Shirley Road, at the back of this building is a car park which I would think is for the people who are using the dance school. People are gathering round their drinking and again leaving the empty bottles and cans there, for someone else to clear up.

I know of people who live in the bottom half of Stafford Road, whose gardens back directly on to the car park, have complained that this is causing a problem for them. There is a small cut way that goes down between two of the houses and in the summer one of the residents could not sit out in their garden due to the fact that the people were drinking in the car park and it was unpleasant for the householder.

It seems that it is natural way for a newsagent, now to apply for a liquor licence, without going out and actually looking just around Foyes corner there are probably 4 or 6 premises that have licences to sell alcohol, which does not help things generally, and all these outlets are within a matter of 500yds round circle.

This is what I think, hopefully it is something for officers, councillors to think about going forward.

Kind Regards

Dave Griffiths



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## CAMRA, Southern Hampshire Branch

### Comments upon Southampton City draft statement of licensing policy

15/10/2015

In general terms the local branch of The Campaign for Real Ale (CAMRA) supports the aims and objectives of the city's licensing policy but with the following specific points of emphasis and difference.

#### Section 3.18

The extensive table of health statistics in section 3.18 is confusing (and somewhat pointless) as it has no details of the basis of the statistical metrics – for example the concentration of major hospital facilities in city rather than rural areas. Whilst the general point is probably worth making a comparison with other *cities* of similar size would be much more useful.

#### Section 5 PSPOs

Whilst supporting the intentions of the city-wide PSPO, CAMRA does not believe that a blanket ban on all outside drinking is either sensible or feasible. The prevention of modest outside drinking at all normal (ie not 'late hours') pubs is draconian, some flexibility should be introduced – as hinted at in 6.18.

#### Section 6.6 Door Supervisors

It might be worth noting in 6.6 that door supervisors can, in some circumstances, also have negative effect by increasing a public sense of tension and stress. A street in which every door has a pair of uniformed attendants can have a very unsettling effect.

#### Section 7.9 CIP2

CAMRA believes it is invidious to suggest that refusal be the presumption. The pressure of a CIP is (in the case of Southampton certainly) because of the overabundance of premises that are, in general, 'vertical drinking' establishments concentrating on young, often inexperienced, drinkers. The introduction of beer-centred real ale houses into a CIP may well **moderate** the stress even though it increases the licence count.

#### Section 7.19-7.20 CIP3

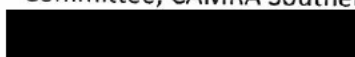
The comments in the paragraph above should reflect into CIP3 in particular into 7.20 which we consider to be quite counter-productive. The points listed are almost exactly those that are of crucial importance in considering applications in the special circumstances of CIP areas.

#### CIPs generally

The whole of section 7 on the five impact policies is very confusing to the average reader and nowhere point specifically to any policies to ameliorate the impacts. We believe that avoiding concentrations of near-identical establishments is the key and the moderating effect of, generally small, cask ale pubs can help with this.

Pat O'Neill

Committee, CAMRA Southern Hampshire



## **Councillor Andrew Pope Response to Draft Statement of Licensing Policy - 16<sup>th</sup> October 2015**

I served on the licensing committee for two years from 2013-2015, and am experienced working in bars in a hotel and at very busy, pressured music festivals. I am therefore aware of the challenges facing licensed venues, as well as the licensing responsibilities they are expected to exercise. Having written and consulted widely on local government policy and manifestoes, I am also experienced at policy research and analysis, although not specifically in the licensing area.

1.1 It is welcome that there is a vision statement, as this is an addition to the current Licensing Policy Statement. What measures of performance will be put in place, and how will they be evaluated? For example, is there a “diverse range” of “well-managed premises”? Will there be active action by the Council to encourage best practise, and reward it, or will it purely be the lack of negatives against the licensing objectives? Or a bit of both?

Best practise could include, for example, “well-managed premises” like we have with Employment and Skills Plans in Section 106 agreements: encouraging stability of employment and training, full-time and part-time contracts, the lack of zero-hours contracts, and the payment of the Living Wage (as set by the Living Wage Foundation) rather than the minimum wage/national living wage. All of these policies would encourage well-managed premises. The Best Practise Scheme suggested below under Late Night Levy and Cultural Quarter could be used to evaluate premises under this vision, and provide hard data on whether the vision is being met over the next five years. If it is not permissible to issue licensing conditions to this effect, the best practise scheme could leverage local trade associations to limit the need for regulation, and therefore reduce costs to the Council.

