

Date of meeting:	30 January 2023
Title of Report:	<b>Cumulative Impact Policy</b>
Lead Member:	Councillor Pat Patel (Cabinet Member for Customer Services, Culture, Leisure & Sport)
Lead Strategic Director:	Ruth Harrell (Director of Public Health)
Author:	Rachael Hind
Contact Email:	<a href="mailto:Rachael.hind@plymouth.gov.uk">Rachael.hind@plymouth.gov.uk</a>
Your Reference:	RH/CIP2022
Key Decision:	No
Confidentiality:	Part I - Official

### **Purpose of Report**

Cumulative Impact Assessments (CIA) were introduced formally in the 2003 Act by the Policing and Crime Act 2017, with effect from 6 April 2018. After publishing a CIA the licensing authority must, within three years, consider whether it remains of the opinion set out in the assessment as detailed in the section 182 guidance.

The five current cumulative impact areas and the additional city centre CIA, along with the Police and Public Nuisance evidence were consulted on for twelve weeks between Friday 11 March 2022 and Friday 3 June 2022. This report contains details of the consultation responses and the cumulative impact areas proposed to be adopted.

### **Recommendations and Reasons**

It is recommended that:

1. The Council adopts and publishes the Cumulative Impact Assessment as contained in Appendix C with effect from 31 January 2023.

### **Reason**

Positive responses were received for the consultation of the Cumulative Impact Assessment and this now needs to be updated to include the additional City Centre Cumulative Impact Area, to reflect the current needs of the City.

### **Alternative options considered and rejected**

Recommend to the City Council that the CIA is determined to be no longer needed however this is not supported by the evidence collected in response to the consultation.

### **Relevance to the Corporate Plan and/or the Plymouth Plan**

The relationship to the Corporate Plan (and Plymouth Plan) –

**Unlocking the City's Potential:** The Licensing Policy and Cumulative Impact Assessment assists with the delivery of a safer, more vibrant Plymouth. This in turn should attract more visitors to the

City and also support an increase in the numbers of citizens of Plymouth who will utilise the social, cultural and sporting offers available. Opportunities for increased levels of employment should follow. A safe and vibrant leisure economy will allow Plymouth to be positively marketed attractive destination both nationally and internationally.

**Caring for People and Communities:** The policy will allow for effective control of alcohol supply, which will assist in reducing alcohol harm and thereby reduce inequality. Whilst alcohol misuse affects individuals from all sections of society, those from the most disadvantaged communities experience the highest burden of harm.

### **Implications for the Medium Term Financial Plan and Resource Implications:**

None

Government has set fees at a level that they believe will achieve full recovery of the administrative, inspection and enforcement costs falling on the Licensing Authority associated with their licensing functions under the Licensing Act 2003. The review of the Cumulative Impact Areas is a core part of the licensing function and there are no future financial implications.

### **Financial Risks**

None – as above.

### **Carbon Footprint (Environmental) Implications:**

None

### **Other Implications: e.g. Health and Safety, Risk Management, Child Poverty:**

*\* When considering these proposals members have a responsibility to ensure they give due regard to the Council's duty to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equalities Act and those who do not.*

Members should be aware that Section 17 of the Crime and Disorder Act 1998 puts a statutory duty on every Local Authority to exercise its various functions with due regard to the need to do all that it reasonably can do to prevent crime and disorder in its area.

The Licensing Policy has a key role in reducing alcohol related crime and disorder, the fear of crime and the prevention of nuisance or anti-social behaviour. Risk taking behaviour, such as irresponsible alcohol usage can affect individual, their families, local communities and society as a whole. This policy aims to play its part in minimising the negative aspects of alcohol supply and use.

### **Appendices**

*\*Add rows as required to box below*

Ref.	Title of Appendix	Exemption Paragraph Number (if applicable) <i>If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.</i>						
		1	2	3	4	5	6	7
A	Briefing report title							
B	Consultation responses							
C	Cumulative Impact Policy 2022 – 2025							
D	Equalities Impact Assessment (if applicable)							

**Background papers:**

\*Add rows as required to box below

Please list all unpublished, background papers relevant to the decision in the table below. Background papers are unpublished works, relied on to a material extent in preparing the report, which disclose facts or matters on which the report or an important part of the work is based.

