

Entertainment Licensing,
Civic Hall,
Leeds
LS1 1UR.

7th November 2014

Dear Sirs

Representations as part of the public consultation to the CIP Review 2015

My name is Paul Nathan-Geary MRICS the principal of Geary Associates a commercial property, leisure and development consultancy with over 30 years' experience advising land owners and occupiers in promoting regeneration projects in Leeds city centre.

Since 2009 I have had an active asset management role in operational leisure premises in the Kirkgate and Lower Briggate areas on behalf of both building owners and leisure operators. This experience has highlighted first-hand the issues facing both operators and public stakeholders in promoting the Licensing Objectives while operating in the night time economy.

My representations reflect both my personal opinion and experience of the Kirkgate and Briggate areas rather than necessarily the views of clients that I represent.

City Centre CIP Draft Guidance 2015

The annual review of the City Centre CIP is welcome to ensure that it is relevant and responds to changes. However, I would wish to make the following observations and representations:

- 1.0** As this document is intended as guidance for prospective Licencing applicants in practice it is only a part of the regulatory compliance required in order for an operator to trade.
Consequently, a more comprehensive guidance document supported by updated planning and environmental policy guidance would encourage better quality applications which will start to address some of the ongoing problems identified in the conclusions to the draft guidance.
- 2.0** Any policy should seek to positively address the reasons behind the crime statistics rather than just offer a containment strategy within a prescribed area. The trend evidence from the updated crime statistics is suggesting that in reality some of the problems are being decanted and replicated in other locations within the city centre.
- 3.0** In my view the primary reasons for the crime hotspot identified around the Calls and Briggate can be summarised as follows:-
 - A concentration of premises trading beyond 2.00 am causing early morning street dispersal issues at a time when on street police resources are limited.
 - A confluence of leisure footfall between 2200 -0200 hours of patrons leaving premises to go home or moving on to later opening venues with those arriving to commence their night out.

Paul E. Nathan-Geary MRICS

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- A concentration of licenced premises within the Call Lane area with no private external break out space resulting in large gatherings on the public footpath and highway creating tensions with traffic and passing pedestrians.
- Venues operating independent promoter events periodically attract undesirable customer groups causing tensions inside and outside venues with regular leisure goers to the area.
- A general culture of early evening binge drinking before arriving into the area to attend late night venues in the area results in a higher than average incidence of street crime and disorder.

4.0 The updated crime statistics appear to indicate that the Licencing initiatives to address issues are reducing crime and disorder within venues. However, on street crime especially theft and robbery appears to be increasing and displaced into the area of Lower Briggate adjacent one of the primary taxi stands which by and large is poorly marshalled and provides a potential flash point for late night crime and disorder.

In responding to the current consultation draft guidance I would suggest that the following additions to the policy document are made:-

1. A general presumption within the city that premises licence applications will not be validated nor considered without planning approval first being obtained. Planning powers and conditions used constructively within an updated planning policy framework to address city centre management aspirations will provide the Licensing Authority with a more robust management tool to address the crime and disorder issues identified.
2. A general presumption within the city against granting consent to licence premises for on sales that do not provide external privately managed break out space within the offer unless the premises form part of a larger managed estate such as shopping centres. This will reduce the number of suitable new leisure venues, raise competition standards and so encourage existing operators in "sub-standard" premises to relocate in the longer term.
3. A policy note to commit to producing a more integrated multi agency guidance document for integrating licensed leisure premises into the city centre.

Further topics for future policy review consideration.

1. A licensing system for "footloose" promoters and their events to control the negative impact of regular event promotions being moved around the city licensed venues.
2. A multi -agency approach to dispersing the night time economy from the city centre. The street marshal initiative has a limited role in customer dispersal management given that crime and disorder statistics indicate a shift to crime onto the public realm which has legal implications for private security companies intervening in street crime and disorder. A strategy which deploys multi agency resources supported by the police into taxi and public transport marshalling to manage street dispersal needs to be considered on a city wide basis to address on street crime and prevent displacement hotspots occurring as a result of the current street management strategies deployed in the city.

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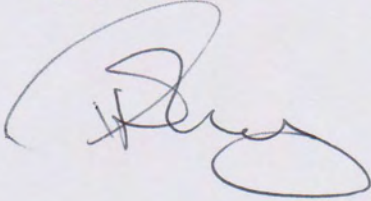
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3. A city wide late night operator levy to make a funding contribution towards a transparent and fully costed city wide street dispersal strategy.
4. A cultural policy initiative promoted by the city council which puts in place measures to eradicate “through the night” alcohol trading from premises as part of a visitor friendly European approach to encourage a diverse and vibrant leisure mix as part of a managed 24 hour city centre economy.

I look forward to receiving further feedback to the public consultation of the CIP draft guidance.

Yours faithfully,



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