

TRACT Deputation – Key Points

This deputation is being made by TRACT (Tenants & Residents Camden Town) and KTRA (Kentish Town Rod Action) The points in it having been agreed by several groups representing residents from across the Borough. We also agree with the points on Framework Hours and conditions made by the CGCA.

You are asked to determine whether there is evidence of Cumulative Impact. Residents and the Police say that there is

Cumulative Impact arises when there are many premises in a small area. Residents are most concerned about cumulative impact on **Prevention of Public Nuisance**

Camden Town and Seven Dials have 48% of all the Licensed Premises in the Borough in less than 6% of its area. These have been Cumulative Impact areas since the Licensing Act came into force in 2005.

The Police have told the Council that there **is** Cumulative Impact on Crime and Disorder in these areas.

Groups representing residents in the Cumulative Impact areas say that there is Cumulative Impact on public nuisance, much of it related to noise from customers in the street and outside the control of individual premises.

The SixtillSix report sits on the fence, saying “on balance, there is insufficient compelling evidence”. It also says that “**Crucially in Camden the council does not specifically collect noise complaints related to noise from customers on the street.**” (See P 218 Para 3.7.1.6). Starting to collect this data is one of the recommendations in the report (see P276).

Is there evidence of Cumulative Impact?

Crime & Disorder - the Police say there is

Public Nuisance residents say there is and the Council doesn't collect data so doesn't know.

Absence of evidence is not the same as evidence of absence.

The Council **should** publish a Cumulative Impact Assessment for consultation.

This does not mean that you have to keep the same Cumulative Impact Policy.

Wording of the current Policy may indeed dissuade some potentially good operators but also dissuades potentially bad ones. Don't discard a Policy that has protected residents for 20 years without consultation.

The FOI request made to Camden shows that the number of licences premises has increased rather than reduced so the Cumulative Impact Policy is clearly not dissuading businesses from opening.

Consult on the assessment, and only once you have the results of this consultation decide how restrictive a policy is needed or if you need one at all. The Police agree that this makes sense.