Title of any background paper(s)	Exemption Paragraph Number (if applicable)						
	If some/all of the information is confidential, you must indicate why it is not for publication by virtue of Part 1 of Schedule 12A of the Local Government Act 1972 by ticking the relevant box.						
	1	2	3	4	5	6	7

**Sign off:**

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Originating Senior Leadership Team member: Rob Nelder											
Please confirm the Strategic Director(s) has agreed the report? Yes											
Date agreed: 14/11/2022											
Cabinet Member approval: Councillor Pat Patel (Cabinet Member for Customer Services, Culture, Leisure & Sport)											
Date approved: 17/11/2022											

## Appendix A: Briefing Report

### 1.0 Background

- 1.1 The Licensing Act 2003 regulates the sale of alcohol, provision of certain entertainment and late night refreshment. This is achieved by the use of a licensing system administered by the Council.
- 1.2 Under the Licensing Act 2003, a Licensing Authority may publish a Cumulative Impact Assessment. Such assessments may state that the licensing authority considers that the number of premises licences and club premises certificates in one or more parts of its area is such that it would likely be inconsistent with the authority's duty to carry out its functions with a view to promoting the licensing objectives to grant any further relevant authorisations in those parts of its area. A cumulative impact assessment must set out the evidence for the authority's opinion.
- 1.3 A Cumulative Impact Policy was first adopted by the Council in 2008 and has been reviewed regularly. The current Cumulative Impact Assessment was last reviewed with the Licensing Policy review and was effective from 31 March 2019. Section 5A of the Licensing Act 2003 requires the Cumulative Impact Assessment to be reviewed every three years to consider whether the Licensing Authority remains of the same opinion. If the Licensing Authority remains of that opinion, then it must revise the cumulative impact assessment so that it a) includes a statement to that effect and b) sets out the evidence as to why the authority remains of that opinion.
- 1.4 Cumulative impact means the potential impact that a significant number of licensed premises in one area can have on the promotion of the following four licensing objectives:
- Prevention of crime and disorder
  - Prevention of public nuisance
  - Public safety
  - Protection of children from harm
- 1.5 The updated Cumulative Impact Assessment (CIA) proposes to maintain the current five designated cumulative impact areas within Plymouth:
- Mutley
  - North Hill
  - Stoke
  - Barbican
  - Union Street (including Derry's cross)

**and** introduce a sixth, City Centre cumulative impact area.

The Devon and Cornwall Police Licensing report ('Police report') contained within Appendix A of the Cumulative Impact Assessment (CIA) (in Appendix C of this report) details the evidence as to why the five areas should remain and why the additional area should be included. This information was included within the formal consultation.

Appendix B within the CIA (in Appendix C of this report) states the number of noise and odour complaints within each CIA during 2019 – 2022 sent into the Public Protection Service, Office of the Director of Public Health. Appendix B, also shows the number of waste and street cleaning complaints within each Cumulative Impact Area during 2019 - 2022. This information was included within the formal consultation. The two additional areas of the Hoe and City

Centre have also been included to compare to the data provided within the Police's report. This shows the effect of the concentrated number of premises on the local residents by way of public nuisance and anti-social behaviour and is why these areas should remain in this CIA and the additional area of the City Centre included, on grounds of prevention of public nuisance. For example, reports of urination and defecation in the streets; overflowing waste or littering often dropped by customers on their way home or from smoking outside of premises; drug use; vandalism/graffiti and noise from the premises and from shouting in the street. A number of these complaints cannot be associated with one particular premises and is caused by the effect of the number of premises and the number of customers frequenting the areas at particular times of day and night.

The number of noise complaints in the new proposed City Centre CIA have doubled since 2019, despite Covid-19. However, there has been a number of new licensed premises that have opened over the last 3 years in the City Centre. Waste complaints have reduced by 60% from 2019 to 2021 in the City Centre and by 66% in Union Street/Derry's cross. This is likely to be linked to the reduced footfall in the City Centre areas both during the day and night time when businesses have been affected by the covid-19 restrictions. There has been a 30% increase in waste complaints in North Hill. North Hill is a busy area linking to Mutley Plan and there are a number of takeaways and retail shops in this area.

- 1.6 The Police report (in Appendix A) and the Public Protection report (in Appendix B) also considered whether the Hoe should be included as an additional CIA, however at this time, they concluded this is not required due to the relatively low level of crime and public nuisance noted which are directly linked to licensed premises. Therefore the Hoe is not included within this CIA, however, this area will be kept under review.

