

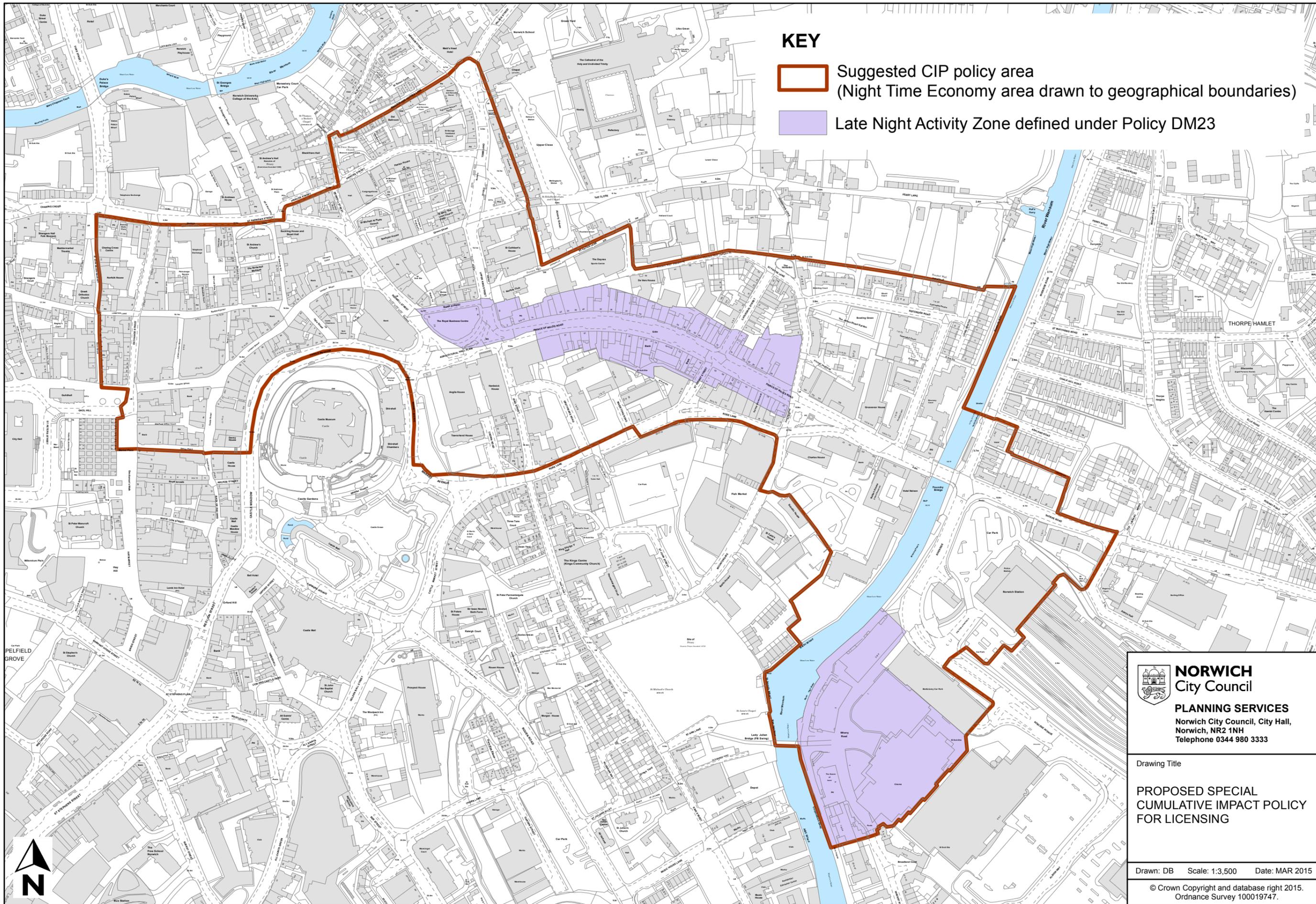
## **Proposed cumulative impact policy for licensing Comments of the planning service**

1. The planning service supports the objectives of the proposed special cumulative impact policy (CIP) and welcomes the proposed measures to tackle the problems associated with late night noise, crime and disorder. We agree that there is sufficient evidence of problems based on Police statistics to justify such an approach.
2. We recognise that the objectives of the proposed cumulative impact policy for licensing and the council's adopted local plan policies for late night uses are both predicated on effectively managing the impacts of the late night economy on the city centre, by seeking to focus late night uses mainly within a relatively small area and to resist further harmful concentrations of those uses – in particular clubs, bars and takeaways. Through appropriate application of the special cumulative impact policy working together with existing planning policies, potentially problematic uses and associated problems of crime and disorder will be discouraged from being dispersed into a wider area. Accordingly we consider that the objectives of the planning and licensing policy are consistent and should provide an appropriate set of tools to address these impacts.
3. It is important that the proposed licensing policy, if adopted, is seen to dovetail together with the council's adopted local plan policies relating to the evening and late night economy to ensure that potential policy conflicts are minimised and the scope and purpose of each policy approach are understood by decision makers and city centre stakeholders. In introducing the cumulative impact policy it may help if it is clarified that it is not intended to promote dispersal of late night economic activities to parts of the city centre outside the CIP area.
4. The proposed licensing policy and existing planning policy together, alongside other complementary measures:
  - Recognise that there will be a continuing role for late night entertainment uses within the city centre as part of its overall leisure and hospitality offer;
  - Encourage the development and further appropriate expansion of the evening economy consistent with the need to protect the amenity and living and working conditions of city centre residents and businesses
  - Strike an appropriate balance between supporting a vibrant night time economy and managing its impacts responsibly, particularly in relation to late night bars, clubs and takeaways, ensuring that residential amenity is protected through the consistent application of planning policy and that the four statutory objectives of licensing legislation are met;
  - Encourage responsible management practice and cooperation among operators to reduce potential for crime and disorder;
  - Strongly discourage the dispersal and proliferation of late night licensable activities, in particular clubs and bars, to noise sensitive areas of the city centre (in particular residential areas) and continue to focus and contain the

majority of late night uses within the Late Night Activity Zone as defined in the local plan.

5. We consider that it would be helpful if the boundaries of the proposed CIP area were more precisely drawn on a large scale map base to aid interpretation of the policy. As drawn schematically in the report, the proposed boundaries appear to run through buildings and it may not be clear whether a particular premises lies within or outside the area. Attached is a suggested revised version of the map which reflects issues on the ground. We feel it may be easier for people to understand and implement.
6. We would be happy to be involved in any future discussions with licensing officers and the Police (potentially involving the preparation of supplementary planning guidance and advice) to identify any issues around the operation of planning policy and the proposed new licensing policy in the city centre and to improve the effectiveness of the approach and maximise benefits for the public.
7. Further, it will be particularly important to keep the issue under review. Some areas of the city centre immediately adjoining the proposed CIP area may change significantly in coming years (notably through redevelopment at St. Anne's Wharf and in the Rose Lane/Mounteragate area) and this may require the area of the CIP to be reviewed in future.

Jonathan Bunting  
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12 March 2015



**KEY**

- Suggested CIP policy area  
(Night Time Economy area drawn to geographical boundaries)
- Late Night Activity Zone defined under Policy DM23

**NORWICH**  
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Drawing Title

**PROPOSED SPECIAL  
CUMULATIVE IMPACT POLICY  
FOR LICENSING**

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