2.7 Will ward councillors and others be added to this list?

3.5 To be clear, the Cultural Quarter will include many licensed premises, including in an area affected by the Cumulative Impact Policy. It is important to be clear about this, for further concerns I will raise later.

3.7 It should be made clear that any list of “VIP Projects” does not exempt them from the licensing objectives. The licensed premises in any VIP Project should be treated as per the licensing objectives, with evidence and reasoning. It will become clearer later on in my response why I have raised this.

3.16-3.18 – “The Impact of Alcohol on Southampton”

It would be more appropriate to compare Southampton with other cities in England, rather than the England average, which would include places in the countryside that have very different demographics and therefore statistics. Even better, it would be useful to compare Southampton with cities with similar size and demographics, as is done in other parts of the Council, and in other sociological work (e.g. Portsmouth, Plymouth).

4.4, 4.6, 4.8, 4.11 Especially agreed and good.

4.13 Could the times be made clearer for different types?

5.1-5.3 Have these PSPOs worked? I still see a lot of street drinking, e.g. in Shirley Road and Shirley High Street. If not, perhaps a different approach is needed, or there is a need to improve enforcement.



5.4-5.6 Cultural Quarter – As per 3.7, there are licensed premises in the Cultural Quarter. One has already opened - Nando's – is this exempt from the CIP? (it appears that the policy allows this). If so, why? It is no different to other venues, and is particularly worrying if the only reason is some form of snobbery that the Cultural Quarter allegedly attracts a “better quality of clientele”, as is sometimes claimed at the Licensing Committee by in a license review. A licensed premise is no different in the Quarter, and can still attract crime, as sadly and horrifically demonstrated by the Turtle Bay acid attack. Reasoning and evidence needs to be stated for why the Cultural Quarter should be exempt, or it should not be exempt from the CIP.

To clarify further my point under Vision, the Council to have a Best Practise Scheme, with awards for the best premises, where there is a particularly low level, or zero, transgression of the licensing objectives. This would attract customers who want to know they are safer there. The local trade associations could help with this, including with funding – thereby reducing costs through avoiding regulation and unnecessary work for the Council.

For example, there is ample evidence (e.g. via the Campaign for Real Ale) to show that pubs that are “ale houses” attract much lower levels of problems than themed bars or chains that encourage excessive drinking. The same goes for community pubs, if run properly. Perhaps if a pub is listed as an Asset of Community Value by the Council, it could be rated more favourably as a more responsible and valuable licensed premises, than poorly-run premises? Similarly, this applies to other well-run community pubs, as submitted by CAMRA in response to the Police Reform and Social Responsibility Bill -

<http://www.publications.parliament.uk/pa/cm201011/cmpublic/pollicereform/memo/pr26.htm>

Again, if there are to be any exemptions, or favourable treatment, these must be based on reasoning and evidence, as most of this Licensing Policy already does.

5.7-5.8 Late night levy – Reasons and evidence need to be stated as to why these exemptions are in place.

5.9 A Best Practice Scheme is suggested here – so this should apply to the Cultural Quarter and elsewhere too. The Council needs to be encouraging responsible licensing and innovation. Then we will know that the Vision at 1.1 is being satisfied, with hard data.

5.12-13 It appears that spending of the LNL is only for the City Centre. What about elsewhere in the City? The Police evidence in Appendix B shows that 26.44% of Soton district Total Violence is in the West Sector, compared to 34.8% in Southampton Central sector, so why isn't a proportion of the LNL directed to the West Sector? Redirecting the LNL resources to the West sector would help avoid the redirection away from the West sector due to the problems of the Night-Time Economy, which would be away of from where Police resources and patrols are needed. Isn't this what the LNL is for?

5.17 Shops Selling Alcohol (Off Licences) Has the street drinking “one can” policy worked? It appears not from what I have observed, e.g. in Shirley. Perhaps another approach is needed?

6.13-6.14 I fully support placing the responsibility of litter on takeaways, as I have had comments from operators that “it isn't my fault if people drop litter” – despite them selling them the litter! Some takeaways are doing litter picks – others are doing nothing. This needs to be extended to all retailers causing litter, including betting shops. How can this be achieved? EP Act and/or licensing?