## 2.0 Consultation Process

- 2.1 A twelve week public consultation took place between 11 March 2022 and 3 June 2022.

The consultation process provided all stakeholders, interested parties and the public in general the opportunity to have their say on the content of the draft. The follow people were consulted:

- Citizen's Advice Bureau
- Safer Plymouth
- Devon and Cornwall and Somerset Constabulary
- Plymouth City Council Adult Social Care
- Plymouth City Council Children's Social Care
- Plymouth City Council Planning Services
- Office of Director of Public Health
- Chair of the Health and Wellbeing Board
- Plymouth City Council Environmental Health Service
- Plymouth City Council Community Connections
- Devon & Somerset Fire and Rescue Service
- Local Chambers of Commerce and Federation of Small businesses
- Representatives of local faith groups
- Local residents groups
- Representatives of existing licence-holders
- Best Bar None and Pubwatch
- Plymouth City Centre and Plymouth Waterfront Partnership Business Improvement Districts

- Voluntary and Community Organisations working with children and young people
- Ward Councillors

2.2 Letters were sent to all premises holding either a 'premises licence' or 'club premises licence' and personal licence holders advising them of the consultation. A similar letter was sent to the Resident / Community groups and faith groups for which contact details were available. Details of the consultation were posted on our webpages with a link to an online form to encourage feedback. A total of approximately 4000 people or groups were contacted directly by letter. In addition the responsible authorities were consulted (Police, Child Protection, Fire and Rescue Service, Trading Standards, Environmental Health, Public Health, Planning Authority, HSE, Maritime & Coastguard Agency and the Home Office).

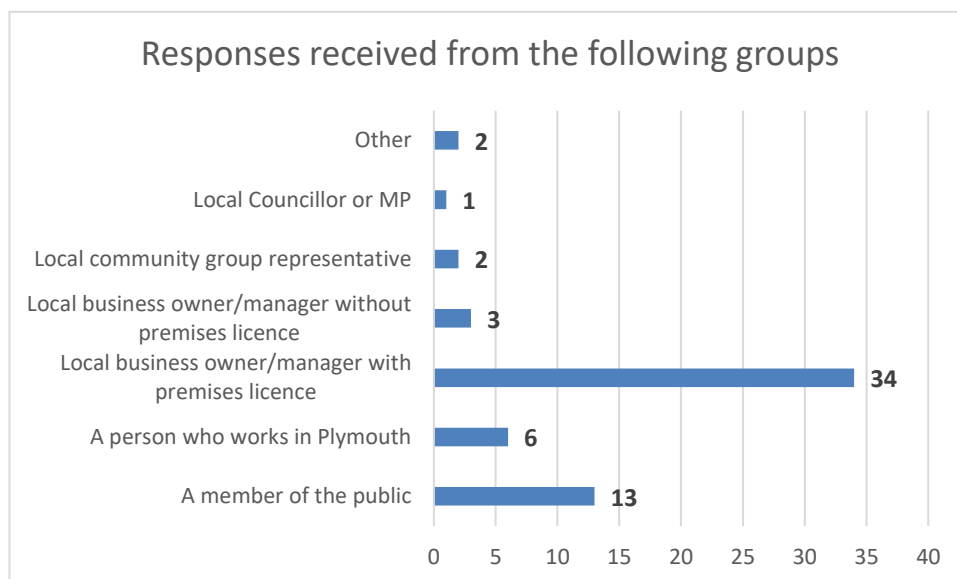
All ward Councillors were sent copies of the consultation documentation.

2.3 The Cumulative Impact Assessment is specified within the Council's Policy Framework. In accordance with the Constitution the Cabinet Member for Customer Service, Leisure and Sport referred the draft Policy to the Performance, Finance, and Customer Focus Overview and Scrutiny Committee for consultation. The Overview and Scrutiny Board considered this report on 14 December 2022 and had no recommendations.

### 3.0 Consultation Findings

3.1 A total of 61 responses were received following the consultation process.

3.2 The majority of responses were from business owners/managers with premises licences.

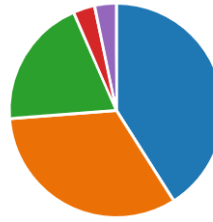


3.3 The majority of responses (74%) agreed that the Cumulative Impact Assessment should continue to cover the five current areas (Mutley, North Hill, Stoke, Barbican and Union Street (including Derry's Cross)).

