

## **B&NES Licensing Policy and Cumulative Impact Assessment in Bath City Centre - Licensing Act 2003**

The Council held a consultation from 21<sup>st</sup> June to 12<sup>th</sup> Sept on (a) its Licensing Policy and (b) its Cumulative Impact Assessment in Bath City Centre, under the Licensing Act 2003. FoBRA took advice from PERA and TARA and submitted the following:

### **Licensing Policy:**

FoBRA commends the emphasis in the draft policy on best practice and the incorporation of examples of best practice. However, we should have liked to have seen more in that best practice about working with local residents and residents' representatives. Where licensees have shown a willingness to engage with local residents, significant reductions in complaints and real reductions in public nuisance have been seen. Examples include preapplication consultations, acceptance of conditions to hold regular meetings with residents, giving residents contact telephone numbers and participation in Nightwatch.

### **Cumulative Impact Assessment (CIA) in Bath City Centre:**

While accepting that the redrawing of the boundary of the cumulative impact boundary reflects the new situation on the ground, largely due to key premises closing or significantly changing their business models, FoBRA considers that the extension across Pulteney Bridge incorporating Argyle Street, and the top of Grove Street should be included as these areas have recently seen a great increase in short term multi-occupancy holiday lets, with a many more in the process of being converted. This is likely to see an increase in the type of anti-social behavior that would qualify for this area to be included in a CIA.

Additionally, FoBRA supports inclusion of the river bank outside the Rugby Stadium, with relevant adjacent streets and areas, on the grounds that there is soon to be a substantial planning application which is expected to include several new licensable premises in this area, likely greatly to increase the cumulative impact within the timeframe of the review.

Robin Kerr, Chairman

12<sup>th</sup> Sept 19