## 7 Cumulative Impact Policy

In general, this policy is very difficult to understand, which makes it harder for councillors on the Licensing Committee, and officers, to implement and to evaluate whether it has been a success. This is not just my view, but the view of experienced license holders, bar staff and pub-goers. (e.g. I consulted the local branch of the Campaign for Real Ale).

That is, the CIP is needed as proved by the Police Evidence in Appendix B to the Policy, but the CIP policy overall could be more succinct and be clearer. For example, at the heading of each policy, its purpose should be in the heading, e.g. Policy CIP 1 – Identify the Areas, Policy CIP 2 – Basic Operation of the Policy, and so on. In addition the body of the policies are very confusing, especially CIP 2, CIP 3 and CIP 5. CIP 4 and CIP 5 seem to be a bit confused with each other, and need to be made clearer what each is for and how it relates to the other CIP policies.

7.5 I agree that stricter controls should be put in place where there is denser residential accommodation. However, what if accommodation becomes denser over time (e.g. if an area is seen to be “cool” to live in)? Is this the fault of the licensed premises that have been operating without problems for years, or the fault of development with a lack of planning controls and negotiations before a planning application? A balance needs to be struck to ensure that developers during planning are forced by planning conditions and environmental health to install better sound-proofing and other design methods to ensure the licensed premises and residences can co-exist. That is how to manage the night-time economy so that it is vibrant for those who want to live in it, and quiet enough for those who do not want to have to put up with noise nuisance. A discussion from the Publican’s Morning Advertiser is at: <http://www.morningadvertiser.co.uk/Legal/Licensing-law/How-to-deal-with-your-nuisance-neighbours> .

### Policy CIP 1 – Identify the Areas

Agreed – there is definitely a problem in these three areas. Please see my comments below objecting to any Exemptions within Above Bar (7.16-7.18).

### Policy CIP 2 – Basic Operation of the Policy

7.9 Agreed, but please see my comments below on exemptions (7.16-7.18).

7.11 is where the policy becomes confusing. What if there are a lot of TENs for the same premises?

7.12 If the presumption is of refusal, then surely there should be a greater effort of consultation with Responsible Authorities and Interested Parties, even if it is a notification of the intention to grant the license, pending comments?

7.13 Sorry, but this is not clear at all, but I can see the need for businesses to want a Provisional Statement. For example, does this mean that the presumption of refusal does not apply? It is not clear.

7.14 Agree wholeheartedly that the areas are subject to review, but isn’t this the job of planning and licensing and the Police to ensure that there is not such a concentration elsewhere? It may occur that the CIP might be able to be removed, over time – should this be included in this para?

7.15 Agree wholeheartedly, but again, the City and the authorities want to avoid such concentrations, surely?

7.16-7.18 Exemptions - I refer you to my comments about the Cultural Quarter, which lies in a CIP area. It is adding to an area that is already a problem, but seems to be exempt from the CIP Stress Area (para 7.16) – unless the wording is misleading? If it is to be exempt, I strongly object to this, as there is no reasoning given other than what is stated in 7.18 (used for an arts or cultural purpose as an exception to the CIP). If a licensed premise is associated with “arts” or “culture”, what is the reasoning for this statement in the policy? Reasons are given throughout the Policy, but not in the Exemptions section. If I have understood this properly, what evidence is there to support this policy? The horrific acid attack at Turtle Bay, within the Cultural Quarter, is an example of this policy seeming to be based on nothing but snobbery. Licensed premises within the Cultural Quarter **must not** be exempt, and I ask for sections 7.16-7.18 to be removed from the Licensing Policy.

Policy CIP 3 – How Hearings Deal with Applications Within Stress Areas

7.19 The last sentence is deeply confusing, and I refer you to my comments in CIP 2, especially 7.12.

7.20 There appears to be no reason for this. Surely at least some of these are important considerations and reasonable considerations in not adding to the cumulative impact?

Policy CIP 4 – How Evidence of Cumulative Impact is Dealt With Outside of a Stress Area

7.21 – 7.22 Fully agree that this should be based on evidence – all the more reason to provide evidence and reasoning for the proposed Exemption in 7.16-7.18. At present the exemption is based on assumptions, not evidence or reasoning.