To what extent do you agree or disagree with the proposal for the Cumulative Impact Assessment to continue to cover the five current areas (Mutley, North Hill, Stoke Barbican, Union Street (including Derry's Cross))?

[More Details](#)

● Strongly agree	25
● Agree	20
● Neither agree nor disagree	12
● Disagree	2
● Strongly disagree	2



- 3.4 The consultation questionnaire asked if the person would like to tell us why they have given the answer above or if they would like to suggest any changes to the defined boundary of the Cumulative impact areas. 27 replies were received and these can be found in Appendix B. The majority of these comments were in support of the five areas remaining.

### 3.5 Extending the CIA to include the City Centre Area

The majority of consultees agreed (76%) with the proposal to extend the CIA to include the City Centre Areas.

4. To what extent do you agree or disagree with the proposal to extend the Cumulative Impact Assessment to include the city centre area?

[More Details](#)

● Strongly agree	28
● Agree	19
● Neither agree nor disagree	8
● Disagree	2
● Strongly disagree	4



25 people advised why they had said they agreed or disagreed and the full comments can be found in Question 5 of Appendix B.

- 3.6 13 responses were received for the final question 'any other comments' and these can be found under Question 6 of Appendix B.

## 4.0 Cumulative Impact Assessment

- 4.1 The current Licensing Policy (2019 – 2024) includes a special policy in relation to Cumulative Impact. However, in Section 5A of the Licensing Act 2003, which was introduced in 2018, the Cumulative Impact Policy must be reviewed every three years to consider whether it remains of that opinion. The Cumulative Impact Policy will now be separate to the Licensing Policy. Guidance under s.182 of the Licensing Act 2003, describes this as the potential impact, on the promotion of the licensing objectives, of a number of licensed premises concentrated in one area. The cumulative impact of licensed premises on the promotion of the licensing objectives is a proper matter for a Licensing Authority to consider in developing its licensing policy statement.

- 4.2 There must be an evidential basis for the decision to adopt/maintain a Cumulative Impact Assessment (CIA) regarding cumulative impact areas.
- 4.3 Section 5A of the 2003 Act sets out what a licensing authority needs to do in order to publish a Cumulative Impact Assessment (CIA) and review it.
- 4.4 The following steps must be followed when considering whether the Cumulative Impact Assessment is still required:
- Consult with those persons specified in section 5(3) of the Licensing Act 2003. This has been done as per paragraph 2.1 above.
  - Subject to the outcome of the consultation, include and publish details of the Cumulative Impact Assessment (CIA) including the evidence in support of the assessment or publish a statement that the CIA is no longer appropriate.
- 4.5 The effect of maintaining the CIA is that the Council as licensing authority is setting out its approach to how it will consider applications for the grant or variation of premises licences or club premises certificates in the areas described. However, it does not change the fundamental way that licensing decisions are made.

## **5.0 Operation of the Cumulative Impact Policy**

- 5.1 Between 1 April 2019 – 31 March 2022, there have been a total of 58 applications for new premises or full variations in CIP areas. The two applications that were refused were refused because they didn't comply with the legislative requirements during the application stage such as not being advertising correctly. One variation was refused by Members of the Committee following an objection from the Police.

Type	Applied	Refused
New Application	42	2
Variation	16	1

The majority of applications received within the Cumulative Impact Areas have been for the grant of new café/restaurants which do not have the same impact as vertical drinking establishments. A number of off licences have been approved but have put additional conditions in their operating schedule for example to prevent the sale of single cans and not selling high strength cider/beer above 6.5 ABV.

- 5.2 A Cumulative Impact Policy requires applicants to deliver an increased standard of application and operating schedule in order to establish that the Policy should not be applied on that case. It does not prohibit future approval of new applications or variations to existing licenses. In every case the Licensing Committee must still prove the need for conditions or for the refusal of a licence following a representation from either a responsible authority or interested party.

## **6.0 Regulatory Impact**

- 6.1 Regulators must have regard to the principles contained in the Regulators Code when undertaking regulatory activities, including the establishment of policies. The specific obligations of the existing and proposed code relevant to the Licensing and Cumulative Impact Policies are:



## 6.2 Economic Progress

Regulators should consider the impact that their regulatory interventions may have on economic progress. They should only adopt a particular approach if the benefits justify the costs and it entails the minimum burden compatible with achieving their objectives. Regulators should consider the impact that their regulatory interventions may have on small businesses, ensuring that the regulatory interventions fall fairly and proportionately considering the size of the business and the nature of their activities.

