

The Act requires that the way in which the objectives are to be upheld should be included in a statement of licensing policy. This document must be reviewed every 5 years to ensure it

remains fit for purpose. As part of this process, local authorities can consider the potential cumulative impact of a large number of premises operating in a small area and, if warranted, publish a Cumulative Impact Policy (CIP) as part of this.

An amendment to the Act, made via the Policing & Crime Act 2017, placed the principles of Cumulative Impact on a statutory basis, adding the concept to the face of the law. Before this it was only present in the guidance made under s182 of the Act, which still stands. The new Section of the Act gives Cumulative Impact a stronger status in law but the definition remains as written within the guidance. The new sections talk about a Cumulative Impact Assessment. It is this assessment that should lead directly to the decision as to whether there is a cumulative impact and also how the local authority should respond to it.

8.3 Cumulative Impact Policy

These have undoubtedly helped licensing authorities to limit the number or type of licence applications granted in areas where the number of licensed premises is causing problems. Such problems have typically included crime and disorder or public nuisance caused by large numbers of drinkers being concentrated in one area.

However, the fact that the concept of Cumulative Impact was originally only set out in the guidance issued under Section 182 of the Act meant that not all licensing authorities have made or are making effective or consistent use of them.

This has led to the licensed trade having concerns about the transparency of the process for putting a CIP in place and the quality of evidence used as the basis for some. Putting the process on a statutory basis and requiring an assessment of a broad range of factors should help tackle these perceptions.

Below is the definition of Cumulative Impact: (Home Office Guidance, issued under section 182 of the Licensing Act 2003)

“Cumulative impact is the potential impact on the promotion of the licensing objectives of a number of licensed premises concentrated in one area”

8.4 Cumulative Impact Assessment

Gloucester City is home to a number of popular restaurants, bars, night clubs and late night refreshment venues.

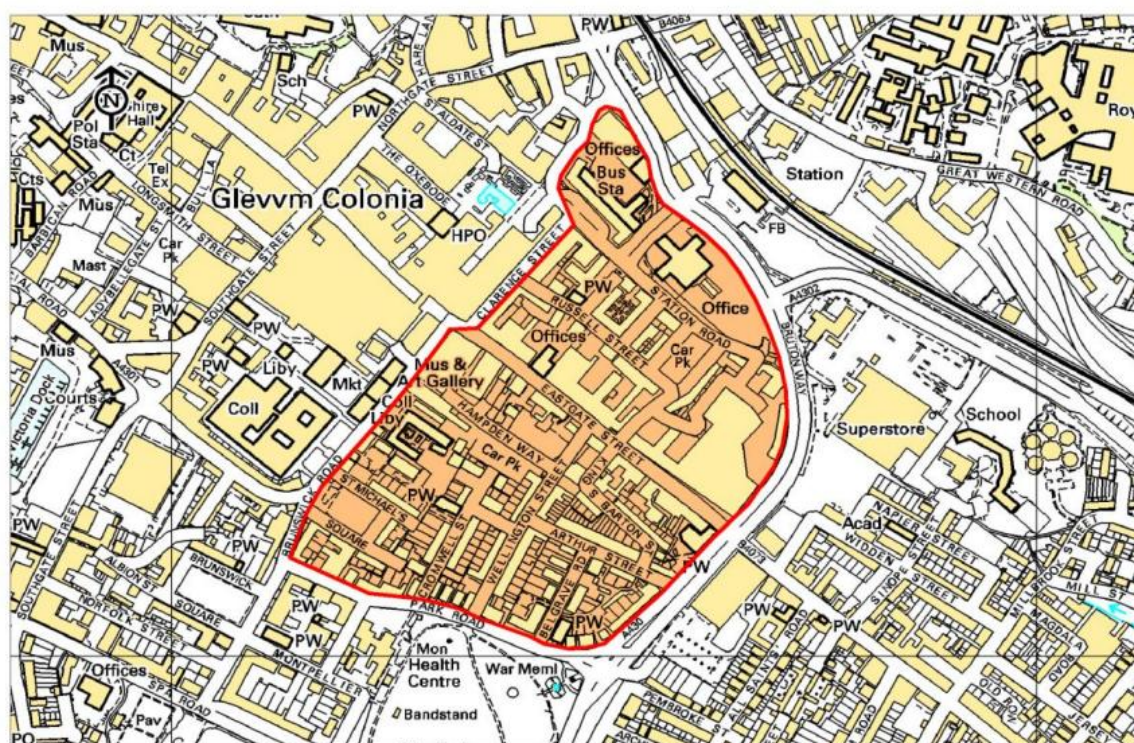
The Council encourages the development of a variety of premises providing a range of licensed activities catering for a wide range of users. This is reflected in Gloucester City Council having received a purple flag award.