Policy CIP 5 – How Hearings Apply the CIP to Applications From Within or Outside a Stress Area

Couldn't this just be “How Hearings Apply the CIP to Applications”? And how does it relate, or not to CIP 4?

7.23-7.29 Sorry, but I cannot make head nor tail of this, so I would worry about whether councillors and officers could, during a pressured hearing. For example, why the two sections “Representations in Respect...” and Policy CIP 5 – why is this separate from CIP 4?

8 Children

8.3 I agree that suitable child protection bodies should be consulted, but why would those listed have any record of issues relating to licensing? Have those listed ever provided representations? Should others be consulted too?

8.14 Should methods like test purchasing be mentioned here? Or is that described elsewhere?

Thanks for listening to my suggestions, comments and questions. I look forward to the debate.

**Councillor Andrew Pope**

**16<sup>th</sup> October 2015**



Local Safeguarding Children Board  
Civic Centre  
Southampton  
SO14 7LY

Tuesday, 20 October 2015

Dear Mr Bates,

**RE FORMAL RESPONSE TO THE LICENSING POLICY REVIEW  
DESIGNATION OF THE LSCB AS A RESPONSIBLE BODY UNDER S13(4)(F) LICENSING ACT  
2003**

I am writing in response to the formal consultation on the Licensing Policy Review and in particular the designation of the LSCB as a "responsible body" for the purposes considering applications for licensed premises in relation to the safeguarding of children within the city.

As you know, there has been ongoing discussion between us about this for some time.

I have considered the matter with the members of the Board and the Board's Legal Advisor. My view is that the LSCB is not best placed to consider such applications and will struggle to do so in any event within the statutory time frames.

It may assist if I explain the purpose and functioning of the Southampton's LSCB.

The LSCB is an independent body from the Council and of which I am the appointed Chairperson. It is made up of senior representatives from the various agencies within the city which have responsibilities for children's safeguarding and includes amongst many others, the Police, the Health Service (including the Integrated Commissioning Unit), Probation Services, the Voluntary Sector and Housing Services. It has an appointed Board Manager who is responsible for the co-ordination of the meetings and for ensuring that reports and requested research is undertaken in a proper and timely fashion.

The majority of the Board's work is strategic and not case specific. It is not directly concerned with the day to day activities of the Council or its partner agencies. Instead, the Board is responsible for developing local safeguarding policy and procedure and scrutinising local arrangements in place; ensuring effective communication of agreed policies to safeguard and protect children; raising awareness, monitoring and evaluating the effectiveness of the authority and its Board partners; planning services for children in the area; and undertaking serious case reviews as appropriate.

The work is undertaken by Board itself, its Executive Board and 4 sub-committees which in turn report to the Board. The Board meets on a bi-monthly cycle as do the Executive Board and the sub-committees.

The LSCB reports to the Department of Education.

The LSCB does not undertake operational matters, with the exception of serious case reviews when a child has died or has suffered serious harm and neglect or abuse is known or suspected.

The consideration of individual applications for premises licences or personal licences and the variations of existing licenses form part of the day to day operational matters for which the Board is ill equipped to undertake for the reasons given above.

I appreciate that the consideration of the applications is an important function in the safeguarding of children in the city and I have spoken to the Head of Children's Services, Hilary Brookes, about how best to carry it out.

It has been provisionally agreed between myself and Hilary that this work is best undertaken by Children's Services itself, with a nominated team or individual being allocated the work by the Head of Service.

I would therefore propose that the Licensing Policy is amended to reflect the above suggestion that Children's Services, Southampton City Council be designated the responsible authority for children's safeguarding under the 2003 Act, with the Head of Service allocating such applications to a nominated team or individual within the service for a response to you.

I would be grateful if you would please acknowledge receipt of this letter and I confirm that I am happy to discuss the matter further with you, should you wish. Please can you keep me informed of developments.

Yours sincerely



Keith Makin  
Independent Chair of Local Safeguarding Children Board

Cc Hilary Brookes Head of Children's Services.

Policy every 5 years and ours is due for renewal, part of the process is to put the proposed document out to consultation. This is what I am doing now. There is no obligation for anyone to reply but they may want to see how we propose to deal with licensable activity in the coming years as there is some cross over in our fields.

Many thanks

**Phil Bates**

Licensing Manager

Legal and Democratic Services

Southampton and Eastleigh Licensing Partnership

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