## 6.3 Assessment of Risk

Regulators should ensure that the allocation of their regulatory efforts is targeted where they would be most effective by maximising their target outcomes. In general policies and activities must target those businesses where greater controls will lead to the increased promotion of the licensing objectives.

6.4 No evidence has been submitted that confirms a disproportionate detrimental economic effect of the policy. Local experience appears to demonstrate that there is not a disproportionate effect.

6.5 A Cumulative Impact Assessment will only affect businesses in areas where evidence exists of crime and disorder or public nuisance, thereby targeting further regulatory controls to areas of need. The policy is applied equally to all business sizes and would not have a disproportionate effect on small business. It is possible that small businesses may have greater scope to convince the Licensing Committee or the responsible authorities that their operations would not add further negative impact.

6.6 The application of controls through the Cumulative Impact Assessment are all subject to a legal test of being appropriate.

## 7.0 Conclusion

7.1 The operation of the Cumulative Impact Assessment to date has been undertaken in a proportionate way to balance the need to promote the licensing objectives and the needs of the evening and night time economy.

7.2 The evidence submitted by the Police contained within Appendix A of the CIA (in Appendix C of this report) shows elevated levels of crime and disorder due to the concentration of licensed premises within the six identified separate Cumulative Impact Areas.

7.3 The evidence submitted by the Public Protection Service contained within Appendix B of the CIA (in Appendix C of this report) shows the effect of the concentrated number of premises on the local area and in particular the antisocial behaviour that took place within the six identified Cumulative Impact Areas.

7.4 The responses received in relation to the Cumulative Impact Assessment consultation were positive and therefore it is recommended that the City Council agree to maintain a Cumulative Impact Assessment updated to include the addition of the City Centre area as contained in Appendix C with effect from 31 January 2023.

## Appendix B: Cumulative Impact consultation responses

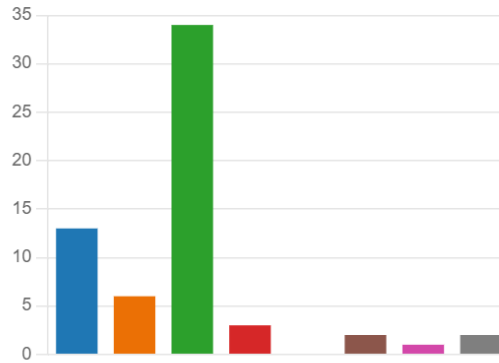
61 responses were received to the consultation.

### Question 1

1. Indicate which of the following best describes you:

[More Details](#)

<span style="color: blue;">●</span> A member of the public	13
<span style="color: orange;">●</span> A person who works in Plymouth	6
<span style="color: green;">●</span> Local business owner/manager ...	34
<span style="color: red;">●</span> Local business owner/manager ...	3
<span style="color: purple;">●</span> A trade representative (please s...	0
<span style="color: brown;">●</span> A local community group repres...	2
<span style="color: pink;">●</span> A local Councillor or MP	1
<span style="color: grey;">●</span> Other	2



### Question 2

Specify your trade representative

2. Specify your trade representative

0

Responses

Latest Responses

### Question 3

To what extent do you agree or disagree with the proposal for the Cumulative Impact Assessment to continue to cover the five current areas (Mutley, North Hill, Stoke Barbican, Union Street (including Derry's Cross))?

[More Details](#)

<span style="color: blue;">●</span> Strongly agree	25
<span style="color: orange;">●</span> Agree	20
<span style="color: green;">●</span> Neither agree nor disagree	12
<span style="color: red;">●</span> Disagree	2
<span style="color: purple;">●</span> Strongly disagree	2