The assessment relates to all types of licensed premises carrying on licensable activities within the cumulative impact zone, including the sale of alcohol for 20 consumption on or off the premises (or both), the provision of late night refreshment and regulated entertainment. The assessment does not apply to Temporary Event Notices (TENs); however the evidence upon which the assessment is based may be used by the relevant responsible authorities when submitting objections to TENs.

The council considers that, in a specified part of the City Centre within and around Eastgate Street, the number of premises licences and/or club premises certificates are such that it is likely that granting further licences or variations to existing relevant authorisations would be inconsistent with our duty to promote the licensing objectives.

Although this assessment provides an evidential basis for applications within the CIP to be refused; it does not relieve responsible authorities or any other persons of the need to make a relevant representation. Each application will be considered on a case by case basis and applicants are expected to demonstrate why the operation of the premises would not add to the cumulative impact already being experienced. The assessment will never be used as a ground for revoking an existing licence or certificate.

The evidential basis for the assessment is set out below; The area identified by the assessment can be seen below and identified within the red line.



This assessment will be kept under review and changes may be made in relation to local circumstances, the Licensing Act, associated regulations or statutory guidance.

8.5 Police Data

Gloucestershire Constabulary provided a submission focusing on crime and disorder and alcohol related incidents that have taken place over the past 10 years for the total incidents and incidents involving alcohol within the current cumulative impact area.

The two tables below show the data provided by Gloucestershire Constabulary in relation to both Crime and Disorder incidents and incidents involving alcohol within the current cumulative impact area.

Total Incidents within the Cumulative Impact Area

Year	Number of Incidents
2015-2016	1366
2016-2017	1410
2017-2018	1375

2018-2019	1081
2019-2020	1136
2020-2021	783
2021-2022	1064
2022-2023	1292
2023-2024	1284
2024-2025	1249

Incidents involving alcohol within the Cumulative Impact Area

2015-2016	222
2016-2017	212
2017-2018	197
2018-2019	150
2019-2020	172
2020-2021	46
2021-2022	133
2022-2023	155
2023-2024	89
2024-2025	51

From the two tables above you can see that incidents of crimes have gone up since the last review and the number of alcohol related incidents have gone down.

As part of their submission Gloucestershire Constabulary recognise that there is compelling evidence that where a CIA is in place and supported and embraced by both the Police and local authority that it does help to reduce crime and disorder, Gloucestershire Constabulary also state that alcohol related incidents within Eastgate Street are still the highest in the county and although the issue has reduced over the years there is still a significant problem and therefore would not like to see the Cumulative Impact Policy taken out of the Statement of Licensing Policy.

8.6 Conclusions

The analysis indicates the number of reported crimes have increased since the last review. The alcohol related incidents have reduced and Gloucestershire Constabulary believe the reason for this is that there is a CIP in place. As this is the case it is not considered enough to dispense with the cumulative impact zone.

It is considered that the statistical data evidenced above together with a written report produced by Gloucestershire Constabulary clearly supports the retention of the special policy relating to cumulative impact.

Additionally, the data does not indicate that any extension to the geographical area of the CIP is required.

The area of the Licensing Authority to which this 'Special Policy' will apply is identified in the map attached at Appendix C. The area identified includes the following streets:

Eastgate Street

Clarence Street (south east side)

Brunswick Road (south east side)

Park Road (north side)

Bruton Way (west side from Park Road to Market Parade)

Station Road Russell

Street Hampden Way

Wellington Street

Cromwell Street

Arthur Street

Belgrave Road

Kingsbarton Street

St Michael's Square Market Parade (south east side)