ID	Name	Responses
1	anonymous	will help in deciding if licences should be awarded to new premises
2	anonymous	These areas have always been, problem is too strong a word, areas that need to be policed.
3	anonymous	most places in derrys croos expansion were as a direct approach of the council
4	anonymous	I think that Plymouth needs venues where people can have a quality night out and of course the are some venues who would need some stricter rules imposed by licencing. But there are some venues that would benefit more from modernising their interiors and a strict selection criteria at the front door, security is good but when you start imposing some strickter rules at the entrance like: table bookings, dress code, entry fee. That would filter the customers and at the same time hopefully bring back the welthy customers that are fleeing Plymouth for cities like Bristol or Cardiff because they don't feel safe in Plymouth nightvenues.
5	anonymous	These areas are known for ongoing miss behaviour with people under the influence & rogue security companies. It is better to have a high visual police presence and rules in place to help support local businesses and keep everyone safe. It is sadly a minority who spoil it for everyone.
6	anonymous	These are area where everyone goes for a night out and everyone needs to feel safer
7	anonymous	The licensing objectives need to be upheld, especially in built up ares as mentioned
8	anonymous	Any monitoring of this if done properly is a good thing.
9	anonymous	Because I believe this will be a positive action from the council that will benefit residents.
10	anonymous	To keep law and order
11	anonymous	I agree that these areas should be included. Most of these areas are in highly housed residential areas and noise / litter are the major problems. I feel late night ioening ie after 11 should be limited for special occassions only in order agin to keep the streets of these residential area safe the Barbican being the

		different one as it an area a lot of visitors go to and we should endeavour to keep it safe .
12	anonymous	Agree the correct areas of Plymouth are in place.
13	anonymous	I disagree with your policy as it dictates what people should do, mind your own business and let people get on with what they want to do
14	anonymous	As long as smaller localised areas may be reviewed as well on a case by case basis, i think the current areas are valid as an overview of key concern areas.
15	anonymous	There is no problem with alcohol- the problem arises from the people that consume it and the resulting anti social behaviour - bins are left on the pavements 24/7 and then these are often tipped over late at night by drunken people resulting in rubbish strewn over the streets which then has to be cleared up by the council.
16	anonymous	The night time economy of Plymouth is in need of change. I strongly believe that adding additional barriers to entrepreneurs and operators in the hospitality field is not the correct way to make this change. A CIC on off licences I agree with. Change in the nighttime culture should be brought about by design not regulation and barriers. These are the key actions I believe are needed. -Creating interesting, well kept, well lit and well curated spaces and venues that encourage good behaviour from customers. - Supporting current responsible operators. -Encouraging new operators and entrepreneurs to fill the unused units. - Providing safe and well lit transport or walking routes through the city. Making life easier for the council to act upon the ever growing battle between businesses and residents does nothing but stifle creativity and culture and deter new business which I turn stagnates the nighttime economy stopping any chance for improvements. The need and regulation to act upon residents complaints needs to be more focused and not delivered in a cumulative impact zone which assumes all are responsible for a minorities actions. I will state clearly that had this impact zone been in place before I moved to plymouth I would have thought again about starting in business here.
17	anonymous	As a hotel we receive many complaints regarding noise that comes from union street (especially Wetherspoon's beer garden late at night).
18	anonymous	Should always regularly check the impact
19	anonymous	There is large concentration of pubs in the local area, which are a source of antisocial behaviour
20	anonymous	as a resident in one of these areas and having a family, it is important to us that these areas have these control measures. I can only think that the same applies to residents in the other areas, and also to the businesses. It is a good measure for Plymouth as a whole for the "main area" of this industry to be controlled in this way.

21	anonymous	I live fairly close to a public house and travel home by car and have to pass the pub and others..usually there are customers of the pub standing in the road.Also having 2 small grandchildren we go for works and there is always rubbish etc outside the pub
22	anonymous	These are areas frequented by young people and students or have known anti social behaviour problems
23	anonymous	Is there a comma missing between Stoke and Barbican???
24	anonymous	In my view and over 30 years within the licence trade, we owe it to the community and areas in the town to beware of what time of business are opening in these areas. Night clubs and late bars should have the responsibility to evolve to the current climate and trends, this is where the council needs to be involved on a ground level rather than give licences to any business. Needs to be a balance... Look at Gloucester Road & Cheltenham Road in Bristol full of good independent businesses and balance mix of restaurants, bars, late venues, coffee shops, and all managed very well. All about balance
25	anonymous	Yes I would like to suggest that the city centre is included as part of the CIA.
26	anonymous	busiest areas, but some small pubs in single areas do cause areas
27	anonymous	It is necessary to reduce the nuisance to the public.

### Question 4

4. To what extent do you agree or disagree with the proposal to extend the Cumulative Impact Assessment to include the city centre area?

[More Details](#)

Strongly agree	28
Agree	19
Neither agree nor disagree	8
Disagree	2
Strongly disagree	4



### Question 5

If you would like to tell us why you have chosen your above answer in Question 4, or if you would like to suggest a change to the defined boundary, please do so using the textbox below:

[More Details](#)

[Insights](#)

25 Responses

Latest Responses

"The city centre needs to be kept clean and needs to have the right manage..."

ID	Name	Responses
1	anonymous	I feel the main areas of concern are covered.
2	anonymous	There have been too many violent incidents in the centre.
3	anonymous	If the pandemic has taught us anything is business needs to be able to adapt and quickly , enforcing more red tape does not support the development of the city and job growth when business' are put off when excessive enforcements are put in place driving business to not want to invest in the area
4	anonymous	city centre should be encouraged to bring in more cafes bars etc
5	anonymous	Not as bussy as the other areas in Plymouth .
6	anonymous	I believe the police would know the best areas to provide support where they need. As there job is already difficult it is better to help where we can
7	anonymous	As above
8	anonymous	as above.
9	anonymous	makes sense to include the area people walk through to get to other drinking areas
10	anonymous	There is a lot of disorder that needs addressing in the city centre so this can only help
11	anonymous	We are seeing an increase in unsavoury people in the city centre drinking from bottles and can. A lot of this unsocial drinking is from people begging in shop doorways and the regular drunks you see mostly near frankfort gate or the car park beside
12	anonymous	Agree the city area can be busy especially at the weekends. I can only speak for shops who follow and ahere to the guidelines set by licencing, we are happy to work with yourselves.
13	anonymous	See above
14	anonymous	we dont have as many licensed venues as we used to in the city centre BUT as a focal point for the city and with a potential for negative issues to be very visible and affect a larger number of people this could be considered.
15	anonymous	See my answer above.
16	anonymous	As previously. I do not believe these unfocused zones are good for business or the economy.
17	anonymous	Should always regularly check the impact

18	anonymous	The impact on the local environment is detrimental, with antisocial behaviour and intimidating behaviour caused by the use of the pubs within the Stonehouse area.
19	anonymous	the city centre is obviously open for licensed activities all day and being a hub for all types of people and tourists it would be a good idea to include this area in the C I P to reduce the problems that the objectives are there to control.
20	anonymous	Make the area safer for the public
21	anonymous	The area to the west of the city centre below the sundial has a serious homeless street begging anti social environment which reflects badly on the local area especially on visitors
22	anonymous	There aren't many residential properties in the city centre, limiting businesses within this area could prevent business growth
23	anonymous	I agree within the priceable in make these areas save, but again all depends what you are allowing to open.
24	anonymous	The city centre is an area that has some serious problems at times, but not always at the same times as the other areas, but it should be included as a CIA
25	anonymous	The city centre needs to be kept clean and needs to have the right management in place.

**Question 6: Any other comments question – 13 responses**

<b>ID</b>	<b>Name</b>	<b>Responses</b>
1	anonymous	I don't particularly venture to Plymouth city centre myself for a night out as I feel it is an unsafe area. This is why I choose to trade my business in areas with a better clientele
2	anonymous	I believe this is in the interest of residents and also children in particular.
3	anonymous	No
4	anonymous	No I think the council are doing as much as they can. It would help if the persistent offenders could be given jail sentences rather than just a slap on the wrist and they then go straight out to offend. You could also stop people walking in the street drinking alcohol. If an order was passed banning it from these said areas, the police could stop people a lot easier. Zero tolerance is needed
5	anonymous	Always happy to work with Licencing and making the city safe.
6	anonymous	We want see any problems near by.
7	anonymous	We want see any problems near by.
8	anonymous	Yes concentrate more on public services which is what your are paid for make a start with the bin collections
9	anonymous	There seems to be more premises permitted to serve alcohol outside their property on the pavements in outside seating areas - this only adds to the problem of noise and nuisance
10	anonymous	I would strongly urge that the local licenses be reviewed and a careful assessment of the impact of the drinking and antisocial behaviour be controlled and urge licences to be revoked.
11	anonymous	late night refreshment vans and establishments are causing a littering problem within the city centre, and cause groups of intoxicated people to gather. I strongly agree with any plans put in place to bring this under control a bit.
12	anonymous	As before looking at small pubs in residential area
13	anonymous	The combined effect of too many licensed and late night operations in one area causes much cost in cleaning up and public nuisance. This needs to be controlled so as to reduce the risks to the public, while also trying to educate those creating the problems.



